Vancouver City Council

Anne McEnerny-Ogle, Mayor
Bart Hansen - Ty Stober - Erik Paulsen
Sarah J. Fox - Diana H. Perez - Kim D. Harless

City Council Meeting Agenda
June 1, 2026

In accordance with the Open Public Meetings Act (OPMA), the Vancouver City Council meeting will be open to in-person attendance. Options for viewing and/or participating in the meeting remotely will also be accommodated. The City Council will be attending this meeting in person.

All City Council workshops and meetings are broadcast (live closed captioning available), CVTV cable channels 23 / HD 323.

Public testimony will be accepted regarding any matter on the agenda below. Advance registration will be required.

Unless otherwise announced by the Presiding Officer, each speaker may testify once for up to three minutes under each public testimony opportunity below and will be asked to provide their name and city of residence for the record.

Testimony will be accepted in the following manner:

- **Written comments submitted in advance**: Email comments to the City Council until 12:00 p.m. June 1, 2026. Comments will be compiled and sent to the City Council and entered into the record.
- **In-person or remote testimony during the meeting**: Register in-person at City Hall. In-person registration is open until 6:30 p.m. on June 1, 2026. Instructions will be provided on-site. Register to testify online. Online registration is open until 12:00 p.m. on June 1, 2026.

Visit the city's website for more information and to register under Community Testimony or call the City Manager's Office at (360) 487-8600.

Further instructions for accessing the virtual meeting (for remote testimony) will be provided upon registration.

Upon request, printouts of agenda materials will be provided, including large print.

Workshops: 4:00-6:00 p.m.

Vancouver City Hall - Council Chambers - 415 W 6th Street, Vancouver WA

Inspire Vancouver Program Update
(Approximately 30 minutes)

Stacey Donovan, Cultural Services Manager, stacey.donovan@cityofvancouver.us

Clark County Sustainable Funding Team Update
(Approximately 30 minutes, to immediately follow the previous workshop)

David Perlick, Director of Parks, Recreation and Cultural Services, david.perlick@cityofvancouver.us

Transportation Improvement Program (TIP) 2027-2032
(Approximately 1 hour, to immediately follow the previous workshop)

Kate Drennan, Transportation Planning Program Manager, Ryan Lopossa, Streets and Transportation Manager, kate.drennan@cityofvancouver.us, ryan.lopossa@cityofvancouver.us

Council Dinner / Administrative Updates (6:00 - 6:30 PM)

Regular Council Meeting

6:30 PM
Vancouver City Hall - Council Chambers - 415 W 6th Street, Vancouver WA

Pledge of Allegiance

Call to Order and Roll Call

Approval of Minutes

Proclamations

Pride Month

National Pollinator Week

Great Outdoors Month

National Gun Violence Awareness Day

Community Communication
This is the place on the agenda where the public is invited to speak to Council regarding any matter on the Agenda not already scheduled for Public Hearing. (Separate instructions are provided for offering testimony on Public Hearing when applicable.) This includes the option to testify about Workshops. Members of the public addressing Council are requested to give their name and city of residence for the audio record. Speakers are to limit their testimony to a total of three minutes for all items combined.

Consent Agenda
The following items will be passed by a single motion to approve all listed actions and resolutions. There will be no discussion on these items unless requested by Council. If discussion is requested, the item will be moved from the Consent Agenda and considered separately – after the motion has been made and passed to approve the remaining items.

1. Contract Award - 2026 Resurfacing Project - C-102284

Staff Report: 106-26

Request: On Monday, June 1, 2026, award a construction contract for the 2026 Resurfacing Project to the lowest responsive bidder, Granite Construction Company, of Vancouver, WA, at the bid price of $2,205,896, which includes Washington State Sales tax, and authorize the City Manager, or designee, to finalize and execute the contract and authorize any legal action necessary to enforce the terms of the same.

Chris Sneider, Senior Civil Engineer, chris.sneider@cityofvancouver.us

2. Service Agreement - NE 18th Street - NE 138th Street to NE 162nd Street for Design Services- C-102271

Staff Report: 107-26

Request: On Monday, June 1, 2026, authorize the City Manager, or designee, to finalize and execute a professional services agreement with Harper Houf Peterson Righellis Inc. for a contract amount of $2,817,466.52.

Leslie Degenhart, Civil Engineer 3, Hassan Abdalla, Engineering Manager, Leslie.Degenhart@cityofvancouver.us, hassan.abdalla@cityofvancouver.us

3. Contract Amendment - Increase the Maximum Expenditures for State of Washington DES 00819: Fleet Card Services - C-100675

Staff Report: 108-26

Request: On Monday, June 1, 2026, authorize the City Manager, or designee, to finalize and execute a contract amendment with WEX Bank to increase the current maximum approval from $300,000 to $600,000. The amended amount would be used to purchase fuel and EV charging.

Jacob Mahan, Senior Management Analyst, jacob.mahan@cityofvancouver.us

4. Interstate Bridge Replacement Intergovernmental Agreement Amendment

Staff Report: 109-26

Request: On Monday, June 1, 2026, authorize the City Manager, or designee, to execute Amendment No. 3 to contract GCB 3544 between the City of Vancouver and Washington State Department of Transportation. Extend the termination date to June 30, 2027.

Katherine Kelly, Program and Policy Development Manager, katherine.kelly@cityofvancouver.us

5. Vancouver Police Command Guild Collective Bargaining Agreement 2026-2028

Staff Report: 110-26

Request: On Monday, June 1, 2026, authorize the City Manager, or designee, to sign the collective bargaining agreement with the Vancouver Police Command Guild for 2026-2028.

Antoinette Gasbarre, Human Resources Director, Robert Prociak, People and Labor Strategy Manager, Antoinette.Gasbarre@cityofvancouver.us, Rob.Prociak@cityofvancouver.us

6. 2025 Affordable Housing Fund Temporary Shelter Contract Extensions

A RESOLUTION relating to temporary shelter; providing for adoption of an increased funding

award and timeline extension for the 2025 Share WHAT Shelter and YWCA SafeChoice Shelter agreements and authorizing the City Manager to execute agreements and other related documents and disburse funds in accordance with those agreements on behalf of the City of Vancouver consistent with the Affordable Housing Fund Council-approved funding awards.

Staff Report: 111-26

Request: On Monday, June 1, 2026, finalize and approve the resolution of the 2025 Affordable Housing Fund Temporary Shelter contract amendments, authorizing the City Manager, or designee, to execute agreements and other related documents and disburse funds in accordance with those agreements on behalf of the City of Vancouver consistent with the Affordable Housing Fund 2025 Council-approved contract funding increase and timeline extension.

Kimberly Kerlee, Senior Support Specialist, Samantha Whitley, Housing Programs Manager, kimberly.kerlee@cityofvancouver.us, samantha.whitley@cityofvancouver.us

7. Washington State Historic Society Heritage Capital Projects Grant

A RESOLUTION authorizing the City of Vancouver to apply for a Heritage Capital Projects grant from the Washington State Historical Society to fund rehabilitation of four buildings on Officers Row; providing for severability and an effective date.

Staff Report: 112-26

Request: On June 1, 2026, adopt a resolution supporting the City applying for a 2027-2029 Heritage Capital Projects grant from Washington State Historic Society to support structural preservation of Officers Row buildings 3, 4, 12, and 18.

David Perlick, Director of Parks, Recreation and Cultural Services, david.perlick@cityofvancouver.us

8. Approval of the Claim Vouchers

Request: Approve claim vouchers for June 1, 2026.

Public Hearings

The following item(s) are scheduled for public hearing. Members of the public addressing Council are requested to give their name and city of residence for the audio record. Unless otherwise announced by the Presiding Officer, speakers are to limit their testimony to three minutes for each public hearing.

9. Ordinance Adopting the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code

AN ORDINANCE updating and amending the City of Vancouver 2026-2045 Comprehensive Plan, called Our Vancouver, repealing and replacing the City of Vancouver Zoning Map, and repealing and replacing Title 20 Land Use and Development Code of the Vancouver Municipal

Code, providing for severability and an effective date.

Staff Report: 103-26

Request: On Monday, June 1, 2026, upon second reading and a public hearing, finalize and approve the ordinance adopting the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code.

Rebecca Kennedy, Deputy Community Development Director, Mark Person, Senior Planner, rebecca.kennedy@cityofvancouver.us, mark.person@cityofvancouver.us

Communications

A. From the Council

B. From the Mayor

C. From the City Manager

Community Forum

This is the place on the agenda where the public is invited to speak to Council regarding any matter. Members of the public addressing Council are requested to give their name and city of residence for the record. Speakers are to limit their testimony to a total of three minutes. Up to 90 minutes will be allotted for the Community Forum.

Adjournment

City Hall is served by C-TRAN. Route information and schedules are available online at www.c-tran.com. You also may reach C-TRAN at (360) 695-0123 for more information on times, fares, and routes.

Anyone needing language interpretation services or accommodations with a disability at a Vancouver City Council meeting may contact the City Manager's staff at (360) 487-8600 (RELAY: 711). Assistive listening devices and live Closed Captioning are available for the deaf, hard of hearing and general public use. Please notify a staff person if you wish to use one of the devices. Every attempt at reasonable accommodation will be made. To request this agenda in another format, please also contact the phone numbers listed above.



Inspire Vancouver

Inspire Vancouver Update

Stacey Donovan
Cultural Services Manager
Parks, Recreation and Cultural Services
June 1, 2026



Agenda

- Inspire Vancouver overview
- Progress to date
- Community engagement
- Work ahead and next steps

What is Inspire Vancouver?



Arts

Visual arts, music, dance, theater and literary arts



Culture

Shared traditions, values, languages, and creative expressions



Heritage

History, landmarks, folklore and passed down cultural resources



Science

Physical, natural, life, earth and space sciences and engineering and technology

Who Can Apply for Inspire Vancouver Grants?

Eligibility Requirements

- Primary purpose to advance or preserve arts, culture, heritage or science
- 501(c)3 nonprofit or individual with an eligible nonprofit fiscal sponsor
- Located within Vancouver city limits or provide at least 55% of your programs within Vancouver city limits
- Provide public programs or experiences for Vancouver residents

Not Eligible

- State and local government agencies
- Organizations that redistribute funds
- TV, radio, newspapers, magazines and internet-based media

Inspire Vancouver Work to Date

2025	Q1 2026	Q2 2026	Q3 2026	Q4 2026
• Begin cultural access tax collection • Create community-informed draft policy • Adopt cultural access policy	• Establish grant processes and procedures • Create program brand and identity • Establish available funding pool	• Hire staff • Launch website and social media channels • Design grant application portal • Community outreach and education	• Recruit and train grant review committee • Continued community outreach • Limited Innovation, Impact and Comprehensive grants open	• Distribute school funds • Award year one grants • Announce Capital grant timing for 2027 • Reporting

Community Outreach

- Focus on eligible individuals and organizations
- Grow social networks and program ambassadors
- Community info sessions
- Continue to develop communications around real time feedback
- Expand public outreach after grants are awarded









Work Ahead

Staff and commission

- Launch online grant management software
- Applications, scoring rubrics and guidelines
- Grant application workshops and one-on-one support
- Select grant review committee(s)

Staff Roles

- Program supervisor
- Grant coordinator (2)
- Communications specialist
- High levels of direct support and communication are community and commission priorities

Discussion



Parks:
Regional Funding Task Team

Clark County Public Works - Parks and Nature Division

June 1, 2026

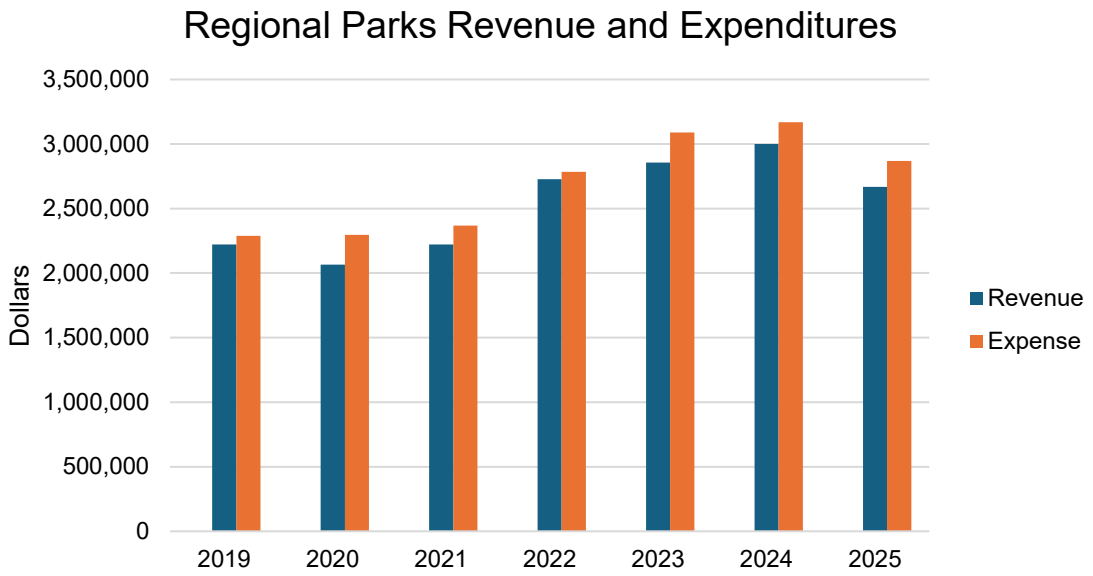
Agenda

- Summary of Needs
- National Benchmarking
- Funding Models Comparison
- Recommended Next Steps



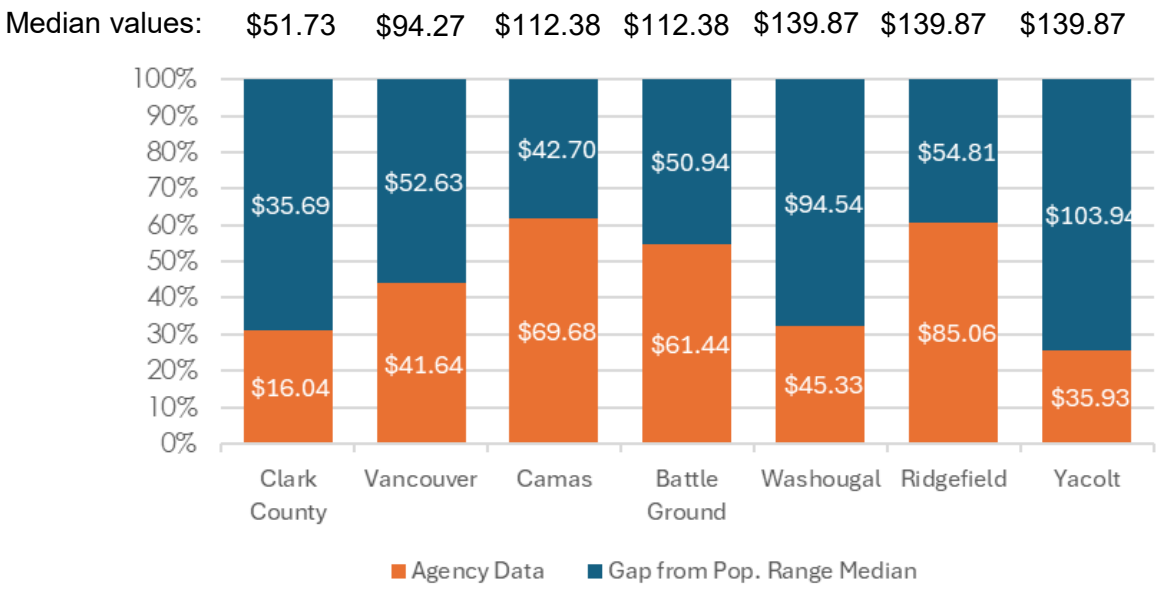
Summary of Needs – Clark County

- Clark County parks system is not meeting its existing needs due to a lack of available funding, rising costs, and rapid population growth.
- For the past 5 years, the County has had to use reserve funds just to cover the basic services at our Regional Parks.



National Benchmarking – Regional Expenditures

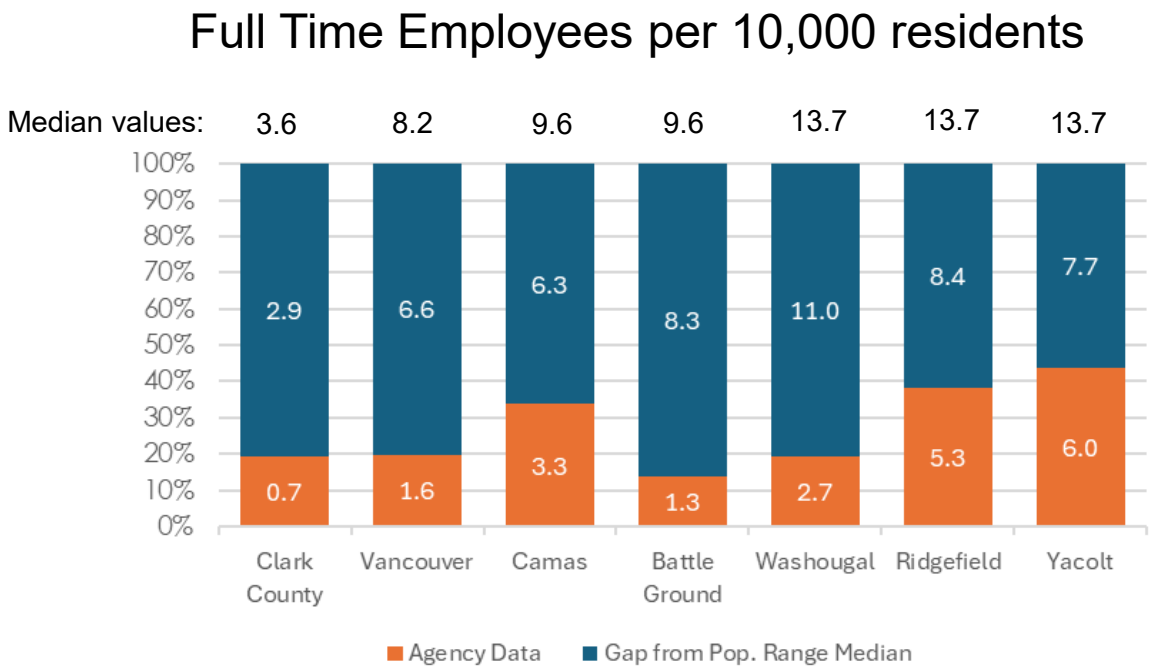
Parks Operating Expenditures Per Capita



All park systems are below the national median for operating expenditures of similar populations.

Each park system compared their metrics to the national median for communities of their size. Park system data are plotted in orange and the gap to meet the national median is plotted in navy blue.

National Benchmarking – Regional FTEs



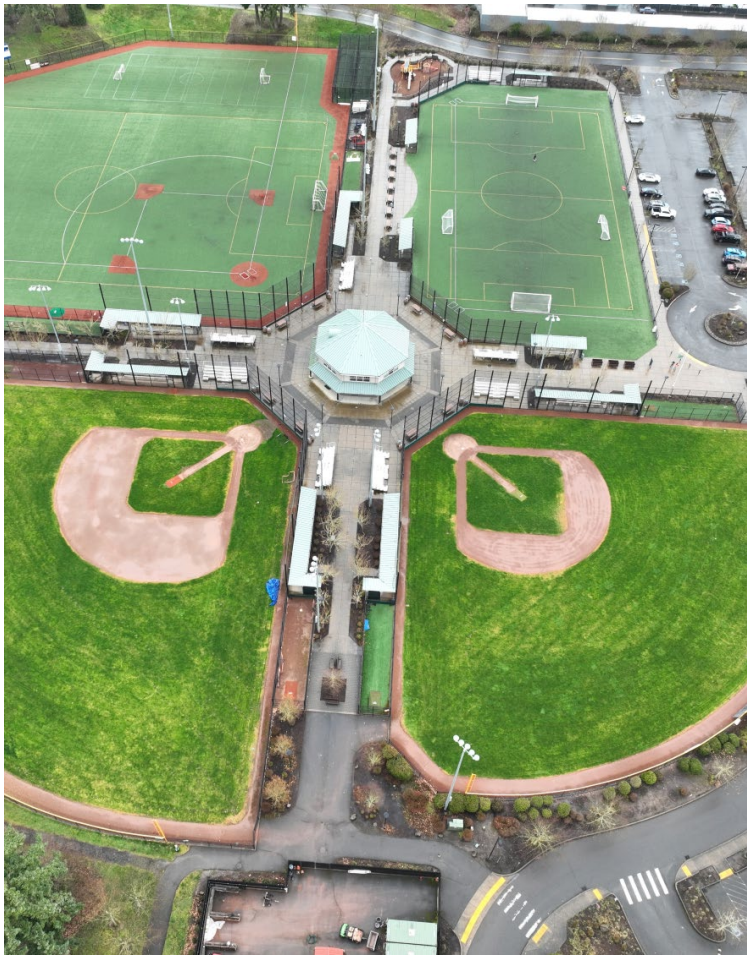
All park systems are below the national median for full time employees (FTE) per 10,000.

Each park system compared their metrics to the national median for communities of their size. Park system data are plotted in orange and the gap to meet the national median is plotted in navy blue.

Future Needs

- County expected to grow 34% over the next 20 years
- Parks systems need to grow to match these needs

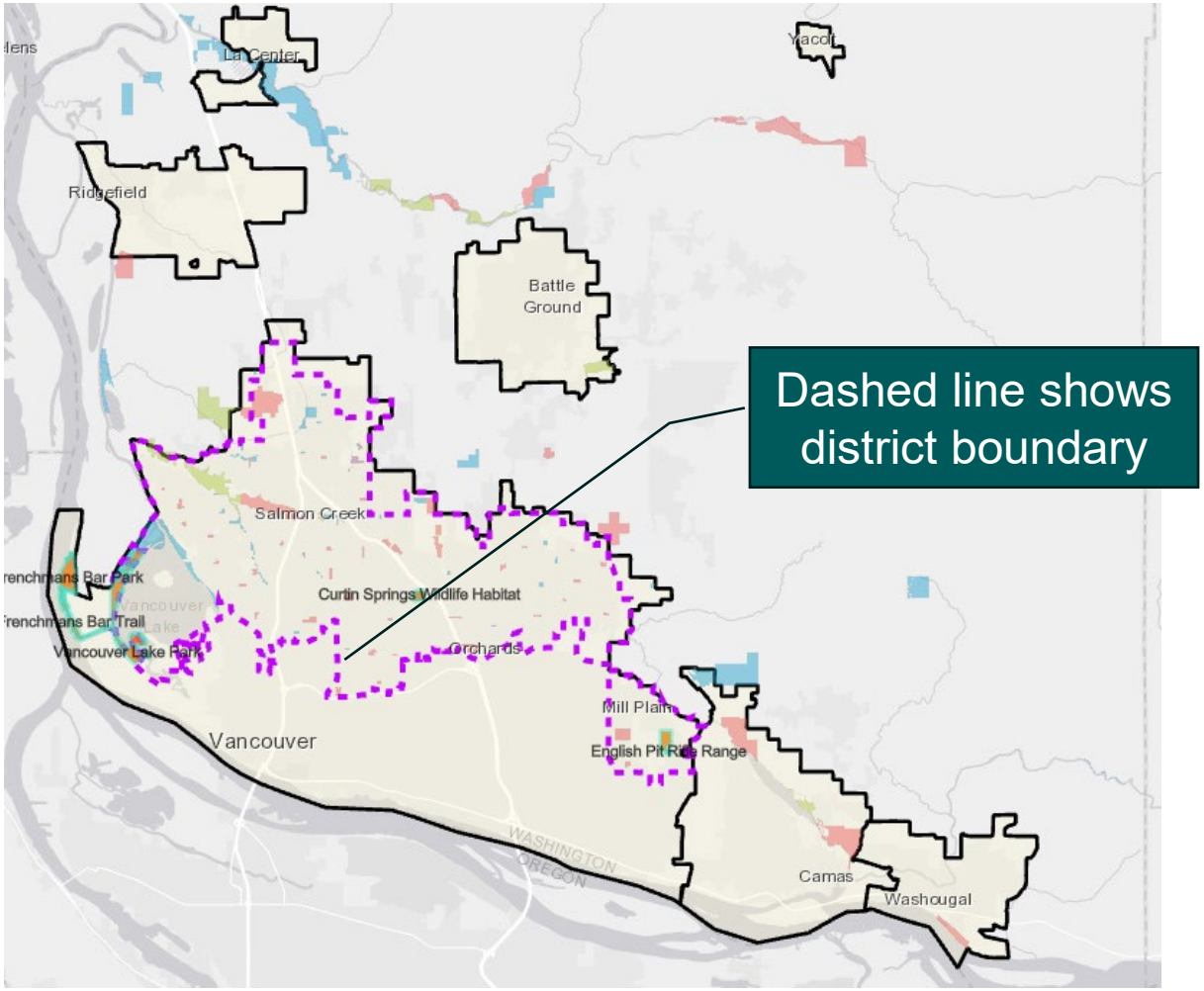




Funding Models Comparison

	Metropolitan Parks District - funding structure	Regional Levy (county-wide)
Requires voter-designated boundary	●	
Funds cannot leave district	●	
Permanent levy	●	Voter renewal required
Board/Council oversight	●	●
Potential for shared revenue	●	●
Potential for shared resources	●	●
Funds can be used for operations (both parks and recreational services) and capital	●	●

Existing MPD: Greater Clark Park District



RECOMMENDED ACTIONS

1. **Conducting market research** to provide the data, feasibility evaluations, and **conducting public education** and other preparatory work needed for County Council to make a decision on a potential future ballot measure.

2. **Determining viability and process** for adopting either funding mechanism by conducting formal legal reviews.

3. **Developing a framework for revenue sharing** by directing county staff to continue to work with city representatives so that city park providers can also benefit from a potential revenue source dedicated to parks.

Next Steps

- Do you feel the process will provide the appropriate information for further Council consideration?
- What specific information will be helpful for your decision-making?



CITY OF Vancouver WASHINGTON

Transportation Improvement Program 2027 - 2032

Kate Drennan
Transportation Planning Manager
Community Development

Ryan Lopossa
Transportation Division Manager
Public Works

June 1, 2026



Agenda

- Transportation Improvement Program (TIP) overview
- 2027-2032 updates
- Key projects
- Project prioritization
- Finances
- TIP Next Steps

Transportation Improvement Program Overview

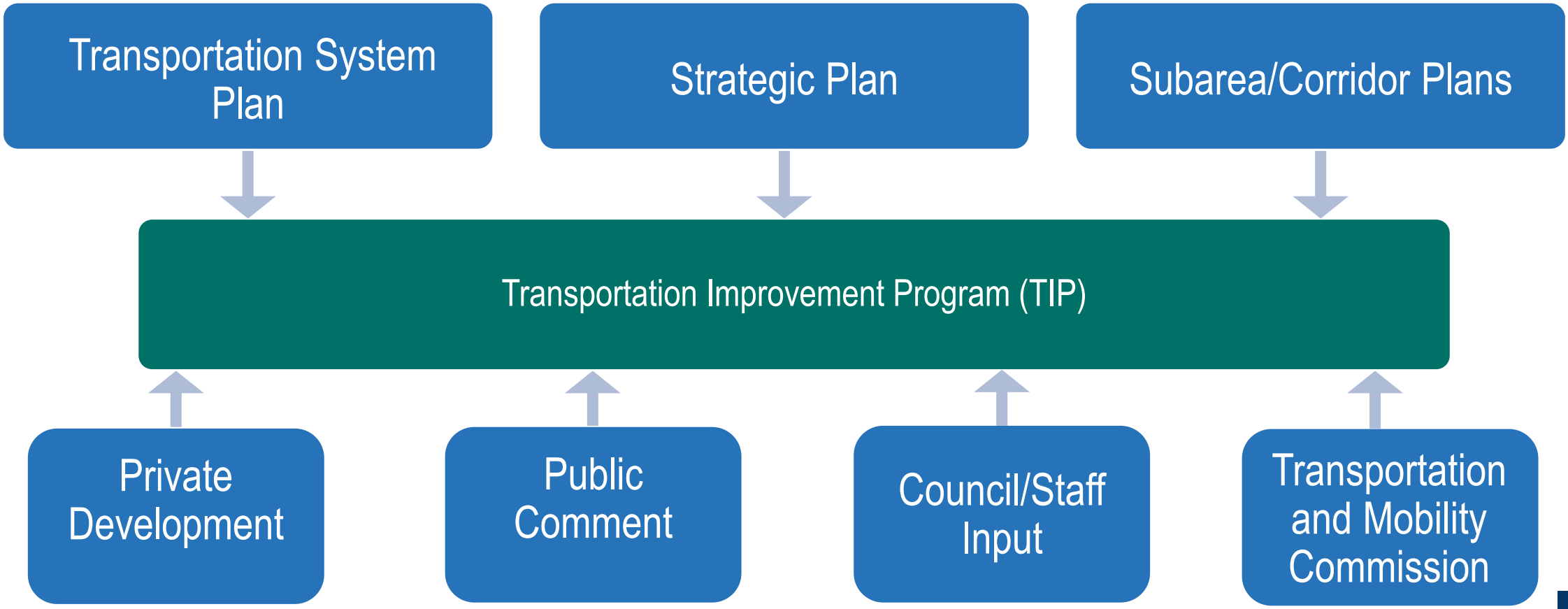
What is the TIP?

- Six-year plan for future transportation capital projects and programs.
- Current draft is for 2027-2032.
- Updated annually per WA law.
- City Council approval by July 1.
- Helps with coordinated planning.
- Projects with State and/or Federal grants are required to be included.

What is in the TIP document?

- Introduction, finances, project lists, project detail sheets and maps
- Funded, partially funded, and unfunded project lists.
- Arterial, signal/lighting, and active transportation project lists.
- Projects added, removed and changes for the TIP this year.

Transportation Improvement Program Inputs



Transportation Improvement Program Update

What are the proposed changes for 2027-2032 TIP?

- Final TIP with projects beyond the 6-year horizon; post-Comprehensive Plan adoption the 'long-term' projects will reside on the Capital Facilities Plan.
- Updated project scoring and prioritization – on pages 36-37
- Projects added/removed – on pages 39-42
- Arterial map classification changes - on page 174
- Public comments – on pages 14-20
- Full TIP document found at: City of Vancouver Transportation Improvement Program Document

Key Project Highlights

- Heights Mill Plain/ MacArthur Intersection
- Heights Grand Loop Project
- 18th Street (NE 97th to NE 107th)
- 192nd Avenue (SE 1st to NE 18th Street)
- NE 18th Street (NE 141st Avenue to NE 162nd Avenue)
- Multiple corridor improvement projects to create complete streets

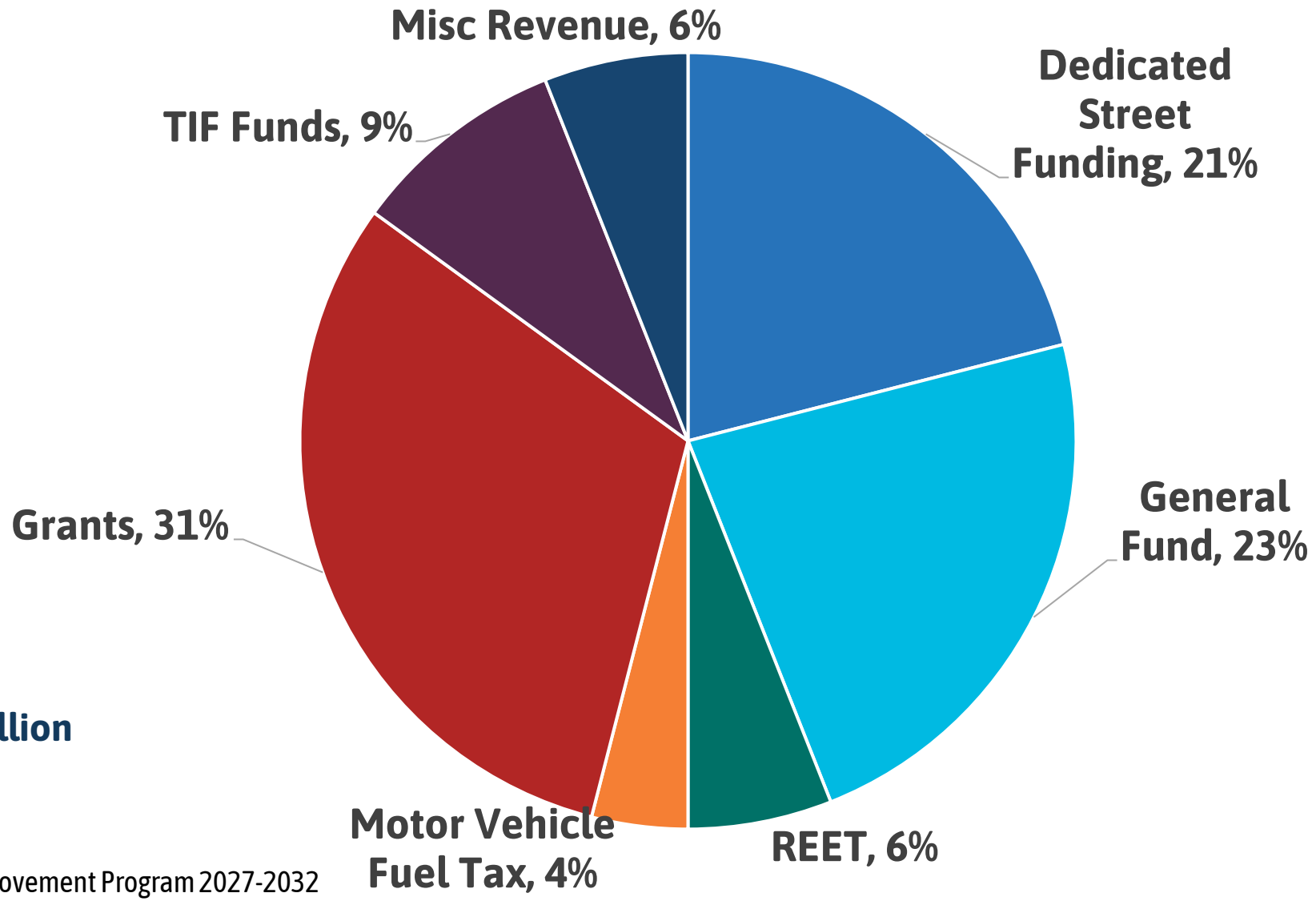
Project Scoring and Prioritization

Categorize projects into near-, medium-, and long-term groups

Phase 1	Phase 2	Phase 3
Where to Invest	**When to Invest**	**Cost v. Benefit**
Equity Index	Pavement Opportunities	Cost *(Estimated Project Total)*
Collisions	Coordination	
Essential Places	Quick Wins	Benefit *(Equals Phase 1 Score Plus Phase 2 Score)*
Future Growth Areas	Right-of-Way Impacts	
	Environmental Impacts	

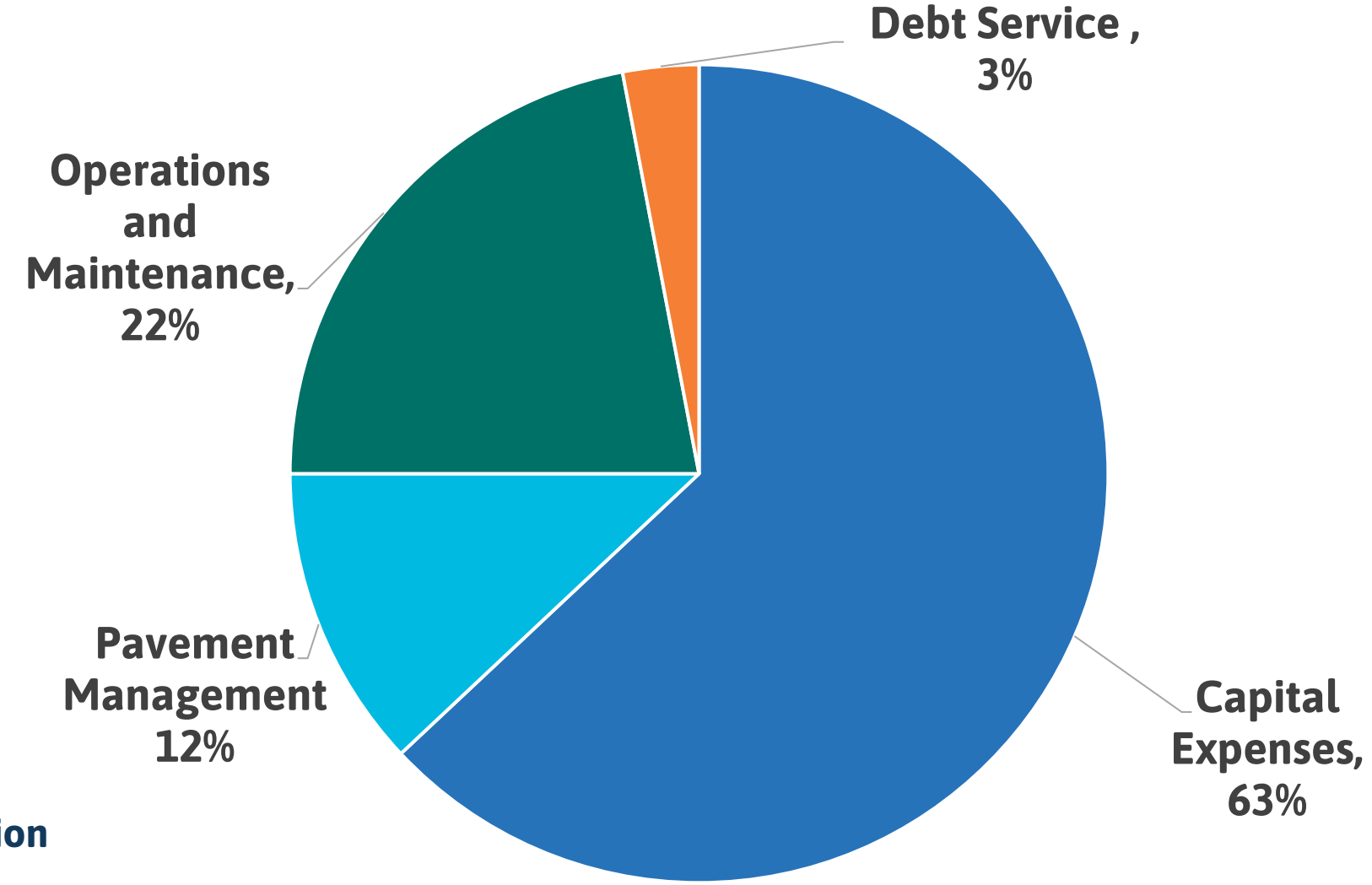
Priority
Groups
Near-Term
Medium-Term
Long-Term

Streets Revenue Operating and Capital (2025)



Total: $77.4 Million

Streets Expenses Operating and Capital (2025)



Total: $92.6 Million



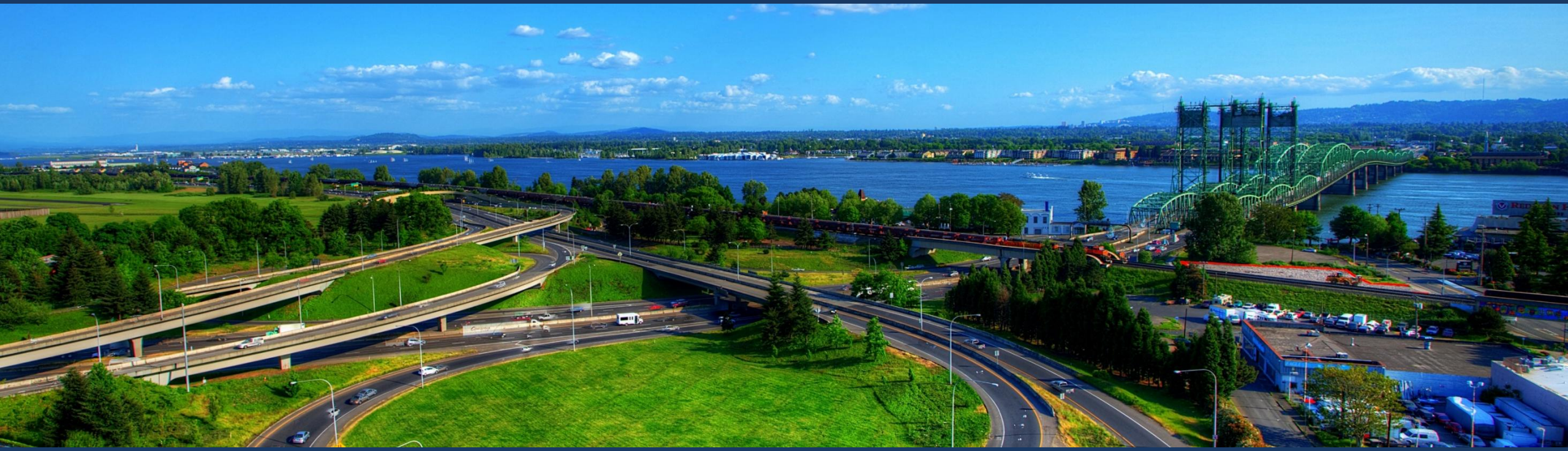
Next Steps

Public Hearing on Council Agenda for June 15, 2026 for adoption

Transportation and Mobility Commission made formal recommendation to adopt on May 5, 2026.

www.cityofvancouver.us/tip

Discussion & Thank You



Kate.Drennan@cityofvancouver.us

Ryan.Lopossa@cityofvancouver.us

2027-2032 Transportation Improvement Program

CITY OF Vancouver WASHINGTON



Transportation | Public Works Department

June 2026

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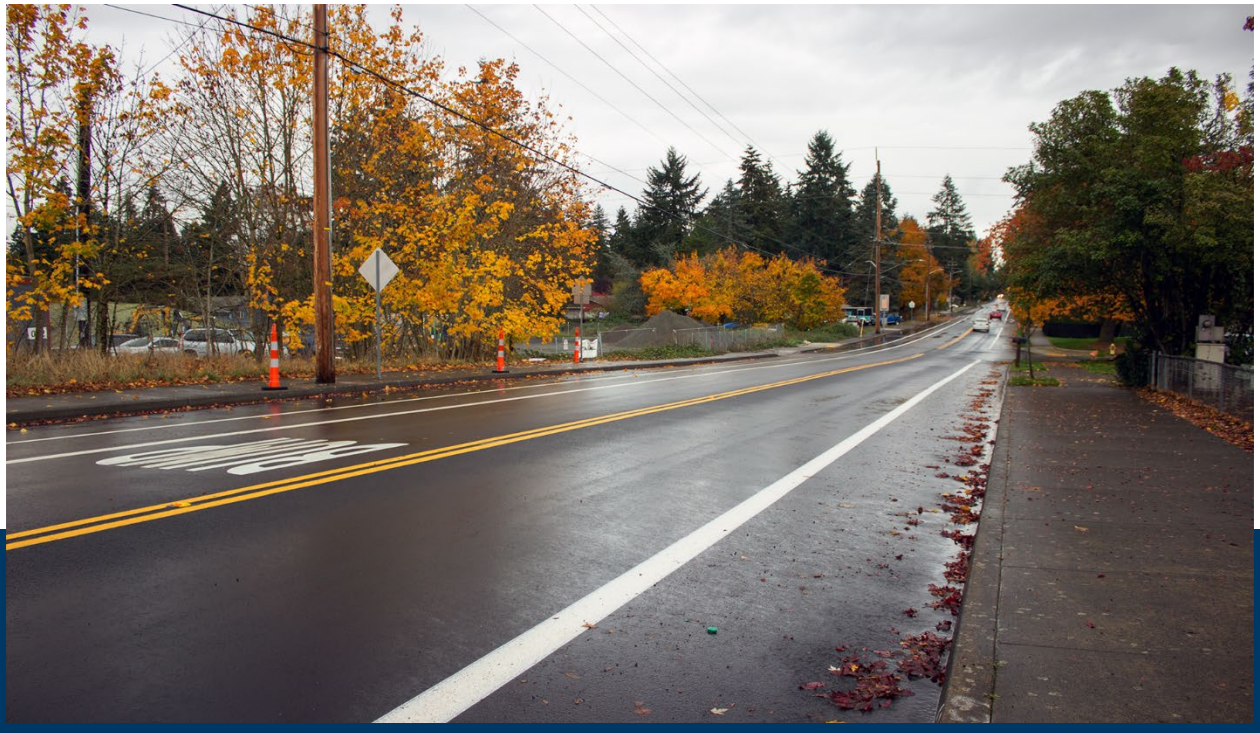

6/15/26

RESOLUTION NO._____

A RESOLUTION adopting the City of Vancouver's Comprehensive Six-Year Transportation Improvement Program for 2027-2032 and the City's Arterial Street System and Classification Map.

WHEREAS, pursuant to RCW 35.77.010, the Vancouver Department of Public Works has prepared the Comprehensive Six-Year Transportation Improvement Program for 2027-2032 ("2027-2032 TIP"); and

WHEREAS, the purpose of the 2027-2032 TIP is to ensure that the City will have available advance plans as a guide in carrying out a coordinated street construction program; and

WHEREAS, the City's Arterial Street System and Classification Map ("Arterial Classification Map") is maintained within the 2027-2032 TIP; and

WHEREAS, City Council annually reviews proposals and makes classification designation changes on the map where the use of a roadway is inconsistent with its current arterial designation; and'

WHEREAS, notice of the time and place for a hearing on the 2027-2032 TIP was published in accordance with law; and

WHEREAS, the City Council conducted a public hearing on June 15, 2026 at 6:30 p.m., where it considered the 2027-2032 TIP and determined to adopt it.

NOW, THEREFORE,

BE IT RESOLVED BY THE CITY OF VANCOUVER:

Section 1. Legislative Findings. The above recitals are adopted as the legislative findings of Vancouver's City Council in support of adoption of this Resolution.

Section 2. City Council adopts the attached Exhibit A, the 2027–2032 Comprehensive Six-Year TIP, including the Arterial Street System and Classification Map. Staff are further authorized to pursue grants and loans, and to acquire real property rights through any legal means for projects listed in this Six-Year TIP.

Section 3. The City Manager or their designee is hereby directed to file the 2027-2032 Comprehensive Six-Year TIP with Arterial Street System and Classification Map with the Washington State Department of Transportation within 30 days of adoption of this Resolution.

ADOPTED at regular session of the Council of the City of Vancouver on June 15, 2026.

_____
Anne McEnerny-Ogle, Mayor

Attest:

_____
Natasha Ramras, City Clerk

Approved as to form:

_____
Nena Cook, City Attorney

Letter from Transportation Leadership

Hello neighbors,

Thank you for your interest in Vancouver's Transportation Improvement Program (TIP). This plan plays a vital role in shaping a safe, efficient, and sustainable transportation network for our community.

Each year, we update our Six-Year TIP to plan for future projects that enhance mobility, safety, and accessibility across the city. These projects range from planning studies to construction of major infrastructure improvements, all supporting Vancouver's Strategic Plan and ensuring that our transportation system serves everyone—whether traveling by car, bike, transit, or on foot.

The 2027-2032 TIP builds on key efforts, including the recent adoption of the Transportation System Plan (TSP) and ongoing city-wide comprehensive planning efforts, which will guide policies, programs, and projects with a strong emphasis on safety, access, sustainability, and equity. This update also continues investments in neighborhood traffic calming, multimodal safety, and accessibility improvements, while pursuing grant opportunities to expand active transportation connections and upgrade key corridors.

Funding for these projects comes from various sources, including local and state taxes, vehicle license fees, and state and federal grants. We encourage you to explore the TIP, share your feedback, and help shape Vancouver's transportation future by visiting the TIP website.

Your voice is essential as we work to enhance transportation options and improve the quality of life in our city. Thank you for being part of this effort!

Steven R. Wall, P.E.
Public Works Director

Ryan Lopossa, P.E.
Transportation Division Manager

Transportation Improvement Program Overview

The City of Vancouver's 2027-2032 Transportation Improvement Program (TIP) is an update of the City's 2026-2031 TIP. The TIP is a technical document for transportation improvements over a six-year period. For more information about our street system, how it is funded, and how money is spent, visit Street System - Needs and Strategies website.

The State of Washington law (RCW 35.77.010) requires the City to prepare a TIP annually that is consistent with and implements our adopted comprehensive growth management plan. The TIP identifies capital transportation system improvement projects and includes a policy to work with affected property owners to preserve railroad right-of-way in the event a railroad ceases to operate.

For information about the City's Comprehensive Plan, contact Vancouver Planning at 360-487-7803 or visit the Comprehensive Plan website. For questions or more information about specific transportation projects, please contact Vancouver Public Works at 360-487-7130, or visit the City's website.

Projects are added to the TIP each year as needed based on input from staff, the development community, adopted subarea plans, other agencies, advocacy groups, community and as new grant opportunities arise. Projects are removed from the TIP each year once they are constructed. In some cases, a project is removed because the project is no longer needed although this is rare. TIP suggestions and questions can be submitted on the TIP Comment Form for consideration.

A City of Vancouver Arterial Street System and Classification Map which designates roadways functionally classified as Arterials pursuant to VMC 11.80.040 and VMC 9.02.040 is adopted and attached hereto.

The 2027-2032 TIP is utilizing a similar prioritization process that was used to score the Transportation System Plan (TSP) projects. Scoring criterion are created to reflect the strategic goals, city policies, and management directives. The scored priority groups are near-term, medium-term, and long-term; and can be found on the left side of the partially funded and unfunded project within 6-year lists.

2027-2032 TIP Highlights

Neighborhood Traffic Calming Program: Funded at $300,000 annually, this program works with community members to enhance neighborhood safety and livability.

Multimodal Safety and Accessibility Program: For 2026-2027, the program will focus on implementing key safety and mobility improvements along Upper Main Street, McGillivray Blvd., Garrison Rd. and the Burnt Bridge Creek Trail Crossing on Hazel Dell Ave.

Grant Efforts:
We are pursuing opportunities to fund active transportation connections, fill sidewalk gaps, increase crossing safety, and upgrade arterials from state and federal sources.

Other Major Projects: The 2027-2032 TIP identifies funding for many projects, which require several years for planning, design, right-of-way, and construction phases. These include:

- Heights Mill Plain/MacArthur: Project is fully funded with construction anticipated to commence in early 2026.

- Heights Grand Loop Project: Project is fully funded with construction anticipated to commence in 2027.

- NE 18th Street (NE 97th Avenue to NE 107th Avenue): Right-of-way acquisition and final engineering design is currently underway with construction planned for early 2027.

- NE 192nd Avenue (SE 1st Street to NE 18th Street): Project is partially funded with preliminary engineering underway in 2024, and the right-of-way phase is anticipated to get underway in 2027.

- NE 18th Street (NE 141st Avenue to NE 162nd Avenue): Project is partially funded with preliminary engineering underway in 2026 and continuing into 2027.

Policies

Key Policies from Transportation System Plan

Adopted Jan. 8, 2024

TN1 - 15-Minute Neighborhoods: Make walking, rolling, and small mobility convenient through mixed-use zoning and investment in complete corridors to serve all travel modes. Foster redevelopment within strategic development nodes to support 15-minute neighborhoods.

TN2 - Climate Corridors: Develop climate corridors to mitigate climate impacts through greener streets, street tree canopies, natural plantings for stormwater management, linear parks, and other climate resilient techniques. Use City-owned right-of-way to create a network of corridors that support climate adaptation and safe and healthy mobility as climate change occurs.

TN3 - Community Streets: Develop guidance and encouragement for community use of the right-of-way, including plazas, parklets, “streateries,” open streets events, public art, and demonstration projects.

CC1 - Complete Corridors: Create complete corridors throughout the city that connect growth areas, support business, serve transit, and increase safety. Corridors connect destinations and include identifying parallel options.

CC2 - People-Based Metrics: Plan, design, and evaluate projects and developments using people-focused metrics that prioritize person throughput, safety and comfort. Use the metrics to evaluate facility performance and post-project evaluations.

CC3 - Street Standards: Adopt street standards that create comfortable, inviting multimodal streets. Use NACTO standards as primary guidance and integrate the latest best practices from WSDOT, AASHTO, and MUTCD for facility selection and design, traffic control, and signage and striping. Adopt into standard plans referenced in VMC Title 11.

CC4 - Vision Zero: Adopt a Vision Zero policy committing to end traffic fatalities and serious injuries on Vancouver streets by 2040. This policy would be a resolution to address the intersecting factors that lead to fatal crashes, such as unsafe behavior, alcohol and drug impairment, street design, and traffic speeds.

CC5 - Project Delivery: Deliver maintenance, capital, and development projects in an effective, efficient manner with clear and transparent communication to the community.

T1 - Access to Transit: Prioritize sidewalk and crosswalk gaps adjacent to transit stops, particularly along equity routes. Identify first/last mile barriers to major transit stops and address on a rolling basis.

T2 - Enhanced Transit Corridors: In coordination with C-TRAN, build a network of Enhanced Transit Corridors where higher level of transit service (frequency, hours of operation, stop amenities) are desired based on existing and future density and equity needs.

T3 - Transit and Land Use: Support transit through compact land uses and policies that incentivize transit use.

T4 - Microtransit: Integrate shared and emerging mobility technology and tools with C-TRAN microtransit zones to provide a suite of mobility options, especially in lower-density areas without high-frequency transit.

LS1 - Low-Stress Bicycle and Small Mobility Network: Adopt a citywide low-stress BSM network that prioritizes safety and comfort for people of all ages and abilities. Target a density of low-stress facilities every half-mile.

LS2 - Pedestrian Priority Streets: Adopt a network of Pedestrian Priority streets where safety and comfort for people walking and rolling is prioritized. Assign categories (primary, secondary) based on the roadway classification, level of demand, and existing and planned land uses. Use these categories to recommend desired facilities and amenities (shade, lighting, seating, etc.).

LS3 - Active Transportation Navigation: Support walking, rolling, and small mobility by making it easy and intuitive to navigate the city and find destinations.

LS4 - Small Mobility and Walking/Rolling Programming: Complement infrastructure with robust programming that encourages and educates people about the benefits of walking, rolling, and small mobility.

G1 - Development Review: Work with development community to establish a shared set of requirements and expectations for how development can support transportation.

G2 - Citywide Parking Policy & Code: Update parking code and policies to right-size the amount of parking developed with future growth and create safe streets, compact urban form, and encourage non-driving forms of transportation.

G3 - Parking Management: Effectively manage on and off-street parking resources through adoption of policies, systems, and tools throughout the city.

G4 - Downtown Parking: For those who drive downtown, create a user-friendly, well-managed, and rightsized “park once” environment where people can walk or roll between destinations without moving their car.

G5 - Transportation Demand Management (TDM): Require transportation demand management to reduce drive-alone trips, offer all travelers more mobility choices, and incentivize behavior change to more walking and rolling, biking, carpooling, and transit trips.

F1 - Data Collection and Monitoring: Use data to track travel pattern changes over time.

F2 - Climate Impacts: Adopt policies that will help meet the City's goal of zero carbon emissions by 2040.

F3 - Technology for System Management: Embrace technology as a way of managing the transportation system without expanding capacity.

F4 - Electric/Autonomous Vehicles: Set City policy around EV / AV usage and role in achieving climate goals.

F5 - Emerging Mobility: Update City policies for how shared mobility and emerging mobility vendors shall operate in Vancouver. Create data standards, data sharing agreements, and vendor requirements. Integrate equity through reduced costs for people with low incomes.

F6 - Curb Management: Develop policies and programs that efficiently manage valuable curb space, recognizing how changing travel patterns have placed high demands on this resource.

Comprehensive Plan Policy for Asset Management

"Vancouver Comprehensive Plan 2011-2030", Adopted Dec. 16, 2013

PFS-35 - City public facility assets shall be systematically managed to balance full life cycle costs, performance, risk, and service levels, using best management practices and data.

Financial Policies for Capital Planning and Asset Management

Adopted Dec. 2, 2024

Asset management is a systematic process whereby the assets of the City (e.g., water system, sewer system, transportation system, property, buildings, etc.) are operated, maintained, replaced and upgraded cost-effectively. It includes operations and maintenance costs, as well as capital investments which can take the form of new construction, rehabilitation, or replacement.

1. In pursuit of an asset management strategy that prioritizes safety, equity and climate action, the City will:

    - Consider the climate impacts of asset investments and pursue asset management strategies that reduce its contribution to climate change over time.

    - Consider equity impacts of capital projects and asset management strategies and prioritize investments that improve equity within the City.

    - Consider the potential improvements to community safety associated with capital investments and prioritize investments that improve community safety, particularly in the transportation system.

2. Asset management best practice involves managing the performance, risk, and expenditures on infrastructure assets in an optimal and sustainable manner throughout their lifecycle covering planning, design, construction, operation, maintenance, and disposal. The City shall integrate the principles and best practices of asset management such as those embodied in the International Infrastructure Management Manual or equivalent methodology in the management of its assets. Asset inventory will be maintained with maintenance, repair and deferred maintenance costs identified and updated on an annual basis. Maintenance of City assets shall be addressed on a current need, rather than deferred into the future.

3. The resources that support current outstanding debt on street improvement projects shall, once that debt is retired, be dedicated to ongoing support of the capital program of the City's street fund. Eligible uses shall be consistent with the City's adopted Transportation System Plan, Comprehensive Plan, and annually updated six-year transportation improvement program.

4. A **six-year city-wide Capital Improvement Program** shall be developed annually and shall provide a prioritized list of reasonably funded projects and those in process of securing funding. Capital improvement plans for utility assets shall be updated no less frequently than every two years. The comprehensive plan will identify longer-term capital needs by program area.

5. Funding for capital projects, including major facilities maintenance projects, will be allocated in a manner that balances community needs with city priorities, the potential for attracting matching funds, and the ability to reduce or limit expenses in future years.

6. The City's objective is to incorporate a "pay-as-you-go" approach (using available cash and current resources) in the Capital Improvement Program. Proceeds from the sale of city capital assets no longer utilized in operations will be deposited consistent with the initial ownership of the asset and invested in the highest priority city capital projects. Debt funding shall be considered for large capital projects with long useful life to better reflect inter-generational equity.

7. The capital budget will be adopted at the same time the City operating budget is adopted. The capital budget will only include fully funded projects. The capital budget will only contain projects identified in the Capital Improvement Program.

8. A **capital repair appropriation** will be maintained for unanticipated major repairs of general operating facilities and for emergency replacement of general fund equipment. Additions to the capital repair contingency reserve will be made based on council directions.

9. Impacts on net annual operating and maintenance costs will be identified as part of the funding considerations for new capital projects such as buildings, parks, and street enhancements. This includes identifying potential reductions in maintenance costs if improvements are funded. The necessary funds to operate the capital facility will be identified at the time the capital budget is adopted.

10. To provide long-term sustainable utility services, the City will structure utility rates so that system reinvestment including major repair, rehabilitation and replacement of utility assets can be fully funded on an ongoing basis in accordance with the City's "pay as you go" policy. This will be achieved through a plan of smaller incremental rate increases to maintain affordability. As identified by the utility capital improvement plan, rates will also include an investment component for capacity improvements and system expansion.

11. A **system development reserve** will be maintained to fund growth related capital costs. All systems development charge revenue will be contributed to the fund.

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Title VI Policy Statement

It is the policy of City of Vancouver that no person shall, on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of City of Vancouver as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of City of Vancouver, including its contractors and anyone who acts on behalf of City of Vancouver. This policy also applies to the operations of any department or agency to which City of Vancouver extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly, neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; 28 CFR 50.3 and 49 CFR part 21.

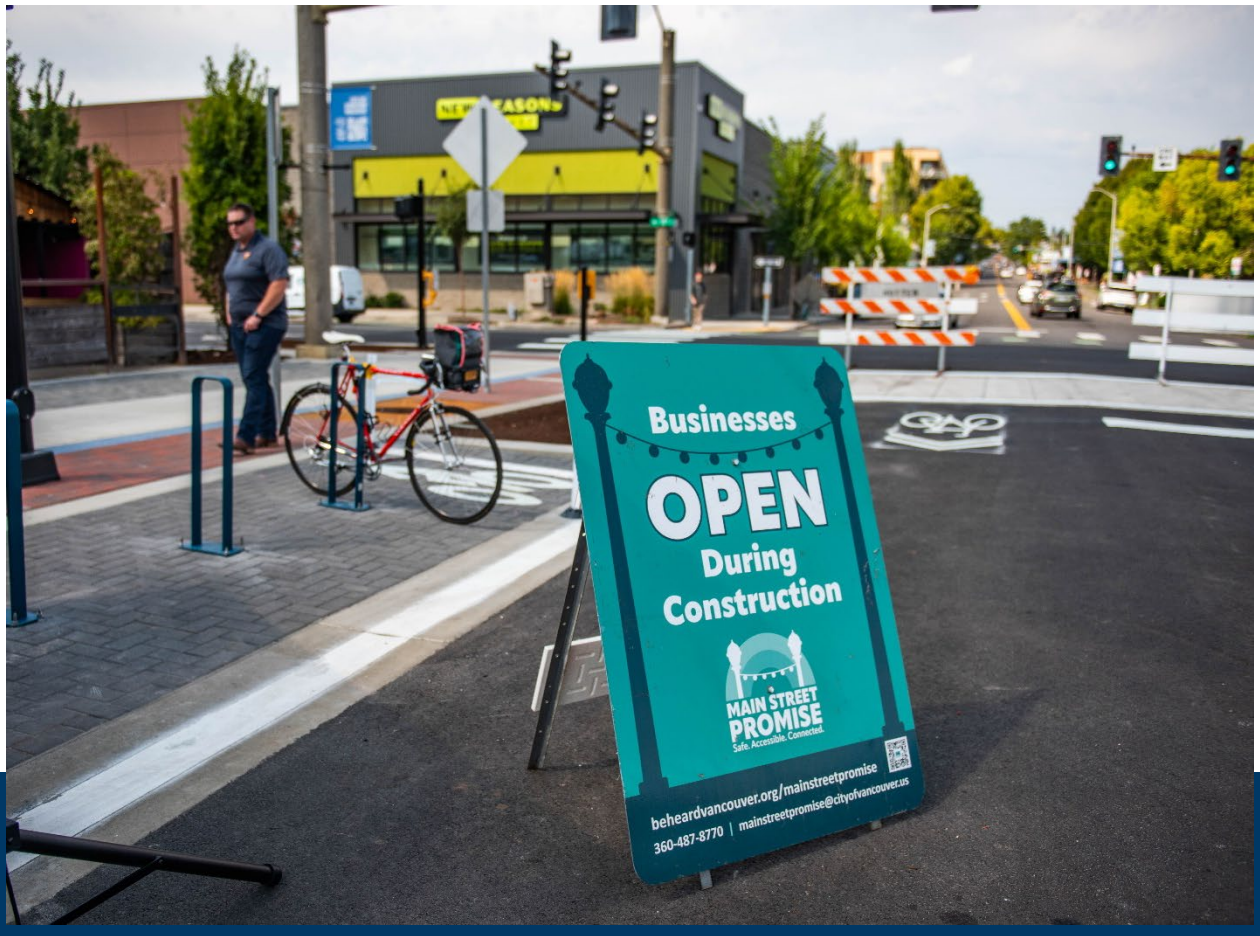
Signed by:

02BF78E9C0DB4DB...

12/12/2025

Lon Pluckhahn, City Manager — Date

Public Outreach Section



Public Outreach

The City of Vancouver engages and educates the public on current and future projects in hopes to gain feedback and comments. There is an online Project Dashboard available for reviewing all projects listed in the TIP as well as all utility projects in our 6-Year Capital Improvement Program. There have been efforts to reach out to community organizations and partners serving historically excluded and underrepresented communities. Our outreach channels include, but are not limited to neighborhood associations, community-based organizations, Be Heard website, newsletters, and social media. The Transportation and Mobility Commission and City Council are informed of the overall progress of the TIP throughout the year and provide feedback and suggestions. TIP suggestions and questions can be submitted on the TIP Comment Form for consideration.

Public Comments and Responses for 2027-2032 TIP

Comment 3/6/2025:
I'm unsure if this is the correct channel for this request, but I believe Andresen, north of Mill Plain, would benefit from traffic calming. Specifically, I think a radar speed sign would work well, but I am not a professional! The road is 35MPH, but folks really accelerate from Mill Plain, north on Andresen, toward Burnt Bridge Creek. There is no specific time, it is quite frequent. A motor cycle was completely destroyed a few weeks ago. The rider was taken away in an ambulance. I encourage you to come out and see how fast people take off on Andresen, down the hill toward Mill Plain, and back.

Response:
Thanks for sharing your concerns regarding speeding on Andresen. We've noticed that as well – especially in the more recent years. We typically do not put traffic calming on our arterial streets due to the large volumes of traffic on these corridors as well as these corridors serving as primary EMS response routes. As such, we look for other measures to help reduce speeding such as targeted enforcement and radar feedback signs that remind drivers how fast they're travelling. I will initiate the process to have one of those signs installed for the northbound direction since I suspect that is where many are exceeding the limit. I'll also share this information with our VPD Traffic Unit so they can add this to their targeted enforcement list.

Comment (follow-up to response above) 5/26/2025:
Checking in on this as nicer weather seems to encourage speeders. I totally understand there may be a lengthy process to install a radar feedback sign, but would like to know the likelihood of one being installed and an approximate timeline, if possible.

Response:
The radar feedback signs have been ordered. These are taking about 4-5 months for delivery.

Comment 5/13/2025:
Project location to include in TIP:
Techcenter, I work in the area and do t always geel safr walking die to people driving, especially at the 4 way stop near HP that needs some looking at and really a lpt of that area. People are hardly going 25, usually 40+ through there, with other area closures lots of people are cutting through there. Speed bumps would be a great addition through there!!!!

Typically travel around the community by:
Drive and walk

> **Response:**
> Thank you for sharing your concerns regarding traffic conditions on Tech Center Drive. We've recently added mobility lanes to this corridor between Tech Center Place and Mill Plain Blvd to improve the safety of those that travel using a bicycle or other small mobility device. We will evaluate the speeds of cars travelling along the corridor to see if additional improvements are needed to address pedestrian safety.

Comment 5/14/2025:
Remove from TIP:
NE 112th Ave. – McGillivary

Need the most improvement:
Everywhere. Especially NE 112th between 18th & SR 500. And NE 28st between NE 112th and NE 138th

Typically travel around the community by:
Car

Community's transportation needs:
Stop the happy projects and fix what we got. Our roads are falling apart before our eyes. Getting weary of dodging potholes on almost every street in East Vancouver.

> **Response:**
> Thank you for your feedback. NE 112th Avenue between Mill Plain Blvd and NE 28th Street is scheduled for pavement resurfacing and other corridor improvements in 2027. The segment of NE 112th Avenue from NE 28th Street to SR-500 will be resurfaced in the coming years. The segment of NE 28th Street from NE 112th Avenue to NE 138th Avenue is scheduled for pavement resurfacing in 2028.

Comment 8/27/2025:
Project location to include in TIP:
I live in Lincoln neighborhood and am most concerned about 39th Street between Main and Fruit Valley Road. Particularly after the light at Columbia going to Fruit Valley Road -- drivers are going too fast. It feels unsafe to cross as a pedestrian, even at times of day I would expect to be quiet. We need more speed limit signs, maybe some more of those blinky "slow down" ones, some sort of traffic calming, flashing lights or similar for crosswalks for bikes and pedestrians, a traffic light maybe at Kauffman.

Proposed project in TIP most benefit our community:
Lots of good ones. The interactive map is a great resource. Love seeing the recent speed bumps on Lincoln between 39th and however far they go.

Need the most improvement:
Traffic control to slow vehicles or safer crossing at 39th and Kauffman. More speed control on NW 45th street between Main and Lincoln. People go really fast and the elementary schools create a lot of traffic. 39th and Main Street are pretty backed up during rush hour but I think that's growing in the community.

Typically travel around the community by:
Mostly car and walking. Drive to 99th street transit center for CTRAN commute to Portland.

Response:
Thank you for your feedback. Over the past two decades, the City has made significant investments in the 39th Street corridor between I-5 and Fruit Valley Road to make this corridor safer for pedestrians, bicyclists and other vulnerable roadway users. We're continuing that work with the installation of a new enhanced pedestrian crossing on 39th Street at its intersection with Daniels Street to improve safety for pedestrians crossing 39th Street to access nearby Lincoln Elementary School. We're also evaluating the actual speed of vehicles moving through the corridor to determine if additional measures are needed to address speeding.

Comment 9/1/2025:
Proposed project in TIP most benefit our community:
39th and Fruit Valley RD. needs an all-around signal/ crosswalk light. This would increase safety by a busy industrial intersection near a 39th and Fruit Valley RD. needs an all-around signal/ crosswalk light. This would increase safety by a busy industrial intersection near a school zone which has high truck traffic.

Need the most improvement:
39th and Fruit Valley RD. needs an all-around signal/ crosswalk light. This would increase safety by a busy industrial intersection near a 39th and Fruit Valley RD. needs an all-around signal/ crosswalk light. This would increase safety by a busy industrial intersection near a school zone which has high truck traffic.

Typically travel around the community by:
Both e-bike and drive people driving too fast and people and bikes need a safer condition.

Response:
Thank you for your feedback. The City is currently analyzing the Fruit Valley Road corridor to determine what additional safety measures are needed to address both vehicle and pedestrian/mobility safety. This analysis will consider additional enhanced (signalized) pedestrian crossings of Fruit Valley Road including the intersection with W. 39th Street. We will also analyze this intersection to determine

whether the warrants for a new traffic signal are being met. We're also advancing a project that will eventually construct a parallel freight route west of Fruit Valley Road. This new route would take most of the freight traffic off Fruit Valley Road, lessening the impacts to the school, park and neighborhood and making the Fruit Valley Road corridor safer for everyone.

Comment 1/7/2026:
Need the most improvement:
The traffic light on 5th St. for the on ramp to I-5 is way too short. It is only 10 seconds and at most gets two cars through it before it turns red again. When traffic is heavy from Washington St. south, cars blocking the intersection don't even have time to clear out before the light for 5th St. goes red again. Can you please assess this and modestly lengthen the time of this light? Thanks for your consideration.

Typically travel around the community by:
Walk, but occasionally need to go into Portland and we are tied up with the short on ramp light.

Response:
Thank you for your feedback. City staff reviewed the intersection and determined it was under the jurisdiction of the Washington State Department of Transportation (WSDOT). WSDOT was made aware of the issue and has since made corrections to the signal timing and phasing.

Comment 4/8/2026:
Project location to include in TIP:
Evergreen Highway from Columbia Hatchery to 164th

Proposed project in TIP most benefit our community:
YES, Project 714 in the TIP is listed as unfunded. I am requesting that it be placed as "partially funded'. I am requesting a final engineering study be performed on the road to supplement our pre-engineering study and our neighborhood action plan. With this and agency write-offs, the Evergreen Highway Multi-Use Path would be shovel-ready, and our project would be completed in 5-6 years. Evergreen Highway in 2025 has had 3 deaths and a very high number of serious injuries. We have more traffic on this 714 route than on the route west of Ellsworth. In addition to high traffic, we have a high number of DUI arrests in our neighborhood. All working toward a very unsafe road for pedestrians, children, and bicyclists.

Need the most improvement:
Evergreen Highway, from the hatchery to 164th, needs a multi-use path.

Typically travel around the community by:
Car for groceries, walk for exercise, bike for fun

Community's transportation needs:
As a community, we were asked to participate in many action plans from the City. We participated. We are listed on every major action plan as a point of pride that we are a bike and pedestrian-friendly city. Yet since 2011, our neighborhood has been promised,

but other projects are now ahead of us. I would ask that the City prioritize our project and fulfill the promises to an overburdened community. We want to help, but we need this status change to take place so we can help. Otherwise, we are unable to gain grants from the Federal and State governments, and more people will die and be seriously injured on the Evergreen Highway. If our status were moved to partially funded, we could complete this project in 5 years because we are very close to being shovel-ready.

Response:
Thank you for your feedback. Over the past 20 years, the City has been working to advance multiple sections of the Evergreen Highway trail as funding becomes available. We are currently working on the segment between Chelsea Avenue and Image Road with the assistance of federal funding through the Southwest Washington Regional Transportation Council. We will continue to pursue additional funding opportunities for the remaining sections of the trail including the section between the Columbia Springs Fish Hatchery and SE 164th Avenue and once those funds have been secured, we can advance those projects into construction.

Comment 4/8/2026:
Project location to include in TIP:
Evergreen Highway from Columbia Hatchery to 164th

Proposed project in TIP most benefit our community:
YES, Trans ID #0741 in the TIP is listed as unfunded. I am requesting that it be placed as "partially funded'. I am requesting a final engineering study be performed on the road to supplement our pre-engineering study and our neighborhood action plan. With this and agency approvals, the Evergreen Highway Multi-Use Path would be shovel-ready, and our project would be completed in 5-6 years.

Need the most improvement:
Evergreen Highway, from the hatchery to 164th, needs a multi-use path.

Typically travel around the community by:
Car for groceries, walk for exercise, bike for fun

Community's transportation needs:
Yes, please move project 741 from the TIP to partially funded. This has been our community's #1 goal since 2011. We have cooperated with the city all along and have seen other projects completed before our project. We are listed on every major action plan of the city, yet we wait. Although we are grateful for the work that should be completed in 2026 for funding, this section of the road has fewer deaths and serious injuries, lighter traffic loads and DUI than Trans ID#0741. Literally, people are dying and seriously injured crossing the street. It has been this way for years. By moving Trans ID #0741, we will qualify for grants from the federal and state governments. It will save people's lives.

Response:
Thank you for your feedback. Over the past 20 years, the City has been working to advance multiple sections of the Evergreen Highway trail as funding becomes available. We are currently working on the segment between Chelsea Avenue and

Image Road with the assistance of federal funding through the Southwest Washington Regional Transportation Council. We will continue to pursue additional funding opportunities for the remaining sections of the trail including the section between the Columbia Springs Fish Hatchery and SE 164th Avenue and once those funds have been secured, we can advance those projects into construction.

Comment 4/16/2026:
Project location to include in TIP:
Build Project #0741, the current roadway is very dangerous for pedestrians

Proposed project in TIP most benefit our community:
Build Project #0741, the current roadway is very dangerous for pedestrians

Need the most improvement:
Evergreen highway

Response:
Thank you for your feedback. Over the past 20 years, the City has been working to advance multiple sections of the Evergreen Highway trail as funding becomes available. We are currently working on the segment between Chelsea Avenue and Image Road with the assistance of federal funding through the Southwest Washington Regional Transportation Council. We will continue to pursue additional funding opportunities for the remaining sections of the trail including the section between the Columbia Springs Fish Hatchery and SE 164th Avenue and once those funds have been secured, we can advance those projects into construction.

Comment 4/17/2026:
Project location to include in TIP:
07140

Proposed project in TIP most benefit our community:
0714

Need the most improvement:
East Old Evergreen Highway from the Fish Hatchery to 164th

Typically travel around the community by:
Car

Response:
Thank you for your feedback. Over the past 20 years, the City has been working to advance multiple sections of the Evergreen Highway trail as funding becomes available. We are currently working on the segment between Chelsea Avenue and Image Road with the assistance of federal funding through the Southwest Washington Regional Transportation Council. We will continue to pursue additional funding opportunities for the remaining sections of the trail including the section

between the Columbia Springs Fish Hatchery and SE 164th Avenue and once those funds have been secured, we can advance those projects into construction.

Comment 4/27/2026:
Project location to include in TIP:
~ AI conversation with commenter on City's bike network not included. ~
Yes this was a conversation with AI but its point is that the city is not doing its part to make a cohesive network. So, I suggest that we complete on project instead of starting new ones and more new and more new ones. Finish what is started first.

Need the most improvement:
Mill Plain and Brant, Andresen and Fourth Plain

Typically travel around the community by:
I make it a point to drive the same amount of miles as I ride my bike, Effectively turning my car into a hybrid.

Community's transportation needs:
Complete one project before starting a new one. The new three bike lanes near Burton road are lanes to no where. I understand they are probably federally funded but stop lollygaging. If the city wants to create a multi modal city then they have to start with completing a project. Connect the corridors.

Response:
Thank you for sharing your concerns. The city is implementing new and improved mobility lanes along our city streets through a number of programs and processes including our pavement management program, our capital improvement program and our complete streets program. By leveraging the funding from these existing programs, the city is able to implement a greater number of mobility improvements throughout our community. However, this does result in somewhat of a patchwork of improvements with a lot of disconnect. Over time, the City will endeavor to link all of these routes together to create a cohesive mobility network.

Financial Analysis Section



Financial Analysis

Funding Overview

The City of Vancouver's Transportation Improvement Program consists of three different project lists: funded projects, partially funded projects, and unfunded projects. Projects on the funded list are considered fully funded for design, right-of-way acquisition, and construction. Projects on the partially funded list have funding for design and/or right-of-way acquisition, but do not have full funding for the construction phase. Projects on the unfunded list do not have any funding allocated to them at this time. The City has refined the unfunded project list to projects that may receive funding in the 6-year horizon. Projects outside the 6-year horizon are on a separate project list.

Street Funding Strategy (now called Dedicated Street Funding)

Prior to 1995, the City began a street funding strategy for local revenue to use for transportation capital improvements. This strategy involved identifying a revenue source and then committing that revenue source for debt service on bonds. Proceeds from the bond sale were then leveraged with grant revenues to the maximum extent possible for transportation improvements. Coupled with impact fees and developer contributions, this strategy generated hundreds of millions worth of capital improvements but resulted in a cyclical search for new revenues to address the continued need for capital improvements. Since 2015, City Council searched for a reasonable mix of new revenue sources that could be used on a "pay-as-you-go" basis to fund capital improvements as well as halt the gradual decline in our system pavement condition index. Early in 2015, City Council established a goal to complete, by year-end *"an adopted street funding program that provides reliable, dedicated, long-term funding for streets, including pedestrian, bike and accessible infrastructure."* In late 2015, City Council enacted several revenue sources for streets including:

- Transportation Benefit District (TBD) and City Council enacted a revenue source; a $40 Vehicle License Fee. In summer 2025, the Vehicle License Fee increased to $50.
- Business License Surcharge (BLS) $20 per employee. In 2023, the City Council updated the business license surcharge calculation to said rate which was anticipated to provide additional revenue for transportation.
- Increased the Utility Tax on city-owned utilities dedicating additional revenue for streets.
- Dedicated the revenue sources used to pay debt service on bonds (as described above) would continue to be dedicated for street purposes on a pay-as-you-go basis as debt is retired.
- Dedicated the revenue from the increased gas tax resulting from the 2015 state gas tax increase would be used for median maintenance and street sweeping to accomplish service level increases for esthetic purposes.
- In 2023, the City Council and the TBD implemented a 0.01% increase to the sales tax which will bring in additional revenue for transportation.

The current Annual Report to the Vancouver Community and more information about the TBD can be found on the Transportation Benefit District website.

Local Funding Sources

Public Sources

- **Vehicle License Fee:** Fee authorized by the Vancouver Transportation Benefit District and collected by the Washington State Department of Licensing. Fee paid at time of license renewal, resulting in estimated annual revenue of $6.5 million.
- **0.01% Sales Tax:** Authorized by the Vancouver Transportation Benefit District and collected by the Washington State Department of Revenue. Tax paid on the sale of goods within the Vancouver City limits, resulting in estimated annual revenue of $6 million.
- **Motor Vehicle Fuel Tax, also known as State Gas Tax:** Typically, about $3.5 million per year.
- **Real Estate Excise Tax (REET)**: Varies per year, depending on real estate transactions.
- **Bonds (debt)**: Periodically, we sell bonds for transportation construction projects. Revenues to pay those debts come from several sources including gas tax, general fund, REET, and business license surcharge.
- **Business License Surcharge (BLS):** Beginning in 2023, we overhauled the way the BLS is calculated. Revenues are still uncertain due to the recent changes. Staff will continue to monitor revenues and plan future work accordingly.
- **Utility Tax:** 1.5% Utility Tax on gross receipts for city-owned utilities including water, sewer, surface water and solid waste. This tax raises $1.5 million annually.

Private Sources

- **Direct Construction**: Private developers are required to build or improve on-site roadways and may also be required to make off-site improvements to comply with concurrency or SEPA impacts.
- **Traffic Impact Fees (TIF)**: The City maintains a TIF program (fees paid by a developer per new trip) which historically covers about 10% of the annual construction program.
- **Proportionate Share Contributions**: Developer contributions toward an improvement project to meet concurrency or safety requirements.

Grant Programs

Federal Grant Programs

- **BUILD**: Better Utilizing Investment to Leverage Development (BUILD) Grant program from U.S. Department of Transportation for surface transportation infrastructure projects with significant local or regional impact.
- **Earmarks**: Earmarks are federal discretionary spending funds allocated by Congress for specific projects that are not required to go through the competitive grant allocation process.
- **CDBG**: Community Development Block Grant—periodically available for public street infrastructure (typically used for small sidewalk and ADA ramp improvements).

- **STBG**: Surface Transportation Block Grant funds are allocated by the SW Washington Regional Transportation Council and then, through a competitive grant process, to jurisdictions in the region.
- **USDOT Safe Streets and Roads for All (SS4A)**: To support planning, infrastructure, behavioral, and operational initiatives to prevent death and serious injury on roads and streets involving all roadway users, including pedestrians; bicyclists; public transportation, personal conveyance, and micro mobility users; motorists; and commercial vehicle operators.
- **USDOT Thriving Communities Program**: Planning, technical assistance, and capacity building support to enable communities to advance a pipeline of transformative infrastructure projects that will increase mobility, reduce pollution, and expand affordable transportation options, connecting communities to the essential opportunities and resources that will help them thrive.
- **USDOT Reconnecting Communities Program**: Advance community-centered transportation connection projects, with a priority for projects that benefit low-capacity communities, focusing on improving access to daily needs such as jobs, education, healthcare, food, nature, and recreation, and foster development and restoration, and provide technical assistance to further these goals. The primary goal is to reconnect communities harmed by past transportation infrastructure decisions, through community-supported planning activities and capital construction projects that are championed by those communities.
- There are other federal funding sources that are not listed.

State Grant Programs

- **Freight Mobility Strategic Investment Board (FMSIB):** This program provides resources to make strategic investments that support freight capacity and movement.
- **Transportation Improvement Board (TIB)**: Funded with a small portion of the state gas tax, TIB is the main source for state grant funds to state agencies. Vancouver competes with other urban jurisdictions in Washington State for funds from several TIB grant programs. For example: urban arterial; urban sidewalk; and complete street programs.
- **WSDOT Safety Routes to School**: Improve safety and mobility for children by enabling them to walk and bicycle to school. Funding from this program is for projects within two-miles of primary, middle and high schools (K-12).
- **WSDOT Pedestrian and Bicycle Program**: Improve the transportation system to enhance safety and mobility for people walking, biking, and rolling.
- **WSDOT City Safety Program**: Federal Highway Safety Improvement Program funds are allocated by the Washington State Department of Transportation (WSDOT) on a competitive basis to reduce fatal and serious injury crashes on city streets using engineering improvements and countermeasures.
- **WSDOT Regional Mobility Grant**: Supports local efforts to improve connectivity between counties and regional population centers and reduce transportation delays. The program funds: new transit services, park and ride lots, transportation demand management programs, transit speed and reliability improvements, new buses, transit service expansion.
- **WSDOT Sandy Williams Connecting Communities Program**: Improve active transportation connectivity for people walking, biking and rolling along and across

current and former state and legacy highways, focusing on communities with high equity needs, which are those communities most affected by barriers to opportunity and environmental health disparities.
- There are other state funding sources that are not listed.

Regional Programs

- **Transportation Alternative Program (TAP)**: Provides funding for alternative modes of transportation projects (i.e. modes other than vehicles) as a competitive grant process by the SW Washington Regional Transportation Council.
- There are other regional funding sources that are not listed.

Transportation Financial Data

The table and graphs on the next few pages show the historical and forecasted revenues and expenses for streets in the City of Vancouver.

STREET MAINTENANCE (Funds 102 & 103)

Street Maintenance Expenses	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
Pavement Management	5,861,428	15,826,629	13,959,111	16,522,743	16,129,836	11,315,692
Street Maintenance	6,360,787	6,951,194	7,875,518	9,355,091	9,231,311	12,526,617
Administration	1,111,056	1,087,945	1,006,780	1,222,423	1,738,820	1,767,532
Traffic Engineering	4,075,256	4,711,149	4,158,919	4,810,728	5,532,602	2,907,107
Additional Right-of-Way Maintenance	751,806	943,832	958,017	1,211,620	1,226,486	1,318,196
Sidewalk Maintenance	368,105	289,595	573,674	433,528	569,743	561,093
Transportation Design	2,277,640	953,989	1,013,935	1,053,220	1,129,066	1,488,831
Subtotal Street Maintenance Expenses	**20,806,078**	**30,764,333**	**29,545,954**	**34,609,353**	**35,557,864**	**31,885,068**
Transportation Debt Service paid by Fund 102	**-**	**255,062**	**141,157**	**139,790**	**138,422**	**137,054**
Transfers to Transportation Capital	**1,644,985**	**335,501**	**474,088**	**315,000**	**5,516,801**	**820,000**
Total Street Maintenance Expenses	**22,451,063**	**31,354,896**	**30,161,199**	**35,064,142**	**41,213,086**	**32,842,122**
Street Maintenance Revenues	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
Property Taxes	-	-	-	-	-	-
Real Estate Excise Tax (REET)	4,512,843	6,614,807	6,109,706	3,678,721	4,145,819	4,005,770
Motor Vehicle Fuel Tax	3,112,919	2,875,892	2,846,272	3,660,024	3,533,029	3,215,173
General Fund	11,274,588	13,021,019	11,497,035	15,035,110	19,914,661	17,898,525
Grants	247,106	212,661	-	1,223,726	2,264,705	25,000
*Dedicated Street Funding (DSF) - Paid off debt	1,400,000	2,200,000	2,200,000	2,200,000	2,200,000	2,200,000
*DSF - Utility Tax	2,089,970	2,283,193	2,312,305	2,315,520	2,701,032	3,089,269
*DSF - Business License Surcharge	262,245	572,275	1,005,310	287,691	331	-
*DSF - Transportation Benefit District (TBD)	-	1,600,000	1,600,000	1,600,000	1,600,000	4,466,205
*DSF - Extra Motor Vehicle Fuel Tax	473,622	476,923	480,090	256,576	255,890	481,016
Miscellaneous	1,833,364	1,366,119	1,926,711	3,361,991	4,502,214	4,534,715
Total Street Maintenance Revenues	**25,206,658**	**31,222,888**	**29,977,429**	**33,619,361**	**41,117,681**	**39,915,672**

TRANSPORTATION DEBT

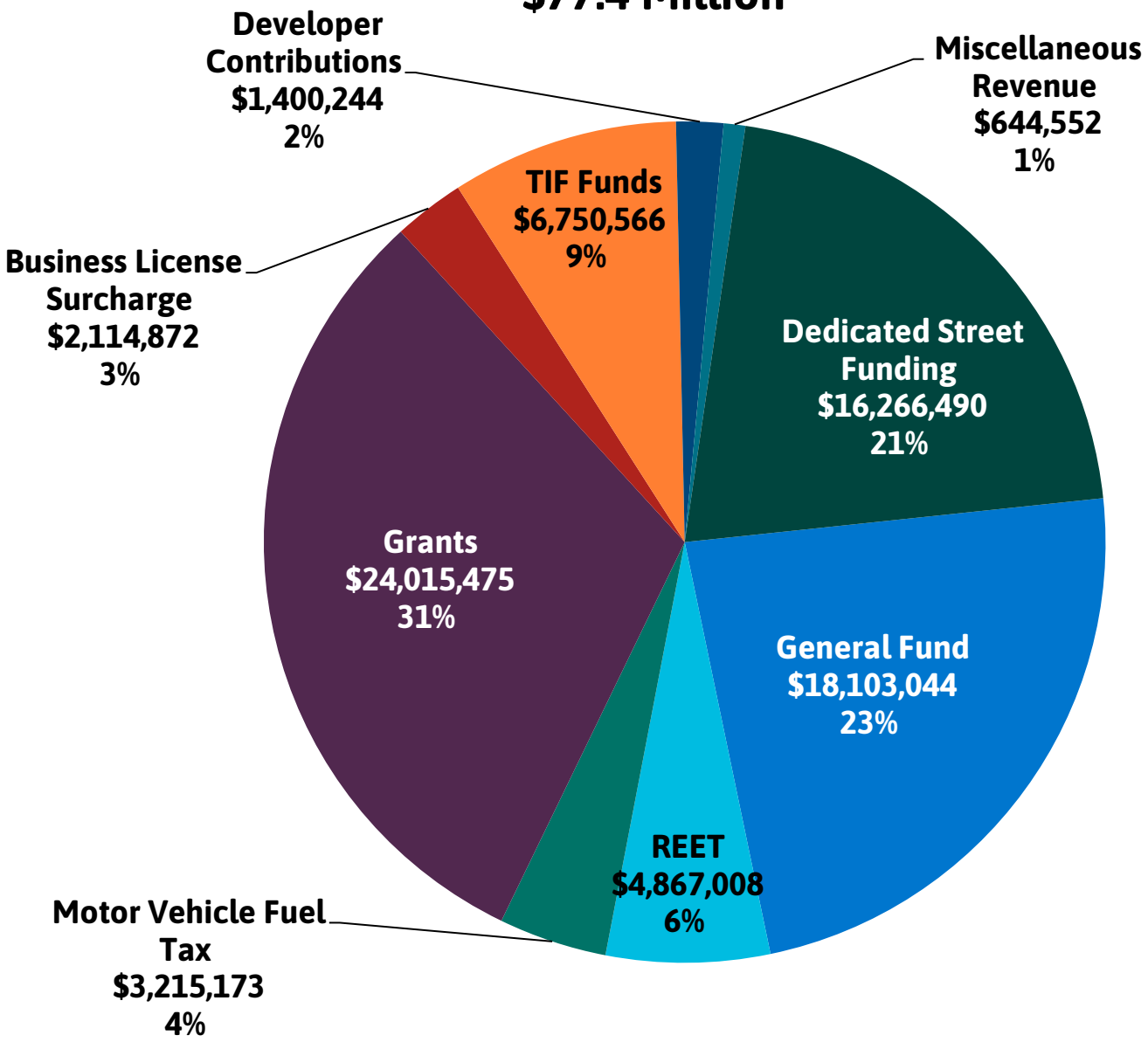
	2020	**2021**	**2022**	**2023**	**2024**	**2025**
Yearly Debt Service Expenses	**3,576,973**	**2,784,365**	**2,793,033**	**2,791,401**	**2,795,668**	**2,791,261**
Debt Service Revenues	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
General Fund	996,600	205,505	204,345	204,113	205,157	204,519
Energy Savings in Street Fund	140,000	140,000	150,000	150,000	150,000	150,000
Employee Surcharge	1,938,660	1,935,727	1,938,395	1,937,563	1,938,230	1,936,023
Motor Vehicle Fuel Tax	-	-	-	-	-	-
REET	501,713	503,133	500,293	499,725	502,281	500,719
Total Debt Service Revenues	**3,576,973**	**2,784,365**	**2,793,033**	**2,791,401**	**2,795,668**	**2,791,261**

TRANSPORTATION CAPITAL (Funds 330 & 331)

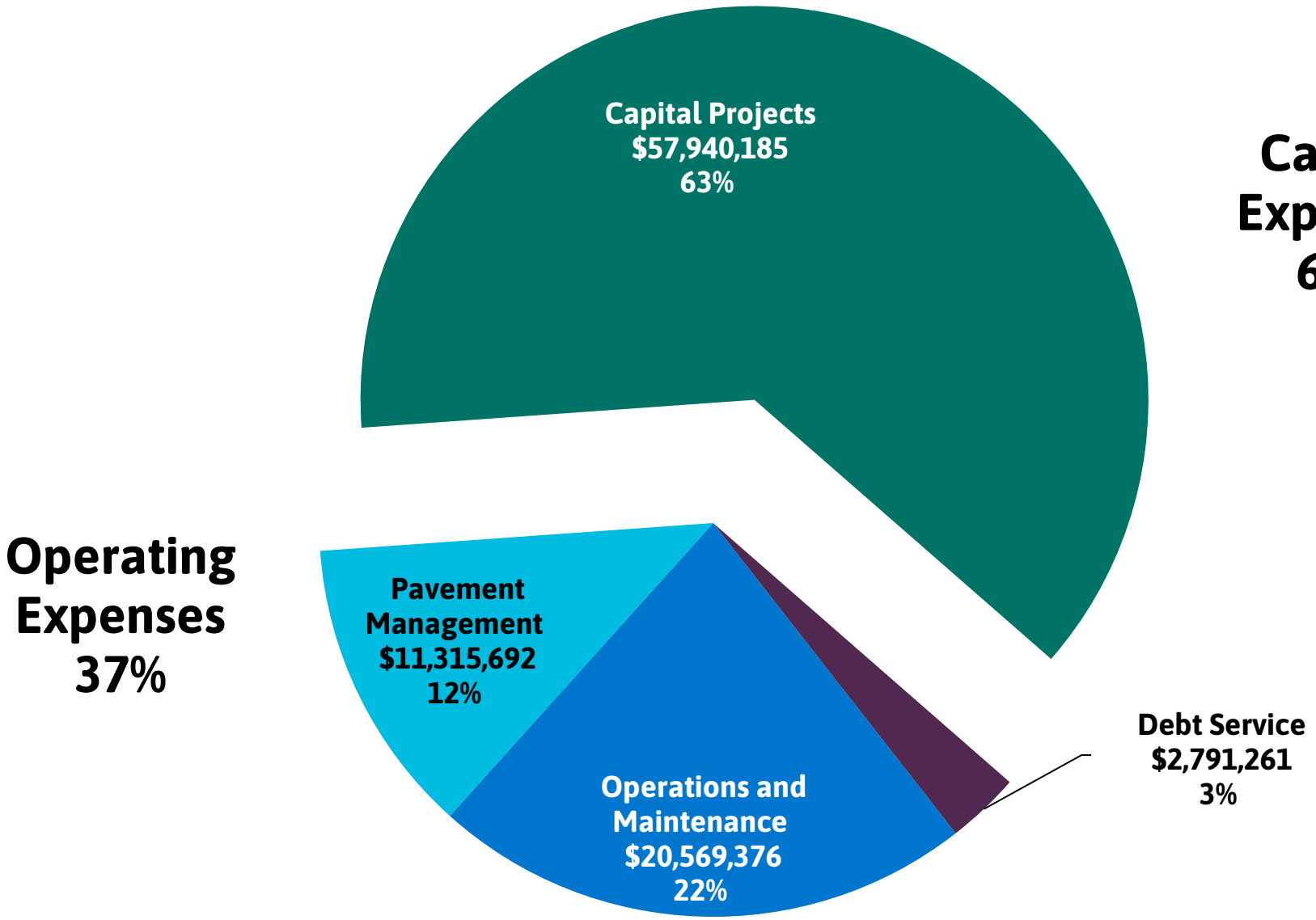
	2020	**2021**	**2022**	**2023**	**2024**	**2025**
Capital Expenses	**11,039,560**	**4,026,993**	**17,694,644**	**14,146,442**	**31,174,344**	**57,940,185**
Capital Revenues	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
REET	165,714	171,372	182,492	198,916	206,873	360,519
Grants	2,981,921	911,134	8,467,369	3,804,553	14,524,137	23,990,475
Developer Participation	503,568	98,078	526,474	449,082	457,026	1,400,244
Intergovernmental Loan Proceeds	2,855,462	-	-	-	-	-
General Fund	-	54,682	663,751	-	-	-
Street Maintenance Fund	107,181	185,000	165,000	315,000	480,000	820,000
Transportation Special Revenue Fund	123,781	119,994	642,270	288,070	200,000	178,849
Transportation Impact Fee (TIF) Funds	855,760	383,321	924,119	1,767,072	3,356,894	6,750,566
Bond Capital Fund	331,451	-	-	-	-	-
*DSF - Transportation Benefit District	2,000,000	1,330,000	4,530,000	10,605,000	10,011,000	6,030,000
*DSF - Fund 103	1,628,947	150,501	819,114	-	5,036,801	-
Sale of land	-	235,337	-	-	289,512	196,683
Miscellaneous Revenue	18,700	1,274,092	191,619	1,492,512	1,412,831	644,552
Total Capital Revenues	**11,572,484**	**4,913,510**	**17,112,207**	**18,920,205**	**35,975,073**	**40,371,889**

*Annual Report to the Vancouver Community which includes annual revenues and expenses.

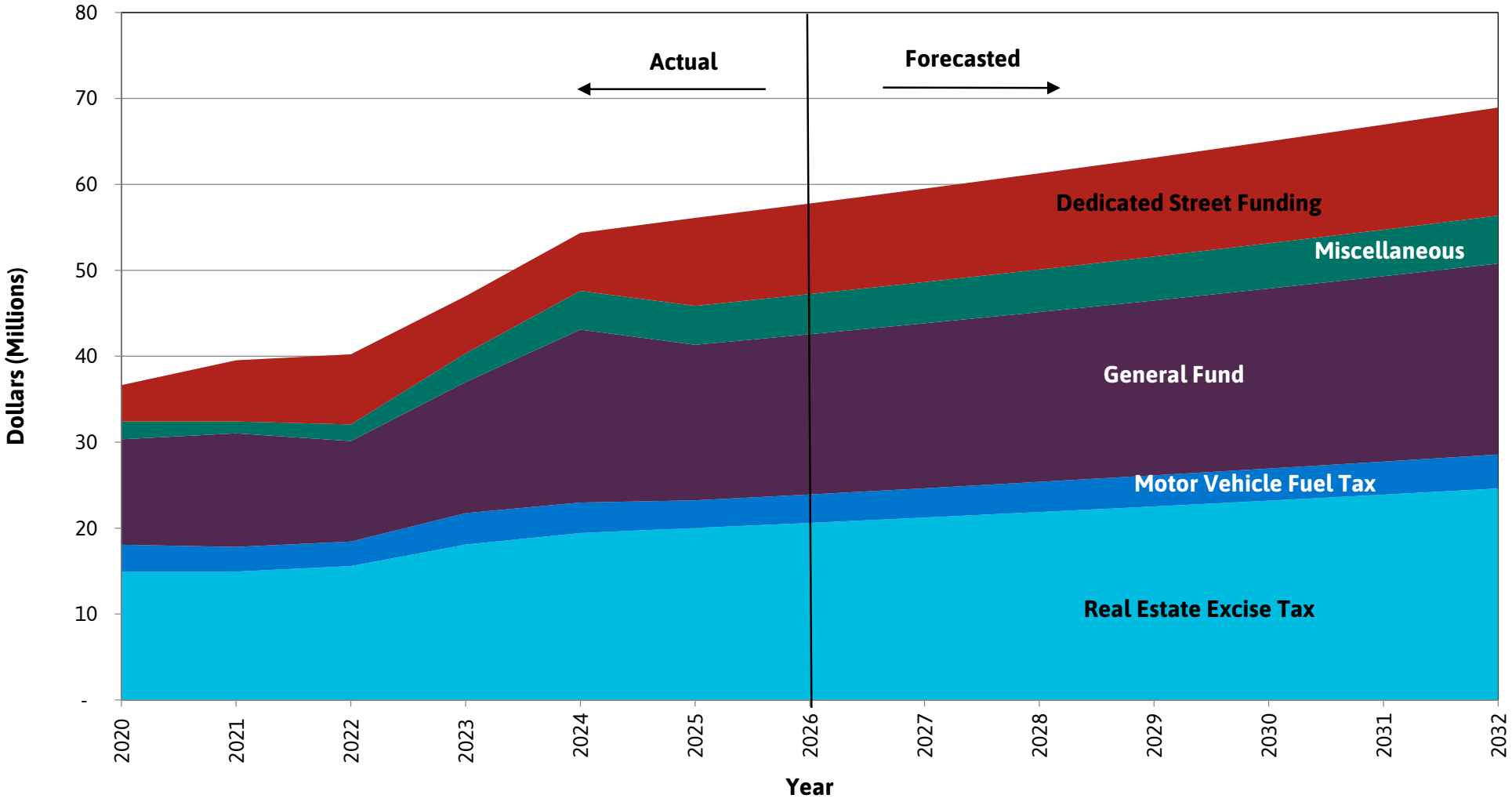
2025 Streets Revenue Operating and Capital
$77.4 Million

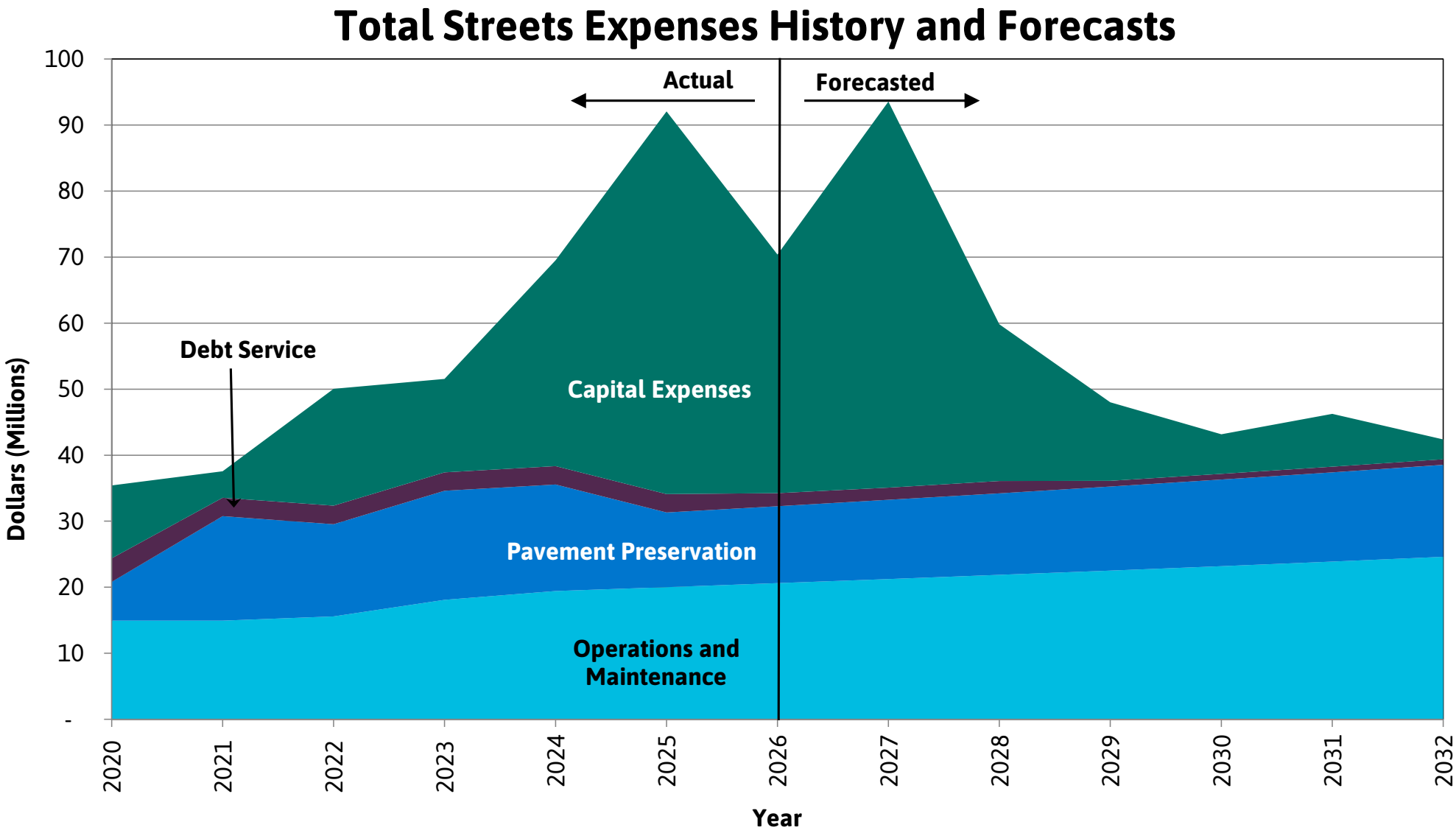


2025 Streets Expenses Operating and Capital
$92.6 Million

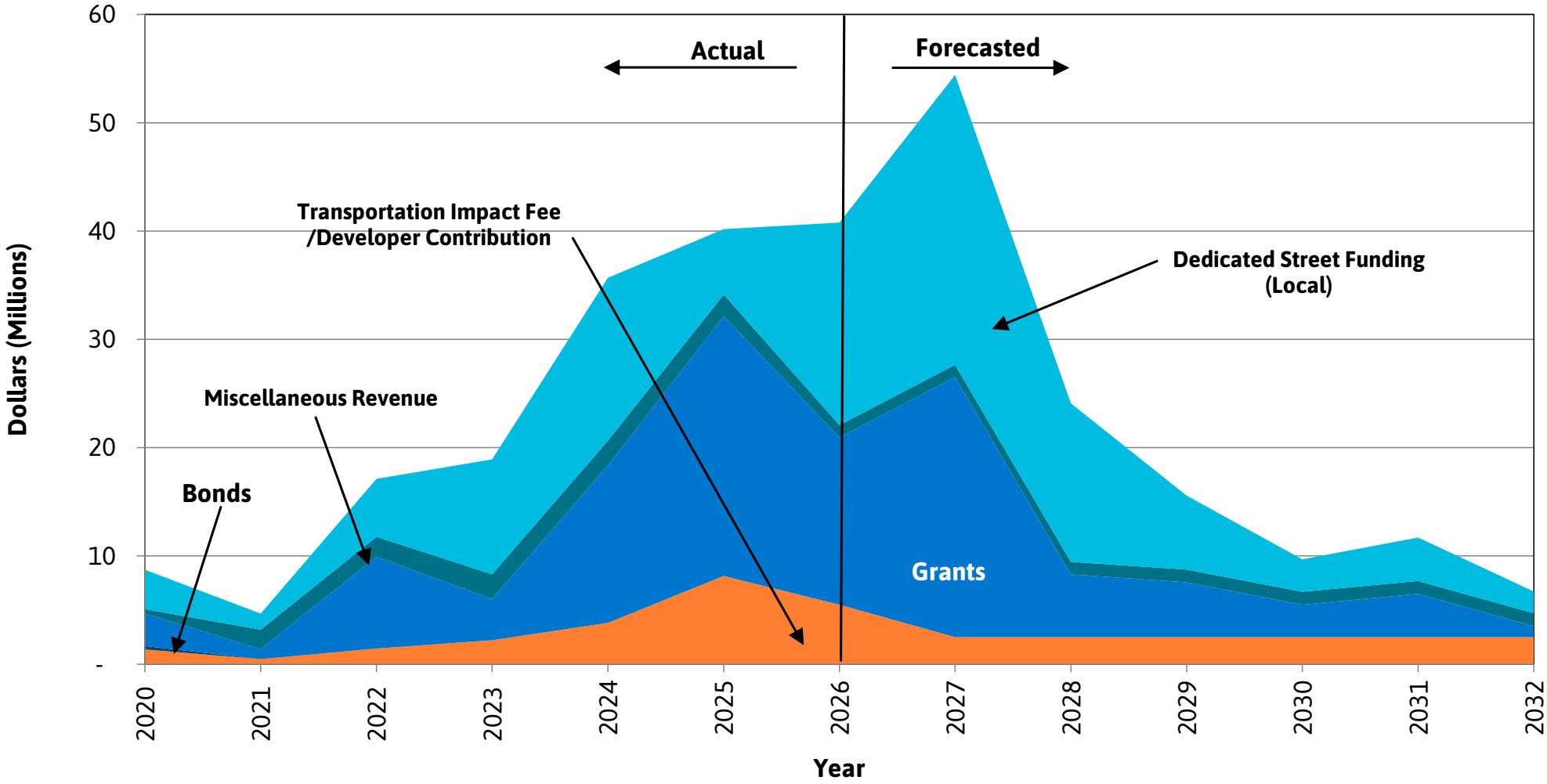


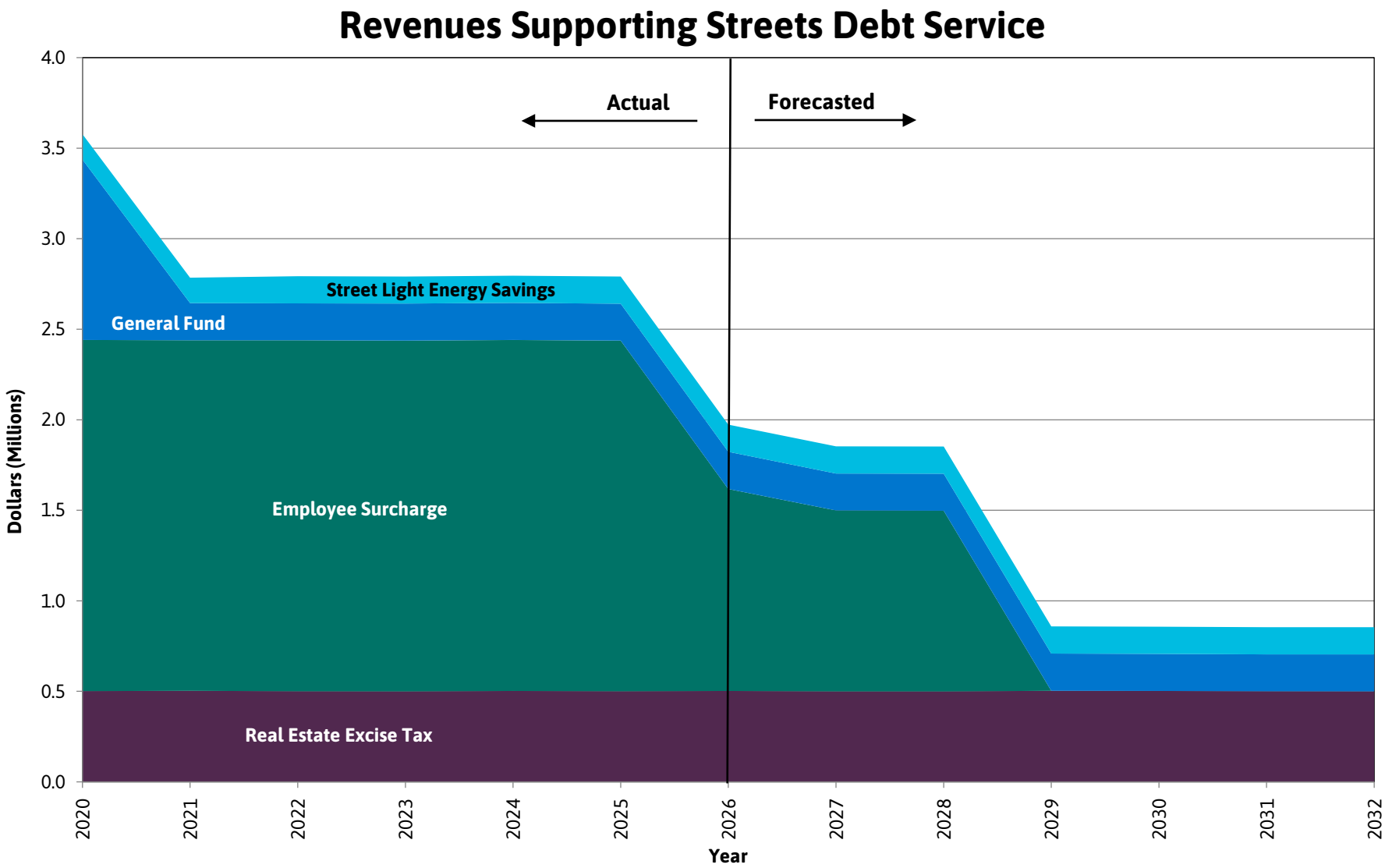
Revenue Supporting Street Operations, Pavement Preservation, and Debt Service




Total Streets Expenses History and Forecasts
Actual
Forecasted
Debt Service
Capital Expenses
Pavement Preservation
Operations and Maintenance
Dollars (Millions)
100
90
80
70
60
50
40
30
20
10
-
2020
2021
2022
2023
2024
2025
2026
2027
2028
2029
2030
2031
2032
Year

Revenues Supporting Streets Capital Projects & Programs




Revenues Supporting Streets Debt Service
Actual
Forecasted
Street Light Energy Savings
General Fund
Employee Surcharge
Real Estate Excise Tax
Dollars (Millions)
Year
4.0
3.5
3.0
2.5
2.0
1.5
1.0
0.5
0.0
2020
2021
2022
2023
2024
2025
2026
2027
2028
2029
2030
2031
2032

Project Implementation Section



Project Implementation

Transportation capital improvement projects are added to the TIP through various sources. Sources may include the Transportation System Plan, Strategic Plan, Subarea/Corridor Plans, safety issues identified through the Local Road Safety Plan, congestion issues, private development, and public comments. Projects are vetted by transportation planning and public works staff and added to the TIP accordingly.

After projects are added to the TIP, opportunities are explored for funding and coordination with other work (for example pavement management or utility work). Project prioritizations are based on policy priorities, community impacts, feasibility and funding availability. Public outreach is most robust during the creation of the plans that identify these projects but are continued throughout the entire life cycle of the project. Once projects are fully funded and designed, construction can commence.

Community Engagement

The City is committed to equitable, accessible and transparent community engagement as a core part of development transportation plans and policies and complies with the Title VI of the Civil Rights Act of 1964, which requires equitable, fair and non-discriminatory community engagement.

The TIP Program is comprised of projects that have been identified through earlier processes and programs. As part of the annual TIP updated, the City reaches out to stakeholders, provides an interactive project dashboard for exploring the TIP projects, and responds to comments.

Updated information is provided on projects during construction through city websites, list serves, and other communication channels. Directly impacted community members are notified about construction projects in their area.

TIP Prioritization Section



TIP Prioritization Process

The City is utilizing a similar prioritization process that was used to score the Transportation System Plan (TSP) projects in 2023. The TIP Prioritization process organizes existing and potential transportation projects for the City in alignment with our strategic goals and policies. Scoring criterion are created to reflect our strategic goals, policies, and management directives. Each project is scored on all the criteria which helps ensure fair comparisons. The result is a transparent and defensible decision-making tool to allocate limited resources to long list of worthy project priorities.

The partially funded and near-term unfunded projects are scored. The scores for those projects can be found on the left side of the project lists. Fully funded projects are not scored because we have already obtained the resources necessary to construct them.

Prioritization Tool

The prioritization tool includes three phases. Phase 1 is geographic screening, phase 2 is implementation, and phase 3 is a correlation between the cost and benefits.

Phase 1 is geographic screening which helps determine where to focus the investment. The criteria consist of equity index, collisions, essential spaces and places, and future growth areas. Essential places may include schools, parks, trails, natural areas, community centers or other factors.

Phase 2 is implementation which helps determine when to invest. The criteria consist of pavement opportunities, coordination, quick wins, right-of-way impacts, environmental impacts. Quick wins may be extending a bike network or closing a sidewalk gap. Environmental impacts refer to critical and archeological areas.

Phase 3 is a correlation between the cost and benefits. Phase 1 and 2 added together are the benefits. The cost is the estimated total project cost. Grants and other funding (e.g. developer contributions) are incorporated if applicable. The table below is how the correlation between cost and benefits are utilized in determining the priority groups.

Cost and Benefit Correlation Table

	Very Low Benefit	Low Benefit	Medium Benefit	High Benefit	Very High Benefit
Very High Cost	Long-term	Long-term	Long-term	Medium-term	Near-term
High Cost	Long-term	Long-term	Medium-term	Near-term	Near-term
Medium Cost	Long-term	Medium-term	Medium-term	Near-term	Near-term
Low Cost	Long-term	Medium-term	Near-term	Near-term	Near-term
Very Low Cost	Medium-term	Medium-term	Near-term	Near-term	Near-term

Prioritize Projects

The final step of the TIP prioritization process consists of organizing the projects into priority groups: near-, medium-, and long-term. The near-term projects should be prioritized and included in the 6-year TIP. The medium- and long-term priority projects will be completed in

the 6 to 20-year horizon as funding allows. Although there are instances where medium- and long-term priority projects receive funding and are added to the 6-year TIP. Staff will continually evaluate the prioritization process to ensure that the priorities align with City goals.

2027-2032 TIP Priority Group Scoring Summary

1. Funded List – Not scored since we already have dedicated funds committed to build.
2. Partially Funded List
    - Near-term: TRANS-0274, 0279, 0603, 0607, 0898, 1368, 0839, 0879, 0888, 0946, 1350, 1357, 1358, 1359
    - Medium-term: TRANS-0444
    - Long-term: TRANS-0887
3. Unfunded List within 6-year
    - Near-term: TRANS-0723, 0880, 0891, 0907, 0936, 1367, 1427, 0843, 0873, 0924, 1351, 1353, 1354, 1428, 1429, 0719, 1430
    - Medium-term: TRANS-0716, 0927, 0937
    - Long-term: TRANS-0928
4. Unfunded List outside 6-year – Not scored since it is outside the six-year period.
5. Program List – Programs are citywide, therefore not scored.

TIP Changes Section



2027-2032 TIP Changes

This section provides an overview of the changes from the previous 6-year project list (2026-2031) to this year's 6-year project list (2027-2032). The changes are segmented by: projects removed; projects added; and other changes.

Projects Removed	TIP ID	Project Type	Comments
Northeast 137th Avenue - Northeast 49th Street to Northeast Fourth Plain Boulevard	TRANS-0275	Arterial Improvements	Project will be completed in 2026
Jefferson Street - West Evergreen to West Mill Plain Boulevard	TRANS-0531	Arterial Improvements	Project will be completed in 2026
Northeast 184th Avenue - Southeast 1st Street to Northeast 4th Street	TRANS-1347	Arterial Improvements	Project will be completed in 2026
E 33rd Street Complete Street and Paving Project - Interstate-5 Overpass to Saint Johns Boulevard	TRANS-0922	Active Transportation	Project will be completed in 2026
E 29th Street Complete Street and Paving Project - Interstate-5 Overpass to Saint Johns Boulevard	TRANS-0923	Active Transportation	Project will be completed in 2026
Waterfront Way Traffic Calming/ADA	TRANS-1113	Active Transportation	Project will be completed in 2026
Fort Vancouver High School Pedestrian Connection between Fourth Plain Boulevard and Northeast Campus Drive (SS4A)	TRANS-1126	Active Transportation	Removed from funded list due to right-of-way constraints
Saint Johns Boulevard Complete Street and Paving Project – State Route 500 to Northeast Minnehaha Street	TRANS-1365	Active Transportation	Project will be completed in 2026
Burton Road/ Northeast 28th Street Complete Street and Paving Project - Northeast Andresen Road to Northeast 127th Avenue	TRANS-1355	Active Transportation	Removed from partially funded list, to be completed as part of the pavement preservation program
Northeast 122nd Avenue Complete Street and Paving Project - Northeast 39th Street to Northeast 49th Street	TRANS-1356	Active Transportation	Removed from partially funded list, to be completed as part of the pavement preservation program

Van Plaza Drive Enhanced Pedestrian Crossing	TRANS-1144	Active Transportation	Project will be completed in 2026
Pavement Reconstruction Program	TRANS-0421	Program	Removed from program list, combined with the pavement preservation program
Main Street Promise	TRANS-0495	Arterial Improvements	Project will be completed in 2026
Fourth Plain Boulevard and East Reserve Street Enhanced Pedestrian Crossing (SS4A)	TRANS-1125	Active Transportation	Removed from funded list, combined with the TRANS-0899
Fourth Plain Boulevard and BBC Trail Crossing Intersection Mural	TRANS-1130	Active Transportation	Mural projects are not capital improvements

Projects Added	**TIP ID**	**Project Type**	**Comments**
Northeast 78th Street and Northeast 72nd Avenue Intersection Improvements	TRANS-1427	Signal and Lighting Improvements	New project added to the unfunded within 6-year list
West 11th Street/BNSF Crossing Grade Separation Project	TRANS-1428	Active Transportation	New project added to the unfunded within 6-year list
Northeast 112th Avenue Off Street Path – Northeast 18th Street to Northeast 51st Street	TRANS-1429	Active Transportation	New project added to the unfunded outside 6-year list
Northeast 112th Avenue/ Southeast Chkalov Drive Complete Street Project - Northeast 2nd Street to Southeast 3rd Street	TRANS-1430	Active Transportation	New project added to the unfunded within 6-year list

Other Changes	**TIP ID**	**Project Type**	**Comments**
Northeast Fourth Plain Boulevard - Enhanced Pedestrian Crossings (SS4A)	TRANS-0899	Active Transportation	Changed name to reflect project more accurately
Fourth Plain for All (ARPA)	TRANS-1364	Active Transportation	Changed name to reflect project more accurately
McGillivray Boulevard and Village Loop Drive Intersection Improvements	TRANS-0880	Signal and Lighting Improvements	Changed project type to reflect project more accurately, moved arterial to signal and lighting
Northeast 49th Street - Northeast 122nd Avenue to Northeast 137th Avenue	TRANS-0279	Arterial Improvements	Moved from unfunded outside 6-year to partially funded list

Northeast 112th Avenue/ Southeast Chkalov Drive Complete Street and Paving Project - Northeast 28th Street to Northeast 51st Street	TRANS-1350	Active Transportation	Moved from funded to partially funded list due to funding constraints
Northeast 112th Avenue/ Southeast Chkalov Drive Complete Street Project - Southeast 3rd Street to Southeast McGillivray Boulevard	TRANS-1351	Active Transportation	Moved from funded to unfunded within 6-year list due to funding constraints, changed name to reflect project more accurately
Mill Plain and Devine Intersection Improvements	TRANS-1368	Arterial Improvements	Moved from unfunded within 6-year to partially funded list, changed name to match Workday
Upper Main Street Complete Street and Paving Project - East 39th to Northeast 45th Street/Hazel Dell	TRANS-1352	Active Transportation	Changed name to reflect project more accurately
McGillivray Complete Street and Paving Project - Chkalov Drive to Southeast 164th Avenue	TRANS-0920	Active Transportation	Changed name to reflect project more accurately
Northeast 112th Avenue - East Mill Plain Boulevard to Northeast 28th Street Safety and Mobility Complete Street	TRANS-0719	Arterial Improvements	Moved from unfunded outside 6-year to unfunded within 6-year
Grand Loop Infrastructure Improvements	TRANS-0944	Arterial Improvements	Changed name to match Workday
North Devine Road - south of Mill Plain Boulevard to MacArthur Boulevard	TRANS-0893	Arterial Improvements	Changed name to reflect project more accurately
Northeast 86th/ Northeast 87th Avenues Safety and Mobility Complete Street	TRANS-1357	Active Transportation	Changed name to match Workday
Northeast 72nd Avenue Safety and Mobility Complete Street	TRANS-1358	Active Transportation	Changed name to match Workday
Northeast 97th/98th Avenues Safety and Mobility Complete Street	TRANS-1359	Active Transportation	Changed name to match Workday
Mill Plain/MacArthur Intersection Improvements	TRANS-0938	Arterial Improvements	Changed name to match Workday
Fourth Plain Boulevard and Watson Avenue Pedestrian Crossing (SS4A)	TRANS-1115	Signal and Lighting Improvements	Changed name to match Workday
Evergreen Trail - Chelsea to Image	TRANS-0740	Active Transportation	Changed name to match Workday

Northeast 18th and Devine Pedestrian Improvements	TRANS-0889	Active Transportation	Changed name to match Workday
Hazel Dell Avenue and Burnt Bridge Creek Trail Crossing Improvements	TRANS-0910	Active Transportation	Changed name to match Workday
Lincoln Elementary School Crossing Improvements (STRS)	TRANS-0914	Active Transportation	Changed name to match Workday
Garrison Road Sidewalk Infill - Mill Plain to Northeast 12th Street	TRANS-0943	Active Transportation	Changed name to match Workday
Walnut Grove Elementary School Sidewalk and Pedestrian Crossing Improvements (SRTS)	TRANS-1119	Active Transportation	Changed name to match Workday
MacArthur and Leiser Improvements	TRANS-0603	Arterial Improvements	Changed name to match Workday
Fruit Valley and Lakeshore Avenue Roundabout	TRANS-0887	Arterial Improvements	Changed name to match Workday
192nd Avenue On-Ramp to State Route 14 Signal	TRANS-0888	Signal and Lighting Improvements	Changed name to match Workday
Fourth Plain - 62nd - Andresen Multiuse Path	TRANS-0946	Active Transportation	Changed name to match Workday
Traffic Signal Sustainability2	TRANS-0237	Program	Changed name to match Workday
Neighborhood Traffic Management Program	TRANS-0240	Program	Changed name to match Workday
Multi Modal Safety and Accessibility Program	TRANS-0844	Program	Changed name to match Workday
Citywide Street Light Program	TRANS-0869	Program	Changed name to match Workday
Safe Routes to School	TRANS-1131	Program	Changed name to match Workday
Pavement Management Program	TRANS-0241	Program	Changed name to match Workday
Evergreen Highway Pathway - Southeast Image Road to Southeast 100th Court	TRANS-0843	Active Transportation	Changed name to reflect project more accurately

Non-City Projects Removed	**Agency**	**Comments**
State Route 500 Northeast Fourth Plain Boulevard to Northeast 76th Street – Complete Street (Planning Phase)	WSDOT	Completed

Six-Year Project Lists Section

Refer to Supplementary Document Section for screen readers compatible document of this section.



2027-2032 Transportation Improvement Program - FUNDED PROJECTS

Note: All costs are in 2026 dollars. 2026 shown for reference only (6-year plan is for 2027-2032).

LOCAL $ = current non-grant revenue and dedicated street funding non-grant revenue sources; GRANT $ = secured and *potential* (italicized/gray) grants; SS4A = Safe Streets and Roads For All; SRTS = Safe Routes to School; ARPA = American Rescue Plan Act

***All these projects are grouped under PRJ101190 - Fourth Plan Safe Streets for All (SS4A) Federal Highway Administation Grant Project.**

TRANS ID	Project ID	Project Name	Project Phase Status	Project Type	TIF Area (new)	Spent to Date (thru Jan 2026)	Funding Type	2026 Planned Expenditures	2027 Planned Expenditures	2028 Planned Expenditures	2029 Planned Expenditures	2030 Planned Expenditures	2031 Planned Expenditures	2032 Planned Expenditures	6-Year Total
TRANS-0527	PRJ071616	**NE 18th St - 97th Ave. to 107th Ave.**	Design Phase - Funded - Started. Right-of-Way Phase - Funded - Started. Construction Phase - Funding uncertain - Not started.	Arterial Improvements	Pacific & Cascade	$3,197,573	LOCAL $	$5,000,000	$4,500,000	$500,000					$5,000,000
							GRANT $	$2,000,000	$8,000,000						$8,000,000
							TOTAL $	$7,000,000	$12,500,000	$500,000	$0	$0	$0	$0	$13,000,000
TRANS-0938	PRJ101031	**Mill Plain/MacArthur Intersection Improvements**	Design Phase - Funded - Completed. Right-of-Way Phase - Funded - Completed. Construction Phase - Funded - Started.	Arterial Improvements	Columbia	$986,504	LOCAL $	$3,400,000	$2,500,000						$2,500,000
							GRANT $	$4,000,000							$0
							TOTAL $	$7,400,000	$2,500,000	$0	$0	$0	$0	$0	$2,500,000
TRANS-0944	PRJ101098	**Grand Loop Infrastructure Improvements**	Design Phase - Funded - Started. Right-of-Way Phase - Started. Construction Phase - Funded - Not Started.	Arterial Improvements	Columbia	$1,650,780	LOCAL $	$2,500,000	$15,000,000	$7,500,000					$22,500,000
							GRANT $								$0
							TOTAL $	$2,500,000	$15,000,000	$7,500,000	$0	$0	$0	$0	$22,500,000
TRANS-1115	PRJ101246	**Image Elementary School Pedestrian Crossing Improvements (SRTS)**	Design Phase - Funded - Not Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Started.	Signal and Lighting Improvements	Pacific	$1,508	LOCAL $								$0
							GRANT $	$50,000	$200,000	$50,000					$250,000
							TOTAL $	$50,000	$200,000	$50,000	$0	$0	$0	$0	$250,000
TRANS-1117	PRJ101190*	**Fourth Plain Blvd. and Laurel Pl. Pedestrian Crossing (SS4A)**	Design Phase - Funded - Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started.	Signal and Lighting Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$200,000	$200,000						$200,000
							TOTAL $	$200,000	$200,000	$0	$0	$0	$0	$0	$200,000
TRANS-1118	PRJ101190*	**Fourth Plain Blvd. and Watson Ave. Pedestrian Crossing (SS4A)**	Design Phase - Funded - Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started.	Signal and Lighting Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$200,000	$200,000						$200,000
							TOTAL $	$200,000	$200,000	$0	$0	$0	$0	$0	$200,000
TRANS-0740	PRJ071455	**Evergreen Trail - Chelsea to Image**	Design Phase - Funded - Completed. Right-of-Way Phase - Funded - Completed. Construction Phase - Funded - Not Started.	Active Transportation Improvements	Cascade	$1,509,276	LOCAL $	$250,000	$100,000						$100,000
							GRANT $	$2,500,000							$0
							TOTAL $	$2,750,000	$100,000	$0	$0	$0	$0	$0	$100,000
TRANS-0889	PRJ100592	**NE 18th and Devine Pedestrian Improvements (SS4A)**	Design Phase - Funded - Started. Right-of-Way Phase - Funded - Started. Construction Phase - Funded - Not started.	Active Transportation Improvements	Columbia	$138,658	LOCAL $	$300,000	$300,000						$300,000
							GRANT $								$0
							TOTAL $	$300,000	$300,000	$0	$0	$0	$0	$0	$300,000
TRANS-0899	PRJ100672	**NE Fourth Plain Blvd - Enhanced Pedestrian Crossings (SS4A)**	Design Phase - Funded - Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started.	Active Transportation Improvements	Columbia	$50,776	LOCAL $	$500,000							$0
							GRANT $	$350,000	$350,000						$350,000
							TOTAL $	$850,000	$350,000	$0	$0	$0	$0	$0	$350,000
TRANS-0910	PRJ100914	**Hazel Dell Avenue and Burnt Bridge Creek Trail Crossing Improvements**	Design Phase - Funded - Started. Right-of-Way Phase - Funded - Started. Construction Phase - Funded - Not started.	Active Transportation Improvements	Columbia	$243,227	LOCAL $		$175,000						$175,000
							GRANT $	$700,000							$0
							TOTAL $	$700,000	$175,000	$0	$0	$0	$0	$0	$175,000
TRANS-0914	PRJ101245	**Lincoln Elementary School Crossing Improvements (SRTS)**	Design Phase - Funded - Not Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started.	Active Transportation Improvements	Columbia	$1,508	LOCAL $								$0
							GRANT $	$250,000	$50,000						$50,000
							TOTAL $	$250,000	$50,000	$0	$0	$0	$0	$0	$50,000
TRANS-0920	PRJ100802	**McGillivray Complete Street and Paving Project - Chkalov Dr. to SE 164th Ave**	Design Phase - Funded - Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started.	Active Transportation Improvements	Cascade	$718,721	LOCAL $	$3,750,000	$3,750,000						$3,750,000
							GRANT $								$0
							TOTAL $	$3,750,000	$3,750,000	$0	$0	$0	$0	$0	$3,750,000
TRANS-0921	PRJ100923	**NE 112th Ave. Complete Street and Paving Project - Mill Plain Blvd. to NE 28th St.**	Design Phase - Funded - Started. Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started.	Active Transportation Improvements	Cascade & Pacific	$246,992	LOCAL $	$250,000	$500,000						$500,000
							GRANT $		$2,800,000	$500,000	*$500,000*				$3,800,000
							TOTAL $	$250,000	$3,300,000	$500,000	$500,000	$0	$0	$0	$4,300,000
TRANS-0943	PRJ100922	**Garrison Road Sidewalk Infill - Mill Plain to NE 12th St**	Design Phase - Funded - Started. Right-of-Way Phase - Funded - Started. Construction Phase - Funded - Not started.	Active Transportation Improvements	Cascade	$390,846	LOCAL $								$0
							GRANT $	$500,000	$500,000						$500,000
							TOTAL $	$500,000	$500,000	$0	$0	$0	$0	$0	$500,000
TRANS-1119	PRJ101244	**Walnut Grove Elementary School Sidewalk and Pedestrian Crossing Improvements (SRTS)**	Design Phase - Funded - Started Right-of-Way Phase - Not Started Construction Phase - Funded - Not started	Active Transportation Improvements	Columbia	$17,106	LOCAL $								$0
							GRANT $	$500,000	$1,500,000						$1,500,000
							TOTAL $	$500,000	$1,500,000	$0	$0	$0	$0	$0	$1,500,000
TRANS-1120	PRJ101190*	**Z St. Sidewalk Infill - Fourth Plain Blvd. to NE 26th St. (SS4A)**	Design Phase - Funded - Started Right-of-Way Phase - N/A Construction Phase - Funded - Not started	Active Transportation Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$173,750	$173,750						$173,750
							TOTAL $	$173,750	$173,750	$0	$0	$0	$0	$0	$173,750
TRANS-1121	PRJ101190*	**Neals Ln. Sidewalk Extension - E 24th St. to E 28th St. (SS4A)**	Design Phase - Funded - Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started	Active Transportation Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$267,500	$267,500						$267,500
							TOTAL $	$267,500	$267,500	$0	$0	$0	$0	$0	$267,500
TRANS-1122	PRJ101190*	**Rossiter Ln. to BBC Pedestrian Connector (SS4A)**	Design Phase - Funded - Not Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started	Active Transportation Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$250,000	$250,000	$500,000					$750,000
							TOTAL $	$250,000	$250,000	$500,000	$0	$0	$0	$0	$750,000
TRANS-1123	PRJ101190*	**Todd Rd. Sidewalk Infill - Fourth Plain Blvd. to 18th St. (SS4A)**	Design Phase - Funded - Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not Started	Active Transportation Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$267,500	$267,500						$267,500
							TOTAL $	$267,500	$267,500	$0	$0	$0	$0	$0	$267,500
TRANS-1124	PRJ101190*	**Stapleton Rd. Mobility Improvements - SR 500 to 18th St. (SS4A)**	Design Phase - Funded - Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not started	Active Transportation Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$400,000	$400,000						$400,000
							TOTAL $	$400,000	$400,000	$0	$0	$0	$0	$0	$400,000

2027-2032 Transportation Improvement Program - FUNDED PROJECTS

Note: All costs are in 2026 dollars. 2026 shown for reference only (6-year plan is for 2027-2032).

LOCAL $ = current non-grant revenue and dedicated street funding non-grant revenue sources; GRANT $ = secured and *potential* (italicized/gray) grants; SS4A = Safe Streets and Roads For All; SRTS = Safe Routes to School; ARPA = American Rescue Plan Act

***All these projects are grouped under PRJ101190 - Fourth Plan Safe Streets for All (SS4A) Federal Highway Administation Grant Project.**

TRANS ID	Project ID	Project Name	Project Phase Status	Project Type	TIF Area (new)	Spent to Date (thru Jan 2026)	Funding Type	2026 Planned Expenditures	2027 Planned Expenditures	2028 Planned Expenditures	2029 Planned Expenditures	2030 Planned Expenditures	2031 Planned Expenditures	2032 Planned Expenditures	6-Year Total
TRANS-1127	PRJ101190*	**34th St Sidewalk Connection (SS4A)**	Design Phase - Funded - Not Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not Started	Active Transportation Improvements	Columbia	N/A	LOCAL $								$0
							GRANT $	$35,000	$150,000	$150,000					$300,000
							TOTAL $	$35,000	$150,000	$150,000	$0	$0	$0	$0	$300,000
TRANS-1352	PRJ101097	**Upper Main St. Complete Street and Paving Project - E 39th to NE 45th St./Hazel Dell**	Design Phase - Funded - Started Right-of-Way Phase - Unfunded - Not Started Construction Phase - Unfunded - Not Started	Active Transportation Improvements	Columbia	$466,547	LOCAL $	$412,500	$412,500						$412,500
							GRANT $	$1,250,000	$1,250,000						$1,250,000
							TOTAL $	$1,662,500	$1,662,500	$0	$0	$0	$0	$0	$1,662,500
TRANS-1364	PRJ101186 PRJ101188 PRJ101189	**Fourth Plain for All (ARPA)**	Design Phase - Funded - Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not Started	Active Transportation Improvements	Columbia & Pacific	$331,357	LOCAL $								$0
							GRANT $	$1,200,000	$1,200,000	$1,600,000					$2,800,000
							TOTAL $	$1,200,000	$1,200,000	$1,600,000	$0	$0	$0	$0	$2,800,000
															6-year Grand Totals
							LOCAL $	$16,362,500	$27,237,500	$8,000,000	$0	$0	$0	$0	$35,237,500
							GRANT $	$15,093,750	$17,758,750	$2,800,000	$500,000	$0	$0	$0	$21,058,750
							TOTAL $	$31,456,250	$44,996,250	$10,800,000	$500,000	$0	$0	$0	$56,296,250

2027-2032 Transportation Improvement Program - PARTIALLY FUNDED PROJECTS

Note: All costs are in 2026 dollars. 2026 shown for reference only (6-year plan is for 2027-2032).

LOCAL $ = current non-grant revenue and dedicated street funding non-grant revenue sources; GRANT $ = secured and *potential* (italicized/gray) grants; SS4A = Safe Streets and Roads For All; SRTS = Safe Routes to School; ARPA = American Rescue Plan Act

Priority Score	TRANS ID	Project ID	Project Name	Project Phase Status	Project Type	TIF Area (new)	Spent to Date (thru Jan 2026)	Funding Type	2026 Planned Expenditures	2027 Planned Expenditures	2028 Planned Expenditures	2029 Planned Expenditures	2030 Planned Expenditures	2031 Planned Expenditures	2032 Planned Expenditures	6-Year Total
Near-term	TRANS-0274	TBD	**NE 28th St. - NE 142nd Ave. to NE 162nd Ave.**	Design Phase - Funded - Not Started. Right-of-Way Phase - Unfunded - Not Started. Construction Phase - Unfunded - Not Started.	Arterial Improvements	Pacific	$0	LOCAL $				$1,000,000		$4,000,000	$1,000,000	$6,000,000
								GRANT $		$750,000		*$1,000,000*		*$4,000,000*		$5,750,000
								TOTAL $	$0	$750,000	$0	$2,000,000	$0	$8,000,000	$1,000,000	$11,750,000
Near-term	TRANS-0279	TBD	**NE 49th St. - NE 122nd Ave. to NE 137th Ave.**	Design Phase - Funded - Not Started. Right-of-Way Phase - Unfunded - Not Started. Construction Phase - Unfunded - Not Started.	Arterial Improvements	Pacific	$0	LOCAL $			$627,500	$627,500			$1,000,000	$2,255,000
								GRANT $				*$562,500*			*$1,000,000*	$1,562,500
								TOTAL $	$0	$0	$627,500	$1,190,000	$0	$0	$2,000,000	$3,817,500
Medium-term	TRANS-0444	PRJ100788	**NE 18th St - 141st Ave to 162nd Ave**	Design Phase - Funded - Started. Right-of-Way Phase - Funding uncertain - Not Started. Construction Phase - Unfunded - Not started.	Arterial Improvements	Pacific & Cascade	$233,085	LOCAL $	$2,000,000	$500,000	$3,000,000	$2,000,000				$5,500,000
								GRANT $		$4,500,000	$3,000,000					$7,500,000
								TOTAL $	$2,000,000	$5,000,000	$6,000,000	$2,000,000	$0	$0	$0	$13,000,000
Near-term	TRANS-0603	PRJ101230	**MacArthur and Leiser Improvements**	Design Phase - Partially Funded - Started. Right-of-Way Phase - Unfunded. Construction Phase - Unfunded.	Arterial Improvements	Cascade	$447,913	LOCAL $		$250,000						$250,000
								GRANT $								$0
								TOTAL $	$0	$250,000	$0	$0	$0	$0	$0	$250,000
Near-term	TRANS-0607	PRJ100868	**NE 192nd Avenue - NE 18th Street to SE 1st Street**	Design Phase - Funded - Started. Right-of-Way Phase - Funded - Not Started. Construction Phase - Unfunded - Not Started.	Arterial Improvements	Cascade	$907,415	LOCAL $	$800,000		$2,000,000	$3,000,000	$3,000,000			$8,000,000
								GRANT $	$250,000	$1,000,000		*$3,000,000*	*$3,000,000*			$7,000,000
								TOTAL $	$1,050,000	$1,000,000	$2,000,000	$6,000,000	$6,000,000	$0	$0	$15,000,000
Long-term	TRANS-0887	PRJ100787	**Fruit Valley and Lakeshore Avenue Roundabout**	Design Phase - Partially Funded - Not Started. Right-of-Way Phase - Funded - Not Started. Construction Phase - Unfunded - Not Started.	Arterial Improvements	Columbia	$0	LOCAL $		$300,000						$300,000
								GRANT $								$0
								TOTAL $	$0	$300,000	$0	$0	$0	$0	$0	$300,000
Near-term	TRANS-0898	PRJ100386	**NE 115th Avenue Extension - 16th St to 18th St**	Design Phase - Funded by developer - Started. Right-of-Way Phase - Funded - Started. Construction Phase - Unfunded - Not Started.	Arterial Improvements	Cascade	$127,400 Developer	LOCAL $	$50,000	$50,000						$50,000
								GRANT $								$0
								TOTAL $	$50,000	$50,000	$0	$0	$0	$0	$0	$50,000
Near-term	TRANS-1368	PRJ101231	**Mill Plain and Devine Intersection Improvements**	Design Phase - Funded - Started. Right-of-Way Phase - Funded - Not Started. Construction Phase - Unfunded - Not Started.	Arterial Improvements	Columbia	$399,298	LOCAL $		$250,000						$250,000
								GRANT $								$0
								TOTAL $	$0	$250,000	$0	$0	$0	$0	$0	$250,000
Near-term	TRANS-0839	PRJ100351	**Fourth Plain and 152nd Ave Signal**	Design Phase - Funded - Complete. Right-of-Way Phase - Unfunded. Construction Phase - Unfunded.	Signal and Lighting Improvements	Pacific	$74,929 Developer	LOCAL $				$150,000				$150,000
								GRANT $								$0
								TOTAL $	$0	$0	$0	$150,000	$0	$0	$0	$150,000
Near-term	TRANS-0879	PRJ100352	**Columbia House Blvd and Grove St Signal Upgrade**	Design Phase - Partially Funded - Started. Right-of-Way Phase - Unfunded. Construction Phase - Unfunded.	Signal and Lighting Improvements	Columbia	$90,238 Developer	LOCAL $		$20,000						$20,000
								GRANT $								$0
								TOTAL $	$0	$20,000	$0	$0	$0	$0	$0	$20,000
Near-term	TRANS-0888	PRJ100443	**192nd Avenue On-Ramp to SR-14 Signal**	Design Phase - Partially Funded - Not Started. Right-of-Way Phase - Unfunded. Construction Phase - Unfunded.	Signal and Lighting Improvements	Cascade	$77,783 Developer	LOCAL $	$315,800	$473,600						$473,600
								GRANT $								$0
								TOTAL $	$315,800	$473,600	$0	$0	$0	$0	$0	$473,600
Near-term	TRANS-0946	PRJ100959	**Fourth Plain - 62nd - Andresen Multiuse Path**	Design Phase - Funded - Not Started. Right-of-Way Phase - Funded - Not Started. Construction Phase - Unfunded - Not Started.	Active Transportation Improvements	Columbia	$61,243	LOCAL $	$875,000	$875,000						$875,000
								GRANT $								$0
								TOTAL $	$875,000	$875,000	$0	$0	$0	$0	$0	$875,000
Near-term	TRANS-1350	TBD	**112th Ave./Chkalov Dr. Complete Street and Paving Project - NE 28th St. to NE 51st St.**	Design Phase - Funded - Started Right-of-Way Phase - Not Applicable. Construction Phase - Funded - Not Started	Active Transportation Improvements	Pacific	$0	LOCAL $		$100,000	$3,825,000	$50,000				$3,975,000
								GRANT $								$0
								TOTAL $	$0	$100,000	$3,825,000	$50,000	$0	$0	$0	$3,975,000
Near-term	TRANS-1357	PRJ101087	**NE 86th/NE 87th Avenues Safety and Mobility Complete Street**	Design Phase - Funded - Not Started. Right-of-Way Phase - Unfunded - Not Started. Construction Phase - Unfunded - Not Started.	Active Transportation Improvements	Pacific & Cascade	$107,274	LOCAL $	$100,000	$1,800,000	$175,000					$1,975,000
								GRANT $								$0
								TOTAL $	$100,000	$1,800,000	$175,000	$0	$0	$0	$0	$1,975,000
Near-term	TRANS-1358	PRJ101088	**NE 72nd Avenue Safety and Mobility Complete Street**	Design Phase - Funded - Not Started. Right-of-Way Phase - Unfunded - Not Started. Construction Phase - Unfunded - Not Started.	Active Transportation Improvements	Pacific	$104,852	LOCAL $	$100,000	$1,150,000	$175,000					$1,325,000
								GRANT $								$0
								TOTAL $	$100,000	$1,150,000	$175,000	$0	$0	$0	$0	$1,325,000
Near-term	TRANS-1359	PRJ101089	**NE 97th/98th Avenues Safety and Mobility Complete Street**	Design Phase - Funded - Not Started. Right-of-Way Phase - Unfunded - Not Started. Construction Phase - Unfunded - Not started.	Active Transportation Improvements	Pacific & Cascade	$98,578	LOCAL $	$100,000	$1,450,000	$150,000					$1,600,000
								GRANT $								$0
								TOTAL $	$100,000	$1,450,000	$150,000	$0	$0	$0	$0	$1,600,000
																6-year Grand Totals
								LOCAL $	$4,340,800	$7,218,600	$9,952,500	$6,827,500	$3,000,000	$4,000,000	$2,000,000	$32,998,600
								GRANT $	$250,000	$6,250,000	$3,000,000	$4,562,500	$3,000,000	$4,000,000	$1,000,000	$21,812,500
								TOTAL $	$4,590,800	$13,468,600	$12,952,500	$11,390,000	$6,000,000	$8,000,000	$3,000,000	$54,811,100

2027-2032 Transportation Improvement Program
UNFUNDED PROJECTS WITHIN 6-YEAR

Priority Score	TRANS ID	Project Name	Project Type	Scoping Level Estimate	TIF Area (new)
Medium-term	TRANS-0716	NE 9th St. - NE 172nd Ave. to NE 192nd Ave.	Arterial Improvements	$12 million	Cascade
Near-term	TRANS-0719	NE 112th Ave. - E. Mill Plain Blvd. to NE 28th St. Safety and Mobility Complete Street	Arterial Improvements	$3 million	Columbia & Cascade
Near-term	TRANS-0723	SE 20th St. and SE 176th Ave. Roundabout	Arterial Improvements	$1 million	Cascade
Near-term	TRANS-0891	E. Mill Plain - Boise Ave. to N. Andresen Rd.	Arterial Improvements	$10 million	Columbia
Near-term	TRANS -0907	NE 124th Ave. - NE 28th St. to NE 39th St.	Arterial Improvements	$10 million	Pacific
Medium-term	TRANS -0927	NE 187th Ave - SE 1st St to NE 18th St.	Arterial Improvements	$13 million	Cascade
Long-term	TRANS-0928	NE 13th St - NE 172nd Ave to NE 187th Ave.	Arterial Improvements	$18 million	Cascade
Near-term	TRANS-0880	McGillivray Blvd. and Village Loop Drive Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Cascade
Near-term	TRANS-0936	Mill Plain Blvd. and Hearthwood Blvd. Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Cascade
Medium-term	TRANS-0937	SE Westridge Blvd. and SE 1st Street Intersection Improvements	Signal and Lighting Improvements	$1.5 million	Cascade
Near-term	TRANS-1367	9th Street Illumination Project	Signal and Lighting Improvements	$0.2 million	Cascade
Near-term	TRANS-1427	NE 78th St. and NE 72nd Ave Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Pacific

2027-2032 Transportation Improvement Program
UNFUNDED PROJECTS OUTSIDE 6-YEAR

TRANS ID	Project Name	Project Type	Scoping Level Estimate	TIF Area (new)
TRANS-0281	NE 18th St. - NE 87th Ave. to NE 97th Ave.	Arterial Improvements	$16 million	Columbia & Cascade
TRANS-0349	NE 18th St. - NE 164th Ave. to NE 192nd Ave.	Arterial Improvements	$20 million	Columbia & Cascade
TRANS-0680	Columbia Shores Blvd. at Columbia Way - BNSF Undercrossing Widening	Arterial Improvements	$30 million	Columbia
TRANS-0712	NE 59th St. - NE 147th Ave. to NE 162nd Ave.	Arterial Improvements	$9 million	Pacific
TRANS-0717	NE 184th Ave. - NE 4th St. to NE 18th St. *(developer build)*	Arterial Improvements	$14 million	Cascade
TRANS-0718	NE 162nd Ave. - SE 1st St. to NE 9th St.	Arterial Improvements	$13 million	Cascade
TRANS-0825	NE 54th Street - NE 15th Ave. to NE Saint James Rd.	Arterial Improvements	$14 million	Columbia
TRANS-0826	NE 104th Avenue - SE Mill Plain Blvd. to NE 14th Street	Arterial Improvements	$12 million	Cascade
TRANS-0827	NE 104th Avenue - NE 14th Street to NE 18th Street	Arterial Improvements	$12 million	Cascade
TRANS-0836	E Evergreen Blvd. Bridge Over S Blandford Dr.	Arterial Improvements	$15 million	Columbia
TRANS-0883	NW 32nd Ave./Lower River Rd. Roundabout	Arterial Improvements	$2 million	Columbia
TRANS-0884	NW 32nd Ave. Freight and Mobility - Lower River Rd. to NW 61st St.	Arterial Improvements	$64 million	Columbia
TRANS-0885	NW 32nd Ave. Freight and Mobility - NW 61st St. to Burnt Bridge Creek	Arterial Improvements	$49 million	Columbia
TRANS-0886	NW 32nd Ave. Freight and Mobility - Burnt Bridge Creek to NW 78th St.	Arterial Improvements	$10 million	Columbia
TRANS-0892	MacArthur Boulevard - Blandford Dr. to Lieser Rd.	Arterial Improvements	$15 million	Columbia & Cascade
TRANS-0893	N. Devine Rd. - South of Mill Plain Blvd. to MacArthur Blvd.	Arterial Improvements	$4 million	Columbia
TRANS-0894	N Andresen Rd. - E. Mill Plain Blvd. to Highland Dr.	Arterial Improvements	$10 million	Columbia & Cascade
TRANS-0895	MacArthur Blvd. at N. Devine Rd. Roundabout	Arterial Improvements	$2 million	Columbia
TRANS-0896	MacArthur Blvd. at N. Andresen Rd. Roundabout	Arterial Improvements	$2 million	Columbia & Cascade
TRANS-0909	SE 29th St. - SE 176th Ave. to SE 192nd Ave. *(developer build)*	Arterial Improvements	$10 million	Cascade
TRANS-0722	St Johns Blvd. and NE 68th St.	Signal and Lighting Improvements	$1 million	Columbia
TRANS-0746	SE McGillivray Blvd. and SE 166th Ave.	Signal and Lighting Improvements	$0.5 million	Cascade
TRANS-0818	NE Burton/28th Street - NE Andresen Rd. to NE 138th Ave.	Signal and Lighting Improvements	$2 million	Pacific
TRANS-0819	NW Fruit Valley Rd. at La Frambois Rd.	Signal and Lighting Improvements	$1 million	Columbia
TRANS-0848	SE 164th Avenue and SE 12th Street Intersection Improvements	Signal and Lighting Improvements	$1 million	Cascade
TRANS-0856	NE 18th Street and NE 172nd Avenue Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Cascade
TRANS-0868	St. Johns Blvd. and Fort Vancouver Way Intersection Improvements	Signal and Lighting Improvements	$2 million	Columbia
TRANS-0931	NE 162nd Avenue and NE 9th Street Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Cascade
TRANS-0932	NE 172nd Avenue and NE 9th Street Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Cascade
TRANS-0942	SE 192nd Avenue and Mill Plain Blvd. Intersection Improvements	Signal and Lighting Improvements	$0.5 million	Cascade
TRANS-0741	Evergreen Hwy. Pathway - Columbia Springs to SE 164th Ave.	Active Transportation	$7 million	Cascade
TRANS-0742	Evergreen Hwy. Pathway - SE 164th Ave. to east City Limits	Active Transportation	$7 million	Cascade
TRANS-0857	SE 10th Street Sidewalks - SE 98th Avenue to SE Ellsworth Road	Active Transportation	$2 million	Cascade

2027-2032 Transportation Improvement Program
UNFUNDED PROJECTS OUTSIDE 6-YEAR

TRANS ID	Project Name	Project Type	Scoping Level Estimate	TIF Area (new)
TRANS-0861	Westside Bike Mobility	Active Transportation	$5 million	Columbia
TRANS-0890	NE Fourth Plain Blvd. and Grand Blvd. - Pedestrian Improvement SW Corner	Active Transportation	$0.7 million	Columbia
TRANS-0903	NE 9th St. Infill Sidewalk - NE 112th Ave. to NE 136th Ave.	Active Transportation	$0.5 million	Cascade
TRANS-0905	Amtrak Multimodal Access	Active Transportation	$10 million	Columbia
TRANS-0911	NE Padden Expressway and NE Andresen Rd. Intersection Improvements	Active Transportation	$10 million	Pacific
TRANS-0913	MacArthur Blvd. and S. Blandford Dr. Pedestrian Crossing	Active Transportation	$1 million	Columbia
TRANS-0915	Fruit Valley Rd. and Firestone Lane Pedestrian Crossing	Active Transportation	$1 million	Columbia
TRANS-0916	W. 16th St. and NW Packing Co. Pedestrian Crossing	Active Transportation	$1 million	Columbia
TRANS-0926	SE 164th Avenue - Tech Center Drive to SE 1st Street Safety and Mobility Improvements	Active Transportation	$2 million	Cascade
TRANS-0941	Fourth Plain Blvd. Safety and Mobility - 121st Ave to 127th Ave	Active Transportation	$1 million	Pacific
TRANS-0945	E 18th Street Mobility Lane Improvements and Traffic Calming - Grand Blvd. to NE Burton Rd.	Active Transportation	$2 million	Columbia & Cascade
TRANS-1128	Brandt Rd. Traffic Calming - Fourth Plain Blvd. to E 18th St.	Active Transportation	$0.1 million	Columbia
TRANS-1129	N Grand Blvd. Traffic Calming - Fourth Plain Blvd. to E 18th St.	Active Transportation	$0.1 million	Columbia
TRANS-1143	NE Andresen Rd. Sidewalk - NE 78th St. to NE 84th St.	Active Transportation	$1 million	Pacific
TRANS-1429	NE 112th Ave Off Street Path – NE 18th St. to NE 51st St.	Active Transportation	$8.5 million	Pacific

2027-2032 Transportation Improvement Program - ANNUAL PROGRAMS

Note: All costs are in 2026 dollars. 2026 shown for reference only (6-year plan is for 2027-2032).

LOCAL $ = current non-grant revenue and dedicated street funding non-grant revenue sources; GRANT $ = secured and *potential* (italicized/gray) grants; SS4A = Safe Streets and Roads For All; SRTS = Safe Routes to School; ARPA = American Rescue Plan Act

TRANS ID	Project ID	Program Name	Project Type	Funding Type	2026 Planned Expenditures	2027 Planned Expenditures	2028 Planned Expenditures	2029 Planned Expenditures	2030 Planned Expenditures	2031 Planned Expenditures	2032 Planned Expenditures	6-Year Total
TRANS-0237	PRJ072330	**Traffic Signal Sustainability2**	Program	LOCAL $	$415,000	$415,000	$415,000	$415,000	$415,000	$415,000	$415,000	$2,490,000
				GRANT $								$0
				TOTAL $	$415,000	$415,000	$415,000	$415,000	$415,000	$415,000	$415,000	$2,490,000
TRANS-0240	PRG0102	**Neighborhood Traffic Management Program**	Program	LOCAL $	$300,000	$300,000	$300,000	$300,000	$300,000	$300,000	$300,000	$1,800,000
				GRANT $								$0
				TOTAL $	$300,000	$300,000	$300,000	$300,000	$300,000	$300,000	$300,000	$1,800,000
TRANS-0241	Varies	**Pavement Management Program**	Program	LOCAL $	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies
				GRANT $								$0
				TOTAL $	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies
TRANS-0245	PRG0256	**Bridge Inspection Program**	Program	LOCAL $	$50,000	$50,000	$50,000	$50,000	$50,000	$50,000	$50,000	$300,000
				GRANT $								$0
				TOTAL $	$50,000	$50,000	$50,000	$50,000	$50,000	$50,000	$50,000	$300,000
TRANS-0844	PRJ072459	**Multi Modal Safety and Accessibility Program**	Program	LOCAL $	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$9,000,000
				GRANT $								$0
				TOTAL $	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$1,500,000	$9,000,000
TRANS-0859	PRG0138	**Sidewalk Management Program**	Program	LOCAL $	$500,000	$500,000	$500,000	$500,000	$500,000	$500,000	$500,000	$3,000,000
				GRANT $								$0
				TOTAL $	$500,000	$500,000	$500,000	$500,000	$500,000	$500,000	$500,000	$3,000,000
TRANS-0869	PRJ100786	**Citywide Street Light Program**	Program	LOCAL $	$250,000	$250,000	$250,000	$250,000	$250,000	$250,000	$250,000	$1,500,000
				GRANT $								$0
				TOTAL $	$250,000	$250,000	$250,000	$250,000	$250,000	$250,000	$250,000	$1,500,000
TRANS-1131	PRG0287	**Safe Routes to School**	Program	LOCAL $	$200,000	$200,000	$200,000	$200,000	$200,000	$200,000	$200,000	$1,200,000
				GRANT $								$0
				TOTAL $	$200,000	$200,000	$200,000	$200,000	$200,000	$200,000	$200,000	$1,200,000
TRANS-1132	TBD	**City Safety Program**	Program	LOCAL $	$0	$0	$0	$0	$0	$0	$0	$0
				GRANT $								$0
				TOTAL $	$0	$0	$0	$0	$0	$0	$0	$0
TRANS-1133	TBD	**Lighting for Pedestrian Safety Program**	Program	LOCAL $	$0	$0	$0	$0	$0	$0	$0	$0
				GRANT $								$0
				TOTAL $	$0	$0	$0	$0	$0	$0	$0	$0
TRANS-1134	TBD	**Automated Enforcement Program**	Program	LOCAL $	$0	$0	$0	$0	$0	$0	$0	$0
				GRANT $								$0
				TOTAL $	$0	$0	$0	$0	$0	$0	$0	$0
TRANS-1135	TBD	**Ped/Bike/Small Mobility Wayfinding Program**	Program	LOCAL $	$0	$0	$0	$0	$0	$0	$0	$0
				GRANT $								$0
				TOTAL $	$0	$0	$0	$0	$0	$0	$0	$0
TRANS-1361	PRJ101287	**Curb Ramps Retrofits**	Program	LOCAL $	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$15,000,000
				GRANT $								$0
				TOTAL $	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$2,500,000	$15,000,000
												6-year Grand Totals
				LOCAL $	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$34,290,000
				GRANT $	$0	$0	$0	$0	$0	$0	$0	$0
				TOTAL $	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$5,715,000	$34,290,000

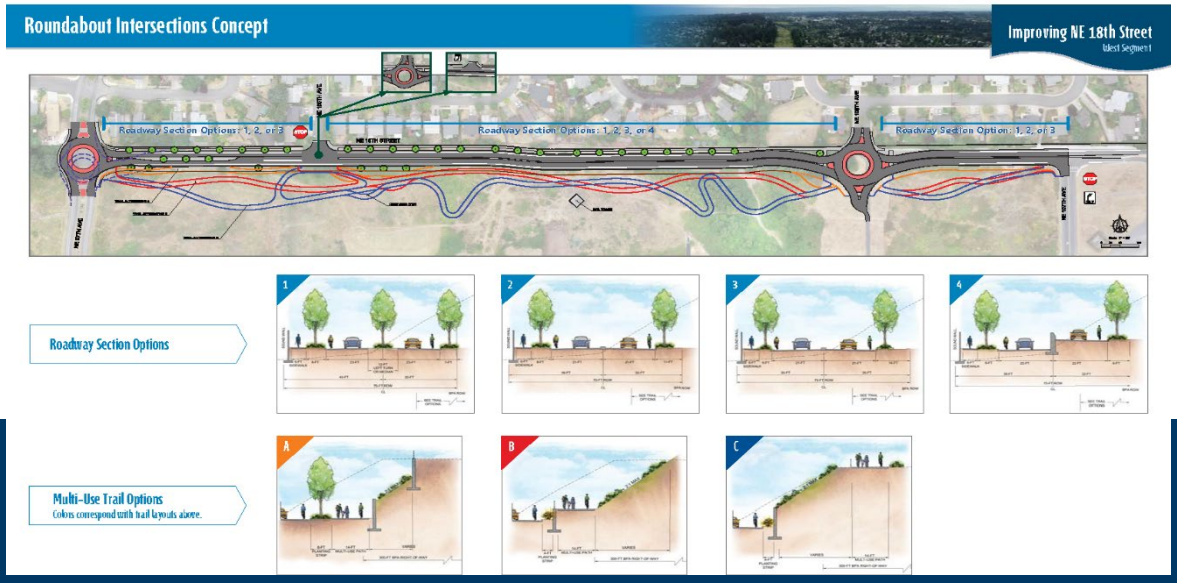
2027-2032 Transportation Improvement Program
Non-City Projects

Project Name	Non-City
I-5 Interstate Bridge Replacement (partially funded)	Multi-agency
NE 39th St and I-5 NB Ramp Widening (funded)	WSDOT
Mill Plain Fiber Network - Downtown to SE 192nd Ave.	C-Tran
Highway 99 BRT (funded)	C-Tran
Lower River Road Trail Improvement (partially funded)	Port of Vancouver
Fourth Plain Extension BRT	C-Tran

Project Details Section

Please submit questions or comments about the Project Details Section on the TIP Comment Form.

Refer to Supplementary Document Section for screen readers compatible document of this section.



2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Traffic Signal Sustainability2

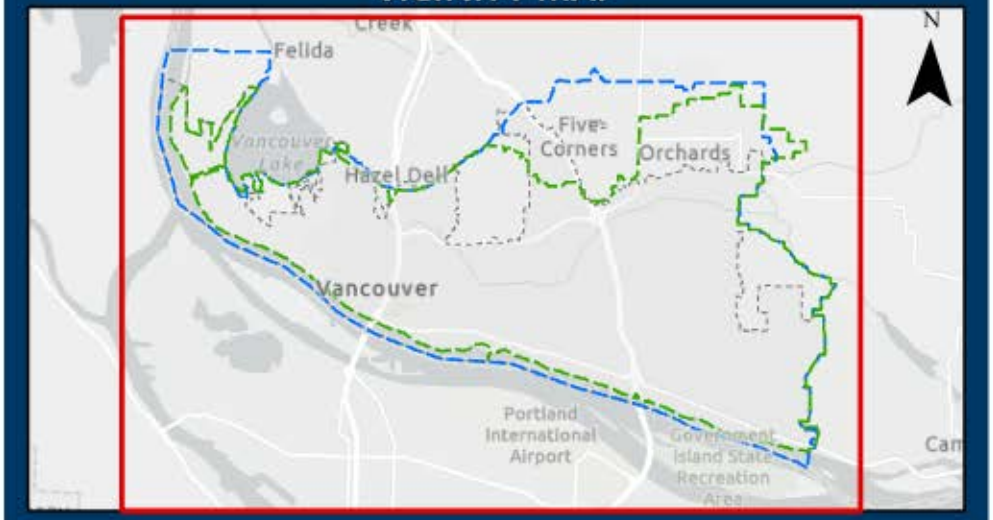
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Ongoing program to update traffic signals at locations throughout the City. Updates may include but are not limited to adding left-turn phasing, signal heads, pedestrian push-button and detectors, as well as removing a type of operation, changing detector setup or making other improvements. Dedicated Street Funding contribute $200,000 per year, with annual program budget totaling $415,000 per year.

Justification:
Traffic signals need to be upgraded or replaced as they reach the end of their useful lives. This program reflects the implementation of that philosophy.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: PRJ072330

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

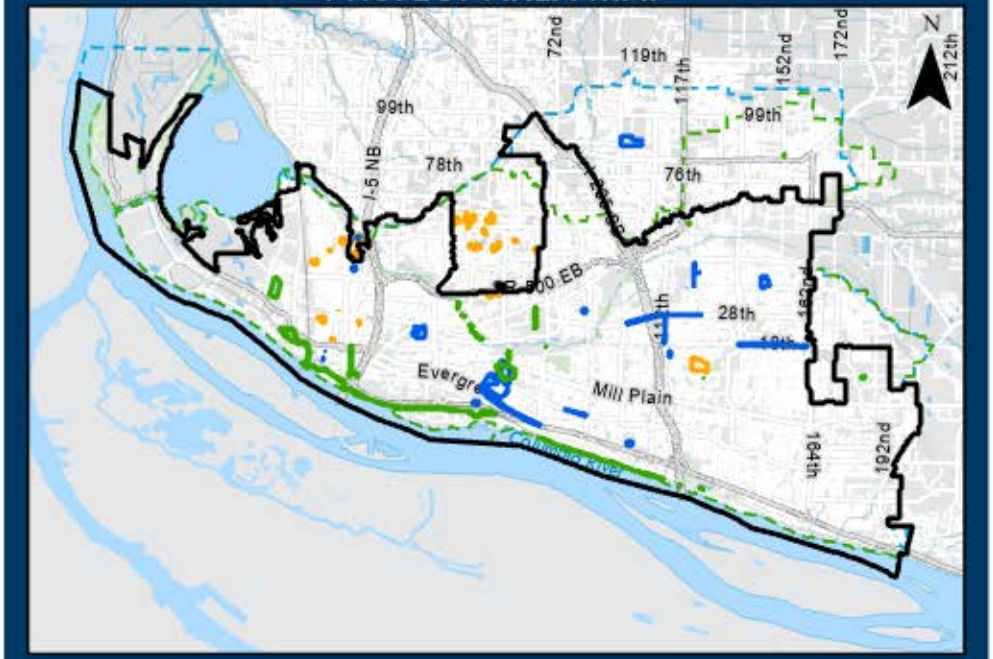
2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Neighborhood Traffic Management Program

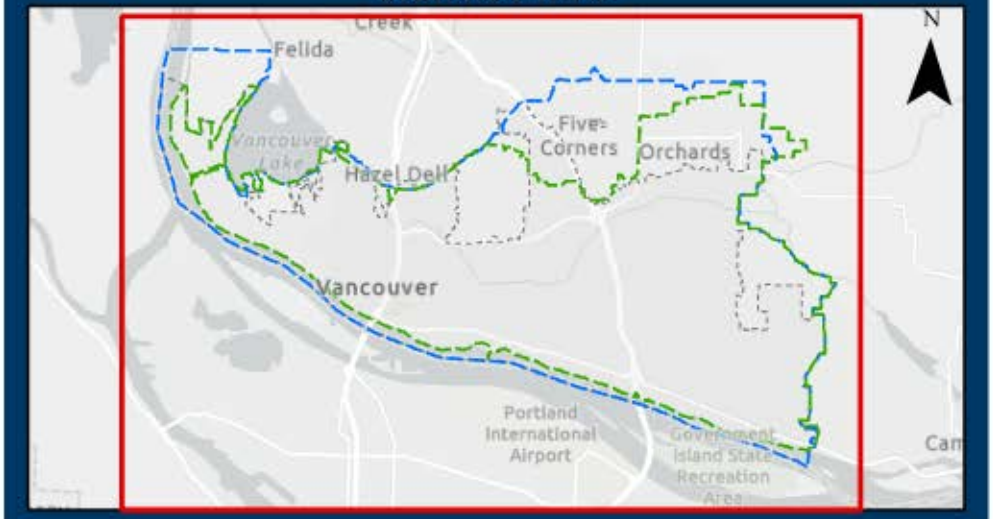
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Projects implemented as part of the ongoing Neighborhood Traffic Management (Calming) Program are intended to help slow traffic and enhance neighborhood livability. These projects may include education or infrastructure to reduce driver speeds; new or improved facilities for people walking, biking, and using mobility devices; and other strategies to increase safety and mobility in Vancouver neighborhoods. Dedicated Street Funding contribute $130,000 per year, with annual program budget totalling $300,000 per year.

Justification:
The Neighborhood Traffic Management (Calming) Program is important to reaching our Community Vision of "...Safe neighborhoods with a distinct quality and proud identities linked by parks and greenspace as well as a transportation system that provides mobility option".

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number:	PRG0102
Grant Funded:	No
Grant Amount:	$
Total Project Cost:	$
Start of Const. (year):	Ongoing

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Pavement Management Program

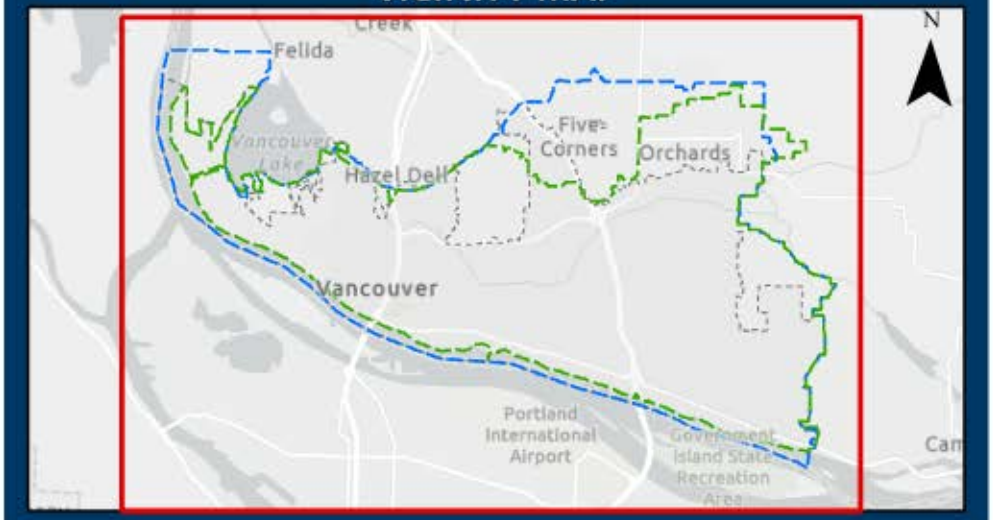
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
This ongoing program improves and maintains pavement surfaces through surface overlay, micro surfacing and slurry treatments citywide. Upgrades may include new ADA ramps, traffic striping and markings. Annual budget of approximately $12M in existing money plus approximately $600,000 in Dedicated Street Funding dollars for a total annual budget of approximately $12.6M.

Justification:
To improve and maintain pavement surfaces citywide. Program identified in the Vancouver Comprehensive Plan (2011-2030).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: Varies

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Bridge Inspection Program

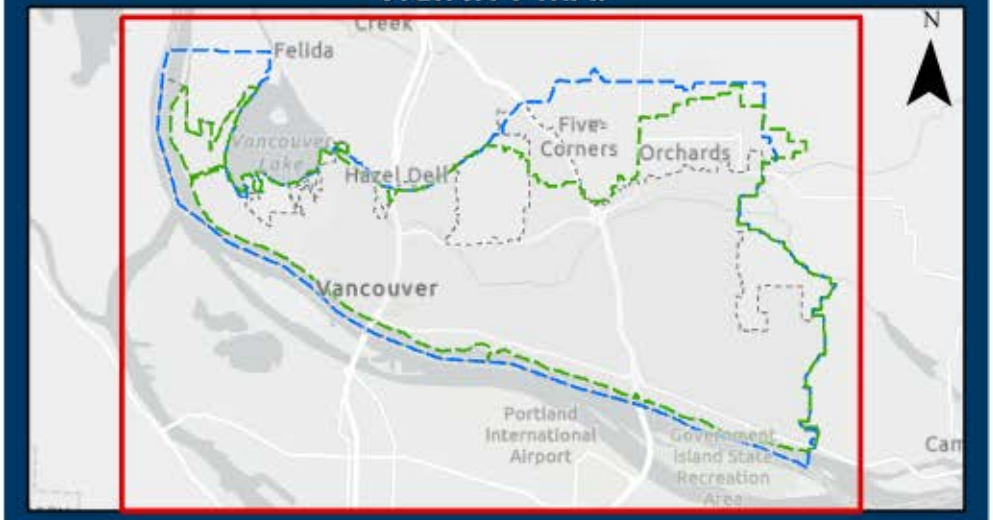
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Ongoing citywide inspection and maintenance of our bridges, as required to meet state and federal regulations. This program, formerly contracted with Clark County, is being dropped by the county and now requires hiring professional services to complete federally mandated bridge inspections and load ratings. Program budgeted at $50,000 per year.

Justification:
Maintain safe bridges in compliance with state and federal regulations. Program identified in the Vancouver Comprehensive Plan (2011-2030).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRG0256

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

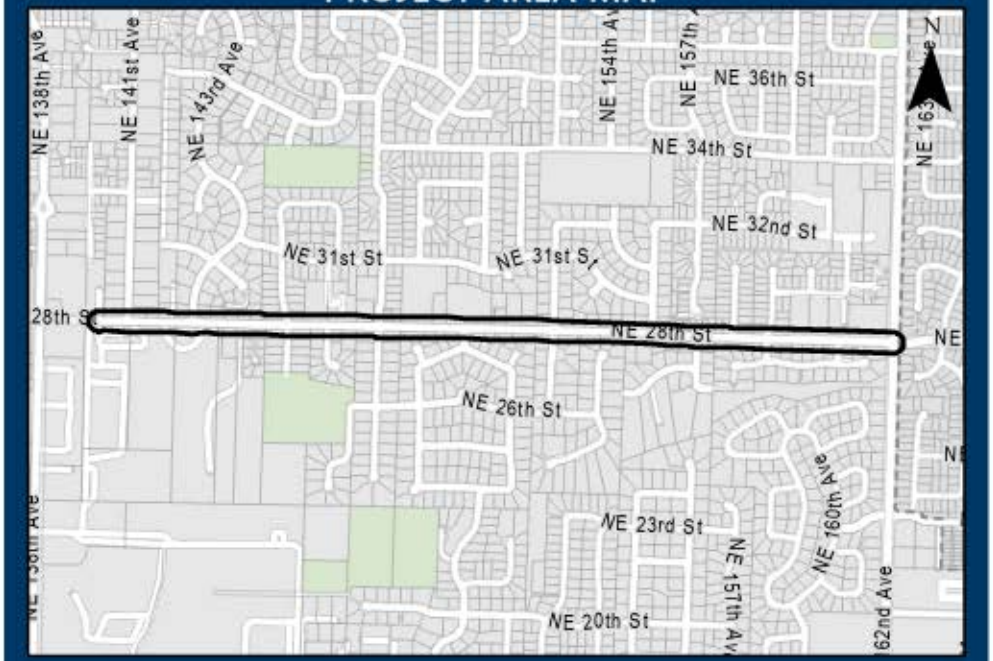
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

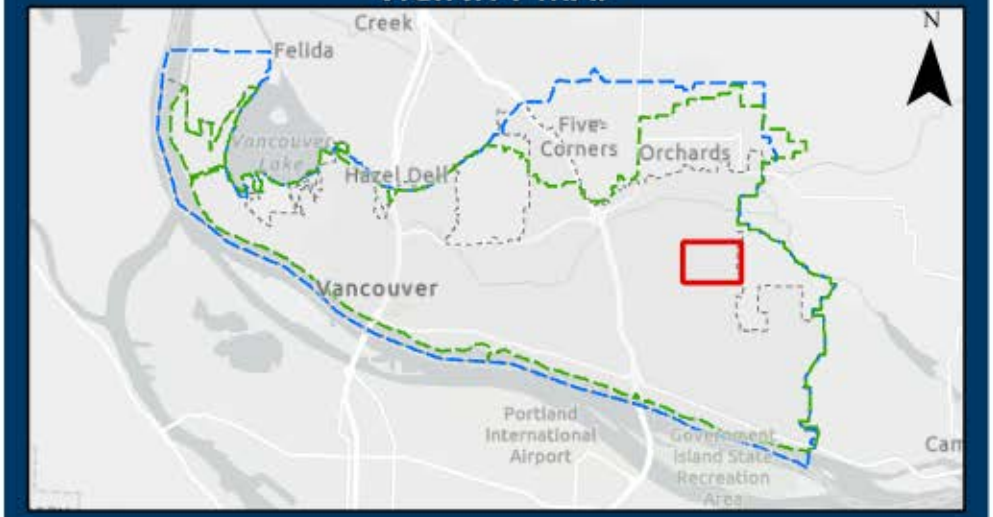
Project: Northeast 28th Street - Northeast 142nd Avenue to Northeast 162nd Avenue

Project Extent: Northeast 142nd Avenue **To:** Northeast 162nd Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Upgrade of existing 2-lane former rural road to urban 3-lane minor arterial (1 lane each direction plus center turn lane) with sidewalks, mobility lanes, streetlights, signals, school crossings, stormwater and sound walls where required. Project addresess capacity and improves pavement and safety conditions.

Justification:
Upgrade of substandard urban arterial with level of service, poor pavement and safety deficiencies. Project identified in Vancouver Comprehensive Plan (2011-2030). Based on 2012 safety report this project has potentially high safety benefits.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: Yes

Grant Amount: $5,750,000

Total Project Cost: $14,494,000

Start of Const. (year): Unknown

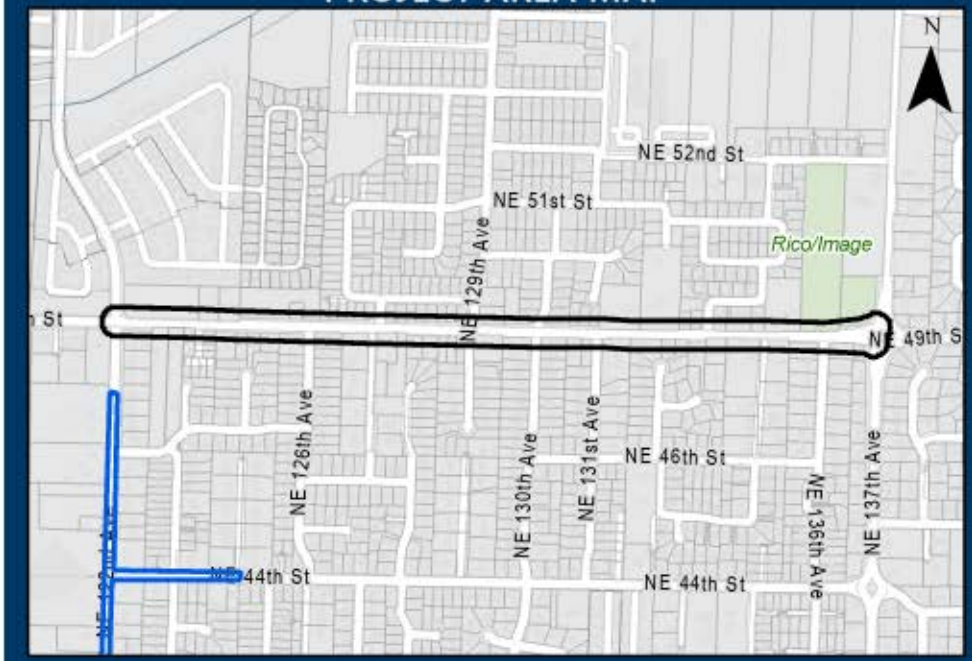
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

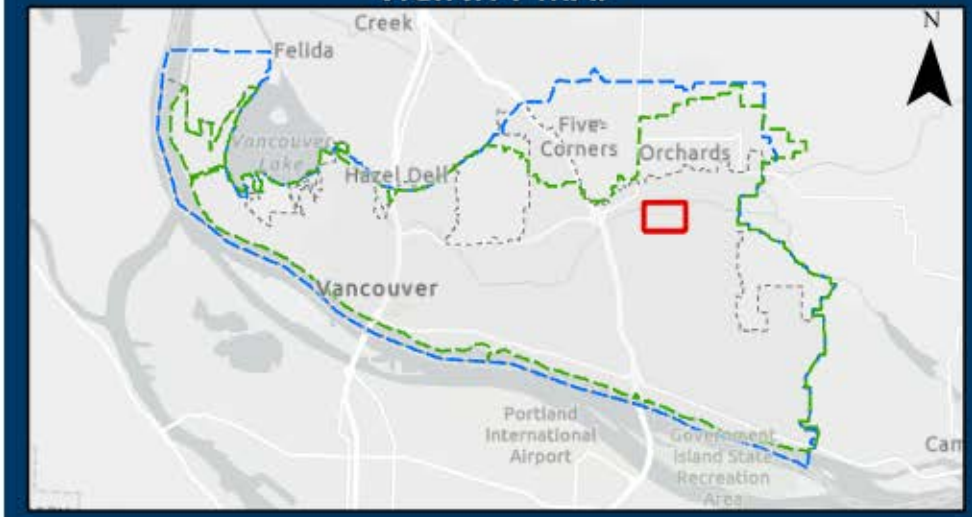
Project: Northeast 49th Street - Northeast 122nd Avenue to Northeast 137th Avenue

Project Extent: Northeast 122nd Avenue **To:** Northeast 137th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Upgrade of existing 2-lane street to 3-lane urban minor arterial (1 lane each direction and turn lane) with sidewalks, ADA Ramps, mobility lanes, and streetlights. Project helps improve capacity and safety.

Justification:
Upgrade of substandard urban arterial with level of service and safety deficiencies. Project identified in Vancouver Comprehensive Plan (2011-2030).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: Yes

Grant Amount: $562,500

Total Project Cost: $11,000,000

Start of Const. (year): Unknown

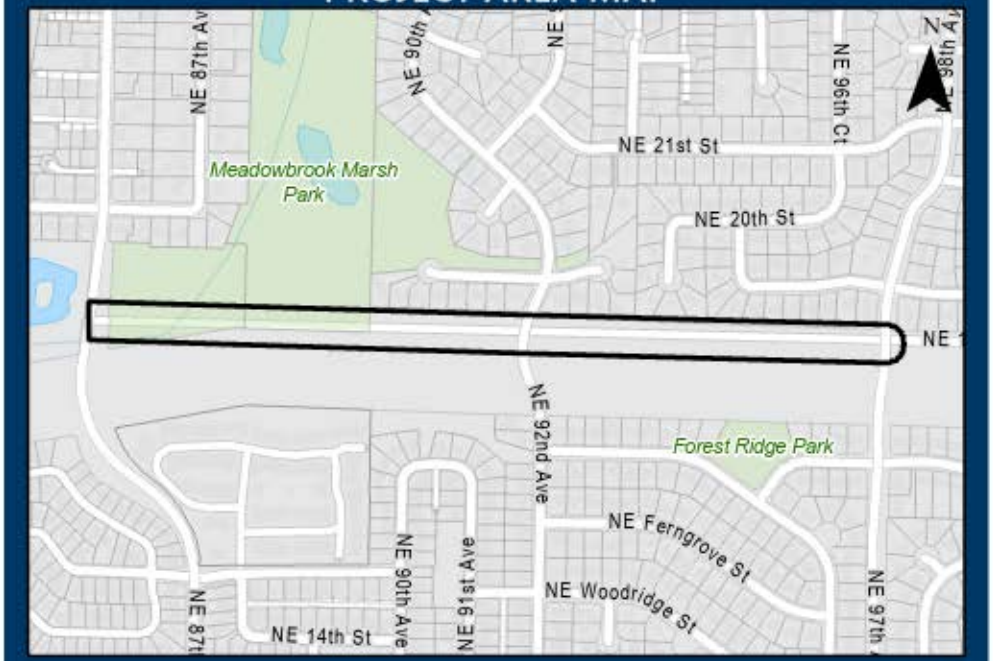
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

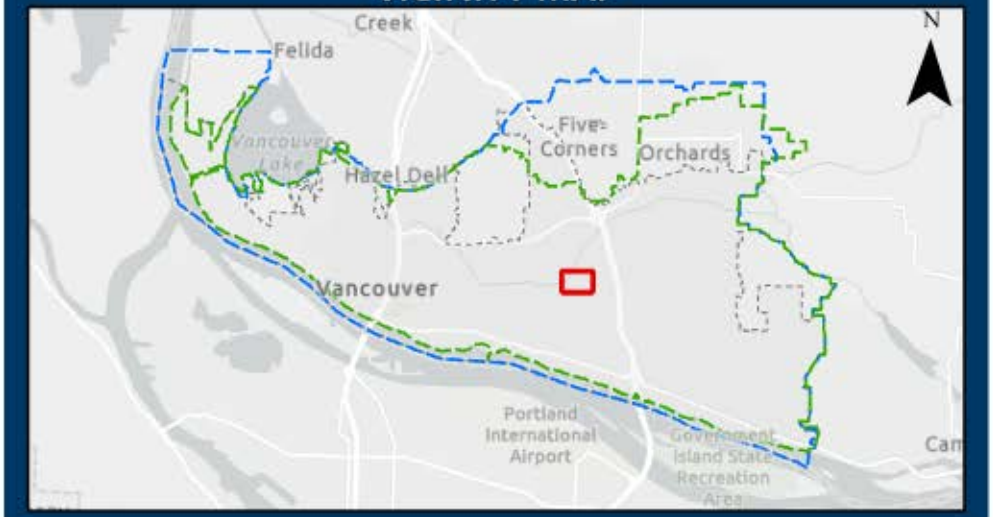
Project: Northeast 18th Street - Northeast 87th Avenue to Northeast 97th Avenue

Project Extent: Northeast 87th Avenue **To:** Northeast 97th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Long-planned construction of new minor arterial street (1 lane each direction plus turn lane) with mobility lanes, streetlights, sound walls (where required), a sidewalk on north side and shared use pathway on south side of street. Project provides planned east-west circulation. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue (Outside 6-year horizon)

Justification:
New roadway segment which provides planned east/west circulation. Project identified in Vancouver Comprehensive Plan (2011-2030). Environmental Assessment and alignment study completed and approved in 2004.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $16,000,000

Start of Const. (year): Unknown

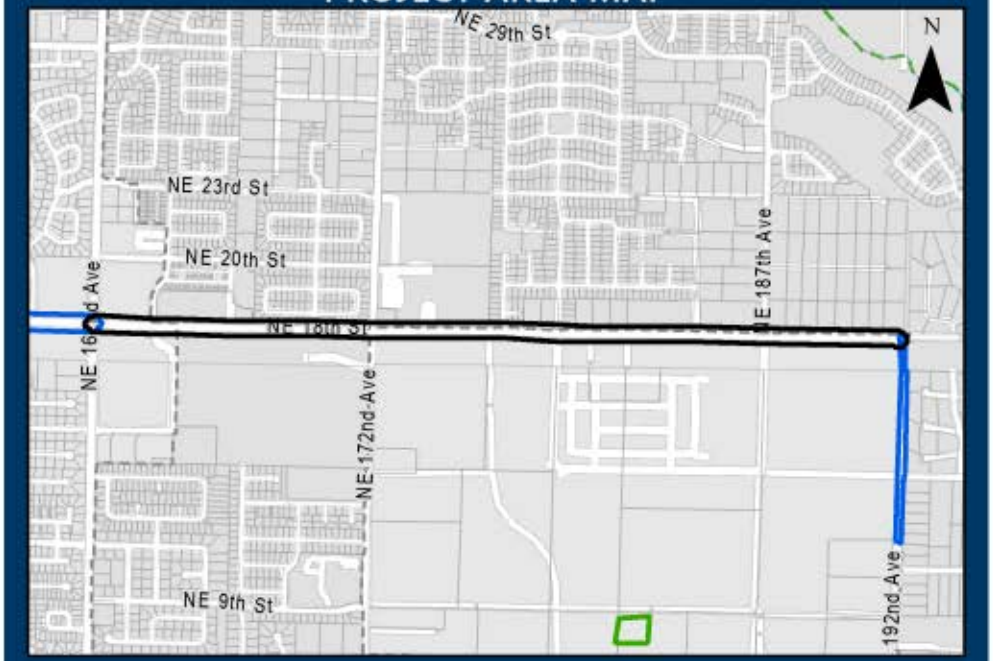
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

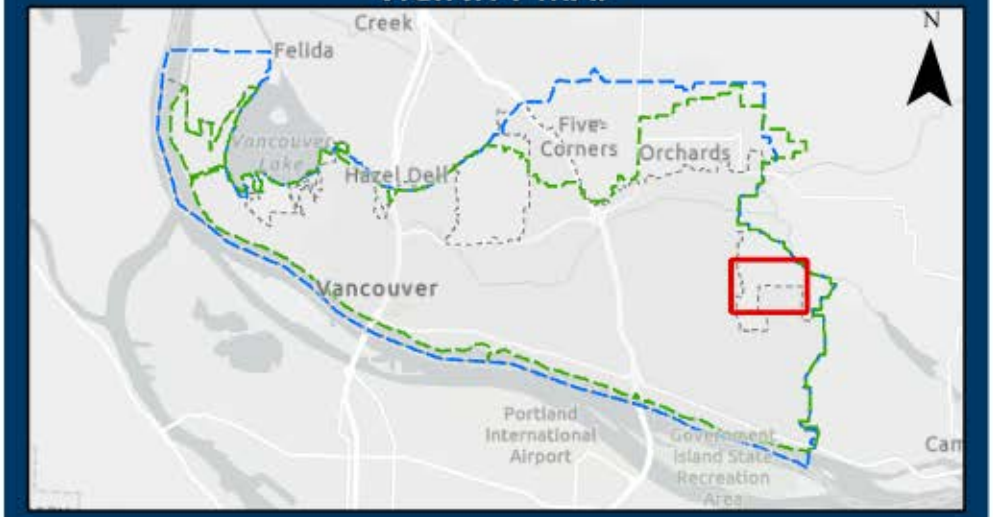
Project: Northeast 18th Street - Northeast 164th Avenue to Northeast 192nd Avenue

Project Extent: Northeast 164th Avenue **To:** Northeast 192nd Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Long-planned upgrade of 2-lane principal arterial, originally at rural standards, to increase safety and improve service levels. Improvements include additional travel lanes, mobility lanes, streetlights, sound walls, sidewalk on north side and shared use pathway on south side of street. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue. (Outside 6-year horizon)

Justification:
Substandard urban arterial with level of service and safety deficiencies. Project identified in the Vancouver Comprehensive Plan (2011-2030). Environmental Assessment alignment study completed and approved in 2004.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $20,000,000

Start of Const. (year): Unknown

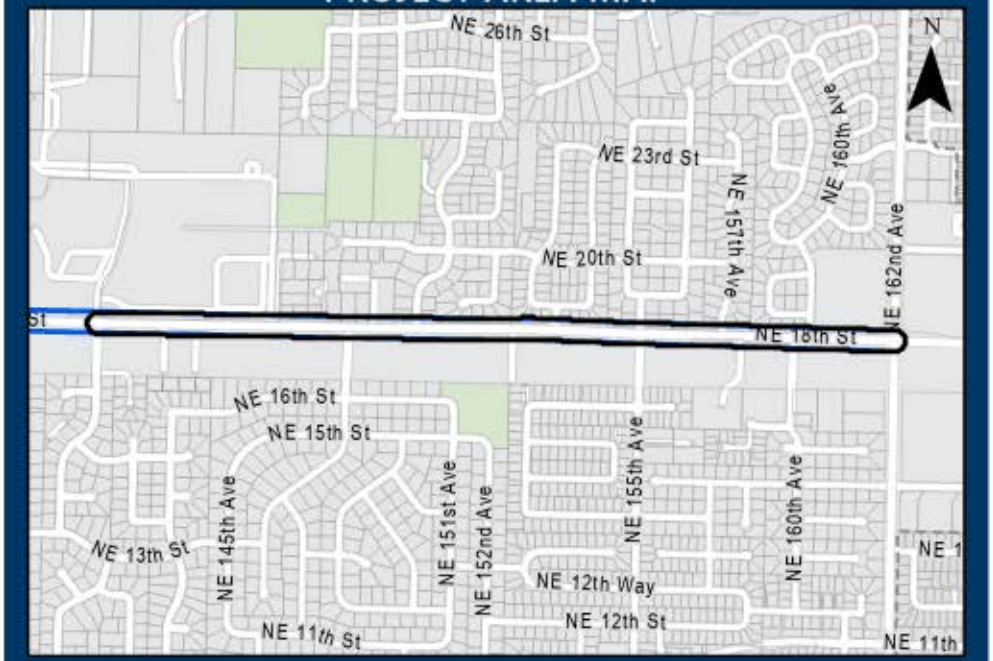
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

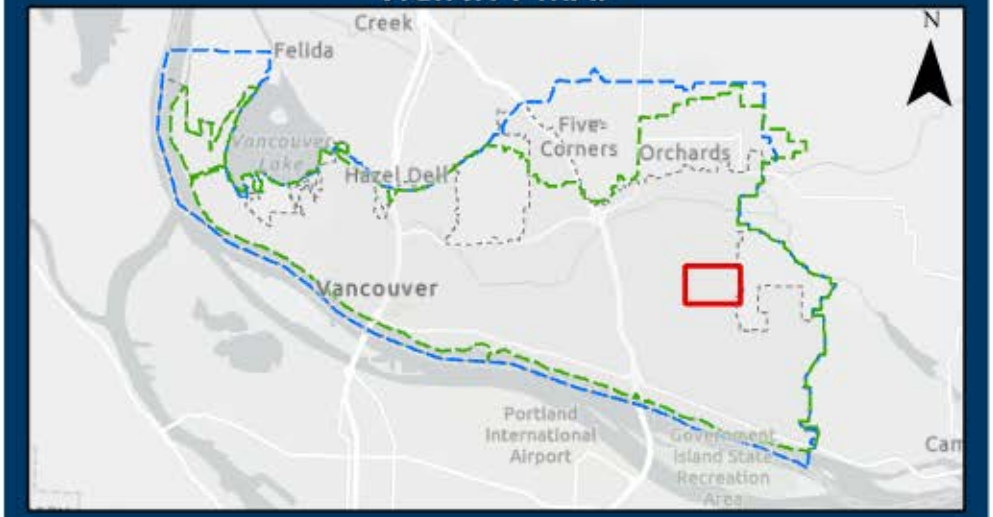
Project: Northeast 18th Street - Northeast 141st Avenue to Northeast 162nd Avenue

Project Extent: Northeast 141st Avenue **To:** Northeast 162nd Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Long-planned urban upgrade of 2-lane road to principal arterial standards. Originally built at rural standards to improve service and safety. Improvements include 5-lane principal arterial (2 lanes each direction plus turn lane) with separated and protected mobility lanes, streetlights, sound walls (where required), sidewalk and ADA ramps, and shared use pathway on south side of street. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue.

Justification:
Substandard urban arterial with level of service and safety deficiencies. Environmental Assessment alignment study completed and approved in 2004. Project identified in the Vancouver Comprehensive Plan (2011-2030).

Priority Score:
Medium-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ100788
Grant Funded:	Yes
Grant Amount:	$7,500,000
Total Project Cost:	$18,350,000
Start of Const. (year):	2027

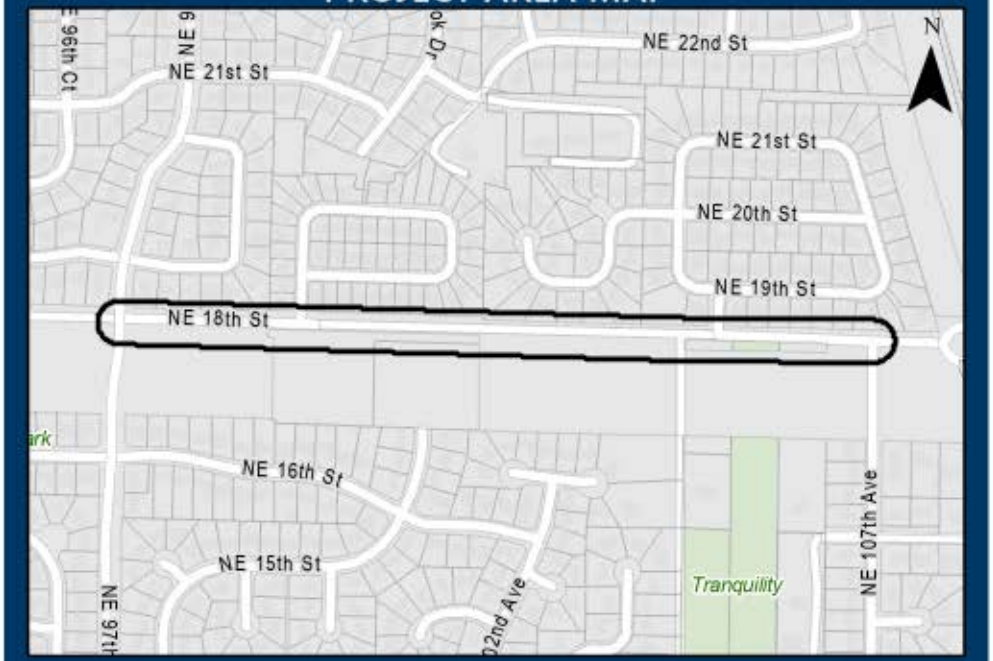
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

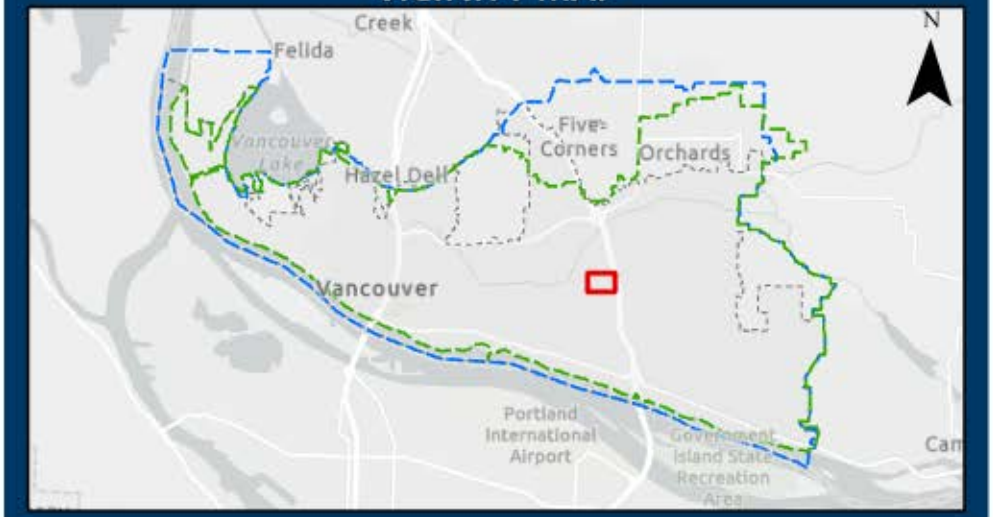
Project: Northeast 18th Street - Northeast 97th Avenue to Northeast 107th Avenue

Project Extent: Northeast 97th Avenue **To:** Northeast 107th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Long-planned new urban arterial and upgrade of existing segments to current arterial standards. The improvement will be a multimodal facility including travel lanes, evaluation of roundabouts at intersections, mobility lanes, streetlights, ADA accessible pedestrian ramps, sound walls (where required), sidewalk, and a multi-use pathway. The east end of the project will connect to the recently constructed WSDOT/Interstate-205 on ramp and roundabout. Design/ROW phases are continuing. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue. Identified by regional arterial improvement plan.

Justification:
Identified by regional arterial improvement plan.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ071616
Grant Funded:	Yes
Grant Amount:	$10,000,000
Total Project Cost:	$25,000,000
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: MacArthur and Leiser Improvements

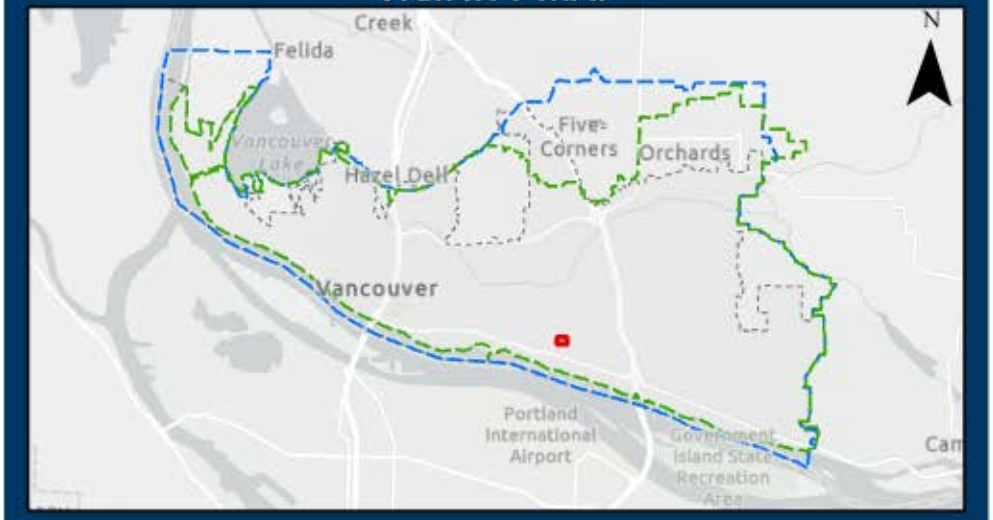
Project Extent:

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Intersection project to modify an existing 4-way-stop intersection that is operating at near maximum capacity. Improvements include new traffic signal or roundabout, upgraded sidewalks, ADA ramps and streetlights to improve traffic system, safety, mobility, and accessibility.

Justification:
Identifed through community feedback, roadway operational analysis, and also identified through the Heights District Plan (2020).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101230

Grant Funded: No

Grant Amount: $

Total Project Cost: $4,729,400

Start of Const. (year): Unknown

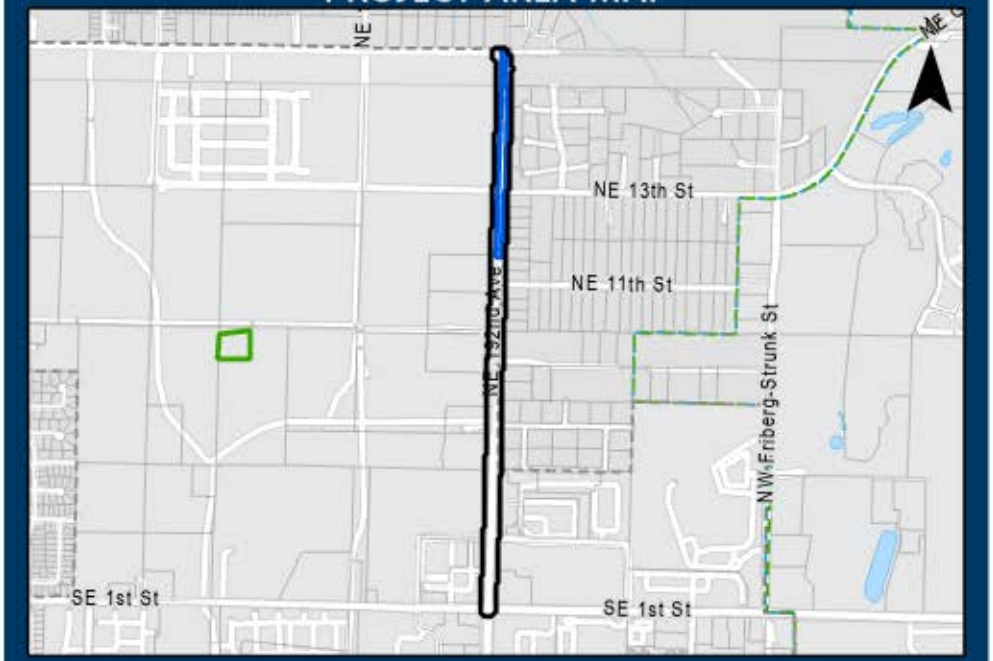
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

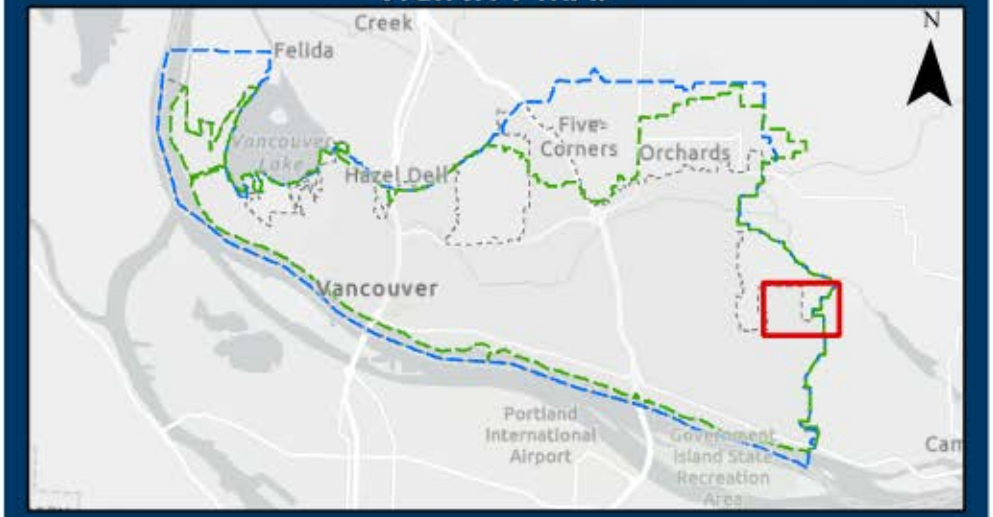
Project: Northeast 192nd Avenue - Northeast 18th Street to Southeast 1st Street

Project Extent: Northeast 18th Street **To:** Southeast 1st Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Urban upgrade of existing 2-lane street. Improvements include additional travel lanes, sidewalks, mobility lanes, ADA ramps and streetlights to improve system, safety, mobility, and accessibility. Received a federal grant to begin the design phase and RTC grant for ROW.

Justification:
This project originated from Section 30 Subarea Plan (2009).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100868

Grant Funded: Yes

Grant Amount: $7,250,000

Total Project Cost: $21,242,000

Start of Const. (year): Unknown

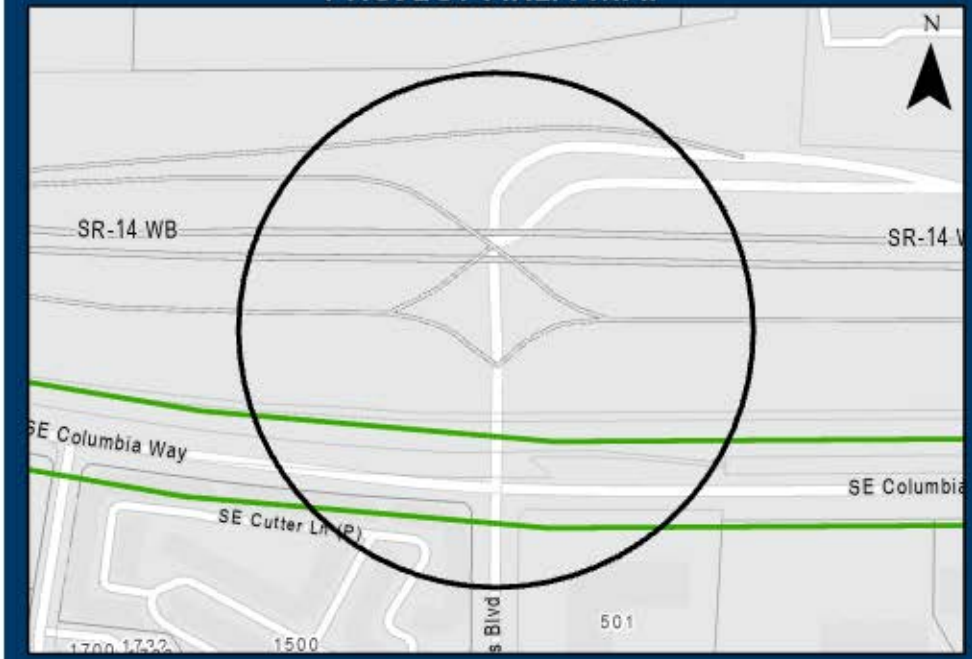
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

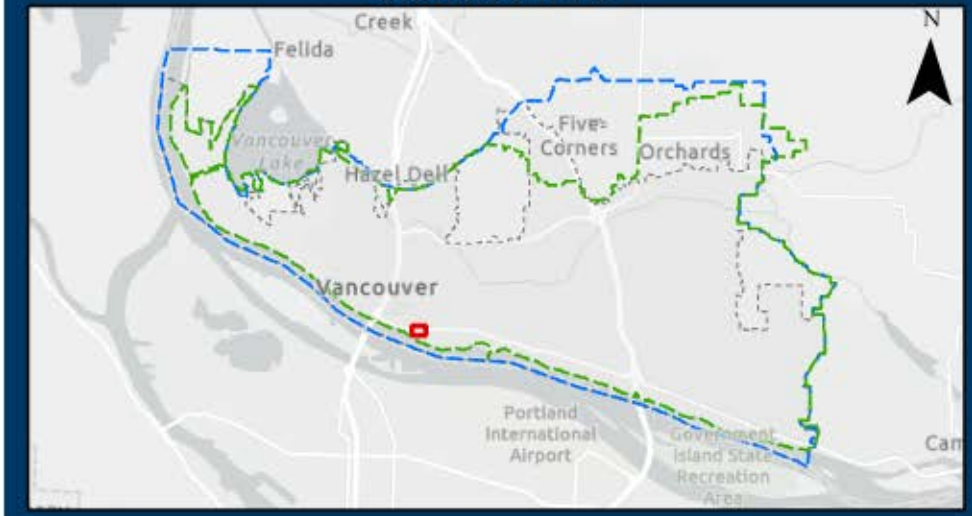
Project: Columbia Shores Boulevard at Columbia Way - BNSF Undercrossing Widening

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Project to widen existing railroad undercrossing portal and improve Columbia Shores/Columbia Way intersection to address service levels and increase pedestrian and mobility access. Total scope of project is undefined. (Outside 6-year horizon)

Justification:
Level of service deficiency and sub-standard pedestrian and bicycle access conditions. Identified by staff and through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $30,000,000

Start of Const. (year): Unknown

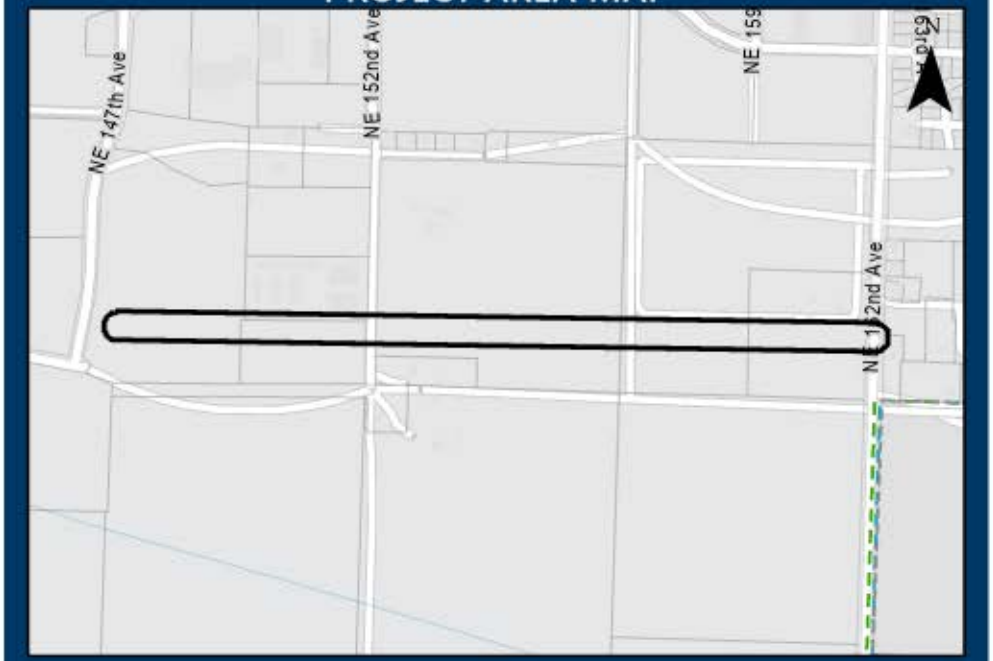
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

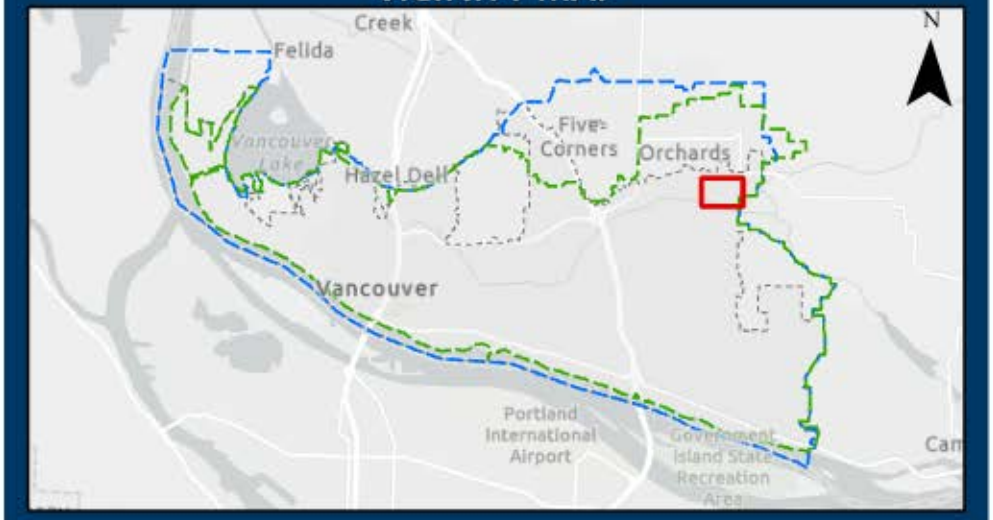
Project: Northeast 59th Street - Northeast 147th Avenue to Northeast 162nd Avenue

Project Extent: Northeast 147th Avenue **To:** Northeast 162nd Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New minor arterial street (1 lane each direction plus turn lane) with sidewalks, ADA ramps, mobility lanes, streetlights and surface water treatment. Project will address circulation needs, improve safety, mobility, accessiblity and stormwater management. (Outside 6-year horizon)

Justification:
New roadway segment needed to address circulation needs within sub district. Project identifed as part of the Bircher area redevelopment.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $9,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

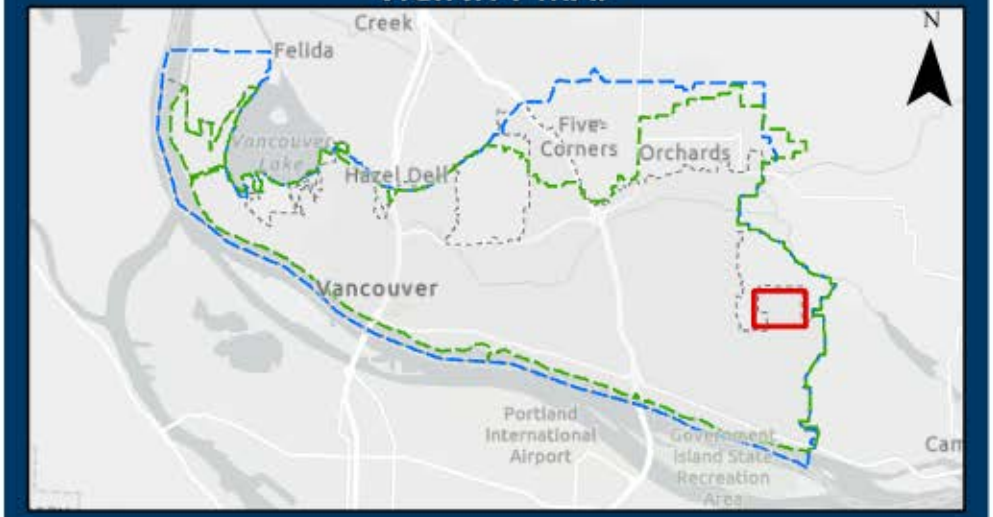
Project: Northeast 9th Street - Northeast 172nd Avenue to Northeast 192nd Avenue

Project Extent: Northeast 172nd Avenue **To:** Northeast 192nd Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New urban collector street (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes, and streetlights.

Justification:
This priority east-west circulation route is part of Section 30 Subarea Plan (2009) and also where this project originated.

Priority Score:
Medium-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $12,000,000

Start of Const. (year): Unknown

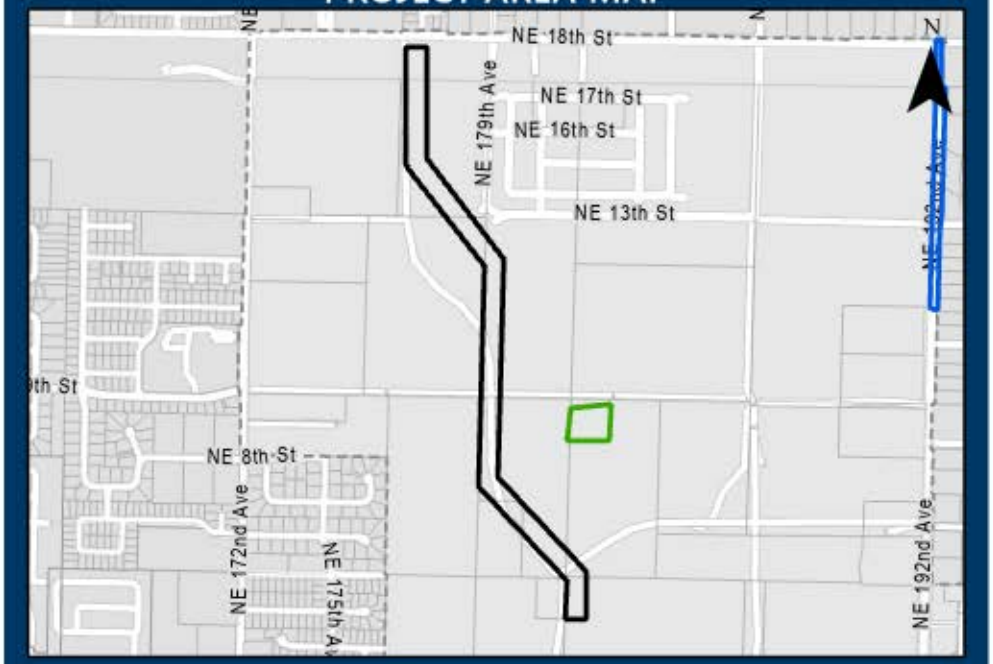
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

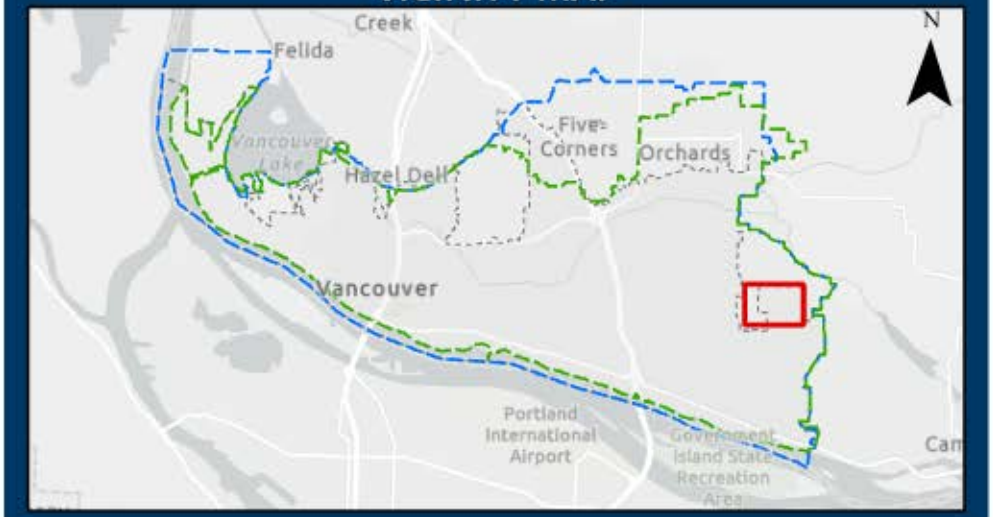
Project: Northeast 184th Avenue - Northeast 4th Street to Northeast 18th Street

Project Extent: Northeast 4th Street **To:** Northeast 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New urban collector street (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights. Developer will construct the section from Southeast 1st Street to 4th Street. (Outside 6-year horizon)

Justification:
This priority north to south circulation route is part of Section 30 Subarea Plan (2009) and also where this project originated.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $14,000,000

Start of Const. (year): Unknown

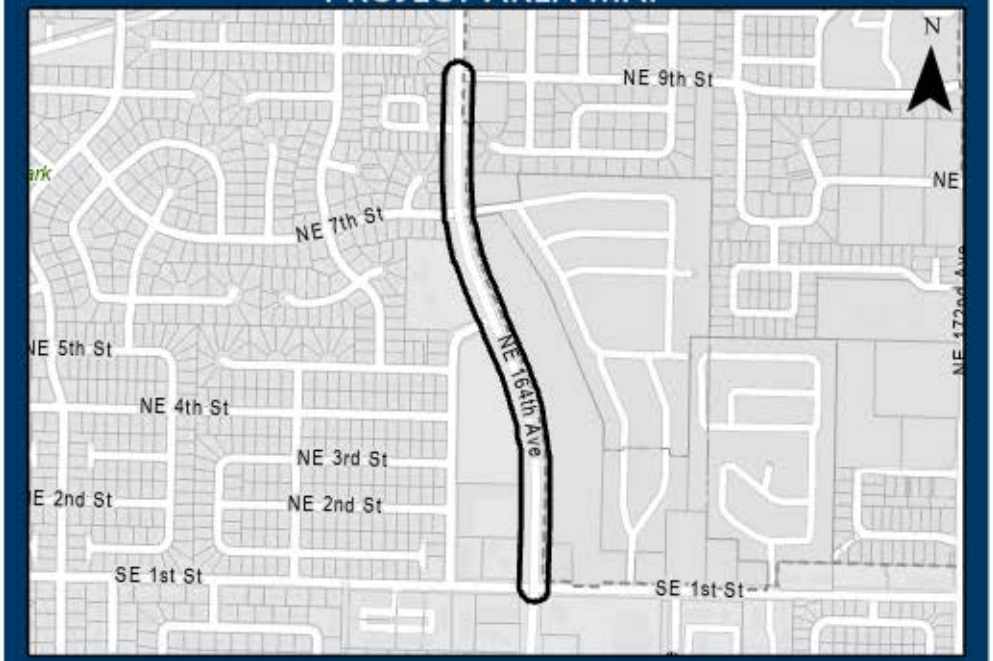
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

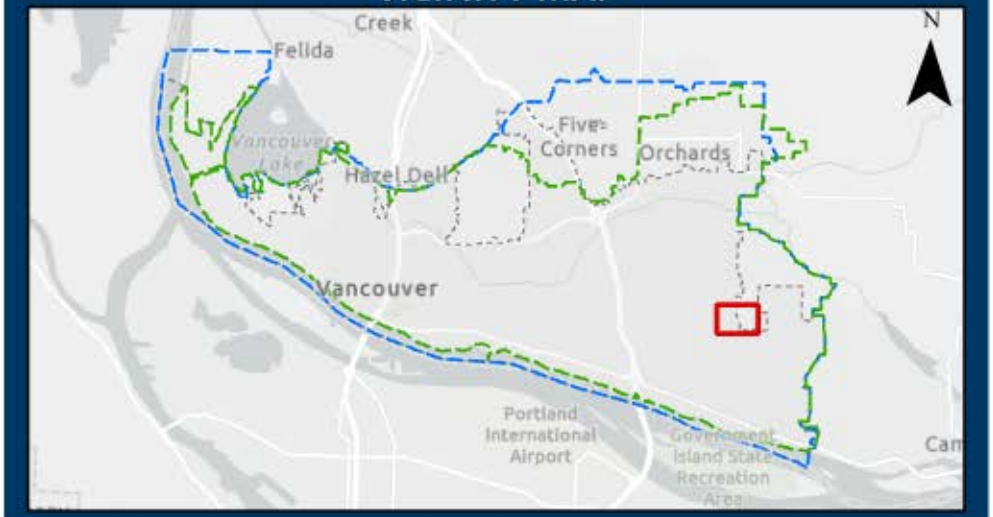
Project: Northeast 162nd Avenue - Southeast 1st Street to Northeast 9th Street

Project Extent: Southeast 1st Street **To:** Northeast 9th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Upgrade of 5-lane road to 7-lane principal arterial street (3 lanes each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights. Roadway cross section will match Northeast 162nd Avenue to the north and south. (Outside 6-year horizon)

Justification:
Improvement listed in Vancouver Comprehensive Plan (2011-2030).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $13,000,000

Start of Const. (year): Unknown

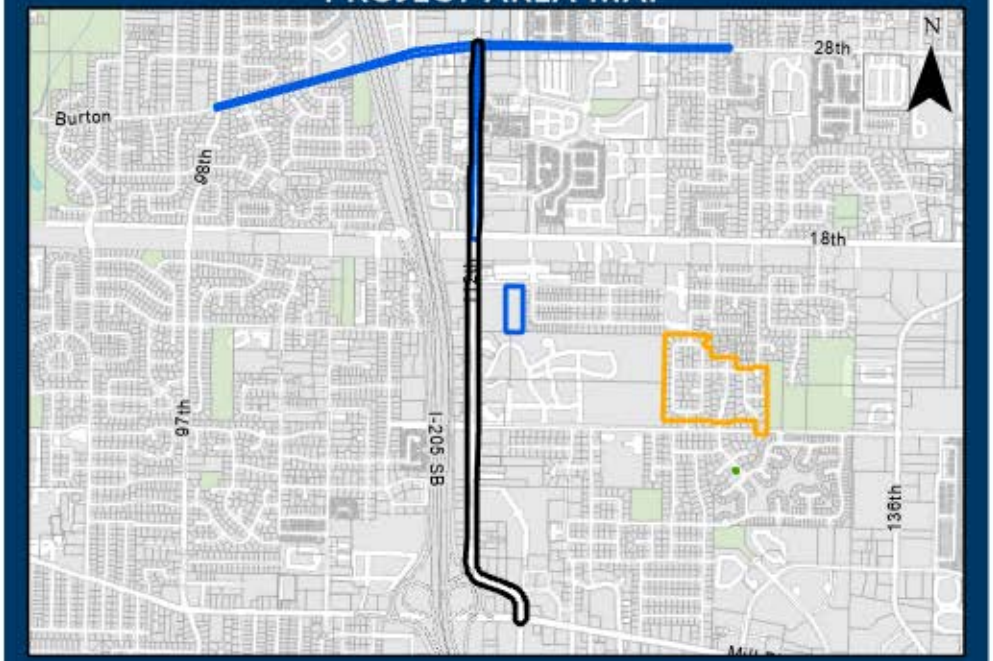
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

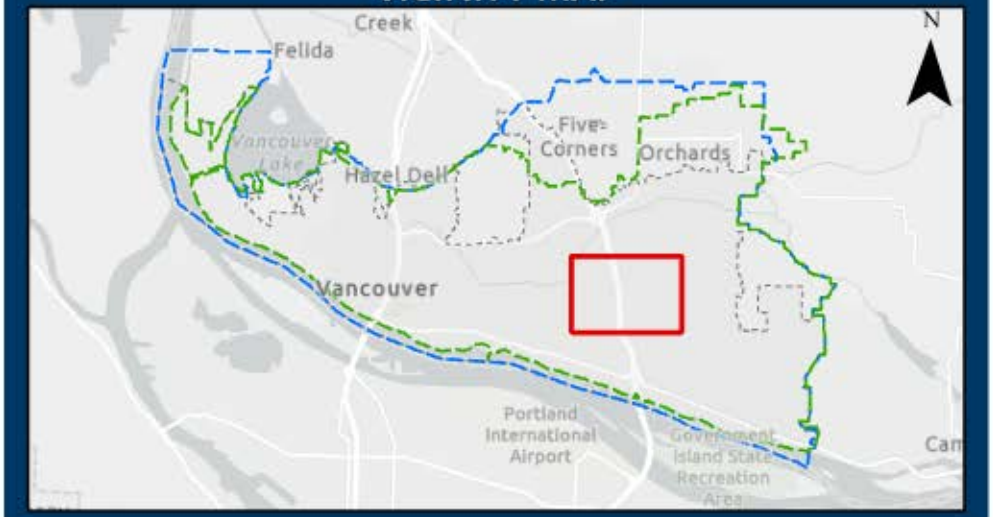
Project: Northeast 112th Avenue - East Mill Plain Boulevard to Northeast 28th Street Safety and Mobility Complete Street

Project Extent: East Mill Plain Boulevard **To:** Northeast 28th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Corridor improvements to bring Northeast 112th Avenue up to urban arterial standards, and address safety and accessibility issues for all modes of travel.

Justification:
Originated from 112th Corridor Subarea Plan (2011) and the Northeast 112th Safety and Mobility Project (2024).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $3,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

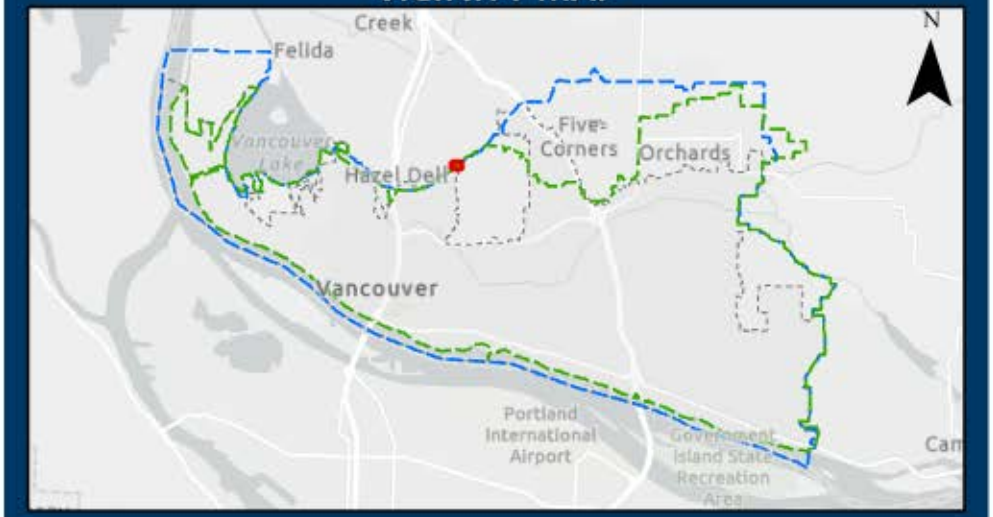
Project: Northeast Saint Johns Boulevard and Northeast 68th Street

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Modify existing intersection to improve traffic safety and level of service. (Outside 6-year horizon)

Justification:
Level of service deficiency. Identified through the development review process and included in the Saint Johns/Saint James Safety and Mobility Project for active transportation improvements.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

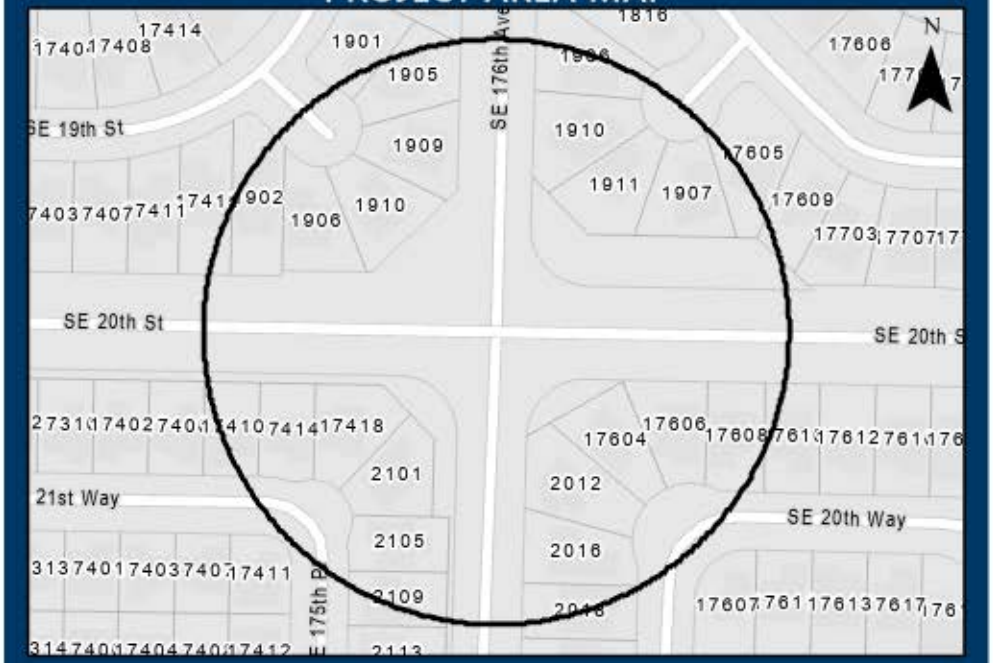
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

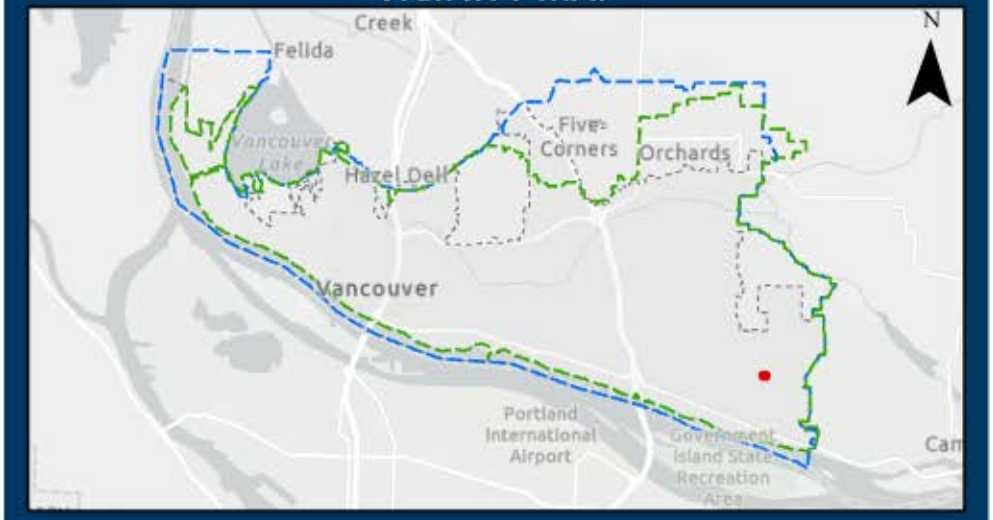
Project: Southeast 20th Street and Southeast 176th Avenue

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Modify existing intersection to improve traffic safety, operations and level of service.

Justification:
Level of service deficiency. Identified through the development review process.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

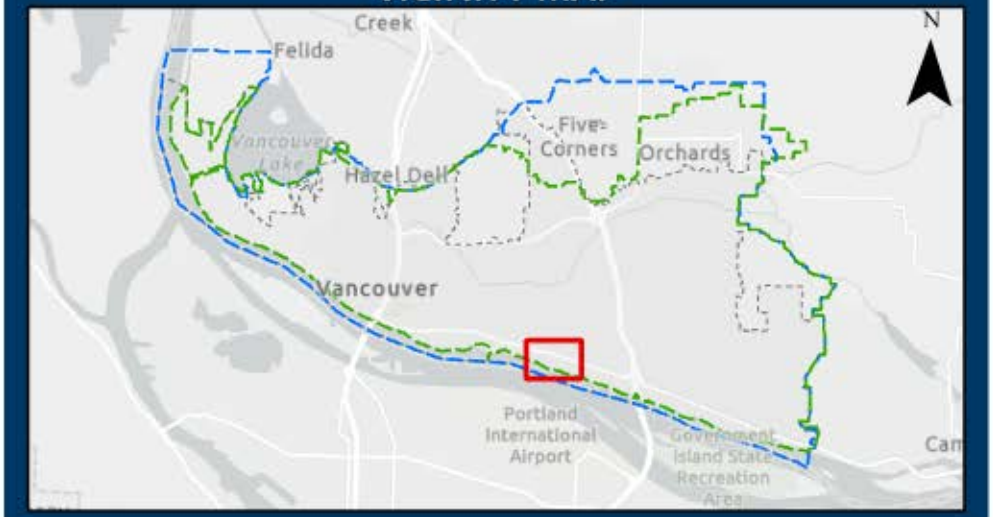
Project: Evergreen Trail - Chelsea to Image

Project Extent: Southeast Chelsea Avenue **To:** Southeast Image Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Upgrade roadway with 6 to 10 foot pedestrian pathway on south side, a priority east-west pedestrian and mobility lane corridor.

Justification:
Substandard roadway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ071455

Grant Funded: Yes

Grant Amount: $2,500,000

Total Project Cost: $4,000,000

Start of Const. (year): 2026

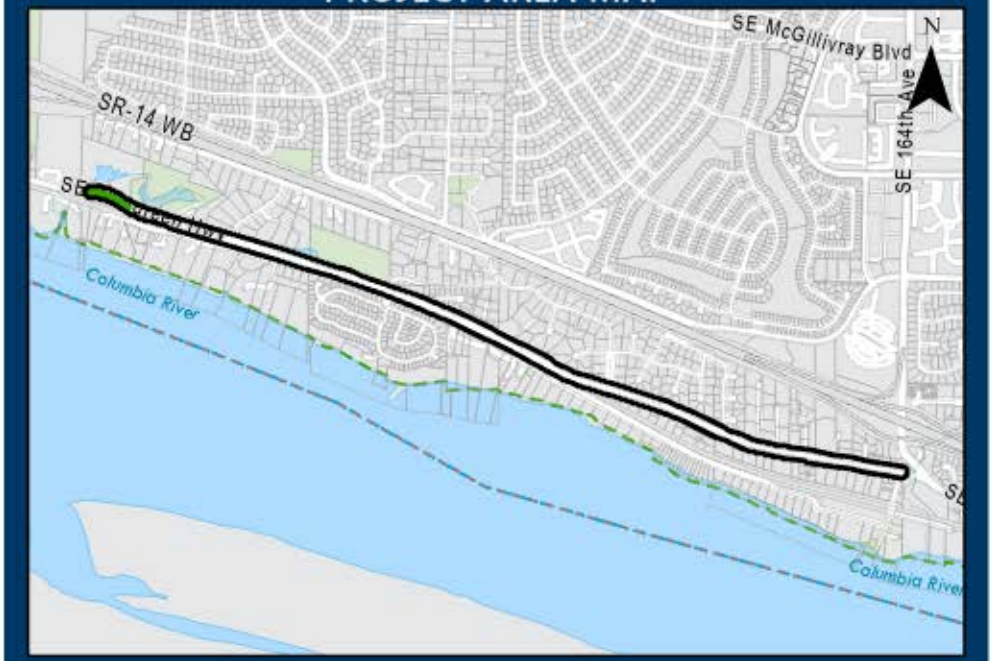
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

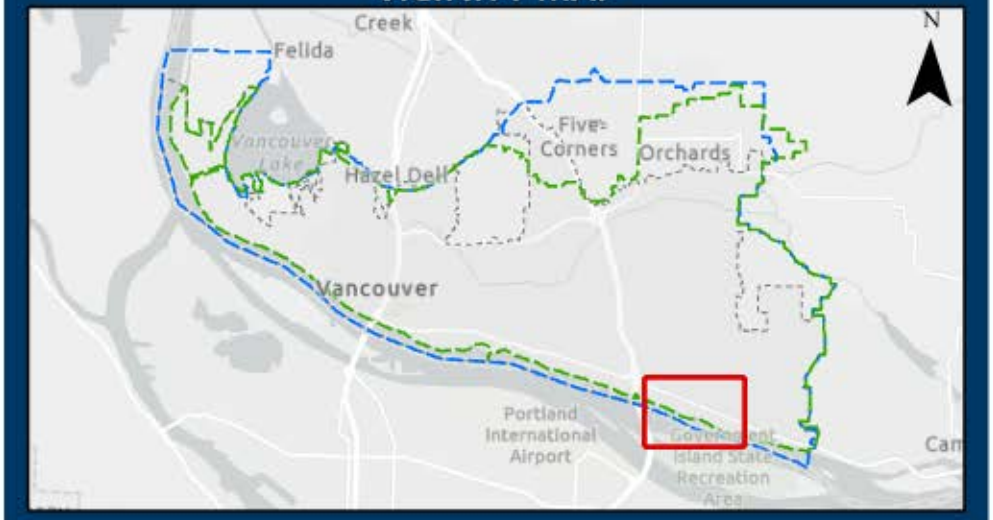
Project: Evergreen Highway Pathway - Columbia Springs to Southeast 164th Avenue

Project Extent: Southeast Silver Springs Drive **To:** Southeast 164th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Unfunded

PROJECT

Description:
Upgrade roadway with 6 to 10 foot pedestrian pathway, a priority east-west pedestrian and mobility lane corridor. (Outside 6-year horizon)

Justification:
Substandard Roadway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $7,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

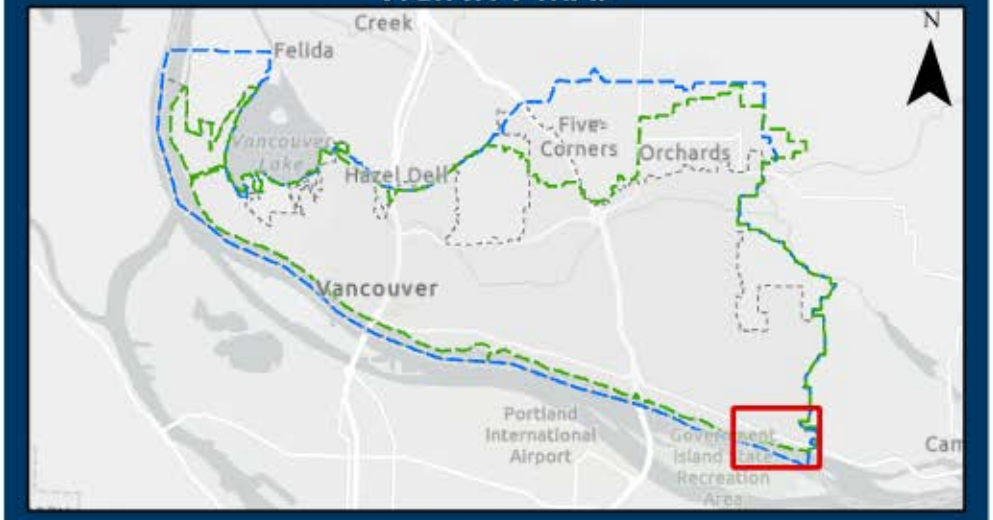
Project: Evergreen Highway Pathway - Southeast 164th Avenue to East City Limits

Project Extent: Southeast 164th Avenue **To:** East City Limits

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Upgrade roadway with 6 to 10 foot pedestrian pathway on south side, a priority east-west pedestrian and mobility lane corridor. (Outside 6-year horizon)

Justification:
Substandard Rdway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $7,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

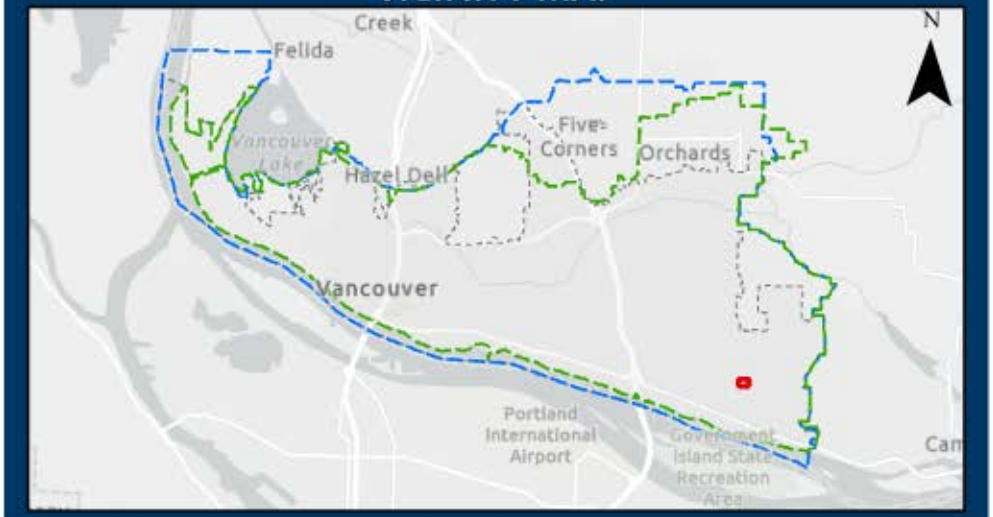
Project: Southeast McGillivray Boulevard and Southeast 166th Avenue

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Improve intersection with urban roundabout, including upgrades to ADA ramps and streetlights. (Outside 6-year horizon)

Justification:
Level of service deficiency. Identified through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ071251

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

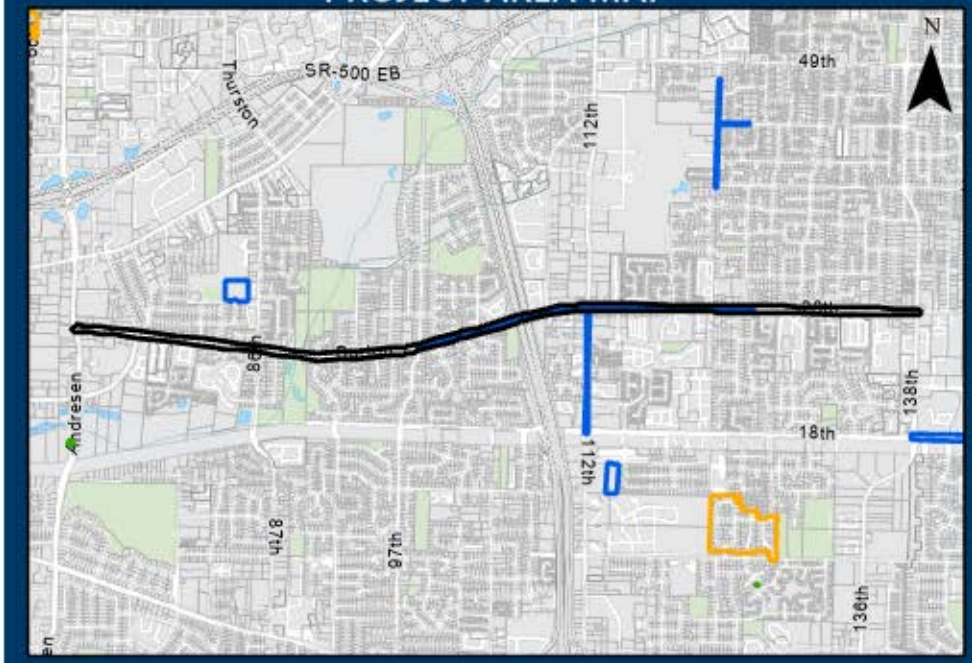
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

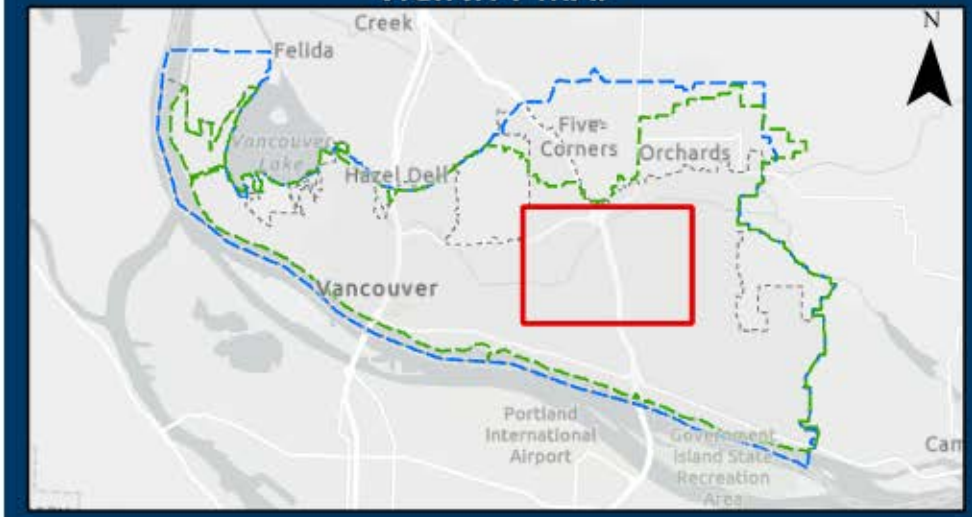
Project: Northeast Burton/28th Street - Northeast Andresen Road to Northeast 138th Avenue

Project Extent: Northeast Andresen Road **To:** Northeast 138th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Installation of fiber and connections between fiber optic cables to traffic signal controllers to improve signal operations along the corridor. (Outside 6-year horizon)

Justification:
Identified by regional arterial improvement plan.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Northwest Fruit Valley Road at La Frambois Road

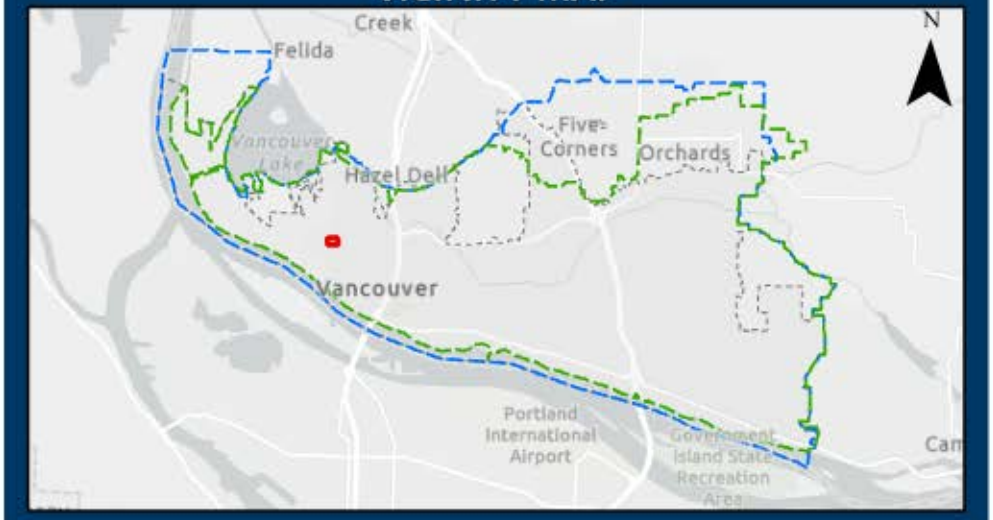
Project Extent:

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Upgrade existing signal to current standards. (Outside 6-year horizon)

Justification:
Identifed by staff and through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

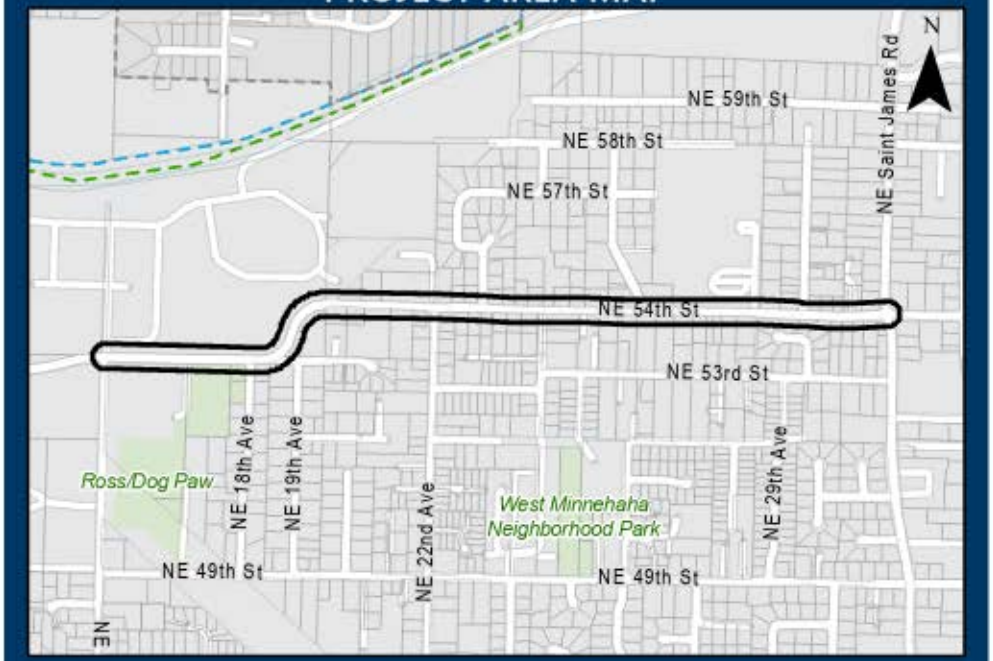
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

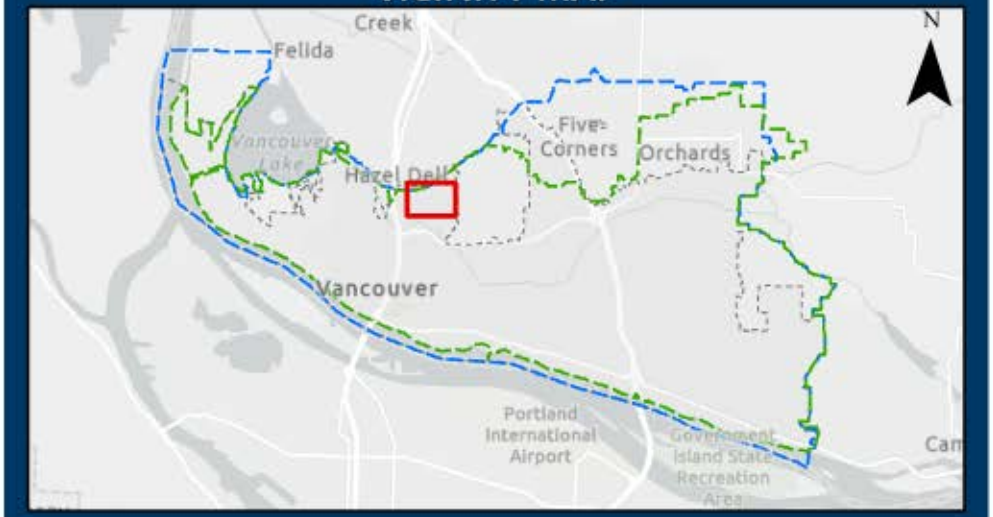
Project: Northeast 54th Street - Northeast 15th Avenue to Northeast Saint James Road

Project Extent: Northeast 15th Avenue **To:** Northeast Saint James Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Upgrade of existing 2-lane road to an urban arterial (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights to improve safety, mobility, accessibility, and level of service. New signal to be added at Northeast 54th Street and Saint Johns Boulevard.(Outside 6-year horizon)

Justification:
Upgrade of substandard urban arterial with level of service and safety deficiencies. Identified through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $14,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

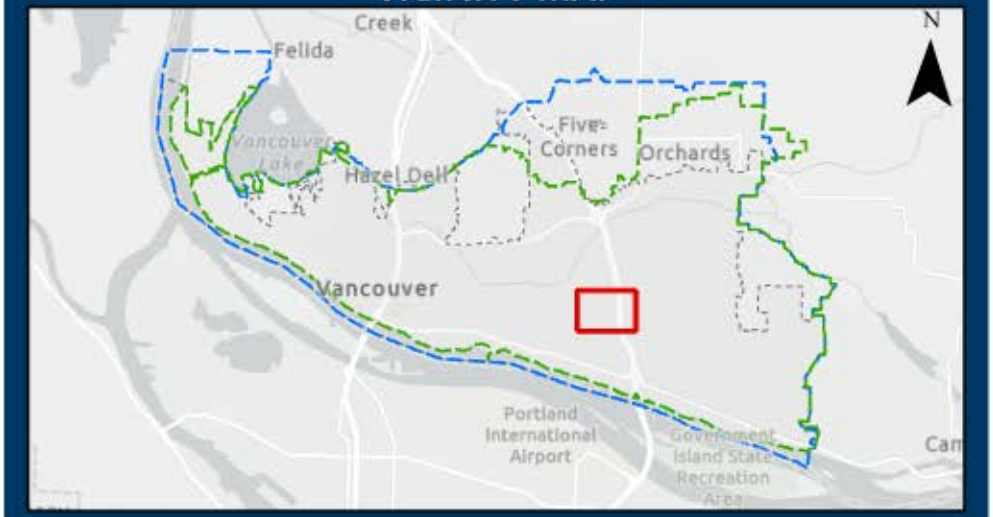
Project: Northeast 104th Avenue - Southeast Mill Plain Boulevard to Northeast 14th Street

Project Extent: Southeast Mill Plain Boulevard **To:** Northeast 14th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Upgrade of existing 2-lane road to an urban arterial (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights. (Outside 6-year horizon)

Justification:
Upgrade of substandard urban arterial with level of service and safety deficiencies. Identified through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $12,000,000

Start of Const. (year): Unknown

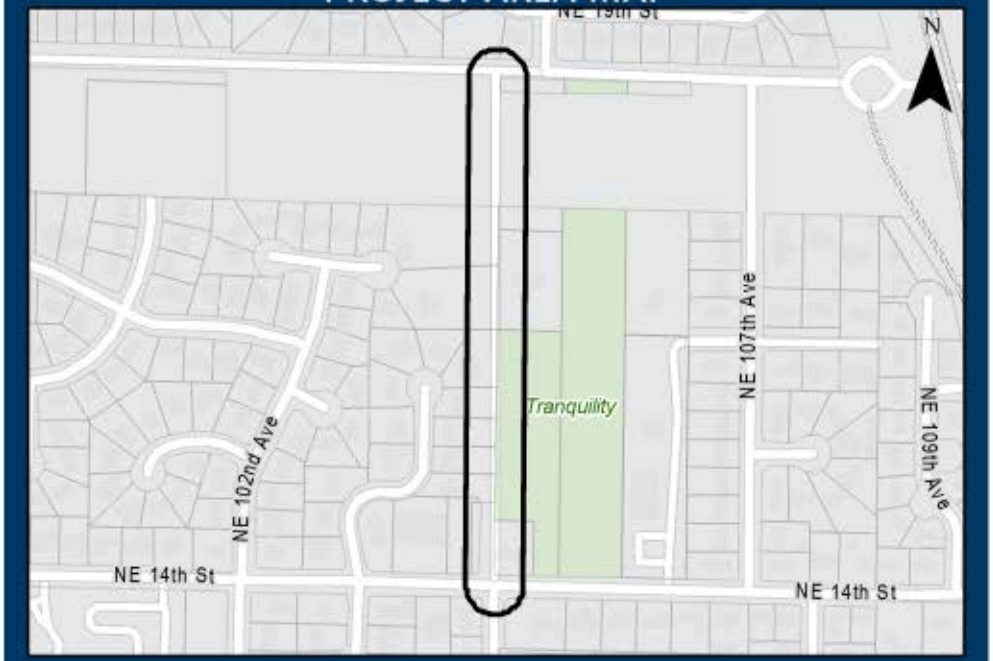
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

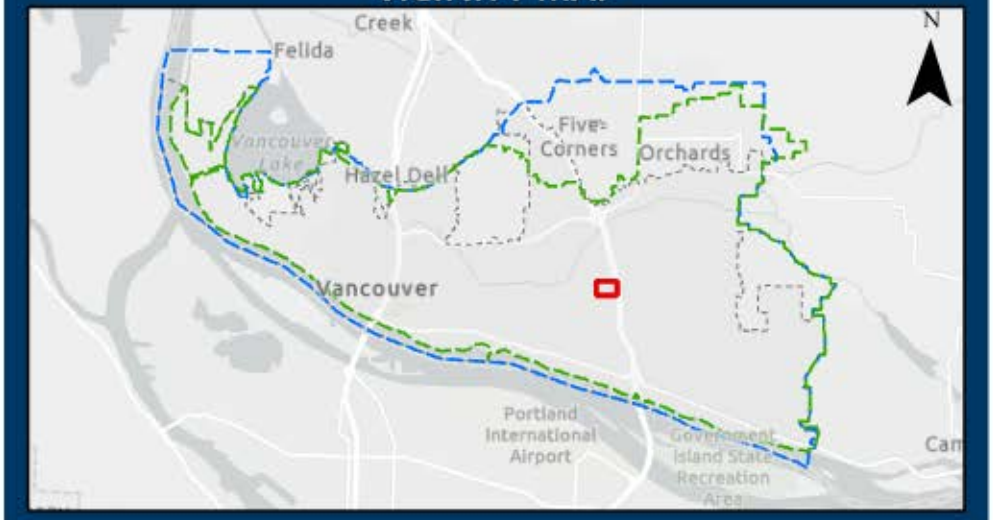
Project: Northeast 104th Avenue - Northeast 14th Street to Northeast 18th Street

Project Extent: Northeast 14th Street **To:** Northeast 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New arterial street (1 lane each direction plus turn lane), with sidewalks, ADA ramps, mobility lanes and streetlights, to increase safety, mobility, accessiblity and level of service. (Outside 6-year horizon)

Justification:
New urban arterial will address level of service and accessibility issues. Identified through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $12,000,000

Start of Const. (year): Unknown

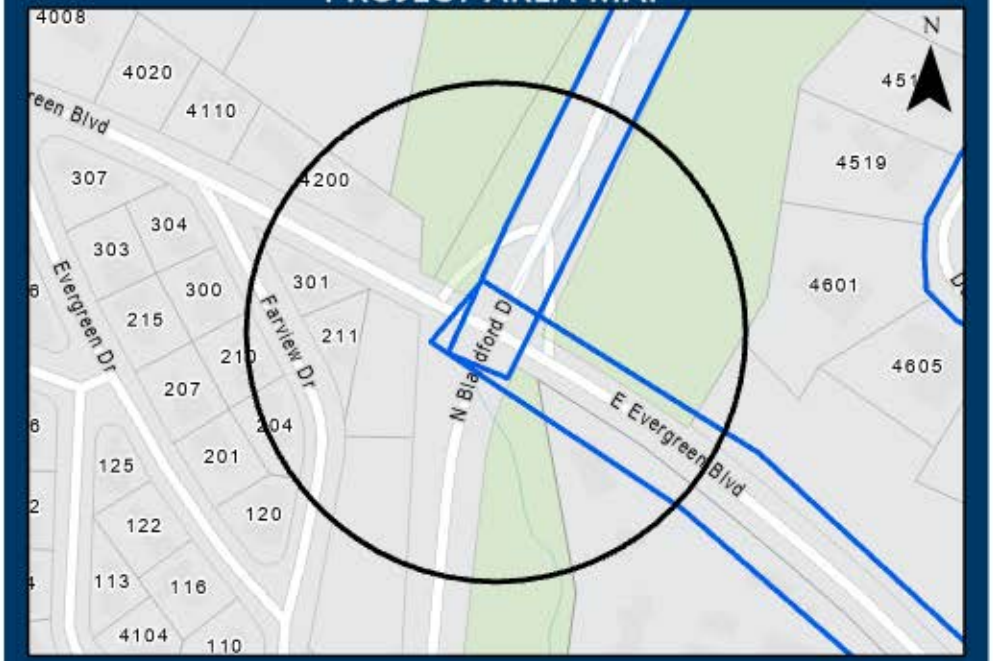
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

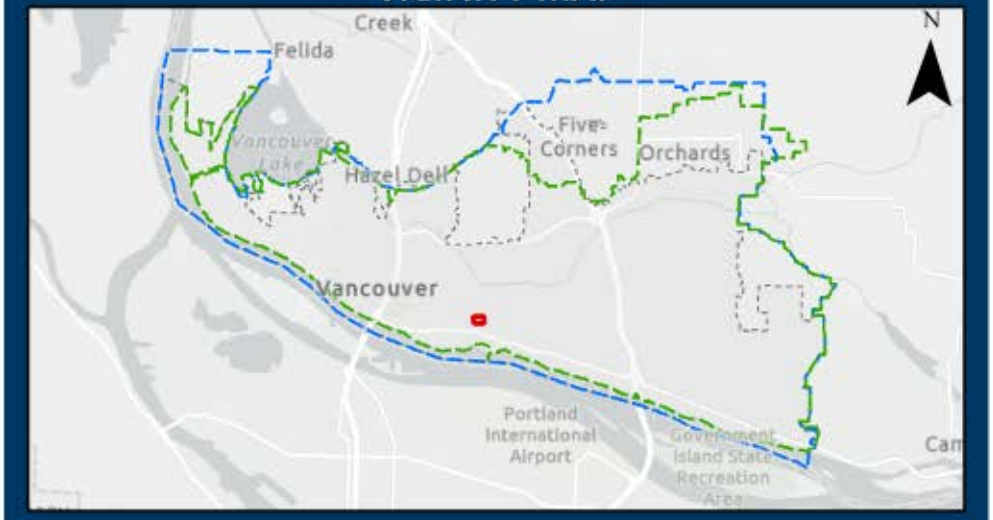
Project: East Evergreen Boulevard Bridge over South Blandford Drive

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Replace existing bridge along Evergreen Blvd. at Blandford with new structure. Project will address safety and accessibility for all modes of travel. (Outside 6-year horizon)

Justification:
Existing bridge is nearing the end of its useful life and bridge inspection reports indicate that the bridge should be planned for replacement in the near future. Identified through our Bridge Inspection Program.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $15,000,000

Start of Const. (year): Unknown

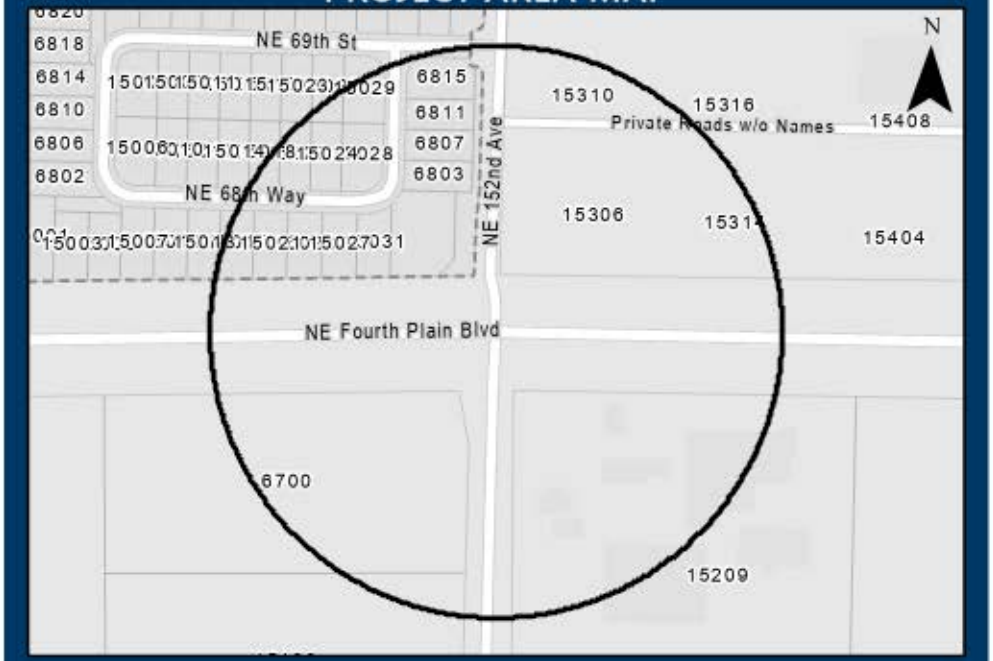
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

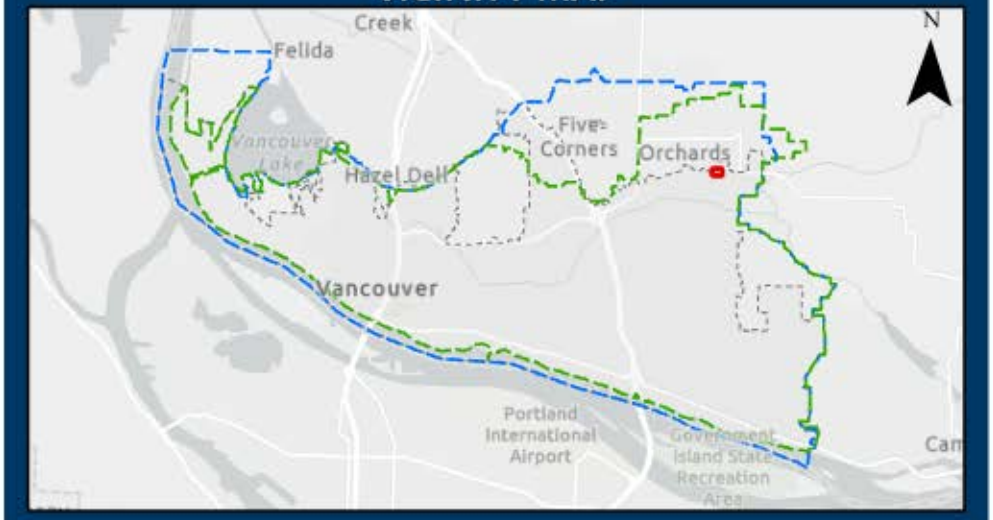
Project: Fourth Plain and 152nd Avenue Signal

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Install new signal to accommodate future growth.

Justification:
Intersection is ancipated to have a below standard LOS in the near future due to growth. Originated with Bircher area redevelopment.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100351

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,200,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

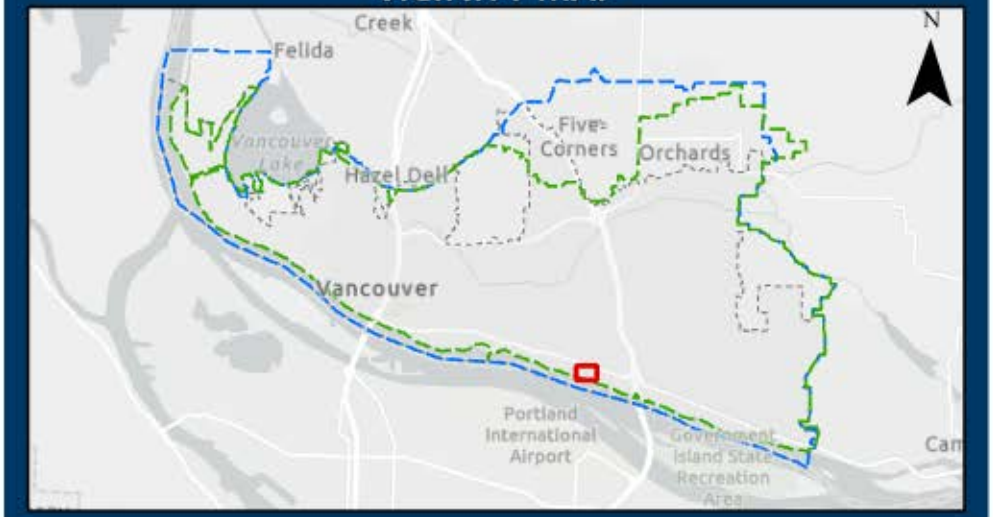
Project: Southeast Evergreen Highway Pathway - Southeast Image Road to Southeast 100th Court

Project Extent: Southeast Image Road **To:** Southeast 100th Court

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Unfunded

PROJECT

Description:
Upgrade street with 6 to 10 foot pedestrian pathway on south side of roadway, a priority east/west pedestrian and mobility lane corridor. Design and ROW funded. No funding for construction.

Justification:
Substandard roadway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ071448

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Multi Modal Safety and Accessibility Program

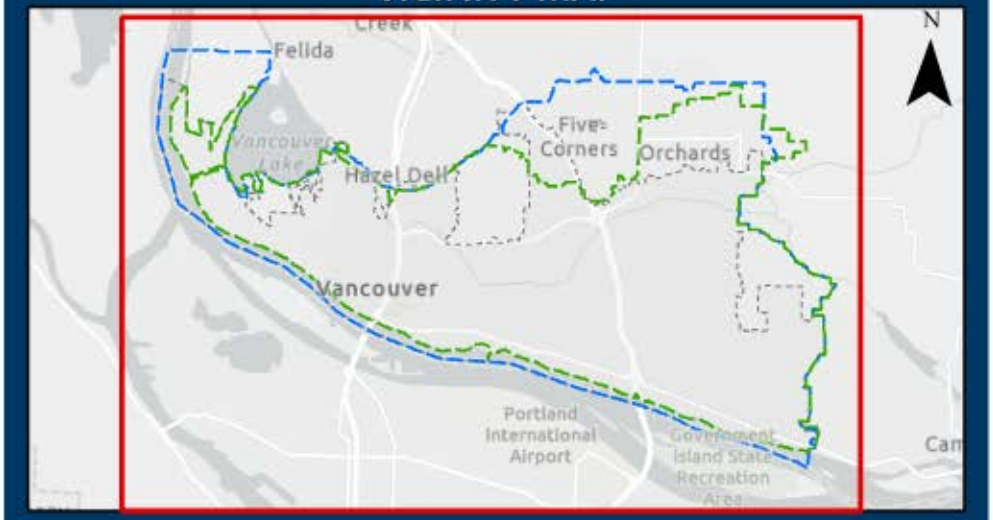
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Ongoing program budgeted at $1.5 million per year, to address safety and accessibility for people walking, biking, and rolling.

Justification:
Program will be used to address safety and accessibility deficiencies throughout the City including, but not limited to, pedestrian, bicycles, and Americans with Disability Act.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ072459

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

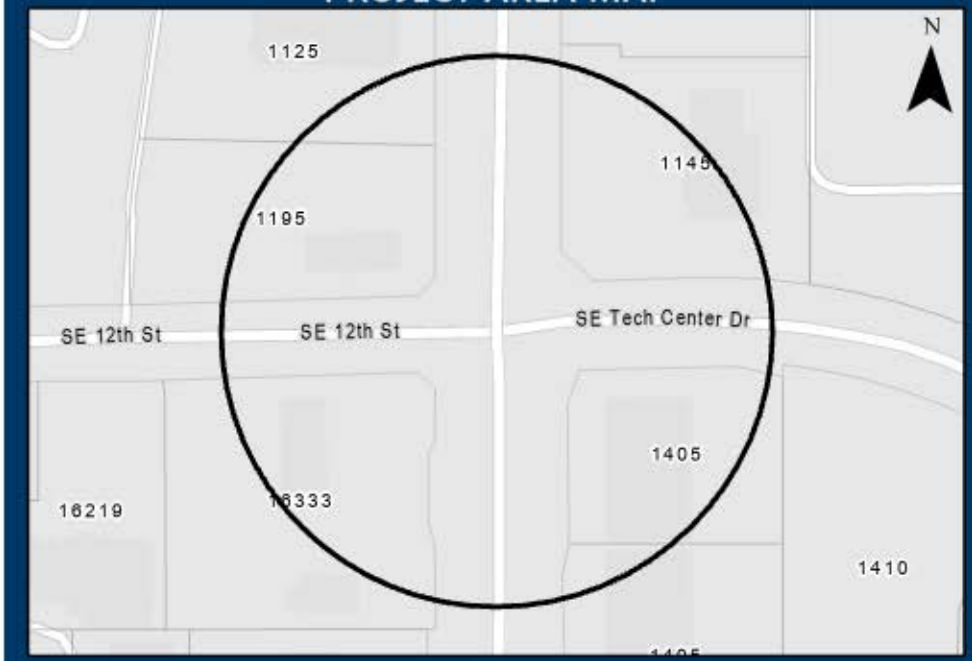
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

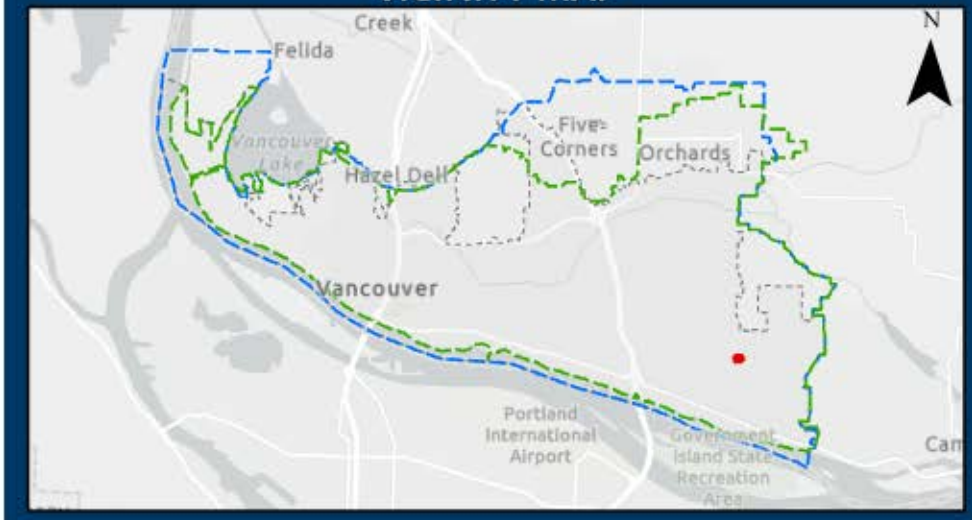
Project: Southeast 164th Avenue and Southeast 12th Street Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Increase left-turn movement capacity at intersection of Southeast 164th Avenue and Southeast 12th Street to improve overall Level of Service. (Outside 6-year horizon)

Justification:
Left turn demand exceeds left turn capacity on certain legs of the intersection. Identified by staff.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

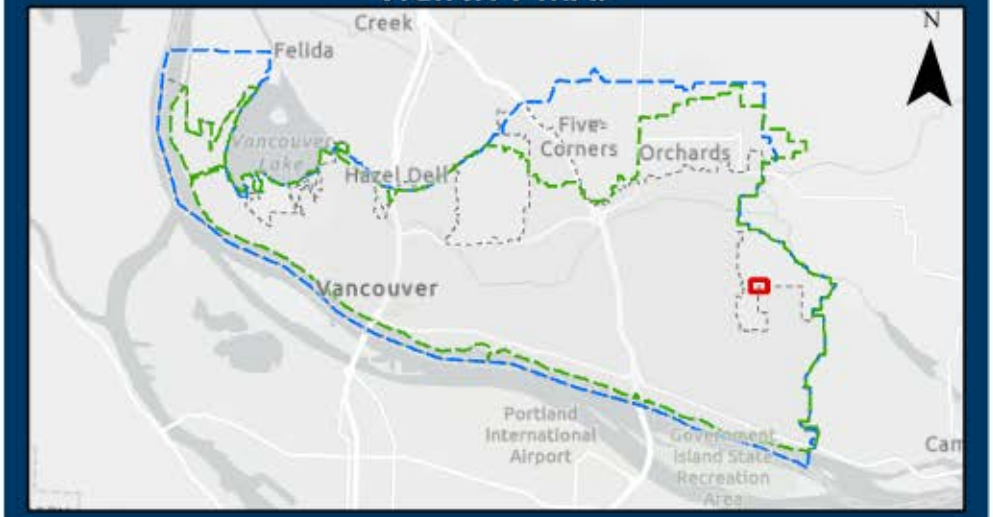
Project: Northeast 18th Street and Northeast 172nd Avenue Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install additional turn lanes and other signal improvements at the intersection of Northeast 18th Street and Northeast 172nd Avenue. (Outside 6-year horizon)

Justification:
Currently the intersection of Northeast 18th Street and Northeast 172nd Avenue is signalized, but the intersection needs additional turn lanes and signal improvements. Identified through the development review process.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

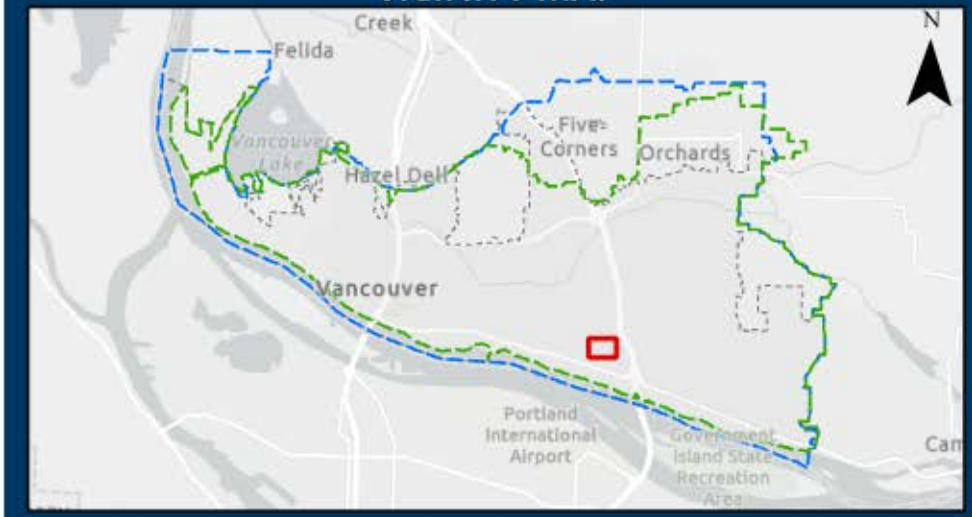
Project: Southeast 10th Street Sidewalks - Southeast 98th Avenue to Southeast Ellsworth Road

Project Extent: Southeast 98th Avenue **To:** Southeast Ellsworth Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install sidewalks and ADA ramps along Southeast 10th Street from Southeast 98th Avenue to Ellsworth Road, including on the north side between Ellsworth Road and Interstate-205. (Outside 6-year horizon)

Justification:
Sidewalks along 10th Street would improve pedestrian safety, currently there are no sidewalks. Identified by staff and public. Remaining connection on the City's major east/west active transportation network corridor with McLoughlin, MacArthur, McGillivray and Southeast 34th Street.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Sidewalk Management Program

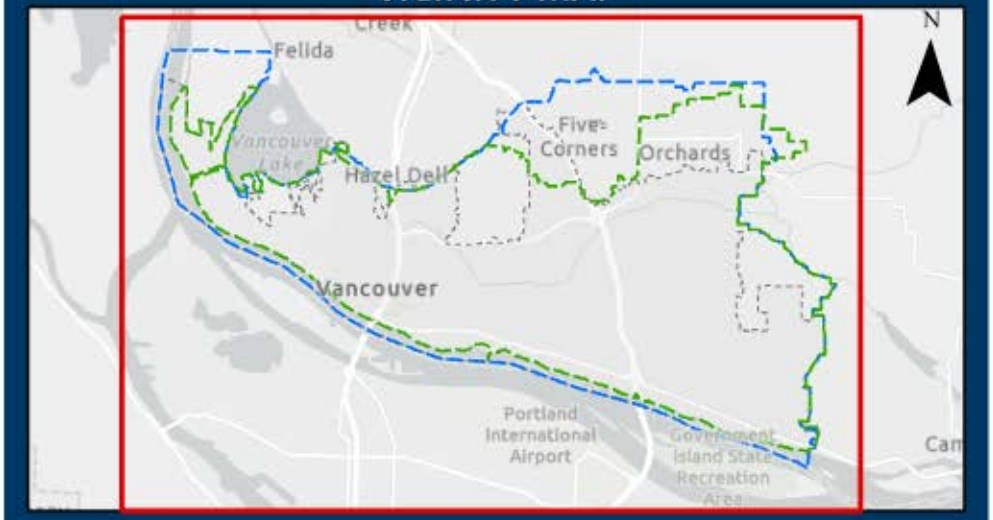
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Program manages all sidewalks and ADA curb ramps within the City limits. Includes notification and assistance to land owners to correct sidewalk and ADA curb ramp deficiencies along their property frontage. Program is budgeted for $500,000 per year.

Justification:
To improve how we provide safe sidewalks and manage our sidewalk inventory.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRG0138

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

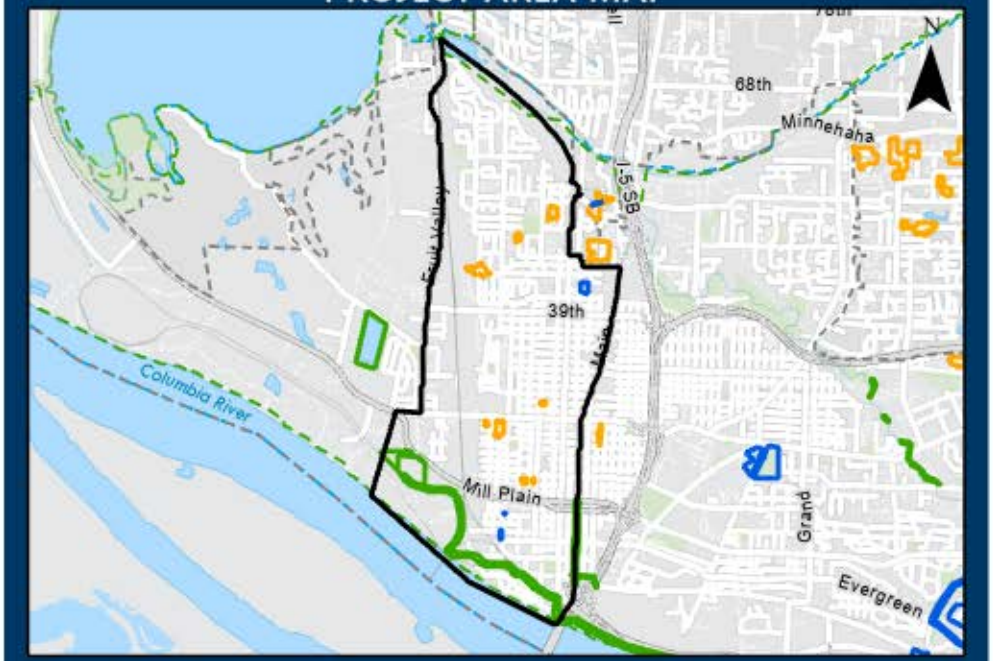
2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Westside Bike Mobility

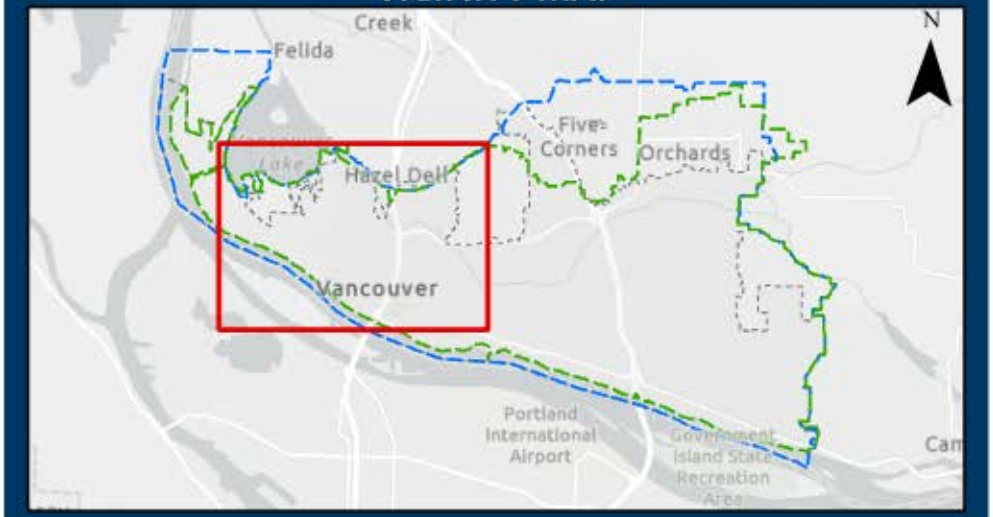
Project Extent:

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
First phase of implementation was focused on the Columbia corridor, completed in 2022. Project recommendations from the planning study included traffic calming, mobility lanes and pedestrian improvements throughout the westside of downtown Vancouver. Implementation of other routes will occur as funding allows. (Outside 6-year horizon)

Justification:
The Westside Bike Mobility study recommended multiple bicycle enhancements in the downtown area.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $5,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

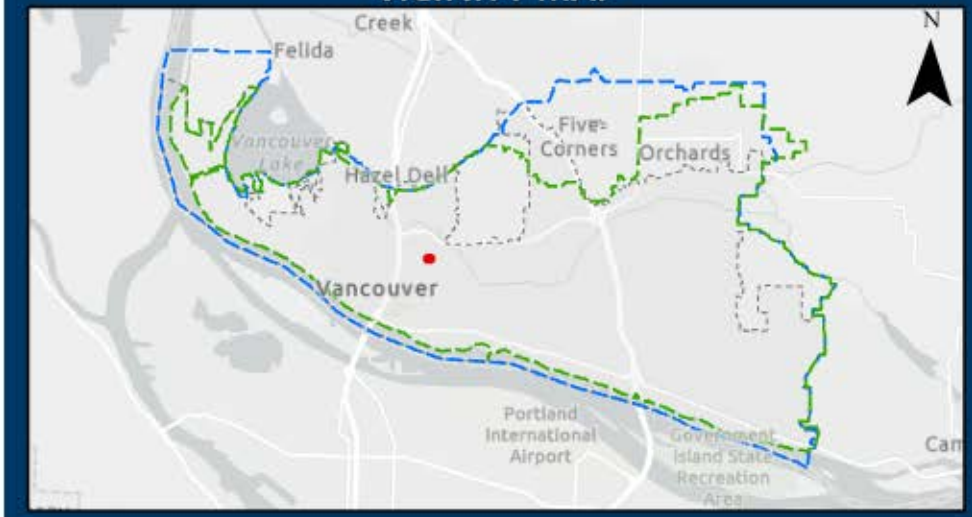
Project: Saint Johns Boulevard and Fort Vancouver Way Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install enhanced stop control at Saint Johns Boulevard and Fort Vancouver Way as well as associated civil roadway improvements. (Outside 6-year horizon)

Justification:
Intersection needs modifications in order to accommodate current and future traffic volumes and improve safety for all modes. Identified through the development review process with concept designs recommended and developed in the Saint Johns/Saint James Safety and Mobility Project.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Citywide Street Light Program

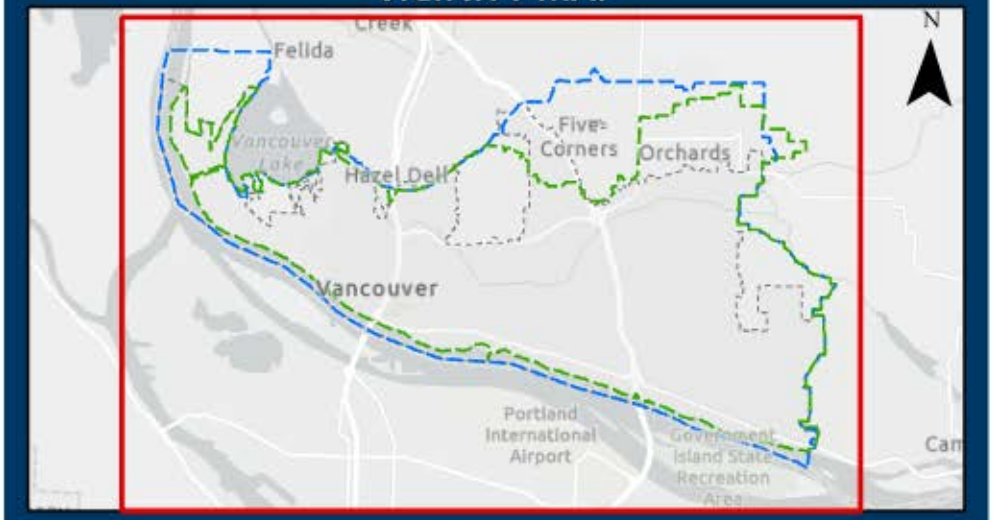
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
Program to install new street lights, including all fixtures and power, and replace old street lights citywide. This program is different than TRANS-853 which is intended to upgrade bulbs only.

Justification:
Needed program to install new street lights and replace old street lights citywide.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100786

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

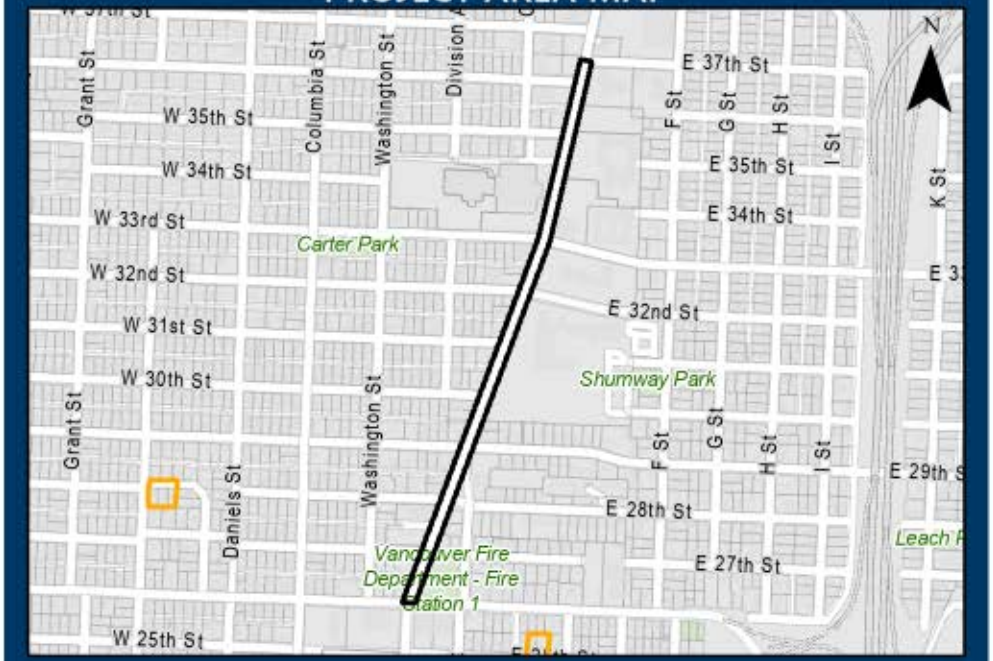
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

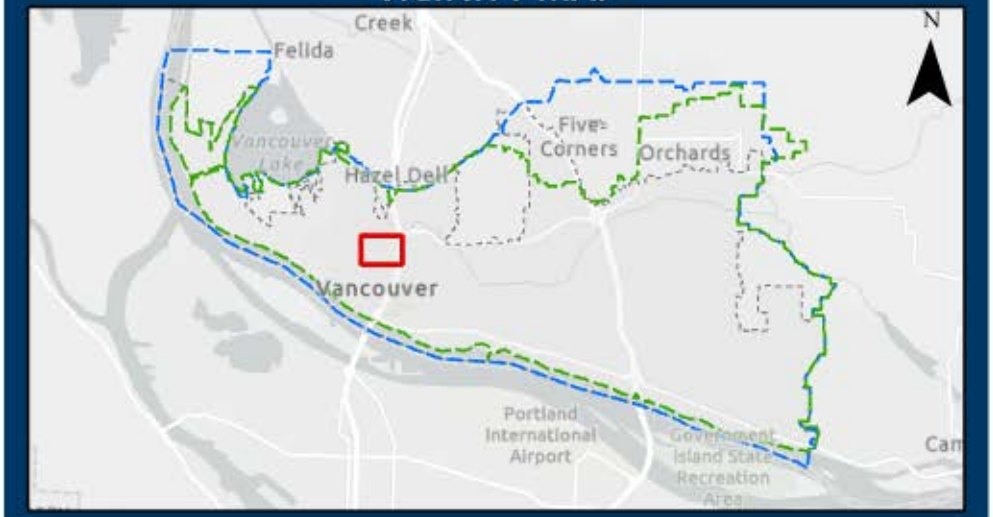
Project: Upper Main Street Complete Street and Paving Project - Fourth Plain Boulevard to East 37th Street

Project Extent: Fourth Plain Boulevard **To:** East 37th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The Upper Main Street Complete Street Project between Fourth Plain Boulevard to 37th Street will restripe to improve traffic flow. Strategic improvements are incorporated throughout the length of the project and they include: new marked crossings with median islands at 31st and 35th Streets, removal of a northbound travel lane, wayfinding signage and speed limit reduction from 30 to 25 mile per hour. Improvements to be coordinated with C-TRAN Highway 99 BRT project.

Justification:
Improving safety, mobility, and providing additional modal choices for road users. Identifed by staff and recommended by the Transportation and Mobility Commission.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

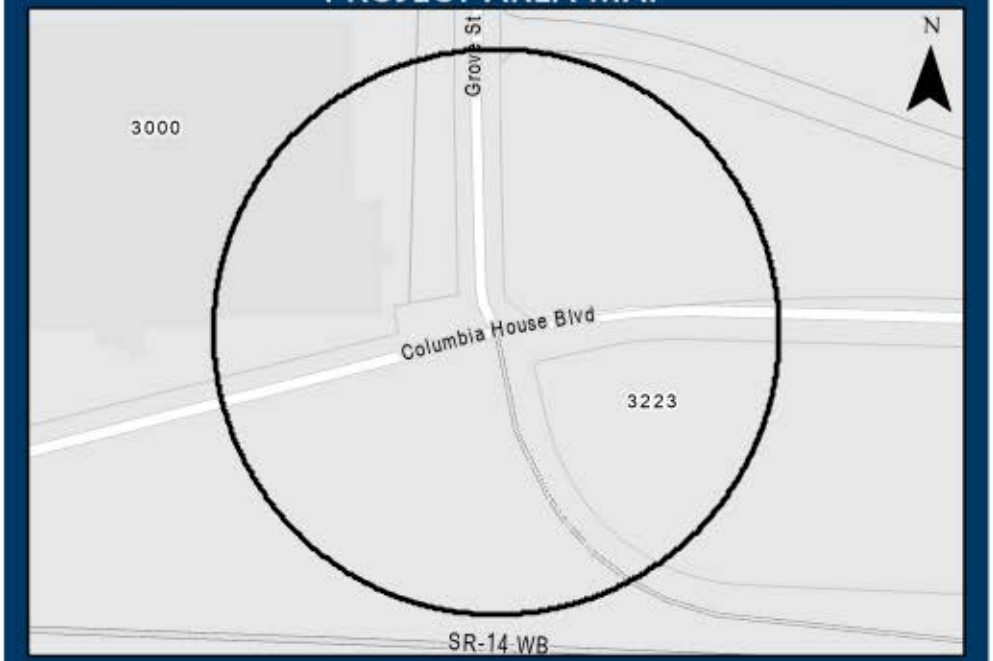
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

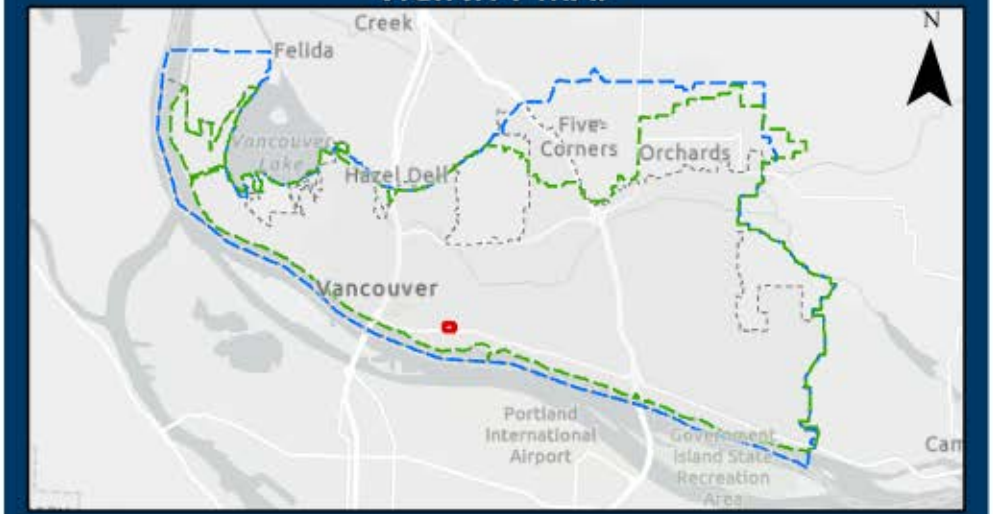
Project: Columbia House Boulevard and Grove Street Signal Upgrade

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
This project will add a dedicated northbound right-turn lane on the westbound off-ramp; and add a second westbound through lane. Reconstruct ADA ramps and move signal poles as necessary. Striping and signalization changes as necessary. Funded by proportionate share program.

Justification:
Improvements are necessary to mitigate future localized development impact identified by developer's traffic study. Identified through the development review process.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100352

Grant Funded: No

Grant Amount: $

Total Project Cost: $658,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

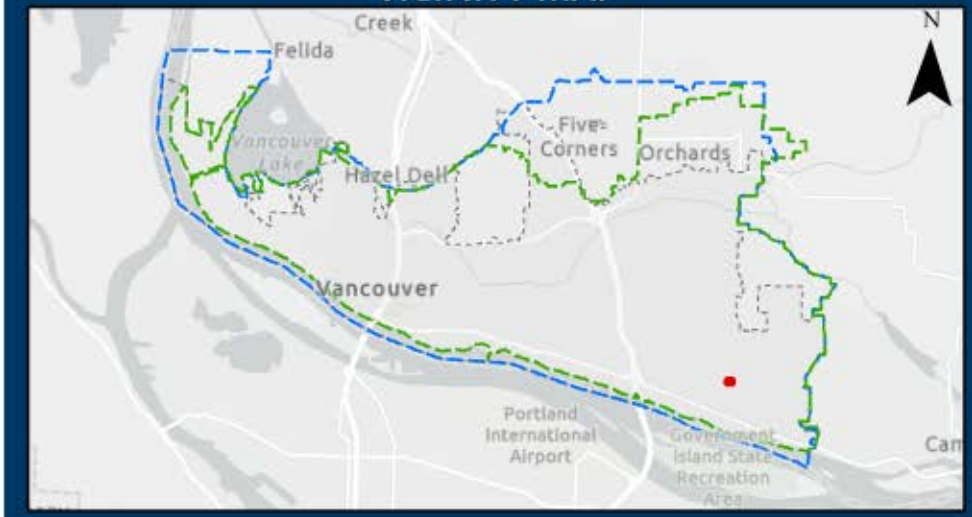
Project: McGillivray Boulevard and Village Loop Drive Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New stop controlled device at intersection. Conduct signal warrant and analysis to determine stop control device (roundabout or signal).

Justification:
The all-way stop controlled intersection is experiencing long vehicle delays during the peak hours and needs safety improvements for active transportation users. Identified through the development review process and recommended as part of the McGillivray Boulevard Safety and Mobility Project (2024).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

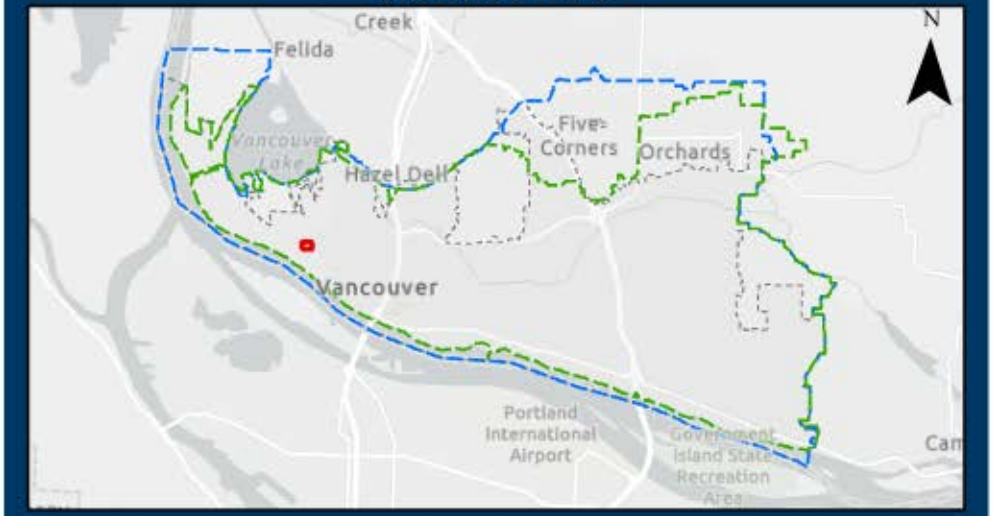
Project: Northwest 32nd Avenue and Lower River Road Roundabout

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Phase 2 of the Northwest 32nd Avenue Freight Access project proposes a roundabout at the intersection of State Route-501 and Northwest 32nd Avenue to improve traffic operations. (Outside 6-year horizon)

Justification:
Substandard roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

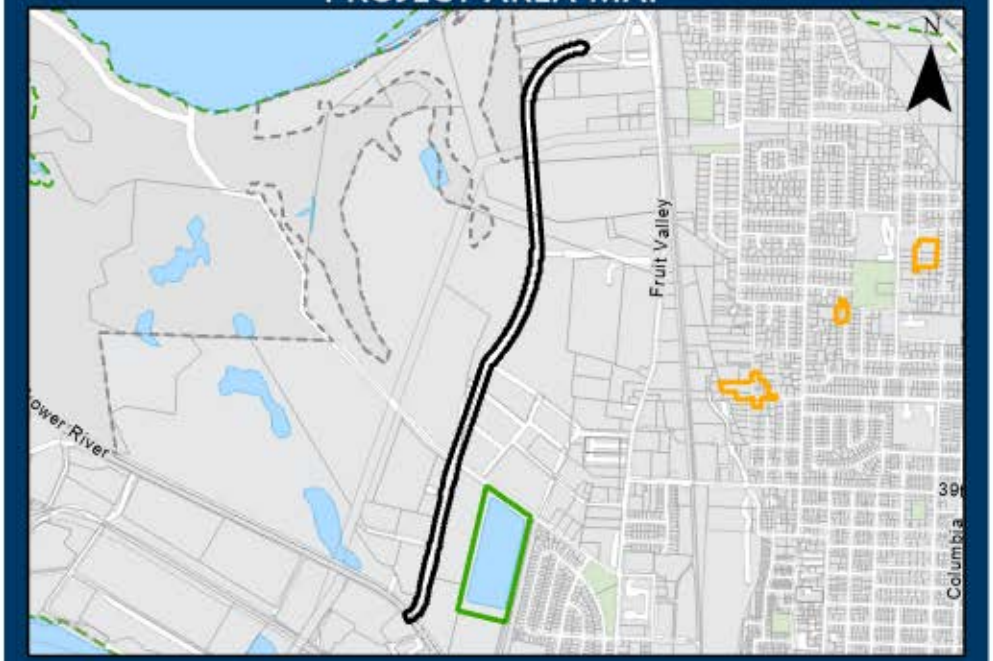
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

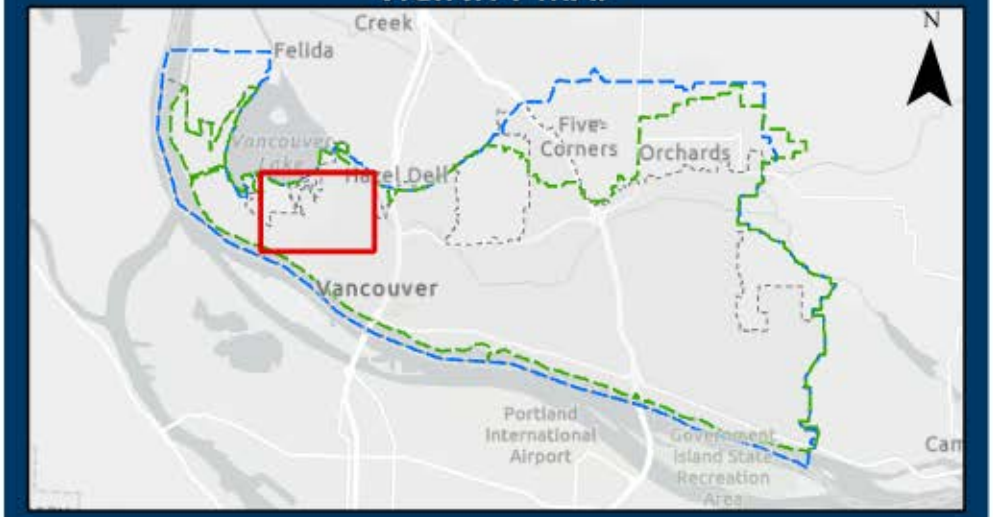
Project: Northwest 32nd Avenue Freight and Mobility - Lower River Road to Northwest 61st Street

Project Extent: State Route-501 **To:** NW 61st Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Phase 5 of the Northwest 32nd Avenue Freight Access project proposes a new segment that will consist of three travel lanes, mobility lanes, planter strips and ADA accessible sidewalks. The sidewalk along the west side of the roadway is 10 feet wide to accommodate a multi-use path facility. (Outside 6-year horizon)

Justification:
Substandard Roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: PRJ100717

Grant Funded: No

Grant Amount: $

Total Project Cost: $64,000,000

Start of Const. (year): Unknown

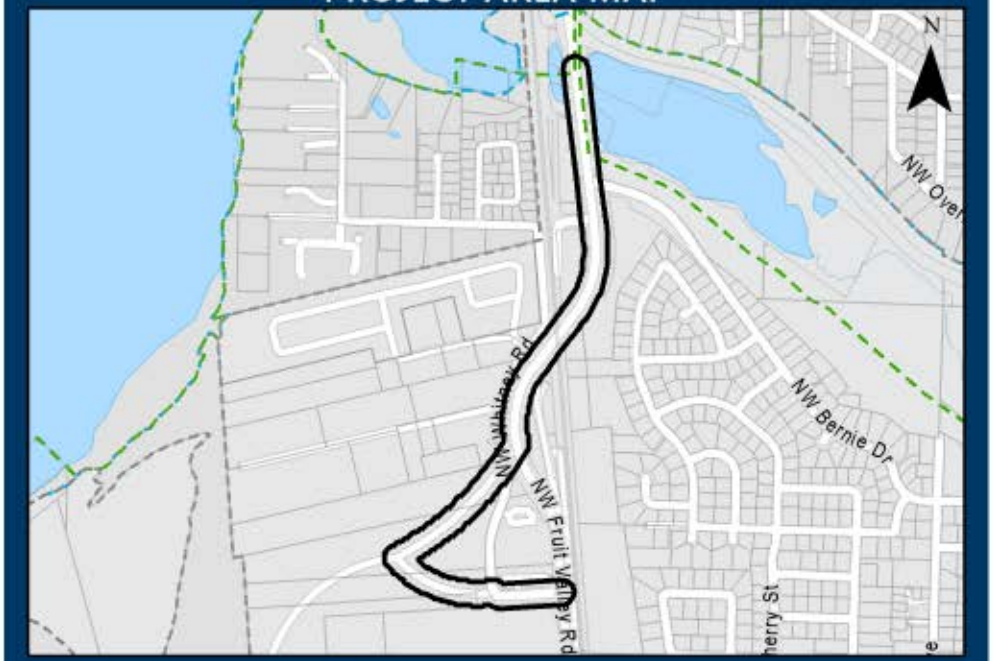
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

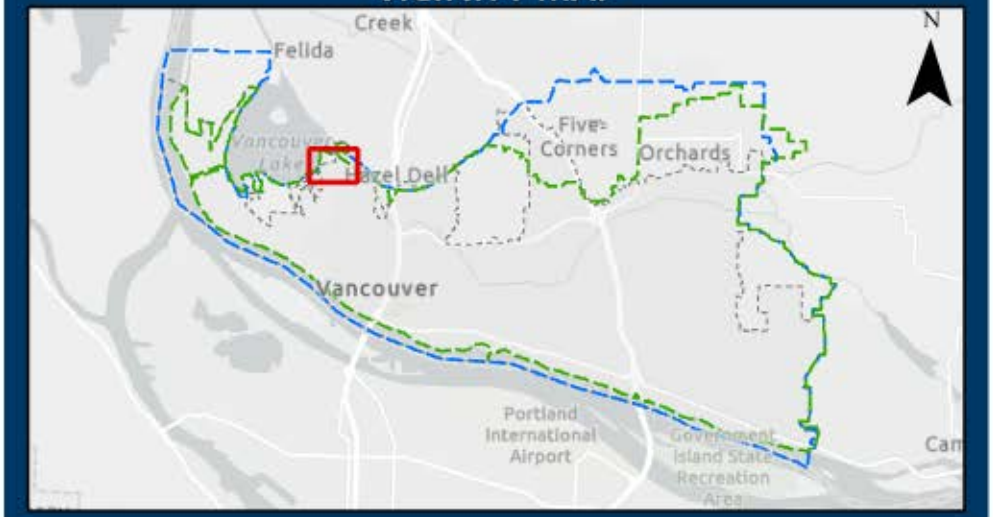
Project: Northwest 32nd Avenue Freight and Mobility - Northwest 61st Street to Burnt Bridge Creek

Project Extent: Northwest 61st Street **To:** Burnt Bridge Creek

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Phase 4 of the Northwest 32nd Avenue Freight Access project proposes rebuilding Lakeshore Avenue/Fruit Valley Road and the existing bridge over the BNSF right-of-way. The cross section will consist of three travel lanes, mobility lanes, planter strips and ADA accessible sidewalks. The sidewalk along the west side of the roadway is 10 feet wide to accommodate a multi-use path facility. (Outside 6-year horizon)

Justification:
Substandard roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $49,000,000

Start of Const. (year): Unknown

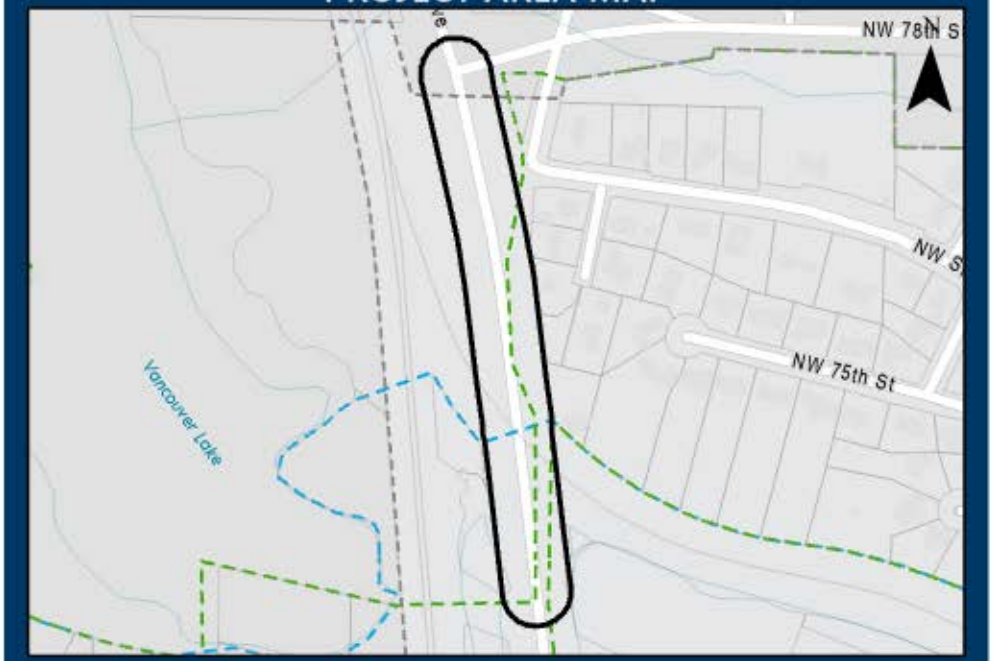
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

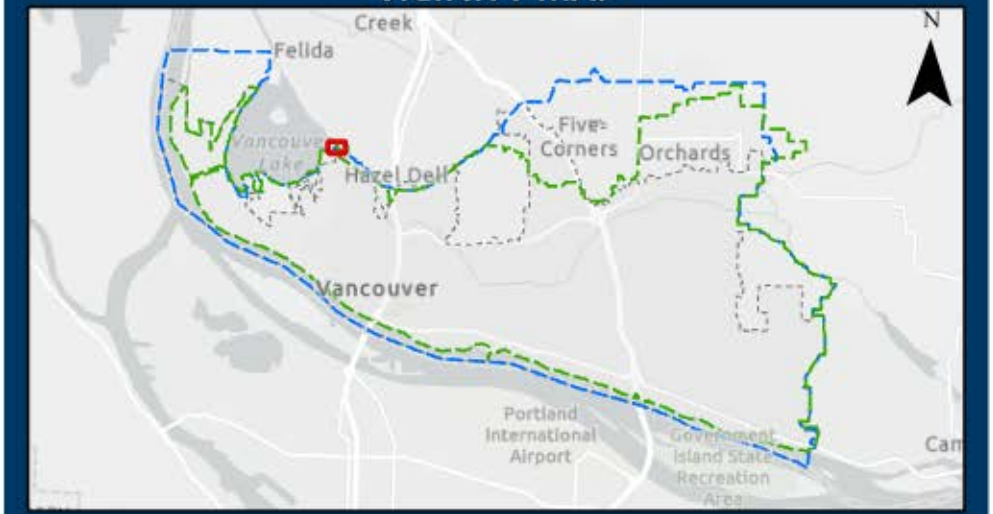
Project: Northwest 32nd Avenue Freight and Mobility - Burnt Bridge Creek to Northwest 78th Street

Project Extent: Burnt Bridge Creek **To:** Northwest 78th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Phase 3 of the Northwest 32nd Avenue Freight Access project proposes rebuilding Lakeshore Avenue/Fruit Valley Road to a cross section consisting of three travel lanes, mobility lanes, planter strips and ADA accessible sidewalks. The sidewalk along the west side of the roadway is 10 feet wide to accommodate a multi-use path facility. (Outside 6-year horizon)

Justification:
Substandard Roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

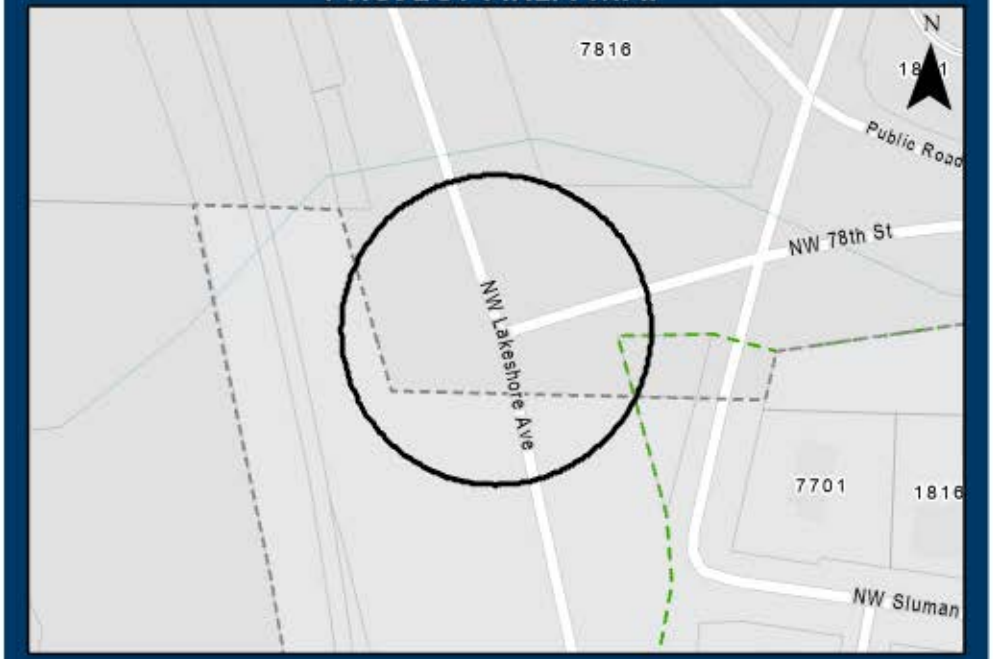
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

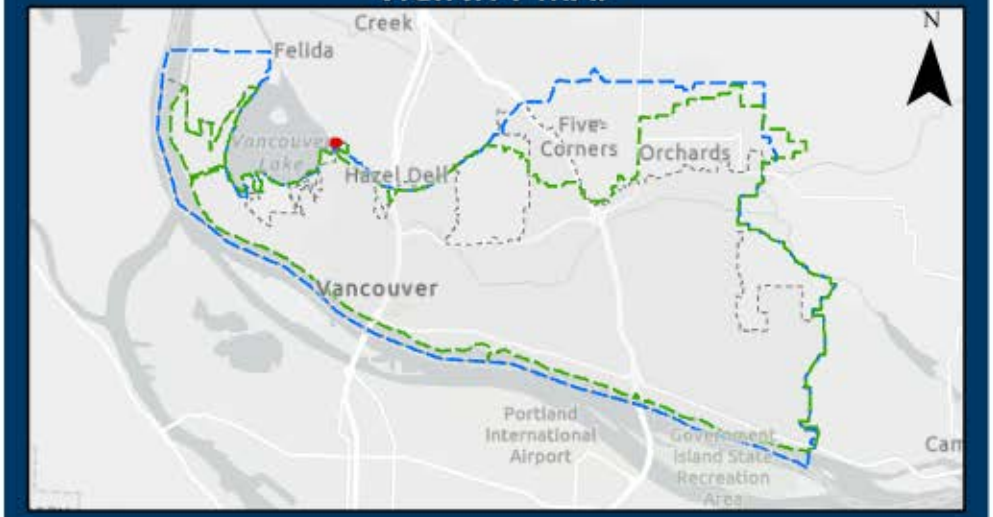
Project: Fruit Valley and Lakeshore Avenue Roundabout

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Phase 1 of the Northwest 32nd Avenue Freight Access project proposes a new roundabout to improve traffic operations at the intersection of Northwest Lakeshore Avenue, Northwest 78th Street, and Fruit Valley Road.

Justification:
Substandard Roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).

Priority Score:
Long-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100787

Grant Funded: No

Grant Amount: $

Total Project Cost: $5,236,000

Start of Const. (year): Unknown

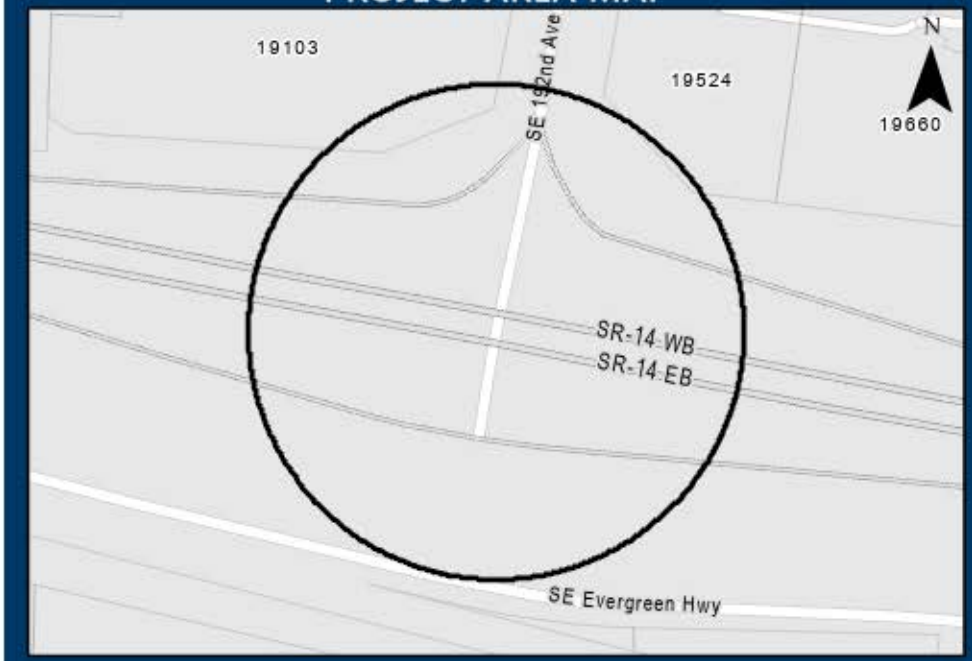
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

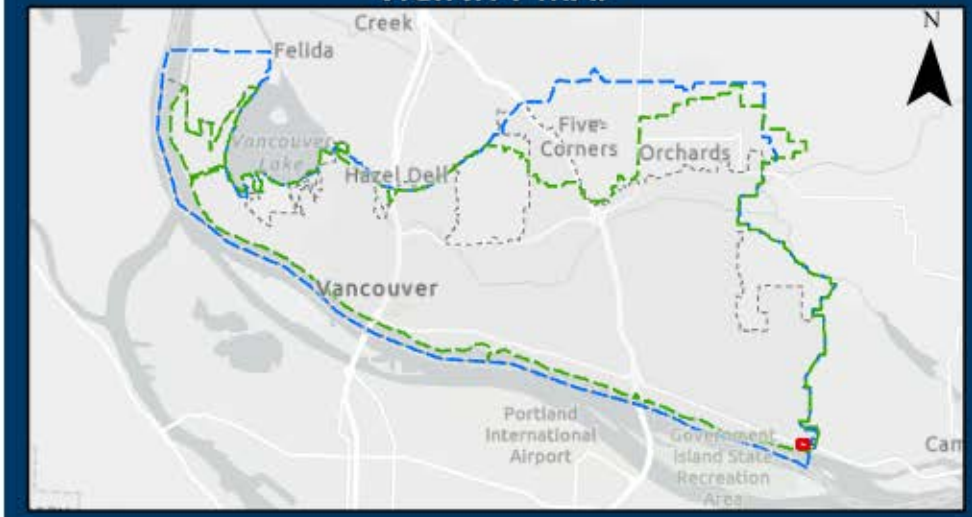
Project: 192nd Avenue On-Ramp to State Route-14 Signal

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Install a new traffic signal, on the westbound on-ramp from Southeast 192nd Avenue to State Route-14. Partially funded by Proportionate Share money.

Justification:
This signal is needed to improve safety and Level of Service. Improvements triggered by proposed development in the area including the Columbia Palisades development.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100443

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,016,000

Start of Const. (year): 2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

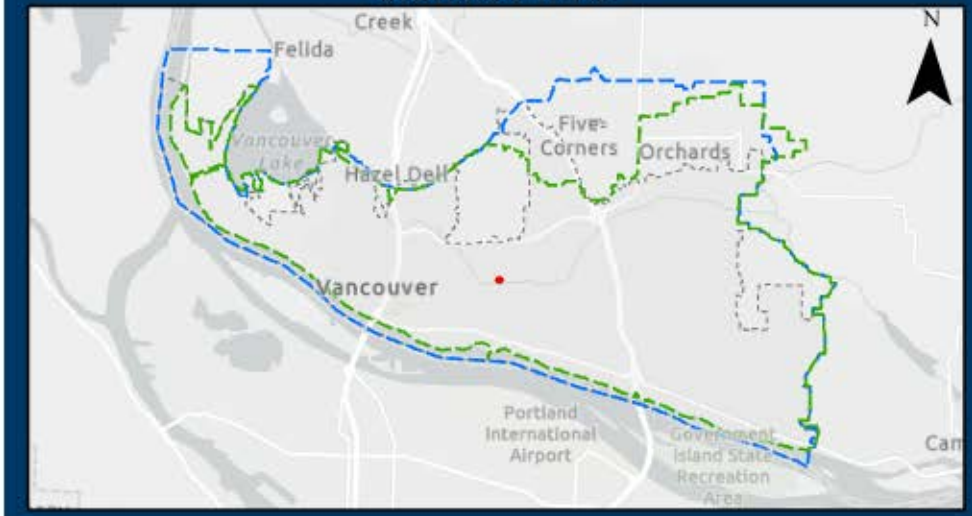
Project: Northeast 18th and Devine Pedestrian Improvements (SS4A)

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Project improvements for improved ADA access at the intersection of Northest 18th Street and Devine Road. Funded through TRANS-844 - Multimodal Safety and Accessibility.

Justification:
Originated from Fourth Plain Corridor Subarea Plan (2007) and included in the City's USDOT Safe Streets and Roads for All grant package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100592

Grant Funded: No

Grant Amount: $

Total Project Cost: $550,000

Start of Const. (year): 2026

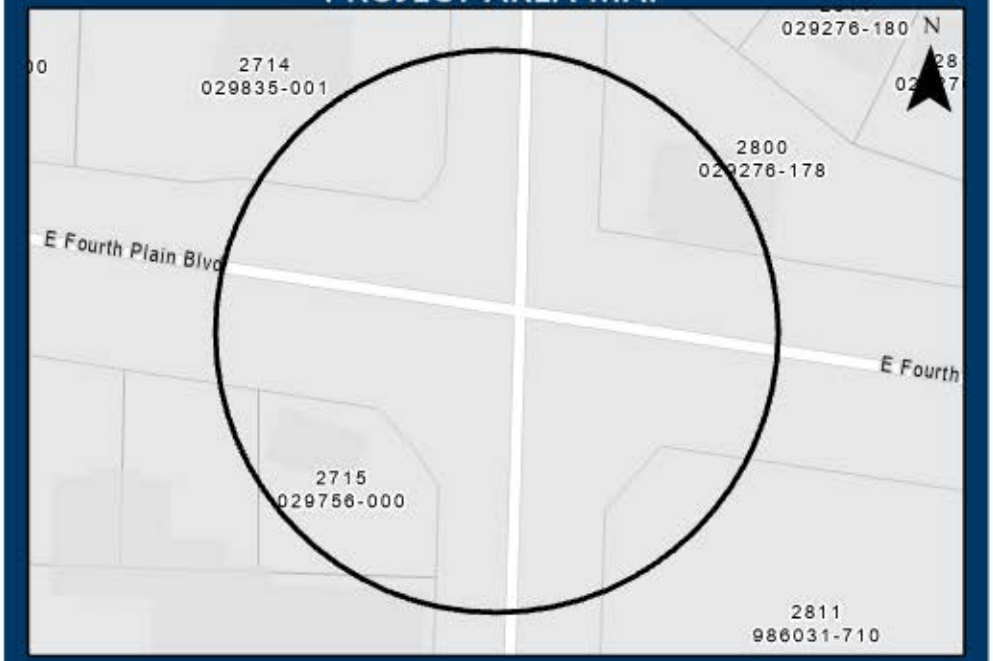
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

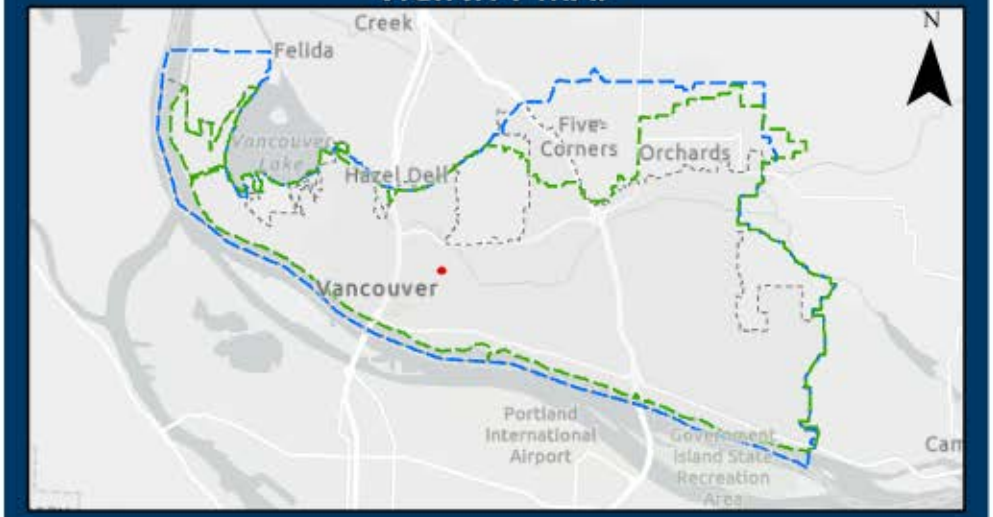
Project: Northeast Fourth Plain Boulevard and Grand Boulevard - Pedestrian Improvement Southwest Corner

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Increase radius of southwest corner to improve pedestrian safety and ADA access, and accommodate truck turns. Project requested by City of Vancouver Traffic Engineering. (Outside 6-year horizon)

Justification:
To improve pedestrian safety at this corner, for pedestrian movement and sight distance for safe crossing both eastward and northward. Originated from Fourth Plain Corridor Subarea Plan (2007) and Fourth Plain Forward Action Plan (2015).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $700,000

Start of Const. (year): Unknown

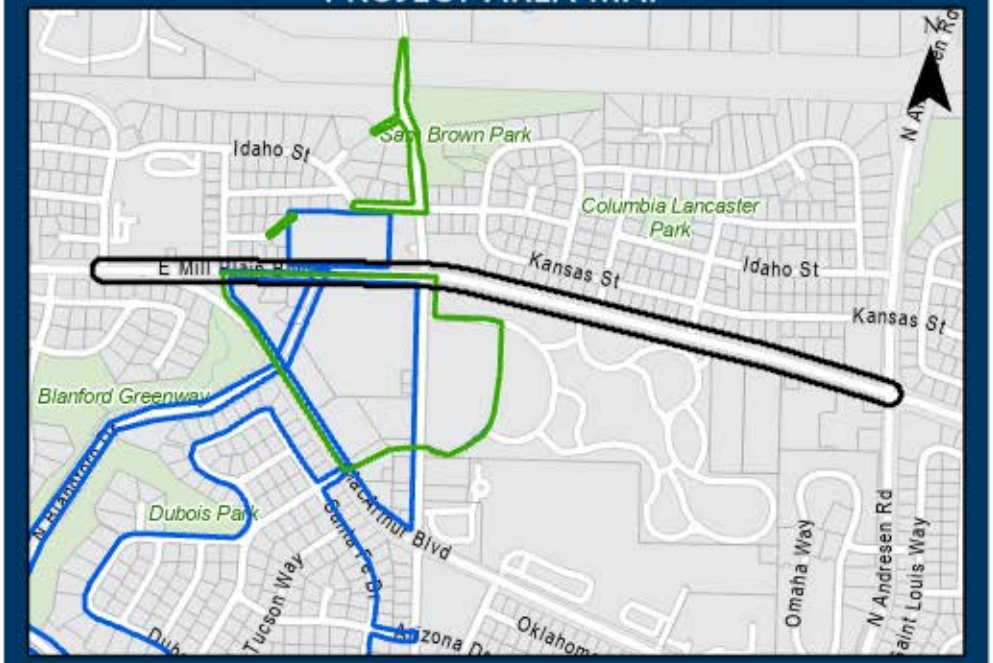
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

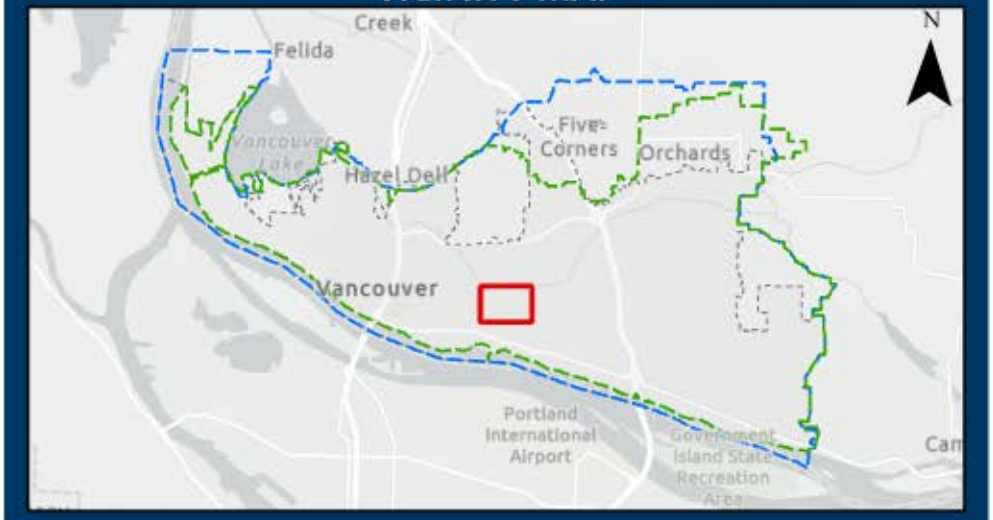
Project: East Mill Plain Boulevard - Boise Avenue to North Andresen Road

Project Extent: Boise Avenue **To:** North Andresen Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Heights District Plan recommended roadway changes to improve safety, support multimodal mobility and accommodate future Bus Rapid Transit line. Includes reducing lane widths, adding protected mobility lanes, improving sidewalks, adding planter strips, and adding and/or improving ADA access and pedestrian crossings at Ogden, Missoula and Helena.

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

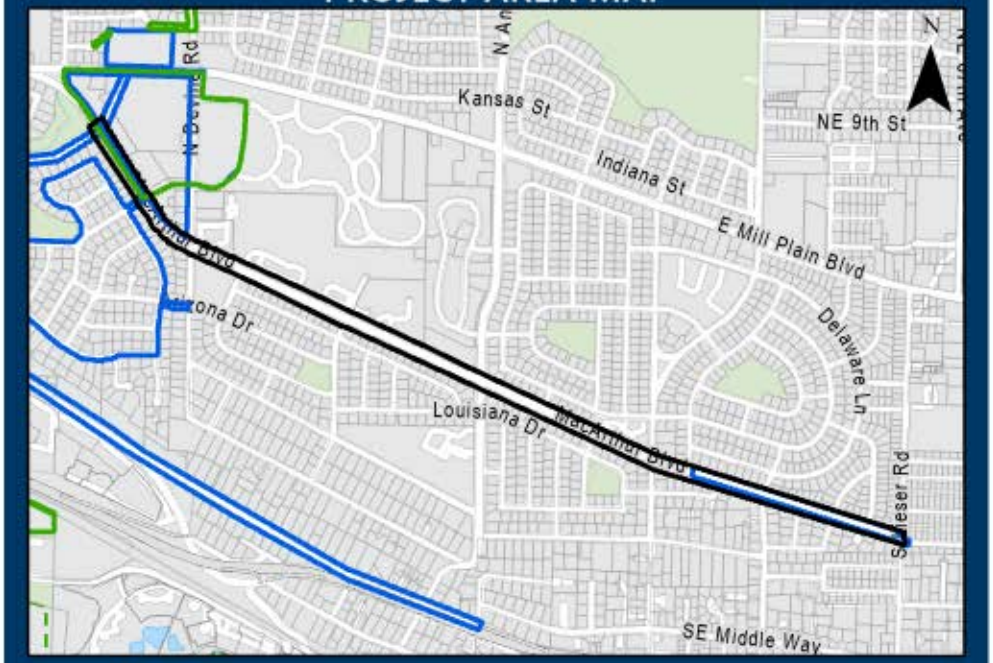
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

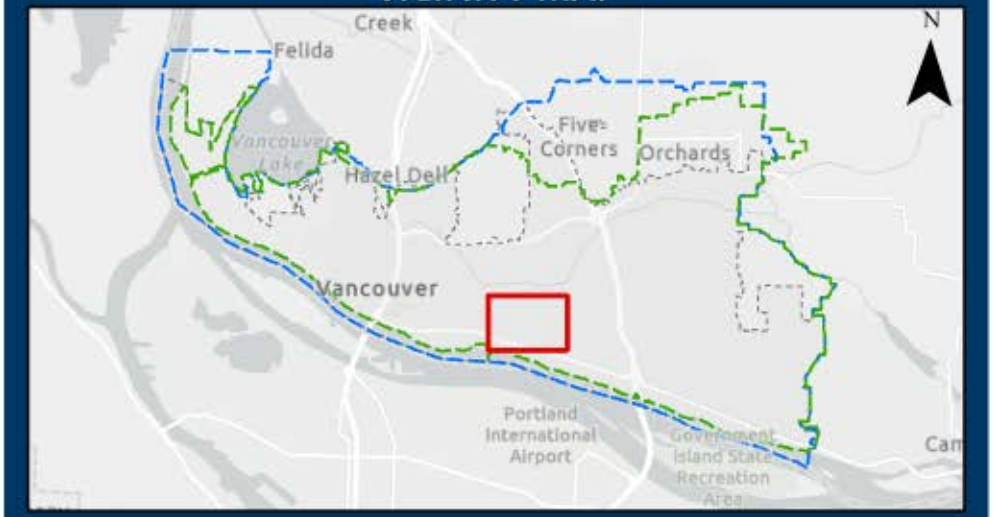
Project: MacArthur Boulevard - Blandford Drive to Lieser Road

Project Extent: Blandford Drive **To:** Lieser Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Heights District Plan recommended roadway changes to improve safety, support multi-modal mobility, and add a linear greenbelt. Includes moving vehicle travel to the east side of the median and converting the west side to separated mobility lanes and pedestrian facilities, and open space. Will include improved ADA access and pedestrian crossings at Blanford, Phoenix, Texas and Burdick. (Outside 6-year horizon)

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $15,000,000

Start of Const. (year): Unknown

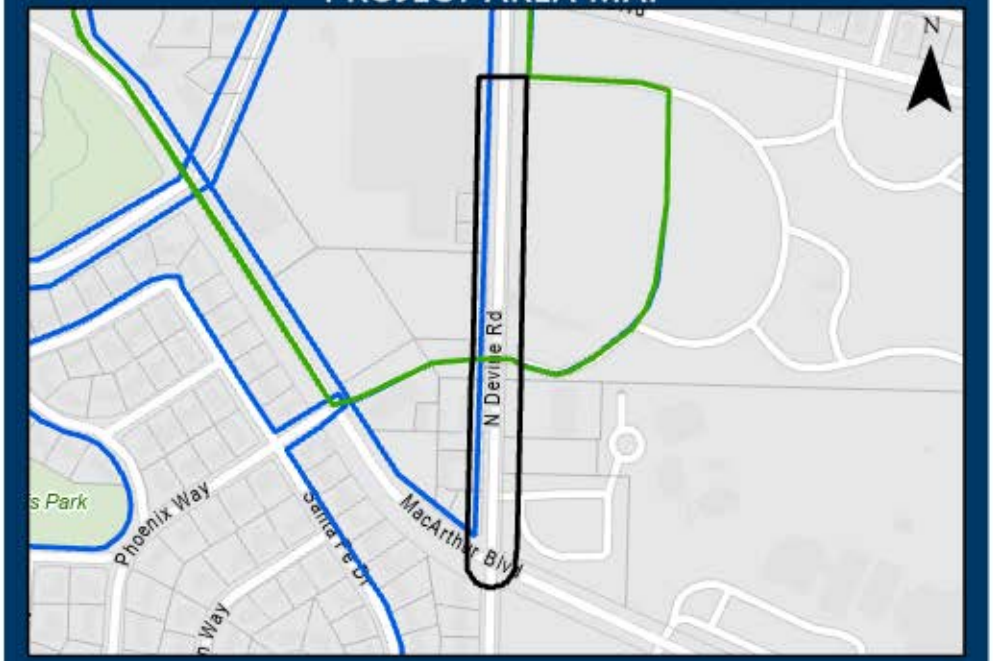
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

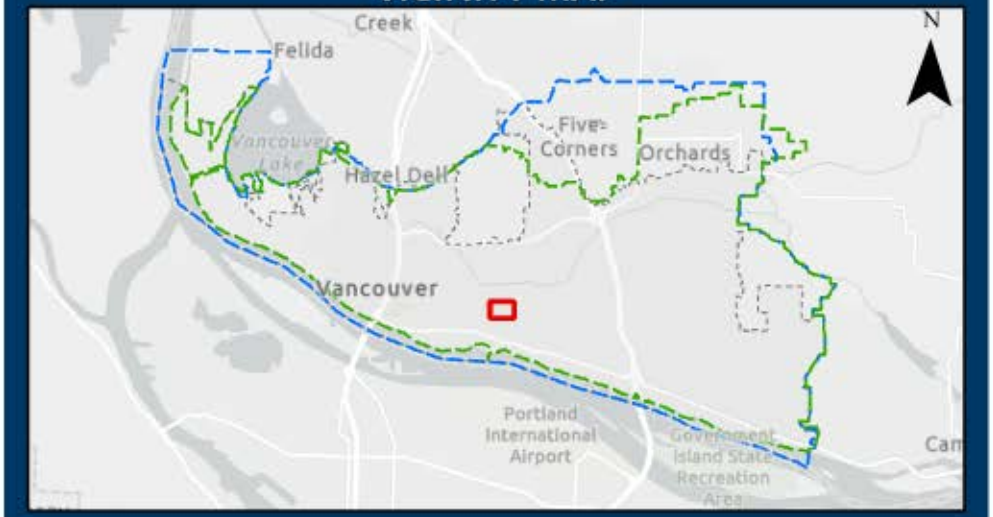
Project: North Devine Road - South of Mill Plain Boulevard to MacArthur Boulevard

Project Extent: South of Mill Plain Boulevard **To:** MacArthur Boulevard

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Heights District Plan recommended roadway changes to improve safety and support multi-modal mobility, including a two-way protected mobility lane on the west side of the street, improved ADA access and sidewalks, larger planter strips, and enhanced crossings. Sidewalk improvements along Devine being constructed as part of TRANS-871. (Outside 6-year horizon)

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $4,000,000

Start of Const. (year): Unknown

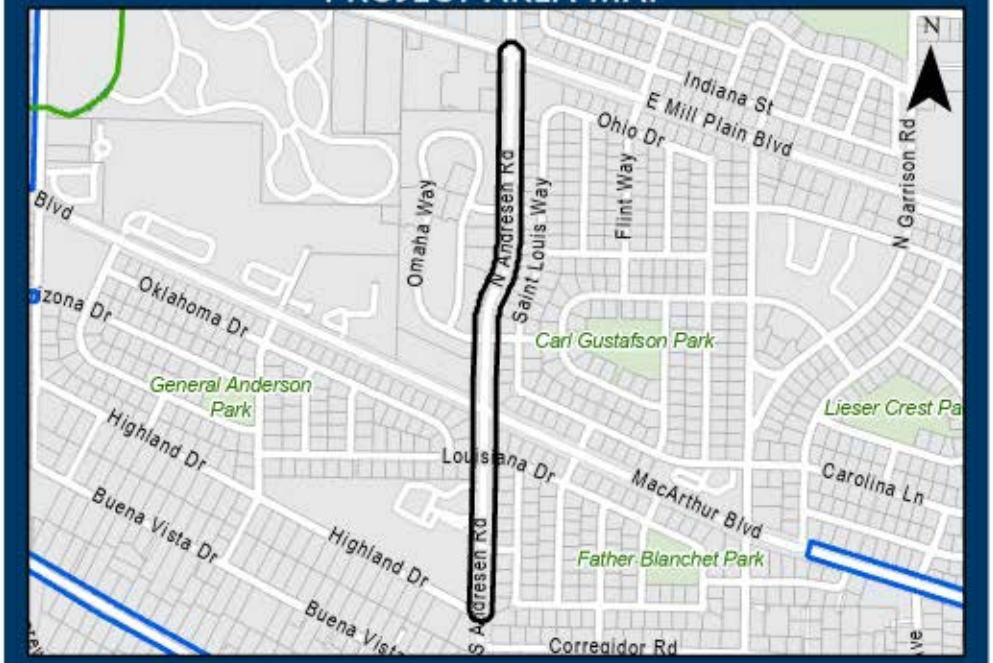
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

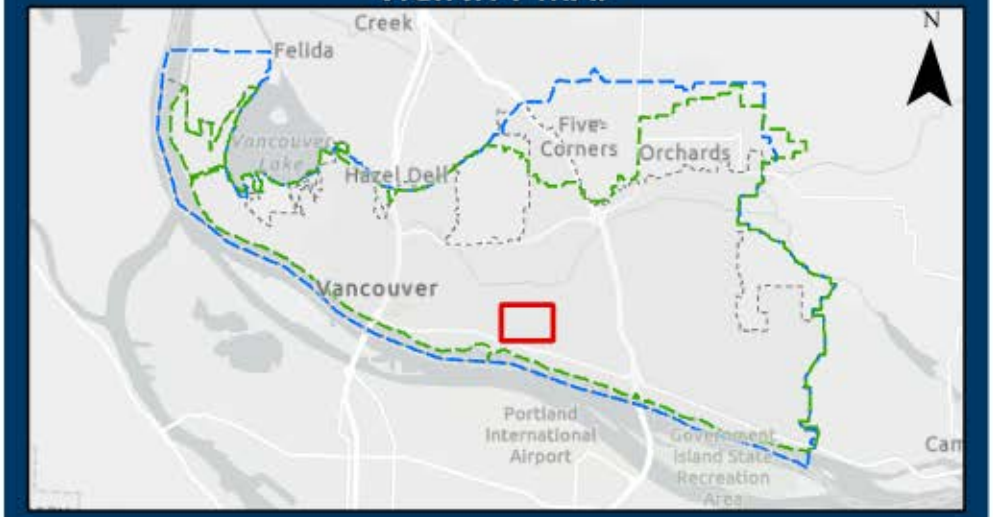
Project: Andresen Road - East Mill Plain Boulevard to Highland Drive

Project Extent: East Mill Plain Boulevard **To:** Highland Drive

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Roadway changes to improve safety and support multi-modal mobility. Includes reducing the travel lanes from four to two just south of Mill Plain, adding protected mobility lanes, widening sidewalks and adding planter strips, improving ADA access pedestrian crossings at Wichita, Missouri and Louisiana. (Outside 6-year horizon)

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

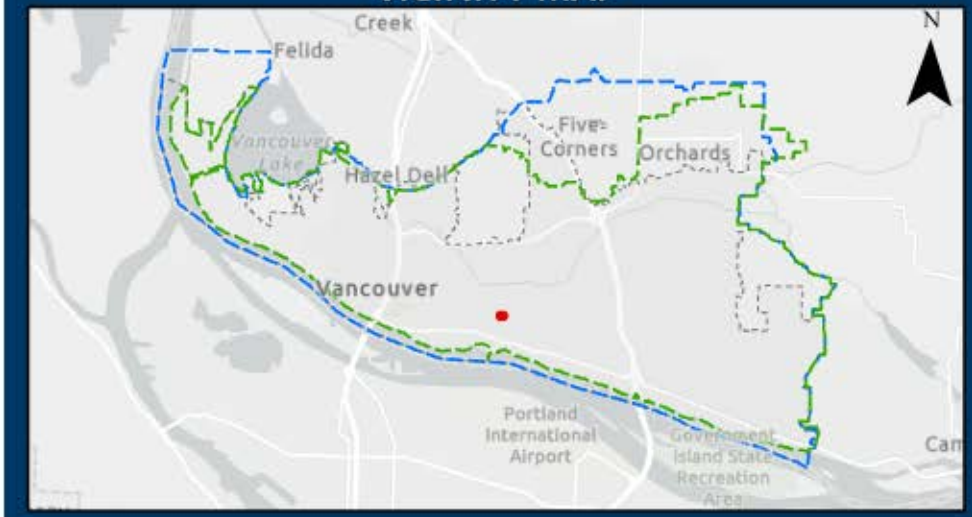
Project: MacArthur Boulevard at North Devine Road Roundabout

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Heights District Plan recommended roadway changes - Construct roundabout to optimize multimodal traffic safety and operations with additional trips generated by redevelopment in the Heights District. (Outside 6-year horizon)

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

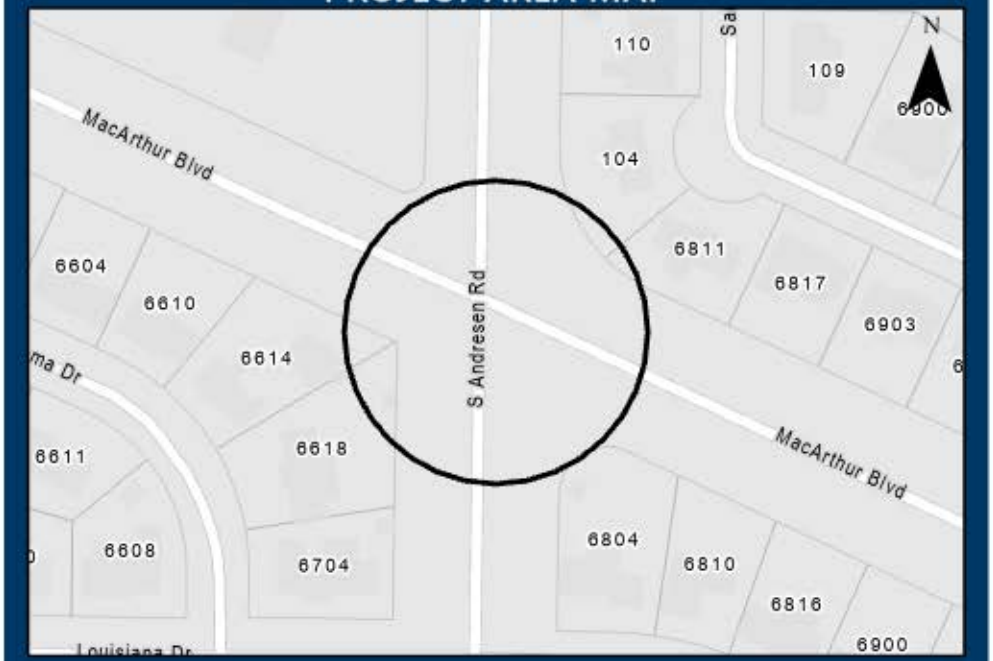
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

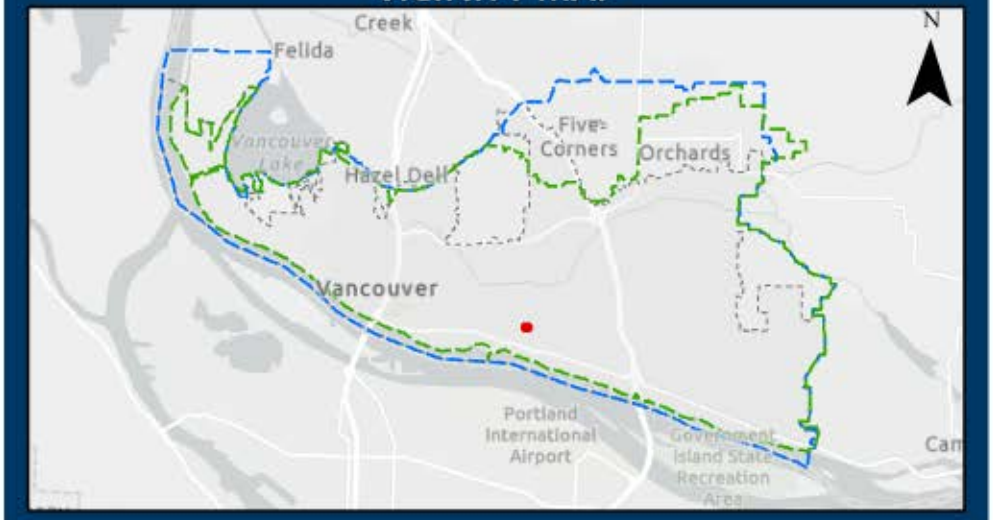
Project: MacArthur Boulevard at North Andresen Road Roundabout

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Heights District Plan recommended roadway changes. Construct roundabout to optimize multimodal traffic safety and operations with additional trips generated by redevelopment in the Heights District. (Outside 6-year horizon)

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

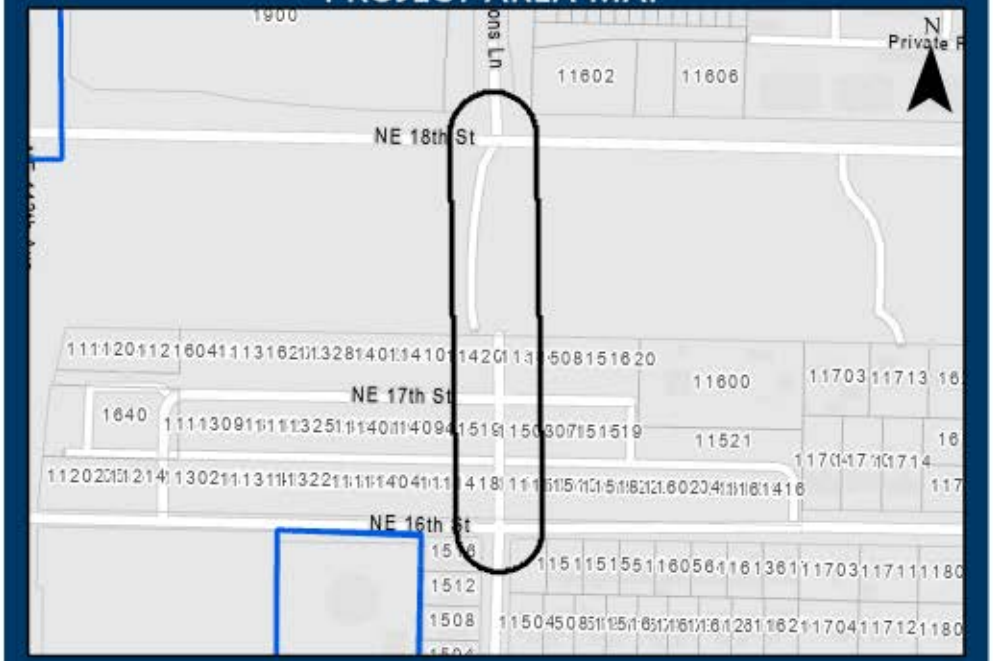
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

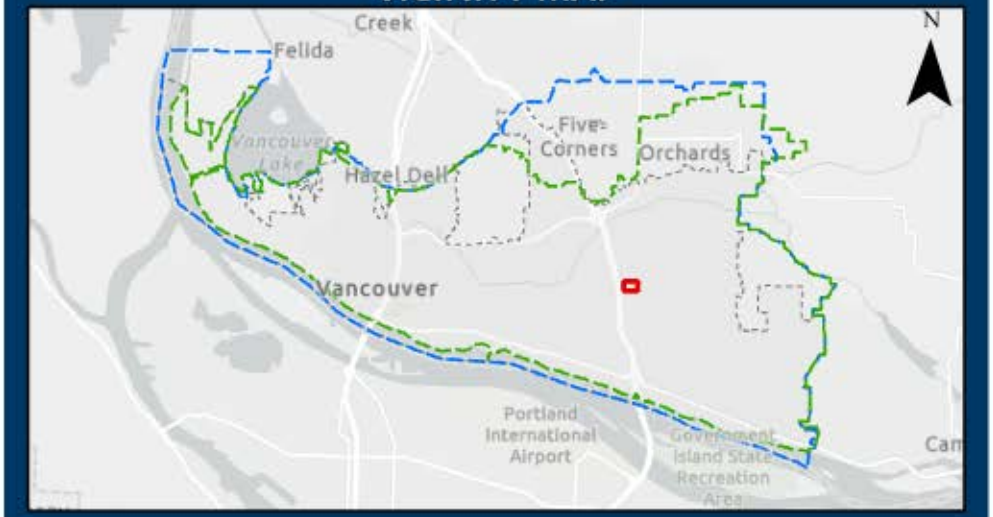
Project: Northeast 115th Avenue Extension - 16th Street to 18th Street

Project Extent: Northeast 16th Street **To:** Northeast 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Active
Funding Status:	Partially Funded

PROJECT

Description:
This project proposes a new road connecting Northeast 16th Street and Northeast 18th Street in the vicinity of Four Seasons Lane and Joe's Place Farms. This is partially funded through $250,000 developer contribution and will require ROW from Joe's Place Farms and Bonneville Power Administration.

Justification:
Complete street network connection and loop two dead end streets. Identified through the development review process.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100386

Grant Funded: No

Grant Amount: $

Total Project Cost: $970,500

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

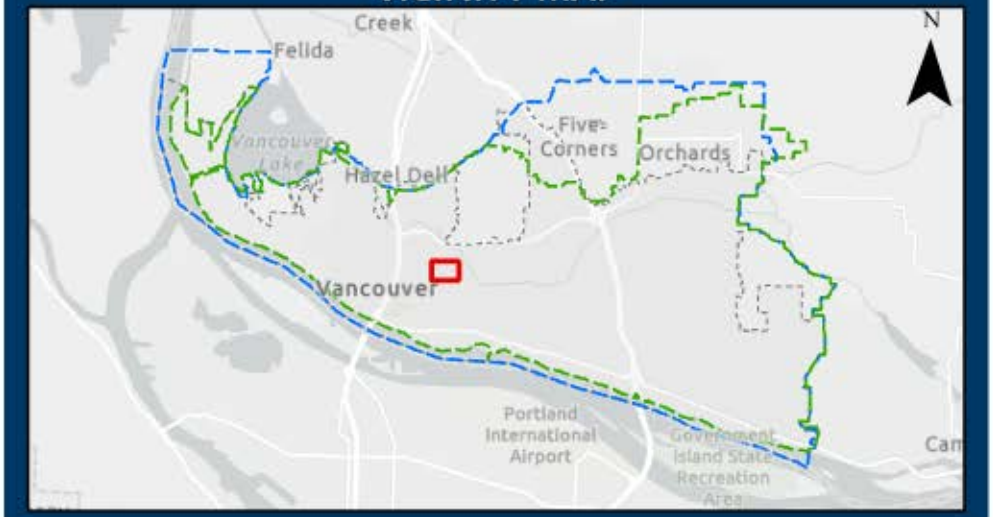
Project: Northeast Fourth Plain Boulevard - Enhanced Pedestrian Crossings (SS4A)

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Pedestrian and ADA accessible improvements on East Fourth Plain Boulevard east of Fort Vancouver Way. Improvements include a HAWK beacon and pedestrian refuges on Fourth Plain Boulevard west of Reserve Street and Fourth Plain Boulevard at Neals Lane.

Justification:
Northeast Fourth Plain enhanced pedestrian crossings to improve pedestrian safety and transit access. Originated from Fourth Plain Corridor Subarea Plan (2007), Fourth Plain Forward Action Plan (2015), Fourth Plain Pedestrian Safety and Access Implementation Strategy (2017).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number:	PRJ100672
Grant Funded:	No
Grant Amount:	$
Total Project Cost:	$770,000
Start of Const. (year):	2026

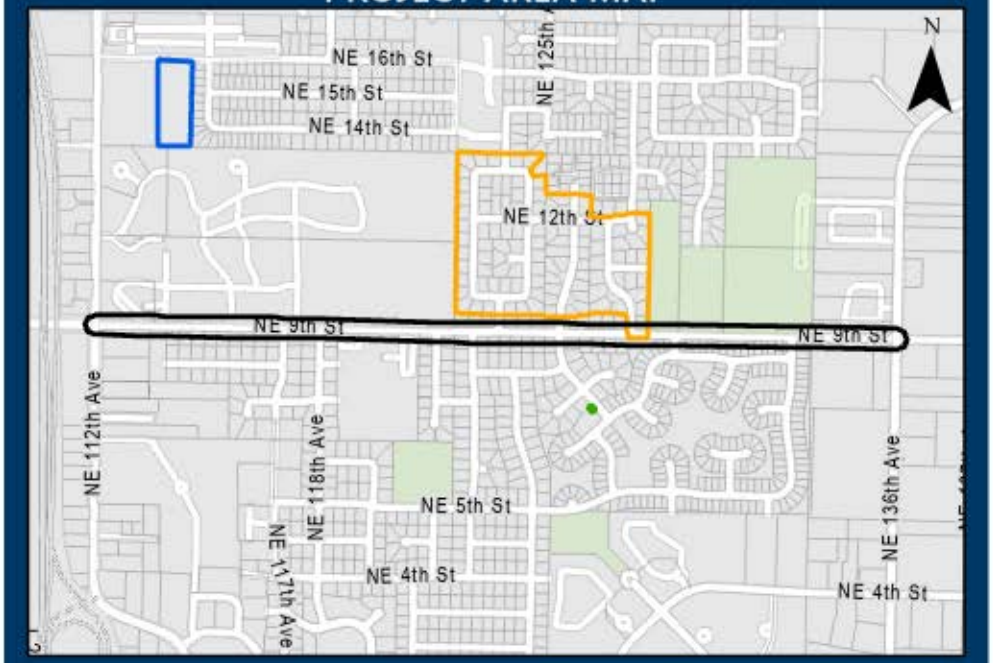
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

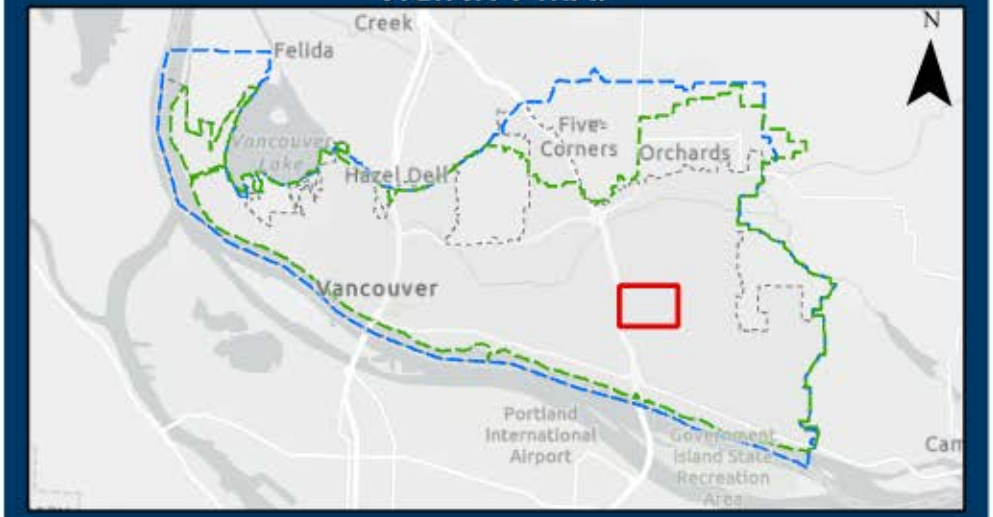
Project: Northeast 9th Street Infill Sidewalk - Northeast 112th Avenue to Northeast 136th Avenue

Project Extent: Northeast 112th Avenue **To:** Northeast 136th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This project will add new sections of sidewalk infill along Northeast 9th Street, between Northeast 112th Avenue and Northeast 136th Avenue. (Outside 6-year horizon)

Justification:
Identified through our Sidewalk Management Program.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

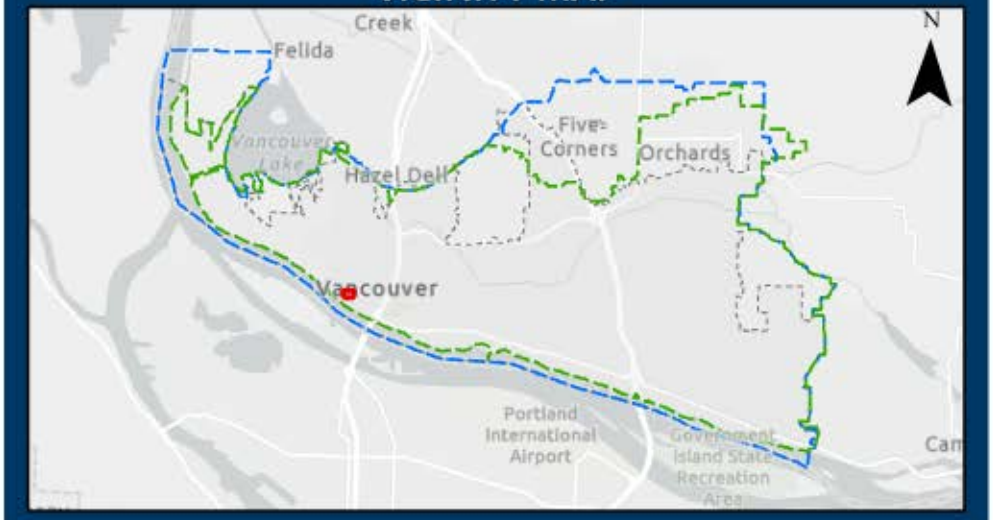
Project: Amtrak Multimodal Access - West 11th Street

Project Extent: Hill Street (Amtrak Station) **To:** King Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This project will provide multimodal mobility lanes and pedestrian access along West 11th Street from King Street to the Amtrak Station.

Justification:
Provides multi-modal access to the Amtrak Station. Originated from Vancouver City Center Vision Plan (2007).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

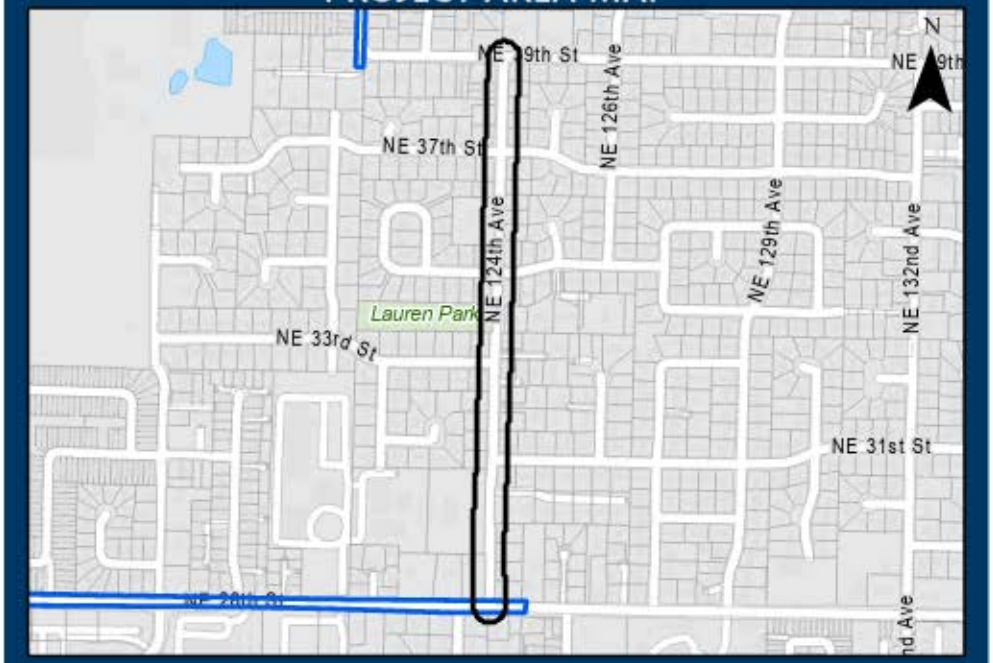
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

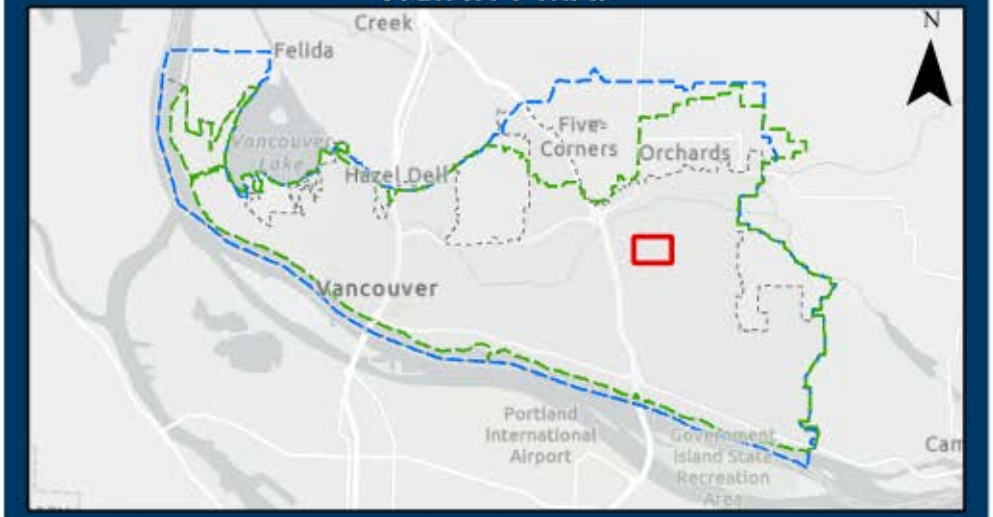
Project: Northeast 124th Avenue - Northeast 28th Street to Northeast 39th Street

Project Extent: Northeast 28th Street **To:** Northeast 39th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Reconstruction/Upgrade existing two lane Collector roadway to current standards, to include sidewalks, ADA ramps, mobility lanes and streetlights.

Justification:
Upgrade existing two lane Collector roadway to increase safety, mobility, accessiblity and level of service. Identified through the development review process.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

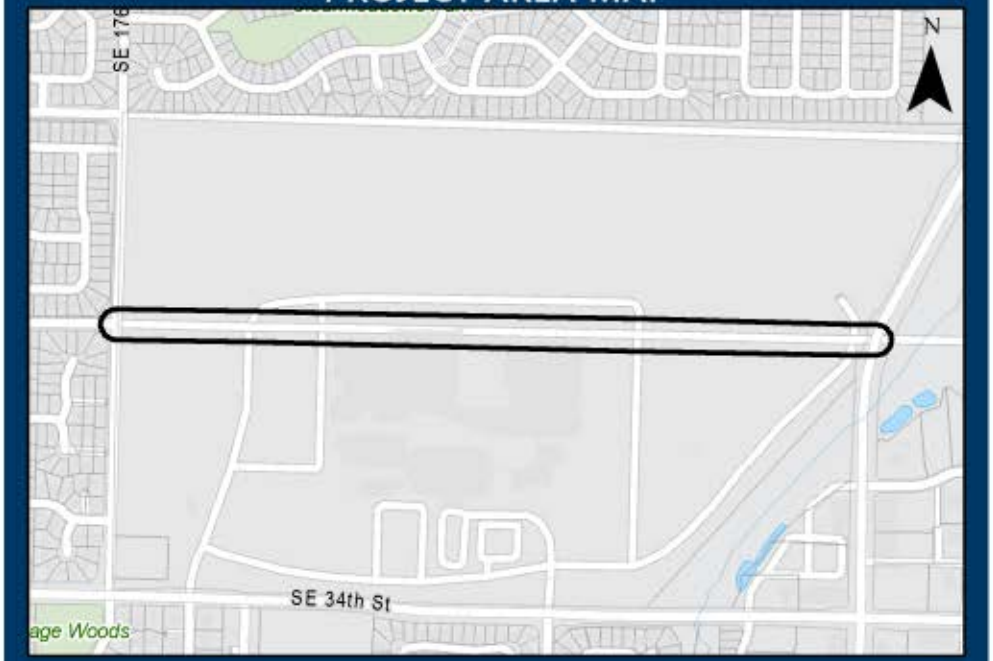
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

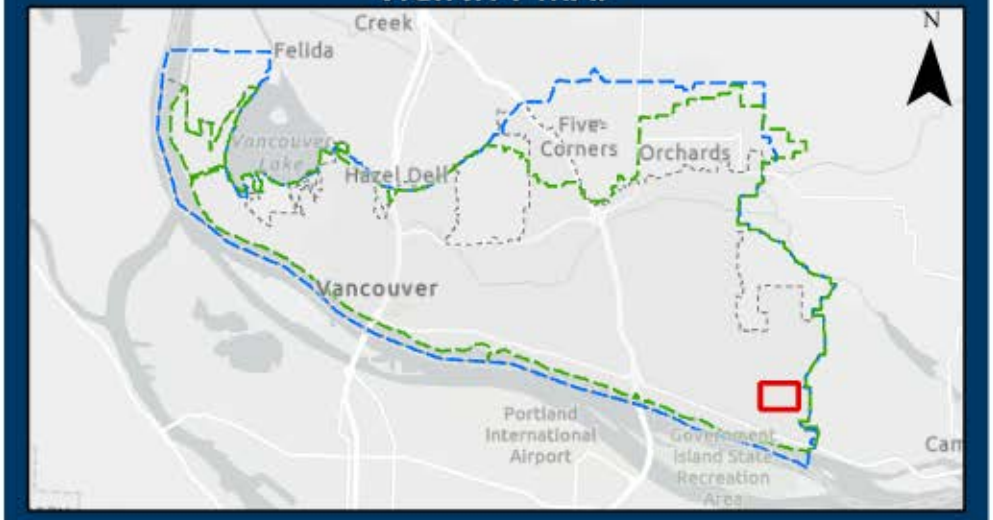
Project: Southeast 29th Street - Southeast 176th Avenue to Southeast 192nd Avenue

Project Extent: Southeast 176th Avenue **To:** Southeast 192nd Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New 3-lane road built to principal arterial standards, to improve capacity, service and safety. Improvements include 3-lane principal arterial (1 lane each direction plus turn lane) with mobility lanes, streetlights, sound walls (where required), sidewalk and ADA ramps, and shared use pathway on south side of street. Developer built through developer contributions for the Vancouver Innovation Center project. (Outside 6-year horizon)

Justification:
Long planned new east-west arterial for capacity, demand management and bike/pedestrian access inside the Vancouver Innovation Center project area.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

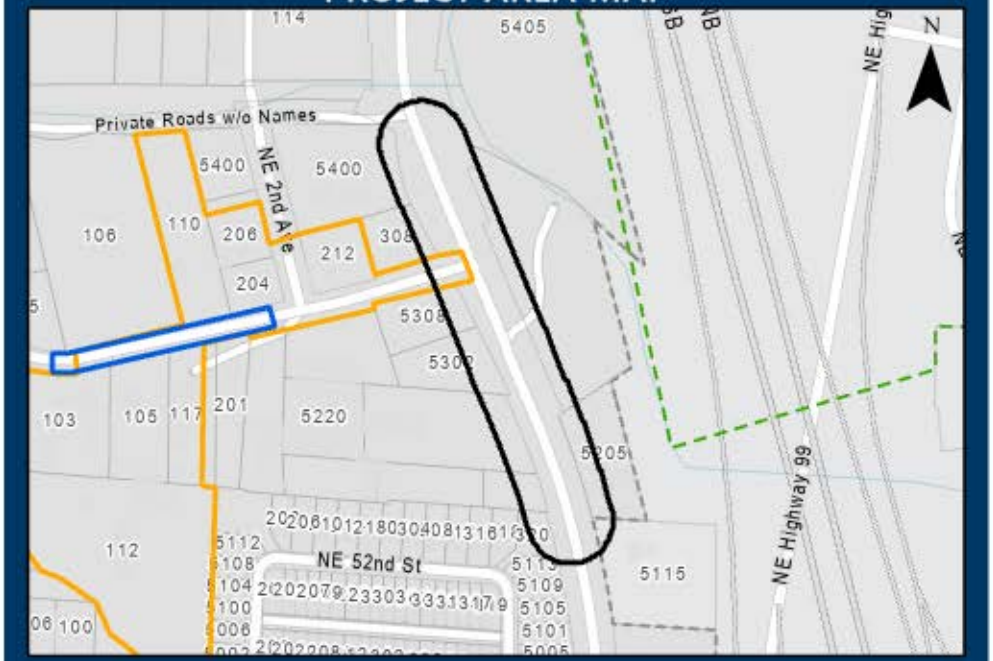
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

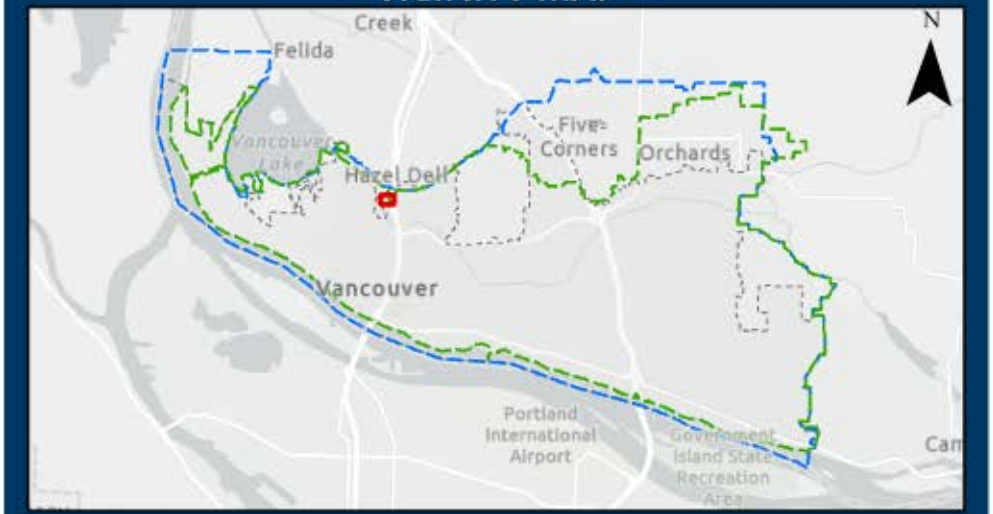
Project: Hazel Dell Avenue and Burnt Bridge Creek Trail Crossing Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
The Burnt Bridge Creek Trail Crossing at Hazel Dell Avenue does not have mobility crossings between the BBC trail in the City on the east side of Hazel Dell Avenue and the BBC trail in the County on the west side of Hazel Dell Avenue Safety is a major concern for users of the facility as there are not designated crossings and the curvature of the road at this location and operating speed of vehicles is dangerous for non-driving, vulnerable road users.

Justification:
The Project would increase safety for current and future users to access trails and recreation opportunities and increase connections between City and County resources for all users across the facility. Identified by staff and the public.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ100914
Grant Funded:	Yes
Grant Amount:	$700,000
Total Project Cost:	$1,000,000
Start of Const. (year):	2026

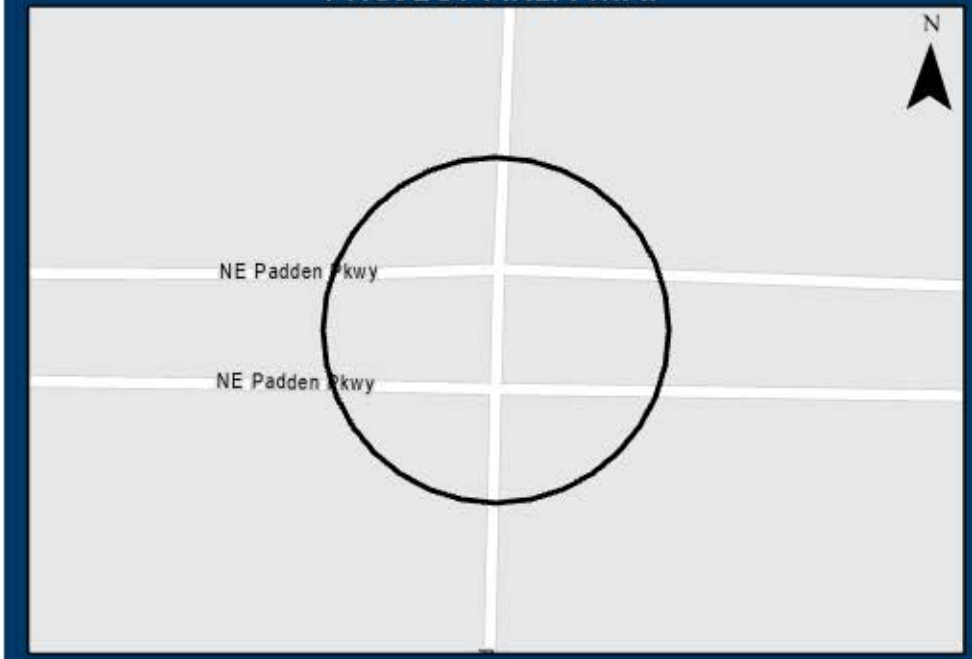
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

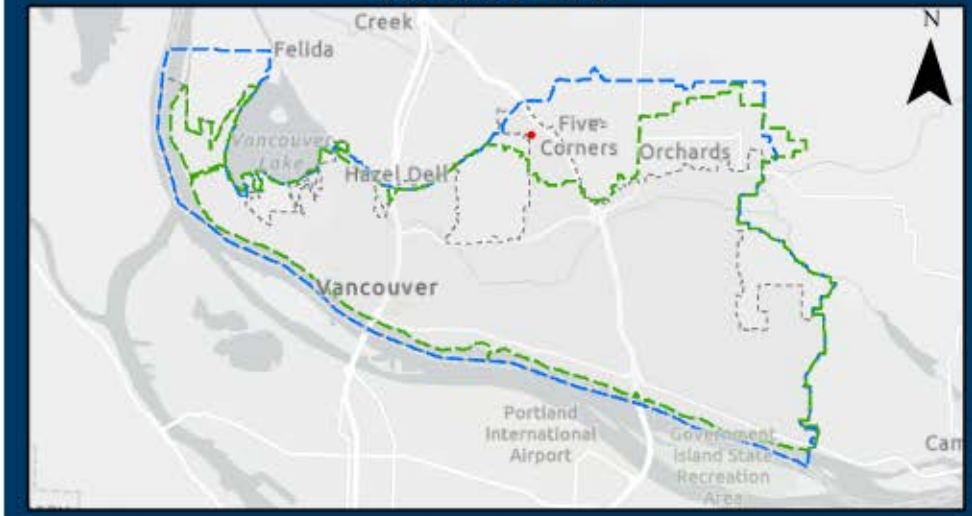
Project: Northeast Padden Expressway and Northeast Andresen Road Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Intersection improvements for capacity, pedestrian safety and traffic standards. Intial planning phase to include congestion and collision study, to propose traffic improvements and alternatives to improve safety and reduce collisions. (Outside 6-year horizon)

Justification:
Southbound Andreson to eastbound Padden turn volumes currently exceed the intersection capacity. Identified by staff.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $10,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

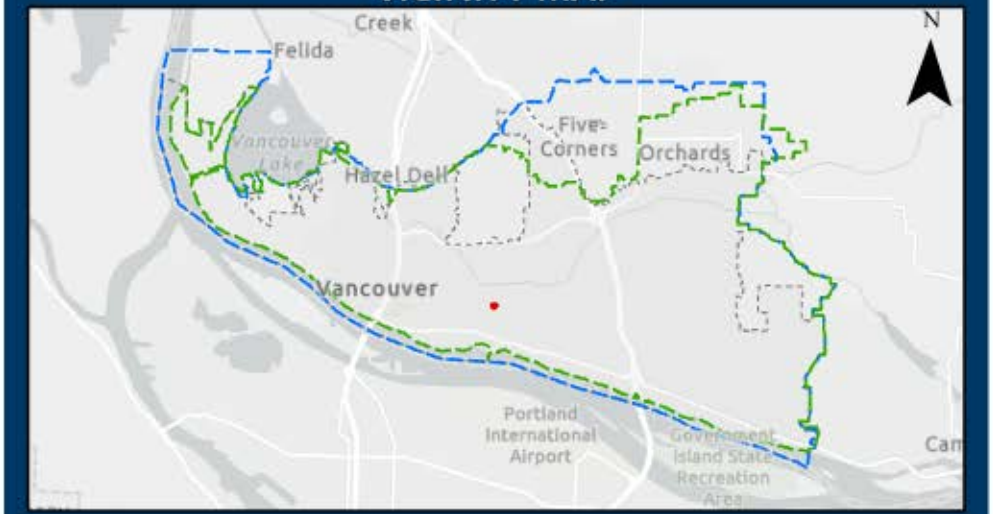
Project: MacArthur Boulevard and South Blandford Drive Pedestrian Crossing

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install enhanced pedestrian crossing to improve pedestrian safety and accesssibility in the area. Originated from Heights District Plan (2020). (Outside 6-year horizon)

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

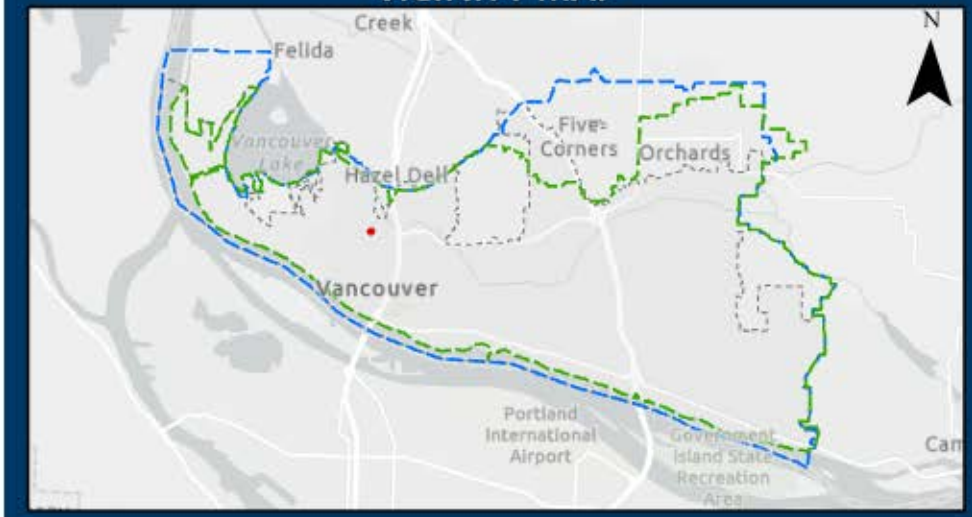
Project: Lincoln Elementary School Crossing Improvements (SRTS)

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
Install high-visibility crosswalk, stop line at uncontrolled crosswalks, rectangular rapid flashing beacon, "Stop for Pedestrian" signs, ADA curb ramps, accessible pedestrian signals near Lincoln Elementary School at West 39th Street and Daniels Street.

Justification:
Improve safety and accessiblity. Identified by staff and the public.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101245
Grant Funded:	Yes
Grant Amount:	$300,000
Total Project Cost:	$300,000
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

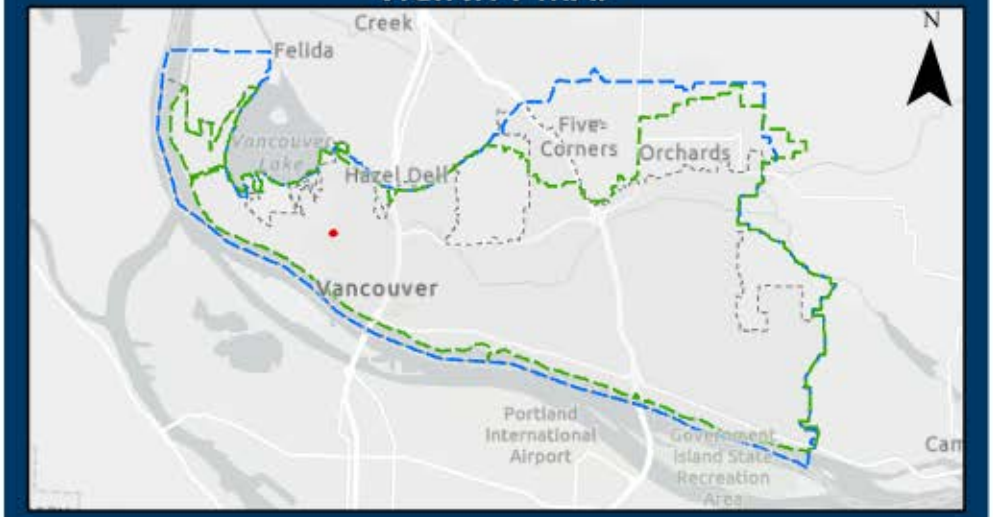
Project: Fruit Valley Road and Firestone Lane Pedestrian Crossing

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install enhanced pedestrian crossing to improve pedestrian safety and accesssibility in the area. (Outside 6-year horizon)

Justification:
Originated from Fruit Valley Subarea Plan (2010).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

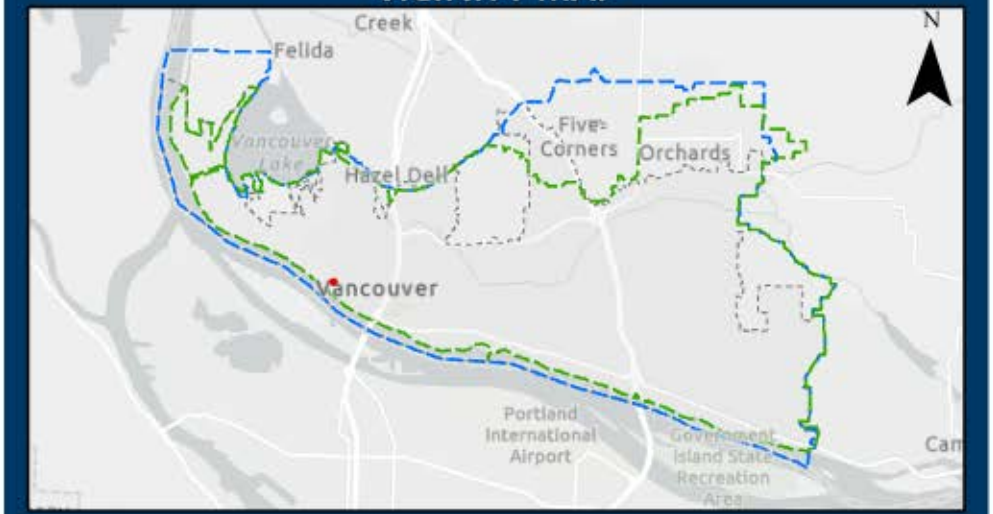
Project: West 16th Street at Northwest Packing Company Pedestrian Crossing

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install enhanced pedestrian crossing to improve pedestrian safety and accesssibility in the area. (Outside 6-year horizon)

Justification:
Originated from Fruit Valley Subarea Plan (2010).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): 2023

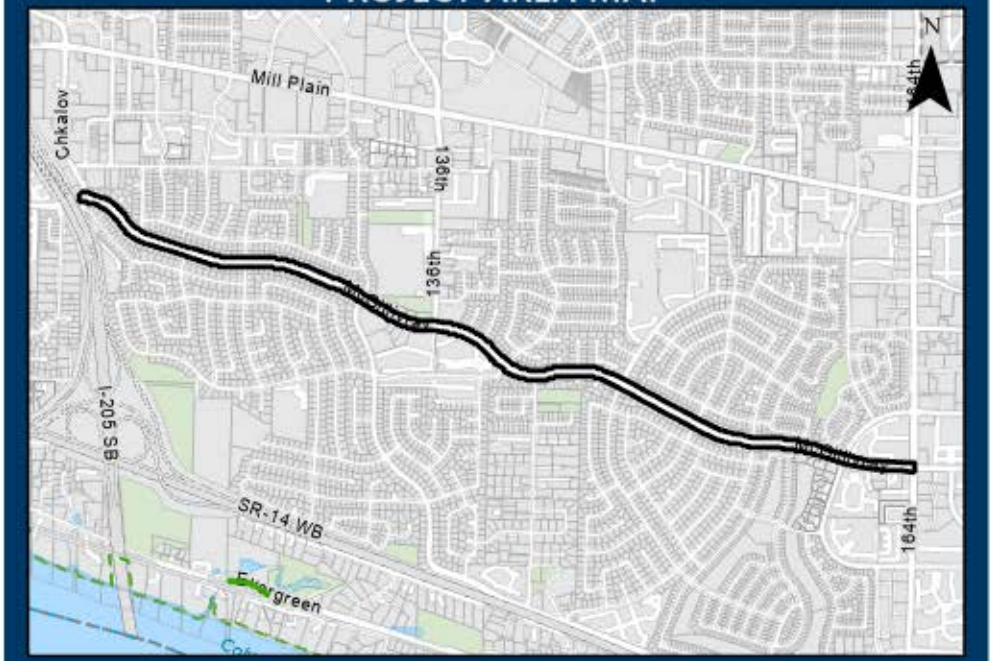
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

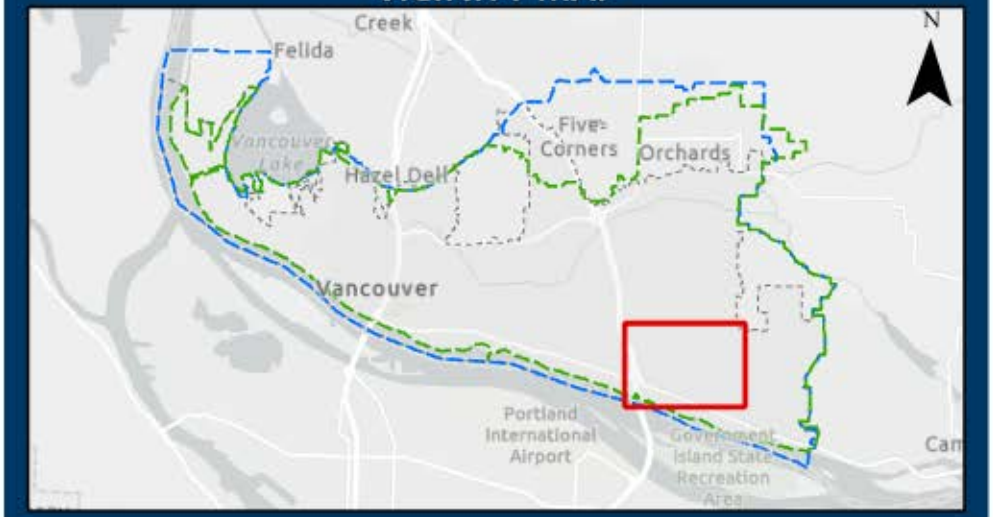
Project: McGillivray Complete Street and Paving Project - Chkalov Drive to Northeast 164th Avenue

Project Extent: Chkalov Drive **To:** Northeast 164th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
The McGillivray Boulevard Complete Street Project explored opportunities to make McGillivray Boulevard safer and more comfortable for everyone to travel between Southeast Chkalov Drive and Southeast 164th Avenue. The Project evaluated how McGillivray Boulevard can better meet the needs of people walking, biking, using a mobility device, and driving. The Project explored opportunities and examine tradeoffs to improve safety on the corridor ahead of the pavement project planned to occur in 2026.

Justification:
Improving safety, mobility, and providing additional modal choices for road users. Identified by project team and recommended by the Transportation and Mobility Commission.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ100802
Grant Funded:	No
Grant Amount:	$
Total Project Cost:	$7,500,000
Start of Const. (year):	2026

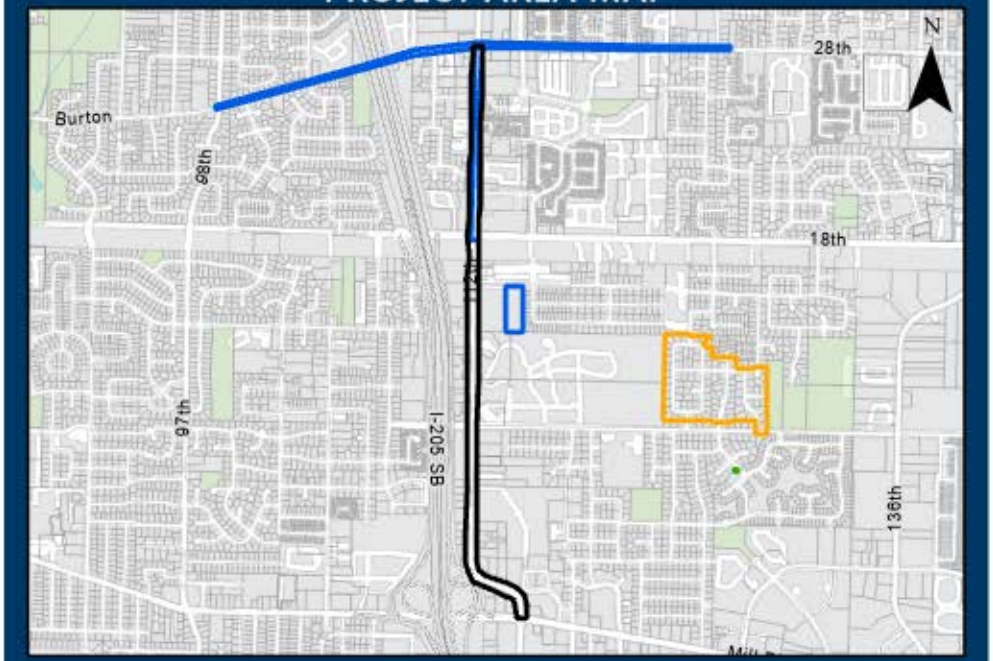
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

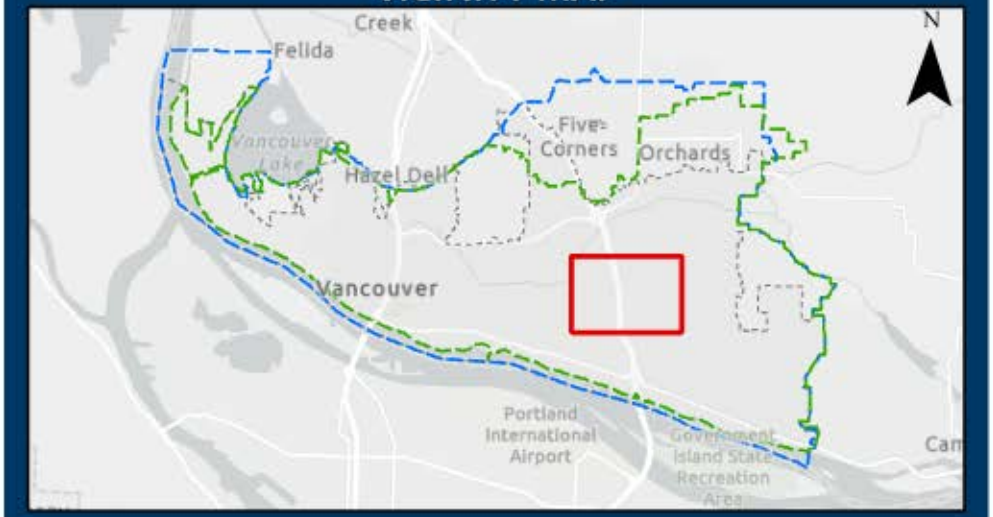
Project: Northeast 112th Avenue Complete Street and Paving Project - Mill Plain Boulevard to Northeast 28th Street

Project Extent: Mill Plain Boulevard **To:** Northeast 28th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
The Northeast 112th Avenue Complete Street Project between Mill Plain Boulevard and 28th Street will repave and restripe to one general purpose lane, center turn lane, widen travel lanes and add buffered/protected mobility lane between Mill Plain Boulevard and 18th Street. Repave road and match existing configuration between 18th and 28th Streets.

Justification:
The Northeast 112th Avenue Complete Street Project explore the major street retrofit on 112th Avenue between Mill Plain Boulevard and 28th Street, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ100923
Grant Funded:	Yes
Grant Amount:	$4,000,000
Total Project Cost:	$3,500,000
Start of Const. (year):	2027

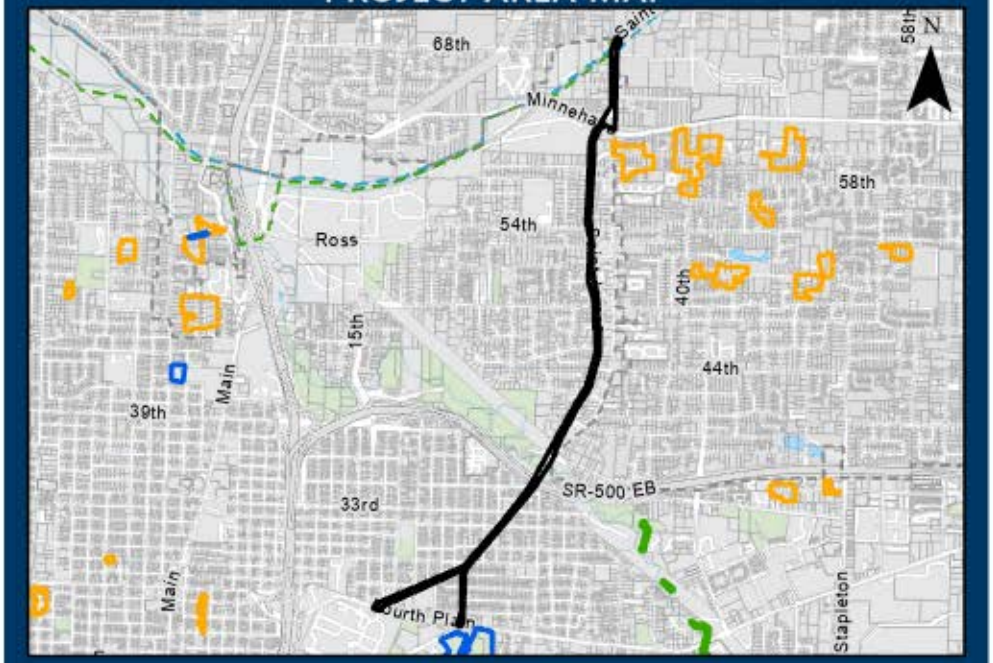
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

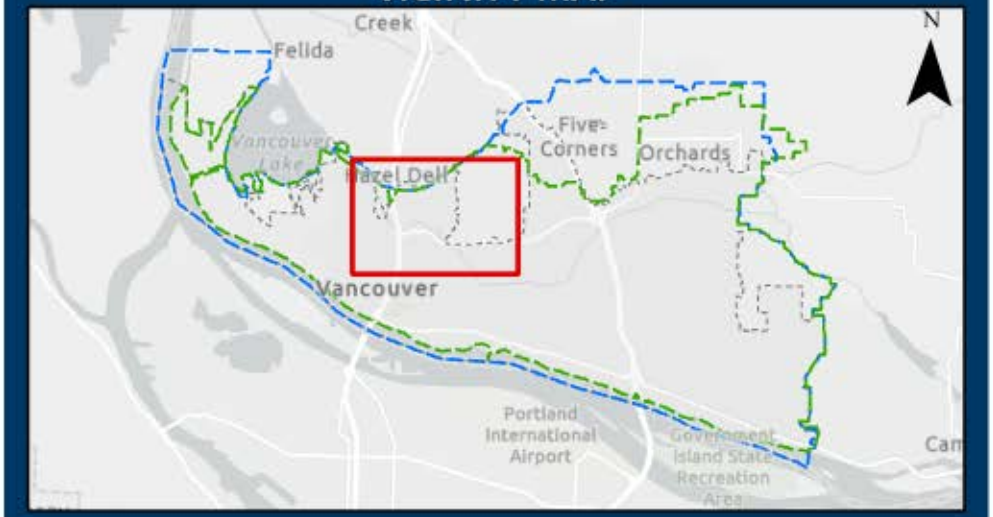
Project: Saint Johns/Saint James Complete Street and Paving Project - Fourth Plain Boulevard to City Limits

Project Extent: Fourth Plain Boulevard **To:** City Limits

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The Saint Johns/Saint James Complete Street and Paving Project includes design concept options to create and implement safety and mobility improvements. The project limits include Saint Johns Boulevard from Fourth Plain Boulevard to State Route-500, Saint James Road from State Route-500 to City Limits, and Fort Vancouver Way from Fourth Plain Boulevard to Saint Johns Boulevard.

Justification:
These streets have documented safety issues and vulnerable street users. This project was identified by City Council as a priority corridor in the Complete Streets Policy and as a commercial corridor in the Comprehensive Plan. Concept Design Options Corridor Plan outlines improvements over time and was recommended by the TMC.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100805

Grant Funded: No

Grant Amount: $

Total Project Cost: $8,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

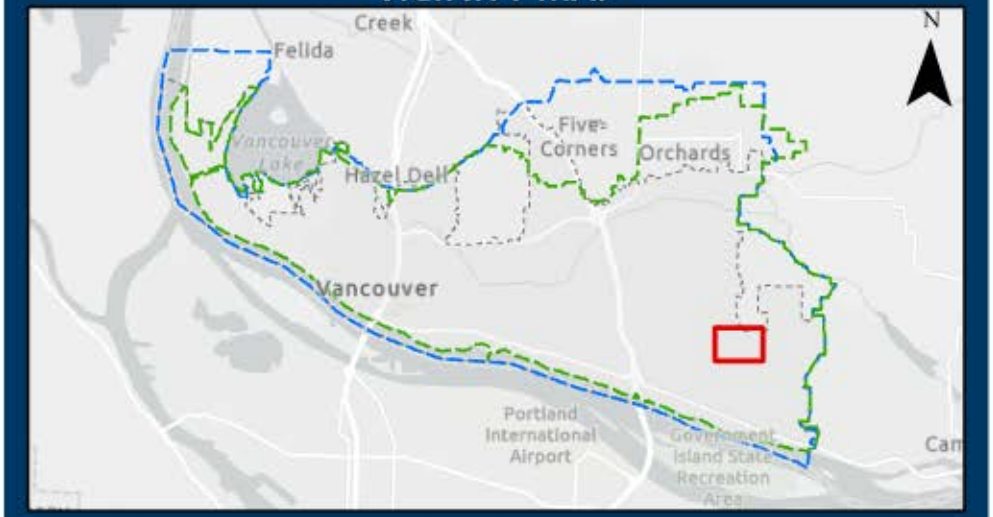
Project: Southeast 164th Avenue Safety/Mobility Improvements - Tech Center Drive to Southeast 1st Street

Project Extent: Tech Center Drive **To:** Southeast 1st Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Southeast 164th Avenue is the site of two top priority crash locations, the segment between Southeast 1st Street and Mill Plain Boulevard and the intersection with Southeast Tech Center Drive/12th Street. There have been three fatalities and two severe injuries on the segment and at the intersection, and four additional pedestrian injuries at the intersection. The project will include elements to address crash factors, such as treatments related to signal phases, intersection configurations, pavement markings, installation of refuge islands or raised crossings, and other measures. (Outside 6-year horizon)

Justification:
Improving safety and mobility. Identified from the Transportation System Safety Analysis (2018) and Local Road Safety Plan (2022).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

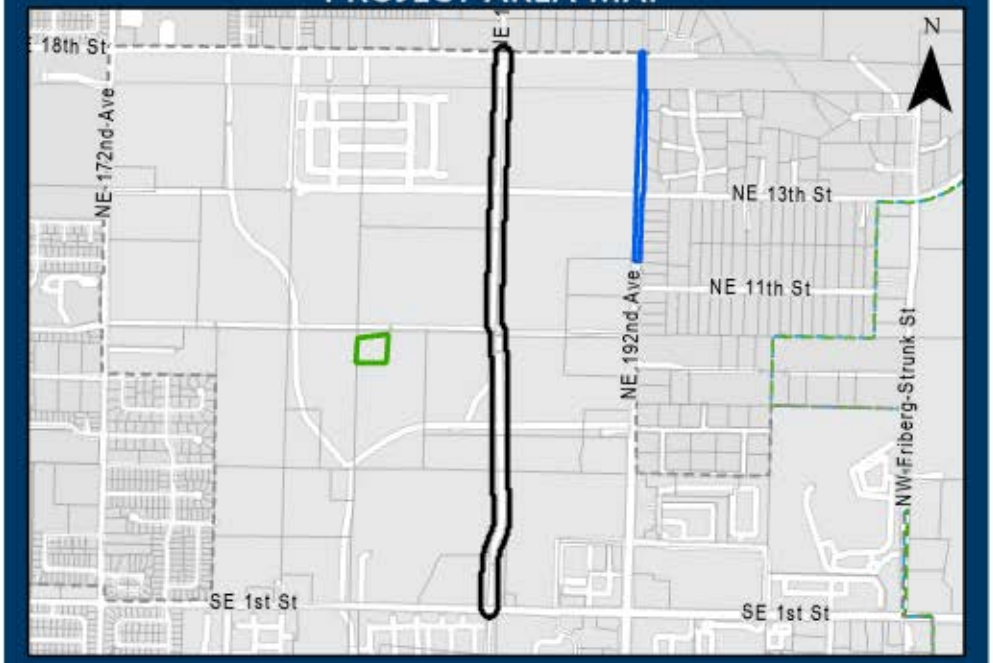
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

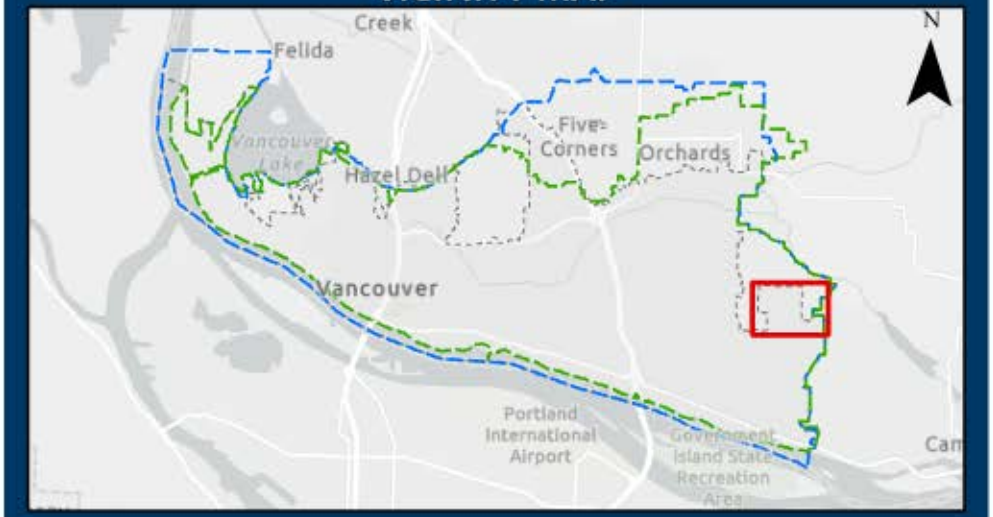
Project: Northeast 187th Avenue - Southeast 1st Street to Northeast 18th Street

Project Extent: Southeast 1st Street **To:** Northeast 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New 3-lane collector/minor arterial (1 lane each direction plus center turn lane) with sidewalks, mobility lanes, streetlights, signals, school crossings, stormwater and sound walls where required.

Justification:
Project addresess capacity, safety conditions and providing multimodal access. Identified by Section 30 Subarea Plan.

Priority Score:
Medium-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $13,000,000

Start of Const. (year): Unknown

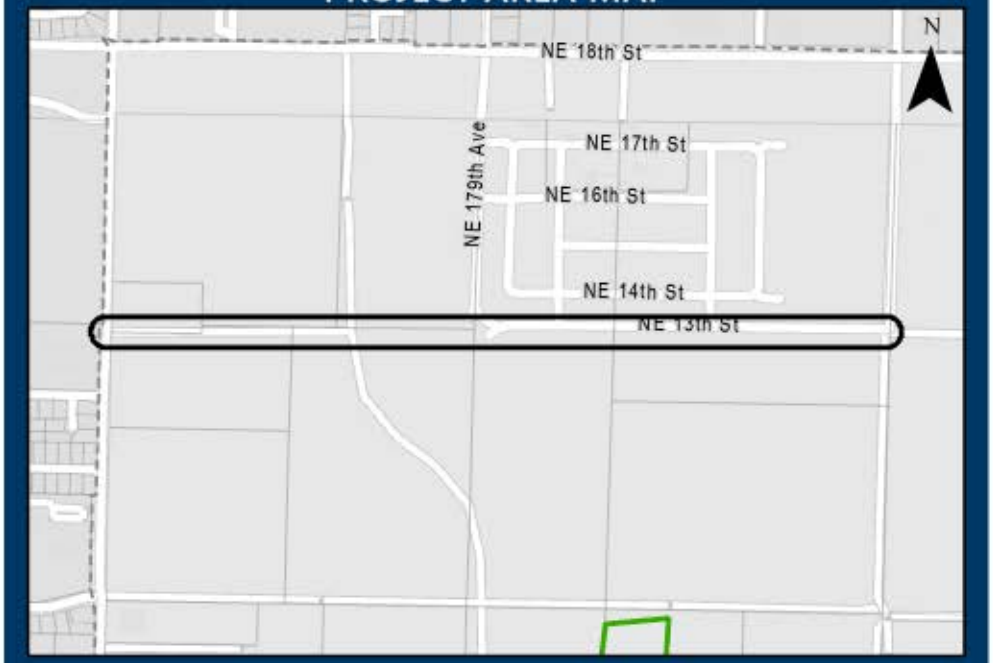
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

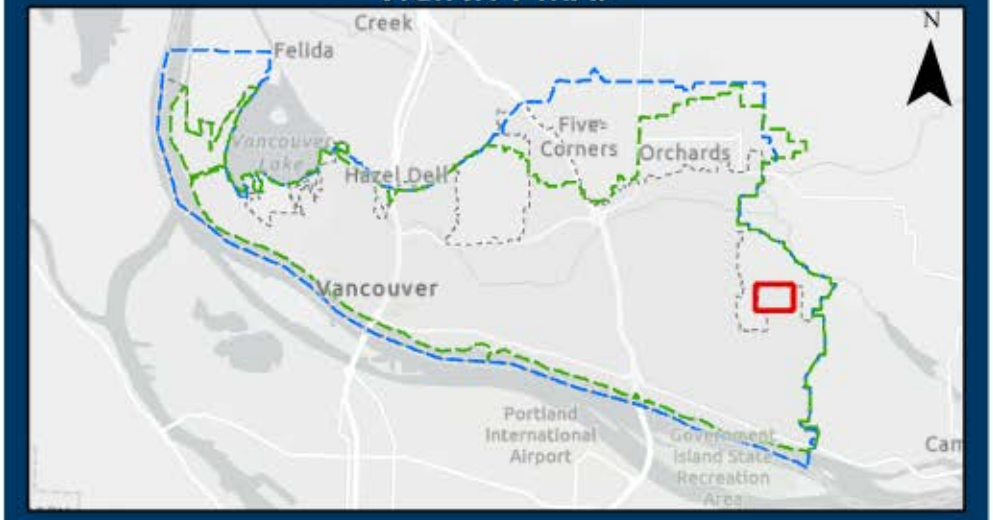
Project: Northeast 13th Street - Northeast 172nd Avenue to Northeast 187th Avenue

Project Extent: Northeast 172nd Avenue **To:** Northeast 187th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New 3-lane collector/minor arterial (1 lane each direction plus center turn lane) with sidewalks, mobility lanes, streetlights, signals, school crossings, stormwater and sound walls where required.

Justification:
Project addresess capacity, safety conditions and providing multimodal access. Identified by Section 30 Subarea Plan.

Priority Score:
Long-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $18,000,000

Start of Const. (year): Unknown

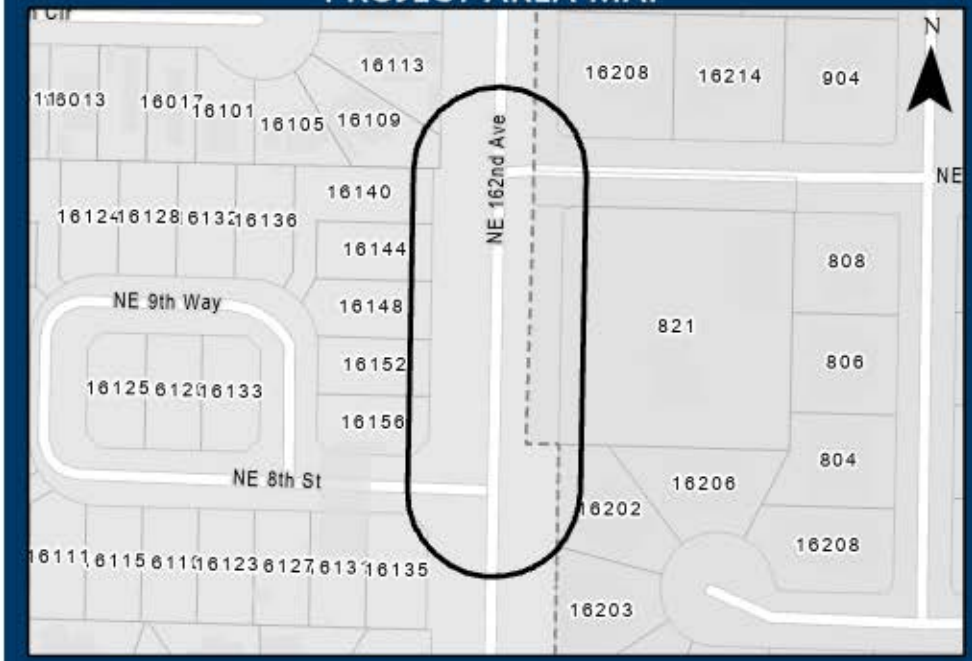
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

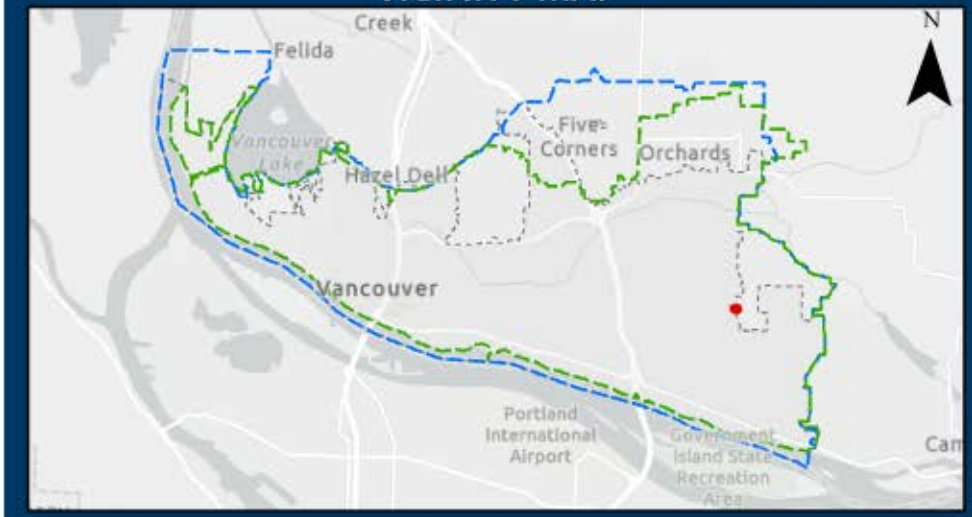
Project: Northeast 162nd Avenue and Northeast 9th Street Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The Northeast 162nd Avenue and Northeast 9th Street Intersection Improvements will include a signalized intersection and the east leg of the intersection will be striped to provide a westbound left-turn lane. (Outside 6-year horizon)

Justification:
Improving safety and mobility. This project is taking on the recommendations from the Section 30 Traffic Study.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

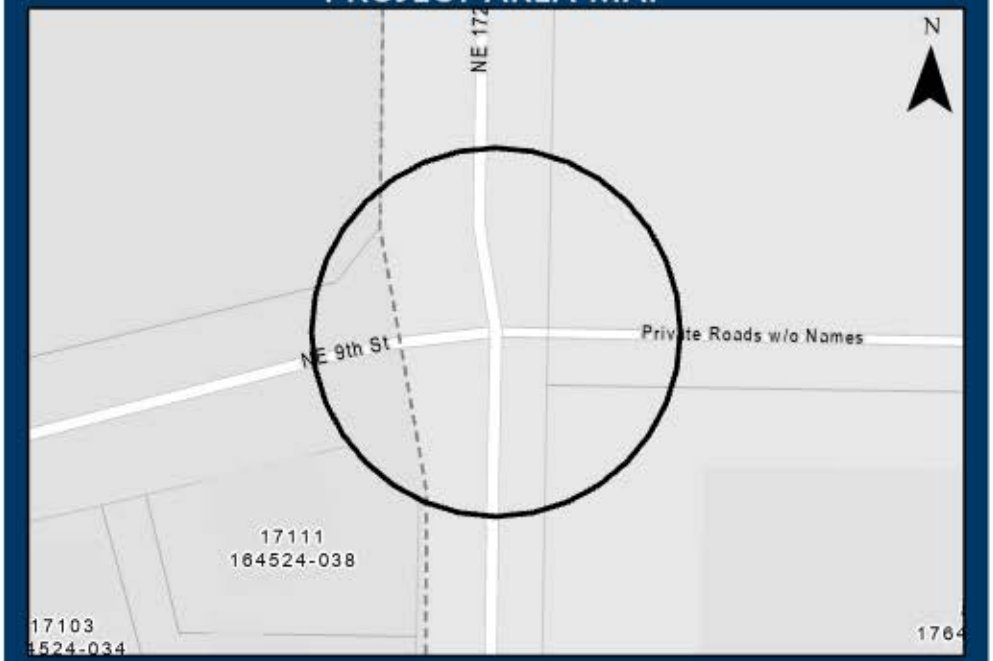
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

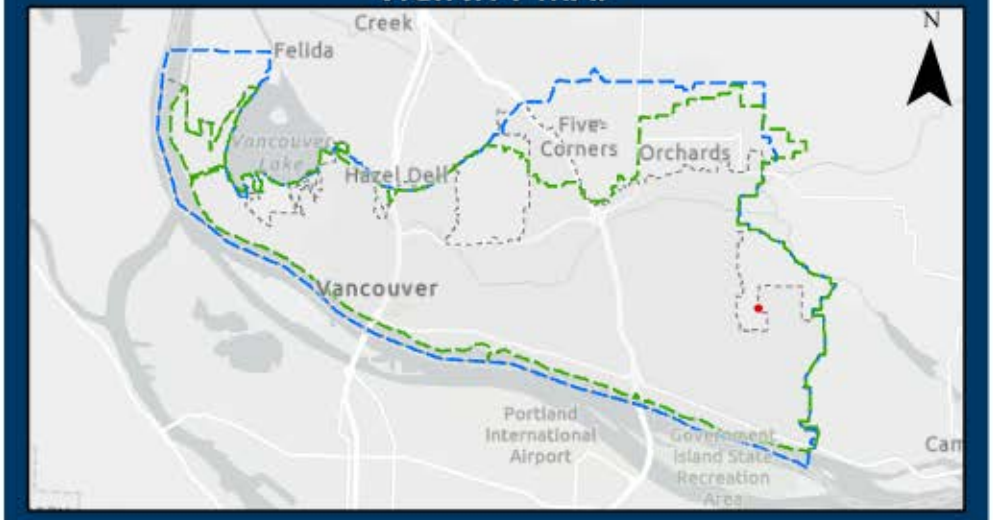
Project: Northeast 172nd Avenue and Northeast 9th Street Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The Northeast 172nd Avenue and Northeast 9th Intersection Improvements will include a signalized intersection or a single lane roundabout. (Outside 6-year horizon)

Justification:
Improving safety and mobility. This project is taking on the recommendations from the Section 30 Traffic Study.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

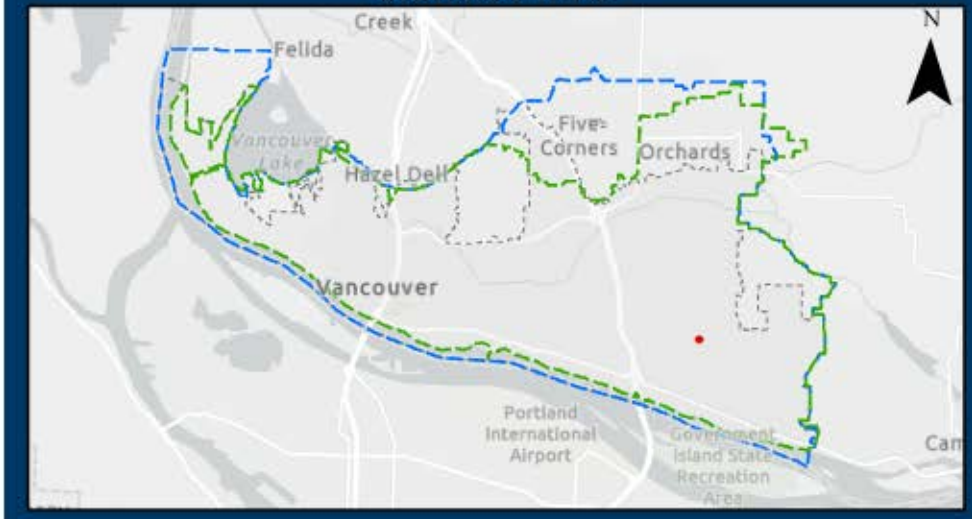
Project: Mill Plain Boulevard and Hearthwood Boulevard Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Mill Plain Boulevard and Hearthwood Boulevard are each wide arterials whose intersection had seen crashes that resulted in severe and fatal injuries. The confluence of transit, heavy vehicle traffic on Mill Plain Boulevard, and permissive left turns across the path of pedestrians and mobility users have led to crashes that resulted in severe and fatal injuries. The project will include elements to address crash factors, such as treatments related to signal phases, intersection configurations, pavement markings, and other measures.

Justification:
Improving safety, mobility, and providing additional modal choices for road users. Identified from the Transportation System Safety Analysis (2018) and Local Road Safety Plan (2022).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

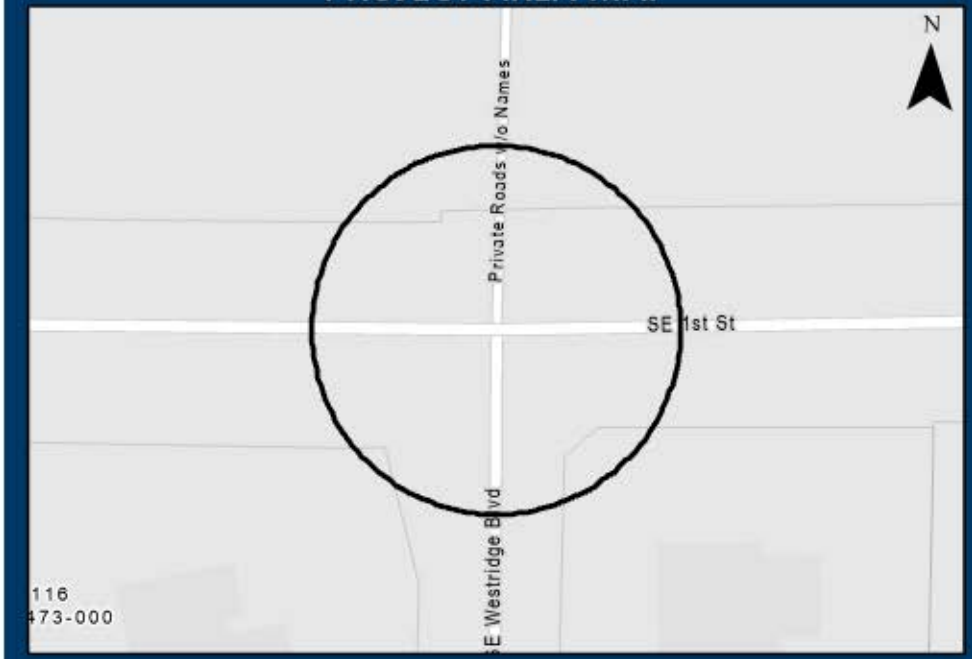
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

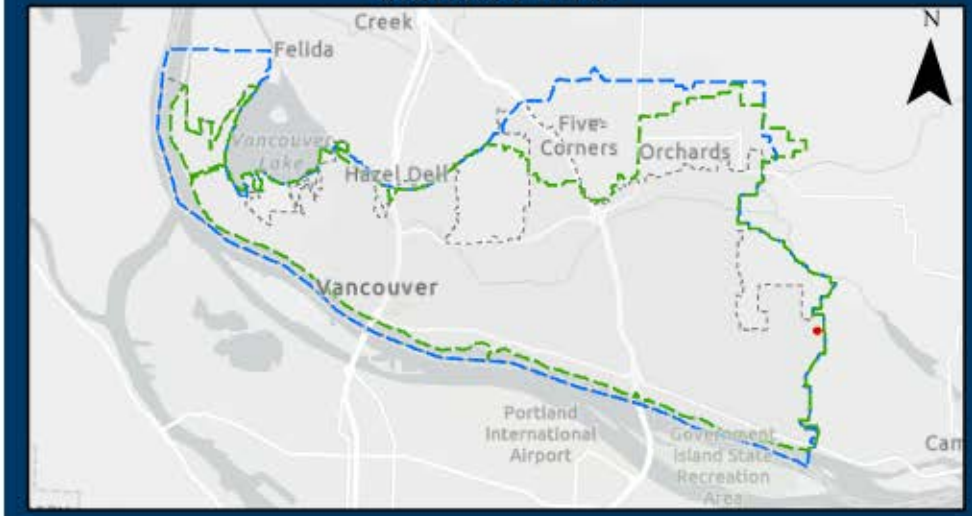
Project: Southeast Westridge Boulevard and Southeast 1st Street Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The Southeast Westridge Boulevard and Southeast 1st Street intersection improvements will include a signalized intersection.

Justification:
Improving safety and mobility. Identified through the development review process.

Priority Score:
Medium-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,500,000

Start of Const. (year): Unknown

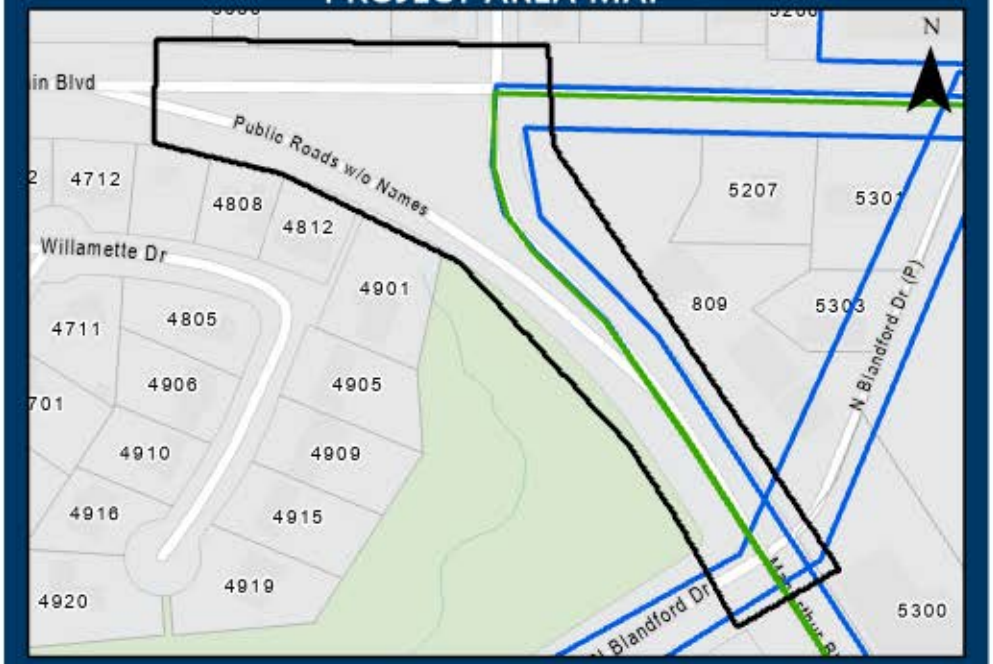
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

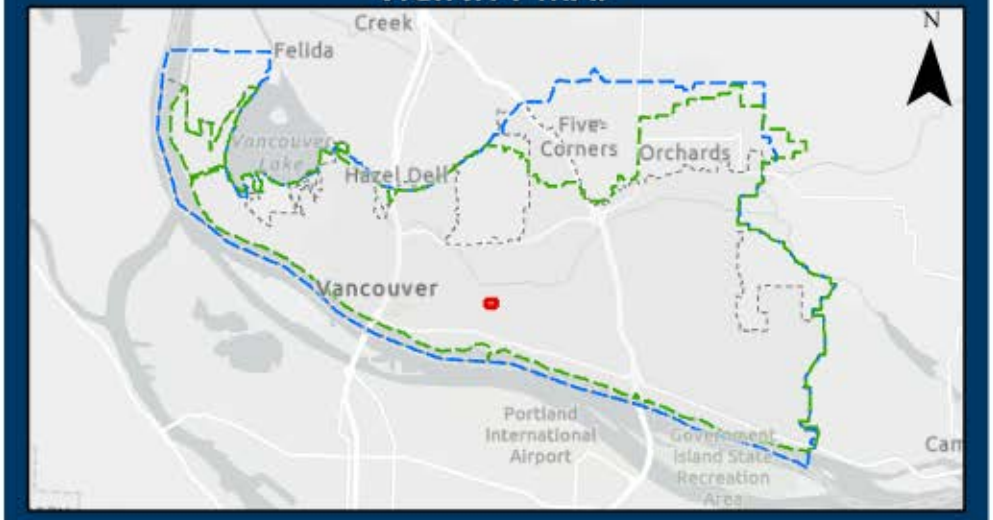
Project: Mill Plain/MacArthur Intersection Improvements

Project Extent: East Mill Plan Boulevard **To:** Blandford Drive

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Heights District Plan recommended roadway changes to improve safety, support multi-modal mobility, and add a linear greenbelt. Includes moving vehicle travel to the east side of the median and converting the west side to separated mobility lanes and pedestrian facilities, and open space. Will include improved ADA access and pedestrian crossings at Blanford, Phoenix, Texas and Burdick.

Justification:
Provide economic development and improve access and mobility. Originated from Heights District Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number:	PRJ101031
Grant Funded:	Yes
Grant Amount:	$4,000,000
Total Project Cost:	$10,000,000
Start of Const. (year):	2026

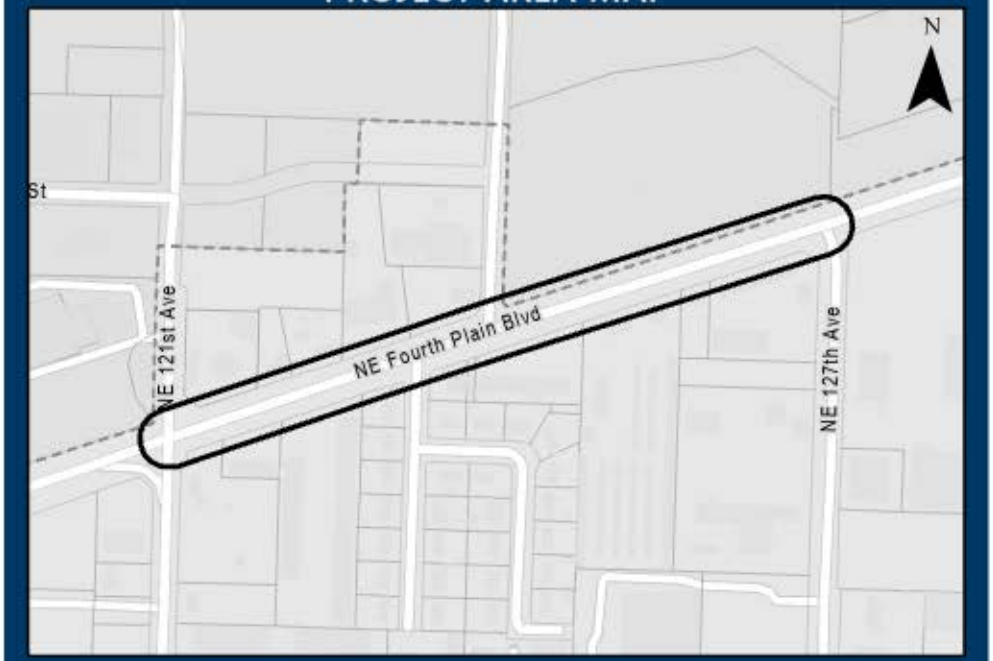
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

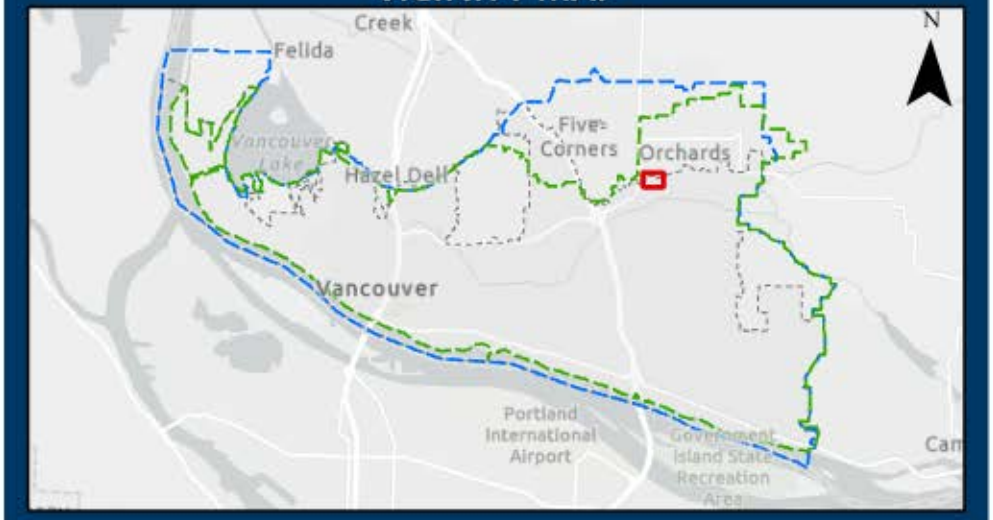
Project: Fourth Plain Boulevard Safety and Mobility - 121st Avenue to 127th Avenue

Project Extent: 121st Avenue **To:** 127th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Fourth Plain Boulevard is one of the most dangerous roadways in the City, with high frequency and severity of crashes at several segments and intersections. The multimodal roadway sees people traveling in all modes, including vis bus rapid transit service. While the Fourth Plain Safety and Mobility Project will address several dangerous segments and intersections, the remaining intersection and segment are identified for safety improvements that could include roadway reconfigurations, changing signal phasing, installing lighting, and reducing crash exposure for vulnerable users. (Outside 6-year horizon)

Justification:
Improving safety, mobility, and providing multimodal choices for road users. This project was identified in the Local Roads Safety Plan (2022) and Transportation System Safety Analysis (2018).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

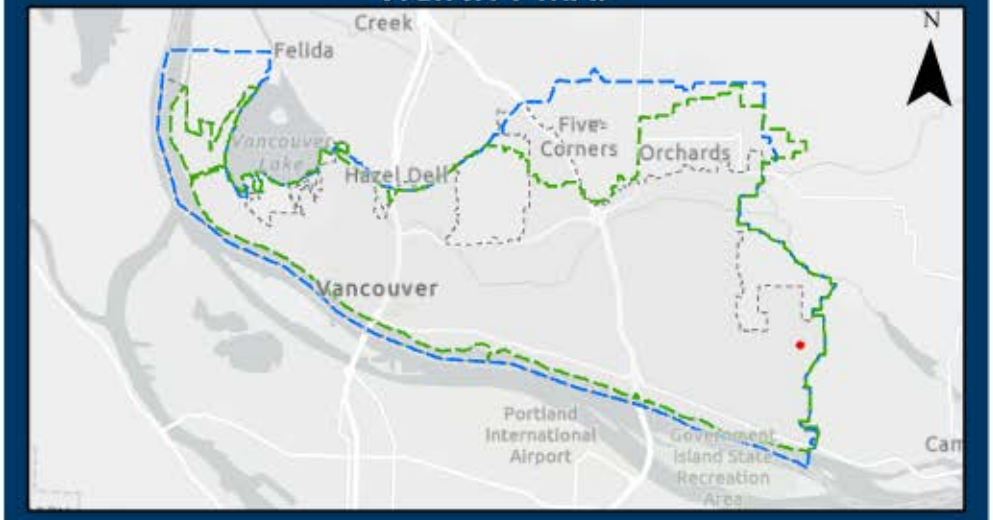
Project: Southeast 192nd Avenue and Mill Plain Boulevard Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Project elements will look at crash countermeasures related to high traffic volumes, number of commercial driveways, roadway configurations and insufficient infrastructure for pedestrians or mobility users. (Outside 6-year horizon)

Justification:
Improve safety, mobility and provide mulitmodal access. Originated from Transportation System Safety Analysis (2018) and Local Road Safety Plan (2022).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

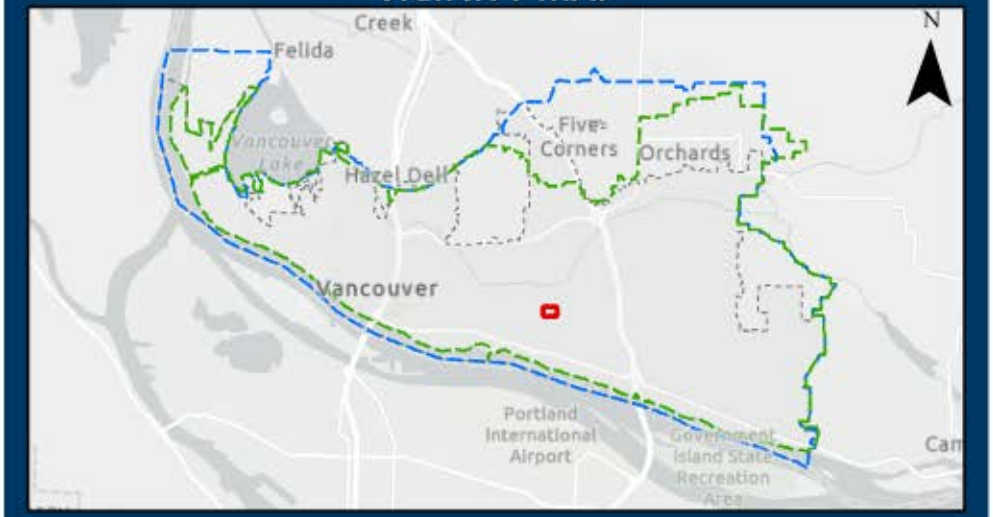
Project: Garrison Road Sidewalk Infill - Mill Plain to Northeast 12th Street

Project Extent: Mill Plain Boulevard **To:** Northeast 12th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Install sidewalks and ADA ramps along Garrison Road from Mill Plain to David Douglas Park/ Northeast 12th Street.

Justification:
Improve safety and mobility. Identified by staff and public with support from WSDOT.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ100922
Grant Funded:	Yes
Grant Amount:	$1,000,000
Total Project Cost:	$1,600,000
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Grand Loop Infrastructure Improvements

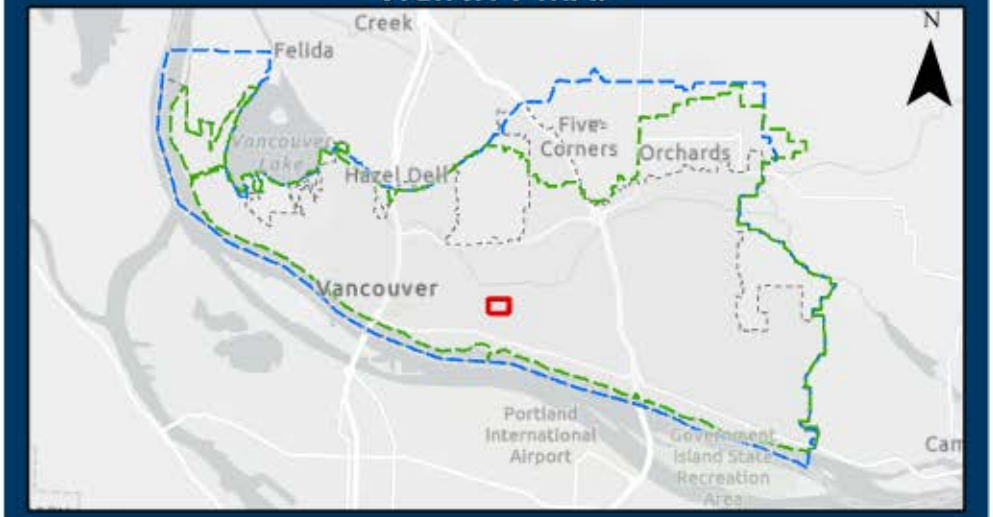
Project Extent:

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Pursuant to the Heights District Master Plan, construct a network of street, pedestrian and mobility improvements that form a loop around the central core of the Tower Mall Redevelopment Area, providing connections between MacArthur Boulevard, Devine Road and Mill Plain Boulevard.

Justification:
Improve safety, mobility and provide mulitmodal access. Project originated from the Heights District Master Plan (2020).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101098
Grant Funded:	No
Grant Amount:	$
Total Project Cost:	$20,000,000
Start of Const. (year):	2026

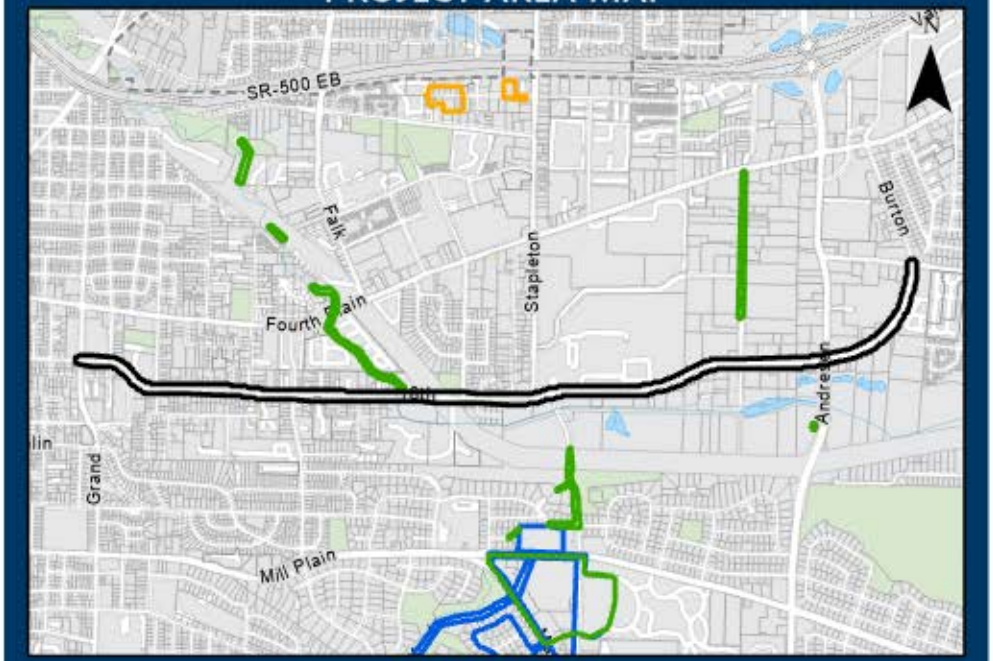
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

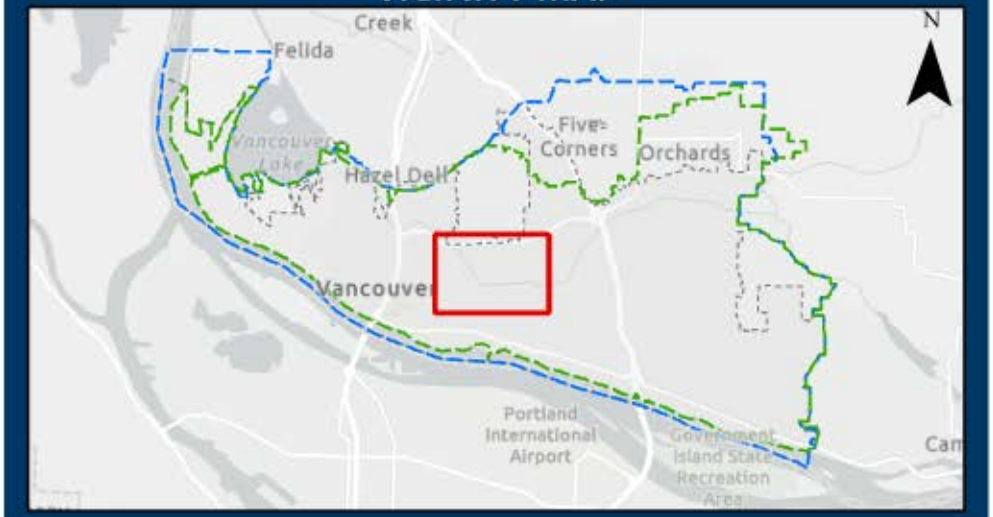
Project: East 18th Street Mobility Lane Improvements and Traffic Calming - Grand Boulevard to Northeast Burton Road

Project Extent: Grand Boulevard **To:** Northeast Burton Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Improve safety and comfort of mobility lanes on East 18th Street between Grand Boulevard and Northeast Burton Road through the addition of a buffer zone and vertical elements where feasible. Explore narrowing existing travel lanes to slow vehicle traffic and create space for buffer, as well as other traffic calming treatments such as lowering the posted speeds. (Outside 6-year horizon)

Justification:
Improve safety and mobility. This project originated in the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

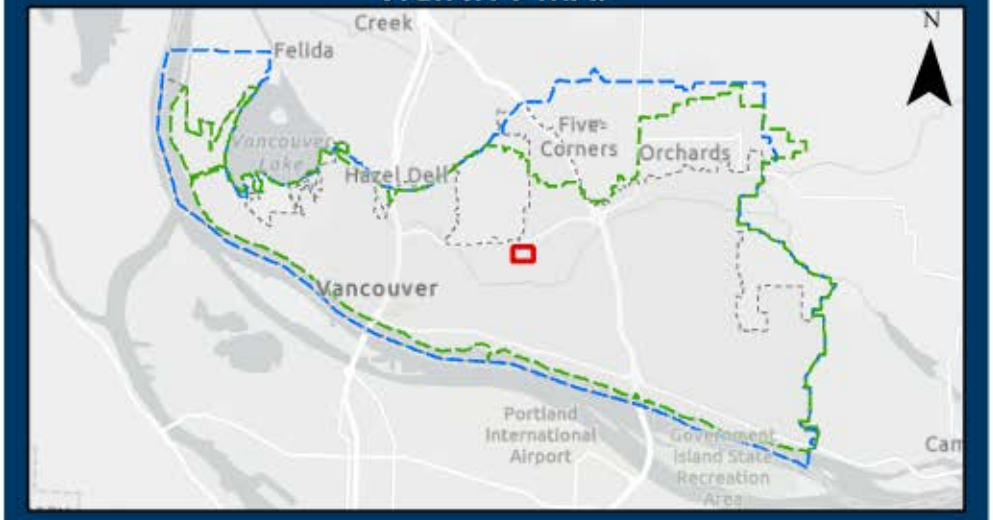
Project: Fourth Plain - 62nd - Andresen Multiuse Path

Project Extent: East 62nd Avenue **To:** Andresen Road

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Build an off-street multiuse facility between Northeast 62nd Avenue and Northeast Andresen Road to serve mobility users traveling along the corridor. Expand existing sidewalk on either north or south side of the road at the back of sidewalk to create additional space to be share with other mobility users. Use emblems or materials to differentiate between pedestrian and mobility user zones.

Justification:
Improve safety, mobility and provide mulitmodal access. This project originated in the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ100959

Grant Funded: No

Grant Amount: $

Total Project Cost: $8,400,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

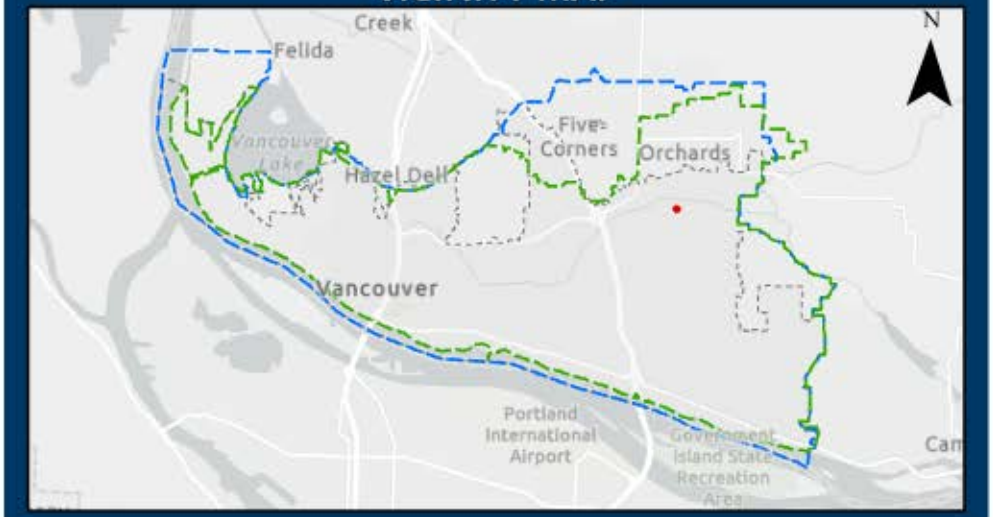
Project: Image Elementary School Pedestrian Crossing Improvements (SRTS)

Project Extent: Northeast 52nd Street **To:** Northeast 135th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
Install high-visibility crosswalk, stop line at uncontrolled crosswalks, "Stop for Pedestrian" signs, rectangular rapid flashing beacon, pedestrian and bicyclist crossing illumination, pedestrian and bicyclist segment illumination, and curb extension at Image Elementary School from Northeast 52nd Street and Northeast 135th Avenue.

Justification:
To improve pedestrian safety and access. Identified by staff and the public.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101246
Grant Funded:	Yes
Grant Amount:	$292,000
Total Project Cost:	$292,000
Start of Const. (year):	2027

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

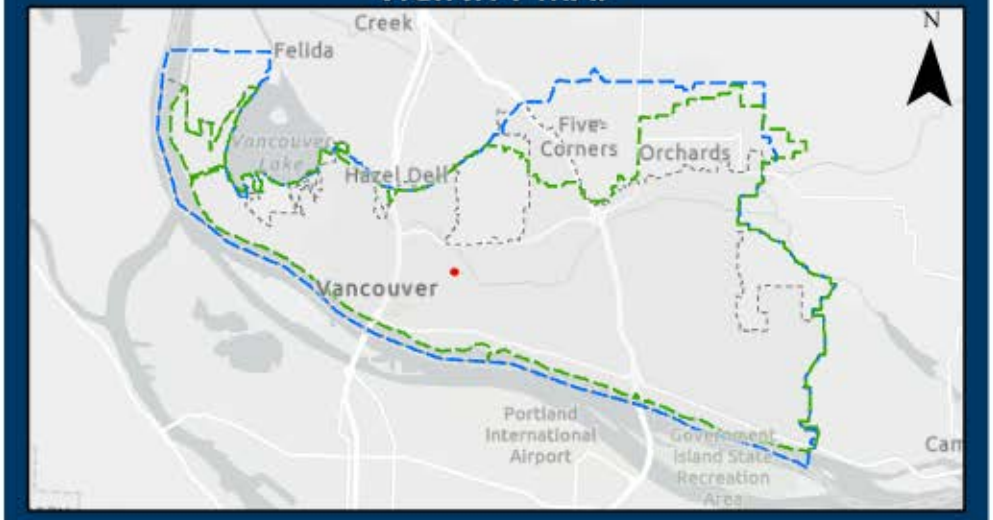
Project: Fourth Plain Boulevard and Laurel Place Pedestrian Crossing (SS4A)

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Install enhanced pedestrian crossing to improve pedestrian safety and accessiblity.

Justification:
To improve pedestrian safety and access. Identified in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101190

Grant Funded: Yes

Grant Amount: $400,000

Total Project Cost: $500,000

Start of Const. (year): 2026

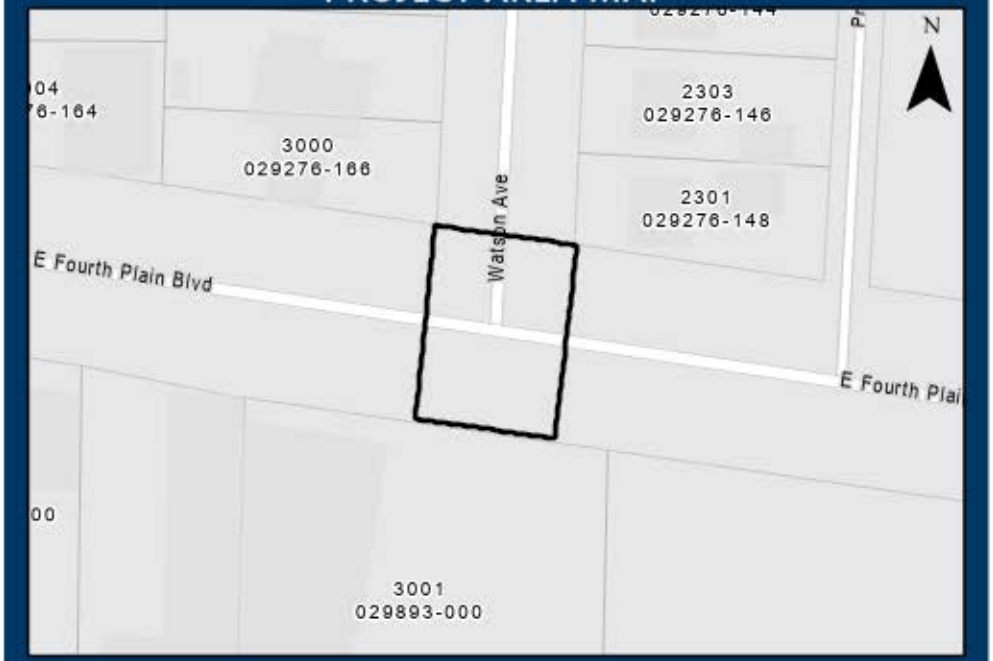
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

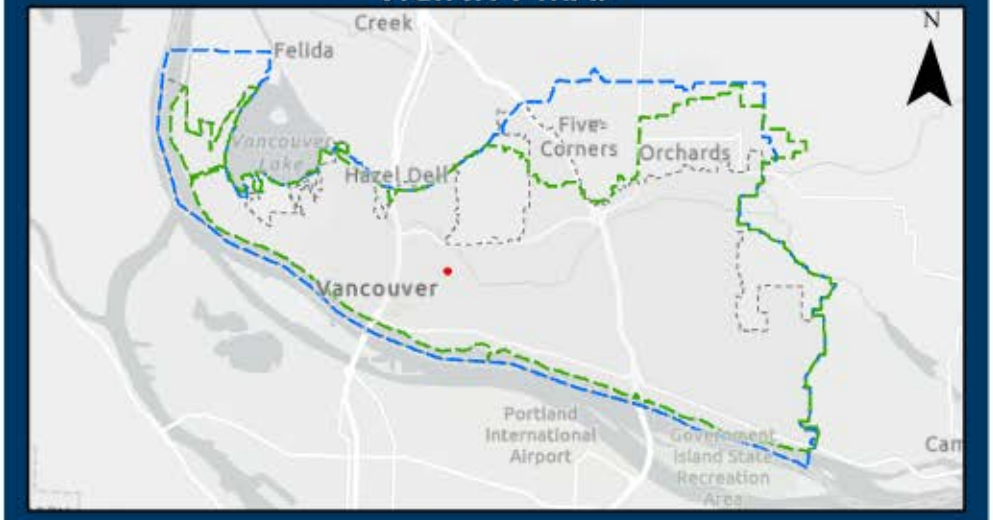
Project: Fourth Plain Boulevard and Watson Avenue Pedestrian Crossing (SS4A)

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
Install enhanced pedestrian crossing to improve pedestrian safety and accessiblity.

Justification:
To improve pedestrian safety and access. Identified in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101190

Grant Funded: Yes

Grant Amount: $400,000

Total Project Cost: $500,000

Start of Const. (year): 2026

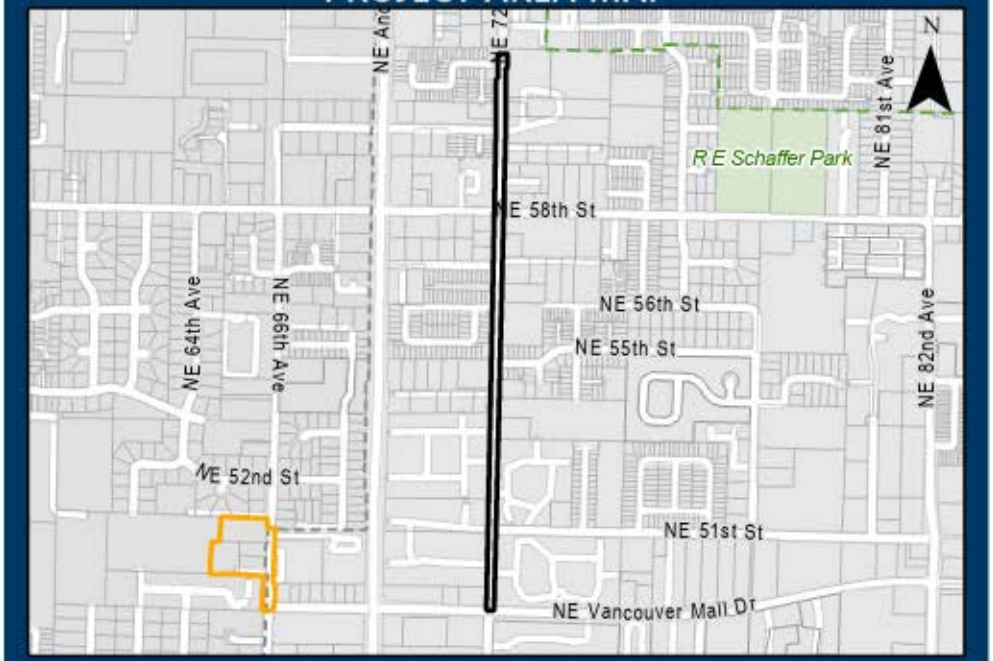
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

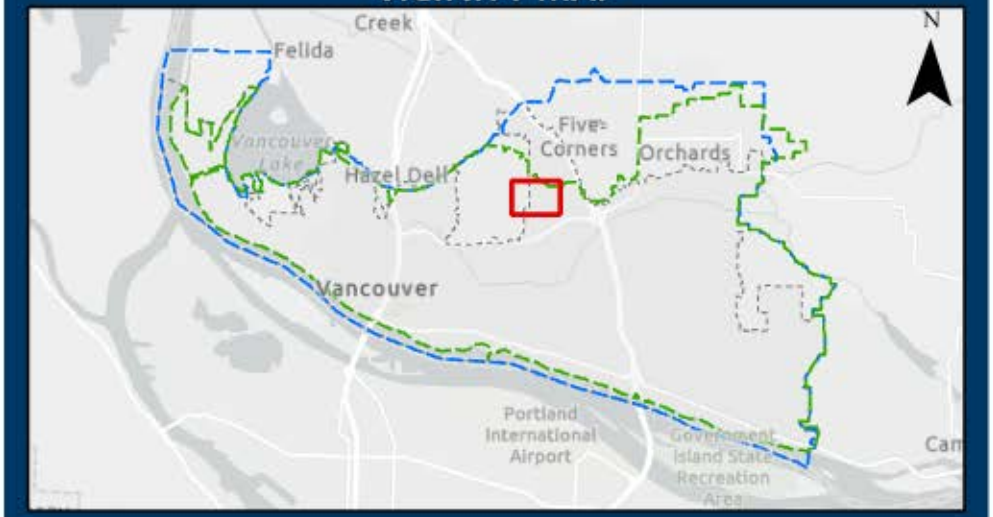
Project: Walnut Grove Elementary School Sidewalk and Pedestrian Crossing Improvements (SRTS)

Project Extent: Van Mall Drive **To:** Walnut Grove Elementary

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
Install high-visibility crosswalk, stop line at controlled crosswalks, pedestrian and bicyclist crossing illumination, ADA curb ramps, accessible pedestrian signals, sidewalk with planted buffer, speed cushions at Walnut Grove Elementary School along Northeast 72nd Avenue.

Justification:
To improve pedestrian safety and access. Identified by staff and by the public.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101244
Grant Funded:	Yes
Grant Amount:	$2,000,000
Total Project Cost:	$2,000,000
Start of Const. (year):	2027

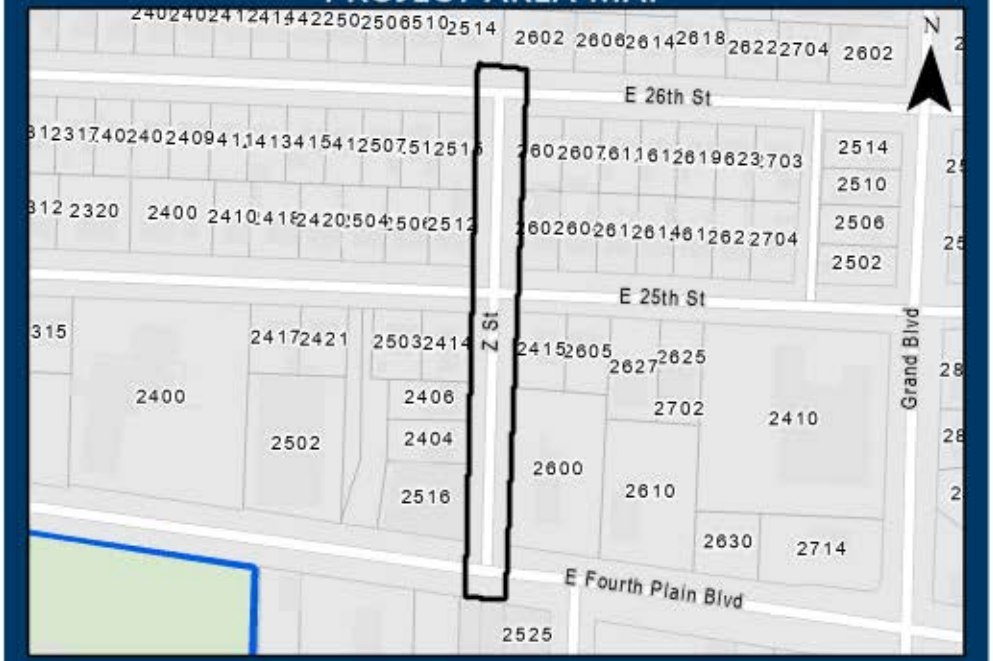
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

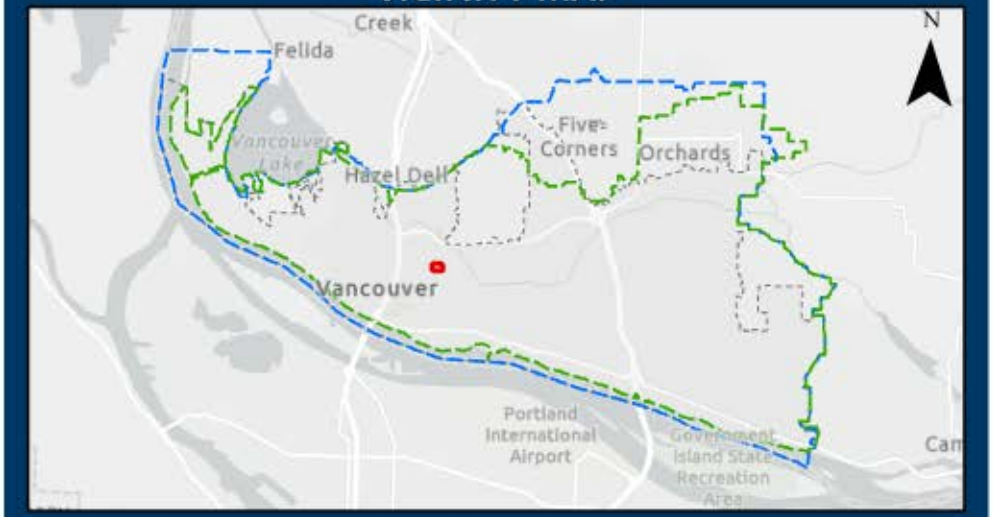
Project: Z Street Sidewalk Improvements - Fourth Plain Boulevard to Northeast 26th Street (SS4A)

Project Extent: Fourth Plain Boulevard **To:** Northeast 26th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
This project will add new sections of sidewalk infill along Z Street from Fourth Plain Boulevard to Northeast 26th Street.

Justification:
To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101190
Grant Funded:	Yes
Grant Amount:	$347,500
Total Project Cost:	$447,500
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

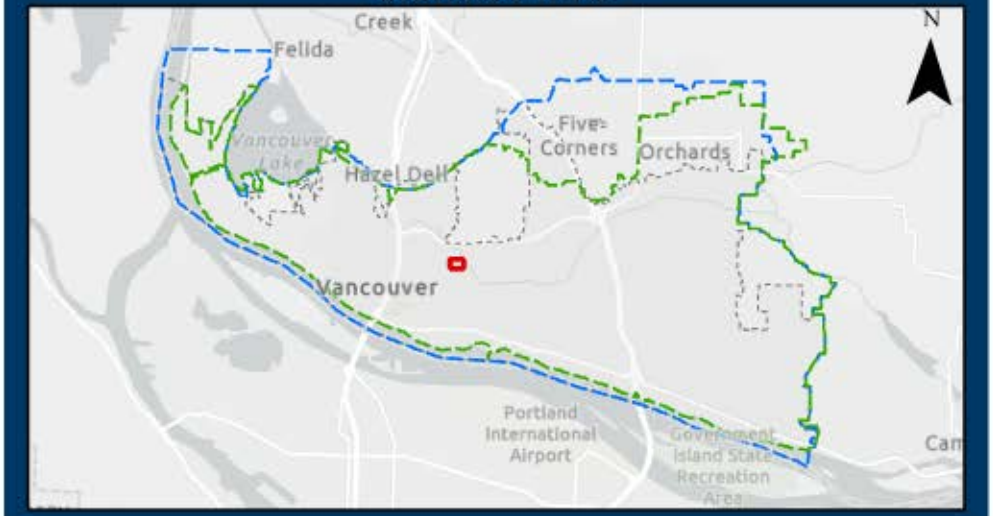
Project: Neals Lane Sidewalk Extension - East 24th Street to East 28th Street (SS4A)

Project Extent: East 24th Street **To:** East 28th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
This project extends the sidewalk along Neals Lane from East 24th Street to East 28th Street.

Justification:
To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101190
Grant Funded:	Yes
Grant Amount:	$535,000
Total Project Cost:	$635,000
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

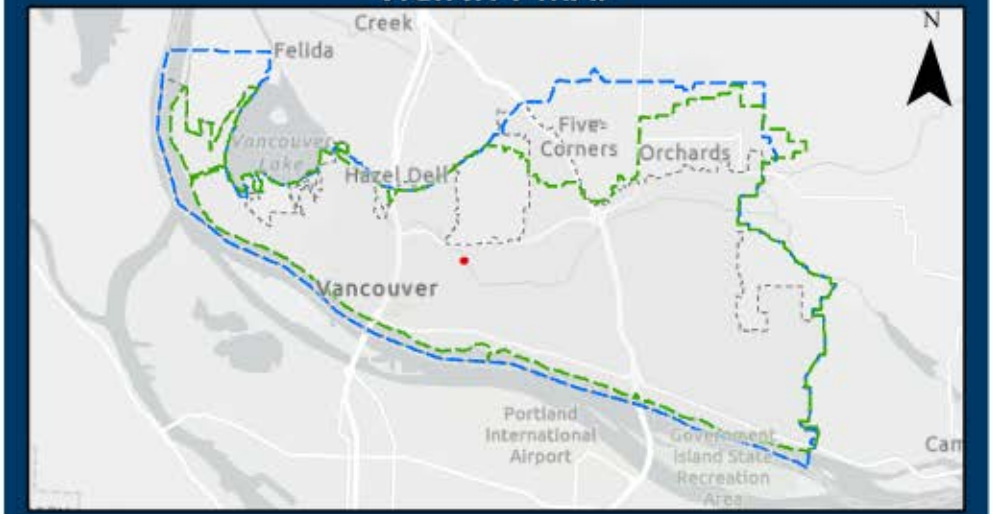
Project: Rossiter Lane to Burnt Bridge Creek Pedestrian Connector (SS4A)

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
This project will add a pedestrian bridge crossing to create a new connection to the Burnt Bridge Creek Trail.

Justification:
To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101190
Grant Funded:	Yes
Grant Amount:	$1,000,000
Total Project Cost:	$1,647,500
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

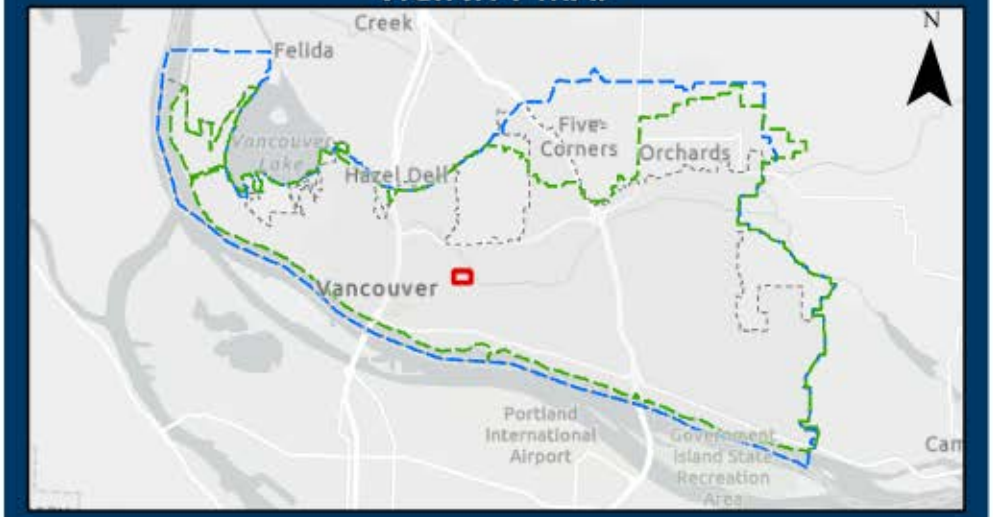
Project: Todd Road Sidewalk Infill - Fourth Plain Boulevard to 18th Street (SS4A)

Project Extent: Fourth Plain Boulevard **To:** 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
This project will add new sections of sidewalk infill along Todd Road from Fourth Plain Boulevard to 18th Street.

Justification:
To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101190
Grant Funded:	Yes
Grant Amount:	$535,000
Total Project Cost:	$635,000
Start of Const. (year):	2026

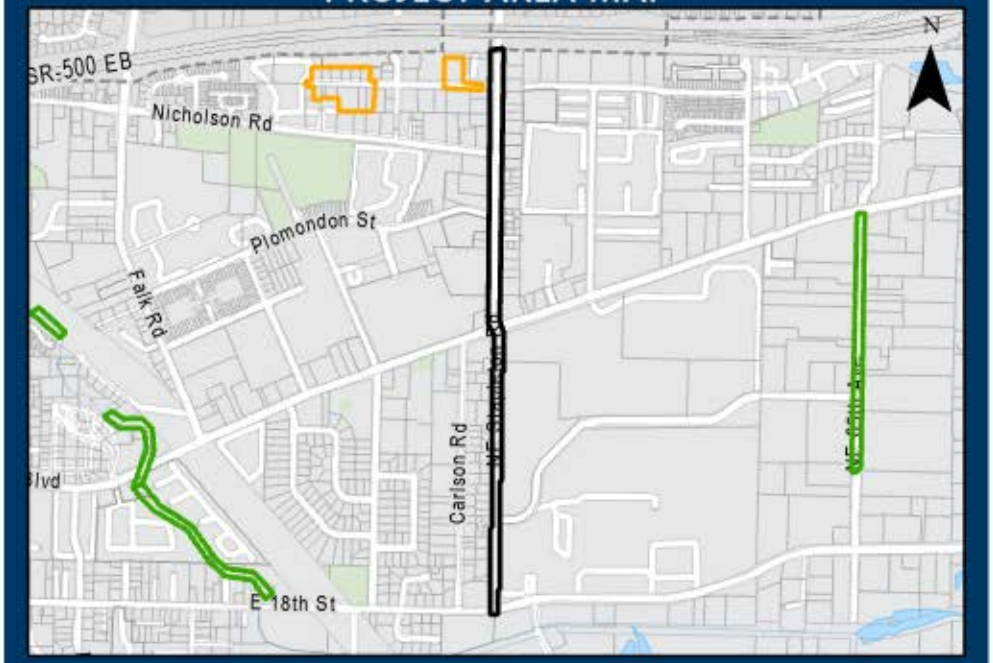
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

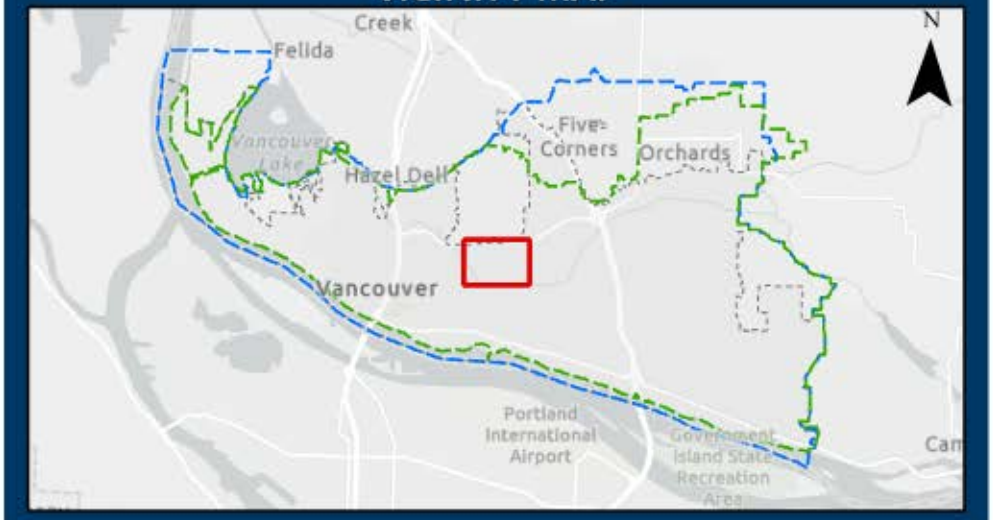
Project: Stapleton Road Mobility Improvements - State Route-500 to 18th Street (SS4A)

Project Extent: Fourth Plain Boulevard **To:** 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
Restripe Stapleton Road from State Route-500 to 18th Street to create a buffered mobility lanes in both north and sourthbound directions by eliminating existing vehicle center turn lane.

Justification:
To improve mobility access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number:	PRJ101190
Grant Funded:	Yes
Grant Amount:	$800,000
Total Project Cost:	$1,000,000
Start of Const. (year):	2026

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

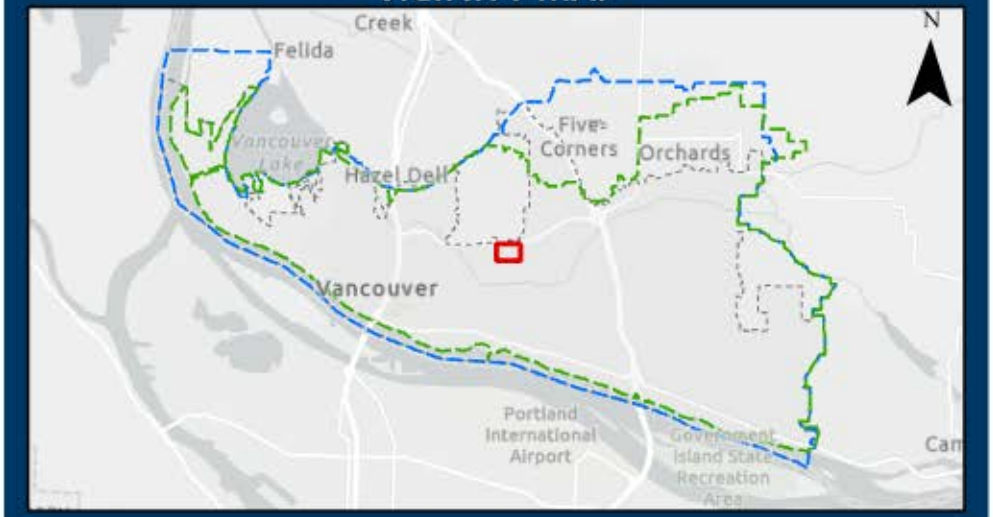
Project: 34th Street Sidewalk Connection (SS4A)

Project Extent: Fourth Plain Boulevard **To:** Northeast 34th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
New north-south pedestrian access between Fourth Plain Boulevard and Northeast 34th Street (within Northeast 57th Avenue and Northeast 62nd Avenue). Exact location have not yet been determined.

Justification:
To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101190

Grant Funded: Yes

Grant Amount: $335,000

Total Project Cost: $435,000

Start of Const. (year): 2027

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

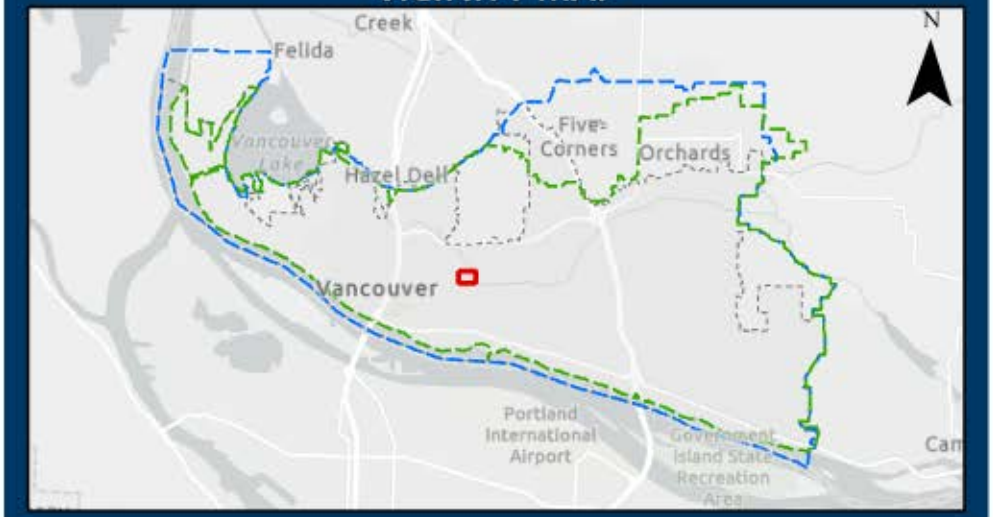
Project: Brandt Road Traffic Calming - Fourth Plain Boulevard to East 18th Street

Project Extent: Fourth Plain Boulevard **To:** East 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install traffic calming treatments on Brandt Road to improve safety for users. Improve safety and visibility of mobility lanes by restriping where needed and refreshing bicycle road markings. (Outside 6-year horizon)

Justification:
To improve safety and mobility access. Originated from the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $100,000

Start of Const. (year): Unknown

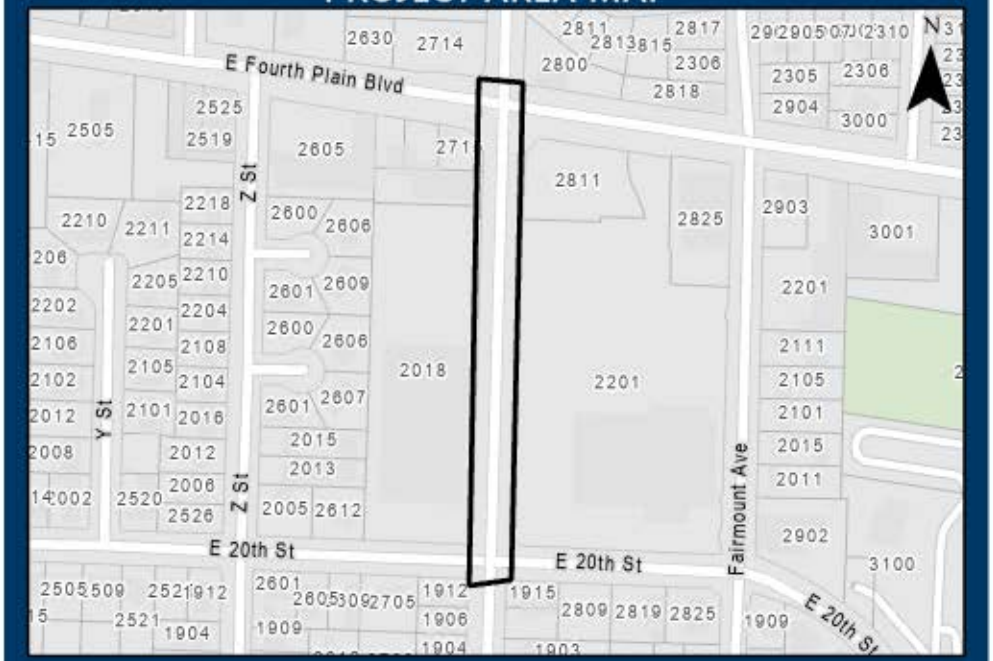
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

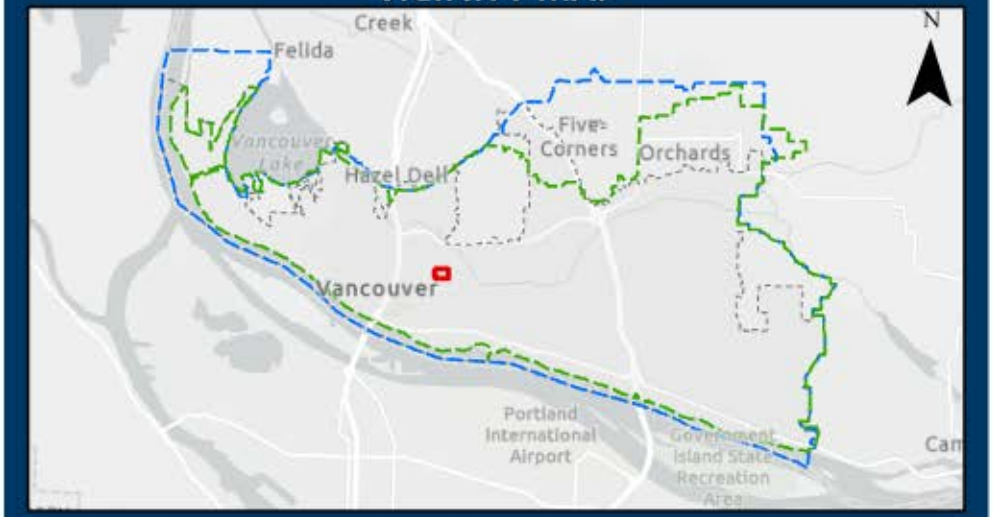
Project: North Grand Boulevard Traffic Calming - Fourth Plain Boulevard to East 18th Street

Project Extent: Fourth Plain Boulevard **To:** East 18th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
Install traffic calming treatments on Grand Boulevard to improve safety for users. (Outside 6-year horizon)

Justification:
To improve safety and mobility access. Originated from the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $100,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Safe Routes to School

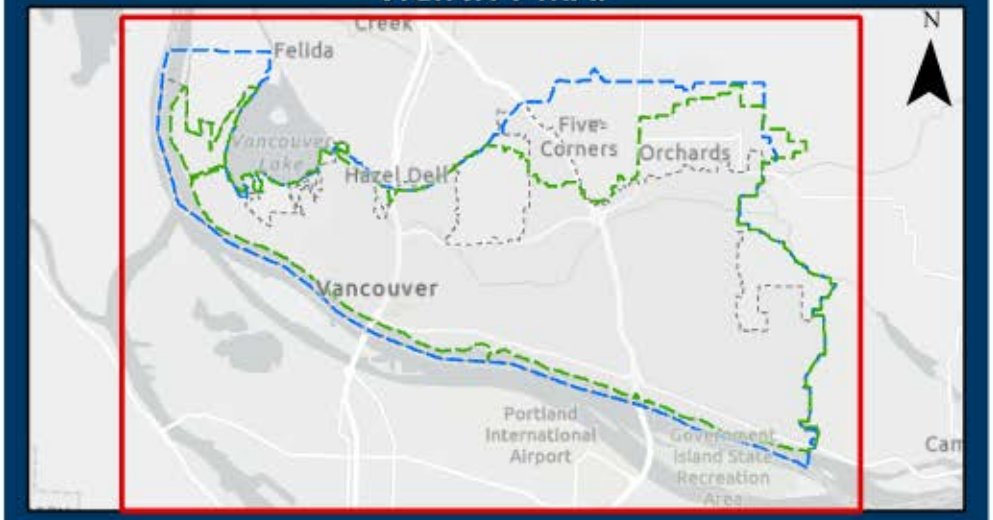
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
New program implemented Citywide in 2025. Work with schools to analyze school walking routes, gaps and safety issues to develop safe route projects. Program budget $200,000 per year.

Justification:
Develop safety and education programs in partnership with schools, neighbors, community organizations and agencies to increase safety and improve health for students and their families.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: City Safety Program

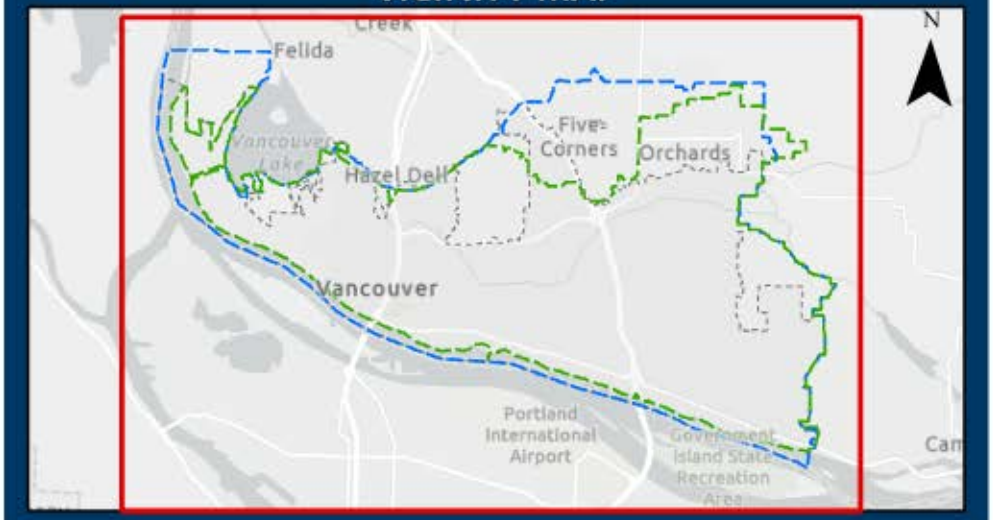
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New program to be implemented Citywide. Provide resources to develop a comprehensive City safety program, which would include: management of the citywide collision dashboard, regular review of safety data and design of rapid response projects, response to collision hotspots identified through the Local Road Safety Plan, and high collision corridor. Program budget to be determined.

Justification:
To improve overall traffic safety by identifing patterns and high collusions areas, then ulitmately resulting in future TIP projects to resolve these issues.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Lighting for Pedestrian Safety Program

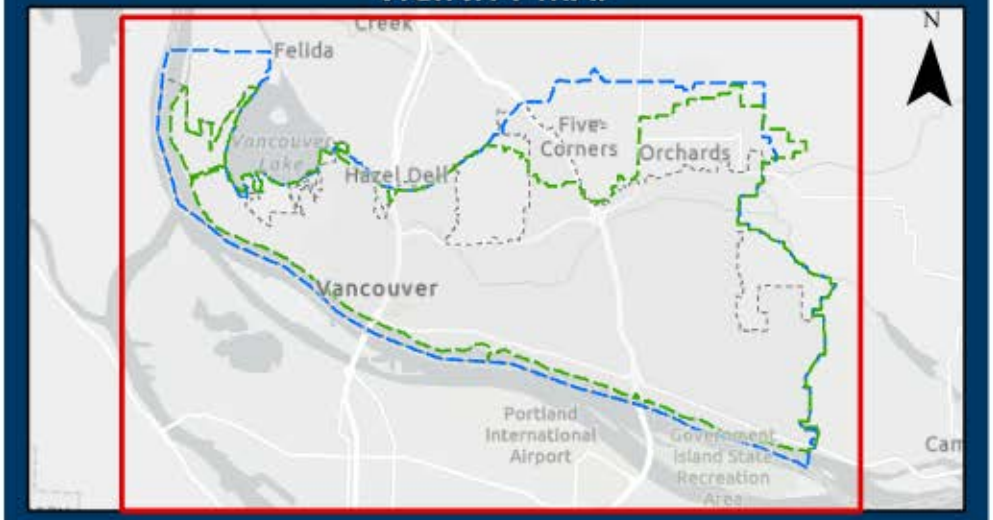
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New program to be implemented Citywide. Create GIS inventory of high-need locations based on pedestrian activity, locations of mid-block enhanced pedestrian crossings, locations that need additional crossings/lighting, high ridership bus stops, roadway characteristics, and crash data. Develop policy to prioritize installation and incorporate into development review. Program budget to be determined.

Justification:
To improve pedestrian safety by identifing patterns and high need areas, then ulitmately resulting in future TIP projects to resolve these issues.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Automated Enforcement Program

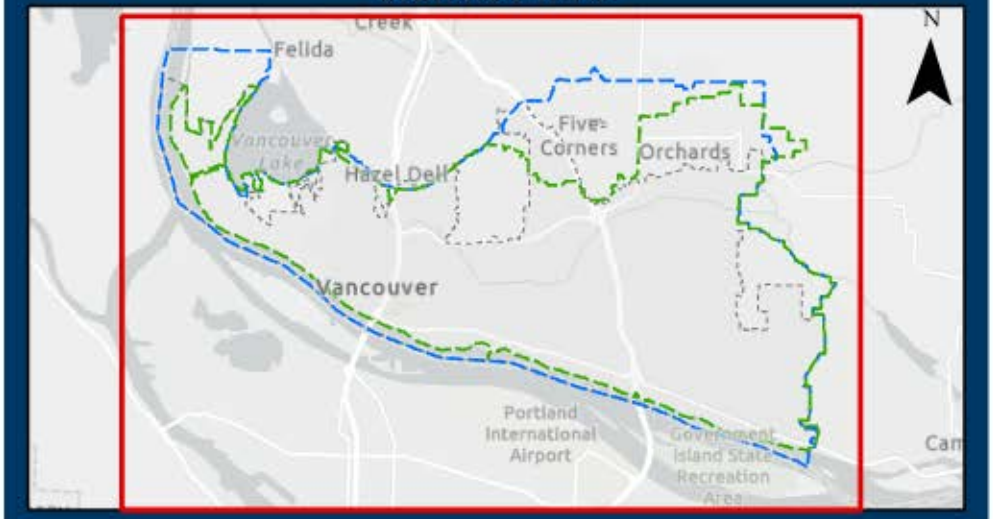
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New program to be implemented Citywide. Develop program, community outreach, pilot testing, coordinate with Vancouver Police Department, and address equity considerations. Program budget to be determined.

Justification:
Included in TSP and now enabled for expanded use at state level.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Pedestrian/Bike/Small Mobility Wayfinding Program

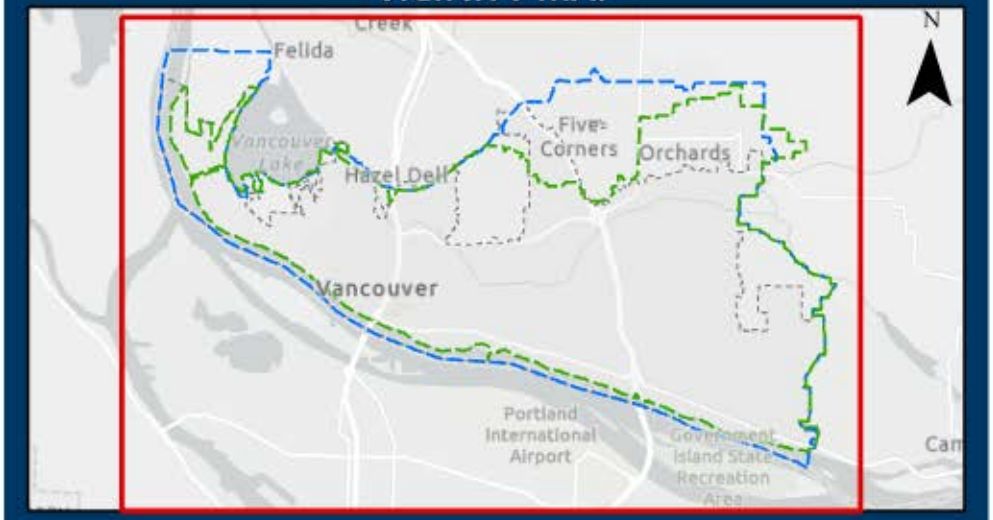
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
New program to be implemented Citywide. Program budget to be determined.

Justification:
To improve pedestrian safety and mobility access.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Unknown

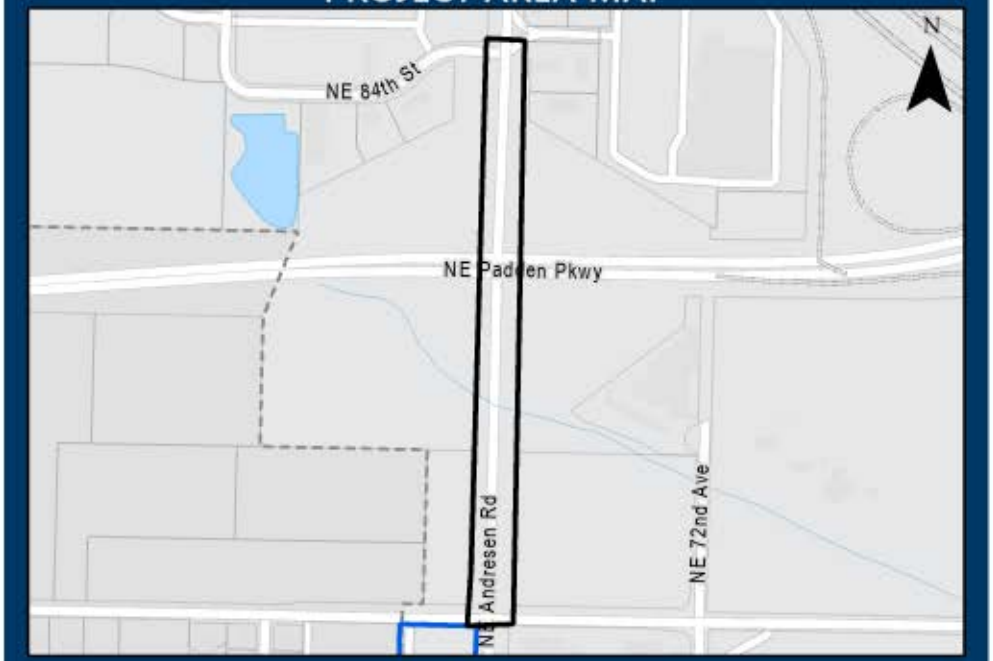
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

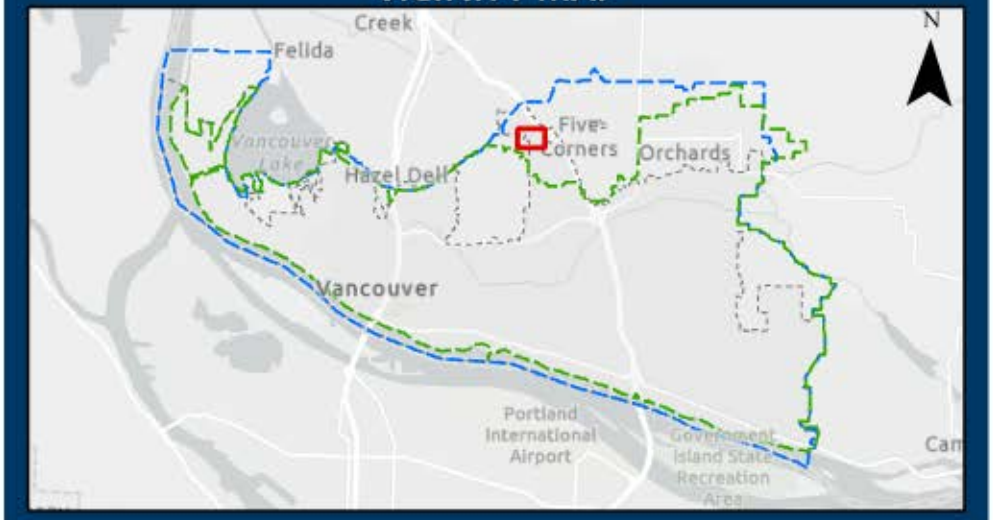
Project: Northeast Andresen Road Sidewalk - Northeast 78th Street to Northeast 84th Street

Project Extent: Northeast 78th Street **To:** Northeast 84th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This project includes new sidewalk and mobility improvements along Northeast Andresen Road from Northeast 78th Street to Northeast 84th Street. (Outside 6-year horizon).

Justification:
To improve pedestrian safety and mobility access. Identified by staff and public.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,000,000

Start of Const. (year): Unknown

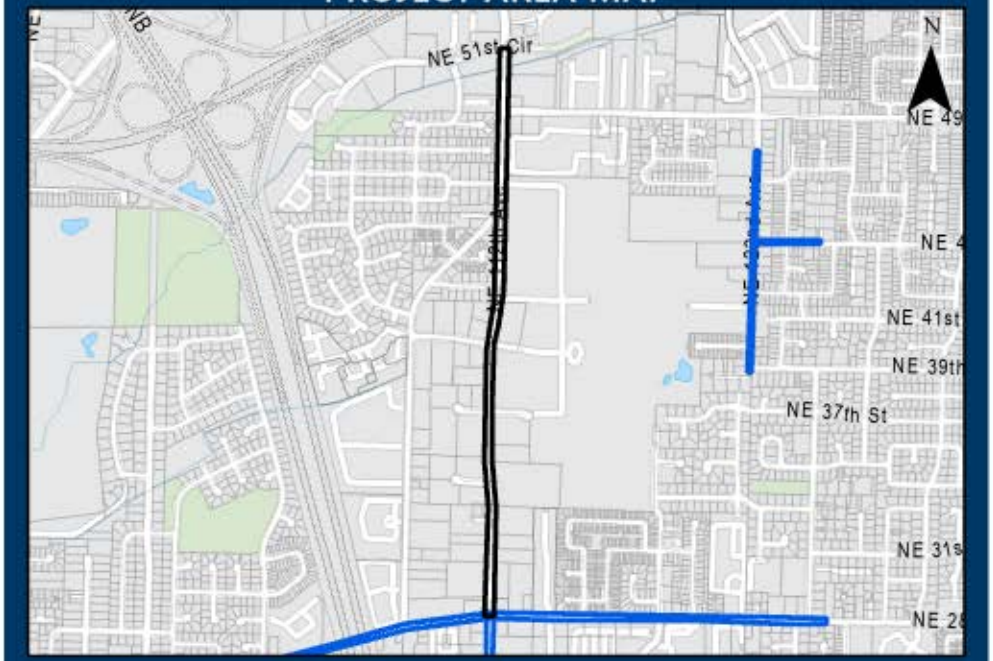
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

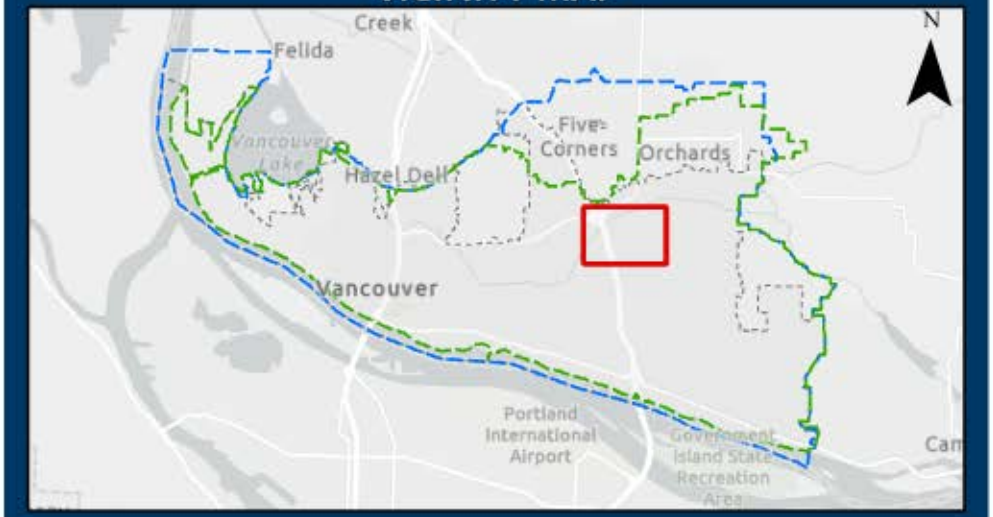
Project: 112th Avenue/Chkalov Drive Complete Street and Paving Project - Northeast 28th Street to Northeast 51st Street

Project Extent: Northeast 28th Street **To:** Northeast 51st Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
The Northeast 112th Avenue Complete Street Project between 28th Street and 51st Street will repave and restripe to add standard bicycle and small mobility lane. Configure alternate route Neighborhood Greenway with traffic calming treatments, and wayfinding signage. Shared lane markings between: 106th and 110th Avenue, Morrow Road, Four Seasons Lane, and two-way 12 foot shared use path one east side between 18th and 51st Streets (long term).

Justification:
The Northeast 112th Avenue Complete Street Project will explore a major street retrofit on 112th Avenue between 28th Street and 51st Street, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $3,975,000

Start of Const. (year): 2028

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

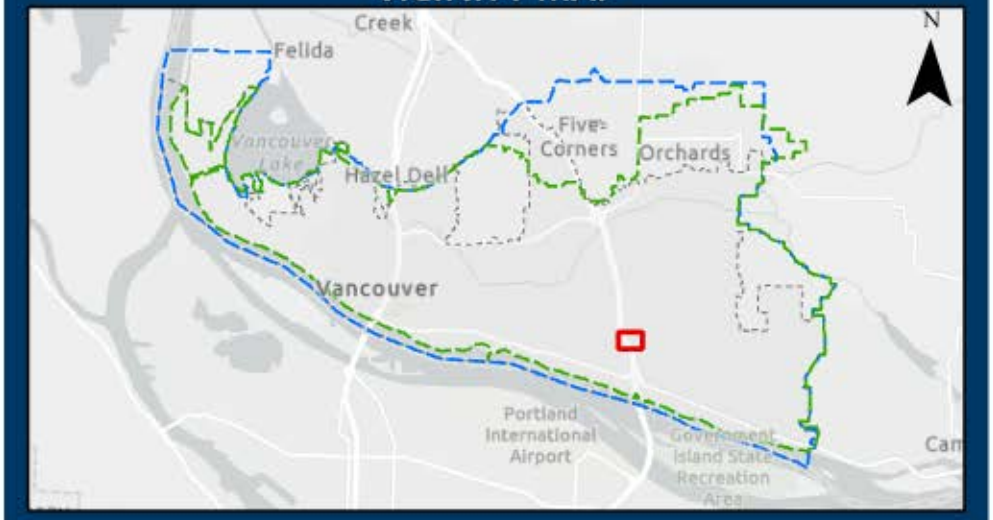
Project: 112th Avenue/Chkalov Drive Complete Street Project - Southeast 3rd Street to McGillivray Boulevard

Project Extent: Southeast 3rd Street **To:** Southeast McGillivray Boulevard

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The project will include road reconfiguration, protected bike and small mobility lane, pavement markings, signage, traffic signal modification, enhanced pedestrian crossing, ADA ramps.

Justification:
The Northeast 112th Avenue Complete Street Project will explore a major street retrofit on 112th Avenue between Southeast 3rd Street and McGillivray Boulevard, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,300,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

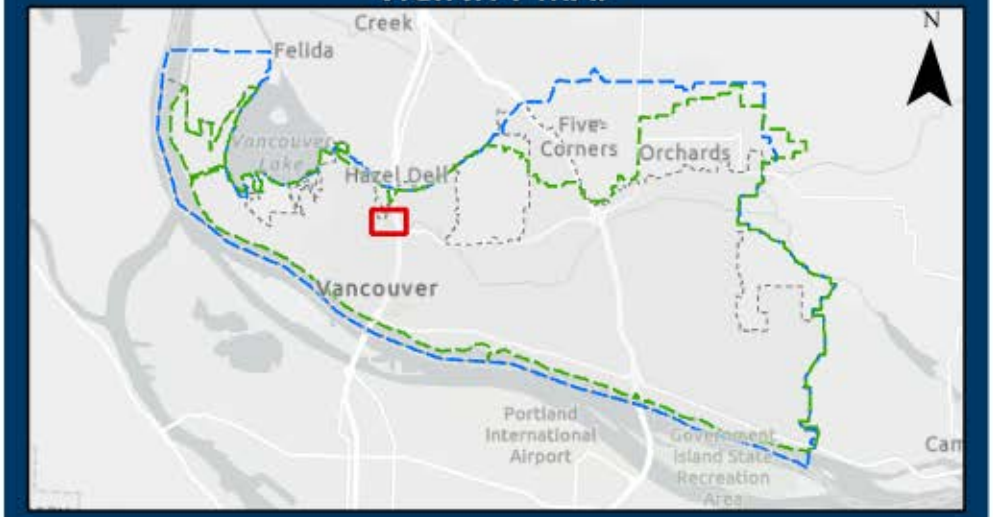
Project: Upper Main Street Complete Street and Paving Project - East 39th to Northeast 45th Street/Hazel Dell

Project Extent: East 39th Street **To:** Northeast 45th Street/Hazel Dell

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Funded

PROJECT

Description:
The Upper Main Street Complete Street Project between 37th Street to City Limits will repave and restripe. Strategic improvements are incorporated throughout the length of the project and they include: curb ramp upgrades, a southbound mobility lane between 39th and 40th Streets, a two way bikeway between 40th and the Covington House driveway exit, a multiuse path between the Covington House driveway and 45th Street, new marked crossings, a RRFB beacon and median island at 39th and F Street, shared lane markings along F Street between 39th and 40th Street, new marked crossings at 40th and F Street and removal of a northbound travel lane and widen other travel lanes to accommodate buses. Improvements to be coordinated with C-TRAN Highway 99 BRT project.

Justification:
Improving safety, mobility, and providing additional modal choices for road users. Identifed by staff.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number:	PRJ101097
Grant Funded:	Yes
Grant Amount:	$1,500,000
Total Project Cost:	$4,000,000
Start of Const. (year):	2026

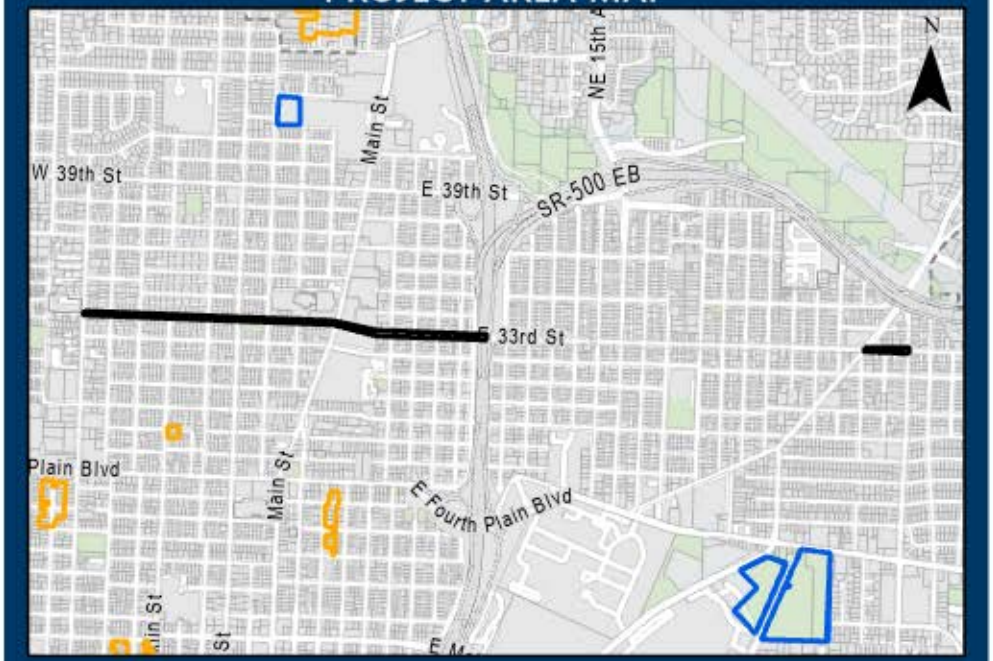
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

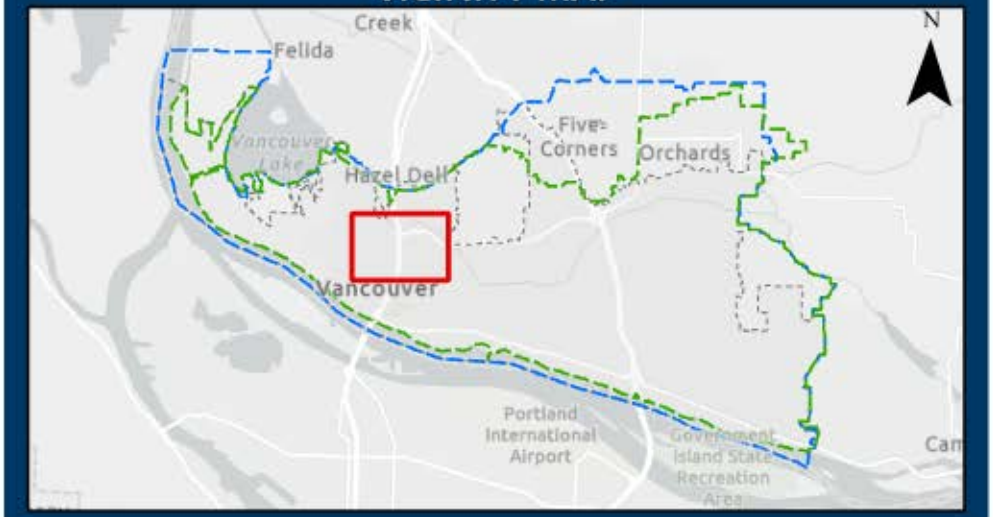
Project: East 33rd Street Complete Street & Paving Project - I-5 to Kauffman Avenue and Saint Johns Boulevard to Grand Boulevard

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The East 33rd Street Complete Street Project is between Interstate-5 overpass to Kauffman Avenue and Saint Johns Boulevard to Grand Boulevard will repave and restripe. Improvements will include: lower speed limits, remove on street parking east of Main Street except for the north side of 33rd Street between Main and F Street and add buffered mobility lanes, remove median island at F Street and add RRFB beacon with a raised crossing or speed cushions approaching the crossing, intersection improvements at 33rd and Grand, and add speed humps and shared lane markings between Kauffman and Main Street. Consider removing on street parking and adding buffered mobility lanes between Main and Columbia based on traffic volumes and speeds.

Justification:
This project will explore major mobility improvements and complete streets retrofits as there are well documented safety issues and vulnerable street users. This will be a combined efforts with East 29th Street Complete Street Project. Identified by staff and recommended by the Transportation and Mobility Commission.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,000,000

Start of Const. (year): Unknown

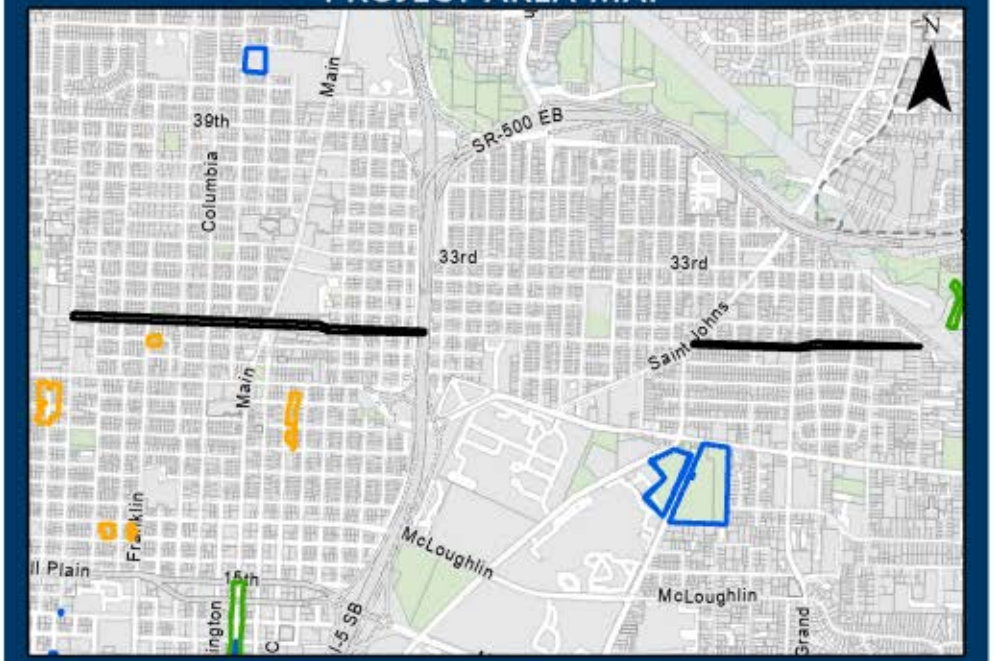
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

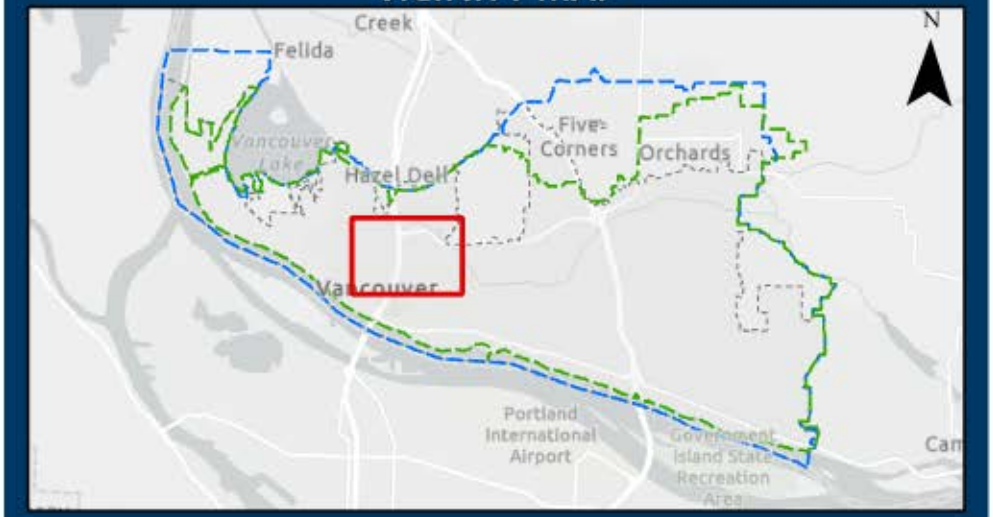
Project: East 29th Street Complete Street and Paving Project - I-5 to Kauffman Avenue and Saint Johns Boulevard to Neals Lane

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The East 29th Street Complete Street and Paving Project between Interstate-5 overpass to Kauffman and Saint Johns Boulevard to Neals will lower speed limit. Add speed cushions and shared lane markings. Improve crossing at Grand Boulevard with pedestrian island and bicycle crossing. Install traffic circles at Franklin, F and Z Streets and Watson Ave. Fill sidewalk gaps east of X Street. Remove on street parking at intersection corners of Columbia and Kauffman. Add wayfinding signage for people walking, rolling and biking.

Justification:
This project will explore major mobility improvements and complete streets retrofits as there are well documented safety issues and vulnerable street users. This will be a combined efforts with East 33rd Street Complete Street Project. Identified by staff and recommended by the Transportation and Mobility Commission.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $700,000

Start of Const. (year): Unknown

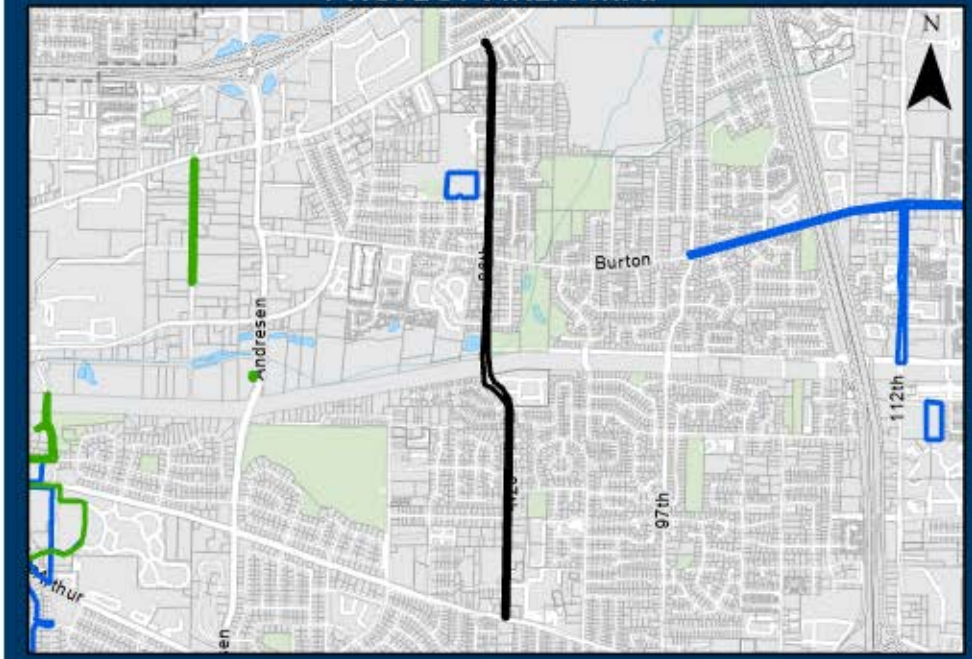
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

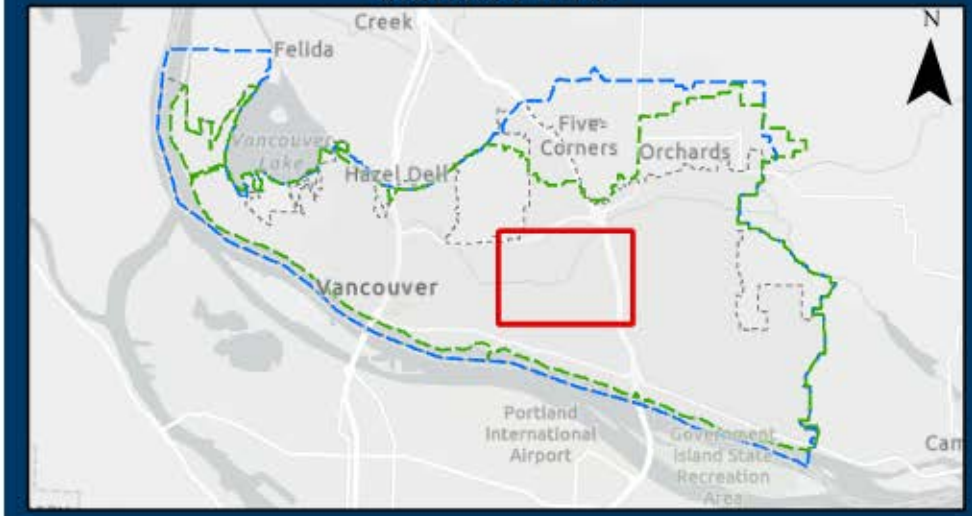
Project: Northeast 86th/Northeast 87th Avenues Safety and Mobility Complete Street

Project Extent: Fourth Plain Boulevard **To:** Mill Plain Boulevard

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Safety and Mobility planning project in coordination with planned pavement preservation work at Northeast 86th/87th Avenue from Fourth Plain Boulevard to Mill Plain Boulevard.

Justification:
Improving safety, mobility, and providing additional modal choices for road users.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101087

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,100,000

Start of Const. (year): 2027

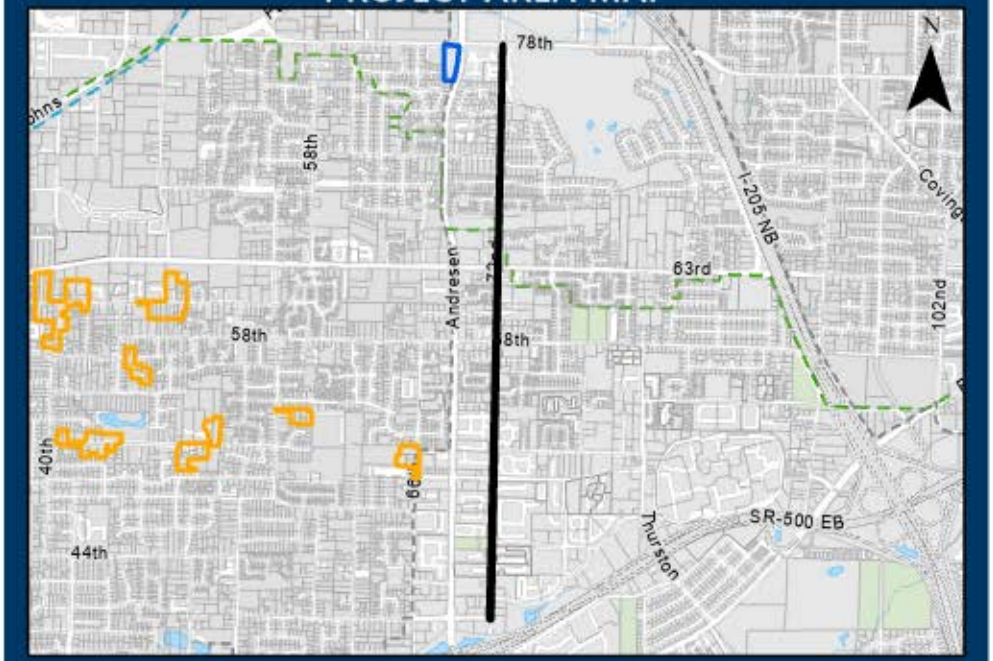
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

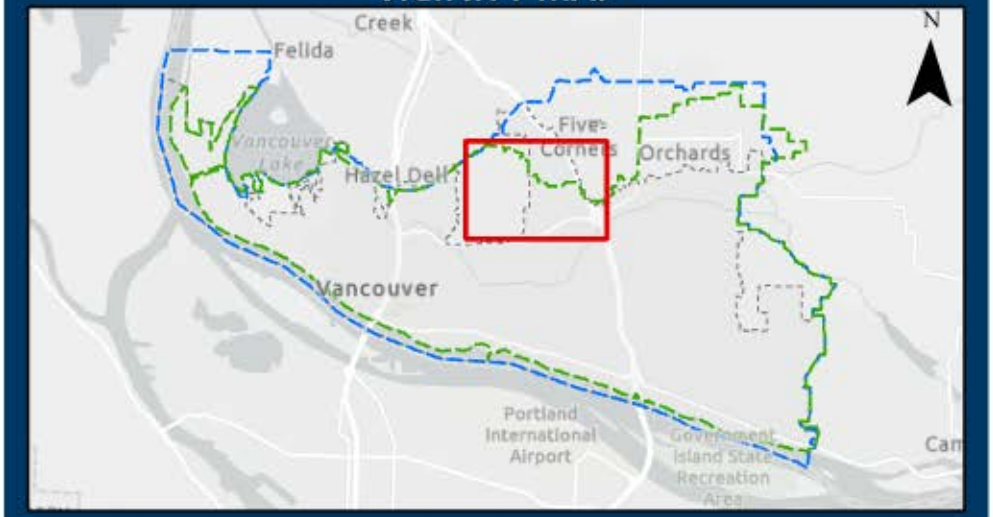
Project: Northeast 72nd Avenue Safety and Mobility Complete Street

Project Extent: Northeast 40th Street **To:** Northeast 78th Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Safety and Mobility planning project in coordination with planned pavement preservation work at Northeast 72nd Avenue from Northeast 40th Street to Northeast 78th Street.

Justification:
Improving safety, mobility, and providing additional modal choices for road users.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101088

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,500,000

Start of Const. (year): 2027

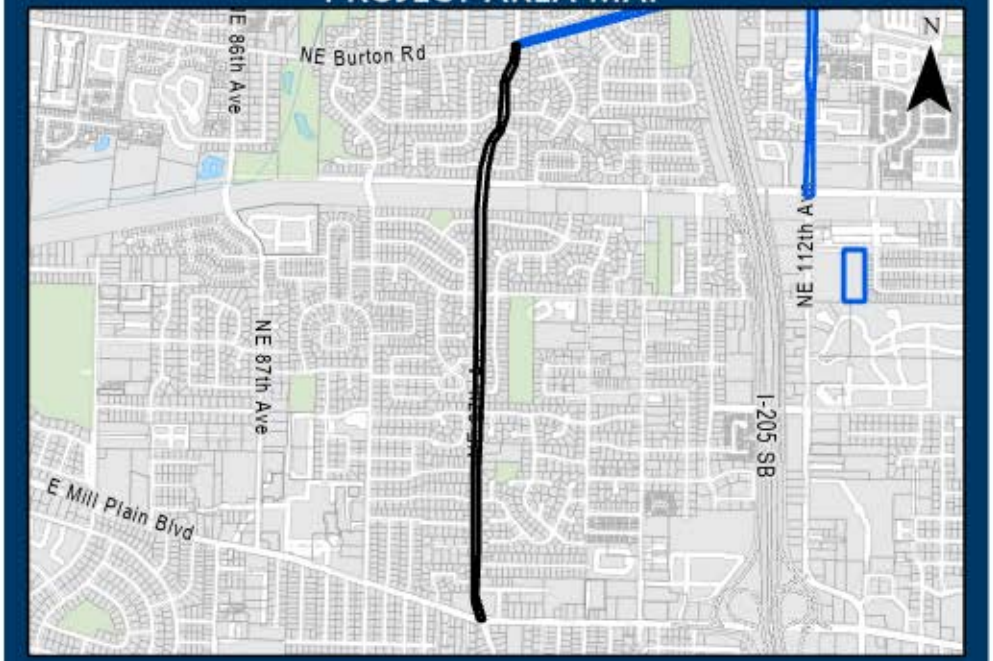
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

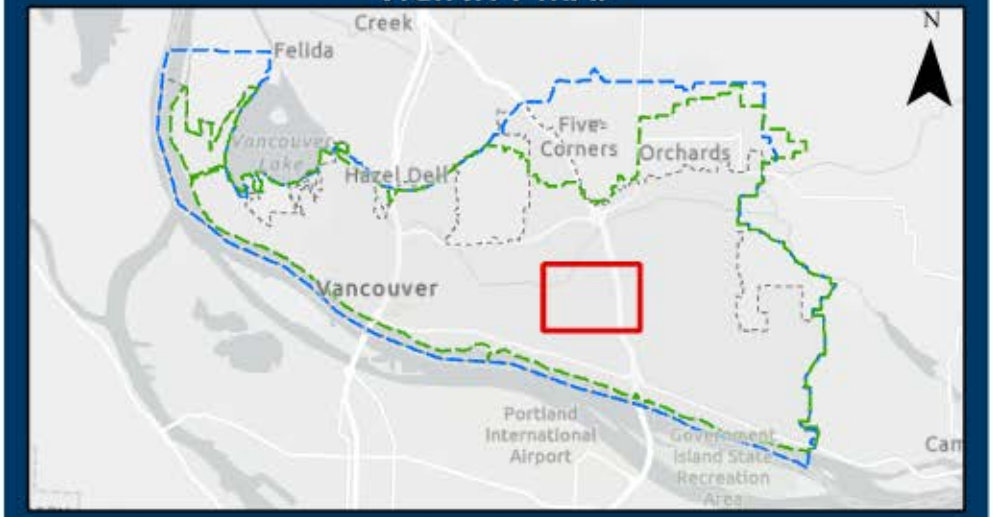
Project: Northeast 97th/98th Avenues Safety and Mobility Complete Street

Project Extent: Northest Burton Road **To:** Mill Plain Boulevard

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Safety and Mobility planning project in coordination with planned pavement preservation work at Northeast 97th/98th Avenue from Northeast Burton Road to Mill Plain Boulevard.

Justification:
Improving safety, mobility, and providing additional modal choices for road users.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101089

Grant Funded: No

Grant Amount: $

Total Project Cost: $1,700,000

Start of Const. (year): 2027

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Curb Ramps Retrofits

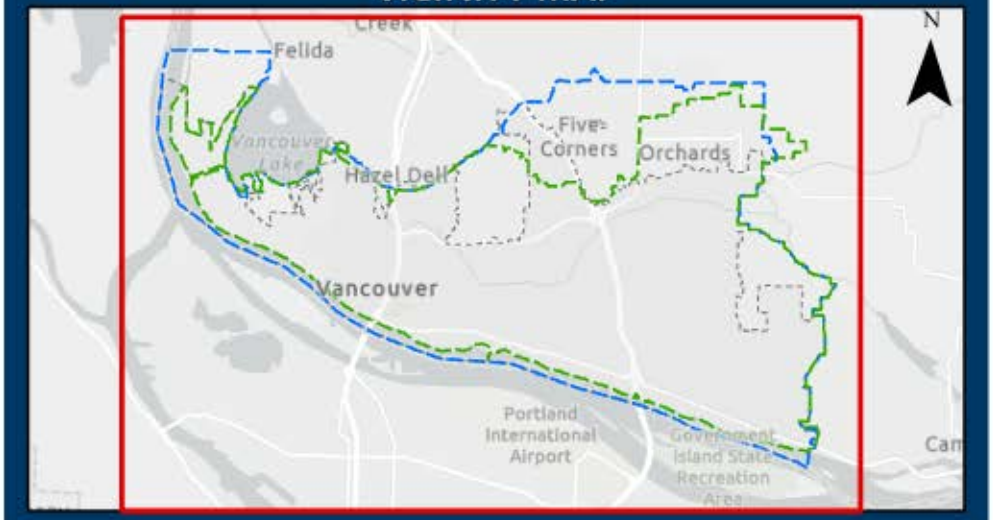
Project Extent: Citywide

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Program
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
New program to be implemented Citywide. This program will help retrofit curb ramps to meet current standards. Program budget $2.5M per year.

Justification:
To improve pedestrian safety and access.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: PRJ101287

Grant Funded: No

Grant Amount: $

Total Project Cost: $

Start of Const. (year): Ongoing

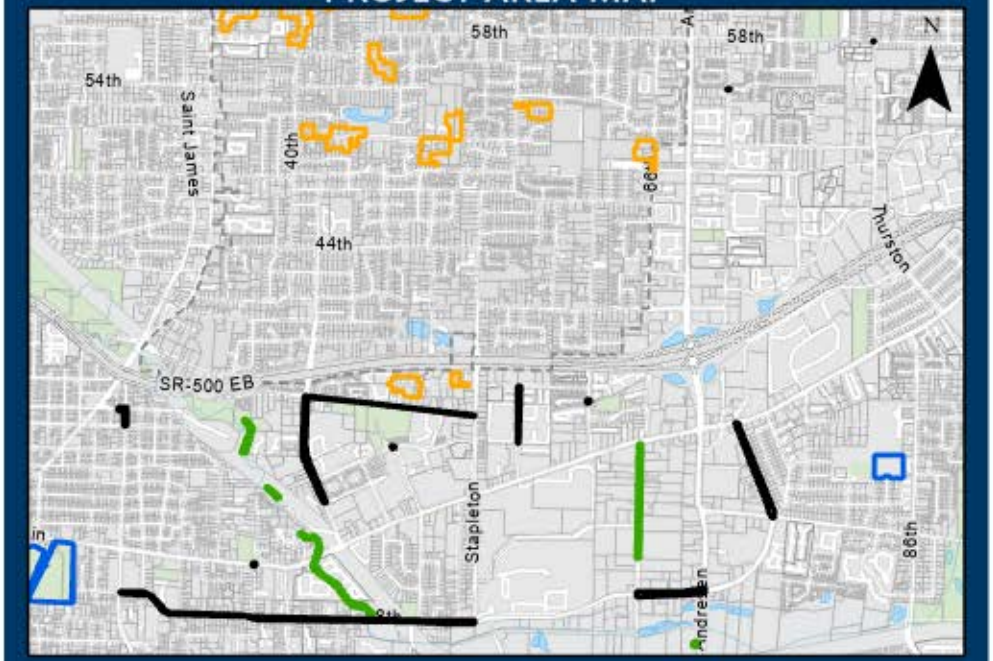
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

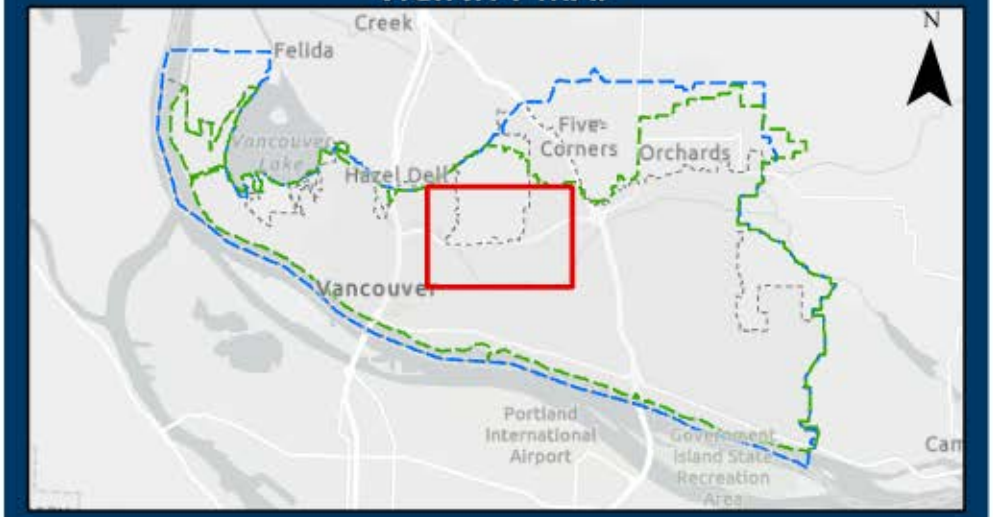
Project: Fourth Plain for All (ARPA)

Project Extent: To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Active
Funding Status:	Funded

PROJECT

Description:
The Fourth Plain for All transportation investment ($4.2 million, federal funds ARPA) will improve safety by providing traffic calming on neighborhood streets, lighting, and pedestrian infrastructure on neighborhood streets.

Justification:
This project is a community-driven process to identify, prioritize, and implement a community vision that will improve conditions and expand opportunities for central Vancouver neighborhoods. This project seeks to address impacts from COVID-19 as well as long-standing disparities to foster a more prosperous and resilient community that thrives into the future.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: Varies

Grant Funded: Yes

Grant Amount: $4,000,000

Total Project Cost: $4,250,000

Start of Const. (year): 2026

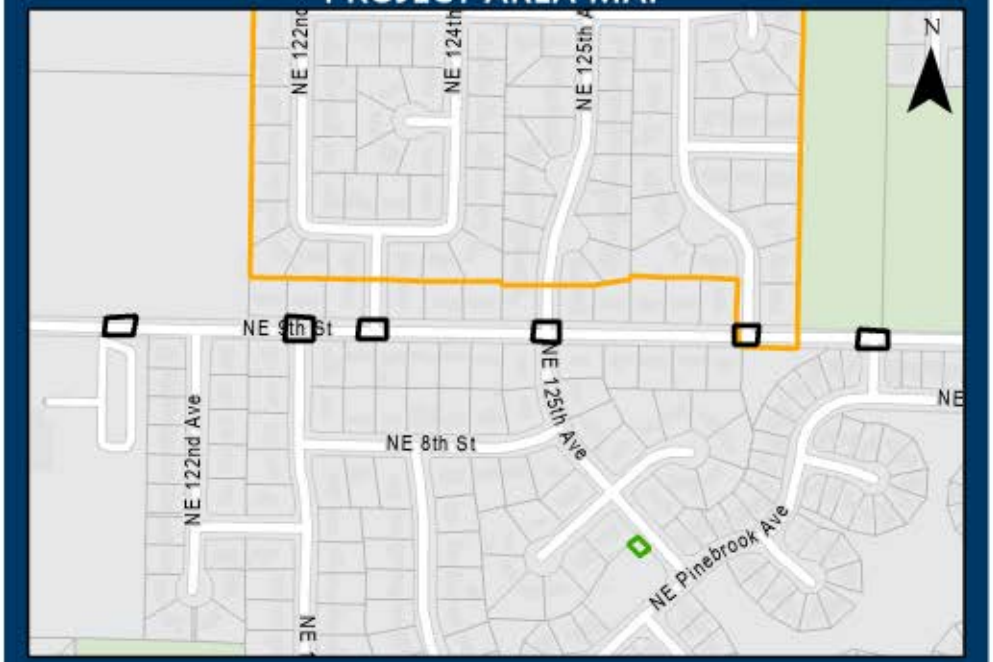
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

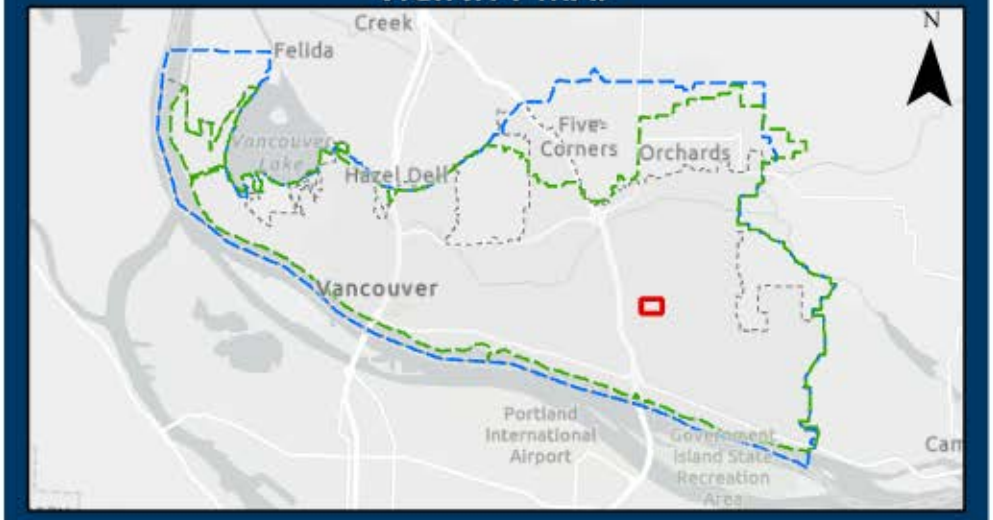
Project: 9th Street Illumination Project

Project Extent: Fircrest Elementary **To:** Northeast 128th Avenue

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This project will add illumination to the marked crosswalk along Northeast 9th Street at the following locations: across from Fircrest Elementary, 123rd Avenue, 125th Avenue, 127th Avenue, and 128th Avenue. This project is developer funded.

Justification:
Improve pedestrian safety and mobility access.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: PRJ101033

Grant Funded: No

Grant Amount: $

Total Project Cost: $225,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

Project: Mill Plain and Devine Intersection Improvements

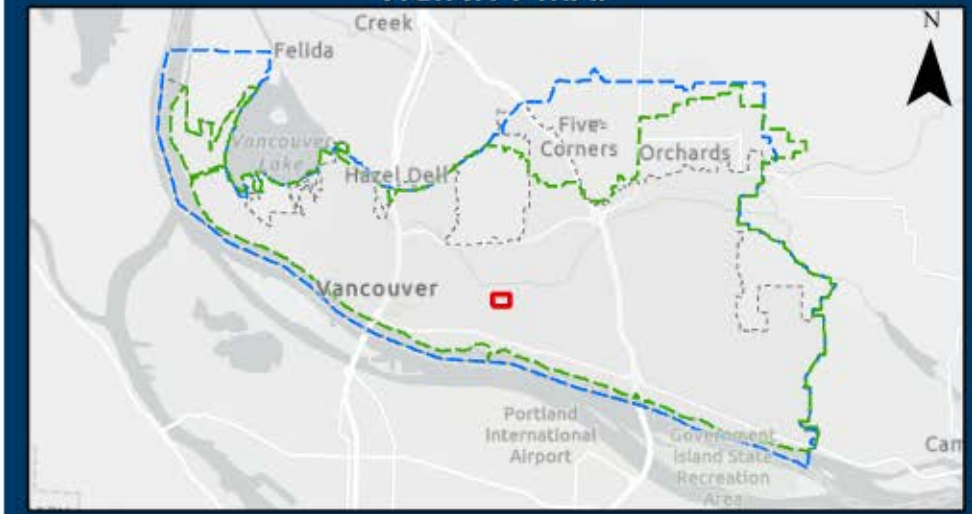
Project Extent:

To:

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Arterial Improvements
Project Status:	Future
Funding Status:	Partially Funded

PROJECT

Description:
Heights District Plan recommneded roadway changes to improve safety and support multi-modal mobility. Improvements are along Devine Road from south of Mill Plain Boulevard to Idaho Street and along Mill Plain Boulevard from Blanford Drive to about 200 feet east of Devine Road.

Justification:
Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: PRJ101231

Grant Funded: No

Grant Amount: $

Total Project Cost: $6,250,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

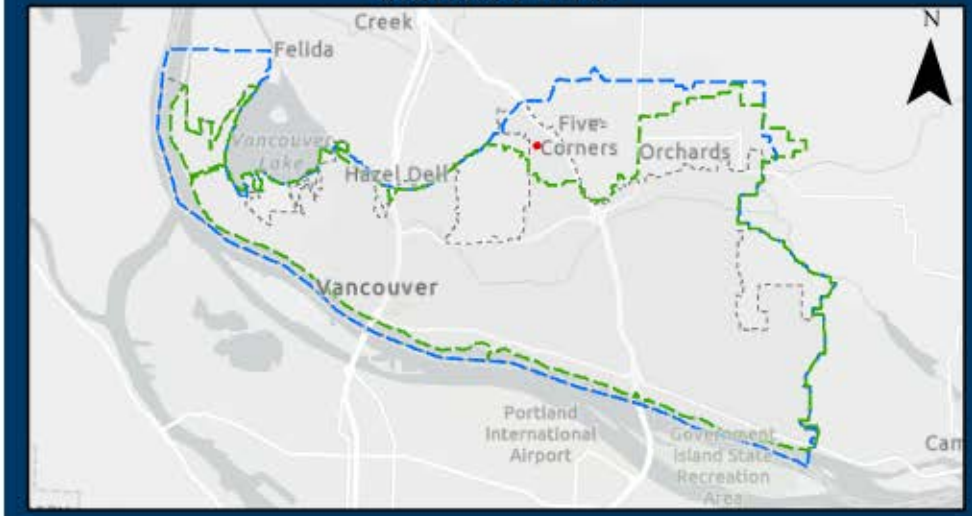
Project: Northeast 78th Street and Northeast 72nd Avenue Intersection Improvements

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Signal & Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This project consist of a new stop controlled device at the intersection of Northeast 78th Street and Northeast 72nd Avenue. Analysis to be conducted to determine stop control device (all-way stop or signal).

Justification:
Improving safety and mobility. Identified by resident and staff.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $500,000

Start of Const. (year): Unknown

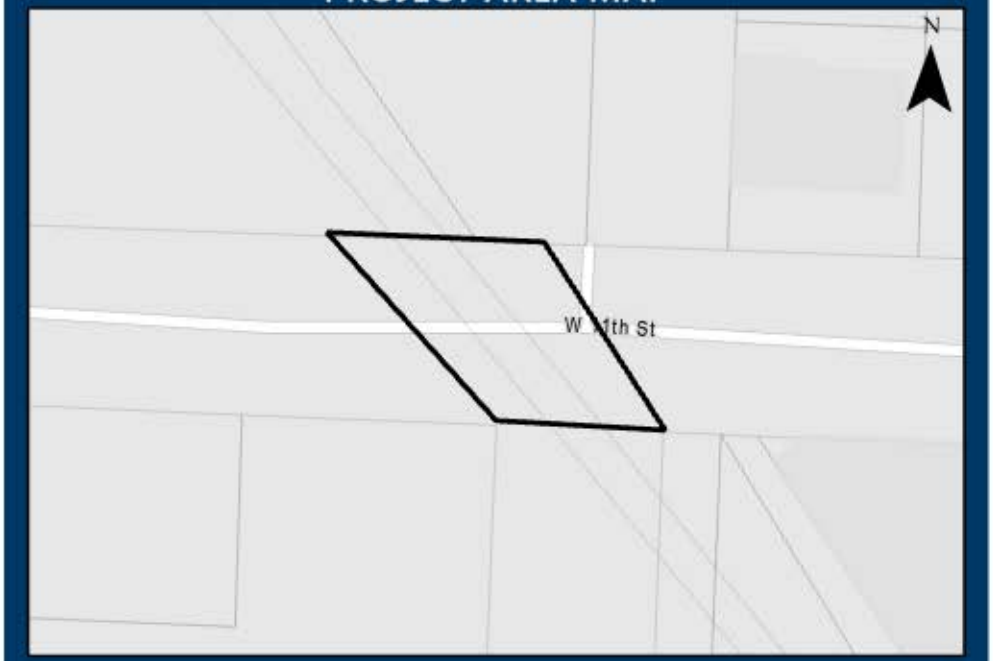
*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

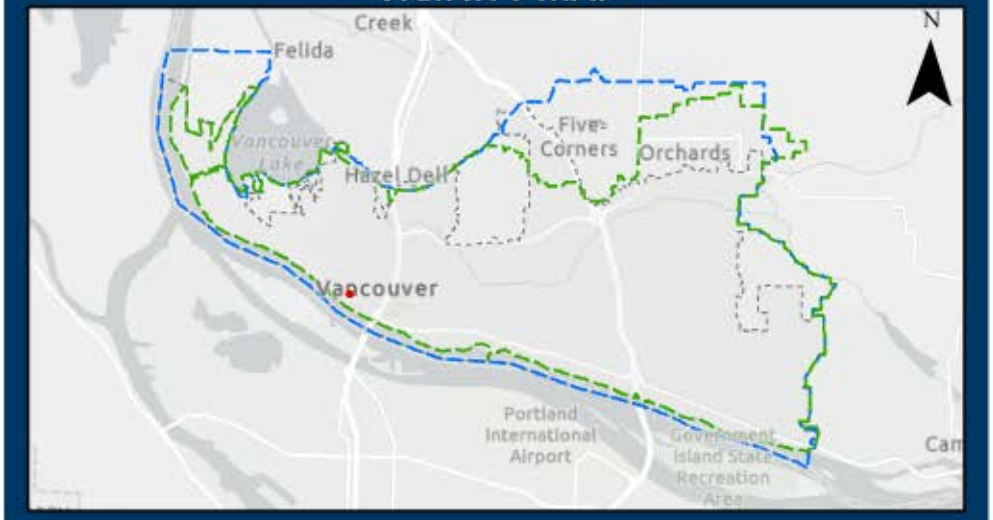
Project: West 11th Street/BNSF Crossing Grade Separation Project

Project Extent: **To:**

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This project will provide a multimodal grade separation access across rail crossing at West 11th Street to further increase safety.

Justification:
Improving safety and mobility. Identified by staff.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $2,500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

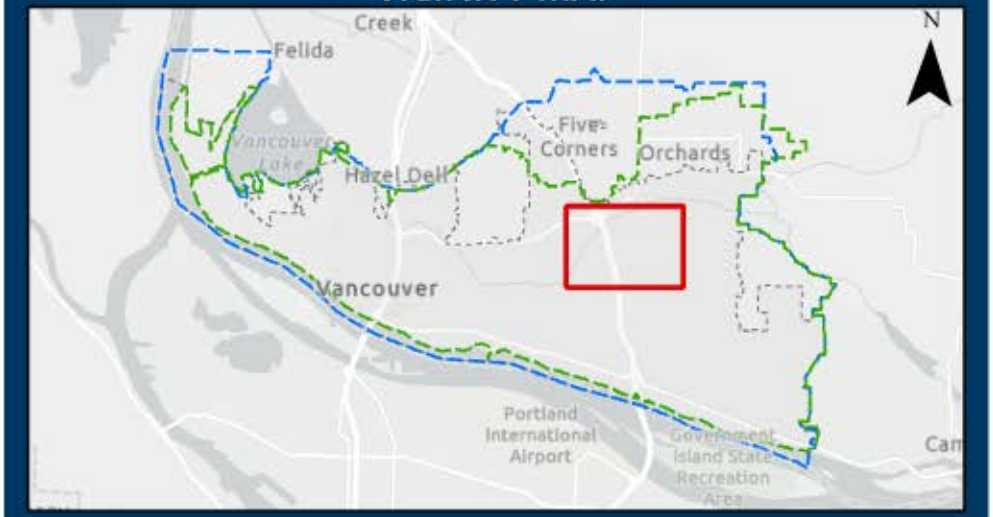
Project: Northeast 112th Avenue Off Street Path – Northeast 18th Street to Northeast 51st Street

Project Extent: Northeast 18th Street **To:** Northeast 51st Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
This off street path project will provide multi modal access along the east side of Northeast 112th Avenue from Northeast 18th Street to 51st Street.

Justification:
Improving safety and mobility. Identified by staff.

Priority Score:
Funded, unfunded projects outside the 6-year horizon, and programs were not scored.

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits
- Project Area

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $8,500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

2027-2032 TRANSPORTATION IMPROVEMENT PROGRAM

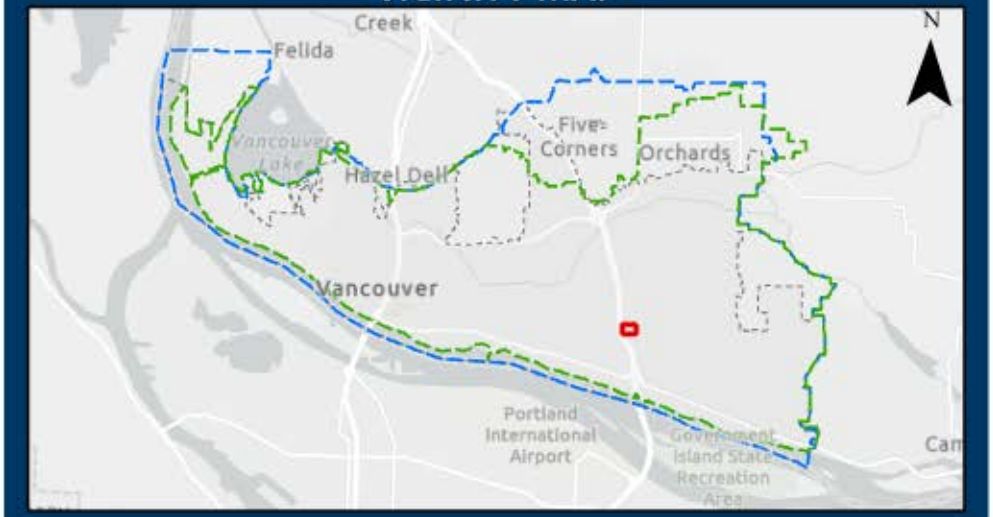
Project: Northeast 112th Avenue/Southeast Chkalov Drive Complete Street Project - Northeast 2nd Street to Southeast 3rd Street

Project Extent: Northeast 2nd Street **To:** Southeast 3rd Street

PROJECT AREA MAP



VICINITY MAP



PROJECT SUMMARY

Project Type:	Active Transportation
Project Status:	Future
Funding Status:	Unfunded

PROJECT

Description:
The Northeast 112th Avenue Complete Street Project between Northeast 2nd Street and Southeast 3rd Street. The project will include grading, walls, shared-use paths, ADA ramps, curb and gutter, traffic signal modification, pavement markings, signage, landscaping.

Justification:
The Northeast 112th Avenue Complete Street Project will explore a major street retrofit on 112th Avenue between Northeast 2nd Street and Southeast 3rd Street, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.

Priority Score:
Near-term

LEGEND

- Sanitary Sewer Projects
- Surface Water Projects
- Transportation Project
- Water Projects
- Project Area
- SCIP Projects
- Sewer Utility Service Boundary
- Water Utility Service Boundary
- City Limits

FUNDING & SCHEDULE

Project Number: TBD

Grant Funded: No

Grant Amount: $

Total Project Cost: $4,500,000

Start of Const. (year): Unknown

*All project timing will be dependent on coordination with other departments including streets, pavement management, wastewater, water, and surface water.
**Utility CIP projects (WTR-XXX, SS-XXX, SW-XXX, SCIP-XXX) can be found in the 6 Year Public Works Capital Improvement Plan (CIP) document.

Arterial Map Updates Section

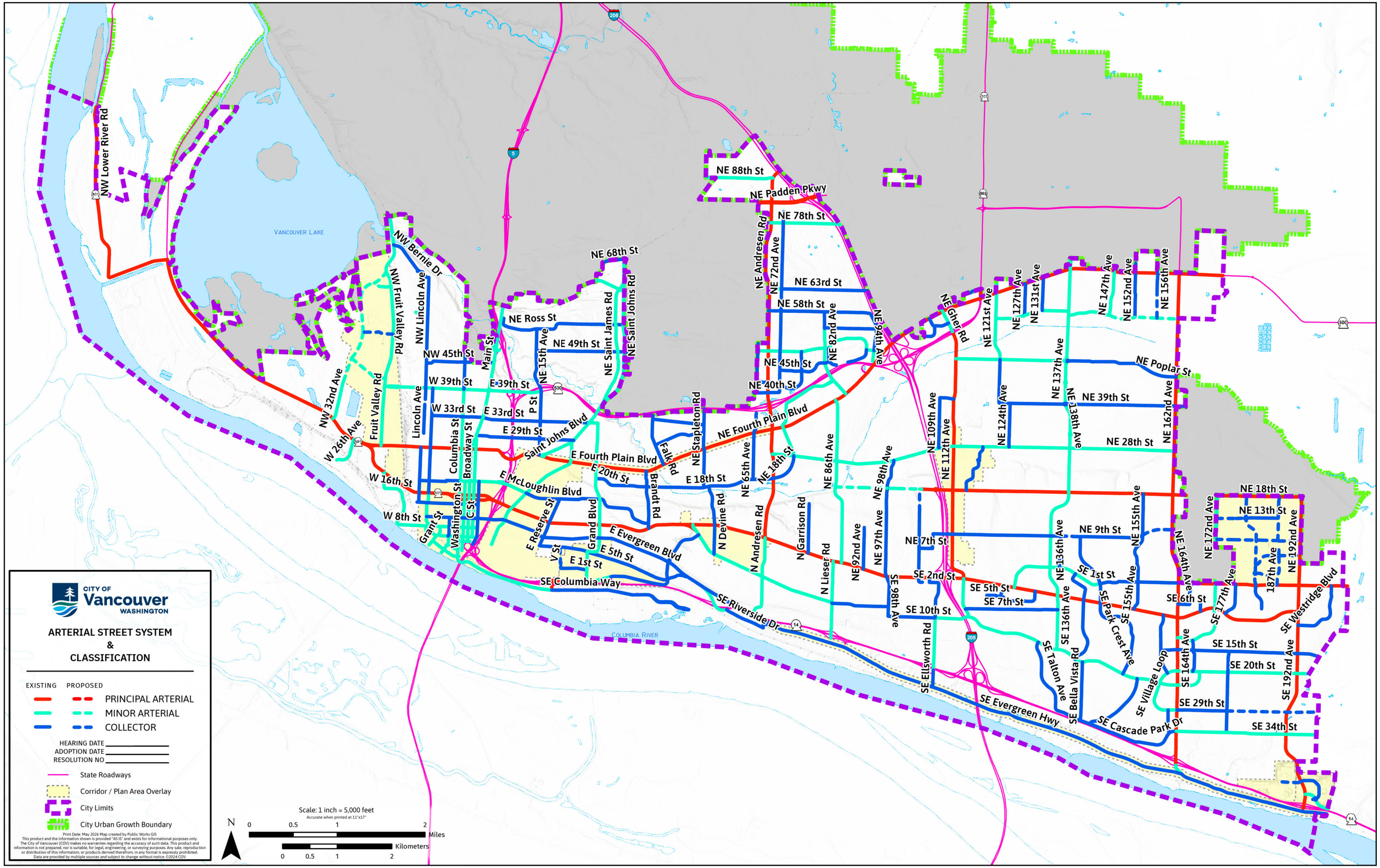


2027-2032 TIP Arterial Classification Updates

New Designation	Recommendations
None	

Redesignation	Recommendations
Main Street - McLoughlin Boulevard to City limits	Change from principal arterial to minor arterial, matching federal functional classifications (FFC) changes
Broadway Street - McLoughlin Boulevard to Main Street	Change from principal arterial to minor arterial, matching FFC changes
McLoughlin Boulevard - Columbia Street to C Street	Change from principal arterial to minor arterial, matching FFC changes
Washington Street - West 3rd Street to McLoughlin Boulevard	Change from principal arterial to minor arterial matching FFC changes
C Street - East 6th Street/State Route 14 off ramp to McLoughlin Boulevard	Change from principal arterial to collector, matching FFC changes
Northeast Saint Johns/Saint James – East 33rd Street to Northeast 68th Street	Change from principal arterial to minor arterial, matching FFC changes
Grand Boulevard - Fourth Plain Boulevard to Columbia House Boulevard	Change from principal arterial to minor arterial, matching FFC changes
Evergreen Boulevard - Columbia Street to State Route 14 off ramp	Change from minor arterial to collector, matching FFC changes
Northeast Stapleton Road - Fourth Plain Boulevard to State Route 500	Change from minor arterial to collector, matching FFC changes
East 18th Street - Northeast Andresen Road to Northeast Burton Road	Change from minor arterial to collector, matching FFC changes
Southeast 34th Street - Southeast 164th Avenue to City limits	Change from principal arterial to minor arterial, matching FFC changes
Northeast 97th/98th Avenue – Southeast Mill Plain Boulevard to Northeast Burton Road	Change from local road to collector due to error

Other	Recommendations
West Mill Plain Boulevard – Northwest 26th Avenue to Interstate-5	Added additional State Route 501 symbol to indicate the continuation of the route


VANCOUVER LAKE
COLUMBIA RIVER
NW Lower River Rd
NW Bernie Dr
NW Fruit Valley Rd
NW Lincoln Ave
NW 45th St
NW 32nd Ave
W 26th Ave
W 16th St
W 8th St
Fruit Valley Rd
Lincoln Ave
Columbia St
Broadway St
Washington St
C St
Grant St
Main St
NE Ross St
NE 49th St
NE 15th Ave
W 39th St
E 39th St
W 33rd St
E 33rd St
P St
E 29th St
Saint Johns Blvd
E Fourth Plain Blvd
E 20th St
E McLoughlin Blvd
E Reserve St
V St
Grand Blvd
Brandt Rd
E Evergreen Blvd
E 5th St
E 1st St
SE Columbia Way
SE Riverside Dr
NE 68th St
NE Saint James Rd
NE Saint Johns Rd
NE Stapleton Rd
Falks Rd
E 18th St
N Devine Rd
NE 65th Ave
NE 18th St
N Andresen Rd
N Garrison Rd
N Lieser Rd
NE 92nd Ave
NE 97th Ave
SE 98th Ave
NE 88th St
NE Padden Pkwy
NE 78th St
NE Andresen Rd
NE 72nd Ave
NE 63rd St
NE 58th St
NE 82nd Ave
NE 45th St
NE 40th St
NE 94th Ave
NE Fourth Plain Blvd
NE Cherry Rd
NE 109th Ave
NE 112th Ave
NE 121st Ave
NE 124th Ave
NE 127th Ave
NE 131st Ave
NE 136th Ave
NE 137th Ave
NE 139th Ave
NE 147th Ave
NE 152nd Ave
NE 156th Ave
NE Poplar St
NE 39th St
NE 28th St
NE 162nd Ave
NE 155th Ave
NE 9th St
NE 7th St
NE 18th St
NE 13th St
NE 172nd Ave
NE 192nd Ave
187th Ave
SE 2nd St
SE 5th St
SE 7th St
SE 10th St
SE 1st St
SE 6th St
SE 177th Ave
SE Westridge Blvd
SE Park Crest Ave
SE 155th Ave
SE 136th Ave
SE Talton Ave
SE Bella Vista Rd
SE Ellsworth Rd
SE Village Loop
SE 164th Ave
SE 15th St
SE 20th St
SE 192nd Ave
SE 29th St
SE 34th St
SE Evergreen Hwy
SE Cascade Park Dr
CITY OF Vancouver WASHINGTON
ARTERIAL STREET SYSTEM & CLASSIFICATION
EXISTING
PROPOSED
PRINCIPAL ARTERIAL
MINOR ARTERIAL
COLLECTOR
HEARING DATE
ADOPTION DATE
RESOLUTION NO
State Roadways
Corridor / Plan Area Overlay
City Limits
City Urban Growth Boundary
Print Date: May 2026 Map created by Public Works GIS
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Scale: 1 inch = 5,000 feet
Accurate when printed at 11"x17"
N
0 0.5 1 2 Miles
0 0.5 1 2 Kilometers

Glossary Section



Glossary

FREQUENTLY USED TERMS AND ACRONYMS

Access

Access is a means of approach to provide vehicular, bicycle, small mobility device or pedestrian entrance or exit to a property or public use such as transit or schools.

Access Management

Access management is the process of providing and managing access to land development while preserving the regional flow of traffic in terms of safety, capacity and speed.

ADA

Americans with Disabilities Act, a landmark civil rights law prohibiting discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and public/private places open to the public. It ensures equal opportunities and access, covering employment, state/local government services, and public accommodations.

ADT

Average Daily Traffic is the total volume of vehicle traffic passing a specific highway point or segment over a 24-hour period, averaged over a specific time frame shorter than a year. It measures how busy a road is, helping with short-term traffic planning, operations, and impact studies

A.M. Peak Hour

Identified by a one-hour period in the morning when traffic flow increases. The A.M. peak hour typically occurs between 6:30 a.m. and 9 a.m. Traffic volumes occurring during the A.M. peak hour are used to calculate the overall operation of a roadway or intersection.

ARPA

American Rescue Plan Act. The act was designed to boost the economic recovery, assist households, help schools reopen safely, and aid small businesses in responding to and recovering from the COVID-19 pandemic.

Arterial

An arterial is a major street carrying the traffic of local and collector streets to and from freeways and other major streets. Arterials generally have traffic signals at intersections and may have limits on driveway spacing and street intersection spacing. Further details can be found in the Vancouver Municipal Code (11.80.040).

BBC

Burnt Bridge Creek trail is fully paved, and mostly flat, multi-use trail in the City, linking Fruit Valley to NE 90th Avenue. This traverses diverse landscapes, including heavily

wooded areas, open grasslands, and tranquil wetlands near the creek, making it ideal for walking, running, and biking.

BNSF

Burlington Northern Santa Fe Railway

BRT

Bus Rapid Transit

Capacity

The maximum rate of flow at which vehicles can be reasonably expected to traverse a point or uniform segment of a lane or roadway during a specified time period under prevailing roadway, traffic, and control conditions; usually expressed as vehicles per hour. In the project list spreadsheets *Capacity* is a term used to describe a subset of projects that upgrade existing substandard streets to urban arterial standards. This subset of projects typically improves more than just vehicle capacity. They also improve the pavement section, street lighting, bicycle, pedestrian and ADA facilities.

CCRP

Corridor Congestion Relief Program is a state funding source that provides competitive federal grants to cities, municipalities, and Metropolitan Planning Organizations in urban areas with populations over 1 million, aiming to reduce highway congestion, enhance transit, and fund innovative, multimodal solutions.

CDBG

Community Development Block Grant is a federal funding source. Block grants are targeted for low and moderate-income areas. Improvements typically consist of sidewalk and capital improvement programs.

CIP

Capital Improvement Program is a 6-year, strategic document that includes schedules and funds for major utility projects. It bridges long-term planning with budgeting, ensuring financial capacity to build and maintain public utility assets.

CMAQ

Congestion Mitigation and Air Quality Improvement (Federal funding source). This funding is for projects that create a direct air quality benefit, leading toward attainment or maintenance of a National Ambient Air Quality Standard (NAAQS).

CN

Construction

Collector Streets – Urban Collector

Collectors – Urban Collector. *Urban collector* provides for land access and traffic circulation within and between residential neighborhoods, and commercial and industrial areas. Direct access to adjacent land uses, however, is still subordinate to traffic

movement. Access to abutting properties is controlled through the use of raised channelization, driveway spacing and pavement markings. Typically, collectors are not continuous for any great length, nor do they form a connected network by themselves.

Comprehensive Plan

Long-range plan, typically looking 20 to 50 years into the future, which is intended to guide growth and development of a community. Comprehensive Plans are required by the Washington State Growth Management Act for specific counties and cities in Washington State. The Plans establish goals and policies for managing population growth and land development while ensuring that the growth is adequately served by public facilities.

Concurrency

The Concurrency ordinance (VMC 11.95) was adopted in response to the Washington State Growth Management Act, which required local jurisdictions to adopt level-of-service (LOS) standards for the arterial road system and to ensure maintaining those standards when considering new development. This process is called *Concurrency*. Concurrency applies to any development, land division, site plan and conditional use permit approvals.

C-TRAN

Clark County Public Transportation Benefit Area Authority, the transit agency for Clark County, Washington.

DSF

Dedicated Street Funding (DSF) used to be called SFS (Street Funding Strategy). Refers to any revenue sources approved in 2015. Including Utility tax increase of 1.5%, Business License Surcharge increase, Transportation Benefit District (TBD) licensing fee revenues, and/or retired debt service being redirected to transportation improvements.

EA

Environmental Assessment a planning and decision-making tool used to evaluate the potential environmental, social, and economic impacts of a proposed project or development.

Environmental Review

The consideration of environmental factors as required by the Washington State Environmental Policy Act (SEPA). The environmental review process is the procedure used by agencies and others under SEPA for giving appropriate consideration to the environment in agency decision-making. (WAC 197-11-746).

Enhancement

Projects that upgrade pedestrian or bicycle facilities, or otherwise enhance the livability of the community through upgrades to the street system.

ESA

The Endangered Species Act was established in 1973 to preserve ecosystems of endangered and threatened species. The Act was recently amended to include various species of fish, wildlife, and plants throughout the United States.

GIS

Geographic Information System

Growth Management

A group of strategies used by a government to direct the timing, location and type of development in a community

Growth Management Act (GMA)

The State of Washington's Growth Management Act was adopted in 1990 to address the negative consequences of unprecedented population growth and suburban sprawl in the State. The GMA requires all cities and counties in the State to plan for future growth, with more extensive requirements for the largest and fastest-growing counties and cities in the State. Its requirements include guaranteeing the consistency of transportation and capital facilities plans with land use plans.

HAWK beacon

High intensity activated sidewalk (HAWK) beacon is a traffic control device used to stop traffic and allow pedestrians to cross safely.

HES

Hazard Elimination System/Safety (Federal Funding Source). The objective of this fund is to improve specific locations which constituted a danger to vehicles or pedestrians as shown by frequency of accidents.

HISP-HRRP

In 2008, a portion of the funding provided through Federal Transportation Act SAFETEA-LU was made available for safety grants. Funds were provided through the Highway Safety Improvement Program (HSIP) and the High Risk Rural Roads Program (HRRRP).

HOV

High-Occupancy Vehicle is a car, van, or bus carrying a minimum number of occupants (typically two or more) allowed to use designated carpool lanes on highways.

Impacts

Impacts are the effects or consequences of actions. Environmental impacts are effects upon the elements of the environment.

Interchange

A system of interconnecting roadways in conjunction with one or more grade separations, providing for the movement of traffic between two or more roadways on different levels

Intersection

The general area where two or more roadways join or cross, within which are included the roadway and roadside facilities for traffic movements in that area.

ITS

Intelligent Transportation System are advanced technologies applied to transportation infrastructure and vehicles to improve safety, mobility, and efficiency. They enable real-time traffic management, vehicle-to-infrastructure communication, and smoother, safer travel by reducing congestion and accidents.

Land Use

This type of activity associated with a specific geographic area. Land-use categories can be broad (e.g., residential, retail, office, industrial, and recreational), or they can be very specific (e.g., single-family residential, convenience market, or elementary school). In order to estimate trip generation characteristics for a specific geographic area, it is necessary to know both the type and intensity of land use (e.g., single-family residential land use at a development intensity of eight units per acre).

Level of Service (LOS)

The Level of Service is a grading system developed by the transportation profession to quantify the degree of comfort (including such elements as speed, travel time, number of stops, total amount of stopped delay, and impediments caused by other vehicles) afforded to drivers as they travel through an intersection or roadway segment. LOS is expressed as a letter grade that ranges from “A”, indicating that drivers will experience little, if any delay, to “F”, indicating significant traffic congestion and driver delay will occur.

Mitigation

(1) Avoiding impacts altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts; (3) rectifying impacts by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating impacts over time by preservation and maintenance operations during the life of the action; (5) compensating for impacts by replacing, enhancing or providing substitute resources or environments; and/or, (6) monitoring impacts and taking appropriate corrective measures (WAC 197-11-768).

Mode

The means by which travel is accomplished. Alternative modes of travel include walking, bicycling, auto, bus, light rail, airplane, ferry, etc.

Multi Modal Level of Service (MMLOS)

Transportation planning framework that measures the quality, speed, and convenience of travel for all users (pedestrians, cyclists, transit riders, and drivers) rather than focusing solely on vehicle traffic.

MVFT

Motor Vehicle Fuel Tax is an excise tax levied by federal, state, and local governments on the sale of gasoline, diesel, and other motor fuels.

NAAQS

The National Ambient Air Quality Standards were set up by the Environmental Protection Agency (EPA) to help mitigate the health impacts of air pollution. EPA established NAAQS measure for six pollutants that include carbon monoxide, ozone, particulate matter, lead, sulfur dioxide, and nitrous oxide.

Non-attainment Area

Geographic area in which air pollution levels exceed the NAAQS.

PCI

Pavement Condition Index (PCI) provides a snapshot of the pavement health of a road. It is measured on a scale of 0 to 100 (where 100 means a newly paved road).

Peak Hour

A period of 60 consecutive minutes during which an intersection or roadway system experiences the greatest amount of traffic volume

PE

Preliminary Engineering is the crucial pre-construction phase that defines a project's scope, feasibility, and estimated costs. It bridges conceptual ideas and final design by conducting site investigations, environmental studies, and initial design sketches. This phase minimizes risks by establishing project alignment, budget, and schedule before full funding is authorized.

P.M. Peak Hour

A one-hour period in the afternoon or evening when traffic flow increases. The P.M. peak hour typically occurs between 4 and 6 p.m. Traffic volumes occurring during the P.M. peak hour are used to calculate the overall operation of a roadway or intersection.

PSE

Plans, Specifications and Estimates

PWB

Public Works Board. The Public Works Board was created by the 1985 State Legislature. The Board is composed of local government officials, special purpose district representatives and private sector members. The mission of the Washington State Public Works Board is "to assist Washington's local governments and private water systems in meeting their public works needs to sustain livable communities." The Board is authorized to loan money to counties, cities, and special purpose districts to repair, replace, or create domestic water systems, sanitary sewer systems, storm water systems, roads, streets, solid waste and recycling facilities and bridges.

PWTF

Public Works Trust Fund. This trust fund is administered by the Public Works Board. The PWTF Construction and Pre-construction Loan Programs provide funds to design, repair, replace or create a facility. These loans have a 5- to 20-year term with an interest rate of one-half percent. Maximum for any agency is $10 million per biennium.

RCW

Revised Code of Washington. Contains all laws of the state of general and permanent nature.

REET

Real-estate Excise Tax is a transaction-based tax imposed on the sale or transfer of real property, such as homes, land, or commercial buildings.

RRFB

Rectangular Rapid Flashing Beacons are pedestrian-activated, high-intensity LED lights paired with pedestrian warning signs at uncontrolled, marked crosswalks. They flash in a rapid, alternating "stutter" pattern to increase driver awareness.

RTC

Southwest Washington Regional Transportation Council. RTC is the regional transportation planning agency for Clark, Klickitat and Skamania counties.

Right-of-Way/ROW

Right-of-way is property held by the City for existing or future public roads or other public improvements.

Roadway

A roadway is the improved portion of an easement or right-of-way, excluding curbs, sidewalks and ditches. Road, roadway and street are used as interchangeable terms.

Roadway Conditions

The geometric characteristics of the street or highway, including the type of facility and its development environment, the number of lanes (by direction), lane and shoulder widths, lateral clearances, design speed, and horizontal and vertical alignments.

Roadway Section

A roadway section is a cross-section of a roadway which displays, travel lanes, turning lanes, bike lanes, sidewalks and medians with their respective dimensions. Each classification of roadway has a corresponding roadway section.

SEPA

State Environmental Policy Act. SEPA is a state law requiring agencies to consider the environmental consequences of their decisions. (WAC 197-11-790).

SFS

Street Funding Strategy (SFS) now being referred to as DSF (Dedicated Street Funding). Refers to any revenue sources approved in 2015. Including Utility tax increase of 1.5%, Business License Surcharge increase, Transportation Benefit District (TBD) licensing fee revenues, and/or retired debt service being redirected to transportation improvements.

Signal Warrant

A criterion that must be met before the installation of a traffic signal can be considered.

Significant/Significance

- Significant as used in SEPA means a reasonable likelihood of more than a moderate adverse impact on environment quality.
- Significance involves context and intensity and does not lend itself to a formula or quantifiable test. Context may vary with the physical setting. Intensity depends on magnitude and duration of an impact. Severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be *significant* if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred. (WAC 197-11-794).

SS4A

Safe Streets and Roads for All

SRTS

Safe Routes to School

SWCAA

Southwest Washington Clean Air Agency. A government agency responsible for air pollution control and planning in Clark, Cowlitz, Lewis, Skamania and Wahkiakum Counties.

TBD

Transportation Benefit District (TBD). In the state of Washington, a Transportation Benefit District is a quasi-municipal corporation and independent taxing district that can raise revenue for specific transportation projects, usually through vehicle license fees or sales taxes. RCW 36.73 authorizes cities (see also RCW 35.21.225) and counties to form TBDs. In other uses, TBD is a common term meaning “to be determined.”

TDM

Transportation Demand Management. A demand-based technique for reducing traffic congestion, such as ride-sharing programs and flexible work schedules enabling employees to commute to and from work outside of peak hours.

TIB

Transportation Improvement Board. A state funding agency that administers several state funding programs. The mission of the TIB is to assist local agencies to preserve and improve transportation systems by providing financial assistance, supporting economic development, promoting multi-jurisdictional and multi-modal coordination and to promote public/private cooperation.

TIF

Transportation Impact Fee. TIF is the traffic impact component of a development impact fee. An impact fee is a fee levied on a developer by the county as compensation for expected effects of the development.

TIP

Transportation Improvement Program is a 6-year, strategic document that includes schedules and funds for major transportation projects. It bridges long-term planning with budgeting, ensuring financial capacity to build and maintain public transportation assets.

TMC

Transportation and Mobility Commission advises the City Council and staff on transportation policies, infrastructure, and planning to ensure safe, sustainable, and equitable mobility. It focuses on improving multimodal options, such as walking, biking, and transit, as well as reviewing the 6-year Transportation Improvement Program (TIP).

TS

Traffic Signal Project

TSO

Traffic Signal Optimization is the process of adjusting traffic light timing to improve traffic flow, minimize delays, and reduce stops for vehicles, pedestrians, and cyclists. It maximizes existing infrastructure capacity, reducing congestion and emissions.

TSP

Transportation System Plan guides investments in our transportation system for the next 20 years. Vancouver's transportation system includes our network of streets, sidewalks, bicycle routes, bus routes, trails, and ADA-accessible facilities.

USDOT

United States Department of Transportation

V/C Ratio

Ratio of volume to capacity for a traffic facility.

Volume

Number of vehicles passing a point on a lane or roadway during some time interval, often taken to be one hour, but may also be expressed in terms such as sub-hourly, daily or annually.

WAC

Washington Administrative Code. The WAC is laws adopted by state agencies to implement state legislation.

WSDOT

Washington State Department of Transportation. WSDOT is a department of the State of Washington responsible for transportation-related planning, management and coordination.

WWRP

Washington Wildlife and Recreation Program is the state's largest public funding source for outdoor recreation and habitat conservation, providing matching grants for parks, trails, and wildlife habitat protection. Administered by the Washington State Recreation and Conservation Office, it supports local and state projects, including land acquisition, restoration, and facility development.

Zoning

A map and ordinance text which divides a city or county into land use "zones" and specifies the types of land uses, setbacks, lot size, and size restrictions for buildings within each zone.

Supplementary Document Section

This section is intended for those using screen readers and complements the 6-Year Project Lists Section and Project Details Section of the Transportation Improvement Plan.



Project ID	Workday ID	Project Name	Project Extent - Start	Project Extent - End	Project Type	Project Status	Funding Status	Project Description	Project Justification	Priority Score	Grant Fund?	Grant Amount	Estimated Total Cost	Traffic Impact Fees Area	Estimated Start of Construction
TRANS-0237	PRJ072330	Traffic Signal Sustainability2	Citywide		Program	Active	Funded	Ongoing program to update traffic signals at locations throughout the City. Updates may include but are not limited to adding left-turn phasing, signal heads, pedestrian push-button and detectors, as well as removing a type of operation, changing detector setup or making other improvements. Dedicated Street Funding contribute $200,000 per year, with annual program budget totaling $415,000 per year.	Traffic signals need to be upgraded or replaced as they reach the end of their useful lives. This program reflects the implementation of that philosophy.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0240	PRG0102	Neighborhood Traffic Management Program	Citywide		Program	Active	Funded	Projects implemented as part of the ongoing Neighborhood Traffic Management (Calming) Program are intended to help slow traffic and enhance neighborhood livability. These projects may include education or infrastructure to reduce driver speeds; new or improved facilities for people walking, biking, and using mobility devices; and other strategies to increase safety and mobility in Vancouver neighborhoods. Dedicated Street Funding contribute $130,000 per year, with annual program budget totalling $300,000 per year.	The Neighborhood Traffic Management (Calming) Program is important to reaching our Community Vision of "...Safe neighborhoods with a distinct quality and proud identities linked by parks and greenspace as well as a transportation system that provides mobility option".	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0241	Varies	Pavement Management Program	Citywide		Program	Active	Funded	This ongoing program improves and maintains pavement surfaces through surface overlay, micro surfacing and slurry treatments citywide. Upgrades may include new ADA ramps, traffic striping and markings. Annual budget of approximately $12M in existing money plus approximately $600,000 in Dedicated Street Funding dollars for a total annual budget of approximately $12.6M.	To improve and maintain pavement surfaces citywide. Program identified in the Vancouver Comprehensive Plan (2011-2030).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0245	PRG0256	Bridge Inspection Program	Citywide		Program	Active	Funded	Ongoing citywide inspection and maintenance of our bridges, as required to meet state and federal regulations. This program, formerly contracted with Clark County, is being dropped by the county and now requires hiring professional services to complete federally mandated bridge inspections and load ratings. Program budgeted at $50,000 per year.	Maintain safe bridges in compliance with state and federal regulations. Program identified in the Vancouver Comprehensive Plan (2011-2030).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0274	TBD	Northeast 28th Street - Northeast 142nd Avenue to Northeast 162nd Avenue	Northeast 142nd Avenue	Northeast 162nd Avenue	Arterial Improvements	Future	Partially Funded	Upgrade of existing 2-lane former rural road to urban 3-lane minor arterial (1 lane each direction plus center turn lane) with sidewalks, mobility lanes, streetlights, signals, school crossings, stormwater and sound walls where required. Project addresess capacity and improves pavement and safety conditions.	Upgrade of substandard urban arterial with level of service, poor pavement and safety deficiencies. Project identified in Vancouver Comprehensive Plan (2011-2030). Based on 2012 safety report this project has potentially high safety benefits.	Near-term	Yes	$ 5,750,000	$ 14,494,000	Pacific	Unknown
TRANS-0279	TBD	Northeast 49th Street - Northeast 122nd Avenue to Northeast 137th Avenue	Northeast 122nd Avenue	Northeast 137th Avenue	Arterial Improvements	Future	Partially Funded	Upgrade of existing 2-lane street to 3-lane urban minor arterial (1 lane each direction and turn lane) with sidewalks, ADA Ramps, mobility lanes, and streetlights. Project helps improve capacity and safety.	Upgrade of substandard urban arterial with level of service and safety deficiencies. Project identified in Vancouver Comprehensive Plan (2011-2030).	Near-term	Yes	$ 562,500	$ 11,000,000	Pacific	Unknown
TRANS-0281	TBD	Northeast 18th Street - Northeast 87th Avenue to Northeast 97th Avenue	Northeast 87th Avenue	Northeast 97th Avenue	Arterial Improvements	Future	Unfunded	Long-planned construction of new minor arterial street (1 lane each direction plus turn lane) with mobility lanes, streetlights, sound walls (where required), a sidewalk on north side and shared use pathway on south side of street. Project provides planned east-west circulation. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue (Outside 6-year horizon)	New roadway segment which provides planned east/west circulation. Project identified in Vancouver Comprehensive Plan (2011-2030). Environmental Assessment and alignment study completed and approved in 2004.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 16,000,000	Columbia & Cascade	Unknown
TRANS-0349	TBD	Northeast 18th Street - Northeast 164th Avenue to Northeast 192nd Avenue	Northeast 164th Avenue	Northeast 192nd Avenue	Arterial Improvements	Future	Unfunded	Long-planned upgrade of 2-lane principal arterial, originally at rural standards, to increase safety and improve service levels. Improvements include additional travel lanes, mobility lanes, streetlights, sound walls, sidewalk on north side and shared use pathway on south side of street. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue. (Outside 6-year horizon)	Substandard urban arterial with level of service and safety deficiencies. Project identified in the Vancouver Comprehensive Plan (2011-2030). Environmental Assessment alignment study completed and approved in 2004.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 20,000,000	Columbia & Cascade	Unknown
TRANS-0444	PRJ100788	Northeast 18th Street - Northeast 141st Avenue to Northeast 162nd Avenue	Northeast 141st Avenue	Northeast 162nd Avenue	Arterial Improvements	Future	Partially Funded	Long-planned urban upgrade of 2-lane road to principal arterial standards. Originally built at rural standards to improve service and safety. Improvements include 5-lane principal arterial (2 lanes each direction plus turn lane) with separated and protected mobility lanes, streetlights, sound walls (where required), sidewalk and ADA ramps, and shared use pathway on south side of street. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue.	Substandard urban arterial with level of service and safety deficiencies. Environmental Assessment alignment study completed and approved in 2004. Project identified in the Vancouver Comprehensive Plan (2011-2030).	Medium-term	Yes	$ 7,500,000	$ 18,350,000	Pacific & Cascade	2027
TRANS-0527	PRJ071616	Northeast 18th Street - Northeast 97th Avenue to Northeast 107th Avenue	Northeast 97th Avenue	Northeast 107th Avenue	Arterial Improvements	Active	Funded	Long-planned new urban arterial and upgrade of existing segments to current arterial standards. The improvement will be a multimodal facility including travel lanes, evaluation of roundabouts at intersections, mobility lanes, streetlights, ADA accessible pedestrian ramps, sound walls (where required), sidewalk, and a multi-use pathway. The east end of the project will connect to the recently constructed WSDOT/Interstate-205 on ramp and roundabout. Design/ROW phases are continuing. This is one of 5 phases to improve 18th Street from 87th Avenue to 192nd Avenue. Identified by regional arterial improvement plan.	Identified by regional arterial improvement plan.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 10,000,000	$ 25,000,000	Pacific & Cascade	2026
TRANS-0603	PRJ101230	MacArthur and Leiser Improvements			Arterial Improvements	Future	Partially Funded	Intersection project to modify an existing 4-way-stop intersection that is operating at near maximum capacity. Improvements include new traffic signal or roundabout, upgraded sidewalks, ADA ramps and streetlights to improve traffic system, safety, mobility, and accessibility.	Identifed through community feedback, roadway operational analysis, and also identified through the Heights District Plan (2020).	Near-term	No		$ 4,729,400	Cascade	Unknown
TRANS-0607	PRJ100868	Northeast 192nd Avenue - Northeast 18th Street to Southeast 1st Street	Northeast 18th Street	Southeast 1st Street	Arterial Improvements	Future	Partially Funded	Urban upgrade of existing 2-lane street. Improvements include additional travel lanes, sidewalks, mobility lanes, ADA ramps and streetlights to improve system, safety, mobility, and accessibility. Received a federal grant to begin the design phase and RTC grant for ROW.	This project originated from Section 30 Subarea Plan (2009).	Near-term	Yes	$ 7,250,000	$ 21,242,000	Cascade	Unknown
TRANS-0680	TBD	Columbia Shores Boulevard at Columbia Way - BNSF Undercrossing Widening			Arterial Improvements	Future	Unfunded	Project to widen existing railroad undercrossing portal and improve Columbia Shores/Columbia Way intersection to address service levels and increase pedestrian and mobility access. Total scope of project is undefined. (Outside 6-year horizon)	Level of service deficiency and sub-standard pedestrian and bicycle access conditions. Identified by staff and through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 30,000,000	Columbia	Unknown
TRANS-0712	TBD	Northeast 59th Street - Northeast 147th Avenue to Northeast 162nd Avenue	Northeast 147th Avenue	Northeast 162nd Avenue	Arterial Improvements	Future	Unfunded	New minor arterial street (1 lane each direction plus turn lane) with sidewalks, ADA ramps, mobility lanes, streetlights and surface water treatment. Project will address circulation needs, improve safety, mobility, accessiblity and stormwater management. (Outside 6-year horizon)	New roadway segment needed to address circulation needs within sub district. Project identifed as part of the Bircher area redevelopment.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 9,000,000	Pacific	Unknown
TRANS-0716	TBD	Northeast 9th Street - Northeast 172nd Avenue to Northeast 192nd Avenue	Northeast 172nd Avenue	Northeast 192nd Avenue	Arterial Improvements	Future	Unfunded	New urban collector street (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes, and streetlights.	This priority east-west circulation route is part of Section 30 Subarea Plan (2009) and also where this project originated.	Medium-term	No		$ 12,000,000	Cascade	Unknown
TRANS-0717	TBD	Northeast 184th Avenue - Northeast 4th Street to Northeast 18th Street	Northeast 4th Street	Northeast 18th Street	Arterial Improvements	Future	Unfunded	New urban collector street (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights. Developer will construct the section from Southeast 1st Street to 4th Street. (Outside 6-year horizon)	This priority north to south circulation route is part of Section 30 Subarea Plan (2009) and also where this project originated.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 14,000,000	Cascade	Unknown
TRANS-0718	TBD	Northeast 162nd Avenue - Southeast 1st Street to Northeast 9th Street	Southeast 1st Street	Northeast 9th Street	Arterial Improvements	Future	Unfunded	Upgrade of 5-lane road to 7-lane principal arterial street (3 lanes each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights. Roadway cross section will match Northeast 162nd Avenue to the north and south. (Outside 6-year horizon)	Improvement listed in Vancouver Comprehensive Plan (2011-2030).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 13,000,000	Cascade	Unknown
TRANS-0719	TBD	Northeast 112th Avenue - East Mill Plain Boulevard to Northeast 28th Street Safety and Mobility Complete Street	East Mill Plain Boulevard	Northeast 28th Street	Arterial Improvements	Future	Unfunded	Corridor improvements to bring Northeast 112th Avenue up to urban arterial standards, and address safety and accessibility issues for all modes of travel.	Originated from 112th Corridor Subarea Plan (2011) and the Northeast 112th Safety and Mobility Project (2024).	Near-term	No		$ 3,000,000	Columbia & Cascade	Unknown
TRANS-0722	TBD	Northeast Saint Johns Boulevard and Northeast 68th Street			Signal & Transportation Improvements	Future	Unfunded	Modify existing intersection to improve traffic safety and level of service. (Outside 6-year horizon)	Level of service deficiency. Identified through the development review process and included in the Saint Johns/Saint James Safety and Mobility Project for active transportation improvements.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Columbia	Unknown
TRANS-0723	TBD	Southeast 20th Street and Southeast 176th Avenue			Arterial Improvements	Future	Unfunded	Modify existing intersection to improve traffic safety, operations and level of service.	Level of service deficiency. Identified through the development review process.	Near-term	No		$ 1,000,000	Cascade	Unknown
TRANS-0740	PRJ071455	Evergreen Trail - Chelsea to Image	Southeast Chelsea Avenue	Southeast Image Road	Active Transportation	Active	Funded	Upgrade roadway with 6 to 10 foot pedestrian pathway on south side, a priority east-west pedestrian and mobility lane corridor.	Substandard roadway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 2,500,000	$ 4,000,000	Cascade	2026

Project ID	Workday ID	Project Name	Project Extent - Start	Project Extent - End	Project Type	Project Status	Funding Status	Project Description	Project Justification	Priority Score	Grant Fund?	Grant Amount	Estimated Total Cost	Traffic Impact Fees Area	Estimated Start of Construction
TRANS-0741	TBD	Evergreen Highway Pathway - Columbia Springs to Southeast 164th Avenue	Southeast Silver Springs Drive	Southeast 164th Avenue	Active Transportation	Active	Unfunded	Upgrade roadway with 6 to 10 foot pedestrian pathway, a priority east-west pedestrian and mobility lane corridor. (Outside 6-year horizon)	Substandard Roadway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 7,000,000	Cascade	Unknown
TRANS-0742	TBD	Evergreen Highway Pathway - Southeast 164th Avenue to East City Limits	Southeast 164th Avenue	East City Limits	Active Transportation	Future	Unfunded	Upgrade roadway with 6 to 10 foot pedestrian pathway on south side, a priority east-west pedestrian and mobility lane corridor. (Outside 6-year horizon)	Substandard Rdway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 7,000,000	Cascade	Unknown
TRANS-0746	PRJ071251	Southeast McGillivray Boulevard and Southeast 166th Avenue			Signal & Transportation Improvements	Future	Unfunded	Improve intersection with urban roundabout, including upgrades to ADA ramps and streetlights. (Outside 6-year horizon)	Level of service deficiency. Identified through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 500,000	Cascade	Unknown
TRANS-0818	TBD	Northeast Burton/28th Street - Northeast Andresen Road to Northeast 138th Avenue	Northeast Andresen Road	Northeast 138th Avenue	Signal & Transportation Improvements	Future	Unfunded	Installation of fiber and connections between fiber optic cables to traffic signal controllers to improve signal operations along the corridor. (Outside 6-year horizon)	Identified by regional arterial improvement plan.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Pacific	Unknown
TRANS-0819	TBD	Northwest Fruit Valley Road at La Frambois Road			Signal & Transportation Improvements	Future	Unfunded	Upgrade existing signal to current standards. (Outside 6-year horizon)	Identifed by staff and through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Columbia	Unknown
TRANS-0825	TBD	Northeast 54th Street - Northeast 15th Avenue to Northeast Saint James Road	Northeast 15th Avenue	Northeast Saint James Road	Arterial Improvements	Future	Unfunded	Upgrade of existing 2-lane road to an urban arterial (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights to improve safety, mobility, accessibility, and level of service. New signal to be added at Northeast 54th Street and Saint Johns Boulevard.(Outside 6-year horizon)	Upgrade of substandard urban arterial with level of service and safety deficiencies. Identified through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 14,000,000	Columbia	Unknown
TRANS-0826	TBD	Northeast 104th Avenue - Southeast Mill Plain Boulevard to Northeast 14th Street	Southeast Mill Plain Boulevard	Northeast 14th Street	Arterial Improvements	Future	Unfunded	Upgrade of existing 2-lane road to an urban arterial (1 lane each direction plus turn lane), including sidewalks, ADA ramps, mobility lanes and streetlights. (Outside 6-year horizon)	Upgrade of substandard urban arterial with level of service and safety deficiencies. Identified through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 12,000,000	Cascade	Unknown
TRANS-0827	TBD	Northeast 104th Avenue - Northeast 14th Street to Northeast 18th Street	Northeast 14th Street	Northeast 18th Street	Arterial Improvements	Future	Unfunded	New arterial street (1 lane each direction plus turn lane), with sidewalks, ADA ramps, mobility lanes and streetlights, to increase safety, mobility, accessiblity and level of service. (Outside 6-year horizon)	New urban arterial will address level of service and accessibility issues. Identified through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 12,000,000	Cascade	Unknown
TRANS-0836	TBD	East Evergreen Boulevard Bridge over South Blandford Drive			Arterial Improvements	Future	Unfunded	Replace existing bridge along Evergreen Blvd. at Blandford with new structure. Project will address safety and accessibility for all modes of travel. (Outside 6-year horizon)	Existing bridge is nearing the end of its useful life and bridge inspection reports indicate that the bridge should be planned for replacement in the near future. Identified through our Bridge Inspection Program.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 15,000,000	Columbia	Unknown
TRANS-0839	PRJ100351	Fourth Plain and 152nd Avenue Signal			Signal & Transportation Improvements	Future	Partially Funded	Install new signal to accommodate future growth.	Intersection is ancipated to have a below standard LOS in the near future due to growth. Originated with Bircher area redevelopment.	Near-term	No		$ 1,200,000	Pacific	Unknown
TRANS-0843	PRJ071448	Southeast Evergreen Highway Pathway - Southeast Image Road to Southeast 100th Court	Southeast Image Road	Southeast 100th Court	Active Transportation	Active	Unfunded	Upgrade street with 6 to 10 foot pedestrian pathway on south side of roadway, a priority east/west pedestrian and mobility lane corridor. Design and ROW funded. No funding for construction.	Substandard roadway and shoulder conditions, priority east/west pedestrian and bicycle corridor. Originated from Clark County Parks and Recreation Scenic Evergreen Trail Plan (1994), Evergreen Highway Trail Project Scoping Report (2009), and Evergreen Corridor Management Strategy (2016).	Near-term	No		$ 1,000,000	Cascade	Unknown
TRANS-0844	PRJ072459	Multi Modal Safety and Accessibility Program	Citywide		Program	Active	Funded	Ongoing program budgeted at $1.5 million per year, to address safety and accessibility for people walking, biking, and rolling.	Program will be used to address safety and accessibility deficiencies throughout the City including, but not limited to, pedestrian, bicycles, and Americans with Disability Act.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0848	TBD	Southeast 164th Avenue and Southeast 12th Street Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	Increase left-turn movement capacity at intersection of Southeast 164th Avenue and Southeast 12th Street to improve overall Level of Service. (Outside 6-year horizon)	Left turn demand exceeds left turn capacity on certain legs of the intersection. Identified by staff.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Cascade	Unknown
TRANS-0856	TBD	Northeast 18th Street and Northeast 172nd Avenue Intersection Improvements			Arterial Improvements	Future	Unfunded	Install additional turn lanes and other signal improvements at the intersection of Northeast 18th Street and Northeast 172nd Avenue. (Outside 6-year horizon)	Currently the intersection of Northeast 18th Street and Northeast 172nd Avenue is signalized, but the intersection needs additional turn lanes and signal improvements. Identified through the development review process.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 500,000	Cascade	Unknown
TRANS-0857	TBD	Southeast 10th Street Sidewalks - Southeast 98th Avenue to Southeast Ellsworth Road	Southeast 98th Avenue	Southeast Ellsworth Road	Active Transportation	Future	Unfunded	Install sidewalks and ADA ramps along Southeast 10th Street from Southeast 98th Avenue to Ellsworth Road, including on the north side between Ellsworth Road and Interstate-205. (Outside 6-year horizon)	Sidewalks along 10th Street would improve pedestrian safety, currently there are no sidewalks. Identified by staff and public. Remaining connection on the City's major east/west active transportation network corridor with McLoughlin, MacArthur, McGillivray and Southeast 34th Street.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Cascade	Unknown
TRANS-0859	PRG0138	Sidewalk Management Program	Citywide		Program	Active	Funded	Program manages all sidewalks and ADA curb ramps within the City limits. Includes notification and assistance to land owners to correct sidewalk and ADA curb ramp deficiencies along their property frontage. Program is budgeted for $500,000 per year.	To improve how we provide safe sidewalks and manage our sidewalk inventory.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0861	TBD	Westside Bike Mobility			Active Transportation	Future	Unfunded	First phase of implementation was focused on the Columbia corridor, completed in 2022. Project recommendations from the planning study included traffic calming, mobility lanes and pedestrian improvements throughout the westside of downtown Vancouver. Implementation of other routes will occur as funding allows. (Outside 6-year horizon)	The Westside Bike Mobility study recommended multiple bicycle enhancements in the downtown area.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 5,000,000	Columbia	Unknown
TRANS-0868	TBD	Saint Johns Boulevard and Fort Vancouver Way Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	Install enhanced stop control at Saint Johns Boulevard and Fort Vancouver Way as well as associated civil roadway improvements. (Outside 6-year horizon)	Intersection needs modifications in order to accommodate current and future traffic volumes and improve safety for all modes. Identified through the development review process with concept designs recommended and developed in the Saint Johns/Saint James Safety and Mobility Project.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Columbia	Unknown
TRANS-0869	PRJ100786	Citywide Street Light Program	Citywide		Program	Future	Funded	Program to install new street lights, including all fixtures and power, and replace old street lights citywide. This program is different than TRANS-853 which is intended to upgrade bulbs only.	Needed program to install new street lights and replace old street lights citywide.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-0873	TBD	Upper Main Street Complete Street and Paving Project - Fourth Plain Boulevard to East 37th Street	Fourth Plain Boulevard	East 37th Street	Active Transportation	Future	Unfunded	The Upper Main Street Complete Street Project between Fourth Plain Boulevard to 37th Street will restripe to improve traffic flow. Strategic improvements are incorporated throughout the length of the project and they include: new marked crossings with median islands at 31st and 35th Streets, removal of a northbound travel lane, wayfinding signage and speed limit reduction from 30 to 25 mile per hour. Improvements to be coordinated with C-TRAN Highway 99 BRT project.	Improving safety, mobility, and providing additional modal choices for road users. Identifed by staff and recommended by the Transportation and Mobility Commission.	Near-term	No		$ 1,000,000	Columbia	Unknown
TRANS-0879	PRJ100352	Columbia House Boulevard and Grove Street Signal Upgrade			Signal & Transportation Improvements	Future	Partially Funded	This project will add a dedicated northbound right-turn lane on the westbound off-ramp; and add a second westbound through lane. Reconstruct ADA ramps and move signal poles as necessary. Striping and signalization changes as necessary. Funded by proportionate share program.	Improvements are necessary to mitigate future localized development impact identified by developer's traffic study. Identified through the development review process.	Near-term	No		$ 658,000	Columbia	Unknown
TRANS-0880	TBD	McGillivray Boulevard and Village Loop Drive Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	New stop controlled device at intersection. Conduct signal warrant and analysis to determine stop control device (roundabout or signal).	The all-way stop controlled intersection is experiencing long vehicle delays during the peak hours and needs safety improvements for active transportation users. Identified through the development review process and recommended as part of the McGillivray Boulevard Safety and Mobility Project (2024).	Near-term	No		$ 500,000	Cascade	Unknown
TRANS-0883	TBD	Northwest 32nd Avenue and Lower River Road Roundabout			Arterial Improvements	Future	Unfunded	Phase 2 of the Northwest 32nd Avenue Freight Access project proposes a roundabout at the intersection of State Route-501 and Northwest 32nd Avenue to improve traffic operations. (Outside 6-year horizon)	Substandard roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Columbia	Unknown
TRANS-0884	PRJ100717	Northwest 32nd Avenue Freight and Mobility - Lower River Road to Northwest 61st Street	State Route-501	NW 61st Street	Arterial Improvements	Future	Unfunded	Phase 5 of the Northwest 32nd Avenue Freight Access project proposes a new segment that will consist of three travel lanes, mobility lanes, planter strips and ADA accessible sidewalks. The sidewalk along the west side of the roadway is 10 feet wide to accommodate a multi-use path facility. (Outside 6-year horizon)	Substandard Roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 64,000,000	Columbia	Unknown
TRANS-0885	TBD	Northwest 32nd Avenue Freight and Mobility - Northwest 61st Street to Burnt Bridge Creek	Northwest 61st Street	Burnt Bridge Creek	Arterial Improvements	Future	Unfunded	Phase 4 of the Northwest 32nd Avenue Freight Access project proposes rebuilding Lakeshore Avenue/Fruit Valley Road and the existing bridge over the BNSF right-of-way. The cross section will consist of three travel lanes, mobility lanes, planter strips and ADA accessible sidewalks. The sidewalk along the west side of the roadway is 10 feet wide to accommodate a multi-use path facility. (Outside 6-year horizon)	Substandard roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 49,000,000	Columbia	Unknown

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TRANS-0886	TBD	Northwest 32nd Avenue Freight and Mobility - Burnt Bridge Creek to Northwest 78th Street	Burnt Bridge Creek	Northwest 78th Street	Arterial Improvements	Future	Unfunded	Phase 3 of the Northwest 32nd Avenue Freight Access project proposes rebuilding Lakeshore Avenue/Fruit Valley Road to a cross section consisting of three travel lanes, mobility lanes, planter strips and ADA accessible sidewalks. The sidewalk along the west side of the roadway is 10 feet wide to accommodate a multi-use path facility. (Outside 6-year horizon)	Substandard Roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 10,000,000	Columbia	Unknown
TRANS-0887	PRJ100787	Fruit Valley and Lakeshore Avenue Roundabout			Arterial Improvements	Future	Partially Funded	Phase 1 of the Northwest 32nd Avenue Freight Access project proposes a new roundabout to improve traffic operations at the intersection of Northwest Lakeshore Avenue, Northwest 78th Street, and Fruit Valley Road.	Substandard Roadway conditions and reported safety concerns. Originated from Westside Mobility Strategy (2016).	Long-term	No		$ 5,236,000	Columbia	Unknown
TRANS-0888	PRJ100443	192nd Avenue On-Ramp to State Route-14 Signal			Signal & Transportation Improvements	Future	Partially Funded	Install a new traffic signal, on the westbound on-ramp from Southeast 192nd Avenue to State Route-14. Partially funded by Proportionate Share money.	This signal is needed to improve safety and Level of Service. Improvements triggered by proposed development in the area including the Columbia Palisades development.	Near-term	No		$ 2,016,000	Cascade	2026
TRANS-0889	PRJ100592	Northeast 18th and Devine Pedestrian Improvements (SS4A)			Active Transportation	Active	Funded	Project improvements for improved ADA access at the intersection of Northest 18th Street and Devine Road. Funded through TRANS-844 - Multimodal Safety and Accessibility.	Originated from Fourth Plain Corridor Subarea Plan (2007) and included in the City's USDOT Safe Streets and Roads for All grant package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 550,000	Columbia	2026
TRANS-0890	TBD	Northeast Fourth Plain Boulevard and Grand Boulevard - Pedestrian Improvement Southwest Corner			Active Transportation	Future	Unfunded	Increase radius of southwest corner to improve pedestrian safety and ADA access, and accommodate truck turns. Project requested by City of Vancouver Traffic Engineering. (Outside 6-year horizon)	To improve pedestrian safety at this corner, for pedestrian movement and sight distance for safe crossing both eastward and northward. Originated from Fourth Plain Corridor Subarea Plan (2007) and Fourth Plain Forward Action Plan (2015).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 700,000	Columbia	Unknown
TRANS-0891	TBD	East Mill Plain Boulevard - Boise Avenue to North Andresen Road	Boise Avenue	North Andresen Road	Arterial Improvements	Future	Unfunded	Heights District Plan recommended roadway changes to improve safety, support multimodal mobility and accommodate future Bus Rapid Transit line. Includes reducing lane widths, adding protected mobility lanes, improving sidewalks, adding planter strips, and adding and/or improving ADA access and pedestrian crossings at Ogden, Missoula and Helena.	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Near-term	No		$ 10,000,000	Columbia	Unknown
TRANS-0892	TBD	MacArthur Boulevard - Blandford Drive to Lieser Road	Blandford Drive	Lieser Road	Arterial Improvements	Future	Unfunded	Heights District Plan recommended roadway changes to improve safety, support multi-modal mobility, and add a linear greenbelt. Includes moving vehicle travel to the east side of the median and converting the west side to separated mobility lanes and pedestrian facilities, and open space. Will include improved ADA access and pedestrian crossings at Blanford, Phoenix, Texas and Burdick. (Outside 6-year horizon)	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 15,000,000	Columbia & Cascade	Unknown
TRANS-0893	TBD	North Devine Road - South of Mill Plain Boulevard to MacArthur Boulevard	South of Mill Plain Boulevard	MacArthur Boulevard	Arterial Improvements	Future	Unfunded	Heights District Plan recommended roadway changes to improve safety and support multi-modal mobility, including a two-way protected mobility lane on the west side of the street, improved ADA access and sidewalks, larger planter strips, and enhanced crossings. Sidewalk improvements along Devine being constructed as part of TRANS-871. (Outside 6-year horizon)	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 4,000,000	Columbia	Unknown
TRANS-0894	TBD	Andresen Road - East Mill Plain Boulevard to Highland Drive	East Mill Plain Boulevard	Highland Drive	Arterial Improvements	Future	Unfunded	Roadway changes to improve safety and support multi-modal mobility. Includes reducing the travel lanes from four to two just south of Mill Plain, adding protected mobility lanes, widening sidewalks and adding planter strips, improving ADA access pedestrian crossings at Wichita, Missouri and Louisiana. (Outside 6-year horizon)	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 10,000,000	Columbia & Cascade	Unknown
TRANS-0895	TBD	MacArthur Boulevard at North Devine Road Roundabout			Arterial Improvements	Future	Unfunded	Heights District Plan recommended roadway changes - Construct roundabout to optimize multimodal traffic safety and operations with additional trips generated by redevelopment in the Heights District. (Outside 6-year horizon)	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Columbia	Unknown
TRANS-0896	TBD	MacArthur Boulevard at North Andresen Road Roundabout			Arterial Improvements	Future	Unfunded	Heights District Plan recommended roadway changes. Construct roundabout to optimize multimodal traffic safety and operations with additional trips generated by redevelopment in the Heights District. (Outside 6-year horizon)	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Columbia & Cascade	Unknown
TRANS-0898	PRJ100386	Northeast 115th Avenue Extension - 16th Street to 18th Street	Northeast 16th Street	Northeast 18th Street	Arterial Improvements	Active	Partially Funded	This project proposes a new road connecting Northeast 16th Street and Northeast 18th Street in the vicinity of Four Seasons Lane and Joe's Place Farms. This is partially funded through $250,000 developer contribution and will require ROW from Joe's Place Farms and Bonneville Power Administration.	Complete street network connection and loop two dead end streets. Identified through the development review process.	Near-term	No		$ 970,500	Cascade	Unknown
TRANS-0899	PRJ100672	Northeast Fourth Plain Boulevard - Enhanced Pedestrian Crossings (SS4A)			Active Transportation	Active	Funded	Pedestrian and ADA accessible improvements on East Fourth Plain Boulevard east of Fort Vancouver Way. Improvements include a HAWK beacon and pedestrian refuges on Fourth Plain Boulevard west of Reserve Street and Fourth Plain Boulevard at Neals Lane.	Northeast Fourth Plain enhanced pedestrian crossings to improve pedestrian safety and transit access. Originated from Fourth Plain Corridor Subarea Plan (2007), Fourth Plain Forward Action Plan (2015), Fourth Plain Pedestrian Safety and Access Implementation Strategy (2017).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 770,000	Columbia	2026
TRANS-0903	TBD	Northeast 9th Street Infill Sidewalk - Northeast 112th Avenue to Northeast 136th Avenue	Northeast 112th Avenue	Northeast 136th Avenue	Active Transportation	Future	Unfunded	This project will add new sections of sidewalk infill along Northeast 9th Street, between Northeast 112th Avenue and Northeast 136th Avenue. (Outside 6-year horizon)	Identified through our Sidewalk Management Program.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 500,000	Cascade	Unknown
TRANS-0905	TBD	Amtrak Multimodal Access - West 11th Street	Hill Street (Amtrak Station)	King Street	Active Transportation	Future	Unfunded	This project will provide multimodal mobility lanes and pedestrian access along West 11th Street from King Street to the Amtrak Station.	Provides multi-modal access to the Amtrak Station. Originated from Vancouver City Center Vision Plan (2007).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 10,000,000	Columbia	Unknown
TRANS-0907	TBD	Northeast 124th Avenue - Northeast 28th Street to Northeast 39th Street	Northeast 28th Street	Northeast 39th Street	Arterial Improvements	Future	Unfunded	Reconstruction/Upgrade existing two lane Collector roadway to current standards, to include sidewalks, ADA ramps, mobility lanes and streetlights.	Upgrade existing two lane Collector roadway to increase safety, mobility, accessiblity and level of service. Identified through the development review process.	Near-term	No		$ 10,000,000	Pacific	Unknown
TRANS-0909	TBD	Southeast 29th Street - Southeast 176th Avenue to Southeast 192nd Avenue	Southeast 176th Avenue	Southeast 192nd Avenue	Arterial Improvements	Future	Unfunded	New 3-lane road built to principal arterial standards, to improve capacity, service and safety. Improvements include 3-lane principal arterial (1 lane each direction plus turn lane) with mobility lanes, streetlights, sound walls (where required), sidewalk and ADA ramps, and shared use pathway on south side of street. Developer built through developer contributions for the Vancouver Innovation Center project. (Outside 6-year horizon)	Long planned new east-west arterial for capacity, demand management and bike/pedestrian access inside the Vancouver Innovation Center project area.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 10,000,000	Cascade	Unknown
TRANS-0910	PRJ100914	Hazel Dell Avenue and Burnt Bridge Creek Trail Crossing Improvements			Active Transportation	Active	Funded	The Burnt Bridge Creek Trail Crossing at Hazel Dell Avenue does not have mobility crossings between the BBC trail in the City on the east side of Hazel Dell Avenue and the BBC trail in the County on the west side of Hazel Dell Avenue Safety is a major concern for users of the facility as there are not designated crossings and the curvature of the road at this location and operating speed of vehicles is dangerous for non-driving, vulnerable road users.	The Project would increase safety for current and future users to access trails and recreation opportunities and increase connections between City and County resources for all users across the facility. Identified by staff and the public.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 700,000	$ 1,000,000	Columbia	2026
TRANS-0911	TBD	Northeast Padden Expressway and Northeast Andresen Road Intersection Improvements			Active Transportation	Future	Unfunded	Intersection improvements for capacity, pedestrian safety and traffic standards. Intial planning phase to include congestion and collision study, to propose traffic improvements and alternatives to improve safety and reduce collisions. (Outside 6-year horizon)	Southbound Andreson to eastbound Padden turn volumes currently exceed the intersection capacity. Identified by staff.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 10,000,000	Pacific	Unknown
TRANS-0913	TBD	MacArthur Boulevard and South Blandford Drive Pedestrian Crossing			Active Transportation	Future	Unfunded	Install enhanced pedestrian crossing to improve pedestrian safety and accesssibility in the area. Originated from Heights District Plan (2020). (Outside 6-year horizon)	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Columbia	Unknown
TRANS-0914	PRJ101245	Lincoln Elementary School Crossing Improvements (SRTS)			Active Transportation	Future	Funded	Install high-visibility crosswalk, stop line at uncontrolled crosswalks, rectangular rapid flashing beacon, "Stop for Pedestrian" signs, ADA curb ramps, accessible pedestrian signals near Lincoln Elementary School at West 39th Street and Daniels Street.	Improve safety and accessiblity. Identified by staff and the public.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 300,000	$ 300,000	Columbia	2026
TRANS-0915	TBD	Fruit Valley Road and Firestone Lane Pedestrian Crossing			Active Transportation	Future	Unfunded	Install enhanced pedestrian crossing to improve pedestrian safety and accesssibility in the area. (Outside 6-year horizon)	Originated from Fruit Valley Subarea Plan (2010).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Columbia	Unknown
TRANS-0916	TBD	West 16th Street at Northwest Packing Company Pedestrian Crossing			Active Transportation	Future	Unfunded	Install enhanced pedestrian crossing to improve pedestrian safety and accesssibility in the area. (Outside 6-year horizon)	Originated from Fruit Valley Subarea Plan (2010).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Columbia	2023

Project ID	Workday ID	Project Name	Project Extent - Start	Project Extent - End	Project Type	Project Status	Funding Status	Project Description	Project Justification	Priority Score	Grant Fund?	Grant Amount	Estimated Total Cost	Traffic Impact Fees Area	Estimated Start of Construction
TRANS-0920	PRJ100802	McGillivray Complete Street and Paving Project - Chkalov Drive to Northeast 164th Avenue	Chkalov Drive	Northeast 164th Avenue	Active Transportation	Active	Funded	The McGillivray Boulevard Complete Street Project explored opportunities to make McGillivray Boulevard safer and more comfortable for everyone to travel between Southeast Chkalov Drive and Southeast 164th Avenue. The Project evaluated how McGillivray Boulevard can better meet the needs of people walking, biking, using a mobility device, and driving. The Project explored opportunities and examine tradeoffs to improve safety on the corridor ahead of the pavement project planned to occur in 2026.	Improving safety, mobility, and providing additional modal choices for road users. Identified by project team and recommended by the Transportation and Mobility Commission.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 7,500,000	Cascade	2026
TRANS-0921	PRJ100923	Northeast 112th Avenue Complete Street and Paving Project - Mill Plain Boulevard to Northeast 28th Street	Mill Plain Boulevard	Northeast 28th Street	Active Transportation	Active	Funded	The Northeast 112th Avenue Complete Street Project between Mill Plain Boulevard and 28th Street will repave and restripe to one general purpose lane, center turn lane, widen travel lanes and add buffered/protected mobility lane between Mill Plain Boulevard and 18th Street. Repave road and match existing configuration between 18th and 28th Streets.	The Northeast 112th Avenue Complete Street Project explore the major street retrofit on 112th Avenue between Mill Plain Boulevard and 28th Street, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 4,000,000	$ 3,500,000	Pacific & Cascade	2027
TRANS-0924	PRJ100805	Saint Johns/Saint James Complete Street and Paving Project - Fourth Plain Boulevard to City Limits	Fourth Plain Boulevard	City Limits	Active Transportation	Future	Unfunded	The Saint Johns/Saint James Complete Street and Paving Project includes design concept options to create and implement safety and mobility improvements. The project limits include Saint Johns Boulevard from Fourth Plain Boulevard to State Route-500, Saint James Road from State Route-500 to City Limits, and Fort Vancouver Way from Fourth Plain Boulevard to Saint Johns Boulevard.	These streets have documented safety issues and vulnerable street users. This project was identified by City Council as a priority corridor in the Complete Streets Policy and as a commercial corridor in the Comprehensive Plan. Concept Design Options Corridor Plan outlines improvements over time and was recommended by the TMC.	Near-term	No		$ 8,000,000	Columbia	Unknown
TRANS-0926	TBD	Southeast 164th Avenue Safety/Mobility Improvements - Tech Center Drive to Southeast 1st Street	Tech Center Drive	Southeast 1st Street	Active Transportation	Future	Unfunded	Southeast 164th Avenue is the site of two top priority crash locations, the segment between Southeast 1st Street and Mill Plain Boulevard and the intersection with Southeast Tech Center Drive/12th Street. There have been three fatalities and two severe injuries on the segment and at the intersection, and four additional pedestrian injuries at the intersection. The project will include elements to address crash factors, such as treatments related to signal phases, intersection configurations, pavement markings, installation of refuge islands or raised crossings, and other measures. (Outside 6-year horizon)	Improving safety and mobility. Identified from the Transportation System Safety Analysis (2018) and Local Road Safety Plan (2022).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Cascade	Unknown
TRANS-0927	TBD	Northeast 187th Avenue - Southeast 1st Street to Northeast 18th Street	Southeast 1st Street	Northeast 18th Street	Arterial Improvements	Future	Unfunded	New 3-lane collector/minor arterial (1 lane each direction plus center turn lane) with sidewalks, mobility lanes, streetlights, signals, school crossings, stormwater and sound walls where required.	Project addresess capacity, safety conditions and providing multimodal access. Identified by Section 30 Subarea Plan.	Medium-term	No		$ 13,000,000	Cascade	Unknown
TRANS-0928	TBD	Northeast 13th Street - Northeast 172nd Avenue to Northeast 187th Avenue	Northeast 172nd Avenue	Northeast 187th Avenue	Arterial Improvements	Future	Unfunded	New 3-lane collector/minor arterial (1 lane each direction plus center turn lane) with sidewalks, mobility lanes, streetlights, signals, school crossings, stormwater and sound walls where required.	Project addresess capacity, safety conditions and providing multimodal access. Identified by Section 30 Subarea Plan.	Long-term	No		$ 18,000,000	Cascade	Unknown
TRANS-0931	TBD	Northeast 162nd Avenue and Northeast 9th Street Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	The Northeast 162nd Avenue and Northeast 9th Street Intersection Improvements will include a signalized intersection and the east leg of the intersection will be striped to provide a westbound left-turn lane. (Outside 6-year horizon)	Improving safety and mobility. This project is taking on the recommendations from the Section 30 Traffic Study.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 500,000	Cascade	Unknown
TRANS-0932	TBD	Northeast 172nd Avenue and Northeast 9th Street Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	The Northeast 172nd Avenue and Northeast 9th Intersection Improvements will include a signalized intersection or a single lane roundabout. (Outside 6-year horizon)	Improving safety and mobility. This project is taking on the recommendations from the Section 30 Traffic Study.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 500,000	Cascade	Unknown
TRANS-0936	TBD	Mill Plain Boulevard and Hearthwood Boulevard Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	Mill Plain Boulevard and Hearthwood Boulevard are each wide arterials whose intersection had seen crashes that resulted in severe and fatal injuries. The confluence of transit, heavy vehicle traffic on Mill Plain Boulevard, and permissive left turns across the path of pedestrians and mobility users have led to crashes that resulted in severe and fatal injuries. The project will include elements to address crash factors, such as treatments related to signal phases, intersection configurations, pavement markings, and other measures.	Improving safety, mobility, and providing additional modal choices for road users. Identified from the Transportation System Safety Analysis (2018) and Local Road Safety Plan (2022).	Near-term	No		$ 500,000	Cascade	Unknown
TRANS-0937	TBD	Southeast Westridge Boulevard and Southeast 1st Street Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	The Southeast Westridge Boulevard and Southeast 1st Street intersection improvements will include a signalized intersection.	Improving safety and mobility. Identified through the development review process.	Medium-term	No		$ 1,500,000	Cascade	Unknown
TRANS-0938	PRJ101031	Mill Plain/MacArthur Intersection Improvements	East Mill Plan Boulevard	Blandford Drive	Arterial Improvements	Active	Funded	Heights District Plan recommended roadway changes to improve safety, support multi-modal mobility, and add a linear greenbelt. Includes moving vehicle travel to the east side of the median and converting the west side to separated mobility lanes and pedestrian facilities, and open space. Will include improved ADA access and pedestrian crossings at Blanford, Phoenix, Texas and Burdick.	Provide economic development and improve access and mobility. Originated from Heights District Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 4,000,000	$ 10,000,000	Columbia	2026
TRANS-0941	TBD	Fourth Plain Boulevard Safety and Mobility - 121st Avenue to 127th Avenue	121st Avenue	127th Avenue	Active Transportation	Future	Unfunded	Fourth Plain Boulevard is one of the most dangerous roadways in the City, with high frequency and severity of crashes at several segments and intersections. The multimodal roadway sees people traveling in all modes, including vis bus rapid transit service. While the Fourth Plain Safety and Mobility Project will address several dangerous segments and intersections, the remaining intersection and segment are identified for safety improvements that could include roadway reconfigurations, changing signal phasing, installing lighting, and reducing crash exposure for vulnerable users. (Outside 6-year horizon)	Improving safety, mobility, and providing multimodal choices for road users. This project was identified in the Local Roads Safety Plan (2022) and Transportation System Safety Analysis (2018).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Pacific	Unknown
TRANS-0942	TBD	Southeast 192nd Avenue and Mill Plain Boulevard Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	Project elements will look at crash countermeasures related to high traffic volumes, number of commercial driveways, roadway configurations and insufficient infrastructure for pedestrians or mobility users. (Outside 6-year horizon)	Improve safety, mobility and provide mulitmodal access. Originated from Transportation System Safety Analysis (2018) and Local Road Safety Plan (2022).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 500,000	Cascade	Unknown
TRANS-0943	PRJ100922	Garrison Road Sidewalk Infill - Mill Plain to Northeast 12th Street	Mill Plain Boulevard	Northeast 12th Street	Active Transportation	Active	Funded	Install sidewalks and ADA ramps along Garrison Road from Mill Plain to David Douglas Park/Northeast 12th Street.	Improve safety and mobility. Identified by staff and public with support from WSDOT.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 1,000,000	$ 1,600,000	Cascade	2026
TRANS-0944	PRJ101098	Grand Loop Infrastructure Improvements			Arterial Improvements	Active	Funded	Pursuant to the Heights District Master Plan, construct a network of street, pedestrian and mobility improvements that form a loop around the central core of the Tower Mall Redevelopment Area, providing connections between MacArthur Boulevard, Devine Road and Mill Plain Boulevard.	Improve safety, mobility and provide mulitmodal access. Project originated from the Heights District Master Plan (2020).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 20,000,000	Columbia	2026
TRANS-0945	TBD	East 18th Street Mobility Lane Improvements and Traffic Calming - Grand Boulevard to Northeast Burton Road	Grand Boulevard	Northeast Burton Road	Active Transportation	Future	Unfunded	Improve safety and comfort of mobility lanes on East 18th Street between Grand Boulevard and Northeast Burton Road through the addition of a buffer zone and vertical elements where feasible. Explore narrowing existing travel lanes to slow vehicle traffic and create space for buffer, as well as other traffic calming treatments such as lowering the posted speeds. (Outside 6-year horizon)	Improve safety and mobility. This project originated in the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 2,000,000	Columbia & Cascade	Unknown
TRANS-0946	PRJ100959	Fourth Plain - 62nd - Andresen Multiuse Path	East 62nd Avenue	Andresen Road	Active Transportation	Future	Partially Funded	Build an off-street multiuse facility between Northeast 62nd Avenue and Northeast Andresen Road to serve mobility users traveling along the corridor. Expand existing sidewalk on either north or south side of the road at the back of sidewalk to create additional space to be share with other mobility users. Use emblems or materials to differentiate between pedestrian and mobility user zones.	Improve safety, mobility and provide mulitmodal access. This project originated in the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).	Near-term	No		$ 8,400,000	Columbia	Unknown
TRANS-1115	PRJ101246	Image Elementary School Pedestrian Crossing Improvements (SRTS)	Northeast 52nd Street	Northeast 135th Avenue	Signal & Transportation Improvements	Future	Funded	Install high-visibility crosswalk, stop line at uncontrolled crosswalks, "Stop for Pedestrian" signs, rectangular rapid flashing beacon, pedestrian and bicyclist crossing illumination, pedestrian and bicyclist segment illumination, and curb extension at Image Elementary School from Northeast 52nd Street and Northeast 135th Avenue.	To improve pedestrian safety and access. Identified by staff and the public.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 292,000	$ 292,000	Pacific	2027
TRANS-1117	PRJ101190	Fourth Plain Boulevard and Laurel Place Pedestrian Crossing (SS4A)			Signal & Transportation Improvements	Active	Funded	Install enhanced pedestrian crossing to improve pedestrian safety and accessiblity.	To improve pedestrian safety and access. Identified in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 400,000	$ 500,000	Columbia	2026
TRANS-1118	PRJ101190	Fourth Plain Boulevard and Watson Avenue Pedestrian Crossing (SS4A)			Signal & Transportation Improvements	Active	Funded	Install enhanced pedestrian crossing to improve pedestrian safety and accessiblity.	To improve pedestrian safety and access. Identified in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 400,000	$ 500,000	Columbia	2026
TRANS-1119	PRJ101244	Walnut Grove Elementary School Sidewalk and Pedestrian Crossing Improvements (SRTS)	Van Mall Drive	Walnut Grove Elementary	Active Transportation	Future	Funded	Install high-visibility crosswalk, stop line at controlled crosswalks, pedestrian and bicyclist crossing illumination, ADA curb ramps, accessible pedestrian signals, sidewalk with planted buffer, speed cushions at Walnut Grove Elementary School along Northeast 72nd Avenue.	To improve pedestrian safety and access. Identified by staff and by the public.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 2,000,000	$ 2,000,000	Columbia	2027

Project ID	Workday ID	Project Name	Project Extent - Start	Project Extent - End	Project Type	Project Status	Funding Status	Project Description	Project Justification	Priority Score	Grant Fund?	Grant Amount	Estimated Total Cost	Traffic Impact Fees Area	Estimated Start of Construction
TRANS-1120	PRJ101190	Z Street Sidewalk Improvements - Fourth Plain Boulevard to Northeast 26th Street (SS4A)	Fourth Plain Boulevard	Northeast 26th Street	Active Transportation	Active	Funded	This project will add new sections of sidewalk infill along Z Street from Fourth Plain Boulevard to Northeast 26th Street.	To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 347,500	$ 447,500	Columbia	2026
TRANS-1121	PRJ101190	Neals Lane Sidewalk Extension - East 24th Street to East 28th Street (SS4A)	East 24th Street	East 28th Street	Active Transportation	Active	Funded	This project extends the sidewalk along Neals Lane from East 24th Street to East 28th Street.	To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 535,000	$ 635,000	Columbia	2026
TRANS-1122	PRJ101190	Rossiter Lane to Burnt Bridge Creek Pedestrian Connector (SS4A)			Active Transportation	Future	Funded	This project will add a pedestrian bridge crossing to create a new connection to the Burnt Bridge Creek Trail.	To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 1,000,000	$ 1,647,500	Columbia	2026
TRANS-1123	PRJ101190	Todd Road Sidewalk Infill - Fourth Plain Boulevard to 18th Street (SS4A)	Fourth Plain Boulevard	18th Street	Active Transportation	Future	Funded	This project will add new sections of sidewalk infill along Todd Road from Fourth Plain Boulevard to 18th Street.	To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 535,000	$ 635,000	Columbia	2026
TRANS-1124	PRJ101190	Stapleton Road Mobility Improvements - State Route-500 to 18th Street (SS4A)	Fourth Plain Boulevard	18th Street	Active Transportation	Future	Funded	Restripe Stapleton Road from State Route-500 to 18th Street to create a buffered mobility lanes in both north and sourthbound directions by eliminating existing vehicle center turn lane.	To improve mobility access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 800,000	$ 1,000,000	Columbia	2026
TRANS-1127	PRJ101190	34th Street Sidewalk Connection (SS4A)	Fourth Plain Boulevard	Northeast 34th Street	Active Transportation	Future	Funded	New north-south pedestrian access between Fourth Plain Boulevard and Northeast 34th Street (within Northeast 57th Avenue and Northeast 62nd Avenue). Exact location have not yet been determined.	To improve pedestrian safety and access in the Fourth Plain Forward Pedestrian Safety and Access Implementation Strategy and funding in the City's USDOT Safe Streets and Roads for All package.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 335,000	$ 435,000	Columbia	2027
TRANS-1128	TBD	Brandt Road Traffic Calming - Fourth Plain Boulevard to East 18th Street	Fourth Plain Boulevard	East 18th Street	Active Transportation	Future	Unfunded	Install traffic calming treatments on Brandt Road to improve safety for users. Improve safety and visibility of mobility lanes by restriping where needed and refreshing bicycle road markings. (Outside 6-year horizon)	To improve safety and mobility access. Originated from the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 100,000	Columbia	Unknown
TRANS-1129	TBD	North Grand Boulevard Traffic Calming - Fourth Plain Boulevard to East 18th Street	Fourth Plain Boulevard	East 18th Street	Active Transportation	Future	Unfunded	Install traffic calming treatments on Grand Boulevard to improve safety for users. (Outside 6-year horizon)	To improve safety and mobility access. Originated from the Fourth Plain and Fort Vancouver Way Safety and Mobility Project (2023).	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 100,000	Columbia	Unknown
TRANS-1131	TBD	Safe Routes to School	Citywide		Program	Future	Funded	New program implemented Citywide in 2025. Work with schools to analyze school walking routes, gaps and safety issues to develop safe route projects. Program budget $200,000 per year.	Develop safety and education programs in partnership with schools, neighbors, community organizations and agencies to increase safety and improve health for students and their families.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing
TRANS-1132	TBD	City Safety Program	Citywide		Program	Future	Unfunded	New program to be implemented Citywide. Provide resources to develop a comprehensive City safety program, which would include: management of the citywide collision dashboard, regular review of safety data and design of rapid response projects, response to collision hotspots identified through the Local Road Safety Plan, and high collision corridor. Program budget to be determined.	To improve overall traffic safety by identifing patterns and high collusions areas, then ulitmately resulting in future TIP projects to resolve these issues.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Unknown
TRANS-1133	TBD	Lighting for Pedestrian Safety Program	Citywide		Program	Future	Unfunded	New program to be implemented Citywide. Create GIS inventory of high-need locations based on pedestrian activity, locations of mid-block enhanced pedestrian crossings, locations that need additional crossings/lighting, high ridership bus stops, roadway characteristics, and crash data. Develop policy to prioritize installation and incorporate into development review. Program budget to be determined.	To improve pedestrian safety by identifing patterns and high need areas, then ulitmately resulting in future TIP projects to resolve these issues.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Unknown
TRANS-1134	TBD	Automated Enforcement Program	Citywide		Program	Future	Unfunded	New program to be implemented Citywide. Develop program, community outreach, pilot testing, coordinate with Vancouver Police Department, and address equity considerations. Program budget to be determined.	Included in TSP and now enabled for expanded use at state level.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Unknown
TRANS-1135	TBD	Pedestrian/Bike/Small Mobility Wayfinding Program	Citywide		Program	Future	Unfunded	New program to be implemented Citywide. Program budget to be determined.	To improve pedestrian safety and mobility access.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Unknown
TRANS-1143	TBD	Northeast Andresen Road Sidewalk - Northeast 78th Street to Northeast 84th Street	Northeast 78th Street	Northeast 84th Street	Active Transportation	Future	Unfunded	This project includes new sidewalk and mobility improvements along Northeast Andresen Road from Northeast 78th Street to Northeast 84th Street. (Outside 6-year horizon).	To improve pedestrian safety and mobility access. Identified by staff and public.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 1,000,000	Pacific	Unknown
TRANS-1350	TBD	112th Avenue/Chkalov Drive Complete Street and Paving Project - Northeast 28th Street to Northeast 51st Street	Northeast 28th Street	Northeast 51st Street	Active Transportation	Future	Partially Funded	The Northeast 112th Avenue Complete Street Project between 28th Street and 51st Street will repave and restripe to add standard bicycle and small mobility lane. Configure alternate route Neighborhood Greenway with traffic calming treatments, and wayfinding signage. Shared lane markings between: 106th and 110th Avenue, Morrow Road, Four Seasons Lane, and two-way 12 foot shared use path one east side between 18th and 51st Streets (long term).	The Northeast 112th Avenue Complete Street Project will explore a major street retrofit on 112th Avenue between 28th Street and 51st Street, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.	Near-term	No		$ 3,975,000	Pacific	2028
TRANS-1351	TBD	112th Avenue/Chkalov Drive Complete Street Project - Southeast 3rd Street to McGillivray Boulevard	Southeast 3rd Street	Southeast McGillivray Boulevard	Active Transportation	Future	Unfunded	The project will include road reconfiguration, protected bike and small mobility lane, pavement markings, signage, traffic signal modification, enhanced pedestrian crossing, ADA ramps.	The Northeast 112th Avenue Complete Street Project will explore a major street retrofit on 112th Avenue between Southeast 3rd Street and McGillivray Boulevard, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.	Near-term	No		$ 1,300,000	Cascade	Unknown
TRANS-1352	PRJ101097	Upper Main Street Complete Street and Paving Project - East 39th to Northeast 45th Street/Hazel Dell	East 39th Street	Northeast 45th Street/Hazel Dell	Active Transportation	Future	Funded	The Upper Main Street Complete Street Project between 37th Street to City Limits will repave and restripe. Strategic improvements are incorporated throughout the length of the project and they include: curb ramp upgrades, a southbound mobility lane between 39th and 40th Streets, a two way bikeway between 40th and the Covington House driveway exit, a multiuse path between the Covington House driveway and 45th Street, new marked crossings, a RRFB beacon and median island at 39th and F Street, shared lane markings along F Street between 39th and 40th Street, new marked crossings at 40th and F Street and removal of a northbound travel lane and widen other travel lanes to accommodate buses. Improvements to be coordinated with C-TRAN Highway 99 BRT project.	Improving safety, mobility, and providing additional modal choices for road users. Identifed by staff.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 1,500,000	$ 4,000,000	Columbia	2026
TRANS-1353	TBD	East 33rd Street Complete Street & Paving Project - I-5 to Kauffman Avenue and Saint Johns Boulevard to Grand Boulevard			Active Transportation	Future	Unfunded	The East 33rd Street Complete Street Project is between Interstate-5 overpass to Kauffman Avenue and Saint Johns Boulevard to Grand Boulevard will repave and restripe. Improvements will include: lower speed limits, remove on street parking east of Main Street except for the north side of 33rd Street between Main and F Street and add buffered mobility lanes, remove median island at F Street and add RRFB beacon with a raised crossing or speed cushions approaching the crossing, intersection improvements at 33rd and Grand, and add speed humps and shared lane markings between Kauffman and Main Street. Consider removing on street parking and adding buffered mobility lanes between Main and Columbia based on traffic volumes and speeds.	This project will explore major mobility improvements and complete streets retrofits as there are well documented safety issues and vulnerable street users. This will be a combined efforts with East 29th Street Complete Street Project. Identified by staff and recommended by the Transportation and Mobility Commission.	Near-term	No		$ 2,000,000	Columbia	Unknown
TRANS-1354	TBD	East 29th Street Complete Street and Paving Project - I-5 to Kauffman Avenue and Saint Johns Boulevard to Neals Lane			Active Transportation	Future	Unfunded	The East 29th Street Complete Street and Paving Project between Interstate-5 overpass to Kauffman and Saint Johns Boulevard to Neals will lower speed limit. Add speed cushions and shared lane markings. Improve crossing at Grand Boulevard with pedestrian island and bicycle crossing. Install traffic circles at Franklin, F and Z Streets and Watson Ave. Fill sidewalk gaps east of X Street. Remove on street parking at intersection corners of Columbia and Kauffman. Add wayfinding signage for people walking, rolling and biking.	This project will explore major mobility improvements and complete streets retrofits as there are well documented safety issues and vulnerable street users. This will be a combined efforts with East 33rd Street Complete Street Project. Identified by staff and recommended by the Transportation and Mobility Commission.	Near-term	No		$ 700,000	Columbia	Unknown
TRANS-1357	PRJ101087	Northeast 86th/Northeast 87th Avenues Safety and Mobility Complete Street	Fourth Plain Boulevard	Mill Plain Boulevard	Active Transportation	Future	Partially Funded	Safety and Mobility planning project in coordination with planned pavement preservation work at Northeast 86th/87th Avenue from Fourth Plain Boulevard to Mill Plain Boulevard.	Improving safety, mobility, and providing additional modal choices for road users.	Near-term	No		$ 2,100,000	Pacific & Cascade	2027
TRANS-1358	PRJ101088	Northeast 72nd Avenue Safety and Mobility Complete Street	Northeast 40th Street	Northeast 78th Street	Active Transportation	Future	Partially Funded	Safety and Mobility planning project in coordination with planned pavement preservation work at Northeast 72nd Avenue from Northeast 40th Street to Northeast 78th Street.	Improving safety, mobility, and providing additional modal choices for road users.	Near-term	No		$ 1,500,000	Pacific	2027
TRANS-1359	PRJ101089	Northeast 97th/98th Avenues Safety and Mobility Complete Street	Northest Burton Road	Mill Plain Boulevard	Active Transportation	Future	Partially Funded	Safety and Mobility planning project in coordination with planned pavement preservation work at Northeast 97th/98th Avenue from Northeast Burton Road to Mill Plain Boulevard.	Improving safety, mobility, and providing additional modal choices for road users.	Near-term	No		$ 1,700,000	Pacific & Cascade	2027
TRANS-1361	PRJ101287	Curb Ramps Retrofits	Citywide		Program	Active	Funded	New program to be implemented Citywide. This program will help retrofit curb ramps to meet current standards. Program budget $2.5M per year.	To improve pedestrian safety and access.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No			N/A	Ongoing

Project ID	Workday ID	Project Name	Project Extent - Start	Project Extent - End	Project Type	Project Status	Funding Status	Project Description	Project Justification	Priority Score	Grant Fund?	Grant Amount	Estimated Total Cost	Traffic Impact Fees Area	Estimated Start of Construction
TRANS-1364	Varies	Fourth Plain for All (ARPA)			Active Transportation	Active	Funded	The Fourth Plain for All transportation investment ($4.2 million, federal funds ARPA) will improve safety by providing traffic calming on neighborhood streets, lighting, and pedestrian infrastructure on neighborhood streets.	This project is a community-driven process to identify, prioritize, and implement a community vision that will improve conditions and expand opportunities for central Vancouver neighborhoods. This project seeks to address impacts from COVID-19 as well as long-standing disparities to foster a more prosperous and resilient community that thrives into the future.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	Yes	$ 4,000,000	$ 4,250,000	Columbia	2026
TRANS-1367	PRJ101033	9th Street Illumination Project	Fircrest Elementary	Northeast 128th Avenue	Signal & Transportation Improvements	Future	Unfunded	This project will add illumination to the marked crosswalk along Northeast 9th Street at the following locations: across from Fircrest Elementary, 123rd Avenue, 125th Avenue, 127th Avenue, and 128th Avenue. This project is developer funded.	Improve pedestrian safety and mobility access.	Near-term	No		$ 225,000	Cascade	Unknown
TRANS-1368	PRJ101231	Mill Plain and Devine Intersection Improvements			Arterial Improvements	Future	Partially Funded	Heights District Plan recommneded roadway changes to improve safety and support multi-modal mobility. Improvements are along Devine Road from south of Mill Plain Boulevard to Idaho Street and along Mill Plain Boulevard from Blanford Drive to about 200 feet east of Devine Road.	Heights District Plan recommendations for redevelopment. Roadway changes to improve safety and support multi-modal mobility. Originated from Heights District Plan (2020).	Near-term	No		$ 6,250,000	Columbia	Unknown
TRANS-1427	TBD	Northeast 78th Street and Northeast 72nd Avenue Intersection Improvements			Signal & Transportation Improvements	Future	Unfunded	This project consist of a new stop controlled device at the intersection of Northeast 78th Street and Northeast 72nd Avenue. Analysis to be conducted to determine stop control device (all-way stop or signal).	Improving safety and mobility. Identified by resident and staff.	Near-term	No		$ 500,000	Pacific	Unknown
TRANS-1428	TBD	West 11th Street/BNSF Crossing Grade Separation Project			Active Transportation	Future	Unfunded	This project will provide a multimodal grade separation access across rail crossing at West 11th Street to further increase safety.	Improving safety and mobility. Identified by staff.	Near-term	No		$ 2,500,000	Columbia	Unknown
TRANS-1429	TBD	Northeast 112th Avenue Off Street Path – Northeast 18th Street to Northeast 51st Street	Northeast 18th Street	Northeast 51st Street	Active Transportation	Future	Unfunded	This off street path project will provide multi modal access along the east side of Northeast 112th Avenue from Northeast 18th Street to 51st Street.	Improving safety and mobility. Identified by staff.	Funded, unfunded projects outside the 6-year horizon, and programs were not scored.	No		$ 8,500,000	Pacific	Unknown
TRANS-1430	TBD	Northeast 112th Avenue/Southeast Chkalov Drive Complete Street Project Northeast 2nd Street to Southeast 3rd Street	Northeast 2nd Street	Southeast 3rd Street	Active Transportation	Future	Unfunded	The Northeast 112th Avenue Complete Street Project between Northeast 2nd Street and Southeast 3rd Street. The project will include grading, walls, shared-use paths, ADA ramps, curb and gutter, traffic signal modification, pavement markings, signage, landscaping.	The Northeast 112th Avenue Complete Street Project will explore a major street retrofit on 112th Avenue between Northeast 2nd Street and Southeast 3rd Street, a street with well documented safety issues and vulnerable street users. Identified by 112nd Avenue Subarea Plan.	Near-term	No		$ 4,500,000	Cascade	Unknown

For additional information, please visit the TIP and Street System - Needs and Strategies websites.

To request other formats, please contact:

Vancouver Public Works

360-487-7130 | TTY: 360-487-8602

Este informe contiene información importante. Pídale a alguien que se lo traduzca o llame Ciudad de Vancouver, 360-487-7130.

В данном отчете содержится важная информация. Попросите кого-нибудь перевести ее для вас или звоните City of Vancouver, 360-487-7130.

Báo cáo này có thông tin bổ sung về dự án. Hãy nhờ người khác giải thích cho quý vị hoặc gọi cho City of Vancouver, 360-487-7130.







CITY OF Vancouver WASHINGTON

Staff Report: 106-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
Contract Award - 2026 Resurfacing Project - C-102284

Key Points

- The City maintains approximately 1,900 lane miles of streets in its system.
- The City's annual resurfacing and preventive maintenance contracts are the primary way that asphalt streets receive maintenance work.
- City maintenance crews do not have the capacity to do this amount of paving work during the paving season of late-spring to early-fall.

Strategic Plan Alignment
Transportation and Mobility – a safe, future-ready and convenient transportation system

Present Situation
The 2026 Resurfacing Project is being constructed as part of the Pavement Management program. This project involves paving with hot mix asphalt on residential streets at various locations throughout the City. This year's total pavement management program includes two separate resurfacing contracts. A total of 18 lane miles of street would be paved under those contracts. These contracts include the "2026 Resurfacing Project" and the "W Fourth Plain Blvd – Mill Plain to Main St NHS (National Highway System) Resurfacing Project". This staff report is only for the 2026 Resurfacing Project. The second paving project was approved under a previous staff report.

The attached vicinity map shows which streets would be paved. The project includes paving streets in Edgewood Park, Vancouver Heights, Cascade Southeast and Cascade Highlands neighborhoods.

On April 28, 2026, the City received two bids for this project. The low bidder was responsive with a bid of $2,205,896. The bids are as follows:

SUMMARY OF BIDS	
BIDDER	**AMOUNT**
Granite Construction Company, Vancouver, WA	$2,205,896.00
Lakeside Industries, Vancouver, WA	$2,273,444.00
Engineers Cost Estimate	$2,800,000.00

There is a minimum apprenticeship goal of 15% of the utilized labor hours for this project. Granite Construction Company of Vancouver, WA, has submitted an Apprenticeship Utilization Plan to meet or exceed this goal by using approximately 369 hours of apprentice time of the estimated total of 2,454 applicable labor hours for this project.

Advantage(s)

1. Would result in new pavement on approximately 10 lane miles on City streets, protecting the City's investment in its street network.
2. Would reduce higher future maintenance costs on city streets.
3. Would follow through on commitments and improve neighborhood livability.

Challenge(s)

1. Neighborhood residents, businesses and local traffic will be inconvenienced during the construction period along the corridors; however, the construction duration is short, and lane closures will be limited, which will minimize the temporary inconvenience.
2. Construction will generate noise and dust in the work areas. To mitigate for noise, the contractor would be required to comply with a noise variance for nighttime work, although none is anticipated. The contractor will be required to implement a dust control and erosion control strategy at all locations.

Budget Impact

The project is funded through the Pavement Management Program ($2,205,896.00). Sufficient funds are budgeted to construct the project.

Prior Council Review

None

Action Requested

On Monday, June 1, 2026, award a construction contract for the 2026 Resurfacing Project to the lowest responsive bidder, Granite Construction Company, of Vancouver, WA, at the bid price of $2,205,896, which includes Washington State Sales tax, and authorize the City Manager, or designee, to finalize and execute the contract and authorize any legal action necessary to enforce the terms of the same.

Staff Contact

Chris Sneider, Senior Civil Engineer, chris.sneider@cityofvancouver.us

Attachments:

1. Contract
2. Vicinity Map

CONSTRUCTION CONTRACT # C-102284
BID 26-18: 2026 RESURFACING PROJECT

This Contract (hereinafter referred to as the "Contract") is entered into by and between the City of Vancouver, Washington, a municipal corporation organized under the laws of the State of Washington (hereinafter referred to as the "City") and Granite Construction Company, 16821 SE McGillivray Blvd, Vancouver, WA 98683 (hereinafter referred to as the "Contractor"). The City and the Contractor may be collectively referred to herein as the "Parties" or individually as a "Party."

WHEREAS, the City desires to engage the Contractor to provide public works construction and other related services for the work described herein;

WHEREAS, Contractor has agreed to offer its services to perform said work per the City issued Invitation to Bid (ITB) No. 26-18 and all addenda thereto, Contractor's Bid to said ITB, the Project Plan Set and Special Provisions, and City Council's approval on Monday, June 1, 2026 per Staff Report No. ##-##; and

WHEREAS, the Contractor represents by entering into this Contract that it is fully qualified to perform the work to which it will be assigned in a competent and professional manner, and to the standards required by the City.

NOW, THEREFORE, in consideration of the terms, conditions, covenants, and performance contained herein, or attached an incorporated and made a part hereof, the parties hereto agree as follows:

1. **STATEMENT OF WORK**: The Contractor hereby agrees to furnish all materials, labor, tools, machinery and implements of every description necessary to complete the work in a professional manner within the time limits stated in this Contract for the construction and installation of the following improvements and will make all necessary arrangements for the obtaining of permits from the United States, State of Washington, and/or any of its agencies as may be necessary to do the work required and covered by this Contract.

   This Contract provides for the improvement of streets within the City of Vancouver including pavement repairs, planing of roadways, paving of existing roads, minor utility adjustments, and temporary striping and other work, all in accordance with the attached Contract Plans, these Contract Provisions and the Standard Specifications, herein referred to as "Work".

   The Contract Work shall be Physically Complete within 25 Working Days from the Notice to Proceed.

2. **EFFECTIVE DATE:** This Contract is effective as of the last signature of the Contract.

3. **E-VERIFY PROGRAM:** Contractor shall register and enter into a Memorandum of Understanding (MOU) with the Department of Homeland Security E-Verify program within sixty days after execution of this Contract. Contractor shall ensure all Contractor employees and any subcontractor(s) assigned to perform work under this Contract are eligible to work in the United States. Contractor shall provide verification of compliance upon City request. Failure by Contractor to comply with this subsection shall be considered a material breach.

4. **CONTRACTOR RESPONSIBLITIES FOR SUBCONTRACTOR:** The Contractor shall include the language of this section in all tier subcontracts and shall require each of its subcontractors to include the same language of this section in each of their subcontracts, adjusting only as necessary the terms used for the contracting parties. The requirements of this section apply to all subcontractors regardless of tier. The Contractor shall require all subcontractors to comply with all federal, state and municipal laws, rules and regulations whatsoever.

   At any time of the subcontract execution, the Contractor shall verify that all tier subcontractors meet the following bidder responsibility criteria:

   a. Have a current certificate of registration in compliance with Chapter 18.27 RCW, which must have been in effect at the time of subcontract bid submittal.
   b. Have a current Washington Unified Business Identifier (UBI) number.
   c. Have received training on the requirements related to public works and prevailing wage as required by RCW 39.04.350.
   d. Within the three-year period immediately preceding the date of the bid solicitation, not have been determined by a final and binding citation and notice of assessment issued by the department of labor and industries or through civil judgement entered by a court of limited or general jurisdiction to have willfully violated, as defined in RCW 49.48.082, any provision of Chapter 49.46, 49.48 or 49.52 RCW.
   e. If applicable, have:
      i. Industrial Insurance (worker's compensation) coverage for the subcontractor's employees working in Washington, as required in Title 51 RCW.
      ii. A Washington Employment Security Department reference number, as required in Title 50 RCW.
      iii. A Washington Department of Revenue state excise tax registration number, as required in Title 82 RCW.
      iv. An electrical contractor license, if required by Chapter 19.28 RCW.
      v. An elevator contractor license, if required by Chapter 70.87 RCW.
   f. Not be disqualified from bidding on any public works contract under RCW 39.06.010 or 39.12.065(3).

5. **DELINQUENT STATE TAXES**: The Contractor shall not owe delinquent taxes to the Washington State Department of Revenue without a payment plan approved by the Department of Revenue.

6. **COMPENSATION AND SCHEDULE OF PAYMENTS**: In consideration of the promises and agreements of the Contractor as set forth herein, and in consideration of the faithful performance and furnishing of the work and materials required by this Contract to the satisfaction of the City, the City agrees to pay to the Contractor as prescribed in the solicitation and Contractor's Bid, and in accordance with the ordinances of the City of Vancouver and the laws of the State of Washington, the following sum as indicated, which amount does include 8.9% Washington State Sales Tax (if applicable) $ 2,205,896.00 USD.

   The amount finally to be paid is, however, variable upon the Work actually performed, and final payment will be made upon the basis of the amount of work performed and the materials furnished, and at the lump sum or unit prices fixed in the Contractor's Bid as modified by any and all approved Change Orders.

7. **CONTRACTOR'S INSURANCE**: The Contractor agrees to the following requirements relating to insurance coverage. Provide a Certificate of Liability Insurance. Said certificate must be provided on a standard "ACORD" form, or its equivalent, and must provide that coverage shall not be canceled or modified without 30 days prior written notice to the City of Vancouver.

   The City of Vancouver may inspect all policies, and copies shall be provided to the City upon request. The Contractor shall obtain the insurance described in this section from insurers approved by the State Insurance Commissioner pursuant to RCW Title 48. The insurance must be provided by an insurer with a rating of A-: VII or higher in the A.M. Best's Key Rating Guide, which is licensed to do business in the state of Washington (or issued as a surplus line by a Washington Surplus lines broker). The City reserves the right to approve or reject the insurance provided, based on the insurer (including financial condition), terms and coverage, the Certificate of Insurance, and/or endorsements.

   The Contractor agrees to procure insurance coverage as required below:

COVERAGE	LIMITS OF LIABILITY
I. Commercial General Liability:	
Policy shall include Bodily Injury, Property Damage, Personal Injury and Broad Form Contractual Liability	
Each Occurrence	$1,000,000
General Aggregate Per Occurrence	$2,000,000
Products & Completed Operations Aggregate	$2,000,000
Personal and Advertising Injury	$1,000,000
Blanket Contractual Liability	$1,000,000
II. Commercial Automobile Liability	
Policy shall include Bodily Injury and Property Damage, for any owned, Hired, and/or non-owned vehicles used in the operation, installation and maintenance of facilities under this Contract.	
Combined Single Limit	$1,000,000
III. Workers' Compensation (applicable to the State of Washington)	
Per Occurrence	Statutory
Employer's Liability	$1,000,000

COVERAGE	LIMITS OF LIABILITY
Disease Each Employee	$1,000,000
Disease Policy Limit	$1,000,000
Each Claim	$1,000,000
Annual Aggregate	$2,000,000
IV. Pollution Legal Liability	
Each Claim	$3,000,000
Annual Aggregate	$6,000,000

In addition to the coverage and limits listed above the Contractor's insurance must all contain the following:

a. City Listed as Additional Insured. The City of Vancouver, its Agents, Representatives, Officers, Directors, Elected and Appointed Officials, and Employees must be named as additional insured. The required Additional Insured endorsements shall be at least as broad as ISO CG 20 10 11 85, or its equivalent CG 20 10 07 04 and CG 20 37 07 04 must be included with the Certificate of Insurance.

b. Either the Commercial General Liability or the Worker's Compensation policy must be endorsed to include "Washington Stop Gap" insurance. The limits and aggregates referenced must apply to the Stop Gap coverage as well and must be indicated on the certificate.

c. Commercial General Liability insurance shall be written on coverage forms at least as broad as ISO occurrence form CG 00 01, including but not limited to liability arising from premises, operations, stop gap liability, independent contractors, products-completed operations, personal and advertising injury, and liability assumed under an insured contract. There shall be no exclusion for liability arising from explosion, collapse or underground property damage. The Commercial General Liability insurance shall be endorsed to provide a per project general aggregate limit, using ISO form CG 25 03 05 09 or an equivalent endorsement.

d. The City of Vancouver shall be listed on the Certificate as Certificate Holder.

e. Cover Trigger: The insurance must be written on an "occurrence" basis. This must be indicated on the Certificate.

f. Contractor shall ensure that each subcontractor of every tier obtains and maintains at a minimum the insurance coverages required for Commercial General Liability and Auto Liability. Upon request of the City, the Contractor shall provide evidence of such insurance.

g. The Contractor shall keep this insurance in force during the term of the Contract and for thirty (30) days after the Physical Completion date. The Contractor shall provide the City and all Additional Insured with written notice of any policy cancellation, within two business days of their receipt of such notice.

h. Failure on the part of the Contractor to maintain the insurance as required shall constitute a material breach of contract, upon which the City may, suspend work or terminate the contract.

i. All costs for insurance shall be incidental to and included in the unit or lump sum prices of the contract and no additional payment will be made.

8. **CONTRACTOR'S BOND**: The Contractor agrees that before it undertakes performance of this Contract, it will file with the City a Performance Bond and a Payment Bond, in the forms prescribed by the City of Vancouver, in the full amount of the Contract price with a company authorized to do business in the State of Washington as a surety. The bonds shall comply with the laws of the State of Washington, especially with the provisions of Chapter 39.08 RCW.

9. **DISPUTE RESOLUTION**: In the event of a dispute between the Parties which cannot be resolved by the contract managers, the Contractor and the City shall review such dispute and may attempt to resolve the dispute. Any controversy or claim arising out of or relating to this Contract or alleged breach of this Contract that cannot be resolved by the Parties within 30 days of receipt of written notice may be submitted to mediation. If the dispute cannot be resolved through mediation, either party may initiate litigation pursuant to the governing law and venue provisions of this Contract. The Parties agree to pay their own attorneys' fees and expenses.

10. **GOVERNING LAW/VENUE**: This Contract shall be deemed to have been executed and delivered within the State of Washington, and the rights and obligations of the parties hereunder shall be construed and enforced in accordance with, and governed by, the laws of the State of Washington without regard to the principles of conflict of laws. Any action or suit brought in connection with this Contract shall be brought in the Superior Court of Clark County, Washington.

11. **EMPLOYMENT OF LABOR**: The Contractor agrees that all persons employed by the Contractor and by any of its subcontractor and any of their lower tier contractors in work performed pursuant to this Contract shall not be employed in excess of eight (8) hours in any day, except as provided or allowed by Chapter 49.28 RCW and WAC 296.127 and any amendment thereto.

12. **PAYMENT OF LABOR**: The Contractor agrees that all laborers, workers, or mechanics employed by it or by any subcontractor in the performance of this Contract will be paid not less than the prevailing wage rate for an hour's work, in accordance with the provisions of Chapter 39.12 RCW, and all rules and regulations promulgated pursuant thereto.

    The prevailing wage rates in effect at the time of the bid submittal deadline shall apply for the duration of the project, no matter how long it lasts. However, if the Contract is awarded more than six (6) months after the bids were due, the prevailing wage rates in effect on the award date shall apply.

    In case any dispute arises as to what the prevailing rate of wages for work of a similar nature are and such dispute cannot be adjusted by the parties involved, the matter shall

be referred to the director of the Department of Labor and Industries of the State of Washington for arbitration, and the director's decision shall be final, conclusive and binding on all parties involved in the dispute.

13. **PAYMENT TO THE CONTRACTOR**: Progress payments to the Contractor shall be made within 30 days of a fully executed Pay Estimate pending all compliance with all contractual requirements. A sum equal to 5% may be reserved and retained from monies earned by the Contractor in accordance with Chapter 60.28 RCW. The City reserves the right to require Contractor to correct any submitted or paid erroneous invoices according to the rates set forth herein. City and Contractor agree that any amount paid in error by City does not constitute a change in the agreed upon amount; Contractor agrees to issue a refund of any of any overages paid in error by the City.

    Release of the retained percentage or the retainage bond shall be in accordance with Chapter 60.28 RCW. Every person performing labor or furnishing supplies toward the completion of said improvement of work shall have a lien upon said monies so reserved; provided, that such notice of the lien of such claimant shall be given in the manner provided in RCW 39.08.030 and within the time provided in Chapter 60.28 RCW as now existing and in accordance with any amendments that may hereafter be made thereto.

    No payment shall be made to the Contract, however, until the Contractor and all subcontractors who have performed work shall have filed and received approval of a Statement of Intent to Pay Prevailing Wage as required by RCW 39.12.040 from the Washington State Department of Labor and Industries. Said Contractor and all subcontractors shall also keep accurate payroll records for three years from the date of acceptance as described in RCW 39.12.120. A Contractor and all subcontractors shall, file a copy of its certified payroll records using the Department of Labor and Industries online system on a monthly basis. A Contractor's noncompliance with this section shall constitute a violation of RCW 39.12.050.

14. **INDEMNIFICATION**: Contractor agrees to indemnify, defend, save and hold harmless the City, its officials, employees and agents from any and all liability, including but not limited to demands, claims, causes of action, suits or judgements, claims of copyright or patent infringement, including costs, attorney fees and expenses incurred in connection therewith, or whatsoever kind or nature, arising out of, or in connection with, or incident to, the performance of services by Contractor pursuant to this Contract.

    In the event that any suit based on such a claim, demand, loss, damage, cost or cause of action is brought against the Contractor, the City retains the right to participate in said suit.

    This indemnity and hold harmless shall include any claim made against the City by an employee of the Contractor or subcontractor or agent of the Contractor, even if Contractor is thus otherwise immune from liability pursuant to worker's compensation statute, Title 51 RCW. To the extent that such liability arises from the concurrent negligence of both the City and the Contractor, such cost, fees and expenses shall be shared between the City and the Contractor in proportion to their relative degrees of negligence. This indemnity and hold harmless shall NOT apply in the case where liability arises from the sole negligence of the City. The Contractor specifically acknowledges that the provisions

contained herein have been mutually negotiated by the Parties and it is the intent of the Parties that Contractor provide the broadest scope of indemnity permitted by RCW 4.24.115.

15. **OWNERSHIP OF RECORDS AND DOCUMENTS**: Any and all work product prepared by the Contractor in the course of performing this Contract shall immediately become the property of the City. In consideration of the compensation provided for by this Contract, the Contractor hereby further assigns all copyright interests in such work product to the City. A copy may be retained by the Contractor. Previously owned intellectual property of Contractor or any third party, and any know-how, methodologies or processes used by Contractor to provide the services or project deliverables under this Contract shall remain property of the original City.

16. **PUBLIC DISCLOSURE COMPLIANCE**: The parties acknowledge that the City is an "agency" within the meaning of the Washington Public Records Act, Chapter 42.56 RCW, and that materials submitted by the Contractor to the City become public record. Such records may be subject to public disclosure, in whole or part and may be required to be released by the City in the event of a request for disclosure. In the event the City receives a public record request for any data or deliverable that is provided to the City and that is licensed from the Contractor, the City shall notify the Contractor of such request and withhold disclosure of such information for not less than five business days, to permit the Contractor to seek judicial protection of such information, provided that the Contractor shall be responsible for attorney fees and costs in such action and shall save and hold harmless the City from any costs, attorney fees or penalty assessment under Chapter 42.56 RCW for withholding or delaying public disclosure of such information.

17. **COOPERATIVE PURCHASING**: The Washington State interlocal Cooperation Act, Chapter 39.34 RCW, authorizes public agencies to cooperatively purchase goods and services if all parties agree. By having executed this Agreement, the Contractor agrees that other public agencies may purchase goods and services under this solicitation or contract at their own cost and without the City incurring any financial or legal liability for such purchases. The City agrees to allow other public agencies to purchase goods and services under this solicitation or contract, provided that the City is not held financially or legally liable for purchases and that any public agency purchasing under solicitation or contract file a copy of this invitation and such contract in accordance with RCW 39.34.040.

18. **AMENDMENTS**: All changes to this Contract, including changes to the statement of work and compensation, must be made by written Change Order and/or Amendment and signed by all parties to this Contract.

19. **AUTHORIZATION AND COMPLIANCE WITH THE LAW**: The Contractor certifies that the person signing the Contract is legally authorized to enter into this binding Contract and that the Contractor shall fully comply with all relevant, federal, state and municipal laws, rules, regulations and policies.

20. **CITY BUSINESS AND OCCUPATION LICENSE**: The Contractor will be required to obtain a business license when contracting with the City unless allowable exemptions apply. The Contractor shall contact the State of Washington Business License Service website or by

phone at 800-451-7985, or the City's website to determine whether a business license is required pursuant to the Vancouver Municipal Code (VMC) Chapter 5.04.

21. **RELATION OF PARTIES**: The Contractor, its subcontractors, agents and employees are independent contractors performing services for the City and are not employees of the City; shall not as a result of this Contract, accrue leave, retirement, insurance, bonding or any other benefits afforded to City employees; and, shall not have the authority to bind the City in any way except as may be specifically provided in the Statement of Work.

22. **ASSIGNMENT**: This Contract is binding on each party, its successors, assigns, and legal representatives and may not, under any circumstances, be assigned or transferred by either party without the other party's express written authorization.

23. **TERMINATION FOR CONVENIENCE**: The City, at its sole discretion, may terminate this Contract for convenience at any time for any reason deemed appropriate. Termination is effective immediately upon notice of termination given by the City.

    In the event this Contract is terminated prior to the completion of Work, Contractor will only be paid for the Work completed at the time of termination of the Contract.

24. **TERMINATION FOR CAUSE**: In the event the Contractor is, or has been, in violation of the terms of this Contract, including the solicitation, the City reserves the right, upon written notice to the Contractor, to cancel, terminate or suspend this Contract in whole or in part for default. Termination shall be effected by serving a notice of termination on the Contractor setting forth the manner in which the Contractor is in default. The Contractor will be paid only the contract price for services performed in accordance with the manner of performance set forth in the Contract.

    If it is later determined by the City that the Contractor had an excusable reason for not performing, such as a strike, fire or flood, or events which are not the fault of or are beyond the control of the Contractor, the City after setting up a new delivery or performance schedule, may allow the Contractor to continue work or treat the termination as a termination for convenience.

25. **OPPORTUNITY TO CURE**: The City at its sole discretion may in lieu of a termination allow the Contractor to cure the defect(s), by providing a "Notice to Cure" to Contractor setting forth the remedies sought by the City and the deadline to accomplish the remedies. If the Contractor fails to remedy to the City's satisfaction the breach or default of any of the terms, covenants, or conditions of this Contract within the time stated time, the City shall have the right to terminate the Contract without any further obligation to the Contractor. Any such termination for default shall not in any way operate to preclude the city from also pursuing all available remedies against the Contractor and its sureties for said breach or default, including but not limited to, termination of this Contract for convenience.

26. **WAIVER AND REMEDIES**: City's failure to enforce the terms or conditions herein or to exercise any right or privilege, or the City's waiver of any breach hereunder shall not thereafter waive any other term, condition or privilege, whether of the same or similar

type. Remedies under this Contract are cumulative; the use of one remedy shall not be taken to exclude or waive the right to use another.

27. **ENTIRETY OF CONTRACT:** This Contract incorporates all the agreements, covenants and understanding between the parties hereto and are merged into this written Contract. No prior agreement or prior understanding, verbal or otherwise, of the parties or their agents shall be valid or enforceable unless set forth in this Contract.

28. **USE OF CITY'S NAME:** Contractor may not use any of City's name, trademark, service marks, or logo in connection with the services contemplated by this Contract or otherwise without the prior written permission of City, which permission may be withheld for any or no reason and may be subject to certain conditions.

29. **DEBARMENT:** The Contractor certifies that that it is not presently debarred, suspended, proposed for debarment, and declared ineligible or voluntarily excluded from covered transactions by any Federal, State or local department or agency.

30. **NON-DISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY**: During the term of this Contract, Contractor will not discriminate against any employee or applicant for employment in accordance with RCW Chapter 49.60, including, but not limited to creed, religion, race, color, age, sex, marital status, sexual orientation, sexual identity, pregnancy, military status, political ideology, ancestry, national origin, or the presence of any sensory, mental or physical disability, unless based upon a bona fide occupational qualification. The Contractor will take affirmative action to ensure that applicants and employees are treated fairly, without regard to their creed, religion, race, color, sex, national origin, or the presence of any sensory, mental or physical disability. Such action shall include all terms and conditions of employment, compensation and benefits, including apprenticeship.

31. **BINDING EFFECT:** The provisions, covenants and conditions in this Contract bind the parties, their legal heirs, representatives, successors and assigns.

32. **RATIFICATION:** Acts taken pursuant to this Contract but prior to its effective date are hereby ratified and confirmed.

33. **CONTRACT DOCUMENTS AND ORDER OF PRECEDENCE:** The complete Contract includes these parts, all of which are incorporated herein by reference, and any inconsistency in the parts of the contract shall be resolved by following this order of precedence (e.g., 1 presiding over 2, 2 over 3, 3 over 4, and so forth):

    1. Amendments to the Contract,
    2. This Contract,
    3. Contractor's Bid including all Addenda to the Solicitation,
    4. Special Provisions,
    5. Contract Plan Set,
    6. City of Vancouver Amendments to the specified WSDOT Standard Specifications,
    7. City of Vancouver Standard Plans,
    8. WSDOT Standard Specifications,

9. WSDOT Standard Plans.

On the Contract Plans, Working Drawings and Standard Plans, figured dimensions shall take precedence over scaled dimensions.

Whenever reference is made in these Specifications or the Special Provisions to codes, rules, specifications and standards, the reference shall be construed to mean the code, rule, specification or standard that is in effect on the Invitation to Bid advertisement date, unless otherwise stated or as required by law.

If any part of the Contract requires Work that does not include a description for how the Work is to be performed, the Work shall be performed in accordance with standard trade practice(s). For purposes of the Contract, a standard trade practice is one having such regularity of observance in the trade as to justify an expectation that it will be observed by the Contractor in doing the Work.

34. NOTICES: All notices which are given or required to be given pursuant to this Contract shall be hand delivered, mailed postage paid or sent by electronic mail as follows:

For the City:
Anna Vogel
City of Vancouver
415 W 6th Street
P O Box 1995
Vancouver WA 98668-1995
anna.vogel@cityofvancouver.us

For the Contractor:
Paul Harding
Granite Construction Company
16821 SE McGillvray Blvd. Ste. 210B
Vancouver, WA 98683
bid.vancouver@gcinc.com

The undersigned, as the authorized representatives of the City and Contractor respectively, agree to all of the terms and conditions contained in this Contract, as of the dates set forth below.

CITY OF VANCOUVER
A municipal corporation

Lon Pluckhahn, City Manager

Date

Attest:

Lisa Brandl, City Clerk

CONTRACTOR:
Granite Construction Company

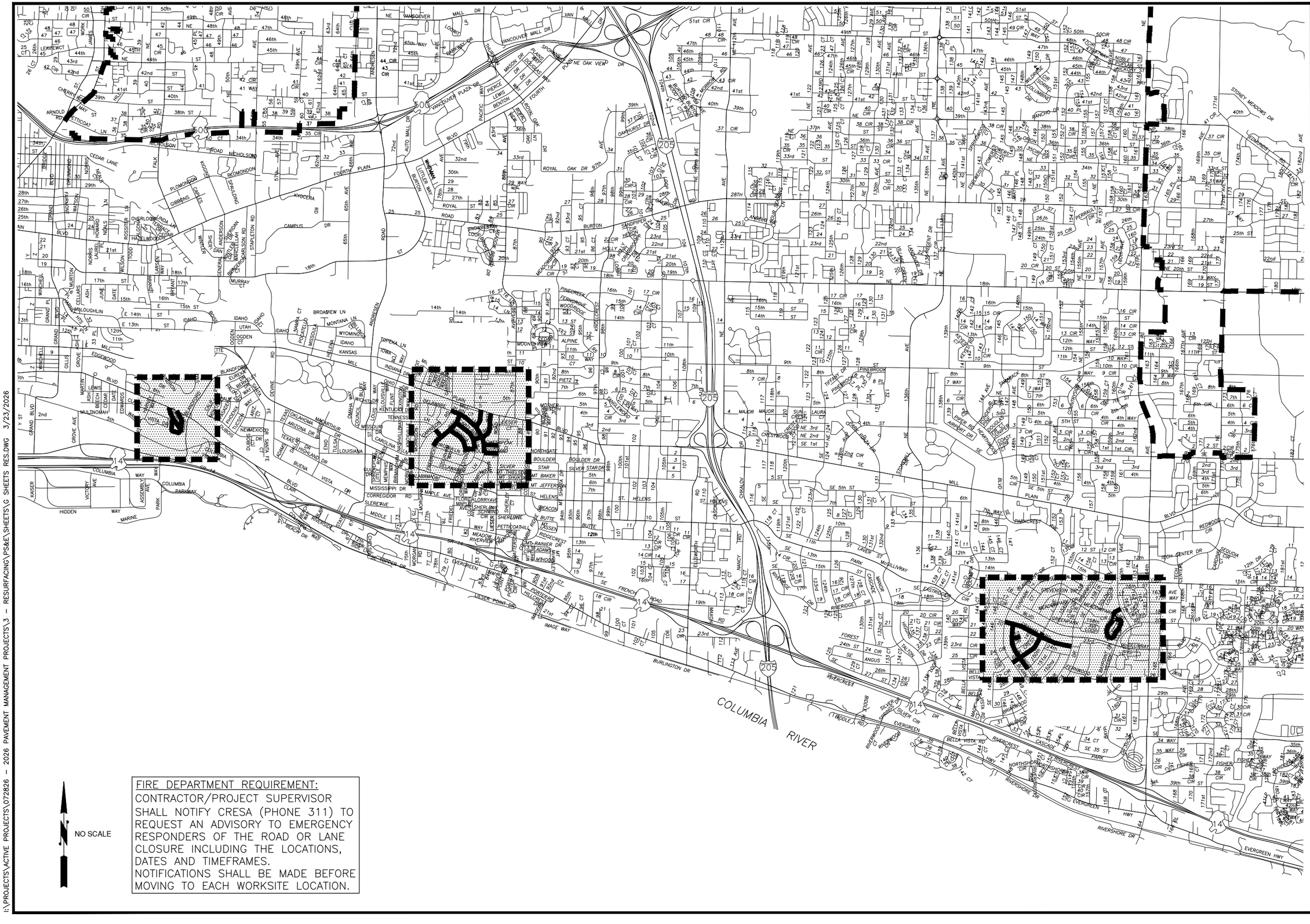
Signature

Printed Name /Title

Date

Approved as to form:

Nena Cook, City Attorney



FIRE DEPARTMENT REQUIREMENT:
CONTRACTOR/PROJECT SUPERVISOR SHALL NOTIFY CRESA (PHONE 311) TO REQUEST AN ADVISORY TO EMERGENCY RESPONDERS OF THE ROAD OR LANE CLOSURE INCLUDING THE LOCATIONS, DATES AND TIMEFRAMES.
NOTIFICATIONS SHALL BE MADE BEFORE MOVING TO EACH WORKSITE LOCATION.

I:\PROJECTS\ACTIVE PROJECTS\072826 - 2026 PAVEMENT MANAGEMENT PROJECTS\3 - RESURFACING\PS&E\SHEETS\G SHEETS RES.DWG 3/23/2026

Know what's below. Call before you dig.

FILE NAME: G SHEETS.DWG
SCALE:
HORIZONTAL: NO SCALE
VERTICAL:
DATE No.
DATE: MARCH 2026
DESIGNED BY: OS
DRAWN BY: OS
CHECKED BY: CS
APPROVED BY: RM
REVISIONS

VICINITY MAP

City of Vancouver Public Works

PRJ072826

Staff Report: 107-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject

Service Agreement - NE 18th Street - NE 138th Street to NE 162nd Street for Design Services- C-102271

Key Points

- In 2006, the City completed an Environmental Assessment (EA) on NE 18th Street between NE 87th Avenue to NE 192nd Avenue and issued a Finding Of No Significant Impact (FONSI) on April 18, 2006.
- Since that time, the City has improved sections of NE 18th Street, mainly the between I-205 and NE 138th Avenue. The City has scheduled the section west of I-205 (between NE 97th Avenue and NE 107th Avenue) for construction in fall 2026.
- This professional agreement with HHPR, would provide final design engineering, traffic modeling and multi-model analysis, environmental process and permitting, public involvement process, and coordination with the Bonneville Power Administration (BPA) for the section of 18th Street between NE 138th Avenue and NE 162nd Avenue. This project would also include the continuation of the 18th Street multi-use pathway.
- The project is not currently funded for right-of-way or construction. However, a fully designed and permitted, shovel-ready project will be more attractive for grant opportunities.

Strategic Plan Alignment

Transportation and Mobility – a safe, future-ready and convenient transportation system

Economic Opportunity – a place where a wide variety of businesses of all sizes grow and thrive

Vibrant and Distinct Neighborhoods – a variety of accessible places and spaces

Present Situation

A Request for Qualifications (RFQ 12-25) for the NE 18th Street Improvement Project was issued on March 7, 2025. The scope of work identified the necessary traffic and design engineering, environmental process, public involvement process and other related professional services to be performed. In addition to its standard RFQ notification process, the City notified and requested qualification statements from firms on the MRSC consultant list including veteran-, minority-, and women-owned firms. On April 11, 2025, the City received four statements of qualifications for the NE 18th Street project (RFQ 18-25). The submitted materials were evaluated based on experience, project understanding and approach, public process, and interviews. Harper Houf Peterson Righellis Inc. of Vancouver, Washington was selected from the four proposals. The amount of the contract shall not exceed $2,817,466.52 and will be billed on a time and material basis in accordance with the attached scope and fee schedule. This is project TRANS-0444 in the City's Six Year Transportation Improvement Program.

Advantage(s)

1. Provides a construction-ready project, including design, permitting, specifications and construction cost estimates.
2. Creates an opportunity for the public to provide significant input into the project.
3. Consistent with the City's long-range planning and economic development goals.

Challenge(s)

Requires local funding which was approved as part of the spring Supplemental Budget.

Budget Impact

The project is funded through the Transportation Capital Fund.

Prior Council Review

1. Approval of the 2026-2031 Transportation Improvement Program on June 16, 2025, Resolution number M-4341, including NE 18th Street (NE 138th Avenue to 162nd Avenue) TRANS-0444 Project.
2. Approval of the 2025-2026 biennial budget on December 2, 2024, which contained the project, NE 18th Street. The spring supplemental budget, approved on April 6, 2026, also includes additional funding for this project.

Action Requested

On Monday, June 1, 2026, authorize the City Manager, or designee, to finalize and execute a professional services agreement with Harper Houf Peterson Righellis Inc. for a contract amount of $2,817,466.52.

Staff Contact

Leslie Degenhart, Civil Engineer 3, Hassan Abdalla, Engineering Manager, Leslie.Degenhart@cityofvancouver.us, hassan.abdalla@cityofvancouver.us

Attachments:

1. Contract
2. Fee Schedule
3. Vicinity Map

CITY OF VANCOUVER
SERVICES AGREEMENT
No. C-102271
RFQ 12-25 NE 18TH STREET – NE 138TH AVE TO 162ND AVE

This Services Agreement ("Agreement"), effective on the date last signed below (the "Effective Date") is entered by the City of Vancouver, Washington, a municipal corporation organized under the laws of the State of Washington ("City") and Harper Houf Peterson Righellis, Inc a Foreign Profit Corporation organized under the laws of the State of Oregon ("Contractor"). The City and Contractor are collectively referred to as the "Parties" or individually as a "Party".

RECITALS

A. The City desires to engage the Contractor to perform Services as described in this Agreement; and
B. The City advertised and issued a request for qualifications, numbered 12-25 ("Solicitation") and after evaluation of the Contractor's responsive proposal, found the Contractor capable of performing the required Services.

AGREEMENT

In consideration of the terms and conditions in this Agreement, the Parties agree as follows:

1. **SCOPE OF SERVICES:** The Contractor agrees to provide the City with all services and materials provided in the Scope of Services, attached as Exhibit A, and in the City's Solicitation, if any, and the Contractor's responsive proposal to the City's Solicitation, if any (the "Services"). Contractor shall obtain City Project Manager's written approval prior to starting the Services.

2. **COMPENSATION: Payment** to the Contractor for the Services described in this Agreement shall not exceed $ 2,817,466.52 USD.

This payment shall be the maximum compensation for all Services including labor, materials, supplies, equipment, and incidentals necessary to complete the Services. And it shall not be exceeded without the City's prior written authorization in the form of a negotiated and executed amendment. Contractor agrees this compensation is adequate and sufficient for the timely provision of all Services under this Agreement.

City will limit compensation to the amount specified for each specific task and/or sub-task, unless amended in writing. Contractor shall complete the Services stated within the number of hours identified for each task, and/or sub-task, or for the lump sum amount associated with a task. If compensation is made on an hourly basis and the Services requires fewer hours than those estimated, the Contractor will be paid for the actual worked hours necessary to complete that task and/or sub-task. If Contractor underestimated the number of hours required to perform the Services, Contractor shall be paid up to the maximum number of hours stated for the task and/or sub-task. Compensation may be amended, at the City's sole discretion, for documentable circumstances not reasonably foreseeable to either party at the time the task and/or subtask is initiated, or for changes to the scope of services requested by City. All Deliverables (as defined in Section 6) must be acceptable to City in its sole discretion.

City will reimburse Contractor for the following travel expenses identified in its proposal upon submission of receipts to City: airfare, mileage at the approved IRS rate and lodging at the U.S. General Services Administration rates. For the avoidance of doubt, City will not reimburse Contractor wages incurred during travel time.

3. **PAYMENT FOR CONTRACTOR SERVICES**: The Contractor shall submit monthly invoices to City covering both professional fees and project expenses, if any, from the previous month. Invoices must be submitted to the Project Manager, Leslie Degenhart, by email to leslie.degenhart@cityofvancouver.us and accpay@cityofvancouver.us or by mail to City of Vancouver, Leslie Degenhart, PO Box 1995, Vancouver, WA 98668.

   City shall pay Contractor within 30 days of receipt of Contractor's invoice. The City will pay Contractor pursuant to Exhibit "B." The City may correct any invoice overpaid in error.

   The Parties agree that any amount paid in error by City does not alter the fee schedule. City's contract/purchase order (PO) number on the notice to proceed must be referenced on any invoice submitted for payment.

4. **TERM OF AGREEMENT**: The term of this Agreement begins on June 15, 2026 and continues until June 14, 2031. The term and any renewal term are collectively the "Term."

5. **CITY DATA; DATA SECURITY**

5.1 City Data. Contractor may obtain and process City Data in connection with the Services. "City Data" means the data City provides to Contractor in connection with the receipt of the Services and any data generated by Contractor in connection with providing the Services to City. City owns all City Data. City licenses City Data to Contractor solely for the purposes of providing the Services to City or improving the Services for City. Contractor shall not use City Data for any other purpose, including as artificial intelligence training data. Contractor acknowledges that compliance with Applicable Laws under Section 17 of the Agreement includes compliance with all applicable federal, state, and local data protection laws in its provision of the Services.

5.2 Data Security. If Contractor maintains City Data on Contractor systems it will comply with the following data security requirements.

5.2.1 Security Practices. Contractor shall develop, implement, and maintain appropriate administrative, physical, and technical safeguards that are designed to ensure the confidentiality, integrity and availability of City Data. Contractor will enact safeguards that are compliant with industry best practices for the specific City Data obtained by Contractor in connection with the Services.

5.2.2 Location of City Data. Contractor shall maintain City Data solely in data centers located in the United States.

5.2.3 Security Breaches. A "Security Breach" is any suspected or actual unauthorized access to or use of City Data in Contractor's possession.

a. Notice. Contractor will notify City within 24 hours of any Security Breach. Notice will include details regarding the Security Breach including impacted parties, specific data, and mitigation. Contractor will call 360.487.8888 (if after hours, follow prompt to connect to on-call personnel); email City with a read receipt to help.desk@cityofvancouver.us; and email to the City personnel contact for the Agreement.
b. Coordination. Immediately after Contractor provides notification of a Security Breach the Parties will begin working together to contain, mitigate, investigate, respond to and remediate the Security Breach. Contractor will

cooperate with all City requests in relation to the Security Breach in compliance with Applicable Law.

c. Root Cause Analysis. As soon as possible following the Security Breach, Contractor will complete a root cause analysis and will provide a plan to City for remediation and prevention.
d. Third-Party Notice. Contractor will work together with City to ensure compliance with RCW 19.255.010 if necessary and will make no statement or send notice to any third party regarding the Security Breach without City's prior written consent.
e. Costs. In addition to its indemnification obligations, Contractor will reimburse City for all costs City incurs associated with any Security Breach, including forensic investigation, costs of providing notice to impacted parties, call centers and credit monitoring as applicable. Contractor will pay or reimburse City for all regulatory fines and other legal costs the City incurs associated with the Security Breach.

6. **DELIVERABLES - INTELLECTUAL PROPERTY** Contractor may create documents or other work product in connection with providing the Services ("Deliverables"). Contractor assigns and will assign to City all right, title, and interest in and to any Deliverables it creates in connection with providing the Services. Contractor may retain a copy of any Deliverable for its internal business purposes. Contractor's know-how, methodologies and processes are Contractor intellectual property. Contractor grants City a perpetual, irrevocable, royalty-free, worldwide license to use all Contractor intellectual property in connection with the Deliverables for any City purpose.

7. **AUDIT RIGHTS:** Contractor shall maintain records of all matters related to this Agreement in accordance with generally accepted accounting principles. Contractor shall provide the records to City or any other governmental agency with jurisdiction for audit, at such reasonable times and places as City designates.

8. **PUBLIC DISCLOSURE COMPLIANCE:** Records relating to Agreement are subject to the following:

8.1 Confidential Information. Any record of City business, including this Agreement, related records, and City Data, is a public record under the Washington Public Records Act, codified at chapter 42.56 RCW ("PRA"). City may be required to disclose this Agreement or related records, including records in Contractor's possession, pursuant to a public disclosure request. City will provide third-party notice to Contractor before disclosing records. Public records may be subject to exemptions from disclosure under the PRA. City agrees to withhold its release of the requested

records in dispute for a reasonable amount of time (approximately 10 days) to allow Contractor an opportunity to seek judicial protection pursuant to RCW 42.56.540 as adopted or amended.

8.2 Public Disclosure Compliance. City will comply with the PRA in its receipt of and response to any public disclosure request for responsive records related to this Agreement, subject to applicable exemptions. Under RCW 42.56.060, City will have no liability to Contractor for disclosure of Contractor information acting in good faith pursuant to its obligations under the PRA.

8.3 Subpoenas. If either Party receives a subpoena requiring the disclosure of the other Party's information, that Party will notify the other party and provide a reasonable time for the affected party to obtain a protective order prior to disclosing information. If a Party is prohibited by a court with jurisdiction over the matter from disclosing the subpoena, that Party will provide only the specific information required to be released under the subpoena on the advice of counsel.

8.4 City Data Confidentiality. Notwithstanding Section 8.1-3, Contractor will maintain the confidentiality of all City Data in its possession in conformance with Section 8.

9. STANDARD OF CARE: Contractor shall exercise the degree of skill and diligence normally employed by consultants in the same industry, performing the same or similar services. Contractor will re-perform any Services that breach this provision at no cost to City.

10. DISPUTE RESOLUTION: City and Contractor agree to negotiate in good faith for a period of 30 days from the date of notice of all disputes between them prior to exercising their rights under this Agreement or under law. All disputes between City and Contractor not resolved by negotiation between the Parties may be mediated only by mutual agreement of both Parties. If not mutually agreed to resolve the claim by mediation, the claim will be resolved by legal action. The Parties agree that if litigation is necessary to enforce any of the provisions of this Agreement, each party shall pay all of their own attorney fees and costs related to the litigation.

11. TERMINATION FOR CONVENIENCE: City may terminate this Agreement at any time for convenience. City will pay Contractor for all Services completed up to the date of termination for convenience. A decision by City to terminate for convenience does not waive any legal rights City has to enforce the Agreement.

12. TERMINATION FOR MATERIAL BREACH: If Contractor materially breaches by failing to perform any of the obligations of the Agreement, including violating any law,

regulation, rule, or ordinance applicable to this Agreement, or becomes insolvent or declares bankruptcy, or makes an assignment for the benefit of creditors, Contractor shall not be entitled to receive any further payments under the Agreement until the Services are completed to City's satisfaction. City may provide Contractor a cure period in its sole discretion or may terminate the Agreement and, at City's option, obtain performance of the Services elsewhere.

13. **INDEMNIFICATION:** Contractor shall indemnify, defend, and hold harmless City and its officers, councilmembers, commissioners, employees, volunteers, and agents, from any claim, liability, loss, cost, expense, suit, and damages, including attorney's fees and consulting fees relating to (a) a third party claim for intellectual property infringement relating to the Contractor's Services or the Deliverables; (b) Contractor's negligence or willful misconduct; (c) Contractor's material breach of the Agreement; (d) Contractor's non-compliance with applicable law; (e) a third-party Washington Public Records Act claim involving Contractor information; and (f) Contractor's court action to enjoin release of Contractor information under the Washington Public Records Act.

    City will promptly notify Contractor of a claim under this Section 13 and will provide reasonable cooperation to Contractor in the defense of the claim. Contractor will have control over defense and settlement of the claim, except that Contractor will not enter any settlement or related agreement without City's prior written consent. Notwithstanding the preceding sentence, City may participate in the defense or settlement of any claim with counsel of its own choosing.

    Solely for negligence indemnification claims under (b) above, if Contractor is providing architectural, landscape architectural, engineering, or land surveying services as the Services under this Agreement, and Contractor and City are concurrently negligent, then Contractor will be required to indemnify City only to the extent of Contractor's negligence and will have no obligation to indemnify City for City's sole negligence, pursuant to RCW 4.24.115.

    If Contractor or Contractor's employee is a licensed architect, professional engineer, land surveyor, or landscape architect and the Services are related to a construction project, Contractor expressly waives its industrial insurance immunity under the Washington Industrial Insurance Act Title 51 RCW. Contractor acknowledges this waiver has been mutually negotiated and the Parties desire to incorporate this waiver pursuant to RCW 4.24.115(1)(b).

14. INSURANCE: Contractor shall maintain liability insurance for all claims for damages to the City, persons or property that arise from Contractor's performance during the Term of this Agreement.

Contractor shall maintain the following insurance coverage.

COVERAGE	LIMITS OF LIABILITY
I. Commercial General Liability:	
Policy shall include Bodily Injury, Property Damage, Personal Injury and Broad Form Contractual Liability	
Each Occurrence	$1,000,000
General Aggregate Per Occurrence	$2,000,000
Products & Completed Operations Aggregate	$2,000,000
Personal and Advertising Injury	$1,000,000
Blanket Contractual Liability	$1,000,000
II. Commercial Automobile Liability	
Policy shall include Bodily Injury and Property Damage for any owned, hired, and/or non-owned vehicles arising from the performance of this Agreement.	
Combined Single Limit	$1,000,000
III. Workers' Compensation (applicable to the State of Washington)	
Per Occurrence	
Employer's Liability	$1,000,000
Disease Each Employee	$1,000,000
Disease Policy Limit	$1,000,000
Each Claim	$1,000,000
Annual Aggregate	$1,000,000
V. Professional Liability	
Policy shall include coverage for all claims for damages to person or property arising from the performance of this Agreement.	$2,000,000

In addition to the coverage and limits listed above the Contractor's insurance must all contain the following:

a. Compliance with other Insurance Policies - Contractor will remain compliant with all other insurance obligations it may have pursuant to its personnel or applicable law.

b. Coverage Trigger - Contractor's insurance must be on an "occurrence" basis rather than claims made. This type of coverage must be indicated on the Certificate of Insurance.

c. Additional Insured Requirement - The City of Vancouver, its Agents, Representatives, Officers, Directors, Elected and Appointed Officials, and Employees must be named as additional insureds where permissible under applicable law. The required Additional Insured endorsements shall be at least as broad as ISO CG 20 10 11 85, or its equivalent CG 20 10 07 04 and CG 20 37 07 04 must be included with the Certificate of Insurance.

d. Certificates - The City of Vancouver shall be listed on the Certificate of Insurance as the Certificate Holder. Contractor will provide the Certificate of Insurance to City upon request on an ACORD or comparable form.

All policies shall be issued by an insurance company authorized to do business as an insurance company in the State of Washington.

15. **RELATIONSHIP OF THE PARTIES**. The relationship of the Parties under this Agreement is that of independent contractors. Contractor is solely responsible for the manner, method, and means of providing the Services. Contractor and its employees are not City employees and will not be entitled to or receive any benefits under this Agreement. Contractor will pay all Contractor personnel and pay all taxes, contributions, and benefits that may be required related to its personnel. Neither Party may bind the other except as expressly stated in this Agreement.

16. **SUBCONTRACTING***:* Contractor may subcontract for Services with City's prior written approval in its sole discretion. Contractor is solely responsible for its subcontractors' compliance with this Agreement and will pass through the terms of this Agreement to all subcontractors.

17. **COMPLIANCE WITH APPLICABLE LAW:** Contractor shall comply with all applicable federal, state, and local laws, rules, and regulations ("Applicable Laws"). Contractor shall modify the Services as necessary to comply with Applicable Laws.

18. **E-VERIFY:** Contractor shall enter into and register a Memorandum of Understanding with the Department of Homeland Security E-Verify program within 60 days of executing this Agreement. Contractor shall ensure all Contractor employees and any subcontractors assigned to perform Services under this Agreement are eligible to work in the United States. Contractor shall provide compliance verification upon City's request.

19. **TITLE VI COMPLIANCE**: Depending on the Services Contractor provides, the City may use federal funds to compensate Contractor. If federal funds are used. the City, Contractor, and any approved subcontractor must comply with the provisions of Title VI of the Civil Rights Act of 1964, (78 Stat. 252, 42 U.S.C. 2000d to 2000d-4) (CRA) and the Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28 (1988) (CRRA). Contractor must confirm with City whether Title VI is applicable under this Agreement.

20. **EQUAL EMPLOYMENT OPPORTUNITY**: The City is an equal opportunity employer. Contractor shall not discriminate against any of its employees or applicants for employment on the basis of race, color, creed, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, citizenship or immigration status, age (40 or older), the presence of any sensory, mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability, genetic information, honorably discharged veteran or military status, or any other class protected by federal, state, or local employment discrimination laws.

21. **ANTI-KICKBACK**. City officers and employees shall not have or acquire an interest in the Agreement or solicit, accept, or give any item of value from a person or entity with an interest in this Agreement.

22. **PERMITS, LICENSES, AND CERTIFICATIONS**. Contractor is solely responsible for any license, permit or certificate that may be required by any federal, state or local law in connection with the performance of Contractor's obligations under this Agreement, including any business license. Contractor may contact the State of Washington Business License Service (BLS) at: 800-451-7985, www.bls.dor.wa.gov/cities/vancouver.aspx or visit the City's website found at www.cityofvancouver.us/businesslicense for assistance with the determination.

23. **COOPERATIVE PURCHASING:** The Washington State Interlocal Cooperation Act, chapter 39.34 RCW, authorizes public agencies to cooperatively purchase goods and services if all parties agree. By executing this Agreement, Contractor agrees that other public agencies may purchase goods and services under this Agreement at their own cost. City will have no liability or obligation related to Contractor related to that separate agency agreement. Therefore, City agrees to allow other public agencies to purchase services under this Agreement so long as City is not held financially or legally liable for any separate agency services received pursuant to

the Agreement, and that any public agency purchasing under this Agreement file a copy of it in accordance with RCW 39.34.040.

24. **DEBARMENT**: Contractor certifies that it is not presently debarred, suspended, proposed for debarment, and declared ineligible or voluntarily excluded from covered transactions by any federal, state or local department or agency.

25. **NOTICES:** All notices will be hand delivered, certified mail, or sent by electronic mail if agreed by the Parties. Notice will be effective when received if hand delivered, on the delivery date if certified mail, or when an email is sent. Notice must be addressed to the Parties at:

For the City:	For the Contractor:
Anna Vogel	Bruce Haunreiter, PE
City of Vancouver	Harper Houf Peterson Righellis, Inc.
415 W 6th Street	1220 Main Street, Suite 150
P O Box 1995	Vancouver WA 98660
Vancouver WA 98668-1995	Email: bruce@hhpr.com
Email: anna.vogel@cityofvancouver.us	

Either Party may update its address for notice by giving written notice to the other Party.

26. **ASSIGNMENT.** Contractor shall not assign this Agreement without the express written consent of City. Any assignment in violation of this subsection is void. All terms of this Agreement are binding on any assignee.

27. **ORDER OF PRECEDENCE:** If there is a conflict between the terms of any document, the order of precedence is as follows: Amendments to this Agreement; this Agreement; Contractor's responsive proposal to City's solicitation; and City's solicitation. The Parties agree that terms included on any Purchase Order or other document provided by Contractor are not part of this Agreement.

28. **SURVIVAL**. Sections 15 - 35 will survive any termination of this Agreement.

29. **WAIVER**. A Party's waiver of any term of this Agreement must be in writing and signed by the Party waiving compliance.

30. **THIRD PARTY BENEFICIARIES**. There are no third-party beneficiaries under this Agreement.

31. **GOVERNING LAW**: This Agreement is governed by the laws of the State of Washington without regard to its conflicts of laws provisions. Venue for any action arising under this Agreement will be the state or federal courts for Clark County, Washington. The Parties waive any claim of inconvenient forum.

32. **SEVERABILITY**. If a court with jurisdiction over the matter determines any clause of this Agreement is unenforceable, it shall revise the clause to reflect the intent of the Parties as closely as possible. If revision is not possible, the Court shall strike the clause and the remainder of the Agreement will remain in full force and effect.

33. **AMENDMENTS:** Any amendments to this Agreement must be in writing and signed by all Parties to this Agreement.

34. **ENTIRE AGREEMENT**: This Agreement, together with any amendments, is the entire agreement between the Parties, and supersedes any other agreement or discussion between them, whether written or oral in nature.

35. **COUNTERPARTS**. This Agreement may be signed in counterparts. Each counterpart will be deemed an original and together the separate parts will form one Agreement.

City and Contractor enter the Agreement as of the Effective Date.

CITY OF VANCOUVER
A municipal corporation

Lon Pluckhahn, City Manager

Date

Attest:

Lisa Brandl, City Clerk

Approved as to form:

City Attorney's Office

CONTRACTOR:
Harper Houf Peterson Righellis, Inc.

Signature

Printed Name /Title

Date

EXHIBIT "A":
Scope of Work

The Contractor will perform design and traffic engineering, environmental processes, public involvement processes and other related professional services for the NE 18th Street Corridor Improvements – NE 138th Avenue to NE 162nd Avenue project.

Professional services will include evaluation of alignment options, traffic engineering including evaluation of roundabouts and traffic signal options, lighting design, landscape design, multimodal section, structural design, environmental process and permits, construction plans and specifications, surface water report, water/sanitary sewer/surface water designs and utility coordination. Additionally, project coordination and required federal documentation will be performed.

The project team includes:

- Harper Houf Peterson Righellis (HHPR) – Project management, survey, civil engineering, hydraulics and stormwater management, utility coordination, landscape design, structural design, environmental process and permits.
- Global Transportation Engineering (GTEng)– Traffic analysis and design, street lighting, signage and striping
- Columbia West (CWE) – Geotechnical exploration and hazardous materials assessment
- Archaeological Services (ASCC) – Cultural resources analysis
- Michael Minor & Associates (MMA) – Noise and air quality analysis
- Point North (PN) - Public outreach
- Morgan Holen & Associates (MHA) – Tree Evaluation

The NE 18th Street project is expected to have federal funding in the right of way and construction phases and is intended to improve safety and multimodal travel in the project area.

Federal permitting will be based on an Environmental Assessment (EA) from 2006, which may require an update to the National Environmental Policy Act (NEPA) Categorical Exclusion documentation. A City Critical Areas Ordinance and a State Environmental Policy Act (SEPA) checklist shall be prepared for the Project. Also the Consultant shall prepare the National Pollutant Discharge Elimination System (NPDES) application and Storm Water Pollution Prevention (SWPP) Plan for the Project.

PROJECT DESCRIPTION/BACKGROUND

Currently, the corridor is a two-lane paved road with minimal shoulders and turn pockets at intersections. The existing roadway has no center turn lanes, medians, bike lanes or continuous sidewalks. There are intermittent portions of the roadway with curb, gutter and sidewalk, but the improvements may not be in the proper location.
Other elements of this Project include evaluation of traffic signals vs. roundabouts for intersection control, multimodal lane configuration and alignment determination, right-of-way requirements, storm drainage, environmental evaluation, pedestrian facilities, utility and agency coordination, and public involvement.

An agency coordination process will be performed as part of the Consultant contract. The Project will include coordination with various stakeholders including Bonneville Power Administration, Evergreen Public School District, WSDOT, local neighborhood associations, commercial and residential properties and other agencies. This coordination will be essential to the success of this Project.

LANE CONFIGURATIONS

This project will widen NE 18th Street to urban arterial standards. Per the results of the traffic analysis, the ultimate lane configurations through the corridor may be a 3-lane or 5-lane section utilizing signalized intersections or roundabouts at key locations. Multimodal facilities meeting the City of Vancouvers Complete Street Standards may be located outside of the carriageway and designed as part of the larger Burnt Bridge Creek Trail system. A traffic study and a strong public engagement process will be utilized before deciding on the final cross section configuration through the corridor. Proposed roadway improvements must be weighed against environmental impacts, available funds, and impacts to adjacent property owners to optimize community value. The consultant will review the proposed cross sections in the 20-year Transportation Improvement Plan and compare these classifications to existing transportation modeling. The consultant shall prepare a supporting Access Management Plan.

INTERSECTION CONFIGURATION

The following intersections will be evaluated for improvements and preferred configuration to meet travel demands.

NE 18th St/NE 138th Avenue – Improvements to this existing signalized intersection are expected to be minimum.

NE 18th St/NE 141st Avenue – The existing signal will be upgraded to accommodate traffic needs as part of this project. A roundabout may also be considered.

NE 18th St/NE 148th Avenue – Travel demand will be reviewed at this intersection to determine if a signal or roundabout option are warranted.

NE 18th St/NE 155th Avenue – The existing signal will be upgraded to accommodate traffic needs as part of this project. A roundabout may also be considered.

NE 18th St/NE 162nd Avenue – Improvements to this existing signalized intersection are expected to be minimum.

Existing stop-controlled intersections will be reviewed to determine recommended intersection type for access to NE 18th St.

HORIZONTAL AND VERTICAL ALIGNMENT

The horizontal and vertical curves along the corridor will be designed to meet the current City of Vancouver's Street Standards. This section of the roadway has level to moderately rolling terrain and a straight alignment. Both horizontal and vertical alignments will primarily follow the existing terrain.

UTILITY IMPROVEMENTS

It is anticipated that storm sewer, water, sanitary sewer (City of Vancouver utilities), power, phone, gas and cable (private utilities) will all be protected, installed or improved as part of this Project. There are large power towers near that parallel NE 18th Street on the south side of the roadway. The Consultant shall coordinate the project design with the City utilities and the franchise utilities.

SURFACE WATER - LOW IMPACT DEVELOPMENT (LID)

The project will include improvements for the treatment of surface water quality and quantity. Based upon the requirements of the Washington State Department of Ecology Stormwater Management Manual for Western Washington, the entire impervious area of the roadway corridor must be treated for water quality for stormwater runoff. Infiltration potential will need to be investigated. Currently, the location of treatment facilities and the treatment methods (such as mechanical treatment or low impact development) have not yet been determined. The Consultant shall perform infiltration investigation and testing and shall coordinate and obtain approval with the City's Surface Water division. It is possible that the planter strips along NE 18th Street could be locations for Low Impact Development (LID) surface water treatment facilities.

WATER

The City of Vancouver has an older 12-inch water main that runs the length of the project along NE 18th Street, from NE 138th Avenue to NE 162nd Avenue. This main connects to smaller mains that serve individual neighborhoods, except for NE 155th Avenue. A new 24-inch water transmission line is anticipated to be part of the final design.

City of Vancouver in-house utility staff will provide direction for the consultant to design the utility size, type, and typical locations. The Consultant will include this information in the final design plans.

SANITARY SEWER

The City of Vancouver has an 8-inch sewer main that extends from NE 146th Avenue east to a manhole on the south side of NE 18th Street, just east of NE 148th Ave. This manhole is a key junction, with an 18-inch pipe coming in from the southeast and an 8-inch pipe from the east, before the flow is routed north across NE 18th Street. At the intersection of NE 155th Avenue and NE 18th Street, an additional manhole with 8-inch pipes services the homes on the north side of the street, with its outlet also heading north. It is anticipated that the sewer will require some minor adjustments but otherwise is to be protected.

City of Vancouver in-house utility staff will provide directions for the consultant to design the sewer size, type, and typical locations. The Consultant will include this information in the final design plans.

RIGHT-OF-WAY

The design challenges/issues mentioned above will likely have significant impact on the right-of-way needs along the corridor. The right-of-way costs and impacts will need to be part of the equation when considering the lane configuration and intersection design. It is anticipated that right-of-way plans, legal descriptions and right-of-way exhibits will be completed by the Consultant; and acquisition will be completed by the City of Vancouver. It is possible that, pending final design, one side of the proposed NE 18th Street would have more right-of-way allocated for the proposed multi-use trail.

TASK 1: PROJECT MANAGEMENT AND ADMINISTRATION (HHPR)

Subtask 1.1 Contract Administration, Invoicing, Scheduling and Progress Reporting

- The Consultant shall provide management, coordination, and direction to the Project team to complete the project on time and within budget. The City fosters

a partnership approach with all stakeholders in the Project. The Consultant shall integrate this strategy into the overall management approach. Project duration is estimated at 24 months.

- The Consultant shall prepare and submit monthly invoices. Each invoice will include: date period covered by invoice, number of hours worked during the billing period with billing rates shown; expenses and associated mark-ups; total cost for labor and expenses for the billing period; subconsultants fees including markups for the billing period; and a total amount summarizing labor, expenses, and subconsultant fees. The only markup for subconsultants will be for the B&O Tax no additional markup will be included in the billing by HHPR.
- The Consultant shall prepare a Contract Summary Report to accompany the monthly invoices. The Contract Summary Report will list each invoice as well as current invoice with an itemized summary of invoice numbers, dates, and amounts billed for labor, expenses, and subconsultants as well as total amounts for each invoice. The Contract Summary Report will also list the total amount billed to date, total amount remaining under contract, and contract expiration date
- The Consultant shall prepare a brief Project Status Report to accompany the monthly invoices. The Project Status Report will include: date period covered by Status Report, brief summary of work performed during the billing period, a notice to CITY raising any issues or concerns that could require a contract amendment/supplement, a brief summary of completed and/or upcoming project milestones, and action items needed from CITY for project delivery. CONSULTANT shall monitor the status of the budget and take corrective actions to correct undesirable budget trends involving the CITY if scope is impacted.
- The Consultant shall establish a quality management program and designate responsibility for review of technical work and other deliverable products.
- The Consultant shall maintain all contract-required documentation. Provide copies of project files and records to the CITY for audits and public information requests. All final documents shall be provided in electronic format as requested.

Project Scheduling

- The Consultant shall prepare and submit an activities list and schedule to the City immediately following the Notice to Proceed. The schedule shall show appropriate milestones for the Project, including intermediate and final submittal dates for design documents and key decision points.

- The Consultant shall prepare and maintain the project design schedule. The schedule shall identify CONSULTANT tasks and items provided by CITY and other consultants. The schedule shall be updated every month or as circumstances require or as requested by the CITY.
- At the 75% design stage, the City will assess the remaining project budget and funding status to determine a timeline for proceeding with the 90% design, 100% design/construction documents, and the construction phase of the project. Currently the project is not funded for right of way acquisition or construction.

Subtask 1.2 Meetings

This item includes the coordination and meetings necessary to successfully complete the project.

1) Attend project kickoff meeting with City Staff
2) Bi-weekly internal HHPR design team coordination and meetings
3) Preparation and submittal of a pre-design memorandum
4) Monthly project coordination meeting with City staff (assumed 24 months total)
5) Meet with City staff after the review of the 30%, 50%, 90%, and Final plan submittals
6) Public involvement meetings (assumed up to 24 monthly coordination meetings and 24 Public engagement meetings)
7) Meetings shall be held virtually by default

The Consultant shall schedule Project team meetings and prepare meeting agendas. This includes a Project kick-off meeting, monthly progress meetings, provide information and attend public meetings and open houses, review meetings and coordination meetings. The Consultant is expected to attend public meetings and open houses to explain and discuss the Consultant tasks on the Project, the Consultant shall prepare maps and exhibits associated with their tasks on the Project.

Project Coordination

- The Consultant shall organize and hold Project meetings with key Project team members, as well as representatives from the City of Vancouver and other agencies as needed. These meetings shall have specific agendas addressing and resolving Project issues as they are encountered.
- The Consultant shall coordinate Consultant tasks and activities with the City. This shall include using monthly meetings to plan and coordinate upcoming activities.
- The Consultant shall coordinate with private and public utilities, including power, phone, cable, gas and other utilities.

- The Consultant shall coordinate with Clark County Public Transit Benefit Area Authority (C-TRAN), Washington State Department of Transportation (WSDOT), the Evergreen Public School District (ESD), and the Bonneville Power Administration (BPA).
- The Consultant shall coordinate with property owners adjacent to the Project who will be affected by the roadway design. Prior approval from the City's Project Manager will be required before any contact with neighborhood associations or private property owners occurs.
- Prior to the 90% design stage, the City will assess the remaining project budget and funding status to determine a timeline for proceeding with the 90% design, 100% design/construction documents, and the construction phase of the project. Currently the project is not funded for right of way acquisition or construction. This scope and fee includes final design/construction documents.

Task 1 Deliverables

- Monthly invoices, Contract Summary Reports and Project Status Reports
- Meeting Agendas and Meeting Summaries
- Project Design Schedule & Schedule Updates

TASK 2: TRAFFIC ENGINEERING - TRAFFIC ANALYSIS (GTEng)

Subtask 2.1 Traffic Engineering Project Management

Subtask 2.1.1 Project Coordination and Meetings

This task is associated with Consultant's project management of the traffic analysis, functional design, and design phases associated with this project.

- Prepare up to 24 monthly progress reports associated with Traffic Analysis and Design Phases. To be provided with monthly invoicing of project.
- Support consultant team in preparing meeting agendas and minutes related to traffic elements of the project.
- Project kickoff meeting with City staff.
- Prepare for and participate in up to 24 project team meetings with City staff.
- Internal consultant team meetings:
    - Prepare for and participate in up to 24 consultant team meetings.

Subtask 2.1.2 Public Involvement

This task is associated with traffic engineering and planning support for the public involvement process.

- Sounding Board Group Meetings (Tier 1 Stakeholder Engagement).
  - Preparation for and attendance of a senior transportation engineer and transportation analyst at the design charrette.
  - Preparation for and attendance of a senior transportation engineer at second and third sounding board group meetings.
  - Provide meeting summary notes regarding traffic related items.
- Communications and Media Relations (Tier 1-3 Stakeholder Engagement).
  - Provide traffic-related information for mailers.
  - Provide traffic-related information for press releases.
- Project Website (Tier 1-3 Stakeholder Engagement).
  - Support development of graphics for website (Up to 8 hours of GTE staff support assumed).
  - Provide roundabout related narrative.
- Three Open Houses (Tier 1-3 Engagement).
  - Prepare for and attend three public open house meetings.

Subtask 2.2 Traffic Analysis Report

The City will provide traffic counts and traffic forecasting.

Subtask 2.2.1 Existing Transportation Facilities and Traffic Conditions

Existing transportation facilities shall be inventoried, including the following:

- Roadway facilities, consisting of the number of travel lanes lane and shoulder widths, presence of curbs and sidewalks along NE 18th Street and its intersecting roadways.
- Public and private access along NE 18th Street between NE 138th Avenue to NE 162nd Avenue.
- Location and width shall be identified and spacing between access points calculated. (See “Access Management” section below.)
- Pedestrian facilities, including the location and width of existing sidewalks, crosswalks and pathways. Any interaction/connection with the City’s current or proposed trail system shall be reviewed.
- Transit routes that run along or intersect NE 18th Street. The location of routes and transit stops shall be identified.
- Weekday AM and PM peak hour and midday weekend turning movement counts shall be collected at key locations. These will include NE 18th Street at the following locations:

a. NE 138th Avenue
b. NE 141st Avenue
c. NE 148th Avenue
d. NE 155th Avenue
e. NE 162nd Avenue

- Two Twenty-four-hour vehicle classification counts shall be collected on NE 18th Street between NE 138th Ave to NE 162nd Ave.
- Prepare existing conditions operational analysis of the key intersections and driveways, including documentation of performance measures including level of service, delay, queues, etc.
- Summarize the existing conditions analysis in Technical Memorandum #1 that will be incorporated into Traffic Analysis Report (see Subtask 2.2.4).

Subtask 2.2.2 Future Traffic Conditions

- Review base year and future year 2045 traffic forecasts and turning movements at key intersections using the model operated by the Southwest Washington Regional Transportation Council (RTC).
    - City of Vancouver will coordinate required model runs with RTC.
- Prepare an assessment of future demand and operations for approved in-process development that may affect the NE 18th Street project.
- Coordination with Evergreen High School about any future construction of facilities.
- Develop future weekday PM peak hour traffic volume projections at the study intersections.
- Travel Demand Validation: Future travel demand shall be estimated at key intersections along NE 18th Street. Future intersection operations shall be evaluated to determine how they will operate with the projected traffic demand. Potential mitigations shall be identified to accommodate future traffic demand. The following intersections along NE 18th Street:
    a. NE 138th Avenue
    b. NE 141st Avenue
    c. NE 148th Avenue
    d. NE 155th Avenue
    e. NE 162nd Avenue
    - Preliminary traffic signal warrants shall be evaluated at the unsignalized study intersections to determine whether new traffic signals will be needed in the future and when those signals will be needed (sensitivity analysis). If warranted, the operation of the study intersections assuming signalization shall also be evaluated.

    - Analyze roundabout operations at intersections under 2045 traffic conditions during the weekday AM and PM peak hours. The capacity, delay, and queue lengths will be evaluated for each roundabout approach to confirm the appropriate roundabout size and number of lanes needed to service the forecast traffic volumes.
    - A combination of signalized intersections and roundabouts may be used together throughout the corridor.
- Perform all required traffic analysis and demand forecasting.
- Intersection layout requirements shall be identified at the study intersections, including lane configuration and queue distances.
    - Evaluate left-turn lane warrants and right-turn lane warrants at the unsignalized study intersections, as appropriate.
    - Conduct a queuing analysis of projected 2045 weekday AM and PM peak hour conditions to determine storage length needs at the project study intersections, as appropriate.
- Summarize the future traffic conditions in the Future Traffic Conditions Technical Memorandum #2 that will be incorporated into the Traffic Analysis Report (see Subtask 2.2.4)
    - This memorandum will document the preferred intersection traffic control for the key intersections (signals versus roundabouts).

Subtask 2.2.3 Access Management Plan (HHPR & GTE)

- The Consultant will assist the City with the development of an Access Management Plan (AMP) for the Project corridor. This will include a description of the relationship of access management to the daily operational safety of vehicular travel, as well as multi-modal features of the proposed roadway. The effect of driveway design on traffic operations and safety will also be analyzed and reported.
- The Consultant will work with City staff and other stakeholders to provide advice and to respond to concerns on the proposed AMP.
- The AMP will be developed taking into consideration current conditions, land uses, agreements, signals vs. roundabouts options as well as other projected and anticipated transportation plans.
- The Consultant will Coordinate their effort with the City's Traffic Engineering Division's on-going Access Management research and development program. This research, which involves a survey of other jurisdiction's ordinances, Access Management Plans and standards, will provide technical background for the Consultant's recommendations to the City for the Project corridor.

The Consultant will review the City's existing design and development codes, identifying any shortcoming(s) in these codes which would limit the implementation of the AMP.

This work will include the following:

- A review and evaluation of the City's Comprehensive Plan and Development Ordinance
- A review and evaluation of the applicable sections of the City of Vancouver Municipal Code
- Coordination with City's Public Works Department Traffic division to determine applicability of the AMP to the Project corridor
- A report of necessary changes to existing codes to be submitted to the City for their evaluation and recommendation
- Identification of all existing and approved access points and the uses that they serve.
- Property owner outreach and engagement to understand individual needs, plans, and aspirations.
- Identification of operational and safety implications of the existing access points and their potential relationship to the proposed roadway improvement project.
- Evaluation of existing land uses, potential redevelopment opportunities, and the impacts and opportunities of potential future land uses.
- Identification of access consolidation and closure opportunities, including potential near-term and long-term opportunities.
- Identification of traffic volume and speed implications along the NE 18th Street corridor and local residential streets surrounding as they relate to AMP alternatives. Preparation of a draft and final Access Management Plan (AMP), including identification of potential City code or policy improvement needs, which will be incorporated in the Traffic Analysis Report (see Subtask 2.2.4).

City staff will provide the following information:

- Comprehensive Plan
- Land Use and Development Ordinance
- Adopted or draft area plans
- Other relevant planning information

Subtask 2.2.4 Traffic Analysis Report

- Preparation of a draft and final Traffic Analysis Report that summarizes the project elements above and integrates with the Access Management Plan.
- Submit the draft report to the City for review and comment.
- Respond to City comments and submit a final Traffic Analysis Report.
- Coordination with noise team of the report findings and provide traffic volume information and preliminary channelization requirements for their analysis.

Task 2 Deliverables

- Roundabout related materials and graphics as described above in support of the Public Involvement effort.
- Existing Traffic Conditions Technical Memorandum #1
- Future Traffic Conditions Technical Memorandum #2
- Draft and Final Access Management Plan
- Travel demand validation
- Ultimate lane configuration recommendation along the corridor
- Roundabouts vs. Signals documentation
- Draft and Final Traffic Analysis Report

TASK 3: DESIGN ENGINEERING - PLANS, SPECIFICATIONS & ESTIMATE (PS&E); EVALUATION OF ALIGNMENT OPTIONS INCLUDING OPTIONS FOR TRAFFIC SIGNALS VS. ROUNDABOUTS

Subtask 3.1 Design

The Consultant will advance the design at the conclusion of the preferred intersection control and configuration to preliminary (30%), 50%, and 90%, and Final construction contract documents as part of this task. The HHPR Team, including GTEng and Columbia West, will be responsible for design engineering services and for delivering the submittals as outlined below.

The design shall conform to the City of Vancouver drafting Standards and Specifications, including incorporating City-provided survey data and drafting standards.

The City will provide the Consultant with all required field survey work, including topographic and existing right of way mapping. The City will provide electronic files of the existing survey data, digital terrain model and topography in AutoCAD format.

Subtask 3.1.1 Preliminary (30%) Design

The Consultant will develop preliminary construction documents to the 30% design stage. These documents will assist in the permit process and will consist of plan sheets, a preliminary opinion of probable construction cost, and a conceptual stormwater and utility design. At this design level, the overall project layout, footprint, and geometrics are established, and key design decisions are made.

- Based on the results of the Traffic Analysis, the Consultant will prepare sketch-level design concepts for 5 study intersections: NE 138th Avenue
    - NE 141st Avenue
    - NE 148th Avenue
    - NE 155th Avenue
    - NE 162nd Avenue

    a. Using the topographic survey base map, prepare scaled, sketch-level design roundabout/signalized geometric design concepts for up to 23 alternatives per intersection. Sketch concepts will depict critical intersection features and will consider:
        - Size and location relative to right-of-way and geometric constraints
        - Alignment of approaches and number of lanes
        - Design speed and speed consistency
        - Design vehicle turning movements
        - Pedestrian, bicycle, and transit accommodations
        - Local access impacts
        - Basic channelization

    b. Review and discuss sketch concepts with the project design team. Prepare alternative analysis memorandum, specifying recommended section and intersection options with decision matrix. Work collaboratively with the City and project design team to identify preferred intersection concept for further refinement.

- Initial CAD Intersection and Corridor Design.

    a. Prepare 15%-level preliminary intersection designs at the study intersection and corridor, in AutoCAD, for up to two preferred sketch layouts. The designs will include basic horizontal geometric design elements, including edges of travel way, channelization striping and islands, sidewalks, crosswalks, and truck apron. The designs will ensure the geometry incorporates key operational and safety features including

design speed objectives, speed consistency principles, design vehicle accommodations, and bicycle/pedestrian treatments.

b. Prepare sketch-level drawings showing "fastest path" design speeds for all critical approaches of the roundabout(s) in accordance with NCHRP Report 672.
c. Prepare engineering drawings showing vehicle paths through critical turning movements of the intersection for the design vehicle.
d. Evaluate stopping and intersection sight distances at roundabout in accordance with guidelines from NCHRP Report 672. Determine the sight distance triangles needed at each roundabout approach and within the central island as a guideline for potential easements and landscape design. Prepare an exhibit showing the recommended sight lines.

The 30% plans shall include:

- Cover Sheet
- General Notes and Legend Sheet
- Plan and Profile Sheets showing basic roadway geometry information and incorporating recommended intersection geometry, lane configurations, median locations and access management.
- Preliminary Retaining and Sound Wall Plans
- Preliminary Utility Plans showing conceptual stormwater, water and sanitary sewer layouts

Deliverables

- 30% Plans
- 30% Construction Cost Estimate

Subtask 3.1.2 60% Design (PS&E)

The consultant will develop construction documents to the 60% design stage. These documents will consist of plans, draft specifications, a bid item list, an opinion of probable construction cost, and an anticipated construction schedule.

Traffic Signal Design

- Design conference with the City Project Manager and Traffic Engineer at design kick-off.
- Identification and confirmation of the traffic signal phasing and operations plan, turn lane storage needs, detection requirements, pedestrian and bicycle elements, and other key assumptions.

- Preparation of preliminary signal equipment layout for City review and approval, including revisions as needed.
- Fiber optic interconnect plan along NE 18th St from SE 138th Avenue to NE 167th Avenue, as appropriate for network communication purposes.

Channelization and signing Design

- Field reviewing the existing signing and striping within the vicinity of the project from the City (if available).
- Conduct a site visit to inventory the existing conditions and verify the survey.

Street Lighting Design

- Participate in a design conference with the City Traffic Engineer and Clark Public Utilities at before street lighting design kick-off.
- Review the existing street lighting as-built drawings within the vicinity of the project from the City and explore the opportunity to extend existing system if possible.
- Identification and confirmation of the desired lighting poles and fixtures.

Specifications

- The Consultant shall prepare Project Special Provisions, and a proposal sheet as required by the design. The Contractor shall submit draft specifications at the 60% design stage. Project specifications shall comply with the City of Vancouver Standard Specification format. The Contractor shall be responsible for updating the Amendments and General Special Provisions to current Washington State Department of Transportation Standard Specifications for Road, Bridge, and Municipal Construction.

The 60% plans shall include:

- Cover Sheet
- General Notes and Legend Sheet
- Preliminary Site Prep/Demolition Plans
- Typical Section
- Plan and Profile Sheets showing basic roadway geometry information
- Intersection Plan showing roundabout layouts and ADA grading
- Miscellaneous details
- Utility Plan – Updated general concepts for stormwater, water and sanitary systems and facilities.
- Preliminary Erosion Control and Grading Plans

- Preliminary Retaining Wall and Sound Wall Plan and Profile
- Preliminary Retaining Wall and Sound Wall Details
- Preliminary Signing and Striping Plans
  Preliminary Signal Equipment Layout
- Preliminary Fiber Optic Interconnect Plans
- Preliminary Streetlighting
- Preliminary Joint Utility Trench Plans
- Conducting a photometric analysis to determine a conceptual-level street light pole layout.
  - It is assumed that standard Type A cobra lighting will be provided based on the Principal Arterial classification.
  - This assumes roadway lighting along the entire length of the project study corridor.
- Preliminary Landscape Plans
- Preliminary Construction Staging Plans
- Preliminary Construction Signing

Other documents to submit with the 60% plans:

- Preliminary cut and fill line determination.
- Preliminary stormwater analysis, preliminary basin delineation map, and conceptual layout.
- Comment response log (include comments on 30% submittal and responses)

Deliverables

- 60% Plans
- 60% Construction Cost Estimate
- 60% Specifications

Subtask 3.1.3: 90% Design (PS&E)

The consultant will address review comments from the 60% plans and develop construction documents to the 90% design stage. These documents will consist of plans, specifications, a bid item list, an opinion of probable construction cost, and an anticipated construction schedule.

Stormwater / Hydrology

- Available data relating to the drainage and water resources for the Project area shall be collected and reviewed from Federal, State and local agencies. Existing and proposed drainage features and information on drainage problem areas

shall be incorporated into the Project plan and profile sheets, along with establishing groundwater elevations.

- A preliminary Hydrology Report shall be prepared containing all drainage calculations for the Project. Two (2) copies shall be submitted for City review and comment. Three (3) copies of the final report shall be submitted when revised.

The 90% plan set shall include the following:

- Cover Sheet
- General Notes and Legend Sheet
- Site Prep/Demolition Plans
- Typical Sections
- Plan and Profile Sheets
- Intersection Plans
- Miscellaneous Details
- Utility Plan and Profile for water and sanitary sewer
- Storm Drain Plan and Profile
- Stormwater Facility Plan and Detail Sheet
- Erosion Control and Grading Plans
- Retaining Wall and Sound Wall Plan and Profile
- Wall Details
- Signing and Striping Plans
- Traffic Signal Plans
- Fiber Optic Interconnect Plans
- Streetlighting
- Joint Utility Trench Plans
- Landscape Plans
- Landscape Detail Sheets
- Preliminary Irrigation Plans
- Preliminary Irrigation Detail Sheets
- Construction Staging Plans
- Construction Signing Plan
- Site Specific Traffic Control Plans

Other documents to be submitted with the 90% plans:

- Compile stormwater analysis from 60%, update the analysis to match the 90% level design and prepare the preliminary stormwater / Hydrology report.

- Identify which bid items will require special provisions.
- Prepare 90% Level Project Specifications including GSP's and special provisions necessary for this project.
- Comment response log (include comments on 30%, and 60% submittal and responses)

Deliverables

- 90% Plans
- 90% Construction Cost Estimate
- 90% Specifications
- Preliminary Stormwater / Hydrology Report

Subtask 3.1.4 Final Design (PS&E)

The consultant will address review comments from the 90% plans and develop construction documents to the 100% and Final design stage. These documents will consist of plans, specifications, a bid item list, an opinion of probable construction cost, and an anticipated construction schedule. Final documents will be sealed as appropriate for jurisdictional engineering review.

Address the 90% comments. 100% and final design phase plan set shall include:

- Cover Sheet
- General Notes and Legend Sheet
- Site Prep/Demolition Plans
- Typical Sections
- Plan and Profile Sheets
- Intersection Plans
- Miscellaneous Details Sheet
- Utility Plan for water, sanitary sewer
- Storm Drain Plan and Profile
- Stormwater Facility Plan and Detail Sheet
- Erosion Control and Grading Plans
- Retaining Wall Plan and Soundwall Plan and Profile
- Wall Details
- Signing and Striping Plans
- Traffic Signal Plans
- Fiber Optic Interconnect Plans
- Streetlighting and Joint Utility Trench Plans

- Landscape Plans
- Landscape Detail Sheets
- Preliminary Irrigation Plans
- Preliminary Irrigation Detail Sheets
- Construction Staging Plans
- Construction Signing Plan
- Site Specific Traffic Control Plans
- Standard Detail Sheets

Other documents submitted with the final plans:

- Address preliminary stormwater report comments and submit final stormwater report for approval.
- Prepare final special provisions as needed for nonstandard items shown on the plans, and compile the project specifications.
- Address City review comments regarding the plans, specs, and estimate.
- Comment response log (include comments on 30%, 60%, and 90% submittal and responses)
- Preparation of the project NPDES permit application, and posting the Notice of Intent (N.O.I.) in an appropriate local news paper
- Preparation of the project SWPPP
- Prepare and submit final bid package

Deliverables

- 100% Plans
- 100% Construction Cost Estimate
- 100% Specifications
- Contract Documents in word format and cost estimate in excel.
- Final CAD drawings and Civil 3D.
- Copies of Bid Package, assume a maximum of 30 copies to bidders
- Final Stormwater Report
- Copy of NPDES Permit Application
- Copy of SWPPP

Subtask 3.2 Site Investigation, Utility Data Collection, and Coordination

Subtask 3.2.1 Site Investigation

Perform a site investigation to review existing information and applicable standards to gain a complete understanding of the project area, known issues, and established

utility processes. The Consultant shall obtain all available utility records within the project boundaries from individual utility companies and review them. The Consultant shall work directly with the owners of existing utilities to identify requirements related to their relocation or modification.

Subtask 3.2.2 Utility Coordination
Identify utilities within the project limits, then obtain and review their system mapping. Conduct a utility reconnaissance of the project area to verify the presence of aboveground and underground utility facilities, confirm the utility-provided maps, and ensure consistency with the project base map.

Serve as the Single Point of Contact throughout the design phase for utility coordination. Address utility requests for project information and design documents, including the distribution of design plans. Serve as liaison between utilities and the Project Design Team. Identify and discuss with each utility any special requirements associated with their facility relocation or modification. Assume up to 1 hour per week throughout the duration of the project. Assume coordination with six utility operators.

Design plans shall be sent to the utility companies at the completion of preliminary design (30%),50%, 90%, and Final design stages.

Prepare a Utility Report for utilities within the project corridor. The report will outline:

- Potential utility conflicts within the project area
- General location, type, size, material, and typical depth of existing facilities
- Project construction requirements and probable conflict resolution
- General description of potential conflicts and caveats related to the relocation process

Submit a draft report electronically for review and a final report electronically upon
Submit a monthly utility coordination report with each invoice.

Subtask 3.2.3 Utility Meetings
Prepare for and attend up to three meetings, not including the overall project kickoff meeting, to strategize and plan utility coordination and relocations with the City and/or Project Design Team.

Organize up to three group and up to five individual utility meetings, as necessary, to share current project information. Meeting topics will include known facilities, potential impacts, timing required for potential relocations, and reimbursable

requirements. Meetings will also provide a forum for utilities to share their relocation plans with one another to promote compatibility between relocation designs and construction sequencing. Prepare and distribute meeting agendas and meeting summaries to all attendees. If a temporary shutdown of BPA facilities is required during construction, additional meetings with BPA will be necessary for planning and coordination.

Subtask 3.2.4 Conflict Identification, Analysis, and Recommended Resolution
Identify and analyze utility conflicts. Compile and distribute utility conflict lists, including aboveground, surface, and underground facilities. Make recommendations to utilities for conflict resolution.

Prepare utility conflict plan sheets based on 50% design plans. Include utility conflict spreadsheets indicating conflict item number, utility type, conflict status, average cover during and after construction, location relative to right-of-way, and additional comments.

Prepare a Utility Conflict Report summarizing identified utility conflicts. Send conflict letters to each affected utility identifying the specific conflicts and required adjustments. Prepare a schedule for the necessary adjustments to be made prior to the start of construction.

Revise conflict analysis and associated spreadsheets based on 90% design plans.

Revise conflict analysis and associated spreadsheets based on 100% design plans.

Subtask 3.2.5 Conflict Notification and Utility Relocations
Notify impacted utility companies and coordinate their efforts in developing and implementing relocation plans that resolve conflicts with the project design.

- Prepare and deliver Conflict Notices to each involved utility owner. Notices will include a conflict list and conflict map. Assume up to six utility operators. Notices shall request a utility response, including a proposed facility adjustment plan and schedule for completing the work. Allow each utility a 30-day response period from the date of notice.
- Review utility relocation plans to verify that identified conflict items have been addressed and that the plans are compatible with the Project's construction requirements. Provide written approvals of the utility relocation plans. Assume a total of nine reviews (average of 1.5 reviews per utility).

Assumptions

- The City will provide utility plans, GIS, and other available records for City-owned utilities within the project area.
- The City will provide pertinent franchise utility system mapping and agreements in its possession.
- Utility design location fees, if required, are not included in the Consultant's scope and will be paid by the City.
- Utilities are responsible for providing designating and locating information for their facilities at their own expense.
- Any additional right-of-way or easements required for relocated utilities will be the responsibility of the utilities or the City, depending on prior rights.

Deliverables

- Meeting agendas and summaries for each utility meeting
- Monthly utility coordination reports
- 30% submittal: Existing utilities identified and marked on survey base mapping
- Utility Report based on 30% plans, submitted within 20 days of the 30% submittal
- Preliminary utility conflict analysis based on 50% plans, submitted within 20 days of the 50% submittal
- Utility Conflict Report
- 90% utility conflict analysis based on 90% plans, submitted within 20 days of the 90% submittal
- Conflict notice letters and attachments for each utility
- 100% utility conflict analysis based on final plans, submitted within 15 days of the 100% submittal
- Review comments on utility relocation plans

Subtask 3.3 Geotechnical Engineering (CW)

Columbia West will conduct a geotechnical investigation to evaluate subsurface soil conditions along the project alignment and develop geotechnical design recommendations and construction guidelines for the proposed roadway widening and improvements, including roadway embankments, stormwater infiltration and detention facilities, retaining walls, traffic signals, and sound walls (if necessary). The work will be conducted in general conformance with Washington State Department of Transportation's (WSDOT's) Geotechnical Design Manual, Washington State Department of Ecology's (WSDOE's) Stormwater Management Manual for Western Washington (SMMWW), and the City of Vancouver's (City's) Surface Water/Stormwater Design and Construction Requirements.

Specifically, Columbia West will provide the following services:

1. Review readily available geologic, groundwater, and soil survey maps that cover the project vicinity.
2. Conduct a site reconnaissance.
3. Mark the proposed exploration locations in the field and notify the "One Call" service for public utility locates. Also, engage services of private utility locating subcontractor specific boring locations.
4. Prepare traffic control plans for and provide traffic control during completion of field explorations. Traffic control plans will be approved by City Public Works staff prior to performing work.
5. Advance up to 15 mechanically drilled borings to characterize subsurface soil conditions, provide recommendations for the project. We anticipate that between 5 and 7 days will be required for drilling. Borings will be drilled to depths up to 10 or 25 feet below grade. Final depths will be based on anticipated depths of infiltration systems and locations of signal poles, retaining walls, and sound walls.
6. Maintain a log of the soils encountered in the explorations and collect soil samples for laboratory testing.
7. Groundwater is mapped as more than 100 feet below existing grades. Based on this, Columbia West will not install monitoring wells.
8. Conduct up to 9 infiltration tests at up to 6 exploration locations. Tests will be conducted at locations and depths proposed by HHPR. We anticipate that up to 3 locations may have infiltration tests at two depths (e.g. shallow and deep).
9. Restore the explorations in the following manner:
    a. Borings - Backfill the drilled borings/monitoring wells in accordance with WSDOE standards. In paved areas, the surface of the boreholes will be patched with concrete or asphalt. Excess soil cuttings from the borings will be left adjacent to the boreholes in open fields, and removed from the site in developed areas.
10. Conduct a program of laboratory testing on select soil samples, including up to:
    a. 12 particle-size distribution tests (sieve analyses)
    b. 25 percent fines determinations (percent passing the No. 200 sieve)
    c. 25 moisture content and/or density determinations
    d. 6 Atterberg Limits determinations
    e. 9 cation exchange capacity determinations
    f. 9 organic content determinations
    g. 2 one-dimensional consolidation tests
11. Conduct engineering analyses to evaluate: Embankment construction alternatives.
    a. Stability of pond and roadway embankments.

b. Settlement potential in organic soils for roadway embankments (if present).
c. Retaining wall earth pressure design parameters (including active, at-rest, and passive pressures).
d. Retaining wall foundation design parameters (if necessary).
e. Traffic signal foundation design parameters (if necessary).
f. Seismic design parameters.
g. Liquefaction and earthquake-induced ground settlement potential.
h. Design criteria for pond liners and ballast (if needed).

12. Prepare a draft geotechnical report summarizing the results of the subsurface exploration and laboratory testing programs, and presenting appropriate recommendations and conclusions.
13. Prepare a final geotechnical report incorporating requested changes/updates from the project team's review of the draft report.
14. Prepare a memorandum documenting groundwater level readings.
15. Provide project management and support for our work, including coordinating Columbia West staff and subcontractors, invoicing, email and telephone communications with the project team, other incidental administrative services required for the project, and attendance at up to two project meetings.

Assumptions

The above scope of work and attached fee estimate are based upon the following assumptions:

- The City or others in the Consultant team will obtain right of entry permission for all explorations and monitoring well installations.
- Field work will be performed during daylight hours with approved traffic control.
- If contaminated soils are encountered, then additional charges will be incurred for equipment decontamination, testing, and soil disposal.
- If needed, the City will issue a street use permit at no cost to the Consultant.
- Abandonment of the groundwater monitoring well is not included in our scope. We have assumed that this task will be completed during construction by the project contractor.

Deliverables

- Site plan with proposed boring locations
- Traffic control plan for City approval
- Draft geotechnical report
- Final geotechnical report

Subtask 3.4 Structural Engineering

Sound Walls Along NE 18th Street: The consultant will prepare 30%, 50%, and 90% and final construction contract documents for sound walls along NE 18th Street. HHPR will provide the plan and profile drawings for the sound walls, and the Consultant

structural engineer will provide the structural engineering and details, and unit cost data for the cost estimate.

Assumptions

- Soil conditions are such that shallow spread-footing-type foundations can be used.
- Sound walls are anticipated to be constructed out of reinforced concrete with decorative reliefs achieved with form liners.

Deliverables

- Design documents (details) in electronic format at each of the 30%, 50%, 90% and final design stages
- Review comments provided to HHPR regarding the plan and profile sheets prior to submittal of documents at the stages listed above
- Final design documents in full-size paper copies; quantities sufficient for submittal to City of Vancouver for review
- Structural calculations at the final design stage

Subtask 3.5 Landscape Architecture

The Consultant will prepare 30%, 50%, and 90% and final construction contract documents for tree preservation, planting, and irrigation along NE 18th Street. The Consultant will provide the plans, special provisions and estimate for all landscape related bid items. It is anticipated that drawings will include details for center of roundabout designs, street trees, plantings, irrigation, and site furnishings.

Assumptions

- Retaining and/or sound walls will be designed by the structural engineer. The Landscape Architect may provide artistic consultation.
- Planting and irrigation for storm water treatment is included in the Landscape Architect's scope.
- The Landscape Architect will coordinate planting design with project stakeholders as requested by the City of Vancouver.

Deliverables

- Exhibits, including renderings, as requested for public outreach meetings.

Subtask 3.6 Right-of-Way (ROW) Plans

The Consultant shall review the preliminary ROW plans, and provide necessary information to the City about the project designs at the 30 – 50% design stage. The City will use the information to develop the ROW plans for the project.

All necessary ROW plans, exhibits for right of way takes, easements and temporary construction permits will be prepared by City staff. The City will also provide services for legal descriptions, property appraisals, negotiations, and acquisitions. (Please

note: this Project does not have ROW funding at this time therefore ROW needs may change as a result of future development contributions or due to funding constraints).

Subtask 3.7 Grade Sheets
The Consultant shall prepare grade sheets for Project construction using station-offset format. The grades shall be tabulated for top surface and sub-grade at centerline, midpoints of roadway, gutters and tops of curbs. The grades shall be provided at 25-foot intervals longitudinally and at points of horizontal and vertical curvature.

Deliverables
- Grade sheets electronic format

Task 3 Deliverables
- Utility Conflict Report
- Geotechnical Report
- Hydrology Report
- Travel Demand Validation
- Ultimate lane configuration recommendation along the corridor
- Roundabouts vs. Signals documentation
- Roadway Plans (as needed)
- Storm Drain Plans
- Water and Sanitary Sewer Plans
- Structure Plans (noise walls)
- Specifications and Cost Estimate

TASK 4: ENVIRONMENTAL EVALUATION AND PERMITTING (HHPR)
The City of Vancouver has completed an Environmental Assessment (EA) and Section 4(f) evaluation for the entire corridor (NE 86th/87th Avenue to 192nd Avenue). The Finding of No Significant Impact (FONSI) was signed by the FHWA on April 18, 2006 . The Consultant shall use the EA for the corridor as the basis for the final design. The EA includes a grade-separated intersection at NE 18th Street and NE 112th Avenue. Both WSDOT and the City of Vancouver would like to change this to an at-grade intersection, which may require an update to the EA. Additionally, several parcels along the corridor have been redeveloped since the approval of the EA, which may require an update to the EA's noise study. The EA addresses NEPA compliance issues. Additionally, the Consultant shall provide documentation to comply with the City of Vancouver Critical Areas Ordinance, Cultural Resources Ordinance, and prepare a SEPA Checklist. The Consultant shall prepare the NPDES application and SWPP Plan for the Project.

Subtask 4.1 Review of Previous Environmental Studies

The Consultant will be required to follow the mandated Environmental Procedures outlined below:

- Update and verify all aspects of the Environmental studies and Cultural Resource Report prepared for the corridor. This task shall be accomplished through agency consultation, use of existing databases, and, where necessary, additional fieldwork. The update will be essential to minimize unanticipated permitting or consultation requirements late in the process. Of particular importance will be determining the status of the Project area with regard to Threatened and Endangered Species (see below).
- Reevaluate the listed wildlife and plant species during the design process, to identify which species and designated critical habitat occur within the Project area. The EA prepared for the Project includes evaluations of both proposed critical habitat and candidate species. Over the course of the design it is necessary to ensure that no new proposed listings have occurred for species within the Project area. This includes monitoring and identifying permitting changes during design and/or due to design changes from the original EA.
- Contact City, County, and State environmental staff to obtain and review previous studies completed for other projects in the vicinity of the proposed NE 18th Street improvements, including the following:
    - Environmental documentation and reports for the NE 18th Street Improvement Project
    - Environmental documentation and reports for the Burton Road/28th Street Improvement Project.
    - Environmental documentation and reports for the NE 138th Avenue 18th to 28th Street Project.
    - City and County critical resource area designation information
    - Natural Heritage Program Database and critical habitat information
- Determine requirements for updating environmental studies and identify any gaps in the data. The Consultant shall prepare a memorandum summarizing previous environmental studies, and what each covers. This information shall be used to avoid duplicating efforts. To the extent feasible, the previous studies shall be used to update the Local Agency Environmental Classification Summary (LAECS) approved by WSDOT for the corridor.
- Technical Studies
- The technical studies described below shall supplement existing studies and shall be used for the design and permitting efforts. The Consultant shall contact staff at the various agencies to obtain information for the area, and conduct the analysis needed to support the assessment documentation.

Deliverables

- Draft Permit Summary Memo (one electronic copy)
- Final Permit Summary Memo (one electronic copy)

Subtask 4.2 Noise Analysis (MMA)

The existing noise study within the environmental assessment for the NE 18th Street project was performed in 2005 and is no longer valid. Revisions to the state and federal regulatory framework for noise studies requires a completely new noise analysis. Because this project will likely seek federal funding, this new noise analysis will follow Title 23 of the Code of Federal Regulations (CFR) Part 772, *Procedures for Abatement of Highway Traffic Noise and Construction Noise* July 2010, as administrated by the Federal Highway Administration (FHWA). This federal law is further regulated by the Washington State Department of Transportation (WSDOT). WSDOT has a set of rules provided in the Chapter 446, Noise, Environmental Manual, M 31-11.29, WSDOT December 2024. By Federal Law, all noise studies for roadways and highways receiving federal funds must follow the procedures and methods found in these documents.

As part of the noise study, a reconnaissance of the project area will be performed to identify all land use types and locate noise-sensitive properties within 300 to 350 feet of the project area. The noise study area of 300 to 350 feet is typically more than sufficient to assure all potential traffic noise impacts are identified when analyzing a five lane main arterial roadway with speeds of 35 mph or less. If necessary, the study area may be expanded to include properties close to the study area limits. Physical and terrain features that affect noise propagation and features that may be altered during construction shall be identified and included in this analysis.

Noise validation measurements and traffic counts will be conducted at several sites along the existing corridor as needed to validation the FHWA Traffic Noise Model (TNM version 2.5). The data can also be used to assist with providing a description of existing noise levels that are representative of the land uses along the proposed alignments. An estimate of 6 noise monitoring sites will be needed for this project. The noise measurements will be conducted for a 15-minute sampling period during daytime off-peak hours (10 AM to 4 PM) when traffic is moving freely. Traffic counts and vehicle type classifications (cars, medium trucks and heavy trucks) will be conducted concurrently with the noise measurements. All noise sources will be noted and those that may interfere with a determination of noise abatement will be identified.

Traffic noise levels at each validation measurement site will be predicted using the TNM with the existing roadway configuration and the traffic counts taken during the

noise measurement survey. The sound level predictions from TNM will be compared with the measured sound levels to reach an agreement of ± 2 dB as required by WSDOT.

Based on site inspections, a review of aerial mapping, and area land use, a set of representative noise modeling sites will be located throughout the project area and added to TNM. Frequently, one modeling location will be used to represent two or more nearby locations expected to have similar or slightly lower noise levels than the modeling location. The number of modeling sites will be sufficient to accurately predict traffic noise levels for the existing conditions, future (year 2045?) No-Build conditions, and the future Build traffic conditions. It is estimated that up to 70 individual noise modeling sites may be needed to represent traffic noise levels along the project corridor.

Using the validated TNM, existing peak hour traffic volumes from project traffic engineers will be used with posted speed limits to calculate existing peak hour noise levels at each of the modeling sites. Traffic noise level projections will also be performed for the same sites using the future No-Build traffic volumes. These predicted noise levels will be used to establish the existing conditions and for comparison with the future Build noise levels. The existing and future N-Build noise levels will also be used to aid in the understanding of the potential change in project area noise levels without the project.

Future Build peak hour traffic noise levels will be modeled at the same selected noise-sensitive sites with the proposed Build roadways and ancillary facilities included. Future Build traffic volumes and vehicle mixture will be provided by project traffic engineers, and will be modeled using the proposed future speed limits. The future Build traffic noise levels will be compared to the approach or exceed and allowable increase noise criteria using the WSDOT policy. For residences, noise impacts occur if future traffic noise levels approach or exceed 66 dBA Leq during peak hours, or increase by 10 dB or more over the existing conditions.

In accordance with FHWA and WSDOT requirements, noise abatement measures will be considered under the Build alternative at locations within the study area where traffic noise impacts are predicted. Noise abatement measures FHWA and WSDOT will consider include noise walls and berms. Other noise reducing measures, including project design measures, must be included as part of the project design. The noise analysis will provide the location, length, height, profile, estimated cost (using WSDOT policy), and number of benefiting noise-sensitive properties for any proposed barrier(s). The barrier information will be used for comparison with WSDOT criteria for

reasonable and feasible noise abatement. If noise abatement meets the WSDOT criteria, it must be recommended for consideration. The final decision on noise abatement construction will be determined by WSDOT in conjunction with outreach and input from the affected residences using a voting process.

Frequently, there are areas with noise impacts and no reasonable and feasible noise abatement measures available. The analysis will provide a discussion of these impacts and specifically outline reasons for not including noise abatement.

The analysis will include a detailed discussion as related to local laws applying to construction noise. A construction noise analysis will be included in the noise report. Construction activities that may cause annoyance at nearby noise-sensitive land uses will be qualitatively assessed in accordance with WSDOT's procedures.

A noise technical report summarizing the finding of the noise study will be prepared. The report will follow the WSDOT policy for a traffic noise technical analysis. The contents will include an introduction to acoustics and discuss land use, methodology, existing noise levels, future No- Build and Build noise levels, noise impacts, and recommended noise abatement and a basic construction noise analysis.

Existing and proposed roadway alignments will be provided on vicinity-scaled maps. Traffic noise impacts, monitoring locations, and sensitive receivers will also be shown on area maps at an appropriate scale. Tables, with comparisons, will be prepared to aid in the understanding of existing and future noise levels, project impacts and mitigation. A discussion of potential impacts on future land uses in the context of existing and planned land uses will be provided. Construction noise impacts and local regulations, as described above, will be discussed.

This scope and fee assumes 6 additional 2-hour meetings and discussions regarding noise abatement and noise reducing design options for consideration of construction with the project. Meeting preparation time is also included in the fee.

The initial report will be submitted in Microsoft (MS) Word format for review and comments. After revisions based on the comments are completed, a final report will be produced in PDF electronic format.

Noise Analysis Assumptions:

- CAD files in AutoCAD or MicroStation for the existing roadway alignment and proposed roadway alignment will be provided by the project engineers.

- Traffic data, including turning movements at the intersection of NE 18th Street with: NE 138th Avenue, NE 141st Avenue, NE 162nd Avenue along with NE 148 and NE 15th Avenues if volume warranted evaluation), will be provided by project traffic engineers, and will include peak hour volumes for existing, future No-Build and future Build, with posted speed limits, and percentage of vehicle types (e.g., passenger vehicles, medium trucks, and heavy trucks).

Noise Analysis Deliverables:

- Noise analysis technical report (draft and final)
- Noise monitoring sheets and details
- Noise wall locations and heights (if and where applicable)
- TNM files

Subtask 4.3 Cultural Resources (ASCC)

The project will require archeological approval from the City and shall meet Section 106 of the National Historic Preservation Act of 1966.

- The Consultant will work to ensure compliance with the cultural resource requirements as outlined in the EA & the FONSI for the corridor. Given that the FONSI was signed in 2006, the Consultant expects that additional research and consultation will be necessary to meet current standards for cultural resources review.
- The Consultant will coordinate WSDOT to establish the project's area of potential effects (APE) and methodology for the cultural resource investigation, producing an APE/methodology memo as needed. Given the nature of the project and its urban setting, it is expected that the cultural resource study will be concerned only with the APE for direct effects rather than the APE for indirect (e.g. visual or auditory) effects.
- Once the APE and methodology are established, the Consultant will coordinate with project stakeholders (including WSDOT, the City, the Washington Department of Archaeology and Historic Preservation [DAHP], Native American Tribes, and land managing and permitting agencies) to ensure that all applicable notifications, permissions, laws, and regulations related to the cultural resources study are addressed.
- The Consultant will research the project's environmental, archaeological, ethnographic, and historical context to establish a localized probability model and interpretive context for any cultural resources which may be encountered

during the field investigation. This research will include a thorough review of previous cultural resource studies in the vicinity of the study area.

- The Consultant will undertake a two-phase field investigation consisting of a pedestrian survey and a subsurface survey.
- The pedestrian survey will entail a walkover of the entire study area, the goal being to identify and document any exposed cultural resources which may be directly affected by the proposed project.
- The subsurface survey will sample points along the project area where excavation is permitted by ground conditions, i.e. areas without pavement, buried utilities, or other signs of heavy ground disturbance. The subsurface survey is expected to entail the excavation of up to 40 shovel test probes (STPs), each excavated as a circular hole measuring 45 cm in diameter and at least 50 cm in depth, barring impasse. All excavated sediments will be screened using 1/4-inch and 1/8 inch (6-mm and 3-mm) hardware cloth to recover any archaeological data.
- All identified cultural resources will be inventoried with DAHP and subject to a preliminary assessment of significance, to the extent possible within the current scope of work. The Consultant will make recommendations as to any further study or treatment for each resource identified and for the larger project.

Subtask 4.4 Tree Evaluation/Preservation Process (MHA)

- Locate and evaluate trees measuring at least six inches (6”) in diameter at breast height (DBH). An existing conditions plan shall be generated locating the existing trees by survey point number and trees will be visually assessed by an ISA Board Certified Master Arborist in terms of species, size, condition, and potential for construction impacts. A tree preservation plan shall be prepared by HHPR in collaboration with MHA that identifies protection measures proposed for trees to be retained. A street tree work
- permit application shall be completed, and a liaison established with the City Urban Forester.
- This work is based upon utilizing the proposed alignment, and includes evaluation of potential construction impacts, critical root zone analysis, the design of tree protection measures, or the modification to roadway alignment, slopes, retaining walls, or Right of Way for the protection of healthy trees. This scope includes coordination and drafting of tree protection measures on the roadway grading plans, and location of trees outside the Right of Way adjacent to proposed construction, if necessary.

- Special care will be taken to evaluate all trees individually and as a grove. Creativity in road design will be valued in different approaches to preserve quality mature trees.

Subtask 4.5 Permit Facilitation and Tracking (HHPR)
Monitor progress of the relevant reviewing agencies so that questions or concerns during review are addressed quickly. This will enable the permit application to be processed in a timely manner.

Subtask 4.6 Critical Areas Reporting
The previous wetland delineation and critical area assessment that cover the Project area were completed in 2000 and require verification and updating. HHPR will delineate wetlands and waters within and adjacent to the Project area.

For this task HHPR will:

- Conduct a field visit to evaluate the subject property and the areas within 300 feet for critical areas.
- Flag boundaries of wetlands and streams and map within the Project area with GPS.
- Complete wetland rating forms for any wetlands identified and determine City of Vancouver buffer widths.
- Prepare a Wetland Delineation and Critical Areas Report for City of Vancouver and WSDOT review.
- Coordinate with City of Vancouver during review.

Assumptions:

- HHPR will have safe access to the study area.
- Field work can be completed in two field days by a two-person team.
- HHPR will prepare Critical Area Report exhibits using GIS or AutoCAD.
- City, State, or other agencies will not require additional field work or a site visit.
- No permit is required from the US Army Corps of Engineers, the Washington Department of Ecology, or Washington Department of Fish and Wildlife.

Deliverables:

- Draft Critical Areas Report (one electronic copy)
- Final Critical Areas Report (one electronic copy)

Subtask 4.7 SEPA

HHPR will complete a SEPA Environmental Checklist for the Project. It is anticipated that the City will be SEPA lead agency, and that the agency determination will be a Determination of Non-Significance (DNS).

Assumptions:

- Revisions and comments on the SEPA checklist will be minor and do not require additional technical analysis.
- The SEPA threshold determination is anticipated to be a DNS or Mitigation DNS. A SEPA EIS is not required.
- The City will be the lead agency and will prepare the SEPA threshold determination.

Deliverables:

- Draft SEPA Checklist (one electronic copy)
- Final SEPA Checklist (one electronic copy)

Subtask 4.8 NEPA Categorical Exclusion (Contingency)

The Consultant will complete the NEPA ECS form and compile the NEPA environmental documentation in accordance with Chapter 24 of the LAG Manual and other appropriate WSDOT and/or FHWA guidance documents.

FHWA-funded projects require the local agency to prepare and compile a list of environmental commitments required of the Project. As a consequence, the Consultant will compile and provide the City with a matrix of environmental commitments made through the permitting of the Project.

Assumptions:

- NEPA documentation is assumed to be a PCE, and the preparation of an EA or environmental impact statement (EIS) is not included in this task.
- Document preparation will begin upon the selection of a preferred alternative.
- One round of City revisions and WSDOT comments on the ECS will occur. These will require minor edits and will not require additional technical analysis.
- After final delivery of the matrix of environmental commitments, the City will be responsible for managing and maintaining the matrix, including any subsequent permit updates and will be responsible for providing the register to FHWA if requested.

Deliverables:

- Draft ECS form
- Final ECS form
- Draft matrix of permit commitments
- Final matrix of permit commitments

Subtask 4.9 No Effect Memorandum (Contingency)

The Consultant will confirm which National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) listed species and critical habitat could occur within the Project area. The Consultant will also research and identify listed species and habitat information from the Washington State Department of Fish and Wildlife (WDFW) Priority Habitats and Species Program, the Washington State Department of Natural Resources (WDNR) Washington Natural Heritage Program, and the City and/or County geographic information systems in addition to other existing literature and data resources and field reconnaissance.

The Consultant will complete a field review and verify the presence of potential habitat for listed species in the Project Action Area.

The Consultant will prepare the required documentation for Endangered Species Act (ESA) compliance. Based on the anticipated increase in impervious surfaces and on-site stormwater infiltration a "No Effect" determination is anticipated. A No Effect Memorandum (NEM) will be prepared consistent with WSDOT Local Agency Guidelines (LAG) Manual.

It is expected that the Consultant will meet one time with WSDOT Local Agency staff for this task. This meeting would occur once the preliminary design is completed, including stormwater design, and would be intended to confirm the "No Effect" determination.

Assumptions:

- The only potential Project impacts to ESA-listed species are associated with stormwater runoff reaching ESA-listed fish bearing waters.
- Stormwater can be treated and fully infiltrated onsite, resulting in a "No Effect" determination for ESA.
- Consultation with the agencies is not required.
- Formal species surveys are not necessary and not included in this scope of work.

- WSDOT comments on the draft and final NEM are minor edits and will not require additional technical analysis or field visits.
- The meeting with WSDOT Local Agency staff will be held virtually.

Deliverables:

- Up to one meeting with WSDOT staff to discuss the "No Effect" determination.
- Draft NEM for City review (one electronic copy)
- Final draft NEM for City and WSDOT review (one electronic copy)
- Final NEM submitted to WSDOT (one electronic copy)

Subtask 4.10 Update NEPA EA (Contingency)

If changes to the proposed Project are determined through coordination with relevant agencies that are substantial enough to require a re-evaluation or a supplemental assessment, the Consultant will prepare an updated EA. The Supplemental Assessment or re-evaluation will document the trigger for re-evaluation, describe the changes, focus the scope (clarify the area for re-evaluation), analyze impacts, and identify any required mitigation measures.

The EA will be prepared consistent with the WSDOT Local Agency Guidelines (LAG) Manual. The area of indirect effects studied with the Project will be determined and examined in accordance with the guidance in WSDOT's EA preparation training manual.

It is expected that the Consultant will meet up to two times with WSDOT and BPA agency staff for this task. The first meeting will be to address and reach an agreement on the content of the EA update, and the second meeting will be to review and discuss mitigation measures that would be incorporated into the Project design.

Assumptions:

- Agency comments on the draft and final EA are minor edits and will not require additional technical analysis.
- Meetings with agency staff will be in Vancouver. No formal meeting minutes will be prepared from these meetings.
- Agencies will have one round of comments and updates to report will be minimal

Deliverables:

- Draft EA for City review (one electronic copy)
- Final draft EA (one electronic copy to City and WSDOT)

- Final EA (one electronic copy to City and WSDOT)
- Up to two meetings with WSDOT staff to discuss the content of the EA and to discuss proposed Project mitigation

Subtask 4.11 Update BA (Contingency)
If a stormwater design utilizing 100% infiltration is not feasible, or if other unavoidable impacts negate a "No Effect" determination, the Consultant will prepare a biological assessment (BA). The BA will be prepared consistent with the WSDOT Local Agency Guidelines (LAG) Manual. The area of indirect effects studied with the Project will be determined and examined in accordance with the guidance in WSDOT's BA preparation training manual.

It is expected that the Consultant will meet up to two times with WSDOT agency staff for this task. The first meeting will be to address and reach an agreement on the content of the BA, and the second meeting will be to review and discuss mitigation measures that would be incorporated into the Project design.

Assumptions:
- After coordination with relevant agencies, it is determined that the previous ESA coverage can be updated and amended.
- Formal species surveys are not necessary and not included in this scope of work.
- Agency comments on the draft and final BA are minor edits and will not require additional technical analysis.
- Meetings with agency staff will be in Vancouver. No formal meeting minutes will be prepared from these meetings.
- Up to two meetings with WSDOT staff to discuss the content of the BA and to discuss proposed Project mitigation
- Agencies will have one round of comments and updates to report will be minimal

Deliverables:
- Draft BA for City review (one electronic copy)
- Final draft BA (one electronic copy to City and WSDOT)
- Final BA (one electronic copy to City and WSDOT)

Subtask 4.12 Mitigation Plan

- If the final design impacts buffers of designated critical areas, including wetlands, streams, and protected wildlife habitat, buffer mitigation will be required.
- For this task HHPR will:
- Prepare a mitigation plan to address Project impacts at an appropriate mitigation site provided by the City.
- Attend up to one pre-application meetings and one field visit with the City.

Assumptions:

- Wetland and stream impacts not included in this Project.
- Buffer mitigation will consist of vegetation enhancement on a City owned property.
- City revisions and comments will be minor and do not require additional technical analysis.
- Delineation of the mitigation site not included in this task.

Deliverables:

- Draft Critical Areas Mitigation Plan (one electronic copy)
- Final Critical Areas Mitigation Plan (one electronic copy)

Subtask 4.13 JARPA (Contingency)

- Any proposed impacts to wetlands and waterways will require a permit from USACE and/or the Washington State Department of Ecology (DOE), as well as from the City of Vancouver.
- For this task HHPR will prepare a JARPA Form and required exhibits for impacts to Waters of the US and Waters of the State Attend up to two pre-application meetings and up to two field visits with USACE, Ecology, and City biologists. HHPR will be available to answer questions from USACE, Ecology, and the City throughout review and permit issuance. HHPR will prepare a bank use plan to DOE for approval to purchase credits at the Terrace Mitigation Bank.

Assumptions:

- No impacts below the Ordinary High Water Mark of fish bearing streams.
- No HPA required from WDFW.
- Wetland and buffer impacts will be addressed using mitigation bank credit
- Mitigation for other critical areas not included in this task.
- The analysis will be based on the 60% design or equivalent.

- Any post-60% design changes will not change impacts or analysis or require revisions.
- City will obtain signatures of surrounding property owners, if requested by agencies.
- City will submit documents and coordinate with USACE and Ecology.

Deliverables:

- Draft JARPA (form and exhibits)
- Final JARPA (form and exhibits)
- Draft Bank Use Plan (one electronic copy)
- Final Bank Use Plan (one electronic copy)

Task 4 Deliverables

- Memorandum summarizing relevant previous environmental studies
- Update to NEPA CE, if required
- NPDES Permit Application and SWPPP
- Update to Noise impact report
- Update to BA, if required
- SEPA Checklist
- Tree Preservation Plan, Tree Inventory Data, and Tree Protection Specifications
- City Critical Area Ordinance Permit

TASK 5: PUBLIC INVOLVEMENT AND AGENCY COORDINATION (PN)

Subtask 5.1 Project Management & Contract Administration

Contract Administration, Invoicing, Scheduling & Progress Reporting

- The Consultant shall prepare and submit monthly invoices accompanied by brief project progress reports. Each invoice will include date period covered by invoice; number of hours worked during the billing period with billing rates shown; expenses and associated mark-ups; total cost for labor and expenses for the billing period; subconsultants fees including markups for the billing period; and a total amount summarizing labor, expenses, and fees.
- The Consultant shall maintain all contract-required documentation. Provide copies of project files and records to the CITY for audits and public information requests. All final documents shall be provided in electronic format as requested.
- The Consultant shall prepare and submit an activities list for Public Involvement related activities/key deliverables and schedule. The schedule shall show key

communications and public involvement milestones that support the all-up project.

Discovery & Project Team Meetings
The Consultant review all project discovery (history, current conditions, alternative analysis, design guidelines/policies, City documentation, demographic data) and shall support and participate meetings necessary to successfully complete the project. Including:

- All-up project kickoff meeting with City Staff and Consultant team.
- One Engagement and Comms kickoff meeting with a subset of the project team.
- Bi-weekly internal consultant team meetings and project coordination.
- Participate in monthly project coordination meeting with City staff (assumed 24 months total)
- Attend meetings with Consultant team and City staff after the review of the 30%, 60%, 90%, and Final plan submittals.
- The Consultant shall input relevant public involvement items for meeting agendas. This includes a Project kick-off meeting, monthly progress meetings, review meetings and coordination meetings.

Project Management & Coordination

- The Consultant shall prepare for Project meetings with key Project team members, as well as representatives from the City of Vancouver and other agencies as needed. These meetings shall have specific agendas addressing and resolving Project issues as they are encountered. Consultant shall prepare meeting recap with actions and decisions made related to Communications and Engagement work.
- The Consultant shall coordinate Consultant tasks and activities with the City. This shall include using monthly meetings to plan and coordinate upcoming activities.

Subtask 5.2 Public Engagement Plan & Management
The Consultant shall coordinate and assist the City in the development of a Public Involvement and Agency Coordination Program for the Project. The Consultant shall meet with the City's Project Manager, Community Relations Specialist as well as other project team members to review and refine the overall public involvement strategy—the Public Engagement Plan—and to agree on roles and responsibilities, goals, outcomes, timeline, communications and activities.

Additionally, the consultant team will gather input and feedback on the engagement plan with a small group of community champions from the 18th Street Coalition via one small group session hosted in-person at a convenient location for Coalition members. A virtual option will also be made available to attend the meeting.

The purpose of the Public Involvement Program includes the following:

- To develop an environment of trust between the City and citizens who are directly and indirectly affected by the Project
- Coordination with the NE 18th Street Coalition will be incorporated into our public involvement – from the beginning of the project including the development of the engagement plan.
- To give citizens timely opportunities to comment upon various aspects of the Project as the work progresses
- To provide information about public attitudes and issues related to the Project
- To facilitate public meetings and provide logical and easily understood information to the public
- To define and implement an ongoing public information program directed toward an outreach effort which will answer questions and provide a direct link between the community and the technical data created by the consulting team

The following Neighborhood Associations are located along the project corridor:

- Burton Evergreen
- Landover Sharmel
- North Garrison Heights
- Fircrest
- North Hearthwood
- Emerald Landing
- First Place
- Cimarron
- Countryside Woods

Subtask 5.3 Communication & Outreach Material Development

Also included in the process will be the dissemination of project information to the general public, businesses, neighborhood groups, partners and community champions. The consultant will also work with the City to write, design and distribute material to promote engagement events and opportunities to speak directly to the project team. Public information and promotional material may include a mix of:

- Community mailings corresponding to and notifying the community of outreach events.
- A comment form shall be included with each mailing and/or be provided at engagement events.
- A final mailing shall give information to the public regarding the outcome of engagement events and shall include the anticipated final design and construction schedule.
- Press releases for the Project.
- Project fact sheet(s) and/or project area signage.
- The open houses and community engagement activities shall be well-publicized through City-owned channels, including news releases, social media, the project website, newsletters signage or flyers.

Web Page and Electronic Communications: The Consultant shall provide Project information to the City (using the City's format) for a Project web page linked to the City's website. The Project specific page will include the Project schedule, process steps, committee information, issues gathered and information about the design as it develops. This site will be updateds throughout the design process, keeping the public informed as the project progresses through key design milestones. The consultant will provide content for the City to publish on the website.

Subtask 5.4 Engagement Activities & Coordination

Interested and potentially impacted parties as well as the broader Vancouver community will be invited to participate in the preliminary design and the environmental evaluation process.

Project Advisory Group

- In close collaboration with the City, the consultant will support the recruitment, set up, communications with and management of a project advisory group.
- The group shall meet throughout the design phase of the project in advance of key design milestones.

Public Outreach Events

- Arrange and facilitate up to three (3) Project open houses. These meetings shall follow the format of an open house and shall be held in the Project area in order to foster a partnership approach and to enhance Project credibility. The first open house shall be held at the beginning of the preliminary design process. The purpose of the first open house will be to introduce the Project to the public,

listen to concerns and gather information relative to issues which need to be addressed.
    - The second open house may be held at the 60% design completion. The purpose of the second open house will be to present and discuss the proposed alignment and design choices and to receive public feedback.
    - The third open house may be held at completion of the design. The purpose of the third and final open house will be to present the proposed design, answer questions about the design, environmental impacts and proposed mitigation and other matters of interest to citizens.
- Identify and execute a mix of in-person or virtual opportunities to engage with the community and increase project awareness. These activities include:
    - Small group meetings/briefings to provide project updates
    - Project area canvassing
    - 1:1 meetings / interviews

Task 5 Deliverables

- Public Engagement input on project design schedule & schedule updates
- Draft and final Public Engagement Plan
- List of Interested & Potentially Impacted Parties
- Preparation, facilitation, and attendance of up to two consultant public engagement specialists at public outreach activities and events
- Day-of event materials such as sign-in sheets, presentation, displays/engagement posters and comment forms as needed (one electronic copy plus hard copies for the meeting)
- Fact Sheets / Notices
- Meeting Minutes
- Newsletter Insert
- Social Media Content and Supporting Visuals
- Press Releases
- Web Page Messaging, Supporting Visuals and Updates
- Draft and final public engagement reports (up to three) at key project milestones

Task 5 Assumptions

- Public engagement services listed in this scope of work covers anticipated work through project design and does not include construction coordination services.
- Assumes 24 months of active work and a contingency for an additional six months.

- All deliverables assume one round of review by the City.
- Task 5.1 Assumes participation and prep for one project kickoff meeting
- Task 5.1 assumes monthly City and consultant team meetings + prep material and comms
- Task 5.1 Assumes bi-weekly consultants-only team meetings + prep material and comms
- Task 5.1 Assumes Consultant will have two public involvement staff at project meetings identified for this task
- Task 5.2 Assumes the City will provide any additional available information regarding minority and low-income communities, and any known stakeholders or partners that should be engaged in the outreach process
- Task 5.3 Assumes the City Public Works Communications will respond to all media inquiries and serve as the public information officer for this project
- Task 5.3 Assumes the City Communication Relation Staff (CRS) will distribute press releases
- Task 5.3 Assumes the consultant will provide print-ready digital file of all communications and outreach material to the City, and the City will handle all printing and distribution
- Task 5.3 Assumes the City will accept and respond to all media requests
- Task 5.3 Assumes all communications to be approved by City Public Works Communications
- Task 5.3 Assumes up to three press releases
- Task 5.3 Assumes Consultant will provide messaging and supporting visuals and the City will create, maintain and host the website with its own web-hosting capabilities
- Task 5.4 Assumes the City will staff all potential tabling events
- Task 5.4 Assumes the Consultant will identify and secure an appropriate venue (location) for the open houses/in-person activities. Venue fees, if any, will be paid and approved by the City.
- Task 5.4 Assumes The City will provide key staff to attend the open houses.
- Task 5.4 Assumes alternative language contact number(s) for inclusion in promotional material to be provided by the City.
- Task 5.4 Assumes catering coordination and costs to be covered by the City.

TASK 6: DESIGN ENGINEERING SERVICES DURING CONSTRUCTION

Note this Project does not have construction funding at this time therefore Task 6 services will be scoped but may not be used due to funding constraints. If the City

receives funding for this project these services will be added to the contract via an amendment.

The Consultant during the construction of the Project shall provide limited bidding and engineering services. The anticipated construction engineering services are described as follows:

Pre-Bid Opening Responsibilities: The Consultant shall respond to questions from prospective bidders and city staff before bid opening in reference to the bid package.

Preconstruction Conference: The City will provide notification of the preconstruction conference, provide location for the meeting, lead the preconstruction conference and prepare meeting minutes. The Consultant shall attend and participate in the preconstruction conference.

Construction Contract Administration: The Consultant shall provide limited administration of the contract during construction of the Project that may include:

- Assisting the City by acting as a liaison with the Consultant, design team, appropriate agencies, property owners and utility franchises.
- Participating in Project meetings. Assume (6) meetings.
- Responding to Requests for Information (RFIs), plan interpretation and/or changes.
- Assisting the City in the preparation, negotiation and settlement of change orders.

Review Submittals: The Consultant shall review submittals that may include shop drawings, samples, traffic control plans, test reports and other data submitted by the Construction Consultant for compliance with the information required by the contract documents.

Monitor Permit Requirements: The Consultant shall monitor permitting issues during construction, which are impacted by the evolving situation with the new listings of threatened and endangered species and designated critical habitat within the Project area. The BA's prepared for the Project includes evaluations of both proposed critical habitat and candidate species. These listing and designation issues may be resolved creating changes in Project affects. In addition, over the course of the construction it is necessary to ensure that no new proposed listings have occurred for species within the Project area. This includes monitoring and identifying permitting changes during construction and does not cover the potential permitting needs associated with

modification of design implementation through changes in impact areas or construction timing.

Task 6 Deliverables

- Answer pre-bid questions
- Attend preconstruction conference
- Provide limited construction contract administration
- Review construction contract submittals
- Monitor permit requirements

CITY DELIVERABLE TO THE CONSULTANT

Sample Projects: The City will provide copies of sample City Projects, environmental documentation, and design guidelines. The City will also provide electronic files of title blocks, ortho and aerial drawings and standard details for streets, traffic signal, street lighting and other available details.

Project Coordination: The City will assist the Consultant in managing relationships with other jurisdictions involved in the Project, adjacent property owners and the public. The City will provide staff to meet and discuss the Project with the Consultant as needed. The City will provide written comments pertaining to the design submittals.

Survey Work and Preliminary plans: The City will provide survey data, digital terrain modeling and alignment information to the Consultant in AutoCAD format. The City will provide the Consultant with a preliminary design for the Project.

Right of Way (ROW)

- The City will prepare ROW plans, exhibits and legal descriptions.
- The City will acquire all ROW and easements necessary for the construction of the Project.

Right of Entry Permits: The City will obtain the right of access to private parcels for all Project developments. The Consultant shall coordinate access.

Pavement Design: The City will select the pavement type and structural sections based on the pavement recommendation provided by the Consultant.

Utility List: The City will provide the Consultant with a list of local contacts for utilities within the Project limits. Design and plan preparation for the addition or relocation of utilities within the Project limits will be done by others.

Water and Sewer Design: The City will provide information regarding the size and materials for the consultant to design water and sewer plans and specifications.

Street Light and Traffic Signal Requirements: The City will provide the illumination type, the minimum illumination levels and uniformity ratios to be used in the Project design. The City will also provide traffic signal design concepts, standards, and policies, including traffic interconnect schemes, as needed.

City Deliverables

- Sample projects
- Project Coordination
- Survey work and preliminary plans
- Right of Way plans, exhibits and legal descriptions
- Right of Entry Permits
- Pavement type & structural sections selection
- Utility List
- Water and Sewer Design
- Street light and Traffic Signal Requirements

Exhibit B
Fee Schedule

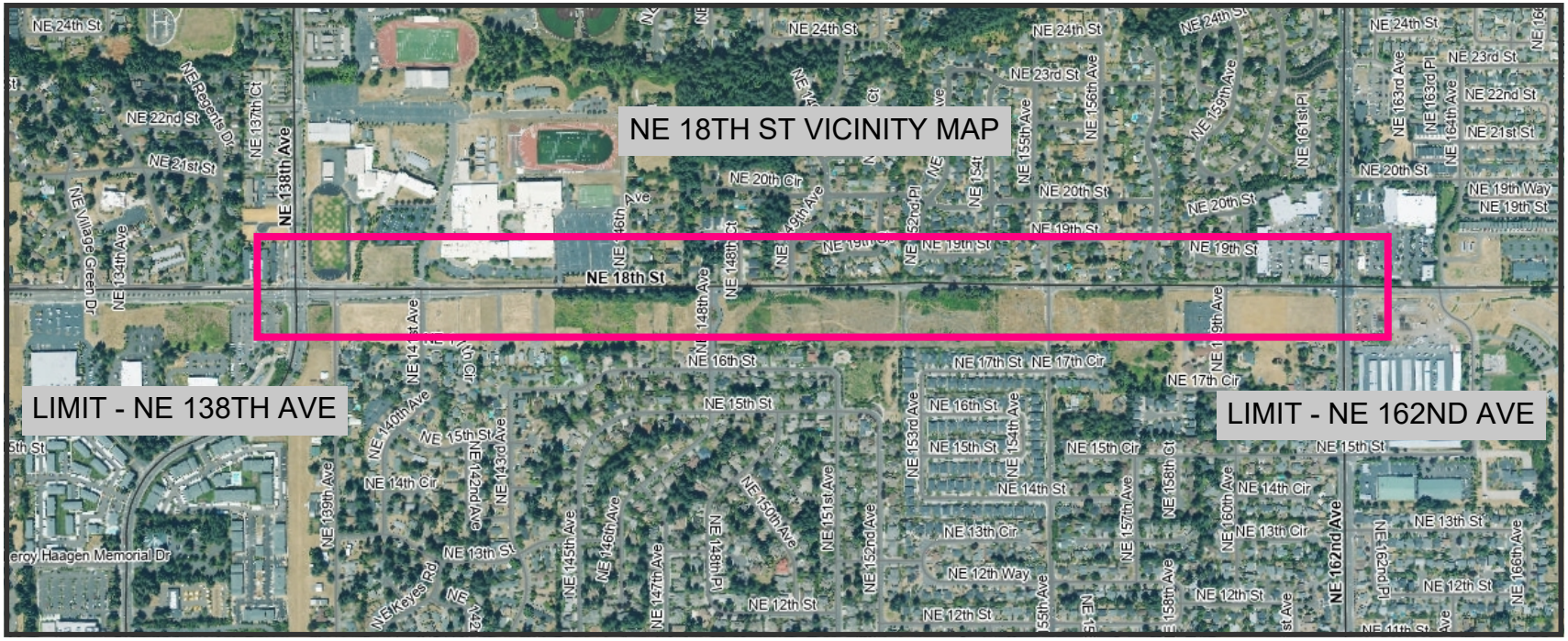
Harper Houf Peterson Righellis Inc.
NE 18th Street Corridor Improvements
NE 138th Avenue to NE 162nd Avenue

	HHPR																				GTE										Columbia West							Point North							Archaeological Services							Michael Minor				Morgan Holen		
	Project Manager	Project Engineer	Civil Engineer	Senior Civil Designer	Civil Designer	CAD Technician	Quality Control Engineer	Structural Manager	Structural Engineer	Structural Designer	Senior Scientist	Scientist	Natural Resources Technician	Project Surveyor	Survey Technician	Planner	Project Assistant	Landscape Architect	Clerical	Expenses	Principal/Sr. Project Manager 6	Sr Project Engineer 5	Sr. Engineering Associate 2	Engineering Associate 6	Engineering Associate 4	Engineering Associate 1	Tech 2 CAD Support	Tech 1 CAD Support	Admin Assistant	Expenses	Principal Engineer	Project Engineer	Staff Engineer	Laboratory Manager	Senior Technical Editor	Administrative Assistant	Expenses	Principal	Director	Manager	Coordinator	Multimedia Designer	Accounting Manager	Expenses	Archaeological Technician 1	Archaeological Technician 2	Archaeological Technician 3	Office Coordinator	Principal Investigator	Professional Archaeologist	Expenses	Principal	Noise - Air Analyst	Field Analyst	Expenses	Consulting Arborist	Expenses	Grand Total by Task
Tasks																																																									
Task 1.0 Project Management & Administration (HHPR)																																																							
Task 1.1 Contract Administration, Invoicing, Scheduling & Progress Reporting	286	182																	78																																				$ 114,750.00
Task 1.2 Meetings	273	273	68	68	68			24			60	20		24			24	68																																				$ 182,257.00
Task 2.0 Traffic Engineering - Traffic Analysis (GTE)																																																						
Task 2.1 Traffic Engineering Project Management																																																						
Task 2.1.1 Project Coordination & Meetings																					95			16				24	$ 100.00																											$ 21,531.00
Task 2.1.2 Public Involvement																					60								$ 100.00																											$ 11,240.00
Task 2.2 Traffic Analysis Report																																																					
Task 2.2.1 Existing Transportation Facilities & Traffic Conditions																					10		6		32				$ 5,360.00																											$ 10,537.00
Task 2.2.2 Future Traffic Conditions																					30				85																															$ 12,663.00
Task 2.2.3a Access Management Plan (HHPR)	20	88	40	12	32	12	4									16																																							$ 37,461.00
Task 2.2.3b Access Management Plan (GTE)																					30				40																															$ 8,908.00
Task 2.2.4 Traffic Analysis Report																					30		6		30																															$ 8,724.00
Task 3.0 Design Engineering - PS&E; Alignment Options inc. Signals Vs. Roundabouts																																																						
Task 3.1 Design																																																						
Task 3.1.1a 30% Design (Preliminary) (HHPR)	288	676	284	324	576	276	52	0	0	0	0	0	0	0	0	0	0	0	60	$ -																																				**$ 412,113.00**
Task 3.1.1b 30% Design (Preliminary) (GTE)																					110	16	70	140	30	150	85	85																													$ 68,722.00
Task 3.1.2a 60% Design (PS&E) (HHPR)	102	336	184	256	374	240	28	8	0	0	0	4	0	0	0	0	16	8	0	$ -																																				**$ 240,441.00**
Task 3.1.2b 60% Design (PS&E) (GTE)																					120	16	90	150	50	350	120	120																													$ 95,390.00
Task 3.1.3a 90% Design (PS&E) (HHPR)	61	306	156	192	332	128	23	4	0	0	0	4	0	0	0	0	8	4	0	$ -																																				**$ 188,984.00**
Task 3.1.3b 90% Design (PS&E) (GTE)																					120	16	90	150	40	350	120	120																													$ 94,555.00
Task 3.1.4a Final Design (PS&E) (HHPR)	49	172	96	109	228	94	19	2	0	0	0	2	0	0	0	0	4	2	0	$ -																																				**$ 120,383.00**
Task 3.1.4b Final Design (PS&E) (GTE)																					30	16	20	40	10	70	30	20																													$ 23,823.00
Task 3.2 Site Investigation, Utility Data Collection & Coordination (HHPR)																																																						
Task 3.2.1 Site Investigation (HHPR)	8	16			32	8	2																																															$ 10,576.00
Task 3.2.2 Utility Coordination (HHPR)	16	56																	8																																				$ 15,531.00
Task 3.2.3 Utility Meetings (HHPR)	20	24			12																																																$ 11,179.00
Task 3.2.4 Conflict Identification, Analysis & Recommended Resolution (HHPR)	20	64	32		72	8	1																																														$ 31,949.00
Task 3.2.5 Conflict Notification & Utility Relocations (HHPR)	16	64	32																8																																				$ 21,388.00
Task 3.3 Geotechnical Engineering (CW)																																	28	8	97	4	6	8	$ 55,830.00																				$ 76,041.00
Task 3.4 Structural Engineering (HHPR)	16	56	16	56	90	72	7	28	104	104	0	0	0	0	0	0	0	0	0	$ -																																				**$ 81,561.00**
Task 3.5 Landscape Architecture (HHPR)																		296																																						$ 38,945.00
Task 3.6 Right-of-Way Plans (HHPR)	20	72	8	8	120	40	4																																														$ 41,985.00
Task 3.7 Grade Sheets (HHPR)	8	16			40			4						40	160																																								$ 39,255.00
Task 4.0 Environmental Evaluation & Permitting (HHPR)																																																							
Task 4.1 Review of Previous Environmental Studies (HHPR)											30	62																																											$ 12,733.00
Task 4.2 Noise Analysis (MMA)																																																						$ 29,049.00
Task 4.3 Cultural Resources (ASCC)																																																						$ 25,944.00
Task 4.4 Tree Evaluation/Preservation Process (MH)																																																						$ 28,430.00
Task 4.5 Permit Facilitation and Tracking (HHPR)	2										6	24																																										$ 4,565.00
Task 4.6 Critical Areas Reporting (HHPR)	2										50	126								$ 64.00																																		$ 24,745.00
Task 4.7 SEPA (HHPR)			2								10	35																																										$ 6,382.00
Task 4.12 Mitigation Plan (HHPR)											31	62						12		$ 32.00																																		$ 14,499.00
Task 5.0 Public Involvement & Agency Coordination (PN)																																																						
Task 5.1 Project Management & Contract Administration																																				315	391	70	0	54																$ 145,735.00
Task 5.2 Public Engagement Plan & Management																																				88	127	25	0	0																$ 42,014.00
Task 5.3 Communication & Outreach Material Development																																				111	379	30	200	0	$ 2,000.00																$ 110,352.00
Task 5.4 Engagement Activities & Coordination																																				346	654	150	190	0	$ 3,000.00																$ 219,275.00
Task 5.5 Engagement Reports & Milestone Meetings																																				70	167	30	15	0																$ 46,019.00
Task 6.0 Design Engineering Services During Construction																																																						
Task 6.1 Construction Services (HHPR)																																																					$ -
Task 6.2 Construction Services (GTE)																																																					$ -
Hours/Expense Subtotals	1207	2401	918	1025	1976	878	140	70	104	104	187	339	0	64	160	16	52	390	154	$ 96.00	635	64	282	496	317	920	355	345	24	$ 5,560.00	28	8	97	4	6	8	$ 55,830.00	0	930	1718	305	405	54	$ 5,000.00	41	41	140	2	11	8	$ 84.00	72	120	32	0	152	$ 310.00	$ 2,730,634.00
Subtotals by Consultant																				$ 1,651,680.28									$ 356,091.53							$ 76,040.68						$ 563,394.94						$ 25,944.43				$ 29,048.81		$ 28,430.00	
Total - Non Contingency Tasks																				**$ 1,651,680.28**									**$ 356,091.53**							**$ 76,040.68**						**$ 563,394.94**						**$ 25,944.43**				**$ 29,048.81**		**$ 28,430.00**	**$ 2,730,630.67**
Contingency Tasks																																																						
Task 4.8 NEPA Categorical Exclusion (Contingency)											28	72																																											$ 13,725.00
Task 4.9 No Effect Memorandum (Contingency)											20	70																																											$ 12,224.00
Task 4.10 Update NEPA EA (Contingency)											50	120																																											$ 23,393.00
Task 4.11 Update BA (Contingency)											40	135																																											$ 23,796.00
Task 4.13 JARPA (Contingency)						24					16	64								$ 64.00																																			$ 13,699.00
Hours/Expense Subtotals - Contingency Tasks	0	0	0	0	0	24	0	0	0	0	154	461	0	0	0	0	0	0	0	$ 64.00	0	0	0	0	0	0	0	0	0	$ -	0	0	0	0	0	0	$ -	0	0	0	0	0	0	$ -	0	0	0	0	0	0	$ -	0	0	0	$ -	0	$ -	$ 86,837.00
Subtotals by Consultant																				$ 86,835.85									$ -							$ -						$ -						$ -				$ -		$ -	
Total - Contingency Tasks																				**$ 86,835.85**									**$ -**							**$ -**						**$ -**						**$ -**				**$ -**		**$ -**	**$ 86,835.85**
Estimated Project Hourly Rate	$253.37	$191.24	$135.23	$146.50	$126.81	$117.23	$246.93	$167.37	$163.04	$118.85	$155.16	$130.29	$101.05	$167.05	$135.14	$121.56	$145.35	$131.57	$95.90		$185.66	$185.66	$158.37	$99.72	$93.45	$77.69	$85.97	$83.74	$88.22		$246.45	$175.51	$134.05	$177.27	$158.94	$158.94		$322.19	$233.13	$146.08	$117.87	$117.87	$129.35		$80.59	$90.62	$112.11	$71.86	$133.18	$118.53		$201.81	$96.30	$92.59		$185.00		
NOTE: Actual Bill Rates will be calculated based on the Overhead/FCCM Rate Profit Schedule shown in the contract																																																						
Total Including Contingencies																				**$ 1,738,516.13**									**$ 356,091.53**							**$ 76,040.68**						**$ 563,394.94**						**$ 25,944.43**				**$ 29,048.81**		**$ 28,430.00**	**$ 2,817,466.52**

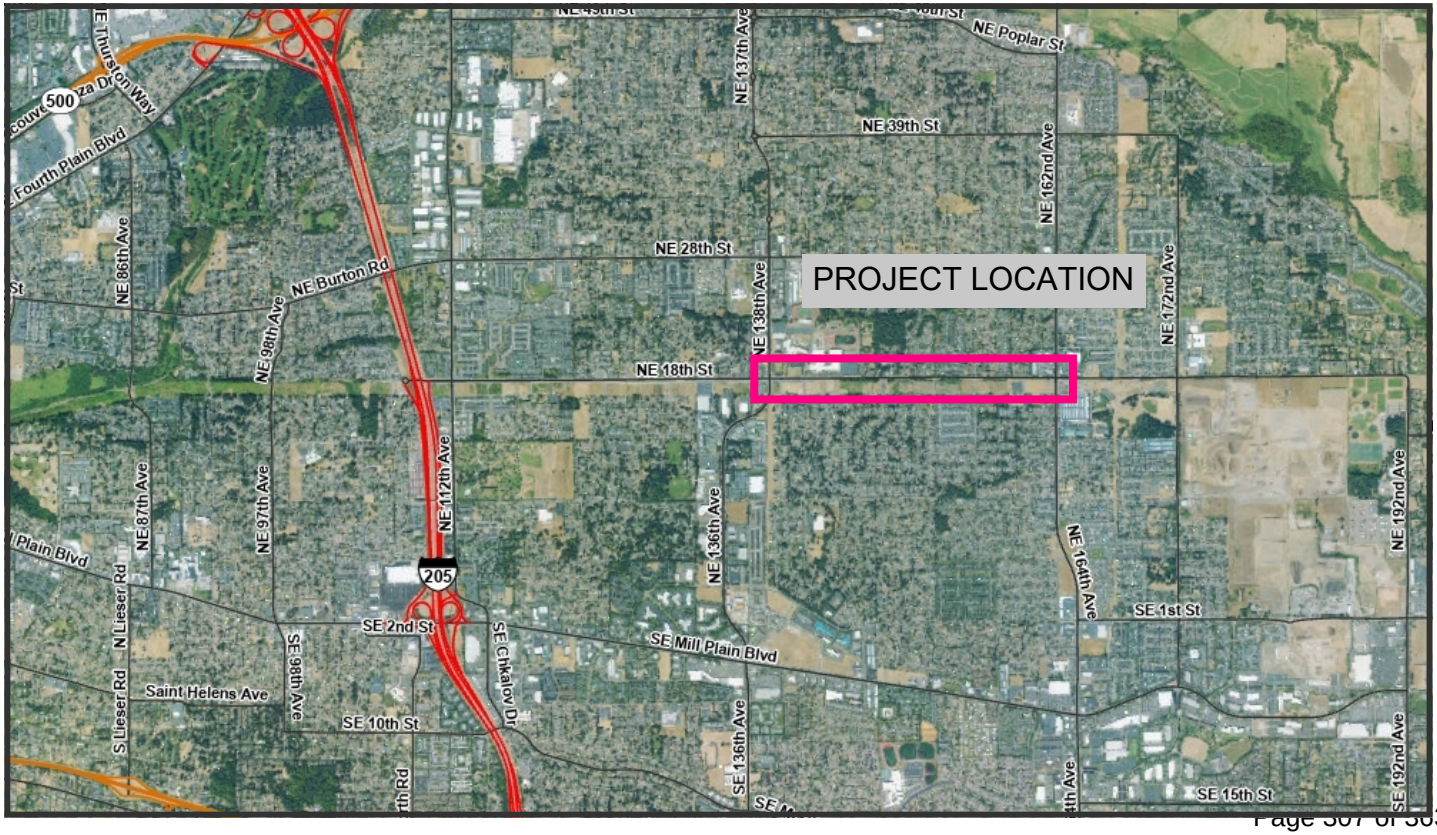
Exhibit B
Fee Schedule

Harper Houf Peterson Righellis Inc.
NE 18th Street Corridor Improvements
NE 138th Avenue to NE 162nd Avenue

	HHPR																				GTE										Columbia West							Point North							Archaeological Services							Michael Minor				Morgan Holen		
	Project Manager	Project Engineer	Civil Engineer	Senior Civil Designer	Civil Designer	CAD Technician	Quality Control Engineer	Structural Manager	Structural Engineer	Structural Designer	Senior Scientist	Scientist	Natural Resources Technician	Project Surveyor	Survey Technician	Planner	Project Assistant	Landscape Architect	Clerical	Expenses	Principal/Sr. Project Manager 6	Sr Project Engineer 5	Sr. Engineering Associate 2	Engineering Associate 6	Engineering Associate 4	Engineering Associate 1	Tech 2 CAD Support	Tech 1 CAD Support	Admin Assistant	Expenses	Principal Engineer	Project Engineer	Staff Engineer	Laboratory Manager	Senior Technical Editor	Administrative Assistant	Expenses	Principal	Director	Manager	Coordinator	Multimedia Designer	Accounting Manager	Expenses	Archaeological Technician 1	Archaeological Technician 2	Archaeological Technician 3	Office Coordinator	Principal Investigator	Professional Archaeologist	Expenses	Principal	Noise - Air Analyst	Field Analyst	Expenses	Consulting Arborist	Expenses	Grand Total by Task
Tasks																																																									
Task 1.0 Project Management & Administration (HHPR)																																																							
Task 1.1 Contract Administration, Invoicing, Scheduling & Progress Reporting	286	182																	78																																				$ 114,750.00
Task 1.2 Meetings	273	273	68	68	68			24			60	20		24			24	68																																				$ 182,257.00
Task 2.0 Traffic Engineering - Traffic Analysis (GTE)																																																						
Task 2.1 Traffic Engineering Project Management																																																						
Task 2.1.1 Project Coordination & Meetings																					95			16				24	$ 100.00																											$ 21,531.00
Task 2.1.2 Public Involvement																					60								$ 100.00																											$ 11,240.00
Task 2.2 Traffic Analysis Report																																																					
Task 2.2.1 Existing Transportation Facilities & Traffic Conditions																					10		6		32				$ 5,360.00																											$ 10,537.00
Task 2.2.2 Future Traffic Conditions																					30				85																															$ 12,663.00
Task 2.2.3a Access Management Plan (HHPR)	20	88	40	12	32	12	4									16																																							$ 37,461.00
Task 2.2.3b Access Management Plan (GTE)																					30				40																															$ 8,908.00
Task 2.2.4 Traffic Analysis Report																					30		6		30																															$ 8,724.00
Task 3.0 Design Engineering - PS&E; Alignment Options inc. Signals Vs. Roundabouts																																																						
Task 3.1 Design																																																						
Task 3.1.1a 30% Design (Preliminary) (HHPR)	288	676	284	324	576	276	52	0	0	0	0	0	0	0	0	0	0	0	60	$ -																																				**$ 412,113.00**
Task 3.1.1b 30% Design (Preliminary) (GTE)																					110	16	70	140	30	150	85	85																													$ 68,722.00
Task 3.1.2a 60% Design (PS&E) (HHPR)	102	336	184	256	374	240	28	8	0	0	0	4	0	0	0	0	16	8	0	$ -																																				**$ 240,441.00**
Task 3.1.2b 60% Design (PS&E) (GTE)																					120	16	90	150	50	350	120	120																													$ 95,390.00
Task 3.1.3a 90% Design (PS&E) (HHPR)	61	306	156	192	332	128	23	4	0	0	0	4	0	0	0	0	8	4	0	$ -																																				**$ 188,984.00**
Task 3.1.3b 90% Design (PS&E) (GTE)																					120	16	90	150	40	350	120	120																													$ 94,555.00
Task 3.1.4a Final Design (PS&E) (HHPR)	49	172	96	109	228	94	19	2	0	0	0	2	0	0	0	0	4	2	0	$ -																																				**$ 120,383.00**
Task 3.1.4b Final Design (PS&E) (GTE)																					30	16	20	40	10	70	30	20																													$ 23,823.00
Task 3.2 Site Investigation, Utility Data Collection & Coordination (HHPR)																																																						
Task 3.2.1 Site Investigation (HHPR)	8	16			32	8	2																																															$ 10,576.00
Task 3.2.2 Utility Coordination (HHPR)	16	56																	8																																				$ 15,531.00
Task 3.2.3 Utility Meetings (HHPR)	20	24			12																																																$ 11,179.00
Task 3.2.4 Conflict Identification, Analysis & Recommended Resolution (HHPR)	20	64	32		72	8	1																																														$ 31,949.00
Task 3.2.5 Conflict Notification & Utility Relocations (HHPR)	16	64	32																8																																				$ 21,388.00
Task 3.3 Geotechnical Engineering (CW)																																	28	8	97	4	6	8	$ 55,830.00																				$ 76,041.00
Task 3.4 Structural Engineering (HHPR)	16	56	16	56	90	72	7	28	104	104	0	0	0	0	0	0	0	0	0	$ -																																				**$ 81,561.00**
Task 3.5 Landscape Architecture (HHPR)																		296																																						$ 38,945.00
Task 3.6 Right-of-Way Plans (HHPR)	20	72	8	8	120	40	4																																														$ 41,985.00
Task 3.7 Grade Sheets (HHPR)	8	16			40			4						40	160																																								$ 39,255.00
Task 4.0 Environmental Evaluation & Permitting (HHPR)																																																							
Task 4.1 Review of Previous Environmental Studies (HHPR)											30	62																																											$ 12,733.00
Task 4.2 Noise Analysis (MMA)																																																							$ 29,049.00
Task 4.3 Cultural Resources (ASCC)																																																							$ 25,944.00
Task 4.4 Tree Evaluation/Preservation Process (MH)																																																							$ 28,430.00
Task 4.5 Permit Facilitation and Tracking (HHPR)	2										6	24																																											$ 4,565.00
Task 4.6 Critical Areas Reporting (HHPR)	2										50	126								$ 64.00																																			$ 24,745.00
Task 4.7 SEPA (HHPR)			2								10	35																																										$ 6,382.00
Task 4.12 Mitigation Plan (HHPR)											31	62						12		$ 32.00																																			$ 14,499.00
Task 5.0 Public Involvement & Agency Coordination (PN)																																																						
Task 5.1 Project Management & Contract Administration																																				315	391	70	0	54																$ 145,735.00
Task 5.2 Public Engagement Plan & Management																																				88	127	25	0	0																$ 42,014.00
Task 5.3 Communication & Outreach Material Development																																				111	379	30	200	0	$ 2,000.00																$ 110,352.00
Task 5.4 Engagement Activities & Coordination																																				346	654	150	190	0	$ 3,000.00																$ 219,275.00
Task 5.5 Engagement Reports & Milestone Meetings																																				70	167	30	15	0																$ 46,019.00
Task 6.0 Design Engineering Services During Construction																																																						
Task 6.1 Construction Services (HHPR)																																																					$ -
Task 6.2 Construction Services (GTE)																																																					$ -
Hours/Expense Subtotals	1207	2401	918	1025	1976	878	140	70	104	104	187	339	0	64	160	16	52	390	154	$ 96.00	635	64	282	496	317	920	355	345	24	$ 5,560.00	28	8	97	4	6	8	$ 55,830.00	0	930	1718	305	405	54	$ 5,000.00	41	41	140	2	11	8	$ 84.00	72	120	32	0	152	$ 310.00	$ 2,730,634.00
Subtotals by Consultant																				$ 1,651,680.28									$ 356,091.53							$ 76,040.68							$ 563,394.94							$ 25,944.43			$ 29,048.81		$ 28,430.00	
Total - Non Contingency Tasks																				**$ 1,651,680.28**									$ 356,091.53							$ 76,040.68							$ 563,394.94							$ 25,944.43			$ 29,048.81		$ 28,430.00	$ 2,730,630.67
Contingency Tasks																																																							
Task 4.8 NEPA Categorical Exclusion (Contingency)											28	72																																												$ 13,725.00
Task 4.9 No Effect Memorandum (Contingency)											20	70																																												$ 12,224.00
Task 4.10 Update NEPA EA (Contingency)											50	120																																												$ 23,393.00
Task 4.11 Update BA (Contingency)											40	135																																												$ 23,796.00
Task 4.13 JARPA (Contingency)						24					16	64								$ 64.00																																			$ 13,699.00
Hours/Expense Subtotals - Contingency Tasks	0	0	0	0	0	24	0	0	0	0	154	461	0	0	0	0	0	0	0	$ 64.00	0	0	0	0	0	0	0	0	0	$ -	0	0	0	0	0	0	$ -	0	0	0	0	0	0	$ -	0	0	0	0	0	0	$ -	0	0	0	$ -	0	$ -	$ 86,837.00
Subtotals by Consultant																				$ 86,835.85									$ -							$ -							$ -							$ -			$ -		$ -	
Total - Contingency Tasks																				**$ 86,835.85**									$ -							$ -							$ -							$ -			$ -		$ -	$ 86,835.85
Estimated Project Hourly Rate	$253.37	$191.24	$135.25	$146.50	$128.81	$117.23	$246.93	$167.37	$163.04	$118.95	$155.16	$130.29	$101.05	$167.05	$135.14	$121.56	$145.35	$131.57	$95.90		$185.66	$185.66	$158.37	$99.72	$93.45	$77.69	$85.97	$83.74	$88.22		$246.45	$175.51	$134.05	$177.27	$158.94	$158.94		$322.19	$233.13	$146.08	$117.87	$117.87	$128.35		$80.59	$90.62	$112.11	$71.86	$153.18	$118.53		$201.81	$96.30	$92.59		$185.66		
NOTE: Actual Bill Rates will be calculated based on the Overhead/FCCM Rate Profit Schedule shown in the contract																																																							
Total Including Contingencies																				**$ 1,738,516.13**									**$ 356,091.53**							**$ 76,040.68**							**$ 563,394.94**							**$ 25,944.43**			**$ 29,048.81**		**$ 28,430.00**	**$ 2,817,466.52**



Vicinity Map



CITY OF Vancouver WASHINGTON

Staff Report: 108-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
Contract Amendment - Increase the Maximum Expenditures for State of Washington DES 00819: Fleet Card Services - C-100675

Key Points

- The City contracts with WEX Bank under Contract C-100675 for purchasing fuel and EV charging.
- Purchases from this contract would exceed the current purchasing threshold of $300,000.
- This contract is set to expire on December 31, 2027.

Strategic Plan Alignment
Transportation and Mobility – a safe, future-ready and convenient transportation system.

Present Situation
WEX fuel cards provide city departments with flexibility to purchase fuel and electric vehicle charging when fleet vehicles are operating outside the City or when vehicles are unable to return to one of the City's fueling sites. In the event of a fuel supply disruption or catastrophic emergency, these cards also provide a critical contingency resource, allowing continued access to fuel and EV charging allowing vehicles to remain in service until normal fueling and charging operations are restored.

Advantage(s)

1. This contract allows for purchasing fuel and EV charging at participating fuel stations nationwide.
2. The approval for continued use of this contract will enable Fleet Services to take advantage of this contract's competitive pricing and rebates.

Challenge(s)
None

Budget Impact
The City will utilize the contract for purchasing fuel and EV charging and will stay within the current authorized budget.

Prior Council Review
None

Action Requested

On Monday, June 1, 2026, authorize the City Manager, or designee, to finalize and execute a contract amendment with WEX Bank to increase the current maximum approval from $300,000 to $600,000. The amended amount would be used to purchase fuel and EV charging.

Staff Contact

Jacob Mahan, Senior Management Analyst, jacob.mahan@cityofvancouver.us

Attachments:

1. Amendment 1
2. Contract
3. PO Sample
4. Master Agreement Amended

State of Washington Contracts & Procurement Division – Internal Contracts Department of Enterprise Services P.O. Box 41411 Olympia, WA 98504-1411	**NASPO VALUE POINT MASTER AGREEMENT AMENDMENT**	
	Contract No.:	00819
WEX Bank 111 East Sego Lily Drive, Suite 250 Sandy, UT 84070	Amendment No.:	1
	Effective Date:	April 1, 2024

FIRST AMENDMENT
TO
NASPO VALUEPOINT MASTER AGREEMENT NO. 00819
FLEET CARD SERVICES

This First Amendment ("Amendment") to NASPO ValuePoint Master Agreement No. 00819 is made and entered into by and between the State of Washington acting by and through the Department of Enterprise Services, a Washington State governmental agency ("Enterprise Services") and WEX Bank, a Utah Corporation ("Contractor") and is dated and effective as of April 1, 2024.

R E C I T A L S

A. Enterprise Services and Contractor (collectively the "Parties") entered into that certain NASPO ValuePoint Master Agreement No. 00819 dated effective as of October 1, 2020 ("Contract").

B. The Parties now desire to amend the Contract, to clarify defined terms, replace subsection 8.1, and insert additional exhibits "H" and "I" as specified herein.

C. The amendment set forth herein is within the scope of the Contract.

A G R E E M E N T

NOW THEREFORE, in consideration of the mutual covenants and agreements set forth herein, the Parties hereby agree to amend the Contract, as follows:

1. CLARIFICATION OF DEFINED TERMS.
   a. The definition of "File Turn" set forth in "Exhibit F" is hereby deleted and replaced with:

      "File Turn", "File Turn Days" or "file turn days" (as the case may be): the number of days from the date an invoice is generated to the date that such invoice is paid in full, and this change is effective October 1, 2020.

   b. The definition of "National Annual Volume Incentive" set forth in "Exhibit F" is hereby deleted, as such term is defined and clarified within "Exhibit B" and this change is effective October 1, 2020.

2. CONTRACTOR SALES REPORTING; ADMINISTRATIVE FEE; & CONTRACTOR REPORTS. Subsection 8.1 is hereby removed in its entirety and replaced with the following:

   8.1. NASPO VALUEPOINT ADMINISTRATIVE FEE. Contractor shall pay to NASPO ValuePoint, or its assignee, a NASPO ValuePoint Administrative Fee of one-quarter (1/4 or 25%) of one basis point (0.0025% or 0.000025) of the National Annual Volume no later than sixty (60) days following the end of each calendar quarter. The NASPO ValuePoint administrative fee is not negotiable. This fee may not be adjusted in any Participating Addendum. This fee is to be included as part of the pricing submitted with the bid.

3. ADDITION OF EXHIBIT H
   a. The attached Exhibit H "EV Charging En Route Solution Enrollment Form" is hereby added as Exhibit H of the Contract.

4. ADDITION OF EXHIBIT I
   a. The attached Exhibit I "Home EV Charging Reimbursement Solution Enrollment Form" is hereby added as Exhibit I of the Contract.

5. NO CHANGE OTHER THAN AMENDMENT. Except as amended herein, the Contract is unaffected and remains in full force and effect.

6. INTEGRATED AGREEMENT; MODIFICATION. This Amendment constitutes the entire agreement and understanding of the Parties with respect to the subject matter and supersedes all prior negotiations and representations. In the event of any conflict between this Amendment and the Contract or any earlier amendment, this Amendment shall control and govern. This Amendment may not be modified except in writing signed by the Parties.

7. AUTHORITY. Each party to this Amendment, and each individual signing on behalf of each party, hereby represents and warrants to the other that it has full power and authority to enter into this Amendment and that its execution, delivery, and performance of this Amendment has been fully authorized and approved, and that no further approvals or consents are required to bind such party.

8. ELECTRONIC SIGNATURES. An electronic signature of this Amendment or any other ancillary agreement shall be deemed to have the same legal effect as delivery of an original executed copy of this Amendment or such other ancillary agreement for all purposes.

9. COUNTERPARTS. This Amendment may be executed in one or more counterparts, each of which shall be deemed an original, and all of which counterparts together shall constitute the same instrument which may be sufficiently evidenced by one counterpart. Execution of this Amendment at different times and places by the parties shall not affect the validity thereof so long as all the parties hereto execute a counterpart of this Amendment.

EXECUTED AND EFFECTIVE as of the day and date first above written.

WEX BANK,
A UTAH CORPORATION

By: DocuSigned by: Jason Price EE6EEC720DFF478...

Name: Jason Price

Title: President / CEO

Date: 7/12/2024

APPROVED
W441202 , 7/12/2024, 3:13:33 PM

STATE OF WASHINGTON
DEPARTMENT OF ENTERPRISE SERVICES

By: Kimberly Kirkland

Name: Kimberly Kirkland

Title: IT Procurement Supervisor

Date: 7/16/2024

Exhibit H

GOVERNMENT -- EV CHARGING EN ROUTE SOLUTION
ENROLLMENT FORM

This En Route EV Charging Solution Enrollment Form ("**Enrollment**") is submitted by the entity listed below ("**Company**"). Upon WEX Bank's ("**Issuer**") approval of Company's enrollment, this Enrollment will govern the provision of the Solution (as defined hereunder) by Issuer to Company, and will incorporate the terms of the Business Charge Account Agreement between Company and Issuer ("**Agreement**"). The Company and Issuer are referred to individually as a "**Party**" and jointly as the "**Parties**". Capitalized terms used in this Enrollment that are not otherwise defined shall have the meanings set forth in the Agreement.

Company Name:	
Company Address:	City/State/Zip:
☐ New Customer	☐ Existing Customer Account Number:
☐ Tax Exempt Organization	

EV CHARGING EN ROUTE SOLUTION ("SOLUTION")

Company wishes to enable Card acceptance or payment via an Authorized Payment Device (defined below) at certain electric vehicle ("**EV**") charging stations operated by charge point operators participating in the WEX Inc. card network (each, a **"CPO Merchant"**) pursuant to the terms set forth in this Enrollment and the terms of the Agreement.

FEES, BILLING, AND PAYMENT

EV Enabled Card Fee. The Company will pay a **monthly fee of $5.00** (the "**EV Fee**") for **each** Card that is enabled for Transactions at EV charging stations. The EV Fee applies for each Card enabled on any day of a given calendar month.

Authorized Payment Device Replacement Fee. Company will be provided one radio frequency identification (RFID) device to use as an Authorized Payment Device (as defined below) for each enabled Card at no additional cost. If an RFID device needs to be replaced, an additional RFID device will be provided and Company will be charged $10.00 per additional RFID device, with the original RFID to be disabled.

Payment Terms. Billing for purchases made with an Authorized Payment Device shall be pursuant to the terms of the Agreement.

No Rebates. Any purchases made through use of an Authorized Payment Device shall not be eligible for any Rebate provided under the Agreement.

TERMS AND CONDITIONS

1. **Solution Description.** Pursuant to the terms of this Enrollment and the Agreement, Company will use an Authorized Payment Device to purchase EV charging from CPO Merchants. An "**Authorized Payment Device**" means any RFID device, a physical form of payment or a mobile application, in any case specified and provided by Issuer. Subject to completing the request in section 2.1, Company authorizes Issuer to connect an EV-enabled Card to an Authorized Payment Device to initiate and complete purchases from CPO Merchants. All terms and conditions of the Agreement applicable to "Cards" or to Transactions using a Card shall also apply to the Authorized Payment Devices and Transactions using an Authorized Payment Device, except to the extent expressly set forth otherwise in this Enrollment.

2. Company Responsibilities

2.1 Upon acceptance and approval of this completed Enrollment by Company, Issuer will enable one or more Cards designated by Company for use for purchases from CPO Merchants. Upon such enablement by Issuer, any individual that uses the Authorized Payment Device linked to that Card shall be considered an "**Authorized EV Charging User**." Company may add or change Cards or Authorized EV Charging Users, or request additional RFID devices in the online portal.

2.2 Company will comply with, and shall ensure all Authorized EV Charging Users to comply with, any reasonable instructions provided by Issuer or the applicable CPO Merchant pertaining to use of EV charging, the EV charging station equipment and related applications, any mobile applications intended for use with the Solution, and any Authorized Payment Devices.

2.3 ChargePoint Charging. This section applies if Company or Authorized EV Charging Users purchase EV charging or related products and services from ChargePoint and its network operators. The Authorized Payment Device provided to Company or any Authorized EV Charging User may include or utilize services, software and/or other proprietary materials of ChargePoint, Inc. ("**ChargePoint**") in connection with Company's or any Authorized EV Charging User's accessibility to electric vehicle charging services provided via ChargePoint and its network (collectively, "**ChargePoint Technology**"). Company hereby represents and warrants that its use and/or any Authorized EV Charging User's use of any of the Charge Technology shall be governed by and subject to the following: (i) ChargePoint Terms of Service (found at: https://na.chargepoint.com/terms_mobile?instance=NA-US&country_id=233&locale=en) (collectively, "**ChargePoint Terms**"); and (ii) ChargePoint,

as a third-party beneficiary with respect to the ChargePoint Terms, shall be entitled to enforce any of the ChargePoint Terms against Company with regards to Company's use or any Authorized EV Charging User's use of the ChargePoint Technology.

With sole respect to the Enrollment, the following Special Terms apply if a Company is a state or local government entity ("**Special Entity**") and only to the extent that any offerings provided under the Enrollment are being used in a Company's official capacity as a state or local government entity ("**Special Purpose**"). In the event of any conflict or inconsistency between the Enrollment terms, including the ChargePoint Terms of Service for ChargePoint® Accounts and the Special Terms, the following Special Terms shall prevail for the Special Purpose.

Special Terms:

I. Governing law and venue shall be those of the respective state of the Special Entity;
II. Limitation of liability terms in the Enrollment terms shall not apply to the Special Entity;
III. Indemnification terms in the Enrollment terms shall not apply to the Special Entity; and
IV. Arbitration terms in the Enrollment terms shall not apply to the Special Entity.

2.4 Company will immediately notify Issuer when an Authorized EV Charging User leaves the Company, retires or is absent for an extended period of time.

3. Issuer Responsibilities. Upon receipt of a request in the online portal to enable a Card for EV charging, Issuer will enable the applicable Account for EV charging and provide an Authorized Payment Device if requested by Company. Upon enablement of the Account, Company may use a mobile application designated by Issuer for EV charging upon downloading and/or updating the mobile application, as applicable. If an Authorized EV Charging User already has access rights to use EV charging with an CPO Merchant, Issuer may "link" preexisting account information. Use of a mobile application may be subject to additional terms and conditions as set forth in the relevant application. Company must comply and must ensure that its Authorized EV Charging Users comply with the policies and terms of use posted on such mobile applications or otherwise provided to Company by Issuer.

4. Data Collection and Usage

4.1 Issuer owns all data collected by or on behalf of Issuer in connection with Company's use of the Solution, including but not limited to transactional data collected at EV charging stations. Any feedback provided by Company in connection with its use of the Solution shall be owned by Issuer, including any suggested improvements to the Solution.

4.2 Activation of an Authorized Payment Device may require Issuer to share certain Company and Authorized EV Charging User information with the applicable CPO Merchant, including contact information, VIN information and usage associated with Company's Account. Additionally, for Cards issued with the name of an Authorized EV Charging User, Issuer may ask for personally identifiable information from the Authorized EV Charging Users and may share this information with the applicable CPO Merchant in order for it to provide and support services related to the access to and provision of the Solution.

5. Controls. The application of any Controls may not be available for purchases on an Authorized Payment Device when an RFID is used and Company agrees to be liable for purchases made with a CPO Merchant even if a Control has been exceeded for any Transaction. Subject to the terms of the Agreement, Company remains liable for all EV charging session fees billed to its Account.

6. Term; Termination. The term of this Enrollment will commence on the date this signed Enrollment is submitted to Issuer ("**Enrollment Effective Date**") and will continue on an ongoing basis until either Party terminates as set forth in this section. Either Party may terminate this Enrollment at any time for any reason upon thirty (30) days' prior written notice to the other Party, provided that Company will not be entitled to a refund of any EV Fees paid and must pay all amounts due through the effective date of termination. Issuer may also suspend usage of any Authorized Payment Device in its sole discretion, including if it reasonably believes it is being used for any unauthorized or fraudulent purpose. Upon termination of this Enrollment, Company shall return all Authorized Payment Devices to Issuer within 30 days of the effective date of termination.

7. Miscellaneous. This Enrollment will also be subject to and governed by the Agreement and any subsequent amendments, modifications, or replacements thereto. If there is any conflict between the provisions in this Enrollment and the provisions in the Agreement, the provisions in this Enrollment shall prevail but only with respect to the Solution. Issuer may modify the terms and conditions of this Enrollment, including any applicable fees, pursuant to the terms of the Agreement. No course of dealing between the Parties will be construed as a waiver of any breach or right, and no waiver of any breach or right arising under this Enrollment will be effective unless consented to in writing in the form of an amendment signed by both Parties, nor shall it be construed as a waiver of any breach or right subsequently. This Enrollment may be executed electronically.

The undersigned hereby executes this Enrollment on behalf of Company as an authorized representative of Company. Company understands that Company's participation in the Solution is subject to acceptance by the approval of Issuer. Upon such approval, which may be evidenced by Issuer's commencement of services, the terms and conditions above, in addition to the relevant terms of the Agreement, shall govern the provision of services and products hereunder.

IN WITNESS WHEREOF, Company agrees to comply with the terms and conditions of this Enrollment.

Company: _____

Authorized Signature: _____

Print Name: _____

Title: _____

Date: _____

Exhibit I

HOME EV CHARGING REIMBURSEMENT SOLUTION

ENROLLMENT FORM

This Home EV Charging Reimbursement Solution Enrollment Form ("**Enrollment**") is submitted by the entity listed below ("**Company**"). Upon Issuer's approval of Company's enrollment, this Enrollment will govern the provision of services by WEX Inc. ("**WEX**") and Issuer to Company, and will incorporate the terms of the Business Charge Account Agreement between Company and WEX Bank ("**Agreement**"). WEX Inc. shall be the service provider of the services provided pursuant to these terms unless otherwise specified.

Company Name:	
Company Address:	City/State/Zip:
☐ New Customer*	☐ Existing Customer Account Number:
☐ Tax exempt organization	

***If New Customer this enrollment form must be accompanied by the applicable account application and agreement**

OVERVIEW

Company has employees, each of which may be a "**Designated Driver**" (as defined below) who from time to time will initiate electric vehicle charging ("**EV Charging**") on an electric vehicle ("**EV**") through use of EV Charging equipment located at the residence of the Designated Driver. Company would like WEX and/or WEX Bank (also referred to as "**Issuer**") to (i) capture the EV Charging session data; (ii) calculate the amounts to pay the Designated Driver for an EV charging session; and (iii) make payments to the Designated Driver in amounts specified by the Company.

FEES

Subscription Fee. As a participant in the Program, the Company will be charged a **monthly $12.00** fee for **each Designated Driver** for the following services provided by WEX:

- Utilize the WEX Online portal to initiate account creation for Designated Drivers to be paid EV Charging Costs for Charging Sessions
- Calculate recommended EV Charging Costs for each Charging Session
- Mobile applications for Designated Drivers to set up accounts to support the calculation and receipt of EV Charging Costs

Card-related Fees. The following fees and fee exemptions will be charged to Company for services provided by WEX Bank and will apply with respect to activity on card accounts issued to Designated Drivers:

Type		
Load Fee	$waived	Fee per load to each card- ***Paid by Company***
Instant Issue Card Packet Fee	$waived	Fee per instant issue card packet ordered- ***Paid by Company***

Cardholder-paid fees that apply to all cardholder activity are set forth in **Table 1**.

TERMS AND CONDITIONS

DEFINITIONS. Unless otherwise specified in the Agreement, capitalized terms used in these terms shall have the following meanings**:**

"Card" means the prepaid card issued by Issuer to a Designated Driver onto which funds will be loaded at the direction of Company for payment of EV Charging Costs.

"Charging Session" means the EV charging session completed at the Residence of the Designated Vehicle.

"Charging Session Authorization" means the authorization provided by the Designated Driver to: (i) the CPO that instructs the CPO to share all Charging Session Data with WEX; or (ii) to WEX that it has the rights to access the Charging Session Data from the CPO.

"Charging Session Data" means all data provided by CPO (or a third party designated by WEX) to WEX in connection with a Charging Session.

"CPO" means the third-party supplier of the EV Charging equipment located at the Residence that collects Charging Session Data and provides other EV Charging related services to the Designated Driver.

"Designated Driver" means an employee of the Company who has been designated by Company to be paid EV Charging Costs for Charging Sessions in accordance with the terms of this Enrollment and has been setup to receive EV Charging Costs in accordance with the terms of this Enrollment, including being issued a Card.

"Designated Vehicle" means the EV specified by Company in the setup for which a Designated Driver may claim EV Charging Costs.

"EV Charging Costs" means the amounts specified by the Company to be paid to the Designated Driver.

"Program" means the Home EV Charging Reimbursement Solution which is the provision of services by WEX and WEX Bank as set forth in this Enrollment.

"Residence" means the Designated Driver's residence where the EV Charging equipment is located.

"Utility" means the Designated Driver's electricity provider at the Residence.

EFS MASTERCARD CARD ACCOUNTS. Under the Program, Designated Drivers will be issued Cards funded by Company to reimburse Designated Drivers for their EV Charging Costs.

Once funds are loaded to an EFS MasterCard card account, for purposes of this Program, ownership of the funds transfers from Company to the applicable Designated Driver. Accordingly, Company may not dictate to Issuer the disposition of such funds, and Issuer may restrict Company's ability to see transaction activity, balances, or any other activity specific to the Designated Drivers' EFS MasterCard card account.

COMPANY RESPONSIBILITIES. Company must set up an account for each Designated Driver within WEX Online and must specify information for each Designated Driver as requested by WEX which at a minimum shall include: Name, email, residence address, including zip code, telephone number, and Designated Vehicle**.** Each Designated Driver must: (i) complete any documentation required to use the Card; and (ii) download (a) the WEX DriverDash mobile application or update the application if already used by the Designated Driver; (b) the WEX PayControl mobile application; and (c) the applicable CPO mobile application, activate the EV charger, and indicate that charging sessions must be shared with WEX.

Upon review of the recommended EV Charging Costs for each Charging Session, Company shall indicate whether the recommended EV Charging Costs are "approved" or "denied" through use of the process set up in WEX Online. Designated Drivers will be able to indicate whether a Charging Session is for personal or professional use; however, during the Pilot this option will not be available.

Company shall deposit the funds due to Designated Drivers into an account designated by Issuer ("**Issuer Controlled Account**") by wire transfer or ACH transfer or other means approved in advance by Issuer. Company shall transfer funds into the Issuer Controlled Account, for the purpose of disbursing funds to the Designated Driver Cards. Company shall provide, in the format specified by Issuer, the identity of, and the amount of such funds due to, each Designated Driver ("**Disbursement Detail**"). Company acknowledges that Issuer will make funds available to Designated Drivers commencing on the business day Issuer receives cleared funds and the corresponding Disbursement Detail. Issuer shall not have any obligation to make any funds available to Designated Drivers for whom the Disbursement Detail is missing or incomplete or if Issuer's records indicate that insufficient funds are available to complete a transaction. Company shall be able to make instant loads to Cards as needed with no requirement for a minimum balance to be maintained in the account, except that Company must maintain sufficient funds in the Issuer Controlled Account to cover the disbursements that it is directing Issuer to make to Designated Drivers.

ENROLLMENT MATERIALS. The Enrollment Materials include, without limitation, the Short Form Disclosure, Cardholder Agreement, a Card and any disclosures provided by Issuer or as may be required by applicable law and regulation.

Company represents and warrants that all payment data submitted to Issuer and WEX in connection with Designated Drivers and the Program is true, accurate and complete, and is sufficient to enable Issuer to allocate the funds among the various Designated Drivers and honor withdrawal requests by Designated Drivers. Company confirms that Issuer and WEX may rely on such data without any obligation to verify it.

Company shall comply with applicable law and card network rules in connection with its obligations under the Agreement. Company represents and warrants that it shall not use the Program, and shall use its best efforts to prevent itself from being used, for any illegal purpose or activity, including without limitation, money laundering.

Company shall keep records of all transactions and activities performed under this Enrollment for a period of not less than six (6) years after the expiration or termination of this Enrollment.

Where the Designated Driver is using any EV Charging equipment, services, software and/or other proprietary materials provided by ChargePoint Inc. ("**ChargePoint**") for EV Charging Sessions (collectively, "ChargePoint Technology"), Company hereby represents and warrants that each Designated Driver shall agree to the following terms (to be provided during the setup or update of the DriverDash application):
(i) ChargePoint Privacy Policy (found at: https://na.chargepoint.com/privacy_policy); (ii) ChargePoint Terms of Service (found at: https://na.chargepoint.com/terms_mobile?instance=NA-US&country_id=233&locale=en); and (iii) ChargePoint Connection: (found at: https://na.chargepoint.com/connection_tnc?instance=NA-US&locale=en-US&region_code=NA-US&company_id=192871&company=WEX). (collectively, "**ChargePoint Terms**") ChargePoint, as a third-party beneficiary with respect to the ChargePoint Terms, shall be entitled to enforce any of the ChargePoint Terms against Company with regards to any Designated Driver's use of the ChargePoint Technology.

ISSUER RESPONSIBILITIES. Except for services provided directly by WEX to the Company, Issuer shall provide or contract for all such functions and services necessary to, create, operate and administer the Program including but not limited to, account set up and enrollment assistance for all Designated Drivers. Issuer shall grant user-level access to Company and Designated Drivers to the systems used to support the Program.

Issuer shall comply with applicable law and, as applicable, card network rules in connection with its obligations under the Agreement.

WEX RESPONSIBILITIES. In addition to the provision of certain services provided to Issuer to support its operation and administration of the Program, WEX shall provide certain services directly to Company as set forth below.

WEX shall confirm that the Designated Driver Authorization has been set up with the CPO so that WEX can receive Charging Session Data for that Designated Driver.

In order to calculate EV Charging Costs for a Charging Session, WEX must receive Charging Session Data from the CPO. Upon receipt of the Charging Session Data:

- if the "Utility Rate Option" is selected by Company, WEX calculates the recommended EV Charging Cost for a Designated Driver by reviewing the Charging Session Data and the applicable utility tariffs for the Residence at the time of each Charging Session, utilizing data collected by third parties. For the Utility Rate Option, WEX cannot guarantee the accuracy of the data collected by third parties when calculating the EV Charging Cost. WEX will provide utility rates gathered by such third parties upon request by the Company. To the extent that either WEX or Company identify any errors in the calculation, WEX shall update the calculation and notify Company and adjust any EV Charging Costs, as applicable.
- If the "Flat Rate Option" is selected by the Company, WEX will advise Company of the length of a Charging Session and Company will then designate a flat rate amount per kilowatt hour based on parameters provided by WEX in WEX Online to be used to calculate the EV Charging Costs for that Charging Session.
- To the extent that the Designated Driver indicates that any Charging Session is for personal use, WEX will reduce from the calculated amount.

The EV Charging Costs shall be displayed in WEX Online for Company to review and approve as set out above. Based on approvals provided by Company, WEX shall notify Company of the amount to be paid to Issuer.

WEX shall comply with applicable laws in connection with its obligations under the Enrollment.

FEES AND CHARGES. Company acknowledges that certain fees and charges are to be paid by Company and that other fees and charges are to be paid by Designated Drivers, and that the Designated Driver fees and charges will be set forth in the Cardholder Agreement statement that will be included in the Enrollment Materials. The current fees for: (i) Company are set forth above; and (ii) Designated Drivers are set forth in Table 1. Issuer reserves the right to change the Designated Drivers' fees with appropriate prior written notice to Designated Drivers.

TERM. The term of Customer's Enrollment will commence on the date of Customer's signature below and will continue for a period of twelve (12) months ("**Initial Term**") and shall automatically renew for annual terms (each a "**Renewal Term**") thereafter until terminated in accordance with this section. Any party may terminate this Enrollment at any time after the Initial Term for any reason upon sixty (60) days' prior written notice to the other party, subject to the payment of any damages as set forth below. Upon termination of this Enrollment, Company may cancel any agreement with a Designated Driver once all approved EV Charging Costs have been paid by Issuer to the Designated Driver. Either party may terminate this Enrollment upon thirty (30) days' prior written notice to the other party, if such party breaches or violates any provision of this Enrollment and any such default, breach or violation, as described in such notice with specificity and in

reasonable detail, is not remedied in all material respects within the applicable thirty (30) day notice period. This Enrollment will terminate automatically upon termination of the Agreement. If this Enrollment is terminated for any reason prior to the end of the Initial Term or any Renewal Term other than due to a default or breach by WEX or Issuer, Company must pay liquidated damages in the amount of the monthly fee for each month remaining in the Initial Term or Renewal Term, as applicable.

SYSTEM AND TRANSACTION MONITORING. Issuer reserves the right to monitor Card activity, and to refuse to issue a Card, cancel a Card previously issued to a Designated Driver or temporarily suspend usage of a Card due to actual or suspected fraudulent use, illegal use, or unauthorized use, and to comply with applicable law, card network rules, and bank safety and soundness requirements. Except as prohibited by applicable law, Issuer shall disburse to the Designated Driver any funds remaining on a canceled Card.

COMPLIANCE WITH LAWS. Issuer complies with federal law which requires all financial institutions to obtain, verify, and record information that identifies each Company or Designated Driver who opens an account. Issuer may ask Company or Designated Driver for the name, address, date of birth, and other information that will allow Issuer to identify the Company and/or Designated Driver. Company shall reasonably cooperate with Issuer in providing such information. Issuer reserves the right to not open an account or suspend an existing account as required for compliance with these rules.

Each Designated Driver shall be required to enroll in the Program by submitting certain information to Issuer, and his or her participation shall be contingent on Issuer's successful completion of its "know your customer" due diligence and other legal requirements. The terms and conditions governing the use of the Cards and the accounts associated with such Cards will be supplied by Issuer. Accounts shall be opened only for Designated Drivers that are residents of the United States and its territories.

As between the parties, Company is solely responsible for ensuring that its practices pertaining to the reimbursement of its employees comply with all federal, state, and local laws, including, without limitation, that use of the EFS MasterCard Card services for reimbursing employees is permissible in the jurisdictions in which Company operates. Company acknowledges and agrees that Issuer is not responsible and has not advised Company, regarding such compliance. Company hereby represents, warrants, and covenants to Issuer that (i) Company's reimbursement practices will comply with all applicable law, (ii) each employee agreeing to receive reimbursements on the EFS Mastercard Card is doing so voluntarily, and such agreement was not made a condition of such employee's employment, and (iii) that prior to the initial payment to a Designated Driver, Company has provided such Designated Driver with a copy of the Issuer's EFS Mastercard Cardholder Agreement. Company will indemnify, defend, and hold harmless Issuer and Issuer's officers, directors, employees, affiliates, and agents from any and all liability, losses, costs, fines, penalties or damages (including court costs and reasonable attorneys' fees) in the event of any third party claim (including any claim or enforcement action brought by any governmental entity) arising out of or relating to any breach by Company of the provisions of this paragraph.

TAXES. Company is responsible for any local, state, federal or foreign tax, fee, assessment, surcharge and/or penalty imposed, assessed or levied against or with respect to the EV Charging Costs or the services provided by WEX or the Issuer pursuant to this Enrollment. This includes the funding, remittance, and determination of the amount due for EV Charging Costs. In the event that WEX or Issuer is required to pay any such tax, fee, assessment, surcharge and/or penalty on behalf of Company, WEX or Issuer shall report the payment to Company along with documentation of the payment, and Company shall promptly reimburse WEX or Issuer (as applicable) for the full amount. This reimbursement would be in addition to the fees described above. The calculation of EV Charging Costs does not take any consideration as to what is a reimbursable cost by an employer to an employee for tax purposes. Further, the parties agree that neither WEX nor Issuer provides any legal, tax or accounting advice to Company. WEX and Issuer are at all times responsible for all the taxes based upon each of their net income and their property ownership.

DATA COLLECTION AND USAGE. Issuer, WEX, CPO merchants, and other third parties will collect data in connection with the provision of the Home EV Charging Reimbursement Solution including but not limited to transactional data collected during Charging Sessions. This transactional data and all other data that is collected in connection with the Home EV Charging Reimbursement Solution shall be owned by the applicable CPO, WEX and/or other third parties. Any feedback provided by Company in connection with its use of the Home EV Charging Reimbursement Solution shall be owned by WEX, including any suggested improvements to the Home EV Charging Reimbursement Solution. Activation of a Designated Driver may require WEX to share certain Company and Designated Driver information with the applicable CPO, including contact information. Additionally, WEX or Issuer may ask for personally identifiable information from Designated Drivers to activate the services provided under this Enrollment and may share this information with the applicable CPO and other third parties in order for WEX or Issuer to provide and support services related to the access to and provision of the Home EV Charging Reimbursement Solution.

MISCELLANEOUS. This Enrollment will also be subject to and governed by the Agreement and any subsequent amendments, modifications, or replacements thereto. If there is any conflict between the provisions in this Enrollment and the provisions in the Agreement, the provisions in this Enrollment shall prevail but only with respect to the products and services provided in this Enrollment. Issuer may modify the terms and conditions of this Enrollment, including any applicable fees, pursuant to the terms of the Agreement. No course of dealing between the Parties will be construed as a waiver of any breach or right, and no waiver of any breach or right arising under this Enrollment will be effective unless consented to in writing in the form of an amendment signed by both Parties, nor shall it be construed as a waiver of any breach or right subsequently. This Enrollment may be executed electronically.

The undersigned hereby executes this Enrollment on behalf of Customer as an authorized representative of Customer. Customer acknowledges and agrees that Customer's participation in this program is subject to the review and approval of Issuer. Upon such approval, which may be evidenced by WEX and/or Issuer's commencement of services, the terms and conditions above, in addition to the relevant terms of the Agreement, shall govern the provision of services hereunder.

IN WITNESS WHEREOF, Customer has executed this Enrollment as of the date set forth below.

Customer: _____

Authorized Signature: _____

Print Name: _____

Title: _____

Date: _____

TABLE 1

The following table shows cardholder-paid fees that will apply to all cardholder activity on the EFS MasterCard card accounts issued to Designated Drivers. Designated Drivers will be given notice of these fees via separate communication including through the Short Form Disclosure and Cardholder Agreement. References to "you" and "your" in the following table refer to the employee cardholder, and not to Company.

All fees	Amount	Details
Get started		
Activation enrollment fee	$0	
Monthly usage		
Monthly fee	$0	
Spend money		
Purchase (EFS merchant)	$0	To find an EFS merchant, use the EFS PayControl mobile phone application or call 1-888-824-7378.
Purchase (PIN authentication)	$0	Per purchase at a non-EFS merchant when you enter your PIN to complete a transaction.
Purchase (signature authentication)	$0	Per purchase at a non-EFS merchant when you give your signature to complete a transaction.
Merchant purchase decline	$0	Per attempted purchase transaction at a merchant terminal that is declined for insufficient funds.
Get cash		
Register an EFS check	$4	Per check when you obtain an authorization code to register an EFS check, by calling 1-888-824-7378 or visiting www.efsllc.com. Fee does not apply to first EFS check you register per pay period.
Cash an EFS check	$0	Per check when you cash an EFS check. This is our fee. You may be charged a fee by the party that cashes your EFS check.
EFS check void	$25	Per request to void an EFS check or if a balance remains on an uncashed check after 180 days from the date of registration.
EFS Network Cash	$1.50	Receive cash at a participating EFS merchant. To find an EFS merchant, use the EFS PayControl mobile phone application or call 1-888-824-7378.
Teller-Assisted Cash Withdrawal	$4	Withdraw funds at banks displaying the MasterCard Acceptance Mark. Fee does not apply to first teller-assisted cash withdrawal per pay period.
ATM withdrawal	$2	This is our fee. You may also be charged a fee by the ATM operator, even if you do not complete a transaction.
Surcharge Free ATM Withdrawal	$2	This is our fee. ATM withdrawals within the AllPoint ATM network are surcharge free from the ATM operator. Find AllPoint locations at www.allpointnetwork.com.
ATM withdrawal decline	$1	Per attempted ATM withdrawal or Surcharge Fee ATM withdrawal that is declined for insufficient funds.
Information		
ATM balance inquiry	$0	You may be charged a fee by the ATM operator, even if you do not complete a transaction.
Written account histories	$3	Per each written account history requested. Fee does not apply to first written account history request per calendar month.
Using your Card outside the U.S.		
International transaction	2%	Of the U.S. dollar amount of each purchase transaction.
Other		
Inactivity	$0	
Transfer funds from Card to your checking or savings account	$0	To make a transfer from your Card to your checking or savings account, call 1-888-824-7378 or visit www.efsllc.com.
Card replacement	$5	Per request for a replacement Card.
Card replacement shipping	$10 or $25	Based on whether a replacement Card is sent via standard (7-10 day) shipping or overnight shipping.
Request a copy of an EFS check	$5	Per request for a copy of an EFS check.

Your funds are eligible for FDIC insurance. Your funds will be held at or transferred to WEX Bank, an FDIC-insured institution. Once there, your funds, in the aggregate with any other deposits you maintain at WEX Bank, are insured up to $250,000 by the FDIC in the event WEX Bank fails, if specific deposit insurance requirements are met. See *fdic.gov/deposit/deposits/prepaid.html* for details.

No overdraft/credit feature.

Contact WEX Bank by calling 1-888-824-7378 or the number on the back of your Card, by mail at WEX Bank, c/o EFS Customer Service, 1104 Country Hills Drive, Suite 600, Ogden, UT 84403, or visit www.efsllc.com.

For general information about prepaid accounts, visit *cfpb.gov/prepaid*. If you have a complaint about a prepaid account, call the Consumer Financial Protection Bureau at 1-855-411-2372 or visit *cfpb.gov/complaint*.

Washington_NASPO_Fleet_Card_First_Amendment-Final_for_sig_STAMPED_12_July_2024

Final Audit Report 2024-07-16

Created:	2024-07-16
By:	Janet Parker (janet.parker@wexinc.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAp16e6hWVehKBau_BYwuycJh_3C7DJgQA

"Washington_NASPO_Fleet_Card_First_Amendment-Final_for_sig_STAMPED_12_July_2024" History

Document digitally presigned by DocuSign\, Inc. (enterprisesupport@docusign.com)
2024-07-15 - 12:32:07 PM GMT

Document created by Janet Parker (janet.parker@wexinc.com)
2024-07-16 - 8:07:27 PM GMT

Document emailed to Kim Kirkland (kim.kirkland@des.wa.gov) for signature
2024-07-16 - 8:08:27 PM GMT

Email viewed by Kim Kirkland (kim.kirkland@des.wa.gov)
2024-07-16 - 9:02:59 PM GMT

Document e-signed by Kim Kirkland (kim.kirkland@des.wa.gov)
Signature Date: 2024-07-16 - 9:04:44 PM GMT - Time Source: server

Agreement completed.
2024-07-16 - 9:04:44 PM GMT

CITY OF VANCOUVER
Procurement Services
(360) 487-8430
(360) 487-8433 fax
www.cityofvancouver.us
Federal Tax ID No. 91-6001288

Contract #:	C-100675
Start Date:	Jul 20, 2021
End Date:	Dec 31, 2027
Total Contract Amount:	$300,000.00

Wex Bank
PO Box 4337
Carol Stream, IL 60197

Submit all invoices and questions to:

Dan Zenger / Dan.Zenger@cityofvancouver.us

Contract Overview

11/18/25 Per DES contract, extend to 12/31/27. JH

Terms and Conditions

Fleet Card Services #00819 Contract and Amendments thereto (“Master Contract”) between the Contractor and Washington State DES adopted and incorporated herein by this reference. The City shall be afforded all rights and privileges as "Washington State DES" under the terms of the master contract.

Lisa Brandl
Authorized Signature

CITY OF VANCOUVER
Procurement Services
(360) 487-8430
procurement.services@cityofvancouver.us
www.cityofvancouver.us
Federal Tax ID No. 91-6001288

Purchase Order #:	PO-73675
Revision #:	1
Effective Date:	1/15/26
Contract #:	C-100675

This Purchase Order number must appear on all invoices, packing lists, and correspondence related to this order.

Wex Bank
P.O. Box 6293
Carol Stream, IL 60197-6293

Submit Invoice To:

City of Vancouver
Jacob Mahan
PO Box 1995
Vancouver, WA 98668
Jacob.Mahan@cityofvancouver.us
accpay@cityofvancouver.us

Ship To:

City of Vancouver
Jacob Mahan
Ops Center - Fleet Services
4711 E Fourth Plain Blvd
Vancouver, WA 98661

If you have any questions regarding this order, please contact:

Jacob Mahan / (360) 487-8195 Jacob.Mahan@cityofvancouver.us

Line #	Line Description	Qty	UOM	Unit Price	Tax	Amount
1	2026 FUEL CARD PURCHASES FOR UNLEADED MISC CITY VEHICLES	62000	Each	1.00	5,456.00	62,000.00
2	2026 FUEL CARD PURCHASES DIESEL MISC CITY VEHICLES	4000	Each	1.00	352.00	4,000.00
3	2026 FUEL CARD PURCHASES DIESEL FOR FIRE DEPT VEHICLES	5000	Each	1.00	440.00	5,000.00
4	2026 FUEL CARD PURCHASES UNLEADED FOR FIRE DEPT VEHICLES	1000	Each	1.00	88.00	1,000.00
				Subtotal:		$72,000.00
				Tax:		$6,336.00
				Total:		$78,336.00

SAMPLE

Note to Supplier

Fleet Card Services #00819 Contract and Amendments thereto (“Master Contract”) between the Contractor and Washington State DES adopted and incorporated herein by this reference. The City shall be afforded all rights and privileges as "Washington State DES" under the terms of the master contract.

SAMPLE

Lisa Brandl

Authorized Signature

AMENDED AND RESTATED

COOPERATIVE PURCHASING MASTER AGREEMENT

NO. 00819

FLEET CARD SERVICES

For Use by Eligible Participating States

By and Between

STATE OF WASHINGTON
DEPARTMENT OF ENTERPRISE SERVICES

and

WEX BANK

Dated October 1, 2020

COOPERATIVE PURCHASING MASTER AGREEMENT

NO. 00819

FLEET CARD SERVICES

This Amended and Restated Cooperative Purchasing Master Agreement ("Master Agreement") is made and entered into by and between Enterprise Services acting by and through the State of Washington ("Enterprise Services") and WEX Bank, a Utah corporation ("Contractor") and is dated as of October 1, 2020.

RECITALS

A. Pursuant to Legislative authorization, Enterprise Services, on behalf of the State of Washington, is authorized to develop, solicit, and establish master contracts for goods and/or services to support Washington state agencies. *See* RCW 39.26.050(1); RCW 39.26.080(3). The Washington State Legislature has authorized Enterprise Services to make these master contracts available, pursuant to an agreement in which Enterprise Services ensures full cost recovery, to any other local or federal government agency or entity, any public benefit nonprofit organizations, or any tribes located in the State of Washington. *See* RCW 39.26.050(1) & (2).

B. The Washington State Legislature also has authorized Enterprise Services to participate in, sponsor, conduct, or administer certain cooperative purchasing agreements for the procurement of goods or services. *See* RCW 39.26.060(1). One of the approaches that Enterprise Services utilizes to participate in cooperative purchasing agreements with other states is NASPO ValuePoint.

C. NASPO ValuePoint is the cooperative contracting arm of the National Association of State Procurement Officials (NASPO). NASPO ValuePoint is led by state procurement officers from member states. NASPO ValuePoint does not award contracts, rather, it assists states, for an administrative fee, in their collaboration pertaining to solicitations and the resulting Master Agreements.

D. Pursuant to the NASPO ValuePoint cooperative purchasing model, a state serves as the 'lead state' to conduct a competitive procurement in compliance with that state's procurement laws and award a Master Agreement with a contractor for the specified goods or services. States (including the District of Columbia and the organized territories of the United States), including the lead state, then may participate in that Master Agreement by executing a Participating Addendum with the awarded contractor. Until a Participating Addendum is executed by the applicable state (a 'participating state'), no agency or other eligible organization (a 'purchasing entity') may utilize the products and services offered pursuant to the cooperative purchasing Master Agreement. Under Washington law, at the time of solicitation, states may provide supplemental substantive terms and conditions to inform the competitive procurement. In addition, pursuant to their Participating Addendum, states may require certain administrative terms and conditions (e.g., a vendor management fee for sales within the state, state registration and reporting). Contractor, however, has no obligation to condition execution of a Participating Addendum on substantive terms and conditions that were not competitively procured.

E. Enterprise Services, as a part of a cooperative purchasing competitive governmental procurement, with administrative support from NASPO ValuePoint, issued Competitive Solicitation No. 00719/00819 dated June 4, 2019 regarding Commercial Card Services, resulting

in two separate Cooperative Purchasing Master Agreements. Eleven (11) states indicated an intent to utilize the resulting cooperative purchasing Master Agreement.

F. Enterprise Services and a stakeholder team consisting of representatives from Washington, Oregon, California, Colorado, and Minnesota evaluated all responses to the Competitive Solicitation and identified Contractor as the Apparent Successful Bidder (ASB) Category 2 – Fleet Card Services.

G. Enterprise Services determined that entering into this Master Agreement will meet the cooperative purchasing needs and be in the best interest of the State of Washington.

H. The purpose of this Master Agreement is to enable Participating or Purchasing Entities to utilize Commercial Card Services – Fleet Card Services as set forth herein.

I. Enterprise Services and WEX Bank entered into an agreement for the products and services listed herein dated September 21, 2020 (the "Prior Agreement"), and now the parties desire to amend and restate the Prior Agreement in its entirety to modify and supplement certain terms and conditions for the purpose of clarifying the parties' original intent as of the time of the Prior Agreement.

J. For Participating States (or Participating Entities) that have already executed a Participating Addendum that references the Master Agreement, such Participating Addenda/Addendum shall be deemed to refer to this Amended and Restated Master Agreement.

AGREEMENT

NOW THEREFORE, in consideration of the mutual promises, covenants, and conditions set forth herein, the parties hereto hereby agree as follows:

1. TERM. The term of this Master Agreement starts on October 1, 2020 and ends on December 31, 2025; The Fleet Card services provided pursuant to this Master Agreement start January 1, 2021 and end on December 31, 2025; provided, however that, the contract term shall be extended for twenty-four (24) months if, in Enterprise Services' sole, reasonable judgement, Contractor meets the following performance metrics:

- Reports: Contractor provides timely and accurate reports as detailed in this Master Agreement and Participating Addendums; and
- Rebate: Contractor provides timely and accurate rebates as detailed in this Master Agreement and Participating Addendums.

Provided, further however, Contractor shall provide implementation and transition support to Participating States who wish to utilize the Master Agreement, beginning upon the Participating Addendum execution date so as to effectuate a smooth transition for Participating States and Purchasing Entities for Fleet Card services to start on January 1, 2021.

2. PARTICIPANTS. Use of this Master Agreement may be authorized by Participating States for use by Purchasing Entities as set forth herein.

2.1. PARTICIPATING STATES. For the purpose of this Master Agreement, a Participating State shall mean: any state, or U.S. territory (e.g., District of Columbia, Puerto Rico, etc.) ("State") that executes a Participating Addendum with the Contractor. Such Participating Addendum will authorize Purchasing Entities for such Participating State and must be executed by the chief procurement

officer for the applicable Participating State; *provided however*, that some States, with state authority to do so and permission from such state chief procurement officer, may authorize local governments, political subdivisions, and other entities to execute a Participating Addendum. Contractor may not provide Fleet Card Services under this Master Agreement until a Participating Addendum acceptable to the Participating State and Contractor is executed.

2.2. PURCHASING ENTITIES. For the purpose of this Master Agreement, a Purchasing Entity is any eligible entity authorized by a Participating State to participate in the Master Agreement (i.e. to purchase from the Master Agreement) pursuant to a Participating Addendum. Purchasing Entities may be required to execute a Card User Agreement (CUA) as outlined in this Master Agreement and shall be financially committed to the card account unless otherwise agreed to in the Participating Addendum.

2.3. PARTICIPATING ADDENDUM. For the purpose of this Master Agreement, a Participating Addendum is the document executed between a Participating State and Contractor that enables eligible Purchasing Entities to utilize the Master Agreement. The terms and conditions set forth in the Master Agreement are applicable to any Purchasing Entity except to the extent altered, modified, supplemented, or amended by a Participating Addendum. The Participating Addendum enables Participating States to specify state specific administrative terms and conditions to enable utilization of the Master Agreement. In no event shall a Participating Addendum change the material terms and conditions set forth in this Master Agreement. Contractor shall email a fully executed PDF copy of each Participating Addendum to PA@naspovaluepoint.org to support documentation of participation and posting in appropriate databases.

2.4. PARTICIPATING ADDENDUM CHANGES. Participating Addenda shall not be construed to amend the Master Agreement provisions pertaining to NASPO ValuePoint program requirements.

3. SCOPE – INCLUDED GOODS/SERVICES AND PRICE.

3.1. SCOPE. Pursuant to this Master Agreement, Contractor is authorized to provide only those goods and services set forth in *Exhibit A – Fleet Card Products* and *Exhibit G Fleet Card Requirements* and provide the Rebate/Incentive Share as set forth in *Exhibit B – Rebate/Incentive Share*. Contractor shall not represent to any Participating or Purchasing Entity under this Master Agreement that Contractor has contractual authority to provide any goods and services beyond those set forth in *Exhibit A – Fleet Card Products* and *Exhibit G Fleet Card Requirements*.

3.2. LEAD STATE'S ABILITY TO MODIFY SCOPE OF MASTER AGREEMENT. Subject to mutual written agreement between the parties, Enterprise Services reserves the right to modify the goods and services included in this Master Agreement; *Provided*, however, that any such modification shall be effective only upon thirty (30) days advance written notice; and *Provided further*, that any such modification must be within the scope of this Master Agreement.

3.3. INCENTIVE SHARE ADJUSTMENT. Incentive share and fees shall remain firm and fixed for the term of the Agreement. Enterprise Services reserves the right to negotiate a greater incentive share at any time during the life of the Agreement. A greater incentive share must be mutually agreed between the Parties. A Participating State may negotiate the specifics of the Incentive Share Component, but shall not exceed the total basis points offered by the Contractor.

3.4. PRICE CEILING. Contractor's Basis Points as set forth in this Master Agreement shall be fixed. Contractor's fees (e.g. overnight card delivery and international transactions) set forth in this

Master Agreement shall be the maximum fees Contractor may charge during the term of the Master Agreement.

3.5. MASTER AGREEMENT INFORMATION. Enterprise Services shall maintain and provide information regarding this Master Agreement, including scope and pricing, to the eligible Participating Entities.

4. CONTRACTOR REPRESENTATIONS AND WARRANTIES. Contractor makes each of the following representations and warranties as of the effective date of this Master Agreement and at the time any Card User Agreement (CUA) is placed pursuant to this Master Agreement and Participating Addendum. If, at the time of any such agreement, Contractor cannot make such representations and warranties, the Contractor shall not process any additional CUA and shall notify Enterprise Services, in writing, of such breach as soon as commercially reasonable but, in no event, later than ten (10) days after Contractor has knowledge of any such breach.

4.1. QUALIFIED TO DO BUSINESS. Contractor represents and warrants that it is in good standing and qualified to do business in the State of Washington and that, if required to by law, it will register with the Washington State Department of Revenue and the Washington Secretary of State, that it possesses and shall keep current all required licenses and/or approvals, and that it is current, in full compliance, and has paid all applicable taxes owed to the State of Washington. Contractor further represents and warrants that it will do the equivalent, to the extent required, for any Participating State for which it executes a Participating Addendum.

4.2. SUSPENSION & DEBARMENT. Contractor represents and warrants that neither it nor its principals or affiliates presently are debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in any governmental contract by any governmental department or agency within the United States.

4.3. WAGE VIOLATIONS. Contractor represents and warrants that, during the term of this Master Agreement and the three (3) year period immediately preceding the award of the Master Agreement, it is not determined, by a final and binding citation and notice of assessment issued by the Washington Department of Labor and Industries or through a civil judgment entered by a court of limited or general jurisdiction, to be in willful violation of any provision of Washington state wage laws set forth in RCW chapters 49.46, 49.48, or 49.52.

4.4. PAY EQUALITY. Contractor represents and warrants that, among its workers, similarly employed individuals are compensated as equals. For purposes of this provision, employees are similarly employed if the individuals work for the same employer, the performance of the job requires comparable skill, effort, and responsibility, and the jobs are performed under similar working conditions. Job titles alone are not determinative of whether employees are similarly employed. Contractor may allow differentials in compensation for its workers based in good faith on any of the following: a seniority system; a merit system; a system that measures earnings by quantity or quality of production; a bona fide job-related factor or factors; or a bona fide regional difference in compensation levels. A bona fide job-related factor or factors may include, but not be limited to, education, training, or experience, that is: consistent with business necessity; not based on or derived from a gender-based differential; and accounts for the entire differential. A bona fide regional difference in compensation level must be consistent with business necessity; not based on or derived from a gender-based differential; and account for the entire differential. Notwithstanding any provision to the contrary, upon breach of warranty and Contractor's failure to provide satisfactory evidence of compliance within thirty (30) days, Enterprise Services may suspend or terminate this Master Agreement and any Participating Entity hereunder similarly may suspend

or terminate its use of the Master Agreement and/or any Participating Addendum entered into pursuant to the Master Agreement.

4.5. EXECUTIVE ORDER 18-03 WORKERS' RIGHTS (MANDATORY INDIVIDUAL ARBITRATION). Contractor represents and warrants, as previously certified in Contractors bid submission, that Contractor does NOT require its employees, as a condition of employment, to sign or agree to mandatory individual arbitration clauses or class or collective action waivers. Contractor further represents and warrants that, during the term of this Master Agreement, Contractor shall not, as a condition of employment, require its employees to sign or agree to mandatory individual arbitration clauses or class or collective action waivers.

4.6. INTENTIONALLY DELETED.

4.7. INTENTIONALLY DELETED.

4.8. QUALITY OF GOODS AND SERVICES. Contractor represents and warrants that any goods and services provided pursuant to this Master Agreement, shall conform to this Master Agreement and Cardholder User Agreement, and shall be provided in full compliance with applicable law.

4.9. NO EFFECT OF ADDITIONAL TERMS AND CONDITIONS. Other than the terms and conditions listed in *Exhibit E - WEX Forms and Specific Terms & Conditions*, attached hereto, the terms of which shall govern the parties' relationship with respect to the relevant subject matter, Contractor represents and warrants that any Authorized Users agreement to "click through" or other terms and conditions shall not be binding and shall have no force or effect as to the Services of this Master Agreement or Participating Addendum, unless agreed to in writing between the parties. Without prejudice to first sentence of this Section 4.9, the parties agree that the terms and conditions listed in Exhibit E do not modify, amend or change the Master Agreement in any way and if there is a conflict between Master Agreement and any of the terms in Exhibit E, Master Agreement will govern. The parties agree that the "WEX Click Through Agreement" as set forth in Exhibit E shall apply with respect to any Purchasing Entity's use of the WEX website, notwithstanding anything to the contrary in the click-through terms and conditions that any Purchasing Entity shall click to approve in order to access such website.

4.10. PROCUREMENT ETHICS & PROHIBITION ON GIFTS. Contractor represents and warrants that it complies fully with all applicable procurement ethics restrictions including, but not limited to, restrictions against Contractor providing gifts or anything of economic value, directly or indirectly, to Participating Entity's employees. Contractor further represents and warrants that it will do the equivalent for any Participating State for which it executes a Participating Addendum.

4.11. WASHINGTON'S ELECTRONIC BUSINESS SOLUTION (WEBS). Contractor represents and warrants that it is registered in Washington's Electronic Business Solution (WEBS), Washington's contract registration system and that, all of its information therein is current and accurate and that throughout the term of this Master Agreement, Contractor shall maintain an accurate profile in WEBS.

4.12. STATEWIDE PAYEE DESK. Contractor represents and warrants that, prior to conducting any transactions under this Master Agreement, Contractor will register with Washington's Statewide Payee Desk, which registration is a condition to invoice payment for the State of Washington.

4.13. MASTER AGREEMENT PROMOTION; ADVERTISING AND ENDORSEMENT. Contractor represents and warrants that it shall use commercially reasonable efforts both to promote and market the use of this Master Agreement with eligible Participating Entities and ensure that those entities that utilize this Master Agreement are eligible Participating Entities. Contractor understands and acknowledges that neither Enterprise Services nor any Participating Entity are endorsing Contractor's goods and/or

services or suggesting that such goods and/or services are the best or only solution to their needs. Accordingly, Contractor represents and warrants that it shall make no reference to Enterprise Services, the State of Washington, or any Participating or Purchasing Entity in any promotional material without the prior written consent of Enterprise Services.

4.14. MASTER AGREEMENT TRANSITION. Contractor covenant that, in the event this Master Agreement or a similar contract, is transitioned to another contractor (e.g., Master Agreement expiration or termination), Contractor shall use commercially reasonable efforts to assist Enterprise Services for a period of nine (9) months to effectuate a smooth transition to another contractor to minimize disruption of service and/or costs to the State of Washington and all other Participating Entities.

5. USING THE MASTER AGREEMENT – ESTABLISHING A CARD USER AGREEMENT.

5.1. ESTABLISHING A CARD USER AGREEMENT (CUA). Purchasing Entities shall establish a Card User Agreement as described in Exhibit D or as modified by the Participating State's Participating Addendum in order to receive cards, establish access to the online system, and leverage any other goods and services from this Master Agreement.

5.2. EXTENSION OF CREDIT. Contractor in its sole discretion extends credit and establishes accounts for Purchasing Entities. Contractor may research the financial condition of any Purchasing Entity. If requested, Purchasing Entity agrees to furnish Contractor copies of its official and finalized financial statements or other applicable financial information no later than 120 days following the end of each of its fiscal years. The financial statements shall have been prepared, consistently year over year and shall be in accordance with the books and records of Purchasing Entity. Any financial information submitted shall be kept strictly confidential by Contractor.

(a) Purchasing Entities or any other entity or individual authorized by a Purchasing Entity to use an account opened pursuant to this Master Agreement or, as applicable, a Participating Addendum, or cards issued by Contractor pursuant to this Master Agreement or, as applicable, a Participating Addendum (each such entity or individual an "Account User") can make purchases up to the credit limit that is assigned by Contractor. The credit limit appears on the billing statement and can be monitored via WEXOnline®. Each Purchasing Entity shall not to exceed its credit limit. Contractor may change the credit limit without prior notice. Contractor will use its best efforts to provide advance notice of any changes to the credit limit. If Contractor is unable to provide advance notice, Purchasing Entity will receive notification promptly following any such change. If Contractor has previously permitted Participating Entity to exceed its credit limit, it does not mean that Contractor will permit Participating Entity to exceed its credit limit again.

(b) Contractor may suspend an account or refuse to authorize any transaction in its sole discretion and specifically in the event that: (i) any balance is past due more than 60 days (Purchasing Entity are contacted by WEX strategic receivables team prior to suspension. Should the authorized contact not respond, WEX strategic receivables will notify the Purchasing Entity's WEX premium fleet account manager to escalate concern to other contacts within that Purchasing Entity); and/or (ii) the amount of the transaction plus the outstanding balance (including transactions authorized but not yet posted) exceeds the credit limit. Contractor shall notify the Purchasing Entity prior to account suspension for past due balances or exceeding credit limits. Each Purchasing Entity shall, immediately upon request, pay the amount over the limit and any associated fees or the

entire balance due on the account. Nothing contained in this Master Agreement prevents Purchasing Entity or an Account User from requesting a modification of the credit limit.

5.3. ACCOUNTS AND ACCOUNT USERS.

(a) Purchasing Entity shall designate its Account Users as well as those contacts authorized to: (i) provide Contractor with the information necessary to establish and maintain Account(s), Cards, and DINs; (ii) provide vehicle, driver and other information; (iii) receive all Account numbers, Cards or reports; (iv) receive other Account information; and (v) select additional products and/or services that may be offered. Purchasing Entity will provide notice of any change or removal of any contact or Account User either in writing, by telephoning Contractor's customer service department or through Contractor's online system. Purchasing Entity remains liable for any unauthorized use until Contractor receives notice of any change in or removal of any Account User or contact. Contractor is authorized to take instruction from any Account User or contact with apparent authority to act on Purchasing Entity's behalf. Unless Purchasing Entity reports any errors in Account information or Cards, Contractor is entitled to rely on that information for servicing the Account.

(b) Purchasing Entity is responsible for notifying Contractor of any revocation of any Account User's authority and Purchasing Entity shall remain liable for any charges made by an Account User until notice of revocation of authority is received by Contractor. Purchasing Entity agrees that use of a Card and the applicable DIN is deemed authorized use of the Account. Purchasing Entity assumes all risk if Purchasing Entity chooses to leave a Card at an accepting location for use by its drivers or Account Users and as such, agrees to pay for all charges made with that Card or on that Account. Purchasing Entity agrees to keep DINs confidential and to provide for its employees or Account Users to not disclose any DIN. If Account Users or other employees disclose a DIN or write a DIN on a Card, then Purchasing Entity is liable for any fraudulent use that may result even if the disclosure is inadvertent or unintentional.

(c) All Cards will be valid through the expiration date listed on the Card. Participating Entity will automatically receive new Cards prior to the expiration date of their current Cards. Standard delivery time for renewal cards is 30 to 45 days prior to the card expiration. Purchasing Entity's may request an earlier renewal timeframe if necessary.

(d) Accounts and Cards will only be used for the purchase of products and services for business or commercial purposes and not for personal, family or household purposes. Purchasing Entity shall adopt internal policies and controls to ensure that the Accounts and Cards are used strictly for business or commercial purposes. Purchases of lottery tickets or other games of chance, gift cards, pre-paid cards or other cash equivalent charges are prohibited. Purchasing Entity agrees that Purchasing Entity's use of Cards or Accounts is deemed acceptance by Purchasing Entity of this Agreement's terms.

(e) Contractor is not responsible in the event a merchant does not accept or honor a Card or Account number as payment.

5.4. DISPUTED AMOUNTS.

(a) Purchasing Entity shall use its best efforts to resolve purchase disputes directly with the relevant merchant particularly such disputes arising out of quality or warranty issues.

(b) "During dispute a temporary or permanent credit may be placed on Purchasing Entity's account. All disputed items must be submitted in writing within sixty (60) days from the billing date or they will be final and binding. Purchasing Entity may dispute an amount reflected on a billing statement if: (i) the amount does not reflect the face value of the Transaction; (ii) the amount being disputed is a fee that is not properly accrued under this Agreement; or (iii) Purchasing Entity does not believe it is liable for that amount. Dispute credits and temporary credits shall be issued to a Purchasing Entity's account within the billing cycle in which the dispute is identified, reported to and processed by the Contractor. For disputes occurring within a billing cycle, the total amount due on the invoice shall be reduced by the amount in dispute. For disputes occurring after the relevant billing cycle has closed, where an invoice has been created, the permanent or temporary credit shall be reflected on the subsequent billing cycle's invoice. Purchasing Entities shall pay the exact amount due set forth on each invoice."

(c) Transactions made at an island card reader where the Purchasing Entity or Account User did not obtain a receipt at the time of sale are eligible for dispute. However, the receipt may provide the only opposing record to the transaction information submitted by the merchant. It is also important to note that island card reader transactions require both a valid card and DID to be authorized.

(d) Transactions in dispute may qualify for charge back to the merchant. Contractor shall attempt to charge the Transaction back to the merchant in accordance with its procedures under its merchant acceptance agreements. Any accepted charge back will be credited to the relevant Account. The Purchasing Entity may be liable for the Transaction if the disputed item is found to be no fault of the merchant and therefore cannot be charged back to the merchant.

5.5. NOTICE OF LOSS, THEFT OR UNAUTHORIZED USE. In the event that Purchasing Entity or an Account User knows of or suspects the loss, theft or possible unauthorized use of a Card or Account or if Purchasing Entity would like to terminate an Account User, Contractor must be immediately notified by calling 1-800-492-0669.

5.6. CONTROLS. Purchasing Entity may request that Controls be applied to its Account(s).

5.7. UNAUTHORIZED USE AND UNAUTHORIZED TRANSACTIONS.

(a) The availability and effectiveness of Controls is dependent upon each merchant's adoption of card specifications and the information, including product codes that the merchant transmits to Contractor. The product codes are assigned by each merchant and not by the Contractor. In addition, some Controls are not enforceable at island card readers due to equipment restrictions at the merchant location.

(b) Default Control values are only assigned by Participating Entity through the online product. More detailed information related to Controls and their limitations is available online. Contractor is not responsible for the prudence of any particular Control level selected by Participating Entity. Contractor shall use reasonable efforts to deny requests for Transaction authorizations that fall outside the selected Control parameters. Purchasing Entity remains responsible for payment in full of Transactions

which fall outside of the Control parameters selected, if such Transactions are made with a valid Card and are processed by Contractor. The existence and/or use of Controls will not affect Purchasing Entity's liability for Unauthorized Transactions in certain circumstances and is more fully described in the guidance information provided when Purchasing Entities make Control elections. Only transactions submitted for authorization are subject to Controls and those Controls can only be enforced when the merchant provides sufficient information as part of the authorization.

(c) Contractor may, in its sole discretion and/or without prior notice, modify Authorization Controls for the purpose of the prevention of suspected fraudulent activity, see Exhibit G Section 15 Fraud Protection. Contractor will notify Purchasing Entity after any modification is made. Purchasing Entity agrees it is responsible for reviewing fraud control data provided by Contractor for the purpose of detecting fraud that may occur within Control parameters.

5.8. REPORTS AND OTHER PRODUCT FEATURES.

(a) Contractor provides transaction data for each Account to the Purchasing Entity as transmitted by merchants. Purchasing Entity is responsible for reconciling that data. Contractor will report the data received from merchants and as such is not liable for accuracy or completeness of the data received, posted or contained in any specialty reports, management reports, data services or other information services provided. In addition, Purchasing Entity understands that in the event an error is identified in a report, such as incorrect product code, Purchasing Entity is still liable for the Transaction, but may follow the dispute process to obtain clarifying information.

(b) Except as otherwise expressly provided below, Purchasing Entity will be liable to Contractor for all unauthorized use or Unauthorized Transactions that occur: (i) when a Card is lost or stolen, for the period prior to which a Purchasing Entity gives notice to Contractor as provided in this Agreement; (ii) if such use or suspected use occurs as a result of the Purchasing Entity's lack of reasonable security precautions and controls surrounding the Cards or Accounts as described in this Agreement; or (iii) if such use results in a benefit, directly or indirectly, to the Purchasing Entity or Account User. Misuse as defined by Purchasing Entity internal Purchasing Entity policy by an Account User or other employee does not constitute fraud, unauthorized use, or an Unauthorized Transaction.

(c) Purchasing Entity may purchase dyed special fuel using its Account or Cards. Purchasing Entity acknowledges that all dyed special fuel purchases will be used exclusively for off-road purposes and according to all applicable laws governing its use. Contractor is not liable in any way for any misuse or mishandling by Purchasing Entity of any dyed special fuel. Upon request from applicable governmental authorities, Contractor may provide information regarding Participating Entity's dyed special fuel purchases without prior authorization from Purchasing Entity.

5.9. DELIVERY REQUIREMENTS. Contractor must ensure that delivery of goods and/or services will be made as required by this Master Agreement, the Participating Addendum or as otherwise mutually agreed in writing between the Purchasing Entity and Contractor.

(a) On-Site Requirements. Contractor, its agents, employees, or subcontractors shall comply, in all respects, with Purchasing Entity's physical, fire, access, safety, or other security requirements required by any Participating State or Purchaser Entity while on their

premises. Purchase Entities shall clearly communicate any such requirements to Contactor in the event Contractor is on their premises.

5.10. INTERNATIONAL USE OF CARDS/CURRENCY CONVERSION.

(a) Cards are issued for use by Purchasing Entity's United States based operations, but may be used in Canada. Purchasing Entity may not distribute Cards to employees based in countries other than the United States. If Cards are used in any other country other than the United States, Purchasing Entity will: (i) be billed in US Dollars; and (ii) receive reporting in English.

(b) Contractor will convert any purchase made in a foreign currency into a U.S. Dollar amount before the Transaction is posted to the Account. The exchange rate between the Transaction currency (the foreign currency) and the billing currency (U.S. Dollars) used for processing international Transactions is a rate selected by Contractor using rates available from the Oanda Index for the date that the Transaction is posted by Contractor, which rate may vary from the rate Contractor itself receives, or the government mandated rate in effect at that time.

6. STATEMENTS & PAYMENT.

6.1. CONTRACTOR STATEMENT. Contractor shall submit to Purchasing Entity's designated statement contact properly itemized account statements on a monthly basis. Such statements shall itemize the following:

(a) Master Agreement No. 00819

(b) Participating Addendum No.

(c) Contractor name, address, telephone number, and email address for billing issues (i.e., Contractor Purchasing Entity Service Representative)

(d) Contractor's Federal Tax Identification Number

(e) Statement amount; and

(f) Payment terms, including any available prompt payment discounts.

Statements will not be processed for payment until receipt of a complete statement as specified herein.

6.2. PAYMENT.

(a) Payment is the sole responsibility of, and will be made by, the Purchasing Entity. Payment is due in full within the earlier of (a) forty-five (45) days of statement or (b) the date required pursuant to the applicable Participating Entity's prompt pay act or similar legislation, in each case on or before the relevant cutoff time on or before the Due Date. If Purchasing Entity fails to make timely payment(s) (i.e., by the applicable Due Date) in full, such failure shall constitute a "Payment Default." "Due Date" means the date on which the repayment of the balance of the account is due as provided on a billing statement. In the event of a Payment Default, Contractor may invoice in the amount of up to one percent (1%) per month on the amount overdue or a minimum of $1 (or as otherwise agreed in the applicable Participating Addendum) (the "Late Fee"). The Late Fee will be applied to the Total Outstanding Balance (as defined below) on the Calculation Date, not to exceed the amount allowable by applicable law]. The "Calculation Date" is the earlier of (a) the posting date for the Purchasing Entity's payment in full of the invoiced amount to its account, or (b) the last day of the Billing Cycle during which the Payment Default occurred.

The "Total Outstanding Balance" is the invoiced amount, plus the amount of any unbilled transactions delivered by a merchant to Contractor, and minus any credits that have posted to the account, through the Calculation Date.

(b) Each Purchasing Entity shall be liable for all Transactions on the account to the fullest extent permitted by applicable law, except as expressly provided in this Agreement. Purchasing Entities may pay the entire balance of the account or a portion of it, at any time prior to its Due Date without penalty.

(c) Payments made via paper check are posted to the account after processing and must arrive at Contractor at least three Business Days before the Due Date on the billing statement. It can take up to three Business Days to process a check from the time the envelope containing a check arrives at Contractor's facility to posting of the check amount to the account.

(d) For payments not made by paper check, payments on a Business Day before the cut-off time (the "Cut-off Time") will be posted on that Business Day. Payments after the Cut-off Time on a Business Day, or on a day other than a Business Day, will be posted on the following Business Day. The Cut-off Times for payments not made by check are as follows: a payment transaction made via Contractor's online payment portal must be completed by 3:00 p.m. ET; a payment transaction made via IVR must be completed by 3:00 p.m. ET; and a payment transaction made via ACH must arrive to Contractor by 3:00 p.m. ET.

(e) Regardless of payment method, each Purchasing Entity must ensure that Purchasing Entity's account number is provided with the payment. Failure to do so will cause processing delays in posting the payment to the account. Payments that are received at locations other than the address specified on the billing statement, or that do not otherwise comply with instructions on the billing statement or this Master Agreement, may be delayed in posting.

(f) Each Purchasing Entity shall: (i) pay all fees set forth herein; (ii) pay all amounts payable for transactions on each card issued by Contractor, and (iii) perform all obligations, covenants, and warranties in this Master Agreement.

(g) Payments will be applied first to unpaid Late Fees and then to any unpaid balances. Each Participating Entity may pay their account balance or a portion of it, at any time prior to its due date without penalty.

6.3. OVERPAYMENTS. Contractor promptly shall refund to Purchasing Entity the full amount of any erroneous payment or overpayment. Such refunds shall occur promptly upon discovery by Contractor or within thirty (30) days of written notice to Contractor; *Provided*, however, that Purchasing Entity shall have the right to elect to have either direct payments or written credit memos issued. If Contractor fails to make timely payment(s) or issuance of such credit memos, Purchasing Entity may impose a one percent (1%) per month on the amount overdue thirty (30) days after notice to the Contractor.

6.4. NO ADDITIONAL CHARGES. Unless otherwise specified herein, Contractor shall not include or impose any additional charges including, but not limited to, charges for shipping, handling, or payment processing.

6.5. TAXES/FEES. Contractor promptly shall pay all applicable taxes on its operations and activities pertaining to this Master Agreement.

7. MASTER AGREEMENT MANAGEMENT.

7.1. MASTER AGREEMENT ADMINISTRATION & NOTICES. Except for legal notices, the parties hereby designate the following administrators as the respective single points of contact for purposes of this Master Agreement. Enterprise Services' contract administrator shall provide Master Agreement oversight. Contractor's contract administrator shall be Contractor's principal contact for business activities under this Master Agreement. The parties may change contractor administrators by written notice as set forth below.

Any notices required or desired shall be in writing and sent by U.S. mail, postage prepaid, or sent via email, and shall be sent to the respective addressee at the respective address or email address set forth below or to such other address or email address as the parties may specify in writing:

Enterprise Services	**Contractor**
Attn: WA Dept. of Enterprise Services PO Box 41411 Olympia, WA 98504-1411 Tel: (360) 407-2218 Email: DESContractsTeamCypress@des.wa.gov	Attn: Ryan Kelly WEX Inc. – North American Fleet 1 Hancock Street Portland, ME 04101 Tel: (952)-922-1104 Email: ryan.kelly@wexinc.com

Notices shall be deemed effective upon the earlier of receipt, if mailed, or, if emailed, upon transmission to the designated email address of said addressee.

7.2. CONTRACTOR RELATIONSHIP MANAGER. In each Participating Addendum, Contractor shall designate a Relationship Manager who shall be responsible for addressing Purchasing Entity issues pertaining to this Master Agreement and Participating Addendum. Notwithstanding any provision to the contrary, Contractor agrees that upon written notice from Participating State it shall collaborate with such State to transition the Relationship Manager duties to an alternative representative so as to achieve the mutually beneficial relationship intended by this Master Agreement.

7.3. ACCOUNT COORDINATOR. In each Participating Addendum, Contractor shall designate an Account Coordinator who shall be responsible for addressing Purchasing Entity issues pertaining to this Master Agreement and Participating Addendum. Notwithstanding any provision to the contrary, Contractor agrees that upon written notice from Participating State it shall collaborate with such State to transition the Account Coordinator duties to an alternative representative so as to achieve the mutually beneficial relationship intended by this Master Agreement.

7.4. LEGAL NOTICES. Any legal notices required or desired shall be in writing and delivered by U.S. certified mail, return receipt requested, postage prepaid, or sent via email, and shall be sent to the respective addressee at the respective address or email address set forth below or to such other address or email address as the parties may specify in writing:

Enterprise Services
Attn: Legal Services Manager
Washington Dept. of Enterprise Services
PO Box 41411
Olympia, WA 98504-1411

Contractor
Attn: Gabriel Weiss
Legal Director, North American Fleet
1 Hancock Street
Portland, ME 04101

Email: greg.tolbert@des.wa.gov Email: gabriel.weiss@wexinc.com

Notices shall be deemed effective upon the earlier of receipt when delivered, or, if mailed, upon return receipt, or, if emailed, upon transmission to the designated email address of said addressee.

8. CONTRACTOR SALES REPORTING; ADMINISTRATIVE FEE; & CONTRACTOR REPORTS.

8.1. NASPO VALUEPOINT ADMINISTRATIVE FEE. Contractor shall pay to NASPO ValuePoint, or its assignee, a NASPO ValuePoint Administrative Fee of one-quarter (1/4 or 25%) of one basis point (0.0025% or 0.000025) of the National Annual Volume no later than sixty (60) days following the end of the calendar year. The NASPO ValuePoint administrative fee is not negotiable. This fee may not be adjusted in any Participating Addendum. This fee is to be included as part of the pricing submitted with the bid.

8.2. PARTICIPATING STATE ADMINISTRATIVE FEE. Some states may require an additional fee be paid directly to the state only on PURCHASES made by Purchasing Entities within that state. The fee level, payment method and schedule for such reports and payments will be incorporated into the Participating Addendum that is made a part of the Master Agreement. The Contractor may adjust the Master Agreement pricing accordingly for purchases made by Purchasing Entities within the jurisdiction of the state. All such agreements shall not affect the NASPO ValuePoint Administrative Fee percentage or the prices paid by the Purchasing Entities outside the jurisdiction of the state requesting the additional fee. The NASPO ValuePoint Administrative Fee set forth above shall be based on the gross amount of all sales (less any charges for taxes or shipping) at the adjusted prices (if any) in Participating Addenda**.**

9. NASPO VALUEPOINT SUMMARY AND DETAILED USAGE REPORTS. In addition to other reports that may be required by the Master Agreement, Contractor shall provide the following NASPO ValuePoint reports.

9.1. SUMMARY SALES DATA. Contractor shall submit quarterly sales reports directly to NASPO ValuePoint using the NASPO ValuePoint Quarterly Sales/Administrative Fee Reporting Tool found at https://calculator.naspovaluepoint.org. Any/all sales made under this Master Agreement shall be reported as cumulative totals by state. Even if Contractor experiences zeros sales during a calendar quarter, a report is still required. Reports shall be due no later than thirty (30) days following the end of the calendar quarter (as specified in the reporting tool).

9.2. DETAILED SALES DATA.

Contractor also shall report the following detailed sales data elements:

1. Portfolio Name
2. Year
3. Quarter
4. Vendor Name
5. Vendor Contract Number
6. Customer Name
7. Customer Number
8. Customer Type (State Government, K12 Education, Higher Education, Local Government, NonProfit, Other)
9. Customer Address
10. Customer City
11. Customer State
12. Customer Zip
13. Transaction Date

14. Transaction Amount

Reports are due on a quarterly basis and must be received by Enterprise Services and NASPO ValuePoint no later than thirty (30) days after the end of the reporting period. Reports shall be delivered to Enterprise Services and to NASPO ValuePoint electronically through a designated portal or other method as determined by Enterprise Services and NASPO ValuePoint. Detailed sales data reports shall include sales information for all sales under participating addenda executed under this Master Agreement. The file format for the detailed sales data report shall be CSV or XLSX. A template shall be provided by NASPO ValuePoint to Contractor.

9.3. NATIONAL ANNUAL SALES INCENTIVE REPORT. Contractor shall provide the NASPO ValuePoint Cooperative Development Coordinator and Enterprise Services Contract Administrator with a National Annual Sales Volume Incentive Report reflecting each State's total annual spend, National Annual Volume Rebate earned no later than thirty (30) days after the end of the calendar year.

9.4. NASPO VALUEPOINT EXECUTIVE SUMMARY. Contractor shall provide NASPO ValuePoint an executive summary each quarter that includes, at a minimum, a list of states with an active Participating Addendum, states that Contractor is in negotiations with and any Participating Addendum roll out or implementation activities and issues. NASPO ValuePoint and Contractor will determine the format and content of the executive summary. The executive summary is due thirty (30) days after the conclusion of each calendar quarter.

9.5. REPORT OWNERSHIP. Timely submission of these reports is a material requirement of the Master Agreement. Enterprise Services and NASPO ValuePoint shall have a perpetual, irrevocable, non-exclusive, royalty free, transferable right to display, modify, copy and otherwise use reports, data and information provided under this section.

9.6. CONFIDENTIALITY OF DETAILED SALES DATA AND PARTICIPATING ADDENDA.

(a) Participating Addenda, as well as transaction data relating to purchases under this Master Agreement that identify the entity, transaction dates, line item descriptions and volumes, and prices/rates, shall be Confidential Information. Except as required by law, Contractor shall hold Confidential Information in confidence and shall not transfer or otherwise disclose Confidential Information to third parties or use Confidential Information for any purposes whatsoever other than what is necessary to the performance of purchase transactions under this Master Agreement. Contractor shall advise each of its employees and agents of their obligations to keep Confidential Information confidential. This provision does not apply to disclosure to the Lead State, a Participating State or any governmental entity exercising an audit, inspection, or examination pursuant to this Master Agreement. To the extent permitted by law, Contractor shall notify the Lead State of the identity of any entity seeking access to the Confidential Information described in this subsection.

(b) Contractor shall use and disclose Data solely and exclusively for the purpose of providing the services; and not use, sell, rent, transfer, distribute, or otherwise disclose or make available Data for Contractor's own purposes or for the benefit of anyone other than the Participating Entity without their prior written consent.

10. NASPO VALUEPOINT COOPERATIVE PROGRAM MARKETING AND PERFORMANCE REVIEW.

10.1. NASPO VALUEPOINT COOPERATIVE PROGRAM. Contractor agrees to work cooperatively with NASPO ValuePoint personnel. Contractor agrees to present plans to NASPO ValuePoint for the education of Contractor's contract administrator(s) and sales/marketing workforce regarding the Master Agreement, including the competitive nature of NASPO ValuePoint procurements, the Master Agreement and Participating addendum process, and the manner in which qualifying entities can participate in the Master Agreement.

10.2. LOGOS. NASPO ValuePoint logos may not be used by the Contractor in sales and marketing until a logo use agreement is executed with NASPO ValuePoint.

10.3. ANNUAL CONTRACT REVIEW. Contractor agrees to participate in an annual contract performance review at a location selected by Enterprise Services and NASPO ValuePoint, which may include a discussion of marketing action plans, target strategies, marketing materials, as well as Contractor reporting and timeliness of payment of administration fees.

11. RECORDS RETENTION & AUDITS.

11.1. RECORDS RETENTION. Contractor shall maintain books, records, documents, and other evidence pertaining to this Master Agreement and Card User Agreements (CUA) entered into by Participating or Purchasing Entities under it to the extent and in such detail as shall adequately reflect performance and administration of payments and fees. Contractor shall retain such records for a period of six (6) years following expiration or termination of this Master Agreement or final payment for any order placed by a Participating or Purchasing Entity against this Master Agreement, whichever is later; *Provided*, however, that if any litigation, claim, or audit is commenced prior to the expiration of this period, such period shall extend until all such litigation, claims, or audits have been resolved.

11.2. AUDIT**.** Enterprise Services reserves the right to audit, or have a designated third party audit, applicable records to ensure that Contractor has properly issued the Purchasing Entity the applicable rebate/incentive share. Accordingly, no more than once per calendar year (or more frequently to the extent agreed between the parties), upon advance written notice of no fewer than 60 days from Enterprise Services, Contractor shall permit Enterprise Services, any Participating or Purchasing Entity, and any other duly authorized agent of a governmental agency, to audit, inspect, examine, copy and/or transcribe Contractor's books, documents, papers and records directly pertinent to this Master Agreement or agreements entered into by Participating and/or Purchasing Entities under it for the purpose of making audits, examinations, excerpts, and transcriptions. This right shall survive for a period of six (6) years following expiration or termination of this Master Agreement or final payment for any account under this Master Agreement, whichever is later; *Provided*, however, that if any litigation, claim, or audit is commenced prior to the expiration of this period, such period shall extend until all such litigation, claims, or audits have been resolved.

11.3. OVERPAYMENT OF PURCHASES OR UNDERPAYMENT OF FEES. Without limiting any other remedy available to any Participating or Purchasing Entity, Contractor shall (a) reimburse Participating or Purchasing Entity for any overpayments inconsistent with the terms of this Master Agreement, at a rate of 100% of such overpayments, found as a result of the examination of the Contractor's records; and (b) reimburse Purchasing Entity for any underpayment of fees, at a rate of 100% of such fees found as a result of the examination of the Contractor's records.

Underpayment of Rebate/Incentive Share. Without limiting any other remedy available to any Participating or Purchasing Entity, in the event of a material underpayment of the Rebate/Incentive Share, in addition to compensating such Participating or Purchasing Entity for the deficiency, Contractor shall reimburse such Participating or Purchasing Entity for its reasonable out-of-pocket

expenses incurred to discover and calculate the amount of such deficiency, or 25% of the amount of the deficiency, whichever is less, up to a maximum of $15,000 per calendar year.

12. INSURANCE.

12.1. REQUIRED INSURANCE. DURING the term of this Master Agreement, Contractor, at its expense, shall maintain in full force and effect the insurance coverages set forth in *Exhibit C – Insurance Requirements*.

12.2. WORKERS COMPENSATION. Contractor shall comply with applicable workers compensation statutes and regulations (e.g., RCW Title 51, Industrial Insurance). If Contractor fails to provide industrial insurance coverage or fails to pay premiums or penalties on behalf of its employees as may be required by law, Enterprise Services may terminate this Master Agreement. This provision does not waive any of the Washington State Department of Labor and Industries (L&I) rights to collect from Contractor. In addition, Contractor waives its immunity under RCW Title 51 to the extent it is required to indemnify, defend, and hold harmless the State of Washington and its agencies, officials, agents, or employees.

12.3. INSURANCE CERTIFICATE. Prior to commencement of performance, Contractor shall provide to Enterprise Services a written endorsement to the Contractor's general liability insurance policy or other documentation evidence acceptable to the Lead State that (1) names the Participating States identified in the Competitive Solicitation as additional insureds, (2) provides for written notice of cancellation shall be delivered in accordance with the policy provisions, and (3) provides that the Contractor's liability insurance policy shall be primary, with any liability insurance of any Participating State as secondary and noncontributory. Unless otherwise agreed in any Participating Addendum, other Participating States' rights and Contractor's obligations are the same as those specified in the first sentence of this subsection except the endorsement is provided to the applicable Participating State.

13. PUBLIC INFORMATION. This Master Agreement, all related documents, and all records created as a result of the Master Agreement are subject to public disclosure as required by Washington's Public Records Act, RCW chapter 42.56. In addition, Participating Addendums and related records shall be subject to public disclosure as required by applicable law pertaining to such Purchasing Entity. Consistent with the Public Records Act, to the extent that any such Contractor document or record – in whole or in part – includes information exempted or protected from disclosure by the Public Records Act, Contractor may mark such document or record – the exempted or protected portions only – with the specific basis for protection under the Public Records Act. In the event that Enterprise Services receives a public records disclosure request that pertains to such properly marked documents or records, Enterprise Services shall notify Contractor of such disclosure request and of the date that the records will be released to the requester unless Contractor, at Contractor's sole expense, timely obtains a court order enjoining such disclosure, Enterprise Services shall release the requested documents on the date specified. Contractor's failure properly to identify exempted or protected information or timely respond after notice of request for public disclosure has been given shall be deemed a waiver by Contractor of any claim that such materials are protected or exempt from disclosure.

14. CLAIMS.

14.1 ASSUMPTION OF RISKS; CLAIMS BETWEEN THE PARTIES. Contractor assumes sole responsibility and all risks of personal injury or property damage to itself and its employees, and agents in connection with Contractor's operations under this Master Agreement. Enterprise Services has made no representations regarding any factor affecting Contractor's risks. Contractor shall pay for all

damage to any Purchasing Entity's property resulting directly from its grossly negligent or fraudulent acts or omissions, or acts of willful misconduct under this Master Agreement.

14.2 THIRD-PARTY CLAIMS; INDEMNITY. Contractor shall defend, indemnify, and hold harmless Enterprise Services and any Purchasing Entity and their employees and agents from and against all claims, demands, judgments, assessments, damages, penalties, fines, costs, liabilities or losses including, without limitation, sums paid in settlement of claims, reasonable attorneys' fees, consultant fees, and expert fees (collectively "claims") directly arising from any grossly negligent act or omission, or willful misconduct, of Contractor or its agents and subcontractors under this Master Agreement, except claims caused solely by Enterprise Services or any Purchasing Entity's gross negligence. Contractor shall take all steps needed to keep Purchasing Entity's property free of liens arising from Contractor's activities, and promptly obtain or bond the release of any such liens that may be filed.

14.3 THIRD- PARTY CLAIMS; INDEMNITY - INTELLECTUAL PROPERTY. Contractor shall defend, indemnify and hold harmless Enterprise Services and any Purchasing Entity, along with their officers and employees, from and against claims, damages or causes of action brought against Enterprise Services or any Purchasing Entity including reasonable attorney fees and related costs arising out of the claim that Contractor's operations/products or their use, infringes Intellectual Property rights of any person or entity.

(a) The Contractor's obligations under this section shall not extend to any combination of the Product with any other product, system or method, unless the Product, system or method is:

i. Provided by the Contractor or the Contractor's subsidiaries or affiliates;

ii. Specified by the Contractor to work with the Product; or

iii. Reasonably required, in order to use the product in its intended manner, and in the infringement could not have been avoided by substituting another reasonably available product, system or method capable of performing the same function; or

iv. It would be reasonably expected to use the Product in combination with such product, system, or method.

(b) The indemnified party shall notify the Contractor within a reasonable time after receiving notice of an intellectual property claim. Even if the indemnified party fails to provide reasonable notice, the Contractor shall not be relieved from its obligations unless the Contractor was prejudiced in defending the intellectual property claim resulting in increased expenses or loss to the Contractor. If the Contractor promptly and reasonably investigates and defends any intellectual property claim, it shall have no control over the defense and settlement of it. However, the indemnified party must consent in writing for any money damages or obligations for which it may be responsible. The indemnified party shall furnish, at the Contractor's reasonable request and expense, information and assistance necessary for such defense. If the Contractor fails to vigorously pursue the defense or settlement of the intellectual property claim, the indemnified party may assume the defense or settlement of it and the Contractor shall be liable for all costs and expenses, including reasonable attorneys' fees and related costs, incurred by the indemnified party in the pursuit of the intellectual property claim. Unless otherwise agreed in writing, this section is not subject to any limitations of liability in this Master Agreement or in any other document executed in conjunction with this Master Agreement.

14.4 THIRD-PARTY CLAIMS; INDEMNITY: NASPO. Contractor's indemnity obligations set forth above shall extend to an obligation to defend, indemnify, and hold harmless, NASPO and NASPO ValuePoint) to the same extent as Enterprise Services and any Purchasing Entity.

15. DISPUTE RESOLUTION. The parties shall cooperate to resolve any dispute pertaining to this Master Agreement efficiently, as timely as practicable, and at the lowest possible level with authority to resolve such dispute. If, however, a dispute persists and cannot be resolved, it may be escalated within each organization. In such situation, upon notice by either party, each party, within five (5) business days shall reduce its description of the dispute to writing and deliver it to the other party. The receiving party then shall have three (3) business days to review and respond in writing. In the event that the parties cannot then agree on a resolution of the dispute, the parties shall schedule a conference between the respective senior manager of each organization to attempt to resolve the dispute. In the event the parties cannot agree, either party may resort to court to resolve the dispute. For the avoidance of doubt, this Section 15 shall not apply to disputed transactions, which shall be governed by Exhibit G Section 16.

16. DEFAULTS AND REMEDIES.

16.1 SUSPENSION & TERMINATION FOR DEFAULT BY CONTRACTOR. Enterprise Services may suspend Contractor's operations under this Master Agreement immediately by written cure notice of any default. Suspension shall continue until the default is remedied to Enterprise Services' reasonable satisfaction; *Provided*, however, that, if after thirty (30) days from such a suspension notice, Contractor remains in default, Enterprise Services may terminate Contractor's rights under this Master Agreement. In such event, except as otherwise set forth herein, each of the parties' obligations to each other survive termination of this Master Agreement, until such obligations have been fulfilled.

16.2 DEFAULT BY CONTRACTOR. Each OF the following events shall constitute default of this Master Agreement by Contractor:

(a) Contractor materially fails to perform or comply with any of the terms or conditions of this Master Agreement;

(b) Contractor breaches any representation or warranty provided herein; or

(c) Contractor enters into proceedings relating to bankruptcy, whether voluntary or involuntary.

16.3 REMEDIES FOR DEFAULT BY CONTRACTOR.

(a) Enterprise Services' rights to suspend and terminate Contractor's rights under this Master Agreement are in addition to all other available remedies.

(b) In the event of termination for default, Enterprise Services may exercise any remedy provided by law including, without limitation, the right to procure replacement goods and/or services. In such event, Contractor shall be liable to Enterprise Services for damages as set forth in this Master Agreement.

16.4 LIMITATION ON DAMAGES.

(a) Notwithstanding any provision to the contrary, the parties agree that in no event shall Contractor be liable to Enterprise Services or any Participating Entity for special, consequential, exemplary or punitive damages. Except as otherwise required under applicable law, Contractor makes no warranty with respect to goods, products, merchantability, or services purchased with a card or the account, or through Contractor. Contractor is not responsible for any failure of a merchant to accept a card issued by Contractor hereunder.

(b) Contractor's liability with respect to each Participating Entity under this Master Agreement for actual damages shall not exceed three times the sum of: (a) all fees paid by such Participating Entity to Contractor under this Agreement in the twelve (12) month period

prior to the date when any claim is made against Contractor; plus (b) all other revenue earned by Contractor for all of Enterprise Services' transactions made in the twelve (12) months prior to the date of any claim made against Contractor; provided, however, that in the case of claims (as such term is defined and limited pursuant to and in accordance with Sections 14.2 and 14.3) directly resulting from a data breach (i.e., any access, destruction, loss, theft, use or disclosure of Enterprise Services' Data by an unauthorized party), Contractor's liability with respect to each Participating Entity under this Master Agreement for such damages shall not exceed six times the sum of: (a) all fees paid by such Participating Entity to Contractor under this Agreement in the twelve (12) month period prior to the date when any claim is made against Contractor; plus (b) all other revenue earned by Contractor for all of Enterprise Services' transactions made in the twelve (12) months prior to the date of any claim made against Contractor.

16.5 GOVERNMENTAL TERMINATION.

(a) Termination for Withdrawal of Authority. Enterprise Services may suspend or terminate this Master Agreement if, during the term hereof, Enterprise Services' procurement authority is withdrawn, reduced, or limited such that Enterprise Services, in its judgment, would lack authority to enter into this Master Agreement; *Provided*, however, that such suspension or termination for withdrawal of authority shall only be effective upon twenty (20) days prior written notice; and *Provided further*, that such suspension or termination for withdrawal of authority shall not relieve any Participating Entity or Purchasing Entity from payment for purchases on account (and any related fees or other amounts owed to Contractor) as of the effective date of such notice. Except as stated in this provision, in the event of such suspension or termination for withdrawal of authority, neither Enterprise Services nor any Participating Entity or Purchasing Entity shall have any obligation or liability to Contractor.

(b) Termination for Public Convenience. Enterprise Services, for public convenience, may terminate this Master Agreement; *Provided*, however, that such termination for public convenience must, in Enterprise Services' judgment, be in the best interest of the State of Washington; and *Provided further*, that such termination for public convenience shall only be effective upon sixty (60) days prior written notice; and *Provided further*, that such termination for public convenience shall not relieve any Participating Entity or Purchasing Entity from payment for purchases on account (and any related fees or other amounts owed to Contractor) as of the effective date of such notice. Except as stated in this provision, in the event of such termination for public convenience, neither Enterprise Services nor any Participating Entity or Purchasing Entity shall have any obligation or liability to Contractor.

16.6 TERMINATION PROCEDURE. Regardless of basis, in the event of suspension or termination (in full or in part), the PARTIES shall cooperate to ensure an orderly and efficient suspension or termination. Unless directed by Enterprise Services to the contrary, Contractor shall not process any orders after notice of suspension or termination inconsistent therewith.

16.7 IF A PURCHASING ENTITY DEFAULTS: (i) it will not have any further right to borrow under the relevant PARTICIPATING Addendum; (ii) all outstanding amounts under the account shall be immediately due and payable; (iii) Contractor may terminate the relevant Purchasing Entity Cardholder Agreement; and (iv) Contractor will have the right to bring suit and exercise all rights and remedies available under applicable law. Alternatively, Contractor MAY, in its sole discretion: (i) suspend all services and obligations; (ii) shorten the billing cycle; or (iii) change the payment terms. The suspension of services and/or obligations will not be deemed a waiver of any right to terminate the Purchasing Entity Cardholder

Agreement, whether as a result of the default to which such suspension of services or obligations relates or otherwise. For purposes of this Section 16.7, "default" means if: (a) Purchasing Entity fails to perform any obligation hereunder or, as applicable, the Purchasing Entity Cardholder Agreement; (b) a representation or warranty by Purchasing Entity in connection with this Master Agreement or, as applicable, the Participating Addendum, was incorrect or misleading when made; (c) any petition in bankruptcy, insolvency, receivership, or reorganization or proceeding pursuant to any other debtor relief law is filed by or against Purchasing Entity; (d) any order is entered appointing a receiver, custodian, trustee, liquidator, or any other person with similar authority over the assets of Purchasing Entity; (e) there is an insolvency, dissolution, reorganization, or assignment for the benefit of creditors with respect to Purchasing Entity, or any other material adverse change in the financial condition of Purchasing Entity; or (f) any adverse judgment, order or award is entered against Purchasing Entity that has a material adverse impact on the financial condition of Purchasing Entity or a detrimental effect on the ability of Purchasing Entity to perform its obligations to Contractor.

17. GENERAL PROVISIONS.

17.1 TIME IS OF THE ESSENCE. Time is of the essence for each and every provision of this Master Agreement.

17.2 FORCE MAJEURE. Neither party to this Master Agreement shall be held responsible for delay or default caused by any unforeseeable acts of God including, but not limited to, fire, riot, unusually severe weather, epidemics or pandemics, or war which are beyond that party's reasonable control which said party provides written notice within three (3) calendar days to the other specifying such force majeure event and their detailed plan to resume normal operations; *Provided*, however, that, in the event Contractor declares force majeure, Enterprise Services shall have the right to terminate this Master Agreement if such force majeure event interferes, in Enterprise Services' judgment, with the successful performance of Contractor's obligations under this Master Agreement for more than thirty (30) days; *Provided further*, that this Section 17.2 shall not apply to Enterprise Services' or any Participating Entity's obligation to pay the balance on its account under this Master Agreement or, as applicable, any Participating Addendum.

17.3 COMPLIANCE WITH LAW. Each of the parties shall comply with all applicable law.

17.4 INTEGRATED AGREEMENT. This Master Agreement (including all exhibits, schedules and attachments hereto) constitutes the entire agreement and understanding of the parties with respect to the subject matter and supersedes all prior negotiations, representations, and understandings between them. There are no representations or understandings of any kind not set forth herein.

17.5 AMENDMENT OR MODIFICATION. Except as set forth herein, this Master Agreement may not be amended or modified except in writing and signed by a duly authorized representative of each party hereto.

17.6 AUTHORITY. Each party to this Master Agreement, and each individual signing on behalf of each party, hereby represents and warrants to the other that it has full power and authority to enter into this Master Agreement and that its execution, delivery, and performance of this Master Agreement has been fully authorized and approved, and that no further approvals or consents are required to bind such party.

17.7 NO AGENCY. The parties agree that no agency, partnership, or joint venture of any kind shall be or is intended to be created by or under this Master Agreement. Neither party is an agent of the other party nor authorized to obligate it.

17.8 ASSIGNMENT. Neither party may assign its rights under this Master Agreement without the other party's prior written consent and any attempted assignment without such consent to be void.

17.9 BINDING EFFECT; SUCCESSORS & ASSIGNS. This Master Agreement shall be binding upon and shall inure to the benefit of the parties hereto and their respective permitted successors and assigns.

17.10 ASSIGNMENT OF ANTITRUST RIGHTS REGARDING PURCHASED GOODS/SERVICES. Contractor irrevocably assigns to Enterprise Services, on behalf of the State of Washington, any claim for relief or cause of action which the Contractor now has or which may accrue to the Contractor in the future by reason of any violation of state or federal antitrust laws in connection with any goods and/or services provided in Washington for the purpose of carrying out the Contractor's obligations under this Master Agreement, including, at Enterprise Services' option, the right to control any such litigation on such claim for relief or cause of action. Contractor irrevocably assigns to a state Participating Entity outside the State of Washington any claim for relief or cause of action as described in this subsection, and the same right to control such litigation, in connection with any goods and/or services provided in the Participating Entity's state.

17.11 SEVERABILITY. If any provision of this Master Agreement is held to be invalid or unenforceable, such provision shall not affect or invalidate the remainder of this Master Agreement, and to this end, the provisions of this Master Agreement are declared to be severable. If such invalidity becomes known or apparent to the parties, the parties agree to negotiate promptly in good faith in an attempt to amend such provision as nearly as possible to be consistent with the intent of this Master Agreement.

17.12 WAIVER. Failure of either party to insist upon the strict performance of any of the terms and conditions hereof, or failure to exercise any rights or remedies provided herein or by law, or to notify the other party in the event of breach, shall not release the other party of any of its obligations under this Master Agreement, nor shall any purported oral modification or rescission of this Master Agreement by either party operate as a waiver of any of the terms hereof. No waiver by either party of any breach, default, or violation of any term, warranty, representation, contract, covenant, right, condition, or provision hereof shall constitute waiver of any subsequent breach, default, or violation of the same or other term, warranty, representation, contract, covenant, right, condition, or provision. Similarly, failure of any party to insist upon the strict performance of any of the terms and conditions of any Participating Addendum, or failure to exercise any rights or remedies provided therein or by law, or to notify the other party in the events of breach, shall not release such party of any of its obligations under such Participating Addendum, nor shall any purported oral modification or rescission of such by either party operate as a waiver of any such terms thereof.

17.13 SURVIVAL. All covenants, agreements, and indemnities set forth in or otherwise made pursuant to this Master Agreement shall survive and remain in effect following the expiration or termination of this Master Agreement, Provided, however, that nothing herein is intended to extend the survival beyond any applicable statute of limitations periods.

17.14 GOVERNING LAW. The validity, construction, performance, and enforcement of this Master Agreement shall be governed by and construed in accordance with the laws of the State of Washington, provided that 12 U.S.C. 1831d shall apply on the basis of the location of the Contractor, without regard to its choice of law rules. The validity, construction, and effect of any Participating Addendum pertaining to the Master Agreement or order placed pursuant to such Participating Addendum shall be governed by and construed in accordance with the laws of the Participating Entity or Purchasing Entity's State, provided that 12 U.S.C. 1831d shall apply on the basis of the location of the Contractor.

17.15 JURISDICTION & VENUE. In the event that any action is brought to enforce any provision of this Master Agreement, the parties agree to submit to exclusive jurisdiction in Thurston County Superior Court for the State of Washington and agree that in any such action venue shall lie exclusively at Olympia, Washington; Provided, however, that venue for any claim, dispute, or action concerning this Master Agreement or the effect of a Participating Addendum shall be in the Participating Entity's State.

17.16 SOVEREIGN IMMUNITY. In no event shall this Master Agreement, any Participating Addendum, or any act of the lead State, a Participating Entity, or Purchasing Entity be a waiver of any form of defense or immunity, whether sovereign immunity, governmental immunity, immunity based on the Eleventh Amendment to the Constitution of the United States or otherwise, from any claim or from the jurisdiction of any court. This section applies to a claim brought against the Participating Entities who are states only to the extend Congress has appropriately abrogated the state's sovereign immunity and is not consent by the state to be sued in federal court.

17.17 ATTORNEYS' FEES. Should any legal action or proceeding be commenced by either party in order to enforce this Master Agreement or any provision hereof, or in connection with any alleged dispute, breach, default, or misrepresentation in connection with any provision herein contained, the prevailing party shall be entitled to recover reasonable attorneys' fees and costs incurred in connection with such action or proceeding, including costs of pursuing or defending any legal action, including, without limitation, any appeal, discovery, or negotiation and preparation of settlement arrangements, in addition to such other relief as may be granted.

17.18 FAIR CONSTRUCTION & INTERPRETATION. The provisions of this Master Agreement shall be construed as a whole according to their common meaning and not strictly for or against any party and consistent with the provisions contained herein in order to achieve the objectives and purposes of this Master Agreement. Each party hereto and its counsel has reviewed and revised this Master Agreement and agrees that the normal rules of construction to the effect that any ambiguities are to be resolved against the drafting party shall not be construed in the interpretation of this Master Agreement. Each term and provision of this Master Agreement to be performed by either party shall be construed to be both a covenant and a condition.

17.19 FURTHER ASSURANCES. In addition to the actions specifically mentioned in this Master Agreement, the parties shall each do whatever may reasonably be necessary to accomplish the transactions contemplated in this Master Agreement including, without limitation, executing any additional documents reasonably necessary to effectuate the provisions and purposes of this Master Agreement.

17.20 EXHIBITS. All exhibits referred to herein are deemed to be incorporated in this Master Agreement in their entirety.

17.21 CAPTIONS & HEADINGS. The captions and headings in this Master Agreement are for convenience only and are not intended to, and shall not be construed to, limit, enlarge, or affect the scope or intent of this Master Agreement nor the meaning of any provisions hereof.

17.22 ELECTRONIC SIGNATURES. A signed copy of this Master Agreement or any other ancillary agreement transmitted by facsimile, email, or other means of electronic transmission shall be deemed to have the same legal effect as delivery of an original executed copy of this Master Agreement or such other ancillary agreement for all purposes.

17.23 COUNTERPARTS. This Master Agreement may be executed in any number of counterparts, each of which shall be deemed an original and all of which counterparts together shall constitute the same instrument which may be sufficiently evidenced by one counterpart. Execution of this Master

Agreement at different times and places by the parties shall not affect the validity thereof so long as all the parties hereto execute a counterpart of this Master Agreement.

EXECUTED as of the date and year first above written.

STATE OF WASHINGTON
DEPARTMENT OF ENTERPRISE SERVICES

By: _____

Name: Corinna Cooper

Its: Statewide Enterprise Procurement Manager

WEX BANK
A UTAH CORPORATION

By: _____

Name: Tim Laukka

Its: President

FLEET CARD PRODUCTS

This exhibit details the type of Fleet Card products and services that are within the scope of this Master Agreement. Fleet Card Types include:

- Fleet Card – Physical specialized Commercial Card used to capture fleet-related expenses (e.g., fuel, vehicle maintenance, aviation, marine, electric, repair and service).
- Cardless Account (WEXPay) – Virtual card (no plastic) account used for maintenance services.

WEX CARD PROGRAM

WEX is offering the Universal WEX Fleet Card, a corporate liability card that offers acceptance in all 50 states, at more than 95% of U.S. retail fueling locations, all of which provide Level III data. The card is accepted by all major oil companies and fuel retailers as well as independent merchants, in urban, rural, and remote locations.

The WEX Fleet Card is also accepted at more than 4,000 locations in Canada.

WEX customers can be billed using centralized or decentralized invoicing across agencies and departments as desired. The program supports nine levels of hierarchy, offering robust reporting and billing flexibility.

1. THE WEX FLEET CARD

The WEX Fleet Card program offers best-in-class card functionality, reporting and customer service. Our technology and services include:

- Level III data capture on 99.8% of transactions, including remote sites that may only transmit Level I or II using MasterCard, for greater insight and fraud protection
- Nine levels of hierarchy for more flexible reporting and billing options
- Advanced card-to-PIN functions; ability to tie one card to one PIN, etc.
- More flexible prompting options at point of sale
- Acceptance at more than 95% of all retail fuel sites in the U.S., plus expanded acceptance through virtual MasterCard technologies
- Comprehensive Federal and State tax exemption, reporting and recovery program
- Robust online reporting tools through WEXOnline®, including ability to schedule and share custom reports
- Ability to customize data fields and add GL codes for accounts, drivers, vehicles or cards for greater financial control and visibility
- Control user access to the online system, with advanced administrative functions

2. WEXPAY™

Along with the flagship Fleet card, WEX is offering **WEXPay™**, a tool that enables out-of-network purchases at an additional 398,000 merchants in the MasterCard® network by utilizing a virtual card interface. Typically used for independent or geographically remote fuel and service sites, WEXPay™ provides the control of a fleet card with the convenience of a credit card.

This out-of-network tool reduces the number of out-of-network sites where drivers would have to use an alternative form of payment.

Using WEXPay™ in conjunction with a Custom Control fleet card lets Purchasing Entity set the rules for drivers. Custom Control cards allow Purchasing Entity to set merchant, transaction, and even product type limits. WEX apply those limits to both WEX Fleet Card and WEXPay™ MasterCard transactions. Expanded coverage combined with integrated reporting and invoicing will further streamline Purchasing Entity fleet purchasing and operations.

How WEXPay Works: As a MasterCard issuing bank, WEX uses Single-Use Account Number technology to authorize a one-time payment to a merchant. The account number provided to the merchant by phone is fast and secure — good only for that one purchase.

When the merchant calls for authorization, WEX applies the Purchasing Entity's purchase controls and collect the same level of purchase detail, including Prompt ID and odometer. WEX integrate the purchase details into Purchasing Entity WEX Fleet Card invoice and reports. One card, one invoice, one report with the same controls and service our Purchasing Entity's expect from WEX.

** Purchases are subject to the MasterCard transaction processing rules and terms of use, including tax exemption rules.*

3. WEX SERVICE NETWORK

WEX also offers acceptance for service and maintenance needs through the **WEX Service Network**. WEX Custom Control cards can be used to purchase tires, transmissions, brakes, mufflers, oil changes, glass replacement, car washes, and other routine vehicle maintenance products and services at national brand and local service stations, including Goodyear, Sears, Jiffy Lube, Valvoline, and Bridgestone/Firestone. The WEX card is currently accepted at more than 32,000 locations that provide service.

4. WEX EV FLEETCHARGE

The WEX Fleet card also helps government fleets in their sustainability and greening initiatives. If a Purchasing entity is facing mandates to cut emissions, **WEX EV FleetCharge**, WEX's partnership with ChargePoint, allows a Purchasing Entity to use their WEX Fleet card to pay for charges at more than 66,000 Electric Vehicle charging sites. Purchasing Entities will also get reporting on EV charges that integrates with their traditional liquid fueling activity for a total fleet view of their fuel usage.

5. AVCARD PROGRAM

Purchasing Entities can manage their aircraft fueling, maintenance, and activity as easily as they manage their ground fleet with the **AVCARD program**. AVCARD — a complete purchasing solution for fuel and related aviation services — is a credit card and contract fuel program used by corporate and private flight departments at both domestic and international airport locations. In addition to the Purchasing Entity's WEX Fleet Card account, WEX can set them up with an AVCARD account, which is integrated with the Purchasing Entity's WEX account.

AVCARD cards function as both a credit card and a contract fuel card. Purchasing Entities only need one card program for purchasing fuel and services from all AVCARD acceptors and/or contract fuel suppliers.

AVCARD is the most widely accepted aviation credit card, providing fuel access at 7,500 locations in more than 190 countries. With an AVCARD account, a Purchasing Entity automatically participate in their Contract Fuel Program, which allows them to receive significant savings on jet fuel virtually everywhere in the world. AVCARD's 24/7 Fuel Dispatch team is available to find, prearrange and quote, Contract Fuel prices worldwide for all trips.

Look up accepting locations by individual IATA/ICAO codes or geographically by country, state and city at WFSCORP.com. Purchasing Entities can also:

- View and download contact information and a detailed listing of specific services provided (catering, rental cars, hangar, etc.)
- Prearrange fuel and services
- Log in to obtain contract fuel pricing
- Request a firm Price Quote by email
- Report a lost or stolen card online or use the toll-free number during business hours

Purchasing Entities can sign up and use the convenient features of the AVCARD program at no additional charge.

6. MARINE FUEL

Fleets can purchase gasoline and diesel fuel at **marine fueling locations** through a combination of direct acceptance of the WEX Fleet Card at marinas with branded oil locations through electronic point of sale systems, and at any of the more than 9,500 marina locations that accept MasterCard worldwide. The WEX Fleet Card and WEX*Pay™* would be used at these accepting locations just like any other fueling location to purchase fuel and related services. Additional terms and conditions apply.

7. ALTERNATIVE FUEL & ADDITIONAL ACCEPTANCE

Certain WEX-accepting merchants supply ethanol, natural gas (CNG, LNG), propane (LPG), hydrogen, biodiesel, methanol, and other alternative fuels. So WEX has created an **Alternative Fuel Directory** using transaction information passed to WEX by accepting merchants, and from external sources such as the Department of Energy. This directory contains more than 6,000 WEX-accepting sites that carry at least one alternative fuel type. This directory is available through a download from WEX*Online®*, or can be provided in hard copy for use in vehicles. WEX uniquely reports ethanol, methanol, CNG, LNG, and biodiesel.

WEX is always **increasing its acceptance coverage** for fuel, marina and service locations. Because WEX currently have acceptance at more than 95% of all U.S. fuel sites, our merchant acquisition strategy is driven by the needs of our fleet customers requiring service in remote areas or acceptance outside of domestic coverage. If a fleet customer identifies specific fueling needs, WEX will work toward signing any needed location

If the customer has merchants that they would like to be part of the WEX accepting network who do not already have direct acceptance or cannot utilize the WEX*Pay™* tool, WEX will request the following information from the fleet:

- Merchant name
- Merchant address
- Merchant contact person
- Phone and fax numbers
- Expected utilization/volume from a Purchasing Entities fleet
- Name and phone number of fleet employee requesting WEX card acceptance

WEX will work with all interested parties toward gaining acceptance at the location. This includes either direct agreements or acceptance through our partnerships with network sales organizations and acquirers.

WEX OPTIONAL PRODUCTS /SERVICES

1. **WEX FLEET CLEARVIEW™** is a suite of powerful, cloud-based analytic solutions that automatically organizes, interprets, and intuitively displays fleet-related information. Critical data is presented in an intentional layout of simple and informative visualizations, helping fleet managers monitor operations, understand trends, benchmark performance, investigate anomalies, and recognize cost-saving opportunities.

   With an eye toward designing solutions for fleets with a wide range of needs, WEX ClearView products present complex fleet data in straight-forward and compelling graphics turning information into insights.

   ClearView Essentials. With ClearView™ Essentials, a Purchasing Entity will enjoy actionable insights into fuel expense and driver purchasing that they have not experienced before. Purchasing Entities will quickly see a gain in time savings due to the elimination of manual manipulation and analysis of spreadsheets and identify opportunities to reduce their fuel expense. ClearView™ Essentials, the cornerstone of the ClearView™ analytics product suite, provides a comprehensive range of analysis opportunities: Within the five ClearView™ Essentials modules there are many key pieces of functionality that can be utilized to more comprehensively and accurately analyze vehicles and the employees driving those vehicles each day.

   ClearView™ Advanced. ClearView™ Advanced gives a Purchasing Entity all the data analytics power of ClearView™ Essentials and more. It offers exceptional opportunities for fuel price optimization. In addition, ClearView™ Advanced provides an entirely new channel for communicating with drivers and/or managers, enabling the Purchasing Entity to implement, track, and evaluate the effectiveness of driver messaging campaigns.

   Identify and eliminate costly and unwanted driver purchasing behaviors: ClearView™ Advanced helps Purchasing Entities hone in on which drivers' purchasing habits represent the greatest opportunities for savings. Quickly spot drivers who purchase unnecessary fuel grades or consistently buy from high-priced merchants. Once the drivers are identified, they can be targeted with behavior-specific messaging campaigns delivered via email or text from the ClearView™ platform. Customers using ClearView™ Advanced have experienced success in reducing unwanted driver purchasing behaviors and have realized thousands of dollars in savings. ClearView™ Advanced is add-on feature to ClearVeiw and is optional. The fee is **$0.25/month** (.25 cents) **per active card.**

   ClearView Snap. ClearView™ Snap gives a Purchasing Entity a quick snapshot of their agency's fueling activity in easy-to-interpret charts and graphs that are delivered directly to their inbox on a monthly and/or weekly basis. No login is required. These simple, clean visuals display prior period actuals, period comparisons, and trends over time. Easily share key fueling metrics with senior leadership and the field building awareness and oversight of their fuel card program.

   ClearView Snap™ includes an Alexa voice skill which offers a new delivery channel, daily updates, and limited amounts of transaction-level information. Alexa will verbally relay information about dollars spent, gallons purchased, highest-spending employees, and tracks six savings opportunity and potential misuse exceptions, such as non-regular fuel purchases, exceeding tank capacity, and weekend fueling.

2. TAX EXEMPTION, RECOVERY, AND REPORTING PROGRAM

Federal Gasoline and Diesel Excise Tax-Exempt Program. WEX will invoice a Purchasing Entity net of all Federal excise taxes on gasoline and diesel, at the transaction level, regardless of merchant participation if they are qualified as tax-exempt.

State Sales, County and Local Taxes at Participating Merchants. WEX currently offers eligible tax-exempt entities a comprehensive tax exemption and reporting program for applicable motor fuel transactions based on merchant participation. The program supports the following levels of tax, including:

- State Primary (Excise Tax)
- State Secondary (Sales Tax)
- State Special
- County Primary (Excise Tax)
- County Secondary (Sales Tax)
- County Special
- City Primary (Excise Tax)
- City Secondary (Sales Tax)
- City Special

Tax-exempt reporting through WEXOnline®, WEX*Link*™ 300, and the paper PAR (Purchase Activity Report) shows:

- Exempted Tax, at the transaction level
- Reported Tax, at the transaction level
- Summary of tax types by product for both exempted and reported transactions (available on the paper PAR only)

State Sales Tax and County Tax at Non-Participating Merchants. For fueling transactions with those fuel marketers that do not participate in the WEX tax-exempt program, but for which the fleet is eligible to receive tax exemption, WEX reports applicable taxes as "Reported Tax." "Reported Tax" transactions list transactions and tax amounts that WEX does not exempt so the fleet can file for exemption. Many fleets use their WEX*Link™* data file to aid in the recovery of taxes that could not be excluded through the tax-exempt program. Reporting shows:

- Exempted tax, by transaction
- Reported tax, by transaction
- Summary of tax types by product for both exempted and reported transactions

Tax Exemption for Non-Fuel Purchases. For non-fuel transactions, merchants may provide transactional data to WEX net of tax on a fleet-by-fleet basis at the merchants' discretion. Drivers must supply the merchant with proper documentation of the organizations tax-exempt status at the point of sale. The merchant will send the transaction to WEX, net of tax, for billing.

Qualification. Any fleet participating in this contract will be required to complete a certification process affirming its qualification to receive the tax exemption based upon the rules and criteria set by the appropriate taxing jurisdiction.

Required Data. Tax Exemption processing requires that the merchant provide electronically to WEX the following data points:

- Account Number

- Account Name
- Type of Fuel
- Gallons
- Price per gallon
- Total gross sale

Not all transactions may have exemptions applied to them. WEX is not able to exempt applicable fuel taxes on transactions that are provided with certain data elements that are missing and may be autocorrected. Taxing jurisdictions require documentation from the party providing the exemption of the type of fuel, gallons purchased, and price per gallon. There are occasions where the merchant is unable to provide all the required documentation, therefore these transactions will not go through our tax processing. However, if a Purchasing Entity provides WEX with a copy of the sales receipt, WEX can repost these transactions and apply the applicable exemptions.

3. PRIVATE SITE AND BULK FUEL SOLUTIONS

For fleets with private site and bulk fueling needs, WEX offers secure, live authorizations and integrated reporting for onsite bulk fueling transactions. A Purchasing Entity can select one of two options.

Private Site Program. WEX's private site program allows a Purchasing Entity to use the WEX Fleet Card to activate pumps at their onsite bulk fuel tanks, allowing for increased security and asset-level fuel usage reporting on their bulk fuel. WEX captures Driver ID and odometer information, authorizes the card swipe, and provides integrated reporting of the private site transactions with the Purchasing Entities retail transactions while excluding onsite fuel transactions from their invoice.

Private Site Reporting. Private Site Reporting consolidates tracking of onsite and retail fuel transactions into one comprehensive report and allows the Purchasing Entity to monitor private transactions for abuse through purchase controls at the point of sale using their WEX card.

This program provides in-depth reporting of onsite fuel transactions at the vehicle level, integrated with retail fuel purchases. Onsite fuel transactions are excluded from the Purchasing Entity's invoice while providing consolidated comprehensive vehicle level paper and electronic reporting along with their retail transactions.

Once installed, a Purchasing Entity's card readers will be required to retain reportable information so they don't have to. Just like a retail transaction, the driver initiates the data capture by entering the Driver ID and odometer. The card reader will provide the fuel type, gallons, PPG as programmed in the card reader, and total sale. Upon receipt, WEX integrates this key information into the Purchasing Entity's fleet's usage reporting. Card security features help mitigate fuel theft, and comprehensive tracking of usage and consumption will help them better control costs.

Using private site card readers with the WEX Fleet Card Program quickly gets Purchasing Entities on track to minimize time, effort and cost of administering fuel usage.

Transactions that occur at a private site location, utilizing a local (non-networked/non-WEX) authorization, carry no additional costs from WEX. If a site owner were to network their transactions from their owned private site locations to WEX (run each translation through a network to WEX for authorization), there is a **$0.15/transaction** (.15 cent) cost. This is a pass-through cost of using a network.

4. WEX EMERGENCY FUEL PROGRAM

WEX Emergency Fuel is an optional service may be offered, negotiated and mutually agreed in Participating Addendum.

High Level Overview of program: For public safety and public works vehicles that require 100 percent uptime, guaranteed, **WEX Emergency Fuel** provides peace of mind to public fleet administrators who cannot be caught without fuel in an emergency. Sign up for WEX Emergency Fuel and when weather or a disaster disrupts a Purchasing Entities fuel supply, WEX will connect them with one of our approved partners to get their fleet back on the road with the fuel they need. Guaranteed. Because WEX partners with the leading providers of emergency fueling services, WEX has the necessary supply sources and logistical network to guarantee 100% uptime, including fuel dispensing equipment, mobile fueling trailers, military-grade rapid deployment equipment, high-water fueling vehicles, mini-mobile fueling stations, diesel and gasoline generators and more.

FLEET CARD REBATE/INCENTIVE SHARE

This Exhibit includes the Rebate/Incentive Share components for Fleet Card Services.

Rebate amounts will be based on total spend less write-offs, returns, and fraudulent charges.

A single payment combining Incentive Share Components 1 and 2 will be paid directly to the Participating State/Purchasing Entity on a quarterly basis as determined in the Participating Addendum. Incentive Share Payments can be made via account credit, mailed check, ACH or EFT payment (standard or non-standard format) as determined in the Participating Addendum. Incentive Share Payments must be received no later than the 60th day following the end of each calendar quarter.

Incentive Share Component 3 will be paid to the Participating State on an annual basis. Incentive Share Payment can be made via mailed check, ACH, or EFT as determined in the Participating Addendum. Incentive Share Payment must be received no later than the 60th day following the end of each calendar year.

Delivery of the rebate may be adjusted in any Participating Entity's Participating Addendum.
1 Basis Point = .0001 or .01%

INCENTIVE SHARE COMPONENTS

1. **INCENTIVE SHARE #1 – STANDARD VOLUME INCENTIVE**

   Each Participating Entity will receive a basis point (percentage) of their quarterly standard sales volume. The formula for calculating the Standard Volume Incentive is:

   Quarterly Total Volume x basis points = Quarterly Standard Volume Incentive.

   Basis Points Offered: 170 basis points (1.70%)

   Conditions. The Rebate set forth herein is expressly conditioned on the following: (1) monthly billing; (2) payment in full within 45 calendar days of the billing date appearing on the Purchasing Entity's invoice; (3) credit approval.

   Quarterly Total Volume spend by all Purchasing Entities for all card liability products in a Quarter. "Quarterly Total Volume" includes the total amount of all purchases made using Cards at retail locations that appear on invoices provided to the Purchasing Entity in three calendar months. Quarterly Total Volume shall not include: (i) those amounts representing credits, disputed items, fees, late fees or charges posted to their accounts (such as returned check fees, collection costs, administrative fees and reporting fees), (ii) fuel purchased at Tier 1 Truck Stop locations* (currently Flying J, Loves, TA, Petro, and Pilot), or (iii) any amounts posted to an account with respect to which a Card has been reported lost or stolen. **Purchasing Entities will be charged the posted cash price at Tier 1 truck stops.*

2. **INCENTIVE SHARE #2 – PROMPT PAYMENT INCENTIVE**

Each Participating Entity will receive a basis point (percentage) of their Quarterly Total Volume based on the entity's average speed of pay. The formula for calculating the Prompt Payment Incentive is:

Quarterly Total Volume x Basis Points for Entity average file turn days = Quarterly Prompt Payment Incentive.

Note: The payment terms for the Master Agreement is forty-five (45) days.

Conditions. The Prompt Payment Incentive set forth herein is expressly conditioned on the following: (1) electronic reporting (i.e. no paper reports); and (2) our receipt of payment in full in accordance with one of the Average File Turn Days in the Prompt Payment Table.

Basis Points Offered:

Avg File Turn Days	Basis Point	Avg File Turn Days	Basis Point	Avg File Turn Days	Basis Point
1	20	21	7.375	41	1.25
2	19	22	7	42	1
3	18	23	6.625	43	0.75
4	17	24	6.25	44	0.5
5	16	25	5.875	45	0.25
6	15	26	5.5	46	0
7	14	27	5.125	47	0
8	13.5	28	4.75	48	0
9	13	29	4.375	49	0
10	12.5	30	4	50	0
11	12	31	3.75	51	0
12	11.5	32	3.5	52	0
13	11	33	3.25	53	0
14	10.5	34	3	54	0
15	10	35	2.75	55	0
16	9.5	36	2.5	56	0
17	9	37	2.25	57	0
18	8.5	38	2	58	0
19	8.125	39	1.75	59	0

20	**7.75**	**40**	**1.5**	**60**	**0**

3. INCENTIVE SHARE #3 – NATIONAL ANNUAL VOLUME INCENTIVE

Each Participating State will receive an incentive based on the total National Annual Volume (total annual sales for all Participating States/Participating Entities). The formula for calculating the National Annual Sales Volume Incentive is:

National Annual Volume (for all Fleet products) x basis points = National Annual Sales Volume Incentive.

Conditions. The Rebate set forth herein is expressly conditioned on the following: (1) monthly billing; (2) payment in full within 45 calendar days of the billing date appearing on the Purchasing Entity's invoice; (3) credit approval.

Total annual volume spend by all Participating States/Purchasing Entities for all card products in a calendar year. "National Annual Volume" includes the total amount of all purchases made using Cards at retail locations that appear on invoices provided to the Purchasing Entity in a calendar year. National Annual Volume shall not include: (i) those amounts representing credits, disputed items, fees, late fees or charges posted to their accounts (such as returned check fees, collection costs, administrative fees and reporting fees), (ii) fuel purchased at Tier 1 Truck Stop locations* (currently Flying J, Loves, TA, Petro, and Pilot), or (iii) any amounts posted to an account with respect to which a Card has been reported lost or stolen. **Purchasing Entities will be charged the posted cash price at Tier 1 truck stops.*

Basis Points Offered:

Total Annual Spend	Basis Points
$50,000,000 – $100,000,000	**10**
$100,000,001– $200,000,000	**15**
$200,000,001– $300,000,000	**20**
$300,000,001– $400,000,000	**25**
$400,000,001+	**30**

FEES

Below is a list of fees allowed under this Master Agreement.

Fee Type	Fee Amount
Foreign Transaction Fee	1.5% of the total transaction value
Overnight Delivery Fee	$15.00 per occurrence

EXHIBIT C

INSURANCE REQUIREMENTS

1. **INSURANCE OBLIGATION**. During the Term of this Master Agreement, Contractor obtain and maintain in full force and effect, at Contractor's sole expense, the following insurance coverages:

   a. COMMERCIAL GENERAL LIABILITY INSURANCE. Commercial General Liability Insurance (and, if necessary, commercial umbrella liability insurance) covering Bodily Injury and Property Damage on an 'occurrence form' in the amount of not less than $2,000,000 per occurrence and $4,000,000 general aggregate. This coverage shall include Contractual Liability insurance for the indemnity provided under this Master Agreement.

   b. COMMERCIAL AUTOMOBILE LIABILITY INSURANCE. 'Symbol 1' Commercial Automobile Liability coverage (and, if necessary, commercial umbrella liability insurance) included coverage for all owned, hired, and non-owned vehicles. The combined limit per occurrence shall not be less than $1,000,000.

   c. WORKERS' COMPENSATION INSURANCE & EMPLOYER'S LIABILITY (STOP GAP). Contractor shall comply with applicable Workers' Compensation or Industrial Accident Insurance providing benefits as required by law, including Employer's or Stop-Gap Liability with a minimum limit of $1,000,000 per accident.

   d. PROFESSIONAL LIABILITY (ERRORS & OMISSIONS) INSURANCE. Professional Liability insurance in the amount of not less than $2,000,000 combined single limit per occurrence, $4,000,000 general annual aggregate for malpractice or errors and omissions coverage against liability for damages because of personal injury, bodily injury, death, or damage to property, including the loss of use thereof, and damages because of negligent acts, errors, and omissions in any way related to this Master Agreement.

   e. CRIME INSURANCE/EMPLOYEE DISHONESTY. Employee Dishonesty and (when applicable) Inside/Outside Money and Securities coverage for State of Washington and/or purchaser owned property in the care, custody, and control of Contractor, including computer fraud. Coverage limits shall not be less than $2,000,000.

   f. CYBER RISK LIABILITY INSURANCE. Cyber Risk Insurance, on an occurrence form. This coverage shall include Contractual Liability Insurance for the indemnity provided under this Master Agreement. Limits are $8,000,000 per claim/annual aggregate.

   The limits of all insurance required to be provided by Contractor shall be no less than the minimum amounts specified. Coverage in the amounts of these minimum limits, however, shall not be construed to relieve Contractor from liability in excess of such limits.

   A cross-liability clause or separation of insured condition shall be included in all general liability, professional liability, and errors and omissions policies required by this Master Agreement.

2. **INSURANCE CARRIER RATING**. Coverages provided by the Contractor must be underwritten by an insurance company deemed reasonably acceptable to the State of Washington's Office of Risk Management. Insurance coverage shall be provided by companies authorized to do business within the State of Washington and rated A- Class VII or better in the most recently published edition of Best's Insurance Rating. Enterprise Services reserves the right to reasonably reject all or any insurance carrier(s) with an unacceptable financial rating.

3. **ADDITIONAL INSURED**. Except for Workers' Compensation, Professional Liability, and Commercial Automobile Liability, all required insurance shall include the State of Washington and all authorized Purchasers (and their agents, officers, and employees) as an Additional Insureds evidenced by copy of the Additional Insured Endorsement, including blanket Additional Insured Endorsements, attached to the Certificate of Insurance on such insurance policies.

4. **CERTIFICATE OF INSURANCE**. Upon request by Enterprise Services, Contractor shall furnish to Enterprise Services, as evidence of the insurance coverage required by this Master Agreement, a certificate of insurance satisfactory to Enterprise Services that insurance, in the above-stated kinds and minimum amounts, has been secured. A renewal certificate shall be delivered to Enterprise Services within 10 business days of the renewal of any required insurance. Failure to provide proof of insurance, as required, and upon 10 business days prior written notice to Contractor's Risk Manager, could result in contract cancellation. All policies and certificates of insurance shall include the Master Agreement number stated on the cover of this Master Agreement.

5. **PRIMARY COVERAGE**. Contractor's insurance shall apply as primary and shall not seek contribution from any insurance or self-insurance maintained by, or provided to, the additional insureds listed above including, at a minimum, the State of Washington and/or any Purchaser; but only to the extent an indemnity is owed pursuant to this Agreement. All insurance or self-insurance of the State of Washington and/or Purchasers shall be excess of any insurance provided by Contractor; but only to the extent an indemnity is owed by Contractor pursuant to this Agreement.

6. **SUBCONTRACTORS**. Contractor shall include all subcontractors as insureds under all required insurance policies, or shall furnish separate Certificates of Insurance and endorsements for each subcontractor. Each subcontractor must comply fully with all insurance requirements stated herein. Failure of any subcontractor to comply with insurance requirements does not limit Contractor's liability or responsibility.

7. **WAIVER OF SUBROGATION**. Contractor waives all rights of subrogation against the State of Washington and any Purchaser for the recovery of damages; but only to the extent Contractor is legally liable to indemnify the State of Washington and any Purchaser under this Agreement.

8. **NOTICE OF CANCELLATION**. Contractor or its insurer representative shall use best efforts to provide 30 days prior written notice of cancellation of any policy required under this Agreement.

EXHIBIT D

ESTABLISHING A CARD ACCOUNT AGREEMENT

INTRODUCTION

This exhibit explains the process and documentation for establishing an account for an individual Purchasing Entity. Participating States may edit this via the Participating Addendum process.

NEW ACCOUNT & CARD SET-UP: STATE AGENCY ACCOUNTS

In the initial implementation phase, a universal credit line will be established for a Participating Entity based on the Participating Entity's needs and spend requirements. WEX has the ability to place protection against credit lines to ensure a Participating Entity does not experience any service interruptions due to sudden increased spending that can be caused by seasonal, emergency or other unexpected occurrences. This universal credit line then applies to all applicable accounts under the Participating Entity's hierarchy, allowing them to set up accounts without needing to seek a new credit line for each new card set-up.

For new accounts under a Participating Entity's hierarchy, an electronic template is completed and tax exemption information is collected, either through a blanket tax exemption for the Participating Entity, or individually by agency depending on how the Participating Entity is set up with tax identification numbers.

The information required for a new account set-up typically includes account name, DBA account name, account level within the existing Participating Entity's hierarchy, shipping address, and if there are any other further requirements specific requirements a given Participating Entity may have, like ERP integration, etc. Once the information is captured and processed by WEX, an account number is generated and provided to the Participating Entity to complete the proper tax exemption paperwork for enrollment in the WEX Tax Program, assuming it is a financially liable account.

FLEET CARD ENROLLMENT PROCESS: EXISTING PARTICIPATING ENTITY ACCOUNTS

Program administrators can add cards and drivers via the Fleet Manager module of WEXOnline®, WEX's web-based account management and reporting tool, or through WEX customer service or the Participating Entity's Premium Fleet Services Account Manager. The Premium Fleet Services Account Manager is a one-to-one point of contact assigned to the Participating Entity for day-to-day operational support and account needs. The Fleet Manager module allows the fleet manager to add, edit, suspend, reactivate, and terminate cards and drivers, to add and manage card controls, and to view and download invoice details.

Purchasing Entities can also:

- Assign card to driver, vehicle or location
- Transfer cards from one account to another
- Group cards into authorization profiles to enforce their purchasing policies
- Create organizational units or departments to better organize cards, vehicles and drivers for reporting and management purposes (initially added during the implementation phase)
- Edit account information

Card orders: WEX will process requests for replacement cards for lost, damaged, or stolen cards within one business day. If notification is received by 3:30 p.m. Eastern Time, Purchasing Entities can have

cards sent that day. They can use their own shipping account number, or be charged a fee to cover the shipping costs. The WEX overnight fee, is included in Exhibit B. If a WEX card is lost or stolen, it should be reported immediately to WEX's Customer Service Department by calling the toll-free number**.** The Customer Service Department is available 24 hours a day, 365 days a year. The fleet can also notify WEX of the loss, theft, or unauthorized use of any card or account electronically through WEXOnline®.

NEW ACCOUNT AND CARD SET-UP: POLITICAL SUBDIVISION ACCOUNTS

Eligible new accounts using this Master Agreement under a Participating Entity's Participation Addendum (i.e. cities, counties, schools, etc.) will need to complete a Credit Application that references the Master Agreement/Participating Entity's Participating Addendum and have their credit adjudicated independent of the State's line of credit. WEX will collect both the credit application and tax exemption form, both of which can be completed electronically or manually, from the interested entities prior to their account set-up.

*See the WEX Credit Application, attached in Exhibit E, for a political subdivision participation under this Master Agreement.

Note: This Credit Application can be customized and can be discussed with each Participating State during the discussion of their Participation Addendum. A Credit Application will be made for each Participating State to account for the Master Agreement and that state's individual Participation Addendum to the Master Agreement.

EXHIBIT E

WEX FORMS AND SPECIFIC TERMS & CONDITIONS

This exhibit includes form templates and specific terms and conditions for certain WEX products and services.

Required Forms for Fleet Card Products and Services

- Addendum to the Fuel Card Services Agreement (Credit Application)
- WEXOnline Click through Terms & Conditions

Optional Products and Services Forms

- Tax Exemption and Reporting Program
- WEX ClearView Enrollment Packet
- Private Site Enrollment Packet
- WEXPay Enrollment Packet

ADDENDUM TO THE FUEL CARD SERVICES AGREEMENT BETWEEN WEX BANK AND THE STATE OF (the "STATE")

CREDIT INFORMATION				
Participating Entity agrees that in the event the account is not paid as agreed, WEX Bank may report the undersigned's liability for and the status of the account to credit bureaus and others who may lawfully receive such information.				
Participating Entity			Phone #	Fax#
Headquarters Name and Physical Address (Do not include PO Box)				Applicant's Taxpayer ID # (TIN, FEIN or SSN)
In Business Since (yyyy)	Year of Incorporation	Number of Veh	Avg Monthly Fuel Expenditure $	Avg Monthly Service Expenditure $

ACCOUNT SETUP INFORMATION				
Write Participating Entity name as it should appear on cards. Limit of 20 characters & spaces. Unless specified, no Purchasing Entity name will appear on cards. ☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐				
Billing Contact	Billing Address	City	State	Zip+4
Designate the Fleet Contact authorized to receive all charge cards, reports, and other such information WEX provides from time to time and to take actions with respect to your account and account access. This is also the person designated by the Purchasing Entity to provide all fleet vehicles, driver and other information WEX may request.				
Authorized Fleet Contact Name	Title	Phone #	Fax #	
Mailing Address (if different from billing address)		City	State	Zip+4
Email address (required to take advantage of product type card controls)				
Card Controls: To help WEX estimate the Purchasing Entity's credit needs, indicate the types of cards they anticipate using. If the Purchasing Entity provides a valid email address above, they can select from these product type options: ☐ All Products ☐ Fuel & Service ☐ Fuel & Fluids with Roadside Assistance ☐ Fuel with Roadside Assistance ☐ Mix of card types				
☐ Check here if business is exempt from motor fuels tax				
TERMS				

DEFINITIONS:

"Agreement" means: **Contract No. XXXX effective** for Fuel Cards and Fuel Management Services (the "Agreement") between the **(State of XXXX and NASPO Value Point** and **WEX Bank**.

"Participating Entity" shall mean the Participating Entity as defined in the Agreement permitted to purchase services under the Agreement, as specified in the Credit Information above.

All other capitalized terms used in this Addendum without definition have the meanings set forth in the Agreement.

AGREEMENTS OF WEX BANK AND PARTICIPATING ENTITY:

1. This Addendum is to allow the Participating Entity to participate under the Agreement between WEX BANK and the State. It does not modify, amend or change the Agreement in any way. The parties agree to comply with the terms and conditions of Contract No. XXXX which is referenced and made a part of this transaction.
2. Participating Entity represents that it is authorized or allowed by the laws of its home state to enter into this Addendum and to participate under the Agreement.
3. Participating Entity hereby requests the services of WEX BANK described in the Agreement and agrees to perform all duties of a Participating Entity under the Agreement, including, without limitation, payment of all charges on its account(s) within the time periods provided under the Agreement, payment of any fees provided in the Agreement, and cooperation with respect to providing all necessary information for the administration of the Agreement. Participating Entity agrees to be bound by the terms and conditions of the Agreement, including, without limitation, rules for authorized and unauthorized use of cards, disputes of charges, reporting lost and stolen cards, and all other rules and provisions relating to use of Participating Entity's account.
4. Participating Entity acknowledges that its failure to make timely payment in accordance with the terms of the Agreement and/or the Addendum may result in suspension or cancellation of the account(s). The undersigned represents and warrants that he/she is duly authorized to execute this Addendum on behalf of the Participating Entity and this Addendum is the valid and binding obligation of the Participating Entity, enforceable in accordance with its terms.

INFORMATION SHARING DISCLOSURE: Information regarding Purchasing Entity's transactions may be provided to accepting merchants or their service providers to facilitate discounts or other promotional campaigns of interest to them.

COMPLIANCE WIATH FEDERAL LAW: WEX Bank complies with federal law which requires all financial institutions to obtain, verify, and record information that identifies each company or person who opens an account. Issuer may ask for name, address, date of birth, and other applicable information to identify the Company and/or Account Users.

DISCLAIMER: **THIS IS AN APPLICATION FOR SERVICES AND SHALL NOT BE BINDING UPON WEX BANK UNTIL FINAL CREDIT APPROVAL HAS BEEN GRANTED BY WEX BANK.**

CONTRACTING AGENCY AUTHORIZED SIGNATURE REQUIRED

Any person signing on behalf of the Participating Entity has been duly authorized by all necessary action of Applicant's governing body, and that the undersigned is authorized to make this application on behalf of the Participating Entity.

Signature: _____ Printed Nam _____

Title: _____ Date: _____

Complete and sign addendum. Fax to 1-207-253-1328.

FOR OFFICE USE ONLY	Oppty Number	Sales Code	Plastic Type	Coupon Code	Account Number
				YBA	04

WEX ONLINE CLICK-THROUGH TERMS AND CONDITIONS

1. General

WEX Inc., the parent company of Contractor ("WEX") provides this web site subject to the following terms of use ("Terms"). WEX owns and operates this site. Any Purchasing Entity's continued use of this website constitutes its acceptance of these Terms.

2. Purpose of the Website

The goal of the web site is to provide Any Purchasing Entity with access to information about WEX products and services, and certain functionality with respect to the Business Charge Accounts under or any Purchasing Entity's program. Continued use of the site constitutes the Purchasing Entity's acceptance of these terms and conditions.

3. Trademarks, Service Marks and Copyrighted Materials

WEX controls and operates the website. All content on the website, including, but not limited to, text, photographs, images, illustrations, audio clips, and video clips, is protected by copyrights, trademarks, service marks, and/or other intellectual property rights (which are governed by United States and worldwide copyright laws and treaty provisions, privacy and publicity laws, and communication regulations and statutes). The content is owned and controlled by WEX, its affiliates, or by third party content providers, merchants, sponsors and licensors (collectively the "Providers") that have licensed their content or the right to market their products and/or services to users of this site using this site. Purchasing Entity agrees to abide by all additional copyright notices, information, or restrictions contained in any content that is presented on this site.

Purchasing Entity's may not use any registered or unregistered trademarks, service marks or copyrighted materials appearing on the website, including but not limited to any logos or characters, without the express written consent of the owner of the mark or copyright. Purchasing Entity may not frame, deep link, or otherwise incorporate into another website any of the content or other materials on this website without WEX's express prior written consent.

Violation of trademark and copyright laws may result in significant civil liability or criminal penalties under United States and/or worldwide copyright and trademark laws. Purchasing Entity recognizes that any reproduction or use of content, except as authorized by these Terms, is considered intentional infringement.

4. Use of the Site

Purchasing Entity is are accessing this site using the Internet and Purchasing Entity's Internet service provider. Security cannot be guaranteed. WEX hereby disclaims all liability for any security breaches of online communications or for any electronic, computer or other system failures. WEX shall not be liable to any person for loss, liability or damages, including consequential or special damages, arising as a result of any security breaches or system failures or any other defect of the electronic online communication procedures, including, without limitation, loss due to data modification or destruction.

Purchasing Entity agrees not to use this site for any purpose except (a) access to descriptions of WEX products and services and (b) to the extent agreed with WEX, certain specified functionality with respect to the Business Charge Accounts under Purchasing Entity's program. In using this site Purchasing Entity' agrees not to disrupt or interfere with the site, its services, system resources, nor to upload, post or otherwise transmit any viruses or other harmful, disruptive, inappropriate, illegal or destructive files. Purchasing Entity' also agrees not to use, attempt to use, or access other accounts,

or create or use a false identity on the site.

For the avoidance of doubt, the indemnification provisions set forth above are in addition to those set forth in (i) for Fleet Customers, their Business Charge Account agreement(s) and/or terms and conditions and (ii) for Partners, their Program Agreement(s).

WEX reserves the right to terminate or suspend access to wexinc.com, in whole or in part, at any time, without notice.

This site and the information provided on this site is provided "AS IS" without any representation or warranty, express or implied, of any kind, including, but not limited to, warranties of merchantability, noninfringement, or fitness for a particular purpose. WEX, its subsidiaries and affiliates, make no warranty that use of the site or the materials will be uninterrupted, timely, secure, or error free or that defects, if any will be corrected and WEX assumes no responsibility for any damages that may be suffered by any Purchasing Entity, including, but not limited to, losses from delays, nondelivery of content or any communications, errors, system down time, network or system outages, file corruption or service interruptions.

5. Governing Law

WEX Inc. operates this website (excluding linked sites) from our offices within the state of Maine. The website can be accessed from all 50 states, as well as from other countries around the world. These Terms and Purchasing Entity's use of the web site shall be governed by the laws of the State of Washington, without regard to conflict of laws provisions and shall not be governed by the United Nations Convention on the International Sale of Goods. WEX makes no representation that materials on this web site are appropriate or available for use in other locations, and accessing them from territories where the content is illegal is prohibited. Customers who choose to access this web site from other locations do so at their own risk and are responsible for compliance with local laws, including laws regarding the transmission of technical data exported from the United States or the country in which the user resides.

6. Questions

For questions concerning these terms or the products described online please call the following number: 1-800-492-0669, or send inquiries to: WEX Inc., P.O. Box 639, Portland, ME 04104.

TAX EXEMPTION AND REPORTING PROGRAM

The WEX Tax Exemption and Reporting Program can significantly reduce accounting and administrative time for qualified fleets exempt from motor fuel excise taxes or certain sales taxes — at Federal, state, county or local levels.

Benefits include:

- Net billing of federal excise tax on applicable fuel purchases at any location.
- Net billing of state, local, county and special tax on applicable fuel purchases at participating merchant brands based on local tax laws.
- Detailed reporting of the purchase data and tax exemption.

Exemptions are dependent upon several factors, such as the Purchasing Entity's tax-exempt status for fuel purchases, the taxing jurisdiction's laws, regulations and requirements, and for most state, county and local taxes, require merchant participation. In the event that a transaction cannot be billed "net of tax", a Purchasing Entity will receive detailed reporting showing the full purchase price and the tax paid.

Before WEX can start billing a Purchasing Entity net of applicable taxes on fuel transactions based upon their eligibility, they will need to complete the following required documentation:

1. Tax Exemption and Reporting Program Enrollment form (enclosed)
2. Certificate of Buyer of Taxable Fuel form for federal exemptions (enclosed)
3. Any required State forms – obtain these from the appropriate state governing body.

Please review the enclosed Frequently Asked Questions sheet for helpful information on the program.

IMPORTANT: Purchasing Entities must fill out all forms completely and accurately in order to avoid delays in their program enrollment, so please follow the instructions on the enrollment form carefully.

IRS regulations require that WEX Inc. obtain from a Purchasing Entity, their certification that they are eligible to receive exemptions from federal excise taxes. For all other taxing jurisdictions (state, county, local) a Purchasing Entity may need to submit similar certifications as required by the different taxing jurisdictions. The state certifications may, in most cases, be obtained from the appropriate state's tax department. WEX must have all applicable documents on file prior to providing a Purchasing Entity with exemptions. It is the customer's responsibility to make sure WEX has all of the necessary current forms properly filled out in order to be billed "net of tax".

If a Purchasing Entity has any questions about the program or the enclosed materials, please call WEX at **1-866-841-3542.**

TAX EXEMPTION & REPORTING PROGRAM FREQUENTLY ASKED QUESTIONS

Q: If my fleet begins fueling before I have provided all necessary tax exemption paperwork, what will occur?

WEX will not be able to bill a Purchasing Entity net of taxes or report tax exemptions until WEX has received all necessary forms and completed the qualification and setup process.

Q: When will taxes begin to be exempted?

Once WEX receive all the properly completed forms, WEX will complete the tax exemption setup in approximately 3 business days. WEX will then begin calculating applicable exemptions. It is a Purchasing Entity's responsibility to notify WEX of any errors or omissions that they feel may have occurred. If a Purchasing Entity notices any problems, contact the WEX tax department at 1-866-841-3542.

Q: How can a Purchasing Entity determine their fleet's tax-exempt status for fuel, as well as what type of forms they need?

Purchasing Entities should contact their local Department of Revenue for free help and answers regarding their tax-exempt status for fuel and necessary forms. This agency can best assist a Purchasing Entity with questions of this nature.

Q: Will a Purchasing Entity's fleet be exempted from federal fuels excise taxes?

Yes, if the Purchasing Entity is a qualified entity. Federal law effective January 1, 2006 allows a card issuer to invoice qualified fleets net of federal gasoline and federal diesel excise tax for transactions that occur wherever cards are accepted in all 50 states. In order to be exempted from federal fuels excise taxes, a Purchasing Entity will need to complete a Certificate of Buyer of Taxable Fuel in the name of the card issuer.

Q: Does Purchasing Entity's tax-exempt status apply in all states and localities?

The local Department of Revenue, in each state that a Purchasing Entity's fleet will be fueling, will be able to help determine exemption eligibility for each state and locality respectively.

Q: Will a Purchasing Entity receive state and local exemptions anywhere they can fuel with the card?

Not necessarily. Merchant brand participation in the WEX tax program is optional in most states. Merchant participation is not necessary in the following states: Maine, Georgia, Michigan, North Carolina, Alabama, New York and New Jersey.

Q: What should a Purchasing Entity do if their tax-exempt status changes?

The Purchasing Entity should immediately notify WEX by calling the WEX Inc. Tax Exempt Department at 1-866-841-3542.

Q: Do any of these forms expire and if so will a Purchasing Entity be notified prior to the expiration?

Yes. Federal forms expire every 24 months and certain state forms expire as well. Starting at 120 days prior to the expiration of a Purchasing Entity's tax exemption form(s), WEX will send the Purchasing Entity three monthly reminders that renewed forms are required. If WEX has not received renewed tax exemption forms by the expiration date, the tax exemption process will cease until WEX receives the necessary paperwork and no credits will be given.

Q: Will a Purchasing Entity's fleet be exempted from taxes on non-fuel products?

The Tax Exemption Program provides applicable tax exemption and reporting for **motor fuel taxes only**; however, merchants may provide WEX with non-fuel transaction data net of tax on a fleet-by-fleet basis at their discretion. The fleet will need to supply the merchant with proper documentation of their tax-exempt status at the point of sale for this to occur.

Q: What if a Purchasing Entity's fleet is entitled to a refund for motor fuel taxes that cannot be exempted up front through the WEX program?

In these instances, the "non-exemptible" tax is reported (not exempted) on the Purchasing Entity's fleet report. These reported taxes appear at the transaction level and at a summary level, providing them with supporting documentation, which can help them when filing for a refund of the non-exempted taxes.

Q: What types of tax information reporting will a Purchasing Entity receive?

At the transaction level, a fleet report will provide Gross Cost, Exempted Amount, Net Cost and Reported Taxes (for non-applicable taxes). Additionally, a Tax Exemption Summary will provide a detailed list of all taxes exempted, sorted by state and by tax type. Finally, a Tax Reported Summary will provide a detailed list of all taxes reported, sorted by state and by tax type.

Q: How does a Purchasing Entity know how many forms to send in?

If a Purchasing Entity qualifies for Federal exemptions, they need to send in one form per account or one form with a letter certifying all accounts belong to the same FEIN. If a new account is added in the future, a new form or amended certification letter will need to be sent. For state exemptions, each state is different and will be addressed on an individual basis.

Q: What if a Purchasing Entity believes there is an error with their exemptions?

The Purchasing Entity must notify WEX in writing within sixty (60) days of the billing date of the alleged error. WEX requests that the customer provide as many details regarding the error as possible including, but not limited to: transaction date and time, dollar amount and reason for alleging an error.

CERTIFICATE OF BUYER OF TAXABLE FUEL FOR USE BY A STATE OR NONPROFIT EDUCATIONAL ORGANIZATION

(To support credit card issuer's claim for a credit, refund, or payment under § 6416(a) (4) (B) or § 6427(l) (6) (D) of the Internal Revenue Code.)

WEX Account Number (if known):
Federal Tax Identification Number:
Certification:

The undersigned hereby certifies under penalties of perjury that I am the (Title of Officer):

_____

Of (Certifying Entity): _____

Entity Physical Address: _____

Entity Phone Number: _____

And that I am authorized to execute this certificate and that all purchases, are, or will be, purchased using a credit card issued by

(Credit Card Issuer): WEX BANK
7090 Union Park Center, Suite 350
Midvale, UT 84047

Buyer will use the taxable fuel to which this certificate relates for the exclusive use of: (check one)

☐	State government	☐	American Red Cross or Blood Collection Center
☐	Local government	☐	Indian Tribe
☐	Public nonprofit educational organization	☐	Volunteer Fire/Rescue
☐	Private nonprofit educational organization	☐	Foreign Diplomat (they must provide a copy of their PID Card)

and it applies to all exempt purchases of gasoline and diesel fuel, if eligible, using charge cards issued by the Credit Card Issuer named above. Information including the nature and quantity of each purchase of gasoline and diesel fuel (the subject of this Certificate) are evidenced by periodic reports provided by WEX BANK, the above- named Credit Card Issuer.

Certification will be valid for twenty-four consecutive calendar months commencing upon completion and remittance of this Certificate. WEX Inc. may extend the certificate period upon its discretion for an additional period not to exceed four months.

I understand that by signing this certificate, I, as an authorized representative of the entity named above, give up our right to claim a credit or payment for the taxable fuel purchased with the credit card to which this Certificate relates. I understand that the exemption from tax, in this case of sales of articles under the exemption Certificate, is limited to the sale of articles purchased for our exclusive use. I understand that the fraudulent use of this Certificate for the purpose of securing this exemption will subject us, and all parties making such fraudulent use of this Certificate, to fines or imprisonment, or both, together with the costs of prosecution.

The parties agree that a signed transmission shall be considered valid for purposes of this certification and that the parties hereby waive any claim that a transmission does not satisfy the requirements of a signature or writing under applicable law.

Authorized Signature Printed Signature

Title Date

Email or FAX completed forms to TaxExemptForms@WEXINC.Com or 1-207-523-7104

INTERNAL USE ONLY	Sales Representative:	

TAX EXEMPTION & REPORTING ENROLLMENT FORM

Instructions:

1. Complete part A and sign form at the bottom.
2. Attach FEDERAL Certificate of Buyer and STATE forms (see details below).
3. For questions on signing up for tax exemption and reporting, please call 1-866-841-3542 or email GovTaxServices@WEXInc.com.
4. Email completed forms to TaxExemptForms@WEXInc.com, fax to 1-207-5237104, or mail to Fleet Services, Tax Exempt Department, P.O. Box 639, Portland, ME 04104.
5. Retain the terms on page 2 for your records.

A. ACCOUNT INFORMATION	
Fleet Name:	WEX Account Number (if known):
Authorized Fleet Contact:	Phone No.:
Fleet Contact email:	Fax No.:
Federal Taxpayer ID Number:	
IMPORTANT: Eligibility may be limited based on applicable federal, state and local laws. Participating Entities must fill out these forms completely and accurately in order to avoid delays in their program enrollment, so please follow the instructions carefully.	

B. MOTOR FUEL TAX

- Tax regulations require the Contractor to maintain current copies of the following **applicable forms,** based on the Participating Entity's eligibility:
  1. **Federal —** A Certificate of Buyer of Taxable Fuel in the name of WEX BANK (Included with this form.)
  2. **State —** Applicable state forms. **(Obtain these from the appropriate state governing body.)**

- **Once the Contractor receives all of the Participating Entity's properly completed documentation the Contractor will complete the tax exemption set up on their account within approximately three business days and start billing them net of the Applicable Taxes.**

The parties agree that a signed transmission shall be considered valid for purposes of this enrollment form and that the parties hereby waive any claim that a transmission does not satisfy the requirements of a signature or writing under applicable law.

X Authorized Fleet Signature Date:

USER (INTERNAL USE ONLY):

The information contained in this message is intended only for the use of the individual or entity named above and may contain confidential information. If the recipient of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately at 1-800-492-0669 and return the original message to the attention of the sender at 97 Darling Avenue, South Portland, ME 04106.

TAX EXEMPTION & REPORTING ENROLLMENT FORM

C. TERMS AND CONDITIONS

This Tax Exemption and Reporting Enrollment Form modifies a Participating Entity's charge card agreement based on their participation in the Tax Exemption and Reporting Program ("Program"). Signature on this form and a Participating Entity's continued use of their account constitutes acceptance of these terms and conditions. All capitalized terms contained herein shall have the same meaning as in the Master Agreement with the Contractor unless otherwise expressly provided herein. Except as amended hereby, the charge card agreement governing your account remains in full force and effect.

TAX EXEMPTION AND REPORTING PROGRAM

a. The tax exemption and reporting program (the "program") permits qualified tax-exempt Participating Entities to be billed net of certain "Applicable Taxes" (as defined herein and in Exhibit F). By completing this enrollment form the Participating Entity is electing to participate in the program. The Contractor will enroll a Participating Entity in the program upon receipt by Contractor of all of the Participating Entity's enrollment materials, including all required certificates, and validation of the Participating Entity's tax-exempt status. Upon completion of the Participating Entity's enrollment, their invoices will reflect the net amount due with a line item indicating total "Applicable Taxes" (as defined herein and in Exhibit F). The Participating Entity's reporting will provide a specific breakdown of Applicable Taxes deducted for each taxing authority or jurisdiction. Applicable Taxes are those federal, state, county and/or local taxes levied on the purchase of gasoline or diesel fuel for which the Participating Entity has provided the proper documentation to the Contractor showing their exempt status, and for which such documentation has been accepted by us and for which the Program provides exemption[1].

b. As the Participating Entity's credit card issuer, the Contractor has elected to provide Participating Entities with net billing of Federal excise taxes on fuel based upon the participation requirements in section (a) above. The Contractor will file a claim for refund with the Internal Revenue Service for these taxes. The Participating agrees that they may not file a claim for refund of any federal excise tax exempted by the Contractor and not billed to the Participating Entity by the Contractor.

c. For state, county, special and local taxes, merchants have the option of electing to participate or not to participate in the Contractor's program based on their own preferences and ability to obtain refunds from state/local taxing authorities. Transactions that occur at merchant locations not participating in this program will be billed to Participating Entities with the tax included regardless of their exempt status. In these instances the Participating Entity's reporting will contain a detailed listing of their transactions and the taxes charged to them. This information may assist a Participating Entity in filing their own claims for refunds if they so desire. Participating Entities agree that they may not file a claim for refund of any state, county, special or local taxes exempted by a participating merchant and not billed to them by the Contractor.

d. The tax certificates and other pertinent documentation on which a Participating Entity's exemption is based must be received by the Contractor from the Participating Entity in

order for the Contractor to provide the Participating Entity with net billing of any Applicable Taxes. These documents are required to be completed prior to any net billing of Applicable Taxes in order for the Contractor or a participating merchant to recover such exempted taxes from the applicable taxing jurisdiction. The Contractor shall have no responsibility to verify the correctness of the certificate supplied by a Participating Entity and shall be entitled to rely thereon in preparing the reports and tax exemptions until such time as the Contractor is notified by a Participating Entity in writing of a change in any such data. The Contractor reserve the right to terminate a Participating Entity's participation in the program, provided, however, that such termination shall not terminate the underlying Mater Agreement between the Participating Entity and the Contractor.

e. The Contractor shall calculate tax exemptions based on Internal Revenue Service or other applicable taxing authority guidelines for transactions made by the Participating Entity. For state, county and local taxes, only those transactions agreed upon by the participating merchant shall be treated as tax exempt[1]. If the Contractor is obligated to reimburse a participating merchant for any actual loss incurred or rebill a Participating Entity for any taxes previously exempted (including refunds denied and assessments of previously made refunds and penalties) attributable to the provision of a tax exemption to them, they hereby agree to reimburse the Contractor for said losses incurred.

f. For non-fuel transactions, merchants may provide transaction data to the Contractor net of tax at their sole discretion. Participating Entities would need to supply the merchant with proper documentation of their tax-exempt status at the point of sale. The merchant will send the transaction to the Contractor and the Contractor will bill the Participating Entity net of tax for those transactions. The Participating Entity will not receive reporting of taxes levied or exempted for non-fuel purchases.

g. The Contractor shall comply with reasonable requests for information retrieval made by the Participating Entity.

h. The Contractor cannot apply exemptions to transactions that occurred prior to the Contractor's receipt and acceptance of the Participating Entity's completed certificates.

i. The Contractor shall use reasonable efforts to correctly calculate the amount of tax included in each account arising from a tax exempt sale. The Contractor shall recalculate taxes only in cases where the Contractor miscalculated the original taxable transaction.

j. The Contractor disclaims all warranties in connection with tax-exempt reporting and invoicing and shall not be responsible for the accuracy or completeness of such reports. In no event shall the Contractor be responsible for loss, liability or damages, including consequential or special damages, costs and expenses, including taxes, penalties, interest and attorney's fees that arising as a result of any inaccurate or incomplete report which the Participating Entity may suffer or incur in connection with or arising out of the tax-exempt reporting/invoicing service offered hereunder.

WEX FLEET CLEARVIEW ENROLLMENT PACKET

1. Complete parts A and B.
2. Be sure to sign and date the form at the bottom.
3. Email to the Purchasing Entity's WEX Relationship Manager, (Fill in name and email address)

A. ACCOUNT INFORMATION

Company Name:	**Account Number:**
Authorized Fleet Contact Name:	
Fleet Contact Phone Number:	Fleet Contact Fax Number:
Authorized Fleet Contact Email:	

B. SERVICE OPTIONS

1. Please choose the ClearView product Purchasing Entity plans to enroll in at this time:
   - ☐ **ClearView Essentials** — Volume & Spend, Exceptions, Reports, Community, and Admin modules, Driver and Vehicle Detail, product code and odometer cleansing algorithms, and VIN decoding.
   - ☐ **ClearView Advanced** — Includes Essentials services plus additional functionality such as Fuel Price Explorer, Cost Outliers, Driver Fuel Purchasing Analysis, Driver Messaging, and Campaign Management and Tracking.

2. ClearView Essentials and ClearView Advanced customers can elect to enroll in ClearVieaw Snap for free by checking the box below:
   - ☐ **ClearView Snap** — Key purchasing information and analysis displayed in visual dashboards delivered automatically by email on a weekly and/or monthly basis. Instant voice command access and accompanying visuals using Snap's Alexa Skill.

C. FEES

WEX shall charge the following fee based on the Purchasing Entity's product election above:

(i) ClearView Essentials and ClearView Snap: $0.00 per month

(ii) ClearView Advanced: $0.25 per active card per month.

(Active card is defined as a card that is in active status vs. suspended or terminated status).

WEX reserves the right to change fees with prior written notice.

The ClearView program term will coincide with the Purchasing Entity's card program contract term.

By signing this form, the purchasing Entity agrees to the ClearView (and, if applicable, ClearView Snap) Terms of Use, which supplement the terms of the Purchasing Entity's credit agreement, included herein. The Purchasing Entity further represent that they are authorized to sign on behalf of their company.

X **Authorized Fleet Contact Signature** Date:

Print Name: Title:

Please read the terms on the following pages carefully before using this product.

WEX FLEET CLEARVIEW™ TERMS OF USE

1. **General:** WEX Inc. ("we," "us" and "our") will provide the ClearView platform ("CV") to the Purchasing Entity named in this Enrollment Form (also known as "you", and "your") subject to the following terms of use (the "Terms"). These Terms supplement the general terms of use for our online products as well as your credit agreement with WEX Bank or an approved WEX Issuer and may be used by you only for the purposes set forth in these Terms. You agree to abide by the Terms which shall be applicable to you upon your completion of this Enrollment Form. If you have any questions, please call our Customer Service department at 1-800-492-0669.

2. **Purpose of WEX Fleet ClearView:** The goal of CV is to allow you to perform data analysis for your Accounts (the "Purpose") through the use of this platform. You agree not to use CV for any purpose except to perform analysis on your Account data.

3. **Link and License:** You may access CV using the user login information we provide. We grant you a non-exclusive, non-transferable, limited right to log in and access CV. You agree not to purposefully interrupt or attempt to interrupt the operation of CV, its services or system resources in any way and you may not modify CV in any way nor upload, post or otherwise transmit any viruses or other harmful, disruptive, inappropriate, illegal or destructive files.

4. **Access and Security:** You will access CV using the Internet and your Internet service provider through portals provided by WEX and subject to the terms previously agreed to under your credit agreement with WEX Bank and any online terms previously agreed to for access to our products and features via our online portals.

5. **Important Disclosures:** The availability and effectiveness of portions of CV is dependent upon product codes that the merchant transmits to us. The product codes are assigned by each merchant, and as such, we are not responsible for inappropriate product code assignment, or any claims arising or damages resulting therefrom.

   ClearView includes machine learning algorithms that cleanse erroneous data we receive from third parties. WEX assumes no responsibility for any damages that may be suffered by you due to the use of CV's correction algorithms, in particular but not limited to any subsequent tax filings that you may make using reporting features on CV. WEX does not recommend that you use CV to submit for any fuel tax exemption reimbursements as revenue agencies may not accept this as evidence of your purchase and may still require actual sales receipts. Machine learning algorithms delivered in CV are not integrated with any other WEX systems or reporting.

   On occasion, we will make new products, modules, and functionality available to customers during a free trial, pilot, or beta test. We make no warranty that this new functionality will be error free or that defects, if any will be corrected, and we assume no responsibility for any damages that may be suffered by you due to the use of this functionality. Further, we reserve the right to alter and/or discontinue any new products, modules, and functionality that are offered as part of a free trial, pilot, or beta test.

   CV works best with more current versions of internet browsers, such as Chrome and Firefox. Use of older browsers, more specifically Internet Explorer (IE), is not recommended and should not be used to access and use CV. We assume no responsibility for sub-optimal CV use that may result by using a non-recommended browser.

   We will make an attempt to port in data from other programs and systems, such as customer-generated or third party data. We make no warranty that we will be able to successfully import non-WEX originated data into CV or that if successful this data will be error-free or that defects, if any, will

be corrected, and we assume no responsibility for any damages that may be suffered by you due to the use of this data.

Data, such as transactional data from a card swipe, could take up to 24-48 hours to load into CV.

6. **Modifications:** We reserve the right to modify, change or discontinue any aspect of CV and the products and services accessed via CV at any time upon 15 days prior written notice. We may also impose limits on certain features and services or restrict your access to parts or all of CV without liability.

7. **Versions:** New Versions: We may publish revised and/or new versions of both modules and documentation, such as the CV Quick Start Guides, from time to time ("New Version" or "New Versions").

   Effect of New Versions: When a New Version is published and/or revised, we may modify the Terms applicable to the New Version. You may commence using the New Version once published and/or revised at your election. You will be required to agree to any additional terms of use for a New Version prior to using any New Versions.

   Retirement of Versions: We may make CV product obsolescence and retirement decisions that maximize customer and marketplace benefits. We will notify you of such planned obsolescence and retirement decisions.

8. **Representations and Warranties:** CV is provided "AS IS" without any representation or warranty, express or implied, of any kind, including, but not limited to, warranties of merchantability, or fitness for a particular purpose. Notwithstanding the foregoing, we represent and warrant that to the best of our knowledge and belief: (i) the content developed by us available through CV: (a) does not and will not infringe any copyright, trademarks or trade secrets of any third party; and (b) does not and will not constitute a defamation or invasion of the rights of privacy or publicity of any kind of any third party, and (ii) CV does not violate the laws, statutes or regulations of any jurisdiction.

9. **Assignment:** You may not sell, assign, transfer or otherwise convey any of your rights or delegate any of your duties under these Terms without our prior written consent.

10. **Independent Parties:** Nothing in these Terms shall be deemed to constitute, create, give effect to, or otherwise recognize a partnership, joint venture or formal business entity of any kind or create a fiduciary or similar relationship between the parties not in existence prior to the effective date of these Terms; and the rights and obligations of the parties shall be limited to those expressly set forth herein.

11. **Questions:** For questions concerning these Terms, please call the following number: 1-800-492-0669, or send inquiries to: WEX Inc., 97 Darling Avenue, South Portland, ME 04106. Be sure to include your account number with all inquiries. For questions concerning CV, please email WEX at support@wexclearview.com.

ADDITIONAL CLEARVIEW™ PRIVACY ISSUES

1. Consumer Privacy Rules

The objective of this Privacy Policy is to provide you with a clear, concise and accurate statement of how WEX handles customer information. Please note that our products and services are intended to be used only for commercial and business purposes. As our products and services are not intended to be used for personal, family or household purposes, consumer privacy protection laws and regulations do not apply to our information handling practices for these programs. This Privacy Policy is not a statement of intent to be bound by or comply with such laws and regulations.

2. Security

WEX recognizes the importance of secure online interaction, and we utilize a number of methods to safeguard your transmissions. Our Website is hosted on secure servers with firewall protection. WEX uses Secure Socket Layer (SSL) encryption technology on our Website and information that is gathered is stored within secure databases protected by multiple firewalls. As effective as current encryption technology is, however, no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information provided via our Website will not be intercepted while being transmitted to WEX over the Internet.

3. Children

WEX provides only business services and does not intend to collect or knowingly collect any information from or about children. It is possible that a child may impersonate a company representative and attempt to access or use this Website and, in so doing, provide the child's name, address, phone number, fax number, email address and other identifying information. When such information is received and WEX is aware that the individual providing the information is a child, the information is used only to reject the child's application and is immediately deleted by WEX. Such information is never shared with third parties. WEX cannot always determine if a visitor to its Website or the sender of an email is a child.

4. Cookies

Our Website makes use of a standard feature of browser software called a "cookie" to assign each visitor a unique, random number. A cookie is a file that identifies a computer as a unique user. Cookies may be used to facilitate your use of our Website, to maintain site security and to improve our Website. Most browsers are initially set up to accept cookies. You may be able to reset your browser to refuse all cookies or to indicate when a cookie is being sent. If cookies are disabled, however, our Website (and other Websites) may be harder to use. A cookie cannot read data stored on the hard drive of a computer.

5. Links to Other Websites

Our Website contains links to other sites whose information practices may be different than ours. If you click on a banner or other hyperlink, you may be transferred off of this Website. Our inclusion of hyperlinks to these websites does not imply any endorsement of the material on such web sites or associations with the operators of the websites. Our Privacy Policy does not extend to these sites or the internet. You should consult the other sites' privacy notices as WEX has no control over information that is submitted to, or collected by, these third parties and how that information is used.

6. Security of your Data in Cloud-Based Storage

ClearView uses cloud-based databases and employs a sophisticated firewall that protects from hackers and intruders attempting to gain access to your fleet data. As a protective measure, ClearView does NOT store full card numbers.

7. Security of Your Data across the Internet

A third layer of security is data encryption, or SSL, between the web server and your browser. Encryption helps prevent technically sophisticated individuals who have the desire, tools, and opportunity from intercepting your data as it travels over the Internet.

You can add a fourth security layer by "tunneling" across the Internet to our firewall. Tunneling requires installation of additional software and a fixed IP address, which may be acquired from your local systems

Technical questions and concerns relating to security should be directed to the WEX Inc. Webmaster at webadmin@wexinc.com. For questions relating to usage, please email support@wexclearview.com.

WEX PRIVATE SITE ENROLLMENT PACKET

Secure, live authorizations and integrated reporting for onsite bulk fueling transactions.

Choose Between Two Program Options:

1. **Private Site Program:** Allows Purchasing Entity to use the WEX Fleet Card to activate pumps at Purchasing Entity's onsite bulk fuel tanks allowing for increased security and asset-level fuel usage reporting on Purchasing Entity's bulk fuel. WEX captures Driver ID and odometer information, authorizes the card swipe, and provides integrated reporting of the Private Site transactions with Purchasing Entity's retail transactions while excluding onsite fuel transactions from Purchasing Entity's invoice.

2. **Private Site Rebilling Program:** Combines the same features and functionality of the private site program with the ability to allow other WEX Universal fleets to fuel at Purchasing Entity 's onsite bulk tank.* Purchasing Entity will receive a private site report that details all of Purchasing Entity transactions—both non-financial and rebilled. WEX will handle the reconciliation and settlement on Purchasing Entity behalf. WEX will bill the visiting fleet. Funds from the visiting fleet transactions will be automatically deposited in Purchasing Entity's bank account via ACH 30 days after the transaction posts in the WEX system.

   How It Works:
   - Fleet must have or install certified card readers (see certified equipment vendor list)
   - Drivers, who fuel at the site, are prompted for Driver ID and Odometer reading
   - Card reader provides fuel type, gallons, PPG, and total sale
   - WEX integrates the information into Purchasing Entity's fleet's reports
   - Depending on Purchasing Entity's set-up, certain fees may apply

   The Benefits:
   - Consolidates tracking of Purchasing Entity's onsite and retail fuel transactions into one comprehensive report.
   - Minimizes time, effort, and cost of administering fuel usage.
   - Purchase controls available through the Purchasing Entity's WEX card monitor private site transactions for card abuse and misuse.

   Easy Processing:
   - Driver swipes their WEX fuel card at the onsite card reader.
   - Card reader prompts driver for Driver ID and odometer reading on vehicle.
   - Card reader dials out via network to WEX for authorization.
   - WEX authorizes sale and pump activates.
   - Driver fuels vehicle.
   - Card reader sends final sale to WEX via network.
   - WEX processes this information and posts the information in Purchasing Entity's fleet reporting.

   *Rebilling functionality is only available for certain types of programs. Please contact the Purchasing Entity's WEX Sales Representative for more information.

Set-up and Maintenance

1. Customer contacts certified equipment providers found in the Private Site Agreement Packet
   - Customer obtains quotes, makes a purchase, and has the equipment installed
   - If the customer already owns equipment; they contact the vendor to confirm they have what is needed to process WEX
2. Customer completes the WEX Private Site Agreement Packet*
3. Customer emails the packet to MerchantApplications@wexinc.com
4. WEX begins the setup in WEX Systems**
5. WEX reaches out to the network to obtain a terminal ID number
6. WEX uses the terminal ID number to complete the setup
7. WEX emails a checklist containing the terminal ID and WEX Site ID to the customer
8. Customer reaches out to equipment provider or tech, and provides them with the checklist
9. Using the checklist, the tech contacts the network number provided to complete the setup

*Agreement is sent to WEX after the equipment has been installed
**Steps 3 – 7 are completed in 3-5 business days. WEX is unable to completed same-day setups.

PRIVATE SITE OWNER	*WEX*	NETWORK
SETUP		
1. Purchase or validate existing POS equipment and software with Purchasing Entity's vendor. All equipment must be certified by WEX. See the attached list of vendors to ensure a certified equipment purchase.		
2. Provide a completed and signed Private Site Agreement (see attached) to WEX. *If participating in Rebilling, complete the Rebilling portion of the agreement as well.	**3.** WEX Merchant Operations updates the fleet accounts, including transaction pricing, setup costs and site(s), and works with the Network to obtain the Purchasing Entity's Private Site Merchant / Terminal ID. *If participating in Rebilling, Merchant Operations will set up the banking information needed for settlement.	
	4. Confirms set up of all locations and sends the Purchasing Entity the Welcome Packet that includes Purchasing Entity's Network assigned and WEX Site ID's.	
5. Contact Purchasing Entity's Equipment Provider to initiate a software download to complete the setup process.		
6. Run connectivity test with equipment vendor and network to assure transactions are authorizing and posting correctly.		
ONGOING		

Maintain the POS equipment.	Provide reporting of private site transactions in purchase reports	Provide processing support for the private site owner/operator
Notify WEX Merchant Operations of equipment changes, new additions, or software updates.		
Ensure security at the site.		

CERTIFIED EQUIPMENT VENDOR LIST

Below is a list of the current contacts at each of the respective equipment providers WEX works with for private site set-ups:

FUELMASTER	
Edye Michelle Coxwell Distributor Relations Coordinator	(800) 888-9136, ext. 1444 edye.coxwell@myfuelmaster.com www.myfuelmaster.com
GASBOY	
Pete Moyer Director of Sales	(757) 215-5893 pete.moyer@gilbarco.com www.gasboy.com
MULTIFORCE	
Keith Griesinger VP of Sales	(908) 419-0961 keithg@fuelforce.com www.fuelforce.com
OPW/PETRO VEND	
Bobby Hayes Control Product Manager	(770) 605-9611 robert.hayes@doverfs.com www.opwglobal.com
COMDATA/SMARTSITE	
Josh Connelly Inside Sales Manager	(615) 370-7207 jconnelly@comdata.com www.comdata.com

If a Purchasing Entity doesn't have equipment and they are interested in learning more, please contact one of the equipment providers above. For general questions about private site setups, contact WEX Merchant Operations at 888-660-8941 or merchantprocessing@wexinc.com

WEX PRIVATE SITE ENROLLMENT PACKET

Choose the Purchasing Entity's program:

Private Site: Complete sections A, B, C & if relevant, G

Private Site Rebilling: Complete sections A-E & if relevant, G

Sign and date the agreement

Email to: merchantapplications@wexinc.com;

or Fax to: 1-207-253-1379;

or Mail to: Merchant Operations
PO Box 639, Portland, ME 04101

Select all that apply:

☐ New Set-up – First time Setup

☐ Additional Site Set-up

☐ Additional Account Set-up
Adding accounts to already existing sites

Allow 3-5 Business Days for setup. WEX is unable to complete same-day setups.

A. ACCOUNT INFORMATION

Account Number (found on Purchasing Entity's billing invoice):
*(If more than one account, attach additional account information. **All** account numbers are needed in order to ensure correct set-up)*

Fleet name (legal name of business or DBA):

Fleet Contact (first name, last name):		Title:
Fleet Contact Phone Number:	Fax Number:	Email Address:

B. EQUIPMENT INFORMATION

Equipment Vendor (check one): ☐ ComData ☐ Fuel Master ☐ GasBoy ☐ MultiForce ☐ OPW/Petro Vend

Equipment Name, Model and Software (be specific):

C. SITE INFORMATION

Number of Sites:

Provide a list of sites with the following information: *(If more than one location, attach additional site information)*

Company Name:

Physical Address:

City:	State:	Zip:

Site Time Zone (check one): ☐ Eastern ☐ Central ☐ Mountain ☐ Pacific

Contact Name:

Phone Number: Email Address:

D. VISITING FLEET INFORMATION (Rebilling Only)

If the Purchasing Entity will be allowing fleets other than their own to fuel at their Private Site location(s), please provide the following information for each visiting fleet.

Account Name: Account Number: _____

Account Name: _____

Account Number:

Account Name: _____

Account Number:

E. WEX BANKING AUTHORIZATION FORM (Rebilling Only)

BANK ACCOUNT INFORMATION

Private site owner/operator hereby authorizes and requests WEX to make payments of amounts owing to private site owner/operator by WEX by initiating credit entries to private site owner/operator's demand deposit account at the Bank indicated below ("private site owner/operator's bank"), and authorizes and requests private site owner/operator's bank to accept any credit entries initiated by WEX to such account without responsibility for the correctness thereof. In the event of an overpayment or payment in error, private site owner/operator hereby authorizes WEX to initiate a debit entry to the account for each overpayment or payment in error. It is understood that for purposes of this Agreement, the term "private site owner/operator's bank" shall mean and include the bank identified below by private site owner/operator and any successor bank identified to WEX (i) in a Notice of Change provided to WEX by any Automated Clearing House Association processing credit or debit transactions under this Agreement, or (ii) by private site owner/operator, whether orally or by other non-written means. Any such notification to WEX shall be effective only with respect to entries credited to private site owner/operator's account by the Bank after receipt of such notification and a reasonable time to act upon such notice. Private site owner/operator agrees and acknowledges that WEX will not be liable to private site owner/operator for any damages resulting from the performance or the failure to perform of any Automated Clearing House Association. Funds from the visiting fleet transactions will be automatically deposited in the private site owner/operator's bank account via ACH 30 days after the transaction posts in the WEX system.

Bank Name and Address	ABA Routing Number
Account Name	Account Number

IMPORTANT: FOR REBILLING ONLY, PLEASE ATTACH A VOIDED CHECK

IMPORTANT: FOR REBILLING ONLY, PLEASE ATTACH A COMPLETED W-9 AND
IF A PURCHAING ENTITY HAS INCOME GENERATED FROM CALIFORNIA SOURCES,
THEY ARE REQUIRED TO COMPLETE AND RETURN FORM 590

WEX must receive a completed W-9 and Form 590 in order to process application.

AUTHORIZED SIGNATURE

PRIVATE SITE OWNER/OPERATOR: The undersigned represents and warrants to WEX that all of the terms and conditions of this WEX Private Site Program Application consisting of this entire document in addition to any other document or addendum including the EX Private Site Program Application have been reviewed in their entirety, are true and correct, and set forth the agreement between WEX and the private site owner/operator. Additionally, the undersigned represents and warrants that he or she has authority to sign and to bind Merchant to the terms of this Application. Also, the undersigned represents that the undersigned has the authority to provide information and execute this Application on behalf of the private site owner/operator. The Agreement shall only become effective upon WEX's acceptance of the Agreement and the Application at its headquarters following approval, and the assignment to private site owner/operator of a private site owner/operator processing identification number. The private site owner/operator further affirms that they are establishing a credit card processing relationship with the processor indicated on the attached WEX private site application. Once WEX begins processing credit cards through this processor, our company does not intend to process any transactions through a processing agreement with a branded petroleum marketer.

Signature	Printed Name
Title	Date

FOR WEX INC. INTERNAL USE ONLY	
Processed By	Date Processed
Settlement Entity	Site ID#

By signing and submitting this Private Site Agreement, the Purchasing Entity agrees to adhere to the WEX Private Site Card Sale Procedures incorporated herein as Exhibit A.

G. FEES

WEX shall charge the following fees:

(i) a set-up fee waived per site; and

(ii) a transaction fee of $0.15 for each card sale that is made using the private site owner/operator WEX charge card account.

(iii) a transaction fee of $0.15 for each WEX card sale that is made by a visiting fleet ("Foreign Transaction Fee") will be assessed to such visiting fleets for (iv) the purchases that they make using the sites set forth herein.

(v) WEX may increase the transaction fees, in its sole discretion.

☐ Check box if the Purchasing Entity has a separate negotiated rate under a Master Contract. Include the contract with their Private Site Agreement submission.

The contract is needed in order for set up to be completed.

H. MISCELLANEOUS

The parties agree that a signed facsimile transmission shall be considered valid for purposes of this enrollment form and satisfies the requirements of a signature or writing under applicable law. The undersigned represents and warrants to WEX that all the terms and conditions have been reviewed in their entirety, all information provided in this request form is true and correct, and he or she has been duly authorized to sign and to bind the private site owner/operator to the terms of this agreement.

Authorized Signature:

Title:

Date:

WEX PRIVATE SITE CARD SALE PROCEDURES

1. Method of Transmission Of Card Sales To WEX

A. MERCHANT shall have the necessary equipment to permit the electronic acceptance of the Card at its Distribution Sites including but not limited to their point of sale equipment and networking services.

B. MERCHANT shall collect and transmit the Card Sale data in accordance with the WEX Technical Specification. Merchant shall obtain from WEX the necessary acceptance certification for its network and equipment that will be used for processing sales transaction.

2. Minimum Card Sale Processing Requirements

A. Card Sale data sent to WEX shall include: account number, vehicle number, driver identification number, sales date, sales time, site identification number, authorization number, product code(s), quantity, total sales amount (in dollars), odometer, ticket number and any other information as WEX and MERCHANT may mutually agree upon. MERCHANT is responsible for the inclusion of any applicable taxes on the fuel when allowing a non-tax exempt fleet to utilize the fuel at its locations. WEX will not add any taxes to the total PPG of any private site transactions transmitted by MERCHANT.

B. All Card Sales require an authorization or approval from WEX. MERCHANT shall request such authorization from WEX for the total Card Sale amount prior to sending the Card Sale to WEX for processing.

C. WEX does not provide pre-authorizations, nor does it place available credit on "hold". If MERCHANT calls prior to completion of the services being provided to the cardholder, MERCHANT still needs to obtain an authorization number upon completion of the services or Card Sale to obtain payment from WEX.

D. An authorization or other approval code is not a guarantee that MERCHANT will receive payment. WEX does not provide payment to merchants based upon receipt of information during the authorization process. MERCHANT is still required to submit the completed Card Sale, including the authorization or other approval code, to WEX. Obtaining an authorization without submitting the completed Card Sale to WEX may result in non-payment by WEX for such Card Sale.

E. MERCHANT shall not accept payment through use of an expired Card or when advised upon authorization inquiry, that the Card is not to be honored.

F. MERCHANT shall never make a Card Sale when MERCHANT believes or has reason to believe that the Card may be counterfeit or stolen or the Card Sale is in any way fraudulent or otherwise suspicious.

G. Merchant shall maintain a record of all information required in Section 1.3.A above.

H. If the Card Sale is not an island card reader transaction ("pay-at-the-pump"), MERCHANT shall require the cardholder to sign the transaction receipt unless the total for the Card Sale is less than $25.

I. Any Card Sale data received by WEX from MERCHANT by 5:00 p.m. Eastern Time ("ET") shall be treated as having been received on the next business day.

J. MERCHANT shall not divide the price of goods and services purchased in a single transaction among two (2) or more transaction receipts for billing to WEX.

K. Merchant must not submit Card Sales until Products are delivered.

L. A Card must be present at the time of purchase. In the event that MERCHANT processes a Card Sale when the Card is not presented, MERCHANT bears the risk of the sale being charged back.

M. MERCHANT shall maintain a record of the Card Sale, including all sales data required for a period of **one (1) year**. Upon the reasonable request of WEX, such records shall be provided to WEX within **thirty (30) calendar days** of WEX's request. Failure to provide the requested record will result in a charge back of the Card Sale to MERCHANT.

3. Data Input and Transmission

A. Merchant is responsible for the data entry of Card Sale information by its personnel, or representatives. All data shall meet the WEX Technical Specification and shall be in good and usable condition.

B. If information pertaining to any Card Sale is garbled in transmission such that part or all of the record is likely to vary from what MERCHANT transmitted, WEX may advise MERCHANT of the suspected inaccuracy and request retransmission of the record or other appropriate confirmation. WEX may, with notice to MERCHANT, withhold payment for such Card Sales until the record is retransmitted or MERCHANT provides other appropriate confirmation.

C. If MERCHANT has not provided WEX with required information or that WEX needs to interpret, verify, or validate a Card Sale, WEX may, withhold payment for such Card Sale until MERCHANT sends WEX the necessary information. WEX may make appropriate adjustments in its settlements with MERCHANT to reflect the receipt or correction of any such Card Sale information. WEX shall provide notice to MERCHANT of any Card Sales that it is not able to process due to errors or missing information through its daily settlement reports.

D. MERCHANT shall submit all Card Sales to WEX for processing within **thirty (30)** days of the transaction date. WEX may accept transactions up to **one hundred and twenty (120) days** from the date of the transaction for processing and billing to the fleet, however, reserves the right to chargeback any such transaction that is disputed by a fleet customer.

E. MERCHANT authorizes WEX to refer to a default price per gallon table, which may be used when the calculated price per gallon for the transaction falls outside of WEX's acceptable range of pricing which is updated from time to time by WEX based upon market conditions. The table is based upon average price per gallon data collected from all merchants who accept WEX Cards.

F. MERCHANT authorizes WEX to refer to the authorization log to obtain information to complete the processing of transactions in the event that errors are detected by WEX during processing. It is understood by the parties that the information contained in the authorization log is the "actual, real-time" information received by WEX from the MERCHANT at the time the use of the charge card was authorized. If sufficient information is not available in the authorization log to correct any errors in the transaction file received by WEX from MERCHANT, then these transactions will be returned back to MERCHANT for correction.

G. Use of the defaults in Section 1.3.E and 1.3.F above does not affect the total transaction value submitted for settlement and is only used to facilitate reporting to fleet customers. It does not relieve MERCHANT of its requirements to provide accurate and complete data as set forth in 1.2.A for Card Sales.

WEX PRIVATE SITE CARD SALE FREQUENTLY ASKED QUESTIONS

How does it work?

Drivers swipe their WEX fuel cards through the Purchasing Entity's WEX-certified equipment reader and enter a Driver ID and the vehicle's odometer reading. The transaction information is transmitted by the network to WEX for approval. In a matter of seconds, a driver using an authorized card can begin fueling. All of the Purchasing Entity's transaction information appears on their WEX purchase report.

What equipment will a Purchasing Entity need?

A purchasing Entity will need to purchase a card reader (or upgrade existing equipment) to match WEX and network requirements (see certified equipment vendor list).

What is the cost?

There is a one-time set up fee that is waived and a $0.15 per transaction fee. Costs to purchase new card readers (or upgrade current equipment) vary by vendor so the Purchasing Entity will need to negotiate their purchase.

Are there other costs that might be associated with set up?

Depending on Purchasing Entity's chosen network and equipment vendors, there could be additional hardware and software costs. Please contact the Purchasing Entity's providers for more information.

How does a Purchasing Entity sign up?

Just complete the enclosed Private Site Agreement and submit it to WEX.

What equipment provider would WEX recommend?

WEX provides the Purchasing Entity with a certified equipment vendor list to choose from. The Private Site Owner/operator is responsible for the purchase and upkeep of the equipment.

Who do I contact with issues regarding incorrect product coding or reporting from the Purchasing Entity's equipment?

The Purchasing Entity's vendor or network will be able to ensure proper downloads and configurations are reporting correctly.

What is a network?

A network is a third party processor who sends a transaction files from the Purchasing Entity's equipment to WEX for electronic processing.

What information should a Purchasing Entity provide the network helpdesk if they need to call?

Be sure to have the Merchant/Terminal ID for the location the Purchasing Entity is calling for. This along with the Network Contact numbers can be found on the Welcome Packet received from WEX.

If a Purchasing Entity participates in Rebilling, how do they receive the funds for the fuel used by visiting fleets?

Upon enrollment, WEX will collect the Purchasing Entity's banking information to set up ACH payment. The funds for visiting fleet transactions will be automatically deposited in their account under the payment term of their contract.

If I allow visiting fleets to fuel at my location, how will I be able to keep track of those transactions?

Each month, WEX will send you a private site merchant report. The report will provide detail on all visiting fleet transactions. In addition, your transaction detail report will include both local and visiting fleet transactions.

WEXPAY ENROLLMENT PACKET

FAX to: _____ **FAX #: _____**

1. Complete parts A and B.
2. Be sure to sign the form and keep a copy for the Purchasing Entity's records.
3. Fax completed form to: 1-800-516-7536.

A. ACCOUNT INFORMATION

Account Name:	Account Number: 04
Authorized Fleet Contact:	Phone No.:
Fleet Contact email:	Fax No.:

B. SETUP INFORMATION

Complete the below items:

_____ Number of Alternative Authorization Instruction cards needed. (WEX recommend at least one per driver using WEX*Pay*)

$_____ How much spend does the Purchasing Entity anticipate? (Credit line may need to be reviewed)

C. TERMS AND CONDITIONS

These terms and conditions supplement the WEX ® Business Charge Account Agreement (the "Agreement") between the Purchasing Entity and WEX Bank ("Issuer"). The following additional terms and conditions shall be applicable to their account upon their completion and WEX's acceptance of this WEX*Pay*™ Request form. The Participating Entity's continued use of their account and the product referenced herein constitutes acceptance of these terms and conditions. All capitalized terms shall have the same meaning as in the Agreement, as amended from time to time.

Issuer will provide single use virtual MasterCard® Cards for purchases made by the Purchasing Entity only at U.S. merchant locations that do not accept the WEX® Universal Fleet Card. A virtual card is one where there is no plastic issued, only card numbers. Single use virtual cards may be used for purchases one time only. MasterCard International's chargeback rules apply. The Purchasing Entity's MasterCard purchases will appear on their WEX® Universal Fleet invoices. The Purchasing Entity agrees to
pay and/or perform, as the case may be, when due all indebtedness, obligations and liabilities of each MasterCard account established pursuant to this request of every kind, nature and character whatsoever, including, without limitation, (i) all amounts payable under each account, (ii) all obligations, covenants, and agreements contained herein. Purchases are due and payable in full by the Purchasing Entity upon billing in accordance with the terms of credit Agreement with Issuer.

In the event the Purchasing Entity currently participates in any rebate or discount program offered by Issuer for the WEX® Universal Fleet card purchases, their purchases made using WEX*Pay*™ will apply to such rebate or discount provided they meet any conditions of such rebate or discount program.

Issuer reserve the right to modify or terminate WEX*Pay*™ at any time upon 15 days notice to the Purchasing Entity.

Issuer will provide WEX*Pay*™ Alternative Authorization Instruction card for the Purchasing Entity's distribution to their drivers. When their drivers present the Alternative Authorization Instruction card to a merchant, the merchant may, at the merchant's discretion and their own risk, either complete the work or contact Issuer to validate the Purchasing Entity's account. Issuer will not pre-authorize the transaction if the work has not been completed but WEX will provide the merchant with a reference number so that they may contact WEX upon completion of the work for payment authorization. In order to validate the Purchasing Entity's account WEX must preview their account information and this may affect their control limits, if the Purchasing Entity has set them on their account, including the number of transactions available per day and the total daily dollar limits. The Purchasing Entity should check their current controls (if any) to be certain that they have sufficient limits for these transactions. If they make any changes or set any control limits, the Purchasing Entity agrees that WEX is authorized to rely on such changes and WEX will not be responsible for any losses resulting from such changes. The Purchasing Entity will also agree that WEX will not be liable to the Purchasing Entity for any loss, liability or damages they suffer which arise from, are related to, or are in any way connected with any fraud control or purchase restrictions such as Authorization Controls which WEX implements from time to time. WEX is not liable on account of any merchant's refusal to honor the MasterCard or to participate in the WEX*Pay*™ process, regardless of the reason.

The person signing this Out-of-Network Authorization Process Request represents and warrants that he/she is authorized to execute this Request.

X Authorized Fleet Contact Signature:	Date:
Print Name:	Title:

EXHIBIT F

DEFINITIONS

This exhibit provides definitions of terms used throughout this Master Agreement and exhibits.

Account: For purposes of this Master Agreement, cards do not represent an individual account. Accounts are established within the WEX system in the Participating Entity's hierarchy where the cards are issued from. The Account contains the overall credit line and authorization controls that are applied to one or many cards.

Account Coordinator: Employee of the Contractor assigned to a Participating State or Purchasing Entity to provide day-to-day assistance with regard to program card maintenance.

Annual Volume: Total volume spend by all Purchasing Entities within a Participating State for all card liability products in a calendar year.

Applicable Taxes: Federal, state, county and/or local taxes levied on the purchase of gasoline or diesel fuel that may be eligible for tax emption by the Contractor.

ASC X12: Official designation of the U.S. national standards body for the development and maintenance of Electronic Data Interchange (EDI) standards. Also known as ANSI ASC X12.

Associations: Group of card-issuing banks or organizations that set common transaction terms for merchants, issuers, and acquirers. Some major associations are Visa, MasterCard American Express and Discover. Also referred to as Network.

Authorization Controls: Controls that are established in the WEX system and assigned to every card to determine the purchasing rules for cards assigned to the given control profile. Like an Emergency Card, emergency authorization controls can also be established.

Authorized User/User: Representative of Purchasing Entity that leverages a Commercial Card, manages Commercial Cards, and/or accesses the online system

Automated Clearing House (ACH): Central distribution point for transferring funds electronically for participating depository financial institutions. Transactions are accumulated and sorted by destination for transmission during a predetermined period. It includes small dollar payments in large transaction volume.

Bank Overrides: A transaction that has been pushed through by the Contractor.

Basis Points: Unit of measure for incentive share/rebate rates. One basis point is equal to $1/100^{th}$ of 1% or 0.01% or 0.0001.

Bidder: Any entity submitting a bid or response to the solicitation

Billing Cycle: A specific recurring time period between the time statements of account/invoices are processed.

Card Issuer: Financial institution issuing a Commercial Card or account. Also referred to as a card issuer, card provider or bank. For the avoidance of doubt, Contractor shall be the sole Card Issuer under the Master Agreement and Participating Addenda.

Card User Agreement: Agreement between the Purchasing Entity and awarded Contractor verifying credit availability, account information, and agreeing to the terms and conditions of the Master Agreement and Participating Addendum.

Cardholder: An employee, contractor, or representative of a Purchasing Entity to whom a Commercial Card is issued for making designated business purchases/payments on behalf of his or her organization.

Card-less Accounts/Ghost Cards: Accounts that have no plastic card issued, only an account number to which the acquisition of goods and services are charged.

Centrally Billed Account: Card accounts are billed to the Purchasing Entity or program within a Purchasing Entity. CBA accounts are paid directly by the Purchasing Entity.

Client-held Days: Number of days from the billing cycle date to the date payment is received.

Commercial Card: Generic term for any card product used by organizations for making payments for various goods, services and business expenses.

Contractor: The entity/entities awarded a Master Agreement and/or Participating Addendum(s) as a result of the evaluation of the bids received in response to a solicitation.

Corporate Liability: Purchasing Entity is liable for all card transactions and fees.

Credit Application: WEX form to establish a credit line with WEX Bank and adhere the contractual terms & conditions of this Master Agreement to the Purchasing Entity.

Declined Transaction: Transaction where authorization has been refused by the Card Issuer's transaction authorization system.

Duplicate Transaction: a transaction that has been processed twice for the same purchase.

Department: Functional business unit of an organization such as purchasing, accounting, human resources, etc.

Department Card: Card issued to a department rather than a specific cardholder.

Declining Balance/Managed Spend Card: Specialized Purchase Card with a pre-set spend limit and expiration date that is typically non-replenishing. Also referred to as a Controlled Value Card.

Electronic Payables: A form of electronic payment, utilizing the card infrastructure, managed centrally within an organization, typically by accounts payable. Also known as electronic accounts payable (EAP), automated payables, e-payables, Virtual Payment Cards, push payments, straight through payments 9STP), buyer-initiated payments (BIP), supplier/vendor card, single-use accounts and

electronic invoice presentment and payment (EIPP). Each provider has a proprietary name for its solution; functionality and processes vary for each.

Eligible Purchaser: A Purchasing Entity authorized pursuant to the execution of a Participating Addendum.

Emergency Card: A type of Commercial Card that is always open, active and ready for use. Usually equipped with high or no credit limits and are used in emergency response situations.

Entity Program Administrator(s): A common role responsible for various administrative tasks (i.e., ongoing operations) in a typical Commercial Card program, including card issuance, account maintenance, card cancellation and reporting.

File Turn: Number of days from the date a transaction is posted to an account to the date payment is received.

Fleet Card: Specialized Commercial Card used to capture fleet-related expenses and vehicle data (e.g., fuel, vehicle maintenance, repair, and service).

Foreign Transaction Fee: A charge applied to purchase made in foreign countries (outside the United States). Purchases made online from your home country where the vendor is foreign and processes the transaction in its local currency.

Fraud: Unauthorized use of a card, resulting in an acquisition whereby the Purchasing Entity does not benefit.

Implementation: Process of putting all card program functions and activities into place.

Interchange Rate: A rate, set by the Network (i.e., Visa, MasterCard, Discover, American Express), collected by the card issuer to cover the cost of processing the transaction.

Lead State: State responsible for soliciting for and managing the awarded Master Agreement.

Level 1 Data: Standard commercial transaction data that includes the total purchase amount, the date of purchase, the merchant category code, merchant's name, city/state, debit/credit indicator, date transaction/credit was processed by the Contractor, Contractor processing/transaction reference number for each transaction/credit, and other data elements as defined by the Associations or similar entity.

Level 2 Data: In addition to Level 1 data, includes sales tax amount, company information, and other data elements as defined by the Associations or similar entity.

Level 3 Data: In addition to the Level 2 data includes cost, quantiles, unit of measure, product codes, product descriptions, and ship to/from zip codes, freight amount, duty amount, order date, discount amount, order number and other data elements as defined by the Associations or similar entity.

Master Agreement: Underlying agreement executed by and between the Lead State and the Contractor, as now or hereafter amended. May also be referred to as contract or Master Contract.

Master Agreement Administrator: Employee of the Lead State responsible for soliciting for and managing the awarded Master Agreement

Master Agreement Authorized Representative: Employee of the Bidder authorized to sign bid submittal documents, provide bid clarification responses, and function as the primary point of contact during the solicitation and evaluation.

Merchant Category Codes (MCC): A system of four-digit codes, maintained by networks, used to identify a merchant's principle trade, profession or line of business; a MCC is assigned to a merchant by the merchant or merchant acquirer.

Merchant Negotiated Transaction: Transaction completed with a merchant that has an agreement with the Association to complete theirs at a lower than standard interchange rate.

Merchant Negotiated Volume: Total quarterly merchant negotiated volume spend by a Purchasing Entities for all card liability products in a Quarter.

Merchant Overrides: A transaction that has been pushed through by a merchant location.

National Annual Volume: Total annual volume spend by all Participating States/Purchasing Entitles for all card products in a calendar year.

National Annual Volume Incentive: Rebate or Incentive Share earned by a Participating State based on their contribution to the National Annual Volume.

Network: Entity that facilities the movement of transactional data between the Card Issuer and acquirer and sets merchant rules for card acceptance. Organizations in this role include Visa, MasterCard, American Express and Discover. Also referred to as Association.

Non-Standard Volume: Transactions that are processed using Reduced Interchange Rate as determined through an agreement between the merchant and the Association.

Participating Addendum: An agreement signed by the Contractor and a Participating State that incorporates the Master Agreement and any other additional Participating State specific terms and conditions.

Participating Addendum Administrator: Employee of the Participating State responsible for the management and administration of the Participating Addendum.

Participating Addendum Authorized Representative: Employee of the Participating State authorized to sign the Participating Addendum.

Participating State: Any State, territory or entity (authorized by a state's chief procurement officer) that chooses to execute a Participating Addendum under the awarded Master Agreement. May also be referred to as Participating Entity.

Participating State Annual Volume: Total annual volume spent by a Participating States for all card products in a calendar year.

Product Code (PC): A unique identifier, assigned to product types (e.g. maintenance, tires, etc.) within a Fleet management system.

Program Administrator(s): Refers to Participating Entity, Purchasing Entity, or Statewide Program Administrators.

Program Administrator Overrides: A transaction that has been pushed through by a Program Administrator.

Prompt Payment Incentive: Rebate or Incentive earned by a Purchasing Entity based on their average speed of pay/file turn days.

Purchasing Entity: Any eligible organization executing a Card User Agreement as allowed by a Participating Addendum under the Master Agreement.

Quarter: Three (3) month period based on the yearly calendar as follows:

Quarter 1(Q1) – January, February & March
Quarter 2 (Q2) – April, May & June
Quarter 3 (Q3), July, August, September
Quarter 4(Q4) – October, November & December.

Quarterly Non-Standard Volume: Total Non-Standard Volume sales for a Quarter.

Quarterly Non-Standard Volume Incentive: Rebate or Incentive Share earned by a Purchasing Entity based on their Non-Standard Volume sales for a Quarter.

Quarterly Standard Volume: Standard Volume sales for a Quarter.

Quarterly Standard Volume Incentive: Rebate or Incentive Share earned by a Purchasing Entity based on their Quarterly Standard Volume.

Quarterly Total Volume: Total quarterly volume spend by all Purchasing Entities for all card liability products in a Quarter.

Relationship Manager: Employee of the Contractor assigned to a Participating State or Purchasing Entity to provide day-to-day assistance with regard to program card maintenance.

Reduced Interchange Rate: A lower interchange rate for processing Commercial Card transactions.

Standard Volume: All transactions, less Non-Standard Volume, fees, cash advances, convenience checks, Fraud, chargebacks and net of Write-Off Adjustments.

Statement/Invoice: Document reflecting account details for the billing period including debits, credits, transaction detail and balance due.

Statewide Program Administrator: Employee of the Participating State who administers the State's Purchase Card and or Fleet Card Program(s)

Transaction: Exchange between cardholder and merchant, payment for goods and/or services.

Virtual Cards/Single Use Card: One time use account numbers.

Write-Off: A cancelled account with an unpaid balance determined to be uncollectible by the Contractor. Accounts are considered uncollectible once delinquent for one-hundred-eighty (180) days after billing cycle close date. At the Contractor's discretion, collection action may continue on these accounts.

EXHIBIT G

FLEET CARD SERVICE REQUIREMENTS

This exhibit details Fleet Card service requirements and Contractor responses to how these requirements will be met as submitted with their bid.

1. RESERVED – Identifies card products available in Exhibit A.

2. ADMINISTRATION OF ACCOUNTS

2.1 System must allow for Program Administrator to setup new accounts online – including ordering and registering cards, establishing User ID and password.

2.2 System must allow for Program Administrator to add, edit, or remove single or multiple Product Codes (PC) or Merchant Category Codes (MCC) from multiple card accounts at once.

2.3 System must allow for Program Administrator to initiate one-time overrides per transaction.

2.4 System must allow for Program Administrator to establish roles, access, and authority levels for all user types (i.e. managers, approvers, cardholders) within the Purchasing Entity.

2.5 System must allow for Program Administrator to unlock system access, reset User ID and reset password for any User within the Purchasing Entity.

2.6 System must allow for Program Administrator to see changes made to a card profile and who made those changes.

2.7 System must allow for system to allow Program Administrator to view cancelled, deactivated and suspended cards within the Entity.

2.8 System must allow for Program Administrator to order and issue replacement cards (singular or multiple simultaneously) online.

2.9 System must allow for Program Administrators and Cardholders to access statements online.

2.10 System must allow for Program Administrators and Cardholders to mark accounts for paper or paperless statement delivery.

2.11 System must notify Program Administrators and Cardholders of statement availability.

2.12 System must allow for Program Administrator and Cardholders to check status of cards and view account information including but not limited to:

- balances
- limits
- charges
- declined transactions
- spend history
- default accounting codes
- demographics

2.13 System must allow for the Program Administrator to choose the billing cycle close date for the Purchasing Entity. The billing cycle date will be established at account implementation and will be set for the Purchasing Entities' agreement period.

2.14 System must have the ability to roll-up billing to managing account level or bill at department level as determined by the Purchasing Entity.

2.15 System must display all transactions in US Dollars.

2.16 System must be able to restrict fuel type at the card and/or vehicle level by not allowing the wrong fuel type to be purchased and by being able to report exceptions for wrong fuel type.

2.17 System must be able to apply hard limits on quantity (gallons) of fuel dispensed.

2.18 System must be able to restrict maintenance purchases.

2.19 System must allow for Program Administrator to reset Driver PIN online and in real time.

2.20 System must have the ability for Program Administrator to set/change PIN for each driver and/or vehicle.

2.21 System must be able to provide federal fuel tax exemption prior to invoicing.

2.22 Reserved, see Exhibit D Establishing an Account.

2.23 System must allow for Program Administrator to edit User ID, role and authority level online.

WEXOnline® allows the Program Administrator, or other individuals with appropriate permission levels, to add/edit new online users, manage existing users, and manage online enrollment requests. The module also allows for a prospective user to self-enroll online and have their request route to a Program Administrator to be approved and have the appropriate level of access assigned to them by the Administrator. A prospective user is not granted any level of access until after their request has been approved by a Program Administrator and their level of access is assigned.

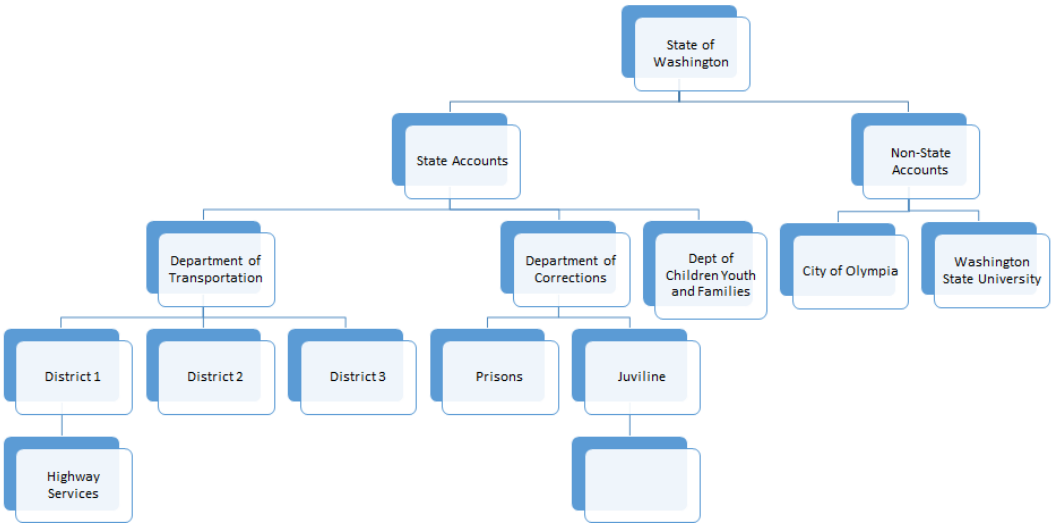
The administrator retains ultimate control over access and assignment of roles, authority level and privileges allowed online. The module contains prepopulated templates for roles with varying levels of permissions available online to control the access an individual may have for their given job duty. The module also allows for users to create custom roles for levels of access specific to an individual or job duty. This creates appropriate account and system access, based on user responsibilities; ultimate control over who has access to the module, what level of access, and to what accounts; and the ability to track user logins.

Additionally, WEXOnline® allows users to reset their passwords on their own should they need to do so. This allows for a greater level of control at the user level and helps minimize the need to reach out for assistance with a reset.

2.24 System must have a minimum of seven (7) program hierarchies.

WEX's system allows for robust account structures and reporting functionality. WEXOnline® supports nine (9) levels of hierarchy, providing a high level of detail and flexibility. The levels of hierarchy are customizable to the set-up of an individual entity participating in the contract to meet their specific needs.

For example, the State of Washington could be set up as a level 1 (L1) account with multiple L2 accounts hanging off of the overall contractual relationship. The accounts under the L2 would then have the ability to structure the departmental breakdown unique to that agency or entity.



- Identifying accounts:
  - Accounts can be identified in multiple ways in WEXOnline®. WEX offers custom reporting, account search functionality, and visual hierarchy layouts that are collapsible for finding and identifying accounts. Reporting can also offer account details about the account with the hierarchy regarding addresses (shipping, billing, primary and physical) total drivers and/or vehicles, total cards, default authorization profile, and primary shipping method and carrier.

- Reporting rebate earnings:
  - WEX does offer rebate reporting that provides a full breakdown of rebate for a given time period. WEX will work with states at implementation to get the appropriate rebate reporting set-up to cover their needs.

- Reporting transaction data:
  - All WEX transaction data is available within WEXOnline® to view and is reportable through the system. Additionally, WEX offers custom files and file interfaces to provide transactional data to customers. Below are several templated examples of how transactional data as well as authorization data can be accessed in WEXOnline®.
    - Custom Report/ Authorization Activity – This template helps users build a custom report with a direct view of authorization activity, including declines transactions.
    - Custom Report/ Transaction Management – This template permits users to generate a transactional-level report, whereby a user may analyze usage at certain merchants, or within certain timeframes, or exceeding specified dollar amounts and more.

2.25 System must allow for a Statewide Program Administrator account with access to view and pull reports for all transactions made by Purchasing Entities within the Participating State under this Master Agreement.

WEXOnline® allows for a Statewide Program Administrator with access to view and pull reports for all transactions made by Purchasing Entities within the Participating State under this Master Agreement. This would be accomplished by providing the administrator with an access role rooted at the top of the hierarchy. This can be accomplished through either the templated roles available within the module or creating a custom role should it be required.

2.26 System must allow for Program Administrator to simultaneously activate, deactivate, suspend, and terminate cards online.

WEXOnline® allows the Program Administrator to update cardholder and vehicle information online, including simultaneously activating, deactivating suspending or terminating cards. This is accomplished by providing the administrator with edit access to vehicle/cards and driver information. The administrator can select multiple cards and then choose to activate, deactivate, suspend or terminate these cards simultaneously. Additionally, through the account support provided by WEX, an agency can also send large amounts of data to the WEX Premium Fleet Services Account Manager to handle for them on their behalf. For example, if a State's motor pool had a large amount of new vehicles incoming or old vehicles being sold, the agency's fleet manager could send a spreadsheet of the information to WEX to activate, deactivate, suspend or terminate cards on the State's behalf. This often helps save time, energy and resources in a given agency.

2.27 System must allow for Program Administrator to update all cardholder information online, unless barred by Federal Regulation.

WEXOnline® allows the Program Administrator to update all cardholder and vehicle information online. This is accomplished by providing the administrator with edit access to cardholder/driver information. Additionally, through the account support provided by WEX, an agency can also send large amounts of data to the WEX Premium Fleets Services (PFS) Account Manager to handle for them on their behalf. For example, if a State agency had a large amount of seasonal workers coming on again to work, the agency's fleet manager could send a spreadsheet of the information to WEX to activate, deactivate, suspend or terminate drivers/card holders on the State's behalf. This often can help save time, energy and resources in a given agency. WEX Fuel cards are not individual liability cards, so WEX is not aware of any Federal Regulations preventing the editing of cardholder information online.

2.28 Throughout the life of the Master Agreement and associated Participating Addendums, Purchasing Entities may have reason(s) to cancel a card (or a group of cards).

Cards or groups of cards can easily be canceled within the WEXOnline® module. Cards can be found under the Fleet Manager tab, administrator can search to find the card or group of cards an authorized user may want to cancel. Once a card has been reported lost, stolen, canceled, suspended or otherwise inactive, it is immediately invalidated in the WEX system. As stated above, this can be accomplished in WEXOnline® or by contacting the fleets Premium Fleet Services Account Manager or by calling WEX's 24/7 customer service. After cancellation, all electronic authorizations associated with the card are declined at the time a purchase is attempted. Additionally, once WEX receives proper notification, the fleet is relieved from liability for any subsequent charges.

2.29 When a card (or group of cards) is closed, a credit may be due to the card based on an overpayment, transaction credit, or something similar.

WEX's receivables department reviews all credits on termed accounts and cards 90 days after termination. If the credit qualifies for a refund, WEX will process that transaction and send a check for closed accounts or post a credit to an account, if it is a cancelled card within an active account.

The timeline for a credit to post to an account can vary. This is due to the nature of the credit. For example, in some cases a WEX representative may be able to confirm immediately that a credit is owed. In other cases WEX may need to do additional research or contact a merchant to

verify additional information. WEX always works to resolve any owed credits as quickly as possible. Once the credit is confirmed to be owed to the customer, it is posted to the account and it will be reflected as a credit on the next invoice in the billing cycle. Should the customer require payment for the credit, WEX will process the credit for payment which typically takes 3-5 business days.

2.30 Foreign Transaction Fee

For US-based WEX card programs, the WEX system recognizes an assigned originating site ID and/or country code, provided to WEX by the merchant, for the corresponding country of origin of a transaction.

For example, if an agency transacted in Canada, WEX would receive the transactional data that would include a site ID, country code or similar identifying code, provided to WEX by the merchant, for the site. The WEX system would then compare that transaction's location against the merchant location's country of origin, in this case being Canada.

The check in the WEX system is also tied to the currency. For US-based WEX card programs, the currency is based in US Dollars. If a transaction comes through in Canadian Dollars, the WEX system would flag that transaction and assess the associated Foreign Transaction Fee.

Foreign Transaction Fees are denoted in WEX reporting to reflect the appropriate amount invoiced to a customer, versus what may show on a customer's point of sale receipt from a merchant.

2.31 System must be able to route transactions through approval/workflow path as established by the Program Administrator.

WEXOnline® provides the ability to route transactions through an approval workflow path. The user roles required for this functionality and the process flow is outlined below.

An eligible approver is a User within a hierarchy who

- has the Approve Transactions permission
- has opted in to receive approval emails
- is an active online user
- a Fleet Manager/Program Administrator. A Fleet Manager will have all of the Manage Transactions features and functionality including the Approve Transactions permission
- or, have a Custom Role that includes the Approve Transactions permission only.

For those responsible for *reviewing* transactions:

These users will have Manage Transactions without the Approve Transactions permission. They:

- can filter transactions
- can view transactions
- can change transaction status as follows:
  - None → Follow Up
  - None → Reviewed
  - Follow Up → None
  - Follow Up→ Reviewed
  - Reviewed → None
  - Reviewed → Follow Up
  - will have all other existing manage transaction functionality (including upload receipt,

reallocate, notes, view history)
- If there is an eligible approver at and/or above the reviewing user in the hierarchy, the user can see the "Email Approval Request" button and send an email to those Approvers.

For those responsible for approving transactions:

These users will have a Custom Role with the Approve Transactions permission that allows them to:

- filter transactions
- view transactions
- change transaction status as follows:
  - reviewed → approved
  - reviewed → follow up
  - approved → reviewed
- receive and read approval emails sent from a User at and/or below their level in the hierarchy as long as long as the user has opted in to receive Approval Emails

Or, they can be assigned a Fleet Manager/Program Administrator role so they:

- can do everything available in the Manage Transactions
- Fleet Manager/Program Administrators also have the ability to change permissioning or access to allow for substitution scenarios when the approver role maybe out on vacation or leave allowing another user who is either new or would have a lesser role normal to step in an approve transactions in the Fleet Manager/Program Administrators absence.

2.32 System must allow for Program Administrator to add, edit, or remove security features (temporarily or permanently) in real time at the card account level including, but not limited to:

- dollar per transaction limit
- maximum daily/weekly/monthly spend
- transactions per day/week/month limit
- pay at pump only
- tank capacity limit
- type of fuel, by individual vehicle
- authorized State or Province
- Product Code (PC) blocks

The WEX system and the Fleet Manager module of WEXOnline® allows the fleet manager to add, edit, suspend, reactivate, and terminate cards and drivers, to add and manage card controls, and to view and download invoice details, card by card or simultaneously among a grouping of cards. The Program Administrator has all the capabilities requested above, the ability to do so in real-time and simultaneously to multiple cards. Pay-at-pump ONLY functionality is systematically supported by WEX but cannot be done online. This is supported by the WEX Customer Service team on request or during account set-up at the time of implementation. Product code blocks are achieved by our product-type controls in the authorization profile card is assigned. These can be changed, created and applied in real-time and simultaneously to multiple cards.

Users can also:

- Assign card to driver, vehicle or location
- Transfer cards from one account to another
- Group cards into authorization profiles to enforce purchasing policies

- Create organizational units or departments to better organize cards, vehicles and drivers for reporting and management purposes (initially added during implementation phase)
- Edit account information

WEXOnline® is structured to provide the ultimate flexibility to meet unique account program needs. The Administration module of WEXOnline® allows the fleet manager to create custom roles that can be assigned to online users to limit or broaden access into the system. The fleet manager can create custom roles which provide users with access to different sections – like the driver section. This setup allows them to focus on their defined tasks without giving broader permissions that could be abused.

Authorization profiles are the purchasing control parameters, or limits, that fleet managers assign to cards. This allows for easy management of the program to ensure purchasing policies are enforced each time a card is used.

WEX offers the flexibility for the fleet manager to name the authorization profiles via numeric or alphabetic naming scheme. For example, one group of profiles could be named "sedan," and the profile could be applied to that group of vehicles. Or, the profile could be called "delivery driver," and be set up for that type of employee. The fleet manager can assign as few or as many profiles as necessary

Fleet managers can add new profiles, view existing profiles, view cards assigned to each profile, clone, edit or modify the values, change the status of the profile, set account defaults, and reassign cards to other profiles.

Authorization control profiles allow the fleet manager to edit a profile and have that change impact all cards associated with that profile. There is no limit to the number of cards that can be assigned to a certain profile and this functionality eliminates the need to manually edit each driver or vehicle record when a policy changes.

Benefits include centralized account management; efficient administration of cards, driver, vehicles and authorization controls; and quick link navigation to all management features and functions.

2.33 System must allow for Program Administrator to assign card (with an identifying PIN or VIN number) to a driver, vehicle, department, etc. as determined by the Program Administrator.

A WEX card can be assigned to a vehicle/asset, driver, or organizational unit (or cost center) in the fleet, enabling the card to capture and track all purchase activity. This flexibility allows a Fleet Manager/Program Administrator to assign a card (with an identifying PIN (Driver/Vehicle ID) or VIN number) to a driver, vehicle, department or any other entity, asset or individual needing a card as determined by the Program administrator. When the card is swiped at the point-of-sale device, the driver is prompted to enter a Driver ID (DID), or PIN as referenced in the requirement, and the odometer reading of the vehicle in order to receive authorization for the ensuing transaction.

Each DID can be assigned to one, many, or all cards on the WEX account and can be generated by WEX at random, or assigned by the fleet customer. This 4- or 6-digit DID can be assigned to a driver, vehicle/asset, or organizational unit on the WEX account (based on the type of card preferred to use). For example, if Purchasing Entity decides to assign the card to the driver, the driver would typically enter a DID associated with the vehicle. If Purchasing Entity prefers to assign the card to a vehicle, typically the DID is associated with the driver.

The DID, combined with the card and account validation rules, is queried against the WEX database for verification and transaction authorization. If valid, the transaction is authorized. The WEX card cannot be electronically activated without entering a valid DID, making the card useless to someone who has found or stolen it and does not know the DID. The authorization process acts as a security measure, and provides a layer of protection against fraudulent activity.

2.34 System must allow for Program Administrator to create an approval path of setting specific card limits higher than Entity established limits.

2.35 System must allow for Program Administrator and/or Cardholder to mark transactions sent to accounting for payment.

2.36 System must be able to send notifications of pending approval(s) based on established approval path.

2.37 System must allow for Program Administrator to lock transaction accounting code data from editing.

2.38 If capable, system must allow for Program Administrator to create templates for card/account set up (i.e. same billing address, TIN, workflow, etc.).

The WEX system allows for templates with different functions within the site as well as the ability to utilize "clone" functionality, which acts in the same manner as a template. Cloning functionality exists for card and authorization profile information to leverage like information (address, cost center, TIN, org/department, user defined fields, etc.) associated between card or driver types.

- Templated default limits for authorization profile & set-up
- Clone function

The WEX team lead by an assigned Strategic Relationship Manager and Premium Fleet Services Account Manager will work to set-up and establish these with customer during the initial implementation. For needs that arose after implementation the Premium Fleet Services Account Manager will be able to assist in setting up these functions.

2.39 If capable, system must allow for Users, with multiple roles within a program, (i.e., Cardholder & Program Administrator) to opt to have one login to be able to access all aspects of their accounts (dual role). If yes, provide details on how that functionality works/is implemented.

The flexibility of the WEXOnline® module allows for each user's User ID to have one assigned role. However, this requirement can be met by creating a Custom Role with all necessary levels of permissions to support scenarios where a user maybe both a cardholder and Program Administrator or have other roles and responsibilities with a given agency. Another example is when the user is a cardholder who also carries financial responsibilities and also need to access the system for pulling invoices and reporting, and making payments. The module allows for this user's access to be customized to the specifications specific to their job function.

3. DATA COLLECTION AND MANAGEMENT

3.1 System must capture and display transaction data at the following minimum levels:

- Cardholder
- Approving official
- Entity office or unit
- Account/billing (available at different levels)

- Entity Program Administrator or alternates (available at different levels)
- Participating State (all state entity transactional data, statewide administrative level and compliance review group)

3.2 System must have the ability to view transaction authorization/declines in real time.

3.3 System must post transactions within twenty-four (24) to forty-eight (48) hours of receipt from merchant.

3.4 System must have the ability to capture and display Level 1, Level 2, and Level 3 transaction data as made available from the merchant.

3.5 System must allow for Users to add notes, comments, and additional descriptions to a transaction in a separate field. This field must:

- Allow for alpha, numeric, and special characters.
- Be searchable
- Be reportable
- Be accessible to all hierarchies within the system

3.6 System must be able to capture and display merchant Tax Identification Number (TIN) or similar unique identifier.

3.7 System must allow for user to input a minimum of 150 character of Entity defined accounting code structure/segments at the transaction level.

3.8 System must allow for the Purchasing Entity to set requirements for accounting code segments (i.e. mandatory, non-mandatory, etc.)

3.9 System must allow for Purchasing Entity to define, edit, maintain, and upload valid value tables for each accounting code segment.

3.10 System must actively validate accounting segment data against valid value table data as determined by the Purchasing Entity.

3.11 System must allow for Program Administrator to assign, edit, and delete "default" accounting codes for all program hierarchies within the Purchasing Entity.

3.12 System must allow for User to save and edit frequently used accounting codes.

3.13 System must allow for a minimum of 99 accounting code splits per transaction.

3.14 System must allow for User to manually enter tax detail at the transaction level.

3.15 System must allow Program Administrator to download the entire Fleet Card number for use in other systems.

3.16 Participating States and Purchasing Entities have a need to access past transaction detail data in real time for a minimum of thirty-six (36) months throughout the life of the Master Agreement and Participating Addendum.

WEX's system maintains past transactional data for a period of seven years (84 months). In the WEXOnline® module, files are retained for a period of 24 months. WEX's Premium Fleet Services Account manager can fulfill requests from NASPO participating entities for transaction details going back to 84 months.

In addition, WEX Fleet ClearView™ data analytics module has no cap on accessible data, so users of WEX Fleet ClearView™ Essentials and Snap modules, offered as part of WEX's core product

offering at no extra cost, are able to access past transaction data for a minimum of 36 months throughout the life of the Master Agreement, as required.

3.17 Templates/defaults

At the time of account set-up and during implementation, WEX can establish user-defined fields with a State or Agency. User-defined fields can be used for any information or data the State or Agency may wish to capture. For example, as it relates to accounting information, a user defined field can be created for a particular GL Codes or set of GL codes and made a mandatory field as part of the card set-up template a user will have to complete in order to place a card order. This ensures the data will be assigned to it can be reported against. These fields can also be added, removed or edited after the account set-up as well given the user has the appropriate permissions to do so.

3.18 System must allow for user to upload and attach supporting documentation to the transaction in the following formats (at a minimum): pdf, jpg, png.

WEXOnline® Receipt Upload feature supports the uploading of supporting documentation to a transaction in the following file formats: .png, .jpg, .gif, and .pdf. Additionally, WEX has the ability to add support for more file types for upload should an agency require it. WEX will work with agencies should there be a file format they may need.

3.19 Contractor will be required to work directly with Participating State to develop effective strategies to address product code errors with merchants.

WEX routinely works with merchants, the processing networks, and point-of-sale providers to ensure product code accuracy and address issues. Once WEX becomes aware that there is an issue with a merchant(s), we work with all parties involved to identify the root cause and remediate it. For customers whose tax exemptions may be negatively impacted by a product code error, if WEX is able to definitively validate the product that was actually purchased, WEX will perform a transaction correction to ensure that either the exemption or reported taxes are accurate.

WEX also employs other tools, like WEX Fleet ClearView™, to assist both our Merchant Services Team, this team is responsible for working with merchants, networks and point of sales providers to remediate issues like product coding errors, and our customers to actively catch errors in merchant data, like bad product codes.

WEX Fleet ClearView™ is a dynamic a suite of powerful, cloud-based analytics solutions that automatically organizes, interprets, and intuitively displays fleet-related information. Critical data is presented in an intentional layout of simple and informative visualizations, helping fleet managers monitor operations, uncover card misuse and potential driver theft, understand trends, benchmark performance, investigate anomalies, and recognize cost-saving opportunities.

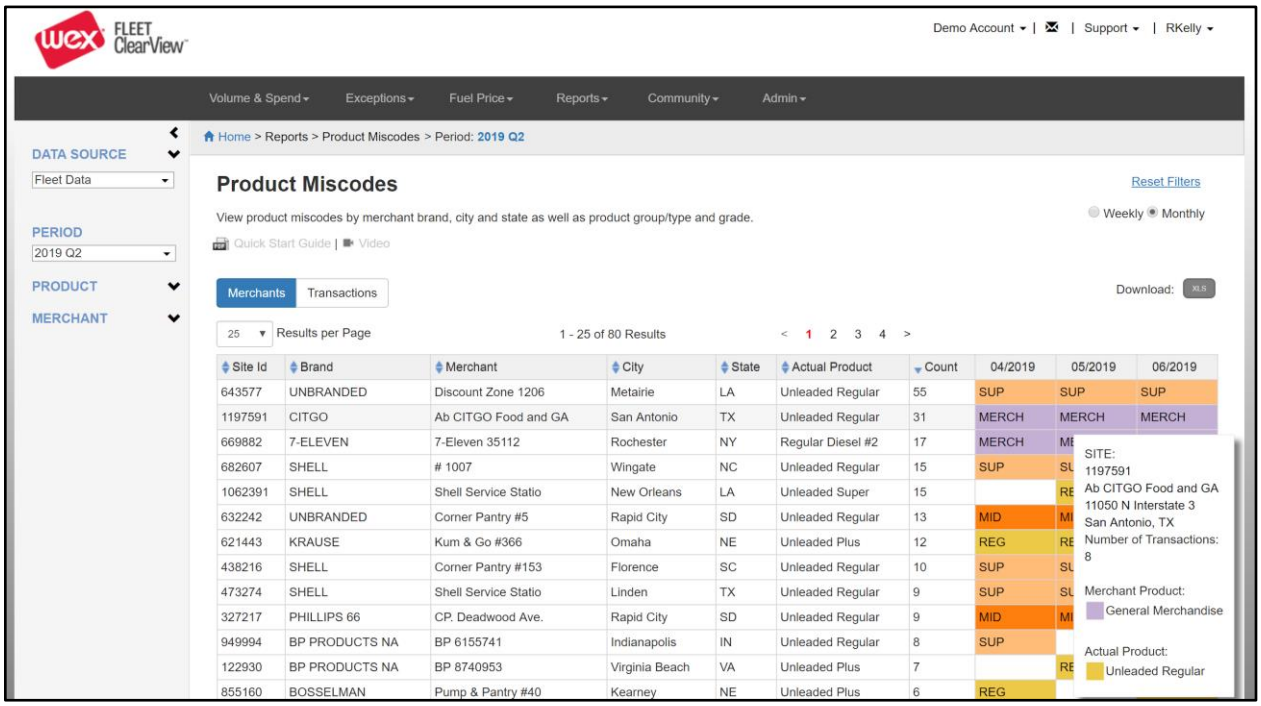
WEX offers the ClearView™ Essentials and ClearView™ Snap modules as part of our core product offering with extra no charge. Included in the ClearView™ Essentials module is a live product code cleansing algorithm fleets can utilize to proactively catch and see corrected product types.

Product Code Cleansing: The data scientists on the ClearView™ Team solved a long-standing, industry-wide issue by designing and developing a proprietary machine learning algorithm, which automatically detects and corrects inaccurate product codes transmitted by fuel merchants. The algorithm can make the following determinations with a 0.3% error rate:

- Categorize transactions by Product Group: fuel and non-fuel

- Categorize fuel transactions by Product Type: gasoline and diesel
- Categorize gasoline transactions by Product Grade: regular, mid-grade, premium

Corrected values are used in ClearView™ analysis, calculations, and exceptions reporting. Purchasing Entity can trust their product-related data displayed in ClearView™ and use it to make informed and confident decisions. This corrected information is aggregated in the Reports Module and displayed in ClearView™ transaction tables. ClearView™ displays both the type, grade and product level information provided by the merchant and the corrected values enabled by the algorithm. This information can be downloaded into Excel.



For information about how WEX handles disputed transactions, see 16.1.

3.20 Controls and Non-Vehicle Spending

The WEX Fleet card was developed to provide control and transparency. The card allows for fuel spending, non-vehicle spending at accepting locations within WEX's closed-loop network, and non-fuel vehicle spending -- along with the ability to discern between those various types of purchases -- to allow ONLY purchases that comply with an agency's policy or those that have been approved by a reviewer with permission to grant that level of approval.

One of the most significant advantages the WEX proprietary closed-loop card offers over an open-loop solution is our custom-built network that operates on product codes and not Merchant Category Codes (sometimes referred to as MCC codes). The WEX Fleet card can only be used at fuel and maintenance locations that accept the WEX card. This is the first line of defense against unauthorized or fraudulent spending, either of which could more easily occur with an open-loop credit card that can be used at any type of retailer.

WEX can ensure that all vendors accepting our cards comply with the same requirements and that data capture is tailored specifically to meet fleet customer needs.

WEX Fleet Cards and open-loop credit cards both offer fleet managers the ability to track and set controls on fuel spend. However, the WEX closed-loop solution provides more in-depth transaction data, greater flexibility and security, and tighter controls than open-loop credit cards.

Greater Access to Level III Data: All WEX-accepting merchants are required to be capable of transmitting Level III data, and that level of data is transmitted on 99.8% of transactions. When a driver swipes the card, the point-of-sale device prompts him or her to enter the Authorization Prompt ID and odometer reading. Level III line-item detail allows fleet managers to better track expenditures and facilitates cost analyses, vehicle life-cycle analyses, and overall fleet management.

For example, entering the correct odometer reading helps provide valuable vehicle information such as cost per mile, miles per gallon, vehicle operating costs, and intelligence for preventive maintenance schedules and vehicle replacements. It can also help streamline administrative operations, reducing the time and resources devoted to accounting.

Additionally, the WEX proprietary closed-loop network removes the need for fleets to have to perform site lockouts for merchants that do not transmit Level III Data on open-loop networks. Site lockouts can significantly reduce the number of accepting locations of an open-loop network card. This can be highly problematic for drivers utilizing open-loop solutions as they may pull up to a station that will decline their card due to merchant not being able to transmit Level III Data on an open loop solutions. This is not an issue for WEX's proprietary closed-loop network.

The WEX closed-loop proprietary network has an added advantage for government fleets eligible fuel tax exemptions. The IRS requires Level III Data to be included in that transaction data in order for a Credit Card Issuer to invoice a fleet net of the eligible taxes. These are typically Federal Excise Taxes for unleaded and diesel fuel and can have a significant impact to the bottom line for a fleet if they are not exempted up front by the fuel card provider. Transactions on an open-loop network where Level III Data is not present are not eligible for tax exemptions by the fuel card issuer.

Greater Security: The cardholder is required to enter an Authorization Prompt ID for each transaction. This helps prevent the card's use in case of loss or theft. Authorization Prompt IDs make fleet cards more secure and help limit internal and external fraud.

The Authorization Prompt ID can be linked to a specific purchase profile in WEXOnline®, providing further security by limiting expenditures to certain types of purchases, at specific dollar levels, and during specific timeframes.

Contrast this to a typical credit card, which usually requires no additional verification.

WEX customer have the ability to choose between Fuel Only cards and Custom Control cards.

Fuel Only cards permit the purchase of fuel -- such as gasoline, diesel, or alternative fuels -- based on the coding in the card's magnetic strip. Non-fuel purchases are not permitted when non-fuel items are identified at the time of authorization. It does not prevent items such as car washes paid for at the pump as merchant devices do not send this authorization request to us.

Custom Control cards permit all allowed types of purchases, based on the coding in the magnetic strip, at WEX accepting locations. This includes fuel, maintenance, and other items, such as general merchandise. Fleet managers have the option to apply Product Type Controls, allowing certain product categories to be allowed or blocked. For example, "General Merchandise" could

be deselected, allowing only Fuel and Parts/Service-related purchases. Custom Control Cards and Product Type Controls provide control over *what* drivers buy, not just *where* they buy it.

WEX accounts may be comprised of all Fuel Only cards, all Custom Control cards, or a mix of the two. This enables fleet managers to issue the appropriate card type based on a variety of purchasing needs.

Purchasing Controls: WEX developed its own closed-loop acceptance network among merchants and can control transactions at the merchant-type level. The WEX card is accepted at approximately 135,000 fuel and maintenance locations across the US.

Most generic credit cards can control the type of merchant. However, WEX goes a level deeper and is able to control the product type being purchased.

Product Type Controls: Product Type Controls are groupings of like products separated by type such as services, fuels, oil and fluids, food, etc. These controls enable or disable access to specific product categories, within WEX's closed-loop network of fuel and service merchants. WEX uses Level III data to allow customized card controls that allow use only at certain times and/or on specific product types.

Product Type Controls
Fuel (always on)
Parts & Service
Quick Lube
Oil & Fluids
Roadside Assistance
General Merchandise

Fleet managers can then set spending limits at the transaction level: dollar limits, fuel quantity limits, and timeframe of purchase.

Product Type Controls enable the fleet manager to limit transactions within WEX's pre-determined network of fuel and service vendors. For example, the fleet can allow drivers to purchase fluids, like washer fluid or oil, and disallow general merchandise, like snacks and soft drinks. A typical credit card would be open to all gas stations, and any merchandise that is available in this retail channel. For example, a driver could purchase electronics or snack food. This opens up the business to unauthorized expenses and program abuse.

Transaction Level Limits
Dollar Limits (Limit to specific daily and weekly amounts)
Fuel Quantity (Limit the amount of fuel purchased in a day)
Timeframe of Purchase (Limit to certain days, weeks, or hours of the day)

Purchase Controls: WEX Purchase Controls allow fleet managers to control the amount and frequency of purchases at the card level. Defining limits helps a fleet manager detect and prevent unauthorized transactions, potentially saving Purchasing Entity money by limiting unauthorized purchases. Fleet managers can use these tools to establish daily, weekly, twice monthly, or monthly limits for fuel and service expenditures. If a transaction is outside of the set limit, it is logged and recorded at the point of sale or, in the case of hard controls, declined at the point of sale.

Purchase Control Tools *	Level
Per transaction dollar limit	Card
Per period dollar limits (daily, weekly, twice monthly, monthly)	Card
Per period # of transactions (daily, weekly, twice monthly, monthly)	Card

Total Fuel per period (daily, weekly, twice monthly, monthly)	Card
Total Non-Fuel per period (daily, weekly, twice monthly, monthly)	Card
Total Gallons per period (daily, weekly, twice monthly, monthly)	Card
Time of day (subject to server location's time zone)	Card
Day of week (subject to server location's time zone)	Card

**Enforcement of some limits depends upon adoption of specification and merchant participation.*

3.21 Account Maintenance Services

The WEX system works off product codes that discern between what is being purchased. This includes maintenance services. If the WEX Product Type controls allow for maintenance services to be purchased in the card's assigned profile, then the corresponding product/service being purchased will be reported as any other transaction would. The controls in place are stated in 3.20 and maintenance services can be opted out of entirely as well should those types of purchase be not allowed. All of these controls can be accessed through the WEXOnline® module.

Additionally, WEX also offers a tool we call WEXPay™ to provide drivers a mechanism that enables out-of-network purchases at an additional 398,000 merchants in the MasterCard® network. Typically used for independent or geographically remote fuel and service sites, WEXPay™ utilizes a virtual card interface to provide the control of a fleet card with the convenience of a credit card. This out-of-network tool reduces the number of out-of-network sites where drivers would have to use an alternative form of payment.

Using WEX*Pay™* in conjunction with a Custom Control fleet card lets Purchasing Entity set the rules for their drivers. Custom Control cards allow Purchasing Entity to set merchant, transaction, and even product type limits. WEX applies those limits to both WEX Fleet Card and WEX*Pay*™ MasterCard transactions. Expanded coverage combined with integrated reporting and invoicing will further streamline Purchasing Entity's fleet purchasing and operations.

How It Works

As a MasterCard issuing bank, WEX uses Single-Use Account Number technology to authorize a one-time payment to a merchant. The account number provided to the merchant by phone is fast and secure — good only for that one purchase.

When the merchant calls for authorization, WEX applies Purchasing Entity's purchase controls and collect the same level of purchase detail, including Prompt ID and odometer. WEX integrates the purchase details into Purchasing Entity's WEX Fleet Card invoice and reports. One card, one invoice, one report with the same controls and service our customers expect from WEX.

As an additional option for fleets that operate a call center type operation for maintenance approvals, WEX offers Purchase Log to facilitate payments to merchants that accept MasterCard®.

Lastly, WEX does offer an ancillary product that is separate from our fuel card offering that and completely optional for use that we call Purchase Log. Purchase Log is a web-based interface that allows fleet-designated staff to securely log in to WEX's MasterCard® settlement website and enter pertinent Level III data associated with a transaction (or invoice). This can include up to six entry fields for the fleet-specific data such as billing codes. Once the transaction information and

payment amount is entered, a virtual card/single use ghost account with expiration dates and CVC2 values is presented. The fleet provides this to the merchant for payment. The Purchase Log product typically works well for fleets that operate a call center or central garage locations where an authorized fleet or service manager is working directly with service merchant locations who is servicing an asset of theirs. Purchase Log helps facilitate safe, secure, quick and easy payment. Additionally, it allows for maximum data capture to feed fleet management systems and removes the need for having to invoice on account, issue checks or other forms of payment.

Using the MasterCard® payment network, Purchasing Entity's see all requests and approve all transactions before they take place. Purchasing Entities can give their managers different levels of approval, while maintaining control over larger purchases.

Purchase Log uses Single Use Virtual Accounts to make secure payments to vendors. It is a safe and secure method of paying vendors that lowers the possibility of misuse or fraud, and significantly reduces paperwork.

Purchase Log transactions appear on their own invoice and report since the program is separate from WEX Fleet Card account. Reports can often be formatted to be imported into most customer accounting programs.

**Purchase Log purchases are subject to the MasterCard transaction processing rules and terms of use, including tax exemption rules and would be a separate account set-up.*

3.22 Level 3 Data

When a driver swipes the card, the point-of-sale device prompts him or her to enter the Authorization Prompt ID (required) and odometer reading. Level III data line-item detail allows fleet managers to better track expenditures and facilitates cost analyses, vehicle life-cycle analyses, and overall fleet management. The Authorization Prompt ID is flexible to allow for the input of driver ID information for cards assigned to vehicles or department or the input of asset/vehicle ID information for cards assigned to a person or department, yet this Prompt ID is required for authorization.

For example, entering the correct odometer reading helps provide valuable vehicle information such as cost per mile, miles per gallon, vehicle operating costs, and intelligence for preventive maintenance schedules and vehicle replacements. It can also help streamline administrative operations, reducing the time and resources devoted to accounting.

Requiring the cardholder to enter an Authorization Prompt ID, typically referred to as a Driver/Asset ID or PIN, for each transaction helps prevent the card's use in case of loss or theft. Authorization Prompt IDs make fleet cards more secure and help limit internal and external fraud.

The Authorization Prompt ID can be linked to a specific purchase profile in WEXOnline®, providing further security by limiting expenditures to certain types of purchases, at specific dollar levels, and during specific timeframes.

Contrast this to a typical credit card, which usually requires no additional verification. Additionally, if a merchant is not set-up to pass Level III Data on an open-loop network most times this additional prompting is non-existent.

WEX also offers flexible prompting at merchants who have adopted and coded to our most recent point of sale specification. This flexible or 3rd prompting allows fleets the option to ask for an additional field of data that is prompted at the pump. For example, this could be for a job number,

cost center, department code or any other piece of data a fleet may want to capture. This is an optional feature that can be opted in or out of.

3.23 If capable, System will provide accurate Merchant latitude and longitude. WEX complies with this requirement.

3.24 Participating States and Purchasing Entities have the need to capture their state's specific merchant diversity information (i.e. small business, minority owned, etc.) including Federal Diversity information.

WEX has all of the source data behind our merchant diversity information and standard reporting. Should a Participating State or Purchasing Entity have a need to capture information specific to their state, WEX can provide this information on a state-by-state basis by building and delivering a custom report based on the individual state's specifications.

3.25 Ability for Contractor to initiate/create one-time overrides after hours with follow-up notification to Program Administrator.

The WEX Customer Service Department is open 24 hours a day, 365 days a year (366 days in leap years), the WEX Customer Service Department are WEX Employees hired by WEX, US based, fleet-trained in-house through a WEX training program, located in several call centers across multiple states and time zones and are always available to handle the needs of the fleet by calling the toll-free number 800-492-0669.

WEX has a No Driver Stranded (NDS) policy and will work with States and Agencies to tailor that policy at the time of account set-up to ensure it complies with that given fleets needs and own policies. This policy will be put into the WEX account notes available to our customer service representatives for account so that representative can follow the stated policy to assist a driver in need, help safeguard against possible misuse and appropriately notify a fleet when an occurrence may happen. NDS policy can include scenarios such as:

- Emergency and/or Extenuating Situations
- Out of Network
- Specific Agencies: State Police/Patrol, DOT, etc.
- Exceeding Authorization Controls
- Lost/Stolen Card
- Terminated Card
- Card Suspended for Fraud
- Card Suspended
- Driver is unsure of Vehicle ID but it is active
- Driver is unsure of Vehicle ID and it is not active
- Vehicle ID is terminated

In addition to the WEX NDS policy, WEX also offers a virtual card option to facilitate out of network payments called WEXPay™. WEXPay™ can also be used to facilitate a No Driver Stranded program. WEX*Pay*™ is a tool that enables out-of-network purchases at an additional 398,000 merchants in the MasterCard® network by utilizing a virtual card interface. Typically used for independent or geographically remote fuel and service sites, WEX*Pay*™ provides the control of a fleet card with the convenience of a credit card. This out-of-network tool reduces the number of out-of-network sites where drivers would have to use an alternative form of payment.

Using WEX*Pay™* in conjunction with a Custom Control fleet card lets Purchasing Entity set the rules for drivers. Custom Control cards allows the ability to set merchant, transaction, and even product type limits. WEX applies those limits to both WEX Fleet Card and WEX*Pay*™ MasterCard transactions. Expanded coverage combined with integrated reporting and invoicing will further streamline Purchasing Entity's fleet purchasing and operations.

The merchant would call the number on the back of the WEX Fleet Card, and the merchant will be routed MasterCard for a virtual payment. Use of WEX*Pay*™ is subject to MasterCard terms & conditions and enrollment at the time of account set-up.

3.26 Roadside Assistance.

WEX Emergency Roadside is an existing WEX service delivered through partnership with National Automobile Club (NAC), one of the premier service motor clubs in the United States. Their mission since they were founded in 1924 has been to render Emergency Road Service promptly, courteously, safely and efficiently. WEX Emergency Roadside is available to all WEX Fleet Card users, and it's free until it is used. Users must "opt in" using settings in their online profile. Service is available for any class of vehicle, including Class 7 and 8 vehicles.

Services include winching, fluid delivery, lockout services, towing, tire change, jumpstart and more. Benefits include no out-of-pocket expense for drivers, 24/7/365 service with toll-free call or by placing a digital service request, preferred rates and ease of pay through the WEX Fleet Card, coverage across the United States, Canada and Puerto Rico, with service right from the driver's seat using available mobile app access. Drivers can also call WEX customer service connected to NAC or call NAC directly. All they will need is their WEX card.

NAC will advise the driver of the quoted response time and an estimated amount for the needed service from the vendor they identify who is able to assist with their breakdown need. These times can vary, depending on the type of service needs and other circumstances like weather or emergency events.

3.27 Many states require Fleet Card services in rural areas and marinas where separate/proprietary network are not always available.

WEX offers tool called WEX*Pay*™ to address out-of-network instances where a driver maybe in a rural area and the merchant is not set-up to accept our proprietary WEX Fleet card. WEX*Pay*™ is a tool that enables out-of-network purchases at an additional 398,000 merchants in the MasterCard® network by utilizing a virtual card interface. Typically used for independent or geographically remote fuel and service sites, WEX*Pay*™ provides the control of a fleet card with the convenience of a credit card. This out-of-network tool reduces the number of out-of-network sites where drivers would have to use an alternative form of payment.

Using WEX*Pay™* in conjunction with a Custom Control fleet card lets Purchasing Entity set the rules for drivers. Custom Control cards allow Purchasing Entity to set merchant, transaction, and even product type limits. We apply those limits to both WEX Fleet Card and WEX*Pay*™ MasterCard transactions. Expanded coverage combined with integrated reporting and invoicing will further streamline fleet purchasing and operations.

How It Works

As a MasterCard issuing bank, WEX uses Single-Use Account Number technology to authorize a one-time payment to a merchant. The account number provided to the merchant by phone is fast and secure — good only for that one purchase.

When the merchant calls for authorization, WEX applies Purchasing Entity purchase controls and collects the same level of purchase detail, including Prompt ID and odometer. WEX integrates the purchase details into Purchasing Entity's WEX Fleet Card invoice and reports. One card, one invoice, one report with the same controls and service our customers expect from WEX.

WEX is always increasing its acceptance coverage for fuel, marina and service locations. Because we currently have acceptance at more than 95% of all U.S. fuel sites, our merchant acquisition strategy is driven by the needs of our fleet customers that require service in remote areas or acceptance outside of domestic coverage.

If a customer needs specific merchants added to the WEX accepting network, we will request the following information from the fleet:

- Merchant name
- Merchant address
- Merchant contact person
- Phone and fax numbers
- Expected utilization/volume from Purchasing Entity's fleet
- Name and phone number of fleet employee requesting WEX card acceptance

WEX will work with all interested parties in an attempt to gain acceptance at the location. This includes either direct agreements or acceptance through our partnerships with network sales organizations and acquirers.

** Purchases are subject to the MasterCard transaction processing rules and terms of use, including tax*

3.28 Non-proprietary Network

When the merchant calls for authorization, WEX applies purchase controls and collects the same level of purchase detail and Level III Data including Prompt ID and odometer. WEX integrates the purchase details into Purchasing Entity's WEX Fleet Card invoice and reports alongside all other purchases made with Purchasing Entity's WEX Fleet Card. WEXPay™ transactions are denoted in reporting with MC to show they were processed using a MasterCard.

3.29 Primary vs. Non-proprietary Transactional Data

See response to 3.28.

3.30 Ability for a purchase to be executed via the standard (non-proprietary) network with Driver ID/PIN prompting.

When a driver is utilizing WEXPay™, the merchant will call into WEX customer service to receive a one-time use virtual card account number. When the merchant calls for authorization, WEX applies purchase controls and collects the same level of purchase detail, including Prompt ID and odometer from the driver that is verified by the WEX Customer Service Representative while the merchant is on the phone with them. WEX then integrates the purchase details into Purchasing Entity's WEX Fleet Card invoice and reports. One card, one invoice, one report with the same controls and service our customers expect from WEX.

3.31 Electric Vehicles

WEX has partnered with ChargePoint to provide Drivers and Fleet Managers/Program Administrators utilizing the WEX EV FleetCharge solution the ability to tie their WEX Fleet Card to an RFID tag or Mobile application. This integration allows fleets to obtain an EV charge at more than 66,000 ChargePoint locations.

The customer logs into the ChargePoint portal to connect the WEX card to the RFID card/fob provided by ChargePoint. The data needed to link a WEX account in the ChargePoint online system will be the WEX account number found on the card (13 digits), the WEX card number found on the card (5 digits) and the expiration date found on the card (MM/YY). WEX will facilitate all needed payments to ChargePoint and integrate the available data with all other available transaction data through WEX. All verification comes through ChargePoint and the associated data with transaction is reported through WEX as we receive it from ChargePoint.

WEX is also varying stages of talks with other charging providers to bring on additional acceptance. Future integrations will include mobile and other applications to allow for additional prompting and authorizations. Should there be particular vendors/charging providers States or Agency identify as wanting to have card acceptance with, WEX will work with those various providers to establish acceptance wherever possible.

3.32 Electric Vehicle Charging Stations

ChargePoint controls authorization for its charging stations. They send WEX a daily sales file containing all transactions made on a WEX Fleet Card and transactional data they have available for reporting. Transactions typically post to the customer's account within 48 hours. Customers will not see these transactions in the authorization details in WEXOnline for ChargePoint transactions, but all the details of the transaction available in the transaction detail (Excel/CSV) once the transaction has posted. The transaction will also show within the standard report set (PDF reports) WEX provides to fleet customers. Typical transactional data along with kilowatt hours and other available information is included in WEX reporting.

3.33 Parking Stations

Almost all parking station point of sale (POS) devices are not currently capable of passing along Level III data as part of a transaction. To solve for this POS hurdle, WEX is currently in the process of applying our mobile payment capabilities, via the WEX Fleet DriverDash mobile application. Using mobile technology is a way to overcome POS limitations and facilitate payments that also include the requisite data. Currently, WEX mobile payments are accepted at 25,000 US fueling locations, and WEX is in the process of talking to several national parking providers. WEX's plan is to bring acceptance for parking, with Level III data, to customers in the near future.

4. SYSTEM UPGRADES

4.1 Participating States/Purchasing Entities understand that as technology and regulations change, system changes will have to occur. Participating States/Purchasing Entities also assume that as a good partner, Contractor will actively and continuously improve the systems capabilities, functionality and usability including platform transition. Changes/upgrades will be made at no additional cost to the Participating States/Purchasing Entities.

When changes are made Contractor must, at a minimum, notify the Master Agreement Administrator (Lead State) and Statewide Program Administrator (Participating States), prior to changes being put in place. Master Agreement Administrator and Statewide Program Administrator must provide approval of any notification communication prior to distribution to Users.

4.2 Online Transaction Management

WEX engages with our customers in both the public and private sector on a regular basis to collaboratively create and improve WEX products and solutions. WEX product managers seek fleet input directly from customers through WEX's relationship management team for online input and improvements among many other WEX products and system. Products like WEX Fleet ClearView™ have grown directly from customer feedback and input.

WEX holds an annual Lead User Group conference. The Fleet Lead User Group is a broad group of fleet administrators and managers representing more than 50 organizations and government agencies nationwide. This group includes WEX's largest and most demanding fleets, and is focused on providing WEX direction on near-term products and services (typically 1-3 years out). In some cases, these fleets serve as WEX "beta testers" for new initiatives, and help identify important needs that might be unmet. The group conferences annually at WEX headquarters in Maine, and teleconferences regularly. Additionally, the group responds to "rapid-fire surveys" several times per year, answering questions regarding satisfaction with WEX products and services. This forum enables WEX to stay close to its largest fleet customers and maintain a clear understanding of the requirements necessary to keep products current and competitive.

As part of our Lead User Group, WEX also employs a Fleet Advisory Board. This is a targeted group made up of a cross-section of WEX's largest fleets. Its role is to represent the fleet industry with WEX senior leadership, and to provide key input, ideas and direction to advance WEX's leadership position in the marketplace. This group meets once or twice a year, and corresponds regularly via conference calls and email. Its focus is on strategic initiatives, looking out 3-5 years or more, to support WEX's continued growth efforts.

WEX will also employ frequent surveys to our largest customers. States' fleet and purchasing managers interact with our Strategic Relationship Managers (SRM) on a regular basis. Through these interactions and account review with SRMs, they will seek feedback or currently or desired products and online enhancement to bring back to WEX's product managers.

For users of WEX Fleet ClearView™, the Community Module allows Purchasing Entity to network, collaborate, participate in discussion groups on fleet-related topics (i.e. positively impacting driver behavior or reducing fraudulent spend), pose questions, and share best practice information with fellow analytics peers.

This module features Discussion Forums on a variety of fleet-related topics where users can collaborate and share information, a news feed of recent Community activity, the ClearView University and an Events calendar, and a Resources section where content can be downloaded.

The Summary Dashboard (default or home view) contains important announcements, a news feed of recent posts from WEX Fleet ClearView™ users, and a schedule of upcoming training and events.

The Discussion Forums view contains a list of available forums. Navigate to this view by using the top navigation menu.

The Calendar view contains a list of free events and training that is open to all WEX Fleet ClearView™ users. Navigate to this view by using the top navigation menu. There are four different ways to view the events: Month, Week, Day, and Event Stream.

The Resources view contains informational assets, such as, Quick Start Guides, white papers, articles, images, and release notes. Navigate to this view by using the top navigation menu.

4.3 System Upgrades/Changes Communication

WEX conducts routine, frequent and multichannel messaging to customers, from posting news in the WEXOnline® module's landing page, to sending emails, invoice inserts, mailers, and regular communications from the WEX Relationship Management Team in order to communicate system changes. Any major changes, either systematic or policy related, are communicated well in advance of any change being implemented and WEX typically seeks feedback from fleets to measure what, if any impacts they experience.

Online Outage Notification: Display on Home Screen

English example

Due to scheduled maintenance, online access will not be available from 11:00 pm ET Friday, November 16 to approximately 8:00 am ET, Sunday, November 18.

French example

En raison de l'entretien prévu du site Web, l'accès en ligne ne sera pas disponible à partir du vendredi 16

Novembre, de 23 h (heure de l'Est) et du dimanche 18 Novembre à 8 h (de l'Est)

4.4 Participating States/Purchasing Entities Top-Down Communication to the online transaction management system when changes are made

WEX does not engage in forced system changes without prior notice to the customer and collecting customer feedback as part of our assessment. WEX is proud of our long history of developing solutions and policies in close consultation and collaboration with our customers. We employ our Lead User Group, the advice of our Fleet Advisory Board and WEX Relationship Management Team to create and facilitate conversation and feedback around any potential changes with customers to make sure they are engaged and have a voice in any decisions that may occur. As an example, WEX was able to avoid implementing extreme policies that could have proved detrimental to our Fleet Customers with the large increase in White Plastic Fraud (card skimming) the industry has seen over the past several years. Through this collaborative process WEX was able to manage implementing manageable safeguards with our customers where possible and at the same time WEX implemented new technologies to more effectively identify and catch fraud early on after a card had been compromised.

4.5 System Changes Communication and Access to Data

Similar to our responses in requirements 4.3 and 4.4, WEX employs advanced notification for system changes. These notifications are posted in the WEXOnline® module prior to going into effect. Additionally, participating states in this agreement would each have the services of a Premium Fleet Services Account Manager and Strategic Relationship Manager assigned to their account. As such, outreach of this kind would occur at least one week prior, via phone call and/or email to the primary contact at each participating entity from this team to ensure proper notification is received and there is time for questions.

4.6 Training for System Changes

WEX provides multiple options and formats for training when system changes are made. Training can be customized as well to make sure they are relevant to at State or Agency's specific needs. The WEX Relationship Management Team will work with States and Agencies to ensure a training

model is put in place that works to cover their needs. Examples of what is available include but are not limited to:

- advice from the Premium Fleet Account Manager and/or the Strategic Relationship Manager;
- in-Person or video conference calls;
- recorded training sessions that can be saved and shared on State or Agencies local libraries or intranet sites;
- online self-help videos
- contextual Help within the WEXOnline® and ClearView™ modules;
- "What's New" indicators/information embedded where relevant in WEXOnline® with each release; and
- contextual help tutorials and walk-throughs to support right in line with what managers are attempting to do online in WEXOnline® and ClearView™.

4.7 Participating States will not accept forced/pushed 'top-down' process changes unless required by federal law. An example of a forced/pushed 'top-down' process change would be automatic shut off of cards on weekends, block purchases on specific days of the week.

WEX does not engage in forced system changes without prior notice to the customer and collecting customer feedback as part of our assessment. WEX is proud of our long history of developing solutions and policies in close consultation and collaboration with our customers. Although we can't foresee every scenario out there, WEX does not engage in forced process changes like the automatic shutoff of cards on the weekends, blocking of purchases on specific days or other drastic measures of this kind. We employ our Lead User Group, the advice of our Fleet Advisory Board and WEX Relationship Management Team to create and facilitate conversation and feedback around any potential changes with customers to make sure they are engaged and have a voice in any decisions that may occur. As an example, WEX was able to avoid implementing any policies that proved extremely detrimental to our Fleet Customers with the large increase in White Plastic Fraud (card skimming) the industry has seen over the past several years. Through this collaborative process WEX was able to manage this process with our customer while WEX implemented new technologies to more effectively identify and catch fraud early on after a card had been compromised.

5. REPORTING

Participating States and Purchasing Entities must have the ability to generate reports including detailed transaction data. A system with robust reporting capabilities is required.

5.1 System must time-stamp authorizations and reports according to the time zone of the authorization location or report request.

5.2 System must allow Program Administrator or Cardholder to run a transaction detail report which includes all User-inputted data.

5.3 System must allow for reports to be accessible as defined by roles and access levels.

5.4 System must have the ability for reports to be available in multiple formats (e.g. PDF, text, Excel, HTML, browser).

5.5 System must have the ability to provide program and transaction data reports at various frequencies to meet each Participating State/Purchasing Entity's requirements including but not limited to:

- Daily
- Weekly
- Monthly (billing cycle and calendar)
- Quarterly
- Annually (fiscal and calendar)

5.6 System must have the ability to extract/download data at any given time so that a report can be generated. The data can be downloaded by the following areas:

- Purchasing Entity Name
- Department/program Name
- Cardholder name (if applicable)
- Last 4 -6 digits of Credit Card number
- Merchant Name
- Merchant Spend
- Merchant transaction number
- Product Code
- Date transaction occurred
- Date transaction processed
- Charge Amount
- Transaction reference number
- City in which the transaction occurred
- State in which the transaction occurred
- Accounting string (Fund, Organization, Account, Program, Activity, etc.)

5.7 System must have the ability to provide "exception reports" including, but not limited to:

- Merchant Overrides
- Bank Overrides
- Program Administrator Overrides
- Back-to-back transactions
- Fuel type
- Over tank capacity
- Maintenance transactions
- Odometer input
- Decline report
- Miscellaneous transactions
- Split Transactions
- Duplicate Transactions

5.8 Contractor must provide quarterly rebate report no later than sixty (60) days after the end of the quarter to the Statewide Program Administrator or other representative designated by the Participating State. This report, at a minimum must include:

- Participating State
- Purchasing Entity legal name
- Purchasing Entity Type (Agency, City, etc. as defined by the Participating State)
- Gross spend for the rebate period

- Any credits for the rebate period
- Any write-offs for the rebate period
- Net spend for the rebate period
- Net spend for each rebate type
- Incentive Share/Rebate Rate per rebate type
- Rebate amount by rebate type
- Total rebate paid to the Purchasing Entity and/or Participating State.

5.9 Contractor must be able to provide a rebate report that reflects the type of rebate applied to each transaction no later than sixty (60) days after the end of the quarter. This report, at a minimum, must include:

- Purchasing Entity legal name,
- Entity Type (Agency, City, etc. as defined by the Participating State)
- Transaction date
- Merchant name
- Merchant TIN
- Transaction amount
- Applicable rebate type
- Applicable rebate BPS
- Rebate amount earned

5.10 Participating States and Purchasing Entities may have additional transaction data and rebate reporting requirements, detailed in each Participating Addendum.

5.11 Contractor must provide an annual report to the Lead State reflecting total spend and National Annual Volume Rebate earned by Participating States for the calendar year.

5.12 System must have the ability to schedule on-demand and Ad Hoc reports.

The WEXOnline® module offers a suite of reports, both standard and Ad Hoc, to help slash the administrative time involved with managing fleet expenses and operations. These reports can be scheduled for timely delivery to users or to a Fleet Manager/Program Administrator, they can be scheduled to run daily, weekly or monthly. The suite of standard and Ad Hoc reports allows users the flexibility to access system generated reports quickly, or build a report to the specifications important to them, their job responsibilities and/or reporting requirements. Additionally, through WEX's relationship management team can work with Purchasing Entity to build customized reporting for many different kinds of specialized or specific reporting needs a State or Agency may have. WEX requires all accepting merchants to be Level III capable, a level of transaction data capture that provides the foundation for our superior reporting tools.

The major report categories we offer are:

- Management Reports
- Profile Reports
- Transaction Reports
- Exception Reports
- Benchmark Reports
- Billing Cycle Reports
- Ad Hoc Reports
- Authorization Detail Reports
- Standard Reports

- Customizable Reports

In addition to these reports, contact Premium Fleet Services Account Manager, who has advanced query tools that satisfy complex reporting needs not covered by our standard reports, to order custom reports. WEX will be able to demonstrate this functionality in a Demo setting should the evaluation like to see what our WEXOnline® module is capable of.

5.13 Reports When Data is not available

Average turnaround times can vary depending on the type of data/report being requested and when the request is made of WEX. However, typical requests and responses usually take less than 24 business hours and are answered the same business day. The WEX Relationship Management team will work with Purchasing Entity on the initial request to ensure we are aware of any timelines, restraints or deadlines that the requesting State or Agency faces. Furthermore, whenever possible we communicate how long we anticipate a specific request to take. Some requests may require WEX to, for example, reach back out to a merchant for clarification or more information. This can add time, but is something WEX will work to communicate upfront with the requesting entity.

5.14 Standard or 'canned' reports available and who has authority to view them. Include description of search capabilities criteria and methods available.

The standard reports available in the WEXOnline® Reporting module are provided and described below. The authority to view various reports depends on the permissions assigned to a user within WEXOnline®. Search criteria and methods can vary based on the types of reports but they are typically searchable over a various levels in the hierarchy. Users can be limited to show only the levels of access they have within the hierarchy. Search criteria can include date ranges, report types, filter options, billing cycle, transaction date, posting date various other measures to populate the necessary data from the module.

Management Reports provide a view into the entire portfolio, illuminating trends and areas for possible savings. Available reports include:

Report Name	Description/Benefit	Mode of Delivery	Frequency
Major Fleet Activity Report	This report provides current and previous monthly summary information by account, by brand, outlining total spend, fueling spend, gallons, and average PPG. The report helps fleets identify which merchants they are using and whether they could save by switching to brands with a lower PPG.	WEXOnline	Monthly
Account Review	This report is a rolling 13-month review of data consisting of the following reports: portfolio summary, spend report, gallon report, fuel type usage snapshot, premium fuel gasoline spend, non-fuel spend snapshot, average price per gallon (gas and diesel), transaction report, activation report, brand report (gasoline, diesel and maintenance). This report allows fleets to identify areas of opportunity (such as excessive premium fuel use).	WEXOnline	Monthly
Opportunity Report	This report outlines savings opportunities by account, driver and/or vehicle by benchmarking purchases at a zip code level against the entire WEX portfolio. This report provides insight into where drivers are fueling, identifying ways to save by fueling at lower cost stations near their routes.	WEXOnline	Monthly

Profile Reports provide fleet managers and administrators with a snapshot of the information available in our system at the time the report is run, making it easy to manage the inventory of accounts, cards, drivers, and vehicles and helping ensure that the information and status of each item is up-to-date. Available reports include:

Report Name	Description/Benefit	Mode of Delivery	Frequency
Account Profile	This report itemizes the accounts within Purchasing Entity's hierarchy and provides details including contact name, shipping information, total cards, total driver prompts, card type, accounts, org units, and total vehicle prompts. This report helps fleet managers ensure their accounts are set up as desired.	WEXOnline	On Demand or Scheduled
Card Profile	This report provides a broad view of cards across multiple accounts or focused on a single account. This allows fleets to monitor and review card data based on a comprehensive view of card attributes or just a few specific card details.	WEXOnline	On Demand or Scheduled
Vehicle Profile	This report provides a broad view of vehicles and assets across multiple accounts or focused on a single account. This allows fleets to monitor and review vehicle data based on comprehensive information, including account assignment, name, status, and date of last transaction.	WEXOnline	On Demand or Scheduled
Driver Profile	This report provides a broad view of drivers across multiple accounts or focused on a single account. This allows fleets to monitor and review driver data based on comprehensive information, including account assignment, name, status, and date of last transaction.	WEXOnline	On Demand or Scheduled

Transaction Reports provide fleet managers and administrators with a full range of authorization and posted transaction data to perform audits, trend analysis and data mining. This allows for simple ad hoc queries and more in-depth, customizable reporting to help drill down to the data needed. Available reports include:

Report Name	Description/Benefit	Mode of Delivery	Frequency
Ad Hoc Transaction Details	This report is a simple, on-demand, ad hoc reporting tool that provides posted transaction details for a period of time specified (up to 24 months). This tool is especially useful in viewing transactions associated with a particular billing cycle, or a quick way to look up something being investigated. It has both filtering and sorting capabilities.	WEXOnline	On Demand
Ad Hoc Transaction Summary	This report is a simple, on-demand, ad hoc reporting tool that provides posted transaction details at a summary level for a period of time specified (up to 24 months). This tool is especially useful in viewing a summary of information by account, card, or brand, with an ability to then drill down into transaction details to get more information.	WEXOnline	On Demand
Transaction Management	This report is a comprehensive, highly customizable, transaction-level report that allows the ability to analyze usage at certain merchants or	WEXOnline	On Demand or Scheduled

	within specified dollar amounts or within selected accounts. It allows for a broad set of filters, and the ability to select and sort the fields.		
Authorization Activity	This report provides a direct view of authorization activity, which is posted in real-time in our system. This detailed authorization data helps make informed decisions and perform analysis to help manage and enforce driver purchasing policies. It is also an excellent tool for assisting drivers on the road who may have encountered a "decline" at the fuel pump, but are unsure why.	WEXOnline	On Demand or Scheduled

Managing by exception is an excellent way to save time while ensuring Purchasing Entity policies are being followed in the field. **Exception Reports**, when paired with card controls, help manage program by identifying potential fraud or abuse. Available reports include:

Report Name	Description/Benefit	Mode of Delivery	Frequency
Ad Hoc Exceptions	This report is a simple, on-demand, ad hoc exception reporting tool that provides the ability to view posted transaction details for a variety of exceptions. Some of the options include: high octane fuel, weekend purchases, and number of gallons or number of transactions per period. The tool has both filtering and sorting capabilities.	WEXOnline	On Demand
Flexible Exceptions	This report provides a comprehensive set of exception parameters for posted transactions upon which Purchasing Entity can be alerted. Any transactions that meet the threshold set will be captured on a report for review. Additionally, Purchasing Entity can choose to receive an email once a day notifying of any exception that has occurred. This tool is effective in identifying possible fraud or abuse of cards.	Email and WEXOnline	Daily capture of transaction details; on demand report viewing
Real Time Alerts	This tool allows Purchasing Entity to set parameters within Authorization Profiles so Purchasing Entity can be immediately alerted when a transaction falls outside of that parameter. An email will be deployed to notify of what has occurred, in near real-time, and it will also be available for review in an online report. This tool is very effective in identifying possible fraud or abuse as the transaction is occurring.	Email and WEXOnline	Emailed as threshold is exceeded; on demand report viewing

Benchmarking Reports provide a way for fleets to understand how their purchasing behavior compares to others, with insight into the types of merchants being used.

Report Name	Description/Benefit	Mode of Delivery	Frequency
Minority and Women-Owned Business Report	This report provides monthly roll-up of transactions, gallons, and dollars spent at minority- and women-owned fueling and service sites. This report is useful for those fleets that are tracking their minority spend and have a program to increase spending at minority- and women-owned businesses.	WEXOnline	Monthly
WEXIndex™	WEXIndex™ is an index and report published by WEX for the price per gallon of certain fuel types in a given month. Our customers use this report to understand pricing trends in the industry. Within the Account Review (see above under Management Reports), it is used to benchmark Purchasing Entity's fleet pricing behavior vs. the national	WEXOnline	On Demand

	average for the specific fuel type. This tool is an excellent way to help drivers make good choices on where they fuel and where fueling costs can be reduced.		

Billing Cycle Reports accompany an invoice to assist fleets in reconciliation before making payment. They are available in a variety of formats, giving the fleet the ability to choose the format that is most beneficial. Available reports include:

Report Name	Description/Benefit	Mode of Delivery	Frequency
Purchase Activity Report	This is our standard billing cycle report that accompanies each invoice, with a roll-up by card or department. It can be retrieved online and is in a PDF format. It consists of several key elements: • Purchase Activity: by card transaction details for that cycle • Financial Summary: financial roll-up of spend by account, fuel and non-fuel • Site Summary: roll-up of purchase behavior by brand, with totals • Tax Exempt Summary (tax exempt fleets only): roll-up of exempted and reported transactions by jurisdiction and fuel type	WEXOnline	With invoice, at cycle close
View Details	This is our standard transaction detail report that is available online and accompanies each invoice. The report can be downloaded into Excel or CSV as needed and provides an easy way for fleets to reconcile their transactions with their invoice. Also provides the ability to download for additional filtering or archiving.	WEXOnline	With invoice, at cycle close
WEXLink	WEXLink is a comprehensive data file available to fleets that wish to import transaction details into their systems. It can serve as simply a report, or as a billing and reporting file. (See description below in requirement 6.6)	WEXOnline, FTP, or Email	With invoice, at cycle close

5.15 System must capture and report sales by Product Code (PC). If PC Type reporting is available, please explain how this reporting would be conducted and what information would be provided.

WEX does capture and report sales by Product Code (PC). PC type reporting is available through WEX, is accessible in multiple places and formats. WEX's reporting tools in WEXOnline®, ClearView™ and in WEXLink™ files all contain Transaction Data that is inclusive of the product codes as reported to WEX by the merchant. WEX utilizes product coding standards set by the National Association of Convenience Stores (NACS).

WEXOnline® contains multiple reports that are available either via standard reporting or custom reporting that includes PC information. WEXOnline® Exception Reporting can also be set-up to trigger against unwanted or closely watch product grouping to alert a Fleet Manager/Program Administrator when an unwanted purchase may have occurred.

WEX Fleet ClearView™ Essentials module allows user with access and the appropriate permissioning to search and reports on Product Codes easily and quickly with in the dynamic analytics platform. PCs can be easily searched by Product Group, Product Type, Product Grade and Product Name.

Most of our larger fleets choose to receive billing and transaction data in the form of WEXLink™ file. This is an electronic file that provides customers with transaction data on a daily, weekly, or monthly basis via the internet (i.e. SFTP). The data is provided in a flat file and includes extensive detail for both fueling and service transactions, enabling fleets to analyze vehicle, driver and purchase information, and to reconcile monthly invoices. WEXLink™ files are designed specifically for fleet customers who want to perform detailed analysis and reporting on their fleet accounts within their own systems. This file can be merged with existing information management system, making it easy to track costs. Product Code information is available as Transaction Data report.

See table in Answer 6.6 for a summary of available reports, including Product Code reporting.

5.16 Contractor must be able to provide comparative rebate reporting comparing the previous quarterly and annual rebates to the then current quarter/year.

WEX's system allows for robust account structures and reporting functionality, including the reporting of rebate earnings that provides a full breakdown of a rebate for a given time period. These reports can be structured to compare the previous quarterly and annual rebates to the current quarter/year. Purchasing Entity's WEX Premium Fleet Services Account Manager along with the dedicated Strategic Relationship manager will work at the time of implementation, or at any point during the life of the contract, to set up or modify reporting to ensure it satisfies the needs on an individual State or Agency.

5.17 If capable, system must provide sales by merchant type (i.e. small business, minority owned, etc.) including Federal Diversity information.

WEX's Minority and Women-Owned Business Report provides monthly roll-up of transactions, gallons, and dollars spent at minority- and women-owned fueling and service sites. This report is useful for those fleets that are tracking their minority spend and have a program to increase spending at minority- and women-owned businesses. This report is delivered via WEXOnline®.

In addition to WEX's Minority and Women-Owned Business Report Purchase Activity Report, delivered via WEXOnline® at the close of every billing cycle, is our standard billing cycle report that accompanies each invoice, with a roll-up by card or department. It can be retrieved online and is in PDF format. It consists of several key elements:

- Purchase Activity: by card transaction details for that cycle
- Financial Summary: financial roll-up of spend by account, fuel and non-fuel
- Site Summary: roll-up of purchase behavior by brand, with totals
- Tax Exempt Summary (tax exempt fleets only): roll-up of exempted and reported transactions by jurisdiction and fuel type

6. DATA TRANSFER/INTEROPERABILITY

6.1 System must be accessible in accordance with Section 508 (Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220), August 7, 1998) - accessibility.

6.2 System must be supported (at a minimum) by Internet Explorer, Edge, Firefox, Safari, Chrome.

6.3 System must allow for downloads, data transmissions, and integration in support of non-standard/standalone financial management systems, including legacy systems.

6.4 System must have the ability to interface with legacy fleet management systems at no charge to customers including, but not limited to:

- Asset Works (Maximus, M4 and M5)
- Faster
- VMTS
- SAP

6.5 System must be able to provide Fleet Card information and transaction detail in a format compatible with all Enterprise Resource Planning (ERP) or e-procurement systems utilized by any Participating State/Purchasing Entity that is part of this Master Agreement. Those systems include, but are not limited to any SAP, Banner, Oracle, Periscope, or PeopleSoft systems.

WEX can deliver data in a flat file format, or WEX*Link*™ file, as well as downloadable formats out of our WEXOnline® module in CSV and XLS formats. These file types make it easy to import data into any back-office system -- including, but not limited to, SAP, Banner, Oracle, Periscope and PeopleSoft -- for thorough reporting and analysis. Additionally, WEX can perform custom file work to help meet a State or Agency need.

6.6 Contractor shall be able to provide, at no cost, the entire transaction data collected by the merchant at the frequency requested by the Participating State or Purchasing Entity in accordance with standard File Transfer Protocol (FTP). At a minimum, file outputs must include CSV (comma delimited) format and XLS.

Most of our larger fleets choose to receive billing data in the form of WEX*Link*™, an electronic file that provides customers with transaction data on a daily, weekly, or monthly basis via the internet (i.e. FTP). The data is provided in a flat file and includes all available information made available by the merchant with extensive detail for both fueling and service transactions, enabling fleets to analyze vehicle, driver and purchase information, and to reconcile monthly invoices. WEX*Link*™ files are designed specifically for fleet customers who want to perform detailed analysis and reporting on their fleet accounts. This file can be merged with existing information management system, making it easy to track costs. File outputs include CSV (comma delimited) format and XLS. The file can be set-up for delivery on a frequency suitable for the participating State and/or Agency.

Some of the detailed transaction information included in the WEX*Link*™ billing file is:

WEX*Link* File Data Summary			
Transaction Data	***Site Data***	***Vehicle Data***	***Driver Data***
Product code	Site name	Vehicle number/ID	Driver ID
Product name	Brand name	Vehicle plate number	First name
Transaction date	Site address	License plate state	Last name
Transaction time	Site city	Odometer	
Transaction number	Site state		
Fuel type	Site zip code		

Unit of measure	Private site quantity		
Unit cost	Private site transaction		
Quantity purchased			
Gross dollars			
Exempted tax			
Reported tax			
Invoice number			
Billing period			
Account number			
Code tracking*			
Non-fuel purchases			

6.7 System must have the ability to create custom extract files/mappers at no charge to the customer for automatic feed into their financial systems (i.e. SAP, Oracle, SMFA, SQL, PeopleSoft, Excel, etc.). This custom file will be created in such a manner that it can be imported into the Purchasing Entity's financial system with no interaction, special programming, or manual entry of transaction data.

WEX, at no charge to the Purchasing Entity, is able to create custom files that are capable of being imported into financial systems. The WEX IT Team can build custom files that are delivered via SFTP, email or mailed to a customer. The file types we can build and support are fixed length, CSV, Excel and PDF files. The files will be built to specs provided by the customer to match what they need the file to look like to minimize coding on their side to load the files. The files can be delivered on a variety of frequencies from daily, weekly, monthly (on any day of the month) and billing cycle. This work does have to go through a slotting and prioritization process. Customers should make requests through the Relationship Management Team. The Purchasing Entity/Customer will need to clearly detail what it is they are looking for and how they need to receive the customize file. The Contractor will build the file and work through a testing process with the Purchasing Entity to ensure the file work prior to them being put into production. Changes to a file would follow a similar process.

The WEXOnline®system also offers customization of data for reporting and export. The specification would be based on the standard data fields provided by WEX. These reports can be scheduled for export to CSV or Excel format and can be emailed to individuals or multiple people. Depending upon account set-up, they can also be sent to a WEX SFTP for retrieval.

7. SECURITY & CONFIDENTIALITY

7.1 System must be PCI DSS compliant throughout the term of the Master Agreement.

7.2 System Electronic Data Interchange (EDI) standards must be compliant with ANSI ASC.

7.3 Contractor must keep Participating State, Purchasing Entity, and Cardholder information confidential and may not share, use, or sell data acquired through the execution of this Master Agreement or affiliated Participating Addendum.

7.4 Cyber Security Protocols.

WEX's Information Security Organization is responsible for safeguarding the confidentiality, integrity and availability of physical and electronic information assets. The overall objectives for information security at WEX include:

- Ensuring the confidentiality, integrity and availability of WEX's information assets.
- Managing controls to safeguard WEX's information assets against unauthorized use, access or disclosure.
- Maintaining business resiliency in the event of a disaster or security incident.
- Managing a control environment consistent with commonly accepted industry standards and frameworks including ISO 27001, PCI-DSS, SOX/404, and NIST.
- Managing risks related to the use of external service providers and related third parties.

WEX's Information Security organization has adopted the ISO 27001/27002 framework for protecting information assets. The framework and related control activities have been established using a risk based approach aligned to enable the business and support strategic priorities.

As such, the Information Security framework includes the following:

ISO 27001 Domain	Representative WEX IS Capabilities
Information security policies	Corporate IS Policy, Acceptable Use, and extensive IS standards and procedures
Organization of information security	VP CISO reporting to the audit committee with functional groups including access management, threat management, risk management, business resiliency and architecture and engineering.
Human resource security	Background checks, training, management oversight
Asset management	Asset inventories maintained, data classification, and media handling controls
Access control	Provisioning and recertification controls limit access based on need to know and enforce stringent password and segregation of duties requirements

Cryptography	Encryption of relevant data in transit and at rest based on data classification
Physical and environmental security	Physical access and environmental controls
Operations security	Procedures, anti-virus, backups, change management, capacity management, logging, vulnerability management
Communications security	Network controls, network segmentation
System acquisition, development and maintenance	System development methodologies, secure coding training, security engagement into the project management lifecycle
Supplier relationships	Review of key third party service organizations to include right to audit and review of SSAE16, PCI and related reports
Information security incident management	Incident management, security investigations, and eDiscovery capabilities
Information security aspects of business continuity management	Formal business continuity and disaster recovery programs including periodic testing and business resiliency controls
Compliance; with internal requirements - policies, and with external requirements - laws	PCI-DSS, SSAE16, SOX/404, NIST, Data Protection Laws, data loss prevention controls

In terms of administration and governance, WEX has established a Global Chief Information Security Officer who reports to the Board of Directors Technology Committee and administratively through the Chief Technology Officer. WEX's security function includes Governance, Risk and Compliance, Identity and Access Management, Security Architecture, Security Engineering, and Business Continuity/Disaster Recovery functions. The Security framework is reviewed regularly and updated at least annually to respond to the rapidly evolving threat landscape.

WEX has also contracted with a Managed Security Service provider to perform 24x7 real time threat intelligence, security monitoring, and incident response capabilities.

7.5 Data Breached Notification.

The WEX Crisis Management Team ensures notification requirements are assessed by the legal and compliance teams and facilitates all required notifications via the appropriate channels to those who may have been impacted by any data breach.

7.6 Data Breach and Protocols to protect Agency Information.

In the event of a data breach the WEX Crisis Management Team engages immediately to implement the WEX Business Continuity Plan (BCP) to triage the level a potential breach and immediately safeguard all customer, State and/or Purchasing Entity's information. WEX has a BCP for each line of business across our organization, and this plan is customized to meet the unique needs of WEX customers across our organization in a given line of business. The WEX Business

Continuity Plan ensures that WEX employees, and the physical and information assets entrusted to us by our clients are protected by viable response and recovery plans. The Corporate BCP takes an all hazards approach to the assessment of risk posed to critical business functions and develops comprehensive plans that provide for effective recovery from a disruption of critical business functions. The plans are tested before implementation and exercised regularly thereafter to ensure their viability and continued improvement.

In instances of fraud or card skimming, WEX works in a similar manner to ensure accounts and customer information is shut off and safeguarded. See discussion of WEX's fraud detection system, SaferPayments, in our response to Question 15.4.

7.7 Contractor must provide and maintain an appropriate information security program to prevent the unauthorized disclosure, misuse, alteration, or destruction of confidential information.

As part of the WEX BCP, WEX has in place an information security program that exists to safeguard both WEX and WEX customers from the unauthorized disclosure of information, especially sensitive information. This includes unauthorized disclosure, misuse, alteration or destruction of confidential information. The WEX Information Security Program outlined below covers the protection of cards, account numbers, passwords, PINs, transaction data, among many other sensitive systems and information.

The WEX production data center is a secure facility, accessed by badge readers and monitored by CCTV. The facility is staffed 24x7x365. The WEX data center has a Tier III rating as specified by the uptime institute. WEX visitors and maintenance personnel are only allowed access to data center facilities with an authorized escort and approved business need.

WEX has an ISO 27001/27002 based Information Security Program that includes robust access controls, security monitoring controls, governance, risk and compliance, backup and recovery capabilities, regular penetration testing and vulnerability scanning, strong physical and environmental controls, policies and procedures, and security awareness training. Policies and standards are reviewed and updated annually. Procedures are owned by the individual teams and are required to meet the standards and also be approved by their management.

WEX also obtains a SSAE16 SOC1, PCI-DSS certification over our WEXOnline® platform, and is subjected to regular reviews and oversight by Internal Audit, External Audit, FDIC Examiners, and various third parties.

The SSAE16 SOC1, PCI-DSS certification governs WEX security protocols for how we handle customer information like cards, account numbers, passwords, personal identification numbers and transaction data.

Vendor Access

WEX has a Vendor program that establishes the following review and oversight areas: Information Security service provider review, Procurement review, and Legal Department review that must be performed prior to a third party being approved. Logical access is then requested by the WEX manager that owns the relationship with the third party and provisioned by a systems access group.

System Patches

System patches, including service packs and security fixes are reviewed and approved following standard change management processes. Relevant patches are applied as soon as practical given

maintenance windows, risks, etc. Not all updates are relevant in every environment, so each is evaluated for relevance and risk before implementation.

Protection From Attacks

The OWASP standards are built into development processes and manual testing is performed in addition to peer review as required by our SDLC. WEX uses an automated dynamic application security testing (DAST) solution that scans web applications to find vulnerabilities and provide guidance on remediation.

WEX receives vulnerability announcements, for relevant systems, from vendors, third parties, NIST, FDIC, FBI, and other threat feeds and has a dedicated security operations team managing and maintaining the vulnerability management program. The Vulnerability management procedure requires a ticket to be generated and assigned to Information Technology operations teams for patching.

Logging and Log Monitoring

Logs are aggregated and correlated using an on premise, commercially available, SIEM platform. Logs are kept for one year. Additionally, WEX has managed services contracts with a well known global service to assist in monitoring and responding to log events.

Remote Access

Remote access to WEX networks from a non-trusted network requires an authorized device, the use of VPN and two-factor authentication.

Network based intrusion detection is used at critical points of the network infrastructure. Network access control has been implemented to ensure only authorized devices that have the correct security posture are admitted onto the network.

Media Destruction

WEX utilizes a third-party vendor for media destruction. WEX also has onsite degauss capability that meets Department Of Defense requirements for media sanitization.

Access

Access is granted through the provisioning of a unique user ID, with least privilege rights granted. Requests are approved by a user's manager, and provisioned by a systems access group. Initial logon requires a password change, and access is disabled upon termination. Key password parameters: Min. Length of 8 characters must choose 3 out of the 4 of the following: capital letter, lower case letter, number, special character.

Lock out is three unsuccessful attempts and expiration is 90 days. User authentication can be performed, depending on the application, by: Active Directory, LDAPS, or Oracle access manager.

Encryption Policies and Standards

WEX encryption policies and standards govern encryption for data in transit and/or at rest. Standard algorithms are AES 256 and 3DES. WEX SAN data is encrypted at rest using AES256 and mobile devices utilize whole disk encryption. For web applications, SSL is used between web servers and the browser. Console access is SSH.

Incident Response

WEX has an incident response policy, standard, and procedure that is reviewed, approved, and tested yearly. Procedures contain: incident handling, incident detection and analysis, incident categorization, incident analysis, incident documentation, incident prioritization, incident notification, containment, eradication, and recovery, evidence gathering and handling, identifying the attackers, eradication and recovery, and post-incident activity using collected incident data.

Subcontractors

The WEX Legal Department, in conjunction with Procurement, performs contract review for service providers and has standard legal language in all contracts that address our security requirements and expectations of subcontractors.

7.8 Securing and preventing unauthorized disclosure, misuse, alteration, or destruction of confidential information.

WEX employees multiple levels of security with our contractors depending on the level of access they require. WEX prevents unauthorized disclosure, misuse, alteration or destruction of confidential information by utilizing the security protocols and proprietary technological advantages described above for both WEX and our Contractors. See responses in 7.1, 7.5, 7.6, 7.7 and 15.4 for more detail.

7.9 Disaster recovery plan (i.e. data breaches, system errors and resolution plans, timeframe for data restoration, backup in case of power failure, etc.).

WEX's Organizational Resilience Program Overview was created to provide clients with information identifying and defining the resiliency roles and responsibilities of WEX and our clients in the event operations are impacted due to disruption or disaster. WEX employs multiple call center locations across the country to ensure a given event in one area or region will not render another in operable. The same goes for WEX's authorizer that validates and approves transactions. Both are on separate power grids and housed in multiple locations across the country. In addition to some of these basic precautions, see our business continuity plan:

Overview

The WEX Business Continuity Plan includes well–defined and documented procedures, designed to respond to unforeseen events. WEX utilizes a step-by-step, standardized incident management process that ensures all requirements relating to proper response, escalation, notification and resolution of a disruption of any type are met. The WEX BCP utilizes the ISO 22301 framework and is integrated with WEX physical and information security, and risk management systems. The WEX BCP adopts a process approach for establishing, implementing, operating, monitoring, reviewing, maintaining, and improving the organization's organizational resilience management system.

Review Policy

Oversight of business continuity planning is assigned to the Director, Organizational Resilience who ensures that plan updates are completed and that the plan is tested and remains current and relevant.

Objective

The objective of the WEX BCP is to provide a comprehensive and systematic process of prevention, mitigation, preparedness, response, continuity, and recovery that provides an on-going, dynamic, and interactive process that serves to assure the continuation of the organization's critical business functions before, during, and after a disruptive event.

The BCP allows WEX to: effectively manage disruptions; provide efficient notification to personnel, clients, business partners, service providers and vendors; ensure organizational stability; provide well-defined and documented incident management procedures to minimize decision making during a disaster; ensure regulatory and legal compliance; and ensure regular testing of response/recovery plans.

Recovery

Summary

The WEX BCP provides well defined and documented procedures which provide the incident management team with the ability to effectively and efficiently manage the recovery process during and after a disruption of service to our clients. By implementing the pre-planned procedures, our incident management team can work together in an expedient and effective manner to resolve any unforeseen incident and ensure that the impact to our clients is minimized.

Alternate Processing Sites

WEX utilizes a combination of cloud and physical infrastructure to ensure resilience and recoverability of production systems across the globe. Each primary production system is designed to be highly available and resilient by utilizing HA architecture within each data center or by duplicating systems across multiple cloud availability zones as well as a corresponding disaster recovery solution to ensure recoverability of production systems.

The WEX call center will staff the alternate processing sites with operational support staff, technical, telecommunications, and administrative support personnel. WEX will maintain a fully functional Emergency Command Center at each location to provide redundancy for incident command.

Plan ORGANIZATION

Overview

The WEX BCP consists of multiple plans that outline physical security, emergency response, and recovery responsibilities, tasks, and procedures to be used throughout recovery efforts for our business locations and data centers.

WEX utilizes multiple industry recognized automated resiliency tools and services to ensure global situational awareness, effective preparation, communication and collaboration across the enterprise related to resiliency planning, testing and incident management.

Business Unit Plans

The business unit plans contain the recovery tasks and the action items required to recover the functions of each critical business unit.

Technology Plans

The technology plans identify the responsibilities, recovery tasks, detailed logistics and action items vital to recovering the critical applications and network infrastructure that supports our business units.

Emergency Response Plans

The emergency response plans identify the responsibilities and action items required for initial response to incidents and focus on preservation of life and safety of WEX employees and clients, as well as, the safeguarding of physical and information assets.

Corporate Incident Management System (IMS)

By allocating resources and providing a standardized incident management structure for all affected locations, the IMS identifies the Emergency Operations Center (EOC) responsibilities and activities that will assist the crisis management and recovery teams throughout the recovery effort. The responsibilities and tasks contained in the IMS are performed at the designated EOC.

Crisis Communications Plan (CCP)

The crisis communications plan provides procedures for the management and coordination of communications within WEX and externally to WEX clients and external stakeholders.

Pandemic Plan

The WEX Pandemic Plan lays out the strategic approach and preparations for influenza or other infectious disease pandemic. The plan is designed to minimize the risk to the health and safety of WEX employees and customers and ensure the continuity of business operations.

The plan includes recommendations from the Centers for Disease Control (CDC) and includes tactics for addressing workforce and facility impairment, notification of employees, and clients in the event of plan activation.

Support Plans

The support plans identify the responsibilities and recovery tasks required to provide emergency travel, financial, human resource, damage assessment, and salvage activities.

Evaluation AND TESTING

Summary

WEX will evaluate organizational resilience plans, procedures and capabilities through periodic assessments, testing, After Action Reports (AAR), performance evaluations and exercises.

Monitoring and Measurement

WEX will establish, implement and maintain performance metrics and procedures to monitor and measure, on a regular basis, characteristics of its operations that have a material impact on its performance, including partnership and supply chain relationships. The procedure shall include documenting of information to monitor performance, applicable operational controls, and conformity with the organization's organizational resilience objectives.

Evaluation of Compliance

Consistent with its commitment to compliance, WEX is continuously evaluating compliance with applicable legal and regulatory requirements. WEX will evaluate compliance with other requirements to which it subscribes including industry best practices.

Exercises

WEX will validate its Business Continuity Plans using testing and exercises that:

- Are consistent with the scope of the BCP and the objectives of the organization
- Are based on scenarios that are well planned with clearly defined objectives
- Minimize the risk of disruption to operations and assets
- Produce a formalized post exercise report that contains outcomes, recommendations, and plans to implement improvements in a timely fashion
- Are reviewed within the context of promoting continual improvement and are conducted at planned intervals, from time to time on a non-periodic basis, and when significant changes occur within the organization and the environment it operates in.

7.10 Roles and responsibilities of the team responsible for monitoring and managing system and product risks. Include how known risks and mitigation plans would be communicated to Participating States, Purchasing Entities, and Cardholders.

Consistent with its commitment to compliance, WEX is continuously evaluating compliance with applicable legal and regulatory requirements. WEX employs an Organizational Resilience Team to manage, monitor, and evaluate WEX's systems. The team works to assess risk across the entire WEX organization and employ policy and plans to ensure all risk is mitigated to the lowest level possible as well have to have communication and response plans in place should something happen. WEX evaluates compliance with other requirements to which it subscribes, including industry best practices. WEX has established performance metrics and procedures to monitor and measure, on a regular basis, those characteristics of its operations that have a material impact on its performance, including partnership and supply chain relationships. The procedure shall include documenting of information to monitor performance, applicable operational controls, and conformity with the organization's organizational resilience objectives.

8. CUSTOMER SERVICE

Customer service and support are key to the successful operation of any card program.

8.1 Contractor must provide at least one (1) designated Relationship Manager assigned to each Participating State. Relationship Manager may provide service to multiple states as long as service level meets each of the Participating State's requirements.

8.2 Relationship Manager must be familiar with all aspects of Category 2 – Fleet Card Services of the Commercial Card Solutions Master Agreement and applicable Participating Addendum.

8.3 Relationship Manager must be available to Program Administrators and Master Agreement Administrator Monday through Friday during the Participating State's regular business hours.

8.4 Relationship Manager will provide managing account support to Program Administrators and contract support to Master Agreement Administrator in each state.

8.5 Contractor must provide at least one (1) designated Account Coordinator assigned to each Participating State to support all Purchasing Entities within that state. Account Coordinator may provide service to multiple states as long as services level meets each Participating State's needs.

8.6 Account Coordinator must be familiar with all aspects of Category 2 – Fleet Card Services of the Commercial Card Solutions Master Agreement and applicable Participating Addendum.

8.7 Account Coordinator must be available to Program Administrators Monday through Friday during the Participating State's/Entity's regular business hours.

8.8 Account Coordinator will provide day-to-day account management support to Program Administrators and Cardholders.

8.9 Contractor must provide a domestic and international toll-free numbers available to cardholders 24/7/365.

8.10 Roles and responsibilities filled by proposed Relationship Manager(s). At a minimum, include how they will meet the requirements described above.

WEX assigns a Relationship Management Team lead by a Strategic Relationship Manager to each State relationship. The Strategic Relationship Manager is in charge of the overall relationship under the contract for a given State and is able to provide for and oversee all of the requirements listed above.

The role of the Strategic Relationship Manager is to ensure States and Agencies maximize the value of our program. This includes an in-depth understanding of your business and your goals so that they can provide you with the best solutions and best practices for optimal savings and usage of the program. The Strategic Relationship Manager will engage with you during the implementation of your program, and ongoing, through regular business reviews which includes a review of key performance indicators, sharing best practices, introducing new products, as well as tracking against your established policies, goals and objectives. The Strategic Relationship Manager is also available to assist with problem resolution and escalation whenever necessary.

Working with the Strategic Relationship Manager will be a Premium Fleet Service Account Manager whose responsibilities are to assist the Strategic Relationship Manager with the overall relationship as well as provide day to day operations support to the State and it's participating entities. The Premium Fleet Services Account Manager is also able to provide for and oversee all of the requirements listed above.

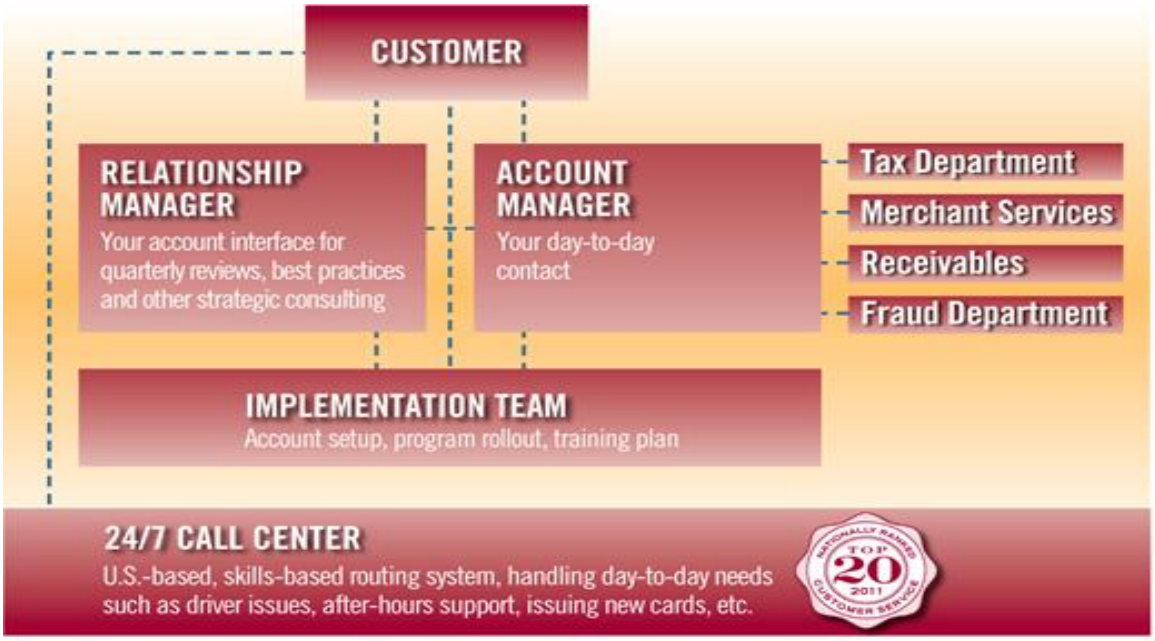
8.11 Roles and responsibilities filled by proposed Account Coordinators. At a minimum, include how they will meet the requirements described above.

At WEX, our management and staff are tasked with improving and enhancing the effectiveness and efficiency of all aspects of our service offering. Our charge is to maximize resources while creating and maintaining a balance between work expectations and personal lives. Keeping first line customer representatives invigorated and available to handle the next call requires support from an extended team of specialists to provide assistance with complex issues and ensure optimal staffing during peak call hours.

Your Premium Fleet Services (PFS) Account Manager is the primary day-to-day contact for your fleet managers/program administrators. PFS generally ensures that the program is working smoothly and also expedites all problems to their quickest resolution so that the fleet experiences minimal disruption. PFS will also serve as the liaison to any technical needs the State or Participating Entity may require. PFS will help create reporting that may not be easily accessible

to the Fleet Managers. It is the goal of PFS to ensure that the Fleet Managers have the necessary data to manage their fleets. PFS Account Managers, at a minimum, return phone calls within two business hours and return emails within 24 business hours. WEX Premium Fleet Services Account Managers are dedicated to a balanced portfolio of strategic clients. Capacity is closely managed to ensure a superior customer experience for each client.

Your PFS and Strategic relationship manager will assist facilitating requests and needs that come up throughout the life of the contract. In addition to these two roles, WEX has host of support department the Relationship Management Team will lean on to support your State through the life of the contract. Below is an outline of that support structure:



8.12 Contractor must provide a designated customer service team familiar with all aspects of Category 2 of the Commercial Cards Solutions Master Agreement and the Participating State's Participating Addendum in order to provide consistent, relevant, and effective front-line customer service via phone or on-line, 24/7/365. The designated customer service team may provide service to multiple states as long as customer service level meets each Participating States' requirements.

In addition to the Relationship Management team described in 8.10 and 8.11, WEX also provides an award winning, 24/7/365, toll-free customer service department to assist with after-hours needs, reporting lost or stolen cards, assistance in processing transactions, cardholder assistance, general accounts information, reporting fraud, invoice questions, authorization questions or help, out-of-network transaction authorizations and many more specific needs or questions a customer may have.

Roles within WEX Customer Service Call Center include:

Customer Service Help Desk is available to support service representatives with calls that require, immediate help, additional research or specialized knowledge to fleet manager, system users, drivers and merchants. The goal is to resolve issues in one call and provide an immediate response to the customer.

Customer Service Trainer is accountable for providing initial, remedial, and new program training for all CSRs. The Relationship Management Team will work with the Customer Service Trainer in support of the States and participating entities to this contract to ensure the Call center is trained appropriately and they will also develop account notes that are visible to all customer service representatives to make sure that beyond initial training on the Master Contract and Participation Addendums, they will have the information handy to them on a go forward basis as well.

Technical and Resource Planning Team is responsible for the daily management of the queues to ensure service levels are achieved. The team also provides daily, monthly, and ad hoc reporting for the call center. They forecast the resources required and manage the scheduling of associates to optimize the customer experience.

WEX employs a state-of-the-art call handling system featuring skill-based call routing. Our skill-based call routing ensures that our CSRs do not receive certain types of calls until they are fully trained to support them. We conduct a rigorous training and examination phase for all newly hired CSRs, and provide continuous refresher training to experienced staff. Only upon successful completion of the training program, are CSRs allowed to field calls from the customers, ensuring that they are able to provide the best in class service that our customers have come to expect from WEX. Experienced CSRs and team leaders monitor new staff responses to assure quality and program performance.

8.13 After-hour/holiday/weekend customer service will be provided (internally or 3rd party). If provided by a 3rd party, explain how this team is trained and access to the system and data.

The WEX Customer Service Department is available 24 hours a day, 365 days a year (366 days in leap years) and fully staffed by WEX employees who are fleet-trained in-house. The WEX Customer Service Department is always available to handle the needs of the fleet by calling the toll-free number 800-492-0669. Realizing that customer service is paramount in our relationships, WEX has kept its support within the company and aggressively invests in training, technology, equipment and industry best practices. WEX does not outsource its call center service to a third party.

8.14 System issues (bugs) communicated (acknowledgement, status of fix, resolution, etc.) to system users?

As the Premium Fleet Services Account Manager is made aware of a system issue they will communicate via email and/or via phone to the customer acknowledging the issue, providing insight around any known impacts and timing of fix. The Premium Fleet Services Account Manager will provide consistent communication and progress updates through to issue resolution. If a production defect is present, an IT ticket is opened and addressed by the product support team. If an enhancement is requested, it will be added to workflow or, if multiple teams are required to actualize, the new product ticketing system “Aha.”

8.15 Participating States and Purchasing Entities will need the support of a secure and knowledgeable team at all hierarchical levels of the Program.

WEX offers Participating States and Purchasing Entities our Relationship Management Team, including our Premium Fleet Services Account Manager, who are all tenured employees of WEX and have fleet specific knowledge. This team supports all hierarchical levels of the program. This team ONLY manages fleet-related accounts, ensuring they are well versed in the needs of state governments and fleet in general.

8.16 Contractor must benchmark customer service.

WEX uses two benchmarks as success measures: service level (the percentage of calls answered within a certain time frame) and customer satisfaction (driven by post-servicing customer survey results). Both are monthly targets. Service level is measured daily and adjustments are made on a weekly basis as required. Customer satisfaction surveys are sent to a percentage of customers post call, and our internal QA system is designed to support customer satisfaction drivers. Agent receive weekly coaching designed to improve customer satisfaction.

8.17 Contractor must have an established escalation process.

Your Premium Fleet Services Account Manager is the primary day-to-day contact for your fleet managers. He or she generally ensures that the program is working smoothly and also expedites all problems to their quickest resolution so that the fleet experiences minimal disruption. Premium Fleet Services Account Managers work hand in hand with the Strategic Relationship Manager assigned to the account as well. Should any issues, problem or concern in need of escalation, the PFS Account Manager will immediately engage the Relationship Manager. Customers can always reach out to the Strategic Relationship Manager as well directly. The Strategic Relationship Manager will work with all parties involved to ensure plan is put in place to address and resolve any issue that is at hand in the quickest and most effective way possible.

8.18 Additional customer support services.

Our fleet customers — including public sector clients — cite their customer service experience as the single finest aspect of their relationship with WEX. Our service philosophy is based on matching customer service personnel with the skills and expertise to meet large and small fleet needs at various organizational levels.

WEX will assign experienced Account Managers to large fleet Program Coordinators as the single point of contact for their programs. Program participants will also have 24/7 access to trained call center representatives (CSRs) available whenever needed. This tiered approach enables us to provide high levels of customer service at all times, as well as strategic oversight to work closely with agency contacts to improve their fleet card programs. Below are additional tools and support staff WEX employees who support the ongoing relationships:

eServices

In coordination with Premium Fleet Services and Strategic Support, eServices provides fleet support for WEX's online tool. The eServices team strives for one-call resolution and, where applicable, customer education on use of our online products.

Fraud Specialists

WEX's experienced fraud prevention professionals work with fleets, partners, merchants, and, when necessary, local and federal authorities in order to minimize fraud, misuse, and abuse of our fleet card programs. We take a three-pronged approach to mitigating inappropriate use of cards and card programs —prevention, detection, and management. The Fraud Team an extensive network of industry contacts and association memberships to ensure they are on top of new trends and developments.

Merchant Services

The Merchant Services group works closely with both our Merchant Acquisition team and our Tax Department to achieve maximum acceptance with the greatest level of tax participation possible. This work includes the recruitment of new merchant acceptance when requested by a fleet.

Strategic Receivables Services (SRS)

WEX takes a proactive and service oriented approach to reducing payment delinquency. Our team of receivables specialists (Strategic Receivables Services) works with large customers to ensure accurate and on-time billing and payment. Each customer is assigned a specific receivables specialist who will be the primary point of contact and will work closely with the account manager. Your SRS specialist will work with you to ensure that your billing structure and payment methods work well for your business and help you get the most value from your card program.

SRS specialists monitor payments on a daily basis and make contact with customers that have remitted a payment amount that does not match the amount due. In this way, past due balances are cleared up quickly, reducing the need for costly and time consuming historical reconciliation and analysis.

The WEX Customer Service Department is available 24 hours a day, 365 days a year, and is staffed by highly proficient service representatives and supervisors. The Customer Service Department is always available to answer questions, handle lost or stolen card reports, order replacement cards and authorize transactions for cardholders and Program Administrators. Customer Service Representatives are also trained to handle questions regarding account billing and reporting. Station attendants can utilize an interactive voice response system (IVR) to obtain quick purchase authorization. Program administrators can use the IVR to check balances, available credit limits, or make a payment by phone.

Customer satisfaction is the bottom line for any service organization and WEX has developed high standards for how we deal with our customers. For example, our current minimum performance goal is to have ***70% of calls answered by a person within 30 seconds.**** We set our standards for customer service by benchmarking against other card-based call centers. We then strive to exceed these standards with each call. Measured metrics include:

- Average speed to answer
- Time to abandon
- Abandonment rate
- Talk Time
- After-Call Work
- Handle Time

WEX surveys its customers to gain insight into their Customer Service experience. Our customers consistently give us high marks for the service we provide. Additionally, we record all of our calls and evaluate trends using speech analytic technology. This provides us with rich, real time voice of the customer information that is valuable for enhancing our training programs and informing our product development activities.

**Subject to change based on seasonality and call volumes.*

Customer Service Management

At WEX, our management and our staff are tasked with improving and enhancing the effectiveness and efficiency of all aspects of our service offering. Our charge is to maximize resources while creating and maintaining a balance between work expectations and personal lives. Keeping first line customer representatives invigorated and available to handle the next call requires support from an extended team of specialists to provide assistance with complex issues and ensure optimal staffing during peak call hours.

Skill-Based Call Routing System

WEX employs a state-of-the-art call handling system featuring skill-based call routing. Our skill-based call routing ensures that our CSRs do not receive certain types of calls until they are fully trained to support them. We conduct a rigorous training and examination phase for all newly hired CSRs, and provide continuous refresher training to experienced staff. Only upon successful completion of the training program, are CSRs allowed to field calls from the customers, ensuring that they are able to provide the best in class service that our customers have come to expect from WEX. Experienced CSRs and team leaders monitor new staff to assure quality and program performance.

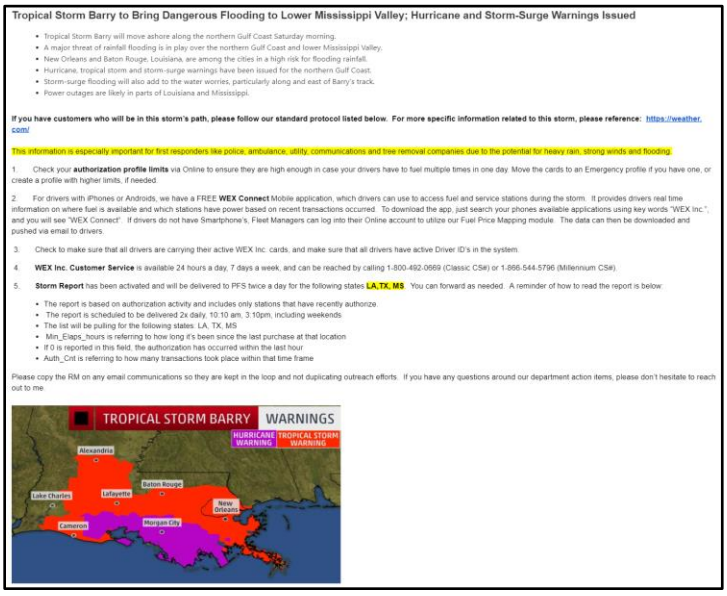
Emergency Response (Premium Fleet Services)

WEX is prepared to support the needs of our Premium Fleet Service fleets in the case of natural disasters (e.g., hurricanes, earthquakes), threats to national security, and military mobilization.

At WEX, we recognize the critical importance of keeping fuel supplies available so that public sector vehicles can operate and respond during natural disasters and other emergencies. We're proud that the fleets we serve have found our work to be instrumental in their ability to maintain continuous operations during their most crucial times of need. Some services that can be provided upon request include:

- Emergency plan development: we work with each customer to prepare a plan of response should an emergency occur
- Set up of online emergency card profiles, so you can easily remove or change your card control limits to support your emergency needs
- Regular updates outlining which networks and fuel stations are open and active in disaster areas

At right is a recent communication WEX sent to our PFS customers in preparation for the Tropical Storm/Hurricane Barry that hit the Gulf Coast in July. These reminders are provided when there is an expected event, like weather, that may affect a certain area. WEX also provides this type of notification on an ongoing basis after a major event. This type of communication would include list of fuel merchants where WEX is seeing purchasing activity so we can inform our customers of places to find fuel in the event of power or fuel shortages.



Tropical Storm Barry to Bring Dangerous Flooding to Lower Mississippi Valley; Hurricane and Storm-Surge Warnings Issued

- Tropical Storm Barry will move ashore along the northern Gulf Coast Saturday morning.
- A major threat of rainfall flooding is in play over the northern Gulf Coast and lower Mississippi Valley.
- New Orleans and Baton Rouge, Louisiana, are among the cities in a high risk for flooding rainfall.
- Hurricane, tropical storm and storm-surge warnings have been issued for the northern Gulf Coast.
- Storm-surge flooding will also add to the water worries, particularly along and east of Barry's track.
- Power outages are likely in parts of Louisiana and Mississippi.

If you have customers who will be in this storm's path, please follow our standard protocol listed below. For more specific information related to this storm, please reference: https://weather.com/

This information is especially important for first responders like police, ambulance, utility, communications and tree removal companies due to the potential for heavy rain, strong winds and flooding.

1. Check your **authorization profile limits** via Online to ensure they are high enough in case your drivers have to fuel multiple times in one day. Move the cards to an Emergency profile if you have one, or create a profile with higher limits, if needed.
2. For drivers with iPhones or Androids, we have a FREE **WEX Connect** Mobile application, which drivers can use to access fuel and service stations during the storm. It provides drivers real time information on where fuel is available and which stations have power based on recent transactions occurred. To download the app, just search your phones available applications using key words "WEX Inc.", and you will see "WEX Connect". If drivers do not have Smartphone's, Fleet Managers can log into their Online account to utilize our Fuel Price Mapping module. The data can then be downloaded and pushed via email to drivers.
3. Check to make sure that all drivers are carrying their active WEX Inc. cards, and make sure that all drivers have active Driver ID's in the system.
4. **WEX Inc. Customer Service** is available 24 hours a day, 7 days a week, and can be reached by calling 1-800.492.0669 (Classic CS#) or 1.866.544.5796 (Millennium CS#).
5. **Storm Report** has been activated and will be delivered to PFS twice a day for the following states **LA,TX, MS**. You can forward as needed. A reminder of how to read the report is below:
   - The report is based on authorization activity and includes only stations that have recently authorize.
   - The report is scheduled to be delivered 2x daily, 10:10 am, 3:10pm, including weekends.
   - The list will be pulling for the following states: LA, TX, MS
   - Min_Elaps_hours is referring to how long it's been since the last purchase at that location
   - If 0 is reported in this field, the authorization has occurred within the last hour
   - Auth_Cnt is referring to how many transactions took place within that time frame

Please copy the RM on any email communications so they are kept in the loop and not duplicating outreach efforts. If you have any questions around our department action items, please don't hesitate to reach out to me.

ClearView communities

For users of WEX Fleet ClearView™, **the Community Module** allows you to network, collaborate, participate in discussion groups on fleet-related topics (i.e. positively impacting driver behavior or reducing fraudulent spend), pose questions, and share best practice information with your fellow analytics peers.

This module features **Discussion Forums** on a variety of fleet-related topics where users can collaborate and share information, a news feed of recent Community activity, the **ClearView University** and Events calendar, and a Resources section where content can be downloaded.

The **Resources** view contains informational assets, such as, Quick Start Guides, white papers, articles, images, and release notes. Navigate to this view by using the top navigational menu.

8.19 Contractor must provide an issue tracking system.

When a service interruption or problem is reported by a customer, the contact center agent enters the information into a CRM system for case lifecycle tracking management. This would include any issues that may require additional research, off-phone work where the resolution would be provided back to the customer based upon their preferred channel phone or email. When an enterprise outage occurrence, for example, online application, there is a standard notification provided within the online application to notify customers.

8.20 If a customer has to call back or another customer calls about the same issue, how is the customer service team notified that the issue has already been explained and should be (at a minimum) in the issue resolution que?

When a service interruption or problem is reported by a customer, the contact center agent enters the information into a CRM system for case lifecycle tracking management. This would include any issues that may require additional research, off-phone work where the resolution would be provided back to the customer based upon their preferred channel phone or email. When an enterprise outage occurrence, for example, online application, there is a standard notification provided within the online application to notify customers. The lifecycle tracking also allows customer service agents to see if the same or like issue has already been addressed and be

able to communicate that to a customer. Is some cases similar issues may still need to be addressed with the individual calling and the customer service representative will work with the caller to ensure their issues are taken care of.

As the Premium Fleet Services Account Manager is made aware of a system issue, they will communicate via email and/or via phone to the customer acknowledging the issue, providing insight around any known impacts and timing of fix. The Account Manager will provide consistent communication and progress updates through to issue resolution. If a production defect is present, an IT ticket is opened and addressed by the product support team. If an enhancement is requested, it will be added to workflow or, if multiple teams are required to actualize, the new product ticketing system "Aha."

9. IMPLEMENTATION/TRANSITION

The timeline and assigned resources of the multi-state implementation/transition to a new program are critical. The awarded Contractor will be responsible to fully cooperate with the current Contractor and any State executing a Participating Addendum under the new Master Agreement during all phases of the implementation/transition.

9.1 Implementation/Transition activities will occur at no cost to the Participating States or Purchasing Entities.

9.2 Upon award of the Master Agreement and each Participating State's Participating Addendum, but prior to the effective date, many entities will transition from the current NASPO ValuePoint contract and other individual state contracts to the new agreement*. Contractor must have a pre-established account set-up process that may be customized based on the needs of each Participating State.
Note: Each state's implementation shall not exceed nine (9) months.

*If the new agreement is awarded to the currently awarded Contractor, current Participating States may choose to 'reset' (i.e. re-organize under one statewide hierarchy/short name) their State's program requiring new account set ups/transition for all current Purchasing Entities.

Contractor will be required to work with Participating State to meet implementation requirements.

After contract award and execution of the Master Agreement and Participation Addendums, WEX will begin the implementation phase at the availability of State and/or participating Entity. The WEX Relationship Management Team will enlist the help of a WEX Strategic Implementation Manager to take the lead on the implementation process. WEX is well versed in implemented large complex accounts onto our platform. In recent years WEX has successfully lead the implementation of numerous large State, Private Sector and Federal Agency accounts as well as entire card portfolios for large Fleet Management Companies as well as several Major Oil Card Programs for branded merchants.

Strategic Implementation Managers work exclusively with WEX's large fleet customers, rolling out new programs and implementing significant changes to existing large client programs. Your Strategic Implementation Manager will work with the State to create and coordinate project plans and design, lead and execute communication to ensure milestones are met. The Strategic Implementation Manager will also develop and execute training plans to ensure card holders and fleet managers are well prepared to use the program.

During the implementation, they will also prepare and distribute regular project updates, facilitate and document issues and action items and document the State's requirements for customized reporting.

Task Name	Duration	Who's Responsible
TRANSITION/PRE-IMPLEMENTATION	**20-30 days**	
Initial formal contact between WEX and fleet		Relationship Manager / Fleet
Establish contacts, addresses and areas of responsibilities between all parties		Relationship Manager / Fleet
Relationship Managers		Relationship Manager / Fleet
Fleet Manager (day to day contact(s))		Fleet
Premium Fleet Services (PFS) Account Manager		WEX
Fleet billing		Fleet
Fleet maintenance		Fleet
Fleet technical		Fleet
Determine fleet expectations		Fleet / Relationship Manager / PFS
Determine whether roll out is at once or staggered		Fleet
Finalize implementation schedule		Fleet / PFS
Establish account profiles and hierarchy requirements		Fleet / PFS
Determine needed credit line		Fleet / WEX
Determine fleet's electronic capabilities		Fleet / PFS
Determine billing requirements		Fleet / PFS
Determine reporting requirements		Fleet / PFS
Determine account maintenance (WEXOnline) requirements		Fleet/PFS
Determine fleet training needs and create training plan		Fleet/PFS
Provide format for auto upload of fleet data into WEX system		PFS
Account information verified (prior to loading)		Fleet/PFS
IMPLEMENTATION - Timeline depends upon size and complexity, but typically 60 days		

4 or 6 digit personal prompt identification number?		Fleet
Prompt IDs provided by fleet or randomly generated by WEX System?		Fleet
Determine card design and embossing requirements		Fleet
Determine card types and restrictions		Fleet
Verify card information		PFS
Establish billing process and where invoices are sent for reconciliation and payment		Fleet /PFS
Establish payment terms		Fleet/WEX
Establish rebate process		Fleet/WEX
WEXOnline – fleet user enrollment		Fleet/PFS
Test applicable billing files and reports		Fleet/PFS
Execute training plan		Fleet/PFS
Create Training materials and Driver guides		PFS
Establish dispute process		PFS
Establish problem resolution process		PFS
Issue and distribute new fleet cards (confirming receipt)		PFS
POST-IMPLEMENTATION	**30 days**	
Review first set of reports		PFS
Are reports received on time and meeting fleet's needs?		PFS
Review first set of invoices		PFS
Are invoices received on time and meeting fleet needs?		PFS
Are payments being received on time?		PFS
Survey fleet to obtain feedback on implementation		PFS

Depending on the project plan that is mutually agreed to WEX will work to meet all requirements in the allotted time. A typical implementation takes around 90 days, but that can vary based on the specific requirements a fleet may have.

Please refer to the following sample Implementation Plan for a step-by-step list of implementation activities and the responsible party. This plan will be expanded and modified to meet your specific needs, including custom plastic.

9.3 Contractor must provide an Implementation/Transition Communication Plan.

As addressed in requirement 9.2, the WEX Strategic Implementation Manager will create a communication plan as part of the overall project plan that WEX will put in place with the customer at the very beginning of the implementation. The communication plan will be mutually

agreed to and provide for how communication will happen as well as resources and training for all users who are coming on board. This plan will call out any needed staff resources, how communication should take place as well as timing of any necessary communications and training.

WEX has been in the fleet fueling business since 1983, and has a long history of efficiently and effectively implementing fleet fueling programs for many of the largest commercial and government fleets in the United States. We believe customers who have worked with WEX, such as the references included in this response, will agree that our implementation process is unsurpassed when compared to our fleet card competitors. See sample implementation plan above for reference.

9.4 Contractor must provide qualified personnel during the implementation/transition process.

WEX would replicate the proven implementation process detailed above in 9.2 and 9.3 and engage the proper contacts at each of the participating entities, optimizing the sequence of implementation by the project plan that is put in place following the first meeting. Additionally, WEX will work to schedule group online training session, recorded training session and additional trainings in person as needed or required.

9.5 Contractor must provide Implementation Training Plan for all Purchasing Entities.

WEX would replicate the proven implementation process detailed above in 9.2-9.4 and engage the proper contacts at each of the participating entities to put in place project plans to ensure the above requirement and all other needs are met.

9.6 Contractor must provide access to online test-environment for Participating State and Purchasing Entity testing during all phases of the account setup process. The system must look, act, and demonstrate all aspects of the "live" system.

Although WEX does not have a customer-facing testing environment, we typically provide account access at the time of account creation to users who desire early access. This is done so customers can familiarize themselves with the site as the WEX Strategic Implementation Managers are standing up all of the specific aspects of the account for the end-users. This process allows fleets to see how their actual account's specific details will look and feel. In terms of online or in-person training, WEX also provides access to the actual system interface and can walk users through typical set-ups in live webinars or other in-person training.

9.7 Contractor must agree that at the end of any applicable Master Agreement or Participating Addendum, should any Participating State conduct another procurement and award a new contract, the Contractor will work with Participating State to ensure that an efficient and effective transition takes place within nine (9) months.

WEX agrees to this requirement and that we would make every attempt to ensure that contract close-out and transition to a new contractor is successful, and would assign a close out and transition team to carry this out. This team will be assigned by WEX no later than one hundred twenty (120) calendar days prior to expiration of the Contract.

WEX understands that the State may have a need for WEX to continue providing any part or all of the services required under the Contract for a period not to exceed one hundred twenty (120) calendar days after expiration or termination of the Contract. If this need exists, upon written notification by the State, WEX will provide services for that period or until the State notifies WEX in writing to cease providing services, whichever is sooner.

Coordinating the card, driver and account terminations in our system to coincide with the timing of their transition has been our primary focus and action. WEX will continue to provide reporting as needed, communicate with the customer about how long they will need online access, and either only suspend the accounts accordingly until online access is not needed and then terminate the accounts and associated online logon(s). We will work with the customer to establish a reasonable date or phase out of WEX card usage, so that there is no interruption in service, and keep credit on the account accordingly if there are no credit issues. If there are credit issues we will communicate with the customer and the bank to work out a plan to switch to the new provider when needed. The goal of the plan and the continuous communication to the fleet is to provide uninterrupted fueling and reporting. All of these activities are performed by an account manager per an authorized fleet contact request.

10. PROGRAM GROWTH

Throughout the life of the Master Agreement/Participating Addendum and through the growth of each Participating State's programs, it can be anticipated that new Purchasing Entities and new cards within exiting Purchasing Entities will need to be added.

10.1 As the marketplace changes and technology advances, card products and service may also expand. If the awarded Contractor proposes an additional product or service, that request must be submitted to the Lead State for review and approval. Request must include:

- Full description of product/service;
- Full implementation plan, including level of effort and timeline;
- Full communication plan; and
- Full training plan.
- New card products and services must not impact the rebate/incentive share or have any additional cost to the Participating States or Purchasing Entities. Addition of any card product or service to the Master Agreement is at the sole discretion of the Lead State. Participating States will have the option to allow or exclude new card products or services in the Participating Addendum.

10.2 While the goal is for a majority of Purchasing Entities to enroll in the program prior to the program effective date, it is understood that some Purchasing Entities will need to be integrated after the program effective date and additional Purchasing Entities will join throughout the program term.

WEX would encourage full participation at the outset to maximize training resources and transmit standardized information to all participating entities. However, WEX has no issues in meeting this requirement and providing whatever levels of support for the on-boarding of the new participating entities individually as they join.

10.3 Adding cards to an active Purchasing Entity account.

An active purchasing entity account requires no extra paperwork or agreement to add cards to that account. As long as an authorized contact is making the request.

Fleet Card Enrollment Process: Existing State Agency Accounts

Program administrators can add cards and drivers via the Fleet Manager WEX's online module named, WEXOnline®, through WEX customer service or the State's Premium Fleet Services Account Manager. The Premium Fleet Services Account Manager is a one to one point of contact

assigned to the State to day to day operation support and account needs. The Fleet Manager module allows the fleet manager to add, edit, suspend, reactivate, and terminate cards and drivers, to add and manage card controls, and to view and download invoice details. You can also:

- Assign card to driver, vehicle or location
- Transfer cards from one account to another
- Group cards into authorization profiles to enforce your purchasing policies
- Create organizational units or departments to better organize cards, vehicles and drivers for reporting and management purposes (initially added during the implementation phase)
- Edit account information

Card orders: WEX will process requests for replacement cards for lost, damaged, or stolen cards within one business day. If notification is received by 3:30 p.m. Eastern Time, you can have cards sent that day. You can use your own shipping account number or be charged a fee to cover the shipping costs. The WEX overnight fee, is included in the pricing evaluation for the RFP. If a WEX card is lost or stolen, it should be reported immediately to our Customer Service Department by calling the toll-free number**.** The Customer Service Department is available 24 hours a day, 365 days a year. The fleet can also notify WEX of the loss, theft, or unauthorized use of any card or account electronically through WEXOnline®.

10.4 Contractor is expected to promote the card program.

WEX currently provides fleet fuel cards for 24 states, and has governmental and tax-exempt customers in all 50 states. Our State customers represent more than 375,000 cards. Additionally, WEX provides fleet card services as a subcontractor to Citibank under the Federal Government's GSA SmartPay 3 Charge Card Program for the GSA Fleet, as well as to the Departments of Homeland Security, Energy, Treasury, and Agriculture. These federal government customers have more than 320,000 cards. In total, WEX services more than 1 million tax-exempt cards.

WEX offers and actively markets its card programs to municipal and other public entities within member states so as to extend the benefits of the program throughout member states. See **ADDENDA** for examples of how WEX markets its government card programs to political subdivisions within a participating entity.

WEX employs an outside sales team as well as two inside sales representative who are dedicated to Government Contract Support for promoting and onboarding eligible entities to support contract growth. In addition to these resources, WEX actively participates in government-specific trade shows and associations to actively promote and sell our products and services to grow our contracts. Some of these events include the NASPO Exchange, NCSFA, NIGP, NAFA, GFX, state-specific shows showcasing their contracts, and many others.

Over the years, WEX has seen tremendous growth and high retention rates for all our state-held contracts, cooperative contracts, and political subdivision participation within those contracts.

11. CARD DESIGN/EMBOSSING, DELIVERY & ACTIVATION

11.1 Contractor shall be responsible for the embossing and printing of the cards to each Participating State's specifications. Each Participating State will be responsible for furnishing the necessary artwork (digital file) to the Contractor.

11.2 Each Participating State reserves the right to change the card design during this contract, and if doing so, will provide the artwork needed to make changes.

11.3 Contractor must be able to deliver cards overnight when requested by the Purchasing Entity.

11.4 Customization options to the front side of the card will include verbiage and/or logo or graphic and embossing including but not limited to:

- Participating State
- Purchasing Entity
- Program/Department Name
- Cardholder Name
- Picture/Logo
- Phrase (i.e. "FOR OFFICIAL USE ONLY")
- Embossing Line, ALPH OR NUMERIC VERBIAGE
- Contractor supplied options

Card embossing, production, and distribution process.

WEX is able to meet the above requirements as stated. Our embossing capabilities and card design enable customers to customize the information that is imprinted and printed on the cards. There are two lines for embossing. The first line is usually designated for the account name, while the second line can be used to identify the associated equipment or driver. Each line will accommodate up to 24 characters. The account number, card number, product restriction (such as "Fuel Only"), and expiration dates are printed on the front of the card. Embedded in the card's magnetic strip are the card number, expiration date, prompt, and restrictions, if any.

The WEX Fleet Card is a standard-size plastic charge card with an encoded magnetic strip on the back. The strip is encoded with the account and card information which, when read at the point of sale, is married in our systems with Level III data obtained during the transaction.

Although we use the highest grade plastic that is rated for longer periods of use, our standard term for card expiration is three years. WEX uses a three-year active period for our cards due to the wear and tear on the magnetic strip that requires a card to be replaced for optimum performance. WEX ships new cards 45 days prior to expiration to ensure that your drivers will never be without an active card. On request WEX can renew cards earlier than the standard 45 day prior to expiration to allow the fleet more time to swap out cards. Some competitors offer longer card terms on equally rated card stock prior to replacement. We prefer to replace cards before they become problematic for your drivers and detrimental to the efficiency of your fleet operations.

WEX will process requests for replacement cards for lost, damaged, or stolen cards within one business day. If notification is received by 3:30 p.m. Eastern Time, you can have cards sent that day. You can use your own shipping account number or be charged a fee to cover the shipping costs.

If a WEX card is lost or stolen, it should be reported immediately to our Customer Service Department by calling the toll-free number**.** The Customer Service Department is available 24 hours a day, 365 days a year. The fleet can also notify WEX of the loss, theft, or unauthorized use of any card or account through WEXOnline®. Subject to any limitations imposed by applicable law, the fleet will be liable to WEX for all unauthorized use of a card until you notify us of such use.

Once a card has been reported as lost or stolen, it is immediately invalidated in the WEX system. After cancellation, all electronic authorizations associated with the card are declined at the time a purchase is attempted. Once WEX receives proper notification, the fleet will be relieved from liability for any subsequent charges to the card.

WEX will work with each participating entity to customize plastics types.

11.5 Physical cards will be delivered to the Purchasing Entity or Cardholder at the address specified by the Purchasing Entity.

WEX cards can be shipped directly to the address specified by the user making the card order. Standard card orders are set to go out via Standard US Mail at no charge. WEX does offer expedited shipping options of overnight and two-day shipping. WEX cards can also be delivered using the carrier specified by the fleet (e.g., the U.S. Postal Service, FedEx and UPS). There is a fee for expedited orders if you choose not to use your own shipping account. For all card orders of five or more cards, WEX ships via USPS Parcel to provide a tracking number for the order. This is done at no extra cost and helps provide visibility into card orders that would not be trackable through regular mail.

11.6 Purchasing Entities must be able to decide if cards are delivered active or inactive.

WEX typically ships cards in active status. WEX can accommodate cards being shipped inactive; we only need to be notified of that request at the time of card order. We will change the cards to suspended status once the file is sent to our card production. Card status can be changed to active when the customer is ready to begin using the cards. WEX cards can also be suspended on arrival by authorized users and WEX can assist with any mass card activations on our end.

11.7 Purchasing Entities need to have the ability to have cards delivered in batches (i.e. Division A, Program 1) as determined by the Purchasing Entity.

The customer can order cards in batches using the WEXOnline® module or the Premium Fleets Services Account Manager can work with the customer to order new cards or reissue cards in batches using a Data Collection Document (DCD) for orders exceeding 100. The PFS Account Manager has access to and can provide to the customer delivery tracking information for USPS card orders totaling five or greater and tracking on expedited card orders at no additional cost.

11.8 Card re-issuance.

Accounts can be set up with different expiration dates, and account expiration dates can be changed by the account manager to renew early. Both measures are precautions to avoid a mass-reissuance of cards.

In the normal course of business, files of reissuance cards are sent to the vendor on the 1st and 15th of the month prior to the month in which cards expire. Cards expiring on August 31 are sent to the vendor on July 1 and 15. Cards are completed and mailed to the customer within seven business days of receipt of the file and shipped via regular mail.

For Purchasing Entities requiring more time, WEX can perform an early card renewal given the entity the time needed to complete their re-issuance. This is available on request from the entity to the Premium Fleet Services Account Manager.

11.9 Mass re-issuance of cards for a Purchasing Entity avoidance process.

Accounts can be set up with different expiration dates, and account expiration dates can be changed by the account manager to renew early. Both measures are precautions to avoid mass-reissuance of cards.

WEX is flexible in that we are always looking to work to meet the needs of our customers. If there are specific re-issuance scenarios a fleet may be concerned about, WEX will work with that entity to mitigate and put in place precautions to avoid a mass re-issuance scenario.

12. TRAINING

Initial and ongoing training are critical to each Participating State's ability to manage their program. Each Participating State may have additional training requirements and will be negotiated in the Participating Addendum. At a minimum, training will include:

12.1 Contractor must provide System User Guides online and accessible through the web-based card management system.

12.2 Contractor must provide ongoing training for the life of the contract. WEX will provide initial training at agreed upon sites, ongoing as-needed training, and re-training as required via the following delivery methods: in-person training, webinars, phone conference or a combination of those.

Upon the initial implementation, your WEX Strategic Implementation Manager will train the fleet management team in how to perform the following functions. Online or in person system training typically takes 60 to 90 minutes, depending on questions:

WEXOnline® Account Maintenance

- User ID/Password Creation and Site Overview
- View Hierarchy/Account Search
- Card Maintenance
- Vehicle Maintenance
- Driver Maintenance
- Invoices
- Authorization Controls
- Address/Contact Management
- WEXOnline® Account Financials
- Accounting Fields/Codes
- Accounting Profiles
- Transaction Management
- WEXOnline® Reports
- Ad hoc Reports
- Exception Reports
- Custom Report
- Standard Reports
- WEXOnline® Resource Tools
- Accepting Locations
- Fuel Price Mapping

- Alternative/Diesel Fuel Directory
- WEX Index Top Metro Report
- WEXOnline® Administration
- View /Add Online Users
- View Pending Requests
- Add/View Roles and permissions

Training can be divided into specific segments depending on the administrator's duties. WEX will work with the State to organize tailored online training per users' assigned roles.

WEX will provide recorded training sessions that can be posted to the State's intranet site as an additional tool. Multiple trainings can be recorded based on the audience's role e.g., full access or read only.

12.3 Contractor must provide web-based training.

WEX is able to provide training for all of the above requirements and will hold ongoing WebEX and in-person training sessions at a frequency determined by the State of Washington/NASPO and any other Participating Entity. For instance, WEX could host monthly WebEX/online trainings for new employees and those who need refresher training. Items included in the training are customizable depending on the need, but typically consist of all of the needs mentioned in Question 12.3 plus:

- Program policies as dictated by the member states
  - Card usage at retail locations
  - System access
  - Customer Service Support
  - Updated technology
  - Best practices
  - Industry trends

12.4 Contractor must provide onsite/classroom training for Program Administrators

WEX agrees to and will hold onsite, in-person training sessions for Program Administrators at a frequency determined by the State of Washington/NASPO and any other Participating Entity.

12.5 Contractor must provide onsite User group forums.

WEX will hold ongoing in-person training and user forum sessions at a frequency determined by the State of Washington/NASPO and any other Participating Entity for whatever subject matter, best practice sharing, account reviews, raising concerns or any other need the customer may have. Many times these user forums are a great time for Participating Entities to share new or reinforce existing polices as well for their users. Items included in the forums are customizable and can meet all of the above requirements.

12.6 Contractor must provide written User reference guides, both extensive and quick guides.

WEX will provide reference guides that are detailed and provide quick summaries as part of the implementation project plan. Other reference guides exist throughout WEX's various systems. For example, The WEXOnline® module has PDF help guides that provide step-by-step instructions to navigate the different modules available.

The following PDF help guides are available:

- Homepage. View news and events, pending online user requests, flexible exception report notifications, and search and select both accounts and organizational units.
- Fleet Manager. Managing cards, drivers, vehicles, authorization profiles, accounts, org units (or departments), contacts, and addresses.
- Financials. Provides access to accounting fields and definitions, and allows you to assign financial profiles throughout your hierarchy.
- Reports- Guides the user through the various reporting tools to meet your analysis needs.
- Resource Tools. offers various, commonly-requested reporting tools to help locate sites where your fleet card can be used, to assist you in finding diesel and alternative fuel sites, and to direct you to locations with the lowest price per gallon.
- Administration. Manage online users, view the roles and permissions to which these users are assigned; create custom roles to meet your security needs.

The Implementation Manager will also work with the Agency to create a WEXOnline® Summary Guide that outlines how agency nuances and requirements will be captured and reported through the system as well as quick-step guides for the online system.

12.7 Contractor must provide updates to the user guides will be proactively communicated.

Improving our end-user assistance, WEX is shifting away from static PDF user guides in favor of an online contextual and embedded help management system that's always available and is updated dynamically. PDF user guides will remain available on the site as we continue to add embedded content to the contextual and embedded help management system.

- New contextual and embedded help management system content is prioritized based on information communicated from the call center, account reps, and direct user feedback. When new information is added, on-screen alerts appear.
- Adding new contextual and embedded help management system content is ongoing, and new walk-throughs are added as quickly as resources and capacity allow.
- Our site is coded such that video content can be generic or, if state-specific tutorials are available and supplied to WEX, branded by state.

12.8 Additional training.

During the implementation phase WEX will source feedback from user to craft training to ensure customer input is received, needs are prioritized, training is tailored, the venue it needs to be presented in and how it is communicated. At the conclusion of the implementation, the Implementation Manager will create a final document outlining the program as implemented for a given Participating Entity and capturing the nuances of the different Agencies along with any customized servicing or reporting that has been designed for your team. This is a collaborative process between the customer and WEX and will be maintained throughout the life of the contract for support on an ongoing basis.

See the response in 12.7 regarding how our system also provides dynamic training updates with pertinent on-screen alerts that notify of new training topics and learnings supplied by our call center, account reps, and direct user feedback.

WEX will also provide training on an ongoing basis as technical releases are completed to ensure the Agencies are taking full advantage of all the WEX offerings. Your Strategic Relationship Manager along with your Premium Fleet Services Account Managers will work with the

Participating Entities to schedule additional training sessions as required or requested after the initial implementation is completed.

12.9 Reserved

13. RESERVED - See Payment Terms Section 6.

14. LIABILITY

14.1 Purchasing Entities shall have no liability for lost or stolen cards upon notification to the Contractor or fraudulent use of any card products.

15. FRAUD PROTECTION

15.1 Contractor shall report fraud transactions, and the resulting credit issuance(s) to the Cardholder and the Purchasing Entity Program Administrator through real time notifications.

15.2 Contractor or system must be capable of providing a daily (at a minimum) fraud and declined transaction report as requested by the Purchasing Entity.

15.3 Contractor must provide external fraud protection coverage for the following types of occurrences including, but not limited to:

- lost/stolen cards
- counterfeit cards
- skimmed cards
- unauthorized internet transactions
- fraud patterns
- account takeovers

Fraud protection coverage plan.

The WEX Fraud team looks for and provides protection coverage for the types of occurrence listed above. In our experience, efforts by WEX's Fraud Department, in tandem with a customer's use of a fleet management policy; controls; and alerts, along with careful review of all reports, including exception reports, helps substantially reduce exposure to abuse and fraud, and any associated losses.

WEX has instituted business practices designed to help you detect and reduce fraud and/or misuse of the WEX card. WEX's Fraud Department performs three primary functions in an effort to identify and mitigate fraud on our fleet customers' accounts:

Primary Functions
● Review Transaction activity
● Identify potentially abusive or fraudulent behavior
● Notify customers when such behavior occurs

Our Fraud Department makes every effort to detect unusual or excessive purchase activity using constantly evolving techniques and reporting. If such activity is detected, an analyst will contact the fleet manager to bring it to their attention, noting details such as:

"Red Flag" Activity Indicators
● Date and time of purchase
● Merchant location
● Product purchased
● Driver identification number used to conduct the sale
● Dollar amount

Our Fraud Department has been instrumental in providing recommendations to prevent fraud from occurring, proactively working to identify fraudulent transactions, and working closely with fleets, merchants and appropriate authorities to minimize losses and prevent such situations from continuing or recurring.

WEX will terminate compromised cards within 48 hours if there are no fraudulent transactions. If WEX discovers a suspicious transaction, the card is terminated immediately and WEX will attempt to contact the fleet for verification. If the transaction proves to be legitimate, WEX can reactivate the card.

There are currently approximately 40 members of in WEX's fraud department. WEX works with state and local law enforcement, in all 50 states, in an effort to prosecute those who commit fraud with the WEX card.

WEX only covers liability for losses for counterfeit/skimmed transactions. For lost or stolen cards, liability only applies after the customer reports a loss.

If a WEX card is lost or stolen, it should be reported immediately to our Customer Service Department by calling the toll-free number. The Customer Service Department is available 24 hours a day, 365 days a year. The fleet can also notify WEX of the loss, theft, or unauthorized use of any card or account through WEXOnline®. Subject to any limitations imposed by applicable law, the fleet will be liable to WEX for all unauthorized use of a card until you notify us of such use.

Once a card has been reported as lost or stolen, it is immediately invalidated in the WEX system. After cancellation, all electronic authorizations associated with the card are declined at the time a purchase is attempted. Once WEX receives proper notification, the fleet will be relieved from liability for any subsequent charges to the card.

15.4 Contractor must provide program screening activity for external fraud patterns and the process for communicating potential external fraud with Cardholders and Program Administrators.

In recent years, white plastic fraud has become the most significant form of fraud in the fleet card industry. White plastic is the result of a third party stealing card information and loading that information onto a new card for the purpose of conducting fraudulent transactions. In the cases that we see, the data is primarily acquired through devices placed into Automated Fuel Dispensers (AFDs). The devices allow the perpetrators to capture the card numbers, Driver IDs, and odometer readings as they are input at the pump. It is important to know that it's not just WEX cards that

are affected by gas pump skimming; any other gas or bank card used at the same pump during the time a device is in place is also at risk of being compromised.

WEX uses the data available to us in an attempt to discern the Point of Compromise (POC) for each identified occurrence of white plastic. We use this data to review other cards used at the same location during the same time period for possible abuse. Based on this information and other variables, we determine which cards are most at risk for having white plastic created.

WEX also regularly communicates fraud patterns to our customers on an ad-hoc basis.

Finally, as a global payments innovator with more than 35 years in the market, WEX has developed SaferPayments, a **true 24/7 real-time system** that prevents fraud by intercepting fraudulent transactions "in-flight," generating case queues for subsequent investigation and, in specific cases, triggering email alerts to customers.

SaferPayments is capable of preventing fraud at the holistic individual portfolio level, either during the authorization process or at the payment gateway. SaferPayments can prevent first party fraud and enforce business policies in one single instance for a true multi-channel/ multi-portfolio application. SaferPayments has been carefully programmed to prevent the authorization of the highest number of suspicious transactions possible without negatively impacting the customer experience by minimizing the number of "false positive" transactions that are stopped.

SaferPayments is an artificial intelligence based software that identifies risky transactions during the authorization process within milliseconds to prevent the degradation of authorization response times from the WEX authorization system. Transactions above a certain "suspicious level" will be declined, while all other transactions will be allowed to pass. SaferPayments delivers exceptionally accurate results at high fraud detection rates without impacting the customer experience. SaferPayments can detect anything from an unauthorized transaction due to a lost or stolen card, a compromised account (skimming, data breach, account takeover), or a potentially illicit transaction (money laundering, drug smuggling, etc.).

SaferPayments can both detect *and* prevent fraud. SaferPayments is both versatile and easily configurable, allowing WEX to maintain the fraud models internally, yet still provides robust fraud management capabilities. Using advanced machine learning algorithms, SaferPayments continuously "learns" as it aggregates transactions streaming through the solution to detect trends at a portfolio, customer, channel, product, and transaction level. WEX controls the settings that allows the WEX transaction authorization system to "pass", "pass, but flag for review", or "deny" any transaction or group of transactions.

Most traditional "neural" or "anomaly detection" software solutions rely heavily on pre-coded patterns of transactions or geolocation monitoring. They lack the ability to learn as they go and monitor all levels of a card portfolio. They also will typically only "flag" a transaction for review, but may not be able to actually stop a potentially fraudulent transaction from getting through the authorization process.

SaferPayments "learns" as it streams transactions through its logic. SaferPayments is able to monitor trends and activity at the portfolio, channel, customer, product, and transaction levels.

The logic within SaferPayments is highly configurable and as fraud trends are identified, will apply past learning, patterns, and trends to new transactions that stream through its logic engine. SaferPayments has multiple levels of detection which can actually prevent a transaction from authorizing or can flag a transaction for review by the fraud team depending upon scoring logic.

SaferPayments model maintenance requires no vendor intervention, enabling WEX to update models internally on a daily basis.

15.5 Fraudulent charges and communication.

WEX sends an immediate email notifying of potential fraud transactions. We don't execute massive "block and reissue" of potentially compromised cards. Our strategy involves enhanced monitoring of cards involved in a compromised event using Safer Payments decision intelligence (see 15.4).

15.6 Fraud deterrent of an EMV chip.

WEX will begin issuing chip cards in 2020 and will have a proprietary chip card live in market before the scheduled EMV liability shift in October 2020. This is in accordance with the industry wide movement led by the major card brands to require EMV chip usage at pay-at-the-pump fuel terminals.

An added benefit of the WEX chip cards will be that card renewal cycles will go from three years on current plastic to five-year renewal cycles (card expiration date). This will give fleets that added benefit of not having to deal with card swap outs due to expiring cards as often and help relieve some of that administrative burden.

WEX's current WEX Spec Compliance Policy requires that all WEX accepting merchants are able to accept a WEX chip card by October 2020 or merchants will cover the costs of any counterfeit fraud.

WEX developed its proprietary chip card in partnership with FIS, Multos and Gemalto, world-class leaders in chip card technology. This is the first fleet-centric chip applet designed specifically for the U.S. fleet industry, spec-based and customized for WEX Fleet.

Despite technological advances WEX is developing in the card, not all retail fuel merchants will choose to invest in chip card readers at the point of sale or at outside payment terminals due to the significant financial investment required. Some merchants will accept the risk of liability for fraudulent transactions. Because of this, the WEX Fleet card will have both a chip and magnetic stripe for many years to come.

WEX has taken a thoughtful and comprehensive approach to its chip card development:

- Because WEX’s reputation is based on customer security and satisfaction, WEX chose to use a proprietary chip applet -- not a consumer based chip applet -- in order to continue to be the market leader in Fleet technology.
- The WEX research and development team initiated planning years in advance with a goal to define a lasting standard, and to release the highest quality solution for commercial fleet at the right time.

- WEX is building a WEX Chip Issuance Roadmap to provide a seamless transition to WEX chip cards for our fleet customers.
- WEX also is working directly with our WEX-accepting merchants, their payment processors and their POS/pin pad vendors to build and to ensure compliance of the WEX chip.

15.7 Contractor or system must provide a way for Purchasing Entities to report fraudulent activity, lost, or stolen cards. Purchasing Entities also know it is important to be able to verify credentials of someone reporting such activity.

If a WEX card is lost or stolen, it should be reported immediately to our Customer Service Department by calling the toll-free number. The Customer Service Department is available 24 hours a day, 365 days a year. The fleet can also notify WEX of the loss, theft, or unauthorized use of any card or account through WEXOnline®. Subject to any limitations imposed by applicable law, the fleet will be liable to WEX for all unauthorized use of a card until you notify us of such use.

WEX will process requests for replacement cards for lost, damaged, or stolen cards within one business day. If notification is received by 3:30 p.m. Eastern Time, you can have cards sent that day. You can use your own shipping account number or be charged a fee to cover the shipping costs.

Once a card has been reported as lost or stolen, it is immediately invalidated in the WEX system. After cancellation, all electronic authorizations associated with the card are declined at the time a purchase is attempted. Once WEX receives proper notification, the fleet will be relieved from liability for any subsequent charges to the card.

WEX actively works with authorities at both local and federal levels to help authorities identify and apprehend individuals associated with White Plastic and/or Skimming. This level of engagement sometimes involves undercover surveillance which could be jeopardized by an unknowing individual pursuing an investigation on his or her own.

WEX may assume liability (financial loss) for white plastic cases. WEX may also require the impacted fleet to submit a dispute form or an Unauthorized Use Affidavit. This notarized document may be requested should the matter be prosecuted and it enables WEX to submit information in a court proceeding as evidence. Without the formal notarization, the claims we are prosecuting on your behalf may be disallowed.

It is important to remember that diligence and responsiveness are also important for fraud mitigation:

- Timely review of transaction data and reports is critical to fast identification of suspicious activity.
- Expeditious reporting (including submission of the Unauthorized Use Affidavit, if requested) of any suspicious transactions.
- Drivers should be encouraged to report to Customer Service anything unusual at stations, such as a pump that may have been tampered with/opened or a card reader that appears abnormal.

15.8 Contractor or system must provide a way for Purchasing Entities to track reported fraud transactions to completion (closure).

WEX offers a comprehensive fraud prevention and management program. Most recently, we have been beta testing an enhanced customer facing claims management interface with a large government customer. This tool allows customers to view each claim, the claim number, type of claim, card number, date reported, age of claim, total dollars, claim status and date of resolution. Upon resolution, an email is sent to the fleet for notification. The information in the interface can be exported into a report (on demand or scheduled) so it can be easily shared with others in your organization. Once beta testing is complete, we expect to deploy this solution to other large customers. We expect this to be in place before the contract effective date of January 1, 2021.

15.9 Contractor or system must be able to resolve mass attacks (i.e. fraudulent low value charges on multiple cards at once) without requiring action from the Purchasing Entities.

This type of attack is not a risk to WEX Fleet card holders, as our transaction processing occurs on a closed-loop network, not over the Internet.

Regarding other Web-based applications, OWASP standards are built into development processes, and manual testing is performed in addition to peer review as required by our SDLC. WEX uses an automated dynamic application security testing (DAST) solution that scans web applications to find vulnerabilities and provide guidance on remediation.

WEX receives vulnerability announcements for relevant systems from vendors, third parties, NIST, FDIC, FBI, and other threat feeds, and has a dedicated security operations team managing and maintaining the vulnerability management program. The vulnerability management procedure requires a ticket to be generated and assigned to Information Technology operations teams for patching.

16. DISPUTED TRANSACTIONS

Purchasing Entities will pay according to the contract payment terms; however, in instances of dispute, the charges must be placed in suspense until there is resolution. The Contractor must propose a timely dispute procedure to ensure that the payment network charge back rights do not expire. If upon resolution of a dispute it is found that the transaction was actually an authorized charge, the Participating Entity will be liable for the payment within the payment terms as described herein.

16.1 Contractor must provide a resolution procedure for dealing with disputed transactions resulting from unauthorized charges, errors in cardholder billings, or problems with charges for merchandise or services that are not resolved between the Cardholder and Merchant.

Disputed Transaction Detail

- How users will notify the Contractor
- Ability to dispute transactions electronically as well as track through final resolutions of the charge
- Instructions for cardholders
- Instructions (including invoice adjustments) for billing offices
- Provisions for prompt investigation of disputed items

- Provisions for reporting/disposition on resolution of dispute to cardholders, approving officials, Program Administrators, and billing office
- Provisions for system identified disputed related credit or payment on resolved dispute.
- Any limitations on the timeline of disputed transactions.
- Any details on what components of the transaction can be disputed

The WEX transaction dispute process is outlined below:

1. A customer must notify WEX in writing of a disputed transaction within sixty (60) days of the billing date of said transaction. WEX requests that the customer to provide as many details regarding the transaction and the reason for dispute as possible, including, but not limited to the following: card number, driver identification number used, transaction date and time, transaction dollar amount, and reason for dispute. Additional information may be requested as necessary to facilitate the investigation. When a Purchasing Entity disputes a charge, the disputed amount is temporarily or permanently credited in the current billing cycle and is removed from the amount due on the next available invoice. As such, the amount due shown on every invoice will be less the disputed amounts that occurred since the last invoice was created. Purchasing Entities shall pay the exact amount set forth on each invoice to avoid a credit being taken twice once the dispute is resolved and the final credit is applied.
2. The Participating Entity's written dispute is then forwarded to the applicable department for follow up and investigation. If the dispute involves an allegation of abuse or fraud, it will be handled by the Contractor's Fraud Department and the dispute process may vary from the standards as outlined below depending on the nature and validity of the claim.
3. If the disputed transaction occurred inside the fueling location and required a signature from the cardholder, the Contractor may request a copy of the sales draft from the merchant. As a result of the ticket request, the Participating Entity will receive a temporary credit memo on their invoice noting that a transaction is in dispute.
4. Once the applicable merchant provides a copy of the sales draft, it will be reviewed for compliance with the fleet program. If the Contractor determines that the sale is valid in accordance with the program, the disputed charge balance will be carried forward for payment and will be subject to applicable late fees. Payment is expected during the next billing cycle. Copies of the sale draft are then forwarded to the Purchasing Entity for review.
5. In the rare event that the transaction in question is determined to be a duplicate transaction, it is not necessary for the Contractor to request a copy of the ticket from the merchant. After receiving the Purchasing Entity's dispute in writing and confirming that the transaction is a duplicate, the Contractor will permanently credit the account within five (5) business days.
6. If the disputed transaction occurred at an automated facility, a copy of the sales draft would not be available as no signature is required and swipe of the card into the card reader establishes that the card was present at the time of sale. Pursuant to the terms of our Agreement, "…use of a Card and DIN and entry of the applicable sales data into the card system will evidence (your) Agreement to pay for such purchases."
7. In the rare occasion that a technical error occurred at an automated facility, the Contractor will perform an investigation into the dispute sale.

8. Upon conclusion of the investigation, the Contractor will communicate the outcome of the investigation to the Purchasing Entity. If a credit for a disputed transaction is warranted, it will be applied against the current billing period.

**Disputes of* WEX*Pay™ transactions are subject to the MasterCard dispute process.*

Online Dispute Process

Provisioned users can use WEXOnline® to request ticket copies, initiate a transaction dispute on a single or multiple transaction(s), and maintain visibility until resolution.

Current rules about what types of transactions cannot be disputed (e.g., private site, transactions, aviation transactions, island card reader, etc.) still apply. Onscreen instructional text and error messaging will be displayed if a transaction doesn't meet the dispute criteria.

Fraud-related dispute requests can be initiated within WEXOnline®, but due to their urgent nature, these disputes are immediately routed to the WEX Fraud Department for analysis and review. Given their sensitive disposition and circumstance, information about fraud-related disputes, including their status, will not appear in WEXOnline®, and instead will follow existing communication channels.

WEXPay™ transactions cannot be disputed online and must follow the existing process. Onscreen error messagingWEXPay™ transactions cannot be disputed online and must follow the existing process. Onscreen error messaging with a hyperlink to the dispute form will appear if this type of transaction is selected.

17. CARD ACCEPTANCE

17.1 Card acceptance is critical to state business and is a scored element of this Competitive Solicitation.

The WEX Fleet Card offers acceptance in all 50 states, at more than 95% of U.S. retail fueling locations, all of which provide Level III data. The card is accepted by all major oil companies and fuel retailers, as well as independent merchants, in urban, rural, and remote locations. The WEX Fleet Card is also accepted at approximately 4,500 locations in Canada. Although the number of accepting locations fluctuates due to gas and service stations opening and closing, the WEX card is currently accepted at more than 132,000 retail locations. Of these, approximately 120,000 offer fuel or both fuel and service; approximately 32,000 offer service or both fuel and service.

WEX Fleet DriverDash, our free mobile fuel payments platform, is now accepted at more than 25,000 US fueling locations, with frequent new acceptance announcements. DriverDash is an industry-first, fleet fuel card mobile payments application. WEX Fleet DriverDash sets the fundamental framework and acceptance for how future payments will be made, including by the vehicle itself. As connected car technology grows and becomes more accessible, the need for these type of mobile payments applications and interfaces will continue to grow. Mobile payments are safer, more secure, and provide a greater level of flexibility and accuracy for what can be prompted for at the time of purchase.

WEX is always increasing its acceptance coverage for fuel, marina and service locations. Because we currently have acceptance at more than 95% of all U.S. fuel sites, our merchant acquisition strategy is driven by the needs of our fleet customers requiring service in remote areas or acceptance outside of domestic coverage. If a fleet customer identifies specific fueling needs, WEX will work toward signing any needed location

If the customer has merchants that they would like to be part of the WEX accepting network who do not already have direct acceptance or cannot utilize the WEX*Pay™* tool, we will request the following information from the fleet:

- Merchant name
- Merchant address
- Merchant contact person
- Phone and fax numbers
- Expected utilization/volume from your fleet
- Name and phone number of fleet employee requesting WEX card acceptance

WEX will work with all interested parties toward gaining acceptance at the location. This includes either direct agreements or acceptance through our partnerships with network sales organizations and acquirers.

Number of WEX-accepting **locations, July 2019:**

Fuel, United States	137,862
Fuel, Canada	~ 4,500
EV (US)	~ 66,000
WEXPay (US)	~ 398,000

Staff Report: 109-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
Interstate Bridge Replacement Intergovernmental Agreement Amendment

Key Points

- In 2019, the states of Oregon and Washington approved funding to restart work on replacing the Interstate 5 bridge across the Columbia River and directed Oregon Department of Transportation (ODOT) and Washington State Department of Transportation (WSDOT) to open a bi-state program office to lead this work.
- The City of Vancouver (City) is one of eight local agencies partnering with WSDOT and ODOT on the Interstate Bridge Replacement (IBR) Program. Staff has been and will continue to coordinate with the Program team on IBR work related to planning, environmental review, design, and public affairs.
- On September 27, 2021, Council voted in support of the City Manager executing an Intergovernmental Agreement (IGA) outlining the City's commitments and responsibilities related to the work noted in the previous bullet for purposes of reimbursement by the IBR Program. That IGA was executed on October 1, 2021, and has since been amended twice to extend the term.
- The attached Agreement amends the IGA and includes a Scope of Work and associated Budget for activities to be reimbursed from July 1, 2026, to June 30, 2027.

Strategic Plan Alignment
Transportation and Mobility – a safe, future-ready and convenient transportation system

Present Situation

IBR Program partners agreed to a Modified Locally Preferred Alternative (MLPA) in summer 2022. Since then, City staff have been coordinating with the Program on conceptual design of the multimodal elements included in the MLPA, the environmental preview process in accordance with the National Environmental Policy Act (NEPA), and related work to plan for construction and operational phases. The Final Supplemental Environmental Impact Statement (FSEIS) for the IBR Program was published in April 2026. Issuance of the Record of Decision by the federal lead agencies later in 2026 will enable the Program to move into construction. City staff will continue to participate in program management, public affairs, environmental review and permitting, design, and utilities. These tasks are further defined in Attachment A, Exhibit D.

Advantage(s)
This Agreement sets forth the terms and conditions for the City to receive reimbursement for participation in the IBR Program as defined in Attachment A, Exhibit D, Scope of Work and Budget.

Challenge(s)
None

Budget Impact

This Agreement will provide financial support through the Washington Department of Transportation for the City's capacity to participate in the IBR Program. The budget for this agreement will be appropriated in the Biennial Budget process.

Prior Council Review

- May 7, 2018: WSDOT updated Council on the I-5 Bridge Planning Inventory
- July 16, 2018: Staff Update, current conditions and efforts to restart bridge replacement process
- August 6, 2018: Staff update, Council review and adoption of a resolution in support of replacement bridge with high-capacity transit in a dedicated guideway
- June 8, 2020: Staff update on IBR Program work program
- June 21 and July 12, 2021: Council discussion on a resolution to define the City's desired outcomes through the IBR Program
- July 26, 2021: Council review and adoption of resolution to define the City's desired outcomes through IBR Program
- September 27, 2021: Council authorization for the City Manager to execute Intergovernmental Agreement with WSDOT
- July 11, 2022: Council approval of a resolution supporting the MLPA, Program Commitments, and City of Vancouver Conditions of Approval – following two workshops in June 2022
- December 19, 2022: Council authorization for the City Manager to execute an amendment to the Intergovernmental Agreement with WSDOT for City participation in the IBR Program
- July 17, 2023: Council authorization for the City Manager to execute a professional services agreement for IBR Program consultant support
- April 14, 2026: Council approval of a resolution related to IBR's extension of Light Rail Transit to Vancouver
- 2021 – Present: Numerous updates via Council Communications and briefings on Executive Steering Group meetings and overall Program status

Action Requested
On Monday, June 1, 2026, authorize the City Manager, or designee, to execute Amendment No. 3 to contract GCB 3544 between the City of Vancouver and Washington State Department of Transportation. Extend the termination date to June 30, 2027.

Staff Contact
Katherine Kelly, Program and Policy Development Manager, katherine.kelly@cityofvancouver.us

Attachments:
1. Special Transportation Planning Study Agreement

Attachment A

Special Transportation Planning Study Agreement
GCB 3544 Amendment No. 3

This is Amendment No. 3 between the Washington State Department of Transportation, hereinafter the "WSDOT," and The City of Vancouver, hereinafter the "Planning Agency" or "CITY", collectively referred to as the "Parties" and individually the "Party".

WHEREAS, the Parties entered into Agreement GCB 3544 on October 4, 2021, hereinafter "Agreement", Amendment No. 1 on December 29, 2022, and Amendment No. 2 on June 16, 2025; and

WHEREAS, the provisions of Section 5.1, allow for changes to the Agreement, provided they are mutually agreed upon by the Parties in writing; and

WHEREAS, the Parties agree to modify the Agreement provisions for the continued work required for the Project.

NOW THEREFORE, pursuant to above recitals, and in consideration of the terms, conditions, covenants, and performances contained herein, or attached and incorporated and made a part hereof it is mutually agreed as follows:

The Parties agree to amend the Agreement, in accordance with Section 5 Modifications to:

a. modify sections 2.1 and 3.1
b. replace Exhibit B, Title 6, Civil Rights Act of 1964
c. add Exhibit D Scope of Work and Budget for the next phase of the Project

as follows:

1. The following, which reads:

2.1 The Project period shall commence upon execution of this Agreement and shall expire on June 30, 2026.

3.1 WSDOT agrees to reimburse the Planning Agency's actual direct and related indirect costs allocated per 2 CFR 200 Appendix VII (F) (3). The maximum amount that WSDOT shall reimburse the Planning Agency shall not exceed the "Total Amount Authorized", as indicated in Exhibit A for January 1, 2021 through December 31, 2022 and in Exhibit C for January 1, 2023 through June 30, 2026.

shall be deleted in its entirety and replaced with:

2.1 The Project period shall commence upon execution of this Agreement and shall expire on June 30, 2027.

3.1 WSDOT agrees to reimburse the Planning Agency's actual direct and related indirect costs allocated per 2 CFR 200 Appendix VII (F) (3). The maximum amount that WSDOT shall reimburse the Planning Agency shall not exceed the "Total Amount Authorized", as

indicated in Exhibit A for January 1, 2021 through December 31, 2022; Exhibit C for January 1, 2023 through June 30, 2026; and Exhibit D for July 1, 2026 through June 30, 2027.

2. Exhibit B, Title 6, Civil Rights Act of 1964 is hereby deleted and replaced in its entirety as attached hereto by this reference.

3. Exhibit D Scope of Work and Budget for July 1, 2026 through June 30, 2027 is hereby attached and incorporated by this reference.

4. All other terms and conditions of the Agreement, shall remain in full force and effect, except as modified by this Amendment No. 3.

This Amendment may be executed in counterparts or in duplicate originals. Each counterpart or each duplicate shall be deemed an original copy of this Agreement signed by each party, for all purposes. Electronic signatures or signatures transmitted via e-mail in a "PDF" may be used in place of original signatures on this Agreement. Each party intends to be bound by its electronic or "PDF" signature on this Agreement and is aware that the other parties are relying on its electronic or "PDF" signature.

IN WITNESS WHEREOF, the parties hereto have executed this Amendment No. 3 as of the party's date last signed below.

The City of Vancouver	**Washington State Department of Transportation**
By:	By:
Printed: Lon Pluckhahn	Printed: Frank Green
Title: City Manager	Title: Assistant Program Administrator
Date:	Date:
Approved as to Form (if needed)	**Approved as to Form Washington State Department of Transportation**
By:	By: *(not required)*
Printed: Nena Cook	Printed:
Title: City Attorney	Title: WSDOT Assistant Attorney General
Date:	Date:

EXHIBIT B
TITLE 6, CIVIL RIGHTS ACT OF 1964

During the performance of this Agreement, the Planning Agency, for itself, its subcontractors, its assignees, and successors in interest, hereinafter referred to as the "consultant," agrees as follows:

1. Compliance With Regulations: The consultant (hereafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the ***Federal Highway Administration (FHWA)***, as they may be amended from time to time, which are herein incorporated by reference and made a part of this Agreement.

2. Nondiscrimination: The consultant, with regard to the work performed by it during the Agreement, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The consultant will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.

3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment: In all solicitations either by competitive bidding or negotiation made by the consultant for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the consultant of the consultant's obligations under this Agreement and the Acts and the Regulations relative to Nondiscrimination on the grounds of race, color, or national origin.

4. Information and Reports: The consultant will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by WSDOT, ODOT, the Oregon Secretary of State's Office, the FHWA , Federal Transit Administration, or the Comptroller General of the United States, and their duly authorized representatives to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a consultant is in the exclusive possession of another who fails or refuses to furnish this information, the consultant will so certify to WSDOT or the FHWA as appropriate, and shall set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance: In the event of the consultant's noncompliance with the Nondiscrimination provisions of this Agreement, WSDOT will impose such Agreement sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
    a. withholding of payment to the consultant under the Agreement until the consultant complies; and/or
    b. cancelling, terminating, or suspending an Agreement, in whole or in part.

6. Incorporation of Provisions: The consultant will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The consultant will take such action with respect to any subcontract or procurements as WSDOT or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the consultant becomes involved in, or is threatened with litigation with a subcontractor, or supplier because of such direction, the consultant may request the United States to enter into litigation to protect the interest of the United States.

EXHIBIT D: SCOPE OF WORK (SOW) AND BUDGET

DURATION: JULY 1, 2026 THROUGH JUNE 30, 2027

INTRODUCTION/PURPOSE

This Scope of Work (SOW) includes the agreed-upon services and budget that the Washington State Department of Transportation (WSDOT) will reimburse the City of Vancouver (CITY) for as it pertains to the I-5 Interstate Bridge Replacement (IBR) Program (the "Program"). This SOW covers general coordination and services for the time period beginning July 1, 2026 through June 30, 2027.

WORK ELEMENTS FOR WHICH THE CITY WILL BE REIMBURSED

TASK 1: PROGRAM MANAGEMENT AND CONTROLS

The CITY shall provide agreement management and administration functions including invoicing, reporting, and developing future IBR-related agreements as follows:

a. Provide a single point of contact (CITY Program Lead) to manage staff resources needed for the completion of services and deliverables described in this SOW, including:
    i. Coordinating and managing work under this SOW including deliverables, schedule, staff assignments.
    ii. Coordinating with Program disciplines on issues that may affect scope, schedule or budget.
    iii. Compiling consolidated comments for individual tasks when review comments are made by more than one reviewer and submitting the comments to WSDOT.
    iv. Preparing for and participating in Program coordination meetings, as needed for Program coordination.
b. Prepare and submit invoices and progress reports to WSDOT for reimbursement no more frequently than monthly and no less frequently than quarterly.
c. Work with Program to develop future agreement(s) for CITY services as needed and requested by WSDOT to assist Program-related design and construction packages, including:
    i. Coordinating with WSDOT to develop a mutually agreed-upon schedule for development of agreements.
    ii. Preparing for and participating in agreement coordination meetings as needed for Program coordination.

Key Staff:

- CITY Program Lead (Policy & Programs Manager)
- Additional staff as needed and agreed to within budget

Assumptions:

- For the purposes of cost estimating, this assumes approximately 12 Program coordination meetings with up to four CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.
- For the purposes of cost estimating, this assumes approximately 18 agreement-related meetings with up to four CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.

TASK 2: PUBLIC AFFAIRS

The Program's Public Affairs team will lead strategic public affairs efforts to advance Program needs, including proactive and reactive communications, community engagement, and government relations efforts. To assist with this task, the CITY shall:

a. Prepare for and participate in Program advisory group meetings as needed for Program coordination.
b. Prepare for and participate in staff level workshops or coordination meetings on topics such as community engagement, community benefits, Program schedule and sequencing as needed for Program coordination.
c. Coordinate with the Program's Public Affairs team to align messaging, strategy, and methods as it relates to communications, community engagement, and government relations efforts.
d. Lead communications with internal agency boards, councils, and committees, including preparing presentations and materials as needed.
e. Share Program communications with the public through the CITY's existing communications channels as needed for Program coordination.
f. Submit all materials to WSDOT for review in coordination with the Program's Public Affairs team prior to presenting or disseminating information to the public, including but not limited to boards, councils, and committees.
g. Provide assistance and staffing for public meetings, community engagement activities, and government relations, as needed.
h. Assist Program staff with federal or state policy efforts and engagement with federal, state, and local representatives, as needed.
i. Prepare internally for Program-related meetings, as applicable.

Key Staff:

- CITY Program Lead
- Additional staff as needed and agreed to within budget

Assumptions:

- For purposes of cost estimating, this assumes approximately five advisory group meetings with up to two CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.
- For purposes of cost estimating, this assumes approximately 12 workshops or coordination meetings with up to two CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.

TASK 3: ENVIRONMENTAL/PERMITTING

To assist with this task, the CITY shall:

a. Review updated environmental documentation for the Program, which may include, but not be limited to the following regulations:
   i. National Environmental Policy Act (NEPA)
   ii. State Environmental Policy Act (SEPA)
   iii. Section 106 National Historic Preservation Act.

b. Coordinate with the Program to address issues related to the environmental documentation.

c. Provide documentation as needed to assist in environmental compliance and permitting coordination and review.

d. Compile consolidated comments to submit to WSDOT into a single document when review comments are provided by more than one reviewer.

e. Coordinate with Program discipline teams to identify the anticipated CITY permits and approvals necessary for the Program's design and construction packages. CITY activities include participating in the development and review of permitting plans, providing guidance on permitting processes, and assistance with preliminary applications for the Program's design and construction packages which may include, but are not limited to:
   i. Pre-Completion Tolling Signage
   ii. Other Program design and construction packages, as needed

f. Prepare for and participate in applicable Program-related meetings as it pertains to environmental review and/or permitting, or task-related meetings as needed for Program Coordination.

Key Staff:

- CITY Program Lead
- Additional staff as needed and agreed to within budget

Assumptions:

- For the purposes of cost estimating, this assumes approximately two meetings per month with up to four CITY staff to discuss environmental compliance issues. Meeting frequency and CITY staff participation is subject to change based on Program needs.
- For the purposes of cost estimating, this assumes approximately five additional task-related meetings with up to 12 CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.

TASK 4: DESIGN COORDINATION

WSDOT will work in close cooperation with the CITY on design plans and specifications for Program elements that may involve CITY-owned or operated facilities, the CITY's regulatory jurisdiction, CITY-provided services, and other elements affecting the CITY. To assist with this task, the CITY shall:

a. Review engineering plans (from conceptual through final design) and design-related technical reports for Program-proposed improvements and coordinate with Program to advance designs and address issues, as needed. Design coordination topics may include but are not limited to:
    i. Construction phasing plans, in consideration of other citywide construction project schedules that may affect the Program.
    ii. Design criteria for roadways, facilities, and cross-sectional elements.
    iii. CITY streets, access locations and access control, and pre- and post-construction property boundaries.
    iv. Traffic analysis, transit facilities, transit maintenance and operations, safety analysis, traffic signals, illumination, work zone traffic management, emergency services management, and construction staging concepts.
    v. Hydraulics reports, drainage and stormwater design, and roadside restoration.
b. Prepare for and participate in Program coordination meetings for all Task 4 activities, as needed for Program coordination.
c. Compile consolidated comments to submit to WSDOT into a single document when review comments are provided by more than one reviewer.
d. Provide design-related documentation to WSDOT, as needed.

Key Staff:

- CITY Program Lead
- Public Works Streets and Transportation Manager

- Additional staff as needed and agreed to within budget

Assumptions:

- For the purposes of cost estimating, this assumes approximately 12 coordination meetings with up to 12 CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.

TASK 5: UTILITIES COORDINATION

To assist with this task, the CITY shall:

a. Provide information to WSDOT, as requested, on existing and planned CITY-owned utility systems and any known private utilities located within existing CITY right-of-way that could be affected by design and construction packages that are part of the Program.
b. Assist WSDOT with identifying potential utility conflicts with Program design and construction packages located within existing and proposed CITY right-of-way. This may include reviewing utility information, identifying and confirming potential utility conflicts, confirming or providing the mode of occupation or accommodation for utilities, and providing supplemental utility information as needed.
c. Provide review and approval of CITY-owned utility relocation concepts.
d. Prepare for and participate in Program utilities coordination meetings as needed for Program coordination.
e. Compile consolidated comments to submit to WSDOT into a single document when review comments are provided by more than one reviewer.

Key Staff:

- CITY Program Lead
- Public Works - Utilities Engineering Manager
- Additional staff as needed and agreed to within budget

Assumptions:

- For the purposes of cost estimating, this assumes approximately six coordination meetings with up to 10 CITY staff. Meeting frequency and CITY staff participation is subject to change based on Program needs.

Attachment A

BUDGET

Task	Description	July 1, 2026 to June 30, 2027 Not to Exceed
1	Program Management and Controls	$109,330.44
2	Public Affairs	$91,542.90
3	Environmental/Permitting	$479,299.22
4	Design Coordination	$298,612.74
5	Utilities Coordination	$118,317.90
DE	Direct Expense	$0.00
	Total Amount Authorized:	**$1,097,103.20**

CITY OF Vancouver WASHINGTON

Staff Report: 110-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
Vancouver Police Command Guild Collective Bargaining Agreement 2026-2028

Key Points

- Three-year collective bargaining agreement effective January 1, 2026, to December 31, 2028.
- Monetary elements agreed to include pay increases for 2026-2028, an increase in deferred compensation contribution, an increase in salary pay differential, an education incentive, establishment of a Voluntary Employees' Beneficiary Association (VEBA), which is a savings vehicle to cover medical expenses, and an additional tier for longevity pay at 25 years.
- Updates to bring the contract into compliance with state wage and hour laws.
- Increase in management flexibility that clarifies the qualifying criteria to determine how Callback Pay is paid out and tracked for operational purposes.

Strategic Plan Alignment
Safe and Prepared Community – a safe place to live, work, learn and play

High Performing Government – a government that is reliable, fiscally responsible, equitable, and open to compromise

Present Situation
The labor agreement between the City of Vancouver and the Vancouver Command Guild (VCG) bargaining unit expired on December 31, 2025. The parties were able to work through a collaborative process and consensual decision-making on many of the provisions for a new three-year agreement. The new labor agreement was recently ratified by VCG members and is now being brought to the Council for approval.

Advantage(s)
If ratified, the City and bargaining unit will have a collective bargaining agreement and will be operating under an agreement that meets the business and community needs of both parties.

Challenge(s)
There are no known challenges in ratifying this agreement.

Budget Impact
The total cost of the contract was determined by the 15.53% agreed to in the Vancouver Police Guild contract. The Command Guild has "me too" language that results in that unit receiving essentially the same package. The Command Guild contract also includes an additional 2% authorized by Council to address wage compression.. The .53% was the cost of settling an outstanding grievance regarding changes to medical benefits.

Prior Council Review
None

Action Requested
On Monday, June 1, 2026, authorize the City Manager, or designee, to sign the collective bargaining agreement with the Vancouver Police Command Guild for 2026-2028.

Staff Contact
Antoinette Gasbarre, Human Resources Director, Robert Prociak, People and Labor Strategy Manager, Antoinette.Gasbarre@cityofvancouver.us, Rob.Prociak@cityofvancouver.us

Attachments:
1. 2026-2028 Collective Bargaining Agreement - Clean
2. 2026-2028 Collective Bargaining Agreement - Track Changes

AGREEMENT

By and Between

City of Vancouver

and

VANCOUVER COMMAND GUILD

January 1, 2026 – December 31, 2028

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VANCOUVER COMMAND GUILD

AGREEMENT

This Agreement, as of the date indicated herein, by and between the City of Vancouver, a municipal corporation of the State of Washington, and hereinafter referred to as the "Employer," and the Vancouver Command Guild, hereinafter referred to as the "Guild," WITNESS that WHEREAS the parties have negotiated the terms and conditions of a collective bargaining agreement, hereinafter referred to as the agreement, relating to permanent, full-time Police Lieutenants and Police Commanders, hereinafter referred to as employees, represented by the Guild and described in this agreement, as to wages, hours, and other terms and conditions of employment of such employees and wish to reduce the agreement to writing, agree hereto as follows:

ARTICLE 1. Guild Recognition

1.1 The Employer recognizes the Guild as the exclusive bargaining agent for all of its employees covered by this Agreement.

1.2 The Employer and the Guild agree that questions of Guild representation that may arise shall be resolved in accordance with the rules of the Washington State Public Employment Relations Commission and in accordance with local, state, or national statutes and rules.

ARTICLE 2. Nondiscrimination

2.1 The parties agree that the provisions of this Agreement shall be applied equally to all employees covered hereby without regard to race, color, national origin, sex, age, physical or mental disability, political or religious opinions, labor organization affiliation, sexual orientation, gender identity, pregnancy, marital status, military status, or membership in any other class protected by state or federal law or City ordinance, unless such would prohibit performance of a qualifications standard that is job related and consistent with business necessity or necessary to prevent a direct threat to health and safety.

2.2 All references to members or employees in this Agreement designate both sexes; wherever the male gender is used it shall be construed to include both male and female members or employees as appropriate.

2.3 Employees shall process discrimination, retaliation, and/or bullying complaints under the applicable City Equal Employment Opportunity or HR/Department policy and procedure or under existing state or federal

law, and shall not have recourse through the grievance procedures established in Article 23 of this Agreement.

ARTICLE 3. Rights of Management

3.1 The management of the municipal corporation, including but not limited to, the organization, scheduling, staffing, and direction of the work force, is vested exclusively in the Employer, subject to the terms of this Agreement.

Examples of management rights include, but are not limited to:

3.1.1 to determine the number of employees to be employed;
3.1.2 to hire employees, determine their qualifications and assign and direct their work;
3.1.3 to evaluate employee performances;
3.1.4 to set the standards of productivity, and the services to be provided;
3.1.5 to control and regulate the use of facilities, equipment, and other property of the Employer;
3.1.6 to determine the number, location and operation of departments, divisions, and all other units of the Employer.

The Employer has the right to introduce any and all new improved and automated methods or equipment to improve efficiency and to reduce costs and assign employees within the bargaining unit in accordance with such improvements and cost reduction methods. All matters not specifically and expressly covered or treated by the language of this Agreement may be administered for its duration by the Employer in accordance with such policies or procedures as the Employer, from time to time, may determine. This Article recognizes an employee's right to use the grievance procedure set forth in Article 23 of this Agreement.

Nothing in this Article shall be considered a waiver of the Guild’s right to bargain over mandatory subjects of bargaining pursuant to RCW 41.56.

3.2 *Department Rules and Regulations*

It is mutually agreed that the City has full responsibility and authority to adopt rules and regulations for the operation of the Police Department and the conduct of its employees, and the Guild agrees that its members shall comply in full with such rules and regulations. Nothing in this Section shall be interpreted to restrict the Chief's right to make decisions or to establish procedures consistent with the "emergency" nature of operating the department.

ARTICLE 4. Employee Rights

4.1 The Employer recognizes and agrees that employees of the Police Department covered by this Agreement are entitled to all rights and privileges accorded ordinary citizens under all applicable provisions of the United States and State Constitutions as well as the rights and privileges granted by any and all applicable legislation and the common law.

ARTICLE 5. Union Security, Dues and Other Associated Dues

5.1 The parties agree that the terms of this Agreement apply equally to all employees in the bargaining unit and as defined in the Preamble to this Agreement. Any bargaining unit employee may authorize the Employer to deduct from their pay the amount of Guild membership dues charged by the Guild for representation and services provided by the Guild by providing notice to the Guild.

Any bargaining unit employee who does not want to be a member of the Guild, but who nonetheless wants to pay for services provided by the Guild has the voluntary option to pay fair share fees in an amount equal to membership dues. Any member of the bargaining unit may authorize the Employer to deduct from their pay voluntarily fair share fees in an amount equal to Guild dues charged by the Guild by providing notice to the Guild.

The employee's authorization will remain in effect until expressly revoked by the employee by notice to the Guild in accordance with the terms and conditions of the authorization. The Employer will rely on information provided by the Guild regarding the authorization and revocation of deductions.

5.2 Upon receipt of an employee request for authorization or revocation of authorization, the Employer shall notify the Guild as soon as possible via email, but no more than five (5) working days of the notification. The Employer will take no action upon receiving an employee request until receiving confirmation from the Union to begin or end deductions.

5.3 The Employer agrees to notify the Guild president when a represented position is filled within thirty days from the date of employment.

5.4 The Guild, upon completion of the employee orientation, shall provide the Employer notification as to whether such employees authorized dues deduction, fair share fees, or declined to pay dues. The Employer will deduct such dues/voluntary fair share fees from the wages of those employees and forward them to the Guild each month.

5.5 The Guild shall indemnify, defend and hold harmless the Employer and its officials, representatives and agents against any and all claims, demands, suits, or other forms of liability (monetary or otherwise) and for all reasonable legal costs that shall arise out of or by reason of action taken or not taken in good faith by the Employer in complying with the provisions of this Article. If an improper deduction is made, the Guild shall refund directly to the employee any such amount.

ARTICLE 6. Guild Representatives and Activities

6.1 The Guild shall inform the Employer in writing of the names of its current executive board members and attorneys who are designated to represent it. This information shall be kept up-to-date at all times. Only persons so designated will be accepted by the Employer as representatives of the Guild during the grievance process and on bargaining issues. The Guild may designate other members as representatives during contract negotiations.

6.2 The Guild's officers and attorneys shall have reasonable access to the Department during working hours, providing they do not interfere with or cause employees to neglect their work.

6.3 Employees and attorneys visiting the premises shall not engage in organizing or campaigning for the Guild, but this paragraph will not prevent the Guild from discussing in non-work areas during non-work periods matters of Guild membership, fees, dues, or Guild business with employees covered by this Agreement.

6.4 The Employer agrees not to discriminate against any member of the Guild because of their activity on behalf of or their membership in the Guild, provided such activity is not carried on during working hours, except as expressly provided in this Agreement.

6.5 Within the first 90 days of the employee's start date, the Employer agrees to allow the Guild thirty (30) minutes during the employee's regular working hours to provide new members information about the Guild.

6.6 The Employer agrees to allow leave with pay for employee members of the Guild for no more than twelve (12) work-shifts (96 hours) per year total, for conducting business vital to the Guild. The leave will be scheduled in advance based on vacation scheduling guidelines. Time away from their work assignment to act in the role of Guild

representative shall be coded as “Union Leave” in the Department’s payroll system.

6.7 Employees on the Guild bargaining committee (not Guild leave) who are already scheduled to work during times scheduled for negotiating a new Collective Bargaining Agreement will be allowed to attend those negotiations as employer paid work time. The Employer will not make special provisions to arrange shifts to maximize on duty participation in negotiations.

6.8 Employees designated as Guild representatives will be permitted to use work time for the investigation of grievances and representation of employees with grievances when appropriate.

ARTICLE 7. Strikes, Work Stoppages or Work Slowdowns

7.1 The Employer and the Guild recognize that the public interest requires the efficient and uninterrupted performance of all city services, and to this end pledge their best efforts to avoid or eliminate any conduct contrary to their overall objective. During the term of this Agreement, neither the Guild nor the Employer shall cause, engage in, or sanction any work stoppage, strike, slowdown, lockout or other interference with City functions. Employees who engage in any of the foregoing actions may be subject to immediate disciplinary action, including discharge, and the Guild may be subject to action in accordance with RCW 41.56.

ARTICLE 8. Identification of Jobs

8.1 "Job" shall be defined as the employee's job title (classification), position number, and pay range assigned by the Employer.

8.2 When work operations involving new or substantially changed requirements are established after the effective date of this Agreement and such requirements are not adequately or specifically described in an existing job, the Employer will describe and establish a new job in an appropriate range subject to the Employer's duty to bargain with the Guild concerning appropriate compensation for the new job, if agreed to be within the bargaining unit.

ARTICLE 9. Job Vacancies/Probationary Period

9.1 All vacancies will be filled in accordance with the established rules and regulations of the Vancouver Civil Service Commission; and all applicable State and Federal laws.

9.2 Employees promoted to the position of Lieutenant or Commander shall serve a twelve (12) month probationary period during which time the Employer may decide to return the employee to the employee's former classification. Demotion during the promotional probationary period is not subject to grievance under this Agreement.

9.3 Employees hired (not promoted) into the position of Commander shall serve a twelve (12) month probationary period during which time the Employer may terminate the employee. Termination or discipline of a probationary employee is not subject to grievance under this Agreement.

9.4 For any time-off an employee takes in excess of thirty (30) consecutive calendar days during the twelve (12) month probationary period for which the employee is unable to be meaningfully evaluated in their position, the Employer may extend the probation period by a time equal to the period lacking meaningful evaluation. Such probationary extension periods will not result in the employee losing scheduled step increases.

ARTICLE 10. Layoff and Recall

10.1 Layoff and recall shall be in accordance with the established rules and regulations of the Vancouver Civil Service Commission, with the following exceptions:

A. In the event of a layoff, employees will be laid off in the order of their seniority. Seniority shall be defined as time in rank.

B. At the time of any layoff, lieutenants and commanders may be given an opportunity to accept a reduction to the next lower rank in lieu of layoff. Such employees shall have bumping rights over the employee in the next lower rank with the least seniority. Seniority shall be defined as time in the rank plus time in any higher rank.

C. Employees laid off or demoted in lieu of layoff shall be placed on a reinstatement list for the rank from which the layoff took place.

D. Employees who accept a reduction in lieu of layoff shall remain on the reinstatement list indefinitely. Laid off employees shall remain on the reinstatement list for a maximum of twenty-four (24) months.

E. Laid off employees who are offered reinstatement shall receive a conditional offer. The offer will be conditioned on the successful completion of the following:

1. A background investigation and polygraph. The investigation and polygraph will be limited to the period of time between the date of layoff and date of proposed reinstatement.
   i. Should the polygraph come back inconclusive, the employee will be given an option for a 2nd polygraph with a different polygraph examiner at the City's expense.
   ii. Should the 2nd polygraph also be inconclusive, the laid off employee's eligibility for reinstatement will end.

2. A medical examination and psychological evaluation.

3. A drug screen.

F. An individual will lose rights to reinstatement and/or be removed from the reinstatement list if they commit an act that would be cause for termination of employment of if they lose their commission as a general authority law enforcement officer.

G. Appointments from the reinstatement list shall be made in the order of length of service in that specific rank. The employee on the reinstatement list who has the most time in rank shall be reinstated first.

1. For employees on the reinstatement list for the position of Lieutenant, "length of service" and "time in rank" shall be defined as time employed as a Lieutenant for the Vancouver Police Department.

2. For employees on the reinstatement list for the position of Commander, "length of service" and "time in rank" shall be defined as time employed as a Commander for the Vancouver Police Department.

ARTICLE 11. Work Week, Hours of Work, Shifts

11.1 *Work Week:*

A. Recognizing that flexibility is required in the scheduling of assignments for command personnel, the normal work week shall be the equivalent of forty (40) hours per week with normal assigned work schedules as follows:

A five (5) day work schedule Monday through Friday beginning between 7:00 a.m. and 9:00 a.m., or

A mutually agreed upon 9/80 schedule, working 80 hours over two work weeks, with eight (8) nine (9) hour days, one (1) eight (8) hour day, and one (1) day off. Employees will work Monday through Friday, beginning between 7:00am and 9:00am, or

A mutually agreed upon four (4) day schedule not to exceed ten (10) hours per day, or

A Night Patrol Lieutenant who shall be scheduled to work, as determined by the Chief or their designee, four (4) days per week, ten (10) hours per day plus a thirty (30) minute unpaid lunch; or the patrol schedule, a 5/4, 5/4, 5/5 (10.5 per day with a thirty (30) minute paid lunch. The normal working hours shall overlap with Graveyard shift for a period of at least two (2) hours.

B. In all cases, the required work hours shall be posted in the position announcement, before the assignment is made.

C. The Police Chief and Assistant Chief(s) retain the management right to:
   a. modify normal work schedules in emergency circumstances;
   b. for job performance related reasons;
   c. for training purposes; or
   d. for short term operational needs.

D. On mutual agreement of the employees involved and the employer, the normal assigned work week and/or hours of work may be adjusted for temporary assignments of up to ninety (90) days when consistent with the operational needs of the department. Assignments of longer than ninety (90) days shall be a mandatory subject of bargaining.

11.2 *Modification of Normal Work Schedules.*

The parties agree to consider modifications to the normal work schedule for employees when there is a demonstrated need. Such changes shall not be precedent setting. If such modified work schedules are approved by the Police Chief or Assistant Chief and the employee, the Guild agrees to allow members of the bargaining unit to work mutually agreed schedules.

11.3 *Shift Exchanges*

A. Each member of the Police Department covered under this Agreement may be allowed to exchange shifts with other members when the change is not detrimental to the best interests of the Police Department as determined by and subject to the approval of the Police Chief or Assistant Chief.

11.4 Wellness

A. On-duty wellness time is administered in accordance with Department policy.

ARTICLE 12. Rates of Pay

12.1 The hourly rate of an employee on a forty (40) hour work week will be the monthly base rate multiplied by twelve months and divided by two thousand eighty (2080) hours. This rate multiplied by eight (8) hours will be the daily base rate; multiplied by forty (40) hours will be the weekly base rate; and multiplied by one hundred seventy-three and three tenths (173.3) hours will be the monthly base rate.

12.2 Rates of pay will be as set forth in Appendix “A” to this Agreement.

Effective January 1, 2026

Salary schedules for Lieutenants and Commanders will be adjusted by seven percent (7%).

Effective January 1, 2027

Salary schedules for Lieutenants and Commanders will be adjusted by three percent (3%).

Effective January 1, 2028

Salary schedules for Lieutenants and Commanders will be adjusted by three percent (3%).

A. **Lieutenant.** The base wage for top step Lieutenant shall be not less than nineteen and seven-tenths percent (19.7%) above top step Sergeant.
   a. The nineteen and seven-tenths percent (19.7%) includes: :
      i. Seventeen percent (17%) differential)
      ii. Two and seven- tenths percent (2.7%) in lieu of holiday pay.
         1. 17+2.7 = 19.7%

B. **Commander.** The base wage for top step Commander shall not be less than 10% above top step Lieutenant.

C. **Education.** Education is provided in Article 22 and removed from the differential.

12.3 The night lieutenant shall receive a shift differential of fifty cents ($.50) per hour for each hour worked. Shift differential premium pay shall be included in vacation pay based on specific shift assignment.

12.4 *Overtime*

A. As executive management level employees, Commanders and Lieutenants are accountable for personal time management. Each employee shall determine when it is appropriate to flex work hours, use accrued PDO or sick leave hours, and/or to request overtime pay or compensatory time off. Requests for overtime pay must be for work related performance of employees' duties or projects assigned by VPD.

B. Each employee is personally responsible for assuring that the employee's personal work hours, overtime hours, compensatory time and paid leave time are accurately documented in the City's time and payroll records.

C. In the event the need for overtime should arise in the police department, the employee working overtime shall be paid at one and one-half times the employee's hourly rate of pay.

D. Employees are eligible for overtime pay for all hours worked beyond forty (40) compensable hours in the established seven (7)

day work week. The established work week is seven consecutive work days beginning at 12:01 a.m. Sunday and ending at midnight on Saturday.

E. Compensatory Time. By mutual agreement of the employer and employee, employees may accrue compensatory time off in lieu of overtime compensation. Compensatory time off shall be accumulated at the same rate as overtime compensation would have otherwise been paid. Employees may not accumulate compensatory time off in excess of ninety (90) hours.

12.5 *Callback Pay*

Callback pay shall be paid at the rate of double the regular rate of pay when the Police Chief or Assistant Chief requires that the employee work under the following circumstances. For the purposes of this section, work includes receiving command notifications.

A. On a day already worked or to be worked: If the employee has completed their regular shift, is on the way home, or at home and is required to work other than an extension at the beginning or end of their shift.

B. On days of rest: If not scheduled before 11:00 p.m. the day before the proposed work, or before the end of the last shift worked before the proposed work, whichever is later.

C. Callback shall be paid for a minimum of one and one half hours, or actual hours worked if the amount of time exceeds one and one half hours, when the employee is required to physically respond to work. The one and one half hours of minimum callback pay begins at the time of the call, text, or email originating the physical callback.

D. Employees who receive a call, text, or email for a substantive, work-related issue, but do not physically respond to work as a result, will be compensated for the cumulative minute-by-minute basis for all calls/texts/emails between shifts at the rate of double the regular rate of pay rounded up to the nearest quarter hour, for a minimum of one hour (1.0 hour). The foregoing shall not apply to de minimis calls/texts/emails, lasting less than five (5) cumulative minutes, calls/texts/emails for emergency call back, or calls/texts/emails for overtime availability. If an employee receives off-duty calls/texts/emails and is then subsequently physically

called back to work as a result of such calls/texts/emails, the employee shall receive compensation beginning from the first calls/texts/email, as set forth in the paragraph above.

12.6 *Court Appearances*

A. Court appearances during off-duty hours of a scheduled day of work will be compensated at the rate of one and one-half times base rate for a minimum payment for three (3) hours.

12.7 *Step Increases*

Step increases will be made effective on the adjusted salary review date of the employee's promotion. For example, if an employee is hired between the first (1st) and the fifteenth (15th) of the month, the pay adjustment would be on the first (1st) day of the current month. If an employee is hired between the sixteenth (16th) and the end of the month, the adjustment would be on the first (1st) day of the following month.

12.8 *Retention Pay*

For the purposes of this article, years of service will be defined as years of continuous service with the Vancouver Police Department.

Years of service	Percentage of base pay
7+ to 10 years of service	2%
10+ to 15 years of service	4%
15+ to 20 years of service	6%
20+ to 25 years of service	8%
25+ years of service	10%

ARTICLE 13. Leave Benefits

13.1 Each employee shall be granted paid days off to be used during the year for vacation, illness, holidays, or personal business time off. Bereavement leave shall be separate and as specified in Section 13.7 of this Article. Paid Days Off (PDO) are accrued in accordance with the following schedule:

PAID DAYS OFF (PDO) ACCRUAL SCHEDULE

During Years of Service	Accrual Rate Per Month (Hours)	Maximum Accrual (Hours)
0 to 1	14.00	336
1+ to 5	19.50	468
5+ to 8	20.50	492
8+ to 12	21.50	516
12+ to 15	22.50	540
15+ to 20	25.50	612
20+	27.50	660

13.2 Employees may begin using accrued PDO hours as soon as they become available in their bank. PDO hours accrued in a pay period cannot be used in the same pay period in which they are earned, i.e. PDO hours accrued in the 1st through the 15th pay period cannot be used until the 16th through the end of the month pay period and so forth.

13.3 Employees must schedule and take at least ten (10) shifts of vacation (PDO's) each calendar year. Upon termination of employment, an employee shall be paid for all earned and accrued paid days off at the employee's rate of pay.

13.4 Eligible employees may sell back up to sixty (60) accrued and unused PDO hours during each calendar year. “Eligible employees” include those

employees who are able to comply with Section 13.3 of this Article **after** selling back PDO hours.

13.5 Upon separation from employment, employees may upon their choosing have all or a portion of their vacation (PDO) and/or compensatory time hours accrued deducted before taxes, and paid into one (1) of the following tax deferred vehicles within the requirements of each particular vehicle:

- Deferred Compensation/457 Account
- Health Savings Account (HSA)

13.6 Employees must notify the Employer as soon as possible in the case of unforeseen illness or emergency and request appropriate leave. Holidays and personal business time off must be approved by the appropriate supervisor as established by department rules. Normally, at least five (5) working days advance notice of the absence will be required unless mutually agreed upon shorter notice is provided. Vacation scheduling shall be in accordance with established departmental rules and regulations.

13.7 *Bereavement Leave*

A maximum of five (5) working days of bereavement leave shall be allowed when there is a death in an employee's immediate family.

Immediate family is defined as spouse, domestic partner, child, mother, father, brother, sister, or step family, aunt, uncle, niece, nephew, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, grandparent, grandchild and grandparent, grandchild of the spouse or member of the employee's immediate household. (It is understood that Bereavement Leave extends to similar members of a domestic partner's family as detailed above, so long as the employee has an active "Declaration of Domestic Partnership" on file with Human Resources prior to the death).

Bereavement leave in excess of five (5) working days may be charged to Paid Days Off (PDO) with the approval of the Chief or Assistant Chief. In addition, the use of a maximum of five (5) PDO's shall be allowed for the bereavement of family members outside the immediate family.

The City reserves the right to require documentation of the death and/or any other time taken related to a death.

If any employee is on an approved leave of absence at the time of a death, they will be eligible for bereavement benefits if they are receiving at least fifty percent (50%) of their normal semi-monthly base pay from the City. Otherwise, the employee is not eligible for bereavement leave benefits.

Any observed holiday occurring during bereavement leave shall be paid as a holiday consistent with Articles 13 and 15 of this Collective Bargaining Agreement.

13.8 *Washington Paid Family Medical Leave (PFML)*

Guild members will pay the employee portion of the premium and the City will pay the employer portion of the premium, as established by State law. PFML runs concurrently with FMLA.

ARTICLE 14. Sick Leave

14.1 *Sick Leave Accrual (Short-term Disability)*

A. Employees shall accrue ten (10) hours per month in a short-term disability leave account to a maximum accumulation of one thousand twenty-four (1024) hours. Use of this leave is available, as soon as the hours are earned in said bank. Sick leave hours accrued in a pay period cannot be used in the same period in which they are earned, i.e., sick hours accrued in the 1st through the 15th pay period cannot be used until the 16th through the end of the month pay period and so forth for illness or injury. Employees that have established prior eligibility under the LEOFF Act shall be covered by disability benefits provided by the LEOFF system.

14.2 *LEOFF II Time Loss Guarantee*

A. Duty Related Injury Leave

1. In lieu of the statutory supplement described in RCW 41.04.500 et seq., the City will supplement the time loss payments received by employees who have suffered on-the-job injuries as follows:
   a. The City will provide its supplement by paying the employee's base salary during a period of time loss. The City's supplement will begin on the first date an employee is entitled to time loss benefits under RCW, Title 51 and shall continue as long as the employee is

receiving benefits under RCW, Title 51, up to a maximum of six (6) months from the first date of time loss.

b. The six (6) month period that the City provides the LEOFF Supplement shall begin on the first day the employees receive the LEOFF Supplement, which may or may not coincide with the payment of time loss.

c. The three-day waiting period is defined as the first three days after an employee's date of injury, not including the date of injury.

    (i) If an employee sees a medical provider during the statutory three-day waiting period after the date of injury, is determined to not be able to work as a result of their injury, and would not ordinarily be entitled to time loss during this period under L&I guidelines and/or RCW Title 51, then the employee will receive the LEOFF Supplement for hours missed on their date of injury and the three-day waiting period at their normal base rate.

    (ii) If time loss is paid pursuant to L&I guidelines and/or RCW Title 51 for the three-day waiting period after the date of injury, then the employee will receive the combination of time loss and the LEOFF Supplement for those days. The LEOFF Supplement will be paid for hours missed on the date of injury.

    (iii) If an employee does not seek medical treatment until after the three-day waiting period, then any time missed from work on the date of injury and those first three days will be coded using their accrued sick leave.

d. Employees receiving City's time loss supplement must, within ten (10) business days of receipt, sign over to the City all time loss payment checks provided by the City's insurance administrator and/or the State.

e. Should the 6- months LEOFF supplement period end mid pay period, the employee will keep the entire time loss payment check and the City will deduct the difference in the final LEOFF supplement period time loss check amount from the employee's city payroll.

2. After this first six (6) month period, the supplement, up to their normal monthly salary, will be paid from the employee's available leave accruals.

3. Employee benefits including health and STD and PDO accruals will continue for the duration of the employee's employment.

B. Work-related disability shall be defined as:

(1) That which is eligible for payment of benefits under the state's Workers' Compensation program, excluding any disability which occurs during, and as a result of participation in, the basic police academy training program.

(2) That which is incurred while off duty, in response to a situation where such response is in accordance with departmental policy.

C. Employees disabled may be required to perform light duty work as assigned by the employer as provided under Worker's Compensation.

D. The parties expressly agree that the benefits provided by this article exceed the benefits under RCW 41.04.500 et seq.

E. In the event the Washington State legislature modifies the provisions of the LEOFF Act for LEOFF-II employees, this section shall be reopened for negotiations upon the request of either party.

14.3 **Sick Leave Pay Out Upon Death**. If the employee dies while employed by the City of Vancouver, the City will pay the beneficiary an amount equal to one hundred percent (100%) of the value of the employee's existing sick leave accrual balance up to a maximum of one thousand twenty-four (1024) hours.

14.4 **Sick Leave Sell Back Upon Retirement**. An employee separated from service due to retirement for disability or length of service

retirement shall have their sick leave cashed out and deposited into the employee's HRA/VEBA account, with no employee election to receive the amount in cash, according to the following tiers:

- At the rate of twenty-five percent (25%) for hours 1 through 400;
- At the rate of thirty-five percent (35%) for hours 401 through 800; and
- At the rate of forty-five percent (45%) for the hours of 801 through 1,024.

For example: an employee with 900 hours of sick leave at retirement would receive an amount deposited into the employee's HRA/VEBA account, consisting of a 25% cash out of 400 hours (100 hours), plus a 35% cash out of 400 hours (140), plus a 45% cash out of 100 hours (45 hours), for a total of 285 sick leave hours.

ARTICLE 15. Holidays

15.1 The following days are recognized as "legal" holidays, for which time off is to be granted as provided for in Article 13 of this Agreement:

New Year's Day - January 1st
Martin Luther King Jr. Day - Third Monday in January
President's Day - Third Monday in February
Memorial Day - Last Monday in May
Juneteenth – June 19th
Independence Day - July 4th
Labor Day - First Monday in September
Thanksgiving Day - Fourth Thursday in November
The day immediately following Thanksgiving Day
Christmas Day - December 25th

15.2 *In Lieu of Holiday Pay - History*

When the paid days off (PDO) concept was introduced, it eliminated the obligation of the Employer to pay overtime for holidays worked. Two and four-tenths percent (2.4%) of the base rate was added to all classifications as compensation for an "in lieu of pay for holiday time."

A. Effective January 1, 2000, the parties agreed to eliminate the two and four-tenths percent (2.4%) in lieu of pay and added it to the differential component, as outlined in Article 12.2(A)(a)(iii) to this Agreement.

B. Effective January 1, 2023, the parties agreed to include Juneteenth as a recognized “legal” holiday, and increased the differential component of “in lieu of pay for holiday time” to two and seven-tenths percent (2.7%).

ARTICLE 16. Employee Insurance

16.1 **Life Insurance.** Each employee shall receive a term life insurance policy in the amount of one times (1X’s) their annual salary, rounded to the nearest thousand dollars ($1000.00), double indemnity, which premium will be paid by the Employer.

16.2 **Health Insurance.**
Effective November 10, 2025, VCG moves to the 2026 Plan Design and amounts as part of this agreement and as set forth below.

A. Employees and their eligible dependents will have the option of selecting any combination of medical and dental coverage from the following:

a. **Medical**

i. **Option #1** Kaiser Traditional HMO

ii. **Option #2** Kaiser High-Deductible HMO

iii. **Option #3** Regence Traditional PPO

iv. **Option #4** Regence PPO High-Deductible

b. **Dental**

i. Option #1 Delta Dental

ii. Option #2 Willamette Dental

iii. Option #3 Kaiser Dental HMO

c. **Vision**

i. Option # 1 VSP Vision (for Regence Plans)

ii. Option # 2 Included in Kaiser Medical Plans

B. **Consumer Driven Health Plans (CDHP).**

a. CDHP's will include a Health Savings Account (HSA).

i. The City will make an annual contribution in January to the Employee's HSA in the following amounts:

1. Employee-only coverage –Sixteen hundred dollars ($1,600)
2. Employee plus one (1) or more dependents – Three thousand-two-hundred dollars ($3,200)

b. Employees may also contribute pre-tax dollars to their HSA up to the limits allowed by law.

In addition, members have an opt-out/cash-back option for eligible employees upon certification of other group coverage.

C. **Premiums.** Each employee with dependents will pay ten percent (10%) of the actual medical insurance premium cost for the employee's dependents per month on a pre-tax basis.

D. **Flexible Spending Account (FSA).**

a. For employees enrolled in a non-CDHP plan: Employees will have the option of participating in an FSA for reimbursable medical costs, dependent care costs, or premium sharing costs.

b. For employees enrolled in a CDHP plan: Employees will have the option of participating in an FSA for dependent care costs.

16.3 Employer has the right to select insurance carrier(s), provided, however, that at least two medical plans will be offered and that the aggregate schedule of benefits currently enjoyed will not be substantially changed.

16.4 The Employer shall provide liability insurance (or self-insurance) for Guild employees. Such insurance shall defend and indemnify employees against allegations arising from all acts or omissions occurring within the scope of the duties and responsibilities of the employee's employment. Such insurance or self-insurance shall also cover all costs, including attorney's fees, connected with proposed or threatened suits and negotiated settlements, provided that the City need not indemnify or defend the employee for any act found by the Department to be dishonest, fraudulent, criminal or malicious, or for any suit brought against the employee by or on behalf of the City.

16.5 **HRA/VEBA.** The City will administer a qualified HRA/VEBA account for each employee. In the event of a change, the City agrees to bargain the

impacts of the selected VEBA program/vendor prior to implementation of the change. Effective January 1, 2026, the City will deposit an amount equivalent to three quarters percent (0.75%) of the employee's base salary per month to each employee's HRA/VEBA account. Effective January 1, 2027, the City will deposit an amount equivalent to an additional one-quarter percent (0.25%) of base salary for a total of one percent (1.0 %) of the employee's base salary per month to each employee's HRA/VEBA account. Effective January 1, 2028, the City will deposit an additional amount equivalent to one-half percent (0.5%) for a total of one and one half percent (1.5%) of the employee's base salary per month to each employee's HRA/VEBA account. The employee's HRA/VEBA account is owned by the employee, portable after separation, and usable both while actively employed and in retirement.

ARTICLE 17. Medical Examinations

17.1 The Employer has the right to require periodic medical examinations (physical and psychological) of all employees covered by this Agreement provided the examination is job related and consistent with business necessity. The Employer also has the right to require certification from a physician that an employee is physically and mentally able to return to work following a period of disability leave.

ARTICLE 18. Deferred Compensation

18.1 Employees may participate, at their option and cost, in the deferred compensation programs identified by the City (with at least two programs offered). In the event of a change, the City agrees to bargain the impacts of the selected program/vendors prior to implementation of the change. e.

18.2 Effective January 1, 2026, the City will match, up to a maximum of three and one half percent (3.5%) of the employee's base salary, an employee's contribution to the deferred compensation program(s) offered by the City, such contribution subject to the Internal Revenue Service (IRS) limitations.

ARTICLE 19. Tuition Assistance

19.1 Requests for tuition assistance to attend specialized individual training or academic training shall be processed in accordance with City policy.

ARTICLE 20. Clothing Allowance

20.1 The Employer shall purchase and replace such clothing, uniforms, and other equipment as designated by the Chief of Police or Assistant Chief, and shall make all necessary uniform replacement as the need arises. Employees shall be paid an annual allowance for clothing purchases of six hundred dollars ($600.00).

A. For employees newly hired (not promoted) mid-year, they will receive a pro-rated amount based upon their month of hire.

a. e.g. newly hired in July = six (6) months of service equates to a three hundred dollar ($300.00) payment ($600.00/12 = $50.00 per month -- $50.00 x 6 months = $300.00)

B. For employees promoted into the Guild mid-year, they will receive any difference in allowance between the Union and the Guild.

a. e.g. If the Guild has a five hundred fifty dollars ($550.00) allowance, the promoted employee will receive fifty dollars ($50.00) – ($600.00-$550.00 = $50.00)

20.2 Employees agree to maintain all clothing and equipment in good condition and not subject it to abuse beyond the regular call of duty.

20.3 The Employer shall provide for each employee a standard service side arm and a standard set of handcuffs which the employee will maintain and return to the Employer upon the termination of the employee's service. The Employer shall determine the standard service side arm and handcuffs to be provided. If the employee chooses to carry other than the issued sidearm, the employee will return the issued sidearm when authorized to carry an alternative sidearm.

20.4 The City will repair or replace eye glasses and/ or authorized personal items damaged or destroyed beyond normal wear and tear while on duty. The employee shall assist the Employer in securing restitution or indemnification through the courts by the Employer. It is not the intent of this Article to compensate for an employee's negligence and/or carelessness.

ARTICLE 21. Annexation

21.1 It is understood and agreed that in the event of an annexation to the City of Vancouver requiring a transition period, the City may subcontract police services providing such activity does not result in the layoff of bargaining unit employees or a reduction of employees or positions within the bargaining unit. This transition period shall be for a reasonable period in order to permit the orderly and safe transition of police services to the annexed area.

21.2 It is further agreed that should the City hire Law Enforcement Officers laid off from another jurisdiction which is enveloped in the annexation, such Law Enforcement Officers shall have their length of service in the other jurisdiction applied toward their seniority with the City for lay off purposes, provided they are laid off by inverse seniority as contemplated by RCW 35.13.360-400 (1993 c 189 sections 2-6).

ARTICLE 22. Educational Incentives

22.1 General Eligibility

Current active employees holding the rank of Lieutenant and Commander may participate, if eligible, in the incentive program as described in the following sections of this Article. Benefits payable under the incentive program cease when an employee terminates, retires, or is on an extended leave of absence without pay for more than thirty (30) consecutive calendar days. Such benefits shall cease effective on the date of termination or retirement; or, in the case of extended leave of absence without pay, on the thirty-first day of absence. Pay will be reinstituted effective on the first day of the month next following the employee's return to work.

A. To receive the second year award of 2.5% of base pay/month, the employee must:

(1) Have an associate degree from an accredited college or university in an eligible course of study; or

(2) Have completed 92 quarter hours or 54 semester hours and be currently enrolled in a bachelor's degree program at an accredited college or university in an eligible course of study.

To maintain eligibility for a second year award, an employee enrolled in a bachelor's degree program must furnish to the police chief and human resources director a copy of the official grade report at the end of each quarter or semester and must keep them apprised, in writing, of any circumstances which affect eligibility for educational incentive.

If the employer directs the employee to a work or training assignment that requires the employee to temporarily withdraw from school, payments shall continue under the educational incentive program during such assignment, provided the employee must re-enroll in school at the beginning of the quarter following termination of such assignment. If re-enrollment does not occur, benefits paid beyond the date such assignment ended shall be repaid to the city by the employee.

B. To receive the fourth year award of 5% of base pay/month the employee must:

(1) Have a bachelor's degree from an accredited college or university in an eligible course of study.

(2) It is the employee's responsibility to assure that timely documentation of educational attainment is provided to the Office of the Chief in the form of an official college transcript or degree or both. Payment of incentive awards will begin effective the first day of the payroll period following the date such documentation is provided.

C. Only courses taken through schools accredited by or through the Council for Higher Education Accreditation (CHEA) will be accepted in determining eligibility for educational incentive.

D. The employee's degree must be job-related or contribute to improved performance.

E. Questions arising out of the administration of this program will be resolved by a committee consisting of the police chief and human resources director; however, this will not

prevent an employee from seeking redress through the grievance procedure.

The parties agree that all employees employed in the position of Lieutenant or Commander on January 1, 2026, have met the requirements described above and shall receive the 5% of base pay/month.

ARTICLE 23. Resolution of Disputes

23.1 For purposes of this Agreement, the term “grievance” means any dispute between the Employer, on the one hand, and the Guild or an employee on the other, concerning the interpretation, application or alleged violation of any term of this Agreement. For purposes of this Article, the term “employee” shall include both members of the bargaining unit and the Guild. The parties agree to make every effort to settle grievances at the earliest step possible.

23.2 *Grievance Procedure*

Grievances shall be processed in accordance with the following procedure:

Grievances shall be presented in writing by the employee to their first level supervisor outside of the bargaining unit within twenty-one (21) calendar days of the date of the alleged violation of the Agreement.

The written grievance shall include the following information:

A. A description of the grievance and how the employee(s) was/were adversely affected.

B. A statement of the section(s) of the Agreement allegedly violated and the nature of the violation.

C. The date of the incident(s) grieved.

D. A description of the remedy sought by the employee(s).

E. Identify the employees affected.

F. Specification of the step at which the grievance procedure should begin

(a) For a grievance that involves discipline imposed by the Chief, the grievance shall be initiated at Step 2.
(b) For any other grievance, the grievance shall be initiated at Step 1

The written grievance shall be signed by the employee.

Step 1: The parties will use an interest based problem solving process to resolve the issues identified in the grievance. The process will include all individuals necessary and with authority to reach a resolution. Any resolution of the grievance will be in writing and signed by the parties. If the parties agree that they are unable to resolve the grievance, the parties will outline the areas of disagreement in a memorandum. The employee may advance the grievance to the next step by delivering the memorandum to the Office of the Chief at any time within twenty-one (21) calendar days of filing the grievance. If the grievance is not resolved in twenty-one (21) calendar days, the grievance will automatically advance to Step 2.

Step 2: If the grievance remains unresolved following step 1, the Chief of Police may meet with the employee and their Guild Representative. The Chief shall make a decision on the grievance, in writing, within twenty-one (21) calendar days of receipt of the grievance.

Copies of the Chief's decision shall be mailed, emailed or delivered to the employee and to the Guild.

If the grievance involves a termination of employment, the employee may advance the grievance to Step 3. For all other grievances, the grievance may be advanced to Step 4.

Step 3: If the grievance remains unresolved after the Chief's decision is rendered in Step 2, the employee may deliver the grievance in writing to the City Manager or their designated representative, with a copy to the Chief, within fourteen (14) calendar days after receipt of the decision reached by the Chief in Step 2. The City Manager or their designee may meet with the employee and Guild representative, the Chief of Police, and other directly involved individuals as determined by the City Manager or designee to be appropriate. The City Manager or their designee shall render their decision, in writing, within sixty (60) calendar days of receipt of the grievance. The City Manager or their designee shall mail, email or deliver copies of their decision to the employee, the Guild, and the Chief of Police.

Step 4: If the grievance remains unresolved after the decision is rendered in Step 2 or Step 3, as applicable, the Guild shall decide whether the final Step in the grievance procedure will be arbitration or civil service appeal. The Guild will provide the City with a written notice electing a final step within fourteen (14) calendar days after the mailing, emailing or hand delivery of the decision.

23.3 Unless otherwise agreed by the parties, challenges to the procedural arbitrability of a grievance will be resolved in a proceeding separate from and prior to arbitration on the merits of the grievance. Within fourteen (14) calendar days following receipt of an Arbitrator's decision ruling that a challenged grievance is subject to arbitration, the parties will begin the process described below to select an arbitrator to rule on the merits of the grievance.

23.4 If the grievance is submitted to arbitration, the parties shall attempt to mutually agree on a disinterested third party to serve as Arbitrator. In the event the Employer and the Guild are unable to agree on an Arbitrator; the Arbitrator shall be selected by the process of elimination from a panel of seven (7) arbitrators furnished by the Public Employment Relations Commission (PERC) or the Federal Mediation and Conciliation Service (FMCS). The request to PERC or FMCS shall state the general nature of the issues raised by the grievance and ask that the nominees be qualified. The parties shall promptly strike from the list received. The first strike shall be determined by the toss of a coin. The decision whether to use PERC or FCMS will be by mutual agreement or determined by a toss of the coin.

23.5 The Arbitrator shall consider and decide only the specific issue(s) submitted by the Employer and/or the Guild at the hearing, and shall have no authority to make a decision on any other issue not so submitted. The Arbitrator shall have jurisdiction and authority only to interpret, apply or determine compliance with the specific terms of the Agreement and shall not have jurisdiction to add to, detract from, or alter in any way, the provisions of this Agreement. A decision within the jurisdiction of the Arbitrator shall be final and binding upon all parties. The expenses and fees incumbent to the services of the arbitrator shall be paid by the losing party. Each party shall be responsible for compensating its own representatives and witnesses. Either party may cause a verbatim recording of the hearing to be made, provided it pays the cost of the record. If the other party desires a copy, the cost of the recording and preparation of a transcript shall be shared equally.

23.6 A grievance that involves or affects a significant number of the employees in the bargaining unit may be introduced by the Guild in written form to the Chief of Police as set forth in Step 2 of the grievance procedure.

23.7 Failure by the grievant(s), or a Guild Representative, to advance the grievance within time limits stipulated in this Article shall constitute abandonment of the grievance. The parties may mutually agree in writing to extend the time limit for a given Step for a stated period of time. Failure by the Employer to reply in a timely manner constitutes a denial of the grievance, unless both parties have agreed to an extension of the time line.

ARTICLE 24. Employee Discipline/Termination

24.1 It is hereby recognized and agreed that the Employer has the right to discipline an employee for reasonable and just cause.

24.2 The Employer may use a written warning in lieu of disciplinary action to advise the employee of inappropriate conduct, or of violation of rules. Written warnings shall be placed in the employee's personnel file for a period not to exceed twelve (12) months. An employee may request that the warning letter be reviewed by the Chief of Police after six (6) months for possible removal at that time.

24.3 The Employer may take disciplinary action by written reprimand, suspension, demotion, or discharge. Employees shall be given an opportunity to review and comment upon all disciplinary letters that are placed in their personnel files. The employee shall be requested to sign the disciplinary letter. The signature thereon shall not be construed as admission of guilt or concurrence with the disciplinary action, but rather as an indication that the employee has seen and comprehends the nature of the disciplinary action.

24.4 Copies of all letters of warning or disciplinary action shall be given to the employee at the time the action is taken or shortly thereafter, and notice of such action shall be forwarded to the Guild.

24.5 An employee suspended without pay may request to forfeit accrued paid days off on a day for a day basis, in lieu of unpaid time off. Substitution of PDO for unpaid time in no way reduces the level of discipline from a suspension.

ARTICLE 25. Non-Reduction of Wages and Working Conditions

25.1 The parties hereto agree that the wages and working conditions in effect and now being paid to and enjoyed by the members of the Guild shall be those ratified by both parties signatory to this Agreement and shall not be reduced in view of the provisions of this Agreement. Nothing in this Article shall be construed to limit in any way the Employer's rights under Article 3 - Rights of Management of this Agreement.

25.2 The Employer and the Guild agree that past practices that are mandatory subjects of bargaining and are not specified by this Agreement but known by both the Guild and the Employer shall remain unchanged, unless bargained to completion consistent with RCW 41.56.

ARTICLE 26. Conflict of Contract and Personnel Policies

26.1 It is agreed that the intent of the parties is that this Agreement and all working agreements shall be consistent with the personnel policies. Where it is found that the provisions of such an agreement are in conflict with the personnel policies, the provisions of this Agreement shall apply.

ARTICLE 27. Separability

27.1 If any article of this Agreement should be held invalid by operation of law or by any tribunal of competent jurisdiction or if compliance with or enforcement of any article should be restrained by such tribunal, the remainder of this Agreement shall not be affected thereby and the parties shall enter into immediate collective bargaining negotiations for the purpose of arriving at a mutually satisfactory replacement for such article.

ARTICLE 28. Fair Labor Standards Act

28.1 In the event of changes in the application of the Fair Labor Standards Act to State and local governments or in the Federal Government implementing regulations which impact upon the provisions of this Agreement or the application thereof, the parties agree that such provisions are immediately subject to renegotiation upon the request of either party to this Agreement.

ARTICLE 29. Termination and Renewal

29.1 This agreement is effective January 1, 2026, and shall remain in full force and effect through December 31, 2028.

29.2 Pursuant to the provisions of RCW, Chapter 41.56, the employer and the Guild agree to commence negotiations not later than May 1 of the expiration year.

ARTICLE 30. Contract Amendments

30.1 The parties agree that this Agreement may be amended in writing as agreed to by both parties without action of their respective legislative bodies, unless otherwise specified herein, including, but not limited to, amendment by Memorandum of Understanding or Memorandum of Agreement.

APPENDIX A

VANCOUVER COMMAND GUILD

Rates of Pay
TABLES TO BE UPDATED BASED ON TENTATIVE AGREEMENT

Effective January 1, 2026

	STEP	STEP	STEP	STEP	STEP	STEP
RANK	1	2	3	4	5	6
LIEUTENANT						
COMMANDER						

Effective January 1, 2027

	STEP	STEP	STEP	STEP	STEP	STEP
RANK	1	2	3	4	5	6
LIEUTENANT						
COMMANDER						

Effective January 1, 2028

	STEP	STEP	STEP	STEP	STEP	STEP
RANK	1	2	3	4	5	6
LIEUTENANT						
COMMANDER						

DATED this _____ day of _____, 2026.

For the Employer:

_____
Lon Pluckhan, City Manager

_____
Antoinette Gasbarre, HR Director

For the Guild:

_____
Blaise Geddry, VCG President

Approved as to form:

_____
Nena Cook, City Attorney

Attest:

_____
Lisa Brandl, City Clerk

AGREEMENT

By and Between

City of Vancouver

and

VANCOUVER COMMAND GUILD

January 1, 2026~~3~~ – December 31, 2028~~5~~

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VANCOUVER COMMAND GUILD

AGREEMENT

This Agreement, as of the date indicated herein, by and between the City of Vancouver, a municipal corporation of the State of Washington, and hereinafter referred to as the "Employer," and the Vancouver Command Guild, hereinafter referred to as the "Guild," WITNESS that WHEREAS the parties have negotiated the terms and conditions of a collective bargaining agreement, hereinafter referred to as the agreement, relating to permanent, full-time Police Lieutenants and Police Commanders, hereinafter referred to as employees, represented by the Guild and described in this agreement, as to wages, hours, and other terms and conditions of employment of such employees and wish to reduce the agreement to writing, agree hereto as follows:

ARTICLE 1. Guild Recognition

1.1 The Employer recognizes the Guild as the exclusive bargaining agent for all of its employees covered by this Agreement.

1.2 The Employer and the Guild agree that questions of Guild representation that may arise shall be resolved in accordance with the rules of the Washington State Public Employment Relations Commission and in accordance with local, state, or national statutes and rules.

ARTICLE 2. Nondiscrimination

2.1 The parties agree that the provisions of this Agreement shall be applied equally to all employees covered hereby without regard to race, color, national origin, sex, age, physical or mental disability, political or religious opinions, labor organization affiliation, sexual orientation, gender identity, pregnancy, marital status, military status, or membership in any other class protected by state or federal law or City ordinance, unless such would prohibit performance of a qualifications standard that is job related and consistent with business necessity or necessary to prevent a direct threat to health and safety.

2.2 All references to members or employees in this Agreement designate both sexes; wherever the male gender is used it shall be construed to include both male and female members or employees as appropriate.

2.3 Employees shall process discrimination, retaliation, and/or bullying complaints ~~grievances~~ under the applicable City~~'s~~ Equal Employment Opportunity or HR/Department policy and procedure or under existing

state or federal law, and shall not have recourse through the grievance procedures established in Article 23 of this Agreement.

ARTICLE 3. Rights of Management

3.1 The management of the municipal corporation, including but not limited to, the organization, scheduling, staffing, and direction of the work force, is vested exclusively in the Employer, subject to the terms of this Agreement.

Examples of management rights include, but are not limited to:

~~1.1.~~ 3.1.1 to determine the number of employees to be employed;
~~1.2.~~ 3.1.2 to hire employees, determine their qualifications and assign and direct their work;
~~1.3.~~ 3.1.3 to evaluate employee performances;
~~1.4.~~ 3.1.4 to set the standards of productivity, and the services to be provided;
~~1.5.~~ 3.1.5 to control and regulate the use of facilities, equipment, and other property of the Employer;
~~1.6.~~ 3.1.6 to determine the number, location and operation of departments, divisions, and all other units of the Employer.

The Employer has the right to introduce any and all new improved and automated methods or equipment to improve efficiency and to reduce costs and assign employees within the bargaining unit in accordance with such improvements and cost reduction methods. All matters not specifically and expressly covered or treated by the language of this Agreement may be administered for its duration by the Employer in accordance with such policies or procedures as the Employer, from time to time, may determine. This Article recognizes an employee's right to use the grievance procedure set forth in Article 23 of this Agreement.

Nothing in this Article shall be considered a waiver of the Guild's right to bargain over mandatory subjects of bargaining pursuant to RCW 41.56.

3.2 *Department Rules and Regulations*

It is mutually agreed that the City has full responsibility and authority to adopt rules and regulations for the operation of the Police Department and the conduct of its employees, and the Guild agrees that its members shall comply in full with such rules and regulations. Nothing in this Section shall be interpreted to restrict the Chief's right to make decisions or to establish procedures consistent with the "emergency" nature of operating the department.

ARTICLE 4. Employee Rights

4.1 The Employer recognizes and agrees that employees of the Police Department covered by this Agreement are entitled to all rights and privileges accorded ordinary citizens under all applicable provisions of the United States and State Constitutions as well as the rights and privileges granted by any and all applicable legislation and the common law.

ARTICLE 5. Union Security, Dues and Other Associated Dues

5.1 The parties agree that the terms of this Agreement apply equally to all employees in the bargaining unit and as defined in the Preamble to this Agreement. Any bargaining unit employee may authorize the Employer to deduct from their pay the amount of Guild membership dues charged by the Guild for representation and services provided by the Guild by providing notice to the Guild.

Any bargaining unit employee who does not want to be a member of the Guild, but who nonetheless wants to pay for services provided by the Guild has the voluntary option to pay fair share fees in an amount equal to membership dues. Any member of the bargaining unit may authorize the Employer to deduct from their pay voluntarily fair share fees in an amount equal to Guild dues charged by the Guild by providing notice to the Guild.

The employee's authorization will remain in effect until expressly revoked by the employee by notice to the Guild in accordance with the terms and conditions of the authorization. The Employer will rely on information provided by the Guild regarding the authorization and revocation of deductions.

5.2 Upon receipt of an employee request for authorization or revocation of authorization, the Employer shall notify the Guild as soon as possible via email, but no more than five (5) working days of the notification. The Employer will take no action upon receiving an employee request until receiving confirmation from the Union to begin or end deductions.

5.3 The Employer agrees to notify the Guild president when a represented position is filled within thirty days from the date of employment.

5.4 The Guild, upon completion of the employee orientation, shall provide the Employer notification as to whether such employees authorized dues deduction, fair share fees, or declined to pay dues. The Employer will

deduct such dues/voluntary fair share fees from the wages of those employees and forward them to the Guild each month.

5.5 The Guild shall indemnify, defend and hold harmless the Employer and its officials, representatives and agents against any and all claims, demands, suits, or other forms of liability (monetary or otherwise) and for all reasonable legal costs that shall arise out of or by reason of action taken or not taken in good faith by the Employer in complying with the provisions of this Article. If an improper deduction is made, the Guild shall refund directly to the employee any such amount.

ARTICLE 6. Guild Representatives and Activities

6.1 The Guild shall inform the Employer in writing of the names of its current executive board members and attorneys who are designated to represent it. This information shall be kept up-to-date at all times. Only persons so designated will be accepted by the Employer as representatives of the Guild during the grievance process and on bargaining issues. The Guild may designate other members as representatives during contract negotiations.

6.2 The Guild's officers and attorneys shall have reasonable access to the Department during working hours, providing they do not interfere with or cause employees to neglect their work.

6.3 Employees and attorneys visiting the premises shall not engage in organizing or campaigning for the Guild, but this paragraph will not prevent the Guild from discussing in non-work areas during non-work periods matters of Guild membership, fees, dues, or Guild business with employees covered by this Agreement.

6.4 The Employer agrees not to discriminate against any member of the Guild because of their activity on behalf of or their membership in the Guild, provided such activity is not carried on during working hours, except as expressly provided in this Agreement.

6.5 Within the first 90 days of the employee's start date, the Employer agrees to allow the Guild thirty (30) minutes during the employee's regular working hours to provide new members information about the Guild.

6.6 The Employer agrees to allow leave with pay for employee members of the Guild for no more than twelve (12) work-shifts (96 hours) per year total, for conducting business vital to the Guild. The leave will be

scheduled in advance based on vacation scheduling guidelines. Time away from their work assignment to act in the role of Guild representative shall be coded as “Union Leave” in the Department’s payroll system.

6.7 Employees on the Guild bargaining committee (not Guild leave) who are already scheduled to work during times scheduled for negotiating a new Collective Bargaining Agreement will be allowed to attend those negotiations as employer paid work time. The Employer will not make special provisions to arrange shifts to maximize on duty participation in negotiations.

6.8 Employees designated as Guild representatives will be permitted to use work time for the investigation of grievances and representation of employees with grievances when appropriate.

ARTICLE 7. Strikes, Work Stoppages or Work Slowdowns

7.1 The Employer and the Guild recognize that the public interest requires the efficient and uninterrupted performance of all city services, and to this end pledge their best efforts to avoid or eliminate any conduct contrary to their overall objective. During the term of this Agreement, neither the Guild nor the Employer shall cause, engage in, or sanction any work stoppage, strike, slowdown, lockout or other interference with City functions. Employees who engage in any of the foregoing actions may be subject to immediate disciplinary action, including discharge, and the Guild may be subject to action in accordance with RCW 41.56.

ARTICLE 8. Identification of Jobs

8.1 "Job" shall be defined as the employee's job title (classification), position number, and pay range assigned by the Employer.

8.2 When work operations involving new or substantially changed requirements are established after the effective date of this Agreement and such requirements are not adequately or specifically described in an existing job, the Employer will describe and establish a new job in an appropriate range subject to the Employer's duty to bargain with the Guild concerning appropriate compensation for the new job, if agreed to be within the bargaining unit.

ARTICLE 9. Job Vacancies/Probationary Period

9.1 All vacancies will be filled in accordance with the established rules and regulations of the Vancouver Civil Service Commission ~~as of December 20, 2006~~; and all applicable State and Federal laws.

9.2 Employees promoted to the position of Lieutenant or Commander shall serve a twelve (12) month probationary period during which time the Employer may decide to return the employee to the employee's ~~his or her~~ former classification. Demotion during the promotional probationary period is not subject to grievance under this Agreement.

9.3 Employees hired (not promoted) into the position of Commander shall serve a twelve (12) month probationary period during which time the Employer may terminate the employee. Termination or discipline of a probationary employee is not subject to grievance under this Agreement.

9.4 For any time-off an employee takes in excess of thirty (30) consecutive calendar days during the twelve (12) month probationary period for which the employee is unable to be meaningfully evaluated in their position, the Employer may extend the probation period by a time equal to the period lacking meaningful evaluation. Such probationary extension periods will not result in the employee losing scheduled step increases.

ARTICLE 10. Layoff and Recall

10.1 Layoff and recall shall be in accordance with the established rules and regulations of the Vancouver Civil Service Commission ~~as of December 20, 2006~~, with the following exceptions:

A. In the event of a layoff, employees will be laid off in the order of their seniority. Seniority shall be defined as time in rank.

B. At the time of any layoff, lieutenants and commanders may be given an opportunity to accept a reduction to the next lower rank in lieu of layoff. Such employees shall have bumping rights over the employee in the next lower rank with the least seniority. Seniority shall be defined as time in the rank plus time in any higher rank.

C. Employees laid off or demoted in lieu of layoff shall be placed on a reinstatement list for the rank from which the layoff took place.

D. Employees who accept a reduction in lieu of layoff shall remain on the reinstatement list indefinitely. Laid off employees shall remain on the reinstatement list for a maximum of twenty-four (24) months.

E. Laid off employees who are offered reinstatement shall receive a conditional offer. The offer will be conditioned on the successful completion of the following:

1. A background investigation and polygraph. The investigation and polygraph will be limited to the period of time between the date of layoff and date of proposed reinstatement.
   i. Should the polygraph come back inconclusive, the employee will be given an option for a 2nd polygraph with a different polygraph examiner at the City's expense.
   ii. Should the 2nd polygraph also be inconclusive, the laid off employee's eligibility for reinstatement will end.

2. A medical examination and psychological evaluation.

3. A drug screen.

F. An individual will lose rights to reinstatement and/or be removed from the reinstatement list if they commit an act that would be cause for termination of employment of if they lose their commission as a general authority law enforcement officer.

G. Appointments from the reinstatement list shall be made in the order of length of service in that specific rank. The employee on the reinstatement list who has the most time in rank shall be reinstated first.

1. For employees on the reinstatement list for the position of Lieutenant, "length of service" and "time in rank" shall be defined as time employed as a Lieutenant for the Vancouver Police Department.

2. For employees on the reinstatement list for the position of Commander, "length of service" and "time in rank" shall be defined as time employed as a Commander for the Vancouver Police Department.

ARTICLE 11. Work Week, Hours of Work, Shifts

11.1 *Work Week:*

A. Recognizing that flexibility is required in the scheduling of assignments for command personnel, the normal work week shall be the equivalent of forty (40) hours per week with normal assigned work schedules as follows:

A five (5) day work schedule Monday through Friday beginning between 7:00 a.m. and 9:00 a.m., or

A mutually agreed upon 9/80 schedule, working 80 hours over two work weeks, with eight (8) nine (9) hour days, one (1) eight (8) hour day, and one (1) day off. Employees will work Monday through Friday, beginning between 7:00am and 9:00am, or

A mutually agreed upon four (4) day schedule not to exceed ten (10) hours per day, or

A Night Patrol Lieutenant who shall be scheduled to work, as determined by the Chief or their designee, four (4) days per week, ten (10) hours per day plus a thirty (30) minute unpaid lunch; or the patrol schedule, a 5/4, 5/4, 5/5 (10.5 per day with a thirty (30) minute paid lunch. The normal working hours shall overlap with Graveyard shift for a period of at least two (2) hours.

B. In all cases, the required work hours shall be posted in the position announcement, before the assignment is made.

C. The Police Chief and Assistant Chief(s) retain the management right to:
   a. modify normal work schedules in emergency circumstances;
   b. for job performance related reasons;
   c. for training purposes; or
   d. for short term operational needs.

D. On mutual agreement of the employees involved and the employer, the normal assigned work week and/or hours of work may be adjusted for temporary assignments of up to ninety (90) days when consistent with the operational needs of the department. Assignments of longer than ninety (90) days shall be a mandatory subject of bargaining.

11.2 *Modification of Normal Work Schedules.*

The parties agree to consider modifications to the normal work schedule for employees when there is a demonstrated need. Such changes shall not be precedent setting. If such modified work schedules are approved by the Police Chief or Assistant Chief and the employee, the Guild agrees to allow members of the bargaining unit to work mutually agreed schedules.

11.3 *Shift Exchanges*

A. Each member of the Police Department covered under this Agreement may be allowed to exchange shifts with other members when the change is not detrimental to the best interests of the Police Department as determined by and subject to the approval of the Police Chief or Assistant Chief.

11.4 Wellness

A. On-duty wellness time is administered in accordance with Department policy.

ARTICLE 12. Rates of Pay

12.1 The hourly rate of an employee on a forty (40) hour work week will be the monthly base rate multiplied by twelve months and divided by two thousand eighty (2080) hours. This rate multiplied by eight (8) hours will be the daily base rate; multiplied by forty (40) hours will be the weekly base rate; and multiplied by one hundred seventy-three and three tenths (173.3) hours will be the monthly base rate.

12.2 Rates of pay will be as set forth in Appendix "A" to this Agreement.

Effective January 1, 20263

Salary schedules for Lieutenants and Commanders will be adjusted by seven percent (7%). ~~six percent (6%).~~

Effective January 1, 20274

Salary schedules for Lieutenants and Commanders will be adjusted by three percent (3%). ~~four percent (4%).~~

Effective January 1, 2028~~5~~

Salary schedules for Lieutenants and Commanders will be adjusted by three percent (3%). ~~four percent (4%).~~

A. **Lieutenant.** The base wage for top step Lieutenant shall be not less than ~~22.7%~~ nineteen and seven-tenths percent (19.7%) above top step Sergeant.
   a. The ~~22.7%~~ nineteen and seven-tenths percent (19.7%) includes: ~~comes from the following history~~:
      i. ~~15%~~ Seventeen percent (17.~~5~~%) differential ~~(prior to the elimination of educational incentive and in lieu of holiday pay~~)
      ii. Two and seven- tenths percent (2.7%) in lieu of holiday pay.
         1. 17+2.7 = 19.7%
      iii. ~~5% educational incentive~~
      iv. ~~2.7% in lieu of holiday pay~~
         1. ~~15 + 5 + 2.7 = 22.7%~~

B. **Commander.** The base wage for top step Commander shall not be less than 10% above top step Lieutenant.

C. **Education.** Education is provided in Article 22 and removed from the differential.

Bargaining Note: The additional compression amount is contingent on agreement from VCG with the City's contract interpretation on the pending grievance regarding *Article 12 Section 12.5 Callback Pay* and withdrawal of said grievance.

12.3 The night lieutenant shall receive a shift differential of fifty cents ($.50) per hour for each hour worked. Shift differential premium pay shall be included in vacation pay based on specific shift assignment.

12.4 *Overtime*

A. As executive management level employees, Commanders and Lieutenants are accountable for personal time management. Each employee shall determine when it is appropriate to flex work hours, use accrued PDO or sick leave hours, and/or to request overtime pay or compensatory time off. Requests for overtime pay must be for work related performance of employees' duties or projects assigned by VPD.

B. Each employee is personally responsible for assuring that the employee's ~~his or her~~ personal work hours, overtime hours,

compensatory time and paid leave time are accurately documented in the City's time and payroll records.

C. In the event the need for overtime should arise in the police department, the employee working overtime shall be paid at one and one-half times the employee's ~~his~~ hourly rate of pay.

D. Employees are eligible for overtime pay for all hours worked beyond forty (40) compensable hours in the established seven (7) day work week. The established work week is seven consecutive work days beginning at 12:01 a.m. Sunday and ending at midnight on Saturday.

E. Compensatory Time. By mutual agreement of the employer and employee, employees may accrue compensatory time off in lieu of overtime compensation. Compensatory time off shall be accumulated at the same rate as overtime compensation would have otherwise been paid. Employees may not accumulate compensatory time off in excess of ninety (90) hours.

12.5 *Callback Pay*

Callback pay shall be paid at the rate of double the regular rate of pay when the Police Chief or Assistant Chief requires that the employee work under the following circumstances. For the purposes of this section, work includes receiving command notifications.

A. On a day already worked or to be worked: If the employee has completed their regular shift, is on the way home, or at home and is required to work other than an extension at the beginning or end of their shift.

B. On days of rest: If not scheduled before 11:00 p.m. the day before the proposed work, or before the end of the last shift worked before the proposed work, whichever is later.

C. ~~Callback pay shall be paid at the rate of double the base rate of pay for~~ Callback shall be paid for a minimum of one and one half hours, or actual hours worked if the amount of time exceeds one and one half hours, when the employee is required to physically respond to work. The one and one half hours of minimum callback pay begins at the time of the call, text, or email originating the physical callback.

D. Employees who receive a call, text, or email for a substantive, work-related issue, but do not physically respond to work as a result, will be compensated for the cumulative minute-by-minute basis for all calls/texts/emails between shifts at the rate of double the regular rate of pay rounded up to the nearest quarter hour, for a minimum of one hour (1.0 hour). The foregoing shall not apply to de minimis calls/texts/emails, lasting less than five (5) cumulative minutes, calls/texts/emails for emergency call back, or calls/texts/emails for overtime availability. If an employee receives off-duty calls/texts/emails and is then subsequently physically called back to work as a result of such calls/texts/emails, the employee shall receive compensation beginning from the first calls/texts/email, as set forth in the paragraph above.

12.6 *Court Appearances*

A. Court appearances during off-duty hours of a scheduled day of work will be compensated at the rate of one and one-half times base rate for a minimum payment for three (3) hours.

12.7 *Step Increases*

Step increases will be made effective on the adjusted salary review date of the employee's promotion. For example, if an employee is hired between the first (1st) and the fifteenth (15th) of the month, the pay adjustment would be on the first (1st) day of the current month. If an employee is hired between the sixteenth (16th) and the end of the month, the adjustment would be on the first (1st) day of the following month.

12.8 *Retention Pay*

For the purposes of this article, years of service will be defined as years of continuous service with the Vancouver Police Department.

Years of service	Percentage of base pay
~~Beginning of~~ 7~~+~~ to 10 years of service ~~years to completion of 9 years~~	2%
~~Beginning of~~ 10~~+~~ to 15 years of service ~~to completion of 14 years~~	4%
~~Beginning of~~ 15~~+~~ to 20 years of service ~~to completion of 19 years~~	6%
~~Beginning of~~ 20~~+~~ to 25 years of service ~~years and more~~	8%

25+ years of service 10%

City proposal on external service credit is CCL, meaning no consideration for external service.

ARTICLE 13. Leave Benefits

13.1 Each employee shall be granted paid days off to be used during the year for vacation, illness, holidays, or personal business time off. Bereavement leave shall be separate and as specified in Section 13.7 of this Article. Paid Days Off (PDO) are accrued in accordance with the following schedule:

PAID DAYS OFF (PDO) ACCRUAL SCHEDULE

During Years of Service	Accrual Rate Per Month (Hours)	Maximum Accrual (Hours)
0 to 1	14.00	336
1+ to 5	19.50	468
5+ to 8	20.50	492
8+ to 12	21.50	516
12+ to 15	22.50	540
15+ to 20	25.50	612
20+	27.50	660

13.2 Employees may begin using accrued PDO hours as soon as they become available in their bank. PDO hours accrued in a pay period cannot be used in the same pay period in which they are earned, i.e. PDO hours accrued in the 1st through the 15th pay period cannot be used until the 16th through the end of the month pay period and so forth.

13.3 Employees must schedule and take at least ten (10) shifts of vacation (PDO's) each calendar year. Upon termination of employment, an employee shall be paid for all earned and accrued paid days off at the employee's rate of pay.

13.4 Eligible employees may sell back up to sixty (60) accrued and unused PDO hours during each calendar year. “Eligible employees” include those employees who are able to comply with Section 13.3 of this Article **after** selling back PDO hours.

13.5 Upon separation from employment, employees may upon their choosing have all or a portion of their vacation (PDO) and/or compensatory time hours accrued deducted before taxes, and paid into one (1) of the following tax deferred vehicles within the requirements of each particular vehicle:

- Deferred Compensation/457 Account
- Health Savings Account (HSA)

13.6 Employees must notify the Employer as soon as possible in the case of unforeseen illness or emergency and request appropriate leave. Holidays and personal business time off must be approved by the appropriate supervisor as established by department rules. Normally, at least five (5) working days advance notice of the absence will be required unless mutually agreed upon shorter notice is provided. Vacation scheduling shall be in accordance with established departmental rules and regulations.

13.7 *Bereavement Leave*

A maximum of five (5) working days of bereavement leave shall be allowed when there is a death in an employee's immediate family.

Immediate family is defined as spouse, domestic partner, child, mother, father, brother, sister, or step family, aunt, uncle, niece, nephew, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, grandparent, grandchild and grandparent, grandchild of the spouse or member of the employee’s immediate household. (It is understood that Bereavement Leave extends to similar members of a domestic partner’s family as detailed above, so long as the employee has an active “Declaration of Domestic Partnership” on file with Human Resources prior to the death).

Bereavement leave in excess of five (5) working days may be charged to Paid Days Off (PDO) with the approval of the Chief or Assistant Chief. In addition, the use of a maximum of five (5) PDO's shall be allowed for the bereavement of family members outside the immediate family.

The City reserves the right to require documentation of the death and/or any other time taken related to a death.

If any employee is on an approved leave of absence at the time of a death, they will be eligible for bereavement benefits if they are receiving at least fifty percent (50%) of their normal semi-monthly base pay from the City. Otherwise, the employee is not eligible for bereavement leave benefits.

Any observed holiday occurring during bereavement leave shall be paid as a holiday consistent with Articles 13 and 15 of this Collective Bargaining Agreement.

13.8 Washington Paid Family Medical Leave (PFML)

Guild members will pay the employee portion of the premium and the City will pay the employer portion ~~of~~fe the premium, as established by State law. PFML runs concurrently with FMLA.

ARTICLE 14. Sick Leave

14.1 *Sick Leave Accrual (Short-term Disability)*

A. Employees shall accrue ten (10) hours per month in a short-term disability leave account to a maximum accumulation of one thousand twenty-four (1024) hours. Use of this leave is available, as soon as the hours are earned in said bank. Sick leave hours accrued in a pay period cannot be used in the same period in which they are earned, i.e., sick hours accrued in the 1st through the 15th pay period cannot be used until the 16th through the end of the month pay period and so forth for illness or injury. Employees that have established prior eligibility under the LEOFF Act shall be covered by disability benefits provided by the LEOFF system.

14.2 *LEOFF II Time Loss Guarantee*

A. Duty Related Injury Leave

1. In lieu of the statutory supplement described in RCW 41.04.500 et seq., the City will supplement the time loss payments received by employees who have suffered on-the-job injuries as follows:
   a. The City will provide its supplement by paying the employee's base salary during a period of time loss. The City's supplement will begin on the first date an employee is entitled to time loss benefits under RCW, Title 51 and shall continue as long as the employee is receiving benefits under RCW, Title 51, up to a maximum of six (6) months from the first date of time loss.
   b. The six (6) month period that the City provides the LEOFF Supplement shall begin on the first day the employees receive the LEOFF Supplement, which may or may not coincide with the payment of time loss.
   c. The three-day waiting period is defined as the first three days after an employee's date of injury, not including the date of injury.
      (i) If an employee sees a medical provider during the statutory three-day waiting period after the date of injury, is determined to not be able to work as a result of their injury, and would not ordinarily be entitled to time loss during this period under L&I guidelines and/or RCW Title 51, then the employee will receive the LEOFF Supplement for hours missed on their date of injury and the three-day waiting period at their normal base rate.
      (ii) If time loss is paid pursuant to L&I guidelines and/or RCW Title 51 for the three-day waiting period after the date of injury, then the employee will receive the combination of time loss and the LEOFF Supplement for those days. The LEOFF Supplement will be paid for hours missed on the date of injury.
      (iii) If an employee does not seek medical treatment until after the three-day waiting period, then any time missed from work on the date of injury and those first three days

will be coded using their accrued sick leave.

d. Employees receiving City's time loss supplement must, within ten (10) business days of receipt, sign over to the City all time loss payment checks provided by the City's insurance administrator and/or the State.

e. Should the 6- months LEOFF supplement period end mid pay period, the employee will keep the entire time loss payment check and the City will deduct the difference in the final LEOFF supplement period time loss check amount from the employee's city payroll.

2. After this first six (6) month period, the supplement, up to their normal monthly salary, will be paid from the employee's available leave accruals.

3. Employee benefits including health and STD and PDO accruals will continue for the duration of the employee's employment.

B. Work-related disability shall be defined as:

(1) That which is eligible for payment of benefits under the state's Workers' Compensation program, excluding any disability which occurs during, and as a result of participation in, the basic police academy training program.

(2) That which is incurred while off duty, in response to a situation where such response is in accordance with departmental policy.

C. Employees disabled may be required to perform light duty work as assigned by the employer as provided under Worker's Compensation.

D. The parties expressly agree that the benefits provided by this article exceed the benefits under RCW 41.04.5000 et seq. ~~provided by Chapter 462, Laws of 1985 as allowed in section 11 of the Act.~~

E. In the event the Washington State legislature modifies the provisions of the LEOFF Act for LEOFF-II employees, this section shall be reopened for negotiations upon the request of either party.

14.3 **Sick Leave Pay Out Upon Death**. If the employee dies while employed by the City of Vancouver, the City will pay the beneficiary an amount equal to one hundred percent (100%) of the value of the employee's existing sick leave accrual balance up to a maximum of one thousand twenty-four (1024) hours.

14.4 **Sick Leave Sell Back Upon Retirement**. An employee separated from service due to retirement for disability or length of service retirement shall have their sick leave cashed out and deposited into the employee's HRA/VEBA account, with no employee election to receive the amount in cash, according to the following tiers:

- At the rate of twenty-five percent (25%) for hours 1 through 400;
- At the rate of thirty-five percent (35%) for hours 401 through 800; and
- At the rate of forty-five percent (45%) for the hours of 801 through 1,024.

For example: an employee with 900 hours of sick leave at retirement would receive an amount deposited into the employee's HRA/VEBA account, consisting of a 25% cash out of 400 hours (100 hours), plus a 35% cash out of 400 hours (140), plus a 45% cash out of 100 hours (45 hours), for a total of 285 sick leave hours.

ARTICLE 15. Holidays

15.1 The following days are recognized as "legal" holidays, for which time off is to be granted as provided for in Article 13 of this Agreement:

New Year's Day - January 1st
Martin Luther King Jr. Day - Third Monday in January
President's Day - Third Monday in February
Memorial Day - Last Monday in May
Juneteenth – June 19th
Independence Day - July 4th
Labor Day - First Monday in September
Thanksgiving Day - Fourth Thursday in November
The day immediately following Thanksgiving Day
Christmas Day - December 25th

15.2 *In Lieu of Holiday Pay - History*

When the paid days off (PDO) concept was introduced, it eliminated the obligation of the Employer to pay overtime for holidays worked. Two and four-tenths percent (2.4%) of the base rate was added to all classifications as compensation for an "in lieu of pay for holiday time."

A. Effective January 1, 2000, the parties agreed to eliminate the two and four-tenths percent (2.4%) in lieu of pay and added it to the differential component, as outlined in Article 12.2(A)(a)(iii) to this Agreement.

B. Effective January 1, 2023, the parties agreed to include Juneteenth as a recognized "legal" holiday, and increased the differential component of "in lieu of pay for holiday time" to two and seven-tenths percent (2.7%).

ARTICLE 16. Employee Insurance

16.1 **Life Insurance.** Each employee shall receive a term life insurance policy in the amount of one times (1X's) their annual salary, rounded to the nearest thousand dollars ($1000.00), double indemnity, which premium will be paid by the Employer.

16.2 **Health Insurance.**
Effective November 10, 2025, VCG moves to the 2026 Plan Design and amounts as part of this agreement and as set forth below.

A. Employees and their eligible dependents will have the option of selecting any combination of medical and dental coverage from the following:

~~a. **Medical**~~
~~i. HMO Plan~~
~~ii. HMO Plan – CDHP (Consumer Driven Health Plan)~~
~~iii. PPO Plan~~
~~iv. PPO Plan – CDHP (Consumer Drive Health Plan)~~
~~b. **Dental**~~
~~i. PPO Plan~~
~~ii. HMO Plan~~

a. **Medical**

i. **Option #1** Kaiser Traditional HMO

ii. **Option #2** Kaiser High-Deductible HMO

iii. **Option #3** Regence Traditional PPO

iv. **Option #4** Regence PPO High-Deductible

b. Dental

i. Option #1 Delta Dental

ii. Option #2 Willamette Dental

iii. Option #3 Kaiser Dental HMO

c. Vision

i. Option # 1 VSP Vision (for Regence Plans)

ii. Option # 2 Included in Kaiser Medical Plans

B. **Consumer Driven Health Plans (CDHP).**

a. CDHP's will include a Health Savings Account (HSA).

i. The City will make an annual contribution in January to the Employee's HSA in the following amounts:

1. Employee-only coverage –Sixteen ~~Fifteen~~ hundred dollars ($1,~~5~~600)
2. Employee plus one (1) or more dependents – Three thousand-two-hundred dollars ($3,~~0~~200)

b. Employees may also contribute pre-tax dollars to their HSA up to the limits allowed by law.

In addition, members have an opt-out/cash-back option for eligible employees upon certification of other group coverage.

C. **Premiums.** Each employee with dependents will pay ten percent (10%) of the actual medical insurance premium cost for the employee's dependents per month on a pre-tax basis.

D. **Flexible Spending Account (FSA).**

a. For employees enrolled in a non-CDHP plan: Employees will have the option of participating in an FSA for reimbursable medical costs, dependent care costs, or premium sharing costs.

b. For employees enrolled in a CDHP plan: Employees will have the option of participating in an FSA for dependent care costs.

c. ~~For this contract period, the Employer will pay thirty-five dollars ($35.00) each month into an eligible member's flexible spending account, or deferred compensation account. Employees enrolled in the CDHP plans may direct the thirty-five dollars ($35.00) to a flexible spending dependent care account or a deferred compensation account. Effective January 1, 2024, Article 16 Section16.2(D)(c) is discontinued in exchange for increase to deferred compensation match in Article 18.~~

16.3 Employer has the right to select insurance carrier(s), provided, however, that at least two medical plans will be offered and that the aggregate schedule of benefits currently enjoyed will not be substantially changed.

16.4 The Employer shall provide liability insurance (or self-insurance) for Guild employees. Such insurance shall defend and indemnify employees against allegations arising from all acts or omissions occurring within the scope of the duties and responsibilities of the employee's employment. Such insurance or self-insurance shall also cover all costs, including attorney's fees, connected with proposed or threatened suits and negotiated settlements, provided that the City need not indemnify or defend the employee for any act found by the Department to be dishonest, fraudulent, criminal or malicious, or for any suit brought against the employee by or on behalf of the City.

16.5 HRA/VEBA. The City will administer a qualified HRA/VEBA account for each employee. In the event of a change, the City agrees to bargain the impacts of the selected VEBA program/vendor prior to implementation of the change. Effective January 1, 2026, the City will deposit an amount equivalent to three quarters percent (0.75%) of the employee's base salary per month to each employee's HRA/VEBA account. Effective January 1, 2027, the City will deposit an amount equivalent to an additional one-quarter percent (0.25%) of base salary for a total of one percent (1.0 %) of the employee's base salary per month to each employee's HRA/VEBA account. Effective January 1, 2028, the City will deposit an additional amount equivalent to one-half percent (0.5%) for a total of one and one half percent (1.5%) of the employee's base salary per month to each employee's HRA/VEBA account. The employee's HRA/VEBA account is owned by the employee, portable after separation, and usable both while actively employed and in retirement.

Bargaining Note: This proposal is in conjunction with the medical/benefits settlement and this package for 2025 and 2026 moving forward.

ARTICLE 17. Medical Examinations

17.1 The Employer has the right to require periodic medical examinations (physical and psychological) of all employees covered by this Agreement provided the examination is job related and consistent with business necessity. The Employer also has the right to require certification from a physician that an employee is physically and mentally able to return to work following a period of disability leave.

ARTICLE 18. Deferred Compensation

18.1 Employees may participate, at their option and cost, in the deferred compensation programs identified by the City (with at least two programs offered). In the event of a change, the City agrees to bargain the impacts of the selected program/vendors prior to implementation of the change. ~~provided by either ICMA Retirement Corporation and/or Voya, or any other plans the City may provid~~e.

18.2 ~~The City will match, up to a maximum of one percent (1.0%) of the employee's base salary, an employee's contribution to the deferred compensation program(s) offered by the City, such contributions subject to Internal Revenue Service (IRS) limitations.~~ Effective January 1, 2026~~3~~4, the City will match, up to a maximum of ~~two~~ three and one half percent (2~~3~~.5%) of the employee's base salary, an employee's contribution to the deferred compensation program(s) offered by the City, such contribution subject to the Internal Revenue Service (IRS) limitations.

ARTICLE 19. Tuition Assistance

19.1 Requests for tuition assistance to attend specialized individual training or academic training shall be processed in accordance with City policy.

ARTICLE 20. Clothing Allowance

20.1 The Employer shall purchase and replace such clothing, uniforms, and other equipment as designated by the Chief of Police or Assistant Chief, and shall make all necessary uniform replacement as the need arises. Employees shall be paid an annual allowance for clothing purchases of six hundred dollars ($600.00).

A. For employees newly hired (not promoted) mid-year, they will receive a pro-rated amount based upon their month of hire.

a. e.g. newly hired in July = six (6) months of service equates to a three hundred dollar ($300.00) payment ($600.00/12 = $50.00 per month -- $50.00 x 6 months = $300.00)

B. For employees promoted into the Guild mid-year, they will receive any difference in allowance between the Union and the Guild.

a. e.g. If the Guild has a five hundred fifty dollars ($550.00) allowance, the promoted employee will receive fifty dollars ($50.00) – ($600.00-$550.00 = $50.00)

20.2 Employees agree to maintain all clothing and equipment in good condition and not subject it to abuse beyond the regular call of duty.

20.3 The Employer shall provide for each employee a standard service side arm and a standard set of handcuffs which the employee will maintain and return to the Employer upon the termination of ~~his~~ the employee's service. The Employer shall determine the standard service side arm and handcuffs to be provided. If the employee chooses to carry other than the issued sidearm, the employee will return the issued sidearm when authorized to carry an alternative sidearm.

20.4 The City will repair or replace eye glasses and/ or authorized personal items damaged or destroyed beyond normal wear and tear while on duty. The employee shall assist the Employer in securing restitution or indemnification through the courts by the Employer. It is not the intent of this Article to compensate for an employee's negligence and/or carelessness.

ARTICLE 21. Annexation

21.1 It is understood and agreed that in the event of an annexation to the City of Vancouver requiring a transition period, the City may subcontract police services providing such activity does not result in the layoff of bargaining unit employees or a reduction of employees or positions within the bargaining unit. This transition period shall be for a reasonable period in order to permit the orderly and safe transition of police services to the annexed area.

21.2 It is further agreed that should the City hire Law Enforcement Officers laid off from another jurisdiction which is enveloped in the

annexation, such Law Enforcement Officers shall have their length of service in the other jurisdiction applied toward their seniority with the City for lay off purposes, provided they are laid off by inverse seniority as contemplated by RCW 35.13.360-400 (1993 c 189 sections 2-6).

ARTICLE 22. Educational Incentives ~~- History~~

~~22.1 In the 2000-2002 Agreement, the parties agreed that previously an educational incentive was in the form of a qualification requirement for the ranks of Lieutenant and Commander, but with the new requirement that a Bachelor's degree was required to be a Lieutenant or Commander, the parties eliminated the existing educational incentive program and added the five percent (5%) to the differential component as outlined in Article 12.2(A)(a)(ii) to this Agreement.~~

22.1 General Eligibility

Current active employees holding the rank of Lieutenant and Commander may participate, if eligible, in the incentive program as described in the following sections of this Article. Benefits payable under the incentive program cease when an employee terminates, retires, or is on an extended leave of absence without pay for more than thirty (30) consecutive calendar days. Such benefits shall cease effective on the date of termination or retirement; or, in the case of extended leave of absence without pay, on the thirty-first day of absence. Pay will be reinstituted effective on the first day of the month next following the employee's return to work.

A. To receive the second year award of 2.5% of base pay/month, the employee must:

(1) Have an associate degree from an accredited college or university in an eligible course of study; or

(2) Have completed 92 quarter hours or 54 semester hours and be currently enrolled in a bachelor's degree program at an accredited college or university in an eligible course of study.

To maintain eligibility for a second year award, an employee enrolled in a bachelor's degree program must furnish to the police chief and human resources director a copy of the official grade report at the end of each quarter or semester and must keep them

apprised, in writing, of any circumstances which affect eligibility for educational incentive.

If the employer directs the employee to a work or training assignment that requires the employee to temporarily withdraw from school, payments shall continue under the educational incentive program during such assignment, provided the employee must re-enroll in school at the beginning of the quarter following termination of such assignment. If re-enrollment does not occur, benefits paid beyond the date such assignment ended shall be repaid to the city by the employee.

B. To receive the fourth year award of 5% of base pay/month the employee must:

(1) Have a bachelor's degree from an accredited college or university in an eligible course of study.

(2) It is the employee's responsibility to assure that timely documentation of educational attainment is provided to the Office of the Chief in the form of an official college transcript or degree or both. Payment of incentive awards will begin effective the first day of the payroll period following the date such documentation is provided.

C. Only courses taken through schools accredited by or through the Council for Higher Education Accreditation (CHEA) will be accepted in determining eligibility for educational incentive.

D. The employee's degree must be job-related or contribute to improved performance.

E. Questions arising out of the administration of this program will be resolved by a committee consisting of the police chief and human resources director; however, this will not prevent an employee from seeking redress through the grievance procedure.

The parties agree that all employees employed in the position of Lieutenant or Commander on January 1, 2026, have met the requirements described above and shall receive the 5% of base pay/month.

ARTICLE 23. Resolution of Disputes

23.1 For purposes of this Agreement, the term “grievance” means any dispute between the Employer, on the one hand, and the Guild or an employee on the other, concerning the interpretation, application or alleged violation of any term of this Agreement. For purposes of this Article, the term “employee” shall include both members of the bargaining unit and the Guild. The parties agree to make every effort to settle grievances at the earliest step possible.

23.2 *Grievance Procedure*

Grievances shall be processed in accordance with the following procedure:

Grievances shall be presented in writing by the employee to their first level supervisor outside of the bargaining unit within twenty-one (21) calendar days of the date of the alleged violation of the Agreement.

The written grievance shall include the following information:

A. A description of the grievance and how the employee(s) was/were adversely affected.

B. A statement of the section(s) of the Agreement allegedly violated and the nature of the violation.

C. The date of the incident(s) grieved.

D. A description of the remedy sought by the employee(s).

E. Identify the employees affected.

F. Specification of the step at which the grievance procedure should begin

(a) For a grievance that involves discipline imposed by the Chief, the grievance shall be initiated at Step 2.

(b) For any other grievance, the grievance shall be initiated at Step 1

The written grievance shall be signed by the employee.

Step 1: The parties will use an interest based problem solving process to resolve the issues identified in the grievance. The process will include all individuals necessary and with authority to reach a resolution. Any resolution of the grievance will be in writing and signed by the parties. If the parties agree that they are unable to resolve the grievance, the parties will outline the areas of disagreement in a memorandum. The employee may advance the grievance to the next step by delivering the memorandum to the Office of the Chief at any time within twenty-one (21) calendar days of filing the grievance. If the grievance is not resolved in twenty-one (21) calendar days, the grievance will automatically advance to Step 2.

Step 2: If the grievance remains unresolved following step 1, the Chief of Police may meet with the employee and their Guild Representative. The Chief shall make a decision on the grievance, in writing, within twenty-one (21) calendar days of receipt of the grievance.

Copies of the Chief's decision shall be mailed, emailed or delivered to the employee and to the Guild.

If the grievance involves a termination of employment, the employee may advance the grievance to Step 3. For all other grievances, the grievance may be advanced to Step 4.

Step 3: If the grievance remains unresolved after the Chief's decision is rendered in Step 2, the employee may deliver the grievance in writing to the City Manager or their designated representative, with a copy to the Chief, within fourteen (14) calendar days after receipt of the decision reached by the Chief in Step 2. The City Manager or their designee may meet with the employee and Guild representative, the Chief of Police, and other directly involved individuals as determined by the City Manager or designee to be appropriate. The City Manager or their designee shall render their decision, in writing, within sixty (60) calendar days of receipt of the grievance. The City Manager or their designee shall mail, email or deliver copies of their decision to the employee, the Guild, and the Chief of Police.

Step 4: If the grievance remains unresolved after the decision is rendered in Step 2 or Step 3, as applicable, the Guild shall decide whether the final

Step in the grievance procedure will be arbitration or civil service appeal. The Guild will provide the City with a written notice electing a final step within fourteen (14) calendar days after the mailing, emailing or hand delivery of the decision.

23.3 Unless otherwise agreed by the parties, challenges to the procedural arbitrability of a grievance will be resolved in a proceeding separate from and prior to arbitration on the merits of the grievance. Within fourteen (14) calendar days following receipt of an Arbitrator's decision ruling that a challenged grievance is subject to arbitration, the parties will begin the process described below to select an arbitrator to rule on the merits of the grievance.

23.4 If the grievance is submitted to arbitration, the parties shall attempt to mutually agree on a disinterested third party to serve as Arbitrator. In the event the Employer and the Guild are unable to agree on an Arbitrator; the Arbitrator shall be selected by the process of elimination from a panel of seven (7) arbitrators furnished by the Public Employment Relations Commission (PERC) or the Federal Mediation and Conciliation Service (FMCS). The request to PERC or FMCS shall state the general nature of the issues raised by the grievance and ask that the nominees be qualified. The parties shall promptly strike from the list received. The first strike shall be determined by the toss of a coin. The decision whether to use PERC or FCMS will be by mutual agreement or determined by a toss of the coin.

23.5 The Arbitrator shall consider and decide only the specific issue(s) submitted by the Employer and/or the Guild at the hearing, and shall have no authority to make a decision on any other issue not so submitted. The Arbitrator shall have jurisdiction and authority only to interpret, apply or determine compliance with the specific terms of the Agreement and shall not have jurisdiction to add to, detract from, or alter in any way, the provisions of this Agreement. A decision within the jurisdiction of the Arbitrator shall be final and binding upon all parties. The expenses and fees incumbent to the services of the arbitrator shall be paid by the losing party. Each party shall be responsible for compensating its own representatives and witnesses. Either party may cause a verbatim recording of the hearing to be made, provided it pays the cost of the record. If the other party desires a copy, the cost of the recording and preparation of a transcript shall be shared equally.

23.6 A grievance that involves or affects a significant number of the employees in the bargaining unit may be introduced by the Guild in written form to the Chief of Police as set forth in Step 2 of the grievance procedure.

23.7 Failure by the grievant(s), or a Guild Representative, to advance the grievance within time limits stipulated in this Article shall constitute abandonment of the grievance. The parties may mutually agree in writing to extend the time limit for a given Step for a stated period of time. Failure by the Employer to reply in a timely manner constitutes a denial of the grievance, unless both parties have agreed to an extension of the time line.

ARTICLE 24. Employee Discipline/Termination

24.1 It is hereby recognized and agreed that the Employer has the right to discipline an employee for reasonable and just cause.

24.2 The Employer may use a written warning in lieu of disciplinary action to advise the employee of inappropriate conduct, or of violation of rules. Written warnings shall be placed in the employee's personnel file for a period not to exceed twelve (12) months. An employee may request that the warning letter be reviewed by the Chief of Police after six (6) months for possible removal at that time.

24.3 The Employer may take disciplinary action by written reprimand, suspension, demotion, or discharge. Employees shall be given an opportunity to review and comment upon all disciplinary letters that are placed in their personnel files. The employee shall be requested to sign the disciplinary letter. The signature thereon shall not be construed as admission of guilt or concurrence with the disciplinary action, but rather as an indication that the employee has seen and comprehends the nature of the disciplinary action.

24.4 Copies of all letters of warning or disciplinary action shall be given to the employee at the time the action is taken or shortly thereafter, and notice of such action shall be forwarded to the Guild.

24.5 An employee suspended without pay may request to forfeit accrued paid days off on a day for a day basis, in lieu of unpaid time off. Substitution of PDO for unpaid time in no way reduces the level of discipline from a suspension.

ARTICLE 25. Non-Reduction of Wages and Working Conditions

25.1 The parties hereto agree that the wages and working conditions in effect and now being paid to and enjoyed by the members of the Guild shall be those ratified by both parties signatory to this Agreement and shall not be

reduced in view of the provisions of this Agreement. Nothing in this Article shall be construed to limit in any way the Employer's rights under Article 3 - Rights of Management of this Agreement.

25.2 The Employer and the Guild agree that past practices that are mandatory subjects of bargaining and are not specified by this Agreement but known by both the Guild and the Employer shall remain unchanged, unless bargained to completion consistent with RCW 41.56.

ARTICLE 26. Conflict of Contract and Personnel Policies

26.1 It is agreed that the intent of the parties is that this Agreement and all working agreements shall be consistent with the personnel policies. Where it is found that the provisions of such an agreement are in conflict with the personnel policies, the provisions of this Agreement shall apply.

ARTICLE 27. Separability

27.1 If any article of this Agreement should be held invalid by operation of law or by any tribunal of competent jurisdiction or if compliance with or enforcement of any article should be restrained by such tribunal, the remainder of this Agreement shall not be affected thereby and the parties shall enter into immediate collective bargaining negotiations for the purpose of arriving at a mutually satisfactory replacement for such article.

ARTICLE 28. Fair Labor Standards Act

28.1 In the event of changes in the application of the Fair Labor Standards Act to State and local governments or in the Federal Government implementing regulations which impact upon the provisions of this Agreement or the application thereof, the parties agree that such provisions are immediately subject to renegotiation upon the request of either party to this Agreement.

ARTICLE 29. Termination and Renewal

29.1 This agreement is effective January 1, 20263, and shall remain in full force and effect through December 31, 20285.

29.2 Pursuant to the provisions of RCW, Chapter 41.56, the employer and the Guild agree to commence negotiations not later than May 1 of the expiration year.

ARTICLE 30. Contract Amendments

30.1 The parties agree that this Agreement may be amended in writing as agreed to by both parties without action of their respective legislative bodies, unless otherwise specified herein, including, but not limited to, amendment by Memorandum of Understanding or Memorandum of Agreement.

APPENDIX A

VANCOUVER COMMAND GUILD

Rates of Pay

TABLES TO BE UPDATED BASED ON TENTATIVE AGREEMENT

Effective January 1, 20263

	STEP	STEP	STEP	STEP	STEP	STEP
RANK	1	2	3	4	5	6
LIEUTENANT		~~$ 11,089~~	~~$ 11,643~~	~~$ 12,226~~	~~$ 12,837~~	~~$ 13,479~~
COMMANDER		~~$ 12,199~~	~~$ 12,808~~	~~$ 13,449~~	~~$ 14,122~~	~~$ 14,828~~

Effective January 1, 20274

	STEP	STEP	STEP	STEP	STEP	STEP
RANK	1	2	3	4	5	6
LIEUTENANT		~~$ 11,533~~	~~$ 12,109~~	~~$ 12,715~~	~~$ 13,350~~	~~$ 14,018~~
COMMANDER		~~$ 12,687~~	~~$ 13,320~~	~~$ 13,987~~	~~$ 14,687~~	~~$ 15,421~~

Effective January 1, 20285

	STEP	STEP	STEP	STEP	STEP	STEP
RANK	1	2	3	4	5	6
LIEUTENANT		~~$ 11,994~~	~~$ 12,593~~	~~$ 13,223~~	~~$ 13,884~~	~~$ 14,579~~

COMMANDER	~~$ 13,194~~	~~$ 13,853~~	~~$ 14,547~~	~~$ 15,274~~	~~$ 16,038~~

DATED this _____ day of _____, 2026~~3~~.

For the Employer: **For the Guild:**

_____ _____

~~Eric Holmes~~ Lon Pluckhan, City Manager Blaise Geddry, VCG President

_____

~~Lisa Takach~~ Antoinette Gasbarre, HR Director

Approved as to form:

_____

~~Jonathan Young~~ Nena Cook, City Attorney

Attest:

_____

~~Natasha Ramras~~ Lisa Brandl~~Anthony Glenn~~, City Clerk

A RESOLUTION relating to temporary shelter; providing for adoption of an increased funding award and timeline extension for the 2025 Share WHAT Shelter and YWCA SafeChoice Shelter agreements and authorizing the City Manager to execute agreements and other related documents and disburse funds in accordance with those agreements on behalf of the City of Vancouver consistent with the Affordable Housing Fund Council-approved funding awards.

Staff Report: 111-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
2025 Affordable Housing Fund Temporary Shelter Contract Extensions

Key Points

- In June 2025, the City opened Affordable Housing Fund (AHF) shelter applications. The City received two applications and awarded both applicants $300,000 each: Share WHAT Women's Shelter (18 beds) and YWCA SafeChoice Shelter (44 beds).
- Current shelter contracts run on inconsistent schedules: YWCA on a July–June cycle and Share on a November–October cycle, complicating reporting and advisory committee review. The proposed amendments would align both contracts to a calendar year (ending December 31, 2026).
- To achieve this alignment, YWCA SafeChoice Shelter would receive a 6-month contract extension and an additional $150,000 and Share WHAT Shelter would receive a 2-month contract extension and an additional $50,000.
- Share and YWCA are the only shelter providers who have requested AHF funding since 2022. This additional allocation does not displace other shelter providers.

Strategic Plan Alignment
Housing and Human Needs – meeting basic needs and partnering with organizations to support the community

Present Situation
In April 2025, the City released $600,000 in Affordable Housing Funds to support partner-operated shelters. Two applications were received and reviewed by the Housing Advisory Committee at its May 9, 2025, meeting. Share submitted a request for $425,000 to support its Women's Housing and Transition (WHAT) shelter, which provides 18 beds and serves approximately 40 women annually. The YWCA requested $400,000 for its SafeChoice Domestic Violence Shelter, which offers 44 beds and serves about 100 individuals per year. Both agencies have a strong track record with shelter operations and have successfully managed previous AHF awards. The Committee recommended, and Council approved awarding $300,000 to each shelter.

The City's AHF shelter contracts were originally structured to align with the HUD Program Year, running July through June. In 2024, Share requested a contract extension to allow additional time to spend down awarded funds, which shifted their contract period to a November through October cycle.

As a result, the City's two shelter providers now operate on different contract schedules, creating challenges for both quarterly and annual reporting. Since reporting periods do not align with either contract cycle, reporting must be manually reconciled, and advisory committee reviews cannot easily evaluate both programs side by side within the same timeframe. The proposed contract amendments would bring both shelter contracts into alignment on a calendar year schedule, with both contracts ending December 31, 2026. Going forward, the City will issue AHF shelter contracts on a calendar year basis only and will not offer contract extensions for the purpose of spending down funds; shelter operators will be expected to complete program activities and expend awarded funds within the contract period.

Staff proposed these contract extensions and the additional allocation of funds for the two shelter operators to the Housing Advisory Committee, who agreed with the recommendation.

YWCA would receive an additional $150,000 for a 6-month extension and Share would receive an additional $50,000 for a 2-month extension. These amounts are proportionate to the original contract amount and for a contract end date of December 31, 2026.

The additional funding allocated through these contract amendments will not impact the availability of future AHF shelter funds. The $200,000 in additional funding is drawn from unallocated 2024 AHF shelter funding and does not reduce or commit any current or future funding cycles. Future AHF shelter funding will remain fully available for allocation through the standard application and award process.

Advantage(s)

1. An extended program timeline will provide continued shelter support through December 31, 2026, ensuring no gap in services for residents experiencing homelessness.
2. Aligning both shelter contracts to a calendar year cycle will streamline AHF reporting and advisory committee review and establish a consistent contracting schedule for future funding cycles.

Challenge(s)

None

Budget Impact

The additional proposed allocation of $200,000 is provided by Affordable Housing Fund revenues.

Prior Council Review

June 9, 2025: 2025 AHF Temporary Shelter Funding Awards

Action Requested

On Monday, June 1, 2026, finalize and approve the resolution of the 2025 Affordable Housing Fund Temporary Shelter contract amendments, authorizing the City Manager, or designee, to execute agreements and other related documents and disburse funds in accordance with those agreements on behalf of the City of Vancouver consistent with the Affordable Housing Fund 2025 Council-approved contract funding increase and timeline extension.

Staff Contact

Kimberly Kerlee, Senior Support Specialist, Samantha Whitley, Housing Programs Manager, kimberly.kerlee@cityofvancouver.us, samantha.whitley@cityofvancouver.us

Attachments:

1. Resolution

6/1/2026

RESOLUTION NO. M- [Resolution Number]

A RESOLUTION relating to temporary shelter; providing for adoption of an increased funding award and timeline extension for the 2025 Share WHAT Shelter and YWCA SafeChoice Shelter agreements and authorizing the City Manager to execute agreements and other related documents and disburse funds in accordance with those agreements on behalf of the City of Vancouver consistent with the Affordable Housing Fund Council-approved funding awards.

WHEREAS, in June 2016 Council adopted, by resolution, the Affordable Housing Fund Administrative and Financial Plan (A & F Plan) and most recently updated the A & F Plan in December 2024, and

WHEREAS, the City received only two (2) applications for Temporary Shelter through the 2025 Affordable Housing Fund application process, and

WHEREAS, the City awarded both applicants $300,000 each for shelters operated by Share and YWCA, totaling $600,000, and

WHEREAS, the housing advisory committee and staff recommend a contract extension and increased funding for the two (2) shelters to align them on a calendar year period, and

WHEREAS, YWCA would receive an additional $150,000 for a 6-month contract extension and Share would receive an additional $50,000 for a 2-month contract extension, and

WHEREAS, this extended program timeline will allow Share to serve an additional 13 individuals and YWCA will serve an additional 50 individuals, and

WHEREAS aligning contract timelines with a calendar year period will increase consistency and efficiency for AHF applications and reporting.

NOW, THEREFORE,

BE IT RESOLVED BY THE CITY OF VANCOUVER:

Section 1. **Findings**. The City Council adopts the above recitals and the information in SR_____ as findings supporting City Council in adopting this resolution.

Section 2. **Amendment.** The 2025 Affordable Housing Fund award that was made to Share for the WHAT Shelter in the amount of $300,000 is hereby increased to $350,000 with the contract end date extended from October 31, 2026 to December 31, 2026, and the 2025 Affordable Housing Fund award that was made to YWCA for the SafeChoice Shelter in the amount of $300,000 is hereby increased to $450,000 with the contract end date extended from June 30, 2026 to December 31, 2026.

Section 3. **Severability.** If any section, sentence, clause or phrase of this resolution should be held to be invalid or unconstitutional by a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause or phrase of this resolution.

Section 4. The City Manager or designee is hereby authorized to execute agreements and other related documents and disburse funds in accordance with those agreements on behalf of the City of Vancouver consistent with Affordable Housing Fund 2025 Council-approved contract funding increase and timeline extension.

Section 5. Effective Date. This resolution is effective immediately after final adoption.

ADOPTED at a Regular Meeting of the Vancouver City Council this 1st day, of June 2026.

_____

Anne McEnerny-Ogle, Mayor

Attest:

_____

Lisa Brandl, City Clerk

Approved as to form:

_____

Nena Cook, City Attorney

A RESOLUTION authorizing the City of Vancouver to apply for a Heritage Capital Projects grant from the Washington State Historical Society to fund rehabilitation of four buildings on Officers Row; providing for severability and an effective date.

Staff Report: 112-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
Washington State Historic Society Heritage Capital Projects Grant

Key Points

- The City is interested in applying for a Heritage Capital Projects grant through the Washington State Historic Society (WSHS) to support preservation work needed on four buildings on Officers Row.
- The grant requires a 2-to-1 match and funds are available in the Vancouver National Historic Reserve (VNHR) capital fund for this project.
- The grant program requires a City Council resolution demonstrating support for the project as part of the grant application process.

Strategic Plan Alignment
Culture and Heritage – celebrating culture and heritage

Present Situation
For the last twenty years, the City and the Historic Trust have worked collaboratively to identify strategic rehabilitation projects to maintain the historic buildings in the VNHR, including Officers Row and the West Reserve area. In many of these projects, we have been successful at leveraging funding through WSHS targeted to historic preservation to support this work. Recent projects include the Grant House, completed in 2023, and the O. O. Howard House, completed last year.

The City and Trust have identified needed repairs to four buildings on Officers Row as the next priority project that would benefit from Heritage Capital Project dollars. The buildings involved are known as 3, 4, 12 and 18. Work will address some exterior wall deterioration and needed replacement of beams that show signs of deterioration. The project will provide better weather protection to avoid similar issues in the future. The total project cost estimate for this work is $387,000. This would allow a grant request of $129,000 with a required match of $258,000. Fund balance is available in the VNHR capital reserve to support this project.

Finalization of plans and refinement of costs is occurring now and a contract for construction would come to City Council in a separate action if this grant is received.

Advantage(s)

1. This grant would provide funding to preserve the historic buildings owned by the City of

Vancouver on Officers Row.
2. WSHS administration of the program ensures that appropriate methods are used to meet or exceed historic preservation standards.

Challenge(s)
This project requires a 2-to-1 match; however, these funds are available for this purpose in the historic reserve capital fund.

Budget Impact
Funds are available to support the project in the dedicated VNHR capital fund.

Prior Council Review
None

Action Requested
On June 1, 2026, adopt a resolution supporting the City applying for a 2027-2029 Heritage Capital Projects grant from Washington State Historic Society to support structural preservation of Officers Row buildings 3, 4, 12, and 18.

Staff Contact
David Perlick, Director of Parks, Recreation and Cultural Services, david.perlick@cityofvancouver.us

Attachments:
1. Resolution

06/01/26

RESOLUTION NO. M-_____

A RESOLUTION authorizing the City of Vancouver to apply for a Heritage Capital Projects grant from the Washington State Historical Society to fund rehabilitation of four buildings on Officers Row; providing for severability and an effective date.

WHEREAS, the City of Vancouver owns Officers Row which includes twenty-two historic structures that are part of the Vancouver National Historic Reserve, a federally designated national historic site; and

WHEREAS, the City of Vancouver is interested in applying for a Heritage Capital Projects grant from the Washington State Historical Society to support critical structural preservation of Officers Row buildings 3, 4, 12, and 18; and

WHEREAS, this project would address newly discovered areas of deterioration and water damage, and ensure that these buildings are preserved and continue to fully contribute to the living history of Officers Row; and

WHEREAS, the Washington State Historical Society offers a recurring competitive grant program (RCW 27.34.330 Heritage Capital Projects) to support capital needs of facilities that interpret and preserve Washington's heritage; and

WHEREAS, through the Heritage Capital Projects grant program, the State of Washington may reimburse up to 33.33% of total project costs and requires a 2-to-1 financial match.

NOW, THEREFORE,

BE IT RESOLVED BY THE CITY OF VANCOUVER:

Section 1. The recitals set forth above are adopted as findings supporting the action of the City Council in adopting this resolution.

Section 2. The City Council fully endorses and supports the structural preservation of Officers Row buildings 3, 4, 12, and 18 and authorizes the City of Vancouver to apply for project funding through a Heritage Capital Projects grant from the Washington State Historical Society with a committed city match estimated to be $258,000.

Section 3. If any section, sentence, clause or phrase of this resolution should be held to be invalid or unconstitutional by a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause or phrase of this resolution.

Section 4. This resolution shall be effective immediately upon adoption.

DATED this 1st day of June, 2026.

_____
Anne McEnerny-Ogle, Mayor

Attest:

_____
Lisa Brandl, City Clerk

Approved as to form:

_____
Nena Cook, City Attorney

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject
Approval of the Claim Vouchers

Action Requested
Approve claim vouchers for June 1, 2026.

Attachments:
1. 08_06.01.26claims

Voucher Approval Summary - City of Vancouver

This sheet summarizes the voucher totals submitted for Council approval for the reporting period shown below.

We, the undersigned Council Members of the City of Vancouver, Clark County, Washington, hereby certify that the merchandise or services hereinafter specified have been received and that the vouchers listed below are approved for payment in the amount of:

Total Amount Approved: $ 22,229,364.48

On Council Meeting Date: Monday, June 1, 2026

Mayor _____

Council Member _____

Council Member _____

Auditing Officer Cyndi A. Turner

Reporting Period	Payment Categories	Payment Categories Total
May 11, 2026 - May 24, 2026	Accounts Payable Checks (See Attached)	$ 17,102,055.78
May 11, 2026 - May 24, 2026	Hansen City Payments (See Attached)	12,626.71
May 11, 2026 - May 24, 2026	Visa Refunds (See Attached)	2,955.90
May 11, 2026 - May 24, 2026	Payroll Checks (See Attached)	5,111,726.09
	TOTAL	**$ 22,229,364.48**

This information is structured for accessibility and screen navigation.

INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Ad Hoc Payment	Check	31160	5/13/2026	193.44	Adams,Sharlene or Damieon	615 NE 157TH AVE ,VANCOUVER,WA,98684
Ad Hoc Payment	Check	31161	5/13/2026	40.83	Alecsander or Jennifer Thompson	3907 NE 133RD AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31162	5/13/2026	146.33	Andrea Kristof or Tamar Baber	1463 SE COLUMBIA WAY ,VANCOUVER,WA,98661
Ad Hoc Payment	Check	31163	5/13/2026	43.04	B L K Capital Llc	12306 NE 107TH WAY ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31164	5/13/2026	210.62	Cornelius,Dale or Hillary	1812 SE 182ND PL ,VANCOUVER,WA,98683
Ad Hoc Payment	Check	31165	5/13/2026	314.27	Dawson,Brian or Christina	3914 I ST ,VANCOUVER,WA,98663
Ad Hoc Payment	Check	31166	5/13/2026	151.23	DMK Homes Inc	14217 NE 42ND CIR ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31167	5/13/2026	118.83	Dolan or Sarah Gish	1020 SE 130TH AVE ,VANCOUVER,WA,98683
Ad Hoc Payment	Check	31168	5/13/2026	221.20	Edgar Garcia or Ryan Bautista	7012 LOUISIANA DR ,VANCOUVER,WA,98664
Ad Hoc Payment	Check	31169	5/13/2026	165.00	Ehrgott,Rosemarie	4212 NE 152ND AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31170	5/13/2026	220.07	Hadfield,Michael or Jennifer	10702 NE 107TH WAY ,VANCOUVER,WA,98662
Ad Hoc Payment	Check	31171	5/13/2026	191.19	Inderjit Kaur or Jaswinder Singh	9503 NE 165TH AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31172	5/13/2026	132.52	Ines Alba De Pablo	10709 SE 11TH CIR ,VANCOUVER,WA,98664
Ad Hoc Payment	Check	31173	5/13/2026	12.86	Mary Kathleen Finley or Carl Edward Holden	17410 NE STONEY MEADOWS DR ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31174	5/13/2026	338.59	Mason Home Remodel, Llc	8812 NE 58TH ST ,VANCOUVER,WA,98662
Ad Hoc Payment	Check	31175	5/13/2026	225.58	Moody,Malinda	4714 NE 126TH AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31176	5/13/2026	221.89	Nancy Mathias or James Kopetski	13210 SE 7TH ST ,VANCOUVER,WA,98683
Ad Hoc Payment	Check	31177	5/13/2026	90.16	OD Labs Property	7808 NE 62ND ST ,VANCOUVER,WA,98662
Ad Hoc Payment	Check	31178	5/13/2026	144.51	OD Labs Property	313 NE 52ND ST ,VANCOUVER,WA,98663
Ad Hoc Payment	Check	31179	5/13/2026	58.06	Patrick Plumb or Irvin Torres	4020 NE 165TH AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31180	5/13/2026	86.77	Sean R Warner II or Mikayla R Ballard	10418 NE 66TH ST ,VANCOUVER,WA,98662
Ad Hoc Payment	Check	31181	5/13/2026	193.28	Shaw,Cherry or Edward	14316 SE 29TH CIR ,VANCOUVER,WA,98683
Ad Hoc Payment	Check	31182	5/13/2026	359.98	Smith,Jan or William	9508 NE 163RD AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31183	5/13/2026	56.55	Snow,Karen or David	2907 E 24TH ST ,VANCOUVER,WA,98661

*Please contact Procurement Services if you would like to review the justification for EMERGENCY procurement.

INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Ad Hoc Payment	Check	31184	5/13/2026	244.00	Tao Zhou or Steven Lu	17302 NE 2ND LOOP ,VANCOUVER,WA,98684
Ad Hoc Payment	Check	31185	5/13/2026	155.86	Tapani Inc	2323 GENERAL ANDERSON ,VANCOUVER,WA,98660
Ad Hoc Payment	Check	31186	5/13/2026	127.10	Tina or Brian Andrews	1714 E 29TH ST ,VANCOUVER,WA,98663
Ad Hoc Payment	Check	31187	5/13/2026	30.02	Valencia,Paul	4000 NE 109TH AVE ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31188	5/13/2026	721.00	Wells,Billy or Loretta	5420 NE FOURTH PLAIN BLVD ,VANCOUVER,WA,98661
Supplier Payment	Check	31189	5/13/2026	750.00	Albert Collier	
Supplier Payment	Check	31190	5/13/2026	3,472.00	Allegis Group Holdings Inc - Remit-To: TekSystems Inc - Atlanta	
Supplier Payment	Check	31191	5/13/2026	1,500.00	American Planning Association Washington	
Supplier Payment	Check	31192	5/13/2026	6,750.00	Baynard Cooke Law PLLC	
Supplier Payment	Check	31193	5/13/2026	5,308.00	Cascade Inn	
Supplier Payment	Check	31194	5/13/2026	21,129.40	Cellco Partnership - Remit-To: Cellco - Dallas	
Supplier Payment	Check	31195	5/13/2026	1,290.00	City Bark & Recycling LLC	
Supplier Payment	Check	31196	5/13/2026	234,947.82	Clark County - Remit-To: Clark County - Treasurer Vancouver	
Supplier Payment	Check	31197	5/13/2026	1,147.80	Clark County Title Company - Remit-To: Clark County - Reconveyance Fees	
Supplier Payment	Check	31198	5/13/2026	72,421.00	Clary Longview LLC	
Supplier Payment	Check	31199	5/13/2026	7,800.00	Concord Adult Care Home, LLC	
Supplier Payment	Check	31200	5/13/2026	1,358.14	Core and Main LP - Remit-To: Core and Main LP	
Supplier Payment	Check	31201	5/13/2026	3,696.85	CUES Inc - Remit-To: CUES Inc - Cincinnati	
Supplier Payment	Check	31202	5/13/2026	545.00	CyberSource Corporation - Remit-To: CyberSource - Los Angeles	
Supplier Payment	Check	31203	5/13/2026	1,876.03	Fire, Health & Safety Equipment Co., Inc	
Supplier Payment	Check	31204	5/13/2026	7,500.00	Gerrick Weakley	
Supplier Payment	Check	31205	5/13/2026	52,329.93	Grade Werks Excavating LLC	
Supplier Payment	Check	31206	5/13/2026	6,556.25	Groundwater Solutions, Inc.	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Check	31207	5/13/2026	57,477.41	Harper Houf Peterson Righellis Inc	
Supplier Payment	Check	31208	5/13/2026	2,529.46	HMI Oregon	
Supplier Payment	Check	31209	5/13/2026	22,134.61	JRT Mechanical Inc - Remit-To: JRT Mechanical Inc	
Supplier Payment	Check	31210	5/13/2026	7,890.34	King County Directors Association Purchasing Department	
Supplier Payment	Check	31211	5/13/2026	10,140.13	Lakeside Industries Inc - Remit-To: Lakeside - LB Seattle	
Supplier Payment	Check	31212	5/13/2026	12,500.00	Life Line Screening of America LTD	
Supplier Payment	Check	31213	5/13/2026	1,800.00	Lighthouse Law Group PLLC	
Supplier Payment	Check	31214	5/13/2026	576.99	Mark IV Enterprises Inc	
Supplier Payment	Check	31215	5/13/2026	303.84	Northwest Natural Gas Company - Remit-To: NW Natural - Portland	
Supplier Payment	Check	31216	5/13/2026	3,140.01	One Call Concepts Inc	
Supplier Payment	Check	31217	5/13/2026	22,893.20	Open House Ministries	
Supplier Payment	Check	31218	5/13/2026	7,356.34	Parametrix, Inc	
Supplier Payment	Check	31219	5/13/2026	13,941.66	Passport Labs Inc. - Remit-To: Passport Labs Inc	
Supplier Payment	Check	31220	5/13/2026	31,420.00	PlanIT Geo, Inc.	
Supplier Payment	Check	31221	5/13/2026	10,934.40	SafeFire LLC	
Supplier Payment	Check	31222	5/13/2026	18,368.71	San Diego Police Equipment Co Inc	
Supplier Payment	Check	31223	5/13/2026	21,235.50	Selectron Technologies, Inc	
Supplier Payment	Check	31224	5/13/2026	6,159.70	Stantec Consulting Services Inc - Remit-To: Stantec - Chicago	
Supplier Payment	Check	31225	5/13/2026	302.48	State of Washington Department of Licensing - Remit-To: Notary Public Program	
Supplier Payment	Check	31226	5/13/2026	43.21	State of Washington Department of Transportation - Remit-To: WADOT - PO Box 47305	
Supplier Payment	Check	31227	5/13/2026	636.00	State of Washington State Patrol	
Supplier Payment	Check	31228	5/13/2026	8.44	Stericycle Inc - Remit-To: Shred-It	
Supplier Payment	Check	31229	5/13/2026	10,746.75	Sunbelt Controls Inc - Remit-To: Sunbelt Controls - Pasadena	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Check	31230	5/13/2026	250.00	Suzanne Best PDH Inc.	
Supplier Payment	Check	31231	5/13/2026	51.00	Totalsir LLC	
Supplier Payment	Check	31232	5/13/2026	900.33	Towing and Recovery Services, Inc.	
Supplier Payment	Check	31233	5/13/2026	50,561.95	Toyota Tsusho Material Handling America Inc - Remit-To: Toyota Lift Northwest - Seattle	
Supplier Payment	Check	31234	5/13/2026	195.00	Vancouver Granite Works Inc	
Supplier Payment	Check	31235	5/13/2026	216.66	Vestis Group, Inc - Remit-To: Vestis - Pasadena	
Supplier Payment	Check	31236	5/13/2026	3,077.90	Waste Connections of Washington - Remit-To: Waste Connections - Vancouver	
Supplier Payment	Check	31237	5/13/2026	218.06	Western Systems Inc	
Supplier Payment	Check	31238	5/13/2026	2,347.78	Zayo Group Holding Inc - Remit-To: Zayo Group Holding Inc	
Miscellaneous Payment	Check	31239	5/13/2026	3,000.00	Baumgartner, Wagner & Jahn PLLC Trust Account on behalf of Douglas Forgey	CLAIM PAYMENT - DOI: 11/16/2021 - RISK
Miscellaneous Payment	Check	31240	5/13/2026	20.00	Douglas County Combined Court	Certified Copy re: 2022CR001174
Miscellaneous Payment	Check	31241	5/13/2026	673.00	JImmy Buell	ENG-85502
Miscellaneous Payment	Check	31242	5/13/2026	700.00	Kayleen Horta	Rental Deposit Refund
Miscellaneous Payment	Check	31243	5/13/2026	495.00	MANSY REAL ESTATE GROUP	Refund overpayment of Business License Fees
Miscellaneous Payment	Check	31244	5/13/2026	134.00	Nylund Inc.	RES-386508 (jobsite: 2005 E 29th Street, Vancouver)
Miscellaneous Payment	Check	31245	5/13/2026	36,733.35	Prairie Homes LLC	CHIP SDC Fee Waiver Refund- 62nd Ave. Cottages Prairie Homes
Miscellaneous Payment	Check	31246	5/13/2026	34,386.68	Stoneridge Development Co LLC	CHIP SDC Waiver Refund-62nd Ave Cottages-Stoneridge Development
Miscellaneous Payment	Check	31247	5/13/2026	221,427.00	The VIC Building Owner LLC	CMI-377875 (jobsite: Bldg L -3301 SE 176th Ave, Vancouver WA 98683)
Miscellaneous Payment	Check	31248	5/13/2026	536,679.00	The VIC Building Owner LLC	CMI-377873 (jobsite: Bldg S - 3301 SE 176th Ave. Vancouver, WA. 98683
Miscellaneous Payment	Check	31249	5/13/2026	269.50	Tiffany Ranieri	Refund parking permit COV14960
Ad Hoc Payment	Check	31250	5/20/2026	374.69	Anderson,Kerry or Cynthia	2104 Z ST ,VANCOUVER,WA,98661

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Ad Hoc Payment	Check	31251	5/20/2026	20.51	DMK Homes Inc	14220 NE 42ND CIR ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31252	5/20/2026	97.38	Eleazar,Faye or Guillermo	16317 NE 71ST ST ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31253	5/20/2026	51.10	Gaylord,Tyler	14010 NE 53RD ST ,VANCOUVER,WA,98682
Ad Hoc Payment	Check	31254	5/20/2026	299.49	Lander,Melissa	2407 NE 127TH PL ,VANCOUVER,WA,98684
Ad Hoc Payment	Check	31255	5/20/2026	230.84	Richard Fenn Living Trust	18204 SE 17TH ST ,VANCOUVER,WA,98683
Ad Hoc Payment	Check	31256	5/20/2026	260.53	Schwartz,Rebecca E or Matthew N	1903 NE 104TH AVE ,VANCOUVER,WA,98664
Ad Hoc Payment	Check	31257	5/20/2026	89.63	The Neidigh Family Trust	15020 SE 35TH ST ,VANCOUVER,WA,98683
Miscellaneous Payment	Check	31258	5/20/2026	100.00	Airport Green Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31259	5/20/2026	64.52	Alex Vega	Refund parking permit COV14387
Miscellaneous Payment	Check	31260	5/20/2026	8.39	Beth Cassidy	Refund overpayment of loan#6000686
Miscellaneous Payment	Check	31261	5/20/2026	100.00	Central Park Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31262	5/20/2026	100.00	East Mill Plain Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31263	5/20/2026	100.00	Edgewood Park Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31264	5/20/2026	110.18	Elaine Armstrong	Refund overpayment of Loan #6000490
Miscellaneous Payment	Check	31265	5/20/2026	100.00	Emerald Landing Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31266	5/20/2026	100.00	Fircrest Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31267	5/20/2026	202.63	Gerald and Cynthia Mattix	Refund overpayment of loan
Miscellaneous Payment	Check	31268	5/20/2026	1,390.64	Gregory Straub	LEOFF Pension Board Member Travel
Miscellaneous Payment	Check	31269	5/20/2026	100.00	Harney Heights Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31270	5/20/2026	100.00	Hudson's Bay Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31271	5/20/2026	172.83	JOHNSON BIXBY	Refund parking permit COV14091
Miscellaneous Payment	Check	31272	5/20/2026	1,229.09	Michael Lyons	LEOFF Pension Board Member Travel
Miscellaneous Payment	Check	31273	5/20/2026	100.00	Mountain View Neighborhood Association	2025 Resource Conservation Challenge
Miscellaneous Payment	Check	31274	5/20/2026	1,146.24	Patrick Kelly	LEOFF Pension Board Member Travel

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Miscellaneous Payment	Check	31275	5/20/2026	57.16	Professional Credit Service	Refund request to PCS for invoice 78254 negative trust. Citation 7205306842 - KAORI NOMI.
Miscellaneous Payment	Check	31276	5/20/2026	66,053.08	Stephen A Mitchell	VPD Case #25-24269
Miscellaneous Payment	Check	31277	5/20/2026	61.00	The Aria	Refund duplicate payment of INV#77085855
Miscellaneous Payment	Check	31278	5/20/2026	112.70	Venessa Tufford	Refund parking permit COV15038
Supplier Payment	Check	31279	5/20/2026	57.87	Airgas, Inc	
Supplier Payment	Check	31280	5/20/2026	540.32	A-Line Asphalt Maintenance Inc	
Supplier Payment	Check	31281	5/20/2026	75.00	Allegiance Benefit Plan Management Inc (COBRA)	
Supplier Payment	Check	31282	5/20/2026	10,040.58	Allegis Group Holdings Inc - Remit-To: TekSystems Inc - Atlanta	
Supplier Payment	Check	31283	5/20/2026	8,659.93	Anderson Glass Co	
Supplier Payment	Check	31284	5/20/2026	10,033.46	Arborscape Ltd Inc	
Supplier Payment	Check	31285	5/20/2026	1,202,512.60	Association of Washington Cities Employee Benefit Trust	
Supplier Payment	Check	31286	5/20/2026	2,969.13	Cellco Partnership - Remit-To: Cellco - Dallas	
Supplier Payment	Check	31287	5/20/2026	150.00	Cellco Partnership - Remit-To: Cellco - NJ	
Supplier Payment	Check	31288	5/20/2026	10,742.06	CFM Strategic Communications, Inc.	
Supplier Payment	Check	31289	5/20/2026	240.00	Christopher Scott Kendall	
Supplier Payment	Check	31290	5/20/2026	8.20	Cintas	
Supplier Payment	Check	31291	5/20/2026	3,354.00	City Bark & Recycling LLC	
Supplier Payment	Check	31292	5/20/2026	978.30	Clark County Fire District 5	
Supplier Payment	Check	31293	5/20/2026	3,534.55	Clark County Public Utility District No. 1	
Supplier Payment	Check	31294	5/20/2026	439,768.66	Clark County Public Utility District No. 1	
Supplier Payment	Check	31295	5/20/2026	385,347.95	Clark County - Remit-To: Clark County - Treasurer Vancouver	
Supplier Payment	Check	31296	5/20/2026	3,150.00	Clark County Title Company - Remit-To: Clark County - Reconveyance Fees	
Supplier Payment	Check	31297	5/20/2026	111.57	Clifford & Martin, Inc	
Supplier Payment	Check	31298	5/20/2026	8,458.55	Columbia Resource Company	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Check	31299	5/20/2026	858.84	Connecta Satellite Solutions LLC	
Supplier Payment	Check	31300	5/20/2026	9,000.00	Cooperative Personnel Services	
Supplier Payment	Check	31301	5/20/2026	1,871.41	CUES Inc - Remit-To: CUES Inc - Cincinnati	
Supplier Payment	Check	31302	5/20/2026	2,006.03	Cummins Inc	
Supplier Payment	Check	31303	5/20/2026	21,050.00	DHM LLC	
Supplier Payment	Check	31304	5/20/2026	7,188.00	Engineering Systems Inc.	
Supplier Payment	Check	31305	5/20/2026	300.00	ERF Company Inc	
Supplier Payment	Check	31306	5/20/2026	1,013.51	Esix Sportswear	
Supplier Payment	Check	31307	5/20/2026	787.50	FFA Architecture and Interiors, Inc	
Supplier Payment	Check	31308	5/20/2026	525.00	First American Title Ins Co	
Supplier Payment	Check	31309	5/20/2026	1,496.00	Foster Garvey PC	
Supplier Payment	Check	31310	5/20/2026	64,164.65	GBD Architects	
Supplier Payment	Check	31311	5/20/2026	3,605.28	Genuine Parts Company - Remit-To: NAPA - Vancouver	
Supplier Payment	Check	31312	5/20/2026	560.00	GOLDROCK INVT LLC	
Supplier Payment	Check	31313	5/20/2026	104,139.77	Greystone Partners, Inc	
Supplier Payment	Check	31314	5/20/2026	702.08	Gunderson Services LLC	
Supplier Payment	Check	31315	5/20/2026	5,842.85	H&H Wood Recyclers	
Supplier Payment	Check	31316	5/20/2026	724.00	Harold LeMay Enterprises	
Supplier Payment	Check	31317	5/20/2026	117,812.40	H D Fowler Company Inc	
Supplier Payment	Check	31318	5/20/2026	4,438.93	HDJ Design Group - Remit-To: HDJ - Portland	
Supplier Payment	Check	31319	5/20/2026	15,130.36	Herrera Environmental Consultants Inc	
Supplier Payment	Check	31320	5/20/2026	8,268.37	Hispanic Metropolitan Chamber	
Supplier Payment	Check	31321	5/20/2026	476.71	Howmedica Osteonics Corp	
Supplier Payment	Check	31322	5/20/2026	1,839.32	Invintus Media LLC	
Supplier Payment	Check	31323	5/20/2026	1,521.52	J.S. Held LLC	
Supplier Payment	Check	31324	5/20/2026	81.68	J-2 Blueprint Supply Co.	
Supplier Payment	Check	31325	5/20/2026	1,470.15	Jamestown Networks	
Supplier Payment	Check	31326	5/20/2026	4,252.90	Kramer Gehlen & Associates	
Supplier Payment	Check	31327	5/20/2026	1,691.41	Kurita America Inc - Remit-To: US Water - Minneapolis	
Supplier Payment	Check	31328	5/20/2026	4,890.41	L.N. Curtis & Sons - Remit-To: Supplier L.N. Curtis & Sons	
Supplier Payment	Check	31329	5/20/2026	580.87	Lakeside Industries Inc - Remit-To: Lakeside - LB Seattle	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Check	31330	5/20/2026	35,274.83	Life Insurance Company of North America	
Supplier Payment	Check	31331	5/20/2026	1,864.27	Lincoln Aquatics	
Supplier Payment	Check	31332	5/20/2026	1,434.81	Loomis Armored US LLC - Remit-To: Loomis - Palatine	
Supplier Payment	Check	31333	5/20/2026	3,996.81	Lower Columbia Estuary Partnership	
Supplier Payment	Check	31334	5/20/2026	93,739.00	LSW Architects PC	
Supplier Payment	Check	31335	5/20/2026	3,317.50	Marauder Ortho LLC	
Supplier Payment	Check	31336	5/20/2026	3,714.00	McFarlanes Bark Inc	
Supplier Payment	Check	31337	5/20/2026	1,575.00	Message Gears LLC	
Supplier Payment	Check	31338	5/20/2026	600.00	Nagra & Atwal Corporation	
Supplier Payment	Check	31339	5/20/2026	5,491.94	National Park Service - Remit-To: National Park Service - Pearson Lease	
Supplier Payment	Check	31340	5/20/2026	7,125.00	Neil Cane	
Supplier Payment	Check	31341	5/20/2026	325.00	Nichols Mediation LLC	
Supplier Payment	Check	31342	5/20/2026	3,217.50	Noble Consulting and Expert Witness Services LLC	
Supplier Payment	Check	31343	5/20/2026	110.00	Northwest Drug-Safe LLC	
Supplier Payment	Check	31344	5/20/2026	6,065.33	Northwest Natural Gas Company - Remit-To: NW Natural - Portland	
Supplier Payment	Check	31345	5/20/2026	2,986.67	Parametrix, Inc	
Supplier Payment	Check	31346	5/20/2026	10,446.56	Passport Labs Inc. - Remit-To: Passport Labs Inc	
Supplier Payment	Check	31347	5/20/2026	34,479.31	Phoenix Asphalt Maintenance Company, Inc.	
Supplier Payment	Check	31348	5/20/2026	70.00	Porter W Yett Company	
Supplier Payment	Check	31349	5/20/2026	1,562.00	Portland Adventist Medical Center	
Supplier Payment	Check	31350	5/20/2026	16,800.00	Portland Valuation Group Inc.	
Supplier Payment	Check	31351	5/20/2026	14.19	Qwest Corporation - Remit-To: CenturyLink - Phoenix	
Supplier Payment	Check	31352	5/20/2026	8,869.83	Qwest Corporation - Remit-To: Qwest Corp- Seattle	
Supplier Payment	Check	31353	5/20/2026	356.70	S&B Inc	
Supplier Payment	Check	31354	5/20/2026	11,403.00	SafeFire LLC	
Supplier Payment	Check	31355	5/20/2026	31,495.00	Sazan Group, Inc	
Supplier Payment	Check	31356	5/20/2026	42,334.90	Scott Edwards Architecture LLP	
Supplier Payment	Check	31357	5/20/2026	2,687.73	SEA-WESTERN, INC.	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Check	31358	5/20/2026	4,142.78	Shrums Pest Control	
Supplier Payment	Check	31359	5/20/2026	169.00	Southwest Clean Air Agency	
Supplier Payment	Check	31360	5/20/2026	83,178.09	Southwest Washington Humane Society	
Supplier Payment	Check	31361	5/20/2026	1,239.21	State of Washington Department of Licensing - Remit-To: Notary Public Program	
Supplier Payment	Check	31362	5/20/2026	25,692.21	State of Washington Department of Transportation - Remit-To: WADOT - PO Box 47339	
Supplier Payment	Check	31363	5/20/2026	22,439.06	Sunbelt Controls Inc - Remit-To: Sunbelt Controls - Pasadena	
Supplier Payment	Check	31364	5/20/2026	7,728.66	TMG Services Inc	
Supplier Payment	Check	31365	5/20/2026	969.22	Towing and Recovery Services, Inc.	
Supplier Payment	Check	31366	5/20/2026	165.53	Transunion Risk & Alternative Data Solutions Inc	
Supplier Payment	Check	31367	5/20/2026	1,900.00	Triangle Resources Inc	
Supplier Payment	Check	31368	5/20/2026	1,402.54	Trilogy MedWaste West, LLC	
Supplier Payment	Check	31369	5/20/2026	10,678.05	Triple J Enterprises, Inc.	
Supplier Payment	Check	31370	5/20/2026	2,039.07	United States Department of Agriculture - Remit-To: USDA APHIS - St Louis	
Supplier Payment	Check	31371	5/20/2026	101.43	Vestis Group, Inc - Remit-To: Vestis - Pasadena	
Supplier Payment	Check	31372	5/20/2026	2,866.88	W.B. Sprague Co. Inc.	
Supplier Payment	Check	31373	5/20/2026	3,241.26	Walter E Nelson Company	
Supplier Payment	Check	31374	5/20/2026	1,522.14	Washington State Criminal Justice Training Commission	
Supplier Payment	Check	31375	5/20/2026	36,311.99	Waste Connections of Washington - Remit-To: Waste Connections - Vancouver	
Supplier Payment	Check	31376	5/20/2026	10,985.97	Western Systems Inc	
Supplier Payment	Check	31377	5/22/2026	4,976.32	Aflac	
Supplier Payment	Check	31378	5/22/2026	6,224.49	AFSCME Local #307	
Supplier Payment	Check	31379	5/22/2026	575.00	California State Disbursement Unit	
Supplier Payment	Check	31380	5/22/2026	2,533.50	Chapter 13 - Trustee	
Supplier Payment	Check	31381	5/22/2026	491.00	Hawaii SDU	
Supplier Payment	Check	31382	5/22/2026	759.96	IAM Local #1374	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Check	31383	5/22/2026	9,162.52	Life Insurance Company of North America	
Supplier Payment	Check	31384	5/22/2026	1,150.00	MFS Service Center Inc	
Supplier Payment	Check	31385	5/22/2026	150.00	OPEIU Local #11	
Supplier Payment	Check	31386	5/22/2026	6,844.20	OPEIU Local #11	
Supplier Payment	Check	31387	5/22/2026	974.00	Teamsters Local #58	
Supplier Payment	Check	31388	5/22/2026	367.50	UA Local #290	
Supplier Payment	Check	31389	5/22/2026	2,755.80	Western Conference of Teamsters	
Supplier Payment	Check	31390	5/22/2026	1,497.30	Western Metal Industry Pension Fund	
Cash Advance Payment	Direct Deposit	EFT-00351243	5/14/2026	115.25	Sean Suarez	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351244	5/14/2026	144.00	Jay Glover	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351245	5/14/2026	115.25	Christian Toves	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351246	5/14/2026	115.25	Austin Warner	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351247	5/14/2026	440.00	Tanya Wollstein	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351248	5/14/2026	258.00	Amanda Trygg	Travel Advance
Expense Payment	Direct Deposit	EFT-00351249	5/14/2026	175.00	Liz Erickson	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351250	5/14/2026	36.75	Taylor Hallvik	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351251	5/14/2026	469.40	Jeremy Vanroyce	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351252	5/14/2026	207.00	John Jacobson	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351253	5/14/2026	250.00	Luke Koistinen	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351254	5/14/2026	96.66	Anne McEnerny-Ogle	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351255	5/14/2026	2,204.94	Erik Paulsen	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351256	5/14/2026	41.94	Cale Baker	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351257	5/14/2026	118.95	Chad Lawry	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351258	5/14/2026	522.24	Paul Porter	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351259	5/14/2026	112.66	Bryan Fredrickson	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351260	5/14/2026	95.00	Austin Warner	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351261	5/14/2026	70.00	Robb Milano	Employee Reimbursement

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Expense Payment	Direct Deposit	EFT-00351262	5/14/2026	74.06	Anthony Tortorici	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351263	5/14/2026	70.00	Timothy Kays	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351264	5/14/2026	88.15	John Laible	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351265	5/14/2026	35.90	Brian Potter	Employee Reimbursement
Cash Advance Payment	Direct Deposit	EFT-00351266	5/14/2026	144.00	Freddie Cruz	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351267	5/14/2026	118.31	Lam Vuong	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351268	5/14/2026	322.00	Saray Farias-Pulido	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351269	5/14/2026	144.00	Chris Kimberling	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351270	5/14/2026	144.00	James Correll	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351271	5/14/2026	331.50	Chad Dammarell	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351272	5/14/2026	69.00	Brian Viles	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351273	5/14/2026	69.00	Christopher Holmquist	Travel Advance
Cash Advance Payment	Direct Deposit	EFT-00351274	5/14/2026	374.00	James Porter	Travel Advance
Expense Payment	Direct Deposit	EFT-00351322	5/21/2026	74.69	Nicole Martin	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351323	5/21/2026	74.69	Brian Potter	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351324	5/21/2026	594.90	April Stinson	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351325	5/21/2026	172.05	Jonathan Guerrero	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351326	5/21/2026	36.00	Tanya Gray	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351327	5/21/2026	467.50	Patrick Gilbride	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351328	5/21/2026	685.32	Ryan Miles	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351329	5/21/2026	165.00	Drew Klaetsch	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351330	5/21/2026	102.52	Sean Donaldson	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351331	5/21/2026	74.69	Mike Cero	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351332	5/21/2026	280.00	Kevin Smithline	Employee Reimbursement
Expense Payment	Direct Deposit	EFT-00351333	5/21/2026	82.43	Franklin Gomez	Employee Reimbursement

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Expense Payment	Direct Deposit	EFT-00351334	5/21/2026	189.00	Noah Hilliker	Employee Reimbursement
Cash Advance Payment	Direct Deposit	EFT-00351335	5/21/2026	612.00	Sean Douglas	Travel Advance
Supplier Payment	EFT	EFT-00351275	5/14/2026	83,953.00	Wilson Oil Inc. - Remit-To: Wilson Oil Inc	
Supplier Payment	EFT	EFT-00351276	5/14/2026	4,500.00	Swordfish Consulting Services, LLC	
Supplier Payment	EFT	EFT-00351277	5/14/2026	4,060.25	JRT Mechanical Inc	
Supplier Payment	EFT	EFT-00351278	5/14/2026	20,429.25	Rapid Response Bio Clean Inc.	
Supplier Payment	EFT	EFT-00351279	5/14/2026	234,253.87	Midway Underground LLC	
Supplier Payment	EFT	EFT-00351280	5/14/2026	2,901.89	City Electric Co	
Supplier Payment	EFT	EFT-00351281	5/14/2026	16,976.00	Buchalter LLP	
Supplier Payment	EFT	EFT-00351282	5/14/2026	480.00	Rotschy Inc	
Supplier Payment	EFT	EFT-00351283	5/14/2026	3,334.72	Waxie's Enterprises Inc	
Supplier Payment	EFT	EFT-00351284	5/14/2026	16,580.15	MacDonald-Miller Facility Solutions Inc	
Supplier Payment	EFT	EFT-00351285	5/14/2026	19,980.00	The Exhibits Department, LLC	
Supplier Payment	EFT	EFT-00351286	5/14/2026	2,932.68	Jasmine Alayadhi	
Supplier Payment	EFT	EFT-00351287	5/14/2026	176,682.52	Jeffrey D. Barrar, PS	
Supplier Payment	EFT	EFT-00351288	5/14/2026	591.78	Praxair Distribution Inc	
Supplier Payment	EFT	EFT-00351289	5/14/2026	3,195.00	SC Beholdings LLC	
Supplier Payment	EFT	EFT-00351290	5/14/2026	6,751.80	Stellar J Corporation	
Supplier Payment	EFT	EFT-00351291	5/14/2026	1,971.60	State of Washington Consolidated Technology Services	
Supplier Payment	EFT	EFT-00351292	5/14/2026	62,002.44	Live Love Outreach	
Supplier Payment	EFT	EFT-00351293	5/14/2026	217.75	Key Code Media, Inc	
Supplier Payment	EFT	EFT-00351294	5/14/2026	5,739.25	Terracon Consultants Inc - Remit-To: Terracon Consultans Inc	
Supplier Payment	EFT	EFT-00351295	5/14/2026	347,447.54	Jacobs Engineering Group Inc	
Supplier Payment	EFT	EFT-00351296	5/14/2026	3,745.00	Marshall Hicks Law LLC	
Supplier Payment	EFT	EFT-00351297	5/14/2026	163,724.91	Brown and Caldwell - Remit-To: Brown & Caldwell - San Francisco	
Supplier Payment	EFT	EFT-00351298	5/14/2026	58,233.93	Consor North America Inc - Remit-To: Consor North America	
Supplier Payment	EFT	EFT-00351299	5/14/2026	5,980.79	McKinstry Co., LLC	
Supplier Payment	EFT	EFT-00351300	5/14/2026	1,218.00	Allegiance Benefit Plan Management Inc (Pension and Flex).	
Supplier Payment	EFT	EFT-00351301	5/14/2026	103.46	T2 Systems Inc - Remit-To: T2- Atlanta	
Supplier Payment	EFT	EFT-00351302	5/14/2026	70,082.00	United Site Services of Nevada, Inc.	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	EFT	EFT-00351303	5/14/2026	38.13	Ziply Fiber	
Supplier Payment	EFT	EFT-00351304	5/14/2026	3,680.54	Sarkinen Plumbing, Inc.	
Supplier Payment	EFT	EFT-00351305	5/14/2026	38,337.47	State of Washington Department of Enterprise Services	
Supplier Payment	EFT	EFT-00351306	5/14/2026	2,876.81	Solid Waste Systems	
Supplier Payment	EFT	EFT-00351307	5/14/2026	2,520.00	The EBOA	
Supplier Payment	EFT	EFT-00351308	5/14/2026	1,072.50	Tierra Right of Way Services LTD	
Supplier Payment	EFT	EFT-00351309	5/14/2026	952,349.87	Operations Management International Inc	
Supplier Payment	EFT	EFT-00351310	5/14/2026	287.52	Contract Land Staff LLC	
Supplier Payment	EFT	EFT-00351311	5/14/2026	733.00	Safeware, Inc.	
Supplier Payment	EFT	EFT-00351312	5/14/2026	25,765.75	Stability Solutions LLC	
Supplier Payment	EFT	EFT-00351313	5/14/2026	133,911.40	Council for the Homeless	
Supplier Payment	EFT	EFT-00351314	5/14/2026	1,836.00	Rock Creek Communications, LLC	
Supplier Payment	EFT	EFT-00351315	5/14/2026	19,150.37	Northwest Staffing Resources Inc - Remit-To: Northwest Staffing Resources	
Supplier Payment	EFT	EFT-00351336	5/21/2026	14,069.72	Power Systems West LLC	
Supplier Payment	EFT	EFT-00351337	5/21/2026	2,769.33	McKinstry Co., LLC	
Supplier Payment	EFT	EFT-00351338	5/21/2026	30,771.31	Right! Systems Inc	
Supplier Payment	EFT	EFT-00351339	5/21/2026	8,013.64	Stock Enterprises LLC	
Supplier Payment	EFT	EFT-00351340	5/21/2026	9,959.45	Vancouver Housing Authority	
Supplier Payment	EFT	EFT-00351341	5/21/2026	110.15	MedTox Laboratories, Inc.	
Supplier Payment	EFT	EFT-00351342	5/21/2026	5,149.17	Outsiderinn.org	
Supplier Payment	EFT	EFT-00351343	5/21/2026	29,528.24	Consolidated Electrical Distribution	
Supplier Payment	EFT	EFT-00351344	5/21/2026	1,295.00	Performance Occupational Health Services, LLC	
Supplier Payment	EFT	EFT-00351345	5/21/2026	1,644.75	Rapid Response Bio Clean Inc.	
Supplier Payment	EFT	EFT-00351346	5/21/2026	7,934.83	CivicPlus, LLC	
Supplier Payment	EFT	EFT-00351347	5/21/2026	7,463.68	Oregon Rifleworks LLC	
Supplier Payment	EFT	EFT-00351348	5/21/2026	400.00	Bradford Davis	
Supplier Payment	EFT	EFT-00351349	5/21/2026	5,263.90	Bacon Collision & Reconditioning, LLC	
Supplier Payment	EFT	EFT-00351350	5/21/2026	4,100.00	Andrew Prochniak	
Supplier Payment	EFT	EFT-00351351	5/21/2026	5,000.00	Vancouver Bee Project	
Supplier Payment	EFT	EFT-00351352	5/21/2026	20,347.63	Micro Enterprise Services of Oregon	
Supplier Payment	EFT	EFT-00351353	5/21/2026	27,867.45	Northwest Royal Home Care	
Supplier Payment	EFT	EFT-00351354	5/21/2026	482.43	Lasko Printing Specialties Inc	

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INVOICE PAYMENTS REPORT

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Supplier Payment	EFT	EFT-00351355	5/21/2026	3,429.00	Contract Land Staff LLC	
Supplier Payment	EFT	EFT-00351356	5/21/2026	16,712.80	Universal Protection Services, LP	
Supplier Payment	EFT	EFT-00351357	5/21/2026	3,998.39	Waxie's Enterprises Inc	
Supplier Payment	EFT	EFT-00351358	5/21/2026	43,848.94	PBS Engineering and Environmental Inc	
Supplier Payment	EFT	EFT-00351359	5/21/2026	423.50	KFPro, Inc	
Supplier Payment	EFT	EFT-00351360	5/21/2026	828.00	SiteCrafting Inc	
Supplier Payment	EFT	EFT-00351361	5/21/2026	141.10	State of Washington Auditor's Office	
Supplier Payment	EFT	EFT-00351362	5/21/2026	436.00	Clarity Consulting Partners, LLC	
Supplier Payment	EFT	EFT-00351363	5/21/2026	3,339.97	Fehr & Peers	
Supplier Payment	EFT	EFT-00351364	5/21/2026	213,750.28	Sound Distributions Inc	
Supplier Payment	EFT	EFT-00351365	5/21/2026	2,451.00	Bound Tree Medical LLC	
Supplier Payment	EFT	EFT-00351366	5/21/2026	7,329.00	First Stop Holdings LLC	
Supplier Payment	EFT	EFT-00351367	5/21/2026	4,720.76	Lakeyland Inc	
Supplier Payment	EFT	EFT-00351368	5/21/2026	21,722.22	Halme Excavating Inc	
Supplier Payment	EFT	EFT-00351369	5/21/2026	1,070.00	Atlas Technical Consultants LLC	
Supplier Payment	EFT	EFT-00351370	5/21/2026	516.44	Archaeological Investigations Northwest Inc	
Supplier Payment	EFT	EFT-00351371	5/21/2026	32,886.45	Sable Electric LLC	
Supplier Payment	EFT	EFT-00351372	5/21/2026	1,785.00	Do Good Multnomah	
Supplier Payment	EFT	EFT-00351373	5/21/2026	804.00	Marten Law LLP	
Supplier Payment	EFT	EFT-00351374	5/21/2026	3,892.24	Accurate Investigation Services	
Supplier Payment	EFT	EFT-00351375	5/21/2026	72,617.51	Western United Civil Group, LLC - Remit-To: Western United Civil Group, LLC	
Supplier Payment	EFT	EFT-00351376	5/21/2026	13,082.00	Nelson Nygaard Consulting Associates Inc - Remit-To: Nelson Nygaard Consulting Associates Inc	
Supplier Payment	EFT	EFT-00351377	5/21/2026	591,849.51	TCF Architecture, PLLC	
Supplier Payment	EFT	EFT-00351378	5/21/2026	914,439.45	Nutter Corporation	
Supplier Payment	EFT	EFT-00351379	5/21/2026	14,843.20	Mutt Mitt	
Supplier Payment	EFT	EFT-00351380	5/21/2026	24,501.75	Jacobs Engineering Group Inc	
Supplier Payment	EFT	EFT-00351381	5/21/2026	10,594.49	Limeade, Inc	
Supplier Payment	EFT	EFT-00351382	5/21/2026	5,087.42	Distinctive Landscape LLC	
Supplier Payment	EFT	EFT-00351383	5/21/2026	2,923.44	Del Sol Inc	
Supplier Payment	EFT	EFT-00351384	5/21/2026	4,000.00	The Amy VanCamp Experience LLC	
Supplier Payment	EFT	EFT-00351385	5/21/2026	59,469.56	Wilson Oil Inc. - Remit-To: Wilson Oil Inc	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	EFT	EFT-00351386	5/21/2026	3,591.82	State of Washington Department of Enterprise Services	
Supplier Payment	EFT	EFT-00351387	5/21/2026	35,059.05	Operations Management International Inc	
Supplier Payment	EFT	EFT-00351388	5/21/2026	3,362.50	LMCA, Inc.	
Supplier Payment	EFT	EFT-00351389	5/21/2026	560.00	United Site Services of Nevada, Inc.	
Supplier Payment	EFT	EFT-00351390	5/21/2026	140.00	Brad Piesch Aggressive Enterprises, Inc	
Supplier Payment	EFT	EFT-00351391	5/21/2026	18,342.01	HDR Engineering, Inc - Remit-To: HDR Engineering - Chicago	
Supplier Payment	EFT	EFT-00351392	5/21/2026	49,654.50	Consor North America Inc - Remit-To: Consor North America	
Supplier Payment	EFT	EFT-00351393	5/21/2026	10,479.19	Western Water Works Supply Co Inc	
Supplier Payment	EFT	EFT-00351394	5/21/2026	38.45	Ziply Fiber	
Supplier Payment	EFT	EFT-00351395	5/21/2026	1,026.11	Canon Financial Services Inc	
Supplier Payment	EFT	EFT-00351396	5/21/2026	2,434.09	Level 3 Financing, Inc	
Supplier Payment	EFT	EFT-00351397	5/21/2026	90,773.45	Infor Public Sector, Inc - Remit-To: InforPublic Sector	
Supplier Payment	EFT	EFT-00351398	5/21/2026	11,454.62	Northwest Staffing Resources Inc - Remit-To: Northwest Staffing Resources	
Supplier Payment	EFT	EFT-00351399	5/21/2026	3,096.00	Professional Roof Consultants Inc	
Supplier Payment	EFT	EFT-00351400	5/21/2026	1,410.00	Eurofins Eaton Analytical, LLC	
Supplier Payment	EFT	EFT-00351401	5/21/2026	510,128.30	North Cascade Excavating	
Supplier Payment	EFT	EFT-00351402	5/21/2026	2,185.00	Jasmine Alayadhi	
Supplier Payment	EFT	EFT-00351403	5/21/2026	140,560.50	PC Specialists Inc - Remit-To: TIG - San Diego	
Supplier Payment	EFT	EFT-00353457	5/22/2026	168.39	Legal Shield	
Supplier Payment	EFT	EFT-00353458	5/22/2026	482,599.61	Nationwide Retirements Solutions Inc	
Supplier Payment	EFT	EFT-00353459	5/22/2026	35,786.38	IAFF Local #452	
Supplier Payment	EFT	EFT-00353460	5/22/2026	12,906.60	Vancouver Police Officer Guild	
Supplier Payment	EFT	EFT-00353461	5/22/2026	25,572.65	Allegiance Benefit Plan Management Inc (COBRA)	
Supplier Payment	EFT	EFT-00353462	5/22/2026	1,293.36	Vancouver Command Guild	

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INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Manual Wire		5/8/2026	137.71	Keybank National Association	
Supplier Payment	Manual Wire		5/11/2026	397,386.90	Kaiser Permanente - Remit-To: Kaiser Permanente	
Supplier Payment	Manual Wire		5/11/2026	1,465,166.51	Internal Revenue Service	
Supplier Payment	Manual Wire		5/11/2026	1,028.94	Blue Cross Blue Shield of Oregon	
Supplier Payment	Manual Wire		5/12/2026	21,506.86	Bank Of America N.A. - Remit-To: Charlotte NC	
Supplier Payment	Manual Wire		5/12/2026	58,531.44	State of Oregon Department of Revenue	
Supplier Payment	Manual Wire		5/12/2026	396,491.02	Kaiser Permanente - Remit-To: Kaiser Permanente	
Supplier Payment	Manual Wire		5/13/2026	394,898.62	Kaiser Permanente - Remit-To: Kaiser Permanente	
Supplier Payment	Manual Wire		5/14/2026	892,315.72	State of Washington Department of Retirement Systems (DRS)	
Supplier Payment	Manual Wire		5/14/2026	357,821.95	Clark County - Remit-To: Clark County - Treasurer Vancouver	
Procurement Card Payment	Manual Wire		5/14/2026	923,058.83	CoV JPM Procurement Card	
Supplier Payment	Manual Wire		5/15/2026	15,693.08	Liberty Mutual Group Inc.	
Supplier Payment	Manual Wire		5/15/2026	394,332.20	Kaiser Permanente - Remit-To: Kaiser Permanente	
Supplier Payment	Manual Wire		5/15/2026	6,338.63	Superion, LLC	
Supplier Payment	Manual Wire		5/15/2026	177.65	Bank Of America N.A. - Remit-To: Account Analysis	
Supplier Payment	Manual Wire		5/18/2026	396,627.87	Kaiser Permanente - Remit-To: Kaiser Permanente	
Supplier Payment	Manual Wire		5/18/2026	1,237.00	JP Morgan Chase Bank, N.A.	
Supplier Payment	Manual Wire		5/19/2026	32,035.24	Liberty Mutual Group Inc.	
Supplier Payment	Manual Wire		5/19/2026	109.90	Washington Dental Service	
Supplier Payment	Manual Wire		5/19/2026	73,283.62	Paymentus Corporation	

*Please contact Procurement Services if you would like to review the justification for EMERGENCY procurement.

INVOICE PAYMENTS REPORT

Payment Category	Payment Type	Transaction Reference	Payment Date	Payment Amount	Payment Payee	Memo
Supplier Payment	Manual Wire		5/19/2026	99,646.61	Amwins Group, Inc.	
Supplier Payment	Manual Wire		5/19/2026	36,082.26	Blue Cross Blue Shield of Oregon	
Supplier Payment	Manual Wire		5/21/2026	25.00	KFPro, Inc	
Supplier Payment	Manual Wire		5/22/2026	107,334.47	State of Washington Department of Retirement	
Supplier Payment	Manual Wire		5/22/2026	36,135.00	Vancouver Firefighters Union Health & Welfare Trust	
Supplier Payment	Manual Wire		5/22/2026	586.00	Oregon SDU	
Supplier Payment	Manual Wire		5/22/2026	6,942.20	Washington SDU	
Supplier Payment	Manual Wire		5/22/2026	32,406.43	Washington State Firefighters	
Supplier Payment	Manual Wire		5/22/2026	11,604.24	Western States Health & Welfare Trust	
Hansen Refunds	City Payments		5/18/2026	5,540.23	City Payments	Posted 05/11/26 - 05/17/26
Hansen Refunds	City Payments		5/25/2026	7,086.48	City Payments	Posted 05/18/26 - 05/24/26
VISA Refunds	Credit Card		5/18/2026	1,572.36	Miscellaneous	Parks Class Refund FCC 05/11/26 - 05/17/26
VISA Refunds	Credit Card		5/18/2006	150.00	Miscellaneous	Parks Class Refund MCC 05/11/26 - 05/17/26
VISA Refunds	Credit Card		5/25/2026	954.54	Miscellaneous	Parks Class Refund FCC 05/18/26 - 05/24/26
VISA Refunds	Credit Card		5/25/2026	279.00	Miscellaneous	Parks Class Refund MCC 05/18/26 - 05/24/26
		Payment Category	**Description**	**Total Amount**		
		Checks	Total of all check payments	4,729,015.26		
		Direct Deposit	Total of all direct deposit payments	11,183.00		
		EFT	Total of all EFT payments	6,202,915.62		
		Manual Wire	Total of all manual wire payments	6,158,941.90		
		Hansen Total	Total of all hansen payments	12,626.71		
		VISA Total	Total of all visa payments	2,955.90		
		Payroll Total (Separate Excel Sheet)	Total of all payroll payments	5,111,726.09		
		Grand Total	**All payments**	**22,229,364.48**		

*Please contact Procurement Services if you would like to review the justification for EMERGENCY procurement.

Payroll Council Report

Payroll council report for the period: May 11, 2026 - May 24, 2026

This sheet provides a summary of all payroll-related check and EFT transactions processed during the reporting period. Each entry includes the transaction reference, date, description, and amount. This report is provided to Council to document all payroll transactions for the period.

Transaction Reference	Date	Explanation	Amount	
3393 - 3409	05/22/26	May 22 Payroll	$	6,289.62
351404 - 353386	05/22/26	May 22 Direct Deposits	$	5,105,436.47
		Total	**$**	**5,111,726.09**

This information is structured for accessibility and screen navigation.

AN ORDINANCE updating and amending the City of Vancouver 2026-2045 Comprehensive Plan, called Our Vancouver, repealing and replacing the City of Vancouver Zoning Map, and repealing and replacing Title 20 Land Use and Development Code of the Vancouver Municipal Code, providing for severability and an effective date.

Staff Report: 103-26

To: Mayor and City Council
From: City Manager
Date: June 1, 2026

Subject

Ordinance Adopting the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code

Key Points

- The City of Vancouver is proposing the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code (VMC) Title 20 Land Use and Development Code to replace the existing Comprehensive Plan (2011-2030) and zoning code in full.
- The proposed plan, map, and code have been drafted in response to 1. State Growth Management Act (GMA) requirements including completing a full update by December 31, 2025, planning for and accommodating at least 38,000 more housing units by 2045 (HB 1220), and at a minimum allowing up to 4 to 6 units on all residential lots (HB 1110), 2. City Council direction and priorities including climate action, equity, and community safety, and 3. community input.
- The proposed plan, map, and code have been developed through a multi-year process beginning in early 2023, involving the Vancouver community, the Planning Commission and City Council and many other organizations, agencies and partners. Throughout the process, more than 2,000 people have been directly engaged through over 200 meetings, events, workshops, and outreach activities.
- The proposed plan includes 10 chapters, with a map showing the 4 Comprehensive Plan designations. The proposed map and code have 10 base zoning districts, which among other regulations include minimum residential density and maximum height requirements to support efficient use of land, protect agricultural and natural areas outside of Urban Growth Areas from development, and add more housing to meet the needs of the community.

Strategic Plan Alignment

Transportation and Mobility – a safe, future-ready and convenient transportation system

Economic Opportunity – a place where a wide variety of businesses of all sizes grow and thrive

Housing and Human Needs – meeting basic needs and partnering with organizations to support the community

Vibrant and Distinct Neighborhoods – a variety of accessible places and spaces

Culture and Heritage – celebrating culture and heritage

Safe and Prepared Community – a safe place to live, work, learn and play

Climate and Natural Systems – environmental stewardship and efforts to address climate change to ensure a sustainable future

High Performing Government – a government that is reliable, fiscally responsible, equitable, and open to compromise

Present Situation

Background

The City of Vancouver is proposing an updated 2026-2045 Comprehensive Plan, called Our Vancouver, City of Vancouver Zoning Map, and Title 20 Land Use and Development Code of the Vancouver Municipal Code (VMC). The City of Vancouver's Comprehensive Plan provides the overall long-term vision and policy direction to manage the built and natural environment in Vancouver for the next 20 years and to provide necessary public facilities to achieve that vision. The City adopted its first comprehensive plan under Washington's Growth Management Act (GMA) in 1994 with a major re-write occurring in 2004, and a less substantive update in 2011. The zoning code, which is a key tool to implement Comprehensive Plan policy direction, was last updated in full in 2004 and has been incrementally updated since.

The Updated Comprehensive Plan and Zoning Code have been drafted in response to state GMA requirements to complete a full update no later than December 31, 2025. Clark County and other cities within Clark County are also in the process of completing their Comprehensive Plan updates under this timeline.

The following GMA goals guide the development and adoption of comprehensive plans and development regulations (RCW 36.70A.020):

1. Urban growth. Encourage development in urban areas.
2. Reduce Sprawl. Reduce the inappropriate conversion of undeveloped land.
3. Transportation. Encourage efficient multimodal transportation systems.
4. Housing. Plan for and accommodate housing affordable to all economic segments.
5. Economic development. Encourage economic development throughout the state.
6. Property rights. Private property shall not be taken for public use without just compensation having been made.
7. Permits. Applications should be processed in a timely and fair manner.
8. Natural resource industries. Maintain and enhance natural resource-based industries.
9. Open space and recreation. Retain open space, enhance recreational opportunities.
10. Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
11. Citizen participation and coordination. Encourage the involvement of citizens.
12. Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate.
13. Historic preservation. Identify and encourage preservation.
14. Climate change and resiliency. Ensure that comprehensive plans, development regulations,

and regional policies, plans, and strategies adapt to and mitigate the effects of a changing climate.

15. Shoreline management. The goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the city's comprehensive plan.

The current comprehensive designation map, which designates types and intensities of uses allowed throughout the City, is broken down into five general Comprehensive Plan designations:

- Residential (Urban Low Density and Urban High Density),
- Water,
- Open Space or Public Facility,
- Commercial/Mixed Use, and
- Industrial

The current zoning code has 17 specific zoning districts nested under the above Comprehensive Plan designations, and 12 overlays impose additional or varied requirements in specific areas. In general, this structure is based on a historical zoning model that aims to segment different land uses based on perceived externalities and impacts, as was common with many cities in the state of Washington and throughout the country at large in the 20th and early 21st centuries.

As with many other cities nationally, this pattern of development has both directly and indirectly contributed to sprawling land use patterns, auto dependency, inequitable access to housing, and increased greenhouse gas (GHG) emissions in the community. Currently, 46% of land in the City is dedicated exclusively to single-family residential uses, limiting nearly half of the City to a single, low intensity development type. This has led to decades of housing underproduction and created a crisis of housing supply in Vancouver and across Washington state. As the City has grown, underproduction led to low vacancy rates, driving up the cost of housing across all type, size and tenure categories, increasing the number of cost-burdened households (defined as households that pay more than 30% of their income for housing), and contributing to the growth of the houseless community.

Since the Comprehensive Plan was last updated, new laws under GMA require the City to allow a minimum of 4-6 units on single-family lots (HB 1110), plan for and accommodate a minimum of approximately 38,000 new housing units affordable at a range of income bands (HB 1220), allow a minimum of two Accessory Dwelling Units (ADUs) per residential lot (HB 1337), include a Climate Element and greenhouse gas inventory in its updated Plan (HB 1181), and limit minimum required parking (SB 5184), and several other new laws focused on housing production and managing climate impacts. The City Council has directed staff to accommodate a minimum of 43,200 new jobs by 2045 to provide ample employment opportunities within the City. The City Council has also adopted several policy documents that provide guidance on desired outcomes and goals, including: connected and accessible neighborhoods; increased housing at all income levels; efficient use of land; safe multimodal transportation options; aggressive climate action and equitable adaptation; increased access to services and opportunities; and prioritizing community health and wellbeing. To achieve these outcomes, the City’s regulatory framework must be updated to allow a wider and more diverse range of uses and building types.

Once adopted, the Our Vancouver 2026-2045 Comprehensive Plan and Zoning Code will be monitored and updated more frequently through the City’s Annual Review program and periodic code updates, with the next significant citywide plan review required in 2030 per new state regulations for

a five-year review, and the next major update involving new growth forecasts required in 2035. Incremental changes to individual portions of the Comprehensive Plan can be made once per year, in any year. Zoning changes can be made at any time. Parties requesting changes in their property designations can apply to do so beginning in 2027.

Key Drivers and Priorities

The proposed updated 2026-2045 Comprehensive Plan, zoning map and development code are guided by a range of interrelated factors. The below drivers establish the rationale for moving from the existing growth strategy toward a more compact, equitable, and resilient pattern of development.

A Changing Landscape

Vancouver is facing a convergence of pressures that require a new approach to growth. Rising housing costs, increased demand for multimodal transportation, climate change, and evolving community safety and economic conditions all point toward the need for an updated land use plan.

Economic and Employment Trends

Shifts in work and commerce are reshaping how residents want to live and work. Remote work remains a strong factor, while residents also express a clear desire for jobs closer to home, more support for small businesses and local entrepreneurship and more family wage job opportunities. These changes require planning for mixed-use centers and neighborhood business districts that can provide daily needs without long commutes, and thoughtful management of employment land that reflects the evolving local, national and global economy.

A Growing Community

Vancouver is transitioning from a primarily suburban model toward a more urban pattern of development as land resources become scarce. The City's population is projected to increase by approximately 81,000 residents by 2045, and accommodating this growth means moving away from low-intensity greenfield development toward compact, connected neighborhoods. The goal is that daily needs—groceries, schools, parks, childcare, healthcare—can be met within a 15-minute walk from where people live.

Opportunity for All

Addressing disparities in opportunity is central to the community vision for the future of the City. Equal access to housing, jobs, parks, schools, healthcare and services is necessary for all community members to thrive. Increasing the number of connected, accessible neighborhoods with safe and convenient access to essential services is a primary goal of the Plan and reflects Council policy priorities.

Climate Action

The City has committed to net-zero local greenhouse gas (GHG) emissions by 2040. Meeting this target requires strategies that both reduce vehicle miles traveled and prepare neighborhoods to adapt to localized climate impacts such as extreme heat, wildfire smoke, and flooding. Compact growth along corridors and in centers, combined with expanded tree canopy and resilient infrastructure, will help Vancouver adapt to these risks.

Legal and Policy Requirements

There are a number of new state legal requirements for housing, climate and other issues. HB 1110 requires allowing middle housing at densities of 4-6 units per lot in single family zoning districts citywide. HB 1220 requires demonstrating capacity for set numbers of housing units citywide, affordable at different income levels. The City of Vancouver is required to show it can accommodate over 38,000 new housing units, approximately half of them affordable at below market levels. There are also legal requirements to allow two accessory dwelling units (ADUs) per lot, to limit local minimum parking requirements, and other mandates. For the first time, Climate elements are required to be included in updated Comprehensive Plans.

Overview of Process

The proposed Updated Comprehensive Plan and Zoning Code have been developed through a multi-year process beginning in early 2023, involving the Vancouver community, the Planning Commission and City Council and many other organizations, agencies and partners. There have been three distinct phases in advance of the adoption process:

Phase 1: Learning About Our Community / Visioning (Summer 2023-Fall 2023)

- Envision Events, a community survey, and pin map, prior visioning engagement, and the Our Vancouver Community Partners informed the creation of the Vision Statement (below) and Goals Framework for the plan.
- The Vision and Goals Framework, along with the Equity Framework and Community Partnership Framework, were endorsed by City Council on December 18, 2023.
- Additionally, several foundational studies were prepared to understand past, current, and anticipated conditions and inform the plan and code update. These included the Community Atlas, Housing Needs Assessment, Economic Conditions and Opportunities Analysis, Equity Analysis and later a Climate Vulnerability Assessment and Health Impact Assessment.

Vision Statement:

Vancouver is an equitable and prosperous community, which ensures that all residents, businesses and organizations benefit from the growth and advancement we make together. Vancouver will be recognized for our quality of life, as evidenced by affordable housing in vibrant, safe and walkable neighborhoods, access to jobs and economic opportunity for all, and leading-edge efforts to address climate change.

Phase 2: Developing Land Use Alternatives (Winter 2024-Fall 2025)

- Community input from the Community Mapping Activities (Spring 2024), along with Phase 1 engagement listed above, findings from the studies noted above, state laws, City priorities, and Council direction, informed the creation of Land Use Alternative 1 and Land Use Alternative 2.
- Once the Alternatives were finalized, additional outreach was done (November 2024-June 2025) to share the Alternatives with the community and prepare people to provide comments during the upcoming Draft Environmental Impact Statement (Draft EIS) comment period.
- The comments received during the Draft EIS comment period (July 8 – September 8, 2025), along with past community input, Draft EIS findings, state laws, City priorities, and Council direction, informed the creation of the Preferred Land Use Alternative.
- The Preferred Land Use Alternative map (Figure 1) was endorsed via resolution by City Council on December 15, 2025.

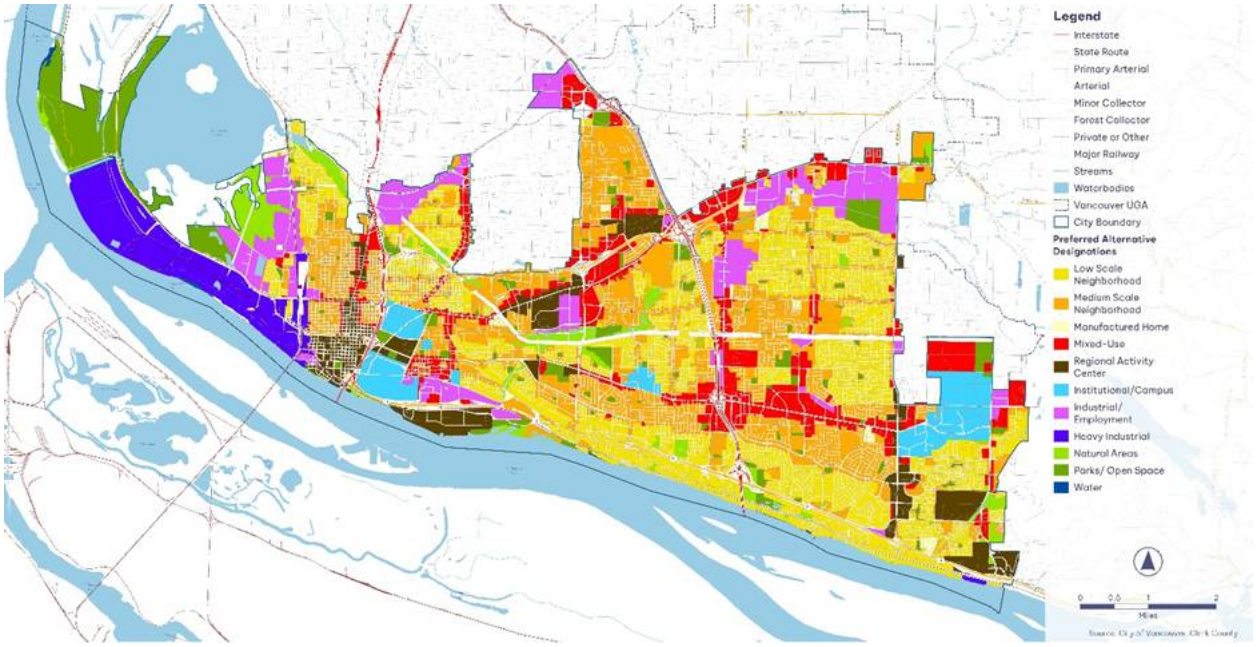


Figure 1. Preferred Land Use Alternative endorsed by City Council on December 15, 2025.

Phase 3: Draft Plan and Development Code (Winter-Spring 2026)

- This phase focused on reporting back and demonstrating how community input, City priorities, and state laws were reflected in the draft plan and code.
- High-level code concepts were introduced to the Council and community as part of the community mapping activities in Phase 2, called “place types” that represented different types, scales and character of development. A more refined code framework including new base districts, minimum densities, maximum building heights, parking, building types, street orientation, the use table and overlays were reviewed with the City Council at workshops on November 18, 2024, and February 2, 2025, and were refined throughout the Phase 3 process, including at Council workshops on January 26 and February 23, 2026. Public
- Review of Draft Plan and Code (February 19 - March 31, 2026)
    - On February 19, 2026, the first drafts of the full plan and code were published for the public to review and weigh-in on. These first drafts were informed by the Goals Framework, community input from Phases 1 and 2, and detailed feedback on plan and code concepts from City and community working groups, the Community Partners, boards and commissions, the Planning Commission, and City Council.
- Council and Commission Refinement
    - At the April 13, 2026 City Council workshop and the April 14, 2026 Planning Commission workshop, the Council and Commission reviewed the second drafts of the Comprehensive Plan and Zoning Code, as well as a summary of community feedback on the first drafts.
    - Feedback received on the first drafts of the plan and code (February 19 – March 31, 2026) that aligned with past community input, state laws, City priorities, and Council direction informed refinements to the plan and code.
    - Then, based on Council and Planning Commission direction at the April 13 and 14 meetings, staff made final refinements before initiating the adoption process.

Adoption Process

- The third drafts of the Our Vancouver 2026-2045 Comprehensive Plan, updated City of Vancouver Zoning Map and updated Zoning Code were brought to the Planning Commission on April 28, 2026 for a duly advertised public hearing, where they unanimously recommended that the Council adopt the proposed new plan, map and code. The third drafts were also shared at the City Council Workshop on City Council Workshop on April 27, 2026.
- The proposed plan, map, and code are supported by the Final Environmental Impact Statement (Final EIS), which was published on April 16, 2026.
    - The Final EIS includes analysis of the Preferred Alternative.
    - Changes and additions since the Draft EIS are shown in underline/strikethrough.
    - The Final EIS also includes responses to substantive comments from the Draft EIS. Common responses are in Chapter 6, beginning on page 250 of the PDF. Responses to individual comments are in Appendix E, beginning on page 340 of the PDF.
- On May 11, 2026, the City Council considered the final drafts of the plan, map and code via consent agenda and read the proposed ordinance adopting all three into the record.
- On June 1, 2026, the City Council will hold a public hearing to adopt the final plan, map and code.

Throughout the process more than 2,000 people have been directly engaged through over 200 meetings, events, workshops, and outreach activities, with more than 2,000 ideas and comments received. A wide variety of engagement and outreach tools has allowed the City to gather both broad and in-depth feedback, reaching thousands more community members through online platforms and citywide communications. There were more than 10,000 visits to the project engagement site during the process, and more than 16,000 views of the online StoryMap. Information was shared through more than 65 Our Vancouver e-newsletters, 11 City e-newsletters, and 14 Office of Neighborhoods e-newsletters, 110 social media posts across four platforms, distributing flyers at more than 40 locations around the City, more than 200 direct emails, and three citywide hard copy newsletters mailed to every address in the City.

The review process has also involved extensive review and discussion with City advisory and decision-making bodies. To date, the Planning Commission has held 25 public workshops and a public hearing. The City Council has held 28 public workshops. The Parks, Recreation and Cultural Services Commission, Transportation & Mobility Commission, Urban Forestry Commission and Central City Redevelopment Authority have also reviewed drafts of the plan, map and code throughout the process.

Proposal
Comprehensive Plan Designations and Zoning Maps

The proposed Our Vancouver 2026-2045 Comprehensive Plan and updated City of Vancouver Zoning Map apply new Comprehensive Plan designations and zoning districts to properties citywide. The updated zoning map, known as the Preferred Alternative (*Figure 1* above), was endorsed by the City Council on December 15, 2025. The Preferred Alternative is also currently available as an online interactive map, and once adopted, the Comprehensive Plan and zoning designations would be available online through the Clark County Maps Online portal.

The updated plan designation and zoning maps have been reviewed and analyzed in compliance with the State Environmental Policy Act (SEPA) through a Final Environmental Impact Statement process (see attachment).

The 10 proposed new Zoning Districts are:

- Low-Scale Neighborhood,

- Medium-Scale Neighborhood,
- Mixed-Use Neighborhood,
- Regional Activity Center,
- Institutional/Campus,
- Industrial/Employment,
- Heavy Industrial,
- Manufactured Home Park,
- Parks, and
- Natural Areas.

The zoning districts are nested under four proposed Comprehensive Plan designations (*Figure 2*):

- Residential Neighborhoods,
- Urban Mixed Use,
- Employment and Industry, and
- Green Space.

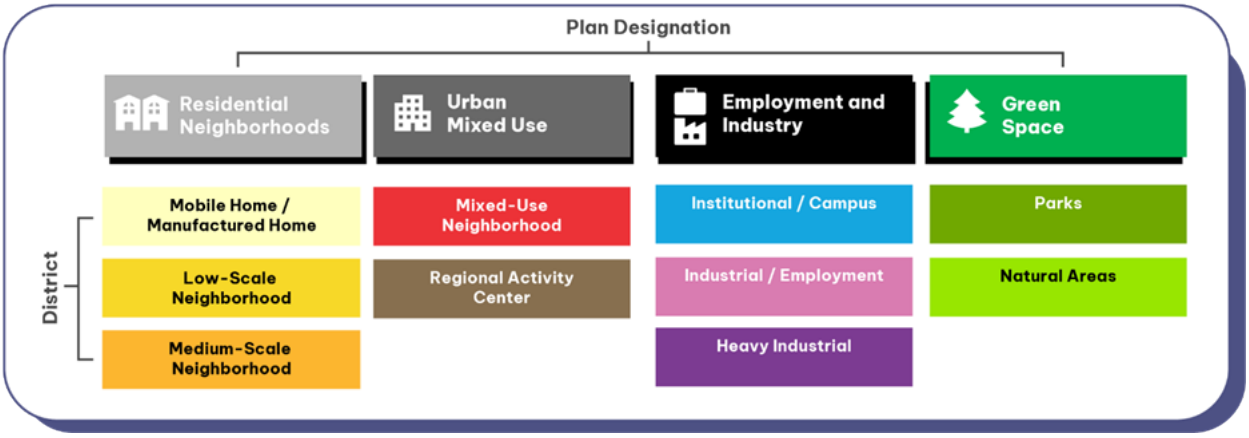


Figure 2. Proposed Comprehensive Plan designations with proposed zoning districts nested underneath.

Updated Comprehensive Plan - Text

The proposed Updated Comprehensive Plan begins with an introduction and the overall community vision statement (*Figure 1* above) followed by ten chapters and an appendix with related plans, policies, and supporting documents and analyses. Each chapter contains background information, a chapter vision statement, chapter-specific goals, and supporting policies, which provide the direction of the Comprehensive Plan. There is also a list of key implementing actions at the end of each chapter.

The proposed Updated Comprehensive Plan is the fourth draft, published on May 5, 2026 . This draft incorporates changes to the first draft (published February 19, 2026), second draft (published April 7, 2026), and third draft (published April 17, 2026).

Changes to the Plan from the first draft (February 19, 2026) to the final draft (May 5, 2026) are summarized by chapter in the following sections. Additional updates were also made throughout the

document related to formatting, consistency, spelling, grammar, and accessibility.

For additional details and recent past discussions on the draft Comprehensive Plan, see City Council materials from January 12, 2026, February 2, 2026, March 16, 2026, April 13, 2026, and April 27, 2026.

Introduction

While the Introduction is not a standalone mandatory element under the Growth Management Act, it serves a critical functional role in establishing the Comprehensive Plan's purpose, scope, and internal consistency under the Revised Code of Washington (RCW) 36.70A. State law requires that all elements of the Comprehensive Plan be internally consistent and grounded in adopted population allocations, growth assumptions, and statutory requirements. The Introduction provides the framework that links required plan elements, outlining the historical context of the community into the present, and establishes the organizing logic for the plan as a whole.

The Introduction also fulfills key procedural requirements by documenting the City's planning context, summarizing community conditions and trends, articulating the community vision, and explaining the role of the Comprehensive Plan in guiding future land use decisions, capital investments, and implementation actions. In this way, the chapter provides the foundation for demonstrating compliance with the GMA and related statutes across all plan elements. The Introduction establishes a shared context and orients readers to the Comprehensive Plan.

The following summarizes changes to the Introduction from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- The School for the Deaf and School for the Blind, and the historical significance of their location in southwest Washington, and role in shaping the Vancouver community. Indigenous communities and economies.
- The importance of the Columbia River to Vancouver's past, present, future and overall identity.
- The community engagement conducted during the planning process and where community feedback is located within each chapter.
- Added definitions for the terms "Public Spaces" and "Community Spaces" to the glossary and updated usage for consistency.
- Added definitions for the terms "Disparities" and "Inequities" to the glossary and updated usage for consistency.

Community Experience

This chapter is a foundational guide for how policy is developed and evaluated across the rest of the Plan from an experiential lens addressing what it is like to live in Vancouver. The chapter establishes that Vancouver's growth strategy must be evaluated not only by physical outcomes, but by how decisions shape daily life and community members' sense of belonging, safety, visibility, connection, and access to places where civic life happens. The chapter frames Community Experience as a citywide priority and a lens that should be applied everywhere in the Plan, particularly for residents who face barriers due to income, race, language, age, disability, gender identity, renter status, or health vulnerability.

The following summarizes changes to the Community Experience chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- The importance of identity to economic vitality and competitiveness;
- The relationship between the built environment and strong social infrastructure;
- Incorporated more data and analysis from the Equity Atlas into the narrative around representation and belonging;
- Recognition of the role that small businesses play in building a culture of belonging and innovation.
- The relationship between the goals in the community experience chapter and the goals of the Parks chapter, including the role of third spaces, sports facilities/leagues, and the fact that public spaces are among the most accessible and widely used places for building social infrastructure.

Equity and Inclusion

Although not required as a standalone component, this chapter is provided in response to requirements that GMA implementation address racially disparate impacts and advance equitable outcomes. Recent state legislation—including requirements related to housing, climate, transportation, and environmental justice—explicitly direct jurisdictions to consider how policies affect historically marginalized and overburdened communities. A central component of the Comprehensive Plan is the use of data-driven tools—including the City's Equity Index, Displacement Risk Assessment, Climate Vulnerability Assessment, and Health Impact Assessment—to guide decision-making and prioritize investment. This chapter also emphasizes accountability, transparency, and meaningful community partnership as essential conditions for achieving equitable outcomes over the 20-year planning horizon.

The following summarizes changes to the Equity and Inclusion chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Recognition of overlapping and compounding impacts of different identities.
- Information on housing stability, renters and eviction risk, and the contributions of renters in the community.
- New policy on Values Driven Budgeting.

Land Use and Development

This chapter is required and establishes the land use framework that supports all other Comprehensive Plan elements. Cities must designate the general distribution and intensity of land uses, including housing, commerce, industry, recreation, and open space, and demonstrate sufficient land capacity to accommodate projected population and employment growth. State law establishes both substantive requirements for what must be included in the land use element and procedural requirements for how land use decisions must be supported, coordinated, and demonstrated through data and analysis. Growth of approximately 38,000 new housing units and 43,200 new jobs is anticipated within current city limits by 2045.

The proposed Plan reflects a continued shift from historic development patterns that emphasized separation of uses toward a more compact, connected, and inclusive urban form. The proposal responds to current realities of limited remaining vacant land, housing unaffordability and underproduction, and widening disparities in access to opportunity. The proposed general Growth Concept envisions future development into a connected network of centers, corridors, and employment districts, and preservation of parks and open space. The framework directs a significant portion of new housing, jobs, and services to places already served—or planned to be served—by

infrastructure, transit, and community amenities, while also allowing for more housing and mixing of uses in neighborhoods around the City. The chapter includes a Connected and Accessible Neighborhoods analysis that demonstrates significant disparities in access to parks, grocery stores, healthcare, services, and transit across the City. The chapter further advances land use policy as a tool to improve economic mobility and address climate change, through policies that emphasize compact development, transit-oriented growth, adaptive reuse of existing buildings, and investments in active transportation.

The following summarizes changes to the Land Use and Development chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Updated Comprehensive Plan designation map to correct mistakes.
- Redrafted policy related to Shared Parking and Redevelopment of Existing Parking to more clearly direct the City to encourage shared parking and redevelopment of existing underutilized surface parking lots.
- Refined information on community feedback to ensure a comprehensive summary.

Housing

This chapter is required and must address the existing and projected housing needs of all economic segments of the community. Cities are required to plan for sufficient land capacity and include goals and policies to accommodate housing growth over the 20-year planning period, while also addressing affordability, housing stability, and access to opportunity. RCW 36.70A.070(2) and WAC 365-196-315, require the housing element must include an inventory and analysis of existing and projected housing needs, identify sufficient land capacity to accommodate those needs, and establish policies to encourage the availability of housing affordable to households at a range of income levels. The Housing chapter must also demonstrate consistency with countywide planning policies, adopted population allocations, and recent state housing legislation related to housing supply, middle housing, STEP (shelters, transitional, emergency and permanently affordable) housing, fair housing, and racially disparate impacts.

The Housing chapter establishes housing as essential infrastructure that underpins community health, economic mobility, climate resilience, and overall quality of life. Technical analysis and engagement conducted during the plan update confirm that Vancouver faces a significant housing supply deficit, rising housing costs, and growing displacement risk, particularly for low-income households, renters, and communities of color. The Housing Needs Assessment identifies the need to accommodate more than 38,000 new housing units by 2045 to meet future growth and address existing shortfalls. Rather than treating affordability and supply as separate issues, the chapter advances a comprehensive housing strategy that links increased housing production, expanded zoning capacity, and targeted affordability interventions. Policies emphasize increasing overall housing supply—including middle housing and higher-density residential development in areas served by transit and amenities—while also expanding affordable and supportive housing options for households most at risk of housing instability.

A central component of the chapter is a focus on housing stability and displacement prevention. The chapter applies an equity and displacement lens to identify neighborhoods where market pressures intersect with vulnerable populations and pairs new housing capacity with policies that preserve existing affordable housing, support homeownership opportunities, and mitigate displacement impacts. Housing policies are intentionally coordinated with land use and economic development strategies to promote job–housing balance, reduce long commutes, and ensure that new investment benefits existing communities.

The following summarizes changes to the Housing chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Added data on City land use applications between 2019 and 2025.
- Updated numbers on housing capacity by zoning district and estimated number of new units in areas with high displacement risk.
- Added language clearly stating draft Plan and code meeting state requirements for Supportive, Transitional, Emergency and Permanently Supportive (STEP) housing.
- Added reference to Capital Facilities Forecast section of Public Services and Facilities Chapter for information on how City services and facilities will serve growth.
- Added more information on City programs and sources for rent-restricted affordable housing.
- Added additional tables from the Housing Needs and Land Capacity Analysis to the Chapter to clearly show where emergency housing and shelters are allowed (i.e., all zoning districts that allow housing) and that the City has sufficient capacity to meet the number of beds assigned to it through the County allocation process.
- Added ADU capacity information.
- Clarifications in response to Department of Commerce feedback.

Economic Opportunity

This chapter is optional under the GMA but proposed for inclusion in recognition of the importance of the issue and Vancouver's role as a regional employment center. Consistent with direction of RCW 36.70A.070(7) and WAC 365-196-435 if economic development elements are included, this chapter addresses existing conditions and historical context, employment trends and industry composition, workforce characteristics and access to opportunity, major employment centers and commuting patterns, and projected job growth and employment land capacity. The chapter prioritizes inclusive economic development, recognizing that a strong economy depends on the ability of residents to access living-wage jobs, career pathways, and entrepreneurship opportunities close to where they live. Rather than focusing solely on job growth or business attraction, the chapter emphasizes economic mobility, workforce access, and support for small businesses and local employers.

A key component of the chapter includes a focus on place based economic development that is integrated with future growth nodes and responsive to community needs. It also reinforces the importance of preserving and strengthening employment lands to ensure Vancouver can continue to support a diverse range of industries, including manufacturing, logistics, healthcare, education, and emerging sectors. Policies emphasize supporting job-housing balance, and directing employment growth to employment centers outlined in the growth framework that are well served by infrastructure and transit. The chapter also integrates equity considerations by prioritizing investments and strategies that address barriers faced by BIPOC communities, LGBTQIA+ residents, people with disabilities, youth, and low-income households.

The following summarizes changes to the Economic Opportunity chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- More clearly connected goal EO-4 Placed-based Economic Development to Policy 15- Align Place-based Investments with the Growth Concept.
- Refined information on community feedback to ensure a comprehensive summary.

Climate and Environment

This chapter is required and must address both climate change mitigation and climate resilience. Cities must reduce greenhouse gas emissions, plan for climate impacts, and integrate climate considerations into land use, transportation, housing, infrastructure, and public facilities planning over the 20-year planning period. RCW 36.70A.070(9) and associated state guidance requires policies to reduce vehicle miles traveled and greenhouse gas emissions, increase energy efficiency, and support a transition to low-carbon systems, as well as to improve community resilience to climate hazards such as extreme heat, flooding, wildfire smoke, and other climate-related risks. The chapter must specifically address environmental justice issues, including how climate impacts and climate investments intersect with equity, recognizing that climate risks and adaptive capacity are not evenly distributed across populations or geographies.

The chapter is supported by two key analytical subcomponents - the City's Climate Vulnerability Assessment and Health Impact Assessment - which provide the technical foundation for the chapter's mitigation, adaptation, and equity-focused policies. Together, these analyses identify where climate hazards such as extreme heat, wildfire smoke, flooding, and air quality impacts are most acute, who is most exposed, and how those risks intersect with existing health disparities and built environment conditions. Incorporating these findings directly into the chapter demonstrates compliance with RCW 36.70A.070(9) by grounding climate policies in locally specific risk, vulnerability, and health data, and by addressing environmental justice considerations as required under state law.

The following summarizes changes to the Climate and Environment chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Added section on Tree Canopy, recognizing it as one of the most effective and visible climate resilience strategies and explicitly tying chapter implementation to the City's Urban Forestry Management Plan.
- Updated Health Impact Assessment (HIA) Index Map caption to better explain what the map shows and how to interpret it.
- Added policy about the Columbia River, its importance to Vancouver and the City's role in preserving and enhancing it.
- Added content about recent City's positions and regulatory actions limiting fossil fuel infrastructure and encouraging renewable fuel sources.
- Added section on the City's Critical Areas Ordinance and Shoreline Master Program, outlining how these provide the regulatory foundation for protecting environmental resources, habitat and shorelines consistent with state guidelines.
- Refined information on community feedback to ensure a comprehensive summary.
- Added language on removing and reducing use of invasive specifies to Policy 103 Pollinator Habitat.
- Updated language in Policy 29 Climate Resilient Spaces and Policy 72 Climate Resilient Development to improve differentiation and clarity.
- Clarifications in response to Department of Commerce feedback.
- Added note about habitat priority areas to the chapter narrative based on feedback from Washington Department of Fish and Wildlife (WDFW)

Parks, Recreation and Cultural Services

This chapter supports the Capital Facilities element, a mandatory component of the Comprehensive Plan under RCW 36.70A.070(3). The Growth Management Act requires cities to plan for adequate public facilities, including parks, recreation facilities, trails, and open space, to serve anticipated

growth over the 20-year planning period. This includes establishing level-of-service standards, identifying facility needs, and demonstrating that planned development can be supported within projected funding capacities. Coordination is also required between parks planning, land use planning, and development regulations to ensure that park acquisition and development keep pace with population growth and changing community needs. The Parks, Recreation and Cultural Services chapter fulfills this role by translating the adopted Vancouver Parks, Recreation and Cultural Services Comprehensive Plan into land use–relevant policy direction and aligning parks planning with the Growth Concept, zoning framework, and capital facilities planning.

The Parks, Recreation and Cultural Services chapter establishes parks, trails, natural areas, and cultural spaces as essential infrastructure that supports community health, climate resilience, equity, and quality of life as Vancouver grows. Technical analysis confirms that while Vancouver has a diverse and valued park system, existing access and level-of-service gaps persist—particularly in historically underserved neighborhoods and areas experiencing rapid growth. Rather than focusing solely on park acreage, the chapter advances a more holistic approach to parks planning that integrates access, quality, equity, connectivity, and climate resilience. Policies emphasize expanding park access within a 10-minute walk, improving the condition and functionality of existing parks, and diversifying park types to meet the needs of a denser, more urban city.

The following summarizes changes to the Parks, Recreation and Cultural Services chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Elevated the role of arts and culture in meeting the goals of the chapter and highlighted connections to the goals and policies in the Community Experience chapter.
- Called out the City's Cultural Access Program that provides a dedicated funding source to expand access to arts and culture across the community.

Transportation and Mobility

This chapter is required and must support anticipated 20-year growth and associated land use plans. It must include provisions for concurrency, level of service, and regional coordination. Also required is an inventory of existing and planned transportation facilities, level-of-service standards- including integration of a new Multimodal Level of Service standard (MMLOS)- and a financing plan to fund system improvements.

The chapter establishes a shift from an auto-centric system toward a people-focused, multimodal transportation network that prioritizes safety, accessibility, equity, and climate outcomes. The chapter relies heavily on the City’s 2024–2044 Transportation System Plan (TSP), which was adopted by City Council in January 2024 following extensive technical analysis and community engagement, and is incorporated by reference into the Comprehensive Plan. Rather than measuring success primarily through vehicle throughput or roadway capacity, the chapter advances a multimodal level-of-service (MMLOS) framework that evaluates how well the system serves people walking, biking, rolling, using small mobility devices, taking transit, driving, and moving freight, in alignment with new requirements. Policies emphasize building low-stress networks, completing sidewalks, adding and improving bike and small mobility facilities, improving transit reliability and frequency, and designing streets to safely accommodate all users.

Equity and safety are central themes. The chapter recognizes that a significant share of Vancouver households do not have access to a vehicle and rely on transit and active transportation to move around the community, and that historically underserved neighborhoods experience higher safety risks and infrastructure gaps than other areas of the City. Transportation investments are

intentionally coordinated with land use, housing, climate, and economic strategies to reduce vehicle miles traveled, lower greenhouse gas emissions, and improve access to jobs, essential services, and community amenities.

The chapter positions transportation planning as a coordinated, ongoing process that aligns the Comprehensive Plan with the TSP, six-year Transportation Improvement Program (TIP), Capital Facilities Plan (CFP), ADA Transition Plan, and regional transportation planning efforts.

The following summarizes changes to the Transportation and Mobility chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Updated Community Streets policy to include community use of the right-of-way and establishment of temporary or permanent pedestrian-only throughfares.
- Updated section on ADA Transition Plan to include language on how this advances City values related to equal access to information, facilities, programs and civic processes and full participation in community life.
- Added Level of Service standards for state highways per state requirements.
- Added Multimodal Level of Service (MMLOS) standards for transit per state requirements.
- Added information from recently completed Multimodal Evaluation and Active Trip Potential analysis and added memo to appendices.
- Required Americans with Disabilities Act Transition Plan added to Plan appendices and referenced in the narrative.

Public Facilities and Services

This chapter is required and must plan for adequate public facilities and services—including water, sewer, stormwater, transportation, parks, fire, police, schools, libraries, and general government facilities—to serve anticipated growth over the 20-year planning period. The chapter must demonstrate that planned development is supported by sufficient infrastructure, consistent with adopted levels of service, concurrency requirements, and funding capacities. It must include an inventory of existing public facilities, a forecast of future needs based on population and employment growth, adopted level-of-service standards, and a capital facilities plan identifying how necessary improvements will be financed. The chapter must also ensure that land use decisions remain consistent with available infrastructure funding and service capacity.

This chapter establishes public infrastructure and services as essential systems that support health, safety, equity, climate resilience, and quality of life as Vancouver grows. Technical analysis confirms that continued population and employment growth will place increasing demands on utilities, transportation systems, emergency services, schools, and community facilities, requiring sustained and strategic investment over the planning horizon. Rather than focusing solely on expansion, the chapter emphasizes maintaining, modernizing, and equitably upgrading existing infrastructure while directing new investment to areas experiencing growth and the impacts of historic underinvestment. Policies prioritize cost-effective, climate-resilient infrastructure that supports compact development patterns, reduces long-term maintenance burdens, and improves system reliability.

Equity is a central theme of the chapter. The chapter recognizes that access to high-quality public facilities and services has not been evenly distributed across the city and commits to prioritizing investments in underserved neighborhoods. The chapter also reinforces the need to upgrade aging City facilities to meet ADA standards, improve seismic resilience, and ensure that public spaces and services are accessible to people of all ages and abilities.

The chapter positions infrastructure planning as a coordinated, ongoing process that links the Comprehensive Plan to functional plans, the Capital Improvement Program (CIP), the Capital Facilities Plan (CFP) and annual budgeting processes. Policies are designed to guide long-term investment decisions, interagency coordination, and transparent prioritization over the life of the plan.

The following summarizes changes to the Public Facilities and Services chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Updated tables to reflect most recent project lists and cost estimates.
- Added policy on Strategic Use of Excess Right of Way to ensure vacation requests are first reviewed for opportunities to add trees/urban canopy, native plants and/or nature spaces.
- Added section on connecting public facilities and infrastructure investments to goals of the Community Experience chapter and emphasizing the opportunity to build community by integrating arts and culture into projects and celebrating completed projects through events and/or programs.
- Added most recent school enrollment numbers (school year 2024) to the enrollment projection table.
- Added language connecting project costs and revenues to ability to serve growth.

Annexation

This chapter is not required, but annexation is governed by state law and shaped by the Growth Management Act (GMA), which envisions cities as the primary provider of urban services, and envisions cities annexing Urban Growth Areas (UGAs) over time. State law (RCW 35A.14) establishes multiple annexation methods, including property owner petition, election-based annexation, annexation of unincorporated islands, interlocal agreement annexation, and municipal-purpose annexation. Each method carries specific procedural and approval requirements. Countywide Planning Policies (CPPs) further guide annexation sequencing, coordination between cities and counties, and the transition of urban services.

This chapter establishes annexation as the primary mechanism for transitioning urbanized areas within the Vancouver Urban Growth Area into the City in a coordinated, orderly, and fiscally responsible manner. Vancouver's UGA is the largest in the state by population, with approximately 170,000 residents, and full annexation would make Vancouver the second largest city in Washington. The scale and level of existing development within the VUGA create both opportunity and constraint. Annexation offers the opportunity to align governance, land use regulation, infrastructure planning, and service delivery across a unified urban area. At the same time, many portions of the VUGA consist of residential neighborhoods with infrastructure that does not yet meet urban standards, creating significant fiscal and capital investment challenges.

The Annexation chapter is written to ensure consistency with these statutory and regional frameworks, while maintaining internal consistency with the Land Use, Public Facilities and Services, Transportation, and Housing elements to ensure that annexation supports planned growth patterns and adopted levels of service. The chapter does not propose a timeline of where or when annexation might occur, instead establishing guidance and evaluation criteria to inform future annexation decisions as opportunities arise.

The following summarizes changes to the Annexation chapter from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Added updated map with City and Vancouver Urban Growth Area (VUGA) boundaries.

- Added language in the Adapting to Changing Conditions section focused on the impacts of potential future annexation on currently unincorporated areas.
- Added language clarifying that levels of service are typically lower in the unincorporated urban areas than inside cities, and why.
- Added demographic information for the VUGA.
- Added language related to increasing costs to upgrade substandard infrastructure and facilities located in the VUGA.
- Updated Goal AN-1 to emphasize the need for sustained coordination between the City and Clark County, including likely pre-annexation adoption of City standards and regulations for development within the VUGA.
- Added language on exploring regional service models to consistently and efficiently provide needed services.
- Updated map showing City of Vancouver and Vancouver Urban Growth Area (VUGA) boundaries to include major street labels and improve legibility.

Appendix

The Appendix includes related plans and policies, as well as supporting documents. Related plans and policies provide background information and policy directives that inform and support Comprehensive Plan analyses, goals, policies, and implementation steps. Some of the plans are adopted by reference to fulfill statutory requirements of Comprehensive Planning under the Growth Management Act. Supporting documents include the Vision and Goals Framework, Equity Framework and Analysis, Housing Needs and Land Capacity Analysis, Climate Vulnerability Assessment, Health Impact Assessment, engagement summaries, and more.

The following summarizes changes to the Appendix from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Added overall, Draft EIS, and Phase 3 engagement summaries.
- Added ADA Transition Plan to appendices per state requirements.
- Added Transit Oriented Development memo to comply with state requirements from HB 1491.

Updated Zoning Code - Text

Title 20 of the Vancouver Municipal Code (VMC), called the Land Use and Development Code or Zoning Code, serves as the primary regulatory vehicle to implement the City's Comprehensive Plan, and by reference, the requirements of the Washington State Growth Management Act (GMA).

The proposed Updated Zoning Code has 10 base zoning districts nested under four Comprehensive Plan designations (Figure 3). The base zoning districts establish minimum residential density and maximum height requirements to support efficient use of land, protect agricultural and natural areas outside of Urban Growth Areas from development, and add more housing to meet the needs of the community. The base zoning districts also establish allowed building types and allowed uses. Some areas also have an overlay. There are also additional development standards, such as parking and tree conservation, that are proposed to be updated.

For additional details and recent past discussions on the draft zoning code, see City Council materials from January 26, 2026, February 23, 2026, April 13, 2026, and April 27, 2026.

Base Zoning Districts (proposed VMC 20.410)

The proposed Updated Zoning Code has 10 base zoning districts (Table 1), while the existing zoning code has 17 zoning districts. The proposed base districts contain minimum density requirements, maximum height, permitted building types and permitted uses. Every parcel within the city will have a base zoning district designation.

The Manufactured Home Park district applies only to existing manufactured home park developments, to support housing affordability and anti-displacement goals. The Parks and Natural Areas districts apply to existing publicly-owned parks and natural areas, supporting goals around access to green space and community health and wellbeing. The other seven other districts allow a range of uses and development intensities. The Industrial/Employment and Heavy Industrial districts are intended to support employment uses and do not allow housing, ensuring adequate land for future jobs and broader jobs-housing balance over time. Low-Scale Neighborhood, Medium-Scale Neighborhood, Mixed-Use Neighborhood, Regional Activity Center and Institutional/Campus districts all allow a mix of housing and commercial uses, at varying ranges, intensities and scales, to facilitate the development of connected and accessible neighborhoods over time. Minimum housing densities support efficient use of limited land supplies, and maximum heights limit scale and intensity of development.

Table 1. Proposed new zoning districts with descriptions of allowed uses, minimum residential density requirements, and maximum height requirements.

District	**Description**	**Minimum Density (units/acre)**	**Maximum Height**
Natural Areas	Includes lands currently zoned for greenways and natural areas.	N/A	N/A
Parks	Lands currently zoned as public community and neighborhood parks.	N/A	N/A
Manufactured Home	Applied to existing manufactured home parks to retain long-term affordability and prevent displacement of existing residents; no other uses allowed unless ongoing use as manufactured home parks demonstrably unfeasible, or if the park is preserved as permanently affordable housing.	None	45 feet
Low-Scale Neighborhood	Allows lower scale, middle housing types and a limited range of neighborhood commercial uses.	8	45 feet, 3 above-grade floors

Medium-Scale Neighborhood	Allows a broad range of housing types and more neighborhood commercial uses.	16	75 feet
Mixed-Use Neighborhood	Allows a broad range of housing, commercial, and civic/institutional use types.	32	110 feet
Regional Activity Center	Allows for a range of commercial, employment, civic and entertainment uses and amenities; facilitates dense housing and mixed-use buildings. Intended to provide activated public spaces that draw people from around the community.	64	None
Institutional / Campus	Includes lands that support academic, civic and medical buildings; a broad range of commercial uses; dense housing types, large campus employment and phased master-planned developments.	None	None
Industrial / Employment	Includes lands with large-scale, single-tenant industrial, warehouse and flex space buildings, and smaller, multi-tenant industrial buildings. No maximum building heights and no new residential uses allowed.	N/A	150 feet
Heavy Industrial	Includes lands that are currently zoned for heavy industrial uses, such as manufacturing and production. No new housing allowed.	N/A	None

Minimum Density (proposed VMC 20.180)

Redevelopment in Low-Scale Neighborhood will not need to meet minimum density—only newly created lots will. For new and redevelopment in Medium-Scale Neighborhoods, minimum density will need to be met except where there are 6 or fewer existing dwelling units that are demolished and will be developed (building permit submitted) with the same number of dwelling units or more within 3 years of demolition, with the potential for a 1-year extension in certain cases.

The proposed Updated Code applies a ratio for purposes of calculating density that is different than

total unit calculations (Table 1). This is intended to incentivize family-sized units and not artificially drive development toward studio and one-bedroom units in order to comply with minimum density requirements.

Table 2. Density Values by Unit Type for Minimum Density Calculations

Unit Type	**Density Value**
Studio / 1 bedroom	1
2 bedrooms	1.25
3+ bedrooms	1.5

While density will not be limited *directly* through the zoning code, it will still be limited indirectly through:

- Site constraints (such as land size, slopes, critical areas, utility easements/transmission lines, etc.),
- Building code requirements (fire, safety, ADA, etc.), and
- Other regulations in the zoning code (maximum building height, required setbacks, maximum impervious area, etc.).

Buffers Between Zoning Districts (proposed VMC 20.410.060)

The proposed Updated Code includes landscape and setback requirements between properties with different zoning when the developing property is considered a higher intensity zoning than the adjacent property. Height reductions, often called step backs, are required within a certain distance of the property line shared with the lower-intensity zoned property. Buffer requirements for project sites abutting properties zoned Manufactured Home, Low-scale Neighborhood, or Medium-Scale Neighborhood are shown below in Table 3. The proposed updated code also includes buffers for Industrial/Employment and Heavy Industrial properties when adjacent to Mixed-use Neighborhood, Regional activity Center, or Institutional / Campus properties. The proposed buffers respond to City Council direction, community feedback, and best planning practices that support the need for thoughtful transitions between different development patterns.

Table 3. Proposed buffers for project sites adjacent to properties zoned Manufactured Home, Low-Scale Neighborhood, and Medium-Scale Neighborhood.

Project Site	**Manufactured**	**Low-Scale**	**Medium-Scale**

	Home		
Manufactured Home	None	None	None
Low-Scale Neighborhood	General landscaping	None	None
Medium-Scale Neighborhood	10’ setback 6’ screen planting 10’-20’: 35’ max height	3’ screen planting	None
Mixed-use Neighborhood	10’ setback 6’ wall planting 10’-20’: 35’ max height	15’ setback 6’ screen planting 15’-20’: 45’ max height	10’ setback 3’ screen planting 10’-15’: 75’ max height
Regional Activity Center	10’ setback 6’ wall planting 10’-20’: 35’ max height	25’ setback 6’ screen planting 25’-30’: 55’ max height	15’ setback 6’ wall planting 15’-20’: 75’ max height
Institutional/ Campus	10’ setback 6’ wall planting 10’-20’: 35’ max height	25’ setback 6’ wall planting 25’-30’: 55’ max height	15’ setback 6’ wall planting 15’-20’: 75’ max height
Industrial/ Employment	25’ setback 6’ screen planting 25’-30’: 35’ max height	35’ setback 6’ berm + planting 35’-40’: 45’ max height	20’ setback 6’ wall planting 20’-30’: 75’ max height

Heavy Industrial	25’ setback 6’ screen planting 25’-30’: 35’ max height	45’ setback 6’ berm + planting 45’-50’: 45’ max height	45’ setback 6’ berm + planting 45’-50’: 45’ max height

Building Types (proposed VMC 20.420)

The base zoning district specifies the building types that are allowed within that district given the intensity and scale of development appropriate for that area. Each building type includes regulations for lot coverage, frontage requirements, building length and parking placement, ensuring that structures are positioned to enhance the public realm. These placement requirements include build-to lines that define how close buildings must be to the street, promoting a strong street presence, as well as guidelines for the location of parking to minimize conflict points. Pedestrian and vehicle access will also be regulated to ensure safe, convenient, and accessible routes to and from the site. These standards will ensure that buildings are appropriately scaled for their context.

Use Requirements (proposed VMC 20.160 and VMC 20.430)

Permitted uses will be associated with each district. Similar to the existing code, the zoning district determines if a use is permitted, conditional or prohibited in the district. Within each base district, uses will be categorized as primary uses, accessory uses or temporary uses. A primary use refers to the principal activity or purpose carried out within the main building or lot. An accessory use is subordinate to the primary use. A temporary use is one that is not permitted outright but is allowed due to temporary, seasonal or the transient nature of the use.

Overlay Districts (proposed VMC 20.500)

Overlay districts recognize that some areas are uniquely important for meeting the City’s policy goals and reducing location-specific impacts. The below list summarizes proposed new overlays, existing overlays that will continue, and existing overlays that are no longer needed to achieve City policy objectives.

The following overlays are proposed new overlays:

- Active Ground Floor Use Required
    - This overlay replaces existing requirements for active ground floor uses in commercial and mixed use zones, which have been a significant barrier to housing production specifically. It significantly reduces the areas where active ground floor uses are required and expands the list of uses that meet this requirement.
- Active Ground Floor Use Ready
    - This overlay requires taller floor to ceiling heights and greater transparency on new ground floor residential uses to make it easier to convert to active commercial uses in the future. This is intended to advance connected and accessible neighborhood form in areas that currently lack services but show little to no market viability for new commercial space.
- Station Areas

    - This overlay eliminates height limits regardless of base district and requires the applicant to demonstrate that any surface parking can be redeveloped in the future. It applies to properties that are within or partially within a quarter-mile radius of all current and future bus rapid transit (BRT) and light rail transit (LRT) stations and complies with the non-affordability related requirements of HB 1491.
- Industrial Holding
    - This overlay applies Heavy Industrial (HI) development standards to Columbia Business Center, until such time as the City and property owners agree to remove the Industrial Holding overlay and allow for development under new Regional Activity Center (RAC) base zone.

The following are existing overlays that are proposed to continue:

- Downtown Overlay
    - Includes downtown specific requirements, including recently updated Downtown Design Guidelines. These Downtown Design Guidelines were previously reviewed by City Council on April 28, 2025 and were recommended for approval by the Planning Commission on July 8, 2025.
- Noise Impact Overlay District
    - Requires additional sound insulation for residential development in areas impacted by unusually high levels of noise due to proximity to aircraft flight paths, railroads and freeways.
- Airport Overlay District
    - Complies with Federal Aviation Administration (FAA) height restrictions related to airport operations.
- Heritage Overlay Districts
    - Currently applies to Main Street generally south of 11th Street and to the Academy site at Evergreen and C Street, and applies standards related to the preservation of buildings listed on the local, state or national lists of historic structures. A third historic overlay is proposed to be added to the Historic Reserve (City and National Parks Service owned lands) to codify existing protections in the new code.

The following overlays are proposed to be removed: Evergreen and Grand Overlay District, Fourth Plain Overlay District, Hough Neighborhood Overlay District, Office Development Overlay District, Surface Mining Overlay District, Transit Overlay District, and the Vision Overlay District.

Additional Development Standards

The below summarizes some of the additional proposed code changes.

Parking Requirements (proposed VMC 20.450.045)

Currently, parking is regulated under Vancouver Municipal Code (VMC) section 20.945. Tables 20.945.070-1 and -2 specify the use types and minimum standards associated with each use. It is well documented that off-street parking requirements tend to drive up the cost of development overall, particularly housing costs, and result in inefficient use of land. In alignment with best practices, the new code does not include minimum or maximum parking requirements, and instead relies on development to determine how much off-street parking is needed to serve intended users.

Some larger uses - like performing arts centers or sports facilities - would still be required to provide off-street parking based on the results of a parking study. The new code will include regulations for parking stall sizes, maneuvering areas, landscaping and lighting that are similar to current standards.

The proposed code includes requirements for a minimum number of short- and long-term bicycle parking spaces based on use for new development or full redevelopment of properties, consistent with policy direction in the City's 2024-2044 Transportation System Plan. Although the existing code has standards for bicycle parking when voluntarily provided, the proposed code is different in that it requires bicycle parking in addition to establishing standards for what that parking looks like. In the proposed code, bicycle parking would not be required for Residential Uses when there are 6 units or less on parent parcel to reduce barriers for the creation of middle housing options. Similarly, a 50% reduction would be allowed when at least half of the dwelling units in a project are affordable to people making 100% of the area median income (AMI) or below to reduce barriers to creating affordable housing.

By-Right Development

The proposed code aligns State Environmental Policy Act (SEPA) exemption thresholds with a Type I administrative review process. This applies to multi-family residential projects of 200 units or less and commercial or office projects of 30,000 square feet or less.

Landscaping and Tree Preservation (proposed VMC 20.450.035)

The proposed code proposes clearer standards and increases preservation requirements for onsite trees that are in fair and good condition and are 12-inch diameter at breast height (DBH) or larger. It specifies that at least 33% of these trees will need to be preserved, while continuing to account for site-specific conditions (e.g., terrain challenges) and right-of-way improvements. The new code also proposes increases in the frequency and size of landscape islands in parking lots to better mitigate heat and manage stormwater. With a changing climate, there is also an increased need for automated irrigation systems to keep trees and landscaping alive and healthy, so the draft code proposes to require these systems for new development.

Non-conformities (VMC 20.190)

The proposed Updated Zoning Code designations are expected to create legally nonconforming properties due to changes in zoning districts and development standards. Under the current code, nonconforming uses are not allowed to expand their existing footprint, which limits how older structures and uses can evolve over time. The new code proposes allowing legally established nonconforming structures and uses to continue and potentially expand, offering more flexibility than the existing rules. Routine repairs and maintenance for nonconforming structures are already permitted and proposed new regulations continue this, including any work required by the Building Official or Fire Marshal. If a nonconforming structure is damaged by a catastrophic event, proposed regulations will still allow it to be rebuilt..

Development Notices

Currently, the City relies heavily on mailed notices to inform nearby residents and property owners about proposed development at a specific site. The new code will continue to include mailed notices while also making updates to comply with state law, support more housing, and provide notice to a wider audience. There will continue to be mailed notices and associated comment periods for subdivisions and developments of more than 200 dwelling units. The mailing radius is proposed to be reduced from 500 feet to 300 feet. In addition to mailed notices, the new code will require a large, posted sign for any development over 6 units. This is a change from current practice where only

projects requiring a public hearing have signs posted, representing a large increase in the number of projects that will be posted and the size of the signs. This change is intended to inform more community members about proposed development, as many may not live near a proposed development but still visit, work, or attend school in the area. The current process does not require any mailed or signage notice for 1–19-unit projects. The increased frequency and size of site posting reflects recent conversations with the City's community engagement team, best practices, and feedback from neighbors across many projects that mailed notice is not an effective way to reach them.

Pre-applications meetings will also be required for developments of 7-19 units. Currently these meetings are required only for projects of 20 or more units, or subdivisions. Community members may opt in to be notified of pre-application meetings and may attend and ask questions at the meeting as time allows. City-recognized neighborhood association leadership will automatically be notified of pre-application meetings for projects within their neighborhood boundaries, consistent with our current practice.

Summary of Changes to Draft Code Since the First Draft (February 19, 2026)

The final draft of the updated Vancouver Municipal Code Title 20 Land Use and Development Code was published on May 5, 2026.

The following summarizes changes to the Code from the first draft (February 19, 2026) to the final draft (May 5, 2026):

- Refinement and clarifications to the Manufactured Home Park district
    - Clarified and simplified definitions to manufactured/modular housing
    - Updated purpose and character description to clarify that repair, replacement and expansion of manufactured housing is allowed in the MH district.
    - Clarification that accessory structures/uses supporting the primary manufactured home park use are allowed, including community and recreational facilities and childcare centers.
    - Allowance of additional building types in the MH District if permanently affordable at 60% AMI or below.
- Clarification that modular and manufactured homes are allowed in all base districts that allow household living provided they comply with development standards.
- Reduction in bicycle/small mobility long-term parking requirements for multi-family housing. February 19 draft required 1 space per unit, updated draft requires 0.75 spaces per unit.
    - Also added language to include small mobility.
- Reduction in ground floor transparency requirements and weather protection for many building types based on stakeholder feedback and energy code requirements.
- Clarified definition of ground to ceiling height to specify that is top of finished floor to bottom of ceiling structure.
- Allowance for increased setbacks for industrial buildings in employment and industrial base districts.
- Refinements to the buffer table and diagram for clarity and readability.
- Childcare allowed everywhere except heavy manufacturing district, City regulations not more restrictive than state.
- Updated annexation section to reflect new base districts and remove outdated terms and language.
- Updated master plan requirements for large sites.
- Updated development agreement section includes public benefit requirements and term expectations.

- Officers of City-recognized neighborhood associations automatically notified of pre-application conferences for projects in their boundaries.
- Updated fee schedule
- Updated maps
- Timeline for exemption from minimum density requirements in the Medium Scale Neighborhood district: extended from one year to three and allows for a one-year additional extension with the Planning Officials approval if the applicant can document the delay is associated with insurance claims, estate resolution or other legal processes.
- Ground Floor Active Uses: exemption to use requirements for emergency service uses.
- Site posting requirements: exemption added for sites that do not have frontage on a street / are not visible from the public right-of-way.
- Addressed a few remaining code section numbering issues for consistency.
- Added updated review fees.
- Added additional language to Industrial Holding overlay to clarify that all existing uses can continue and expand until such time as Industrial Holding overlay is removed.
- Updated allowed uses in Heavy Industrial zone to allow employment services and basic utilities.
- Clarified use allowances in Heavy Industrial code to make it clear that bulk storage, cargo hauling, transloading, laydown yards, assembly of large equipment and stockpiles of dirt/soil/fill materials are allowed uses.
- Replaced references to “landscape plans” with “planting plans” instead to avoid confusion.
- Clarification on landscaping maintenance bonds when property ownership transfers.
- Updated illustrative photos to more fully reflect the range of development types allowed in the Medium Scale Neighborhood district, consistent with what is currently included in the Plan document as well as public engagement materials.
- The Allowable Building Types Table per Zoning District (VMC 20.420.040-1) has been updated to show additional building types allowed if they are at or below 60% AMI in the Manufactured Home Development District.
- The Academy no build figure in VMC 20.550 has been revised to match the updated style and color of the development code.
- Based on stakeholder feedback, staff clarified the vegetative maintenance bond and when it will be required either prior to final plat recording or occupancy depending on the project and associated process.

Review Criteria and Findings

Comprehensive Plan and associated zoning map amendments are evaluated under VMC 20.285.050 of current city code:

20.285.050 Approval Criteria – Comprehensive Plan and Concurrent Zoning Map Amendments.

A. Overall proposed map amendments reviewed under this chapter shall be approved only if demonstrated by the proponent to be in the public interest, as based on a review of all applicable principles from the following:

1. How the proposal is more consistent than the existing designation with applicable policies of the Vancouver strategic plan and comprehensive plan.
2. How the proposal is more consistent than the existing designation with each of the following objectives as applicable:
    a. Encourage more intensive development to locate in major

urban centers and corridors, particularly downtown Vancouver. Encourage development of distinct neighborhoods served by commercial nodes, and discourage urban sprawl and strip commercial development;
   b. Provide development of uses which are functionally integrated with surrounding areas and neighborhoods in terms of local shopping, employment, recreational or other opportunities;
   c. Provide development which is compatible and integrated with surrounding uses in terms of scale, orientation, pedestrian enhancements, and landscaping;
   d. Conserve or enhance significant natural or historical features;
   e. Provide adequate provision of transportation, water, sewer, and other public services;
   f. Provide significant family wage employment opportunities and broadening of the Vancouver economy;
   g. Provide for the formation and enhancement of neighborhoods and communities; and
   h. Provide affordable or below-market-rate housing opportunities.
3. Scope of review. Review and evaluation of proposed comprehensive plan or zoning map changes shall consider both the likely and possible future use of the site and associated impacts.
4. Cumulative Impacts. The review of individual comprehensive plan map or policy amendments, other than exceptions noted in VMC 20.285.040, shall also consider the cumulative transportation, land supply, and environmental impacts of other plan amendments proposed within the same annual cycle.

Comprehensive Plan and Zoning code text designations changes are reviewed under VMC 20.285.070 of current city code:

20.285.070 Approval Criteria – Comprehensive Plan or Zoning Code Text Amendments.

A. Text amendments to the comprehensive plan or VMC Title 20 zoning standards shall demonstrate the following:
   a. The proposal is consistent with applicable policies of the Vancouver strategic plan and comprehensive plan; and
   b. The proposal is necessary to further the public interest based on present needs and conditions.

Staff finds the proposed new Comprehensive Plan and zoning code maps and text to be consistent with the current Vancouver Strategic Plan and Comprehensive Plan and the public interest.

The proposed Comprehensive Plan and zoning map designations, along with the proposed zoning standards, provide sufficient capacity to meet state legal requirements and accommodate more than 38,000 new housing units by 2045, at a range of income brackets, half of them at below market levels. The new designations provide sufficient housing capacity to seriously address the ongoing

housing affordability and accessibility crisis in the City of Vancouver, which has multi-generational impacts throughout the existing Vancouver community, as well as to potential future residents. The new designations and related zoning standards also provide sufficient capacity for job growth needed for the increased population. The current designations would not meet these legal requirements and objectives.

The new designations and associated standards arguably better meet the balance of the locational and functional criteria under VMC 20.285.050.2a than the existing designations. The new designations better provide for development in centers, functionally integrated development, and economic development, with adequate provisions for natural area preservation and public facilities and services. The new designations will allow more intensive residential development which in some cases may raise compatibility concerns with immediately abutting properties, but in most cases these allowances are mandated by state law, and are mitigated by proposed new code provisions such as buffers between differing zoning districts. State law prohibits adopting more stringent development or design standards for middle housing than for single family housing. Based on the experience of other jurisdictions which have previously adopted middle housing allowances, and the projections of economic consultants on the Vancouver Comprehensive Plan update project team, replacement of existing homes in single family zones on standard sized lots with new denser housing is likely to be infrequent. New housing is more likely to be developed on vacant properties or oversized lots.

Staff finds that the proposed new Comprehensive Plan and zoning code map and text are more consistent with the City of Vancouver Strategic Plan than the current Plan, and that the proposed new Plan and code also better align with existing Comprehensive Plan goals and policies given changed circumstances since the last update. This is particularly the case when considering Strategic Plan focus areas of Housing and Human Needs, Economic Opportunity, Vibrant and Distinct Neighborhoods, Culture and Heritage, Safe and Prepared Community, Transportation and Mobility, and Climate and Natural Systems. It is also the case when considering existing Comprehensive Plan policies of the Community Development, Housing, Economic Development, Environment, and Public Facilities and Services chapters.

For these reasons staff finds the proposed new Comprehensive Plan and zoning code map and text further the public interest. The proposed Plan and code provide for a simpler and more flexible policy and regulatory framework for property owners. There are fewer designations and more flexibility in the range of uses allowed in most but not all of the new zoning districts, requiring fewer future zone changes. A greater range of allowed densities enables but does not require affordable housing. Allowances for non-conforming uses have been liberalized. Zoning code development standards have been generally simplified, with more legible language.

Advantage(s)

1. The proposed Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code (VMC) Title 20 Land Use and Development Code balance a range of considerations, including state requirements for comprehensive planning, Council policy priorities, and community input received throughout the Comprehensive Plan update process.
2. The proposed plan, map, and code accommodate projected housing and employment needs through 2045, and addresses local affordability and attainability concerns.
3. The proposed plan, map, and code balance development with preservation of the natural environment.
4. The proposed plan, map, and code distribute growth around the City, providing for balanced growth that ensures impacts are not concentrated and that all areas of the City benefit from

future growth and investment.

Challenge(s)

The proposed Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code (VMC) Title 20 Land Use and Development Code represent significant change and may generate concerns among some community members, although this change will likely occur incrementally over the 20-year planning time-horizon.

Budget Impact

No additional budget impact is associated with this request.

Prior Council Review

The below list of dates reflects Council review of various Comprehensive Plan and code update components from April 2022 through the present. This list is also available on the Comprehensive Plan Update webpage.

- April 04, 2022: City Council Workshop: Comprehensive Plan Initiation and Scope Review
- December 19, 2022: City Council: Professional Services for the Comprehensive Plan and Title 20 Land Use Code Update
- February 06, 2023: City Council Workshop: Comprehensive Plan Update
- February 27, 2023: City Council: Comprehensive Plan Charter Resolution
- March 20, 2023: City Council + Planning Commission WS: Equity Workshop
- June 26, 2023: City Council Workshop: Partnership Framework
- July 03, 2023: City Council Workshop: Equity Framework
- October 02, 2023: City Council Workshop: Goals Framework
- December 18, 2023: City Council: Equity Framework, Community Partnership Framework and Goals Framework
- March 04, 2024: City Council Workshop: Land Use Possibilities – Methods and Assumptions
- April 01, 2024: City Council + Planning Commission: Land Use Possibilities – Activity
- June 17, 2024: City Council Workshop: Comprehensive Plan Update
- September 09, 2024: City Council Workshop: Land Use Possibilities (Part 1)
- September 16, 2024: City Council Workshop: Land Use Possibilities (Part 2)
- November 18, 2024: City Council Workshop: Code Concepts
- February 24, 2025: City Council Workshop: Code Update (Part 2)
- April 07, 2025: City Council Workshop: Goals and Policies (Part 1)
- May 12, 2025: City Council Workshop: Goals and Policies (Part 2)
- July 14, 2025: City Council Workshop: Draft EIS Findings Part 1
- August 04, 2025: City Council Workshop: Draft EIS Findings Part 2
- September 15, 2025: City Council Workshop: Preferred Alternative Part 1
- November 10, 2025: City Council Workshop: Preferred Alternative Part 2
- December 01, 2025: City Council Workshop: Preferred Alternative
- December 15, 2025: City Council Public Hearing: Preferred Alternative
- January 12, 2026: City Council Workshop: Draft Land Use, Housing, and Economic Opportunity Chapters
- January 26, 2026: City Council Workshop: Comp Plan: Title 20 Dev Code Update
- February 2, 2026: City Council Workshop: Draft Equity, Parks, Transportation, Climate, and

Public Facilities and Services Chapters and Introduction
- February 23, 2026: City Council Workshop: Code Details Pt. 2
- March 16, 2026: City Council Workshop: Draft Community Experience and Annexation Chapters
- April 13, 2026: City Council Workshop: Refine Draft Plan and Code
- April 27, 2026: City Council Workshop: Final Draft Plan and Code
- May 11, 2026: City Council Consent Agenda - First Reading

Action Requested

On Monday, June 1, 2026, upon second reading and a public hearing, finalize and approve the ordinance adopting the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code.

Staff Contact

Rebecca Kennedy, Deputy Community Development Director, Mark Person, Senior Planner, rebecca.kennedy@cityofvancouver.us, mark.person@cityofvancouver.us

Attachments:

1. Presentation
2. Ordinance
3. Our Vancouver Comprehensive Plan Update Final Environmental Impact Statement
4. Exhibit A: Our Vancouver 2026-2045 Comprehensive Plan dated as of May 5, 2026
5. Exhibit B: City of Vancouver Zoning Map dated as of May 5, 2026
6. Exhibit C: Vancouver Municipal Code (VMC) Title 20 Land Use and Development Code dated as of May 5, 2026
7. Comments Received since April 1

OUR VANCOUVER

OUR FUTURE 2045

Comprehensive Plan and Code Update

Rebecca Kennedy (she/her), Deputy Director, Community Development
Mark Person (he/him), Senior Planner, Community Development

City Council Public Hearing | June 1, 2026

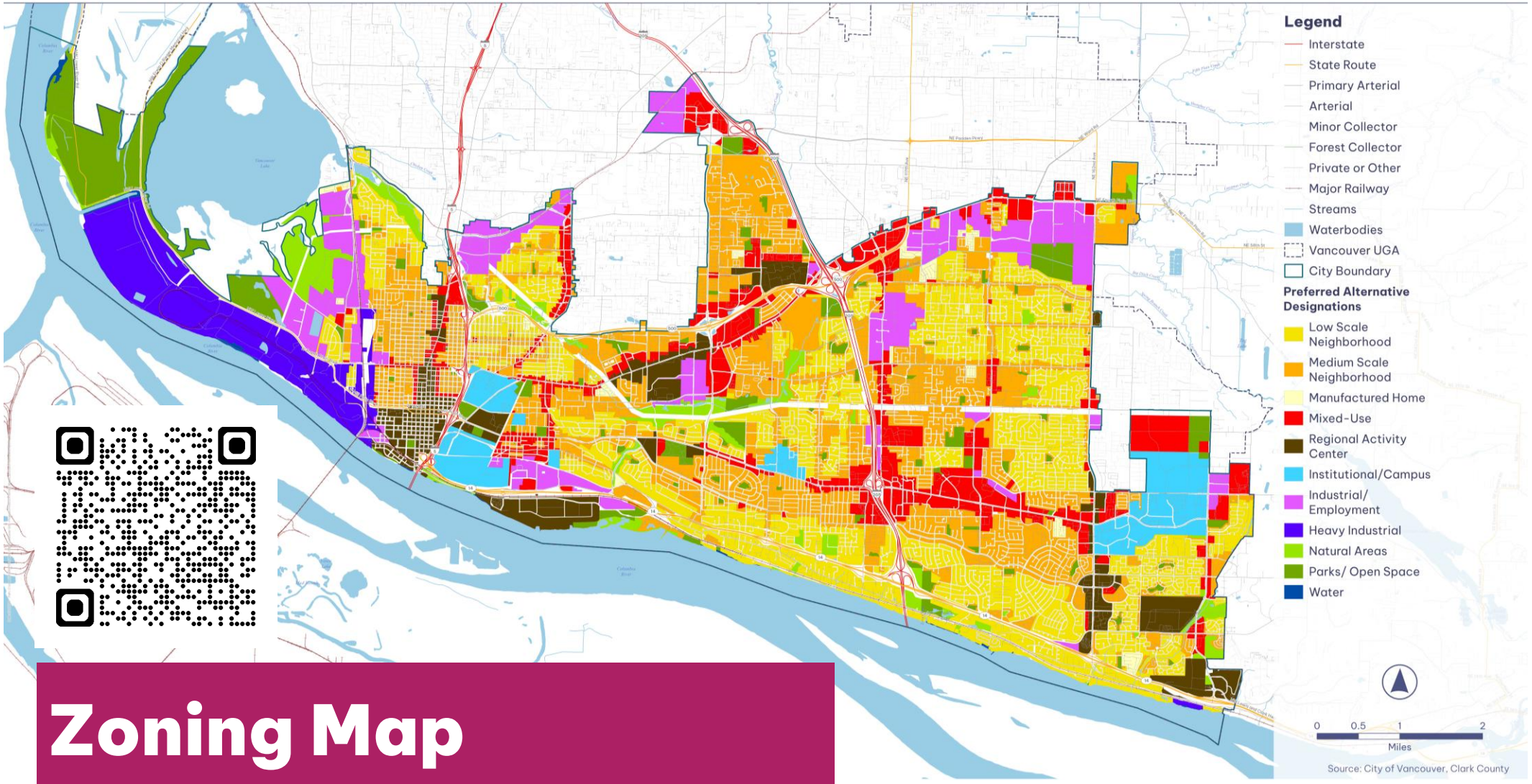
OUR VANCOUVER Comprehensive Plan

- A guide for the city's growth and development through 2045.
- Last updated in 2011
  - ➡ Updating now to manage growth through 2045, meet State requirements, and reflect local values
- 10 chapters, plus introduction and appendix

	2024	Growth	2045 Targets
Population	~200,000	+ 81,000	~281,000
Housing Units	~86,000	+ 38,000	~124,000
Jobs	~100,000	+ 43,200	~143,100

Vancouver is an equitable and prosperous community, which ensures that all residents, businesses and organizations benefit from the growth and advancement we make together.

Vancouver will be recognized for our quality of life, as evidenced by affordable housing in vibrant, safe and walkable neighborhoods, access to jobs and economic opportunity for all, and leading-edge efforts to address climate change.



Zoning Map

www.beheardvancouver.org/plan2045

Zoning Code

New Zoning Districts (10 total)

- ➡ Minimum density
- ➡ Maximum height
- ➡ Allowed building types
- ➡ Allowed uses

Additional Key Regulations

- ➡ Buffers between districts
- ➡ Tree conservation
- ➡ Blank wall, open space, and transparency requirements
- ➡ Minimum density exemptions
- ➡ No parking minimums
- ➡ Updated overlays

Zoning District	Minimum Density (units/acre)	Maximum Height
Manufactured Home	None	45 feet
Low-Scale	8	3 floors, 45 feet
Medium-Scale	16	75 feet
Mixed-Use	32	110 feet
Regional Activity Center	64	None
Institutional / Campus	None	None
Employment/ Industrial	N/A	150 feet
Heavy Industrial	N/A	None
Parks / Open Space	N/A	N/A, or 45 feet
Natural Areas	N/A	N/A, or 45 feet

No maximum density or minimum heights in any district.

Recommendation

Approve ordinance adopting the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code.

Effective date: July 31, 2026

Post-adoption

- ➡ Implement, educate, facilitate, process, refine, fix, learn, adjust, adapt
- ➡ Changes expected to occur incrementally over the next 20 years.
- ➡ Minor updates to the Plan and Code usually happen each year.

Vancouver is an equitable and prosperous community, which ensures that all residents, businesses and organizations benefit from the growth and advancement we make together.

Vancouver will be recognized for our quality of life, as evidenced by affordable housing in vibrant, safe and walkable neighborhoods, access to jobs and economic opportunity for all, and leading-edge efforts to address climate change.

www.beheardvancouver.org/plan2045
OurVancouver2045@cityofvancouver.us

May 11, 2026 (Date of First Reading)
June 1, 2026 (Date of Public Hearing)

ORDINANCE NO. M- [Ordinance Number]

AN ORDINANCE updating and amending the City of Vancouver 2026-2045 Comprehensive Plan, called Our Vancouver, repealing and replacing the City of Vancouver Zoning Map, and repealing and replacing Title 20 Land Use and Development Code of the Vancouver Municipal Code, providing for severability and an effective date.

WHEREAS, pursuant to the Washington State Growth Management Act Chapter 36.70A RCW (GMA), specifically RCW 36.70a.040, the City of Vancouver is a jurisdiction that is required to formally adopt a comprehensive land use plan for managing urban growth and development under the framework defined in the GMA, guided by the land use planning goals set forth in RCW 36.70a.020, and first adopted as the Vancouver Comprehensive Plan under this framework in 1994; and

WHEREAS, pursuant to RCW 36.70a.130, the City of Vancouver is obligated to take legislative action to perform a periodic review of its existing Comprehensive Plan, associated policies, and implementing land use and development regulations on a recurring basis to ensure compliance with GMA requirements, with the current review cycle requiring final adoption on or before December 31, 2025, with approval of proposed changes by City Council anticipated to occur on or before June 30, 2026; and

WHEREAS, the last mandatory periodic update of the Vancouver Comprehensive Plan was in 2011, and the City's implementing land use regulations under Title 20 of the Vancouver Municipal Code (VMC) have not been comprehensively reviewed and updated since 2004; and

WHEREAS, on February 27, 2023, Council approved Resolution M-4210, confirming the Comprehensive Plan Update chartering process and decision-making framework; requiring a defined process to ensure that the overall policy design process is driven through co-creation with disproportionately impacted and historically marginalized populations; including a framework that provides details on how the City will engage entities on a variety of levels throughout the Comprehensive Plan update process, formalized within a detailed public participation plan; including a framework for overarching goals to inform the Comprehensive Plan and implementing development regulations; and updating the land use zoning map for the City to establish the types and scale of buildings allowed to develop in different locations and the uses permitted on land and buildings in the City, all constructed with input from a variety of community engagement and partnership efforts; and

WHEREAS, the proposed amended Comprehensive Plan, updated Zoning Map, and restated Title 20 Land Use and Development Code have been developed through a multi-year public participation program beginning in early 2023 involving the Vancouver community, the Planning Commission and City Council and many other organizations, agencies and partners to ensure public engagement in the development and amendment of the Comprehensive Plan and the implementing zoning map and development regulations, broad dissemination of proposals and alternatives, opportunity for written comments, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments in accordance with RCW 36.70A.140 through three distinct phases: 1) Learning About Our Community/Visioning; 2) Developing Land Use Alternatives; and 3) Developing Goals, Policies, and Code resulting in more than 2,000 people directly engaged through over 200 meetings, events, workshops, and outreach activities, with more than

2,000 ideas and comments received and information shared through more than 65 Our Vancouver e-newsletters, 11 City e-newsletters, and 14 Office of Neighborhoods e-newsletters, 110 social media posts across four platforms, distributing flyers at more than 40 locations around the City, more than 200 direct emails, local news coverage, and three citywide hard copy newsletters mailed to every address in the City; and

WHEREAS, the Our Vancouver 2026-2045 Comprehensive Plan has been developed in regional coordination and consistency with Clark County and other local jurisdictions demonstrating sufficient land capacity to accommodate the formal 20-year employment and housing allocations made by Clark County for the City of Vancouver, including the number of housing units within the range of income bands required and adopting by reference existing Countywide Planning Policies, including amendments being considered by Clark County and local jurisdictions at the time of adoption of this ordinance; and

WHEREAS, in 2021 the Washington State Legislature passed HB 1220 amending the GMA to require all jurisdictions to plan for and accommodate pre-set numbers of housing units, including emergency shelters, affordable to pre-set ranges of income levels, and complete a racially disparate impacts analysis; and

WHEREAS in 2023 the Washington State Legislature passed HB 1110 amending the GMA to require certain cities, including Vancouver, to allow the development of "middle housing" in all predominantly single family residential zones, including to at a minimum allow up to four units per residential lot and up to six units per residential lot if within one-quarter mile walking distance of a major transit stop or if at least two units are affordable; and

WHEREAS, in 2023 the Washington State Legislature passed HB 1181 amending the GMA to require certain cities, including Vancouver, to include a new element in their

comprehensive plans focused on reducing greenhouse gas emissions and strengthening climate resilience; and

WHEREAS, in 2023 the Washington State Legislature passed HB 1337 amending the GMA to require certain cities, including Vancouver, to allow two Accessory Dwelling Units (ADUs) on all residential lots that allow single family homes within an urban growth area, with some limitations and additional policy requirements and providing for preemption of any conflicting provisions in local development regulations; and

WHEREAS, in 2025 the Washington State Legislature passed SB 5184 amending the GMA to impose limits on minimum residential parking requirements; and

WHEREAS, the City reviewed these and all other applicable adopted periodic review statutes for cities planning under the GMA passed subsequent to the City's last major update of the Comprehensive Plan in 2011 and incorporated and addressed all relevant periodic review provisions into the Our Vancouver 2026-2045 Comprehensive Plan; and

WHEREAS, the City prepared and published a Draft Environmental Impact Statement (EIS) in accordance with the State Environmental Policy Act (SEPA) on July 8, 2025, and received public comment during the Draft EIS comment period from July 8, 2025 through September 8, 2025 and issued a Final EIS on April 16, 2026 considering public input; and

WHEREAS, following duly advertised public workshops on September 15, November 11 and December 1, 2025, on December 15, 2025, Council approved Resolution No. M-4364 endorsing a Preferred Land Use Alternative Map based on a framework of the elements set forth in that Resolution; and

WHEREAS, on February 19, 2026, a first full draft of the proposed Our Vancouver 2026-2045 Comprehensive Plan and Vancouver Municipal Code Title 20 Land Use and

Development Code was published for the public to review and provide comment on, and on April 7, 2026 a second draft of the Comprehensive Plan and zoning code was published and reviewed by the City Council at their April 13, 2026 workshop, and on April 17, 2026 a third draft of the proposed Comprehensive Plan and zoning code was published and reviewed at the April 27, 2026 City Council workshop, and a fourth draft of the proposed Comprehensive Plan and zoning code was published on May 5, 2026; and

WHEREAS, pursuant to RCW 36.70A.106 and WAC 365-196-630, a 60-day advance notice of intent to adopt of the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Title 20 Land Use and Development Code of the Vancouver Municipal Code proposed by this Ordinance was submitted to the State of Washington Department of Commerce on February 24, 2026, describing the proposed changes, including draft copies of the full materials, and soliciting agency comments; and

WHEREAS, following duly advertised public workshops on March 10 and April 14, 2026, and after public testimony and deliberation at a duly advertised public hearing on April 28, 2026, and considering public and agency comments and the cumulative impacts of the proposed Comprehensive Plan, zoning map, and development regulation amendments, the Planning Commission unanimously recommended approval of the Our Vancouver 2026-2045 Comprehensive Plan, updated City of Vancouver Zoning Map and updated Title 20 Land Use and Development Code of the Vancouver Municipal Code proposed through this Ordinance; and

WHEREAS, following duly advertised public workshops on March 16, April 13 and April 27, 2026 the City Council held a duly advertised first reading of this Ordinance on May 11, 2026, followed by a duly advertised second reading and public hearing of this Ordinance on June 1, 2026, and considering public and agency comments and the cumulative impacts of approving

the Our Vancouver 2026-2045 Comprehensive Plan, updated City of Vancouver Zoning Map, and updated Title 20 Land Use and Development Code of the Vancouver Municipal Code proposed through this Ordinance; and

WHEREAS, this Ordinance sets forth certain findings of fact and incorporates by reference the findings of fact and studies described in Staff Report _____ dated May __, 2026, demonstrating completion of the periodic update process required under RCW 36.70A.130; and

WHEREAS, this Ordinance concurrently adopts the Our Vancouver 2026-2045 Comprehensive Plan attached hereto as Exhibit A, the City of Vancouver Zoning Map as Exhibit B, and the implementing land use development regulations of Title 20 Land Use and Development Code of the Vancouver Municipal Code attached hereto as Exhibit C because the GMA requires internal consistency and timely adoption of land use and development regulations that appropriately implement the Comprehensive Plan, and thereby repeals and replaces the City's existing 2011-2030 Comprehensive Plan, existing zoning map and existing VMC Title 20 with the respective versions of the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code proposed herein;

WHEREAS, the City Council finds the actions effected through this Ordinance are consistent with and satisfy the statutory requirements of the Growth Management Act and the Vancouver Municipal Code, and will promote the health, safety, and welfare of the general public;

NOW, THEREFORE, BE IT ORDAINED BY THE CITY OF VANCOUVER:

Section 1. Legislative Findings of Fact.

The foregoing recitals are hereby adopted as legislative findings of fact in support of adoption of this Ordinance.

Based on the analysis and findings contained in the staff report for the proposal, documents entered into the public hearing record, public testimony, and discussion at the public hearings regarding the proposals set forth in this Ordinance, the proposed amendments to the City's Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Vancouver Municipal Code Title 20 Land Use and Development Code and all referenced documents are found to be consistent with applicable Vancouver Comprehensive Plan policies and approval criteria, provisions of the Washington Growth Management Act, existing applicable provisions of the Vancouver Municipal Code, other applicable state and federal law, applicable provisions of the Countywide Planning Policies, and Washington Department of Commerce guidance, and are necessary to comply with state law and further the public interest based on present needs and future projected conditions.

Section 2. Adoption of Our Vancouver 2026-2045 Comprehensive Plan.

Upon the effective date established in this Ordinance, the Comprehensive Plan entitled "Our Vancouver 2026-2045 Comprehensive Plan" attached as Exhibit A to this Ordinance and incorporated in its entirety by reference is hereby adopted as the Growth Management Act comprehensive plan for the City of Vancouver in accordance with RCW 36.70A.070 and fulfilling the requirements of RCW 36.70A.130(5)(b). The Our Vancouver 2026-2045 Comprehensive Plan is a complete amendment and restatement of the City's existing Comprehensive Plan, as last updated on January 8, 2024, by Ordinance No. M-4441.

Section 3. Adoption of City of Vancouver Zoning Map

Upon the effective date established in this Ordinance, the City of Vancouver Zoning Map attached as Exhibit B to this Ordinance and incorporated in its entirety by reference is hereby adopted as Vancouver's Zoning Map implementing the Our Vancouver 2026-2045 Comprehensive Plan in accordance with RCW 36.70A.070. The Zoning Map adopted by this Ordinance is a complete map replacement, repealing the City's existing zoning map, as last updated on August 11, 2025, by Ordinance M-4510.

Section 4. Adoption of Amended and Restated Land Use and Development Code – (VMC Title 20).

Upon the effective date established in this Ordinance, Title 20 Land Use and Development Code of the Vancouver Municipal Code (VMC) attached as Exhibit C to this Ordinance and incorporated in its entirety by reference is hereby adopted as Vancouver's land use and development regulations implementing the Our Vancouver 2026-2045 Comprehensive Plan in accordance with the Growth Management Act. The VMC Title 20 Land Use and Development Code adopted by this Ordinance is a complete land use and development regulation code replacement, repealing the City's existing VMC Title 20 Land Use and Development Code, last updated on October 13, 2025, by Ordinance No. M-4517.

Section 5. Severability.

The provisions of this Ordinance are declared to be separate and severable. The invalidity of any clause, sentence, paragraph, subdivision, section, chapter, title, exhibit or other portion of this Ordinance, or the invalidity of the application thereof to any person or circumstance shall not affect the validity of the remainder of this Ordinance, or the validity of its application to other persons or circumstances.

Section 6. Adoption and Effective Date.

For purposes of RCW 36.70A.290, this Ordinance is adopted on the date of final passage noted below and the Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and VMC Title 20 Land Use and Development Code adopted herein become effective on Friday, July 31, 2026.

Section 7. Savings Clause.

Those portions of the existing Comprehensive Plan, zoning map, and Vancouver Municipal Code repealed by this Ordinance shall remain in full force and effect until the effective date set forth in this Ordinance.

Section 8. Submission of Adopted Plan and Code to the State of Washington.

Within ten days after adoption of this Ordinance, the City's Planning Director is hereby directed to send a copy of this Ordinance, with the adopted Our Vancouver 2026-2045 Comprehensive Plan, City of Vancouver Zoning Map, and Title 20 Land Use and Development Code of the Vancouver Municipal Code, to the Washington State Department of Commerce and fulfill all other applicable public notice and publication requirements.

DATE OF FINAL PASSAGE at a Regular Meeting of the Vancouver City Council:

_____.

SIGNED this _____ day of _____, 2026.

_____

Anne McEnerny-Ogle, Mayor

Attest:

_____

Lisa Brandl, Deputy City Clerk

Approved as to form:

_____

Nena Cook, City Attorney

SUMMARY

ORDINANCE NO. _____

AN ORDINANCE updating and amending the City of Vancouver 2026-2045 Comprehensive Plan, called Our Vancouver, repealing and replacing the City of Vancouver Zoning Map, and repealing and replacing Title 20 Land Use and Development Code of the Vancouver Municipal Code, providing for severability and an effective date.

The full text of this ordinance will be mailed upon request. Contact public records staff at (360) 487-8480, citypdr@cityofvancouver.us, or via Public Records Request -The City of Vancouver, WA.

ORDINANCE NO. M- [Ordinance Number]
EXHIBITS (INCORPORATED BY REFERENCE)

EXHIBIT A: OUR VANCOUVER 2026-2045 COMPREHENSIVE PLAN DATED AS OF MAY 5, 2026– ATTACHED

EXHIBIT B: CITY OF VANCOUVER ZONING MAP DATED AS OF MAY 5, 2026– ATTACHED

EXHIBIT C: VANCOUVER MUNICIPAL CODE (VMC) TITLE 20 LAND USE AND DEVELOPMENT CODE DATED AS OF MAY 5, 2026– ATTACHED



OUR VANCOUVER

OUR FUTURE 2045

State Environmental Policy Act Final Environmental Impact Statement

April 2026

Si desea obtener información sobre este proyecto traducida al español, sírvase llamar al 360-487-7937.

Nếu quý vị muốn thông tin về dự án này được dịch sang tiếng Việt, xin gọi 360-487-7937.

Если вы хотите чтобы информация об этом проекте была переведена на русский язык, пожалуйста, звоните по телефону 360-487-7937.

For Americans with Disabilities Act or Civil Rights Title VI accommodations, translation/ interpretation services, or more information call 360-487-7937 or Relay 7-1-1.

April 16, 2026

Subject: OUR VANCOUVER Comprehensive Plan Update Final Environmental Impact Statement

Dear Community Members,

The City of Vancouver invites you to read the OUR VANCOUVER Comprehensive Plan Update State Environmental Policy Act (SEPA) Final Environmental Impact Statement (EIS). This document is a key part of the City's ongoing process to update its Comprehensive Plan and development regulations, which will establish a vision that guides our growth and development for the next 20 years, from 2026 to 2045.

The City is required by the Washington State Growth Management Act (Chapter 36.70A RCW) to adopt an updated comprehensive plan and changes to its land use development and zoning code. The proposed update will plan for growth of at least 38,129 new housing units and 43,198 new jobs by the year 2045. The proposal would update the City's current land use map, as well as rename and simplify its land use designations and associated zoning code.

This nonproject Final EIS is an informational document required by SEPA before the City can move forward with updates to the Comprehensive Plan. The Final EIS provides community members; local, state, and federal government agencies; and tribal governments with qualitative and quantitative information to consider in the decision-making process for the Comprehensive Plan Update.

This Final EIS presents the potential impacts and benefits of four future land use alternatives for the City as a whole:

- **No Action Alternative**, required by SEPA, assumes that the Comprehensive Plan Update and associated changes to the zoning code and development regulations would not be adopted. Future growth and development would occur in line with the current adopted City Comprehensive Plan and development regulations, as well as recent amendments to state law allowing new housing types in single-family zones, which will automatically take effect and override local regulations even if Vancouver does not act. The No Action Alternative would not meet the City's minimum 2045 targets for new housing units and jobs, nor would it comply with recent changes in state law affecting local land use planning.
- **Alternative 1** assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented, including new zoning districts that allow more dense housing, employment, and activity centers in more

areas across the City. Alternative 1 would allow for more dense, mixed-use development patterns than the No Action Alternative but in fewer areas than Alternative 2. Alternative 1 would exceed the City's minimum 2045 targets for new housing units and jobs.

- **Alternative 2**, like Alternative 1, assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. Alternative 2 would allow for the highest density, intensity, and mix of uses of all the alternatives in a greater number of areas of the City. Alternative 2 would exceed the City's minimum 2045 targets for new housing units and jobs and would provide the highest capacity among the alternatives.
- **Preferred Alternative**, which combines elements of Alternatives 1 and 2, and assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. The Preferred Alternative would allow for more dense, mixed-use development patterns compared to the No Action Alternative and would allow for similar development patterns to Alternatives 1 and 2. The Preferred Alternative would exceed the City's minimum 2045 targets for new housing units. The capacity for new housing units and jobs would be higher than the No Action Alternative and slightly lower than Alternatives 1 and 2.

The City published the Draft EIS on July 8, 2025, and invited comments through September 8, 2025. Since then, the City has used this input to develop a Preferred Alternative, analyzed its potential environmental impacts and benefits on the built and natural environment, and developed potential mitigation measures to address impacts, as presented in this Final EIS. The Final EIS also includes responses to comments on the Draft EIS. For more information about the OUR VANCOUVER Comprehensive Plan Update, please visit our website at: https://www.beheardvancouver.org/plan2045

If you have any questions, please contact Meredith Herbst, associate planner, at OurVancouver2045@cityofvancouver.us.

Thank you for your continued interest in Vancouver's future, and we look forward to continuing to work with you as the Comprehensive Plan Update proposal moves forward.

Sincerely,



Chad Eiken, AICP
Director, Community Development, City of Vancouver
SEPA Responsible Official

Fact Sheet

Proposal Title

OUR VANCOUVER Comprehensive Plan Update

Proposal Description

The City of Vancouver (City) is proposing to update its Comprehensive Plan, which will establish a vision that guides the entire City's growth and development for the next 20 years, from 2026 to 2045. The City is required by the Washington State Growth Management Act to adopt an updated comprehensive plan and changes to its zoning code. The proposed update will plan for growth of at least 38,129 new housing units and 43,198 new jobs by the year 2045. The proposal would update the current land use map, as well as rename and simplify existing land use designations and the associated zoning code. This "nonproject" Final EIS reviews the potential impacts of four future alternatives at a high level for the City as a whole, rather than a detailed analysis of an individual site:

- **No Action Alternative,** required by SEPA, assumes that the Comprehensive Plan Update and associated changes to the zoning code and development regulations would not be adopted. Future growth and development would occur in line with the current adopted City Comprehensive Plan and development regulations, as well as recent amendments to state law allowing new housing types in single-family zones, which will automatically take effect and override local regulations even if Vancouver does not act. The No Action Alternative would not meet the City's minimum 2045 targets for new housing units and jobs.
- **Alternative 1** assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented, including new zoning districts that allow more dense housing, employment, and activity centers in more areas across the City. Alternative 1 would allow for more dense, mixed-use development patterns than the No Action Alternative but in fewer areas than Alternative 2. Alternative 1 would exceed the City's minimum 2045 targets for new housing units and jobs.
- **Alternative 2,** like Alternative 1, assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. Alternative 2 would allow for the highest density, intensity, and mix of uses of all the alternatives in a greater number of areas of the City. Alternative 2 would exceed the City's minimum 2045 targets for new housing units and jobs and would provide the highest capacity among the alternatives.

- **Preferred Alternative,** which combines elements of Alternatives 1 and 2, and assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. The Preferred Alternative would allow for more dense, mixed-use development patterns compared to the No Action Alternative and would allow for similar development patterns to Alternatives 1 and 2. The Preferred Alternative would exceed the City's minimum 2045 targets for new housing units. The capacity for new housing units and jobs would be higher than the No Action Alternative and slightly lower than Alternatives 1 and 2.

Proposal Location

Vancouver city limits

Proposal Proponent and Lead Agency

City of Vancouver Community Development Department
City Hall
PO Box 1995
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Proposed Date of Implementation

June 2026

SEPA Responsible Official

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Permits, Licenses, and Approvals Likely Required for Proposal

Vancouver City Council approval, based on recommendations from the Vancouver Planning Commission, is required to implement the proposal. In addition, all Comprehensive Plan amendments and implementing regulations require a 60-day review by the Washington Department of Commerce and other state agencies. The Regional Transportation Council is also required to certify the Transportation Element of the Comprehensive Plan.

After adoption of the Comprehensive Plan Update, individual development proposals would be required to obtain applicable land use, construction, building, and right-of-way permits and conduct additional SEPA review as required by City and state law.

Authors and Principal Contributors to the EIS

With direction from the City of Vancouver, the following consultant team prepared and/or contributed analysis to this Final EIS:

- WSP USA (prime consultant): Overall document management; Land and Shoreline Use; Housing; Aesthetics; Historic and Cultural Preservation; Transportation; Noise; Public Services and Utilities; Earth; Air Quality, Greenhouse Gases and Climate; Water; Plants and Animals
- Alta Planning + Design, Inc.: Transportation
- BERK Consulting: Land and Shoreline Use; Housing; Air Quality, Greenhouse Gases and Climate; Plants and Animals
- Design Workshop: Figures and text adapted from the Community Atlas
- ECONorthwest: Land and Shoreline Use, Housing

Date of Issue of Draft EIS

July 8, 2025

Draft EIS Comment Period

The City requested comments during a 60-day period between July 8 and September 8, 2025, at 11:59 p.m. Comment opportunities were provided via online comment form, email, postal mail and voicemail.

The City hosted two in-person public meetings to allow community members to learn about the Draft EIS, provide comments, and ask questions to City staff:

- July 30, 2025, at Firstenburg Community Center
- August 9, 2025, at City Hall

The City also hosted two virtual public meetings via Zoom on July 22 and August 4, 2025.

Date of Issue of Final EIS

April 16, 2026

Date of Final Action

June 2026

Type and Timing of Additional Environmental Review

This EIS covers the high-level potential impacts of the Comprehensive Plan Update, which is considered a nonproject action. Additional environmental review under SEPA may be required for specific projects resulting from the Comprehensive Plan Update.

Location of Related Environmental Documents and Data

Please visit the Be Heard Vancouver website to view related documents and data for the OUR VANCOUVER Comprehensive Plan 2045:
https://www.beheardvancouver.org/plan2045

Availability/Purchase of Final EIS

The Final EIS, proposed Comprehensive Plan Update and updated code are available for download on the Be Heard Vancouver website:
https://engage.zencity.io/beheardvancouver/en-US/projects/project-documents

Community members may review printed copies of the Final EIS at the front desk of City Hall, 415 W. 6th Street, Vancouver, WA 98660 by appointment. Please contact Community Development staff at OurVancouver2045@cityofvancouver.us or (360) 487-7937 to request an appointment and/or a printed copy of the document for the cost of production.

Distribution List

Tribes

Chinook Tribe
Confederated Tribes of Grand Ronde
Confederated Tribes of the Warm Springs
Confederated Tribes and Bands of the Yakama Nation
Cowlitz Indian Tribe

Federal Agencies

National Park Service – Fort Vancouver National Historic Site
U.S. Army Corps of Engineers

Washington State Agencies

Washington State Department of Agriculture
Washington State Department of Archaeology and Historic Preservation
Washington State Department of Commerce
Washington State Department of Corrections
Washington State Department of Ecology
Washington State Department of Fish and Wildlife
Washington State Department of Health
Washington State Department of Natural Resources
Washington State Department of Social and Health Services
Washington State Department of Transportation
Washington Energy Facility Site Evaluation Council
Washington State Parks and Recreation Commission

Regional/Other Agencies

Lower Columbia Fish Recovery Board
Port of Vancouver
Puget Sound Partnership
Puget Sound Regional Council
Southwest Washington Regional Transportation Council
Southwest Clean Air Agency
Vancouver Housing Authority

County Agencies

Clark County Community Development Department

Clark County Public Health Department

Cities

City of Battle Ground
City of Camas
City of La Center
City of Ridgefield
City of Washougal
City of Woodland
Town of Yacolt

Service Providers

Battle Ground Public Schools
Clark County Public Utilities District (PUD)
Clark Regional Wastewater District
C-TRAN
Evergreen School District
Fort Vancouver Library District
TriMet
Vancouver Public Schools

Community Organizations and Businesses

Alliance for Community Engagement (ACE)
Building Industry Association (BIA) of Clark County
Clark College
Clark County Food Bank
Columbia River Economic Development Council (CREDC)
Columbia Riverkeeper
The Columbian
Council for the Homeless
Cycle Vancouver
East Vancouver Business Association
The Foundation
Fourth Plain Forward
Friends of Clark County
Greater Vancouver Chamber (GVC)
The Historic Trust
Identity Clark County
Latino Leadership Northwest (LLNW)
National Association for the Advancement of Colored People (NAACP) of Vancouver

Native American Youth and Family Center (NAYA)
Neighborhood Traffic Safety Alliance
Odyssey World International (OWI) Education Services
The Oregonian
Southwest Washington Accountable Community of Health (SWACH)
Southwest Washington Equity Coalition (SWEC)
SWWA League of United Latin American Citizens (LULAC) Council #47013
Uptown Village Association
Vancouver Business Journal
Vancouver Downtown Association
Vancouver Farmers Market
Vancouver Neighborhood Alliance
Washington Conservation Action
Washington State University at Vancouver (WSUV)

Active City-Recognized Neighborhood Associations

Airport Green
Arnada
Bagley Downs
Bella Vista
Burnt Bridge Creek
Burton Ridge
Burton-Evergreen
Carter Park
Cascade Highlands
Cascade Southeast
Central Park
Cimarron
Columbia River
Countryside Woods
DuBois Park
East Mill Plain
Edgewood Park
Ellsworth Springs
Emerald Landing
Esther Short
Evergreen Highlands
Evergreen Shores
Father Blanchet Park
Fircrest
First Place
Fisher's Creek
Fisher's Landing East
Forest Ridge
Fourth Plain Village
Fruit Valley
Green Meadows
Harney Heights
Hough
Hudson's Bay
Image
Kevanna Park
Landover-Sharmel
Lewis and Clark Woods
Lincoln
Maplewood
Marrion
Meadow Homes
Mountain View
North Garrison Heights
North Image
Northcrest
Northfield
Northwest
Northwood
Oakbrook
Ogden
Old Evergreen Highway

Parkway East
Riveridge
Riverview
Rose Village
Shumway
Southcliff
Vancouver Heights
Village at Fisher's Landing
Walnut Grove
West Minnehaha
Wildwood
Woodland Meadows

Interested Individuals

The distribution list also includes individuals who submitted comments during the EIS scoping and/or the Draft EIS comment period and others who signed up for email updates on the Comprehensive Plan Update.

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Abbreviations and Acronyms

Acronym/Abbreviation	Term
ADU	accessory dwelling unit
AMI	area median income
AMR	American Medical Response
ATSDR	Agency for Toxic Substance and Disease Registry
BRT	bus rapid transit
CAO	Critical Areas Ordinance
CDC	Centers for Disease Control
CFP	Capital Facilities Plan
CIP	Capital Improvement Plan
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CPU	Clark Public Utilities
City	City of Vancouver, Washington
dBA	A-weighted decibel
DEQ	Oregon Department of Environmental Quality
DS	Determination of Significance

Acronym/Abbreviation	Term
DOH	Washington Department of Health
Ecology	Washington State Department of Ecology
EDNA	environmental designations for noise abatement
EIS	Environmental Impact Statement
EMS	emergency medical services
EPA	U.S. Environmental Protection Agency
Evergreen SD	Evergreen School District
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GMA	Washington State Growth Management Act
HAPT	Housing for All Planning Tool (Washington Department of Commerce)
H.B.	House Bill
I-5	Interstate 5
I-205	Interstate 205
ITS	intelligent transportation system
LOS	level of service

Acronym/Abbreviation	Term
MOVES5	Motor Vehicle Simulator
NAAQS	National Ambient Air Quality Standards
NFPA	National Fire Protection Association
NOx	oxides of nitrogen
NRHP	National Register of Historic Places
OFM	Washington State Office of Financial Management
PIF	Park Impact Fee
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
PM_{10}	particulate matter 10 microns or less in diameter
RCW	Revised Code of Washington
RTC	Regional Transportation Council
S.B.	Senate Bill
SEPA	State Environmental Policy Act
SMP	Shoreline Master Program
SR	State Route
SVI	Social Vulnerability Index
TIP	Transportation Improvement Program

Acronym/Abbreviation	Term
TSP	Transportation System Plan
USFWS	U.S. Fish and Wildlife Service
VBLM	Vacant Buildable Lands Model
VFD	Vancouver Fire Department
VMC	Vancouver Municipal Code
VMT	vehicle miles traveled
VPD	Vancouver Police Department
VPRCS	Vancouver Department of Parks, Recreation and Cultural Services
VPS	Vancouver Public School District
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WSHR	Washington State Heritage Register

Chapter 1: Summary

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. New content in this chapter is generally denoted with underlined text, while changes to information are denoted with strikethrough text. Updates focus on adding the new analysis of the Preferred Alternative, as well as minor corrections and clarifications to the analysis presented in the Draft EIS. Some changes are denoted with footnotes and table notes when further explanation was warranted.

This chapter provides an overview of the ~~Draft~~ Environmental Impact Statement (EIS) and its major findings, including a description of the proposal; its objectives, purpose and need, and location; the environmental review and public involvement process; a summary of the alternatives evaluated in this EIS; potential impacts and mitigation measures for each alternative; significant areas of controversy and issues to be resolved; and benefits and disadvantages of delaying implementation of the proposal.

Description of Proposal, Purpose and Need, and Objectives

The City of Vancouver, Washington (City) is proposing to update its Comprehensive Plan, which will establish a vision that guides its growth and development for the next 20 years, from 2026~~5~~ to 2045. Since the last plan update in 2011, Vancouver has experienced substantial growth, as well as demographic, economic and social changes.

Pursuant to Revised Code of Washington (RCW) 36.70A.070, the Washington State Growth Management Act (GMA) requires that all fully planning jurisdictions, including Vancouver, update their adopted comprehensive plans and development regulations every 10 years. The GMA specifies mandatory elements that Washington cities are legally required to integrate into their comprehensive plans. These elements include land use, housing, capital facilities, utilities, transportation, economic development, parks and recreation, and climate change and resiliency. Through its visioning process, the City has elected to include additional elements that are not mandated by state law, including equity and inclusion, community experience, and annexation.

The purpose of the Comprehensive Plan Update is to set the vision and direction for Vancouver for the next 20 years, including a focus on the following key questions:

- What types of services, facilities, and infrastructure will be needed?
- How can we help make Vancouver a healthier community for all people?
- How will infrastructure and land use be resilient and responsive to natural disasters, threats and unexpected circumstances?
- How will we provide housing that is affordable and accessible to everyone?
- How will the plan's overall vision and investments inform equitable access to opportunity, employment, and the benefits from those investments?

The City has named the forthcoming comprehensive plan OUR VANCOUVER to reflect the process of co-creating the plan with the community. The Comprehensive Plan Update is needed to meet the requirements of the GMA, with ~~and must be adopted by~~ adoption scheduled for December 31, 2025, by statute. As part of this proposal, the City is currently:

- Conducting a full rewrite of the existing Comprehensive Plan, including changes to all existing elements and the land use map.
- Developing a detailed strategy for implementing the goals, policies, and strategies outlined with the revised plan.
- Modifying the existing zoning code (Title 20 of the Vancouver Municipal Code [VMC]), which regulates the scale, size and location of buildings and uses, to reflect the goals and policies identified in the revised plan.
- Completing the EIS process outlined within the State Environmental Policy Act (SEPA).
- Establishing a process to develop and create the plan with members of the community and conduct community engagement activities in a method consistent with ~~state law~~ the GMA.

Plan Vision Statement

"Vancouver is an equitable and prosperous community, which ensures that all residents, businesses and organizations benefit from the growth and advancement we make together. Vancouver will be recognized for our quality of life, as evidenced by affordable housing in vibrant, safe and walkable neighborhoods, access to jobs and economic opportunity for all, and leading-edge efforts to address climate change."

The Comprehensive Plan Update will plan for growth of at least 38,129 new housing units and 43,198 new jobs by the year 2045. These minimum growth targets are based on population projections

from the Washington State Office of Financial Management (OFM), Clark County, recent trends, state law, and City policy to plan for long-term housing and employment needs.

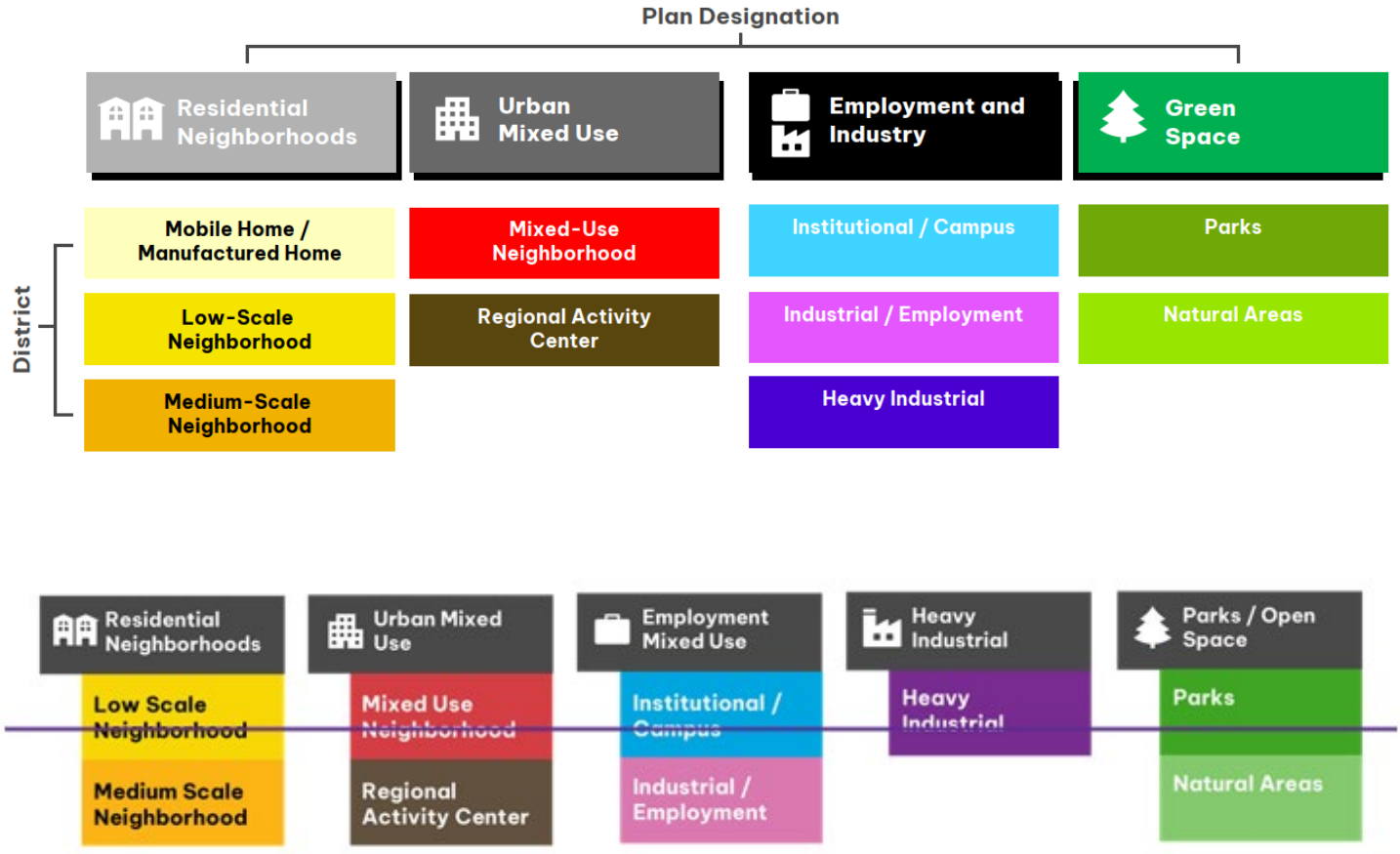
The proposal would also update the current land use map that guides growth and development under the Comprehensive Plan. The Comprehensive Plan land use designations and associated zoning code would be renamed and simplified to focus on the following zoning districts and as shown on Figure 1:

- **Low-Scale Neighborhood:** Focuses on low-scale housing choices, typically with up to six units per parcel and building heights of up to ~~three stories (maximum of~~ 45 feet tall~~)~~. Any lot would be allowed to have at least four units. Housing types include single-family homes, accessory dwellings~~ buildings~~, and a range of housing types referred to as "middle housing," including duplexes (two-unit structures), ~~townhouses~~ townhomes (attached single-family homes), quadplexes (four-unit structures), and sixplexes. Small-scale commercial activities like cafés, salons, professional services, and restaurants mostly serving the surrounding neighborhood would also be allowed.
- **Medium-Scale Neighborhood:** Allows ~~Provides~~ a broad range of housing types and ~~allows~~ building heights ~~of 2 to 5 stories (maximum of~~ up to 75 feet tall~~)~~. Housing types include all of the types allowed in the Low-Scale Neighborhood plus additional multifamily building types, and~~,~~ mixed-use office buildings. ~~including courtyard buildings and multifamily mixed-use buildings.~~ Civic/institutional buildings and commercial activities like cafés, restaurants, small offices, and other retail goods would also be allowed.
- **Manufactured Home:** Applies to existing manufactured home park developments to recognize existing uses, facilitate long-term affordability and discourage displacement of existing residents; no other uses are generally allowed unless ongoing use as manufactured home parks is demonstrated to be unfeasible.
- **Mixed-Use Neighborhood:** Provides for a broad range of housing, commercial, and civic/institutional use types, with building heights ~~of 3 to 8 stories (maximum of~~ up to 110 feet tall~~)~~. Housing types include multifamily and mixed-use buildings at a variety of scales. Commercial or retail uses may include professional offices, medical providers, cafés, restaurants, small grocery stores, markets, and other retail goods and entertainment uses.
- **Regional Activity Center:** Includes lands that offer opportunities for economic, entertainment, civic, and housing needs, with ~~minimum building heights of three stories and~~ no minimum or maximum building heights. Size and makeup of this zoning district would vary based on location but would typically consist of compact, mixed-use development that maximizes residential, commercial, and open space opportunities.

Typical housing options would be mixed-use residential, multifamily ~~apartment~~, and mid-rise ~~and podium~~ buildings.

- **Institutional/Campus:** Includes lands that support academic, employment, civic, or medical buildings, with no minimum or maximum building heights ~~up to 12 stories (maximum of 150 feet tall)~~. Allowable housing types include townhouses, multifamily, and mid-rise buildings. Buildings for athletic facilities, event spaces, equipment or other accessory uses needed to support an educational, medical, or large institution and employment uses would also be allowed.
- **Industrial/Employment:** Includes lands with large-scale, single-tenant industrial, warehouse and flex space building and smaller, multi-tenant industrial buildings up to ~~12 stories (maximum of~~ 150 feet tall~~)~~. ~~The buildings would be grouped to support and serve one another and to provide opportunities for employment clusters.~~ New housing would not be allowed in this zoning district.
- **Heavy Industrial:** Includes lands that are currently zoned for heavy industrial uses, such as manufacturing and production, within the ~~c~~City and would remain unchanged. New housing would not be allowed in this zoning district.
- **Parks:** Includes lands currently zoned as ~~public community and neighborhood~~ parks and open space. Civic and institutional buildings associated with the primary parks use would be allowed, with a height limit of 45 feet. Housing would not be allowed in this zoning district.
- **Natural Areas:** Includes lands currently zoned for greenways and natural areas, which are generally undeveloped lands managed for both natural and ecological value and light-impact recreational use. Housing would not be allowed in this zoning district.

Figure 1. Proposed Comprehensive Plan Designations and Associated Zoning Districts



The proposed zoning code update would allow or require a mixing of uses, depending on the ~~zoning district~~ area; emphasize density minimums and, in some areas, maximum building height~~s and parking maximums~~; and focus on building placement as it relates to the street ~~and building types~~. A major goal of the zoning code update is to make requirements easier and simpler to understand for residents, developers, homebuilders, and staff, and in turn to reduce costs and barriers to housing production.

Proposal Location and Study Area

The primary study area is all of the Vancouver city limits, as shown in Figure 2. The study area includes areas across the ~~c~~City that have been identified as planned growth centers or corridors.

Figure 2. Proposal Location and Study Area



Source: Clark County n.d.

State Environmental Review Process

This nonproject ~~Draft~~ EIS is an informational document required by SEPA, which is regulated under Washington Administrative Code (WAC) 197-11, before the City can move forward with adopting updates to the Comprehensive Plan. A nonproject EIS covers governmental actions

involving decisions on policies, plans or programs, including the adoption or amendment of comprehensive plans, ordinances, rules and regulations. Environmental analysis at the nonproject stage is typically less detailed and is intended to form the basis for future environmental reviews and permitting processes for specific projects.

The ~~Draft~~ EIS provides the public; city, state, and federal government agencies; and tribal governments with qualitative and quantitative information to consider in the decision-making process. It also allows the public, government agencies, interested parties, and tribes to comment on the potential alternatives.

This ~~Draft~~ EIS describes the following:

- Methodology, legal framework and data sources used for the analysis
- Existing conditions (called "affected environment" in this document) of the study area
- A No Action Alternative and ~~two~~ three action alternatives, including a Preferred Alternative
- Potential significant, unavoidable, and adverse impacts
- Potential beneficial outcomes of the alternatives
- Mitigation measures, which are changes or conditions designed to avoid, minimize, or compensate for potential adverse impacts

Community and Partner Engagement

Since early 2023, the City has been engaging in extensive community outreach and engagement to help planners address key questions about housing; land use, development and infrastructure; economic development; equity and opportunity; and climate and environment.

The first year of the process focused on raising awareness about the Comprehensive Plan update process and gathering input from the community to identify a collective vision for the future of Vancouver, as well as vision statements for each element of the Comprehensive Plan. The City met community members where they already were and sought to learn what makes them feel connected to OUR VANCOUVER. The City also invited a group of community partners to co-create the plan with the City. The City has met regularly with community partners to discuss the needs of the communities they serve and identify with, lending a voice from folks outside the typical planning process. In-language liaisons gathered community input to make sure community members could express their needs without language barriers. The City also distributed a community survey to learn more about community members' priorities and vision for future growth.

Throughout 2024, the City reviewed how its land is currently used and how it can be used more efficiently to meet the needs of a growing population. The City held community mapping workshops in the spring to help develop a series of land use possibilities, which were later refined into the two action alternatives analyzed in ~~this~~ the Draft EIS.

Throughout 2025, community engagement focused on the Draft EIS and associated comment period, including preparing the community and elected officials prior to the release of the document, and providing information on how to access the Draft EIS and how to provide comments.

The final phase of engagement in early 2026 focused on reporting back to the community and project participants what staff heard from them previously and demonstrating how input was reflected in the draft 2045 Comprehensive Plan and updated development code. The drafts of the plan and code were shared with the public in February and March 2026 to gather feedback for refining the plan and code details before initiating adoption processes with Planning Commission and City Council in late spring 2026.

EIS Scoping Process

To start the environmental review process, the City issued a SEPA Determination of Significance (DS), which is a public notice stating that this proposal is likely to have a significant adverse impact on the environment. A DS means the proposal to update the Comprehensive Plan has a reasonable likelihood of negative effects on environmental quality that could be considered more than moderate. For proposals that fall into this category, an EIS is required under state law [RCW 43.21C.030 (2)(c)].

The City published this notice in the SEPA Register and *The Columbian* on July 12, 2024, and on the Be Heard Vancouver website for the Comprehensive Plan Update. The City also provided the notice via an email distribution list consisting of federal, state, and local agencies; tribes; community groups; and other interested parties.

The scoping notice initially requested comments during an expanded comment period of 30 days, which is greater than the SEPA-required 21 days. The comment period was originally scheduled to end on August 12, 2024. In order to provide additional opportunities for review and comment by local agencies and communities, the City extended the scoping comment period to August 23, 2024, and again to September 6, 2024. The City issued a revised scoping notice on October 22, 2024, to clarify proposed future growth levels, the number of alternatives that ~~will~~ would be analyzed in the Draft EIS, and the role of desired community outcomes and goals in the Comprehensive Plan Update and SEPA process. The deadline for

comments was November 21, 2024. The scoping notices requested comments via postal mail or email.

The notices identified the City's intent to evaluate the No Action Alternative and two to three action alternatives that outline different land use and growth scenarios in specific areas of the City. The notices also identified the following areas for discussion in the EIS in accordance with WAC 197-11-444:

- Land and shoreline use
- Housing
- Aesthetics (including light and glare)
- Historic and cultural resources
- Transportation
- Noise
- Public services and utilities (including emergency services, water, sewer, schools, parks and recreation)
- Earth (geologic hazard areas, soils, topography)
- Air quality, greenhouse gases, and climate
- Water resources
- Plants and animals

The City received eight comments during the two scoping periods covering a wide variety of topics. Appendix A, Scoping Information, provides a more detailed summary of the comments received. None of the comments included objections to the environmental elements identified in the scoping notice. Most of the comments provided detailed input or questions about specific topics of interest, including EIS elements to be studied, analysis methods, and potential mitigation measures. Based on these comments, the City determined that the topics identified in the scoping notice were appropriate and proceeded with the Draft EIS analysis.

Public Comment on Draft EIS

~~The public comment period for this~~The City published the Draft EIS on July 8, 2025, and requested public comments during a 60-day period ~~from July 8 to~~ through September 8, 2025. Comments ~~may be provided~~ were requested via the following methods:

- Online Comment Form (preferred): https://www.surveyhero.com/c/VancouverDEIS
- Email: OurVancouver2045@cityofvancouver.us

- Postal Mail:
  Meredith Herbst
  City Hall
  PO Box 1995
  Vancouver, WA 98668
- Voicemail: 360-487-7929

The City ~~is also~~ hosted~~ing~~ two public meetings to allow community members to learn about the Draft EIS, provide comments, and ask questions to City staff:

- **Wednesday, July 30, 2025, 4 p.m. to 7 p.m.**
  East Vancouver
  Firstenburg Community Center, Community Room
  700 NE 136th Avenue
  Vancouver, WA 98684
- **Saturday, August 9, 2025, 11 a.m. to 2 p.m.**
  West Vancouver
  City Hall, Aspen Room
  415 W. 6th Street
  Vancouver, WA 98660

The City also hosted two virtual public meetings via Zoom on July 22 and August 4, 2025. The virtual public meetings included approximately 47 attendees and covered topics including state legislation, subarea planning, school capacity, integrating public health, development in the Heights, parking minimums, displacement risk, affordable housing, and senior housing. Please visit the Be Heard Vancouver website for more information about these previous outreach activities. ~~the public meetings and other informal opportunities to review and discuss the Draft EIS with City staff.~~

Final EIS and Next Steps

After the public comment period concluded~~s~~, the City ~~will~~ reviewed the comments received and prepared ~~a~~this Final EIS that considers and responds to comments on the Draft EIS.

Chapter 6 summarizes comments received during the Draft EIS public comment period and provides responses. The City considered these comments when developing the Preferred Alternative, which underwent review by the Planning Commission and City Council during a series of public workshops and meetings held in fall 2025. The City Council endorsed the

proposed Preferred Alternative zoning map on December 15, 2025. The draft Comprehensive Plan document and draft zoning code were published in February 2026 for public review.

This~~e~~ Final EIS ~~will~~ describes the potential impacts and benefits of the~~a~~ Preferred Alternative, which ~~that~~ is within the range of the alternatives studied in the Draft EIS. After issuance of this~~e~~ Final EIS, the City will submit the draft Comprehensive Plan Update and specific edits to the land use map that reflect the Preferred Alternative for review by the Planning Commission and City Council. The Planning Commission and City Council will hold additional public hearings and work sessions to review and receive further public comment on the details and implementation of the Comprehensive Plan Update. Community members will have additional opportunities to provide comments on the proposed Comprehensive Plan Update and land use and zoning code amendments as part of this process.

Summary of Description of Alternatives

This ~~Draft~~ Final EIS evaluates the potential impacts and benefits of ~~three~~ four alternatives:

- The **No Action Alternative,** required by SEPA, is a future scenario that assumes future growth and development would occur in line with the current adopted City Comprehensive Plan and development regulations, and state statutory requirements that impose a state middle housing model zoning ordinance on local jurisdictions which do not take action to allow middle housing in single-family zones. The new zoning districts proposed for the Comprehensive Plan Update and zoning code would not be adopted. The No Action Alternative is not projected to meet the City's minimum 2045 targets for housing units and jobs because it would allow less dense development than the action alternatives.
- **Alternative 1** is a future scenario that assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. Although many areas of the ~~c~~City would have similar land use designations under all alternatives, Alternative 1 would generally accommodate more density and greater mixes of land uses than the No Action Alternative but less density and mixes of uses than Alternative 2. The amount of land designated for Regional Activity Centers, Medium-Scale Neighborhoods, and Mixed-Use Neighborhoods would be lower than under Alternative 2. The amount of land designated as Low-Scale Neighborhoods and Industrial/Employment would be higher under Alternative 1 than Alternative 2. Alternative 1 would exceed the City's minimum 2045 targets for housing units and jobs.
- **Alternative 2** is a future scenario that assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be

implemented. Although many areas of the ~~e~~City would have similar land use designations under all alternatives, Alternative 2 would provide the most options for higher density and greater mixing of~~ed~~ uses in more areas of the city. The amount of land designated as Regional Activity Centers, Medium-Scale Neighborhood, and Mixed-Use Neighborhoods would be the highest of the alternatives. The amount of land designated for Low-Scale Neighborhoods would be the lowest of the alternatives. Alternative 2 would exceed the City's minimum 2045 housing and jobs targets and would have the highest capacity of all the alternatives.

- Preferred Alternative is a future scenario that, like Alternatives 1 and 2, assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. Although many areas of the ~~e~~City y would have similar land use designations under all alternatives, the Preferred Alternative would generally accommodate more density and greater mixes of land uses than the No Action Alternative and a similar mix of land uses compared to Alternatives 1 and 2. The amount of land designated for Industrial/Employment, Low Scale Neighborhood, Medium Scale Neighborhood and Mixed Use would be similar to Alternative 2. The amount of land designated for Regional Activity Center would be similar to Alternative 1. The amount of land designated for Institutional/Campus would be the highest of the alternatives. A new residential zoning district, Manufactured Home, has been added since evaluating the No Action Alternative and Alternatives 1 and 2 to preserve long-term affordability in existing manufactured home parks. The Preferred Alternative would exceed the City's minimum 2045 housing and jobs targets. The capacity for new housing units and jobs would be higher than the No Action Alternative and slightly lower than Alternatives 1 and 2.

Chapter 2 provides a more detailed description of each alternative, including figures showing their major elements and a comparison of their features.

Summary of Impacts, Benefits and Mitigation Measures

Table 1 summarizes the impacts and benefits of each alternative studied in the EIS, as well as the proposed measures to avoid, minimize, or mitigate adverse impacts.

Table 1. Summary of Potential Impacts and Benefits by Alternative

Element of the Environment	No Action	Alternative 1	Alternative 2	Preferred Alternative
Land and Shoreline Use	• Not consistent with proposed Comprehensive Plan Update and associated policies • Does not meet housing and jobs growth targets • Some potential for land use compatibility issues • Lowest capacity for new jobs; similar average wages for new jobs among all alternatives • Lowest potential for commercial displacement, fewer new spaces for businesses	• Consistent with proposed Comprehensive Plan Update and associated policies • Exceeds housing and jobs growth target • Some potential for land use compatibility issues • Substantially higher capacity for new jobs than No Action; similar average wages for new jobs among all alternatives • Moderate potential for commercial displacement, more new spaces for businesses	• Consistent with proposed Comprehensive Plan Update and associated policies • Exceeds housing and jobs growth target by higher amount than Alternative 1 • Some potential for land use compatibility issues • Highest capacity for new jobs; similar average wages for new jobs among all alternatives • Similar potential for commercial displacement to Alternative 1	• Consistent with proposed Comprehensive Plan Update and associated policies • Exceeds housing and jobs growth target by lower amounts than Alternatives 1 and 2 • Some potential for land use compatibility issues • Substantially higher capacity for new jobs than No Action; similar average wages for new jobs among all alternatives • Similar potential for commercial displacement to Alternative 1 and 2
Housing	• Lowest capacity for new housing units, does not meet growth targets • Lowest potential for diversity of housing types and affordable housing supply • Highest potential for new housing units in displacement risk areas • Lowest capacity for new housing units in connected and accessible neighborhoods • Least compatible with existing housing plans and policies	• Higher capacity for new housing units than No Action, exceeds growth targets • Higher potential for diversity of housing types and affordable housing supply than No Action • Lowest potential for new housing units in high displacement risk areas • Higher capacity for new housing units in connected and accessible neighborhoods • Highly compatible with existing housing plans and policies	• Highest capacity for new housing units, exceeds growth targets • Highest potential for diversity of housing types and affordable housing supply • Moderate potential for new housing units in high displacement risk areas • Highest capacity for new housing units in connected and accessible neighborhoods • Similarly compatible with existing housing plans and policies compared to Alternative 1	• Similar to Alternative 1 in capacity for new housing units, exceeds growth targets • Similar to Alternative 1 in potential for diversity of housing types and affordable housing supply • Higher potential for new housing units in high displacement risk areas than Alternatives 1 and 2 • Similar to Alternative 2 in capacity for new housing units in connected and accessible neighborhoods • Similarly compatible with existing housing plans and policies compared to Alternatives 1 and 2
Aesthetics	• Some changes to visual setting through new development but overall modest impacts to aesthetics • Lowest potential for aesthetic improvements associated with	• Moderate potential for larger-scale buildings and associated light, glare, shadow and visual impacts compared to No Action • Moderate potential for aesthetic improvements associated with	• Moderately higher potential for larger-scale buildings and associated light, glare, shadow and visual impacts than Alternative 1	• Moderately higher potential for larger-scale buildings and associated light, glare, shadow and visual impacts than Alternative 1

Element of the Environment	No Action	Alternative 1	Alternative 2	Preferred Alternative
	redevelopment of parking lots and vacant lots and structures	redevelopment of parking lots and vacant lots and structures	• Highest potential for aesthetic improvements associated with redevelopment of parking lots and vacant lots and structures	• Moderate potential for aesthetic improvements associated with redevelopment of parking lots and vacant lots and structures
Historic and Cultural Preservation	• Lowest potential for disturbance of individual sites and associated impacts to cultural, archaeological and historic resources	• Moderate potential for disturbance of individual sites and associated impacts to cultural, archaeological and historic resources	• Similar potential for disturbance of individual sites and associated impacts to cultural, archaeological and historic resources compared to Alternative 1	• Similar potential for disturbance of individual sites and associated impacts to cultural, archaeological and historic resources compared to Alternatives 1 and 2
Transportation	• Lowest total daily citywide vehicle miles traveled (VMT); highest VMT per household • Similar mode split (vehicle/transit/walk/bike) and average trip length for all alternatives • Generally lowest mobility units (person miles per day) • Generally lowest projected new traffic volumes on ~~e~~City safety corridors	• Higher total daily citywide VMT; lower VMT per household than No Action • Similar mode split (vehicle/transit/walk/bike) and average trip length for all alternatives • Generally higher generation of mobility units (person miles per day) • Generally higher projected new traffic volumes on ~~e~~City safety corridors	• Similar total daily citywide VMT to Alternative 1; lowest VMT per household • Similar mode split (vehicle/transit/walk/bike) and average trip length for all alternatives • Generally highest generation of mobility units (person miles per day) • Generally highest projected new traffic volumes on ~~e~~City safety corridors	• Similar total daily citywide VMT and VMT per household to Alternatives 1 and 2 • Similar mode split (vehicle/transit/walk/bike) and average trip length for all alternatives • Generally more similar to Alternative 1 in generation of mobility units (person miles per day) • Generally similar or lower traffic volumes on City safety corridors compared to Alternatives 1 and 2.
Noise	• Lowest potential for substantial construction noise impacts in residential/noise-sensitive areas • Lowest potential for increased transportation noise impacts in residential/noise-sensitive areas • Similar capacity for new housing units in areas with high transportation noise for all alternatives	• Moderate potential for substantial construction noise impacts in residential/noise-sensitive areas • Moderate potential for increased transportation noise impacts in residential/noise-sensitive areas • Similar capacity for new housing units in areas with high transportation noise for all alternatives	• Highest potential for substantial construction noise impacts in residential/noise-sensitive areas • Highest potential for increased transportation noise impacts in residential/noise-sensitive areas • Similar capacity for new housing units in areas with high transportation noise for all alternatives	• Higher potential for substantial construction noise impacts in residential/noise-sensitive areas • Higher potential for increased transportation noise impacts in residential/noise-sensitive areas • Highest capacity for new housing units in areas with high transportation noise
Public Services and Utilities	• Lowest new demand citywide for public services and utilities, including firefighters; police	• Higher new demand citywide for public services and utilities, including firefighters; police	• Highest new demand citywide for public services and utilities, including firefighters; police	• Higher new demand citywide for public services and utilities, including firefighters; police

Element of the Environment	No Action	Alternative 1	Alternative 2	Preferred Alternative
	officers; schools; parks and recreation facilities; water, wastewater, and sewer services; energy; and solid waste services • Most new demand projected in Central and East Vancouver	officers; schools; parks and recreation facilities; water, wastewater, and sewer services; energy; and solid waste services • Similar geographic distribution of new demand for ~~both~~ action alternatives, with lowest new demand projected in West Vancouver and highest new demand projected in East Vancouver	officers; schools; parks and recreation facilities; water, wastewater, and sewer services; energy; and solid waste services • Similar geographic distribution of new demand for ~~both~~ action alternatives, with lowest new demand projected in West Vancouver and highest new demand projected in East Vancouver	officers; schools; parks and recreation facilities; water, wastewater, and sewer services; energy; and solid waste services • Similar geographic distribution of new demand for action alternatives, with lowest new demand projected in West Vancouver and highest new demand projected in East Vancouver
Earth	• Similar consistency with ~~e~~City regulations for geologic hazard areas for all alternatives • Lowest potential for ground disturbances, potential erosion, and increases in impervious surfaces	• Similar consistency with ~~e~~City regulations for geologic hazard areas for all alternatives • Higher potential for ground disturbances, potential erosion, and increases in impervious surfaces	• Similar consistency with ~~e~~City regulations for geologic hazard areas for all alternatives • Similar potential for geologic hazard and erosion risks to Alternative 1. • Greatest potential for ground disturbances and increases in impervious surfaces	• Similar consistency with City regulations for geologic hazard areas for all alternatives • Similar potential for ground disturbances, potential erosion, and increases in impervious surfaces to Alternatives 1 and 2
Air Quality, Greenhouse Gases and Climate	• Lower modeled 2045 air pollutant and greenhouse gas emissions than existing conditions • Similar capacity for new housing units in areas with air pollutant exposure risks for all alternatives • Lowest capacity for new housing units and jobs in heat islands • Lowest potential for construction-related air quality impacts	• Lower modeled 2045 emissions than existing conditions, higher modeled emissions than No Action Alternative • Similar capacity for new housing units in areas with air pollutant exposure risks for all alternatives • Highest capacity for new housing units and moderate capacity for new jobs in heat islands • Higher potential for construction-related air quality impacts	• Lower modeled 2045 emissions than existing conditions, similar modeled 2045 emissions to Alternative 1 • Similar capacity for new housing units in areas with air pollutant exposure risks for all alternatives • Moderate capacity for new housing units and highest capacity for new jobs in heat islands • Highest potential for construction-related air quality impacts	• Lower modeled 2045 emissions than existing conditions, similar to modeled 2045 emissions to Alternatives 1 and 2 • Similar capacity for new housing units in areas with air pollutant exposure risks for all alternatives • Lower capacity for new housing units and jobs in heat islands • Higher potential for construction-related air quality impacts
Water	• Lowest potential for new impervious surfaces (e.g. rooftops, pavement) and associated runoff, but lower density could pressure	• Higher potential for new impervious surfaces and associated runoff • Higher potential for new development subject to updated	• Highest potential for new impervious surfaces and associated runoff • Highest potential for new development subject to updated	• Higher potential for new impervious surfaces and associated runoff, more similar to Alternative 1

Element of the Environment	No Action	Alternative 1	Alternative 2	Preferred Alternative
	development of more individual sites • Lowest potential for new development subject to updated Critical Areas regulations and stormwater management best practices	Critical Areas regulations and stormwater management best practices	Critical Areas regulations and stormwater management best practices	• Higher potential for new development subject to updated Critical Areas regulations and stormwater management best practices
Plants and Animals	• Lowest potential for new construction and/or redevelopment and associated impacts to vegetation and habitat areas • Lowest potential for new development subject to updated Critical Areas regulations protecting plants and animals • Lowest capacity for new housing units in areas with existing low tree canopy cover	• Higher potential for new construction and/or redevelopment and associated impacts to vegetation and habitat areas • Higher potential for new development subject to updated Critical Areas regulations protecting plants and animals • Moderate capacity for new housing units in areas with existing low tree canopy cover	• Highest potential for new construction and/or redevelopment and associated impacts to vegetation and habitat areas • Highest potential for new development subject to updated Critical Areas regulations protecting plants and animals • Highest capacity for new housing units in areas with existing low tree canopy cover	• Higher potential for new construction and/or redevelopment and associated impacts to vegetation and habitat areas, more similar to Alternative 1 • Higher potential for new development subject to updated Critical Areas regulations protecting plants and animals • Higher capacity than Alternative 1 and lower capacity than Alternative 2 for new housing units in areas with existing low tree canopy cover

Significant Areas of Controversy and Issues to be Resolved

The key issues to be resolved by decision makers regarding the OUR VANCOUVER Comprehensive Plan Update proposal include:

- Finalization and adoption of the Comprehensive Plan Update through a public process
- Finalization and adoption of associated land use and zoning code updates
- Development and implementation of policies to address issues regarding:
    - What types of services, facilities, and infrastructure will be needed to support Vancouver's future
    - How to make Vancouver a healthier community for all people
    - How to set up infrastructure and land use to be resilient and responsive to natural disasters, threats and unexpected circumstances
    - How to provide affordable and accessible housing for everyone in a way that is well-integrated with the city's existing built and natural environment
    - How to provide equitable access to opportunity, employment, and the benefits from the plan's investments

Benefits and Disadvantages of Delaying Implementation

If the City does not implement the Comprehensive Plan Update, growth in Vancouver would continue under the current Comprehensive Plan and zoning designations. In single-family neighborhoods, growth would also be enabled by imposition of the state model middle housing ordinance, which by law is applied when cities make no changes to their zoning code. However, this growth would generally not be consistent with GMA requirements to adopt a new Comprehensive Plan and zoning standards to accommodate new 20-year growth forecasts.

Updating the Comprehensive Plan will bring the City up to date with recent changes to state law to address housing and climate needs, land use changes, and population growth projections. The plan update will inform the City's future decisions about land use, housing, public facilities, parks and open space, economic development, historic preservation, community design, and environmental considerations to meet the needs of a growing population.

Chapter 2: Alternatives

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. New content in this chapter is generally denoted with underlined text, while changes to information are denoted with strikethrough text. Updates focus on adding the new analysis of the Preferred Alternative, as well as minor corrections and clarifications to the analysis presented in the Draft EIS. Some changes are denoted with footnotes and table notes when further explanation was warranted.

This chapter provides a more detailed description of the proposal location, study area, and ~~three~~ four alternatives studied in this ~~Draft~~ Final EIS, including figures showing their major features.

Proposal Location and Study Area

The proposal location and study area consist of lands within Vancouver city limits, as shown in Figure 3.

The study area contains areas across the ~~c~~City that have been identified as existing or planned growth corridors and existing or planned centers of activity.

Many of these areas are linear corridors along arterial streets or transit routes, such as Main Street, Mill Plain Boulevard, Fourth Plain Boulevard, West 39th Street, West 33rd Street, 112th Corridor, Northeast 136th Avenue, Southeast 164th Avenue, and Southeast 192nd Avenue.

Other identified growth nodes include the Port of Vancouver, Fruit Valley, Downtown, Clark College, Vancouver Mall, The Heights, Garrison Square, PeaceHealth, Section 30, Columbia Tech Center, and Vancouver Innovation Center. Slower growth is anticipated outside of these nodes.

Figure 3. Proposal Location and Study Area



Source: Clark County n.d.

Description of Alternatives

This ~~Draft~~ Final EIS studies the potential effects of the No Action Alternative and ~~two~~ three action alternatives, Alternative 1, ~~and~~ Alternative 2 and the Preferred Alternative, as described in the next subsections.

No Action Alternative

The No Action Alternative, required by SEPA, is a future scenario that assumes future growth and development would occur as allowed under current adopted City Comprehensive Plan and development regulations, and recent amendments to state statutory requirements that contain self-executing provisions.

The No Action Alternative assumes the implementation of House Bill (H.B.) 1110, which generally requires cities of at least 75,000 people to permit "middle housing" of at least four homes per residential lot, and imposes a new state model ordinance permitting middle housing in single-family zones on local jurisdictions that do not adopt their own standards allowing this practice. However, the No Action Alternative does not assume the implementation of other state laws that do not contain self-executing provisions, such as H.B. 1220, which requires planning for and accommodating housing affordable to all economic segments of the population, and H.B. 1337, which requires cities like Vancouver to allow up to two accessory dwelling units (ADUs) on a residential lot, assuming development regulations are met.

Under the No Action Alternative, the Comprehensive Plan land use designations would remain the same as they are today. The Comprehensive Plan Update and associated new zoning code and development regulations would not be adopted, although the state model ordinance permitting middle housing in single-family zones would be imposed in accordance with H.B. 1110.

Figure 4 shows a map of the Comprehensive Plan land designations for the No Action Alternative, and Figure 5 shows a map of the zoning designations for the No Action Alternative. These designations would be the same as the existing Comprehensive Plan and zoning designations. To allow for a comparison between the no action alternative and action alternatives, Table 2 summarizes the proposed future zoning districts and their corresponding current Comprehensive Plan land use and zoning designations. Table 5 in Chapter 3 provides more detailed information about current Comprehensive Plan designations and corresponding zoning designations, which would remain the same under the No Action Alternative.

Figure 4. No Action Alternative Comprehensive Plan Designations Map

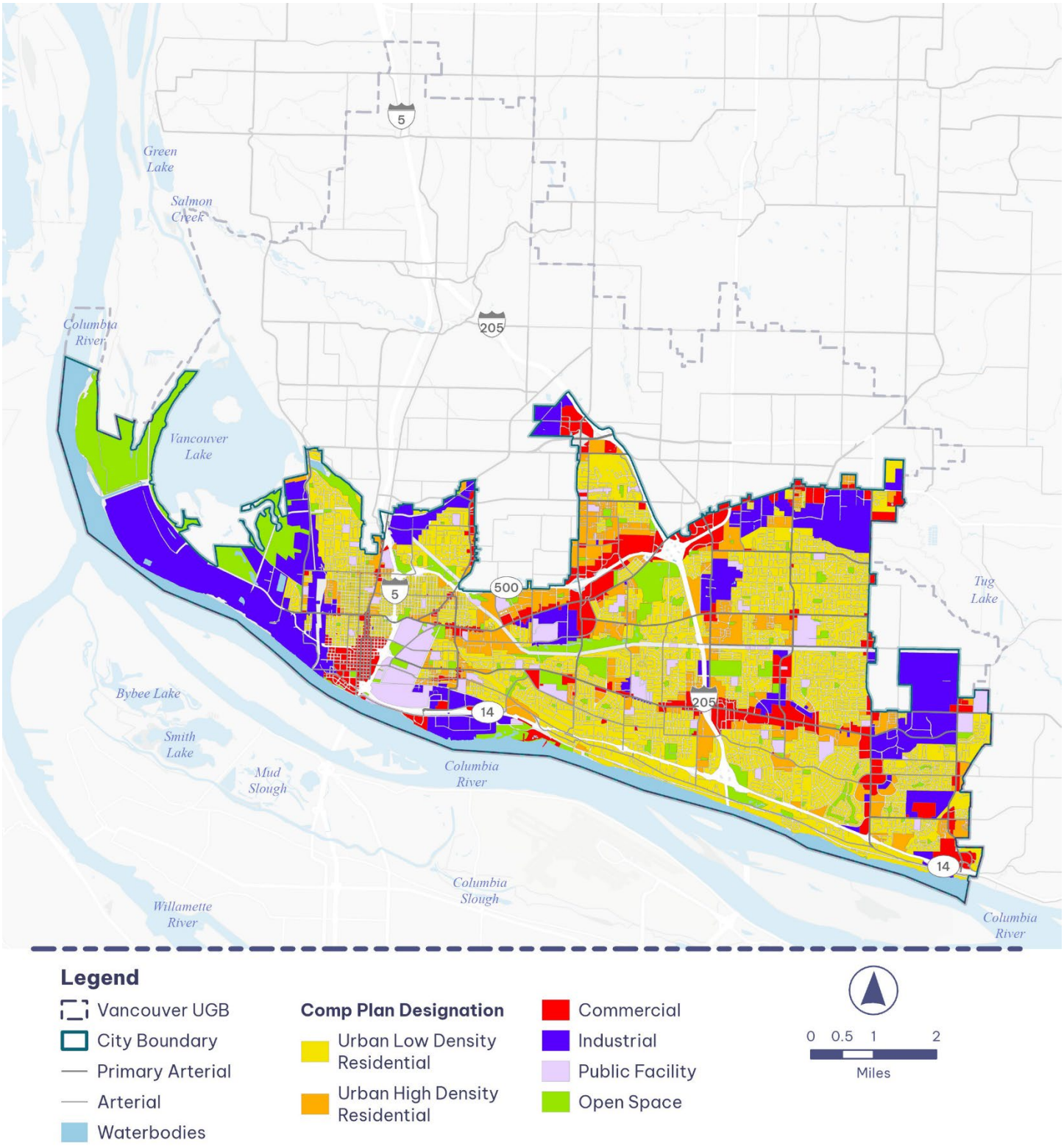
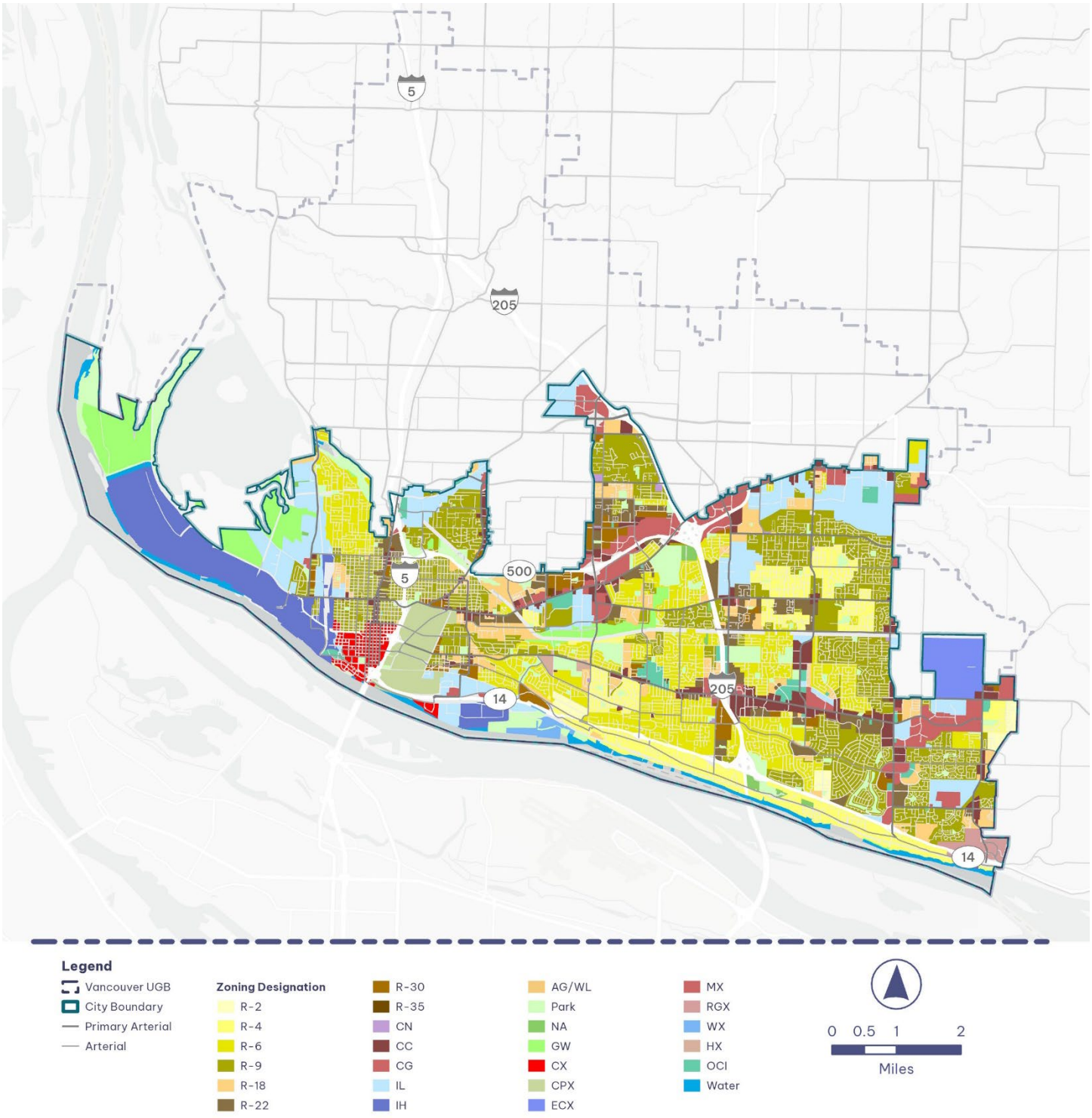


Figure 5. No Action Alternative Zoning Map



The No Action Alternative would have capacity for approximately 29,600 new housing units and 16,600 new jobs citywide by 2045. The No Action Alternative would not meet the GMA requirement to accommodate new 20-year growth forecasts, or the City's specific 2045 targets of at least 38,129 new housing units and 43,198 new jobs. Refer to Appendix B for the methods and assumptions for forecasting future housing and jobs capacity.

Action Alternatives

~~Both~~ All action alternatives assume that future growth and development would occur in line with the proposed Comprehensive Plan Update and the associated revised zoning code and development regulations. The action alternatives assume implementation of all applicable new state laws that affect comprehensive planning and development processes, including H.B. 1110, H.B. 1220, and H.B. 1337, as described in the No Action Alternative section.

Under ~~both~~ all action alternatives, the Comprehensive Plan land use designations and associated zoning code would be updated, renamed, and simplified to a smaller set of zoning districts, as discussed in Chapter 1: Summary and described in Table 2. The Preferred Alternative would include an additional residential zoning district for manufactured homes that was not yet developed for Alternatives 1 and 2 in the Draft EIS.

The locations and sizes of the proposed zoning districts would differ ~~between~~ among the ~~two~~ three action alternatives, as would the distribution of new housing units and jobs. ~~Both~~ All action alternatives are forecasted to exceed the City's minimum 2045 targets of at least 38,129 new housing units and 43,198 new jobs.

The following subsections summarize the major features of Alternative 1, ~~and~~ Alternative 2, and the Preferred Alternative by area of the ~~e~~City (west, central, and east).

Table 2. Proposed New Comprehensive Plan Designations/Zoning Districts and Allowances and Corresponding Current Comprehensive Plan/Zoning Designations

Proposed New Comprehensive Plan Designation (~~/~~Zoning District) for Action Alternatives	Proposed New Zoning Code Allowances	Corresponding Current and No Action Comprehensive Plan/Zoning Designation
Residential Neighborhoods (Low-Scale Neighborhood)	• Up to six housing units per parcel (per state law). • Minimum density of eight units/acre, no maximum density. • Building heights up to ~~three stories (maximum of~~ 45 feet tall~~)~~.	**Residential Urban Lower Density** R-2, R-4, R-6, R-9, R-17

Proposed New Comprehensive Plan Designation (~~/~~Zoning District) for Action Alternatives	Proposed New Zoning Code Allowances	Corresponding Current and No Action Comprehensive Plan/Zoning Designation
	• Typical housing types: Single-family homes, townhomes ~~townhouses~~, rowhomes ~~rowhouses~~, accessory dwellings ~~buildings~~, duplexes, quadplexes, and sixplexes. • Small-scale commercial activities like cafés, salons, professional services and restaurants mostly serving the surrounding neighborhood.	
Residential Neighborhoods (Medium-Scale Neighborhood)	• Minimum density of 16 units per acre, no maximum density. • Building heights up to ~~five stories (maximum of~~ 75 feet tall~~)~~. • Low-Scale Neighborhood housing types plus additional multifamily housing types. • Civic/institutional buildings and commercial activities like cafés, restaurants, small offices, and other retail goods.	**Residential Urban Higher Density** R-18, R-22, R-30, R-35, R-50
Residential Neighborhoods (Manufactured Home)[a]	• Applied to existing manufactured home parks to retain long-term affordability and prevent displacement of existing residents. • No other uses allowed unless ongoing use as manufactured home parks is demonstrably unfeasible.	**Residential Urban Lower Density** R-2, R-4, R-6, R-9, R-17, R-18
Urban Mixed Use (Mixed Use Neighborhood)	• Allows a broad range of housing, civic/institutional, commercial use types. • Minimum density of 32 units/acre, no maximum density. • Building heights ~~of 3 to 8 stories (maximum of~~ up to 110 feet tall~~)~~. • Typical housing types: Multifamily and mixed-use buildings at a variety of scales.	**Commercial and Mixed Use** CC (Community Commercial) CN (Neighborhood Commercial) CG (General Commercial)

Proposed New Comprehensive Plan Designation (~~/~~Zoning District) for Action Alternatives	Proposed New Zoning Code Allowances	Corresponding Current and No Action Comprehensive Plan/Zoning Designation
	• May include multiple neighborhoods connected to an activity center by a network of pathways or walkable streets. • Commercial or retail uses may include professional offices, medical providers, cafés, restaurants, small grocery stores, markets, and other retail goods.	OCI (Office-Campus-Industrial)
Urban Mixed Use (Regional Activity Center)	• Includes lands with opportunities for economic, entertainment, civic, and housing needs. • Minimum density of 64 units per acre, no maximum density. • No ~~M~~minimum or maximum building heights ~~of three stories, no maximum height~~. • Typical housing types: mixed-use residential, ~~apartment~~ multifamily, and mid-rise~~, and podium~~ buildings. • Size and makeup would vary based on location but would typically consist of compact, mixed-use development that maximizes residential, commercial, and open space opportunities.	**Commercial and Mixed Use** CX (City Center intensity) ECX (Employment Center Mixed Use) HX (Heights District) MX (Mixed Use) RGX (River Gateway) WX (Waterfront Mixed Use)
Employment ~~Mixed Use~~& Industry (Institutional/Campus)	• Includes lands that support academic, civic, or medical buildings. • No minimum or maximum b~~B~~uilding heights ~~of up to 12 stories (maximum of 150 feet tall).~~ • Allowable housing types: townhouses, ~~apartments~~ multifamily, mixed-use residential, and mid-rise buildings. • Buildings for athletic facilities, event spaces, equipment or other accessory uses needed to support an educational,	**Commercial and Mixed Use** CPX (Central Park Mixed Use)

Proposed New Comprehensive Plan Designation (~~/~~Zoning District) for Action Alternatives	Proposed New Zoning Code Allowances	Corresponding Current and No Action Comprehensive Plan/Zoning Designation
	medical, or large institution would also be allowed.	
Employment ~~Mixed Use~~& Industry (Industrial/Employment)	• Includes lands typically with large-scale, single-tenant industrial, warehouse and flexible-use ~~space~~ buildings and smaller, multi-tenant industrial buildings. • Building heights of up to ~~12 stories (maximum of~~ 150 feet tall~~)~~. • Buildings would be grouped to support and serve one another and to provide opportunities for employment clusters. • New housing not allowed.	Industrial OCI (Office-Campus-Industrial) IL (Light Industrial)
Heavy Industrial (Heavy Industrial)	• Includes lands currently zoned for heavy industrial uses and would remain unchanged. • New housing not allowed.	Industrial HI (Heavy Industrial)
Parks/Open Space (Parks)	• Includes lands currently zoned as public community and neighborhood parks. • Civic and institutional buildings would be allowed with height limit of 45 feet. • Housing not allowed.	Parks/Open Space P (Parks)
Parks/Open Space (Natural Areas)	• Includes lands currently zoned for greenways and natural areas, which are generally undeveloped lands managed for both natural and ecological value and light-impact recreational use. • Housing not allowed.	Parks/Open Space GW (Greenway) NA (Natural Area)

a The Manufactured Home zoning district was still in development at the time of the Draft EIS and is therefore only included in the Preferred Alternative analysis for this Final EIS.

Alternative 1

Alternative 1 would allow greater intensity and density of development in more areas of the ~~e~~City than the No Action Alternative but in fewer areas of the ~~e~~City than Alternative 2. Figure

6 shows the proposed Comprehensive Plan designations map, and Figure 7 shows the proposed zoning map for Alternative 1.

In West Vancouver (western city limits to west of I-5), large areas of Heavy Industrial and Industrial/Employment lands would remain. The existing Commercial areas of downtown Vancouver would be designated as Regional Activity Center, allowing for continued development of housing, office, civic, and entertainment uses. Existing commercial and residential corridors along Main Street would be designated as Mixed-Use Neighborhood. Existing lower-density residential areas just north of downtown Vancouver would be designated as the denser Medium-Scale Neighborhood. Lower-density residential areas north of Fourth Plain Boulevard would be similarly designated as Low-Scale Neighborhood.

In Central Vancouver (between I-5 and I-205), the lower-density residential neighborhoods south of East Mill Plain Boulevard would be similarly designated as Low-Scale Neighborhood. There would be greater areas of denser Mixed-Use and Medium-Scale Neighborhoods along the East Mill Plain Boulevard and Northeast Fourth Plain Boulevard corridors compared to the No Action Alternative. The Vancouver Mall and adjacent areas along Northeast Fourth Plain Boulevard would be rezoned from Commercial to Industrial/Employment and Regional Activity Center, allowing for some potential job growth and denser housing development. Most of the area north of the Vancouver Mall would be designated as Medium-Scale Neighborhood, allowing for denser housing types than under the No Action Alternative.

In East Vancouver (from I-205 east to the eastern city limits), there would be expanded areas of Mixed-Use Neighborhood along Mill Plain Boulevard, 164th Avenue, and 192nd Avenue, which would allow for more housing compared to the Industrial and Commercial designations under the No Action Alternative. The vacant Section 30 site at the far east end of the ~~e~~City would be designated as Mixed-Use Neighborhood, bordered by Regional Activity Center, a change from the largely Industrial designation under the No Action Alternative.

These changes in land use designations would result in a higher capacity for new housing units and jobs than the No Action Alternative but a lower capacity than Alternative 2. Based on market feasibility and redevelopment potential, Alternative 1 would have capacity for approximately 45,100 new housing units and 46,000 new jobs citywide, which exceeds the City's minimum 2045 planning targets. Refer to Appendix B for the methods and assumptions for forecasting future housing and jobs capacity.

Figure 6. Alternative 1 Proposed Comprehensive Plan Designations Map

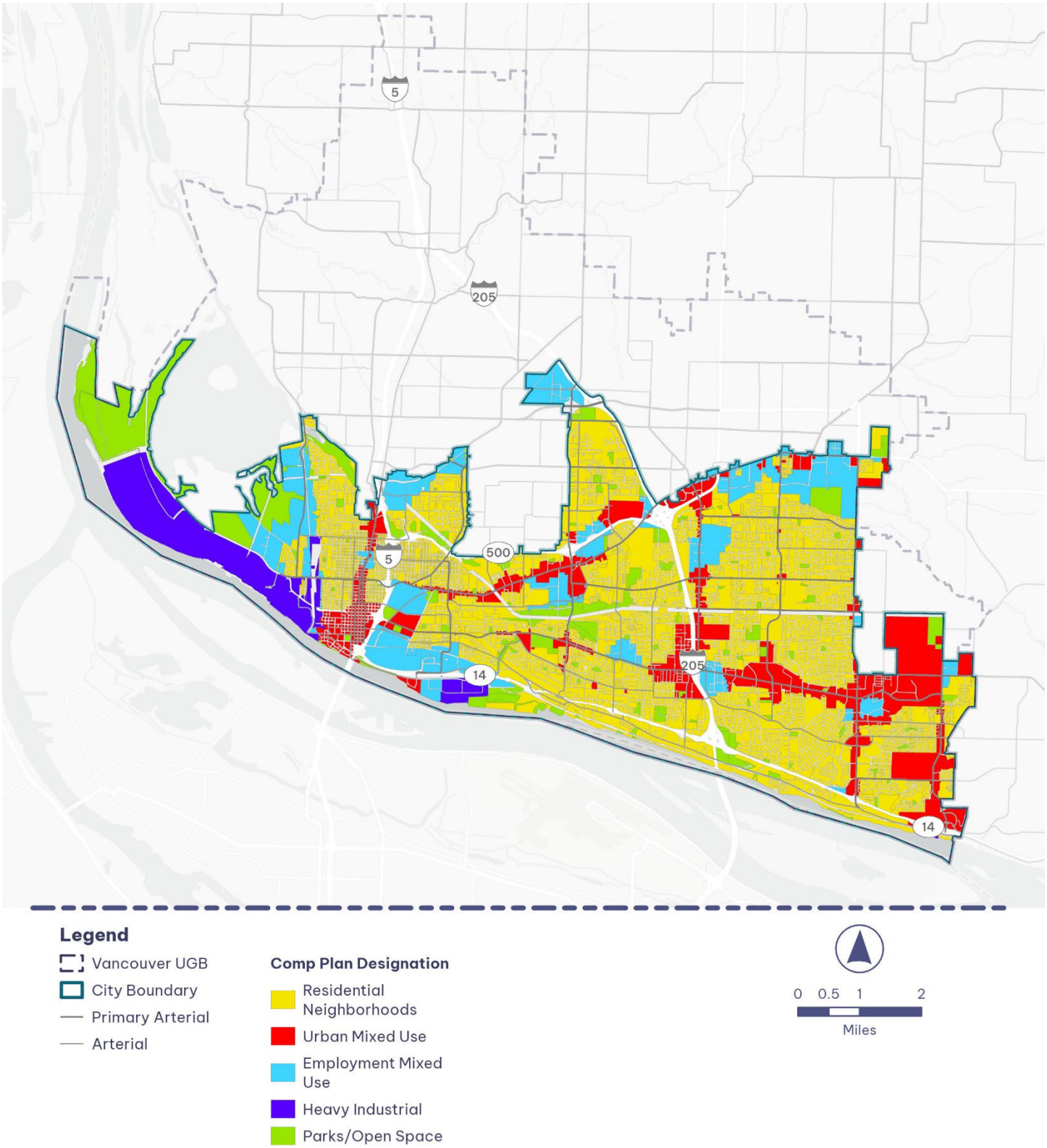
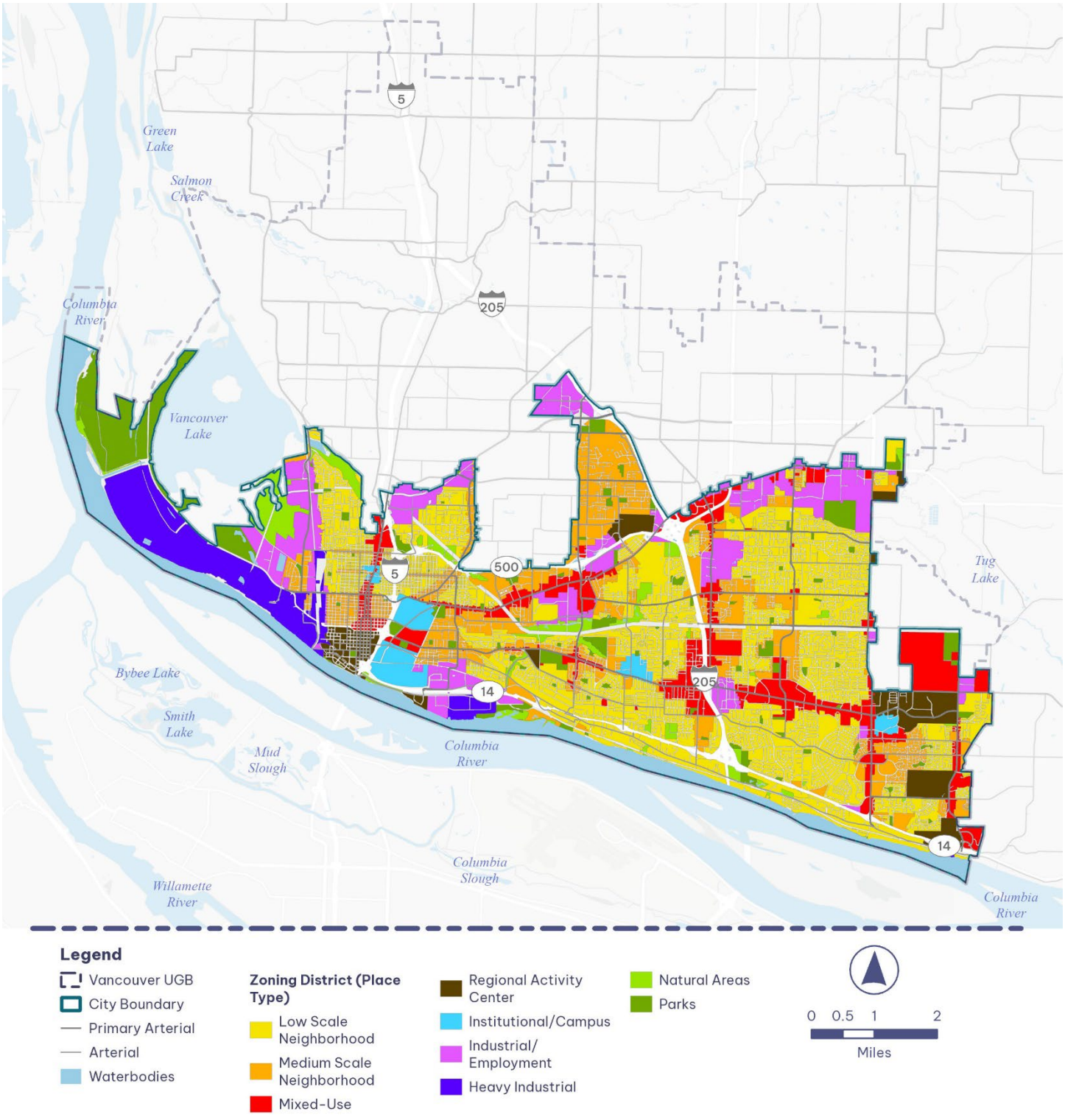


Figure 7. Alternative 1 Proposed Zoning Districts Map



Alternative 2

Alternative 2 would allow the greatest intensity and density of development in more areas of the city. Figure 8 shows the proposed Comprehensive Plan designations map, and Figure 9 shows the proposed zoning map for Alternative 2.

In West Vancouver, the same Heavy Industrial and Industrial/Employment lands would remain as in Alternative 1. Downtown commercial areas would be designated as Regional Activity Center, and would extend farther north on Main Street than Alternative 1. Existing commercial and residential lands north of Fourth Plain Boulevard along Main Street would be designated as Mixed-Use Neighborhood. Compared to Alternative 1, more existing residential areas just north of downtown Vancouver would be designated as Medium-Scale Neighborhood. Lower-density residential areas of Northwest Vancouver would be similarly designated as Low-Scale Neighborhood.

In Central Vancouver, similar to Alternative 1, the existing lower-density residential neighborhoods south of East Mill Plain Boulevard would be designated as Low-Scale Neighborhood. Alternative 2 would have larger areas of Mixed-Use Neighborhood, Medium-Scale Neighborhood, and Regional Activity Center zoning districts along the East Mill Plain Boulevard and Northeast Fourth Plain Boulevard corridors than Alternative 1. Similar to Alternative 1, the Vancouver Mall and adjacent areas along Northeast Fourth Plain Boulevard would be designated as Regional Activity Center, allowing for greater potential job growth and new denser housing. Larger areas north and west of the Vancouver Mall would be designated as Mixed-Use Neighborhood or Medium-Scale Neighborhood than under Alternative 1, allowing for greater potential housing density.

In East Vancouver, Alternative 2 would have larger areas of Mixed-Use Neighborhood and Regional Activity Center zoning districts along major corridors such as Mill Plain Boulevard, 164th Avenue, and 192nd Avenue compared to Alternative 1. Alternative 2 would also include larger areas of Medium-Scale Neighborhood in the neighborhoods adjacent to these corridors and smaller areas of Low-Scale Neighborhood. More land at and near the Section 30 site would be designated as a Regional Activity Center than in Alternative 1.

Alternative 2 would have the highest capacity for new housing units and jobs. Based on market feasibility and redevelopment potential, Alternative 2 would have capacity for approximately 50,700 new housing units and 49,300 new jobs citywide, which exceeds the minimum City's 2045 targets. Refer to Appendix B for the methods and assumptions for forecasting future housing and jobs capacity.

Figure 8. Alternative 2 Proposed Comprehensive Plan Designations Map

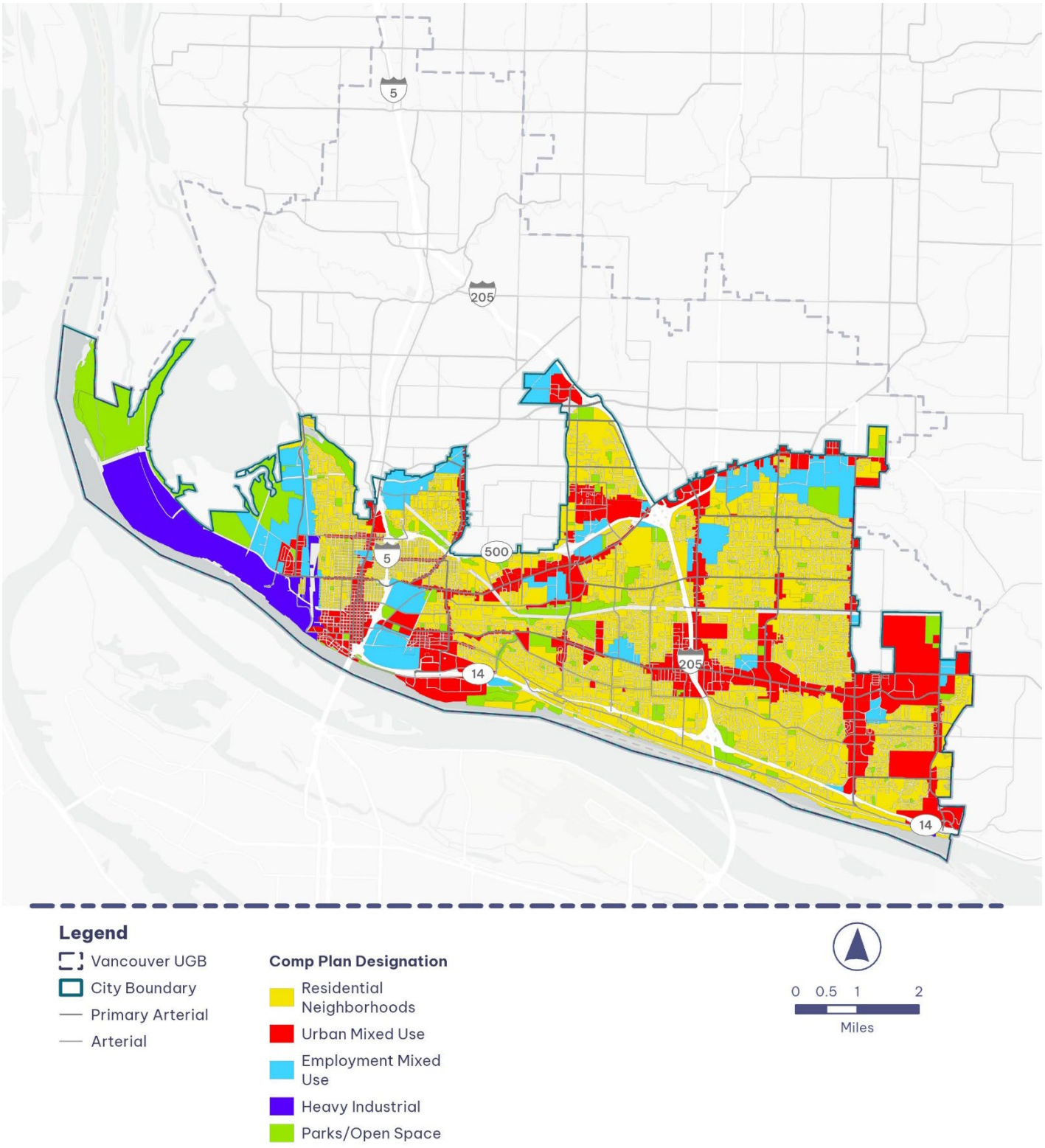
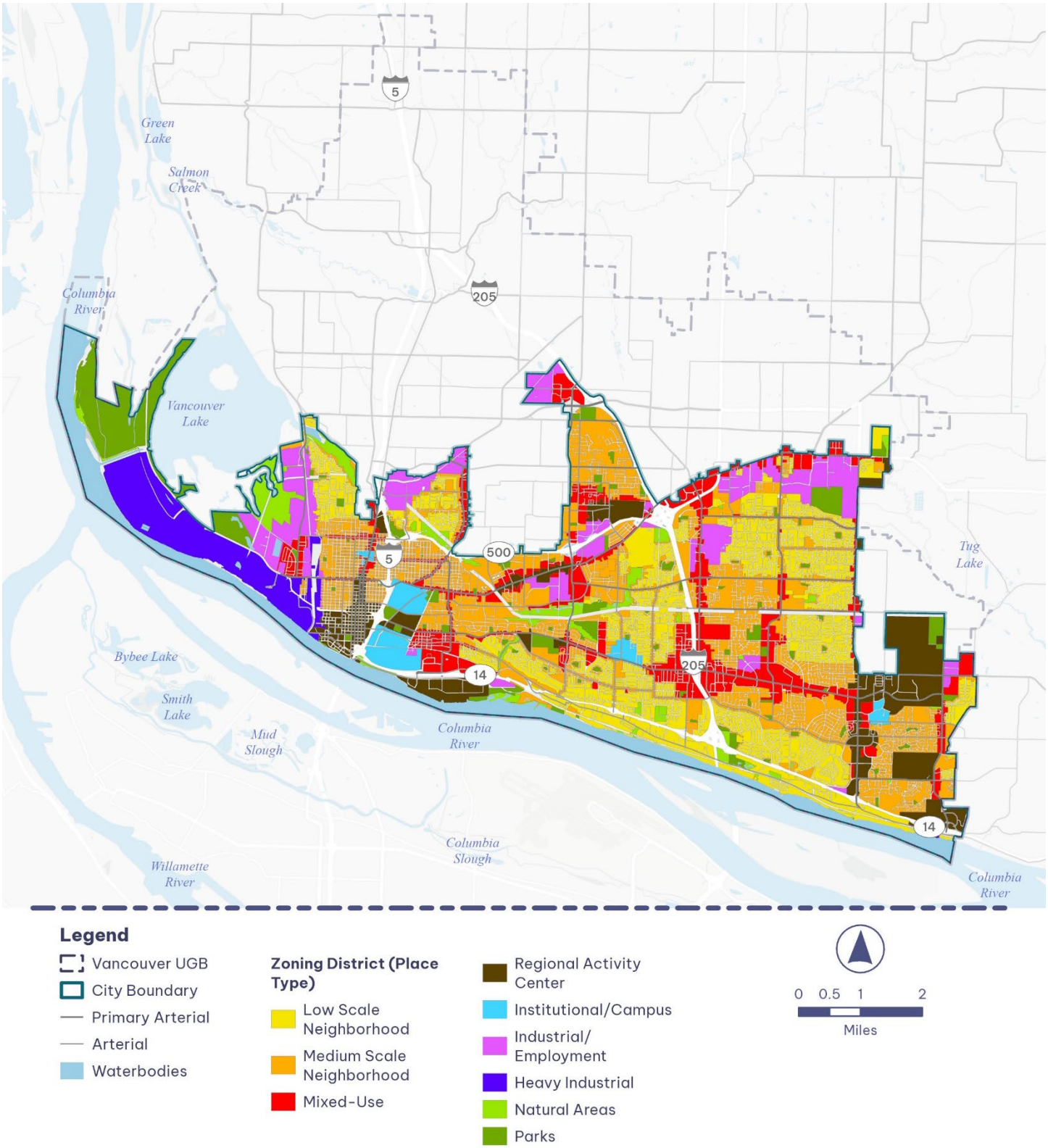


Figure 9. Alternative 2 Proposed Zoning Districts Map



Preferred Alternative

The Preferred Alternative would allow a greater intensity and density of development in more areas of the City than the No Action Alternative and a similar mix of land uses and zoning districts compared to Alternatives 1 and 2.

Figure 10 shows the proposed Comprehensive Plan designations map, and Figure 11 shows the proposed zoning map for the Preferred Alternative. The color scheme and format of these maps differ slightly from previous alternatives presented in the Draft EIS for consistency with the proposed Comprehensive Plan Update.

In West Vancouver, large areas of Heavy Industrial and Industrial/Employment lands would remain. Similar to Alternative 2, the existing Commercial areas of downtown Vancouver would be designated as Regional Activity Center, allowing for continued development of housing, office, civic, and entertainment uses. Similar to Alternative 2, existing commercial and residential corridors along Main Street would be designated as Mixed Use Neighborhood and Regional Activity Center. Existing lower-density residential areas just north of downtown Vancouver would be designated as the denser Medium-Scale Neighborhood. This area of Medium-Scale Neighborhood would extend farther north compared to Alternatives 1 and 2. The northernmost lower-density residential areas would be designated as Low-Scale Neighborhood.

In Central Vancouver, the lower-density residential neighborhoods south of East Mill Plain Boulevard would be designated as Low-Scale and Medium-Scale Neighborhood, with more area designated for Medium-Scale Neighborhood compared to Alternatives 1 and 2. Along East Mill Plain west of the Heights area, the corridor would be designated as Medium-Scale Neighborhood, whereas in Alternatives 1 and 2 it would be designated as Mixed Use Neighborhood. Similar to Alternative 2, there would be greater areas of denser Mixed-Use and Medium-Scale Neighborhoods along the East Mill Plain Boulevard and Northeast Fourth Plain Boulevard corridors, as compared to Alternative 1. The Vancouver Mall and adjacent areas along Northeast Fourth Plain Boulevard would be rezoned from Commercial to Regional Activity Center and Mixed-Use, allowing for some potential job growth and denser housing development. The Preferred Alternative would be different from Alternatives 1 and 2 by designating the Vancouver Plaza area as Mixed Use, rather than Industrial/Employment. Most of the area north of the Vancouver Mall would be designated as Medium-Scale Neighborhood, allowing for denser housing types similar to Alternative 1.

In East Vancouver, there would be expanded areas of Mixed-Use Neighborhood and Regional Activity Center along Mill Plain Boulevard, 164th Avenue, and 192nd Avenue, similar to Alternative 2. The mostly vacant Section 30 site at the far east end of the City would be designated as Institutional/Campus, bordered by Mixed Use Neighborhood and

Industrial/Employment, a change from the largely Industrial designation under the No Action Alternative, Mixed-Use under Alternative 1, and Regional Activity Center under Alternative 2.

These changes in land use designations would result in a higher capacity for new housing units and jobs than the No Action Alternative but a lower capacity than Alternatives 1 and 2. New housing capacity would be spread more evenly throughout all areas of the city, compared to Alternatives 1 and 2, which focused a substantial portion of the potential for new housing capacity in East Vancouver. Based on market feasibility and redevelopment potential, the Preferred Alternative would have capacity for approximately 44,100 new housing units and 45,100 new jobs citywide, which exceeds the City's minimum 2045 planning targets. Refer to Appendix B for the methods and assumptions for forecasting future housing and jobs capacity.

Figure 10. Preferred Alternative Proposed Comprehensive Plan Designations Map

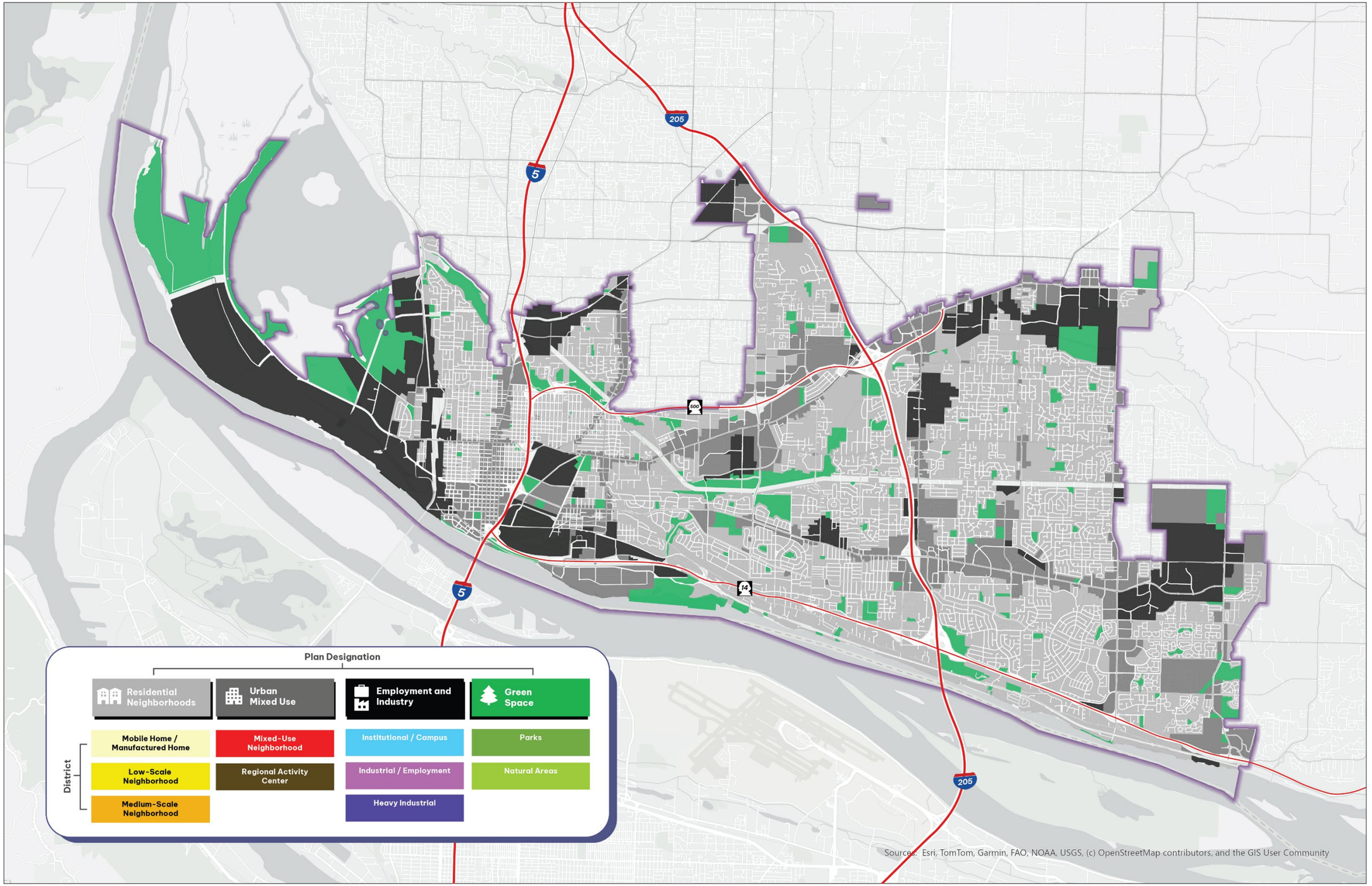
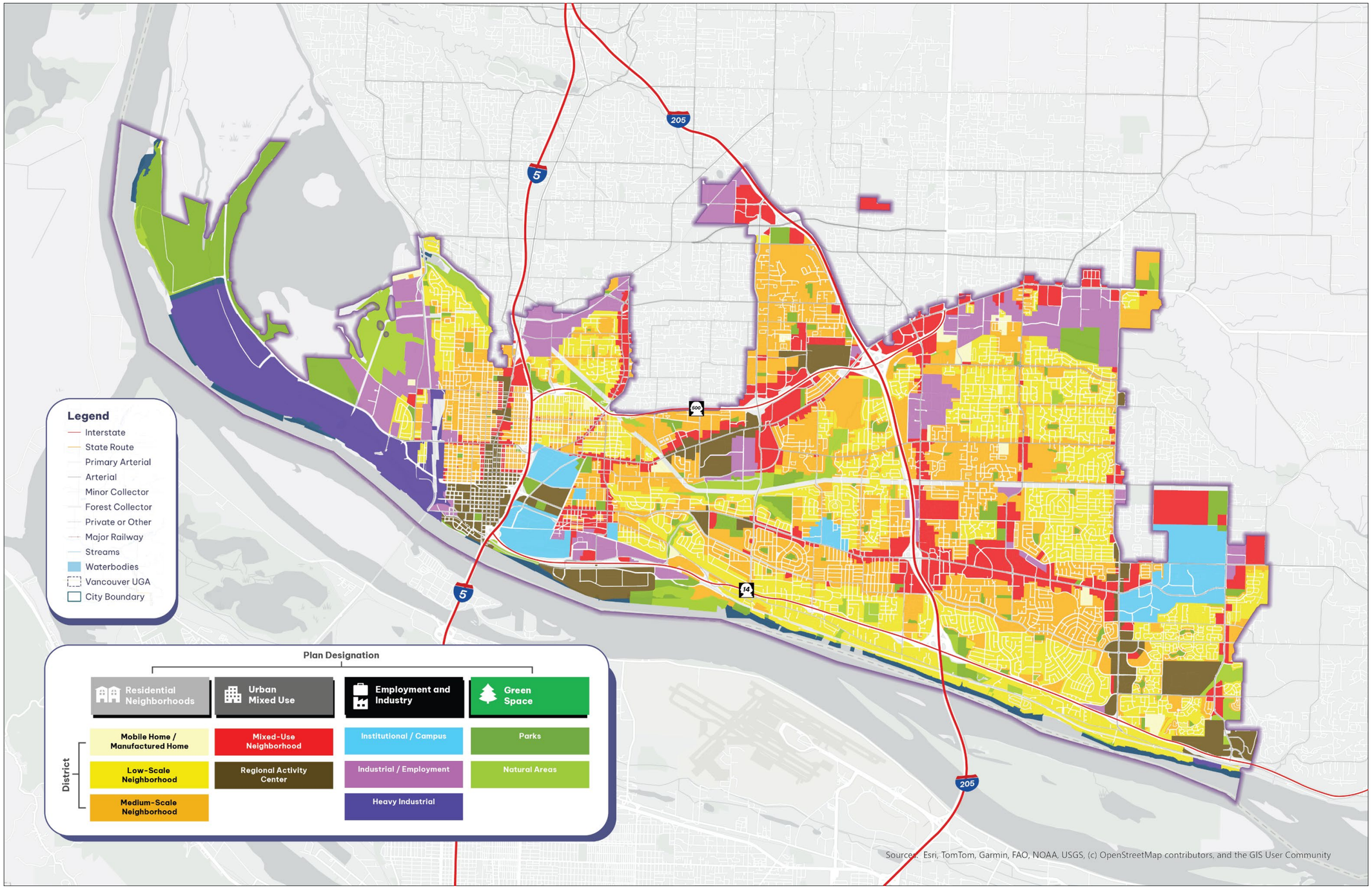


Figure 11. Preferred Alternative Proposed Zoning Districts Map



Comparison of Alternatives

Of all the alternatives, Alternative 2 would allow the greatest density, intensity, and mix of land uses in the most areas of the city, and the No Action Alternative would allow the least. Alternative 1 would allow greater density, intensity, and mix of land uses in more areas of the ~~e~~City than the No Action Alternative but generally less than Alternative 2. The Preferred Alternative would allow greater density and intensity in more areas of the City than the No Action Alternative and would have a similar mix of land uses to Alternative 2.

Table 3 summarizes the differences in the amount of land acreage devoted to the different zoning districts proposed in the Comprehensive Plan Update.

The overall split of zoning districts by land acreage would be similar among the action alternatives. Under all alternatives, predominantly residential Low-Scale and Medium-Scale Neighborhood zoning districts would make up about half of the city's total land area. For Alternative 2 and the Preferred Alternative, the amount of land within those zoning districts would be split more equally between Medium-Scale Neighborhood and Low-Scale Neighborhood. The Preferred Alternative includes a new zoning district, Manufactured Home, that would preserve a small amount of land with existing manufactured home park developments as specifically designated for that use.

The total acreage of the Institutional/Campus zoning district (and equivalent land uses under the No Action Alternative; refer to Table 2) would be greatest under the Preferred Alternative and would be similar under ~~all~~the No Action and A~~a~~lternatives 1 and 2. There would be no meaningful difference among the alternatives in the total land area zoned as Parks and Natural Areas.

There would be slightly less Heavy Industrial and Industrial/Employment land area (and equivalent land uses under the No Action Alternative; refer to Table 2) under Alternative 2 and the Preferred Alternative than the No Action Alternative and Alternative 1. Alternative 2 would have the most land designated as Regional Activity Center and Mixed Use and would include the greatest capacity for future job growth compared to the other alternatives.

The biggest differences in zoning districts, as measured by land area, would be:

- Almost 50% more land area designated as Low-Scale Neighborhood under Alternative 1 compared to Alternative 2 and the Preferred Alternative.
- Almost 50% more land area designated as Medium-Scale Neighborhood under Alternative 2 and the Preferred Alternative compared to Alternative 1.

- More than double the land area designated as a Regional Activity Center under Alternative 2 compared to Alternative 1 and about 40% more compared to the Preferred Alternative.
- Nearly double the land area designated as Institutional/Campus under the Preferred Alternative compared to Alternatives 1 and 2 and the No Action Alternative.

Table 3. Comparison of Acreage of Zoning Districts by Alternative

Zoning District	No Action Acreage (Percentage of Total Land Area)[a]	Alternative 1 Acreage (Percentage of Total Land Area)	Alternative 2 Acreage (Percentage of Total Land Area)	Preferred Alternative (Percentage of Total Land Area)
Heavy Industrial	~~1,688~~ 1,771 (7%)	~~1,688~~ 1,771 (7%)	~~1,535~~ 1,610 (~~6~~ 7%)	1,609 (7%)
Industrial/Employment	~~2,788~~ 2,943 (~~11~~ 12%)	~~2, 724~~ 2,866 (~~11~~ 12%)	~~2,128~~ 2,263 (9%)	2,274 (9%)
Institutional/Campus	~~562~~ 566 (2%)	~~591~~ 600 (2%)	~~576~~ 589 (2%)	1,168 (5%)
Low-Scale Neighborhood	~~9,960~~ 10,149 (41%)	~~8,648~~ 8,759 (~~36~~ 35%)	~~5,346~~ 5,388 (22%)	5,830 (24%)
Medium-Scale Neighborhood	~~2,872~~ 2,911 (12%)	~~3,915~~ 4,003 (16%)	~~6,321~~ 6,469 (26%)	6,304 (25%)
Manufactured Home[b]	N/A	N/A	N/A	205 (1%)
Mixed Use	~~1,955~~ 1,970 (8%)	~~2,611~~ 2,636 (11%)	~~2,984~~ 3,015 (12%)	2,718 (11%)
Natural Areas[bc]	~~1,368~~ 1,340 (~~6~~ 5%)	~~993~~ 997 (4%)	~~993~~ 996 (4%)	1,064 (4%)
Parks[c]	~~1,544~~ 1,530 (6%)	1,990 (8%)	~~1,990~~ 1,992 (8%)	2,004 (8%)
Regional Activity Center	~~1,536~~ 1,555 (6%)	~~1,121~~ 1,122 (5%)	~~2,406~~ 2,426 (10%)	1,569 (6%)
Total[cd, e]	~~24,275~~ 24,734	~~24,279~~ 24,744	~~24,279~~ 24,744	24,746

Notes:

a Acreage for the No Action Alternative zoning districts is approximate and based on converting land acreages from their existing Comprehensive Plan and zoning designations to their most similar proposed zoning districts. For example, all parcels zoned currently as R-2, R-4, R-6, and R-9, referred to as "Urban Lower Density" areas in the current Comprehensive Plan, were classified as the proposed new Low-Scale Neighborhood zoning district. All parcels currently zoned CN (Neighborhood Commercial), CC (Community Commercial), and GC (General Commercial) were classified as the Mixed-Use zoning district. These reclassifications are only for the purposes of this comparison. No reclassification would occur under the No Action Alternative.

b The Manufactured Home zoning district was still in development at the time of the Draft EIS and is therefore only included in the Preferred Alternative analysis for this Final EIS.

~~b~~c Parks and natural areas acreage includes both public and non-public land for the No Action Alternative but only public land for the action alternatives. In the action alternatives, non-publicly owned or non-publicly accessible areas that were zoned as Parks/Open Space uses are assumed to match the underlying zoning based on their relative location to other zoning districts. Effectively, there is assumed to be no difference in parks/open space acreage among the No Action and Action Alternatives. The Comprehensive Plan Update and EIS identify parks/open space needs based on future growth projections, but the proposed Comprehensive Plan designations and zoning maps do not include additional Parks or Natural Areas zoning because future acquisitions are not known at this time. Park acreage will likely increase during the 20-year planning period as additional park land is acquired to serve growth.

~~c~~d Total citywide land acreage is assumed to be the same across all alternatives but may not match due to rounding and differences in how parks/natural areas are accounted for (refer to note ~~No. 2~~c). Acreage does not include land designated as roads, easements, or water.

e The methodology to calculate acreage of zoning districts changed slightly between the Draft EIS and Final EIS to be based on zones rather than parcels. The total acreage across the City is now more consistent between the No Action and action alternatives.

Table 4 summarizes the differences in estimated capacity for future jobs and housing under the alternatives.

Table 4. Comparison of 2045 Estimated Housing and Jobs Capacity by Alternative

Metric	City Target	No Action Alternative[a]	Alternative 1	Alternative 2	Preferred Alternative
Capacity for New Housing Units	38,129	29,600	45,100	50,700	44,100
Capacity for New Jobs	43,198	16,600	46,000	49,300	45,100

Note:

a As described in the text below this table, limitations on modeling for the No Action Alternative should be considered when comparing its estimated growth capacity with the estimated growth capacities of the action alternatives. Refer to Appendix B for the full methodology used.

Alternative 1, ~~and~~ Alternative 2 and the Preferred Alternative would ~~both~~ all exceed the minimum City targets for new housing units and jobs by 2045. Alternative 2 would have the highest capacity for each. The No Action Alternative would not meet GMA requirements or minimum City targets for new housing units and jobs. The differences in the estimated growth capacities between the No Action Alternative, ~~and~~ Alternatives 1 and 2, and the Preferred Alternative reflect practical limitations in how the capacity estimates are calculated, in addition to the fact that the No Action Alternative allows for less intensive future growth, particularly outside of single-family zones.

The No Action Alternative capacity forecast is based on the Clark County Vacant Buildable Lands Model (VBLM) and existing redevelopment assumptions built into the model. The VBLM does not fully account for the feasibility of redevelopment, particularly as it relates to redevelopment to support job growth. The No Action Alternative uses the VBLM because it

would retain existing zoning classifications and their allowed densities and uses, and therefore, the assumptions related to employment density and redevelopment rate used in the action alternatives do not apply to the No Action Alternative. This results in a different capacity analysis methodology for the No Action Alternative compared to the action alternatives.

The housing and jobs capacity forecasts for Alternatives 1 and 2 and the Preferred Alternative consider market and ~~re~~development feasibility while accounting for limitations on redevelopment, including ~~and other limiting factors, such as~~ the presence of critical areas or required infrastructure. ~~, that would influence new development. They are intended to~~ The forecasts provide an analysis of feasible developments based on current market factors; therefore, the capacity numbers are lower than the maximum build-out that would be allowed by the new zoning designations in each alternative. ~~the basis for analyzing the impacts of a feasible level of potential build-out under each of the alternatives in the Draft EIS. These capacity forecasts are therefore lower than the maximum build-out that would be allowed outright by the zoning designations for each alternative.~~ During the review of Alternatives 1 and 2, additional considerations were added to the methodology for the Preferred Alternative to account for the presence of master plan and development agreements, presence of private covenants limiting development, and zoning allowances, which further limited development feasibility. Refer to Appendix B for the methods and assumptions used for forecasting future estimated housing and jobs capacity.

Under all alternatives, the actual timing and distribution of future growth would be influenced by future market conditions, decisions made by individual property owners and developers, and other factors.

Chapter 3: Built Environment

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. New content in this chapter is generally denoted with underlined text, while changes to information are denoted with strikethrough text. Updates focus on adding the new analysis of the Preferred Alternative, as well as minor corrections and clarifications to the analysis presented in the Draft EIS. Some changes are denoted with footnotes and table notes when further explanation was warranted.

This chapter describes the methodologies, existing conditions (affected environment), and potential impacts of the alternatives for the following environmental topic areas related to the built environment: land and shoreline use, housing, aesthetics, historic and cultural preservation, transportation, and public services and utilities.

For each topic, the chapter provides a summary of impacts common to all alternatives, impacts unique to each alternative, and a summary of potential avoidance, minimization, and mitigation measures to address potential impacts and identifies impacts that are considered to be significant and unavoidable under SEPA.

Land and Shoreline Use

Methodology

Analysts reviewed relevant information and policies about existing land and shoreline use and current data on citywide population and employment, including the following sources:

- **Washington State Growth Management Act (GMA)** – Passed in 1990 to require urbanizing jurisdictions to adopt comprehensive plans and to establish statewide thresholds and guides for growth. The intent of the GMA is to direct growth for sustainable development with sufficient public infrastructure and facilities to support such growth while also protecting resourcing lands. Additionally, since the establishment of the GMA, updated state level policies have been focused on promoting healthy, walkable communities; preserving natural resources; providing affordable housing opportunities; and planning for climate change and its impacts.
- **Clark County Countywide Planning Policies** – Used to establish a countywide framework for growth management, coordinate the comprehensive plans of all jurisdictions within Clark County for regional issues or issues affecting common borders, and develop and adopt county and city comprehensive plans.

- **Vancouver Comprehensive Plan 2011-2030** (City of Vancouver 2021a) – This plan envisioned the ~~e~~City for the next 20 years (through 2030) for community and economic development, housing, environment, public facilities and services, and annexation. It also provided strategies for the plan's implementation and established land use designations across the city, which are consistent with complimentary land use zones regulated by VMC Title 20. The 2011 Comprehensive Plan is the basis for the Our Vancouver Comprehensive Plan Update.
- **VMC Title 20, Land Use and Development Code** - Contains the City's zoning and development regulations, which are required to be updated and consistent with its Comprehensive Plan per GMA mandates.
- **City of Vancouver Shoreline Master Program** (City of Vancouver 2021b) – Envisions the development along the Vancouver shoreline, including how to promote public health, safety, and community welfare while ensuring no net loss of shoreline ecological functions. The SMP defines shoreline development and management practices that are in accordance with state practices and codes and provides specific guidelines regarding general requirements, exemptions and uses. The goal of the SMP is to allow for mutually compatible uses between shoreline preservation and land use development.
- **U.S. Census Bureau American Community Survey** (Census 2023a)- Provides a variety of demographic information on a yearly basis at the national, state, regional, and city levels. This EIS uses primarily ACS 2019-2023 five-year and 2023 one-year data as the basis for analysis for consistency with other recent studies completed for the Comprehensive Plan Update. 2023 is the baseline year of analysis for the Comprehensive Plan Update.
- OUR VANCOUVER **Community Atlas** (Design Workshop 2024) – Documents existing ~~e~~City conditions for a variety of topics including people; natural environment; cultural resources; built environment; economy; parks, recreation, open spaces, and trails; and a regulatory framework assessment to support the City's update of the Comprehensive Plan and VMC Title 20 per GMA requirements. The analysis is referenced in this EIS and will also be used to inform the Comprehensive Plan development.
- OUR VANCOUVER **Economic Conditions and Opportunities Analysis** (ECONorthwest 2024a) – Prepared to support the Comprehensive Plan Update and outlines the basis for the City's 2045 target of 43,198 jobs. The analysis includes findings related to economic conditions and competitiveness, including measures of employment, growth and productivity, business creation and retention, entrepreneurship, investment flows, access to capital, distribution of wealth and income, and racial and geographic inclusion. Key information from the memorandum is referenced in this EIS and will also be included in the Economic Opportunity Element of the Comprehensive Plan to inform the City's economic development through 2045.

- OUR VANCOUVER **Housing Needs Assessment** (ECONorthwest 2024b) – Establishes the City's 2045 target of 38,129 housing units through evaluation of current housing stock and supply, existing conditions and housing needs across the income spectrum, and the current and projected future demand for housing. The insights from this analysis are referenced in this EIS and will build a factual basis for updating the Housing Element of the Comprehensive Plan and its supporting policies through 2045.
- OUR VANCOUVER **Equity Analysis** (Seva Workshop 2024) - Includes context and conditions analysis that helps to identify which communities within the ~~e~~City have been historically marginalized and which communities are most vulnerable to displacement and policy changes. The City is committed to prioritizing these identified communities in the Comprehensive Plan Update process to help address past inequities.
- OUR VANCOUVER **Draft Health Impact Assessment** (BERK 2025) - Considers how the growth alternatives studied as part of the OUR VANCOUVER Comprehensive Plan periodic update may benefit and impact health in Vancouver as it relates to the built environment.

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Compatibility with land and shoreline use plans and policies
- Ability to accommodate adopted citywide minimum growth targets
- Compatibility with existing land uses
- Average wage of new jobs based on land use mix
- Level of commercial displacement risk

Affected Environment

Current Land Use

This section discusses the City's existing Comprehensive Plan land use designations and zoning, land cover, land uses, centers and corridors, commercial uses, industrial uses, and essential services. Refer to the Housing section of Chapter 3 for more information about current residential land uses.

Comprehensive Plan Land Use Designations and Zoning

The current Vancouver Comprehensive Plan establishes general patterns for future land use, transportation and other infrastructure needs. Subarea plans provide more detailed geographically based plans for neighborhoods, corridors, Urban Reserve areas, special districts and joint planning areas.

Citywide development is guided and allocated by zoning, codified in VMC Title 20, Land Use and Development Code. The City designates various use types within each zoning category, which include residential, commercial, and industrial zone districts in addition to specialized zone districts for mixed uses and parks and open spaces.

Table 5 provides the existing Comprehensive Plan designations, their respective descriptions, and corresponding zoning districts. Zoning establishment and requirements and development standards are regulated in VMC Chapter 20.410 as summarized in Appendix C, Land Use and Zoning Information. Figure 4 in Chapter 2 shows a map of the No Action Alternative Comprehensive Plan designations, and Figure 5 in Chapter 2 shows a map of the No Action Alternative zoning designations, which would be the same as current Comprehensive Plan and zoning designations.

Table 5. Current Comprehensive Plan Designations and Corresponding Zoning Districts

Current Comprehensive Plan Designation	Description	Corresponding Zoning Districts/Zones	Allowed Uses
Residential Urban Lower Density	Predominantly lower density residential development with some allowances for middle housing types.[a]	R-2 R-4 R-6 R-9 R-17	Single-family detached residential, duplexes, townhouse, and single-family homes on small lots using infill standards.
Residential Urban Higher Density	Predominantly higher-density residential uses.	R-18 R-22 R-30 R-35 R-50 Mixed Use (MX)	Apartments, condominiums, duplexes, townhouses, small-lot single-family homes, and mixed uses.

Current Comprehensive Plan Designation	Description	Corresponding Zoning Districts/Zones	Allowed Uses
Commercial and Mixed Use	Predominantly small to medium-scale mixed-use and/or commercial uses and services scaled to serve a neighborhood to citywide need. This designation includes specific, planned mixed-use areas within the city.	Neighborhood Commercial (CN) Community Commercial (CC) General Commercial (CG) City Center (CX) Waterfront Mixed Use (WX) Vancouver Central Park (CPX) Riverview Gateway (RGX)[b] MX The Heights (HX)	General retail, entertainment oriented, motor vehicle related uses, some office related uses, parks open space related uses, and some low intensity industrial uses.
Industrial	Predominantly industrial related uses, including airports.	Office Commercial Industrial (OCI) Employment Center Mixed-Use (ECX) Light Industrial (IL) Heavy Industrial (IH) Airport (A)	Basic utilities, some general retail, motor vehicle related uses, office related uses, light and heavy industrial uses, agricultural uses, airport and accessory uses, and parks and open space.
Open Space	Areas intended for parks, greenways, and natural areas.	Greenway (GW) Natural Area (NA) Park (P)	Some agricultural related uses, environmental management and education, and park and recreation facilities.

Current Comprehensive Plan Designation	Description	Corresponding Zoning Districts/Zones	Allowed Uses
Public Facility	Areas developed with or planned for public facilities.	All Zones	Schools, police departments, fire departments, and hospitals.

Source: City of Vancouver 2021a

Notes:
a Middle housing refers to duplexes, townhouses, quadplexes, and sixplexes.
b RGX zone is also consistent with Low-Density Residential, High Density Residential, and Industrial Comprehensive Plan designations.

Existing Land Uses

Vancouver has three loosely defined geographies with differing land uses: west (areas west of I-5), central (areas between I-5 and I-205) and east (areas east of I-205). These geographies within the ~~e~~City developed over time, generally west to east, and are reflective of different settlement patterns, regulations, and periods of growth (City of Vancouver 2023a).

West Vancouver, including the downtown area, generally has smaller lots with denser uses such as office, retail, apartments, and vertical mixed-use. Farther west of downtown toward the Columbia River and Vancouver Lake, there are more intensive, industrial land uses such as manufacturing, gasoline storage facilities, and the Port of Vancouver. North of downtown, there are areas of traditional single-family detached housing on the historic City grid.

Central Vancouver has a more suburban character than the western areas, including postwar subdivisions and older big-box retail developments. The central portions of the ~~e~~City include the Fort Vancouver National Historic Site and Pearson Field, the City's municipal airport, as well as PeaceHealth Southwest Medical Center and surrounding medical office buildings, and the Vancouver Mall and surrounding commercial development.

Eastern areas of the City are the most suburban in land use patterns, with newer, largely detached single-family residential uses, big-box retail developments, and more recent office and mixed-use developments, such as the Columbia Tech Center and Vancouver Innovation Center.

Centers and Corridors

The current Comprehensive Plan identifies the need to focus new growth in areas in or near urban centers and corridors rather than spreading growth uniformly throughout the ~~e~~City

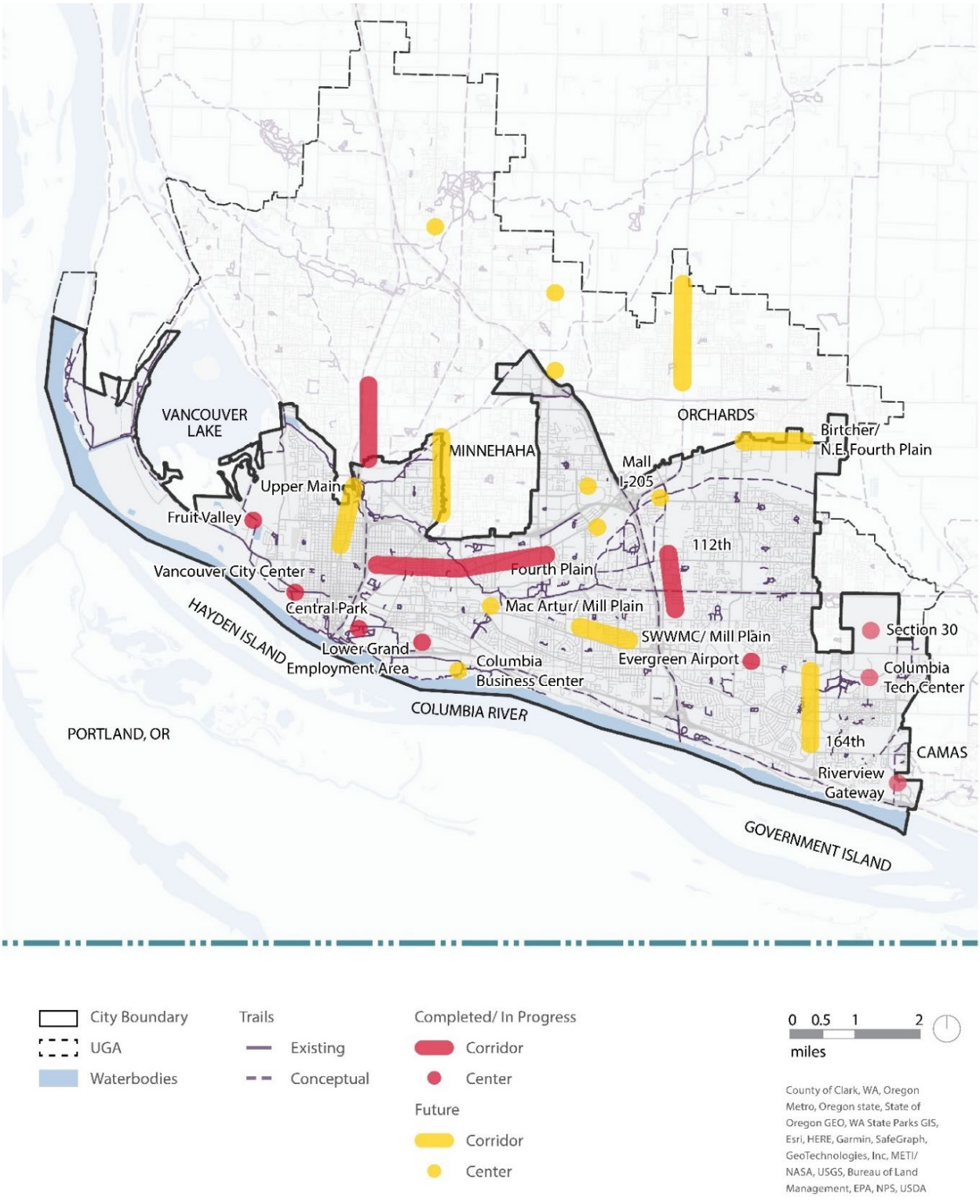
(City of Vancouver 2021a). These areas are envisioned to contain a mixture of employment, housing, and cultural opportunities, and serve as community focal points, building on the unique characteristics of individual districts. The type and intensity of activities and development will vary depending on local circumstances. These areas can also provide opportunities for growth where services can be provided more efficiently.

The Community Development element of the current Vancouver Comprehensive Plan includes policies designed to "achieve the full potential of existing and emerging urban activity centers and the corridors that connect them" through strategies such as promoting or reinforcing a unique identity or function for individual areas, planning for a compact urban form with multiple uses, encouraging innovative and efficient private development, providing a range of transportation options, and investing in public facilities and amenities to serve the areas.

~~Figure 10~~ Figure 10 Figure 12 shows the location of completed and future corridors and centers envisioned by the current Vancouver Comprehensive Plan where subarea planning has occurred or is planned. Subarea plans add greater detail, guidance and predictability to future development for specific geographic areas. Completed subarea plans include:

- Vancouver Central City Vision Plan (2007)
- Fourth Plain Corridor Subarea Plan (2007)
- Central Park Plan Update (2008)
- Lower Grand Employment Area Subarea Plan (2008)
- Riverview Gateway Subarea Plan (2009)
- Section 30 Urban Employment Center Subarea Plan (2009)
- Fruit Valley Subarea Plan (2010)
- 112th Avenue Subarea Plan (2011)
- Heights District Plan (2020)

~~Figure 10~~ Figure 12. Centers and Corridors from Current Vancouver Comprehensive Plan



Source: Design Workshop 2024

Current Shoreline Use

The City of Vancouver Shoreline Master Program (SMP), last updated in 2021, identifies Columbia River and Vancouver Lake as shorelines of statewide significance, which is a special category of shoreline that is considered of value to the entire state and has special rules and policies designed to preserve them for future generations (City of Vancouver 2021b). The SMP also identifies sections of Burnt Bridge Creek, Fifth Plain Creek, Lacamas Creek, Salmon Creek, Mill Creek, Curtin (Glenwood) Creek, and the Lake River as shorelines of the state, a category that includes all of the other water areas of the state and their associated shorelands.

The City assigns shoreline designations that are consistent with the Shoreline Management Act, the SMP guidelines, and the Comprehensive Plan, as described in Table 6. ~~Figure 11~~ ~~Figure 11~~ Figure 13 shows the locations of shoreline designations throughout the city.

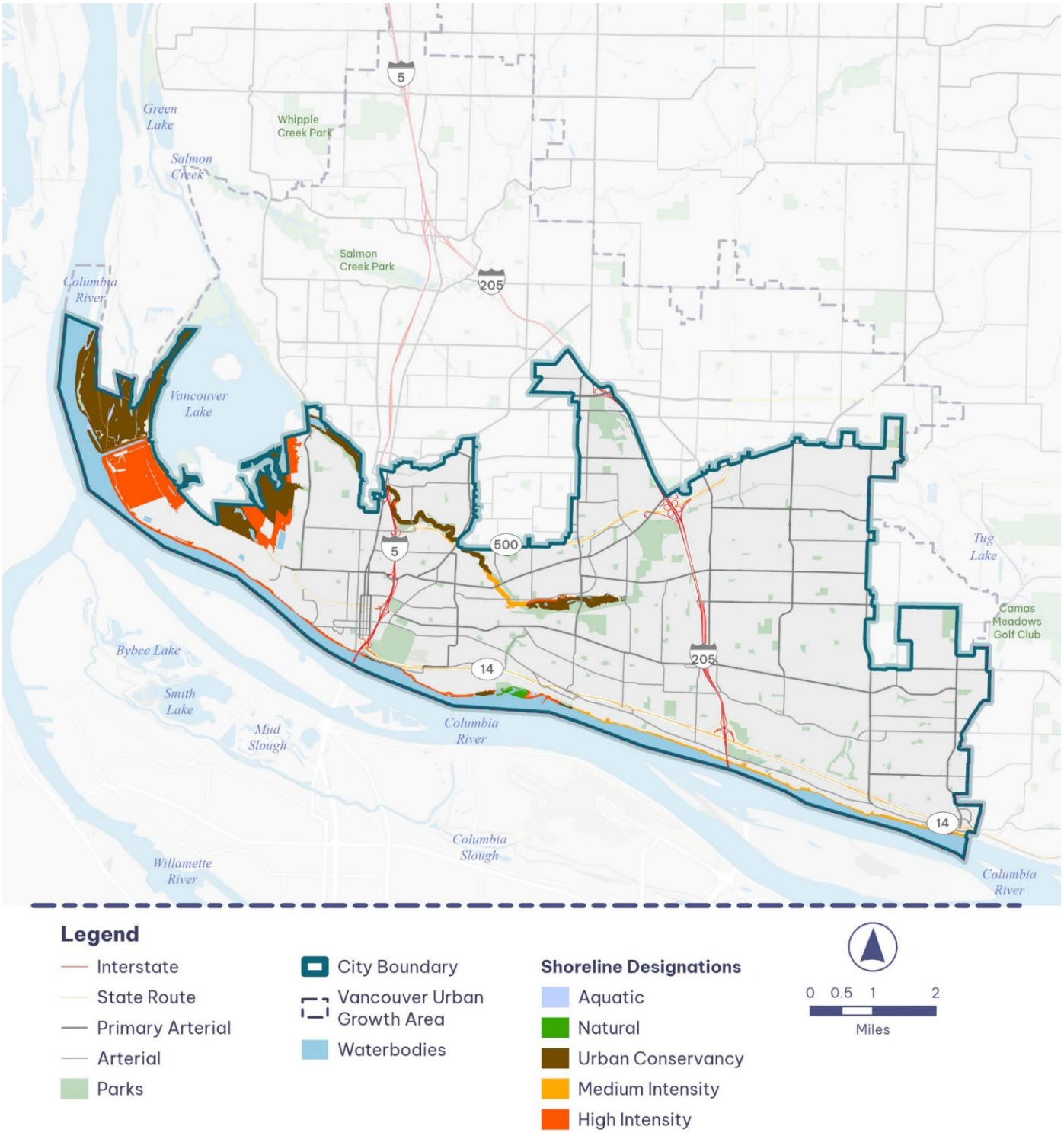
Table 6. Shoreline Designations, Descriptions, and Allowed Uses

Shoreline Designations	Description	Allowed Uses
Aquatic	Covers lands and waters waterward of the ordinary high-water mark.	Water-dependent uses such as boat launches; aquaculture; marinas; docks, piers, and mooring buoys; floating homes, and water-dependent recreational uses
Natural	Covers shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline ecological functions intolerant of human use.	Very low intensity uses, such as water-dependent recreational uses; ecological restoration, enhancement, and/or mitigation activities; and bioengineered or non-structural shoreline stabilization.
Urban Conservancy	Covers areas to be protected and restored shoreline ecological functions of open space, floodplains, and other sensitive lands where they exist in urban and developed settings.	Water-dependent or water-related residential uses, single-family residential, roadways and railroads, and utility uses

Shoreline Designations	Description	Allowed Uses
Medium Intensity	Generally, accommodates primarily residential development and related structures and other uses consistent with the designation criteria.	Agricultural uses, water-dependent and water-related commercial and institutional uses, recreational uses, single-family and multifamily residential, transportation, and utility uses.
High Intensity	Provides for high-intensity water-oriented commercial, transportation, and industrial uses while protecting the existing shoreline ecological functions and restoring ecological functions in shorelines where previously degraded.	Agricultural uses; water-dependent and water-related commercial, institutional, and industrial uses; transportation uses, and utility uses.

Source: City of Vancouver 2021b

~~Figure 11~~ Figure 13. Current Shoreline Designations



Source: Clark County n.d.

Current Community Population and Employment

The GMA requires the City to show that it can accommodate population and employment growth as part of the Comprehensive Plan Update. The proposed update to the City's Comprehensive Plan will plan for growth of at least 38,129 new housing units and 43,198 new jobs by 2045. These minimum growth targets are based on population projections from the Washington State OFM, Clark County, recent trends, state law, and City policy to plan for long-term housing and employment needs. The Housing section of this chapter provides more information about the City's housing unit targets.

The data presented in this Affected Environment section is generally from 2023 for consistency with the baseline year of analysis for the Comprehensive Plan Update.

Population

Vancouver has grown substantially over the past decade, increasing from a population of 161,791 in the 2010 decennial Census to 192,696 in the American Community Survey 2019-2023 five-year estimates (Census 2023a).

Table 7 summarizes demographic data for the City, including race, age, language spoken at home, income, and educational attainment (Census 2023a).

Table 7. Existing Population Characteristics for Vancouver and Washington State (2023)

Characteristic	City of Vancouver	State of Washington
Total Population	192,696	7,740,984
Total Households	79,747	3,020,558
Age (Table S0101)		
19 and younger	45,545 (24%)	1,854,050 (24%)
20 to 34 years old	43,706 (23%)	1,651,221 (21%)
35 to 49 years old	37,403 (18%)	1,557,494 (20%)
50 to 64 years old	35,185 (18%)	1,418,906 (18%)
65 or older	30,857 (16%)	1,259,313 (16%)
Race and Ethnicity (Table B03002)		
American Indian and Alaska Native	794 (0.4%)	63,389 (0.8%)

Characteristic	City of Vancouver	State of Washington
Asian	10,091 (5%)	720,927 (9%)
Black	5,694 (3%)	295,487 (4%)
Hispanic or Latine	33,115 (17%)	1,089,609 (14%)
Native Hawaiian and Other Pacific Islander	3,487 (2%)	52,674 (0.6%)
Other Race	937 (0.5%)	42,271 (0.5%)
Two or more races	12,618 (7%)	500,698 (6%)
White	125,960 (65%)	4,975,929 (64%)
Language Spoken at Home by limited English Speaking Households (Table B16002)		
Russian, Polish, or other Slavic language	679 (0.9%)	10,325 (0.3%)
Spanish	1,347 (1.7%)	42,026 (1.4%)
Other Indo-European	124 (0.2%)	5,984 (0.2%)
Chinese (Mandarin and Cantonese)	294 (0.4%)	18,185 (0.6%)
Vietnamese	187 (0.2%)	9,101 (0.3%)
Tagalong	43 (0.1%)	2,675 (0.1%)
Other Asian and Pacific Island Languages	155 (0.2%)	8,624 (0.3%)
Income and Poverty (Table DP03, B17017)		
Median Household Income	$80,618	$94,605
Household income below the poverty level	8,878 (11%)	294,072 (10%)

Characteristic	City of Vancouver	State of Washington
Household income at or above the poverty level	70,869 (89%)	2,726,486 (90%)
Educational Attainment (Table DP02)		
Less than 9th grade	4,154 (3%)	185,425 (3%)
9th to 12th grade, no diploma	7,778 (6%)	236,116 (4%)
High school graduate (includes equivalency)	33,007 (25%)	1,176,403 (22%)
Some college, no degree	33,564 (25%)	1,171,698 (22%)
Associate's degree	13,394 (10%)	542,351 (10%)
Bachelor's degree	26,925 (20%)	1,279,696 (24%)
Graduate or professional degree	15,419 (12%)	817,458 (15%)

Source: Census 2023a

Equity Index and Social Vulnerability Index

While developing the Comprehensive Plan Update, the City is accounting for equity considerations, including areas that may need additional investment based on current disparities. Part of this work includes identifying the locations of potentially underserved populations through an equity index, which focuses on assessing a set of metrics at the census tract level that include (City of Vancouver 2023c):

1. People of color (non-white and/or Hispanic/Latine)
2. People below 200% of the poverty level
3. Renters
4. Adults without a four-year degree
5. Households with limited English proficiency
6. People with disabilities
7. Youth under age 17
8. Older adults 65 and up

~~Figure 12~~ ~~Figure 12~~ Figure 14 identifies areas of higher equity populations (represented by higher equity index scores) to prioritize investments.

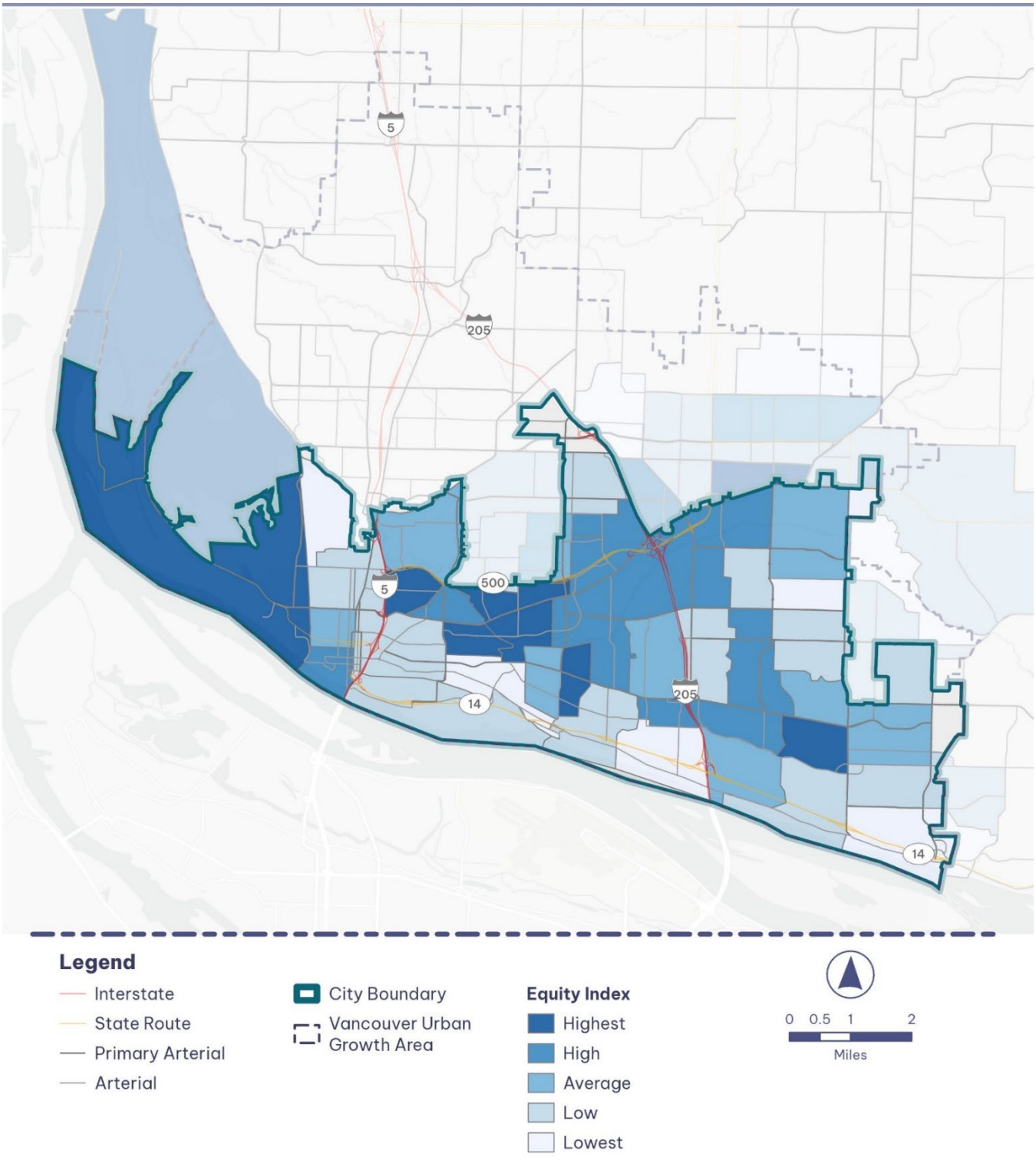
The City also uses the Social Vulnerability Index (SVI) developed by the Centers for Disease Control (CDC) and the Agency for Toxic Substance and Disease Registry (ATSDR), to assess populations most at risk during high-stakes situations like natural disasters and disease outbreaks (City of Vancouver 2023a). To determine social vulnerability, the CDC/ATSDR employs 16 factors, such as poverty, lack of vehicle access, and crowded housing, which are categorized into four themes: Socioeconomic Status, Household Characteristics, Racial and Ethnic Minority Status, and Housing Type/Vehicular Transportation Access (CDC/ATSDR 2022).

Understanding SVI is critical for emergency planners, city officials, public health authorities, state and local health departments, and nonprofit organizations. Together, they analyze municipalities at risk and provide support to the most vulnerable populations in the event of a disaster. This involves estimating the required supplies like food, water, medicine, and bedding, as well as the number of emergency personnel and shelters needed to assist people effectively (CDC/ATSDR 2022).

According to the CDC/ATSDR census tracts, the City experiences a high SVI. Areas with medium-high and high social vulnerability are concentrated along major interstates and arterial roads. The greater Vancouver area, on the other hand, displays a lower level of vulnerability, ranging from low to low-medium vulnerability.

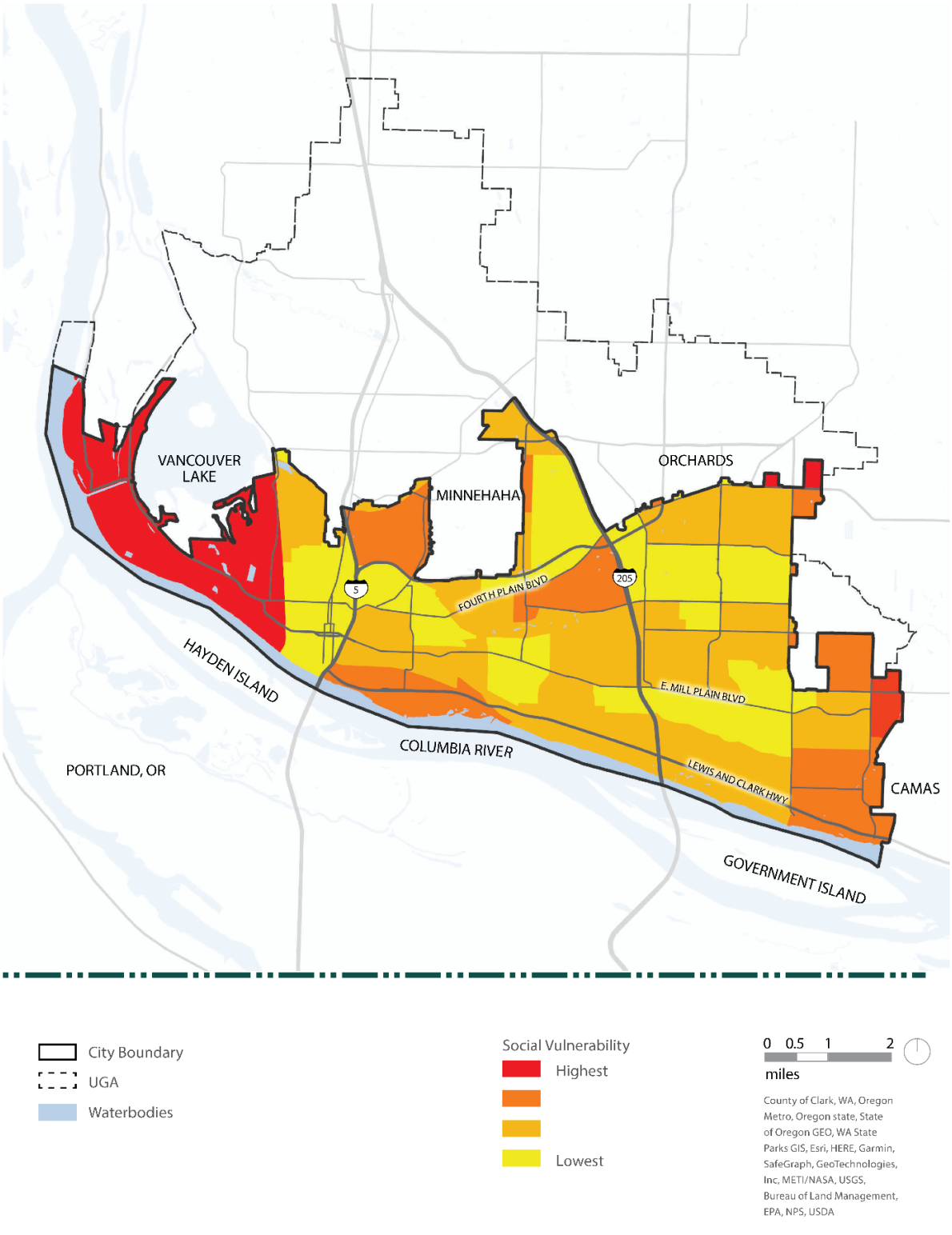
The SVI map (~~Figure 13~~ ~~Figure 13~~ Figure 15) is intended to reflect existing conditions and does not indicate priority areas for investment. However, it can be used as a tool to identify areas that are especially susceptible to the impacts of public investment when considered alongside other factors like residential density and housing costs. Public investment and private development can bring numerous benefits, but if equity considerations are not prioritized, it can lead to impacts on vulnerable communities, including pressures on the housing market and involuntary displacement.

~~Figure 12~~ Figure 14. Equity Index Map



Source: City of Vancouver 2023c

~~Figure 13~~ Figure 15. Social Vulnerability Index Map



Source: Design Workshop 2024

Employment

In 2023, Vancouver was home to more than 100,000 jobs (Census 2023a). The number of jobs in Vancouver increased rapidly between 2011 and 2023, growing from 77,846 jobs in 2011 to 101,285 jobs in 2023 (ECONorthwest 2024a; Census 2023a). 2023 is the baseline year of analysis for the Comprehensive Plan Update.

Service-based industries are concentrated in Vancouver and make up a large and growing share of the city's workforce (ECONorthwest 2024a). In both the ~~e~~City and the region, the health care and social assistance industry provided the largest share of jobs (almost 20%). Other industries that represented some of the largest shares of employment for the City included retail trade, educational services, manufacturing, accommodation and food services, and construction. Many of the largest employers in Clark County are based in Vancouver and represent key industry clusters in healthcare, technology, and education, including PeaceHealth, Vancouver Public Schools, the Vancouver Clinic, Bonneville Power Administration, and Hewlett-Packard.

Jobs are moving toward local employment hubs like Downtown Vancouver, the Vancouver Innovation Center, and large institutions (ECONorthwest 2024a). Employment trends at the census tract level show that employment is growing in these locations, while declining along older, suburban-style commercial areas like Fourth Plain Boulevard. While many cities (including Portland) have struggled to maintain Downtown areas post-pandemic, Vancouver is showing a stronger rebound than the region.

Land use mix can have an impact on wages due to the types of jobs that can be created in different districts. For example, a heavy industrial area would include capacity for manufacturing jobs, while a mixed-use area may include a combination of healthcare, retail, service industry, and professional services jobs. Data from the U.S. Census provides average wages for a range of industries in the Portland metropolitan area, which are assumed to occur in particular zoning districts, as shown in Table 8 (Census 2023b).

Table 8. Average Annual Wages for Job Types and Corresponding Zoning Districts

Proposed Zoning District[a]	Types of Jobs	Average Annual Wages
Heavy Industrial	Manufacturing	$77,000
Institutional/Campus	Public Administration, Education, Hospital	$85,000
Industrial Employment	Warehousing, Specialty Trade Contractors	$69,000
Low-Scale Neighborhood	Retail, Food/Drink Services	$39,000
Medium-Scale Neighborhood	Retail, Food/Drink Services	$39,000
Manufactured Home	None	N/A
Mixed Use	Healthcare, Retail, Food/Drink Services, Professional Services	$72,000
Regional Activity Center	Healthcare, Retail, Food/Drink Services, Professional Services	$72,000

Source: Census 2023b

Note:
a Proposed zoning districts would apply only under the two action alternatives. For the No Action Alternative, existing land use and zoning designations would remain in place. The corresponding zoning districts for the No Action Alternative are shown in Table 2.

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following land and shoreline use-related metrics:

- Consistency with land and shoreline use plans and policies
- Ability to accommodate adopted citywide minimum growth targets
- Compatibility with existing land uses
- Average wage of new jobs based on land use mix
- Level of commercial displacement risk

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Not all metrics are addressed, as some metrics do not have impacts common to all alternatives. Impacts for each alternative are discussed in the next subsections.

Consistency with Land and Shoreline Use Plans and Policies

Consistency with other land use plans and policies would vary among the alternatives, as discussed in the subsections for each alternative. None of the alternatives would propose changes to the Shoreline Master Program, and none of the proposed changes in the action alternatives would directly affect the SMP.

Ability to Accommodate Adopted Citywide Minimum Growth Targets

New population and job growth is expected to occur under all the alternatives. The City's current population growth trend is expected to continue, reaching an estimated population of 281,000 by 2045 inside current City limits, based on Washington State OFM projections, under all of the alternatives. The City will likely grow further than this through annexation of land currently in the unincorporated Vancouver Urban Growth Area over the next 20 years, but the extent or timing is not known. However, the pace and distribution of growth would vary under each alternative.

Under all alternatives, the actual pace and distribution of future growth would be influenced in part by the implementation of the current (No Action) or proposed (Alternatives 1, ~~or~~ 2 or Preferred Alternative) Comprehensive Plan policies, related regulations and actions, and by decisions made by individual property owners and developers. The No Action Alternative would not be able to accommodate the adopted growth targets.

Compatibility with Existing Land Uses

Because growth and development would occur under all alternatives, there would be some potential for compatibility issues between existing land uses where proposals for denser or more intense land uses border existing parcels with less dense, less-intense land uses. However, none of the alternatives would propose changes to land use and zoning designations that would mix uses that are clearly incompatible. For example, the location and size of heavy industrial lands would remain the same under all alternatives and would continue to prohibit incompatible uses such as housing within those zones. Likewise, heavy industrial uses would not be permitted in other zoning districts under any of the alternatives. In addition, no changes in land uses would occur on lands designated as parks and open space under any of the alternatives.

Middle housing would be allowed in single-family zones under all the alternatives, because under the No Action Alternative it would be allowed by the state imposition of a model

ordinance. Land use compatibility impacts could be more visible in the action alternatives, which propose greater density, intensity, and mixes of uses in more areas of the city. These potential impacts are further described in the Alternative 1, ~~and~~ Alternative 2 and Preferred Alternative subsections and in the Aesthetics subsection.

Average Wage of New Jobs Based on Land Use Mix

Although Alternatives 1 and 2 and the Preferred Alternative would have capacity for more jobs than the No Action Alternative, as discussed in Chapter 2, the overall average wage of new jobs is expected to be similar among the alternatives. All alternatives would focus most of their new job growth in industrial and mixed-use or commercial land use designations, which would result in similar average wages based on the job types assumed in these land uses (refer to Table 8 for these average wages).

Level of Commercial Displacement Risk

Commercial displacement is likely to occur to some extent under all alternatives ~~as~~ because the ~~c~~City will experience some amount of growth and development. Per the Clark County 2023 VBLM, parcels that are considered "underutilized" based on the building value per acre are considered more likely to redevelop than those that are fully "built" (Clark County 2023). Older buildings may also be more likely to redevelop based on their condition. Underutilized parcels with mixed-use, medium-density, or high-density land use designations under all of the alternatives may be more likely to redevelop into higher-density uses, which could potentially result in commercial displacements.

Alternatives 1 and 2 and the Preferred Alternative include more areas that would be designated as these zoning districts compared to the No Action Alternative and therefore may have higher potential for commercial displacement and need for mitigation. Under ~~both~~ the action alternatives, there would be ~~more than 1,000~~around 200[1] commercial buildings on parcels considered "underutilized" that are in medium/high-density residential or mixed-use/regional activity center designations (BERK 2025). However, ~~Alternatives 1 and 2~~the action alternatives would also create more opportunities for new business spaces and anti-displacement measures compared to the No Action Alternative. The subsections for each

[1] In conducting commercial displacement analysis for the Preferred Alternative, staff found that the initial data analysis for the Draft EIS double counted certain parcels and therefore the overall count of potential commercial displacement under the action alternatives was much higher. This error was corrected in the analysis for Alternatives 1 and 2 as well as the Preferred Alternative.

alternative below provide more information about areas that could be more vulnerable to commercial displacement.

No Action Alternative

Consistency with Land and Shoreline Use Plans and Policies

The No Action Alternative would be inconsistent with the City's proposed Comprehensive Plan Update and associated policy direction, as it assumes that no changes to the Comprehensive Plan would be implemented. The City is required by GMA to update its Comprehensive Plan every 10 years. By failing to implement updates to the Comprehensive Plan and provide land to accommodate anticipated future growth, the No Action Alternative would be inconsistent with GMA.

Because the No Action Alternative would not increase residential intensity and density along major corridors across the city, there would be fewer opportunities to locate housing units within close proximity of essential services. This approach would be inconsistent with the City's policy direction to foster connected and accessible neighborhoods, as discussed further in the Housing section.

Ability to Accommodate Adopted Citywide Minimum Growth Targets

The No Action Alternative would not have sufficient capacity to accommodate adopted citywide growth targets of at least 38,129 new housing units and 43,198 new jobs. Based on the assessment of current land use designations citywide, the No Action Alternative would have capacity for only approximately 29,600 new housing units and 16,600 new jobs.

Compatibility with Existing Land Uses

Because the No Action Alternative would retain existing land use and zoning designations, there would be no notable impacts to compatibility with existing land uses beyond those noted in the Impacts Common to All Alternatives section.

Level of Commercial Displacement Risk

Commercial displacement would likely occur to a lesser extent than under Alternatives 1 and 2 and the Preferred Alternative. Parcels potentially vulnerable to displacement due to building age and land use designation would be dispersed around the city. The No Action Alternative would also create fewer new spaces for businesses and maintain existing ~~e~~City policies, which would provide less opportunity for new anti-displacement measures (BERK 2025).

Alternative 1

Consistency with Land and Shoreline Use Plans and Policies

Alternative 1 would be compatible with the City's proposed Comprehensive Plan Update because it assumes the proposed new land use designations and zoning code would be implemented. Notably, the zoning designation of all properties within the City limits would change from what they are today.

Allowing increased residential density and intensity, and a greater mix of uses, along major corridors across the ~~e~~City would place essential services in greater proximity to more housing units compared to the No Action Alternative. This approach would be consistent with the City's policy direction to foster connected and accessible neighborhoods, as discussed further in the Housing section.

Ability to Accommodate Adopted Citywide Minimum Growth Targets

Under Alternative 1, proposed changes in land use and zoning designations would result in a higher capacity for new housing units and jobs than the No Action Alternative and the Preferred Alternative but a lower capacity than Alternative 2. Based on market feasibility and redevelopment potential, Alternative 1 would have capacity for approximately 45,100 new housing units and 46,000 new jobs citywide, which exceeds the City's minimum 2045 planning targets.

Compatibility with Existing Land Uses

Alternative 1 would have a modestly higher potential for incompatibility between existing land uses compared to the No Action Alternative, as it would accommodate denser and more intense building types and growth, and a greater mix of residential and commercial land uses, in more areas of the city.

For example, existing areas of predominantly single-family residential development would be redesignated as Low-Scale Neighborhoods, which would allow small-scale commercial activities like cafés, salons, professional services, and restaurants mostly serving the surrounding neighborhood. This new mix of uses would provide benefits to neighboring residents who would have more potential opportunities for services within walking distance; however, the mix of uses would need to be managed to ensure compatibility.

In addition, Low-Scale Neighborhoods that would be adjacent to areas planned for Medium-Scale Neighborhoods under Alternative 1 could experience greater incompatibility due to the scale of development allowed under the Medium-Scale Neighborhood zoning district, as discussed further in the Aesthetics section. These changes would be most pronounced in West Vancouver just north of downtown, in Central Vancouver along East Mill Plain

Boulevard, and in East Vancouver along Mill Plain Boulevard, 164th Avenue, and 192nd Avenue.

Level of Commercial Displacement Risk

Parcels that are potentially vulnerable to commercial displacement based on age or "underutilized" status and land use designation would be similar under ~~both~~ the action alternatives. These parcels would include older buildings dispersed across the city, as well as buildings on "underutilized" parcels located around the city, with concentrations west of I-5 in West Vancouver, around the Fourth Plain area and just north of SR 14 in Central Vancouver, and along Mill Plain Boulevard in East Vancouver. However, ~~both~~ the action alternatives would also create more opportunities for new business spaces and include anti-displacement measures (BERK 2025).

Alternative 2

Consistency with Land and Shoreline Use Plans and Policies

Like Alternative 1 and the Preferred Alternative, Alternative 2 would be compatible with the City's proposed Comprehensive Plan Update because it assumes the proposed new land use designations and zoning code would be implemented. Like in Alternative 1 and the Preferred Alternative, the zoning designation of all properties within the City limits would change from what they are today.

Like Alternative 1 and the Preferred Alternative, allowing for increased residential density and intensity, and a greater mix of uses, along major corridors across the ~~c~~City would place essential services in greater proximity to more housing units. This approach would be consistent with the City's policy direction to foster connected and accessible neighborhoods, as discussed further in the Housing section.

Ability to Accommodate Adopted Citywide Growth Targets

With the proposed changes in land use and zoning designations, Alternative 2 would have the highest capacity for new housing units and jobs of all the alternatives. Based on market feasibility and redevelopment potential, Alternative 2 would have capacity for approximately 50,700 new housing units and 49,300 new jobs citywide, which exceeds the City's minimum 2045 planning targets and is about 10% higher than Alternative 1 and the Preferred Alternative.

Compatibility with Existing Land Uses

Alternative 2 would have the most potential for incompatibility between existing land uses compared to the No Action Alternative, ~~and~~ Alternative 1 and the Preferred Alternative, as it would accommodate denser and more intense building types and growth, and a greater mix of residential and commercial land uses, in most areas of the city. Existing single-family

residential areas that would be designated as Medium-Scale Neighborhoods would experience the greatest potential changes in the mix of land uses and scale of development. More of these changes would occur throughout the city, similar to the Preferred Alternative, than under Alternative 1 or the No Action Alternative but would be most pronounced in West Vancouver north of downtown, in Central Vancouver along East Mill Plain Boulevard and Northeast Fourth Plain Boulevard, and in large parts of East Vancouver along and between the Mill Plain Boulevard, 164th Avenue, and 192nd Avenue corridors.

Level of Commercial Displacement Risk

Under Action Alternative 2, potential commercial displacement risk impacts and opportunities would be similar to those under Alternative 1 and the Preferred Alternative (BERK 2025).

Preferred Alternative

Consistency with Land and Shoreline Use Plans and Policies

As with Alternatives 1 and 2, the Preferred Alternative would be compatible with the City's proposed Comprehensive Plan Update because it assumes the proposed new land use designations and zoning code would be implemented. The zoning designations of all properties within the City limits would change from what they are today.

As with Alternatives 1 and 2, allowing for increased residential density and intensity, and a greater mix of uses along major corridors across the City would place essential services in greater proximity to more housing units. This approach would be consistent with the City's policy direction to foster connected and accessible neighborhoods, as discussed further in the Housing section.

Ability to Accommodate Adopted Citywide Growth Targets

Under the Preferred Alternative, proposed changes in land use and zoning designations would result in a higher capacity for new housing units and jobs than the No Action Alternative and a lower capacity than Alternatives 1 and 2. Based on market feasibility and redevelopment potential, the Preferred Alternative would have capacity for approximately 44,100 new housing units and 45,100 new jobs citywide, which exceeds the City's minimum 2045 planning targets.

Compatibility with Existing Land Uses

The Preferred Alternative would have a modestly higher potential for incompatibility between existing land uses compared to the No Action Alternative and would be similar to Alternatives 1 and 2, as it would accommodate denser and more intense building types and growth, and a greater mix of residential and commercial land uses, in more areas of the city.

Similar to Alternatives 1 and 2, existing areas of predominantly single-family residential development would be redesignated as Low-Scale Neighborhoods, which would allow small-scale commercial activities like cafés, salons, professional services, small medical offices, and restaurants mostly serving the surrounding neighborhood. This new mix of uses would provide benefits to neighboring residents who would have more potential opportunities for services within walking distance; however, the mix of uses would need to be managed to ensure compatibility.

Similar to Alternatives 1 and 2, existing single-family residential areas that would be designated as Medium-Scale Neighborhoods would experience the greatest potential changes in the mix of land uses and scale of development. The Preferred Alternative would distribute Medium-Scale Neighborhoods throughout the city, whereas Alternatives 1 or 2 focused Medium-Scale Neighborhoods in more limited locations in West, Central and East Vancouver.

As with Alternatives 1 and 2, Low-Scale Neighborhoods that would be adjacent to areas planned for Medium-Scale Neighborhoods under the Preferred Alternative could experience greater incompatibility due to the scale of development allowed under the Medium-Scale Neighborhood zoning district, as discussed further in the Aesthetics section.

Level of Commercial Displacement Risk

Under the Preferred Alternative, potential commercial displacement risk impacts and opportunities would be similar to those under Alternative 1 and 2 (BERK 2025).

Avoidance, Minimization, and Mitigation Measures

Land and shoreline use under all alternatives would be subject to the requirements in current applicable state, county, and city land and shoreline use laws and policies, including the GMA, Clark County Countywide Planning Policies, and the City's SMP.

The No Action Alternative would remain subject to the existing Comprehensive Plan goals and policies regarding Land and Shoreline Use the City's Land Use and Development Code (VMC Title 20), including SEPA rules and policies in VMC Chapter 20.790.

The action alternatives would be subject to the City's proposed Comprehensive Plan Update Land Use and Development chapter goals and policies, and proposed revisions to VMC Title 20 with the new development and zoning code for the implementing base land use districts.

The following measures would help to avoid, minimize, and mitigate potential land and shoreline use impacts under the action alternatives:

- Adopt and adhere to the updated Comprehensive Plan Land Use and Development chapter goals and policies. The proposed goals and policies ~~under consideration~~ include:
    - Use the Growth Concept and Comprehensive Plan Land Use Designations to guide how and where growth and development occurs in the City.
    - Ensure rezoning of property is in alignment with the Land Use Designations identified in the Comprehensive Plan, and the City is able to provide adequate infrastructure and municipal services to serve the proposed use.
    - Focus the City's highest intensity of future growth in the Urban Core to reinforce it as the region's primary destination for services, amenities, nightlife and employment.
    - Develop Regional Centers as compact, high-intensity mixed-use hubs that provide a balance of housing, jobs, and services that complement the Urban Core, that are connected through the high-capacity transit network.
    - Focus growth and investment in Local Centers to create compact, mixed-use districts along key corridors and intersections that provide daily goods, services, jobs, in a manner that complements uses in Regional Centers and the Urban Core.
    - Develop Neighborhood Centers as accessible, neighborhood-serving districts that bring daily goods, services, and gathering spaces closer to where people live, supported by a mix of low- to medium-scale housing.
    - Direct new employment growth into Employment Centers with close proximity to housing, commercial activities, public services, employment and amenities.
    - Develop and update subarea plans for ~~key~~ centers identified in the plan's growth concept, facilitating the development of integrated residential, commercial, employment and community uses ~~and corridors citywide to facilitate integrated land uses~~.
    - Develop regulations that provide transitions between zoning districts to ensure compatibility of adjacent land uses.
    - Promote efficient land use by focusing new development in areas with existing infrastructure and moving toward a more compact urban form.
    - Support efforts to retrofit or repurpose underutilized buildings, structures, and infrastructure to develop new housing and commercial spaces.
    - Prioritize, f~~F~~acilitate and incentivize development on infill and underutilized ~~lands~~ lots and brownfield sites.
    - Facilitate and expand allowances for shared utilization of parking facilities, and implement strategic pricing mechanisms to regulate on-street parking availability in Mixed Use Neighborhoods and Regional Activity Centers.
    - Ensure impact fees, system development charges and utility rates are proportional to development scale.

- Foster a safe community by encouraging street level activity and thoughtful building and infrastructure design that enhance public safety and community well-being.
- Expand access to municipal and community-based services and amenities by prioritizing investment in underserved areas.
- Tailor regulations, incentives and investments to facilitate development and community resources ~~and community resources~~ near current and future transit stations, ensuring new development is accessible to ~~promoting access by~~ all community members, including historically excluded and underserved communities and those most burdened by transportation cost or reliant on public transit.
- Incentivize and remove regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods and ~~Incentivize and remove regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods.~~ support establishment of community-owned or cooperative grocery models to strengthen neighborhood food access where the private market fails to meet demand.
- Implement anti-displacement strategies and actions that protect residents and businesses in advance of public investment so communities can remain in place and benefit from improvements.
- Conserve and invest in industrial lands and other areas that provide employment for middle- and high-wage jobs.
- Utilize City-controlled real estate to provide affordable commercial leasing opportunities for small and emerging businesses.
- Support businesses that create high-quality jobs by reducing barriers to growth, streamlining development processes, and ensuring access to necessary resources and infrastructure.
- Protect existing Critical Areas within the City, and Shorelines of Statewide Significance, and ensure no net loss of ecological functions through avoidance of impacts, conservation design principles, and compensatory mitigation when loss of ecological function cannot be avoided.
- Work with Clark County and residents in the Urban Growth Area to facilitate orderly, fiscally sustainable annexations, ensuring urban level of service standards with logical boundary considerations.
- Continue to update the Comprehensive Plan and implementing regulations in response to the annual review process, state-mandated 5-year Implementation Progress Report, and 10-Year periodic review requirement that includes updates to long-term growth forecasts and regional land capacity analysis.

- Adopt and adhere to the development standards included in the proposed ~~form-based~~ new zoning code and development regulations, which would cover topics such as:
    - Base zoning district requirements, including standards for base density, height range, allowed building types, use requirements and additional requirements such as open space, overlay districts and environmental regulations.
    - Building type requirements, including applicability in each base zoning district, lot dimensions and coverage, building placement and build-out, building and story height, parking ~~ratio and location~~ regulations and other additional requirements specific to a building type.
    - Use requirements for the base zoning districts, which identifies the categories of uses allowed, types of use approvals, types of primary uses, and specific standards that are applicable to land use permits for the base zoning districts.

Future site-specific development would be subject to additional SEPA review, including an analysis of potential land and shoreline use impacts.

Significant Unavoidable Adverse Impacts

The No Action Alternative would have significant adverse impacts to land and shoreline use because it would not provide sufficient capacity for development to comply with the GMA and meet the City's minimum 2045 housing and jobs targets. The action alternatives have the potential to create impacts on land and shoreline use as a result of changes in land use and zoning designations. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to land and shoreline use are anticipated for Alternative 1, ~~or~~ Alternative 2, or the Preferred Alternative.

Housing

Methodology

Analysts reviewed relevant information about the existing housing supply and types, affordability, and displacement risk, including the following sources:

- CoStar commercial real estate database (CoStar 2023)
- Housing Needs and Land Capacity Analysis (ECONorthwest 2026)
- Our Vancouver Housing Needs Assessment (ECONorthwest 2024b)
- Our Vancouver Health Impact Assessment (BERK 2025)
- Redfin (2023)
- 2020 Reside Vancouver Anti-Displacement Plan (Thread Community Planning 2020)
- US Census Bureau American Community Survey (Census 2023a)

This EIS uses primarily ACS 2019-2023 five-year and 2023 one-year data as the basis for analysis for consistency with other recent studies completed for the Comprehensive Plan Update. 2023 is the baseline year of analysis for the Comprehensive Plan Update.

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Level of supply, diversity, and potential cost of housing
- Amount of new housing in areas with high displacement risk
- Amount of new housing in connected and accessible neighborhoods
- Level of housing capacity for all income bands
- Consistency with housing plans and policies

Affected Environment

The data presented in this Affected Environment section is generally from 2023 for consistency with the baseline year of analysis for the Comprehensive Plan Update.

Current Housing Supply and Mix

In 2023 there were 90,263 total housing units in Vancouver, a more than 25% increase from 71,649 in 2011 (Census 2023a).The dominant type of housing is single-family detached housing (43,209 units), which composes nearly half (48%) of the total number of housing units in Vancouver, compared to 65% of housing units in Clark County. Single-family housing also makes up 73% of the City land area zoned for residential districts. The remaining housing stock in Vancouver includes an estimated 35% multifamily housing (31,702 units), which is housing consisting of five or more units, and 16% "plex housing" (14,092 units), which is single-family attached units, duplexes, triplexes, and fourplexes (Census 2023a).

Vancouver has a higher share of multifamily housing than Clark County, with nearly one-half (around 43%) of Vancouver residential buildings having more than one unit compared to about 25% of the county's buildings (Census 2023a). Permit data analysis shows a steady increase in multifamily development in recent years.

The predominant housing types vary from west to east depending on geographic areas of the city. West Vancouver, including downtown neighborhoods, generally have older buildings and smaller lots with denser uses, including traditional apartments and vertical mixed-use buildings. Along the Vancouver Waterfront, there are newer mixed-use high-rise buildings accommodating denser residential uses. Heading north of downtown Vancouver toward Burnt Bridge Creek, there are communities with older, low-density, single-family detached residential development.

In Central Vancouver, lower-density, single-family residential development generally dominates the housing supply, except for neighborhoods such as Harney Heights, North Garrison Heights and Columbia Way, where there are several multifamily residential developments.

In East Vancouver, the housing stock is also predominantly suburban-style, single-family detached buildings. There are pockets of medium- to high-density multifamily residential areas in the Fircrest and Fisher's Landing neighborhoods and east of I-205 along the Mill Plain Boulevard corridor.

Housing Needs

From 2023 to 2045, the City will need a total of 38,129 new housing units to support projected growth, according to the Our Vancouver Housing Needs Assessment (ECONorthwest 2024b, ECONorthwest 2026). Overall, this means an estimated 1,733 housing units need to be built or created on average per year from 2023 to 2045 to meet the City's housing needs. As the existing City housing stock has increased by around 1,466 housing units per year over the last decade from 2012 to 2022 (per OFM data), housing production will need to increase by around 267 housing units per year.

To comply with H.B. 1220, local governments must plan for and accommodate housing affordable to all income levels. The Housing Needs and Land Capacity Analysis determined that the 2045 housing target should include the following types of units (ECONorthwest 2026):

- 2,600 ~~2,651~~ Permanent Supportive Housing units (subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services)
- 4,423 ~~4,371~~ units for households below 30% area median income (AMI) (extremely low income)
- 5,890 units between 30 to 50% AMI (low income)
- 5,788 housing units between 50 and 80% AMI (low income)
- 3,351 units between 80 to 100% AMI (moderate income)
- 3,175 housing units between 100 to 120% AMI (moderate to middle income)
- 12,902 housing units over 120% AMI (high income)
- 1,405 ~~1,374~~ emergency shelter beds

The housing units needed by income category were updated since the Draft EIS to better align with the final Clark County housing allocations for Permanent Supportive Housing units and emergency shelter beds. The units needed for the other income levels do not reflect the Clark County allocations because the City completed the 2024 Housing Needs Assessment

using the Washington State Department of Commerce Housing for All Planning Tool (HAPT), prior to the City receiving the final Clark County housing allocations.

This analysis indicates that about one-third of new housing units would need to be affordable to households at or below 50% of AMI.

Current Home Occupancy

The vacancy rate for all housing units in the ~~e~~City was 6%, slightly higher than Clark County (4%) (Census 2023a). The city's overall vacancy rate has remained stable since 2011. Vancouver has seen a recent spike in vacancy rates among two-bedroom units in multifamily housing, jumping from just under 4% in 2022 to almost double that at 7% in 2023, likely related to recent housing construction (ECONorthwest 2024b). Housing market assessments often use a 5% standard vacancy rate that implies a balance between housing supply and demand. Vancouver multifamily vacancy rates closely follow those of Clark County at 7% compared to Clark County's 8%.

Current Home Ownership

Approximately 51% of Vancouver residents rent their homes, while the remaining 49% own their homes (Census 2023a). Vancouver's renter population is larger than Clark County (33%) and Washington State as a whole (36%).

In Vancouver, the largest share of renter households lived in multifamily buildings with five units or more (63%), "plex housing" (21%), and single detached units (15%) (Census 2023a). In greater Clark County, the distribution is similar.

Among owner households in both Vancouver and Clark County, the largest share lived in single detached units (84% and 87%, respectively), followed by "plex housing" (9% and 6%, respectively) and multifamily units (5% and 2% respectively) (Census 2023a).

Racial disparities exist in Vancouver's housing access. Asian, white, and American Indian/Alaska Native households have the highest rates of homeownership (at 64%, 52% and 48% respectively), while Hispanic/Latine, Black, and two or more race households have the lowest rates of homeownership (at 24%, 32% and 34% respectively). (Census 2023a).

Housing Costs

Both rental and ownership costs have far outpaced income growth in the ~~e~~City, with median home prices nearly tripling and average rents increasing 60% from 2012 to 2023. The widening gap between housing costs and incomes indicates declining affordability in Vancouver's ownership and rental market (ECONorthwest 2024b).

As of June 2023, the median home sale price in Vancouver was roughly $477,000 (Redfin 2023). The ~~e~~City's median home prices were roughly $50,000 lower than the county overall ($527,000). However, city and county home prices increased at a similar rate since 2012, nearly tripling (a 174% increase) over the decade from 2012 to 2023. Additionally, while median Vancouver home prices were lower than both Hillsboro ($514,000) and Portland ($511,000), Vancouver prices have increased at a faster rate than both cities.

In 2021, the median monthly mortgage payment was $1,734, and in March 2022, the average market rent for a one-bedroom unit in Vancouver was $1,411 (CoStar 2023). As of 2023, the average rent in Vancouver was $1,673, which was similar to the average rent of $1,671 in Clark County (CoStar 2023). From 2012 to 2023, average Vancouver rents increased by more than $600, or 56%, surpassing average rents in Portland (CoStar 2023).

Cost burdening tends to disproportionately impact renters in comparison to homeowners, and this tendency holds true for the City and Clark County as a whole. Renters are nearly three times more likely to be cost burdened than homeowners. In 2023, about 53% of renters in Vancouver were cost burdened (spending more than 30% of their income on rent and utilities), including over a quarter of all renters (26%) who were severely cost burdened, spending more than 50% of their income on rent and utilities (Census 2023a).

Vancouver provides 1,243 rent-restricted affordable units sponsored by the City's Affordable Housing Fund that are either existing or currently in development (ECONorthwest 2024b). Of these units, 26% are set aside for seniors, 43% are reserved for households earning less than 60% of AMI, and 9% of the units are set aside specifically for populations with disabilities or mental health issues.

Displacement Risk

Some Vancouver communities face displacement risks, but few areas have reached late-stage gentrification, which means a neighborhood has lost an increasingly higher share of vulnerable populations and is experiencing increasingly higher housing costs (ECONorthwest 2024b). The Image neighborhood is the only area that has reached late-stage gentrification based on the City's methodology. The Fourth Plain Village and North Image neighborhoods fall into the Dynamic typology, which are areas where focusing new anti-displacement actions can still help to prevent loss of vulnerable populations and before they reach late-stage trends.

Neighborhoods facing early-stage gentrification are concentrated in Central Vancouver, including along Fourth Plain Boulevard, I-205, and WA 500. In these areas, preserving low-cost housing and preventing loss of vulnerable populations can help keep neighborhoods from advancing further into mid- or late-stage gentrification.

The most effective anti-displacement strategies vary by what stage a neighborhood is currently experiencing. The City's 2020 Reside Vancouver plan presents recommended strategies for preventing displacement, which include citywide and geographically specific strategies for the Fourth Plain Corridor. Strategies to prevent displacement can include actions that preserve existing low-cost housing, create new affordable housing options, increase economic opportunities for residents, and support homeownership to stabilize households depending on how much low-cost housing is still available and how many vulnerable residents are still located in the area.

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following housing-related metrics:

- Level of supply, diversity, and potential cost of housing
- Amount of new housing in areas with high displacement risk
- Amount of new housing in areas with greater percentages of trips under 5 miles near active transportation networks
- Amount of new housing in connected and accessible neighborhoods
- Level of housing capacity for all income bands
- Consistency with housing plans and policies

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Level of Supply, Diversity, and Potential Cost of Housing

An increase in citywide housing supply would be possible under all the alternatives to varying extents. All of the alternatives would result in a greater diversity of allowed housing types to some extent because they assume that H.B. 1110 would be implemented through the imposition of the state model ordinance allowing middle housing, if local standards are not adopted. H.B. 1110 requires cities like Vancouver to allow for at least four dwelling units per lot on all lots, up to six dwelling units per lot if within 0.25 mile of a major transit stop or if two of the units are affordable. All land currently designated as Urban Lower Density under the No Action Alternative or as Low-Scale Neighborhood under Alternatives 1 and 2 and the Preferred Alternative would have the potential for a greater diversity of housing types, such as duplexes, quadplexes, sixplexes, and townhomes, because of H.B. 1110's requirements.

Under all alternatives, the pace and location of development of future new housing units would be influenced in part by the implementation of the current (No Action) or proposed

(Alternatives 1 or 2 or the Preferred Alternative) Comprehensive Plan policies, related regulations and actions, and by decisions made by individual property owners and developers.

The cost of housing under all alternatives would be influenced by a variety of factors, including construction costs, market conditions, and government incentive programs.

New Housing with High Displacement Risk

All alternatives are likely to have some level of residential displacement due to growth and redevelopment. Table 9 summarizes the estimated number of new housing units that would be built in areas defined as high risk in the Washington State Displacement Risk Map (Commerce 2023~~n.d.~~). Under all alternatives, at least 14% of housing unit capacity or growth would be located in these high displacement risk areas.

Table 9. Estimated Capacity for New Housing Units in High Displacement Risk Areas

Metric	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Projected Capacity for New Housing Units in High Displacement Risk Areas	9,400[a]	6,500	8,500	8,900
Percent of Total Projected Capacity for New Housing Units	32%[a]	14%	17%	18%

Source: BERK 2025

Note:

a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Amount of New Housing in Connected and Accessible Neighborhoods

Although the ~~three~~ four alternatives would distribute new housing capacity and growth in different ways, they would all result in the potential for a substantial amount of new housing in connected and accessible neighborhoods. Connected and accessible neighborhoods are intended to support a mix of uses within a 15-minute walk to provide opportunities for shopping, entertainment, cultural amenities, and employment within proximity to housing.

As summarized in Table 10, more than 40% of the new housing capacity in each alternative is in areas with five or more services or amenities within walking distance. These services or amenities include full-service grocery stores, transit stops, parks and open spaces, trails, libraries, ambulatory healthcare services, schools, and other essential places such as higher

education institutions (Design Workshop 2024). This proximity to services would benefit resident wellbeing in terms of access to healthcare, food, and daily needs, as well as opportunities to interact with others, under all alternatives.

Table 10. Estimated Capacity for New Housing Units in Connected and Accessible Neighborhoods

Metric	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Projected Capacity for New Housing Units in Connected and Accessible Neighborhoods	16,100[a]	18,700	21,700	21,500
Percent of Total Projected Capacity for New Housing Units	54%[a]	42%	43%	44%

Source: BERK 2025

Note:

a The No Action is based on capacity only and does not account for the feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Level of Housing Capacity for All Income Bands

All of the alternatives would provide new housing units throughout the city; however, there would be varying capacity for housing that serves all income bands. In general, it is assumed that alternatives with a higher capacity for new housing units would allow for the greatest opportunity to construct different housing typologies, which in turn have the potential to be more affordable for a broader range of income levels, as discussed in the subsections for each alternative. However, as discussed in the Housing Needs Assessment, certain lower-income bands are likely unable to be served without additional subsidies for housing. Development of regulated affordable housing can face a number of challenges and typically requires sizable gap financing to make projects feasible (ECONorthwest 2024b).

Compatibility with Housing Plans and Policies

All of the alternatives would allow for new housing units throughout the city, which is broadly compatible with the City's Housing Action Plan goal of building substantially more housing units over the next 20 years. However, the action alternatives would be more compatible with these goals, as discussed in the subsections for each alternative.

No Action Alternative

Level of Supply, Diversity, and Potential Cost of Housing

The No Action Alternative would not meet the City's minimum 2045 housing unit targets because it would not implement H.B. 1220 or H.B. 1337, and it would not allow denser housing typologies in as many areas of the ~~e~~City as Alternatives 1 or 2 or the Preferred Alternative ~~2~~. The No Action Alternative would have the least potential for providing adequate, affordable housing to meet identified needs. As discussed in the Housing Needs subsection, approximately 13,000 new housing units are needed for people with incomes of less than 80% AMI. To meet this need, more than 40% of new housing units under the No Action Alternative would need to be constructed for this income level. Without implementation of H.B. 1220 or H.B. 1337, the No Action Alternative would not include additional policy or zoning provisions to address the need for more diversity in housing supply throughout the ~~e~~City to accommodate more affordable housing.

Under the No Action Alternative, residents, developers, and homebuilders would not receive the benefits of the proposed zoning code update, which is designed to make requirements easier and simpler to understand, and in turn to reduce costs and barriers to housing production.

New Housing with High Displacement Risk

The No Action Alternative would have the highest number of new housing units in areas with high displacement risk compared to Alternatives 1 and 2 and the Preferred Alternative, as shown in Table 9. This is likely because the No Action Alternative would have a larger estimated capacity for new housing units in Central Vancouver, which has large areas of high displacement risk according to the Washington State Department of Commerce mapping tool, as compared to Alternatives 1 and 2 and the Preferred Alternative (Commerce n.d.).

Amount of New Housing in Connected and Accessible Neighborhoods

There would be a lower number of new housing units in connected and accessible neighborhoods under the No Action Alternative compared to Alternatives 1 and 2 and the Preferred Alternative ~~2~~, as shown in Table 10. Areas with capacity for new housing outside of connected and accessible neighborhoods would be distributed across the city, with larger amounts predicted in Central and East Vancouver than West Vancouver.

Level of Housing Capacity for All Income Bands

The No Action Alternative would have the lowest level of housing capacity for all income bands because it would have the lowest capacity for new housing units in general. In addition, zoning designations would remain the same, which are currently more restrictive in housing types than the zoning districts proposed under the action alternatives.

Compatibility with Housing Plans and Policies

The No Action Alternative would not be fully compatible with the City's housing plans and policies because it would not fully align with the Housing Action Plan, which includes strategies such as updating the ~~c~~City code to increase housing density and types.

Alternative 1

Level of Supply, Diversity, and Potential Cost of Housing

Alternative 1 would result in a greater potential diversity of housing types than the No Action Alternative because, based on market feasibility and redevelopment potential (see Appendix B for more information), it would have a greater capacity for new housing units citywide and would designate more land area as Medium-Scale Neighborhoods, Mixed-Use Neighborhoods, and Regional Activity Centers. These denser zoning districts allow for a broader range of housing typologies with more units. East Vancouver (between I-205 and the eastern City limits) would have the greatest capacity for new housing units.

Alternative 1 would also have a greater potential for meeting affordable housing needs compared to the No Action Alternative because of the greater capacity for new housing units. Residents, developers, and homebuilders would receive the benefits of the proposed zoning code update, which is designed to make requirements easier and simpler to understand, and in turn to reduce costs and barriers to housing production.

New Housing with High Displacement Risk

Alternative 1 would have the lowest capacity for new housing units in areas with high displacement risk compared to the No Action Alternative, ~~and~~ Alternative 2 and the Preferred Alternative, as shown in Table 9.

Amount of New Housing in Connected and Accessible Neighborhoods

Alternative 1 would have greater capacity for new housing units in connected and accessible neighborhoods than the No Action Alternative, but less than Alternative 2 and the Preferred Alternative, as shown in Table 10. Areas with capacity for new housing outside of existing connected and accessible neighborhoods would be located primarily in East Vancouver. Some parts of Central Vancouver, particularly near the Columbia River, would also have capacity for new housing units where there is low existing access to services. However, under the new zoning districts, some commercial and retail services would be allowed in traditionally residential-only areas, which could increase the potential for more services in those areas.

Level of Housing Capacity for All Income Bands

Alternative 1 would have higher levels of housing capacity for all income bands than the No Action Alternative because it would have a much higher capacity for new housing units in

general. The new zoning designations and associated development regulations under Alternative 1 would allow for a greater diversity of housing types than the No Action Alternative. The level of housing capacity for all income bands would be similar to Alternative 2 and the Preferred Alternative but would be slightly lower because of the relatively lower capacity for new housing units.

Compatibility with Housing Plans and Policies

Alternative 1 would be compatible with the City's housing plans and policies because its proposed land use and zoning designations would provide sufficient capacity to exceed the City's 2045 housing target and would align with the Housing Action Plan, which includes strategies such as updating the ~~city code~~ Vancouver Municipal Code to increase housing density and types.

Alternative 2

Level of Supply, Diversity, and Potential Cost of Housing

Alternative 2 would result in the greatest potential diversity of housing types of all the alternatives because it would have the highest capacity for new housing units and would designate the most land area as Medium-Scale Neighborhoods, Mixed-Use Neighborhoods, and Regional Activity Centers. As with Alternative 1 and the Preferred Alternative, East Vancouver (between I-205 and the eastern City limits) would have the greatest capacity for new housing units.

Alternative 2 would have the highest potential for increasing the housing market supply and thus potentially lowering the cost of housing because it would have the largest amount of land zoned for denser housing types. Residents, developers, and homebuilders would receive the benefits of the proposed zoning code update, which is designed to make requirements easier and simpler to understand, and in turn to reduce costs and barriers to housing production.

New Housing with High Displacement Risk

Alternative 2 would have a higher capacity for new housing units in areas identified as high displacement risk than Alternative 1 but a lower capacity than the No Action Alternative and the Preferred Alternative, as shown in Table 9.

Amount of New Housing in Connected and Accessible Neighborhoods

Alternative 2 would have more capacity for new housing units in connected and accessible neighborhoods than the No Action Alternative, ~~and~~ Alternative 1 and the Preferred Alternative, as shown in Table 10. Areas with capacity for new housing outside of connected and accessible neighborhoods would be in similar areas of Central and East Vancouver as Alternative 1 and the Preferred Alternative. Unlike Alternative 1 but similar to the Preferred

Alternative, there would be capacity for new housing units near I-205 and NE Padden Parkway, at the north end of Central Vancouver, where there is lower existing access to services. ~~However,~~ S~~s~~imilar to Alternative 1 and the Preferred Alternative, the new zoning districts included in Alternative 2 would support a variety of uses, which could support more commercial or retail services and amenities in areas traditionally dominated by residential development.

Level of Housing Capacity for All Income Bands

Alternative 2 would have the highest potential for housing capacity for all income bands of the alternatives because it would have the highest capacity for new housing units in general. As with Alternative 1 and the Preferred Alternative, the new zoning designations and associated development regulations under Alternative 2 would allow for a greater diversity of housing types than the No Action Alternative. There would be more areas of the ~~c~~City that allow for a greater variety of housing types under Alternative 2 than Alternative 1 and the Preferred Alternative.

Compatibility with Housing Plans and Policies

Like Alternative 1 and the Preferred Alternative, Alternative 2 would be compatible with the City's housing plans and policies because its proposed land use and zoning designations would provide sufficient capacity to exceed the City's minimum 2045 housing targets and would align with the Housing Action Plan, which includes strategies such as updating the ~~city code~~ Vancouver Municipal Code to increase housing density and types.

Preferred Alternative

Level of Supply, Diversity, and Potential Cost of Housing

The Preferred Alternative would result in a greater potential diversity of housing types than the No Action Alternative. Based on market feasibility and redevelopment potential (see Appendix B for more information), it would have a greater capacity for new housing units citywide and would designate more land area as Medium-Scale Neighborhoods, Mixed-Use Neighborhoods, and Regional Activity Centers compared to the No Action Alternative. These denser zoning districts allow for a broader range of housing typologies with more units. East Vancouver (between I-205 and the eastern City limits) would have the greatest capacity for new housing units.

The Preferred Alternative would also have a greater potential for meeting affordable housing needs than the No Action Alternative, because of the greater capacity for new housing units and more allowances for smaller housing types. Residents, developers, and homebuilders would receive the benefits of the proposed zoning code update, which is designed to make requirements easier and simpler to understand, and in turn to reduce costs and barriers to housing production.

The effects of the Preferred Alternative on the level of supply, diversity and potential cost of housing would be most similar to Alternative 1 because both would have a similar capacity for new housing units.

New Housing with High Displacement Risk

The Preferred Alternative would have a higher capacity for new housing units in areas identified as high displacement risk than Alternatives 1 and 2 but a lower capacity than the No Action Alternative, as shown in Table 9.

Amount of New Housing in Connected and Accessible Neighborhoods

The Preferred Alternative would have more capacity for new housing units in connected and accessible neighborhoods than the No Action Alternative and Alternative 1, and similar capacity compared with Alternative 2, as shown in Table 10. Similar to Alternatives 1 and 2, the Preferred Alternative would have capacity for new housing outside of connected and accessible neighborhoods in similar areas of Central and East Vancouver. Similar to Alternative 2, there would be capacity for new housing units near I-205 and NE Padden Parkway, at the north end of Central Vancouver, where there is lower existing access to services. Similar to Alternatives 1 and 2, the new zoning districts included in the Preferred Alternative would support a variety of uses, which could support more commercial or retail services and amenities in areas traditionally dominated by residential development.

Level of Housing Capacity for All Income Bands

The Preferred Alternative would have higher levels of housing capacity for all income bands than the No Action Alternative because it would have a much higher capacity for new housing units in general. The new zoning designations and associated development regulations under the Preferred Alternative would allow for a greater diversity of housing types than the No Action Alternative. The Preferred Alternative would include the Manufactured Home Park zone, which intends to preserve existing affordable manufactured home park developments and prevent displacement. The effects of the Preferred Alternative on the level of housing capacity for all income bands would be most similar to Alternative 1 because both would have a similar capacity for new housing units. The Housing Needs and Land Capacity Analysis demonstrates Vancouver's capacity within the Preferred Alternative to meet the housing need by income band using either the HAPT tool or the County allocation methodology (ECONorthwest 2026).

Compatibility with Housing Plans and Policies

Like Alternatives 1 and 2, the Preferred Alternative would be compatible with the City's housing plans and policies because its proposed land use and zoning designations would provide sufficient capacity to meet and exceed the City's minimum 2045 housing targets and

would align with the Housing Action Plan and underlying housing access goals, which includes strategies such as updating the City code to increase housing density and types.

Avoidance, Minimization, and Mitigation Measures

Housing development under the No Action Alternative would be subject to applicable state and county laws and the City's Land Use and Development Code (VMC Title 20).

The action alternatives would be subject to the City's proposed Comprehensive Plan Update Land Use and Development chapter goals and policies and proposed revisions to VMC Title 20 with new development and zoning code for the implementing base land use districts. The City is also working to develop and enact additional policies and actions designed to reduce costs and burdens for new housing development and to support a variety of housing types.

Implementation of the following proposed goals and policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would help to avoid, minimize, and mitigate potential housing impacts identified for the action alternatives:

- Add a minimum of 38,~~000~~ 129 new housing units by 2045.
- Provide a wide range of new housing types to fit a variety of household sizes, cultures, incomes, abilities, and stages of life. Increase housing diversity by allowing a range of missing middle housing types (duplexes, triplexes, townhomes, cottage clusters, and courtyard apartments) in low- and medium-intensity residential areas to expand affordability and accessibility. Incentivize development of housing types suitable for multigenerational living.
- Work with partners to facilitate and fund housing that reflects the cultures, identities and needs of Vancouver's unique population groups.
- Provide adequate transitional, permanently supportive, and affordable housing so that all residents have access to safe and stable housing. Expand the availability of permanently supportive housing and emergency shelter beds with integrated services for people with disabilities, houseless individuals, and at-risk populations.
- Work to prevent displacement of community members due to direct impacts and market forces by providing resources to support stable and secure housing. Implement anti-displacement strategies and actions that protect residents and businesses in advance of public investment so communities can remain in place and benefit from improvements. Analyze and mitigate for displacement pressures and risks prior to making large scale public investments.
- Provide connected and accessible neighborhoods with a diverse mix of community and open spaces, services, retail, fresh food, healthcare, and educational opportunities within

15 minutes (0.25 mile) or less of housing. Site new accessible and attainable housing close to existing and future parks.

- Enable homeownership for people across the income spectrum. Broaden access to homeownership in the community for first-time owners, low-income residents, and other groups frequently priced out of homeownership through alternative ownership methods.

Provide access to affordable housing regardless of income. Preserve the most affordable and accessible housing options in the ~~c~~City and discourage conversion to more expensive housing or commercial uses. Develop incentives to integrate below-market housing as part of new market-rate housing projects.

- Facilitate homeownership opportunities through assistance programs, grants, and other methods that reduce barriers to entry for low- and moderate-income households.
- Explore and develop additional funding methods and resources to support affordable housing and community ownership opportunities.
- Facilitate development of income-based housing in connected and accessible neighborhoods, and ~~generally~~ in areas with ~~good~~ access to transit, resources and services.
- Develop mechanisms to integrate community benefits into private development that requires discretionary land use review and City-led redevelopment projects.
- Pursue strategic acquisition and utilize existing City-owned land for affordable housing.
- Simplify the development review process where feasible and as needed to reduce housing ~~costs~~ permitting timelines and improve housing costs.
- Promote and remove regulatory barriers to new and innovative construction methods such as modular, panelized, 3d printed, or other methods.
- Develop incentives to integrate below market housing as part of new market rate housing projects.
- Provide financial support to help at-risk households remain in their homes, preventing eviction and displacement.
- Explore models and opportunities for existing residences and businesses to have voluntary right of first refusal to purchase qualifying properties when sold or build an equity stake in the property over time.

Significant Unavoidable Adverse Impacts

The No Action Alternative would have significant adverse impacts on housing because it would not provide sufficient capacity for development to meet the City's minimum 2045 housing targets, and would not comply with state housing requirements of the GMA.

The anticipated changes under the action alternatives would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant

unavoidable adverse impacts to housing are anticipated for Alternative 1 or Alternative 2 or the Preferred Alternative.

Aesthetics

Methodology

Aesthetics refers to the scale and visual quality of the study area, including building heights, views, shading conditions, and overall visual and architectural character. Analysts reviewed relevant information and policies about the city's existing urban form and character, viewsheds, shadows, and light and glare, including the following sources:

- Vancouver Municipal Code:
    - Existing VMC 20.925, Landscaping
    - Existing VMC 20.935, Off-site Impacts,
    - VMC 20.770, Tree, Vegetation, and Soil Conservation
    - VMC 20.500, Overlay Districts
    - VMC 20.600, Plan Districts
- Design guidelines and manuals for subareas and districts
- City of Vancouver Shoreline Master Program (City of Vancouver 2021b)

Analysts reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Compatibility with desired urban form and character as expressed in existing and future planning documents
- Level of general visual impacts (e.g., shadows, light, and glare)

Any analysis of aesthetic impacts is inherently subjective and can vary based on individual preferences. This analysis is based on assumptions that increased growth and density can lead to additional larger or taller buildings that cast longer shadows and have the potential to add to light and glare impacts.

Affected Environment

Existing Urban Form and Character

Existing urban form and character vary by location in Vancouver. Western areas of the ~~e~~City generally have older buildings, smaller lots with denser uses, and a more walkable environment with a traditional grid-patterned street network. This area also has a large industrial center, which includes the Port of Vancouver, along the Columbia River west of the

Vancouver Waterfront. Key corridors and sites include Mill Plain Boulevard/SR 501, downtown (see ~~Figure 14~~ ~~Figure 14~~ Figure 16), the waterfront, and Vancouver Lake.

~~Figure 14~~ Figure 16. Downtown Vancouver



Source: City of Vancouver

Central Vancouver has a more suburban character than the western areas, including postwar subdivisions and older big-box retail developments. Key corridors and sites include Fourth Plain (see ~~Figure 15~~ ~~Figure 15~~ Figure 17), Evergreen and Grand Boulevards, Fort Vancouver, Clark College, and The Heights Subarea.

~~Figure 15~~ Figure 17. East Fourth Plain Boulevard



Source: City of Vancouver

East Vancouver has the most suburban character and urban form, with newer residential and big-box retail developments. Key corridors and sites include Mill Plain Boulevard and SE 164th Avenue, as shown in ~~Figure 16~~ ~~Figure 16~~ Figure 18.

~~Figure 16~~ Figure 18. Aerial View of SE 164th Avenue and Mill Plain Boulevard Vicinity



Source: City of Vancouver

Vancouver's landscape reflects efforts to preserve existing trees and other vegetation and to add new vegetation (City of Vancouver 2021). Historic trees in the City help preserve its character and are identified and protected as "heritage trees" in VMC 20.770. VMC 20.925 outlines landscaping requirements for all new or substantially remodeled buildings, accessory uses, and parking lots for multiple reasons, including aesthetic value.

The Our Vancouver Goals Framework identifies harmony between the built and natural environment as a desired community outcome (City of Vancouver 2023b).

In addition to these citywide regulations and policies, many subareas and districts within the ~~e~~City are guided by design guidelines that have been adopted to guide housing type and character specifically in those areas.

Viewsheds

Most of Vancouver today is dominated by views of the built environment, including existing commercial and residential areas. Vancouver is situated in a natural landscape that is characteristic of the Pacific Northwest region of the United States, with rivers, creeks and lakes, and urban forests. Views of Mt. St. Helens, Mt. Adams, and Mt. Hood are also available

from certain corridors and locations within the city, with one example shown in ~~Figure 17~~ ~~Figure 17~~ Figure 19.

~~Figure 17~~ Figure 19. Views of Mt. Hood at Vancouver Lake



Source: City of Vancouver

Views of the Columbia River are available in some areas of the city, including the Vancouver Waterfront and various businesses and homes along the shoreline. The City's SMP identifies goals and policies around views and aesthetics "to assure that the public's opportunity to enjoy the physical and aesthetic qualities of shorelines of the state, including views of the water, is protected to the greatest extent feasible" (City of Vancouver 2021). The SMP restricts new or expanded buildings that would obstruct the views of a substantial number of residences on areas adjacent to shorelines unless "overriding considerations of the public interest will be served."

Shadows

Shadows refer to the blockage of direct sunlight falling on a given area. Some land uses are more sensitive to shading than others, where access to periods of direct sunlight is important for their primary function. Examples include parks and outdoor recreational facilities, community gardens, and buildings that rely on solar power panels.

Shadows in the ~~e~~City are typically influenced by building heights and sizes, which are regulated by the zoning code and vary by zone. Downtown Vancouver, the waterfront, and other mixed-use and commercial zones typically have taller buildings that cast longer

shadows. Lower-density neighborhoods with shorter buildings have fewer building-shaded areas.

Light and Glare

Light and glare impacts tend to be concentrated in higher-density areas with more street lights, reflective surfaces, and vehicle traffic, compared to lower-density areas. VMC 20.935.030(D) provides limitations for off-site impacts from light and glare that apply to any development, redevelopment, or use of a property in the City, both during and after construction.

Light pollution refers to the alteration of outdoor light levels from those occurring naturally, and can affect our ability to see the night sky. Light pollution is caused by outdoor lights from various sources that remain on (or are on periodically) between sunset and sunrise. Examples include streetlights, exterior lights on buildings, and headlights from vehicles. Light pollution in Vancouver is greater closer to Portland and gradually reduces over distance (Radiance Light Trends 2024).

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following aesthetics-related metrics:

- Compatibility with desired urban form and character as expressed in existing and future planning documents
- Level of general visual impacts (e.g., shadows, light and glare)

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Compatibility with Urban Form and Character

All of the alternatives would allow development of new housing units and other structures throughout the city, which has the potential to directly affect aesthetics in the surrounding areas. Existing and planned regulations and policies aimed at protecting views and reducing the effects of light and glare would apply to all alternatives and would help facilitate compatibility with area-specific urban form and character in a changing environment.

Level of General Visual Impacts

All alternatives would have the potential for impacts to aesthetics through specific future development projects. Future development, regardless of alternative, may alter the visual character of an area and create new sources of shading, light and glare.

All alternatives would have similar amounts of land designated for Hheavy iindustrial, Industrial/Employment, ~~Institutional/Campus,~~ and Parks/Open Space uses. Therefore, impacts to aesthetics, including building heights, views, shading conditions, and overall visual and architectural character, would likely be neutral in these areas.

No Action Alternative

The No Action Alternative assumes the lowest level of citywide growth and development of all the alternatives and no changes to existing land use and zoning designations. Larger-scale buildings and higher building heights would be allowed in fewer areas of the ~~e~~City than under the action alternatives, as detailed in Appendix C. Therefore, it would have the lowest potential for altering the existing visual setting of the ~~e~~City and for introducing new sources of shadow, light, and glare. Development would continue to occur under the existing land use and zoning regulations, as well as state-imposed allowances for new middle housing in single-family neighborhoods, and impacts to aesthetics would likely be modest. Middle housing would also be allowed in single-family neighborhoods under the No Action Alternative, because state law automatically imposes a model ordinance allowing middle housing if local jurisdictions do not take action to allow these housing types. Some aspects of aesthetics would continue to be regulated in the limited select areas that have design guidelines.

Alternative 1

Alternative 1 would allow denser development patterns and larger-scale, taller buildings in more areas of the ~~e~~City compared to the No Action Alternative and in fewer areas of the ~~e~~City compared to Alternative 2.

Because Alternative 1 would have a smaller amount of land area dedicated to Medium-Scale Neighborhood and~~,~~ Mixed Use ~~,and Regional Activity Center~~ zoning districts than Alternative 2, there would be slightly less potential for development of larger-scale buildings that are taller than three stories (45 feet). Alternative 1 would have a similar amount of land dedicated to the Regional Activity Center zoning district as the Preferred Alternative, which would allow for development of larger-scale buildings (no height maximum). ~~However, t~~The proposed zoning code updates would allow for higher maximum building heights in Low-Scale Neighborhoods under ~~both~~ all action alternatives than in equivalent low-density residential zoning districts under the No Action Alternative (45 feet maximum under the action alternatives as compared to 30 feet maximum under the No Action Alternative). These changes could result in localized light, glare, shadow, and other visual impacts if some parcels redevelop to taller building types than their neighboring parcels.

There would be a slightly higher likelihood of redevelopment of existing parking lots, vacant lots and structures under Alternative 1 compared to the No Action Alternative because of the implementation of denser land use designations and zoning in more parts of the city. The light, glare and visual impacts from existing parking lots and vacant lots and structures would be improved by redevelopment of these sites consistent with the new Comprehensive Plan and code.

Alternative 2

Alternative 2 would allow for higher-density zoning districts and larger-scale, taller buildings in the most areas of the ~~c~~City of all the alternatives. Therefore, overall, Alternative 2 would have the highest potential for associated impacts to aesthetic resources, including changes in visual character resulting from taller allowed buildings and new sources of shadows, light and glare.

The amount of land devoted to Regional Activity Center, ~~Campus/Institutional,~~ Medium-Scale Neighborhood~~,~~ and Mixed-Use development would be higher than under Alternative 1 and the Preferred Alternative, which could result in a modestly greater number of taller buildings (75 feet or taller). The increased number of taller, larger-scale buildings would have the potential to result in slightly greater light, glare, shadow, and visual impacts under Alternative 2 compared to Alternative 1, the Preferred Alternative and the No Action Alternative. As with Alternative 1 and the Preferred Alternative, there would also be aesthetic improvements associated with the redevelopment of parking lots and vacant lots and structures.

Preferred Alternative

The Preferred Alternative would allow for higher-density zoning districts and larger-scale, taller buildings in more areas of the City than the No Action Alternative, similar to Alternatives 1 and 2. The Preferred Alternative would have a higher potential for associated impacts to aesthetic resources than the No Action Alternative, including changes in visual character resulting from allowances for taller buildings and new sources of shadows, light and glare.

The amount of land devoted to Institutional/Campus would be the highest under the Preferred Alternative, which would allow for development of taller, larger-scale buildings with a range of commercial and residential uses. Unlike Alternatives 1 and 2, the Preferred Alternative would designate the Section 30 area as Institutional/Campus rather than Mixed Use (Alternative 1) or Regional Activity Center (Alternative 2).

The amount of land devoted to Medium-Scale Neighborhood and Mixed-Use would be similar to Alternative 2, which could result in a modestly greater number of taller buildings (75

feet or taller). This increased number of taller, larger-scale buildings would have the potential to result in slightly greater light, glare, shadow, and visual impacts under the Preferred Alternative compared to Alternative 1 and the No Action Alternative. There would be a similar amount of land dedicated to the Regional Activity Center zoning district as Alternative 1 and slightly less than Alternative 2, which would allow for development of larger-scale buildings (no height maximum). As with Alternatives 1 and 2, there would also be aesthetic improvements associated with the redevelopment of parking lots and vacant lots and structures.

Avoidance, Minimization, and Mitigation Measures

Regardless of alternative, all future development projects will be required to comply with ~~e~~City and state policies for protecting views of the shoreline and reducing off-site impacts, including light and glare. In addition, compliance with ~~e~~City and state requirements for the protection of natural resources, open space, and historic sites would contribute to the preservation of aesthetic resources in the city.

The City's development review process will ensure compliance with current VMC 20.935, carried forward in the proposed new code under VMC 20.450.007, which requires any development, redevelopment, or use of a property to have minimal adverse off-site impacts from light and glare, both during and after construction. The development review process will also ensure compliance with citywide standards for landscaping and tree conservation, as well as any applicable design guidelines or standards that may be in effect at that location.

Development standards included in the proposed form-based zoning and development regulations would also help to avoid, minimize and mitigate impacts to aesthetics. Topics ~~under consideration for~~ included in the code updates include:

- Requirements for minimum open space and maximum impervious areas, building placement and lot build-out (setbacks from property lines), building heights, access points, landscaping (including incentives for maintaining large trees and adding more trees than required), and connectivity.
- Requirements for certain frontage types (i.e., how a building interacts with the street and shapes the overall character of the streetscape), such as awnings, balconies, bay windows, cafés, common yards, courtyards, porches, stoops, and terraces. The City ~~is considering~~ will require form and dimensional requirements for these elements as they relate to the public right-of-way ~~and prohibiting use of exterior materials that could promote glare~~.
- Regulations that provide transitions between zoning districts to ensure compatibility.

Implementation of the following policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential aesthetics impacts identified for the action alternatives:

- Ensure medium- to high-scale residential, mixed-use, and commercial development is human-scale, street-oriented, and integrated with surroundings to enhance comfort, accessibility, and visual interest for people walking, biking, or rolling.
- Develop standards for public spaces and buildings that incorporate culturally specific design principles and art installations and reflect the diverse history and heritage of Vancouver communities.

Significant Unavoidable Adverse Impacts

All alternatives have the potential to create impacts to aesthetics as a result of new development patterns and building forms. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to aesthetics are anticipated for any of the alternatives.

Historic and Cultural Preservation

Methodology

Analysts reviewed relevant information and policies about citywide historic and archaeological resources, including the following sources:

- National Register of Historic Places (NRHP)
- RCW Chapter 27.34, State Historical Societies – Historic Preservation
- RCW Chapter 27.44, Indian Graves and Records
- RCW Chapter 27.48, Preservation of Historical Materials
- RCW Chapter 27.53, Archeological sites and resources
- Washington State Heritage Register (WSHR)
- VMC Chapter 17.39, Historic Preservation
- VMC Chapter 20.710, Archaeological Resource Protection
- VMC Chapter 20.770.120, Heritage Trees
- Community Atlas (Design Workshop 2024)

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Level of potential impacts to historic sites
- Level of risk of uncovering archaeological resources at proposed development sites

Affected Environment

Historic Sites

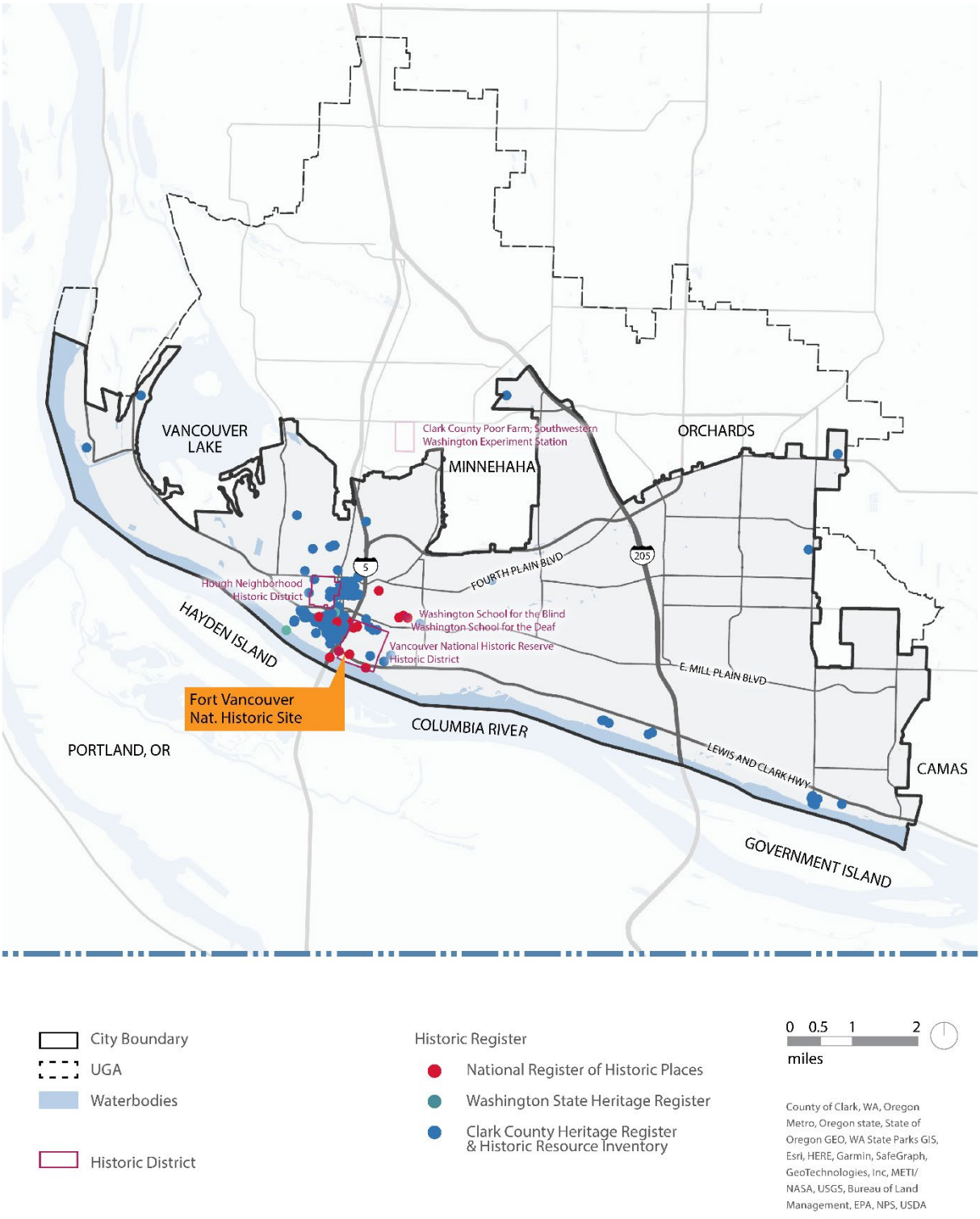
VMC 17.39 applies to properties in Vancouver and includes eligibility criteria for historic and cultural resources in Clark County, in addition to the NRHP and WSHR. Many historic sites and buildings have been revitalized to preserve their unique architectural characteristics and embrace Vancouver's history. The City is commonly recognized for its historic site, Fort Vancouver, which served as a major trading post in the 19th century and an Army post during World War II.

~~Figure 18~~ ~~Figure 18~~ Figure 20 shows a map of sites in Vancouver that are listed on the NRHP, WSHR, or Clark County Heritage Register and Historic Property Inventory, and Table 11 lists NRHP sites in Vancouver. These historic sites are primarily clustered just west and east of I-5 in West and Central Vancouver, near downtown. A few county historic sites are designated along the Columbia River and at the far eastern and western edges of the city limits.

Vancouver has two designated federal and/or state historic districts:

- In West Vancouver, the Hough Neighborhood Historic District, located west of Vancouver's central business district, has been listed on the Washington Heritage Register since 2003 (Clark County 2024a). It hosts a variety of architectural styles and buildings constructed primarily between circa 1890 and 1945 and is the largest collection of existing pre-World War II housing in Vancouver.
- In Central Vancouver, the Vancouver National Historic Reserve Historic District, bounded by Evergreen Boulevard on the north, I-5 on the west, the Columbia River on the south and East Reserve Street on the east, covers about 252 acres of the 366-acre Historic Reserve created by Congress in 1996 (Clark County 2024b). It includes several nationally significant sites that contribute to its status on the NRHP, including Fort Vancouver National Historic Site, the Officer's Row National Historic District, the Vancouver Barracks National Historic District, Pearson Air Museum, the Jack Murdock Aviation Center, Pearson Airfield, Old Apple Tree Park, and Waterfront Park.

~~Figure 18~~ Figure 20. Federal, State, and County Historic Sites



Source: Design Workshop 2024

Table 11. National Register of Historic Places Sites in Vancouver

National Register of Historic Places Sites, Vancouver
Anderson-Beletski Prune Farm
Chumasero-Smith House
Clark County Courthouse
Clark County Poor Farm - Southwestern Washington Experiment Station
Covington House
Elks Building
Evergreen Hotel
Fort Vancouver National Site • Pearson Air Museum • Fort Vancouver Visitor center • Japanese Castaways' Memorial
Hidden Houses
House of Providence
John P. and Mary Kiggins House
Kiggins Theater
Luepke Florist
Heye H. and Eva Meyer Farmstead
Officers Row, Fort Vancouver Barracks (21 Houses) • Ulysses S. Grant House • General O.O Howard House • George C. Marshall House • The Marshall House Vancouver Barracks Post Hospital
Slocum House

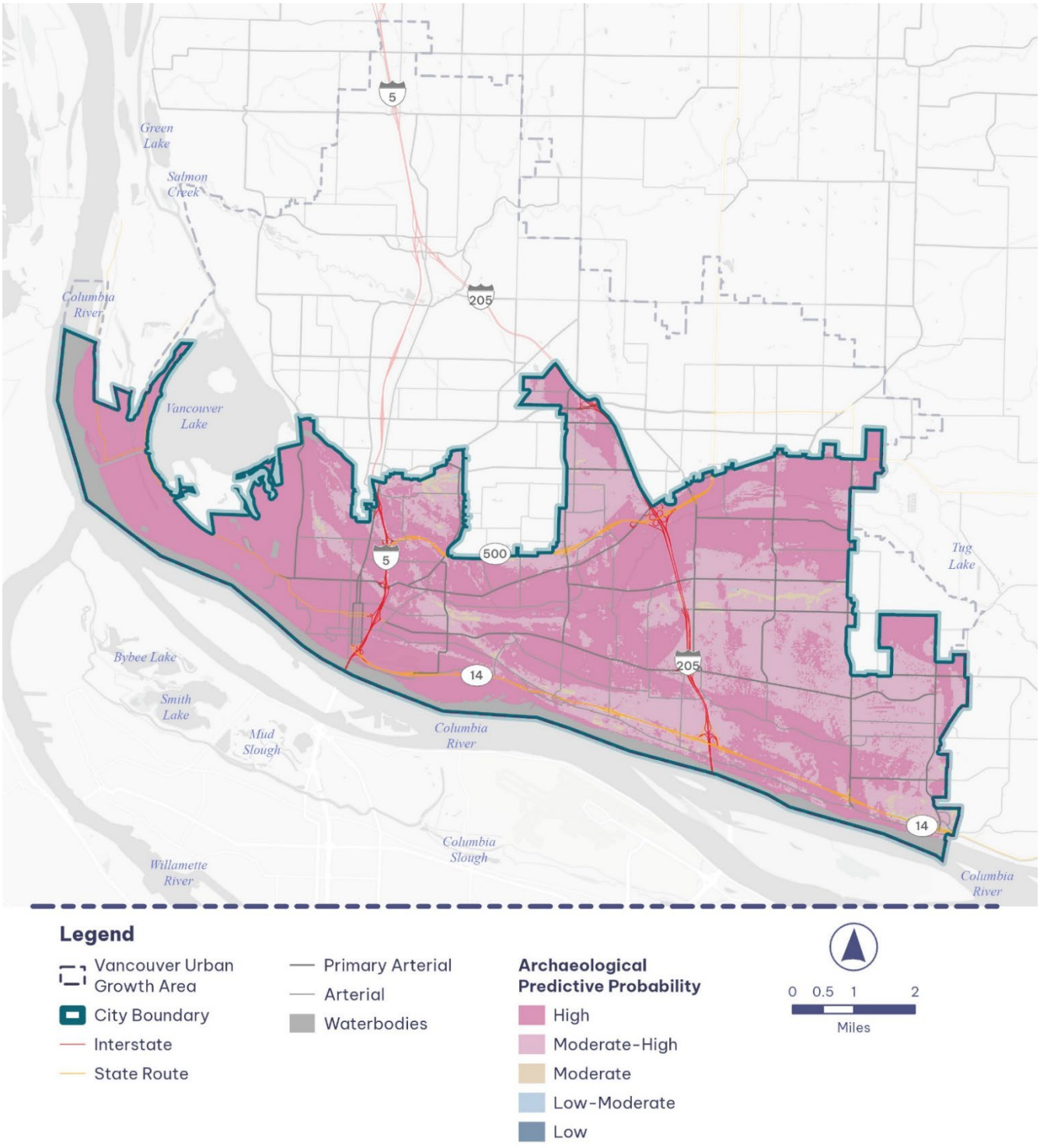
National Register of Historic Places Sites, Vancouver
John Stanger House
U.S. National Bank Building
U.S. Post Office - Vancouver Main
Vancouver National Historic Reserve Historic District
Vancouver Public Library
Vancouver Telephone Building
Vancouver-Portland Bridge
Vancouver Washington School for the Blind
McLoughlin House
Slocum House
John Stanger House

Source: Design Workshop 2024

Archaeological Resources

~~Figure 19~~ ~~Figure 19~~ Figure 21 shows the probability of encountering archaeological resources throughout the ~~e~~City based on data from the state's predictive model. Most of the city's perimeter, including sites along Vancouver Lake and the Columbia River, is identified as having a higher probability of having archaeological significance. Central and East Vancouver north and south of Fourth Plain Boulevard and SR 500 are also identified as higher probability areas.

~~Figure 19~~ Figure 21. Archaeological Predictive Risk Probability Map



Source: Clark County n.d.

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following historic and cultural preservation-related metrics:

- Level of potential impacts to historic sites
- Level of risk of uncovering archaeological resources at proposed development sites

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Level of Potential Impacts to Historic Sites

All alternatives could potentially lead to redevelopment projects that would demolish, physically alter, or change the setting of existing historic properties. They could also potentially introduce new elements into culturally or historically significant viewsheds of historic properties.

West Vancouver, particularly downtown, would have the highest potential for impacts to historic sites under all of the alternatives because it has the largest concentration of identified historic properties in the city, as well as the state-designated Hough Neighborhood Historic District (see ~~Figure 18~~ ~~Figure 18~~ Figure 20).

Central Vancouver would have capacity for more projected new housing units and jobs relative to West Vancouver but fewer than East Vancouver. It has fewer identified historic sites than West Vancouver but more than East Vancouver, so it would have moderate potential for impacts to these properties. Although the associated zoning designations would change under the action alternatives, it is assumed that no new development would occur within the Vancouver National Historic Reserve Historic District under any of the alternatives.

East Vancouver would have capacity for the most projected new housing units and jobs and also has the fewest identified historic sites. It would therefore have the lowest potential for impacts to historic sites under all of the alternatives.

The City's identified need to meet future minimum housing and jobs targets, regardless of alternative, could result in increased pressure to redevelop sites that have historic buildings or potential cultural or archaeological resources; however, this would be less of an issue in East and Central Vancouver under all alternatives based on the locations of identified historic sites.

Level of Risk of Uncovering Archaeological Resources at Proposed Development Sites

All alternatives could potentially lead to redevelopment projects that could uncover archaeological resources during construction. Risks of encountering archaeological resources would be highest along most of the city's perimeter, including sites along the Columbia River and Vancouver Lake, and in Central and East Vancouver north and south of Fourth Plain Boulevard and SR 500.

Because land use and zoning designations would remain similar for sites along the Columbia River and Vancouver Lake under all of the alternatives, potential impacts to archaeological resources are also expected to be similar.

No Action Alternative

In general, there would be minimal additional impacts under the No Action Alternative aside from those described in the Impacts Common to All Alternatives section. The No Action Alternative would allow for the lowest level of citywide growth and redevelopment of all the alternatives. Therefore, it would likely have the lowest potential for individual site disturbance and potential associated impacts to cultural, archaeological, and historic resources. However, the No Action Alternative would encourage continuation of a less dense, more dispersed style of urban development. In the longer term, this type of development pattern could potentially increase pressure to develop more individual sites, which could result in additional cumulative impacts to historic and cultural preservation over time.

Alternative 1

In general, there would be minimal additional impacts under Alternative 1 aside from those described in the Impacts Common to All Alternatives section. Due to the amount of land zoned for Medium Scale Neighborhood, Mixed Use, and Regional Activity Center, Alternative 1 would allow for more intense levels of citywide development compared to the No Action Alternative and lower levels compared to Alternative 2 and the Preferred Alternative ~~and lower levels compared to Alternative 2~~. Higher-density development would be allowed in fewer areas of the ~~c~~City than in Alternative 2 and the Preferred Alternative, as discussed in the Land and Shoreline Use section. Overall, more sites would have the potential for disturbance and associated impacts to cultural, archaeological, and historic resources under Alternative 1 than the No Action Alternative and fewer sites would experience these impacts under Alternative 2.

In West Vancouver, the Hough neighborhood, a designated historic district, would be designated as Medium-Scale Neighborhood under ~~both~~ the action alternatives, which would create potential pressure to redevelop historic properties into denser housing types and allow a greater mix of land uses in the area. Although the Hough neighborhood already

contains multifamily housing units, the medium-scale buildings allowed in this new zoning district could have impacts on neighboring historic properties if they resulted in changes to their setting. However, West Vancouver is also identified as having the lowest capacity for new housing units based on market feasibility and redevelopment studies compared to Central and East Vancouver under Alternative 1, as discussed in the Land and Shoreline Use section.

In Central and East Vancouver, there would be greater potential risk of encountering archaeological resources under Alternative 1 than the No Action Alternative because Alternative 1 would allow for higher-density development in higher probability areas north and south of Fourth Plain Boulevard and SR 500.

Overall, because Alternative 1 would allow for denser development patterns than the No Action Alternative, it would potentially result in less pressure to develop individual historic sites than the No Action Alternative, which could lead to fewer cumulative impacts on historic and cultural preservation over time.

Alternative 2

In general, there would be minimal additional impacts under Alternative 2 aside from those described in the Impacts Common to All Alternatives section. Alternative 2 would allow for the highest intensity of citywide development of all the alternatives, and there would be more areas designated for potential high-density development than under Alternative 1 and the Preferred Alternative.

Similar to Alternative 1 and the Preferred Alternative, Alternative 2 has the potential to create pressure to redevelop historic properties in the Hough neighborhood in West Vancouver into denser housing types as allowed in the Medium-Scale Neighborhood zoning district.

In Central ~~and East~~ Vancouver, there would be a greater potential risk of encountering archaeological resources under Alternative 2 than the No Action Alternative and Alternative 1, but about the same as the Preferred Alternative because of proposed higher-density and intensity development (Medium Scale Neighborhood, Mixed Use, Regional Activity Center) in higher probability areas north and south of Fourth Plain Boulevard and SR 500.

In East Vancouver, Alternative 2 would have the greatest potential risk of encountering archaeological resources because it would have the largest amount of land zoned for Medium Scale Neighborhood, Mixed Use and Regional Activity Center, which allow for taller buildings and may require more excavation.

Overall, Alternative 2 would have the highest potential for site disturbance and associated impacts to cultural, archaeological, and historic resources at individual sites because of the higher levels of potential disturbance to existing land and buildings to accommodate new, denser development. However, because Alternative 2 would allow for the densest development patterns, it would potentially result in less pressure to develop historic sites than the No Action Alternative, ~~and~~ Alternative 1, and the Preferred Alternative, which could lead to fewer cumulative impacts on historic and cultural preservation over time.

Preferred Alternative

In general, there would be minimal additional impacts under the Preferred Alternative aside from those described in the Impacts Common to All Alternatives Section. The Preferred Alternative would allow for a higher intensity of citywide development than the No Action Alternative, similar to Alternatives 1 and 2. There would be more areas designated for potential high-density development than under Alternative 1 and slightly fewer of these areas than under Alternative 2.

Similar to Alternatives 1 and 2, the Preferred Alternative would have the potential to create pressure to redevelop historic properties in the Hough neighborhood in West Vancouver into the denser housing types allowed in the Medium-Scale Neighborhood zoning district.

In Central Vancouver, there would be a greater potential risk of encountering archaeological resources under the Preferred Alternative than the No Action Alternative and Alternative 1 and about the same amount of risk compared to Alternative 2 because of proposed higher-density and intensity development in higher probability areas north and south of Fourth Plain Boulevard and SR 500.

In East Vancouver, the Preferred Alternative would have a greater potential risk of encountering archaeological resources compared to Alternative 1, but less risk than Alternative 2 because there would be less land zoned for Medium Scale Neighborhood, Mixed Use and Regional Activity Center.

Overall, the Preferred Alternative would have a higher potential for site disturbance and associated impacts to cultural, archaeological, and historic resources at individual sites because of the higher levels of potential disturbance to existing land and buildings to accommodate new, denser development. However, because the Preferred Alternative would allow for denser development patterns in more areas of the city, similar to Alternative 2, it would potentially result in less pressure to develop historic sites than the No Action Alternative, which could lead to fewer cumulative impacts on historic and cultural preservation over time.

Avoidance, Minimization, and Mitigation Measures

Regardless of the alternative, all future development projects will be required to comply with ~~e~~City and state requirements for identification and preservation of cultural, archaeological, and historic resources.

The City's development review process will ensure compliance with VMC 20.710, which requires an archaeological study (or predetermination): (1) when any part of the area to be disturbed is in an area with a high probability for archaeological resources, (2) when the development is 5 acres or more in size and wholly within an area with moderate-high and moderate probability for archaeological resources, (3) when any land to be disturbed, regardless of size or predictive model probability level, is within 0.25 mile of a recorded archaeological site. All areas that have not been previously included in an archaeological study are recommended for a predetermination-level study.

In addition, implementation of the following goals and policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential impacts to historic and cultural preservation identified for the action alternatives:

- Support a thriving cultural landscape for residents and visitors by investing in public art, cultural centers and facilities, historic preservation, and supporting community-centered initiatives and opportunities for creative expression that reflect the city's diverse identities and historic roots.
- Develop standards for public spaces and buildings that incorporate culturally specific design principles and art installations and reflect the diverse history and heritage of Vancouver communities.
- Foster meaningful partnerships with tribal communities and land stewards, integrating their knowledge, priorities, and cultural perspectives into local decision-making processes.
- Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design, and programming of community spaces.
- Protect and preserve significant cultural, historic, archaeologic, and ecologic community resources. Promote preservation, restoration, and rehabilitation of historic and architecturally significant structures.
- Improve access to arts, cultural, and heritage programs by reducing barriers to participation, prioritizing underserved and historically marginalized communities, and investing in related programs.
- Strengthen Vancouver's cultural sector by investing in capacity building across arts, culture and heritage organizations as an economic and cultural driver of the community.

- Protect and promote Fort Vancouver and the Historic Reserve as nationally significant cultural and historic assets. Support public investment, inclusive programming, and heritage-based economic development. Oppose efforts to reduce funding or public accessibility.
- Ensure publicly funded art projects and installations reflect and incorporate the experiences of historically excluded and underrepresented voices in the physical and cultural landscape of the City.

Significant Unavoidable Adverse Impacts

All alternatives have the potential to create impacts to historic and cultural preservation as a result of expected population and job growth and development. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to historic and cultural preservation are anticipated for any of the alternatives.

Transportation

Methodology

Analysts reviewed relevant information and policies to qualitatively describe existing citywide conditions for vehicular, active, water, rail, and airborne transportation, as well as parking and safety conditions, including the following sources:

- Clark County Regional Transportation Plan (RTC 2024)
- City of Vancouver Transportation System Plan (TSP) 2024-2044 (City of Vancouver 2024a)
- C-TRAN 2025~~1-2026~~ 2030 Transit Development Plan (C-TRAN ~~2021~~2025)
- Community Atlas: Existing Conditions Report (Design Workshop 2024)
- Southwest Washington Regional Transportation Council (RTC) regional travel demand model outputs (RTC 2025, 2026)

In coordination with the City, RTC refined and ran the regional travel demand model for the alternatives described in Chapter 2 to estimate transportation conditions in 2045 (RTC 2025, 2026). The model used 2023 households and jobs data to represent existing conditions for consistency with the baseline year for the Comprehensive Plan Update and to be consistent with other jurisdictions in Clark County. Using the outputs from the model, analysts reviewed the alternatives and determined potential adverse impacts and associated mitigation measures for the following performance metrics:

- Vehicle miles traveled (VMT)
- Level of mode shift

- Mobility units by transportation analysis districts
- Potential for increases in fatal/severe crashes

Affected Environment

Vehicular Transportation

Vancouver's street network consists of highways, arterials, and collectors, as shown in ~~Figure 20~~ ~~Figure 20~~ Figure 22. Few streets connect directly across the ~~c~~City (City of Vancouver 2024a). Interstate 5 (I-5) runs north–south through Western-Central Vancouver and provides connectivity to nearby Portland, Oregon, as well as the whole West Coast. Interstate 205 (I-205) serves as a bypass for I-5, running north–south and terminating in Salmon Creek, WA at the north end and in Tualatin, Oregon at the south end.

State Route (SR) 14 runs east–west, starting at I-5 in Vancouver, running through the Columbia River Gorge, and ending at I-82/US 395 in Plymouth, Washington. SR 14 is a key connector to Camas and Washougal, located east of Vancouver. SR 500 is an auxiliary route of I-5, running east–west and connecting I-5 to I-205.

The city's arterial network, including Mill Plain Boulevard, 112th Avenue, and Andresen Road, has major destinations, transit service, higher speed limits, wider roadways, and the greatest number of crashes.

The City's transportation system is guided by the TSP, which provides policy direction on transportation infrastructure investments in the City and considers regional transportation needs (City of Vancouver 2024a). The 2024-2044 TSP proposes a framework for future transportation investment intended to reduce car dependency and improve mobility and safety for all, regardless of age, ability or travel mode.

While the 2024 TSP largely focuses on working within the existing roadway system to expand safe transportation options for all users, the City also plans to invest in upgrading and building out the primary arterial roadway system. These large-scale capital projects are designed to bring major roadways up to urban standards; add turn lanes, mobility lanes (a renaming of "bike lanes" to account for their use by bikes, e-bikes, and other small mobility devices such as scooters) and sidewalks; improve safety; and reduce congestion by accommodating recent and future developments along arterial streets.

Table 12 shows modeled existing citywide daily VMT, and Table 13 shows modeled existing mode split.

Safety

From 2010 to 2019, the number of crashes in the City increased 29% while the population grew by 13%. During the pandemic, crashes declined 5% from 2019 to 2022 (City of Vancouver 2024a).

The TSP found that long distances between crossings, lack of sidewalks on nine miles of arterial streets, and bicycling and small mobility facilities that end abruptly contribute to feelings of unsafe conditions. Distraction and inattention make up the top two factors contributing to crashes across all crash types. ~~Figure 21~~ ~~Figure 21~~ Figure 23 provides a map of collisions by type in 2020.

Freight

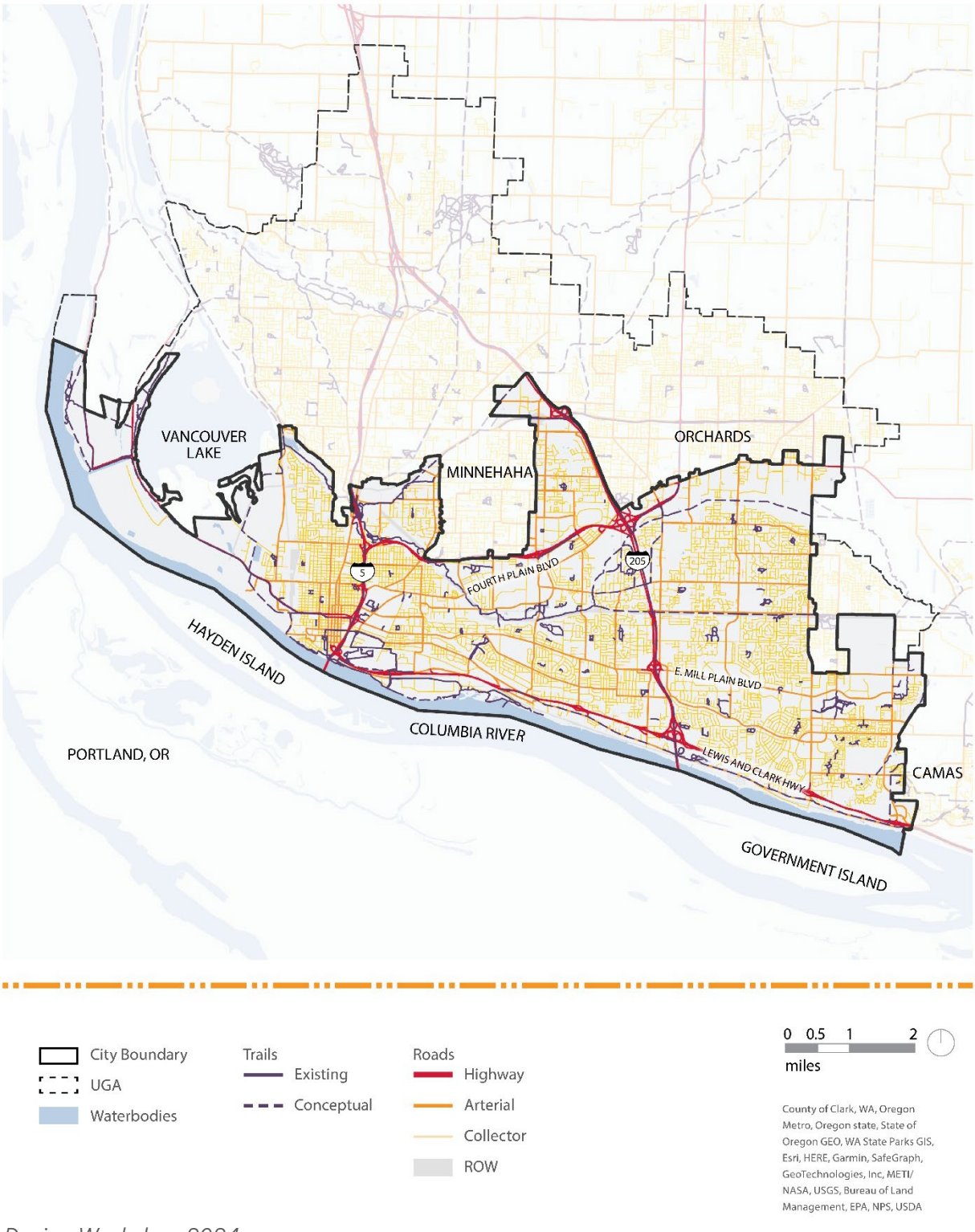
Freight is critical to the City's economy (City of Vancouver 2024a). The City works to integrate design and policy treatments so freight and vulnerable users can navigate the same streets.

The 2024 TSP calls for development of a freight network classification that designates where freight movements are expected and planned to occur. The City uses freight categories that align with state, regional, and national designations, including:

- Critical corridors. These are important for through truck traffic to maintain mobility for regional or national connections. Within this category, the two subcategories are (1) National Highway Freight Network, and (2) Truck Freight Economic Corridors.
- Freight access streets. Trucks must use streets throughout the ~~e~~City for deliveries. The freight network recognizes these local-access streets based on actual truck usage.

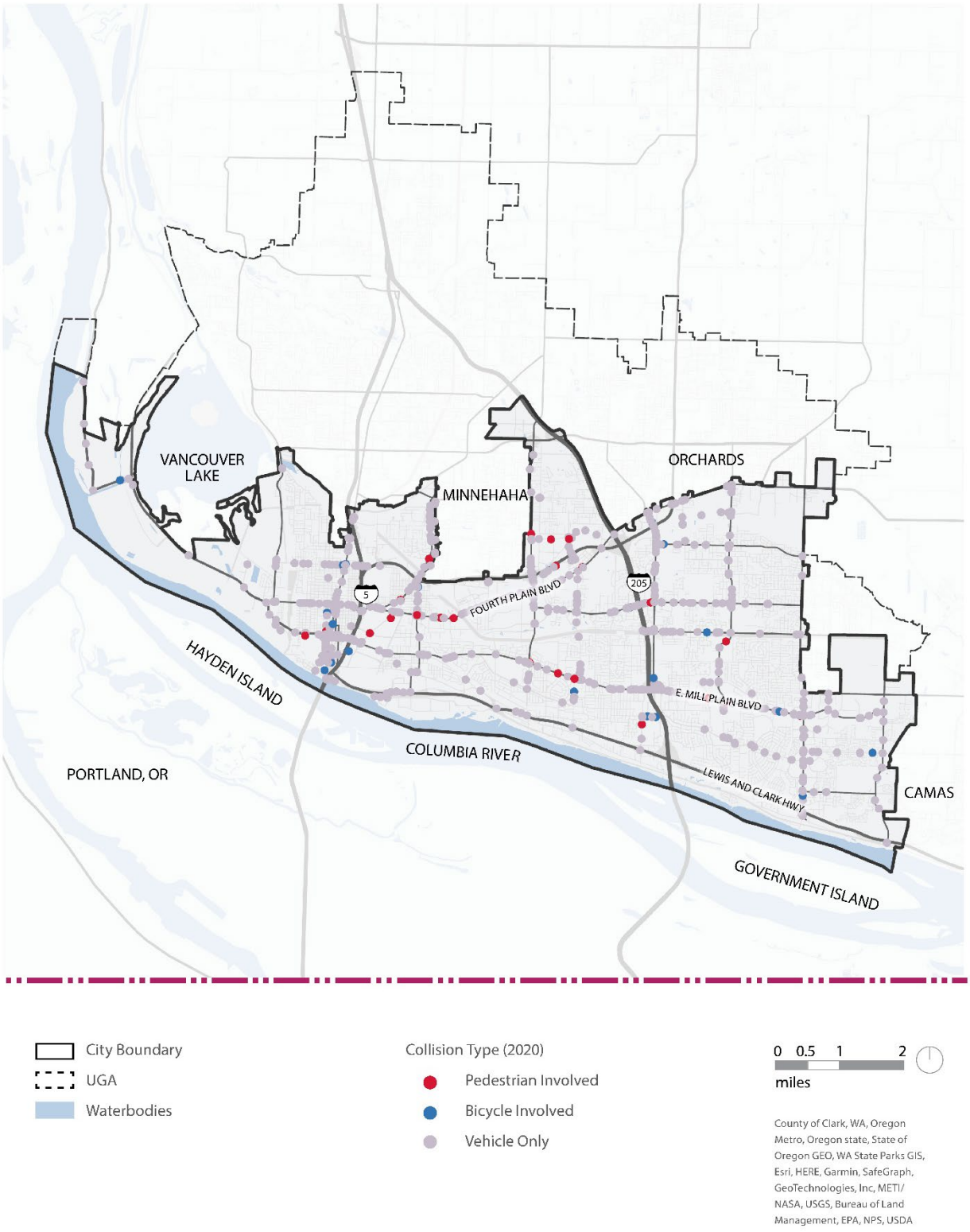
~~Figure 22~~ Figure 22 Figure 24 shows the City's future freight network, which includes I-5, I-205, SR 14, SR 500, SR 501, SR 503, Fourth Plain Boulevard, Mill Plain Boulevard, and others.

~~Figure 20~~ Figure 22. Road Classification Map



Source: Design Workshop 2024

~~Figure 21~~ Figure 23. Citywide Locations of Traffic Collisions in 2020



Source: Design Workshop 2024

~~Figure 22~~ Figure 24. Citywide Critical Freight Corridors



Source: City of Vancouver 2024a

Parking

Nearly half of ~~e~~City -managed off-street parking spaces are unoccupied on a typical weekday (City of Vancouver 2024a). Over one-third of on-street parking spaces are unoccupied on the average weekday (City of Vancouver 2024a). Updates to accommodate growth present an opportunity to right-size parking, balancing vehicle accessibility with the need to preserve valuable land for housing, recreation, and other uses.

Transit

C-TRAN operates bus routes of varying frequency that connect residents to destinations within the City and to Portland and neighboring municipalities. ~~Figure 23~~ ~~Figure 23~~ Figure 25 shows current bus routes and stop locations in the city.

Vancouver is home to the region's first bus rapid transit (BRT) system. The Vine BRT provides frequent daily service, every 15 minutes or better, along the Fourth Plain and Mill Plain corridors. Since opening in 2017, the Vine BRT has decreased travel times for riders by 12%, with up to 10 minutes saved per trip. Bus ridership has increased by 45% while per-passenger cost decreased by 21% (City of Vancouver 2024a). Approximately 25% of Vancouver residents live within a quarter mile of the Vine BRT lines (City of Vancouver 2024a).

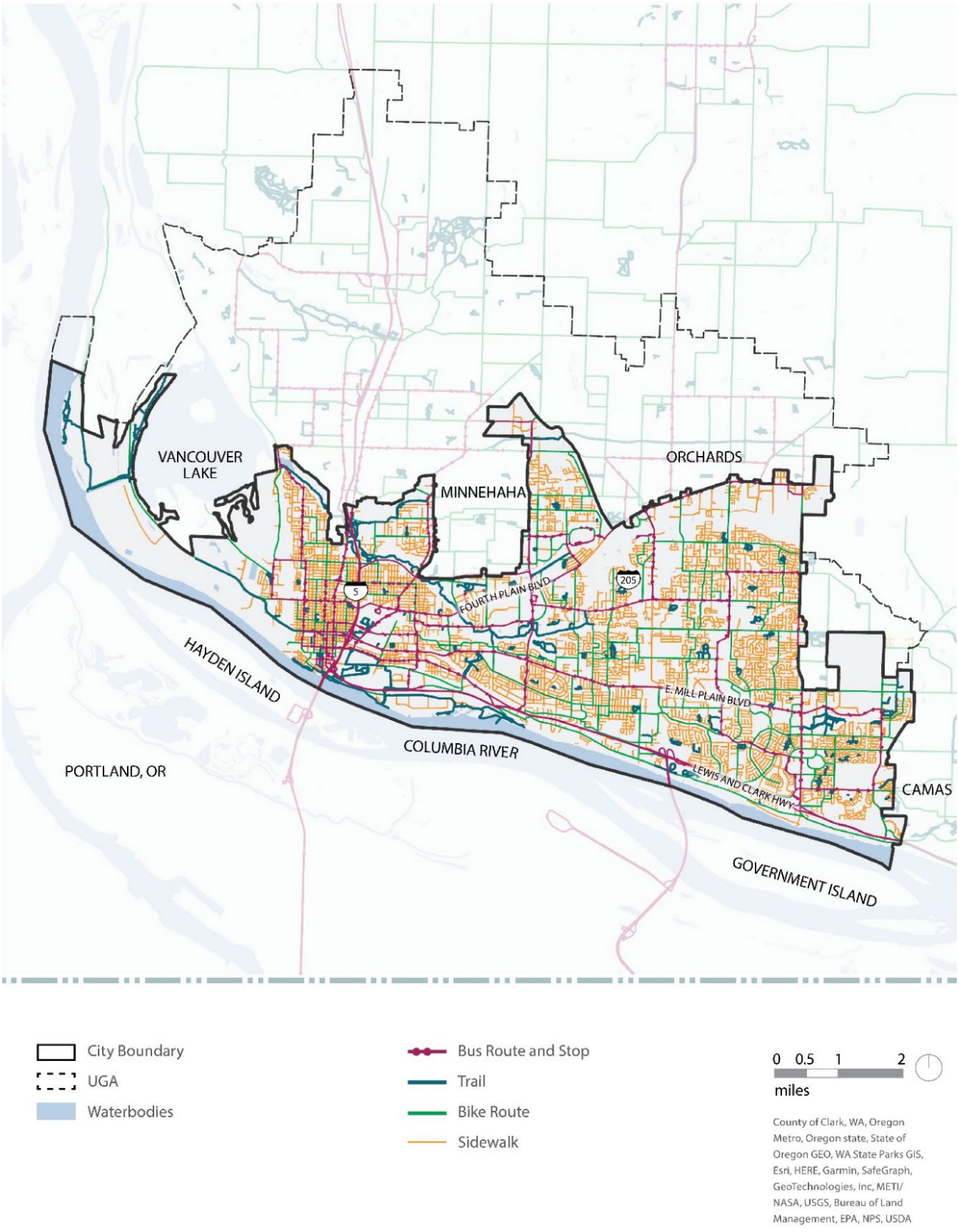
The C-TRAN ~~2021–2016~~2025-2030 Transit Development Plan calls for ~~a 10% increase in~~ increased service hours and frequency for various types of transit service and identifies capital needs to prepare for long-term growth (C-TRAN 2025).

Active Transportation

The City currently has 628 sidewalks, 10,630 curb ramps, and 129 miles of mobility lanes, including 29 miles of multi-use trails (City of Vancouver 2024a). Nine miles of arterial streets are currently lacking sidewalks (City of Vancouver 2024a). The TSP identifies nearly 230 planned small mobility and pedestrian projects and their priority level to help address these gaps. ~~Figure 23~~ ~~Figure 23~~ Figure 25 shows current active transportation facilities in the city.

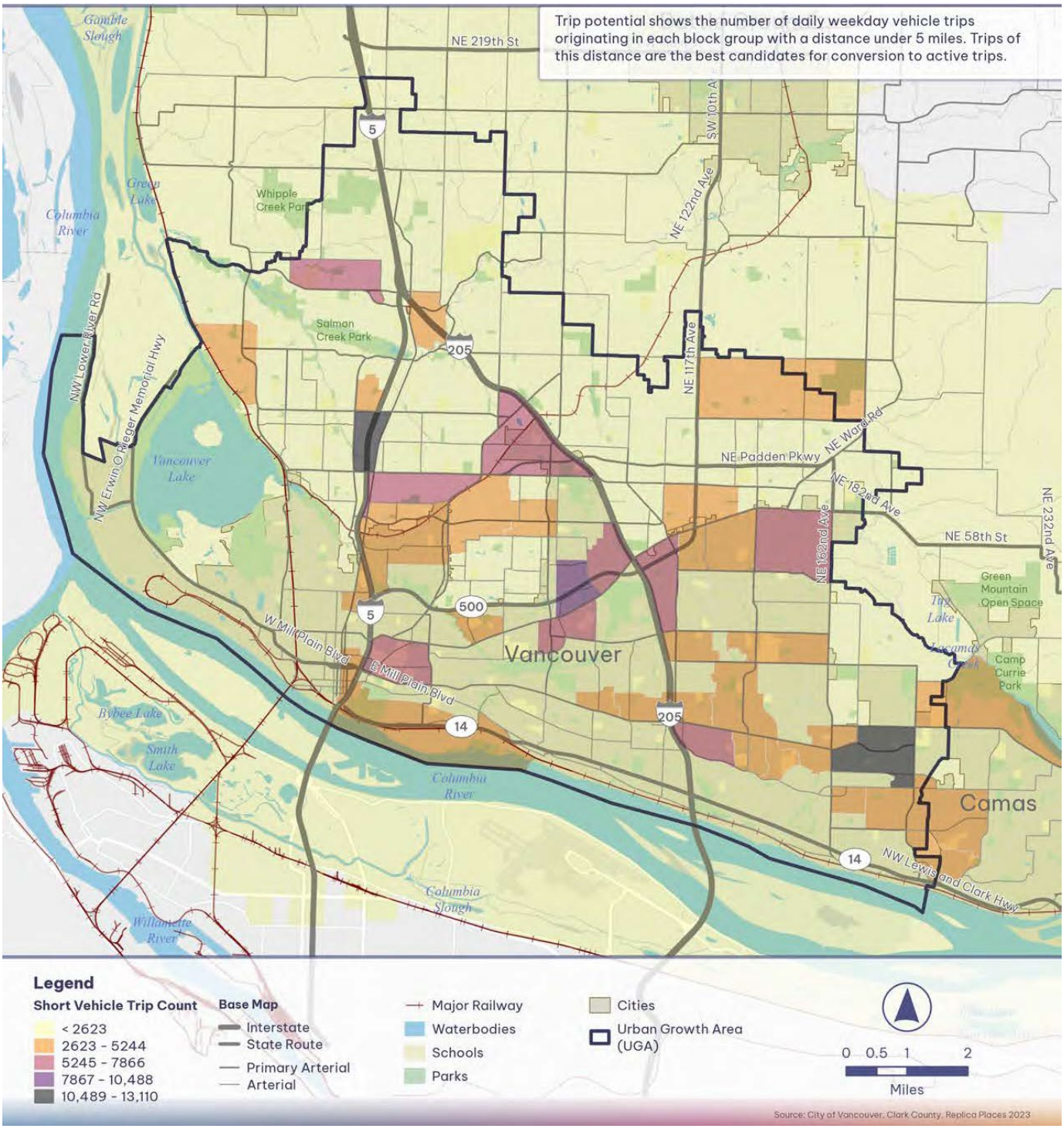
Looking to the future, there is strong potential for increasing active transportation trips in every part of the ~~c~~City and region (Alta 2024). Over one-third of vehicle trips in Vancouver ~~are~~ cover a distance of less than 4 miles and are therefore potential candidates for conversion to active trips (Alta 2024). To convert the most motor vehicle trips to active trips and achieve greenhouse gas emission reduction, implementing land use and transportation strategies in the areas surrounding Clark College, the Vancouver Mall, Walnut Grove, the Hazel Dell Towne Center, the Hewlett-Packard campus/Columbia Tech Center, the Salmon Creek Park and Ride, and the eastern end of SE Mill Plain Boulevard would likely yield the most benefits (Alta 2024). ~~Figure 24~~ ~~Figure 24~~ Figure 26 shows the concentration of short vehicle trips by location, with areas with more of these trips indicating a higher potential for future conversion to active trips throughout the city.

~~Figure 23~~ Figure 25. Existing Citywide Transit and Active Transportation Facilities



Source: Design Workshop 2024

~~Figure 24~~ Figure 26. Active Trip Potential in Clark County by Census Block Group Origin



Source: Alta 2024

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following transportation metrics:

- VMT
- Level of mode shift
- Mobility units
- Potential for increases in fatal/severe crashes

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. The regional transportation model outputs used for this analysis consider assumptions about future population and employment growth, expected changes in land use, and reasonably foreseeable future transportation projects. Therefore, the transportation effects analysis accounts not only for potential direct effects but also potential indirect and cumulative effects resulting from the Comprehensive Plan Update. Because of the comparative nature of the transportation analysis, impacts for all of the alternatives are discussed in this section to allow for an easier comparison across alternatives.

Vehicle Miles Traveled

All of the alternatives would increase VMT to some degree in 2045 as compared to existing conditions because of expected growth and development.

In comparison to the No Action Alternative, overall daily VMT for all vehicles would be about 10% higher under Alternative 1 and the Preferred Alternative, and about 12% higher under Alternative 2. There would be minimal to no difference in daily VMT for trucks between the ~~three~~ four alternatives.

Daily VMT per household would be similar to existing conditions for all of the alternatives. However, VMT per household is projected to be slightly lower under Alternatives 1 and 2 and the Preferred Alternative than the No Action Alternative, likely because they propose more areas with a mix of residential and commercial land uses, which could reduce the length and frequency of vehicle trips.

Table 12. Modeled Existing and Future Daily Vehicle Miles Traveled in Vancouver

Vehicle Type	Existing (2023)	No Action Alternative[a] (2045)	Alternative 1 (2045)	Alternative 2 (2045)	Preferred Alternative (2045)
All Vehicles Except Trucks	3,949,553	4,783,852	5,343,949	5,465,254	5,356,110
Trucks (in Passenger Car Equivalent)	215,391	544,077	541,923	541,302	549,024
Total	**4,315,718**	**5,327,928**	**5,885,872**	**6,006,556**	**5,905,133**
VMT Per Household (average miles per day)[b]	**45.6**	**44.9**	**42.5**	**41.9**	**42.6**

Source: RTC 2025, 2026

Notes:

a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

b VMT per household under existing conditions (2023) based on assumption of 94,587 households. For 2045, VMT per household is based on assumptions of 118,607 households in the No Action Alternative, 138,517 households in Alternative 1, ~~and~~ 143,473 households in Alternative 2, and 138,686 households in the Preferred Alternative, calculated by adding estimated new housing unit capacity to 2023 estimated household data from Clark County.

Level of Mode Shift

Mode shift refers to whether people change the way they choose to travel (e.g., from driving alone to walking or bicycling). There would be minimal to no difference in mode split among the alternatives in 2045 compared to existing conditions, indicating no mode shift resulting from the action alternatives, as shown in Table 13. The RTC model used to analyze mode shift does not completely account for shifts to active modes and only captures mode shift to transit. Additional mode shift to active transportation would be expected from short vehicle trips if active transportation infrastructure improves, allowing more people to have access to and feel comfortable walking or biking instead of driving for trips under three miles (Alta 2026).

Vehicular travel would remain the dominant transportation mode citywide, representing nearly 90% of trips, while transit and bike would have the lowest share of trips. Transit trips are projected to increase slightly, and single-occupancy vehicle trips are projected to decrease slightly, as a share of all transportation modes between existing and future conditions.

Table 13. Modeled Existing and Future Mode Split in Vancouver

Transportation Mode	Existing (2023)	No Action Alternative[a] (2045)	Alternative 1 (2045)	Alternative 2 (2045)	Preferred Alternative (2045)
Single-occupancy vehicles	49.0%	47.8%	47.9%	47.8%	47.7%
High-occupancy vehicles	39.7%	40.0%	39.8%	39.9%	39.9%
Transit	1.7%	2.7%	2.4%	2.4%	2.5%
Walk	7.4%	7.3%	7.6%	7.7%	7.6%
Bike	2.2%	2.2%	2.2%	2.2%	2.2%

Source: RTC 2025, 2026

Note:
a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

The average trip length across all transportation analysis zones within the City was projected to be about 4 miles under all of the alternatives (RTC 2025, 2026). This trip length of less than 5 miles indicates a similar potential for conversion of vehicle trips to active transportation trips under all alternatives.

Mobility Units by Transportation Analysis Districts

A mobility unit is a standardized measure used to quantify the transportation demand generated by a development or project. It is a broader way of looking at transportation demand than traditional vehicle trips because it represents the number of trips or movements (as measured in person miles) made by individuals using various modes of transportation, including walking, cycling, driving, and public transit. The concept of a mobility unit enables a more complete comparison and assessment of multimodal transportation impacts across different developments as well as the full range of multimodal system solutions (City of Vancouver 2024a).

Estimated mobility units were calculated for 2045 based on the new person trips originating in each district and the average trip length. Table 14 shows the relative differences in mobility units (as measured in person miles) between Alternative 1, Alternative 2, the Preferred Alternative and the No Action Alternative. ~~Figure 25~~ ~~Figure 25~~ Figure 27 shows the locations of the districts analyzed in the regional model.

The higher mobility units in most areas of the ~~e~~City under ~~both~~ the action alternatives, compared to the No Action Alternative, reflect the greater number of person trips by all modes within these districts. This is because of proposed land use changes that would generate greater concentrations of housing units and jobs, particularly in areas of East Vancouver like Evergreen/Burton and Fisher's Landing. Under Alternative 1, some areas, such as the Vancouver Central East and Vancouver Central West districts of West Vancouver, would experience no meaningful difference in mobility units compared to the No Action Alternative based on the projected lower new capacity for jobs and housing units in those areas.

Alternative 2 would generate higher mobility units in all districts than Alternative 1. The largest differences would be in Central Vancouver (North Van Mall district) and East Vancouver (in the districts of Evergreen/Burton, Cascade Park, Fisher's Landing), where denser or more intense land uses are proposed under Alternative 2 compared to Alternative 1 and the No Action Alternative (refer to the Land and Shoreline Use section of Chapter 3 for more details).

The Preferred Alternative would have a different distribution of mobility units across City districts than Alternatives 1 and 2. Similar to Alternative 1, the Preferred Alternative would result in no meaningful difference in mobility units for the Vancouver Central West district of West Vancouver compared to the No Action Alternative. It would generate higher mobility units in Downtown Vancouver, North Vancouver, and North Vancouver Mall than Alternative 1 and Alternative 2 because there would be a relatively greater capacity for new housing units in those areas. In contrast to Alternatives 1 and 2, Evergreen/Burton and Fisher's Landing would generate fewer mobility units because there would be less capacity for new housing units in those areas. Mobility units in Vancouver Central East and Cascades Park would be lower than Alternative 2 but higher than Alternative 1 because of the difference in new housing capacity.

Table 14. Mobility Units Originating from Transportation Analysis Districts as Compared to No Action Alternative in 2045

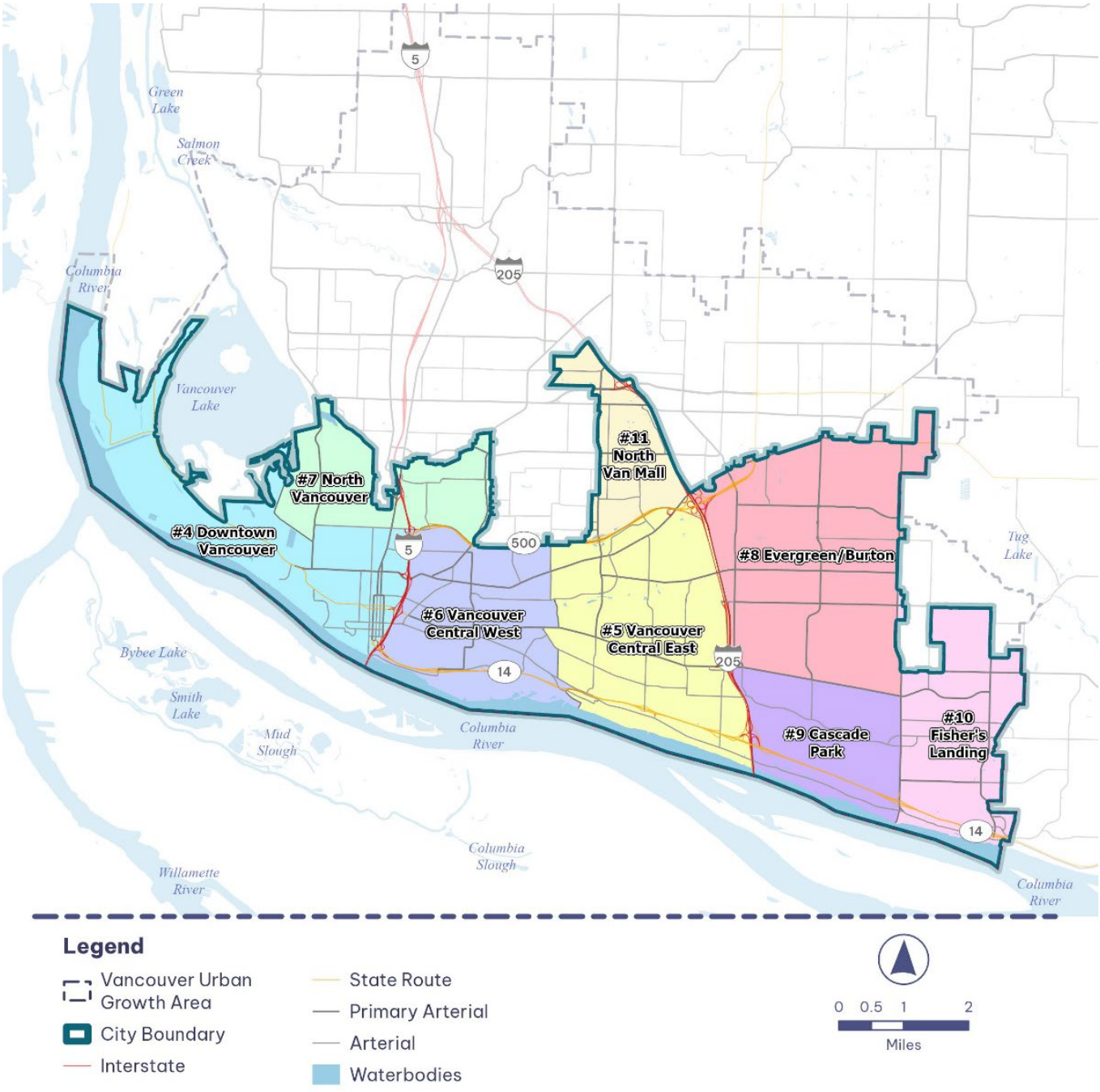
Map Reference	District	Alternative 1 (person miles per day)	Alternative 2 (person miles per day)	Preferred Alternative (person miles per day)
4	Downtown Vancouver	11,963	16,654	68,146
5	Vancouver Central East	0[a]	31,188	17,836
6	Vancouver Central West	0[a]	5,348	0[a]
7	North Vancouver	30,897	39,287	51,773
8	Evergreen/Burton	201,130	224,963	108,300
9	Cascade Park	35,022	61,481	58,262
10	Fisher's Landing	444,765	495,245	361,182
11	North Van Mall	33,959	53,712	108,687

Source: RTC 2025, 2026

Note:

a. 0 value represents that new person trips generated were lower in comparison to the No Action Alternative. The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

~~Figure 25~~ Figure 27. Locations of Transportation Analysis Districts



Source: RTC 2025

Potential for Increases in Fatal/Severe Crashes

Safety impacts were assessed based on projected future traffic volume differences between the No Action and Action Alternatives. The city's top 10 roadway segments as ranked by crash weight (based on the cost by injury level) from 2016 to 2020 were analyzed to determine how volume changes could affect safety at safety corridors identified in the City of Vancouver's Local Road Safety Plan, 2022–2026.

~~Both~~ Alternative 1, ~~and~~ Alternative 2, and the Preferred Alternative would have higher daily traffic volumes compared to the No Action Alternative across most safety corridors in 2045, as shown as percentage differences in Table 15. Compared to the No Action Alternative, there would be notably higher differences in traffic volumes on the SE Chkalov Drive, E Mill Plain Boulevard, Grand Boulevard and NE St. James Road segments under Alternative 2 than Alternative 1 because of more intense levels of development proposed near those roadways under Alternative 2. Alternative 2 would have marginally higher traffic volumes than Alternative 1 at most other locations. Under ~~both alternatives~~ Alternatives 1 and 2, the largest difference in traffic volumes compared to the No Action Alternative would be on the SE 164th Avenue segment in East Vancouver, which is near the Section 30 area that is proposed for redevelopment. However, traffic volumes at this location would be comparatively lower under the Preferred Alternative because there would be less capacity for new development in this area.

At most locations, the Preferred Alternative would have similar or lower traffic volumes than Alternatives 1 and 2, which reflects that new housing capacity would be spread more evenly throughout all areas of the city. One exception is NE St. James Road in Central Vancouver, which is forecast to have greater increases in traffic volumes than Alternatives 1 and 2.

An increase in volume does not necessarily indicate an increase in fatal or severe crashes. However, increases in traffic volumes can increase the number of crashes due to greater volumes of vehicles on the road and increased exposure to vehicles by all roadway users.

Table 15. Modeled Daily Volume Differences between No Action Alternative and Action Alternatives for Safety Corridors in 2045

Safety Corridor	Alternative 1	Alternative 2	Preferred Alternative
SE Chkalov Drive: SE Mill Plain Boulevard – SE 7th Street	9%	20%	13%
E Fourth Plain Boulevard: Falk Road – Stapleton Road	0%	3%	0%
NE Fourth Plain Boulevard: NE 121st Avenue– 127th Avenue	14%	14%	11%
SE 164th Avenue: SE 1st Street to SE Mill Plain Boulevard	45%	46%	17%
SE Mill Plain Boulevard: Chkalov Drive – 123rd Avenue	2%	3%	2%
E Mill Plain Boulevard: Grand Boulevard – Brandt	7%	14%	10%
NE 112th Avenue: 39th Street– 28th Street	6%	8%	2%
Grand Boulevard: Fourth Plain Boulevard – 33rd Street	1%	15%	16%
E Mill Plain Boulevard: Andresen Road – Garrison Road	4%	8%	7%
NE St. James Road: NE 49th Street - Petticoat	-9%	5%	19%

Source: RTC 2025, 2026

Note: The No Action is based on capacity only and does not account for the feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Avoidance, Minimization, and Mitigation Measures

Under all alternatives, future growth and associated increased demand for transportation facilities will be addressed as part of the City's regular capital project planning efforts and

updates to its six-year Transportation Improvement Program (TIP) (Table 16). The ~~current~~ latest adopted TIP identifies several large capital improvement projects, identified for completion during the six-year period between 2026~~5~~ and 2031~~0~~ (City of Vancouver 2025a).

Table 16. Planned Large Capital Transportation Improvement Projects, 2026-2031

Project	Focus
NE 137th Ave. from NE 49th to NE Fourth Plain Blvd.	Corridor upgrades to enhance safety, manage access and minimize delays now caused by turning vehicles.
NE 18th St. from NE 97th Ave. to NE 107th Ave.	New urban arterial and upgrade of existing segments to current arterial standards, including multimodal facilities.
Jefferson St. from W Evergreen Blvd. to W Mill Plain Blvd.	Urban arterial upgrade of existing roadway to two vehicle lanes with separated multi-use path.
NE 192nd Ave. from SE 1st St. to NE 18th St.	Urban upgrade of existing two-lane street to improve system, safety, mobility, and accessibility.
Fruit Valley Freight Access and Safety Improvements	New north–south freight corridor, including multimodal facilities.
NE 112th Ave. from E Mill Plain Blvd to NE 28th St.	Corridor improvements to bring NE 112th Ave. up to urban arterial standards, and address safety and accessibility issues for all modes.
NE 28th St. from 142nd Ave. to NE 162nd Ave.	Upgrade of existing two-lane former rural road to urban 3-lane minor arterial with multimodal facilities to address capacity and improve pavement and safety conditions.
NE 49th St. from NE 122nd Ave. to NE 137th Ave.	Upgrade of existing two-lane street to three-lane urban minor arterial with multimodal facilities to improve safety and capacity.
NE 18th St. from NE 164th Ave. to NE 192nd Ave.	Upgrade of two-lane principal arterial to increase safety and improve service levels.

Project	Focus
NE 18th St. from NE 142nd Ave. to NE 162nd Ave.	Upgrade of two-lane road to principal arterial standards.
NE 59th St. from NE 147th Ave. to NE 162nd Ave.	New three-lane minor arterial street with multimodal facilities to address circulation needs, improve safety, mobility, accessibility, and stormwater management.

Source: City of Vancouver 2025a

Specific measures to avoid, minimize, and mitigate impacts could potentially include developing infrastructure for active transportation such as walking and cycling, implementing intelligent transportation systems (ITS) for more efficient traffic management, and enhancing public transportation. These strategies aim to address increased travel demand and improve overall transportation capacity and efficiency.

In addition, implementation of the following policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential transportation impacts identified for the action alternatives:

Provide a reliable, frequent, and accessible transportation system that seamlessly connects residents to key areas of the ~~e~~City and region.

- Provide community members with access to low-carbon travel options, including walking, cycling, small mobility, and transit, to connect important destinations while reducing reliance on single-occupancy vehicles. Improve active transportation infrastructure particularly in areas with inadequate pedestrian and micromobility infrastructure, to increase the share of trips made by foot, bike, or other small mobility devices.
- Adopt street standards that create comfortable, inviting multimodal streets. Adopt connectivity standards to improve pedestrian and small mobility safety and accessibility.
- Apply standards to development, capital, maintenance, and planning projects including maximum block length, unconnected streets, cul-de-sac connections, linkages between land uses, and multiple access points.
- Implement the citywide low-stress bicycle and small mobility network that prioritizes safety and comfort for people of all ages and abilities.
- Designate and enhance freight corridors to facilitate efficient movement of goods and reduce congestion. Improve infrastructure and connectivity to and from the Port of Vancouver to streamline freight operations.
- Eliminate traffic-related fatalities and serious injuries and create a safe and comfortable travel environment for all users.

- Implement strategic pricing mechanisms to regulate the availability of on-street parking in Mixed-Use and Regional Activity Centers.
- Implement land use patterns that reduce VMT, traffic congestion, and greenhouse gas emissions per capita, ~~and~~ while improving~~e~~ safety and air quality.
- Tailor regulations, incentives, and investments to facilitate development and community resources near current and future transit stations, ensuring new development is accessible to historically excluded and underserved communities and those most reliant on public transit.
- Prepare for emerging technologies by updating City policies and operational requirements for shared mobility and emerging mobility vendors, including Autonomous Vehicles. Create data sharing agreements and vendor requirements.
- Develop guidance and encouragement for community use of the right-of-way, including plazas, parklets, "streateries," open streets events, public art, and demonstration projects.
- Ensure transportation systems meet universal design standards, prioritizing mobility solutions for disabled, senior, youth, and low-income residents across all modes.
- Work with nonprofit and private partners, Clark County and adjacent cities to build out the regional trail network for recreation and active transportation purposes.
- Coordinate closely with Clark County, other cities, and other government entities such as C-TRAN, the RTC, and school districts to sustainably manage urban growth areas, efficiently deliver urban services, expand regional transit and multimodal connectivity, and coordinate on shared goals and responsibilities, in accordance with adopted countywide planning policies.
- Update regulations and design guidance to reflect multimodal level of service (LOS) standards that require private development and capital projects to advance multimodal safety and support shifts to non-drive-alone modes.
- Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.
- Invest in infrastructure that supports reliable, frequent, and accessible transit service as outlined in the Enhanced Transit Network, while adapting to localized climate impacts. Prioritize improvements in underserved communities and areas with high climate vulnerability. These investments should expand mobility options, improve neighborhood access, and deliver health, economic, and social benefits.
- Work with local, state, federal and tribal partners to ensure that new construction or replacement of critical infrastructure is programmed to avoid community harm and maximize social, environmental, and cultural value.

Significant Unavoidable Adverse Impacts

All alternatives have the potential to create impacts to existing transportation infrastructure as a result of expected population and job growth and development, with greater potential impacts under Alternatives 1 and 2 and the Preferred Alternative than the No Action Alternative. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to transportation are anticipated for any of the alternatives.

Noise

Methodology

Analysts reviewed relevant information sources and policies to qualitatively describe existing citywide noise conditions, including the following sources:

- WAC 173-60, Maximum Environmental Noise Levels: Establishes maximum permissible noise levels for three classes of environmental designations for noise abatement (EDNA): residential (generally known as Class A in the WAC), commercial (Class B), and industrial (Class C) noise, as shown in Table 17, along with construction noise limits.
- VMC 20.935, Off-Site Impacts (VMC 20.450.007 in proposed code): Includes mitigation requirements where potential impacts to adjacent uses from a proposed land use or development are identified. Outdoor construction, including construction staging, is limited to 7:00 a.m. to 8:00 p.m. seven days a week.
- VMC 20.520, Noise Impact Overlay District: Recognizes that certain areas of the ~~e~~City experience greater levels of transportation noise through establishment of a Noise Impact Overlay District. This district covers the part of the ~~e~~City determined to be most affected by noise from Portland International Airport, Burlington Northern Railroad, I-5, and Pearson Airport. The code regulates and places limits on new construction, expansion, and reconstruction of residential structures within this district.
- U.S. Department of Transportation National Transportation Noise Map (USDOT 2020).

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Potential for construction noise impacts in residential/noise-sensitive areas
- Potential for increased transportation noise impacts in residential/noise-sensitive areas
- Capacity for new housing in areas with high transportation noise

Analysts estimated potential changes in noise levels from transportation sources based on outputs from the RTC regional transportation demand model, as described in the Transportation section.

Table 17. Maximum Washington State Permissible Noise Levels

EDNA of Noise Source	EDNA of Receiving Property (dBA) Class A[a]	EDNA of Receiving Property (dBA) Class B	EDNA of Receiving Property (dBA) Class C
Class A	55 / 45	57	60
Class B	57 / 47	60	65
Class C	60 / 50	65	70

Source: WAC 173-60-040

Note:
a Limits for noise received in Class A EDNA are reduced by 10 dBA during nighttime hours (10 p.m. to 7 a.m.).
Key: EDNA = environmental designations for noise abatement

Affected Environment

As with most urbanized environments, the most common sources of environmental noise in Vancouver come from transportation and heavy industrial uses.

The primary noise sources in the area include vehicles traveling on I-5, I-205, SR 14, SR 900, and arterial roads. While not as consistent as noise from various roadways located in the comprehensive plan area, aircraft noise from Portland International Airport and Vancouver Pearson Field, and railway noise along the BNSF Railway paralleling I-5 and SR 14 and the Portland Vancouver Junction Railroad contribute to overall noise levels.

Noise from industrial facilities located along the Vancouver Waterfront and near the railways and from a variety of ongoing construction projects in and around downtown Vancouver influence noise levels in these localized areas.

The National Transportation Noise Map identifies areas with existing exposure to aviation, highway, and rail noise (USDOT 2020). Table 18 summarizes current ranges of transportation noise levels throughout Vancouver. ~~Figure 26~~ Figure 26 Figure 28 shows a map of the distribution of existing transportation noise levels throughout the Vancouver area, which indicates higher noise levels near highways and major arterials.

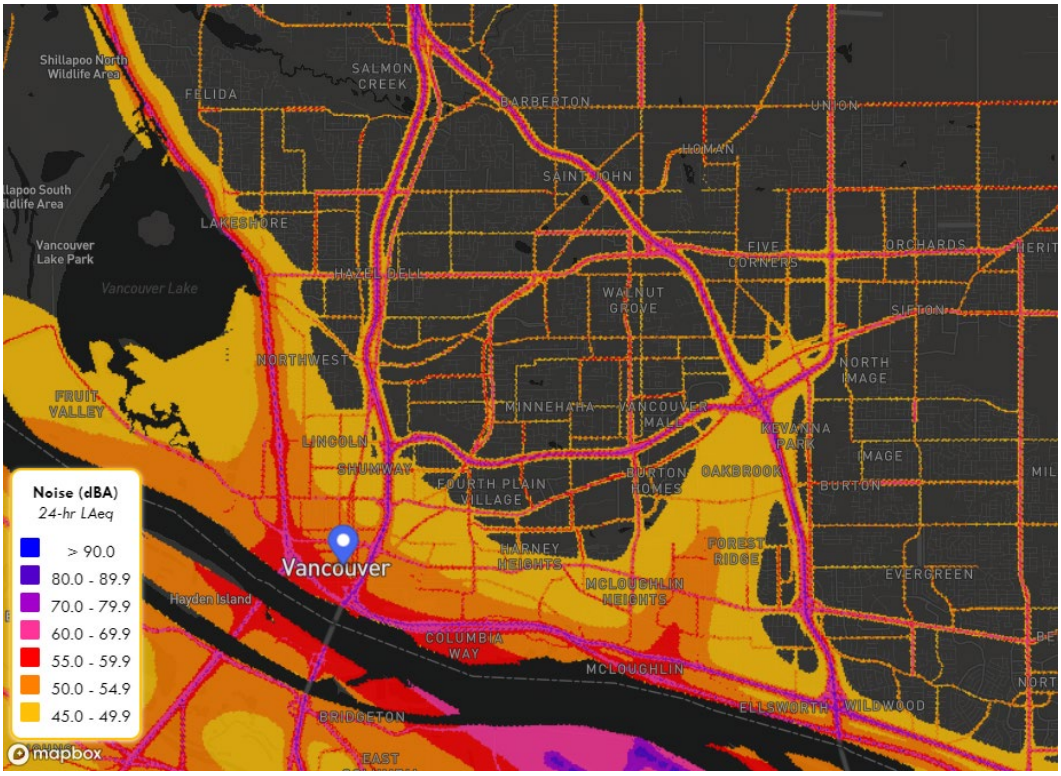
Table 18. Existing Transportation Noise Levels in Vancouver

Mode	Existing Noise Level (dBA)	Location
Aviation	45.0 to 59.9	Increases with proximity and extends farthest directly north of the Portland airport.
Road	50.0-89.9 40.0-59.9	Along I-5, I-205, SR 14, and SR 500 Arterial roads
Rail	45.0 to 89.9	Along the BNSF Railway (paralleling I-5 and SR 14) and the Portland Vancouver Junction Railroad

Source: USDOT 2020

Key: dBA = A-weighted decibels; I = Interstate; SR = State Route

~~Figure 26~~ Figure 28. Distribution of Existing Transportation Noise Levels in Vancouver Area



Source: USDOT 2020

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following noise metrics:

- Potential for construction noise impacts in residential/noise-sensitive areas
- Potential for increased transportation noise impacts in residential/noise-sensitive areas
- Capacity for new housing in areas with high transportation noise

The regional transportation model outputs that informed this noise analysis consider assumptions about future population and employment growth, expected changes in land use, and reasonably foreseeable future transportation projects. Therefore, the noise effects analysis accounts not only for potential direct effects but also potential indirect and cumulative effects resulting from the Comprehensive Plan Update.

Impacts Common to All Alternatives

All alternatives would include new development of residential (referred to in the WAC as Class A source and receiving properties), commercial (Class B source and receiving properties), and industrial (Class C source and receiving properties) lands. As shown in Table 17, a Class B noise source affecting Class A receiving properties is restricted to a sound level of 57 A-weighted decibels (dBA) during daytime hours (7 a.m. to 10 p.m.) and 47 dBA during nighttime hours (10 p.m. to 7 a.m.). A Class C noise source affecting Class A receiving properties is restricted to a sound level of 60 dBA during daytime hours and 50 dBA during nighttime hours.

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Potential for substantial construction noise impacts in residential/noise-sensitive areas

All alternatives would include construction activities associated with future growth and development, which would increase short-term noise levels at noise-sensitive areas, such as residences, schools, and nursing homes. Because of the requirements of H.B. 1110, all of the alternatives would allow for new housing development on ~~e~~City lands currently designated as Urban Lower Density, which could potentially result in construction activities immediately adjacent to existing noise-sensitive residential properties.

The level of these temporary impacts would depend on the proximity to construction activities, and other local context such as topography, the extent of existing ambient noise from roadways and other nearby sources. Construction of taller buildings and/or structures with underground parking would have the greatest potential for temporary noise impacts

because these building types would likely require use of louder construction equipment, such as pile drivers, for foundation work.

Potential for increased transportation noise impacts in residential/noise-sensitive areas

After construction of individual developments, additional operational noise is anticipated under all alternatives because of projected increases in volumes of vehicles traveling on existing and future roadways, increases in rail and aircraft activity associated with future growth and development, and potential increases in industrial noise due to increased demand to carry passengers and goods in and out of the area.

New roadways, buildings, and typical activities associated with an increased population in an area all contribute to higher noise levels and a greater likelihood of disturbance caused by noise. The changes in noise levels between existing and future conditions would not be noticeable in most areas included in the City's proposed changes to the Comprehensive Plan because similar levels of transportation noise and noise associated with nearby development are part of the existing noise environment.

Minor increases in noise levels would be most noticeable at residences and other land uses sensitive to noise, such as schools, nursing homes, churches, parks, and other outdoor use areas located near planned development corridors where construction and increased use of transportation facilities would be most pronounced. Noise level increases under all alternatives compared to existing noise levels would not likely be noticeable year by year but would be noticeable over decades of more expansive local and regional development.

Based on traffic data developed for each alternative from the regional transportation model, as described in the Transportation section, future (2045) vehicle traffic volumes would not vary between the No Action and Action Alternatives to the degree that would result in a noticeable change in future traffic noise levels.

Any minor increase in long-term operational noise levels with the future alternatives compared to existing noise levels would fall below the threshold of human perception, which is 2 to 3 dBA for most individuals. Increases in noise would result from minor increases in transportation vehicle volumes and temporary increases in construction noise from future growth and planned development. A doubling of traffic volume is generally needed to result in a noticeable change (approximately 3 dBA) in traffic noise levels per Federal Highway Administration noise regulations (23 Code of Federal Regulations 772).

Capacity for new housing in areas with high transportation noise

All alternatives would provide limited capacity for building new housing units in areas with existing transportation noise above 55 dBA, based on mapping from the U.S. Department of Transportation (refer to ~~Figure 26~~ Figure 28). The U.S. Department of Housing and Urban Development has established 55 dBA as the maximum average day-night level for exterior noise at residences (HUD 1977). Details of varying levels of housing in areas with high transportation noise are described in each alternative below.

~~Based on the modeled locations of new housing units, as described in the Housing section, about 6% of the new housing unit capacity under each alternative would be located in higher transportation noise areas in East, Central, and West Vancouver, primarily near existing transportation corridors such as I-5, I-205, SR 14, and Mill Plain Boulevard. This percentage translates to about 1,600 to 3,100 housing units depending on the alternative (lowest capacity under No Action, highest capacity under Alternative 2).~~

No Action Alternative

Potential for substantial construction noise impacts in residential/noise-sensitive areas

No additional construction noise impacts were identified for the No Action Alternative beyond those discussed in the Impacts Common to All Alternatives section. The No Action Alternative would have the lowest potential for substantial construction noise impacts of all the alternatives because it would have the lowest capacity for new housing units, jobs, and associated new development.

Potential for increased transportation noise impacts in residential/noise-sensitive areas

No additional effects were identified for the No Action Alternative beyond those discussed in the Impacts to All Alternatives section. Noise levels under the No Action Alternative would increase at a similar rate as they have in recent years with future growth and development planned in line with the current adopted City Comprehensive Plan and development regulations.

Capacity for new housing in areas with high transportation noise

Based on the modeled locations of new housing units, as described in the Housing section, about 6% of the new housing unit capacity under the No Action Alternative would be located in higher transportation noise areas in East, Central, and West Vancouver, primarily near existing transportation corridors such as I-5, I-205, SR 14, and Mill Plain Boulevard. This percentage translates to about 1,600 housing units. ~~No additional effects were identified for the No Action Alternative beyond those discussed in the Impacts to All Alternatives section.~~

Alternative 1

Potential for substantial construction noise impacts in residential/noise-sensitive areas

Construction noise associated with Alternative 1 would potentially be more frequent and extend for longer periods than construction resulting from the No ~~Build~~ Action Alternative because of the higher capacity for new development anticipated under Alternative 1. However, localized construction noise levels are anticipated to be similar to No ~~Build~~ Action Alternative construction noise levels because the activities and equipment required would be similar and would occur in accordance with City noise ordinances.

Potential for increased transportation noise impacts in residential/noise-sensitive areas

The proposed increase in density under Alternative 1 would result in moderately higher noise levels along growth corridors identified in the study area compared to the No Action Alternative because of a marginally higher number of vehicles traveling on existing and future roadways. There would also be moderately higher noise levels from other transportation sources including rail, aircraft, and industrial noise, because of higher expected demand to transport passengers and goods and services in and out of the area compared to the No Action Alternative.

Capacity for new housing in areas with high transportation noise

Similar to the No Action Alternative, about 6% of the new housing unit capacity under Alternative 1 would be located in higher transportation noise areas in East, Central, and West Vancouver. This percentage translates to about 2,800 housing units. ~~No additional effects were identified for Alternative 1 beyond those discussed in the Impacts to All Alternatives section.~~

Alternative 2

Potential for substantial construction noise impacts in residential/noise-sensitive areas

Construction noise associated with Alternative 2 would be more frequent and extend for longer periods than construction resulting from the No ~~Build~~ Action Alternative because of the higher capacity for new development. Alternative 2 would allocate the most land area for zoning districts such as Regional Activity Center and Mixed Use that allow for taller buildings, which could result in higher construction noise levels because of the heavy equipment (e.g., pile drivers) needed.

Potential for increased transportation noise impacts in residential/noise-sensitive areas

The higher-intensity development under Alternative 2 would result in slightly higher noise levels along growth corridors identified in the study area compared to Alternative 1 and the

Preferred Alternative because of a marginal projected increase in the number of vehicles traveling on existing and future roadways. There may be slightly higher noise levels from other transportation sources including rail, aircraft, and industrial noise because of potentially greater demand to transport passengers and goods and services in and out of the area compared to the other alternatives.

Capacity for new housing in areas with high transportation noise

Similar to the No Action Alternative and Alternative 1, about 6% of the new housing unit capacity under Alternative 2 would be located in higher transportation noise areas in East, Central, and West Vancouver. This percentage translates to about 3,100 housing units. ~~No additional effects were identified for Alternative 2 beyond those discussed in the Impacts to All Alternatives section.~~

Preferred Alternative

Potential for substantial construction noise impacts in residential/noise-sensitive areas

Short term construction noise associated with the Preferred Alternative would potentially be more frequent and extend for longer periods than construction resulting from the No Action Alternative because of the higher capacity for new development anticipated under the Preferred Alternative. However, localized construction noise levels are anticipated to be similar to the No Action Alternative construction noise levels because the activities and equipment required would be similar and would occur in accordance with City noise ordinances.

Construction noise related to new housing development would be more similar to Alternative 2 because the Preferred Alternative would have a similar split of land zoned for Low-Scale and Medium-Scale neighborhoods. Construction noise related to Mixed Use and Regional Activity Center developments would be more similar to Alternative 1, which has less land allocated for these higher-intensity uses and taller buildings than Alternative 2 and therefore would have fewer areas with these louder anticipated construction noise levels.

Potential for increased transportation noise impacts in residential/noise-sensitive areas

The higher-intensity development under the Preferred Alternative would result in slightly higher noise levels along growth corridors identified in the study area compared to Alternative 1 and slightly lower noise levels in the same areas compared to Alternative 2. The slight difference in noise levels is because of a marginally higher numbers of vehicles traveling on existing and future roadways compared to Alternative 1 and marginally lower numbers of vehicles compared to Alternative 2. There may be slightly higher noise levels from other transportation sources including rail, aircraft, and industrial noise because of potentially

greater demand to transport passengers and goods and services in and out of the area compared to the other alternatives.

Capacity for new housing in areas with high transportation noise

The Preferred Alternative would have the highest potential for new housing unit capacity located in higher transportation noise areas, with about 11% in East, Central, and West Vancouver. This percentage translates to about 5,200 housing units. The capacity for housing units in these areas would be higher than Alternatives 1 and 2 because the Preferred Alternative analysis was updated to account more accurately for master plans across the city, which are predominantly located in areas with high transportation noise corridors. These master plans, covering areas such as Waterfront, The Heights, the area located at the intersection of 192nd Ave. and State Route 14 known as HQ, Columbia Palisades, Section 30, and Vancouver Innovation Center, were approved for development prior to the Comprehensive Plan update process.

Avoidance, Minimization, and Mitigation Measures

Temporary construction noise will be managed through best management practices, which include requiring contractors to follow all state and local restrictions on construction timing and maximum noise levels. Additional measures can be used to reduce temporary construction impacts at noise-sensitive locations. These measures could include requiring contractors to locate their loudest equipment farther from noise-sensitive locations and provide shielding around the loudest equipment.

No substantial increases in noise are expected to occur under the alternatives; therefore, no mitigation measures are proposed. All environmental noise would continue to be regulated by WAC 173-60 and VMC 20.935.

In areas where development is planned near existing or future sources of higher noise levels, the City may consider whether to require implementation of noise reduction methods such as locating noise-sensitive areas further from noise sources, including walls or other barriers to shield noise from noise-sensitive use locations; and designing interior spaces with noise-reducing building materials.

In addition, implementation of the following policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential noise impacts identified for the action alternatives:

- Reduce and mitigate noise pollution from major stationary and mobile sources (air travel, vehicles, freight, ~~and~~ railroads, high-intensity industrial uses), prioritizing vulnerable populations and reducing the impact in residential, commercial, and natural areas.

- Mitigate the impacts of air, water, heat, noise, and light pollution, with a focus on areas with high environmental health disparities.

Significant Unavoidable Adverse Impacts

All alternatives would have the potential to increase short-term and long-term noise levels to some extent because of expected growth and development. The anticipated growth would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to noise are anticipated for any of the alternatives.

Public Services and Utilities

Methodology

Analysts reviewed relevant information and policies to describe existing citywide conditions for public services and utilities (fire, police, schools, parks and recreation, water, wastewater, sewer, electricity, other energy utilities, and solid waste), including the following sources:

- Community Atlas (Design Workshop 2024)
- City of Vancouver Comprehensive Water System Plan (City of Vancouver 2015)
- City of Vancouver Parks, Recreation, and Cultural Services Comprehensive Plan 2022-2031, updated for 2023-2032 (City of Vancouver 2022a)
- City of Vancouver 2025-2030 Capital Improvement Program for Water, Wastewater, Sewer Connection Incentive Program, Surface Water (City of Vancouver 2024c)
- Clark Public Utilities Integrated Resource Plan (CPU 2024)
- Evergreen School District Capital Facilities Plan (EPS 2019)
- Vancouver Fire Department 2024 Annual Report (VFD 2024)
- Vancouver Public Schools Capital Facilities Plan (VPS 2022)

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Increased demand for services or utilities that exceeds levels of service or capabilities beyond mitigatable levels
- Consistency with capital improvement plans (CIP)

Affected Environment

Fire

The Vancouver Fire Department (VFD) provides fire protection and emergency medical services (EMS) to the City and Clark County (Fire District 5), covering 89.2 square miles, including 22 miles of shoreline along the Columbia River. In addition to fire and EMS, they provide marine response, fire prevention, and fire investigation. Regionally, they provide hazardous materials and technical rescue responses (VFD 2024).

VFD has 11 stations, operated by 245 VFD and 190 American Medical Response (AMR) personnel, which serve the city limits and urban growth area. VFD uses a metric of firefighters per 1,000 people as one way of projecting future needs to maintain or improve levels of service to the community. The current ratio is 0.83 firefighters per ~~person~~ 1,000 people.

VFD is planning to relocate and construct new facilities for Station 3 in The Heights in Central Vancouver and Station 6 in Burton Ridge in East Vancouver over the next five years to address growing needs in these areas, and to complete seismic retrofits of Fire Stations 4 and 8 in the next 6 years. The City also plans to rebuild Fire Station 5 in the next 10 years. The City is also considering construction of new fire stations downtown and/or in the St. Johns area to accommodate future ~~e~~City growth and ensure adequate emergency response times and serviceability.

VFD provided 1,536 fire suppression responses, 40 technical rescues, 24 maritime responses, and 234 responses to hazmat situations in 2023 (VFD 2024). Since 2015, the City has contracted with AMR to provide ambulance services within the city. Both AMR and VFD use the same standard operating procedures. (City of Vancouver and AMR 2023). Table 19 and Table 20 provide the VFD and EMS response times by alarm type and what percent met established standards. These tables also indicate the number of calls received in 2023 by alarm type.

Table 19. Vancouver Fire Department Response Times

Alarm Type	Standard Response Time (minutes)	2023 Average Response Time (minutes)	2023 % met Standard	Number of Calls Received in 2023	% Change over 2022
Priority 1 and 2 Except Marine	7:59	8:38	86.2%	15,806	5.8%
Priority 3 and 4 Except Marine	10:59	9:10	95%	8,642	-23.3%
Priority 5 Non-Medical	15:59	11:05	97.58%	5,051	1%
Priority 5 Emergency Medical – Ambulance Only	17:59	19:41	88.3%	7,858	-16.7%
Marine – All Calls	19:59	34:02	45.8%	24	60%
Fire Suppression Full Alarm	15:59	15:40	91.7%	84	-12.5%
Aircraft Rescue and Firefighting	15:59	N/A	N/A	0	N/A
Technical Rescue	60:00	N/A	N/A	0	N/A
Hazardous Materials	60:00	N/A	N/A	234	-3.7%

Source: VFD 2024

Key: N/A = not applicable

Table 20. EMS Response Times

Alarm Type	Standard Response Time (minutes)	2023 Actual Compliance %	Number of Calls Received in 2023
Priority 1 and 2 – High Density	9:59	87.24%	21,898
Priority 1 and 2 – Low Density	19:59	91.13%	1,984
Priority 3 and 4 – High Density	12:59	91.58%	16,414
Priority 3 and 4 – Low Density	19:59	89.73%	1,597
Priority 5 and 6 – High Density	17:59	91.44%	12,283
Priority 5 and 6 – Low Density	29:59	94.86%	836
Routine – EMSD2 Area Only – Inter-facility Scheduled (12-hour pre-scheduled)	15	59.76%	743
Routine – EMSD2 Area Only – Inter-facility Non-scheduled (less than 12-hour pre-scheduled)	60	74.46%	3,782

Source: VFD 2024

Police

The Vancouver Police Department (VPD) provides police services in the ~~c~~City and is authorized to employ 241 officers, with 226 sworn members as of February 2025 (VPD 2025). Similar to VFD, VPD uses a metric of officers per 1,000 people to help project future needs to maintain or enhance its services to the community. VPD currently has a ratio of 1.2 officers per 1,000 people but has identified a need to increase that number to 1.4 officers per 1,000 people to be more consistent with the national average of 1.6 officers per 1,000 people. A ballot initiative, Proposition 5, planned for fall 2025, ~~if~~ which was approved by voters, would help to fund hiring of new officers to meet that goal.

VPD serves approximately 50 square miles, divided into two precincts, east and west, which are further divided into two districts per precinct. Each district is then divided into beats, and individual patrol officers are responsible for handling calls for service within each beat. The City has identified a replacement of VPD Headquarters on its list of capital improvements

through 2036. VPD reports that its east and west precinct buildings are currently at capacity for current staff levels and have limited potential for expansion because of land constraints.

Table 21 summarizes the number of events initiated by community members and by officers in 2024, as well as the average response time for community-initiated events (VPD 2024). The event priority number refers to the level of emergency, with Priority 1, 2, and 3 indicating calls that require an immediate response and lower numbers referring to those with less immediacy.

Table 21. Vancouver Police Department Response Times

Event Priority	2024 Community-Initiated Events (% Change from 2023)	Average Response Time – Community-Initiated Events (Minutes)	2024 Officer-Initiated Events (% Change from 2023)	Total Events (% Change from 2023)
1	460 (-16.2%)	5.56	11 (-50.0%)	471 (-17.5%)
2	5,968 (-4.7%)	8.34	192 (6.1%)	6,160 (-4.4%)
3	43,034 (-7.1%)	10.74	19,922 (64.4%)	62,956 (7.7%)
4	21,972 (-10.3%)	13.82	12,413 (-6.2%)	34,385 (-8.9%)
5	2,307 (-21.7%)	13.18	1,564 (-10.0%)	3,871 (-17.4%)
9	5,349 (-15.4%)	7.46	19 (11.8%)	5,368 (-15.3%)
Total	**79,090 (-9.0%)**	**10.82**	**34,121 (25.0%)**	**113,211 (-0.9%)**

Source: VPD 2024

Schools

The Vancouver school system is a mix of public, charter, private, and special schools. Two regional public school districts have facilities ~~in~~ in Vancouver: the Vancouver Public School District (VPS) and the Evergreen School District (Evergreen SD). The City also is home to the Washington School for the Deaf, the Washington School for the Blind, and Clark College, a community college offering bachelor's and associate degrees and certificates. ~~Figure 27~~ ~~Figure 27~~ Figure 29 shows the location of schools and school districts in Vancouver.

VPS is the primary provider of public education in West and Central Vancouver. The school district consists of 21 elementary, 6 middle, and 7 high schools covering a district of 58

square miles, as well as 5 specialty schools (VPS n.d.). The average student-teacher ratio is 17:1, which is less than the state average of 19.7:1.

In 2022, VPS adopted a six-year Capital Facilities Plan (CFP) that established average classroom sizes for elementary, middle, and high school grade levels (VPS 2022). The CFP guidelines suggest that average class sizes should be 21.5 students per classroom in elementary schools, 26 students per classroom in middle schools, 27 students per classroom in high schools and 10 students per classroom for special education students. The CFP projected insufficient capacity at two schools, Ogden Elementary in Central Vancouver and Sacajawea Elementary in West Vancouver, and called for adding classrooms and co-op space at both schools. All other VPS schools had reported enrollment levels below their building capacity. VPS uses standard assumptions about new student generation rates to forecast their capacity needs, as shown in Table 22.

Table 22. Average Student Generation Rates for Vancouver Public Schools (2022)

School Level	Single-Family Housing Student Generation Rate	Multifamily Housing Student Generation Rate
Elementary School (K-5)	.183	.103
Middle School (6-8)	.076	.046
High School (9-12)	.089	.058

Source: VPS 2022

The Evergreen SD serves Clark County and the eastern part of Vancouver and consists of 22 elementary, 6 middle, and 6 high schools serving about 22,000 students (EPS n.d.). It also includes 4 specialty schools.

Evergreen SD is currently in the process of updating the six-year CFP however, according to information provided by the district in 2025, it will establish the following average classroom sizes for specific school grades (EPS 2025):

- Grades Kindergarten-3 – not to exceed 23.67 students per class
- Grades 4 -5 – not to exceed 25 students per class
- Special Education – 1 to 15 students per classroom for elementary schools
- Grades 6-8 – not to exceed 27.33 students per class
- Grades 9-12 – not to exceed 30 students per class
- Special Programs (e.g., music, art, and physical education) –20 to 70 students per class

The updated Evergreen SD CFP projects a decrease in enrollment that will level off and remain steady through 2032 (EPS 2025). One factor hindering enrollment growth has been the slow growth in the child population within Evergreen SD boundaries. The annual kindergarten-to-birth (K-to-birth) ratio is a key metric representing a combination of net migration between birth and age five and the share of five-year-old residents enrolled in district kindergarten classes, often referred to as a "capture rate."

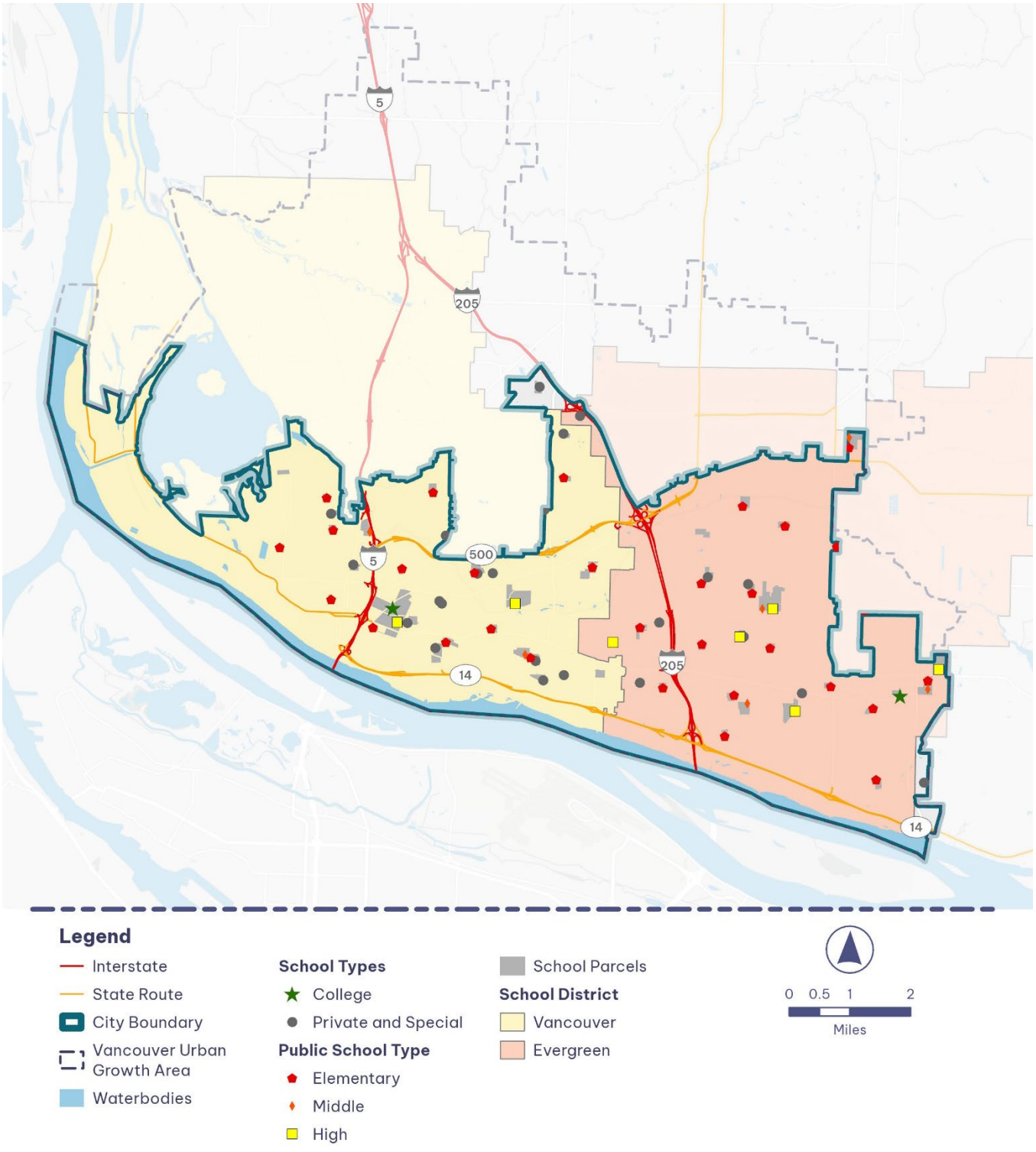
Evergreen SD also uses standard assumptions about new student generation rates to forecast their capacity needs, as shown in Table 23. The ratios for Evergreen SD have fluctuated, recovering from the 2020-21 low of 0.75, but have not returned to pre-pandemic levels. The middle scenario assumes that K-to-birth ratios will increase slightly in the next years before stabilizing at 0.89 from 2028 through 2032.

Table 23. Average Student Generation Rates for Evergreen School District (2023-2024)

School Level	Single-Family Housing Student Generation Rate	Multifamily Housing Student Generation Rate
Elementary School (K-5)	.164	.066
Middle School (6-8)	.072	.03
High School (9-12)	.109	.037

Source: EPS 2025

~~Figure 27~~ Figure 29. Schools by Type and District Boundaries



Source: Clark County n.d.

Parks and Recreation

The Vancouver Department of Parks, Recreation and Cultural Services (VPRCS) oversees and manages a total of 1,775 acres of parkland across 106 sites and 20 miles of trails, as shown in ~~Figure 28 Figure 28~~ Figure 30. Since 2014, the City of Vancouver has acquired nearly 50 acres of public land and developed more than 12 acres of parkland, with several additional park upgrades completed or in progress (City of Vancouver 2022a).

Vancouver is divided into three Park Impact Fee (PIF) Districts, each of which establishes LOS standards and assesses impact fees on new residential development to offset the cost of meeting the recreational needs of a growing population. The City of Vancouver adopted population-based standards for park land acquisition and development based on park classification in 1994 (City of Vancouver 2022a).

In 2022, VPRCS published a Park System Comprehensive Plan to analyze existing conditions and identify 10-year goals and metrics. As of 2022, the greatest number of people resided in PIF District C, which is located east of I-205 in the ~~e~~City boundaries. PIF District B, located between Grand Boulevard/Evergreen Boulevard and I-205, and PIF District A, which includes the remaining portion of the ~~e~~City west of District B, had lower levels of population and projected growth than District C.

The City currently provides 4.19 acres of parkland (including urban neighborhood and community parks and urban natural areas) per 1,000 residents citywide, which is less than the City's standard of 6 acres of acquired neighborhood/community parks per 1,000 residents and half of the national median of 10.6 acres per 1,000 residents for comparable sized cities. The City also has a standard of 4.25 acres of developed neighborhood/community parks per 1,000 residents. Citywide, about 372 more acres of park land needs to be acquired and about 383 acres needs to be developed to meet existing LOS standards, as shown in Table 24.

Table 24. Existing (2025) City Parks and Natural Areas Demand, Inventory, and Need by District (in acres)

Park Impact Fee District	Acquisition Demand	Acquisition Inventory	Acquisition Need	Development Demand	Development Inventory	Development Need
A	246.43	217.12	29.31	174.56	124.50	50.05
B	388.10	327.73	60.37	274.91	207.82	67.08
C	600.13	317.33	282.80	425.09	159.52	265.57
Total	1,234.66	862.19	372.47	874.55	491.84	382.71

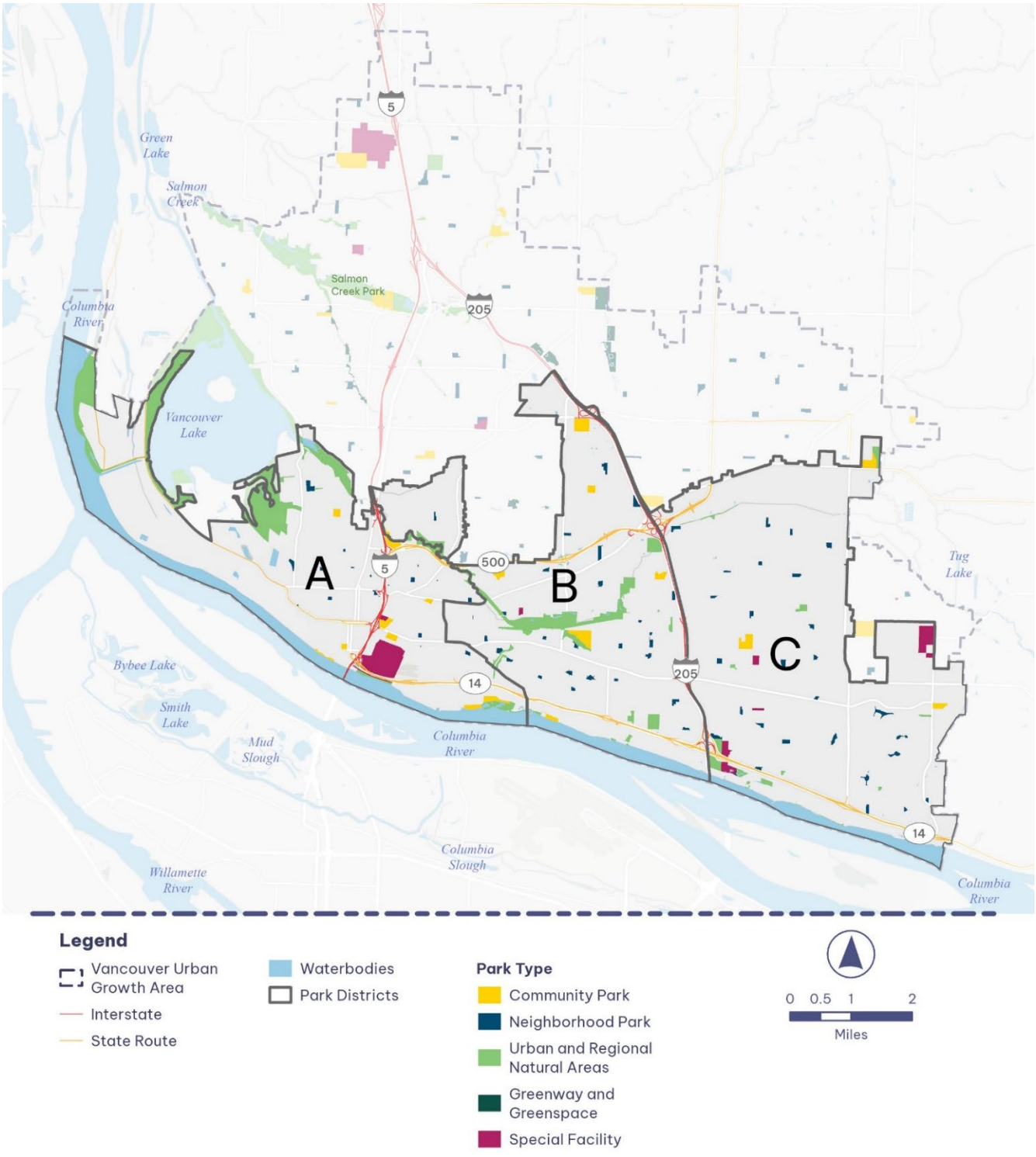
Source: City of Vancouver 2025b

Note: Park Impact Fee District boundaries are shown in Figure 28-Figure 30. Demand calculated based on estimated 2025 population of 41,072 in PIF A, 64,684 in PIF B, and 100,021 in PIF C. Assumes LOS standard of 6 acres per 1,000 residents of acquisition need and 4.25 acres per 1,000 records for park development need. Need is calculated by subtracting the inventory (as of 2025) from the future projected demand.

Most of the park need identified in the Park System Comprehensive Plan is in East Vancouver (District C), as shown in Table 24. Based on the City's Geographic Information System modeling, 75% of all ~~c~~City residents currently live within a 10-minute walking distance (0.5 mile) of park properties; however, 15 parks remain undeveloped.

Residents living east of I-205 have expressed a desire for more parks, while residents living west of I-205 have expressed a need for updated park amenities including benches and trails (City of Vancouver 2022a).

~~Figure 28~~ Figure 30. City Parks by Type and Impact Fee District



Source: City of Vancouver 2024b; Clark County n.d.

Water, Wastewater, and Sewer Services

Potable Water

The potable water system is managed by the City and serves the City as well as the northern portion of the Vancouver Urban Growth Area. As of 2023, the City delivered 10.1 billion gallons of water to more than 270,000 people covering a 72-square-mile-service area (City of Vancouver n.d.[a]). The City operates and maintains an extensive water distribution system, which includes 9 water production stations, 44 wells, 52 booster pumps, more than 1,100 miles of pipes, and more than 80,000 service connections (City of Vancouver n.d.[a]).

Water pressure requirements for the system are determined by the Washington Department of Health, which establishes pressure standards of 30 pounds per square inch (Design Workshop 2024). These standards ensure that adequate water flow is maintained during peak hours when there is high demand. Compliance with these pressure standards is crucial for providing a reliable water supply to the residents.

The National Fire Protection Association (NFPA) also plays a role in ensuring the effectiveness of the water system, particularly in the event of a fire. The NFPA sets guidelines and regulations for the supply, storage, and distribution of water to meet the firefighting needs of the community. Fire flow requirements often determine the minimum size of water lines to ensure an adequate water supply is available for firefighting purposes.

One geographical challenge faced by the water system in Vancouver is the disconnect between the location of the water reservoirs in the southwest and the areas experiencing population growth in the northeast. To maintain the flow of water and meet the increasing demands, the City needs to continuously improve its transmission infrastructure and pumping systems.

Considering the future, the City may need to explore alternative water sources. The Salmon-Washougal and Lewis Watershed Management Plan, published in 2006, recommended sourcing water from the Columbia River instead of relying on flow-limited streams and sensitive aquatic habitats. This suggests that water bodies such as the Vancouver Lake lowlands and the Steigerwald Wildlife Refuge should be protected to ensure their viability as potential water sources (Design Workshop 2024).

Sewer and Wastewater

Sanitary sewer service is provided by the City within the City limits as well as the northern unincorporated area. Clark Regional Wastewater District also serves a small portion of Central Vancouver north of the Vancouver Mall. As of 2023, the City served 244,000 residents covering 58.5 square miles (City of Vancouver n.d.[b]). The sewer system is an extensive network spanning 796 miles of pipe with 43 pump stations (City of Vancouver

n.d.[b]). These pipes transport residential, commercial, and industrial wastewater to two treatment plants: Westside Water Reclamation Facility and Marine Park Water Reclamation Facility. Both of these plants have been recognized for environmental excellence employing advanced processes to treat wastewater and remove pollutants before releasing treated effluent into the Columbia River. Sterilized residual ash from incinerated wastewater solids at the Westside Water Reclamation Facility is transferred to a landfill in Boardman, Oregon.

There are various federal and state standards to ensure the system meets former and future demands. These standards encompass factors such as water quality, air quality, environmental protection, and public health. The City of Vancouver adheres to these standards to ensure the proper functioning and compliance of the entire wastewater system.

Stormwater

Please see the Water section of Chapter 4 for a discussion of the City's existing stormwater system.

Energy Utilities

Efforts to transition to renewable energy sources are underway in the ~~e~~City and region, with roughly 54% of energy used in Vancouver and greater Clark County coming from renewable energy sources (CPU 2024). Clark Public Utilities (CPU) manages and operates electric, generating, and water systems. The Clean Energy Transformation Act commits the state to transition to 100% clean electricity by 2045, which CPU will be assisting and leading this effort. Currently, CPU energy sources include hydropower, natural gas, nuclear electricity, and wind power (CPU 2024).

In 2022, CPU electrical serviced 229,732 customers with 5,554,441 megawatt hours and a peak demand of 1,083 megawatts. Its generating system produced 1,695,596 megawatt hours of electricity (CPU 2022). In their 2024 Integrated Resource Plan, CPU forecast that sufficient energy resources are available to meet customer demand through 2035; however, there is already a deficit in energy capacity, which is expected to grow through 2044 (CPU 2022). CPU determined that it will need to procure new energy resources to continue meeting customer demand for the next 20 years.

NW Natural is the natural gas provider for the ~~e~~City and provides heating and other energy needs to approximately 2.5 million people across Oregon and Southwest Washington. The company serves more than 140 communities through 800,000 meters. In Washington, the typical residential customer uses an average of 57 therms per month (NW Natural 2024). NW Natural is aiming to reach carbon neutrality by 2050 by providing renewable natural gas, introducing clean hydrogen energy, and carbon capture, use and storage. (NW Natural 2024).

Solid Waste

The City's Public Works Department oversees garbage, recycling and organics collection through a contractor, Waste Connections. The City offers a variety of waste and recycling resources to residents including information on hazardous waste removal, recyclables, and composting. The City also offers organics pickup for residents and businesses to help reduce the amount of organic materials going to landfills. This practice is in alignment with the State of Washington's Organics Management Law which is intended to divert 75% of previously disposed organic materials from the landfill by 2030, and rescue 20% of previously disposed edible food for human consumption by 2025.

The City has historically adopted Clark County's Comprehensive Solid Waste Management Plan, which has been updated for the years 2025-2030 and is pending adoption by the Washington State Department of Ecology (Ecology) (Clark County 2025). The plan describes existing conditions and outlines strategies for waste reduction, recycling, organics, moderate risk waste, miscellaneous waste, solid waste collection, transfer and disposal. The plan also discusses funding and financing of capital needs and an implementation schedule with recommendations for each of these areas of the County, including the City of Vancouver.

Columbia Resource Company, a subsidiary of Waste Connections, operates three transfer stations in Clark County (in Central Vancouver, West Vancouver, and Washougal) and is the designated processor of recyclables. These transfer stations charge fees to accept miscellaneous solid waste, organics, and recyclables. Master plans for each facility identify the investments needed to build them out to meet future growth.

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following public services and utilities metrics:

- Increased demand for services/utilities that exceeds levels of service/capabilities beyond mitigatable levels
- Consistency with CIPs
- Proximity of new housing to parks

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections as applicable.

Increased Demand for Services/Utilities Exceeding Levels of Service/Capabilities beyond Mitigatable Levels

New growth is expected to occur under all alternatives; however, the projected capacity for new housing units and jobs and the location of new development would vary under each alternative. Under all alternatives, this future growth would increase the demand for fire and police services; schools; parks and recreation; water, wastewater, and sewer services; energy utilities, and solid waste services.

This increased demand could result in the need for new staff, equipment, and/or infrastructure under all alternatives. The pace and location of future development and corresponding demands on public services and utilities would be influenced in part by the implementation of the current (No Action) or proposed (Alternatives 1 or 2 or Preferred Alternative) Comprehensive Plan policies, related regulations and actions, and by decisions made by individual property owners and developers.

Fire

Under all alternatives, growth and development would lead to increased demand for VFD fire and EMS services, which could make it more challenging for VFD to meet its response time standards. Ability to meet response time standards is influenced by the proximity of the alarm to VFD's stations, staff availability, mobility and traffic, population density, and quantity of fire apparatus at each station. Additional staff, equipment, and potentially new fire stations may be needed to meet response time standards.

This growth would occur incrementally under all alternatives as population increases. The extent of these needs would vary by alternative, as discussed in the following subsections.

Under the action alternatives, the City may need to re-evaluate staffing levels and equipment at specific fire stations located closest to areas that would allow for greater density of housing units and associated population growth, including Station 1 in West Vancouver north of downtown, Stations 2 and 3 in Central Vancouver and Stations 6, 8, 9 and 10 in East Vancouver.

Table 25 shows the estimated number of firefighters that would be needed for each alternative to maintain existing levels of service (currently 0.83 firefighters per 1,000 people), based on the number of estimated new residents associated with the new housing unit capacity in 2045. East Vancouver would have the highest needs for new firefighters under all alternatives because it would have the highest capacity for new housing units, followed by Central Vancouver and West Vancouver. However, because the Preferred Alternative would distribute the capacity for new housing units more evenly throughout the City than Alternatives 1 and 2, there would be relatively more demand for new firefighters in West and

Central Vancouver and less demand for new firefighters in East Vancouver. ~~Demand for new firefighters in West Vancouver would be similar across all alternatives, and demand for new firefighters in Central Vancouver would be similar between the No Action Alternative and Alternative 2~~.

Table 25. Estimated Number of New Firefighters Needed by Alternative and Area of City

Geographic Area of City	No Action Alternative[a]	Alternative 1	Alternative 2	Preferred Alternative
West Vancouver	5	5	4	9
Central Vancouver	24	15	23	28
East Vancouver	27	66	70	48
Total	**56**	**86**	**97**	**84**

Notes:
The estimated firefighter need under the alternatives was estimated as follows: 1) multiplying the total projected number of new housing units in each area of the City by 2.3, which is the assumed average number of persons per household from the Our Vancouver Housing Needs Assessment (ECONorthwest 2024b), to derive the estimated new population in each area. 2) Dividing the total population for each area by 1,000 and multiplying by .83, which is the number of firefighters per 1,000 people that VFD has identified to maintain current service levels into the future. Totals may be affected by rounding.

a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Police

Under all alternatives, projected residential and employment growth would increase demand for VPD services. This growth would occur incrementally under all alternatives as population increases. The extent of these needs would vary by alternative, as discussed in the following subsections. VPD would need to re-evaluate staffing levels and equipment within both the east and west precincts to accommodate future demand, as it has already identified that these facilities are at capacity under existing conditions.

Table 26 shows the estimated number of new police officers that would be needed for each alternative by 2045, based on the number of estimated new residents associated with the new housing unit capacity, to meet VPD's goal of 1.4 officers per 1,000 people. East Vancouver would have the highest needs for new police officers under all alternatives, followed by Central Vancouver and West Vancouver. However, because the Preferred Alternative would distribute the capacity for new housing units more evenly throughout the City than Alternatives 1 and 2, there would be relatively more demand for new police officers in West and Central Vancouver and less demand for new firefighters in East Vancouver.

Table 26. Estimated Number of New Police Officers Needed by Alternative and Area of City

Geographic Area of City	No Action Alternative[a]	Alternative 1	Alternative 2	Preferred Alternative
West Vancouver	9	8	6	15
Central Vancouver	40	26	39	47
East Vancouver	46	111	118	81
Total	95	145	163	142

Notes:
The projected police officer need under the alternatives was estimated as follows: 1) multiplying the total projected number of new housing units in each area of the City by 2.3, which is the assumed average number of persons per household from the Our Vancouver Housing Needs Assessment (ECONorthwest 2024b), to derive the estimated new population in each area. 2) Dividing the total population for each area by 1,000 and multiplying by 1.4, which is the number of police officers per 1,000 people that VPD has identified as their service goal for the future. Totals may be affected by rounding.

a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Schools

All alternatives would have the potential to increase the number of new students in both VPS and Evergreen SD schools, as continued population growth under all alternatives is assumed to include school-aged children. This growth would occur incrementally under all alternatives.

Table 27 summarizes the projected number of future new students for each school district under each alternative in 2045 based on the estimated capacity for housing units and associated new school-age population. There would be more projected new students in areas served by Evergreen SD than VPS under ~~both~~ all action alternatives because more growth is forecast to occur within the Evergreen SD service area (primarily East Vancouver). Both school districts would need to account for this projected growth as part of their CFP planning processes and identify potential capacity issues. However, because the Preferred Alternative would distribute the capacity for new housing units more evenly throughout the City than Alternatives 1 and 2, the number of projected new students under the Preferred Alternative would be more similar between VPD and ESD than under Alternatives 1 and 2.

Table 27. Future Projected New Students based on New Housing Unit Capacity by Alternative

School Level	VPS No Action[a] Alt	ESD No Action[a] Alt	VPS Alt 1	ESD Alt 1	VPS Alt 2	ESD Alt 2	VPS Pref Alt	ESD Pref Alt
Elementary School (K-5)	1,343	1,311	744	2,843	955	3,062	1,732	1,986
Middle School (6-8)	593	592	328	1,283	421	1,382	764	896
High School (9-12)	739	765	409	1,658	525	1,786	953	1,158
Total	2,675	2,668	1,481	5,783	1,901	6,230	3,449	4,040

Notes:
The number of projected new students under the alternatives was estimated by multiplying the projected capacity for new housing units in each school district by the average student generation rate numbers for each school level within each district. All alternatives assume 10% of new housing capacity would be single-family, and 90% of new housing capacity would be multifamily units.
a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.
Key: VPS = Vancouver Public School District; ESD = Evergreen School District

Parks and Recreation

None of the alternatives would have direct impacts on existing parks or change the amount of land designated as Parks/Open Space land use. Residential growth under all of the alternatives would increase the demand on the city's existing parks and recreational areas. This growth would occur incrementally under all alternatives as population increases.

As noted in the Affected Environment section for Parks and Recreation, the City does not currently meet its LOS standard of 6 acres of acquired neighborhood/community parks and 4.25 acres of developed neighborhood/community parks per 1,000 residents. That LOS is projected to decline to about 3.1 acres per 1,000 residents citywide under all alternatives based on 2045 OFM population growth projections.

Table 28 shows the projected park acquisition and development acreage demand, inventory, and needs in each district and citywide in 2045 based on the OFM estimates of total future population. With no change to the amount of parks inventory by 2045, the park land deficit would increase to about 824 acres of new park land that would need to be acquired and

about 702 acres of park land that would need to be developed citywide. The largest need would be in PIF C, where the highest population growth is projected.

Table 28. Future (2045) City Parks and Natural Areas Demand, Inventory, and Need by District (in acres)

Park Impact Fee District[a]	Acquisition Demand[b]	Acquisition Inventory	Acquisition Need	Development Demand[b]	Development Inventory	Development Need
A	333.54	217.12	119.42	238.38	124.50	113.88
B	529.97	327.73	202.23	375.39	207.82	167.57
C	819.49	317.33	502.16	580.47	159.52	420.96
Total	**1,686.00**	**862.19**	**823.81**	**1,194.25**	**491.84**	**702.41**

Source: City of Vancouver 2025b

Notes:

a Park Impact Fee District boundaries are shown in ~~Figure 28~~ Figure 28-Figure 30.

b Demand calculated based on estimated 2045 population of 56,090 in PIF A, 88,328 in PIF B, and 136,582 in PIF C, for a total population of 281,000 citywide. Assumes LOS standard of 6 acres per 1,000 residents of acquisition need and 4.25 acres per 1,000 records for park development need. Need is calculated by subtracting the inventory (as of 2025) from the future projected demand. Note: These citywide projections assume that the 2045 population distribution would be similar to the 2025 population distribution. The projections do not account for differences between the alternatives in housing capacity distribution by PIF district. The next paragraphs and table discuss potential park needs based on new housing capacity for each future alternative, including an analysis of new housing capacity by PIF district.

As noted in the Land and Shoreline Use section of Chapter 3, although the same 2045 population is projected under all of the alternatives, the pace and distribution of new housing capacity and associated growth would vary among the alternatives. Table 29 shows the estimated amount of new park acreage that would need to be acquired and developed under each alternative to meet the current urban parks and natural areas LOS standards based on the estimated 2045 capacity for new housing units and associated new residents.

Under all alternatives, PIF District C would have the largest need for park land acquisition and development because it is projected to have the highest capacity for new growth. The No Action Alternative would have the lowest overall parks need because it would have the lowest projected level of population growth based on capacity for new housing units. Alternative 1, ~~and~~ Alternative 2, and the Preferred Alternative would have higher needs than the No Action Alternative because of their higher levels of projected new housing units and associated residents.

Table 29. Projected Park Land Demand by Park Impact Fee District and Alternative (in acres)

Alternative and Park Demand Type	Park Impact Fee District[a] A	Park Impact Fee District[a] B	Park Impact Fee District[a] C	Total
No Action Alternative[b]: New Park Acquisition Demand[c]	76	134	199	**408**
No Action Alternative[b]: New Park Development Demand[c]	54	95	141	**289**
Alternative 1: New Park Acquisition Demand[c]	75	70	477	**622**
Alternative 1: New Park Development Demand[d]	53	50	338	**441**
Alternative 2: New Park Acquisition Demand[c]	65	126	509	**700**
Alternative 2: New Park Development Demand[d]	46	89	361	**496**
Preferred Alternative: New Park Acquisition Demand[c]	77	184	348	**609**
Preferred Alternative: New Park Development Demand[d]	55	130	246	**431**

This table was reformatted from the DEIS to fit better on the page (refer to strikeout table below for previous version). The demand amounts for the No Action, Alternative 1, and Alternative 2 are unchanged from the Draft EIS. The demand amounts for the Preferred Alternative are added to this table.

a Park Impact Fee District boundaries are shown in ~~Figure 28~~ Figure 28-Figure 30.

b The No Action Alternative is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

~~b~~ c The acreage of park acquisition demand under the alternatives was estimated as follows: 1) multiplying the total projected number of new housing units in each Park Impact Fee district by 2.3, which is the assumed average number of persons per household from the Our Vancouver Housing Needs Assessment (ECONorthwest 2024b), to derive the estimated new population in each PIF district. 2) Dividing the estimated new population by 1,000 and multiplying the resulting number by 6, based on the City's goal of 6 acres per 1,000 residents, to calculate the estimated acreage demand for this new population. Totals may be affected by rounding.

~~c The No Action Alternative is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.~~

d The acreage of park development demand under the alternatives was estimated as follows: 1) multiplying the total projected number of new housing units in each Park Impact Fee district by 2.3, which is the assumed average number of persons per household from the Our Vancouver Housing Needs Assessment (ECONorthwest 2024b), to derive the estimated new population in each PIF district. 2) Dividing the estimated new population by 1,000 and multiplying the resulting number by 4.25, based on the City's goal of 4.25 acres of developed

neighborhood/community parks per 1,000 residents, to calculate the estimated acreage demand for this new population. Totals may be affected by rounding.

~~Park Impact Fee District[a]~~	~~New Park Acquisition Demand[b] for No Action Alternative[c]~~	~~New Park Development Demand[b] for No Action Alternative[c]~~	~~New Park Acquisition Demand[b] for Alternative 1~~	~~New Park Development Demand[b] for Alternative 1~~	~~New Park Acquisition Demand[b] for Alternative 2~~	~~New Park Development Demand[b] for Alternative 2~~
~~A~~	~~76~~	~~54~~	~~75~~	~~53~~	~~65~~	~~46~~
~~B~~	~~134~~	~~95~~	~~70~~	~~50~~	~~126~~	~~89~~
~~C~~	~~199~~	~~141~~	~~477~~	~~338~~	~~509~~	~~361~~
~~Total~~	~~408~~	~~289~~	~~622~~	~~441~~	~~700~~	~~496~~

Water, Wastewater and Sewer Services

All alternatives would create an increase in water and sewer demand to varying extents because of expected new population and employment growth. Increased water demand may increase stress on the city's potable water system, including maintaining applicable water pressure standards. Under all alternatives, the projected City growth may require water system improvements to increase the fire flow to meet current standards.

Development of any of the alternatives to accommodate projected residential and job growth would result in greater demands on the City's sewer and wastewater collection system and on downstream conveyance and treatment facilities. This new growth and development may require additional wastewater and sewer infrastructure investments and implementation, as well as associated staff and equipment, to meet new demand.

Energy Utilities

New residential, commercial and industrial development across all alternatives would result in additional energy utility demand and use. Under all alternatives, energy providers would need to coordinate with the City to ensure their respective future infrastructure planning is consistent with the city's projected growth through 2045. Specific proposed projects under all alternatives would need to demonstrate that there are adequate energy sources to support their development. As noted in the Affected Environment section, CPU has already identified a potential future energy deficit and is identifying sources for additional energy needs.

Solid Waste

All alternatives would result in increases to population density and new residential and commercial development, which would increase demand for garbage, recycling, and organics collection in areas where this growth occurs. These changes would be more pronounced under the action alternatives, where existing solid waste collection systems and practices would need to be evaluated and modified to account for new, denser development patterns in more areas of the city.

Consistency with Capital Improvement Plans

None of the alternatives in themselves would be inconsistent with capital improvement planning efforts. However, all of the alternatives would accommodate varying levels of population and employment growth, which could lead to inconsistencies with CIPs if coordination with relevant City departments, school districts, and private utilities does not occur. All of the alternatives would require ongoing coordination with these entities as they undergo their regular capital improvement planning efforts, as described in the Avoidance, Minimization, and Mitigation Measures section.

No Action Alternative

Increased Demand for Services/Utilities Exceeding Levels of Service/Capabilities beyond Mitigatable Levels

Overall, the No Action Alternative would result in the lowest increase in future demand for most public services and utilities because it would continue existing lower-density development throughout the ~~e~~City and would have capacity for the lowest levels of new growth in housing units and jobs. This difference would be most pronounced in East Vancouver, which would have the lowest estimated capacity for new housing units and therefore the least demand for new police officers, firefighters, and parks, and in the Evergreen SD, which would have the lowest projected new student generation rate compared to the ~~two~~ three action alternatives.

However, the No Action Alternative could encourage continuation of a less dense, more dispersed style of urban development. In the longer term, cumulative impacts associated with this type of development pattern could include inefficient and more costly delivery of some public services, such as police, fire, and schools, compared to Alternatives 1 and 2 and the Preferred Alternative. No additional impacts were identified for the No Action Alternative related to increased demand for individual public services and utilities or consistency with CIPs, beyond those discussed in the Impacts Common to All Alternatives section.

Consistency with Capital Improvement Plans

No additional impacts were identified for the No Action Alternative related to consistency with CIPs, beyond those discussed in the Impacts Common to All Alternatives section.

Alternative 1

Increased Demand for Services/Utilities Exceeding Levels of Service/Capabilities beyond Mitigatable Levels

Based on projected new housing units and jobs, as described in Chapter 2, Alternative 1 would create more demand for public services and utilities citywide than the No Action Alternative, slightly more demand compared to the Preferred Alternative, and ~~but~~ modestly less demand than Alternative 2. Because the Comprehensive Plan Update land use designations would promote denser, more compact development patterns in more areas of the ~~c~~City over time under Alternative 1, cumulative benefits could potentially include greater efficiencies in the delivery of some public services, such as police, fire, and schools, compared to the No Action Alternative. Similar to the No Action Alternative, specific impacts to public services and utilities would be dependent upon the location of future development.

Areas with larger proposed higher-density zoning districts and higher capacity for new housing units would have increased demand for utilities, including waste, wastewater, sewer, energy, and solid waste, which may require greater investments in new infrastructure and associated staff and equipment compared to the No Action Alternative. Areas with potentially higher demand under Alternative 1 would include parts of West Vancouver just north of downtown, in Central Vancouver along East Mill Plain Boulevard and near the Vancouver Mall, and in East Vancouver along Mill Plain Boulevard, 164th Avenue, and 192nd Avenue and in the Section 30 area. Required infrastructure changes could include installing larger water and sewer collection pipes and identifying new methods and approaches for solid waste collection to accommodate denser housing types.

Consistency with Capital Improvement Plans

No additional impacts were identified for Alternative 1 related to consistency with CIPs, beyond those discussed in the Impacts Common to All Alternatives section.

Alternative 2

Increased Demand for Services/Utilities Exceeding Levels of Service/Capabilities beyond Mitigatable Levels

Alternative 2 would result in the highest increase in future demand for public services and utilities compared to the other alternatives. Because the Comprehensive Plan Update land use designations would promote denser, more compact development patterns in the most areas of the City under Alternative 2, cumulative benefits could include greater efficiencies in the delivery of some public services, such as police, fire, and schools, compared to the other alternatives. Similar to Alternative 1 and the Preferred Alternative, areas with larger proposed higher-density zoning districts and higher capacity for new housing units would have

increased demand for public services and utilities that may require additional infrastructure, staff, and equipment to serve.

These locations and associated needs would be similar to Alternative 1 and the Preferred Alternative but would cover more extensive amounts of land, including in West Vancouver adjacent to and north of downtown, in Central Vancouver along East Mill Plain Boulevard and near the Vancouver Mall, and in East Vancouver along Mill Plain Boulevard, 164th Avenue, and 192nd Avenue and in the Section 30 area.

Consistency with Capital Improvement Plans

No additional impacts were identified for Alternative 2 related to consistency with CIPs, beyond those discussed in the Impacts Common to All Alternatives section.

Preferred Alternative

Increased Demand for Services/Utilities Exceeding Levels of Service/Capabilities beyond Mitigatable Levels

Based on projected new housing units and jobs, as described in Chapter 2, the Preferred Alternative would create more demand for public services and utilities citywide than the No Action Alternative, and modestly less demand than Alternatives 1 and 2 depending on area of the city.

Because the Comprehensive Plan Update land use designations would promote denser, more compact development patterns in more areas of the City over time under the Preferred Alternative, cumulative benefits could potentially include greater efficiencies in the delivery of some public services, such as police, fire, and schools, compared to the No Action Alternative. Similar to Alternatives 1 and 2, areas with larger proposed higher-density zoning districts and higher capacity for new housing units would have increased demand for public services and utilities that may require additional infrastructure, staff, and equipment to serve.

The locations and associated needs would be similar to Alternative 2, including in West Vancouver adjacent to and north of downtown (more Medium Scale Neighborhood similar to Alternative 2), in Central Vancouver along East Mill Plain Boulevard and near the Vancouver Mall (more Medium Scale Neighborhood, Mixed Use and Regional Activity Center, similar to Alternative 2), and in East Vancouver along Mill Plain Boulevard, 164th Avenue, and 192nd Avenue and in the Section 30 area (more Mixed Use and Regional Activity Center, similar to Alternative 2). However, because the Preferred Alternative would distribute the capacity for new housing units more evenly between West, Central and East Vancouver, there would be relatively more demand for public services and utilities in West and Central Vancouver and less demand in East Vancouver than under Alternatives 1 and 2.

Consistency with Capital Improvement Plans

No additional impacts were identified for the Preferred Alternative related to consistency with CIPs, beyond those discussed in the Impacts Common to All Alternatives section.

Avoidance, Minimization, and Mitigation Measures

Under all alternatives, future growth and associated increased demand for public services and utilities would be addressed as part of the City's regular capital project planning efforts. Long-term planning for these facilities consistent with the Capital Facilities Element, other city functional plans, and service provider plans will help ensure that public services and utilities are provided adequately under each alternative and meet applicable LOS standards. The school districts would continue to address changes in student enrollment through their individual planning processes.

Specific avoidance, minimization, and mitigation measures could include the following:

- The Comprehensive Plan Update promotes a more compact growth and development pattern within the existing urban framework of the City, which could reduce growth in outlying areas and result in a more efficient delivery of some public services and utilities.
- Increases in population and employment resulting from the implementation of the Comprehensive Plan Update will be reviewed annually as part of department performance evaluations and capital planning for all public services and facilities.
- Future development resulting from implementation of the Comprehensive Plan Update will be required to comply with the most current versions of the International Fire Code, the International Building Code, and Washington Department of Health and City municipal codes that require maintaining health and safety and utility service performance.
- Future development resulting from implementation of the Comprehensive Plan Update will result in additional tax revenues from construction and retail sales tax, property tax, utility tax, licenses and permits, utility ratepayer fees and system development charges, and school and PIFs. A portion of these taxes and fees will accrue to the City to offset costs associated with the increase in demand for public services and facilities.
- VPRCS will continue to explore opportunities to develop new parks, open space, and recreation facilities, especially in portions of the City with access gaps to meet LOS standards. VPRCS will also continue to work closely with the City's Transportation Department to plan and create opportunities for parks. The City's periodic updates to its Park System Comprehensive Plan would need to account for increased population and associated need for parks and recreation spaces under all the alternatives. The City collects PIFs per unit pursuant to VMC 20.915.050 by year at an increasing sliding scale value and unit type (single-family or multifamily). To fund additional parks acquisitions

and development, the City could consider changes to its impact fee structure and explore new funding sources. Other potential mitigation measures related to parks include:

  - Subarea planning to provide a comprehensive evaluation of infrastructure needs, efficient planning to serve potential growth. Related to parks in particular, this includes the identification of a centralize park focus location based on the unique resources and setting, and interconnection to serve multiple property owners and future developments/redevelopments.
  - Development code requirements for buffers between parks and adjoining land uses to minimize impacts to park resources, as well as publicly accessible open space within new developments.
  - Maximize multi-use of resources properties where compatible, such as park natural areas and stormwater properties; utility easements adopted to accommodate public access to public spaces and cross circulation.
  - Require pedestrian-level grid to facilitate interconnection at reasonable spacing standard between developments within institutional campus areas and high-density developments and existing or new parks and trails.
  - Density transfers or cluster-type development such as increased building height to preserve a signature tree, grove or grassland to protect nature resources and provide access to natural spaces.
  - Continue to use late-comer agreements for infrastructure locations.
  - Improve project development review and construction review to ensure pedestrian interconnection and resource protection, as well as identification of opportunities to locate needed public assets. Additional staffing is needed, or at minimum cross training for staffing efficiencies.

- The City uses a hydraulic network model to evaluate capacity and make determinations of water availability. Capital projects to address potential increased demand resulting from the action alternatives will be included in periodic updates to the Water, Wastewater, Surface Water CIP. Any additional gaps in the water system that result from future development will be addressed through development review. Developers are required to upgrade the existing system to meet demand of individual projects. Additionally, new development and redevelopment is required by the plumbing code to include efficient plumbing fixtures, which would reduce the overall impact to water demand resulting from the action alternatives. New development and redevelopment would also need to comply with current stormwater regulations to be approved.
- The City uses a General Sewer Plan and its CIP to track if there is adequate wastewater collections and treatment infrastructure and show capacity needs. The City would need to ensure that safe wastewater services is provided to all households in order to protect

the community's health and wellbeing. Additionally, the City would utilize the General Sewer Plan to ensure the system meets federal and state standards such as water quality, environment protection and public health.

- The City's Water, Wastewater, Surface Water CIP identifies a number of drinking water, wastewater, and surface water projects and efforts that would help prepare the Ccity for future planned growth and development under all alternatives, including:
    - Capital programs focused on rehabilitation and/or replacement of worn and obsolete water treatment facilities.
    - Capital programs focused on rehabilitation and/or replacement of worn and obsolete equipment at wastewater infrastructure.
    - Ongoing upgrade and replacement of water and wastewater collections infrastructure throughout their respective systems that have been identified as high risk and/or high maintenance
    - Production well replacement projects at multiple water stations to improve reliability.
    - Ongoing installation of transmission mains to move water from high production sources to areas of development.
    - Electrical equipment replacement at water production stations and wastewater pump stations and treatment facilities.
    - Multiple projects to improve treatment performance and capacity at Marine Park and Westside wastewater treatment facilities.
    - Ongoing individual projects within the Sewer Connection Incentive Program designed to bring more reliable wastewater collections infrastructure to properties.

- CPU will continue to evaluate efficiency measures and the need for new energy resources to continue meeting customer demand for the next 20 years.
- Clark County will continue to evaluate solid waste capital improvement needs as part of periodic updates to its Comprehensive Solid Waste Management Plan.

In addition, implementation of the following goals and policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential impacts to public services and utilities identified for the action alternatives:

- Provide high-quality public facilities, services, and utilities that are affordable, efficient, well maintained, advance climate goals, and meet the needs of a growing population.
    - Coordinate with the VFD and VPD to plan for expected growth, provide adequate facilities to equitably serve the community, and maintain the established levels of

service. Communicate with service providers when planning transportation projects that may affect emergency vehicle access.

- Support public safety through investment in emergency services, facilities, infrastructure and coordinated preparedness efforts that strengthen community resilience and response.
- Work with local school districts to facilitate an adequate supply of schools and associated facilities. Facilitate timely and efficient siting processes which allow for assessment and mitigation of impacts.
- Establish multipurpose community centers offering social, recreational, educational, and cultural programming, especially in underserved areas.
- Prioritize programs and infrastructure that support youth and aging populations, including safe play areas, accessible housing, robust childcare, public facilities and community programs that foster multigenerational interaction.
- Encourage the use of short-term pilot projects for park, transportation, and infrastructure improvements before making long-term investments to foster innovation, test feasibility, and increase community buy-in.
- Create a network of linear parks that encourage active transportation, improve community health and wellbeing, enhance tree canopy and stormwater management, and link parks and open space with housing.
- Expand access to community gardens and incentivize urban agriculture to improve food security and increase healthy food options.
- Work with nonprofit and private partners, Clark County, and adjacent cities to build out the regional trail network for recreation and active transportation purposes.
- Provide safe, clean, quality drinking water to every Vancouver home, business, and industry. Discourage development and use of private drinking water wells. Provide water pressures and volumes necessary to support fire suppression hydrants and sprinkler systems. Ensure that the infrastructure to support water service is in place prior to or at the time of development. Support self-sustaining on-site water ~~conservation recycle~~ reuse systems where practicable.
- Encourage water-efficient technologies and practices, reuse systems, and conservation programs to reduce consumption and ensure sustainable water availability amid climate change and growing demand.
- Provide sewers and sewer service to every Vancouver home, business, and industry at an affordable and equitable cost. ~~Discourage~~ Prohibit development and use of on-site sewage treatment systems. Encourage existing development using septic systems to connect to public sewer as soon as available. Ensure that the infrastructure to support sewer service is in place prior to or at the time of development. Eliminate health hazards from domestic and industrial wastewater and return clean water to the environment.

  - Encourage new renewable energy infrastructure and promote development of storage systems to ensure a stable, resilient, and sustainable energy grid.
  - Increase waste diversion rates through a system that minimizes landfill reliance, reduces greenhouse gas emissions, prioritizes composting and encourages resource recovery. Properly ensure waste that cannot be recycled is diverted to landfills.
  - Use green materials and practices when procuring materials and services, and while carrying out maintenance functions. Employ materials transformation and reuse programs from Ceity activities (i.e., turning woody debris into mulch or soil amendments).

- Consider water, sewer, stormwater management, solid waste, police, fire and schools as necessary public facilities and services. Ensure that facilities are sufficient to support planned development. Establish service standards or planning assumptions for estimating needed public facilities, based on service capabilities, local land use designations and nationally recognized standards.
- Plan, site, and design essential public facilities through coordinated, equitable, and transparent processes that support regional planning goals, minimize community impacts, and ensure long-term benefit to all Vancouver residents.
- Assure consistency of overall land use and CFPs by reevaluating Vancouver's land use plan if funding is inadequate to provide necessary public facilities and services to implement the plan.
- Maintain a prioritization process that aligns CIP projects to the goals and policies of the Comprehensive Plan. Use the CIP, as amended annually, to prioritize the financing of capital facilities within projected funding capacities and ensure that capital budget decisions conform with the Comprehensive Plan.
- Provide safe infrastructure that remains functional during disruptive natural and manmade events, maintain access for emergency vehicles and services, and ~~support responsive, equipped and community led fire and police departments~~ ensure efficient and responsive emergency services.
- Ensure impact fees and system development charges and utility rates are proportional to development scale, ensuring affordability for smaller projects while allowing the Ceity to recover costs from overall development impacts on resources and services.
- Expand access to municipal and community-based services and amenities by prioritizing investment in underserved areas. Utilize the City's Equity Index, ~~and~~ Displacement Risk Assessment tool and climate vulnerability assessment to guide public investments and infrastructure improvements. Prioritize infrastructure improvements using risk and resiliency criteria as well as economic value.

- Design and maintain infrastructure to reduce long-term maintenance costs per capita and per trip traveled. Consider life cycle costs, emerging technologies, and the impacts of facility design and material choices in both capital and operating budgets.

Significant Unavoidable Adverse Impacts

All alternatives have the potential to increase demand on public services and utilities as a result of expected population and job growth and development. The anticipated growth would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to public services and utilities are anticipated for any of the alternatives.

Chapter 4: Natural Environment

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. New content in this chapter is generally denoted with underlined text, while changes to information are denoted with strikethrough text. Updates focus on adding the new analysis of the Preferred Alternative, as well as minor corrections and clarifications to the analysis presented in the Draft EIS. Some changes are denoted with footnotes and table notes when further explanation was warranted.

This chapter describes the methodologies, existing conditions (affected environment), and potential impacts of the alternatives for the following environmental topic areas related to the natural environment: earth, air quality, water, and plants and animals.

For each topic, the chapter also provides a summary of potential avoidance, minimization, and mitigation measures to address potential impacts and identifies impacts that are considered to be significant and unavoidable under SEPA.

Earth

Methodology

Analysts reviewed relevant information and policies to describe existing conditions related to topography, soils, and geologic hazard areas including the following sources:

- Community Atlas (Design Workshop 2024)
- Clark County geologic maps (Clark County n.d.)
- U.S. Department of Agriculture Web Soil Survey (USDA NRCS 2001)
- U.S. Geological Survey geologic maps (USGS 2024)
- VMC Critical Areas Ordinance, Chapters 14.26 and 20.740, including 20.740.130, Geologic Hazard Areas
- Washington Department of Natural Resources geologic maps (WDNR 2014, 2023)

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Consistency with City regulations for geologic hazard areas (VMC 20.740.130)
- Potential for increased exposure to geologic hazard risks at existing and future development sites
- Potential for increased risk of erosion at future development sites

Affected Environment

Topography and Geologic Features

The Columbia River and ancient glacial flooding have sculpted much of Vancouver's landscape by depositing clay, silt, sand and gravel onto its banks over tens of thousands of years (City of Vancouver 2021a). The City is generally flat or terraced, but there are steep slopes along portions of the Columbia River, Burnt Bridge Creek and Vancouver Lake.

Sites with steep slopes may be more difficult to develop due to possible instability, erosion or drainage challenges. Approximately 20% of the City has a slope above 5%. Slopes of around 5% to 25% are highly prevalent on the southeast side of Vancouver adjacent to the Columbia River. Slopes of 25% or more, which are defined in the City code as landslide and erosion areas, are prevalent closer to the center of the City, as shown in ~~Figure 29 Figure 29~~ Figure 31.

Gravel pits are located sporadically throughout the City but are highly prevalent on the east side of Vancouver alongside steep slopes (above 25%) and mines, as shown in ~~Figure 29 Figure 29~~ Figure 31.

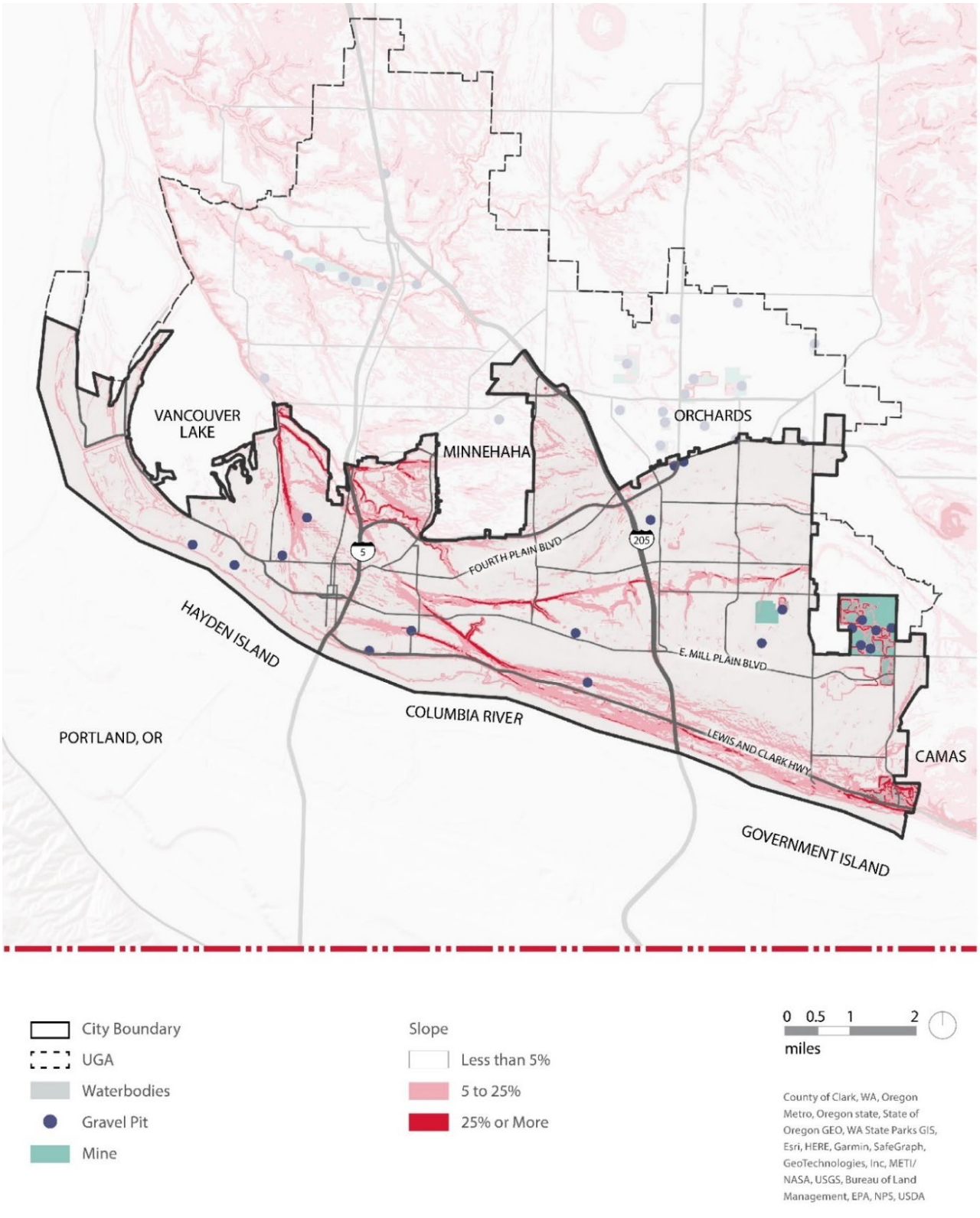
Geologic Hazard Areas

Vancouver is vulnerable to geologic hazards such as erosion, landslides, seismic hazards (earthquakes and ground shaking), and volcanic activity (City of Vancouver 2022a; WDNR 2024).

Erosion hazard areas in Vancouver are lands underlain by soils identified by the U.S. Department of Agriculture Natural Resource Conservation Service as having "severe" or "very severe" erosional hazards including, the following groups of soils when they occur on slopes of 15% or greater: Hillsboro series, Larchmount series, Lauren series, Olympic series, and Wind River series (USDA NRCS 2001). The most severe erosion hazards within the C~~e~~ity primarily occur along the north bank of Lake River leading into Vancouver Lake, the northeast shore of Vancouver Lake, and along both sides of Burnt Bridge Creek Park (Clark County n.d.). ~~Figure 30 Figure 30~~ Figure 32 shows the locations of identified severe erosion hazard areas.

Landslide hazard areas are defined as those with slopes greater than 25%, excluding engineered slopes, and areas of historic or active landslides, potential instability, or older landslide debris (VMC 20.740.130). Areas of severe landslide hazard generally follow the north side of Lake River and occur in isolated areas throughout North and Central Vancouver (USGS 2024). ~~Figure 31 Figure 31~~ Figure 33 shows the location of landslide hazards, including active and potential unstable slopes.

~~Figure 29~~ Figure 31. Steep Slopes, Gravel Pits, and Mines



Source: Design Workshop 2024

~~Figure 30~~ Figure 32. Severe Erosion Hazard Areas



Source: Clark County n.d.

~~Figure 31~~ Figure 33. Landslide Hazard Areas



Source: Clark County n.d.

Vancouver contains a range of seismic hazards. Hazards from earthquakes include liquefaction, ground shaking, slope failure, and fault rupture (VMC 20.740.130). The Lacamas Lake Fault occurs in East Vancouver, running northwest to southeast from SR 500 to the Columbia River (WDNR 2014). Areas with the greatest relative seismic hazard are located along the Columbia River in southwest Vancouver north toward Vancouver Lake. Areas with

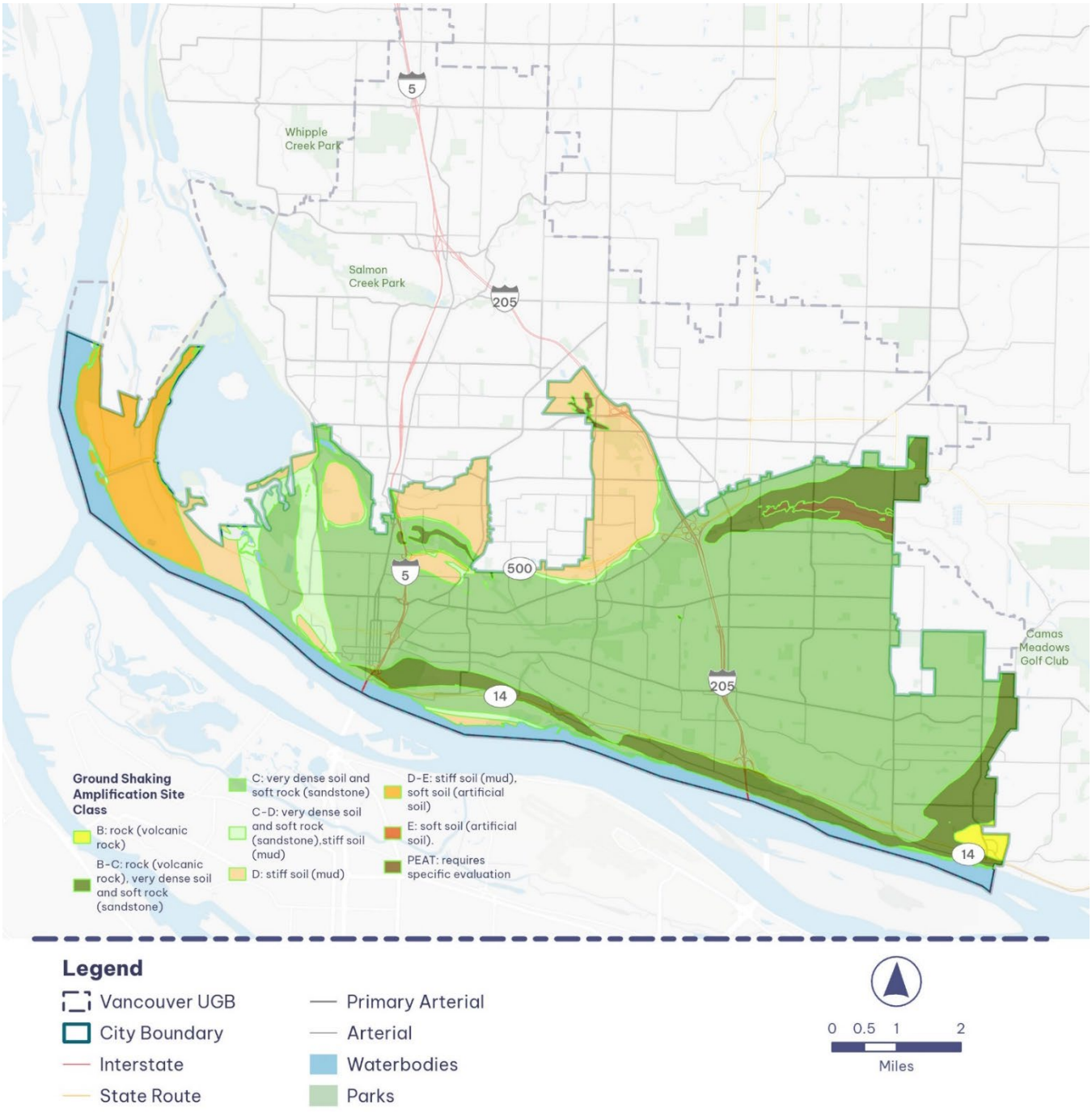
moderate to least relative seismic hazard are located throughout Central and East Vancouver. There is an additional band of greater relative risk at and north of SR 500. Liquefaction susceptibility hazards are "low to moderate" in the majority of the city, with a small band of "very low" along the Columbia River. Liquefaction hazards are mapped as "moderate to high" surrounding Vancouver Lake (WDNR 2024).

Seismic hazard areas in Vancouver include ground shaking amplification hazard areas. Ground shaking amplification is a phenomenon where surface-level shaking during an earthquake can be more intense based on local soil conditions. For example, when seismic waves travel through softer soils that vibrate more intensely than harder bedrock, there can be greater shaking at the surface.

Ground shaking amplification site class is determined by the National Earthquake Reduction Program of the Federal Emergency Management Agency. Ground Shaking amplification and earthquake damage risk is lowest with Site Class A soils and highest with Class F soils. VMC 20.740.130 designates ground shaking amplification hazard areas as Site Classes C to D, D, D to E, E and F as indicated on the Site Class Map of Clark County, Washington. The City is mostly classified as Site Class D (moderate), with some areas in north Vancouver classified as Site Class C to D (low to moderate), and areas in West Vancouver classified as Site Class D and D to E (moderate), as shown in ~~Figure 32 Figure 32~~ Figure 34 (Clark County n.d.).

Vancouver is within a volcanic hazard zone due to the proximity of Mount Saint Helens to the north, Mount Adams to the northeast, and Mount Hood to the southeast. The Washington State Department of Natural Resources has identified that Vancouver exists within areas of regional lava flows from Mount Saint Helens and Mount Adams (WDNR 2023).

~~Figure 32~~ Figure 34. Earthquake Hazards, Liquefaction Areas, and Volcanic Hazard Zones



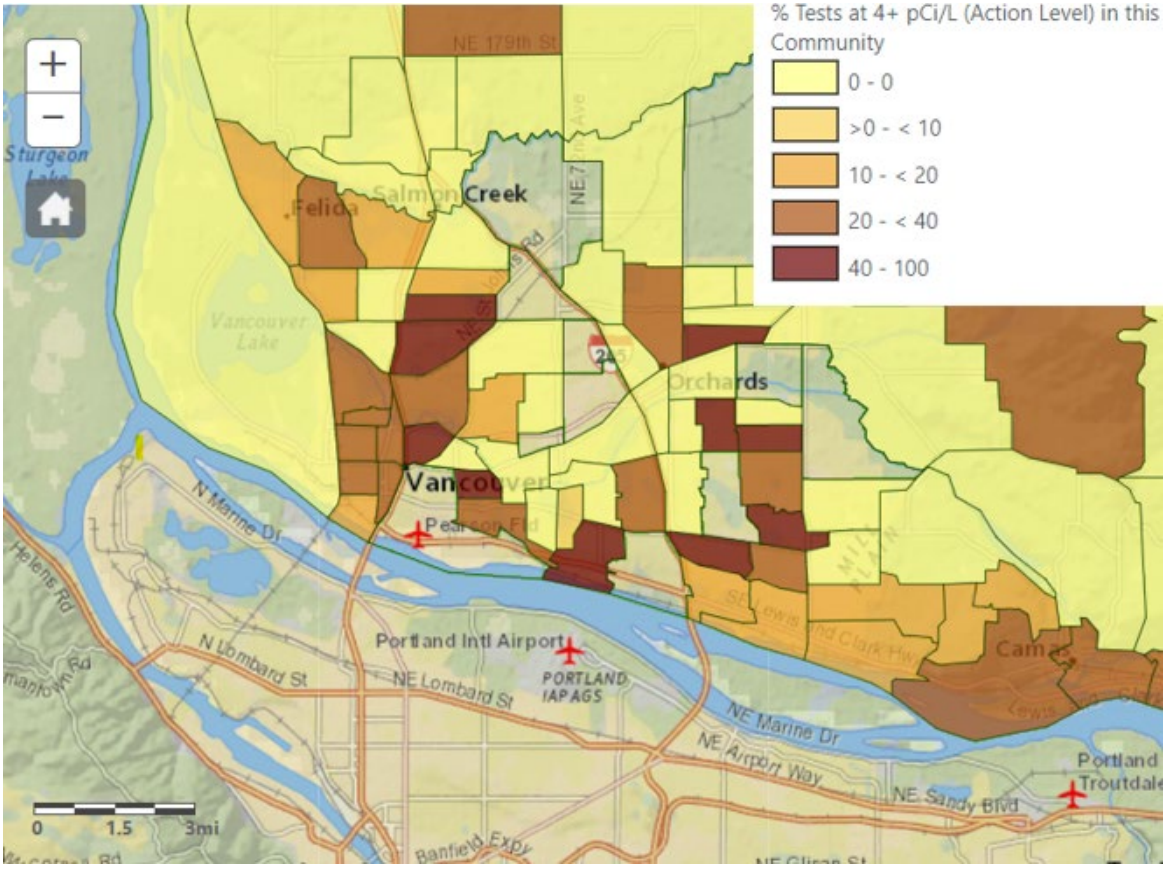
Source: Clark County n.d.

Clark County is classified by the U.S. Environmental Protection Agency (EPA) as a Zone 1 area, which has the highest potential risk for radon exposure (Clark County Public Health n.d.). Radon is a colorless, tasteless, and odorless radioactive gas that is released naturally from soil containing granite rock. Clark County and Vancouver have higher levels than some other parts of the state because of granite rock deposited naturally in this region 18,000

years ago. Radon testing in Vancouver has reported varying results in different parts of the city, with clusters of higher risk areas (defined as levels greater than 4 picocuries per liter of air) bordering the Columbia River and near the west, south, and east edges of the city, as shown in ~~Figure 33 Figure 33~~ Figure 35.

Radon is the leading cause of lung cancer among nonsmokers and contributes to higher rates of lung cancer for smokers (DOH n.d.). Radon can seep into homes from the ground through cracks in floors or walls, construction joints, gaps around pipes, and other means, and become trapped and concentrated. All types of homes can be affected, regardless of age or whether they contain a basement, and every home should be tested. However, there is a lower risk in homes above the third floor, and therefore the EPA recommends testing all residences below the third floor (National Center for Healthy Housing 2025).

~~Figure 33~~ Figure 35. Radon Exposure Test Levels in Vancouver Area Census Tracts



Source: Washington Tracking Network 2020

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following earth-related metrics:

- Consistency with City regulations for geologic hazard areas (VMC 20.740.130)
- Potential for increased exposure to geologic hazard risks at existing and future development sites
- Potential for increased risk of erosion at future development sites

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Consistency with City Regulations for Geologic Hazard Areas

None of the alternatives would conflict with City regulations for geologic hazard areas, as all of the alternatives would remain subject to the City's Critical Areas Ordinance (CAO), which regulates geologically hazardous areas under VMC 20.740.130. Please see the Avoidance, Minimization, and Mitigation Measures section for more information about the CAO requirements.

Potential for Increased Exposure to Geologic Hazard Risks at Existing and Future Development Sites

Existing and future development sites would experience some degree of risk for long-term geologic hazards under all alternatives. Some risks, such as landslide and erosion hazards, would be localized to sites in certain areas of the city, as described in the Affected Environment section and shown in ~~Figure 30 Figure 30~~ Figure 32 and ~~Figure 31 Figure 31~~ Figure 33. However, with the updated CAO, more areas of the ~~c~~City would likely be considered to be geologic hazard areas, which would potentially lead to limitations on development in these areas under all alternatives and thus reduce exposure to geologic hazard risks. Most of the ~~c~~City would be at low to moderate risk for ground shaking amplification hazards, as shown in ~~Figure 32 Figure 32~~ Figure 34. All citywide development would be at risk of volcanic hazards.

When modeling the potential future capacity for new housing units and jobs under all alternatives, analysts assumed that development would be constrained on parcels of land designated as critical areas, which include geologic hazard areas. These constraints could potentially limit exposure to geologic hazard risks. However, because all alternatives would have capacity for some level of housing and job growth, more people would potentially be exposed to these risks regardless of the alternative.

Under all alternatives, with the adoption of the updated CAO, there are additional requirements for development in geologic hazard areas, which would benefit health and safety, as discussed in the Avoidance, Minimization, and Mitigation Measures section. In addition, all alternatives would result in development of new buildings of three or more

stories. Units at or above the third story may better protect from radon exposure (BERK 2025).

Potential for Increased Risk of Erosion at Future Development Sites

All alternatives would lead to new construction or redevelopment, which could create increased risks of erosion at specific sites because of removal of vegetation on a temporary or permanent basis. The amount of new impervious surfaces, which include rooftops, driveways, sidewalks, parking lots, and compacted soils, would increase under all alternatives to some extent because of this new growth and development. Impervious surfaces in urban areas reduce infiltration of water into soils and increase surface water runoff, which can change the way that water and pollutants travel to urban streams and lead to increased erosion (EPA 2024a).

All alternatives would maintain the same amount of existing land designated as Parks/Open Space. Retaining these vegetated Parks/Open Space areas would help limit erosion risk at those sites. Under all alternatives, the land use designations would remain the same in areas with the greatest erosion hazards, which include the north bank of Lake River leading into Vancouver Lake, the northeast shore of Vancouver Lake, and along both sides of Burnt Bridge Creek Park.

Under all alternatives, with the adoption of the updated CAO, there would be additional planting requirements in geologic hazard areas to help support the stability and natural resilience of these areas.

No Action Alternative

In general, there would be minimal additional impacts under the No Action Alternative aside from those described in the Impacts Common to All Alternatives section. The No Action Alternative would be consistent with City regulations and would apply the updated CAO provisions for geologic hazard areas.

There would potentially be fewer construction impacts to earth resources under the No Action Alternative than Alternative 1, ~~and~~ Alternative 2 and the Preferred Alternative because the No Action Alternative would retain the existing land use and zoning designations, which generally allow for less density citywide. Because the No Action Alternative would have less capacity for new housing and jobs, it may result in lower levels of new construction and/or redevelopment and the associated ground disturbances, potential erosion, and increases in impervious surfaces, compared to Alternatives 1 and 2 and the Preferred Alternative. The differences in impacts between the No Action Alternative, ~~and~~ Alternatives 1 and 2, and the Preferred Alternative would generally be greatest outside of single-family neighborhoods. Within single-family neighborhoods, new GMA requirements to allow middle housing will be

imposed by the state if local jurisdictions do not take action to change their regulations to allow them.

Alternative 1

In general, there would be minimal additional impacts under Alternative 1 aside from those described in the Impacts Common to All Alternatives section. Alternative 1 would be consistent with City regulations and would apply the updated CAO provisions for geologic hazard areas. Compared to the No Action Alternative, Alternative 1 would have a substantially greater capacity for new buildings in zoning districts that allow three or more stories, which may better protect from radon exposure (BERK 2025).

Alternative 1 would allow for more dense development and would have greater capacity for new housing units and jobs, which would likely result in higher levels of new construction and/or redevelopment and the associated ground disturbances, potential erosion, and increases in impervious surfaces, compared to the No Action Alternative, particularly outside of single-family zones. However, Alternative 1 would have modestly fewer earth-related impacts than Alternative 2, which has the highest capacity for new housing units and jobs.

Alternative 2

In general, there would be minimal additional impacts under Alternative 2 aside from those described in the Impacts Common to All Alternatives section. Alternative 2 would be consistent with City regulations and would apply the updated CAO provisions for geologic hazard areas. Alternative 2 would have the highest capacity for new buildings in zoning districts that allow three or more stories, which may better protect from radon exposure (BERK 2025).

Alternative 2 would have similar impacts to Alternative 1 and the Preferred Alternative related to geologic hazard and erosion risks. However, because Alternative 2 would have options for more density and larger-scale buildings in more areas of the city, it would have greater potential than Alternative 1, the Preferred Alternative and the No Action Alternative to increase impervious surface areas and decrease vegetation, which could increase the potential for erosion. However, because Alternative 2 would allow for the densest development patterns, it would potentially result in less pressure to develop existing undeveloped sites, including those in or near erosion or landslide hazard areas than the No Action Alternative, ~~and~~ Alternative 1 and Preferred Alternative, which would lead to reduced risk exposure for people and property.

Preferred Alternative

In general, there would be minimal additional impacts under the Preferred Alternative aside from those described in the Impacts Common to All Alternatives section. The Preferred Alternative would be consistent with City regulations and would apply the updated Critical Areas Ordinance (CAO) provisions for geologic hazard areas. Compared to Alternative 1 and the No Action Alternative, the Preferred Alternative would have a greater capacity for new buildings in zoning districts that allow three or more stories, which may better protect from radon exposure (BERK 2025). However, this capacity for buildings with three or more stories would be lower than under Alternative 2.

Similar to Alternatives 1 and 2, the Preferred Alternative would allow for more dense development and would have greater capacity for new housing units and jobs, which would likely result in higher levels of new construction and/or redevelopment and the associated ground disturbances, potential erosion, and increases in impervious surfaces, compared to the No Action Alternative, particularly outside of single-family zones. The Preferred Alternative would have modestly fewer earth-related impacts than Alternative 2, which has the highest capacity for new housing units and jobs.

Avoidance, Minimization, and Mitigation Measures

Regardless of alternative, all future development projects will be required to comply with ~~e~~City and state requirements for geologically hazardous areas. The City's development review process will ensure compliance with the geologically hazardous areas requirements under VMC 20.740.130.

The City updated the CAO in December 2024 with the objective to better protect natural areas and, in the case of geologic hazard areas, reduce risks to public health and safety, while providing clearer and more flexible guidelines for property owners and developers (City of Vancouver 2024e).

All alternatives would be required to comply with these CAO changes, which include:

- Designation of Hazard Areas: Uses updated data sources for identifying liquefaction, ground shaking amplification, and fault rupture hazard areas to ensure designated areas are based on the most current and reliable geological information.
- Detailed Requirements for Critical Areas Reports: Specifies additional requirements for Critical Areas Reports for development proposals in potential geologic hazard areas to help ensure a comprehensive assessment of the site's geologic risks.

- Performance Standards and Buffers: Defines specific performance standards for development in geologic hazard areas, including buffer widths from hazard areas, to mitigate risks and ensure safety.
- Prohibition of Critical Facilities: Allows critical facilities in landslide, bank erosion, and fault rupture hazard areas only there is no other feasible location, a mitigation proposal must be included, and a Critical Areas Report demonstrates that the area is safe for the type of facility proposed.
- Prohibitions and Conditions During Wet Season: Adds stricter prohibitions on clearing, grading, and other activities that could destabilize soil during the wet season (November 1 to May 1), except under certain permits.
- New Planting Requirements: Requires new plantings in geologic hazard areas to consist of native vegetation and prohibits alterations to buffers that involve clearing vegetation without an approved erosion control plan.

During construction of future development projects under all alternatives, adherence to best management practices approved by Ecology and the appropriate provisions of the VMC would minimize erosion risks. Site-specific projects under all of the alternatives would be required to comply with applicable temporary erosion and sedimentation control measures as required by the City and the National Pollutant Discharge Elimination System Construction Stormwater General Permit's Storm Water Pollution Prevention Plan.

Significant Unavoidable Adverse Impacts

All of the alternatives have the potential to create impacts to earth resources as a result of expected population growth and development. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to earth resources are anticipated for any of the alternatives.

Air Quality, Greenhouse Gases and Climate

Methodology

Analysts reviewed relevant information sources and policies to describe existing conditions related to emissions of criteria air pollutants, mobile source air toxics, and greenhouse gases (GHG) including the following sources:

- EPA's AirData outdoor monitor values reports (EPA 2024b)
- Washington State Greenhouse Gas Emissions Inventory: 1990-2019 (Ecology 2022)
- City of Vancouver Climate Action Framework (City of Vancouver 2022b)

- City of Vancouver 2023 Inventory of Community and Government Operations Greenhouse Gas Emissions (City of Vancouver 2024d)
- Our Vancouver Health Impact Assessment (BERK 2025)

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Long-term air pollutant and GHG emissions
- Capacity for new housing in areas with air pollutant exposure risks
- Capacity for new housing and jobs in areas with high temperatures
- Air quality and GHG considerations during construction

For the air pollutant and GHG emissions analysis, estimated daily VMT from the regional transportation model, as discussed in the Transportation section, were multiplied by pollutant emission factors developed with EPA's Motor Vehicle Simulator (MOVES5) that represent an average vehicle within Clark County in 2045. The MOVES5 tool models emissions for carbon monoxide (CO), oxides of nitrogen (NO_x), particulate matter 10 microns or less in diameter (PM_{10}), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and GHG carbon dioxide equivalent (CO_{2e}).

Affected Environment

Air Quality

Vancouver is located in a regional airshed bounded on the south by Eugene, Oregon, on the north by Chehalis, Washington, on the west by the Coast Range, and on the east by the Cascade Mountains (City of Vancouver 2021a).

Air quality is monitored in Clark County by the Southwest Clean Air Agency, which was created in response to the Washington Clean Air Act of 1967. Clark County is currently classified by EPA as in attainment for all pollutants and averaging periods, based on its history of monitored concentrations in the region (EPA 2024b). Despite the area's EPA designation, air quality is an ongoing challenge for Vancouver and Clark County. Primary sources of air pollution in Vancouver include wildfire smoke, wood burning, cars, trucks, trains, and port activity.

Multiple governmental agencies operate air quality monitors throughout the states of Washington and Oregon that monitor concentrations of air pollutants according to EPA protocols. Within Vancouver, Washington, Ecology operates monitors for ozone and fine $PM_{2.5}$, a type of air pollution that consists of very small particles that are 2.5 micrometers or less in diameter. Oregon Department of Environmental Quality (DEQ) monitors CO, PM_{10}, $PM_{2.5}$, and ozone concentrations in Portland, Oregon, about 9 miles south of Vancouver, and

there is an additional $PM_{2.5}$ monitor location in Portland, about 4 miles south of Vancouver. Concentrations measured by these DEQ monitors are reported to the EPA as part of the Portland-Vancouver-Hillsboro core-based statistical area.

Table 30, Table 31, Table 32, and Table 33 summarize the criteria pollutant monitor data for the three most recent years of validated measurements for CO, PM_{10}, $PM_{2.5}$, and ozone respectively. Concentrations of CO, PM_{10}, and $PM_{2.5}$ did not exceed the National Ambient Air Quality Standards (NAAQS) during the period of 2021 through 2023. Although there were individual days when monitored ozone concentrations exceeded the NAAQS daily threshold, these instances did not constitute a violation of the standard. Under the NAAQS, a violation occurs when the annual fourth-highest daily maximum 8-hour ozone concentration, averaged over three years, is greater than 0.070 parts per million.

Table 30. Carbon Monoxide Measured Concentrations in Parts per Billion

Monitor Location: CO	Value	2021	2022	2023
5824 SE Lafayette Street, Portland, OR	1-hour Maximum	2.6	2.1	4.1
5824 SE Lafayette Street, Portland, OR	1-hour 2nd Maximum	2.1	1.9	1.8
5824 SE Lafayette Street, Portland, OR	No. of 1-hour Exceedances	0	0	0
5824 SE Lafayette Street, Portland, OR	8-hour Maximum	1.7	1.7	1.2
5824 SE Lafayette Street, Portland, OR	8-hour 2nd Maximum	1.4	1.5	1.2
5824 SE Lafayette Street, Portland, OR	No. of 8-hour Exceedances	0	0	0

Source: EPA 2024b

Notes: One hour CO standard of 35 parts per million is not to be exceeded more than once per year. Eight-hour carbon monoxide standard of 9 parts per million is not to be exceeded more than once per year.
Oregon Department of Environmental Quality (DEQ) monitors CO, PM_{10}, $PM_{2.5}$, and ozone concentrations in Portland, Oregon, about 9 miles south of Vancouver, and there is an additional $PM_{2.5}$ monitor location in Portland, about 4 miles south of Vancouver. Concentrations measured by these DEQ monitors are reported to the EPA as part of the Portland-Vancouver-Hillsboro core-based statistical area.
Key: CO = carbon monoxide.

Table 31. PM_{10} Measured Concentrations in Micrograms per Cubic Meter

Monitor Location: PM_{10}	Value	2021	2022	2023
5824 SE Lafayette Street, Portland, OR	24-hour Maximum	31	83	32
5824 SE Lafayette Street, Portland, OR	24-hour 2nd Maximum	29	39	27
5824 SE Lafayette Street, Portland, OR	No. of Exceedances	0	0	0
4915 N Gantenbein Avenue, Portland, OR	24-hour Maximum	27	89	21
4915 N Gantenbein Avenue, Portland, OR	24-hour 2nd Maximum	24	39	19
4915 N Gantenbein Avenue, Portland, OR	No. of Exceedances	0	0	0

Source: EPA 2024b

Note: 24-hour PM_{10} standard of 150 micrograms per cubic meter is not to be exceeded more than once per year on average over three years.
Key: PM_{10} = particulate matter less than or equal to 10 microns in diameter.

Table 32. $PM_{2.5}$ Measured Concentrations in Micrograms per Cubic Meter

Monitor Location: $PM_{2.5}$	Value	2021	2022	2023
5824 SE Lafayette Street, Portland, OR	24-Hour 98th percentile	16	27	17
5824 SE Lafayette Street, Portland, OR	Mean Annual	6.4	8	6.5
2722 NE 84th Avenue, Vancouver, WA	24-Hour 98th percentile	16	29	25
2722 NE 84th Avenue, Vancouver, WA	Mean Annual	5.7	7.7	6.4

Source: EPA 2024b

Note: 24-hour $PM_{2.5}$ standard is exceeded when the 98th percentile, averaged over three years, is greater than 35 µg/m^3. Annual $PM_{2.5}$ standard is exceeded when the annual mean, averaged over three years, is greater than 9 µg/m^3.
Key: µg/m^3 = micrograms per cubic meter; $PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter

Table 33. Ozone Measured Concentrations in Parts per Million

Monitor Location: Ozone	Value	2021	2022	2023
5824 SE Lafayette Street, Portland, OR	1st Highest	**.072**[a]	**.08**[a]	.067
5824 SE Lafayette Street, Portland, OR	2nd Highest	.066	.07	.064
5824 SE Lafayette Street, Portland, OR	3rd Highest	.066	.057	.062
5824 SE Lafayette Street, Portland, OR	4th Highest	.06	.056	.056
5824 SE Lafayette Street, Portland, OR	No. of days above standard	1	1	0
1500 SE Blairmont Drive (Mountain View High School), Vancouver, WA	1st Highest	.068	.062	**.086**[a]
1500 SE Blairmont Drive (Mountain View High School), Vancouver, WA	2nd Highest	.064	.06	.067
1500 SE Blairmont Drive (Mountain View High School), Vancouver, WA	3rd Highest	.057	.057	.065
1500 SE Blairmont Drive (Mountain View High School), Vancouver, WA	4th Highest	.057	.056	.062
1500 SE Blairmont Drive (Mountain View High School), Vancouver, WA	No. of days above standard	0	0	1

Source: EPA 2024b

Notes:

a **Bold numbers** in the table indicate daily concentration above the ozone standard. Note that a daily concentration above the ozone standard does not necessarily indicate an exceedance of the NAAQS.
Ozone standard is exceeded when the annual fourth-highest daily maximum 8-hour concentration, averaged over three years, is greater than 0.070 parts per million.

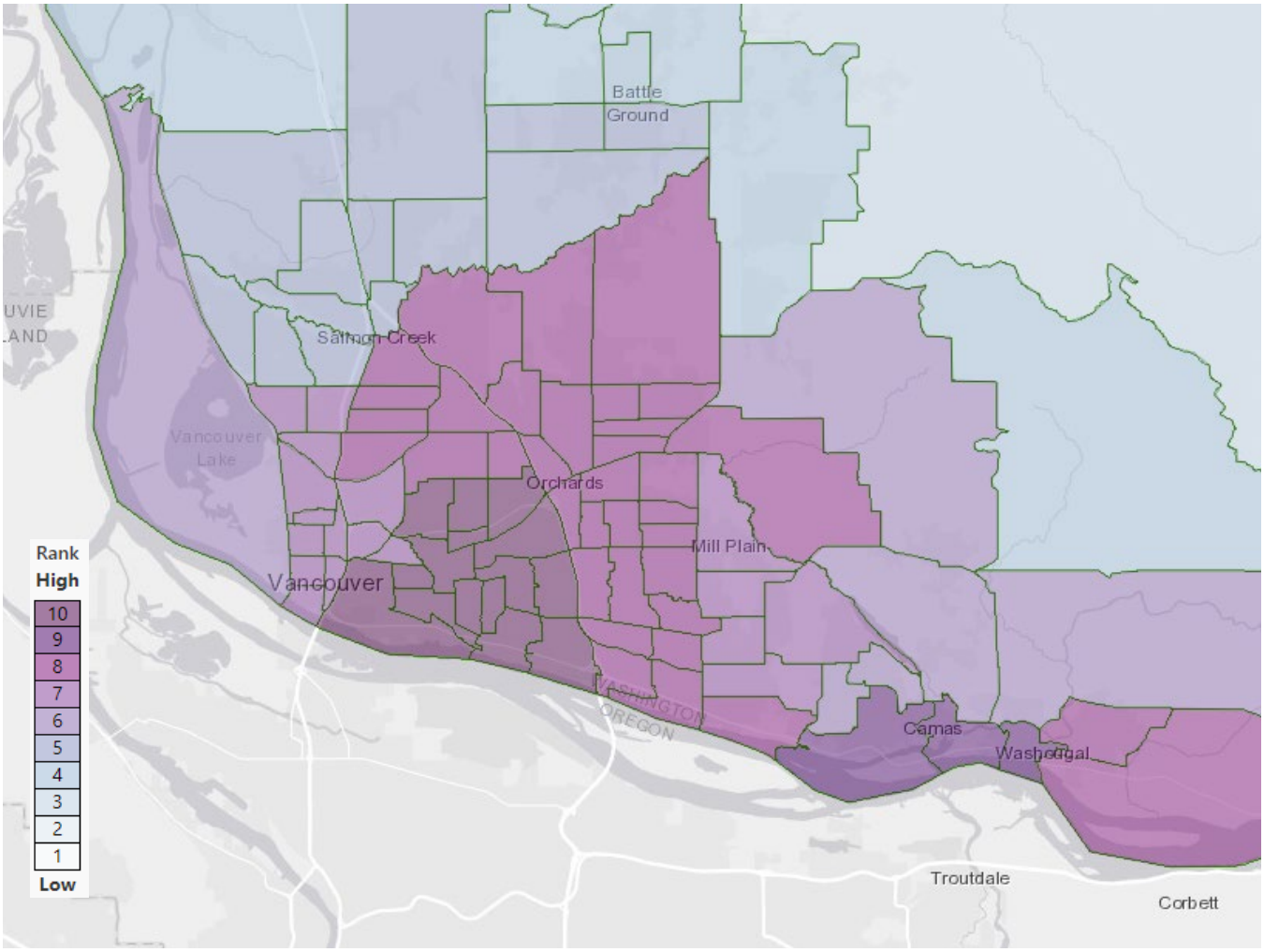
Section 107 of the 1977 Clean Air Act Amendments requires that the EPA publish a list of all geographic areas in compliance with the NAAQS, plus those not attaining the NAAQS. Areas not in NAAQS compliance are deemed nonattainment areas. Maintenance areas are areas that were previously designated as nonattainment for a particular pollutant but have since demonstrated compliance with the NAAQS for that pollutant. An area's designation is based on the data collected by the state monitoring network on a pollutant-by-pollutant basis.

As summarized in Table 32 and Table 33, concentrations of $PM_{2.5}$ and ozone are approaching the NAAQs. In 2024, Clark County received an "F" grade from the American Lung Association's State of the Air Report, based on elevated $PM_{2.5}$ concentrations from the period 2020-2022 (Design Workshop 2024). However, Clark County received a "C" grade in 2025, based on improved $PM_{2.5}$ concentrations in the period 2021-2024 (American Lung Association 2025).

Vancouver was identified as a community that is overburdened and highly impacted by air pollution by Ecology because of the elevated levels of $PM_{2.5}$ compared to the rest of the state, and the vulnerability of the community to air pollution impacts due to poverty, linguistic isolation, and unaffordable housing (Ecology 2025). This designation was determined based on monitored concentrations of air pollutants, results of state mapping tools that compare communities across the state for environmental health disparities, and federal mapping tools that evaluates the combination of environmental health risks and demographic data.

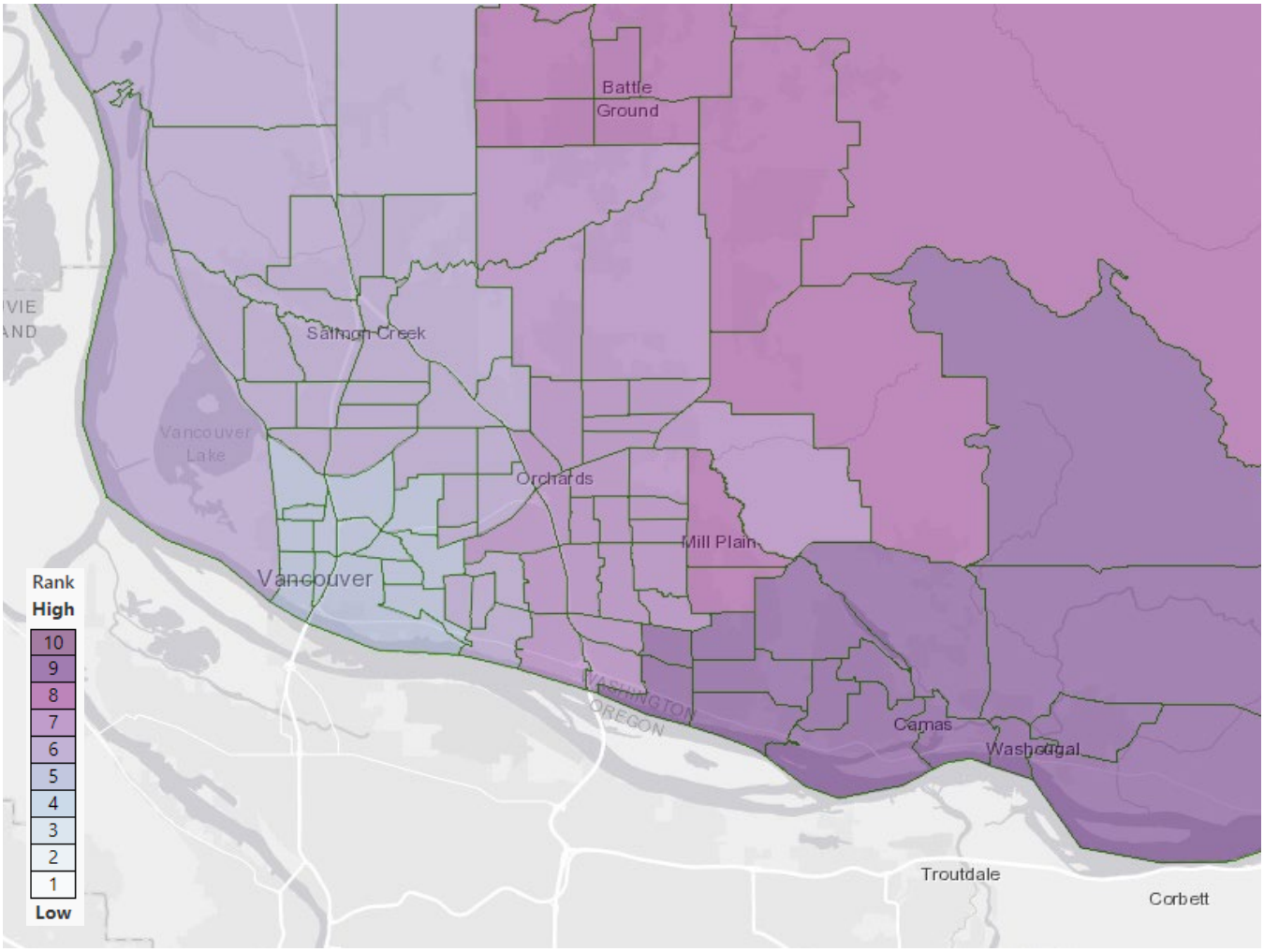
The Washington Department of Health (DOH) assigns rankings from 1 to 10, where 10 is the highest risk, for various categories of potential health risk, including exposure to $PM_{2.5}$ and ozone. The risk rankings for $PM_{2.5}$ exposure range from 7 to 10 throughout the ~~e~~City and are highest in Central and East Vancouver. The risk rankings for ozone are generally lower citywide, with higher risk levels in East Vancouver. The results of the DOH mapping tool for Vancouver and the surrounding area are shown in ~~Figure 34~~ ~~Figure 34~~ Figure 36 and ~~Figure 35~~ ~~Figure 35~~ Figure 37 (DOH 2022).

~~Figure 34~~ Figure 36. $PM_{2.5}$ Exposure Ranking Compared to Other Census Tracts in Washington



Source: DOH 2022

~~Figure 35~~ Figure 37. Ozone Exposure Ranking Compared to Other Census Tracts in Washington

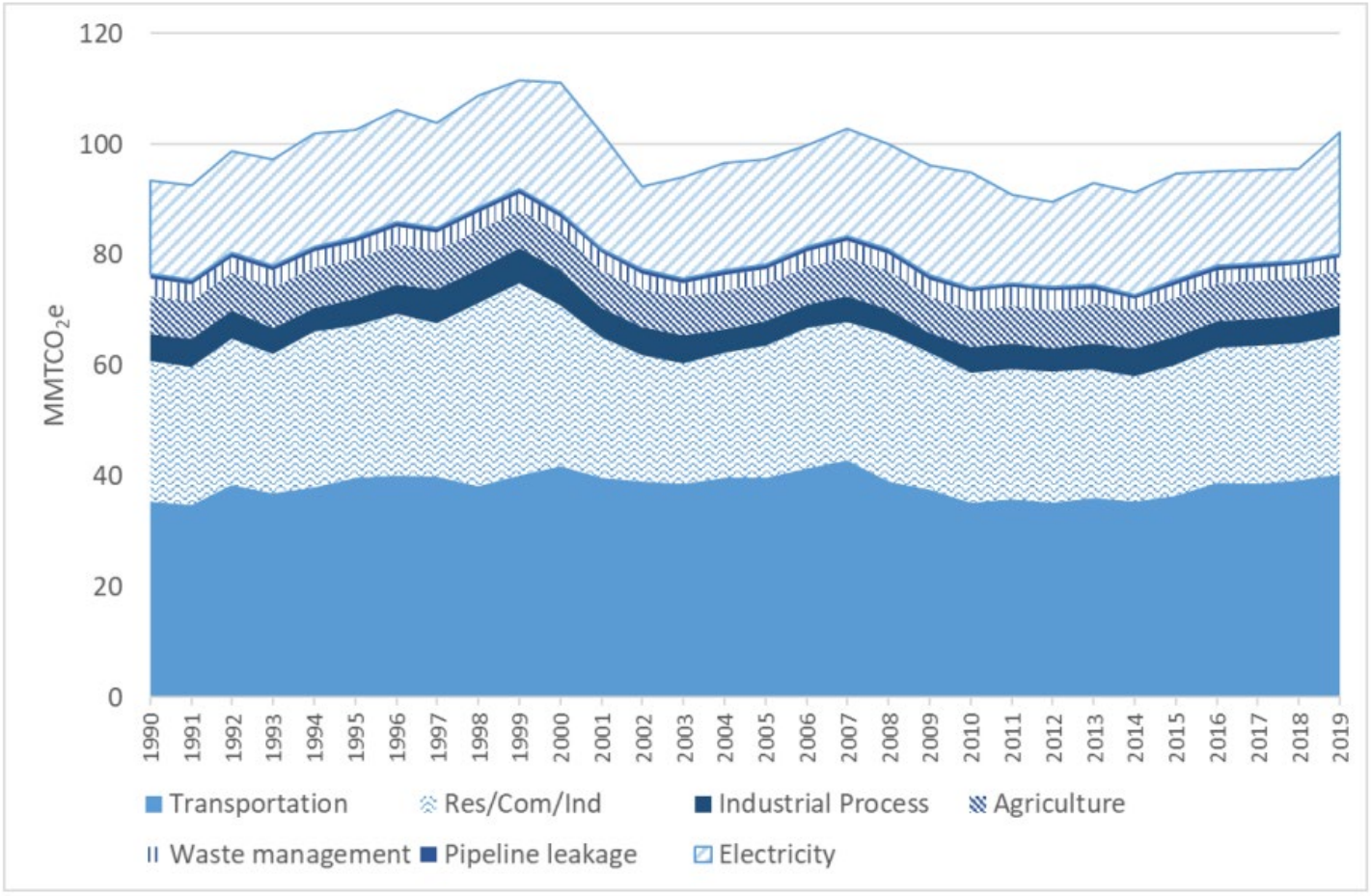


Source: DOH 2022

Greenhouse Gas Emissions

Greenhouse gases are evaluated by estimating the emissions from multiple sectors in units of CO_2e. The most recent Washington State Greenhouse Gas Emissions Inventory evaluates the trends in GHG emissions by sector from 1990 to 2019 (Ecology 2022). As shown in ~~Figure 36~~ ~~Figure 36~~ Figure 38, the state has seen a rise in total GHG emissions since 2016, with a majority of the emissions from the transportation and energy sectors.

~~Figure 36~~ Figure 38. Washington's Total Greenhouse Gas Emissions 1990-2019

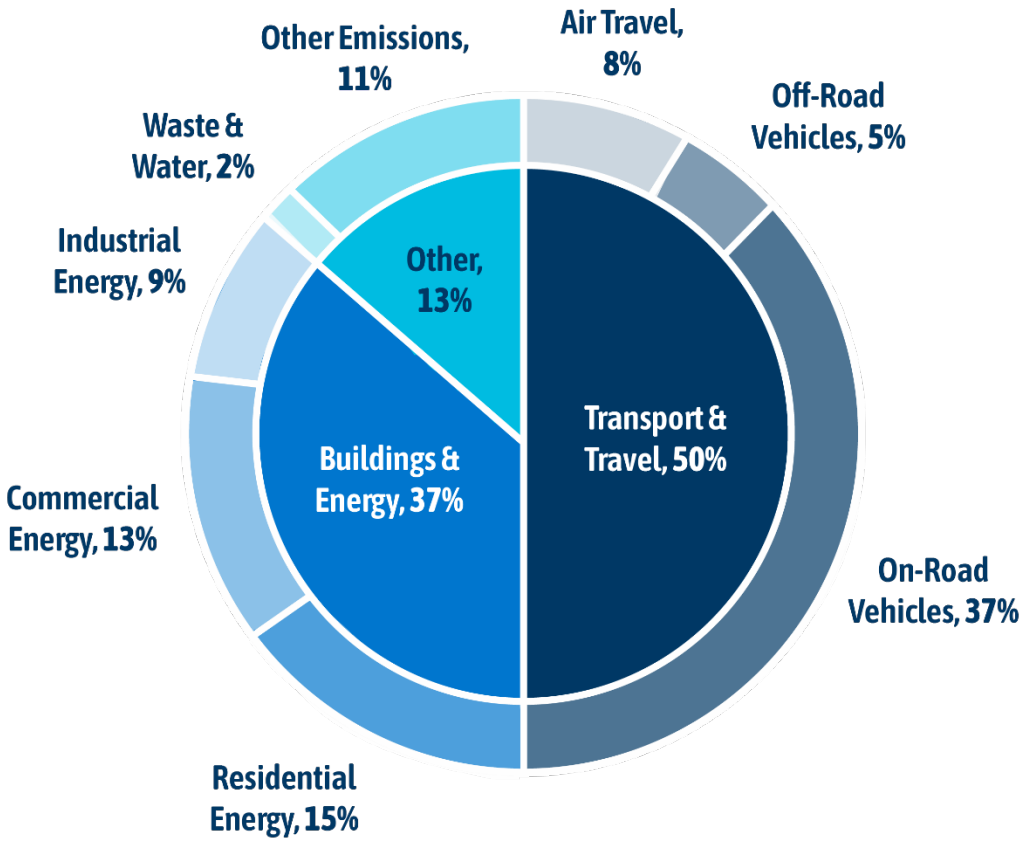


Source: Ecology 2022

Note: In the chart above, Electricity refers to all electricity consumption, and Res/Com/Ind refers to energy consumption other than electricity by residential, commercial, and industrial sources. $MMTCO_2e$ is million metric tons of carbon dioxide equivalent.

In 2023, about 87% of Vancouver's emissions came from transport and travel and building energy (City of Vancouver 2024d). 2023 is the baseline year of analysis for the Comprehensive Plan Update. As summarized in ~~Figure 37~~ ~~Figure 37~~ Figure 39, major emissions sources included on-road vehicles (37%), followed by residential (15%) and commercial (13%) buildings, with other emissions sources ranging from 2% to 11% of the total.

~~Figure 37~~ Figure 39. City of Vancouver 2023 Greenhouse Gas Inventory by Sector



Source: City of Vancouver 2024d

Vancouver's Climate Action Framework sets a goal of achieving carbon neutrality by 2040 by reducing and nearly eliminating carbon pollution from homes, business, vehicles, and City services while enriching parks, green spaces, and other natural systems (City of Vancouver 2022b). Vancouver's GHG emissions declined 27% between 2007 and 2023, despite a growing population and economy (City of Vancouver 2024d). The decreased emissions were a result of the decarbonization of the local electrical grid as well as strengthened fuel efficiency standards for vehicles and increased energy efficiency of buildings and appliances.

Looking toward the future, the Climate Action Framework identifies key focus areas and associated visions, as well as strategies and actions:

- Equity and Green Economy: Vancouver will be a city that embeds equity in climate action, with regular assessments of community vulnerability, a comprehensive anti-displacement policy, and climate strategies and actions that prioritize an equitable distribution of costs

and benefits. Through a just transition, Vancouver will be a city that educates and trains its workers for careers in clean technology, renewable energy, and zero-emission vehicles.

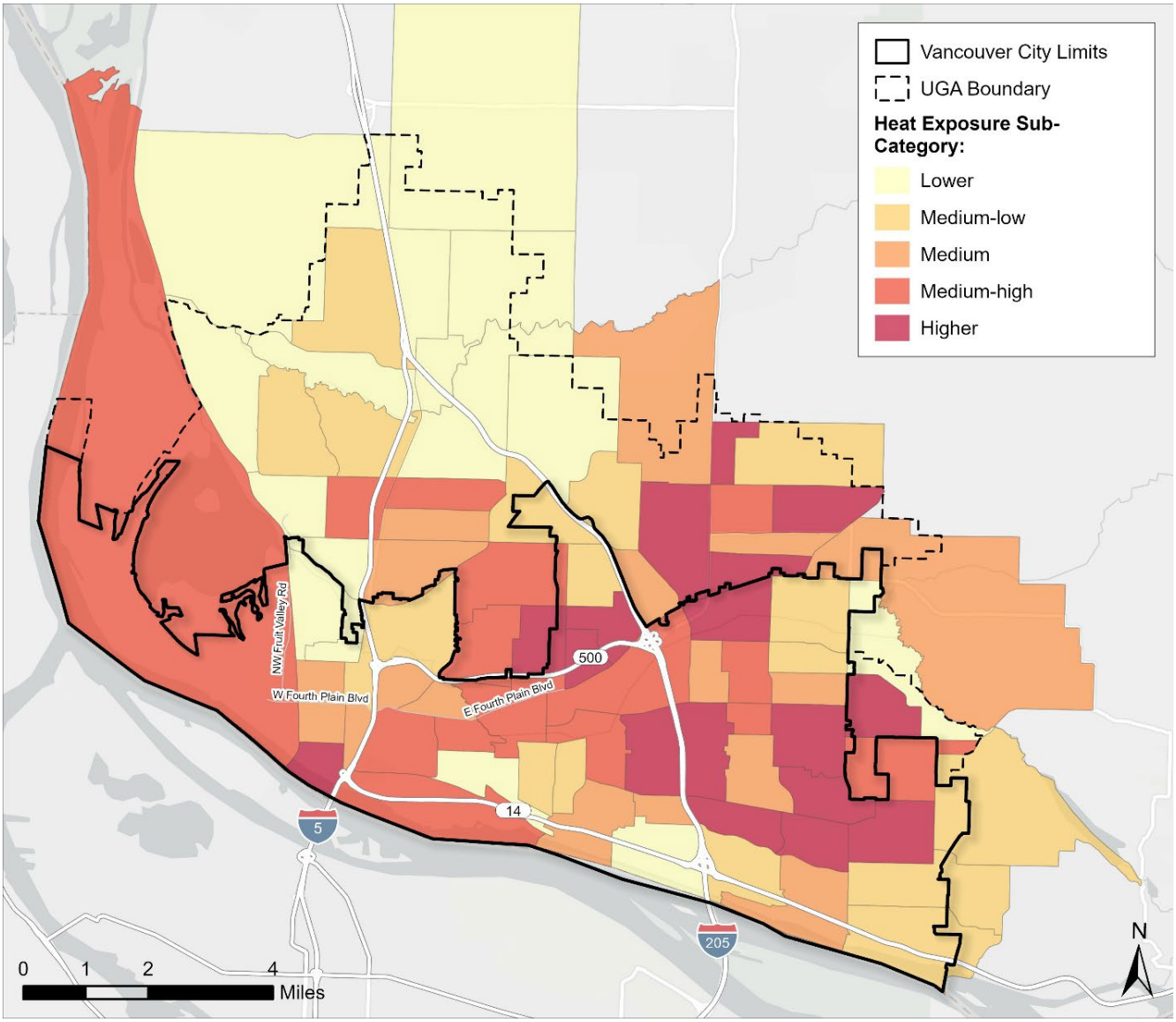
- Buildings and Energy: Vancouver will transition to 100% clean energy and significantly reduce per capita energy use.
- Transportation and Land Use: Vancouver's residents will be able to reach their destinations safely, reliably, and efficiently, however they choose to travel. Zero-emission vehicles will be affordable, common, and easy to charge or fuel. Our neighborhoods will be walkable, mixed-use, and higher-density, with secure affordable housing for current residents.
- Natural Systems and Water Resources: Vancouver's parks, trails, and green spaces will store carbon, connect our neighborhoods, and preserve sensitive land and wildlife. The community will manage water consumption wisely.
- Solid Waste and Wastewater: We will reduce per capita waste by diverting food to those who need it, and by reusing, repairing, recycling, and composting more. We will reduce per capita water usage and operate our wastewater treatment more efficiently.
- City Governance: Vancouver will be a city that embeds climate change in everything we do. We will ensure that staff are knowledgeable and empowered to make sustainable decisions and there is adequate permanent funding to make our low-emissions, resilient vision a reality.

Climate

Vancouver has wet, mild winters and warm, dry summers. Government researchers project that Washington temperatures could increase an average of 4.7 to 10 degrees Fahrenheit by the 2080s due to global climate change, along with a 10% increase in winter precipitation levels, increased frequency and intensity of extreme precipitation events, and more frequent unusually hot summer days (City of Vancouver 2021a; U.S. Global Change Research Program 2023).

As part of climate change resilience work in 2024, a heat exposure index was created to understand summer heat differences across Vancouver and presented in ~~Figure 38~~ Figure 38 Figure 40 (BERK 2025). Block groups with greater heat exposure occur across the city, generally in areas with more impervious (paved) surfaces, such as industrial parks, office parks, shopping centers, and hospitals. The Our Vancouver Health Impact Assessment provides additional information about potential climate risks to health throughout the ~~e~~City (BERK 2025).

~~Figure 38~~ Figure 40. Heat Exposure Index



Source: BERK 2025

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following air quality, greenhouse gases, and climate metrics:

- Air pollutant and GHG emissions
- Capacity for new housing in areas with air pollutant exposure risks
- Capacity for new housing and jobs in areas with high temperatures
- Air quality considerations during construction

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Long-term air pollutant and GHG Emissions

Existing sources of air pollutant and GHG emissions within Vancouver include on-road vehicle exhaust, non-road equipment exhaust (including construction equipment, marine vessels, and rail), residential wood burning, and industrial facilities. On-road vehicle and non-road equipment activity are the highest source of GHG and a major contributor to emissions of CO and NO_x. These emissions typically increase with population and commercial growth, which could occur under all alternatives. However, they are expected to be offset to a degree in the future as stricter vehicle and fuel economy standards are phased in, as well as through the continuing transition to electricity and alternative fuels.

Table 34 summarizes the results of modeled 2023 and 2045 daily air pollutant and GHG emissions. The regional transportation model outputs used for the air quality and GHG analysis consider assumptions about future population and employment growth, expected changes in land use, and reasonably foreseeable future transportation projects. Therefore, the air quality and GHG effects analysis accounts not only for potential long-term direct effects but also potential long-term indirect and cumulative effects resulting from the Comprehensive Plan Update.

Although VMT would be higher under all alternatives in 2045 than in 2023, air pollutant and GHG emissions for all alternatives would be substantially lower because of regulations for vehicles and engines that are expected to continue to phase in over time. Daily air pollutant and GHG emissions are expected to be ~~46~~71% lower under the No Action Alternative, ~~41~~68% lower under Alternative 1 and the Preferred Alternative, and ~~39~~67% lower under Alternative 2 compared to existing conditions.[2] VMT would be slightly higher under Alternative 1, ~~and~~ Alternative 2, and the Preferred Alternative than the No Action Alternative, resulting in 10.5% to ~~11.5~~12.7% higher emissions of air pollutants and GHG under the action alternatives compared to the No Action Alternative. Differences in GHG emissions could be offset by the

[2] Note: The percent differences between the alternatives and existing conditions, as well as between the No Action Alternative and Alternative 2, have been updated since the Draft EIS to correct mathematical errors.

climate benefits associated with higher-density development and other actions the City is taking under its Climate Action Framework.

The transportation modeling results, as discussed in the Transportation section of Chapter 3, indicated minimal differences in transportation mode choices between alternatives, with active transportation modes continuing to compose a small share (approximately 10%) of trips in the future. However, Alternatives 1 and 2 and the Preferred Alternative would encourage a walkable, compact, and mixed-use style of development in more areas of the ~~e~~City than the No Action Alternative. Therefore, over time, Alternatives 1 and 2 and the Preferred Alternative would be more likely to shift vehicle trips to zero-emission modes, facilitate shorter vehicle trips, and support further reductions of air pollutants and GHG emissions.

Table 34. Modeled 2045 Daily Air Pollutant and GHG Emissions from Vehicle Exhaust

Alternative/ Topic	VMT (miles/ day)[a]	CO Emissions (pounds/day)	NO_X Emissions (pounds/day)	PM_{10} Emissions (pounds/day)	$PM_{2.5}$ Emissions (pounds/day)	GHG Emissions (metric tons CO_{2e}/day)
Existing Conditions	4,315,718	16.86	3.34	0.23	0.11	2,467
No Action[b]	5,327,928	4.86	0.44	0.13	0.04	1,326
Alternative 1	5,885,872	5.37	0.49	0.14	0.04	1,465
Alternative 2	6,006,556	5.48	0.50	0.14	0.04	1,495
Preferred Alternative (2045)	5,905,133	5.39	0.49	0.14	0.04	1,470
Difference between Alternative 1 and No Action	10.5%	10.5%	10.5%	10.5%	10.5%	10.5%
Difference between Alternative 2 and No Action	12.7%	12.7%	12.7%	12.7%	12.7%	12.7%
Difference between Preferred Alternative and No Action	10.8%	10.8%	10.8%	10.8%	10.8%	10.8%

Notes: This table was reformatted to better fit the page and updated since the Draft EIS to include Preferred Alternative data and correct errors in percentage changes between Alternative 2 and the No Action Alternative. Refer to the strikeout table below for the previous version.

a VMT provided by RTC regional travel demand model outputs (RTC 2025, 2026)

b The No Action Alternative is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 and the Preferred Alternative include assumptions related to market feasibility and redevelopment.

Key: CO = carbon monoxide, CO_2e = carbon dioxide equivalent, GHG = greenhouse gases, NO_X = oxides of nitrogen, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter, PM_{10} = particulate matter 10 microns or less in diameter

Metric	Existing Conditions (2023)	No Action[b] (2045)	Alternative 1 (2045)	Alternative 2 (2045)	Difference between Alternative 1 and No Action	Difference between Alternative 2 and No Action
VMT (miles/day)[a]	4,315,718	5,327,928	5,885,872	6,006,556	10.5%	11.5%
CO Emissions (pounds/day)	16.86	4.86	5.37	5.48	10.5%	11.5%
NO_x Emissions (pounds/day)	3.34	0.44	0.49	0.50	10.5%	11.5%
PM_{10} Emissions (pounds/day)	0.23	0.13	0.14	0.14	10.5%	11.5%
$PM_{2.5}$ Emissions (pounds/day)	0.11	0.04	0.04	0.04	10.5%	11.5%
GHG Emissions (metric tons CO_2e/day)	2,467	1,326	1,465	1,495	10.5%	11.5%

Anticipated new growth and development would require increased energy use of natural gas and electricity under all alternatives. There are no direct emissions of GHG from electricity use; however, there are emissions associated with the generation of that electricity. Although overall electricity use is expected to increase with future growth, overall GHG emissions from electricity generation are expected to decline in the future as Washington transitions to a carbon-free electricity supply by 2045. Quantifying the potential increase in GHG emissions associated with new buildings would require specific details about proposed residency types and commercial square footage for each alternative, which are not available at the planning level of this analysis. Future analyses would be conducted as applicable through project-specific SEPA analysis.

Capacity for new housing in areas with air pollutant exposure risks

Based on the projected distribution of growth and development across the city, all alternatives would include capacity for new housing units in areas with a higher risk for

exposure to air pollutants, as shown in Table 35 and Table 36. However, as noted in the previous section, emissions of $PM_{2.5}$ for all alternatives would be substantially lower because of regulations for vehicles and engines that are expected to continue to phase in over time. Therefore, the future risk exposure may not be as high.

Table 35. Estimated Capacity for New Housing Units in Areas with High $PM_{2.5}$ Exposure Risk

Metric	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Projected Capacity for New Housing Units in Areas with High $PM_{2.5}$ exposure risk	10,100[a]	8,000	9,700	8,200
Percent of Total Projected Capacity for New Housing Units	34%[a]	18%	19%	17%

Source: BERK 2025

Note:
a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Table 36. Estimated Capacity for New Housing Units in Areas with Ozone Concentration Risk

Metric	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Projected Capacity for New Housing Units in Areas with Ozone Concentration Risk	4,800[a]	15,100	16,700	14,900
Percent of Total Projected Capacity for New Housing Units	16%[a]	33%	33%	31%

Source: BERK 2025

Note:
a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Capacity for new housing and jobs in areas with heat islands

All alternatives would also include capacity for new housing units and jobs in heat islands, defined as areas with Medium-High or Higher heat exposure scores in the City's Climate Index

(refer to ~~Figure 38~~ ~~Figure 38~~ Figure 40). Table 37 summarizes the capacity across alternatives (BERK 2025).

Table 37. Estimated Capacity for New Housing Units and Jobs in Heat Islands

Metric	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Projected Capacity for Housing Units in Heat Islands	14,400[a]	22,400	20,800	17,100
Percent of Total Projected Capacity for New Housing Units	49%[a]	50%	41%	35%
Projected Capacity for New Jobs in Heat Islands	11,500[a]	27,600	30,700	23,800
Percent of Total Projected Capacity for New Jobs	39%[a]	61%	61%	53%

Source: BERK 2025

Note:
a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Air quality and GHG considerations during construction

Under all alternatives, some construction work activities (particularly those involving paving operations using asphalt) could result in short-term odors, which could be detectable to some people near construction sites and would be diluted as distance from the site increases.

All alternatives would lead to new construction or redevelopment, which would result in short-term emissions of GHG and air pollutants from worker commutes and construction vehicle exhaust. Particulate matter could also be generated where soil would be disturbed by ground clearing and preparation, stockpiling of materials, and by construction vehicles tracking soil from sites onto area streets where other vehicles could stir up and release fugitive dust. Construction of any stationary sources of air emissions, including industrial facilities or services that require industrial-scale combustion equipment will be regulated by Southwest Clean Air Agency and complete their own SEPA process.

Construction activities are also likely to require temporary diesel-fired generators to provide power for electric equipment, which produce emissions of air pollutants and GHG. Southwest

Clean Air Agency should be consulted when construction projects that require the use of temporary generators to determine whether any air permits are required. Disruption of traffic during construction (such as a temporary reduction of roadway capacity and increased queue lengths) could result in short-term, elevated concentrations of pollutants from slowed or idling vehicles. Although emissions from construction projects would be temporary, it is anticipated that varying levels of construction would occur under all of the alternatives that could cumulatively contribute to construction-related air pollutant and GHG emissions citywide.

No Action Alternative

Long-term air pollutant and GHG Emissions

No additional effects were identified for the No Action Alternative beyond those discussed in the Impacts to All Alternatives section. The No Action Alternative is modeled to have slightly lower emissions than Alternative 1 and 2 and the Preferred Alternative because of lower projected VMT (associated with lower growth capacity) and about ~~46~~71% lower emissions than existing conditions. However, the No Action Alternative would retain lower-density zoning districts and a less compact, walkable urban form. Therefore, the No Action Alternative would be less likely than Alternatives 1 and 2 and the Preferred Alternative to shift trips to zero-emission modes over time and facilitate shorter vehicle trips, and would not help to support further reductions of air pollutant and GHG emissions.

Capacity for new housing in areas with air pollutant exposure risks

No additional effects were identified for the No Action Alternative beyond those discussed in the Impacts to All Alternatives section. There would be a slightly higher capacity for new housing units in areas with high $PM_{2.5}$ than ~~the action alternatives~~ under Alternatives 1 and 2 and the Preferred Alternative and a lower capacity for new housing units in areas with ozone exposure risk than under Alternatives 1 and 2 and the Preferred Alternative.

Capacity for new housing and jobs in areas with heat islands

No additional effects were identified for the No Action Alternative beyond those discussed in the Impacts to All Alternatives section. Consistent with the lower overall capacity for housing units and jobs under the No Action Alternative, there would be lower capacity for new housing units and jobs in areas with heat islands than under Alternatives 1 and 2 and the Preferred Alternative.

Air quality and GHG considerations during construction

No additional effects were identified for the No Action Alternative beyond those discussed in the Impacts to All Alternatives section. The No Action Alternative would have the lowest potential for construction-related air quality impacts of all the alternatives because it would have the lowest capacity for new housing units, jobs, and associated new development.

Alternative 1

Long-term air pollutant and GHG Emissions

No additional effects were identified for Alternative 1 beyond those discussed in the Impacts to All Alternatives section. Emissions for Alternative 1 are modeled to be slightly higher than the No Action Alternative and similar to Alternative 2 and the Preferred Alternative because of higher projected VMT but about ~~41~~71% lower than existing conditions. However, Alternative~~s~~ 1 would encourage a more walkable, compact style of development than the No Action Alternative but proposes fewer high-density areas than Alternative 2. Therefore, Alternative 1 would be more likely to shift vehicle trips to zero-emission modes, facilitate shorter vehicle trips, and support further reductions of air pollutant and GHG emissions over time than the No Action Alternative but less likely to do so than Alternative 2.

Capacity for new housing in areas with air pollutant exposure risks

No additional effects were identified for Alternative 1 beyond those discussed in the Impacts to All Alternatives section. There would be a similar capacity for new housing units in areas with high $PM_{2.5}$ across all alternatives. Alternative 1 would have a higher capacity for new housing units in areas with high ozone exposure risk than the No Action Alternative, ~~and~~ a lower capacity than Alternative 2, and similar capacity compared to the Preferred Alternative.

Capacity for new housing and jobs in areas with heat islands

No additional effects were identified for Alternative 1 beyond those discussed in the Impacts to All Alternatives section. Alternative 1 would have a higher capacity for new housing units in urban heat islands than the No Action Alternative, ~~and~~ Alternative 2 and the Preferred Alternative, ~~but~~ and a lower capacity for new jobs in these areas than Alternative 2.

Air quality and GHG considerations during construction

No additional effects were identified for Alternative 1 beyond those discussed in the Impacts to All Alternatives section. Alternative 1 would have a higher potential for construction-related air quality and GHG emissions impacts than the No Action Alternative because it would have a higher capacity for new housing units, jobs, and associated new development. These impacts would be similar to Alternative 2 and the Preferred Alternative.

Alternative 2

Long-term air pollutant and GHG Emissions

No additional effects were identified for Alternative 2 beyond those discussed in the Impacts to All Alternatives section. Emissions for Alternative 2 are modeled to be ~~11.5~~12.7% higher than the No Action Alternative and similar to Alternative 1 and the Preferred Alternative because of higher projected VMT. However, Alternative 2 would encourage a walkable, compact, and

mixed-use style of development in the most parts of the ~~c~~City compared to the No Action Alternative and Alternative 1. Therefore, Alternative 2 would be the most likely to shift vehicle trips to zero-emission modes, facilitate shorter vehicle trips, and support further reductions of air pollutant and GHG emissions.

Capacity for new housing in areas with air pollutant exposure risks

No additional effects were identified for Alternative 2 beyond those discussed in the Impacts to All Alternatives section. There would be a similar capacity for new housing units in areas with high $PM_{2.5}$ across all alternatives. Alternative 2 would have the highest capacity for new housing units in areas with high ozone exposure risk.

Capacity for new housing and jobs in areas with heat islands

No additional effects were identified for Alternative 1 beyond those discussed in the Impacts to All Alternatives section. Alternative 2 would have a lower capacity for new housing units in urban heat islands than ~~the No Action Alternative and~~ Alternative ~~2~~1, but ~~a~~the highest~~r~~ capacity for new jobs in these areas.

Air quality and GHG considerations during construction

No additional effects were identified for Alternative 2 beyond those discussed in the Impacts to All Alternatives section. Alternative 2 would have the highest potential for construction-related air quality and GHG emissions impacts because it would have the highest capacity for new housing units, jobs, and associated new development. However, these impacts are likely to be similar to Alternative 1.

Preferred Alternative

Long-term air pollutant and GHG Emissions

No additional effects were identified for the Preferred Alternative beyond those discussed in the Impacts to All Alternatives section. Emissions for the Preferred Alternative are modeled to be slightly higher than the No Action Alternative and similar to Alternatives 1 and 2 because of higher projected VMT but about 68% lower than existing conditions. The Preferred Alternative would encourage a more walkable, compact style of development than the No Action Alternative but would propose modestly fewer high-density areas than Alternative 2. Therefore, the Preferred Alternative would be more likely to shift vehicle trips to zero-emission modes, facilitate shorter vehicle trips, and support further reductions of air pollutant and GHG emissions over time than the No Action Alternative but would be modestly less likely to do so than Alternative 2.

Capacity for new housing in areas with air pollutant exposure risks

No additional effects were identified for the Preferred Alternative beyond those discussed in the Impacts to All Alternatives section. There would be a similar capacity for new housing

units in areas with high $PM_{2.5}$ across all alternatives. The Preferred Alternative would have a higher capacity for new housing units in areas with high ozone exposure risk than the No Action Alternative and a lower capacity than Alternatives 1 and 2.

Capacity for new housing and jobs in areas with heat islands

No additional effects were identified for the Preferred Alternative beyond those discussed in the Impacts to All Alternatives section. The Preferred Alternative would have a higher capacity for new housing units and jobs in urban heat islands than the No Action Alternative. However, the Preferred Alternative would have a lower capacity for new housing units and jobs in urban heat islands than Alternatives 1 and 2.

Air quality and GHG considerations during construction

No additional effects were identified for the Preferred Alternative beyond those discussed in the Impacts to All Alternatives section. The Preferred Alternative would have a higher potential for construction-related air quality and GHG emissions impacts than the No Action Alternative because it would have a higher capacity for new housing units, jobs, and associated new development. These impacts would be similar to Alternatives 1 and 2.

Avoidance, Minimization, and Mitigation Measures

Future air pollutant emissions under all alternatives are expected to be lower than existing emissions due to improvements in vehicle technology and stricter fuel and engine regulations. Although Alternatives 1 and 2 and the Preferred Alternative would produce more air pollutant and GHG emissions than the No Action Alternative, the EPA has not established thresholds for determining significant air quality impacts in attainment areas. Therefore, no specific mitigation measures are required. Strategies to minimize vehicle emissions include actions that continue Vancouver's efforts to encourage mode shift away from driving alone (e.g., transit improvements, active transportation infrastructure, carpooling incentives) and actions that encourage the transition to alternative fuels (e.g., electric vehicle charging stations).

Similarly, future GHG emissions under all alternatives would be lower than existing conditions due to the ongoing decarbonization of the electricity supply. Although Alternatives 1 and 2 and the Preferred Alternative would result in slightly higher GHG emissions from energy use as compared to the No Action Alternative, there are no established thresholds to define a significant impact to GHG emissions. Therefore, no specific mitigation measures are required. Strategies to minimize energy-related emissions include actions that encourage energy efficiency and the transition away from natural gas.

Vancouver's Climate Action Plan outlines specific actions to minimize emissions from transportation sources, buildings and energy use, as described in the Affected Environment subsection.

In addition, implementation of the following policy measures ~~currently under consideration~~ for the Comprehensive Plan Framework would also help to avoid, minimize, and mitigate potential air quality, greenhouse gases, and climate impacts identified for the action alternatives:

- Improve indoor air quality for residents most susceptible to negative impacts from exposure to particulates, CO, nitrogen dioxide, and lead.
- Reduce emissions from buildings, structures, and infrastructure in the community.
- Avoid siting new housing near known stationary sources of air, water, heat and light pollution, and facilitate site and building design that mitigates impacts from stationary pollution sources for both new and existing housing.
- Minimize impacts of the urban heat island effect, reduce temperature disparities for equity priority neighborhoods, and safeguard vulnerable populations from the adverse effects of extreme heat through proactive measures.
- Prioritize integrating green infrastructure into new development, redevelopment, replacement of existing infrastructure, and development of public spaces within the City to reduce urban heat island effect.
- Ensure that buildings contribute to the City's greenhouse gas reduction goals, protect occupants from climate hazards and extreme weather, and minimize harm to wildlife and natural ecosystems.
- Expand community solar access for low-income homeowners and renters.
- Retrofit existing infrastructure, parks and natural spaces, and construct new facilities to adapt to the localized impacts that will occur in the community due to climate change.
- Improve active transportation infrastructure ~~particularly~~ in areas with inadequate pedestrian and micromobility infrastructure~~,~~ to increase the share of trips made by foot, bike, or other small mobility devices.
- Adopt new technologies and invest in supportive infrastructure to increase the adoption of electric, hybrid, and alternative fuel vehicles to reduce community emissions.
- Implement land use patterns that reduce VMT, traffic congestion and associated ~~, and~~ greenhouse gas emissions, ~~and~~ while improvinge ~~e~~ safety and air quality.
- Incorporate elements of climate resiliency into new privately and publicly developed public spaces.
- Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.

- Develop plans and resources to ensure effective emergency response and equal access to emergency services and recovery resources, mitigating risks from ~~extreme weather~~ natural disasters, climate-related hazards, and social ~~hazards~~ disruptions. Build resilience through strong community relationships and trusted local networks.

Significant Unavoidable Adverse Impacts

All of the alternatives have the potential to create impacts to air quality and GHG emissions as a result of expected population growth and development. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to air quality or GHG emissions are anticipated for any of the alternatives.

Water

Methodology

Analysts reviewed relevant information and policies to describe existing citywide surface water, flood plains, and groundwater conditions, including the following sources:

- City of Vancouver Shoreline Master Program (City of Vancouver 2021b)
- United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (USFWS 2024)
- EPA Clean Water Act, Clean Water Rule
- Washington State Department of Ecology Water Quality Atlas (Ecology 2024)
- VMC 14.24, Erosion Control
- VMC 14.25, Stormwater Control
- VMC 14.26, Water Resources Protection
- VMC 20.740.120, Frequently Flooded Areas
- VMC 20.740.140, Wetlands

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Potential for increased runoff to surface water bodies and wetland areas
- Potential for increased impacts to groundwater hydrology
- Potential for flooding in areas identified for new growth and development

Affected Environment

Vancouver has an abundance of water resources typical of western Washington, including rivers, streams, lakes, and wetlands. The ~~c~~City contains approximately 2,500 acres of

wetlands and 2,500 acres of water, as shown in ~~Figure 39~~ ~~Figure 39~~ Figure 41 (Design Workshop 2024).

Surface Water

Major surface waters include the Columbia River, Vancouver Lake, and the adjacent lowlands, and Burnt Bridge Creek (City of Vancouver 2021a). These three main waterbodies (Columbia River, Burnt Bridge Creek, and Vancouver Lake) are all considered impaired by pollutants by Ecology (Ecology 2024). The total area subject to the City's SMP is approximately 32,000 acres (50 square miles) (City of Vancouver 2021b). The two primary watersheds within the Vancouver city limits are Burnt Bridge Creek and Columbia Slope; with Vancouver Lake basin at the western boundary, Lacamas Creek watershed to the east, and Salmon Creek watershed to the north. All Vancouver watersheds ultimately drain into the Columbia River (City of Vancouver n.d.[a]).

Frequently Flooded Areas

Frequently flooded areas are areas of special flood hazard identified by the Federal Insurance Administrator and the Federal Emergency Management Agency (FEMA) (VMC 20.740.120). FEMA maintains flood maps that help to inform where locations of flood hazard occur. In Vancouver, flood hazards predominately exist along the banks of the Columbia River and its associated floodplain, surrounding Vancouver Lake and its associated floodplain, and within the floodplain of Burnt Bridge Creek, as shown in ~~Figure 39~~ ~~Figure 39~~ Figure 41 (Design Workshop 2024). Vancouver's floodplain is concentrated at the western edge of the city. The alluvial floodplain contains mostly marshes and hardwoods, while the upland floodplain includes various substantial woodlands of 20 to 30 acres or more (City of Vancouver 2022a).

Groundwater

All Vancouver drinking water comes from local groundwater (City of Vancouver n.d.[b]). Vancouver gets its drinking water, or potable water, from wells tapping three distinct regional underground aquifers – the Orchards, Troutdale and Sand-and-Gravel aquifers. These aquifers make up the Troutdale Aquifer System, which covers most of Clark County. The groundwater system was designated a sole source aquifer in 2006 (City of Vancouver n.d.[b]). EPA defines a sole source aquifer as one where (a) the aquifer supplies at least 50% of the drinking water for its service area and (b) there are no reasonable alternative drinking water sources if the aquifer becomes contaminated (EPA n.d.[a]).

Critical Aquifer Recharge Areas

Per VMC 14.26, the entire area within the boundary of Vancouver is designated as a Critical Aquifer Recharge Area. This designation recognizes the importance and vulnerability of Vancouver's drinking water aquifers and serves to protect and preserve the municipal water supply.

Stormwater

Vancouver's overall goal is to promote stormwater drainage designs that help maintain or improve surface and groundwater quality. In general, stormwater runoff drains to catch basins, storm drains, and roadside ditches. ~~Figure 39~~ ~~Figure 39~~ Figure 41 shows the location of stormwater lines, outfalls, and features throughout the city. The preferred approach to stormwater management is to require property owners to retain stormwater on site and treat it, often utilizing vegetated areas to filter and absorb pollutants (City of Vancouver 2021a). Runoff is collected and conveyed into larger storm drains within the major streets, and discharges into local creeks and drainage tributaries or infiltrates into the soils on site. Stormwater facilities are distributed throughout the ~~e~~City (City of Vancouver 2023d). The geology for most of the ~~e~~City allows stormwater to infiltrate on site, allowing sites to develop and provide water quality treatment and discharge to stand-alone infiltration systems.

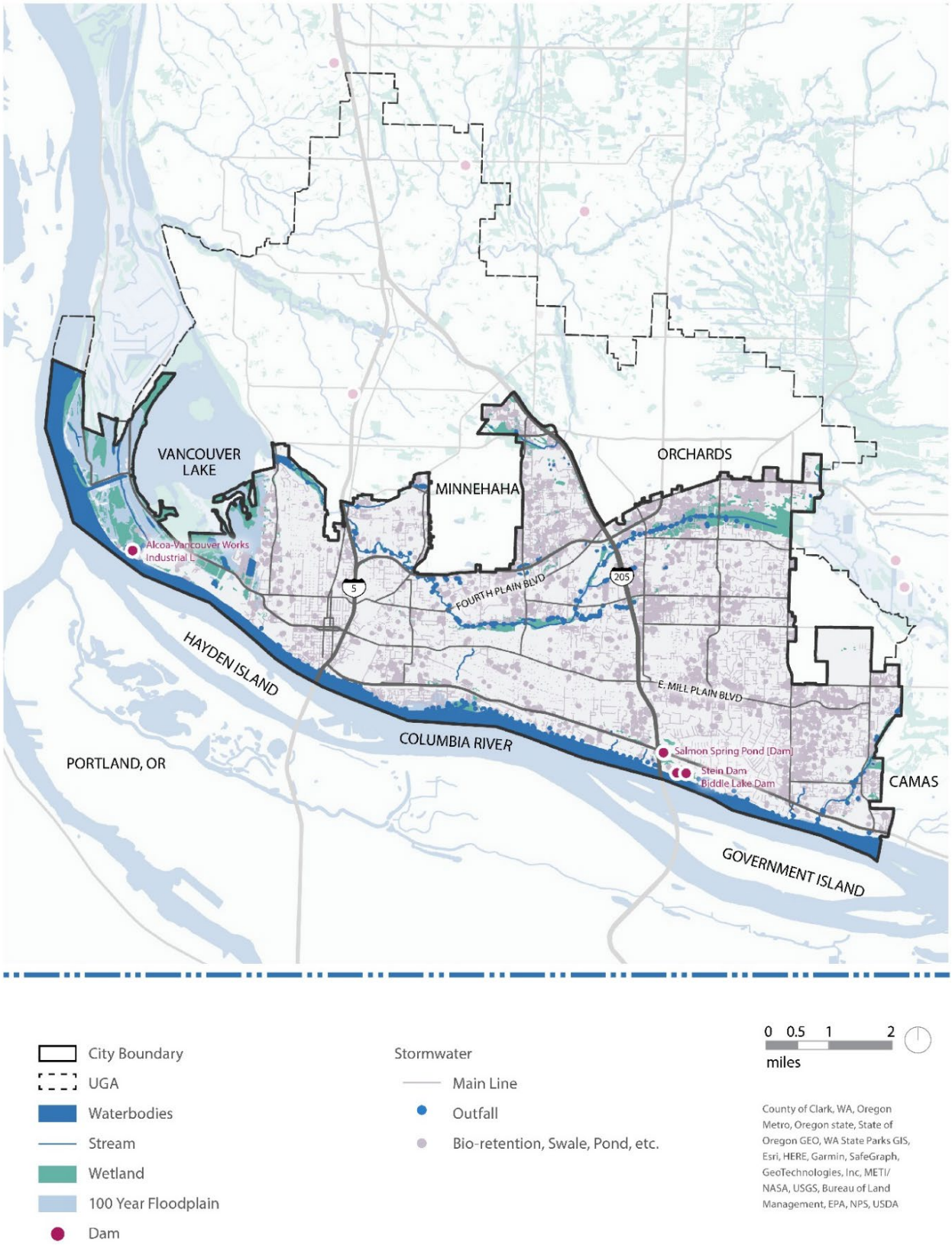
Wetlands

Wetlands are among the most productive ecosystems in the world, comparable to rain forests and coral reefs, and include areas where water covers soil for all or part of the year such as marshes, swamps, bogs, and fens (EPA n.d.[b]) Wetland functions are influenced by physical, chemical, and biological processes that occur within a wetland and the surrounding landscape. They provide essential ecological services including water filtration, shoreline stabilization, groundwater recharge, and climate resiliency. Wetland processes can alleviate flooding, improve stormwater control, provide erosion protection, and improve water quality valuable to the conservation and preservation of aquatic resources.

Wetland habitats are protected by several laws overseen by federal, state, and local agencies, and tribes. VMC, SEPA, and federal National Environmental Policy Act establish environmental regulations and procedures to regulate the development and use of land.

Vancouver contains over 2,467 acres of area mapped as wetlands according to the USFWS National Wetlands Inventory (USFWS 2024). Notable wetlands include the Water Resources Education Center Wetlands along the Columbia River, the restored wetlands in the Burnt Bridge Creek Greenway, and those surrounding Vancouver Lake, as shown in ~~Figure 39~~ ~~Figure 39~~ Figure 41.

~~Figure 39~~ Figure 41. Water Resources



Source: Design Workshop 2024

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following water-related metrics:

- Potential for increased runoff to surface water bodies and wetland areas
- Potential for increased impacts to groundwater hydrology
- Potential for flooding in areas identified for new growth and development

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Potential for Increased Runoff to Surface Water Bodies and Wetland Areas

All alternatives would lead to new construction or redevelopment, which would increase the amount of new impervious surfaces, including rooftops, driveways, sidewalks, parking lots, and compacted soils. Impervious surfaces in urban areas reduce natural infiltration of water into soils and increase surface water runoff, which can change the way that water and pollutants travel to urban streams and lead to increased erosion (EPA 2024a). Incremental development over time could also result in direct, indirect, and cumulative impacts to wetland hydrology, degradation during construction, and temporary or permanent loss of wetland habitat.

New development under all alternatives would be subject to current and future proposed regulations that may require improvements to stormwater management or critical area restoration as new development occurs. These requirements could have cumulative benefits for water resources, especially in areas of the City where stormwater management and other water resources protections do not meet current standards.

Potential for Increased Impacts to Groundwater Hydrology

Under all alternatives, increased impervious surface area and soil compaction could decrease opportunities for infiltration and groundwater recharge, affect natural drainage patterns, and prevent precipitation from recharging groundwater aquifers.

Groundwater could be impacted during standard construction activities, such as excavation, grading, and placement of foundations. Contaminated soil and/or groundwater could be encountered during excavation when properties are redeveloped under any of the alternatives. Some land uses are known to have a higher risk of groundwater contamination than other land uses, such as automotive facilities, dry cleaning facilities, municipal landfills, and some industrial or agricultural uses.

Potential for Flooding in Areas Identified for New Growth and Development

None of the alternatives would directly encourage new development in areas identified as frequently flooded areas. However, increases in the amount of impervious surfaces, as discussed in the previous sections, and more extreme weather events related to climate change could lead to increased flooding in the future under all alternatives.

No Action Alternative

In general, there would be minimal additional impacts under the No Action Alternative aside from those described in the Impacts Common to All Alternatives section. The No Action Alternative would be consistent with City regulations and would apply the updated CAO provisions for water resources.

Because the No Action Alternative would have less capacity for new housing and jobs, it may result in lower levels of new construction and/or redevelopment and associated increases in impervious surfaces, compared to Alternatives 1 and 2 and the Preferred Alternative. However, the No Action Alternative would encourage continuation of a less dense, more dispersed style of urban development. In the longer term, this type of development pattern could potentially increase pressure to develop more individual sites, which could result in increased impervious surfaces.

Alternative 1

In general, there would be minimal additional impacts under Alternative 1 aside from those described in the Impacts Common to All Alternatives section. Alternative 1 would be consistent with City regulations and would be subject to the updated CAO provisions for water resources.

Alternative 1 would allow for more dense development and would have greater capacity for new housing units and jobs, which would likely result in higher levels of new construction and/or redevelopment and the associated increases in impervious surfaces that affect runoff and water resources, compared to the No Action Alternative. However, this development would be more concentrated in higher-density zoning districts, which could result in lower levels of impervious surfaces throughout the ~~e~~City than the No Action Alternative.

Alternative 2

In general, there would be minimal additional impacts under Alternative 2 aside from those described in the Impacts Common to All Alternatives section. Alternative 2 would be consistent with City regulations and would be subject to the updated CAO provisions for water resources.

Alternative 2 would have similar impacts to Alternative 1 and the Preferred Alternative related to water resources. However, because Alternative 2 would have options for more density and larger-scale buildings in more areas of the city, it would have greater potential than Alternative 1, the Preferred Alternative and the No Action Alternative to increase impervious surface areas, which could affect runoff to water resources. However, like Alternative 1 and the Preferred Alternative, this development would be more concentrated in higher-density zoning districts, which could result in lower overall impervious surface areas throughout the ~~c~~City than the No Action Alternative.

Preferred Alternative

In general, there would be minimal additional impacts under the Preferred Alternative aside from those described in the Impacts Common to All Alternatives section. The Preferred Alternative would be consistent with City regulations and would be subject to the updated Critical Areas Ordinance (CAO) provisions for water resources.

The Preferred Alternative would have similar impacts to Alternatives 1 and 2 related to water resources. Similar to Alternatives 1 and 2, the Preferred Alternative would allow for more dense development and would have greater capacity for new housing units and jobs, which would likely result in higher levels of new construction and/or redevelopment and the associated increases in impervious surfaces that affect runoff and water resources, compared to the No Action Alternative. However, this development would be more concentrated in higher-density zoning districts, which could result in lower levels of impervious surfaces throughout the City than the No Action Alternative.

Avoidance, Minimization, and Mitigation Measures

Regardless of alternative, all future development projects will be required to adhere to local, state, and federal policies and regulations that protect surface water and groundwater resources, as well as protect public health and safety from flood hazards.

Development in frequently flooded areas and floodplains, such as those located along the Columbia River and in West Vancouver, will remain subject to VMC 20.40.120.

New development will also be required to comply with the City's Water Resources Protection Ordinance (VMC 14.26). This ordinance is currently being updated to address provisions of the Critical Aquifer Recharge Area regulations.

All development projects will be required to provide stormwater capture and conveyance on site in accordance with VMC 14.25 and 14.26.

New development will also be subject to the wetland regulations under VMC 20.740.140, including revised wetland buffer width requirements. With the December 2024 updates to VMC 20.740.140, about 4% more of the City's land area would be regulated as wetlands and subject to additional protections under all alternatives, which would benefit these water resources.

In addition, implementation of the following policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential impacts to water resources identified for the action alternatives:

- Improve ~~local~~ water quality and reduce flood risk by reducing stormwater ~~runoff~~ flows, promoting natural groundwater infiltration ~~to groundwater~~, reducing runoff, and advancing effective stormwater management system that protect watersheds. ~~and restoring riparian areas.~~
- Provide safe, clean, quality drinking water to every Vancouver home, business, and industry. Discourage development and use of private drinking water wells. Provide water pressures and volumes necessary to support fire suppression hydrants and sprinkler systems. Ensure that the infrastructure to support water service is in place prior to or at the time of development. Support water conservation recycle systems where practicable.
- Prioritize integrating green infrastructure into new development, redevelopment, replacement of existing infrastructure, and development of public spaces within the City to improve stormwater quality.
- Protect existing Critical Areas within the City, and Shorelines of Statewide Significance, and ensure no net loss of ecological functions through avoidance of impacts, conservation design principles, and compensatory mitigation when loss of ecological function cannot be avoided.
- Support restoration and enhancement of Critical Areas by private landowners, or through City/nonprofit acquisition and other initiatives.

The proposed updates to zoning and development regulations would also help to avoid, minimize and mitigate impacts to water through elements such as minimum open space requirements and maximum impervious area requirements based on building types.

Significant Unavoidable Adverse Impacts

All of the alternatives have the potential to create impacts to water resources as a result of expected population growth and development. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to water resources are anticipated for any of the alternatives.

Plants and Animals

Methodology

Analysts reviewed relevant information and policies to describe existing citywide conditions for plants, fish, and other wildlife, including the following sources:

- City of Vancouver Urban Forestry Management Plan (City of Vancouver 2023e)
- Clark County Maps Online Geographic information system Mapping Tool
- Endangered Species Act
- Our Vancouver Health Impact Assessment (BERK 2025)
- USFWS Information for Planning and Consultation mapping tool (USFWS 2024)
- VMC 12.04, Street Trees
- VMC 20.740.100, Habitats of Local Importance
- VMC 20.740.110, Fish and Wildlife Habitat Conservation Areas
- VMC 20.740.140, Wetlands
- VMC 20.770, Tree, Vegetation, and Soil Conservation
- Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species List (WDFW 2024)
- WDFW Anadromous and Resident Salmonid Distribution Maps in the Salmon and Steelhead Habitat Inventory Assessment Program

Analysts then reviewed the alternatives to determine potential adverse impacts and associated mitigation measures using the following metrics:

- Potential impacts to fish, wildlife, or plant populations and habitat
- Potential impacts to tree canopy and vegetation

Affected Environment

Wildlife Habitat and Priority Species

The City identifies Fish and Wildlife Habitat Conservation Areas (VMC 20.740.110) as:

- Habitat used by any life stage of state or federally designated endangered, threatened, and sensitive fish or wildlife species
- Priority habitats and areas associated with priority species
- Water bodies including lakes, streams, rivers, and naturally occurring ponds
- Habitats of Local Importance, which are not designated as Priority Habitats and Species by the state but are designated as locally significant by the City
- Riparian Management Areas and Riparian Buffers, which are regulated areas that include the land from the ordinary high-water mark to a specified distance as measured horizontally in each direction. The Riparian Management Area is adjacent to a lake, stream or river, and the Riparian Buffer is adjacent to the Riparian Management Area.

WDFW identifies priority habitats and species to ensure protection and management. Priority habitats in Vancouver include biodiversity areas and corridors, riparian areas, freshwater wetlands, caves or cave-rich areas, and Oregon white oak woodlands (WDFW 2024).

According to the WDFW's priority habitat and species mapping tool, priority species that may occur within the City include (WDFW 2024):

- Coho salmon (*Oncorhynchus kisutch*)
- Winter steelhead (*Oncorhynchus mykiss*)
- Bull trout (*Salvelinus confluentus*)
- Green sturgeon (*Acipenser medirostris*)
- Spring Chinook (*Oncorhynchus tshawytscha*)
- Fall chum (*Oncorhynchus keta*)
- Great blue heron (*Ardea herodias*)
- Bald eagle (*Haliaeetus leucocephalus*)
- Vaux's swift (*Chaetura vauxi*)
- Waterfowl concentrations

The USFWS Information for Planning and Consultation system identifies the following Endangered Species Act-listed species that may occur within the City (USFWS 2024):

- Columbian white-tailed deer (*Odocoileus virginianus leucurus*)
- Northern spotted owl (*Strix occidentalis caurina*)
- Yellow-billed cuckoo (*Coccyzus ameicanus*)
- Northwestern pond turtle (*Actinemys marmorata*)
- Bull trout (*Salvelinus confluentus*)
- Monarch butterfly (*Danaus Plexippus*)

Approximately 14% of the ~~c~~City is considered riparian habitat, priority habitat area, or priority species area based upon existing county, state, and federal data (Design Workshop 2024). Priority habitat areas are located primarily in the center of the ~~c~~City along Burnt Bridge Creek as well as on the far east side of the ~~c~~City adjacent to Camas. Most of the priority species areas are located along the west side of the ~~c~~City.

Riparian habitat areas are situated adjacent to aquatic habitat and are transitional areas that contain elements of both aquatic and upland ecosystems, which mutually influence each other. Riparian habitat areas are located along Burnt Bridge Creek and the Columbia River. Freshwater wetland areas are mapped throughout the city. Biodiversity areas and corridors are areas of habitat that are relatively important to various species of native fish and wildlife. A biodiversity area and corridor is mapped within the ~~c~~City associated with Burnt Bridge Creek, as shown in ~~Figure 40~~ ~~Figure 40~~ Figure 42.

The City also has provisions in its code for identifying habitats of local importance (VMC 20.740.100), which are critical areas for fish and wildlife habitat that are not designated as priority habitats and species by the state but are designated as locally significant. These are determined by a need for protection due to existing high diversity of fish or wildlife species, declining populations, habitat scarcity, areas sensitive to disturbance from human activity or development, or other unique local habitat functions. Designated areas also need to be sufficient in size to support the species or habitat functions, and this designation will not compromise the ability of the City to achieve Comprehensive Plan goals. A habitat of local importance must also have a proposed management strategy that describes how the functions of the habitat will be protected after designation. The City has not designated any habitats of local importance.

Aquatic Resources

As discussed further in the Water section and shown on ~~Figure 39~~ ~~Figure 39~~ Figure 41, major aquatic resources in and near Vancouver include Burnt Bridge Creek, the Columbia River, and Vancouver Lake, as well as smaller rivers, streams, and wetlands. There are approximately 2,467 acres of wetland areas and 2,524 acres of water, which includes rivers, streams, and lakes, within the ~~c~~City (Design Workshop 2024).

Portions of the ~~c~~City that have prevalent wetland areas are along the banks of the Columbia River, Vancouver Lake, Burnt Bridge Creek, Fisher Creek, and Love Creek; areas between Vancouver Lake and the Columbia River; Curtin Springs Wildlife Habitat; Vancouver Lake Park; Centerpointe Park; areas west of Northeast Padden Parkway and Northeast Andresen Road; areas in the Port of Vancouver; and other mapped areas (Clark County n.d.).

~~Figure 40~~ Figure 42. Biodiversity Areas and Corridors



Source: Clark County n.d.

Fish or Wildlife Migration Routes

The ~~e~~City is an important stop for birds traveling along the Pacific Flyway and fish traveling along the larger Lower Columbia region fish migration route (WDFW 2024).

The Pacific Flyway is the major north–south route for migratory birds that extends from Patagonia to Alaska, and migratory birds may use a variety of habitats within the City for resting, feeding, and breeding.

In general, due to the number of species that rely on the Columbia River as a migratory corridor, and the variety of life history strategies among these species, both adult and juvenile salmonids are likely to be present in portions of the Columbia River and other rivers and streams within or near the ~~e~~City year-round.

Tree Canopy

Trees offer structural diversity that provides habitat for a wide range of species; areas in the ~~e~~City with extensive tree canopy cover are likely to support comparatively diverse plant and animal communities. Vancouver's 6,000 acres of tree canopy is composed primarily of Douglas fir (*Pseudotsuga menziesii*), western red cedar (*Thuja plicata*), western hemlock (*Tsuga heterophylla*), bigleaf maple (*Acer macrophyllum*), and red alder (*Alnus rubra*) (City of Vancouver 2021a).

With continuously updated data on tree canopy cover and impervious surfaces, the City can make informed decisions about tree planting and preservation, stormwater management, land use and the benefits trees provide. The ~~e~~City has continuously been recognized as a Tree City USA by the National Arbor Day Foundation, in partnership with the U.S. Forest Service and Washington State Department of Natural Resources Urban and Community Forestry Program. This recognition reflects Vancouver's commitment to effective management and care for its urban tree canopy (Vancouver's Downtown Association n.d.).

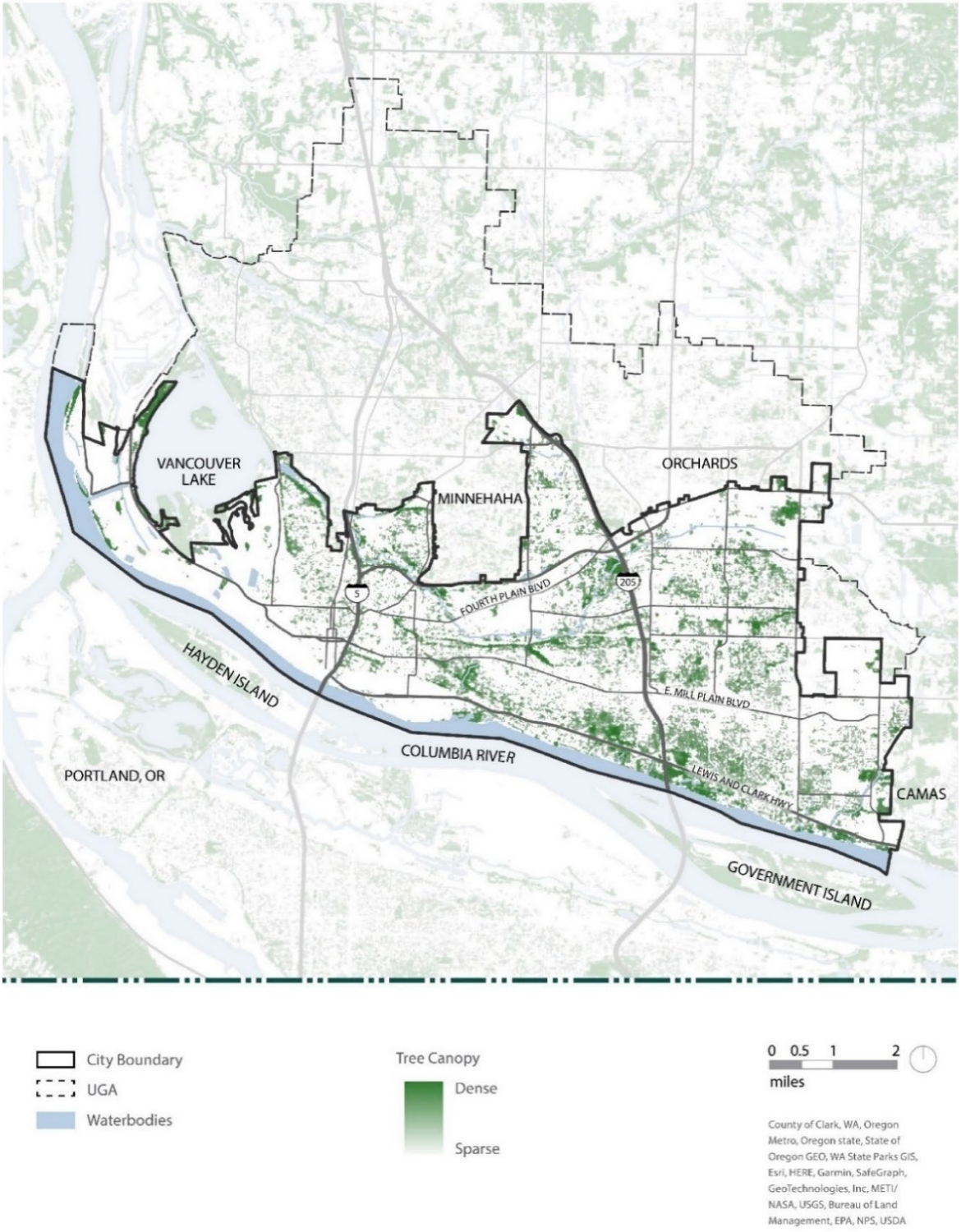
The 2011 Comprehensive Plan established a goal of 28% tree canopy cover by the year 2030 (City of Vancouver 2021a). As of October 2023, the City reported 20% tree canopy cover, representing a small increase from 2010 (City of Vancouver 2023e).

Tree canopy ranges from 40% in the Dubois Park neighborhood to 9% in the Esther Short neighborhood (City of Vancouver 2023e). As shown in ~~Figure 41~~ ~~Figure 41~~ Figure 43, the densest tree canopy is concentrated in the southeast near the banks of the Columbia River. There are substantial gaps in tree canopy moving west along the river. Tree canopy is more prevalent between the center and the east of the city. Dense tree canopy is concentrated along SR 14 and Burnt Bridge Creek. Tree canopy is sparser in residential and industrialized neighborhoods.

The Urban Forestry Management Plan, published in October 2023, outlines a long-term framework to preserve Vancouver's urban forest, achieve tree canopy coverage goals and address environmental injustice (City of Vancouver 2023e). In addition, the City's December

2024 CAO update outlines new requirements for protection of priority Oregon white oak habitat and associated mitigation measures for development.

~~Figure 41~~ Figure 43. Tree Canopy Concentration



Source: Design Workshop 2024

Potential Impacts

This section discusses the potential impacts of the alternatives related to the following plants and animals metrics:

- Potential impacts to fish, wildlife, or plant populations and habitat
- Potential impacts to tree canopy and vegetation

Impacts Common to All Alternatives

The following sections outline impacts that are expected to occur under all the alternatives. Impacts specific to each alternative are discussed in the next subsections.

Potential Impacts to Fish, Wildlife, or Plant Populations and Habitat

All alternatives would permit development that could impact plants and animals directly, indirectly, or cumulatively. Over time, loss of wildlife habitat and/or fragmentation could occur under all alternatives because of cumulative increases in impervious surface areas and removal of native vegetation, although many areas that would experience redevelopment are already fully or partially developed today. The extent of impacts to plants and animals would depend on the location and intensity of development, and the existing size of habitat and connectivity across the landscape.

Future site-specific development projects under all alternatives could result in adverse impacts on vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands. However, those projects will be subject to existing federal, state, and local regulations that protect plant and animal habitat, threatened and endangered species, and aquatic resources and wetlands, as discussed in the Avoidance, Minimization, and Mitigation Measures section.

Potential Impacts to Tree Canopy and Vegetation

Under all alternatives, future development activities would require removal of vegetation to varying extents. Loss of vegetation would result in direct, indirect and cumulative impacts to plant and animal species through changes in habitat. These changes would be incremental over time as development occurs.

Overall tree canopy coverage within the ~~e~~City has the potential to decrease to some extent under all alternatives because of tree removal associated with new development. All alternatives would maintain the same amount of existing land designated as Parks/Open Space, which would preserve the tree canopy and prevent vegetation loss in those areas.

All of the alternatives would provide the majority of their capacity for new housing units in areas with low existing tree canopy cover, defined as census tracts with less tree canopy than the current ~~c~~City average, as shown in Table 38.

Table 38. Estimated Capacity for New Housing Units in Areas with Low Existing Tree Canopy Cover

Metric	No Action	Alternative 1	Alternative 2	Preferred Alternative
Projected Capacity for New Housing Units in Areas with Low Existing Tree Canopy	16,800[a]	27,800	31,000	28,100
Percent of Total Projected Capacity for New Housing Units	57%[a]	62%	61%	58%

Source: BERK 2025

Note:
a The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

No Action Alternative

In general, there would be minimal additional impacts under the No Action Alternative aside from those described in the Impacts Common to All Alternatives section. The No Action Alternative would be consistent with City regulations and would apply the updated CAO provisions related to plants and animals.

Because the No Action Alternative would have less capacity for new housing and jobs, it may result in lower levels of new construction and/or redevelopment and associated direct, indirect, and cumulative impacts to habitat areas compared to Alternatives 1 and 2 and the Preferred Alternative.

Alternative 1

In general, there would be minimal additional impacts under Alternative 1 aside from those described in the Impacts Common to All Alternatives section. Alternative 1 would be consistent with City regulations and would apply the updated CAO provisions related to plants and animals.

Alternative 1 would allow for more dense development and would have greater capacity for new housing units and jobs, which would likely result in higher levels of new construction and/or redevelopment and associated vegetation removal, compared to the No Action Alternative. However, this development would be more concentrated in higher-density zoning districts, which could help to reduce the need for vegetation removal throughout the ~~e~~City compared to the No Action Alternative and have potentially greater direct, indirect, and cumulative benefits for plants and animals. Because Alternative 1 would accommodate more new development and/or redevelopment than the No Action Alternative, more projects would be subject to the new additional regulations for wetland buffers, riparian areas, and preservation of priority habitats in the December 2024 CAO update, which could result in greater benefits for plants and animals.

Alternative 2

In general, there would be minimal additional impacts under Alternative 2 aside from those described in the Impacts Common to All Alternatives section. Alternative 2 would be consistent with City regulations and would apply the updated CAO provisions for water resources.

Alternative 2 would have similar impacts to Alternative 1 and the Preferred Alternative related to plants and animals. However, because Alternative 2 would have options for more density and larger-scale buildings in more areas of the city, it would have greater potential than Alternative 1, the Preferred Alternative and the No Action Alternative to increase impervious surface areas and remove vegetation, affecting habitat. This increased growth in more areas, particularly in Central and East Vancouver, could place more development near Fish and Wildlife Habitat Conservation Areas, including state priority species and habitats. Denser development patterns, including Medium-Scale and Mixed-Use Neighborhoods, would be allowed near Burnt Bridge Creek and its Biodiversity Area in West and Central Vancouver under Alternative 2 compared to Alternative 1 and the No Action Alternative.

However, those projects will be subject to existing regulations that protect plant and animal habitat, threatened and endangered species, and aquatic resources and wetlands. Because Alternative 2 would accommodate the greatest amount of new development and/or redevelopment, more projects would be subject to the additional regulations for wetland buffers, riparian areas, and preservation of priority habitats in the December 2024 CAO update, which could result in the greatest direct, indirect, and cumulative benefits for plants and animals.

Preferred Alternative

In general, there would be minimal additional impacts under the Preferred Alternative aside from those described in the Impacts Common to All Alternatives section. The Preferred Alternative would be consistent with City regulations and would apply the updated CAO provisions for water resources.

Similar to Alternatives 1 and 2, the Preferred Alternative would allow for more dense development and would have greater capacity for new housing units and jobs, which would likely result in higher levels of new construction and/or redevelopment and associated vegetation removal, compared to the No Action Alternative. The Preferred Alternative would have similar impacts to Alternatives 1 and 2 related to plants and animals, depending on area of the city. Citywide, impacts under the Preferred Alternative would be more similar to Alternative 1 than Alternative 2 based on anticipated growth levels.

Similar to Alternative 2, denser development patterns, including Medium-Scale and Mixed-Use Neighborhoods, would be allowed near Burnt Bridge Creek and its Biodiversity Area in West and Central Vancouver under the Preferred Alternative compared to Alternative 1 and the No Action Alternative. However, those projects will be subject to existing regulations that protect plant and animal habitat, threatened and endangered species, and aquatic resources and wetlands. Because the Preferred Alternative would accommodate more new development and/or redevelopment than the No Build Alternative, more projects would be subject to the additional regulations for wetland buffers, riparian areas, and preservation of priority habitats in the December 2024 CAO update, which could result in greater direct, indirect, and cumulative benefits for plants and animals.

Avoidance, Minimization, and Mitigation Measures

Regardless of alternative, all future development projects will be required to comply with city, state, and federal requirements for protecting plants, animals, and their resources and resulting in no net loss of functions and values in critical areas. These existing regulations include the Endangered Species Act, Clean Water Act and Stormwater Regulations, state regulations protecting Waters of the State, the Shoreline Management Act, the Shoreline Master Program, the City's CAO (VMC 20.740), the City's tree ordinance (VMC 12.04), and stormwater regulations (VMC 14.25 and 14.26).

The City's development review process will ensure compliance with the City's CAO, VMC 20.740, which requires any development, redevelopment, or use of a property to protect ecologically sensitive areas and their functions and values, while also allowing for reasonable use of property. VMC 20.740.110 focuses on protecting Fish and Wildlife Habitat Conservation Areas by designating key habitats such as riparian areas, priority Oregon white

oak habitats, and aquatic environments. VMC 20.740.140 includes buffer requirements from wetlands, which often provide critical wildlife habitats and water quality benefits that impact the ecosystem as a whole.

The City's December 2024 CAO update provides additional protections for plant and animal habitat. In addition to the additional wetland protections discussed in the Water section, there would be increased widths for riparian areas, resulting in about 1% more land (303 acres) regulated as riparian areas as compared to the previous CAO. Overall, the December 2024 CAO update decreases the amount of land available for development through these expanded buffers.

In addition, implementation of the City's Urban Forestry Management Plan will help to enhance the level of tree canopy cover citywide, which can help to reduce stormwater and flooding damage, improve air quality, provide habitat, and improve health outcomes (City of Vancouver 2023e). Continued updates to this plan under all of the alternatives will help to identify areas of the ~~e~~City that have fewer trees than others and develop strategies to help increase the tree canopy in these areas.

Implementation of the following policy measures ~~currently under consideration~~ for the Comprehensive Plan Update would also help to avoid, minimize, and mitigate potential impacts to plants and animals identified for the action alternatives:

- Meet tree canopy coverage goal of 28%, using the City's Equity Index to target investment in underserved neighborhoods lacking coverage.
- Take inventory of and protect climate refugia and fish and wildlife habitat needs for species under stress from climate change.
- Prioritize integrating green infrastructure into new development, redevelopment, replacement of existing infrastructure, and development of public spaces within the City to improve stormwater quality and reduce urban heat island effect.
- Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide-free landscaping, enhancing biodiversity, and connecting natural spaces across the ~~e~~City through pollinator-friendly plantings.
- Incorporate native plantings, food forests, and agroforestry into parks and public spaces to support food security, ecological health, and cultural knowledge sharing.
- Create an expansive network of linear parks that encourage active transportation, improve community health and wellbeing, enhance tree canopy and stormwater management, and link parks and open space with housing.

The proposed updates to zoning and development regulations would also help to avoid, minimize and mitigate impacts to plants and animals through elements such as minimum open

space requirements and maximum impervious area requirements based on building types. The City is also developing code incentives to support maintaining larger trees and planting more trees than required as part of new developments.

Significant Unavoidable Adverse Impacts

All of the alternatives have the potential to create impacts to earth resources as a result of expected population growth and development. The anticipated changes would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to plants and animals are anticipated for any of the alternatives.

Chapter 5: Potential Cumulative Effects

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. New content in this chapter is generally denoted with underlined text, while changes to information are denoted with strikethrough text. Updates focus on adding the new analysis of the Preferred Alternative, as well as minor corrections and clarifications to the analysis presented in the Draft EIS.

SEPA requires a nonproject EIS to include analysis of cumulative effects, which are the impacts of a proposed action – in this case, the Comprehensive Plan Update and associated zoning code amendments – in combination with other past, present, and reasonably foreseeable future actions within a given geographic area.

The proposed Comprehensive Plan Update would lead to future site-specific residential, commercial, industrial, and mixed-use development projects throughout the City with the potential for cumulative environmental impacts over time. Because the exact nature and timing of these future projects is currently unknown, specific cumulative impacts cannot be fully anticipated.

Cumulative effects are discussed where feasible in the Potential Impacts subsections of the built and natural environmental topics in Chapters 3 and 4. The regional transportation model outputs used for the transportation, noise, and air quality analyses discussed in Chapters 3 and 4 consider assumptions about future population and employment growth, expected changes in land use, and reasonably foreseeable future transportation projects. Therefore, these effects analysis inherently account for cumulative effects resulting from the Comprehensive Plan Update.

In general, it is anticipated that projects resulting from the Comprehensive Plan Update and revised zoning and development regulations would result in cumulative impacts over time, including higher levels of traffic volumes, noise, light, glare, impervious surfaces, and demand for various public services and utilities. Alternatives 1 and 2 and the Preferred Alternative would have the greatest potential for these types of cumulative impacts compared to the No Action Alternative because they would accommodate the highest capacities for new housing and jobs and would likely generate more construction and development projects in more areas of the City.

However, Alternatives 1 and 2 and the Preferred Alternative would also have greater potential for cumulative benefits over time compared to the No Action Alternative. The action alternatives would result in greater opportunities for ~~generally~~ more housing at higher

densities with ~~greater~~ increased benefits for overall housing affordability. ~~Both~~ The action alternatives would promote a trend of denser, more compact, mixed-use development in more areas of the city, which may lead to less pressure to develop historic and archaeologically sensitive areas and/or environmentally sensitive areas, such as geologic hazard areas and wetland and stream buffers. In addition, by accommodating the greatest amount of new development and/or redevelopment, more individual projects under Alternatives 1 and 2 and the Preferred Alternative would be subject to the City's updated critical areas regulations, which are designed to enhance environmental quality, prevent natural hazards, and ensure no net loss of critical area functions. Therefore, Alternatives 1 and 2 and the Preferred Alternative could result in fewer cumulative impacts on historic and cultural preservation, earth, water, and plants and animals than the No Action Alternative. Existing regulations, including the recent CAO updates, would help to avoid, minimize and mitigate cumulative impacts under all alternatives but may not eliminate these impacts entirely. Future projects and developments would be required to conduct separate, project-specific environmental analyses and review, as appropriate (unless otherwise exempt or covered through planned action SEPA ordinances). Mitigation measures would be identified for these future projects as applicable to decrease the potential for cumulative impacts.

Chapter 6 Draft EIS Comment Summary and Responses to Comments

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. In previous chapters, new content is generally denoted with underlined text, while changes to information are denoted with strikethrough text. Updates focus on adding analysis of the Preferred Alternative, with minor corrections and clarifications to the analysis presented in the Draft EIS. Some changes are denoted with footnotes and table notes when further explanation was warranted. Because Chapter 6 is a new section prepared especially for the Final Environmental Impact Statement, it is presented without the underline/strikethrough formatting.

About the Draft EIS Comment Period

The Draft EIS Comment period was open from July 8 to September 8, 2025. Comments were collected via an online comment form available in English, Chinese, Chuukese, Russian, Spanish, Ukrainian, and Vietnamese, as well as via phone, email, and mail. For a full summary of outreach conducted before and during the Draft EIS comment Period, refer to Appendix D, Draft EIS Comment Period Outreach Summary.

Comments Received

The City received a total of 440 comments:

- 330 total comments via the online comment form, of which 24 were incomplete forms and did not contain a comment.
- 94 comments via email, 6 of which were also submitted via the online comment form or physical mail
- 15 comments via physical mail, 1 of which was also submitted via the online comment form or email
- 1 comment via voicemail

A total of 409 unique comments were received. Thirteen of these were received from agencies, businesses, or organizations.

Comment Review Process

The project team reviewed each comment and coded responses based on the chapters of the Draft EIS. The project team also added additional codes to capture comments related to

the Draft EIS and Comprehensive Plan Update process. Comments were coded into multiple categories as overlap occurred. The City considered each comment and incorporated resulting corrections, additions, or clarifications of information into this Final EIS.

- Alternatives
- Land and Shoreline Use
- Housing
- Aesthetics
- Historic and Cultural Preservation
- Transportation
- Noise
- Public Services and Utilities
- Earth
- Air Quality, Greenhouse Gases, and Climate
- Water
- Plants and Animals
- Other – Draft EIS Information, Data, and Approach
- Other – Engagement Process
- Other – Policies and Implementation
- Other – Annexation
- Other – Unrelated to project

An additional sub-code was added for Alternatives to capture comments related to how alternatives impact a specific address, parcel, or neighborhood.

The summary section that follows may quantify comments received by the terms "few," "some," or "many." Few means less than 10 comments received; Some or several means between 10-39 comments received; and Many means 40 or more comments received on a particular topic.

Summary of Key Themes

This section provides a high-level summary of key themes and takeaways associated with each code, as well as how many comments pertained to each code. Refer to Appendix E, Responses to Individual Draft EIS Comments, to view the full text of comments received and the City's responses.

Alternatives: Specific Address, Parcel, Or Neighborhood (226 comments)

Many comments included suggestions for modifications to a specific address, parcel, or neighborhood in one or both alternatives. Frequently mentioned areas included the Southcliff and Fisher's Landing neighborhoods and the downtown waterfront area.

Alternatives (114 comments)

Alternative 1 received some support from those who expressed concerns about rapid change, parking, traffic, neighborhood character, and dense development. Some comments indicated support for Alternative 2 as the best way to address housing, climate, and

transportation needs. Some comments indicated support for both alternatives. Many comments indicated opposition to both alternatives.

Transportation (95 comments)

Many comments mentioned a desire for increased transit and connectivity, and pedestrian and bike improvements. A few comments indicated concern about parking shortages amidst higher density, opposition to MAX light rail expansion, and frustration with downtown pay-to-park policies.

Land and Shoreline Use (82 comments)

Some comments shared support for density that creates walkable, mixed-use areas, locating jobs, services, and restaurants or grocery stores closer to neighborhoods. A few comments opposed mixing low- and medium- density zones and increasing industrial land uses; emphasized a desire for protecting farmland and open space; and highlighted conflicts between public zoning changes and private neighborhood covenants.

Plants and Animals (43 comments)

Comments called for better protection of tree canopy, wildlife corridors, and natural habitats and indicated concern regarding vegetation loss due to increased density.

Housing (39 comments)

Some comments indicated a desire for a variety of housing options, affordable housing, and homeownership opportunities. Some comments expressed opposition to high-density housing, citing traffic, parking, and neighborhood impacts to character and safety.

Historic and Cultural Preservation (31 comments)

Some comments mentioned a desire to preserve older brick buildings in Downtown, Fort Vancouver, and Pearson Airfield. There were also a few suggestions to recognize the unique history of Vancouver and partner with Indigenous nations to preserve and honor their history as part of the city's story and legacy.

Other – Draft EIS information, data, and approach (25 comments)

Some comments included concerns that the EIS analysis does not adequately evaluate combined impacts of rezoning and middle-ground options between the two Alternatives. A few questions about the analysis related to houselessness, tree canopy, Critical Areas Ordinance, and rezoning were also shared.

Aesthetics (24 comments)

Comments emphasized the importance of neighborhood character, cohesive, high-quality development, and concerns about graffiti, trash, and homelessness.

Public Services and Utilities (18 comments)

Comments mentioned concerns that existing public services, including schools, police, fire, emergency services, and parks, are strained and will not be able to keep up with demand as the City grows.

Other – Engagement Process (16 comments)

Comments included concerns that engagement did not fully reach all demographics (especially renters, non-English speakers, low-income residents, and those without internet access), information shared was difficult to understand, and input was being overlooked.

Air Quality, Greenhouse Gases, and Climate (14 comments)

Comments included support for growth along transit lines to reduce vehicle miles travelled, concern about air pollution near freeways and industrial zones, and calls to increase climate resiliency through tree canopy, open space preservation, and solar power.

Noise (14 comments)

Comments mentioned noise concerns associated with traffic, mixed-use rezoning, and industrial traffic, and expressed a desire for noise barriers and protections.

Water (13 comments)

Comments mentioned concerns about stormwater runoff and pollution, increasing areas of impervious surfaces, and groundwater availability in the future.

Other – Unrelated to Project (8 comments)

Comments were unrelated to the Comprehensive Plan update, including feedback related to the Interstate Bridge Replacement Program.

Other – Annexation (5 comments)

Comments included questions from residents outside City limits about how their areas will be managed, desire for increased communication regarding the annexation process, and concerns that annexation could result in increased congestion and taxes.

Other – Policies and Implementation (3 comments)

Comments included skepticism about how the rezoning process will be implemented, desire for building permits to include requirements for parking and natural space, and emphasized the need for regulation of small electric vehicle use in bike lanes.

Earth (1 comment)

Comment shared concern about whether geologic and environmental hazards related to increased housing and commercial density in Southcliff were adequately considered.

Demographics of Commenters

The online comment form contained additional optional demographic questions. The following subsections summarize demographics of individuals who chose to respond to these questions.

Zip Codes

Respondents (300 total responses) came from 24 zip codes, including the City of Vancouver and surrounding areas in the urban growth boundary, Camas, and Washougal.

Gender

The gender breakdown of respondents to this question (275 total responses) is as follows:

- Female, 45.5% (125)
- Male, 40.0% (110)
- Non-binary, 0.4% (1)
- Transgender, 0.7% (2)
- Prefer not to answer, 14.0% (39)
- Self-identified, 0.7% (2)

Age

More than half of responses to this question (255 total responses) came from respondents over the age of 55. The age breakdown of respondents is as follows:

- Under 18 years, 1.2% (3)
- 18 – 24 years, 2.0% (5)
- 25 – 34 years, 7.8% (20)
- 35 – 44 years, 16.9% (43)
- 45 – 54 years, 12.9% (33)

- 55 – 64 years, 18.4% (47)
- Over 65 years, 40.8% (104)

Race/Ethnicity

Most respondents to this question (about 62% of 271 total responses) identified as white or European American. The racial/ethnic breakdown of respondents is as follows:

- American Indian or Alaska Native, 0.7% (2)
- Asian or Asian American, 4.4% (12)
- Black or African American, 1.9% (5)
- Hispanic or Latino/a/e, 4.4% (12)
- Middle Eastern or North African, 0.4% (1)
- Native Hawaiian or Pacific Islander, 0% (0)
- White or European American 61.6% (167)
- Other, 2.2% (6)
- Prefer not to answer, 26.9% (73)

Language

About half of respondents to this question (223 total responses) said that they only speak English fluently, while about one-third of respondents selected prefer not to respond. The most common language spoken by participants other than English was Spanish (about 8%). No responses were received in a language other than English.

Income

The income breakdown of respondents to this question (271 total responses) is as follows:

- Below $19,999, 0.7% (2)
- $20,000 – $49,999, 3.7% (10)
- $50,000 – $89,999, 11.1% (30)
- $90,000 – $129,999, 11.4% (31)
- $130,000 – $149,999, 4.1% (11)
- Above $150,000, 23.3% (63)
- Prefer not to answer, 45.8%, (124)

Disability

Approximately 9% of respondents to this question (274 total responses) report have a disability.

Housing Situation

About three-quarters of respondents to this question (275 total responses) own their home. Roughly 11% of respondents rent, and about 2% live with someone but do not pay rent.

Responses to Common Draft EIS Comment Themes

The City prepared the following responses to common comments received on the Draft EIS. Refer to Appendix E, Responses to Individual Draft EIS Comments, for a full listing of commenters and responses to individual comments.

Common Response #1: Selection of Preferred Alternative

The City received comments that expressed preferences for the No Action Alternative, Alternative 1, and/or Alternative 2 as presented in the Draft EIS.

Since publication of the Draft EIS, the City has developed a Preferred Alternative, which combines features of Alternatives 1 and 2 to meet projected housing and employment needs through 2045, manage long-term growth, and balance development with preservation of the natural environment. Chapter 2 of the Final EIS provides a detailed description of the Preferred Alternative, including land use maps, and compares the major features of the Preferred Alternative to Alternatives 1 and 2. Chapter 1 of the Final EIS provides a summary comparison of the potential impacts of all alternatives, with more detail for each environmental topic area in Chapters 3, 4, and 5.

The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. This approach includes facilitating growth in established urban areas so that agricultural and resource lands outside the City and Vancouver Urban Growth Area can be preserved for agricultural and environmental functions.

Similar to Alternatives 1 and 2, the Preferred Alternative includes increases in allowed residential density and building scale that are needed to accommodate projected population growth and state-mandated housing and jobs targets. The plan must accommodate about 38,000 new housing units, including about half at below-market levels, to meet the needs of current and future residents and to comply with state law (2021 H.B. 1220). The Land and Shoreline Use section and the Housing section in Chapter 3 of the Final EIS provide more information about the potential for the different alternatives to meet housing targets and needs.

Some growth and change are inevitable, and the City cannot prevent people from moving to Vancouver. The No Action Alternative would make no changes to the existing Comprehensive Plan goals and policies or citywide zoning regulations, with the exception that the legally mandated changes to allow four to six units on all residential lots will go into effect even if the City makes no changes because the state would override local regulations. Even with this, the absence of any other changes to accommodate long-term growth would make the City non-compliant with other housing laws under the Growth Management Act, including H.B. 1220 requirements to accommodate a set number of units affordable at various income levels. Failure to comply with state law would render the City ineligible for state grant funds and subject to other potential sanctions or penalties. Failure to allow enough housing of various types and sizes citywide would also worsen the existing housing affordability crisis for current and future residents. Thus, an updated Comprehensive Plan, land use map, and zoning code are necessary to appropriately plan for and accommodate growth and change.

The Preferred Alternative and proposed updated Comprehensive Plan and zoning code provide a framework to guide growth and change responsibly over the next 20 years (through 2045), with minor annual updates to the plan and code as needed to adapt to changing conditions or new information during that timeframe. Planning helps growth align with community values, state laws such as the Growth Management Act, and long-term City goals like climate action, opportunity for all, and community safety.

The Preferred Alternative represents the potential for substantial change in the community. However, the Preferred Alternative is a proposed citywide plan involving policy and regulatory change, not a City-led development project. Changes resulting from the plan and code updates are expected to occur incrementally over the next 20 years. Changes are expected to be gradual, localized, and informed by policies, market forces, and individual property owner choices.

The Preferred Alternative balances a range of considerations and reflects:

- Information from the Draft EIS analysis
- Community input, including comments submitted during the Draft EIS comment period in summer 2025
- State laws for growth management, housing, climate and other topics
- City priorities
- Direction from City Council

The following framework was used to draft the Preferred Alternative. See the September 15, 2025 City Council Workshop for additional information.

- **Draft Environmental Impact Statement (Draft EIS) Comments:** Incorporate comments and requests that are consistent with Council policy direction and state law.
- **Centers & Corridors:** Move from broad rules to location-specific analysis
- **Schools:** Ensure growth does not worsen school-specific capacity issues.
- **Tree Canopy:** Identify areas with significant mature tree canopy.
- **Parks & Community Services:** Prioritize additional housing capacity near parks and schools.
- **Industrial Employment Lands:** Carefully manage employment land.
- **Service Deserts:** Use the Connected & Accessible Neighborhoods map to locate areas without access to essential services.
- **Reducing vehicle miles traveled (VMT) & Emissions:** Prioritize land use strategies and mixes that reduce trip length and support different trip types.
- **Public Facilities and Services:** Leverage existing infrastructure and areas planned for capital upgrades in the future.
- **Transportation:** Leverage existing and planned transportation investments to locate growth near upgraded, multimodal facilities.
- **Health and Climate Vulnerability:** Target more intense development in areas with low health and climate vulnerability.

Staff then refined the Preferred Alternative based on direction from City Council and the Planning Commission. The Preferred Alternative was endorsed via resolution by City Council on December 15, 2025. It will be included for adoption with the updated Comprehensive Plan and Zoning Code later in May and June 2026.

The Final EIS analyzes the potential impacts of the Preferred Alternative, relative to Alternative 1, Alternative 2, and a No Action Alternative, on the built environment (Chapter 3) and natural environment (Chapter 4).

Common Response #2: General Quality of Life Concerns

The City received comments with concerns about the potential effects of planned growth on quality of life in Vancouver.

Regardless of which alternative is selected, the pace and distribution of future growth in Vancouver would be influenced in part by the implementation of the Comprehensive Plan policies, related regulations and actions, and by decisions made by individual property owners and developers.

Growth is not expected to be uniform citywide. More intense development is focused in specific areas like urban centers and corridors. The proposed Comprehensive Plan update

intends to guide growth that aligns with community values, state laws, and long-term City and community goals like climate action, opportunity for all, and community safety. The plan update supports incremental, community-guided change, balancing continuity with the evolving needs of current and future generations.

The proposed Comprehensive Plan update discusses quality of life in more detail and includes goals and policies to support quality of life for the Vancouver community, particularly in the plan's vision statement, Community Experience chapter, Climate and Environment chapter, and Parks and Recreation chapter. The Our Vancouver Health Impact Assessment (HIA) considers how the alternatives studied as part of the Our Vancouver Comprehensive Plan periodic update may benefit and impact health in Vancouver as it relates to the built environment. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan, the HIA, and other related documents.

Common Response #3: Car Dealerships

The City received comments with concerns about car dealerships within the City, particularly when they replace other neighborhood-serving uses.

The recent motor vehicle sales development at Mill Plain Boulevard and SE 136th Avenue (Lexus dealership) is part of an approved master plan and was found to meet all zoning and environmental requirements of the existing Mixed Use zoning district in the existing zoning code. Opportunities for public input for this project occurred in October and November 2024. This development and all other developments submitted under the existing zoning code must follow the development standards in place at the time of submittal. These developments may opt into the proposed updated zoning code once adopted and if their intended use is still allowed.

The Preferred Alternative designates the property at the northeast corner of Mill Plain Boulevard and SE 136th Avenue as Mixed-Use Neighborhood zoning. This proposed new zoning district allows both commercial and residential uses, including Motor Vehicle Sales/Rental as a conditional use. In the proposed updated zoning code, future Motor Vehicle Sales/Rental uses will be required to locate vehicle parking, display, and storage behind the building to support pedestrian-oriented design. The proposed new code includes greater limits on where Motor Vehicle Sales/Rental uses can locate. They are now allowed only as a conditional use in the Mixed-Use Neighborhood district and as an allowed use in the Industrial/Employment district.

While the zoning code determines what types and sizes of developments are *allowed* in different locations across the city, property owners decide if and when changes occur.

Property owner decisions are influenced by policies, market forces, and personal preferences and choices.

To view this and other recent development projects, visit the City's development dashboard.

Common Response #4: Vehicle Traffic Impacts

The City received comments with concerns about potential impacts on traffic related to the action alternatives.

As noted in the Final EIS, all of the alternatives, including the No Action Alternative, would increase vehicle miles traveled (VMT) to some degree in 2045 as compared to existing conditions because of expected growth and development. However, VMT per household is projected to be slightly lower under the Preferred Alternative than the No Action Alternative, likely because they propose more areas with a mix of residential and commercial land uses, which can reduce the length and frequency of vehicle trips and make different trip types more likely.

The Transportation section of Final EIS Chapter 3 addresses potential impacts of the alternatives on traffic and transportation, as well as proposed mitigation measures to offset potential impacts.

Reducing vehicle travel lanes can improve overall safety by lowering vehicle speeds and reducing the frequency and severity of crashes. Reallocating roadway space also supports walking, biking, and transit, which helps decrease vehicle miles traveled and associated greenhouse gas emissions. These changes contribute to cleaner air, safer streets, and a more accessible transportation network for all users. While some arterial street widening is planned, they are costly and limited in scope, making it essential to use existing roadway space more efficiently to move more people in more ways.

Common Response #5: Traffic Safety

The City received comments with concerns about potential impacts on traffic safety related to the action alternatives.

The Transportation section of Final EIS Chapter 3 addresses potential impacts of the alternatives, including the potential for increases in collisions, as well as proposed mitigation measures to offset potential impacts. The Preferred Alternative would have higher daily traffic volumes compared to the No Action Alternative for most safety corridors identified in the City of Vancouver's Local Road Safety Plan, 2022–2026. At most safety corridor locations, the Preferred Alternative would have similar or lower traffic volumes than

Alternatives 1 and 2, which reflects that new housing capacity would be spread more evenly throughout all areas of the city.

An increase in volume does not necessarily indicate an increase in fatal or severe crashes. However, increases in traffic volumes can increase the number of overall crashes due to greater volumes of vehicles on the road and increased exposure to vehicles by all roadway users. To address traffic safety, the Comprehensive Plan includes implementation steps related to updating street standards to create safer, and more comfortable multimodal streets and connectivity standards to improve pedestrian and small mobility access. The City is implementing a citywide low-stress bicycle and small mobility network that prioritizes safety and comfort for people of all ages and abilities regardless of mode of travel and land use patterns that reduce vehicle miles traveled, traffic congestion, and greenhouse gas emissions, and improve safety and air quality.

The Comprehensive Plan Transportation and Mobility chapter and the Transportation System Plan include goals and policies to improve traffic safety. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan.

Common Response #6: Vehicle Parking

The City received comments with concerns about potential impacts on parking related to the action alternatives.

The Transportation section of Final EIS Chapter 3 discusses existing parking demand, as well as proposed mitigation measures to offset potential impacts in areas with more intense proposed land uses, such as expanding allowances for shared parking facilities and implementing strategic pricing mechanisms to regulate the availability of on-street parking in Mixed-Use and Regional Activity Centers.

The City currently requires property owners to build a minimum number of parking spaces, typically based on use and building size. The Comprehensive Plan Update proposes to eliminate most minimum parking requirements, allowing property owners to decide how much parking to build based on their needs. This can help reduce excessive, underused parking and large paved areas that create heat islands, reduce the cost of building housing, and increase space for housing, trees, and green space. This shift aligns with state law (2025 S.B. 5184), which requires reduced parking mandates for some uses, including housing, commercial spaces, and childcare.

This change does not prohibit parking. Owners can still build as much on-site parking as they choose in most places. Parking that is built will still need to meet development standards,

including size and access requirements and new requirements for parking to generally be located behind a building. On-street parking will continue to be a public amenity for public use and not owned by adjacent property owners.

For issues concerning parking enforcement, please visit the Neighborhood Parking and Traffic page on the City's website.

Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan and code updates that address parking minimums.

Common Response #7: Sidewalks

The City received comments with concerns about pedestrian infrastructure, including incomplete sidewalk facilities in some areas of the City.

The Comprehensive Plan Transportation and Mobility chapter as well as the Transportation System Plan (TSP) include policies to address sidewalk gaps. The TSP includes 148 miles of proposed sidewalk infill. Many of these infill projects are associated with other roadway projects happening adjacent to the sidewalk.

Because public funding alone cannot cover the enormous cost of filling existing gaps, most of the City's sidewalk network is built out by private development. As part of the review and permitting process, development is typically required to build frontage including sidewalks and pay fees that help fund broader infrastructure needs. While the City pursues grants such as Safe Routes to School, these sources address only a small portion of the overall need. Ongoing and future development helps build sidewalks and reduce sidewalk deficiencies.

Refer to the Comprehensive Plan webpage on the City's website for more details about the proposed Comprehensive Plan.

Common Response #8: Housing Affordability/Options

The City received comments with concerns about housing affordability and options.

The Housing section of Final EIS Chapter 3 discusses potential effects on housing, including the level of supply, diversity, and potential cost, as well as proposed measures to help avoid, minimize, and mitigate potential housing impacts. The Comprehensive Plan Housing chapter includes in-depth analysis of housing affordability and goals and policies to address affordability and building different types of housing to meet the needs of Vancouver residents. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan.

The Preferred Alternative would result in a greater diversity of housing types than the No Action Alternative. The Preferred Alternative designates more land for higher-intensity middle housing and multifamily development types through the application of Medium-Scale Neighborhood, Mixed-Use Neighborhood, and Regional Activity Center zoning districts. These denser zoning districts allow for a broader range of housing types with more and smaller units, and more potential for lower cost units.

The proposed new zoning code standards in the Preferred Alternative are intended to be easier and simpler to understand, which may also reduce the costs and barriers to housing production. New state laws (2023 H.B. 1110) require the City of Vancouver to allow for at least four dwelling units per lot on all lots in single-family zones, and up to six dwelling units per lot if within a quarter mile of a major transit stop, or if two of the units are affordable. The Preferred Alternative goes beyond the minimum requirements established by H.B. 1110 in order to meet City and community goals, housing targets, and other state laws, including 2021 H.B. 1220, which requires the City to accommodate set numbers of housing needs at all income levels. Lands designated Low-Scale Neighborhood have the potential for a greater diversity of housing types, such as duplexes, quadplexes, sixplexes, and townhomes than current low-density zoning districts.

The higher capacity for new housing units allows for greater opportunities to construct different smaller housing types, which in turn have the potential to be more affordable for a broader range of household income levels. However, certain household income ranges will likely not be served by the private market without additional public subsidy for affordable housing.

Common Response #9: Homeownership Opportunities

The City received comments with concerns about homeownership opportunities.

The Housing section of Final EIS Chapter 3 discusses potential effects on housing, as well as proposed measures to help avoid, minimize, and mitigate potential housing impacts and promote homeownership opportunities.

Currently, homeownership in Vancouver is primarily available through detached single family homes but can be possible through a range of types and sizes of housing. The Preferred Alternative allows for more housing and a wider variety of housing types, which can help improve the availability of housing, housing affordability, and homeownership opportunities. Middle housing types in particular open more options for attached and detached fee simple homeownership opportunities, and state level condominium reform can contribute to greater feasibility of multifamily homeownership. Increased housing production that lowers the cost

of rental housing can indirectly improve homeownership opportunities, by allowing renters to save more money towards a future home down payment.

The proposed Comprehensive Plan Housing chapter includes goal H-5 Access to Homeownership and supporting policies to make homeownership attainable for people across the income spectrum, including communities previously excluded from buying a home through racial covenants and discriminatory lending practices. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan.

Common Response #10: Businesses in Residential Zones

The City received comments with both support for and concerns about allowing businesses in residential zones.

The Preferred Alternative allows a greater mix of uses and increased housing density throughout the City than the No Action Alternative or today's conditions. Chapter 2: Alternatives of the Final EIS and Common Response #1 provide more details about the Preferred Alternative.

The Land and Shoreline Use and Housing sections in Chapter 3 of the Final EIS analyze the impacts of these zoning and land use changes, including compatibility with existing land uses and opportunities to locate housing within a 15-minute walk of shopping, entertainment, cultural amenities, education, and employment.

While allowing a greater mix of uses can improve access to services and support housing needs, the plan also recognizes that not all areas are appropriate for mixing uses due to potential conflicts with industrial activities or residential livability. The Preferred Alternative focuses higher-density and mixed-use development in designated centers and corridors, while maintaining flexibility in other neighborhoods to balance growth and change.

Common Response #11: Property Value and Taxes

The City received comments with concerns about property values and taxes.

This topic is generally outside the scope of the EIS analysis. The proposed Comprehensive Plan and zoning code generally increases flexibility of the type and density of uses allowed, which generally increases property values over time. However, the Comprehensive Plan is not designed to control property values. It guides growth to meet long-term community needs. Property values may change for many reasons, but the plan does not speculate on the real estate market.

In Washington state, an individual's property taxes are calculated based on the budgets prepared by the jurisdictions that provide the property users with infrastructure and services. These budgets are prepared independently from property values and are typically limited to a 1% increase from one year to the next. This limit does not apply to taxes from voter-approved bonds and special levies. A property's assessed value determines the *share of these budgets* that an individual property is taxed, rather than a specific percentage of the assessed value itself.

Washington has two property tax relief programs for senior citizens and people with disabilities: a Property Tax Deferral program and a Property Tax Exemption program.

Common Response #12: Neighborhood Character

The City received comments with concerns about changes to neighborhood character resulting from the action alternatives.

The Final EIS considers the potential impacts of the alternatives on compatibility with existing land uses, as well as aesthetics and historic and cultural preservation, in the Land and Shoreline Use, Aesthetics, and Historic and Cultural Preservation sections in Chapter 3. These sections also outline proposed measures to help avoid, minimize, and mitigate these impacts, including existing laws related to shadows, light and glare and historic preservation, development standards in the zoning code update such as transitions between zoning districts, and Comprehensive Plan goals and policies.

The EIS recognizes the potential for greater incompatibility between land uses with the Preferred Alternative as compared to the No Action Alternative, as it would accommodate more intense building types and growth, and a greater mix of residential and commercial uses, in more areas of the city. The EIS also acknowledges potential impacts to aesthetics, including compatibility with urban form and character, resulting from allowances for taller buildings and new sources of shadows, light and glare. There would also be potential aesthetic improvements associated with the redevelopment of parking lots and vacant lots and structures and infrastructure improvements required of new development.

Refer to Common Responses #1 and #2 for more information about how the potential impacts of the alternatives will occur over time and will be driven by property owner decisions.

The proposed Comprehensive Plan Community Experience chapter includes goal CE-5 Community Pride and Identity and supporting policies to support a strong community

identity. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan.

Common Response #13: Village at Fisher's Landing Neighborhood

The City received a high volume of comments from Village at Fisher's Landing Neighborhood residents with concerns about the proposed action alternatives' potential impacts related to noise and the existing sound wall, vehicle traffic, safety, plants and wildlife, quality of life, sidewalk gaps, businesses in residential areas, property values, neighborhood change, CC&Rs, and compatibility.

Since the Draft EIS, the City has developed a Preferred Alternative that combines elements of Alternatives 1 and 2 for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative would designate the Village at Fisher's Landing as a mix of Medium-Scale Neighborhood and Low-Scale Neighborhood zoning. The Preferred Alternative directs higher-density growth to corridors, such as along 164th Avenue, and in areas with good access to transit and commercial services, such as The Village at Fisher's Landing. Additionally, Manufactured Home Park zoning was applied to the existing manufactured home park development to help preserve this affordable housing type.

The Preferred Alternative emphasizes directing higher-density growth to corridors and centers, such as the Fisher's Landing Transit Center along SE 164th Avenue, where existing infrastructure and services can help support it. This approach is consistent with community input to focus density in those areas rather than established neighborhoods.

Refer to Common Response #1, Preferred Alternative, for more information about how the Preferred Alternative was created, the need to consider alternatives for the plan, map, and code, and how the potential impacts of the alternatives will occur over time.

The Noise section of Final EIS Chapter 3 provides more information about the high-level noise analysis for the alternatives. No substantial increases in noise are expected to occur under the alternatives; therefore, no additional mitigation measures are proposed. All environmental noise would continue to be regulated by WAC 173-60 and VMC 20.935. The updated Comprehensive Plan includes goals and policies to address noise pollution. Refer to the Comprehensive Plan webpage on the City's website for more details about the proposed Comprehensive Plan.

The Preferred Alternative, proposed Comprehensive Plan, and zoning code do not propose the removal of the sound wall along 164th Avenue. In areas where development is planned near existing or future sources of higher noise levels, the City may consider whether to require implementation of noise reduction methods such as locating noise-sensitive areas further from noise sources, including walls or other barriers to shield noise from noise-sensitive use locations; and designing interior spaces with noise-reducing building materials.

Refer to Common Response #2 for more information about general quality of life concerns.

Vehicle traffic concerns are addressed in the Transportation section in Chapter 3 of the Final EIS, which identifies multimodal improvements and traffic calming to reduce potential impacts. Refer to Common Responses #4 and #5 for more information about traffic impacts and traffic safety.

Refer to Common Response #11 for more information about property values and taxes. The Historic and Cultural Preservation section of Final EIS Chapter 3 acknowledges the potential for disturbance of individual sites and associated impacts to historic resources and provides mitigation measures designed to offset these impacts. The Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 considers the potential impacts of the alternatives on air pollution and indicates that there would be lower modeled air pollutant emissions than existing conditions under all of the alternatives under consideration.

Regarding any Covenants, Conditions, and Restrictions (CC&Rs) in the Village at Fisher's Landing neighborhood, CC&Rs are private contractual agreements among property owners. Preexisting CC&Rs established before new state housing laws (2023 H.B. 1110) remain valid and enforceable by the private parties involved, but the City does not evaluate or enforce CC&Rs as part of land use regulation or permitting. Enforcement or modification of CC&Rs remains the responsibility of property owners and their associations.

Refer to the Plants and Animals section of Final EIS Chapter 4 for more information on the potential impacts to plants and wildlife, as well as proposed measures to address those impacts. Mitigation strategies identified in the Final EIS include landscaping requirements and tree replacement policies to reduce impacts on wildlife habitat.

Refer to Common Response #12 for more information about neighborhood character.

Refer to Common Response #7 for more information about sidewalks.

Refer to Common Response #10 for more information about businesses in residential areas.

Common Response #14: Southcliff Neighborhood

The City received a high volume of comments from Southcliff neighborhood residents with concerns about the proposed action alternatives' potential impacts related to quality of life, noise, vehicle traffic and parking, safety, tree canopy, plants and wildlife, sidewalk gaps, property values, and neighborhood change, CC&Rs, and compatibility.

Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative would zone the Southcliff neighborhood as a mix of Low-Scale Neighborhood and Medium-Scale Neighborhood.

Refer to Common Response #1, Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS, the need to consider alternatives for the plan, map, and code, and how the potential impacts of the alternatives will occur over time.

The Preferred Alternative emphasizes directing higher-density growth to corridors and centers, such as the Heights District, where existing infrastructure and services can help support it. This approach is consistent with suggestions to focus density in those areas rather than established neighborhoods. Even with the additional housing provided by the Heights District development, additional housing is still needed to meet the needs of current and future residents over the next 20 years. Refer to the Land and Shoreline Use section and the Housing section in Chapter 3 of the Final EIS for more information about the potential for the different alternatives to meet housing targets and needs.

Refer to Common Response #2 for more information on general quality of life concerns.

Regarding any Covenants, Conditions, and Restrictions (CC&Rs) in the Southcliff Neighborhood, CC&Rs are private contractual agreements among property owners. Preexisting CC&Rs established before new state housing laws (2023 H.B. 1110) remain valid and enforceable by the private parties involved, but the City does not evaluate or enforce CC&Rs as part of land use regulation or permitting. Enforcement or modification of CC&Rs remains the responsibility of property owners and their associations.

Neighborhood Action Plans are community-driven documents that identify local issues and improvements specific to an individual or group of neighborhoods at a point in time. They are not binding documents and do not represent official City policy, but they can and often do inform City investments in neighborhoods related to items such as traffic calming, street improvements and investments in parks and open spaces. They provide one source of input

among many into City planning and investment decisions. Like other planning documents, their goals and recommendations need to be revisited and updated from time to time to reflect changing circumstances and new regulations.

Vehicle traffic concerns are addressed in the Transportation section in Chapter 3 of the Final EIS, which notes higher projected traffic volumes along corridors such as Mill Plain Boulevard and identifies multimodal improvements, traffic calming, and parking management tools to reduce neighborhood impacts. Refer to Common Responses #4 and #5 for more information about vehicle traffic impacts and safety and to Common Response #6 about vehicle parking.

No properties in the Southcliff neighborhood were identified as listed on federal or county historic registers during the EIS development process. The Historic and Cultural Preservation section of Final EIS Chapter 3 provides a map and list of historic sites and districts, as well as an analysis of potential impacts to historic resources, and mitigation measures designed to offset these impacts. All future development projects will be required to comply with City and state requirements for identification and preservation of cultural, archaeological, and historic resources.

Refer to Common Response #12 for more information about neighborhood character.

The Noise section of Final EIS Chapter 3 provides more information about the high-level noise analysis for the alternatives. No substantial increases in noise are expected to occur under the alternatives; therefore, no additional mitigation measures are proposed. All environmental noise would continue to be regulated by WAC 173-60 and VMC 20.935. The updated Comprehensive Plan includes goals and policies to address noise pollution. Refer to the Comprehensive Plan webpage on the City's website for more details about the proposed Comprehensive Plan.

Refer to the Plants and Animals section of Final EIS Chapter 4 for more information on the potential impacts to tree canopy, plants and wildlife, as well as proposed measures to address those impacts. Mitigation strategies identified in the Final EIS include landscaping requirements and tree replacement policies to reduce impacts on wildlife habitat. Refer to the Water section of the Final EIS Chapter 4 for more information on the potential impacts to stormwater runoff and proposed mitigation measures.

Refer to Common Response #11 for more information about property value and taxes.

Common Response #15: Homelessness

The City received comments with concerns about homelessness and related issues. The Comprehensive Plan Housing chapter includes goal H-3 Reduce Homelessness, and three supporting policies that aim to provide adequate transitional, permanently supportive, and affordable housing in the community, so that all residents have access to safe and stable housing. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan.

The Preferred Alternative provides for a greater range of housing opportunities than the No Action Alternative, including different types and sizes of housing that can be more affordable, lessening pressures on homelessness over time. Refer to Common Response #8, Housing Affordability/Options.

Along with housing initiatives, the City is addressing homelessness in Vancouver in several ways, including:

- Development of four Safe Stay communities and one Homeward Bound Safe Park site that are managed by the City and its contractors.
- A 120-bed Bridge Shelter that will provide people a safe place to stay while they work to find permanent housing, expected to be completed in fall 2026.
- The City's 9-person Homeless Assistance and Resource Team (HART) provides outreach and assistance to people experiencing unsheltered homelessness and addresses community impacts of unsheltered homelessness.
- Funding the Talkin' Trash program in partnership with local non-profit organization Share that picks up 20 tons of trash monthly.
- Funding an emergency rental assistance program that helps reduce evictions.
- Funding additional rent-restricted affordable housing through the use of the City's voter-approved Affordable Housing Fund and federal pass-through dollars, including permanently affordable housing with services on site and facilities specifically designed for people exiting homelessness.

Chapter 7~~6~~: References

Note to readers: This Final Environmental Impact Statement document retains and builds upon the information presented in the Draft Environmental Impact Statement. New content in this chapter is generally denoted with underlined text, while changes to information are denoted with strikethrough text.

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Appendix A: Scoping Information

OUR VANCOUVER Comprehensive Plan Update

Washington State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement

The City of Vancouver invites you to comment on the environmental topics that will be analyzed as part of its Comprehensive Plan update.

Date of Issuance: July 12, 2024
Deadline for Comments: August 12, 2024 (no later than 11:59 p.m. Pacific time)
Lead Agency: City of Vancouver

Description of Proposal: City of Vancouver Comprehensive Plan Update

The City of Vancouver is updating its Comprehensive Plan, which will establish a vision that guides the City's growth and development for the next 20 years, from 2025 to 2045. Since the plan was last updated in 2011, Vancouver has experienced substantial growth, as well as demographic, economic and social changes.

To meet the requirements of the Washington State Growth Management Act, the City is currently conducting a full rewrite of the existing Comprehensive Plan. As part of this process, the City is developing a detailed strategy for implementing the goals, policies, and strategies outlined with the revised plan, and modifying the existing zoning code (Title 20 of the Vancouver Municipal Code [VMC]), which regulates the scale, size and location of buildings and uses, to reflect the goals and policies identified in the revised plan.

The City is engaging in extensive community outreach and engagement to help planners address key questions about housing; land use, development and infrastructure; economic development; equity and opportunity; and climate and environment. The proposed update to the City's Comprehensive Plan will plan for growth of approximately 38,000 new housing units and 43,000 new jobs by the year 2045. These growth targets are based on population projections from the Washington State Office of Financial Management, recent trends, state law, and City policy to plan for long term housing and employment needs.

The Comprehensive Plan Update must be adopted by December 31, 2025.

Proponent: City of Vancouver
Location of Proposal: Vancouver, Washington (citywide)

Environmental Impact Statement (EIS) Required:
The City of Vancouver has determined that this proposal is likely to have a significant adverse impact on the environment. This means the proposal has a reasonable likelihood of negative effects on environmental quality that could be considered more than moderate. An EIS is required under state law [Revised Code of Washington RCW 43.21C.030 (2)(c)] and will be prepared, including proposed mitigation measures. Mitigation measures are changes or conditions to a proposal that are intended to avoid, minimize, or compensate for potential adverse impacts.

OUR VANCOUVER Comprehensive Plan Update

The EIS is a document that will provide information for the public, agencies, and tribal governments to consider during the decision-making process for the Comprehensive Plan Update. The EIS will describe potential alternatives, existing environmental conditions, potential significant environmental impacts, and potential measures to mitigate impacts.

The City currently plans to review a scenario of future conditions if no changes to the current Comprehensive Plan and associated plans and regulations are made, called a No Action Alternative, and up to three Action Alternatives that outline different land use and growth scenarios in specific areas of the city.

The City has identified the following elements of the built and natural environment for discussion in the EIS in accordance with Washington Administrative Code (WAC) 197-11-444:

- Land and shoreline use
- Housing
- Aesthetics (including light and glare)
- Historic and cultural resources
- Transportation
- Noise
- Public services and utilities (including emergency services, water, sewer, schools, parks and recreation)
- Earth (geologic hazard areas, soils, topography)
- Air quality, greenhouse gases, and climate
- Water resources
- Plants and animals

Request for Comments:
Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Licenses and approvals may include potential required permits from state, local, and federal agencies.

Scoping comments may be provided via email or postal mail to the following addresses:

Email: OurVancouver2045@cityofvancouver.us
Postal Mail:
Attn: Julie Nischik
City Hall
PO Box 1995
Vancouver, WA 98668

OUR VANCOUVER Comprehensive Plan Update

You may also learn more about the project, scoping process and provide written comments by visiting an Our Vancouver table at an upcoming outreach event. Events will be posted on the project webpage as they are scheduled.

The deadline for scoping comments is August 12, 2024, at 11:59 p.m.

For More Information:

Please visit the city's Comprehensive Plan website for more information about the ongoing process of plan development and the schedule for upcoming outreach events:

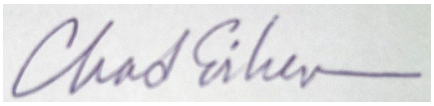
https://www.beheardvancouver.org/plan2045

Agency Contact Information:

Julie Nischik
Senior Support Specialist, Community Development, City of Vancouver
OurVancouver2045@cityofvancouver.us
(360) 487-7813

SEPA Responsible Official:
Chad Eiken, AICP
Director, Community Development, City of Vancouver
chad.eiken@cityofvancouver.us
(360) 487-7882

Date: July 12, 2024

Signature: 

OUR VANCOUVER Comprehensive Plan Update

Washington State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement (Comment Period Extension)

The City of Vancouver invites you to comment on the environmental topics that will be analyzed as part of its Comprehensive Plan update. **The deadline for comments has been extended to August 23, 2024.**

Date of Issuance: July 12, 2024 (*revised on August 9, 2024, to extend comment period*)
Deadline for Comments: August 23, 2024 (no later than 11:59 p.m. Pacific time)
Lead Agency: City of Vancouver

Description of Proposal: City of Vancouver Comprehensive Plan Update

The City of Vancouver is updating its Comprehensive Plan, which will establish a vision that guides the City's growth and development for the next 20 years, from 2025 to 2045. Since the plan was last updated in 2011, Vancouver has experienced substantial growth, as well as demographic, economic and social changes.

To meet the requirements of the Washington State Growth Management Act, the City is currently conducting a full rewrite of the existing Comprehensive Plan. As part of this process, the City is developing a detailed strategy for implementing the goals, policies, and strategies outlined with the revised plan, and modifying the existing zoning code (Title 20 of the Vancouver Municipal Code [VMC]), which regulates the scale, size and location of buildings and uses, to reflect the goals and policies identified in the revised plan.

The City is engaging in extensive community outreach and engagement to help planners address key questions about housing; land use, development and infrastructure; economic development; equity and opportunity; and climate and environment. The proposed update to the City's Comprehensive Plan will plan for growth of approximately 38,000 new housing units and 43,1000 new jobs by the year 2045. These growth targets are based on population projections from the Washington State Office of Financial Management, recent trends, state law, and City policy to plan for long term housing and employment needs.

The Comprehensive Plan Update must be adopted by December 31, 2025.

Proponent: City of Vancouver
Location of Proposal: Vancouver, Washington (citywide)

Environmental Impact Statement (EIS) Required:
The City of Vancouver has determined that this proposal is likely to have a significant

adverse impact on the environment. This means the proposal has a reasonable likelihood of negative effects on environmental quality that could be considered more than moderate. An EIS is required under state law [Revised Code of Washington RCW 43.21C.030 (2)(c)] and will be prepared, including proposed mitigation measures. Mitigation measures are changes or conditions to a proposal that are intended to avoid, minimize, or compensate for potential adverse impacts.

The EIS is a document that will provide information for the public, agencies, and tribal governments to consider during the decision-making process for the Comprehensive Plan Update. The EIS will describe potential alternatives, existing environmental conditions, potential significant environmental impacts, and potential measures to mitigate impacts.

The City currently plans to review a scenario of future conditions if no changes to the current Comprehensive Plan and associated plans and regulations are made, called a No Action Alternative, and up to three Action Alternatives that outline different land use and growth scenarios in specific areas of the city.

The City has identified the following elements of the built and natural environment for discussion in the EIS in accordance with Washington Administrative Code (WAC) 197-11-444:

- Land and shoreline use
- Housing
- Aesthetics (including light and glare)
- Historic and cultural resources
- Transportation
- Noise
- Public services and utilities (including emergency services, water, sewer, schools, parks and recreation)
- Earth (geologic hazard areas, soils, topography)
- Air quality, greenhouse gases, and climate
- Water resources
- Plants and animals

Request for Comments:
Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Licenses and approvals may include potential required permits from state, local, and federal agencies.

Scoping comments may be provided via email or postal mail to the following addresses:
Email: OurVancouver2045@cityofvancouver.us

Postal Mail:
Attn: Julie Nischik
City Hall
PO Box 1995
Vancouver, WA 98668

You may also learn more about the project, scoping process and provide written comments by visiting an Our Vancouver table at an upcoming outreach event. Events will be posted on the project webpage as they are scheduled.

The deadline for scoping comments is August 23, 2024, at 11:59 p.m. *(Note: The comment deadline was previously August 12, 2024, but has been extended to allow more opportunities for agencies, tribes, and community members to submit their comments.)*

For More Information:
Please visit the city's Comprehensive Plan website for more information about the ongoing process of plan development and the schedule for upcoming outreach events:

https://www.beheardvancouver.org/plan2045

Agency Contact Information:
Julie Nischik
Senior Support Specialist, Community Development, City of Vancouver
OurVancouver2045@cityofvancouver.us
(360) 487-7813

SEPA Responsible Official:
Chad Eiken, AICP
Director, Community Development, City of Vancouver
chad.eiken@cityofvancouver.us
(360) 487-7882

Date: July 12, 2024 (*revised on August 9, 2024*)

Signature:



Revised Washington State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement

The City of Vancouver invites you to comment on the environmental topics that will be analyzed as part of its Comprehensive Plan update. The City is issuing this revised notice to clarify proposed future growth levels, the number of alternatives that will be analyzed in the Draft EIS, and the role of desired community outcomes and goals in the Comprehensive Plan update and SEPA process. ***All comments received during the previous scoping period (July–September 2024) remain valid and will be considered as part of the SEPA review process.***

Date of Issuance: October 22, 2024
Deadline for Comments: November 21, 2024 (no later than 11:59 p.m. Pacific time)
Lead Agency: City of Vancouver
Description of Proposal: City of Vancouver Comprehensive Plan Update

The City of Vancouver is updating its Comprehensive Plan, which will establish a vision that guides the City's growth and development for the next 20 years, from 2025 to 2045. Since the plan was last updated in 2011, Vancouver has experienced substantial growth, as well as demographic, economic and social changes.

To meet the requirements of the Washington State Growth Management Act, the City is currently conducting a full rewrite of the existing Comprehensive Plan. As part of this process, the City is developing a detailed strategy for implementing the goals, policies, and strategies outlined with the revised plan, and modifying the existing zoning code (Title 20 of the Vancouver Municipal Code [VMC]), which regulates the scale, size and location of buildings and uses, to reflect the goals and policies identified in the revised plan.

The City is engaging in extensive community outreach and engagement to help planners address key questions about housing; land use, development and infrastructure; economic development; equity and opportunity; and climate and environment. The proposed update to the City's Comprehensive Plan will plan for growth of at least 38,000 new housing units and 43,100 new jobs by the year 2045. These growth targets are the minimum necessary to plan for long-term housing and employment needs based on population projections from the Washington State Office of Financial Management, recent trends, state law, and City policy. The Comprehensive Plan Update must be adopted by December 31, 2025.

Proponent: City of Vancouver
Location of Proposal: Vancouver, Washington (citywide)

Environmental Impact Statement (EIS) Required:
The City of Vancouver has determined that this proposal is likely to have a significant adverse impact on the environment. This means the proposal has a reasonable likelihood of negative effects on environmental quality that could be considered more than moderate. An EIS is required under state law [Revised Code of Washington RCW 43.21C.030 (2)(c)] and will be prepared, including proposed mitigation measures. Mitigation measures are changes or conditions to a proposal that are intended to avoid, minimize, or compensate for potential adverse impacts.

The EIS is a document that will provide information for the public, agencies, and tribal governments to consider during the decision-making process for the Comprehensive Plan Update. The EIS will describe potential alternatives, existing environmental conditions, potential significant environmental impacts, and potential measures to mitigate impacts.

The City currently plans to review a scenario of future conditions if no changes to the current Comprehensive Plan and associated plans and regulations are made, called a No Action Alternative, and up to two Action Alternatives that outline different land use and growth scenarios in specific areas of the city. The City intends for the land use and growth scenarios analyzed in the Action Alternatives to align with the Goals Framework developed with community partners for the Comprehensive Plan Update. The Goals Framework identifies numerous desired community outcomes, including connected and accessible neighborhoods; affordable, accessible housing choices; equity and inclusion; economic opportunity; and climate adaptability, sustainability, and resiliency.

The City has identified the following elements of the built and natural environment for discussion in the EIS in accordance with Washington Administrative Code (WAC) 197-11-444:

- Land and shoreline use
- Housing
- Aesthetics (including light and glare)
- Historic and cultural resources
- Transportation
- Noise
- Public services and utilities (including emergency services, water, sewer, schools, parks and recreation)
- Earth (geologic hazard areas, soils, topography)
- Air quality, greenhouse gases, and climate
- Water resources
- Plants and animals

Request for Comments:
Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Licenses and approvals may include potential required permits from state, local, and federal agencies.

Scoping comments may be provided via email or postal mail to the following addresses:
Email: OurVancouver2045@cityofvancouver.us
Postal Mail:
Attn: Meredith Herbst
City Hall
PO Box 1995
Vancouver, WA 98668

The deadline for scoping comments is November 21, 2024, at 11:59 p.m. ***Note: If you submitted a comment during the previous scoping period (July–September 2024) your comment remains valid and will be considered as part of the SEPA review process.***

For More Information:
Please visit the city's Comprehensive Plan website for more information about the ongoing process of plan development and the schedule for upcoming outreach events:
https://www.beheardvancouver.org/plan2045

Agency Contact Information:
Meredith Herbst
Associate Planner, Community Development, City of Vancouver
OurVancouver2045@cityofvancouver.us
(360) 487-7937

SEPA Responsible Official:
Chad Eiken, AICP
Director, Community Development, City of Vancouver
chad.eiken@cityofvancouver.us
(360) 487-7882

Date: October 22, 2024

Signature:



Memorandum

To: City of Vancouver

From: WSP USA

Subject: State Environmental Policy Act Environmental Impact Statement Scoping Comment Summary and Final Scoping Determination

Date: December 5, 2024

The purpose of this memorandum is to summarize comments received during the State Environmental Policy Act (SEPA) scoping period for the **OUR VANCOUVER** Comprehensive Plan Update Draft Environmental Impact Statement (EIS), and to recommend next steps for the Draft EIS analysis.

Based on the comments received, the range of environmental elements identified in the scoping notice remains appropriate, and the Draft EIS analysis should proceed without modifications to its scope.

Scoping Comment Period Overview

The City of Vancouver (City) issued a SEPA Determination of Significance and request for comments on the scope of the EIS on July 12, 2024. The City published this notice in the SEPA Register, *The Columbian*, and the Be Heard Vancouver website for the Comprehensive Plan Update. The City also provided the notice via an email distribution list consisting of federal, state, and local agencies; tribes; local business organizations; local builders and real estate development professionals; neighborhood associations; environmental organizations; media outlets; and other interested parties. The scoping notice was also distributed to the **OUR VANCOUVER** project listserv that includes more than 200 individual contacts.

The scoping notice initially requested comments during an expanded 30-day period, which is greater than the 21-day minimum required by SEPA. The comment period was originally scheduled to end on August 12, 2024. In order to provide additional opportunities for review and comment by local agencies and communities, the City extended the scoping comment period to August 23, 2024, and again to September 6, 2024. The scoping notice requested comments via postal mail or email.

The City issued a revised scoping notice on October 22, 2024, to clarify proposed future growth levels, the number of alternatives that will be analyzed in the Draft EIS, and the role of desired community outcomes and goals in the Comprehensive Plan update and SEPA process. This scoping notice, which was distributed via the same methods as the previous notices, invited additional comments via postal mail or email during a 30-day period ending November 21, 2024. The notice stated that comments submitted during the previous comment period remain valid and will be considered as part of the SEPA review process.

EIS Scope Elements

The original scoping notice identified the City's intent to evaluate a No Action Alternative, as required by SEPA, and up to three other alternatives that outline different land use and growth scenarios in specific areas of the City. The revised scoping notice reduced the number of anticipated action alternatives from three to two.

The scoping notice also identified the following elements of the built and natural environment for discussion in the EIS in accordance with Washington Administrative Code (WAC) 197-11-444:

- Land and shoreline use
- Housing
- Aesthetics (including light and glare)
- Historic and cultural resources
- Transportation
- Noise
- Public services and utilities (including emergency services, water, sewer, schools, parks and recreation)
- Earth (geologic hazard areas, soils, topography)
- Air quality, greenhouse gases, and climate
- Water resources
- Plants and animals

Summary of Comments Received

The City received eight total comment submissions via email and no comments via postal mail during the two comment periods. Seven of the comment submissions came from private individuals, and one of the comment submissions came from the Washington Department of Fish and Wildlife.

None of the comments included objections to the environmental elements identified in the scoping notice. Most of the comments provided detailed input or questions about specific

topics of interest, including EIS elements to be studied, analysis methods, and potential mitigation measures. The following list summarizes the main themes of the comments received by topic area.

EIS Methodology

- Interest in how EIS elements will be prioritized and assessed given potential for conflicts between elements.

Land and Shoreline Use

- Maintain low zoning densities around high-value habitat areas to minimize habitat fragmentation and wildlife displacement.
- Limit development within the Vancouver Lake area to preserve habitats.
- Integrate green spaces into urban areas to benefit residents and provide habitat for wildlife.
- Evaluate how expected development will affect the percentage of forest cover and the effective impervious area within Vancouver's watersheds.
- Incorporate open space into high density areas, such as exploring green roofs or shared open space opportunities, particularly for access by low-income households.
- Assess the efficacy of transit-oriented development.

Housing

- Prioritize urban density and housing affordability.
- Consider "single-room occupancy" as an affordable housing strategy.
- Include utility costs over a 15-year horizon when evaluating housing affordability.

Aesthetics, Noise

- Examine strategies to reduce light and noise pollution in developed areas, particularly at night.

Transportation

- Increase interconnectedness of walkways and trails for alternative transportation.

Public Services and Utilities

- Unbundle elements within public services and utilities to discretely discuss individual topics and emphasize their importance (e.g., emergency services, including fire and police services; utilities, including water and sewer services; schools; parks and recreation; and other public services).

- Ensure that emergency services analysis includes discussion of fire and law enforcement services.
- Amend pipeline company franchise agreements to require an end-of-life plan for the pipes, require monitoring and reporting of leaks, and increase charges for easements.
- Require gasoline fueling stations to prevent and be responsible for addressing tank leaks and to carry higher insurance policy values.
- Evaluate rapid build-out of solar energy installations as an alternative to Clark Public Utilities.

Air Quality, Greenhouse Gases, and Climate

- Investigate how Vancouver can meet its future energy needs while minimizing reliance on fossil fuels.
- Require new buildings to be constructed as solar ready and electric ready.
- Require solar and electric power in development agreements.
- Publicize emissions from Clark Public Utilities' operations and look for ways to reduce their emissions.
- Evaluate carbon offsets purchased by the City and the Port of Vancouver.
- Prioritize cooling and disaster centers.

Water

- Evaluate the impact of stormwater facilities in or near critical areas and potential risk of impact to aquatic environments.
- Implement green stormwater infrastructure to reduce runoff and filter pollutants.
- Avoid new impervious surfaces for roads and trails.
- Assess the potential effects on watershed health, including impacts on hydrology, water quality, and fish habitat conditions.

Plants and Animals

- Work toward 28% tree canopy identified in 2011 Comprehensive Plan, particularly in lower income areas of the city.
- Explore opportunities to incorporate native plants and establish pollinator habitats within urban landscaping.
- Require new developments to limit tree removal and work around existing trees.
- Consider wildlife overpasses or underpasses to enhance connectivity between habitats.
- Use Priority Habitats and Species list definitions as the basis for evaluating impacts to fish and wildlife.
- Assess the impact of new roads on habitat connectivity.

- Conserve national resource lands through a transfer of development rights (TDR) program, or other strategy that provides financial incentives for protecting land from development.
- Group relatively undeveloped parcels and farm and forestland to increase habitat value.
- Identify open space areas where large, connected patches of native vegetation can be preserved to maintain biodiversity and provide corridors for wildlife movement.
- Support educational programs and resources for landowners to implement wildlife-friendly practices.
- Prioritize the mitigation sequence of impact avoidance, minimization, and mitigation.
- Identify and prioritize degraded or fragmented critical areas for implementing restoration projects.
- Implement climate-resilient land use strategies, such as preserving wetlands and riparian zones, to help mitigate the effects of extreme weather events and support species adaptation.

Final Scoping Determination

Based on the comments received during the scoping periods, the elements identified in the scoping notice remain valid for analysis in the Draft EIS, and no modifications are needed before proceeding with the analysis.

All of the high-level themes discussed by commenters will be addressed as part of the EIS analysis, including the evaluation of impacts and benefits to housing density and affordability, light and noise pollution, emissions, climate resiliency, tree canopy coverage, green spaces, stormwater runoff, and fish and wildlife habitat areas.

Some comments requested a level of specificity that is outside the scope of the EIS analysis. The City will consider these comments as appropriate in the broader context of developing the draft Comprehensive Plan and associated code amendments.

Appendix B: Market and Land Capacity Analysis Process Memorandum (Updated for Final EIS)

Memorandum

To: Rebecca Kennedy, City of Vancouver (COV)

From: Nicole McDermott, WSP; Sam Rubin, WSP; and Tyler Bump, ECOnorthwest

CC: Bryan Snodgrass, COV; and Chim Chune Ko, COV

Subject: Market and Land Capacity Analysis Methodology and Process for the Preferred Alternative

Date: February 9, 2026

Introduction

This memorandum (memo) outlines the methodology for modeling the estimated housing and employment capacities for the Preferred Alternative studied in the OUR VANCOUVER Comprehensive Plan Update State Environmental Policy Act Final Environmental Impact Statement (FEIS). This methodology memo serves as an addendum to the previously issued methodology memo issued for the Draft Environmental Impact Statement (DEIS), which included analysis of Alternative 1, Alternative 2, and the No Action Alternative. This Preferred Alternative represents the proposed future land use and zoning map for the Comprehensive Plan Update and informs future infrastructure and capital facilities planning required as part of the Comprehensive Plan. This memo follows the same outline as the previous methodology memo but includes additional sections where additional analysis was conducted.

This memo is divided into the following five sections that outline the process for modeling estimated housing and job capacity:

1. Prototype Development and Map Creation: details the creation of the Preferred Alternative.
2. Land Capacity Analysis Deductions (Preferred Alternative): covers the assumptions made for the initial land use capacity analysis and acreage deductions for the Preferred Alternative.
3. Housing Feasibility Analysis: describes the process for modeling the number of new housing units that the Preferred Alternative has the capacity to support.

4. Parcel-Level Modeling of Housing and Job Capacity (Action Alternatives): describes the process of modeling the number of housing units and jobs that the Preferred Alternative has the capacity to support.
5. Model Outputs for Housing and Jobs Capacity: summarizes the housing and jobs capacity numbers used in the FEIS analysis.

1. Prototype Development and Map Creation

The Comprehensive Plan Update proposes to rename and simplify the current land use designations and associated zoning codes to focus on 10 zoning districts:

- Low Scale Neighborhood (LSN)
- Medium Scale Neighborhood (MSN)
- Mixed Use Neighborhood (MU)
- Manufactured Home (MH)
- Regional Activity Center (RAC)
- Institutional/Campus (IC)
- Industrial/Employment (IE)
- Heavy Industrial (HI)
- Parks (POS)
- Natural Areas (NA)

Five of the eight zoning districts (LSN, MSN, MU, RAC, and IC) developed for the Comprehensive Plan Update would allow for a mix of employment and housing types at varying scales and densities. For example, the MSN zoning district would allow housing prototypes with a higher density than single-family housing, but a lower density than podium or tower developments allowed in MU and RAC zoning districts. The Manufactured Home zone is applied to existing mobile home parks in Vancouver and does not permit redevelopment except for in limited cases to comply with HB 1220 and requirements to allow permanent supportive housing and emergency shelters in all zones that allow housing or hotels. The HI, IE, POS, and NA zones do not allow housing development.

Analysts used the steps described below to develop the Preferred Alternative for the FEIS.

Preferred Alternative Development Steps:

1. Develop Prototypes: EcoNorthwest created eighteen housing prototypes that are likely to develop in Vancouver (see Table 1). Prototypes reflect current development trends within the city and the potential for different housing types based on recent

changes in state legislation. The prototypes cover a variety of housing types from single-family homes and four-story walk-ups to towers and podiums. Each prototype has an estimated dwelling-units-per-acre (DUA) value. Prototype allowances were updated for the Preferred Alternative to reflect updated zoning language and density allowances.

2. **Assign Prototypes to Zoning Districts:** Housing prototypes that were identified are those most likely to occur in the different zoning districts that will allow housing (LSN, MSN, MU, RAC, and IC). See Table 1**Error! Reference source not found.**.

   Note: No housing prototypes were identified in IE, HI, MH, POS, or NA because no housing will be allowed.

3. **Prepare Preferred Land Use Alternative:** Finalized Preferred Alternative Map that shows zoning districts throughout the city. This step was developed over many iterations and was prepared with multiple rounds of review with community partners, city staff, the planning commission, and city council.

   Refinement of the alternatives was informed by comments on the DEIS, extensive public input, best planning practices, existing city council policy guidance, existing and planned enhanced transit corridors, locations of parks/open space and schools, and locations of growth nodes/corridors/centers.

Table 1. Housing Prototypes by Zone

Housing Prototypes	Dwelling Units Per Acre	Manufactured Home Park*	Low-Scale Neighborhood	Medium-Scale Neighborhood	Mixed-Use Neighborhood	Regional Activity Center	Institutional/ Campus	Industrial/ Employment*	Heavy Industrial*	Parks/Open Space/ Natural Areas*
Single Family	7.3									
Duplex (side by side)	14.5									
Duplex (stacked)	14.5									
3 Townhouses	21.8									
Quadplex	28.5									
4 Townhouses	29.0									
Sixplex	43.0									
6 Townhouses	43.6									
Cottage Cluster	29.0									
Courtyard (attached)	28.5									
Small Single Stair	58.1									
Small Multiunit	43.6									
Small Multiunit (taller)	58.1									
Medium Multiunit	34.8									
Medium Multiunit (taller)	52.3									
3-story wood frame	65.3									
4-story wood frame	84.4									
Podium	152.5									
Tower	217.8									
Microunits 1	273.8									
Microunits 2	342.3									

*No housing prototypes are allowed

2. Land Capacity Analysis Deductions (Preferred Alternative)

Table 2 identifies the deductions used in the land capacity analysis model for the Preferred Alternative. As noted in the table, some deductions are different in the housing capacity analysis, which estimates the capacity for new housing units, compared to the employment capacity analysis, which estimates the capacity for new jobs. Table 2 also identifies different deductions for the land categories (Vacant, Underutilized, and Built) included in the Clark County Vacant Buildable Lands Model (VBLM).[1]

[1] The parcel dataset used in the model is the 2022 Clark County Vacant Buildable Lands Model (VBLM) data output.

Table 2. Deductions

Deduction	Zoning District						
	LSN	MSN	MU	RAC	IC	IE	HI
Land Use Split per Zoning Districts[a]							
Residential	95%	90%	65%	60%	25 %	0%	0%
Employment[b]	5%	10%	35%	40%	75 %	100%	100 %
Critical Areas/Constrained Land Deductions							
Residential Capacity Analysis	50% of constrained lands are assumed to not develop.					N/A	
Employment Capacity Analysis	20% of Vacant and Underutilized constrained lands will not develop. 50% of Built constrained lands will not redevelop.						
Infrastructure Deduction							
Residential Capacity Analysis	31.5%					N/A	
Employment Capacity Analysis	31.5%					12.5%[d]	25%
Market Factor and Redevelopment Rate							
Residential Capacity Analysis	N/A (embedded in market feasibility analysis, see Section 3).						
Employment Capacity Analysis Market Factor	10% of Vacant and Underutilized lands will not develop given market conditions.						
Employment Capacity Analysis Redevelopment Rate (only applies to Build land)[e]	0%		12.8%	27.4%	0%		
Job loss deduction[f]			13 jobs/net acre				
Small Parcels, Easements, and Tax Value							
Exclude small parcels less than 1,000 SF	Applies to all zoning districts.						
Exclude roads and easements	Applies to all zoning districts.						
Exclude parcels given a zero value in Clark County's VBLM output[g]	Applies to all zoning districts.						

Notes:

(a) The residential/non-residential splits are model assumptions based on likely development trends for new zoning districts. These are not intended to reflect future codified requirements.

(b) Employment represents any non-residential use that is assumed to produce jobs instead of housing units.

(c) Critical areas/constrained lands were identified per the 2022 Clark County VBLM dataset

(d) Infrastructure deductions for IE are lower than the 25% used in the 2022 Clark County VBLM for Industrial to account for the more urban context in Vancouver.

(e) Redevelopment from employment uses to different employment uses in Low Scale Neighborhood (LSN), Medium Scale Neighborhood (MSN), Institutional/Campus (IC), and Industrial/Employment (IE) zones is unlikely and, therefore, no redevelopment rate is assumed for these zoning districts. However, an "intensification or refill" factor is applied to IE and Heavy Industrial (HI) zoning districts to establish the employment need (see Section 4 for details on the intensification factor). Redevelopment rates for Mixed Use Neighborhood (MU) and Regional Activity Center (RAC) were calculated by determining the feasibility of the four-story mixed-use prototype across all MU/RAC zones and its rate of feasibility.

(f) The job loss deduction applies to Built land in the MU and RAC zoning districts that is assumed to be redeveloped. This assumption accounts for a loss of existing jobs on the redeveloped parcels.

(g) The county assessor will flag a property as zero-value if appraisers determine the legally created tax lot does not have market value or is deemed exempt from taxes.

Key: HI = Heavy Industrial; IC = Institutional/Campus; IE = Industrial/Employment; LSN = Low Scale Neighborhood; MSN = Medium Scale Neighborhood; MU = Mixed Use Neighborhood; N/A = not applicable; RAC = Regional Activity Center; SF = square feet; VBLM = Vacant Buildable Lands Model

3. Housing Feasibility Analysis

The housing capacity analysis for the preferred alternative relies on a parcel-level feasibility analysis. The feasibility analysis examined the zoning district for each parcel, which prototypes are assumed to be allowed by future zoning, and which prototype is the most feasible option based on market conditions and available assessors' data.

Generally, the feasibility analysis examined the following factors:

- Total value per square foot of each parcel, which is equal to the total market value (land and buildings) divided by assessed acres.
- Price per square foot required to develop each building prototype.

If the total value per square foot is less than the prototype price to develop, then the prototype is considered feasible.

The feasibility analysis identified which prototypes would be considered feasible from a market perspective, which can result in multiple prototypes being viable. The model for the Preferred Alternative assigns the prototype that is considered the most feasible, or the prototype that is the most likely to develop because it is the most affordable to develop. Ultimately, this process looks at every parcel across the city and models the potential for a property to develop/redevelop. Only parcels identified as feasible with a corresponding prototype are included in the capacity analysis in Step 4 below. An overview of the feasibility analysis is included as Attachment .

4. Parcel-Level Modeling of Housing and Job Capacity (Action Alternatives)

Once the feasibility analysis (Section 3) was complete, analysts modeled housing and job capacity for the preferred alternative, applying the assumptions identified in Table 1. The following subsections identify the modeling process for the housing capacity analysis and job capacity analysis. A detailed process of this section is included as Attachment .

Housing Capacity Analysis

The first step in the housing capacity analysis model applied the deductions for critical areas, infrastructure, and residential versus employment allocation at the parcel level (see Table 2). The model then removed parcel fragments (1,000 square feet or smaller), roads/easements, and zero-value parcels.

Once all land reductions were applied, the model used the remaining net acreage to apply housing densities based on the most feasible prototype per the feasibility analysis (see Section 3). If a parcel was not determined to have a feasible prototype, then housing density was not applied to the parcel.

Housing Unit Yield Equation

Gross Acreage of a parcel – land reductions = net acreage

Net acreage X DUA (prototype DUA) = housing unit output per parcel

Post-Processing Deductions

Homeowner Association Deduction

The City sampled properties in different subdivisions across Vancouver to determine the possible existence of a homeowner association (HOA) that might limit densification or redevelopment potential. Then, using property titles obtained through a title company, analysts reviewed language in homeowner association bylaws to identify which areas may have language that could restrict the implementation of Washington State House Bill (HB) 1110. HOAs that had some degree of restrictive language were identified and the redevelopment capacity that was modeled in those areas was reduced by 70%. The 70% housing capacity reduction assumes that some of the redevelopment potential of parcels within HOAs with restrictive language would not occur because of a lack of enforcement of HOA policies. At the time of this analysis in early 2026, HB 1110 does not include retroactive application to pre-existing governing documents adopted by HOAs.

Master Plan Deduction

In areas where the city has adopted Master Plans or approved Development Agreements (DAs), the housing units and jobs projected in those documents was used instead of the model output. This requires an override where the existing master plan geography is allocated the projected number of housing units and/or jobs identified in the adopted plan or DA. At the time of this analysis in early 2026, the following master plan or DAs were identified:

- Vancouver Heights
- Vancouver Innovation Center
- Columbia Palisades
- Section 30
- Waterfront
- HQ Vancouver

Existing Unit Deduction

Clark County assessor data was used to identify the number of existing units on lots that include feasible housing development per the feasibility analysis. Existing units were then deducted to avoid double counting the total number of units per lot.

Model Output

Total number of housing units assumed in the preferred alternative based on market feasibility, land capacity, and HOA, Master Plan or DA, and existing unit adjustments. These housing unit numbers are used for the Preferred Alternative in the FEIS analysis.

Employment Capacity Analysis

The employment capacity analysis was similar to the housing analysis, but as identified in Table 2, some of the model assumptions were different. Additionally, the employment capacity analysis did not use the feasibility analysis to determine redevelopment potential, but instead applied a redevelopment rate, as noted in Table 2.

Employment Target

An additional step in the employment capacity analysis was the establishment of an employment target that accounts for "work-from-home" jobs and "intensification" or "refill," which relates to a percentage of new jobs occurring within existing employment space through an intensification of the number of jobs per square foot. These two factors reduce the amount of land needed to support anticipated job growth and are an important consideration when determining whether the employment capacity of an alternative will meet the anticipated employment growth. At a summary level, the process for determining the employment target was as follows:

- Start with the anticipated employment growth of 43,198 jobs, as detailed in the Economic Opportunity Analysis.
- Separate potential job growth by industry sector based on two-digit North American Industry Classification System (NAICS) codes and assign jobs/NAICS codes to zoning districts.
- Apply a 13% deduction for "work from home" to all job sectors except transportation, food/services, manufacturing, and construction.[2]
- Apply a 23% deduction for jobs in HI and IE zoning districts because these districts may see an intensification of jobs within existing heavy industrial or employment developments. This means more jobs per acre may be produced in the future on heavy industrial or employment lands than currently exists, and a reduction is applied to the employment target because additional land would not be needed to support these jobs.[3]

This process resulted in a net employment need of 38,792, which reflects the number of new jobs that will need to be supported within the land capacity of the Preferred Alternative. The deductions above account for new jobs that could be accommodated within existing developments or from work from home and therefore, additional land capacity is not needed for those jobs.

Employment Land Capacity Analysis

Similar to the housing capacity analysis, the employment capacity analysis was conducted at the parcel level. The first step in the employment capacity analysis model applied the deductions for critical areas, infrastructure, and residential versus employment allocation, as identified in Table 2. The model then applied the market factor for Vacant and Underutilized land and redevelopment rate for Built land, as detailed in Table 2. *Note: the redevelopment rate does not apply consistently across the zoning districts.*

Once all the land reductions were applied, the model applied the employment densities (jobs per acre) listed below for each zoning district.[4]

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[2] Work-from-home deduction is based on 2023 American Community Survey estimates, table B038601, work from home percentage for Vancouver. Clark County is at 21.8% per the same data.

[3] The intensification factor is based on data from Portland vetted with industrial stakeholders as part of Portland's EOA (Economic Opportunity Analysis)Industrial Land Committee process. Longitudinal point-level Quarterly Census of Employment Wage data for Vancouver are not available. Intensification is essentially "refill," indicating an amount of land that will intensify in job density.

[4] The employment densities are based on recent development trends in similar contexts and professional judgment.

- LSN: 6
- MSN: 6
- MU: 48
- IC: 46
- RAC: 54
- IE: 30
- HI: 9

The final step in the employment capacity analysis is intended to avoid double counting existing jobs when a property is assumed to redevelop. Washington Employment Security Department Quarterly Census of Employment Wage data was used to determine the average jobs per acre within future MU and RAC zoning districts. Only the MU and RAC zoning districts were used because those are the only zones where a redevelopment rate is applied (see Table 3 footnotes for additional details). The average number of jobs per acre was estimated at 13, which was applied as a deduction to the output of jobs on built parcels in MU and RAC zoning districts.

Employment Yield Equation:

Gross Acreage of a parcel – land reductions X market factor/redevelopment rates = net acreage

Net acreage X jobs/acre – 13 jobs/acre on Built Mixed Use Neighborhood and RAC parcels = jobs output per parcel

Model Output: Total number of jobs assumed in the preferred alternative based on vacancy status and redevelopment potential.

5. Model Outputs for Housing and Jobs Capacity

Table 3 below shows the model output for the DEIS action alternatives, the No Action Alternative, and the Preferred Alternative.

Table 3. Model Outputs for Housing Yields and Employment Yields

Alternative (City Only)	Methodology	Housing Yields	Employment Yields
No Action	Clark County VBLM (refer to DEIS methodology memo)	29,600 units	16,600 jobs
Alternative 1	Feasibility/Redevelopment potential (refer to DEIS methodology memo)	45,100 units	46,000 jobs
Alternative 2	Feasibility/ Redevelopment potential (refer to DEIS methodology memo)	50,696 units	49,300 jobs
Preferred Alternative	Feasibility/Redevelopment Potential (Refer to Section 4)	44,111 units	45,145 jobs

Key: VBLM = Vacant Buildable Lands Model

Attachment 1

Feasibility Analysis Overview

DATE:	May 27th, 2025
TO:	Nicole McDermott and Sam Rubin, WSP
FROM:	Tyler Bump and Michelle Anderson, ECOnorthwest
SUBJECT:	Vancouver Comp Plan Update – Market Feasible Capacity Analysis

Overview

WSP partnered with ECOnorthwest to assess the potential housing capacity for two different EIS alternatives for the comprehensive plan update for the City of Vancouver. ECOnorthwest worked with WSP to complete this analysis, referred to as the *market-feasible housing capacity,* given the potential land use intensities of the different place types of the alternatives. The difference between the alternatives was the place type designated to each parcel, which could result in different citywide totals for market-feasible housing capacity.

For the capacity analysis, ECOnorthwest completed a financial analysis that models a developer's decision-making process and cash flow equation. We created pro forma models to test the financial feasibility of various housing densities that might be allowed in different place types. We estimated the market feasible capacity of multiple prototypical developments, or *housing prototypes*. These prototypes reflect theoretical development profiles that could potentially comply with proposed zoning standards to understand what the market was most likely to deliver if zoning was a constraint.

Why is development feasibility and pro forma analysis important?

Development can be costly and risky. Getting funding to construct new development requires lenders and investors to be reasonably confident they will earn enough financial return to justify the risks and attract equity to a project.

Economic or market feasibility is generally assessed by comparing the expected revenues (home sales, net income from rents, room rates) against the costs of development. If a development is not feasible, it will not be built, contrary to a city's housing goals.

Approach

Prototypes and Assumptions

ECOnorthwest analyzed nearly 20 housing prototypes that were of various configurations and resulting densities, including general forms such as single-family, townhome, lowrise, garden-style, and midrise apartment developments. We based the prototypes on recent existing developments throughout the City of Vancouver as well as potential scales of housing that might be allowed in the future given legislative changes at the state level. Though the scale of development ranges substantially throughout the city, we developed approximate prototypes that could be possible in Vancouver.

We drew our initial market and construction cost insights from third-party sources such as the American Community Survey (ACS), Costar, Redfin, and Craftsman, and then vetted

those assumptions with local developers and brokers through various interviews. Though cost assumptions typically stay consistent throughout a city, we created a model to help differentiate the revenue assumptions (i.e., rent and sales prices) by census tract This model used rent and sales data from ACS, to interpolate what revenue assumptions might be for each census tract in the city.[1]

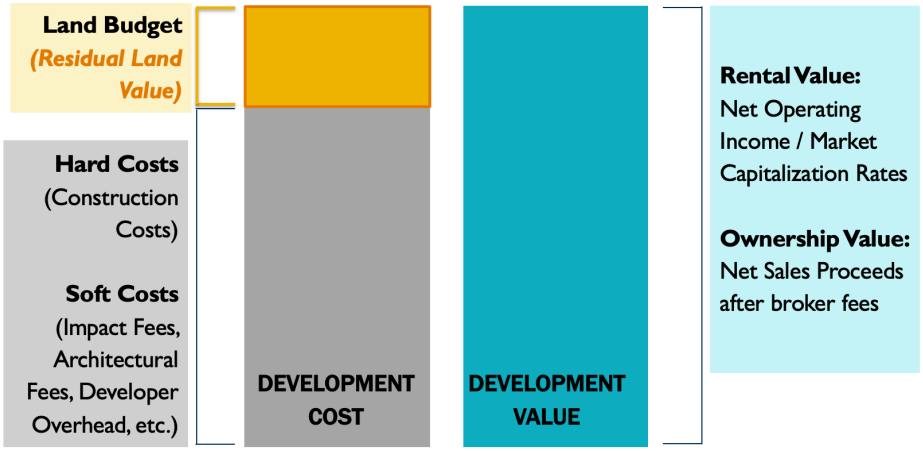
We then aligned similar block groups, based on rent and sales prices, into newly-defined market areas. We took those results and compared them to the city-wide average to understand how each market area related to the city-wide average (expressed as a ratio). We then applied that ratio as an input to each rent or sales price on a prototype level with the most up-to-date market data from CoStar and Redfin. This revenue model allowed us to refine our pro forma results spatially. The model therefore considered that different areas across Vancouver would have varying demand for different types of housing, which impacts the resulting feasibility of housing development.

Pro Forma Financial Analysis Methods

The pro forma model used a residual land value (RLV) metric to evaluate feasibility. RLV measures the land budget a developer would have to purchase land after accounting for potential development costs and revenues.

Exhibit 1: Example of Feasible Development using Residual Land Value (RLV) Model

Source: ECONorthwest



[1] ACS has two notable limitations we try and correct for: 1) there are many instances of tracts with missing (or "NA") estimates for rents, due to low rates of survey response or simply because there are no observations of a given type of apartment in that tract and 2) we often see unusually low rents because the ACS conflates market rate apartments with other structures like informal rental arrangements. We interpolated missing rent values by using an inverse-distance weighted average smoothing function, so that tracts with missing values take the average of their neighbors, ordered by proximity. We then cluster census tracts together into market areas (approximately 10 total areas) based on adjacency and similarity of rents and tenure splits.

Generally, if the RLV is equal to or above land prices in the potential development area, the development is considered feasible at market rate. If the RLV is zero dollars, the development could be feasible if land were donated for free. However, if the RLV is less than zero, the development is likely infeasible unless a developer receives additional subsidies or incentives, including free land. Results from this method describe a general analysis of prototypes and does not consider the many potential unique conditions that could be factors in development feasibility (e.g., increased predevelopment costs, low land basis from longtime land ownership). For these reasons, residual land value analyses should be thought of as a strong indicator of the relative likelihood of development, rather than an absolute measure of return to the investor or developer for any specific site.

In our feasibility analysis, we used key financial data like rent, operating costs, and development expenses for each prototype. To evaluate rental prototypes, we determined the leasable square footage, calculated revenue, deducted vacancy and operating costs (such as taxes, insurance, maintenance, management, select utilities) and arrived at the annual net operating income (NOI). For the ownership prototypes, we calculated gross sales price and subtracted commissions.

We calculated development costs by applying the cost per square foot values to different product types (e.g., residential, retail) and adding parking costs. We then summed those values to a total hard cost and calculated the soft cost, contingency, and developer fees to arrive at the total development cost.

To evaluate rental prototypes, we derived the value for each prototype by either dividing the NOI by a market-driven return on cost threshold (for higher-density prototypes) or by determining the loan capacity given debt service assumptions and NOI (for lower density prototypes). Return on cost is an important metric because it establishes the threshold where the potential returns offset project risks. Developers compete for capital in a market against other real estate and non-real estate investments. If return on cost is too low, a developer will not be about to attract capital, and the project will not move forward – this is most relevant for higher density prototypes that tend to attract institutional capital that is mobile across markets and investment products. We then summed those values to arrive at a total value for each prototype. We then calculated the land budget (the RLV) by subtracting the total development cost from the total value.

For lower-density rental prototypes, relating NOI to debt service requirements is more appropriate given that these projects are smaller and therefore tend not to attract institutional capital, but they are similar to larger projects in that debt is typically the largest source of funding for a project and if return requirements for debt can't be met, the development will not be able to attract the capital and the project won't move forward. For these prototypes, we solved for the land budget (the RLV) that was possible given the NOI on the project and potential terms, interest rates, and debt service coverage ratio

requirements. For the ownership prototype, we determined the land budget by subtracting total development costs from gross sales less commission and a spread on cost to account for profit.

For both rental and ownership prototypes we divided the total land budget by site square footage, arriving at a residual land value per square foot of land for each market area – this was the key variable for inclusion in the site specific analysis we conducted with the help of WSP.

Site-Specific Capacity Analysis

We delivered two key outputs for comparison to site-specific data and to finalize the market-feasible capacity analysis. For each prototype, we delivered both the calculated dwelling units per acre as well as the residual land value (RLV) per square foot of land for each market area. The units of these outputs (normalized by land area) allowed us to take the data and apply it to each site.

For each parcel, WSP and ECOnorthwest:

1. Exported a GIS csv with each parcel's market area, placetype, and key assessor data such as parcel area and total value (based on land and improvement value).
2. Calculated the total value per square foot of land (land + improvement value, divided by site area). This approach does not attempt to make adjustments to assessor's land value to values that are more reflective of real market value. We typically find that assessor data can lag behind market value. Therefore, this approach will result in an optimistic estimate of capacity
3. Subtracted total value per square foot of land from the RLV per square foot of each prototype for the corresponding market area to arrive at the remaining value.
4. Identified the feasible prototypes that were allowed by the placetype applied to the parcel – the prototype with remaining value greater than $0.
5. For parcels where the RLV was zero or negative (where the total value based on assessor data exceeded the RLVs of the allowed prototypes), the market-feasible capacity analysis resulted in no feasible housing prototype.

Attachment 2

Land Capacity Analysis Process

Land Use Model – Step-by-Step Process

The land use model for the Our Vancouver Comprehensive Plan was developed using Python in ArcGIS Pro. Instead of estimating land capacity based on broad citywide acreage, the analysis is conducted at the parcel level scenario, making it easier to show where housing and jobs are likely to be located across Vancouver. Housing and employment analyses are done separately, relying on the same data but with different assumptions about redevelopment, infrastructure, and critical areas.

1. Starting Datasets

- 2022 Vacant Buildable Lands Model (VBLM) dataset. Only parcels within the City of Vancouver are used in the land capacity analysis.
- Parcel-level feasibility analysis based on zoning. This analysis determines if a parcel is considered feasible for development and what prototype is most feasible by parcel.

2. Land Capacity Analysis

- Start with the 2022 VBLM dataset that has been updated to reflect the zoning or comprehensive plan designation assigned to the various alternatives.
- Apply filters to exclude land types **not eligible for development**:
    - **Infrastructure rights-of-way and easements**: roads, rail, utility corridors, etc.
    - **Public ownership exclusions**: parks and other tax-exempt lands unless redevelopment is anticipated. Coordination with the parks department is needed to update the inventory.
    - **Parcels below minimum size thresholds** or lacking infrastructure access may be excluded.
        - Parcels less than 1,000 square feet are excluded.
- **Split the remaining land by intended use**:
    - Allocate percentage of parcel acreage to either **residential or employment uses** (jobs/housing split) based on zoning.

        - From this point in the analysis, only the assigned acreage is used for either residential or employment analysis.

- Apply further deductions:
    - **Critical areas**: Critical areas identified by the County's VBLM process and are considered 'constrained' in the dataset.
        - Development in critical or constrained areas is limited. For housing analysis, lands in critical areas are counted at half their total area. For employment analysis, vacant or underutilized constrained lands are reduced by 20%, while built constrained lands are reduced by 50% in the calculation.
    - **Market factor for Employment**: proportion of land that will realistically be developed within the planning timeframe.
        - 10% of Vacant or Underutilized lands will not develop given market conditions. 10% reduction in total acreage by parcel is deducted.
    - **Redevelopment Rate for Employment:** 12.8% of lands zoned Mixed Use are anticipated to be redeveloped. 27.4% of lands zoned Regional Activity Center are anticipated to be redeveloped.
    - **Infrastructure:** proportion of land within a parcel that would be allocated for infrastructure placement.
        - 31.5% deduction in total acreage of a parcel for residential analysis
        - 31.5% deduction in total acreage of a parcel for employment analysis for all zones except Industrial/Employment (IE) and Heavy Industrial (HI). IE has a reduction of 12.5% and HI has a reduction of 25%.

3. Apply Density/Intensity Ratios

- Assign densities to each parcel based on their zoning. Density ratios are applied to the acreage remaining after deductions.
    - Residential: units per acre based on typology identified during feasibility analysis.
    - Employment: jobs per acre based on zoning.

4. Apply loss of existing jobs on redeveloped parcels

- The job loss deduction applies to Built (as determined by the Vacant Buildable Lands Model) land in the MU and RAC place types that are assumed to be redeveloped. This assumption accounts for a loss of existing jobs on the redeveloped parcels.
    - Reduce the number of jobs by parcel by 13 jobs/net acre.
- This analysis was done post-processing and is not included in the python notebook.

Housing Capacity Analysis (Python Notebook)

```
import arcpy
alt = "DatasetName"

new_field_name = "HousingYields"
new_field_type = "DOUBLE"

fields = [f.name for f in arcpy.ListFields(alt)]
if new_field_name not in fields:
   arcpy.AddField_management(alt, new_field_name, new_field_type)
   print(f"Field '{new_field_name}' added to {alt}.")
else:
   print(f"Field '{new_field_name}' already exists in {alt}.")

with arcpy.da.UpdateCursor(alt, ["HousingAcres", "DUAforPrototype", "GrossAcres",
"Constrained", "AlternativeZoning", new_field_name, "ExcludedParcels","VBLMStatus"]) as
cursor:
   for row in cursor:
      # First Deduction: Constrained vs nonConstrained land
      if row[3] == 0 or row[3] is None:
         row[0] = row[2]
      else:
         row[0] = row[2] * .5

         #filters
      if row[6] == "Road or Easement":
         row[0] = 0
      if row[2] < .022:
         row[0] = 0
      if row[7] == "Zero Value":
         row[0]= 0


      housing_yield = row[0]
      # 2nd Deduction: Development Assumption
      if row[4] == "LSN":
         housing_yield = housing_yield * .95
      elif row[4] == "MSN":
         housing_yield = housing_yield * .90
      elif row[4] == "MU":
         housing_yield = housing_yield * .65
      elif row[4] == "IC":
         housing_yield = housing_yield * .25
```

```
    elif row[4] == "RAC":
      housing_yield = housing_yield * .60
    elif row[4] == "IE":
      housing_yield = housing_yield * 0
    else:
      housing_yield = housing_yield * 0


    # 3rd Deduction: Infrastructure
    if row[4] == "LSN" or row[4] == "MSN":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "MU":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "IC":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "RAC":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "IE":
      housing_yield = housing_yield - (housing_yield * .315)
    else:
      housing_yield = 0

    # Housing Yields Estimate
    row[0] = housing_yield
    try:
      row[5] = housing_yield * row[1]
    except:
      row[5] = housing_yield * 0

    # Update the row
    cursor.updateRow(row)

print("Field values calculated and updated.")
```

Employment Capacity Analysis (Python Notebook)

```
import arcpy

alt = "LandUseAlt1_Scenario2"

new_field_name = "EmploymentAcres"
new_field_type = "DOUBLE"

new_field_name2 = "EmploymentYields"
new_field_type2 = "DOUBLE"

fields = [f.name for f in arcpy.ListFields(alt)]
if new_field_name2 not in fields:
  arcpy.AddField_management(alt, new_field_name2, new_field_type)
  print(f"Field '{new_field_name2}' added to {alt}.")
else:
  print(f"Field '{new_field_name2}' already exists in {alt}.")

fields = [f.name for f in arcpy.ListFields(alt)]
if new_field_name not in fields:
  arcpy.AddField_management(alt, new_field_name, new_field_type)
  print(f"Field '{new_field_name}' added to {alt}.")
else:
  print(f"Field '{new_field_name}' already exists in {alt}.")

with arcpy.da.UpdateCursor(alt, ["HousingAcres", "MaxDUA", "GrossAcres", "Constrined",
"AlternativeZoning", new_field_name, "Excluded",
"LandUseAlt2_VUGA_VBLM_Details_utilizatio", new_field_name2]) as cursor:
  for row in cursor:
    #VACANT
    if row[7] == "Vacant" or row[7]== "Underutilized":
      # First Deduction: Constrained vs nonConstrained land
      if row[3] == 0 or row[3] is None:
        row[5] = row[2]
      else:
        row[5] = row[2] * .8

      #filters
      if row[6] == "Road or Easement":
        row[5] = 0
      if row[2] < .022:
        row[5] = 0
      if row[7] == "Zero Value":
```

```
    row[0]= 0

employment_acres = row[5]
# 2nd Deduction: Employment land Splits
if row[4] == "LSN":
    employment_acres = employment_acres * .05
elif row[4] == "MSN":
    employment_acres = employment_acres * .1
elif row[4] == "MU":
    employment_acres = employment_acres * .35
elif row[4] == "IC":
    employment_acres = employment_acres * .75
elif row[4] == "RAC":
    employment_acres = employment_acres * .4
elif row[4] == "IE":
    employment_acres = employment_acres * 1
elif row[4] == "HI":
    employment_acres = employment_acres * 1
else:
    employment_acres = employment_acres * 0

# 3rd Deduction: market supply factor deduction
employment_acres = employment_acres - (employment_acres * .1)

# 4th Deduction: Infrastructure
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "MU":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "RAC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IE":
    employment_acres = employment_acres - (employment_acres * .125)
elif row[4] == "HI":
    employment_acres = employment_acres - (employment_acres * .25)

# Employment Acres estimate
row[5] = employment_acres

# 5th Deduction: Apply Job Density by placetype
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres * 6
```

```
    elif row[4] == "MU":
      employment_acres = employment_acres * 48
    elif row[4] == "IC":
      employment_acres = employment_acres * 46
    elif row[4] == "RAC":
      employment_acres = employment_acres * 54
    elif row[4] == "IE":
      employment_acres = employment_acres * 30
    elif row[4] == "HI":
      employment_acres = employment_acres * 9
    else:
      employment_acres = employment_acres * 0

    # Employment Yield estimate
    row[8] = employment_acres

  else:
    # First Deduction: Constrained vs nonConstrained land
    if row[3] == 0 or row[3] is None:
      row[5] = row[2]
    else:
      row[5] = row[2] * .5

    #filters
    if row[6] == "Road or Easement":
      row[5] = 0
    if row[2] < .022:
      row[5] = 0
    if row[7] == "Zero Value":
      row[0]= 0

    employment_acres = row[5]
    # 2nd Deduction: Employment land Splits
    if row[4] == "LSN":
      employment_acres = employment_acres * .05
    elif row[4] == "MSN":
      employment_acres = employment_acres * .1
    elif row[4] == "MU":
      employment_acres = employment_acres * .35
    elif row[4] == "IC":
      employment_acres = employment_acres * .75
    elif row[4] == "RAC":
      employment_acres = employment_acres * .4
    elif row[4] == "IE":
```

```
    employment_acres = employment_acres * 1
elif row[4] == "HI":
    employment_acres = employment_acres * 1
else:
    employment_acres = employment_acres * 0

# 3rd Deduction: redevelopment
if row[4] == "MU":
    employment_acres = employment_acres * .128
elif  row[4] == "RAC":
    employment_acres = employment_acres * .274
elif  row[4] == "IE":
    employment_acres = employment_acres * 0.0
elif row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres * 0.0
else:
    employment_acres = employment_acres * 0

# 4th Deduction: Infrastructure
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "MU":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "RAC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IE":
    employment_acres = employment_acres - (employment_acres * .125)
elif row[4] == "HI":
    employment_acres = employment_acres - (employment_acres * .25)

# Employment Acres estimate
row[5] = employment_acres

# 5th Deduction: Apply Job Density by placetype
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres * 6
elif row[4] == "MU":
    employment_acres = employment_acres * 48
elif row[4] == "IC":
    employment_acres = employment_acres * 46
elif row[4] == "RAC":
    employment_acres = employment_acres * 54
```

```
        elif row[4] == "IE":
            employment_acres = employment_acres * 30
        elif row[4] == "HI":
            employment_acres = employment_acres * 9
        else:
            employment_acres = employment_acres * 0

        # Employment Yield estimate
        row[8] = employment_acres

    # Update the row
    cursor.updateRow(row)

print("Field values calculated and updated.")
```

Appendix C: Current Land Use and Zoning Information

Table C-1. Current Vancouver Municipal Code Title 20 Zones and Development Standards

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
Residential (R)-2	Minimum: 20,000 s.f. Maximum: 30,000 s.f. Maximum Lot Coverage: 50% Minimum Lot Width: 100 feet Minimum Lot Depth: 100 feet	Minimum: 1.8 units/acre Maximum: 2.2 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 5 feet • Side Yard: 10 feet • Street Side Yard: 10 feet • Garage/Carport from Public/Private Street: 20 feet • Garage/Carport from Alley: 15 feet	35 feet	10%
R-4	Minimum: 10,000 s.f. Maximum: 19,000 s.f. Maximum Lot Coverage: 50% Minimum Lot Width: 80 feet Minimum Lot Depth: 90 feet	Minimum: 2.3 units/acre Maximum: 4.4 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 5 feet • Side Yard: 7 feet • Street Side Yard: 10 feet • Garage/Carport from Public/Private Street: 20 feet • Garage/Carport from Alley: 10 feet	35 feet	10%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
R-6	Minimum Lot Size: 7,500 s.f. Maximum Lot Size: 10,500 s.f. Maximum Lot Coverage: 50% Minimum Lot Width: 50 feet Minimum Lot Depth: 90 feet	Minimum: 4.5 units/acre Maximum: 5.8 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 5 feet • Side Yard: 0/5 feet • Street Side Yard: 8 feet • Minimum Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet	35 feet	10%
R-9	Minimum Lot Size: 5,000 s.f. Maximum Lot Size: 7,400 s.f. Maximum Lot Coverage: 50% Minimum Lot Width: 45 feet Minimum Lot Depth: 65 feet	Minimum: 5.9 units/acre Maximum: 8.7 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 5 feet • Side Yard: 0/5 feet • Street Side Yard: 8 feet • Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet	35 feet	10%
R-17	Minimum Lot Size: 2,000 s.f.	Minimum: 8.8 units/acre	• Front Yard: 10 feet	35 feet	10%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
	Maximum Lot Size: 4,900 s.f. Maximum Lot Coverage: 65% Minimum Lot Width: 25 feet Minimum Lot Depth: 65 feet	Maximum Net Density: 21.8 units/acre	• Rear and Through Yard: 5 feet • Side Yard: 0/5 feet • Street Side Yard: 8 feet • Minimum Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet		
R-18	Minimum Lot Size: 1,800 s.f. Maximum Lot Size: N/A Maximum Lot Coverage: 50% Minimum Lot Width: 20 feet Minimum Lot Depth: 50 feet	Minimum: 12 units/acre Maximum: 18 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 0/5 feet • Side Yard: 0/5 feet • Street Side Yard: 10 feet • Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet	50 feet	10%
R-22	Minimum Lot Size: 1,500 s.f. Maximum Lot Size: N/A Maximum Lot Coverage: 50% Minimum Lot Width: 20 feet	Minimum: 18.1 units/acre Maximum: 22 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 0/5 feet • Side Yard: 0/5 feet • Street Side Yard: 10 feet	50 feet	10%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
	Minimum Lot Depth: 50 feet		• Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet		
R-30	Minimum Lot Size: 1,500 s.f. Maximum Lot Size: N/A Maximum Lot Coverage: 55% Minimum Lot Width: 20 feet Minimum Lot Depth: 60 feet	Minimum: 22.1 units/acre Maximum: 30 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 0/5 feet • Side Yard: 0/5 feet • Street Side Yard: 10 feet • Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet	50 feet	10%
R-35	Minimum Lot Size: 1,200 s.f. Maximum Lot Size: N/A Maximum Lot Coverage: 60% Minimum Lot Width: 20 feet Minimum Lot Depth: 60 feet	Minimum: 30.1 units/acre Maximum: 35 units/acre	• Front Yard: 10 feet • Rear and Through Yard: 0/5 feet • Side Yard: 0/5 feet • Street Side Yard: 10 feet • Minimum Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet	60 feet	10%
R-50	Minimum Lot Size: 800 s.f.	Minimum:	• Front Yard: 10 feet	70 feet	10%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
	Maximum Lot Size: N/A Maximum Lot Coverage: 70% Minimum Lot Width: 20 feet Minimum Lot Depth: 60 feet	35.1 units/acre Maximum: 50 units/acre	• Rear and Through Yard: 0/5 feet • Side Yard Setback: 0/5 feet • Street Side Yard: 5 feet • Garage/Carport from Public/Private Street: 18 feet • Garage/Carport from Alley: 5 feet		
Neighborhood Commercial (CN)	Minimum Lot Size, Width, Depth: None Maximum Lot Coverage: Determined by screening and buffering standards, stormwater standards, erosion control regulations, and all other applicable development standards.	N/A	• Front Yard, Rear Yard, Rear through-Street, Side Yard, Street Side Yard Setbacks: See 'Minimum Setbacks Adjacent to Residential District' • Minimum Setback between buildings on Site: None • Minimum Setbacks Adjacent to Residential District: Pursuant screening and buffering standards and additional ½ foot for each foot the building exceeds 20 feet to a maximum setback requirement of 40 feet.	35 feet	15%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
			• Minimum Setbacks Adjacent to Nonresidential Districts: Pursuant to screening and buffering standards.		
Community Commercial (CC)	Same as CN	N/A	Same as CN	50 feet	15%
General Commercial (GC)	Same as CN, CC	N/A	• Minimum Setbacks Adjacent to Residential District: Pursuant screening and buffering standards.	None	15%
City Center (CX)	Minimum Lot Size, Width, Depth: None Maximum Lot Coverage: 100%	N/A	• Front Yard, Rear Yard, Rear through-Street, Street Side Yard: None • Side Yard: None except when abutting residentially zoned property when setback is 5 feet • Minimum Setback between buildings on Site: None • Minimum Setbacks Adjacent to Residential/Nonresidential Districts: N/A	Varies from 40 feet to 300 feet	None

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
Waterfront Mixed-Use (WX)	Minimum Lot Size, Width, Depth: None Maximum Lot Coverage: 70%	N/A	• Front Yard, Rear Yard: 25 feet, except parking lots and driveways at 10 feet • Rear through-Street: N/A • Side Yard: 5 feet • Street Side Yard: None • Minimum Setback between buildings on Site: None • Minimum Setbacks Adjacent to Residential District: N/A	60 feet	20%
Central Park Mixed Use (CPX)	No established development standards	N/A	N/A	N/A	N/A
Mixed-Use District (MX)	• Minimum Lot Size, Width, Depth: None • Maximum Lot Coverage: 100%	N/A	• Front Yard, Rear Yard: 10 feet when abutting a Residential zone; otherwise same as abutting zone • Rear through-Street, Side Yard Street Side Yard: N/A • Minimum Setback between buildings on Site: None • Minimum Setbacks Adjacent to Residential/Nonresidential Districts: N/A	35 to 75 feet	15%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
Heights District (HX)	• Minimum Lot Size, Width, Depth: None • Maximum Lot Coverage: 100%	No maximum, 30-75 dwelling units per acre minimum depending on subdistrict	• Front Yard, Rear Yard, Rear through-street, Side Yard, Street Side Yard: None • Minimum Setback between buildings on Site: None • Minimum Setbacks Adjacent to Residential/Nonresidential Districts: N/A	35 to 85 feet (subject to additional development standards of VMC Chapter 20.600, Plan Districts)	None
Office Commercial Industrial (OCI)	• Minimum Lot Size, Width, Depth: None • Maximum Lot Coverage: 100%	N/A	• Minimum Setbacks Adjacent to Residential District: Subject to screening and buffering standards plus an additional ½ foot for each foot the building exceeds 20 feet in height to a maximum setback requirement of 40 feet. Buildings in excess of 20 feet may be stepped. • Minimum Setbacks Adjacent to Nonresidential Districts: Subject to	35 to 75 feet	15%

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
			buffering and screening standards.		
Light Industrial (IL)	• Minimum Lot Size, Width, Depth: None • Maximum Lot Coverage: 75%	N/A	• Minimum Setbacks Adjacent to Residential District: Subject to screening and buffering standards plus an additional ½ foot for each foot the building exceeds 20 feet in height to a maximum setback requirement of 40 feet. Buildings in excess of 20 feet may be stepped. • Minimum Setbacks Adjacent to Nonresidential Districts: Subject to buffering and screening standards.	45 feet	10%
Heavy Industrial (IH)	• Minimum Lot Size, Width, Depth: None • Maximum Lot Coverage: 75%/100% - see Footnote 1 of VMC Table 20.440.040-1	N/A	• Same as IL	45 feet (or greater – see Footnote 2 of VMC Table 20.440.040-1)	None

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
Employment Center Mixed-Use (ECX)	No established development standards	N/A	Any development adjacent to the Principal Arterial streets bordering the Section 30 Plan District shall provide a 20-foot maximum setback. All other street setbacks shall be a landscaped 10-foot maximum from the back of sidewalk.	N/A	Per Section 30 Design Guidelines
Natural Areas (NA)	• Minimum Lot Size, Width, Depth, Coverage: None	N/A	• Front Yard, Rear and Through Yard, Side Yard, Street Side Yard: 20 feet	12 feet	None
Greenway (GW)–Vancouver Lake	• Maximum Lot Coverage: 5%	N/A	• Minimum Front Yard, Rear and Through Yard, Side Yard, Street Side Yard Setback: 20 feet	35 feet (Barns, silos, and similar features may exceed 35 feet)	None
GW – Lettuce Fields	• Minimum/Maximum Lot Size, Width, Depth: None • Maximum Lot Coverage: 5%	N/A	• Minimum Front Yard, Rear and Through Yard, Side Yard, Street Side Yard Setback: 20 feet	12 feet (except existing single-family residential, which is 35 feet)	None

Zoning District	Lot Size	Net Density	Minimum Setback Requirements	Maximum Building Height	Minimum Landscaping Requirements
GW – General	• Minimum/Maximum Lot Size, Width, Depth: None • Maximum Lot Coverage: 5%	N/A	• Minimum Front Yard, Rear and Through Yard, Side Yard, Street Side Yard Setback: 20 feet	35 feet	None
Park	• Development standards are subject to the most restrictive zoning district standards located adjacent to the subject property.	N/A	N/A	N/A	N/A

Source: Vancouver Municipal Code Chapter 20.410

Key: s.f. = square feet

Appendix D: Draft EIS Comment Period Outreach Summary

DRAFT EIS COMMENT PERIOD OUTREACH SUMMARY

Summary

Outreach directed people to learn about the findings in the Draft EIS, including the alternatives and potential impacts, and to provide comments.

- ~2,400 Be Heard visitors
- ~3,500 StoryMap views
- 22 total e-newsletter emails sent through three City email lists.
- 27 social media posts garnered 69,454 unique views.
- 100+ community groups, neighborhood associations, and boards/commissions directly emailed.
- 20 events:
  - Two interactive public meetings
  - Two virtual sessions
  - 11 presentations
  - One self-guided exhibit
  - Four tabling events
- Seven locations with outreach materials
- Nearly 600 promotional video views, also shown at three Movie in the Park events
- Two newspaper articles – The Columbian and the City's quarterly newsletter

Be Heard

The Be Heard page shared information about the Draft EIS, comment period, and how to comment and directed people to the StoryMap. Additional project information, such as upcoming events, project documents, and FAQs, was also available on Be Heard.

English

www.beheardvancouver.org/plan2045

July 8-September 8, 2025

- 4,325 total visits
- 2,389 total visitors

Spanish

www.beheardvancouver.org/planintegral

July 8–September 8, 2025

- 48 total visits
- 34 total visitors

StoryMap

The StoryMap summarized content in the Draft EIS, including an interactive map of the alternatives and bullet points of the potential impacts. Links to the comment form were provided throughout the StoryMap, and additional information about how to comment was provided at the end of the StoryMap.

English

https://storymaps.arcgis.com/stories/82d081f7815941bd85ca07270144a125

July 8 – September 8, 2025

- 3,348 total views
- 230 maximum views in a day on July 8

Spanish

July 8–September 8, 2025

https://storymaps.arcgis.com/stories/6b0aa78bb949497d8212b0859ddf2d1c

- 175 total views
- 48 maximum views in a day on July 21

E-newsletters

Our Vancouver

Emails notified recipients of the comment opportunity and upcoming events and contained links to additional information about these.

- 15 emails total
- Ranging between 646 and 704 recipients

Purpose	Date Sent	Recipients
Comment period open	7/8/2025	646

Upcoming events	7/11/2025	646
Virtual Session 1	7/16/2025	651
Virtual Session 1	7/21/2025	650
Virtual Session 1	7/22/2025	657
Firstenburg	7/23/2025	657
Firstenburg	7/29/2025	664
Firstenburg	7/30/2025	662
Event reminders	8/1/2025	661
Virtual Session 2	8/4/2025	677
City Hall	8/8/2025	683
City Hall	8/9/2025	682
Comment period	8/15/2025	704
HB 1110 info	8/20/2025	700
Comment period	9/5/2025	702

Vancouver Connects

Monthly citywide email list for various City-related news run by the City's Communications team.

- Comment period open – 7/9/2025
- Experience Our Vancouver 2045 - 8/8/2025
- HB 1110 info - 9/5/2025

Office of Neighborhoods Update

Twice a month email list to neighborhood leaders run by the City's Office of Neighborhoods.

- Comment period open – 7/11/2025
- How should Vancouver grow and develop? - 7/25/2025
- Experience Our Vancouver 2045 – 8/8/2025
- HB 1110 info – 8/22/2025

Social Media

Social media posts encouraged people to visit Be Heard and the StoryMap, then provide comments via the designated comment methods. Social media was also used to advertise the interactive public meetings and virtual sessions.

Facebook

10 total Facebook posts

Post	Date	Reach (# of unique people reached)	Interactions
Facebook post	7/8	8,962	119 interactions 193 link clicks
Video post	7/22	8,969	119 interactions 340 link clicks
Facebook community engagement events	7/15	925	13 interactions 4 link clicks
Facebook Community engagement events	7/26	1,550	22 interactions 7 link clicks
Facebook vertical comp plan video	8/4	913	22 interactions
Facebook Pooh Meme	8/6	1,069	4 interactions 5 link clicks
Facebook worth it reel	8/12	2,223	45 interactions
Facebook Cat Meme	8/25	1,024	6 interactions 1 link click
Facebook Swifty	8/29	5,951	68 interactions 32 link clicks
Engagement events post **Duplicated in Instagram section	7/29	8,306	70 interactions 391 link clicks

Instagram

13 total Instagram posts (Nine posts and four stories)

Post	Date	Reach (# of unique people reached)	Interactions
Instagram carousel intro	7/8	2,052	112 interactions
Instagram community engagement events	7/15	1,406	57 interactions
Instagram vertical comp plan video	7/23	2,225	110 interactions
Instagram community engagement events	7/26	795	15 interactions
Instagram post **Duplicated in Facebook section	7/29	8,306	70 interactions 391 link clicks
Instagram Pooh Meme	8/5	2,823	65 interactions
Instagram worth it reel	8/12	6,791	289 interactions
Instagram Cat Meme	8/25	1,749	34 interactions
Instagram Swifty	8/29	5,226	144 interactions
4 Instagram story posts	N/A	2,885	113 link clicks

LinkedIn

Four total LinkedIn posts

Post	Date	Reach (# of unique people reached)	Interactions
LinkedIn community engagement events	7/15	335	25 interactions 12 link clicks
LinkedIn community engagement events	7/26	486	33 interactions 16 link clicks
LinkedIn comp plan video	8/4	1,366	188 interactions 144 link clicks

LinkedIn Cat Meme	8/30	867	52 interactions 24 link clicks

Direct Emails

Staff directly emailed the following groups to share the comment opportunity and asked them to share the comment opportunity with their organization and other interested individuals/groups.

Community Based Organizations (27)

- Alliance for Community Engagement (ACE)
- Clark College, Office of Diversity, Equity, and Inclusion and student engagement staff
- Clark County Food Bank (CCFB)
- Climate Pub participants via City's climate team
- Columbia River Economic Development Council (CREDC)
- Fourth Plain Business Association
- Fourth Plain Forward (FPF)
- Friends of Clark County
- Fruit Valley Elementary parent-teacher group
- Heavy industrial stakeholders group
- Latino Leadership Northwest (LLNW)
- National Association for the Advancement of Colored People (NAACP)
- Native American Youth and Family Center (NAYA)
- Odyssey World International Education Services (OWIES)
- Peace and Justice Fair
- Port of Vancouver
- Pride Vancouver USA
- Queer Community Network
- Southwest Washington Accountable Community Health (SWACH)
- Southwest Washington Equity Coalition (SWEC)
- The Foundation
- Vancouver Bee Project
- Vancouver Downtown Association (VDA)
- Vancouver Farmers Market (VFM)
- Vancouver Neighborhood Alliance (VNA)
- Washington Conservation Action
- Washington State University - Vancouver

Neighborhood Associations (65)

- Airport Green
- Arnada
- Bagley Downs
- Bella Vista
- Burnt Bridge Creek
- Burton Ridge
- Burton-Evergreen
- Carter Park
- Cascade Highlands
- Cascade Southeast
- Central Park
- Cimarron
- Columbia River
- Countryside Woods
- DuBois Park
- East Mill Plain
- Edgewood Park
- Ellsworth Springs
- Emerald Landing
- Esther Short
- Evergreen Highlands
- Evergreen Shores
- Father Blanchet Park
- Fircrest
- First Place
- Fisher's Creek
- Fisher's Landing East
- Forest Ridge
- Fourth Plain Village
- Fruit Valley
- Green Meadows
- Harney Heights
- Hough
- Hudson's Bay
- Image
- Kevanna Park
- Landover-Sharmel
- Lewis and Clark Woods
- Lincoln

- Maplewood
- Marrion
- Meadow Homes
- Mountain View
- North Garrison Heights
- North Image
- Northcrest
- Northfield
- Northwest
- Northwood
- Oakbrook
- Ogden
- Old Evergreen Highway
- Parkway East
- Riveridge
- Riverview
- Rose Village
- Shumway
- Southcliff
- Uptown Village Association
- Vancouver Heights
- Village at Fisher's Landing
- Walnut Grove
- West Minnehaha
- Wildwood
- Woodland Meadows

Community Working Groups (CWGs) (7)

- Affordable housing developers
- Building Industry Association
- Business Leaders
- Climate
- Community-based organizations
- Market-rate housing developers
- Transportation

Boards and Commissions (6)

- City Council
- Planning Commission
- Transportation and Mobility Commission
- Urban Forestry Commission

- Parks and Recreation Advisory Commission
- City Center Redevelopment Authority

Presentations & Events

Staff presented – in-person and virtually – the findings of the Draft EIS and shared information about how to comment at the following events/groups. The interactive public meetings and virtual sessions were advertised on Be Heard and the City's website, through e-newsletters and direct emails, in canvassing and tabling materials, and during presentations.

Interactive Public Meetings

Posterboards, maps, and other materials in both English and Spanish were displayed in a room where people could drop by to learn about Our Vancouver and the Draft EIS, provide written comments (none received at either), and speak with project staff.

- 7/30/2025 - Experience Our Vancouver 2045 at Firstenburg
  - ➡ Appx. 40 attendees
- 8/9/2025 - Experience Our Vancouver 2045 at City Hall
  - ➡ Appx. 50 attendees

Virtual Sessions

- 7/22/2025 - Our Vancouver Virtual Session 1
  - ➡ Appx. 30 attendees
  - ➡ Presentation
  - ➡ Recording
- 8/4/2025 - Our Vancouver Virtual Session 2
  - ➡ Appx. 16 attendees
  - ➡ Presentation
  - ➡ Recording

Group-specific Presentations

- 7/8/2025 - Planning Commission Workshop
- 7/14/2025 - City Council Workshop
- 7/17/2025 - City Center Redevelopment Authority (CCRA)
- 7/26/2025 - National Association for the Advancement of Colored People (NAACP)
- 8/4/2025 - Building Industry Association (BIA) Community Working Group
- 8/4/2025 - City Council Workshop
- 8/7/2025 - Advancing Racial Equity, Diversity & Inclusion (AREDI) Summit
- 8/13/2025 - Transportation Community Working Group
- 8/26/2025 - Business Leaders Community Working Group

- 8/30/2025 - Cycle Vancouver
- 9/2/2025 - Transportation and Mobility Commission (TMC)

To raise awareness about the Draft EIS and comment period in the months leading up to the comment period, we also presented to several groups, including:

- Urban Forestry Commission (UFC)
- Parks and Recreation Advisory Commission (PRAC)
- Downtown Stakeholders meeting
- Other project working groups
- Groups convened by Native American Youth and Family Center (NAYA), Odyssey World International Education Services (OWIES), and Southwest Washington Equity Coalition (SWEC)
- Vancouver Neighborhood Alliance and at neighborhood association meetings

Self-guided Exhibit

Posterboards and maps from the interactive public meetings were displayed in the City Hall lobby for 12 business days, from 8/19/2025 to 9/4/2025.

Tabling

Posterboards were displayed and handouts and postcards were distributed at the following events. Staff spoke with attendees about Our Vancouver, the Draft EIS comment period, and upcoming events.

- 6/14/2025 - Juneteenth Freedom Celebration
- 6/21/2025 - Pollinator Festival
- 7/13/2025 - Sunday Sounds Concert Series
- 7/24/2025 - Waterfront Concert Series

Canvassing

Postcards in English, Spanish, Vietnamese, Russian, Ukrainian, Chinese (simplified), and Chuukese and handouts in English were dropped off at the following locations.

- City Hall lobby
- City Hall permit center
- Firstenburg Community Center
- Cascade Park Library
- Fourth Plain Commons
- Marshall Community Center
- Downtown Library

Additionally, by request, outreach materials were provided to:

- Central Park Neighborhood Association
- Village at Fishers Landing Neighborhood Association

Promo Video

A 2-minute video about the comprehensive plan update and comment opportunity had 599 views, with an average view duration of 1 minute and 19 seconds.

The video was embedded in the StoryMap, added to social media posts, and played as a trailer before the following Movie in the Park events:

- 8/1/2025 - Coco at Esther Short Park
- 8/8/2025 - Moana 2 at Bagley Community Park
- 8/22/2025 - Barbie at Columbia Tech Center Park

The video was also played on CVTV. The Spanish StoryMap had the same video with Spanish captions, and both StoryMaps included a link to a transcript of the video for added accessibility.

Print Media

City of Vancouver quarterly newsletter

- July 2025 - COV_CityNewsletter_July-2025.pdf

The Columbian

- 7/12/2025 - Vancouver document outlines environmental effects of 3 approaches to handling growth - The Columbian

Appendix E: Responses to Individual Draft EIS Comments

APPENDIX E: RESPONSES TO INDIVIDUAL DRAFT EIS COMMENTS

Summary

The City received a total of 440 responses during the Draft EIS Comment period from July 8 to Sept. 8, 2025:

- 330 total responses from the online comment form, of which 24 responses were incomplete forms and did not contain a comment.
- 94 comments via email, 6 of which were also submitted via online comment form/physical mail.
- 15 comments via physical mail, 1 of which was also submitted via online comment form/email.
- 1 comment via voicemail.

A total of 409 unique comments were received. Thirteen of these comments were received from agencies, businesses, or organizations. Chapter 6 of the Final EIS provides a more detailed summary of the themes of comments received and demographics of commenters.

How to View Responses to Draft EIS Comments

Table 1 provides a list of names for all comments received, alphabetized by last name. The first column provides the first and last name (as available) for the commenter, as well as associated organization or business (if applicable). The second column provides a corresponding Comment Identification number for the comment(s) submitted by that individual or organization.

- Comment IDs with numbers are those received via web form.
- Comment IDs with letters are those received using other methods (email, voicemail, mail, etc.)
- Duplicate comments that were received via multiple channels, i.e. sent via the online comment form and email, were given one Comment ID.
- Some commenters provided multiple comments and therefore have multiple comment IDs.
- Identifying information (including full addresses, email addresses, phone numbers, parcel numbers, etc.) has been removed from comment text as applicable.

Table 2 provides the full text of the comments and the City's responses. The far-left column provides the Comment ID number, which corresponds to those listed in Table 1. The comments and responses in Table 2 are provided in numerical or alphabetical order, starting with Comment IDs with numbers and followed by Comment IDs with letters.

Note: Many of the individual comment responses point readers to responses to 15 common comment themes. Chapter 6 of the Final EIS provides these common comment responses.

Comment Identification Table

Table 1. Index of Commenters, Alphabetized by Last Name

First and Last Name, Organization (if provided)	Comment ID
J. A.	CX
Marilyn Abbink	294, 297, CK
Kristin Abell and Vaughna Cochenour	AT
Howard Adler	125
Steven Alfi	1
Dana Amaya	213
Indigo Anderson	163
Nancy Anderson	158, 162
Robert Anderson	155
Sandra Anderson	209
Dusti Arab	59
Zachary Arnold	180
Jean Avery	B, 8, 148, G, H, AF
Schuyler Bagwell	76
Lynda B. Baker	92
Norman Ballou	132
Norman and Viki Ballou	Z
Vicki Ballou	Q, T
Richard Baranzano, Kauffman Center	BT
Harry Barber	144
Tina Barrows	25
Zachary Barry	321
David Beall	221
Cam Bennett	35
Laura Besserman	248
Susan Birnbaum	190
Cory Blaiss-Evans	311
Jeffery Blovitis	130
Kathyellen Blovits	145

First and Last Name, Organization (if provided)	Comment ID
Joshua Boelter	153
Mike Bomar, Port of Vancouver	BX
Jennifer Bragar, HP Inc.	BY
Van Brandtner	85
Cherie Briggs	239
John Briggs	52
Amy Brubaker	28
Peter Brubaker	P
Fred Bullert	233
Colleen Burch	185
Judi Burkdoll	BG, CQ
Charles Burns	AD, AC
Matt Burr	232
Anne Byrd	150, 151
Bryant Carlson	238
Terry Carlson	284
Rebecca Carter	74
Daniel Castenson	314
Kate Castenson	299
Greg Chaimov	3
Brian Chapman	116
Tawnia Chenette	174
Christina Cheng	206
Teresa Cheng	225
Wuu Cheng	223
A Beth Christensen	304
Joel Christiansen	109
Randall and Judy Christofferson	K
Jean Cipra	128
Adriana Clark	146
Robert Colquhoun	251
Leslie Conboy	CJ

First and Last Name, Organization (if provided)	Comment ID
Connie Cork	32, 118, 228
William Craine	AY, CL
Jay Crary	AS, BA
Maureena M. Cravens	300
Robert Cravens	266
Jason Cromer	201
Beverly Cruickshank	88
Patrick Curley	115
Brooke Delarosa	327
Peter Delmage	143
Franki DeMerle	14
James Dishongh	73
Zach Dishongh	75
Steve Doherty	192
Carole Dollemore	274
Lee and Sonjia Donham	CD
Ann and Michael Donnelly	36
Michael Donnelly	91, 183, 184, 315
Sue Doucette	312
Patricia Douglass	137, AB
Robert Douglass	259
Greg Dresher	58
Nolan Duckworth	114
Brent Eastes	45
Emily Eastes	160
Lynn Eastes	44
Lori Edenfield	182
Yvonne Eggers	13
Traci Ellis	39, 40, 55, D
Nathan Ernst	12
John Evans	328
Julie Falardeau	AK

First and Last Name, Organization (if provided)	Comment ID
Jolene Feeney	80
Peter Fels	10
Rae Fender	71
Cinty Finch	84
David Finch	122
Darrell Fluit	CT
Tracy Fortmann, Vancouver National Historic Reserve	BJ, AX
George Gadbury	22, 82
Joanne Garbarino	121
Yvonne Gensurowsky	6, 271
Jolene George	203, 330, R
Darci Gilbert	178
Jaynel Gilmore	329
Carl Green	105
Heidi Green	235
Jamison Green	305
Beth Greenberg	19
Steve Greiling	313
John H Greves	157
Mari Greves	BM
Ryan Grimm	308
Philip Gulling	301
Abhi Gupta	86
Claire Gutschow	117
AnnMarie Haldeman	175
Josh Hammock	129
Charles Hankel	263
Justine Hanrahan	15
Arthur Hanseler	AG
Tom Hansell	270
Bart Hansen	16
Steve Hansen	168

First and Last Name, Organization (if provided)	Comment ID
Steve and Jo Marie Hansen	AO
Kregg Hanson	224
Josh Harmon	286, 289
Elizabeth Harris	265
Shirley Hartman	60, CE
Anthony Haulk	159
David Hayes	BZ
Linda Hedden	204
Janet Heiden	161
Kyle Helm	66
Toni Henderson	CR
Tamira Hite	138
Geri Hoekz	29
Jan and Steve Holden	U
Eric Holmes, Columbia Business Center and Killiam Pacific	AZ
Morgan Holmgren	252
Stephen Horenstein, Southcliff Homeowners Association	BN
Brian Houng	51
Jamie Howsley	293
Roxane Richards Huang	229
Jennifer Hubbert	S
L. Hudson	211
Linda Huynh	F
Miles Jackson	18
Martin Jacobson	BF
Divya Jain	119
Keith James	79
Jessica	94
Melissa Johnston	165
Keith Jones	31
John Junker	120
Chris Keinath	285, CH

First and Last Name, Organization (if provided)	Comment ID
Con and Carol Kelleher	172, AQ
Patrick Kelley	108
Nathan Kelly	317
Ruth Kelly	309
Tabor Kelly	303
David Keudell	64
Joseph Killian	208
Jackie Kiso	283
Jacquelyn Kiso	280
Karen Knauss	244
Joe Krellwitz	205
Margot Krissiep	152
Larry Krotenko, Knipe Realty	186
Melinda Krupicka	102
Andrew Kung	20
Jeremy Lancaster	189
Denny Le	17
Bongil Lee	226
Hyun Lee	227
Maureen Lee	CI
Darlene Lehmann	CP
Maurene Leland	173
Temple Lentz, The Historic Trust	L
John Ley	38
Jason Lind	30
Israel Lopez	194, 195, 196, 197
T. Lora	110
Willie A Lora	111
H M	I
Elsa MacVicar	326
Raymond Maly	154
Bridget Marick	167

First and Last Name, Organization (if provided)	Comment ID
Bridget Marick & David Curran	AN, BI
Jacqueline Marsh	260
Mark Masciarotte	126, 181
Laura Mason	230
Atul Mathur, Village of Fisher's Landing Neighborhood Association	33, CV
William McBride	56
Brian McClary	96
John McDonagh	169
Jennifer McDonald	156
Merrilee McGough	CU
Nancy McKibbin	BH
Mary McMonegal	107
Deanna Meyer	188
John Miguel	255
Nancy Miller	187
David Moore	179
Beren Mowrer	89
Teri Moyer	BC
Rudolph Munzel	BU
Adam Murray	70
Carla Myers	104
Nela Nadeal	272
Susan Nellor	AP
Carolyn Noesen	83
Matt Noesen	164
Leann Nolan	BL
Michael Nolan	AE
Matthew Norvell	97
Barbara Nunn	BE, CN
Robert Nunn	CB
J. Chatham Olive	136
Janice Olive	78

First and Last Name, Organization (if provided)	Comment ID
Kaitlyn Olszewski	27
Katherine O'Neil	149
Ken Ono	46
Oliver Orjiako, Clark County Community Planning	BW
Emily P	281, 302
Constance Pappas	261
Chris Parks	BQ
Mitchell Parsons	135
Angela Paterson	287, 288
Rachel Paz	81
Paul Pedone	O, W, AU
David Pelkey and Family	CF
Nathan Petz	273
Maury Plumlee	43
Nancy Plumlee	298
K Pomeroy	69
Kay Pomeroy	72
Terrence Popravak	250
Terrence Popravak Jr	310
John Greg R	C
Lee Rafferty	AV
Stefani Randall	236
Adam Rasky	AM
Vera Rasmussen	100
David Rice	276
Enzo Rice	278
Leo Rice	279
Yvonne Rice	277
Francisco Patron Rivera	23
Barbara Roberts	171
Don Roberts	170
Mary Lou Roberts	243

First and Last Name, Organization (if provided)	Comment ID
MF Roberts	63
Jamie Robertson, Crown Point Real Estate Partners	262, CA
David Rogde	11
Julianne Rogers	246, BP
William Rogers	245, BR
Paul Rosa	A
Judy Rouleau	207
John Rudi	CW
Michele Rudi	247, BO, CO
Don and Deb Russo	X
Donald Russo	134
Sara Sallee	99
Brittney Salter, Washington Department of Fish and Wildlife	CM
Philippe Samama	J
Lynn Samuels	264
Marci Sauer	101
Marise S. Scott	267
Samin Sepasi	199
Sandy Sepasi	200
Angela Shaffer	269
Lance Shaffer	268
Scott Shannon	4
Taylor Shaw	257
Chad Sheron	240
Patricia Shore	123
Stacy Sim	50
Cindy Skrivanek	106
Kayla Slater	CX
Jennifer Small	166
Terry & LaVonne Smith	127
Sherri Sorensen	V
Shannon Soriano	AR

First and Last Name, Organization (if provided)	Comment ID
Shiloh Green Soto	E
Jon & Teri Spassov	BS
Sara Spraggins	9
Todd Spraggins	CS
Don Steinke	41
Gary Stewart	67
Elson Strahan, Southcliff Neighborhood Association	N, Y
Elson and Jan Strahan	AL
Karen and Mark Streeter	CG, AW
Douglas Stutesman	124
Maureen Sullivan	296
Mara Sunshine	5
Katie Sutliff	176
Heather & Darrell Swoap	210
Tyler Tate	202
Annette Taylor	141
Bill and Lori Thayer	BV
James Tolson	54
Julia Trabert	295
Michael Trabert	322
Rolan Tripp	61
Leonardo Tunes	7
Luke Vander Weide	65
Jan Verrinder	214, 215, 216, 217, 218, 219, 220, 275
Melissa von Borstel	306
Connie Wall	34
Jon Wallace	62
Jim and Sharon Walling	BK
Damon Webster	291
Jill Webster	290
Dave Weston	2

First and Last Name, Organization (if provided)	Comment ID
Alyssa Wheeler	292, 320
Stephen Wille	M, AA
Holly Williams	234
Kenneth Williams	241
Rose and Terry Williams	BB
Diane Wills	98, AH
Adam Wilson	249
Catherine Wilson	112, 113
Douglas Wilson	BD
Janet Wilson	42
Erika Wolfe	133, 231
Blake Wollam	316
Frank Woodbery	AI
Chen Yu Xu	307
Ivan Yanyk	318, 319
A Yuzuriha	324
E Yuzuriha	323
Todd Yuzuriha	325
John Zimmerman	258
John & Carla Zimmerman	212
Tenzin Zingkha	222
Ryan Zygar	177

DEIS Comments and Responses

Table 2. DEIS Comments and Responses

ID	Full comment	Response
1	The proposal in alternative 2 seems like the best choice thinking about long term growth of downtown and ensuring higher density housing near existing transit lines.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
2	The City is missing out on a huge opportunity in the Royal Oaks neighborhood. Zoning the golf course and underutilized residential surrounding it low density is a mistake. The site will have access to Fourth Plain, which has been a focus for commercial, affordable housing, and transit. At a minimum there should be a strip of commercial or MX along 4th plain. Better would be to rezone the area Medium Density, as the golf course and existing lots are prime for redevelopment and infill. It makes no sense why you would zone Green Meadows golf course and surrounding residential Medium when the majority of the existing lots are smaller than the Royal Oaks area and the access/transit is less enticing to development.	Comment noted. The Preferred Alternative proposes zoning the Royal Oaks Golf Course property as Medium-Scale Neighborhood and adjacent parcels along NE Fourth Plain Boulevard as Mixed-Use Neighborhood, which is different from the lower-density approach originally proposed in Alternatives 1 and 2. Refer to the Preferred Alternative interactive map on the Our Vancouver 2045 website for more details.
3	"This message comments on the city's proposals to mix low- and medium-intensity zones within a single block. Absent a compelling reason, such as a unique geographic feature, all properties within a block should be low-intensity or medium-intensity, but not a mixture of both. The following block serves as an example: The block in the South Cliff Neighborhood that is bounded by Umatilla Way, Oswego Drive, Manzanita Way, and Oregon Drive. Alternative 1 would zone the parcel at the corner of Manzanita and Oregon as medium-intensity; the remainder of the block would be low-intensity. Alternative 2 would zone the parcels along Oregon Drive and Umatilla Way as medium-intensity; a minority of lots on the block would be low-intensity. Our experience from other jurisdictions has been that mixing intensity zones in a block creates unfairness, especially for property owners whose parcels are not zoned to the higher intensity. In our experience, residents of a low-intensity area prefer that low intensity to a higher intensity. If a parcel on the same block develops into a medium-intensity use, residents of low intensity parcels are likely to enjoy their parcels less than if the higher-intensity use had not developed. The owners of the low-intensity parcels, however, do not have the ability to develop their parcels the same way or to sell their parcels for higher intensity development. The owners, therefore, lack the economic benefit accorded neighbors who can develop their parcels or sell their more developable parcels for higher sums. The low-intensity owners also suffer potential financial detriment by having a smaller pool of potential purchasers for their low-intensity parcels because, in our experience, people who enjoy low-intensity prefer a block that is entirely low-intensity to a block that is of mixed low- and medium-intensity."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. In developing the Preferred Alternative, the City considered land uses near and within particular blocks, along with implications for efficient long-term future growth. Similar to Alternative 2, the Preferred Alternative proposes Medium-Scale Neighborhood zoning for the eastern half of the block bounded by Umatilla Way, Oswego Drive, Manzanita Way, and Oregon Drive, primarily to allow more long-term housing near key public facilities, in this case the abutting South Cliff Park located across the street. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
4	I would like to see more density and mixed use development in downtown and along the Fourth Plain and Mill Plain corridors.	Comment noted. The Preferred Alternative designates downtown and areas along Fourth Plain and Mill Plain primarily as a mix of Regional Activity Center and Mixed-Use Neighborhood, which allow for more density and mixed-use development. Refer to the Preferred Alternative interactive map on the Comprehensive Plan page on the City's website for more details.
5	I want to avoid Vancouver becoming another Portland with tall residential buildings and rentals more than ownership. With no clear identification for the city from any other city. Want to keep the small business feel more than a corporate feel. Have plenty of outdoor green spaces with high regard to saving our climate.	Comment noted. Some increases in allowed residential building heights are needed to accommodate state-mandated housing growth targets. Under the Preferred Alternative, most of the City's residential areas would be zoned as Low-Scale Neighborhood or Medium-Scale Neighborhood, which allows building heights of up to 75 feet (about 5 stories). The amount of land area zoned for parks and natural areas would be the same for all alternatives considered.

ID	Full comment	Response
		Refer to the Housing section of Final EIS Chapter 3 for a discussion of the potential effects of the Comprehensive Plan Update alternatives on housing diversity and supply, as well as proposed Comprehensive Plan policies to address impacts to housing and homeownership. Refer to the Aesthetics section of Final EIS Chapter 3 for more information on the potential effects of taller building heights and proposed Comprehensive Plan policies to address these impacts.
6	I live in the Waterfront region and want to become a contributing, permanent member of the community by investing in housing. The problem is that the majority of new housing in the waterfront area is all rental creating a very transient community of people continually coming and going. Shouldn't we also be focusing on ensuring we build a stable community of families that can invest in affordable permanent housing in the Waterfront are. Right now it feels like a bonanza for realty investors making money off of the location. Thank you	Comment noted. There is an existing City requirement to include affordable housing in the adjacent Waterfront Gateway area located between existing Waterfront and City Hall. Refer to the Housing section of Final EIS Chapter 3 for a discussion of the potential effects of the Comprehensive Plan Update alternatives on housing diversity and supply, as well as proposed Comprehensive Plan policies to address impacts to housing and homeownership.
7	"I am fully in support of Alternative 2 (Plan B), as it seems best-suited to address the climate, housing, health, and social crisis facing our city. With regards to land-use in the plan, I support the fewer zoning district types provided in alternatives one and two, as I believe that simplifying the number of building codes construction companies need to deal with will help to cut the red tape currently associated with housing construction, and expedite the process of building denser housing. I am also happy to see many of the parking-lot heavy land-use areas, characterized by large box stores which damage our community, being re-zoned into RAC or mixed-use neighborhoods. These spaces not only further car-dependence, but are a tax drain on the city and take valuable land that could otherwise be allocated to local or small businesses. While large corporations like Walmart, Costco, Target, or Fred Meyer will still have their place in Vancouver in the future, I hope (if this plan is to go into effect) that densification of these areas of our city will lead to greater abundance of choice, and lower costs of entry for entrepreneurs. Finally, while I am in support of the up-zoning of many residential neighborhoods, I feel that even in plan two, many neighborhoods remain dominated by the new low scaled neighborhood type. While not all neighborhoods can be up-zoned, I do question why neighborhoods along or near major arteries in the city, such as Vancouver Heights, Marrion, and North Garrison Heights along Mill Plain, remain low density. Unless this decision was made to calm traffic congestion near the PeaceHealth Medical Center, extending mixed-use zones along the whole of major arteries like Mill Plain Boulevard would better achieve divestment from car-dependence, as densification along major roads will help to justify re-apportioning the lanes on those roads for higher-throughput modes such as bikes or public transit. My biggest concern isn't with the land-use map, but with the specifics of each zoning district. While specific policies were outlined in the April 7th/8th meetings, communication from the city about specific legislation that will be used to achieve policy goals remains poor in my experience. Many cities that have tried to re-zone to facilitate more housing construction have failed. While the city goal to eliminate parking minimums is a good start, I am skeptical of how that will be implemented. If parking minimums remain for many potential developments in mixed-use spaces and residential neighborhoods, development costs associated with more plots per lot may incentivize developers to continue building space-inefficient developments. Other specific issues I have not seen addressed at all. The double egress law common in almost all US cities is damaging to housing supply goals, as two staircases demand more floor space, developers need bigger lots, bigger apartment buildings, and bigger parking lots, in order to make development profitable. Reforming the double egress law to allow for egresses other than stairwells, like in cities like Seattle, New York City, and Honolulu, will help achieve greater competition between developers, a denser city overall (both of which will help drive down rent prices), and promote the creation of smaller apartment buildings which integrate more seamlessly into the facade of neighborhoods, and therefore will receive less public backlash, expediting construction speeds. Additionally, while WA HB 1110 could serve to create more housing in the city, plenty of states like California (with their SB-9 bill) have tried the same and have not seen new construction come to light (sb-9 had little to no affect on housing supply in CA, according to a report by David Garcia and Muhammad Alameldin published Jan. 18 2023 by UC Berkley). What policies will the city have to address restrictions like lot size maximums, setback laws, and lot coverage restrictions that disproportionately discriminate against missing middle housing? And will steps be taken to make developing middle housing more financially viable than single-family houses, either by cutting development costs, or subsidizing those developments through more space-inefficient developments? Much of the success of these policies depends on regulations protecting citizens while not making	Comment noted. The Preferred Alternative, like Alternatives 1 and 2, proposes to rename and simplify the existing Comprehensive Plan land use designations and associated zoning code. Refer to Chapter 2 of the Final EIS for a description of the alternatives studied and a summary of the proposed zoning code allowances, including heights, density, and typical building types. The proposed zoning code update would allow commercial uses in all residential zones, including Low-Scale Neighborhood and Medium-Scale Neighborhood. Refer to the Our Vancouver 2045 website for more details about the proposed Comprehensive Plan and code updates that address parking minimums, egress laws, lot size maximums, setback, and coverage restrictions..

ID	Full comment	Response
	home-ownership out-of-reach. Attention on this has spiked due to the book ""Abundance"" by Klein/Thompson as of recently, but communication seems to be focused on adding goals and policies (112 from that April meeting, infact!). What steps will the city take to tear down hurdles for developers? Will environmental protections, employment quotas, and a host of other regulations be reformed to still meet these honorable goals, while allowing for more construction to occur? Finally, another important specification that hasn't been communicated well is how mixed-use each of the new zoning districts will be. Will mixed-use be constricted to just the ""mixed-use neighborhoods"", or will commercial developments be allowed (to a lesser extent) even in low- and medium-scale neighborhoods? Mode share diversification into biking and walking is heavily dependent on everyday trips being safe (which the city has failed in through thin, un-protected bike lanes and sidewalks), and short. In 2045, will low-density neighborhoods have corner stores, or a cafe every few blocks? Will a family in one of those neighborhoods be able to start a daycare, or build a family owned business in their front yard, without heavy government oversight, heavy development restrictions/costs, and overbearing public comment periods? Those to me are indicators that mixed-use policies were a success for all residents."	
8	"I live near 136th and Mill Plain. I have enjoyed this as a walkable neighborhood: being able to access retail options on foot or by bus. Now I am very disappointed with the City. The interactive map (for several alternatives) shows a very large red area (where the former airport landing was). This could have been a locale for local retailers, or a quaint development with trees and walking areas. Instead, valuable real estate is being paved over with 5 car dealerships. Lots of cement. More cars. Less walkable. More industrial than residential. Certain to be hotter and more congested. Previously I applauded the City for its walkable neighborhood concept. Now that seems like a sham. And when I contacted a City Planning associate -- by name--I received an automated reply. Vancouver's notion of a walkable city has just been canceled out by promoting multiple car dealerships: and expensive cars that I usually do not see on our streets. I usually participate in City events, but I now feel betrayed by false promises. If this is an environmental analysis, then it removes an open grassy area (airport landing) and replaces it with cement. It discourages walking and promotes automobiles. There will be more pollution. The Lexus dealership construction already obscures the view of trees and distant mountains. There have been two LTEs and an editorial regarding these changes. P.S. Having reviewed several EIS's over the years, I feel this format is not useful."	Comment noted. Refer to Common Response #3, Car Dealerships.
9	I live near Fourth Plain and Harney. I'm against Alternative #2 because there's no way that stretch of Fourth Plain can handle mixed use without huge upgrades to parking and infrastructure. No Action and Alternative #1 allow for some commercial activities, which I'm for. However, #2 screams. parking and traffic nightmare overflowing into residential neighborhoods and I see no plan to address those added variables.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #4 for more information about vehicle traffic impacts and Common Response #6 for more information about vehicle parking impacts.
10	"I strongly prefer Alternative 2. I am not very familiar with the east side of town, but live in the west side. Alternative 2 provides for more density, especially along arterial corridors. This is better for the overall environmental impact by reducing GHG emissions. My neighborhood (NW neighborhood) can benefit from increasing density along 39th Street, upper Main St. and within the current single family zone. It also makes it easier to maintain and improve our local streams and Vancouver Lake. I would, however, like to see better buffering between the industrial uses in Fruit Valley and the Lake and conservation areas. Also Burnt Bridge Creek is currently polluted and adds polluted and warm water to the Lake. The entire length of the creek needs improvement to the watershed so that there is clean and adequate flow all year. If we can improve density, maybe we can increase use of public transportation.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative, similar to Alternative 2, includes higher density zoning along 39th Street and Main Street. Regulation of small electric vehicles is outside the scope of the EIS and the Comprehensive Plan. The comment has been shared with city decision makers.

ID	Full comment	Response
	The City and State also need to better define and regulate small electric vehicle use, i.e., scooters, electric bikes, etc. It is not clear whether they may use bike lanes or must stay out of bike lanes, causing confusion and potential accidents. As more electric alternatives become used, clarity of how and where they can go will improve their adoption, reducing passenger car use. Finally, once again I encourage the City to work with Ctran to create frequent free electric trams circulating from the waterfront to at least Fourth Plain, tied together with free or low cost parking or park and ride structures near freeway exits."	City staff work closely with C-TRAN on transportation improvements. The comment about trams has been shared with city decision makers.
11	*Incomplete form, no comment received*	*N/A*
12	I'm concerned that with both Alternative plans 1 and 2, include a great deal of industrial growth and increase in large scale housing, creating denser areas of Vancouver. Both of these plans take away more natural areas and undeveloped areas of green space.	All of the alternatives, including the Preferred Alternative, maintain the same percentage of citywide land zoned for Heavy Industrial. The Preferred Alternative proposes less land zoned for Industrial/Employment than the No Action and Alternative 1, and a similar amount compared to Alternative 2. Some increases in allowed residential density and building scale are needed to accommodate state-mandated housing growth targets. Under the Preferred Alternative, most of the City's residential areas would be zoned as Low-Scale Neighborhood or Medium-Scale Neighborhood, which allows building heights of up to 75 feet (about 5 stories). The amount of land area zoned for parks and natural areas would be the same for all alternatives considered.
13	"protect and respect history -eliminate overhead lines and poles, put it all underground -don't build homes near freeways, it exposes people to too many poisonous fumes and noise -build an elevated trolley/train line like SoundTransit LINK in Seattle, with free parking at stations -provide safe neighborhood parks and common areas with trees and fences **Hazel Dell: get rid of all the bikini coffee carts and massage shops! They are disgusting, have inhumane working conditions, are dangerous for the women and girls. Help avoid human trafficking! Frequented mostly B18 creepy men who could make their coffee at home or go to a reputable coffee house instead of leering at barely dressed girls, alone in a box, in all kinds of weather. Make Vancouver more civilized! This is shameful and embarrassing to have these places in our community! **No fireworks!"	Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Refer to the following sections in Final EIS Chapter 3 and 4 for more information about some of the topics in this comment: Historic and Cultural Preservation, Noise, and Air Quality, Greenhouse Gas Emissions, and Climate.
14	If I'm still here in 2045, I'd like to see a Vancouver with senior support groups. It's a very lonely place when the people you know have died.	Comment noted. Refer to the Our Vancouver 2045 website for more details about the proposed Comprehensive Plan update, including the goals and policies included in the Comprehensive Plan Community Experience chapter.
15	Please don't make Orchards too industrial. Orchards needs better walkability and local shops, NOT warehouses and industrial buildings. I hope the plans bring more culture and lifeto NE Vancouver!	Your comment was considered but it was not applicable to the EIS analysis because Orchards is outside of the City limits and therefore not included in this Comprehensive Plan Update.
16	We need a wide variety of housing. Are efforts are delivering more apartments. We need to be delivering more middle housing products and giving folks the opportunity to own their home. Overall I think the City has the same goal.	Comment noted. Refer to Chapter 2 and Chapter 3 of the Final EIS for more information about proposed housing types in the Comprehensive Plan alternatives. The Preferred Alternative allows for more housing and for housing of different types and sizes, including middle housing, in more areas of the city.
17	"Hello, I wanted to send in a comment for the subject property at [address] Vancouver, WA 98683, which shows it will be in the Low Scale Neighborhood for Alternative 1 and Alternative 2. The subject property is 19,457 sq. ft. or 0.45 acres (per Clark GIS).	The Preferred Alternative zones this property as Low Scale Neighborhood. Refer to the Our Vancouver 2045 website for more details about the draft zoning code, including allowable units and building heights. The zoning code will be finalized and adopted with the updated Comprehensive Plan.

ID	Full comment	Response
	Both Alternative 1 and Alternative 2 appear to designate the subject property as Low Scale Neighborhood, allowing for up to 6 units per parcel, 3 stories, and a 45-foot height limit. Do you know how I can tell how many actual units I can build and what the limitations are? In the No Change scenario, my property is shown as R-9, whereas the properties to the north and east are marked as R-18. Can the subject property show as R-18 on the No Change scenario? Best regards, Denny Le"	
18	I strongly support alternative two, given the community need for ample and affordable housing in the coming decades.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
19	"Reading the housing I wondered if this includes the homeless population and the plan to get them into housing. Are they included in the 199,??? or the 81,???? I noticed that you included unincorporated Vancouver in some of the future designs. Is that also part of the 199,000 that you had quoted. I am also wondering about if sidewalks would be put in, in those areas that do not have them right now? Some roads there are barely wide enough for two cars, it is hard to think about sidewalks in those areas, at the same time it would make people who are walking feel safer. Being a visually impaired walker that is a concern for me. My third thing is, I know that you don't have control of C-Tran, will they be expanding any services with more population? I noticed under the transportation you had listed that people drive a lot in the 4 miles of their homes. I have to say that the grocery store, for me is a mile a way. The pharmacy is also 3/4 of a mile away. Taking the bus to the pharmacy can be just one bus ride way. But the grocery store, is two buses, or walk half a mile, then take the bus the other half mile. There is not always room to have a folding shopping cart full of groceries, depending on other passengers and disabilities too. I have to say that half mile to the bus stops is not always the best sidewalks, and I then to walk in the street, less bumps, to get my cane stuck on or trip over."	Population data in the EIS comes from the U.S. Census Bureau American Community Survey (ACS) and includes the incorporated City of Vancouver limits only. ACS includes some people experiencing homelessness but is not considered a complete count. Refer to the Housing section of Final EIS Chapter 3 for a discussion of the potential effects of the Comprehensive Plan Update alternatives on housing diversity and supply, as well as proposed Comprehensive Plan policies to address impacts to housing and homeownership. Refer to the Our Vancouver 2045 website for the Comprehensive Plan Housing chapter, which includes goals and policies to address homelessness. The Transportation System Plan (as adopted by the Comprehensive Plan) includes a goal to fill sidewalk gaps. The City coordinates with C-TRAN on a variety of topics, including long-range planning.
20	"I have comments about the new interstate 5 bridge project: Potential approaches to making the I-5 bridge project both cheaper and more cost-effective involve a combination of strategic planning, innovative design, efficient execution, and robust financial management. Here's a breakdown of strategies that can contribute to this goal 1. Value engineering and design optimization Focus on Essential Functions: Thoroughly analyze project requirements to distinguish essential functions from desirable but non-critical features that could be simplified or eliminated. Explore Alternative Materials & Methods: Evaluate various material choices and construction techniques, considering their long-term performance, durability, and life-cycle costs, not just upfront expenses. Embrace Sustainable Materials: Choosing sustainable materials can lead to cost reductions by aligning with green building trends, potentially offering energy efficiency, waste reduction, and enhanced longevity. 2. Optimized planning and procurement Accurate Cost Estimation: Invest in detailed and reliable cost estimations during the planning phase to avoid surprises and allow for better budgeting.	Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Refer to the Interstate Bridge Program website for more information about how to comment on that project.

ID	Full comment	Response
	Competitive Bidding: Utilize competitive bidding processes to obtain the best prices for materials, equipment, and services from various contractors and suppliers. Bulk Purchasing: Negotiate volume discounts by buying materials in bulk for the entire project, considering storage capabilities and timelines. Strategic Partnerships: Building long-term relationships with reliable suppliers and subcontractors can lead to discounts and consistent supply. 3. Efficient project management and execution Thorough Project Planning: Develop a detailed plan that outlines the project scope, timelines, and deliverables to avoid delays and control costs. Implement Lean Construction Practices: Analyze workflows, eliminate inefficiencies, minimize waste, and optimize resource utilization through lean principles. Leverage Technology: Utilize construction software, Building Information Modeling (BIM), and smart construction equipment to streamline processes, improve accuracy, and potentially reduce labor costs. Prioritize Safety: Investing in safety protocols and equipment can prevent costly accidents, delays, and penalties. Effective Site Monitoring: Diligent site oversight by the principal contractor and adopting an agile construction management approach can minimize expensive rework and increase work rates. 4. Financial management and funding Life Cycle Cost Analysis (LCCA): Evaluate alternatives based on their total cost over their useful life, including planning, construction, operation, maintenance, and disposal. This helps identify options that may have higher upfront costs but lower long-term expenses. Consider Public-Private Partnerships (PPPs): Explore collaborations with private companies to share the financial burden and leverage their expertise and efficiency. PPPs can involve various financing models where the private partner may fund, design, build, and operate the project, recovering their costs over time through user fees or government payments, Optimize Funding Strategies: Explore innovative financing options like federal programs (e.g., TIFIA, GARVEEs), and value capture mechanisms. By implementing these strategies, the I-5 bridge project can potentially achieve both cost reductions and greater cost-effectiveness, delivering a functional and sustainable solution while making the best use of resources. This is my humble opinions. Thank you."	
21	*Incomplete form, no comment received*	*N/A*
22	I am disgusted with the amount of trash and waste that is on city streets. The homeless elements should be required to show more respect for the environment, visually and physically. Also, I understand your need to raise revenue, but I'm disappointed that I cannot conveniently drive to the outdoor market and spend money on items there. Now, everything is pay to park. It reminds me of the Portland crisis.	Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Vancouver's Litter Stewards program includes more than 120 volunteers who help pick up trash across Vancouver. Share's Talkin' Trash program, with funding and coordination support of the City, picks up roughly 20 tons of trash each month. City staff also pick up a significant amount of solid waste from streets, parks and pathways each month. As part of ongoing cleanups, City crews removed more than 283 tons of waste between January and November last year. The City's Solid Waste team collaborates with Waste Connections, Clark County and other cities in the area to improve services. Code enforcement officers regularly pursue cases related to illegal dumping or a failure to properly dispose of garbage. The State's Department Transportation are responsible for state highways, including on and off ramps, and they partner with the Department of Ecology to remove litter.

ID	Full comment	Response
		Large amounts of garbage in a public park or garbage blocking a street or sidewalk can also be reported using the Public Works Service Request form at: https://www.cityofvancouver.us/servicerequest Refer to Common Response #15 Homelessness for more information on how the City is working to address homelessness. The Transportation section in Chapter 3 of the Final EIS includes information about parking and recommends strategic pricing mechanisms to regulate the availability of on-street parking in Mixed-Use and Regional Activity Centers. It also includes policies to support access to key places by walking, bicycling/small mobility, or transit. Parking management helps ensure parking is available for residents, businesses and visitors For additional questions or comments related to parking, please refer to the Parking page on the City's website.
23	I think these plans would make our city a much better place to live in. I liked alternative two since it overall allows for the most density and more mixed use areas. I just think the area around the Amtrak station should be if possible, fully integrated with downtown Vancouver. Right now that area is surrounding by industrial buildings and is generally not appealing to go to. The lack of transit options is also an issue. A bus line, or better yet, some kind of light rail or streetcar (maybe work with TriMet to have a second MAX line run through there?) to connect the station to the rest of downtown would do wonders. But overall, I was concerned with the new designation for the residential areas. Would it not be possible to allow for some mixed use in these areas as well? People could open businesses in their garage, or have stores on every corner. While this plan definitely blurs the lines between uses somewhat, I feel like the main issue of exclusive residential zoning being the default is still present. I feel like both business and neighborhoods would benefit if it was possible to open say, small shops and restaurants in residential areas. It would also help to lessen the need to drive, since now there could be for example, a mini mart, only a quarter mile away.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Similar to Alternative 2, the Preferred Alternative would increase density across Vancouver and allow for mixing of residential and commercial uses in more areas. The Low- and Medium-Scale Neighborhood zoning districts would also allow for some commercial uses.
24	*Incomplete form, no comment received*	*N/A*
25	I would like to encourage development along the lines of Alternative 2. I feel the only way forward is a densified City of Vancouver, that is highly livable (prefer mixed use over straight industrial) and commutable without driving, while allowing for a maximum of natural spaces for climate mitigation, food security and last but not least quality of life. I would also like to urge the City to incorporate/change policy of building permits to no longer allow huge parking lots (think multi storey, underground, or at at the very least covered by solar panels) with new developments. Another factor that needs to be written into policy is the inclusion of small natural and planted spaces into multi family or multi use developments, again to maintain quality of life while we start living in more proximity of each other.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Similar to Alternative 2, the Preferred Alternative would increase density across Vancouver and allow for mixing of residential and commercial uses in more areas. Refer to Common Response #6 for more information about changes to parking minimums proposed with the Comprehensive Plan and code updates. Refer to the Our Vancouver 2045 website for the Comprehensive Plan Parks and Recreation chapter, which has more information on goals and policies addressing parks and open space.
26	*Incomplete form, no comment received*	*N/A*
27	"I would like to strongly advocate for sidewalks along NW Lincoln Ave in the Northwest neighborhood to improve connectivity, increase access to the bus, increase safety, and reduce the need to drive. Currently there are very few areas along NW Lincoln that contain sidewalks, however the entire road is a c-tran bus line. Without sidewalks, it makes it difficult for people with mobility aids to access the bus stops- they are often in the grass. It also feels very unsafe to walk along this road because you are in the almost non-existent shoulder. I really think this area should be prioritized for complete streets or funding for sidewalk completion. I also fully support any zoning that would welcome local businesses in our neighborhood. I realize with the way the neighborhood is currently built, this might not be possible, but even increased possible local businesses that can be walked to in Lincoln (which looks like a possibility in the alternatives) in addition to more sidewalks in our neighborhood would help to reduce car trips! I have previously lived in the Woodlawn neighborhood in Portland and	Comment noted. The Transportation section of Final EIS Chapter 3 identifies proposed measures that support street standards and infrastructure for pedestrians, such as sidewalks. Your specific comment has been shared with City decision-makers. Refer to Common Response #7 for more information about sidewalks. The Preferred Alternative designates the Lincoln and Northwest neighborhoods primarily Low-scale Neighborhood and Medium-Scale Neighborhood, with some areas along key corridors as Mixed-use Neighborhood. These zoning designations allow both housing and business uses, including cafes, salons, professional services, and restaurants. The Land and Shoreline Use section of Final EIS Chapter 3 identifies proposed measures that support small and emerging businesses. The Transportation section of Final EIS Chapter 3 identifies proposed measures that support walking, cycling, and taking transit.

ID	Full comment	Response
	being able to walk to a corner store with some staples but also serves food like a bottega, a yoga studio, coffee shop, my acupuncturist, multiple restaurants, and a park was so lovely! I moved to the west side of Vancouver because I wanted to be able to walk/bike/bus more, but I am still finding it difficult."	
28	"I would love to see real public transportation from Uptown to the waterfront and back. Not just an occasional bus that doesn't really connect! It would eliminate the parking hassle and current hatred of downtown and council members. A trolly? A weekend system? RYD has the model in place- just expand. W don't need to follow Portland- we can be an original. Look into other major cites and Circuit or Freebee or FRED etc!!! This is so needed and NOW!! As for plants and trees... more green space. Stop building on the waterfront. On a hot day it's like being an ant under a magnifying glass- hotter than hell!! We need more trees there like Esther Short has. Remember Esther Shirt park? The place that used to be our living room and millions of dollars were spent to renovate it only to have Mayor A move everyone to the magnifying glass area!!!! Our downtown needs only to look at the success of Walla Walla or Camas to see how fantastic we could be!!"	Comment noted. The Transportation section of Final EIS Chapter 3 identifies proposed measures that support improvements to transit connections to key areas of the city. The Air Quality, Greenhouse Gases, and Climate and Plants and Animals sections of Final EIS Chapter 4 also identifies measures to mitigate the impacts of climate change, including extreme heat, and measures that support the protection of tree canopy. The amount of land area zoned for parks and natural areas would be the same for all alternatives considered.
29	"I wasn't able to use the Alternatives maps because of what seemed like a technical issue. Mostly I just want to say that I hope that as few of the older buildings in the downtown area as possible - what's left - get torn down and replaced with boxy high rises. The buildings with the beautiful brickwork should stay. We do need affordable housing but I'm not sure that all those new apartments are affordable to most renters. While making the city more affordable to live and get around in, I hope the plan also includes making / keeping it pleasant - green spaces, trees, some sense of pleasing design about anything new being built. I live in Hough, and while I know we need multiple-unit housing, I wish the new ones weren't so ugly. Also, in residential neighborhoods of any kind there should be some sort of code regarding yards that discourages removing everything green and replacing it with concrete; it really detracts from the liveability."	We are sorry to hear about the technical issues you experienced. For further assistance, please reach out to OurVancouver2045@cityofvancouver.us. Comment noted. The Aesthetics and Historic and Cultural Preservation sections of Final EIS Chapter 3 identify measures intended to protect historic and architecturally significant structures and ensure compliance with citywide standards for landscaping and tree conservation. The Water and Plants and Animals sections of Final EIS Chapter 4 also identify measures that support green space, trees, and limiting new impervious areas.
30	"PLEASE PLEASE PLEASE put the vehicle lanes back how they were. It takes three times as long as it used to in order for us to get to work with only having one lane. The bus only lanes are a total failed experiment. The commuters that use and pay for these lanes through car tabs, and gas taxes need them. The other problem is the fancy homeless camps using the new extra wide bike lanes to make their homes.... THANKS FOR THAT... The other problem is the roundabouts. No one was ever trained on how to properly use them. They've already caused multiple rear ender and sideswipe accidents due to people either stopping all together until they feel ""safe"" enough to proceed. Or they try to rush in front of other cars to get one spot ahead and then sideswipe vehicles. Yes my trucks been hit in one by a person not even rushing and not seeing me.. and hitting the rear quarter panel and rear bumper. Its a total joke how these were installed.. THE last thing is WE DONT WANT PORTLANDS CRIME RIDDEN MAX TRAINS HERE.... I have 4 relatives that drive them and they all agree the max is nothing more than a way for homeless, druggies, thieves etc to get away from PORTLAND...."	The Transportation section of Final EIS Chapter 3 addresses potential impacts of the alternatives on traffic and transportation, as well as proposed mitigation measures to offset potential impacts. Refer to Common Response #4 about vehicle traffic impacts. Your comment about the MAX line was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Refer to the Interstate Bridge Program website for more information about how to comment on that project. Refer to Common Response #15 Homelessness for more information on how the City is working to address homelessness.
31	10000 NW Lower River Road - This historically has had a house and believe it was recently purchased. They will want to put a house on it again and will need to give them some reasonable use. Should consider these situations in the Natural zone.	Comment noted. The Preferred Alternative designates this property as Low-Scale Neighborhood in order to reduce non-conformities and support housing production.
32	"I would like the integrity of our FISHERS LANDING single family home neighborhood maintained. Most homes in the neighborhood were built in the 1980s. I think there is value in maintaining these historic communities. These homes are valuable and well maintained. The community works together in a neighborhood association to keep it aesthetically pleasing.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.

ID	Full comment	Response
	The proposed plans would expose my home to significantly more noise, pollution and traffic. I understand growth in the city, but can see other opportunities for expansion. What impact will the VIC on SE34 th have on density? It would seem that development of commercial and multi family housing could satisfy the growth needs. I'm hoping you will reconsider disturbing this fine, historic neighborhood."	Some increases in allowed residential density and building scale are needed to accommodate state-mandated housing growth targets. The Preferred Alternative would zone the Village at Fisher's Landing as a mix of Medium-Scale Neighborhood, Low-Scale Neighborhood, and Manufactured Home zoning. Refer to Common Response #2, General Growth and Quality of Life Concerns, for more information about how growth is being distributed throughout the city. The Historic and Cultural Preservation section of Final EIS Chapter 3 acknowledges the potential for disturbance of individual sites and associated impacts to historic resources and provides mitigation measures designed to offset these impacts. The Noise section of Final EIS Chapter 3 provides more information about the high-level noise analysis for the alternatives. No substantial increases in noise are expected to occur under the alternatives; therefore, no mitigation measures are proposed. All environmental noise would continue to be regulated by WAC 173-60 and VMC 20.935. The Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 indicates that there would be lower modeled air pollutant emissions than existing conditions under all of the alternatives under consideration. Refer to Common Response #4 for more information about vehicle traffic impacts.
33	to enjoy peace and quiet in our homes, sidewalks and yards in Village at Fisher's Landing neighborhood, I want express my strong support for maintaining the existing sound wall between neighborhood and the 164th Ave arterial. This wall is a vital component of our neighborhood's character and plays a crucial role in preserving our quality of life. As you know, the S.E. 164th Ave arterial is a major thoroughfare, experiencing significant traffic volume, especially during peak hours. This results in substantial noise pollution that directly impacts residents living adjacent to the roadway. The sound wall acts as a critical barrier, mitigating this noise.	Comment noted. The Noise section of Final EIS Chapter 3 provides more information about the high-level noise analysis for the alternatives. No substantial increases in noise are expected to occur under the alternatives; therefore, no mitigation measures are proposed. All environmental noise would continue to be regulated by WAC 173-60 and VMC 20.935. In areas where development is planned near existing or future sources of higher noise levels, the City may consider whether to require implementation of noise reduction methods such as locating noise-sensitive areas further from noise sources, including walls or other barriers to shield noise from noise-sensitive use locations; and designing interior spaces with noise-reducing building materials. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
34	"I'd like to see the increased housing slowed down while infrastructure to support that increase is beefed up. This region is growing way to fast. There is no visible evidence the increased revenue from increased housing is supporting infrastructure to handle the influx of people. We don't see roads being widened to handle the traffic. Only corner curb replacement, which is ridiculous. This county is becoming unbearable to live in. The roads can't handle the traffic which is getting worse by the month."	Comment noted. The Transportation and Public Services and Utilities sections of Final EIS Chapter 3 provide information about the potential impacts of the alternatives and their proposed growth in housing units, as well as potential mitigation measures, including large capital transportation improvement projects, to offset these impacts. Refer to Common Response #4 for more information about vehicle traffic impacts.
35	I would like to see more mixed use development in the streets along Main St downtown, specifically in the Hough and Arnada neighborhoods. Like possibly an even more extreme version of alternative 1. The transportation related to alternative 1 as well is personally appealing to me, and some of the additional total city miles driven could be offset by adding high density housing along transit lines, as planned. Additionally residents along transit lines could receive an unlimited 1-2 month C-Tran pass to try it out after moving into those spots. On the higher density / additional housing note, as noted in the plan, updated city regulations are necessary for protecting plants, animals, and water runoff. While downtown has done a great job of emphasizing natural areas and art on the required man-made components (ex manhole covers), this perspective can and should be shifted around Vancouver, not just east as we are currently seeing but also north. One example of this is the city holding submissions for individuals to submit art for manhole covers, and while the budget may not allow artists to be paid for this, they can be posted on local Vancouver government pages for exposure and have the materials provided. Citizens could vote on art submissions from the competition as well, for another civic engagement angle. Things are not quite that simple in reality of course, but its one example.	Comment noted. The Preferred Alternative would designate the streets along main Street downtown Mixed-Use Neighborhood and Regional Activity Center. The Hough and Arnada neighborhoods would be zoned as Medium-Scale Neighborhood, which allows for both residential and commercial uses. The Transportation section of Final EIS Chapter 3 identifies proposed measures that support improvements to transit connections to key areas of the city. The Plants and Animals section of Final EIS Chapter 4 notes that all alternatives would be subject to the City's December 2024 Critical Areas Ordinance update, which provides additional protections for plant and animal habitat. Refer to the Our Vancouver 2045 website for the Community Experience chapter of the Comprehensive Plan, which provides more details on public art.
36	It has come to our attention that the EIS the City published for its new 20 year comprehensive plan reclassifies the northern row of houses in Southcliff along Mill Plain is proposed for Mixed Use (Commercial). If so, we have been	Comment noted. The Preferred Alternative would zone the properties on Mill Plain Boulevard in the Southcliff neighborhood as Medium-Scale Neighborhood. The zoning code update may create legally nonconforming

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	informed by an expert that if this alternative is adopted for the comp plan it would make all of those homes nonconforming uses per Vancouver Municipal Code 20.920. This is unacceptable for a neighborhood of the cultural and historic, as well as highly tree-rich nature of Southcliff. We already have the new development in the former Town Mall. We plan to inform neighbors especially those homeowners to respond.	properties due to changes in zoning districts and development standards. The proposed zoning code allows legally established nonconforming structures and uses to continue and expand. Routine repairs and maintenance for nonconforming structures are permitted, including any work required by the Building Official or Fire Marshal. If a nonconforming structure is damaged by a catastrophic event, proposed regulations will still allow it to be rebuilt within its original footprint (note that single family homes in the Medium Scale neighborhoods can be replaced within three years without meeting minimum density standards and do not have to be in the original footprint). The draft proposed code aims to provide clearer, more accommodating standards for how these properties can be maintained, rebuilt, or expanded. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
37	*Incomplete form, no comment received*	*N/A*
38	"I don't want ""high density housing"". I want better transportation corridors, especially about 3rd and 4th bridge over the Columbia River. I don't want Portland's bankrupt TriMet and their light rail in Clark County. I want lower taxes to make Vancouver affordable for everyone, not just the wealthy in the Waterfront Condos. Shrink the city bureaucracy."	Comment noted. Your comment was reviewed and reflects a policy preference rather than input on the sufficiency of the environmental review. No further response is warranted.
39	"I live on NE 109th AVE, 98682. My street is a nightmare, in large part, due to the city and the plans and zoning they have allowed, against the Counties advice, since we were annexed many years ago. We lost all rights and protections, as our tiny condo community was dwarfed by what was supposed to be additional condos, until the city approved less parking, smaller units, and added 25 more. This began a years long war with the apartments. While we were able to tow cars within the property, we had to learn live with the endless cars up and down the road. It had become much better until the company across from us moved in several years ago. Now , what was once a quiet residential tiny two lane road, is engulfed with semi trucks. They make their employees park in the street, adding to the congestion, and replaced it with an never ending parade of semi trucks that do not fit. Since they do not fit, they block 109th40 times a day, drive up on the sidewalk, destroying it, hit my fence, as they jockey into postion. They are three feet from my window. If I am outside, make that three inches. This is not a way for a human to live, and seeing you plan to create more of this situation, I wanted to take a moment to tell you, it doesn't work. it is not going to work. It was not going to work when they created the UGP using a formula that was untested, and decided it must be correct....it wasn't. I am proof of this type of housing failing. I am told to move, call my landlord, that my home is too close to the road and needs to be demolished, call the city, no call the county, no, call VPD. I can't move, I lost my income. I own this, I AM the landlord. If my home is too close to the road to be safe, then ....shouldn't we address it? But VPD will not even come here for traffic or parking issues, they said not to bother them. To call the city. The city says call Officer Larson, who doesn't even know where Kevanna Park is. VPD told me this road is industrial and I am the one who is not supposed to be here, the semis can do whatever they want on this road. It is an endless loop that always ends with a shrug and a ""damn, that sucks"" , and the resolution is, the road belongs to the warehouses, so does the sidewalk and my backyard, apparently. Why do we have any rules if VPD is choosing to not enforce them? Why do you have it set up so we cannot call, we just end up with a recording or dead voicemail? Calling 311 for these things is a waste of their time, and they are not doing it anyway, so why assign it to them? The city could be pulling in so much money if they were ticketing the residents, and the semis. While it may not be against the law to have industrial noise and pollution filling my home, it is wrong. It is not ok. So, while I would love a resolution for my issue, after years of being ignored, and f lat out lied to, I gave up. Eventually I will give my home back to the bank, I have been unable to sell due to living in an industrial zone- my bank is in an uproar, they would have never approved me had they known it would change this way, and I am being threatened with fines if I don't make my condo compliant to their rules, and I cannot afford a 9 foot tall sound and safety wall to keep a semi from entering my home. And because of your changes to zoning and no code compliance, I do feel it falls on the city to address- especially since a wall cannot be built without a permit from the city and an assessment	Comment noted. The City recognizes that some of the issues raised in the comments about this specific location may be outside the scope of the Environmental Impact Statement (EIS). This comment response focuses on addressing comments as they relate to the EIS analysis for Vancouver's Comprehensive Plan Update. For a more comprehensive response on the issues and concerns raised, please refer to past City email correspondence. The Preferred Alternative would zone the properties along NE 109th Ave between NE Burton Road and NE 39th Street as Industrial/Employment along the east side and as Medium-Scale Neighborhood along the west side, with a small amount of Mixed-Use Neighborhood on the east side along Burton Road. This zoning allows uses similar to what is allowed currently under the properties' existing Light Industrial (IL) and Higher-density Residential (R-22) zoning. The Preferred Alternative would not expand industrially zoned areas and would retain the industrial zoning along 112th Avenue and adjacent 109th Avenue because it is a developed industrial area with access to SR 500. Citywide, the Preferred Alternative avoids downzoning properties from what they are currently to support future housing production and reduce non-conformities. Thus, the Preferred Alternative zones the properties along the west side of 109th Ave as Medium-Scale Neighborhood, which most closely aligns with the current R-22 zoning. Refer to Common Response #1 for more details about the development of the Preferred Alternative. Chapter 2 of the Final EIS provides a detailed description of the Preferred Alternative, including land use maps, and compares the major features of the Preferred Alternative to Alternatives 1 and 2. Additionally, there is an online interactive map that showed the alternatives analyzed in the Draft EIS and now shows the Preferred Alternative analyzed in the Final EIS can be found at: https://experience.arcgis.com/experience/7d801887df3a4150a9a1e46aa16fc6f6/. This is linked on the Our Vancouver webpage (https://www.beheardvancouver.org/plan2045) and PDFs of the alternatives can also be found on the site's Project Documents page (https://engage.zencity.io/beheardvancouver/en-US/projects/project-documents). Because not all areas are appropriate for mixing uses due to potential conflicts with industrial activities or residential livability, the Industrial/Employment zoning district would allow warehouse/freight movement uses but not allow new housing to be built, similar to what the current Light Industrial (IL) district allows. The Medium-Scale Neighborhood district would allow a greater mix of commercial and residential uses but would not allow warehouse/freight movement uses and many other industrial uses. Refer to Common Response #10 about businesses in residential areas. Projects submitted under the current zoning code must

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	anyways. If it is only for the industrial complex, then this is not a residential road, and we need a different way to leave the complex. But I5 is there, so what do we do? Just accept that we are the ones not welcome and give the land to the city? This is the POV of someone living in what you are building, 20 years from now. While yours are going to be mostly rentals, this also applies to all new builds in the city limits. You will create these pockets of forgotten areas that receive zero back on their tax investment into the community. And what you are building now, much like building over the creek and on top of swamp lands, is going to cause misery for the people warehoused inside. It is clear from the proposals that low income, high density housing is to be the buffer for SFH, so they can have a peaceful life. We don't even have a park we can walk to, access was walled off when the apartments went in. Nor do we have anywhere for our children to safely play. We do not have a bike lane or a safe way to walk to a bus stop, and you want everyone to use public transit? I no longer walk for exercise, I don't feel safe on this road. Food for thought. Who knows, 20 years from now, someone might read this, like I read the pleas from the county to address zoning and code issues before the annexation. It's not like the city is unaware, they simply do not care what happens to a certain demographic they see as undesirable, but needed."	follow the zoning code requirements at the time of submittal. They may opt into the future code once adopted and if their intended use is still allowed. The Transportation section of Final EIS Chapter 3 addresses potential impacts of the alternatives on traffic and freight, as well as proposed mitigation measures to offset potential impacts. Refer to Common Response #4 for more information on vehicle traffic impacts and #5 on traffic safety. The Noise section of Final EIS Chapter 3 provides more information about the high-level noise analysis for the alternatives, as well as proposed mitigation measures to offset potential impacts. The Public Services and Utilities section of Final EIS Chapter 3 provides more information on potential park impacts across the alternatives, as well as proposed mitigation measures to offset potential impacts. The Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 considers the potential impacts of the alternatives on air pollution, as well as proposed mitigation measures to offset potential impacts. The proposed Comprehensive Plan Equity and Inclusion, Parks, Recreation, and Cultural Services, Transportation, and Annexation chapters include goals and supporting policies related to how the City can support low-income households, guide intentional future annexation, improve park access, and increase transportation safety. Note that the Comprehensive Plan does *not* propose any specific annexations, and land will *not* be annexed with the adoption of this plan. Annexation processes are separate from this plan update and require a robust public process and City Council approval. Refer to the Comprehensive Plan page on the City's website for more details about the proposed Comprehensive Plan.
40	"have you given any thought to the homes two feet from this industrial complex that was built for light commercial only and cannot handle semi traffick? why would you do this to humans Parcel Number: XXXXXX XXXX NE 109TH AVE this IS NOT ENOUGH SPACE TO BE BOTH INDUSTRIAL AND RESIDENTIAL."	Please refer to the comment response to comment 39.
41	"Regarding Climate, if possible: Assign staff to apply for grants from the Climate Commitment Act to cover the marginal cost of mandates. Mandate efficiency in buildings and vehicles. Stop approving new barriers to clean energy. Require new construction to be all electric ready, solar ready, and ev ready. Work with school districts to require that if they need a permit to repair a heating system, replace the fossil fuel system with heat pumps. Consider requiring all new construction to include solar plus batteries/ Stop increasing emissions: No expansion of the fossil fuel industry, think Tristar at the Port/\. No new gas hookups. No new gasoline stations. Discourage the sale of polluting equipment and vehicles. Adopt the Independent Source Rule for trucks and warehouses. Maximize efficiency. Support the development of truck fleet charging infrastructure. Promote the development of large solar projects on warehouses, parking lots. schools, and brownfields. Support density within walking distance of places of employment, eg warehouses, hospitals, clinics, schools, shopping centers."	Comments noted. Refer to the Public Services and Utilities section of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 for a discussion of proposed Comprehensive Plan measures intended to address climate impacts, which overlap with many of your comments.

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42	Please preserve Fort Vancouver & Pierson Airfield as our cultural heritage. NO SELLING OFF OF THE LAND.	Comment noted. Fort Vancouver and Pearson Airfield are part of the Vancouver National Historic Reserve Historic District, which is a federally protected district on the National Register of Historic Places. The Historic and Cultural Preservation section of Final EIS Chapter 3 identifies measures and regulations that protect and promote Fort Vancouver and the Historic Reserve.
43	My wife and I live in the Southcliff neighborhood and our property is close to Mill Plain ([address]). We are extremely concerned about any land use changes that would allow commercial or multi family residential in front of or near our neighborhood. We strongly vote for no changes to the development plan on either side of mill plain near SouthCliff.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
44	I cannot believe that you would take a neighborhood that is as old as Southcliff and allow mixed use and businesses in its backyard. Have you lost your mind? Our properties will decrease in value well below what we paid and our quiet neighborhood will be noisy, crowded and unsafe. How dare you!	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
45	I would like to see the removal of mixed use areas along the western mill plain corridor. Specifically the areas that will negatively affect already established neighborhoods.	Comment noted. See the Preferred Alternative map for updated zones along the western Mill Plain corridor.
46	"The purpose of development is create the most affordable and efficient use of land. If this is true, then I would have you reconsider your proposed development of parcel [parcel number] (currently proposed medium scale) and parcel [parcel number] (currently proposed low scaled) to a mixed use neighborhood development. Vancouver is a growing market. Low scale neighborhood development does not solve the affordable housing problem or the homeless population problem currently in the area. Medium scale neighborhood development may allow for more affordable housing but does not make the most efficient use of the land. Mixed use neighborhoods would allow for more affordable housing as well as allowing small businesses to grow making this the best use of the land. It would also create more walkable areas thereby reducing greenhouse gas emissions through use of public transit systems and promote energy efficiency. My property also includes 9 acres of open space land (parcel [parcel number]). Since these areas can't be developed, a mixed use neighborhood development of the other 2 parcels could allow this area to be used as a community garden. Families living in the affordable mixed use neighborhood community could rent individual plots in half or all the 9 acres for growing vegetables, flowers, etc that would benefit not only the community but directly benefit small businesses in the area as transportation costs could be reduced. Another possible use for this open space would be build a solar farm. Solar farms reduce the reliance on fossil fuels lowering carbon emissions."	Comment noted. The Preferred Alternative would designate these properties as Medium-Scale Neighborhood and Low-Scale Neighborhood as there are Critical Areas across portions of these properties. The Low-Scale Neighborhood and Medium-Scale Neighborhood designations allow for mixing of residential, open space, and commercial uses and increased densities. If you have additional questions, please contact OurVancouver2045@cityofvancouver.us.
47	"Leadership of Portland and Vancouver have really let things spiral downward. When our family moved here 35 years ago, it was a wonderful community filled with caring people that was very community minded and little to no crime. It is a far cry from that now. Part of it is that Portland/Vancouver let the homeless population take over our cities/area in such a negative way.... everywhere you go there is graffiti and litter plus tents and broken down campers. It looks awful.... there is no pride in the city any more. This is not true of many other cities I visit (Denver, Little Rock, Minneapolis, Houston, Dallas, San Antonio, etc... because they don't allow it. It is primarily on the West coast (CA, OR & WA) and New York (because they've allowed people to not have any pride in their city). City officials here don't care about garbage everywhere, graffiti, broken down campers and so forth. I do have a heart for those that are homeless, but other cities manage this population much better. Portland/Vancouver have almost welcomed and encouraged the world's homeless population to camp out here because it's easy for them. There has to be ordinances to keep ""order"". When my mother was at the end of life a couple years back, I was appalled that people were camped out all over the sidewalks.... here people inside are trying to get better and their view out the window was trash and tents. I am including Portland and Vancouver because it started out big time with the riots in downtown Portland in 2020 (the mayor was down town helping them ""trash"" the city/downtown which has never been the same..... no-one wants to go down there any more and businesses moved out by the droves and it's not safe (plus businesses can't get	Comment noted. Your comment was reviewed and reflects a policy preference rather than input on the sufficiency of the environmental review. Refer to Common Response #15 Homelessness for more information on how the City is working to address homelessness.

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	insured down there either). It used to be the happening place to be and everyone loved to go there with shows, shopping and restaurants! Now Vancouver's Water Front is the ""happening place"", but so much junk has spilled over from Portland into Vancouver (along the I5 corridor) that it's nearly as bad in Vancouver. Jantzen Beach & Delta Park is an utter mess (nearly all the good restaurants left Jantzen Beach like Cracker Barrel, BJs, Stanfords, Sharis, Burrito House, etc... due to crime which is so sad). The Jantzen Beach Target has all toothpaste, deodorant and such under lock and key. You have to ask to get everything out of a case... That is so close to Vancouver.... it has already spilled out along the freeway and a matter of time before it's on the waterfront if our officials don't stop it now. In addition, the city is just ""shoving"" housing into every nook and cranny whether it makes sense or not so everything has become a ""modge-podge"" and there is not a good flow in many neighborhoods now. Likewise they ""allow"" the builders to put in ugly and cheap fencing that looks like garbage within a couple years. Check out Kennewick, WA where they have cement fences/decorative cinder blocks that last forever and don't lose their appeal in just a couple years. There is also cohesiveness (not just all sorts of random types of building). Another area that has good management is Ridgefield, WA. They put in a lot of good ordinances/codes with the builders (both residential and business) for consistency and beauty of community (they have requirements for aesthetics such as trees, putting rock on the outside of businesses for a higher end appeal and more). For instance our same home builder has to cover home decks and they have to be a certain size in Ridgefield, but in Vancouver our builder can skimp and cut corners as much as they want (do it the cheapest way and however they want & it shows). And you all never require enough parking when you build apartment buildings. I have heard that it is to encourage people to stop driving and used mass transit, but it isn't working. Instead people just park in the nearby neighborhoods and it increases crime and traffic. There is no thought for efficiency or what REALLY works (there is just cars lined up everywhere down streets which looks so junky).... they just ""shove"" everything in like fitting in the wrong puzzle piece.... it isn't pretty and it doesn't work!! You all are always adding apartments which brings hundreds and sometimes thousands of more cars into an area without adding any more roads, lights, etc... to accommodate the growth. Nothing is well-thought out. My husband and I often say, the person that manages the Portland Airport should be managing the cities of Portland and Vancouver..... because they know what they are doing!! They are always expanding, but also beautifying the property (not just a half-hazard job). Their property always looks stellar (even the drive to and from the airport is beautiful and well maintained). As they've grown, they find solutions for increased traffic, parking, pick up and so forth. They do a great job of managing all the pieces which is not true of Vancouver at all (it has continued to decline, decline, decline and look worse, worse, worse. Back when Royce Pollard was mayor, he revitalized the downtown (especially cleaning up Esther Short park). He made Padden Parkway, he make the beautiful landscape on Andreson and so forth (he was ALWAYS a step ahead versus a many steps behind as we are now). They were always improving the city.... now it seems the opposite... it is truly sad to see this city that I have loved so much (and had so much pride in) and raised our children in become a BIG OLD DUMP. I really hope there is much more thought put in building, planning for the future!! Things have got to change or it will become just a city dump (so many people that did care have now moved out of area and we think about it often ourselves.... slowing the good people are being replaced by others moving in that have no care at all)."	
48	*Incomplete form, no comment received*	*N/A*
49	*Incomplete form, no comment received*	*N/A*
50	"I am writing to strongly OPPOSE the re-zoning proposal along SE 165th Avenue to mixed use AND rezoning the entire Village to medium density residence. This plan will have substantial negative impacts for the whole community at large, violating our privacy, peace, and integrity of our neighborhood. We specifically chose this neighborhood to purchase a home and plant roots for its specific qualities as is (after renting in this same neighborhood). This is the first place we've felt like home and we do not want to see this neighborhood fundamentally change in irreversible ways. We strongly urge you to KEEP THIS NEIGHBORHOOD EXACTLY AS IS.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Some increases in allowed residential density and building scale are needed to accommodate state-mandated housing growth targets. The Preferred Alternative would zone the Village at Fisher's Landing as a

ID	Full comment	Response
	I also strongly OPPOSE the proposal to move to Middle Housing. The definition of Middle Housing is insufficient to protect our special neighborhood and community as is - e.g. with 4x cars in this space, it will irrevocably destroy the ability to walk with our pets and children in a safe manner, and the roads/infrastructure will NOT be able to support this change. As it is, the street changes to the 34th getting onto 168th have nearly caused multiple accidents, endangering the community and its people. Please seek representative voices in the community and LISTEN to the people who live here - based on speaking to other neighbors, I strongly believe the consensus will be to keep our neighborhood and community as is (no change). Thank you."	mix of Medium-Scale Neighborhood, Low-Scale Neighborhood, and Manufactured Home zoning. Refer to Common Response #2, General Growth and Quality of Life Concerns, for more information about how growth is being distributed throughout the city.
51	"I OPPOSE the following proposals: re-zoning along SE 165th Avenue to mixed use AND rezoning the entire Village to medium density residence AND Middle Housing. We recently purchased a home after renting in this neighborhood because it gave us a unique sense of home and community that we have not found elsewhere and felt safe, peaceful, and quiet for our family and pets. This proposal will directly disturb and destroy our quality of life here and turn Fisher's Landing into a horrible place to live and visit. The roads, traffic, and safety have already been worsened due to recent projects that we were not given a voice on. It also cut down a ton of trees that make our Earth hotter, less walkable, and less environmentally friendly. Please do more to get public voices and do not change our neighborhood. We want to keep it as it is."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Some increases in allowed residential density and building scale are needed to accommodate state-mandated housing growth targets. The Preferred Alternative would zone the Village at Fisher's Landing as a mix of Medium-Scale Neighborhood, Low-Scale Neighborhood, and Manufactured Home zoning. Refer to Common Response #2, General Growth and Quality of Life Concerns, for more information about how growth is being distributed throughout the city. Refer to Common Responses #4 and 5 for more information about traffic impacts and safety.
52	Re-zoning our neighborhood and others like it is a disastrous plan that will lower property values and diminish the quality of life we have enjoyed for the past 40 years. Cramming 40,000 more housing units into Vancouver without expanding boundaries will lead to lower quality of life for everyone here now and in the future. I, for one, will leave my home for another state if this goes through as proposed. I am a lifelong Washingtonian and resident of Vancouver for the past 40 years, but this will be the last straw. I strongly encourage you to reconsider.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
53	*Incomplete form, no comment received*	*N/A*
54	*Incomplete form, no comment received*	*N/A*
55	"I live three feet from light industrial, which has become heavy industrial due to one specific business, that has caused damage to my home. The endless parade of semi trucks and the vibration, and being feet away from me has caused seriopus issues to my unit, which is the closest., and now is spreading to my neighbors. Not all the units on NE 109th are rentals, you know. The ones built first were condos, and it was supposed to stay that way until we were annexed and you allowed the apartments instead. But some, like mine, are condos. I live on the street, on the actual sidewalk, right up to the street of 109th, I do not have a set back: We did not need it, we were county, and when annexed we were promised this would not become a no mans land , but it did. I do not have any protection from the semi truck traffic I already endure. If you do either of the alternatives, I'll be honest: You will have destroyed my life, and any future I might have. I will have to make the choice of whether to give up, or give up. Let me explain how bad it already IS on this road: The business that is at this time, conducting heavy industrial does NOT have the space for these huge semi trucks, he needs to be fined for what he's doing, If you change this to heavy industrial, it will add countless semi trucks to a tiny two lane road, where over 600 people reside. That is just in the HD housing, not counting the homes back on Morrow! It is our only way in an out. As it is, we fight the semi truck traffic, if you allow countless unchecked heavy industrial places to go in, we will not be able to leave our complexes, and the pollution is unacceptable. How dare you expect us to live in pollution and the banging, clanging, beeping crashing, screeching, that comes with heavy industrial? Have you ever even been down this street? The zone goes from industrial to residential in the middle, but officials and vpd see the whole area as industrial and that the semis can do what they want, its us humans who do not belong here. If	Please refer to the comment response to comment 39.

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	one more 311 operator or VPD officer tells me to ask my landlord for a different unit, I will lose it. I OWN THIS CONDO. I CANNOT JUST ASK FOR A DIFFERENT ONE. NOW FOR THE IMPORTANT PART: As it is, the semi trucks have caused cracks in my walls, the windows are popping out, and I cannot tell my insurance, because as soon as they find out about this? They will drop me. They will not insure a condo in an heavy/industrial area! No one will! And if my condo loses insurance, the bank will move to foreclose. My home was built when the light industrial across from me was still zoned commercial. Most business use box trucks and vans, except for the one outside my bedroom window. It has been absolute hell the last 5 years trying to get the city to understand this specific business has grown too large for his space. Semi trcuks driving onto the sidewalk I legally have to maintain, crashing into the fence thatyy is my only protection from a semi barrelling into my kitchen is NOT a way to live. And if you go with either of those plans, you will make it twenty times worse. You have not maintained 109th in any way. No street lights, half has no sidewalks, no bike lane, not ONE CROSS WALK. Semis parked all up and down the road, makes it basically a one lane, and you want to make that heavy industrial? What are you thinking? Kevanna Park has zero walkability, we have no park , no greenspace, but you want us to walk to safeway, for our food and medicine, and walk it back, all while dodging semis and our food getting polluted? Did you give any thought to the over 600 condo and apartment residents? Any to the neighborhood behind us, with another 600 plus residents? Ot the two new apartment complexes? Or the new townhouse condos? The stop sign and 4 way stop area are exactly as they were when we were county! No one removes dumped vehicles, Semis idle for 17 hours at a time, vibrating my home, at what point did anyone look at the map? I invite you to my home, to my backyard. I invite you to see what nightmare i live with every day, and explain why it is in everyones best interest, that I lose everything I worked for? This place isnt much. No im not rich. But I was so proud to be able to buy this place something I could afford, and make my own. And that is not what I got. I do not have a home. I will never be able to sell, I can't rent it out knowing it doesn't have insurance, so I am, trapped, for the rest of my life, in a home I will never be safe in, happy in, or comfortable in. This is not ok. what you are doing to me, to others, is not ok. I know it won't make a difference, you will do what you want, regardless of how it harms people. It's inhumane to do this to us, we are part of the most vulnerable populations in the city, low income who managed to purchase their dream....and you took it without even blinking. I don't know what to do with a condo I cannot insure. Do you have an answer for that? Since YOU CAUSED IT? What about my neighbors, who are unaware of the nightmare coming from their insurance? I have lost all faith in any leadership in this city, looking at what you have planned, it's like you want to starve us out, or smoke us out with smog. If you want the neighborhoods to demoslish, just make an offer on them. Most of us would be more than willing to sell to you and leave. You can add more bike lanes, AND we would leave, lessening the strain on the population. I will never be ok with this, it is so wrong, and you knew we dont have an association or neighborhood liason officer. This is taking advantage of that, and us. You don't require any kind of set back or protections from the noise and pollution, just expect us to take it because its what we deserve? I sit in my house in tears every single day because I don't know what to do, I worked so hard for this...for nothing. For something that is falling down around me, and I have to sit here and just watch it happen. Yes, I cry every single day about how I currently live, I am sobbing seeing how much worse you want me to suffer. Where contractors village went up nearby? THAT is what needed to happen on 109th. The freeway is behind us. At this point, why doesn't the city make an offer on the condos? Make me an offer, and I will gladly go, and I won't stay in vancouver. Make me an offer. I'm begging you."	
56	Traffic revision and improvement projects in Vancouver take far too long to complete and, while underway, the provisions for alternate routes are inadequate or not even a consideration during planning. One example is the improvement project taking place on 1st St between 172nd and 192nd Avenues. This project is in its third summer and the alternative east-west routes along Mill Plain or 18th Street to the north are often restricted by small projects as well. This length of time for a project of this size is completely inexcusable and could be avoided by holding Transportation and contractors accountable. Projects of this size in other parts of the US and the world take much less time to complete while achieving similar or superior results. This is an issue that is going to impact all future	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update.

ID	Full comment	Response
	budgeting and planning decisions by raising the frustration level of the public to where we will demand much better performance.	
57	Less bike lanes and empty busses	Comment noted.
58	Alternative 1 is strongly preferred over #2! Regarding public services, we need to ensure we allow natural gas. Regarding "other", we need to address the homelessness in and around Clark County. We cannot follow suit of Portland. It has become a cesspool and we need to ensure we are proactive and there are steps taken to avoid becoming the next Portland.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 includes strategies to minimize energy-related emissions including actions that encourage energy efficiency and the transition away from natural gas. Refer to the Housing section of Final EIS Chapter 3 for a discussion of the potential effects of the Comprehensive Plan Update alternatives on housing diversity and supply, as well as proposed Comprehensive Plan policies to address impacts to housing and homeownership. Refer to the Our Vancouver 2045 website for the Comprehensive Plan Housing chapter, which includes goals and policies to address homelessness. Refer to Common Response #15 Homelessness for more information on how the City is working to address homelessness.
59	"For the maps: Yes to increasing density in CURRENT areas. That said, under no circumstances should farmland be turned into more houses, commercial, or industrial use. Given the tariffs and more imposed by the current federal government, it is our top responsibility to support small farms if we want to be able to feed our population as we grow. For transportation: We need more protected bike lanes. I live west of 205, but it's impossible to safely bike to downtown right now. I would if there was a safe way to get across the Lieser overpass."	Comment noted. All proposed alternatives, including the Preferred Alternative, would accommodate expected growth within current city limits and do not propose expansions of the urban growth area into rural or agricultural land. The Transportation section of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 identify improvements to active transportation infrastructure as proposed Comprehensive Plan policy measures.
60	I love my Southcliff neighborhood.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
61	Please complete the walking/bike path along Evergreen Hwy to 164th. There is no sidewalk, and the shoulder disappears at some places. At one of those places, I was personally walking and was hit by a vehicle resulting in a broken arm and traumatic brain injury. I reported the injury and am describing it here so that the city is on notice this is a dangerous road. There is a neighborhood part nearby, but residents on this stretch of Everygreen (Columbia springs to 164th) have no option but to walk on the road to get there. I was simply walking around the block when I was hit and seriously injured. There is a portion of the existing plan that includes a walking/bike path on the north side of Evergreen.	Comment noted. The Transportation section of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 identify improvements to active transportation infrastructure as proposed Comprehensive Plan policy measures. The Transportation System Plan (TSP) identifies SE Evergreen Hwy: MUP from Columbia Springs Park to SE 164th Ave (ID 535) and SE Evergreen Hwy: MUP from SE 164th Ave to city limits (ID 537) as locations for small mobility and pedestrian projects. See the Capital Projects List in the TSP for more information. Refer to Common Response #7 for more information about sidewalks.
62	*Incomplete form, no comment received*	*N/A*
63	City leaders: please start thinking about the environment and our commuters first! Stop this lane shrinking nonsense. Try living and using SE 34th on a daily basis. You will find backed up traffic, dangerous driving and long wait times at both ends, 192nd and 164th. Try common sense, please! More people, more cars, less transit use does not equal fewer traffic lanes. I'm sure our traffic engineer is embarrassed by this whole lane shrinkage nonsense. Please please please.....it's common sense. Use it!	Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. The Transportation section of Final EIS Chapter 3 addresses potential impacts of the alternatives on traffic and transportation, as well as proposed mitigation measures to offset potential impacts. Refer to Common Response #4 about vehicle traffic impacts.
64	Clark is the second most densely populated county in the state. Traffic is moving slowly much of the day. Driving south of Fourth Plane on 162nd are several large warehouses that are not totally in use. When they are in use many large trucks will be added to the street without an easy route to or from the interstate system. Highway 503 (117th	Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update.

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	ave) is another north south route with heavy development. Housing demands for the expected new arrivals will require more roads with no plans or places to build them	The Transportation section of Final EIS Chapter 3 discusses freight and addresses potential impacts of the alternatives on traffic and transportation, as well as proposed mitigation measures to offset potential impacts. Refer to Common Response #4 about vehicle traffic impacts.
65	"This is a LOT of information. Overall, I agree with the sentiment that housing growth and density are needed. What I feel this plan is lacking is an idea of creating sort of ""urban centers"". An example of this is downtown Vancouver. In downtown, one can work, live, eat, shop, have entertainment in a dense population area. Vancouver as a city has been creating more and more sprawl and I feel a neglected part of this is an opportunity to create more of these ""urban centers"" in other areas of town. I don't count developments that require you to drive to them and have a big parking lot with a set of pre-planned retail strip malls and a few restaurants and a Target. That type of development Vancouver has been doing lacks innovation, feels soulless, and requires me to drive everywhere to get to those areas. I would love to see some of those mixed use neighborhood areas be more street facing (think main street between 4th plain and mill plain) with neighborhood backbones. People that live in the neighborhoods can utilize the local areas more intensively and it allows for more small business use. Some of the proposed areas (such as 39th street in Alternative 2) just list the whole street as red. This whole area likely doesn't need to be mixed use and this would likely increase traffic and noise on this already busy street far too much. Instead, small pockets of retail or restaurants or mixed use buildings at thoughtful spots along the street could be a central community draw point without making it too dense. Overall, with all of this part of the recommendation, I would advocate for building up more urban center points rather than ""anywhere USA"" strip malls with big parking lots. Lastly, TREES!!! I don't know if you have noticed how many trees in Vancouver have been dying the last few years (especially all the red cedar) due to all the heat, but this trend doesn't look to change and the city's goal of 28% canopy is almost impossible without a concerted effort to increase the tree plantings and replacements. All new development that removes these trees and ""replaces"" them with trees that seem to be inevitably dying within a couple years is not enough. No matter what happens, MORE TREES PLEASE!"	Comment noted. The Preferred Alternative uses Mixed-Use Neighborhood and Regional Activity Center zoning districts to identify areas that are intended to be “urban centers” in different areas across Vancouver. Refer to the Land and Shoreline Use section of Chapter 3 for more information on identified urban centers and corridors. The Preferred Alternative designates 39th Street as Medium-Scale Neighborhood, which allows for residential and limited commercial uses. The Plants and Animals section of Final EIS Chapter 4 addresses potential impacts of the Preferred Alternative on trees, as well as proposed mitigation measures to offset potential impacts and enhance the level of tree canopy cover citywide.
66	"First, I’d like to share my appreciation for the hard work and thoughtfulness that went into drafting the alternatives. I especially appreciate that diversity, equity, and inclusion as well as climate are visible components of the process, despite the efforts of the current presidential administration to change that. My home is currently just a four blocks north of Vancouver city limits, but I grew up in Ellsworth and Cascade Park; eat, drink, and play across the city and county; and I work for Burton Elementary. I’ll try to be concise in my comments. I generally like the higher density and mixed use options of Alternative 2. I love the idea of building a variety of housing near transportation options and encouraging walking neighborhoods. I also appreciate the expansion of green space to something like 6 acres per 1,000 residents (if I remember that correctly). I think these things will be important to the quality of life and the accessibility of that quality in the future. I had a few other thoughts, questions, and concerns while looking at the maps (especially regarding the East where I live and work and play). Impact on low income neighborhoods and the schools serving them - When I looked at the map of the East (Alternative 2), I noticed that there could be a great deal of development surrounding Burton and Endeavor elementary schools, an area that is typically home to lower income families. I’m concerned that development in this area could price the current residents out of their homes and neighborhoods and make this are less affordable. What is part of the plan to prevent (as much as possible) the gentrification of this area? I am also concerned about the increase in population density here because those two schools (unlike many schools in Evergreen Public Schools) are already full to capacity and more. The schools have been rebuilt in recent decades and aren’t likely to get any bigger any time soon. How will the city’s plan for increased density incorporate working with both school districts (Vancouver and Evergreen) to minimize school overcrowding? While looking at the same map (Alternative 2, East), I also noticed that some neighborhoods seem spared from change. To put it bluntly, why is development most prominent in lower income areas and less so in more affluent areas	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to the Public Services and Utilities section of Final EIS Chapter 3 for more information about modeled school capacity needs and student generation rates for each of the alternatives, which were developed in consultation with the Vancouver and Evergreen School Districts. Refer to the Our Vancouver 2045 website for the Comprehensive Plan Update, which includes a Housing Chapter that addresses residential displacement, an Annexation chapter that addresses future annexation plans and policies, a Natural Environment chapter with goals around preserving natural resources, and an Equity and Inclusion chapter with more information about acknowledging historical injustices, reparative actions, and diverse identities. Refer to the Water and Plants and Animals sections of Final EIS Chapter 4 for mitigation measures related to water quality and availability and preserving natural resources.

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	like Cimarron, First Place, and Cascade Park? The folks in lower income areas may bear the brunt of the changes with fewer resources to do so. Annexation and developmental considerations of areas east of 205, north of Fourth Plain, and extending beyond Padden Parkway - Please annex neighborhoods like mine (Orchards) so that we can benefit from the city's planning as well. There are several elementary schools and at least one middle and high school in our area that are part of Evergreen Public Schools but not part of the City of Vancouver, so they won't benefit from the city's planning. This could lead to increasing inequities between schools within the same district. As a resident of this unincorporated area, I don't particularly enjoy the recent explosion of storage facilities and warehouses in my neighborhood - they don't serve me, and, frankly, they're ugly. I too would like a walkable neighborhood with food, entertainment, and other services nearby. Water conservation and management with a growing population - How does the city's plan incorporate a growing concern over water quality and availability as we grow into a warmer future? We're very fortunate to live in an area of the world and country with a seemingly endless supply of water. Unfortunately, it is a finite resource that will require increasing levels of care and conservation as demand for it increases and supply decreases as a result of climate change. Habitat fragmentation and urban heat islands - Finally, I think a lot about birds and plants (weird, I know). As Vancouver has grown over just my lifetime, I've seen wild and otherwise heavily vegetated areas developed for various uses. Over time, it occurs to me that we're running into a situation where we're creating a scarcity of natural areas that support wildlife, one of the incredibly valuable natural resources and treasures of the Pacific Northwest. How does the city's plan for development increase spaces specifically and thoughtfully developed to reduce habitat fragmentation so that we can ensure the longevity of our animal and plant friends and family? I also know that with an increase in spaces developed for human use, we usually experience more urban heat islands (among other issues). In what ways does the city's plan include considerations for increasing shade, decreasing the abundance of male (pollen producing) trees and shrubs typically used in city landscaping (supposedly because they're less messy), and increasing the use of indigenous plants that are both acclimated to our climate (requiring less water) and usable by our animals (including humans) for food and shelter? I lied - I have one more question about partnering with the indigenous nations in our region - How will the city partner with our local indigenous nations in ways that honor their past and support their future? We are on occupied land, and the stewardship of that land and all of its peoples (including the tribes, recognized and unrecognized) could and should be part of the city's story and legacy."	
67	I am concerned that any plan that forces people to live in high density housing will be unfriendly to families with children. Living in close proximity to a family with infants and/or small children is going to create frustration for their neighbors. I currently live on a 1/4 acre lot and the children playing on the lot behind mine sometimes create a level of noise that is objectionable. Living with a noisy family adjacent to your apartment or above you will create even more problems. Children by definition also need their own play space outside. In our wet Mediterranean Coast climate, finding outdoor space in winter for children's play is important. Eliminating "single family residences" is a decision that will adversely impact families, especially those with infants and small children. America needs more families, not less!	Comment noted. Under the Preferred Alternative, most of the City's residential areas would be zoned as Low-Scale Neighborhood or Medium-Scale Neighborhood. Some increases in allowed residential building density and scale are needed to accommodate state-mandated housing growth targets. While the Preferred Alternative allows for higher density housing, it continues to allow for a variety of housing types and sizes to accommodate a variety of lifestyles, including family-sized units. Detached single-family housing will still be allowed in many places across the city.
68	*Incomplete form, no comment received*	*N/A*
69	"1. I am in favor of Alternative #1. 2. Streets: Pls consider building more Intersection Round About's to mitigate hazardous driving: - Most critical need would be ""overly large"" Intersections within residential neighborhoods; these attract high speed vehicles making ""donuts"" every other weekend starting at sunset. There are several, but typical example: T-Intersection of SE 22nd & SE 25th & SE 26th. - if round about is not feasible, perhaps add some other type of speed-calming barrier. Thanks."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.

ID	Full comment	Response
		The City's Transportation System Plan (TSP) includes roundabouts in recommendations for some Future Large Capital Transportation System Improvement Projects. For more information, see the Transportation System Plan webpage on the City's website for more information.
70	I oppose allowing 75 ft buildings on 33rd at Franklin. This is a neighborhood of small family homes in one of Vancouver's oldest neighborhoods. The historic character will be obliterated by this upzoning, which is more appropriate in newer neighborhoods where the historic character will not be lost.	Comment noted. The Historic and Cultural Preservation section of Final EIS Chapter 3 acknowledges the potential for disturbance of individual sites and associated impacts to historic resources and provides mitigation measures designed to offset these impacts. The area around 33rd and Franklin has good connectivity and access to essential services, parks, schools, and transportation options. Allowing buildings to be constructed up to 75 feet in areas with transportation options and nearby services helps focus growth where the infrastructure can support it, and can help reduce pressure to redevelop older buildings that contribute to historic character.
71	I prefer the higher density of regional activity centers and medium-scale neighborhoods presented in the Alternative 2 map.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Compared to Alternative 2, the Preferred Alternative would zone a similar amount of land as Medium-Scale Neighborhood. It would zone less land as Regional Activity Center compared to Alternative 2 but more than Alternative 1.
72	Prefer the proposed zoning changes in alternative 1. Alternative 2 could mean changing the existing neighborhoods too much and decrease quality of life for current residents.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #2, General Growth and Quality of Life Concerns, for more information about how growth is being distributed throughout the city.
73	"I support Alternative 2. Please don't make reductions to our current tree protection or planting plans. Whenever people point out nice cities, one prominent theme is trees. Trees make a neighborhood. Keep the trees we have, replace the ones we lose, and plan places for more trees within our urban areas."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Plants and Animals section of Final EIS Chapter 4 addresses potential impacts of the Preferred Alternative on trees, as well as proposed mitigation measures to offset potential impacts and enhance the level of tree canopy cover citywide.
74	"In reviewing alternative 1 I liked that there were more mixed use zones vs in alternative 2 those same spaces we're industrial/employment zones. Mixed use is key to creating walkable and sustainable communities. I liked that alternative 2 had much heavier density of medium scale housing vs low scale housing density, especially in my neighborhood in South East Vancouver off of Mill plain. Increasing housing density is critical to addressing housing	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more

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	costs while minimizing environmental impact, improving the health of our community and economic success of local businesses. I liked that alternative 2 had much heavier medium density housing in my area (South East Vancouver off of Mill Plain) vs"	information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
75-1	"The current plan for Mapping Vancouver Future is rife with ideas that seem fine on the surface, but terribly undervalue the people within the community. The extent of heavy industrial land use in prime areas for natural areas, parks, and even mixed neighborhood usages of both shops/housing is a terrible use of wonderful areas for prosperous development of community over monied interests. The attempt to spread out the areas for commercial development also don't seem to align with the idea of a 15-minute city, as there doesn't seem to be any plans for transportation outside of buses, which simply clog traffic lanes. The lack of inclusion of a tram system, perhaps even elevated one, to future proof specific areas like Mill Plain and 4th plain is pretty ludicrous considered the climate migration from southern states within the U.S that will happen within the next 20 years. The lack of green spaces, which are necessary for air quality, earth, climate and prevention of heat domes are simply lacking from the plan. Not to mention river access to the majority of Vancouver's population has been hidden behind private housing. There is a wonderful waterfront available, but now it is only accessible to people of downtown, which is soon to be blocked by continual fees on the population concerning parking, and cost of participating in the business of the area that have price points that ward off large sections of the community. Very simply put, this plan is incredibly Neo-liberal and generates a feeling of IKEA land management/city building. There has to be a better version of the city's future that doesn't include this Gentrified-Millennial-Brutalism that is already popping up throughout the city (the new waterfront looking like an airport for example) that removes meaning and purpose from the everyday lives of community members in service of clean aesthetics. Whats the point of living here if it doesn't even LOOK like a person can afford it? IN short, please do not yuppify Vancouver to appease the influx of people trying to make it look like Colorado, California and Texas. Lets make's Vancouver its own unique place, with its own unique vision, that isn't bogged down with this idea that we need to appeal to businesses over everyone else."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative proposes no changes to the amount of land zoned for Heavy Industrial or Parks and Open Spaces compared to the No Action Alternative or current conditions. Refer to Chapter 2 of the Final EIS for more information on the distribution of different types of land throughout the city. The Aesthetics section of Final EIS Chapter 3 identifies measures intended to avoid, minimize and mitigate impacts to aesthetics, including ensuring compliance with citywide standards for landscaping and tree conservation. The Water and Plants and Animals sections of Final EIS Chapter 4 also identifies measures that support green space, trees, and limiting new impervious areas.
76	We absolutely must pick alternative 2, because of the mixed-use potential of uptown, Shumway, and Arnada. Think of the best walkable neighborhoods in the world, and they all include real human centered business! We need cafes, bodegas, parks, and high density infill development in order to bring people out of their homes and onto the streets. Vancouver already has so many good examples of this, why not expand the concept to more neighborhoods?	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
77	I would like to comment on the proposed Southcliff, Vancouver zoning changes.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
78	"Proposed zoning changes for the Southcliff neighborhood are all unacceptable. They would change our neighborhood from single family residential to mixed use multi family. More pavement and dwellings would cover permeable surfaces,polluting water and air. Noise would increase, heat will increase as Trees would be cut down. Traffic Would increase on neighborhood streets as delivery trucks service the business and multifamily apartments and condos. There are no requirements for parking spaces at residences or businesses so cars would line the streets. Crime is frequent in business areas and would increase in our neighborhood. Litter would also increase. The city would need more police and fire protection and other services making taxes increase. Commercial use is not needed in our neighborhood. We are already within walking distance of restaurants, coffee shops, and other businesses. Medical facilities and grocery stores are nearby and the tower mall project will add many more services and businesses near us. Keep Southcliff single family residential only.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	The neighborhood is a midcentury gem and should not be destroyed by zoning that allows commercial and high rise multifamily dwellings.Thank you for your consideration."	
79	The higher densities allowed and encouraged by Alternative 2 are appropriate for Long Range planning and the future of Vancouver. Mixed-use zoning designation that does not require commercial uses on the entire ground floor is necessary, or at least a path via conditional use permit or other process is needed to allow residential uses in commercial zones, otherwise commercial zones will remain undeveloped for the next 2-3 Comp Plan update cycles.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. In the proposed zoning code, ground floor commercial would be allowed with residential in Mixed-Use neighborhoods but would only be required in a few limited areas. Refer to the Our Vancouver 2045 website for more details about the proposed zoning code updates.
80	I dont believe it is beneficial to zone soany of the current single family plots to multi family ploys for multiple reasons. It seems that in doing so your increasing volume into spaces which can impact parking and traffic issues, it is also noted in the plan that there is a negative impact on vegetation, heat, and aesthetic. I.derstand ou want to be able to.make more housing, but it also takes away the opportunity for people to have their own space through ownership and creating generational wealth, which is how the average person is able to get into a house. More is not always better. So my preference would be either no change...although that map wouldn't load....and then Second choice if pressed would be alternative 1.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
81	Alternative 1 seems like the best plan to address expected needs without changing so rapidly that huge apartment complexes with lack of parking are not thrown into neighborhoods thst don't have adequate roads or nearby services to accommodate them.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. The Preferred Alternative distributes growth around the City more evenly than Alternatives 1 and 2, helping to ensure that impacts are not concentrated and that different areas of the City benefit from future growth and investment. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Responses #4 and #6 for more information about vehicle traffic impacts and parking.
82	Concerning aesthetics, I see many beautiful aspects about Vancouver downtown and surrounding neighborhoods. Always nearby these sites are mounds of trash, garbage, and graffiti. There are people who have the effrontery to place their tents directly on a sidewalk in areas where it should not be allowed. I understand the problem is multifaceted, but safety and sanitation are great concern. Also, the number of loud and speedy cars traversing the newer shoreline areas is concerning, especially on the street along the waterfront. Consider making it pedestrian friendly.	Comment noted.
83	"I strongly oppose the rezoning of South Cliff along Mill Plain to mixed use. Our neighborhood is already bearing the extra use/parking need for the Tower Mall development. We purchased this home 2 years ago because of the neighborhood. The well preserved mid century homes with trees everywhere, a park and wide streets. For the sense of community and quiet strolls around the neighborhood. The power lines behind homes in Lady Bird Johnson style to facilitate the meeting of community in the front of homes. It would be such a shame to lose that along our street which would provide access to the Mill Plain allowed businesses if this change goes into effect. Please reconsider the zoning overlay of our beautifully preserved, historic community. Thank you, Carolyn Noesen"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
84	"The Village of Fishers Landing is not conducive to mixed use development. There is not any vehicle entry into our area from SE 164th Ave, nor would it be safe to create one due to the proximity of Exit 8 from Highway 14, as well as our brick sound barrier wall. The traffic on SE 164th and Highway 14 create constant noise and vehicle fumes, so it is very necessary to maintain the wall and fences, along with sizeable trees in order to have a natural air and sound	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	filter. There is only a poorly navigable sidewalk from SE 39th onto SE 164th, which is the area south of Village of Fishers Landing, and the Village has no access to that area using sidewalks. The housing in Village of Fishers Landing is 25-40 years old, and well-maintained, so the properties are not candidates for replacement any time soon. The lot sizes however might lend themselves to additions of ADUs. FIshers Creek flows through this subdivision, with a large catch basin, plants in the water shed that filter rain water, natural vegetation and significant wildlife. It is of great concern if excessive building from divided lots were allowed as it could further contaminate this specific area. Land use along this Creek should be monitored. The Village of Fishers Landing, which includes six housing divisions, built up between 1985 and 2005, has a safe and friendly neighborhood ""climate"", with diversity of citizens from many cultures. The crime rate is very low -- neighbors watch out for each other and each other's property. Some homes have multiple generations within one house. Adding ADUs to properties, or replacing properties with two-story duplexes and/or a"	
85	What is the advantage to me of the city and exiting my area, is it just a money grab for the additional taxes or is there better services for fire for police?	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update.
86	"Hello, This is something completely new for me so kindly pardon my ignorance, if any, as you read the following - We live just outside the Vancouver City limits (near Summit View Church on 182nd) and the maps I have seen are ending very close to our home. I was wondering if you have taken into account how people who live just on the edge will be affected. At the moment, it seems, we do no belong in any city - Vancouver, Camas, Hockinson, etc. So I guess my first question is, who should we even talk to about these things? For instance, I see a lot of warehouse type construction on 162nd by Safeway and if the nearby areas have more industrial development are we going to see a lot of semi trucks driving around in this area? On a related note, I wanted to also ask if the City has any plans to expand its limits? I was under the impre"	Comment noted. The study area for this EIS only includes the current Vancouver city limits. Clark County is also updating their comprehensive plan at this time and may be able to provide assistance. Please visit their website for more details and contact information. Refer to the Our Vancouver 2045 website for the Our Vancouver Comprehensive Plan chapter on Annexation for goals and policies related future annexation plans.
87	*Incomplete form, no comment received*	*N/A*
88	I'm an 86 year old Kaiser patient. It's very difficult and expensive for me when so many facilities/services are in Oregon because Vancouver won't approve a large facility, including a hospital here. When my sister was in the hospital in Oregon she was provided with a list of nearby hotels so her family could stay near. When we have an urgent visit and go to the emergency room here we need to pay for an ambulance to a Kaiser hospital in Oregon.	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. We recommend you contact your insurance company to provide this feedback.
89	"I am largely in support of Alternative 1, and after meeting with City staffers I am glad to see the work put into this. I would really like to see denser development of undeveloped areas such as Section 30 and the former Fisher's Quarry site, as well as projects along larger corridors such as Mill Plain & Fourth Plain Blvd where there are plots that are either empty or under maintained. I am worried that the simplified zoning categories will encourage developers to build projects that do not ""fit"" with their surroundings however. I have seen several areas in the County where developers have built poorly designed higher density housing in small plots without much consideration for the neighbors or the nearby transportation infrastructure. I ask that the City consider how to provide higher density environments for those that want and need them without displacing and/or unreasonably burdening those who have made the more suburban regions of Vancouver their home. If more permissive zoning is to be approved, I ask that the City pay more attention on a case by case basis to what is built and where."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative proposes higher-density land uses in Section 30 and along Mill Plain and Fourth Plain Boulevard. Refer to the Aesthetics section of Final EIS Chapter 3 for more information on the potential impacts of denser buildings and proposed Comprehensive Plan policies to address these impacts.
90	"Comments on July 2025 Vancouver City Comprehensive Plan, EIS From Michael F. Donnelly, Ph.D, Geology (Stanford University, and former USGS, Menlo Park and Flagstaf) Resident Southcliff 1991 to Current ([address]) I have concerns about any increase in housing or commercial density in the Southcliff Neighborhood, as represented by the all three rezoning categories (Mixed Use, Medium Scale and Low-Scale).	Comments noted. This EIS is a non-project EIS, which means that it is required by SEPA to review the potential impacts of the alternatives at a high, qualitative level based on available mapped information. The SEPA regulations (WAC 197-11-442) note that a non-project EIS is more flexible and is not required to provide site-specific detailed analysis. Additional site-specific environmental review will occur as appropriate when other project or non-project actions are in the future.

ID	Full comment	Response
	I am concerned about the model outcomes for the EIS Earth Section (pp. 143-154) in Chapter 4 (Natural Environment). Especially perplexing is how the EIS Conclusions for each of the three rezoning categories (City's Mixed and Middle Scale, and State's Low-Scale) were derived. This is especially applicable to the Significant Unavoidable Adverse Impacts (SUAI) and were compared within this neighborhood and adjoining areas. To address these issues could you please provide me with maps at the same scale with the same boundaries and major highway shown (I-5, 205, and Mill Plain Blvd) so that we can overlay the SUAIs for each of the three rezoning plans. These maps and data are needed to verify the EIS conclusions. In addition, could you please provide me with an explanation as to why the Geohazards (Chapter 4, pp. 144-155) for each of the three rezone human density categories for this neighborhood have no SUAIs. Did these conclusions include the City's Updated (Dec., 2024) Critical Areas Ordinance (CAO) that regulates geological hazards? If yes, how? If not, why not? The SUAIs appear more focused on incremental development growth impact on earth resources, rather than earth hazards on human development growth. The conclusions of the EIS are that all three rezone categories have "minimum" additional impacts and "no" SUAI due to incremental development growth. Please provide the factual and interpretive information leading to those two conclusions. However, geologic hazards (listed here on Table 1) are common to this neighborhood and adjoining neighborhoods within this EIS boundary. Their related geologic hazard responses would be directly related to both load and strain responses of the surface and subsurface rocks within these geologic features (Table 1). Such load and strain responses would affect both building foundations and height, density and related infrastructure stability, and therefore to public health and safety. The occurrence, frequency, and intensity of these listed geologic hazards will impact each of these rezone categories differently. Low density will have the lowest impacts, and high density (Mixed and Middle densities) will have the greatest impacts. Please provide me (on behalf of the Southcliff Neighborhood) with the factual quantitative data, modeling inputs, and major assumptions, along with the statistical and deterministic outcomes that resulted in these interpreted "minimal" and "no" impact conclusions for Geologic Hazards, particularly as they apply to this and adjoining neighborhoods. Potentially active volcanism near the boundaries of this EIS area and adjacent areas will likely include volcanic ash fall deposits and mud- and ash-flows. These are the most dangerous activity for human health and safety in this EIS area and globally. Higher density areas will have difficulty evacuating quickly and receiving emergency services quickly, especially on streets such at 4th Plain that in places are impacted by bike and pedestrian lanes replacing vehicle lanes. Therefore, higher density areas will suffer the impacts of volcanic activity more intensely than low density areas. The same is true for earthquake events, which involve surface tilting/displacement and subsurface faulting. Such activity will directly impact public health and safety, with the same relative results as will volcanism in areas of increased human density. Table 1 Identified Geologic Hazards Earth (pp 143-175), Water (pp. 175-182) Hazards Descriptions Volcanism Affects both seismicity and water resources (surface and ground water) as well as wildlife/animal habitats. Seismicity related to the type of volcanism, fault displacement, ground shaking, (especially horizontal), liquefaction, landslides/slope failure and accelerated surface erosion.	The Earth section of Final EIS Chapter 4 provides maps of existing geologic hazard areas and a high-level assessment of where impacts are more likely to occur. Parcel-specific assessment of impacts is not provided in the Final EIS. Geologic hazard data is publicly available for download via Clark County's Open GIS data portal. As discussed in the Earth section of Final EIS Chapter 4, regardless of alternative, all future development projects will be required to comply with city and state requirements for geologically hazardous areas. The City's development review process will ensure compliance with the geologically hazardous areas requirements under VMC 20.740.130. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	These related geologic hazards are directly affected by the type of surface soil profiles and underlying subsurface rocks, including this neighborhood's high radon exposure (p. 150, Fig. 33). These hazards respond to their geomechanical and petrophysical characteristics. They also impact the geohydrologic environment, both surface discharge drainage and groundwater aquifer recharge and their contamination. (See Southcliff neighbor and hydrogeologist Paul Pedone's comment to the EIS re regional groundwater systems including recharge rates, pp. 175-182) Page 182 of the EIS states there is no net loss of ecological function by avoidance of impacts and by compensatory mitigation related to water resources as the result of increased development density in the city, and particularly this neighborhood. However, these geological hazards within these three development densities will also impact animal and plant habitats, their boundaries and their biodiversity. These impacts include loss of wildlife migration corridors, with incremental destruction and contamination of lowlands/wetlands drainages. The more dense the development the greater these environmental impacts, including on human cultural preservation and urban archeology. Increasing human density within this EIS boundary requires a more scientifically rigorous and documented analysis. Without such an analysis, conclusions about geologic and hydrologic hazards within the volcanic airborne umbrella are premature and unsound."	
91	"Comments on July 2025 Vancouver City Comprehensive Plan, EIS From Michael F. Donnelly, Ph.D, Geology (Stanford University, and former USGS, Menlo Park and Flagstaf) Resident Southcliff 1991 to Current ([address]) I have concerns about any increase in housing or commercial density in the Southcliff Neighborhood, as represented by the all three rezoning categories (Mixed Use, Medium Scale and Low-Scale). I am concerned about the model outcomes for the EIS Earth Section (pp. 143-154) in Chapter 4 (Natural Environment). Especially perplexing is how the EIS Conclusions for each of the three rezoning categories (City's Mixed and Middle Scale, and State's Low-Scale) were derived. This is especially applicable to the Significant Unavoidable Adverse Impacts (SUAI) and were compared within this neighborhood and adjoining areas. To address these issues could you please provide me with maps at the same scale with the same boundaries and major highway shown (I-5, 205, and Mill Plain Blvd) so that we can overlay the SUAIs for each of the three rezoning plans. These maps and data are needed to verify the EIS conclusions. In addition, could you please provide me with an explanation as to why the Geohazards (Chapter 4, pp. 144-155) for each of the three rezone human density categories for this neighborhood have no SUAIs. Did these conclusions include the City's Updated (Dec., 2024) Critical Areas Ordinance (CAO) that regulates geological Thhazards? If yes, how? If not, why not? The SUAIs appear more focused on incremental development growth impact on earth resources, rather than earth hazards on human development growth. The conclusions of the EIS are that all three rezone categories have "minimum" additional impacts and "no" SUAI due to incremental development growth. Please provide the factual and interpretive information leading to those two conclusions. However, geologic hazards (listed here on Table 1) are common to this neighborhood and adjoining neighborhoods within this EIS boundary. Their related geologic hazard responses would be directly related to both load and strain responses of the surface and subsurface rocks within these geologic features (Table 1). Such load and strain responses would affect both building foundations and height, density and related infrastructure stability, and therefore to public health and safety.	Please see response to Comment 90.

ID	Full comment	Response
	The occurrence, frequency, and intensity of these listed geologic hazards will impact each of these rezone categories differently. Low density will have the lowest impacts, and high density (Mixed and Middle densities) will have the greatest impacts. Please provide me (on behalf of the Southcliff Neighborhood) with the factual quantitative data, modeling inputs, and major assumptions, along with the statistical and deterministic outcomes that resulted in these interpreted "minimal" and "no" impact conclusions for Geologic Hazards, particularly as they apply to this and adjoining neighborhoods. Potentially active volcanism near the boundaries of this EIS area and adjacent areas will likely include volcanic ash fall deposits and mud- and ash-flows. These are the most dangerous activity for human health and safety in this EIS area and globally. Higher density areas will have difficulty evacuating quickly and receiving emergency services quickly, especially on streets such at 4th Plain that in places are impacted by bike and pedestrian lanes replacing vehicle lanes. Therefore, higher density areas will suffer the impacts of volcanic activity more intensely than low density areas. The same is true for earthquake events, which involve surface tilting/displacement and subsurface faulting. Such activity will directly impact public health and safety, with the same relative results as will volcanism in areas of increased human density. Table 1 Identified Geologic Hazards Earth (pp 143-175), Water (pp. 175-182) Hazards Descriptions Volcanism Affects both seismicity and water resources (surface and ground water) as well as wildlife/animal habitats. Seismicity related to the type of volcanism, fault displacement, ground shaking, (especially horizontal), liquefaction, landslides/slope failure and accelerated surface erosion. These related geologic hazards are directly affected by the type of surface soil profiles and underlying subsurface rocks, including this neighborhood's high radon exposure (p. 150, Fig. 33). These hazards respond to their geomechanical and petrophysical characteristics. They also impact the geohydrologic environment, both surface discharge drainage and groundwater aquifer recharge and their contamination. (See Southcliff neighbor and hydrogeologist Paul Pedone's comment to the EIS re regional groundwater systems including recharge rates, pp. 175-182) Page 182 of the EIS states there is no net loss of ecological function by avoidance of impacts and by compensatory mitigation related to water resources as the result of increased development density in the city, and particularly this neighborhood. However, these geological hazards within these three development densities will also impact animal and plant habitats, their boundaries and their biodiversity. These impacts include loss of wildlife migration corridors, with incremental destruction and contamination of lowlands/wetlands drainages. The more dense the development the greater these environmental impacts, including on human cultural preservation and urban archeology. Increasing human density within this EIS boundary requires a more scientifically rigorous and documented analysis. Without such an analysis, conclusions about geologic and hydrologic hazards within the volcanic airborne umbrella are premature and unsound."	
92	"I favor the zoning plan that maximizes residential affordable housing with multiunit dwellings. I would be pleased with more highrise density and multi-units on residential lots, like Alternative 2. I would NOT like the city to promote temporary rentals for transient tourism, such as AirB&B or VRBO, vacation rentals by owner situations. We need residents in stable longer term neighborhoods.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.

ID	Full comment	Response
	I support zoning to attract middle income, living wage jobs so Vancouver residents can comfortably live and work and send children to public schools. Public transit and alternatives to driving single-occupancy vehicles will need to be factored in to the zoning. These are my priorities for future urban growth planning. Less important to me is single family large lots, lawns, pavement, and parking. With the right plans for mixed use communities, I am hopeful that Vancouver can avoid catering to automobiles requiring more pavement for wider streets, parking lots, and two-plus car garages. Thank you to the Our Vancouver - Comprehensive Plan 2045 project team for all the work in explaining a very complex project. I attended the Experience Our Vancouver 2045 on August 9, 2025 and have reviewed the information on the website. Thanks for the opportunity to learn, ask, and comment."	
93	*Incomplete form, no comment received*	*N/A*
94	*Incomplete form, no comment received*	*N/A*
95	*Incomplete form, no comment received*	*N/A*
96	"Subject: Comment on Proposed Mixed Use Zoning for SE 10th Circle and SE 9th Circle Dear Planning Commission and Community Development Staff, I am submitting comments on the OUR VANCOUVER Comprehensive Plan Update Draft EIS regarding the proposed rezoning of my property (Parcel [parcel number], SE 10th Circle) and adjacent homes on SE 9th Circle from Low-Scale Neighborhood to Mixed Use under both Alternative 1 and Alternative 2. I have reviewed the EIS materials, attended the City's open house, and understand the broader goals of increasing housing options, supporting mixed-use nodes, and meeting state growth requirements. However, I believe this particular location is not an appropriate fit for a mixed-use designation for the following reasons: 1. Cul-de-sac Access Constraints SE 10th Circle and SE 9th Circle are both cul-de-sacs with a single access point via SE Westridge Boulevard. There is no direct connection to SE 192nd Avenue, despite proximity on the map. Mixed-use zoning anticipates higher-density residential (up to 8 stories/110 feet) and commercial activity, which would significantly increase vehicle trips, service traffic, and delivery activity through this constrained, dead-end street system. This is inconsistent with the City's stated emphasis on safe, connected, and accessible neighborhoods. 2. Abrupt Transition from Low-Scale to High-Scale Development The EIS describes mixed-use areas as being most successful when integrated with walkable corridors or activity centers. In this case, the designation would be at the very end of residential cul-de-sacs, with no connecting commercial corridor. The shift from single-family and small-scale "middle housing" to potential 8-story mixed-use buildings creates an abrupt and incompatible scale transition, which the EIS notes can cause land use compatibility issues. 3. State Law Already Allows Additional Density Without Rezoning Under HB 1110, existing Low-Scale Neighborhood zoning will already allow up to four housing units per lot, plus additional accessory dwelling units under HB 1337. This means the state has already enabled meaningful density increases without introducing larger commercial-scale buildings in this location. 4. Alternative Locations Better Meet the Plan's Objectives The City's Draft EIS emphasizes focusing higher-intensity mixed-use near planned growth corridors and activity nodes. This site does not function as part of such a corridor and is better suited to remain a Low-Scale Neighborhood while still benefiting from new state housing flexibility. My Request	Comment noted. In the proposed Preferred Alternative, properties adjacent to SE 9th Circle and SE 10th Circle are assigned Low Scale Neighborhood and Medium Scale Neighborhood zoning. The Medium Scale Neighborhood zoning is applied along the 192nd Avenue corridor and around Fisher Basin Park, in alignment with the City Council's framework for getting to a Preferred Alternative land use map. The proposed Preferred Alternative directs higher-density growth (such as Medium-Scale Neighborhood) to key corridors and areas with good access to commercial services, parks, and schools, such as the properties on SE 9th Circle and 10th Circle that are adjacent to 192nd Avenue. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Zoning districts are not the only regulations that apply to any given parcel in the City. In addition to a zoning district, which every parcel has, some properties may be further encumbered by things such as site access, critical areas, private or public easements, or private contracts. If there are access constraints on the property that could prohibit or limit development, these factors would limit future building regardless of what the zoning allows. When development is proposed on a property, part of the review process includes assessing existing infrastructure like transportation and utilities to see if what is there is sufficient to serve growth, if additional improvements are needed to make them sufficient, or if site constraints limit development beyond what the base zoning allows. This includes ensuring adequate space for emergency response. If infrastructure improvements or additional access points are needed they will be required at the time of development. e If infrastructure improvements or additional access points are needed, those are required at the time of development. The Final EIS considers the potential impacts of the alternatives on compatibility with existing land uses in the Land and Shoreline Use section in Chapter 3. This section also outlines proposed measures to help avoid, minimize, and mitigate these impacts, including having regulations that provide transitions between zoning districts to ensure compatibility of adjacent land uses, such as setbacks and step-downs between zoning districts.

ID	Full comment	Response
	I respectfully request that the City retain the Low-Scale Neighborhood designation for SE 10th Circle and SE 9th Circle in the Preferred Alternative. This would allow the neighborhood to adapt to state-mandated housing changes while avoiding the safety, access, and compatibility issues that would result from a mixed-use designation at the end of cul-de-sacs. Thank you for considering these comments. Sincerely, Brian & Leanne McClary [address]"	
97	I loved the Alternative 2 map. I think more medium/mixed use all around is a good thing. I specifically think the medium use in the Lincoln area & south to downtown Vancouver is crucial. Extremely specifically, I think the land between Mill Plain/I5/Main/McLoughlin (and even up to 4th Plain) would really really benefit. There are still open, empty lots this close to downtown and that is a shame. Also, if there is any room here, please bring the MAX line to Vancouver. I think the benefits greatly outweigh the costs in the long term.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative proposes Medium Scale, Mixed Use Neighborhood and Regional Activity Center zoning districts in the Lincoln, Shumway, Hough and Arnada areas. Your comment about the MAX line was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Refer to the Interstate Bridge Program website for more information about how to comment on that project.
98	"I understand and support the need to build more housing units in Vancouver to combat homelessness, and to build as infill so as not to add to sprawl. However, for various reasons, I think Southcliff should be left as is. My husband and I chose to buy this house and property in 2022 because of all the land and surrounding greenspace, and because I want to slowly convert our land from lawn to forest and trees, planting native firs and other trees. There is a lot of land to allow me to do this. We cannot afford a 5 acre property in Clark County as the price of those homes starts at well over $1 million. There are also many large, old fir trees and other large trees in the neighborhood, and if this plan is adopted, most if not all of them will be cut down in the near future as neighbors move out and sell to developers. This neighborhood already has 47% tree cover, and I've already planted small trees that should grow large in the coming years and add to that tree cover. When we bought this property in 2022, we knew about the proposed development in the empty Town Plaza area and that made buying here more attractive knowing there would be shops nearby that we could walk to. I would like to suggest alternatives to rezoning Southcliff. First, consider concentrating new commercial and housing development in the adjacent Town Plaza. This approach would create a successful business district with the infrastructure needed to help businesses thrive, it aligns with City goals for vibrant economic hubs, and protects the unique character of Southcliff. Second, encourage Southcliff residents to replace more lawn space with native trees. Many homes have large tracts of lawn and the planting of trees would beautify those properties. If the rezoning of Southcliff is dropped, I think those owners would be happy to plant and grow more trees as an alternative. Third, the city should offer financial incentives, such as fee waivers or faster permit reviews, for developers who choose to redevelop existing commercial properties along Mill Plain. There are many empty storefronts along Mill Plain. Fourth, nearby on Andresen and Fourth Plain, there are huge empty parking lots and failing stores/businesses. These are eyesores. How about converting these areas to additional Regional Activity Centers with high-rise housing and businesses? The area on Fourth Plain where there's a Target and Barnes & Noble is one of them. Target and Barnes & Noble seem to be doing OK, but many of the other businesses there appear to be failing, specifically the Regal	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Cinema, and old, failed restaurant, and Crunch Fitness (which I recently quit due to them failing to do necessary repairs; I'm anticipating their closing soon). And the huge parking lot on Andresen where there used to be a K-Mart would be an ideal location for an additional Regional Activity Center or high-rise housing. Please consider focusing as much housing and business redevelopment as possible on these areas, which are also near Vine bus stops. Parking lots are horrible for the environment because they are large, impermeable surfaces. If redevelopment is performed in these areas, swale areas with new trees could be added which would beautify the areas. There's another such area on 76th Street in HazelDell where many big-box stores have failed and now sit empty and there's a huge, ugly parking lot. I fully agree much more housing needs to be built, and I think these three sites should be rezoned for that. Finally, I think all new housing needs to be townhouses, condos, or similar. It seems that all the new housing that's been developed in the last few years are single-family homes one or two feet apart. I know developers can get a lot more money for homes that sell as single-family homes, but building them that close together just doesn't make environmental sense. Personally, I'd rather own a townhome rather than a single-family home so close to my neighbor's houses."	
99	"Hello, Could edible community gardens be included for the public? Long term food sustainability and security for citizens - especially now with the current economic times and the progressive deterioration of quality of life for everyone below a 'certain' tax bracket. Thank you, Sara"	Comment noted. The Public Services and Utilities section of Final EIS Chapter 3 includes a proposed policy under consideration in the Comprehensive Plan Update that calls for expanding access to community gardens and incentivizing urban agriculture to improve food security and increase healthy food options.
100	"Transportation: your study shows people are unlikely to change their mode of transport so why is the city spending time and money changing the streets when the money may be better spent installing traffic cameras and enforcing traffic laws thereby reducing violations and accidents? One can remove parking spaces and add pedestrian/bike lanes and access to public transportation, individuals still have the right to drive and it is usually a significant time saver. (I can drive to downtown in 15-20 minutes or take the bus and spend 60-90 minutes-on travel time. My time is valuable). Until such time as we are forced to abandon driving, a reduction in available parking is most likely going to result in a decrease in traffic to the local businesses that isn't offset by an equal increase in other modes of transportation (not even those of less than 4 miles). Recommend the local college statistics and/or marketing class do a survey of the business owners located in areas where street changes have already occurred and share their results with the city and the public before any additional planned street improvements are undertaken. Parking: If you want more people downtown why did you remove free parking on weekends? Parking-the parking analysis states 'nearly half of city managed off street parking is unoccupied during the week day""-what % of the unoccupied parking is permit only parking? As for daytime vacant street parking-what % is near commercial vs residential? What percent if free vs metered? Parks: What is the city plan to address the current park deficit? Other than allow developers to acquire available areas, clear them and add buildings. Like we really and truly need a Lexus dealership (on Mill Plain) or an In and Out Burger at what may be seen as potentially the worst possible location (136th and Mill Plain ...136th and 4th would have been a bit better as it had the potential of moving traffic farther away from an already busy intersection. Education: compared to the state it appears our schools are not meeting the basic educational needs of our 9-12 grade students. We need to recognize the value of well educated and trained trades people vs the belief that a 4 year degree is the answer to everything. Consider arranging well planned field trips to community and state colleges, where the college students positively engage with k-12 students. The goal is to expose the younger people to future career possibilities and motivation to stay in school.	Comments noted. The transportation, parking, and education comments were reviewed and are outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. The comments reflect policy preferences rather than input on the sufficiency of the environmental review. Refer to the Public Services and Utilities section of Final EIS Chapter 3 for information about the City's planned approach for addressing parks needs under all alternatives. Refer to the Plants and Animals section of Final EIS Chapter 4 for more information about measures to meet the City's tree canopy goals. Refer to Common Response # 3: Car Dealerships

ID	Full comment	Response
	Tree canopy: the city states it cares for its trees yet the residents watch the developers clear cut parcel after parcel. Visually, the perspective is the city does not care to maintain any type of tree canopy. Actions speak louder that words. Yes, I have seen the educational signs on the trees in the parks. This is not enough to mitigate the impact of seeing trees and the understory clearcut for development. At minimum, require developers to include 100% PNW native flora in the landscape section of their development plans."	
101	I would like to see more affordable housing. I do not mean apartments or condos. As someone who has lived in Downtown for approximately 20 years the disaster of the "road improvements" throughout this area was grossly mishandled. The traffic has not improved only gotten worse. I cannot afford a house in the area as a single person who makes $100k+ which is ridiculous. I rent in Hough neighborhood which until recent has had a horrific issue with the homeless in the area including assaults, fires, theft and open drug use. I miss our quaint downtown, we are not Portland nor do we want to be. Along with the bridge issues and talks of tolls I am so disappointed in our government officials and city planners. I feel this city needs to catch up with the mess they've already made before planning anymore.	Comment noted. Refer to the Housing section of Final EIS Chapter 3 for a discussion of the potential effects of the Comprehensive Plan Update alternatives on housing diversity and supply, as well as proposed Comprehensive Plan policies to address impacts to housing and homeownership. Refer to Common Response #8: Housing affordability/options for more information. Refer to Common Response #15 Homelessness for more information on how the City is working to address homelessness.
102	I don't want to see any industrial development in my neighborhood or surrounding neighborhoods east of I-205, Mill Plain, Chkalov or Cascade Park area. There is so much traffic especially near I-205, it will further erode quality of life, increase noise and pollution. I would like to see more plants, trees, and esthetics like in Camas near 172nd that is visually appealing and even with traffic.	Comment noted. The Preferred Alternative proposes a mix of zones in the Fircrest and Cascade Park neighborhoods, including primarily Low-Scale and Medium-Scale Neighborhood and Mixed-Use. These zones do not allow industrial development. Refer to the Aesthetics, Noise and Transportation sections of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases and Climate; and Plants and Animals sections of Final EIS Chapter 4 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts.
103	We need more housing that is affordable relative to the wages of people living here and jobs available. We need more density. We need more living wage jobs and more services close to or in neighborhoods so that people can get the things they need to live (groceries, child care, work etc.)	Comment noted. Refer to the Housing section of Final EIS Chapter 3 for a discussion of the potential effects of the Comprehensive Plan Update alternatives on housing diversity and supply, as well as proposed Comprehensive Plan policies to address impacts to housing and homeownership. Refer to Common Response #8: Housing affordability/options and Common Response #10, Businesses in residential areas, for more information.
104	"To the Our Vancouver Planning Team, Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the OUR VANCOUVER Comprehensive Plan Update. I strongly support the City's vision of a vibrant, equitable, and economically resilient future — and believe that the Vancouver waterfront plays a critical role in achieving this. As a stakeholder interested in investing in the waterfront, I would like to encourage the following additions and policy considerations as part of the final plan: 1. Flexible Zoning for Alcohol Use & Mixed-Use Nightlife The waterfront should be formally recognized as a mixed-use hospitality zone that supports bars, restaurants, and social venues. I urge the City to: Ensure flexible zoning allowances for alcohol-serving establishments across Mixed-Use Neighborhoods and Regional Activity Centers. Clarify and expand permissible uses to include outdoor dining, rooftop patios, and entertainment spaces tied to nightlife culture. 2. Streamlined Liquor Licensing and Permitting To encourage responsible and timely business development, please consider: Establishing an expedited liquor license review process for businesses in key economic growth nodes like the waterfront. Creating a dedicated "Waterfront Business Express Lane" for hospitality-related permits, inspections, and approvals.	Comments noted. Your comments were reviewed and are outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Your suggestions were shared with City decisionmakers.

ID	Full comment	Response
	3. Targeted Tax Credits and Economic Incentives The waterfront will thrive with a balanced mix of residential and business investment. I recommend: Implementing business and residential tax credits specific to the waterfront area. Considering property tax abatements or startup-friendly tax incentives for new businesses that contribute to placemaking, job creation, or sustainable infrastructure. 4. Cultural District or Hospitality Overlay Zone A designated hospitality overlay or entertainment district would allow the City to: Support later operating hours, live music, and flexible outdoor uses. Reduce permitting friction for special events and seasonal programming. Enhance branding and tourism focused on food, beverage, arts, and riverside recreation. 5. Public Realm Enhancements Finally, please prioritize investments in: Decorative and safety lighting, clean public restrooms, and security partnerships to support a nightlife economy. Public infrastructure like parking decks, signage, and walkability to improve access for both visitors and residents. The waterfront represents one of Vancouver's most exciting opportunities for inclusive, experience-driven development. I hope you will consider these recommendations to make the process of building a business here more accessible, sustainable, and aligned with the City's growth targets. Sincerely, Carla Myers"	
105	"I own 2 parcels of land on St. John's and 44th street. A prime location coming. Parcel [parcel number] .61 acres zoned CC, [parcel number] .43 acres zoned R-22. Because of the small size and different zonings it makes finding a reasonable use case very difficult. I would like to have you discuss how you could make it easier for small businesses and land owners to develop small properties."	The Preferred Alternative would zone these parcels as Medium-Scale Neighborhood. Refer to the Our Vancouver 2045 website for more details about the updated zoning code and its potential effects on these parcels.
106	I'm very concerned about building higher density housing without changes to infrastructure such as widening roads. And as roads are worked on or neighborhoods are built, I think the city should invest more in putting utility lines underground. With power demands increasing, maintaining consistent access to power should be a priority.	Comment noted. Refer to the Transportation and Public Services and Utilities sections of Final EIS Chapter 3 for more information about potential impacts of the alternatives, as well as proposed measures to address these impacts.
107	Prefer Alternative 1, less dense than Alternative 2, also prefer more parks and natural areas. Prefer the less industrial next to the river, ie mixed use rather than heavy industrial.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. All alternatives would have similar amounts of land zoned as parks and natural areas.
108	"Since Vancouver annexed Cascade Park in the 90's Vancouver promised great things and delivered nothing. Currently the City can not take care of it citizens know and you have plans to annex Hazel Dell and Salmon creek, will turn into a disaster for both areas. This current group of city council and mayor jump from one grand project to another. Once it's done the neglect begins. Cascade park is a prime example, in that they will not listen to the citizens who live in the area and refuse to show any desire to do so.	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update.

ID	Full comment	Response
	Take care of the people who live in this citycurrently and if other areas petition and or vote to come into the city then fine, but to do a land grab is criminal and I do not support this at all."	
109	"I prefer Alternative #2. My general feedback on the alternatives is that I would like to see: - More residential and commercial density overall, with a focus on high quality and thoughtful design. - Increased prioritization of non-car use and transportation across the city, especially bicycle/transit infrastructure and repurposing the vast swaths of pavement currently devoted to parked cars. I would love for Vancouver to look back in 5 years and be able to say with confidence that our peak car era is behind us. Also, the trees in this town are spectacular. Alongside increasing density and multimodal transportation, I believe it would be both valuable and wise to preserve and improve our urban tree canopy."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Transportation section of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 identify improvements to active transportation infrastructure as proposed Comprehensive Plan policy measures. Refer to the Plants and Animals section of Final EIS Chapter 4 for more information about measures to meet the City's tree canopy goals.
110	Opposition to the city rezoning southcliff neighborhood, to include mill plain/oregon drive. The. city is establishing many new homes in the heights project and moving neighborhoods on E. Mill Plain will diminished the. natural habitat and established neighborhood and parks. The proposed plan puts housinging zoning above those proposed in the Town Plaza Heights project, is against southcliff long-standing restrictive covenants (since 1954) where homes can build adu unless attached tot he home, etc, obliterates the historical character, increases traffic, parking, and public safety to the neighborhood, and destroys the environmental requirements that they have put in place. Current residents are required to submit land use surveys, archeology surveys, engineering assessment, tree surveys and more to do construction in the area with limitations. I seems that the respect for the neighbor hood is not the city's role, but rather to diminish our neighbors quality of life with excess vehicle, excess homes, destruction of native habitats, etc. Our family feels that rather than rezoning southcliff as "mixed use neighborhood" it allow no commercial properties, focus on the heights project with the additional housing. If an assessment must be made - it would be more beneficial to allow the current neighborhood to build unattached ADU within zoning limits, which could include above garages, for generational living. Our family is strongly against the rezoning, but would support the additional option of allowing homeowners to build ADU as long as they can accommodate vehicles on their own property. Thank you.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
111	I am against the heights district project.	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update.
112	*Incomplete form, no comment received*	*N/A*
113	"August 15, 2025 Points to make for the consideration of the Vancouver city planners: Our family moved into Southcliff 20 years ago, putting us in the category of "newcomers" to this neighborhood. My husband and I raised our two children here. A number of our neighbors, many who have become friends, have lived here most of their lives. When this neighborhood was first established in the mid 1950s, CC&Rs were set into place with guidelines set up to maintain a sense of stability and safety, ensuring that property owners would be protected from divided lots or commercial endeavors. The original residents thought ahead all those years ago. They planted many trees, which today are 75-year-old giants, creating a beautiful canopy throughout the area. This is a wonderful, walkable area where, on the south side, grand homes rise on a bluff overlooking the Columbia River (a note: our family does not live in one of these). Our neighborhood is a spot where friends gather and chat, or get that morning walk in. Others walk their dogs, wheel their babies, bike, or play with their children in the park. Historic Southcliff is unique in a number of ways. In terms of its layout, this cluster of approximately 100 homes sits in a heart-shaped configuration, fed by three streets sort of like arteries, each of them entering from Mill Plain on its northern border. There is no back or side way into or out of Southcliff, as it is surrounded by ravines and cliffs that drop off sharply in an arc surrounding the neighborhood.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	If I understand the task at hand correctly, the Vancouver city planners are asked to envision both housing and business opportunities for something around 80,000 new residents in Vancouver over the next 20 years, certainly no small feat. And if I understand the proposed plan correctly as it relates to Southcliff, it would be to rezone the first block of properties, from Mill Plain inward to Oregon Drive, to be mixed-use high-rise commercial/residential buildings. Our entire neighborhood would be drastically impacted by this concept of high-rise commercial/residential buildings in a wide swath along our only entrances and exits at Mill Plain Blvd. These buildings would loom over the homes on that same street. It is hard to envision how traffic patterns would work with residents vying for space to enter or exit with a huge influx of condo residents, shoppers, and vehicles coming into and out of these three arteries onto a major thoroughfare. Historic Southcliff is a relatively short stretch along Mill Plain Blvd in the big picture of urban planning. It would not contribute a significant number of units, while creating a big problem for current and future residents to live with. Studies have shown that stable neighborhoods with a sense of history give back to their communities, creating connections in so many ways. I propose that your group take another look, using a scalpel instead of a wide-tipped marker, taking into account the ebb and flow of areas that are thriving and should be preserved. And I do believe this can be done while at the same time improving and developing the vast expanses of land along Mill Plain that can easily accommodate high rise housing and businesses, to great effect for the benefit of all these future residents, and for Vancouver as a whole. Thank you for taking the time to read this letter."	
114	"I believe our city should embrace a vision for growth centered on high-density, mixed-use neighborhoods (alternative 2). By concentrating housing, jobs, shops, and services close together, we can create walkable, vibrant districts where daily needs are within easy reach. This approach would reduce long car commutes, protect natural areas from sprawl, and give a boost to local businesses while fostering stronger community ties. If paired with thoughtfully designed public spaces, high-density development could offer both the vitality of a thriving city and the comfort of accessible green spaces. I also urge the city to make significant investments in parks, pedestrian and bike infrastructure, and robust public transit. Safe, connected bike lanes and walkways would allow people of all ages to travel without relying on cars, while reliable and frequent transit would ensure equitable access to jobs, education, and services. Parks woven into dense neighborhoods would not only provide recreation and beauty, but also help cool our city, clean our air, and bring neighbors together. By putting people and green space at the heart of our planning decisions, we can create a city that is dynamic, inclusive, and sustainable for the next twenty years and beyond."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Transportation section of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases, and Climate section of Final EIS Chapter 4 identify improvements to active transportation infrastructure and transit as proposed Comprehensive Plan policy measures. Refer to the Public Services and Utilities section of Final EIS Chapter 3 for information about the City's planned approach for addressing parks needs under all alternatives. Refer to the Plants and Animals section of Final EIS Chapter 4 for more information about measures to meet the City's tree canopy goals.
115	"Fishers Landing Rezoning Development along 164th will increase noise throughout the area . The rezoning of the area will ruin one of Vancouver's nicer neighborhoods."	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
116	"My spouse and I are concerned with the proposed zoning changes that will directly affect our neighborhood of Southcliff. Homes in Southcliff were built mainly in the 50's as a planned development. The proposed changes would conflict with our neighborhood covenants that were initially developed and approved by the city to preserve the nature of the neighborhood. The neighborhood is a treasure trove of mid-century modern and mid-century traditional homes. The proposed zoning changes would eventually destroy the character of the neighborhood. I would hope the city would want to preserve the uniqueness of our neighborhood and have it as an example of a midcentury developed neighborhood. Our neighborhood is highly desirable to own a home in, I would think the city would want to preserve it instead of making the entire city homogenous throughout.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Also, we are believers in planting trees and expanding the tree canopy. We have over 30 varieties of Japanese maples and numerous other trees. The changes to zoning would irreparably damage the tree canopy in the neighborhood which significantly adds to Vancouver's tree canopy. Also, why is the the height of buildings along mill plain in our neighborhood allowed to be taller than the new Heights Development. I believe the Heights Development could be higher density to help meet zoning density requirements. I am concerned with possible 8 story buildings in our neighborhood along Mill Plain. People would have to enter our neighborhood to access these buildings and where would people park? It would destroy our neighborhood as a quiet beautiful place to walk, live, grow old in. Thank you for the opportunity to comment."	
117	Please do not remove our sound wall. We need the sound wall along 164th (between highway 14 and 34th). It blocks the noise from the highway and from 164th. 2 extremely busy roads. It will negatively affect our wellbeing and property values!	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
118	"I am in favor of the no action option for the Fishers Landing area. This neighborhood was built in the 1980s and is a lovely neighborhood of single family homes. It should have value as a historic housing area. There are many commercial resources nearby without having them affect the housing area. I'm wondering why the VIC project doesn't fulfill the state mandates for more dense housing? There seems to be plenty of space available for more dense housing within the VIC without disturbing the single family neighborhood. I think both alternatives proposed would be more detrimental to this area with noise, crime and pollution. No action is the best option for Fishers Landing area."	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
119	I'm against the Rezoning of The Village subdivision in Fishers Landing area. The beauty of these homes and their gardens. We bought and live here for the beautiful yards we have. Let this area remain as is.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
120	I am strongly opposed to the scenarios being considered in the comprehensive plan concerning E Mill Plain Blvd and the long established Southcliff neighborhood. I have lived in Southcliff for over 40 years. This neighborhood was established over 70 years ago when the old WWII houses were removed. It is a heavily treed area and this project would result in significant tree canopy loss. The Town Plaza Regional Activity area is just a block away from our neighborhood that would include housing and retail with NO plans for parking of cars. Where will these cars park other than neighborhood streets? There should be no more housing and retail along this section of E Mill Plain Blvd. The proposed development would significantly affect the long established Southcliff neighborhood and cause massive parking and traffic problems for this area and the already approved but not yet built Tower Mall project.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
121	*Incomplete form, no comment received*	*N/A*
122	I think Clark County residents, and more specifically Vancouver residents are not going to adapt to public transportation despite the City' s efforts to force it on residents. Living in Fishers landing, we already have adapted to the airport noise, but the plan to change zoning could result in tearing down the cement noise barrier along SE 164th makes no sense, especially since they spent so much money and time to build a noise barrier along Highway 14. Next there is a huge plot of undeveloped land on the other side of 164, by the transit center that would seem to be prime for commercial and multi-use housing.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
123	Rezoning for mobile home parks	The Preferred Alternative includes a new zoning district, Manufactured Home Park, to preserve existing mobile home parks in Vancouver.
124	"Please keep the zoning at 164th and 34th street area, specifically the Villiage at Fisher's Landing zoned single family as it is now. Sincerely, Douglas L. Stutesman"	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
125	The rezoning of the Village at Fisher's Landing, would completely change the feeling and look of the Village. Leave it as is.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
126	*Incomplete form, no comment received*	*N/A*
127	Why would you change zoning on an established single family neighborhood to high density development? If I wanted to live next door to an apartment complex I would have done so. Instead you propose to ruin a safe, quiet, family oriented neighborhood. There are plenty of other areas where you can do so without ruining an existing neighborhood. I would really llike to hear a response, not just silence.	Comment noted. Refer to Common Response #12: Neighborhood Character.
128	I am TOTALLY opposed to the 2 scenarios presented that affect the Southcliff neighborhood in Vancouver. Why you have plans to destroy a lovely long established neighborhood is really hard to understand. This redevelopment will cause massive traffic problems, ruin the looks of the neighborhood and decrease property values. I was recently informed that the Tower Mall project will contain 1300 units with NO parking. Those residents will be parking all over our neighborhood and if that isn't bad enough you want to make Oregon drive retail? More parking and traffic problems! Not to mention that it will destroy our neighborhood! This beautiful neighborhood has been here since the 50's and should be left alone. It has abundant large trees which supply many benefits. They combat climate change, provide oxygen, save water, prevent water pollution to mention just a few of the benefits. Removing them would be a crime. Please don't ruin our long established neighborhood and why not do something to improve Downtown Vancouver instead. I was told that the city planners involved in this were from Portland. They've already made a huge mess of Portland and need to go back there!!!	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
129	Leave the sound wall on 164th alone or make it better. The noise of traffic and engines going up the hill is already loud for the homes along 164th. Also it's funny the city owns the property across the street and then wants to change what's existing on the side with the homes.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
130	*Incomplete form, no comment received*	*N/A*
131	*Incomplete form, no comment received*	*N/A*
132	"Re: ""Our Vancouver - Comprehensive Plan 2045"" 1. Why did the City single out the Southcliff neighborhood for the destructive zoning changes proposed in Alternative #1 and Alternative #2 with significant portions to be rezoned Mixed-Use and Medium Scale classifications? 2. Is the City proposing to rezone the neighborhood where Mayor Anne McEnerny-Ogle lives to allow commercial activity or for buildings five to eight stories high? 3. Is the City proposing to rezone the neighborhood where Mayor Pro Tem Erik Paulsen lives to allow commercial activity or for buildings five to eight stories high? 4. Is the City proposing to rezone the neighborhood where Council Member Sarah J. Fox lives to allow commercial activity or for buildings five to eight stories high? 5. Is the City proposing to rezone the neighborhood where Council Member Bart Hansen lives to allow commercial activity or for buildings five to eight stories high? 6. Is the City proposing to rezone the neighborhood where Council Member Kim D. Harless lives to allow commercial activity or for buildings five to eight stories high? 7. Is the City proposing to rezone the neighborhood where Council Member Diana H. Perez lives to allow commercial activity or for buildings five to eight stories high? 8. Is the City proposing to rezone the neighborhood where Council Member Ty Stober lives to allow commercial activity or for buildings five to eight stories high? 9. Which of the City's planners and development staff who were involved in the drafting of Alternatives 1 & 2 lives in the City of Vancouver?	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	10. Of the City planners and development staff who live in the City of Vancouver, is the City proposing to rezone the neighborhood where each of them lives to allow commercial activity or for buildings five to eight stories high?"	
133	"I am very concerned about the proposed zoning changes for the Village at Fishers Landing Neighborhood. We moved to this area for the quiet and tranquility and ease of access to services. We used to live in NE Portland, until our neighborhood was also rezoned and it became unbearable. The increased traffic, noise, pollution and crowds at grocery stores and local services detracted from everybody's quality of life. It also seems to me that there is plenty of new housing going in the area. Why ruin our neighborhood? If the zoning change is approved, we would consider moving to Camas or Ridgefield, again to find the quality of life we thought Vancouver was known for. Vancouver does need to be another Portland!"	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
134	Study the legislative history of House Bill 1110 passed in 2023. This Bill led to Vancouver's Comprehensive Plan Update. It is clear from a reading of the legislative history of this Bill that it only applies to subdivisions and neighborhoods with restrictive covenants addressing the number of homes on a single lot which are adopted after the effective date of this House Bill. Southcliff Neighborhood's CC&Rs were adopted in the mid-1950's and provides in part that "no building shall be erected, altered, placed or permitted to remain on any lot other than one detached single-family dwelling."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
135	"Hello, ""For these reasons we implore The City to take the No Action Alternative to maintain the character of the city that drew us here in the first place."" As a member of this community for the last 10 years, I am proud to call Vancouver my home. The character, people, and balanced amenities are truly beyond reproach. The desire to live in the Vancouver suburban community has clearly grown exponentially. With that, the repurposing of unused land and deprecated industry (decommissioned quarries, non-agricultural land, and dilapidated structures) into new mixed use areas has done the overall community well. What has fatigued the community including myself is the militant efforts to re-develop established and thriving areas. Creating additional noise, traffic, aggravated citizens, and negative environmental impact. In brief, the traffic, noise, and aggravated citizens are hand in hand. Speaking specifically of our area, the intersection of SE 164th Ave and Highway 14 entering the freeway is routinely backed up to the tune of 50+ vehicles and increasing. During just the last 6 years the aggravated honking and yelling has increased exponentially. There have even been instances of threatened violence observed. While public transportation in an option, the reality is the majority will still choose personal transportation. With the proposed growth in dwellings, it is all but certain to increase traffic to make the situation worse. Speaking for my family and those in our locale, we didn't move here to live in NYC / an agitated metropolitan. All of which has had my family and others highly considering leaving Clark County for areas that value what made this community great, Stability and Pride. For these reasons we implore The City to take the No Action Alternative to maintain the character of the city that drew us here in the first place. Thanks Mitch"	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
136	"Hello, ""For these reasons we implore The City to take the No Action Alternative to maintain the character of the city that drew us here in the first place."" As a member of this community for the last 10 years, I am proud to call Vancouver my home. The character, people, and balanced amenities are truly beyond reproach. The desire to live in the Vancouver suburban community has clearly grown exponentially. With that, the repurposing of unused land and deprecated industry (decommissioned quarries, non-agricultural land, and dilapidated structures) into new mixed use areas has done the overall community well. What has fatigued the community including myself is the militant efforts to re-develop established and thriving areas. Creating additional noise, traffic, aggravated citizens, and negative environmental impact. In brief, the traffic, noise, and aggravated citizens are hand in hand. Speaking specifically of our area, the intersection of SE 164th Ave and Highway 14 entering the freeway is routinely backed up to the tune of 50+ vehicles and increasing. During just the	Please refer to the response to Comment 135.

ID	Full comment	Response
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137	"Letter to City Council and City Planners regarding EIS for proposed Southcliff neighborhood zoning changes (Comprehensive Growth Plan). I am writing to ask that the Vancouver City Council choose the “No Action” alternative for Southcliff zoning. I have strongly supported the Heights District Plan/Regional Activity Center with the inclusion of low-income housing and commercial use. The Town Plaza area was distressed and deserted and, in my opinion, abandoned by the city for years while development focused elsewhere. I look forward to the new activity and diversity the development will bring to the area. And I would like the city to put its energy into completing the plan without so much delay. Contrary to this, I strongly oppose the new zoning plans Alternative 1 and 2 of the Comprehensive Growth Plan. Both would negatively affect the Southcliff neighborhood with commercial and high-density zoning along Mill Plain. I have lived in Southcliff since December 1992. I am one of the team that worked on the 2001 Southcliff Neighborhood Action Plan, and the proposed zoning plans would be counter to our NAP goals of preserving the environmental and community qualities of our little neighborhood. We are proud of our 47% tree canopy cover. The proposed high-density and commercial use would mean cutting trees and disturbing wildlife. Our mid-century development has no sidewalks, so our streets are our only walking paths. The increased traffic and parking needs would create danger for pedestrians and inhibit the community interaction and gathering. I am a believer in mixed-use development. I have seen good examples of this and bad ones. It is sad to see the well-intentioned idea of mixed-use eroded by the behemoth online retailers that dominate our current economy. When I see mixed-use areas around our neighborhood, I see tattoo or massage parlors, empty buildings with perpetual “for lease” signs, and a depressing rotation of failed shops. I believe the city planners and council need to acknowledge this reality and not set our neighborhood up for failure. I know the city council and planners will hear and read comments from many of the Southcliff neighbors about their opposition to the rezoning plans of Alternatives 1 and 2. Please choose the “No Action” option. Thank you, Patricia Douglass [address] Vancouver, Washington 98661"	Comment noted. Refer to Common Response #14 for the City’s response to comments about the Southcliff neighborhood.
138	"I've lived in the Village at Fishers Landing for 20 years after relocating from the Bay Area. We purchased our home here for the following reasons: beautiful, established homes and landscaping, nice lots for families, great schools, convenience to Highway 14, PDX & public transit if needed (the transit center is already very easy to get to as it stands). Rezoning this area would be a HUGE mistake and destroy this established neighborhood. There are plenty of other spaces around that the City should look at for this purpose (The VIC for example), not to mention all of the new high density housing already going up as well as apartment complexes that still have units available. To rezone SE 165th or this entire neighborhood is WRONG! Residents buy here for the same reasons I did.	Comment noted. Refer to Common Response #13 for the City’s response to comments about the Village at Fisher’s Landing neighborhood.

ID	Full comment	Response
	CONCERNS: noise and traffic increasing, increase in foot traffic for non-residents, increased crime, property vandalism, residents not feeling safe in their neighborhood, etc. I also don't feel that rezoning for mixed used to include commercial/industrial along with residential would be very aesthetically appealing by any means and would have a negative impact on property values. Please find another area in the City to concentrate your high density housing initiative. The Village at Fishers Landing is NOT the place. Thank you."	
139	"We are very concerned about the potential changes face by the Southcliff neighborhood likely to occur with the propposed zoning changes. We have lived in Southcliff for 35 years. We chose the neighborhood it was quiet, had lots of trees, little traffic, and friendly neighbors. We already face increased traffic and overflow parking with the development planned on the former Tower Mall property. Our house is on Oregon drive across the street from the lots where mixed use is proposed. Facing the back of business on Mill Plain along with increased traffic and many parked cars on our street would make this a very unpleasant place to live. People from in and outside Southcliff walk and bike on our streets. The increased traffic and parking would make this unsafe and unpleasant. We are also concerned that the water, sewer, electricity, and gas infrastructure might be unable to hand the increased load. Southcliff was planned as a quiet neighborhood of mid century homes with lots of trees and no through traffic. Please consider keeping changes to a minimum to preserve this gem of a neighborhood. Sincerely, Mary and Peter Eisenfeld"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
140	*Incomplete form, no comment received*	*N/A*
141	I would like to see more information available for affordable housing for senior	Comment noted. Refer to the Our Vancouver 2045 website for more details about the Comprehensive Plan Housing Chapter, which includes discussion of affordable housing for seniors.
143	The village at Fisher's Landing is an established single family neighborhood that will be negatively impacted by the proposed zoning changes. I moved here 20 years ago and raised my family in this house. I do not understand why anyone would consider ruining a beautiful neighborhood to create more housing. There is plenty of apartments along 164 and zero lot line condominium clusters near by. It creates nice diversity for the area. It does not all have to be dense living. Also, create a clean and efficient transit system and maybe more people will use it.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
144	We are very concerned about the road congestion and noise.	Comment noted. Refer to Common Response #4, Vehicle Traffic Impacts.
145	"I would like the Village at Fisher's Landing neighborhood to remain the same. Mixed-use development would change the safety and health of the existing neighborhood. The vacant land on the west side of 164th can be used for mixed-use development."	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood. The Preferred Alternative zones the land west of 164th near SR14 as Regional Activity Center.
146	One of the reasons I drive from east vancouver to downtown is to experience the small business shops. As a resident of the east, I've seen the development with increasing distress. While I love the idea of having more on the east side of town, all I'm seeing are luxury homes and big brand stores. As the east side developes, what I'd really like to see are mixed use buildings that provide housing and affordable rent for shops below. I'd love to be able to walk to different	Comment noted. The Preferred Alternative includes zoning for mixed use buildings on the east side of the city, as well as throughout central and west Vancouver. Refer to the Our Vancouver 2045 website for more details about the Comprehensive Plan Land Use Chapter, which includes discussion of mixed use buildings.

ID	Full comment	Response
	shops and restaurants, but I won't be exercising those lengths to support businesses that ultimately do not help Vancouver's residents.	
148	"I would like Vancouver to live up to its vision statement: as a city for ""all residents,"" offering ""quality of life"" and ""walkable neighborhoods,"" and ""address[ing] climate change."" Please make us proud of ""community well-being"" and ""community feel,"" with parks and open spaces and places for people to gather. Business and people CAN go together, as at Columbia Tech Center. By contrast, fast food construction and dealerships on Mill Plain are a terrible sight--using vast areas of land, with little or no community value. I fear the planning team has missed the mark. I know you're working hard for the future. You can do better!"	Comment noted. Refer to Common Response #2: General Growth and Quality of Life Concerns and Common Response #3: Car Dealerships
149	The Planning Commission should reject both Alternatives A and B which include commercial development and multi family buildings along SE 165th St. in the Village at Fisher's Landing. There can be no access to these establishments from SE 164th as the traffic is too heavy and access would require the destruction of the sound wall. The only access would be at 168th, the main entrance to the Village, and then along the now quiet residential streets. Having commercial, heavy residential development near mass transit is a good idea in theory but not when it requires disruption or destruction of a cohesive, long established, thriving neighborhood. Alternatives A & B remind me of Urban Renewal, a high flying theory of revitalization conceived in Washington D.C. which resulted in the destruction of long established neighborhoods, some of which as in Portland, are still vacant land. Residents suffered for a theory which didn't make sense on the ground. An allied point: mass transit ridership has plummeted since the Pandemic. This plummet would be a data source to review. There is much less need for dense residential development near a transit center. On the noise point: the sound wall around the Village should remain intact to protect the quality of life of Village residents. The Planning Commission should be in the business of protecting thriving neighborhoods not undermining them. We've lived in the Village since 1990 and served on a series of very active boards determined to protect the Village quality of life. We have succeeded in enforcing our CC&R's but it's almost impossible for individuals or even neighborhood boards to protect our homes and lifestyle from theories erroneously applied on the ground. In this instance, we depend on the pragmatic wishom of the Planning Commission. Thanks for listening.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
150	"I have been a resident of the Southcliff neighborhood for 27 years. Southcliff is a mature residential neighborhood, developed in the mid-1950's, and is characterized by a peaceful and inviting atmosphere. It includes a mix of families and older residents (of which I am one), mainly living in single-family homes that they own. The quality of life in Southcliff is unparalleled. Neighbors take pride in homeownership and take the time to get to know one another, fostering a strong sense of community and camaraderie. Our neighborhood park also offers residents opportunities for spontaneous, informal recreation and social engagement. Southcliff was meticulously planned and developed to be a community of single-family homes. Neighborhood CC&Rs have governed Southcliff since 1954. They were intentionally written to include guidelines to maintain a sense of long-term stability and safety, ensuring that property owners would be protected from divided lots or commercial endeavors. These goals are also reflected in Southcliff's 2001 Neighborhood Action Plan. In terms of physical layout, Southcliff is a secluded community of approximately 100 homes situated on cul-de-sac and crescent loop street types. Ingress and regress access is fed by three streets that connect to East Mill Plain Boulevard (the neighborhood's northern border). No thru-streets or major thoroughfares pass directly through the neighborhood. This unique street configuration is by design as the eastern, southern, and western borders of the neighborhood are either bound by a ravine (e.g., the Blandford Greenway) or cliffs with sharp drop-offs. This street layout effectively reduces vehicular traffic, as it primarily serves residents and their guests. Further, Southcliff 's streets have curbs but no sidewalks to easily accommodate walking and cycling and are well used for those activities. The original residents also made a thoughtful decision to plant trees to create a positive and lasting impact on both the environment and resident well-being. Today, Southcliff enjoys 47% tree canopy—well above city and neighborhood averages—which lowers air pollution, adds natural shade, and supports local wildlife.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	I acknowledge the exhaustive effort Vancouver city planners are making to update the city's Comprehensive Plan to guide the projected growth of approximately 80,000 new residents over the next 20 years. As applied to Southcliff, the proposed revision would overlay mixed use and medium density zoning along the East Mill Plain Boulevard northern boundary of the neighborhood, and inward to Oregon Drive. The proposed mixed-use development along the northern boundary of Southcliff will adversely impact our entire neighborhood. It also conflicts with the CC&R's that govern the neighborhood and our 2001 Action Plan. This designation is problematic in several ways: • Access Limitations: City planning staff have asserted that no access from Mill Plain is contemplated with this zoning redesignation because Mill Plain is a main arterial. Therefore, all traffic would need to access Mixed-Use buildings from the three neighborhood streets which feed from Mill Plain. • Parking Limitations: There are no minimum off-street parking requirements associated with the rezoning proposal. Concentrating multiple land uses in one area can lead to challenges in providing enough parking for all businesses and households on neighborhood streets. It also potentially causes traffic congestion and increased safety risks to those who use neighborhood streets for recreational activity. • Environmental Impacts: Bioretention systems recently installed as part of the Blandford Basin Stormwater Project will be inadequate to accommodate increased density. The neighborhood's tree canopy would also be compromised. • Noise: Because new buildings would face inward, residents, and particularly those who live on Oregon Drive, may experience added noise from commercial activities and increased traffic. • Impact of the Heights District Plan: The eastern boundary of Southcliff directly adjoins to the Heights District. Potential repercussions of the Heights Plan, now proposed as a Regional Activity Center, should be closely examined to assess and address additional impacts to Southcliff. In conclusion, Historic Southcliff extends across a short stretch along Mill Plain Boulevard, with limited potential for development. It would not contribute a significant number of housing and commercial units but would create significant challenges for current and future residents to manage. Studies have shown that stable neighborhoods with a sense of history give back to their communities. Living in Southcliff offers a unique quality of life that is not easily replicated in other neighborhoods and should be preserved. As an alternative to the proposed rezoning of Southcliff, I encourage city planners and council members to explore opportunities to improve and develop underutilized expanses of land along Mill Plain. For example, the Park Hill Center may easily accommodate high rise housing and commercial business. In so doing, the city can achieve its growth goals while respecting and preserving Southcliff's unique character, history, and quality of life for both current and future generations."	
151	"I have been a resident of the Southcliff neighborhood for 27 years. Southcliff is a mature residential neighborhood, developed in the mid-1950's, and is characterized by a peaceful and inviting atmosphere. It includes a mix of families and older residents (of which I am one), mainly living in single-family homes that they own. The quality of life in Southcliff is unparalleled. Neighbors take pride in homeownership and take the time to get to know one another, fostering a strong sense of community and camaraderie. Our neighborhood park also offers residents opportunities for spontaneous, informal recreation and social engagement. Southcliff was meticulously planned and developed to be a community of single-family homes. Neighborhood CC&Rs have governed Southcliff since 1954. They were intentionally written to include guidelines to maintain a sense of long-term stability and safety, ensuring that property owners would be protected from divided lots or commercial endeavors. These goals are also reflected in Southcliff's 2001 Neighborhood Action Plan. In terms of physical layout, Southcliff is a secluded community of approximately 100 homes situated on cul-de-sac and crescent loop street types. Ingress and regress access is fed by three streets that connect to East Mill Plain Boulevard (the neighborhood's northern border). No thru-streets or major thoroughfares pass directly through the neighborhood. This unique street configuration is by design as the eastern, southern, and western borders of the neighborhood are either bound by a ravine (e.g., the Blandford Greenway) or cliffs with sharp drop-offs. This street	Please refer to the response to Comment 150.

ID	Full comment	Response
	layout effectively reduces vehicular traffic, as it primarily serves residents and their guests. Further, Southcliff 's streets have curbs but no sidewalks to easily accommodate walking and cycling and are well used for those activities. The original residents also made a thoughtful decision to plant trees to create a positive and lasting impact on both the environment and resident well-being. Today, Southcliff enjoys 47% tree canopy—well above city and neighborhood averages—which lowers air pollution, adds natural shade, and supports local wildlife. I acknowledge the exhaustive effort Vancouver city planners are making to update the city's Comprehensive Plan to guide the projected growth of approximately 80,000 new residents over the next 20 years. As applied to Southcliff, the proposed revision would overlay mixed use and medium density zoning along the East Mill Plain Boulevard northern boundary of the neighborhood, and inward to Oregon Drive. The proposed mixed-use development along the northern boundary of Southcliff will adversely impact our entire neighborhood. It also conflicts with the CC&R's that govern the neighborhood and our 2001 Action Plan. This designation is problematic in several ways: • Access Limitations: City planning staff have asserted that no access from Mill Plain is contemplated with this zoning redesignation because Mill Plain is a main arterial. Therefore, all traffic would need to access Mixed-Use buildings from the three neighborhood streets which feed from Mill Plain. • Parking Limitations: There are no minimum off-street parking requirements associated with the rezoning proposal. Concentrating multiple land uses in one area can lead to challenges in providing enough parking for all businesses and households on neighborhood streets. It also potentially causes traffic congestion and increased safety risks to those who use neighborhood streets for recreational activity. • Environmental Impacts: Bioretention systems recently installed as part of the Blandford Basin Stormwater Project will be inadequate to accommodate increased density. The neighborhood's tree canopy would also be compromised. • Noise: Because new buildings would face inward, residents, and particularly those who live on Oregon Drive, may experience added noise from commercial activities and increased traffic. • Impact of the Heights District Plan: The eastern boundary of Southcliff directly adjoins to the Heights District. Potential repercussions of the Heights Plan, now proposed as a Regional Activity Center, should be closely examined to assess and address additional impacts to Southcliff. In conclusion, Historic Southcliff extends across a short stretch along Mill Plain Boulevard, with limited potential for development. It would not contribute a significant number of housing and commercial units but would create significant challenges for current and future residents to manage. Studies have shown that stable neighborhoods with a sense of history give back to their communities. Living in Southcliff offers a unique quality of life that is not easily replicated in other neighborhoods and should be preserved. As an alternative to the proposed rezoning of Southcliff, I encourage city planners and council members to explore opportunities to improve and develop underutilized expanses of land along Mill Plain. For example, the Park Hill Center may easily accommodate high rise housing and commercial business. In so doing, the city can achieve its growth goals while respecting and preserving Southcliff's unique character, history, and quality of life for both current and future generations."	
152	"My name is Margot Krissiep, and I have lived [address] in Southcliff since 1970—that's 55 years. We moved here because it is a pleasant traditional quiet neighborhood with streets wide enough to walk and bike safely for exercise. Traffic is very light and very few cars are parked on the street. Now our neighborhood is facing a substantial negative impact not only from the Heights District Plan (now Regional Activity Center), but also from the impact of the imposition of Mixed-Use and Medium-scale/Low-scale designations which would detrimentally change the quality of life for the residents and the character of our neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS, and I am opposed to both Alternatives 1 and 2 for the following reasons.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Traffic/Parking: It is highly unrealistic to assume there won't be at least one car per family or single adult. Using a bus is not always realistic and neither is riding a bike. I could get to work in under 10 minutes by car, whereas the bus would take over 45 minutes, assuming the 5 minute window for a transfer worked. The added cars mean a lot more noise and traffic in the neighborhood and no place to park except on the streets, which would already be impacted by people from the Tower Mall development looking for places to park their cars in the surrounding neighborhoods. Cars parked on both sides of the curved streets would make them more difficult for large vehicles like trash collectors, emergency vehicles, and trades people to navigate, especially in the cul-de-sacs. These parked cars and the significant increase in traffic will also create a safety hazard for pedestrians and bike riders. Mixed-Use: There is no ingress or egress from Mill Plain for these properties, which means all traffic associated with them would have to enter the neighborhood on three residential streets, none of which are through streets and one of which is a right turn only for both entrance and exit. Parking would saturate the residential streets especially considering the expected overflow from the Heights District/Regional Activity Center. Implementing any kind of pay-to-park at these establishments would impact residents and would likely encourage clientele to move to free on-street parking within the neighborhood. Stormwater runoff and Heat island effect: The increase in impervious surfaces and soil compaction would affect water infiltration and natural drainage patterns, and might prevent groundwater recharge. The increase in surface runoff would mean more opportunity for pollutants to travel to urban streams and cause erosion. It would also undermine the recently implemented Blandford Basin Stormwater Project to mitigate untreated runoff from the neighborhood's current density. Additionally, the loss of tree canopy, lawns, and gardens that support wildlife would increase the overall temperature and create another heat island. With the already warming climate this means using even more power during our increasingly warm summers. Both alternatives violate Southcliff's existing regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954, plus the 2001 Neighborhood Action Plan. It was my understanding that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. Southcliff is a an historic mid-century modern neighborhood that should be preserved as is and not destroyed by the City just to make room for people who might (or might not) move here by 2045"	
154	"To: Comments to the City of Vancouver, WA From: Raymond Maly, Southcliff Resident 1974 -1989 and then again 2006 – 2025 RE: Environmental Impact Statement (EIS) I attended the following meetings to become familiar with (EIS) and to understand the comprehensive plan required by Washington State to the City of Vancouver, reviewed every 10 years: July 28, 2025 - Southcliff Neighborhood Homeowner Meeting August 4, 2025 - Vancouver City Hall Meeting August 9, 2025 – Attended EIS Talk Session with Questions & Answers I learned about these proposed zoning changes as they relate to our Southcliff neighborhood: 1. Mixed-use Neighborhood (along Mill Plain Blvd) Could allow housing and commercial use, buildings 3-8 stories high. 2. Medium-scale Neighborhood (from E Mill Plain Blvd to Oregon Drive) – 2-5 stories high – up to 75 feet tall). Range of housing types: civic, institutional buildings and some commercial space. 3. Low-Scale Neighborhood (remainder of Southcliff)	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	I have deep concerns about this project, which could result in the destruction of the historic character of Southcliff, a neighborhood with a welcoming single-family character that makes Southcliff such a desirable place to live. My concerns include the following: Re: The proposed zoning changes: * This could be destroying the very nature of the place we live. * The proposed zoning changes directly violate Southcliff's long-standing covenants since 1954, updated in 2001, which allows for single-family residential use, and building heights of no more than 2 stories. * No zoning changes. The new adjacent town plaza (Heights district) contradicts the tenets to concentrate the greatest height and density in the commercial core. Re: Increase in the number of cars: * Would there be enough parking? Where would new parking come from? * Noise pollution - loud noises from cars speeding on Mill Plain and on Blandford, happening now, would only increase. * Car traffic jams, and noise, with limited entrances/exits into our neighborhood. * Automobile control –drivers using our streets to cut through to E. Mill Plain. * Reduced safety - in a potential emergency evacuation, exits blocked due to overcrowding ie: in a wildfire or earthquake. * It would be unsafe to use our streets for walks, biking, and other activities as we are currently doing. * Making these proposed zoning changes in Southcliff, without new access on Mill Plain, will funnel curvilinear residential streets including dead-ends & cul-de-sacs, creating parking issues & safety hazards for pedestrians & bicyclists caused by parking overflow from the zoning along Southcliff's Mill Plain entrances, as well as the new constructions in the Heights district. Re: Our comfort and privacy: * Potential loss of our personal property, reduced home value. * Inescapable light pollution from tall commercial buildings - bright lights left on at all hours from commercial and residential buildings, and their vehicles. * Loss of privacy - residents in high-rise buildings looking down on us in our private space, our backyards. * Management of commercial & residential garbage, attracting rodents. We would be looking at their mess."	
155	*Incomplete form, no comment received*	*N/A*
156	"My name is Rob Anderson, and I have lived at [address] in the Southcliff neighborhood since 1994. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. My reasons for opposing these alternatives are: 1. Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place and enforced since 1954.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	2. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. 3. I understood (and was very concerned) that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. 4. I moved to Southcliff for its quiet, walkable, bikeable streets and beautiful trees, privacy via large lots and wide streets. 5. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. 6. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating huge congestion on those streets not to mention safety issues for pedestrians and cyclists because there are no sidewalks. Southcliff is a a historic mid-century modern neighborhood that should be preserved as-is and not destroyed by the City just to make room for people who might (or might not) move here by 2045. Sincerely, Rob Anderson"	
156	I do not believe that you should change zoning of established neighborhoods- eg Southcliff or Dubois Park as you have done- Southcliff in both alternatives and Dubois Park in alternative 2. I guess alternative 1 is slightly better from the standpoint of my concern.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
157	"I am opposed to any rezoning of the Southcliff Neighborhood for an increase in density as proposed by Alternative #! and #2. The established covenants of the HA of Southcliff allows for a single family house per lot and only two stories and those regulations have been honored since 1954. The quiet established culture of Southcliff should not be sacrificed to increase density further with the HEIGHTS DISTRICT PLAN already in place and will contribute a solid contribution from this neighborhood to the housing and density needs of the city Zoning for commercial and mixed use would dramatically alter traffic and parking in Southcliff in a very negative way. The trees are now mature and contribute well to the overall canopy of the city and should not be sacrificed. There would be water and drainage issues for the Blandford watershed. There has already been a solid expenditure on this drainage that would be lost. The quiet culture of this neighborhood with wide and walkable streets should not be sacrificed for retail traffic and crowding with ongoing parking concerns. Southcliff is a contributing mid-century neighborhood that should not be re-zoned for light commercial and mixed use which would destroy the wonder of this quiet beautiful neighborhood. The contribution to density needs of the city for 2045 is already honored solidly by Southcliff with the Heights District Plan."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
158	"My name is Nancy Anderson, and I have lived [address] in the Southcliff neighborhood since 1994. I have spent many hours online reviewing documents/the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. My reasons for opposing these alternatives are: 1. Both alternatives violate Southcliff's coventants that only allow one single family dwelling per lot of no more than two stories high. These regulations have been in place and enforced since 1954.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	2. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would negatively affect mature trees and the loss of habitat for wildlife that is already impacted by the increase of population to our area. 3. My understanding of the Heights District redevelopment is the increase of commercial and mixed-use hi-rise buildings. This will already increase pressure on the area with additional cars and noise that goes along with adding people who will live, work or visit the development. 4. I moved to Southcliff specifically for it's spacious layout, quiet, walkable streets, mature landscapes and trees. 5. Adding commercial and mixed-use with no parking required would be hazardous to the neighborhood. We do not have sidewalks and most residents jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. 6. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating huge congestion on those streets not to mention safety issues for pedestrians and cyclists because there are no sidewalks. Southcliff is a a historic mid-century modern neighborhood that should be preserved as-is and not destroyed by the City just to make room for people who might (or might not) move here by 2045. Sincerely, Rob Anderson"	
159	"Comments to the City Planners, City Council and Mayor of Vancouver. My name is Anthony Haulk and I live at [address] in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. The two alternatives- Alternative 1 and Alternative 2 are not acceptable to me. I am against them. I am sure the City Planners can find a better way forward to comply with their mandates to plan for the future of Vancouver without destroying this neighborhood. Having participated in (and suffering the unintended consequences of) planning activities in the past, I know first-hand that well-intentioned but faulty planning leads to unintended consequences, often uncorrectable changes. This is especially true for zoning decisions. The proposed plans are entirely counter to the regulations this community has adhered to since it was planned and built in 1954. The wide, curving streets are walkways in addition to accommodating cyclists and automobile traffic. There are no sidewalks. Simply increasing the planned population density without adding infrastructure (sidewalks and crosswalks, increasing the amount of planned parking, improved storm drainage, and pollution mitigation) will lead to streets crowded with cars, pedestrian injuries, and an overall negative effect on residents' satisfaction. Increased building increases hardscape and decreases the tree canopy. Not a very "green" result. When we retired, my wife and I relocated from Southern Oregon to be near family. We searched for months to find a livable place. We found it in Southcliff. It has safe, quiet streets, a playground for our grandchildren to play. We knocked on doors and found the residents friendly and welcoming. We were told that the Southcliff Restrictive Covenants—created when this development was planned—limited development, so we could be assured that no one would build an apartment building next door. The placement of the homes on the curving streets was planned to allow privacy with the shades open. The homes are close enough to allow me to get to know my neighbors. The wide streets follow a curving path, discouraging speeding. There are no sidewalks. Our streets allow pedestrians, bicyclists and motor vehicles to co-exist. We don't need bike lanes for safety. This was for us a unique neighborhood, and that's why we purchased a home here. The proposed plan will allow building in such a way as to destroy our sense of community, privacy and safety. The proposed density for my neighborhood will encourage the highest possible density of housing. The homes with the best view of the river will soon be converted to high-rise, high-rent apartments blocking glimpses of the river and Portland across the river. The parking built will not be enough, and the overflow will crowd the streets. Now we will need sidewalks. Are there plans to build them? Where will that money come from? Where will my wife and I safely walk through the neighborhood? How will we visit with our neighbors? Increasing the density will require more hardscape. The storm run-off will puddle in the streets. The city has been working on that for some time and recently	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	placed a swale to cut the pollution in the drainage. Will that swale have to be expanded with the increased hardscape to support the increased density? This neighborhood keeps its cars off the street at night limiting the targets for car thieves. Will the off-street parking keep up with the residential building? Or will I be seeing smashed car windows and cars that have been robbed of their catalytic converters? The Southcliff development was planned and built for single family homes. People who bought homes here have agreed to abide by the Southcliff Restrictive Covenant so that we all can enjoy a safe and beautiful place to live. Encouraging the individual owners to break that covenant cheapens the environment for the other residents. The Height District redevelopment plan is manifested near my home as a chain link fenced area on Mill Plain. Weeds grow in much of it. There is a bicycle training area for children, which is admirable. Where is the touted high-rise housing and commercial development? We have been waiting for some development there since we moved in. Why not increase the planned density of that largely vacant area, instead of destroying the quality of our lives in Southcliff? Changing the zoning without providing for infrastructure will lead to a blighted area. Find another way. Sincerely, Anthony Haulk"	
161	I do not want to see more mixed use housing in existing neighborhoods. It would make our neighborhood noisier, more traffic and detracts from the landscape and livability of the community. Instead, in areas that are not already developed, it would be reasonable to add mixed use housing there with proper planning and resources to support mixed use communities. Please do not allow mixed use units in established areas that have limited current vacant space.	Comment noted. Refer to Common Response #4: Vehicle Traffic Impacts, Common Response #12: Neighborhood Character Refer to the Noise section of Final EIS Chapter 3 for more information on the potential impacts to this topic areas, as well as proposed measures to address those impacts.
162	"My name is Nancy Anderson, and I have lived at [address] in the Southcliff neighborhood since 1994. I have been online and reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. My reasons for opposing these alternatives are: 1. Both alternatives violate Southcliff's covenants and regulations which specifically assign one single family dwelling per lot of no more than two stories high. These regulations have been in place and enforced since 1954. 2. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would completely change the neighborhood's pleasing and open aesthetic, not to mention the loss of mature plants, trees and the habitat they provide for wildlife. 3. I understood that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. This development will already impact our neighborhood with more noise and congestion. 4. I moved to Southcliff because it was an established, well cared for, quiet, walkable neighborhood. The mature landscaping and beautiful trees offer privacy via large lots. 5. Adding commercial and mixed-use with no parking required into this established neighborhood - where there is no space for it - does not make sense. It would cause a lot of congestion. We do not have sidewalks in the neighborhood, but since the lots are large, most people are able to park in their garages and driveways which leaves the streets clear for safer walking. However, if the streets are jammed with cars parked on both sides it would no longer be safe for pedestrians and cyclists. In addition, with the Tower Mall development I am already concerned about additional traffic from folks parking in the neighborhood in order to access the services at Tower Mall. The Southcliff neighborhood is a historic mid-century modern community that should be preserved as-is. We have seen many original owners move on to more manageable living arrangements as they age, allowing the next generation of young families to move here to care for these homes and to raise their children in a safe community-centered neighborhood. I would like to see improvements to the already established mixed-use areas along Mill Plain	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	- from Andresen to SE 136th. Or along Fourth Plain. A well designed consolidation of businesses into structures with housing above, retail below - along with well designed green spaces - would be a huge improvement. I am hopeful that the city will see the wisdom of keeping our established and well-cared for neighborhood as is - and invest in the areas already designated as mixed-use that need it and would benefit from it. Sincerely, Nancy Anderson"	
163	"My name is Indigo Anderson and I have lived at [address] in the Southcliff neighborhood since 2002. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. My reasons for opposing these alternatives are: 1. Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place and enforced since 1954. 2. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. 3. I understood (and was very concerned) that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. 4. I moved to Southcliff for its quiet, walkable, bikeable streets and beautiful trees, privacy via large lots and wide streets. 5. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. 6. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating huge congestion on those streets not to mention safety issues for pedestrians and cyclists because there are no sidewalks. Southcliff is a a historic mid-century modern neighborhood that should be preserved as-is and not destroyed by the City just to make room for people who might (or might not) move here by 2045."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
164	"I oppose both of the City's Alternatives 1 and 2 with respect to our small South Cliff neighborhood for the following reasons. Cost: The City and/or the developers will incur significant costs to redo Mill Plain to accommodate commercial and high-density housing. Currently there are only two points where you can make a left turn off of Mill Plain into South Cliff when traveling westbound. Significant tree removal, median removal, etc. would be required to rectify this limited access. Historic Preservation: South Cliff was developed as a "Lady Bird" type neighborhood whereby the overhead power lines are in the backyards and not in the streets. This approach was taken in part to encourage interaction and socializing among the residents in the front of the homes. Also, if you come to our neighborhood you will notice there are no walls or fences in the front yards of any of the homes in South Cliff. The proposed changes in both Alternative 1 and Alternative 2 would destroy this unique character of the South Cliff neighborhood. Also, transforming portions of the neighborhood to commercial uses would cost more in our neighborhood relative to other neighborhoods that have a more standard electric power supply configuration (See Cost topic above). Conflict with South Cliff Restrictive Covenants and the 2001 Neighborhood Action Plan: Both Alternatives (not to mention the new state-mandated density prescribed by H.B. 1110) are in direct conflict with the longstanding South Cliff Restrictive Covenants and 2001 Neighborhood Action Plan. I live on Willamette Drive and I am very concerned about having future commercial businesses being accessed from Willamette Drive where currently young children	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	play in their front yards and at times in the street. I am concerned about my privacy and safety and the safety of adjacent families that live on Willamette Drive. Lack of Scale: I completely understand the need for additional affordable housing in our community. My question to the City is that for all the development and anticipated legal costs that will most likely be required to proceed with these concepts – is it worth it for such a small area? Questionable Market Need: Is there really any market need for commercial development with already having close access to services and businesses to both the west and east of us? Especially with the Heights Development on the horizon. Equity/Sharing the Load: The South Cliff residents are already going to be severely adversely impacted by the proposed Tower Mall redevelopment (Town Plaza, Regional Activity Center) in terms of increased traffic, noise and stress on parking that this development will cause. Why are we now being asked to shoulder even more heartache to our neighborhood which has been here since the 1950s? Safety: Most mixed use/commercial developments have much better access/egress from multiple directions. Due to the topography, South Cliff has very limited access/egress as it is hemmed in by the "Cliff" of course to the south and by an elementary school and power substation to the north. Also with regard to MLK Jr. Elementary school, how many mixed use developments with commercial businesses are directly across the street from an elementary school in our region or across the country? Will such an approach be safe for the children attending this school with this type of development that close? Consistent with my concerns, I concur with the points made by the South Cliff Neighborhood Association task force as well as what I have seen from other South Cliff residents who have submitted comments. My suggestion is that the City select the No-Action approach for South Cliff and focus your plans for additional commercial and housing density in areas where it would be more appropriate, less costly, have less adverse environmental & cultural impacts, and provide more benefits to the overall goals that the City and State are pursuing. For example, additional commercial development of the area along Mill Plain just west of Andresen could be incentivized by the City making much more financial, environmental and social sense for the community. Thank you for your consideration."	
165	"I prefer a hybrid option of alternatives 1 and 2 that concentrates mixed used/higher density residential/commercial development along corridors. I believe this would better reflect existing/current city plans. For example, in my neighborhood, the Evergreen and Grand Commercial Corridor Strategy was recently adopted in 2022. This strategy designated Grand and Evergreen Blvds for mixed use development, with the tallest buildings and most intensive commercial uses along grand compared to evergreen. The strategy did not call for changes to the land a block or more away from the corridor. Neither alternatives 1 or 2 quite captures this concept. Alternative 1 has medium density along evergreen and grand which wouldn't allow for the mixed use residential/commercial ideas called out in the Evergreen and Grand Commercial Corridor Strategy. Alternative 2 calls for mixed use all along all throughout the Hudson Bay neighborhood which includes Evergreen and Grand Blvds and the neighborhood blocks surrounding them. Neither alternative seems quite right. I recommend a hybrid of the two alternatives that calls for mixed use along evergreen and grand and low/medium residential a block or two away. For the grand central area, I prefer the mixed use as shown in alternative 2 vs the light industrial zoning as shown in alternative 1. Alternative 2 better reflects what is already built up in the area. There seems to be a mistake in alternative 1 in this area. It designates Hudson Bay High School, VITA elementary, and Memory/Mill park as mixed use development. These would stay schools/parks, right? And alternative 2 shows no colored overlay for these areas and they are labeled as a regional activity center. In general, I support more housing options and higher density/mixed use commercial along corridors all throughout Vancouver, a mix of alternatives 1 and 2.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative would include Mixed Use Neighborhood zoning in the area of Evergreen and Grand and some Medium Scale Neighborhood in select areas of this neighborhood. The Grand Central area is zoned for Industrial/Employment, more similar to Alternative 1. Hudsons Bay High School and VITA elementary are Regional Activity Center. Memory/Mill Park is zoned Parks. Refer to the Plants and Animals section of Final EIS Chapter 4 for more information on the potential impacts to trees, as well as proposed measures to address those impacts.

ID	Full comment	Response
	As we invite more housing density and housing choices in to Vancouver, please be mindful of setting goals/policies/development code that protects existing mature trees and requires planting of new trees. Please increase the required number of trees for all parking lots and required setback areas and increase the required planting strip size along roads to be 5-8 ft+. Require landscaping space that supports the largest maturing trees possible. Just like the City has a street tree list for different parking strip sizes and requires the largest appropriate trees to be planted from the list, develop the same type of list for parking lots and setbacks. Require that a wide area be provided for trees in setbacks and parking lots and then require that a large-maturing tree be planted. (Otherwise, developers will choose small-maturing trees to fulfill their tree planting obligation and this is a lost opportunity in an urban area with limited space for trees. As Vancouver grows up, literally upward, we need taller maturing trees in order to cast shade on upper levels of housing. We know trees provide air quality, climate, and human health benefits. To benefit people living in upper stories, we need to plant trees that can reach them. Also, imagine the difference in ecosystem services between a tree that matures at 25 ft tall and 20 ft wide vs a tree that matures at 75 ft tall and 50 ft wide! It only takes a few more feet on the ground to enable planting a tall maturing tree. Please plan space on the ground for tall, maturing trees to grow up and branch out over paved areas and give shade to tall buildings. As more residents build ADUs and other residential units on their properties, please provide outreach/education materials to help property owners design their additional units around their existing mature trees. Many of our backyards have beautiful, large mature trees that benefit the surrounding properties too. Adjusting development code, allowing variances, and providing resources for homeowners and architects to design around mature trees would be helpful for supporting new housing while protecting trees."	
166	"My name is Jennifer Small, and I live in the Southcliff neighborhood. I have been a resident of Southcliff since 1985. This neighborhood is not just where I grew up; it's where I've had the privilege of raising my own children. Southcliff is more than a place on a map; it's a community defined by its quiet streets, mature trees, and the sense of peace and belonging that comes from decades of thoughtful stewardship. I have reviewed the zoning change proposals being put forth in the City's Draft Environmental Impact Statement (DEIS), and I am strongly opposed to the adoption of both Alternative 1 and Alternative 2 as currently proposed. My reasons for opposing these alternatives include: • Violation of Longstanding Zoning Protections: Both alternatives contradict Southcliff's established CC&R, which have allowed for one single-family dwelling per lot of no more than two stories since 1954. These rules have preserved the character and integrity of our neighborhood for generations. • Loss of Mature Trees and Wildlife Habitat: Introducing commercial and mixed-use development would necessitate multi-story construction, resulting in the removal of mature trees and the destruction of critical habitat for local wildlife. These trees are not just aesthetic—they are ecological assets. • Misalignment with the Heights District Plan: The City previously designated the Heights District for commercial and mixed-use high-rise development, with carefully considered restrictions—including lower height limits than those now proposed for Southcliff under both Alternative 1 and Alternative 2. This discrepancy is not only inconsistent with the original Heights District vision, but it undermines the integrity of a plan that was more thoroughly vetted and aligned with community input. If additional density is needed, it should be directed to the Heights District, where infrastructure and zoning were intentionally designed to support it—not imposed on Southcliff, a neighborhood never intended to absorb such scale or intensity. • Traffic, Parking, and Safety Concerns: Southcliff's streets were designed for residential use. Adding commercial and mixed-use buildings without parking requirements would overwhelm our streets with parked cars, making them less walkable, noisier, and more dangerous for pedestrians and cyclists. • Environmental Impact on Rain Gardens and Runoff: Our neighborhood rain garden was engineered to handle runoff based on current traffic volumes. Increasing vehicle count and impervious surfaces would lead to more pollutants and runoff, undermining the garden's effectiveness and harming local water quality.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	• Preservation of Historic Character: Southcliff is a historic mid-century modern neighborhood. Its architectural and cultural identity deserves protection—not erasure—in the name of speculative population growth by 2045. I urge the City of Vancouver to reconsider these proposals and preserve the integrity of Southcliff. Thoughtful urban planning should honor the legacy of established neighborhoods while directing growth to areas already designated for higher density. Thank you for your time and consideration. Jennifer Small"	
167	"Bridget Marick & David Curran [address] Vancouver, WA 98661-5921 August 23, 2025 Meredith Herbst & Vancouver City Planners, City Hall PO Box 1995 Vancouver, WA Dear Ms. Herbst and Vancouver City Planners, My husband, David, are both medical professionals and we moved to Vancouver in November 2015. We did not want to live in Portland for several reasons. Therefore, we limited our search for a home to Camas and Vancouver. We looked at several properties including 13912 NE 7th Place in Vancouver which is a nice home. It was built in 1992 with a 3 car garage and everything one would think a home buyer would want. However, the back yard of this particular property butts up to duplexes and multi-family homes. We did not buy the house on 7th Place for that reason. David and I chose to buy a home in Southcliff because it is a beautiful neighborhood with larger lots and the majority of the homes are established and well maintained from the 1950's. Our home at 4310 Oregon Drive was built in 1957 by Bob and Wilma Dungan. They lived in this home for 30 years until they sold it to David and Kelly Christel. The Christels lived in this home for 28 years before my husband and I bought it in 2015. Like other houses in Southcliff, our home is well built by an individual, not a developer, which makes the entire neighborhood unique. Southcliff is not a cookie-cutter, put up over night, kind of a neighborhood. Because Southcliff is an older, established neighborhood, there is a large, mature tree population, which is another reason my husband and I love the neighborhood. With mature trees there are birds, including owls, and other wildlife, like deer, raccoon, and Opposum. You can catch a glimpse of them if you are up at the right time of early morning or night. Without a doubt, trees will be taken down to allow for mixed use, medium scale, and even low-scale development. With loss of mature trees comes loss of habitat and food for wildlife, especially birds. I will never forget the first time I saw a Western Tanager. It was perched way up high in a mature tree in my yard. The Western Tanager is a brightly colored and beautiful bird that breeds in Western US and Canada. It winters in Mexico and Central America. This bird relies on mature trees for habitat and food. Without these mature trees, the birds will be most affected. As outlined in the profile of the Southcliff Neighborhood City Plan of January 22, 2001, the shape of this neighborhood is dictated by topography rather than public roads. The boundaries of this place are made up of steep bluffs, hence the name and one can only access it by 3 streets: Rhododendron, Manzanita, and Umatilla. It is a small neighborhood with minimal access. Commercial development and high rise apartments would, without a doubt, impact traffic, parking, safety, and the uniqueness of the place. People seek out this neighborhood to walk, exercise their dogs, and teach their children how to ride a bike because the streets are safe and quiet. There is great history associated with Southcliff. It is the southwest corner of McLoughlin Heights which is one of 6 housing developments brought on by the influx of population to Vancouver sparked by WWII and Kaiser shipyards. Even back in 1945, when WWII ended, residents expressed concerns that the land of the housing developments would	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	be released, willy-nilly, to private investors. Their concerns were warranted because it would spell disaster to real estate values for private home owners in Vancouver. I am one of 10 children who was fortunate enough to go to college and earn a degree. My parents could not afford to pay for my college or help me buy a home. But, they taught me values such as working hard and earning my way. My husband and I are wage earners. We worked hard in order to pay for our home in Southcliff. I often worked two jobs. David and I are concerned that the mixed use plans have little regard for the small home owners whose life saving may be at stake. Do we want future generations to have an opportunity to purchase a home in and live in Southcliff? The answer is yes. But a home located adjacent to mixed use, combination housing, and commercial businesses in Southcliff is not what my husband and I currently have. We want to ensure future home owners of our property have the opportunity to buy it, as is, in the neighborhood as it currently is without tall apartment buildings and commercial influence. There are plenty of other locations to consider for housing development projects in and around Vancouver. It seems there is potential for developing the vacant lots near Winco on Andresen Road. There are Vacant lots along NE Vancouver Mall Drive. Perhaps better use could be made of the 23.22 acres that consists of Forth Plain Center. Maybe a deal could be arranged with Living Hope Church on Andresen Road for a mixed-use neighborhood. The old Tower Mall development is already underway. The City of Vancouver discontinued lease of the land for Vanco Golf Range for a Heights District Development project. Other golf courses such as Lakeview Par 3 Golf Challenge, The Cedars on Salmon Creek, and Hartwood in Brush Prairie are already being developed. Maybe sights could be set on Royal Oaks Golf Club for a housing development. I dare to wonder how the members of Royal Oaks would react to that type of plan. I dare even more to think of their reaction to plans for mixed-use housing in their very own neighborhoods. David and I feel blessed to have been able to buy our home in Southcliff and as such, we are stewards of this property and the neighborhood as a whole. We would not have chosen to move to Vancouver if there was no opportunity to buy a home in a neighborhood like we currently have. As honest stewards of Southcliff, we oppose the proposed comprehensive zoning plan. Sincerely, Bridget Marick & David Curran"	
168	"My wife and I are opposed to both alternative 1 and 2 as stated in the DEIS as it relates to the Southcliff Neighborhood. The Mixed-Use rezoning along East Mill Plain would drastically affect our neighborhood and the environment that makes this a desirable place to live. In reviewing the DEIS it's clearly stated that both alternative 1 and 2 will have significant negative impacts to our neighborhood by increased traffic count, increased noise pollution, increased water runoff due to increased impervious hard surfaces and decreased air quality. Another serious impact will be the reduction in overall Tree Canopy. See our letter submitted via email today to OurVancouver2045@cityofvancouver.us for a more complete description of why we are opposed to Alternative 1 and 2 as currently proposed. As my wife likes to say why change a neighborhood that's working well into one that isn't."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
169	"I would first like to say that I understand, fully, the challenge presented to the City of Vancouver relative to the need for additional housing and the need for more density in our county having been involved in local economic development for 50 years. Focusing on Economic development, one of the key attractions to employers when considering communities to expand or move their companies is whether there are neighborhoods to which they would want to relocate, and/or their senior management team would want to relocate. For the City of Vancouver, I consider Southcliff one of the few neighborhoods that our city has to offer that meets that standard (and the county for that matter). The proposed Alternative 1 and Alternative 2 overlays would literally destroy the value of Southcliff, in that regard, for most employers looking to bring jobs to our community.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Southcliff you may know, and as I understand others have shared, is a historic neighborhood, having been established by the Vancouver Housing Authority following World War II, creating a walkable, ungated community with well maintained homes and yards that literally become the poster for the city when working to attract employers to our city. Having invested in this neighborhood in 1985 to raise my family, it would be devastating for the city to lose a neighborhood so well maintained so close to the city center. Once the DEIS was published our neighborhood consulted our CCNRs as to whether these CCNRs or the new statutes brought forward by the legislature, and now these proposed overlays labeled Alternative 1 and Alternative 2, addressing density would govern Southcliff going forward. As I understand it, CCNRs have been found, in a court of law, to be the ultimate governing document. If that is true, then what is proposed in Alt 1 and Alt 2 would not be enforceable in our neighborhood. Additionally, both alternatives ignore current city codes regarding access to commercial property. The Southcliff neighborhood has only 3 points of access to our 110-home neighborhood. That means that if the currently proposed uses are approved and move forward that would force access to the commercial properties into our neighborhood and any multifamily development accompanying the commercial properties to park on the neighborhood streets, since current code in Vancouver, as I understand it includes minimal parking requirements for multifamily development, i.e., less than one space per unity for those located near a frequent transit line. Recently, the city has approved and is moving forward with the Heights District Plan which is literally a block east of Southcliff neighborhood. The density of the Heights District, having just been re-zoned to Regional Activity Center, has the flexibility to accommodate the increased density potential development within Southcliff and along Mill Plain Boulevard. While being a supporter of 'going up and not out', additional mixed use commercial along Mill Plain by rezoning the Southcliff neighborhood, I believe is not in the best interest of the City of Vancouver and suggest reconsideration focusing on the Heights District Plan as a way of addressing the opportunity for additional density."	
170	"August 25, 2025 Subject: Comment on Draft EIS – Vancouver Comprehensive Plan Update 2045 Dear City of Vancouver Planning Department, As a Southcliff resident for more than 40 years, I want to express my strong opposition to the proposed rezoning of our neighborhood under Alternatives 1 and 2 of the Draft Environmental Impact Statement (EIS). My family and I love this neighborhood and our neighbors, and we are deeply concerned that the proposed changes would irreversibly harm its character, safety, and livability. Southcliff is more than just a place to live — it is a community. Barbara runs in the neighborhood daily and values its quiet, safe streets. We also walk our grandchildren here, and many of our neighbors walk regularly as well. Increased traffic from high-density development would funnel onto narrow, curving residential streets that were never designed for such volumes, making them dangerous for pedestrians, runners, children, and seniors alike. The proposed zoning also conflicts with Southcliff's long-standing restrictive covenants and the 2001 Neighborhood Action Plan, which both protect single-family residential use. Allowing buildings up to 8 stories along Mill Plain and increased density throughout Southcliff is incompatible with our historic mid-century neighborhood character. Parking shortages, "strategic pricing" mechanisms, and loss of our 47% tree canopy would further diminish the quality of life that has made this neighborhood so special for generations. I urge the City to instead focus higher-density and mixed-use growth in the adjacent Town Plaza Regional Activity Center and along Mill Plain Boulevard's existing commercial areas. This approach would achieve housing and economic goals while protecting the unique history and character of Southcliff. Thank you for including my comment in the public record.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Sincerely, Don Roberts [address], Vancouver WA 98661"	
171	"August 25, 2025 Subject: Comment on Draft EIS – Vancouver Comprehensive Plan Update 2045 Dear City of Vancouver Planning Department, As a Southcliff resident for more than 40 years, I want to express my strong opposition to the proposed rezoning of our neighborhood under Alternatives 1 and 2 of the Draft Environmental Impact Statement (EIS). My family and I love this neighborhood and our neighbors, and we are deeply concerned that the proposed changes would irreversibly harm its character, safety, and livability. Southcliff is more than just a place to live — it is a community. We raised our four children here, and they learned to ride their bikes on these quiet, safe streets. I run in the neighborhood almost daily, and we walk our grandchildren along the same streets where our kids once played. Many of our neighbors also walk regularly, and the safety and walkability of our neighborhood is one of its greatest treasures. Increased traffic from high-density development would funnel onto narrow, curving residential streets that were never designed for such volumes, making them dangerous for children, pedestrians, runners, and seniors alike. The proposed zoning also conflicts with Southcliff's long-standing restrictive covenants and the 2001 Neighborhood Action Plan, which both protect single-family residential use. Allowing buildings up to 8 stories along Mill Plain and increased density throughout Southcliff is incompatible with our historic mid-century neighborhood character. Parking shortages, "strategic pricing" mechanisms, and the loss of our 47% tree canopy would further diminish the quality of life that has made this neighborhood so special for generations. I urge the City to instead focus higher-density and mixed-use growth in the adjacent Town Plaza Regional Activity Center and along Mill Plain Boulevard's existing commercial areas. This approach would achieve housing and economic goals while protecting the unique history and character of Southcliff. Thank you for including my comment in the public record. Sincerely, Barbara Roberts [address], Vancouver, WA 98661"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
172	"We are Con and Carol Kelleher and we have lived at [address] in the SouthCliff neighborhood for 50 years. We have reviewed the zoning change proposals being put forth in the City's Draft EIS and are strongly against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Our reasons for opposing these alternatives are: Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings and cause major parking problems and congestion in the entire neighborhood. This would completely destroy livability in Southcliff and cause a drop in our property values We understood that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, add it to the Heights plan and not to Southcliff."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
173	"My name is Maurene Leland and I live at [address] in the Southcliff neighborhood.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am strongly opposed to the adoption of both Alternative 1 and Alternative 2 as currently proposed as outlined in the following reasons: * Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. * Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. * It was my understanding that the Height District redevelopment was to be where commercial and mixed-use high-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. * We currently have walkable streets and no sidewalks. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable. Likewise, this additional congestion would cause safety issues for our pedestrians and cyclists. * Southcliff is a historic, mid-century modern neighborhood that should be preserved as is and not destroyed by the City just to accommodate the potential for people who may or may not move here by 2045."	
174	"I have been a resident of Southcliff for 16 years and have been residing at [address], a proposed Mixed-used lot, for 13 years. I chose to live in Southcliff, a well- established community, because of the historical aspect of the neighborhood - wider roads, well maintained homes, green and usable park, friendliness of the people and the quiet atmosphere. Southcliff has always been a desirable neighborhood. I understand the need for growth - affordable housing and more businesses to provide jobs. However, the proposed mapping of mixed-use along Mill Plain and the building high rise housing/duplexes on the interior of Southcliff will impact the whole neighbor. There will be more traffic - vehicles and people. A new development will affect the cleanliness, and the ability to keep the neighborhood safe - by adding more people with less regulations that Southcliff has established. Southcliff is a community that takes pride in their homes and is a respectful neighborhood. With the growth of the Heights Project, I already see an impact on traffic. I live along Mill Plain now and I do not have an impact from road noise, or people walking along the sidewalk. As more development comes, the outcome will be different. More people will be accessing Southcliff. If the homes along Mill Plain become Mixed-used - parking will be a problem. I believe there are other locations that mixed used properties can be developed. It is a shame to drive through Vancouver now and see so many warehouses or retail space empty for many years. These properties could be rezoned and made into affordable housing units instead of developing on existing owned, occupied properties. I do oppose the 20 year plan for redeveloping of Southcliff Neighborhood. Thank You."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
175	I would like to express that I have lived in Vancouver since 1965, my spouse and I have successful careers that take us to many parts of the world. I recently inherited my families 2 acre property at [address]. We have made a very concious and philanthropic choice to create an urban farm with the property my parents nurtured since 1960. Our "urban" farm is fostering a needed sense of community, providing nutritious vegetable and fruit choices close in. We are restoring the 1920's barn and 1941 home at the site. Although the plan is complex to the average lay person, Alternative 1 seems to be a much better choice for the Walnut Grove area that is currently made up of mixed housing and long time residents. Please do not implement Alternative 2. Please add our urban farm to your plans, the city is capitalizing on a 2 acre piece of property that provides for the community at our expense. We seek to do the right thing and not reep the benefits of development. Additionally we have interest in working with the city to ensure upon our death the farm continues to exist. Our plans are to move forward with the farm in partnership with the city for at least the next 20 Years of our life expectancy at which time it will move to our son for continued prosperity or gifting to a non profit organization.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
176	"August 24, 2025 From: Aaron and Katie Sutliff [address]	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Vancouver, WA 98661 To: The Honorable Mayor and City Councilmembers City of Vancouver Planning Department P.O. Box 1995 Vancouver, WA 98668 Subject: Formal Opposition to the ""OUR VANCOUVER Comprehensive Plan Update"" and its Impact on the Southcliff Neighborhood Dear Mayor Pollard, City Councilmembers, and Planning Department Staff, We are writing to you today as concerned parents and homeowners at 4615 Oregon Drive to formally state our opposition to the proposed Mixed-Use and Medium-Scale Neighborhood designations for the Southcliff neighborhood as outlined in Alternatives 1 and 2 of the Comprehensive Plan Update. As parents of three young sons who play daily on our streets and in Southcliff Park, our primary concern is the severe degradation of safety that this unwarranted upzoning would inevitably cause. While we support thoughtful, well-planned growth for Vancouver, the current proposal for our neighborhood is functionally flawed and dangerously overlooks the reality of how our community lives. An Unacceptable Threat to Child Safety Southcliff is a unique enclave designed with wide, curvilinear, non-through streets that naturally calm traffic, creating a safe environment where our sons and their friends can ride their bikes and play. The proposed high-density developments along Mill Plain Boulevard would shatter this sense of security. Since these developments would lack direct arterial access, all vehicle traffic—including delivery trucks and the cars of hundreds of new residents—would be funneled onto our quiet residential streets like Umatilla Way, Manzanita Way, and our own street, Oregon Drive. The city's own Draft Environmental Impact Statement (EIS) acknowledges that these alternatives will lead to ""higher projected new traffic volumes on city safety corridors"". For our children, this isn't an abstract statistic; it's a direct threat to their well-being every time they step out our front door. The Degradation of Southcliff Park and Family Recreation Our family, like many others, considers Southcliff Park an extension of our backyard. It is a vital community space for recreation and connection. The proposed increase in population density, without any corresponding plan for increased public amenities, will lead to overcrowding and overuse of this cherished 2.7-acre park. Furthermore, the inevitable overflow parking from new high-density housing will saturate the streets surrounding the park, making it more difficult and dangerous for families to access. Our 2001 Neighborhood Action Plan already highlighted the desire to improve the park's appearance and amenities; this proposal would actively degrade its accessibility and safety. Conflicts with Covenants and Neighborhood Character Beyond safety and park access, the proposed high-density zoning directly conflicts with the established covenants and architectural guidelines that have carefully preserved Southcliff's unique mid-century modern character and charm since the 1950s. These covenants were put in place by residents to ensure harmonious development and maintain the aesthetic integrity of our community. Introducing mixed-use and medium-scale designations disregards the very principles that have shaped our neighborhood's identity and created the desirable living environment we now cherish. A Better, More Responsible Path to Growth	

ID	Full comment	Response
	We believe the city can and must meet its growth targets without sacrificing the safety and character of established neighborhoods. We urge you to consider a more logical and sustainable approach: Concentrate Density Where It Belongs: Focus the highest-density Mixed-Use and Medium-Scale developments within the core of the Heights District and other designated urban centers that are already equipped with the necessary infrastructure. This aligns with the city's goal to ""promote efficient land use by focusing new development in areas with existing infrastructure"". Implement Step-Down Zoning: Where new density does approach existing neighborhoods, mandate strict transitional height and scale limits. This ""step-down"" approach would create a buffer and ensure that new development is compatible with the established single-family character of communities like Southcliff. Prioritize Redevelopment of Underutilized Commercial Lots: Encourage and incentivize the redevelopment of vacant or underperforming commercial properties that already exist along major corridors. This is a far more sustainable path to growth than destroying the green space and character of stable residential areas. Formal Request The proposed high-density overlays for Southcliff are not just incompatible with our neighborhood's historical mid-century modern character; they are a direct threat to our children's safety and our family's quality of life. Therefore, we formally request that the City Council and Planning Department completely remove the Mixed-Use and Medium-Scale Neighborhood designations from all parcels within the Southcliff neighborhood in the final version of the Comprehensive Plan. We ask you to please prioritize the safety of our children and the preservation of our community over a one-size-fits-all approach to density. Thank you for your consideration. Sincerely, Aaron and Katie Sutliff"	
177	"Given the resources available to use, it would be very smart to allow developers to propose parking off street with parking studies during the development process. Having developed properties in Portland, OR for many years, seeing people move away from owning cars and utilizing more services that have become available for transportation I see the need for less cars parked. The trade off is encouraging developers to design nicer buildings. The developers always have the ability to design for parking but the requirement I believe should be available and not so hardly mandated. I have built buidlings where I have incorporated lobby's, co working spaces that double as a space to wait for the uber to arrive when they order their ride and seen that work successfully in a few properties. I would like the City of Vancouver to consider adopting this in the future. As automation becomes available and ride sharing this is a huge upside in development. Also helps build up walkable neighborhoods as the businesses see the need to open in areas with more people living in them. In the neighborhood development it creates a better atmosphere than if you were to have a couple large parking lots."	Comment noted. Refer to Common Response #6 Vehicle Parking, Common Response #4: Vehicle Traffic Impacts and Common Response #10: Businesses in Residential Zones.
178	We bought our house because of the zoning and being NOT high density. I understand that a project that will change the zoning to allow high density development is on the books for vacant land on Esther St near	Comment noted. The Final EIS evaluates proposed zoning changes and their impacts in Chapter 3: Land and Shoreline Use and Chapter 3: Housing. Concerns about neighborhood compatibility and the transition from lower-density to higher-density zoning are acknowledged. Refer to Common Response #2: General Growth and Quality of Life Concerns.
179	"To Whom it may concern, I have lived in the Southcliff neighborhood for over 17 years. I have Parkinson's Disease and depend on the easily walkable and safe streets for my daily therapy. I am horrified by the proposed zoning changes to our iconic neighborhood.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	I worked my entire adult life to be able to live in just such a neighborhood. Before buying, I familiarized myself with the applicable zoning laws and CC and R's, which clearly restricted our neighborhood to single family dwellings of no more than two stories. Purchasing a home is one of the most consequential decisions of one's life. In order to make a qualified choice, one needs to be able to count on the consistency of rules and regulations. Two alternatives have been proposed, both unacceptable. If either of these proposals are executed, it won't just compromise the livability of our unique neighborhood, it will destroy it. I understand the push towards higher density land use in Vancouver and, while it negatively impacts our neighborhood, the Heights project is an appropriate and common sense compromise. Aside from being patently unjust, the proposed zoning changes would be a mistake which could harm the entire community. Vancouver needs to protect, not destroy neighborhoods such as Southcliff. They give our fine city personality. I implore all involved to reconsider the proposed dismantling of one of the most iconic historical neighborhoods in Vancouver and direct your energy towards maximizing the efficacy of the Heights project and the like. Thank you and kind regards, David and Kat Moore"	
180	"I support the ""Alternative 2"" map for future city planning. I think that denser, more mixed-use, space will keep the city more affordable and make it more vibrant as we attracted new residents and businesses to the area. I would also like to comment that we do not have enough food cart pods in Vancouver. I wish that we could relax zoning and regulations to allow more pod cart pods to establish themselves here so that we can grow our own local food scene instead of commuting into Portland to eat. Lastly, I think completing our neighborhood sidewalks it a more valuable goal than the city has given it credit for so far. In the Lincoln neighborhood, I can rarely walk more than 1-2 blocks without crossing the street and it becomes a game of Frogger where we have to jog across the street watching for cars every block or two when all we're trying to do is take a stroll in our neighborhood. The fragments of disconnected sidewalk throughout Lincoln and some other neighborhoods of Vancouver is both ugly and unsafe. Complete sidewalks would improve community and attract more residents to the area. Thank you for working hard for our city!"	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Final EIS also acknowledges the importance of supporting local businesses and food access. While food cart pods are not specifically addressed, mixed-use zoning and reduced regulatory barriers are intended to expand opportunities for neighborhood-serving businesses, including small-scale food vendors, consistent with Comprehensive Plan goals to improve access to grocery stores and dining options. Refer to Common Response #5: Traffic Safety and Common Response #7: Sidewalks for more information on those topics.
181	"GENERAL COMMENTS: Over the nearly thirty years that my family and I have lived in Vancouver, I participated in an advisory capacity on several public projects, some of which included the Columbia Crossing project, and the advisory group that centered around the upgrading of Vancouver's public transportation system. I mention this only to demonstrate that I am concerned about the future of Vancouver for not only my wife and me, but for future generations as well. I am quite sure that planning staff believes that the timeline that is described in the section on Scoping Process that begins on page 7 is generous. I disagree, and, I should add, so do a number of my neighbors and friends who reside in the city. My wife and I consider ourselves to be relatively well-informed, but we were quite surprised to learn of this project less than a month ago from acquaintances who live in an adjoining neighborhood. Indeed, had it not been for that conversation, we would not have know about the workshops that were just held. The reason for this, in my opinion, is that time and time again the city's outreach relies more often on electronic means than on printed materials that are delivered to residents and property owners by mail. I perfectly understand the economics, but the electronic process leaves out a large number of individuals who have a stake in the city's future. That said, once someone is on the email list, communications are much better ..... provided that an individual has email access, and, equally important, the time to process the large volume of information that must be researched and digested to make an informed decision. I suggest that the timeline for comments be extended for at least two months and that a mailing program be instituted as soon as possible to inform and guide residents. More workshops would be a great help if staff wants to really engage residents.	Comment noted. Refer to Common Response #1: Selection of Preferred Alternative, Common Response #6: Vehicle Parking, Common Response #8: Housing Affordability/Options, Common Response #10: Businesses in Residential Zones and Common Response #4: Vehicle Traffic Impacts for more details on these topics. The Final EIS acknowledges the importance of meaningful public engagement and transparency in the planning process. Outreach efforts are described in Chapter 1: Introduction and Scoping Process, Appendix D of the Final EIS, and in the appendix of the proposed Comprehensive Plan. Outreach has been conducted since 2023 and included a wide variety of methods, including in-person and print/hardcopy methods. The City recognizes that not all community members have access to digital tools, so voicemail and mailed comments were also accepted and recorded. Land and shoreline use impacts are addressed in Final EIS Chapter 3: Land and Shoreline Use. The plan emphasizes mixed-use development near transit corridors and centers, Public spaces, parks, and river access are prioritized, with policies to preserve and expand open space and ensure equitable access to the Columbia River. Housing capacity and impacts are analyzed in Final EIS Chapter 3: Housing. The Final EIS acknowledges concerns about neighborhood compatibility, gentrification, and affordability. State law requires that all neighborhoods allow a broader range of housing types, while emphasizes design standards, tree preservation, and infrastructure improvements to maintain livability. Compact growth is intended to reduce housing costs, expand options for families and seniors, and support climate and equity goals.

ID	Full comment	Response
	I realize that state mandates are driving much of what city planners are trying to accommodate, but we must be constantly mindful of the real capacity for growth that exists within the city's boundaries. Estimates must be carefully—and conservatively—calculated. I believe the worst mistake communities can make is to constantly plan for a level of growth that the taxpayer and the physical geographic boundaries cannot sustain. Otherwise, the tendency to build to an erroneous perceived capacity might well ruin our city. In closing, I should also point out that during my long career I have learned all too well that in these types of projects most often suffer from several problems, the most serious being that all of us do not know what we do not know, and that often individuals in all roles forget the consequences of trying to make conditions or solutions better, a word that, to paraphrase Voltaire, is the enemy of good enough. The comments below relate to the subjects listed in the survey. ALTERNATIVES: The suggested alternatives are well presented. My only comment on them is that the final preferred alternative should be arrived at by using accurate data and realistic assumptions derived from real-world experience. After all, it will be the taxpayers who will end up paying for all of the services, so be realistic and remain aware that growth must be approached with an open mind and a tight fist on the purse. LAND AND SHORELINE USE: The existing Comprehensive Plan for the city has many laudable goals, such as "[tailoring] regulations, incentives and investments to facilitate development and community resources near current and future transit stations" and "[incentivizing] and [removing] regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods." These should be adopted wherever there are areas of residential units that are not served by large grocery stores within reasonable walking distance. Small grocery stores can be located in new high-density mixed-use projects. Re: outdoor public spaces, it is crucial that Vancouver's public areas remain as they are or be expanded (e.g., designing neighborhood parks into new neighborhoods as they are being renewed). The number of open spaces, parks, and forests are very much a part of why many people choose to live in the city. The proximity to the Columbia River is equally compelling, and careful planning for housing and industry must ensure that the flavor of the city not be tainted in an attempt to find solutions to problems that do not exist. The public must not lose their access to the river, so, again, maintaining or creating public spaces must be accomplished. The redevelopment of the downtown property along the river is a welcome addition, but as has been happening here and elsewhere throughout the nation, this area—like the Pearl District in Portland—has become so gentrified that almost none of the local workforce will be able to afford living there. HOUSING: My wife and I had a lengthy conversation on this subject with a staffer at the 9 August workshop at City Hall. Having lived in large cities, very small towns, and areas known for outdoor recreation, we have a very good idea of the problems associated with gentrification and the rising costs of housing in all types of communities here and abroad, including those fueled by agriculture and outdoor recreation. Changing zoning in established neighborhoods to multi-use or higher density is fraught with problems, beginning with the fact that people choose to live where they do for specific reasons, chief among them cost, location, and ambiance. More important, however, is the quality of life that a place offers. In my particular case, when my wife and I began searching for a house, we looked from the Columbia River north to Woodland, east to Hockinson and Washougal and just about everywhere in between. After dozens of trips, we settled on a neighborhood with all of the things we were looking for: a quiet established neighborhood with wide, walkable, meandering streets, proximity to an airport, large trees, and good schools for our then high-school-age daughter. Coming from Florida, where real estate was relatively inexpensive back then, the prices of houses here were somewhat shocking, but we stretched a bit and found the house we still own and love. Under the proposed zoning, our neighborhood has a good change of being adversely affected on a number of levels. When I look at the published alternatives, I believe that in many cases, these proposed changes are based on erroneous assumptions. As an example, proposed changes on one street of residential housing that has no on-street parking on a bordering arterial street, would require parking be increased on the residential side of the property. This,	Seismic safety and geotechnical considerations are addressed in Final EIS Chapter 3: Geology and Soils, with requirements for site-specific review during permitting. Aesthetics and greenspace preservation are addressed in Final EIS Chapter 3: Vegetation and Wildlife, Chapter 3: Aesthetics, and Chapter 3: Land and Shoreline Use. The Comprehensive Plan emphasizes tree canopy preservation, landscaping requirements, and integration of parks and open space into new development. Architectural design review and context-sensitive standards are identified as tools to ensure compatibility with existing neighborhoods and public spaces. Historic and cultural preservation is addressed in Final EIS Chapter 3: Historic and Cultural Resources. The Final EIS recognizes Vancouver's rich history and emphasizes protection of key sites such as the Historic Reserve, Pearson Field, and Officer's Row. Adaptive reuse and modernization are supported where appropriate to maintain historic structures while ensuring their long-term viability. Refer to the Noise section in Final EIS Chapter 3 for more details on impacts and analysis. Public services and utilities are addressed in Final EIS Chapter 3: Public Services and Utilities. The Final EIS evaluates the fiscal impacts of growth on police, fire, schools, and other services, noting that compact growth reduces per-capita service costs compared to sprawl. Natural environment concerns are addressed across several chapters. Final EIS Chapter 3: Geology and Final EIS Soils and Chapter 3: Surface Water and Groundwater evaluate erosion, impervious surfaces, and runoff impacts, with mitigation measures such as stormwater management, erosion control, and low-impact development standards. Final EIS Chapter 4: Air Quality, Greenhouse Gases and Climate analyzes emissions, noting that compact growth and expanded transit reduce greenhouse gases compared to the No Action Alternative. Water quality concerns are addressed in Final EIS Chapter 3: Surface Water and Groundwater, with requirements for construction best management practices to protect creeks and aquifers. Drinking water supply is evaluated, with coordination planned to ensure long-term capacity. Plants and animals are addressed in Final EIS Chapter 3: Vegetation and Wildlife. The Final EIS emphasizes preservation of green spaces, wildlife corridors, and tree canopy. Compact growth is intended to reduce sprawl and protect natural areas, while tree replacement and landscaping requirements mitigate canopy loss. The importance of neighborhood tree canopy, including in Southcliff and other areas, is acknowledged as critical to air quality, climate resilience, and livability.

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	in turn, would increase the need for on-street parking in the affected neighborhood and would likely reduce the value of any adjoining residences, including those on the opposite side of the street. Vancouver has been popular for its compact, diverse neighborhoods, many of which can boast of having two and three generations of the same families in residence. Changing the flavor of many of these neighborhoods would be highly unfortunate and, based on history, will do nothing but result in lawsuits and disruption. I believe a better solution would be to take a detailed look at the design of the individual areas to identify, for example, whether a particular neighborhood would benefit from being allowed to build small-scale multi-story structures versus single-story residences or commercial spaces. This should be done with the involvement of property owners, many of whom have a greater knowledge of the neighborhood's history, day-to-day workings and aspirations of its residents. Vancouver should endeavor to adopt a measure that will demand that new high-density housing have a certain percentage of units reserved for the local workforce. This kind of rule is being instituted in several cities, including Riviera Beach, Florida, where, without safeguards in place, the commercial waterfront redevelopment would have resulted in apartments selling for many millions of dollars (each) on land that, prior to development, was mostly shacks and small, single-story commercial buildings. Instead, small businesses can be accommodated in multi-use developments, such as the one being planned for the old Tower Mall property. Small businesses can be accommodated on the ground floor with office and/or residential spaces on the two or three floors above. In almost all cases, new projects of this kind should require underground parking to reduce the amount of non-permeable pavement for parking (residential, commercial, customer, etc.) while reducing large quantities of stormwater runoff and allowing more open greenspace and the planting of a greater number of shade trees to reduce heat gain and conserve power consumption in residences and places of business. The belief that turning a block or two of residential property into mixed use, expecting that residents will gladly give up the flavor of their neighborhood for the convenience of having a small shop across the street, is not valid, especially if, as in the case of the Tower Mall Project, spaces for those kinds of businesses are only a few blocks away—easy walking distance and well within the guidelines of the "20-minute rule"—from neighborhoods bordering Mill Plain, MacArthur and other busy streets. It is a fact that our city needs small businesses, especially if they provide services like tailoring, shoe repair and, other trades that allow residents to save money by not having to replace items that could have a longer service life. These businesses, in theory, would also provide jobs. The key to this is the cost of rent. A tailor or cobbler cannot afford to sign an exorbitant lease, so if these types of businesses are desired, there needs to be some kind of rent control to help sustain them. To add more affordable housing, increasing the density would be essential. The questions are How? And Where? I suggest that consideration be made to amend the building code to allow high density housing in the form of three to four story apartment buildings to replace the often-vacant parking spaces that rim the parking lots in developed areas like the Vancouver Mall. These kinds of projects could be public/private enterprises that could stimulate increased availability for affordable condominium residences or workforce rentals. Requiring multi-story parking structures (in addition to underground parking), would reduce the deleterious effects of large expanses of blacktop. There is no question that seismic concerns enter into the calculus, but this is an obstacle that can be overcome and must be for all new construction in the city. AESTHETICS: A common thread that weaves the various parts of town together is greenspace. In the more established parts of town, large trees and mature plants grace our neighborhoods, our historic areas and our many parks and greenways. And while there are various types of houses and commercial spaces, we must plan for the future by preserving the old while embracing the new. This requires proper review, and by this I mean architectural design review, and specific guidelines that become mandatory for architects, builders and developers. Surroundings and existing structures and public spaces must always be considered when planning for newbuilds. Context is important, because to ignore it would be disastrous. Historic and Cultural Preservation: Vancouver has a rich history. There are reminders everywhere, and we need to not only preserve them, but remind our current residents and teach our visitors—about what our forebears accomplished. Preservation of the Historic Reserve, Pearson Field, the county historical museum and other important sites should continue and remain untouched, except in such cases as Officer's Row, where interior modernization to allow the	

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	structures to help pay for their own maintenance, and Pearson Field, where its status as an enterprise fund allows the facility to operate without taxpayer funding. TRANSPORTATION: I have commented a bit on this subject in the housing section, because the two are closely related. In addition, I believe that assumptions are being made by staff that are not valid. It appears to me that the assumption is that more and more people will be using the bus system and bicycles to travel around the city. I do not believe that to be correct … yet. Having grown up in two cities in New England, I grew up using public transportation, support it, and use it to this day. Wherever I travel, I use public transportation as much as possible. Until such time as the bus system has become fully built-out and more accommodating, many residents will choose alternative forms of transportation. The public transportation system in Vancouver is quite young and quite simplistic in comparison to systems elsewhere. We have no subways, no light rail, and very few feeder lines on our existing bus routes. And although taxis and rideshare companies provide alternatives to the personal automobile, their cost is generally far more expensive than the cost of the same trip by bus. To increase ridership, interconnectivity between The Vine lines must be expanded to allow bus and light rail users to easier access commercial and residential areas around town. This is crucial for the elderly, the handicapped, and commuters. Since moving here, I have witnessed a rise in the number of personal cars on the roads. There are at least two reasons for this: First, on the West Coast, perhaps more than elsewhere, people are closely linked to their cars. It is a cultural phenomenon. Second, having not grown up in areas with robust public transportation systems, people in this area are not fans of public transportation. Consistently, resident have voted against light rail in defense of their automobiles. Many, for what I believe to be selfish reasons, still do not want light rail to expand into Vancouver. Poor decisions based on these and other assumptions will come back to haunt us as we plan for the future. Take, for example, the redesign of some of our streets. Mill Plain Boulevard is a good example of what might happen. A number of years ago, a decision was made by the city to remove one traffic lane on each side of MacArthur Boulevard to allow for an expanded bike lane with a safety lane as a buffer. Let's say that a zoning change were to be made to the houses that front Mill Plain, which now has two traffic lanes in each direction. How would the city deal with parking, since there would be no capacity without removing traffic lanes that will be needed to service an increased population? Noise: I have no problem living with airport noise, river traffic, train and other sounds that result from our close and convenient proximity to services. Construction noise and noise from unmuffled or artificially enhanced automobile exhausts will always be annoying, and we need to be vigilant to ensure that the noise of growth is not ever-present. It is a given that large projects, such as the restarted Columbia bridge project, will be noisy, dirty and long, but construction projects in and around neighborhoods should be closely monitored. Public Services and Utilities: The requirement for more public services requires a very costly long-term commitment on the part of taxpayers. It is yet another reason that growth boundaries and proper design of higher density structures are important to the process. Any alternative that increases housing of any type must have the ability to show that it will not require an undue increase in city staff (including police, fire and other personnel) that will penalize existing taxpayers. As to utilities, growth will bring increased demand, and from what I know at the moment, alternatives to what currently exists are few. EARTH: My greatest concerns are increases in impervious surfaces and any grade changes that would cause erosion or non-point pollution that would affect drinking water sources or the Columbia River. Tangential to this but equally important is degradation to any creeks that run into the Columbia from any activities, including construction. I am also concerned about losing any open greenspaces or wooded areas, even if they are privately owned. The results of this can easily be seen in Orchards, where, in the last few years, forests and farmland have completely	

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	disappeared as housing developments have taken over. In most cases, these houses are single-family structures, and the selling prices appear to be far from what might be considered affordable. AIR QUALITY, GREENHOUSE GASES, AND CLIMATE: Growth will affect each of these. An increased use of public transportation will mitigate emissions to some degree, but the transportation system must be modernized and expanded to be able to serve all neighborhoods. WATER: As noted, I am concerned about construction runoff into creeks. I also worry about maintaining or improving the quality of drinking water and about our ability to provide drinking water as the population increases. PLANTS AND ANIMALS: Again, I must touch on the quality of life represented by many of the neighborhoods in the city. Greenspaces, such as those along Salmon Creek, Burnt Bridge, Blandford Canyon, Vancouver Lake, Columbia Springs, and others provide spaces for wildlife as do neighborhood parks. As previously noted, these spaces are a defining part of Vancouver and should be treasured and properly managed. Although this relates to the Earth and Aesthetic categories as well, I must make a reference to the preservation of the existing tree canopy that makes Vancouver so inviting. The neighborhood I live in has the second greatest tree canopy of any neighborhood (40 percent, according to a 2021 study). Only Southcliff exceeds this number. The idea of changing the zoning of such neighborhoods to allow for more housing runs counter to the long-term goals for air quality, greenhouse gasses and reducing climate change if the tree canopy is reduced."	
182	"My name is Lori Edenfield and I live at [address] in the Southcliff neighborhood of Vancouver, WA. I have resided here, along with my husband, since 2002. We raised 2 boys in this home, who grew up attending our neighborhood schools. This neighborhood is a blessing to our family, with streets that are not ""through streets"", providing less congestion, more walkability, and safety for children playing & riding bikes, enjoying the park, and knowing our neighbors. These were important reasons why we remained in this house for all of these years, first as renters, then as owners. The zoning changes proposed by the city in the draft EIS concerns me for the future of our neighborhood. I am against both zoning alternatives (1 & 2) as proposed. Besides the reasons aforementioned, I believe there are alternative locations besides Southcliff where this type of zoning could occur, such as proposals outlined in the neighboring Heights Development plan. It seems changes could be made to that plan, already in motion, to accommodate more housing and parking, without radically changing this neighborhood. If these zoning changes were to move forward in Southcliff, there would certainly be overcrowding of our streets and less safety for all its residents. I must also mention the long-standing trees in this neighborhood, including my own yard with 2 large Douglas Fir trees over 60 years old. The loss of the trees and wildlife habitat are not what Vancouver has stood for in the past. It is not in the best interest of the families living here, and those to come, to destroy the beauty and long-standing peace and rich wildlife habitat that makes this a desirable place to live. Adding commercial and mixed-use construction in this strip along Mill Plain, as well as Oregon Drive, would hurt so much more than help in this small community of Southcliff. Thank you for your time spent considering the opinions of the people who call Vancouver home and care about future growth, along with preservation."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
183	"Geobiological impacts of rezoning, Southcliff Neighborhood and Surrounding Area Comments by Michael F. Donnelly, Ph.D (Geology, Stanford University) and Registered Geologist WA, OR, and CA The regional distribution, including Tower Mall development of distribution of soil profiles will negatively impact slope stability, sediment saltation and sedimentation patterns. These impacts will in turn negatively impact surface water drainage rates and patterns, and ground-water recharge locations and migration paths, including potable water aquifers of the Troutdale Aquifer System (designated a Sole Source Aquifer in 2006 due to its critical nature). These consequential impacts will directly impact wildlife habitat, especially their migration corridors and reproduction success, including loss of tree canopy habitat.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	These wildlife impacts would be especially damaging to downstream salmon habitat along the nearby Columbia River. Wildlife impact would include bats, owls, and other raptors that inhabit these heritage trees, including the Southcliff cypress trees. These geologic, geobotanical and geohydrological impacts will also likely impact local and regional human health by disruption of radon-rich soils, contamination of potable groundwater aquifer, and of fault stability due to altered rain-water infiltrations, to excessive and differential distribution of load bearing stress (high rise housing density adjacent to lower rise residential density) and to removal of fault/landslide support buttresses. Also, radioactive exposure due to Clark PUD power lines and their distribution in Southcliff neighborhood would statistically affect a greater population. We respectfully request access to all relevant data the City used for the Mixed Use and Middle Density analyses, its distribution among all three rezones (including Low Density), and quantitative impact analyses on the surface and subsurface geology and hydrogeology, and on the geobiology and geohazards as discussed above in this email. The efficiency and effectiveness of any stated mitigation or offset plan cannot be accurately quantified without this baseline geoscientific data. However, please provide us with any such offset data for the Southcliff neighborhood and adjacent Tower Mall development. There are no science-based "guarantees" that any governmental offsets to this environmental damage will be effective. This request includes access to all such data provided by the State of Washington used to establish No Change, Low Density rezoning. This Low-Density rezone should have included an evaluation of these same negative impacts that the city's two higher density proposals would cause, perhaps only at a slightly reduced impact intensity."	
184	"Southcliff Rezoning - Comments on Market Feasibility of Housing Capacity Analysis, Related to the City's Proposed Rezoning Plans, Attachment 2, pp. 1-4, by ECOnorthwest Michael F. Donnelly, Ph.D. Geology, Stanford University, and Registered Geologist, WA, OR, CA Two proforma models were used to test the financial feasibility of various housing densities. They used housing prototypes that would theoretically reflect density development profiles that could potentially comply with the city's proposed two rezoning plans (in addition to the state's low-density rezoning). The results were intended to "deliver if such zoning was a constraint" for re-zoned market development. This email indicates such a constraint could be likely. These pro-forma financial models were based on the Land Budget (Residual Land Value, RLV) to evaluate development feasibility. The RLV is what a developer would theoretically have to pay for land (e.g. a Southcliff single-family rezoned residual lot) after first accounting for projected Development Costs and revenues from projected Rental Value and Ownership Value of rezoned developments. The costs included both "hard costs" (including parking costs and "soft costs" including Impact Fees, both undefined.) This equation determines the residual or backed-into derived value of a Southcliff rezoned lot must be for rezoned development to be positive as discussed below (scenario c). The Development Cost is then the sum of the derived residual Land Budget and projected Hard/Soft costs. Development Value is equal to the sum of Rental Income and Sale Ownership Values minus the Development Cost. The Rental Value includes the very subjective and sensitive Net Operating Income (NOI) calculation as discussed below (#2, Page 2). "We solved for the Land Budget (the RLV) that was possible given the NOI on the project and potential terms, interest rates, and debt service coverage ratio requirements" (Attachment 2, Page 3). Rental (Income) Value would apply, for example, to apartments, and Ownership Value would be net sales of condos or commercial retail sublot. See Exhibit 1 page 2, Attachment 2. This information does not discuss the all-important debt to equity ratio and the developer's threshold return on equity.	Comment noted. The Final EIS evaluates housing feasibility and market conditions in Chapter 3: Housing and Appendix: Housing Capacity and Feasibility Analysis. The ECOnorthwest pro forma models are intended to provide a general indication of development feasibility under different zoning scenarios, recognizing that site-specific conditions such as wetlands, geotechnical constraints, and ownership history may affect actual outcomes. As noted in the analysis, residual land value (RLV) is a relative indicator of feasibility rather than an absolute measure, and assumptions regarding net operating income (NOI), debt service, and capitalization rates are subject to market variability. Requests for access to modeling assumptions and outputs will be considered as part of the public record and review process. The Final EIS also acknowledges the importance of providing housing options for all ages and income levels, including smaller units that support aging in place and equitable access to services. Mixed-use development is intended to improve walkability and access to daily needs, while design standards and land use policies can help ensure compatibility with neighborhood character. Concerns about retail mix and affordability, such as those raised regarding the waterfront, are noted and will be considered in implementation to encourage neighborhood-serving businesses that meet community needs. Tree canopy, parks, and access to services remain priorities under the City's climate action and equity goals.

ID	Full comment	Response
	A projected ratio for each rent and sale price was used on each city prototype rezoning density (Rental Value/Ownership Value ratio, Exhibit 1, page 2, Attachment 2). This ratio was defined spatially (geographically) for each rezoned market area in the City. Footnote 1 on page 2 of Attachment 2 states that where low rents or no apartments exist in model tracts, this analysis uses interpolated missing rent values by using an average of their "neighbors" with similar rents and tenure splits, ordered by proximity and by adjacency on clustering such neighborhood tracts. Negative Observations re the Models and Analyses #1: The most sensitive, subjective, and easy factor to miscalculate in this analysis is for the derived Land Budget: Residual Land Value (RLV). This equation component is based on a projection of what a developer would need to pay for an existing Southcliff low-density rezoned lot to determine if the RLV would be commercially feasible. This RLV may not reflect the current RLV of the State of WA Low Density re-zoning or more importantly the single- family residential value of a Southcliff lot prior to the State 's rezoning. This is potentially a governmental taking of private land value whether by the prior State or current City rezoning plans. The RLV metric was used by these pro forma models to evaluate market development feasibility including the Southclif neighborhood lots: a. If the RLV is zero dollars, the development could be feasible if land were donated for free. b. If the RLV is less than zero (negative), the the development is likely not feasible unless the developer receives additional government subsidies or incentives, including free land. c. If the RLV is equal to or above (positive) derived residual land prices, the development is considered feasible at projected market rates. "Results from this method describe a general analysis of prototypes and does not consider the many potential unique conditions that could be factors in development feasibility (e.g. increased predevelopment costs, low land basis from longtime land ownership). For these reasons residual land value analyses should be thought of as a strong indicator of the relative likelihood of development, rather than the absolute measure of return to the investor or developer for any specific site" (beheardvancouver.org/plan2045, Attachment 2, Feasibility Analysis Overview, page3). #2: These models could have easily miscalculated the Development Value for higher-density prototypes particularly in the Southcliff Neighborhood by (a) dividing an inappropriate annual net operating income (NOI) by an inappropriate market-driven return on debt-service requirements, or by (b) determining an inappropriate loan capacity given debt service assumptions and the NOI for the models' selected lower-density prototype locations used for the State's rezoning.. The return of development cost could be the most important metric to get accurate pro-forma results because it establishes the economic threshold where the projected returns (rental value and ownership value) are applied directly against developer's/investor's project risk for rezoned development, particularly for the unique characteristics of the Southcliff neighborhood. For higher-density development, the developer's market-driven threshold for return on debt and equity is related to market capitalization rates, in order to determine Rental Value and can be optimistically or inaccurately applied to model scenarios to attract institutional capital, the typical investor in higher density affordable (rent/buy) housing. The most accurate economic and financial analyses would likely indicate the non-feasibility for development of higher-density residual and commercial rezoning with Mixed-Use and Middle Density in this historic park-like Southcliff neighborhood. We respectfully request access to ECOnorthwest modeling assumptions, inputs and output scenarios, especially related to derived Land Budget (RLV) and NOI for potential Mixed-Use and Middle Density rezoning proposal for the Southcliff Neighborhood.	

ID	Full comment	Response
	This type of economic/financial proforma scenario modeling should also be applied to the State's Low Density rezone assessment of the neighborhood. We also respectfully request access to such State modeling and its outputs as it would have affected the Southcliff neighborhood."	
185	I appreciate the work to include smaller housing units that accommodate younger and older people. It is important to me that as I age, I can easily get into a much smaller home with a safe park and access to services. Mixed use is fine but please do not make it such that living areas are surrounded by restaurants or shops that really add no value to a community. The current waterfront is ridiculous with the overpriced restaurants and no place to park to access these. Small shops catering to the needs of individuals living in a community are really important or one has to go outside of the area for the most basic of things.	Comment noted. Refer to Common Response #8 Housing Affordability/Options and Common Response #10: Businesses in Residential Areas for more information on these topics.
186	"City of Vancouver Planning Department [address] Vancouver, WA 98660 Subject: Request for Reconsideration of Proposed Zoning Change – Parcel [parcel number] Dear City of Vancouver Planning Department, I am writing to formally request reconsideration of the proposed zoning change for Parcel [parcel number], which is owned by Kondor Express and which I represent as their commercial real estate agent. For the past two years, we have actively marketed this property; however, the existing mixed-use zoning has already limited its sale and development potential. The proposed change to a Regional Activity Center (RAC) designation—requiring high-rise development at a minimum of 64 units per acre—would further hinder any feasible use of this parcel. In addition to market limitations, this site presents significant environmental and geotechnical challenges: • A large wetland area occupies a substantial portion of the property, restricting usable acreage and buildable space. • The ground conditions are unstable and not suitable for high-rise construction without extensive and costly mitigation efforts. Given these constraints, high-density development is impractical and economically unviable. On behalf of the property owner, I respectfully oppose this zoning change and request that the City consider rezoning the parcel to R-22 or R-18, which would provide a realistic development path consistent with the property's physical characteristics and market potential. We appreciate your time and thoughtful review of this request. Please feel free to contact me should you require additional documentation, environmental assessments, or further details to assist in your evaluation. Thank you for your attention to this matter. Sincerely, Larry Krotenko [phone number] Commercial Real Estate Advisor Knipe Realty"	Comment noted. The Final EIS evaluates the impacts of proposed zoning changes, including Regional Activity Center (RAC) designations, in Chapter 3: Land and Shoreline Use and Chapter 3: Housing. The analysis considers market feasibility, environmental constraints such as wetlands, and geotechnical conditions that may limit development potential. While RAC zoning is intended to support compact, connected growth and meet state housing requirements, site-specific challenges are acknowledged and may require further review during implementation. Requests for alternative zoning designations will be considered alongside environmental conditions, infrastructure capacity, and community input as part of the Comprehensive Plan update process.
187	Because of the Heights Development and the rezoning of the Southcliff neighborhood to include higher density housing and mixed use development, I am concerned about noise, traffic and parking around the area. The City has removed minimum on-site parking requirements for new high density housing, which will result in increased on-street parking around such development. MacArthur Blvd car traffic is already reduced to one lane each direction, with large schools fronting the street. Congestion, especially at school drop off and pick up hours will significantly increase with the additional of high density housing. Parking isn't allowed on MacArthur, which means cars will park in surrounding neighborhoods. Regarding the density in Southcliff, it is totally at odds with the current neighborhood and its neighbors. There is vacant land along Mill Plain between downtown and 192nd Ave which is better suited for	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	mixed use/high density housing, for example: the ball fields south of Mill Plain between Ft Vancouver Way and Reserve; land south of Hudson's Bay HS ball fields on the north side of Mill Plain; land east of 205 on the south side of Mill Plain near the Kaiser medical facility; and land where the Evergreen Air Field was located north of Mill Plain, east of 136th Ave.	
188	"Thank you for the comprehensive report! While I understand the need for more housing and jobs, I don't see enough information on how the city plans to ensure the amount of cars that will be added can get around easily. The current traffic congestion is quite terrible and cannot handle who is here now. It takes 30 mins to get from the west side to the east side of town! There are two other things I feel are lacking in the choices you've presented. Ensuring the history of Vancouver is honored throughout the city with art, nods to what was there, etc. (example: the airfield that used to be on the east side....if building there, somehow tie in that to the development). The last thing I feel is very, very important is to add trees wherever possible. Development has taken out soooooooo many trees over the last 20 years alone that need to really be replaced. It would be good for the air, the view, environment and even mental health."	Comment noted. Refer to Common Response #4: Vehicle Traffic Impacts and Common Response #12: Neighborhood Character. Tree canopy and vegetation impacts are addressed in Chapter 3: Vegetation and Wildlife. The plan emphasizes compact, connected growth to reduce sprawl and preserve natural areas, while also encouraging tree planting and landscaping requirements in new development. These measures support climate action goals, improve air quality, and contribute to community health and livability.
189	"We need MORE HOUSING. Not just in west Vancouver or the heights, but everywhere. We need more density, and we need more multifamily apartments/condos in every neighborhood. The Heights, Mill Plain, South Cliff, Fishers Landing, etc. Every neighborhood needs more density and more housing, otherwise we will keep losing out on affordability, homelessness will get worse, and we will create an unsustainable city. Please, go with Alternative 2 and build more density and housing everywhere in the city. Anyone who challenges this does not have the right to prevent people from accessing human basics, like housing, and groceries within walking distance of each other."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
190	"Hello, I would like to give feedback in support of Alternative Two of the Comprehensive Plan you've outlined. In the decades that I've lived in Vancouver, I've noticed the dramatic increase in housing cost, low availability, and a lack of basic essentials within walking distance. I believe we desperately need to build more housing, especially three and four bedroom condos, and townhomes. We also need a lot more shops in our neighborhoods. In my recent trips abroad, I noticed how easy it was to walk or bicycle to a nearby grocery store, cafe, or restaurant. Why can't we have that here in Vancouver? It is a basic necessity, and it's something every Vancouver citizen deserves. Our children, our elderly, our disabled, and everyone in between have the right and deserve a city that allows them to get basic amenities within a short walk. It would be unfair and against the city's values to prevent neighborhoods from building more housing and more shops and businesses. Thank you. - Susan"	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #8 Housing Affordability/Options and Common Response #10: Businesses in Residential Zones for more information on those topics.
191	Go with alternative 2 and build, build, build. There's a vocal minority of retired, wealthy, and privileged NIMBYs who don't want to see any change, even to their own detriment. Their privilege should not supersede the right of the public to obtain affordable housing, or to have things like coffee shops and grocery stores in their neighborhoods. Please, CoV, build more housing, more density, and make Vancouver a better place to live.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #8 Housing Affordability/Options and Common Response #10: Businesses in Residential Zones for more information on those topics.
192	"I'm commenting on the land use and transportation portion of this draft EIS. We absolutely need to go with alternative 2 and boost our density and housing supply in the city. As it stands, we are falling far behind other cities when it comes to building. Not only that, but our infrastructure is outdated. We need more bike lanes, more transit, and different types of transit, like streetcars. This is all possible if we increase density, and create a better environment for our citizens. We need more mixed-use developments across the city in every neighborhood, but especially on transit corridors. Mill Plain, Fourth Plain, and	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #8 Housing Affordability/Options and Common Response #10: Businesses in Residential Zones for more information on those topics.

ID	Full comment	Response
	pretty much all of West Vancouver. Fishers Landing, Bagley Downs, etc. We need to be building up, not out, and we need to allow all types of housing and businesses within the city limits."	
193	*Incomplete form, no comment received*	*N/A*
194	Id like to see how to encourage less concentration of grocery stores in large footprints to reduce VMT. People keep asking how will get groceries, because they assume you need a car.	Comment noted. The Final EIS discusses how mixed-use zoning and neighborhood centers can reduce vehicle miles traveled (VMT) by allowing daily needs, such as groceries, to be located closer to where people live (Chapter 3: Land and Shoreline Use and Chapter 3: Transportation). Encouraging smaller-format grocery stores and neighborhood-serving retail within residential areas is one strategy to improve access without requiring car trips. The plan's emphasis on walkable, mixed-use areas and transit-oriented development is intended to provide more options for accessing groceries and services without relying solely on large-format stores or automobiles.
195	How can we mitigate car noise especially as it relates to excessive noise, long straight paths encourage speed exhibitions. Especially at the waterfront.	Comment noted. Refer to the Noise and Transportation sections of Final EIS Chapter 3 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts.
196	I'm concerned with the plan to encourage more density and building if we can't encourage more developers then we can't meet our housing, as we aren't meeting them now.	Comment noted. Refer to Common Response #1: Selection of Preferred Alternative for more information.
197	I strongly support for option b	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
198	*Incomplete form, no comment received*	*N/A*
199	All neighborhoods need to change as part of this plan and should adopt mixed use zoning. We need more housing density and businesses to be available in all neighborhoods.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
200	"I appreciate the work that went into preparing the Draft Environmental Impact Statement (EIS) and strongly support the proposed land use alternatives. I would like to highlight a few areas where I believe the plan will have positive impacts: 1. Built Environment The proposed land use alternatives appear to promote thoughtful growth that balances housing, transportation, and economic development. I support the emphasis on creating more walkable neighborhoods, investing in transit-oriented development, and encouraging mixed-use areas. These strategies will strengthen the local economy while improving livability and access for residents. 2. Natural Environment I am encouraged by the EIS's attention to protecting sensitive habitats, waterways, and tree canopy. Preserving and expanding green spaces will not only enhance biodiversity but also provide health and recreational benefits for the community. Integrating climate resilience strategies, such as reducing greenhouse gas emissions and supporting sustainable building practices, is particularly important for Vancouver's long-term environmental health. 3. Cumulative Effects I appreciate that the EIS evaluates cumulative effects rather than looking at impacts in isolation. The coordinated approach to land use, transportation, and environmental protection reduces the risk of unintended consequences. By planning growth in a comprehensive way, Vancouver can ensure that development improves quality of life for current and future residents without degrading the natural resources we all depend on. Conclusion	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.

ID	Full comment	Response
	Overall, I support the Draft EIS and the land use alternatives presented. I encourage the City of Vancouver to continue prioritizing sustainability, equity, and resiliency as guiding principles in the final plan."	
201	"I believe every neighborhood should have access to groceries, cafes, restaurants, and more mixed commercial developments. This access will provide people from all abilities and socioeconomic statuses equal access to basic necessities which are currently barred behind expensive car costs and long distances. It is not fair that specific privileged neighborhoods should be able to prevent others from having access to housing and other amenities. These basics should be accessible to everyone, and we need to reflect that by building more housing and mixed developments everywhere. It should not be a privilege for some to deny this."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
202	"I would like to see traffic lights taken down and replaced with roundabouts. Some of the lights are on Mill Plain are so poorly timed you are forced to wait at lights. Roundabouts also typically have less annual maintenance and a longer life span that stop lights do. Where able, let's start scraping them. Please stop approving land use for unnecessary things, like a Lexus Dealership on Mill Plain instead of more affordable housing. Love the ideas to adjust zoning. Let's make our neighborhoods more walkable by allowing smaller restaurants and grocery stores to be built. A mixture of living of shopping feels especially doable in places like mill plain rather than turning it into a mini-highway with a ton of dealerships around which helps no one. Keep that stuff out by the Vancouver mall. More large scale bike paths should be built to help encourage folks to ride or scooter to work instead of driving. Main issues right now are cramped sidewalks or riding on the street which never feels safe. We should ensure developers have incentives to build more affordable housing and make it more difficult for large corporations or landlords to own multiple properties. Landlords offer zero value when they rent out single-family homes that would otherwise be purchased by home-buyers who will actually live in there."	Comment noted. The City's Transportation System Plan (TSP) includes roundabouts in recommendations for some Future Large Capital Transportation System Improvement Projects. For more information, see the Transportation System Plan webpage on the City's website for more information. Refer to Common Response #3 for the City's response to comments about car dealerships. Refer to Common Response #10 about businesses in residential zones. The Transportation section of Final EIS Chapter 3 addresses potential impacts of the alternatives on transportation. Proposed mitigation measures include improving bicycling access and infrastructure. Refer to Common Response #8 about housing affordability/options and #9 about homeownership opportunities.
203	The Village at Fisher's Landing is a safe, walkable neighborhood. We have access to parks and the nearby elementary school. We have lived here for many decades and value our homeowner investment. The sound barrier wall along 164th keeps undue noise and traffic out of our area. Yet we have easy close access to public transportation and needed commercial businesses. There is no reason to change this peaceful environment where property owners carefully maintain their investments.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
204	The Village at Fishers Landing is already close to commercial businesses and public transportation. There is no need to disrupt the safe quiet neighborhood that has been established over forty years. The sound barrier wall keeps traffic noises away, and prevents intruders from invading our yards.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
205	The Village at Fishers Landing is a strong safe community where neighbors know each other well. The Residents feel safe, and the streets are walkable without worry. It is very convenient to major roads, yet the sound barrier wall keeps it apart from unnecessary traffic and noises on 164th and 34th. There is no reason to change this situation.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
206	The Village at Fishers Landing is already close to public transportation and streets connecting us to important businesses and highways. We can use the bus service if we so decide. We have parks nearby, and a good elementary school within walking distance. There is no reason to change our well-kept community.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
207	The Village at Fishers Landing has good access to public transportation and important streets. The sound barrier wall does a good job of keeping the traffic noise and unnecessary traffic from entering our neighborhood. The houses and yards are kept up well, so there is no reason to change anything here.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
208	The Village at Fishers Landing is a quiet, safe, and well-kept neighborhood. The sound barrier wall on two sides stops traffic noise and undue traffic from entering our neighborhood. If we want to ride a city bus, we can do that easily. We live close enough to businesses that it is easy to buy what we need. We do not want any commercial businesses to change our neighborhood.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
209	The Village at Fishers Landing Neighborhood Association does have access to adequate commercial businesses as well as public transportation. There is no reason to change the safe quiet culture of this established neighborhood. The current sound wall on two sides of this neighborhood adequately keeps out unnecessary noise and traffic.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
210	The Village at Fishers Landing Neighborhood Association does have plenty of access to public transportation and commercial businesses, both within walking distance or a very short drive. There is no reason to change the current sound barrier wall -- this wall does a very good job of keeping out noise and curious strangers. The homes and properties in this neighborhood are relatively new and well-kept so there is no reason to change anything.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
211	The Village at Fishers Landing is a safe and family-friendly place, where neighbors know one another. It is close to major roads, public transportation, and businesses. The sound barrier wall keeps out noises and unnecessary street traffic. The houses and yards are well-maintained and up-to-date. There is no reason to change this neighborhood unnecessarily.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
212	The Village at Fishers Landing is a neighborhood that is well-established and well-cared-for. The sound barrier wall keeps the noises and traffic from 164th and 34th away from the yards and homes. There is good access to city buses on 34th and at the transit center. There is no need to bring commercial businesses into our neighborhood as they are easy to access right now.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
213	The Village at Fishers Landing Neighborhood is just what my family needs to feel safe and secure. It is a private neighborhood with only necessary traffic. It is safe to walk my children to parks and playgrounds. The sound barrier wall keeps out extra traffic noise and strangers. If we want to ride a city bus, we can easily get to a nearby bus stop.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
214	People are renovating their homes to create separated living quarters out of a single family home. It lets people live with someone, but not "on top" of them. It lets older people create living spaces for caregivers they feel they will want in the future. Some people want the convenience of their business and home being combined, so they want a duplex or a SFH to remodel. And of course, it lets all people live in a home at a realistic-for-them expense because they share the space or if they're the homeowner, they can earn a little rental income. As I understand it, both Map 1 and 2 would allow these modifications. I'd like to see these choices in all neighborhoods.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
215	Some of us have family members who travel to a different drummer. They need autonomy, but within boundaries. They need the opportunity for responsibility, but with firm support that living clear across town in an apartment wouldn't provide. Group homes are not that prevalent, but small apartment complexes close to family would help. Why not allow us the dignity to continue to live close to each other? I think both Map 1 and 2 would permit this mix of housing, and it irks me that someone with more money would deny others this opportunity. I'd like to see all neighborhoods mixed.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
216	"When I was 5, the little boy across the street and I planned out that we would get married and live together when we grew up. But where would we live? Both of us wanted to live with our parents. Our solution: we would live right in the middle of the street between our two houses. The desire to live near family matured, of course, but when people say they don't want the new zoning to allow any residential option other than single family, I wonder about their families. Lots of us would like to continue living near our families after the kids leave. Are their kids or grandkids rich enough to afford single family homes nearby or even at all? When I look at home prices, I can't imagine that's possible. Our grandkids had good jobs when they left home, but finding even apartments they could afford was not that easy. I think this is called mixed use, and I favor the map that offers it."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
217	Have you ever been to New Columbia, just north of the Columbia Slough in Portland? What an interesting mix of housing types, both cost and style-wise, and also with so many amenities near everything: retail, park, community garden, community center, etc. I don't know what type of zoning that is, but I take it that Map 2 would allow us to do something like that, so I favor it. Please don't let the naysayers' fears and loud voices stop flexibility for the rest of us.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
218	I'm lucky enough to live very near a coffee shop, a restaurant, and a grocery. I can walk or ride my bike to any of these places in less than 15 minutes and get to the doctor in 20. I can take the Vine, too, and I love it. I like it that we have a real mix of single family homes, duplexes, multi-family complexes, apartments, and retail. I would like to see more	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive

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	options, but as I understand it that will happen when the Heights Development gets built. I'm looking forward to those changes that will bring things I need and want closer together. I'd guess many people in my neighborhood have no idea how I feel about zoning for flexibility and density because I quit going to those meetings early on. Angry people started yelling within minutes of every meeting start. Raised in a barn, I guess. (Actually, barn animals behave far better.) I favor all of both Maps 1 and 2.	Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
219	"I ride my bike to Portland and absolutely love the way small businesses are tucked into neighborhoods everywhere. First, the smaller shops are always more interesting than chains. Second, when the weather has turned nasty or I got really hungry or tired, I've gratefully pulled into a coffee shop or corner grocery right where I least expected it, but really needed it. I've hopped on a bus and taken the MAX many times as a rescue, too. A similar surprise shop here is the little cupcake shop on Columbia St. It's pretty unexpected when you first find it among all the houses, and once it really saved the day for a friend who was new to bike riding and got really hungry and tired on our way home. I would like to see this sort of flexible zoning all over Vancouver in all neighborhoods, so I like both Maps 1 and 2."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
220	"I don't understand the maps in detail, but I talk to others who understand it even less. The most common misconception I hear is the fear that all neighborhoods will mandate high rise buildings and people don't want that. I DO want changes but as I understand it, the rezoning simply allows flexibility where there is none now. I don't think some neighborhoods should be allowed to opt out just because they don't want other people to "come in" which I take to mean people who have less money or a different skin color. The craziest example I have of this was when I was walking on the little path from South Cliff neighborhood that leads to the MacArthur slip lane. It's overgrown and I commented to another person walking there that it was tough to use and should be cleaned up. She said she lives there and that her neighbors wanted the path completely closed off -- they didn't want people from outside coming into their neighborhood. I laughed and asked if they knew about Rhododendron, Umatilla, and Manzanita and if so what were they going to do about them! Please give us the options in both Maps 1 and 2."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
221	Our current housing in The Village at Fisher's Landing offers my family and me privacy and personal space, thanks to generous setback, mature landscaping, and quiet streets. This area is safe for walking, biking, and driving. There is no need to invade this situation with undo demolition of safe attractive buildings in order to add density to our city.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
222	The Village at Fisher's Landing is convenient to major roads and public transportation services, yet is distinct from the high-density or commercial zones nearby. There is no need to invade this neighborhood with any commercial establishments. Let it remain a calm and safe neighborhood.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
223	The Village at Fishers Landing offers my family and me privacy. Our homes are set back from the streets, with a sound barrier wall protecting us from commercial areas and busy corridors. We have lived here for a very long time, and continue to live here because it is safe and quiet. We do not want our neighborhood changed unnecessarily.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
224	Although I am pleased the DuBois neighborhood is listed as low density housing I am concerned regarding the impact of such options as ADUs/ four-plexes, etc. The mid-century character of our neighborhood will be greatly impacted by such additions with the impact of itinerant occupants, increased traffic, increased noise, etc. Our neighborhood will already be impacted with the new Heights development and any additional incursions will impact traffic, crime and aesthetics of the neighborhood we have made our home. This neighborhood is one of the highest in Vancouver in property taxes, philanthropic support, and tree canopy. The neighboring Southcliff neighborhood will be even more impacted with the proposed development along Mill Plain Blvd with that incursion potentially impacting the neighboring DuBois neighborhood.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
225	This area is convenient to our family because it is close to major roads, services, and recreation. But our neighborhood is distinct from the high-density and commercial zones nearby. The public transportation system is close enough to be convenient. The block and brick sound barrier wall prevents unnecessary noise and traffic from	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	entering our neighborhood. These elements should not be changed. If they are changed, it will threaten our neighborhood.	
226	The Village of Fishers Landing Neighborhood has a strong community identity. This has been built through decades of homeowner investment and neighborhood pride. Our neighborhood is quiet and safe. It is close to public transportation and commercial businesses, yet they are kept separate with a sound barrier wall and a wise system of streets and intersections. The homes and yards are well-maintained. There is no reason to upset this peaceful neighborhood.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
227	The Village of Fishers Landing is close to major highways and streets that have public transportation. We have easy access to commercial businesses. Yet our sound barrier wall keeps our neighborhood quiet and private. There is no need to disrupt a well-maintained neighborhood where families feel safe to walk and bike.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
228	The Village at Fishers Landing is a long-established neighborhood that is safe and quiet. The sound barrier wall on 164th and 34th keep out traffic noise and unnecessary foot or vehicle traffic. The transit system is easy to access on 34th or by driving or walking to the transit center. It is easy to get to businesses such as Fred Meyer or the gas station. The character of this neighborhood should not change.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
229	The Village at Fishers Landing is a stable community that is safe and quiet. We already have easy access to the city bus and transit center. Our Sound Barrier Wall does an adequate job of keeping out noise and strange foot traffic.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
230	The Village at Fishers Landing is a long-time neighborhood that is well-maintained and safe. There is not unnecessary traffic within our neighborhood. Families can safely walk to parks, playgrounds, and schools. We are able to use the city bus or nearby transit system easily from our neighborhood. There are businesses within walking or short driving distance already.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
231	The Village at Fishers Landing is a well-established neighborhood that is safe and convenient. The public transit system is easy to access. There are already many businesses within walking distance or a very short drive. The sound barrier wall does a good job of keeping out undue noise or unnecessary traffic. The access to our neighborhood should not be changed.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
232	The Village at Fishers Landing is a quiet and safe neighborhood. It has good access right now to public transportation and nearby commercial businesses. There is no reason to change anything.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
233	We are Fred and Polly Bullert and for 22 years we have resided at [address], Southcliff neighborhood. We oppose any changes to the Southcliff zoning. Our neighbors have identified numerous reasons to oppose the changes. We agree with all of them. Southcliff was developed as a single-family neighborhood which is the primary reason we moved to Southcliff. A number of years ago a State of Washington architectural historian delivered a lecture on Vancouver architecture. He noted that Southcliff represented a model single-family development with a park set aside and a wide variety of home styles. He added that Southcliff significantly added to the diversity of the Vancouver housing stock. It would be folly to degrade Southcliff even assuming Vancouver's population increased as speculated. The need to change the zoning is certainly questionable; the resultant damage to Southcliff would unquestionably be profound.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
235	"I would like to comment on the alternatives offered for moving forward. It is my strong opinion that, if we want to meet the future head-on, we must go directly to Alternative 2. We don't have the option to half-ass the future of this city, not if we want to thrive and provide for the needs of all our people. We don't want to continue being Portland's shy little sister. We need to step into our big girl shoes and dance!	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
236	I understand the arguments for not planning anything and for Alternative 1. They feel safer, but bottomline is that they are about fear, fear of change. The city IS going to grow. If we don't plan for that, housing will be slapped up wherever it fits. The homeless population will grow even faster as more people are left out of the marketplace. I vote YES for Alternative 2!	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
237	*Incomplete form, no comment received*	*N/A*

ID	Full comment	Response
238	"To: City Council City of Vancouver From: Bryant Carlson and Family [address] Vancouver, WA 98661 Re: Feedback on Proposed Mixed-Use Zoning Dear City Council Members, My name is Bryant Carlson, and my family and I live [address] in the Southcliff neighborhood. Other than some graduate school years on the east coast and in California, I am a proud lifelong resident of Vancouver. I am a product of Vancouver schools, my daughter attends school in Vancouver, and my wife and I both have parents and siblings who live and work in Vancouver. My roots in and affection for Vancouver run deep, beginning with my childhood years near Oakbrook Park in Orchards. We purchased our home in the Southcliff neighborhood 18 months ago and recently moved into the home after using each of those months to renovate. We have made a considerable investment and worked as thoughtfully as possible to preserve the historic character of both the home and neighborhood during our renovation. We have studied the zoning change proposals put forth in the City of Vancouver's Draft EIS and we are writing to oppose the adoption of Alternative 1 and Alternative 2 as currently proposed. We have children and an older adult parent who live in our home, and we bought in the Southcliff neighborhood largely because of its safe and quiet streets. My retired mother walks along our street every day, and our children join her on their bikes. The mixed-use zoning proposals would invariably direct hundreds of additional car trips throughout the neighborhood, considerably increasing congestion and reducing safety, and making walking and biking untenable as the neighborhood streets are set up in the mid-century style with wide streets and without sidewalks. The proposals would also result in an increase in noise pollution, a loss of privacy, environmentally undermine the rich natural habitat (e.g., deer and other wildlife routinely roam through our back yard) and broad tree canopy coverage in the neighborhood, and destroy the area's historic single-family character. The proposed changes seem to disregard the neighborhood's long history and planning, particularly related to the Southcliff Restrictive Covenants and the 2001 Neighborhood Action Plan. I played in the Southcliff neighborhood as a child at a friend's house in the 1980s, so I am familiar with the long-established character of the neighborhood and its mid-century planning and development, and believe that the vestiges of that time, only some of which I have described, are worthy of preservation. I am also keenly aware and strongly supportive of the need to create additional affordable housing; however, it seems especially short-sighted for the city to consider proposals to achieve that goal which profoundly degrade the quality of one of the many neighborhoods that has made Vancouver such a desirable and safe community in the first place. My family and I certainly understand that our city must plan for growth, but we believe that there are more effective ways of achieving this than by compromising the unique features of Southcliff. Rather than re-zoning parts of Southcliff as a mixed-use neighborhood, please instead consider concentrating new commercial development in the Tower Mall Heights District area, particularly since the city is already planning to invest in the infrastructure needed to help new commercial spaces thrive in that area. This would align with the city's goals to develop new economic hubs and affordable housing, while also preserving the unique attributes of our neighborhood. We appreciate your leadership of our community, and thank you for the opportunity to provide feedback. Best regards, The Carlson Family"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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239	"September 3, 2025 Hello: My name is Cherie Briggs and I live at [address] in the Southcliff neighborhood. After reviewing the zoning change proposals that have been put forth in the City's Draft EIS, I would like to give my personal input. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Labor Day Weekend is always special for us as that is the weekend we moved into Southcliff with our young family and no knowledge of "Vancouver USA" except for that funny sign on I-5 we would drive past. This year marked our 40th year living in this neighborhood. We spotted a "House For Sale by Owner" sign and knew this was the place for us. Although we knew nothing about Vancouver at the time, this neighborhood gave me the vibes of a perfect place to raise my kids. I was right! Very little has changed about this neighborhood since that day. This neighborhood has a special charm that makes Vancouver special. It offers quiet, wide streets with low traffic flow that encourages bike riding, walking, and taking your little ones on a stroll. Walkers and bikers regularly travel though our neighborhood feeling safe and enjoying the full growth canopy of trees. I always felt safe with my kids outside. Forty years is a long time in one place. As my family has evolved and I have aged, the neighborhood has continued to be my place to live. I am hoping it will continue to be that special place for the new families that arrive. I moved here because of the quiet, walkable neighborhood in the city limits which is special for most cities. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable. And even worse would be the loss of trees/canopy that the wildlife that chooses to live here needs to be healthy. We will have lots of development coming with the Heights District redevelopment. That would be the perfect place to design in the extra housing. As my family gathered at our home for the weekend, they continually mentioned how special and nice this neighborhood is as my grandchildren enjoyed the peaceful environment. It was hard for them to hear about the changes that may come. Please consider rethinking your long-range plan for Southcliff and those neighborhoods immediately around us and keep this area feeling like the mid-century community it has always been. Sincerely, Cherie Briggs; [email]"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
240	Regarding this project our major concern for the Dubois neighborhood is congestion/traffic/parking issues. One of our favorite things about our neighborhood is the beauty and walkability that we can enjoy with our whole family. It feels safe with minimal traffic and minimal cars parked on the street and we fear that will change with this development plan. We do not have strong CC&Rs so with an influx of many more people and cars we will not be able to maintain that safe and quiet neighborhood feeling.	Comment noted. Refer to Common Response #4: Vehicle Traffic Impacts and Common Response #6: Vehicle Parking for more information.
241	"There are (at least) two elements that I see that lead me to favor alternative 1 over alternative 2. First, I see in table 3 (p31) that alt 2 provides less land for Heavy Industrial, Industrial/Employment and Institutional Campus than does alt1. This troubles me for two reasons. Fewer of these jobs means residents travel farther to, say, Portland for that kind of job. This does not help traffic. On top of this is a glance at table 8 (p51) which indicates that these zoning designations provide amongst the best wages - perhaps a better way to reduce the poverty level. The second element made me think of two trips I've made to Singapore, the first being in the early '80s and the other nearly 40 years later. In the early '80s Singapore was rapidly urbanizing, tearing down most all of ""old Singapore"" with its colonial architecture and replacing with 20 story apartments. I had heard that there was quite an uproar and the city spared some of these old neighborhoods. Now, they are tourist magnets. Hough and Arnada neighborhoods both date to roughly the beginning of the 20th century. Alt 2 would lead to more conversion of ""old/quaint"" to ""new/boring"". Once torn down, the old stuff cannot be put back in. Given that alt 1 achieves residential growth goals, I'd suggest that it's easier to take a step, gather one's bearing and then take another step, rather than to overstep and try to back-up."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative zones a similar amount of land for Heavy Industrial and Industrial/ Employment compared to Alternative 2, and more land is zoned for Institutional/Campus compared to No Action and Alternatives 1 and 2. Refer to Common Response #12 Neighborhood Character for more information on that topic.
242		

ID	Full comment	Response
243	"Southcliff is a mid-century modern neighborhood and should not be changed. I have lived in Southcliff for over 50 years and raised five children in this neighborhood. It has always been a safe, quiet, private neighborhood. I have always enjoyed the classic architecture. I have always felt safe in my home and have only had one minor episode of trouble in my 50 years of living here. That was approximately two years ago when a transient person was sleeping in my front yard under my tree. The proposed changes to the zoning, would undoubtedly increase crime in Southcliff. Why make our neighborhood less safe? Southcliff is not built with adequate infrastructure for the proposed zoning changes. The proposed changes would be increasing traffic by 100 to 200 vehicles of all sizes daily, along with their associated noise and congestion into the neighborhood ruining the historic character of Southcliff. It doesn't make any sense to change the zoning in Southcliff when the former Town Plaza is wide open for mixed-use development. A better alternative is to develop the Fourth Plain Corridor or Vancouver Plaza. I understand that Vancouver is a growing community, but I feel that the growth should be in locations which do not require people to have their homes unwillingly rezoned thus changing the quality, character and value of the neighborhood."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
244	I live at [address] and respectfully ask that 35th Street and Washington Street not be included in the proposed institutional/campus rezoning under Possibility 1 & 2. Applying an institutional designation to only one side of the street creates an inconsistent and awkward transition that undermines neighborhood cohesion. Our block is firmly residential in both character and use, and rezoning just one side introduces uncertainty, lowers homeowner confidence, and diminishes the stability that makes this neighborhood livable and attractive. A consistent residential designation on both sides of the street would preserve the integrity of the area while still allowing for thoughtful campus planning elsewhere.	Comment noted. The Preferred Alternative would zone this parcel as Medium Scale Neighborhood.
245	"Greetings, My name is William Rogers, and I live at [address] in the Southcliff neighborhood. In reviewing the zoning change proposals put forth in the City's Draft EIS, several serious concerns have come to mind. My concerns are motivated by a desire for livability, vitality, inclusion, public health and safety, and the preservation of cultural and natural resources in the city of Vancouver. The Southcliff neighborhood contributes to all of these factors for the city of Vancouver. I would like to point out some ways in which the City's Draft EIS degrades or detracts from these goals in the hope that revisions can be made to preserve what is good about Southcliff. I located my family in the Southcliff neighborhood in 2011 for its quiet, walkable streets and large, majestic, and diverse trees. The urban canopy in the Southcliff neighborhood is second to none in the city, providing 47% tree coverage per the 2021 survey, up from 45% in the 2011 survey. We see nature in our park, backyards, and on the streets. Animals thrive, with deer, rabbits, squirrels, and other wildlife making Southcliff and the surrounding green space their homes. The diversity of trees, including oak, maple, birch, sycamore, redwood, conifer, pine, fruit trees, and many mature ornamental tree, makes Southcliff valuable. This diversity supports many types of birds—not just hardy urban landscape species, but delicate wilderness species as well. Where animals and birds thrive, adults and children thrive. Many people beyond Southcliff homeowners enjoy walking, cycling, and jogging through Southcliff, finding it a peaceful retreat in the city. The park hosts guests from the adjacent neighborhoods, making Southcliff not just a jewel for a lucky few, but also something precious to steward and share with others. Southcliff neighbors are inclusive and welcoming. I desire to see the character of the Southcliff neighborhood preserved as a model to study and learn from. While not all attributes of Southcliff can be replicated in every neighborhood, as a historic mid-century modern neighborhood, it maintains a unique collection of features worth studying and preserving as a reference for city planning. The Southcliff neighborhood was established in the 1950s, with CC&Rs dating back to 1954. These CC&Rs allow for one single-family dwelling per lot of no more than two stories high and thus are violated by Alternatives 1 and 2 as currently proposed. Therefore, I stand opposed to both alternatives. The proposed alternatives allow the addition of commercial and mixed-use buildings to our neighborhood. Such projects would mean the elimination of mature trees and would degrade the neighborhood's ability to support	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	wildlife. They would increase cars parked along streets and reduce the walkability of the neighborhood. Cycling and jogging would be less safe and less convenient. I support urban growth and understood that the Heights District redevelopment is to be where commercial and mixed-use high-rise buildings are to be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. Access to commercial and mixed-use high-rises would not be from Mill Plain but rather from our neighborhood streets, creating huge congestion on those streets—not to mention safety issues for pedestrians and cyclists. I am concerned that limited access to Southcliff due to roadways and terrain would mean only a limited buildout of mixed-use development, which would result in destroying the character of the Southcliff neighborhood while providing minimal benefit to the city. For these reasons, I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Instead, I encourage the City to preserve the qualities that make Southcliff a living example of what a thriving, sustainable, and inclusive neighborhood can be: quiet and walkable streets, a diverse and flourishing tree canopy, safe spaces for recreation, and a welcoming community spirit. Protecting Southcliff is not just about safeguarding one neighborhood—it is about keeping alive a model of livability and stewardship that benefits the entire city of Vancouver. Sincerely, William Rogers [address] Vancouver, WA 98661-5913"	
246	"To whom it may concern: My neighbors and I are very concerned! As a homeowner and resident in the historic Southcliff neighborhood in the Heights area of Vancouver, I am troubled to hear that our single family dwelling lots are slated to be rezoned throughout the neighborhood for various business and high-density housing uses. In my experience, city planning means careful consideration of a city's future needs and making a thoughtful plan to accommodate growth in a way that preserves beauty, livability, and sanity for the residents. It puts careful consideration into where the different types of structures should go, putting businesses in business districts, homes in neighborhoods, apartments in apartment blocks, etc., while protecting spaces for trees and animals, bushes and birds, as well as playgrounds and walking spaces. Such planning takes deliberate effort, but it makes sense if planners want residents to be healthy and happy and willing to make the city their home. The current plan proposed for historic Southcliff, and other neighborhoods throughout the city, appears to have missed this meaning of planning! In an effort to accommodate a large influx of new residents in the coming decades, a sweeping change of the current zoning of residential lots will haphazardly allow high density housing and businesses to be built in places current residents would never have dreamed of! Our neighborhood was developed in the 1950's. The lots are large and the streets are wide. No sidewalks, but a huge variety of large old trees and a vast array of little critters and birds. It's an old, quiet neighborhood with history and character, a uniquely quaint and peaceful slice of Vancouver. Most homes have copious driveways, so very few cars are parked on the roadways. This lends the neighborhood a safe and friendly feeling, inviting outside residents to join us here to enjoy a stroll, walk their dogs, and play with their kids in the park. The simplicity and wholesomeness of a bygone era can by tangibly felt here. It is a place to protect for the benefit of all! One can only imagine how altered this peaceful historic neighborhood would be if even one of the old homes were transformed into a business or a high-rise multiplex. If such an event were to happen, it would be sure to create a destructive domino effect. The lots would go one after another, because residents here would lose something extraordinarily special, something they pledged to protect when they purchased their homes and agreed to the neighborhood's longstanding CC&R's. With this new threat of such an unexpected and undesirable event, residents such as myself are reconsidering value-enhancing investments in our homes and pondering selling out. Why bother making improvements if the homes will just be sold for development fodder? And if the neighborhood is to be violated	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	in such a way, why should we stay to see it happen? Our neighborhood will be irrevocably damaged by the city's proposed rezoning. There are many reasons our Southcliff neighborhood should be protected from the new zoning. Tree coverage is a big one! Southcliff has the greatest tree coverage of any neighborhood in Vancouver at 47% and growing, while the city as a whole has just 19%. With Vancouver's overall goal of 28% by 2047, taking out our lovely old trees to build tall multiplexes would definitely be a step in the wrong direction. Our trees should be protected! Old trees like ours are far bigger than new development trees, providing much-needed habitats for otherwise endangered birds and other small animals, and working mightily to clean the polluted city air. Protecting these large trees is so important to the livability of our city! Allowing them to be destroyed in the name of high density housing and replaced with tiny saplings would be a travesty. Our environment must be cared for, even within city lines. No place better than here in Southcliff where we are already making a positive impact! And an important aspect to note regarding our trees: taking a peaceful stroll through our beautiful neighborhood will reveal that our trees are not all of one kind. The apparent diversity of our large trees is absolutely astounding! Each one is invaluable. This is not what you would find in a more modern development, with lines of trees of all the same sort. We have enormous regal evergreens as well as imposing old deciduous trees of so many kinds! They provide boundless beauty and so many animal homes. And those innumerable green leaves furnish us with fresh clean air as well as protective shade. To redevelop our neighborhood into high-rises would desecrate nature's presence here in our city. There are other concerning impacts that my neighbors will note regarding the proposed rezoning, such as excessive neighborhood traffic and on-street parking, watershed issues, loss of historic architecture, loss of privacy and safety, etc. But my greatest concern is the threat of destruction to this peaceful haven of a neighborhood, a neighborhood that helps make Vancouver a more livable and beautiful city. I realize that our city faces the pressure of increasing population and housing needs. But high-density housing types should be placed where they make good sense, not where they will destroy a well-planned historic neighborhood! And I might add here that the homes in our neighborhood are already large enough to accommodate more residents. For example, our home is currently occupied by 10 family members from 3 generations, and we have accommodated as many as 12. Another home just up the road is occupied by a large group of young adult housemates. The homes in Southcliff already have high density usage and potential. They can find their best uses without tearing them down and replacing them with multiplexes and businesses! Please, city planners, reconsider your "plan" with regard to Vancouver's historic neighborhoods like Southcliff. You would not consider rezoning Officer's Row would you? I would propose that Southcliff has similar historic value in Vancouver and should be protected for the city, for the trees, for the animals, and for the people city-wide. Please, protect Southcliff! Your consideration is greatly appreciated. Sincerely, Julianne Rogers [address] Vancouver, WA 98661"	
247	"From: Michele Rudi Resident and owner of [address], Vancouver, WA 98661 Southcliff Neighborhood [email address] [phone number] Dear City of Vancouver, the Vancouver City Council, Mayor and the City of Vancouver Planning Commission	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	We have been residents in the Southcliff neighborhood since the Fall of 2004, going on 20 plus years. We had many options on where to mover our family from Salmon Creek in 2003. However, we chose the Southcliff neighborhood for its location near work and school. large private lots, walkable streets, a local park, a safe neighborhood with minimal traffic, established landscaping and tree canopy, and the exclusive reputation that Southcliff has had since the 1950's and 1960's, when it was formed. When we moved in, we had original owners on either side of us, both of whom raised their families in Southcliff and had built in the 50's. This is very common, people don't leave Southcliff for the charm and points I listed above. Our neighborhood was, and still is, known for being home to a large number of professionals, including doctors, lawyers, business owners, board presidents, schoolteachers, homemakers, philanthropists, pilots, restaurant owners, government officials, TV broadcasters, and the list goes on. Our neighborhood is hardworking, and it shows in the pride of ownership evident in the yards and homes of this established enclave, governed by its Covenants, Conditions and Restrictions. We have a stable, historic neighborhood that serves and contributes back to its community. We rely on our CC&R's to guide our neighborhood, ensuring that we can maintain the foundation and heritage that Southcliff was built upon. I write to you today to oppose the mixed-use and medium-scale housing that you are proposing to implement within the boundaries of the Southcliff neighborhood. These changes would severely impact our property values. It has been calculated that Southcliff property values total 80 to 100 million dollars. I think it is a reasonable question to ask: Will the city be compensating homeowners for property loss in our property value? These changes would add stress, traffic, and public safety concerns. Our per capita rate for officers is already the lowest in the state. We should have 3/2 officers per every 1000 residents. Vancouver has only 1.2 officers per 1,000 residents. It seems that the priority to make our city safer and cleaner is an afterthought. We should not be adding density until the public safety problem is under control. The mixed and medium scale would add additional traffic and street parking to our quiet neighborhood. It would greatly change our single-family homes, with a minimum of 1800 square feet and a maximum of two stories in height. The changes you are proposing are prohibited by our Covenents, Conditions and Restrictions (CC&R's). It is my understanding that the Middle Housing Bill does not trump our current active and enforceable CC&R's. I was also shocked to learn that the Tower Mall project has now been zoned as a regional activity center. Southcliff as a whole was opposed to the Tower Mall project, due to the added density and traffic concerns. Change is unknown and done without proper planning can result in negative outcomes. I, for one, was hopeful that Tower Mall could add some services to our area, but upwards of 1300+ housing units, with little parking, and now a building height that has no restrictions, is troublesome. I am also concerned that our arterial streets, such as Blanford Canyon, are not included in the plan to be updated to accommodate the increased traffic. Blanford Canyon historically has poor lighting, no sidewalks, or protected areas for walking and biking. Additionally, it connects to Old Evergreen Blvd, which was not updated for heavy traffic when the Rose Vista property was developed for mass-density housing. Don't get me wrong, I am for the Tower Mall project as long as it has components to fit in and blend with the Southcliff, Dubois, Buena Vista, and the surrounding neighborhoods in a respectful capacity. Allow medium-scale development, 3 to 5 stories tall, with ample parking, improve the road arterials, and increase the number of officers to improve public safety with increased density. My vote is for the No Action Alternative. Growth in inevitable, but growth that occurs too quickly without infrastructure and public safety at the forefront will only cause leadership to work backwards, chasing its tail, and never able to get ahead of the problems that exponential growth brings. Thank you for your time and leadership. Sincerely, Michele Rudi"	
248	"Page 1 of 3 Hello to those who are planning for the future of Vancouver, Washington: I was going into sixth grade in 1957 when we moved into the house that my parents built in the new neighborhood of Southcliff.. I grew up there, went to college in Seattle, moved to the Bay area, then Los Angeles, then to midtown Manhattan in NYC. Although I spent most of adult life living in rentals in large urban cities, when I retired I returned to my family's home on Umatilla Way.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	My mother spent many years working for the betterment of Vancouver. She served on the Planning Commission and on City Council. She was a cheerleader for the City of Vancouver, and strongly believed that it could grow and thrive without losing the inherent beauty and homeyness of a big / small city. She had encouraged me to study City Planner. So I was incredulous when I learned that city planners aimed to change the zoning of Southcliff. Why would anyone want to downgrade what is arguably one Vancouver's most beautiful neighborhoods? I was disbelieving when I heard that the city planned to change zoning classifications and countermand the CC&R's that have been honored by Southcliff residents since the area was first developed You may know the war time history of the Heights area. If not, please see the attached page for an article from the Columbian. It was a gigantic task and the city met the challenge. After WWII the Vancouver Housing Authority created new neighborhoods to replace its temporary war housing. They moved or tore down hundreds of small houses on small lots. The new developments had large lots and the restrictions imposed on these neighborhoods show that they were designed to be the OPPOSITE of the war housing they were replacing. Again, the city met the challenge. Southcliff, one of those new neighborhoods, is one of the most gracious neighborhoods in Vancouver. It was planned to be a place with low-rise single family houses. The CC&Rs set a minimum house size of 1400 to 1800 square feet. Most houses are "ranch style" and several are in the mode now known as mid-century modern. Because of the large lots many houses have large front yards with lots of greenery. Southcliff is basically a cu-de-sac. There are no "through streets" and there is very little traffic. We have no sidewalks so people walk, bike, skateboard and chitchat on our streets; some do these things several times a day. Why would anyone want to destroy the character of this very unique neighborhood? Like most of my neighbors, I worry that zoning changes will lead to traffic overwhelming our quiet streets. Re-zoning for multi-story high-rise buildings at the only entrances and exits from Southcliff would, in effect, destroy our neighborhood. The Southcliff CC&Rs are restrictions that the residents have upheld since the beginning. We have kept our end of the bargain, but now local government is planning to break its end of the bargain. The Tower Mall is about ½ mile from my street. That development will increase traffic on this stretch of Mill Plain. Attached is a recent opinion piece from the The Columbian warning about potential traffic congestion. Increased density in Southcliff would further compound the complexities that come with rapid growth. In my experience urban density offers many benefits. I appreciate the vibrancy that can come with urban growth, but I am absolutely opposed to any plan that will change the nature of Southcliff, a very special small neighborhood. I think it will be a BIG mistake to do anything that changes the qualities of this space. It is a model that has worked very well for close to 70 years. Respectfully, Laura Besserman Umatilla Way Page 2 of 3 Clark County History: Kaiser Shipyards A Tale of Six Cities By Martin Middlewood, for The Columbian Published: December 27, 2020, 6:00am	

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	https://www.columbian.com/news/2020/dec/27/clark-county-history-kaiser-shipyards/ Employment at the Kaiser Shipyards brought 45,000 workers and their families to Vancouver right after World War II started, and they needed housing. Suddenly villages sprung up forming a ring around middle-class Vancouver. This 1942 photo taken on the new communities' opening day shows the areas offering temporary homes for shipyard workers and their families: McLaughlin Heights, Fruit Valley, Ogden Meadows, Bagley Downs, Burton Homes and Harney Hill. (Contributed by Clark County History Museum) Once World War II broke out, the Kaiser Shipyards worker recruitment ballooned Vancouver's population. Abruptly, a town of 18,000 faced an influx of 45,000 more. Stunned by a population spike of two-and-a-half times its own, the city turned to planning. First, it established the Vancouver Housing Authority to work with the federal government to solve its housing and municipal crises by creating one of the world's largest housing developments. The VHA purchased land, applied for government funding, and assembled 125 architects, draftsmen and engineers to plan and create new communities. Overnight, 12,343 dwellings and two 5,000-bed dormitories, the Hudson House and Columbia House near the shipyard, cropped up. In 18 months, six new developments embraced Vancouver. Each new borough needed essential services. The government constructed electric networks and worked with the public utility district to deliver electricity. Residents required police and fire stations, medical offices and churches, schools and sewers, roads widened and extended. Vancouver's downtown businesses couldn't handle the flood of war workers and families needing to shop for groceries and clothes. So authority planners constructed five shopping centers and leased the space to private business owners. The Boulevard Shopping Center at Devine Road and MacArthur Boulevard arose as one of the nation's first one-stop shopping malls. Eight schools, seven child care centers and nurseries for working mothers popped up. Five staffed libraries appeared at community centers. The Vancouver Council of Churches found auditoriums, gyms and community rooms for services. Each community held beautification contests, making temporary houses feel permanent. Hundreds of Victory gardens stretched dollars and ration tickets. Many new families found living around Vancouver an adventure. The VHA designed playgrounds for the thousands of children who came with their parents. Saturdays, two thousand kids saw free movies. Weekly family movie nights brought in 2,700. Frequent dances brought in hundreds. The VHA never saw a fiscal deficit during the war years. And after the war, returning veterans found housing in these communities. Inevitably, fears of temporary housing slipping into permanent slums saw most of them torn down. Martin Middlewood is editor of the Clark County Historical Society Annual. Reach him at [email] Page 3 of 3 In Our View: Closely eye Heights District plan's traffic impact https://www.columbian.com/news/2025/aug/29/in-our-view-closely-eye-heights-district-plans-traffic-impact/ The following is presented as part of The Columbian's Opinion content, which offers a point of view in order to provoke thought and debate of civic issues. Opinions represent the viewpoint of the author. Unsigned editorials represent the consensus opinion of The Columbian's editorial board, which operates independently of the news department. By The Columbian Published: August 29, 2025, 6:03am The city of Vancouver's plan for the Heights District is ambitious, expansive and well-considered. But no plan is perfect. As the 20-year proposal for remaking a neglected piece of central Vancouver moves forward, some questions remain.	

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	Primary among them is traffic. Although the development is designed to maximize the access and availability of public transportation, an increase in housing density invariably will result in an increase in auto congestion. The 644-page proposal developed by city staff reads: “Regionally, the Heights District is well connected to the State and Interstate Highway system. Mill Plain Boulevard provides direct connections to I-5, approximately two miles to the west, and I-205, approximately 2 miles to the east. Andresen Road provides access to SR 500 approximately a mile and a half to the north, and MacArthur Boulevard connects to SR 14 via Lieser Road, approximately a mile to the southeast.” That likely understates the impact along arterials leading to local highways, and it fails to prepare for increased congestion — particularly for a city that is actively reducing traffic lanes. But it does exemplify the complexity of a transformational development. Starting with the city’s purchase of the former Tower Mall site in 2017, the project has moved along incrementally. Eventually, the area near Mill Plain and MacArthur boulevards — plus Devine Road — will be a 205-acre, mixed-use walkable neighborhood with office and retail space, housing and recreational outlets. The plan is to create a “20-minute neighborhood” where residents may walk, bike and take transit to meet their daily needs. The philosophy has been adopted by cities throughout the world and is transforming urban planning. As the London-based Town and Country Planning Association writes: “The benefits of this approach are multiple: People become more active, improving their mental and physical health; traffic is reduced, and air quality improved; local shops and businesses thrive; and people see more of their neighbours, strengthening community bonds.” Vancouver’s planning documents hail the proposal as “an opportunity to create a new vibrant mixed-use urban neighborhood that is strategically located in the heart of Vancouver ... with easy access to major commercial uses, social services, schools, places of worship, parks and open spaces and downtown.” That plan took another step forward this week, with the city council agreeing to purchase four parcels of land within the planning zone for approximately $11.5 million. The properties currently house PeaceHealth’s Southwest Hospice, medical offices, storage and a parking lot. PeaceHealth may continue to lease the site until the sale’s closing date in 2030; in the meantime, construction on two multifamily residential units is expected to begin next year on another portion of the development. Most important, the vast proposal turns attention to a long-overlooked part of Vancouver. As a former city official said during the early phase of planning: “This is an area of the city that had been passed over by the market forces that had transformed downtown to the west, as well as many of the corridors and the neighborhoods in many of the eastern portions of the city.” Yet while the development is designed to be largely self-sufficient, its impact will extend beyond the Heights District. That calls for more details from the city about traffic and long-term plans for arterials. Even the most extensive plans, after all, can be incomplete."	
249	"A Letter In Support of the Neighborhood of Southcliff I believe that we will be needing housing for everyone as our city grows, low-income, affordable, single-family and otherwise, as the population in our area increases. Adequate housing is a very important issue. I know what it’s like -- our family rented for twenty years before we were able to finally buy our first home. While I was in years of schooling and then training, often times we were paying 70% of our total income for rent. Our home in Southcliff, which we purchased twenty years ago, is a wonderful place. We were fortunate to be able to buy a home instead of renting, not everyone can. Our house, and the lot we have, is not the biggest in the neighborhood by a long shot. This is an old neighborhood, thoughtfully designed about 70 years ago. It’s quite comfortable and there’s enough elbow room for everyone to live happily here, whatever religious, political, philosophical, or other differences we may have. There are people from all	Comment noted. Refer to Common Response #14 for the City’s response to comments about the Southcliff neighborhood.

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	walks of life here, with many different income levels. Neighbors generally respect one another's space and many will help one another when needed. With the way Southcliff was laid out, we have only three ways to enter and exit this neighborhood, all coming off of Mill Plain. To have our entrances built up with commercial and residential high-rise buildings makes absolutely no logistical sense. Hundreds of new units, lots of people, no parking and no back way out of here? How about this idea instead: There are a number of areas in Vancouver that have shut down or failing businesses. Identify those and make them a model of newly constructed mixed-use residential/commercial spaces. Many of these failed places are closed storefronts and the huge, sprawling malls, which are out of date and impractical with extremely large single-story footprints and lots of parking. They could be designed to house many residents in multi-level buildings, provide convenient shopping within walking distance, and offer public transportation to central areas of the city. (Much like the plan in place now for the old Tower Mall Site in the Heights District, but in a much larger space.) The Pacific Northwest has a very desirable climate, Washington State is beautiful and well-run, Vancouver has a thriving little downtown and a great school system. We're near the coast and the mountains, close by a world-class international airport, convenient to jobs, and next to Portland. Of course people will want to live here. I believe we will be having a significant influx of climate refugees into our area as time goes by, in fact it's already happening. We've met a number of people who have fled the wildfires in California after losing their homes, and talked with a guy who moved his family here from Arizona, where it's become so hot their young kids couldn't play outdoors at all. In addition to these newcomers, there will be the people who will be born here who just love it and want to stay close to family. We know we have to plan for this. Let's be smart about it. Let's be open-minded and flexible in how we see our hometown, and look at the space around us, what we've got to work with. In doing this, we can preserve our historic neighborhoods that have been thriving for decades, like Southcliff and others, communities in Vancouver that have been a great place to live for so many years. Let's revitalize, rethink, and rebuild the spaces that need a different, more progressive model, and will be well-suited to this job. What an opportunity we have in all these failed commercial enterprises that can be re-zoned to be mixed-use commercial/residential sites. If we are prepared, this population increase will be something we can welcome, and handle what is coming. With good planning and forethought, the mind-set in our community will be more stable, and more able to deal with this population growth. Speaking on behalf of the members of this community, I'd like to say thank you, to each of you, for taking part in this process. And let's be a model for other states in our country who certainly will be facing these same issues."	
250	"My name is Terrence G. Popravak and I live at [address] in the Southcliff Neighborhood. I have reviewed the City's draft EIS and proposed zoning changes. I am adamantly against either Alternative 1 or Alternative 2 as the City has currently proposed. Southcliff is a historic mid-century modern neighborhood which should be preserved as it is, and not destroyed by the city to make room for people presumed to be here by some estimates by 2045. There is no logic in these proposals to renovate or savage one of the best, if not the best, residential neighborhood in Clark County. You reason that is for a proposed influx of residents while the current birth rate is at below replacement levels. Where are the presumed immigrants coming from? I moved to Southcliff in 1988 because of its quiet, walkable streets and mature, beautiful trees. These alternatives would demolish that with their destruction of single-family homes, trees and greenspace, as well as replacement of these with structures forcing exponentially more traffic and parking into the neighborhood. These alternatives also completely disregard Southcliff regulations in place since 1954 provide for one single-family dwelling per lot no more than two stories high. Both alternatives violate these regulations.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	In addition, construction of commerical/mixed-use high-rise buildings in the Southcliff area would have these negative impacts: 1. Destroying the social fabric of the neighborhood by forcing existing members of the community out of their long-existing homes, thereby severing the ties between neighbors and friends, those forced out and those remaining. 2. Loss of mature trees and habitat benefitting residents and wildlife 3. Significant degradation of the quality of life for remaining Southcliff community members from the proposed commerical and high-density housing activity due to: a. Reduced vehicular and pedestrian access as neighborhood streets are encroached upon for access and parking of new construction b. Increased traffic and parking congestion c. Increased pedestrian and cyclist safety hazards d. Increased environmental noise pollution e. Increased vehicle pollution from exhaust as well as petroleum, oil and lubricant leakages. Our neighborhood rain garden was designed to help remove pollutants in rain water runn-off based on the current number of vehicles. Adding prospectively hundreds of cars to Southcliff streets would greatly increase the volume of pollutants. Paving over more of the surface area would greatly increase the run-off, with environmental impact downstream of that flow. When the city presented its plan for redevelopment of the Heights District, particularly the former Tower Mall area, it was billed as the place in this part of Vancouver where commercial/mixed use high rises would be built, not encroaching whatsoever into long-established neighborhoods. If the city believes it needs more high-density housing, if your concern is about estimated population growth, why not consider lifting up some of the neighborhoods that are in rundown condition and have an above average crime rate? Consider alternate sites in neighborhoods like Central Park, North Garrison, Shumway, Fruit Valley, Bagley Downs or Rose Village. I feel this proposal is nothing more than a top-down, globalist view of how people should live. This collective mentality is nothing more than a euphemistic platform to control how people should exist in their daily lives. As such I cannot support either alternative which you are proposing."	
251	There is some confusion about how properties currently zoned CN may be used in the future if the zoning changes to medium density residential. Should we expect grandfathering of the designation, or reverting back to medium density residential? Will we be allowed conditional use in the interim?	Comment noted. Refer to the draft Zoning Code on BeHeard Our Vancouver for more information regarding updates to Vancouver's Zoning Code.
252	I believe the city should adopt the Alternative 2 zoning map. I think the city should be aggressive in planning for many types of development and housing. Just because an area is zoned for more density doesn't mean that it ends up getting developed that way and allowing for variety and flexibility in the development of our city over the next 20 years is going to serve us well when it comes to addressing whatever challenges may arise. I like Alternative 2 and wish it went further in zoning more of the city as mixed use.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
253	I think Alternative 1 best balances the needs for increased development and preserving quality of life for existing property owners and residents, the environment, and demand on public services.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
254	"Based on the provided text, the main themes and points to be summarized in a city planning document review are as follows. Strategic Growth and Vision	Comment noted.

ID	Full comment	Response
	Vancouver faces significant population growth, with an estimated 200,000 new residents to come over the next two decades. The city's current infrastructure and urban boundaries are insufficient to support this expansion, leading to a reliance on resources outside the county. The proposed Neighborhood Center Strategy aims to address these challenges by creating self-sufficient, mixed-use hubs within the city. This approach is designed to: Accommodate growth within existing urban boundaries, preventing sprawl into rural and natural areas. Foster a more independent and resilient local economy. Protect the unique character of existing communities. Key Principles and Focus Areas The plan focuses on three core areas to achieve its goals: Housing Development and Community Character: The city's current housing stock is predominantly single-family homes, with limited land zoned for multifamily housing. The plan proposes increasing density, especially in the central districts, to an average of 13-14 units per acre. This would be achieved by focusing on the Neighborhood Centers, which would feature a variety of housing types and densities. Transportation Planning: Currently, a majority of residents rely on private vehicles, and the existing transit system is insufficient for future needs. The plan aims to significantly increase public transit ridership by 2045 (from 33% to 48% of commuters) through a robust, high-capacity rail and bus network. This will reduce traffic congestion and connect the new Neighborhood Centers, attracting both housing and business investment. Economic Independence: By improving housing and transportation infrastructure, the city intends to attract businesses and create local job opportunities. This will reduce residents' dependence on jobs in neighboring cities, creating a more sustainable and independent local economy. Conclusion The document presents a comprehensive vision for managing growth and ensuring financial stability by focusing on compact, integrated development within the city's existing urban growth boundary. The scenarios provided are a starting point for community discussion to ensure the plan aligns with the diverse needs and desires of residents."	
255	We need as much affordable and middle housing as possible. Less parking spots! Less car friendly infrastructure in our downtown. Make it walkable! So much noise pollution from noisy cars.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #8: Housing Affordability/Options and Common Response #10: Businesses in Residential Zones for more information on those topics.
256	"Housing and Growth Clark County has seen significant population growth over the past few decades, which has led to issues such as a reliance on jobs outside the county, a limited housing supply, and increasing traffic congestion. These problems will only worsen unless we create a thoughtful strategy for growth that addresses housing, transportation, and job opportunities while preserving the county's history. The comprehensive plan does a great job of addressing these issues. To make it successful, we need to allow significant portions of Vancouver to have mixed-use zoning and update our zoning codes and development restrictions to allow for a wider variety of housing types and densities on smaller lots. Addressing Transportation Needs Public transit ridership is currently low due to a disconnected system with limited destinations. This lack of investment hinders public support for future expansions. By implementing effective strategies, we can make transportation a cornerstone of future development, attracting housing and businesses and creating a more connected city. It's	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.

ID	Full comment	Response
	essential to learn from our neighbors in Portland and Seattle, adopting their successful approaches while avoiding their pitfalls. Developing Bus Rapid Transit and potentially Light Rail Transit along major corridors like Hwy 99, St. John's, 4th Plain, and Mill Plain can support higher-density housing and attract businesses, making Clark County more financially sustainable and independent. A Sustainable, Independent Economy Our city and county are heavily dependent on job opportunities in Portland, a reliance that is unsustainable. By improving our transportation and housing infrastructure, we can attract investment and businesses, improve access for existing companies, and create new economic opportunities for residents. A stronger housing market and better transit access will lessen our dependence on outside jobs and amenities, creating a more accessible and sustainable economy. This will also help current residents avoid being priced out of the city, a common problem due to our limited job market. Creating a Vibrant Cityscape Current development patterns often lead to limited housing options and disconnected neighborhoods. Our resistance to new developments results in products that fail to meet housing demand or improve access to amenities. This approach does little to increase density or variety and can disrupt the historic character of Vancouver. Furthermore, our current transportation capacity is unlikely to keep up with growth, potentially leading to highway expansions that divide neighborhoods and still fail to address traffic issues. By prioritizing a mix of housing types and promoting mixed-use neighborhoods, we can create unique and beautiful urban spaces while preserving the rural character of our county. The comprehensive plan does a great job of addressing many of these topics, and I want to highlight a few that are crucial for the comprehensive plan to be successful."	
257	The population you are attracting to Vancouver is not good. Low Income Housing is encouraging more people to come over from Portland and these people are responsible for the rise in crime. Drive through these projects and count the vehicles with Oregon plates. Our city and County is full of them. We need "for sale", reasonably priced (under $500k) multi-family housing in the waterfront. I would prefer buy a decent one bedroom condo downtown or in the waterfront and they don't exist. I am a single person with a good income but had to buy a house in east Vancouver because it was all I could find in 2020. There was nothing I could afford downtown and that was where I wanted to live. Vancouver is nothing but apartments and it's ridiculous to read that you are focused on "low income housing" in the waterfront. This city needs to focus on making it affordable for builders to create high density "for sale" projects in the downtown area. East Vancouver needs a nice mixed use for sale area with nicer shops and restaurants, something like Bridgeport village but with condos upstairs from retail. Nice outside patios to enjoy a meal or wine at. Instead it's strip mall central with asphalt parking lots. Does no one in city planning have a clue what a nice community looks like? Vancouver could be such a nice place but you are destroying any hope for it to attract solid, middle class people that take care of their homes and cars and don't steal from their neighbors. Please wake up.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #8: Housing Affordability/Options for more information on these topics.
258	"My wife and I want NO CHANGE!!! We don't want BIG BUSINESS and Apartments/Condos in our neighborhood (Village of Fishers Landing)!! We bought our property 10 years ago; there was no indication/disclosure indicating that our subdivision was subject to re-zoning. We bought for the peacefulness, beauty, and location relative to community services (doctors, hospitals, restaurants, etc.). For our city government to unilaterally change this environment is outrageous and most likely illegal. Our city government is treating this MEGA CHANGE PROJECT the same way they did with re-purposing of our streets (bike lanes). The decision was already made by the government, but it went through the motions to make the citizens think they had a choice. You treated us like children! Our opinions didn't matter whatsoever, even though some neighborhoods objected vehemently. You changed the rules of the game midstream do defeat the citizens and proceed with your flawed plans. Hardly anyone uses the bike lanes!!!	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	We understand our City is taking its planning marching orders from the State. Apparently no one in our City government opposes those marching orders. Otherwise , you would react like our State government does when the US President writes an Executive Order that our State doesn't like....LAWSUITS!!! It is our opinion that we have no free thinkers in our city government, just good soldiers marching to the orders from the State and being highly influenced by Developers and BIG BUSINESS. Your plans are REGRESSIVE and REPRESSIVE!!! I can't say enough about how strongly we OPPOSE your already-in-place-plans. I also can't believe I wasted my time writing this letter. I'd be highly surprised if anyone reads it. And, in case you didn't catch the flavor of this letter, WE OPPOSE your processes, your plans, and your being so heavily influenced by developers, big business, and the State!! WE VOTE NO CHANGE!!!!!"	
259	"My name is Robert Douglass and I live at [address]. I write to address and list my objections to the proposed commercial/mixed use rezoning along Mill Plain, just west of the Heights Redevelopment (RAC) project which is already in place. Specifically, I find Alternatives 1 and 2 to be particularly deleterious to Southcliff neighborhood, where I have lived for the past 33 years. My first concern is the amount of traffic and parking which would result from rezoning. It would crowd our streets and endanger the pedestrian traffic, as the neighborhood streets are set up in the mid-century style – wide streets and without sidewalks. There would be no access to proposed businesses directly from Mill Plain as it is a main arterial, instead it will be from it's parallel Oregon Drive – a now pleasant street with dead ends at either end, and which also connects to two small cul-de-sacs. Development along Mill Plain (and thus Oregon Drive) would place no interior neighborhood home further than 6 to 7 houses away from stated development. With increased traffic, I can easily imagine speeders and frustrated drivers who are searching for parking to be a danger to those walking their dogs, riding bicycles, or just being out in the neighborhood. My second concern is for the impact on the currently beautiful environs of the neighborhood. We have a broad 47% tree canopy in the neighborhood, and Mill Plain itself is a nicely shaded boulevard on the strip in question. New construction will undoubtedly alter/eradicate much of this significantly. It will drive out birds, squirrels, deer, and other wildlife. This is another benefit of living here – to be able to enjoy nature in a city environment. Other residents will write with more authority about the technical aspects of the watershed along Blandford Canyon, and this has been well studied and documented with our recent rain garden project. It is doubtful the area could accommodate more structures right here with environmental safety – we seem to be at our limit. A third concern, one dear to me as someone interested in history, is the mid-century modern story of the neighborhood and it's design. It came about during the mid 1950s post World War II exuberance following the removal of the temporary housing of the Kaiser shipyards. The layout of the streets: broad, and without definite focal point, the design of homes: many are ranch style, a few more daring in their architecture, altogether are outstanding examples of the period. Many vestiges of that time remain in the neighborhood and are worthy of preservation. The Washington State Department of Archaeology and Historic Preservation representative we contacted has been enthusiastic in encouraging us to seek official designation, even up to the national registry level. I believe this history should be honored. CC&Rs were written at the very inception of this beautiful enclave purposefully for this to be a neighborhood of single-family homes. Commercial buildings, high rises, or other such structures would be incompatible with the character of the neighborhood and violate the CC&R rules. A very reasonable alternative to the commercial district proposed along Mill Plain is the fact that the Heights/RAC project is directly adjacent and planning for that development is nearly complete. Southcliff has been involved with that from the beginning, and overall looks forward to its construction and having that area fulfill the goals of increased housing and commercial activity. As far as the current proposal affecting Southcliff, planners should have walked the streets, familiarized themselves with the neighborhood, and involved homeowners long before the EIS	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	stage. Residents here are not opposed to change, but feel it should be step wise, needs based, and well thought out. Alternatives 1 and 2 do not fulfill that. Another potential fear of mine is the "domino effect" – where development of one parcel occurs making it inevitable that close or adjacent properties will follow. This may cause alienation amongst neighbors, diminished property values, further selling out, with the end result being homes in a once beautiful and historic area succumbing to the developer's sprawl. What an absolute shame that would be – and I am sure across the country (and the world) there are many instances where cities and planners have gone on to regret losing beautiful and significant places for shortsighted goals. Perish the thought. As a final comment, in my attendance at sponsored presentations, I sometimes found the attitude of some planning staff to be that Southcliff is just another "affluent" neighborhood and that residents here somehow owe a "debt" to solve the housing shortage because we have "housing security". I find this largely insulting, as it unfairly places what is really a greater societal issue as somehow being the responsibility of targeted homeowners. I recognize the need for and am a firm supporter of the creation of affordable housing, and would prefer to offer the benefit of the doubt for my observations above, but I don't think anyone should be made to feel guilty or overly privileged for living in a nice neighborhood. As further final comment, I would also request that these, and perhaps all comments be readily available to the City Council, who will be the final arbiters of these proposals. Sincerely, Robert Douglass [address] [phone number] [email address]"	
260	Do not make changes to Vancouver's Historic areas. This is the one thing that sets Vancouver apart. I am a second generation Vancouver resident. It would be a crime of any current Historic areas were taken away or re allocated for housing. We have a unique treasure.	Comment noted. Refer to Common Response #12: Neighborhood Character for more information.
261	"Hello, My name is Connie Pappas and I live at [address] in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2as currently proposed. What a gorgeous neighborhood! I have lived in many places in Vancouver, (condo in Loowit Loop, Officer's Row, Steamboat Landing) but when we sold our home in Steamboat Landing in 2009 and bought a condo in Portland only to sell it in 2013 (not the condo type, lol) and discover the best kept secret in Vancouver. Southcliff. We love the midcentury houses and were lucky enough to stumble upon a fixer. But with all the time and house scouting on the West side of the city, we never saw Southcliff. Swoon worthy beauty! The tree canopy and easy access to downtown, both Vancouver and Portland and there was our house. My only regret was that we didn't discover it sooner! Back to the alternatives... Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. We have an abundance of wildlife we tend to in our own yard. I understood that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	I moved to Southcliff for its spectacular beauty and the quiet, walkable streets and beautiful mature trees. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating congestion on those streets not to mention safety issues for pedestrians and cyclists. It's already challenging being a cyclist or walker because drivers are distracted and some bike lanes and zones are not clearly marked. Our neighborhood rain garden was designed to help remove pollutants in rain-water run-off based on the current volume of vehicles. Adding more cars and the constant traffic of cars to Southcliff streets would greatly increase the volume of pollutants which will add more impervious surfaces and increase run-off. Southcliff is a marvelous, historic mid-century modern neighborhood that should be preserved, celebrated, even appreciated as is. It's such a rare neighborhood in Clark County and it should not be compromised or altered by the City. Living in Southcliff is something I could never have predicted. I always wanted this neighbohood and this house and it's been a true labor (and labor of love) to bring it back to its former glory but better. Neighborhoods like this should be protected and nurtured. The City should be proud of them. Celebrate them as we approach the century they've been around. That's progress too! Thank you for your time. Constance Pappas [address]"	
262	"We are writing to formally request that the zoning designation of the two parcels located at [addresses] be treated the same as [address] and either be upzoned to Mixed Use or left as R-22 zoning. For context, we recently acquired the Pacific Pointe Apartments located on [address] as well as the two adjacent parcels at [addresses]. All three parcels are currently operated as one cohesive rental apartment community for middle income residents of Vancouver. Under current zoning, the possibility exists to add additional rental housing to the complex – under alternatives 1 & 2 of the proposed re-zoning, this much needed additional workforce housing would not be permitted. All three parcels are currently zoned R-22 Higher Density Residential. In the July 2025 Comprehensive Plan update, zoning proposals "Alternative #1" and "Alternative #2" seek to down zone [addresses] to Low Scale Residential while upzoning [address] to Mixed Use. It is our understanding that the City has a desire to increase the supply of middle-income housing – we strongly believe that the downzoning of [addresses] is not aligned with this policy objective. For clarity, we have attached snapshots of the parcels in questions below. Thank you for your attention to this request and we look forward to hearing back from the planning committee on how we can best help the City achieve its long-term goals. Best, Crown Point Real Estate Partners Jamie Robertson [phone number]"	Comment noted. The Preferred Alternative would zone these properties as Mixed Use.
263	"My name is Charles Hankel, and I live at [address], in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. My reasons for opposing these alternatives are:	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	1. The safety of the community and the residents of our neighborhood. I have lived in the South Cliff neighborhood going on 6 years now and the intersection of Rhododendron and Mill Plain is ridiculously dangerous. There has been at least 1 major accident a year. We had a drunk lady drive her car through our cinder block wall. Yet, zero precautions have been taken to make this intersection safer. What's even worse, the city put in a Vine bus stop there. Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. I understood that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. I moved to Southcliff for its quiet, walkable streets and beautiful trees. This is a safe neighborhood, you can walk your dog in the middle of the night without worry's. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating huge congestion on those streets not to mention safety issues for pedestrians and cyclists. Our neighborhood rain garden was designed to help remove pollutants in rain-water run-off based on the current volume of vehicles. Adding hundreds of cars to Southcliff streets would greatly increase the volume of pollutants. And adding more impervious surfaces would greatly increase run-off. Southcliff is a a historic mid-century modern neighborhood that should be preserved as is and not destroyed by the City just to make room for people who might (or might not) move here by 2045."	
264	I support the increased development of mixed-use neighborhoods from industrial/employment. The increase in these neighborhoods seems to me to best support the two primary goals of increased housing and increased jobs.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
265	Prefer Alternative 2	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
266	"6 September, 2025 Greetings, My first comment us a question. Why would a Intelligent group of city leaders want to turn a long time High level Neighborhood into a mid to low scale neighborhood ? We are composed of a majority of older, more responsible and helpful volunteering segment of the city's population. We don't stay up late at night, have loud parties, or misbehave. No police calls, we are your best kind of neighbors. Most of us have lived here for many years. We are stable neighbors – The Ideal Kind of Neighbors...! We maintain our properties, clean up our streets, have no trashy derelict automobiles parked about our homes, or have junk in yards. We are the kind of neighbors you would want to have as your next door neighbor. Now add in 1340 residential units at the Tower Mall Area not a block away and you are going to make parking on our local streets very busy. How would you like having 6 story apartments across the street from your house...? Thank for the time and space for my comments, Robert Cravens"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
267	My name is Marise Scott and live in the condominiums called Madrona Lane. As President of our Association, I am writing with our concerns regarding the impact to Southcliff and surrounding neighborhoods. We are against the adoption of both Alternate 1 and 2 as proposed. Our reasons by adding commercial and mixed use to well established neighborhoods create a construction nightmare for residents. Losing the mature trees and habitat for wildlife is definitely against the City's Master Plan of Tree Green Space. It was our understanding the Heights District development was to be commercial and mixed use high rise buildings. The impact of traffic on Mill Plain is already destroying the walkability of the neighborhoods with cars running red lights. On the corner of Brandt and Mill Plain there have been a minimum of six accidents careening into fences and homes within the past two years. As planners, the traffic litigation will only increase as high density housing will create more traffic entering Southcliff, DuBois, Madrona Lane and the Height neighborhood. This plan will destroy the walkability of the neighborhood. As a spokesperson for Madrona Lane, we are definitely against these proposals.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
268	"My Name Lance Shaffer and I live in Southcliff neighborhood. I have reviewed the Zoning change proposals being put forth in the City's Draft EIS, Alternative 1 and 2. I am against both adoptions. Both alternatives violate Southcliff's Regulations which only allow the single family dwelling per lotto no more than two stories. Regulation in place since 1954. I invested hundreds of thousands in my property, developing a safe environment for my family. This rezoning proposal will destroy this mid-century neighborhood."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
269	My name is Angela Shaffer and I live at [address] Vancouver Wa 98661in the Southcliff neighborhood. I moves to Southcliff for its quiet, walkable streets and beautiful trees. Adding Commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet and walkable.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
270	I have a home in both the west and central sections of Vancouver. I wanted to provide comment on the shift in zoning presented in Alternative 2 that shifted the heavy industrial area between SE Columbia Way and the river to the south to Regional Activity Center zoning district. My feeling is the land along the river offers greater bennefit to the City of Vancouver residents and businesses if the current industrial lands were replaced with additional waterfront developments (hotels, restaurants, apartments, etc) that could serve all resdients and visitors verses the few industrial tenants located there now. The Port of Vancouver provides much better property downstream for industrial facilities. I also feel the elimination of these industrial businesses would promote a better Insterstate 5 bridge design by lowering the current Coast Guard bridge height requirement.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative would include a mix of Regional Activity Center, Medium Scale Neighborhood and Parks Land between SE Columbia Way and the Columbia River.
271	Please stop filling up the Waterfront with rental housing. It creates a massive transient community with people continually moving in and out. Let's plan for a more permanent community where people can buy property, invest time and effort towards getting to know the shop and restaurant owners and work towards making the waterfront a better community.	Comment noted. Refer to Common Response #8: Housing Affordability/Options for more information.
272	I would really like to see the "middle income housing" actually come to fruition. Seniors such as myself, whom are disabled veterans seem to supposedly make too much from disability, soc security etc but not enough to pay for market rate apts without a struggle along with the general cost of living. We end up moving every 2 yrs because we can't afford where we live or the rent increases. As we continue to age, the constant moving gets harder especially if you are a single senior with health challenges & mobility issues. So for years we've just continued to read about the coming middle housing & struggle thru hope for the housing that will allow us to "age in place". Even those that receive taxpayer money for the newer bldgs make sure their rent prices are kept high. So we can't get a decent apartment in return & are still priced out of their units. How is this allowed to continue?	Comment noted. Refer to Common Response #8: Housing Affordability/Options for more information.
273	"My name is Nathan Petz and I live with my wife, Carrie at [address] in the Southcliff neighborhood. Our family moved into Southcliff in 2006 and our children grew up here. We have reviewed the zoning change proposals being put forth in the City's Draft EIS and are against the adoption of both Alternative 1 and Alternative 2 as currently proposed for the Southcliff neighborhood. Our reasons for opposing these alternatives are as follows.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. For the past 70+ years Southcliff has been, and still is, a neighborhood where children can safely ride their bicycles on the quiet streets and where neighbors out for a walk often stop to converse. All of which provide a sense of community that is often absent from newer developments. The rezoning proposals noted above will increase neighborhood traffic and parked cars along our streets, making those streets increasingly unsafe for children and other pedestrians. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. In summary, Southcliff is a community and family centered historic mid-century modern neighborhood that should be preserved and not be destroyed by commercial and high rise buildings, so we very much oppose the Alternate 1 and Alternate 2 plans. A more practical and less impactful option for increasing population density in the immediate area is the Heights District redevelopment. Thank you for your attention to this matter. Nathan and Carrie Petz [address] Vancouver, WA 98661 m:[phone number]"	
274	"I read the city manager's newsletter and as I understand it, the middle housing option he described is something I favor because it tries to solve several problems I see. We have a housing shortage that at the worst puts people on the street, forces us to pay more than our budget allows, makes us choose substandard housing to fit our budget, or causes us to seek housing farther away from our jobs/families. Having the middle housing options also gives us the alternative to travel more on a human scale. I like to walk to the store. I like the plan that lets more housing and retail intermix so I don't have to drive across town for everything. I hope you select the plan that gives us the most choices."	Comment noted. Refer to Common Response #8: Housing Affordability/Options for more information. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
275	"My top priorities for Vancouver's future are housing, transportation, and climate. A housing map that gives us more choices in type, location, and cost, will make it easier to also improve transportation and climate issues. The Vine is growing and I hope CTran continues to expand smaller bus lines to connect to it. I walk, bike or bus whenever possible – year round. Putting retail and housing closer together with connecting bus routes helps me avoid almost all car trips – which I use mostly when I'm stocking up on heavy or bulky items like bags of cat food or toilet paper. Since the city published the first climate map (2019?), I've been especially conscious that what I do matters. Cars are convenient, no doubt about it. But I know quite a few people who just don't drive. For those of us walking or biking along roadways, we know vehicles are noisy, smelly, and dangerous to the health of plants and all of us animals. Please select a housing map that creates denser housing options, better transportation connections, and a safer, healthier population and planet for our entire city, not just select neighborhoods."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
276	"My name is David Rice, MD, and I live at [address]. I am writing because of my deep concern about proposed zoning changes that would greatly affect our neighborhood of Southcliff. I have reviewed the zoning change proposals as presented in the City's draft EIS. I am strongly opposed to both Alternative 1 and Alternative 2 as they are currently written. Both are directly in opposition to our neighborhood regulations which have been in place since the 1950's and limit lots to single family dwellings and no more than two stories high. Ignoring these regulations to allow for commercial and multistory buildings would destroy our neighborhood. Southcliff is an oasis from the bustling city	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	around us. If these changes happen, there would be a dramatic increase in traffic flow which would endanger the many children and adults that use the neighborhood streets for recreation and socialization. Some of our beautiful old trees would likely need to be removed for new construction, leading to irreplaceable loss of their beauty and habitat for animals. This would also likely raise temperatures locally as trees are known to help reduce heat on sunny days. We are also concerned about property values, as the neighborhood's unique charm and large lots lots would be lost along the with appeal to potential future buyers. Southcliff is an historic gem and should not become subject to zoning changes that would forever harm it's character and turn it into a less desirable and less safe place to live. Respectfully, David S. Rice, MD"	
277	"Dear City of Vancouver, I'm writing to share my concerns about the proposed zoning changes that would affect our neighborhood of Southcliff. I've looked over the draft EIS, and I believe both Alternative 1 and Alternative 2 would cause real harm to our community if they go forward. Southcliff has always been a quiet, safe place to live. It's where kids can play outside, neighbors walk their dogs, and families gather in their yards. The changes being suggested — allowing larger buildings and commercial development — would completely shift the feel of the neighborhood. Here are some of the biggest worries I have: Parking and congestion: Our streets aren't built to handle extra cars from new businesses or big apartment buildings. Parking is already limited in some areas, and more congestion would make things frustrating and unsafe. Noise and light pollution: Commercial or taller buildings would bring more lights, deliveries, and late-night activity that would disrupt the peaceful environment that makes Southcliff so special. Strain on schools and services: Adding more housing density would put pressure on our local schools, which are already crowded, and on city services like water, sewer, and emergency response. Loss of privacy: Taller buildings right next to single-family homes would mean neighbors suddenly looking down into backyards where families have always enjoyed privacy. Southcliff is unique because it feels like an oasis inside the city. The trees, the quiet streets, and the long-standing single-family zoning are what drew families like mine here in the first place. Changing that would take away the character that has made this neighborhood thrive for decades. I ask that you listen to the residents who live here every day and protect what makes Southcliff a safe, family-friendly, and desirable place to live. Sincerely, Yvonne B. Rice"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
278	"To the City of Vancouver, My name is Enzo Rice, and I am 15 years old. I have lived in South Cliff for 13 years, and I am writing to share my concerns about the proposal to rezone our neighborhood to allow commercial use and multi-family housing. South Cliff is a very special community. It is peaceful, safe, and family-friendly. One of the things I love most about living here is how welcoming it feels — neighbors walk their dogs, kids ride their bikes, and families go on walks together. It is a place where people feel comfortable being outside. I worry that if our neighborhood is rezoned, the increase in cars and traffic will make it harder and less enjoyable for people to do those things. I also feel safe in South Cliff in a way I don't always feel in other parts of the city, such as downtown or on buses. That sense of safety is very important to me and my family, and I am worried that adding more commercial businesses and	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	dense housing will take that away. South Cliff has a unique character, and it is one of the few neighborhoods where families can really enjoy the outdoors without the stress of traffic or crime. I completely understand that our city is growing and that there is a need for housing and development. But I believe changes like this should be carefully thought out so that they do not damage the neighborhoods that are already thriving. South Cliff is thriving right now, and rezoning could put that at risk. I believe it would be better to direct new development to areas that already have more businesses, bus routes, and infrastructure, such as downtown, instead of changing a neighborhood that is working well the way it is. I am still young, but I care deeply about my community. South Cliff has been my home almost my entire life, and I hope it can stay the safe and beautiful neighborhood it is today. Please take into account the voices of families and residents like me who want to preserve the qualities that make this place so special. Thank you for your time and for listening to my perspective. Sincerely, Enzo Rice"	
279	"Dear City of Vancouver, My name is Leo, I'm 13 years old, and I've lived in Southcliff almost my whole life — 12 years. This neighborhood is where I learned to ride my bike, play basketball in the street, and walk to my friends' houses without my parents worrying. It feels safe here, and I don't want that to change. I've heard about the proposed zoning changes, and honestly, they make me nervous. If Southcliff gets turned into a place with bigger buildings, more cars, and fewer trees, it won't be the same neighborhood I grew up in. The streets where kids like me play would become busier and more dangerous. The big trees that give shade in the summer and make everything feel calm might be cut down. It's hard to imagine losing that. I know I'm just a kid, but this is my home. I don't have a say in big decisions like this the way adults do, but the choices you make now will affect my whole future here. Please think about what it would mean for kids like me if Southcliff turns into just another busy part of the city instead of staying the safe, quiet neighborhood it is. I hope you'll protect Southcliff, not change it into something unrecognizable. It would be really sad if, when I grow up, I can't show my own kids the same neighborhood where I made so many good memories. Sincerely, Leo Rice"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
280	The example you listed of Mixed-use is leading people to buy into what you want for certain areas, such as Southcliff and the Heights, which is a huge mistake.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
281	I support Alternative 1, which offers a more balanced approach by designating Hudson's Bay as a Medium-Scale Neighborhood. This option still meets the City's projected housing and job needs while preserving the neighborhood's existing character and housing mix. Hudson's Bay is uniquely situated along Evergreen, a corridor the City has long envisioned as walkable and connected. Pushing the area into Mixed-Use density under Alternative 2 would intensify traffic and simultaneously pedestrian safety, plus light and noise pollution—already a challenge given the neighborhood's hilltop location next to Grand Avenue and just south of Mill Plain— and would put homeowners at risk of displacement in favor of large rental developments. Rather than improving livability, this change would erode it. Preserving Hudson's Bay's historic charm and proximity to Fort Vancouver, one of the City's greatest public assets, should be a priority. Alternative 1 achieves growth goals while protecting the integrity and character of this special neighborhood.	Comment noted. Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
282	I want to make comments regarding on the impacts of proposed alternative zoning changes on my neighborhood, Southcliff	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
283	I have recently been made aware that the city of Vancouver is wanting turn the northern border of Southcliff neighborhood into mixed use housing and retail. When my mother recently told me, I was outraged. Southcliff is where I not only grew up, but it is the neighborhood that shaped me. I have grown to be a leader in my field and a thoughtful human being. It is one of the last beautiful areas of original Vancouver that is quiet, free of crime and well maintained by it's inhabitants. Countless community leaders have resided there for the past 60 years and this is how the city thanks them for their community efforts? To turn their neighborhood and homes into not only mixed use housing, but also to decrease the value of their homes that they have worked so hard to obtain? This seems like robbery and penalizing good hardworking/contributing citizens for their tireless efforts. I voted for our current Mayor in the last election, as I thought she was doing good things for our community and if this is her stance, I was clearly wrong in my vote. There are so many areas in Vancouver that can benefit from mixed use housing, but Southcliff and Dubois Park are not two of them. If our city continues to demolish Vancouvers history, and not honor it, then in 2045 and beyond, we will have nothing to reflect on by my Grandchildren and those of their generation. In the last few years, the city tore down Tower Mall and continues to do NOTHING with that piece of property. Now, behind closed door shady dealings, they want to kick Southcliff homeowners out of their hard earned homes for no good reason and rezone areas that have been inhabited for 50+ years. Are they waiting for my family to die off so they can take what was earned with hard work? I'm embarrassed and outraged if this is what our current Vancouver "leadership" is choosing do to, and if that is the case, I will give my personal vote elsewhere.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
284	I am concerned that the number of high heat areas will increase as a result of the building that is done. I live south of the 162nd Blvd., Northeast that in the last few years has had massive, massive warehouses built on land that previously was completely covered or almost completely covered with deciduous trees. There were a few evergreens too. It is right next to and abutting to a residential area and overtime will significantly increase the temperature of the residential area, adjacent humongous concrete buildings that involve massive amounts of trucks and cars going in and out of those buildings because they distribution centers When there is no direct freeway access significantly degrade the adjacent residential areas. If such things are going to happen, they need to happen so that there is a proportionate revenue increase for Vancouver and all of its residents. I do not think that happened in the case of these two massive warehouses and your plans to add more stuff just like that in the few blocks remaining between them and the residential neighborhood and the watershed the watershed is right there.. as it stands now people can cut down trees on their property. I saw building going in right now off of 18th St. and they took out 30 3540 I don't know many Douglas to put in houses there needs to be some kind of plan to mitigate the loss of that many mature Douglas firs. As far as I know in my experience so far in Vancouver, it seems like removing trees for construction is Jim Dandy fine.	Comment noted. Refer to the Plants and Animals sections of Final EIS Chapter 4 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts. Refer to Common Response #4: Vehicle Traffic Impacts for more information on that topic.
285	"Sept. 7,2025 To: City of Vancouver: City Council, City Planning Commission & Others Re: Draft EIS and zoning change proposals My name is Chris Keinath, and I live at [address] in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS, and am strongly opposed to the adoption of both Alternative 1 and Alternative 2 as currently proposed. When I drive along E. Mill Plain Blvd from MacArthur to Rhododendron, it always brings a smile to my face. A beautiful tree-lined street; peaceful and exemplifying the charm of a Vancouver neighborhood. (contrast this, if you will, driving east along Mill Plain from I-205 to, say, Morrison: Ugly, tacky, and an example of what should not be characteristic of our City). The proposed changes seem to disregard what makes Vancouver USA such a wonderful place to live: Neighborhoods that people cherish. Community. Beauty. Peaceful and Safe. Historic. The Southcliff neighborhood, of course, is an example of all of these. The EIS draft proposes significant changes that could drastically alter the character of Southcliff; and thus is unacceptable.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	There certainly must be undeveloped/underdeveloped land within the city boundaries that could accommodate State mandates, without the fear of destruction of the character of established neighborhoods. ?? I am also concerned about other neighborhoods, and fear greatly a precedent that would introduce the sort of development that has been seen, for example, in North Portland. Worse: a move toward "Brutalist Architecture." NO. Please, not here; not in Vancouver. I echo many of the other comments that many of my neighbors have made (copied below). Thanks much for your kind consideration, and may you proceed with Wisdom—not expediency. Sincerely, Chris Keinath Additional comments from my Neighbors Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings which would mean losing many mature trees and the habitat they provide for wildlife. I understood that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. I moved to Southcliff for its quiet, walkable streets and beautiful trees. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating huge congestion on those streets not to mention safety issues for pedestrians and cyclists. Our neighborhood rain garden was designed to help remove pollutants in rain-water run-off based on the current volume of vehicles. Adding hundreds of cars to Southcliff streets would greatly increase the volume of pollutants. And adding more impervious surfaces would greatly increase run-off. Southcliff is a a historic mid-century modern neighborhood that should be preserved as is and not destroyed by the City just to make room for people who might (or might not) move here by 2045."	
286	The Alt 1 classification of the very new development (townhomes and apartments) at 154th Ave and Fourth Plain as to be turned into Industrial/Employment is confusing. At the very least, it seems to me that it ignores the objective reality, which is that a bunch of stuff was just developed in the past 5 years and isn't going to change within this planning period. I understand the objective, which is to provide for more industrial land, but I do not think the Alt 1 vision for the next 20 years is realistic for this location. The Mixed Use classification in Alt 2 is more grounded in reality. Furthermore, in 2024, at a C-Tran meeting, it was shared that there's a concept of a "mini" transit center area with a number of transfer opportunities in the vicinity of 156th Ave. It seems to me that not mixing uses in proximity to a substantial transit facility like that would be a suboptimal use of that resource if its sole use became employment-related transit rather than a mix of things.	Comment noted. The Preferred Alternative would zone this area as Mixed Use Neighborhood.
287	Save Southcliff Neighborhood	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
288	"Save Southcliff Neighborhood September 7th, 2025 Dear Mayor and City Council Members, Our names our Steve Schmitt and Angela Paterson and we live at 801 Manzanita Way in the Southcliff neighborhood.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	When we moved to Southcliff in 2012, we discovered this hidden gem of a neighborhood. It is a beautiful neighborhood full of long-term residents and peace. Here, we've enjoyed walking our dogs, playing in our yard, and hosting friends and family in a safe and pleasant environment. You know your neighbor is always there for you. We have reviewed the zoning change proposals being put forth in the City's Draft EIS. We are against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. We understand that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. Already there are real concerns regarding parking and traffic to the Heights District which is adjacent to Southcliff. We understand the City must plan for 2045. We suggest if you haven't, please actually take the time to visit our neighborhood versus arbitrarily looking at a map only to rezone the city. We are confident this alone will give you pause and reconsider this proposal. Shape Respectively, Steve Schmitt & Angela Paterson"	
289	"Typo on page 94 ""The C-TRAN 2021-2016 Transit Development Plan"". 2021-2016 would involve time travel. Please consider updating the data so that the latest annual transit ridership data is considered -- the 2025-2030 TDP was recently posted to C-TRAN's website. Using 2023 or 2023 transit numbers as input to any modeling risks being a ""garbage in, garbage out"" exercise due to lingering effects of the pandemic affecting mode share. Further, writing that the 2021-20[2]6 TDP calls for a 10% increase to transit service is nearly pointless to a 20-year plan starting in 2025 -- those improvements have already been substantially realized, so what's next? Furthermore, the City's Climate Action Framework includes ""Strategy TLU-2. Shift driving trips to clean, active modes of transportation."" The RTC data included in the 2025 table depicts effectively unchanging mode share, with transit mode share slightly decreasing, bike mode share flat, and walking decreasing. This is utterly discordant with City policies and seems to defy logic. It makes no sense how improving sidewalks, improving bike lanes and pushing for bike storage in new development, and building denser mixed-use developments would result in flat bike use, a decrease in walking, and only a token increase in transit mode share. I'm well aware that regional transportation modeling borders on being junk science, but leaning on junk data for this plan threatens the value of this plan. If we take RTC garbage in, I am concerned that the transportation component of the comprehensive plan we get out will also be garbage, which is unacceptable in a climate crisis, because that will lock in a destructive status quo by steering investments toward antiquated and destructive modes of transportation."	Comment noted. The Final EIS has been updated to reference the C-TRAN 2025-2030 Transit Development Plan, which was not available at the time the Draft EIS was prepared. Please note that this update provides more current information for readers but does not affect the findings of the Final EIS analysis. The regional transportation model for the EIS analysis used 2023 data to represent existing conditions for consistency with the baseline year for the Comprehensive Plan Update. This is consistent with the 2023 base planning year for the Comprehensive Plan Update and census data used in related analyses. Given the three-year Comprehensive Plan Update process, a base year allowed staff to align and compare data while tracking key shifts and trends year-over-year. The City continues to monitor transit ridership, partner with C-TRAN, and align long-range plans. The Transportation section in Chapter 3 of the Final EIS uses the Regional Transit Council (RTC) data and model to analyze the potential impacts of the alternatives, which are generally differentiated by the extent and location of mixing of uses and residential density. The results of the RTC model are based on expected future population, housing, and employment growth and changes in land use under the different alternatives and on reasonably foreseeable future transportation projects. However, it does not factor in other policy and programmatic choices, like those noted in the Avoidance, Minimization, and Mitigation Measures subsection of the Transportation section. The City acknowledges that a model cannot fully demonstrate real-world potential impacts and used a variety of sources, including the Climate Action Framework and Transportation System Plan, to inform the creation of the Preferred Alternative, proposed Comprehensive Plan, and preferred Zoning Code. The Transportation and Climate chapters in the proposed Comprehensive Plan, which can be found on the Comprehensive Plan page of the City's website, includes goals and policies to support reductions in vehicle miles traveled, reductions in greenhouse gases, and improvements in options to walk, bike, roll, or take transit.
290	"I want to comment on Housing Density and Park Space. I live in current R6 zone in NW neighborhood. All proposed alternates will greatly densify this older neighborhood. Many of the streets are currently sub-standard, have limited	Comment Noted. Refer to Common Response #4: Vehicle Traffic Impacts, Common Response #5: Traffic Safety, Common Response #7: Sidewalks, Common Response #12: Neighborhood Character, and Common Response #11 Property Value and Taxes for more information on these topics.

ID	Full comment	Response
	width, no sidewalks and are not built to handle the proposed higher traffic volumes associated with this higher density. Our NW neighborhood is filled with many older homes and larger lots. Allowing this type of density in these types of older neighborhoods will greatly degrade the livability for the residents and will likely result in a decreased property value. It will also mean incentivizing developers and builders to remove trees and green space that currently helps mitigate heat, greenhouse gases and storm water runoff. I support the "No Action Plan" choice and ask that these above concerns be addressed when approving current lots to be densified. I also ask that as much park space, green space, and open space be protected as possible. With our two school districts in the city, and our parks areas, planting trees and more local habitat friendly plantings helps with the green spaces we have and are not currently benefiting our community as well as they could. With the changes in growth and climate keeping livability a key issue is very important on many levels."	Refer to the Plants and Animals sections of Final EIS Chapter 4 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts.
291	"I want to comment on Housing Density and Park Space. I live in current R6 zone in NW neighborhood. All proposed alternates will greatly densify this older neighborhood. Many of the streets are currently sub-standard, have limited width, no sidewalks and are not built to handle the proposed higher traffic volumes associated with this higher density. Our NW neighborhood is filled with many older homes and larger lots. Allowing this type of density in these types of older neighborhoods will greatly degrade the livability for the residents and will likely result in a decreased property value. It will also mean incentivizing developers and builders to remove trees and green space that currently helps mitigate heat, greenhouse gases and storm water runoff. I support the "No Action Plan" choice and ask that these above concerns be addressed when approving current lots to be densified. I also ask that as much park space, green space, and open space be protected as possible. With our two school districts in the city, and our parks areas, planting trees and more local habitat friendly plantings helps with the green spaces we have and are not currently benefiting our community as well as they could. With the changes in growth and climate keeping livability a key issue is very important on many levels."	Please refer to the response to Comment 290.
292	I think Alternative 2 is best for our city moving forward. Having more concentrated density allows for more efficient land use, more efficient transportation patterns (shorter trip lengths, more feasible high-frequency transit service, etc), and therefore less negative impact on the environment. It also creates more housing capacity which is desperately needed as we are in the midst of a housing crisis. One important unavoidable negative externality of any option that allows for less housing is an increase in unhoused people, because the more housing (even market-rate) that is built, through filtering, the more housing becomes available at the most affordable end of the spectrum. If we want to address GHG emissions and the housing crisis, as well as providing people more choices in what type of housing to live in and how to get around, I believe Alternative 2 is the most efficient and effective way of doing that.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
293	"Dear Bryan and Team: On behalf of our client DG Holsinger, LLC we would like to request a site specific request to change the Comprehensive Plan and Zoning designation on Parcel Nos. [parcel number] and [parcel number] to go from Industrial with Zoning OCI to Commercial. After reviewing the maps, we believe s that Alternatives 1 and 2 show this change. These parcels have a long and storied history as it was first approved by Clark County as the first horizontal mixed use project in the County and the development is currently built out including these parcels. The City subsequently annexed the property. We know that the City knows some of the history with this site. One of the challenges though is that the uses allowed in the OCI zone limit the ability to get tenants that are more conducive to the space as the surrounding built environment has developed. Furthermore, it may be better from a revenue standpoint to the City to allow uses that generate sales tax revenue.	Comment noted. The Preferred Alternative would zone these parcels as Mixed Use Neighborhood.

ID	Full comment	Response
	We look forward to providing the City more detail as the process develops, but wanted to make sure that this comment is included in the record. We appreciate the consideration of this site specific request. Best, Jamie"	
294	"Hello I live at [address]. This address is zoned light industrial, along with the residences on my side of this street. Across the street, all the houses are zoned residential. As I have just under 1 acre of property, I've contacted several agencies regarding building an ADU or allowing folks to live in tiny homes on my property. I have been told no and further that there is little chance of my ever being allowed to do this. My house is down the street from Fruit Valley Elementary School and Fruit Valley Park. In this area there is private and public housing, a mobile home park, apartments and single family homes. About a mile down the street from me you can get to Shillapoo WThis is one of the people densest and POOREST areas of Vancouver. I would like to ask that rezoning be considered for my address at [address] so that I can help to make more housing options available for Vancouver residents. If the city is sincere in in its efforts to create more housing opportunities for Vancouver, and also assist those with lesser resources, I would encourage looking into options like these rather than continue to encourage rampant industrial and business growth in the area. Current industry in the area already creates noise, pollution and traffic throughout the day and night."	Comment noted. The Preferred Alternative would zone this parcel as Low Scale Neighborhood.
295	"I'm excited about the upzoning across Vancouver, but for this plan to succeed, we MUST address car ownership and usage in the Hough neighborhood and Uptown specifically. If we don't take action now, more residents will bring more cars, which—combined with the already heavy cut-through traffic—will make it difficult, if not impossible, to walk, bike, or enjoy the area peacefully. The noise, pollution, and congestion will ruin the very quality of life we're trying to improve. I strongly urge you to include road diets for Mill Plain, Fourth Plain, Kauffman, Lincoln, Franklin, and Columbia in this plan! We need to reduce car dependence and promote micro-mobility if we want to add more housing while actually improving the neighborhood. Additionally, let's use this upzoning as a chance to force the property at Kauffman and Fourth Plain to be sold to someone who will do something useful with the space. This is a prime location, and it's frustrating to see an empty, rundown parking lot sitting in the heart of the neighborhood. Imagine what that space could become—a food truck park, a venue, a grocery store, apartments —anything other than the useless space it is now! Otherwise, the plan is a great step forward for Vancouver's bright future! Thank you!"	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. See also Common Response #4: Vehicle Traffic Impacts for more information. The Preferred Alternative zones the property on the NE corner of Kauffman Ave and Fourth Plain as Mixed Use.
296	I would like the Southcliff neighborhood to remain intact as single family homes. The city should preserve this unique neighborhood which was originally built with brick and sidewalk pathways between the homes creating access to their neighbors and formed a real community. I grew up in Southcliff, moved away for school and work and now have retired in the Braewood neighborhood. It really makes no sense to allow homes to be converted into businesses or multilevel housing along Mill Plain. If planning for the Tower Mall area is done well, there should be no need to encroach on a thriving established neighborhood. Instead we should protect these areas which make Vancouver a livable and desirable city.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
297	"Hello I live at [address]. This address is zoned light industrial, along with the residences on my side of this street. Across the street, all the houses are zoned residential. As I have just under 1 acre of property, I've contacted several agencies regarding building an ADU or allowing folks to live in tiny homes on my property. I have been told no and further that there is little chance of my ever being allowed to do this.	Please refer to the comment response to comment 294.

ID	Full comment	Response
	My house is down the street from Fruit Valley Elementary School and Fruit Valley Park. In this area there is private and public housing, a mobile home park, apartments and single family homes. About a mile down the street from me you can get to Shillapoo WThis is one of the people densest and POOREST areas of Vancouver. I would like to ask that rezoning be considered for my address at [address]. so that I can help to make more housing options available for Vancouver residents. If the city is sincere in in its efforts to create more housing opportunities for Vancouver, and also assist those with lesser resources, I would encourage looking into options like these rather than continue to encourage rampant industrial and business growth in the area. Current industry in the area already creates noise, pollution and traffic throughout the day and night."	
298	"The proposed changes to the zoning of the South Cliff neighborhood are very draconian. With only 111 homes in our neighborhood, the proposed changes have an outsized effect. Is there any other neighborhood with as great as percentage change proposed? This should certainly be part of the criteria when proposing change. An analysis of all neighborhoods of proposed percentage change would show the unfair burden being placed on South Cliff. In addition, we already have massive change in the very near future with the Town Plaza Regional Activity Center. Fair play would require that the city wait until the new development is complete and any issues addressed before imposing more change. Mill Plain/Fourth Plain/Grand/Evergreen have quite a bit of commercial property that is underdeveloped/used. Shouldn't the first step be to incentivize the redevelopment of current commercial property before adding more? If all of the underutilized commercial property along our major arterials were identified, and redeveloped, isn't this a better solution? Infrastructure is already in place. Our historic neighborhood will lose its unique characteristics. Greater car density on heavy walked/biked streets will decrease safety. And to reiterate my first point, the residents of South Cliff will have a disproportionate burden compared with other neighborhoods. I am firmly opposed to both alternatives."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
299	"PARKS: I would like to see an increase in parks in both Alternative 1 and 2. For example, in east Vancouver, Burnt Bridge Creek School Park (currently zoned as a park) is listed as a mixed use neighborhood (Alt 1) or medium scale neighborhood (Alt 2). Especially in areas that have old trees (like Burnt Bridge Creek School Park), I would like to see those areas preserved as parks. Because of the potential for higher grown in Alternative 2, I prefer Alternative 1 since it allows for the possibility that some of the land under proposed development could be kept as parks / greenspace. AESTHETICS / HOUSING: To preserve the character of existing neighborhoods, I would propose that there should be transition areas to go to the parts of the city with denser housing. However, this does not appear to be the case under Alt 2 in my neighborhood, where there is a proposed mixed use neighborhood (red) within a low scale neighborhood (proposed for along NE 162nd Ave between NE 4th Way and NE 48th Cir). This would significantly change the aesthetics of this neighborhood and increase traffic and noise (which is already significant because of increased traffic on 162nd). Instead, I would propose that there are mixed use / higher density housing be sited in areas that can transition to this, rather than going from low density to high density without a ""transition zone.""""	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative would include a similar amount of land zoned for parks and natural areas as compared to Alternatives 1 and 2. Refer to Common Response # 12 Neighborhood Character and Common Response #4 Vehicle Traffic Impacts for more information on those topics.
300	"Comments from Maureena Cravens, [address], re ""proposed zoning changes"" Sept 8, 2005 We bought our Southcliff home in early 1970's – A perfect historical neighborhood to raise a family. Quiet, Little crime, Well-cared-for homes & yards Years pass – Southcliff exceeded our expectations As our family grew, we enjoyed Overnight stays in the tree house for the young In hammocks in the tall trees for the adults	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Badminton & croquet games in the street-side yards No fears: Our children started a newspaper recycling business long before curbside We drove them from house to house, to neighbors who were interested in The environment Helping children learn responsibility Caring about helping others Making children feel welcomed & respected (after years many still ask about our adult children) The city is proposing a change where our home will be situated Across from a streetmall where people are more interested in shopping than the environment Near apartments where no on-site parking would be available Where much street parking could cause environment problems from car drainage Where our grandchildren could no longer walk without watching for heavy traffic If the only ingress to our area is from Umatilla Way, does that mean? Our driveway will be used for turning Parking will be difficult to find & other parts of the neighborhood will suffer also No longer will our home be a safe place for our family & later great-grand-children What are our options? Privacy fencing with the hope that no unwanted person will come into our yard Increased security that will help us be aware of wrongful activities in our yard; Or to move -- might be the preferred option - even knowing that home values will plummet To leave our home of more than 50 years To see the neighborhood we have enjoyed change beyond belief To know the neighbors we leave will have to deal with many complications to their life-style Walks in streets that are filled with cars – parked & moving Increased noise from more human presence Complete change from a beautiful community with houses on larger plots of land A community that was developed after WW2 and serves as a physical reminder of that event What are their options?"	
301	I do not support changing our neighborhood to include multiple housing on the existing single family lots. This change does not align with other housing and will increase through traffic and road safety. Any additional housing density gained would be minimal while the damage to our neighborhood would be significant. It would reduce our housing value.	Comment noted. Refer to Common Response #2: General Growth and Quality of Life Concerns, Common Response #4: Vehicle Traffic Impacts, Common Response #5: Traffic Safety, Common Response #11: Property Value and Taxes, and Common Response #12: Neighborhood Character.

ID	Full comment	Response
302	Hudson's Bay should not be rezoned as mixed-use under Alternative 2. Allowing 110-foot housing would cast shadows, displace existing homes/homeowners, and encourage developers to demolish homes in favor of dense housing that prioritizes developer profit over livability and neighborhood character. This is one of the last areas of affordable single-family homes for first-time buyers, and increasing density at this scale would erode affordability, devalue current properties, and disrupt the small-lot, historic fabric of the community. Alternative 1 is far better suited for Hudson's Bay, or Alternative 2 should be modified to protect this neighborhood's identity and quality of life.	Comment noted. The Preferred Alternative would zone Hudsons Bay as a mix of Mixed Use Neighborhood and Medium Scale Neighborhood. Refer to the Aesthetics and Housing sections of Final EIS Chapter 3 for more information on the potential impacts to these topic areas, as well as proposed measures to address impacts. Refer to Common Response #8: Housing Affordability/Options, Common Response #9: Homeownership Opportunities and Common Response #12 Neighborhood Character.
303	"On Page 172-3 of the Draft EIS it states that: > Alternative 2 would encourage a walkable, compact, and mixed-use style of development in the most parts of the city compared to the No Action Alternative and Alternative 1. Therefore, Alternative 2 would be the most likely to shift vehicle trips to zero-emission modes, facilitate shorter vehicle trips, and support further reductions of air pollutant and GHG emissions. Because of this I encourage the city to adopt alternative #2. I would add that I live in the Southcliff neighborhood and frequently walk to the Safeway at Mill Plain & Andresen. However, because I avoid the most dangerous parts of Mill Plain this walk is 2.8mi round trip for me. I welcome the day that we have more facilities in Southcliff and it doesn't take me an hour to walk to the store and back. I also appreciate the manner in which Alternative 2 clusters higher density developments along our BRT lines. I think that every single BRT stop should be a hub for dense mixed use development, especially the stops at Brandt Rd and Devine Rd."	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
304	"Our names are Dave and Beth Christensen. We have lived in Southcliff since 1993. The proposed plans for our neighbor and adjacent areas are completely destructive to the 110ssence of our community. We are opposed to the proposed zoning changes. Southcliff is a historic mid-century modern neighborhood that must be reserved as is and not destroyed by the Cityjust to make room for people who might move here by 1945. We moved to Southcliff for the quiet streets and beautiful trees. Proposed changes would destroy the essence of our community. Tall buildings, excessive street parking will replace beautiful landscapes and beautiful generation homes. This is unacceptable. Look elsewhere in your Heights plan for increases in "density improvements."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
305	I appreciate the concern for the natural environment incorporated in the proposed plans; it's essential to preserve trees and green spaces, as well as water quality. For the long-term vision, I prefer Option #2, which, by taking a longer view, prevents a potential hodge-podge of expansion from occurring in a piecemeal manner, which I believe will ultimately cost everyone more.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
306	"I am writing to share a professional observations on the Comprehensive Plan Update and its Draft Environmental Impact Statement (DEIS), with a focus on LEED for Neighborhood Development (LEED-ND) alignment, transportation-noise exposure along SR-14/SR-500, vacant land and growth, and the City's goal to expand urban tree canopy. Executive summary Under a conservative plan-level evaluation, the Update as drafted would likely achieve ~50–52 LEED-ND points (Silver). With targeted code and overlay updates, the City can credibly reach Gold (60–79). That would keep the goal of implementation across the city as seen in the high returns of the Vancouver Waterfront Redevelopment building requirement of LEED Gold. The DEIS confirms persistent transportation noise exposure along SR-14/SR-500 (as well as I-5/I-205 and rail). A predictable, health-protective Noise Exposure Overlay will safeguard residents and reduce future retrofit costs. The City's land-capacity model (VBLM) points substantial new housing capacity toward areas that currently have below-average canopy, which risks widening environmental inequity unless urban forestry performance is made enforceable.	Comment noted. Many of the suggested actions are included in the Comprehensive Plan, Code or other City policy documents. Refer to the Noise section of Final EIS Chapter 3 and Plants and Animals section of Final EIS Chapter 4 for more information on the potential impacts to these topic areas, as well as proposed measures to address impacts.

ID	Full comment	Response
	If Vancouver aspires to double canopy from ~19–20% toward ~38–40% over time, the Comprehensive Plan should translate goals into clear standards, funding, and maintenance aligned with growth areas. I have attached a LEED-ND Plan scorecard, a one-page "Gold Pathway" with an implementation Gantt, and noise value-uplift tables that quantify near-term benefits for homes along major corridors when noise is reduced. Findings LEED-ND alignment (Plan level) Strengths: Centers & corridors strategy; compact, mixed-use growth; active transportation emphasis; open-space and stormwater protection; parcel-level land-capacity analysis. Gap to Gold: Many LEED-ND credits require binding standards (not just policy intent). The current draft doesn't yet codify performance thresholds for parking/TDM, green infrastructure volumes, green-building certification, tree-canopy delivery, or design requirements in noise-exposed areas. Estimated score today: ~50–52 points (Silver). Path to Gold: Adopt a short set of code-level levers (listed below) that convert plan language into measurable outcomes at entitlement. 2) Transportation noise — SR-14 / SR-500 Residential Neighborhoods The DEIS' noise mapping identifies high exposure near SR-14/SR-500 and other corridors. Allowing additional housing in these bands without predictable mitigation invites health, livability, and economic costs. Using standard "noise depreciation index" literature (home value change per 1 dB), reducing corridor noise yields tangible equity gains: -3 dB (half the sound energy) → roughly +0.9% to +3.0% in home value. -10 dB (half the perceived loudness) → roughly +3% to +10% in home value. At ~$510,000 median values, that's ~+$4.6k to +$51k per home, depending on the scenario and local conditions. In practical terms, working with DOT to study lowering speed of rail and road through a Noise Exposure Overlay that requires acoustical studies, façade STC/IIC minimums, and non-mechanical ventilation; so windows can be opened for cross ventilation for natural cooling. This a cost-effective, predictable approach that protects residents and ensures durable community support for infill and tax revenue. 3) Vacant land, capacity, and siting The plan's use of the Vacant Buildable Lands Model (VBLM) is a strong foundation. It allows Vancouver to prioritize infill parcels that deliver transit access and services while avoiding critical constraints exactly the siting discipline LEED-ND favors. 4) Urban forestry — closing the canopy gap (and doubling over time) Vancouver's measured canopy is ~19–20% (vs. the earlier goal of 28% by 2030). The DEIS shows most added housing capacity is in sub-average canopy tracts; absent enforceable standards, average canopy is likely to stagnate or decline. To double canopy long-term, the City needs enforceable planting, soil-volume, species, and maintenance requirements tied to development, plus a Canopy Fund to plant where on-site delivery is impractical. Recommendations "Gold Pathway" Adopt a Noise Exposure Overlay for housing, schools, and childcare in mapped high-exposure bands (SR-14/SR-500, I-5/I-205, rail). Require acoustical studies to lower speed limits, minimum façade STC/IIC, and mechanical ventilation; pair with targeted off-site abatement where feasible.	

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	Make canopy performance enforceable. Establish minimum on-site canopy or replacement ratios, street-tree spacing and soil-volume standards, maintenance bonds, and a Canopy Fund. Prioritize plantings on vacant parcels in low-canopy tracts identified by the VBLM. Rainwater Management & Green Streets. Set on-site retention volume targets (e.g., 85th-percentile storm) and adopt green-street cross-sections within centers and transit walksheds. Parking maximums + Transportation Demand Management (TDM). In centers and frequent-transit areas, require parking maximums, unbundling, shared-parking plans, and TDM for larger projects. Green-building thresholds with incentives. Require LEED/PHIUS/ENERGY STAR (or EUI performance) above floor-area triggers, with density bonuses and expedited review. TOD intensity & open-space connectivity. Set minimum heights/FAR within ¼–½ mile of frequent transit and require linear-park/greenway easements to stitch centers to parks. Requests to the Commission Incorporate the six recommendations above into the implementation package accompanying the Comprehensive Plan adoption (zoning text, overlays, and standards). Direct staff to publish a LEED-ND Crosswalk Appendix mapping each credit to specific code sections so applicants can demonstrate compliance at entitlement, not only at building permit. Prioritize capital for green-street retrofits and tree planting in low-canopy, high-growth tracts, and align that investment with the Noise Overlay deployment near SR-14/SR-500. Thank you for your thoughtful stewardship of Vancouver's growth as I hope to continue to call Vancouver my home in 2045. I am grateful to have been part of the Commission. Attachments (for the record) LEED-ND Plan Scorecard — credit-by-credit estimate with evidence and upgrade actions. Noise Value Uplift Scenarios — tables showing illustrative home-value benefits from noise reduction. LEED-ND review scorecard for the City of Vancouver Comp Plan/DEIS, a plan-level estimate (v4/v4.1 structure), scored on whether the plan + foreseeable code updates enable each credit. Where LEED requires binary compliance, I show our best integer estimate and a short path to lock it in at entitlement. Estimated total: ≈ 50 points (Silver) SLL: 14 / 28 NPD: 24 / 41 GIB: 12 / 31 With the six code moves we outlined (Noise Overlay, Canopy standards, Rainwater/Green Streets, Parking/TDM, Green-building thresholds, TOD/Open-space), the plan is on a realistic path to Gold (60–79). Smart Location & Linkage (SLL) — 14 / 28 Credit (LEED-ND Plan) Pts Avail Est. Pts Status Evidence/Notes Action to lock points Preferred Locations (infill, centers/corridors) 10 6 Likely Growth targeted to centers & corridors; parcel-level capacity (VBLM). Map preferred-location bonuses/conditions into zoning. Locations with Reduced Auto Dependence (transit/VMT) 7 4 Partial Transit emphasis and TSP; policy intent strong. Adopt access/headway metrics; require TDM for large sites. Housing & Jobs Proximity 3 1 Partial Land-capacity assigns housing/jobs by zoning & feasibility. Tie jobs–housing targets to entitlements in activity centers.	

ID	Full comment	Response
	Existing Infrastructure (in-city service areas) 1 1 Likely Infill on existing utilities. Require service-availability confirmation. Resource & Floodplain Protections (CAO/SMP) 7 2 Partial CAO/SMP updates referenced; buffers increased. Codify no-net-loss, mitigation banking; publish maps. Brownfield Redevelopment 2 0 Gap Cleanup incentives not specified. Create brownfield inventory + incentives in subareas. Subtotal SLL 28 14 Neighborhood Pattern & Design (NPD) — 24 / 41 Credit (LEED-ND Plan) Pts Avail Est. Pts Status Evidence/Notes Action to lock points Walkable Streets (frontage, block metrics, active ground floors) 9 4 Partial Centers/corridors call for walkability. Add block-length/frontage standards; limit curb cuts. Compact Development (min density/FAR) 6 4 Likely Higher intensities in centers & corridors. Set minimums in transit walksheds. Mixed-Use Neighborhoods 4 3 Likely Centers mix housing, employment, culture. Map non-residential frontage minimums in cores. Diverse Housing / Affordability 7 3 Partial HB 1110 enablement; affordability tools TBD. Adopt inclusionary/bonus-based affordability in centers. Connected & Open Community (network/connectivity) 2 1 Partial Connectivity implied; standards not explicit. Require connectivity indices or max block perimeters. Public Space / Parks Access 2 2 Likely Open-space network preserved/expanded. Codify access distance & open-space ratios. Food Production / Urban Agriculture 1 1 Likely Urban ag/pollinator policies present. By-right community gardens; incentives. Bicycle Facilities (network + parking) 1 1 Partial→Likely TSP references; standards can be codified. Require secure bike parking & end-of-trip in centers. Transit Access / Facilities / TOD Enhancements 2 2 Partial→Likely Transit corridors strategy. Require shelters/real-time info; curb 113gmt.; TOD min heights/FAR. Tree-Lined Streets / Heat-Island 1 1 Partial→Likely UFMP + canopy goal; ~20% baseline. Street-tree spacing & soil-volume standards; maintenance bonds. Existing Grid / Small Blocks (legacy areas) 1 1 Likely West side grid supports walkability. Extend grid/paths in large redevelopments. Parking Management (maximums/unbundling/shared) 2 1 Partial Strategy implied; not yet codified. Adopt maximums, unbundling, shared-parking plans. Civic & Public Space Design Quality 1 1 Partial→Likely Centers invest in public realm. Adopt public-space frontage/amenity standards. Subtotal NPD 41 24 Green Infrastructure & Buildings (GIB) — 12 / 31 Credit (LEED-ND Plan) Pts Avail Est. Pts Status Evidence/Notes Action to lock points	

ID	Full comment	Response
	Certified Green Buildings (LEED/PHIUS/ENERGY STAR) 5 1 Partial No citywide requirement yet. Size-based thresholds + density bonus/expedited review. Building Energy Performance (EUI/Stretch) 2 0 Gap Not cited. Adopt EUI caps or performance code overlay. Indoor Water Use (WaterSense) 1 0 Gap Not cited. Require WaterSense fixtures citywide. Rainwater Management / Green Infrastructure 4 3 Partial→Likely Stormwater regs & GI prioritization. On-site retention targets; green-street cross-sections. Heat-Island Reduction (roof & non-roof) 2 1 Partial Canopy/heat language; no albedo reqs. Require cool roofs/pavements or shade coverage. Renewable Energy / Solar Orientation 3 0 Gap Not cited. Solar-ready, PV incentives; streamlined permitting. Light Pollution Reduction 1 0 Gap Not cited. Adopt BUG ratings & lighting zones. Solid Waste / Recycling (space & diversion) 1 0 Gap Not cited. Require recycling/organics rooms in site plans. Green Infrastructure Network / Habitat 2 1 Partial Biodiversity corridors/CAO buffers. Map continuous green network; no-net-loss. Long-Term Maintenance & Management 2 1 Partial Urban Forestry Mgmt Plan (2023). Maintenance bonds; post-occupancy verification. Green Streets / ROW Canopy Standards 2 1 Partial UFMP supports expansion. Street-tree specs + soil volume per tree. Construction Activity Pollution Prevention 1 1 Likely SWPPP via stormwater code. Reference code in entitlement conditions. Subtotal GIB 31 12 Noise overlay & equity note DEIS maps elevated transportation noise near SR-14 / SR-500 (and I-5/I-205, rail). Requiring a Noise Exposure Overlay (site acoustics, minimum façade STC/IIC, and mechanical ventilation) lets you pursue compact, transit-served infill without sacrificing livability; it also protects home values along corridors (illustrative uplift ~1%/dB, e.g., −3 dB → +0.9–3.0%, −10 dB → +3–10%). Most added housing capacity sits in below-average canopy tracts; converting canopy goals into enforceable standards (planting/replacement ratios, soil volumes, maintenance bonds, and a Canopy Fund) unlocks NPD/GIB credits while closing heat and equity gaps.”	
307	“My name is Chen Yu Xu. I live with my 2 year old daughter and husband at [address] in the Southcliff neighborhood. I am against the zoning changes to my neighborhood in both Alternative 1 and Alternative 2. I have been walking my daughter to Southcliff park everyday, rain or shine, since she was 2 months old. Before she sat in her stroller, but in the past few weeks she has been riding her tricycle to the park. I’m excited to think that in a few years she will be riding her bike there all on her own! But that won’t be possible under Alternative 1 or Alternative 2. To get to the park we go along Oregon Drive, which is now a quiet street with ranch houses and few cars. If those are replaced with buildings up to 5, and even 8, stories tall and the heavy traffic from those buildings, it won’t be safe for my daughter to ride her bike there, or even walk on her own. I know it’s not just residents of Southcliff who enjoy our park and walking and riding through our quiet neighborhood streets. I have become friends with many other parents at the park with young kids who come from different areas of	Comment noted. Refer to Common Response #14 for the City’s response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	the city. They complain their streets aren't safe for their kids to play because of the traffic and parking at nearby businesses. If that happens to Southcliff, where would my daughter and the little friends she has made at the park ride their bikes and play?"	
308	"My name is Ryan Grimm. I live in the Southcliff neighborhood at [address]. I strongly oppose the zoning changes to Southcliff in Alternative 1 and Alternative 2 of the Draft EIS. As background, my family relocated to Washington state from Asia in 2021. Working remotely, we had many potential communities in the state to choose from. We chose Vancouver over Camas and many others primarily because the Southcliff neighborhood offered a unique combination of nature, with its beautiful, mature trees; quiet, safe streets for our kids to play in; and close proximity to many urban attractions, all just a short car, bus or bike ride away. Learning about the Southcliff restrictive covenants and the Tower Plaza redevelopment area reassured us our neighborhood would maintain its special character while the city could continue to grow and thrive around us. That would all be threatened if the development encouraged in Alternatives 1 or 2 took place. Many of the mature trees we love in the neighborhood would have to be cut down to build apartment or commercial buildings along Oregon Drive. My wife and I both cried when we lost a 75-foot spruce tree in our yard during a 2022 winter storm. We replanted with a ponderosa pine and a giant sequioa, but such large evergreens (which Vancouver is rightly famous for) couldn't be planted among the dense new development contemplated in Alternatives 1 and 2. The quiet streets my daughter rides her tricycle through would be overwhelmed with hundreds of cars from the new development. Because there are no sidewalks in the neighborhood, it would no longer be safe for her to ride to the Southcliff park. The Tower Plaza redevelopment area already contemplates significant new residential and commercial construction, including much needed affordable housing. My family welcomes that redevelopment and is prepared to share the burden of the dramatically increased traffic congestion and pollution it will bring to Southcliff and other surrounding neighborhoods. If further development is required in our immediate vicinity, please concentrate it in Tower Plaza, which currently contemplates even lower building heights than Alternative 2 would allow in Southcliff."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
309	"I like the higher density of Alternative 2 and the increased Regional Centers, but I don't think a "one size fits all" solution should be applied to all neighborhoods equally along the transit lines. I live in the Southcliff neighborhood and feel we may get a double whammy of noise and congestion with both high density planned along the north side of MillPlain and the Heights District Development being implemented at the same time."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
310	"After review of your Comprehensive Plan for 2045 Draft Environmental Impact Statement, the great influence of UN Agenda 2030, World Economic Forcum and leftist Diversity, Equity and Inclusion precepts have on your Vancouver 2045 plan is readily apparent. These influences are fundamentally un-American and anti-human, intended to implement control schemes over humanity to extract and funnel yet more power, money and control upward from the masses into the hands of the so-called elites of our world, the masterminds who think they know best how the rest of humanity should live. It's sad, but apparently these masterminds exist at all levels, global, national, state and local, as evidenced in your current operations and 2045 plan, with centralized, collectivist, top-down mandated schemes for utopian dreams. Ascribing the driving force to reduce the human footprint on "mother earth" to our putative overlords in Olympia, you justify the heavy-handed, downward-directed planning with the usual totalitarian excuse, "we were just following orders." But it's clear you are part and parcel of this effort to constrain your citizens, and are hostile to their reasonable concerns. You steamroll right over the citizens of the city and their concerns and do what your darn well please to implement your utopian plans.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.

ID	Full comment	Response
	Repeated instances of unwanted, unasked for top-down initiatives from the city reveal your true colors, like in creating the Vine network with bus stops in traffic lanes, not off to the side, a vine that is choking the flow of personal vehicles of conveyance as well as creating safety hazards, especially at stops near major intersections. Or consider your plans to destroy established neighborhoods and drive residents out of their single-family homes in order to create high-density mixed used rabbit hutches along both sides of Mill Plan west of the Tower Mall project. Or your demolition of habitability around the city, approving any and every bid to build row houses or apartment complexes in neighborhoods with no apparent concern for saturation of infrastructure and environmental impact on the existing community. Even the urban flora and fauna are suffering from your reckless concentrations of concrete. Or consider your ongoing campaign to narrow public streets for personal operated vehicle access on East Fourth Plain Blvd, on Fort Vancouver Way, on SE 34th Street and your latest target, SE McGillivray Blvd. These last two roads are perhaps the most ludicrous impositions, and oxymoronic given the recent expansion of the number of lanes on State Highway 14 between SE 164th Avenue and I-205 into which these streets feed and receive traffic. That you base these plans for increasing concentration of humanity on requirements to accommodate projected population growth in Vancouver makes it questionable as well. I believe these various estimates of population growth are fallacious because they require an undesired, unnecessary, sustained level of immigration to attain. And you seem to make no difference between legal and illegal in your calculations, even as the present administration is significantly reducing the number of illegal aliens in this country. Without increased population numbers, your plan is inappropriate and not required. In short, your leftist, globalist, totalitarian values are not welcome here in Vancouver, USA. We don't want to lose the quality of life we enjoy to become a bunch of high-density lab rats penned up in 15-minute cell blocks, exploited by the "you will own nothing and like it" attitude of masterminds, denied the freedom of movement that is our birthright and heritage in these United States. Your 2045 plan should be utterly, completely rejected. As should be the politicians and bureaucrats who came up with this drivel."	
311	"I am writing to voice my concerns and strong opposition to the proposed re-zoning of Vancouver's Southcliff neighborhood that is included in "Alternative 1" and "Alternative 2" of the Draft EIS Statement for Vancouver's Comprehensive Plan 2045. I have been a resident of the Southcliff neighborhood for over 9 years, and the proposed re-zoning of the neighborhood would negatively impact Southcliff, its residents, and the city of Vancouver. My husband and I chose to live in Southcliff primarily because it is an established neighborhood with historical significance and because we appreciated its current, established planning that allows for low congestion, public safety, and quiet. Re-zoning Southcliff to allow for Low-Scale, Medium-Scale and/or Mixed-Use development anywhere in the neighborhood would destroy the neighborhood's character and contradict the established restrictive covenants that have been in effect in the area since the 1950s. As early as the 1950s, restrictive covenants for this neighborhood limited development to single-family, residential homes and limited building heights to a maximum of two stories. These covenants are still in effect and have been reinforced by Southcliff's 2001 Neighborhood Action plan. Any Low-Scale, Medium-Scale and/or Mixed-Use development would directly contradict this long-established neighborhood planning guidance. The proposed re-zoning would also have a direct negative impact on my family. As the mother of a small toddler who is just learning to walk, I want to raise my child in a neighborhood where it is safe for her to play outside as she grows and where she can see greenery during our neighborhood walks. If the lots abutting Mill Plain are re-zoned to Mixed-Use, my child and I would be looking at concrete, businesses, and parking lots during our neighborhood walks instead of trees, squirrels, and flowers. The increased congestion (whether due to cars, bicycles, motorcyles/mopeds, or pedestrians) within the neighborhood as well as at neighborhood entry points would create safety concerns that would limit my child's ability to play outside in her own neighborhood, and it would also increase noise pollution and potentially increase exposure to vehicle emissions that could negatively impact my child's growth and development. Additionally, having 4-,6-, or 8-story apartment buildings overlooking our house and yard would shatter our family's privacy. My husband and I love our current home and would like to raise our child here, but I fear that such changes would likely result in our family leaving Southcliff. I understand the City's need to plan for future growth, but instead of re-zoning parts of Southcliff (a relatively small neighborhood) for Low-Scale, Medium-Scale, and/or Mixed-Use development, I would urge the City instead to	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	consider concentrating commercial development and providing opportunities for more multi-family housing developments in the portion of the Mill Plain corridor just West of I-205. While that stretch of Mill Plain is already commercial, it is considerably under-developed, with a number of single family homes and/or trailers that have been converted to businesses. The density of commercial businesses in this area could be markedly increased. Also, a number of the commercial properties in that vicinity are currently in disrepair and/or house businesses that are not family-friendly (e.g. massage parlor, vape shop); currently, I do not feel safe visiting commercial businesses on that stretch of Mill Plain (either when alone or when my child is with me), and redevelopment of this area could potentially attract new residents and jobs to the area, supporting further growth of the City without making existing residents feel the need to leave. Thank you for considering my comments."	
312	"SE 146th Ave. Can we get a speed monitor, speed-activated flash camera, signs and/or a speed bump, and a little road work starting at the roller-coaster-asphalt at the top corner of SE 146th Ave and 20th? Instead of $$$$$pending a bunch of dough on your controversial plans for McGillivray, could you please just fix the crumbling neighborhood roads first?"	Comment noted. This comment is outside of the scope of the EIS.
313	"RE: Parcel [parcel number] ""SRHV, LLC"" Please consider rezoning to R50 as conceptually presented in (Draft) Pre-App correspondence with Jordan Ramis representatives in late 2022 into 2023. Rezoning to R50 harmonizes the surrounding variably zoned parcels, fosters retention of the existing grove of Oregon White Oaks, and catalyzes the City of Vancouver's "Rezone" ambitions to improve urban housing affordability while reducing environmental footprint via greater residential density near major arterials and bus routes."	Comment noted. The Preferred Alternative would zone this parcel as Heavy Industrial, maintaining the zone from current zoning.
314	I would like to see more parks and not taking over any existing parks for housing . In particular the Burnt Bridge Park should be left alone. Many people including myself use this park as is close to my neighborhood. You should not zone the corridor along 162nd Avenue where housing is present now to mixed as that would bring noise and take away from the the remaining neighborhood that has been established for years. I understand that you need more housing within the city limits but there should be consideration given to the surrounding neighborhood that is existing around that development and how a dense population would effect those single dwellings that have larger lots. There should be a compromise between lots that ae 2,000 square feet when it is presently zoned R9. I am speaking in particular the 7.3 acre property off NE 34th street and NE 152nd avenue with the 4 radio towers that is developed by Ginn Corp. There has goo to be a solution to affecting the existing neighborhoods so adversely.	Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
315	"Concerns for Market Feasibility for Southcliff Neighborhood – 9/8/2025 This filing addresses the issue of commercial feasibility of high-density housing rezoning in the historical Southcliff neighborhood. Also please refer to my filing of 8/28/2025, final paragraph on Page 2 and the last paragraph on Page 3 of Attachment 2. I am more convinced that the unique characteristics, from scientific, economic and financial standpoints, when accurately included in the City's EIS alternative rezoning models, will demonstrate that all of the City's current rezoning pro-forma model outcomes for the demand prototypes (City and State) for all three rezoning designations will indicate a very low probability of competitive commercial development. This conclusion is based primarily on the unique scientific and historical characteristics of the Southcliff neighborhood (refer to my 8/27 and 8/28 filings) . Furthermore, inclusion of such characteristics would preclude the use of city "averages over a substantial range" of proforma model inputs to estimate commercial feasibility of such rezoning. Of the three current outcomes, two would require free land (RLV) and taxpayer subsidy when using this "city average" methodology (see Attachment 2 ECOnorthwest). No information is available in the Attachment 2 for the range of any positive outcomes for land value of these 111 Southcliff lots. Model inputs can be manipulated to either increase revenue and/or decrease costs, in order to generate positive Development Value and Land Budget and derived Residual Land Value.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	I again request all relevant data used by ECOnorthwest or other City consultant(s) for the EIS regarding the analyses of the potential probability for competitive commercial development of rezoning for high-density housing in our neighborhood. My interpretation of the Attachment 2 strongly indicates that even using "average city" inputs (not the Southcliff Neighborhood unique characteristics) for higher density housing, such development of the this neighborhood would lack both the demand scale and the income/cost repeatability to sustain long-term (10 years or greater) economics needed to support the threshold financing (return of competitive debt and equity at market capitalization rates) and would increase the economic risk for institutional investors who are the likely investors for such high density affordable housing. Such risk would likely divert their funds to more competitive projects. I would suggest that the City consider the transfer of any such higher density rezoning, including the State's Low-Density, wrongly mandated for this neighborhood, to alternative regional developments where both economic scale and long-term income/cost repeatability would be more sustainable than at Southcliff. Such a transfer would greatly benefit the City's effort with the State's Low Density housing objectives with the least environmental impact mitigation costs (not fully offset by planned mitigation measures to other regional environments) with the least investment of taxpayer revenues related to this planned rezoning of the Southcliff neighborhood. Conclusions Southcliff neighborhood's specific capital and operating costs into the City's model equations to determine competitive Commercial Development feasibility would include: 1. Environmental remediation (e.g. tree canopy and bird habitats, others) 2. Surface and groundwater restoration and related soil stabilization (e.g. for upriver remediation of Columbia River salmon habitat. 3. Geologic hazards and related seismic instability (e.g. multi-story seismic design) 4. Historical preservation of unique Southcliff neighborhood 5. Ingress and egress vehicular and pedestrian safety 6. Any subsidies from taxpayers These costs would certainly reduce rezoning development income generation and would reduce Land Budget Value (RLV) likely below the positive value needed for competitive financing feasibility, unless land is free and taxpayer-based subsidies are provided based on criteria used on Attachment 2."	
316	*Incomplete form, no comment received*	*N/A*
317	I live in South Cliff and I prefer Alternative 2 because I favor high density mixed use development.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
318	Request reconsideration of the proposed zoning change.	Comment noted.
319	"City of Vancouver Planning Department [address] Vancouver WA 98660 Subject: I am the co-owner of parcel [parcel number], Kondor Express. Dear Planning Department I would like to ask that you reconsider the proposed rezoning to Regional Activity Center (RAC). We have been actively marketing this property for two years, and even under the current mixed zoning, buyer interest has been	Comment noted. The Preferred Alternative would zone this parcel as Medium Scale Neighborhood.

ID	Full comment	Response
	limited. The proposed RAC designation, given the high-density, high-rise requirements, would further reduce the site's viability. In addition, the property faces significant development challenges: The extensive wetland area significantly limits usable floor space, and the unfavorable soil conditions make high-rise construction prohibitively expensive. In addition, the site is located away from a major road and currently has limited or no adequate access. Given these constraints, we believe that zoning to R-22 or R-18, or maximum R-33, would better reflect the physical realities of the site and its market potential. We thank you for your time and attention hope for your objective understanding. Sincerely. Ivan Yanyk [phone number] [email address]"	
320	I think it's very important that we consider the climate impacts of all of the alternatives, and I appreciate the callout that Alternative 2 would be most likely to support further reductions of air pollutant and GHG emissions, as well as shifting vehicle trips to zero-emission modes. I think that is an important point that we should be more strongly emphasizing. I find it disappointing that in the executive summary, it calls out that overall emissions are higher for Alternative 2 than Alternative 1, but there is no mention of that potential for further reductions or of per-capita emissions. While the actual DEIS goes into more depth and explains the nuance, I believe too much of the nuance is lost in the executive summary. I also think that it is important to try to estimate, or at least provide a comparison, for per-capita or per-household GHG emissions for each of the alternatives. I believe that any reduction is housing capacity in Vancouver will likely lead to potential residents locating instead in less-dense areas surrounding the city, and that will likely lead to more emissions and more VMT than if they were able to live in Vancouver itself - I would love to see this kind of analysis included.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS.
321	As a resident of Hudson's Bay neighborhood, I support Alternative 1. Opening up essentially the entire neighborhood to mixed-use would negatively impact the existing homeowners of the area in regards to noise, aesthetics and sense of community. I understand smart development of the Evergreen corridor to add more housing, however, the shear size of the multi-use district proposed in alternative 2 would completely destroy the quality of life for those who own homes in this area. With that said, it is my great fear that development in Hudson's Bay will not be regulated enough by the City to maintain the quality of life this area provides (walkability, safety, less traffic, quiet). I believe these qualities can be maintained during development, but at great care of the City to set limits on things like business working hours, setbacks, parking, clear noise restrictions, and so on. Please keep the multi-use development to areas on Grand, Evergreen or Mill Plain that do not directly impact the residents who have invested so much into this neighborhood.	Comment noted. The Preferred Alternative would zone Hudsons Bay as a mix of Mixed Use Neighborhood and Medium Scale Neighborhood. Refer to the Aesthetics, Noise and Housing sections of Final EIS Chapter 3 for more information on the potential impacts to these topic areas, as well as proposed measures to address impacts. Refer to Common Response #6: Vehicle Parking, Common Response #8: Housing Affordability/Options, Common Response #9: Homeownership Opportunities and Common Response #12 Neighborhood Character.
322	"I am excited for the upzoning but in order for this plan to be successful we need to discourage car ownership and usage in the Hough neighborhood. I worry that with more people living in the area, if nothing is done, more residential cars on top of the existing cut-through traffic will make it less pleasant to bike, walk, and live peacefully in the area without noisy cars polluting the air with smog and noise. I worry about my health living here with the constant car noise and pollution. Please make road diets on Mill Plain, Fourth Plain, Kauffman, Lincoln, Franklin, and Columbia part of this plan! We need to discourage driving and encourage micro mobility in order to add housing and make it a better place to live. Separately, we need to use this upzoning as an opportunity to force the owner of the property on Kauffman and Fourth Plain to sell to someone who will activate that land. It is a highly valuable parcel and it is incredibly unfortunate that we have a vacant ugly parking lot in the middle of an amazing place to be. How nice would it be to have a food truck park, venue, grocery story, anything other than that ramshackle building! Please also provide trees for urban shade, it is needed.	Comment noted. The Preferred Alternative would zone the property on the NE corner of Kauffman Ave and Fourth Plain as Mixed Use. Refer to Common Response #4: Vehicle Traffic Impacts. Refer to the Noise and Transportation sections of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases and Climate; and Plants and Animals sections of Final EIS Chapter 4 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts.

ID	Full comment	Response
	Other than that the plan looks FANTASTIC. Thanks so much – you've done an excellent job communicating this."	
323	DO NOT ALTER THE EIS PLAN FOR THE VILLAGE AT FISHER'S LANDING. ALREADY ONE CANNOT GET PROPERTIES LIKE OURS CLOSE IN WITH EASY ACCESS TO HIGHWAY 14 BECAUSE OF THE WAY THE CITY LIMITED LOT SIZES AND PLANS. PLEASE KEEP THESE HOUSES AS THEY ARE, CHANGING IT WILL MAKE THE NEIGHBORHOOD LESS SAFE, DECREASE PROPERTY VALUES, AND DISPLACE LONG TERM RESIDENTS OF THE VILLAGE AT FISHER'S LANDING AREA. IT WILL ALSO BE GOVERNMENT OVERREACH TO THE FULLEST. YOU CAN'T TAKE OUR FREEDOM AWAY TO ENJOY AND LIVE ON THE PROPERTY WE PURCHASED LONG AGO. THERE IS ALREADY TOO MUCH HIGH DENSITY HOUSING IN THIS AREA, AND YOU DIDN'T LISTEN TO RESIDENTS ABOUT TAKING TRAVEL LANES AWAY FROM SE 34TH ST, WHICH YOU DID ANYWAY.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
324	Leave the Land Use Map for the Village at Fisher's Landing the same. If you change the character of the neighborhood, you will only be making the neighborhood more unsafe, displacing long term residents, change and remove old growth trees and plants, and hurt property values. Vancouver needs more single family residences, especially since city annexation made the lots smaller and changed the character of the neighborhoods. The Village is just right as it is, and putting in more mixed use and higher density housing will only make the congestion on 164th worse due to the convergence of more people trying to get to the same access point to Hwy 14th. You already annexed the neighborhood from Camas, do not go further and ruin the character of the neighborhood.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
325	"My comments are regarding the potential rezoning options for The Village at Fishers Landing. As a resident of the neighborhood since 1991, I urge no change in the current zoning. I am concerned about the impact of traffic, congestion, and the impact of long-term residents losing the character of the neighborhood. But I have little confidence the Vancouver City Council will change direction based on the very frustrating experience when giving feedback about closing lanes on 34th Street. At every meeting I attended for that project, 100% of the feedback was vehemently against the proposal. But none of the feedback was considered, and the lanes were closed anyway. For this current proposal, if more development is desired near the Fishers Landing Transit Center, it should be done north and west of the transit center and/or along 39th Street. When I moved to The Village in 1991, 39th Street was open to 164th Avenue. 39th Street was easily accessible when exiting Highway 14 onto 164th Avenue. Reopening 39th Street would be a better option than rezoning The Village."	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.
326	"To Our Vancouver, I'm writing to you as a concerned citizen and resident of the area to be affected by the new rezoning happening in Vancouver. While I understand that Vancouver is in need of affordable housing - and rezoning plays an important role in that - there are many aspects of rezoning that will impart long-term damage on our city. My partner and I bought a house in the Central Park neighborhood last year and a major factor in why we purchased a home in Central Park is the location. Downtown Vancouver has a historic charm that is now at risk due to rezoning requirements. In our neighborhood, we have a lot of long-time residents and seniors who have lived here for decades. This new redistricting policy opens up the possibility for old, well-built homes and properties to be destroyed and redeveloped - completely changing the landscape of one of Vancouver's historic neighborhoods. I think it's important to note that once these buildings are torn down and redeveloped, there is no bringing them back. The motto of our Central Park neighborhood association is "open space, a heritage worth preserving." Vancouver has a heritage worth preserving - and it resides in the historic buildings and neighborhoods that surround downtown. The population of Vancouver will continue to grow. Rather than destroying older neighborhoods, I believe our city should invest in making Vancouver more accessible for different modes of transportation to make the amenities of downtown more available to a wider radius of the population, particularly to those who are not within walking distance to downtown Vancouver. There's plenty of space for mixed-use zones throughout Vancouver that could be used to solve our housing crisis; my fear is that the rezoning of the Central Park neighborhood and other surrounding	Comment noted. The Preferred Alternative would zone Central Park as a mix of Mixed Use Neighborhood and Medium Scale Neighborhood. Refer to the Aesthetics and Housing sections of Final EIS Chapter 3 for more information on the potential impacts to these topic areas, as well as proposed measures to address impacts. Refer to Common Response #8: Housing Affordability/Options and Common Response #12 Neighborhood Character.

ID	Full comment	Response
	historic neighborhoods would be a temporary solution for the larger issue. The density of population you're proposing in these neighborhoods makes up a fairly small portion of the total housing needed. With both Alternates 1 and 2, we are being rezoned as either mid-scale or mid-scale/mixed use. I would implore you to consider a low-scale designation for Central Park. This could completely reshape the neighborhood and eliminate that environment that brings people in to begin with. I can acknowledge that the higher density designation in our neighborhood may be necessary in the future, but preserving these homes and communities for as long as possible and opening up other alternatives in the meantime will allow the beauty of our city to shine. With the low-scale designation, it still allows for an increase in density with ADUs and smaller developments to be constructed. Another concern with Alternative 1 is the rezoning of the Mill Plain corridor between Fort Vancouver Way and E Reserve St. Historically, as part of Fort Vancouver, I again hesitate with a mixed use designation in this space. Green space is an important aspect of good city planning and fear eliminating this space will take away from the beauty of Vancouver I completely empathize with the position you are in and the need to accommodate our growing population. My hope is that we can maintain the charm and quaintness that makes Vancouver special and maintain, at least for the time being, some of these neighborhoods. Thank you."	
327	"I'd like to advocate for the use of Alternative 1 over Alternative 2 in the Central Park Neighborhood. Given its historic nature, it's my experience that many families in the area, myself included, would like to preserve the homes in the neighborhood. My biggest concern with Alternative 2 is the likelihood for gentrification that would push many families out due to increased prices and larger corporations buying land along Grand and Mill Plain. Thanks for your consideration and for allowing this opportunity for feedback!"	Comment noted. The Preferred Alternative would zone Central Park as a mix of Mixed Use Neighborhood and Medium Scale Neighborhood. Refer to the Aesthetics and Housing sections of Final EIS Chapter 3 for more information on the potential impacts to these topic areas, as well as proposed measures to address impacts. Refer to Common Response #8: Housing Affordability/Options and Common Response #12 Neighborhood Character.
328	"My name is John Evans and I live in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Taking one look at Millplain just east of my neighborhood"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
329	"Subject: Comment on Draft EIS & Zoning – Protect Southcliff's Scale, Access, and Safety Dear Planning Commission, City Council, and Staff, My name is Jaynel Gilmore, and I am a recent graduate first-time homeowner at [address], Vancouver, WA 98661. I bought my home last year from the original owner, Alan Leland, who raised his family here beginning in the 1960s. I am a single mom with three school-age children—boy/girl twins Andrew and Vivian, and my youngest, Stetson. After saving for eight years, through soaring housing prices and interest rates, I was finally able to purchase this home. It is my family's version of the American dream: a safe place where my kids can walk, play, and grow up in a community that feels like home. I fully recognize the City's responsibility to plan for significant growth through 2045. Vancouver must make space for new residents, housing, and jobs. However, the Draft EIS "Action Alternatives" would impose high-density, mixed-use, and medium-scale zoning at the very entrance of Southcliff—specifically along Mill Plain and inward toward Oregon Drive—directly across from my home. This would drastically and permanently alter both daily life for my family and the historic character of our neighborhood. Specific Impacts to My Family and Home •Safety for children: My kids walk and bike on our quiet streets and play in the neighborhood park. With only three dead-end entrances and no new access from Mill Plain, funneling additional cars, delivery trucks, and rideshare traffic through these points would create dangerous conditions for children and pedestrians.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	•Privacy and livability: Allowing 3–8 story mixed-use buildings at the edge of Willamette Drive would overlook my home, remove privacy from our yard, and add noise, light, and congestion where quiet residential living has always existed. •Financial hardship: As a single parent, I put everything into my 20% down payment. I am stretched by my mortgage, property taxes, and raising my children with the rising cost of living, and tuition to nearby St Joseph Catholic School. Rezoning the SouthCliff neighborhood reduces home values or burdens us with parking and traffic problems risks undermining the fragile security I've worked years to achieve. •Environmental quality: Mature tree canopy and recent stormwater upgrades are vital to this neighborhood's health. Large new buildings, pavement, and runoff will undo those investments, harming air quality, shade, and water management. Conflict With Existing Guidance Southcliff's restrictive covenants (since 1954) and the 2001 Neighborhood Action Plan both protect its single-family character and two-story scale. Allowing taller, mixed-use development at our entries ignores decades of policy and community input. It also contradicts the City's own design for the Town Plaza/Heights area, where the greatest height and density are supposed to be focused. Constructive Alternatives I urge the City to: 1.Concentrate height and commercial activity in the Town Plaza Regional Activity Center, where infrastructure already supports it. 2.Prioritize redevelopment of existing commercial parcels along Mill Plain instead of rezoning Southcliff's residential blocks. Incentives like fee reductions and faster permit reviews could encourage developers to revitalize these areas. 3.Require traffic, parking, emergency access, and stormwater analyses specific to Southcliff before considering any rezoning. My Request Please select a Preferred Alternative that keeps Southcliff's residential blocks low-scale and removes the proposed mixed-use and medium-scale zoning at our entries on Mill Plain. Protecting this neighborhood's historic, family-friendly character does not prevent growth—it simply directs it to places better suited for large-scale development. Southcliff is not just where I live—it's the community I chose as a safe haven to raise my children, after years of sacrifice. I am committed to this neighborhood, and I ask that the City commit to preserving its scale, safety, and livability for families like mine. Thank you for your service and for considering my comments. Sincerely, Jaynel Gilmore [address] Vancouver, WA 98661 [email address] [phone number]"	
330	"August 14, 2045 Dear City Planners, RE: Our Future 2045 Plan Review	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	I am a long-time resident of the Village at Fishers Landing. My comments below will walk you through the key overlooked points and solutions I see with the City of Vancouver [aka the City] "Our Future 2045 Plan" zoning regulations and private covenants of our neighborhood and probably several other neighborhoods, when it comes to mixed-use housing development. 1. The Fundamental Conflict The core issue stems from two different regulatory systems operating simultaneously. The City's municipal zoning represents public policy goals - we want walkable communities, reduced car dependency, and efficient land use. Meanwhile, private covenants reflect the original intentions of property developers, homeowners and neighborhood associations, often prioritizing property values and maintaining specific neighborhood character. 2. Where These Systems Clash •Timing and Intent Misalignment: Many residential covenants were written decades ago when single-family development was the norm. The 2045 Plan zoning updates promote mixed-use density, but it is not a simply exercise to override existing legal agreements between private parties. We've all seen neighborhoods where the city rezones for mixed-use, but century-old covenants still prohibit any commercial activity particularly in Portland, and the result is a patchwork of residences and services that never developed as planned. •Scale of Impact: Zoning changes affect broad areas and serve regional and state planning goals. Covenants operate at the subdivision level with hyperlocal concerns. A corridor might need transit-oriented development from a regional perspective, but individual covenant areas within that corridor that already exist, very possibly, will resist the commercial components essential to true mixed-use success. 3. Practical Planning Challenges •Development Uncertainty: Developers and property owners will face a maze of approvals. Even with supportive zoning, covenant restrictions can kill projects or force expensive legal challenges. This uncertainty increases development costs and reduces the feasibility of innovative housing types that are in the City's plan. •Piecemeal Development Patterns: The City will end up with fragmented mixed-use districts. Properties without restrictive covenants develop as intended, while covenant-protected areas remain single-family, creating an inefficient patchwork that undermines walkability and transit viability. •Community Engagement Complications: The City's public planning processes become more complex when the residents feel their private property agreements should supersede public zoning decisions. This will create tension in community meetings and can polarize voters and neighborhoods. The current 2045 Plan has the potential of sending many, many neighborhoods into litigation. 4. Strategic Approaches •Proactive Covenant Analysis and Additions: oRealistic Zoning Categories: The City can conduct covenant research early in rezoning processes. Understanding existing restrictions will help craft more realistic zoning categories and identify where public-private partnerships might help resolve conflicts. oProhibited Small Businesses: Include in the City's plan prohibited small business and mixed-use buildings that could be problematic and impact the surrounding residents. Nuisance small businesses like auto-repair shops, marijuana depots, bars, adult entertainment, pool halls, tire shops, all-night restaurants, pawn shops, tattoo parlors and other businesses that can create traffic and parking problems, plus physical and emotional disturbances for the residents in family-friendly neighborhoods. So far in the "2045 Plan" I have not seen any protections or character preservation for existing neighborhoods. oAesthetic Preservation: Include in the City's plan design standard that addresses the aesthetic concerns of our neighborhoods	

ID	Full comment	Response
	•Proactive Geographical Analysis: There are several points of contention with "Alternative 1" and "Alternative 2" that run along the eastside of SE 164th Avenue between Highway 14 and SE 34th Street. The City can conduct a simple visual survey to evaluate where the planned mixed-use areas will find: o physical barriers, like sound walls and access points o already existing services and small business with easy access for the neighborhood before rezoning, o alternative undeveloped land on the westside of SE 164th Avenue that could fulfill the mixed-use requirement o lack of infrastructure to support the rezoning plan If the City and the State of Washington are to be successful in the mixed-use development, it will require both regulatory alignment and community buy-in. This often means longer timelines and more creative solutions, but the alternative - ignoring either zoning goals or covenant rights - typically leads to litigation and stalled development that serves no one's interests. In my opinion, a successful plan will be one that the citizens feel confident that the City listens, designs a logical approach, includes nuisance protections, and is considerate of the character of the existing neighborhoods. My ask is: •The eastside of SE 164th Avenue between Highway 14 and SE 34th Street, and The Village at Fishers Landing be designated as a Low or Medium Scale Neighborhood for all the reasons stated above [Proactive Geographical Analysis]. •Please remove the "RED" Commercial Zone on the maps for the eastside of SE 164th Avenue between Highway 14 and SE 34th Street. •If you move forward with Alternative 1 or 2 or No Action, please add a provision to prohibit nuisance small businesses to protect my family-friendly neighbors in The Village at Fishers Landing from future conflicts with the City's 2045 Plan. I welcome your feedback. Sincerely, Jolene Jolene George [address] Vancouver, WA 98683 [email address]"	
A	"When a neighborhood is re-designated from Low Scale to Medium Scale, what does that mean for single-family housing in that neighborhood, e.g. the northern half of east and west Cascade Park in Plan B? Will Medium Scale allow for replacement of existing single-family houses with single-family houses or will replacements of single-family houses only be allowed with townhomes, rowhouses, multifamily buildings, and other higher occupancy buildings? Will new construction or replacement of existing single-family houses with cafes, restaurants, small offices, and retail buildings be allowed be allowed in Medium Scale? For Plan B, has there been a traffic impact analysis conducted for the area around the I-205 and Mill Plan intersection? What plans are being addressed for Plan B to mitigate traffic congestion at and near that Mill Plain intersection? Sincerely,	Comment noted. The Preferred Alternative would zone Cascade Park as a mix of Low Scale Neighborhood, Medium Scale Neighborhood, and Mixed Use Neighborhood along Mill Plain Blvd and Regional Activity Center along SE 164th Ave. Medium Scale Neighborhood allows a broad range of single, middle, and multifamily housing types, with a maximum building height of 75 feet and allows a slightly increased range of neighborhood commercial uses compared to the low scale neighborhood. Refer to Common Response #4 Vehicle Traffic Impacts.

ID	Full comment	Response
	Paul Rosa	
B	"Hello, Meredith. Congratulations on your job with the City! I'm not at the Farm anymore, but actively volunteer re environmental issues. Sooner or later you'll see my online comment (rant?) about the five car dealerships at Mill Plain and 136th (my neighborhood). CAN THESE DEALRSHIPS BE STOPPED? What is the date for the zoning code hearing (?). I'll gladly give testimony. Be well. Jean"	Comment noted. Refer to Common Response #3: Car Dealerships
C	"Good afternoon, I understand that the city of Vancouver staff are all working towards something big in a bunch of different directions. I just want to send an email inquiring on the long term vision. Is my future to be surrounded by in n out burgers with a sprinkling of diabetes inducing Dutch bros? I just want to say it's becoming a little depressing. I moved to Vancouver after seeing downtown Vancouver. I loved the brick buildings, the old theater. Why can't the city building more of those in different ways all over Vancouver. Imagine Minnehaha could have their own neighborhood grocery store and cute bistro like Felida? We have lots of states that developed and urbanized in not so great ways, can't we look at those mistakes and try not to fall in those downfalls? (I mean you when I say we, I just live here) Lastly, stop planting trees only to torture their roots by forcing them to not grow the way nature grows. I like trees, plant and build with their expected (and known) growth stages. That's all, thanks for reading (if you read it) also, sorry if you're the admin just trying to do their job rather than wade through complaints. Hope your summer is going well. Sincerely, R Sent from my iPhone, please excuse any spelling/grammatical errors."	Comment noted. Refer to Final EIS Chapter 1 for more information on the vision for the next 20 years in Vancouver. Additional information on this topic can be found in the draft Comprehensive Plan, available on BeHeard Our Vancouver. Refer to the Aesthetics section of Final EIS Chapter 3 and the Plants and Animals section of Final EIS Chapter 4 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts.
D	"I am just going to forward this, because you are just going to tell me to stop bothering you, and I will, I just wanted to get a couple more contacts out there, so my obituary can be honest when it say ""She did try"" Thanks anyway. You knew what you were doing to us on 109th, but the dollar signs for the new apartments and additional warehouses were more important to the city. I am too tired to keep fighting but i did change the deed and left you my condo. This way, you can just tear it down and give it to the warehouse across the street. I tried, and then I gave up. there is no one, nothing that can help, and im not waiting to sleep anymore. If one of the trucks was here now, i'd lay under it and let it happen, I am that tired and defeated Tell someone to come get the cats ---------- Forwarded message --------- From: h m <[email]> Date: Wed, Jul 2, 2025 at 4:44 PM Subject: [address] rocket delivery To: <TrafficCalmingProgram@cityofvancouver.us>	Comment noted. Please refer to the comment response to comment 39.

ID	Full comment	Response
	I would like to talk to someone about the traffic on my road. It has been changed to heavy industrial and over the last five years, unliveable for me. My condo is the one most affected by the industrial complex ten feet from my bedroom window. After years of no sleep watching them work 247 in unsafe conditions. Letting them take and block the road for busses and emergency responders, crashing into the sound wall that is too low, killing two of my pets, we are looking into legal action against the business owner as well as the city of Vancouver's zoning and traffic departments. I have requested and encouraged the employee or committee who encourages this to come to my home and visit , see for yourselves what I live with, and then explain to me why I should accept that this is just the way it is: business and trucks and commerce have to be next to lower income residents because they only work in warehouses anyway, and should be grateful they are allowed housing at all. I have to call 311 sometimes 15 times per day. Seven days a week, 24 hours a day. but they never come Everyone at the city says I have to call 311. The police are asking us to stop calling. So what do we do? I have had a semi almost crash into my kitchen multiple times. The vibration and impact has destroyed the main line water to the sprinklers . I cannot go into my back yard because it is so loud at all times, banging, clanging, beeping, shouting, honking, and shaking the foundation of my home so bad I have cracks around my windows. Am I really to accept that since I do not have the income for a SFH that this is what I deserve and will live with forever? How long until you take the condos and tear them down to make the warehouse business happy? Because a tiny two lane road, with vehicles parked on both sides the entire street, cannot handle the amount of semi truck traffic we have The neighborhood next to me has ONE way in and out. They are blocked multiple times a day from leaving or coming home. School busses, police, ambulances, garbage trucks cannot get through and sometimes just leave. The intersection next to rocket delivery has so many trucks, we cannot see to leave our complex and have at least three accidents a week It's only a matter of time before it's not two cars, but a car and a small child. They have no where to play or ride bikes on this road. Nothing. So they ride on the sidewalk and in the warehouse parking lots. I watched a child zoom out from behind the disgusting smelly garbage dumpster I have to see and smell every day and almost was hit by a semi going the wrong way at 11 pm at night. Living this way is not sustainable and I'm at the end of my rope and have reached out to an attorney . I cannot sell. No one will buy this specific unit because of the traffic and noise. My pets cannot go on the porch: they have already killed two of my cats. I can't risk the last two, so they are confined now. The sound wall from the early 90s needs to be replaced and upgraded. I don't want these men staring at me while I sleep any more. The wall is falling apart anyway and dangerous, I had a huge chunk of concrete fall on me two weeks ago when the main line burst. This neeee to be addressed and not pushed to the side anymore. Before rocket delivery moved in, it was fine. Just box trucks and the occasional semi. Now it's 50 plus semi trucks 24 hours a day. I don't know what they are doing at night in the dark but I don't think it's legal in any way. Is there any actual human that can help address this and avoid litigation? Can anyone look at the photos provided and tell me why I should accept this? Traci Ellis "	
E	"Hello! Thank you for all the work you're doing on Our Vancouver. It's refreshing to see all of the effort you've put into community input. I teach History of Housing Inequality at WSU Vancouver. In that class, the students learn that essentially the crux of housing inequality has been our over reliance on single-family homes over the past century.	Comment noted. Thank you for reaching out. The City appreciated the opportunity to speak with your students last fall 2025 about the Comprehensive Plan Update, planning, and housing..

ID	Full comment	Response
	I'm wondering if there might be a way for us to collaborate on an activity to have the students think about possible solutions to historic housing inequality in Vancouver through analysis of the two plan alternatives. Even an in-class presentation could be really cool. Thank you! Shiloh"	
F	"Hello City of Vancouver Planners and Leaders, As a Vancouver resident and nearby neighbor (approx.. 136th and McGillivray) to the new Holman Lexus new construction on Mill Plain Blvd + 136th, I would like to express my sadness and concern of the scale of this concrete development within my neighborhood. I understand that this lot is zoned for Mixed Use but would like an opportunity to view the plans and discuss why the city believes it is an acceptable design to allow a 4+ story concrete parking/ vehicular storage structure and bldg totaling over 225,000sf of structure so close to street and pedestrian view? Is it the City's long range plan for Mill Plain corridor to be urbanized with unfettered bldg sizes and heights and uses with only 15% planting overage? What does Mixed-Use zoning allow and disallow? What about the residents that utilize this main roadway for their daily commute to and from home? This will set a precedent for other design and will change the expectation for those that live here. Based on the 15% minimum required landscaping and the architect LRS frontage rendering, the approval for this design shows a heavy disparity in thoughtful design in regards to the residences that live here. This email is not intended to hold back any economical advances and development for the City of Vancouver. My issues are as listed below and I'd like to know how the city to fix this: 1. The structure is too tall and close to the street – too urban. Setting it back further is no longer an option, therefore please provide additional architectural articulation to step down and soften the structure to a human scale. The rendering shows expansive amounts of glass, concrete and steel – which does not fit the surrounding architecture and pace. 2. What is the lighting design for the site and interior of bldg? Will this relatively match the existing lighting conditions of the current surroundings or brighter? I don't want this kind of light pollution here. 3. It may help to increase the planting density via more tall trees screening where adjacent to primary public view, that includes roadways. Based on the rendering snipped from LRS website, the few trees do very little to screen the 70' + tall structure. No other building in proximity is as tall and this close to the street. CTC area is thoughtfully planned and still reflects focus on greenscape campus and park-like appeal. Please help correct this. Feel free to call me back and discuss. I would make the time to meet with any of you to discuss why and how the city will this. Thank you, Linda Huynh [phone number]"	Comment noted. Refer to Common Response #3 Car Dealerships. Mixed use zoning allows a broad range of housing, commercial, and civic/institutional use types, with a maximum building height of 110 feet. Refer to the Aesthetics, Noise and Transportation sections of Final EIS Chapter 3 and the Air Quality, Greenhouse Gases and Climate; and Plants and Animals sections of Final EIS Chapter 4 for more information on the potential impacts to those topic areas, as well as proposed measures to address those impacts. Refer to the draft Code updates, available on BeHeard Our Vancouver, for more information on building heights, build setbacks, lighting design and landscaping.
G	"In light of my comments (attached), please place a moratorium on car dealerships near 136th and Mill Plain Blvd. Please preserve this neighborhood from further industrial development. Thank you, Jean M. Avery [address]	Comment noted. Refer to Common Response #3 Car Dealerships.

ID	Full comment	Response
	Vancouver, WA 98684"	
H	"Attached are photos taken from the corner of 136th and Mill Plain: -- Lexus Dealership -- former Safeway store (now empty) -- former Rite Aid (future In-and-Out Burger?) Thank you for your attention to these changes in East Vancouver. Jean M. Avery [address] Vancouver, WA"	Comment noted. Refer to Common Response #3 Car Dealerships.
I	"I need a link to the zoning map alternative changes ya'll want to make, it seems to be missing now from the site. Both alternatives totally overtake my home and turn it heavy industrial, i need that map so I can try and figure out a path to walk to i205, since that's going to be the only way we will be able to leave our complex when you authorize heavy industrial in our faces. Thanks so much, won't be able to sell my condo, can't even INSURE it because of you! At least when i lose my condo, I won't be here to see the semi trucks descend and ruin the whole street. So the link please, to the map of how you plan to destroy my future, so I can show my neighbors what you have planned for us low income losers. Unbelievable. Been trying to attend meetings and get help for 9 months, and it was all for nothing, wasn't it? You already started allowing heavy industry when you left Amazon sublet the tiny warehouse next to me, didn't you? There was never a chance for us residents, was there? We never had a chance in making a change, did we? So just the link, my neighbors might be able to sell before their banks figure it out and rip the mortgage financing away. Thanks for ruining any future i may have had, that's what I want my headstone to read. Because I can't fight the city, amazon, you just take what you want anyway. I give up, i'll leave the condo to the city, you wanted it that bad, i;ll deed it to you when I take my walk on 205 smh"	Please refer to the comment response to comment 39.
J	"Hello, I recently moved to an unincorporated area in the Vancouver UGA. I've been reading about the possibility, long-term blueprint (if not specific plan) and mechanisms for annexation (e.g. the ""Vancouver Urban Growth Area Annexation Blueprint- 2007 update"" and on your website). How can I determine whether there are any specific plans or any ongoing process that could lead to my area being annexed to the city? Thank you for your consideration, Philippe Samama [address], Vancouver WA 98682"	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. Refer to the draft Comprehensive Plan on BeHeard Our Vancouver, chapter 10 Annexation for the vision, goals and policies related to annexation.
K	"As a resident of The Village at Fisher's Landing, I oppose both rezoning Alternatives 1 and 2 currently proposed for our neighborhood. I respectfully urge the City to preserve our current zoning in recognition of the area's established character, safety, and community integrity. I believe that The village at Fisher's Landing is a gem of a neighborhood and is worth preserving as it is: - The Village at Fisher's Landing offers my family and me privacy and personal space - thanks to generous setbacks, landscaping, and quiet streets.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	- We live at The Village at Fisher's Landing because it is a stable, long-term community - where many residents have lived for decades and neighbors know one another. - It is important to me that The Village at Fisher's Landing remains a safe and family-friendly place - where children can play outside and residents feel secure in their homes. - I enjoy and love living at The Village at Fisher's Landing because its streets are walkable and well-connected to parks and schools - including Fisher's Landing Elementary and nearby green spaces. - I treasure the strong community identity that we have at The Village at Fisher's Landing - built through the decades of homeowner investment and neighborhood pride. - The Village at Fisher's Landing is convenient because it is close to majro roads services and recreaiton - yet remains distinct form the high-density or commercial zones nearby. - The Village at Fisher's Landing offers me peace, stress-free lifestyle and quiet - providing a calm retreat from city noise and high-traffic areas."	
L	"Hi Rebecca-- We've reviewed the comp plan alternatives and I have a few suggestions/comments. Am happy to put them in as official comment, too — but wanted to send them directly to you first and also am happy to discuss if needed. • Consider making the Reserve, or at least the city-owned portions (Officers Row and West Barracks), Regional Activity Center designation instead of institutional/campus. Reason being that RAC supports a mix of civic, commercial, entertainment, and open space uses that promote daily community activity and complement downtown. Some of the uses we have now and also are considering (restaurants, shops, lodging), might require conditional use permits under the Institutional Campus designation, and be more cumbersome to execute as we align with city economic development goals. • Consider reclassifying Police Admin building plot to Mixed-Use, to allow future by-right housing and commercial development • We are more supportive of Alternative 1 overall, appreciating Memory/Mill Plain area and WSDOT parcel as mixed-use, giving more opportunity in the future for housing, commercial, etc. • With regard to the city-owned properties on the Reserve, we are mainly looking to have zoning that supports the EIS statement about protecting and promoting Fort Vancouver and the Historic Reserve through inclusive programming, heritage-based economic development, and strong public investment — and want to be sure zoning changes don't make it harder to permit uses that support these goals. Thanks! -Temple"	Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative would designate the Reserve area, including the Vancouver Police Administrative parcel as Institutional/Campus. The Mill Plain area would be zoned a mix of Mixed Use Neighborhood and Medium Scale neighborhood.
M	"FYI I was uncomfortable submitting email into a big black box, so I am forwarding a copy of my CompPlan comments to a couple of names. Kristian - you expressed an interest Hailey - I trust you to make sure this finds itself in the correct hands To that other addressee - whodat? Hopefully this gets into the record before the deadline. Thanks, Steve	Comment noted. The Plants and Animals section of Chapter 4 of the Final EIS notes that implementation of proposed Comprehensive Plan policy measures would help to avoid, minimize, and mitigate potential impacts to plants and animals identified for the action alternatives. The City of Vancouver 2022-2031 Parks, Recreation and Cultural Services Comprehensive Plan emphasizes the community and environmental health benefits of nature spaces and native species. This includes Goal 5.3 Incorporate native plant species in park and natural area designs and enhancements to support pollinator species within 25 percent of the planned landscaped area, and Goal 7.23 Develop and establish restorative native planting spaces that are pollinator friendly and support the realization of a carbon neutral community. Many 2022-2031 Parks Plan goals have been incorporated into the Parks, Recreation and Cultural Services Element of the proposed updated Comprehensive Plan, including goals and policies support biodiversity, embedding pollinator habitat into public and private development, and incorporating native plans into parks

ID	Full comment	Response
	5 August 2025 ATTN: Meredith Herbst City Hall P.O. Box 1995 Vancouver, WA 98668 RE: CompPlan 2025 Dear Ms. Herbst, Thank you for the opportunity to comment on the SEPA draft EIS document, aka the Comp Plan, 2045 for the City of Vancouver. I am most interested in Chapter 4: Natural Environment and am generally supportive of the provided discussion. However, it is the discussion I didn't see that prompts me to submit comments. What concerns me, that I didn't see, was a discussion about invasive or noxious organisms and how the City can contribute to the control of these undesirable species. Invasive species are defined as plants, animals, insects, and pathogens that are introduced to an area and cause harm to the environment, economy, or society. Not all non-native species are invasive; they must also cause negative impacts to be classified as such. Noxious weeds are specifically defined as any plant designated as injurious to public health, agriculture, recreation, wildlife or property. Weeds can be native or non-native, invasive on non-invasive, and noxious or not noxious. Legally, a noxious weed is any plant designated as injurious to public health, agriculture, recreation, wildlife or property. The Washington State Noxious Weed Control Board maintains the official list and classes of noxious weeds that landowners may be required to control. Washington Governor Ferguson recently stated that "Invasive species and noxious weeds already are a big problem in Washington and species that have yet to reach our state could pose even greater challenges in the future. We all need to do our part to prevent the spread of invasive species." Examples of species not yet here include: Pomacea apple snails, several species of freshwater mussels, emerald ash borers, and creeping bellflower. A 2017 state study estimated that some species not yet in Washington, such as invasive freshwater mussels, would cost more than $100 million annually in damage and loss if they establish in the state. While some species of invasive plant are prohibited from sale, transportation, and distribution within Washington State, others can still be found at nurseries, home improvement stores, and online retailers due to their ornamental value or perceived benefits. Examples of invasive plants you might encounter for sale in Washington are: Butterfly bush, garlic mustard, knotweeds, purple loosestrife, large and small periwinkle, pokeweed, and water chestnut. Washington recently passed amendments to Chapter 16-752 WAC to ban the sale of English Ivy and its cultivars throughout the state. Major characteristics and Impacts of invasive species include: • Ecological Disruption: Invasive species can outcompete native species for resources such as food and habitat, leading to declines or extinctions of native populations. They often lack natural predators in their new environments, allowing them to proliferate unchecked. • Economic Consequences: The presence of invasive species can lead to significant economic losses in sectors such as agriculture, forestry, and fisheries. For example, invasive plants can reduce crop yields, while invasive animals can disrupt fishing industries. • Biodiversity Threat: Invasive species are considered one of the most significant threats to global biodiversity, second only to habitat loss. They can alter ecosystem functions and reduce the overall health of natural habitats. Efforts the city can take to manage invasive species include regulations to prevent their introduction, public awareness campaigns, and active removal programs. The following resources are readily available to the City to provide valuable insights and guidance.	and public spaces in Vancouver. In addition, Comprehensive Plan policy 103 Pollinator Habitats has been updated to specifically call out removal and reduction of invasive species as a City policy objective. The City also has a Pollinator Subcommittee who help inform changes to policies and regulations that support pollinators, such as increasing the use of native and climate-adaptive plants. More information about how the City handles invasive plants is on the Guide to Invasive Trees in the City of Vancouver page on the City's website. Clark County also has resources related to noxious weed management.

ID	Full comment	Response
	• Municipal Research and Services Center (MRSC) is a non-profit organization that helps local governments by providing legal and policy guidance on a variety of topics [mrsc.org] • Washington Department of Agriculture [agr.wa.gov], 360.902.1800. • Washington State Noxious Weed Control Board [noxiousweeds@agr.wa.gov] • Washington Invasive Species Council [invasivespecies.wa.gov], 360.704.0973 • Washington State University Extension Office [extension.wsu.edu], 564.397.5733 • Clark Country Weed Control [weed.board@clark.wa.gov], 564.397.6140 Invasive species represent a complex challenge that requires coordinated efforts for management and control. Understanding their impacts and implementing effective strategies is crucial for protecting native biodiversity and maintaining healthy ecosystems. A section in the Comp Plan to address existing and future invasive and noxious species would be a valuable addition to future planning. Respectfully, Stephen A. Wille [address] Vancouver, WA 98684 [email address] [phone number]"	
N	"Good Afternoon, I am sending the attached response on behalf of Southcliff Neighborhood Association Co-Chairs Chatham Olive and Bob Douglass in opposition to elements of both Alternatives 1 and 2 presented in the proposed revision of Vancouver's Comprehensive Plan, as part of the Draft EIS process. This attachment includes a detailed memorandum from the SNA, impact maps of Alternatives 1 and 2 on Southcliff, as well as 90 signatures from Southcliff residents in agreement with the memorandum which were gathered this week during a four-hour period. Residents of Southcliff will also be submitting individual comments as part of the Draft EIS response process. Thank you. Best Regards, Elson Strahan SNA Task Force Lead "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
O	"Hi I'd like to send my comments on groundwater recharge for the planning effort that is being undertaken by the planning department. Sincerely, Paul Pedone [address] Vancouver, WA 98661 PS Please explain whether I have until the 8th of September for the submission of more comments. I seem to have read that after the meeting tomorrow, no other comments will be accepted."	Comment noted.

ID	Full comment	Response
P	you must you have to as soon as possible you people need to come up with some kind of a public transportation system not the buses because they don't go the right way but it goes up and down like main street so that people could go from the waterfront to uptown it's all one area it needs to be incorporated like either a tram or poly or a free bus or if you go to any of the bigger cities in the country everybody except portland and we don't follow them everybody has one freebie circuit fred there's so many different names but they're just services that you can either get an app for or stand and wait for kind of like the ryd program you guys already have they've got the market idea in place but they need to expand it into the public where we can meet them have a ride tip the driver nobody else has to get paid any money it's a volunteer program they make money off of tips the businesses can contribute and sponsor them there's a billion ways to do this but we shouldn't have to have to take an uber or walk or drive and waste our gas and fuel and all that kind of stuff and try to park in your stupid parking lots there's parking spaces which you don't have any more so this is something that has been oncoming it should have happened sooner and the longer you wait the worse it's going to be especially when you start developing the area right around the city hall it's a major thing so it's something that is it's very simple if someone needs a job just buy a couple cars and people the one in the florida keys they use solar powered teslas which were provided to them by the city and everybody sponsors them and you just call in the app and they pick you up and drop you off that's the simplest 1 otherwise get like a little trolley car and go up and down on the weekends even to there's a billion ways to do this you'd have all these people could park uptown come to the waterfront and play or park at the goddamn waterfront and pay all the money which we do and then go up to uptown and play but it's or go to nature or new season there's so many things you can do parking here is crazy i know the mayor loves it it's her baby and she's probably in bed with all the people who have built this parking lot in the the waterfront the problem is no woman in their right mind will ever go up there past about 5:00 at night alone there's rape and murder i know you have cameras on there but all they're gonna do is watch the person rape and murder the person so let's think this all out again open up outdoor parking lots again make it safe for the public let's have some transportation systems let's just kind of you know don't we don't need to follow portland we can do this and no light rail because yes the criminals can ride it the problem is it ruins the environment all around it you look at portland and every single property value along that railroad track has gone to hell anyway i'm done good luck	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update.
Q	"Dear Ms. Herbst: I have attached to this email a copy of the letter I also mailed to you today with our comments about the City's 2045 Comprehensive Plan, Alternatives 1 & 2. Vicki Ballou [phone number]"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
R	"August 14, 2045 Meredith Herbst City Hall PO Box 1995 Vancouver, WA 98668 Dear Meredith, RE: Our Future 2045 Plan Review I am a long-time resident of the Village at Fishers Landing. My comments below will walk you through the key overlooked points and solutions I see with the City of Vancouver [aka the City] "Our Future 2045 Plan" zoning regulations and private covenants of our neighborhood and probably several other neighborhoods, when it comes to mixed-use housing development. 1. The Fundamental Conflict The core issue stems from two different regulatory systems operating simultaneously. The City's municipal zoning represents public policy goals - we want walkable communities, reduced car dependency, and efficient land use. Meanwhile, private covenants reflect the original intentions of property developers, homeowners and neighborhood associations, often prioritizing property values and maintaining specific neighborhood character.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	2. Where These Systems Clash • Timing and Intent Misalignment: Many residential covenants were written decades ago when single-family development was the norm. The 2045 Plan zoning updates promote mixed-use density, but it is not a simply exercise to override existing legal agreements between private parties. We've all seen neighborhoods where the city rezones for mixed-use, but century-old covenants still prohibit any commercial activity particularly in Portland, and the result is a patchwork of residences and services that never developed as planned. • Scale of Impact: Zoning changes affect broad areas and serve regional and state planning goals. Covenants operate at the subdivision level with hyperlocal concerns. A corridor might need transit-oriented development from a regional perspective, but individual covenant areas within that corridor that already exist, very possibly, will resist the commercial components essential to true mixed-use success. 3. Practical Planning Challenges • Development Uncertainty: Developers and property owners will face a maze of approvals. Even with supportive zoning, covenant restrictions can kill projects or force expensive legal challenges. This uncertainty increases development costs and reduces the feasibility of innovative housing types that are in the City's plan. • Piecemeal Development Patterns: The City will end up with fragmented mixed-use districts. Properties without restrictive covenants develop as intended, while covenant-protected areas remain single-family, creating an inefficient patchwork that undermines walkability and transit viability. • Community Engagement Complications: The City's public planning processes become more complex when the residents feel their private property agreements should supersede public zoning decisions. This will create tension in community meetings and can polarize voters and neighborhoods. The current 2045 Plan has the potential of sending many, many neighborhoods into litigation. 4. Strategic Approaches • Proactive Covenant Analysis and Additions: o Realistic Zoning Categories: The City can conduct covenant research early in rezoning processes. Understanding existing restrictions will help craft more realistic zoning categories and identify where public-private partnerships might help resolve conflicts. o Prohibited Small Businesses: Include in the City's plan prohibited small business and mixed-use buildings that could be problematic and impact the surrounding residents. Nuisance small businesses like auto-repair shops, marijuana depots, bars, adult entertainment, pool halls, tire shops, all-night restaurants, pawn shops, tattoo parlors and other businesses that can create traffic and parking problems, plus physical and emotional disturbances for the residents in family-friendly neighborhoods. So far in the "2045 Plan" I have not seen any protections or character preservation for existing neighborhoods. o Aesthetic Preservation: Include in the City's plan design standard that addresses the aesthetic concerns of our neighborhoods • Proactive Geographical Analysis: There are several points of contention with "Alternative 1" and "Alternative 2" that run along the eastside of SE 164th Avenue between Highway 14 and SE 34th Street. The City can conduct a simple visual survey to evaluate where the planned mixed-use areas will find: o physical barriers, like sound walls and access points o already existing services and small business with easy access for the neighborhood before rezoning, o alternative undeveloped land on the westside of SE 164th Avenue that could fulfill the mixed-use requirement o lack of infrastructure to support the rezoning plan If the City and the State of Washington are to be successful in the mixed-use development, it will require both regulatory alignment and community buy-in. This often means longer timelines and more creative solutions, but the	

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	alternative - ignoring either zoning goals or covenant rights - typically leads to litigation and stalled development that serves no one's interests. In my opinion, a successful plan will be one that the citizens feel confident that the City listens, designs a logical approach, includes nuisance protections, and is considerate of the character of the existing neighborhoods. My ask is: • The eastside of SE 164th Avenue between Highway 14 and SE 34th Street, and The Village at Fishers Landing be designated as a Low or Medium Scale Neighborhood for all the reasons stated above [Proactive Geographical Analysis]. • Please remove the "RED" Commercial Zone on the maps for the eastside of SE 164th Avenue between Highway 14 and SE 34th Street. • If you move forward with Alternative 1 or 2 or No Action, please add a provision to prohibit nuisance small businesses to protect my family-friendly neighbors in The Village at Fishers Landing from future conflicts with the City's 2045 Plan. I welcome your feedback. Sincerely, Jolene Jolene George [address] Vancouver, WA 98683 [email address] "	
S	"Vancouver Comprehensive Plan Update 2045 To: Meredith Herbst, City of Vancouver From: Jennifer Hubbert Date: August 17, 2025 Re: Opposition to Proposed Zoning Changes in Southcliff Neighborhood Dear Ms. Herbst and City Planning Officials, I am writing to formally oppose the proposed zoning changes to the Southcliff neighborhood outlined in Alternatives 1 and 2 of the Draft Environmental Impact Statement for Vancouver's Comprehensive Plan Update 2045. As a homeowner in Southcliff since 1999, I have witnessed firsthand the unique character and value that this neighborhood brings to our city, and I am deeply concerned about the irreversible damage these proposed changes would cause. My Personal Investment in Southcliff I have owned a house in Southcliff for over 25 years. I chose this neighborhood specifically for its quiet residential character, well-planned curvilinear streets, and the sense of community fostered by its thoughtful mid-century modern design. Like many of my neighbors, I have invested not just financially but emotionally in maintaining and preserving what makes this area special. The proposed zoning changes threaten to undermine decades of careful stewardship by residents who chose Southcliff for its established residential character. Fundamental Conflicts with Established Planning The proposed rezoning directly contradicts decades of established planning principles and legal commitments:	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Violation of Restrictive Covenants: Since 1954, Southcliff has operated under restrictive covenants that mandate single-family residential use and limit building heights to two stories. These covenants represent a legal commitment to maintaining the neighborhood's character, and the proposed zoning changes would effectively nullify these long-standing agreements that property owners have relied upon for nearly 70 years. Contradiction of the 2001 Neighborhood Action Plan: The city-approved 2001 Neighborhood Action Plan specifically reinforces Southcliff's single-family residential designation. Abandoning this plan without compelling justification undermines the collaborative planning process and the trust residents place in city commitments. Illogical Height Relationships: The proposal would allow buildings in Southcliff that are taller than those currently planned for the adjacent Town Plaza (Heights) district. This creates an inverted hierarchy that contradicts sound planning principles of concentrating the greatest height and density in designated commercial cores rather than residential neighborhoods. Specific Concerns About Proposed Impacts Traffic and Safety Hazards: With no new access planned from Mill Plain Boulevard, all traffic from new Mixed-Use and Medium-Scale developments would funnel onto our existing curvilinear residential streets, including dead-ends and cul-de-sacs. As someone who has navigated these streets daily for over two decades, I can attest that they were never designed to handle the volume of traffic that hundreds of new residential units and commercial spaces would generate. This will create dangerous conditions for pedestrians, cyclists, and children who use these streets safely today. Parking Crisis: The dramatic increase in density will overwhelm our existing street parking infrastructure. The proposed ""strategic pricing mechanisms"" would essentially charge longtime residents to park in our own neighborhood—an unfair burden on those who have maintained and invested in this community for decades. Environmental Degradation: The increased impervious surfaces from high-density development will stress our stormwater infrastructure, potentially rendering the recent $2.3 million Blandford Basin Stormwater Project inadequate. Additionally, Southcliff's impressive 47% tree canopy cover—a vital contributor to Vancouver's ""Tree City USA"" status—would be threatened by the intensive development proposed under these zoning changes. After 25 years of homeownership in Southcliff, I have seen how thoughtful planning and community investment can create neighborhoods that serve residents well while contributing to the broader city's character and value. The proposed zoning changes represent a dramatic departure from the principles that have made Southcliff successful, and they would irreversibly alter a neighborhood that represents an important part of Vancouver's mid-century heritage. I urge the Planning Commission and City Council to reject the zoning changes proposed for Southcliff in both Alternative 1 and Alternative 2, and instead pursue growth strategies that respect established neighborhoods while meeting our regional obligations. The city can and must find ways to accommodate growth that don't require sacrificing the unique character and livability that make neighborhoods like Southcliff valuable assets to our community. Thank you for your consideration of these comments. I look forward to your written response as required by SEPA and hope that the final Comprehensive Plan will reflect the concerns of longtime residents who have invested in making Vancouver a great place to live. Sincerely, Jennifer Hubbert, Ph.D. [email address] [phone number] -- Jennifer Hubbert (she/her), PhD	

ID	Full comment	Response
	Professor, Anthropology and Asian Studies Department of Sociology and Anthropology Lewis & Clark College Portland, OR [phone number] 2023 National Endowment for the Humanities (NEH) Award: Dangers and Opportunities of Technology https://www.lclark.edu/live/news/51698-hubbert-awarded-neh-grant-for-gun-culture-research"	
T	"I have read (a) the City of Vancouver's illustrated sales brochure from the 1950s (""Southcliff / A Restricted Residential Neighborhood"") published by the Housing Authority of the City of Vancouver, (b) the Housing Authority of the City of Vancouver/Vancouver, Washington's ""Method of Sale"" dated January 5 1955; and (c) the ""Dedication of Southcliff"" for two phases from 1956 and 1959. In every document, the City says Southcliff is limited to one detached single-family dwelling not to exceed two stories to be used only for residential purposes and limited in height to two stories above street level. In the 2045 Plan, the City is going back on its word, breaking its promises, and demonstrating the City's lack of integrity. So far, I have so far limited my objections over the ""noxious and offensive activity"" that will ""become an annoyance or nuisance to the neighborhood"" to private comments to the City. However, if the City does not promptly revise Alternative #1 and Alternative #2 to its 2045 Plan by removing the proposed zoning changes to the Southcliff neighborhood, I intend to initiate a letter writing campaign to the Columbian so everyone, including future developers of the Vancouver Waterfront and the Heights District Tower Mall Redevelopment Area/Regional Activity Center, will know that the City's promises are meaningless. V Parnell"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
U	"My husband, Steve and I moved into our Southcliff home 27 years ago. It was the best decision of our lives. We have a lovely home, on a beautiful lot. We have good neighbors and no crime to speak of. It is very troubling to learn that the city's proposed zoning changes would destroy the character of our community. We don't want high rises. We don't want ""people warehouses."" We want the safety of garage parking and quiet streets for children and adults. Years ago, we watched the Tower Mall torn down and replaced by a building site that remains vacant to this day. That is a lot of space the city can develop. And it would not destroy a long standing, well-loved community--OUR COMMUNITY OF SOUTHCLIFF! Most sincerely, Jan and Steve Holden [address] Vancouver, Washington 98661 "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
V	"We have lived in Southcliff for 15 years. We chose this beautiful neighborhood for its quiet, safe streets and a safe park for our granddaughters to play. The proposed mixed-use zoning in Southcliff will cause a large increase in traffic, reduce safety and destroy the single-family character that currently makes Southcliff one of the most beautiful, unique and desirable neighborhoods in Vancouver.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	This new zoning plan could cause a dramatic increase in traffic congestion and safety issues by funneling hundreds of cars daily onto Oregon Drive and Umatilla Way. Combining the increased traffic with the anticipated overflow from the Tower Mall Redevelopment Area and our street parking will also be overwhelmed. Increased impervious surfaces, like rooftops and driveways, will stress our stormwater infrastructure, rendering the recent $2.3 million Blandford Basin Stormwater Project inadequate for future runoff and pollution mitigation. The proposed zoning changes directly violate Southcliff's long-standing restrictive covenants (since 1954) and the 2001 Neighborhood Action Plan, which mandates single-family residential use and limits building heights to two stories. The City should protect Southcliff from incompatible projects like this proposed mixed-use zoning. Instead the City should help revitalize a major commercial street by offering financial incentives, such as fee waivers or faster permit reviews, for developers who choose to redevelop existing commercial properties along Mill Plain. Sherri Sorensen [address] Vancouver, WA 98661"	
W	"Traffic, Density, and SEPA Compliance Traffic impacts to the Southcliff neighborhood will be intolerable under every alternative—including No Action. The No Action plan's zoning, apparently imposed by the State, still triggers SEPA under WAC 365-196-620, yet no SEPA review is shown. This omission undermines both legal compliance and public transparency. Equally concerning, the DEIS presents three growth alternatives with varying housing densities but provides only vague general statements. There is no definitive traffic modeling, congestion analysis, or infrastructure capacity data to compare these alternatives in a meaningful way. SEPA requires data-driven comparisons that allow decision-makers and the public to understand trade-offs and evaluate mitigation. Without this, the DEIS does not meet SEPA's intent. The DEIS also ignores the CC&Rs; that established Southcliff in 1954 and were approved by the City. These restrictions remain enforceable and limit density far below what the DEIS assumes. By disregarding them, the DEIS risks overstating both housing potential and traffic impacts in Southcliff. Finally, the State Legislature should not impose a "one size fits all" land use framework that dictates zoning and density outcomes without SEPA evaluation. Each community has unique conditions, and bypassing proper environmental review undermines both transparency and neighborhood livability. Tree Canopy and Vegetation (p. 190) In Section "Potential Impacts to Tree Canopy and Vegetation" (p. 190), the DEIS discusses tree canopy in only general terms. Vancouver's current canopy is approximately 19%, with a City-adopted goal of 28%, yet the DEIS does not provide baseline acreage or a quantitative comparison of canopy impacts across alternatives. Instead, it offers vague statements about possible tree loss or replacement, which is insufficient for SEPA's requirement of meaningful alternative analysis. The analysis should clearly show, for each alternative—including No Action—how much canopy would be lost through development and infrastructure expansion, how much could realistically be gained through planting (using survival and growth assumptions), and what the net canopy percentage will be in 10–20 years. Without this, decision-makers and the public cannot determine whether the City's canopy goal is achievable. Mitigation measures must be tied to enforceable tools, such as the City's tree density requirements (30 units/acre), street-tree standards, and long-term monitoring commitments. Equally important, the DEIS should map canopy	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	change by neighborhood to address equity and urban heat impacts, ensuring that vulnerable communities are not left behind Comment on Tree Canopy and Avian Habitat The Draft EIS overlooks the critical role of Vancouver's tree canopy as primary habitat for migratory and resident birds. Tree canopy provides nesting, stopover, and foraging habitat, and its loss or fragmentation harms bird populations during migration and nesting seasons. The City has historically been lax in enforcing protections during nesting season, despite the federal requirement under the Migratory Bird Treaty Act (MBTA). This raises both environmental and legal risks if canopy loss is not properly evaluated and mitigated. The No Action Alternative is also mischaracterized. Due to the State-mandated density overlay, it will not preserve existing canopy and must be analyzed for habitat loss alongside the other alternatives. I request that the Final EIS: (1) Treat tree canopy as avian habitat; (2) Analyze impacts to migratory and nesting birds under all alternatives, including No Action; and (3) Commit to enforcement of seasonal protections in compliance with the MBTA. Without these corrections, the DEIS does not provide the public or decision-makers with a complete or accurate assessment of environmental impacts"	
X	"To the City of Vancouver, the Vancouver City Council and the City of Vancouver Planning Commission RE: Comments to the City of Vancouver Draft Environmental Impact Statement (EIS) FROM: Donald and Deborah Russo [address] Vancouver, Wa 98661 Residents of the Southcliff Neighborhood To the Honorable Mayor of the City of Vancouver, Members of the Vancouver City Council and Members of the Vancouver Planning Commission We purchased our home at the address noted above in the Southcliff Neighborhood in 1984, more than forty (40) years ago. As a then practicing real estate lawyer, I carefully reviewed our title commitment which included the Covenants, Conditions & Restrictions (CC&Rs) which were first adopted in 1954. The CC&Rs provide in part in Paragraph 2 that "[n]o building shall be erected, altered, placed or permitted to remain on any lot other than one detached single-family dwelling (emphasis added) not to exceed two stories in height …." These CC&Rs have remained intact for over seventy (70) years. Each of our neighbors in Southcliff have purchased their homes in reliance on those very same CC&Rs. We are acutely aware of the need for increased housing options, reduced rents and reasonable home prices. This is an important issue in Vancouver, much of our entire state and the Pacific Northwest. Directly as a result of this need, our Legislature passed House Bill 1110 in 2023. This Bill mandates that cities adopt middle housing ordinances within six months of their next comprehensive plan update. More specifically, this Bill calls for fourplexes on residential lots and sixplexes on lots within a quarter mile of major transit stops. The City of Vancouver Comp Plan Update calls for the introduction of mixed-use, medium-scale and low-scale neighborhood changes to Southcliff. These proposed changes to Southcliff would turn our neighborhood on its head. First of all, and most importantly, these proposed changes are prohibited by the Southcliff CC&Rs. As noted above, our CC&Rs prohibit any building to be erected on any lot "other than one detached single-family not to exceed two stories…." These long-standing CC&Rs trump the Comp Plan Update. Furthermore, even if these	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	CC&Rs did not exist, this neighborhood could not absorb multi-family housing and mixed use buildings on narrow streets that end in cul-de-sacs or dead ends and with no sidewalks. The homes in Southcliff were constructed in the mid-1950's. When remodeling our home several years ago, we found a newspaper in the walls as a sort of insulation with a date from 1955. Our homes are largely mid-century modern in nature. Adding multi-family housing and mixed use buildings would destroy our unique neighborhood and its architectural integrity. We were personally involved in the negotiations for the planning of the former Tower Mall, along with many of our neighbors. We were surprised to learn of the proposed height and density of that development just across the street from Southcliff. Despite objections from Southcliff neighbors, the Tower Mall redevelopment was adopted without recognizing the legitimate objections of our neighborhood. This comp plan proposal would allow for buildings in Southcliff that are even taller than those planned for Town Plaza. And yet there was no mention of this comp plan proposal at those meetings. As noted above, Southcliff has narrow curving streets that end in cul-de-sacs or dead ends. There are neither through streets nor sidewalks. We walk in those streets on a daily basis because there are no through streets. We walk our dogs in the streets, as do our numerous neighbors with dogs, because there are no other places to walk. Many of us also bicycle on the streets in Southcliff because they are safe. The traffic associated with the new development called for in this proposed comprehensive plan update will immediately overwhelm our streets. More significantly, the development will result in severe traffic congestion and more importantly, safety hazards for our walkers and bicyclists. We have five (5) very large, very old oak trees on our eastern boundary along Manzanita Way. More than ten (10) years ago, we asked a City arborist to examine one of the oak trees due to a safety concern. The arborist estimated that the oak tree in question was over two hundred (200) years old, dating the tree back to the days of Lewis and Clark. This proposed development threatens these trees and the families of squirrels who live there, not to mention the canopy of leaves that provide shade to this neighborhood. The proposed alternatives to the draft Environmental Impact Statement are not suitable for Southcliff for a host of reasons. First of all, and most significantly, the CC&Rs of Southcliff have been in effect for seventy (70) years and House Bill 1110 (Middle Housing Bill) only applies to subdivisions with restrictive covenants addressing the number of homes on a single lot which are adopted after the effective date of the House Bill. This is clear from a reading of the legislative history of this Bill. In particular, Washington Realtors and its Legal Hotline Lawyer, Annie Fitzsommons, stated in a published video on June 9, 2023 regarding the newly enacted Middle Housing Bill, "[s]pecifically, the question I've been receiving is whether the new law allowing higher-density housing would override CC&Rs that prohibit additional construction on existing single-family residential lots. The Middle Housing Bill does not supersede CC&R's in this scenario if the CC&R's are in place by July 23, 2023. If there are already CC&R limitations on increased density by July 23rd, 2023 (the effective date of the new law), those CC&R's will continue to govern. Therefore, if the CC&R's specify that only one home is allowed per lot, the association is not obligated to accept higher-density housing within the community." (emphasis added). Secondly, the Comprehensive Plan Update is not suitable for Southcliff due to its historic design, its curving and dead-end streets, and significant environmental concerns. We respectfully submit that the Comprehensive Plan Update, while needed in Vancouver, does not belong and cannot be located in Southcliff. Respectfully submitted, Donald and Deborah Russo "	
Y	"Subject: Transmission Line Conflict for Alternatives 1 & 2 in the Southcliff Neighborhood Both Alternatives 1 and 2 contemplate an overlay of Mixed-Use and Medium-Scale development between Manzanita Way and Umatilla Way, north from Oswego Drive to East Mill Plain Boulevard. In this corridor there are high voltage	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	transmission lines originally installed and managed by the Bonneville Power Administration (BPA). These lines were transferred to the Clark Public Utility District (PUD) in 2009. The transmission lines run from a substation near HWY 14, north through the Southcliff neighborhood, across East Mill Plain Blvd., and terminating at East 18th Street. Notably, these transmission lines have a 100-foot easement as shown on the maps below, which were obtained from the BPA at the time the transmission lines and accompanying easements were transferred to the PUD. According to the PUD, these lines are energized at 115kV (115,000 volts) and, per OSHA standards, require a minimum 15 feet of clearance. Alternative 1 and Alternative 2 map overlays would permit Mixed-Use and Mediumscale development of up to 8 stories (110 feet) and 5 stories (75 feet) respectivelly in the Umatilla – Manzanita corridor. Such development would certainly not be permitted within the 100-foot easement. In fact, neither would the Low-Scale Southcliff parcels be allowed to develop up to 3 stories (45 feet tall) within the transmission line easement. Further, the permitted building height of these overlays outside the easement would seemingly not be appropriate even adjacent to these high voltage transmission lines. Accordingly, a revision of both the Alternative 1 and Alternative 2 maps to remove both Mixed-Use and Medium-Scale overlays in the Umatilla – Manzanita corridor is necessary as they conflict with the established 100-foot easement for the PUD's high voltage transmission lines."	
Z	RE: Objection to Alternative #1 and Alternative #2 of the City of Vancouver's "Our Vancouver - comprehensive plan 2045"...affecting our home at Lot 10, SOUTHCLIFF-6, according to the plat thereof, recorded in Book G of Plats, page 208, records of Clark County, Washington (the "Plat Map") and the rest of the Southcliff Neighborhood...	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AA	(repeat) regarding a lack of discussion about invasive or noxious organisms In chapter 4: natural environment	Comment noted.
AC	"I have lived in Southcliff since January 1986 and have always found my neighborhood to be both relaxing and safe, so much so that I often walk a 1.4 mile loop after dark, when [sunscreen] is unnecessary. I reached 80 in June, so I have less reason than younger persons to be self-serving and subjective for opposing the proposed Comprehensive Plan update. From my perspective, the threshold question is not whether 43,198 new jobs will [arrive] by 2045, but rather what those new jobs will be, and specifically how well they will pay. Objectively, it seems evident that low-paying jobs will be created by the proposed zone changes. I believe that it is still the American dream to own an home, rather than to rent an apartment, or even own a condominium. A home provides privacy, freedom from excessive noise, and even security not available to apartment dwellers or condominium residents. Additionally, it provides the opportunity to garden, very important to this homeowner who does all of his own gardening and lawn mowing and grows literally thousands of flowers each season. High paying employers in need of highly skilled employees will not relocate to Vancouver if they do not believe that six-plexes and apartment buildings will enable recruitment of necessary talent. Instead, Vancouver [ingly] will be relegated to lower paying employers whose employees neither expect nor even hope to own their own homes. The best employers will have located their business elsewhere. The proposed plan update for Southcliff, if implemented even partially, makes it clear where Vancouver stands on homeownership, or even increasing issuing building permits; instead, Vancouver's recent history [will/with feature] extreme use of eminent domain to gobble up very fine homes in one of its best neighborhoods. The Growth Management Act puts Vancouver at a crossroads. That our population will increase is certain, but whether its [tax above] keeps pace is uncertain. Vancouver must be able to entice the most prosperous employers if it is to continue its generous services for the low-income and homeless. Home ownership must be prioritized, not discouraged.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Respectfully, Charles Burns [address] "	
AD	"(repeat) I have lived in Southcliff since January 1986 and have always found my neighborhood to be both relaxing and safe, so much so that I often walk a 1.4 mile loop after dark, when [sunscreen] is unnecessary. I reached 80 in June, so I have less reason than younger persons to be self-serving and subjective for opposing the proposed Comprehensive Plan update. From my perspective, the threshold question is not whether 43,198 new jobs will [arrive] by 2045, but rather what those new jobs will be, and specifically how well they will pay. Objectively, it seems evident that low-paying jobs will be created by the proposed zone changes. I believe that it is still the American dream to own an home, rather than to rent an apartment, or even own a condominium. A home provides privacy, freedom from excessive noise, and even security not available to apartment dwellers or condominium residents. Additionally, it provides the opportunity to garden, very important to this homeowner who does all of his own gardening and lawn mowing and grows literally thousands of flowers each season. High paying employers in need of highly skilled employees will not relocate to Vancouver if they do not believe that six-plexes and apartment buildings will enable recruitment of necessary talent. Instead, Vancouver [ingly] will be relegated to lower paying employers whose employees neither expect nor even hope to own their own homes. The best employers will have located their business elsewhere. The proposed plan update for Southcliff, if implemented even partially, makes it clear where Vancouver stands on homeownership, or even increasing issuing building permits; instead, Vancouver's recent history [will/with feature] extreme use of eminent domain to gobble up very fine homes in one of its best neighborhoods. The Growth Management Act puts Vancouver at a crossroads. That our population will increase is certain, but whether its [tax above] keeps pace is uncertain. Vancouver must be able to entice the most prosperous employers if it is to continue its generous services for the low-income and homeless. Home ownership must be prioritized, not discouraged. Respectfully, Charles Burns [address] "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AE	"Dear Sirs: My first comment is that of the five (5) officials that will be evaluating the Comprehensive Plan is that three (3) of the five (5) live in Oregon. It seems unfair to the Vancouver residents to have other state owners evaluting possible changes in a Washington state neighborhood. I have been a Southcliff homeowner since March of 1980. At that time my wife and I were looking for a Vancouver neighborhood htat had nice homes with enough lot size to allow a play area for children and pets. We were fortunate enough to find a home for sale in the South Cliff neighborhood. It turned out it was a Peter Walker designed home. At the time he was a noted home designer and builder in Vancouve, Washington. My wife and I became the third owner of this home. This particular home was mostly single level with a one third basement, three bedrooms and two baths. Our neighbors on both sides and across the street were original homeowners in the South Cliff neighborhood. One still occupies their original home. In March of 1980 the South Cliff neighborhood was one where your children could play, ride their bikes in safety and walk your dog without a care in the world. The neighborhood was just right to live in, commute to work in and enjoy throughout the year.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Now 2025 the GMA is proposing major changes in the now ideal neighborhood. The GMA has three MIXED-USE plans. The first plan along Mill Plain Boulevard will allow building to max out at EIGHT STORIES with both businesses and apartments. The second plan would allow TWO to FIVE STORIES for civic/institutional buildings and neighborhood commercial space, also aprtments. Finall, the third plan would allow THREE STORIES plus six units per lot apartments. The above three MIXED-USE plans would DRASTICALLY change our ideal neighborhood to more of an inner city type of neighborhood/Ghetto. The traffic and parking would cause major changes in the streets. The streets that once were fine and SAFE for walking and riding of bicycles would not be safe. For example: my daughter used to live in the Sellwood and East Moreland neighborhood of Portland, OR. After zoning as proposed here in South Cliff the small business were bought out and the local homes sold to developers. Next thing that happen was hte streets had so much additional traffic and parking that the reamining local residents had only their garages for safe parking. All the on the street parking became very dangerous. On a regular occurrnece parked cars were broken into and or damaged during parallel parking. South Cliff does not want this type of neighborhood. At present in the South Cliff Neighborhood there is set of City Covenants that have been in force for decades. They have been given full support by the neighborhood associations of Vancouver and city. They have been perused and approved by lawyers in conjunctions with the neighborhood associations of Vancouver. The South Cliff neighborhood also has a governmental High Power Electrical line running through it. This line has caused some special boundary lines to be set so as to provide the home along it to be safe. Future business of three, five and eight stories would also be a concern to new construction. Presently in the nearby area formerly know as Tower Mall and Vanco Driving Range have a great deal of space for commercial and apartment building. Shouldn't those areas be built up prior to the MIXED-USE plans put into action? Also, the downtown areas of the City of Vancouver have many buildings for lease/rent available for new businesses. Along with several Condominium apartments ready to lease/rent or being built at this time. (2025) In summary, I believe the following reasons should be given considerable thought before the present IDEAL neighborhood of South Cliff should be rezoned. 1) The additional height on eight, five and three story building would not fit in with the history of the neighborhood. 2) Our present Covenants support our existing neighborhood and have been previous approved. 3) The historic IDEAL neighborhood would disappear among the multistoried new businesses and apartment structures. 4) The existing SAFTY and TRAFFIC patters would disappear and the neighborhood would take on an INNER CITY / Ghetto look. 5) The now existence NONE STREET parking would become a major SAFTY concern. 6) The present City of Vancouver should use the existing uninhabited buildings, offices and land in the area for Commercial and Apartment construction. To the five officials, mayor and city council please give the above statements your thorough consideration before implementing and updating the GMA developmental plans presently being evaluated."	
AF	"""Hello, I just submitted this comment online (below). I'm attaching a few photos of the Lexus dealership, in case you don't get to this part of town. Regards, Jean Avery I would like Vancouver to live up to its vision statement: as a city for """all residents,""" offering """quality of life""" and """walkable neighborhoods,""" and """address[ing] climate change."""	Comment noted. Refer to Common Response #3: Car Dealerships

ID	Full comment	Response
	Please make us proud of """"community well-being"""" and """"community feel,"""" with parks and open spaces and places for people to gather. Business and people CAN go together, as at Columbia Tech Center. By contrast, fast food construction and dealerships on Mill Plain are a terrible sight--using vast areas of land, with little or no community value. I fear the planning team has missed the mark. I know you're working hard for the future. You can do better! """	
AG	"Mayor -City Council When considering to change the zoning of historical Southcliff neighborhood think of the consequences! Unsafe streets for the many walkers, insufficient parking. A big increase in traffic bringing many problems to what has beeen a quiet problem free neighborhood. Thank you A & G Hanseler 50 year Residents of Umatilla Way"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AH	"""August 20, 2025 To the Vancouver city planners: My husband and I moved to Southcliff in 2022 to retire. We wanted space for him to have a 3-car garage so he could have his own workshop, so we had the old 2-car garage torn down and replaced with a nice, new 3-car garage. Plus I like to garden and plant native trees on all the land, which I've been doing. I've planted small trees and looking forward to watching grow into large trees. In addition, I've planted a pollinator garden which has attracted different species of native bees. I like the CC&R's because they keep the character of the neighborhood. I like that there are controls on what can be done to houses in the neighborhood, so that its character is maintained. In order to appease the city, I would be OK if the CC&R's were changed to allow ADU's (which are currently prohibited), although we won't be adding one, as we like having all this land. Everyone uses our streets here, my husband walks around here, and I do too. I like having the freedom to go on morning or afternoon walks on quiet streets and not have to worry about too many cars. I like to see the greenery and the flowers around the neighborhood. This neighborhood is convenient to everything, to shopping and downtown. We are close to downtown and to the large Fred Meyer shopping center on Columbia Street. If I want to take a longer walk, I can walk to either downtown or the Columbia shopping center for coffee. Plus we can ride our bikes downtown or to East Vancouver, and we are close to the start of many Vancouver Bike Club rides. I feel that we should keep this neighborhood residential, like it has been, it's what we paid for and recently moved into. We put a lot of money into remodelling the garage, thinking this would be our permanent home. I am concerned that if it is rezoned, it will generate a lot more traffic and noise, and change the character of the neighborhood. I would suggest, instead, redeveloping the areas I've listed below, where business has declined and stores have closed due to the pandemic or before the pandemic. All the areas below are near to an actual or proposed Vine bus line. The areas below should be redeveloped with high-rise housing and businesses, as they are already covered with an impermeable surface (parking lot) and lack trees and greenery. Here is a listing of the developable areas I'm currently aware of: 1. A huge parking lot where a K-mart used to be on Andresen.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	2. A huge parking lot in Vancouver Plaza, on which several big-box stores and businesses have failed or are failing such as Crunch Fitness, the Regal cinemas, and an old restaurant that failed and whose building has never been taken over by a new restaurant. 3. Another huge parking lot for several big-box stores off of Hazel Dell near 76th and 99th Ave. It appears most of the big-box stores there have failed (there's a few that survive). 4. In addition, the area around Mill Plain and Chkalov would be a great candidate for redevelopment. The businesses there don't appear to be in trouble, but there is never enough parking there for the businesses there or for the Fred Meyer, and the Fred Meyer has been run down for years (not one I prefer to shop at). All of the above-mentioned sites would be great sites for high-rise housing and businesses, which I agree Vancouver needs, as I do oppose expanding the urban growth boundaries further. Developing these sites wouldn't require many trees, if any, to be cut down, nor the creation of new impermeable services. In fact, if they're redeveloped, hopefully green areas would be added where trees and swales can be added, thus making the areas greener while adding new housing and businesses. Additionally, the Fourth Plain, Andresen, and Mill Plain sites are near Vine bus stops and I believe the Hazeldell site is near a planned Vine bus stop. Thank you for taking the time to read this letter. Sincerely, Diane Wills [address] Vancouver, WA 98661 [phone number] """	
AI	"August 22nd, 2025 To: Vancouver City Planners, regarding the Southcliff neighborhood My name is Frank Woodbery and I live at [address] in the Southcliff neighborhood. My wife and I moved here in 1997 as I had accepted a position as an engineer at Hewlett Packard. While I was at my new job, my wife would scour various neighborhoods and real estate listings looking for our future home. We looked at many homes but we both fell in love with the Southcliff neighborhood. The homes date to the '50s with large lots, mature trees and well maintained properties. It is a safe, quiet and beautiful neighborhood, truly a small oasis within the City of Vancouver. We found a home that we could afford and quickly made and offer and bought the house. We are now friends with several of our neighbors. It's a great place to live. I am now retired from HP, but do volunteer work for the City. I recently found out about and have read the proposed zoning changes currently being put forth by the City's Draft EIS. I vigorously oppose both Alternative 1 and Alternative 2. There are several problems with these proposals: Both alternatives would violate our neighborhoods regulations which only allow for one single family home, no more than two stories high. I understand these original regulations have been in place since 1954. I understand that the Heights District redevelopment was intended to be the location of commercial and mixed use high-rise buildings would be located. These buildings belong in The Heights, not in Southcliff. Getting in and out of the neighborhood with only three streets entering Mill Plain would mean a row of cars trying to get in or out. Vehicles entering the businesses, and new high density housing would create a traffic problem on both Mill Plain and within Southcliff. Parking for the businesses and multi-family units would spread into the neighborhood. The buildings and associated noise, traffic and potential crime would completely destroy the character and livability of the historic neighborhood of Southcliff. There is undoubtedly much more suitable land along Mill Plain that would	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	better accommodate the construction of high-rise, multi-family housing and businesses without tearing down parts our beautiful old neighborhood. I would like to thank you for reading this letter. Please consider my thoughts! Best regards, Frank Woodbery [address] Vancouver, WA 98661 "	
AJ	"Years ago in Portland we had Mayor Bud Clark. He got the citizenry together to plan out what the city should look like and have over the next 20 years. That plan is what we see in Portland today. It is a time consuming task, but in the end you have the blueprint of the hopes and dreams of your people. The amount of innovation was amazing. It gave the mayors plans for the next 20 years to draw from. Like Vera Katz took on the Pearl district that was in that plan. Her job was to figure out how to make that a reality. She circled the area and all taxes and fees generated were used to develop that area. That initial investment has generated lots and lots of development throughout the are. Take a look at the background of the Bud Clark plan and its crude map then look at Portland today and you will see that exercise was completely transformative. Just an FYI. Im a Portlander and have seen the power of this 20 year plan first hand from participating in its creation to seeing it come to life. Good luck... You set your own path, but this was an amazing exercise in community innovation and involvement. It has not been repeated even though it was suggested to do so every 20 years. Bud had amazing vision on this one..."	Comment noted.
AK	"My name is Julie Falardeau and I live at [address] in the Southcliff neighborhood in Vancouver, WA. I have reviewed the proposed zoning changes outlined in the City's Draft Environmental Impact Statement (EIS), and I am writing to express my strong opposition to the adoption of both Alternative 1 and Alternative 2 as currently proposed. My concerns include the following: 1. Conflict with Existing Zoning Regulations Both alternatives directly conflict with Southcliff's longstanding zoning regulations, which have limited development to one single-family dwelling per lot, no higher than two stories, since 1954. These protections have helped preserve the character and integrity of our neighborhood for over 70 years. 2. Environmental Impact and Tree Loss The proposed introduction of commercial and mixed-use development would require the construction of larger, multi-story buildings, leading to the loss of mature trees and critical wildlife habitat. This would irreversibly alter the natural landscape of our neighborhood. 3. Deviation from the Heights District Plan I was under the impression that the Heights District was intended to accommodate commercial and mixed-use high-rise development. If the City seeks greater density, this should be concentrated within that district, rather than imposed on a stable, historic residential neighborhood like Southcliff. 4. Parking and Traffic Congestion Eliminating parking requirements for new development would result in significant overflow parking on neighborhood streets, compromising walkability, increasing noise, and diminishing the quiet residential character we value. 5. Traffic Safety and Access Concerns	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Access to new commercial and mixed-use developments would not come from Mill Plain, but instead through our residential streets. This would dramatically increase traffic congestion and pose serious safety risks for pedestrians and cyclists, particularly children and seniors. 6. Stormwater and Pollution Impacts Southcliff's neighborhood rain garden was designed to manage current levels of stormwater runoff. Introducing hundreds of additional vehicles and impervious surfaces would increase runoff and pollutants, threatening both environmental quality and infrastructure integrity. 7. Historic Neighborhood Character Southcliff is a unique and well-preserved mid-century modern neighborhood. Its architectural heritage and community character deserve to be protected—not sacrificed for speculative future growth that may or may not occur by 2045. For all of these reasons, I respectfully urge the City to reject Alternatives 1 and 2 as they currently stand and to preserve Southcliff's zoning and neighborhood integrity. Sincerely, Julie Falardeau"	
AL	"To: Mayor Anne McEnerny-Ogle Mayor Pro Tem Erik Paulsen Councilmember Sarah J. Fox Councilmember Bart Hansen Councilmember Kim D. Harless Councilmember Diana H. Perez Councilmember Ty Stober Rebecca Kennedy, Deputy Director, Community Development Bryan Snodgrass, Principal Planner Chad Eiken, Director, Community Development, SEPA Responsible Official Meredith Herbst, Associate Planner, Community Development From: Elson and Jan Strahan, Southcliff Residents, 604 Umatilla Way Date: August 23, 2025 Subject: EIS Comment on Our Vancouver - Comprehensive Plan 2045 This response is in opposition to elements of both Alternatives 1 and 2 presented in the proposed revision of Vancouver's Comprehensive Plan as applied to the Southcliff Neighborhood. However, along with the objections to the Alternatives, this comment also outlines a solution with the newly designated Regional Activity Center. As stated in the August 7th Memorandum to the Vancouver City Council and planning staff from Southcliff Co-Chairs Olive and Douglass, as well as Elson in his capacity as SNA Task Force Chair, "the overlay of both Mixed-Use and Medium-Scale parcel designations is completely inappropriate with regard to neighborhood ingress and egress, neighborhood street plan, established covenants, unique character, historical significance, and environmental considerations. Further, it is incompatible with the impact of Southcliff's close proximity to the formerly designated Heights District Tower Mall Redevelopment Area, which is now designated as a Regional Activity Center."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Importantly, that memorandum was supported by 90 Southcliff residents who added their signatures of agreement, which were obtained in a four-hour period as neighbors came together to voice their support. For purposes of this memorandum, we want to primarily focus on one important aspect of the August 7th memorandum, Southcliff's proximity to what is now designated as the Heights Regional Activity Center. See the Southcliff and Regional Activity Center area maps in Appendix A. 2 Legislative Zoning Mandate and a Proposed Solution for the Heights Clearly, the City must find a way to develop a plan that meets the density requirements imposed by the State's changes in the Growth Management Act to accommodate the addition of some 40 thousand new housing units and an almost equal number of new jobs by 2045. The Alternatives attempt to address this with zoning overlays throughout the City as a means to meet these targets. As noted, with respect to the Southcliff Neighborhood specifically, the overlays include adding unsuitable Mixed-Use and Medium-Scale development. If these overlays are not to be imposed on Southcliff, where would that density be best accommodated? The answer is clearly the newly designated Regional Activity Center. Southcliff Relation to the Heights District Plan, Now Regional Activity Center Elson was pleased to serve on the Heights District Plan Advisory Committee and supported the final plan adoption, including the Tower Mall Redevelopment Area. The Tower Mall Redevelopment Area called for 1.58 million square feet of new development, including an addition of 1,340 residential units and over 120,000 square feet of commercial and office space, as well as 119,000 square feet of hospitality, civic, and church/multi-purpose. Maximum height within the District was restricted to 80 feet or 6 stories, with a focus on the taller structures being in the core plan area. Clearly, Southcliff residents recognized that they would be significantly affected by this development, with increased parking demands on neighborhood streets since off-street parking minimums are contemplated to be severely reduced or eliminated, as well as other impacts. However, there was no anticipation of the dramatic revision of the Washington State Growth Management Act and its requirement to significantly revise the City's zoning. Importantly, while the height limitation in the Heights District Plan was 6 stories (80 feet), the Regional Activity Center has a minimum building height of 3 stories and no maximum building heights. Accordingly, the potential impact on Southcliff with the change from the Heights District Plan to that of Regional Activity Center is even more certain, so the proposed Mixed-Use and Medium-Scale overlays in Southcliff compound this impact even more. As noted in the August 7th Memorandum, City staff has indicated that the Council has not yet set a policy direction in regard to building height and density under the Regional Activity Center designation, and that it could, but is not obligated to remain as contemplated in the Heights District Plan. This is a critical distinction and a significant opportunity. 3 Southcliff Mixed-Use and Medium-Scale Overlay Not Functional Under Alternatives 1 and 2, there is a proposed change to Mixed-Use of parcels in Southcliff that directly back up to Mill Plain Boulevard. In addition, both Alternatives provide for an overlay of extensive Medium-Scale development in Southcliff. Mixed-Use "Provides for a broad range of housing, commercial, and civic/institutional use types, with building heights of 3 to 8 stories (maximum of 110 feet tall)." MediumScale "Provides a broad range of housing types and building heights of 2 to 5 stories (maximum of 75 feet tall)."	

ID	Full comment	Response
	These overlays fail to recognize that there will be, according to City planning staff, no ingress or egress from Mill Plain Boulevard, as it is a main arterial. Thus, all traffic associated with such development would need to access the Mixed-Use and MediumScale developments from three residential streets, none of which is a thoroughfare to an adjoining area, and all of which are only accessed by Mill Plain. Further, one of the three streets, Umatilla Way, is right turn only entrance and exit, and it is the primary street access for the largest proposed massing of both Mixed-Use and Medium-Scale. In addition, related parking would undoubtedly saturate neighborhood streets, particularly when combined with overflow parking from the Regional Activity Center. Also, these designated parcels are primarily located on dead-end streets with cul-desacs that hardly accommodate current neighborhood street parking. This presents both a density problem as well as a public safety issue. And finally, as noted in an already submitted comment to the EIS, the Alternatives failed to recognize a 100 foot easement for the PUD's high voltage (115kV – 115,000 volt) transmission lines that traverse Southcliff between Manzanita Way and Umatilla Way, under which no Mixed-Use, Medium-Scale, or even Low-Scale development would be allowed, although these are designated overlays on the Alternative maps. Regional Activity Center Best Suited to Absorb Density Requirements As previously noted, the Mixed-Use overlay maximum height of 8 stories greatly exceeds the maximum height in the Heights Plan of 6 stories, and the Heights Plan envisions the taller structures to be in the center of the development. Even the Regional Activity Center zoning, with a minimum height of 3 stories and no maximum building height, enables a step-up from smaller structures along throughfares to taller structures or higher in the development core. A Mixed-Use overlay in Southcliff of up to 8 stories directly abutting Mill Plain is not only incompatible with the Southcliff neighborhood, it is in direct contrast to the thoughtful planning for the Heights District. 4 While the Mixed-Use allowance of up to 8 stories (110 feet) exceeds the development and density standards of the Heights District Plan of 6 stories (80 feet), and the Medium-Scale allowance of up to 5 stories (75 feet) is on par with the highest density standards of the Heights District Plan, as previously noted there is no height limitation for the Regional Activity Center. Accordingly, rather than imposing ill-suited Mixed-Use and Medium-Scale overlays in Southcliff, it seems much more appropriate to shift these densities to the Regional Activity Center. Development of buildings in the Center of at least 8 stories would at the very least match the Mixed-Use heights proposed for Southcliff, as well as other areas throughout the City. In addition, the Regional Activity Center could include building heights of more than 8 stories as well as a robust mix of buildings between 3 stories and 8 or more. Moreover, since the Regional Activity Center is an absolutely clean slate, all of the roads and necessary infrastructure, which need to be developed anyway, can be designed at the outset to maximize the efficiency and best accommodate the increased density. Such planning and development has been incredibly effective and attractive on the Vancouver Waterfront and would seemingly be as successful in the Heights Regional Activity Center. Final Thoughts It is understood that Vancouver Councilmembers and planning staff must find a way to manage projected population growth through the Comprehensive Plan that will facilitate the development of another 40 thousand housing units and related services by 2045. While the new Growth Management Act's significant impact on the City's Comprehensive Plan was not anticipated, Southcliff residents had already participated in planning for the Heights District and its Tower Mall Redevelopment Area, recognizing that the Vancouver community was growing and needed to expand its housing and accompanying urban services.	

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	Since the Heights District's Tower Mall Redevelopment Area is now a designated Regional Activity Center, it can best accommodate the density development that has been proposed in the Alternatives for Southcliff. Accordingly, it seems counterproductive, unnecessary, and contrary to sound planning principles to decimate the historic Southcliff neighborhood with the Mixed-Use and Medium-Scale overlays. As detailed in the August 7th Memorandum, such density would negate the $2.3 million investment in the recently installed bioretention systems in the Southcliff and Dubois neighborhoods to protect the Blandford Canyon Watershed, and would significantly reduce Southcliff's 47% tree canopy, which is by far the highest level in the City. 5 Moreover, these overlays conflict with existing covenants in Southcliff as established by the then City of Vancouver's Housing Authority in 1955 and through its six development phases to 1966, which have remained in force by Southcliff residents for 70 years. See the brochure from the VHA in Appendix B provided as an exhibit by the Washington State Department of Archaeology and Historic Preservation, which is just one of many such documents of record. Importantly, when Washington State Architectural Historian Michael Houser sent us this brochure, he strongly encouraged Southcliff Residents to submit a nomination to have the neighborhood listed as a historic district since it had been so well preserved: "Based on what I have seen, the area would be more than worthy of listing on the State and National Register! We have not listed a neighborhood like this anywhere in the state yet..." Southcliff residents are and have been steadfast in their stewardship of this neighborhood, are earnest in maintaining its preservation in the future, and will do so as a neighborhood that can thrive in conjunction with the future growth of a vibrant Regional Activity Center. "	
AM	"Subject: Opposition to Draft EIS Alternatives 1 and 2 for SouthCliff Neighborhood I have lived in SouthCliff for just shy of 20 years. My daughter was born in our home at [address]. When she was little we walked every day, rain or shine, to SouthCliff park and enjoyed its beauty. I remember when she was about 10 years old, talking about our favorite places on earth, and she said her's was our backyard. She is now entering Junior year at VSSA. We have had the same wonderful neighbors on either side of us and across the way since we moved in. I really love this little piece of Vancouver and hate to see anything done by City Council which will diminish it. I am aware of the needs for Vancouver to grow inward and upward to accommodate its many new residents now and in the future. I was excited to see the City's plans for Tower Mall, adding some 1400 units in the near future. Taking dilapidated buildings and vacant lots and turning them into useful and economically active areas is exciting and should be celebrated. Conversely, converting thriving historic neighborhoods into something else should be done with great care only after the impact of other changes have been assessed. I urge City Council to plan for growth carefully and not lose some of the established neighborhoods.with their beauty, charm and history. Let's embrace growth through repurposing unused land like Tower Mall while still preserving SouthCliff, my family's home. Adam Rasky, MD [address], Vancouver, WA 98661 "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AN	"Bridget Marick & David Curran [address] Vancouver, WA 98661-5921 August 23, 2025 Meredith Herbst & Vancouver City Planners, City Hall	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	PO Box 1995 Vancouver, WA Dear Ms. Herbst and Vancouver City Planners, My husband, David, are both medical professionals and we moved to Vancouver in November 2015. We did not want to live in Portland for several reasons. Therefore, we limited our search for a home to Camas and Vancouver. We looked at several properties including 13912 NE 7th Place in Vancouver which is a nice home. It was built in 1992 with a 3 car garage and everything one would think a home buyer would want. However, the back yard of this particular property butts up to duplexes and multi-family homes. We did not buy the house on 7th Place for that reason. David and I chose to buy a home in Southcliff because it is a beautiful neighborhood with larger lots and the majority of the homes are established and well maintained from the 1950's. Our home at [address] was built in 1957 by Bob and Wilma Dungan. They lived in this home for 30 years until they sold it to David and Kelly Christel. The Christels lived in this home for 28 years before my husband and I bought it in 2015. Like other houses in Southcliff, our home is well built by an individual, not a developer, which makes the entire neighborhood unique. Southcliff is not a cookie-cutter, put up over night, kind of a neighborhood. Because Southcliff is an older, established neighborhood, there is a large, mature tree population, which is another reason my husband and I love the neighborhood. With mature trees there are birds, including owls, and other wildlife, like deer, raccoon, and Opposum. You can catch a glimpse of them if you are up at the right time of early morning or night. Without a doubt, trees will be taken down to allow for mixed use, medium scale, and even low-scale development. With loss of mature trees comes loss of habitat and food for wildlife, especially birds. I will never forget the first time I saw a Western Tanager. It was perched way up high in a mature tree in my yard. The Western Tanager is a brightly colored and beautiful bird that breeds in Western US and Canada. It winters in Mexico and Central America. This bird relies on mature trees for habitat and food. Without these mature trees, the birds will be most affected. As outlined in the profile of the Southcliff Neighborhood City Plan of January 22, 2001, the shape of this neighborhood is dictated by topography rather than public roads. The boundaries of this place are made up of steep bluffs, hence the name and one can only access it by 3 streets: Rhododendron, Manzanita, and Umatilla. It is a small neighborhood with minimal access. Commercial development and high rise apartments would, without a doubt, impact traffic, parking, safety, and the uniqueness of the place. People seek out this neighborhood to walk, exercise their dogs, and teach their children how to ride a bike because the streets are safe and quiet. There is great history associated with Southcliff. It is the southwest corner of McLoughlin Heights which is one of 6 housing developments brought on by the influx of population to Vancouver sparked by WWII and Kaiser shipyards. Even back in 1945, when WWII ended, residents expressed concerns that the land of the housing developments would be released, willy-nilly, to private investors. Their concerns were warranted because it would spell disaster to real estate values for private home owners in Vancouver. I am one of 10 children who was fortunate enough to go to college and earn a degree. My parents could not afford to pay for my college or help me buy a home. But, they taught me values such as working hard and earning my way. My husband and I are wage earners. We worked hard in order to pay for our home in Southcliff. I often worked two jobs. David and I are concerned that the mixed use plans have little regard for the small home owners whose life saving may be at stake. Do we want future generations to have an opportunity to purchase a home in and live in Southcliff? The answer is yes. But a home located adjacent to mixed use, combination housing, and commercial businesses in Southcliff is not what my husband and I currently have. We want to ensure future home owners of our property have the opportunity to buy it, as is, in the neighborhood as it currently is without tall apartment buildings and commercial influence. There are plenty of other locations to consider for housing development projects in and around Vancouver. It seems there is potential for developing the vacant lots near Winco on Andresen Road. There are Vacant lots along NE Vancouver Mall Drive. Perhaps better use could be made of the 23.22 acres that consists of Forth Plain Center. Maybe a deal could be arranged with Living Hope Church on Andresen Road for a mixed-use neighborhood. The old	

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	Tower Mall development is already underway. The City of Vancouver discontinued lease of the land for Vanco Golf Range for a Heights District Development project. Other golf courses such as Lakeview Par 3 Golf Challenge, The Cedars on Salmon Creek, and Hartwood in Brush Prairie are already being developed. Maybe sights could be set on Royal Oaks Golf Club for a housing development. I dare to wonder how the members of Royal Oaks would react to that type of plan. I dare even more to think of their reaction to plans for mixed-use housing in their very own neighborhoods. David and I feel blessed to have been able to buy our home in Southcliff and as such, we are stewards of this property and the neighborhood as a whole. We would not have chosen to move to Vancouver if there was no opportunity to buy a home in a neighborhood like we currently have. As honest stewards of Southcliff, we oppose the proposed comprehensive zoning plan. Sincerely, Bridget Marick & David Curran "	
AO	"This letter is from Steve and Jo Marie Hansen. We live in the Southcliff area of Vancouver Heights. We moved into our home on Rhododendron Drive exactly 40 years ago this month and have raised our 4 children here in this very safe and friendly neighborhood. We are only the 2nd owners of this home, built in 1954 where the original owners lived 30 years and also raised their 4 children. It is a very stable area with a mix of young families and older folks like us. There is not a lot of turnover as people want to stay here because of it's stability and friendliness where generations mix and help each other out. We are writing to oppose both Alternative 1 and 2 in the City of Vancouver's Comprehensive Plan Update 2045. These alternatives would allow Mixed-Use rezoning along East Mill Plain on the northern edge of Southcliff. This would allow both businesses and housing from 3 to 8 stories in elevation. There are only 3 entrance/exits into or out of our quiet neighborhood where we live, walk and play, and all are located along Mill Plain. Where would additional business patrons and apartment dwellers park? It seems like the only space could be into our existing residential streets in front of our homes. This would drastically affect our neighborhood and the environment that makes it a very desirable place to live and raise a family. It feels like it would be changing a neighborhood that is working well into one that isn't. Southcliff will already be impacted a lot in terms of street use and noise and business from from the Heights Redevelopment Plan which is adjacent to our neighborhood and soon to be getting underway. We ask you to please reconsider asking Southcliff to be rezoned along Mill Plain corridor within our neighborhood boundaries. Aside from the basic livability issues mentioned above, other significant reasons we oppose this rezoning are several. One regards the Tree Canopy and the environmental impact of increased development on their removal. Our neighborhood has been working hard to follow the City of Vancouver's lead in maintaining and protecting a large tree canopy. Southcliff is filled with Douglas Fir and Oak Trees that are very mature and healthy. Our lot has 16 Firs that are at least 80 feet tall and several White Oaks that are enormous. Most other lots are also filled with mature trees. No one in Southcliff takes down a mature tree without City permission and for good reason. In order to build businesses or multilevel living along Mill Plain, there would be wholesale removal of many of those trees. along the perimeter. The same removal of trees in the interior lots would be necessary if multiple dwellings were infilled. The character of our neighborhood which is held up as a model image of a healthy neighborhood would totally change. Many of us haven't until recently even needed air conditioning because our trees kept us cool enough. In the Environmental Impact Statement (EIS) regarding this change of zoning it's clearly stated that both alternative 1 and 2 of the rezoning proposals are predicted to have significant impacts on our neighborhood by increasing traffic count, increasing noise pollution, increasing water runoff because of more impervious hard surfaces and decreasing air quality. Not one of these effects is desirable in any neighborhood and the number of housing units and business that would contribute to Vancouver's future need would be a drop in the bucket compared to what it does to a very safe and successful neighborhood.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Southcliff has had Restrictive Covenants in place since it was developed in the 1950's. Every neighbor signs off on these and agrees to follow them upon purchase of their lot. These rezoning parameters are all well outside what we agreed upon in our purchases. Thank you for listening to our concerns. We ask you to please deny this zoning change. Jo Marie and Steve Hansen [address]"	
AP	"Vancouver2045 Committee, My name is Susan Nellor. My address is [address], Vancouver, Wa. 98661. I have lived in the Southcliff Neighborhood since 1987. The changes proposed in the Vancouver 2045 Plan are totally opposite to the livability of Southcliff Neighborhood. I hope your committee will reconsider. Our neighborhood is a special place, people wait to move into Southcliff. Please do not ruin our peaceful way of life with increased on street parking, increased traffic and potential increase of crime and vandalism. Our neighborhood will already be affected by the Heights Development project, providing that the City can find a developer who will build it. Developers, by not moving forward with construction, have given the City the message that adding a high density lifestyle is not conducive to our part of town. Please look at other areas for your development plans. Regards, Susan Nellor, resident of Vancouver since 1965 and resident of Southcliff since 1987 ""Vancouver2045 Committee, My name is Susan Nellor. My address is [address], Vancouver, Wa. 98661. I have lived in the Southcliff Neighborhood since 1987. The changes proposed in the Vancouver 2045 Plan are totally opposite to the livability of Southcliff Neighborhood. I hope your committee will reconsider. Our neighborhood is a special place, people wait to move into Southcliff. Please do not ruin our peaceful way of life with increased on street parking, increased traffic and potential increase of crime and vandalism. Our neighborhood will already be affected by the Heights Development project, providing that the City can find a developer who will build it. Developers, by not moving forward with construction, have given the City the message that adding a high density lifestyle is not conducive to our part of town. Please look at other areas for your development plans. Regards, Susan Nellor, resident of Vancouver since 1965 and resident of Southcliff since 1987 """	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AQ	"We are Con and Carol Kelleher and we have lived at [address] in the SouthCliff neighborhood for 50 years. We have reviewed the zoning change proposals being put forth in the City's Draft EIS and are strongly against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Our reasons for opposing these alternatives are: Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. Adding commercial and mixed-use to our neighborhood would mean construction of many multi-story buildings and cause major parking problems and congestion in the entire neighborhood. This would completely destroy livability in Southcliff and cause a drop in our property values. We understood that the Heights District redevelopment was to be where commercial and mixed-use hi-rise buildings would be built. If the City needs more density, add it to the Heights plan and not to Southcliff."	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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AR	"August 24, 2025 My name is Shannon Soriano and I live at [address] in the Southcliff neighborhood. I have reviewed the zoning change proposals put forth in the City's Draft EIS, I AM AGAINST OF BOTH ALTERNATIVE 1 AND ALTERNATIVE 2 AS CURRENTLY PROPOSED. My reasons for opposing these alternatives echo all the same reasons included in every single letter you've been receiving whether it be from losing so many mature trees and the habitat they provide for wildlife from the congestion on these streets it would cause for pedestrians and cyclists. I moved into this neighborhood for my forever home with my husband, we chose this area because of the historical, quiet, walkable streets, and how private and peaceful it and has remained throughout all the growth around it. Southcliff is one of the pillars of this community in its long-standing time here, its history, and its well-respected existence in Vancouver. Everyone recognizes its name, they know of it, and they know where it's located, many people still drive to the neighborhood, park their cars here just to walk through it. Some additional information I think should be highly considered is that on the corner of Rhododendron and Mill Plain specifically where the light is. Since I've lived here in the 5 years alone, I've witnessed probably 10 accidents, one in particular, a drunk female drove at a high rate of speed THROUGH our 6' cinder block fence... I thought adding the vine bus stop there was a TERRIBLE idea for that reason due to the number of accidents on file... to add a stop with pedestrians putting them at risk like that at the top of hill on a corner... terrible, terrible planning!!!!!!!!!! Weren't there any risk assessment done on that...??? Now you're talking about adding massive retail space and apartment living as well. People treat Mill Plain, especially this particular section like a speedway, flying up or down the hill around the corner and hitting it on the other side no matter which way they're going... What would be nice to have installed somewhere up here is a photo radar, speed camera. Thank you, Shannon M Soriano "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AS	"Jay Crary [address] Vancouver, WA. 98661 [email address] August 23, 2025 To the Members of the Planning Commission, I am writing to respectfully oppose the proposed rezoning of the Southcliff neighborhood. As a homeowner here since 1999, I have witnessed firsthand the strong commitment our residents have made to preserving the character, safety, and vitality of this community. I have lived in this area since 1967, having gone to Marshall Elementary, Mac Junior High and Fort Vancouver High School. My own children, who are adults now, similarly went to local Vancouver public schools. We are all committed to this area and have tried to contribute positively toVancouver in general and the Heights in particular. The proposed rezoning raises several serious concerns: 1. Traffic and Safety: The plan will inevitably increase traffic in and around Southcliff. Our streets were not designed for such volume, and there is no easy or appropriate access to the proposed site. Increased congestion would diminish the peace and quiet that families have long valued here.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	2. Availability of Better Alternatives: There are already more suitable sites nearby that are properly zoned for this type of development. Specifically, the south side of Mill Plain between Andersen and the cemetery offers far better access and infrastructure, minimizing disruption to established neighborhoods. 3. Conflict with Ongoing Development: The old Tower Mall property is currently under redevelopment, with plans that will bring much-needed services and growth to the area. Introducing another major project so close by would jeopardize the success of that effort and scatter resources and attention prematurely. A measured approach would allow the Tower Mall project to be built out first, after which other options could be considered. 4. Preservation of a Cohesive Neighborhood: Southcliff is more than just a collection of houses—it is a vibrant, engaged, and cohesive community that has been the backbone of this area for generations. Our neighborhood deserves to be protected from rezoning proposals that would erode its character and quality of life. For these reasons, I urge the Commission to reject this rezoning proposal. Growth and development are important, but they must be pursued thoughtfully, with respect for existing neighborhoods and careful attention to long-term planning. Thank you for your consideration. Respectfully, Jay L. Crary Southcliff Homeowner since 1999 Sent from my iPad"	
AT	"August 24, 2025 From: Kristin Abell and Vaughna Cochenour [address] Vancouver, WA 98661 To: The Honorable Mayor and City Councilmembers City of Vancouver Planning Department P.O. Box 1995 Vancouver, WA 98668 Subject: Public Comment in Opposition to Proposed Zoning in Southcliff – ""OUR VANCOUVER Comprehensive Plan Update"" Dear Mayor McEnerny-Ogle, City Councilmembers, and Planning Department Staff: We are writing as residents of the Southcliff neighborhood to express our strong and formal opposition to the proposed Mixed-Use and Medium-Scale Neighborhood designations applied to our community in both Alternatives 1 and 2 of the ""OUR VANCOUVER Comprehensive Plan Update."" While we understand the City's obligation under the Washington State Growth Management Act (GMA) to plan for at least 38,129 new housing units and 43,198 new jobs by 2045, this growth must be achieved in a manner that is responsible, functional, and respects the established legal, historical, and environmental character of existing neighborhoods. Our opposition is not an arbitrary rejection of growth; rather, it is a well-founded position informed by the city's own Draft Environmental Impact Statement (EIS), our city-recognized 2001 Southcliff Neighborhood Action Plan, official historical reports on the area, and the legally binding restrictive covenants that define our community. The proposed	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	high-density overlays for Southcliff are fundamentally incompatible with our neighborhood's design, infrastructure, and legal foundation. 1. Direct Conflict with Historical Significance and Legal Covenants Southcliff is not just a collection of houses; it is a historically significant example of post-war, mid-century modern residential development. The ""Clark County: Mid-Century Development (1950-1965)"" report, commissioned to encourage the preservation of this era's heritage, identifies Southcliff as the first subdivision developed during the pivotal redevelopment of McLoughlin Heights. This historical character is protected by legally binding restrictive covenants that have been in place since 1954 and were signed by the city's Mayor at the time, potentially making the city a party to the covenants. These covenants run with the land, apply to all properties, are automatically extended and are enforceable by residents. Any attempt by a property owner to develop a multi-story, multi-unit structure as allowed under the proposed Mixed-Use or Medium-Scale designations would be a direct violation and would face immediate legal challenges from the community. Furthermore, our 2001 Neighborhood Action Plan, created in partnership with the City, formallyestablished the objective ""To ensure that single family residential re-construction is consistent with the architecture of the neighborhood"" and includes a high-priority action to ""Maintain the current amount of single family homes in the neighborhood." The proposed upzoning directly contradicts this long-standing, city-recognized community vision. 2. Severe and Unmitigable Traffic and Safety Impacts The proposed overlays are functionally unworkable and create a significant public safety issue. No new ingress or egress is proposed from Mill Plain Blvd., so all associated traffic would be funneled onto Southcliff's quiet, residential streets. These curvilinear streets were intentionally designed to reduce traffic speeds and never were intended to serve as collectors for high-density housing. Our 2001 Action Plan already identified traffic calming as a high-priority issue. The city's own Draft EIS confirms this concern, projecting ""higher projected new traffic volumes on city safety corridors"" under Alternatives 1 and 2. This will inevitably lead to severe parking saturation and endanger the many residents, including children and seniors, who walk and cycle on our streets. We walk our neighborhood every day, so do many others including Southcliff neighbors and people from the surrounding area. There are no sidewalks in Southcliff, so increasing the traffic and parking will take away one of the best features of the neighborhood. 3. Environmental Degradation Confirmed by the City's Draft EIS The proposed upzoning would cause irreversible environmental harm, a fact supported by the city's own analysis. Stormwater System Overload: The Draft EIS acknowledges that Alternatives 1 and 2 have a ""higher potential for new impervious surfaces and associated runoff". This new runoff would overwhelm the recently completed $2.3 million Blandford Basin Stormwater Project, rendering a major public investment meant to protect the Blandford Canyon watershed and Columbia River inadequate before it has even had a chance to fully function. Destruction of Tree Canopy: Southcliff possesses a 47% tree canopy cover, the highest of any neighborhood and a critical component of Vancouver's 36-year ""Tree City USA"" status. The scale of development required for Mixed-Use and Medium-Scale housing would decimate this vital urban forest. The Draft EIS confirms that both alternatives have a ""higher potential for impacts to vegetation and habitat areas"". Furthermore, Southcliff's tree canopy is vital habitat to several protected bird species we've witnessed in the neighborhood since moving here including bald eagles, red tailed hawk, and peregrine falcon. 4. Incompatibility with the Adopted Heights District Plan Southcliff residents participated in the planning for the adjacent Heights District, accepting the significant density and impact of that major redevelopment. That plan capped building heights at 80 feet (six stories). Inexplicably, the proposed Mixed-Use designation for our single-family neighborhood allows for buildings up to 110 feet (eight stories)—substantially taller than the maximum height permitted in the core of the high-density Heights District. This	

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	is illogical and competes with the city's plan to make the Heights a Regional Activity Center. Commercial development in Southcliff would compete with and detract from commercial activity in the Heights. The city should focus commercial and high-density housing zoning in the Heights, where the infrastructure exists to support it. Conclusion and Formal Recommendations We are not opposed to Vancouver's growth, but we hope it will be implemented thoughtfully. The application of Mixed-Use and Medium-Scale zoning to Southcliff is contrary to sound public planning, is environmentally irresponsible, and disregards the neighborhood's legal and historical foundations. We formally request that the City Council and Planning Department take the following actions: 1. Completely remove the Mixed-Use and Medium-Scale Neighborhood designations from all parcels within the Southcliff neighborhood in the final version of the Comprehensive Plan and associated zoning maps. 2. Focus the highest-density Mixed-Use and Medium-Scale developments within established urban centers, such as the Heights District, that are already equipped for such scale. This aligns with the city's goal to ""promote efficient land use by focusing new development in areas with existing infrastructure"". 3. Mandate contextual downzoning and strict transitional height limits for any parcels bordering established single-family neighborhoods like Southcliff. This would require ""step-down provisions"" that create a sensitive transition and ensure compatibility, which is a stated goal of the Comprehensive Plan. 4. Incentivize the redevelopment of existing underutilized commercial properties along major corridors before permitting new commercial development to encroach into neighborhoods. 5. Initiate a process to establish a Southcliff Mid-Century Modern Historic Overlay District to formally recognize and protect the unique architectural and historical character of our neighborhood, a goal that aligns with the city's stated objective to invest in historic preservation. Thank you for your time and consideration. We look forward to a collaborative approach that allows Vancouver to grow while preserving the unique communities that make it a special place to live. Sincerely, Kristin Abell and Vaughna Cochenour [email address] [phone number] [email address] [phone number]"	
AU	"""Please see the article in Science Advances volume 11, number 30, and perhaps you'll understand why it seems really ignorant that so much time has been wasted on providing this rezoning of our city. I'm specifically referring to the article on climate change and the coming freshwater crisis (Unprecedented continental drying, shrinking freshwater availability, and increasing land contributions to sea level rise). Unprecedented continental drying, shrinking freshwater availability, and... O When I mention our aquifer and our dependence on groundwater in this county, most people seem surprised to discover that this is the case here. What is the condition of our aquifer? How much groundwater is available for pumping into the future? These are questions that should be addressed in the DEIS. Rather than discussing how to increase recharge by retaining open space the Vancouver development people are considering densifying the city by increasing the number of housing units that can be built on land that is occupied by single-family neighborhoods, such as Southcliff. Additionally, there is a lack of discussion in the DEIS on the additional decrease in potential recharge by increasing impervious surfaces.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	It seems ludicrous to me that the DEIS does not have many factual data that can be compared to evaluate alternatives, and that the No-Action alternative is one that the State Legislature in its apparent lack of wisdom has applied to the entire State. Sincerely, Paul Pedone [address] [email address] [phone number] """	
AV	"""Hello, All. I have known most of you for many years and have worked with you on countless initiatives to make our city even more outstanding. I appreciate you taking the time to thoughtfully read my comments and consider the impacts I fear could negatively impact the Southcliff Neighborhood. First, I have carefully read the information shared about two alternatives for implementing two things...rezoning a strip along Mill Plain Blvd that backs up to our neighborhood..and the radical proposal to completely ignore long standing CCand Rs that have been in place since 1954. This historic mid-century modern neighborhood has been preserved as a treed, peaceful, well laid out community for families, kids learning to walk and ride a bike, pedestrians and pets. It is a friendly place. While without sidewalks, it is extremely safe and walkable. This morning, a neighbor who has lived here for 54 years chatted with me as he made his therapy walk. The idea that these two suggested changes could be forced upon us is offensive to me. Here's why: 1. I understand that Vancouver is faced with needing a great deal of new housing for an influx of new residents. Vancouver has done a great job of creating a city that is a wise choice for new residents. Three solutions (probably among others) come to mind and have been discussed for years: The Evergreen Corridor , Downtown Vancouver (see recent Columbian) and making sure that the Heights Plan is as dense as it can be. These options are already primed for execution. Let's focus on those. 2. The Heights project, many fear, will already bring additional traffic and negative impacts to our neighborhood. Do we really need to take another hit? 3. Finally, have you ever driven behind a strip mall or line up of businesses that keep their trash bins (unsightly and often smelly) """"in the back'? Where will operators park their cars? Adding new commercial space along Mill Plain will bring activity, random noise (we already know about traffic noise and we understand that). This will undoubtedly lower property values and create hardship for my neighbors. Additional retail space will already be provided in the Heights Plan. I see no need to add more. And, consumers have already become great online purchasers. 4. Finally, when it was time for my late husband and I to downsize 23 years ago, this was our top of list choice for a move. We bought a modest home on a quiet street. We felt that our next chapter was going to be 'as is' with the amenities we wanted (peace, quiet, safe, friendly, trees, mature landscaping, and much more...) because it was well defined and guaranteed by existing CCandRs. Please don't decide to move forward with the City"s Draft EIS. Southcliff is so much more than a developer's opportunity. It's my home. Respecfully, Lee Rafferty """	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
AW	"""My wife and I, 48 years married, purchased our forever home located at [address], Vancouver, WA 98661, in 2015. Part of the purchasing process included we had to agree to a COVENANT which mandated we maintain single family	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	dwelling status on the property itself. We have invested heavily into our home knowing this was our forever home, this was our last purchase; this was it for us. We intend to live here till the end. When deciding on our new home location, City of Vancouver, we never imagined in our wildest dreams this could happen. Both my wife and I are senior citizens over the age of 65. The very act of moving and relocation expenses would be both cost prohibitive and emotionally exhausting for us as. In addition, anytype of undo pressure put upon us to sell, or relocate would have a catastrophic impact on our quality of life. In addition, our property is currently zoned for SINGLE FAMILY RESIDENCE only. This zoning status gives rise to our property being valued at a financial premium. This is common knowledge here in the South Cliff Neighborhood. Any change to this zoning, WOULD IMPACT our property value significantly. My estimates are a decline of 50%. We do not consent to this rezoning. Thank you. Thank you Mark & Karen Streeter [address] Vancouver, Wa """	
AX	"In response to: OUR VANCOUVER Comprehensive Plan Update Draft Environmental Impact Statement How to Provide Comments Comments may be provided via online comment form, email, postal mail or voicemail. Online Comment Form (preferred): https://www.surveyhero.com/c/VancouverDEIS Email: OurVancouver2045@cityofvancouver.us Postal Mail: Meredith Herbst City Hall PO Box 1995 Vancouver, WA 98668 Voicemail: 360-487-7929 Dear Staff of OUR VANCOUVER Comprehensive Plan Update Draft Environmental Impact Statement: I am writing this letter as a representative of the partners of the Vancouver National Historic Reserve (VNHR), a nationally significant historic district and congressionally designated park largely within the southern portion of the City of Vancouver's Central Park. The VNHR was established by Congress in 1996 (Public Law 104-333, Sec. 502) and encompasses approximately 366 acres of public lands under the ownership and management of the Department of the Interior through the National Park Service (NPS) at Fort Vancouver National Historic Site (FOVA), and the City of Vancouver (COV). The VNHR partners, including NPS, COV, and the State of Washington (through the Department of Archaeology and Historic Preservation –DAHP), manage the VNHR through a publicly approved Cooperative Management Plan, with each agency partner managing its lands consistent with their respective laws, regulations, and policies. The shared vision of the VNHR is embodied in the preservation of historic structures and other cultural resources including archaeological sites and cultural landscapes; education and interpretation of the unique people and events that shaped the history of the region centered at the VNHR and including nearby historic properties, and public use and accessibility to the park and its cultural and natural resources. NPS is the lead for interpretation, research, and museum curation, cultural resource compliance and ensures that rehabilitation of historic structures and landscapes conform to the Secretary of the Interior's Standards and Guidelines for historic preservation. DAHP is responsible for	The City, as partner in Vancouver National Historic Reserve and significant property owner within the district, is committed to maintaining its historic character, structures, and archeological and cultural resources. The current Central Park Mixed Use (CPX) zoning district allows for a mix of uses including housing, offices and commercial services, educational and community recreation facilities, medical centers, human service facilities, cultural institutions, and parks and open space. The proposed new zoning districts are Institutional/Campus for areas south of Officers Row and north of McLoughlin Blvd., and Regional Activity Center in between these areas, including portions of Clark College and on both sides of Mill Plain Blvd. Both the Institutional/Campus and Regional Activity Center zoning districts allow for a similar mix of civic, institutional, housing and commercial uses as the existing CPX zoning and in alignment with City policies and goals associated with the Comprehensive Plan update. In recognition of the unique character, shared goals for preservation and additional state and federal limitations on development with the Vancouver National Historic Reserve, the new zoning code also applies a new Heritage Overlay Historic Reserve District (see proposed new Title 20 Development Code 20.550.070) that establishes standards beyond the base zoning to protect cultural and historic resources and the historic character of the Vancouver National Historic Reserve. This new overlay establishes boundaries, regulates uses, and provides for special standards that require consistency with the Washington State Historic Building Code, the US Secretary of the Interior's Standards for Treatment of Historic Properties, and other pertinent local, state and federal regulations. The area included in the new overlay includes the full geography of the current Officers Row and Historic Reserve conservation districts that currently exist in the Central Park Mixed Use (CPX) plan district and incorporates all standards from the current Historic Reserve conservation district. Additionally, properties located south of Mill Plain Boulevard and directly abutting Officers Row to the north, while proposed to be rezoned to Regional Activity Center to be consistent with the City's Preferred Alternative Framework and adjacent properties, are all currently in public ownership (Clark Public Utilities District, City of Vancouver, and Vancouver Public Schools) and are intended to stay that way for the foreseeable future based on conversation with representatives from those agencies. The Central Park Subarea Plan will continue to guide investment decisions in the subarea, and continues to be referenced in Vancouver Municipal Code Title 20 Development Code. Core principles of the subarea plan

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	identifying, evaluating, and protecting significant historic properties in the State of Washington that are worthy of protection, providing guidance and oversight on historic preservation within the VNHR. We agree that meticulous planning is critically important to facilitate smart growth and development for Vancouver, Washington, while maintaining those attributes of a proud and desirable community that reflect on its storied past and unique community assets. However, we are troubled by the plans to redesignate the Central Park Plan Mixed Use Zoning to Institutional/Campus that will allow townhouses, apartments, mixed-use residential, and mid-rise buildings within Central Park and VNHR in addition to the more appropriate educational, civic, and recreational buildings and facilities. Further, under Alternative 1, the zoning of a strip of the Central Park area as Mixed Use Neighborhood would split the Central Park into two separate areas separated by a broad swath along Mill Plain associated with a minimum housing density of 32 units/acre, no maximum density, building heights up to a maximum of 110 feet tall, and multifamily buildings. Alternative 2 is even more aggressive within this strip with zoning the same as for downtown (Regional Activity Center), with a minimum density of 64 units per acre, no maximum density, and minimum building heights of three stories with no maximum building heights. These zoning changes are not consistent with the character of the VNHR and adjoining properties and could result in significant adverse effects to the historic district including adversely affecting the setting and feel of the park which will impact the way in which the historical significance of the place is conveyed to the visitor. The City's Central Park Plan recognized the unique character of the former historic military post, including the VNHR, and the need to create a unified sense of place that celebrated the shared landscape, while recognizing historically significant grand entrances and roads and interconnecting trail networks which have existed through time. Importantly, the district adjoining the VNHR was dedicated to education and recreation centered on Clark College and Hudson's Bay High School and emphasizing an open campus, parklands, and recreational opportunities. Attributes of historic preservation, education and recreation associated with the Central Park Plan are fundamental to the quality of life of Vancouver, Washington and essential to promote a healthy and livable community. The VNHR and related properties of Central Park support recreational activities and park landscapes that support citizens' regular exposure to green space. The VNHR and Central Park are indispensable for citizens to foster well-being, reduce stress, increase creativity, engage in outdoor civic events, while being exposed to the grass, trees, and landscaping. This will be even more important for our residents who will be inhabiting increasingly densely packed areas. Absent the national park's historically significant and open green space, no large open green space of similar scale and historical importance exist, with the exception of Central Park—a place which is open and welcoming to the public. As the population and density of housing continues to increase, it is critical, just as other great cities have done, to set aside large swaths of open green space. Vancouver is incredibly fortunate to have existing—highly historically significant and open green space—which proudly ties to the City's and the PNW's history. Promoting and cultivating this open green space to better serve the people of Vancouver for generations to come appears prudent, forward thinking, and even visionary to offset the greater density of housing and population elsewhere in the city. We urge minimally, that zoning recognize three conservation districts intrinsic to the Central Park, Officers Row (20.640.030), Historic Reserve (20.640.040), and Education and Recreation (20.640.050). These existing conservation districts provide development standards and guidelines that are consistent with existing VNHR planning documents, deed restrictions and other covenants, and create a unified Central Park vision that will maintain and preserve, for the benefit of our citizens today and in the future, the unique nationally significant character of this portion of the City of Vancouver. Ultimately, the intact nationally significant resources providing opportunities for learning and reflection as well as the integral quality of life provided by open green space of the VNHR, including Officers Row and the national park) and Central Park sets our city apart from most other cities in our nation and is worthy of continued protection and preservation. We hope for forging a path which continues to preserve, what has been historically called, the heart of Vancouver. taf Tracy A. Fortmann	include preserving and enhancing the Historic Reserve as well as institutions and community resources adjacent to it; implementing Gateways to differentiate Central Park from other areas of the City and recognize its unique character and history; building out the Great Street concept as roadways in Central Park are improved; establishing multimodal pathways with consistent wayfinding; preserving the abundance of open space in the subarea; and ensuring it is well served by transit. Throughout the City, proposed changes to the zoning code do not diminish or eliminate the goals in adopted subarea plans; instead, the proposed new zoning code will utilize a new set of land use regulations to implement subarea visions and goals. This is true within Central Park as well as the rest of the City.

ID	Full comment	Response
	Superintendent Fort Vancouver National Historic Site National Park Service [address] Vancouver, WA 98661 (w) [phone number], (c) [phone number] Team FOVA In Box"	
AY	"Dear Ms. Herbst, 1. Regarding the Our Vancouver comprehensive plan update, please record our comments and forward them to all appropriate decision makers. Our names are William and Debra Craine. We have lived at [address] in the Southcliff neighborhood since 2002. 2. We have reviewed the zoning change proposals being put forth in the City's Draft EIS. 3. We strongly support a ""No Action"" alternative with whatever zoning features would best preserve the historic character of our neighborhood. While we understand that some changes may be required by State mandates, we urge those changes be kept to a minimum. 4. Because our property backs Mill Plain Blvd, we are among those owners who would be most severely affected by zoning changes. Our reasoning against the ""Action Alternatives"" include: a. Both Alternate 1 and 2 are incompatible with established long term planning. When we returned to the area in 2002, following a military career, we paid particular attention to existing and proposed land use standards. The Southcliff restrictive covenants (dating to 1954) and the 2001 Neighborhood Action Plan both mandate single-family residential use with building heights restricted to two stories. All the properties have off street parking. Our purchase was based on an expectation the look and feel of the community we were joining would be preserved into the future. The action alternatives could replace our exiting adjacent neighbors with commercial and mixed use buildings up to 8 stories high. I don't see provisions for off street parking. Those changes would fundamentally alter the character and value of our property. b. The action alternatives either disregard or dramatically expand the impacts of the Tower Mall (Heights district) redevelopment. Southcliff is immediately adjacent to that property which is already being redeveloped with commercial and mixed use high rises. The lack of required parking is already expected to spill traffic congestion from there into our neighborhood. I believe Injecting higher density into both locations will make parking impossible. If higher density is required, it should be concentrated at Tower Mall while addressing adequate parking there. c. Southcliff is a historic mid-century neighborhood that should be preserved. The quiet streets and mature tree canopy provide a healthy and safe environment for both children and retirees to get exercise and connect with neighbors. With adjoining undevelopable land, Southcliff is a haven for wildlife. We have friends in Washington and other states where the real estate trends are toward gated communities designed to mimic the look and feel of what exists in Southcliff. We are not gated and welcome visitors to our streets and park. I don't believe allowing higher density zoning to destroy the character and historic identity of Southcliff will actually concentrate land use. It will simply remove green space in Vancouver while shifting low density development to less diverse and more affluent communities. d. In essence, the proposed rezoning is a taking of our assets. Our present quality of life is an asset that significant rezoning would devalue. Our privacy is an asset that the placement of an eight story building on a nearby or adjacent lot would destroy. Our home is a financial asset the changed character of the neighborhood would deflate. The	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	personal costs of either action alternative are an unreasonable burden to place on people who are already accommodating high density redevelopment on bordering property. 5. Thank you for the opportunity to comment. We again urge you to pursue plans that focus on renewal and development of existing commercial and mixed use zoned properties along Mill Plain Blvd. Southcliff is a small pocket of land with an established community. It is not in the interest of our neighbors or Vancouver at large to discard decades of community planning in favor of a drastically different vision. "	
AZ	"Chad & Rebecca, Thank you for the opportunity to provide comment on the Draft Environmental Impact Statement (DEIS) for the Vancouver 2045 Comprehensive Plan Update. We commend the City for embracing the complexity of growth and change while continuing to engage the community in shaping a shared future. The DEIS and supporting materials reflect thorough, thoughtful, innovative planning and an earnest commitment to sustainable and inclusive urban development. As the City evaluates land use alternatives, we urge special consideration for Columbia Business Center (CBC). Since the mid 20th century CBC has been a significant economic asset in our region supporting a unique, maritime-dependent industrial ecosystem built upon the legacy of the Kaiser Shipyards and enhanced by decades of reinvestment. Comprised of 228 acres and including more than 1 mile of Columbia River shoreline, it plays a distinct role in the regional economy, providing middle wage, traded sector jobs that are increasingly scarce in urbanizing environments. Since 2006 Killian Pacific has been a steward of this site, and in 2024 purchased the westerly 129 acres, consolidating the full property under unified private ownership for the first time in generations1 Today the CBC is home to more than 2,000 jobs with an average annual wage of approximately $95,000 and contributes an estimated $2 billion in economic impact to our region2 Request Killian Pacific is seeking a change of CBC from its current designations of light industrial (west of Kaiser) and heavy industrial (east of Kaiser) to a Regional Activity Center (RAC) designation for entirety of the site, as reflected in DEIS Alternative 23. Killian Pacific recognizes that, ultimately, the City will adopt a plan that is a combination of the Alternatives included in the DEIS, and that takes into account feedback on the DEIS, additional analysis and ongoing community engagement. We urge you to designate CBC as RAC in the final recommended land use map that emerges from this work. General Comments In general, DEIS Alternative 2 includes capacity for both job creation and housing production that slightly exceed the growth targets established for the City of Vancouver. This marginal capacity above the jobs and housing targets would provide a greater flexibility in achieving goals included in draft planning documents through the inevitable economic and market fluctuations that will occur over the 20-year planning horizon. This would be a strategic advantage for the City as it seeks to both continue to support job creation as well as encourage investments that address Vancouver's crucial housing deficit. As such, KP encourages the City to consider maintaining some version of this marginal capacity in the final land use plan designations. Built Environment The current developed condition of CBC is as unique as its size, location and connection to the Columbia River. The western portion of the site (between Columbia Shores and Kaiser Avenue), while active with a range of tenant activities, is relatively underdeveloped and contains more aged structures. The central portion of the site (between Kaiser Avenue and Victory Avenue) is more intensely developed with a mix of shipyard-legacy and newer industrial buildings and active use of outdoor areas for heavy manufacturing storage and assembly. The eastern-most portion of the site (between Victory Avenue and Marine Park) is the most intensely and recently developed, with a mix of manufacturing, warehousing and distribution facilities. For long range planning purposes, a RAC designation is being sought for the entire site with this plan update. However, the nature of these existing development patterns and	Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The proposed Preferred Alternative land use map applies Regional Activity Center zoning to the area known as Columbia Business Center in recognition of future plans to evolve this area into urban mixed use center. The proposed Preferred Alternative and Vancouver Municipal Code Title 20 Development Code simultaneously apply an Industrial Holding overlay on the same area in order to preserve the current industrial functions and allow for continued legal use and expansion of industrial users until such time that transition to a different development pattern is appropriate. The Industrial Holding overlay is applied in recognition of areas economic contributions and ensures they remain viable and successful at this site. The Industrial Holding designation will remain in place until development and adoption of a comprehensive and likely phased mixed use master plan for the site that addresses future uses, critical infrastructure needs, community space, environmental conditions and phased redevelopment.

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	active industrial ecosystem suggests that a full build out of the site will not occur within the horizon this comprehensive plan (2045) but rather take decades and be informed by the natural life cycle of tenant businesses. Redevelopment under the RAC designation would facilitate long-term potential for increased job creation, economic diversification and resilience, and a net increase in total economic output from CBC while respecting the unique maritime manufacturing uses on site. Through thoughtful master planning in partnership with the City, future development of CBC can enhance pathways to quality jobs, strengthen support for small businesses, create opportunities for innovation and entrepreneurship and stimulate invest in neighborhoods and commercial districts. Based on the planning assumptions underlying the analysis contained in the DEIS, a disciplined, measured, market sensitive conversion of CBC from its current state to regional activity center within the planning horizon could result in creation of significant new direct, middle wage jobs in addition to the existing jobs on site5 In addition, master planning of CBC under a RAC designation would facilitate the potential development of additional housing to address Vancouver's housing crisis without material displacement of existing jobs. The potential development of CBC consistent with a RAC designation also presents significant opportunities to enhance, restore the ecology of, and expand public access to the Columbia River shoreline6. Such potential development would also present the opportunity for improved community aesthetics and placemaking7 aligned with Vancouver's community vision. Development of the site under RAC would necessitate significant investment in the full spectrum of public infrastructure. Current transportation access to the site is limited, and investments in utilities, power, transportation, water quality, parks and open space will all be needed to serve further development of the site. As with all alternatives in the DEIS, further development over time would also increase demand for public services, requiring plans for incremental expansion of public safety, education, and recreation services8 Mitigation Killian Pacific sees the potential for CBC to serve as an even more significant part of the region's economy and vibrancy, while concurrently recognizing the importance of the current industrial ecosystem and the unique maritime-reliant manufacturing that distinguishes this property. CBC is unique in the City of Vancouver. Its legacy rooted in the Kaiser Shipyards makes it an exceptional industrial asset in our region. Additionally, the DEIS accurately identifies the practical challenges associated with further development - including limitations in transportation access and capacity, limitations on power and utility infrastructure, and increased demand for public services. To realize the full potential of the site would require significant investments in the full spectrum of public infrastructure and incremental expansions of public services. To balance the preservation of the existing industrial ecosystem at CBC with planning for the longterm potential for future urban development, we propose a mitigation framework that can be embedded in the Comprehensive Plan and its implementing actions. While we will seek to collaborate with the city in crafting the specifics, we recommend this framework include: 1. A base land use designation of Regional Activity Center: this would embed a vision for the ultimate evolution of CBC to a more dense, compact, mixed-use development that maintains existing and maximizes future employment, residential and open space opportunities. This change in the base land use designation would allow KP to invest in the creation of a master plan with the City during the horizon of this comprehensive plan. 2. An Industrial Overlay Zone (or equivalent): This overlay should be adopted concurrently with a base RAC designation and preserve CBC's current industrial function, allowing for the continued legal use, expansion, and evolution of industrial operations without classifying them as nonconforming. This approach ensures that the site's economic contributions remain viable during master planning and subsequent development and reassures current industrial businesses of their ability to remain successful at the site. 3. A master plan requirement as a prerequisite for RAC-based redevelopment: Releasing the industrial holding overlay should be contingent upon the adoption of a comprehensive master plan for the district9. This plan would be created in partnership with the City and would address job and housing needs, infrastructure needs, park and open space plans, transportation solutions, environmental conditions, and phasing.	

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	4. Integration into Capital and Public Service Planning: Ensure that public investments in infrastructure and transportation necessary to support urban redevelopment are aligned with both the timing and geography of private investment readiness. We believe this can be done in anticipation of and concurrent with collaborative master planning. As a long-term steward of this site and a multi-generational developer in our region, Killian Pacific is committed to both optimizing the current industrial ecosystem located on CBC while planning for a vibrant, evolving future for the site. We believe this approach is an exceptional opportunity to maintain the integrity of Vancouver's remaining industrial base while enabling a thoughtfully managed transition over time. Thank you for your leadership and for considering these comments in your continued work on the Comprehensive Plan Update. We look forward to actively working with you as the remaining policy work is matured, through adoption of the plan rewrite and the implementation state beyond. If you have any questions, please do not hesitate to contact me. "	
BA	"Dear Vancouver City Council Members, I am writing to respectfully oppose the proposed rezoning of the Southcliff neighborhood. As a homeowner here since 1999, I have witnessed firsthand the strong commitment our residents have made to preserving the character, safety, and vitality of this community. I have lived in this area since 1967, having gone to Marshall Elementary, Mac Junior High and Fort Vancouver High School. My own children, who are adults now, similarly went to local Vancouver public schools. We are all committed to this area and have tried to contribute positively to Vancouver in general and the Heights in particular. The proposed rezoning raises several serious concerns: 1. Traffic and Safety: The plan will inevitably increase traffic in and around Southcliff. Our streets were not designed for such volume, and there is no easy or appropriate access to the proposed site. Increased congestion would diminish the peace and quiet that families have long valued here. 2. Availability of Better Alternatives: There are already more suitable sites nearby that are properly zoned for this type of development. Specifically, the south side of Mill Plain between Andersen and the cemetery offers far better access and infrastructure, minimizing disruption to established neighborhoods. You don't often get email from [email address]. Learn why this is important 2 3. Conflict with Ongoing Development: The old Tower Mall property is currently under redevelopment, with plans that will bring much-needed services and growth to the area. Introducing another major project so close by would jeopardize the success of that effort and scatter resources and attention prematurely. A measured approach would allow the Tower Mall project to be built out first, after which other options could be considered. 4. Preservation of a Cohesive Neighborhood: Southcliff is more than just a collection of houses—it is a vibrant, engaged, and cohesive community that has been the backbone of this area for generations. Our neighborhood deserves to be protected from rezoning proposals that would erode its character and quality of life. For these reasons, I urge the Commission to reject this rezoning proposal. Growth and development are important, but they must be pursued thoughtfully, with respect for existing neighborhoods and careful attention to long-term planning. Thank you for your consideration. Respectfully, Jay L. Crary Southcliff Homeowner since 1999 "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
BB	"""We have lived in Southcliff for 40 years, as have many of our neighbors. We chose this neighborhood for the beauty of the homes here, it's large lots and wide walkable streets. Being a small confined neighborhood gave us a feeling of safety and security, knowing that we would make this your lifetime home. This old historic neighborhood is one of this city's gems. City's in which we have visited in the U.S usually include several of these neighborhoods where the homes are higher end homes where the structures and landscapes have been upgraded and maintained over the years, making them unique and special neighborhoods within these cities. The proposed plans for the land management in the Southcliff area would significantly alter this unique and historic neighborhood. The large buildings proposed to line Mill Plain in our neighborhood would drastically alter the character for the residents who have moved to Southcliff over the years. Many of us have remodeled and upgraded our landscaping over the years to ensure that Southcliff remained the little gem that it is. Our once peaceful gem of a historic neighborhood would no longer exist. After reviewing the Southcliff Neighborhood Action Plan dated January 22, 2001 a few specifics stand out to us: 1. 2. 3. Support improvements for bicycling 4. (bike lanes, paths, and parking). 5. 6. 7. 8. Maintain the current amount of single 9. family homes in the neighborhood. 10. It is our understanding that from the Southclif Action Plan and the restrictive covenants from our > 60 year neighborhood charter (CC and R's) limit extra construction on our personal property lots, thereby ensuring that our neighborhood keep its lonstanding character and importance to the City of Vancouver. We have not recently reviewed the proposed new development of Town Plaza. Our understanding is that this plan will include housing for some 1300 people, allowing for new commercial development and other improvements which seem to satisfy many of the goals of this plan. We are already concerned with our safety in Southcliff due to the high influx of individuals who will newly reside nearby in the Town Plaza development. It is our view that the city keep this little neighborhood gem as it now exists for future generations to live in and enjoy, as it gives the City of Vancouver a sense of it's history. Thank you for allowing our input Rose and Terry Williams [address] """	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
BC	"To Whom It May Concern: I am writing to state my extreme safety concerns with your current zone R-6. Current buyer on the vacant lots is planning on putting high density condos on a neighborhood street , Esther Street off 49th NW. This neighborhood has a narrow street, sub-standard road width, no sidewalks, poor lightening, poor sight distances some intersections, two schools that have much walking traffic, poor drainage (rain runs down my driveway much and floods drains much making it so unsafe not safe for current traffic). Also, on the corner of 49th/Franklin house who have renters that have	Comment noted. The Preferred Alternative zones this area at Esther Street and 49th and 49th and Franklin as Medium Scale Neighborhood. Refer to Common Response #5 Traffic Safety for more information on this topic and Common Response #11 for details on Property Value and Taxes.

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	a parking lot of cars parked in their field. They often drive out from field on to Esther Street (you can see the tire dirt path next to blackberries bushes super unsafe); as well as members living in house or area being under investigation of burglary of the Archdiocese of Seattle house now owned by buyer wanting to put many condos on small piece of property. Condos don't fix the large housing with large lots to north of property under zone R6 in question. Please stop this destructive process that will make this neighborhood very unsafe as well as lowering value of homes. Teri Moyer [address] 3609365767"	
BD	"Meredith Herbst City of Vancouver City Hall PO Box 1995 Vancouver, WA 98668 Email: OurVancouver2045@cityofvancouver.us(External link). Dear Meredith Herbst: Thank you for the opportunity to comment on the City of Vancouver's July 2025 Our Vancouver: Our Future 2045 State Environmental Policy Act Draft Environmental Impact Statement. This plan will establish a vision to guide the growth and development of the City of Vancouver over the next 20 years (to 2045). Planning for the future of the City of Vancouver should recognize those important characteristics of the city that bring people to want to live here. One important aspect is its placement within the amazing natural beauty and resources of the Pacific Northwest, including the Columbia River, the evergreen-clad hills and mountains, and the magnificent volcanoes that are visible throughout the city. In addition, Vancouver's unique and very special history is a particular reason why new residents and visitors are drawn to this place. It's not just the National Park Service's Fort Vancouver National Historic Site, and the City of Vancouver's Officer's Row, the Howard House, and other properties of the Vancouver National Historic Reserve, but also the historic neighborhoods that have developed in response to the nationally-significant events that have occurred here and that are important character-defining parts of our city. Many of our most historic neighborhoods are linked to Hudson's Bay Company and U.S. Army history, like the names of our principal thoroughfares (Mill Plain, Fourth Plain, McLoughlin, Chkalov, and McArthur). Besides the Hough Neighborhood and the Vancouver National Historic Reserve, many of these neighborhoods reflect uniquely Vancouver character and retain a valuable historical aesthetic and setting. Many are worth preserving and listing on local, state, or national historic registers. Some neighborhoods were intentionally created with the goal to preserve the character of their setting. For example, Officers Row is deed-restricted to maintain the historic character of the buildings and landscape. The covenant for Southcliff (where I live) created in the early 1950s, define the number and size of houses that can be placed on each lot. These past decisions have led to distinctive and highly-valued neighborhoods. There are other neighborhoods that are distinctive because they date to a particular time period, reflect important historic events in the history of the city, and retain a character that is distinguishing. For example, Harney Heights contains many streets, houses, and facilities that reflect the character of the World War II housing for shipyard workers who supported the war effort and stayed in Vancouver after the war to make a good life. Both alternatives as described do not address the level of damage that could be done to these historic places and neighborhoods. Many of the zones create circumstances that conflict with the special protective deed restrictions and covenants that were placed on them by forward-looking citizens and governments. Zoning in both alternatives for Southcliff, for example, would create situations that vary dramatically from its covenant. The identification of urban mixed-use development along Mill Plain on the northern edge of Southcliff and southern edge of Harney Heights neighborhoods could lead to construction that would devastate both neighborhoods with potential for 110 ft. tall buildings and extremely high minimum housing densities. The traffic impacts alone associated with this zoning on the	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	adjacent properties would be extremely disadvantageous. Even the base level of low-scale zoning would allow three-story building heights (45 ft.) and six units per lot. These zoning decisions would turn once cohesive neighborhoods into muddled, fractured, and disintegrated districts. Central Park is another area of tremendous concern as this represents one of the best ideas of the City of Vancouver. Zoning for Central Park would be inconsistent with maintaining a reflective and peaceful campus of inter-related parks and grounds dedicated to historic preservation in the south and education (Clark College and Hudson's Bay Highschool) and medicine (VA) in the north. The introduction of townhouses, apartments, mixed-use residential, and mid-rise buildings are not consistent with the existing character of Central Park, particularly if they are not related to the goals of maintaining a cohesive park-like setting and the specific functions of the institutions that are situated within them. Likewise, it is imperative that the northern and southern portions of Central Park are unified and not divided by high-density residential housing and commercial businesses. With greater housing density elsewhere in the city, allowed in appropriate locations, the need for open space and places for reflection, recreation, and community events will be even more necessary to keep our citizens healthy, engaged, and spur the creativity that makes Vancouver, Washington unique and special. While the need to provide more housing is necessary, it is imperative that decisions are not made that irrevocably harm the quality and historic values of the city. These characteristics create a healthy, welcoming environment. The determination to develop housing in long held green space or long-established historic neighborhoods comes off as a quick, short term, and thoughtless approach to addressing new housing needs. A long-term approach that respects our history and our people will better serve existing and future residents. Our citizens deserve a city that properly represents our community, without the needless destruction of the long established and historically-significant portions of our City. We need to maintain those elements that define the special nature of our community to continue to make Vancouver, Washington a desirable and well-designed place in perpetuity. Very Sincerely, Douglas C. Wilson, Ph.D. [address] Vancouver, WA 98661 Phone: [phone number] cc: Jan Bader, CC Historic Preservation Commission Andy Gregg, CC Historic Preservation Commission Chatham Olive, SNA Chair "	
BE	"> Meredith Herbst > City Hall > PO Box 1995 > Vancouver, WA 98661 > > > My name is Barbara Nunn and I live at [address], in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS. I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. > > My reasons for opposing these alternatives are because adding commercial and mixed-use to our neighborhood would mean losing the qualities that make Southcliff a desirable place to live. These qualities are safe, quiet streets,	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	mature trees and habitat that provide for wildlife and natural beauty. In addition, adding mixed use and commercial with no parking would mean our streets would be jammed with parked cars and additional traffic from proposed businesses, increasing the likelihood of accidents and removing the open, safe quality of the neighborhood. > > I enjoy the park where many people from other neighborhoods visit for the peaceful quiet, safe environment with their families. Groups of moms bring their toddlers for these very reasons. The beautiful open space, blooms and shade and wide streets are perfect for walkers and bike riders from other neighborhoods to relax and enjoy as much as I do. > > I understood from communications and plans that the Heights District is to be where commercial and mixed-use high rise buildings would be built. If the City needs more density please add it to the Heights plan and not Southcliff. > > In addition to population growth, the EIS projects job growth. All kinds of jobs are continuously created by the homes in Southcliff, which because of their age, need repairs and work to keep them functional and updated. All types of contractors, landscapers, arborists, and other trades, roofers, painters, HVAC. Most of these are good paying jobs for members of the community and promote small business growth. > > The other logical reason for preserving Southcliff as the historic neighborhood as it stands, is that besides safety, wildlife habitat, tree density and natural beauty, it attracts employers who are seeking highly skilled employees who are looking to live in a neighborhood with these qualities and also close to the downtown core. > > I appreciate the opportunity to provide my comments to this important process. > > Barbara Nunn"	
BF	"My family moved to Southcliff in 2008 after searching for a suitable location that included an appropriately sized home, space for our young children to play both on property and on the street as well as the local park. It was also our hope that we could age in place after retirement, since Southcliff's wide quiet streets allow for walking and biking in relative safety due to low traffic encouraged by the original layout of the neighborhood. We discovered that the term "neighbor" extends well past the house on the left or right, and well into the entire community of Southcliff. Relationships are built through casual meetings in the park, on dog walks, more formal activities such as holiday celebrations, and neighborhood meetings, resulting in a truly unique experience for our family. Now, as a longtime resident of the Southcliff neighborhood, I am writing to express deep concern on how the proposed zoning changes along Mill Plain Boulevard as outlined in Alternatives 1 and 2 of the Draft Environmental Impact Statement for Vancouver's 2025–2045 Comprehensive Plan would change the character of this special neighborhood. Southcliff is a legacy residential neighborhood with a well-established character, mature tree canopy, and a strong sense of community. The proposed Urban Mixed Use and Corridor Mixed Use zoning designations along Mill Plain do not align with the scale, infrastructure, or values of this area. Specifically: Safety: Increased density and commercial activity will lead to higher traffic volumes and pedestrian risks on streets not designed for such use. Traffic generated by these up to 8-story buildings proposed along Mill Plain, will be forced onto our existing residential streets, none of which are designed as thoroughfares. This will cause increased risks for accidents.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	Umatilla Way, a primary access point for the largest proposed development, is ""right turn only access,"" further funneling traffic onto already narrow residential roads used by pedestrians and cyclists. Parking saturation due to limited onsite parking would push overflow onto Southcliff streets obstructing views, narrowing lanes and making it difficult for first responders especially firefighters to respond to emergencies in a timely manner. Privacy: Taller buildings and multi-unit developments will compromise the privacy of adjacent single-family homes: Reduced visual privacy due to taller buildings overlooking homes. Increased noise and activity, diminishing the quiet residential environment. Loss of personal space through parking saturation and greater public presence on private streets. Noise: Mixed-use zoning introduces commercial noise, increased foot traffic, and potential late-night activity incompatible with Southcliff's quiet residential environment. Parking: The proposed zoning eliminates off-street parking requirements, which will result in overflow parking on narrow residential streets, creating congestion and access issues for the current residents. Destruction of Tree Canopy: Redevelopment threatens the removal of mature trees that define Southcliff's environmental character and contribute to climate resilience. Increased zoning density would have a huge impact on our tree canopy which directly conflicts with Vancouver Urban Forester Charles Ray's stated goal to ""support improving the health of our natural systems, increasing our community's tree canopy"" Southcliff's mature tree canopy adds to the character and innate beauty of the neighborhood, also serving to regulate temperature and providing habitat for a wide variety of wildlife. Many of these trees are over 70 years old and I suspect would qualify for protection as Heritage trees. Southcliff's canopy has been assessed at over 47% -the highest in the City - while the average Vancouver neighborhood is 19%, thus contributing significantly to Vancouver's Tree City status. Neighborhood Character: Southcliff's identity is rooted in its mid-century architecture, spacious lots, and cohesive residential rhythm. The proposed zoning undermines this legacy. Furthermore, Southcliff has had CC & Rs in place and actively reviewed since 1955 that restrict commercial and multifamily development. These covenants reflect long-standing community standards and should be respected in any future planning decisions. There are other areas in Vancouver—such as MacLoughlin Heights, Mill Plain east of Andresen to I-205, and the Fourth Plain corridor—that are far better suited for the proposed mixed-use and higher-density development. These areas already have transit infrastructure, commercial nodes, and zoning patterns that support the city's growth goals without compromising established neighborhoods. I urge the city to revise the proposed zoning map to preserve Southcliff's Low-Density Residential designation and consider implementing design overlays or transition zones to buffer the neighborhood from incompatible development. Southcliff deserves thoughtful planning that honors its history, protects its environment, and respects its residents. Sincerely, Martin Jacobson Southcliff Resident Vancouver, WA"	
BG	"1 August 31, 2025	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Meredith Herbst City Hall PO Box 1995 Vancouver WA 98668 Email to: amcenerny-ogle@cityofvancouver.us epaulsen@cityofvancouver.us bhansen@cityofvancouver.us kharless@cityofvancouver.us dperez@cityofvancouver.us tstober@cityofvancouver.us sfox@cityofvancouver.us Re: Draft EIS – SouthcliU Neighborhood The Honorable Mayor McEnerny-Ogle and Councilmembers: My name is Judi Burkdoll and I reside in the Southcliff neighborhood at [address], the most easterly lot of the proposed changes in zoning adjacent to Mill Plain Blvd. Proposes which the City Council will be considering when updating Vancouver's Comprehensive Plan. Proposes to which I strongly object. I chose the purchase in the Southcliff neighborhood twenty-four (24) years ago at considerable risk financially in that I was and remain a single individual with only one income. However, the risk seemed worth it as the neighborhood consisted to single family homes which were not cookie-cutter homes. Additionally, the neighborhood took pride in ownership with excellently maintained homes and yards, as the neighborhood continues today. With Southcliff being so close to Tower Mall/TownPlaza, I understand completely why it might seem wise to go with these proposed zoning changes. Why not, adjacent to The Vine which would key it to the waterfront project. Everything is good, right? Wrong! This matter needs to go back to the drawing board and come up with a Plan D or E for consideration. 2 Has the Councilmembers, Planning Commission members, or planners for that matter, even driven around the various neighborhoods in Vancouver. Many is the central area of the city could use some updating, perhaps that is where the various proposed zoning should be considered. Neighborhoods needing revitalization wherein a developer or investor could qualify for a lowinterest neighborhood revitalization loan. Not Southcliff which is a beautifully maintained historic neighborhood. I would even venture to say that Southcliff could be a holiday tourist attraction such as Peacock Lane in Portland should the Council encourage such a venue and the Southcliff Neighborhood Association be receptive to such a plan. Additionally, I question the influx of residents proposed for Vancouver in the next twenty (20) years. Where did the State come up with that figure. And, was the number of baby-boomers figured in the calculations as there are many of us who will be dead or in a long-term care facility in twenty (20) or less years. Long-term care facilities which Vancouver has more than its fair share with more being built. Point is, many of the baby-boomers own homes which will be available to new residents in the next decade or two. Has that even been considered when reviewing Vancouver's Comprehensive Plan update for year 2045?	

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	With respect to the three (3) zoning designations proposed in the Southcliff neighborhood, all of which I strongly object, while those lots adjacent to Mill Plain within the proposal might see a slight increase in property value at the time of sale due to the Mixed Use designation, while the remaining neighborhood, particularly those directly across Willamette Drive would likely see a significant decrease in the property value due to the drastic change in the structure of the neighborhood. The current desire for home buyers wanting to live in Southcliff would be drastically diminished due to additional parking limitations and accidents, noise and environmental pollution from vehicles not to mention the filth and congestion. Should the City decide to make Mill Plain between Andresen and Vancouver Way such as Fourth Plain there would be even more congestion and likely accidents. Dependent on what types of businesses were permitted on the ground floor of buildings would also play a part in whether a home-buyer would seriously consider purchasing in the Southcliff neighborhood. Would you want to live next or close to a 3- 5 story-building with apartments and businesses on the ground floor, possibly a strip club, loud bar or rehab/recovery center? Why do I feel 3 the City would have limited, or no say, in the types of businesses that would open. While I realize change is inevitable and Vancouver will continue to grow, I respectfully ask the City Council to reject these zoning proposals and seek a better avenue than Southcliff for these proposed zoning changes. Why fix something that isn't broken? The City of Vancouver should be proud of the Southcliff neighborhood and fight to keep it intact. And my thinking, the Council represents the City of Vancouver. Thank you for your time and consideration. Kind Regards, Judi A. Burkdoll [address] Vancouver WA 98661 "	
BH	"To: Committee on Up-Zoning South Cliff Neighborhood/City Officials 415 West 6th Street Vancouver, WA 98661 To Whom This May Concern: My name is Nancy McKibbin, and I have lived in the South Cliff neighborhood for 45 years. My husband and I chose to raise our two children here because of its safety, privacy and the strong sense of community among neighbors. I am writing to you to express my strong opposition to the proposed up-zoning changes in Vancouver, specifically within the South Cliff neighborhood and surrounding established residential areas. While I recognize the need for thoughtful planning to support our city's long-term growth, the current proposal represents a total and complete shift in land use—one that is careless, overreaching, and fails to address the real needs of this community. South Cliff and its neighboring single-family communities are longstanding, stable and highly valued for the very qualities that make Vancouver an attractive place to live: character, safety, privacy, walkability and genuine sense of community. Families, retirees and individuals have chosen to invest and build their lives here because of these qualities. To replace them with high-density, multi-use development would be to strip away the very essence of what draws people to our neighborhood. Beyond undermining community's character, the proposed zoning changes carry serious risk and negative impacts, including: • Loss of property value for existing homeowners who have invested in the neighborhood	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	• Reduction in safety due to the increased congestion and traffic hazards. • Loss of privacy as multi-use, high-density structures disrupt established residential living. • Loss of walkability and the safe streets that currently allow children, families and elderly residents to enjoy the neighborhood. • Erosion of community bonds, which thrive when neighbors know and support one another in a stable residential environment The increase in density and commercial activity in areas like South Cliff will create congestion and unsafe conditions for all members of the community; This is not a targeted, balanced approach to zoning—it is a blanket change that disregards the expressed needs and desires of the very residents it impacts most. Comprehensive city planning should carefully weigh growth needs with community preservation, not undermine decades of established character and investment. I urge the City Council to reject the proposed up-zoning in South Cliff and surrounding areas and instead consider zoning adjustments that are more balanced, thoughtful and responsive to both growth pressures and the values of our residents. Thank you for your time and consideration of this matter. I appreciate your commitment to ensuring Vancouver's growth is managed with wisdom and respect for its citizens. Sincerely, Nancy McKibbin [email address] "	
BI	"Bridget Marick & David Curran [address] Vancouver, WA 98661-5921 August 23, 2025 Meredith Herbst & Vancouver City Planners, City Hall PO Box 1995 Vancouver, WA Dear Ms. Herbst and Vancouver City Planners, My husband, David, are both medical professionals and we moved to Vancouver in November 2015. We did not want to live in Portland for several reasons. Therefore, we limited our search for a home to Camas and Vancouver. We looked at several properties including [address] in Vancouver which is a nice home. It was built in 1992 with a 3 car garage and everything one would think a home buyer would want. However, the back yard of this particular property butts up to duplexes and multi-family homes. We did not buy the house on 7th Place for that reason. David and I chose to buy a home in Southcliff because it is a beautiful neighborhood with larger lots and the majority of the homes are established and well maintained from the 1950's. Our home at [address] was built in 1957 by Bob and Wilma Dungan. They lived in this home for 30 years until they sold it to David and Kelly Christel. The Christels lived in this home for 28 years before my husband and I bought it in 2015. Like other houses in Southcliff, our home is well built by an individual, not a developer, which makes the entire neighborhood unique. Southcliff is not a cookie-cutter, put up over night, kind of a neighborhood. Because Southcliff is an older, established neighorhood, there is a large, mature tree population, which is another reason my husband and I love the neighborhood. With mature trees there are birds, including owls, and other wildlife, like deer, raccoon, and Opposum. You can catch a glimpse of them if you are up at the right time of early morning or	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	night. Without a doubt, trees will be taken down to allow for mixed use, medium scale, and even low-scale development. With loss of mature trees comes loss of habitat and food for wildlife, especially birds. I will never forget the first time I saw a Western Tanager. It was perched way up high in a mature tree in my yard. The Western Tanager is a brightly colored and beautiful bird that breeds in Western US and Canada. It winters in Mexico and Central America. This bird relies on mature trees for habitat and food. Without these mature trees, the birds will be most affected. As outlined in the profile of the Southcliff Neighborhood City Plan of January 22, 2001, the shape of this neighborhood is dictated by topography rather than public roads. The boundaries of this place are made up of steep bluffs, hence the name and one can only access it by 3 streets: Rhododendron, Manzanita, and Umatilla. It is a small neighborhood with minimal access. Commercial development and high rise apartments would, without a doubt, impact traffic, parking, safety, and the uniqueness of the place. People seek out this neighborhood to walk, exercise their dogs, and teach their children how to ride a bike because the streets are safe and quiet. There is great history associated with Southcliff, It is the southwest corner of MeLoughlin Heights which is one of 6 housing developments brought on by the influx of population to Vancouver sparked by WWil and Kaiser shipyards. Even back in 1945, when WWil ended, residents expressed concerns that the land of the housing developments would be released, willy-nilly, to private investors. Their concerns were warranted because it would spell disaster to real estate values for private home owners in Vancouver. I am one of 10 children who was fortunate enough to go to college and earn a degree. My parents could not afford to pay for my college or help me buy a home. But, they taught me values such as working hard and earning my way. My husband and I are wage earners. We worked hard in order to pay for our home in Southcliff. I often worked two jobs. David and I are concerned that the mixed use plans have little regard for the small home owners whose life saving may be at stake. Do we want future generations to have an opportunity to purchase a home in and live in Southcliff? The answer is yes. But a home located adjacent to mixed use, combination housing, and commercial businesses in Southcliff is not what my husband and currently have. We want to ensure future home owners of our property have the opportunity to buy it, as is, in the neighborhood as it currently is without tall apartment buildings and commercial influence. There are plenty of other locations to consider for housing development projects in and around Vancouver. It seems there is potential for developing the vacant lots near Winco on Andresen Road. There are Vacant lots along NE Vancouver Mall Drive. Perhaps better use could be made of the 23.22 acres that consists of Forth Plain Center. Maybe a deal could be arranged with Living Hope Church on Andresen Road for a mixed-use neighborhood. The old Tower Mall development is already underway. The City of Vancouver discontinued lease of the land for Vanco Golf Range for a Heights District Development project. Other golf courses such as Lakeview Par 3 Golf Challenge, The Cedars on Salmon Creek, and Hartwood in Brush Prairie are already being developed. Maybe sights could be set on Royal Oaks Golf Club for a housing development. I dare to wonder how the members of Royal Oaks would react to that type of plan. I dare even more to think of their reaction to plans for mixed-use housing in their very own neighborhoods. David and I feel blessed to have been able to buy our home in Southcliff and as such, we are stewards of this property and the neighborhood as a whole. We would not have chosen to move to Vancouver if there was no opportunity to buy a home in a neighborhood like we currently have. As honest stewards of Southcliff, we oppose the proposed comprehensive zoning plan. Sincerely, Bridget Marick & David Curran "	

ID	Full comment	Response
BK	"I moved to Southcliff for its quiet, walkable streets and beautiful trees. Adding commercial and mixed-use with no parking required would mean our streets would be jammed with cars parked on both sides and would no longer be quiet or walkable, not to mention tree loss and noise. Access to commercial and mixed-use high rises would not be from Mill Plain but rather from our neighborhood streets creating huge congestion on those streets not to mention safety issues for pedestrians and cyclists. Our neighborhood rain garden was designed to help remove pollutants in rain-water run-off based on the current volume of vehicles. Adding hundreds of cars to Southcliff streets would greatly increase the volume of pollutants. And adding more impervious surfaces would greatly increase run-off. Southcliff is a historic mid-century modern neighborhood that should be preserved as in and no destroyed by the City just to make room for people who might (or might now) move here by 2045. Jim and Sharon Walling"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
BL	"Our Vancouver 2045 @city of Vancouver.us Meredith Herbst City Hall PO Box 1995 Vancouver, WA 98668 RE: Réponse to city zoning changes FR: Leann Nolan, home owner since 1980s at [address], Vancouver, WA 98661 hann Man Introduction of a Southcliff home owner: , Leann Nolan, have lived in the Southcliff neighborhood since 1980. | chose the area for the established trees and landscape, the safety and freedom to exercise, the neighborhood atmosphere to raise our daughter, and the quiet streets. The following is my personal response to the city proposed rezoning plans. Review and comments on the Rationale for rezoning changes to single home house neighborhoods and response to planning proposed zoning for the Southcliff neighborhood: Proposed Alternative1 and Alternative 2. This plan essentially rezones for a massive mixed use for all single Southcliff home lots. The Mixed-use along Mill Plain the northern edge would allow housing of 3-8 stories and commercial use(businesses) with ground-floor retail or office. Or, the medium-scle neighborhood from Mill Plain to Oregon Dr and much of Umatilla Way would accommodate 2-5 story high use for broad range of housing types, civic/institutional buildings?, and neighborhood commercial space. But even the remaining of the Southcliff neighborhood is now all rezoned for 3 story dwellings. Essentially all of these planned city proposals do not support single dwellings in a once established cohesive neighborhood. These plans will essentially destroy the existing Southcliff neighborhood. This would open up a total mismatched style of construction: businesses and mixed dwellings among existing single family homes. In fact, the rezoning plans include for ALL Vancouver city single home lots to be rezoned for up to 3 stories high 6 units. Essentially the city wants to eradicate all single home lots? If not this needs further explanation to city Vancouver city dwellers and potential buyers. This plan will create a non cohesive, visual displeasing unappealing appearances high rise among single home as not all dwellers will sell at equal times), congested transportation patterns along either air pollution, safety concerns with cars using two neighborhood entrances to a now unlivable neighborhoods. Is this an answer/approach to Agenda 30 and the 15 minute neighborhoods?	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	Where does HB 1110 tell the planners to do such drastic rezoning? Does the city promote this and if so the city elected officials need to explain this to ALL Vancouver City constituents. In the name of equity and inclusion is the city making this type of rezoning throughout all of Vancouver city: HazelDell (there is a large bus inclusion there) to East Vancouver? Southcliff is exceptional and has a city_granted covenant.. Why would this be legal for the city to make such drastic powers to destroy a cohesive neighborhood? Currently the Southcliff has a neighborhood covenant granted by the city which was recently update. Does this rezoning negate this covenant? Nowhere in the covenant does the city give freedom to plan for several units on a one lot. Nowhere does it state that the city has the right to change zoning without the neighborhood consent. Is the city essentially land grabbing by these actions? Safety and air quality is a key formidable issue is these rezoning_proposals. These safety issues leaves the city vulnerable for further legal actions. Additional building units in the Southcliff neighborhood with the two existing entrances is a grave concern. All the future traffic would be funnel through these two entrances to make it so busy that it would negate much walking besides increase the level of air pollution from additional exhausts from cars either visiting or living there. Reminder that Mill Plain is on the north edge of Southcliff. This rezoning will only add stress to air livability. In addition the federal powers lines cross through the entire neighborhood for Southcliff. In fact many of the lots are larger to accommodate any power issues for owners health. Building higher dwellings near high rising voltage PUD lines needs careful review to dwellers health as compared to the Southcliff midcentury lower style. These issues need careful review and planning beyond simple rezoning increased population housing. Again, the federal power lines have an easement that demands a careful review for the city, PUD for any higher rise buildings. Southcliff has an unprecedented unique historical mid-century cohesive style neighborhood in the Vancouver city limits.. The proposed rezoning to Southcliff will certainly destroy many of these features. The homes of Southcliff tends to have higher city tax value with kept landscapes, access to ridge views of Portland, and maintained homes. The imposing of up to 6 units on each property is a major change in all the city ordinances. This promotes the displeasing appearance of no cohesiveness. Home owners could randomly build in any style, compact any number of dwellers and totally upend the usability. I, a homeowner, do not see this as progressive/proactive in the need to increase housing in the city of Vancouver but rather I view this as totally destructive. There are many undeveloped areas within the city limits to equally include density. Your plans suppose that Vancouver will exponentially have growth rates of overwhelming numbers. Your plans do not discuss impaction factors that may or may not influence the current population increases such as economics, political issues of other states as well as our own state of Washington. The border explosion of population has slowed which has seemingly pushed many to seek more housing and caused much population movement. Also, people moving here may not choose to live in compacted areas such as proposed but rather more out to more nearby counties. Not everyone wants the unlivable overcrowded Portland style neighborhood such as Sellwood or the insattion of housing in an established neighborhood such as EastMoreland. This rezoning created these for examples of compacting unnecessarily to unlivable areas. But, what if the numbers of people moving from areas such as Portland and California decrease? Your projections do not allow for alterations. By the time you make al alterations to the zoning you will have destroyed much of the good this city possesses. The patterns of unending flux will not last to perpetuity. History verifies this. And in the meantime the rezoning would potentially create a hodgepodge and destroy much of the historical heritage city image. Again, once cohesive neighborhoods would have be broken to high-rises among single dwelling homes, poor traffic and parking patterns and gone/eradicated forever. Unlivable and undesirable. Plan instead: Why not equally plan for increase of city dwellers throughout the city instead of a heavy concentration in particular neighborhoods like	

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	Southcliff? Review growth in areas where more land allows new buildings such as Fourth Plain and north city Vancouver without upending a cohesive neighborhood. Why is the city heavily rezoning Southcliff when other neighborhoods seemingly are more exempt? I only observe more concentrated rezoning in particular areas. Why not wait for the completion of Tower Mall to see the impact to the community it surrounds before just projecting way beyond for massive neighborhood changes such as proposed to Southcliff and even the impact of Braewood? Questions that need addressing for all Southcliff and Vancouver city. taxpayers. Why not involve all of the city dwellers in planning rezoning? There currently is little rezoning planning published in the local paper or any neighborhood flyers presented to the current city dwellers. The city website is totally inadequate to disperse information to all. In fact, the website is difficult to maneuver and truly get the whole picture of what is proposed. Even little is published in the local newspaper regarding these plannings. Review the HB 1110 more carefully as to what planners have rights to do to a city. Did the state of Washington give rights to the city planners to destroy city covenants and forever alter established neighborhoods throughout all the city? In fact, I did not perceive this when reviewing it. Why increase air pollution on particular bus lines along with increased cars to create pockets of air non livability? Do the city leaders desire the destabilization of established neighborhoods? Do they see this as equitable or fair to all city citizens they represent? How does this affect property value and what are their projected estimates? The neighborhood of Southcliff is particular heavily impacted by the proposed rezoning and deserves a better explanation. Is Southcliff used as an example of removing property owners rights? How would our city elected leaders feel and react if this proposal was happening where they had lived for an extended period of time? What does this say about city leaders looking for the best interest of their citizens? Our city leaders need to better explain why Southcliff is seemingly singled out for destruction. Does the city promote the destruction of matured vegetation and trees that will be impacted in proposed housing units? Surely, vegetation will be destroyed in new high rise building. Does the city promote congestion and increased air pollution in concentrated areas as Southcliff? Does the city promote less safety for the Southcliff neighborhood because the increased hodgepodge development along with more cars with high rise units among existing established homes? Does the city promote less home security with the influx businesses and rentals/leases on the north end of Southcliff? Are you increasing police security to accommodate?. How does this impact my property value? Or is the city looking for more tax revenue by cramming more people in my back yard? Any building development as described for Southcliff will occur in a hodgepodge manner and will be very dependent on economics and desires as to the type of living conditions desired by new incoming people. Based on the city actions of Tower Mall, I do not expect any type of projected completion as described. In conclusion, I a long time city dweller and long time house owner in Southcliff, am greatly concerned for my and my neighbor's wellbeing. I question the support by my city elected officials and the degradation of my rights in a once stable area of Vancouver. I am deeply concerned on the impact to my property and its value. I am greatly concerned that the city has the right to rezone any neighborhood and change the established buildings and quality of life. Hopefully, you might read my comments and seriously consider the impact of my thoughts. I feel so let down from some type of functioning representative governing body. Is the city looking out for its citizens best interest? Is the city listening or asking for citizens concerns and desires? I need more explanation and responses as to how the city planners and elected officials would feel if this happened to them. As a city home owner, what and where are my rights? Are we as citizens improving living conditions for future generations or are we promoting areas of non desirability and non livability? I do not see any desirability but much chaos in the rezoning proposals.	

ID	Full comment	Response
	Stressed, threatened, concerned, let down, demoralized and shocked that a city could rezone any area, alter the entire style of life and affect owners' property rights and value. Leann Nolan "	
BM	"For The Mayor, City Council, City Planners of Vancouver: Having served as an elected official for nearly 20 years, I know how difficult decisions can be. I don't envy you with the current political and economic situation. Nonetheless, I am compelled to oppose the Draft EIS Action Alternatives 1 and 2. I understand your sense of urgency to build affordable housing; however the new proposal to provide more density along Mill Plain to include the Southcliff Neighborhood, shows no concern for existing housing and residents of our small neighborhood. It demonstrates a lack of cultural understanding, history, and knowledge of neighborhood and park. Why would you want to cause grave damage a high functioning, healthy neighborhood? The proposal will create serious safety issues for the many neighborhood walkers and children going to and from the park. The park is a very small, quiet place enjoyed by families and young children for t-ball and soccer, picnics, and dog walkers. The expediency by city planners to fill in gaps on a map without proper infrastructure planning is shortsighted and will be a long term detriment to the city. The lack of planning for adequate parking in particular is appalling in the approved Heights area. A Vancouver city planner recently stated that surveys showed that people, when offered a choice, preferred to have housing rather than parking. This is a specious (I mean really ridiculous) non-choice. The new Draft EIS zoning changes would further exacerbate the Heights District issue. The traffic and noise along Mill Plain is already bad. I can't imagine the future with another 4,500 residents just blocks away. The lack of foresight for future needs is startling. The need for jobs, solid economic base, and strong schools must be a priority for the future of the City of Vancouver. Decisions made by the City and State have put enormous pressure on our Vancouver School District south end schools and infrastructure in urban neighborhoods. Our county and nearby cities must take their share necessary housing. Vancouver alone cannot take responsibility for the needed low income and mixed use housing and related infrastructure requirements. Poverty, high numbers of English Language Learners, have swamped our schools. Despite hard work by caring educators, staff, and wonderful community resource centers, there is increased need for counselors, nurses, interventions, and family support in this era of declining budgets. Programs and staff have been cut. Limited AP classes in the VPS south end high schools and poor attendance, are demonstrated by low test scores. Middle class families or families of means move to "Homeschooling", Camas, Ridgefield, our north end schools, or private schools. The disparity of the SES (socioeconomic status) among our students keeps growing. The state ranking by Niche of our VPS south end schools is lower. Extra curricular and sports activities also suffer with less parental involvement and team support. Our VPS north end school kids have referred to the south end as "Ghetto" kids! We know that the correlation SES and success is hugely determined by income, education, occupation, and neighborhood environment. To have large numbers of high needs kids in our south end buildings is overwhelming. When my husband and I moved here over four decades ago, the schools in the district were more balanced and thus more able to help kids in need. For that reason I also oppose increasing the buildings to eight stories in the Heights District to avoid a "tenement" feeling to that area. Smaller is healthier, meaning less crowding and crime. (By the way you should look again at your original architectural drawings by Seattle architects of the Heights Plan. An engineer friend calls those schematics "sucker drawings". I can't help but think that city council members and public alike were suckered or misled by those beautiful drawings...) Thank you for your concern and attention to detail. Your service to our community is greatly appreciated. Mari Greves [address]	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	Vancouver, WA 98661 [phone number] "	
BN	Memorandum VIA EMAIL To: Chad Eiken, Community Development Director; Rebecca Kennedy, Deputy Community Development Director; Bryan Snodgrass, Principal Planner c/o Meredith Herbst cc Mayor Anne McEnerny-Ogle, Vancouver City Councilmember Kim Harless, Vancouver City Councilmember Diana Perez, Vancouver City Councilmember Ty Stober, Vancouver City Councilmember Sarah Fox, Vancouver City Councilmember Erik Paulsen, Vancouver City Councilmember Bart Hansen From: Stephen W. Horenstein Date: September 3, 2025 Subject: Southcliff Homeowners Association Comments on the Draft Environmental Impact Statement and Initial Comments on the Vancouver 2045 Comprehensive Plan Update Dear Chad, Rebecca, Bryan, and Meredith, Thank you for the opportunity to provide comments on the Draft Environment Impact Statement ("DEIS" or "EIS") for the Vancouver 2045 Comprehensive Plan Update ("Plan") We do so on behalf of the Southcliff Neighborhood ("Southcliff"). We commend the City of Vancouver's ("City") efforts to do its best to address housing legislation passed by the Washington State Legislature over the last few years. However, we do believe that your designation of Commercial and Medium Scale Neighborhood for Southcliff will be ineffective in implementing the Plan, and as to the proposed middle housing, is violative of a contract between Southcliff property owners and the City and its instrumentality the Vancouver Housing Authority and goes beyond the legislative mandates you have received. THE NEIGHBORHOOD Southcliff is a neighborhood of midcentury modern homes created in the mid-1950s and built out through the mid-50s well into the 1960s. Its infrastructure is designed for single-family residential use including road width, water and sewer. It has a Bonneville Power Administration ("BPA") power line running through the proposed area to be changed. It has limited access through only three locations from Mill Plain Boulevard. Historically, it had commercial development close by, including a Safeway store and the Tower Mall. Across MacArthur Boulevard from Southcliff's east side is new mixed-use development, which is currently owned by Vancouver and is designated for a mix of commercial and residential uses. THE COMMERCIAL DESIGNATION Alternatives 1 and 2 of the DEIS include a designation Mixed Use Neighborhood ("MX") for the houses that backup to Mill Plain, a major arterial without the opportunity for additional access into the neighborhood. This designation is inappropriate for this location. In a Simplified Draft Use Table on page 25 of the recent PowerPoint provided to the City Council, staff has indicated that office, primary retail, residential, and perhaps institutional and secondary retail would all be allowed in this zone. These uses other than single family residential are entirely incompatible with the existing neighborhood. It is highly unlikely that these uses would ever occur at this location. The strip of a MX is designated along the entire border of Southcliff. The lots are largely not deep enough to support the type of development contemplated for a mix of uses, building size, and particularly, parking. As to the latter, this will push parking into the single-family residential neighborhood and create traffic and safety issues.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood. The proposed Preferred Alternative documented in the Final EIS applies Low-Scale Neighborhood and Medium-Scale Neighborhood zoning to the Southcliff neighborhood. Medium-Scale Neighborhood is applied to properties adjacent to Mill Plain Boulevard and Southcliff Park, in alignment with the Council's Framework for getting to a Preferred Alternative. Mixed-Use Neighborhood zoning, which was proposed for portions of Southcliff in Alternative 2 analyzed in the Draft EIS, has been removed. Refer to Common Response #1 for more information about the Preferred Alternative, including how it was developed. The Public Facilities and Services element in the Comprehensive Plan and associated Capital Facilities Plan that lists planned capital facilities projects or six and 20-year time horizons are mandatory components of the City's Comprehensive Plan periodic review update. The Public Facilities and Services chapter identifies existing City capital facilities and services, existing capacities and likely future demands, level of services standards, planned future investments and costs, and funding sources for these future investments. The Capital Facilities Plan provides detailed project lists for the 1-6 year and 7-20 year planning periods for all required facilities and services including wastewater, water, surface water, solid waste, fire and emergency services, police and public safety, transportation, parks, recreation and cultural services, and general government facilities that serve multiple service areas like the new City operations center and City Hall, among others, supported by a six-year financing plan. These components meet the requirements for capital facilities and service planning under the Growth Management Act and relevant state statutes. Refer to the Transportation and Public Services and Utilities sections of Final EIS Chapter 3 for information about measures for addressing transportation infrastructure and utilities needs under the Preferred Alternative. Refer to the Plants and Animals section of Final EIS Chapter 4 for more information about measures to meet the City's tree canopy goals. H.B. 1110, the middle housing law enacted by the legislature in 2023 requiring the City to allow a minimum of 4-6 units per residential lot, is not the only state requirement that the City is required to meet. H.B. 1220, passed in 2021, requires the City to accommodate a set number of units distributed by income band. In Vancouver's allocation, the City needs to show capacity for nearly half of the units to be affordable below 100% area median income. This requires the City to demonstrate allowances for smaller and relatively more affordable dwelling units in addition to total capacity requirements. Medium-Scale Neighborhood zoning allows for more multifamily development in areas across the City to help meet this requirement. The City of Vancouver is not a party to and does not interpret or enforce private contracts, including private conditions, covenants and restricts (CC&Rs). It is the responsibility of parties to these private contracts to enforce them.

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	Designating this location as mixed use may solve a math problem by showing commercial uses on the map, but it doesn't address the reality of providing the amount of commercial development/jobs the community needs and staff is required to plan for and present to elected officials for consideration and approval . Staff has advised that this designation is there for the long term. This neighborhood is already approaching 70 years old. It and its homes remain extremely well kept, and property owners are active in ensuring it stays this way. There is no reason to believe that now or in future years property owners would be willing to allow MX development to occur on their various properties. A review of an early draft of the proposed form-based code language for MX provide for the following densities: • Residential densities – 32 units per acre minimum with no maximum • Residential height – 3 to 8 stories with a maximum height of 90 feet This proposed code would also include, along with midrise residential buildings, related commercial activities such as professional offices, medical services, cafés, restaurants, grocery stores, markets and other retail shops. Again, although the math may work for the overall proposed citywide plan, from a planning perspective this is not a reasonable development scale at this location. THE RESIDENTIAL DESIGNATION Across the residential street from the proposed MX designation identified above, the DEIS map indicates that the land use would be changed to the Medium Scale Neighborhood designation. This designation is also inappropriate at this location. This designation calls for more density on single family lots as provided for in recent housing legislation. Again, a reference table presented to the City Council identified the following densities: • Density – 16 units per acre minimum with no maximum • Height – two stories and 25 feet up to five stories and 60 feet maximum These densities and heights, even at the minimum level, are out of scale with the neighborhood and are certainly not supported by the required capital facilities as indicated below. The Medium Scale Neighborhood appears to provide for not only larger residential uses but civic/industrial uses, office uses, and primary retail uses as well. Together with the MX zone across the street, an entirely different set of incompatible uses would be imposed on the neighborhoods. And, it would do so with the only access being provided from existing streets sized for single family homes at one per lot. CAPITAL FACILITIES Washington's Growth Management Act ("GMA") requires comprehensive plans to have a capital facilities element. See RCW 36.70A.070(3). Included within this element must be a financing plan identifying how capital facilities will be paid for. A separate transportation element must be specifically included and must be coordinated with the land-use plan. It is the law under GMA that if the capital facilities plan and its funding are insufficient to support the proposed land use comprehensive plan, the land use plan must be revised accordingly. Capital facilities in the Southcliff Neighborhood as they exist today are generally 70 years old and woefully inadequate to support both the MX and Medium Scale Neighborhood designations proposed in the draft EIS: Roads are relatively narrow and built to 1950s-1960s standards without room to expand them and add the turn lanes and sidewalks necessary to serve much more dense commercial and residential development. Sewer capacity has not been sized to serve additional commercial and residential density beyond the current and fully built out residential neighborhood. Stormwater facilities were recently upgraded at a cost of $2.7 million to serve the Blandford Canyon to ensure that runoff traveling down the canyon and ultimately reaching the Columbia River has been properly treated according to current legal standards for existing developments and the Heights project. The DEIS does not address any further improvements in this regard to accommodate more dense development. This is exacerbated by the proposal to	

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	increase development density and perhaps uses for the Heights project by applying the Regional Activity Center for that project. The Southcliff Neighborhood has a significant tree canopy in the area proposed for MX and Medium Scale Neighborhood designations. Removal of the trees necessary for buildout under these new designations will require significant tree removal with no real ability to replace them in connection with such redevelopment, creating noncompliance with the City's tree ordinance that would be difficult if not impossible to mitigate for. The draft EIS is devoid of any discussion of the foregoing capital facilities issues for the new land use designations for Southcliff. The comprehensive plan cannot be fully completed without also completing capital facilities planning that addresses the issue set forth above. This is true as to planning for all of Vancouver. We do not believe that required public share of this funding will be available to address the significant capital facilities the issues associated with the proposed new zoning designations will create. The capital facilities implications of the redesignation of land for Southcliff (and communitywide) are enormous. None of these issues are adequately addressed in the DEIS and facilities planning materials have not been released that identify how the City plans to upgrade roads, sewer, and water, and address the environmental impact on the Blandford Canyon. REDESIGNATION AS PROPOSED IS NOT LEGAL There are a number of legal issues that make the MX and Medium Scale Residential comprehensive plan/zoning designations indefensible as changes to the comprehensive plan and zoning code: A. The Proposed Plan and Maps Exceed the Legislative Mandates of E2SHB 1110 ("1110"). 1110, passed by the legislature in 2023 and signed by the governor, certainly did its best to address "missing middle" housing for those communities planning under GMA. This legislation required such communities to revise their comprehensive plans and zoning designations to increase the number and types of housing in areas previously dedicated for single family detached housing. 1110 requires communities planning under GMA to authorize more dense development within its existing residential zones. It is not, by any reading of the statute or its legislative history , a mandate that cities provide wholesale redesignation of large swaths of property for more dense development, leaving existing single-family dwellings as nonconforming uses. A review of early draft code language implementing the "middle housing requirement" does not provide any protection as conforming uses for such properties. The DEIS does not address this issue. Staff has informally indicated that redesignation of land for "middle housing" is intended to take a long-term view of the redevelopment of Vancouver, including Southcliff. This fails to take into account the problem of residential dwelling units burning down or otherwise being destroyed and the impact on property values of such designations. B. Redesignation of Properties Within Southcliff is Violative of Washington Law and Long-Established Covenants: Southcliff's Covenants contain restrictions only allowing single family dwellings on its platted lots. 1110, allowing for increased density on single family lots, does not apply to subdivisions whose covenants containing such limitations were in place prior to July 1, 2023.This particular covenant is imposed on all six phases of Southcliff. Staff has promulgated a creative argument that such limitations do not need to be recognized by local government but is rather an issue left to be dealt with by homeowners in the subdivision. Staff has also indicated that it will seek to have this retroactive limitation eliminated by the legislature. These two arguments are inconsistent at best. The City must deal with GMA as it currently exists for purpose of amending its comprehensive plans and zoning codes and its accompanying EIS. Viking Properties Inc, v. Holm, 155 Wash 2nd 112 (2005) is controlling authority here. That case involved resolution of an inconsistency between a neighborhood covenant providing for single family lots only versus a requested rezone for more density. In this Washington Supreme Court case, the covenant was upheld for a variety of reasons:	

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	1. The Court recognized that restrictive covenants are enforceable promises relating to the use of land. Here we have such a covenant. 2. The Court recognized that a public policy favoring higher densities as set forth in GMA conflicts with an existing restrictive covenant making it impossible to develop the property, causing a violation of any property owners' due process rights. Here, we have a legislative mandate for additional density on lots zoned for single-family use, with a covenant restricting more than one dwelling unit per single-family lot, resulting in a violation of due process; in order for the redevelopment of the properties in the manner the City proposes to occur litigation would be necessary to either clear title of the covenant or eliminate anything other than single-family zoning protected by such covenant. 3. The Court made it clear that, in order to find a restrictive covenant to be in conflict with a public policy, the record must demonstrate the legislature's intent to declare general public policy sufficient to override a contractual property right. Here, the legislature in 1110 promulgated a public policy to actually protect covenants applied to property prior to July 2023. 4. Recognizing that GMA applies prospectively in its ongoing application (influencing future planning decisions), it is not to be used to challenge prior planning decisions which created single dwelling, only lots from both the land use and covenant perspectives. 5. The Court also made the strong point that enforcement of restrictive covenants protecting private property rights actually enforces the goal of GMA relating to protection of private property rights, and indeed recognized restrictive covenants as valuable property interests, subject to takings claims when violated. Covenants imposed on all phases of Southcliff are imposed on this neighborhood not by an HOA, but rather the subdivisions' developer – the Vancouver Housing Authority ("VHA") – an instrumentality of and created by the City of Vancouver primarily for the contracted purposes resulting in the creation of the Southcliff Neighborhood. This covenant is a contract, enforceable under Washington law.	
BO	"""From: Michele Rudi Resident owner of: [address], Vancouver, WA 98661, Southcliff Neighborhood [email address] [phone number] Dear City of Vancouver, the Vancouver City Council, and the City of Vancouver Planning Commission. We have been residents in the Southcliff neighborhood since the Fall of 2004, going on 20 plus years. We had many options on where to move our family from Salmon Creek in 2003. However, we chose the Southcliff neighborhood for its location near work and school, large private lots, walkable streets, a local park, a safe neighborhood with minimal traffic, established landscaping and tree canopy, and the exclusive reputation that Southcliff has had since the 1950s and 1960s, when it was formed. When we moved in, we had original owners on either side of us, both of whom had been built in the 1950s. This is very common; people don't leave Southcliff. Our neighborhood was, and still is, known for being home to a large number of professionals, including doctors, lawyers, business owners, board presidents, school teachers, homemakers, philanthropists, pilots, restaurant owners, government officials, TV broadcasters, and the list goes on. Our neighborhood is hardworking, and it shows in the pride of ownership evident in the yards and homes of this established enclave, governed by its HOA and CC&Rs. We have a stable, historic neighborhood that serves and contributes back to its community. We rely on our CC&Rs to guide our neighborhood, ensuring that we can maintain the foundation and heritage that Southcliff was built upon. I write to you today to oppose the mixed-use and medium-scale housing that you are proposing to implement within the boundaries of the Southcliff neighborhood. These changes would severely impact our property values. It has been calculated that Southcliff property values total 80 to 100 million dollars. I think it is a reasonable question to ask: Will the city be compensating homeowners for loss in property value? These changes would add stress, traffic, and public safety concerns. Our per capita rate for officers is already the lowest in the state. We should have 3.2 officers per	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	every 1000 residents. Vancouver has only 1.2 officers per 1,000 residents. It seems that the priority to make our city safer and cleaner is an afterthought. We should not be adding density until the public safety problem is under control. The mixed and medium scale would add additional traffic and street parking to our quiet neighborhood. It would greatly change our single-family homes, with a minimum of 1800 square feet and a maximum of two stories in height. The changes you are proposing are prohibited by our Covenants, Conditions, and Restrictions (CC&Rs). It is my understanding that the Middle Housing Bill does not trump our current active and enforceable CC&Rs. I was also shocked to learn that the Tower Mall project has now been zoned as a regional activity center. Southcliff as a whole was opposed to the Tower Mall project. Change is unknown, and done without proper planning can result in negative outcomes. I, for one, was hopeful that Tower Mall could add some services to our area, but upwards of 1300+ housing units, with little parking, and now a building height that has no restrictions, is troublesome. I am also concerned that our arterial streets, such as Blanford Canyon, are not included in the plan to be updated to accommodate the increased traffic. Blanford Canyon historically has poor lighting, no sidewalks, or protected areas for walking or biking. Additionally, it connects to Old Evergreen Blvd, which was not updated for heavy traffic when the Rose Vista property was developed for mass-density housing. Don't get me wrong, I am for the Tower Mall project as long as it has components to fit in and blend with the Southcliff, Dubois, Buena Vista, and the surrounding neighborhoods in a respectful capacity. Allow medium-scale development, 3 to 5 stories tall, with ample parking, improve the road arterials, and increase the number of officers to improve public safety with increased density. My vote is for the No Action Alternative. Growth is inevitable, but growth that occurs too quickly without infrastructure and public safety at the forefront will only cause leadership to work backwards, chasing its tail, and never be able to get ahead of the problems that exponential growth brings. Thank you for your time and leadership. Sincerely, Michele Rudi """	
BP	"""To whom it may concern: My neighbors and I are very concerned! As a homeowner and resident in the historic Southcliff neighborhood in the Heights area of Vancouver, I am troubled to hear that our single family dwelling lots are slated to be rezoned throughout the neighborhood for various business and high-density housing uses. In my experience, city planning means careful consideration of a city's future needs and making a thoughtful plan to accommodate growth in a way that preserves beauty, livability, and sanity for the residents. It puts careful consideration into where the different types of structures should go, putting businesses in business districts, homes in neighborhoods, apartments in apartment blocks, etc., while protecting spaces for trees and animals, bushes and birds, as well as playgrounds and walking spaces. Such planning takes deliberate effort, but it makes sense if planners want residents to be healthy and happy and willing to make the city their home. The current plan proposed for historic Southcliff, and other neighborhoods throughout the city, appears to have missed this meaning of planning! In an effort to accommodate a large influx of new residents in the coming decades, a sweeping change of the current zoning of residential lots will haphazardly allow high density housing and businesses to be built in places current residents would never have dreamed of! Our neighborhood was developed in the 1950's. The lots are large and the streets are wide. No sidewalks, but a huge variety of large old trees and a vast array of little critters and birds. It's an old, quiet neighborhood with history and character, a uniquely quaint and peaceful slice of Vancouver. Most homes have copious driveways, so very few cars are parked on the roadways. This lends the neighborhood a safe and friendly feeling, inviting outside residents to join us here to enjoy a stroll, walk their dogs, and play with their kids in the park. The simplicity and wholesomeness of a bygone era can by tangibly felt here. It is a place to protect for the benefit of all!	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	One can only imagine how altered this peaceful historic neighborhood would be if even one of the old homes were transformed into a business or a high-rise multiplex. If such an event were to happen, it would be sure to create a destructive domino effect. The lots would go one after another, because residents here would lose something extraordinarily special, something they pledged to protect when they purchased their homes and agreed to the neighborhood's longstanding CC&R's. With this new threat of such an unexpected and undesirable event, residents such as myself are reconsidering value-enhancing investments in our homes and pondering selling out. Why bother making improvements if the homes will just be sold for development fodder? And if the neighborhood is to be violated in such a way, why should we stay to see it happen? Our neighborhood will be irrevocably damaged by the city's proposed rezoning. There are many reasons our Southcliff neighborhood should be protected from the new zoning. Tree coverage is a big one! Southcliff has the greatest tree coverage of any neighborhood in Vancouver at 47% and growing, while the city as a whole has just 19%. With Vancouver's overall goal of 28% by 2047, taking out our lovely old trees to build tall multiplexes would definitely be a step in the wrong direction. Our trees should be protected! Old trees like ours are far bigger than new development trees, providing much-needed habitats for otherwise endangered birds and other small animals, and working mightily to clean the polluted city air. Protecting these large trees is so important to the livability of our city! Allowing them to be destroyed in the name of high density housing and replaced with tiny saplings would be a travesty. Our environment must be cared for, even within city lines. No place better than here in Southcliff where we are already making a positive impact! And an important aspect to note regarding our trees: taking a peaceful stroll through our beautiful neighborhood will reveal that our trees are not all of one kind. The apparent diversity of our large trees is absolutely astounding! Each one is invaluable. This is not what you would find in a more modern development, with lines of trees of all the same sort. We have enormous regal evergreens as well as imposing old deciduous trees of so many kinds! They provide boundless beauty and so many animal homes. And those innumerable green leaves furnish us with fresh clean air as well as protective shade. To redevelop our neighborhood into high-rises would desecrate nature's presence here in our city. There are other concerning impacts that my neighbors will note regarding the proposed rezoning, such as excessive neighborhood traffic and on-street parking, watershed issues, loss of historic architecture, loss of privacy and safety, etc. But my greatest concern is the threat of destruction to this peaceful haven of a neighborhood, a neighborhood that helps make Vancouver a more livable and beautiful city. I realize that our city faces the pressure of increasing population and housing needs. But high-density housing types should be placed where they make good sense, not where they will destroy a well-planned historic neighborhood! And I might add here that the homes in our neighborhood are already large enough to accommodate more residents. For example, our home is currently occupied by 10 family members from 3 generations, and we have accommodated as many as 12. Another home just up the road is occupied by a large group of young adult housemates. The homes in Southcliff already have high density usage and potential. They can find their best uses without tearing them down and replacing them with multiplexes and businesses! Please, city planners, reconsider your "plan" with regard to Vancouver's historic neighborhoods like Southcliff. You would not consider rezoning Officer's Row would you? I would propose that Southcliff has similar historic value in Vancouver and should be protected for the city, for the trees, for the animals, and for the people city-wide. Please, protect Southcliff! Your consideration is greatly appreciated. Sincerely, Julianne Rogers [address] Vancouver, WA 98661 """	

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BQ	"To: Mayor Anne McEnerny-Ogle, Mayor Pro Tem Erik Paulsen, Councilmember Sarah J. Fox, Councilmember Bart Hansen, Councilmember Kim D. Harless, Councilmember Diana H. Perez, Councilmember Ty Stober, Rebecca Kennedy, Deputy Director, Community Development, Bryan Snodgrass, Principal Planner, Chad Eiken, Director, Community Development, SEPA Responsible Official, Meredith Herbst, Associate Planner, Community Development From: Christina (Chris) Parks, Realtor and Southcliff resident for 26 years Date: August 30, 2025 Subject: Our Vancouver - Comprehensive Plan 2045 To the Vancouver City Planning Team I am a professional Realtor with Windermere NW Living and a resident of Southcliff. I came to this special neighborhood with my husband 26 years ago, 6 months pregnant and with a one-year-old in tow and we loved raising our children here. We look forward to aging in place in our day-ranch home that allows one-level living with room for guests, a garden, a green house and long safe walks every morning and evening. I am writing to respectfully oppose Alternatives 1 and 2 of the proposed Comprehensive Plan revisions that would rezone parts of Southcliff from Low Density Residential to Medium-Scale or Mixed-Use. Key Concerns 1. Existing CC&Rs & Legal Precedents Southcliff has long-standing CC&Rs (in place since 1954 and updated periodically) that restrict additional construction on existing single-family lots. Under Washington's 2023 Middle Housing Act (HB 1110), CC&Rs established before July 23, 2023, remain enforceable. This interpretation of the Middle Housing Bill comes from the Washington Realtors' and its attorney —therefore, zoning changes here would face significant legal barriers and challenges for implementation. 2. Neighborhood Character & Property Values Southcliff's historic, mid-century character—with large lots, mature trees and iconic tree canopy and rhododendrons, wide streets, park and larger single-family homes—has strong market value and community identity. High-density or mixeduse development would irreversibly alter this and likely decrease property values. 3. Traffic & Safety Southcliff was designed as a low-traffic, pedestrian-friendly neighborhood with no sidewalks and wide, curving streets. Increased density and mixed-use development would add traffic, on-street parking, and safety hazards for walkers, cyclists, and children. 4. Environmental & Urban Forestry Impacts Southcliff has one of Vancouver's highest tree canopies (47%) and serves as a critical green corridor. Increased density would lead to canopy loss, strain the Blandford Canyon watershed, and undermine the city's urban forestry goal of reaching 28% canopy by 2030. Requests • Remove Mixed-Use and Medium-Scale designations from Southcliff. • Redirect density goals to more suitable corridors (E. Mill Plain, Fourth Plain and Evergreen Boulevards) where redevelopment would increase property values and community vibrancy. • Require planners and consultants to visit and walk proposed impact areas before advancing plans to confirm viability. • Engage citizens earlier in the planning process rather than only during the Environmental Impact Statement phase.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

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	Constructive Alternatives • Focus medium-scale and mixed-use zoning along Mill Plain Boulevard and Fourth Plain Boulevard where underutilized lots, commercial parcels, and vacant/underutilized properties exist (e.g., old golf driving range, unused cemetery section, Fircrest apartments, vacant commercial spaces near Safeway, small homes as massage parlors, spa and psychic, etc.). • Refine density and affordable housing goals within the Heights District and Evergreen Boulevard corridor, which are already positioned for growth. • Work with real estate, legal professionals (e.g., Washington Realtors legal counsel) and developers to ensure that new zoning proposals respect existing CC&Rs and practical development constraints (e.g., PUD power line easements, traffic safety, tree canopy/watershed challenges). Closing The City of Vancouver faces a significant challenge in meeting future growth goals, but rezoning Southcliff is not the solution. It would bring lasting harm to an established, historic neighborhood without meaningfully advancing the city's housing and job targets. I urge you to collaborate with residents and professionals to identify locations where increased density will enhance—not diminish—Vancouver's quality of life. Respectfully, Chris Parks Realtor, Windermere NW Living 26-Year Southcliff Resident"	
BR	"""Greetings, My name is William Rogers, and I live at [address] in the Southcliff neighborhood. In reviewing the zoning change proposals put forth in the City's Draft EIS, several serious concerns have come to mind. My concerns are motivated by a desire for livability, vitality, inclusion, public health and safety, and the preservation of cultural and natural resources in the city of Vancouver. The Southcliff neighborhood contributes to all of these factors for the city of Vancouver. I would like to point out some ways in which the City's Draft EIS degrades or detracts from these goals in the hope that revisions can be made to preserve what is good about Southcliff. I located my family in the Southcliff neighborhood in 2011 for its quiet, walkable streets and large, majestic, and diverse trees. The urban canopy in the Southcliff neighborhood is second to none in the city, providing 47% tree coverage per the 2021 survey, up from 45% in the 2011 survey. We see nature in our park, backyards, and on the streets. Animals thrive, with deer, rabbits, squirrels, and other wildlife making Southcliff and the surrounding green space their homes. The diversity of trees, including oak, maple, birch, sycamore, redwood, conifer, pine, fruit trees, and many mature ornamental tree, makes Southcliff valuable. This diversity supports many types of birds—not just hardy urban landscape species, but delicate wilderness species as well. Where animals and birds thrive, adults and children thrive. Many people beyond Southcliff homeowners enjoy walking, cycling, and jogging through Southcliff, finding it a peaceful retreat in the city. The park hosts guests from the adjacent neighborhoods, making Southcliff not just a jewel for a lucky few, but also something precious to steward and share with others. Southcliff neighbors are inclusive and welcoming. I desire to see the character of the Southcliff neighborhood preserved as a model to study and learn from. While not all attributes of Southcliff can be replicated in every neighborhood, as a historic mid-century modern neighborhood, it maintains a unique collection of features worth studying and preserving as a reference for city planning. The Southcliff neighborhood was established in the 1950s, with CC&Rs dating back to 1954. These CC&Rs allow for one single-family dwelling per lot of no more than two stories high and thus are violated by Alternatives 1 and 2 as currently proposed. Therefore, I stand opposed to both alternatives.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	The proposed alternatives allow the addition of commercial and mixed-use buildings to our neighborhood. Such projects would mean the elimination of mature trees and would degrade the neighborhood's ability to support wildlife. They would increase cars parked along streets and reduce the walkability of the neighborhood. Cycling and jogging would be less safe and less convenient. I support urban growth and understood that the Heights District redevelopment is to be where commercial and mixed-use high-rise buildings are to be built. If the City needs more density, please add it to the Heights plan and not to Southcliff. Access to commercial and mixed-use high-rises would not be from Mill Plain but rather from our neighborhood streets, creating huge congestion on those streets—not to mention safety issues for pedestrians and cyclists. I am concerned that limited access to Southcliff due to roadways and terrain would mean only a limited buildout of mixed-use development, which would result in destroying the character of the Southcliff neighborhood while providing minimal benefit to the city. For these reasons, I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Instead, I encourage the City to preserve the qualities that make Southcliff a living example of what a thriving, sustainable, and inclusive neighborhood can be: quiet and walkable streets, a diverse and flourishing tree canopy, safe spaces for recreation, and a welcoming community spirit. Protecting Southcliff is not just about safeguarding one neighborhood—it is about keeping alive a model of livability and stewardship that benefits the entire city of Vancouver. Sincerely, William Rogers [address] """	
BS	"To the City of Vancouver, 9/4/25 I understand that the city of Vancouver is required to update and propose a new plan for growth and development. This sounds good, but the plan as proposed makes no sense for the Southcliff neighborhood that we have lived in for 20 + years.The drafted EIS would establish a mixed use Neighborhood along Millplain Blvd, allowing 3 to 8 story buildings, including apartments and a ground floor retail office space. Also proposed is a Medium Scale Neighborhood for Oregon Drive and Umatilla street. We do not want buildings 2 to 5 stories high with commercial spaces.These changes would cause a dramatic increase in traffic and parking issues to the sleepy streets of Southcliff that are walked by many everyday, all day. These proposed changes violate the longstanding covenants of the Southcliff Neighborhood that mandate single family residential use. These proposed changes will also destroy the historic character of the neighborhood. The changes will destroy the relatively safe and quiet environment that we currently live in, walk in and enjoy. Our neighborhood is also enjoyed by other individuals who don't live in our neighborhood but come into it to walk our safe streets and enjoy the beauty of it. Rather than rezoning parts of Southcliff as ""Mixed - Use Neighborhood"", please consider new commercial development in the adjacent Town Plaza, Regional Activity Center. This creates a successful business district needed to help businesses thrive, it aligns with City goals for economic hubs, and protects our beloved quiet Southcliff neighborhood for all to enjoy. We the people of Southcliff do not want this! Sincerely, Jon & Teri Spassov Home owners and residents of Southcliff"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
BT	Kauffman Center: TAX LOT #'s: [tax lot number], [tax lot number], [tax lot number], [tax lot number], [tax lot number], [tax lot number].	Comment noted.

ID	Full comment	Response
BU	"Dear Meredith, Mayor and City Council Members, Objection to the Proposed Zoning Changes to Southcliff Neighborhood September 4, 2025 My name is Rudolph Munzel, I am the owner (through my company R.E.H.A.M. 7, LLC) of the property at [address], Vancouver, Washington (in the Southcliff Neighborhood). I have reviewed the zoning changes proposed in the City's Draft EIS. I am in opposition to adoption of both Alternative 1 and Alternative 2 as currently proposed. My two main objections, amongst others, are that: 1) It will destroy a Historically rare example of Vancouver's early Mid Century Modern Architectural Heritage. 2) It will destroy unique quite, walkable streets with a beautiful mature tree canopy that cannot be reproduced again close to the downtown area. Although I understand the need for more density in Vancouver I also know that these changes need to be made with care not to destroy unique areas of Vancouver that can never be replaced – the Southcliff neighborhood is one such area. This neighborhood has an irreplaceable Mid-Century Modern character that grew in the 1950s and 1960s that cannot be replaced. It has a charm and maturity that also cannot be replicated. Imposing the proposed Zoning Changes would be heavy handed and ignorant of these unique qualities. A carefully implemented density strategy would identify areas that give Vancouver it's special character by maintaining Historically important and special places while increasing density in less historically and important areas. If this strategy is not taken then the result will be a homogeneous, depressing city that has no unique qualities compared to other cities. This would be a self-imposed disaster that is avoidable. Please take care in your planning decisions and choices to keep the special areas that make Vancouver a place that future generations and businesses are inspired to move to and develop. Please do not handle every area of our City in a homogeneous manner that will ruin it for the future. The Southcliff Neighborhood is one such jewel, don't destroy it. Sincerely, Rudolph Munzel [address] [phone number] "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
BV	"To Our City Officials: We are residents of the South Cliff neighborhood, residing at [address]. We are aware of the proposed zoning change proposals set forth in the City's draft EIS which would impact the neighborhood. We are against the adoption of both Alternative 1 and Alternative 2 as currently proposed. Our reasons for opposing these alternatives are set forth in, and we would greatly appreciate your review and consideration of, the attached letter. With respect and appreciation for all you do— Sincerely, Bill and Lori Thayer [phone number] (Bill) [phone number] (Lori) "	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
BW	"City of Vancouver Attn: Meredith Herbst	The City is in receipt of this comment about consistency between growth projections used by the City of Vancouver inside city limits and the growth projections for this area formally allocated by Clark County. As noted, the City of Vancouver is assuming proposed zoning designation inside city limits will yield slightly

ID	Full comment	Response
	City Hall PO BOX 1995 Vancouver, WA 98668 RE: City of Vancouver Draft Environmental Impact Stateme Thank you for the opportunity to comment on the Draft Environmental Impact Statement. Per RCW 36.70A.115 (1): Counties and cities that are required or choose to plan under RCW 36.70A.040 shall ensure that, taken collectively, adoption of and amendments to their comprehensive plans and/or development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth, including the accommodation of, as appropriate, the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, as adopted in the applicable countywide planning policies and consistent with the twenty-year population forecast from the office of financial management. Based on Office of Financial Management's population projection the County Council adopted a 20-year population target for 2045 of 718,154 (RES2023-05-03). Based on the 2045 population number the countywide total number of housing units and jobs needed for growth between 2023 and 2045 are 103,695 housing units and 88,100 jobs. The portion of growth allocated to the City of Vancouver per RES2024-05-05 is for 36,527 housing units and 26,317 jobs. The number of new housing units(38,129) and new jobs (43,198) the City is planning for, as cited on page 2 of the DEIS, are not consistent with the allocation made to the City of Vancouver in RES2024-05-05. As the city proceeds to the preferred plan, these figures will need to be reconciled to be consistent as required in RCW36.70A.100. Sincerely, Oliver Orjiako Community Planning Director"	higher amounts of residential growth than allocated by Clark County, and more significantly higher levels of employment growth than allocated. The City is in compliance with RCW 36.70A.115 requirements that it provide sufficient land to accommodate allocated growth. RCW 36.70A.100 more generally requires coordination and consistency on planning issues between jurisdictions sharing a border or common regional issues. GMA Hearings Boards have generally defined interjurisdictional consistency not as requiring identical approaches, but rather as requiring compatible approaches where one jurisdiction's approach does not thwart the other. The differences in technical opinion stem from different capacity estimate methodologies over how much growth the zoning designations within the City of Vancouver will produce during the planning period. RCW 36.70.A.110 and 36.70A.215 envision some level of jurisdiction-specific choices. Most importantly, the higher growth estimates used by the City of Vancouver within its city limits for its internal planning purposes do not prevent Clark County or other jurisdictions from zoning more or less land for residential or commercial purposes within the Vancouver UGA or beyond. The higher growth estimate methodology used by the City of Vancouver reflects technical concerns about the accuracy of the Clark County Vacant and Buildable Lands Model, particularly as regards employment. The 2020 advisory committee process which updated the VBLM focused primarily on residential capacity assumptions, with far less time devoted to employment, and the committee process was halted before all employment recommendations could be provided. As a result, the VBLM has retained many outdated employment assumptions which significantly underestimate overall capacity. The VBLM for example assumes home based work throughout Clark County will only account for 4% of job growth during the 20-year planning period, when the Clark County Draft Environmental Impact Statement for this Comprehensive Plan update reports that the current actual number Clark County number is 16%, and economists at the Washington State Employment Security Department (WESD) are on record as projecting that 20% of future Clark County job growth would be work from home. The VBLM also assumes there will be little to no job growth for the next 20 years through redevelopment of existing buildings, or job growth through more filling up of existing buildings. The City's technical concerns with the Clark County VBLM are well documented in the County record.
BX	"September 5th, 2025 Attn: Meredith Herbst Community Development, City of Vancouver City Hall PO Box 1995 Vancouver, WA 98668 Submitted via email: OurVancouver2045@cityofvancouver.us Dear Meredith Herbst: The Port of Vancouver, USA (the Port) respectfully submits these recommendations and comments on the Draft Environmental Impact Statement (EIS) issued by the City of Vancouver (City) on July 8, 2025, under the State Environmental Policy Act (SEPA) for the Our Vancouver Comprehensive Plan 2045. The comments are provided pursuant to Washington Administrative Code Section 197-11 and the City's public comment period. Our comments and recommendations are offered to support a balanced approach between the City's housing and job growth objectives and safeguarding long-term development opportunities and continued use of industrial land at the Port. The Port is a global hub of opportunity positioned at the crossroads of river shipping, interstate and national rail lines. Moving over 7 million tons of cargo annually and home to 50 industrial tenant businesses, we are a strategic industrial gateway to the US, Canada, Asia, and Central and South America.	The City appreciates the Port of Vancouver's participation in the Comprehensive Plan and Vancouver Municipal Code Title 20 Development Code update process, both prior to publication of the DEIS and on drafts of the Plan and Code, including specific input on development regulations in the Heavy Industrial zoning district. The proposed updated Comprehensive Plan Land Use and Development, Economic Opportunity and Transportation and Mobility Chapters reflect engagement with Port of Vancouver staff to align goals and policies in support of building and maintaining a thriving economy that meets the needs of community members and reflects changing regional and global economic conditions. The City appreciates the Port of Vancouver's participation in the Comprehensive Plan and code update process, including specific input on development regulations in the Heavy Industrial zoning district. As described in Chapter 2 of the Final EIS, the proposed Preferred Alternative would preserve Light and Heavy Industrial areas in and around the Port of Vancouver and in many areas throughout the City to ensure future capacity for employment. The updated zoning code reflects Port feedback on maintaining flexibility for employment uses while modifying some regulations that are no longer needed, and providing flexibility for industrial users and options for mitigating impacts. Relevant proposed Comprehensive Plan Update goals and policies are referenced in the avoidance, minimization, and mitigation measures for the Land and Shoreline Use and Transportation sections of Chapter 3 of the Final EIS. These goals and policies include:

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	The Port's mission is to "provide economic benefit to our community through leadership, stewardship and partnership in marine, industrial and waterfront development." The City's Comprehensive Plan Update "Our Vancouver" will provide the blueprint for growth and development through 2045 and will influence the long-term health, livability, and economic prosperity of the entire community, including the Port. The Port's mission statement aligns with the City's vision for economic opportunity, as documented in the Goal Framework developed for Our Vancouver: "Support Business and Industry, Job Growth, Facilitate Startups and Innovation, Resilient Green Economy, Equitable Access, Wealth Creation, Access to Childcare." The values shared by both the Port and the City include maintaining and preserving industrial employment hubs, supporting infrastructure for industrial growth, creating high quality jobs, and providing middle to high-wage jobs. The City has consistently recognized the importance of the Port as an essential stakeholder to position the City as a West Coast leader in industrial, employment, and waterfront-related uses and operations. The Port appreciates the City of Vancouver for their outreach to date and this opportunity to comment on the SEPA Draft EIS. As a national leader in marine and industrial commerce, and a key economic anchor for the community and region, the Port can provide a unique perspective and insights on how to achieve the community's vision. The Port looks forward to working with the City as this important plan progresses from development to implementation and would like to offer our ongoing support and assistance. Alternatives The Port concurs with the City that the No-Action Alternative does not adequately meet the current and future needs of the City and community and would not support the necessary population growth and employment opportunities. The Port looks forward to continuing its collaboration with the City to identify a Preferred Alternative that best serves the long-term needs and interests of our community. The Port believes the Preferred Alternative should include opportunities for light and heavy industrial business and employment growth supported by wellconnected road, rail and shipping infrastructure and utilities. The Port requests that the City's Preferred Alternative preserve the use and flexibility of light and heavy industrial-zoned properties, particularly marine industrial lands that have made substantial investments in modernizing berths and/or have the potential to facilitate regional economic opportunities. Preservation of existing, vacant, and underutilized employment and industrial lands is essential to job preservation and creation, and long-term economic prosperity for the Port, the City of Vancouver, and the region. Land Use – Zoning of Port Property The Port supports the proposed increase in employment density, specifically in the proposed Industrial/Employment zone. This increase aligns with the shared goals of the Port and the City to promote and preserve local jobs, diversify employment opportunities, and strengthen Vancouver's position as a key local, regional, and West Coast economic hub. The Preferred Alternative should provide for flexibility in the permitted uses and standards within the Heavy Industrial and Industrial/Employment zones. This flexibility will help ensure that businesses operating at the Port can remain responsive to evolving market trends through and beyond the 2045 planning horizon. The Port understands the City intends to develop and adopt a form-based code for implementation of the Our Vancouver plan, which would guide the physical form and appearance of the built environment. The Port requests the City directly engage the Port during early discussions and development of the code for all zones on or abutting Port properties. This includes (but is not limited to) the Heavy Industrial, Industrial/Employment, Regional Activity Center, Medium Scale Neighborhood, and Mixed-Use zones. Close coordination between the City and the Port will help ensure the specific language in the Comprehensive Plan and code update is aligned with the Port's long-term goals and operations, and is supportive of the City and Port's shared interests in expanding economic opportunities in the city. the community's vision. The Port looks forward to	Goal LU-2 Preserve and Invest in Employment Land and associated policies in the Land Use and Development element identifies preserving and investing in employment land to sustain a strong economic base, provide access to middle and high wage jobs, and support community stability and long-term opportunity as City priorities. Goal EO-3 Thriving Economy and Industries and associated policies in the Employment Opportunity element articulates how the City will work to attract new businesses and industries, foster innovation and entrepreneurship, support local businesses, leverage new technologies and provide infrastructure and resources to help growth the economy. Goal TM-3 Efficient Freight Access and associated policies in the Transportation and Mobility element prioritizes freight access and mobility to safely and efficiently move goods, support economic growth, minimize environmental impacts and ensure long term resiliency. The proposed updates to Vancouver Municipal Code Title 20 Development Code provide updated landscaping requirements for redevelopment of existing industrial sites and buffer requirements between industrial and residential uses. City standards and policies for low-stress transportation facilities and connected networks reflect the need for appropriate separation between pedestrian and bike and small mobility infrastructure and vehicle and freight traffic to ensure safety and comfort for all users, and are intended to reduce conflict points so that freight mobility is preserved and enhanced while also ensuring safety for vulnerable road users. The City recognizes and appreciates the long and ongoing partnership with the Port of Vancouver to maintain, preserve and enhance industrial land and employment opportunities in the community, and the Port's central role in building an economy that works for everyone. The City commits to continuous and proactive engagement and coordination with the Port now and in the future when updating policies and codes to ensure regulations align with the needs and long-term plans of local businesses and employers.

ID	Full comment	Response
	working with the City as this important plan progresses from development to implementation and would like to offer our ongoing support and assistance. Alternatives The Port concurs with the City that the No-Action Alternative does not adequately meet the current and future needs of the City and community and would not support the necessary population growth and employment opportunities. The Port looks forward to continuing its collaboration with the City to identify a Preferred Alternative that best serves the long-term needs and interests of our community. The Port believes the Preferred Alternative should include opportunities for light and heavy industrial business and employment growth supported by wellconnected road, rail and shipping infrastructure and utilities. The Port requests that the City's Preferred Alternative preserve the use and flexibility of light and heavy industrial-zoned properties, particularly marine industrial lands that have made substantial investments in modernizing berths and/or have the potential to facilitate regional economic opportunities. Preservation of existing, vacant, and underutilized employment and industrial lands is essential to job preservation and creation, and long-term economic prosperity for the Port, the City of Vancouver, and the region. Land Use – Zoning of Port Property The Port supports the proposed increase in employment density, specifically in the proposed Industrial/Employment zone. This increase aligns with the shared goals of the Port and the City to promote and preserve local jobs, diversify employment opportunities, and strengthen Vancouver's position as a key local, regional, and West Coast economic hub. The Preferred Alternative should provide for flexibility in the permitted uses and standards within the Heavy Industrial and Industrial/Employment zones. This flexibility will help ensure that businesses operating at the Port can remain responsive to evolving market trends through and beyond the 2045 planning horizon. The Port understands the City intends to develop and adopt a form-based code for implementation of the Our Vancouver plan, which would guide the physical form and appearance of the built environment. The Port requests the City directly engage the Port during early discussions and development of the code for all zones on or abutting Port properties. This includes (but is not limited to) the Heavy Industrial, Industrial/Employment, Regional Activity Center, Medium Scale Neighborhood, and Mixed-Use zones. Close coordination between the City and the Port will help ensure the specific language in the Comprehensive Plan and code update is aligned with the Port's long-term goals and operations, and is supportive of the City and Port's shared interests in expanding economic opportunities in the city. Land Use – Increased Density at Adjacent Properties and Compatibility with Port Operations As surrounding communities pursue greater density and building heights under the proposed alternatives, the Port requests the opportunity to proactively collaborate with the City to identify and address potential compatibility challenges. We are particularly interested in working with the City on the proposed "regulations that provide transitions between zoning districts to ensure compatibility" (pg. 57 of the Draft EIS). The formbased code and proposed transition regulations will need to support feasible, flexible buffers between Port operations and adjacent uses—without compromising the Port's current or future viability. Given the Port's unique operational context, our input is essential to ensuring compatibility where industrial uses interface with emerging residential or mixed-use development. The Vancouver Waterfront offers a strong local example of how thoughtful design and building standards can balance industrial needs with new residential and mixed-use development. We also request that the Final EIS include a more detailed evaluation of potential land use incompatibilities between zoning districts, especially in areas where higher-density or mixed-use zoning is proposed near the Port or other	

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	industrial areas. Proactive planning will be key to mitigating future conflicts related to noise, lighting, and freight traffic. The Port requests that the City include mitigation measures in the Final EIS to ensure new residential developments and other sensitive uses are designed to prevent conflicts with existing industrial areas. At present, most of the regulations to minimize off-site impacts in the Vancouver Municipal Code (VMC) are intended to reduce impacts from new development, but do not address how new developments should be designed to avoid on-site impacts from the permitted use of adjacent areas. Some of the mitigation measures that the City should consider include, but are not limited to: - Use transitional zones or step-downs in building height for proposed residential developments and other sensitive uses adjacent or near to industrial areas to minimize visual and/or auditory impacts. - Develop site design, landscaping, and building standards for residential developments and other sensitive uses proposed adjacent or near to industrial areas, such as sound proofing structures and windows. - Develop and implement anti-displacement strategies for industrial uses in Vancouver to protect the long-term viability of local jobs. Future Development of Policy and Code Language The Port asks that the City continue to proactively coordinate with the Port and other business leaders when updating policies and code, ensuring that Comprehensive Plan policy language and regulations align with the needs and long-term plans of local businesses. The business consequences, and help craft policies that support local industries, job retention, and the City's long-term economic goals. Early review and input from local business leaders will clarify how new standards could affect long-term activities and offer suggestions to balance housing needs and environmental protection with industrial requirements. The City's business leaders working group is a key opportunity to obtain input on the proposed form-based code, minimizing incompatibility between uses through transitional zone requirements and design standards, and ensuring heavy industrial/light industrial uses and regulations remain flexible and responsive to current and future market demands. Transportation - Freight Mobility The Port supports the proposed policy to "Designate and enhance freight corridors to facilitate efficient movement of goods and reduce congestion. Improve infrastructure and connectivity to and from the Port of Vancouver to streamline freight operations" (pg. 105 of the Draft EIS). As a recognized national and regional leader in high/wide/heavy freight movement, freight corridors are essential to Port operations. Two key priorities are preserving Mill Plain Boulevard as a designated freight corridor and improving access via the Fruit Valley route. While Mill Plain Boulevard presents some limitations due to its narrow width, it remains a vital west-east connection for the Port's freight operations. The Port appreciates the City's efforts to date on the Fruit Valley Freight Access and Safety Improvements, and requests that the City continue to progress design and funding for this important project. The Port also supports the City's goals for a citywide multimodal transportation system and looks forward to continuing to improve and integrate the Port's SR 501/Lower River Road Multi-Use Trail with other planned improvements in the city for people who walk, bike, and roll. The Draft EIS notes that "The City works to integrate design and policy treatments so freight and vulnerable users can navigate the same streets" (pg. 90 of the Draft EIS). While "vulnerable users" is not defined, the Port assumes the City is referring to active transportation users. The Port would like to note that, in some cases, physical separation of freight and active transportation is necessary and a common best practice for creating a safe and functional multimodal system.	

ID	Full comment	Response
	The City should continue to work with the Port to ensure that freight mobility needs are taken into consideration when designating and designing multimodal facilities. The needs and requirements of freight traffic (e.g., turning movements and freight load sizes) are important considerations for multimodal mobility. Equity and Social Vulnerability; Health Impact Assessment The Port supports the City's efforts to integrate equity into planning processes. These efforts align with the Port's own initiatives to reduce inequality—such as the Port's education and workforce development programs, the Community Fund Program, and various projects to improve air and water quality and climate resiliency. "	
BY	VIA EMAIL (OurVancouver2045@cityofvancouver.us) Meredith Herbst City Hall P.O. Box 1995 Vancouver, WA 98668 RE: HP Inc.'s Comments on the Our Vancouver Our Future 2045, State Environmental Policy Act Draft Environmental Impact Statement Dear Ms. Herbst, This office represents HP Inc. ("HP") as local land use and real estate counsel advising on the company's development activity in Vancouver's Section 30. HP is currently constructing its first research and development and office building consistent with the City of Vancouver – HP Inc. Development Agreement ("HP Development Agreement"). The HP Development Agreement currently covers approximately 98 acres located at 18208 SE 1st Street, Vancouver, WA. Please accept and consider these comments on the Our Vancouver Our Future 2045, State Environmental Policy Act Draft Environmental Impact Statement (the "DEIS"). Please include these comments in the record. At this time, the City of Vancouver ("City") DEIS does not adequately address the existing conditions and impacts of the potential alternatives. HP is concerned that the DEIS uses broad conclusions about potential impacts from the two alternatives and formulaic responses to address and mitigate environmental impacts by an over-reliance on incremental development without assessing the likely environmental impacts that will result from the proposed Comprehensive Plan. HP's specific concerns are set forth below. I. The DEIS inadequately address the incompatibility of land uses as related to impacts resulting from the Regional Activity Center Zone. Alternative 1 shows Section 30 as zoned mostly Mixed Use and surrounded by the Regional Activity Center ("RAC") zone to the south. DEIS, p. 26. In assessing the impacts of Alternative 1, the DEIS states, "Alternative 1 would have a modestly higher potential for incompatibility between existing land uses compared to the No Action Alternative, as it would accommodate denser and more intense building types and growth, and a greater mix of residential and commercial land uses, in more areas of the city." DEIS, p. 55. The DEIS's description of incompatibility does not address the mixed use designation in Section 30 and associated impacts based on known approved uses, including mostly low-density housing development in the northern portion of the section. Further, the overall statement of denser and more intense building types does not give enough detail about the impacts of a RAC to HP's employment-focused development and to housing anticipated in Section 30. The impacts associated with extreme traffic, noise, and other environmental impacts that could occur with the RAC zone designation are not given enough attention. This is true when reviewing the DEIS as a holistic document, where incremental development is used as a justification to not consider the overall impacts of the significant impacts that are known and anticipated under the RAC zone.	The proposed Preferred Alternative as documented in the Final EIS assigns Institutional/Campus zoning to portions of Section 30 that include HP properties, reflecting ongoing collaboration between the City and HP to more appropriately align zoning with current and planned future investments at the HP Campus. This approach modifies the previous proposed application of Mixed Use Neighborhood and Regional Activity Center zoning districts to these areas that was documented in the Draft EIS. The Final EIS analysis reflects updated modeling of future citywide transportation impacts of the proposed Preferred Alternative, using the Regional Transportation Council Regional Transportation Model. The Final EIS acknowledges that all alternatives have the potential to create impacts to existing transportation infrastructure as a result of expected population and job growth and development, with greater potential impacts under Alternatives 1 and 2 and the Preferred Alternative than the No Action Alternative. Metrics used to assess potential transportation impacts were multimodal and included vehicle miles traveled, level of mode shift, and mobility units. Environmental analysis at the nonproject stage is typically less detailed and is intended to form the basis for future environmental reviews and permitting processes for specific projects. The anticipated changes to the transportation system would occur incrementally, and with the implementation of avoidance, minimization, and mitigation measures, no significant unavoidable adverse impacts to transportation are anticipated for any of the alternatives. Future growth and associated increased demand for transportation facilities will be addressed as part of the City's regular capital project planning efforts and updates to its six-year Transportation Improvement Program, as well as through relevant proposed Comprehensive Plan Update goals and policies. Refer to the Transportation section of Chapter 3 of the Final EIS for more information about potential impacts related to the Preferred Alternative and proposed avoidance, minimization and mitigation measures. The Public Facilities and Services element in the Comprehensive Plan and associated Capital Facilities Plan that lists planned capital facilities projects for six and 20-year time horizons are mandatory components of the City's Comprehensive Plan periodic review update. The Public Facilities and Services chapter identifies existing City capital facilities and services, existing capacities and likely future demands, level of services standards, planned future investments and costs, and funding sources for these future investments. The Capital Facilities Plan provides detailed project lists for the 1-6 year and 7-20 year planning periods for all required facilities and services including wastewater, water, surface water, solid waste, fire and emergency services, police and public safety, transportation, parks, recreation and cultural services, and general government facilities that serve multiple service areas like the new City operations center and City Hall, among others. These components meet the requirements for capital facilities and service planning under the Growth Management Act and relevant state statutes. The City is not required to forecast future capital facilities needs for electricity or energy demand under the GMA because it does not own or operate these utilities, but the Capital Facilities and Services element does reflect coordination with energy provides who have confirmed their ability to meet energy demand associated with the proposed Preferred Alternative.

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	Alternative 2 designates most of Section 30 as RAC. DEIS, p. 29. Similar to the impacts analysis above in relation to Alternative 1, the impacts of the RAC designation on the HP property and other Section 30 properties are not fully assessed against this intense designation. No effort is made to address whether RAC is a compatible use to employment development on the HP property or whether generally low-density housing would be approved along the northern portion of Section 30. In addition, while the general description of impacts acknowledges that eastern Vancouver would be one of the most impacted areas under Alternative 2, the DEIS does not acknowledge the actual or potential impacts from the RAC zoning. DEIS, p. 56. As with Alternative 1, the Alternative 2 analysis is based on a false premise that the entire Section 30 would develop as a RAC, when the most recent approvals in Section 30 include generally low-density housing to the north of HP's property and employment uses on the HP property, including both pre-annexation development agreements ("PADAs") and the HP Development Agreement would be highly unlikely to redevelop over the life of the Comprehensive Plan update. All of these agreements will limit the ultimate redevelopment and development within Section 30. The DEIS should be supplemented to more accurately represent the anticipated pattern of development within Section 30 in order to assess the amounts of housing and jobs to be developed in this area, and to assess the full range of impacts from the RAC zone to properties within Section 30 that will be developed pursuant to approvals under the PADAs or other existing development agreements. II. The DEIS inadequately addresses transportation impacts. As the City is aware, RCW 36.70A.070(6) requires that the Comprehensive Plan update forecast multimodal demands and needs within the City for at least ten years and identify state and local system needs to equitably meet the current and future demands. HP retained TENW to peer review the transportation section of the DEIS. See Attachment 1. The TENW memorandum methodically outlines the shortfalls in the DEIS including, but not limited to: • Failure to assess multimodal level of service standards; Inadequate analysis of the zoning designations in the alternatives and their impacts to the transportation network and the required comparison between alternatives based on those impacts; and • Inadequate assessment of transportation improvements to mitigate impacts. Therefore, the DEIS does not include the necessary analysis required under SEPA or the GMA. For all these reasons, the overall conclusion in the DEIS that there are no significant unavoidable adverse impacts to transportation anticipated for any of the alternatives is not supported. Further, the public is foreclosed from full participation because the DEIS did not fully assess transportation impacts. A supplemental EIS should be issued with a comment period once the required analysis to address all transportation impacts is complete, or the DEIS should be reissued for additional comment after the analysis is performed. III. The DEIS inadequately addresses Energy Utilities as a Public Service. The DEIS contains only a terse review of energy infrastructure and plans to expand the same to accommodate future growth. DEIS, p. 127. In that narrow discussion, the DEIS includes conflicting information. Relying on Clark Public Utilities' ("CPU") planning documents, the DEIS states that, "In their 2024 Integrated Resource Plan, CPU forecast that sufficient energy resources are available to meet customer demand through 2035; however, there is already a deficit in energy capacity, which is expected to grow through 2044. (CPU 2022)." Id. (Emphasis added). This acknowledged deficit deserves more and necessary attention and analysis in the DEIS. As shown in the attached memorandum from HP's energy consultants, PAE, HP's first building under construction and future buildings could take a significant portion of the existing and planned CPU energy load in the early years (upwards of 75% of CPU's expected new load in 2026) assessed in the Integrated Resource Plan ("IRP"). Attachment 2. As PAE describes, it is unclear whether HP's demand could result in a shortfall of energy supply and delivery for the company's development authorized in the HP Development Agreement; or for other users over the planning horizon. Further, if a short term energy supply problem occurs, then there is no ability to accurately assess or rely on "long-term planning" as a panacea in the DEIS for addressing the impacts of existing and	

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	future energy demand both by known users and other planned for but unidentified users under the alternatives examined in the EIS. Given the foregoing, the conclusions regarding consistency with Capital Improvement Plans at DEIS, pp. 135 and 137 are unsupported. The IRP anticipates a deficit of energy supply over the planning period. Further, the DEIS relies on formulaic answers to impacts to public services from Alternatives 1 and 2 at DEIS p. 136-137 that are also unsupported. The overall call for long-term planning as a mitigation measure is not adequate to address known environmental impacts. No understanding of the electrical supply or location of expanded facilities for energy have been discussed or disclosed. Attachment 2. Without any supporting evidence identifying mitigation through an open-ended term phrased as "long-term planning" is inadequate. The public, including HP, deserve full disclosure and analysis about the impacts to the provision of energy supply and related infrastructure now in the DEIS process. The failure to consider HP's employment-focused development on energy supply and infrastructure is a significant impact that has not been assessed in the DEIS. This failure also highlights that the energy capacity deficit already anticipated is going to be potentially more significant and must be assessed. Now is the time to do this assessment and supplement the DEIS to anticipate and coordinate the energy demand needs of HP's development, as well as the significant growth in housing and jobs anticipated by the DEIS and the comprehensive planning effort. At this point, the DEIS is doing a disservice to the public and the coordinated efforts among various provider agencies, like CPU, by failing to fully assess impacts under WAC 197-11- 600(3)(b) and RCW 36.70A.070(3). A supplemental EIS with comment period should issue once the required analysis to address all energy impacts is complete, including, but not limited to, a forecast of the future needs for capital facilities, proposed locations and capacities of such facilities, an ability to meet existing, known future demand, and energy needs for the alternatives in the DIES; or the Draft EIS should reissue for additional comment after the analysis is performed. IV. Cumulative effects cannot be fully assessed. Since the DEIS is deficient in its analysis of the land use differences between Alternatives 1 and 2; the transportation impacts; and the energy utilities deficit, the DEIS conclusion that cumulative effects can be addressed through regulatory changes is inadequate. The City is trying to kick the can down the road without the supporting analysis required under SEP A. Finally, given the insufficient analysis in the DEIS, it is difficult to see how the public should comment on alternatives for the Comprehensive Plan or how the City Council can be meaningfully informed in choosing an alternative. The City Council should not choose an alternative until the SEPA analysis requested herein is complete.	
BZ	"My name is David Hayes and I live in the Southcliff neighborhood. I am writing to express my opposition to the Draft EIS action alternatives 1 and 2. The very idea of destroying an historically vibrant neighborhood by demolishing homes to make apartment complexes, multiplexes and commercial enterprises is an anathema to the concept of community. Listening to planners at Height Development info meetings I understand there will be no parking provided for the potentially 4,000 new residents. That is unbelievable! While the idea of using bikes and public transportation is laudable, the vast majority of families and adults will own automobiles which end up plugging area streets, creating high traffic, noise, and pollution. Reality is that public transportation isn't efficient or convenient for many tasks, trips, jobs or vacations. A planner said a survey found people preferred housing over parking – ""would you prefer housing or a place to park your car"? That is not a legitimate survey question! A development of this size needs a parking garage either above or below ground. Southcliff is an attractive neighborhood because of its' quiet walkable tree lined streets. Commercial building as planned by the city would destroy trees and habitat and crowd the streets with parked cars. This additional traffic would add both ambient and runoff pollution. We have all made serious investments in our homes and neighborhood	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	upkeep. Invasion by commercial interests would quickly reduce property values resulting in personal financial loss. This plan is better named NEIGHBORHOOD DESTRUCTION. Our neighborhood has covenants from 1954 requiring single family homes not over 2 stories. Does the city have the right to destroy our legal C C and Rs? Sincerely' David Hayes [address] Vancouver,WA 98661 [phone number] "	
CA	"To Whom It May Concern - We are writing to formally request that the zoning designation of the two parcels located at [addresses] be treated the same as [address] and either be upzoned to Mixed Use or left as R-22 zoning. For context, we recently acquired the Pacific Pointe Apartments located on [address] as well as the two adjacent parcels at [addresses]. All three parcels are currently operated as one cohesive rental apartment community for middle income residents of Vancouver. Under current zoning, the possibility exists to add additional rental housing to the complex – under alternatives 1 & 2 of the proposed re-zoning, this much needed additional workforce housing would not be permitted. All three parcels are currently zoned R-22 Higher Density Residential. In the July 2025 Comprehensive Plan update, zoning proposals "Alternative #1" and "Alternative #2" seek to down zone [addresses] to Low Scale Residential while upzoning [address] to Mixed Use. It is our understanding that the City has a desire to increase the supply of middle-income housing – we strongly believe that the downzoning of [addresses] is not aligned with this policy objective. For clarity, we have attached snapshots of the parcels in questions below. Thank you for your attention to this request and we look forward to hearing back from the planning committee on how we can best help the City achieve its long-term goals. Best, Crown Point Real Estate Partners Jamie Robertson [phone number]"	Please refer to the response to Comment 262
CB	"> My name is Robert Nunn and I live at [address] in the Southcliff > neighborhood, where I have lived since 2006. I have reviewed the zoning change proposals being put forth in the City's Draft EIS . I am against the adoption of both alternates 1 and 2 as currently proposed. > My reasons for opposing these alternatives are because adding commercial and mixed use to our Neighborhood would mean losing qualities that makes Southcliff a desirable place to live. People of varied occupations reside here, city and utility employees, teachers, trades, real estate, airline maintenance and landscapers other professionals and retirees from all the above. >	Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	> The loss of mature trees that would result from redevelopment are 70 years old and some are over 100 feet high. Southcliff has one of the highest foliage tree canopy coverages in the city of Vancouver, (a vital contributor to the city's Tree City USA) I understood that the Heights District redevelopment would mean construction of commercial and multi-story buildings. If the City needs more density, please add it to the Heights plan and not Southcliff. In addition, the city/state could provide incentives to developers to improve and add to underused commercial properties with space to achieve 2045 goals for commercial development. A good example of this is the former Garrison Square. Also provide grants to developers, Apt owners, Vancouver Housing Authority to rebuild on existing properties to increase housing density to 2045 requirements. > The loss of trees and shrubs will mean the loss of wildlife habitat and shade, and an increase in noise from Mill Plain traffic. Increased housing and commercial use will decrease impervious surfaces as they will become covered by rooftops and driveways. This will stress our stormwater infrastructure, putting more stress on Blanford stormwater basin that due to climate change and more rain in winter is inadequate for future runoff and pollution mitigation. > In addition, adding mixed use commercial, with no parking means our streets will be jammed with parked cars and additional traffic from proposed businesses will increase the likelihood of accidents and remove the open and safe quality of our neighborhood. With no new access planned from Mill Plain Blvd, all new development will funnel onto our curvilinear residential streets, creating severe congestion and safety hazards for pedestrians and cyclists. > The proposed zoning changes directly violate Southcliff's long-standing restrictive > covenants (since 1954) and the 2001 Neighborhood Action Plan which mandates single family residential building height to two stories. This covenant has not been revoked by Southcliff property owners. > Southcliff is a historical mid-century modern neighborhood. The imposition of high density, mixed-use development will irrevocably alter its unique architectural and historical identity. > With the dynamic increase in density of housing combined with an anticipated overflow from the Heights District, this will overwhelm existing street parking and will not allow parking for other neighbors using Southcliff Park as they do today. As a mixed-use neighborhood, the proposed strategic pricing mechanism for on street parking in areas would also effectively charge residents for parking in our own neighborhood. > > Our property has a 100ft utility easement for the 115 KV transmission line that was installed prior to 1947. If this rezoning is to take place, the city or the developer would incur the cost of the relocation of the transmission lines, not the utility company. > > I enjoy the park with many people from other neighborhoods who visit for the quiet peaceful setting, and safe environment for families to grow and appreciate nature, and for younger families in our neighborhood. Groups of moms bring their toddlers for these very reasons because of the open space, safe environment and shade. The wide streets are perfect for walkers, bikers, and dog walkers who come from all over. > Southcliff is like a PBS Nature Program for all seasons. Winter, when the snow is on the ground you see the tracks of deer, coyotes, raccoons, possums , rabbits and various bird tracks. Hummingbirds will be close to the feeder, no more than 6 feet away when the snow is falling and it's 20° outside. In spring with trees budding, and birds singing, our flowering cherry is in bloom for all to enjoy. Migrating birds and bees use that tree for sustenance while it is flowering. Many bird varieties visit. > At night you can see the barn owl, the great horn owl and Screech Owl in our tall trees if you look hard enough. In our garden, first my mason bees, which are out before the honeybees, begin pollinating the fruit trees and flowers. Other bees, wasps and hummingbirds follow	

ID	Full comment	Response
	Our vegetable garden is shared with the community. We grow plenty for ourselves with surplus going to Fish food bank, St Lukes/San Lucas. > We should never take for granted all of the beauty here. If it goes away, it cannot be recreated. I appreciate the opportunity to provide my comments and suggestions. Robert Nunn"	
CC	"First ,it looks like the City is once again sitting in it's bubble deciding what's good for us. Negative comments will be ignored or poopooed. That said any zoning change to areas with established well maintained single family houses should not be changed to some multi use or other zoning. Also, before converting a zone to multi use or commercial you must consider parking for customers or employees.Everybody is not going to take one of those mostly empty busses."	Comment noted. Refer to Common Response #2 General Growth and Quality of Life Concerns and Common Response #6 Vehicle Parking for more information on these topics.
CD	"My name is Lee Donham and my wife's name is Sonjia. We live at [address] Vancouver, Washington in the Southcliff neighborhood. We moved here in 2006 because it is one of the most mature subdivisions in Vancouver, big lots, luscious trees, and foliage, wide streets a wonderful park. Families walk with their children and with their dogs, play in the park and have a secure, feeling of security. All this is being jeopardized by the cities draft EIS We do have CC&Rs that should be respected by the city planners. We are opposed to both alternative 1 and alternative 2 as proposed. Sincerely, Lee Donham Sonjia Donham"	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
CE	"Saturday, September 6, 2025 City of Vancouver RE: Draft EIS, Alternatives 1 and 2 My name is Shirley Hartman; I am privileged to make my home at [address], in the Southcliff neighborhood. I have lived in this lovely, quiet, safe and very private community for 40 years. The neighborhood's tree lined streets, well maintained homes and landscapes provide an oasis, a safe haven, and a sense of peace amidst the challenges and chaos of modern city life. I have reviewed the zoning change proposals being considered in the City's Draft EIS and I am without question against the adoption of Alternatives 1 and 2. Both alternatives cause the destruction of a very happy and established way of life including: Violation of Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954 and have served us well as evidenced by the dwellings in the neighborhood. Destruction of the peace, quiet and safety of the neighborhood would be the result of adding commercial and mixed-use to our streets. Mature trees and wildlife habitat would be destroyed in the process. Our majestic neighborhood trees are a part of the charm of Southcliiff. Influx of people to our neighborhood caused by commercial and mixed-use activity would add noise, and chaos and loss of our sense of safety. Traffic congestion on our neighborhood streets would be caused by allowing access to commercial and mixed-use high rises from the neighborhood rather than from Mill Plain. Since there are no accommodations for parking in the proposed alternatives our neighborhood streets would be jammed with parked cars on both sides. There would be	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	safety issues for our neighborhood walkers and cyclists. Today, there is no traffic congestion; vehicles are generally limited to our residents and their visitors. Increase in volume of pollutants and run-off would be the result of increased volume of vehicles in our neighborhood and added impervious surfaces to accommodate commercial and mixed-use development. Our neighborhood rain garden was intended to help remove pollutants in rainwater run-off based on the current volume of vehicles. Property values will be negatively impacted. The proximity of commercial and mixed-use buildings in our neighborhood will greatly decrease the value of our residential properties. It is my understanding that the Heights District redevelopment was intended to be the place where commercial and mixed-use high rises would be built. In my view, if the City needs more density it should be added to the Heights District, and not to Southcliff. Southcliff is a historic mid-century modern neighborhood that deserves to be preserved. It is appreciated by its residents for its quiet walkable streets and beautiful trees. A sense of peace, quiet and privacy prevails. It is a happy neighborhood; we feel safe here. Adoption of the zoning changes in the city's Draft EIS, Alternatives 1 and 2 would change all of that. Our way of life would be destroyed. Please don't do that. I implore you to reject Alternatives 1 and 2; please find another way to meet your density requirements. Sincerely, Shirley A. Hartman Email: [email address] Phone: [phone number] Residence and US Mail address: [address] Vancouver, WA 98661	
CF	"9/7/2025 Dear City of Vancouver, My Name is David Pelkey, and I live with my family in the Southcliff neighborhood at [address]. I have reviewed the zoning change proposals being put forth in the City's Draft EIS and discussed the impacts of the plan with many of my neighbors. Like all my neighbors, my family is against both Alternative 1 and Alternative 2 as proposed. We purchased our home in Southcliff six years ago so that we could enjoy the neighborhood for its many wonderful attributes. We enjoy the size of our lot, the trees and landscaping, wildlife, low level car traffic, our park, getting to know our neighbors, and the short walk to River Maiden for coffee. The proposed changes would dramatically change the personality and usability of the neighborhood we invested in and love. Southcliff would surely see constant construction activity, foot and vehicle traffic increase for residents and visitors, shrinking yards, and high turnover of residents. Accessing parking for retail would bring hundreds of additional cars into the neighborhood each week. The neighborhood would become busy, crowded, and noisy. Southcliff would no longer be Southcliff. It will turn into another busy, crowded, high density neighborhood. Many of those already exist in Vancouver. The new development going into The Heights will bring much greater density, multi-family options, and retail for those looking to live in that environment. This development is a great use for that open space and very welcome. Both alternatives violate Southcliff's regulations which allow for one single family dwelling per lot of no more than two stories high. These regulations have been in place since 1954. We moved to Southcliff for its quiet, walkable streets and beautiful trees.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Southcliff is a historic mid-century modern neighborhood that should be preserved as is and not destroyed by the City just to make room for people who might (or might not) move here by 2045. Thank You, David Pelkey and Family "	
CG	"Upon our retirements in 2015, after much consideration where we wanted to enjoy our retirement, we chose Vancouver, and specifically the Southcliff neighborhood, We were drawn here due to the beauty of the area, access to good services, and of course our HOME. During the home purchase process, we had to agree to a Longstanding Property Covenant. We agreed to the terms. We have truly turned our HOUSE into a HOME. We are against any changes to our neighborhood. Leave our beautiful neighborhood alone. Thank you. Karen and Mark Streeter [address] Vancouver, WA 98661 "	Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.
CH	"Hello, I have watched your presentations and read all maps and materials. I want to say that you have done a remarkable job at presenting the information and I am so impressed by the knowledge of it all. Thank you so much. I am 100% NOT in favor of any alternatives. Vancouver is already too crowded and community medical, safety and protective services and systems overloaded. Cost of living, crime and property taxes going up and quality of life declining rapidly year after year. Like Portland, Vancouver will be an undesirable place to live, work and fund a business. Thank you, Maureen Lee"	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to the Public Services and Utilities section of the Final EIS Chapter 3 for more information on the potential impacts to services and utilities, as well as proposed measures to address those impacts. Refer to Common Response #11 Property Value and Taxes for more information on this topic.
CI	"Dear City Planners and Officials, My name is Leslie Conboy, and I am writing to you today on behalf of my family – Auginne, our young children, and our aging parents – to express our profound concerns regarding the proposed zoning changes outlined in the City's Draft EIS. We reside at [address] in the Southcliff neighborhood, a community we chose specifically for its tranquil atmosphere, walkable streets, and the mature, picturesque trees that define its character. The proposed Alternative 1 and Alternative 2, in their current form, represent a significant threat to the very qualities that make Southcliff such a desirable place to live and raise a family. The addition of commercial and mixed-use developments, particularly multi-story buildings, would irrevocably alter the neighborhood's landscape. This would result not only in the loss of numerous mature trees – a vital component of our community's aesthetic appeal and ecological health – but also in the destruction of valuable wildlife habitats. This is simply unacceptable. We understand the city's need for increased density, but believe that the Heights District, already designated for high-rise development, presents a far more suitable location for such projects. Redirecting development to Southcliff would be a short-sighted decision with long-term, detrimental consequences. The current proposal would transform our quiet, child-friendly streets into congested thoroughfares, with vehicles parked on both sides, significantly impacting walkability and increasing noise pollution. Furthermore, directing access	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	to these new high-rises through our residential streets, instead of utilizing Mill Plain Boulevard, would create substantial safety hazards for pedestrians and cyclists, including our young children and our elderly parents. The environmental impact is also a serious concern. Southcliff's meticulously planned rain garden is designed to manage rainwater runoff based on existing traffic patterns. A significant increase in vehicle volume, as proposed, would overwhelm this system, leading to increased pollution and potentially harming the environment our children will inherit. Southcliff is a historic mid-century modern neighborhood, a unique asset to our city. It deserves preservation, not demolition for projects that cater to projected population growth well into the future. We urge you to carefully reconsider these proposals and prioritize the preservation of our community's character, safety, and environmental well-being. We believe a more thoughtful and integrated approach, focusing on the already designated Heights District, is crucial for sustainable development. We implore you to listen to the concerns of your residents and work towards solutions that protect the unique identity and quality of life in Southcliff. Sincerely, Leslie Conboy [address], Vancouver, WA 98661 [email address] [email address] "	
CJ	"Hello I live at [address]. This address is zoned light industrial, along with all the residences on my side of this street. Across the street from my house, all the homes are zoned residential. As I have just under 1 acre of property, most of which I don't use, I've contacted several agencies regarding building an ADU or allowing folks to live in tiny homes on my property. I have been told no to all of that and further that there is little chance of my ever being allowed to do this, because of the light industrial zoning. My house is down the street from Fruit Valley Elementary School and Fruit Valley Park, which has recently been upgraded and is now wildly popular with children and parents. There is also private and public housing, a mobile home park, multi-plex apartments and single family homes. About a mile down the street from me you can get to Shillapoo Wildlife Area where folks can fish, hunt, hike, bike and access Vancouver Lake. This is also one of the most people dense and low-income areas of Vancouver. I would like to ask that rezoning be considered for my address at [address]. so that I can help to make more housing options available for Vancouver residents. This would also allow me to create an income stream for me to be able to stay in the area through my retirement, and sustain my efforts to help with housing and maintain my local community connections. I would also be happy to consider working with any local organizations to make this happen or perhaps create a tiny house community. If the city is sincere in its efforts to create more housing opportunities for the people of Vancouver, and also sincere in its efforts to assist those with lesser resources, I would ask that the city of Vancouver look into options like these rather than continue to encourage rampant industrial and business growth in the Fruit Valley area. Current industry in the area already creates noise, pollution and traffic throughout the day and night. Allowing more industry would add more noise and more pollution. I can also tell you that as of this time I have no intention of using this property for a light industrial business of any kind. Further, whenever I am ready to sell the property, I will do my best to insure that it is sold to a family and not a business. Thank you for your time,	Please refer to the response to Comment 294.

ID	Full comment	Response
	Marilyn Abbink“	
CK	"Dear Ms. Major Attached are comments we have submitted regarding updates to the comprehensive plan. If you avoid opening attachments, I have pasted the body of the letter below. In short, we are in favor of ""No Action"" as both our quality of life and our property value would be severely affected by zoning changes. Thank you, William Craine [address] Vancouver WA 98661 1. Regarding the Our Vancouver comprehensive plan update, please record our comments and forward them to all appropriate decision makers. Our names are William and Debra Craine. We have lived at [address] in the Southcliff neighborhood since 2002. 2. We have reviewed the zoning change proposals being put forth in the City's Draft EIS. 3. We strongly support a "No Action" alternative with whatever zoning features would best preserve the historic character of our neighborhood. While we understand that some changes may be required by State mandates, we urge those changes be kept to a minimum. 4. Because our property backs Mill Plain Blvd, we are among those owners who would be most severely affected by zoning changes. Our reasoning against the "Action Alternatives" include: a. Both Alternate 1 and 2 are incompatible with established long term planning. When we returned to the area in 2002, following a military career, we paid particular attention to existing and proposed land use standards. The Southcliff restrictive covenants (dating to 1954) and the 2001 Neighborhood Action Plan both mandate single-family residential use with building heights restricted to two stories. All the properties have off street parking. Our purchase was based on an expectation the look and feel of the community we were joining would be preserved into the future. The action alternatives could replace our exiting adjacent neighbors with commercial and mixed use buildings up to 8 stories high. I don't see provisions for off street parking. Those changes would fundamentally alter the character and value of our property. b. The action alternatives either disregard or dramatically expand the impacts of the Tower Mall (Heights district) redevelopment. Southcliff is immediately adjacent to that property which is already being redeveloped with commercial and mixed use high rises. The lack of required parking is already expected to spill traffic congestion from there into our neighborhood. I believe Injecting higher density into both locations will make parking impossible. If higher density is required, it should be concentrated at Tower Mall while addressing adequate parking there. c. Southcliff is a historic mid-century neighborhood that should be preserved. The quiet streets and mature tree canopy provide a healthy and safe environment for both children and retirees to get exercise and connect with neighbors. With adjoining undevelopable land, Southcliff is a haven for wildlife. We have friends in Washington and other states where the real estate trends are toward gated communities designed to mimic the look and feel of what exists in Southcliff. We are not gated and welcome visitors to our streets and park. I don't believe allowing higher density zoning to destroy the character and historic identity of Southcliff will actually concentrate land use. It will simply remove green space in Vancouver while shifting low density development to less diverse and more affluent communities. d. In essence, the proposed rezoning is a taking of our assets. Our present quality of life is an asset that significant rezoning would devalue. Our privacy is an asset that the placement of an eight story building on a nearby or adjacent lot would destroy. Our home is a financial asset the changed character of the neighborhood would deflate. The personal costs of either action alternative are an unreasonable burden to place on people who are already accommodating high density redevelopment on bordering property.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	5. Thank you for the opportunity to comment. We again urge you to pursue plans that focus on renewal and development of existing commercial and mixed use zoned properties along Mill Plain Blvd. Southcliff is a small pocket of land with an established community. It is not in the interest of our neighbors or Vancouver at large to discard decades of community planning in favor of a drastically different vision. Respectfully William L. Craine Debra A. Craine"	
CL	"September 8th, 2025 Meredith Herbst City Hall PO Box 1995 Vancouver, WA 98668 Subject: City of Vancouver Comprehensive Plan Update Draft Environmental Impact Statement. Dear Meredith, The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Vancouver Comprehensive Plan Update as well as the earlier opportunity to comment on the scope of the EIS. We are pleased to see that many of our initial comments have been incorporated into this DEIS and commend the City for its efforts to integrate ecological considerations into its planning process. WDFW worked collaboratively with the City of Vancouver on the development of its Critical Areas Ordinance (CAO), and we are confident that the adopted ordinance provides a strong foundation to ensure no net loss of ecological functions. In reviewing the DEIS, we support whichever alternative offers the greatest protections for critical areas, recognizing that minimizing cumulative impacts near key habitats is essential to maintaining ecological resilience and preserving critical habitat functions over the long term. We also support options that allow for more flexibility for future development to avoid and minimize impacts to critical areas. Zoning Designations and Priority Habitats and Species (PHS) WDFW supports the City's use of the Natural Areas zoning designation, which include lands currently zoned for greenways and natural areas, where housing would not be allowed, as this aligns with the goals of WAC 365-196-815, which encourages innovative zoning techniques to protect critical areas. WDFW recognizes that the zoning adjacent to most areas of Burnt Bridge Creek is currently designated as Medium Scale Neighborhood (MSN). Given the current MSN zoning in place along the creek, WDFW recommends the City consider clustering development away from critical habitat and incorporating low-impact, green infrastructure to minimize ecological disruption and enhance habitat connectivity. We also note that some of the proposed rezones are located on parcels heavily encumbered by Oregon White Oaks (OWO). We sincerely appreciate that the City has incorporated WDFW's OWO management recommendations into its CAO. However, allowing an upzone on parcels dominated by OWO will likely lead to development pressures that trigger reasonable use provisions, resulting in unavoidable impacts to these ecologically significant habitats. We have included Attachment 1: "Oregon White Oaks in Zone Change Areas" for review and encourage the City to carefully consider zoning designations on such parcels to avoid scenarios where protection of these habitats becomes more difficult due to incompatible land use expectations. Prairie Ecosystems Historically, the Vancouver area hosted prairie ecosystems, which are now rare in southwest Washington. A Washington Department of Natural Resources Natural Heritage Program (DNR NHP) report documents the locations of historical prairie areas, contemporary grassland areas, and areas with soil types suitable for prairies in Clark County, including locations within the City of Vancouver (Caplow and Miller 2004). Westside prairie is a category of	The proposed Preferred Alternative maintains the Naturals Areas zoning designation citywide, which prohibits new development in these areas. With the Preferred Alternative, zoning adjacent to the Burnt Bridge Creek corridor would include a mixture of Natural Areas, Parks, Low Scale Neighborhood and Medium Scale Neighborhood. The Plants and Animals section of Chapter 4 of the Final EIS notes that regardless of alternative, all future development projects will be required to comply with city, state, and federal requirements for protecting plants, animals, and their resources and resulting in no net loss of functions and values in critical areas. Locally, these requirements include the City's updated Critical Areas Ordinance (CAO), which reflects best available science and complies with all state requirements for protection of critical lands and environmental resources. The CAO will apply to all development that occurs under the proposed Preferred Alternative, offering protections for critical areas including White Oak habitat. The Preferred Alternative aligns with proposed Comprehensive Plan Update goals and policies in the Climate and Environment, Parks, Recreation and Cultural Services, and Land Use and Development elements designed to facilitate planned growth while protecting critical areas, environmental resources, and open space and natural areas that contribute to community and environmental health and wellness. Relevant policy measures proposed in the Comprehensive Plan Update to avoid, minimize, and mitigate potential impacts on plants and animals of the Preferred Alternative are referenced in the Final EIS and include the following: • Meet tree canopy coverage goal of 28%, using the City's Equity Index to target investment in underserved neighborhoods lacking coverage. • Take inventory of and protect climate refugia and fish and wildlife habitat needs for species under stress from climate change. • Prioritize integrating green infrastructure into new development, redevelopment, replacement of existing infrastructure, and development of public spaces within the City to improve stormwater quality and reduce urban heat island effect. • Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide-free landscaping, enhancing biodiversity, and connecting natural spaces across the City through pollinator-friendly plantings. • Incorporate native plantings, food forests, and agroforestry into parks and public spaces to support food security, ecological health, and cultural knowledge sharing. • Create an expansive network of linear parks that encourage active transportation, improve community health and wellbeing, enhance tree canopy and stormwater management, and link parks and open space with housing. Updated landscape and tree standards in the proposed Vancouver Municipal Code Title 20 Development Code were developed in collaboration with the City's Urban Forester, include best management practices, and reflect increased requirements for retention of mature trees and the addition of new trees. The proposed code updates exclude critical areas from density calculations to ensure flexibility for new development to meet other standards while preserving environmental resources.

ID	Full comment	Response
	priority habitat per WDFW's Priority Habitat and Species (PHS) List, and they can host priority species such as the Taylor's checkerspot butterfly, valley silverspot butterfly, monarch butterfly, and Western bumblebee. WDFW recommends that critical areas surveys conducted prior to development include surveys for diagnostic prairie species, particularly in the areas identified in the DNR NHP report (Attachment 2). WDFW's PHS List provides lists of diagnostic vegetation species for both dry and wet westside prairies. We recommend that such vegetation surveys be conducted during the growing season; when possible, it is beneficial to conduct multiple surveys throughout the growing season to facilitate the identification of species that flower at different points in the season. Tree Canopy Lastly, a recent study of western Washington neighborhoods identified "brightspots", areas where housing density increased while maintaining or enhancing tree canopy cover. Notably, one such brightspot was located in the Orchards area of Clark County. This example demonstrates that thoughtful urban growth and ecological protection can coexist. Most brightspot neighborhoods were within existing urban areas, underscoring that housing densification can be compatible with tree preservation, biodiversity, and ecosystem function. We support the City exploring these "brightening" outcomes and building on local successes. Thank you for the opportunity to provide input. WDFW looks forward to continued collaboration with the City of Vancouver. Thank you for your consideration, Brittney Salter, WDFW Southwest Washington Land Use Planning Lead Reviewed and approved by: Dave Howe, WDFW Region 5 Habitat Program Manager Amaia Smith, WDFW Region 5 Assistant Habitat Program Manager Joy Peplinski, WDFW Region 5 Habitat Biologist "	Continued implementation of the City's Urban Forestry Management Plan will help to enhance the level of tree canopy cover citywide, which can help to reduce stormwater and flooding damage, improve air quality, provide habitat, and improve health outcomes. Continued updates to this plan will help to identify areas of the City that have fewer trees than others and develop strategies to help increase the tree canopy in these areas. The City appreciates the comments and collaboration with the Washington Department of Fish and Wildlife and looks forward to ongoing partnership to ensure responsible growth that maintains the quality and health of environmental resources and critical areas across the City.
CO	"Aug. 30th. 2025 Meredith Herbst City Hall P.O. Box 1995 Van. Wash. 98668 My name is Darlene Lehmann and I live at [address] in the Southcliff neighborhood. I am against the adoption of both Alternative I and Alternative II as currently proposed. Both of these Alternatives violate how this Southcliff neighborhood was zoned. The zoning was single family homes on each lot. Not over two stories. This zoning has been in force since 1954 and it should remain as single family homes. We bought our home in 1995 with the idea of living out our lives in a nice quiet neighborhood. We love this neighborhood. Everyone living in Southcliff does also. Now the streets are saf there are a lot of us who walk the streets. This will change with heavy traffic that goes along with rezoning. Kids ride there bikes to the park to play in the park on the slides, swings. Lots of us older neighbors walk their dogs on the streets with not much traffic, which would change with the proposed new rezoning. Please leave our neighborhood in Southcliff alone.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	People living here love their homes and love the way we can all be safe here. Rezoning would destroy that. Yours truly Darlene Lehmann + Richard Bjerke"	
CQ	"Southcliff I'm writing to express my objections to the zoning change proposals that the City's Draft EIS has set forth. Also I want to describe our neighborhood in hop[es that you will better understand how our lives will be impacted if Alternative 1 or Alternative 2 is adopted. I moved around a lot as a kid. I was 13 when my family moved here. My dad was in the Army and we were stationed at Vancouver Barracks. We had lived in at least eight cities. I learned things about neighborhoods living in all these cities. There was always one or more neighborhoods that stood out. Large or small, old or new, grand or modest, the neighborhoods had these things in common. The lawns were trimmed, the houses were in good repair, the streets were nice, there were green trees, and usually we'd see children playing. The neighborhoods had a certain aura to them. It was easy to see why; they were attractive and appealing. The owners cared about and took pride in them. Fast forward quite a few years. My husband and I had the wonderful opportunity to buy a home in Southcliff. We bought it from the original homeowners. We felt like we had won the lottery because Southcliff was one of THESE naeighborhoods. We were always proud to say we lived here. We raised our family and grandkids here. We have lived here for 39 years. We have many memories and history here. The following are memories I have which all took place in the street. I'm mentioning this because these streets are very important to us today. Just as they are; no sidewalks, very little traffic – just nice wide streets. Memories. In any given day we knew that our wide and not-very-busy streets were safe for the often wobbly bicycle riders. We were confident that our skateboarder would not be run over and that he had the necessary space to ""keey trying"". Both our kids and grandkids learned how to drive on these streets. In fact one daughter learned how to drive a ""stick shift"" hopping and jumping all around the neighborhood. We watched kids running back forth between houses for play dates. We saw hundreds of tricker treater at Halloween because parents knew that we were a dependable, welcoming neigborhood. And again, our wide streets were not busy. Our daughters practiced tennis for hours on Rhododendron. Occasionally they would have to move for an ongoing car. There has been square dancing street parties where the street was blocked off (permission granted by the city) and all ages were welcomed... the list goes on and on. I'm an older woman now. Every single day I look out my window and see people walking. Some are walking dogs. Kids are playing basketball. Young parents strolling by with babies. I see an elderly couple holding hands walking slowly and carefully. I see a woman and her aging mother go by. I see quite a few joggers and several cyclists. I see an old woman with her cane walk to the corner. I see Eagles circling and birds of many species. I see the Cooper Hawks that come back year after year to the nest in the trees next door. They are protected by federal law. And I wonder... where would this all go When my husband and I took out the mortgage on our home we acknowledged that the neighborhood had certain covenants. We considered it our priveledge and duty to abide by them. We took this very seriously. The covenants were established to protect us, the homeowner. It is a formal agreement of legal validity. Attached is a copy of the original copy of these covenants. Aren't covenants honored today? I'm opposed to Alternative 1 and Alternative 2. I don't want ANY buildings to be built that would alter what is already here. I don't want multiple parking problems and congestion that would be a natural offshoot from the proposed building.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Congestion would be so unsafe especially for our elderly population who walk in these streets daily. It would be unsafe for children. And for many of us. I'm opposed to these changes that would happen to our natural habitat. And mostly, I'm opposed to the demise of our neighborhoods as we know it today. Southcliff is an older, established neighborhood. It is a good place. It is a neighborhood the city can take pride in. It is a treasure well worth preserving. Toni Henderson [address] Vancouver, Washington 98661"	
CR	"The following comment concerns the Alternatives (Maps), Housing, Aesthetics, and Historic/Cultural Preservation. First and foremost neither Alternative 1 or 2 are acceptable ""as is"" due to the gross rezoning of the Hough and Arnada neighborhoods. The City should instead consider keeping a R9 like zoning posture (what is referenced as Low Scale Neighborhood) through the bulk of these neighborhoods augmented by more use of Mixed Use and/or Medium Scale along the perimeters i.e. along Fourth Plain, adjacent to I5 to H St., and along Kaufman from Fourth Plain to 33rd St. (encompassing the abandoned retail center, old Hidden foundry, etc..). This would be in addition to the Mixed Use corridor along Broadway/Main/Columbia. In support of this position please consider the following: Enough recognition is not given to the density that can be achieved with the existing State and City land use policies and zoning already existing in these areas. As a Tier A city under HB1110, Vancouver must already allow at least 4 homes per lot. Because these neighborhoods are served by mass transit, those within a quarter mile, which is over two thirds of the neighborhood, are required to support 6 homes per lot. (CTRAN #6 stops 6057, 6058, 6059, 3285, 6060, 6061, 6075, 6076; #2 stops 3285, 3294, 0524, 0525, 2003, 3492; Vine Green stops 6152, 6160). Furthermore, SB5559 and SB1096 have enabled administrative lot splitting to simplify the process of obtaining lots to which these houses can be built. Locally VMC 20.927 allows for narrow lots less than 40' including the provision of flag lots up to four. Under VMC 20.910.50 these can be zero lot line with appropriate covenants. This is important when taken in consideration of VMC 20.410/20.920 which allows specifically for R9 to have infill Tier 1 lots of 1500 sq.ft. (min 22.5ft wide/32.5ft deep). A good example of this is parcel 47284000 on 25th where a 5625 sq.ft. lot will be subdivided into 3 lots with a house and 2 ADU per lot using all of the above provisions thus achieving a density of 46 units per acre. If anything is needed, it would be streamlining processes and cost to achieve this density under R9, not entirely new zoning. Historically, Hough and Arnada are irreplaceable assets to this city. I live in Hough and presently restoring one of the 12 homes cited in the filing for the neighborhood's historic designation. I am distraught that the city would want these neighborhoods turned into rows or apartment complexes (Medium Density with 5 story structures). It is actually unusual (we did a search across the nation before selecting Vancouver) to find a vibrant neighborhood of 1900-WWII era housing that has a walkability score in the 90's. As this city, and country for that matter, tries to grapple with what community means, please consider that this housing type is porch oriented, meaning it encourages neighborly interactions, something that is palpable to anyone who spends time in it, and not readily found elsewhere in the city. These neighborhoods also represent an important cultural heritage that is being lost to the community as they were the housing stock for the Kaiser shipyards. There are dozens of fascinating stories we have uncovered in our own house and in talking to neighbors and it is not enough to just memorialize those in the CCHS museum and then tear them down. The report does call out ""medium-scale building allowed in this new zoning district [for both Alternatives] could have impacts on neighboring historic properties if they resulted in changes to their settings."" But the report then nonchalantly dismisses the risk by saying it has the ""lowest capacity for new housing units based on market forecasts and feasibility studies"". There are two issues with this. First it wrongly views the significance as a few historical objects when it is the neighborhood itself that is a majority of the significance. Saving a few structures as islands is	Since the Draft EIS, the City has developed a proposed Preferred Alternative land use map, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. The Preferred Alternative would zone Hough and Arnada as a mix of Medium-Scale Neighborhood and Mixed-Use Neighborhood, with Regional Activity Center along Main Street, as documented in the Final EIS. This approach aligns with Council direction to focus more housing and mixing of uses in and around key centers (e.g., downtown) and in areas such as Hough and Arnada that are already well served by infrastructure, businesses, transit, parks, schools, and other essential facilities and services. More information on streamlining the development process can be found in the draft Comprehensive Plan and draft Zoning Code, both of which are available on BeHeard Our Vancouver. Refer to the Historic and Cultural Preservation section in Chapter 3 of the Final EIS for more information on the potential impacts to the Hough and Arnada neighborhoods as well as proposed measures to address those impacts. Refer to the Aesthetics section of Final EIS Chapter 3 for more information on the potential impacts of taller buildings and proposed Comprehensive Plan policies to address these impacts. Refer also to the Common Response #11 Neighborhood Character for additional information.

ID	Full comment	Response
	not saving the characteristic of Hough/Arnada. And to what criteria do we hold what gets saved. My house was built by the neighborhood plats' namesake Elbert Biesecker, but he never lived in it as it was a rental property. It's big and Victorian so everyone loves it, but that was after decades of add-ons and renovations and ornamentation added post war, so is it really historical? As a neighborhood there are 512 contributing structure (whereas only 124 non-contributing), so again it is a neighborhood designation. Second, the feasibility study is based on vacant buildable land, which there is not a lot of, but does not account for economics and incentives which eliminate the need for vacancy in order for something to be built. These neighborhoods have already seen close to a dozen tear-downs for newer housing to be built, so the economics are already at our doorstep. Put in place the ability to build 5 story apartments without rezoning requirements, and you open the door to have complexes with single bedroom apartments charging rent equivalent to the mortgage of each the 3 or four homes torn down, not a hard business case to get investors for. This is not my first go around in an urban neighborhood with historic home undergoing gentrification and development pressures. I know from first hand experience that once the door is open it is extremely hard to close back. We had apartments tearing down houses on one end while on the other houses were being torn down to build McMansions. It took the neighborhoods 5 years to finally get designations and zoning changes to stop and only after some significant damage to the historical integrity of the neighborhood. I think it is worth mentioning that calling for historic preservation in the context of keeping the existing zoning, is not a call for a freeze on building or a NIMBY argument. A defining part of this historic neighborhood has been the organic nature of how it had developed and should be a part of it going forward. Thoughtfully adding structures and adapting structures has been an important and defining part of the neighborhood, whether that be an old structure from the prune farm that occupied John Ball Park becoming a house with an odd setback or the later construction of appropriately massed and scaled multifamily with street engagement like Manor Court Apartments In the report there is mention of only 49% ownership in Vancouver, much lower than the county and state. Although Hough and Arnada have had extreme price appreciation of late, these neighborhoods offer one of the few opportunities for new structures to be easily and cohesively built, with many potentially on subdivided lots, which would enable opportunity for ownership. Zoning for apartments will not increase ownership and will encourage this as the predominant development investment type. It is also unlikely that the wider ranch profiles found in the later developed neighborhoods in the east are candidates for this easy lot subdivision. Lastly, in considering the aesthetics, although mentioned, the report, and the city for that matter, needs to seriously address shadow and frankly air rights. One characteristic that stands out in the new development in downtown/riverfront is stark loss of daylight and lack of street activation (other than compulsory gestures on some facades). When looking at the Riva, Claro, Springs et. al there is no daylight in the street except at high noon. Furthermore there is a lack of street activation making walking something you just want expeditiously get through (in stark contrast to the many found strolling everyday in the Hough/Arnada neighborhood today). Taking this closer to Hough we have examples of what are my nightmare scenarios. In the first photo (House-wall) we have why this city needs to have stepped height restrictions and/or air rights (House-wall.jpg). Thankfully in R9 we have stepped setbacks which function to allow light (needed for day-lighting and optimal energy siting for passive heating, thus having impact on energy consumption). I have solar and can only think of how that investment would be thrown away if this happened next door. Of course stepped setbacks may not be plausible for all circumstances, thus why having air rights would enable the house in this situation to make an economic decision, potentially allowing this to be built, but being compensated for the devaluation and other losses. Next we have Navalia (Navalia.jpg) which could be a scene from the movie Up. One can see that this lone building is in the shadow (albeit not as bad as it could have been given that the parking adds a descent setback). Similar to the other examples its street presence is uncomfortable, with an attempt at activation on one side with retail, but yet seemingly unsuccessfully. Personally, our house is surrounded by small houses, some abandoned, and empty lots, so this could easily be our house instead of a small shop. Todd Spraggins Vancouver (Hough) resident; 98660	

ID	Full comment	Response
CS	"Dear Our Vancouver 2045 Team, My name is Darrell Fluit, and I live here in Vancouver. I work in design and construction, and I care deeply about how we build a sustainable, resilient future for our city. I want to share an idea that I believe should be part of our long-term planning: Roofs Before Fields™. Across Washington, solar developers are clearing hundreds of acres of farmland and open space to install solar fields. While renewable energy is vital, this approach is backwards. Every acre of farmland we lose is an acre of food security and rural heritage gone forever. Meanwhile, Vancouver has thousands of rooftops — schools, warehouses, commercial buildings, homes, and parking lots — that sit empty in the sun. These are surfaces we've already built, and using them first for solar power protects farmland, keeps energy local, and saves taxpayers money by avoiding expensive land acquisition and transmission upgrades. Roofs Before Fields™ is common sense. It: • Protects farmland and food security. • Strengthens the local grid and energy resilience. • Creates good-paying jobs for roofers and electricians here in Vancouver. • Demonstrates leadership in sustainability and innovation. I am asking that the City of Vancouver lead by example and make rooftop-first solar development a guiding principle in the Vancouver 2045 plan. This could begin with a pilot requirement: solar on all new schools, public buildings, and large commercial projects. Over time, we can move toward making solar rooftops a standard part of new construction in our city. This vision ties directly to Vancouver's motto: "A colorful past, a bright future." By protecting farmland, we honor our past. By investing in rooftop solar, we secure our bright future. Thank you for considering this idea as you shape the long-term vision for Vancouver. Sincerely, Darrell Fluit [phone number]"	Comment noted. Your comment was reviewed and is outside the scope of the SEPA analysis for the Our Vancouver Comprehensive Plan Update. The Air Quality, Greenhouse Gases and Climate section of Chapter 4 of the Final EIS proposes implementation of several policy measures in the Comprehensive Plan to avoid, minimize and mitigate potential impacts to these environmental resources, including expanding community solar access for low-income homeowners and renters. Refer to the draft Comprehensive Plan Climate and Environment chapter, available on BeHeard Our Vancouver, for goals and policies related to energy resources.
CT	"Hello , my name is Merrilee McGough, at [address] in the Southcliff neighborhood. I have reviewed the zoning change proposals being put forth in the City's Draft EIS, and I am against the adoption of both Alternative 1 and Alternative 2 as currently proposed. I came to Southcliff from Bellevue 23 years ago; it is hard to believe that it has been that long. I did not know at the time how wonderful my neighborhood would turn out to be. Our neighborhood was built in a snapshot of history; it cannot be replicated or replaced. Owners bought the lots, created the CC&R's and built their dream homes. It is a piece of an original Master Plan Community that was initiated by them, the then movers and shakers of Vancouver, incorporating the Tower Mall area, which now is planned to become designated as The Heights District. Some of those original owners still live here in the same homes, some have moved on in one way or another. A few did leave, but have now returned for a second time, and some are second generation. It is the people that make a neighborhood great. Turns out, it's just too good for people to leave. Today, from my home office I look up to see a lovely doe in the front yard, nibbling away on shrubs as she crosses the street back on the way down into Blandford canyon. Another day she came with her fawn. One day, there is a great blue heron that has landed on the neighbor's roof, then swooping down in to visit my pond. The Mallards have permanent reservations here. At dusk there is a big hoot owl in the old birch tree. When I walk to our park I come across deer playing in the grass. We are part of the greenbelt that includes Blandford Canyon, Southcliff Park &	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	Dubois Park, connecting to other greenspaces. Turns out, it is just too good for the wildlife to leave as well. We hope it can stay that way. I fail to see how any redevelopment process that calls for paving over Southcliff is the answer to anyone's current problems. It is just not logical, not for this neighborhood, nor does it serve any other citizens of our city. The illogical loss of something wonderful, something that is as green and irreplaceable as this, would not IMHO be progress. Sincerely, Merrilee McGough	
CU	"Honorable Commissioners and City Councilmembers, On behalf of the Village at Fisher's Landing Neighborhood Association (VFLNA), please find attached our board's public comment on the Draft Environmental Impact Statement (DEIS) for the Vancouver 2045 Comprehensive Plan, along with supporting materials. Our neighborhood strongly favors the No Action Alternative as the best way to preserve livability, protect residential character, and honor long-standing land-use agreements. We appreciate the opportunity to participate in this important process. Attachments: 1. VFLNA Board Public Comment Letter – September 2025 (VFLNA Board public comment – DEIS-Vancouver2045- September 2025.pdf) 2. Appendix A – Summary of Community Survey Results (VFLNA_Public_Testimony_Survey_Summary_May27.pdf) Attachments sent separately (due to file size): Appendix B – Resident Petitions (Individual Letters) Please let us know if any additional information is needed. Sincerely, Atul Mathur President, Village at Fisher's Landing Neighborhood Association www.vflna.com September 8th, 2025 City of Vancouver Planning Commission and City Council City Hall, PO Box 1995 Vancouver, WA 98668 Re: Comments on the Our Vancouver 2045 Draft Environmental Impact Statement (DEIS) and Alternatives (maps) Honorable Commissioners and Councilmembers, On behalf of the Village at Fisher's Landing Neighborhood Association (VFLNA), we appreciate the opportunity to comment on the Our Vancouver 2045 process, including the Draft Environmental Impact Statement (DEIS) released July 8, 2025. We value the City's extensive outreach and the State Environmental Policy Act (SEPA) review framing this decision. We also appreciate the clear invitation for public comment now underway. VFLNA represents a well-established single-family neighborhood in East Vancouver adjacent to SE 164th Avenue and the SE 34th Street, including Hamlet at Fisher's Landing. VFLNA is a long-standing neighborhood association actively engaged in citywide initiatives, including the neighborhood sustainability efforts. Our members consistently volunteer their time and contribute feedback to enhance livability, equity, and environmental responsibility. Our members carefully reviewed the Action Alternatives 1 and 2 mapping and the No Action Alternative. We understand these alternatives will inform a "preferred alternative" for final environmental review later this year. After surveying our residents (100+ verified responses), over 90% support preserving our current zoning and neighborhood form. While we recognize that even the No Action Alternative must incorporate Washington's Middle Housing mandates, our community strongly favors No Action Alternative as the least disruptive and most aligned with neighborhood character and long-standing private deed restrictions.	Comment noted. Refer to Common Response #13 for the City's response to comments about the Village at Fisher's Landing neighborhood.

ID	Full comment	Response
	Primary Issues 164th Avenue and 34th Street sound walls and noise impacts The wall buffering traffic along SE 164th Avenue and the transit center is integral to livability—limiting traffic noise, preserving quiet streets, and maintaining safety and walkability. Residents are concerned that rezoning and associated redevelopment under Action Alternatives 1 and 2 could lead, directly or indirectly, to removal, lowering, or perforation (e.g., new access points) of the wall, or otherwise reduce its effectiveness. We request that the Final EIS provide site-specific noise analysis and mitigation commitments for the 164th Avenue edge, including explicit confirmation that any future street or site reconfiguration will preserve or enhance the wall's noise-attenuation function. Vancouver's development standards already contemplate sound walls as mitigation—please apply those standards here and commit to no net increase in noise at the residential property line. Requested clarifications in the Final EIS: • Whether any Action Alternative contemplates removal/modification of the 164th Avenue or 34th Street sound wall (or addition of openings) affecting noise performance. • Project-level triggers that would require wall replacement, height, or design changes to maintain current attenuation levels. • How construction-phase noise at the site of Fisher's Landing transit center during its development will be managed for edge properties. 2) Strong preference for No Action Alternative Our position: The No Action Alternative —with only the state-required housing changes— best preserves neighborhood character, avoids glaring incompatibility with CC&Rs, and minimizes displacement pressures while still meeting state law. VFLNA's CC&Rs limit lots to single-family residential use, prohibit commercial activity, and preclude lot-splitting. Applying higher-intensity overlays under Action Alternatives 1 and 2 invites confusion or misalignment: City permits could allow uses and intensities that owners are privately prohibited from pursuing, creating confusion, friction, speculative pressure, and uneven outcomes within the same block. We recognize the City must implement state Middle Housing requirements (HB 1110) even under the No Action Alternative, but we believe it represents the least disruptive path for VFLNA. Further, as municipal advisors have noted in related contexts (e.g., ADU law), existing private covenants remain enforceable and are not displaced by state housing mandates. Clear public guidance is needed so residents, builders, and staff understand that zoning allowances do not nullify recorded CC&Rs and how the City will message and administer this interplay. While we recognize that CC&Rs are private instruments not enforced by the City, avoiding zoning overlays that would create potential conflicts between private restrictions and public entitlements would help reduce confusion, speculation, and neighbor dispute. Community Evidence VFLNA conducted a neighborhood survey (100+ verified households). Over 90% favored preserving the current zoning/character and opposed upzoning overlays that conflict with CC&Rs. Respondents cited quiet streets, mature trees, and intergenerational stability as core values. (Survey summary attached.). Since then, around 20 residents of houses facing the 165th Avenue have also requested VFLNA to submit their individual petitions (See attached PDF with scanned petitions) that also request preserving the current zoning/character Policy Recommendations & Specific Requests 1. Preserve and enhance the 164th Avenue and 34th Street sound wall o Commit in the Final EIS and implement policies to retain or strengthen the sound wall's attenuation (no net noise increases at the residential edge). O Require project-level noise studies and mitigation for any redevelopment along 164th Avenue or near the transit center. O Treat any new pedestrian or vehicular openings as Type I noise-sensitive design with equivalent or better acoustic performance.	

ID	Full comment	Response
	2. Affirm No Action Alternative as the basis for our area o Use No Action Alternative for VFLNA's residential blocks, implementing only those middle-housing allowances mandated by state law (HB 1110), and defer any additional intensity to appropriate corridors with infrastructure capacity. 3. Respect private CC&Rs when mapping overlays o Avoid applying higher-intensity overlays within platted areas where recorded CC&Rs prohibit multi-unit or commercial uses; direct growth to corridors and centers without these conflicts. It also provides a clearer picture of realistic housing capacity citywide. O Publish a plain-language guidance bulletin explaining that while zoning determines what the City may permit, existing CC&Rs remain private, enforceable restrictions between property owners. 4. Transparency in the Final EIS o In the Response to Comments, directly answer: a) Whether any action alternative affects the 164th Avenue or 34th Street wall; b) How the City will communicate the zoning–CC&R relationship to applicants and homeowners; c) Where No Action applies in Village at Fisher's Landing, including Hamlet, with maps in the Final EIS. Closing We support thoughtful planning for growth and housing choice. For the VFLNA area, we respectfully ask the City to select No Action Alternative, preserve the 164th Avenue and 34th Street sound walls'function, and avoid overlays that directly conflict with recorded CC&Rs. These steps will protect neighborhood stability while the City fulfills state housing obligations. Thank you for your consideration and for the City's continued engagement. VFLNA stands ready to collaborate and provide additional data, including details of our survey results and on-the-ground observations. Sincerely, Village at Fisher's Landing Neighborhood Association Board of Directors www.vflna.com References (for staff) • Vancouver Municipal Code 20.912.080, Sound Walls (height and noise-study standards). (Vancouver Municipal Code)"	
CV	"Ms. Herbst, Please see attached letter of opposition to the proposed DEIS, Options 1 & 2 relating to proposed rezoning in the South Cliff Neighborhood. Best Regards, John Rudi South Cliff Resident 8 September 2025 To: Rebecca Kennedy, Deputy Director Meredith Herbst, Associate Long Range Planner From: John Rudi, Resident, South Cliff Neighborhood. RE: Opposition to South Cliff Neighborhood DEIS Vancouver 2045 Comprehensive Plan Update , Options 1 and 2. I wish to express strong opposition to the proposed rezoning of the South Cliff Neighborhood in the DEIS Vancouver 2045 Comprehensive Plan Update, Options 1 and 2; Specifically the rezoning of properties bordering Mill Plain Blvd to Mixed Use and Medium Density housing. South Cliff is a 75-year-old legacy community with a unique identity worth preserving. Its wide streets, established landscaping, walkability, and safe spaces for families and seniors create a destination for surrounding communities who enjoy walking, biking, and spending time here.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.

ID	Full comment	Response
	There are very few communities in Vancouver that can be compared to South Cliff and allowing Mixed Use and Medium Density housing on any portion would destroy the character and livability of our neighborhood. Mixed Use and Medium Density housing development is incompatible with the neighborhood's character. The increased traffic, noise, and parking congestion will dramatically change our neighborhood's quality of life. Mixed Use will impact the safety of children, elderly, and families who use the streets daily for walking and biking. The layout and traffic flow of the neighborhood is not suitable for increased density or commercial development. It was our understanding the development of Tower Mall was the ""solution"" to address the increased housing and commercial needs for Mill Plain communities and the city. Now apparently that's not enough. Rezoning portions of South Cliff would not only harm South Cliff but also surrounding neighborhoods who rely on our shared community streets and park. Acknowledge and understand the city's need for growth, but growth must be directed to appropriate areas-not historic, low-density legacy neighborhoods. I want to reiterate my strong opposition to both proposed options to the DEIS and ask that the City of Vancouver planning team look for alternate solutions to putting both Mixed Use and Medium Density housing in South Cliff or any other Legacy Neighborhood. Best Regards, John B Rudi [address] Vancouver, WA 98661"	
CW	"Hello, Please accept the attached petition titled 'Keep Housing in Vancouver's Future' as formal public input for the City of Vancouver's Comprehensive Plan update. This petition has been signed by 97 community members and reflects broad support for prioritizing housing in Vancouver's long term planning. We respectfully request that it be entered into the public record and shared with the City Council for consideration. Attached are both the petition text and the signature data for your review. Thank you for your time and for ensuring that community feedback is included in this important process. Best, Kayla Slater Keep Housing in Vancouver's Future – Support Housing in the Comprehensive Plan The City of Vancouver is finalizing its Comprehensive Plan – the blueprint for how and where we grow over the next 20 years. This is our opportunity to ensure enough multi-family housing is built to meet our community's needs and keep homes affordable for the people who live and work here. Why This Petition Matters: • Vancouver's population is growing faster than our housing supply. When there aren't enough homes costs rise, families are displaced, and our community's stability erodes. • Without enough multi-family homes in all neighborhood's prices will rise faster, more families will be pushed out, and stability will slip further out of our reach. • Vancouver's population is projected to grow from 200,400 in 2025 to 267,000 by 2045. An increase of more than 66,000 people in just 20 years.	Comment noted. Since the Draft EIS, the City has developed a Preferred Alternative, which combines elements of Alternatives 1 and 2, for further analysis in the Final EIS and consideration for the Comprehensive Plan Update. Refer to Common Response #1, Selection of Preferred Alternative, for more information about how this alternative is similar to and different from the alternatives reviewed in the Draft EIS. Refer to Common Response #8 Housing Affordability/Options, #9: Homeownership Opportunities, and #10 Businesses in Residential Areas, which addresses comments related to mixing residential uses with services and commercial uses.

ID	Full comment	Response
	• Roughly 34,000 additional housing units are needed by 2045 to meet the housing demand of our community. From the published Draft EIS: "Alternative 2 would have the highest capacity for new housing units and 49,300 new jobs citywide." • Vacancy rates for affordable units are at historic lows. Without action affordability will worsen, and more families will face the risk of displacement of homelessness. I hear from families in our community who are terrified they'll lose their housing. Parents here are worried that their children will have to sleep in a car if they can't figure out how to prevent an eviction. Seniors on fixed incomes who can't keep up with rent fear losing the community they've spent a lifetime building. Workers that keep our city running can't afford commutes that drain both time and income. Survivors of domestic violence who can't afford an apartment on their own are forced to prioritize housing over safety. Many of our neighbors are in survival more, they don't have time or energy to attend hearings, write policy letters, or organize petitions. This petition is meant to uplift their voices and ensure our leaders have proper community perspective, the ones necessary to plan successfully for Vancouvers future. By signing you're urging Vancouver's City Council to: 1. Keep and expand plans for medium scale and mixed-use areas in the Comprehensive Plan. 2. Ensure new housing includes a range of price points so people at all stages of life can find a home here. 3. Build housing close to jobs, schools, and transit to reduce cost burdens and keep families connected to their communities. Restricting multi-family housing in our neighborhoods will only deepen the shortage, increase displacement, and push more families into crisis. Vancouver can't afford to turn away solutions when our community need is so great."	
CX	City Council & Planning Commission, Let me start by saying (honestly) how very disappointed I am with you all. Southcliff is one of the best neighborhoods in Vancouver, Why would you try to ruin it? We had to move from Vancouver to Renton for my husbands job. A few years later we headed back. We knew exactly what neighborhood we wanted to live in! I've been here for 48 years and raised by children here. Generally, when someone moves here, they stay. We have nice people, a good park and wide roads with no sidewalks. People come here to play in the park, walk their dog and enjoy the peace. SouthCliff is a treasure. It would be a shame to ruin it. Vancouver is now full of appartments. We don't need more & we don't need more people! Please listen to our concerns. Sincerely, J.A.	Comment noted. Refer to Common Response #14 for the City's response to comments about the Southcliff neighborhood.


OUR VANCOUVER
OUR FUTURE.
CITY OF
Vancouver
WASHINGTON

CITY OF
Vancouver
WASHINGTON

OUR VANCOUVER
2026-2045 Comprehensive Plan

Adopted June 1, 2026
Effective July 31, 2026

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Parks & Recreation Advisory Commission
Transportation & Mobility Commission
Urban Forestry Commission

Partner Organizations

Alchemy Partners
Alliance for Community Engagement (ACE)
Building Industry Association of Clark County (BIA)
Capacity Commercial Group
Cascadia Development
Clark College
Clark County Community Development
Clark County Council
Clark County Food Bank

Clark County Public Health
Community Roots
Columbia River Economic Development Council (CREDC)
Council for the Homeless
C-TRAN
Cycle Vancouver
Edlen & Co
Evergreen Habitat for Humanity
Evergreen School District (ESD)
Fort Vancouver Library District
Fort Vancouver National Historic Site
Fourth Plain Forward
Ginn Group
Greater Vancouver Chamber (GVC)
Holland Partner Group
HSP Properties
Hurley Development
Identity Clark County
Inland Construction and Development
Killian Pacific
National Association for the Advancement of Colored People (NAACP) of Vancouver
Odyssey World International Education Services
Latino Leadership Northwest (LLNW)
LSW Architects
Mackay Sposito
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Pacific Islander Community Association (PICA) of WA
Palindrome
Pasitos Gigantes
PeaceHealth
PFLAG
Port of Vancouver
Proud Ground
Provision Group LLC
Queer Community Network (QCN)
Regional Transportation Council (RTC)
Romano Capital
Sakura 39ers
Southwest Washington Accountable Community of Health (SWACH)
Southwest Washington Equity Coalition (SWEC)
SWWA League of United Latin American Citizens (LULAC) Council #47013
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Thompson Metal Fab
Vancouver Bee Project
Vancouver Downtown Association (VDA)
Vancouver Farmers Market
Vancouver Neighborhood Alliance
Vancouver Neighborhood Associations
Vancouver Housing Authority (VHA)
Vancouver Public Schools (VPS)
Watershed Alliance of Southwest Washington
Washington Conservation Action
Washington Low Income Housing Alliance
Washington State Department of Commerce
Washington State Department of Ecology
Washington State University Vancouver
Wolf Industries
YWCA of Vancouver

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List of Acronyms

ADA	Americans with Disabilities Act
ADU	accessary dwelling unit
AMI	area median income
AMR	American Medical Response
BIPOC	Black, Indigenous, and People of Color
BMP	best management practice
BSM	Bicycle and Small Mobility
CFP	Capital Facilities Plan
CIP	Capital Improvement Program
Ecology	Washington State Department of Ecology

EIS	environmental impact statement
EPS	Evergreen Public Schools
FAR	floor area ratio
FVRLibraries	Fort Vancouver Regional Library District
GHG	greenhouse gas
GMA	Growth Management Act
I-5	Interstate 5
I-205	Interstate 205
K-to-birth	kindergarten-to-birth
LEP	limited English proficiency
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer/Questioning (+ includes additional identities, such as Intersex and Asexual)
LID	low impact development
LOS	level of service
LTS	level of traffic stress
MGD	million gallons per day
MMLOS	Multimodal Level of Service
NRPA	National Recreation and Park Association
PIF	park impact fee
PM2.5	fine particulate matter
RCW	Revised Code of Washington
RTC	Regional Transportation Council
SEPA	State Environmental Policy Act
SFS	Street Funding Strategy
SNAP	Supplemental Nutrition Assistance Program
TBD	to be determined // Transportation Benefit District
TIF	traffic impact fee
TIP	Transportation Improvement Program
Transition Plan	ADA Self-Evaluation and Transition Plan
TSP	Transportation System Plan
UFMP	Urban Forestry Management Plan
UGA	urban growth area

VA	U.S. Department of Veterans Affairs
VFD	Vancouver Fire Department
VMC	Vancouver Municipal Code
VMT	vehicle miles traveled
VPD	Vancouver Police Department
VPRCS	Vancouver Parks, Recreation & Cultural Services
VPS	Vancouver Public Schools
VUGA	Vancouver Urban Growth Area
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

Introduction

Vancouver is a city defined by change. Once a modest trading outpost, it has grown into Washington's fourth largest city and the primary urban center of Clark County, with more than 200,000 residents today. By 2045, that number is projected to exceed 281,000, a scale that underscores the importance of intentional planning to accommodate new growth and ensure livability and opportunity for all community members.

Throughout its history, Vancouver's identity has been shaped by rapid, transformational shifts. The city is currently in the middle of a major transformation, shifting from a traditionally suburban development pattern to a more urban character as land resources decrease, and where access to amenities and services, a range of transportation options, and a variety of housing types and price ranges are increasingly important. Economic and cultural changes are also reshaping how people live and work. Remote and hybrid employment is more common, housing is increasingly unattainable for many low- and middle-income residents, smaller household sizes are driving different housing needs, and younger generations place a premium on inclusive public spaces and vibrant cultural life. These shifts frame a central opportunity of the Comprehensive Plan: leveraging growth to enhance our daily experience in the community, strengthen the social fabric, delivering increased amenities and benefits, and creating neighborhoods where all residents can thrive.

OUR Evolution as a Community



Fort Vancouver, 1845 Sketch by Lt. Henry Warre (UW Special Collections, WAS0374)

Vancouver's history begins with the Indigenous peoples who historically have inhabited and stewarded this land for more than 10,000 years, and whose descendants continue to be a part of the Vancouver community today. The Chinook people lived in large rectangular houses made of cedar planks, located in towns along the north bank of the "Wimahl" River, or "Big River," near its confluence with Oregon's Willamette River. Rich in salmon, plants, and berries, the Chinook people lived in relative abundance and became prolific traders. Included in this extensive trade network were the nearby Cowlitz and Klickitat tribes. The Columbia served as a vital transportation corridor and the foundation of an extensive trade network that sustained these communities and connected them to neighboring regions. The Cowlitz tribe likely lived along the Cowlitz River a short distance upstream from its confluence with the Columbia River. They traveled by canoe on the Columbia River near present day Vancouver and passed through the area by land regularly as well. The arrival of Europeans to this area beginning in the mid-1700s brought waves of smallpox and other diseases that devastated Native communities. By the early 1800s, when Lewis

and Clark passed through the area, the Native population had suffered significant losses. Today, the Chinook Indian Nation—comprising five constituent tribes—continues to advocate for federal recognition, which was briefly granted in 2001 and rescinded in 2002.



The Hudson's Bay Company established Fort Vancouver in 1825 as a fur trading post and administrative center. Chinookan and Cowlitz peoples were hired by the Company in their traditional roles as middlemen, which facilitated the Company's access to the established trade network in the area[1]. Within two decades, the Fort became the hub of commerce for the region, housing the first school, library, and theater on land that is now known as the state of Washington. By the 1840s, it was the largest concentration of people on the West Coast. While company officers lived within the stockade, the broader workforce and their families lived in Kanaka Village, a multicultural settlement, including Hawaiian Islanders, French Métis, Iroquois, and local Native people.

American settlers began arriving in the 1840s, and after the U.S.–Canada border was fixed at the 49th parallel in 1846, Fort Vancouver's role declined. The U.S. Army established barracks nearby in 1849, drawing additional settlers and cementing Vancouver's military importance. The city was incorporated in 1857 with roughly 1,700 residents, becoming one of the first incorporated cities in the Washington Territory. By 1880, Vancouver had become the third largest town in the territory. Records from the late nineteenth century show the presence of Chinese laborers and Buffalo Soldiers—segregated army regiments of Black American men—stationed at Vancouver Barracks, though the broader White community discriminated against these groups.

The early twentieth century saw Vancouver expand through annexation (1909) and infrastructure investment. The opening of the Vancouver–Hayden Island Railroad Bridge in 1906 and the Interstate Bridge in 1917 connected the city more directly to the region and fueled industrial growth. Immigrant families, including Japanese farmers, shaped the agricultural economy but faced discriminatory laws. In 1940, Alcoa opened a major aluminum plant, followed by the Kaiser Shipyards in 1942, which tripled the city's population almost overnight. To meet the need for housing, the Vancouver Housing Authority constructed more than 12,000 family units and 10,000 dormitories, reshaping neighborhoods across the city. After the war, most temporary wartime housing was demolished or converted into subdivisions.

[1] An Ethnohistorical Overview of Groups with Ties to Fort Vancouver National Historic Site

Postwar decades also brought new infrastructure and urban renewal. Construction of Interstate 5 (I-5) in the 1950s cut through neighborhoods and severed connections to downtown, accelerating suburban development and retail flight. The City adopted its first Comprehensive Plan in 1957, establishing segregated land uses and suburban street patterns. Urban renewal programs in the 1960s and 1970s demolished portions of downtown housing stock, displacing lower-income residents and impacting historic buildings. In 1973, Oregon passed Senate Bill 100, which established an urban growth boundary and limited outward expansion into farmland surrounding Portland. New restrictions on growth south of the river, along with construction of the Interstate 205 (I-205) bridge to Vancouver, catalyzed a significant amount of growth that occurred in Clark County, particularly in what is now East Vancouver.

The late twentieth century and early twenty-first century marked another transformation. Annexations in the late 1990s and mid-2000s dramatically expanded city boundaries, nearly doubling the city's overall population, while the growth of high-tech industries and large-scale redevelopment efforts reshaped the urban core. Long-term investments and strategic planning, such as the Esther Short Park Redevelopment Plan, the 2007 Vancouver City Center Vision (VCCV), and the development of the Waterfront reconnected Vancouver to its riverfront and created a renewed sense of civic identity.



Hudson House on the Kaiser Shipyard Site (Vancouver Housing Authority)

Today, Vancouver is home to just over 200,000 residents and is one of the most diverse communities in the region. Since 2010, communities of color have grown by over 60 percent, and Black, Indigenous, and People of Color (BIPOC) populations countywide have nearly doubled. The City continues to confront challenges of housing affordability, displacement, climate change, and infrastructure needs while building on a long legacy of resilience. With the 2022 Climate Action Framework, 2023 Strategic Plan, 2024 Transportation System Plan and the 2025 Comprehensive Plan update, Vancouver is setting the stage for its next chapter: a future that honors its Indigenous roots, addresses past inequities, and creates a more equitable, sustainable, and prosperous community for generations to come.



Vancouver Waterfront and the Grant Street Pier in 2025.

Vancouver's identity is inseparable from the Columbia River, a defining natural feature that has shaped the city's history, economy, and community life for thousands of years. Today, the Columbia River remains central to Vancouver's identity—supporting industry and recreation, and reinforcing the city's role as a connected regional hub. This longstanding relationship carries a responsibility to steward and protect the river for future generations. As Vancouver grows, the Columbia River will play a critical role in shaping a more resilient and sustainable future—supporting habitat restoration, climate adaptation, and equitable access to open space and recreation. Our future depends on our ability to protect this natural resource, and responsibly and equitably increase access to it as a civic gathering space and public amenity.

What Issues Face the Community in 2026?

Housing Affordability and Displacement. Housing costs have risen dramatically in the past decade, with median rents increasing by more than 60 percent since 2011 and home prices nearly tripling. Nearly half of all renters are cost-burdened, with more than a quarter paying over half their income on housing. Displacement risk is highest for Black, Hispanic/Latine, and lower-income households, many of whom are concentrated in neighborhoods along the Fourth Plain Corridor, Fruit Valley, and Walnut Grove, and in the northeast corner of the city. Meeting the state-mandated target of more than 38,000 new housing units by 2045 will require increasing production, streamlining regulations, reducing review timelines, and finding new sources of funding to both preserve and build new rent-restricted affordable housing.

Climate Change and Environmental Stress. Vancouver is already experiencing the effects of climate change, from extreme heat and wildfire smoke to flooding and degraded air quality, with these impacts expected to increase over the next 20 years. Vulnerable populations—including older adults, children, and households with low incomes or limited English proficiency (LEP)—face disproportionate exposure to these hazards. Neighborhoods with less tree canopy and higher concentrations of pavement, such as parts of the Fourth Plain Corridor and East Vancouver, are more susceptible to urban heat. Addressing climate resilience is critical not only for physical infrastructure but also for the daily comfort, health, and safety of residents.

Evolving Demographics and Community Needs. The city is transitioning from a suburban to a more urban environment, with demand growing for smaller, more affordable homes near transit, parks, and neighborhood services. The share of residents over 65 is increasing, households are getting smaller,

Community Overview

- Population: **202,600**
- Median Age: **36.8 years**
- Youth: **21% under 18 years**
- Seniors: **21% are 65 years +**
- Size: **51.84 square miles**
- Housing Units: **71,649**
- Tenure: **49% rent, 51% own**
- Median Home Sales Price: **$477,000**
- Median Household Income: **$76,799**
- Disability Status: **14.7%**
- Has a Bachelor's Degree or Higher: **31.2%**
- Speaks a language other than English: **14.7%**
- Veteran Status: **7.7 %**

and more residents live alone. This creates new needs for accessible housing, social infrastructure, and community spaces that foster connection and reduce isolation.

Economic Shifts and Disparities. Vancouver has attracted new employers in healthcare, technology, and education, strengthening its job base. Yet median household income remains below the county average, and many jobs in retail and service sectors do not pay a living wage. Economic disparities persist along racial lines, with Black and Hispanic households earning significantly less than the citywide median. Supporting small businesses, expanding workforce development, adding family wage jobs, and ensuring proximity between jobs and housing are critical to building a resilient and inclusive economy.

Safety and Social Cohesion. Public safety remains a concern, particularly with rising traffic fatalities and injuries involving pedestrians and bicyclists. Residents consistently express a desire for safer streets, more inviting public spaces, and stronger social connections. Building trust in civic institutions, fostering participation in cultural and community life, and ensuring that residents feel represented in the built environment are essential to a positive community experience.

What Key Trends Do We Anticipate Addressing over the Next 20 Years?

Vancouver's next two decades will be shaped by continued growth, demographic transition, climate impacts, and economic restructuring. The community issues we face today—housing affordability, environmental stress, inequity, and safety—are projected to intensify without decisive, coordinated planning. Looking ahead to 2045, several major trends will frame the choices before us.

- **Continued Population, Housing, and Employment Growth -** By 2045, Vancouver is projected to grow by over 81,000 new residents and will need at least 38,000 new housing units to address our existing housing deficit and meet new demand. The employment base will also need to grow by an additional 43,200 jobs to provide local employment opportunities and reduce commutes between other major employment centers in the region. Refer to Table 1 for current and projected future capacity for population, housing units, and jobs in the Vancouver area.

Table 1. 2024 Population, Housing Units, and Jobs and Projected Future Capacity

	2024	Projected Growth	2045
Population	200,000	+81,000	281,000
Housing Units	86,000	+38,000	124,000
Jobs	100,000	+43,200	143,200

- **Intensifying Housing Need, Affordability Pressures, and Displacement Risk -** Even as production increases, the need for affordable housing and supportive housing will outpace market delivery. Cost burdens are expected to grow for renters, seniors, single-person households, and Black, Hispanic/Latine, Pacific Islander, and immigrant communities. Market pressures will continue to concentrate displacement risk in areas like Fruit Valley and Fourth Plain Corridor, requiring intentional anti-displacement strategies and more robust equitable development tools.

- **Increasing Climate Hazards and Community Vulnerability -** By 2045, Vancouver is projected to experience significantly more days of extreme heat, more intense atmospheric river events, longer wildfire smoke seasons, and reduced summer stream flows. These impacts will disproportionately affect residents with lower incomes, LEP, disabilities, older adults, and households living in heat-vulnerable areas with low tree canopy. Infrastructure—particularly stormwater, water supply, energy grid, transportation corridors, and older housing stock—will require major adaptation and resilience upgrades. Vancouver will need to integrate nature-based solutions, extreme heat response systems, and community-scale resilience hubs into its long-range planning.
- **Shifting Demographics, Aging, and Changing Household Types -** The city will continue to diversify racially and culturally, with growing immigrant communities and multigenerational households. The share of seniors will rise significantly, increasing demand for accessible housing, aging-in-place options, and supportive community services. More residents will live alone, amplifying the need for social infrastructure—public spaces, libraries, neighborhood centers, cultural hubs, and inclusive civic life—to reduce isolation and strengthen community belonging.
- **Transforming Economy and Labor Market -** Vancouver's economy is increasingly bifurcated, with large numbers of higher-wage jobs in healthcare, technology, engineering, creative industries, and professional services, as well as lower wage service sector jobs. Traditional manufacturing, logistics, and construction—industries where Vancouver doesn't perform well relative to the overall region—will remain essential to providing living-wage jobs for residents without postsecondary education. Remote and hybrid work will continue influencing where people live and how they travel, increasing demand for flexible workspaces, neighborhood-serving services, and multimodal infrastructure. As commercial redevelopment accelerates, the City will need to strategically manage finite employment land, support small businesses, foster entrepreneurship, and expand opportunities for workforce development.
- **Greater Emphasis on Safe, Connected, Low-carbon Mobility -** Traffic fatalities and serious injuries—especially those impacting pedestrians—are likely to rise without significant safety investments. Over the next two decades, Vancouver must find ways to shift travel behavior to more climate-friendly options, such as walking, rolling, cycling, and transit. Electrification of transportation, expansion of active transportation networks, and redesign of high-injury corridors throughout the city will be critical to both safety and climate goals.
- **Growing Expectations for Equity, Representation, and Community Voice -** Community expectations for repair of past harms, culturally responsive government, and equitable investment will continue to grow. Residents increasingly expect transparent data, meaningful power-sharing, and policies that correct historical inequities in housing, environmental conditions, transportation access, and economic opportunity. Over the next 20 years, Vancouver will need to strengthen partnerships with neighborhood organizations, cultural communities, Tribes, and community-based groups to co-create solutions and ensure a sense of community ownership and buy-in.

Role of the Comprehensive Plan

Comprehensive Plans are the centerpiece of local planning efforts and are a foundational tool for shaping outcomes in the built and natural environment and addressing the key issues a community faces. These 20-year plans articulate a community vision through a series of goals, policies, and actions that guide the day-to-day decisions of elected officials and local government staff. While growth and change have and will always be a part of our lives, Comprehensive Plans are created by local governments with the community to help coordinate and plan for that growth, establish common goals, support the environment, and support our collective health, safety, and high quality of life.

The City of Vancouver is required to develop a Comprehensive Plan under Washington's Growth Management Act (GMA), with specific requirements outlined in Revised Code of Washington (RCW) Section 36.70A. First adopted in 1994 and updated in both 2004 and 2011, Vancouver's Comprehensive Plan has evolved alongside the city's growth, setting the policy framework for urban centers, housing diversity, and service provision. This updated plan extends the community vision to 2045 and establishes goals, policies, and actions that better address the issues and trends outlined above.



Community Vision Statement

"Vancouver is an equitable and prosperous community, which ensures that all residents, businesses and organizations benefit from the growth and advancement we make together.

Vancouver will be recognized for our quality of life, as evidenced by affordable housing in vibrant, safe and walkable neighborhoods, access to jobs and economic opportunity for all, and leading-edge efforts to address climate change."

How the Plan Is Structured

This Comprehensive Plan is centered around the plan's **community vision statement**. The vision statement is the result of a detailed visioning process, which engaged more than 1,000 community members between June 2022 and February 2023. The plan vision statement serves as the basis from which all other goals and policies in the plan are developed. Each of the plan's chapters and corresponding goals were developed from input received during phase I engagement and guidance

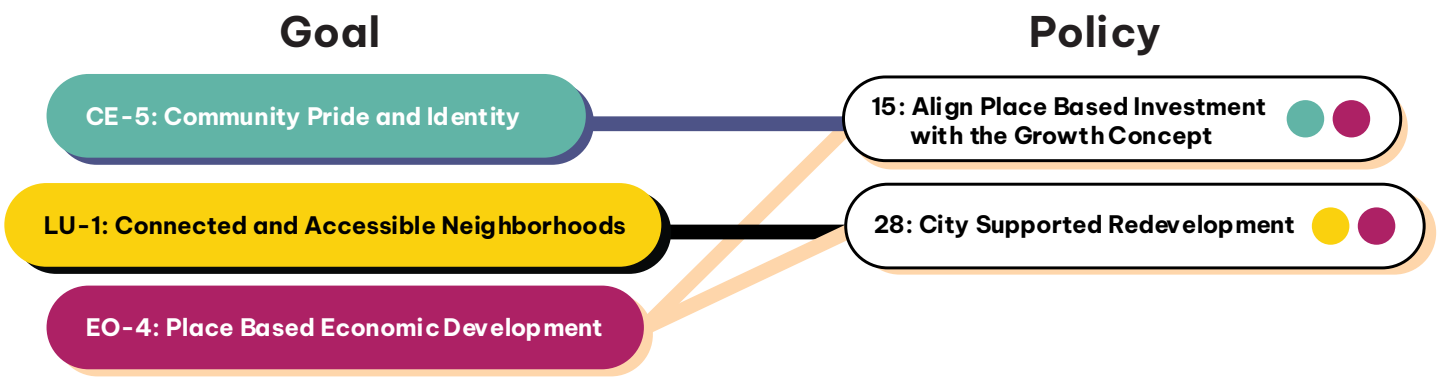
provided by the plan's *Community Partners*, the primary community advisory group tasked with co-creation of the plan with City staff. This goals framework was endorsed by City Council early in the process, and can be found in Exhibit L. The Plan is organized into the following chapters; see Figure 1. Each chapter also has its own vision statement, as well as a set of goals associated with that chapter.

Figure 1. Comprehensive Plan Chapters



Each goal is described in the relevant chapter and includes a list referencing the policies that support the goal. Because community priorities are interconnected, most policies end up supporting multiple goals and are repeated under multiple goals throughout the plan. See Figure 2. Applying policies to multiple goals helps strengthen the connections between what we want to achieve (i.e., the vision and goals) and what we need to do to get there (i.e., the policies and actions).

Figure 2. Interaction of Goals, Policies, and Actions







Community Engagement

Each chapter of the Comprehensive Plan includes a Community Feedback callout box that highlights key themes heard from the community and shows how that input informed plan direction. Community engagement and outreach were conducted throughout the Comprehensive Plan update process in a multi-year effort, beginning with visioning in 2023, advancing through development of Land Use Alternatives in 2024 and the Preferred Alternative in 2025, and concluding in Spring 2026 with public review of the draft plan and zoning code. This process was designed to center equitable engagement, elevate community voices, and ensure that lived experiences informed policy development.

In total, more than 2,000 people were directly engaged through over 200 meetings, events, workshops, and outreach activities, and more than 1,900 ideas and comments were received. Engagement occurred through a variety of formats to reach people across different communities, including:

- Public meetings, small-group discussions, and community events, including forums, tabling, and neighborhood-based outreach
- Interactive mapping activities and online engagement tools to gather place-based input
- Community Partner and Community Working Group meetings that supported a co-creative planning process
- Workshops with City boards, commissions, Planning Commission, and City Council, where community members could provide testimony and feedback
- Broad digital and citywide outreach, including surveys, StoryMap engagement, newsletters, and social media

- Presentations to community and business organizations, neighborhood associations, schools, service providers, and other public agencies.

This layered approach allowed the City to gather both broad and in-depth feedback, reaching thousands more community members through online platforms and citywide communications . A deeper dive into engagement methods, participation, and key themes can be found in Appendix K: Public Involvement Plan and Appendix M: Engagement and Outreach Summary.



Related Plans and Policies

Related plans and policies provide background information and policy directives that inform and support Comprehensive Plan analyses, goals, policies and implementation steps.

*Adopted by Reference: some Plans listed below fulfill statutory requirements of Comprehensive Planning under the Growth Management Act. The Adopted by Reference notation refers to the most current version of each plan, as subsequently amended from time to time.

Appendix A. Related Plans and Policies

- 2023-2029 Strategic Plan
- Climate Action Framework (CAF), adopted 2022*
- Electric Vehicle Strategy, anticipated adoption 2026
- Housing Action Plan
- Reside Vancouver Anti-Displacement Plan, 2023
- City of Vancouver 2019-2023 Consolidated Housing and Community Development Plan, and 2025 Action Plan
- 2022-2031 Vancouver Parks, Recreation and Cultural Services (VPRCS) Comprehensive Plan*
- Culture Arts and Heritage Plan, adopted 2018
- Five-Year Economic Development Strategy, adopted 2025
- 2024-2044 Transportation System Plan (TSP), adopted 2024*
- 2026-2031 Transportation Improvement Program (TIP)
- Stormwater Management Program Plan (SWMP Plan), adopted 2025
- 2011 General Sewer Plan, update in process, adoption anticipated 2026-2027
- 2026-2031 Water, Sewer and Surface Water Capital Improvement Program (CIP)
- 2016 Comprehensive Water System Plan, amended 2022, update in process, adoption anticipated 2026-2027
- Long Range Facilities Plan, adopted 2024
- VPS 6-year Capital Facilities Plan
- EPS Building Locations
- Urban Forestry Management Plan (UFMP), adopted 2023*
- Shoreline Master Program, adopted 2011, last amended 2021
- Critical Areas Ordinance, adopted 2024
- Subarea and District Plans*
- Other Jurisdiction and Agency Policies
- Countywide Planning Policies*

Glossary

Below are key terms and acronyms that are used frequently throughout this plan:

Accessory Dwelling Unit (ADU) - A dwelling unit located on the same lot as a single-family housing unit, duplex, triplex, fourplex, townhome, or rowhome. An attached ADU is located within or attached to a housing unit. A detached ADU is a unit that is separate from a housing unit and is on the same property. ADUs expand housing options and provide lower-cost, smaller-scale homes within established neighborhoods.

Active Transportation –Primarily human-powered travel, such as walking, bicycling, rolling, or using mobility devices, including those with electric assistance, pursuant to RCW 36.70A.030. Active transportation networks improve health, reduce emissions, and support more sustainable travel choices.

Active Trip Potential (ATP) - A measure of the likelihood that people will walk, roll, or bike based on surrounding land uses, street conditions, and access to destinations. ATP helps identify areas where investments in active transportation would be most effective.

Adaptive Capacity - A community's ability to adjust, respond, or adapt to climate impacts, environmental changes, or other stresses. Higher adaptive capacity reduces vulnerability and supports long-term resilience.

Affordable Housing – Housing that is priced so that residents can still afford other essential needs such as food, healthcare, transportation, and savings. Housing is generally considered affordable when costs, including utilities, do not exceed 30 percent of a household's income.

- Affordable housing may be **income-restricted**, meaning it serves households at or below certain income levels, and often relies on public funding to keep costs affordable.
- **Naturally occurring affordable housing** refers to housing that is not income restricted but still affordable at a given income level, typically smaller and older housing units.
- **Workforce Housing refers** to housing that is affordable (costs no more than 30 percent of household income) to households that earn between 80 and 120 percent of the area median income and still allows them to afford other basic needs, such as food, healthcare, transportation, and savings.

Aging in Place - The ability for older adults to remain in their homes and communities safely and comfortably as they age. This relies on accessible housing, supportive services, transportation options, and age-friendly neighborhood design.

Air Quality - A measure of the concentration of pollutants—such as particulate matter, ozone, and other contaminants—in the air people breathe. Good air quality is essential for public health and is influenced by transportation, industry, wildfires, and climate conditions.

Annexation - The legal process by which a city expands its boundaries to include adjacent unincorporated areas of land into the municipality. Annexation supports orderly growth, consistent service delivery, and alignment with long-range planning under the Growth Management Act.

Annexation Agreement - A negotiated agreement between a city and property owners, or between jurisdictions, outlining the terms, services, and responsibilities associated with annexing land. These agreements help ensure predictable transitions for infrastructure, governance, and land use regulation.

Area Median Income (AMI) - The midpoint of household incomes in a region, as defined and calculated annually by the U.S. Department of Housing and Urban Development. AMI is used to determine eligibility for affordable housing programs and income-restricted units.

Bus Rapid Transit (BRT) - A high-capacity transit service that uses dedicated lanes, frequent service, enhanced stations, and transit priority treatments to provide faster and more reliable bus travel. In Vancouver, C-TRAN operates the Vine as Clark County's only BRT system.

Capital Facilities Plan (CFP) - A long-range plan that identifies major public physical infrastructure needs, including utilities, transportation, parks, and public buildings, and outlines funding strategies. CFPs include municipal and non-municipal infrastructure project plans in detail for a six-year period and more generally over the remainder of the 20-year planning period, pursuant to RCW 36.70A.070(3).

Carbon Emissions - Greenhouse gases (GHG), primarily carbon dioxide and methane, released through transportation, buildings, industry, and other human activities. Reducing carbon emissions is essential for mitigating climate change and improving long-term environmental health.

Circular Economy – An economic system aimed at eliminating waste and keeping materials and products in use for as long as possible. In Vancouver's context, this includes local sourcing, recycling and reuse, low-carbon construction, and minimizing emissions across supply chains.

Climate Action Framework - The City of Vancouver's strategic plan for reducing GHG emissions and transitioning toward a low-carbon, sustainable future. Adopted in 2022, the Climate Action Framework outlines goals, actions, and performance measures that guide policy, investments, and community partnerships to mitigate climate change and support long-term resilience.

Climate Exposure - The degree to which people, infrastructure, or natural systems are subjected to climate-related hazards, such as extreme heat, flooding, wildfire smoke, or drought. Exposure is a key component of climate vulnerability assessments.

Climate Refugia - Areas that are more protected from climate impacts—such as cooler, shaded, or well-watered environments—that provide safe habitat for people, plants, and wildlife during extreme conditions. Protecting refugia helps support long-term ecological and community resilience.

Climate Resilience - A community's ability to withstand, adapt to, and recover from climate-related disruptions. Resilience planning includes reducing risk, strengthening infrastructure, and building social and economic systems that can support residents during climate stressors.

Climate Vulnerability Index - A data-based tool that identifies where people and places in the city are most vulnerable to climate hazards by combining exposure, sensitivity, and adaptive capacity indicators. The Climate Vulnerability Index helps prioritize investments in high-risk neighborhoods. The index is referenced throughout the Climate Vulnerability Assessment.

Community Development - The set of policies, programs, and investments that shape the physical, economic, and social well-being of neighborhoods. Community development focuses on equitable access to housing, services, infrastructure, and opportunities.

Community Experience - The lived experience of residents as they interact with their neighborhoods, public spaces, services, and each other. Planning for community experience emphasizes belonging, safety, cultural identity, and everyday quality of life.

Community Spaces - Publicly accessible spaces that support social interaction. Includes both publicly owned and privately owned areas and both indoor and outdoor facilities, such as parks, plazas, open spaces, community centers, and neighborhood-serving businesses. Generally synonymous with "community gathering spaces" and "third places" for purposes of this plan.

Complete Streets - A design approach that ensures streets are safe and comfortable for all users—people walking, rolling, biking, taking transit, and driving—regardless of age or ability. Complete Streets support multimodal mobility, safety, and healthy communities.

Comprehensive Plan – A local jurisdiction's blueprint for managing growth, land use, housing, transportation, climate resilience, parks, natural area protection, and public facilities and services over a 20-year period developed and adopted in accordance with the Washington GMA. The plan provides policy direction, regulatory guidance, and a shared vision for the city's future.

Connected and Accessible Neighborhood - A neighborhood where residents can conveniently reach daily needs—such as shops, parks, transit, and schools—through safe walking, biking, rolling, and transit connections. These neighborhoods support health, affordability, and reduced carbon emissions.

Criteria Pollutant - A pollutant regulated under the Clean Air Act, such as ozone, particulate matter, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead, due to their known health effects. Tracking criteria pollutants helps communities monitor and improve air quality.

Critical Areas Ordinance (CAO) - Local regulations that protect environmentally sensitive areas, such as wetlands, areas with critical recharging effect on aquifers used for potable water, floodplains, geologically hazard areas, and fish and wildlife habitat. The Critical Areas Ordinance ensures development avoids or mitigates impacts to critical natural systems.

Cultural Displacement - The loss of cultural identity and community cohesion that occurs when longtime residents or native communities can no longer afford to live in or operate businesses in their neighborhoods or on their ancestral lands. Cultural displacement often accompanies economic or demographic shifts and is a key equity concern.

Cumulative Impacts - The combined effect of multiple past, present, and future actions—such as pollution, land-use decisions, or infrastructure investments—on community health and environmental conditions. Cumulative impacts assessments help identify places facing disproportionate burdens.

Density (Housing or Job Density) - A measure of how many housing units or jobs are located within a specific area, typically expressed as units or jobs per acre. Density helps guide land use decisions, infrastructure planning, and the creation of walkable, transit-supportive neighborhoods.

Disparities: Measurable differences in outcomes between population groups, including differences in health, economic conditions, well-being, environmental exposure, and access to housing, services, resources, and opportunities.

- **Racial disparities:** Differences in outcomes across racial groups.
- **Economic disparities:** Differences in income levels and related economic indicators.

Displacement (Gentrification) - The process in which rising property values and neighborhood investment lead to the involuntary movement of lower-income residents as wealthier households move in. Gentrification-related displacement typically reflects broader economic pressures and inequities in housing systems.

Displacement Risk Assessment - An analysis used to identify communities most vulnerable to displacement due to market pressures, policy changes, or public and private investments. These assessments guide anti-displacement strategies and inform equitable planning decisions.

Economic Mobility - The ability of individuals and households to improve their economic status over time through access to education, jobs, housing, and community resources. Cities promote economic mobility by expanding pathways to stable, living-wage employment and reducing systemic barriers.

Economic Opportunity - The availability of jobs, business resources, and supportive conditions that allow residents and local firms to thrive. Economic opportunity is strengthened by workforce development, small business support, equitable access to capital, and the creation of high-quality employment centers.

Embodied Carbon - The total carbon emissions associated with the extraction, production, transportation, and installation of materials used in construction, production, and manufacturing. Reducing embodied carbon supports both climate goals and local economies when materials are sourced regionally.

Emergency Shelter - Short-term, temporary housing that provides immediate, safe accommodations for individuals and families experiencing homelessness or crisis. Emergency shelters often include supportive services to help stabilize residents and connect them with long-term housing options.

Employment Land - Land designated for commercial, industrial, office, or mixed-employment uses that support jobs and economic activity. Employment lands ensure that cities have adequate space to accommodate future job growth and business development.

Entrepreneurship/Startup Ecosystem - The network of entrepreneurs, small businesses, support organizations, investors, educational institutions, and services that nurture innovation and new business creation. A strong startup ecosystem generates local jobs and drives economic diversification.

Environmental Impact Statement (Draft EIS) - A detailed environmental review document prepared under the State Environmental Policy Act (SEPA) that evaluates the potential environmental impacts, alternatives, and mitigation measures of a proposed plan, policy, or project. The Draft EIS is released for public and agency review to gather comments before selecting a Preferred Alternative and finalizing the analysis.

Environmental Impact Statement (Final EIS) - The completed environmental review required by SEPA that responds to public and agency comments on the Draft EIS and identifies a Preferred Alternative, and provides refined analysis, mitigation measures, and a summary of the decision-making process. The Final EIS informs the adoption of major plans or actions.

Environmental Justice - The principle that all people should benefit equally from environmental protections and not bear disproportionate environmental harms. It means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities, the equitable distribution of resources and benefits, and eliminating harm. Environmental justice ensures fair treatment and meaningful involvement in decisions affecting community health.

Equality - The condition in which all people have the same resources or opportunities. While equality focuses on uniform distribution, it may not account for differing needs or historical inequities.

Equitable Development - Development that intentionally reduces disparities by ensuring that the benefits of growth—such as housing, jobs, transportation, and amenities—are shared by all residents, especially communities historically excluded from opportunity. Equitable development makes adequate provisions for all economic segments of the community and is supported by anti-displacement policies and inclusionary zoning.

Equity - The principle of distributing resources, opportunities, and support based on need so that all individuals can achieve fair outcomes. Unlike equality, equity recognizes structural inequities and adjusts approaches to address them.

Equity Index - A local data-driven tool, developed and maintained by the City, that maps and measures disparities across neighborhoods—such as income, housing stability, health, transportation access, and environmental conditions. The index helps the City identify Equity Priority Communities and guide targeted investments.

Equity Priority Communities - Groups identified in compliance with the Washington Law Against Discrimination (Chapter 49.60 RCW) that have been historically or systematically excluded from

economic, political, or social opportunities due to race, ethnicity, immigration status, income, disability, gender identity, or other identity factors. Vancouver's Equity Priority Communities include BIPOC, Latino/a individuals, LGBTQ+ individuals, people with low incomes, people with disabilities, youth and children, renters, people experiencing homelessness, small business owners, refugees, undocumented populations, and formerly incarcerated community members.

Essential Spaces - A planning framework used in the Vancouver Parks, Recreation & Cultural Services (VPRCS) Comprehensive Plan that recognizes parks, recreation facilities, trails, natural areas, and cultural spaces as critical public assets essential to community health, equity, environmental resilience, economic vitality, and quality of life. Essential Spaces provide physical, mental, social, and cultural benefits and are foundational to a thriving and inclusive city.

Exposure (Climate) - The degree to which people, buildings, and natural systems are subject to climate hazards, such as extreme heat, drought, flooding, or wildfire smoke. Exposure is one of three components of climate vulnerability, along with sensitivity and adaptive capacity.

Extreme Heat - Unusually high temperatures that pose risks to human health, infrastructure, and ecosystems, compared to average weather or historic trends. Extreme heat events are intensifying due to climate change and disproportionately impact vulnerable populations.

Floodplain - Low-lying land adjacent to a river, stream, or waterbody that is prone to flooding during storms or seasonal high-water events. Floodplain management reduces risks to people, property, and ecological systems.

Floor Area Ratio (FAR) - A measure of building intensity calculated by dividing a building's total floor area by the size of the lot it is built on. FAR helps regulate the scale of development and guide urban form.

Form-based Code - A land use regulation that emphasizes building form, design, and the public realm rather than separating uses. Form-based codes create predictable, human-scaled environments, and support walkability and mixed-use development.

Green Infrastructure - Nature-based systems—such as trees, rain gardens, wetlands, and permeable surfaces—that manage stormwater, reduce flooding, improve air quality, and enhance urban habitat. Green infrastructure provides ecological and community co-benefits.

Green Space - Vegetated or natural areas, publicly or privately owned, that provide ecological, climate, health, and community benefits. Green Space supports climate resilience and environmental equity by reducing urban heat, managing stormwater, improving air and water quality, supporting biodiversity, and providing access to nature.

Greenhouse Gas (GHG) – Gases, including carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and others designated by the Washington State Department of Ecology (Ecology) pursuant to RCW 36.70A.45.010, that trap heat in the atmosphere and contribute to climate change. Reducing GHG emissions is a key goal of climate action planning.

Growth Management Act (GMA) - Washington State's legal framework for coordinated land use planning, requiring fast-growing communities to plan for housing, transportation, environmental protection, and public services within designated Urban Growth Areas (UGAs) as set forth in Chapter 36.70A RCW.

Health Disparities - Differences in health outcomes between groups that stem from inequitable social, economic, and environmental conditions. Planning, public health, and community investment can help reduce these disparities.

Health Impact Assessment (HIA) - A structured process and evaluation tool that was used to evaluate the potential health effects of the Comprehensive Plan and the Preferred Land Use Alternative. Health Impact Assessments help integrate health considerations into decision making and support more equitable outcomes.

Heat Island - The phenomenon where urbanized areas become significantly warmer than surrounding rural areas due to heat-absorbing surfaces like pavement and rooftops. Reducing heat island effects improves public health and climate resilience.

Historically Marginalized Communities - Communities that have experienced systemic exclusion or discrimination—often based on race, ethnicity, income, disability, or immigration status—and face disproportionate barriers to opportunity. Planning processes prioritize their inclusion and protection.

House Bill (HB) - Legislation introduced in the Washington State House of Representatives. House Bills often establish or modify requirements for local planning, housing, climate policy, or municipal operations.

Housing Cost Burden - A condition in which a household spends more than 30 percent of its income on housing costs, including rent, mortgage payments, and utilities. Severe cost burden occurs when housing costs exceed 50 percent of household income.

Housing Tenure - Whether a household owns or rents its home. Housing tenure patterns help identify stability, affordability challenges, and long-term housing needs.

Impervious Surface - A surface—such as pavement, concrete, or rooftops—that prevents water from soaking into the ground. Impervious surfaces increase stormwater runoff, flooding risk, and heat island effects.

Inequities - The uneven distribution of investment, resources, and environmental hazards across communities, resulting from exclusionary policies, practices, and processes. Historical, structural, and systemic inequities represent compounding layers of injustice where past discrimination (historical) is embedded into laws and policies (structural), creating a pervasive, self-reinforcing system (systemic) that disadvantages specific groups.

Infill Development - New development or redevelopment on underused or vacant land within smaller, already-urbanized areas. Infill supports efficient land use, reduces sprawl, and promotes walkability.

Innovation - The creation and application of new ideas, technologies, or practices that improve processes, products, or community outcomes. Innovation in planning often involves creative problem-solving, emerging tools, and partnerships that generate new opportunities.

Intergovernmental Agreement - A formal agreement between jurisdictions—such as cities, counties, or special districts—defining shared responsibilities, service provision, or coordinated planning. Intergovernmental Agreements support efficient governance and consistency across boundaries.

Intensity (Land Use) - The degree of development or activity allowed on a property, often measured through building height, FAR, lot coverage, or employment density. Intensity helps shape the character of districts and supports transit-oriented, walkable communities.

Jobs-to-Housing Ratio - A comparison of the number of jobs to the number of housing units in a community, used to assess the balance between employment and residential opportunities. A well-balanced ratio can reduce commute times, support economic vitality, and promote sustainable land use.

Land Use - The arrangement and designation of different types of activities—such as housing, employment, parks, and commercial uses—within a community. Land use planning guides where growth occurs to support efficient infrastructure, environmental protection, and community goals.

Level of Service (LOS) - A performance measure that evaluates how well transportation, utilities, or public services operate relative to established standards. LOS helps determine where improvements are needed to maintain safety, efficiency, and quality of service.

Living-wage Job - A job that pays enough for a worker to meet basic needs, such as housing, food, childcare, transportation, and healthcare, without public assistance. This amount varies by household size and local cost of living.

Low-income Household - A household earning below 80 percent of the area median income (AMI), as defined by federal or state guidelines. Low-income households often face housing affordability challenges and benefit from targeted programs and investments.

Middle Housing - Housing types such as duplexes, triplexes, fourplexes, courtyard apartments, townhomes, and cottage clusters that fall between single-family homes and larger multifamily buildings. Middle housing expands attainable, neighborhood-scale options in residential areas.

Mitigation Measures - Actions that avoid, reduce, or compensate for negative environmental, social, or economic impacts of a proposed project or policy. Mitigation is required under SEPA to ensure impacts are responsibly managed.

Mixed-Use Development - Development that blends residential, commercial, office, or civic uses within the same building or site. Mixed-use areas support walkability, reduce reliance on driving, and create vibrant, connected neighborhoods.

Mobility - The ability of people to move safely and efficiently throughout the transportation system using a variety of travel modes. Mobility reflects access, convenience, travel options, and the overall function of the street network.

Multimodal Transportation - A transportation system that supports multiple ways of traveling—walking, biking, rolling, transit, rideshare, and driving. Multimodal systems enhance accessibility, safety, and sustainability.

Overburdened Communities - Communities that experience disproportionately high environmental, health, and socioeconomic burdens due to historical inequities, disinvestment, and cumulative impacts. These areas are prioritized for equitable investment and pollution reduction.

Particulate Matter - Small airborne particles, including dust, soot, and smoke, that can be inhaled deep into the lungs and cause health problems. Fine particulate matter (PM2.5) is a key pollutant monitored for air quality and public health.

Parks Classification - A system used to categorize parks and recreation spaces based on size, function, service area, and amenities. In Vancouver, park classifications—including Neighborhood Parks, Community Parks, Regional Parks, Natural Areas, Civic Plazas, Linear Parks, and Special Facilities—guide land acquisition, design standards, service expectations, and investment decisions.

Parks Demand - The total amount of local parkland acreage needed to serve the existing or projected population based on adopted LOS standards. Parks demand represents the theoretical amount of land required to meet service goals, assuming no existing park inventory.

Parks Need - The difference between Parks Demand and the existing inventory of parkland and developed facilities. Parks Need identifies how many additional acres must be acquired or developed to meet adopted LOS standards and is used to prioritize land acquisition, capital projects, and funding strategies.

Parks, Recreation, and Cultural Services Comprehensive Plan - The City's long-range plan that guides the development, maintenance, and programming of parks, recreation facilities, cultural spaces, and natural areas. It identifies community needs, sets service standards, and outlines capital and operational priorities to ensure an equitable, accessible, and high-quality parks and recreation system.

Periodic Update - A required update to a city's Comprehensive Plan and development regulations under the GMA, occurring on a periodic cycle, typically at least every 10 years pursuant to RCW 36.70A.140. The update ensures that planning documents remain current with state laws, projections, and community priorities.

Permanent Supportive Housing (PSH) - Subsidized, long-term housing paired with voluntary, support services for people experiencing chronic homelessness or who have disabilities. Permanent Supportive Housing helps residents stabilize, maintain housing, and improve health and well-being.

Place-based Investment - Strategic investment in specific geographic areas—such as business districts, corridors, or neighborhoods—that builds on local assets and addresses local needs. This approach connects to Vancouver's land use policies and is often used to stabilize or uplift areas facing disinvestment or gentrification pressure.

Potable Water Supply - Water that is treated and safe for human consumption, used for drinking, cooking, and sanitation. Managing potable water ensures reliable service and protects public health.

Preferred Alternative - The option identified by the lead agency (City of Vancouver) in the EIS as best meeting the project's purpose, need, and policy objectives, taking into account environmental impacts, feasibility, and public input. The Preferred Alternative is evaluated in both the Draft and Final EISs and typically becomes the basis for final plan adoption or project implementation.

Public Spaces - Publicly owned areas that are accessible to the public, such as streets, sidewalks, parks, trails, natural areas, libraries, and community centers.

Racially Disparate Impacts (RDI) - Outcomes in which policies or systems disproportionately disadvantage one or more racial groups, regardless of intent. RCW 36.70A.070 requires identifying local policies and standards with potential racially disparate impacts and ways of beginning to undo those impacts.

Redevelopment - The process of replacing, expanding, or intensifying use on previously developed land. Redevelopment supports infill growth, revitalization, and efficient use of existing infrastructure.

Revised Code of Washington (RCW) - The collection of all permanent laws enacted by the Washington State Legislature. RCWs direct local planning, housing, environmental regulation, and municipal operations.

Right-of-Way (ROW) - Land dedicated for public transportation purposes, such as streets, sidewalks, bike lanes, and utilities. The right-of-way provides space for mobility, infrastructure, and public access.

Severe Cost Burden - A condition in which a household spends more than 50 percent of its income on housing costs. Severe cost burden significantly limits a household's ability to pay for other essential needs.

Shoreline Management Act - A state law set forth in Chapter 90.58 RCW governing the use and protection of shorelines, requiring local governments to balance environmental protection, public access, and water-dependent uses. The Act guides the development of local Shoreline Master Programs.

Shoreline Master Program (SMP) - A local plan and regulatory framework required under the State Shoreline Management Act to guide development, restoration, and public access along shorelines. Vancouver's Shoreline Master Program ensures shoreline uses are environmentally responsible and publicly beneficial.

Smoke Exposure - Exposure to wildfire or woodsmoke that can degrade air quality and pose significant health risks. Communities with vulnerable populations or limited cooling resources face greater smoke-related impacts.

Social Determinants of Health (SDOH) - The conditions in which people live, work, learn, and play that shape health outcomes—including housing stability, transportation access, education, income, and environmental quality. Addressing Social Determinants of Health improves health equity across neighborhoods.

Social Infrastructure - The network of places, institutions, and community assets—such as parks, libraries, schools, arts spaces, and neighborhood centers—that bring people together and support social connection. Strong social infrastructure fosters community resilience and belonging.

State Environmental Policy Act (SEPA) - Adopted by the Washington legislature in 1971, this law requires state and local agencies to identify and evaluate environmental impacts of proposed projects and non-project actions, mitigation measures and alternatives, prepare environmental documents that outline these findings in a concise and clear way, and involve the public in decision-making processes.

Stormwater System - The infrastructure that collects and manages precipitation runoff, including pipes, ditches, catch basins, and green stormwater facilities. Effective stormwater systems reduce flooding, protect water quality, and support climate resilience.

Sweat Equity - The value added to a property or business through personal labor and time, rather than direct financial investment. In community development, sweat equity can be a tool for building ownership and wealth among those without traditional access to capital.

Tenant Protections - Policies that help renters maintain stable housing—such as notice requirements, anti-discrimination rules, and protections against unfair eviction. Tenant protections support housing stability and reduce displacement risk.

Transit-oriented Development (TOD) - Compact, walkable, mixed-use development located near high usage transit facilities. Transit-oriented development supports transit ridership, reduces vehicle use, and creates vibrant, connected communities.

Transportation Improvement Program (TIP) - A short-range financial plan identifying transportation projects to be implemented by the City over a set period, typically four to six years. The TIP directs funding toward priority multimodal and safety improvements.

Transportation System Plan (TSP) - The City of Vancouver's long-range plan for managing and investing in the transportation network, including roads, transit, bike, and pedestrian systems, and freight corridors. The policies, programs, and projects identified within it supports mobility, safety, sustainability, and growth management.

Tree Canopy - The layer of leaves and branches formed by trees that cover the ground when viewed from above and provides shade, cooling, habitat, and air quality benefits. Tree canopy coverage is essential for reducing heat island effects and improving neighborhood health.

Universal Design - A design approach that ensures buildings, streets, and public spaces are usable by people of all ages and abilities without the need for adaptation. Universal Design enhances accessibility, safety, and inclusivity.

Urban Forestry - The planning, establishment, management, stewardship, and expansion of trees and associated plants, whether in small groups or forested areas, within the urban environment. Urban forestry enhances ecological health, climate resilience, and community well-being.

Urban Growth Area (UGA) – The area designated under the GMA generally characterized by urban or urbanizing development and services and containing a city anticipated to grow into and annex over the long term.

Vehicle Miles Traveled (VMT) - The total number of miles driven by auto and small truck vehicles in a given area over a set time period. Reducing VMT supports climate goals, improves air quality, and promotes more sustainable transportation choices.

Vancouver Parks, Recreation & Cultural Services (VPRCS) - The City of Vancouver department responsible for the planning, development, operation, and maintenance of parks, recreation facilities, trails, natural areas, and cultural services. VPRCS manages the City's park system and implements policies, programs, and capital investments that support recreation, community health, environmental stewardship, and cultural expression.

Wastewater System - The infrastructure that collects, conveys, and treats sewage from homes and businesses. Proper wastewater management protects public health and environmental quality.

Water System (Potable/Drinking Water) - The network of pipes, pumps, treatment facilities, and reservoirs that provides safe drinking water to homes and businesses. A resilient water system ensures reliable service and protects community health.

Washington Administrative Code (WAC) - The compilation of rules and regulations adopted by state agencies to implement state law. WACs provide detailed guidance for local planning, environmental review, and municipal operations.

Workforce Development - Programs and partnerships that prepare people for employment through training, education, apprenticeships, and job placement—with an emphasis on family-wage opportunities and long-term career pathways.

Workforce Housing - Housing that is affordable to households earning moderate incomes, and often located near employment centers. RCW 36.70.A.835 defines workforce housing as affordable to households earning 80 percent of the Area Medium Income (AMI) in the case of rental housing, and 100 percent of AMI in the case of owner-occupied housing.



Community Experience

1

OUR VANCOUVER

Introduction

This chapter is intended to be a lens for considering how decisions about the built and natural environment will impact the way people feel in their day-to-day experience in the city. It encompasses the social connections that shape daily life, the aesthetics and visual identity of neighborhoods, the public spaces where people gather, and how the built environment impacts people's sense of belonging and safety and the identity of the city overall. It is an experiential lens to inform policy making that asks the following question: *What is it like to live in this place?*

This chapter sets the foundation for the Comprehensive Plan by framing the human experience as a central planning priority. It focuses on what it feels like to be in Vancouver, to encounter one another and to move through shared spaces, and places community experience at the heart of achieving policy outcomes related to safety, equity, inclusion, and social well-being.



Vision: Community Experience

We envision a city that is affordable, safe, accessible, vibrant, and prosperous, where all community members feel valued, included, and honored. Our city is made up of authentic places that reflect our different histories and lived experiences and help strengthen social bonds and connections to each other. We recognize that our histories include big accomplishments and important milestones, as well as individual and collective trauma and systemic injustice, and we will work to intentionally repair past harms and limit future ones. We uplift individuals and communities to collectively build a future where we not only survive but thrive, so that every person can lead a fulfilling life and truly belong.

Changing Demographics

Vancouver's demographic landscape is shifting in ways that directly shape how people participate in civic life and form social connections. The city added just over 56,000 residents between 2000 and 2023, a 39 percent increase that has expanded the scale and diversity of the community. This growth has been accompanied by an aging population and changes in household composition that influence how residents engage with one another. The share of residents 65 and older increased from 13 percent to 19 percent between 2011 and 2021, while the share of youth under 20 declined from 25 percent to 20 percent over the same period. At the same time, the city's largest age cohort—residents aged 20 to 34, who make up 24 percent of the population—is also the group most likely to be newcomers to Vancouver, renters, or early-career workers whose civic engagement patterns are often still forming. These shifts mean Vancouver now includes larger proportions of older adults at increased risk of social isolation, as well as young adults who may lack long-term social networks, extended family nearby, or established pathways into community life.

Household patterns reinforce these dynamics. The Housing Needs Assessment shows that Vancouver's average household size has decreased from 2.4 to 2.3 persons over the last decade, with a seven-percentage-point decline in households with children and corresponding increases in one- and two-person households. These trends reflect broader shifts in aging, affordability pressures, delayed household formation, and diverse living arrangements, and they carry implications for civic and social life. Smaller households have fewer built-in social networks and tend to rely more on community centers, third places, and neighborhood institutions to build connection and access information. Vancouver's racial and ethnic diversity also continues to grow—communities of color increased from 24 to 33 percent of the population from 2011 to 2021—which brings cultural vibrancy but also requires civic systems that are linguistically and culturally accessible to ensure full participation. Economic disparities further shape engagement conditions. Vancouver's median household income—$70,000, compared to the county's $84,000—creates a higher share of residents who are cost-burdened, renters, or working multiple jobs. Residents facing financial stress have less discretionary time for civic involvement and may have fewer resources to participate in leadership roles, neighborhood associations, or volunteer opportunities.

Together, these demographic realities reveal a community where social connection is unevenly distributed and where barriers to civic participation are often tied to age, income, renter status, language, cultural identity, and the availability of accessible gathering spaces. Older adults may experience isolation if mobility or fixed incomes limit their access to community life. Younger adults may experience disconnectedness during transitional phases in work or housing. Immigrant and multilingual households may face linguistic or cultural barriers that impede civic involvement unless outreach is tailored. These trends underscore the importance of robust social infrastructure as the connective tissue of a rapidly growing and increasingly diverse city, and underscores the importance of parks, libraries, plazas, community centers, local businesses, cultural hubs, and informal gathering spaces that serve as the everyday platforms where civic life becomes possible, trust is built, and social isolation is countered.

Representation & Belonging

Representation is a foundational component of community experience. It reflects who is present in Vancouver, whose voices shape decisions, and whose identities, cultures, and histories are visible in the built environment, civic processes, and public life. A community where people can see themselves reflected—in leadership, public spaces, art, businesses, and decision-making—fosters a stronger sense of belonging, trust, and shared ownership of place.

Vancouver is a growing and increasingly diverse community. As of recent estimates, more than 30 percent of residents identify as people of color, a notable increase over the past decade, alongside continued growth in Hispanic/Latine, Native Hawaiian and Pacific Islander, and multiracial populations. The city is also home to a significant number of renters, young adults, single-person households, and LGBTQ+ residents. At the same time, disparities in income, housing access, environmental conditions, and access to services continue to vary across communities, particularly along lines of race, income, and geography. These patterns underscore that while Vancouver is diverse, representation in opportunity, outcomes, and decision-making historically has not been evenly distributed.

Ensuring that a range of perspectives inform design and policy decisions will help create a community that's more inclusive, functional, and responsive to the needs of all community members.

Equity Lens

Ensuring all population groups are adequately represented in public decision making requires extended efforts to engage populations that historically have had limited time and resources to engage in public decision-making processes. These groups include:

- Hispanic and Black residents
- Youth and adults under 35
- Renters and lower-income households
- Non-English speakers and residents with limited English proficiency
- Individuals without reliable internet access or traditional access to engagement channels

Advancing representation will require moving beyond participation alone toward outcomes that reflect the full diversity of the community. This includes:

- Ensuring engagement processes reach and reflect underrepresented populations
- Supporting equitable access to economic opportunity and small business development
- Designing public spaces and neighborhoods that reflect diverse identities and lived experiences
- Aligning investments with areas and populations identified through the City's Equity Index
- Reducing impacts of development to communities in areas identified with high displacement risk.

Who lives in this Community?

- **30%** of population identifies as people of color
- **29%** of households include children
- **15%** of households below federal poverty line
- **13.7%** Are foreign born, with strong representation from Latin America, Asia & Europe.
- **10.7%** of adults identify as LGBTQ+
- **7.3%** of households do not have access to a vehicle
- **Fastest Growing Populations -** Hispanic/Latine, Native Hawaiian & Pacific Islander communities**,** and Multiracial Residents
- **Languages Spoken** – English, Spanish, Russian, Vietnamese, Chuukese, Mandarin and American Sign Language

Social Infrastructure

Social infrastructure—the network of physical places and community institutions where people regularly interact—is one of the most powerful tools the city has to counter isolation and build connection. In Vancouver, this includes neighborhood parks and trails, libraries, community centers, schools, cultural and faith-based institutions, small businesses and cafés, arts and performance venues, and the streets, plazas, and civic spaces that knit them together. Throughout the engagement process, residents consistently described these places as the heart of community life: parks, the waterfront, community centers, and local events were repeatedly celebrated as the spaces where people build relationships, find recreation, and feel a sense of belonging. Downtown, the Waterfront, Esther Short Park, and historic



Downtown Vancouver currently has a wide range of amenities, restaurants, coffee, shops, community centers, social spaces, and urban plazas that foster opportunity for connection. As the city continues to grow, new centers identified in the growth concept (chapter 3) will need to accommodate similar levels of service.

neighborhood main streets were often characterized as the city's "living rooms" and everyday third places—sites of casual encounters, cultural activities, and shared community identity.



Murals: "Lewis and Clark" David Van Overeem, 2014; "River Recreation" Jan Strommel, 2014
Murals and other public art installations provide opportunities for representation in the built environment, and developing a shared sense of community identity. Policies in this Chapter as well as the Parks and Recreation Chapter highlight policies to help advance community representation.

Over the next 20 years, Vancouver will add an estimated 38,000 new housing units to meet projected population growth, with an emphasis on more diverse housing types in already urbanized areas. This scale of investment represents a once-in-a-generation opportunity to strengthen social infrastructure alongside new homes. As new multifamily buildings, middle-housing types, and mixed-use centers are built, the Comprehensive Plan will guide their design to help facilitate communities with a variety of activities, businesses, events, and publicly accessible gathering spaces. This includes small plazas, courtyards, and community rooms within new developments; co-located housing and services for older adults; and flexible spaces that can host childcare, cultural programming, and neighborhood-led activities. By planning housing and social spaces together, the City can help ensure that new residents are moving into connected neighborhoods rather than isolated complexes.

The City has already begun investing in this kind of community-oriented public realm. The Main Street Promise project and similar efforts are reshaping key corridors into safer, more walkable, tree-lined main streets that support small businesses and everyday gathering. Investments in parks, trails, and community centers have expanded year-round opportunities for recreation, cultural events, and youth programming. Partnership-based initiatives in areas like Fourth Plain and Fruit Valley are demonstrating how culturally specific services and neighborhood-run facilities can create hubs of activity that reflect the communities they serve. The success of the Arts Hub and momentum behind arts-focused spaces is a poignant reminder of the critical importance of art and culture in our lives. These efforts show how public investment can seed the kinds of places where residents naturally come together.

Parks, recreation facilities, and public open spaces are among the most widely used and accessible forms of social infrastructure in Vancouver. They provide consistent, low-barrier environments where residents build relationships, participate in shared activities, and access community resources. From neighborhood parks and trails to community centers, pools, and plazas, these spaces support everyday interaction across age, income, and cultural background. Expanding and equitably distributing these assets—particularly in areas with higher social isolation or fewer amenities—strengthens community resilience and reinforces the role of parks as essential civic infrastructure.



Publicly Accessible Pool at Firstenburg Community Center.

Vancouver's social infrastructure is also shaped by the presence of long-standing institutions that serve specific communities and create spaces of identity, connection, and support. The Washington School for the Deaf and the Washington State School for the Blind are two key statewide institutions located in Vancouver that serve students and families from across Washington and function as important cultural and community anchors for people with disabilities. These institutions contribute to a broader network of culturally specific spaces and services that reflect Vancouver's growing diversity. As highlighted in the City's Equity Analysis and Community Atlas, Vancouver is home to a wide range of equity priority communities—including Chuukese, Asian American and Pacific Islander (AAPI), Eastern European, Latine, Black, queer, and other culturally distinct populations—each with unique needs, traditions, and needs for community spaces. These communities are supported by faith-based organizations, small businesses, cultural centers, and community-led initiatives that serve as vital social infrastructure, fostering belonging, cultural continuity, and mutual support across the city.

Community Design and Aesthetics

Design and aesthetics shape how people understand and move through the city, influencing whether neighborhoods, business districts, and open spaces feel welcoming, walkable, and reflective of the people who live in and use them. As Vancouver grows and transitions into a more connected and compact city, the quality of its public realm—its streets, parks, buildings, and everyday gathering places—plays an increasingly important role in shaping the lived experience of residents. Community members consistently emphasized that design matters: attractive streetscapes, comfortable pedestrian environments, engaging storefronts, trees and landscaping, and public art contribute to how people feel in their neighborhoods and whether they feel a sense of connection to place.

Smaller households, remote work, long commutes, and car-dependent development patterns make it more difficult for chance encounters outside. These trends are not just a result of changing social dynamics and technological advances—they're also shaped by land use. When homes, shops, schools, and parks are spread far apart and separated by environments where it's difficult to walk or navigate without a car, it becomes harder to casually meet one another, linger in public spaces, or feel a sense of shared ownership over our neighborhoods.

Community Feedback

- Need to foster belonging, safety, and stability for all residents, including physical safety, emotional and mental safety, allowing community members to feel relaxed and respected.
- Desire for spaces, services, and information that are accessible—physically, culturally, and financially.
- Value of and desire for places, events, and organizations that reflect their individual identity, allowing them to express themselves and connect with others who share that identity.
- Appreciation for Vancouver's existing feel and community spaces.
- Including parks and trees, access to nature, events, local art, food trucks, and community hubs like libraries, faith centers, and the waterfront.
- Mixed feelings about future growth and change, with interest in retaining the things people appreciate about Vancouver today.
- Desire for more places, programs, and processes that support social ties, involvement, and lifelong learning.
- Strong interest in high-quality spaces that incorporate greenery and public art and are well-maintained and context-sensitive.

As Vancouver accommodates significant new housing over the next 20 years, carefully shaping how new development integrates into the city is critical. Experience is also shaped by whose histories, cultures, and identities are made visible in the built environment. Vancouver's engagement process underscored that many communities—particularly Indigenous, Black, Latine, immigrant, refugee, LGBTQ+, and youth communities—do not consistently see themselves reflected in public art,

architecture, or civic spaces. Residents expressed a desire for a public realm that celebrates the city's cultural diversity and acknowledges histories that have historically been excluded from dominant narratives. The Comprehensive Plan incorporates these sentiments by enacting policy to support it, primarily through Chapter 2, Equity and Inclusion, and Chapter 3, Land Use and Development.

Applying a Community Experience Lens

This chapter establishes a lens that extends beyond this section of the plan. While goals CE-1 through CE-5 focus directly on social infrastructure, inclusion, safety, innovation, and community identity, their intent is to shape how all planning decisions are made across the Comprehensive Plan. Applying a community experience lens means evaluating policies, investments, and regulations not only by what they produce physically, but by how they affect daily life—especially for residents who face barriers due to income, race, language, age, disability, gender identity, renter status, or health vulnerability.

It asks:

1. Who benefits from this decision?
2. Who may be excluded or burdened by it?
3. How will this change feel to someone moving through their neighborhood on foot, by transit, or without financial flexibility?
4. Does this action strengthen a sense of belonging, dignity, and social cohesion?

Goal: CE-1 Social Infrastructure

Vancouver community members live in vibrant, active, and engaged neighborhoods with supportive social ties, where collaboration and mutual care create a sense of belonging.

Social infrastructure refers to the places, relationships, and systems that help people feel connected, supported, and rooted in their neighborhoods and community. In Vancouver, this infrastructure takes many forms—community centers, parks, cultural and creative spaces, arts venues, privately owned event spaces, and the informal networks that emerge in everyday life. These spaces and relationships are essential to community well-being: they strengthen trust, reduce social isolation, support mental and physical health, and help neighbors mobilize to help themselves and others during emergencies or climate-related events.

As Vancouver grows and becomes more diverse, social infrastructure plays a critical role in maintaining belonging and resilience. Many residents—especially low-income households, renters, older adults, youth, people with disabilities, immigrants and refugees, and LGBTQ+ community members—experience barriers to participating in civic life or accessing culturally relevant gathering spaces. The Comprehensive Plan seeks to reduce these barriers by expanding access to free and low-cost spaces; increasing opportunities for artists, creatives, and community organizations; and inviting future users of these spaces to help shape design and programming.

The plan also encourages reactivating underutilized or unconventional spaces—such as vacant parcels or areas under bridges—to bring community, cultural, and environmental programming to areas that currently lack access. This goal also recognizes the need for public spaces that support climate resilience by offering shade, cooling, clean air, and refuge during extreme heat and smoke events, given the prevalence of these events today and their projected increases by 2045.

Events and cultural celebrations further contribute to vibrant, welcoming neighborhoods by creating opportunities for connection across cultures and generations. Together, these strategies build a city where every resident has access to the social supports they need and where collaboration, mutual care, and belonging are fundamental to everyday life.

Applying this Lens across Chapters

- The Land Use and Development chapter shifts away from isolated, low-density patterns toward a network of centers and corridors with mixed uses, services, and amenities within walking distance. This supports CE-1 by enabling "third places"—cafés, libraries, parks, childcare, and neighborhood businesses—that were historically missing in many parts of the city.
- The Housing chapter policies prioritize locating new homes near essential services, such as education, healthcare, grocery stores, childcare, and recreation opportunities. CE-1 clarifies that this is not only an efficiency strategy, but a social connection and well-being strategy that reduces isolation and strengthens neighborhood life.
- The Parks, Recreation, and Cultural Services chapter identifies parks, community centers, trails, cultural spaces, and greenways as essential spaces that contribute to physical, mental, and community health. CE-1 positions these places as core civic infrastructure that enable gathering, mutual support, and everyday interaction.
- The Transportation and Mobility chapter commits to an equitable, connected network of streets, paths, and transit that links people to essential resources and opportunities. Under CE-1, those routes are understood as social connectors that link residents to schools, parks, libraries, and commercial districts—not just corridors for throughput.
- Social infrastructure also supports broader goals in the Economic Opportunity chapter, as well as Goal LU-1: Connected and Accessible Neighborhoods. Social Infrastructure strengthens neighborhood economies by creating active, walkable places that support local businesses. Parks, plazas, and community facilities generate consistent foot traffic, support small business visibility, and contribute to the vitality of neighborhood business districts, reinforcing place-based economic development strategies.

Supporting Policy	Description	No.	Related Goals
Center Impacted Voices in the Development of Community Spaces	Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design, and programming of community spaces.	**26**	CE-1, CE-5 EI-1, EI-4, PR-4
Climate Resilient Spaces	Incorporate elements of climate resiliency into new public spaces, buildings, and infrastructure.	**29**	CL-1, CE-1, PR-1, PFS-3, LU-3

Supporting Policy	Description	No.	Related Goals
Event Programming	Continue to support and expand local gatherings, festivals, and special events that uplift community, reflect diverse histories and lived experiences, and create a sense of civic pride.	**57**	CE-1, CE-5, PR-4
Inclusive Engagement	Foster inclusive, community engagement rooted in inclusion, trust, and long-term relationship-building. Center the voices of those who are most directly impacted by outcomes of City processes.	**69**	EI-4, CE-1
Increase Access to Community Spaces	Facilitate and provide access to community spaces, with a focus on populations vulnerable to social isolation.	**75**	CE-1, EI-2, LU-1
Increase Access to Space for Artists and Creatives	Establish partnerships that increase access to shared, affordable spaces serving artists and arts and cultural organizations.	**76**	CE-1, PR-4, CE-5
Program Underutilized Spaces	Encourage the thoughtful reuse and activation of underutilized lands—such as space beneath freeway viaducts, oddly shaped parcels, utility corridors, temporarily vacant lots, and other non-developable remnants typically under 1 acre—by establishing public-private partnerships to program them to serve community, cultural, and environmental needs.	**106**	CE-1, CE-4, LU-4, PR-2
Shared Parking and Redevelopment of Existing Parking	Encourage shared parking strategies to improve land efficiency and reduce redundant parking supply. Incentivize the redevelopment of large, underutilized surface parking areas into more productive uses that support redevelopment and other community-serving needs.	**133**	LU-4, CE-1
Support Neighborhood Organizations	Support the growth and stability of neighborhood associations as key partners in establishing local pride, connection, and representation within Vancouver's distinct neighborhoods.	**149**	CE-1, CE-5, EI-4

Goal: CE-2 Inclusive and Affirming Environments

Vancouver's public spaces and facilities are inclusive and affirming across race, class, age, sex, gender identity, ability, religion, national origin, and citizenship status, creating a sense of belonging and safety.

Inclusion is the foundation of a community where everyone feels safe, welcomed, and able to fully participate in civic life. For Vancouver, this means creating public spaces, services, neighborhoods, and cultural expressions that honor residents' identities across race, class, age, sex, gender identity, sexual orientation, ability, religion, national origin, and citizenship status. It also means recognizing how past and present inequities have shaped access to opportunity and belonging—and actively working to repair harm while building a more just future.

This goal emphasizes a holistic approach to inclusion that goes beyond removing barriers. It calls for culture-building, trust-building, and the intentional design of environments where historically excluded and marginalized communities can see themselves reflected, respected, and supported. This includes ensuring that City programs and services are delivered using trauma-informed practices, so that community members—particularly those who have experienced violence, displacement, or systemic harm—can engage with public institutions safely.

A welcoming and affirming city also requires shifting from transactional interactions toward deeper, relational connections between the City and residents. This means supporting new and long-term residents alike, investing in community-led networks of care, and ensuring that people at greatest risk of exclusion are empowered to play a key role in community building and shaping how our spaces are designed. Cultural representation is another key pillar: public art, cultural installations, and the design of public spaces should reflect the full diversity of Vancouver's communities, telling stories that have historically been left out of the city's physical landscape.

To support accessibility and equitable participation, the City will expand multilingual, culturally competent services and improve communication channels so community members can meaningfully access information, programs, and decision-making processes. Creating inclusive environments also extends to the built environment and housing. Supporting culturally specific and identity-affirming housing models—whether for immigrant and refugee communities, LGBTQ+ residents, Indigenous

communities, or others—ensures that people can live in places that reflect their cultural identities, family structures, and community relationships.

Applying this Lens across Chapters

- The Equity and Inclusion chapter establishes that historic policies created disparities in access to safe transportation, amenities, and healthy environments, particularly for communities of color, low-income households, people with disabilities, and LGBTQ+ residents. CE-2 operationalizes this by shaping how places are designed, programmed, and experienced.
- Parks, Recreation, and Cultural Services policies commit to inclusive, safe public spaces that reflect the diversity of the community, remove cost barriers, and support culturally responsive programming. CE-2 reinforces that public spaces should feel welcoming across language, culture, age, and ability.
- Public Facilities and Services planning emphasizes equitable access to infrastructure, services, and community facilities. CE-2 ensures that facilities, such as libraries, community centers, and civic buildings, are designed and located in ways that foster belonging, representation, and dignity.
- Land Use and Development policies support mixed, inclusive neighborhoods with access to services and amenities while preventing displacement and protecting vulnerable residents. CE-2 extends this to the experience of belonging in those spaces, including culturally responsive design, public art, and identity-affirming places.

Supporting Policy	Description	No.	Related Goals
Culturally Responsive Design	Develop standards for public spaces and buildings that incorporate culturally specific design principles and art installations and reflect the diverse history and heritage of Vancouver communities.	**41**	CE-5, CE-2, PR-4
Culturally Specific and Identity-based Housing	Work with partners to facilitate and fund housing that reflects the cultures, identities, and needs of Vancouver's unique population groups, and for the equity priority communities identified in this plan.	**42**	H-2, CE-2, EI-1, H-4
Expand Representation in Public Art	Ensure publicly funded art projects and installations reflect and incorporate the experiences of historically excluded and underrepresented voices in the physical and cultural landscape of the city.	**58**	CE-5, CE-2, PR-4
Language Access and Culturally Responsive Services	Ensure all City services are accessible in high impact languages spoken throughout the city and delivered with cultural competency.	**82**	CE-2, EI-4,
Trauma-informed Services	Ensure City programs and policies are designed and delivered using trauma-informed care principles.	**156**	CE-2, CE-3, EI-2
Welcoming and Supportive Community	Build a community that welcomes and invites all community members to participate in civic life through inclusive practices, programs, and public spaces.	**162**	CE-2, EI-1

Goal: CE-3 Community Safety

Vancouver is a community where safety is prioritized, people look out for one another, and strong social ties ensure that all residents are well prepared to respond to challenges and disruptive events.

A safe community is one where people not only feel protected from harm, but also supported, connected, and equipped to respond when challenges arise. Safety is understood as both a physical and a social condition—rooted in well-designed public spaces, strong community relationships, accessible emergency services, and systems that help residents anticipate, withstand, and recover from disruptions. Vancouver faces increasing risks from extreme weather, flooding, wildfire smoke, seismic hazards, and large-scale social or economic disruptions. Strong social ties—neighbor-to-neighbor relationships, community organizations, and trusted local messengers—are essential components of resilience and are explicitly supported through this goal.

The built environment also plays a critical role. Safe street designs, active public spaces, good lighting, and visible community activity can reduce opportunities for crime and create environments where people feel comfortable moving through their neighborhoods. Land use and transportation patterns that make walking, biking, and transit safer contribute to both public safety and climate resilience, reinforcing the city's broader goals for health and sustainability.

Public safety and emergency services—fire, police, and emergency medical response—remain core components of a resilient Vancouver. This goal supports investment in facilities, staffing, and coordinated planning to enhance service quality, expand access, and support complete communities as Vancouver grows."

Applying this Lens across Chapters

- Transportation and Mobility policies identify safety as a primary goal and focus on correcting systems historically built for vehicle movement rather than people walking, rolling, or using transit. The Transportation and Mobility chapter prioritizes safety for people walking, rolling, biking, and taking transit, recognizing that past vehicle-oriented design produced high collision risk and inequitable mobility. CE-3 connects these policies to lived experience by framing traffic safety, lighting, visibility, and accessible crossings as community safety outcomes. Safe routes to schools, parks, and services reduce risk while supporting independence for youth, older adults, and people with disabilities.
- Housing stability is foundational to safety. The Housing chapter addresses homelessness, overcrowding, and cost burden—all conditions linked to physical, mental, and economic insecurity. CE-3 connects housing policy to community safety by recognizing that stable, affordable, and appropriate housing reduces exposure to unsafe living conditions, displacement, and crisis. Locating housing near essential services also improves access to healthcare, food, and support networks during both everyday life and emergencies.
- Public Facilities and Services planning links infrastructure investments to emergency services, climate resilience, and community needs. CE-3 reinforces that safety includes equitable access to facilities, reliable infrastructure, and trusted community spaces.
- The Climate and Environment chapter documents that extreme heat, smoke, and flooding disproportionately affect neighborhoods with lower tree canopy, older housing, and socioeconomic disparities. CE-3 situates emergency preparedness, cooling and clean air centers, and resilient infrastructure as community safety and dignity issues, not only environmental concerns.

Supporting Policy	Description	No.	Related Goals
Coordinate with Fire and Police	Coordinate with the Vancouver Fire Department and Vancouver Police Department to plan for expected growth, equitably serve the community, and facilitate emergency response.	**38**	CE-3, PFS-3
Crime Prevention through Environmental Design	Foster a safe community by encouraging street level activity and thoughtful building and infrastructure design that enhance public safety and community well-being.	**40**	CE-3, LU-2
Disaster Recovery and Emergency Response	Develop plans and resources to ensure effective emergency response and recovery efforts in the event of natural disasters, climate-related hazards, and social disruptions.	**43**	CE-3, CL-1, PFS-3
Public Safety	Support public safety through investment in emergency services, facilities, infrastructure and coordinated preparedness efforts that strengthen community resilience and response.	**109**	CE-3, PFS-3
Reduce VMT and GHG Per Capita	Implement land use patterns that reduce vehicle miles traveled, traffic congestion, and associated greenhouse gas emissions per capita, while improving safety and air quality.	**118**	CL-3, CE-3, TM-2
Trauma-informed Services	Ensure City programs and policies are designed and delivered using trauma-informed care principles.	**156**	CE-2, CE-3, EI-2

Goal: CE-4 Innovation

Vancouver community members are empowered to test and explore creative solutions, innovative methods, entrepreneurship, calculated risk-taking, and bold solutions that drive progress, address systemic inequities, and improve quality of life within neighborhoods.

Vancouver's future depends on its ability to identify and embrace new ideas and methods for addressing challenges. This goal sits within the **Community Experience** chapter to establish innovation as an overall community mindset, and way of approaching challenges, designing services, building neighborhoods, and working together as a community. It affirms that creative problem-solving belongs to everyone, not only entrepreneurs or industry leaders, and that the City has a responsibility to cultivate environments where residents feel empowered to test ideas, learn from failure, and pursue solutions shaped by lived experience.

Innovation is a powerful tool for addressing systemic inequities and improving quality of life, particularly when driven by the communities most impacted by those inequities. This goal supports inclusive, ethical approaches to technology that intentionally reduce bias and expand access—ensuring that smart tools, digital platforms, and data practices uplift rather than marginalize. It also advances experimentation across City systems, from decentralized infrastructure that reduces strain on centralized networks, to streamlined development processes that support small businesses, to creative mobility solutions that prepare Vancouver for emerging technologies while maintaining safety and equity.

This goal also recognizes that innovation happens at many scales. At the neighborhood level, pilot projects—temporary demonstrations, low-cost activations, and flexible interventions—allow residents to test ideas before the City makes long-term investments. These projects help generate community buy-in, reveal what works in practice, and create opportunities for people to directly shape public space. Similarly, the reuse of underutilized or unconventional spaces offers fertile ground for experimentation, enabling partnerships that bring cultural programming, environmental projects, and community services to areas that lack amenities or investment.

This goal also elevates the importance of workforce pathways, entrepreneurship support, and business development. By supporting training, skill-building, and opportunity across all communities—especially those historically excluded—Vancouver can support its social and economic fabric simultaneously.

Applying this Lens across Chapters

- The Economic Opportunity chapter prioritizes innovation in business and industry, development of a green economy, and reducing barriers for historically excluded groups. CE-4 frames innovation as a tool for improving quality of life and addressing inequities, not only economic growth.
- The Housing chapter calls for expanding the range of housing types, supporting non-traditional design and ownership models, and allowing emergency, transitional, supportive, and culturally specific housing. CE-4 frames this as housing system innovation—updating regulatory, financial, and design approaches so the housing market can respond to demographic change, affordability pressures, and multigenerational living patterns. It supports piloting new housing forms, shared housing models, and incremental neighborhood-scale infill as tools for both supply and social resilience.
- The Transportation and Mobility chapter moves beyond a vehicle-priority model toward multimodal access, small mobility devices, and integrated hubs. CE-4 frames this as mobility innovation—expanding travel choices, testing new technologies and service models, and reducing financial and physical barriers to movement. It supports pilot programs, adaptive street design, and flexible use of public right-of-way to respond to changing travel behavior.
- Climate policies emphasize both mitigation and adaptation, requiring new approaches to building performance, land use patterns, and infrastructure systems. CE-4 supports innovation in green infrastructure, urban forestry, stormwater systems, and energy-efficient buildings, as well as neighborhood-based cooling, shade, and resilience strategies. It recognizes that responding to climate impacts requires testing new tools and working across sectors rather than relying solely on traditional infrastructure models.

Supporting Policy	Description	No.	Related Goals
Emerging Mobility	Prepare for emerging technologies by updating City policies and operational requirements for shared mobility and emerging mobility vendors, including Autonomous Vehicles. Create data standards, data sharing agreements, and vendor requirements.	**46**	TM-2, CE-4
Ethical and Fair City Processes	Promote ethical and fair governance by embedding accountability in City processes, ensuring access for historically excluded communities, mitigating bias, and fostering ethical use of technology and digital practices.	**56**	EI-4, CE-4
Facilitate Job-creating Business Growth and Investment	Support businesses that create high-quality jobs by reducing barriers to growth, streamlining development processes, and ensuring access to necessary resources and infrastructure.	**59**	EO-2, EO-4, CE-4
Housing Innovation	Promote and remove regulatory barriers to new financing methods, homeownership models and design and construction techniques.	**67**	H-1, CE-4
Inclusive Use of Technology	Utilize an equity lens to evaluate, assess, develop, and implement use of smart technologies to reduce embedded biases and provide inclusive and accessible access.	**70**	EI-4, CE-4
Pilot Projects	Encourage the use of short-term pilot projects for park, transportation, and general infrastructure improvements before making long-term investments to foster innovation, test feasibility, and increase community buy-in.	**102**	CE-4, PR-2, TM-2, CL-1

Supporting Policy	Description	No.	Related Goals
Program Underutilized Spaces	Encourage the thoughtful reuse and activation of underutilized lands—such as space beneath freeway viaducts, oddly shaped parcels, utility corridors, temporarily vacant lots, and other non-developable remnants typically under 1 acre—by establishing public-private partnerships to program them to serve community, cultural, and environmental needs.	**106**	CE-1, CE-4, LU-4, PR-2
Support Decentralized Infrastructure Systems	Support decentralized local energy and water solutions while strengthening community adaptability to environmental, social, and economic changes.	**145**	PFS-1, CE-4, PFS-3
Vancouver as an Innovation Hub	Position Vancouver as a center for innovation, technology, and entrepreneurship through public investment and attracting entrepreneurial talent.	**159**	CE-4, EO-2
Workforce Development and Career Pathways	Expand access to career pathways, workforce training, and entrepreneurship opportunities that lead to living-wage jobs and wealth creation, with a focus on underrepresented communities.	**163**	EO-1, EI-1, CE-4

Goal: CE-5 Community Pride & Identity

In Vancouver, people are part of a distinct community that welcomes and supports diverse identities, cultures, and histories. Through engagement in cultural events, volunteering, and civic life, residents relate to a collective identity and sense of pride.

A strong community identity is essential to how people understand the community they live in, how they relate to one another, and how a city is understood regionally and even nationally. Cities with clear, authentic identities—whether rooted in culture, history, creativity, or shared values—attract and retain people who feel aligned with that character, shaping what it *means* to be part of a place. For Vancouver, cultivating a distinct sense of identity is not only about pride; it is a strategic advantage that helps draw and keep residents, businesses, and talent who see themselves reflected in the city's values and cultural landscape. Community identity helps create belonging, fosters connection across difference, and provides a shared narrative that anchors residents to one another and to the neighborhoods they call home.

In Vancouver, community pride is rooted in the stories, cultures, histories, and creative expressions that shape neighborhoods and bring residents together. This goal affirms that these cultural elements—whether reflected through public art, historic preservation, restaurants, small businesses, neighborhood business districts, or everyday traditions—are vital to a thriving community and should be elevated, protected, and made visible throughout the city's public spaces and civic life. Small businesses, in particular, play a critical role in providing culturally specific goods, services, and food that foster a sense of belonging for diverse communities, while also serving as hubs of creativity and innovation that contribute to the city's economic and cultural vitality.

Civic engagement and shared experiences further strengthen the fabric of community life. Local festivals, cultural celebrations, volunteer events, and community storytelling deepen residents' connection to one another and help build lasting traditions. Goal CE-5 encourages these opportunities, recognizing that pride emerges not only from physical surroundings but from the relationships and collective experiences that give neighborhoods their character.

Preserving Vancouver's historic and cultural resources is another key component of this goal. Protecting significant sites, buildings, landscapes, and artifacts honors the people and communities who shaped the city and ensures that future generations can see themselves in Vancouver's past, as well as its future.

A strong sense of community identity is not only central to belonging—it is a key driver of economic vitality and competitiveness. As Vancouver continues to grow, the city's ability to attract and retain businesses and workers will increasingly depend on the quality and distinctiveness of place. The Economic Conditions and Opportunities Analysis highlights that Vancouver's recent growth has been fueled in part by in-migration of higher-income and remote workers seeking communities with strong amenities, cultural vibrancy, and livability. Community input received during the plan update process further reinforces this connection, with residents identifying parks, cultural spaces, local businesses, and the waterfront as key places where identity and community life are experienced. Together, these factors demonstrate that investing in authentic, place-based identity supports small businesses, strengthens neighborhood economies, and positions Vancouver as a desirable place to live, work, and invest.

Applying this Lens across Chapters

- The Equity and Inclusion chapter documents how historic exclusion shaped present disparities in access to amenities, safe environments, and opportunity. CE-5 complements this by focusing on cultural visibility and belonging—ensuring that public spaces, civic processes, and neighborhood investments reflect the histories, cultures, and identities of communities who have been underrepresented. Pride is tied to recognition, representation, and repair.
- Housing policy supports culturally specific, multigenerational, and diverse housing forms. CE-5 connects this to identity by recognizing housing as a place where culture, family structures, and traditions are expressed. Stable, affordable housing allows residents to remain in neighborhoods over time, sustaining social networks and cultural continuity.
- The Land Use and Development chapter describes neighborhoods and centers as places that provide housing, services, amenities, and destinations. CE-5 emphasizes that these places should have distinct character and reflect local history, culture, and community narratives, rather than producing uniform development. Corridor reinvestment, mixed-use centers, and neighborhood nodes become settings for community life and shared identity.
- From a public facility and services standpoint, libraries, community centers, schools, and civic buildings are more than service points; they are civic anchors. CE-5 highlights their role as visible symbols of shared investment and places where community life unfolds—from cultural events to civic engagement. Their location, design, and programming influence whether residents see themselves reflected in public life.
- From an economic development standpoint, a strong, place-based community identity enhances Vancouver's economic competitiveness by attracting talent, supporting local businesses, and reinforcing the city's appeal as a vibrant place to live, work, and invest.

Supporting Policy	Description	No.	Related Goals
Align Place Based Investment with the Growth Concept	Align City investments, incentives, and programs to reinforce key centers identified in the growth concept as points for local economic development efforts and community investment.	**15**	CE-5, EO-4
Center Impacted Voices in the Development of Community Spaces	Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design and programming of community spaces.	**26**	CE-1, CE-5 EI-1, EI-4, PR-4
Culturally Responsive Design	Develop standards for public spaces and buildings that incorporate culturally specific design principles and art installations and reflect the diverse history and heritage of Vancouver communities.	**41**	CE-5, CE-2, PR-4
Event Programming	Continue to support and expand local gatherings, festivals, and special events that uplift community, reflect diverse histories and lived experiences, and create a sense of civic pride.	**57**	CE-1, CE-5, PR-4
Expand Representation in Public Art	Ensure publicly funded art projects and installations reflect and incorporate the experiences of historically excluded and underrepresented voices in the physical and cultural landscape of the city.	**58**	CE-5, CE-2, PR-4
Historic and Culturally Significant Resources	Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, and rehabilitation of historic and architecturally significant structures.	**66**	CE-5, CL-1, CL-2, PR-4

Supporting Policy	Description	No.	Related Goals
Increase Access to Space for Artists and Creatives	Establish partnerships that increase access to shared, affordable spaces serving artists and arts and cultural organizations.	**76**	CE-1, PR-4, CE-5
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the city's identity, economy, history, and future.	**104**	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Strengthen Neighborhood Business Districts	Ensure neighborhood business districts are safe, vibrant, and accessible hubs of economic activity through strategic public and private investment, and reflect a sense of community identity.	**141**	EO-4, CE-5
Support Locally Made Products and Art	Support and elevate Vancouver's local makers, artisans, and creative production sectors by promoting the use of locally sourced and recycled materials, strengthening small-scale manufacturing, and advancing a circular economy that contributes to community pride and place-based identity.	**147**	CE-5, EO-3
Support Neighborhood Organizations	Support the growth and stability of neighborhood associations as key partners in establishing local pride, connection, and representation within Vancouver's distinct neighborhoods.	**149**	CE-1, CE-5, EI-4

Equity and Inclusion





2

Introduction

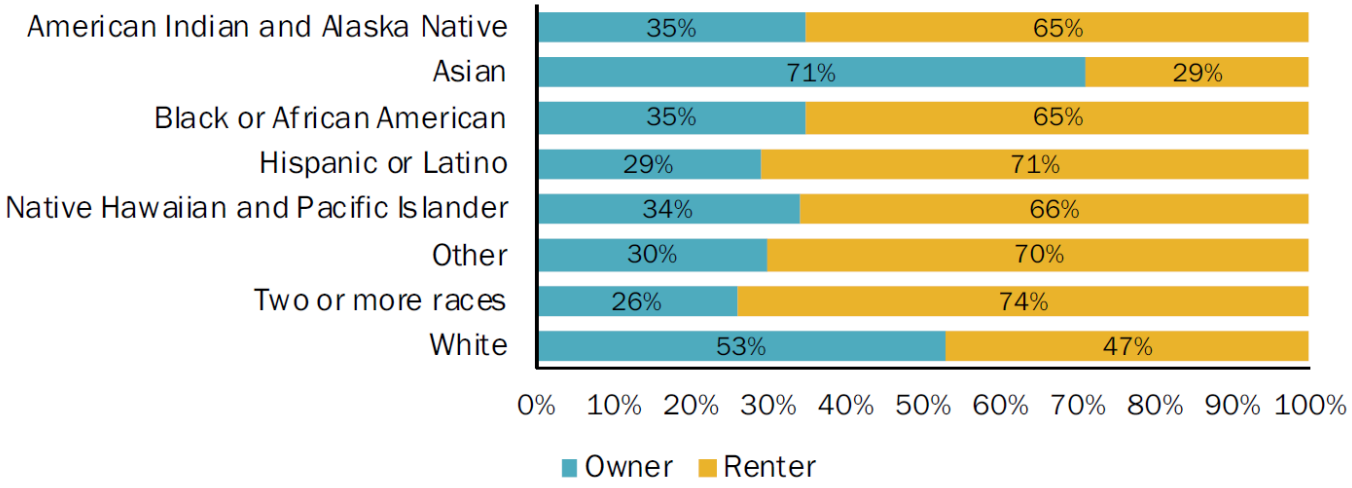
An equity approach is fundamental to shaping a future where every Vancouver community member can thrive. For too long, systemic barriers—including exclusionary housing policies, disinvestment, and unequal access to education, employment opportunities, and wealth-building opportunities—have actively harmed communities of color, people with low incomes, people with disabilities, immigrants and people with limited English proficiency, LGBTQ+ residents, and other historically underserved groups. These populations often experience overlapping barriers shaped by structural inequities. These barriers are not accidental, but the product of societal structures and systems that shaped Vancouver's growth over time. These barriers are visible in disparities in housing stability, wealth, health outcomes, educational attainment, access to safe transportation, and exposure to environmental risk. Vancouver is experiencing rapid demographic change: communities of color grew by 64 percent between 2010 and 2020, and 14.7 percent of residents speak a language other than English at home. In 2021, 51 percent of households were cost burdened[2], and neighborhoods like Bagley Downs and Meadow Homes face childhood poverty rates above 50 percent. Access to amenities is also uneven: areas in west and central Vancouver host the majority of essential services, while neighborhoods east of I-205, along Fourth Plain, and in parts of Fruit Valley have less access to parks, transit, sidewalks, safe roadway crossings, and grocery stores. It's important for the City to take a targeted and local approach to addressing inequitable outcomes in the built environment and use the tools it has available to address them. This chapter provides a lens through which to understand all the other chapters within the Comprehensive Plan, helping the City focus on equity in both the process and outcomes when implementing the plan.

Past Policies and Exclusionary Practices

Historic policy direction around growth and development in the city emphasized low-density, single-family neighborhoods and imposed minimum lot sizes and parking requirements that limited access to affordable housing choices, particularly for lower-income and non-White households. In 2023, 46 percent of land area in the city was zoned to exclusively allow the construction of a single home on one lot. The City historically has effectively limited the development of naturally occurring, small-scale density in many neighborhoods by applying land use standards that only allow single-family homes. This effectively has excluded "middle housing" forms—duplexes, triplexes, and courtyard apartments—which can provide affordable pathways to ownership and rental housing, and has contributed to the overall undersupply of housing in Vancouver and the Clark County region. People of color face a variety of structural barriers, which have impacted wealth accumulation over generations, and on average, resulted in less available wealth and purchasing power to contribute to housing. Black, Hispanic, and Native Hawaiian and Pacific Islander households are less likely to live in a single-family home and are less likely to own their homes.

[2] Our Vancouver – Housing Needs Assessment, April 2024, pg 48

Figure 3. Housing Units by Race, ACS 5 Year Estimates, 2017-2021



Additionally, housing options attainable by renters, immigrants, and people of color are often in areas near major transportation corridors, rail lines, and industrial areas, which leave these residents vulnerable to pollution, disinvestment, or redevelopment pressures without tools to ensure stability. Similarly, transportation design standards prioritized vehicle throughput over safety for people walking or biking. This contributed to inequitable safety outcomes, with higher crash rates in lower-income and BIPOC neighborhoods where residents are more likely to walk or rely on transit.[3] Economic development policies historically emphasized recruitment of large employers and external sources of investment. While these strategies created jobs, they often overlooked the needs of small, locally owned businesses, particularly those owned by entrepreneurs of color. Business ownership remains disproportionately concentrated among White residents, while Black, Latino, and immigrant entrepreneurs have been underrepresented and clustered in lower-cost, aging corridors.

Equity Analysis

The Equity Analysis (Appendix C) provides a more detailed assessment of disparities across Vancouver, identifying where communities experience disproportionate barriers to housing, health, access to services, and environmental quality. This analysis helped shape policies to address historic and ongoing inequities outlined in this chapter. It serves as a foundational tool to guide equitable decision-making and track progress toward more inclusive outcomes.

Housing, Homeownership, and Houselessness

Housing policy in Vancouver has long reflected national patterns of exclusion. Racial covenants, conditions, and restrictions (CC&Rs) once prohibited households of color from purchasing property in a select number of neighborhoods in the city. These restrictions were most prevalent in Evergreen Highlands and Riverview neighborhoods (circled as area 1 in Figure 4), the Heights (circled as area 2

[3] Local Road Safety Plan, 2022

in Figure 4), the Lincoln Neighborhood (circled as area 3 in Figure 4) and Simpson Avenue in east Fruit Valley (circled as area 4 in Figure 4). While the 1968 Fair Housing Act made these racial restrictions illegal and unenforceable, the barriers they created to homeownership limited the ability of families of color to build intergenerational wealth. This contributes to the housing and economic disparities we see today.

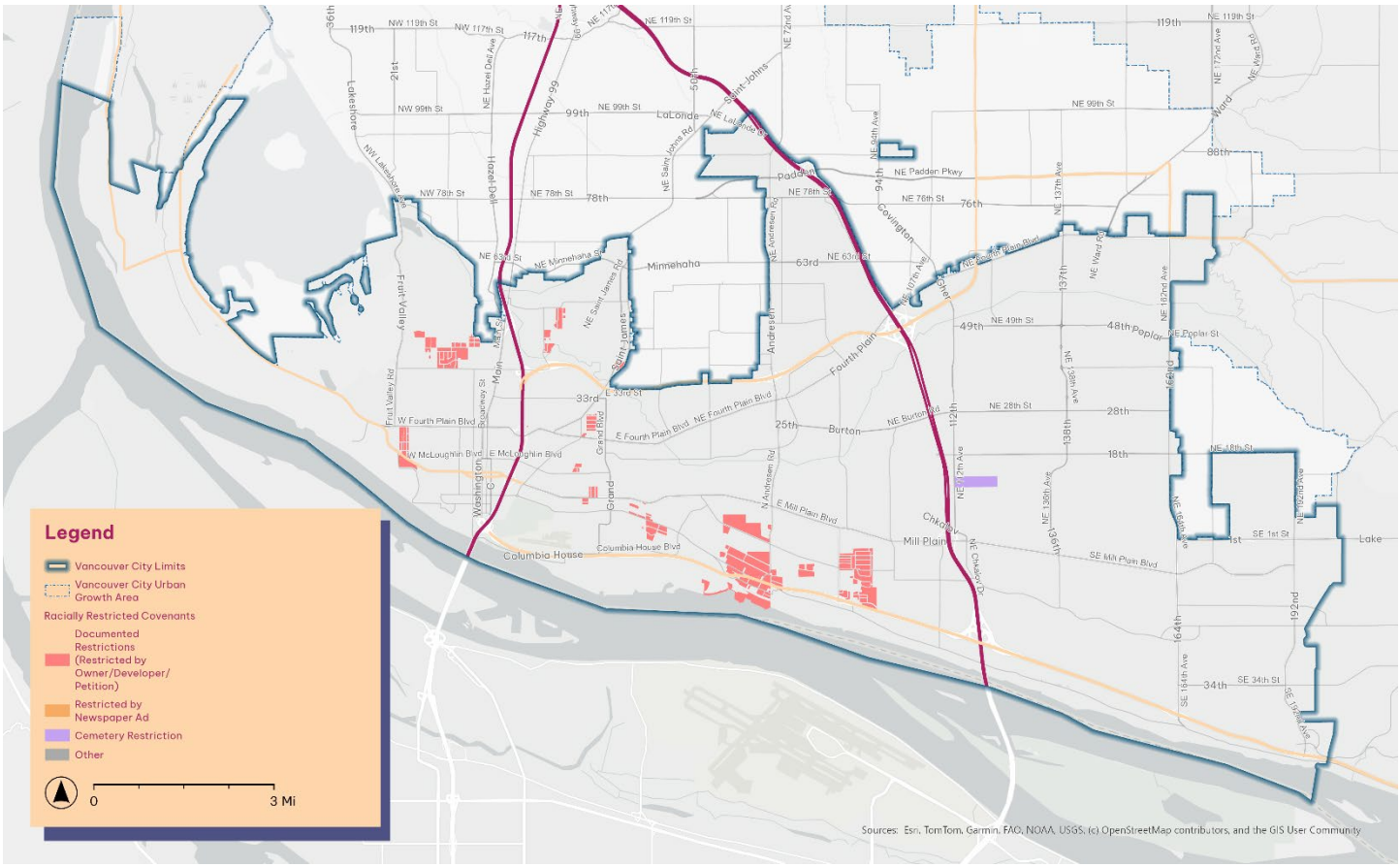


Figure 4. Neighborhoods with Racially Restrictive Covenants (University of Washington Racial Restrictive Covenants Project)

In 2021, more than half of Black households (52 percent) and nearly half of Hispanic households (45 percent) had housing costs that were 30 percent or more of their income[4]. In Vancouver, people of color, renters, and low-income households are at a greater risk of experiencing homelessness. Rising rents and redevelopment pressures in areas along Fourth Plain and in Fruit Valley compound these disparities, driving displacement risk in some of Vancouver's most vulnerable communities. These disparities are most pronounced by race and ethnicity, and are further compounded for renters, people with low incomes, people with disabilities, and households facing language or immigration barriers.

[4] Housing Needs Assessment



Vision: Equity and Inclusion

We strive to build an equitable and inclusive community that recognizes and respects intersecting identities. We do this through intentional action that seeks to acknowledge and repair injustices of the past while charting a new course, centering voices that were excluded and, in many instances, continue to be excluded from decision-making processes. We follow the guidance and expertise of those who have been directly impacted by exclusionary practices and racist and oppressive systems, to design a more equitable future for our community. We examine the intended and unintended consequences of past, current, and proposed policies with an equity lens and work towards increasing pathways to access and participation. Reparative actions, universal access, and physical and mental health are critical priorities in creating inclusive environments.

Income and Wealth Gaps

Vancouver's median household income was $76,733 in 2023, compared to $84,000 in Clark County and $84,000 statewide. Black households make $24,000 less, and Hispanic or Latino/a populations make $11,000 less than the median household income for Vancouver on average.[5]. These disparities are reflected in broader income inequality. In Vancouver in 2024, the top 10 percent of households held twice as much income than that of the bottom 45 percent of households.

[5] American Community Survey 5 Year Estimates – 2019-2023

Transportation

Transportation access and safety remain inequitable across the city. Nearly 75 percent of fatal and severe crashes occur on arterial and collector streets, disproportionately located in lower-income neighborhoods. Crashes are most common at non-intersection locations without traffic control, where pedestrians and cyclists face higher risks. These patterns mirror inequities in access to safe, reliable, and affordable transportation options, which in turn affect access to employment and services. Low-income residents, people of color, older adults, youth, and people with disabilities are more likely to rely on walking, biking, and transit; yet also face the greatest exposure to traffic collisions and unsafe street conditions (Local Road Safety Plan, 2022). Employment access is particularly limited for residents without cars, with many jobs clustered along highway corridors or in areas underserved by transit.

Health, Education, and Life Outcomes

Disparities in social determinants of health—housing, education, and income— are the product of systemic inequities and translate directly into health disparities across neighborhoods and population groups. Life expectancy can vary by more than a decade between neighborhoods. While 92 percent of adults hold a high school diploma, only 32 percent hold a bachelor's degree, with stark differences by race: fewer than 20 percent of Black and Hispanic adults have a four-year degree compared to more than 40 percent of White and Asian adults. Childhood poverty exceeds 50 percent in neighborhoods, such as Bagley Downs and Meadow Homes, shaping lifelong disparities in health, earnings, and opportunity.

Parks, Food Access, and Tree Canopy

Access to public amenities also differs across the city. Census block groups with higher proportions of people of color have less tree canopy than the city on average, reducing shade and increasing vulnerability to extreme heat. Several areas identified as equity priority communities, including Fourth Plain, Fruit Valley, and the Mountain View neighborhood, face limited access to fresh and affordable food options, further compounding health disparities. Vancouver's Climate Vulnerability Assessment shows that households identified in the City's Equity Index (which includes communities of color, low-income households, renters, people with disabilities, and others facing overlapping vulnerabilities) are more likely to live in areas exposed to extreme heat, flooding, and air pollution. These same households often lack access to resources like healthcare, insurance, or air conditioning, making adaptation to climate change more challenging. As climate hazards intensify, the inequities in resilience and recovery will grow unless addressed directly.

Recent Advancements in Equity-centered Policy

Over the past decade, the City of Vancouver has begun to reorient its policies toward equity and inclusion. These changes reflect both community advocacy and recognition that past practices reinforced disparities. The City has taken meaningful steps, and the current Comprehensive Plan update represents the most significant opportunity yet to embed equity into every aspect of growth and development. In 2020, the City Council adopted equity as one of their key priorities,

demonstrating a commitment to institutionalizing equity across planning, budgeting, and service delivery.

- **Reside Vancouver.** Adopted in 2020, Reside Vancouver is an anti-displacement strategy that outlines how the City can help stabilize vulnerable communities, such as renters, people with lower incomes, and people of color, and support them as they move towards financial self-sufficiency over time. Based on the strategy's vulnerability assessment, the recommendations are tailored to the Maplewood and Meadow Homes neighborhoods. It emphasizes tenant protections, affordable housing production, and neighborhood reinvestment and formed the foundation for policy work around equity and land use that the City is implementing through the Comprehensive Plan.
- **Fourth Plain for All and American Rescue Plan Act (ARPA) Investments.** Federal relief funds during the COVID-19 pandemic were leveraged to advance equity. Seventy-five percent of funding the City received from the American Rescue Plan Act went to funding improvements along the Fourth Plain Corridor, in housing, parks, public spaces, economic development, and community building. The City has also created the Fourth Plain Commons, which has become a model for future public-private partnerships in constructing affordable housing and support for community services. The City has invested in the Fruit Valley Action Plan, which directed resources to one of Vancouver's most underserved neighborhoods.
- **Embedding Equity in All Plans.** In 2023, equity was included as a core value of the 2023-2029 Strategic Plan and a foundational piece of the TSP update and Climate Action Framework. These policy documents guided the goals and policies in transportation, climate, and other chapters of the updated Comprehensive Plan.

These efforts highlight the investments and efforts the City has conducted recently, and outline the continued work the City needs to conduct over the lifespan of this 20-year plan.

Equity as a Lens

This Comprehensive Plan is the first in Vancouver's history to have a direct, intentional focus on equity within its policy work. The Equity Framework (Appendix B) for this plan provides the principles and process that guide this work and was developed with a core advisory group, called the Community Partners. The Community Partners group was composed of members from and/or organizations that serve equity priority communities. In addition to helping create the Equity Framework, this group worked in

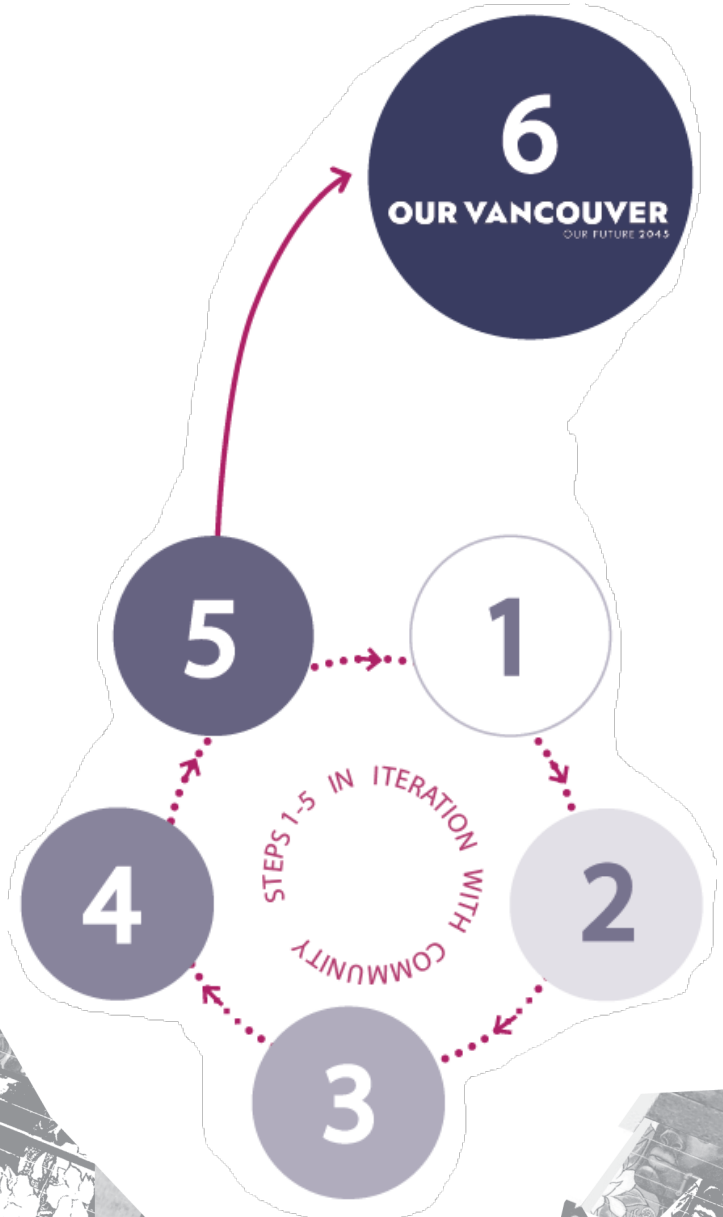
Equity Priority Communities

- BIPOC communities
- People with low incomes
- People with disabilities, including neurodivergence
- Youth and children
- LGBTQ+ individuals
- Renters
- Homeless population
- Small business owners
- Refugees
- Undocumented population
- Formerly incarcerated populations

partnership with staff to design policies, draft recommendations, and ensure that the lived experiences of historically underserved communities directly informed the plan update.

This co-creative method was central to the process. Instead of engaging communities at the end of the decision-making process, implementing the plan's Equity Framework allowed more integrated policy making at the beginning—to shape questions, surface root causes, and generate solutions together. To put these principles into practice, the Equity Framework lays out a six-step process that was applied in each chapter of the plan:

1. **Identify outcomes** that reflect equity goals.
2. **Develop metrics** to measure progress toward those outcomes.
3. **Assess baseline** gaps and root causes using data disaggregated by race, income, language, and geography.
4. **Apply an equity lens**, asking who benefits, who is burdened, who has been excluded, what unintended impacts might arise, and who is accountable.
5. **Propose** goals, policies, and strategies that address the root causes of inequity.
6. **Implement** with transparency, engaging communities in accountability and monitoring.





Intersectionality

Creating a more equitable future requires recognizing that many community members hold multiple, intersecting identities that shape how they experience opportunity, access, and belonging in the city. Factors such as race, income, age, disability, language, immigration status, gender identity, and housing stability do not operate in isolation—they compound, often intensifying barriers or shaping unique needs. For example, a low-income older adult with a disability may face different challenges navigating housing and transportation than a younger resident. Likewise, individuals experiencing overlapping structural barriers—such as those related to race, income, gender identity, disability, language access, or immigration status—may face compounded challenges in accessing housing, employment opportunities, and culturally responsive services. Planning for equity therefore requires more than addressing individual disparities—it requires an intersectional approach that considers how systems interact and how policies can either reinforce or reduce cumulative disadvantage. By centering intersectionality in decision-making, the City can better design programs, investments, and spaces that reflect the full diversity of lived experiences in Vancouver and ensure that outcomes are more equitable across all communities.



Mapping exercise conducted at Fourth Plain Commons

Guiding Community Investment and Decision Making with Data

A central component in addressing structural inequities is ensuring that resources are directed where they are needed most. Vancouver's Equity Index provides a clear, data-driven foundation for this work. By combining eight demographic indicators—including race, income, renter status, education, language access, disability, youth, and older adults—the index identifies neighborhoods with the highest levels of vulnerability and social need. This index helps decision makers understand who could benefit or be burdened by policy decisions and prioritize investments in neighborhoods where the need is greatest. The Equity Index was used in the Comprehensive Plan update to help understand baseline gaps and root causes (Step 3 of the Equity Framework) and apply an equity lens to the goals and policies in this plan. The highest concentrations of need are along Fourth Plain Boulevard and surrounding neighborhoods—including Bagley Downs, Meadow Homes, Maplewood, Kevanna Park, Image, Rose Village, and Fruit Valley—where poverty, cost burden, and environmental health disparities overlap. The index also reveals growing displacement vulnerability in neighborhoods east of I-205, such as Cascade Highlands and Mountain View, where rapid demographic change and rising housing costs signal emerging displacement risks.

Community Feedback

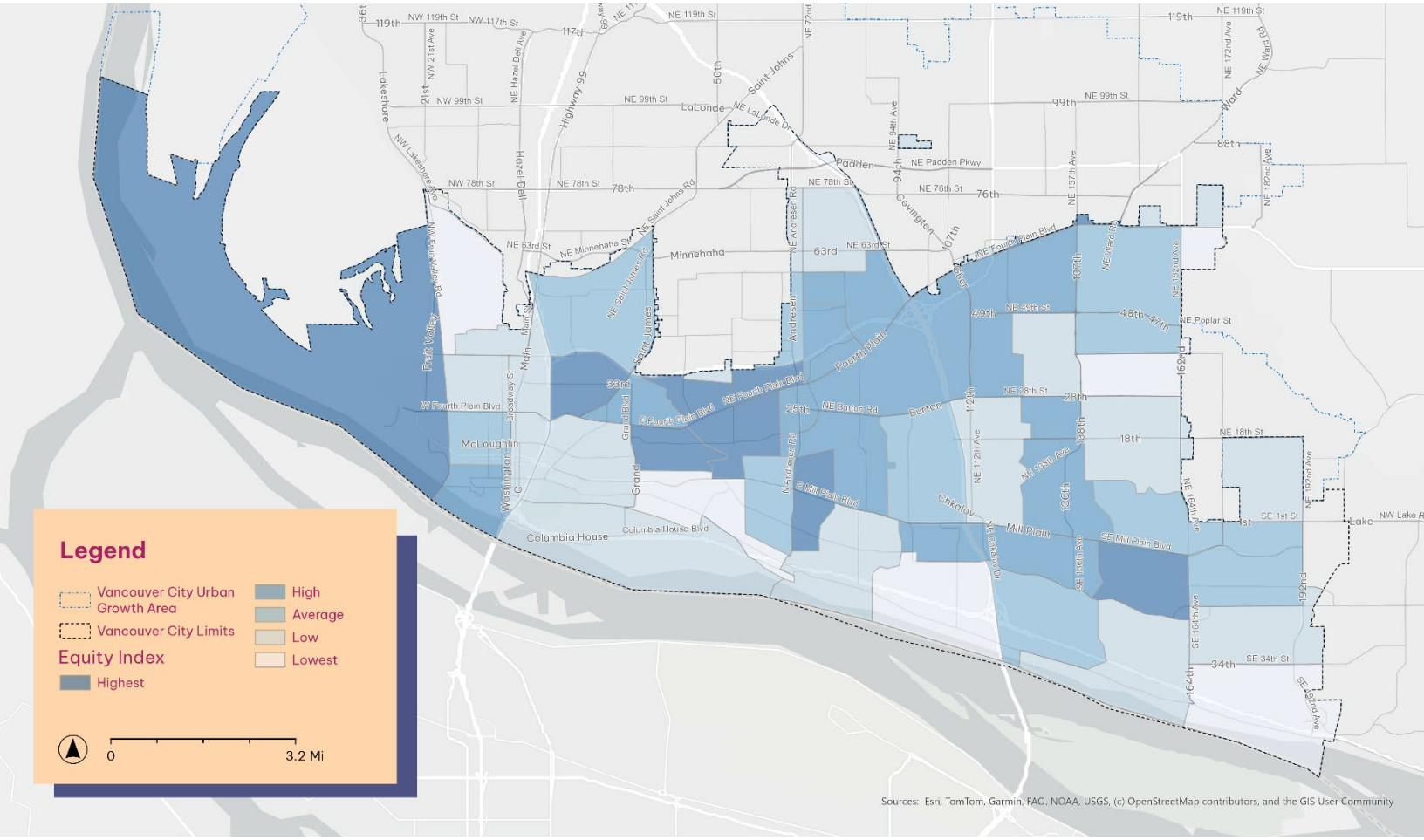
- Desire for the City to acknowledge historical injustice and systemic racism, take reparative action, and be bold and transparent in its equity commitments.
- Want accessibility and disability inclusion to be centered in planning, design, and community engagement.
- Desire for culturally specific resources, inclusive events, and community spaces that reflect diverse identities and support youth, seniors, and people with disabilities.
- Concerns about displacement and a desire to balance new development with protections for existing residents.
- People experience disparities in access to parks, healthcare, jobs, housing, transportation, and public spaces, and want tailored, culturally aware approaches that address inequalities rather than one-size-fits-all solutions.

Equity Lens: Housing Stability, Renters and Eviction Risk

Renters are a vital part of Vancouver's community, contributing to the city's economic vitality, cultural diversity, and neighborhood life. For many residents, renting provides flexibility and access to opportunity, while for communities historically excluded from homeownership, it reflects ongoing systemic barriers rather than choice. They are central to Vancouver's housing system and are disproportionately impacted by housing instability, cost burden, and displacement pressures. Approximately half of Vancouver households rent their homes, yet renters are significantly more likely than homeowners to experience financial strain, with roughly 57 percent of renters considered cost burdened. These conditions leave many households one unexpected expense away from losing their housing. Clark County has recorded the highest number of eviction filings per capita in Washington State for three consecutive years, with more than 2,200 eviction cases filed in 2025 alone. Evictions are closely linked to housing instability and homelessness, creating long-term barriers to securing future housing and disrupting employment, education, and community connections. The Health Impact Assessment further underscores how renters may face compounded risks, including limited ability to make improvements to their homes to address heat, air quality, or other environmental hazards, increasing exposure to health impacts. Addressing eviction risk, expanding tenant protections, and increasing access to affordable and supportive housing are critical to reducing homelessness and improving long-term housing stability for renters across Vancouver.

By embedding the Equity Index and Equity Framework into planning and budgeting decisions, Vancouver can ensure that investments over the next 20 years are both equitable and accountable, focusing on the communities most impacted by systemic barriers and past disinvestment. Figure 5 shows populations that have been historically underserved or disproportionately impacted by systemic inequities and are geographically concentrated.

Figure 5. City's Equity Index



Vancouver's future depends on confronting deeply rooted inequities. The census tracts that meet the threshold for high vulnerability are the neighborhoods where cost burdens, environmental health disparities, and limited access to essential services overlap, underscoring the compounding effects of historic disinvestment. This Comprehensive Plan responds by embedding equity into all chapters—using data, community partnership, and accountability to guide decisions. In doing so, Vancouver can chart a path toward a city where opportunity and belonging are not the privilege of a few, but the shared foundation for all.

Goal: EI-1 Equitable Community

All community members have equitable and inclusive access to opportunities and resources, including communities most impacted by past and present exclusionary practices.

Vancouver's ability to create a thriving and resilient future depends on whether all community members—especially those who have been most impacted by inequities—can share in its opportunities. Today, gaps in health, housing, income, and environmental quality remain stark: households of color face higher rates of cost burden and lower homeownership, life expectancy and health outcomes differ dramatically by neighborhood, and communities in central and eastern Vancouver experience greater exposure to noise, air, and heat pollution. Goal EI-1 recognizes that closing these gaps is not only about short-term programs but also about redesigning structural systems of belonging, support, and fairness across every aspect of city life.

The policies under this goal chart a long-term approach to correcting these deficiencies. By broadening access to healthcare, addressing environmental health disparities, and expanding income-based and culturally specific housing in connected and accessible neighborhoods, the City aims to stabilize at-risk households and reduce displacement by 2045. Emergency rental assistance and anti-displacement strategies are designed to help families remain in their homes so they can benefit from new public and private investments. Parallel efforts to expand educational opportunities, workforce training, and career pathways will help close persistent income and employment gaps, enabling more residents to access living-wage jobs and wealth-building opportunities.

Cultural and civic inclusion are also integral to the solution. Investments in arts, heritage, and cultural programs, coupled with community-driven design of public spaces, ensure that residents see themselves reflected in Vancouver's identity and have meaningful opportunities to shape its future. Finally, this goal focuses on using data to inform decision making, using the City's Equity Index, Equity Framework, Displacement Risk Assessment, and Climate Vulnerability Assessment, to guide community investment, prioritizing neighborhoods with the greatest need, ensuring that progress toward equity is measurable and sustained. Taken together, these strategies set Vancouver on a path to repair past harm and create equitable outcomes over the 20-year life of the Comprehensive Plan.

Supporting Policy	Description	No.	Related Goals
Access to Arts and Cultural Programs	Improve access to arts, cultural, and heritage programs by reducing barriers to participation, prioritizing underserved and historically underserved communities, and investing in related programs.	**1**	EI-1, PR-4
Access to Education and Employment	Reduce barriers to accessing education and employment opportunities, so all community members can reach their full potential.	**2**	EI-1, EO-1
Access to Non-traditional Homeownership Methods	Broaden access to homeownership for first-time owners, low-income residents, and other groups frequently priced out of through alternative ownership methods.	**3**	EI-1, H-4, H-5, H-6
Access to Services and Amenities	Expand access to essential services and amenities, particularly in underserved areas, through regulation and public investment.	**4**	PFS-1, EI-1, LU-1
Affordable Commercial Space	Utilize City-controlled real estate to provide affordable commercial leasing opportunities for small and emerging businesses.	**10**	EO-4, EI-1, EO-2
Center Impacted Voices in the Development of Community Spaces	Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design, and programming of community spaces.	**26**	CE-1, CE-5 EI-1, EI-4, PR-4

Supporting Policy	Description	No.	Related Goals
Culturally Specific and Identity-based Housing	Work with partners to facilitate and fund housing that reflects the cultures, identities, and needs of Vancouver's unique population groups, and for the equity priority communities identified in this plan.	**42**	H-2, CE-2, EI-1, H-4
Emergency Rental Assistance	Provide financial support to help at-risk households remain in their homes, preventing eviction and displacement.	**45**	H-4, EI-1, H-3
Equity and Climate Data	Incorporate the City's Equity Index, Displacement Risk Assessment tool, and Climate Vulnerability Assessment in public investment and infrastructure improvement decisions.	**54**	EI-1, PFS-1, CL-1
Health Access	Broaden access to essential healthcare and services for underserved populations and address built environment causes of health disparities.	**65**	EI-1, PR-3
Income-restricted Housing	Facilitate development of income-restricted housing, particularly in areas near transit and services.	**71**	H-2, EI-1, LU-1
Invest in Underserved Areas	Prioritize infrastructure, housing, and public service investments in underserved neighborhoods and areas of the city that have not benefitted from past investments.	**81**	PFS-1, EI-1

Supporting Policy	Description	No.	Related Goals
Mitigate Noise Pollution	Reduce and mitigate noise pollution from major stationary and mobile sources, including air travel, vehicles, freight, railroads and high-intensity industrial uses.	**89**	EI-1, CL-4
Reduce Displacement in the Face of New Growth	Implement anti-displacement strategies and actions that protect residents and businesses in advance of public investment so communities can remain in place and benefit from improvements.	**112**	H-4, EI-1
Reduce Environmental Health Disparities	Focus on areas with high environmental health disparities when mitigating the impacts of air, water, heat noise, and light pollution.	**113**	EI-1, CL-4
Support Mental Health Access	Explore partnerships to expand access to culturally inclusive mental health, behavioral health, and physical health resources.	**148**	PR-3, EI-1
Support Small Businesses	Foster inclusive economic growth through education and resources that support small business owners, entrepreneurs, and members of historically excluded and underserved communities.	**150**	EO-4, EO-1, EI-1
Welcoming and Supportive Community	Build a community that welcomes and invites all community members to participate in civic life through inclusive practices, programs, and public spaces.	**162**	CE-2, EI-1
Workforce Development and Career Pathways	Expand access to career pathways, workforce training, and entrepreneurship opportunities that lead to living-wage jobs and wealth creation, with a focus on underrepresented communities.	**163**	EO-1, EI-1, CE-4

Goal: EI-2 Universal Design & Access

Public spaces, public infrastructure, and public and private buildings are universally designed and meet best practices for accessibility and inclusion.

Designing for a wide range of ages, abilities and circumstances is essential to ensuring that all Vancouver residents can navigate, participate and thrive with safety and dignity. Today, nearly 14 percent of residents live with one or more disabilities, while neighborhoods along the Fourth Plain Corridor, east of I-205 and in Fruit Valley have higher concentrations of older adults and households without vehicles. These patterns point to inequities in mobility, access and independence and highlight the urgent need for housing, transit, parks, and community spaces designed with accessibility at the core. These conditions also underscore the need to systematically upgrade City facilities and public infrastructure to meet Americans with Disabilities Act (ADA) standards, consistent with the City's adopted ADA Transition Plan, to ensure compliance with federal law and remove long-standing barriers to access across municipal buildings, parks, rights-of-way, and services. Goal EI-2 responds by making accessibility a foundational value across public spaces, infrastructure, housing, and private development, directly supporting LU-1: Connected and Accessible Neighborhoods, which envisions communities where everyone can reach services, jobs, parks, and cultural spaces within their daily lives.

Over the next 20 years, the policies under this goal aim to reduce these disparities by embedding universal design principles in all new public facilities, incentivizing their adoption in private development, and expanding retrofits for existing homes. These measures ensure that housing options are accessible, inclusive and adaptable—supporting multigenerational households and enabling residents to age in place.

This goal also calls for stronger connections between housing and natural spaces. By siting new homes near existing and future parks, and by improving the accessibility of parks and greenways in historically underserved neighborhoods, the City will close long-standing gaps in access to the physical and mental health benefits of nature. Taken together, these strategies directly address existing deficiencies in equitable outcomes—ensuring that, by 2045, Vancouver has created inclusive environments where residents of all ages and abilities are connected, supported and able to thrive in their neighborhoods.

Supporting Policy	Description	No.	Related Goals
Accessible Mobility for All	Promote universal design standards and mobility solutions for disabled, senior, youth, and low-income residents across all modes.	**5**	EI-2, EI-3, TM-1,
Broaden Equitable Access to Natural Spaces and Parks	Increase equitable access to natural spaces and parks by investing in new and improved facilities in underserved neighborhoods and siting new accessible housing close to existing and future parks.	**23**	CL-4, PR-3, H-1, EI-2
Incorporate Universal Design Principles	Incentivize universal design principles in private development. Support accessibility retrofits for existing homes and prioritize affordable housing options tailored to multigenerational living, aging in place, and a wide range of abilities.	**74**	EI-2, PR-1, H-2
Increase Access to Community Spaces	Facilitate and provide access to community spaces, with a focus on populations vulnerable to social isolation.	**75**	CE-1, EI-2, LU-1
Resilient, Transit-supportive Infrastructure	Invest in infrastructure that supports reliable, frequent and accessible transit service as outlined in the Enhanced Transit Network, while adapting to localized climate impacts. Investments should expand mobility options, improve neighborhood access, and deliver health, economic, and social benefits.	**124**	TM-2, PFS-3, EI-2
Trauma-informed Services	Ensure City programs and policies are designed and delivered using trauma-informed care principles.	**156**	CE-2, CE-3, EI-2

Goal: EI-3 Focus on Youth and Aging Population

The built environment supports community members from childhood through later life, with families and caretakers benefitting from robust youth programs and accessible childcare, enabling children to excel and parents to actively participate in the workforce. Aging populations benefit from accessible infrastructure, inclusive urban design, accessible housing, and opportunities for social connection.

Vancouver's future depends on how well the City supports residents across the entire lifespan—from young children and families to older adults seeking to age in place. Today, more than 22 percent of Vancouver's population is under the age of 18, while nearly 16 percent are over the age of 65. The city will see significant growth in both youth and senior populations by 2045, with increasing demand for childcare, accessible housing, and transportation options that allow residents to live independently and remain connected to their communities. Without intentional planning, these demographic shifts risk deepening existing inequities in access to housing, mobility and essential services.

Policies under EI-3 aim to create a built environment that supports community members through every stage of life. Expanding access to affordable and accessible childcare facilities is critical for enabling parents and caretakers to participate in the workforce while ensuring children can thrive. At the same time, Vancouver must prepare for an aging population by supporting accessible housing options near services and reliable transit, and by encouraging downsizing opportunities that allow seniors to stay rooted in their communities with dignity and independence.

Housing policy also plays a central role. By incentivizing multigenerational housing, the City will expand living options that allow families to pool resources, provide care within households, and create culturally inclusive homes that meet the needs of Vancouver's diverse communities.

Finally, this goal emphasizes the importance of **community resources that foster multigenerational connection**. This includes safe play areas for children, accessible public facilities, and programming that brings youth and older adults together—strengthening social ties and reducing isolation.

Supporting Policy	Description	No.	Related Goals
Accessible Mobility for All	Promote universal design standards and mobility solutions for disabled, senior, youth and low-income residents across all modes.	**5**	EI-2, EI-3, TM-1,
Aging Populations	Ensure that residents have support for aging within community and downsizing through diverse housing options near accessible services and reliable transit to ensure long-term livability and independence.	**12**	EI-3, H-2
Multigenerational Households	Incentivize development of housing types suitable for multigenerational living.	**92**	EI-3, H-2
Resources for Youth and Aging Populations	Prioritize programs and infrastructure that support youth and aging populations, including safe play areas, accessible housing, robust childcare, public facilities and community programs that foster multigenerational interaction.	**125**	EI-3, PFS-1
Support Access to Childcare	Support the development of new childcare facilities in the city and eliminate regulatory barriers preventing their creation.	**143**	EI-3, EO-1

Goal: EI-4 Transparent and Inclusive Governance

Community members have trust in City government, built and sustained through equitable and inclusive community engagement, language access, equitable access to programs, technology and resources, an emphasis on building trust-based relationships with partners and community members, regular reporting of progress and outcomes, and co-creative and transparent decision-making processes.

Equity cannot be achieved without trust, accountability, and inclusion in the decisions that shape Vancouver's future. For too long, many communities—particularly immigrants and refugees, BIPOC residents, renters, people with disabilities, and low-income households—have been excluded from decision making or faced barriers to participating fully in civic life. Nearly 20 percent of Vancouver residents speak a language other than English at home, with Spanish and Russian/Slavic among the most common, yet access to multilingual services has lagged behind this need. These disparities reflect systems that have not only produced uneven outcomes but have also left impacted communities without a meaningful seat at the table.

Clear access to information and services is essential so everyone can take part in civic life. Some community members—including people with LEP and those who use American Sign Language—experience language-related barriers when trying to find information, use programs, or participate in decisions that affect them.

Language access supports each of the City's core values: livability, sustainability and resiliency, innovation, equity and inclusion, and community trust and relationships. It also helps us meet our strategic priorities: community safety, climate action, economic opportunity, and high-performing

government. Together, these values and priorities guide employees to support the diversity of our residents and actively remove barriers to effective communication.

Goal EI-4 addresses these gaps by embedding transparency, accountability and representation into City governance. Policies under this goal call for inclusive engagement processes that move beyond one time relationship approaches toward long-term, reciprocal trust-based relationships. This means centering the voices of communities most directly impacted by policy decisions, from the design of community spaces to the implementation of smart technology. By using an equity lens in technology and data systems, the City commits to reducing embedded bias, preventing harm, and ensuring that digital practices and smart city tools expand rather than limit opportunity.

Building a fair and accountable government also requires that decision-making bodies reflect the diversity of the community. This goal directs the City to strengthen representation on boards and commissions, ensuring that voices of historically excluded groups play a meaningful role in shaping land use, housing, transportation, and economic policies. This goal also emphasizes multilingual and culturally competent services, acknowledging that language access and cultural context are essential for true participation. Partnerships are also a key element of inclusive governance, through building deeper, sustained relationships with tribal communities and land stewards, integrating their knowledge, perspectives, and priorities into planning and decision making. This goal calls for embedding community benefits into private development and redevelopment projects, ensuring that growth directly delivers value to impacted neighborhoods through affordable housing, small business space or public amenities.

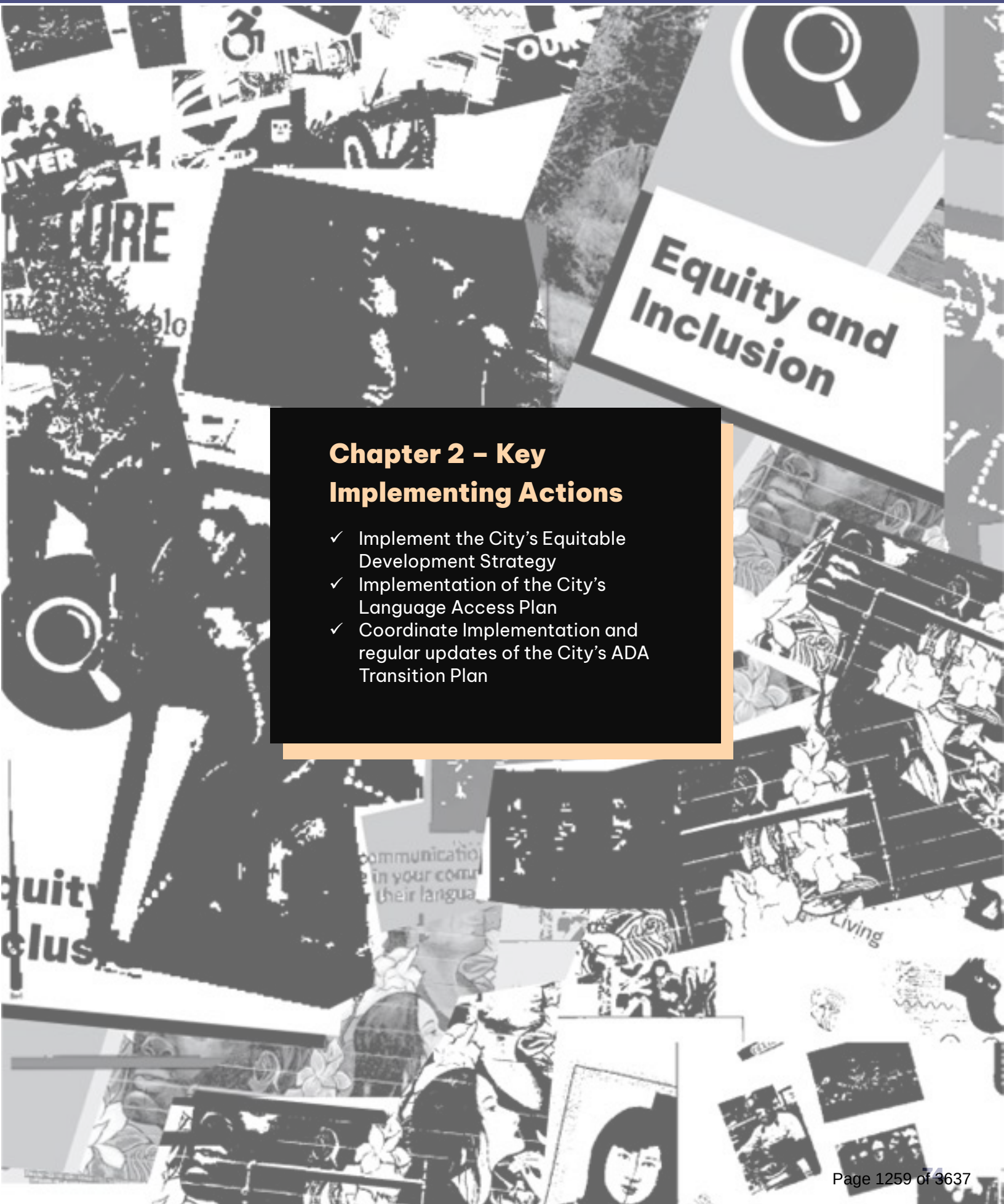
Priority Driven Budgeting

Biennial budget decisions are critical to ensuring the Comprehensive Plan is implemented successfully over time. These decisions should be based on established policy priorities, and individual budget requests are evaluated and prioritized based on the relative importance of individual programs, projects, and services for meeting those priorities. Budget narratives and reporting methodologies articulate how budget items help meet the City's mission, are consistent with its organizational values, reflect City priorities, and the cost and value they offer to community members. The impacts and outcomes of budget decisions will be regularly and transparently documented and published.

Finally, EI-4 establishes a strong framework for accountability. The City will track implementation of Comprehensive Plan policies using clear metrics, report back to the community in accessible formats, and maintain open data platforms that allow residents to monitor investments and progress. By connecting this transparency with consistent feedback loops, the City creates an ongoing process of co-governance that keeps equity commitments front and center.

Supporting Policy	Description	No.	Related Goals
Boards and Commissions	Ensure boards and commissions reflect community demographics, consist of diverse voices, and provide a meaningful role in decision-making and policy development.	**22**	EI-4
Center Impacted Voices in the Development of Community Spaces	Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design and programming of community spaces.	**26**	CE-1, CE-5 EI-1, EI-4, PR-4
Engage with Tribal Community Members	Foster meaningful partnerships with tribal communities and land stewards, integrating their knowledge, priorities and cultural perspectives into local decision-making processes.	**49**	EI-4, CL-2
Ethical and Fair City Processes	Promote ethical and fair governance by embedding accountability in City processes, ensuring access for historically excluded communities, mitigating bias, and fostering ethical use of technology and digital practices.	**56**	EI-4, CE-4
Future Updates	Continue to update the Comprehensive Plan and implementing regulations in response to the annual review process, state-mandated 5-year Implementation Progress Report, and 10-year periodic review requirement that includes updates to long-term growth forecasts and regional land capacity analysis.	**62**	EI-4
Inclusive Engagement	Foster inclusive, community engagement rooted in inclusion, trust, and long-term relationship-building. Center the voices of those who are most directly impacted by outcomes of City processes.	**69**	EI-4, CE-1
Inclusive Use of Technology	Use an equity lens to evaluate, assess, develop, and implement use of smart technologies to reduce embedded biases and provide inclusive and accessible access.	**70**	EI-4, CE-4

Supporting Policy	Description	No.	Related Goals
Incorporate Community Benefits into Development	Integrate community benefits into private developments involving discretionary land use approval or City redevelopment efforts while maintaining project feasibility.	**73**	H-4, EI-4
Language Access and Culturally Responsive Services	Ensure all City services are accessible in high-impact languages spoken throughout the city and delivered with cultural competency.	**82**	CE-2, EI-4,
Monitoring Progress	Regularly review progress towards implementation of the Vancouver Comprehensive Plan goals and policies using the metrics identified for each policy, and update regulations and policies as needed to reflect changing conditions.	**91**	EI-4
Open Government	Ensure transparent and equitable access to government data by maintaining open, user-friendly platforms that allow community members to understand, engage with, and influence public decisions and investments.	**97**	EI-4, PFS-2
Support Neighborhood Organizations	Support the growth and stability of neighborhood associations as key partners in establishing local pride, connection, and representation within Vancouver's distinct neighborhoods.	**149**	CE-1, CE-5, EI-4
Tracking Progress and Reporting Back	Build transparency and accountability with the community through regular tracking of plan implementation and consistently reporting out on progress in an accessible manner.	**154**	EI-4
Values Driven Budgeting	Ensure biennial budget decisions are guided by adopted policy priorities, with programs, projects, and services evaluated and prioritized based on their contribution to achieving those priorities. Require budget narratives and reporting to clearly demonstrate alignment with the City's mission, values, and community benefit, and to transparently document and publish outcomes and impacts.	**160**	EI-4, PFS-2



Chapter 2 – Key Implementing Actions

- ✓ Implement the City's Equitable Development Strategy
- ✓ Implementation of the City's Language Access Plan
- ✓ Coordinate Implementation and regular updates of the City's ADA Transition Plan

Land Use and Development



3

OUR VANCOUVER

Introduction

One of the biggest opportunities that the City has to influence positive change in community is through regulating the use of land. The Land Use chapter of the Comprehensive Plan serves as a framework to guide the development, preservation, and management of land resources within Vancouver. It identifies a growth concept for future development and provides a set of policies to guide and manage this growth. As the population grows and the demand for housing, jobs, services, amenities, parks and open space, and the infrastructure needed to serve this demand increases, it is essential to establish a plan for how land will be used to meet current and future needs while balancing environmental sustainability, economic vitality and quality of life.

Since World War II, areas in Central and East Vancouver have developed as low-density, suburban expansions of previously exurban and rural land. Past Comprehensive Plans adopted by the City focused and emphasized lower density development patterns aimed at preserving single-family neighborhoods, discouraging integration and mixing of different uses, and concentrating higher



Vision: Land Use and Development

Vancouver is a connected and accessible city, with neighborhoods that provide a mix housing, services and amenities, and employment centers that provide opportunities for family-wage jobs and economic mobility. We envision a city with a variety of affordable housing options; a robust economy that provides employment opportunities to all our residents; a strong network of healthcare, childcare and social service organizations; and plentiful urban and natural amenities that foster a sense of inclusion for people of all backgrounds. We recognize that change will occur incrementally, in neighborhoods and corridors across the city, and that we must accommodate this change while minimizing displacement, maintaining livability and protecting the natural environment. Our land use strategy will meet the needs of a growing city by building a resilient, thriving, connected, and inclusive urban landscape that creates harmony between the built and natural environment and fosters choice and opportunity for all.

intensity buildings in downtown and along major transportation corridors. Neighborhoods developed with fewer community gathering spaces or walkable destinations, leading to increased car dependence and fewer "third places," such as cafés, libraries, and parks, where residents naturally build connections. These patterns have contributed to uneven access to services, particularly in areas with limited childcare, grocery stores and health facilities, and for community members that rely on walking, rolling and transit to access daily needs and educational and economic opportunities.

The 2011 Comprehensive Plan looked to address some of these impacts, by making a shift toward infill and redevelopment, with policies aimed at maximizing the use of available sites and encouraging transit-oriented development. These efforts have, over time, led to the development of more compact neighborhoods and mixed-use districts, and facilitated significant investment in previously underserved and underutilized areas. Given projected population growth and associated demand for housing and jobs, as well as a lack of undeveloped land in the city, the 2025-2045 Comprehensive Plan seeks to build and expand on the 2011 Comprehensive Plan, supporting development in areas with access to public transportation and essential services, allowing for more and different housing choices in neighborhoods around the city, and facilitating job growth and investment in mixed-use centers and corridors.

Community Feedback

- Strong desire for walkable, mixed-use neighborhoods and development that integrate housing with daily needs, such as jobs, childcare, healthcare, grocery stores, parks, transit, and commercial services.
    - Youth were particularly interested in more amusement-oriented uses, such as a zoo, waterpark, or scenic viewpoints.
- Support for increasing and focusing density in corridors, centers, and underutilized areas while protecting agricultural areas and open space from development.
    - Many favor redevelopment of parking lots and commercial sites, but expressed concerns about excessive height, parking shortages, and increased density in single-family neighborhoods.
- Need for compatibility and thoughtful transitions between land uses, such as buffers between industrial and residential uses, limits on incompatible uses (e.g., car dealerships, warehouses), and careful adjacency between low- and high-density zones.
- Desire to retain and enhance neighborhood aesthetics, historic areas, and community identity.
- Concerns about how changes could impact displacement, property values, and non-conformities.
- Interest in trauma-informed, culturally-responsive planning and community-serving places,
    - Including community centers, identity-specific spaces, and development that reflects cultural needs and supports social connection.

Vancouver's updated growth concept directs future development into a network of centers, corridors and employment districts designed to create more connected, equitable and resilient neighborhoods. Instead of continuing past patterns of low-density sprawl that fueled car dependence and disparities in access to services, the new framework prioritizes compact, mixed-use growth in the Urban Core and a variety of Regional and Local Centers and Corridors. Residential neighborhoods will diversify with a broader mix of housing types and commercial services, while employment and industrial areas will be conserved for jobs and greenways, and natural areas will be protected as critical community assets.

The remaining sections of this chapter outline the plan's growth concept and the corresponding classifications, a comprehensive zoning map for the city based on the growth concept, a detailed description of the each of the zone districts that outlines the uses and scale of development associated with each, and the goals and policies designed to support implementation. The Land Capacity Analysis Methodology and Process for the Preferred Alternative (Appendix O) describes the methodology used to estimate housing and employment capacity under the Preferred Alternative, including parcel-level modeling, development prototypes, and market feasibility assumptions. This analysis ensures that the plan accommodates projected population and job growth while aligning with land use goals and infrastructure planning needs. It provides the technical basis for the future land use map and supports consistency with Growth Management Act requirements.

Countywide Planning Policies

The Land Use chapter is consistent with Clark County Countywide Planning Policies and reflects coordination with the countywide population and housing allocation process. Vancouver's growth concept, land use designations, and zoning approach supports regional goals for compact urban development, efficient service delivery, and environmental stewardship, ensuring local land use decisions align with broader county and regional planning efforts.

Growth Concept

Figure 6. Growth Concept



Urban Core

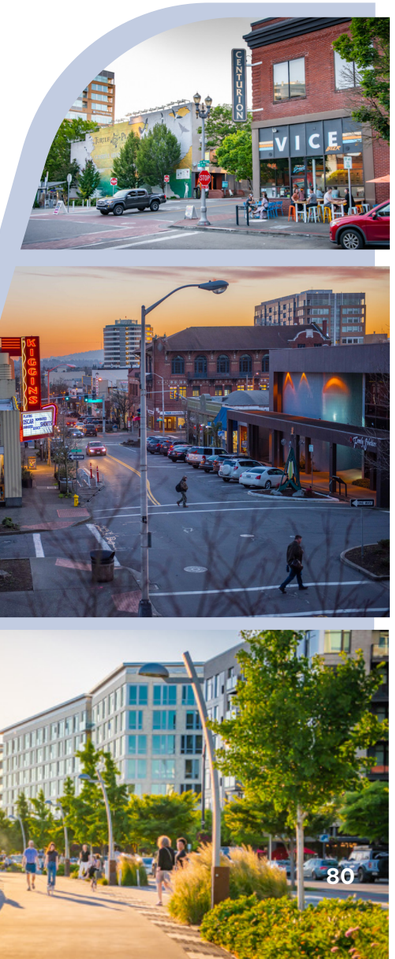
The Urban Core represents the City's highest concentration of housing, jobs, services, and amenities. It is envisioned as a vibrant, mixed-use environment that brings people together to live, work, shop, and engage in civic and cultural activities in a walkable and transit-rich setting. Growth in the Urban Core emphasizes density and vertical mixed-use development types, while also celebrating preserving historic areas.

The area is defined by a rich layering of uses—housing above active retail, large community gathering spaces such as Esther Short Park, Main Street, the Waterfront, the Convention Center, and the Farmers Market, and a strong presence of local businesses, restaurants, and entertainment. The Urban Core functions as a regional anchor that draws community members and employees from around the region and is a focal point for visitors to Vancouver. The Urban Core has a walkable, pedestrian oriented street network, and is connected to major arterials and accessible via the state highway system.

Sub-Focus Areas

1. Downtown / Esther Short
2. Waterfront
3. Downtown West
4. Uptown
5. Historic Preserve





Regional Center







Regional Centers are planned as compact, high-intensity hubs that serve as secondary anchors for housing, amenities, services and jobs outside of the Urban Core, and function as regional hubs that reduce the need to travel long distances for work or daily needs. Regional Centers are strategically located along major transportation corridors that are or will be served by frequent transit, and are intended to grow into vibrant districts that complement the Urban Core by offering accessible opportunities for living, employment, and entertainment.

These areas are envisioned with mid-rise housing, regional office space, retail districts, and community services, all supported by strong multimodal connections. Public investments in infrastructure, streetscapes, and transit access will support and catalyze private development. Regional Centers should be a focal point for locating affordable housing and essential services, ensuring that historically underserved communities benefit from new investment. Over time, these centers are expected to evolve into distinctive destinations with unique characters and identifies.

Identified Areas

- Columbia Business Center
- The Heights
- Van Mall
- Columbia Tech Center
- Vancouver Innovation Center
- Columbia Palisades/HQ

Local Center

Local Centers are intended to be hubs of housing, essential services and amenities that are accessible to most neighborhoods in the city via public transportation or small-scale mobility. They provide local and often smaller-scale destinations for shopping, dining, small businesses, and cultural life that are more accessible than regional centers or the Urban Core, and they accommodate a greater share of housing capacity than typical neighborhoods. They include jobs and may have employment centers nearby.

These areas are characterized by a mix of uses but a lower scale of development that what is seen in the urban core and regional centers ,and include mixed use buildings as well as stand alone housing, office, retail and services. Local centers are served by busy arterial streets and accessible via the City's pedestrian and bike and small mobility modal networks. Where current multimodal facilities do not meet City standards, these areas should be priorities for future improvements. Local centers should be focal points for affordable housing and business district development.



Identified Areas

- Main Street
- Central Fourth Plain
- East Fourth Plain
- West Mill Plain
- Central Andresen
- East Mill Plain
- Mill Plain and 205
- 112th corridor
- 136th/137th corridor
- 164th corridor
- 192nd corridor

Neighborhood Center



Neighborhood Centers are smaller-scale destinations that serve surrounding neighborhoods with access to everyday goods and services. They typically feature a mix of small grocery stores, cafes, childcare facilities, healthcare offices, and other neighborhood-serving businesses. They feature a variety of low and medium scale housing options, including townhomes, plexes, apartments, and small mixed-use buildings, as well as standalone commercial and office buildings.

Neighborhood Centers help more evenly distribute connected and accessible neighborhoods throughout the city so residents can walk or bike to basic services and amenities. Development will often occur incrementally through adaptive reuse of existing buildings, small infill projects, and more middle housing options. These areas are generally served by lower volume streets with existing or planned multimodal facilities, reducing reliance on cars for short trips.

Identified Areas

- Fruit Valley Residential Area
- 39th Street
- West Fourth Plain
- 33rd Street
- 29th Street- Kauffman to Norris
- Evergreen and Grand
- Grand between Mill Plain and Fourth Plain
- St. Johns/St. James couplet
- 18th Street
- Andresen South of Fourth Plain
- Burton & 86th

Campus

Campuses are large, multi-building sites that serve as anchors for education, healthcare, government, and employment. They include universities, hospitals, corporate headquarters, and research facilities and often integrate these primary uses with housing, services, amenities, athletic facilities, public open space or cultural venues. Their development is primarily guided by multi-phase master plans and public-private partnerships to improve infrastructure.

In Vancouver, these institutions include Clark College, the Department of Veteran's Affairs, Clark County Public Health, the Fort Vancouver Historic Reserve, C-TRAN, and the PeaceHealth Medical Campus, as well as priority redevelopment sites like Section 30, the Fisher's Landing Transit Center and the existing and new City Operations Center sites.

Many are looking to expand their uses to accommodate population-specific housing, and are often important providers of social services and workforce development opportunities. Their expansion will require strong partnerships between the City and other public agencies as well private developers to align growth with broader plan goals.







Identified Areas

- Clark College / VA
- Fort Vancouver
- Peacehealth Medical Campus
- Columbia Tech Center
- Section 30
- Fisher's Landing Transit Center
- Fourth Plain Ops Center
- New City Ops Center
- Clark College at CTC

Employment Centers

Employment Centers are districts primarily dedicated to providing jobs, with limited or no housing. They protect and enhance Vancouver's supply of industrial, manufacturing, office, and research space, ensuring the city maintains a strong economic base. These areas often include large parcels and flexible development sites that can support advanced manufacturing, logistics, warehousing, and associated office needs. Employment Centers are vital for sustaining living-wage jobs, diversifying the economy, and retaining businesses that may not be viable in higher-cost mixed-use environments.

Future development is expected to include modernization of industrial facilities, integration of clean and green industries, and improvements to freight and logistics infrastructure. To remain competitive, Employment Centers will often require significant investments in utilities and transportation connections. These areas must balance economic productivity with environmental stewardship, ensuring land use efficiency while aligning with the city's climate and equity goals. Concentrating job growth in well-defined areas protects employment lands and creates stable locations for long-term workforce opportunity.







Identified Areas

- Port of Vancouver
- Fruit Valley Industrial Area
- Lower Grand Employment Area
- West Minnehaha Industrial Area
- Van Mall North Industrial Area
- Andreesen + Fourth Plain
- 112th Industrial Area
- East Fourth Plain Industrial Area

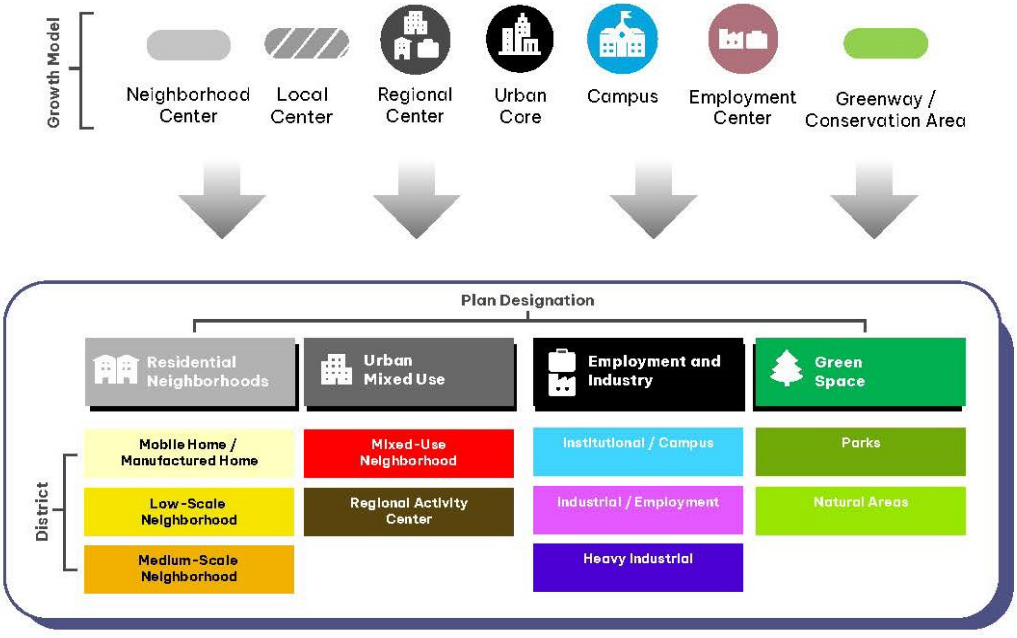
Moving from Concepts to Implementation

Areas designated as Urban Core, Regional Centers and Local Centers will likely require place-specific subarea plans (new or updated) to achieve the long-term intended outcomes. Areas like the Heights and Evergreen and Grand have recently completed subarea plans that largely align with the new Comprehensive Plan goals and policies. Other existing plans—including those for Fruit Valley, Downtown, Central Fourth Plain, 112th Corridor, and Section 30—will require updates. Several other areas—including Upper Main Street, Mill Plain east of the Heights, the St. Johns/St. James couplet, Vancouver Mall, East Fourth Plain, and the 136th/137th, 164th and 192nd corridors—do not have existing subarea plans and will likely need them in the future. Subarea plans address location-specific issues and opportunities at a greater level of detail than a citywide Comprehensive Plan can do.

While the growth concept describes how places function and relate to one another at a citywide scale and Comprehensive Plan designations group these into broad categories, zoning districts provide the specific rules and development standards that govern land use on individual sites. These rules—such as allowed building types, uses, and intensity of development—ensure the growth model is implemented consistently across the city.

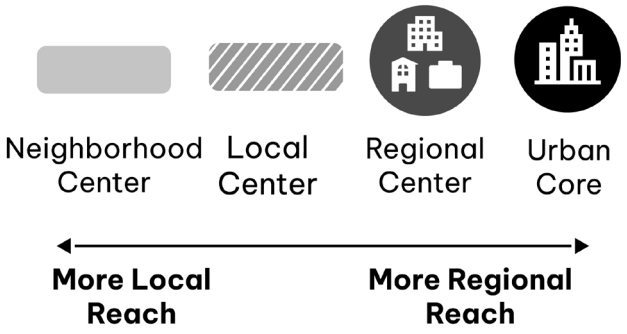
Comprehensive Plan land use designations provide the broad framework for distributing uses and scales of development around the city. The updated Comprehensive Plan groups land into four broad designations: Residential Neighborhood, Urban Mixed Use, Employment and Industry, and Green Space. Each Comprehensive Plan designation is implemented through one or more zoning districts with specific standards outlined in the City's Land Use and Development Code, which is the primary regulatory tool used to implement the growth concept and ensure new development aligns with the plan's vision.

Figure 7. Growth Concept to Plan Designations



Distribution of Services and Amenities

The growth model establishes a hierarchy for how services and amenities are distributed. The Urban Core will attract at a regional scale for employment, commercial services, and public spaces, while Neighborhood Centers focus on neighborhood-serving uses that support surrounding communities. This is ultimately reflected in the zoning map and the amount of land dedicated to each district.



Land Capacity

The following table summarizes the total acreage, estimated housing unit capacity, and employment capacity associated with each zone district, demonstrating that the City has sufficient land capacity to meet its 20-year population, housing, and job growth allocations.

Table 2. Zone District Estimated Housing Unit and Employment Capacity

Zone District	Acres	Net New Housing Units	Net New Jobs
Manufactured Home Park	205	0	N/A
Low-Scale Neighborhood	5,830	7,300	100
Medium-Scale Neighborhood	6,304	15,800	300
Mixed-Use Neighborhood	2,718	6,600	7,300
Regional Activity Center	1,569	10,600	13,500
Institutional/Campus	1,168	3,800	2,700
Industrial/Employment	2,274	N/A	16,000
Heavy Industrial	1,609	N/A	5,200
Parks	2,004	N/A	N/A
Natural Areas	1,064	N/A	N/A
Citywide Totals	**24,476***	**44,100**	**45,100**

**Citywide acreage total does not account for public right of way and other non-parcelized land.*

Land Uses Not Present

As a fully urbanized city, Vancouver does not contain designated agricultural, timber, or mineral resource lands of long-term commercial significance, nor rural land uses. Land use planning within the City is therefore focused on accommodating urban residential, mixed-use, employment, institutional, recreational, and conservation uses within the capacities stated above.

Community Experience Lens – Access to Commercial Spaces

The strategy implemented in this plan will direct a majority of new commercial uses to Mixed Use Neighborhoods and Regional Activity Centers where a broader mix of retail, dining, entertainment, and employment uses can support a wider population and higher levels of activity. These areas are intentionally located along the C-Tran Vine system, to ensure that community destinations are accessible by multiple modes and supported by existing infrastructure. By aligning these more intensive uses with transit, the City is leveraging high capacity transit to connect residents to community events, services, and commercial activity—especially during periods of peak demand—reducing carbon emissions, reducing strains on the transportation network, and supporting a more efficient system. From a community experience perspective, this approach considers the day-to-day needs of a wide range of users, including youth, older adults, people with disabilities, and households with limited access to a vehicle. It makes it easier to access destinations safely and conveniently, without reliance on driving.

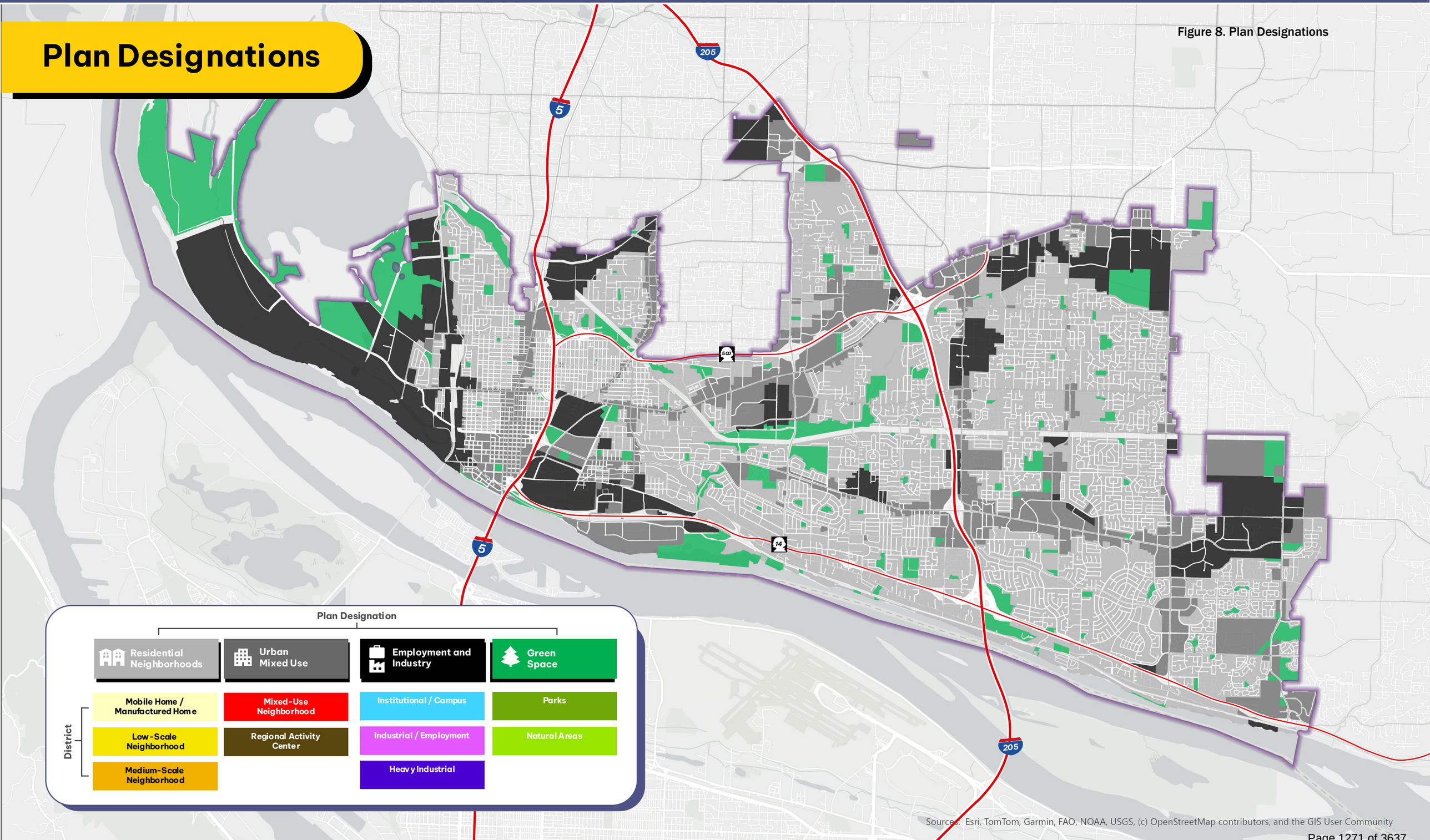
In addition to focusing higher-intensity commercial activity in centers and corridors, Vancouver's land use framework allows for small-scale, neighborhood-serving commercial uses to be thoughtfully integrated into low-scale and medium-scale residential neighborhoods to support connected and accessible neighborhoods. These uses—such as a neighborhood café, small corner market, childcare center, or personal services—are limited in size, scale, and operating characteristics to ensure they are compatible with adjacent homes and contribute to daily needs within a short walk or bike trip. By differentiating these contexts, the City can expand access to everyday services within neighborhoods while directing more intensive uses to areas with the infrastructure and transit capacity to support them.

Groundwater Resources

Protection of groundwater resources used for public water supplies is addressed primarily through critical areas regulations and the Shoreline Master Program that limit incompatible activities and guide development practices in sensitive areas. The City coordinates land use decisions with adopted water system plans, watershed planning efforts, and applicable state and local regulations to protect aquifer recharge areas and maintain long-term water supply reliability while accommodating planned growth. More detail can be found within the Public Facilities Chapter of this plan.

Plan Designations

Figure 8. Plan Designations



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

Figure 9. Zone Districts

Zone Districts

Legend

- Interstate
- State Route
- Primary Arterial
- Arterial
- Minor Collector
- Forest Collector
- Private or Other
- Major Railway
- Streams
- Waterbodies
- Vancouver UGA
- City Boundary

Plan Designation

Residential Neighborhoods	Urban Mixed Use	Employment and Industry	Green Space
Mobile Home / Manufactured Home	Mixed-Use Neighborhood	Institutional / Campus	Parks
Low-Scale Neighborhood	Regional Activity Center	Industrial / Employment	Natural Areas
Medium-Scale Neighborhood		Heavy Industrial	

District

*Figure 9, provides high level informal mapping of zoning designations applied to all properties in the City of Vancouver. A formal, more detailed zoning map version of figure 9 suitable for review of individual properties is adopted as part of the Vancouver Municipal Code Title 20 Development Code.

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

Residential Neighborhoods

Residential neighborhoods make up a majority of the developed land within City limits. They form the everyday places where people live, connect with neighbors, and access schools, parks, and local services, providing a foundation for many neighborhoods in Vancouver.

Mobile Home / Manufactured Home

Applied to existing manufactured home parks to retain long-term affordability and prevent displacement of existing residents; no other uses allowed unless ongoing use as manufactured home parks demonstrably unfeasible. Maximum height of 35 feet.





Low-Scale Neighborhood

Allows a minimum of 4-6 units of housing per parcel, and building heights up to 45 feet with a maximum of 3 floors above grade. Allows a limited range of neighborhood commercial.






Medium-Scale Neighborhood

Allows a broad range of single, middle, and multifamily housing types, with a maximum building height of 75 feet. Allows a slightly increased range of neighborhood commercial uses compared to the low scale neighborhood.






Urban Mixed Use

Urban mixed-use areas combine housing, commercial spaces, community oriented spaces, office, employment, and culture into compact, walkable districts. These areas concentrate activity in centers and corridors, supporting vibrant daily life and efficient use of land and infrastructure.

Mixed-Use Neighborhood

Allows a broad range of housing, commercial, and civic/institutional use types, with a maximum building height of 110 feet.







Regional Activity Center

Allows for a range of commercial, employment, civic and entertainment uses and amenities; facilitates dense housing and mixed-use buildings and has no maximum building heights. Intended to provide activated public spaces that draw people from around the community.







Employment and Industry

Employment and industry areas conserve land for jobs that drive the regional economy and provide pathways to family-wage employment. They encompass campuses, industrial districts, and specialized sites where production, logistics, research, and office activity are clustered.

Institutional / Campus

Includes lands that support academic, civic and medical buildings; a broad range of commercial uses; dense housing types, large campus employment and phased master-planned developments.






Industrial / Employment

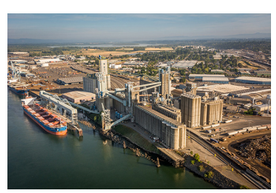
Includes lands with large-scale, single-tenant industrial, warehouse and flex space buildings, and smaller, multi-tenant industrial buildings. No maximum building heights and no new residential uses allowed.






Heavy Industrial

Includes lands that are currently zoned for heavy industrial uses, such as manufacturing and production. No new housing allowed.






Green Space

Green spaces serve ecological, recreational, and cultural functions for the community. These areas provide access to nature and recreation while protecting natural environments systems that sustain the community over time.

Parks

Lands currently zoned as public community and neighborhood parks. They provide neighborhoods with accessible, inclusive spaces that foster health, community identity, and cultural life.




Natural Areas

Includes lands currently zoned for greenways and natural areas. They strengthen biodiversity and natural systems, while connecting people to nature while protecting resources for future generations.




Goal: LU-1 Connected and Accessible Neighborhoods

Vancouver neighborhoods are places where community members can walk, bike or roll to a diverse mix of community and open spaces, services, retail, fresh food, healthcare, and educational opportunities and amenities within 15 minutes or less.

Connected and accessible neighborhoods are an overarching goal of the 2025-2045 Comprehensive Plan and associated growth concept. This concept envisions every neighborhood as a place where residents can walk, bike or roll within 15 minutes—or roughly a quarter mile—to reach daily needs, such as grocery stores, schools, childcare, health care, parks, community spaces, and local businesses. The benefits of this type of development pattern are numerous, including decreasing the time people spend in transit and the costs and climate impacts of transportation, reducing disparities in access to essential services, facilitating more efficient use of land, and providing options for healthier lifestyles and more opportunities for neighbors to gather and engage with each other. Currently, Vancouver has gaps in this accessibility: only 47,000 residents live within a quarter mile of frequent transit, and most transportation routes lack safe and comfortable walking and rolling facilities. Access to parks, healthy food options and childcare centers are unevenly distributed; neighborhoods, such as Fruit Valley, Rose Village, and parts of Fourth Plain Village, have less than 20 percent of the park acreage needed to meet City standards and higher proportions of households with limited access to grocery stores.

Addressing these limitations is essential for equity, climate resilience and public health, as well as creating urban spaces that foster a sense of community and inclusion. The different types of centers and corridors included in the growth framework (Figure 6) and guided by the new land use map (Figure 9) and zoning code are intended to facilitate an evolution to more self-sustaining connected and accessible neighborhoods. In the past, a significant amount of the city's growth occurred in areas with low food and park access and substandard transportation facilities—future development that efficiently uses land, increases mixing of uses and invests in infrastructure improvements helps to close these gaps.

Figure 10. Connected and Accessible Neighborhoods Analysis

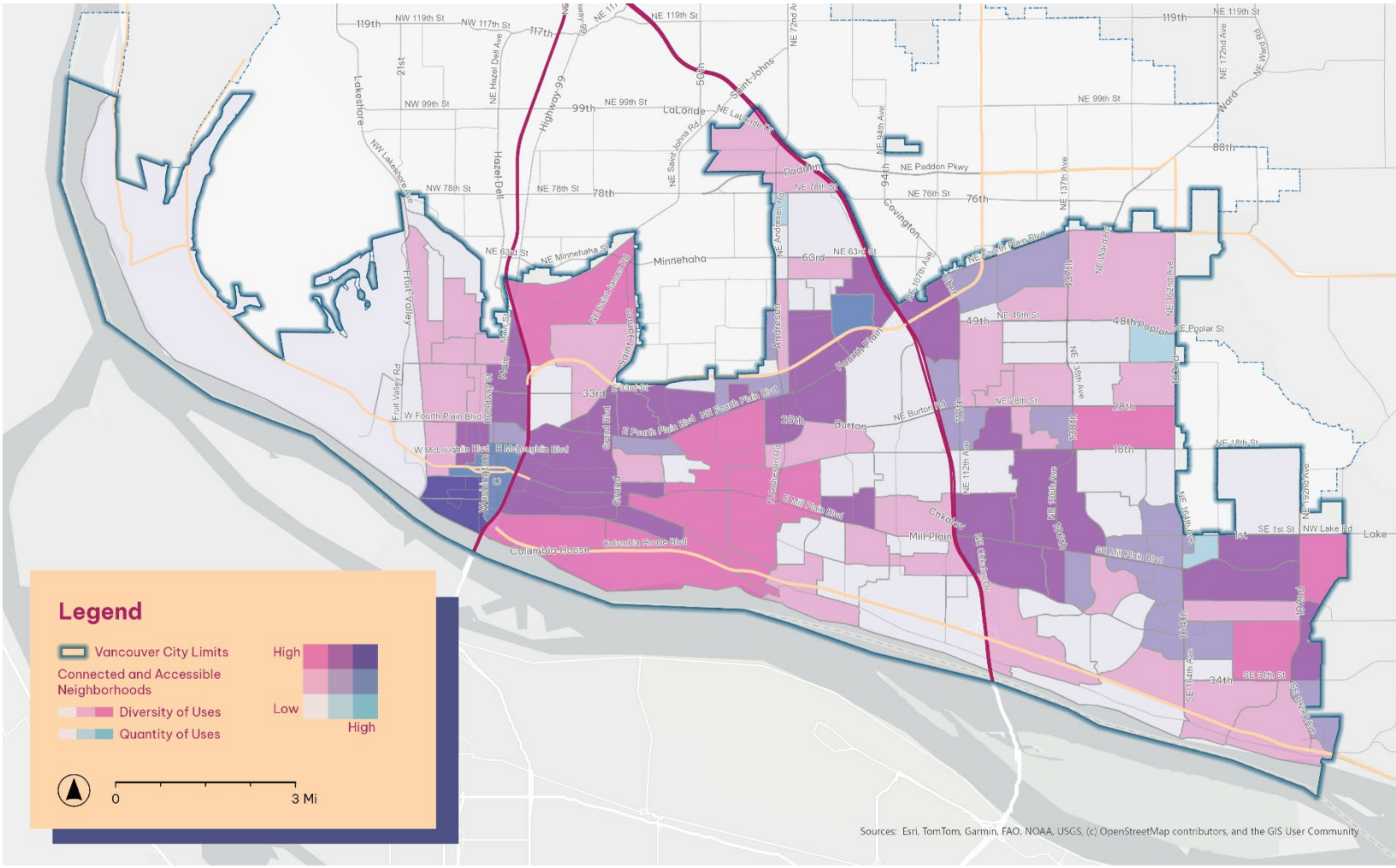


Figure 10 compares the quantity (density of uses) with the diversity of uses (number of unique business types) within a census block group. Areas with low scores (gray color) must travel farther distances to access both essential and supportive services.

The figure above is an index for connected and accessible neighborhoods that illustrate the uneven distribution of the number and diversity of services around the city. Areas with high scores (in purple) are near downtown and in established corridors—combine proximity to essential uses like grocery stores, urgent care, schools, parks, childcare, and transit with a diversity of supportive uses like cafes, community centers, and retail. Unequal access to services reinforces patterns of inequity, as these same communities often have lower incomes, higher housing cost burdens, and disproportionate climate risks, such as extreme heat and poor air quality.

Together with the growth concept, new land use map and updated zoning code, the policies in this chapter will help ensure that future growth and investment builds more neighborhoods that are equitable, multimodal and resilient. They focus on strengthening neighborhood business districts into vibrant hubs, encouraging infill and mixed-use development, and designing buildings and streetscapes at a human scale that invite walking, biking and rolling. By linking resources and housing to existing and future transit and expanding access to essential services like food, healthcare and

childcare, the City can begin to reverse inequities in the built environment and past patterns of disconnected growth, making it possible for all residents to live in neighborhoods where daily needs are close at hand and safely reachable without a car.

Supporting Policy	Description	No.	Related Goals
Access to Services and Amenities	Expand access to essential services and amenities, particularly in underserved areas, through regulation and public investment.	**4**	PFS-1, EI-1, LU-1
Campuses	Support the growth and evolution of major institutional campuses as integrated community anchors that expand access to education, healthcare and employment while maintaining strong physical, functional and social connections to surrounding neighborhoods.	**25**	LU-1
City-led Redevelopment	Invest in current and future City-led redevelopment efforts through property acquisition, community engagement, master planning, parks and infrastructure funding, and investment in affordable housing. Priority areas for City-led redevelopment include existing projects at Waterfront Gateway, the Heights, and Fourth Plain Ops Center; future projects at Library Square; and historically compatible investments at City-owned properties inside the Historic Reserve.	**27**	LU-1, EO-4
City-supported Redevelopment	Participate in future public-private partnerships to promote redevelopment on privately owned land in key areas around the city—including Downtown, Uptown Village, West Downtown, Van Mall, Columbia Business Center, Evergreen and Grand, Mill Plain Corridor, 136th near Firstenburg, and Clark College, as well as other strategic locations around the city.	**28**	LU-1, EO-4
Community Food Enterprises	Explore opportunities for community-owned and cooperative grocery store models to strengthen neighborhood food access where the private market fails to meet demand.	**31**	PR-3, LU-1

Supporting Policy	Description	No.	Related Goals
Employment Centers	Direct new employment growth into Employment Centers with close proximity to housing, commercial activities, public services, employment, and amenities.	**47**	LU-1, EO-2
Equitable Transit Oriented Development	Tailor regulations, incentives and investments to facilitate development near current and future transit stations and make this development accessible to transit-reliant and historically excluded and underserved communities.	**52**	LU-1, LU-2, TM-2
Income-restricted Housing	Facilitate development of income-restricted housing, particularly in areas near transit and services.	**71**	H-2, EI-1, LU-1
Increase Access to Community Spaces	Facilitate and provide access to community spaces, with a focus on populations vulnerable to social isolation.	**75**	CE-1, EI-2, LU-1
Increase Food Access	Incentivize and remove regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods.	**78**	PR-3, LU-1
Local Centers	Focus growth and investment in Local Centers to create compact, mixed-use districts along key corridors and intersections that provide daily goods, services, and jobs, in a manner that complements uses in Regional Centers and Urban Core.	**84**	LU-1
Neighborhood Centers	Develop Neighborhood Centers as accessible, neighborhood-serving districts that bring daily goods, services, and gathering spaces closer to where people live, supported by a mix of low- to medium-scale housing.	**95**	LU-1
Pedestrian-oriented Design	Ensure ground floor building facades, public spaces and streets are designed at a human scale and provide comfort, accessibility and visual interest for pedestrians.	**99**	LU-1, TM-1

Supporting Policy	Description	No.	Related Goals
Preserve Existing Affordable Housing	Preserve the existing stock of affordable housing and discourage conversion of income-based housing to more expensive market rate housing when affordability restrictions end.	**105**	H-3, H-4, LU-1
Regional Centers	Develop Regional Centers as compact, high-intensity mixed-use hubs that provide a balance of housing, jobs and services that complement the Urban Core, that are connected through the high-capacity transit network.	**120**	LU-1
Resources Near Transit	Locate community resources near current and future transit routes to ensure access for those most reliant on public transit.	**126**	LU-1, TM-2
Subarea Plans	Develop subarea plans for centers identified in the Growth Concept and areas called out in the Equitable Development Strategy to facilitate the development of integrated residential, commercial, employment, and community uses, including in the following areas: Central Mill Plain (the Heights to PeaceHealth), 136th/137th Corridor, Vancouver Mall, St. Johns/St. James couplet, Fourth Plain Corridor, Downtown, Upper Main Street and Walnut Grove, 164th Corridor, and 192nd Corridor.	**142**	LU-1, EO-4
Underdeveloped Lots and Brownfields	Prioritize, facilitate and incentivize development on infill and underutilized lots and clean up brownfield sites.	**157**	LU- 3, LU-4, LU-1, PFS-1, CL-4
Urban Core	Focus the city's highest intensity of future growth in the Urban Core to reinforce it as the region's primary destination for services, amenities, nightlife, and employment.	**158**	LU-1

Goal: LU-2 Preserve and Invest in Employment Land

Vancouver preserves and invests in employment land to sustain a strong economic base, provide access to middle- and high-wage jobs, and support community stability and long-term opportunity.

Preserving and investing in employment land is critical to Vancouver's long-term economic health, community stability, and ability to provide access to quality jobs. Industrial areas and designated Employment Centers support businesses that generate middle- and high-wage employment, contribute to the city's tax base, and provide opportunities across a range of industries and skill levels. Maintaining sufficient and well-located employment land ensures that Vancouver can continue to accommodate job growth while supporting a balanced and resilient urban structure.

As the city grows, employment land faces increasing pressure from competing development demands. Without clear policies to preserve these areas, industrial and job-producing lands can be incrementally lost to incompatible or higher-value uses, reducing the city's long-term capacity to support employment. Protecting employment land safeguards space for businesses that require specialized infrastructure, freight access, or larger sites and helps ensure these uses can remain and reinvest in Vancouver over time.

Supporting Policy	Description	No.	Related Goals
Adaptive Reuse	Support efforts to retrofit or repurpose underutilized buildings, structures and infrastructure for the development of new housing and commercial spaces.	**9**	LU-2, CL-3
Build a Resilient Economy	Encourage business growth, retention and expansion, with an emphasis on family-wage jobs and foster resilience within Vancouver's economy.	**24**	LU-2 CL-1, EO-3
Conserve Lands Providing Employment	Conserve and invest in industrial lands and other areas that provide employment opportunities and family-wage jobs.	**36**	LU-2, EO-2
Crime Prevention through Environmental Design	Foster a safe community by encouraging street level activity and thoughtful building and infrastructure design that enhance public safety and community well-being.	**40**	CE-3, LU-2
Enhance Port Access and Multimodal Freight Solutions	Improve infrastructure and connectivity to and from the Port of Vancouver to streamline freight operations.	**50**	LU-2, TM-3, EO-2
Equitable Transit-oriented Development	Tailor regulations, incentives and investments to facilitate development near current and future transit stations and make this development accessible to transit-reliant and historically excluded and underserved communities.	**52**	LU-1, LU-2, TM-2
Optimize Freight Corridors	Designate and enhance freight corridors to facilitate efficient movement of goods and reduce congestion.	**98**	LU-2, TM-3, EO-2

Goal: LU-3 Reduced Carbon in the Built Environment

Vancouver has successfully decreased local carbon emissions associated with Vancouver's built environment through investments in energy-efficient buildings, compact urban design, access to frequent transit, and infrastructure that supports active modes of travel.

The built environment is one of the most significant contributors to community-wide greenhouse gas emissions, accounting for both the direct energy used to heat, cool, and power buildings and the indirect emissions from how land use patterns shape transportation choices. On-road transportation (37%) and buildings and energy use (37%) together account for nearly three-quarters of community-wide emissions in 2023. While total community emissions have fallen 27% since 2007, primarily due to a cleaner electricity grid and temporary shifts in travel behavior during the pandemic, natural gas use in buildings has risen and transportation remains the largest single source of local emissions. This underscores the central role that land use plays in determining Vancouver's climate future. Dispersed, auto-dependent growth patterns lock in high vehicle miles traveled, energy-intensive buildings, higher infrastructure demands, and increased heat island effects. Conversely, compact development supported by frequent transit, safe walking and rolling networks, and energy-efficient buildings provides one of the most effective strategies to reduce emissions while creating healthier and more livable neighborhoods. Vancouver's new growth concept and land use map respond to these dynamics by aligning growth management with the City's Climate Action Framework, ensuring that how and where the community grows actively advances larger climate goals.

Reducing emissions in the built environment requires both retrofitting existing systems and reimagining new development. Energy-efficient building design, adaptive reuse of older structures, and the use of low-carbon and locally sourced materials help limit emissions from construction and operations. At the same time, policies supporting low-carbon fuels and electric vehicle adoption transition the city's transportation system toward cleaner options. Just as importantly, expanding safe, connected networks for walking, biking, rolling, and transit provides residents with practical,

low-carbon alternatives to driving, reducing vehicle miles traveled while improving health and mobility. The Climate Vulnerability Assessment underscores that the same neighborhoods most burdened by heat and air quality impacts are often those with the fewest mobility options, making it critical that these strategies prioritize equity.

The policies under this goal work together to create a comprehensive pathway for reducing carbon emissions tied to land use. Investments in building energy efficiency, adaptive reuse, and low-carbon construction materials lower emissions from the building sector. Support for alternative fuels and electric vehicles, paired with active transportation and multimodal connectivity, reduces transportation emissions. Compact development and connected streets reduce infrastructure demands and enable sustainable travel. Collectively, these approaches position Vancouver to reduce its carbon footprint while creating healthier, more livable neighborhoods. This shift will help the City meet its climate targets, protect public health, and ensure that future growth supports both environmental sustainability and community well-being.

Supporting Policy	Description	No.	Related Goals
Acquire Land for Public Parks	Acquire and reserve land for the development of parks for public use and recreation in areas experiencing growth, prioritizing underserved neighborhoods and areas currently not meeting parks service standards.	**7**	LU-3, PR-2
Climate Resilient Spaces	Incorporate elements of climate resiliency into new public spaces, buildings, and infrastructure.	**29**	CL-1, CE-1, PR-1, PFS-3, LU-3
Strategic Reuse of Excess Right-of-Way	Analyze suitability of excess and unneeded ROW for adding tree canopy, native planting, nature spaces, and stormwater management systems.	**137**	CL-1, CL-2, LU-3, CL-4, PR-2
Street Connectivity	Adopt connectivity standards to improve pedestrian and small mobility safety and accessibility. Apply standards to development, capital, and planning projects including maximum block length, unconnected streets, cul-de-sac connections, linkages between land uses, and multiple access points.	**139**	TM-1, TM-2, TM-4, LU-3
Support Local Business Transition to the Green Economy	Support local businesses in adapting to the localized impacts of climate change, and reduce their overall carbon impact.	**146**	EO-3, LU-3

Goal: LU-4 Efficient Use of Land

Development in Vancouver uses finite land and material resources practically and efficiently, and occurs primarily in previously developed areas with existing infrastructure, minimizing environmental impact, contributing to a compact urban form, and improving efficiency of service provisions.

Vancouver's land supply is finite, and how it is used will shape the city's livability, affordability and sustainability for decades to come. Efficient land use means concentrating growth in areas already served by infrastructure and utilities, reducing the need for costly system expansions while minimizing environmental impacts. By focusing on infill, redevelopment, and compact urban form, the City can support affordable housing, expand access to economic opportunities, reduce GHG emissions, and protect open space and sensitive lands outside of the Vancouver Urban Growth Area (VUGA). Directing growth in and up is critical to meeting the City's climate, equity and housing priorities.

Maximizing density in appropriate areas makes development more feasible by leveraging existing infrastructure and spreading the cost of new or upgraded infrastructure across more housing units and commercial and industrial space. Compact form also enhances transit viability by concentrating demand along corridors and around stations, creating the ridership base needed for frequent, reliable service. Site design and parking management are equally important: shared parking, on-street parking strategies, and right-sized parking requirements reduce the need to dedicate large swaths of land to vehicle storage. This lowers development costs, reduces heat islands, and also opens up space for creative land uses—plazas, pocket parks, and cultural spaces—that enhance the uniqueness and character of Vancouver's neighborhoods.

The policies in this plan mobilize these ideas by encouraging integrated employment hubs close to housing and services, facilitating infill and redevelopment, and advancing strategies for shared and managed parking. Regional coordination ensures that growth is managed consistently across Clark County, with annexation and land supply decisions supporting efficient service delivery. The plan also calls for regular reassessment to ensure land use aligns with the City's ability to provide necessary facilities and services. Taken together, these approaches recognize that efficiency is not

about uniformity but about making the most of Vancouver's limited land base to foster innovation, identity, and sustainability in every neighborhood.

Supporting Policy	Description	No.	Related Goals
Airfield Compatibility and Airspace Protection	Ensure land uses, development patterns and building heights in areas surrounding Pearson Airfield and Portland International Airport flight paths are compatible with aviation operations and do not interfere with active airspace.	**13**	LU-4
Maximize the Utilization of Existing on Street Parking	Implement strategic pricing mechanisms to regulate the availability of on-street parking in Mixed-Use Neighborhood and Regional Activity Centers.	**88**	TM-2, LU-4
Mixed Income Housing	Develop incentives to integrate below market housing as part of new market rate housing projects.	**90**	H-5, H-6, LU-4
Periodically Reassess Land Use	Assure consistency of overall land use and capital facilities plans by reevaluating Vancouver's land use plan and code to ensure regulations are facilitating intended outcomes and the City is able to provide necessary public facilities and services to implement the plan.	**100**	PFS-1, LU-4
Program Underutilized Spaces	Encourage the thoughtful reuse and activation of underutilized lands—such as space beneath freeway viaducts, oddly shaped parcels, utility corridors, temporarily vacant lots, and other non-developable remnants typically under 1 acre—by establishing public-private partnerships to program them to serve community, cultural, and environmental needs.	**106**	CE-1, CE-4, LU-4, PR-2

Supporting Policy	Description	No.	Related Goals
Proportional Fees	Establish proportional impact fees and system development charges based on size of unit for residential uses while ensuring cost recovery.	**107**	PFS-1, LU-4
Regional Planning	Coordinate closely with Clark County, other cities, and other government entities, such as C-TRAN, the Regional Transportation Council (RTC), and school districts, to sustainably manage UGAs, efficiently deliver urban services, expand regional transit and multimodal connectivity, and coordinate on shared goals and responsibilities, in accordance with adopted countywide planning policies.	**122**	LU-4, CL-3, TM-2, TM-1
Shared Parking and Redevelopment of Existing Parking	Encourage shared parking strategies to improve land efficiency and reduce redundant parking supply. Incentivize the redevelopment of large, underutilized surface parking areas into more productive uses that support redevelopment and other community-serving needs.	**133**	LU-4, CE-1
Streamline the Development Process	Simplify the development review process where feasible and as needed to reduce permitting timelines and improve housing costs.	**138**	H-1, LU-4
Transitions Between Zones	Develop regulations that provide transitions between zoning districts to ensure compatibility of adjacent land uses.	**155**	LU-4
Underdeveloped Lots and Brownfields	Prioritize, facilitate and incentivize development on infill and underutilized lots and clean up brownfield sites.	**157**	LU- 3, LU-4, LU-1, PFS-1, CL-4

Chapter 3 - Key Implementing Actions

- ✓ Advance redevelopment priorities in Waterfront Gateway, the Heights, the Fourth Plain Operations Center, and Library Square.
- ✓ Assess City-owned properties for opportunities to advance housing, small business, and placemaking goals.
- ✓ Update the Shoreline Master Program to reference the new development code and VMC Title 20.
- ✓ Develop a Middle Housing Production Strategy that advances non-regulatory strategies and incentives to support middle housing infill.
- ✓ Develop subarea plans for St. Johns/St. James, Vancouver Mall, and the 136th/137th Corridor.
- ✓ Develop a place-based action plan for the Walnut Grove neighborhood.
- ✓ Develop a responsive and efficient process for the 2027 Annual Review Program and future needed code changes.
- ✓ Review, update, and standardize the Development Agreement structure, process, and fees.
- ✓ Coordinate implementation of the citywide Equitable Development Strategy.
- ✓ Update VMC Titles 16 and 17 to require commercial-ready fire suppression and separation for ground-floor residential uses in the Ground Floor Active Use Ready overlay.
- ✓ Update VMC Titles 12 and 22 to align with the Comprehensive Plan.

Housing



4

Introduction

Adequate, safe, and affordable housing for all residents is essential to the health of a community. This chapter describes Vancouver's existing housing conditions and the direction the City will take to meet community housing needs from 2025 to 2045. Chapter includes goals and policies to address long-standing housing underproduction and to better accommodate the diverse housing needs of the whole community across the income spectrum. Like other communities across the state, Vancouver is facing serious housing challenges, including an existing deficit of housing to meet the needs of current residents, rising homelessness, limited attainability and affordability, and prices that continue to push homeownership out of reach for many families. Addressing these challenges will require improved access to a broad range of housing types, the development of innovative housing products, and greater allowances for emergency, transitional and permanently supportive housing, all while supporting equitable outcomes and minimizing displacement. This plan aims to close the gap in housing needs by addressing Vancouver's unique community and market conditions,



Vision: Housing

Vancouver is a community where people have many choices about where they will live, all within thriving, active and affordable neighborhoods that they are proud to live in. We envision a future where housing is affordable and accessible to everyone and reflects the diversity of housing needs in the community. We commit to increasing opportunities for homeownership and wealth creation and prioritizing the needs of historically excluded communities. Our strategy aims to maximize the number and range of housing options available, embrace non-traditional design, construction and ownership methods, add middle, culturally specific and multigenerational housing, and increase housing options near essential services like education, healthcare, grocery stores, childcare, and recreation opportunities.

and builds on the City of Vancouver's existing Housing Action Plan (see Appendix A, Housing Action Plan).

In order to develop housing goals and policies, we first need to understand the housing market in 2025. The Housing Needs Assessment (Appendix D), summarized below, identifies the range of housing needs by analyzing the best available data describing Vancouver's housing stock, workforce, household demographics, housing market dynamics, and expected housing demand. The analysis answers questions about the current availability of different types of housing, who lives and works in the Vancouver area, and what range of housing is needed to meet current and future housing needs. Vancouver, like other communities in the region, has changed over the years and housing needs have not been successfully met. The affordability of housing has changed, and access to housing has never been equal, especially for families with lower incomes and communities of color. The Housing Needs Assessment was prepared in 2023 using the best available data at that time (primarily 2022 data). Where possible, demographic data and statistics in this chapter were updated to 2023 or 2024, to include the most recent available data in an effort to highlight consistent trends. The year associated with various data points is noted throughout the chapter.

Community Feedback

- Center equity and historically excluded communities in housing policy.
- Provide a diverse mix of housing types that meet different needs, incomes, cultures, and sages of life of community members.
- Increase housing supply and densify strategically to mitigate impacts.
- Make housing and homeownership affordable and attainable.
- Prevent and address houselessness by increasing housing and supportive services.
- Support aging in place and housing for people with disabilities.
- Locate housing near essential services, transportation options, employment and educational opportunities, and green space.
- Prevent displacement and protect vulnerable residents, including seniors, renters, and households with low income.

Community Demographic and Household Trends

Population Growth. Vancouver and the region have grown substantially over the last two decades and are projected to continue to grow over the 20-year planning period (2025-2045). From 2000 to 2023, Vancouver's population, including annexation areas, grew by just over 56,000 residents, or 39 percent, which is slightly higher than Washington State (35 percent) but lower than Clark County

as a whole (53 percent)[6]. The pandemic may have shifted or accelerated migration patterns and housing preferences permanently, and Portland outmigration has contributed to Clark County's rapid growth.

Demographics. Vancouver's population is getting older. The share of Vancouver residents aged 65 years and older increased from 13 percent in 2011 to 16 percent in 2023, a higher share than in Clark County overall. The share of residents under 20 years remained about the same, at 24 percent of the population[7].

Vancouver became more racially and ethnically diverse over the last decade. From 2011 to 2023, the Hispanic/Latino population increased by 8 percent (from 9 to 17 percent), while the Asian and Black populations remained about the same (5 and 3 percent, respectively)[8].

Income. Vancouver households tend to have lower incomes compared to Clark County. In 2023, the city's median household income was around $80,000 per year, roughly $17,000 less than the countywide median of $97,000. In addition, a larger share of Vancouver households earn less than $75,000 and a smaller share earn more than $100,000 annually than the county overall.[9] As of 2023, the AMI determined by the U.S. Department of Housing and Urban Development for the Portland-Vancouver-Hillsboro Metropolitan Statistical Area was $114,400 for a family of four.

Key Demographics and Trends

- **39%** population growth from 2000 to 2023
- **8%** Hispanic/Latino population increase from 2011 to 2023
- **16%** residents age 65+ (2023)
- **$80k** median household income (2023)
- **7%** decrease in households with children between 2011 and 2021
- **1 in 3** Vancouver residents work in Vancouver (2022)

Household Size. Vancouver's average household size decreased slightly from 2.4 persons in 2011 to 2.3 in 2023 and the overall share of households with children declined. The share of one- and two-person households increased, while three- and four-person households decreased.[10] In addition, the percent of households with children in Vancouver dropped by 7 percent between 2011 and 2021.[11]

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[6] Washington State Office of Financial Management analysis of U.S. Census data, 2021: https://ofm.wa.gov/washington-data-research/population-demographics/population-estimates/population-density
[7] ACS 1-Year Data Tables, Table S0101, 2023
[8] ACS 1-Year Data Tables, Table B03002, 2011, 2023
[9] ACS 1-Year Data Tables, Table S1901, 2023
[10] ACS 1-Year Data Tables, Table S2501, 2011, 2023
[11] ACS 1-Year Data Tables, Table S1101, 2011, 2021

Employment Location. About a third of people (30,655) employed in Vancouver live in Vancouver, which is higher than all nearby jurisdictions, except Portland (2022). The second most common workplace destination for Vancouver residents is Portland (2022).[12] As of 2021, the City of Vancouver had a higher jobs-to-housing ratio than the County's goal of 1:1, with 1.18 jobs for every household compared to 0.82 jobs for every household in Clark County[13] (see Appendix E, Economic Conditions and Opportunities Analysis). This trend is reflective of Vancouver's role as an employment hub but could also indicate a shortage of housing options available for people who work in Vancouver.

Existing Housing Conditions, Types, Tenure, Affordability, and Market Trends



The cost of housing in Vancouver rapidly increased over the last decade. Median home sale prices nearly tripled and average rents increased over 90 percent, from $879 to $1,683, between 2012 and 2023[14]. During the same period, average income increased 76 percent when adjusted for inflation[15]. The widening gap between housing costs and incomes indicates declining attainability and affordability in Vancouver's ownership and rental market. Rents in Vancouver have now surpassed those in Portland[16].

Approximately half of Vancouver households rent their homes and half own their homes, which is a similar homeownership rate as other nearby cities, but lower than Clark County (67 percent) and the state (66 percent).[17]

Renters are three times more likely to be cost burdened (when a household spends 30 percent or more of its monthly income towards housing costs) compared to homeowners. In 2023, 53 percent of renters were cost burdened and 26 percent were severely cost burdened (households paying

[12] Office of Financial Management, LODES, 2010-2022
[13] Office of Financial Management, LODES, 2011-2021
[14] Redfin, 2023. Data not adjusted for inflation
[15] ACS 1-Year Data Tables, Table S1901, 2012, 2023
[16] CoStar
[17] ACS 1-Year Data Tables, Table B25003, 2023





50 percent or more of monthly income towards housing costs).[18] This highlights the need for more affordable rental units and increased homeownership opportunities, particularly for households with low and moderate incomes.

In 2023, Vancouver's dominant type of housing was single-family detached, which comprises nearly half (48 percent) of the total number of housing units in the city. This is a slightly lower share of single-family detached than Clark County overall (65 percent). Vancouver's other housing stock as of 2021 consists of multifamily housing (buildings of five or more units), accounting for 35 percent of total units citywide and attached housing "plexes" (two to four units) accounting for 16 percent of citywide housing.[19] Vancouver's existing housing supply reflects market conditions and policy choices over the years. The 2011 Comprehensive Plan zoned approximately 46 percent of citywide land for low-density single-family residential housing with new small, attached types permitted only through additional review. The remaining 54 percent of citywide land accommodated all multifamily, commercial, office and industrial uses combined. Vancouver has a higher share of existing multi-unit housing than Clark County overall, with significant development occurring in recent years. Of the land use applications proposing multifamily or plex housing received between 2019 and 2025, 89 percent were for new multifamily housing developments that had more than five units. This points to future opportunities to diversify the housing mix, especially expanding middle housing options like duplexes, triplexes, and townhomes.

Racial disparities exist in Vancouver's housing access. White households have significantly higher rates of homeownership than Hispanic and/or Black households and are less cost burdened by housing ownership or rental expenses.[20] See the Equity Lens section of this chapter for more information about racially disparate impacts.

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[18] ACS 1-Year Data Tables, Table B25091, 2023
[19] The U.S. Census provides generalized survey-based information describing the main categories of housing units, including single-family detached, "plex housing" (which includes townhomes and row homes, and buildings up to four units), and multifamily (five or more units). ACS 1-Year Data Tables, Table B25024, 2023.
[20] SEVA, ACS 5-Year Estimates, 2017-2021

Vancouver provides most of the existing affordable housing in Clark County, with 1,447 rent-restricted affordable units sponsored by the City's Affordable Housing Fund that are either existing or currently in progress for development as of 2025. Of these units, 32 percent are set aside for seniors and 9 percent of the units are set aside specifically for populations with special needs or mental health issues. All housing units sponsored by the Affordable Housing Fund must serve households below 50 percent AMI.

Housing Needs



Continued strong population growth is anticipated through the planning period. Clark County adopted a total population forecast of 718,154 persons countywide in 2045, which requires 103,696 new housing units. Vancouver's population is estimated to increase to 281,000 by 2045. The City of Vancouver's allocated housing share to accommodate is **36,527 new housing units.** In order to accommodate new population growth and address the existing housing deficit and associated affordability crisis, the City of Vancouver is planning for **38,129 new housing units by 2045**. This means an estimated 1,733 housing units need to be built on average per year from 2023 to 2045 to meet the City's projected housing need.

Under state law, new housing is required to be affordable at different income levels. The 2045 housing unit targets shown in Table 3 include units for Permanent Supportive Housing (PSH)[21] and extremely low (<30% AMI), low (30-80% AMI), moderate (80-100% AMI), middle (100-120% AMI), and high (>120% AMI) incomes. Additionally, the City needs to plan for an additional 1,405 emergency shelter beds[22].

[21] Permanent Supportive Housing is "subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors" Washington RCW 36.70A.030(31).

[22] Emergency Units are "temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement." - Washington RCW 36.70A.030(14).

Table 3. City of Vancouver Future Housing Need by Income Category[23]

Income Category	Units Needed
0 to ≤30% AMI (PSH)	2,600
0 to ≤30 AMI (nonsubsidized)	4,423
>30 to ≤50%	5,890
>50 to ≤80%	5,788
>80 to ≤100%	3,351
>100 to ≤120%	3,175
>120% AMI	12,902
Total	**38,129**

The analysis indicates that about one-third of new housing units will need to be affordable to households at or below 50 percent of AMI. Historically, building new units that are affordable to households making 60 percent of median income or below require significant public subsidy to make development and long-term affordability feasible. To date, the state has allocated no new resources to support the development of additional rent restricted units affordable at this level. This is further addressed in Appendix P, Housing Needs and Land Capacity Analysis.

To ensure the availability of land to meet the identified housing need by income level, price data and land capacity were analyzed. Table 4 identifies the level of affordability anticipated to be achieved within each zone based on housing prices derived from an 18-month price trend. Table 3 and Table 5 summarize housing needs and capacity by income level and Comprehensive Plan and Zoning Designations. The analysis indicates a net capacity surplus of 5,983 units across the city and capacity surplus for all income levels. See the Capital Facilities Forecast section of Chapter 9: Public Facilities and Services for more details on how capital facilities will serve anticipated growth and housing needs over the next 20 years.

[23] The housing units needed by income category vary from the units allocated to the City from Clark County, as the City completed their housing analysis using the Washington State Department of Commerce Housing for All Planning Tool (HAPT), prior to the City receiving Clark County housing allocations. Appendix P Housing Needs and Land Capacity Analysis includes a section "Aligning Vancouver Housing Needs with County Allocation" that demonstrates Vancouver's capacity to meet the need by income band using either the HAPT tool or the County allocation.

Table 4. Affordability Level and Housing Type by Zoning Designation

Zoning Designation	Typical Housing Types Allowed	Lowest Potential Income Level Served, Market Rate	Lowest Potential Income Level Served, with Subsidies	Assumed Affordability Level of Capacity Analysis
Manufactured Home Park	Manufactured homes	Low to moderate income 30 to 80% AMI	Very low to low income <30 to 60% AMI	Low income 0 to 80% AMI
Low-Scale Neighborhood	Single-family residential building, townhouse/ rowhouse, stacked multi-plex building, multi-cluster building, cottage court building	High income 100 to >120% AMI	Moderate income 80 to 120% AMI	Higher income 100 to >120% AMI
Residential Neighborhoods	Single-family residential building, townhouse/ rowhouse, stacked multi-plex building, multi-cluster building, cottage court building, multifamily building	Moderate income >80 to 120% AMI	Moderate income >80 to 120% AMI	Moderate income >80 to 120% AMI
Urban Mixed-Use	Townhouse/ rowhouse, stacked multi-plex building, multi-cluster building, cottage court building, multifamily building, mid-rise residential building, mixed-use residential building	Moderate income >80 to 120% AMI	Low to moderate income <50 to 80% AMI	Low to moderate income 0 to 100% AMI, PSH
Urban Mixed-Use	Multifamily building, mid-rise residential building, mixed-use residential building	Moderate income >80 to 120% AMI	Low to moderate income <50 to 80% AMI	Low to moderate income 0 to 100% AMI, PSH
Employment Mixed Use	Townhouse/ rowhouse, stacked multi-plex building, multi-cluster building, multifamily building, mid-rise residential building, mixed-use residential building	Moderate income >80 to 120% AMI	Low to moderate income <50 to 80% AMI	Low to moderate income 0 to 100% AMI, PSH
ADUs (All Zone Categories)	Accessory dwelling units on developed residential lots	Moderate income 60 to 120% AMI	N/A	Moderate income 60 to 120% AMI

Source: Clark County Assessor, CoStar, Redfin, ECOnorthwest

Table 5. Housing Capacity by Income Level

Income level (% AMI)	Comp Plan Designations (Zoning Districts) Serving These Needs	Aggregated Housing Need	Total Capacity	Capacity Surplus
0-80% AMI • 0-30% AMI (PSH) • 0-30% AMI (Other) • >30-50% AMI • >50-80% AMI	Residential Neighborhoods (Manufactured Home Park); Urban Mixed-Use (Mixed-Use Neighborhood); Urban Mixed-Use (Regional Activity Center); Employment Mixed Use (Institutional/Campus)	18,701	21,012	2,311
>80-120% AMI • >80-100% AMI • >100-120% AMI	Residential Neighborhoods (Medium-Scale Neighborhood)[24]	6,526	6,647	121
>120%AMI	Residential Neighborhoods (Low- and Medium-Scale Neighborhood)	12,902	16,423	3,551
Total	**N/A**	**38,129**	**44,112**	**5,983**

Source: City of Vancouver, WSP, ECOnorthwest

While this analysis indicates the land use and zoning in the land use map meet the city's housing needs, additional financial subsidies are required to meet the need for housing at 0-80 percent AMI levels. This analysis was conducted to identify what level of subsidy would be required on an annual basis to build below market rate housing that is needed across the city using the two most available funding sources for affordable and middle-income housing – the Multifamily Tax Exemption (MFTE) Program and the Low Income Housing Tax Credit program. The subsidies needed per unit for these income levels was identified via the funding gap necessary to target affordability at these income levels, see details in Table 6.

[24] 42% of Medium Scale Neighborhood capacity assumed in 80-120% AMI and 58% of capacity in >120% AMI capacity.

Table 6. Annual Subsidy Needed to Deliver Below Market Rate Housing

	0 to 50% AMI	50 to 80% AMI
Total units needed by income depth	12,913	5,788
Estimated number of units needed annually	646	289
Applicable funding program for respective unit depth	Tax credits	MFTE
Estimated number of units delivered annually by applicable program	130	195
Estimated share of potential units covered by applicable program	20%	67%
Estimated remaining annual units not funded	516	94
Estimated subsidy need per unit	$400,000	$325,000
Total subsidy needed annually	$206,260,000	$30,680,000

Emergency housing, emergency shelters, and transitional housing are allowed uses by right in all zones across the city that allow residential and lodging uses. Vancouver has a need for an additional 1,405 emergency shelter beds by 2045. Table 7 summarizes the total acres of zoned capacity where emergency housing, emergency shelters, and transitional housing are allowed.

Table 7. Zoned Capacity by Zoning Designation Where Emergency Housing and Shelters Are Allowed Uses

Zoning Designation	Acres
Manufactured Home	205
Low-Scale Neighborhood	5,830
Medium-Scale Neighborhood	6,304
Mixed-Use Neighborhood	2,707
Regional Activity Center	1,569
Institutional/Campus	1,168

In addition to new units built for households with low income, filtering is another pathway to increase availability of affordable housing units in the market. Filtering assumes housing units are most expensive when new and as these housing units age, the price decreases over time, slowly becoming more affordable. Filtering requires a sufficient supply of housing units in the market, with new units more likely to be occupied by higher income households and older units occupied by lower income households.[25] Vancouver's housing supply is currently insufficient for filtering to function as a method to provide a sufficient supply of housing affordable to lower incomes. Increasing Vancouver's housing supply will support the filtering process. The goal of 1,733 units per year on average spreads out housing needs equally over the 20-year Comprehensive Plan time horizon and is intended to guide land use planning decisions and actions that accommodate the total number during this time period. However, the City's 10-year Housing Action Plan front loads needed housing production and calls for 2,500 units per year to meet current housing needs rather than wait the full 20 years of the Comprehensive Plan time horizon. The Housing Action Plan calls on the City to enact policies to

[25] Filtering of Apartment Housing between 1980 and 2018

increase housing production as soon as possible to meet housing needs. The land use designation changes as part of the Comprehensive Plan update also support the shorter timeline identified in the Housing Action Plan, reflecting City Council direction to "pull every lever" to meet current and anticipated housing needs as soon as possible.

The zone districts map (Chapter 3, Land Use and Development, Figure 9) simplifies citywide zoning districts to 10 new zones, 6 of which allow residential uses. Per the updated zoning districts and the City's adopted land use map, there is capacity for an additional 44,100 housing units in Vancouver.

The land use map and new zoning districts increase capacity for new housing units citywide and allow for a greater diversity of housing types given market feasibility and redevelopment potential. In comparison to the current land use map, the new one designates more land for higher-intensity multifamily development types through the application of Medium Scale Neighborhood, Mixed-Use Neighborhood, and Regional Activity Center zoning districts. These denser zoning districts allow for a broader range of housing types with more and smaller units, and more potential for lower cost units. Zoning code standards are intended to be easier and simpler to understand, which may also reduce the costs and barriers to housing production.

New state laws require the City of Vancouver to allow for at least four dwelling units per lot on all lots in single-family zones, and up to six dwelling units per lot if within a quarter mile of a major transit stop, or if two of the units are affordable. Lands designated Low Scale Neighborhood have the potential for a greater diversity of housing types, such as duplexes, quadplexes, sixplexes, and townhomes than current low-density zoning districts.

Affordable and Senior Housing



The required zoning updates will allow for greater density, a broader array of housing types and sizes, and new housing units throughout the city. However, there are challenges to building housing that serves all households, especially those with lower incomes. In general, the higher capacity for new housing units allows for greater opportunities to construct different smaller housing typologies, which in turn have the potential to be more affordable for a broader range of household income levels. However, certain households will likely not be served by the private market without additional subsidies for housing. Development of regulated affordable housing can face a number of challenges and typically requires substantial public subsidy to make these projects financially feasible to build.

The City is committed to increasing affordable housing throughout the community and to pulling every lever available to achieve the housing goals. In addition to regulatory changes, permitting fee

reductions, and process improvements, the City leverages the following programs and sources of funding to support rent-restricted affordable housing development.

- The City's Affordable Housing Fund supports people experiencing very low income in Vancouver by providing affordable housing and services.[26] Established in 2016, it awarded funds of almost $20 million between 2017 and 2023 and supported production of 701 new rent-restricted affordable housing units. This levy was renewed by voters to provide $100 million in additional funding for affordable housing from 2024 through 2033.[27] Of the $100 million allocated for 2024 through 2033, $60 million goes towards housing production and preservation, $20 million for rent assistance and housing services, $10 million for temporary shelter, and $5 million each towards homeownership and implementation. The Housing Needs Assessment includes a full list of income-restricted, project-based affordable housing sponsored by the City's Affordable Housing Fund. As of 2025, there are 1,447 rent-restricted units designated for various populations in Vancouver (including both completed and in-progress projects and those supported by the Affordable Housing Fund, as well as other public sources).
- The HOME Investment Partnerships program is a federal Department of Housing and Urban Development (HUD) entitlement fund that supports rental assistance, housing construction, preservation, acquisition, and homeowner/homebuyer assistance for households making 60 percent AMI or below (rental assistance/units) or 80 percent AMI or below (homeownership assistance/units).
- The Community Development Block Grant (CDBG) program is a Federal HUD entitlement that supports homeowner/homebuyer assistance for households making 60 percent AMI or below (rental assistance) or 80 percent AMI or below (home ownership).
- The Multifamily Tax Exemption (MFTE) incentive is a state authorized property tax exemption for market rate and income restricted multifamily housing projects. Projects offering 20 percent of units at or below 80 percent AMI receive 12-year property tax exemption. Market rate projects pay into a Fee-in-Lieu Fund.
- The Affordable Housing Fee-in-Lieu Fund is funded by contributions from MFTE market rate projects and supports development of affordable housing and property acquisition for future development for households making 60 percent AMI or below (rental units) or 80 percent AMI or below (homeownership units).
- Impact Fee Waivers waive up to 80 percent of park and traffic impact fees for new affordable housing developments affordable to households making up to 80 percent of AMI.
- Construction Sales Tax Deferral (CSTD) defers sales and use taxes for new construction of multifamily housing on public parking lots for 10 years, for projects affordable at 80 percent AMI (rental units) and 115 percent AMI for (homeownership units).

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[26] https://city-of-vancouver-wa-geo-hub-cityofvancouver.hub.arcgis.com/documents/CityOfVancouver::affordable-housing-fund-investment/explore
[27] https://www.cityofvancouver.us/economic-prosperity-and-housing/affordable-housing-fund/

- The Affordable Housing Sales Tax and Sales Tax Credit are state enabled sales tax revenue streams that fund affordable and supportive housing.
- Dedication of $10 million from the American Rescue Fund Act to acquire properties for future affordable housing development.
- Historically, the City has utilized Real Estate Excise Tax (REET) to acquire land for future affordable housing development.
- The City actively supports project utilization of State programs and funding for affordable housing in Vancouver and southwest Washington, including WSHFC tax credits, the Housing Trust Fund, the Connecting Housing to Infrastructure Program (CHIP) to cover water and sewer infrastructure and connection fees, and legislative appropriations.

The availability of housing for seniors (65 years or older) is important to track and assess to ensure the city has sufficient housing for the growing senior population. From 2011 to 2023, Vancouver's senior population (aged 65 years or older) increased by three percentage points, from 13 to 16 percent of the total population, likely increasing the demand for senior housing facilities and units that allow for aging in place. Addressing housing needs for those aged 65 years and above will require a range of housing opportunities. For example, while the 82-to-86-year cohort dominates the assisted living and more intensive care sector, new or near-retirees may prefer aging in place or active, age-targeted communities.[28] Immigration status and ethnicity play a role in the likelihood of living in multigenerational households, with older Asian and Hispanic community members more likely to live in a multigenerational household than White or Black community members.[29] Households with adults 65 years or older have different income profiles from the general working age population that require them to make distinctive housing choices. For instance, seniors with low income may not have the financial resources to live in a nursing home and may instead choose to downsize to smaller, more affordable units. Others with nearby relatives may choose to live in multigenerational households. The aging of the Baby Boomer generation will very likely increase the demand for smaller "downsized" housing options and housing with assistance and age-in-place amenities.

[28] Source: Urban Land Institute (2018). Emerging Trends in Real Estate, United States and Canada
[29] Source: Herbert, Christopher and Hrabchak Molinsky (2015). Meeting the Housing Needs of an Aging Population. https://shelterforce.org/2015/05/30/meeting_the_housing_needs_of_an_aging_population/

Accessory Dwelling Units



Accessory dwelling units (ADUs) are defined as one or more rooms with private bath and kitchen facilities comprising an independent, self-contained dwelling unit within or attached to a single-family dwelling or in a detached building on the same lot as the primary dwelling unit.[30] ADUs are primarily found in low- and medium-scale neighborhood zones and are permitted in all residential zoning districts in Vancouver that contain a single-family home. State legislation referred to as House Bill 1337 requires cities like Vancouver to allow up to two ADUs on a residential lot, assuming compliance with development regulations.

ADUs provide homeowners the ability to establish separate living quarters within or adjacent to their home and increase the range of housing options and supply of accessible and affordable housing units in the community.[31] In 2024, Vancouver updated its current development code to comply with this legislation, and the new code will also incorporate compliant standards. Based on the new allowances for two ADUs per lot and recent trends in ADU development, Appendix P, Housing Needs and Land Capacity Analysis, identifies capacity for 1,280 ADUs in Vancouver through 2045.

Connected and Accessible Neighborhoods

Connected and accessible neighborhoods are intended to support a mix of uses within a 15-minute walk, bike, or roll to provide access to essential services like grocery stores, childcare, education, and healthcare, as well as opportunities for shopping, entertainment, cultural amenities, and employment within proximity to housing.

The placement of higher density residential zones near commercial areas and transit routes increases the potential for a substantial amount of new housing in connected and accessible neighborhoods. As summarized in Table 8, 44.1 percent of the new housing capacity is in areas with five or more existing services or amenities within walking distance. These services or amenities include full-service grocery stores, transit stops, parks and open spaces, trails, libraries, ambulatory healthcare services, schools, and other essential places, such as higher education institutions. This proximity to services benefit resident well-being in terms of access to healthcare, food and daily needs, as well as opportunities to interact with others. Additional details about connected and accessible neighborhoods are available in Appendix F, Community Atlas, and Chapter 3, Land Use and Development.

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[30] VMC 20.810.020
[31] VMC 20.810.010

Table 8. Estimated Capacity for New Housing Units in Connected and Accessible Neighborhoods

Metric	Housing Units
Projected Capacity for New Housing Units in Connected and Accessible Neighborhoods	21,502
Percent of Total Projected Capacity for New Housing Units	44.1%

Displacement Risk

As Vancouver continues to grow and housing demand rises, the city faces new challenges related to involuntary displacement of existing households. Housing underproduction, combined with a highly competitive regional market, exerts upward pressure on housing costs, which poses significant challenges for communities, particularly vulnerable populations. "Displacement risk" describes when these pressures in the real estate market could force households to relocate due to rising costs for housing or increased feasibility and interest in redevelopment. The goals and policies in this Comprehensive Plan are designed to mitigate displacement in high-risk areas to reduce the unintended consequences of new development and growth and facilitate long-term equitable development across the city.

Those at the greatest risk of housing displacement include:

- **Households with low incomes and children in the home, particularly those who rent**, are at greatest risk of being forced to move due to rising rents, because they have limited ability to cover rent increases and may already be facing tradeoffs between paying rent and covering other basic needs for their household. Washington State and local regulations offer some protections for renters, including caps of annual rent increases and notice requirements for rent increases and evictions. Under Washington's recently passed statewide rent control laws, private property owners may increase rent up to 7 percent plus the Consumer Price Index, or 10 percent, whichever is less.[32] There are exceptions for the control of rent in buildings under public-private agreements to provide regulated affordable housing.[33] Taken together, these protections may delay, but do not ultimately prevent, displacement of households with low incomes.
- **Adults without college degrees** have less ability to increase their income to cover higher housing costs and may have to work multiple low-wage jobs to make ends meet. Educational attainment (as well as income) is not protected under federal housing legislation, leaving these adults more vulnerable to discrimination.
- **Black, Indigenous, and People of Color (BIPOC)**—particularly people who are Black, Indigenous, and/or Latinx—tend to face greater housing discrimination and may have a harder time finding other housing if they are forced to move. Race, color and national origin are all protected by the Fair Housing Act, but the long history of racist housing policies in the United

[32] HB1217 Landlord Resource Center https://www.commerce.wa.gov/housing-policy/hb1217-landlord-resource-center/.
[33] RCW 36.01.130 pre-empts jurisdictions from adopting local rent control ordinances, but other state regulations provide some protections around notice to vacate.

States continues to impact household wealth and housing options for many BIPOC and families. The legacy of these practices contributes to ongoing disparities in homeownership and housing cost burdens nationwide. Past policies that excluded people of color from homeownership have played a role in systemically preventing the accumulation of generational wealth. In contrast, many White families have benefited from long-term property appreciation. This is an example of how historic discrimination and exclusion has contributed to persistent disparities by race and ethnicity related to housing generally and displacement risk specifically.

- Additionally, **households with limited English proficiency, people with disabilities, and adults age 65+** face unique challenges to finding and securing housing due to language barriers and accessible housing options.

The City of Vancouver created a Displacement Risk Assessment Map (Figure 11) to better understand displacement pressures citywide and further the City's equity goals by pairing investments with anti-displacement strategies in areas shown to have greater displacement risk.

Table 9 outlines how socioeconomic vulnerability, location-specific demographic change, and housing market dynamics are analyzed to understand displacement risk. The risk assessment uses the demographic factors described above to measure socioeconomic vulnerability[34] to displacement. Whether or not demographic change is underway, Table 9 indicates the extent to which displacement is already occurring. Housing market data, specifically trends in home sales prices, indicates where market pressures are or are likely to increase prices. The year 2007 was used as the base year for housing market data in order to capture prices when the market was at its peak before the 2008 crash; changes in home values looked at changes between 2010 and 2020. The City's Displacement Risk Assessment Map is updated every five years using new data. The methodology included seven different categories of displacement risk, based on the combination of socioeconomic vulnerability factors and real estate market trends by census tract, grouped into early-, mid-, or late-stage gentrification as defined in Table 9.[35]

Table 9. Description of Displacement Risk Typologies

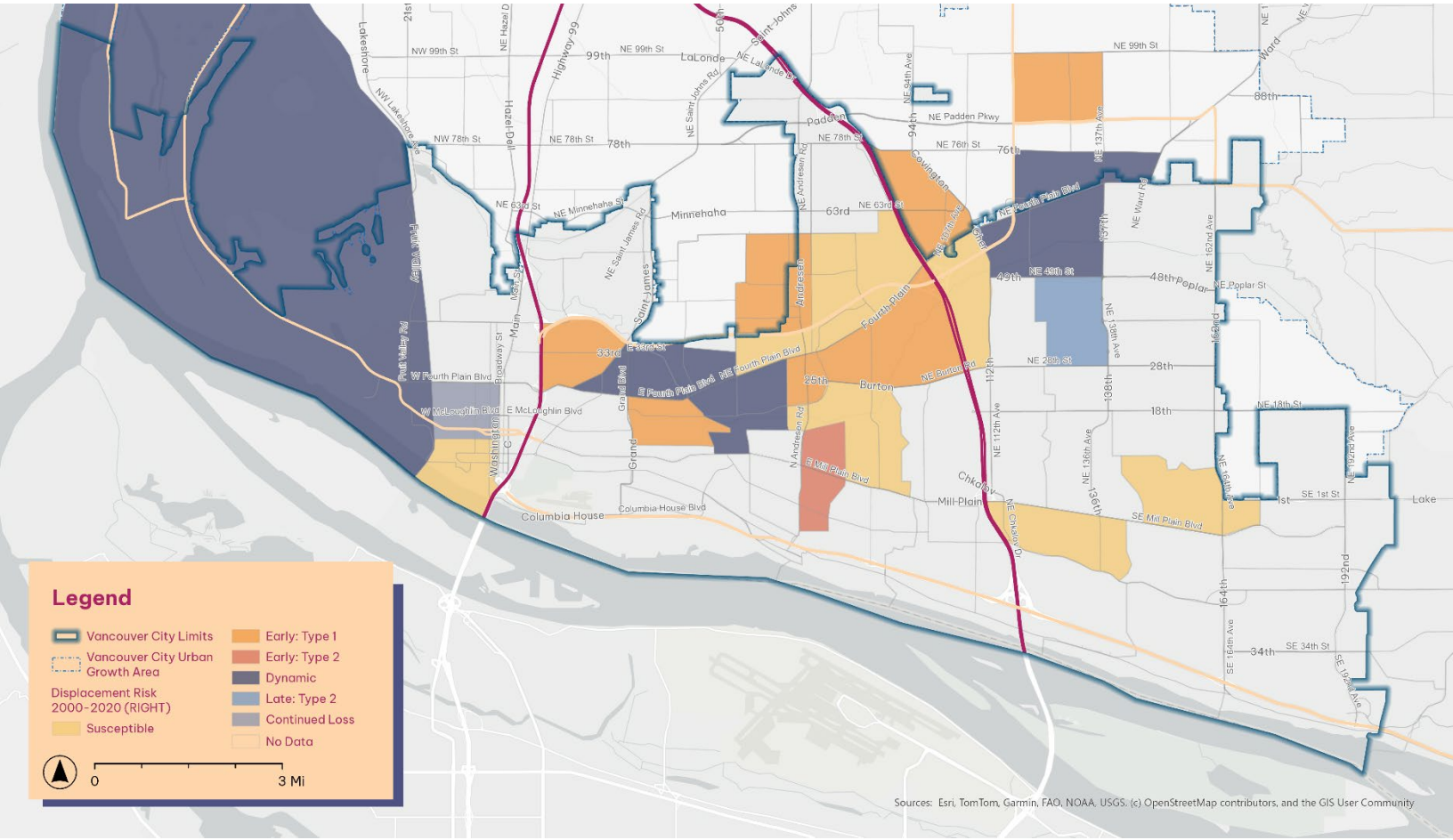
Gentrification Stage	Typology	Vulnerable Population	Demographic Change	Housing Market
Early-stage Gentrification	Susceptible	Higher share	No	Low to moderate, adjacent to high or increasing values
Early-stage Gentrification	Early: Type 1	Higher share	No	Low to moderate, high appreciation since base year

[34] The City's study defined vulnerable tracts by analyzing the distribution of quintile scores, and then set the threshold at approximately the 75th percentile.
[35] City of Portland Bureau of Planning and Sustainability, "Gentrification and Displacement Neighborhood Typology Assessment," October 2018.

Gentrification Stage	Typology	Vulnerable Population	Demographic Change	Housing Market
Early-stage Gentrification	Early: Type 2	Higher share	Yes	Low to moderate, adjacent to high or increasing values
Mid-stage Gentrification	Dynamic	Higher share	Yes	Low to moderate, high appreciation since base year
Late-stage Gentrification	Late: Type 1	Higher share	Yes	High
Late-stage Gentrification	Late: Type 2	Lost previous high share	No	Low to moderate, appreciation since base year
Late-stage Gentrification	Continued Loss	Lost previous high share	No	High

Per the Displacement Risk Assessment, of the 64 census tracts within or intersecting the city's boundaries, 14 census tracts in Vancouver face early-stage gentrification. Four tracts face mid-stage gentrification, and one is in late-stage gentrification. Late-stage gentrification means a neighborhood has lost an increasing share of vulnerable populations over the study period and is facing rising housing costs (see Appendix D, Housing Needs Assessment, for additional details and methodology). The Image Neighborhood is the only area that has reached late-stage gentrification based on the City's methodology. The Fourth Plain Village and North Image Neighborhoods fall into the Dynamic category, which refers to areas where new anti-displacement actions can still help to prevent loss of vulnerable populations before the areas reach more advanced displacement types. Neighborhoods facing early-stage gentrification are concentrated in Central Vancouver, including along Fourth Plain Boulevard, I-205, and State Route 500. In these areas, preserving low-cost housing and preventing displacement of vulnerable populations can help keep neighborhoods from advancing into mid- or late-stage gentrification.

Figure 11. Displacement Risk Map, Vancouver, 2010-2020



The most effective anti-displacement strategies vary by location-specific characteristics and displacement stage. Reside Vancouver, an anti-displacement plan developed in 2020, identifies recommended strategies for preventing displacement, which include citywide strategies, as well as geographically specific strategies for the Fourth Plain Corridor. Table 10 shows estimated capacity for new housing units in areas considered high displacement risk. Goals and policies throughout this Comprehensive Plan aim to prevent displacement by preserving existing low-cost housing, creating new affordable housing options, increasing economic opportunities for residents, and supporting homeownership to stabilize households. The City's Equitable Development Strategy identifies a range of strategies to ensure equitable development and reduce displacement pressures and incorporates existing work from the Heights Equitable Development Strategy, citywide Economic Development Strategy, and Housing Action Plan, as well as new best practice research and community-identified priorities.

Table 10. Estimated Capacity for New Housing Units in High Displacement Risk Areas

Metric	Housing Units
Projected Capacity for New Housing Units in High Displacement Risk Areas	8,897
Percent of Total Projected Capacity for New Housing Units	18.2%

The Washington State Department of Commerce published a displacement risk map that similarly shows areas on the west, north-central and east sides of the city as being higher risk for displacement based on market trends, demographic change and social vulnerability.



Equity Lens: Racially Disparate Impacts

The Washington State House Bill 1220 included a component to ensure that new and existing housing policy addresses and mitigates racially disparate impacts, displacement and exclusion. See Appendix G, Racially Disparate Impacts Analysis, for additional data and information.

- **Displacement**: The process by which a household is forced to move from its community because of conditions beyond their control (can include physical, economic and/or cultural displacement).
- **Exclusion in housing**: The act or effect of shutting or keeping certain populations out of housing within a specific area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts.
- **Racially disparate impact (RDI)**: When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

Historically, policies—such as redlining, restrictions in Veterans Administration homeownership loans, and housing covenants—resulted in segregated housing and limited the ability of people of color to gain generational wealth. Today in Vancouver, people of color are more likely to live in multifamily housing, rent instead of own their home, be housing cost burdened (spending more than 30 percent of income on housing), rely on public transit or carpooling for commuting, and live in areas of the city with less tree canopy. This data demonstrates racially disparate impacts exist in the community.

The Comprehensive Plan update includes goals and policies to directly address increasing housing production, providing diverse and affordable housing types, preventing displacement of existing residents, and increasing access to homeownership specifically for those who have previously been excluded from buying a home.

Goal: H-1 Housing Production

In 2045, the city will have added a minimum of 38,000 net new housing units to its current stock, eliminating the current housing deficit and providing enough housing to serve Vancouver's diverse and growing community.

Vancouver's housing supply in 2045 will serve the entire community, regardless of income, age, disability status, educational attainment, or household composition. It will do this by providing a range of diverse housing options affordable to a broad spectrum of incomes. The City will need to take a broad range of actions, pull multiple levers and find new and innovative ways to support housing production. This includes changes to Vancouver's land use map and zoning code occurring as part of this Comprehensive Plan periodic review cycle, which seeks to simplify the development code, provides flexibility, and reduces the time, process and cost associated with new development. These updates will provide greater clarity to applicants and the community, minimizing unnecessary delays in the review of residential permit applications. In addition to changes to regulations and process, meeting housing production goals will require additional implementation steps that could include fee reductions or exemptions, advocating for new resources at the state and federal levels, updating existing or developing new incentive programs, and supporting innovative design and construction methods.

In order to support the construction of housing that's affordable to low- and extremely low-income households, the City will continue to partner with local, state, and national agencies to secure supportive funding for the construction of rent-restricted, permanently affordable housing, as these levels of affordability are not supported by the private market without substantial subsidies and/or incentives.

Supporting Policy	Description	No.	Related Goals
Broaden Equitable Access to Natural Spaces and Parks	Increase equitable access to natural spaces and parks by investing in new and improved facilities in underserved neighborhoods and siting new accessible housing close to existing and future parks.	**23**	CL-4, PR-3, H-1, EI-2
Housing Innovation	Promote and remove regulatory barriers to new financing methods, homeownership models and design and construction techniques.	**67**	H-1, CE-4
New Funding Methods for Affordable Housing	Explore and develop additional funding methods and resources to support affordable housing and community ownership opportunities.	**96**	H-1, H-6
State Level Housing Reform	Advocate for state legislation, regulatory reform, and sustained funding that support condominium development, expand homeownership opportunities, and increase resources for the production and preservation of affordable housing across income levels.	**135**	H-1, H-2
Streamline the Development Process	Simplify the development review process where feasible and as needed to reduce permitting timelines and improve housing costs.	**138**	H-1, LU-4

Goal: H-2 Diverse & Accessible Housing

A wide range of new housing types are provided to fit a variety of household sizes, cultures, incomes, and abilities, and where community members can access housing that meets their needs at all stages of life.

A wide range of housing types and sizes is needed to ensure all community members can find housing that meets their needs throughout their lives. This goal focuses on expanding housing choice by encouraging more diverse housing types, scales, and densities that respond to changing household sizes, ages, incomes, and abilities, while improving access to services and amenities.

The City's policy approach emphasizes reducing regulatory barriers and modernizing zoning and development standards to better align with housing needs. Historically, Vancouver's housing stock has been constrained by limited housing types and density patterns that artificially constrain housing production and do not reflect today's demographics. To address this, the City will support middle housing forms—such as two- to six-unit plexes, townhomes, cottage clusters, courtyard apartments, and stacked flats and accessory dwelling units—in all low- and medium-scale neighborhoods.

Accessibility is a central component of this goal. As the population ages and the need for inclusive housing grows, policies will encourage accessible design that supports aging in place and multigenerational living. The City will also work with community-based partners to facilitate culturally specific and identity-based housing that reflects the lived experiences and needs of Vancouver's diverse communities.

Together, these policies support a housing system that is more adaptable, inclusive, and responsive, and provides more options, so that people can remain in their neighborhoods as their needs change. By allowing a greater range and size of housing in neighborhoods across the city, including those with existing services, new housing provides more people with access to connected, accessible neighborhoods.

Supporting Policy	Description	No.	Related Goals
Aging Populations	Ensure that residents have support for aging within community and downsizing through diverse housing options near accessible services and reliable transit to ensure long-term livability and independence.	12	EI-3, H-2
Allow Middle Housing	Increase housing diversity by allowing a range of missing middle housing types (duplexes, triplexes, townhomes, cottage clusters, and courtyard apartments) in low- and medium-intensity residential areas to expand affordability and accessibility.	16	H-2
Analyze and Mitigate Displacement Risk	Analyze and mitigate for displacement pressures and risks prior to making large-scale public investments.	17	E-1, H-2, H-4, PFS-1
Culturally Specific and Identity-based Housing	Work with partners to facilitate and fund housing that reflects the cultures, identities and needs of Vancouver's unique population groups, and for the equity priority communities identified in this plan.	42	H-2, CE-2, EI-1, H-4
Income-restricted Housing	Facilitate development of income-restricted housing, particularly in areas near transit and services.	71	H-2, EI-1, LU-1
Incorporate Universal Design Principles	Incentivize universal design principles in private development. Support accessibility retrofits for existing homes and prioritize affordable housing options tailored to multigenerational living, aging in place, and a wide range of abilities.	74	EI-2, PR-1, H-2

Supporting Policy	Description	No.	Related Goals
Multigenerational Households	Incentivize development of housing types suitable for multigenerational living.	92	EI-3, H-2
State Level Housing Reform	Advocate for state legislation, regulatory reform, and sustained funding that support condominium development, expand homeownership opportunities, and increase resources for the production and preservation of affordable housing across income levels.	135	H-1, H-2

Goal: H-3 Reduce Homelessness

The City and its partners work collectively to provide adequate transitional, permanently supportive, and affordable housing in the community, so that all residents have access to safe and stable housing.

Ensuring that all residents have access to safe and stable housing requires coordinated action to address homelessness across the housing continuum. This goal focuses on expanding and sustaining emergency shelters and transitional, permanently supportive, and affordable housing so that individuals and families experiencing housing instability can move toward long-term stability.

The City's policy approach centers on partnership, preservation and targeted investment. Vancouver will continue working with local, state and national partners to secure funding and resources for emergency shelter beds, transitional housing, permanently supportive and rent-restricted permanently affordable housing, recognizing that these housing types are rarely delivered by the private market. Policies emphasize integrating housing with services to support individuals with disabilities, behavioral and mental health needs, and other barriers to housing stability.

In addition to expanding housing options, the City will prioritize preserving existing affordable and supportive housing, including naturally occurring affordable units, to prevent further loss of low-cost housing. Protecting existing stock is a critical component of reducing homelessness and preventing households from falling into housing instability.

By aligning housing policy with service delivery and regional efforts, this goal advances a coordinated response to homelessness that prioritizes stability, dignity, and improved long-term outcomes.

Supporting Policy	Description	No.	Related Goals
Emergency Rental Assistance	Provide financial support to help at-risk households remain in their homes, preventing eviction and displacement.	**45**	H-4, EI-1, H-3
Permanently Supportive Housing	Expand the availability of permanently supportive housing and emergency shelter beds with integrated services for people with disabilities, houseless individuals, and at-risk populations.	**101**	H-3
Preserve Existing Affordable Housing	Preserve the existing stock of affordable housing and discourage conversion of income-based housing to more expensive market rate housing when affordability restrictions end.	**105**	H-3, H-4, LU-1

Goal: H-4 Prevent Displacement

The City and its partners work collectively to prevent displacement of community members due to direct impacts and market forces by providing resources that support residents remaining stably and securely housed.

As Vancouver grows and housing demand increases, preventing involuntary displacement is essential to maintaining community stability and equity. This goal focuses on minimizing displacement driven by rising housing costs, redevelopment pressures, and public investment and increasing access to homeownership opportunities—particularly for renters, low-income households, and communities of color who face disproportionate risk.

The City's policy approach emphasizes early intervention, targeted protections, affordable home ownership strategies, and equitable development practices. Using displacement risk data, the City will prioritize anti-displacement strategies in areas most vulnerable to market pressure. Policies support tenant protections, emergency rental assistance, relocation assistance, right of first refusal, and community ownership models that help residents remain housed or return to their communities if displacement occurs. Preventing displacement also includes supporting existing homeowners, particularly low- and moderate-income households, through home repair and preservation programs that help residents remain safely housed as neighborhoods change. In areas experiencing new development or public investment, policies will encourage community benefits that deliver tangible outcomes—such as affordable housing, local hiring, and community facilities—while reducing unintended impacts.

Together, these strategies aim to ensure that growth and investment strengthen neighborhoods without displacing the people who live there.

Supporting Policy	Description	No.	Related Goals
Access to Non-traditional Homeownership Methods	Broaden access to homeownership for first-time owners, low-income residents, and other groups frequently priced out of homeownership through alternative ownership methods.	3	EI-1, H-4, H-5, H-6,
Analyze and Mitigate Displacement Risk	Analyze and mitigate for displacement pressures and risks prior to making large-scale public investments.	17	E-1, H-2, H-4, PFS-1
Culturally Specific and Identity-based Housing	Work with partners to facilitate and fund housing that reflects the cultures, identities and needs of Vancouver's unique population groups, and for the equity priority communities identified in this plan.	42	H-2, CE-2, EI-1, H-4
Emergency Rental Assistance	Provide financial support to help at-risk households remain in their homes, preventing eviction and displacement.	45	H-4, EI-1, H-3
Incorporate Community Benefits into Development	Integrate community benefits into private developments involving discretionary land use approval or City redevelopment efforts while maintaining project feasibility.	73	H-4, EI-4
Preserve Existing Affordable Housing	Preserve the existing stock of affordable housing and discourage conversion of income-based housing to more expensive market rate housing when affordability restrictions end.	105	H-3, H-4, LU-1
Reduce Displacement in the Face of New Growth	Implement anti-displacement strategies and actions that protect residents and businesses in advance of public investment so communities can remain in place and benefit from improvements.	112	H-4, EI-1
Right of First Refusal and Sweat Equity	Explore models and opportunities for existing residences and businesses to have right of first refusal to purchase property when it's being sold, or build an equity stake in the property over time.	127	H-4, EO-1

Goal: H-5 Access to Homeownership

Homeownership is attainable for people across the income spectrum, particularly communities previously excluded from buying a home through racial covenants and discriminatory lending practices.

Homeownership remains an important pathway to housing stability and wealth creation, yet many Vancouver residents have been excluded from ownership opportunities due to historic and ongoing barriers. This goal focuses on expanding access to homeownership across incomes, with particular attention to communities previously excluded through discriminatory policies and practices.

The City's policy approach centers on broadening the pathways to ownership rather than relying on a single housing product or market condition. Rising land costs, construction expenses and financing barriers have made traditional ownership models unattainable for many residents. In response, policies under this goal support a wider range of ownership structures and development approaches that reduce upfront costs and maintain long-term affordability while still allowing households to build equity. To advance this goal, the City will align land use policy, development incentives, and housing programs to encourage ownership opportunities within new residential development, including mixed-income and mixed-tenure projects. Partnerships with nonprofit organizations and housing providers will be critical to implementing alternative ownership models that stabilize households and preserve affordability over time.

By addressing structural barriers and supporting a broader range of ownership options, these policies aim to ensure that homeownership remains a viable option for current and future residents and contributes to neighborhood stability and intergenerational wealth building.

Supporting Policy	Description	No.	Related Goals
Access to Non-traditional Homeownership Methods	Broaden access to homeownership for first-time owners, low-income residents, and other groups frequently priced out of homeownership through alternative ownership methods.	3	EI-1, H-4, H-5, H-6,
Affordable Homeownership	Facilitate homeownership opportunities through assistance programs, grants, and other methods that reduce barriers to entry for low- and moderate-income households.	11	H-5, H-6
Mixed Income Housing	Develop incentives to integrate below market housing as part of new market rate housing projects.	90	H-5, H-6, LU-4

Goal: H-6 Affordable Housing

Vancouver community members have access to affordable housing regardless of income, including market rate and income-based housing options, and the City prioritizes long-term preservation of existing affordable units.

Housing affordability remains one of the most significant challenges facing Vancouver, particularly for households with incomes below the citywide median. This goal focuses on expanding and preserving affordable housing options to ensure that residents across income levels can access safe, stable housing and remain in the community as the city grows.

The City's policy approach recognizes that the private market does not deliver deeply affordable housing and requires sustained public leadership, funding, and coordination. Policies under this goal emphasize long-term affordability through a combination of direct investment, strategic use of public land, and regulatory and financial incentives that support affordable housing development and preservation. To meet housing needs by income band over the planning time horizon, the City will continue to leverage local funding sources, pursue partnerships with nonprofit and public housing providers, and advocate for more public resources to build and preserve permanently affordable, rent-restricted housing options. Policies also support integrating affordable housing into areas with access to transit, services, and employment, helping to reduce transportation costs and improve access to opportunity.

Ongoing monitoring and evaluation are essential components of this approach. The City will track housing production, affordability levels, and program outcomes to assess progress toward housing targets and adjust strategies as needed. Together, these policies establish a framework for sustained investment in affordable housing that supports community stability, equity, and long-term resilience.

Supporting Policy	Description	No.	Related Goals
Access to Non-traditional Homeownership Methods	Broaden access to homeownership in the community for first-time owners, low-income residents, and other groups frequently priced out of through alternative ownership methods.	3	EI-1, H-4, H-5, H-6,
Acquire Land for Affordable Housing Development	Pursue strategic acquisition and use existing City-owned land for affordable housing.	6	H-6
Affordable Homeownership	Facilitate homeownership opportunities through assistance programs, grants, and other methods that reduce barriers to entry for low- and moderate-income households.	11	H-5, H-6
Mixed Income Housing	Develop incentives to integrate below market housing as part of new market rate housing projects.	90	H-5, H-6, LU-4
New Funding Methods for Affordable Housing	Explore and develop additional funding methods and resources to support affordable housing and community ownership opportunities	96	H-1, H-6

Chapter 4 - Key Implementing Actions

- ✓ Update the Multifamily Tax Exemption (MFTE) Program to align with Comprehensive Plan centers.
- ✓ Update the Housing Action Plan to reflect needs identified in the Comprehensive Plan.
- ✓ Advance housing priorities for City-led redevelopment projects, including Waterfront Gateway, the Heights, the Fourth Plain Operations Center, and Library Square.
- ✓ Expand resources for strategic land acquisition to support future affordable housing development.
- ✓ Expand resources to support affordable and workforce housing development.
- ✓ Preserve existing affordable housing through rehabilitation and acquisition strategies.
- ✓ Implement the City's Rental Registration Program.
- ✓ Finalize and operate the Bridge Shelter.
- ✓ Advance regulatory and fee reforms that avoid adding cost or delay to housing development and, where possible, actively reduce barriers to housing production.

Economic Opportunity



5

Introduction

A vibrant local economy is critical to ensuring a high quality of life in our community. To ensure access to living wage jobs and business opportunities, the City must support and encourage the growth of its economy in inclusive and strategic ways to deliver shared prosperity. We must learn from the past and seek opportunities to continue Vancouver's transition into an economic driver of the region and state over the next 20 years.

Vancouver's strategic location along the confluence of several rivers has sustained human settlement for thousands of years. As the city grows and changes, its geography and connection to the river remains an important asset. The Chinook people lived in what is now Vancouver for 10,000 years before European contact, and their proximity to the Wimahl ("big river"), now referred to as the Columbia River, allowed them to become prolific traders who lived in relative abundance. In 1825, the original Hudson's Bay Company established Fort Vancouver as the regional center of commerce.



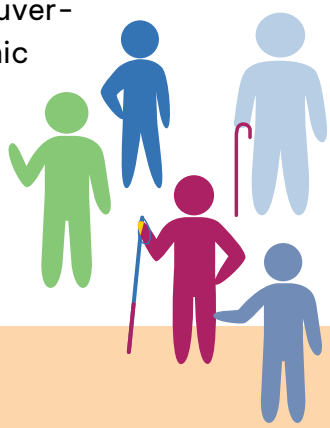
Vision: Economic Opportunity

We envision a future where all community members have access to stable jobs that allow them to support themselves, their families and communities. We commit to prioritizing wealth creation and financial stability for historically excluded groups, growing economic opportunity for all, developing a green economy that mitigates the impacts of climate change, and supporting innovation in business and industry. We recognize that access to housing and childcare is essential to building a resilient and equitable economy. We believe in community-centered economic development that focuses on people and uplifts our existing workforce while providing options for those who will be here in the future. We commit to building and strengthening partnerships to support small businesses and startups, expand workforce training opportunities, break down barriers to entry and promote upward mobility, particularly for historically underserved and excluded communities.

After the company relocated to Canada, and until World War II, Vancouver's economy was composed of logging and lumber mills, railroads and agriculture, primarily prune farming.

World War II brought industry, primarily shipbuilding, and a growing population to Vancouver, but a decline in industrial jobs after the war led to unemployment, population loss and disinvestment, particularly in the Black community. The construction of I-5 and later the I-205 further disrupted the existing urban fabric of the city, making downtown more difficult to access and encouraging growth in more suburban settings.

More recently, Vancouver has attracted a growing and diverse community and economy. Situated in the heart of the Pacific Northwest, Clark County is exceptionally well positioned to access major West Coast, Midwest and international markets. Currently, the City of Vancouver encompasses 51.84 square miles and has an estimated 2023 population of 196,441. It is the fourth most populous city in Washington State and the second largest city in the Portland-Vancouver-Hillsboro Metropolitan Statistical Area. Vancouver is considered an economic hub of both the region and state, benefitting from proximity to three deep-water ports (Port of Vancouver, Port of Portland, and Port of Columbia County), the Portland International Airport, two interstate highways (I-5 and I-205), and two freight rail lines (BNSF Railway and Union Pacific Railroad).



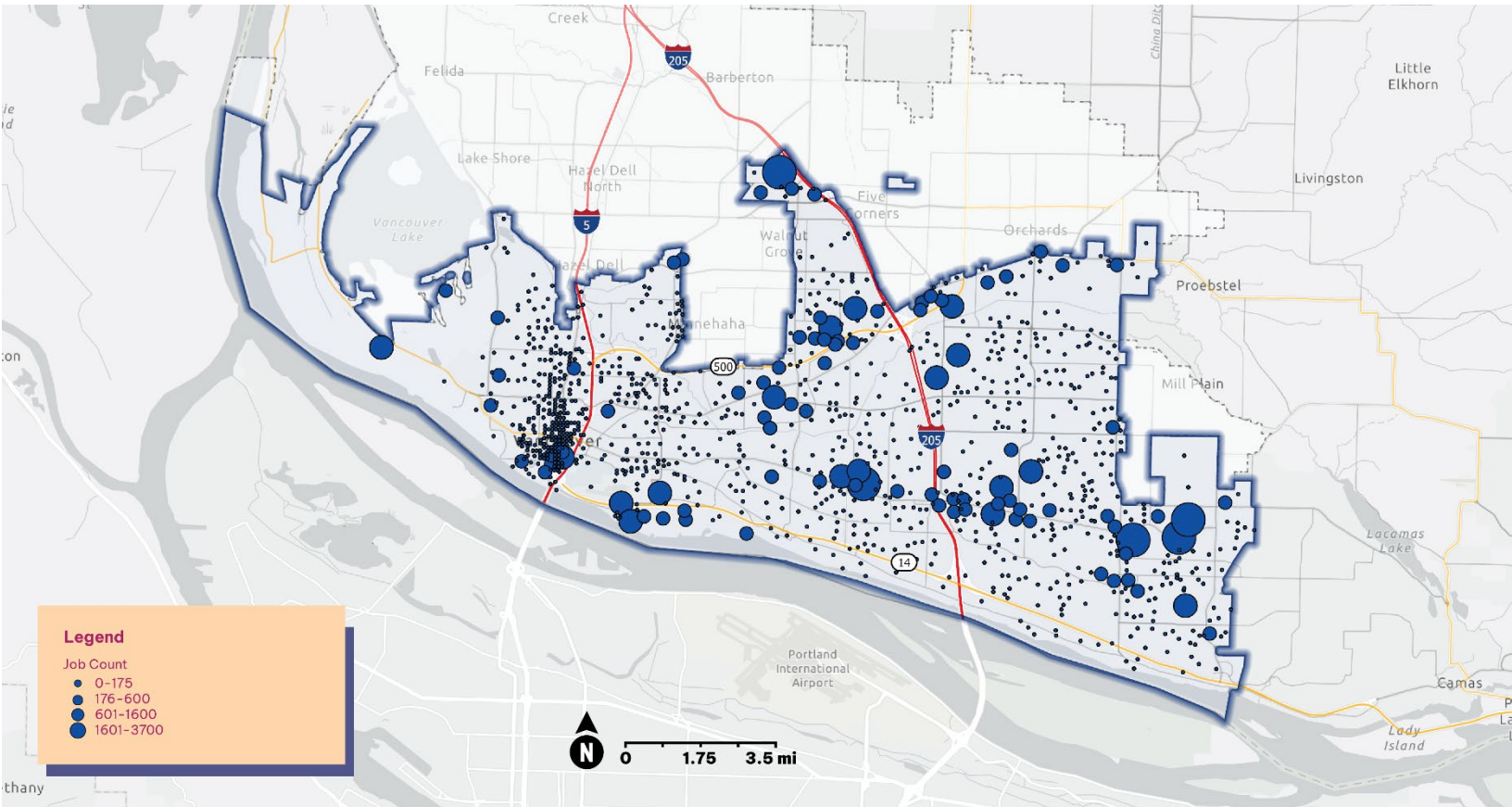
Community Feedback

- Strong desire for more neighborhood-serving businesses, such as restaurants, coffee shops, grocery stores, arts facilities, and shops.
- Broad support for small business growth and prevention of commercial displacement.
    - Ideas for initiatives included incubator spaces, food carts, technical assistance, and affordable commercial rents to support local businesses.
- Support for equitable access to economic opportunity, particularly through addressing education disparities, supporting youth workforce development, mixed-income neighborhoods, and ensuring large employers contribute to housing and workforce stability.
- Interest in locating jobs closer to where people live, including having more employment centers in neighborhoods, flexible zoning for home-based businesses, and mixed-use areas that reduce commuting.
- Redevelopment of underutilized land seen as a major opportunity.
    - Vancouver Mall, parking lots, NE 40th & Andresen, Section 30, and areas north of Mill Plain were cited as prime sites for new economic activity.
- Support for diverse, livable-wage jobs and workforce training, with particular interest in trade schools, apprenticeships, and pathways to jobs that keep pace with rising living costs.
- Mixed views on industrial uses and commercial compatibility.
    - Some support preserving industrial lands for job growth, but there are concerns about industrial uses near homes and a desire to separate incompatible uses.

Vancouver's Economy

Vancouver's economy is undergoing a transformative shift. As the city attracts a more professional, service-oriented, and creative workforce, the city is becoming less dependent on traditional manufacturers and more dependent on knowledge-based industries to drive economic growth (Figure 12). Vancouver has experienced rapid population growth over the past two decades, attracting more educated and higher-income workers in targeted sectors like computers and electronics, software, clean tech, metals and machinery manufacturing, and life sciences. The growth and transformation are due to a combination of factors, including the city's lack of income tax, recent investments in public infrastructure, access to outdoor amenities, and a relatively lower cost of living compared to other West Coast locations. Because of these factors and a revitalized Urban Core, Vancouver has grown into a desirable place for many in the region to live, resulting in in-migration. In particular, white-collar workers gaining greater locational flexibility due to remote work during the COVID-19 pandemic have shifted or accelerated migration patterns and housing preferences permanently. Overall, outmigration of workers from Portland has contributed to Clark County's rapid growth, as well as more families and peak earning workers leaving Oregon in recent years.

Figure 12. Counts and Density of All Jobs, Vancouver, 2020[36]



[36] Census OntheMap

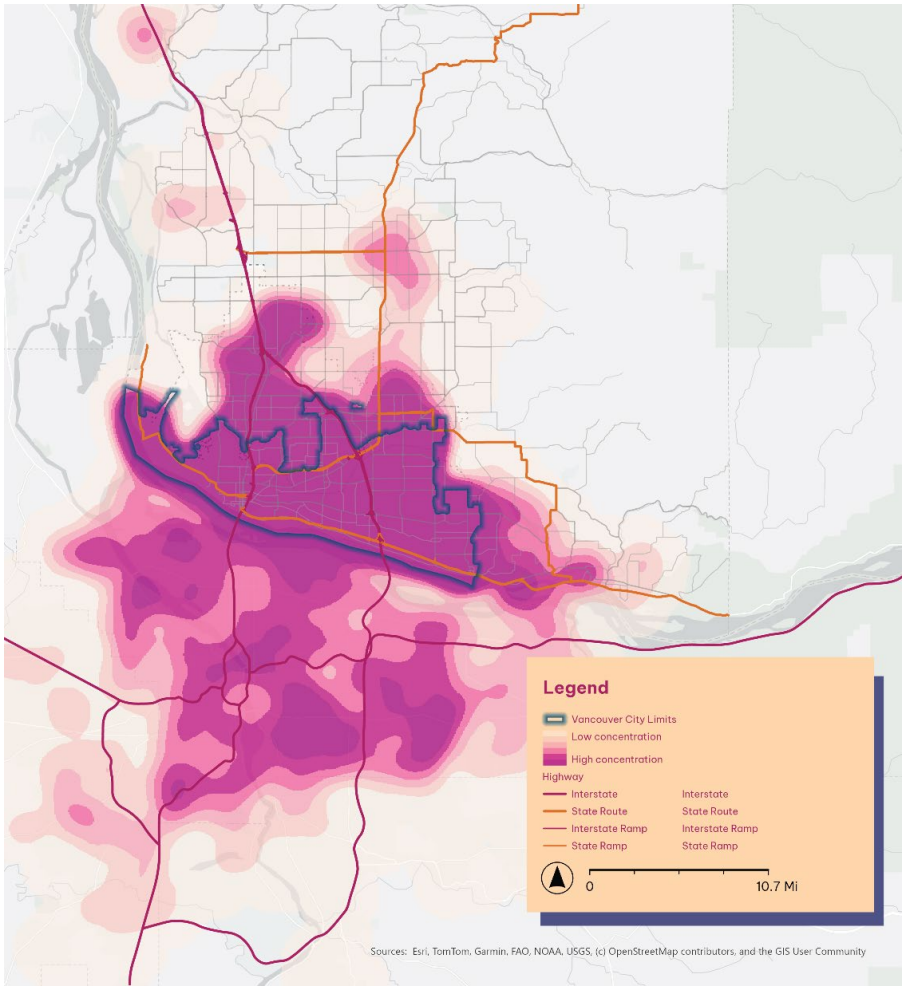
With rising demand for housing, Vancouver has seen increasing housing costs, rising displacement pressures, and economic disparities among communities. In particular, people of color in Vancouver face higher levels of cost burdening, lower median incomes, lower rates of homeownership, and lower rates of educational attainment. In 2023, the median incomes of Black households or Hispanic or Latino households were below the median income in Vancouver.[37]. Housing cost burden was also most prevalent for Black and Hispanic or Latino households, indicating additional economic burdens.

The City of Vancouver has several employment centers dispersed throughout the city supporting a higher concentration of jobs (see figure 13 below). Vancouver's downtown area located near I-5 has the highest concentration of employment, with other centers around major employers like Clark College, the Port of Vancouver, PeaceHealth medical facilities along Mill Plain Boulevard, the Vancouver Mall and other strip shopping centers along State Route 500, and technology and innovation hubs, such as Vancouver Innovation Center (VIC) on the east side.

Vancouver's Workforce

The region's growth includes more educated and early working age adults, and higher income households. An increasingly educated and skilled workforce can help attract and retain employers, including those in the Columbia River Economic Development Council's (CREDC) current target industry clusters for the county (computers and electronics, software, clean tech, metals and machinery, and life sciences). A portion of this skilled workforce in occupations allowing for locational flexibility (such as tech-intensive industries) could work remotely at least part of the time or in co-working spaces rather than full time at a centralized office space. As of 2023, approximately 16.2 percent of Vancouver's workers worked remotely and 53 percent of these

Figure 13. Workplace Location of Vancouver Residents (2020)



[37] 2023 American Community Survey

workers earn over $65,000 per year[38] (see Appendix D, Housing Needs Assessment, for more information).

Compared to the national average, Vancouver has higher-than-average employment concentrations in the transportation and real estate sectors. An estimated 70 percent of people who *work* in Vancouver *live* outside the city, while approximately 39.5 percent of people who *live* in Vancouver *work* outside the city.

As higher-income households move into the city, it is likely to increase housing costs and displacement pressures for lower-income households. Renters are nearly three times as likely to be cost burdened than homeowners, with over a quarter of renters severely cost burdened, spending more than 50 percent of income on rent. In Vancouver, Black households and Hispanic or Latino households experience the highest rates of cost burden. Chapter 3, Land Use and Development, and Chapter 4, Housing, of the plan address housing disparities in Vancouver and include goals and policies that aim to provide diverse housing opportunities for all residents.

Workforce in 2023

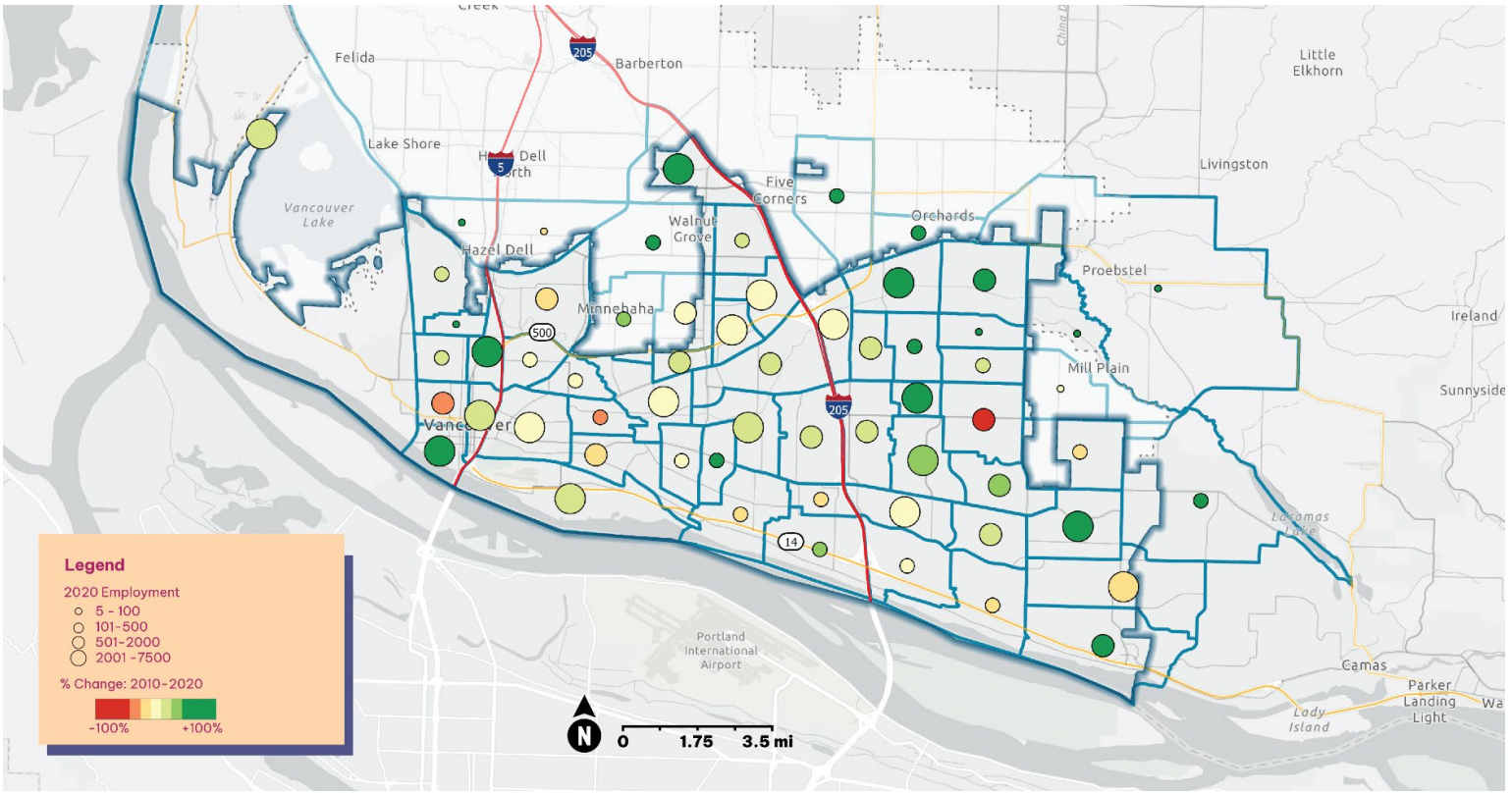
- **13.2k** Net job increase in Clark County
- **62.4%** Work in white-collar professions
- **19.4%** Work in blue-collar professions
- **18.2%** Work in the service sector
- **70%** of workforce lives outside city limits
- **66%** of residents work outside city limits

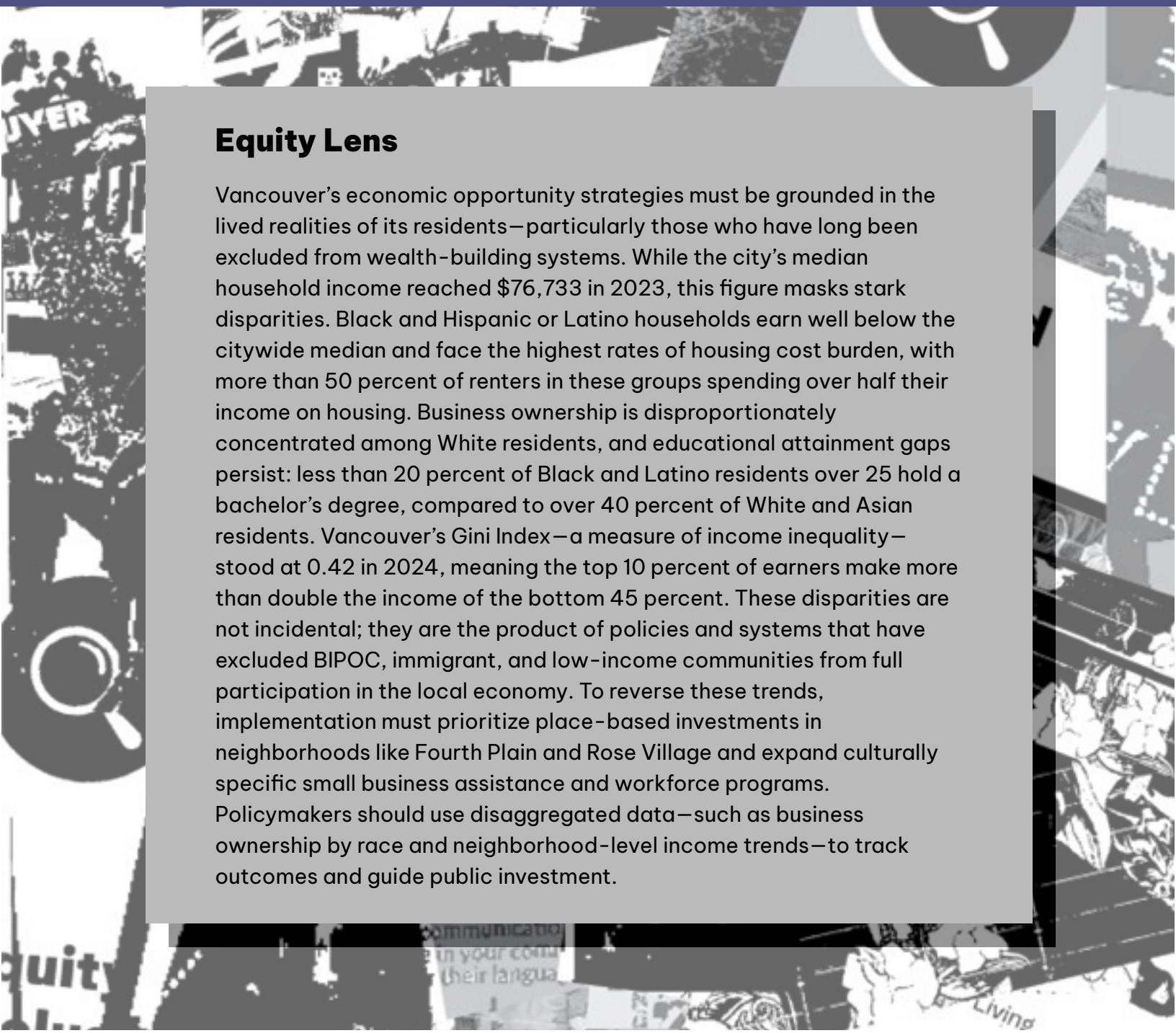
Employment Land

Clark County recently adopted a countywide employment projection of 269,000 total jobs to be used with the County's 2025 Comprehensive Plan Update. Vancouver is projected to add anywhere between 46,000 new jobs and 49,000 new jobs citywide by 2045, and an additional 18,221 jobs in its UGA by 2045 (the most of any jurisdiction in the county). According to U.S. Census data (see figure 14 below) between 2010 and 2020, Downtown Vancouver, the Columbia Business Center in East Vancouver, and the 122nd Avenue corridor have absorbed the most job growth. Areas surrounding the Vancouver Mall have seen the greatest overall decrease in employment.

[38] 2023 American Community Survey

Figure 14. Change in Employment by Census Tract, Vancouver, 2010-2020 (LODES 2020)





Equity Lens

Vancouver's economic opportunity strategies must be grounded in the lived realities of its residents—particularly those who have long been excluded from wealth-building systems. While the city's median household income reached $76,733 in 2023, this figure masks stark disparities. Black and Hispanic or Latino households earn well below the citywide median and face the highest rates of housing cost burden, with more than 50 percent of renters in these groups spending over half their income on housing. Business ownership is disproportionately concentrated among White residents, and educational attainment gaps persist: less than 20 percent of Black and Latino residents over 25 hold a bachelor's degree, compared to over 40 percent of White and Asian residents. Vancouver's Gini Index—a measure of income inequality—stood at 0.42 in 2024, meaning the top 10 percent of earners make more than double the income of the bottom 45 percent. These disparities are not incidental; they are the product of policies and systems that have excluded BIPOC, immigrant, and low-income communities from full participation in the local economy. To reverse these trends, implementation must prioritize place-based investments in neighborhoods like Fourth Plain and Rose Village and expand culturally specific small business assistance and workforce programs. Policymakers should use disaggregated data—such as business ownership by race and neighborhood-level income trends—to track outcomes and guide public investment.

The goals and policies in this plan are consistent with the City's Economic Development Strategy and support a balance of jobs for workers in diverse fields that are resilient to fluctuations in the global and regional economy and pay living wages that allow workers to continue to live in Vancouver. Workforce development programs can contribute to a more equitable and sustainable local economy by targeting disadvantaged groups. Additionally, this plan includes inclusive economic development policies that prioritize both the growth and retention of industries that provide employment opportunities for those without advanced degrees or specialized skills, such as traditional manufacturing jobs, construction-related jobs, or labor in skilled trades.

Goal: EO-1 Invest in People

Vancouver has a robust local economy that supports communitywide prosperity, with a range of employment opportunities that provide stable, family-wage jobs, and an ecosystem of training and skill building resources to build the workforce of the future.

Vancouver's ability to build a resilient, inclusive economy hinges on whether all residents can access stable, family-wage employment. This goal recognizes that economic development is not just about business recruitment or industrial land capacity, but enabling human potential. The policies supporting this goal work to reduce barriers to education and employment, expand access to affordable and available childcare, support small business ownership in historically excluded communities, create clear and equitable pathways into high-demand careers, and create opportunities for generational. wealth.

While Vancouver is attracting higher-income residents and businesses in growing sectors like professional services and tech, these opportunities have not been widely shared. BIPOC households continue to experience lower median incomes, higher housing cost burdens, and lower educational attainment rates, underscoring the need for intentional, equity-focused economic policy. Service sectors like retail, education, and healthcare—which employ a large portion of Vancouver's workforce—often do not provide living wages, and the City's ability to close that gap depends on investments in workforce training, apprenticeships, small business support, and a competitive business climate.

Vancouver's high jobs-to-housing ratio and rising cost of living create real barriers for low-income families working and living in the city. By coordinating across these policy areas, Vancouver can ensure that new economic growth translates into shared prosperity. Measurable indicators, such as the number of living-wage jobs, the successful launch and growth of small businesses, access to affordable childcare, apprenticeship placements, and post-secondary enrollment, will help the City track its progress toward the vision and adjust strategies to meet the evolving needs of the community.

Supporting Policy	Description	No.	Related Goals
Access to Education and Employment	Reduce barriers to accessing education and employment opportunities, so all community members can reach their full potential.	**2**	EI-1, EO-1
Right of First Refusal and Sweat Equity	Explore models and opportunities for existing residences and businesses to have right of first refusal to purchase property when it's being sold, or build an equity stake in the property over time.	**127**	H-4, EO-1
Support Access to Childcare	Support the development of new childcare facilities in the city and eliminate regulatory barriers preventing their creation.	**143**	EI-3, EO-1
Support Small Businesses	Foster inclusive economic growth through education and resources that support small business owners, entrepreneurs and members of historically excluded and underserved communities.	**150**	EO-4, EO-1, EI-1
Workforce Development and Career Pathways	Expand access to career pathways, workforce training and entrepreneurship opportunities that lead to living-wage jobs and wealth creation, with a focus on underrepresented communities.	**163**	EO-1, EI-1, CE-4

Goal: EO-2 Thriving Economy and Industries

By 2045, Vancouver will have added 43,200 new jobs by attracting diverse businesses and industries, fostering innovation and entrepreneurship, supporting local small businesses and startups, leveraging new technologies, and providing the infrastructure, workforce, and resources the economy needs to thrive and grow sustainably.

Vancouver's economic competitiveness in 2045 will be measured not just by the number of jobs added, but by the quality, diversity, and sustainability of the businesses and industries that fuel economic growth. The city is projected to add over 43,200 new jobs by 2045, with Vancouver and its UGA expected to capture more than half of all employment growth in Clark County. This includes 26,317 new jobs within city limits and 19,253 in the adjacent UGA. Much of this growth will rely on preserving and activating the city's industrial lands—which comprise over 2,400 net buildable acres, or 62 percent of the county's industrial land capacity—and ensuring it remains accessible to employers offering living-wage jobs.

The City must take an active role in shaping a business environment that supports startups and entrepreneurs through policies like leveraging City-owned land for affordable commercial space and streamlining permitting processes. Job-creating businesses must also have access to multimodal freight corridors and modern port infrastructure, particularly in sectors that depend on the efficient movement of goods. Vancouver's strategic location—at the nexus of I-5, I-205, multiple national rail lines, and deep water ports make it a prime hub for production based industries.

Supporting local job growth also means investing in place-based development and flexible spaces that can respond to the evolving needs of businesses. Policies under EO-2 reinforce these strategies, from conserving employment lands and leveraging public infrastructure to optimize freight mobility. The City will measure its progress through the total number of jobs created, business retention and attraction data, and the number of new small businesses that remain in operation beyond their first two years—all of which serve as indicators of a thriving, resilient and inclusive economy.

Supporting Policy	Description	No.	Related Goals
Affordable Commercial Space	Use City-controlled real estate to provide affordable commercial leasing opportunities for small and emerging businesses.	10	EO-4, EI-1, EO-2
Conserve Lands Providing Employment	Conserve and invest in industrial lands and other areas that provide employment opportunities and family-wage jobs.	36	LU-2, EO-2
Employment Centers	Direct new employment growth into Employment Centers with close proximity to housing, commercial activities, public services, employment, and amenities.	47	LU-1, EO-2
Enhance Port Access and Multimodal Freight Solutions	Improve infrastructure and connectivity to and from the Port of Vancouver to streamline freight operations.	50	LU-2, TM-3, EO-2
Facilitate Job-creating Business Growth and Investment	Support businesses that create high-quality jobs by reducing barriers to growth, streamlining development processes, and ensuring access to necessary resources and infrastructure.	59	EO-2, EO-4, CE-4
Optimize Freight Corridors	Designate and enhance freight corridors to facilitate efficient movement of goods and reduce congestion.	98	LU-2, TM-3, EO-2
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the city's identity, economy, history, and future.	104	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Vancouver as an Innovation Hub	Position Vancouver as a center for innovation, technology and entrepreneurship through public investment and attracting entrepreneurial talent.	159	CE-4, EO-2

Goal: EO-3 Circular and Sustainable Economy

Vancouver's economy is sustainable, circular and supports climate action and resiliency. City investments in economic development promote holistic cycles of consumption and production, prioritize renewable resources, and support industries that advance environmental health and economic stability.

A sustainable and resilient economy is one that not only grows—but does so in alignment with climate goals. This idea reflects Vancouver's commitment to building an economy that reduces waste, supports local supply chains, and prioritizes industries that regenerate rather than deplete natural resources. As Vancouver prepares for over 43,200 new housing units and new commercial development to support that growth by 2045, the opportunity to scale circular practices—such as sourcing materials locally, reducing embodied carbon in construction, and expanding access to recycled and reclaimed inputs—has never been greater. This transition requires rethinking the full economic cycle: from where materials come from, to how goods are produced, consumed, reused, and ultimately reintegrated into the economy.

The city's evolving employment landscape also underscores the need for economic resilience. Vancouver's workforce is still concentrated in service sectors vulnerable to climate disruptions, but growth is emerging in clean technology, life sciences, and green construction. At the same time, 17 percent of workers are now remote—many earning above $65,000 a year—highlighting a shift in where and how people work, and an opportunity to localize more jobs that support community self-sufficiency. A more circular economy will reduce vehicle miles traveled, create durable green jobs, and decrease waste at every stage of the supply chain. Collectively, the policies under EO-3 ensure that economic development in Vancouver strengthens both environmental health and long-term economic stability.

Supporting Policy	Description	No.	Related Goals
Build a Resilient Economy	Encourage business growth, retention and expansion, with an emphasis on family-wage jobs and foster resilience within Vancouver's economy.	**24**	LU-2 CL-1, EO-3
Embodied Carbon	Prioritize local source materials, low-carbon materials and material reuse in City-led infrastructure and redevelopment projects.	**44**	CL-3, EO-3
Native Landscapes	Incorporate native plantings, food forests and agroforestry into parks and public spaces to support food security, ecological health and cultural knowledge sharing.	**94**	PR-3, CL-2, EO-3
Reduce Food Waste	Reduce food waste in the community, and ensure surplus food supply is directed to underserved communities without fresh food access.	**114**	CL-3, EO-3
Reduce Solid Waste	Increase waste diversion rates through a system that minimizes landfill reliance, reduces GHG emissions, prioritizes composting, and encourages resource recovery.	**117**	CL-1, CL-3, CL-4, EO-3, PFS-1
Support Local Business Transition to the Green Economy	Support local businesses in adapting to the localized impacts of climate change and reduce their overall carbon impact.	**146**	EO-3, LU-3
Support Locally Made Products and Art	Support and elevate Vancouver's local makers, artisans, and creative production sectors by promoting the use of locally sourced and recycled materials, strengthening small-scale manufacturing, and advancing a circular economy that contributes to community pride and place-based identity.	**147**	CE-5, EO-3, PR-4

Goal: EO-4 Place-based Economic Development

Vancouver strengthens a sense of place by directing investment, policy and partnerships to key activity hubs that support local businesses, community-serving amenities, job access, and shared prosperity.

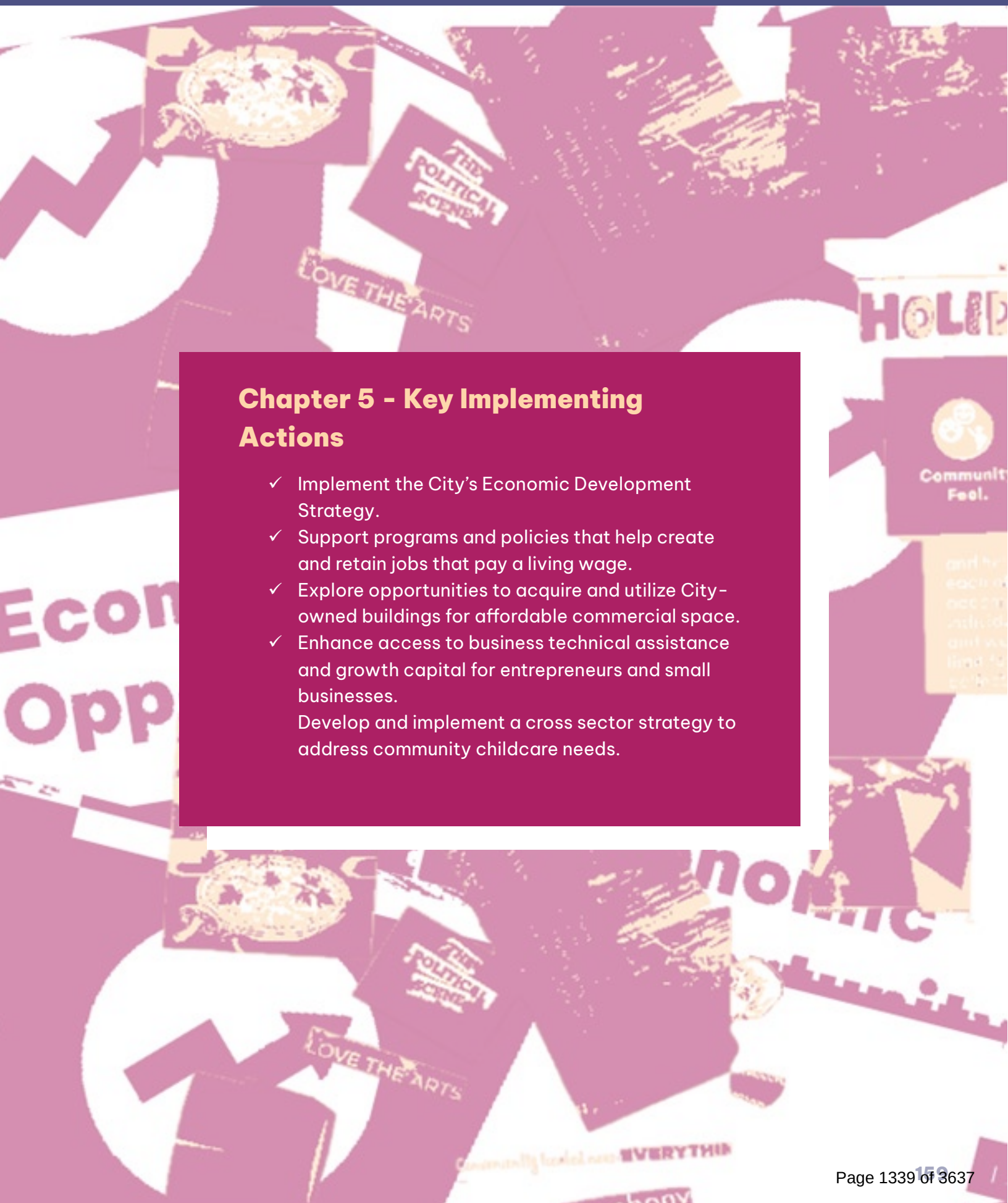
A strong and inclusive economy is one that is rooted in place—where economic activity strengthens neighborhoods, reflects community identity, and creates opportunity close to where people live. This approach reflects Vancouver's commitment to directing investment, policy, and partnerships toward key hubs of activity that support local businesses, community-serving amenities, job access, and shared prosperity. Rather than relying solely on citywide growth strategies, place-based economic development focuses on the specific conditions, assets, and needs of different neighborhoods, recognizing that economic opportunity is shaped by geography, access, and the built environment.

As Vancouver continues to grow and evolve, the opportunity to reinforce neighborhood-scale economic hubs has never been greater. New housing development, infrastructure investments, and public realm improvements will reshape how people live, work, and access services across the city. Targeted investment in neighborhood business districts, employment centers, and mixed-use hubs—particularly in historically underinvested corridors—allows the City to strengthen local entrepreneurship, expand access to daily goods and services, and support small businesses that anchor community life. These areas serve not only as centers of economic activity, but also as social and cultural gathering places that contribute to neighborhood vitality and identity.

Vancouver's economic landscape also underscores the importance of localizing opportunity. Small and emerging businesses—particularly those owned by historically marginalized entrepreneurs—often face barriers related to rising commercial rents, permitting complexity, and limited access to capital. Place-based strategies allow the City to respond to these challenges by aligning land use, infrastructure, public space, and economic tools in ways that support business stability and prevent displacement as neighborhoods change. The policies under EO-4 ensure that economic development in Vancouver strengthens a sense of place while advancing equitable access to opportunity and shared prosperity across the city.

Supporting Policy	Description	No.	Related Goals
Affordable Commercial Space	Use City-controlled real estate to provide affordable commercial leasing opportunities for small and emerging businesses.	10	EO-4, EI-1, EO-2
Align Place-based Investment with the Growth Concept	Align City investments, incentives and programs to reinforce key centers identified in the growth concept as points for local economic development efforts and community investment.	15	CE-5, EO-4
City-led Redevelopment	Invest in current and future City-led redevelopment efforts through property acquisition, community engagement, master planning, parks and infrastructure funding, and investment in affordable housing. Priority areas for City-led redevelopment include existing projects at Waterfront Gateway, the Heights, and Fourth Plain Ops Center; future projects at Library Square; and historically compatible investments at City-owned properties inside the Historic Reserve.	27	LU-1, EO-4
City-supported Redevelopment	Participate in future public-private partnerships to promote redevelopment on privately owned land in key areas around the city, including Downtown, Uptown Village, West Downtown, Van Mall, Columbia Business Center, Evergreen and Grand, Mill Plain Corridor, 136th near Firstenburg, and Clark College, as well as other strategic locations around the city.	28	LU-1, EO-4
Facilitate Job-creating Business Growth and Investment	Support businesses that create high-quality jobs by reducing barriers to growth, streamlining development processes, and ensuring access to necessary resources and infrastructure.	59	EO-2, EO-4, CE-4

Supporting Policy	Description	No.	Related Goals
Strengthen Neighborhood Business Districts	Ensure neighborhood business districts are safe, vibrant, and accessible hubs of economic activity through strategic public and private investment, and reflect a sense of community identity.	**141**	EO-4, CE-5
Subarea Plans	Develop subarea plans for centers identified in the Growth Concept and areas called out in the Equitable Development Strategy to facilitate the development of integrated residential, commercial, employment and community uses, including in the following areas: Central Mill Plain (the Heights to PeaceHealth), 136th/137th Corridor, Vancouver Mall, St. Johns/St. James couplet, Fourth Plain Corridor, Downtown, Upper Main Street and Walnut Grove, 164th Corridor, and 192nd Corridor.	**142**	LU-1, EO-4
Support Small Businesses	Foster inclusive economic growth through education and resources that support small business owners, entrepreneurs and members of historically excluded and underserved communities.	**150**	EO-4, EO-1, EI-1



Chapter 5 - Key Implementing Actions

- ✓ Implement the City's Economic Development Strategy.
- ✓ Support programs and policies that help create and retain jobs that pay a living wage.
- ✓ Explore opportunities to acquire and utilize City-owned buildings for affordable commercial space.
- ✓ Enhance access to business technical assistance and growth capital for entrepreneurs and small businesses.
  Develop and implement a cross sector strategy to address community childcare needs.

Climate and Environment



6

OUR VANCOUVER

Introduction

Climate change is no longer a distant threat in Vancouver. Rising temperatures, wildfire smoke, and more frequent flooding events are impacting the health of our residents, the resilience of our infrastructure, and the vitality of our natural systems. Without significant interventions on a national or global scale to reduce carbon emission, these impacts are expected to worsen over the next twenty years. In the face of a rapidly changing environment, the City can play a key role in mitigating some of these impacts and increasing overall community resilience.

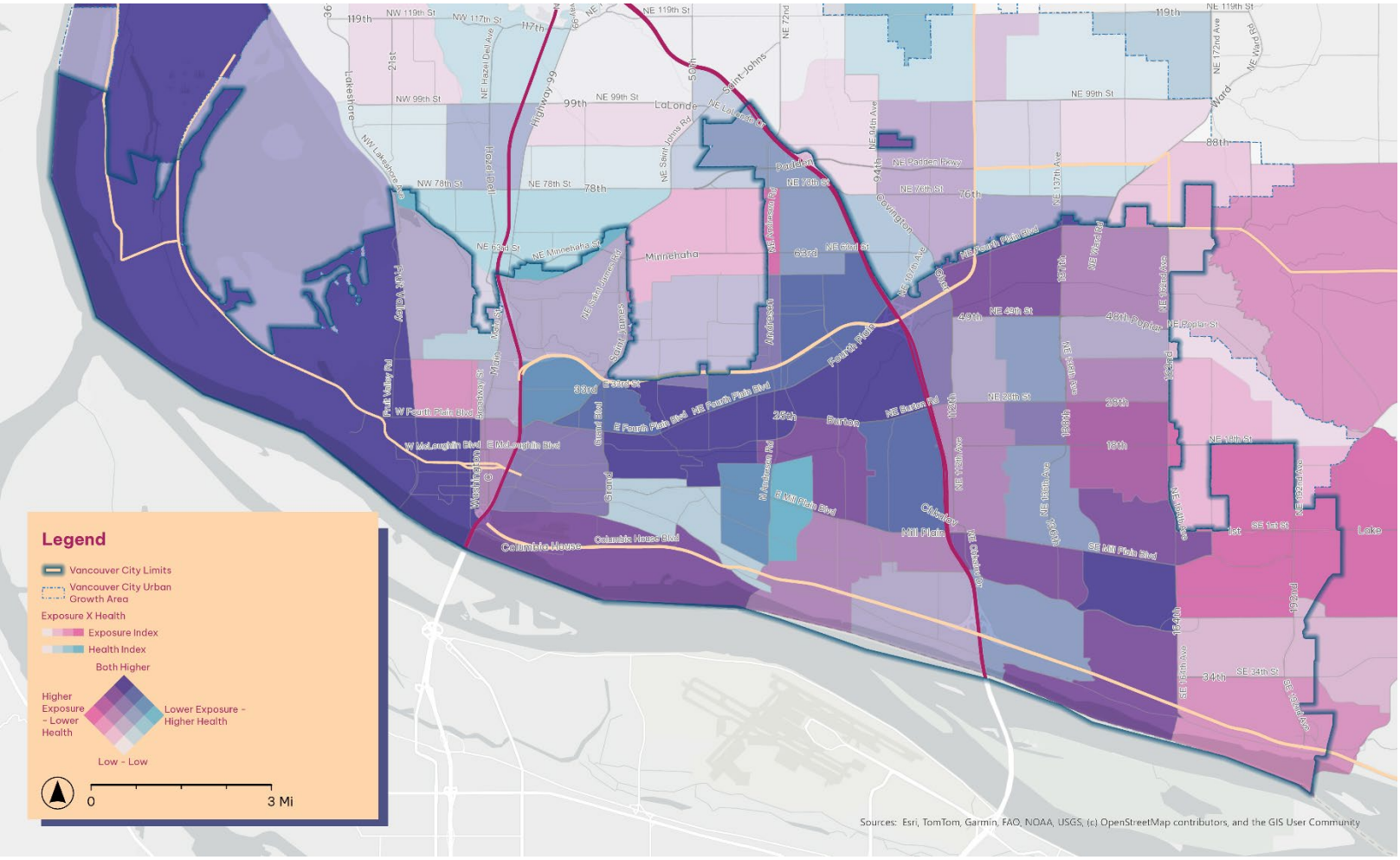


Downtown Vancouver, Washington, during the 2020 Wildfire Season

For decades, Vancouver's land use patterns have shaped the GHG emissions profile the city faces today. Much of Vancouver's post-war growth occurred through low-density residential development separated from jobs, services, and daily needs, resulting in an urban form where most households rely on driving for nearly every trip. This pattern has contributed to transportation becoming the city's largest source of emissions, consistent with regional and statewide trends. At the same time, older housing stock and commercial buildings—many built long before modern energy codes—continue to generate substantial emissions through inefficient heating, cooling, and ventilation systems. Historic industrial activity, the concentration of commercial corridors along auto-oriented arterials, and development patterns that expanded outward rather than upward have further locked in a built environment that consumes more energy and produces more air pollution than compact, mixed-use neighborhoods. These patterns have also produced uneven climate burdens: neighborhoods with lower tree canopy, more impervious surface, and older buildings—often the same communities facing socioeconomic and health disparities—experience both higher emissions exposure and greater

climate vulnerability, reinforcing many of the inequities identified in Appendix H, Climate Vulnerability Assessment, and Appendix I, Health Impact Assessment.

Figure 15. Climate Exposure versus Health Impact Score



The map above shows areas of the city that have both high exposure to climate risks (ex: extreme heat, flooding, smoke inhalation), and high instances of health conditions (such as asthma, diabetes, heart disease, or poor physical / mental health). Areas in purple have the highest instances, while areas in white have the lowest.

Due to a variety of socioeconomic factors and structural inequities, not all population groups in our community experience the impacts of climate change equally, and are less able to adapt and respond to those impacts when faced with them. Areas with the highest combined climate exposure, health sensitivity, and equity disparities are concentrated along the Fourth Plain Corridor (Maplewood, Meadow Homes, and Bagley Downs), Fruit Valley, central Vancouver south of State Route 500, and southeast Vancouver. These neighborhoods include higher proportions of people of color, low-income households, renter households, adults without a four-year degree, households with limited English proficiency, and persons with disabilities—all of which are identified as



Vision: Climate and Environment

We envision a future where there is balance between the built and natural environment, with resilient and thriving communities that are well prepared to adapt to the impacts of climate change. We commit to expanding green spaces and the ecosystems they host, building sustainable infrastructure, combating heat islands, and providing every community member with multimodal transportation options that reduce GHG emissions. We will invest in projects and initiatives that support those most impacted by climate change and engage all community members in finding solutions. We will prioritize the development of infrastructure and community spaces that are ready to function during times of disaster and create places where people continue to be able to live, work and play as climate changes.

indicators of reduced adaptive capacity in the City's Equity Index. Additionally, these populations tend to overlap with areas of the city where residents experience greater health risks, such as asthma, chronic obstructive pulmonary disease, diabetes, heart disease, poor physical health, and poor mental health.

As Vancouver grows, there are also opportunities to place an intentional focus on developing a built environment that supports increased health outcomes. Policy efforts to encourage physical activity, support food access, bolster community connections, mitigate health hazards, and support housing access and financial security that are outlined in this chapter can improve well-being for current and

future residents, particularly those with the greatest health disparities. Vancouver must also grow in ways that make it easier for residents to walk, bike, roll, or take public transit to their daily destinations, instead of relying primarily on single-occupancy vehicles. Achieving this will require advancing many of the strategies outlined in this plan, including creating more compact land use patterns, expanding diverse housing options, improving walking and cycling infrastructure, and encouraging a thoughtful mix of land uses to lower communitywide GHG emissions. This chapter establishes a coordinated approach to reducing GHG emissions, decreasing per-capita vehicle miles traveled, and preparing for the local impacts of climate change. It is grounded in the findings of the Climate Vulnerability Assessment (Appendix H) and Health Impact Assessment (Appendix I), which together provide the technical basis for understanding current and future climate hazards, who is most affected, and which assets and systems face the greatest risks.

Climate Hazards

Vancouver's approach to climate resilience recognizes that climate change impacts are not experienced evenly across the city. The effects of extreme heat, heavy rainfall, drought, and wildfire smoke intersect with existing inequities in health, housing and infrastructure. Climate modeling suggests that hazards will become more intense and more frequent by 2050.



Warming and Extreme Heat: The annual number of extremely hot days and warm nights in the Northwest has been above the long-term average over the past decade, and the annual number of extremely cold nights over the same period has been below the long-term average. Future warming in the region is expected to exacerbate regional heatwave intensities. It is particularly magnified on impervious areas in urban areas like Vancouver.

- **6°F hotter** average summer maximum temperature by 2050
- **+39 hot days** (over 90°F humidex/ heat + humidity) by 2050



Extreme Precipitation Events: The frequency and intensity of extreme precipitation events are projected to increase across the region. A greater number of strong atmospheric events and fewer moderate and weak events are projected to occur and are projected to reach farther inland. In Vancouver, major flooding along rivers and streams is less likely due to flood control structures and greenways but there is a risk along the port and other areas that are low lying, and there is a risk of urban flooding elsewhere.

- **13% more total precipitation** in a 2-year storm by 2050
- **14% more total precipitation** in a 25-year storm by 2050



Flooding and Infrastructure: Riverine flooding, as well as localized urban flooding, is a growing concern in Vancouver due to aging stormwater infrastructure, particularly in older neighborhoods with combined sewer systems. These systems are increasingly overwhelmed by intense rainfall events, leading to surface flooding and sewer overflows.

- **More frequent high stream flows** (every 9 years for Burnt Bridge Creek

and every 21 years for Columbia River, instead of every 25 years) by 2050

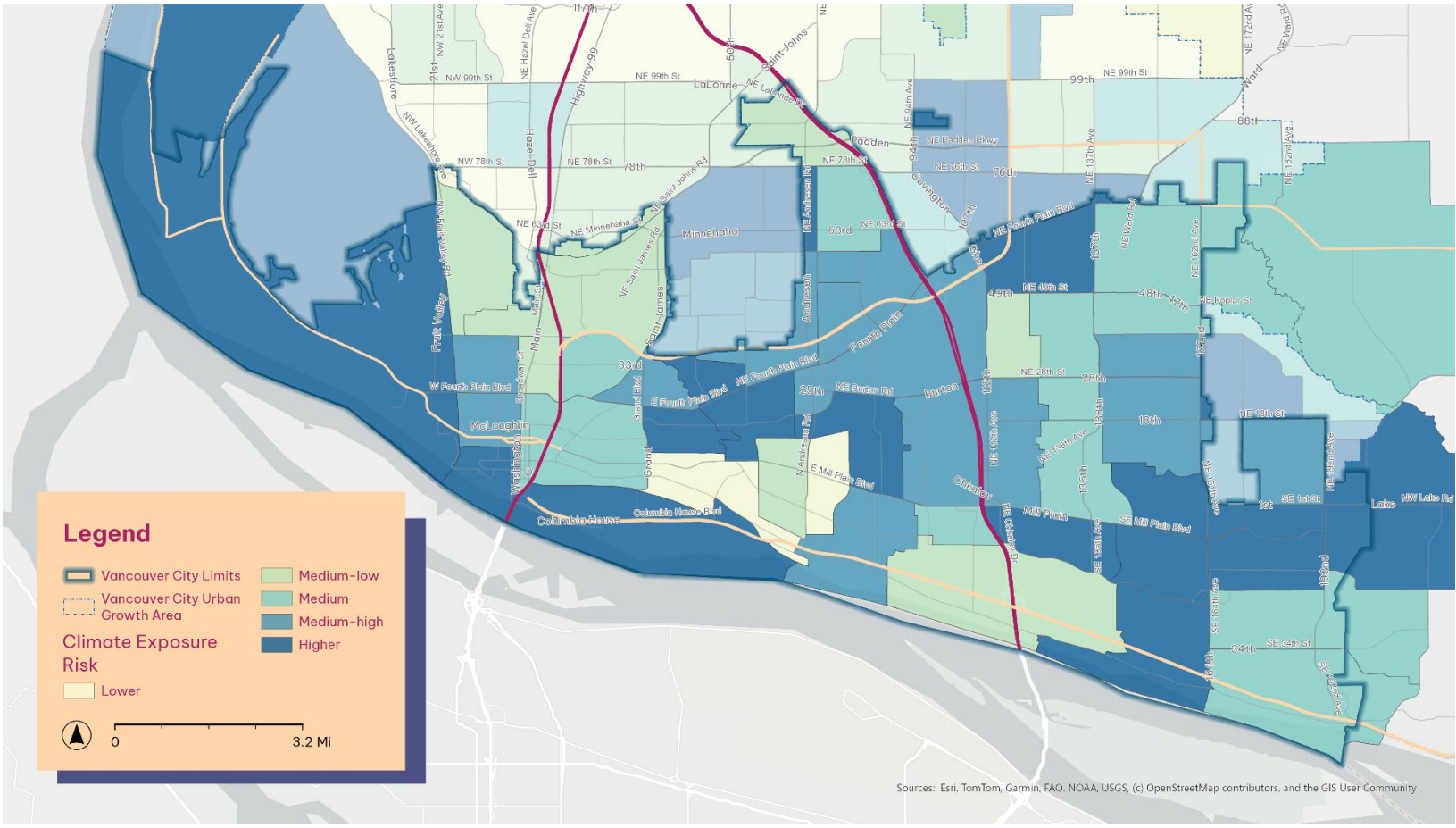
Decreasing Summer Precipitation and Increasing Drought: Summer precipitation is projected to decline. Observed lower stream flows in summer are expected to decrease. This could affect fish and other aquatic life in Vancouver's streams.

- **34% chance of lower than normal precipitation** (at or below 75% of normal) by 2050
- **Lower summer stream flows** (-5% for Burnt Bridge Creek and -21% on Columbia River) by 2050

Increasing Wildfire Likelihood and Smoke: An increase in wildfires in the Pacific Northwest could expose people in Vancouver and the broader region to more wildfire smoke. Increased wildfire smoke events are straining indoor air quality in public facilities. Many community centers and senior centers lack adequate heating, ventilation, and air conditioning systems or filtration, limiting their ability to serve as clean air shelters during smoke events.

- **37% greater** chance of climate and fuel conditions being conducive to wildfire
- **9 more** high fire danger days in Vancouver annually by 2050

Figure 16. Climate Exposure Index. *Source: BERK, 2025*

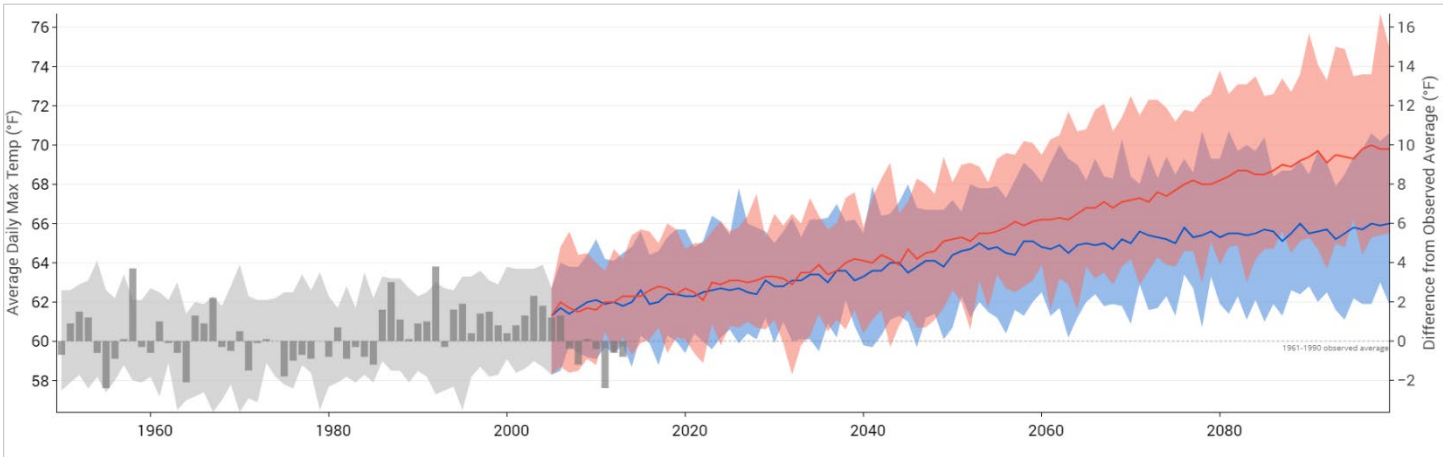


These hazards and their associated impacts vary substantially across Vancouver's neighborhoods. Some populations are at higher risk of climate impacts than others, based on location, health sensitivities, and access to resources. Areas at higher risk include those with more pavement and fewer trees, parts of the city prone to flooding and the 100-year floodplain, areas adjacent to industrial land uses and transportation emissions, and higher exposure to air quality impacts.

Conditions like asthma, chronic obstructive pulmonary disorder, diabetes, heart disease, hypertension, poor physical health, poor mental health, and lack of health insurance are linked to higher sensitivity.

- Bagley Downs, Maplewood, and Meadow Homes—along with the Fruit Valley and Mountain View neighborhoods—face the highest combined exposure to climate hazards and the lowest equity scores, reflecting greater social and economic vulnerability and fewer resources to adapt.
- East Vancouver, including areas near the Vancouver Mall and along SE Mill Plain Boulevard, experiences the city's greatest heat exposure, driven by low tree canopy (below 20 percent) and high impervious surface coverage.
- West Vancouver, especially around Vancouver Lake and the port, faces the highest flood and precipitation exposure due to low-lying topography and aging stormwater infrastructure. Central corridors around Burnt Bridge Creek also experience repeated surface flooding during intense rainfall events.
- Air quality and smoke exposure are more pronounced east of NW Fruit Valley Road, along State Route 14, and in southeast Vancouver, where prevailing winds concentrate wildfire smoke during regional fire events.

Figure 17. Average Daily Max. Temp. (°F) – Historic and Projected Trends – Clark County, Washington



Vancouver's climate risk is the product of both natural systems and long-standing development patterns that have concentrated people, infrastructure, and industry in areas more exposed to hazards. Historically, industrial land uses and transportation corridors were sited along Vancouver's western shoreline, adjacent to the Columbia River and Vancouver Lake. This legacy has left these neighborhoods with higher exposure to flooding, stormwater overflow, and poor air quality, while also limiting green space and tree canopy. The Climate Vulnerability Assessment (Appendix H)

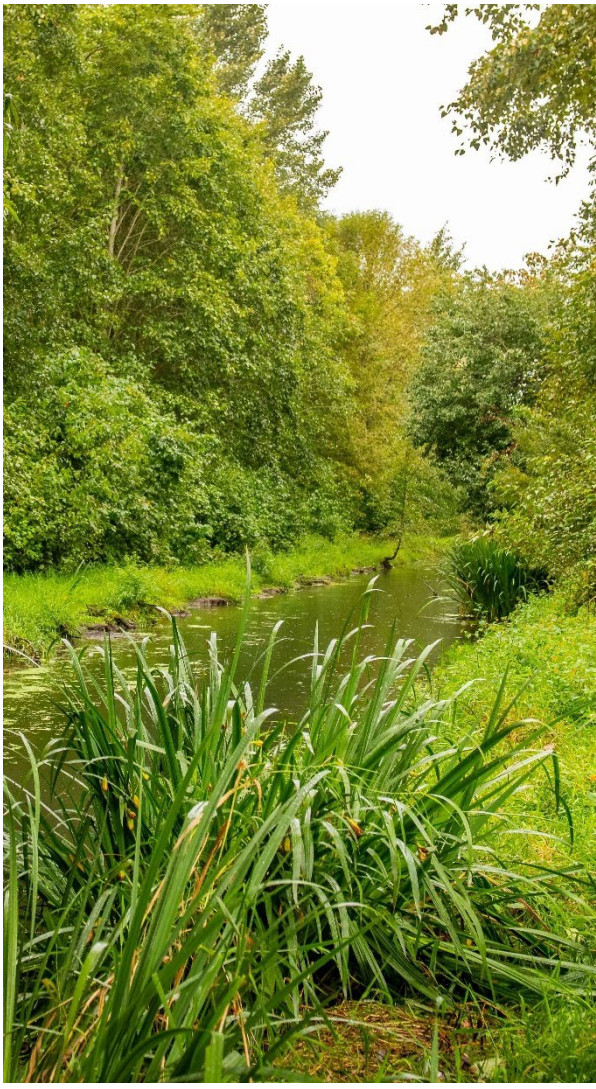
identifies these same areas as having some of the city's lowest adaptive capacity, due to older housing, lower incomes, and aging infrastructure.

Divesting from Fossil Fuels

The City of Vancouver has generally not supported proposed development involving intensive fossil fuel usage in recent years. The City actively opposed the Vancouver Energy oil transshipment terminal at the Port of Vancouver, which was ultimately denied by the Washington Energy Facility Site Evaluation Council (EFSEC) and the Governor in 2017. In 2022 the City enacted a yearlong moratorium on the construction of large scale distribution warehouses, which was then replaced with standards allowing the warehouses only on a more limited basis, with requirements that they include various climate friendly features and use restrictions. To meet community GHG reduction goals, the City will need to continue to limit new major investments in fossil fuel infrastructure, develop strategies to phase out existing infrastructure and utilize renewable sources in their place.

Critical Areas and Shorelines

Vancouver's Critical Areas Ordinance and Shoreline Master Program (SMP) are foundational tools for advancing climate resilience through land use planning and for implementing the City's Climate Vulnerability Assessment (CVA). These regulatory frameworks protect wetlands, floodplains, fish and wildlife habitat conservation areas, geologic hazard areas, and shoreline environments—natural systems that the CVA identifies as among the most sensitive to climate impacts such as increased flooding, extreme precipitation, rising temperatures, and degraded water quality. By regulating development intensity, requiring buffers, limiting disturbance, and prioritizing restoration in these areas, the CAO and SMP directly implement CVA strategies that call for protecting and enhancing natural infrastructure to reduce hazard exposure and improve adaptive capacity. The SMP, adopted under the Shoreline Management Act, further reinforces these outcomes by establishing shoreline designations, restoration priorities, and development standards that maintain ecological function while accommodating appropriate water-dependent uses and public access. Together, these frameworks play a critical role in protecting and restoring habitat connectivity, supporting biodiversity, and improving ecosystem resilience in the face of climate change. Integrating CVA findings into ongoing updates and implementation of the CAO and SMP ensures that land use decisions proactively reduce risks, protect wildlife, and strengthen the city's ability to adapt to future climate conditions.

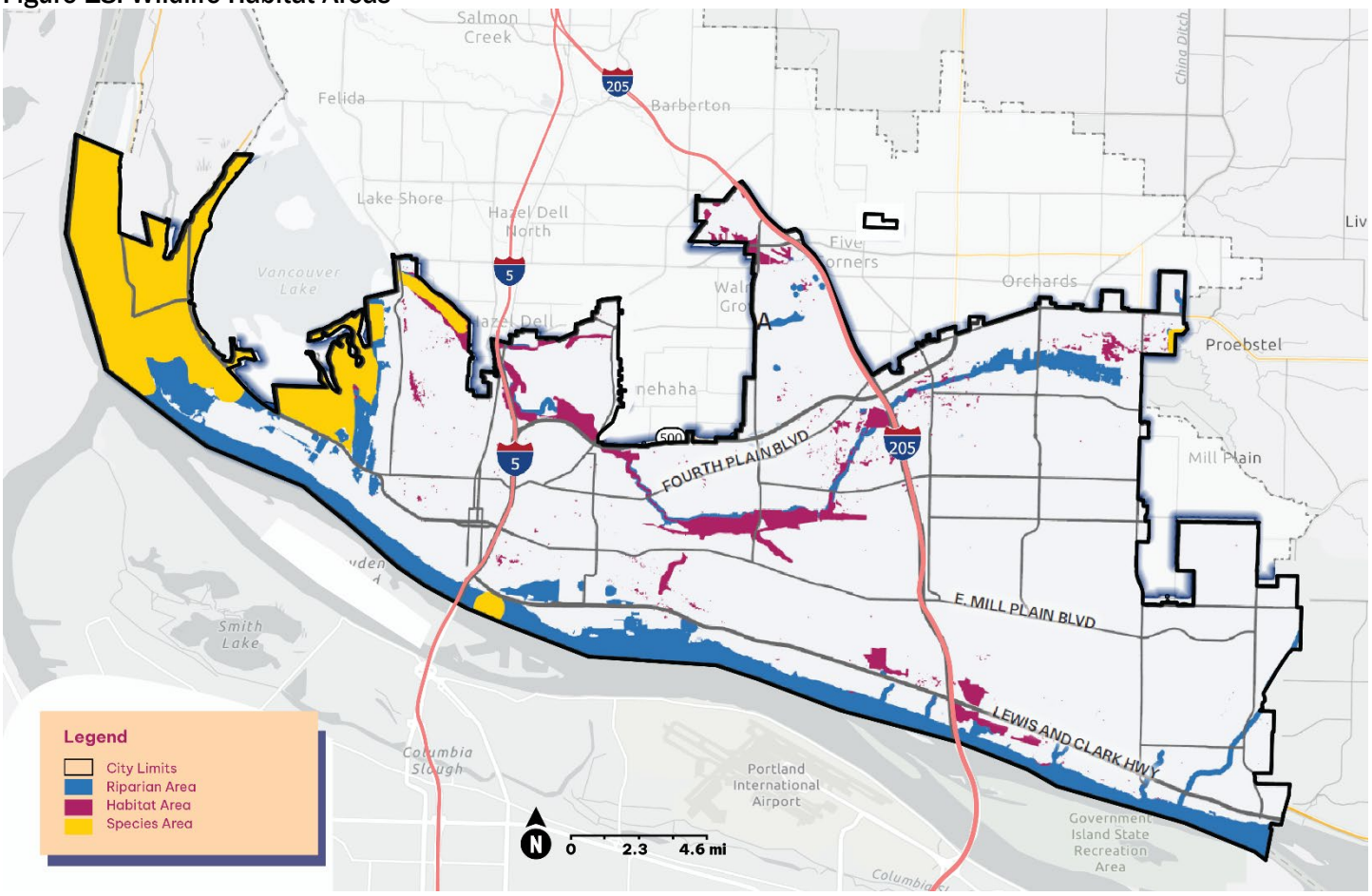


Burnt Bridge Creek is a key ecological asset that runs east to west through the City.

Wildlife Habitat

As Vancouver grows, the design of the built environment plays an increasingly important role in protecting wildlife, maintaining ecological function, and strengthening climate resilience. Approximately 14 percent of the city supports key riparian functions, wildlife habitat and vulnerable species, with key corridors along Burnt Bridge Creek, the Columbia River, and other water resources. These areas support biodiversity, provide habitat connectivity, and serve as critical migration routes, including for birds traveling along the Pacific Flyway and fish within the Lower Columbia River system. At the same time, urban development, climate stressors, and human activity introduce pressures that can degrade habitat quality, disrupt species behavior, and reduce ecosystem resilience. The City's Climate Vulnerability Assessment (CVA) identifies ecosystems, water resources, and habitat corridors as highly sensitive to climate impacts, including increased flooding, extreme precipitation, rising temperatures, and degraded water quality . It also highlights secondary stressors—such as invasive species, pest outbreaks, and habitat fragmentation—that can accelerate ecological decline if not proactively managed. In this context, climate resilience depends not only on protecting designated critical areas, but also on shaping how development interacts with the broader urban ecosystem. Integrating CVA findings into land use planning means designing development to minimize ecological disruption, enhance habitat function, and support species' ability to adapt to changing conditions.

Figure 18: Wildlife Habitat Areas



Protecting Habitat Through Land Use Planning

The City's Critical Areas Ordinance and Shoreline Master Program provide the regulatory foundation for protecting wetlands, fish and wildlife habitat conservation areas, and shoreline environments, consistent with state requirements and best available science. These frameworks require avoidance, minimization, and mitigation of impacts, and are guided by a "no net loss" standard for ecological functions. They also establish buffers, habitat protection measures, and restoration requirements that help maintain ecosystem services such as flood storage, water quality protection, and habitat connectivity.

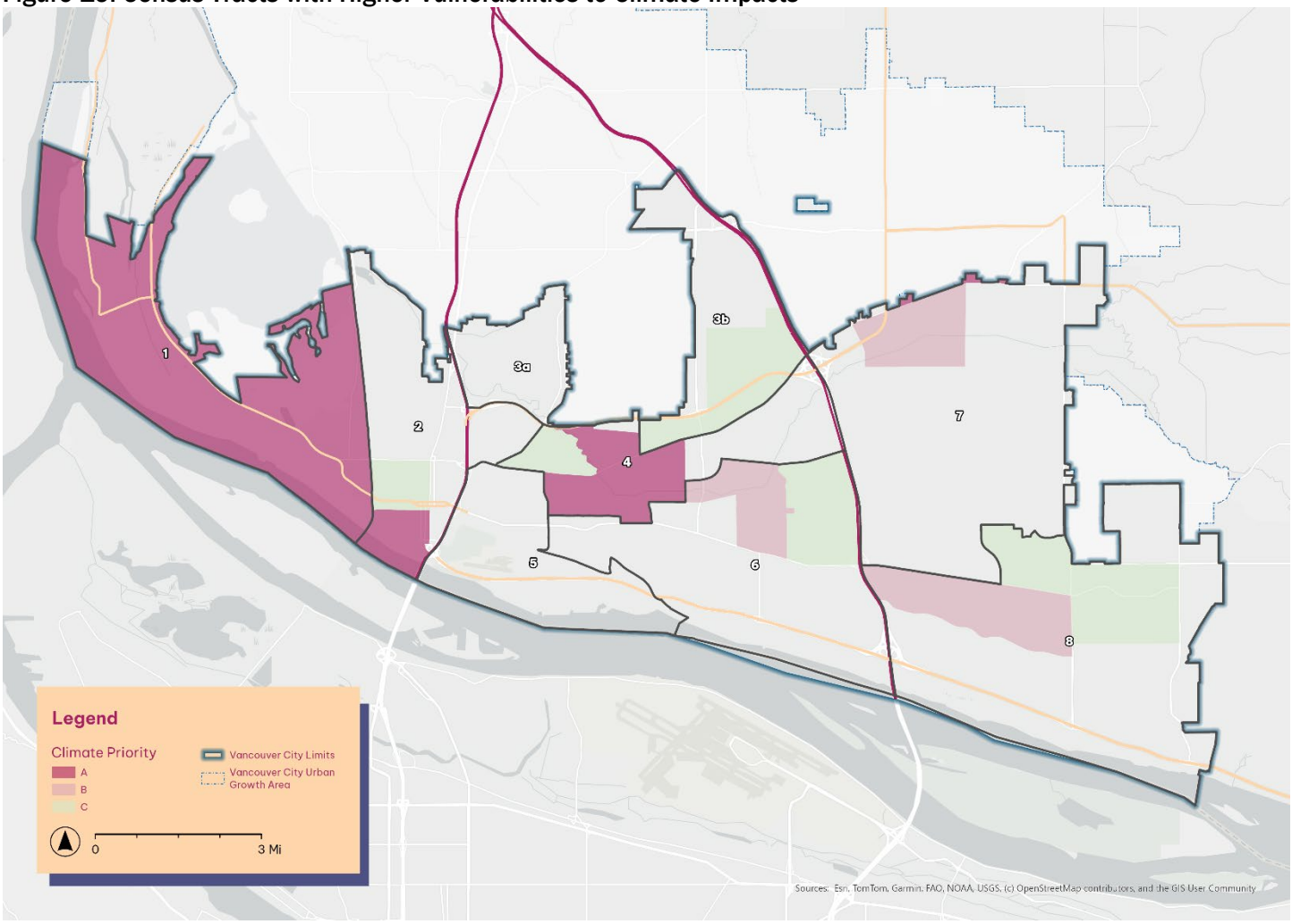
Given Vancouver's location along the Pacific Flyway, bird-safe design is particularly important. Excessive or poorly designed lighting can disrupt migration patterns, alter feeding and breeding behaviors, and increase mortality for birds and other species. To reduce these impacts, development should incorporate lighting strategies that minimize ecological disruption, including the use of downlighting, shielding, and lighting controls to reduce light spill and glare. Applying dark sky principles—such as limiting unnecessary nighttime illumination, using warmer color temperatures, and directing light only where needed—can help maintain more natural light cycles while also conserving energy. Building materials and design also play a critical role. Bird collisions with glass are a leading cause of mortality in urban areas, particularly near habitat corridors and water features. Mitigations are most effective when applied in areas near riparian corridors, habitat areas, and other ecological features identified in Figure 18. Protecting wildlife and natural systems is a core component of climate resilience. Healthy ecosystems provide essential services that reduce climate risks, including flood mitigation, urban cooling, water quality protection, and carbon sequestration.

While Vancouver does not currently designate protected habitat areas as a standalone classification, the functions of these areas are embedded within the City's critical areas and shoreline regulations. Riparian corridors, wetlands, and fish and wildlife habitat conservation areas function as core ecological assets that support biodiversity and climate resilience. As shown in Figure 18, these areas form an interconnected system across the city that should be preserved and enhanced over time. When opportunities and funding streams emerge in the future to acquire land for conservation purposes, these areas should be prioritized as greenway or natural area designations.

Invasive Species

Climate change is expected to increase the spread and intensity of invasive species and pests, which can outcompete native vegetation, degrade habitat, and alter ecosystem dynamics. Managing these risks is essential to maintaining biodiversity and ecological resilience. The City will need to support integrated pest management approaches that prioritize prevention, monitoring, and non-toxic or least-toxic control methods, while reducing reliance on pesticides that can harm pollinators, aquatic systems, and other wildlife. Coordination with regional partners, including the Clark County Mosquito Control District, will continue to be important to balance public health needs with ecological protection.

Figure 19. Census Tracts with Higher Vulnerabilities to Climate Impacts



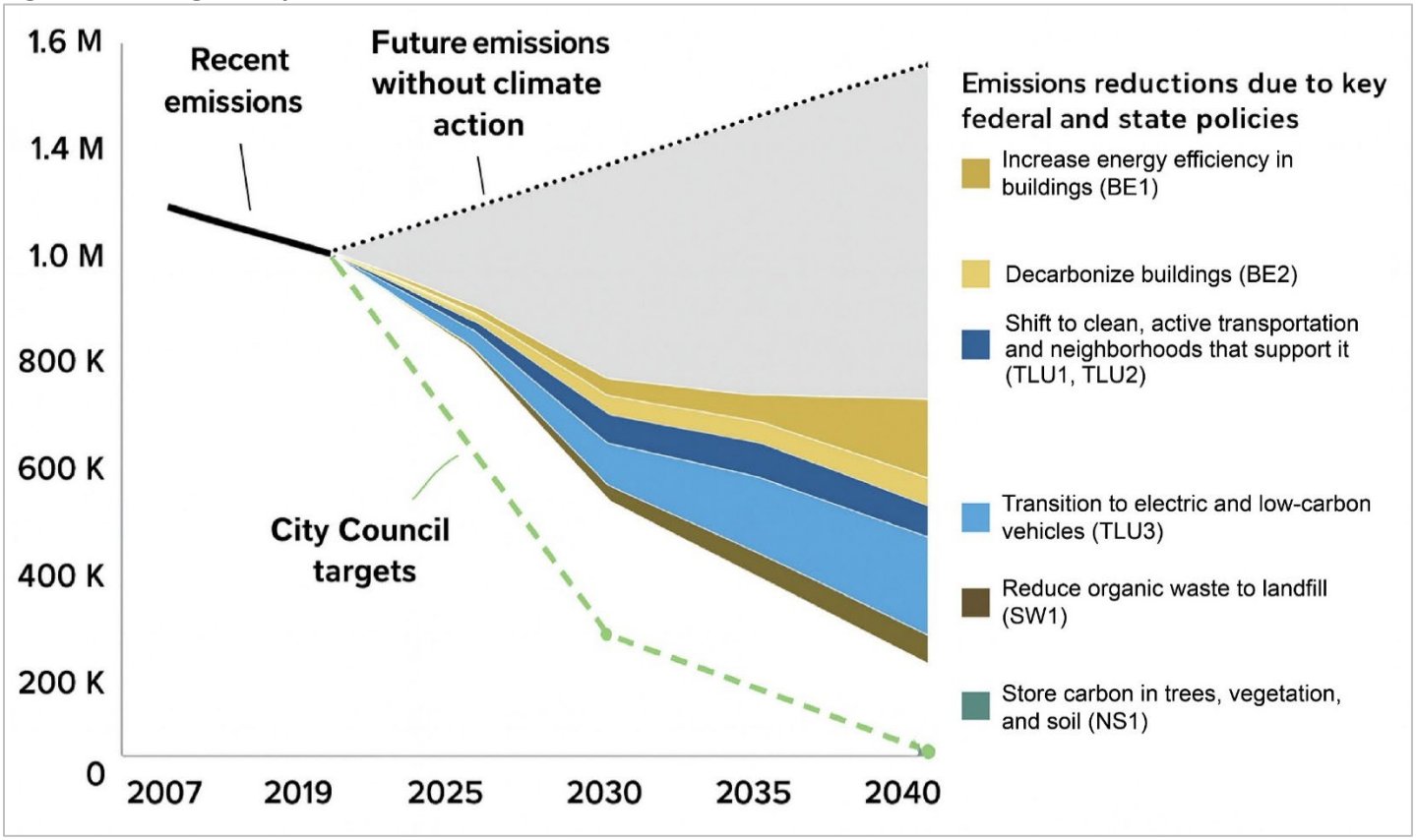
Greenhouse Gas Emissions

As climate impacts become more intense and frequent, it is increasingly urgent that Vancouver takes action to reduce GHG emissions, which are the driving force of climate change. Emissions in Vancouver mostly come from how we get around and how we heat, cool, and power buildings. Air travel, vehicles and equipment (like cars, delivery trucks, boats, and lawn mowers), electricity use, and natural gas use are major sources. Over time, residents on average have used less natural gas, driven fewer miles, and sent less waste to the landfill, even as our local economy has progressed.

The City's Climate Action Framework sets forth a goal that the city be carbon neutral by 2040. The Framework anticipates that with current technologies and existing policies, Vancouver could reach approximately 80 percent of its goal towards carbon neutrality; refer to Figure 20. With policy changes and technological innovations, Vancouver will strive to close the remaining gap. This element reflects the City's policy changes and actions to reach its goal through reducing emissions from City-owned buildings, operations, infrastructure, and municipal fleet; supporting transportation options; regulating land use; advancing technology and infrastructure; and partnering on regional economic development. The Greenhouse Gas Emissions Inventory (Appendix N) provides a more detailed accounting of community-wide and municipal emissions, establishing a baseline to

track progress toward the City's climate goals. The inventory identifies key emissions sources—particularly in transportation and buildings—and highlights areas where targeted action can have the greatest impact. This data-driven foundation informs climate policies and helps prioritize strategies to reduce emissions and improve community health and resilience.

Figure 20. Wedge Analysis – Climate Action Framework



Health and the Built Environment

Land use and urban design shape the health of our communities. Safe and accessible walking and biking routes, access to parks, proximity to grocery stores and other services, housing access, and financial security all affect people's well-being on a day-to-day basis. Exposure to poor air and water quality, noise, heat, and climate impacts can have negative effects. City policies that emphasize health benefits and minimize hazards can lead to better health outcomes for Vancouver residents. The City can support physical activity through parks and active transportation. Access to parks varies citywide: Fruit Valley, Rose Village, Fourth Plain Village, and some areas on the east side of Vancouver have less than 20 percent of the park acreage needed to meet the City's established level of service (LOS)[39]. As of 2024, only 2 percent of Vancouver workers walk to work, 0.5 percent bike to work, and 3 percent take public transit (and are likely to walk some amount in their commute), while the overwhelming majority (75 percent) drive alone to their jobs[40]. Many existing

[39] 2022-2031 Vancouver Parks, Recreation, and Cultural Services Comprehensive Plan
[40] Design Workshop (2024)

car trips are under 5 miles long. Improved pedestrian and bicycle safety and connectivity could make active transportation an option for more people. Land use planning that encourages mixed uses and more services near homes can also make it easier to walk and bike on a regular basis.

Health Facts

- **5.5%** workers who get some physical activity on their commute (walk, bike, or take transit)
- **16%** of households receive SNAP benefits
- **48%** students who receive free and reduced school lunch
- **30** estimated deaths per year from poor air quality exposure (PM2.5)
- **1 in 8** households living below the federal poverty level

Much of the Vancouver population has food access challenges. Sixteen percent receive Supplemental Nutrition Assistance Program (SNAP) support and 48 percent of public school students receive free and reduced school lunch[41]. Access to supermarkets varies citywide: some areas don't have any within a mile. Other food resources include food banks, community gardens, and local farmers markets. City efforts can help support access to food by facilitating the density and commercial space needed to support new stores, and by promoting community gardens and other food-related uses.

Access to other amenities also varies. There is generally lower access to services, in terms of quantity and variety, in Fruit Valley, Rose Village, and some areas west of I-205 and the east side of

Equity Lens

Some communities experience greater climate hazard and health disparities than others:

- Persons that are elderly may have more limited mobility or pre-existing health conditions, and children under five years old may have a harder time regulating temperature and may have underdeveloped immune systems.
- Low-income households may be more susceptible to illnesses and have limited resources to adapt or respond to climate change.
- Persons that speak English less than very well may have more difficulties during evacuation and difficulties accessing post-disaster funding.
- Households with lower incomes are more likely to lose more work hours due to weather.
- BIPOC populations are more likely to have new asthma diagnoses due to particulate air pollution.
- Areas with less tree canopy are exposed to more heat, and communities of color have less coverage in Vancouver.

[41] U.S. Census Bureau (2022) and Design Workshop (2024)

the city. Land use that supports a mix of uses and densities can encourage development that provides new services close to where people live. A range of health hazards also affect Vancouver residents. Vancouver is especially impacted by air pollution, with an estimated 30 deaths per year associated with PM 2.5 concentration[42]. Other threats like climate hazards and noise vary by location. City policies can help mitigate these hazards by influencing things like tree canopy cover, placement of growth, stormwater management, and other factors.

Housing and economic issues are also tied to health and well-being. Affordability and displacement are pressing issues in Vancouver, and many older units may have exposure to hazards like lead and asbestos. About one in eight households is living below the federal poverty level and average wages are especially insufficient for single parent households[43]. City policies to encourage housing affordability, safe and healthy housing, and a strong local economy can create opportunities for all Vancouver residents to thrive.

Tree Canopy

Tree canopy is one of the most effective and visible climate resilience strategies available to the City, providing a wide range of environmental, social, and economic benefits. Trees reduce urban heat island effects, improve air quality, manage stormwater, sequester carbon, and contribute to overall community health and livability. However, Vancouver's current canopy coverage—approximately 19 percent—is well below the level needed to maximize these benefits. The City's Urban Forestry Management Plan establishes a goal of achieving 28 percent canopy coverage by 2030, requiring a substantial increase in tree planting, preservation, and long-term maintenance efforts. Reaching this goal will require not only expanding the urban forest



Areas like Blandford Canyon (shown above) still have significant stands of trees. Trees provide greater ecological benefits and remain healthy when preserved in large stands. Vancouver's ability to achieve its Tree Canopy goals will depend on preserving these areas and ensuring new development does not significantly disrupt ecologic processes.

[42] Washington State Department of Ecology (2023)
[43] U.S. Census Bureau (2023), MIT (2025)

through coordinated planting initiatives and community partnerships, but also prioritizing the protection of existing mature trees through a "no net loss" framework and stronger enforcement of tree regulations. Just as importantly, tree canopy must be expanded equitably—today, canopy is unevenly distributed across the city, with neighborhoods with higher proportions of people of color and lower incomes have less tree plantings than more affluent neighborhoods. Achieving Vancouver's canopy goals will therefore require a targeted, data-driven approach that prioritizes planting and investment in underserved neighborhoods, aligns with broader climate and health equity goals, and ensures that the long-term benefits of the urban forest are shared across all communities.

Community Feedback

- Through Resilience Rising in May and June 2025, participants with Fourth Plain Forward, the Southwest Washington Equity Coalition, and Washington Conservation Action repeatedly raised issues of inequitable access to resources like air conditioning, clean air shelters, and public cooling infrastructure.
- Through engagement for the Climate Adaptation Strategy in 2023, physical elements that community members would like to see include water features, such as splash pads, urban gardens and fruit trees; more tree coverage; and community centers or public spaces for neighbors to connect with one another.
- Air, water, and noise pollution are major concerns, viewed as top issues affecting neighborhood health and tied to worries about traffic, industrial uses, and incompatible land uses.
- Strong desire to protect and expand natural assets, including preserving open space, preventing habitat loss, increasing tree canopy and shade, planting native species, and creating more community gardens and green spaces.
- Broad support for climate-friendly and sustainable development practices, such as concentrating growth near transit, improving energy efficiency, expanding solar, enhancing stormwater management, and balancing development with forest and agricultural land conservation.
- Community resilience is a priority, with interest in cooling features, resilient infrastructure, emergency preparedness, and using public buildings, transit centers, and natural systems (like trees) as resilience assets.
- Access to essential health, food, and social services is critical, including medical facilities, fresh food, culturally and physically accessible services, and resources for vulnerable populations.
- People value clean, quiet, nature-connected neighborhoods, emphasizing the importance of mitigating noise, reducing pollution, improving compatibility between land uses, and ensuring development does not degrade environmental quality.

Goal: CL-1 Resilience and Climate Adaptation

Vancouver is a resilient and sustainable city that is prepared to mitigate and adapt to the localized impacts of climate change, including sea level rise, landslides, flooding, more intense winter storm conditions, drought, heat, smoke, and wildfire.

Vancouver's climate response depends on preparing for and adapting to the localized impacts of climate change that are already unfolding across the region. Rising temperatures, more frequent wildfire smoke events, intense rainfall, flooding, and prolonged drought conditions are affecting residents in every neighborhood—and disproportionately harming frontline communities with fewer resources to cope. Goal CL-1 establishes a coordinated, community-centered approach to safeguarding public health, strengthening infrastructure, and ensuring that all residents have equitable access to the protections they need as climate conditions intensify. This goal embraces the reality that resilience is built through both physical investments and strong social networks, and it positions Vancouver to adapt proactively rather than reactively.

At the core of this approach is robust disaster recovery and emergency response, which ensures that residents—particularly older adults, people with disabilities, unhoused residents, low-income households, and linguistically isolated communities—can access emergency information, cooling or clean-air shelters, medical care, and recovery assistance during climate-related events. Supportive policies include building trust with community-based organizations, cultural groups, and neighborhood networks, acknowledging that these relationships are essential for effective emergency communication and resource distribution.

Vancouver's Climate Vulnerability Assessment (Appendix H) shows that heat exposure is most severe in neighborhoods with limited tree canopy, high impervious surfaces, and existing social and health inequities. Policies under this goal commit the City to cooling these neighborhoods through strategic shade structures, expanded green space, and climate-appropriate tree canopy—especially in Equity Priority Neighborhoods. These nature-based solutions not only cool streets and homes but also improve air quality, reduce stormwater runoff, and create healthier public environments.

The approach also proposed integrating climate-resilient infrastructure and buildings into both public projects and private development, including green stormwater systems, drought-tolerant landscaping, cool roofs, and building upgrades that increase energy efficiency, improve indoor air quality, and reduce emissions. Expanding solar access for low-income renters and homeowners supports both equity and long-term energy resilience. Policies that advance solid waste reduction, composting, and resource recovery further reduce emissions and environmental impacts.

Supporting Policy	Description	No.	Related Goals
Adapt Infrastructure to Climate Change	Retrofit existing infrastructure, parks and natural spaces, and construct new facilities to adapt to the localized impacts that will occur in the community due to climate change.	8	CL-1, PFS-1, PFS-3
Build a Resilient Economy	Encourage business growth, retention, and expansion, with an emphasis on family-wage jobs and foster resilience within Vancouver's economy.	24	LU-2 CL-1, EO-3
Climate Resilient Spaces	Incorporate elements of climate resiliency into new public spaces, buildings, and infrastructure.	29	CL-1, CE-1, PR-1, PFS-3, LU-3
Conserve Water Resources	Encourage water-efficient technologies and practices to reduce consumption and ensure sustainable water availability amid climate change and growing demand.	37	CL-1, CL-4, PFS-1
Disaster Recovery and Emergency Response	Develop plans and resources to ensure effective emergency response and recovery efforts in the event of natural disasters, climate-related hazards, and social disruptions.	43	CE-3, CL-1, PFS-3

Supporting Policy	Description	No.	Related Goals
Energy Efficient and Climate Resilient Buildings	Ensure that buildings contribute to the City's GHG reduction goals and protect occupants from pollution, extreme weather and other climate hazards.	48	CL-1, CL-3
Equity and Climate Data	Incorporate the City's Equity Index, Displacement Risk Assessment tool, and climate vulnerability assessment in public investment and infrastructure improvement decisions.	54	EI-1, PFS-1, CL-1
Historic and Culturally Significant Resources	Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, and rehabilitation of historic and architecturally significant structures.	66	CE-5, CL-1, CL-2, PR-4
Climate Resilient Development	Integrate climate resiliency best practices into the City's review of new development.	72	CL-1, CL-2, PFS-1
Pilot Projects	Encourage the use of short-term pilot projects for park, transportation, and general infrastructure improvements before making long-term investments to foster innovation, test feasibility, and increase community buy-in.	102	CE-4, PR-2, TM-2, CL-1
Reduce Climate Impact Exposure to Vancouver's Neighborhoods	Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.	111	CL-1

Supporting Policy	Description	No.	Related Goals
Reduce Heat Island Effect	Minimize impacts of the urban heat island effect, reduce geographic temperature disparities, and safeguard vulnerable populations from the adverse effects of extreme heat.	115	CL-1, CL-2, CL-4
Reduce Solid Waste	Increase waste diversion rates through a system that minimizes landfill reliance, reduces GHG emissions, prioritizes composting and encourages resource recovery.	117	CL-1, CL-3, CL-4, EO-3, PFS-1
Redundancy in Infrastructure	Design, construct and maintain capital infrastructure systems with resiliency and redundancy to minimize the risk of system failure during natural hazards, climate-related events, or other disruptions. Prioritize investments that diversify supply sources, strengthen backup systems, and enhance adaptive capacity so essential services can be maintained or restored quickly in the event of a failure.	119	PFS-3, CL-1
Solar Access	Expand residential, commercial and industrial access to solar power to meet energy needs.	134	CL-1, CL-3
Stormwater Management	Improve water quality, protect watersheds and reduce flood risks by promoting groundwater infiltration, reducing runoff, and advancing effective stormwater best management practices (BMPs).	136	CL-1, PFS-1
Strategic Reuse of Excess Right-of-Way	Analyze suitability of excess and unneeded ROW for adding tree canopy, native planting, nature spaces, and stormwater management systems.	137	CL-1, CL-2, LU-3, CL-4, PR-2

Goal: CL-2 Increase Biodiversity and Enhance Natural Systems

Vancouver has thriving ecosystems, builds green infrastructure and preserves natural spaces that enhance air quality, provide natural cooling, sequester carbon, and beautify neighborhoods, enriching residents' quality of life and fostering rich and diverse plant and animal life.

Vancouver's natural systems—its forests, waterways, wetlands, riparian corridors, and open spaces—are essential to the city's long-term resilience, ecological health, and quality of life. This goal strengthens these systems by proposing solutions to restore habitat, expand green infrastructure, improve tree canopy, and protect the ecological functions that cool neighborhoods, filter air and water, sequester carbon, and sustain a diversity of plant and animal life. As climate impacts intensify, these natural assets also serve as vital buffers against heat, flooding, drought, and poor air quality.

CL-2 emphasizes protecting and restoring the city's critical areas and shorelines, ensuring no net loss of ecological function and advancing conservation design principles that support salmon-bearing streams, wetlands, and riparian habitats. The goal further commits to restoring degraded natural areas, improving habitat quality, and identifying climate refugia—places with naturally cooler conditions, stable hydrology, or intact vegetation that can sustain species under climate stress. These strategies help maintain biodiversity while preserving the ecological processes that safeguard water quality, reduce erosion, and support community well-being.

Expanding and equitably distributing tree canopy are cornerstones of this goal. Increasing canopy to 28 percent—and prioritizing low-canopy, equity priority neighborhoods—provides natural cooling, reduces heat island effects, improves air quality, and enhances stormwater infiltration. Integrated climate-resilient infrastructure, such as green streets, bioswales, and permeable surfaces, complements this work by managing runoff, reducing localized flooding, and bringing greenery into urban areas where it is most needed.

CL-2 also strengthens habitat connectivity, linking parks, natural areas, and open spaces through linear greenways and active transportation corridors. These networks support wildlife movement, expand pollinator habitat, and create shaded, walkable routes for residents. Complementary policies

promote native landscapes, food forests, and agroforestry, which enhance soil health, support food security, and foster cultural knowledge-sharing. Conservation of environmentally sensitive lands ensures long-term protection for ecologically significant areas.

Another key component of CL-2 is building meaningful partnerships with Tribal nations and Indigenous land stewards, whose knowledge and cultural priorities deepen ecological understanding and inform stewardship practices. The goal also aligns closely with efforts to protect historic, cultural, and archeological resources, recognizing the intertwined nature of cultural heritage and ecological resilience.

Supporting Policy	Description	No.	Related Goals
Conserve Land For Open Space and Environmental Preservation	Acquire environmentally sensitive land with ecological benefits for the purpose of conservation.	**35**	PR-2, CL-2
Engage with Tribal Community Members	Foster meaningful partnerships with Tribal communities and land stewards, integrating their knowledge, priorities, and cultural perspectives into local decision-making processes.	**49**	EI-4, CL-2
Equitably Expand Tree Canopy	Use canopy assessment data and the City's Equity Index to prioritize areas for tree planting and greening investments.	**53**	CL-2
Habitat and Species Under Stress from Climate Change	Take inventory of and protect climate refugia, and fish and wildlife habitat needs for species under stress from climate change.	**64**	CL-2, CL-4
Historic and Culturally Significant Resources	Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, and rehabilitation of historic and architecturally significant structures.	**66**	CE-5, CL-1, CL-2, PR-4
Climate Resilient Development	Integrate climate resiliency best practices into the City's review of new development.	**72**	CL-1, CL-2, PFS-1
Native Landscapes	Incorporate native plantings, food forests, and agroforestry into parks and public spaces to support food security, ecological health, and cultural knowledge sharing	**94**	PR-3, CL-2, EO-3

Supporting Policy	Description	No.	Related Goals
Pollinator Habitats	Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide free landscaping, removal and reducing use of invasive species, enhancing biodiversity, and connecting natural spaces across the city though pollinator-friendly plantings.	**103**	CL-2, PR-2, PR-3, CL-4
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the city's identity, economy, history, and future.	**104**	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Protect and Restore Critical Areas and Shorelines	Protect critical areas, shorelines and other ecologically significant areas, ensure no net loss of ecological function through avoidance and mitigation of impacts, and apply conservation design principles to restore and enhance degraded areas.	**108**	CL-2
Reduce Heat Island Effect	Minimize impacts of the urban heat island effect, reduce geographic temperature disparities, and safeguard vulnerable populations from the adverse effects of extreme heat.	**115**	CL-1, CL-2, CL-4
Regional Trail and Open Space Networks	Work with nonprofit and private partners, Clark County and adjacent cities to build out the regional trail network for recreation and active transportation purposes.	**123**	TM-1, PR-2, CL-2
Strategic Reuse of Excess Right-of-Way	Analyze suitability of excess and unneeded ROW for adding tree canopy, native planting, nature spaces, and stormwater management systems.	**137**	CL-1, CL-2, LU-3, CL-4, PR-2

Goal: CL-3 Decrease Emissions

Vancouver is a carbon-neutral community that excels in reducing carbon emissions and criteria pollutants through implementing sustainable practices and green infrastructure.

Achieving a carbon-neutral future requires transforming how Vancouver produces and uses energy, constructs buildings, manages waste, and moves people and goods throughout the community. This goal establishes a comprehensive approach to reducing GHG emissions and criteria pollutants by integrating clean energy, efficient buildings, sustainable transportation, and circular-economy practices into the City's long-term growth strategy. This goal supports both climate mitigation and public health by cutting pollution at its source and ensuring that the benefits of cleaner air, lower utility costs, and healthier environments reach all Vancouver residents.

A major focus of CL-3 is reducing emissions from buildings and infrastructure, which account for a significant share of communitywide emissions. Policies supporting this goal advance energy-efficient and climate-resilient building design, encourage adaptive reuse of existing structures, and promote the use of low-carbon and regionally sourced materials to reduce embodied carbon in new construction. Expanding solar access—especially for low-income renters and homeowners, along with supporting renewable energy storage and grid upgrades, ensures that the energy Vancouver uses becomes increasingly clean, reliable and affordable. Complementary procurement and maintenance practices further lower emissions by prioritizing green materials, reducing plastics and harmful chemicals, and adopting sustainable alternatives across City operations.

Another major element of this approach is long-term changes needed to shift Vancouver's transportation and land use patterns. The policies outlined in this plan promote low-carbon transportation alternatives, including electric vehicles, hybrid technologies, and emerging clean-fuel options—while investing in the infrastructure needed to support them. Equally important, this goal calls for land use patterns that lower per-capita vehicle miles traveled (VMT) by concentrating new housing and employment in key centers identified in the growth concept. By coordinating with regional partners, such as Clark County, RTC, and C-TRAN, Vancouver aligns local decisions with regional mobility systems to expand multimodal options, reduce congestion, and improve air quality.

Waste reduction is a key component of this goal. Policies that increase waste diversion, enhance composting and resource recovery, and reduce food waste help cut emissions from landfills and

support a more circular local economy. Ensuring surplus food is redirected to underserved communities also advances food security, equity and community health.

Supporting Policy	Description	No.	Related Goals
Adaptive Reuse	Support efforts to retrofit or repurpose underutilized buildings, structures and infrastructure for the development of new housing and commercial spaces.	**9**	LU-2, CL-3
Community Safe Routes	Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.	**33**	TM-1, TM-2, PFS-3, PR-2, CL-3
Embodied Carbon	Prioritize local source materials, low-carbon materials and material reuse in City-led infrastructure and redevelopment projects.	**44**	CL-3, EO-3
Energy Efficient and Climate Resilient Buildings	Ensure that buildings contribute to the City's GHG reduction goals and protect occupants from pollution, extreme weather and other climate hazards.	**48**	CL-1, CL-3
Environmentally Conscious Procurement and Maintenance	Include criteria related to the use of environmentally sustainable materials and practices in procurement processes and maintenance contracts.	**51**	PFS-1, CL-3
Low-carbon Fuels	Work with transportation, industry and utility partners to support the transition to low-carbon fuels.	**85**	CL-3, CL-4
Low Carbon Transportation Alternatives	Adopt new technologies and invest in supportive infrastructure to increase the adoption of electric, hybrid, and alternative fuel vehicles to reduce community emissions.	**86**	CL-3

Supporting Policy	Description	No.	Related Goals
Reduce Built Environment Emissions	Reduce emissions from buildings, structures and infrastructure in the community.	110	CL-3, PFS-1
Reduce Food Waste	Reduce food waste in the community and ensure surplus food supply is directed to underserved communities without fresh food access.	114	CL-3, EO-3
Reduce Solid Waste	Increase waste diversion rates through a system that minimizes landfill reliance, reduces GHG emissions, prioritizes composting and encourages resource recovery.	117	CL-1, CL-3, CL-4, EO-3, PFS-1
Reduce VMT and GHG per Capita	Implement land use patterns that reduce VMT, traffic congestion, and associated GHG emissions per capita, while improving safety and air quality.	118	CL-3, CE-3, TM-2
Regional Planning	Coordinate closely with Clark County, other cities, and other government entities, such as C-TRAN, RTC, and school districts, to sustainably manage urban growth areas, efficiently deliver urban services, expand regional transit and multimodal connectivity, and coordinate on shared goals and responsibilities, in accordance with adopted countywide planning policies.	122	LU-4, CL-3, TM-2, TM-1
Solar Access	Expand residential, commercial and industrial access to solar power to meet energy needs.	134	CL-1, CL-3
Support the Use of Renewable Energy	Encourage new renewable energy infrastructure and promote development of storage systems to ensure a stable, resilient and sustainable energy grid.	151	CL-3, PFS-1

Goal: CL-4 Environmental Health

Community members experience better environmental health conditions through the protection and enhancement of local ecosystems, improved air and water quality, reduced exposure to environmental hazards, and increased access to natural spaces.

Environmental health is essential to community well-being, and the policy approach proposed in this plan responds by focusing on improving the air, water, ecosystems, and neighborhood conditions that shape daily life for Vancouver residents. Climate change and historic land use patterns have created uneven exposures to pollution, extreme heat, flooding, noise, and environmental hazards—disproportionately affecting frontline communities identified in Appendix H, Climate Vulnerability Assessment, and Appendix I, Health Impact Assessment. The policies in this section aim to reduce these disparities by protecting ecosystems, improving environmental quality, and expanding access to healthy natural spaces and community resources.

A central strategy outlined in this goal is reducing the urban heat island effect and improving air quality, particularly in areas with limited tree canopy and for residents who face greater health risks. Investments in shade, vegetation, and climate-resilient building design help safeguard people during extreme heat and wildfire smoke events, while targeted efforts to improve indoor air quality reduce exposure to particulates, nitrogen dioxide, carbon monoxide, and other harmful pollutants common in older or poorly ventilated homes.

Reducing environmental burdens also requires rethinking how waste, fuels, and materials flow through the city. Expanded waste diversion, composting, and resource recovery cut pollution associated with landfills, while support for low-carbon fuels and cleaner transportation technologies reduces emissions of pollutants that disproportionately impact neighborhoods along high-traffic corridors. Addressing noise pollution from freight, aviation, industrial operations, and major roadways further improves quality of life, especially in residential areas and places where vulnerable populations live.

Healthy ecosystems play a critical role in environmental health. Policies promote identifying and protecting species and habitats under climate stress, conserving climate refugia, and expanding

pollinator-friendly, pesticide-free landscapes that enhance biodiversity. Conservation and restoration efforts also support cleaner waterways, healthier soils, and stronger ecological connections across the city. Water-efficient technologies and conservation practices help maintain long-term water availability and protect the integrity of local watersheds.

Equitable access to natural spaces and community facilities is another essential focus. Expanding parks and green spaces in underserved neighborhoods, improving connections to existing natural areas, increasing tree canopy and ensuring housing is located near parks supports both physical and mental well-being. New and expanded community centers offer cultural, recreational, and educational programming, strengthening social networks and providing safe indoor spaces during climate-driven events. Land use strategies—including brownfield remediation, infill development on underutilized lots, and careful siting of new housing away from major stationary pollution sources—further reduce residents' exposure to environmental hazards.

Supporting Policy	Description	No.	Related Goals
Broaden Equitable Access to Natural Spaces and Parks	Increase equitable access to natural spaces and parks by investing in new and improved facilities in underserved neighborhoods and siting new accessible housing close to existing and future parks.	23	CL-4, PR-3, H-1, EI-2
Conserve Water Resources	Encourage water-efficient technologies and practices to reduce consumption and ensure sustainable water availability amid climate change and growing demand.	37	CL-1, CL-4, PFS-1
Habitat and Species Under Stress from Climate Change	Take inventory of and protect climate refugia, and fish and wildlife habitat needs for species under stress from climate change.	64	CL-2, CL-4
Indoor Air Quality	Improve indoor air quality for residents most susceptible to negative impacts from exposure to particulates, carbon monoxide, nitrogen dioxide, and lead.	79	CL-4

Supporting Policy	Description	No.	Related Goals
Low-carbon Fuels	Work with transportation, industry and utility partners to support the transition to low-carbon fuels.	**85**	CL-3, CL-4
Mitigate Noise Pollution	Reduce and mitigate noise pollution from major stationary and mobile sources, including air travel, vehicles, freight, railroads and high-intensity industrial uses.	**89**	EI-1, CL-4
Pollinator Habitats	Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide free landscaping, removal and reducing use of invasive species, enhancing biodiversity, and connecting natural spaces across the city though pollinator-friendly plantings.	**103**	CL-2, PR-2, PR-3, CL-4
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the city's identity, economy, history, and future.	**104**	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Reduce Environmental Health Disparities	Focus on areas with high environmental health disparities when mitigating the impacts of air, water, heat noise, and light pollution.	**113**	EI-1, CL-4
Reduce Heat Island Effect	Minimize impacts of the urban heat island effect, reduce geographic temperature disparities, and safeguard vulnerable populations from the adverse effects of extreme heat.	**115**	CL-1, CL-2, CL-4

Supporting Policy	Description	No.	Related Goals
Reduce Impacts of Point Source Pollution on Housing	Avoid siting new housing near known stationary sources of air, water, heat and light pollution, and facilitate site and building design that mitigates impacts from stationary pollution sources for both new and existing housing.	**116**	CL-4, LU-2
Reduce Solid Waste	Increase waste diversion rates through a system that minimizes landfill reliance, reduces GHG emissions, prioritizes composting and encourages resource recovery.	**117**	CL-1, CL-3, CL-4, EO-3, PFS-1
Strategic Reuse of Excess Right-of-Way	Analyze suitability of excess and unneeded ROW for adding tree canopy, native planting, nature spaces, and stormwater management systems.	**137**	CL-1, CL-2, LU-3, CL-4, PR-2
Underdeveloped Lots and Brownfields	Prioritize, facilitate and incentivize development on infill and underutilized lots, and clean up brownfield sites.	**157**	LU- 3, LU-4, LU-1, PFS-1, CL-4

Chapter 6 - Key Implementing Actions

- ✓ Update VMC Title 17 to reflect new requirements of the Green Building Program.
- ✓ Implement a Green Building Program for new construction.
- ✓ Update VMC Titles 16 and 17 to integrate and advance middle housing production.
- ✓ Explore green building policies for existing commercial and industrial buildings.
- ✓ Perform minor updates to the Urban Forestry Management Plan to align with the Comprehensive Plan.
- ✓ Develop a municipal fleet decarbonization roadmap and purchasing policy.
- ✓ Update the Climate Action Framework (CAF) to align with the Comprehensive Plan.
- ✓ Advance electric vehicle education and advocacy efforts.
- ✓ Develop a roadmap for accelerating adoption of low-carbon fuels.
- ✓ Add resources to expand the City's capacity for climate hazard preparedness.
- ✓ Expand urban tree canopy cover and restore urban natural areas and nature spaces.
- ✓ Develop a residential resiliency and decarbonization program.
- ✓ Assess opportunities to install large-scale solar installations on City-owned properties.
- ✓ Identify opportunities to optimize City-owned properties for natural resource benefits.
- ✓ Develop policies and programs to advance middle housing and transit-oriented development.

Parks, Recreation and Cultural Services



7

Introduction

This chapter of the Comprehensive Plan captures the vision, mission, goals, and policy recommendations from the recently adopted *Vancouver Parks, Recreation & Cultural Services Comprehensive Plan* (*VPRCS Comprehensive Plan*) and brings forward key land use recommendations based on existing conditions within Vancouver, and recent studies conducted through the *Our Vancouver* Comprehensive Planning process.

The VPRCS Comprehensive Plan, adopted in 2022, provided an in-depth analysis of existing parks, recreation and cultural services conditions within Vancouver and identified 10-year goals, which are currently being implemented. This chapter seeks to carry through pertinent information from the *VPRCS Comprehensive Plan* through a land use planning lens—looking to provide an overview of existing programs and system structures that affect future land use decisions—and provide guidance on how the City can balance growth with the provision of parks and recreation. Building on the



Vision: Parks and Recreation

We strive for a future where all people enjoy increased access to cultural events, public art, natural areas, parks, community and green spaces, and an expansive network of trails and greenways. We recognize that art, culture and open spaces are critical elements of community health, wellness and quality of life. We commit to building inclusive and safe public spaces that reflect the diversity of our community without cost barriers, while conserving and preserving natural areas and adapting to climate change. Embracing native plants and species, we aim to create biodiverse havens that enhance ecological resilience. With a focus on health and well-being, our parks will offer diverse recreational opportunities and engaging programming, ensuring a thriving and interconnected community for generations to come.

robust engagement process from the *VPRCS Comprehensive Plan*, the *Our Vancouver* planning process focused on engaging with Vancouver residents through the community survey, Community Partner discussions, and community working groups; in-person engagement events; and online resources, asking respondents to provide feedback on a variety of topics related to parks and recreation in Vancouver. This feedback served as the baseline for developing the vision and goals for this chapter.

VPRCS Comprehensive Plan Overview

The parks system in Vancouver is owned, maintained and managed by the City of Vancouver Parks, Recreation, and Cultural Services Department. The department is also tasked with creating and updating a parks plan to guide the future acquisition and development of parks within the city. Washington's GMA requires that parks plans are updated in coordination with updates to land use plans and development regulations every eight years in order to ensure that City and County policies reflect state statutes.

Community Feedback

- Increase equitable access to parks and open spaces for all Vancouver community members—both for non-White and low-income residents, and in areas that are currently underserved, such as East Vancouver.
- Maintain, improve and expand on existing parks and amenities—including expanded tree canopy, and the introduction of shelters, shade structures or areas, and integration of upgraded facilities for playgrounds, restrooms and parking.
- Accommodate cultural spaces, programming and community centers addressing specific needs and low-cost and free activities, particularly for Vancouver's youth.
- Encourage community connection through City parks, community centers, libraries, farmers markets and gathering places like the waterfront.
- Diversify recreation offerings for both outdoor and indoor recreation spaces—including community pools, playgrounds, skateparks and pump tracks, museums, community events, gardens, art and performance spaces, trails and dog parks.
- Implement climate resilience design principles through use of native plans, protections of natural ecosystems, and maintaining and expanding the city's tree canopy and naturalized landscapes.

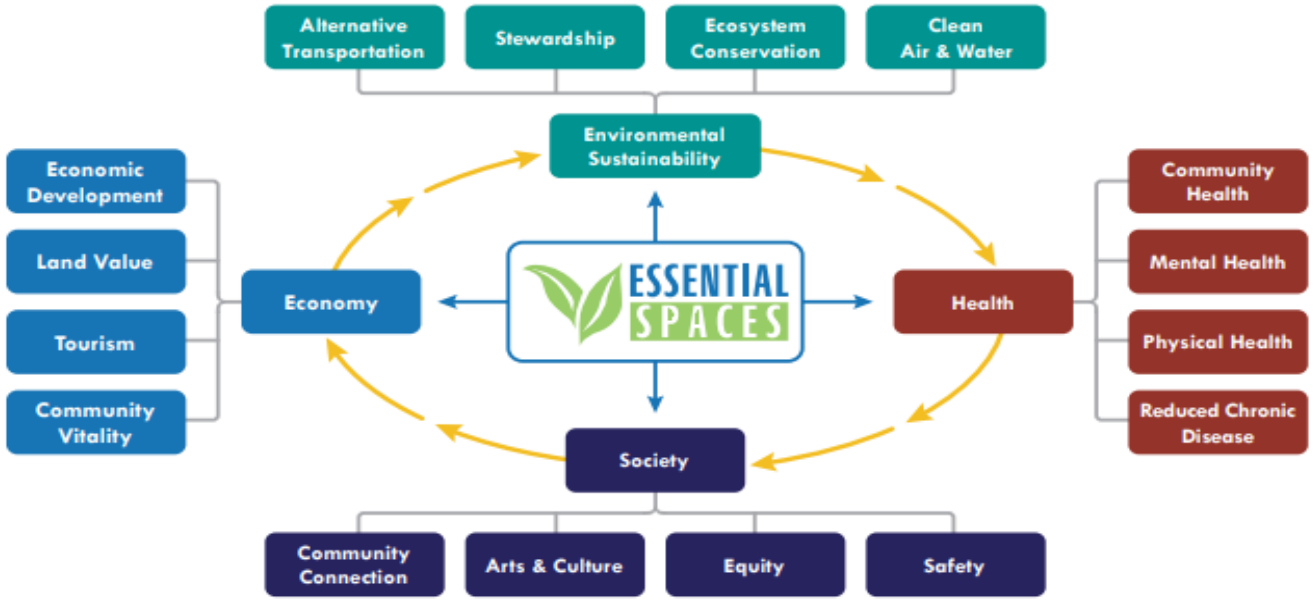
In this case, the *VPRCS Comprehensive Plan* was adopted prior to the *Our Vancouver* planning process and the most current EIS, both of which will inform future discussions and updates to the next Vancouver parks plan. The work undertaken for the *VPRCS Comprehensive Plan*, in similar fashion to this planning process, included a heavy focus on community outreach and engagement ensuring that the vision, mission, community goals and policies were reflective of the voices and

needs of the Vancouver community. The following sections provide an overview of critical content from the *VPRCS Comprehensive Plan*.

Vision and Essential Spaces Framework

The concept of Essential Spaces was selected as the primary theme for the *VPRCS Comprehensive Plan*, centering on the idea that the role of parks, recreation, trails, natural areas, and cultural services contribute heavily to the physical, mental, and economic health of the Vancouver community. What the City has defined as "Essential Spaces" provide enormous benefits to residents, workers, and visitors through the direct impact they have on society, the local economy, sustainability efforts, and community health. These impacts are further illustrated in Figure 21.

Figure 21. Essential Spaces Graphic, VRPCS Comprehensive Plan 2022



A planning framework was created for the *VPRCS Comprehensive Plan* that captures community values, the City's commitment to Diversity, Equity, and Inclusion and additional objectives identified by Vancouver's City Council, including climate action and safety. All together, these guiding principles emphasize the importance of the stewardship of public resources, inclusive access, and the creation of inclusive spaces.

VPRCS Vision and Community Goals

The *VPRCS Comprehensive Plan* includes a vision, a mission statement, and eight community goals defined through the planning and outreach process. These goals provide the foundation for the plan focusing on how the City can enhance its parks, recreation facilities, natural areas, and cultural services. The table below illustrates how the *VPRCS Comprehensive Plan* community goals relate to the *Our Vancouver Comprehensive Plan* goals.

Table 11. VPRCS Comprehensive Plan Community Goals versus Our Vancouver Comprehensive Plan Goals

VPRCS Community Goals	Complementary Comprehensive Plan Goals
Provide safe and equitable access to parks, natural areas, and public arts and cultural spaces for all residents.	PR-2 Parks, Trails, and Natural Spaces: Vancouver's residents have access to a well-connected and expanded network of developed parks, trails, and natural areas that support outdoor recreation, biodiversity, and climate resilience, that serve as vital hubs for community gatherings, cultural events and a shared sense of place.
Provide an interconnected system of park properties and public spaces that support alternative modes of transportation, public health, recreational opportunity and environmental stewardship.	PR-2 Parks, Trails, and Natural Spaces: Vancouver's residents have access to a well-connected and expanded network of developed parks, trails, and natural areas that support outdoor recreation, biodiversity, and climate resilience, that serve as vital hubs for community gatherings, cultural events and a shared sense of place.
Preserve Vancouver's historic and cultural heritage.	PR-4 Thriving Cultural Landscape: Vancouver supports a thriving cultural landscape for residents and visitors by investing in public art, cultural centers and facilities, historic preservation, and supporting community centered initiatives and opportunities for creative expression that reflect the city's diverse identities and historic roots.
Expand Level of Service and Equity Gap Analysis to inform and guide project and funding opportunities and priorities.	PR-1 Increase Community Health through Recreation: Vancouver has safe and equitable access to a quality and diverse system of parks, natural areas, amenities, recreational facilities and programs that promote physical and mental well-being, cater to the varied interests and needs of community members and contribute to a vibrant and active community.
Update Improvement Level definitions to include innovative approaches that meet the needs of a growing and diversifying community.	CE-2 Inclusive and Affirming Environments: Vancouver's public spaces and neighborhoods are inclusive and affirming across race, class, age, sex, gender identity, ability, religion, national origin and citizenship status, creating a sense of belonging and safety.
Maintain and enhance parks, trails, natural areas, culture and heritage spaces, recreation facilities and community assets to meet identified standards.	PFS-1 Public Facilities and Services: Vancouver has high-quality public facilities, services, and utilities that are affordable, efficient, well maintained, and meet the needs of a growing population.
Establish and meet goals outlined in the departmental program areas.	PR-3 Community Health and Wellness: Vancouver community members have access to high-quality public spaces that support physical and mental well-being,

VPRCS Community Goals	Complementary Comprehensive Plan Goals
	active lifestyles, connection to nature, and sense of community belonging.
Reflect the community we serve through creative public engagement, collaborative planning and culturally responsive communication.	EI-1 Equitable Community: All community members have equitable and inclusive access to opportunities and resources, including communities most impacted by past and present exclusionary practices.

Vancouver's Park and Recreation System

As of 2022, publicly accessible lands in Vancouver were estimated at approximately 3,800 acres or roughly 12 percent of the city's total land area, where approximately 1,700 acres are identified as City-owned park lands, comprising 113 sites. The City also operates the Firstenburg and Marshall/Luepke Community Centers, which feature swimming pools, gyms, fitness amenities, a climbing wall, senior centers, and community rooms.

Table 12. Park System Inventory

Park Type	Number of Sites	Area (acres)
Neighborhood Park	91 Sites (includes 11 undeveloped sites, 55 developed sites, and 25 school sites)	314.84
Community Parks	17 Sites (includes 4 undeveloped sites and 13 developed sites)	287.69
Regional Parks	2 Sites	489.40
Urban Natural Areas	22 Sites	280.11
Special Facility	9 Sites (includes 3 developed City of Vancouver sites, 2 developed Clark County sites, 1 developed school site, and 3 developed sites managed by other providers)	332.91
Regional Natural Areas	7 Sites (includes 6 undeveloped City of Vancouver sites and 1 undeveloped Clark County site)	1,044.58
Total Park Acreage	-	2,749.53

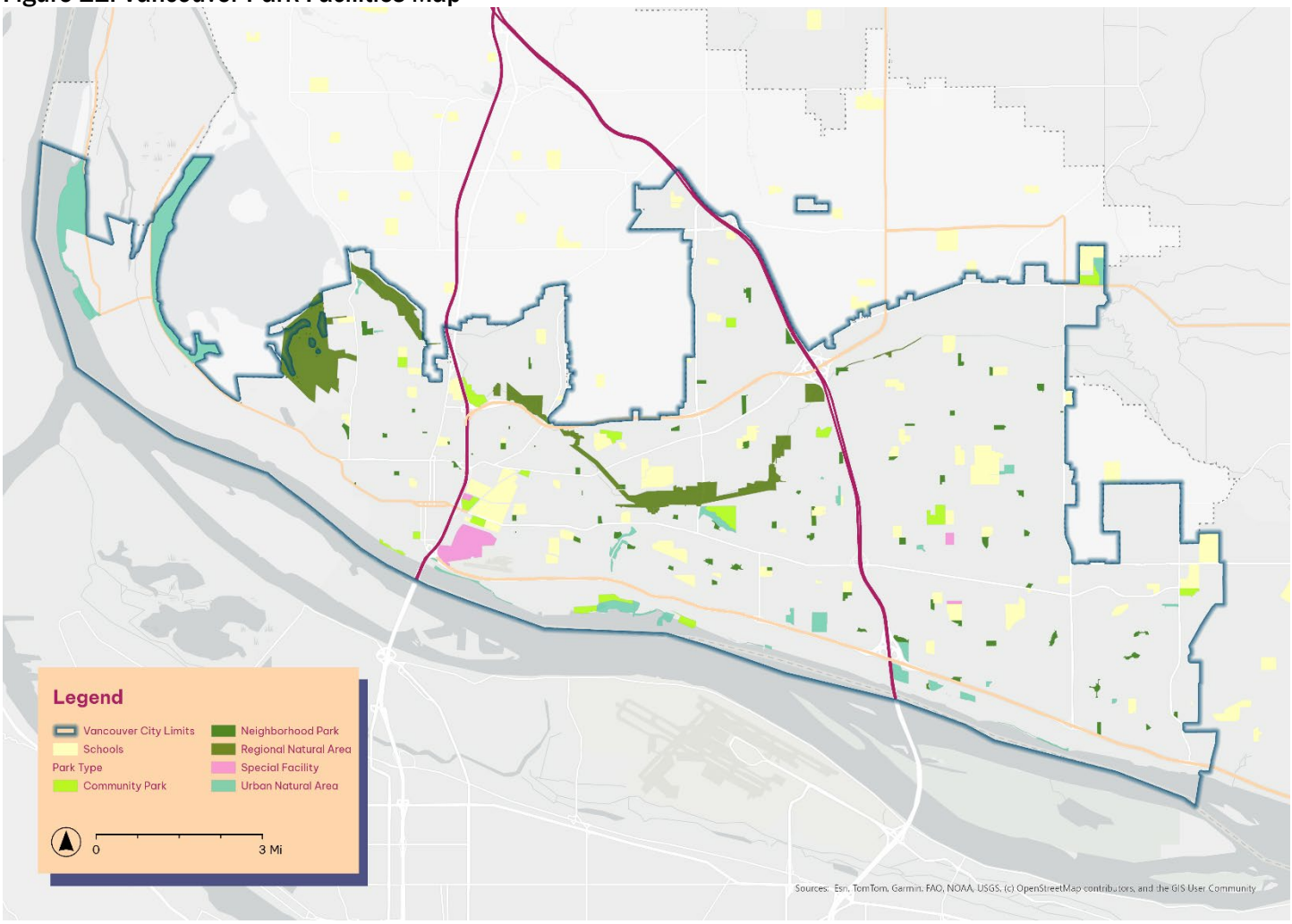
Note: This table reflects updates to the number of sites and acreage since the *VPRCS Comprehensive Plan* as part of the Environmental Impact Assessment for **OUR VANCOUVER.**

Source: VPRCS Comprehensive Plan

The City continuously invests in its park system primarily through park acquisitions, park development, or rebuilding or renovating existing parks, diversifying the types of parks and spaces available to the Vancouver community. In order to accomplish this, the VPRCS Department relies on an organizational framework for its parks that includes park classification types, maintaining a parks inventory, setting and recording parks LOS standards, using diverse funding mechanisms, and planning for parks acquisitions and capital improvements.

Figure 22 below, Vancouver Park Facilities Map, illustrates the city's boundaries, delineates the Park Impact Fee (PIF) Districts, and includes Regional Parks, Community Parks, Neighborhood Parks, Urban and Regional Natural Areas, Special Facilities, other public lands, and schools.

Figure 22. Vancouver Park Facilities Map



Parks System Classifications

The City of Vancouver is transitioning from a traditional core-and-suburb model to a denser, mixed-use urban environment. This evolution demands adaptive planning to address changing zoning, densities, mobility, and park needs. The city's park system is organized into eight classification types based on landscape characteristics, access, development potential, local park needs, and use patterns. These classifications guide the optimal use of parkland, ensuring diverse recreational opportunities through strategic funding and a balance between natural resource protection and park development.

Together, Vancouver's parks provide spaces for play, connection, and environmental stewardship, forming a resilient network that supports recreation, wellness, and habitat conservation. The current parks classifications are outlined in Table 13, below, and include both pre-existing park types in Vancouver and two new additional classifications, Civic Plazas and Linear Parks, that were introduced in the 2022 *VPRCS Comprehensive Plan*.

Table 13. VPRCS Comprehensive Plan Parks Classifications

Type	Description
Neighborhood Parks	Typically, 3 to 5 acres, offering amenities like playgrounds, sport courts, turfed areas, gardens, native plant resource areas, pathways and trails, and picnic areas. These parks are designed for non-organized recreational opportunities that support healthy lifestyles, neighborhood identity, social interaction, and the preservation of natural resources.
Community Parks	Ranging from 20 to 100 acres, these parks serve as hubs for organized recreation and events for a broad segment of the population. In addition to typical of a Neighborhood Park, Community Parks feature sports fields, skate parks, picnic shelters, community gardens, trails, event spaces, public art, and cultural features. These parks typically include more support facilities, such as parking and restrooms, and may also integrate natural areas, passive recreation spaces, and community facilities like community centers or senior facilities.
Linear Parks	Developed landscaped areas or other lands that follow linear natural or man-made corridors like rivers, abandoned railroad rights-of-way, canals, and utility corridors. Linear Parks typically feature trails, signage, seating, landscaping, small play areas, and viewpoints and are intended to expand the network and connectivity of trails and pedestrian corridors, provide shade to users of the transportation network, and reduce the impact of the heat island effect.
Civic Plazas	Found in urban centers or town squares, civic plazas are public gathering spaces with landscaping, seating, performance and vendor areas, public art, and fountains. They encourage community connection and may be managed in partnership with other entities.
Regional Parks	Usually over 50 acres, Regional Parks provide facilities for a wide range of activities, including sports fields, extensive trail systems, and large picnic areas or shelters. These parks also typically include passive recreation space and unique natural features in addition to support facilities, such as parking and restrooms.
Natural Areas	Ranging from a single acre to hundreds, natural areas provide opportunities for nature-based recreation and education, such as birdwatching, walking, biking, hiking, and biking, serving both local and regional needs.
Special Facilities	Special Facilities, or special use areas, are stand-alone facilities that do not have a minimum size. They include community centers, aquatic centers, sports complexes, or skate parks.
Trails	Trails are not considered a park classification but rather an improvement/amenity.

Source: VPRCS Comprehensive Plan

Parks and Recreation System Evaluation

Vancouver's park system strives for equitable access through careful geographic distribution and service area standards. In simpler terms, the City aims to provide residents with access to a park within a certain distance of their homes—a half-mile service area, or 10-minute walk along public rights-of-way is recognized as a reasonable expectation for residents. This is aligned with national best practice as predicated by the National Parks and Recreation Association, which establishes national guidelines for service area standards.

Figure 23. Park Service Area Diagram



Parks in Vancouver have different indicated service areas depending on classification. For example, Vancouver's Neighborhood Parks are designed to serve residents within a half-mile radius, which equates to approximately a 10-minute walk. Community Parks, on the other hand, serve larger areas ranging from half a mile to 3 miles, offering both walkable access and broader community coverage. Figure 23 illustrates how these walksheds (illustrated in green as park service areas) are determined by following public rights-of-way and easements from all access points to park sites, ensuring an accurate representation of accessible routes for residents.

The City relies heavily on service area mapping to determine which locations are served by parks, and to identify gaps where new parks or services may be needed.

In the update to the *VPRCS Comprehensive Plan*, staff identified the need to expand on typical park metrics to reflect existing conditions and better assess the equitable distribution of parks across Vancouver. The *VPRCS Comprehensive Plan* developed a two-part methodology that involves combining demographic analyses and park scoring to guide reinvestment priorities. This methodology, though complex, reflects national best practice through layering equity considerations into the criteria:

- A detailed geographic information system analysis is performed at the Census Block level to identify areas with the greatest need for park access, focusing on populations, such as residents under 18 and over 65, people of color, communities below the poverty level, households with low-median income, individuals with disabilities, areas with high obesity rates, and regions of high population density per acre.
- Evaluation of park property using a comprehensive scoring matrix that measures factors related to quantity, quality, safety, sustainability, and accessibility.

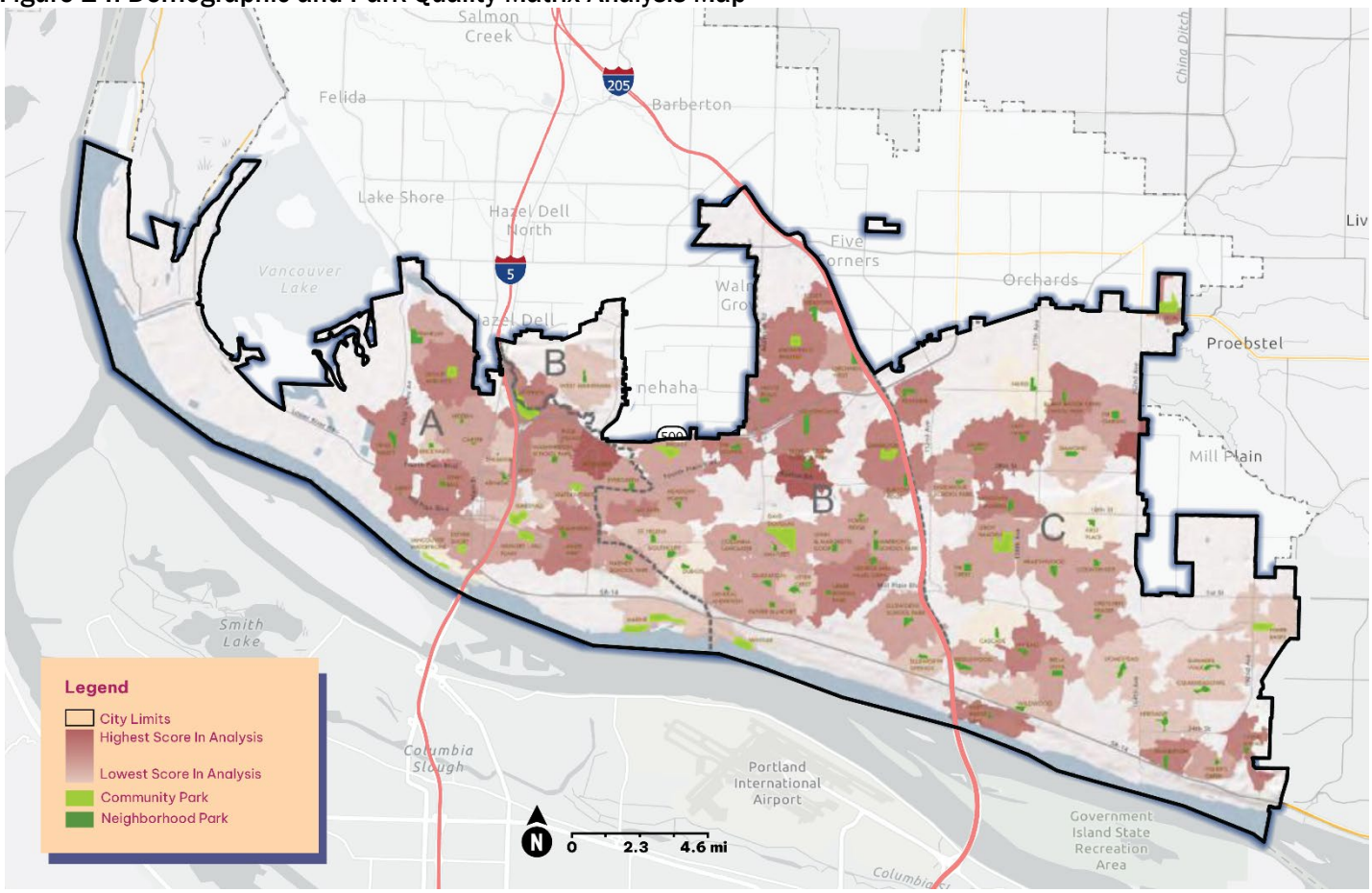
- Incorporating additional criteria, including (1) the baseline half-mile service area, (2) gaps between existing LOS and adopted standards, (3) current development status, (4) time since acquisition, (5) potential for improved accessibility, (6) safety, (7) resource protection, (8) diversity of recreation opportunities, (9) condition and lifespan of assets, (10) need for safety enhancements, (11) sustainability of infrastructure and natural resources, and (12) accessibility for people with physical limitations.

The outcome of this analysis was a matrix that prioritizes projects for reinvestment, ensuring that resources are allocated where they will have the greatest community impact and maximize the overall value of the park system for Vancouver residents.

It is anticipated that Vancouver will experience an increased demand for youth activities, after-school programs, and programming for active older citizens as it continues to grow, with an expanding need for intergenerational recreation opportunities and the implementation of inclusive design practices to welcome a more diverse community of residents. By establishing a baseline methodology, the City has created a tool that can be regularly used to evaluate residents' access to Vancouver's park and recreation system. This tool can be further refined and tailored to the city's needs as future policy work is undertaken as part of the next parks plan update.

Figure 24 shows park level of service and need across Vancouver by evaluating park quantity, quality, safety, sustainability, and accessibility within ½-mile service areas to identify gaps and prioritize reinvestment. Areas in the darkest shade indicate the greatest need for park investments. It illustrates how demographic information is layered with park quality data to create composite scores, which can help decision makers prioritize available funding for future parks planning purposes.

Figure 24. Demographic and Park Quality Matrix Analysis Map



Source: VPRCS Comprehensive Plan.

Park Demand, Park Need, and Total Level of Service

The City of Vancouver uses three calculations to guide the monitoring of its parks system: (1) LOS, (2) Park Demand, and (3) Park Need where:

- LOS is measured as the number of park acres per 1,000 residents.
- Park Demand is the acres of parkland needed to serve a population at a set standard.
- Park Need identifies the acreage required to bring the LOS into alignment with the standard.

The City updated these calculations in the *VPRCS Comprehensive Plan*, reviewing its inventory of parks, recreation facilities, natural areas, and trails owned and operated by VPRCS. The City uses this inventory to identify acreage by park classification and measure existing conditions against set LOS standards looking at how many acres are needed to be acquired and/or developed. VPRCS used the following standards for Neighborhood Parks, Community Parks, and Urban Natural Areas classifications in the 2022 plan update.

- *Park Acquisition*: 6 acres per 1,000 residents
- *Park Development*: 4.25 acres per 1,000 residents

Table 14 outlines the City-adopted acquisition and development standards for Neighborhood Parks, Community Parks, and Urban Natural Areas.

Table 14. VPRCS Comprehensive Plan Park Acquisition and Development Standards

Park Classification	Acquisition Standard (in acres per 1000 residents)	Development Standard (in acres per 1000 residents)
Neighborhood Park	2.00	2.00
Community Park	3.00	2.25
Urban Natural Area	1.00	N/A
Total	**6.00**	**4.25**

Source: VPRCS Comprehensive Plan

Table 15 , Table 16, Table 17, and Table 18 detail the calculated Park Demand and Park Need established in 2022, differentiated by Park Impact Fee (PIF) Districts (A, B, or C). Park Demand calculations indicate a need for approximately 1,200 additional acres of parkland, of which over 800 acres need to be developed to adequately serve Vancouver's 2022 population. Park Need indicates that the City needed to acquire approximately 440 acres of parkland to bring its existing acreage into alignment with its LOS.

Table 15. VPRCS Comprehensive Plan Park Demand 2022, Acquire

PIF District	Population	Neighborhood Park (acres) Acquire	Community Park (acres) Acquire	Urban Natural Area (acres) Acquire	Total (acres) Acquire
A	38,770	77.5	116.3	38.8	232.6
B	61,324	122.6	183.9	61.3	367.9
C	94,592	189.2	283.8	94.6	567.6
Total	**194,686**	**389.35**	**584.02**	**194.67**	**1168.05**

Table 16. VPRCS Comprehensive Plan Park Demand 2022, Develop

PIF District	Population	Neighborhood Park (acres) Develop	Community Park (acres) Develop	Urban Natural Area (acres) Develop	Total (acres) Develop
A	38,770	77.5	87.2	N/A	164.8
B	61,324	122.6	138.0	N/A	260.6
C	94,592	189.2	212.8	N/A	402.0
Total	**194,686**	**389.35**	**438.02**	**N/A**	**827.37**

Source: VPRCS Comprehensive Plan

Table 17. VPRCS Comprehensive Plan Park Need 2022, Acquire

PIF District	Population	Neighborhood Park (acres) Acquire	Community Park (acres) Acquire	Urban Natural Area (acres) Acquire	Total (acres) Acquire
A	38,770	23.1	16.0	0.1	**39.2**
B	61,324	0.6	76.4	28.4	**105.4**
C	94,592	51.5	218.3	20.3	**290.2**
Total	**194,686**	**75.2**	**310.7**	**48.8**	**434.8**

Table 18. VPRCS Comprehensive Plan Park Need 2022, Develop

PIF District	Population	Neighborhood Park (acres) Develop	Community Park (acres) Develop	Urban Natural Area (acres) Develop	Total (acres) Develop
A	38,770	23.8	0.3	N/A	**24.1**
B	61,324	15.1	40.1	N/A	**55.2**
C	94,592	68.7	170.6	N/A	**239.3**
Total	**194,686**	**107.6**	**211.0**	**N/A**	**318.6**

Source: VPRCS Comprehensive Plan

Table 19 highlights the city's total LOS, combining Neighborhood and Community Park categories. Across measurable park classifications, the City of Vancouver provides 4.46 acres of parklands per 1,000 residents citywide—which falls short of the City's standard of 6 acres acquired Neighborhood and Community Parks per 1,000 residents, and national guidelines provided by the National Recreation and Park Association, indicating 10.2 acres per 1,000 residents as best practice.

Table 19. Total Level of Service

Park Classification	Current Level of Service (in acres of parkland per 1,000 population)
Neighborhood and Community Parks	3.02
Urban Natural Areas	1.44
Total	**4.46**

Source: VPRCS Comprehensive Plan

While the City focuses LOS calculations on Neighborhood Parks, Community Parks, and Urban Natural Areas, other park classifications are also assigned acquisition standards. The *VPRCS Comprehensive Plan* set acquisition standards for Regional Parks (10 acres per 1,000 residents) and also introduced two new park classifications—Civic Plazas and Linear Parks, to provide outdoor park spaces in compact urban areas where traditional park parcels are limited—but did not assign a standard of service. Regional Natural Areas and Special Facilities are also included as park classifications without assigned acquisition standards. As indicated in Table 13, trails are not currently considered a park classification but rather an improvement or amenity. A detailed overview of acquisition and development standards and 2022 LOS by park classification is provided in Table 20.

Table 20. 2022 Park Classification Acquisition and Development Standards versus LOS

Park Classification	Acquisition/Development Standards	2022 Acquisition LOS (All PIF Districts)
Neighborhood Park	2 acres/2 acres per 1,000 residents	1.62 acres/1,000 residents
Community Park	3 acres/2.25 acres per 1,000 residents	1.40 acres/1,000 residents
Regional Park	10 acres/1,000 residents	6.80 acres/1,000 residents
Urban Natural Area	1 acre/1,000 residents	1.44 acres/1,000 residents
Regional Natural Area	No Adopted Standard	No Adopted Standard
Linear Park	No Adopted Standard	No Adopted Standard
Civic Plaza	No Adopted Standard	No Adopted Standard
Special Facilities	No Adopted Standard	No Adopted Standard

Source: VPRCS Comprehensive Plan

Recreation and Cultural Services

Recreation in Vancouver is designed to support a wide range of activities for residents of all ages, abilities, and backgrounds. It includes structured programs, such as aquatics, sports, and fitness, as well as informal opportunities for play, leisure, and social connection. The city's recreation facilities include community centers, pools, and sports fields.



Firstenburg Pool

Public input played a key role in shaping recreation priorities established in the *VPRCS Comprehensive Plan*. Through surveys, outreach events, and stakeholder meetings, residents expressed strong interest in more trails, youth programs, water play features, and outdoor fitness equipment. These preferences are reflected in recommendations identifying a need for upgrades to existing facilities and the development of new amenities that support active lifestyles and social interaction.



Día de Muertos Celebration

Engagement also identified barriers to recreation, such as cost, transportation, and physical accessibility. Recommendations for addressing community feedback include increasing parks and open space in East Vancouver, investing in safe multimodal infrastructure that connects people to parks and open space, improving ADA compliance, and offering culturally responsive programming.

Cultural services are recognized as an essential component of the city's identity, greatly impacting its sense of vitality and quality of life. The *VPRCS Comprehensive Plan* prioritizes equitable access to

cultural services, acknowledging that historically marginalized communities often face barriers to participation.

The *VPRCS Comprehensive Plan* highlights the need to expand culturally relevant programming and support for underrepresented groups, including Indigenous peoples, communities of color, LGBTQ+ residents, and people with disabilities. Strategies include increasing funding for community-led cultural initiatives, improving accessibility in cultural venues, and fostering partnerships with local artists and cultural organizations. The Cultural Services chapter of the *VPRCS Comprehensive Plan* identifies gaps in cultural infrastructure, including limited performance spaces, inadequate support for public art, and a need for flexible venues that can host a variety of cultural activities. Recommendations include investing in new cultural facilities, upgrading existing spaces, and integrating arts and culture into park and public space design. In late 2024, the City adopted a Cultural Access Program that will support improved and expanded cultural resources in the future, as it will generate approximately $7 million annually to improve access to arts, culture, heritage, and science across the community. Vancouver also seeks to make better use of schools, libraries, and other civic buildings as cultural hubs.

Preferred Alternative and Future Parks Planning

Gaps in LOS provide the basis for the City's land acquisition planning along with PIF allocation, measuring LOS and long-term planning for equitable access to recreation and green space throughout the city. Acquisition standards contribute to the City's goals for climate adaptation, tree canopy preservation and expansion, improved air quality, environmental justice, and prioritizing natural areas in historically underserved neighborhoods. These standards also assist the City in meeting the requirements of the Washington's GMA, which states that Comprehensive Plans must keep pace with projected population and development trends.

Priorities for parkland acquisition consider the four key criteria:

- **Geographic Equitable Access** to ensure all residents have equitable access to a park within a 10-minute walk (half a mile) (*VPRCS Comprehensive Plan*).
- **Population Growth and Development Trends** highlight new parks in rapidly growing neighborhoods, particularly east of I-205, where future residential density and family households are projected to increase (*VPRCS Comprehensive Plan*).
- **Network Connectivity and Access** prioritize sites that strengthen the citywide network of parks, trails, and greenways (*VPRCS Comprehensive Plan*).
- **Environmental Factors** protect lands that provide ecological value, such as tree canopy, wildlife habitat, flood mitigation, and climate resilience (EIS Report).

In an updated analysis conducted as part of the *Our Vancouver* planning process, Vancouver has identified a need to acquire 372.47 acres of parkland and develop 382.71 acres of parkland to meet its current metrics for LOS in 2025; see Table 21.

Table 21. Existing (2025) City Parks and Natural Areas Demand, Inventory, and Need by District (in acres)

PIF by District	Acquisition Demand	Acquisition Inventory	Acquisition Need	Development Demand	Development Inventory	Development Need
A	246.43	217.12	29.31	174.56	124.50	50.05
B	388.10	327.73	60.37	274.91	207.82	67.08
C	600.13	317.33	282.80	425.09	159.52	265.57
Total	**1,234.66**	**862.19**	**372.47**	**874.55**	**491.84**	**382.71**

Source: City of Vancouver 2025
Note: Park Impact Fee (PIF) District boundaries are shown in Figure 22. Demand calculated based on estimated 2025 population of 41,072 in PIF A, 64,684 in PIF B, and 100,021 in PIF C. Assumes LOS standard of 6 acres per 1,000 residents of acquisition need and 4.25 acres per 1,000 records for park development need. Need is calculated by subtracting the inventory (as of 2025) from the future projected demand.

As Vancouver continues to grow, the City will need to regularly evaluate the acquisition standards to reflect changes in population, community priorities, and new development. Population projections through 2045 indicate a need to acquire 823.81 acres of additional parkland and develop 702.41 acres to adequately serve the community; see Table 22.

Table 22. Future (2045) City Parks and Natural Areas Demand, Inventory, and Need by District (in acres)

PIF by District	Acquisition Demand	Acquisition Inventory	Acquisition Need	Development Demand	Development Inventory	Development Need
A	333.54	217.12	119.42	238.38	124.50	113.88
B	529.97	327.73	202.23	375.39	207.82	167.57
C	819.49	317.33	502.16	580.47	159.52	420.96
Total	**1,686.00**	**862.19**	**823.81**	**1,194.25**	**491.84**	**702.41**

Notes: (a) Park Impact Fee (PIF) District boundaries are shown in Figure 22. (b) Demand calculated based on estimated 2045 population of 56,090 in PIF A, 88,328 in PIF B, and 136,582 in PIF C, for a total population of 281,000 citywide. Assumes LOS standard of 6 acres per 1,000 residents of acquisition need and 4.25 acres per 1,000 records for park development need. Need is calculated by subtracting the inventory (as of 2025) from the future projected demand. Note: These citywide projections assume that the 2045 population distribution would be similar to the 2025 population distribution. The projections do not account for differences between the alternatives in housing capacity distribution by PIF district.

Competing land use interests will present challenges for the City in meeting these goals, but the *VPRCS Comprehensive Plan* outlines a plan for acquisitions, capital assets, and planned investments to begin implementation of measures to improve LOS.

To address LOS deficiencies, the *VPRCS Comprehensive Plan* identified several measures to be addressed in future parks plan updates. These include (1) identifying opportunities to acquire new community park sites or enhance larger neighborhood parks with community-level amenities; and (2) improving parks with low LOS by adding amenities, increasing user capacity, and enhancing both natural and built environments to promote sustainability and recreational diversity.

The *VPRCS Comprehensive Plan* also identifies the need to explore alternative metrics for measuring LOS and setting classification standards. The addition of two new park classifications, Civic Plazas and Linear Parks, will provide additional options for recreation as the city experiences growth through the 2045 horizon of the *Our Vancouver Comprehensive Plan*, and the City will need to focus efforts on updating acquisition standards and PIFs through an updated nexus study prior to the adoption of the next update to the *VPRCS Comprehensive Plan*.

Best Practices in Park System Planning

Many factors influence how cities establish guidelines for their park systems. In recent years, many cities have revisited how they designate parks, set LOS, and manage facility and asset investments in response to demographic shifts, climate considerations, equity priorities, and fiscal pressures. The following section summarizes current national best practices relevant to Vancouver's future park system planning.

Park Designation, System Definitions and Classifications

Setting citywide criteria helps prioritize park designations, land acquisitions, capital investments, and maintenance while aligning service expectations. Vancouver currently uses a classification system for its parks, open spaces and trails. As the city continues to grow, Vancouver may consider adding new park classifications and expanding its LOS standards to anticipate future land acquisitions or expansions and diversify opportunities for capturing additional parklands. The introduction of Civic Plazas and Linear Parks as new classifications paves the way for the City to reconsider how it is providing parks and recreation spaces in an urbanizing environment.

Most cities reexamine their park designation criteria and system definitions during updates to their Parks, Recreation, and Open Space Plans (typically every 8 to 10 years), with refinements to LOS standards or equity priorities every 3 to 5 years. These updates generally align with planning cycles and shifts in growth patterns, policy direction, or asset management frameworks rather than a fixed schedule. This aligns with NRPA's suggestion that comprehensive park system plans be updated roughly every 10 years with midcycle check-ins.

System Definition and Access

Traditionally, LOS has been measured using acres of parkland per 1,000 residents. While still relevant, many cities now use a broader LOS framework that incorporates access, equity, investment, and quality. The NRPA uses a benchmarking metric of 10.2 acres per 1,000 residents (NRPA 2025 Agency Review), which is higher than Vancouver's current 6 acres per 1,000 residents.

Beyond acreage, cities are increasingly evaluating whether all residents have meaningful access to parks using metrics, such as:

- 10-minute walk proximity, measured using walkshed analysis
- Quality of amenities, such as playgrounds, restrooms, or trails
- Equitable distribution across neighborhoods

Another emerging LOS approach evaluates the condition and functionality of park and facilities assets, such as playgrounds, restrooms and trails. The NRPA's dataset allows agencies to compare operational metrics, such as staffing and maintenance burden. The Trust for Public Land's Park Score index reflects these trends by assigning points based on acreage, investment, amenities, access, and equity. Its investment and amenity metrics also consider per resident spending and available facilities.



NRPA Park Metrics | Research | National Recreation and Park Association | NRPA

Equity-focused LOS Trends

Current best practices emphasize that LOS should account for underserved populations, spatial equity, and equitable access to both parks and park quality. The ParkScore report supports this by highlighting how investment, access, and distribution trends evolve over time, noting that residents of larger cities increasingly rely on parks for connection, well-being, and community togetherness.

Holistic Assessment of Publicly Accessible Parklands

When assessing park distribution, the Trust for Public Land takes a more holistic approach by evaluating all publicly accessible parks, trails, and open spaces regardless of ownership. Today, cities recognize that people often do not distinguish between city parks, state parks, or school play areas. Instead, people perceive all of these as part of the public realm. The publicly accessible parks may account for:

- City-managed parks
- County parks or open spaces
- State or federal lands
- School district playfields
- Nonprofit-managed open spaces
- Other publicly accessible green spaces

ParkScore® index

ParkScore® 2025 Scoring Metrics - Trust for Public Land

These methods are useful for examining a more complete understanding of distribution, proximity, and service gaps.

Considerations for Vancouver

Vancouver's park classifications adequately reflect existing conditions and provide distinction for park types currently seen across the city; however, as Vancouver continues to grow and strive for a higher LOS, additional consideration should be given to park types and intended purpose, park hierarchy, acquisition and development standards, and PIF program updates.

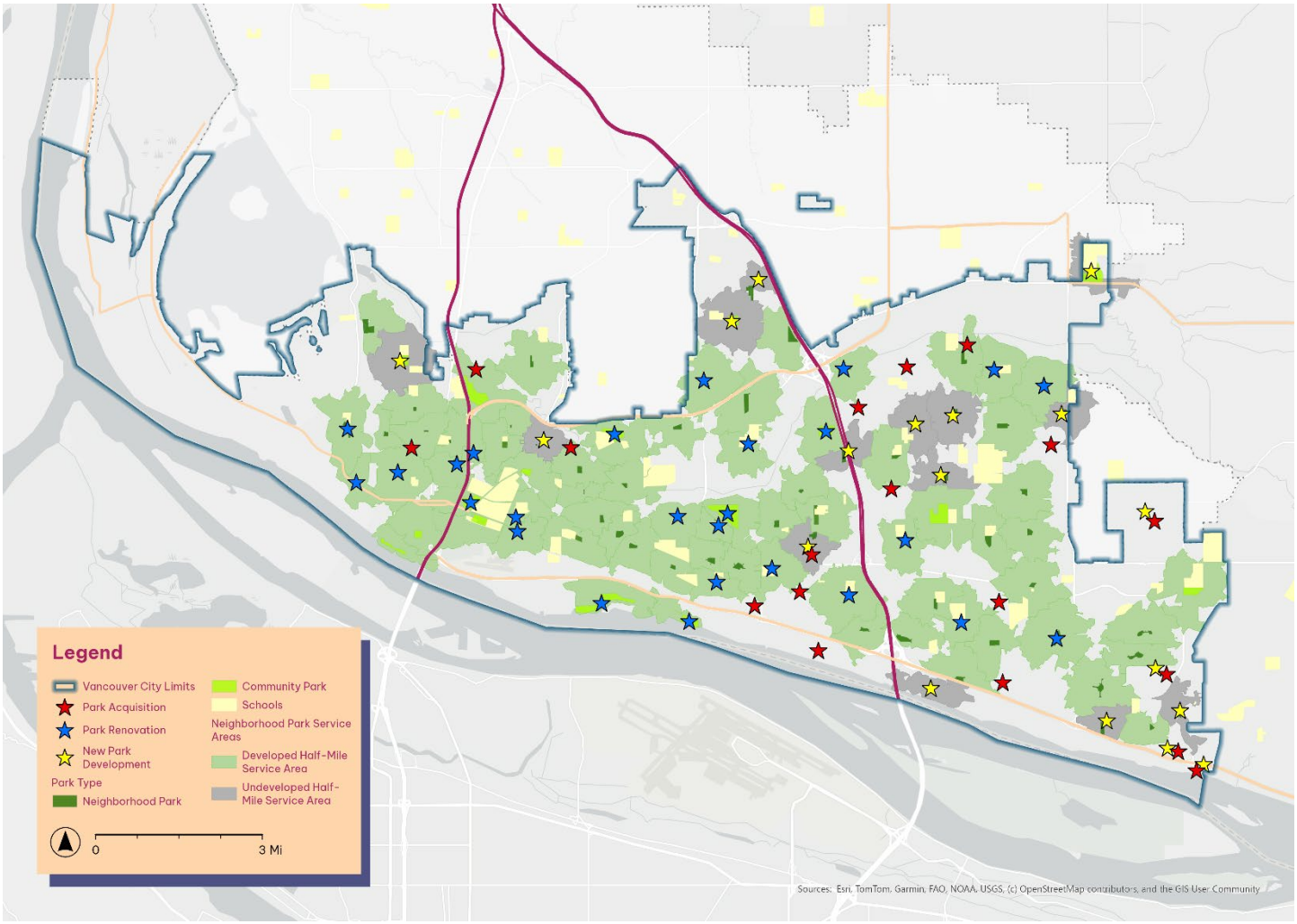
Based on peer communities in Washington and across the United States, Vancouver should explore the following:

- Enhanced focus on ecological value of property in planning efforts.
- Park hierarchy will need to be addressed as new park classifications are added. Vancouver should consider adding more detail to the Linear Parks classification that reflects how these spaces should function in contribution to the park system.
- Based on the *Our Vancouver* park system need cost analysis, consider adoption of proposed minimum standard of 1 acre per 30,000 residents for Civic Plazas. Additional standards for Community Centers, Regional Trails and Sports Complexes should also be considered. An updated nexus study should be conducted to affirm proposed standards are compliant with state regulations.
- Current PIFs (2025 rates) are estimated to support only 30 percent of the actual cost of acquisition and development. This deficit is anticipated to grow due to inflation and the use of PIF waivers. Consideration should be given to increasing PIF rates to generate a proportionate share of the resources necessary to adequately serve residential development—in addition to review of incentives for private park development, impact of fee waivers on LOS to low-income areas, and application of program to non-residential development.

Proposed Capital Assets and Acquisition Planning

Vancouver's capital projects use investment and allocated funds to meet the needs of Vancouver's parks and recreation system, based on LOS standards, growth projections, and equity indicators. The planning process for new parkland is data-driven and community-informed, incorporating structured evaluation from feasibility analysis through community input and City Council approval (*VPRCS Comprehensive Plan*, EIS Report).

Figure 25. Capital Facilities Plan Projects Map



Capital Facilities Plan

Vancouver's Capital Facilities Plan (CFP) provides a 6- and 20-year roadmap for capital projects, including major park and recreation investments, as well as the annual Capital Improvement Program (CIP). The CIP identifies near-term project priorities based on system needs, available funding, and coordination with other infrastructure investments. Capital improvements include physical changes to the park system, such as park, trail, or facility upgrades, as well as new parkland acquisition.

Planned Investments

As part of the *VPRCS Comprehensive Plan*, approximately $166 million in planned capital projects are identified between 2022 and 2031. These investments include new park acquisitions, major park renovations, trail expansions, and systemwide accessibility improvements, as Vancouver continues to keep pace with population growth, new development, and environmental changes (*VPRCS Comprehensive Plan*). A minor update to the *VPRCS Comprehensive Plan* is anticipated to occur following the adoption of the *Our Vancouver* plan to reflect policy changes and updates to investment strategies.

East and central Vancouver, along with the Evergreen, Burton, and Fourth Plain Boulevard corridors, have been identified as areas suitable for future investments. These locations are expected to experience increased population growth and higher-density residential development, resulting in a gap in park acreage per capita, as well as a focus on equitable access (Appendix F, Community Atlas Existing Conditions, EIS Report).

Implementation and Funding Sources

Implementation for Vancouver's parks and recreation system is guided by adopted plans, policies and funding tools that align with citywide growth and planning objectives. Funding for implementation comes from a combination of federal and state grants, and partnerships with private and nonprofit organizations. These sources provide a guide for the City to maintain existing facilities, acquire new parkland, and expand recreation facilities.

The City of Vancouver has a variety of funding sources available supporting both capital improvements and ongoing operations, which are further outlined below:

- Dedicated Funding Streams. Cities and counties may allocate dedicated sources, such as property taxes, sales taxes, business license surcharges and impact fees (residential and non-residential), specifically for parks and recreation. These revenues can support both current operations and capital improvements in a stable, ongoing way. The City currently uses impact fees, a business license surcharge, and a local Real Estate Excise Taxes to provide dedicated, ongoing parks funding.
- Bonds and Levies. Bonds and levies may be used independently or in combination. When used together, bonds and levies can finance both the initial cost of improvements and the ongoing resources needed to support them. This combined approach offers a broader range of funding options than using either tool separately and, in most cases, requires voter approval.
    - Bonds are a debt-financing tool that allows jurisdictions to raise money upfront for large capital projects, such as park development or major renovations. Repayment is typically made over time through property taxes or other dedicated revenue streams. In Washington, general obligation bonds usually require voter approval and are repaid through property taxes, while revenue bonds are repaid from specific program revenues (e.g., user fees) and typically do not require a public vote. This type of funding is focused for specific projects and is not necessarily a stable ongoing source of funding for a variety of parks-related capital improvement projects.

  - Levies are property tax measures that raise revenue directly, either on a temporary or permanent basis. They are commonly used to fund park operations, maintenance, or smaller-scale capital improvements. Most levies require voter approval, often through a simple majority or, in some cases, a supermajority with minimum turnout thresholds.
- Park and Recreation Districts. Washington law authorizes the creation of park and recreation districts, service areas, and metropolitan park districts. These permanent entities may levy property taxes, issue bonds, and generate other revenues dedicated to parks. A guiding principle is that there should be a clear connection between the population served and the taxes or levies imposed.
- Grants. State and federal grant programs can provide funding for park acquisition, development, restoration, and programming. Grants are often tied to specific policy goals, such as conservation or community health, and supplement local revenue sources rather than providing ongoing funding.
- Tax Increment Financing. The Tax Increment Financing districts capture increases in property tax revenue generated by new development within a designated area. The incremental revenue can be directed to fund a variety of infrastructure investments, including park facilities, often as part of broader subarea plan implementation and associated redevelopment efforts. The City of Vancouver currently does not have a Tax Increment Financing district but is actively studying their applicability to priority redevelopment areas in the city.
- Other Revenue Strategies
  - User Fees and Charges: Fees for activities, such as sports leagues, equipment rentals, or special events, can generate revenue to help offset operational costs. These fees are typically structured to recover a portion of costs while maintaining access for a broad range of users. They do not typically generate revenue for parks system improvement or expansion.
  - Fundraising, Advertising and Naming Rights: Donations from individuals, foundations, or businesses, as well as organized fundraising efforts such as capital campaigns or crowdfunding, can provide additional support for parks projects. These sources are generally project-specific, vary in scale and do not provide ongoing funding.

In addition, the City recently adopted a 0.1% sales tax increase through a Cultural Access Program establishes a dedicated funding source to strengthen community access to arts, culture, science, and heritage programming. This funding may be used to expand arts education, support local cultural organizations, and increase opportunities to participate in cultural experiences across the city.

Culture, Arts and Heritage

Cultural spaces and programming are essential to Vancouver's uniqueness and sense of place, functioning as an interconnected system that supports community life. As described in the City's Culture, Arts & Heritage Plan, Vancouver is home to a growing and evolving cultural ecosystem that includes artists, cultural organizations, educational institutions, historic sites, and public spaces that together contribute to the city's identity, vibrancy, and quality of life. These culture, arts, and heritage functions are supported and coordinated through the City's Parks, Recreation, and Cultural Services department, which plays a key role in delivering programs and stewarding public spaces. Parks and public facilities provide accessible, everyday venues where culture and creativity are experienced as part of daily life (see goal CE-1).



Public art being unveiled at the corner of Evergreen and Broadway in Downtown Vancouver.

A robust arts and cultural ecosystem is defined not only by the presence of venues, but by the capacity, programming, and space needed to support cultural activity citywide. This includes expanding opportunities for performance, exhibition, education, and informal creative expression across a network of spaces—such as parks, plazas, community centers, libraries, commercial spaces, and streets—while also addressing identified community needs for arts funding, organizational capacity, and dedicated cultural space. Integrating arts and culture into public infrastructure and neighborhood spaces strengthens social connection, fosters creativity, and reinforces Vancouver's distinct identity and sense of community pride (see CE-5).

In addition to strengthening community identity and social connection, access to arts and cultural experiences contributes to improved physical, mental, and emotional well-being. Research shows that engagement with the arts can reduce stress, support cognitive health, and foster a sense of belonging and purpose. Public art integrated into parks, streets, and civic spaces enhances the everyday environment, creating more inviting, walkable, and restorative places that encourage outdoor activity and social interaction. Communities with abundant and visible arts and cultural opportunities are better positioned to support overall quality of life, contributing to healthier, more connected, and resilient populations.



In 2023, the City acquired the former Community Library Building at Mill Plain and Fort Vancouver Way, and developed it into the Community Art Hub, a space that hosts a wide variety of cultural events, classes, workshops and rehearsals, helping the local arts ecosystem to flourish.

As Vancouver grows and becomes increasingly diverse, expanding equitable access to cultural experiences remains essential. Culture—expressed through language, traditions, art, and shared experiences—reflects the everyday life of the community and helps build connections across differences. Investing in arts and cultural infrastructure and programming, particularly in underserved areas, supports inclusive participation, cross-cultural exchange, and opportunities for residents of all ages and backgrounds to engage in creative expression.

Partnerships are central to sustaining a thriving cultural ecosystem. The City plays a key role as a convener and partner—working with cultural organizations, Indigenous communities, schools, businesses, and community groups to expand access to arts education, programming, and cultural space. Consistent with the Culture, Arts & Heritage Plan, this collaborative approach helps build cultural capacity, support local artists, and integrate culture, arts, and heritage into the daily life of Vancouver's residents, while also contributing to economic vitality, tourism, and overall community well-being.

Goal: PR-1 Increase Community Health through Recreation

Vancouver has safe and equitable access to a quality and diverse system of parks, natural areas, amenities, recreational facilities and programs that promote physical and mental well-being, cater to the varied interests and needs of community members, and contribute to a vibrant and active community.

Vancouver's parks and recreation system will support the health of the community by creating opportunities for play, connection, engagement, and creative expression. Currently, Vancouver's parks, trails, and facilities are inclusive places to engage in physical fitness, mental well-being, and social belonging. Through intentional design and equitable distribution, Vancouver's diverse system will enhance quality of life throughout the city, connecting neighbors and nature.

Recreation is a core public service that enriches the city's livability and resiliency. Vancouver's recreational programs offer lifelong health by encouraging outdoor activity, building intergenerational relationships, and supporting inclusive events that celebrate Vancouver's diversity. Vancouver's facilities are designed and operated to be inclusive, accessible and responsive to the needs of the community.

Community health and well-being for all ages and abilities are an important part of Vancouver's outdoor plan and recreation. According to Appendix F, Community Atlas (2023), one in five residents is under 18, and nearly 15 percent are over 65, emphasizing a need for more intergenerational recreation opportunities. Youth programs provide safe and structured spaces for play, learning, and teamwork, while senior and adaptive recreation programs promote mobility, connection, and mental wellness.

Looking at both local and national trends, access to recreation and green spaces reduces the risk of chronic diseases and improves mental health, strengthening the City's dedication to inclusive and equitable recreation access (*VPRCS Comprehensive Plan*, EIS Report).

The supporting policies with this goal will support investment in recreation programs, facilities and public spaces that promote physical activity, mental well-being, and social connection for people of all ages and abilities. The policies emphasize equitable access through universal design, inclusive programming, and programs and infrastructure that support youth, aging populations, and underserved communities. While there is an emphasis on equity and a sense of place, the policies also prioritize the coordination of capital investments to align with health and equity objectives.

Supporting Policy	Description	No.	Related Goals
Asset Management	Manage City assets to balance full life-cycle costs, performance, risk, and service levels, using BMPs and data. Public infrastructure and facility investments will leverage existing investments to support efficient and equitable growth.	**21**	PFS-2, TM-1, PR-1
Climate Resilient Spaces	Incorporate elements of climate resiliency into new public spaces, buildings, and infrastructure.	**29**	CL-1, CE-1, PR-1, PFS-3, LU-3
Incorporate Universal Design Principles	Incentivize universal design principles in private development. Support accessibility retrofits for existing homes and prioritize affordable housing options tailored to multigenerational living, aging in place, and a wide range of abilities.	**74**	EI-2, PR-1, H-2

Goal: PR-2 Parks, Trails, and Natural Spaces

Vancouver's residents have access to a well-connected and expanded network of developed parks, trails and natural areas that support outdoor recreation, mental and physical health, biodiversity, and climate resilience, reflect the cultural and economic value of the community, and serve as vital hubs for community gathering.

Vancouver's parks, open spaces, and trail network connect people to the outdoors, strengthening the city's environmental health, recreation opportunities, and social vitality. Land acquisition and preservation efforts ensure that environmentally sensitive areas are protected, and new parks and open spaces expand in line with the city's population growth.

As Vancouver continues to grow, capital investments will focus on linking parks and communities, improving connectivity and access for walking, biking, and active transportation. Expanding trail networks and greenway corridors will help address service gaps and promote equitable access to outdoor spaces, particularly in east and central Vancouver, where access to parks and trails remains limited. Natural areas also play a critical role in the City's climate adaptation strategy. Vancouver's park lands and natural areas offer community health benefits. Increasing urban tree canopy mitigates heat island effects and flooding. According to the Community Atlas (2023), neighborhoods with higher canopy coverage and access to natural spaces have better public health outcomes and greater climate resilience. The policies associated with this goal support the expansion and maintenance of Vancouver's connected network of parks, trails, and open spaces that provide environmental, recreational and social benefits. There is a strong emphasis on climate resilience, preservation of sensitive lands, and creation of community streets and green corridors that bring nature into the urban environment. This goal also calls for exploring methods to activate underutilized sites throughout the city and have them contribute productively to our existing network of parks and open spaces. This approach is intended to complement—not replace—ongoing investment in existing parks and open spaces by strategically identifying underutilized sites,

particularly those at risk of blight or public safety concerns, where activation can deliver additional community benefit.

Supporting Policy	Description	No.	Related Goals
Acquire Land for Public Parks	Acquire and reserve land for the development of parks for public use and recreation in areas experiencing growth, prioritizing underserved neighborhoods and areas currently not meeting parks service standards.	**7**	LU-3, PR-2
Community Safe Routes	Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.	**33**	TM-1, TM-2, PFS-3, PR-2, CL-3
Community Streets	Develop guidance and encouragement for community use of the right-of-way, including plazas, parklets, "streateries," open streets events, public art, converting some low volume roadways into pedestrian only thoroughfares, and other demonstration projects.	**34**	TM-1, TM-4, PR-2
Conserve Land for Open Space and Environmental Preservation	Acquire environmentally sensitive land with ecological benefits for the purpose of conservation.	**35**	PR-2, CL-2
Improve Connectivity between Parks and Open Spaces	Create an expansive network of linear parks that encourage active transportation, improve community health and well-being, enhance tree canopy and stormwater management, and link parks and open space with housing.	**68**	PR-2, PFS-1,
Pilot Projects	Encourage the use of short-term pilot projects for park, transportation, and general infrastructure improvements before making long-term investments to foster innovation, test feasibility, and increase community buy-in.	**102**	CE-4, PR-2, TM-2, CL-1

Supporting Policy	Description	No.	Related Goals
Pollinator Habitats	Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide free landscaping, removal and reducing use of invasive species, enhancing biodiversity, and connecting natural spaces across the city though pollinator-friendly plantings.	**103**	CL-2, PR-2, PR-3, CL-4
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the city's identity, economy, history, and future.	**104**	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Program Underutilized Spaces	Encourage the thoughtful reuse and activation of underutilized lands—such as space beneath freeway viaducts, oddly shaped parcels, utility corridors, temporarily vacant lots, and other non-developable remnants typically under 1 acre—by establishing public-private partnerships to program them to serve community, cultural and environmental needs.	**106**	CE-1, CE-4, LU-4, PR-2
Regional Trail and Open Space Networks	Work with nonprofit and private partners, Clark County and adjacent cities to build out the regional trail network for recreation and active transportation purposes.	**123**	TM-1, PR-2, CL-2
Strategic Reuse of Excess Right-of-Way	Analyze suitability of excess and unneeded ROW for adding tree canopy, native planting, nature spaces, and stormwater management systems.	**137**	CL-1, CL-2, LU-3, CL-4, PR-2
Sustainable Parks Funding	Identify and implement new funding strategies to support robust parks and natural area investments, ongoing maintenance and operation costs, and provide equitable access and LOS to all community members.	**152**	PR-2

Goal: PR-3 Community Health and Wellness

Vancouver community members have access to high-quality public spaces that support physical and mental well-being, active lifestyles, connection to nature, and sense of community belonging.

Vancouver's parks and recreation system connect residents to spaces and programs that encourage active living, stress reduction and social connection. Parks, community centers and recreation facilities function as part of the city's broader wellness network, providing inclusive environments that support physical and mental well-being and complement other community health services.

This goal helps address these benefits and recognizes neighborhoods within the city with higher rates of food insecurity and chronic disease, particularly in areas with limited access to fresh produce and outdoor recreation opportunities. Addressing these disparities requires a coordinated approach that integrates park amenities, community gardens, and wellness programming into everyday public spaces (Appendix F, Community Atlas, 2023).

In collaboration with the *VPRCS Comprehensive Plan (2022–2031)*, there is a need for continued investment in programs that promote lifelong wellness, including fitness classes, adaptive recreation, nature-based therapy, and nutrition education. Partnerships with local health providers, school districts and nonprofit organizations can help extend these opportunities.

Exposure to green spaces has also been proven to lower stress, improve concentration, and encourage a sense of social belonging, benefiting youth, older adults, and residents who experience higher health risks. Policies supporting this goal emphasize collaboration among parks, health, and social service partners to increase community wellness and provide equitable high-quality public spaces.

Supporting Policy	Description	No.	Related Goals
Broaden Equitable Access to Natural Spaces and Parks	Increase equitable access to natural spaces and parks by investing in new and improved facilities in underserved neighborhoods and siting new accessible housing close to existing and future parks.	**23**	CL-4, PR-3, H-1, EI-2
Community Centers	Establish multipurpose community centers offering social, recreational, educational, and cultural programming, especially in underserved areas.	**30**	PR-3, PFS-1
Community Food Enterprises	Explore opportunities for community-owned and cooperative grocery store models to strengthen neighborhood food access where the private market fails to meet demand.	**31**	PR-3, LU-1
Community Gardens	Expand access to community gardens and incentivize urban agriculture to improve food security and increase healthy food options.	**32**	PR-3
Health Access	Broaden access to essential healthcare and services for underserved populations and address built environment causes of health disparities.	**65**	EI-1, PR-3
Increase Food Access	Incentivize and remove regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods.	**78**	PR-3, LU-1

Supporting Policy	Description	No.	Related Goals
Native Landscapes	Incorporate native plantings, food forests, and agroforestry into parks and public spaces to support food security, ecological health, and cultural knowledge sharing.	**94**	PR-3, CL-2, EO-3
Pollinator Habitats	Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide free landscaping, removal and reducing use of invasive species, enhancing biodiversity, and connecting natural spaces across the city though pollinator-friendly plantings.	**103**	CL-2, PR-2, PR-3, CL-4
Support Mental Health Access	Explore partnerships to expand access to culturally inclusive mental health, behavioral health, and physical health resources.	**148**	PR-3, EI-1

Goal: PR-4 Thriving Cultural Landscape

Vancouver supports a thriving cultural landscape for residents and visitors by investing in public art, cultural centers and facilities, historic preservation, and supporting community centered initiatives and opportunities for creative expression that reflect the city's diverse identities and historic roots.

Cultural spaces, parks, and public facilities are essential to Vancouver's uniqueness and sense of place. The park system provides community gathering spaces for creative expression and cultural learning that strengthen social connections. The City's cultural programs honor Indigenous heritage, highlight local artists, and promote diverse community voices through events, exhibits, and performances that reflect Vancouver's evolving character.

As Vancouver continues to grow, its population becomes increasingly diverse, with cultural heritage and multilingual communities shaping the city's neighborhoods and public life (Appendix F, Community Atlas, 2023). Expanding access to cultural programming and facilities helps create shared experiences across generations and cultural groups, particularly in areas where residents have fewer opportunities for arts engagement.

Ongoing collaboration with schools, cultural organizations, local artists, and community-based groups helps extend the reach of arts education and programming, while supporting creative activity in both established and emerging spaces. Efforts to preserve and interpret historic and cultural resources further reinforce community identity and provide opportunities for learning and reflection.

Policies supporting this goal prioritize collaboration among cultural organizations, Indigenous partners, and community groups to advance arts education, heritage preservation, and equitable access to cultural experiences.

Supporting Policy	Description	No.	Related Goals
Access to Arts and Cultural Programs	Improve access to arts, cultural and heritage programs by reducing barriers to participation, prioritizing underserved and historically underserved communities, and investing in related programs.	**1**	EI-1, PR-4
Center Impacted Voices in the Development of Community Spaces	Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design and programming of community spaces.	**26**	CE-1, CE-5 EI-1, EI-4, PR-4
Culturally Responsive Design	Develop standards for public spaces and buildings that incorporate culturally specific design principles and art installations and reflect the diverse history and heritage of Vancouver communities.	**41**	CE-5, CE-2, PR-4
Event Programming	Continue to support and expand local gatherings, festivals and special events that uplift community, reflect diverse histories and lived experiences, and create a sense of civic pride.	**56**	CE-1, CE-5, PR-4
Expand Representation in Public Art	Ensure publicly funded art projects and installations reflect and incorporate the experiences of historically excluded and underrepresented voices in the physical and cultural landscape of the city.	**57**	CE-5, CE-2, PR-4
Fort Vancouver and the Historic Reserve	Protect and promote Fort Vancouver and the Historic Reserve as nationally significant cultural and historic assets. Support public investment, inclusive programming, and heritage-based economic development. Oppose efforts to reduce funding or public accessibility.	**61**	PR-4

Supporting Policy	Description	No.	Related Goals
Historic and Culturally Significant Resources	Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, protection, and rehabilitation of historic and architecturally significant structures, and heritage trees.	**66**	CE-5, CL-1, CL-2, PR-4
Increase Access to Space for Artists and Creatives	Establish partnerships that increase access to shared, affordable spaces serving artists and arts and cultural organizations.	**76**	CE-1, PR-4, CE-5
Increase Cultural Capacity	Strengthen Vancouver's cultural sector by investing in capacity building across arts, culture and heritage organizations as an economic and cultural driver of the community.	**77**	PR-4
Support Locally Made Products and Art	Support and elevate Vancouver's local makers, artisans, and creative production sectors by promoting the use of locally sourced and recycled materials, strengthening small-scale manufacturing, and advancing a circular economy that contributes to community pride and place-based identity.	**147**	CE-5, EO-3, PR-4

Chapter 7 - Key Implementing Actions

- ✓ Develop a Comprehensive Parks Funding Strategy.
- ✓ Reevaluate Parks Level of Service (LOS) standards to align with the Comprehensive Plan.
- ✓ Reevaluate Park district boundaries.
- ✓ Reevaluate and update the Park Impact Fee (PIF) program, including adding a commercial PIF, and update relevant technical documents.
- ✓ Identify minor updates to the Parks Comprehensive Plan to align with the citywide Comprehensive Plan and updated Climate Action Framework.
- ✓ Continue strategic parks capital investments guided by the Parks, Recreation, and Cultural Services Comprehensive Plan.
- ✓ Refine community recreation offerings to support community health and connectedness within the City's cost recovery policy.
- ✓ Develop a citywide strategy for managing natural systems in support of climate goals.
- ✓ Advance the Arts Hub project.
- ✓ Expand implementation of the Arts, Culture, and Heritage Plan with approved cultural access funding.

Transportation & Mobility.



8



OUR VANCOUVER

Introduction

Vancouver's transportation system reflects historic development patterns that prioritized vehicle movement over multimodal access, contributing to high vehicle dependence, safety risks, and gaps in pedestrian, bicycle and transit networks. Much of the policy work undertaken by the City over the last decade aims to address these conditions, improving access to opportunity, and advancing safety and climate goals. This chapter relies heavily on the 2024-2044 Transportation System Plan (TSP). The TSP was developed over the course of three years and formally adopted by City Council in January 2024. Development of the TSP included extensive outreach and coordination between City staff and City Council, the Transportation and Mobility Commission, a technical advisory



Vision: Transportation and Mobility

In Vancouver, transportation is safe and accessible for everyone, regardless of where they live or their socioeconomic status. We commit to building an equitable and connected network of streets, paths and trails that are safe and comfortable for people walking, driving, rolling, using small mobility devices and taking transit. By prioritizing reliability and frequency, our public transportation system allows people to move around the community easily and safely. We embrace multi-modal options such as bicycles and small mobility devices like scooters and commit to breaking down barriers and removing financial obstacles to using these travel options. Through strategic partnerships, we will establish integrated transportation hubs, fostering safe, climate-friendly, and accessible pathways to essential resources and opportunities in Vancouver and across the region.

committee, and community members. Though adopted in early 2024, the TSP may undergo a minor update after completion of the Comprehensive Plan to ensure alignment with the goals and policies of this chapter and account for and integrate the City's updated growth concept. The TSP is adopted by reference and referenced frequently to fulfill requirements of the GMA. The TSP is included in Appendix A, Transportation System Plan.

The TSP includes its own goals, policies and programs that work in coordination with and are informed by the Comprehensive Plan goals, policies, and implementation actions.

Transportation System Plan Goals

The TSP's vision and goals guide future transportation investments and align resource allocation to community values, and align with and complement the goals and policies of the Comprehensive Plan. The primary plan goals of safety, equity and climate align with City Council's priorities for the city. The remaining three goals focus on transportation choice, regional connectivity, and maintaining City assets.

Transportation System Plan Big Ideas

The TSP organizes its policies and programs under the framework of six 'big ideas' that reflect community-supported values. The TSP goals set the vision and the big ideas define how to get there. The TSP big ideas align with and complement the goals and policies of the Comprehensive Plan, as shown in Table 23.

Table 23. Transportation System Plan Big Ideas and Comprehensive Plan Goals

TSP Big Idea	Complementary Comprehensive Plan Goal
Support Thriving Neighborhoods. Make walking and rolling, small mobility, and transit options convenient for neighborhood travel.	LU-1 Connected and Accessible Neighborhoods: Vancouver neighborhoods are places where community members can walk, bike, or roll to a diverse mix of community and open spaces, services, retail, fresh food, healthcare, and educational opportunities and amenities within 15 minutes or less (quarter mile).
Create **complete corridors** that connect growth areas, support business, serve transit, and maximize safety. AND **Connect people to transit**. Fill sidewalk gaps, add safe crossings, and support speed and reliability projects that keep transit moving efficiently.	TM-1 Integrated Transportation and Connectivity: Vancouver is served by a reliable, frequent, and accessible transportation system that seamlessly connects residents to key areas of the city and the region.
Build low-stress networks. Make the walking, rolling, bicycling, and small mobility networks inviting for all ages and abilities.	EI-2 Universal Design and Access: Public spaces, infrastructure, information platforms and public and private buildings are universally

TSP Big Idea	Complementary Comprehensive Plan Goal
	designed and meet best practices for accessibility and inclusion.
Make growth a benefit for all. Manage growth by leveraging investments from new development and use parking and demand management policies to support livability.	EO-4 Inclusive and Community-centered Economic Growth: Economic growth provides benefits and opportunities to all community members, supports upward mobility, and provides opportunities for wealth creation.
Embrace the future. Adopt new technologies and track data to help meet our goal of carbon neutrality by 2040.	CE-4 Innovation: Vancouver community members are empowered to explore creative solutions, innovative methods, entrepreneurship, calculated risk-taking, and bold solutions that drive progress, address systemic inequities, and improve quality of life within neighborhoods.

Community Feedback

- Desire for land use and transportation to be coordinated so that transit and active transportation options are near housing, jobs, parks, and essential services.
- Concerns about vehicle traffic safety and congestion, including noise and air pollution, speeding, unsafe crossings, industrial traffic, potholes, and the need for traffic calming.
- Strong support for active transportation options—walking, biking, and micromobility—and desire for more sidewalks, curb ramps, protected bike lanes, greenways, and access to scooters/bike share.
- Strong demand for expanded, reliable transit service, including more bus routes, fast and frequent service, and regional connections, especially among younger community members.
- Transit must be accessible, safe, and comfortable, including better stop amenities (shelters, lighting) and a welcoming and secure space.
- Mixed views on parking and how much land should be dedicated to it—some think parking takes up too much space, others fear losing parking near homes and businesses.
- Make sure freight can move efficiently while mitigating negative impacts on neighbors and other transportation options.

Existing Transportation System and Framework

Vancouver's transportation system is a part of a regional network in southwest Washington and across the Columbia River to Portland and surrounding cities. The City coordinates with Clark County, neighboring cities, Washington State Department of Transportation (WSDOT), C-TRAN, the

Southwest Washington RTC, and the tri-county Metro Regional Government in Oregon to facilitate updates to Vancouver's transportation network and assess land use assumptions. The sections below describe the city's street network and transportation programs and tools used to assess the effectiveness and efficiency of the transportation system.

Street Network

The city's street network is the backbone of the transportation system. City streets and sidewalks account for nearly 20 percent of Vancouver's total land area—approximately four times the land dedicated for parks. The TSP provides an inventory of modal networks throughout Vancouver, including walking and rolling, bike and small mobility, enhanced transit corridors, and freight corridors, as well as overlap of these networks.



The modal networks, described below, provide a policy framework and a roadmap for capital investment. Full maps are available in the TSP Networks chapter of the TSP (Appendix A, Transportation System Plan).

The Pedestrian, or "Walking/Rolling Network" identifies pedestrian corridors and pedestrian centers. Pedestrian corridors represent places where high levels of walking or rolling are expected.

- **Primary Pedestrian Corridors** include a transit route or routes, provide a continuous east-west or north-south connection, include major multi-use paths, and/or connect to the interstate bridges.
- **Secondary Pedestrian Corridors** connect to schools and parks and fill gaps in the network.

The Bicycle and Small Mobility (BSM) Network aims to provide low-stress transportation facilities within a half mile of all residents that can safely accommodate a variety of users. The facility type required to feel safe and attractive to various users is dependent upon the roadway characteristics it is located on.

- Facility types that make up the BSM Network include protected or buffered bicycle lanes, multi-use paths, unpaved trails, striped bike lanes, and neighborhood greenways.

The Enhanced Transit Network consists of enhanced transit corridors where the City will focus on supporting access to transit and transit priority.

- Corridors were identified based on existing and planned frequent service, equity considerations and growth centers.

The Freight Network includes existing critical freight corridors, which consist of the federally designated National Highway Freight Network and Truck Freight Economic Corridors, as well as Freight Access Streets, which are designated by the City based on local freight volumes.

The Roadway Network is defined by local, regional and federal functional roadway classifications. The Vancouver public roadway functional classification is defined in Title 11 of the Vancouver Municipal Code (VMC).

In addition to the street network, Vancouver's transportation network also includes Pearson Field Airport, a general aviation airport located directly east of I-5 and just north of State Route 14 and the Columbia River. The airport is operated by the City of Vancouver, which owns 61.8 acres of the airport site. The remaining 72.6 acres are owned by the National Park Service and located within the Vancouver National Historic Reserve.



Concurrency and Multimodal Level of Service

The GMA requires cities to adopt concurrency standards and ensure transportation projects, programs, and services needed to serve growth are regionally coordinated and in place either at the time of development or within six years. This occurs through coordination of the transportation system and the adopted land use map and assessment of LOS. The TSP also calls for a shift to a more multimodal approach in measuring concurrency (a measure of transportation system capacity to support development) that measures LOS for travel modes beyond just vehicles.

The City of Vancouver Multimodal Level of Service (MMLOS) will measure network completeness and level of traffic stress (LTS). The network completeness assesses the existing facility against its prescribed facility type based upon the 2024-2044

Equity Lens

Historically, Vancouver and many other Washington cities have measured capacity using auto performance metrics, such as peak hour vehicle speed and intersection throughput. This autocentric approach hindered broader improvements to the multimodal system and focused on those who primarily drive to get to where they need to go. The revised concurrency policy measures conditions and performance of all modes, including walking, biking, transit and vehicles.

TSP[44] modal networks. The prescribed facilities are determined by the roadway speed, traffic volumes, and adjacent land use to ensure that pedestrians, bikes and small mobility users have LTS 1 or 2[45] on the primary and secondary modal corridors. For transit, the City will invest in transit supportive infrastructure and design on the Enhanced Transit Modal Network to support speed, reliability and quality infrastructure for transit riders. The City adopts C-TRAN's MMLOS standard for the local and regional system.

- Local System
  - Routes: Service frequency LOS B (30 min headway) or better
  - Transit stops: Accessible path is LTS 1 or 2 and stop completeness (assess existing facilities against C-TRAN Amenity Standards)
- Regional System
  - Routes: Reliability LOS B or better
  - Transit stops: Accessible path is LTS 1 or 2 and stop completeness (assess existing facilities against C-TRAN Amenity Standards)

In order to bring transportation facilities and services to the established MMLOS, the City will pursue programs and policies from the TSP, such as the Complete Corridors program, leverage development with traffic impact analyses and the traffic impact fee (TIF) program, and the safe routes to school program, in addition to the goals and policies of this plan. The TSP addresses MMLOS in Policy CC2.2, Multimodal Concurrency Standard: *Update concurrency requirements to ensure that developments and capital projects consider multimodal impacts and contribute to mode shift*.

The City is required to adopt LOS for both Highways of Statewide Significance (HSS) and Highways of Regional Significance (non-HSS) as determined by the State and Regional Transportation Council. In Vancouver, HSS include I-5, I-205, SR-14, and SR-501 between I-5 and the Port of Vancouver. Highways of Regional Significance in Vancouver include segments of SR-500. In Clark County, WSDOT has established a LOS 'C' for rural HSS and 'D' for urban HSS facilities. The RTC Board adopted LOS 'E' or better for non-HSS urban highway facilities and LOS 'C' or better on rural non-HSS facilities. More information on these standards can be found in the Clark County Regional Transportation Plan, adopted in 2024.

Table 24. Level of Service Standards for Highways

Facility	Designation	Level of Service (LOS)
I-5	HSS	C (rural), D (urban)
I-205	HSS	C (rural), D (urban)
SR-14	HSS	C (rural), D (urban)
SR-501	HSS	C (rural), D (urban)
SR-500	Non-HSS	C (rural), E (urban)

[44] Vancouver Moves: Transportation System Plan
[45] Level of Traffic Stress

Active Transportation

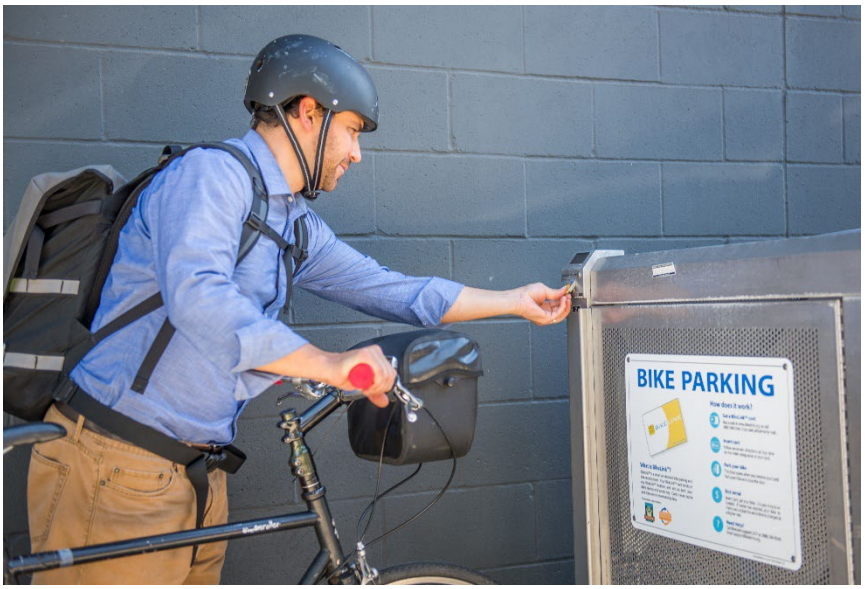


Active transportation is an integral part of the city's transportation system. The TSP includes two big ideas that support active transportation in Vancouver. One of the TSP's big ideas is to "**create complete corridors**" that connect growth areas, support businesses, serve transit, and maximize safety. The city's arterial network (which includes streets like Mill Plain Boulevard, 112th Avenue and Andresen Road) acts as the backbone of its transportation network. They service major destinations, typically have transit service, and are often the most direct route with high demand for travel. These corridors are also fast, wide, and have the greatest number of crashes. Rethinking how the City plans, designs and measures success on these streets is necessary to have a safe and comfortable pedestrian and bike and small mobility network.

The second applicable big idea is "**build low-stress networks.**" The goal is to make the pedestrian and BSM Networks safe and inviting for all ages and abilities. The BSM Network today consists of lower-stress neighborhood streets isolated by higher-stress collector and arterial streets. This makes it challenging to bike outside of neighborhoods and specific corridors and reduces access to key destinations and opportunities. Sidewalks are missing on 9 miles of arterial streets—the fastest and most daunting places to walk or roll. Adopting a citywide low-stress network for BSM and walking and rolling must be complemented by policies and programming (wayfinding, education) that further facilitate use of these networks.

Transportation Demand Management

Transportation Demand Management is supported by the TSP's big idea to "**make growth a benefit for all.**" To do this, Vancouver will manage growth by leveraging investments from new development and use parking and demand management policies to support livability. With growth comes the need to update development standards to ensure necessary infrastructure is in place to accommodate new trips. These updates present an opportunity to right-size parking, balancing vehicle accessibility with the need to preserve valuable land for housing, recreation, and other uses. Demand management policies and programs pair well with infrastructure—the design of streets can make it easy to walk, roll, or bicycle while programs incentivize multimodal choices.



Since 2006, the City of Vancouver has managed the Clark County **Commute Trip Reduction Program** on behalf of Clark County. Employers with 100+ full-time employees commuting during peak commute hours must participate. There are 56 affected worksites countywide, reaching about 11,000 employees. The 2025-2029 Commute Trip Reduction Plan's goals include establishing performance measures, developing strategies to reduce employee drive-alone commutes, and alignment with other regional plans.

In February 2025, the "**Downtown Access, Mobility and Parking Plan: Focusing on People**" was approved by City Council. This plan includes three goals: adopt new pricing practices for parking, expand public parking supply through shared parking, and enhance downtown mobility options. The plan includes 16 specific actions—new policies, initiatives or investments—designed to help the City achieve the plan goals. The plan calls for a five-year implementation period.

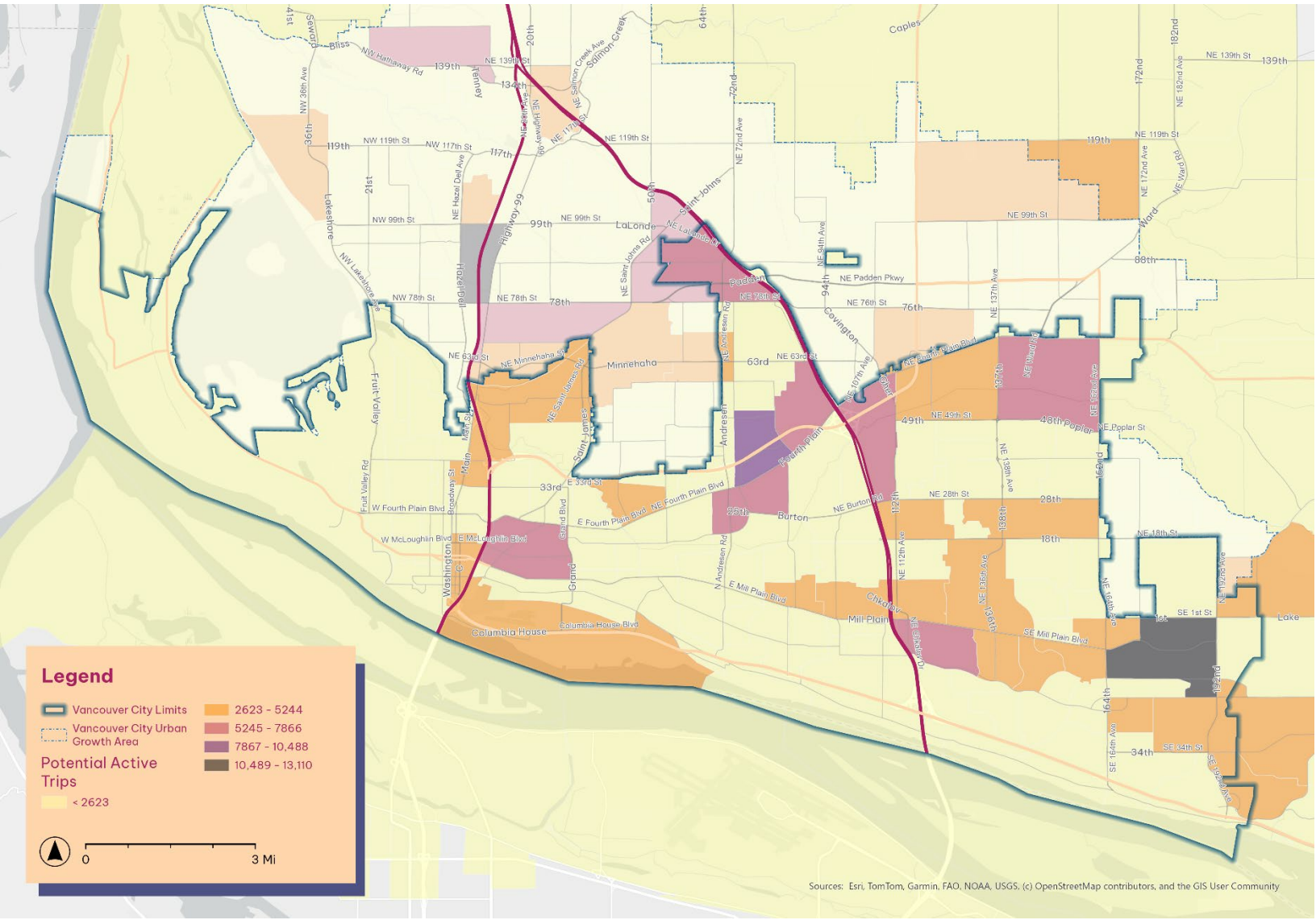
Updating pricing practices in downtown will incorporate demand-driven pricing strategies to create a user friendly "park once" environment that benefits those who drive downtown, encourages people to walk between destinations without moving their car, and maximizes utilization of the on-street parking supply. Enhancing downtown mobility options will provide new options for people to adopt car-free behaviors to get to and around downtown. This will help to reduce demand for car trips between downtown destinations. In the future, pricing strategies can be applied elsewhere in the city where land uses and transportation options make this practicable.

Transportation Forecast

Over the next 20 years, there is strong potential for increasing active transportation trips in every part of the city and region. Over one-third of vehicle trips in Vancouver are less than 4 miles and are, therefore, potential candidates for conversion to active transportation trips. In order to convert motor vehicle trips to active trips and reduce GHG emissions, the City will focus land use and transportation strategies in the areas surrounding Clark College, Vancouver Mall, Walnut Grove, Hewlett-Packard campus/Columbia Tech Center, and the eastern end of SE Mill Plain Boulevard. Figure 26 shows the concentration of short vehicle trips by location, with areas with more of these trips indicating a higher potential for future conversion to active trips. Average daily trips per household are expected to increase very slightly over the next twenty years but some of those trips are expected to convert to active modes if supportive infrastructure, such as sidewalks and protected mobility lanes, is provided. Focusing infrastructure investments in areas where both current and projected active trip potential are high will ensure that these new facilities can be the

most useful to both current and future residents. Additional analysis can be found in Appendix T. Multimodal Evaluation and Active Trip Potential.

Figure 26. Active Trip Potential in Clark County by Census Block Group Origin



Vehicle Miles Traveled

Measuring and projecting VMT provide another way to assess how changes in land use over the next 20 years will affect the transportation system. Growth and development by 2045 will increase VMT to some extent from current conditions. However, VMT per household is projected to be slightly lower by 2045, due to an increase in mixed-use areas that reduce the length and frequency of vehicle trips and allows for mode shift to be more likely. See details in Table 25.

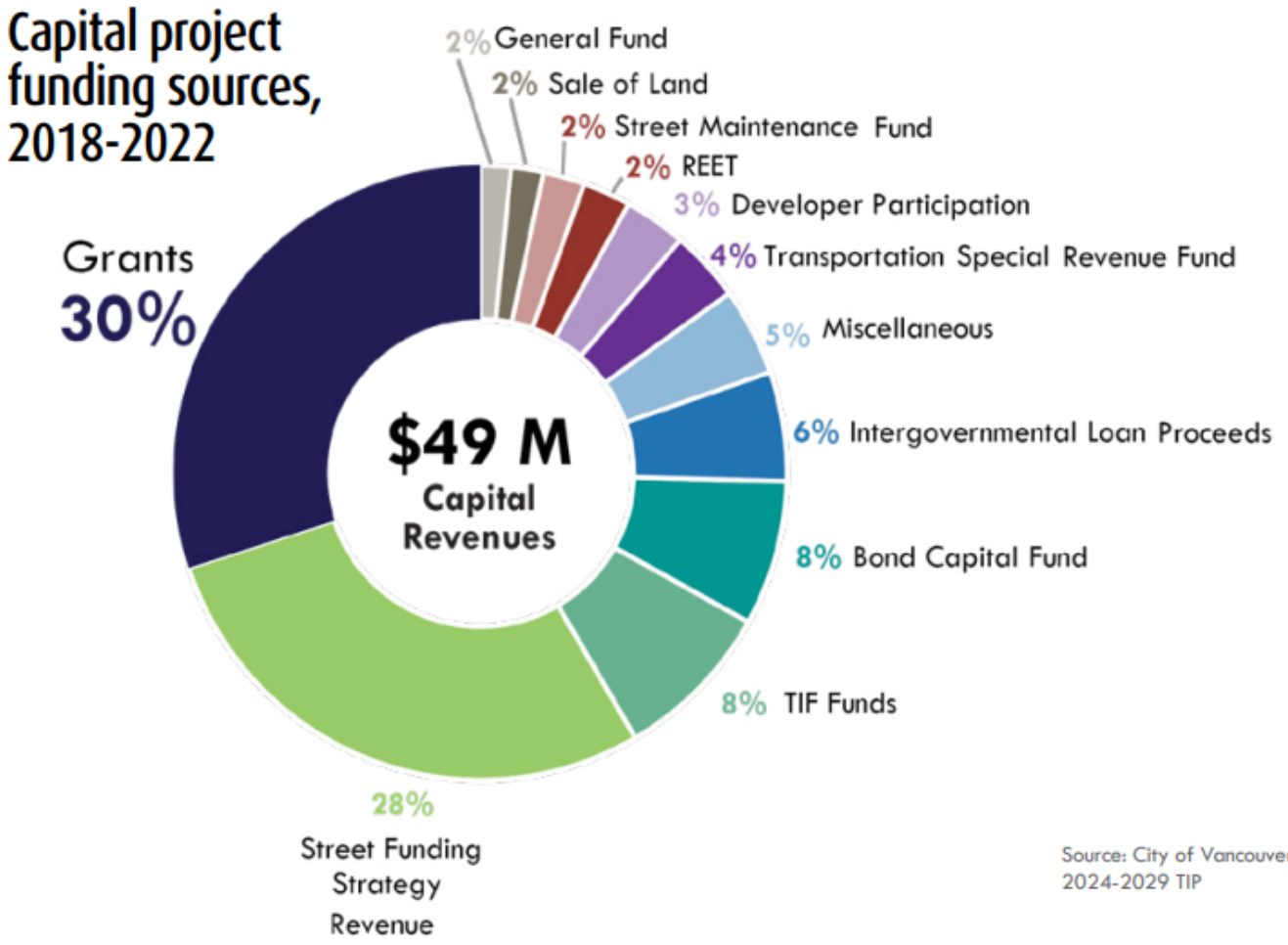
Table 25. Modeled Existing and Future Daily Vehicle Miles Traveled in Vancouver

Vehicle Type	Existing Vehicle Miles Traveled (2023)	Modeled Vehicle Miles Traveled (2045)
All Vehicles Except Trucks	3,949,553	5,356,110
Trucks (in passenger car equivalent)	215,391	549,024
Total	**4,315,718**	**5,905,133**
VMT per household (avg miles per day)	**45.6**	**42.6**

Financial Analysis

Implementing the multimodal network and improving the transportation system to meet the growing need in the city will require substantial capital investments. More than half the funding for transportation capital projects comes from grants or the City's Street Funding Strategy (SFS) (see Figure 27). The City passed the SFS in 2015 as a package of new funding for transportation. It secured revenues from utility taxes and a business license surcharge. A main source of SFS funds comes from designating the city as a Transportation Benefit District (TBD) with the ability to collect a $40 vehicle license fee. SFS makes up more than one-fifth of maintenance revenues and more than one-quarter of capital revenues. City Council further increased transportation funding in 2023 through a TBD 0.1 percent sales tax increase and change to the business license surcharge. This funding source has allowed the City to make significant progress—and will continue to support upgrades to substandard streets throughout the city. Additional transportation funding sources are listed in the TSP Appendix I Funding Memo.

Figure 27. Transportation Capital Project Funding Sources, 2018-2022



The City prepares a Transportation Improvement Program (TIP) annually, which details all the transportation projects planned in the city for the next six years. These projects include planning studies, capital projects like arterial upgrades, pavement management activities, and upgrades to bike lanes, crosswalks, and traffic signals. The TIP offers comprehensive details and funding status for each project. It also provides details on how transportation projects are funded with state and/or federal grants and local dollars. The TIP consists of three different project lists: funded projects, partially funded projects and unfunded projects. Projects on the funded list are considered fully funded for design, right-of-way acquisition, and construction. Projects on the partially funded list have funding for design and/or right-of-way acquisition, but do not have full funding for the construction phase. Projects on the unfunded list do not have any funding allocated to them.

The City organizes transportation-related expenses into three categories: transportation debt, transportation capital and street maintenance. The TIP annually reports on the six-year actual and forecasted expenses and revenue for transportation projects.

Resource Needs for TSP Projects List

The TSP identified a total of 228 capital projects as needed to implement the walking, rolling, and BSM elements. Implementing the TSP requires funding both for design and construction, as well as for staff to manage programs. Capital projects are costly to construct; currently, the City advances active transportation improvements in conjunction with pavement maintenance work when restriping will already occur. Leveraging existing projects and planned maintenance work enables the City's resources to go further in building out the walking, biking and small mobility networks. With limited budgets, the projects are phased over the next 20 years and could be implemented through either expanding the TIP or incorporating it into planned pavement and other projects currently on the TIP. The TIP and CIP are reviewed and updated annually. As part of this annual review, projects will be analyzed and prioritized based on a number of factors, such as impact, safety and cost to determine their priority. Another way to fund and build TSP projects is through TIFs, which are paid by developers and calculated based on how much traffic a new project is expected to generate. Vancouver is currently updating its TIF program to keep pace with the city's rapid development, and to incorporate new MMLOS standards.

Vancouver receives a large portion of capital project funding through grants, but the City could continue to expand efforts into new funding programs. For example, a transportation utility program could levy fees for transportation purposes. Appendix I of the TSP lists additional federal and state grant opportunities that the City could pursue to fund capital projects. Additional details on transportation projects included in the 6-year TIP and 20-year CFP are included in the Public Services and Facilities element.

Americans Disabilities Act Transition Plan

Equal access to information, facilities, programs and civic processes are essential to meaningful participation in community life, yet Vancouver community members continue to experience barriers in access, participation, and decision-making. Vancouver is committed to removing these barriers and to strengthening trust with the disability community. This includes improving the accessibility of existing facilities and services, incorporating accessibility into budget planning, embedding best practices for inclusion into new projects and programs, and ensuring meaningful and accessible opportunities for community input.

The City's Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan (Transition Plan) formalizes this work. It documents the City's evaluation of facilities, policies, programs and practices, identifies barriers to access, and establishes priorities for removal. Members of the disability community were engaged at key stages of the development of the plan and informed findings and recommendations. The Transition Plan guides accessibility improvements, supports long-term compliance planning, and strengthens the City's

Disability By Race

- Overall: **14.7%**
- Hispanic or Latino: **7%**
- White alone: **16%**
- Black: **15%**
- Asian Alone: **9%**
- Hawaiian / Pacific Islander: **12%**
- American Indian / AK Native: **18%**

ability to provide equitable access to all public programs, services, and activities. It was developed in accordance with Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990. Transition Plans are a federal requirement and are adopted by reference into the Comprehensive Plan, and are intended to serve as a working document that is updated when barriers have been removed and when new barriers are identified. Additional details are available in Appendix S. Americans with Disabilities Act (ADA) Transition Plan.

Generations of local disability leaders- including veterans, youth, elders, caregivers, advocates and community organizers- have worked to make Vancouver more accessible, inclusive and responsive to lived experiences of disabled people. The City recognizes this history of leadership and its ongoing responsibility to identify and work toward dismantling barriers to full and meaningful participation in civic life. We are committed to building a community where people of every ability belong and thrive. Our Transition Plan is an important, but by no means only, piece of this work.

Goal: TM-1 Integrated Transportation and Connectivity

Vancouver is served by a reliable, safe and accessible transportation system that seamlessly connects residents to key areas of the city and the region.

Vancouver's transportation system will serve all users by providing multimodal options that get the community to work, school, services, entertainment and shopping reliably and accessibly. Historically, Vancouver's transportation system prioritized vehicle movement over other forms of travel. This plan update and Goal TM-1, in coordination with the TSP, shifts the priority to efficiently moving people. This prioritizes building network connections that will serve not only vehicles, but transit and active transportation modes as well.

A significant portion of Vancouver households, 7.3 percent, do not have access to a vehicle and rely on transit, carpooling, and active transportation modes to get from place to place. Transit services will be frequent and arrive on schedule, serving both those with and without vehicles. People of all ages and abilities will have an opportunity to choose the mode that works best for them, whether that's taking transit, walking, biking, rolling, carpooling, or driving alone. The system will be well integrated with neighboring cities through close coordination between agencies who plan for land use and transportation.

The supporting policies invest in active transportation infrastructure that connects residential and commercial areas, provide connectivity through updated street design standards, and build on the existing trail and open space network to fill gaps. Another key policy supports maintaining assets and the City's existing infrastructure.

Other goals in the plan that advance related outcomes include LU-1 Connected and Accessible Neighborhoods, EI-1 Equitable Community, and PFS-1 Public Facilities and Services.

Supporting Policy	Description	No.	Related Goals
Accessible Mobility for All	Promote universal design standards and mobility solutions for disabled, senior, youth, and low-income residents across all modes.	**5**	EI-2, EI-3, TM-1,
Asset Management	Manage City assets to balance full life-cycle costs, performance, risk, and service levels, using BMPs and data. Public infrastructure and facility investments will leverage existing investments to support efficient and equitable growth.	**21**	PFS-2, TM-1, PR-1
Community Safe Routes	Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.	**33**	TM-1, TM-2, PFS-3, PR-2, CL-3
Community Streets	Develop guidance and encouragement for community use of the right-of-way, including plazas, parklets, "streateries," open streets events, public art, converting some low volume roadways into pedestrian only thoroughfares, and other demonstration projects.	**34**	TM-1, TM-4, PR-2
Cost-efficient Infrastructure	Design and maintain infrastructure to reduce long-term maintenance and replacement costs. Consider life-cycle costs, emerging technologies, and the impacts of facility design and material choices in both capital and operating budgets.	**39**	PFS-1, TM-1
Low-stress Bicycle and Small Mobility Network	Implement the citywide low-stress BSM Network that prioritizes safety and comfort for people of all ages and abilities.	**87**	TM-1, TM-2, TM-4
Pedestrian-oriented Design	Ensure ground floor building facades, public spaces, and streets are designed at a human scale and provide comfort, accessibility and visual interest for pedestrians.	**99**	LU-1, TM-1

Supporting Policy	Description	No.	Related Goals
Regional Infrastructure	Work with local, state, federal and tribal partners to ensure that new construction or replacement of critical infrastructure is planned and designed to avoid community harm and maximize social, environmental, and cultural value.	**121**	TM-1, PFS-1
Regional Planning	Coordinate closely with Clark County, other cities, and other government entities, such as C-TRAN, RTC, and school districts, to sustainably manage urban growth areas, efficiently deliver urban services, expand regional transit and multimodal connectivity, and coordinate on shared goals and responsibilities, in accordance with adopted countywide planning policies.	**122**	LU-4, CL-3, TM-2, TM-1
Regional Trail and Open Space Networks	Work with nonprofit and private partners, Clark County and adjacent cities to build out the regional trail network for recreation and active transportation purposes.	**123**	TM-1, PR-2, CL-2
Street Connectivity	Adopt connectivity standards to improve pedestrian and small mobility safety and accessibility. Apply standards to development, capital, and planning projects including maximum block length, unconnected streets, cul-de-sac connections, linkages between land uses, and multiple access points.	**139**	TM-1, TM-2, TM-4, LU-3
Street Standards	Adopt updated street standards that facilitate evolution to a safe, comfortable, and accessible multimodal transportation system.	**140**	TM-1, TM-2, TM-4
Support Active Transportation Investments	Improve active transportation in areas with inadequate mobility infrastructure to increase the share of trips made by foot, bike and other small mobility options, and transit, including better integrating parks and trails into the active transportation network.	**144**	TM-1, PFS-1

Goal: TM-2 Low Carbon Mobility Choices

Community members can access a suite of low carbon travel options that connect important destinations, including walking, cycling, small mobility, and transit, while reducing reliance on single occupancy vehicles.

As Vancouver continues to grow and change, the transportation network will adjust to provide more modal options for the community to move around the city and the region. With complete corridors and easy connections to transit, choosing those options will be more convenient. Walking or using a small mobility device for short trips will be safer and more comfortable for all users, and transit will be a reliable and convenient option to travel longer distances. These options will reduce per capita vehicle miles traveled and advance climate goals related to reducing transportation-related greenhouse gas emissions.

Policies related to this goal support investments in transit infrastructure, adding more housing and services near transit stations, updating street standards and maximizing the use of on-street parking. The policies also consider future mobility by preparing the City to adapt to emerging transportation technology and allowing for pilot projects that will test the feasibility and impact of new mobility options.

While the majority of people in Vancouver will continue to drive to important locations, providing options to walk, roll, bike, use a small mobility device and take transit will support the shift toward low-carbon transportation options.

Supporting Policy	Description	No.	Related Goals
Community Safe Routes	Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.	**33**	TM-1, TM-2, PFS-3, PR-2, CL-3

Supporting Policy	Description	No.	Related Goals
Emerging Mobility	Prepare for emerging technologies by updating City policies and operational requirements for shared mobility and emerging mobility vendors, including Autonomous Vehicles. Create data standards, data sharing agreements and vendor requirements.	**46**	TM-2, CE-4
Equitable Transit-oriented Development	Tailor regulations, incentives and investments to facilitate development near current and future transit stations and make this development accessible to transit-reliant and historically excluded and underserved communities.	**52**	LU-1, LU-2, TM-2
Low-stress Bicycle and Small Mobility Network	Implement the citywide low-stress bicycle and small mobility network that prioritizes safety and comfort for people of all ages and abilities.	**87**	TM-1, TM-2, TM-4
Maximize the Utilization of Existing on Street Parking	Implement strategic pricing mechanisms to regulate the availability of on-street parking in mixed use and regional activity centers.	**88**	TM-2, LU-4
Multimodal Level of Service	Update regulations and design guidance to reflect MMLOS standards that require private development and capital projects to advance multimodal safety and support shifts to non-drive-alone modes.	**93**	TM-2
Pilot Projects	Encourage the use of short-term pilot projects for park, transportation and general infrastructure improvements before making long-term investments to foster innovation, test feasibility, and increase community buy-in.	**102**	CE-4, PR-2, TM-2, CL-1
Reduce VMT and GHG per Capita	Implement land use patterns that reduce VMT, traffic congestion, and associated GHG emissions per capita, while improving safety and air quality.	**118**	CL-3, CE-3, TM-2

Supporting Policy	Description	No.	Related Goals
Regional Planning	Coordinate closely with Clark County, other cities, and other government entities, such as C-TRAN, RTC, and school districts to sustainably manage urban growth areas, efficiently deliver urban services, expand regional transit and multimodal connectivity, and coordinate on shared goals and responsibilities, in accordance with adopted countywide planning policies.	**122**	LU-4, CL-3, TM-2, TM-1
Resilient, Transit-Supportive Infrastructure	Invest in infrastructure that supports reliable, frequent, and accessible transit service as outlined in the Enhanced Transit Network, while adapting to localized climate impacts. Investments should expand mobility options, improve neighborhood access, and deliver health, economic, and social benefits.	**124**	TM-2, PFS-3, EI-2
Resources near Transit	Locate community resources near current and future transit routes to ensure access for those most reliant on public transit.	**126**	LU-1, TM-2
Street Connectivity	Adopt connectivity standards to improve pedestrian and small mobility safety and accessibility. Apply standards to development, capital, and planning projects, including maximum block length, unconnected streets, cul-de-sac connections, linkages between land uses, and multiple access points.	**139**	TM-1, TM-2, TM-4, LU-3
Street Standards	Adopt updated street standards that facilitate evolution to a safe, comfortable and accessible multimodal transportation system.	**140**	TM-1, TM-2, TM-4

Goal: TM-3 Efficient Freight Access

Vancouver's port and freight infrastructure safely and efficiently moves goods, supports economic growth, is resilient to disruptions, and minimizes negative environmental impacts.

Efficient and resilient freight infrastructure supports commercial and industrial activities in Vancouver and enables goods to move quickly, safely and reliably throughout the region. A well-maintained freight network reduces congestion, prevents delays, and lowers fuel consumption while supporting economic productivity and competitiveness. Smart infrastructure planning, such as incorporating dedicated freight routes throughout the transportation network and optimizing traffic flow with intelligent transportation systems, can significantly reduce environmental impacts.

The policies associated with this goal will enhance freight movement to and from the Port of Vancouver and other employment areas and reduce conflict between freight vehicles and other roadway users, such as personal vehicles, bikes and pedestrians.

Supporting Policy	Description	No	Related Goals
Enhance Port Access and Multimodal Freight Solutions	Improve infrastructure and connectivity to and from the Port of Vancouver to streamline freight operations.	**50**	LU-2, TM-3, EO-2
Optimize Freight Corridors	Designate and enhance freight corridors to facilitate efficient movement of goods and reduce congestion.	**98**	LU-2, TM-3, EO-2

Goal: TM-4 Eliminate Traffic Fatalities (Vision Zero)

Vancouver has a safe and comfortable travel environment for all users, regardless of age, ability or mode of travel, where traffic-related fatalities and serious injuries are eliminated.

Vision Zero represents a bold commitment to rethinking transportation systems so that safety is not negotiable. Roads, intersections, and mobility policies are designed to prioritize human life above speed or convenience, eliminating death or serious injuries in the transportation network. This extends beyond drivers to include pedestrians, cyclists, transit riders, children, older adults, and people with disabilities, recognizing that everyone deserves to move through their community without fear. By creating a safe and comfortable travel environment for all modes and abilities, Vision Zero fosters equity, encourages active transportation, and builds trust in public infrastructure.

The policies supporting the goal of Vision Zero include street standards that ensure the design of all streets in Vancouver are comfortable and inviting to multiple modes of transportation. Many of the policies focus on making streets safer and more comfortable for those who are biking, walking or rolling.

Supporting Policy	Description	No.	Related Goals
Community Streets	Develop guidance and encouragement for community use of the right-of-way, including plazas, parklets, "streateries," open streets events, public art, converting some low volume roadways into pedestrian only thoroughfares, and other demonstration projects.	**34**	TM-1, TM-4, PR-2
Low-stress Bicycle and Small Mobility Network	Implement the citywide low-stress bicycle and small mobility network that prioritizes safety and comfort for people of all ages and abilities.	**87**	TM-1, TM-2, TM-4
Street Connectivity	Adopt connectivity standards to improve pedestrian and small mobility safety and accessibility. Apply standards to development, capital, and planning projects, including maximum block length, unconnected streets, cul-de-sac connections, linkages between land uses, and multiple access points.	**139**	TM-1, TM-2, TM-4, LU-3
Street Standards	Adopt updated street standards that facilitate evolution to a safe, comfortable, and accessible multimodal transportation system.	**140**	TM-1, TM-2, TM-4

Chapter 8 - Key Implementing Actions

- ✓ Identify and make minor updates to the Transportation System Plan to align with the Comprehensive Plan, particularly in growth centers.
- ✓ Implement priority projects, programs, and policies identified in the City's Transportation System Plan.
- ✓ Continue to implement and integrate multimodal level of service (MMLOS) standards throughout transportation planning and design activities.
- ✓ Update VMC Title 11, street typologies and standards, Traffic Impact Analysis requirements, and the Traffic Impact Fee Program to include MMLOS and implement the Transportation System Plan.
- ✓ Update the City's Trail Plan and integrate it into multimodal network planning.
- ✓ Build out and develop the City's Safe Routes to Schools Program.
- ✓ Advance Vision Zero goals through design, programs, and policy.
- ✓ Partner with C-TRAN to implement their 20-Year Transit Development Plan.
- ✓ Accelerate implementation of the Complete Streets program and other programs that support a safe, convenient, and connected multimodal transportation system.

Public Facilities and Services



9

Introduction

Cities and counties must be supported by a range of local public facilities and services, including transportation, water, sanitary sewer, stormwater, parks, fire and emergency services, police, solid waste, schools, and libraries. This chapter summarizes the City of Vancouver's capital facilities and physical infrastructure needed to serve growth anticipated to occur in the city over the next 20 years. Most of these facilities are owned by the City of Vancouver, but some are owned by outside public agencies. This chapter closely connects with Chapter 8, Transportation and Mobility, and Chapter 3, Land Use and Development, to plan and manage infrastructure and urban services. It provides an inventory of existing facilities and infrastructure and a forecast of future needs based on population and employment growth and anticipated changes in the city. It includes a detailed financing plan identifying how capital facilities needed to serve the first six years of the Comprehensive Plan will be paid for, and more generalized information about costs over the



Vision: Public Facilities and Services

We will prioritize public infrastructure and facility investments that leverage our existing investments to support efficient and equitable growth. We commit to providing high-quality, well-maintained and affordable public services that protect the environment, mitigate and adapt to climate change, ensure equitable access to programs and resources, and respond to our community's needs as we grow. We commit to enhancing social infrastructure to foster a sense of connectedness, well-being and acceptance to advance equitable outcomes.

remainder of the 20-year period. This chapter summarizes more detailed information in the multi-year capital plans and budgets of individual City departments and outside agencies. Pursuant to the GMA, it focuses on needs for new or expanded capital facilities rather than operating or maintenance cost of those facilities, or personnel or non-capital facilities' needs. This chapter is a long-term planning document and intended to be amended periodically over time to remain relevant, but it will not be updated as frequently as department or agency capital budgets or project lists. Existing facilities/urban services and the service providers are listed in Table 26.

Table 26. Vancouver Public Facilities/Urban Services and Service Providers

Facility/Service	Provider(s)	Relative Planning Documents
Transportation	• City of Vancouver • Clark County (UGA) • WSDOT (I-5, I-205, State Route 14) • Port of Vancouver • BNSF Railroad	• Transportation Chapter of Comprehensive Plan • 2024 Vancouver Moves (Transportation System Plan) • Vancouver 2026-2031 Transportation Improvement Program • Clark County Comprehensive Plan • 2013 Pearson Field Master Plan (update planned for 2026-2027)
Transit	• C-TRAN	• 2025-2030 C-TRAN Transit Development Plan • Transportation Chapter of the Comprehensive Plan • RTC Regional Transportation Plan (2024)
Water	• City of Vancouver • Clark Public Utilities (UGA)	• 2015 Comprehensive Water System Plan (20-year plan); update in process, adoption anticipated 2026-2027
Sanitary Sewer (wastewater)	• City of Vancouver • Clark Regional Wastewater District • Discovery Clean Water Alliance (Treatment only)	• 2011 General Sewer Plan (20-year plan); update in process, adoption anticipated 2026-2027
Stormwater	• City of Vancouver • Clark County	• 2025 Stormwater Management Plan • Climate and Environment Chapter
Parks	• City of Vancouver • Clark County • National Parks Service (Fort Vancouver)	• Parks and Recreation Chapter • 2022-2031 PRCS Comprehensive Plan • City of Vancouver Long Range Facilities Plan (2025)

Facility/Service	Provider(s)	Relative Planning Documents
Urban Forestry	• City of Vancouver	• 2023 Urban Forestry Management Plan • Climate and Environment Chapter
Fire and Emergency Services	• City of Vancouver • Clark County Fire District 5 (City and UGA) • Clark County Fire District 6 (UGA)	• City of Vancouver Long Range Facilities Plan (2025) • Proposition 2
Police	• City of Vancouver • Clark County Sheriff (UGA)	• City of Vancouver Long Range Facilities Plan (2025) • Proposition 5
Solid Waste	• Waste Connections, Inc. • Columbia Resource Company	• 2025-2030 Comprehensive Countywide Solid Waste Management Plan
Public Schools	• Vancouver, Evergreen and Camas School Districts • Battle Ground, Ridgefield and Hockinson School Districts (UGA)	• Vancouver School District Capital Facilities Plan (2022) • Evergreen Public Schools Capital Facilities Plan (2026) • Vancouver School District Strategic Plan • EPS Strategic Plan (2023-2027) • CSD Strategic Plan (2025) • Battle Ground Public Schools Strategic Plan (2022-2027) • Ridgefield School District Strategic Plan (2025) • Hockinson School District Strategic Plan (2025-2030)
Libraries	• Fort Vancouver Regional Library System	• Fort Vancouver Regional Libraries Comprehensive Facilities Plan (2025)
General Government	• City of Vancouver • Clark County	• City of Vancouver Long Range Facilities Plan (2025) • 6-Year Project List (2025)

Community Feedback

- Concerns about whether infrastructure, facilities, and services can keep pace with growth.
- Need to maintain and upgrade existing infrastructure and public facilities.
- Desire for repairs and updates to community centers, streets, sidewalks, stormwater systems, and parks.
- Concerns that schools, fire and police services, and parks are strained.
- Concerns about rising utility costs and the potential for housing displacement associated with increased costs.
- Infrastructure and services must support climate resilience and emergency preparedness.
- Concerns about public safety and enforcement, including crime, traffic and parking enforcement, and clean and safe public spaces.

Public Facilities and Services

Wastewater

The City of Vancouver provides wastewater services within city limits and in portions of the UGA outside of city limits. The Clark Regional Wastewater District services northwest portions of the UGA. See service boundaries in Figure 28.

The City of Vancouver's wastewater collection system consists of interceptors, trunk lines, main lines, pump stations, and force mains. The wastewater treatment system is comprised of three main facilities:

- Marine Park Water Reclamation Facility
- Westside Water Reclamation Facility
- Industrial Pretreatment Lagoon

Several conveyance pump stations balance the flows between Marine Park and the westside facilities. These diversion pump stations include the Orchards Diversion Pump Station, Andresen Diversion Pump Station, and the Industrial Pump Station. There are an additional 30 collection pump stations that serve smaller areas. The collection system consists of mainly gravity lines, most of which have an 8-inch-diameter pipe size. The City's existing sewer system includes nearly 800 miles of pipelines serving approximately 47,000 customer accounts through a variety of sewer laterals and other collection means. Flows from the gravity collection system are routed to a series of interceptors, built between 1947 and 1996. More detailed information regarding the inventory of sewer system assets can be found in the General Sewer Plan.[46]

[46] City of Vancouver 2011 General Sewer Plan

Industrial and commercial wastewater may contain metals, oil and grease, organics or other pollutants at greater concentration than typical domestic wastewater. Vancouver's pretreatment program protects the wastewater collection system, treatment facilities, and environment from uncontrolled toxic pollutants. Facilities, such as restaurants, dental offices, manufacturers, fabricators, chemical blenders and others, that discharge non-domestic wastewater into the system must meet federal Clean Water requirements. The City monitors food establishments, dental facilities, and industrial dischargers on an annual basis, and issues five-year industrial wastewater discharge permits to facilities classified as significant and medium industrial users.

The model for the major wastewater collection system was refined as part of the City's General Sewer Plan (2011) to determine whether the network of pipes, manholes, pumps, and other physical facilities were adequate to convey estimated flows under storm conditions. The General Sewer Plan is currently being updated to be consistent with Ecology requirements, the adopted Comprehensive Plan, and to reflect changes to the infrastructure since 2011.

Table 27. Inventory of Sewer Facilities, Capacity, and Flows in 2025

Facility	Average Daily Flow Capacity (in MGD)	Average Daily Flow (in MGD)	Maximum Average Daily (in MGD)
Westside Water Reclamation Facility	28.3	10.7	17.1
Marine Park Water Reclamation Facility	16.1	11.0	18.1
Industrial Pretreatment	3.2	1.1	2.0

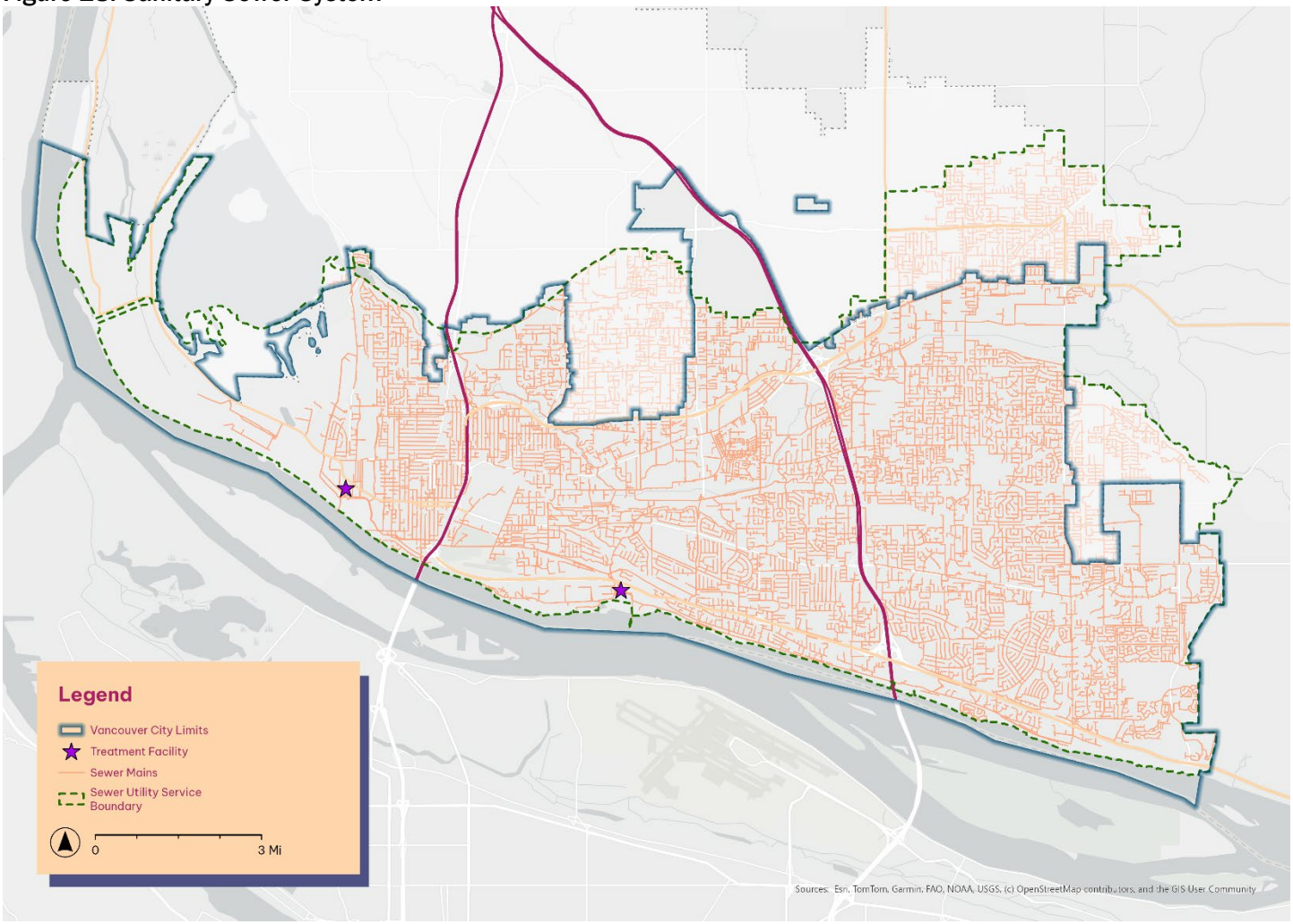
Future Demand

The existing sewer system meets all federal and state standards and has adequate capacity for existing demand. An amendment to the General Sewer Plan is underway to confirm future demand capacity and expected to be complete late 2026/early 2027. Proposed capital improvement projects will be incorporated into the CIP annually if deficiencies are identified. The system is monitored closely along with development trends to plan treatment, conveyance and collection system projects well before the system reaches capacity.

In 2025, there were approximately 5,355 on-site sewage treatment or septic systems in the Vancouver sewer service area, serving 14,456 people and discharging 0.4 million gallons per day (MGD) of effluent into the ground for treatment. Most of these systems are reaching the end of their expected life spans; therefore, failures are more likely to occur. This can result in contamination of nearby streams, lakes, or shallow drinking water wells, and may increase nitrates in groundwater. The Sewer Connection Incentive Program was developed to protect water resources from failing septic systems and to support homeowners in eliminating unreliable septic systems by connecting to the sewer system. The program completed 112 projects extending public sanitary sewers to 4,781 properties at an investment of approximately $46 million since 2000. In 2025, there were two Sewer Connection Incentive Program projects under construction, connecting approximately

50 properties to the sewer system. There were three projects in the design phase that will connect approximately an additional 175 properties to the system.

Figure 28. Sanitary Sewer System

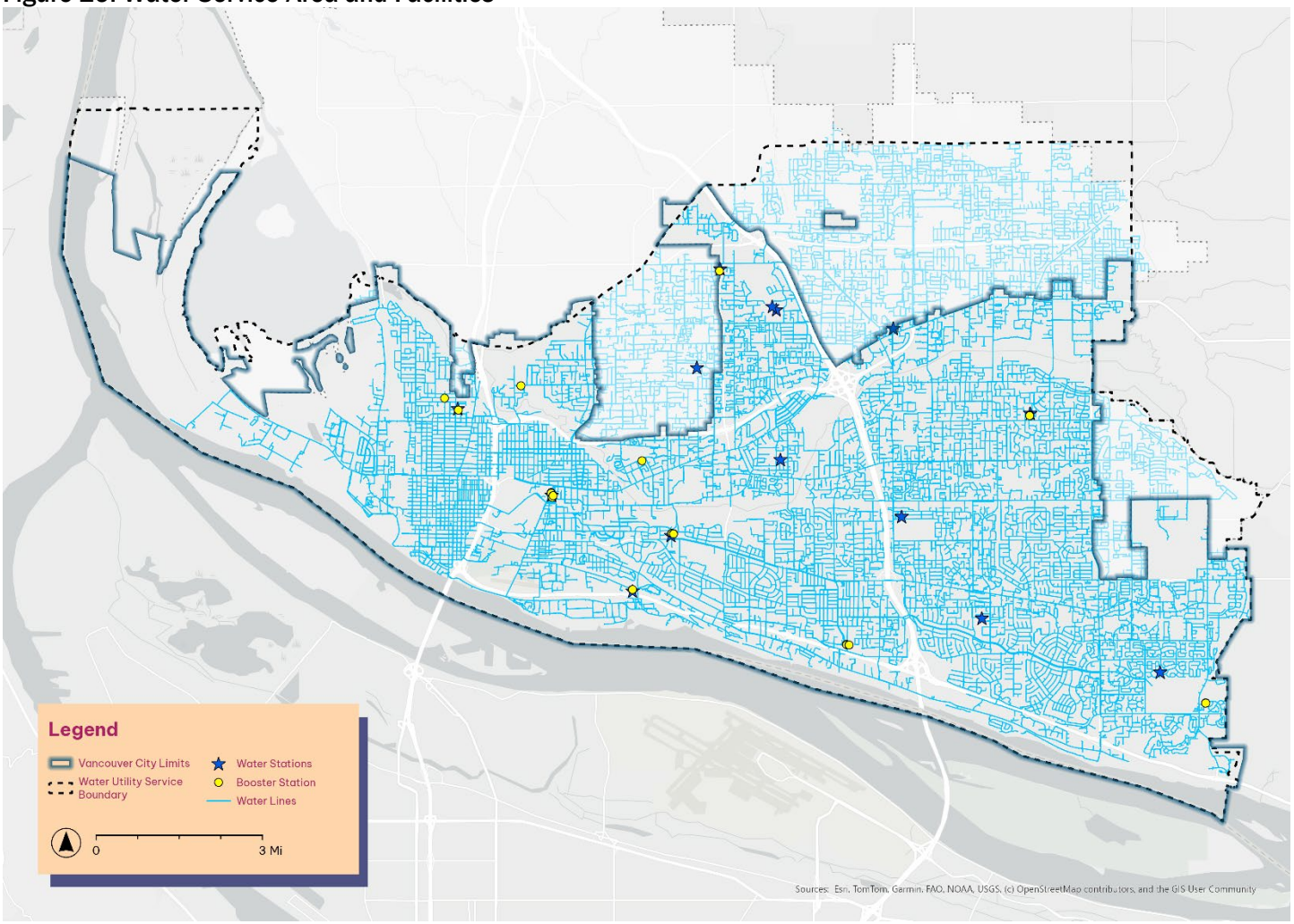


Water

Both the City of Vancouver and Clark Public Utilities provide potable water. See Figure 29 for details of the service boundaries. The City serves approximately 270,000 residents through 77,000 water service connections and, in 2024, produced approximately 9.85 billion gallons, or an average daily production of 26.9 MGD. The City operates and maintains 9 water production stations, 40 wells, 52 booster pumps, more than 1,100 miles of pipes, and 77,000 service connections that include commercial, industrial and institutional customers.[47]

[47] City of Vancouver 2022 Amendment to the 2016 Water System Plan 4-Year Extension Update

Figure 29. Water Service Area and Facilities



Water pressure requirements for the system are determined by the Washington Department of Health, which establishes minimum operating pressure standards of 30 pounds per square inch.[48] These standards ensure that adequate water flow is maintained during peak hours when there is high demand. Compliance with these pressure standards is crucial for providing a reliable water supply to the community. The National Fire Protection Association also plays a role in ensuring the effectiveness of the water system, particularly in the event of a fire. The National Fire Protection Association sets guidelines and regulations for the supply, storage, and distribution of water to meet the firefighting needs of the community. Fire flow requirements often determine the minimum size of water lines and storage capacity to ensure an adequate water supply is available for firefighting purposes.

[48] WAC 246-290-420

The complete water system analysis, hydraulic model and asset inventory for the water system is detailed in the City's Water System Plan (2015). The hydraulic model is used to determine whether the system is adequate to provide average daily, peak daily, and fire flow demands to the City's service customers. The Water System Plan is currently being updated to be consistent with the Washington Department of Health regulations, the adopted Comprehensive Plan, and to reflect changes to the infrastructure since 2015.

Equity Lens

Public facilities and services play an essential role in Vancouver's safety, growth and opportunities. The Equity Index identifies locations in Vancouver with potentially underserved populations, focusing on various metrics at the census tract level. This tool will help inform future planning and design of community services and facilities and will play a role in prioritizing investments.

Future Demand

Table 28 shows the Vancouver public water supply system and summarizes current production and future demand for the water system. Vancouver has a total annual water right for withdrawal of 16.3 billion gallons per year, or an annual withdrawal rate of 44.86 MGD. Maximum instantaneous withdrawal allowed is 108.1 MGD at 75,000 gallons per minute. Ideal design practice recommends that the source of supply be able to serve the maximum day demand, allowing stored water to be used for the daily peaking requirements of the system. Currently, the total peak reliable well capacity is 88 MGD, but other limiting factors, such as treatment capacity, restrict the total reliable capacity to 80.6 MGD. The peak day system demand was 44.6 million gallons in 2012, or 248 gallons per person. In 2025, the average day demand per person is estimated to be 102 gallons. It is estimated that the average daily demand will increase to 122 gallons per person by 2045 and that the peak day demand will increase to 300 gallons per person due to an increase in industrial and wholesale demand. The City is committed to making full use of its water rights. Based on existing and future water rights analysis, no new water rights are required in the 20-year planning period.

One challenge faced by the water system in Vancouver is the geographical disconnect between the location of the water reservoirs in the southwest area of the city and the areas experiencing population growth in the northeast part of the city. To maintain the flow of water and meet the increasing demands, the City continuously improves its transmission infrastructure and pumping systems while addressing the storage capacity issue in the northeast. Projects are identified in the capital improvement plan and reviewed and updated annually.

Table 28. Water Production and Projected Demand

Category	2012 (actual)	2025 (estimate)	2045 (projected)
Service area population (includes incorporated City and adjacent unincorporated areas)	228,779	273,500	324,335
Average Daily Demand (ADD) in millions of gallons per day (MGD)	25	28.0	39.6
ADD/person, in gallons	144	102	122
Peak day demand in MGD	44.6	54.4	76.8
Number of sources (wells)	40	40	40
Reliable source (well) capacity in MGD	49.8	49.8	58.44
Storage capacity in MG	24	28.25	39.25
Primary water rights, Instantaneous Withdrawal (Q_i) in MGD	43.41	43.41	43.41
Primary water rights, Annual Withdrawal (Q_a) in billions of gallons per year	15.8	15.8	15.8

Stormwater

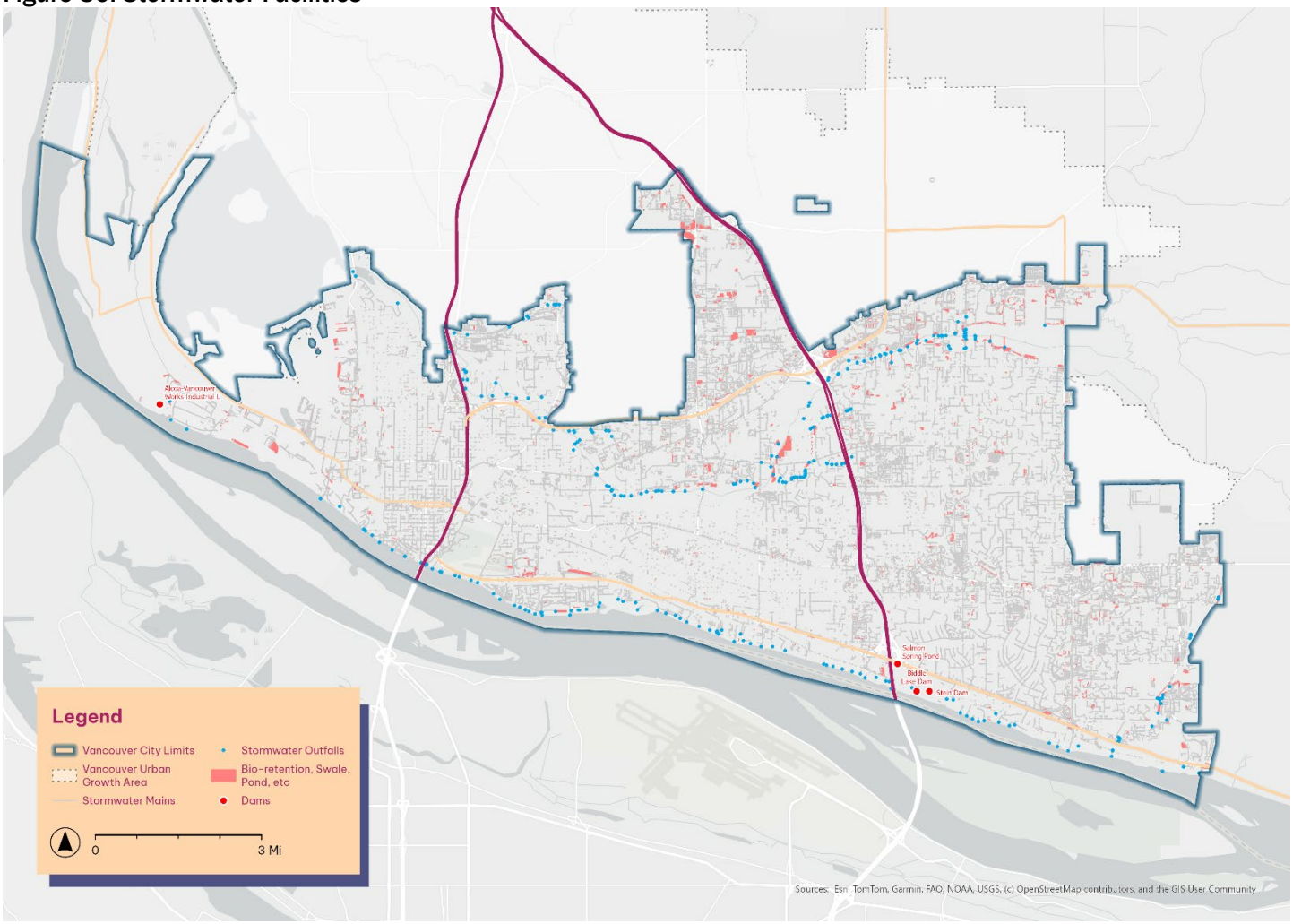
The City of Vancouver works to protect local water resources and aims to improve water quality. Stormwater is regulated under the Federal Clean Water Act through the National Pollutant Discharge Elimination System permit program administered by Ecology. The City's current stormwater permit is valid through July 31, 2029, and re-issued every five years. The City follows the Stormwater Management Manual for Western Washington as the standard for designing and managing stormwater systems.

Ecology also regulates stormwater infiltration to protect groundwater and drinking water supplies. These requirements help prevent pollutants in stormwater runoff from contaminating groundwater. Vancouver's stormwater infiltration systems, such as drywells, are regulated under this program.

When stormwater infiltrates into the ground, it can mix with shallow groundwater that feeds nearby streams, springs, and rivers, or it can recharge deeper groundwater aquifers. Burnt Bridge Creek and springs along the Columbia Slope are supplied by both surface water and groundwater, including water influenced by stormwater infiltration systems.

The City owns and maintains approximately 3,500 drywells and nearly 65 miles of infiltration trenches, many of which have been in place for more than 40 years. In addition, the City's stormwater system includes approximately 275 miles of pipes, 188 outfalls to surface waters, and 724 treatment and flow control facilities, which includes over 400 bioretention facilities. See Figure 30 for locations of stormwater facilities.

Figure 30. Stormwater Facilities



Because much of Vancouver was developed before current stormwater regulations were adopted, runoff from older areas is often not treated before discharging to the ground or surface waters. The City is actively identifying areas that would benefit from additional stormwater treatment BMPs and is incorporating these improvements into the CIP. The City maintains a Stormwater Management Program Plan, which documents current and planned actions to protect water resources. The Stormwater Management Program Plan is updated annually. Vancouver implements low impact development (LID) principles and BMPs as the preferred approach for site development under the City's land use and development codes. Development projects are required to comply with the Stormwater Management Manual for Western Washington, which emphasizes LID techniques, such as groundwater recharge, preservation of on-site natural features, thoughtful site planning, and the use of distributed stormwater BMPs integrated into a project's design. Common LID practices include bioretention facilities, rain gardens, roof runoff infiltration, permeable pavements, reduced excavation foundations, vegetated roofs, and rainwater harvesting.[49]

[49] 2025 Stormwater Management Program Plan

Future Demand

New construction or redevelopment will increase the amount of new impervious surfaces, including rooftops, driveways, roadways, sidewalks, parking lots, and compacted soils. Impervious surfaces reduce natural infiltration of water into soils and increase surface water runoff, which can change the way that water and pollutants travel to urban streams and lead to increased stormwater impacts. All development projects are required to provide erosion control, stormwater capture and treatment, and conveyance on site in accordance with VMC 14.24, 14.25 and 14.26.

Development projects that create or replace impervious surfaces within City right-of-way are required to construct new stormwater facilities to City standards, and are dedicated to the City for operation and maintenance. If on-site stormwater management is not feasible for a specific site, projects may propose to connect to City-owned stormwater facilities and must provide a full downstream capacity analysis prior to approval.

Green Infrastructure

In 2023, House Bill 1181 took effect in Washington and includes a new term, "green infrastructure," to be included with the inventory of existing capital facilities. Green infrastructure includes parks and tree canopy and stormwater infrastructure and management practices. Vancouver's stormwater infrastructure and policies are detailed in the section above, as well as in Vancouver's Stormwater Management Program Plan. More information about Vancouver's parks can be found in Chapter 7, Parks, Recreation & Cultural Services, of this plan and the Parks, Recreation and Cultural Services Comprehensive Plan. Vancouver's Urban Forestry Division works to preserve, manage and enhance Vancouver's existing tree canopy and promotes reforestation of the urban area. Tree canopy management practices and policies can be found in the Urban Forestry Management Plan.

Fire and Emergency Services

The Vancouver Fire Department (VFD) provides fire protection and emergency medical services to the City and Clark County (via Fire District 5). In addition to fire and emergency medical services, they provide maritime response, fire prevention and fire investigation. Regionally, they provide hazardous materials and technical rescue responses. VFD, in partnership with Fire District 5, serves 301,500 residents in the city and in portions of the UGA, across 90 square miles, including 22 miles of shoreline along the Columbia River, running more than



38,500 calls per year. In 2024, 62.9 percent of all service requests were emergency medical calls. The City also partners with American Medical Response (AMR) for ambulance transport.[50]

The consolidated fire department currently has 14 facilities, including 11 fire stations, operated by 256 VFD and 190 AMR personnel. Vehicular equipment includes one each of heavy rescue unit, medical rehab unit, mobile air compressor, fire boat, high-capacity pump and foam tender and fire investigation unit; two each of brush units and battalion chief units; three each of mobile water tenders, ladder trucks, and paramedic squads; and 11 fire engines.

VFD uses a metric of firefighters per 1,000 people as one way of projecting future needs to maintain or improve LOSs to the community. The current ratio is 0.83 firefighters per 1,000 people.[51] Priorities 1 and 2 include fire and critical medical calls, Priorities 3 and 4 are less critical, and Priority 5 are the least emergent.

Table 29. VFD Calls Per Station*

Station #	1	2	3	4	5	6	7	8	9	10	11
Calls/ station 2010	2,644	2,474	3,521	1,942	3,339	2,133	854	2,598	1,946	1,350	N/A[52]
Calls/ station 2024	5,263	3,796	3,612	2,025	5,562	4,533	1,414	4,830	3,452	2,034	1,901
% change	49.8	34.8	2.5	4.1	40	52.9	39.6	46.2	43.6	33.6	N/A

***Calls are for fire and emergency medical aid service.**

Table 30. 2024 VFD Response Time Performance

Alarm Type	Standard Response Time	2024	2024 % Met Standard	No. of Calls Received in 2024	Percent Change Over 2023
Priorities 1 and 2 (except maritime)	07:59	08:01	89.9%	16,676	5.5%
Priorities 3 and 4 (except maritime)	10:59	08:43	95.8%	8,582	-0.7%
Priority 5 Non-Medical	15:59	10:35	98.3%	5,873	16.3%
Priority 5 Emergency Medical-Ambulance Only	17:59	17:50	90.4%	7,436	-5.4%

[50] VFD-Annual-Report_2024-final.pdf
[51] 949b2eaca3e28d8fdc13a296056e0dcf_OurVancouver_DraftEIS_July2025.pdf
[52] Construction of Fire Station 11 was completed in 2022.

Future Demand

Population density, number of emergency calls per station area, response times, and national standards developed by the Insurance Services Offices, Inc. and the U.S. Fire Administration are used to decide when to staff fire stations with career personnel, and when and where to build new fire stations. The need for additional response units is based on the same factors and on the number of emergency calls per response unit.

VFD is planning to relocate and construct new facilities for Station 3 in the Heights in central Vancouver and Station 6 in Burton Ridge in east Vancouver over the next five years to address growing needs in these areas. The City is also considering construction of new fire stations downtown and/or in the St. Johns area to accommodate future city growth and ensure adequate emergency response times and serviceability. Station 5 is an aging facility at capacity that either requires a seismic upgrade or rebuild after 2030. Station 4 will be seismically retrofitted as part of the Proposition 2 capital project work. Fire and police identified a need for training facilities, which could be combined and/or include other partners. Construction of a training facility is dependent on finding an appropriate property and securing partnerships and funding.

Police



The Vancouver Police Department (VPD) provides police services in the city and is authorized to employ 241 officers, with 226 sworn members as of February 2025. VPD is located in eight facilities throughout the city. Similar to VFD, VPD uses a metric of sworn officers per 1,000 people to help project future needs to maintain or enhance its services to the community. VPD currently has a ratio of 1.2 sworn officers per 1,000 people but has identified a need to increase that number to 1.4 sworn officers per 1,000 people based on current population and anticipated growth. A ballot initiative, Proposition 5, that was approved by voters in fall 2025, will help to fund hiring of new officers to meet that goal. VPD serves approximately 50 square miles, divided into two precincts, east and west, which are further divided into two districts per precinct. Each district is then divided into beats, and individual patrol officers are responsible for handling calls for service within each beat.[53]

Table 31 summarizes the number of events initiated by community members and by officers in 2024, as well as the average response time for community-initiated events. The event priority number

[53] 949b2eaca3e28d8fdc13a296056e0dcf_OurVancouver_DraftEIS_July2025.pdf

refers to the level of emergency, with Priorities 1, 2, and 3 indicating calls that require an immediate response and Priorities 4, 5, and 9 referring to calls with less immediacy.

Table 31. Vancouver Police Department Response Times

Event Priority	2024 Community-Initiated Events (% Change from 2023)	Avg Response Time Community-Initiated Events	2024 Officer-Initiated Events (% Change from 2023)	Total Events (% Change from 2023)
1	460 (-16.2%)	5.56 minutes	11 (-50.0%)	471 (-17.5%)
2	5,968 (-4.7%)	8.34 minutes	192 (6.1%)	6,160 (-4.4%)
3	43,034 (-7.1%)	10.74 minutes	19,922 (64.4%)	62,956 (7.7%)
4	21,972 (-10.3%)	13.82 minutes	12,413 (-6.2%)	34,385 (-8.9%)
5	2,307 (-21.7%)	13.18 minutes	1,564 (-10.0%)	3,871 (-17.4%)
9	5,349 (-15.4%)	7.46 minutes	19 (11.8%)	5,368 (-15.3%)
Total	**79,090 (-9.0)**	**10.82 minutes**	**34,121 (25.0%)**	**113,211 (-0.9%)**

Future Demand

Projected incremental residential and employment growth will increase demand for VPD services. The City has identified a replacement of VPD Headquarters on its list of capital improvements through 2029. VPD reports that its east and west precinct buildings are currently at capacity for current staff levels and have limited potential for expansion due to land constraints. VPD will need to reevaluate staffing levels and equipment within both the east and west precincts to accommodate future demand. The evidence storage facility lacks adequate parking, covered storage, and evidence processing space. Plans to expand this facility begin in 2030. Fire and police identified a need for training facilities, which could be combined and/or include other partners. Construction of a training facility is dependent on finding an appropriate property and securing partnerships and funding.

Schools

The Vancouver school system is a mix of public, charter, private, and special schools. Two regional public school districts have facilities in Vancouver: the Vancouver Public Schools (VPS) and the Evergreen Public Schools (EPS). The city also is home to the Washington School for the Deaf, the Washington School for the Blind, and Clark College, a community college offering bachelor's and associate degrees and certificates. Cascadia Tech Academy, which offers cooperative career and technical learning experiences in partnership with 10 school districts, including VPS and EPS, is also located in central Vancouver.

Vancouver's school districts are facing the challenge of providing quality educational facilities given the rapid growth and development in the city and county. For the fastest growing school districts, the dilemma of serving students in portables (or having "unhoused students") is exacerbated by the continued growth projections for the region. Capital facilities demands are increased by aging infrastructure, the need for better instructional technology and facilities to support high-quality teaching and learning (such as computers, presentation equipment and science labs), the desire for equity among facilities and the move toward smaller class sizes and special programs. Close coordination between the City, County and school districts is essential to adequately address these challenges.[54]



VPS is the primary provider of public education in west and central Vancouver. The school district consists of 21 elementary, 6 middle, and 7 high schools covering a district of 58 square miles, as well as 5 specialty schools. The average student-teacher ratio is 17:1, which is less than the state average of 19.7:1.

In 2022, VPS adopted a six-year Capital Facilities Plan (CFP) that established average classroom sizes for elementary, middle, and high school grade levels. The CFP guidelines suggest that average class sizes should be as follows:

- Elementary school, Grades K-5: 21.5 students per classroom
- Middle school, Grades 6-8: 26 students per classroom
- High school, Grades 9-12: 27 students per classroom
- Special education students: 10 students per classroom

VPS uses standard assumptions about new student generation rates to forecast their capacity needs. A map of existing Vancouver Public Schools is available in the VPS Capital Facilities Plan (2022) and included in Appendix A, VPS 6-year Capital Facilities Plan.

The EPS Capital Facilities Plan for 2026-2032 establishes educational programs and standards of service, an inventory of capital facilities, enrollment projections, facility needs, finance plans, and

[54] Draft Clark County Comprehensive Plan School Element

review of school impact fees. EPS serves Clark County and the eastern part of Vancouver and consists of 22 elementary, 6 middle, and 6 high schools serving about 23,366 students (2024 enrollment). It also includes 4 specialty schools. A map of EPS building locations is available in Appendix A, EPS Building Locations. The District's educational standards of service include:

- Grades K-3 – targeted at 23 students per class
- Grades 4-5 – targeted at 25 students per class
- Special Education – 1 to 15 students per classroom for elementary schools
- Grades 6-8 – targeted at 27.33 students per class
- Grades 9-12 – targeted at 30 students per class
- Special Programs (e.g., music, art, and physical education) –20 to 70 students per class

Future Demand

The VPS CFP projected insufficient capacity by 2028 at two schools, Ogden Elementary in central Vancouver and Sacajawea Elementary in west Vancouver and called for adding classrooms and co-op space at both schools. All other VPSs had reported enrollment levels below their building capacity.

The updated Evergreen CFP projects a decrease in enrollment that will level off and remain steady through 2032. One factor hindering enrollment growth has been the slow growth in the child population cohort within Evergreen boundaries. The annual kindergarten-to-birth (K-to-birth) ratio is a key metric representing a combination of net migration between birth and age five and the share of five-year-old residents enrolled in district kindergarten classes, often referred to as a "capture rate."

EPS also uses standard assumptions about new student generation rates to forecast their capacity needs. The ratios for Evergreen have fluctuated, recovering from the 2020-2021 low of 0.75, but have not returned to pre-pandemic levels. The middle scenario assumes that K-to-birth ratios will increase slightly in the next years before stabilizing at 0.89 from 2028 through 2032.

Looking forward to 2045, population growth will increase the number of new students in both VPS and EPS. This growth would occur incrementally over the next 20 years.

Table 32 summarizes the current and projected number of future new students for each school district in 2045 based on estimated capacity for housing units and associated new school-age population. There will be more projected new students in areas served by EPS than VPS because more growth is forecast to occur within the EPS service area (primarily east Vancouver). Both school districts will need to account for this projected growth as part of their CFP planning processes and identify potential capacity issues.

Table 32. Current Enrollment and Future Projected New Students

	Vancouver Public Schools	Evergreen Public Schools
Current Enrollment (2024)	-	-
Elementary School (K-5)	9,468	9,046
Middle School (6-8)	4,651	4,844

	Vancouver Public Schools	Evergreen Public Schools
High School (9-12)	7,302	8,240
Current Enrollment Subtotal	**21,421**	**22,130**
Future Enrollment (2045)	-	-
Elementary School (K-5)	1,732	1,986
Middle School (6-8)	764	896
High School (9-12)	953	1,158
Future Enrollment Subtotal	**3,449**	**4,040**
Total Enrollment 2045	**24,840**	**26,170**

Library Services

Fort Vancouver Regional Library District (FVRLibraries) serves more than 550,000 residents of Clark, Klickitat, Skamania, and Cowlitz counties. There are 15 library locations, 2 bookmobiles, 24/7 digital branch, and diverse outreach programs. It also maintains an Operations Center that houses Library administrative and support services. There are over 596,000 physical items and over 197,000 digital materials. Vancouver has four library branches within city limits or the UGA, including Cascade Park Community Library, Vancouver Community Library, Vancouver Mall Community Library, and the Three Creeks Community Library, as well as the District's Operations Center.[55]

In 2025, FVRLibraries updated its comprehensive facilities plan, which includes a 20-year facilities vision and a 10-year capital plan. A new 5-year strategic plan (2026-2030) for FVRLibraries will be completed in early 2026. The 2025 FVRLibraries Comprehensive Facilities Plan establishes a level of service for public library space of 0.5 to 0.6 square feet per capita. As of 2025, within Vancouver, there is 123,660 square feet of public library space (not including the Operations Center). The current space per capita for Vancouver is 0.64 square feet.

Future Demand

To keep public library facilities well maintained and build capacity for future community growth, the Comprehensive Facilities Plan recommends the following capital projects:

- Renovate Three Creeks Community Library
- Renovate Cascade Park Community Library
- Address ongoing capital maintenance needs at Vancouver Community Library
- Acquire a suitable site and build a new library branch within the area bounded by I-5, I-205, and State Route 500.

[55] FVRL Comprehensive Facilities Plan 2025

Administrative and Public Works Buildings



In addition to fire and police stations, community centers and specific utility sites, the City owns and operates buildings in which various government and educational services are provided. City Hall at 415 West Sixth Street provides office and meeting space for numerous City departments. It contains Council Chambers, where City Council and other commissions and boards meet. The Permit Center is located in City Hall and is open to the public three days per week. In 2022, the City purchased 521 Chkalov and is renovating the building to relocate some public facing and customer service functions.

The Zhen Building, at 5107 East Fourth Plain Boulevard, hosts Community Court and a division of Public Works. The building is in poor condition and once vacated, will be demolished. Community Court will need to relocate when that happens.

The Operations Center, at 4711 East Fourth Plain Boulevard, provides office and meeting space primarily for the Public Works Department. A new 32-acre Public Works Operations Campus on NE 94th Avenue between NE 88th Street and NE 91st Street is planned to open by the end of 2028. The current Operations Center does not meet the current or long-term needs of the community. The facility has original electric and plumbing systems from 1951, lacks ADA-compliant access and does not currently meet seismic standards.



The new campus will allow the City's Public Works Department to provide more efficient and effective operations, increase sustainable practices, enhance responsiveness, provide continued operations in the event of a seismic event, and serve as an Emergency Operations Center in the event of a major emergency or natural disaster. The new Operations Campus will replace/relocate the existing operations center's staff and facility and consolidate additional

operations sites currently scattered around the city to a single location. Consolidation will decrease costs and increase overall efficiency of services to the public.

The Brookside Complex (2323 General Anderson Avenue) includes the public-facing Utilities Billings office and an operations yard, fleet parking and crew building. The Eastside Operations Center (912 NE 192nd Avenue) includes portable crew building, enclosed parking shed, bulk material storage, and laydown space. The Marine Park Engineering building at 4500 SE Columbia Way provides office and meeting space for the Utilities Engineering, Environmental Services and Business Services divisions of the Public Works Department.

The Water Resource Education Center, at 4600 SE Columbia Way, is a facility meant to educate the public about planning and managing water resources and sewer infrastructure, as well as advancing stewardship of the community's high-quality water resources. Programming, such as exhibits, tours and volunteer programs, are available to the public, as well as access to the community room, hosting up to 160 people. The VPRCS Department owns and operates the Firstenburg Community Center in east Vancouver and Luepke Senior Center and Marshall Community Center (both in west Vancouver). The Arts Hub is an emerging community space in the design stage as of 2025 and located in the former FVRLibraries Operations Center. The Vancouver Tennis Center (in central Vancouver) is owned by Vancouver School District but site improvements and management are funded by the City. Additional details about these community centers can be found in Chapter 7, Parks, Recreation & Cultural Services, of this plan, as well as the Parks, Recreation & Cultural Services Comprehensive Plan.

Community Experience Lens

Public facilities and infrastructure investments play an important role in shaping how residents understand, experience, and connect with the built environment. In addition to delivering essential services, there is an opportunity to more intentionally design and program public facilities and spaces to celebrate and communicate these investments. Events and community programming tied to the completion of major capital projects—such as parks, transportation improvements, or civic facilities—can help residents better understand the purpose and value of these investments, while fostering a stronger sense of transparency, trust, and shared ownership. Integrating arts and cultural programming into public facilities and infrastructure projects can further enhance their visibility and community relevance, using creative expression as a tool for education and storytelling. Prioritizing the inclusion of arts and cultural spaces within community facilities—such as performance areas, studios, and flexible multi-use spaces—also ensures that public investments support not only service delivery, but community identity, cultural expression, and everyday civic life.

Figure 31. General Government Facilities

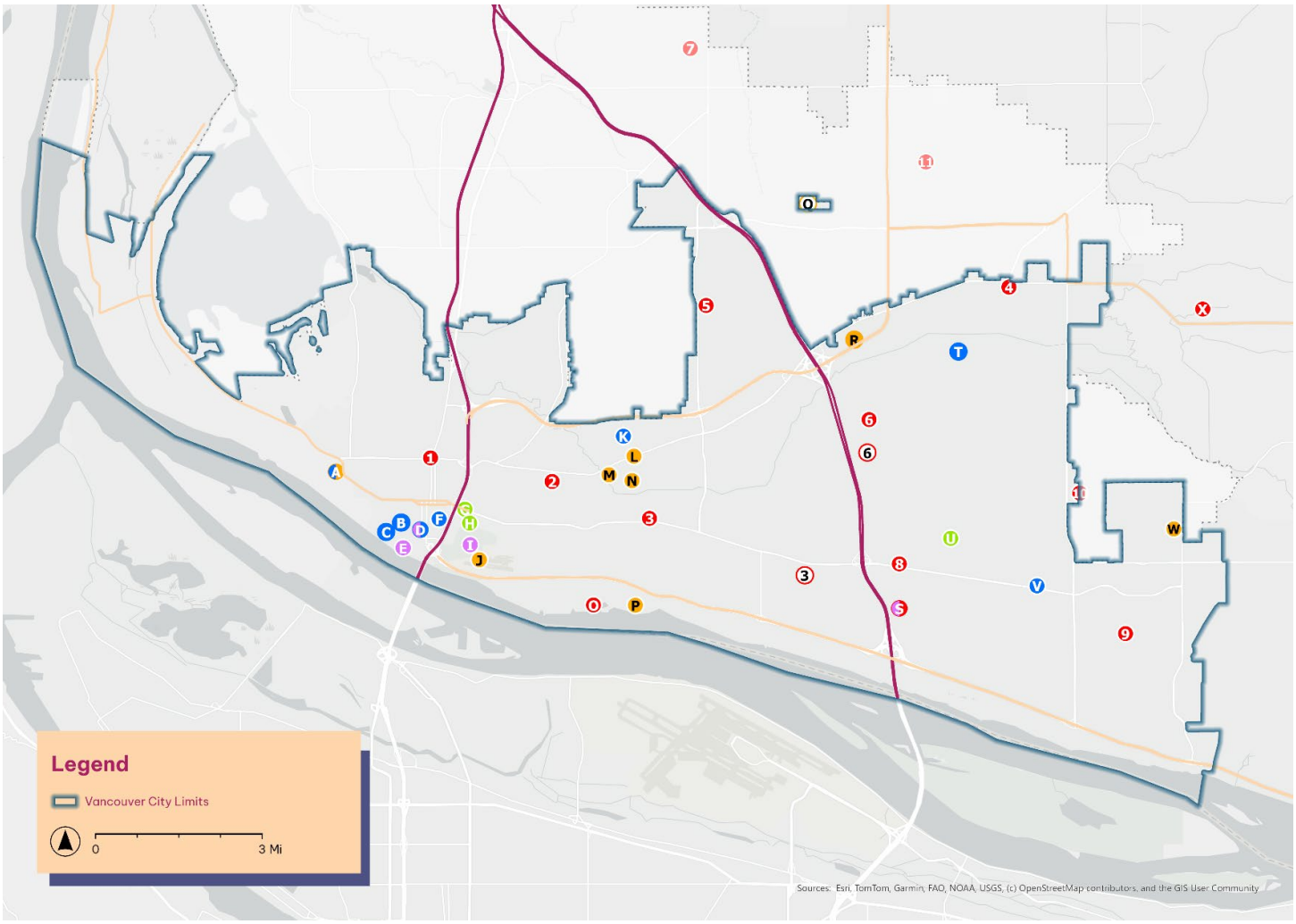


Figure 32. General Government Facilities Key

POLICE	
A	Evidence Facility
B	Clark County Children's Justice Center[1]
C	Elder Justice Center[1]
D	DVPC[1]
F	Headquarters
K	West Precinct
T	Image Elementary[1]
V	East Precinct

ADMINISTRATION	
E	City Hall
S	521 Chkalov
I	Historic Trust/Officers Row[2]
J	Zhen Building
D	DVPC[1]

1 Leased facility
2 Managed by outside contractor

PARKS, RECREATION, AND CULTURAL SERVICES	
G	Marshall Community Center and Luepke Senior Center
H	Arts Hub
U	Firstenburg Community Center

PUBLIC WORKS	
A	Westside Wastewater Treatment Plant[2]
J	Pearson Airport[2]
L	Zhen Building
M	Fourth Plain Operations Center
N	Brookside Complex
P	Marine Park Water Engineering, Marine Park Wastewater Treatment Plant[2], and Water Resource Education Center
Q	Operations Center (planned)
R	WSDOT Building[1]
W	Eastside Operations Center

FIRE	
1	Station 1
2	Station 2
3	Station 3
3	Station 3 (planned)
4	Station 4
5	Station 5
6	Station 6
6	Station 6 (planned)
7	Station 7
8	Station 8
9	Station 9
10	Station 10
11	Station 11
O	Boathouse
S	521 Chkalov
X	Fire Cache

Solid Waste

The City's Public Works Department oversees a Solid Waste utility providing garbage, recycling and organics collection through a contractor, Waste Connections. The City offers a variety of waste and recycling resources to residents, including information on hazardous waste removal, recyclables, and composting. The City also offers organics pickup for residents and businesses to help reduce the amount of organic materials going to landfills. This practice is in alignment with the State of Washington's Organics Management Law, which is intended to divert 75 percent of previously disposed organic materials from the landfill by 2030, and rescue 20 percent of previously disposed edible food for human consumption by 2025.



The City has historically been included in the development of and adopted Clark County's Comprehensive Solid Waste Management Plan, which has been updated for the years 2025-2030 and is pending adoption by Ecology. The plan describes existing conditions and outlines strategies for waste reduction, recycling, organics, moderate risk waste, miscellaneous waste, solid waste collection, transfer and disposal. The plan also discusses funding and financing of capital needs and an implementation schedule with recommendations for each of these areas of the county, including the City of Vancouver.

Columbia Resource Company, a subsidiary of Waste Connections, operates three transfer stations in Clark County (in central Vancouver, west Vancouver, and Washougal) and is the designated processor of recyclables. These transfer stations charge fees to accept miscellaneous solid waste, organics, and recyclables. Master plans for each facility identify the investments needed to build them out to meet future growth.

Future Demand

Increases in population density and new residential and commercial development will increase demand for garbage, recycling, and organics collection. Additionally, new mandates adopted by the Washington State Legislature relating to organics management and the reduction of solid waste will put a significant additional burden on the utility in the coming years. The recently passed organics management laws aim to divert organic materials away from landfills through prevention, food rescue, and organics management facilities to achieve its 2030 goal to reduce organic material in the landfill by 75 percent.

Private Utilities

Efforts to transition to non-emitting[56] and renewable[57] energy sources are underway in the city and region, with roughly 52.7 percent[58] of energy used in Vancouver and greater Clark County coming from non-emitting and renewable energy sources. Clark Public Utilities manages and operates electrical distribution, generation, and water systems. Clark Public Utilities serves electricity to all of Clark County, Washington. The Clean Energy Transformation Act commits the state to transition to 100 percent clean electricity by 2045, and Clark Public Utilities will help lead this effort locally. Currently, Clark Public Utilities energy sources include hydropower (42.46 percent), natural gas (28.75 percent), nuclear electricity (7.03 percent), wind power (3.21 percent), and unspecified sources (18.55 percent). Unspecified sources are market purchases that are not tracked back to physical resources. Because hydropower is widely available in the region, a significant but unknown portion of this source is from hydropower. The remaining balance was sourced from natural gas powered plants.

In 2024, Clark Public Utilities provided electric service to 239,896 customers with 5,610,947 megawatt hours and a peak demand of 1,144 megawatts. Its generating system produced 1,418,300 megawatt hours of electricity. In their 2024 Integrated Resource Plan, Clark Public Utilities forecast that sufficient energy resources are available to meet customer demand through 2035; however, there is already a capacity[59] deficit, which is expected to grow through 2044. The finding of an immediate need for additional capacity prompted Clark Public Utilities to switch to the Bonneville Power Administration's load following product in October 2025. Clark Public Utilities determined that it will need to procure new energy resources to continue meeting customer demand for the next 20 years.

NW Natural is the natural gas provider for the city and provides heating and other energy needs to approximately 2.5 million people across Oregon and Southwest Washington. The company serves more than 140 communities through 800,000 meters. In Washington, the typical residential customer uses an average of 57 therms per month. NW Natural is aiming to reach carbon neutrality by 2050 by providing renewable natural gas, introducing clean hydrogen energy, and carbon capture, use and storage.

Telecommunications and internet services are provided by numerous private companies, including, but not limited to, AT&T, Verizon, Xfinity (Comcast), T-Mobile, Century Link, and Ooma.

Future Demand

New residential, commercial, and industrial development will result in additional utility demand and energy use. Energy providers will need to coordinate with the City to ensure their respective future infrastructure planning is consistent with the city's projected growth through 2045. Specific

[56] Nuclear resources are classified in the Clean Energy Transformation Act as "non-emitting"
[57] Includes hydropower and wind energy sources
[58] Clark Public Utilities 2024 Fuel Mix Disclosure
[59] Maximum electricity output that can produced under specified conditions

proposed projects will need to demonstrate that there are adequate energy resources to support their development. Clark Public Utilities has identified a potential future energy deficit and is identifying sources to meet additional energy needs. Past and current versions of Clark Public Utilities' long-term plans, including the Integrated Resource Plan, Clean Energy Implementation Plan, and plans for Conservation, Demand Response and Transportation Electrification, are available on the utility's public website.

Parks and Open Space

For information and details on Vancouver's Parks and Recreation amenities, see Chapter 7, Parks, Recreation & Cultural Services.

Transportation System

For information and details on Vancouver's transportation system, see Chapter 8, Transportation and Mobility.

Level of Service

LOS is a quantifiable measure for an amount or quality of a public facility or service. LOS helps measure the capacity of a facility or service to provide for the community. As the community changes, the LOS may indicate where to prioritize future funding and resources. Some public facilities and services also have concurrency standards. Concurrency means that the LOS of the facility is maintained to serve new development at the same time, or within six years of occupancy, which may require mitigation if the standard is not maintained. The Comprehensive Plan requires concurrency for water, sewer, and transportation services and identifies them as Tier I public facilities and services. LOS is not required for Tier II facilities, as listed below in Table 33.

Table 33. Service Tier and Level of Service

Service Tier	Public Facility	Level of Service
Tier I	Wastewater	Meet all federal and state standards with adequate capacity for existing and future demand.
Tier I	Water	Meet peak hourly demands with pressure ≥30 psi at all points in the distribution system. For fireflow conditions, ≥40 psi.
Tier I	Transportation	See Chapter 8, Transportation and Mobility
Tier II	Stormwater	Meet and maintain requirements in the National Pollutant Discharge Elimination System Phase II Stormwater Permit
Tier II	Fire and Emergency Services	0.83 firefighters per 1,000 residents AMR Response Time: Priorities 1 and 2 (high, low density): 9:59, 19:59 Priorities 3 and 4 (high, low density): 12:59, 19:59 Priorities 5 and 6 (high, low density): 17:59, 29:59
Tier II	Police	1.4 sworn officers per 1,000 people
Tier II	Schools – VPS	Average class sizes

Service Tier	Public Facility	Level of Service
		Elementary: 21.5 Middle: 26 High: 27 Special Education: 10
Tier II	Schools – EPS	Targeted students/class K-3: 23 Grades 4-5: 25 Special Education (elementary): 1 to 15 Middle: 27.33 High: 30 Special Programs (e.g., music, art, PE): 20 to 70
Tier II	Parks	6 acres acquired neighborhood/community parks/1,000 residents 4.25-acre developed neighborhood/community parks/1,000 residents
Tier II	Library Facilities	0.5-0.6 square feet of library branch space/resident

Capital Facilities Forecast

The GMA requires cities to plan for adequate capital facilities to meet anticipated demand based on anticipated growth and the adopted land use map. Table 34 identifies the 20-year capital facility plan required to meet anticipated demand and

Table 35 provides a six-year finance plan that identifies costs of planned projects and funding over the next six years to maintain or improve LOS to Vancouver residents with anticipated growth. Additional information is available in Appendix Q. Capital Facilities Plan. These two tables identify known capital projects for the short- and long-term planning periods that will provide capacity to serve anticipated growth over the next 20 years, consistent with the adopted land use map. These projects, once completed, must be operated and maintained to ensure consistency in the services provided. Costs associated with operations and maintenance are not included in the tables below but will be assessed regularly through the City budget process and the CIP. Note that amounts are rounded to the nearest $1,000. For further details, see the respective plans and programs as linked below.

Table 34. 20-Year Capital Facilities Plan Project Cost Summary

Capital Facility	Project Type	2026-2031	2032-2045
Water	Design and Construction	$435,271,000	$289,402,000
Wastewater	Design and Construction	$260,575,000	$366,000,000

Capital Facility	Project Type	2026-2031	2032-2045
Surface Water	Design and Construction	$24,891,000	$16,300,000
Transportation	Design and Construction	$203,828,000	$390,900,000
Transit	Design and Construction	$668,835,000	$515,489,000 Note: Additional details available in 2024 RTP
Parks	Acquisition, Development, and Improvements	$127,574,000	$935,970,000
Fire & EMS	Design and Construction	$120,515,000	$41,400,000
Police	Design and Construction	$64,400,000	$161,600,000
General Government Long Range Facility Plan	Design and Construction	$271,234,000	To be determined (TBD)
Solid Waste	Design and Construction	$12,700,000	$2,500,000
Schools – VPS	Design and Construction	$7,425,000	TBD
Schools – EPS		None anticipated	EPS does not plan this far into the future
Fort Vancouver Regional Library	Design and Construction	$25,700,000	None proposed in Vancouver
Total 20-year CFP		**$2,222,948,000**	**$2,719,561,000**

Table 35. Summary of Planned Six-Year Capital Facilities Costs 2026-2031

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Transportation TIP	Funded Projects, 2026-2031	$78,578,000	Current non-grant revenue sources, dedicated street funding non-grant sources, and grant sources

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Transportation TIP	Partially-Funded Projects, 2026-2031	$53,150,000	Current non-grant revenue sources, dedicated street funding non-grant sources, and grant sources
Transportation TIP	Unfunded Projects	$72,100,000	Current non-grant revenue sources, dedicated street funding non-grant sources, and grant sources
Transit Transit Development Plan	Infrastructure, system expansion, capital obligations, other	$668,835,000	Sales tax, federal and state grants, farebox, interest
Water 6-Year Water Capital improvement Program 2026-2031	Production Projects	$19,028,000	Ratepayer revenue, System Development Charges, grants/loans, PFAS legal settlement funds, and miscellaneous revenue
Water 6-Year Water Capital improvement Program 2026-2031	PFAS Mitigation	$238,300,000	Ratepayer revenue, System Development Charges, grants/loans, PFAS legal settlement funds, and miscellaneous revenue
Water 6-Year Water Capital improvement Program 2026-2031	SCADA Projects	$1,012,000	Ratepayer revenue, System Development Charges, grants/loans, PFAS legal settlement funds, and miscellaneous revenue
Water 6-Year Water Capital improvement Program 2026-2031	Distribution Projects	$12,009,000	Ratepayer revenue, System Development Charges, grants/loans, PFAS legal settlement funds, and miscellaneous revenue

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Water 6-Year Water Capital improvement Program 2026-2031	Transmission Projects	$37,852,000	Ratepayer revenue, System Development Charges, grants/loans, PFAS legal settlement funds, and miscellaneous revenue
Water 6-Year Water Capital improvement Program 2026-2031	Planning/Other	$127,070,000	Ratepayer revenue, System Development Charges, grants/loans, PFAS legal settlement funds, and miscellaneous revenue
Sanitary Sewer 6-Year Wastewater Capital Improvement Program 2026-2031	Collection	$106,935,000	Ratepayer revenue, System Development Charges, loans, and miscellaneous revenue
Sanitary Sewer 6-Year Wastewater Capital Improvement Program 2026-2031	Treatment: Marine Park	$21,090,000	Ratepayer revenue, System Development Charges, loans, and miscellaneous revenue
Sanitary Sewer 6-Year Wastewater Capital Improvement Program 2026-2031	Treatment: Westside	$119,100,000	Ratepayer revenue, System Development Charges, loans, and miscellaneous revenue
Sanitary Sewer 6-Year Wastewater Capital Improvement Program 2026-2031	Treatment: Lagoon	$6,200,000	Ratepayer revenue, System Development Charges, loans, and miscellaneous revenue
Sanitary Sewer 6-Year Wastewater Capital Improvement Program 2026-2031	Treatment: Other	$7,250,000	Ratepayer revenue, System Development Charges, loans, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Regulatory Compliance and UIC Retrofit	$7,265,000	Ratepayer revenue, grants, and miscellaneous revenue

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Facility Retrofits	$1,150,000	Ratepayer revenue, grants, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Property Acquisition	$635,000	Ratepayer revenue, grants, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Coordination Projects	$550,000	Ratepayer revenue, grants, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Sub-Standard Systems	$10,000,000	Ratepayer revenue, grants, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	WSDOT Fee Projects	$523,000	Ratepayer revenue, grants, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Planning	$1,890,000	Ratepayer revenue, grants, and miscellaneous revenue

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Stormwater Demand Response	$1,050,000	Ratepayer revenue, grants, and miscellaneous revenue
Stormwater (Surface Water) 6-Year Surface Water Capital Improvement Program 2026-2031	Burnt Bridge Creek WQ Study TMDL/SMAP Projects	$1,828,000	Ratepayer revenue, grants, and miscellaneous revenue
Parks Parks Comprehensive Plan 2022-2031	Park Acquisition	$2,640,000	Bonds, grants, general funds, Park Impact Fees, Conservation Futures, donations, federal funding, partnerships, state funding
Parks Parks Comprehensive Plan 2022-2031	Project Facility	$17,500,000	Bonds, grants, general funds, Park Impact Fees, Conservation Futures, donations, federal funding, partnerships, state funding
Parks Parks Comprehensive Plan 2022-2031	Park Development	$97,906,000	Bonds, grants, general funds, Park Impact Fees, Conservation Futures, donations, federal funding, partnerships, state funding
Parks Parks Comprehensive Plan 2022-2031	Park Improvements	$2,548,000	Bonds, grants, general funds, Park Impact Fees, Conservation Futures, donations, federal funding, partnerships, state funding

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Parks Parks Comprehensive Plan 2022-2031	Trails Capital Repairs, Planning	$5,937,000	Bonds, grants, general funds, Park Impact Fees, Conservation Futures, donations, federal funding, partnerships, state funding
Parks Parks Comprehensive Plan 2022-2031	Special Facility Development & Improvement	$1,043,000	Bonds, grants, general funds, Park Impact Fees, Conservation Futures, donations, federal funding, partnerships, state funding
Fire & EMS	Fire Stations 3 Construction	$23,865,000	Proposition 2
Fire & EMS	Fire Station 6 Construction	$23,435,000	Proposition 2
Fire & EMS	Retrofit and expand Station 8	$14,265,000	Proposition 2
Fire & EMS	Retrofit Station 4	$1,950,000	Proposition 2
Fire & EMS	Rebuild Station 5	$48,900,000	Proposition 2
Fire & EMS	Fire Station 5 Retrofit	$7,800,000	Proposition 2
Fire & EMS	Fire Station 5 Warehouse	$300,000	Proposition 2
Police	Police Headquarters Land and Building	$40,500,000	Proposition 5
Police	Renovate East Precinct	$12,000,000	Proposition 5
Police	Expand Evidence Storage	$11,900,000	Proposition 5
General Government Long Range Facility Plan	Chkalov renovations	$17,085,000	Proposition 2, ratepayer revenue, general fund
General Government Long Range Facility Plan	City Hall consolidation and maintenance	$14,949,000	Proposition 2, ratepayer revenue, general fund
General Government Long Range Facility Plan	Public Works Operations Center	$225,000,000	Proposition 2, ratepayer revenue, general fund
General Government Long Range Facility Plan	Bridge Shelter	$14,200,000	Proposition 2, ratepayer revenue, general fund

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Solid Waste Comprehensive Solid Waste Management Plan	West Van Transfer Station: Ph 1 Site improvements	$1,400,000	Designated Capital Improvement and Maintenance Restricted Fund, Regional Solid Waste System Fund
Solid Waste Comprehensive Solid Waste Management Plan	Ph 2 Utilities/site work	$2,000,000	Designated Capital Improvement and Maintenance Restricted Fund, Regional Solid Waste System Fund
Solid Waste Comprehensive Solid Waste Management Plan	Ph 2B Expansion for organics and top load	$6,700,000	Designated Capital Improvement and Maintenance Restricted Fund, Regional Solid Waste System Fund
Solid Waste Comprehensive Solid Waste Management Plan	Ph 3 New office center	$1,100,000	Designated Capital Improvement and Maintenance Restricted Fund, Regional Solid Waste System Fund
Solid Waste Comprehensive Solid Waste Management Plan	Ph 4 New recycle/HHW center	$1,500,000	Designated Capital Improvement and Maintenance Restricted Fund, Regional Solid Waste System Fund
Schools – VPS (2022-2028)	Additional capacity for Odgen Elementary and Sacajawea Elementary	$7,425,000	Uncommitted property sale funds, general obligation bonds, state match funds, impact fees
Schools – EPS (2026-2031)	None	N/A	N/A

Service	Major Capital Projects	Estimated Total	Funding Source(s)
Fort Vancouver Regional Libraries (2026-2037) FVRL Comprehensive Facilities Plan	Three Creeks Community Library Renovation	$7,090,000	FVRL Foundation, State of Washington, Library Capital Improvement Program
Fort Vancouver Regional Libraries (2026-2037) FVRL Comprehensive Facilities Plan	Cascade Park Community Library Renovation	$12,000,000	FVRL Foundation, State of Washington, Library Capital Improvement Program
Fort Vancouver Regional Libraries (2026-2037) FVRL Comprehensive Facilities Plan	Vancouver Community Library Capital Maintenance	$5,610,000	FVRL Foundation, State of Washington, Library Capital Improvement Program
Fort Vancouver Regional Libraries (2026-2037) FVRL Comprehensive Facilities Plan	Acquire site for new branch	$1,000,000	FVRL Foundation, State of Washington, Library Capital Improvement Program
City of Vancouver Total	**-**	**$1,508,288,000**	**See above**
Non-municipal Agencies Total	**-**	**$714,660,000**	**See above**

Impact Fees and System Development Charges

Vancouver collects impacts fees for parks and transportation purposes. For planning and funding parklands, Vancouver is divided into three PIF districts. The program establishes LOS standards for urban parks, including neighborhood and community parks and urban open space, and assesses PIFs on new residential development to offset the cost of providing these parks. Additional details are in the Chapter 7, Parks, Recreation & Cultural Services.

The City collects traffic impact fees (TIF) paid at the time of the development application to offset the proportionate system impacts of the proposed added travel demand associated with the proposed project. The City has three TIF districts that consider the unique growth and investment characteristics of each area. The collected TIF from all districts is used to fund TIF eligible projects in any of the three districts. City staff will determine which project will be constructed. A developer

may elect to construct a TIF eligible project as part of their development program and receive a TIF credit for doing so. Recent Washington legislation allows funds collected through the TIF to be used for multimodal projects. As such, the TIF project list has been updated to add walking/rolling and BSM projects from the TSP. Additional details on TIFs can be found in Chapter 8, Transportation and Mobility, as well as in the TSP.

On behalf of the school districts, the City also collects School Impact Fees. The revenue is collected and held in special accounts by the Clark County Treasurer for use by the districts for growth-related capital expenditures. Current School Impact Fees are listed in Table 36.

Table 36. School District Impact Fees

School District	Single-family	Multifamily
Battle Ground	$10,760	$3,845
Camas	$6,650	$6,650
Evergreen	$6,432	$3,753
Vancouver	$2,786	$2,486

Goal: PFS-1 Public Facilities and Services

Vancouver has high-quality public facilities, infrastructure, and utilities that are efficient, well maintained, and meet the needs of a growing population.

Goal PFS-1 establishes the foundation for how Vancouver plans, funds and manages the physical systems that make daily life in the city possible. At its core, the goal commits the City to providing high-quality facilities, services, and utilities that are affordable, efficient, and well maintained, while ensuring these systems evolve with the needs of a growing and changing community. It links long-range land use planning with capital investment, operations, and maintenance, making sure that growth is matched with reliable public infrastructure and services.

A key focus of PFS-1 is access and equity. The goal directs the City to expand access to essential services and amenities—such as community centers, parks, utilities, and public facilities—through both regulation and public investment, with particular attention to underserved areas. Decisions about where to invest are informed by the City's Equity Index, displacement risk analysis, and climate vulnerability data. Facilities and programs that support youth, aging populations, and multigenerational community life are also emphasized, reinforcing the idea that infrastructure is not only pipes and pavement, but also the social spaces that support well-being.

PFS-1 also embeds climate resilience and environmental responsibility into everyday infrastructure decisions. It supports retrofitting existing facilities and natural systems to address climate impacts such as heat, flooding, and water stress, while requiring new development and public projects to incorporate climate-resilient design. The goal promotes water conservation, renewable energy, decentralized infrastructure systems, and reduced emissions from buildings and public facilities. Stormwater management, watershed protection, waste reduction, and environmentally conscious procurement practices further ensure that Vancouver's infrastructure systems protect environmental quality while serving community needs.

Another key dimension is financial stewardship and long-term efficiency. PFS-1 calls for infrastructure to be designed and maintained with life-cycle costs in mind, with the aim of reducing long-term maintenance and replacement burdens. Proportional impact fees and system development charges are used to help recover costs and ensure growth contributes fairly to needed facilities. Periodic reassessment of land use plans and service standards helps the City align

regulations, growth assumptions, and capital planning so that facilities and utilities can keep pace with development.

Supporting Policy	Description	No.	Related Goals
Access to Services and Amenities	Expand access to essential services and amenities, particularly in underserved areas, through regulation and public investment.	4	PFS-1, EI-1, LU-1
Adapt Infrastructure to Climate Change	Retrofit existing infrastructure, parks and natural spaces, and construct new facilities to adapt to the localized impacts that will occur in the community due to climate change.	8	CL-1, PFS-1, PFS-3
Analyze and Mitigate Displacement Risk	Analyze and mitigate for displacement pressures and risks prior to making large-scale public investments.	17	E-1, H-2, H-4, PFS-1
Annexation Agreements Prior to Service Extensions	Continue to require developing or developed unincorporated areas to agree to future annexation as a precondition of the extension of City services.	18	AN-1, PFS-1
Community Centers	Establish multipurpose community centers offering social, recreational, educational, and cultural programming, especially in underserved areas.	30	PR-3, PFS-1
Conserve Water Resources	Encourage water-efficient technologies and practices to reduce consumption and ensure sustainable water availability amid climate change and growing demand.	37	CL-1, CL-4, PFS-1

Supporting Policy	Description	No.	Related Goals
Cost-efficient Infrastructure	Design and maintain infrastructure to reduce long-term maintenance and replacement costs. Consider life-cycle costs, emerging technologies, and the impacts of facility design and material choices in both capital and operating budgets.	**39**	PFS-1, TM-1
Environmentally Conscious Procurement and Maintenance	Include criteria related to the use of environmentally sustainable materials and practices in procurement processes and maintenance contracts.	**51**	PFS-1, CL-3
Equity and Climate Data	Incorporate the City's Equity Index, Displacement Risk Assessment tool, and climate vulnerability assessment in public investment and infrastructure improvement decisions.	**54**	EI-1, PFS-1, CL-1
Improve Connectivity between Parks and Open Spaces	Create an expansive network of linear parks that encourage active transportation, improve community health and well-being, enhance tree canopy and stormwater management, and link parks and open space with housing.	**68**	PR-2, PFS-1,
Climate Resilient Development	Integrate climate resiliency best practices into the City's review of new development.	**72**	CL-1, CL-2, PFS-1
Invest in Underserved Areas	Prioritize infrastructure, housing, and public service investments in underserved neighborhoods and areas of the city that have not benefitted from past investments.	**81**	PFS-1, EI-1
Periodically Reassess Land Use	Assure consistency of overall land use and capital facilities plans by reevaluating Vancouver's land use plan and code to ensure regulations are facilitating intended outcomes and the City is able to provide necessary public facilities and services to implement the plan.	**100**	PFS-1, LU-4

Supporting Policy	Description	No.	Related Goals
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the city's identity, economy, history, and future.	104	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Proportional Fees	Establish proportional impact fees and system development charges based on size of unit for residential uses while ensuring cost recovery.	107	PFS-1, LU-4
Reduce Built Environment Emissions	Reduce emissions from buildings, structures, and infrastructure in the community.	110	CL-3, PFS-1
Reduce Solid Waste	Increase waste diversion rates through a system that minimizes landfill reliance, reduces greenhouse gas emissions, prioritizes composting and encourages resource recovery.	117	CL-1, CL-3, CL-4, EO-3, PFS-1
Regional Infrastructure	Work with local, state, federal and tribal partners to ensure that new construction or replacement of critical infrastructure is planned and designed to avoid community harm and maximize social, environmental, and cultural value.	121	TM-1, PFS-1
Resources for Youth and Aging Populations	Prioritize programs and infrastructure that support youth and aging populations, including safe play areas, accessible housing, robust childcare, public facilities and community programs that foster multigenerational interaction.	125	EI-3, PFS-1
Service Availability and Standards	Consider water, sewer, stormwater, solid waste, police, and schools as necessary public facilities and services. Ensure levels of service sufficient to serve planned development. Establish service standards and planning assumptions for estimating needed public facilities and services based on service capabilities, land use designations, and BMPs.	130	PFS-1

Supporting Policy	Description	No.	Related Goals
Service Transition	Identify strategies for facilitating phased transition of urban services, particularly public safety, transportation, parks, utilities, and land use review. This should include exploration of early application of land use regulations and infrastructure standards to ensure urban level of service in areas developed to urban densities within the VUGA.	**131**	AN-1, PFS-1
Sewer Service	Provide safe and sustainable sewer service throughout the City, connect remaining existing development served by septic to the public sewer system, and manage domestic and industrial wastewater to reduce health hazards and environmental impacts.	**132**	PFS-1
Stormwater Management	Improve water quality, protect watersheds and reduce flood risks by promoting groundwater infiltration, reducing runoff, and advancing effective stormwater BMPs.	**136**	CL-1, PFS-1
Support Active Transportation Investments	Improve active transportation in areas with inadequate mobility infrastructure to increase the share of trips made by foot, bike and other small mobility options, and transit, including better integrating parks and trails into the active transportation network.	**144**	TM-1, PFS-1
Support Decentralized Infrastructure Systems	Support decentralized local energy and water solutions while strengthening community adaptability to environmental, social, and economic changes.	**145**	PFS-1, CE-4, PFS-3
Support the Use of Renewable Energy	Encourage new renewable energy infrastructure and promote development of storage systems to ensure a stable, resilient, and sustainable energy grid.	**151**	CL-3, PFS-1

Supporting Policy	Description	No.	Related Goals
Underdeveloped Lots and Brownfields	Prioritize, facilitate, and incentivize development on infill and underutilized lots, and clean up brownfield sites.	**157**	LU- 3, LU-4, LU-1, PFS-1, CL-4
Water Service	Provide safe, clean, quality drinking water to every home and business, ensure water pressure and volumes necessary to support fire suppression systems. Encourage on-site water reuse systems where practicable.	**161**	PFS-1, PFS-2, PFS-3

Goal: PFS-2 Government Services and Financing

Vancouver's process for funding public services and facilities is transparent and aligns with community priorities as well as state requirements.

Goal PFS-2 focuses on the ways in which Vancouver decides to fund, prioritize, and deliver public infrastructure and government services. While other goals address what systems are built, PFS-2 ensures that the process for making those decisions is inclusive, transparent, and grounded in community priorities. It commits the City to open governance, equitable participation, and coordinated long-term planning so that investments reflect the needs and voices of the full community.

A central component of PFS-2 is aligning funding decisions with adopted plans. The Capital Improvement Program (CIP) is maintained as a key implementation tool, with a prioritization process that ties capital projects directly to the goals and policies of the Comprehensive Plan and other long-range planning documents. This ensures that public dollars are invested in ways that advance the City's vision for land use, mobility, housing, parks, utilities, and climate resilience rather than responding only to short-term pressures. Asset management practices reinforce this alignment by using data and best management approaches to balance lifecycle costs, performance, risk, and service levels, while leveraging past investments to support efficient and equitable growth.

PFS-2 also elevates transparency and public access to information as essential parts of infrastructure planning. The City commits to open, user-friendly platforms that allow residents to understand how decisions are made, how funds are allocated, and how projects are performing. This open government approach strengthens accountability and enables community members to engage meaningfully in shaping public investments. By making data and decision-making processes visible, the City supports informed participation and trust in government.

Supporting Policy	Description	No.	Related Goals
Align Capital Improvement Program with Comprehensive Plan	Maintain a prioritization process that aligns the CIP with the goals and policies of the Comprehensive Plan and other relevant long-term planning documents.	14	PFS-2
Asset Management	Manage City assets to balance full life-cycle costs, performance, risk, and service levels, using BMPs and data. Public infrastructure and facility investments will leverage existing investments to support efficient and equitable growth.	21	PFS-2, TM-1, PR-1
Essential Public Facilities	Plan, site and design essential public facilities through coordinated, equitable, and transparent processes that support regional planning goals, minimize community impacts, and ensure long-term benefit to all Vancouver residents.	55	PFS-2
Open Government	Ensure transparent and equitable access to government data by maintaining open, user-friendly platforms that allow community members to understand, engage with, and influence public decisions and investments.	97	EI-4, PFS-2
Schools	Work with local school districts to provide adequate school facilities, including timely and efficient review processes for new facilities.	128	PFS-2
Values Driven Budgeting	Ensure biennial budget decisions are guided by adopted policy priorities, with programs, projects, and services evaluated and prioritized based on their contribution to achieving those priorities. Require budget narratives and reporting to clearly demonstrate alignment with the City's mission, values, and community benefit, and to transparently document and publish outcomes and impacts.	160	EI-4, PFS-2
Water Service	Provide safe, clean, quality drinking water to every home and business, ensure water pressure and volumes necessary to support fire suppression systems. Encourage on-site water reuse systems where practicable.	161	PFS-1, PFS-2, PFS-3

Goal: PFS-3 Infrastructure Enhances Public Safety

In Vancouver, investments in public services, facilities and infrastructure advance community safety, contribute to the emergency preparedness, and support disaster response.

Goal PFS-3 centers on Vancouver's ability to keep critical systems functioning during emergencies and disruptive events. It commits the City to developing and maintaining resilient infrastructure that can withstand natural hazards, climate impacts, and other shocks, while ensuring emergency services can respond quickly and effectively. This goal links physical system design, public safety services, and community preparedness into a unified resilience framework.

A major focus of PFS-3 is climate adaptation and hazard readiness. The City works to retrofit existing infrastructure, parks, and natural systems, and to design new facilities that respond to localized climate risks, such as heat, flooding, wildfire smoke, and severe storms. Public spaces are designed with climate-resilient features that reduce exposure to hazards and provide safe gathering areas during extreme events. Transportation investments, such as Community Safe Routes, also contribute to resilience by creating safer, more reliable walking connections to transit and key destinations, including during emergencies.

PFS-3 strongly integrates public safety and emergency response systems into infrastructure planning. Coordination with fire and police departments ensures facilities, staffing, and equipment keep pace with growth and are distributed to serve the community equitably. The goal supports investments in emergency services facilities, communications systems, and preparedness efforts that allow rapid response to disasters and day-to-day emergencies alike. Disaster recovery and emergency response planning further ensure that all residents have access to emergency services and recovery resources, reducing risks from natural disasters, climate-related hazards, and social disruptions.

Supporting Policy	Description	No.	Related Goals
Adapt Infrastructure to Climate Change	Retrofit existing infrastructure, parks and natural spaces, and construct new facilities to adapt to the localized impacts that will occur in the community due to climate change.	8	CL-1, PFS-1, PFS-3
Climate Resilient Spaces	Incorporate elements of climate resiliency into new public spaces, buildings, and infrastructure.	29	CL-1, CE-1, PR-1, PFS-3, LU-3
Community Safe Routes	Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.	33	TM-1, TM-2, PFS-3, PR-2, CL-3
Coordinate with Fire and Police	Coordinate with the VFD and VPD to plan for expected growth, equitably serve the community, and facilitate emergency response.	38	CE-3, PFS-3
Disaster Recovery and Emergency Response	Develop plans and resources to ensure effective emergency response and recovery efforts in the event of natural disasters, climate-related hazards, and social disruptions.	43	CE-3, CL-1, PFS-3
Public Safety	Support public safety through investment in emergency services, facilities, infrastructure and coordinated preparedness efforts that strengthen community resilience and response.	109	CE-3, PFS-3

Supporting Policy	Description	No.	Related Goals
Redundancy in Infrastructure	Design, construct, and maintain capital infrastructure systems with resiliency and redundancy to minimize the risk of system failure during natural hazards, climate-related events, or other disruptions. Prioritize investments that diversify supply sources, strengthen backup systems, and enhance adaptive capacity so essential services can be maintained or restored quickly in the event of a failure.	**119**	PFS-3, CL-1
Resilient, Transit-Supportive Infrastructure	Invest in infrastructure that supports reliable, frequent, and accessible transit service as outlined in the Enhanced Transit Network, while adapting to localized climate impacts. Investments should expand mobility options, improve neighborhood access, and deliver health, economic, and social benefits.	**124**	TM-2, PFS-3, EI-2
Support Decentralized Energy Systems	Support decentralized local energy systems while strengthening community adaptability to environmental, social, and economic changes.	**145**	PFS-1, CE-4, PFS-3
Water Service	Provide safe, clean, quality drinking water to every home and business, ensure water pressure and volumes necessary to support fire suppression systems. Encourage on-site water reuse systems where practicable.	**161**	PFS-1, PFS-2, PFS-3

Chapter 9: Key Implementing Actions

- ✓ Finalize and adopt the updated 20-Year Water System Plan.
- ✓ Implement a comprehensive water source PFAS treatment plan.
- ✓ Update and adopt the 20-year General Sewer Plan.
- ✓ Develop and implement the Wastewater Treatment Solids Processing and Renewal Program.
- ✓ Regularly evaluate and update utility rates and System Development Charges (SDCs).
- ✓ Coordinate with Public Works and Parks to add street and park trees in canopy-deficient areas.
- ✓ Coordinate with Clark County and other jurisdictions to implement the County Solid Waste Management Plan (CSWMP).
- ✓ Expand curbside organics and food scrap collection citywide, consistent with RCW 70A.205.540.
- ✓ Update VMC Title 6 to align with updates to the solid waste portion of VMC Title 20.
- ✓ Explore development of a Fire Impact Fee Program.
- ✓ Fill new positions and add equipment funding through Proposition 2.
- ✓ Fill new positions and add equipment funded through Proposition 5.
- ✓ Complete construction of the new operations center.
- ✓ Implement the City's Long Range Facilities Plan.

Annexation



10

Introduction

Annexation is the process by which cities add land to their boundaries to accommodate growth and provide public services. The Growth Management Act (GMA) anticipates that designated Urban Growth Areas (UGAs) will become part of cities over the 20-year time horizon of the Comprehensive Plan, and that cities are the appropriate provider of urban services.

The Vancouver Urban Growth Area (VUGA) is the largest UGA in the state by population, with an estimated 170,000 residents. Like the City of Vancouver, the incorporated VUGA is increasingly diverse and has experienced recent economic growth that exceeds what has happened in the rest of the overall Portland-Vancouver metropolitan region. It has a higher rate of homeownership, a higher medium income, and a higher average age than Vancouver overall. Annexation of the full VUGA would make Vancouver the second largest city in the state. The scale and complexity of Vancouver's UGA and the extent that it is already developed to urban densities presents both opportunity and challenge. Annexation is an opportunity to align land use and infrastructure planning across a larger area to meet key community and policy objectives and more efficiently deliver services. However, the City will bear the cost of serving annexed areas, addressing deferred maintenance and upgrading substandard infrastructure. Fiscal sustainability is a major challenge to large-scale annexation of VUGA.



Vision: Annexation

Vancouver will continue to manage urban growth by annexing urbanized areas within the Vancouver Urban Growth Area in an orderly way that is fiscally sustainable and maintains adopted levels of service. By coordinating with partners, addressing baseline conditions, and making targeted investments that support smooth service transitions, Vancouver will successfully integrate future annexed areas into the city's urban fabric and strengthen our shared sense of identity.

From a fiscal perspective, annexation has historically been most feasible in areas with a strong commercial or employment base that can help offset the cost of serving adjacent residential areas. However, large portions of the VUGA consist of single-family residential neighborhoods that lack nearby commercial services, have auto-oriented development patterns, and public infrastructure that does not meet urban standards. Level of service standards in unincorporated UGAs typically fall below those provided in incorporated areas. In these areas, the long-term cost of providing urban services can significantly exceed anticipated revenues, making annexation difficult to justify without additional funding mechanisms or phased service strategies. In addition, as costs increase, the unfunded liability associated with substandard infrastructure continues to grow.

Key Annexations

Since the mid-1990s, the City has pursued annexation incrementally. Annexations during this period reflect a mix of large, population-serving annexations and smaller, targeted annexations for municipal or employment purposes.

- **East Vancouver (1997)**

  One of the City's largest annexations, East Vancouver nearly doubled the population of the city and represented a major step toward implementing the UGA concept. This annexation established a precedent for coordinating service delivery and infrastructure investment in urbanized areas previously under county jurisdiction.

- **Section 30 (2008)**

  Annexation of this area supported industrial and employment uses, strengthening the City's economic base and aligning land use regulation with infrastructure and service provision.

- **Alcoa/Port of Vancouver Remnant Parcels (2009)**

  These targeted annexations brought key employment and industrial parcels into city limits, improving regulatory consistency and supporting port-related economic activity.

- **Vancouver Operations Center (2023)**

  This recent annexation reflects the continued use of annexation for municipal purposes, ensuring that the new City operations center currently under development is strategically located to serve the existing community, as well as future growth.

- **Van Mall North (2017)**

  This annexation incorporated a large, mixed residential and commercial area, adding approximately **5,500 residents**. Van Mall North illustrates the City's emphasis on annexing areas that combine residential areas with nearby commercial and employment uses.

Smaller Annexations and Boundary Refinements

Over time, Vancouver has also completed smaller annexations in response to property owner requests. While these annexations typically added little or no population, they result in small, incremental jurisdictional boundary adjustments.

Annexation Process

Annexation in Washington State is governed by state statute and shaped by the GMA, which together establish where and how cities may expand their boundaries. In counties planning under the GMA, annexation is generally limited to areas within a designated UGA and must occur in a coordinated, contiguous, and orderly manner. These requirements reinforce the GMA's intent that cities serve as the primary providers of urban services and that counties avoid long-term provision of urban services within UGAs. Washington law provides multiple methods for annexation, each with distinct initiation requirements, approval processes, and applicability depending on local conditions.

Methods

- **Property-owner petition methods** - most often requiring owners representing a threshold of assessed property value to initiate annexation
- **Election-based annexation -** which require approval by voters within the proposed annexation area
- **Annexation of unincorporated islands** - a streamlined process for enclaves that are largely surrounded by city limits
- **Annexation by interlocal agreement** - allowing cities and counties to negotiate annexation terms for urbanized areas
- **Municipal-purpose annexations** - used to incorporate City-owned property needed for public facilities

Key Evaluation Factors

Regardless of the annexation method used, proposed annexations must be evaluated against a consistent set of planning and service considerations:

- **Consistency with the Growth Management Act**, including the requirement that annexations occur within UGAs and support planned urban growth patterns
- **Alignment with countywide planning policies**, which establish expectations for coordinated growth, annexation sequencing, and transition of urban services
- **Fiscal sustainability**, including the City's ability to fund expanded services, address infrastructure deficits, and maintain adopted LOSs without adverse impacts to existing residents
- **Infrastructure readiness**, including the capacity and condition of transportation systems, utilities, parks, and other public facilities
- **Logical boundaries and service areas**, avoiding fragmented jurisdictions, irregular boundaries, or inefficient service delivery arrangements

These considerations help ensure that annexation decisions advance long-term planning objectives rather than responding solely to short-term development or boundary pressures.

Intergovernmental Coordination and Service Transitions

Coordination with Clark County and affected service providers is a foundational element of the annexation process. Prior to annexation, counties often adopt development regulations that are consistent with the City, while cities plan for eventual assumption of service responsibility. Annexation requires careful planning to ensure continuity of services, such as public safety, transportation, utilities, and land use regulation. State law and administrative guidance encourage the use of interlocal agreements to manage these transitions, particularly where annexation will affect special purpose districts, such as fire, utility, or library districts. These agreements may address service timing, infrastructure standards, revenue impacts, and phased transitions to City service provision. Countywide planning policies further guide this coordination by establishing shared expectations for how annexation supports regional growth management objectives.

Community Feedback

- Strong need for clear, transparent information about annexation—how it works, when it will happen, and what it means for services, zoning, taxes, and growth targets.
- Mixed ideas on whether and where annexation should occur.
- Concerns that annexation could increase traffic, pollution or taxes and change the feel of suburban and semi-rural areas.
    - Others feel "in limbo" outside city limits and want representation and consistent services.
    - Desire for annexation to support sustainable, balanced growth with urban level services, logical boundaries, and coordination with the county to ensure adequate police, fire and infrastructure.

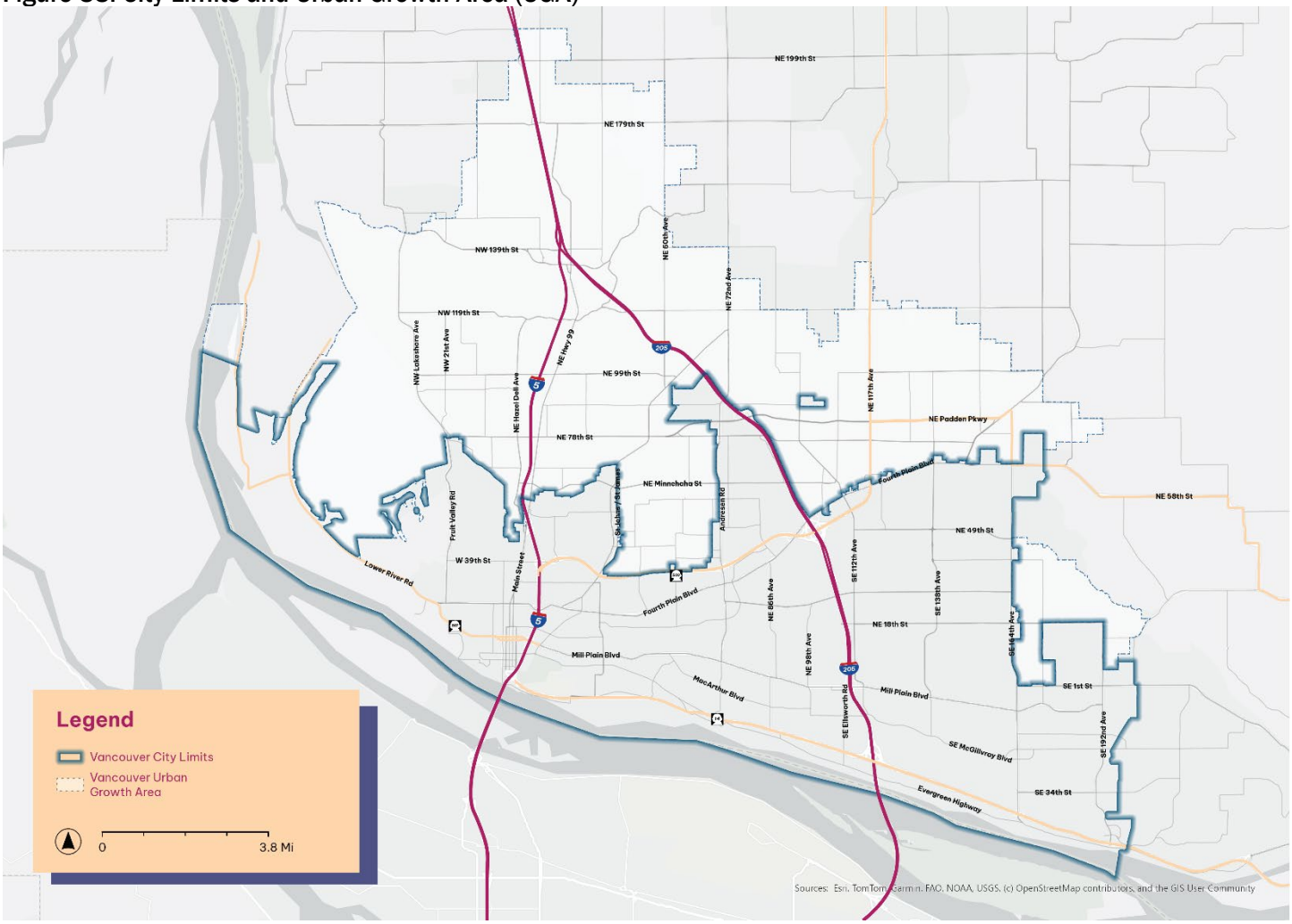
Adapting to Changing Conditions

The City adopted an Annexation Blueprint Plan in 2007 that identified a phased annexation schedule, but this was quickly followed by the Great Recession and largely went unimplemented. Since that time, on the ground conditions in the VUGA have continued to evolve, as have state rules that govern annexation processes. Vancouver's approach to annexation recognizes this evolving context and acknowledges structural deficiencies that make annexation difficult to pursue. The City will continue to evaluate annexation opportunities using available statutory tools while emphasizing coordination, fiscal responsibility, and transparent decision making. Annexation is viewed not as a single event, but as a planned transition of governance and services that must align with long-term growth management, infrastructure investment, and community expectations.

The impact of annexation on currently unincorporated areas also continues to evolve. Many residents of the unincorporated Vancouver Urban Growth Area (VUGA) and the City of Vancouver do not know where the boundary between each jurisdiction is located and see the built environment and

associated infrastructure as one continuous fabric. Different levels of service mean some residents feel that they are underserved or ignored, and different infrastructure standards leave people feeling confused about why certain areas are designed one way and others not. It is not uncommon for community members to seek positions on City boards and commissions without realizing they don't actually live in the city and are thus not eligible, as they are nonetheless impacted by City decisions. Incorporation into the City of Vancouver will provide residents of the VUGA with greater influence over City decisions as well as urban level of service standards.

Figure 33: City Limits and Urban Growth Area (UGA)



Goal: AN-1 Facilitate Annexation of the Urban Growth Area (UGA)

The annexation of urbanized areas within the Vancouver Urban Growth Area into city limits will occur in a coordinated, orderly and timely manner.

Goal AN-1 establishes annexation as the primary mechanism for transitioning urbanized areas within the VUGA into the city in a coordinated, orderly and timely manner. Lands designated within the UGA are planned to accommodate urban development and, over time, to be incorporated into the city so that governance, land use regulation, and service delivery align with urban conditions and community expectations.

Under this goal, annexation is intended to support a cohesive and efficient urban environment by establishing clear and logical jurisdictional boundaries. The City prioritizes annexation patterns that promote contiguous growth, reduce fragmented governance, and create functional service areas capable of supporting urban levels of service. Larger, coordinated annexations are emphasized where they improve regulatory consistency, streamline long-term service provision, and advance annexation within the planning horizon anticipated by the GMA. At the same time, property-owner-initiated annexations adjacent to city limits will continue to be facilitated when they are consistent with these broader principles and contribute to orderly growth.

Implementation of Goal AN-1 relies on sustained coordination with Clark County and other service providers, and pre-annexation adoption of City infrastructure and regulatory standards. Annexation is viewed not as a single boundary action but as a planned transition of governance and services that must be carefully sequenced and managed over time. This includes coordinating land use designations, infrastructure standards, and service responsibilities so that areas expected to urbanize can do so in a predictable and well-managed manner.

Through clear sequencing, service transition planning, and intergovernmental collaboration, the City will pursue annexation that supports long-term regional planning objectives, strengthens regulatory consistency, and integrates future annexed areas into the city's urban fabric. Goal AN-1 reinforces the City's commitment to managing growth proactively and transparently, ensuring that annexation contributes to a unified, well-governed city over time.

Supporting Policy	Description	No.	Related Goals
Annexation Agreements Prior to Service Extensions	Continue to require developing or developed unincorporated areas to agree to future annexation as a precondition of the extension of City services.	18	AN-1, PFS-1
Annexation Appropriateness	Evaluate potential annexations to ensure they support the City's ability to provide and maintain adopted levels of service. Annexations should proceed only when they do not result in a reduction of service levels for existing residents and when necessary urban services can be provided in a timely, efficient, and financially sustainable manner.	19	AN-1
Annexation Boundaries	Annexation agreements should promote large annexations, efficient service delivery, the provision of necessary infrastructure, and clear jurisdictional boundaries. This includes contiguous areas and both sides of roads and streets and associated rights-of-way. Individual property owners should not be prevented from pursuing annexation, and requests should be facilitated when immediately adjacent to Vancouver city limits.	20	AN-1, AN-2
Intergovernmental Coordination of Annexation	Work with Clark County to facilitate annexation of the unincorporated Vancouver Urban Growth Area in a coordinated and orderly manner. Coordination should include County adoption of development regulations and infrastructure standards for the VUGA that are consistent with those of the City of Vancouver, agreements to maintain existing infrastructure prior to annexation, community engagement in annexation planning and implementation, and generally advance Vancouver as a provider of urban services and Clark County as a provider of social and regional services.	80	AN-1

Supporting Policy	Description	No.	Related Goals
Limit UGA Expansions	Rigorously review any requests for future VUGA expansions to those clearly necessary to address forecasted population growth and associated housing and job needs, to reduce future annexation burdens, and to foster efficient long-term urbanization given finite countywide land supplies. Modeling of growth and associated land capacity needs should utilize generally acceptable best practices and reflect reasonable assumptions.	**83**	AN-1, AN-2
Service Areas	Work with Clark County, utility districts, and other regional service providers to ensure reasonable, efficient and fiscally sustainable service area boundaries and provide urban levels of service throughout planned annexation areas. Explore regional district service provision models that could lead to greater efficiency.	**129**	AN-1
Service Transition	Identify strategies for facilitating phased transition of urban services, particularly public safety, transportation, parks, utilities, and land use review. This should include exploration of early application of land use regulations and infrastructure standards to ensure urban level of service in areas developed to urban densities within the VUGA.	**131**	AN-1, PFS-1
Timing of Annexation	Coordinate with Clark County to establish annexation sequencing, agreements and timelines that facilitate annexation of the full Vancouver Urban Growth Area within the 20-year time horizon anticipated in the Growth Management Act.	**153**	AN-1

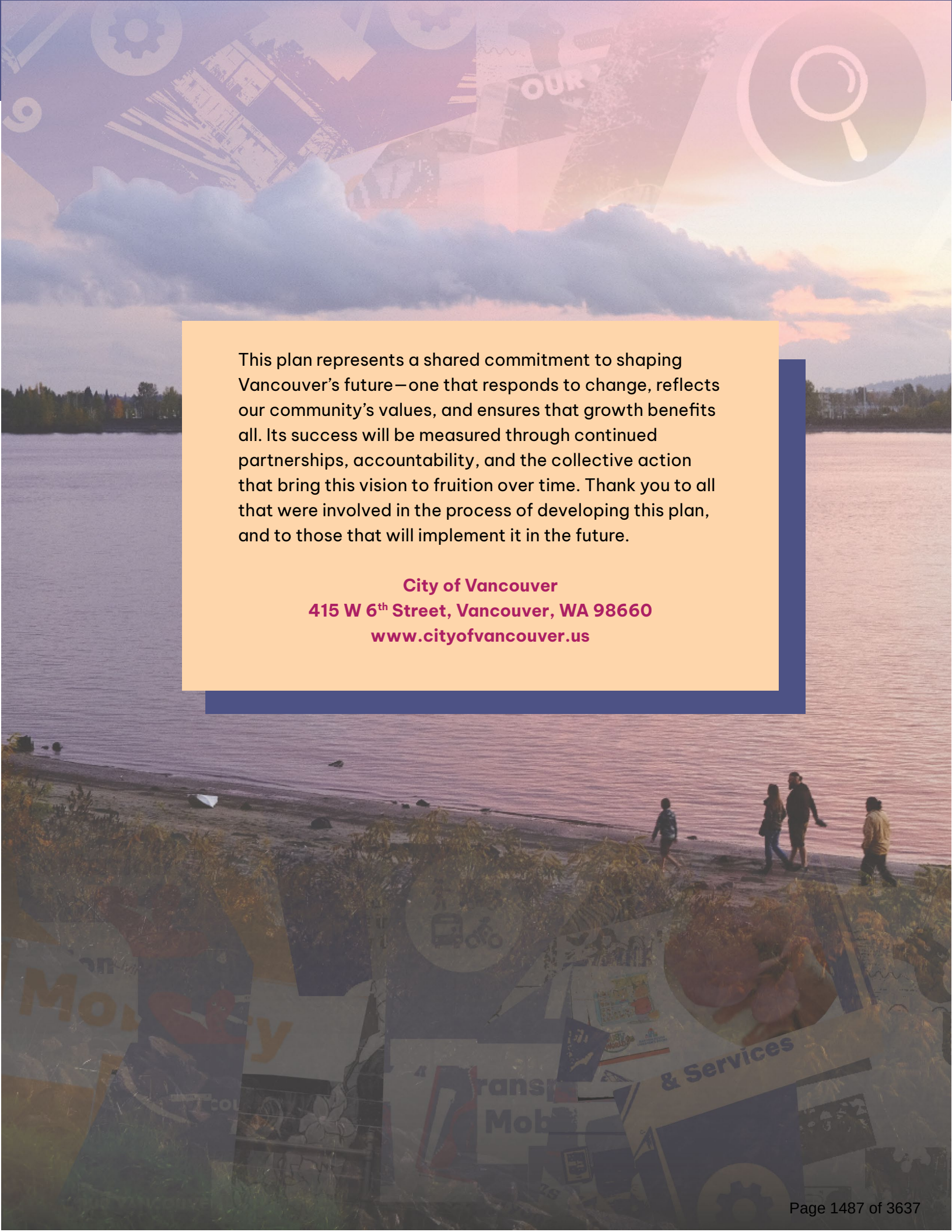
Goal: AN-2 Fiscally Sustainable Annexations

Facilitate balanced annexations that are fiscally sustainable for both the county and the city. Future annexations will support fiscally sustainable and quality service delivery for both existing and future residents.

Goal AN-2 ensures that annexation decisions are implemented in a fiscally responsible manner that maintains adopted LOSs for both existing and future residents. As annexation expands the City's responsibility for public services and infrastructure, careful evaluation of costs, revenues, and service capacity is essential to avoid unintended fiscal impacts. Under this goal, annexation proposals are evaluated based on infrastructure readiness, service demands, long-term operating costs, and the City's capacity to provide and sustain urban LOSs. Particular attention will be given to baseline conditions in annexed areas, including deferred infrastructure needs and capital investments required to meet City standards. Annexations should proceed only when they do not diminish service levels elsewhere in the city and when service transitions can be managed efficiently.

Recognizing that fiscal constraints can limit annexation feasibility, the City will work collaboratively with Clark County and regional partners to pursue additional funding mechanisms and implementation tools. This state-level advocacy is intended to support more balanced annexations over time, particularly in areas where service needs and revenue capacity are misaligned. Through this approach, Goal AN-2 supports equitable, sustainable annexation that strengthens the City's long-term financial and service delivery capacity.

Supporting Policy	Description	No.	Related Goals
Annexation Boundaries	Annexation agreements should promote large annexations, efficient service delivery, the provision of necessary infrastructure, and clear jurisdictional boundaries. This includes contiguous areas and both sides of roads and streets and associated rights-of-way. Individual property owners should not be prevented from pursuing annexation, and requests should be facilitated when immediately adjacent to Vancouver city limits.	20	AN-1
Fiscal Sustainability of Annexation	Evaluate proposed annexations to ensure they are fiscally sustainable and support the City's ability to provide, operate, and maintain adopted levels of service over time. Annexations should proceed only when they do not reduce service levels for existing residents and when required urban services can be delivered in a timely, efficient, and financially sustainable manner.	60	None
Limit UGA Expansions	Rigorously review any requests for future VUGA expansions to those clearly necessary to address forecasted population growth and associated housing and job needs, to reduce future annexation burdens, and to foster efficient long-term urbanization given finite countywide land supplies. Modeling of growth and associated land capacity needs should utilize generally acceptable best practices and reflect reasonable assumptions.	83	AN-1



This plan represents a shared commitment to shaping Vancouver's future—one that responds to change, reflects our community's values, and ensures that growth benefits all. Its success will be measured through continued partnerships, accountability, and the collective action that bring this vision to fruition over time. Thank you to all that were involved in the process of developing this plan, and to those that will implement it in the future.

City of Vancouver
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Appendix A: Related Plans and Policies

Related plans and policies provide background information and policy directives that inform and support Comprehensive Plan analyses, goals, policies, and implementation steps.

**Adoption by Reference:* some Plans listed below fulfill statutory requirements of Comprehensive Planning under the Growth Management Act. The Adopted by Reference notation below refers to the most current version of each plan, as subsequently amended from time to time.

- 2023-2029 City of Vancouver Strategic Plan *(*Adopted by Reference)*
- City of Vancouver Climate Action Framework (CAF), adopted 2022 *(*Adopted by Reference)*
- Housing Action Plan
- Reside Vancouver Anti-Displacement Plan, 2023
- City of Vancouver 2019-2023 Consolidated Housing and Community Development Plan
- 2025 Action Plan Economic Prosperity and Housing
- 2022-2031 Vancouver Parks, Recreation and Cultural Services (PRCS) Comprehensive Plan *(*Adopted by Reference)*
- Culture, Arts and Heritage Plan, adopted 2018
- Five Year Economic Development Strategy, adopted 2025
- Vancouver Moves: 2024-2044 Transportation System Plan (TSP), adopted 2024 *(*Adopted by Reference)*
- 2026-2031 Transportation Improvement Program (TIP)
- Stormwater Management Program Plan (SWMP Plan), adopted 2025
- 2011 General Sewer Plan, update in process, adoption anticipated 2026-2027
- 2026-2031 Water, Sewer and Surface Water Capital Improvement Program (CIP)
- 2016 Comprehensive Water System Plan, amended 2022, update in process, adoption anticipated 2026-2027
- Long Range Facilities Plan
- Map of Existing Vancouver Public Schools
- Map of Evergreen Public Schools
- Urban Forestry Management Plan (UFMP), adopted 2023 *(*Adopted by Reference)*

- Shoreline Master Program, adopted 2011, last amended 2021
- Critical Areas Ordinance, adopted 2024 VMC 14.26, VMC 20.740
- Fourth Plain Subarea Plan *(*Adopted by Reference)*
- 112th Avenue Corridor Subarea Plan *(*Adopted by Reference)*
- Central Park Subarea Plan *(*Adopted by Reference)*
- Evergreen and Grand Commercial Corridors Strategy *(*Adopted by Reference)*
- Fourth Plain Forward *(*Adopted by Reference)*
- Fruit Valley Subarea Plan *(*Adopted by Reference)*
- The Heights District Subarea Plan *(*Adopted by Reference)*
- Lower Grand Employment Area Action Plan
- Riverview Gateway Subarea Plan *(*Adopted by Reference)*
- Section 30 Subarea Plan *(*Adopted by Reference)*
- Waterfront Gateway
- Other Jurisdictions and Agencies Policies
- Countywide Planning Policies *(*Adopted by Reference)*

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OUR VANCOUVER

OUR FUTURE 2045

EQUITY FRAMEWORK

Prepared by Seva Workshop

December 18, 2023

Introduction

The Vancouver Comprehensive Plan is one of our community's most important tools to help plan for the future. It provides the overall long-term vision and policy direction for managing the built and natural environment in Vancouver, and providing necessary public facilities. State law establishes the elements that cities with fast-growing populations must plan for, such as land use, housing, utilities, and transportation. While minor updates may be made as frequently as once a year, in 2023, the City of Vancouver embarked on a full Comprehensive Plan update to review and revise the entire plan to guide growth and development through 2045. This update is a major opportunity to integrate equity throughout the Plan.

Why Have an Equity Framework?

Comprehensive plans are major drivers of whether communities are equitable or not because they guide the distribution of rights and resources. Without an intentional focus, plans are likely to continue current inequities. An Equity Framework summarizes the process and principles for planning teams to consider equity in their technical work.

Equity Definition

Equity. A state or system of fairness or justice that recognizes and balances different challenges, opportunities, and needs across groups of individuals.

Equity Principles

- Understand and acknowledge the City's full historical context, including past harms and seek opportunities to rectify them.
- Think beyond individual programs and projects to institutionalize equity in sustainable and meaningful ways.
- Prioritize communities that have historically been marginalized in future visioning for the built environment.
- Engage the community in creative ways that create a shared sense of vision, empowers people, and creates learning opportunities, trust, and relationships that last beyond this project.
- Be explicit about systemic racism in planning and the racial disparities that persist, in part because of this.

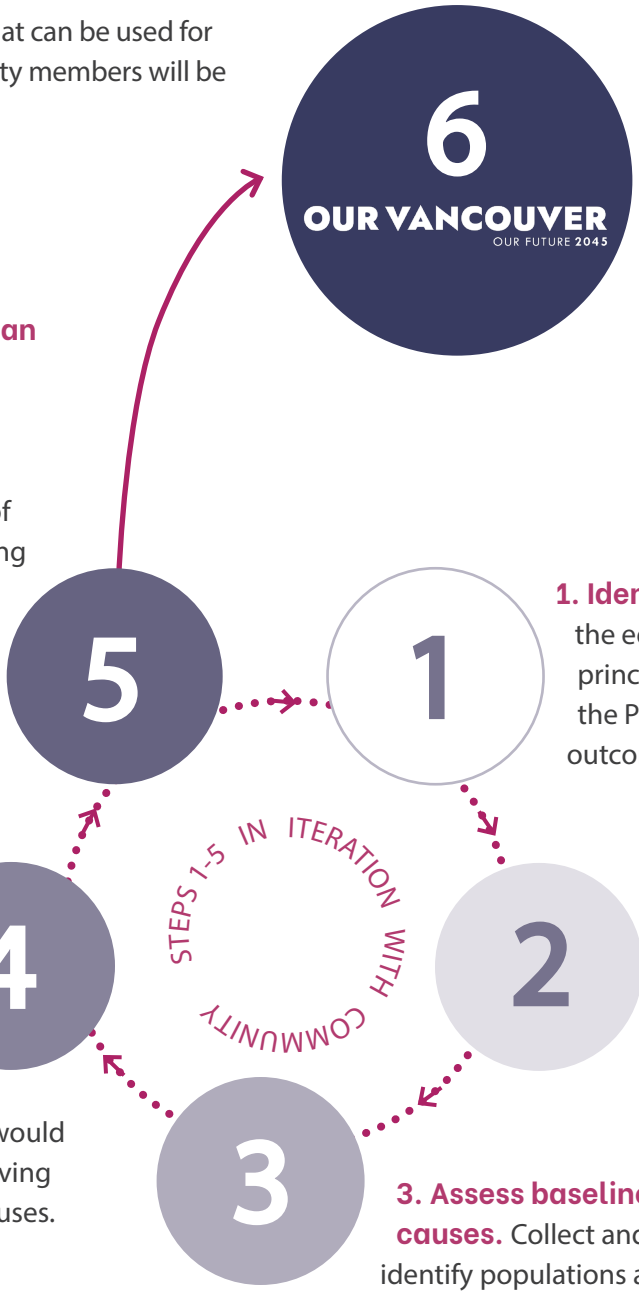
Priority Communities

The accompanying Equity Analysis and Equity Team discussion identified these communities as historically marginalized and/or most vulnerable. These groups will be centered in the engagement and planning process.

- BIPOC community
- People with low incomes
- People with disabilities, including neurodivergent
- Youth and children
- LGBTQ+ individuals
- Renters
- People without an address/ people experiencing homelessness
- Small business owners
- Refugees
- Undocumented population
- Formerly incarcerated population

Comprehensive Plan Framework

The framework is a simple process that can be used for every element of the Plan. Community members will be engaged at each step.



6. Implement with transparency and accountability. Communicate the outcomes and continue engaging community members who have contributed to the planning process.

5. Analyze and refine goals, policies, and strategies with an equity lens. In partnership with community, ask:

- Who benefits and who is burdened by implementation of this policy? Does this policy bring the City closer to equity?
- What are potential unintended impacts of this policy? How can we monitor and mitigate these impacts?

1. Identify outcomes. Apply the equity definition and principles (previous page) to the Plan element to identify key outcome(s) of interest.

2. Develop metrics. Identify a measurable way to know if the outcome(s) is (are) achieved.

3. Assess baseline for gaps and root causes. Collect and analyze data to identify populations and regions farthest from achieving the desired outcome according to the metrics. Build on the context and conditions analysis. Investigate disparities for their root causes (in other words, ask "why") and identify the gaps that are within the City's influence.

4. Propose goals, policies, and strategies. Develop goals, policies, and strategies that would bring the City closer to achieving equity by addressing root causes.

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Equity Framework

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EQUITY ANALYSIS

Prepared by Seva Workshop
March 2024

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Introduction

The City of Vancouver is a growing city of an estimated 188,331 individuals (2021) in Clark County of Southwest Washington. Growth has been especially rapid in the latter half of the last decade when the population increased by 11% compared to the first half when it grew by 5%. The city has also grown in the proportion of residents who are people of color (POC). In 2021, just over 30% of the population was POC compared to 23% a decade earlier.

The Vancouver Comprehensive Plan is one of our community's most important tools to help plan for future growth. It provides the overall long-term vision and policy direction for managing the built and natural environment in Vancouver, and providing necessary public facilities. State law establishes the elements that cities with fast-growing populations must plan for, such as land use, housing, utilities, and transportation.

While minor updates may be made as frequently as once a year, in 2023, the City of Vancouver embarked on an ambitious update to its existing comprehensive plan—determining a new path forward for growth and development out to 2045. This update is a major opportunity to integrate equity throughout the plan.

This document includes context and conditions analysis that helps identify which communities have been historically marginalized* and which communities are most vulnerable to displacement and policy changes. These communities should be prioritized in future planning to address past inequities.

This equity analysis references 5-year estimates of 2017–2021 American Community Survey (ACS) data. The Housing Needs Assessment uses 1-year estimates of 2021 ACS data. More recent documents may reference 2022 data released after this document was completed.

* To be marginalized is to be treated as insignificant by those in power, including municipal government.

Highlights from Equity Analysis

The City of Vancouver's Comprehensive Plan, Our Vancouver 2045, will address several crucial topics related to the city's future growth and development through technical analysis and community engagement. These topics include housing; land use, development, and infrastructure; equity, and opportunity; and climate and environment. The equity analysis provides a foundation from which planners and their community partners can understand the shifting dynamics of the city and design community engagement and analysis to plan the future of the city together.

In addition to the fundamental aim of accommodating growth, the Equity Team has highlighted affordable housing, transportation infrastructure, and the need for reparative policies to undo past harms as equity goals for the planning process. Here we summarize a few important themes to contextualize these goals.

Vancouver is a relatively affordable community for the region, attracting young workers and single-person households. However, the city has become less and less affordable in recent years. First-time renters and owners report difficulty gaining entry to the housing market, while longer term residents report that they would not have been able to access housing under current conditions. Compared to the State of Washington overall, Vancouver residents are less likely to be in married couple households, and more likely to be single female householders with no spouse or partner. The community also has a relatively high number of young people between 25 and 29 years of age. Vancouver is part of the Portland-Vancouver-Beaverton-Hillsboro, OR-WA Metropolitan Statistical area which has one of the country's highest proportions of individuals identifying as LGBTQ at 6.1% (second only to San Francisco).

The City of Vancouver is experiencing shifting demographics, just over 30% of the population is POC compared to 24% in 2011. Compared to the State, Vancouver residents are slightly more likely to have moved recently. Residents identifying as white alone, Black, or American Indian and Alaska Native have declined as a share of the total population over the last decade. Native Hawaiian and Other Pacific Islanders and Hispanic or Latino groups are increasing as a share of population, as are those of two or more races.

People of color are more likely to live within City of Vancouver boundaries than in other parts of Clark County. Within Vancouver, pockets around Fruit Valley, Fourth Plain and East Mill Plain house the greatest proportions of POC. However, these pockets differ by race and ethnicity within POC. For example, Asian residents are relatively more concentrated in the eastern parts of the city, while Hispanic/Latine residents are proportionately more likely to reside in Fourth Plain and Fruit Valley areas.

Over fifteen percent of resident households are living below the federal poverty line. Extreme rates (over 50%) of early childhood poverty are found in a few neighborhoods within city boundaries, including Bagley Downs and Meadow Homes and southeast. These are also areas with relatively high rates of POC residents.

Vancouver neighborhoods vary greatly in terms of access to high quality public schools, access to parks and open space, access to affordable healthy food, and tree cover, creating disparities by race and ethnicity. For example, Sacajawea Elementary School has 93.2% students arriving kindergarten ready, while Harmony Elementary has 17.5%. There are significant pockets of Vancouver outside of 10-minute walk to parks. Tree cover by neighborhood ranges from a high of 47% in South Cliff to 9% in Esther Short. Neighborhoods with higher proportions of POC have 2.4% less tree cover than the city average. These areas often coincide with areas that are low-income and low in access to food, contributing to cycles that further entrench poverty and disadvantage.

Residents' race is associated with different median incomes, as well as housing cost burden and likelihood of owning a home. The median household income where the householder is Black or African American, for example, is over $24,000 less than the overall median. On the other hand, households with an Asian head of household have a median income that is over $24,000 more than the overall median.

The rental market predominates in Vancouver where the rates of owner-occupied housing (51%) are much lower compared to Washington State (64%).[1] Asian residents are the most likely to live in owner-occupied housing (71%), roughly twice as likely as other POC groups. Renting households are more likely to experience cost-burden, and severe cost-burden. Overall, as of 2022 there are 85,511 housing units in Vancouver.

Over two-thirds of the lowest income households are paying more than half their income for housing. In addition to lower home ownership rates, Black and Hispanic/Latine headed households are the most likely to be experiencing housing cost burden and therefore displacement risk.

Housing stock increased by 15% between 2011 and 2021, slightly lagging population growth of about 17% over the same period. The housing mix has remained over half detached single family residential with some shift to larger developments within multifamily housing. Nearly half (46%) of Vancouver's renting households are cost burdened, and 20% severely so. Asian residents are disproportionately likely to live in detached single family housing. Black, Hispanic and Latine, and Native Hawaiian and Other Pacific Islander, and those of other or two or more races are more likely to live in multifamily.

A significant proportion of households, 7.3%, are without access to a vehicle, though Vancouver is a relatively car-dependent city. 83% of workers take a vehicle to work, alone or using a taxi or carpool. Another 12% of workers work from home. Only 3% of workers take public transportation and the likelihood of using public transportation to go to work decreases as income increases.

As illustrated in the equity analysis, Vancouver's planning and equity goals are deeply intertwined. Race and ethnicity intersect with income and wealth, and therefore determine the available housing and neighborhood choices. Neighborhoods in turn vary greatly in access to amenities, infrastructure, and social supports - in other words - quality of life. Creating an equitable city will require focused attention on the neighborhoods and communities farthest from opportunity.

Context and Conditions

This context and conditions analysis helps identify which communities have been historically marginalized and which communities are most vulnerable to displacement and policy changes. First, A Brief History of Vancouver and Housing Exclusion provides historical perspective on land use and housing dating to when the area was first settled. Following that, A Current Profile of City of Vancouver Residents presents data from the last decade on demographics. Finally, demographic intersections with community outcomes, such as income, education, and quality of life indicators are presented.

A Brief History of Vancouver and Housing Exclusion

The Chinook, Vancouver's First Peoples

Indigenous people have lived in what is now known as Vancouver, Washington since time immemorial. For at least 10,000 years before the arrival of European-Americans, the Chinook people made their homes along the north bank of the "Wimahl" River, or "Big River," near its confluence with Oregon's Willamette River.[2] Before contact with white explorers, the Chinook people lived in large rectangular houses made of cedar planks, located in towns close to the water.[3] Rich in salmon, plants, and berries, the Chinook lived in relative abundance and became prolific traders. Cowlitz and Klickitat tribes also lived in the nearby region.

European explorers first reached the shores of Washington in the 16th and 17th centuries but did not have significant lasting contact with the Chinook until the late 1700s.[4] Despite this, smallpox and other diseases began to decimate the Tribes of the Pacific Northwest (including the Chinook) beginning in the mid-1700s. The first American ships to enter the mouth of the "Wimahl" River arrived in 1792 under the command of Captain Robert Gray, who renamed

the waterway the Columbia River after his ship, the Columbia Rediviva.[5] Over the ensuing decades, the region was opened to the influence of European-American fur traders and maritime explorers. These white newcomers and the waves of disease they brought with them devastated Chinook society. When Lewis and Clark visited what is now Vancouver in 1805, they estimated that there were approximately 400 Chinooks living around Cape Disappointment (already a significantly decreased number due to the epidemics of the mid-18th century). By 1830, that population was down to a mere 30–40 people.[6]

Today, the Chinook Indian Nation is made up of five constituent tribes—the Clatsop and Cathlamet (Kathlamet) of present-day Oregon and the Lower Chinook, Wahkiakum (Waukikum) and Willapa (Weelappa) of what is now Washington State.[7] In 2001, after over a century of advocacy by Tribal members, the Chinook Indian Nation was granted federal recognition as a Tribe. However, this recognition was revoked in 2002. Without federal recognition, the approximately 3,000 members of Chinook Indian Nation do not have legal protections or benefits as American Indians, including support for housing or reservation land.[8]

1800s: Hudson's Bay Company and Early Non-Native Settlement

In 1825, the British Hudson's Bay Company (HBC) opened Fort Vancouver on the future site of the City of Vancouver.[9] The Fort quickly expanded beyond a mere fur trading post; soon, it was the center of commerce for the entire region—boasting the first school, first library, and first theater in what is now Washington State.[10] By the 1840s, it was home to the largest concentration of people on the west coast. The trading operations at Fort Vancouver brought with them a robust and diverse group of inhabitants. While HBC officers and clerks lived inside the stockade, other workers and their families lived outside the fort, mostly in the Kanaka Village to the northwest. The word "Kanaka" comes from the Hawaiian word for "people," so named because of the many Hawaiian Islanders who came to work here, brought on fur trading ships that stopped in Hawaii on



Fort Vancouver, 1845 Sketch by Lt. Henry Warre (UW Special Collections, WAS0374)

their way back from China.[11] This village of roughly 1,100 people was described as "a boisterous little community... where the [Hudson's Bay] Company employees of lower rank—Iroquois, Hawaiian, French métis—lived with their Indian wives and families."[12]

The mid-1800s saw a great deal of change to the area. The first American settlers arrived in 1844. The HBC was not immediately hostile to the new arrivals, but encouraged them to settle south of the Columbia River rather than in modern-day Vancouver. After the US-Canadian border was settled at 49°N in 1846, Fort Vancouver declined in significance as HBC moved its operations further north, safely into British territory. In 1849, the US Army began building their own barracks, leading to a flood of American settlers. Although technically illegal in the American West, these new military officers sometimes brought with them the "peculiar institution" of slavery—arriving with personal servants who were barely distinct from slaves.[13]

In 1850, just 220 people lived north of the Columbia River in modern-day Vancouver, compared to nearly 12,000 people living south of the river in what is now Portland.[14] Washington Territory was officially formed in 1853 and the incorporation of the City of Vancouver followed shortly thereafter in 1857, making it one of the territory's first incorporated cities. By 1880, it was the third most populous town in Washington Territory with 1,722 residents.[15]

Although most of these residents were European-Americans, there were also new non-white arrivals to Vancouver in the late 19th century. Records show that, throughout the 1880s and 1890s, several groups of Chinese immigrants were hired for labor crews in or near Vancouver.[16] Generals and perhaps other officers at Vancouver Barracks sometimes had domestic staff of Chinese ancestry. For example, General Oliver Otis Howard employed cook Mick Lai from China, who lived in the upstairs back of his home.[17] Notably, 1899 also saw the arrival of a company of 103 Buffalo Soldiers—segregated black calvary troops—from the U.S. Army's 24th Infantry. This regiment was treated with suspicion and hostility from some in the Army and in Vancouver's white community. The regiment was demoted from its leadership position as soon as white replacements arrived. [18]

Early 20th Century: Slow Growth and National Trends

In the decades before World War II, Vancouver, like the rest of the nation, contended with labor strife, Prohibition, Depression, and changing social dynamics. Despite the 1908 arrival of the train, Vancouver and Clark County remained primarily agricultural (particularly prunes) until the 1940s. The economy was also driven by logging, lumber mills, and the railroad. By 1920, the population of Vancouver was around 12,600. Although the vast majority was white, census rolls showed a small percentage of African American, Native American, Chinese, and Japanese residents.[19] The Vancouver Barracks remained an important foundation of the community, but many other civic institutions had been firmly established by 1920, including a library, churches, and schools. Development concentrated west of where Interstate 5 runs today.[20]

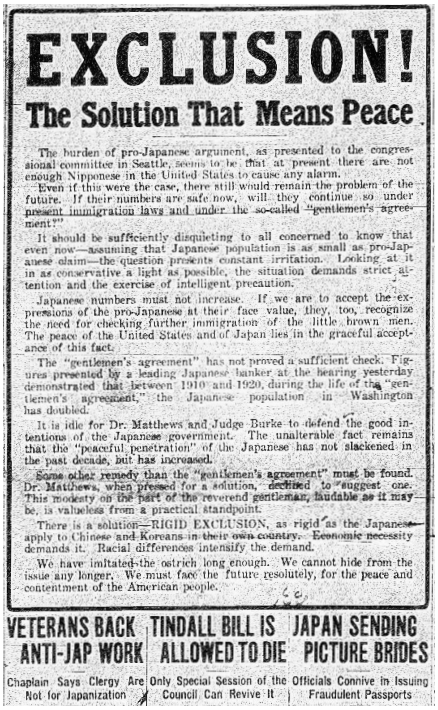
The 1920s saw a resurgence of the Ku Klux Klan across the country. The Klan burst onto the Vancouver scene on March 11, 1921, when three Klansmen in regalia charged into the Clark County Courthouse.[21] The Klansmen provided $45 cash to pay medical expenses for a local child, eliciting sympathy from the local community. In 1924, 500 Klansmen congregated at Vancouver's Bagley Downs for the largest Ku Klux Klan rally in the Northwest, with 10,000 onlookers and a flaming cross.[22] The Klan grew in political and social power in Vancouver throughout the 1920s, presenting itself as a patriotic Christian organization. This influence undoubtedly exacerbated discriminatory attitudes towards minority groups in Vancouver.

Throughout the 1920s, 1930s, and 1940s, restrictive covenants played a major role in urban development across the United States, as communities throughout Washington State adopted deed restrictions to keep out non-white families. These deed restrictions forbid property owners from selling, leasing, or renting to specified groups because of their race, color, or religion. To date, there has been no major study of the use of racial restrictive covenants in Clark County, so it is unknown how prevalent such restrictions were in Vancouver. However, the ongoing Racial Restrictive Covenants Project—involving research teams at the University of Washington and Eastern Washington University—has identified about 40,000 restricted properties in hundreds of neighborhoods within the five Washington counties they have studied to date (Whatcom, Snohomish, King, Pierce, and Thurston).[23] The research teams plan on conducting similar research in Clark County in the years to come.

Vancouver developers *are* known to have placed financial restrictions on plats to prevent the development of lower cost housing. For example, in 1904, the Mountain View addition on Main and 19th Streets advertised that, "No purchaser will be permitted to build a house costing less than $1000" as "no cheap shacks will be permitted to disfigure [the development]."[24]

Japanese-American Families in Vancouver

Japanese immigrants first arrived in the Pacific Northwest in the 1880s. When the Chinese Exclusion Act stopped the flow Chinese immigration in 1882, American industrialists quickly turned to Japan to fill the demand for low-cost labor left behind by the Chinese, particularly in the railroad industry.[25] These Japanese immigrants, however, were subject to discrimination and exclusionary "Alien Land Laws." The 1889 Washington State Constitution prohibited land ownership for aliens (non-citizens). Although the prohibition contained an exception for "those who in good faith have declared their intention to become citizens of the United States," this did not apply to Asian immigrants, who had been banned from obtaining citizenship under any circumstances by US Congress in 1875. After World War I, local nativist activists such as the Hood River Anti-Alien Association pushed one step further, convincing the State to pass the Alien Land Law in 1921, which also took away non-citizens' rights to lease or rent land.[26] This meant that Japanese immigrants could not own *or* lease land in Vancouver. Nonetheless, the Nikkei community (Japanese immigrants and their descendants) persisted in Clark County, playing a large role in Vancouver's truck farms. By 1930, 47% of truck farmers in Clark County were Japanese American.[27] In 1940, Clark County was home to roughly 40 Japanese and Japanese-American residents.[28]



EXCLUSION!

The Solution That Means Peace

The burden of pro-Japanese argument, as presented to the congressional committee in Seattle, seems to be that at present there are not enough Nipponese in the United States to cause any alarm.

Even if this were the case, there still would remain the problem of the future. If their numbers are safe now, will they continue so under present immigration laws and under the so-called "gentlemen's agreement?"

It should be sufficiently disquieting to all concerned to know that even now—assuming that Japanese population is as small as pro-Japanese claim—the question presents constant irritation. Looking at it in as conservative a light as possible, the situation demands strict attention and the exercise of intelligent precaution.

Japanese numbers must not increase. If we are to accept the expressions of the pro-Japanese at their face value, they, too, recognize the need for checking further immigration of the little brown men. The peace of the United States and of Japan lies in the graceful acceptance of this fact.

The "gentlemen's agreement" has not proved a sufficient check. Figures presented by a leading Japanese banker at the hearing yesterday demonstrated that between 1910 and 1920, during the life of the "gentlemen's agreement," the Japanese population in Washington has doubled.

It is idle for Dr. Matthews and Judge Burke to defend the good intentions of the Japanese government. The unalterable fact remains that the "peaceful penetration" of the Japanese has not slackened in the past decade, but has increased.

Some other remedy than the "gentlemen's agreement" must be found. Dr. Matthews, when pressed for a solution, declined to suggest one. This modesty on the part of the reverend gentleman, laudable as it may be, is valueless from a practical standpoint.

There is a solution—RIGID EXCLUSION, as rigid as the Japanese apply to Chinese and Koreans in their own country. Economic necessity demands it. Racial differences intensify the demand.

We have imitated the ostrich long enough. We cannot hide from the issue any longer. We must face the future resolutely, for the peace and contentment of the American people.

VETERANS BACK ANTI-JAP WORK

TINDALL BILL IS ALLOWED TO DIE

JAPAN SENDING PICTURE BRIDES

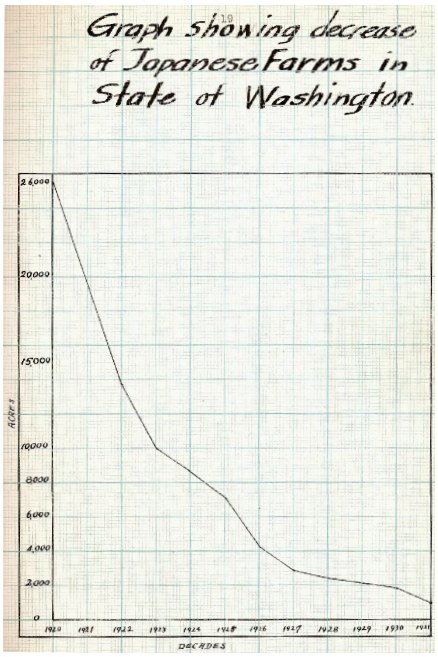
Chaplain Says Clergy Are Not for Japanization

Only Special Session of the Council Can Revive It

Officials Connive in Issuing Fraudulent Passports

1920 editorial in The Seattle Star (The Seattle Star files)

World War II had a devastating impact on Vancouver's small Nikkei community. On February 19, 1942, President Roosevelt issued Executive Order 9066, requiring the removal of 120,000 Japanese and Japanese-Americans from the western coastal areas to inland concentration camps.[29] In March 1942 the *Columbian* reported: "Japanese, German and Italian aliens and American Japanese are forbidden hereafter to live in southern and western Clark county."[30] By the end of the month, Clark County's 19 Japanese-American households has been forcibly removed. After the war, only one of those families returned—and they were required to buy their land back from its caretaker and start over from scratch.[31] Most didn't



Japanese farm ownership in Washington State 1920-31 (University of Washington archives)

try to return to Clark County. For example, Pearl Yoshikawa, a direct descendant of the first Japanese pioneer in Oregon, was born and raised on a Vancouver farm. During the war, she was removed to the Minidoka concentration camp in Idaho. After, she opted to move to New York instead of returning to her former home.[32]

World War II: Explosive Growth and the Vancouver Housing Authority

The arrival of several major industries in the 1940s ushered in a period of unprecedented growth in Vancouver. The Alcoa Aluminum plant opened in 1940, bringing many new jobs and residents to the region. However, the biggest change came with the arrival of the Kaiser Shipyard in 1942. This was one of three massive WWII shipyards in the Pacific Northwest (the other two being across the river in Portland). The 400-acre shipyard assembled and launched its first ship in 165 days. By end of the war, it had produced ten Liberty ships, 30 landing crafts, 50 escort aircraft carriers, 31 attack transports, 12 C4 troopships, eight C4 cargo vessels, and two 14,000 ton drydocks.[33]

The shipyards attracted workers from across the country. Before the attack on Pearl Harbor in December 1941, Vancouver had a population of roughly 18,800 people, the vast majority (92%) of which was white.34 By December 1943, the population was over 83,000.35 During this time, the African American population of Vancouver grew from 18 to 8,825.36 The shipyard needed a great deal of labor to operate, and so conducted targeted recruiting and marketing efforts across the country. This included large recruitment pushes to both white and black workers in the South. The thousands of black workers and families who arrived in Vancouver were just a fraction of the nearly 1.5 million African Americans who left the South in the 1940s, drawn North and West by WWII industries and jobs.37 These families faced a large cultural shift in their move to the Pacific Northwest, trading openly violent and legally mandated segregation for less obvious (but still damaging) racist systems in education, employment, and housing.



Hudson House on the Kaiser shipyard site (Vancouver Housing Authority archives)

The major and rapid influx of population was accompanied by growth in infrastructure and services in Vancouver, including roads, schools, churches, and a great deal of housing. To deal with the major housing demand, the Vancouver Housing Authority (VHA) was founded in 1942. The VHA built six major housing developments over 18 months, including: McLoughlin Heights, Burton Homes, Fourth Plain Village, Fruit Valley, Ogden Meadows, and Bagley Homes.38 Collectively, these developments included nearly 12,400 family units and 10,000 dormitory units spread across 1950 acres of land.39 While a small percentage of these projects were meant to be permanent—and can still be spotted along Grand Boulevard—most were intended as temporary buildings, meant to be demolished after the wartime need subsided.40

The VHA housing projects had no official racial segregation policy. However, many residents and historians have noted that black and white families seemed to live in separate areas within the developments. "On paper there was no race-based housing, but people had experiences that counter that," says Melissa Williams, author of "Those Who Desire Very Much to Stay: African Americans and Housing in Vancouver, Washington, 1940 to 1960."41 Val Joshua, for example, came to Vancouver with her husband from Texas in 1944 and later helped start the local NAACP. She recalls that, when they first arrived in the McLoughlin Heights war housing project, "the whites were on one side of the street and the African-Americans were on the other side."42 Another black resident, Horsea Lewis, recalls trying to move into the Fruit Valley housing development with her young family and being met with threats of arson. She eventually landed in a growing black enclave around 13th Street in Harney Heights, the site of today's Community AME Zion Church.43

Due in large part to this type of housing discrimination, members of the black community formed a local branch of the NAACP (National Association for the Advancement of Colored People). NAACP Branch #1139 began serving Vancouver in 1945, advocating for housing desegregation as well as increased employment and education opportunities for black residents.44 The Vancouver NAACP soon became involved with other groups, such as the Vancouver Civic Unity League, white church leaders, and

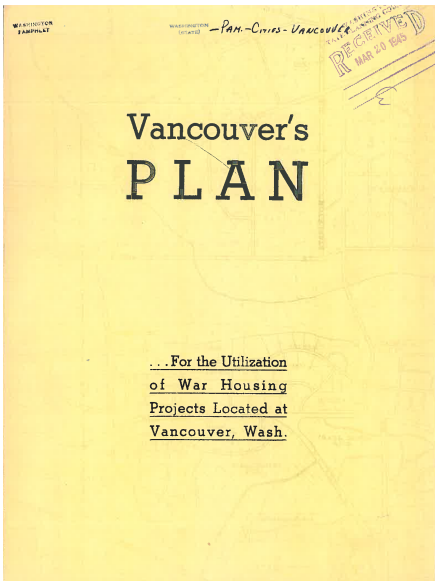


The 1949 meeting of the Washington State Conference of the NAACP was held in Vancouver on April 30. (Clark County Historical Museum, 2007.1.2.32)

the Mayor's office, on the issue of housing segregation. The NAACP also looked towards the future—with WWII drawing to a close, they wanted to ensure that permanent housing would be available to African Americans who wanted to remain in the city.

1945–1958: War's End and the Conversion of Wartime Housing

The end of WWII in 1945 meant a reduction in wartime industries, and the shipyard soon laid off 30,000 workers. This led to discussions about what to do with the VHA's massive wartime housing projects. The vast majority of these had been designed as temporary developments, and there was heavy concern amongst longtime white residents that continued public housing would grow to be a blight on the city.[45] The city opted to demolish the temporary housing and convert the developments into privately owned subdivisions, with the final family moving out of remaining wartime housing in 1958.



Vancouver's Plan for War Housing (Washington Department of Archaeology and Historic Preservation)

The official policy of non-discrimination continued in sales of these properties and (unlike Seattle and Portland) Vancouver did not have a formal red lining policy.[46] The city also created a Mayor's Commission on Open Housing in 1952. This committee, which worked with the local NAACP and boasted a diverse membership, aimed to create non-discriminatory housing for all and handled complaints from across the city.[47] On January 3, 1958, Vancouver also became the first city in Washington to secure special mortgage insurance to finance 150 units of low-cost private housing. [48]

Despite these efforts, unofficial segregation and discrimination continued in the post-war housing market, as families of color were discouraged from renting or buying in many neighborhoods. For example, in 1957 a white woman protested her neighbor's plan to rent one side of her duplex to a black family.[49] In 1958, another white woman circulated a petition trying to force a newly arrived black family in her neighborhood to leave.[50] Even a newspaper report commending Vancouver for its successes in integration confirmed that the arrival of a black family would often lead to "panic selling" in a neighborhood.[51]

In addition to incidents like these, a lack of viable employment opportunities pushed many black families out of the city after the war's end. In 1946, a survey found 77% unemployment among black family heads.[52] "Now that the war is over, you people can go home," is how it felt to Joseph H. Bailey, a Black shipyard worker interviewed

later by *The Columbian*.[53] In response, the local NAACP lobbied major employers in to hire black workers. Although they were met with limited success in Vancouver, their efforts contributed to the passage of the 1949 Washington State Law Against Discrimination in Employment.[54]



Residents fleeing the Vanport flood, May 30, 1948, N Denver Ave, Portland (The Columbian files)

A 1945 VHA survey showed that 57% of black families wanted to stay in Vancouver after the war.[55] Despite this, the African American population declined from 8,825 in 1944 to 879 in 1950 to 494 in 1960.[56] Many black families relocated to the city of Vanport, Oregon, which was destroyed in a catastrophic flood in 1948. Others returned to homes elsewhere in the country or moved to Seattle or Portland to join existing black communities. The NAACP encouraged black families that stayed in Vancouver to settle throughout the city, to prevent the creation of a "black section" that could be targeted for neighborhood violence and intentional disinvestment.[57]

1955–1970s: Arrival of I-5 and Urban Renewal

The arrival of Interstate 5 (I-5) in March 1955 cut off downtown Vancouver and forever altered the fabric of the city. I-5 closed Vancouver's 5th Street—formerly a major arterial and the only road across the military reservation—and made downtown difficult to access due to lack of freeway exits.[58] These changes, combined with the rise of shopping malls, drew many businesses away from Vancouver's city center.

The urban renewal movement of the 1960s and 1970s struck another blow to downtown Vancouver by removing most of the neighborhood's remaining housing. Throughout those decades, metropolitan areas across the country focused on the removal of "blighted" areas in an effort to "clean up" their cities. In practice, this often led to gentrification, as longtime residents—usually communities of color—lost their homes and were priced out of any new developments in the area. This urban renewal movement also threatened historic buildings. For example, the historic Slocum House (built in 1877), was threatened with demolition as part of Vancouver's urban renewal movement. Luckily, community groups rallied to preserve and move it to the southwest corner of Esther Short Park.[59]

By 1970, 99% of Clark County's residents identified as white. Out of a population of 128,500, there were only 548 black, 398 indigenous, 371 Asian Pacific Islander, and 151 Hispanic residents, many of whom lived in an impoverished Vancouver neighborhood near the I-5 bridge spanning the Columbia River.[60]

1980s to present: Growth and Revitalization

The past 50 years have witnessed another period of growth within the city of Vancouver. While this growth is due in part to several major annexations (including the largest in state history), the city has also drawn newcomers with the arrival of many high-tech businesses. In 2020, Vancouver boasted a population of nearly 193,000 residents, making it the fourth largest city in Washington State. 70% of the population identifies as white—a significant decrease from 1970.[61] The VHA still serves residents, providing subsidized housing for families, disabled people, and the elderly. NAACP Branch #1139 also continues to be a vital part of Vancouver's community. The city center has undergone an impressive revitalization, guided by Vancouver's Downtown Association since 1989.[62]

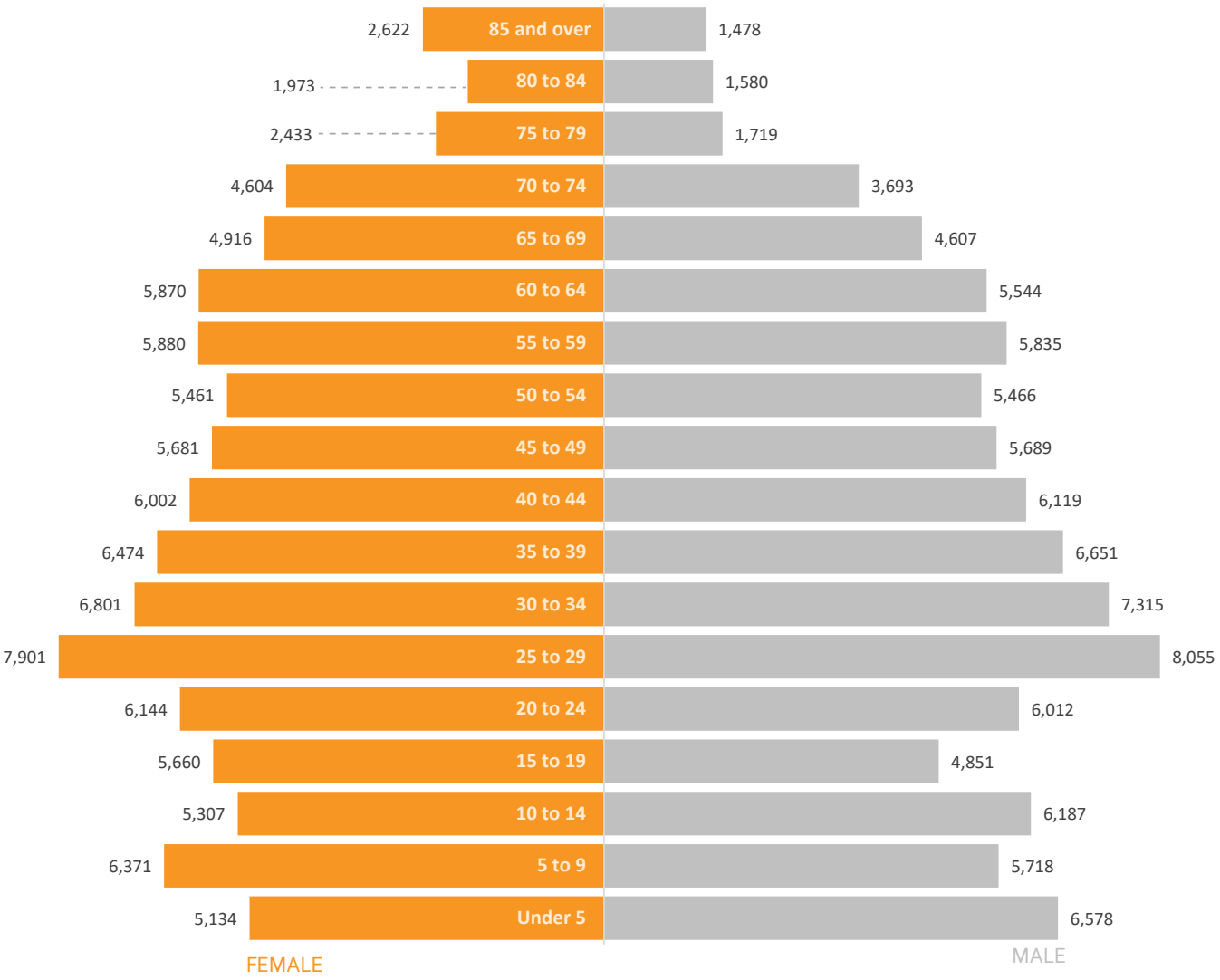
A Current Profile of City of Vancouver Residents

The most recent American Community Survey (2017-2021 5-year estimates) estimate the total population of Vancouver to be 188,331. The population pyramid indicates a relatively high prevalence of young people between 25 and 29 years of age, as well relatively high numbers of young children and adults between 55 and 64 years of age. The rectangular shape is typical for a relatively stable or stationary population, in other words not expected to grow or constrict rapidly through natural means. However, Vancouver is growing due to immigration and urbanization as well as though the annexation program.

Approximately 30,000 adults or 15.7% percent of the population of is aged 65 or older. On the other end of the spectrum, 41,569 residents, or 22.1% of the population, are under 18 years of age.

Vancouver has a stable population with a relatively high number of young people between 25 and 29 years of age.

Exhibit 1 Population by Age and Sex

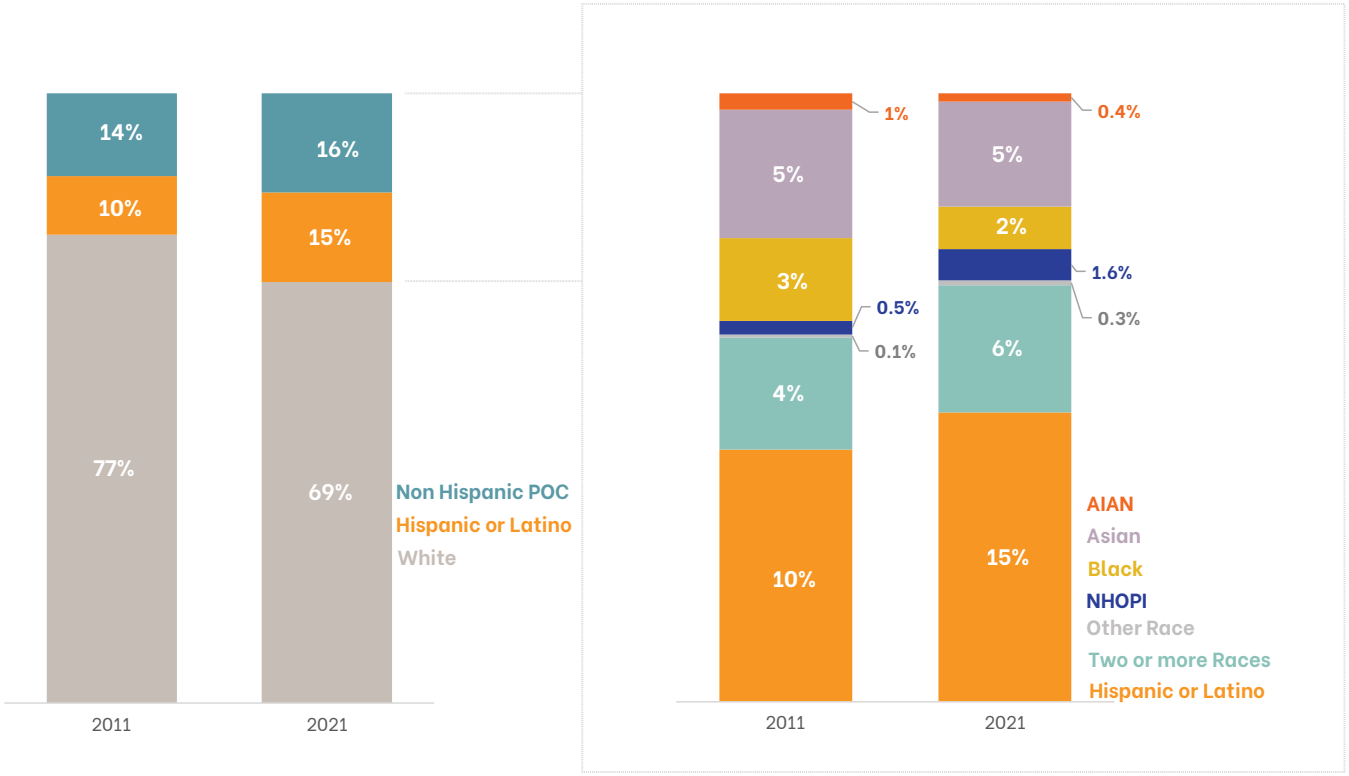


Source: American Community Survey 5-year estimates 2017-2021

Despite being the original inhabitants of the land on which Vancouver sits, the American Indian and Alaska Native population comprises less than one percent of the current population. Native Hawaiian and Pacific Islanders and Black or African Americans each make up about 2% of the total Vancouver population. Individuals identifying as two or more races make up 6%, Asians comprise 5%. Fifteen percent (15%) are Hispanic or Latine (of any race) and 69% of the population of Vancouver identifies as non-Hispanic white alone.

Just over 30 percent of Vancouver's population is POC. Hispanic and Latines of any race are the largest group of POC. However, as shown in Exhibit 2, there are several block groups within Vancouver that are majority POC.

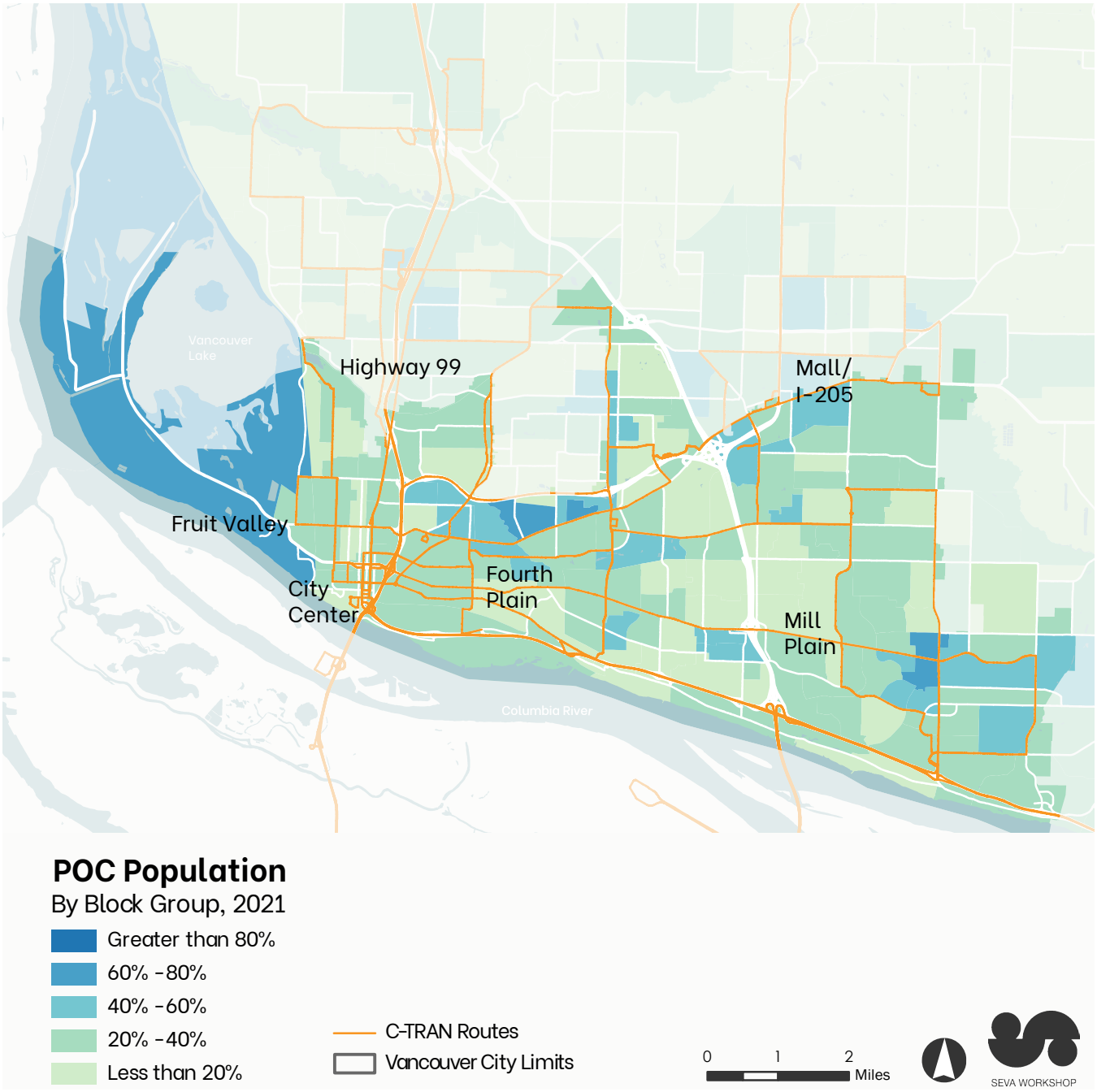
Exhibit 2 Population by Race and Ethnicity: People of Color Detail



Notes: AIAN=American Indian and Alaska Native; NHOPI=Native Hawaiian and Other Pacific Islander. Hispanic or Latine is an ethnicity. The Hispanic or Latine category includes Hispanic and Latine people of all races. All other categories show non-Hispanic races.
Source: American Community Survey 5-year estimates 2017-2021

Areas reaching north along the I-5 and I-205 corridors just outside of the City of Vancouver's boundaries show similar levels of population density and diversity as within. There are distinct concentrations of people of color within certain census tracts in this area.

Exhibit 3 People of color population by block group



Source: American Community Survey 5 year estimates 2017-2021

The City of Vancouver and outlying areas show patterns of location by race and ethnicity.

Exhibit 4 Population density by race and ethnicity and tract



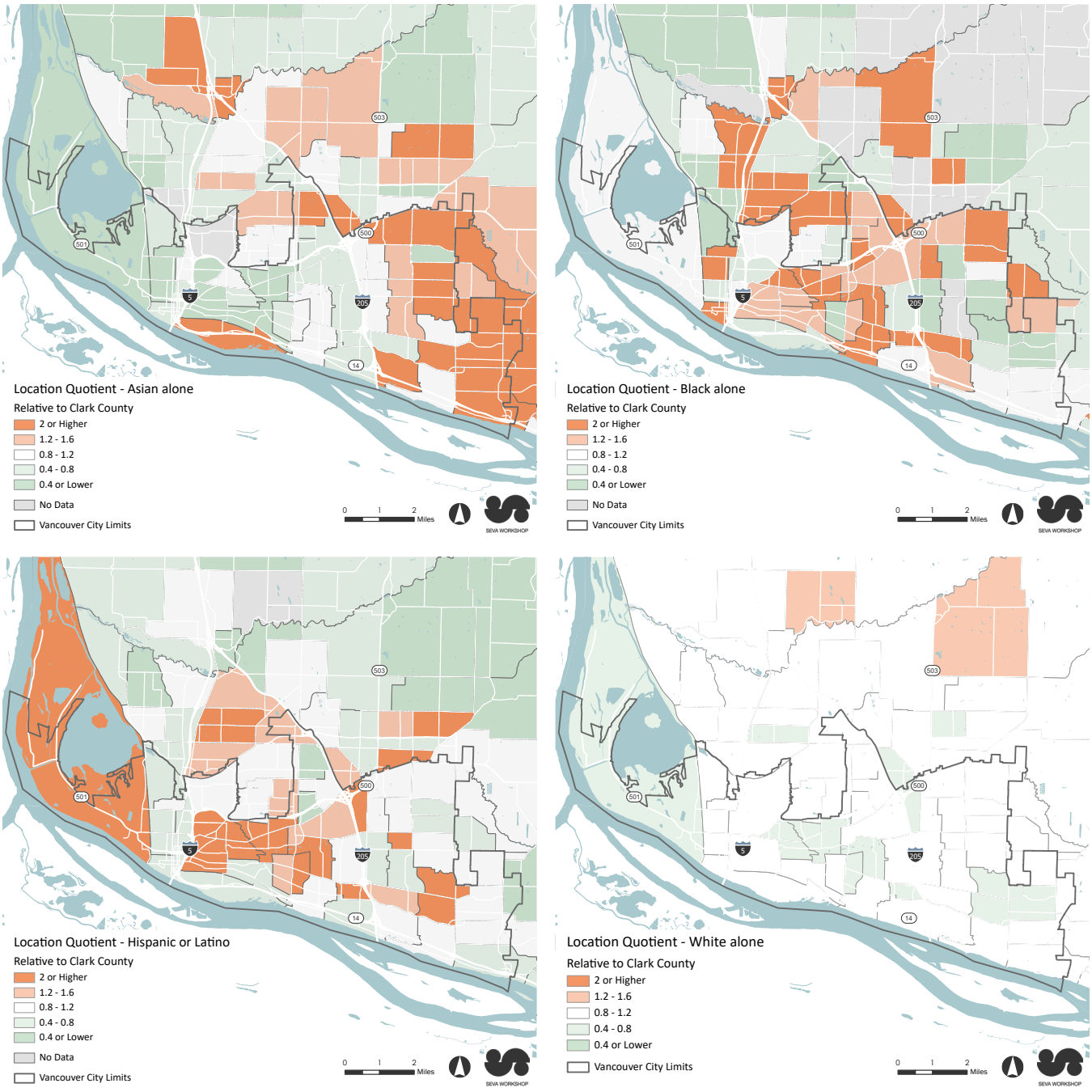
Source: American Community Survey 5-year estimates 2017–2021

A location quotient directly compares the prevalence of a population in a block group to their prevalence in the county overall. A higher quotient indicates a relative concentration of a

group. Patterns in the concentrations of certain populations may reflect de jure or de facto housing discrimination and exclusion, as well as “natural” patterns in housing and location preferences. The Asian population in Vancouver is largely concentrated in eastern block groups bordering with Camas. Black, Hispanic and Latine populations are more likely found in the central and west neighborhoods. The Black population peaked during WWII due to Kaiser shipyard work and was concentrated in neighborhoods nearby. However, the Black population has been declining and dispersing ever since.

Compared to their distribution in the County overall, POC are more likely to live in urban areas.

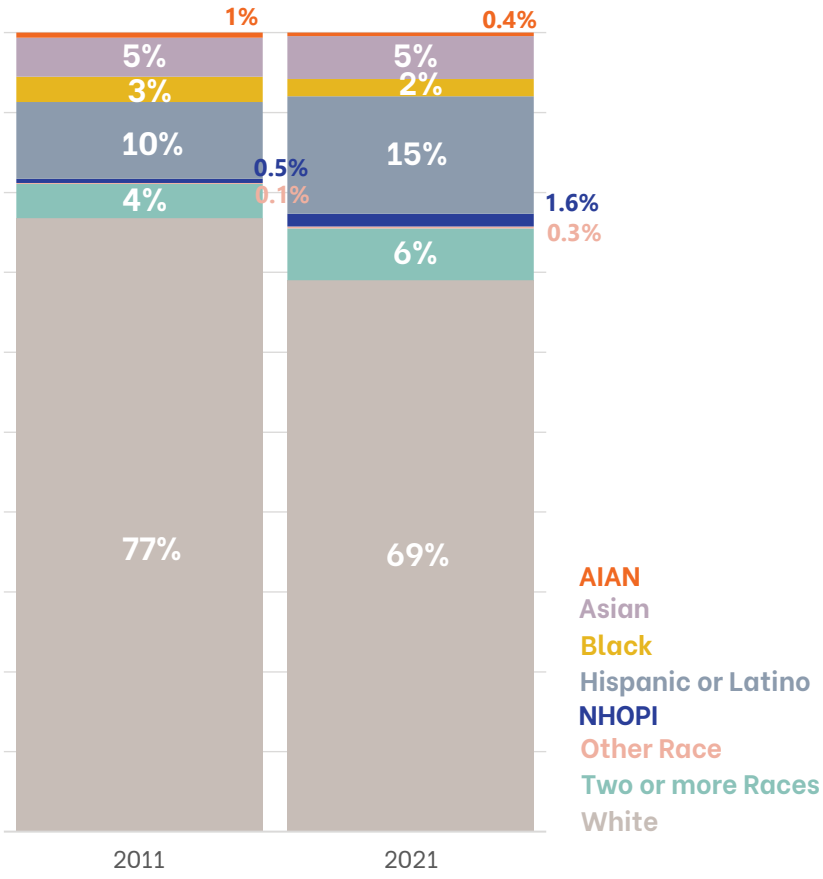
Exhibit 5 Location quotient by tract, Asian, Hispanic or Latine, Black or African American, and White



Source: American Community Survey 5-year estimates 2017-2021

The Vancouver population has grown in diversity over the last 10 years. The Hispanic and Latine, Native Hawaiian and Other Pacific Islander, and multiracial populations are growing as a share of population.

Exhibit 6 Vancouver Population by Race and Ethnicity, 2011 and 2021



Notes: AIAN=American Indian and Alaska Native; NHOPI=Native Hawaiian and Other Pacific Islander. Hispanic or Latine is an ethnicity. The Hispanic or Latine category includes Hispanic and Latine people of all races. All other categories show non-Hispanic races.
Source: American Community Survey 5-year estimates 2017-2021

The American Indian and Alaska Native population, already small by 2010, has declined by almost another third in the last decade. The Black and African American population has also been on the decline in the City of Vancouver (-9%). This trend is a continuation of decades of declining Black population in total numbers and as a share of the population from a pre-WWII peak of over 8,000. Though from a small base, the fastest growing population by race is Native Hawaiian and Other Pacific Islanders (+91%) and the population identifying as two or more races (+120%). The Asian alone population has also been growing at a rate higher than the population overall (27%).

The fastest growing populations of the last decade are Native Hawaiian and Other Pacific Islander although from a very small base.

Exhibit 7 Population by Race, 2010 to 2021

	2011	2021	Percent Change
AIAN	1,006	788	-22%
Asian	7,914	10,079	+27%
Black	5,099	4,076	-20%
Hispanic or Latine	15,544	27,744	+78%
NHOPI	852	2,988	+251%
Other race	179	471	+163%
Two or more races	6,894	12,189	+77%
White	124,118	129,996	+5%
Total	**161,606**	**188,331**	**+17%**

Notes: AIAN=American Indian and Alaska Native; NHOPI=Native Hawaiian and Other Pacific Islander. Hispanic or Latine is an ethnicity. The Hispanic or Latine category includes Hispanic and Latine people of all races. All other categories show non-Hispanic races.
Source: US Decennial Census 2010; American Community Survey 5-year estimates 2017-2021

The Hispanic or Latine category is an ethnic identity drawn from shared culture and history that intersects with race. The population identifying as Hispanic or Latine of any race has increased by 78% between 2011 and 2021, significantly more than the overall population growth of 17%.

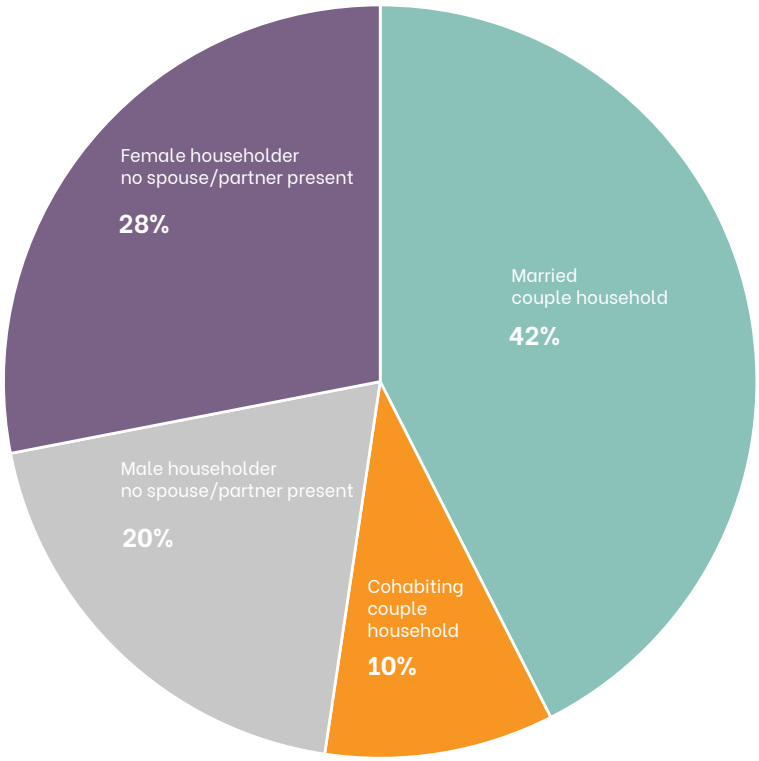
The US Census Bureau first started asking about sexual orientation and gender identity in 2021 with the Household Pulse Survey, a probability survey with a much smaller sample size, and only available at the state level. However, these are the best available data on the size of the LGBTQ+ population in Washington State. Data from the March 2023 pulse shows that an estimated 3.5% of identify as lesbian or gay and 5.5% as bisexual. Another 4.6% responded with a sexual orientation of either "I don't know" or "something else." Two percent (2.1%) of Washingtonians are estimated to be transgender and another 1.5% as something other than cisgender or transgender.

Household Composition

Just over half of the estimated 75,663 households in Vancouver are comprised of couples, either married or cohabiting. Twenty-eight percent of households are female-headed without a spouse or partner and another 20% are male-headed without a spouse or partner. Most single-headed households are persons living alone, without children under 18 or household members over 65-years old. Compared to the State of Washington overall, Vancouver residents are less likely to be in married couple households, and more likely to be single female householders with no spouse or partner.

Nearly half (48%) of Vancouver households are single-headed.

Exhibit 8 Household Composition



Source: American Community Survey 5-year estimates 2017-2021

Compared to Washington State, Vancouver has fewer married couple households, and more single-female headed households.

Exhibit 9 Household Composition Comparison

	City of Vancouver		Washington State		Difference in Percent Share of Households
Married-couple household	32,172	43%	1,467,589	50%	-7.6%
with children of householder(s) under 18 years	13,017	17%	584,510	20%	-2.7%
Cohabiting couple household	7,442	10%	241,242	8%	1.6%
with children of householder(s) under 18 years	2,299	3%	73,286	3%	0.5%
Male householder, no spouse/partner present	14,823	20%	530,227	18%	1.5%
with children of the householder under 18 years	1,237	2%	37,057	1%	0.3%
Householder living alone	9,982	13%	369,143	13%	0.6%
65-years and over	3,364	4%	102,638	4%	0.9%
Female householder, no spouse/partner present	21,226	28%	692,783	24%	4.5%
with children of the householder under 18 years	3,642	5%	114,897	4%	0.9%
Householder living alone	12,624	17%	411,623	14%	2.7%
65-years and over	6,569	9%	197,530	7%	2.0%

Source: American Community Survey 5-year estimates 2017-2021

US Census Bureau data products provide a very limited understanding of the LGBTQ+ population. The measurement "unmarried same-sex couples" was the only identifier consistently available since the 1990's until 2018. Same sex marriage has been legal in Washington State in 2012 likely creating significant miscounts of even this basic measure. The 2018 data, the most recent year for which estimates are available for the City of Vancouver, indicate only 230 same-sex households (0.3% of all households) in Vancouver (90 male-male and 140 female-female). However, more recent and robust data at the state level indicate that the share of households that are of same sex couples, married or unmarried, is likely closer to 1.1%.

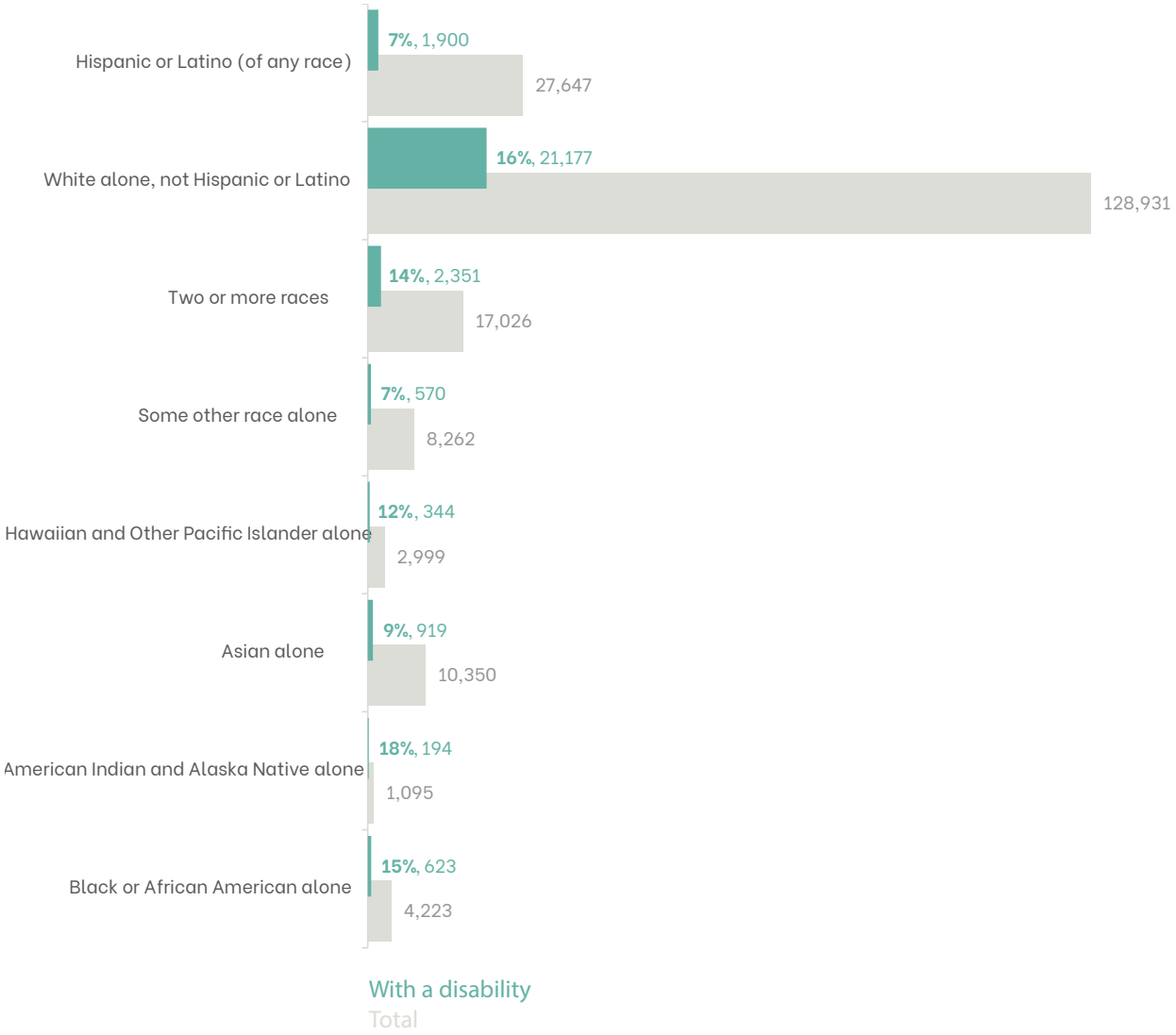
Age and Disability

Twenty-nine percent (29%) of households have at least one person 18 years of age or younger. Twenty-nine percent of households (29%) also have one or more people over the age of 65-years.

27,055 people or about 15% of the population in Vancouver are living with a disability. Cognitive, ambulatory, and independent living difficulties are the most common types of disability.

Vancouver residents of all ages and races experience disabilities.

Exhibit 10 Percent of Population Living with a Disability by Age Group



Source: American Community Survey 5-year estimates 2017-2021
Note: The US Census Bureau measures the prevalence of disability for the civilian population living outside of institutions.

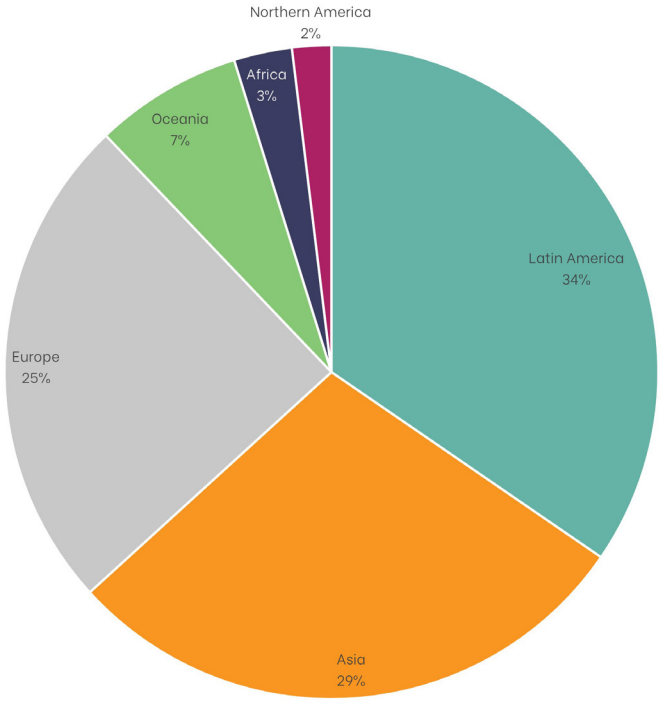
The Asian population (9%), those identifying as some other race alone (7%), and those identifying as Hispanic or Latine of any race (7%) report incidence of disability at lower rates than the population overall. American Indian and Alaskan Natives report the highest prevalence of disability (18%).

Place of Birth and Language

In 2021, 13.7% of the Vancouver population (25,773 people) was foreign-born. Over one-third of the foreign born population originates from Latin America, and another 29% from Asia, and 25% from Europe. Compared to the place of birth distribution of the foreign-born population in Washington State overall, Vancouver is much more likely to be home to immigrants and refugees from Europe and Oceania. In fact, according to data from the Migration Policy Institute, Clark County, Washington has the third largest Micronesian immigrant population of all counties in the United States, behind two counties in Hawaii.

Compared to Washington overall, Vancouver's foreign-born population is more likely to originate from Europe and Oceania.

Exhibit 11 Foreign-born Population by Place of Birth



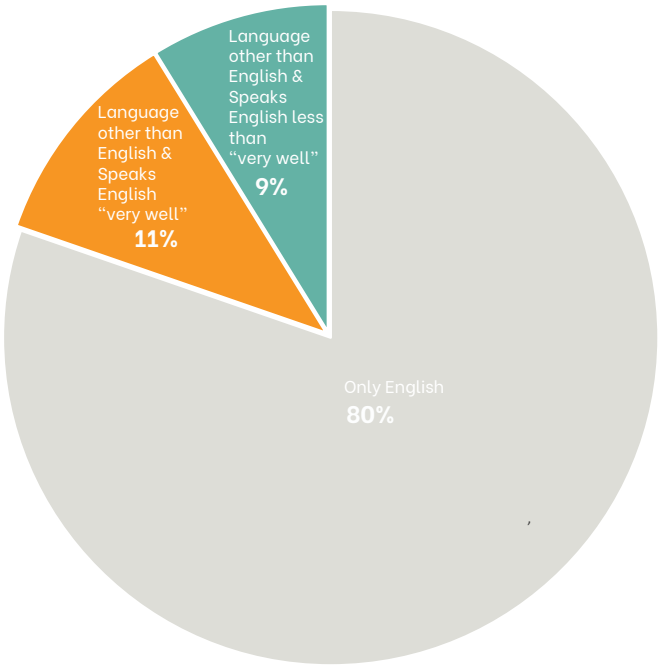
Source: American Community Survey 5-year estimates 2017-2021

The foreign-born population in Vancouver is distributed relatively evenly in terms of time of entry to the United States, though it does skew slightly toward newer arrivals as compared to Washington State overall. About one-quarter of the foreign-born population arrived in 2010 or later. Another 28% arrived between 2000 and 2009. The remaining 45% have been in the United States for over twenty years (entered 1999 or earlier). Ongoing climate change impacts in the Pacific Islands, and political and economic instability in the Russian/Ukranian and Afghan regions is likely to drive further migration towards places like Vancouver where there is an established population and services

Twenty percent (20%) of the Vancouver population age 5 and older speaks a language other than English at home, roughly equivalent to the prevailing rate in Washington State. More than half of the residents who speak a language other than English at home, also speak English very well (11% of the population over 5). The remaining 9% speak English less than very well. Compared to the State of Washington overall, Vancouver residents who speak another language are slightly less likely to have English ability.

Nine percent of the population speaks English less than "very well."

Exhibit 12 Language Spoken at Home for Population Age 5 and older



Source: American Community Survey 5-year estimates 2017-2021

A “limited English speaking household” is one in which no member 14 years old and over speaks English at least “very well.” In previous US Census products these households were referred to as “linguistically isolated.” In Vancouver, speakers of Russian, Polish, or other Slavic languages make up the largest number of households with limited English ability, estimated at 1,196 households. Spanish speaking households add another 1,071 households with limited English ability. Smaller groups with limited English households include Other Indo-European languages with 413, Chinese (including Mandarin and Cantonese) with 374, Vietnamese with 65, Tagalog with 93 and other Asian and Pacific Island languages with 267 households. These are likely to include Chuukese speaking communities from Micronesia. Note that the category of “Indo-European languages” contains all languages of the Indian subcontinent as well as Greek, Swedish, and Italian.

Community Outcomes

This section presents data on some key community outcomes. At the June 12, 2023 meeting of the Equity Team, the following community outcomes were identified as Vancouver's top priorities:

1. As Vancouver grows, anyone who wants to can afford to live in the city in safe, stable housing.
2. Public transportation is a viable alternative to owning a personal vehicle and offers connectivity across destinations in Vancouver.
3. Create reparative policies that account for the ongoing harm caused by past racist policies, including those related to land use, housing, and the criminal legal system.

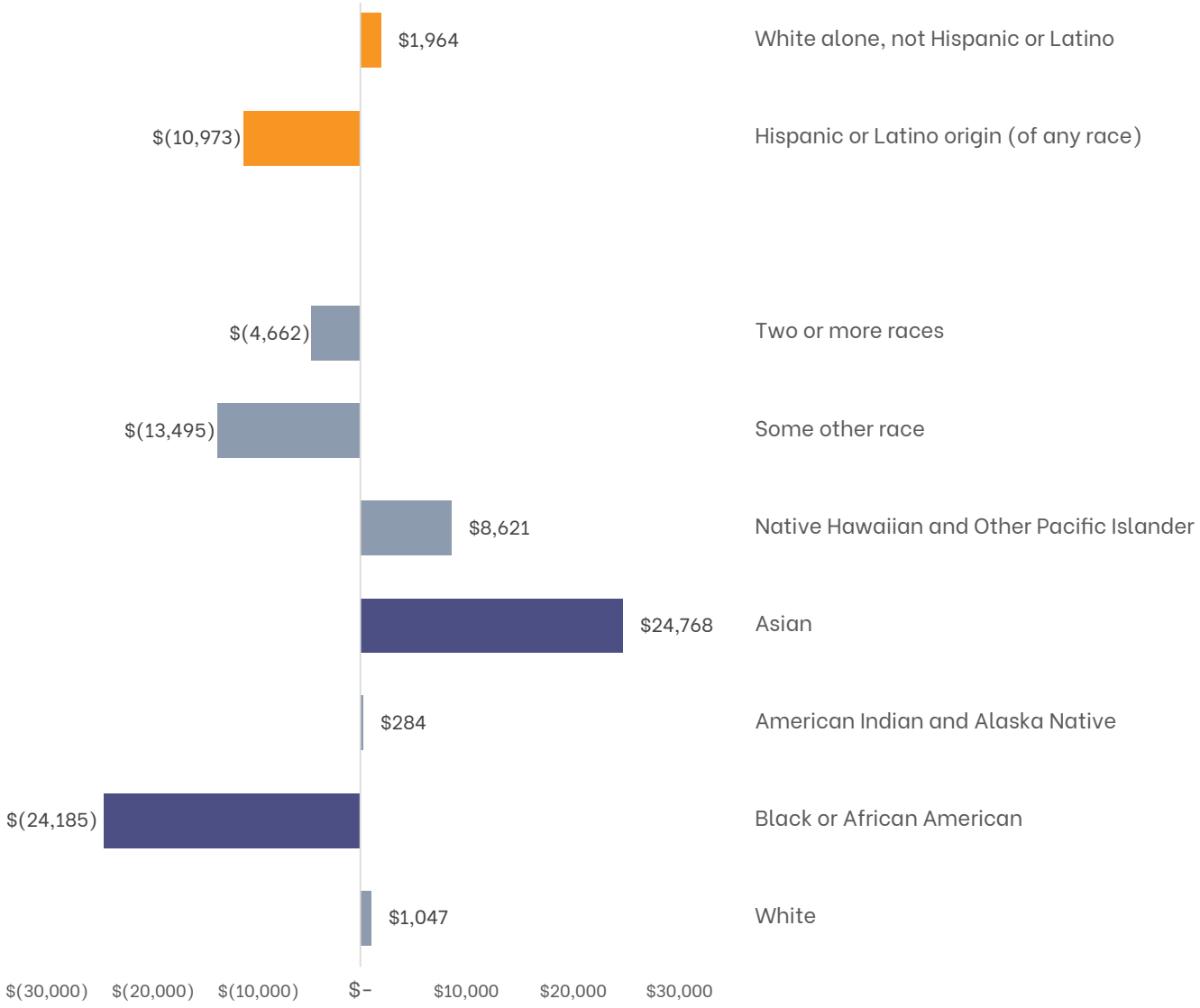
In an equitable society, demographic characteristics would not predict these outcomes. As we can see in the following data however, there are often disparities according to race, ethnicity, and other demographic factors. The following analysis relies on the best available public data, from sources such as the US Census Bureau. However, they still are limited by lags in data collection and processing, bias, and statistical error. Local observation is needed to complement these data and provide a more current and complete understanding of conditions. Where possible, we have included relevant quotes and comments from Equity Team members and community engagement.

Income and Poverty

Income is one half of the equation that determines whether a family can afford to live in the City of Vancouver, the top desired community outcome. The median household income estimated in 2021 for Vancouver was $67,462. The median income varies considerably by race and Hispanic or Latine origin. The median household income where the householder is Black or African American, for example is over $24,000 less than the overall median. On the other hand, households with an Asian head of household have a median income that is over $24,000 more than the overall median.

The median income in Vancouver varies greatly according to race of the householder.

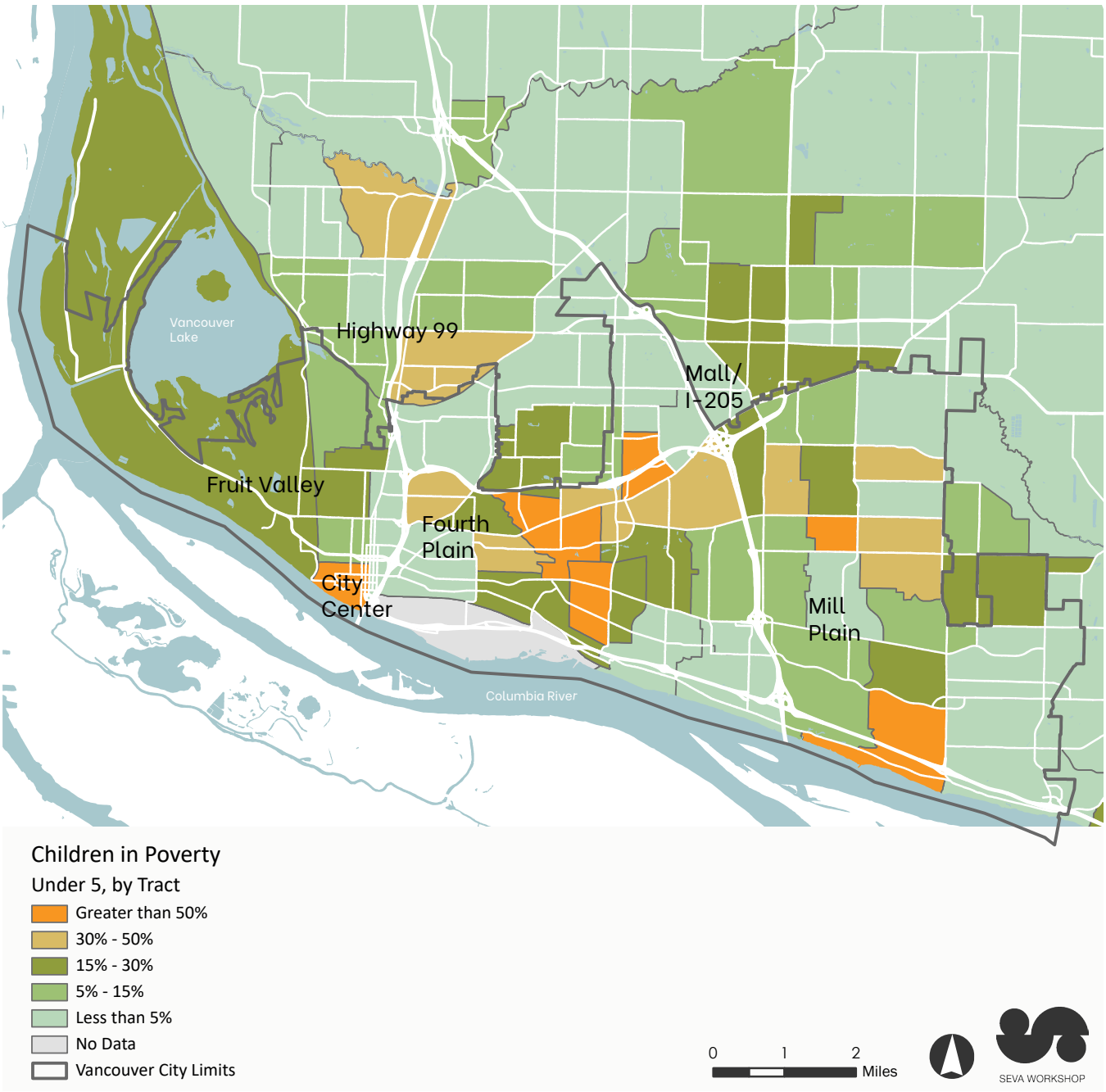
Exhibit 13 Household income, by race and Hispanic/Latine origin of householder compared to overall median.



Source: American Community Survey 5-year estimates 2017-2021
Note: A value of 0 indicates the median value for that group equals the median value for all of Vancouver.

Extreme rates (over 50%) of early childhood poverty are found in a few neighborhoods within city boundaries, including Bagley Downs and Meadow Homes and southeast.

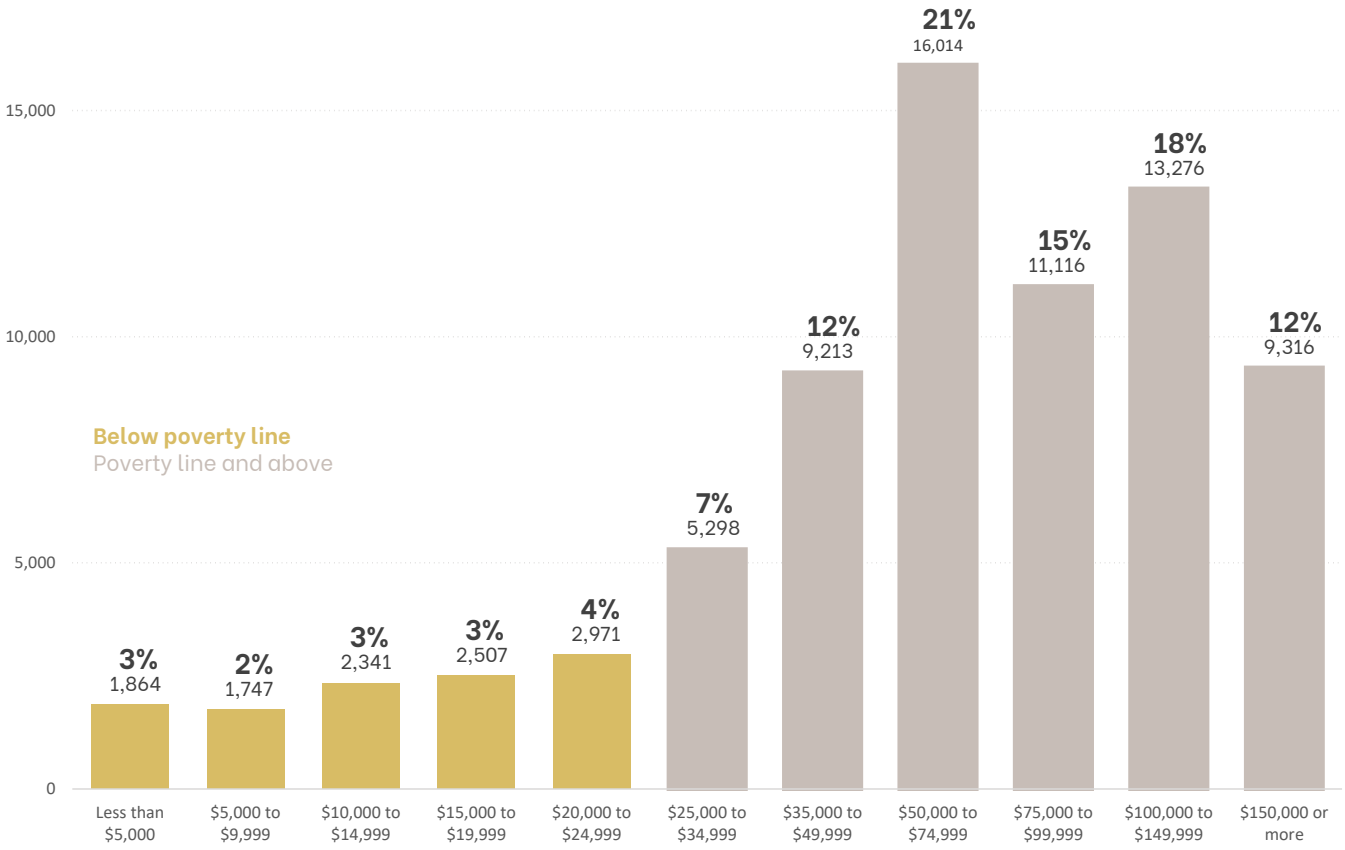
Exhibit 14 Children under 5 in poverty, by tract



Source: American Community Survey 5 year estimates 2017-2021

Over fifteen percent of resident households are living below the federal poverty line.

Exhibit 15 Household income



Source: American Community Survey 5 year estimates 2017-2021

Food Access

Income is also linked with food access. Over 11,000 households in Vancouver are accessing food stamps/SNAP benefits. Roughly half of these households have a member living with a disability. One-third of these households are comprised of a female householder with no spouse present. 46.8% of these households have a child under 18 years of age. Relative to their share of the overall population, households receiving SNAP benefits are disproportionately likely to be Black or African American, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and/or Hispanic or Latine in origin. The majority (over 80%) of these households have at least one worker in the past 12 months.

Across both Evergreen and Vancouver School Districts, 65% of enrolled students are eligible for free lunch through the National School Lunch Program, the federal nutrition program for low-

income students as of October 2022. However, this rate varies greatly among individual school buildings. The school with the lowest eligibility rate was Felida Elementary with 19.1%. Six other schools, with combined enrollment of 2,445 students, are 100% eligible for free lunch. In the Vancouver School District, these are Eleanor Roosevelt Elementary, Fruit Valley Elementary, Martin Luther King Elementary, McLoughlin Middle, and Washington Elementary. In the Evergreen District, Hollingsworth Academy (K-12) is 100% eligible for free meals.

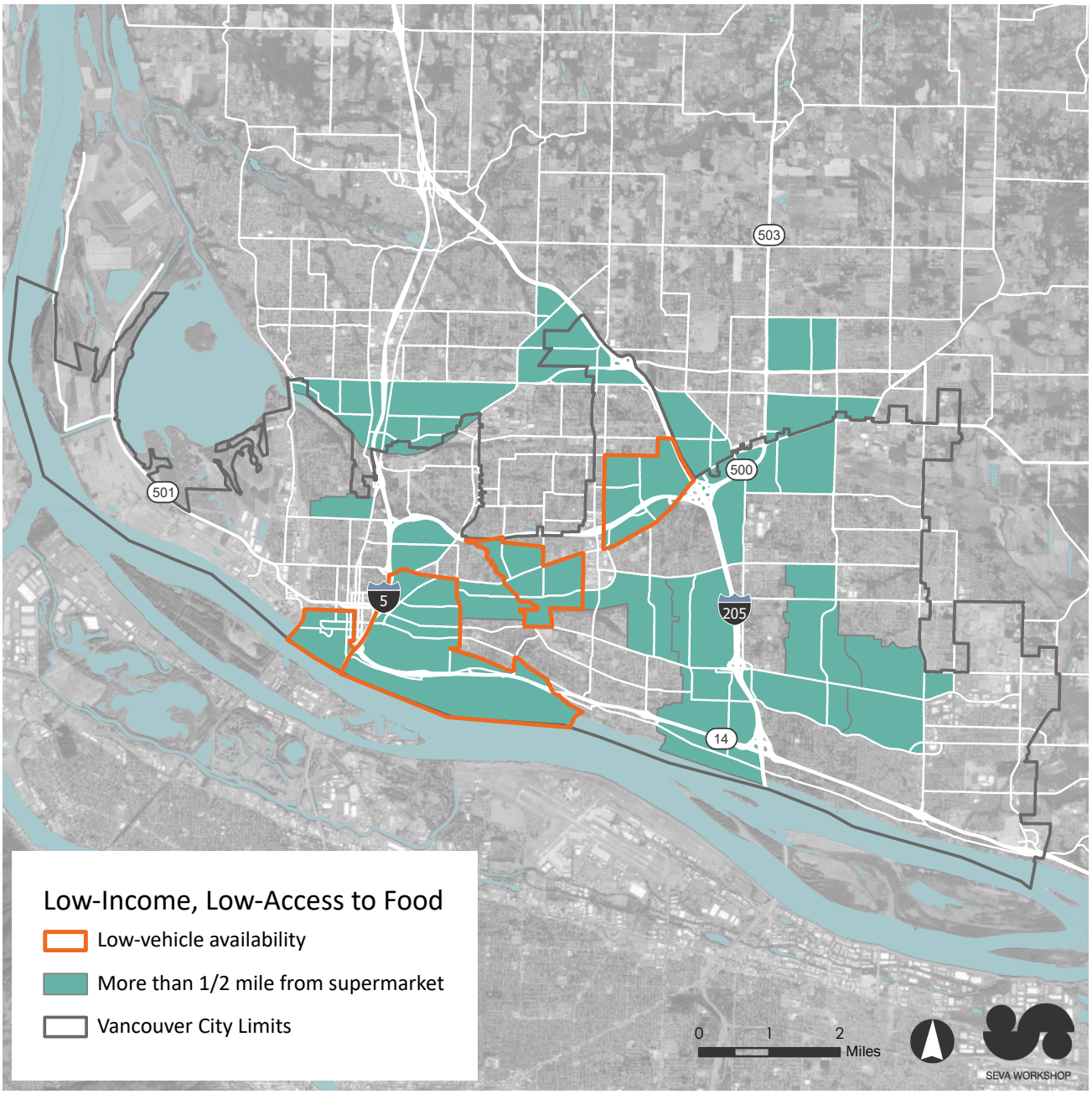
The USDA Economic Research Service uses the term low-income and low-access to designate areas with limited access to healthy food. These areas are sometimes referred to as "food deserts."

> ***"I'm surprised that Fruit Valley is not considered a low-income, low-access to food area. One of the main issues in the area is that residents have to drive about 20 minutes to the closest grocery store, and those without a car have more challenges due to limited public transit service in the area." Equity Team July 18, 2023***

> ***"The Fourth Plain area is a low-income area, but I wouldn't say it's a food desert area. There is a WinCo, a Grocery Outlet, a Walmart, and several ethnic supermarkets in the area." Equity Team July 18, 2023***

City Center and Fourth Plain areas are food deserts according to indicators used by the USDA.

Exhibit 16 Census Tracts Identified as Low-Income, Low-Access to Food



Source: USDA Economic Research Service, Food Access Research Atlas, 2022.

For most families, food is second only to housing in terms of household spending. Families that live in food deserts need to spend more time and resources than other families to access healthy food.

In this way, basic food and nutrition is more costly for low-income residents. (It is expensive to be poor.)

For urban areas, a census tract with a high proportion of low-income residents who are one half mile or more from a grocery store (excluding convenience stores and mini-marts) would be considered low-income, low-access (shown in orange outline). These are importantly the types of stores where the majority of SNAP benefits are used. However, many more tracts (shaded in blue) have a high proportion of residents living more than one-half mile from a grocery store. The especially impacts households with no vehicle access (7.3% of households in Vancouver). Tracts in Vancouver with higher proportions of POC are more likely to meet these food desert criteria.

Housing and Mobility

The availability of affordable housing is the other key component to achieving the top desired community outcome. The current conditions, however demonstrate a market where communities are threatened by displacement and housing is growing farther out of reach for middle and low-income families. First-time homebuyers and even first time renters are encountering more challenges finding housing opportunities in Vancouver than previous generations.

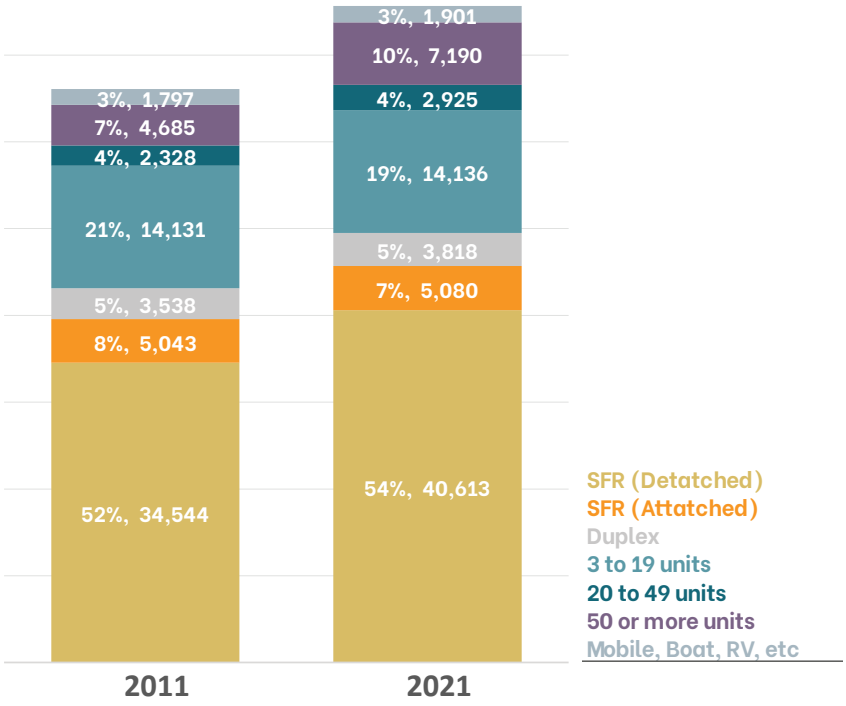
> ***"A lot of younger adults who just graduate high schools students. A lot of people have expressed their difficulty finding the first apartment. Often they have to find a partnership or stay on in one just because of housing." Equity Team July 18, 2023***

> ***"There are a lot of ways in which housing is difficult. I have lived in Lincoln for a long time. I couldn't buy the house I live in. I bought it for 130 K and now it is 650K." Equity Team July 18, 2023***

Vancouver's housing stock increased by 15% between 2011 and 2021, slightly lagging population growth of about 17% over the same period. The mix of housing types remained similar over the years, though there has been some shift within multifamily from smaller (3 to 19 units) towards larger developments of 50 or more units.

Housing stock increased by 15% between 2011 and 2021, slightly lagging population growth of about 17% over the same period.

Exhibit 17 Housing units by type, 2011 to 2021

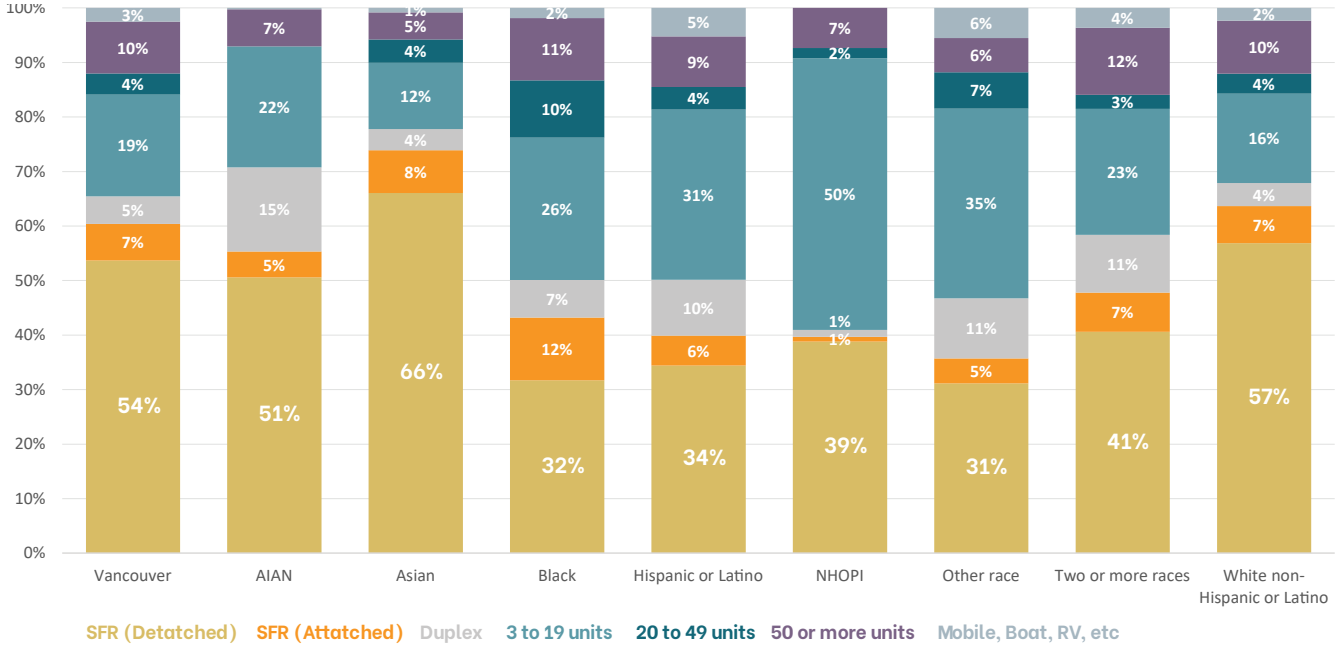


Source: American Community Survey 5 year estimates 2007-2011 and 2017-2021

The occupants of housing by type varies by race. These race-based distinctions also likely reflect intersecting patterns in income, home ownership, and neighborhood-level differences in housing mix. Asian residents are disproportionately likely to live in detached single family housing. Black, Hispanic and Latine, and Native Hawaiian and Other Pacific Islander, and those of other or two or more races are more likely to live in multifamily. These patterns have been relatively stable since 2011.

Asian residents are disproportionately likely to live in detached single family housing. Black, Hispanic and Latine, and Native Hawaiian and Other Pacific Islander, and those of other or two or more races are more likely to live in multifamily.

Exhibit 18 Housing units by race, 2011 to 2021



Source: American Community Survey 5-year estimates 2017-2021

The limited definitions of single family and multifamily obscure important nuance in preferences for housing. Priority groups such as people living with disabilities, Native Americans, Pasifika, Black and Latine households may prefer units that are appropriate for multi-generational living or housing that can accommodate extended family members and/or caregivers. These types of units may be found in SFR or multifamily, and data is lacking on the true current stock of multi-generational appropriate housing.

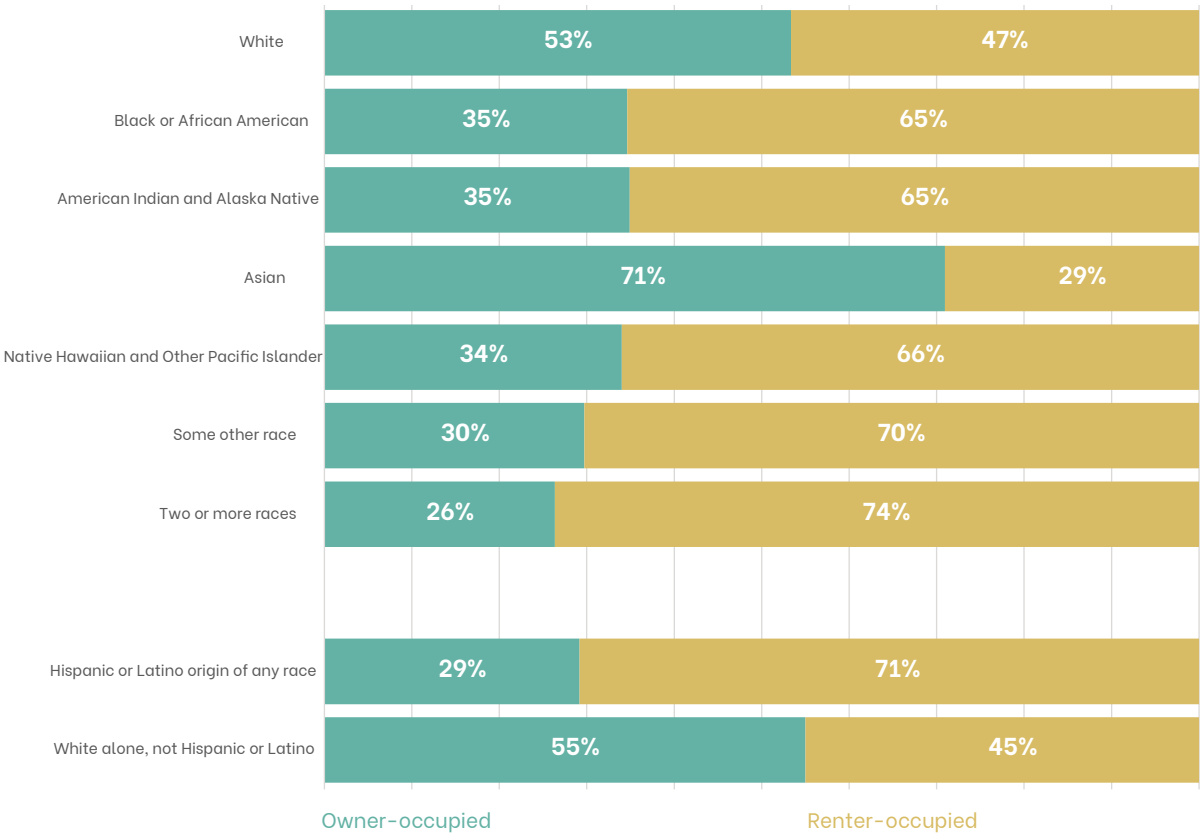
> ***"Revisiting building codes is an important thing to consider. For example. if you are part of the Chuukese community you might need some intergenerational housing. Many get constantly evicted. How do we account for these cultural differences?" Equity Team July 18, 2023***

> ***"A lot of black communities and Latine often have family members come to live with them. It is because of housing challenges or sometimes people with disabilities want to live with others for support. Housing types should accommodate this." Equity Team July 18, 2023***

Housing ownership is historically an important means to wealth-creation. Of the estimated 75,663 households in Vancouver, about 51% reside in owner-occupied housing and 49% in renter-occupied housing. As a point of comparison, the owner-occupied housing rate across the State of Washington is approximately 64%. The predominance of the rental market in Vancouver in part reflects the relatively large number of young single-person households. Racial patterns in occupancy status largely reflect state-wide patterns with Asian and white households accessing housing ownership opportunities at much higher rates than other groups. However, these rates can vary greatly within white and Asian depending on country of origin, ethnicity, and time in the country. About 29% of Hispanic and Latine households of any race live in owner-occupied housing. These disparities are in part due to years of discrimination across sectors, such as education, labor markets, and housing, that has limited the earning power of households of color.

Asian residents are the most likely to live in owner-occupied housing, roughly twice as likely as other POC groups.

Exhibit 19 Owner-occupied and renter-occupied housing by race



Source: American Community Survey 5-year estimates 2017-2021

The average Vancouver home value is $474,617. Under the assumptions of a 20% down payment, 6.6% interest rate, and 30 year fixed mortgage, a household would have to earn over $110,000 annually to afford the average Vancouver home. The median household income estimated in 2021 for Vancouver was $67,462. The median gross rent reported in the 2021 ACS was $1,396, considered affordable to households earning $55,840 or more. Still, relative to Portland and other urban areas in Washington State, Vancouver housing is more affordable.

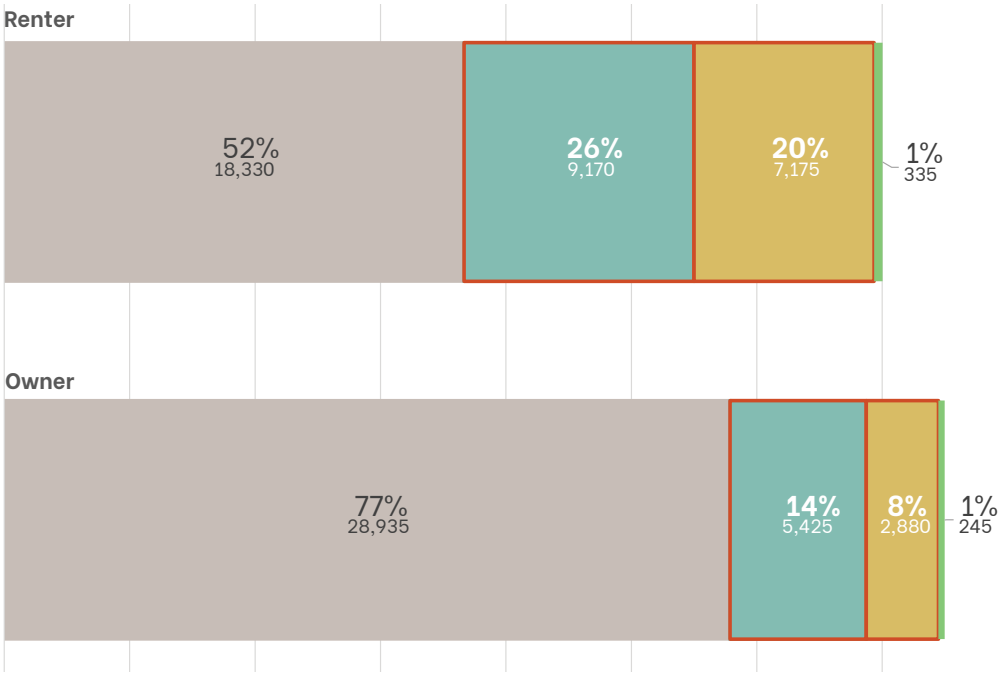
The number of households that are "cost-burdened" or spending an out-sized proportion of their monthly income on housing is an indicator of housing needs. HUD defines a household as cost burdened if they pay between 30% and 50% of their gross household income for housing, and severely cost burdened if

they pay more than 50% of their gross household income on housing. Overall, in Vancouver, 34% of households are considered rent burdened at the 30% threshold. Fourteen percent (14%) are burdened at the 50% threshold, or severely cost-burdened. These households are at a greater risk for displacement.

Renting households are more likely to be housing cost burdened than owner households. Forty-six percent (46%) of renter households pay more than 30% of household income on housing. Of those a large portion are paying more than 50% of income on housing. Initial deposit requirements can be a barrier for renters looking to access housing for the first time or moving between rentals. Equity team members have also reported that short-term rentals may be constructing the supply of available affordable long-term rentals.

Nearly half (46%) of Vancouver's renting households are cost burdened, and 20% severely so.

Exhibit 20 Owner-occupied and renter-occupied housing cost burden



Source: CHAS (Comprehensive Housing Affordability Strategy) dataset based on the American Community Survey 5-year estimates 2015-2019

The likelihood of experiencing severe housing cost burden is much higher for low-income households. Sixty-seven (67%) of households earning 30% of the area median income or less are paying more than half their income for housing.

Over two-thirds of the lowest income households are paying more than half their income for housing.

Exhibit 21 Housing cost burden by income

	Cost burden >30%	Cost burden >50%
Household Income <= 30% HAMFI	79%	67%
Household Income >30% to <=50% HAMFI	72%	25%
Household Income >50% to <=80% HAMFI	42%	3%
Household Income >80% to <=100% HAMFI	14%	2%
Household Income >100% HAMFI	4%	0%
Total	**34%**	**14%**

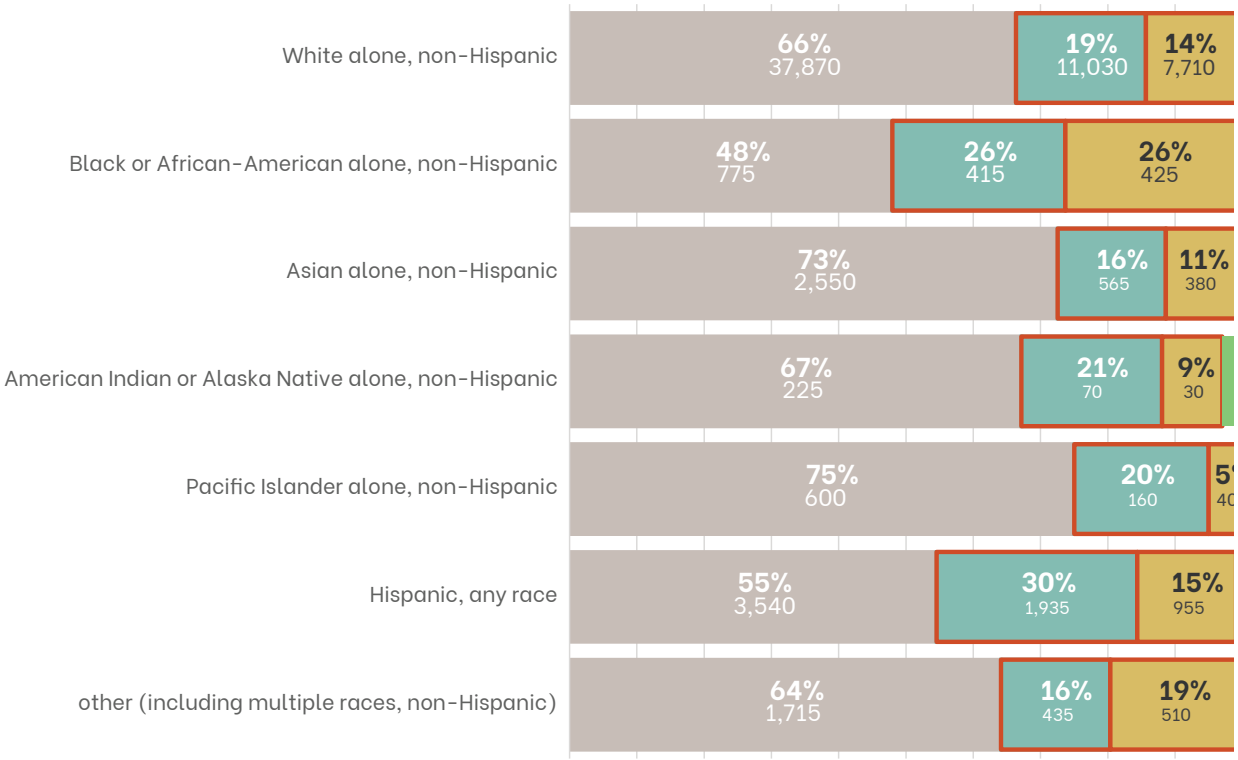
Source: CHAS (Comprehensive Housing Affordability Strategy) dataset based on the American Community Survey 5-year estimates 2015-2019

The experience of living under a high housing cost burden also displays patterns according to race and ethnicity. Fifty-two percent of Black and African Americans in Vancouver are paying more than 30% of their income for housing costs. Forty-five percent of Hispanic residents of any race are also cost-burdened at the 30% threshold. Non-Hispanic Asians and non-Hispanic Pacific Islanders are among the groups least likely to be cost burdened.

Black and Hispanic/Latine headed households are the most likely to be experiencing housing cost burden and therefore displacement risk. Exhibit 7 Population by Race, 2010 to 2021 on page 23 shows that the Black population has been on the decline. However, as the quote below and Exhibit 5 suggest, the Black population may be moving to areas just outside City limits that are annexation possibilities.

> ***"The decline of the Black population may be attributed to people moving to more affordable housing outside city limits. Areas currently being considered for annexation include higher than average BIPOC populations. The data reveal the number of Black residents is declining, but experience suggests otherwise." Equity Team July 18, 2023***

Exhibit 22 Housing cost burden by race

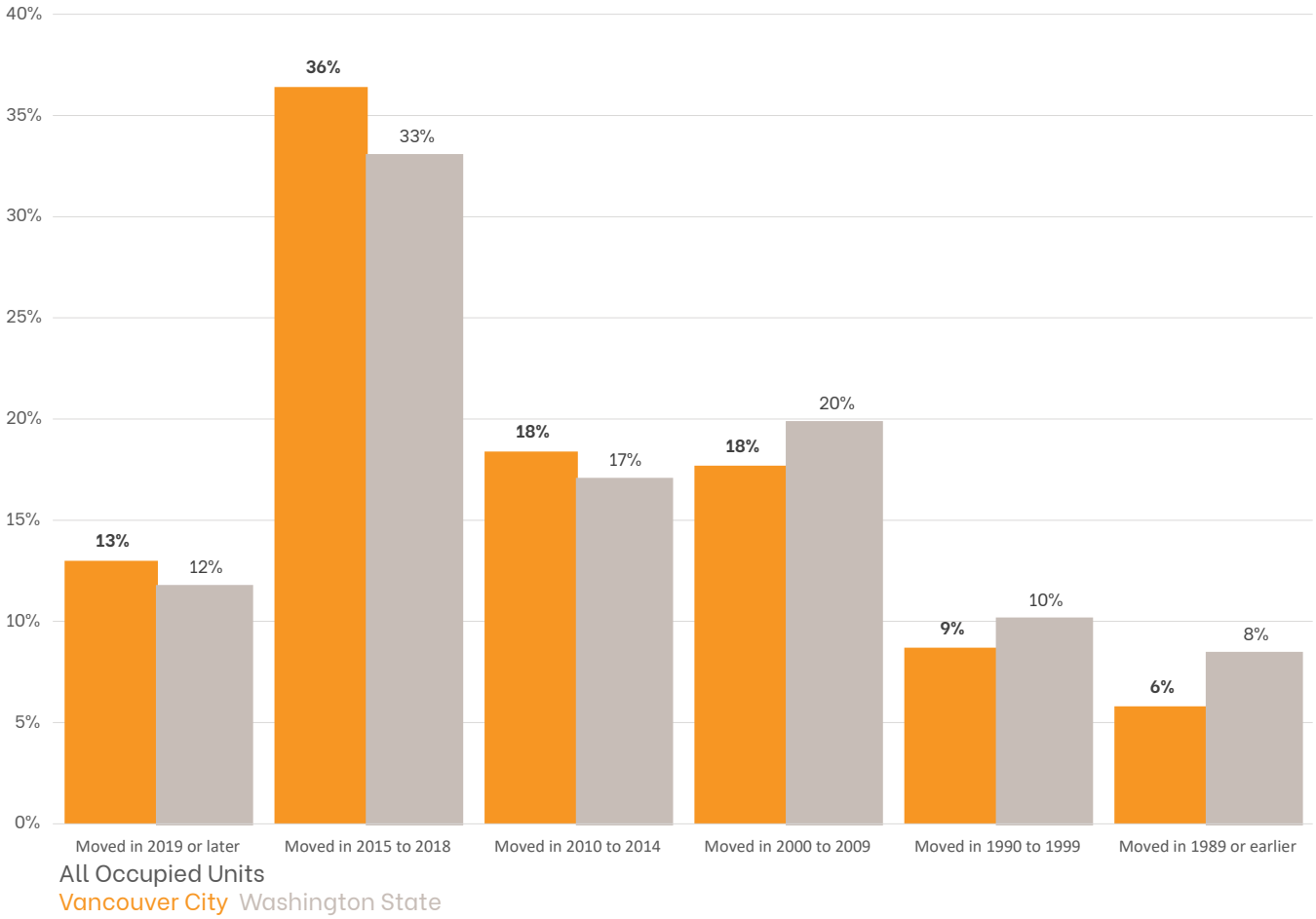


Source: CHAS (Comprehensive Housing Affordability Strategy) dataset based on the American Community Survey 5-year estimates 2015-2019

Compared to Washington State overall, Vancouver residents tend to be more recently moved into their current residence, whether owner- or renter-occupied. The years 2015 to 2018 in particular saw a relatively high number of move-ins to Vancouver, much of it owner-occupied. This three year period alone accounts for over one-quarter of owner-occupied housing in Vancouver.

Compared to the State, Vancouver residents are slightly more likely to have moved recently.

Exhibit 23 Year householder moved into current residence, Vancouver and Washington State (all tenure types)

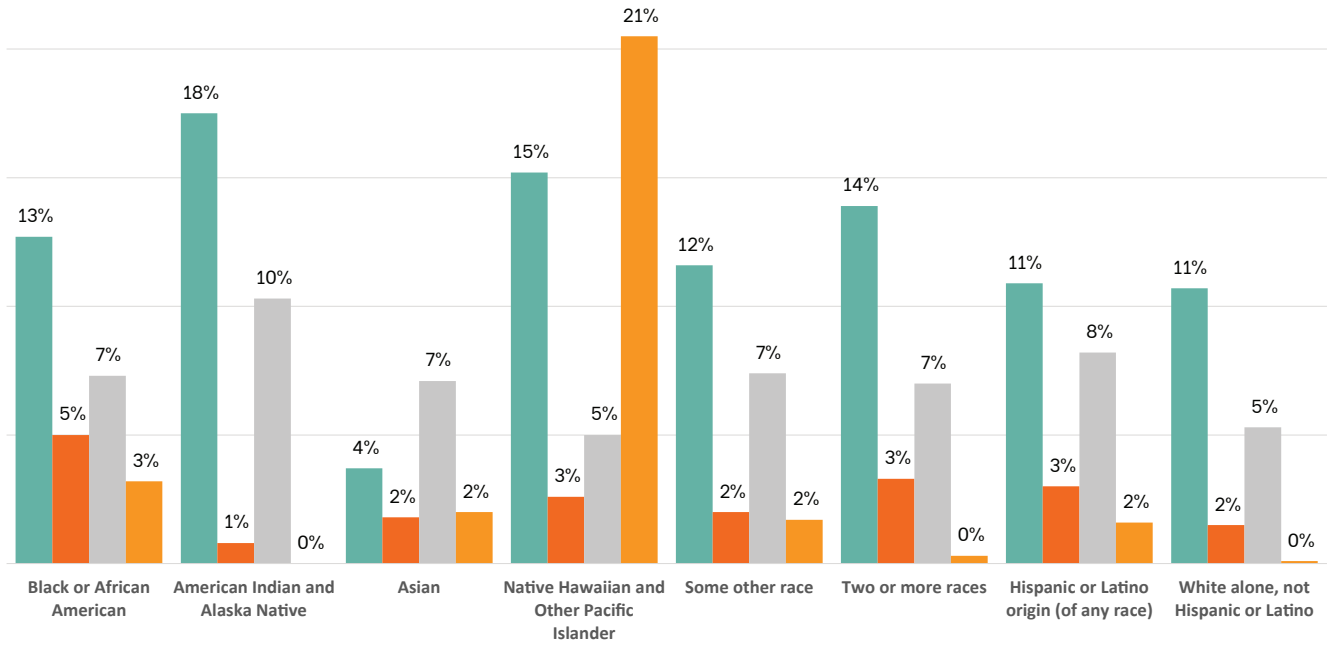


Source: American Community Survey 5-year estimates 2017-2021

Asian and White residents are the most likely to reside in the same place in Vancouver they did in the past year. Other racial groups have higher geographic mobility, through the place of origin varies. For example, American Indian and Alaska Native residents are the most likely to have moved from another place in the same county and the most likely to have moved from another state. Twenty-one percent of Native Hawaiian or Pacific Islander residents have moved from abroad in the past year.

Native Hawaiian and Other Pacific Islanders in Vancouver are one of the fastest growing populations and likely to have moved from abroad.

Exhibit 24 Geographic Mobility, residence one year ago by race



Source: American Community Survey 5-year estimates 2017-2021

Employment and Transportation to Work

Of the population of Vancouver aged 16 and older, 65% are in the labor force, and 61% are employed. The city had an estimated unemployment rate of 5.5% in 2021, roughly the same as statewide figures. People identifying as Native American and Alaska Native (8.5%); of two or more races (8.3%); and Black or African American (8.0%), experience higher rates of unemployment. Women with children under 6 years old only (9.6%) and children under 6 and children between 6 and 17 years (21.4%) also experience higher rates of unemployment. It is important to note that the data source covers a five-year span 2017-2021 which contains the employment impacts of the COVID-19 pandemic which disproportionately affected women workers and workers of color. Emerging data and evidence also indicate that recovery and access to jobs in the post-pandemic workplace has been biased against Black and Indigenous workers.

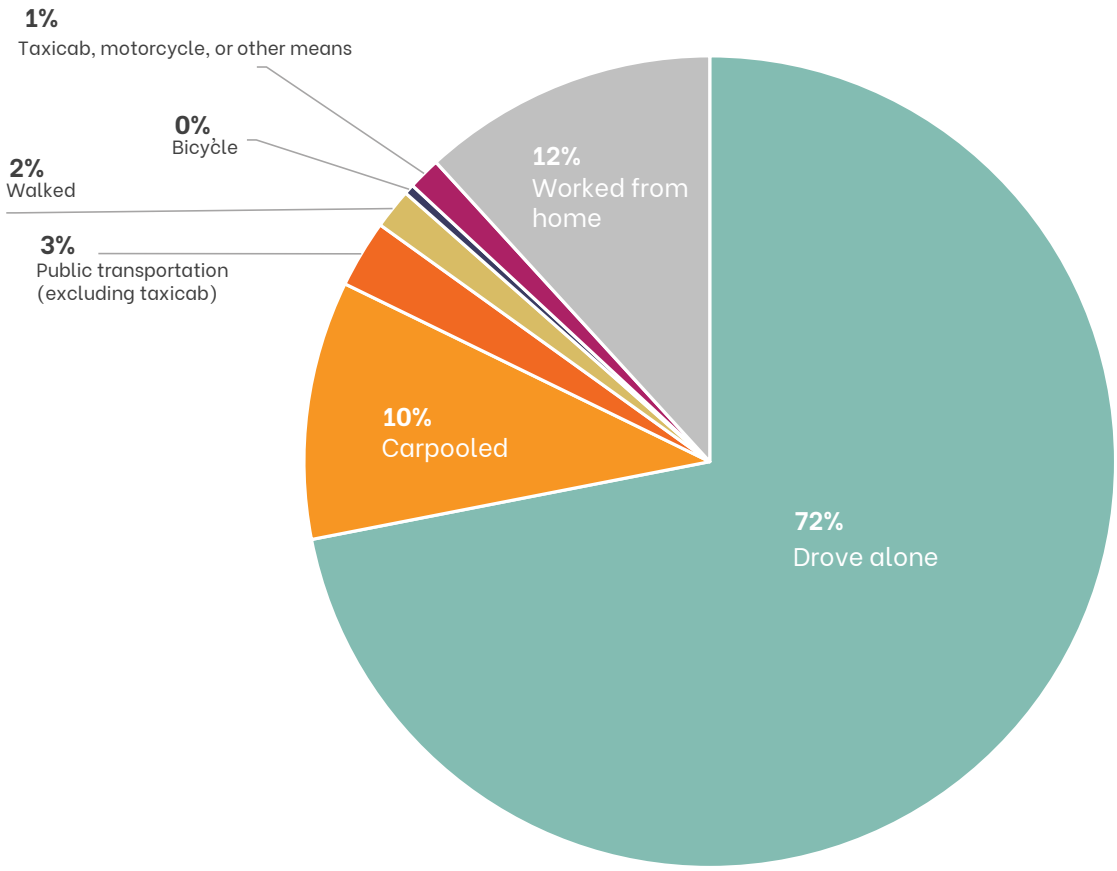
Educational services (21%), and health care and social assistance; Retail trade (12%); Manufacturing (10%); Arts, entertainment, and recreation, and accommodation and food services (10%), are the top four industries by employment.

According to 2019 LEHD Origin Destination Employment Statistics (LODES), only 35% of working Vancouver residents also work in Vancouver. Twenty-two percent (22%) have their place of employment in Portland, OR. The remaining 43% have places of employment nearby such as Camas (3%) and as far away as Seattle, WA (2%). It is important to note the LEHD data is based on administrative records such as unemployment insurance reporting connecting place of residence and place of employment. These numbers reflect both commuters and those who are working remotely. They also do not include self-employed workers who are more likely to work from home.

Unlike the LEHD, the American Community Survey is based on self-reported respondent experiences. Based on 2021 ACS data, the Vancouver workforce largely commutes by car, 72% driving alone and another 10% carpooling. Twelve percent of the workforce works from home.

83% of workers take a motorized vehicle to work, alone or using a taxi or carpool.

Exhibit 25 Means of transportation to work for workers aged 16 and over



Source: American Community Survey 5 year estimates 2017-2021

Relative to their share of the overall population of workers, white workers are the least likely to take public transportation or to carpool, and the most likely to drive alone. Asian workers are also unlikely to take public transportation relative to their share of the total population, but slightly more likely to carpool. The groups most likely to use public transportation are those of two or more races, some other race or Black or African American. There is also a pattern by earnings. Workers earning $24,999 a year or less are more likely to take public transportation than would be expected by their share of the population, and higher income workers are less likely. Carpooling is also relatively more common for workers in the lower earning tiers. Workers around the middle income tiers are the most likely to drive alone to work.

The likelihood of using public transportation to go to work decreases as income increases.

Exhibit 26 Indexed means of transportation to work for workers aged 16 and over, by earnings in the last 12 months

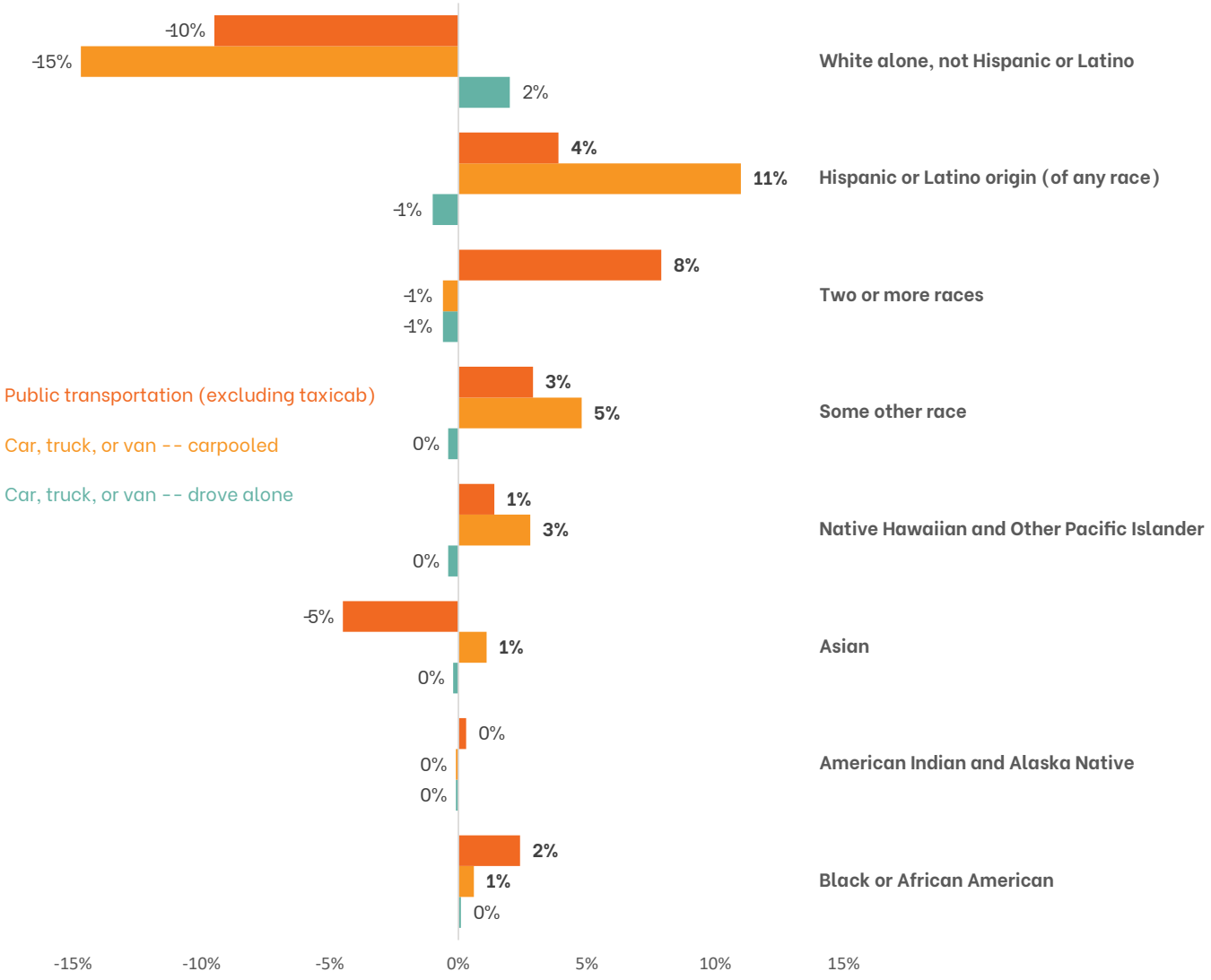


Note: A value of 0 indicates the share of that group using that means of transportation is equal to their share in the overall population)

Source: American Community Survey 5 year estimates 2017-2021

The likelihood of using public transportation to go to work is higher among people of color.

Exhibit 27 Indexed means of transportation to work for workers aged 16 and over, by race and ethnicity in the last 12 months



Note: A value of 0 indicates the share of that group using that means of transportation is equal to their share in the overall population)

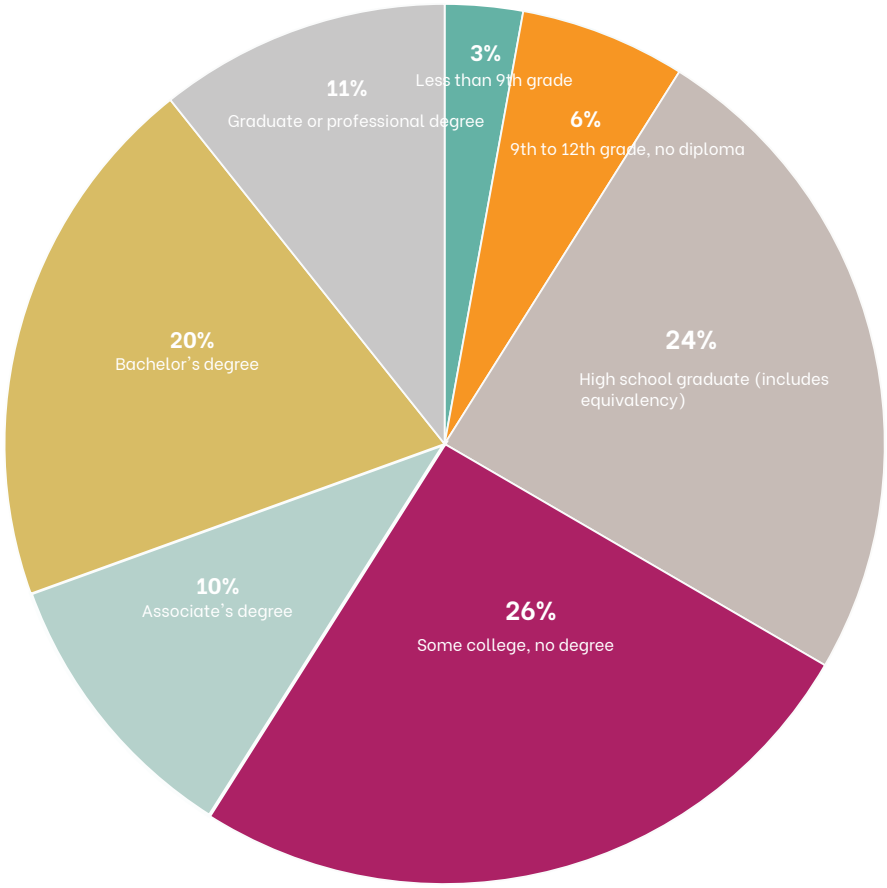
Source: American Community Survey 5 year estimates 2017-2021

Education Access

Ninety-one percent (91%) of Vancouver residents aged 25 or older have a high school diploma or higher level of education. Thirty-one percent (31%) have a Bachelor's degree or higher. One-quarter of the population age 25 or older has some college but no degree and another quarter terminated their education at high school completion or earlier.

More than one-quarter of residents terminated their education at high school graduation or earlier. Another quarter have some college, but no degree.

Exhibit 28 Educational Attainment Among Residents aged 25-years and older



Source: American Community Survey 5-year estimates 2017-2021

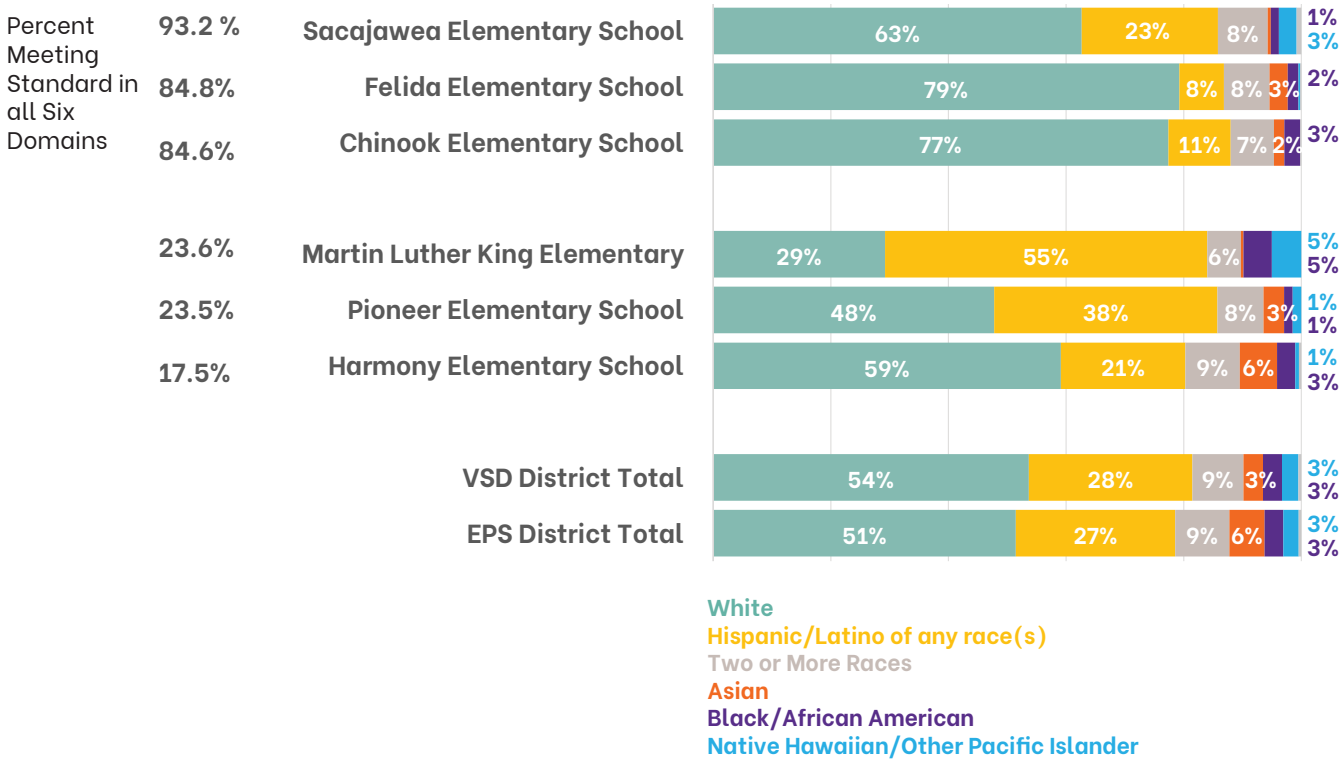
The City of Vancouver is served by two school districts, Vancouver School District and Evergreen Public Schools, both of which also serve portions of Clark County outside of city boundaries. Access to high-quality education within the city and early learning and

childcare system can vary by location within the city and race and ethnicity. The Washington State Office of the Superintendent of Instruction uses an observational whole child assessment to document kindergarten readiness. Six areas of development are assessed: social-emotional, physical, cognitive, language, literacy, and mathematics. Exhibit 29 shows the race and ethnicity composition of the elementary schools with the highest and lowest rates of kindergarten readiness, as measured by the proportion of students observed to be at standard in all six domains. As these assessments are performed early in the school year, they largely reflect a student's experiences and learning before entering public school (rather than school performance per se). At the primary level, school assignments are neighborhood-based in both districts unless a specific exception is granted. Vancouver School District will begin offering two elementary-level school choice programs beginning in the 2023-24 school year. District-wide demographics for Vancouver and Evergreen provide reference points.

The rate of students entering kindergarten fully ready in the top performing school is over five times that of the lowest performing school. White students are much more likely to be in the schools with the highest readiness levels where they comprise about two-thirds to three-quarters of the student population. Hispanic and Latine students are much more likely to be accessing schools in the bottom tiers of kindergarten readiness rates.

There is great disparity in rates of kindergarten readiness among Vancouver elementary schools which are largely neighborhood based.

Exhibit 29 Demographics of Top and Bottom Three Schools by Kindergarten Readiness, 2021-22



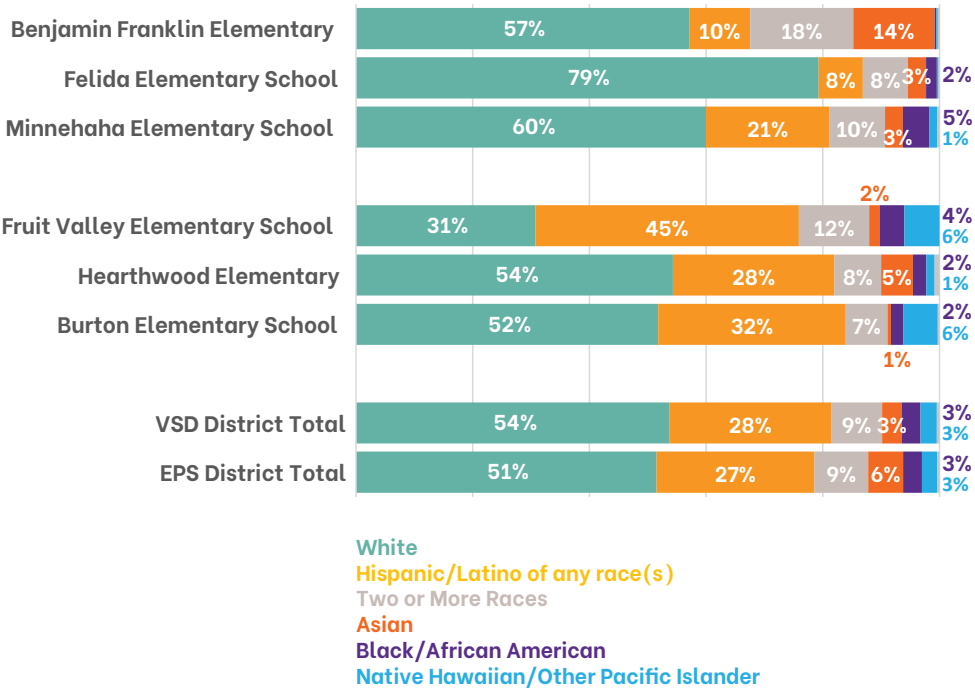
Source: OSPI, 2023

These demographic trends are slightly more pronounced by third grade as shown by proportions of students meeting standard in English Language Arts and Math in Exhibit 30. These assessments are likely to reflect the experiences and resources available to students in the school environment as well as in homes and neighborhoods.

Demographic trends in school performance tend to persist through 3rd grade.

Exhibit 30 Demographics of Top and Bottom Elementary Schools by 3rd Grade Assessment, 2021-22

	ELA	Math
Percent Meeting 3rd Grade Standard in ELA and Math	65.5 %	65.5 %
	67.9%	59.8%
	56.3%	65.3%
	12.9%	12.9%
	24.5%	0%
	0%	19.6%



Source: OSPI, 2023

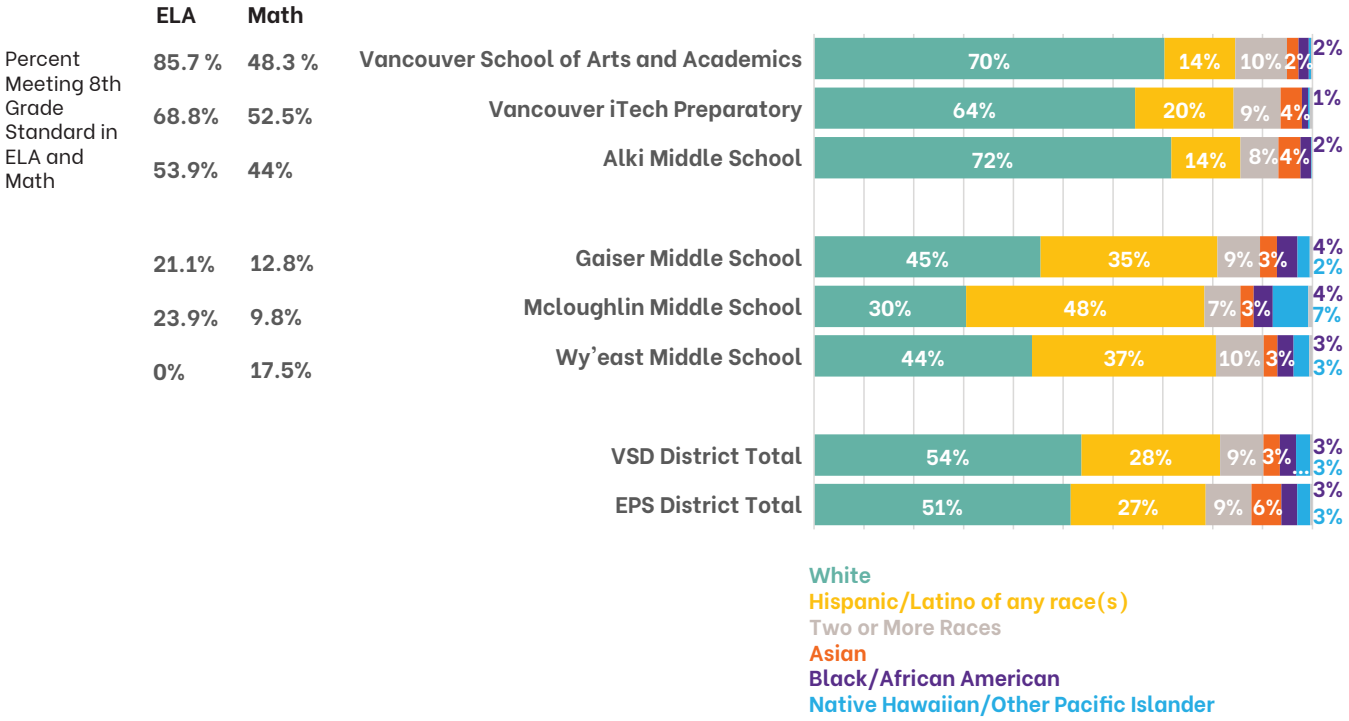
Hispanic/Latine and Native Hawaiian/Other Pacific Islander students continue to be disproportionately attending lower performing schools according to 3rd grade reading and math standards.

School choice, or the ability to attend schools without neighborhood boundaries, is more prevalent in upper levers of education, beginning in the middle school years. The top two performing schools by state 8th grade English Language Arts and Math standards are choice schools with a application processes that prioritize residents in the Vancouver School District, but also admit students from neighboring school districts. While admissions processes are often intended to select students based on merit and demonstrated interest in more specialized education in STEM or Arts, for example, they can unintentionally end up reflecting privilege based on race, income, and other factors outside of student merit and interest. Even in Vancouver's iTech program where the admissions process includes a lottery, white students

are overrepresented compared to district demographics, while Hispanic/Latine, Black, and Native Hawaiian/Other Pacific Islander students are underrepresented.

White students are overrepresented in the highest performing schools by 8th grade standards.

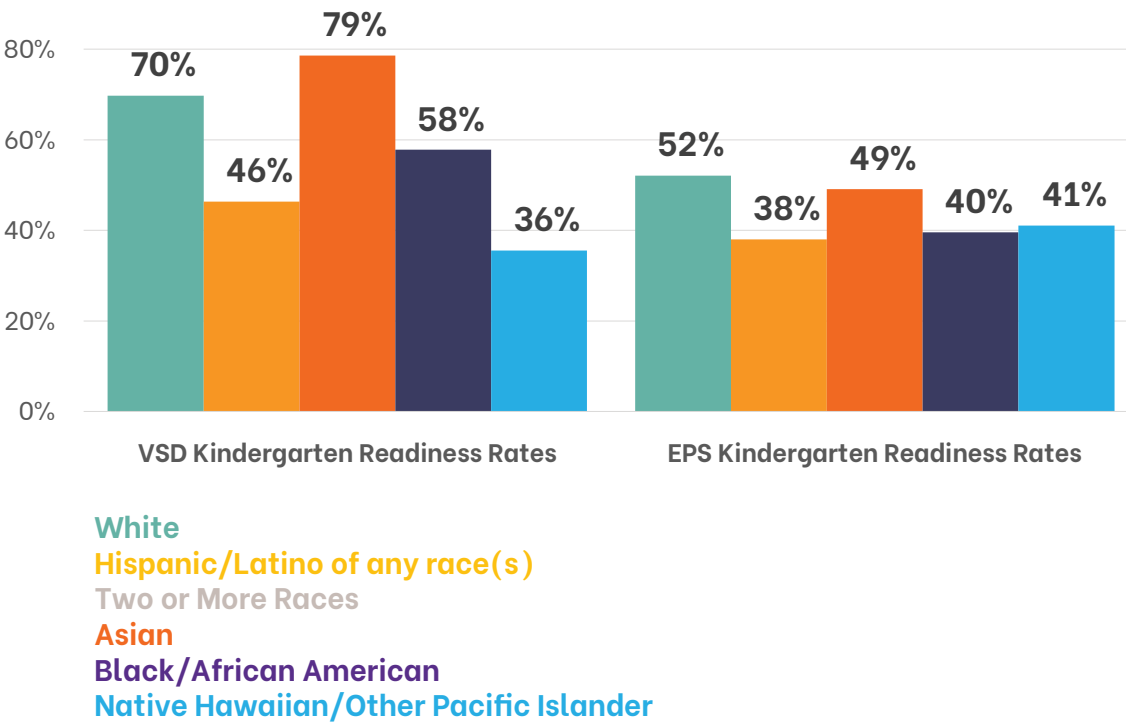
Exhibit 31 Demographics of Top and Bottom Middle Schools by 8th Grade Assessment, 2021-22



Source: OSPI, 2023

Race-based gaps in kindergarten readiness are not as stark as school/neighborhood based gaps

Exhibit 32 Demographics of Students Meeting all Six Domains of Kindergarten Readiness, 2021-22

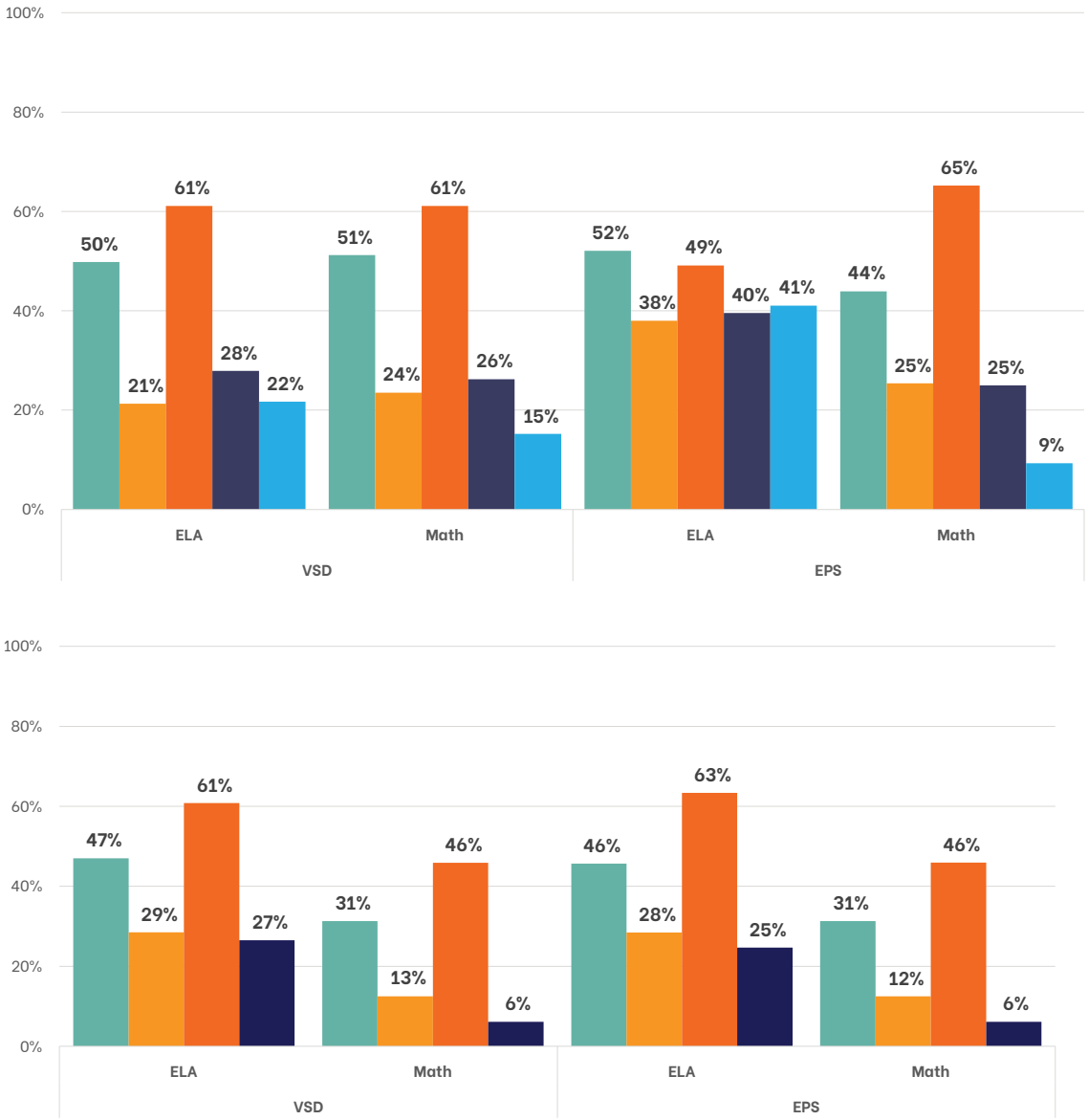


Note: Scores for American Indian/ Alaskan Native students and students of Two or More Races in both grades, and Native Hawaiian and Other Pacific Islanders in 8th grade are suppressed by OSPI due to small numbers and not shown here.
Source: OSPI, 2023

Though some slight variation in school readiness according to race and ethnicity are present upon entry to kindergarten (Exhibit 32), a much greater gap is apparent by third and eighth grades (Exhibit 33).

Asian and white students in the Vancouver and Evergreen School Districts are the most likely to meet 3rd and 8th grade standards.

Exhibit 33 Demographics of Students Meeting Standard by 3rd Grade and 8th Grade Assessments, 2021–22



Note: Scores for American Indian/ Alaskan Native students and students of Two or More Races in both grades, and Native Hawaiian and Other Pacific Islanders in 8th grade are suppressed by OSPI due to small numbers and not shown here.
Source: OSPI, 2023

Parks and Open Space Access

There are gaps in park access, defined as a 10-minute walkshed, throughout the City of Vancouver. Existing parks are smaller and access gaps are more common in the eastern parts of the City including East Mill Plain. The far western reach of the City between the Columbia River and Vancouver Lake also shows a significant gap in park access.

There are significant pockets of Vancouver outside of 10-minute walk to parks.

Exhibit 34 Areas within walkable access of parks



Source: OSPI, 2023; City of Vancouver, 2023.

Vancouver's urban tree canopy coverage is estimated at about 19%. Other cities in Washington that have assessed their urban tree canopy have an average coverage of 32%, while the recommended canopy for maximum benefits is 40%. Urban tree canopies help regulate temperatures, reduce air pollutants, and preserve property values among many other social, economic, and aesthetic benefits. Tree canopy is unevenly distributed in the City, with some neighborhoods enjoying 40% coverage or more (Dubois Park, South Cliff) and others 12% or lower (Bennington, Columbia Way, Esther Short).

Vancouver's tree canopy coverage is about 19%. However, coverage in individual neighborhoods ranges from 9% to 47%.

Exhibit 35 Percent tree canopy coverage by neighborhood

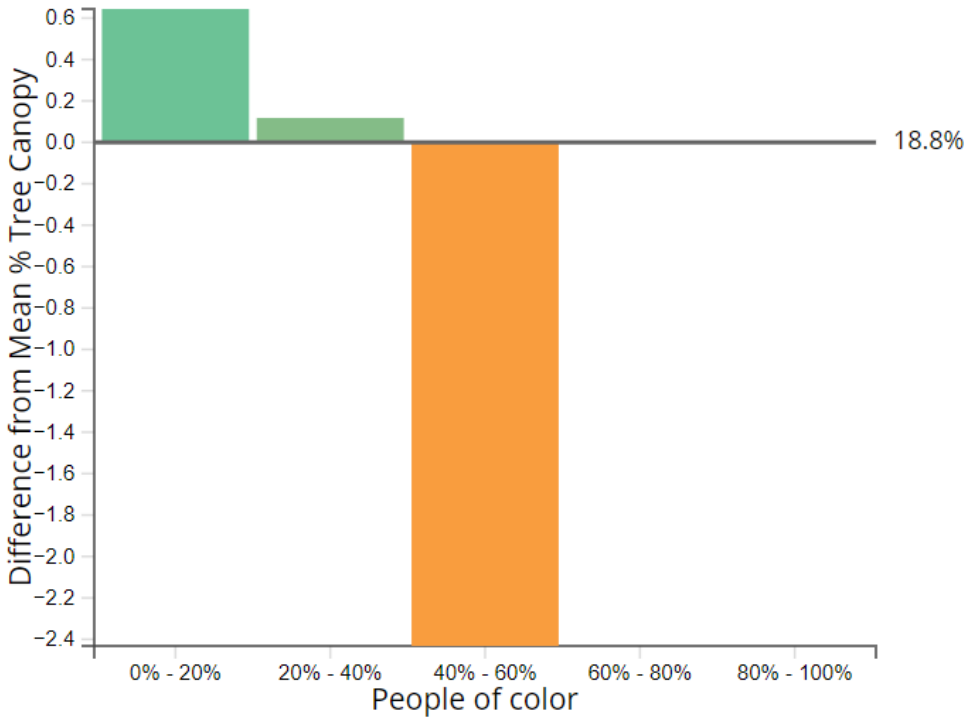
Neighborhoods	Tree Canopy %	Neighborhoods	Tree Canopy %
Airport Green	27%	Marrion	16%
Arnada	18%	Meadow Homes	17%
Bagley Downs	19%	Mountain View	15%
Bella Vista	33%	North Garrison Heights	18%
Bennington	12%	North Hearthwood	20%
Burnt Bridge Creek	19%	North Image	13%
Burton Evergreen	30%	Northcrest	28%
Burton Ridge	20%	Northfield	23%
Carter Park	14%	Northwest	29%
Cascade Highlands	17%	Northwood	34%
Cascade South East	21%	Oakbrook	24%
Central Park	18%	Ogden	19%
Cimarron	19%	Old Evergreen Hwy	35%
Columbia River	31%	Parkside	19%
Columbia Way	12%	Parkway East	15%
Countryside Woods	15%	Riveridge	30%
Dubois Park	40%	Riverview	20%
East Mill Plain	14%	Rose Village	17%
Edgewood Park	30%	Shumway	19%
Ellsworth Springs	29%	South Cliff	47%
Esther Short	9%	Vancouver Heights	22%
Evergreen Highlands	25%	VanMall	17%
Evergreen Shores	26%	Village at Fishers Landing	25%
Fairway/164th Ave.	15%	West Minnehaha	26%
Father Blanchet Park	18%	Wildwood	35%

Source: City of Vancouver, 2021.

Analysis from the Tree Equity Score project demonstrates that block groups housing higher percentages of POC have mean tree canopy 2.2% lower than the citywide average.

Block groups with higher proportions of people of color have 2.4% less tree canopy than the average for the city.

Exhibit 36 Tree canopy coverage in block groups with higher proportions of people of color



Note: Each bar represents the mean tree canopy % for block groups within the specified range of people of color. The amount above or below the thick horizontal line indicates the difference from the area-wide mean canopy %.
Source: Tree Equity Score, 2023. treeequityscore.org/reports/place/vancouver-wa/#13.43/45.61567/-122.63495

Tree cover is densest in park areas, in central neighborhoods with high cover like Dubois and South Cliff, and along public rights of way. Tree canopy is very sparse along the waterfront in Columbia Way and stretching through Fruit Valley to the westernmost parts of the city. To the east and northeast, pockets around East Mill Plain and Bennington and North Image have very low tree cover.

Parks, rights of way, and certain residential neighborhoods in central Vancouver have the most dense tree canopy.

Exhibit 37 Tree canopy coverage



Source: City of Vancouver, 2021.

Criminal Legal System Outcomes

The Equity Team has prioritized reparative policies for a racist history in land use, housing, and the criminal legal system. A few key statistics from recent analysis in the City of Vancouver and Clark County highlight race-based disparities, though a full accounting of the criminal legal system is beyond the scope of this analysis.

The 2021 Report to the Washington Supreme Court, Race and Washington's Criminal Justice System examined disproportionate use of force outcomes in the City of Vancouver as a case study. The report found that "For uses of force in 2020, relative to Vancouver City demographics, a Black person is 10.6 times more likely than a White person to be the subject of police use of force; a Pacific Islander is 2.7 times more likely. A Latina/o person is about as likely to be the recipient of force as a White person, and an Asian person and an Indigenous person was 0.7 times as likely as a White person to be subjected to force" Vancouver had the highest disproportionality in use of force on Black people among the four case study cities of Seattle, Spokane, Tacoma, and Vancouver.

The report also demonstrates race and ethnicity-based biases in the criminal legal system at the state and county level from policing, prosecution, sentencing, incarceration and re-entry. Counties with lower proportions of Black residents are found to have higher disproportionalities. For example, "Clark County, where 86.1 percent of the population is White and 2.4 percent is Black, the percentage of Black drivers charged with DWLS3 (Driving with License Suspended) between 2010-2020 comprised roughly five to six times their percentage in the county's population and showed an upward trend during the decade. In comparison, the percentage of charges brought against White drivers reflected well below the 86.1 percent of White residents living in Clark County and showed a downward trend over the same ten-year period."

Engagement Themes

As part of Our Vancouver, the City of Vancouver's comprehensive plan update process, the City began conducting outreach and engagement to the community in early 2023 to gain a better understanding of planning priorities among community members. Outreach was primarily conducted as part of existing City events from the spring through fall of 2023. More information about this outreach can be found on the project's website: www.beheardvancouver.org/plan2045. Common themes that emerged during outreach include housing, transportation, accessibility of services, and parks and green space.

Housing

Housing-related comments were one of the most common comment themes that emerged during engagement. Community members expressed the need for more housing, more options for different types of housing, and the need to provide housing for those experiencing homelessness and supportive services for those who are at risk of losing housing. Community members also expressed concerns about the affordability of housing and the increasing cost of housing, especially compared to the cost of living.

Relevant Equity Analysis Findings

- Housing and Mobility (pg 36)

Transportation

Many community members commented on transportation issues, including the state of repair of roadways, the need for better and more efficient transportation options, and safety improvements for pedestrians and bicyclists. Suggestions for improved transportation options included improving the viability and efficiency of bus

transit compared to driving, expanding C-Tran routes (including to new developments, Battle Ground, and to Portland via light-rail). Community members also pointed to the lack of bicycle safety in various parts of the City as reasons why they feel compelled to drive to frequent destinations like the grocery store or school. Lack of pedestrian safety and ADA accessibility on sidewalks was cited as a barrier to using local bus stops. Some community members also cited speeding as a pedestrian and bicycle safety issue.

Community members also expressed interest in increased micro-mobility options like scooters and e-bike hubs.

Relevant Equity Analysis Findings

- Employment and Transportation to Work (pg 45)

Accessibility of Services

Community members expressed support for walkable neighborhoods with more amenities. Community members frequently identified large or unused parking lots as opportunities to add valuable retail, housing, or green space. Desire for locally-owned, affordable small businesses was also a common theme in responses. Community members also expressed a desire for more third spaces in their communities (i.e., spaces to meet others outside of where they work or live).

Relevant Equity Analysis Findings

- Food Access (pg 33)
- Education Access (pg 50)

Parks and Green Space

Community members frequently commented that they feel a sense of belonging and connection to the various public spaces and amenities in Vancouver. Participants mentioned city parks, community centers, the downtown library, farmers markets, downtown businesses, and the waterfront as their favorite places to find and build community. People also expressed desire for more paths and trails, facilities and activities for youth (including indoor activity spaces), and gardens and green spaces. A few people identified specific parks like Chelea Anderson Memorial Park as

great examples of what they would like to see in other parts of the City, including East Vancouver. Comments about increasing the tree canopy across the city were also common, citing heat and lack of shade as concerns.

Relevant Equity Analysis Findings

- Parks and Open Space Access (pg 57)

ENDNOTES

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Memorandum

To: City of Vancouver

From: Tyler Bump, Mike Wilkerson, Jennifer Cannon, Kaitlin La Bonte, Justin Sherrill, Mackenzie Visser, Jamil Ditter; ECOnorthwest

CC: Nicole McDermott, Brian Carrico; WSP

Subject: FINAL Housing Needs Assessment, City of Vancouver Comprehensive Plan Update

Date: April 2024

Acknowledgements

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Executive summary

Community demographic and household trends

Vancouver and the region have grown substantially over the last two decades and are projected to continue to grow over the 20-year planning period (2025–2045). From 2000 to 2023, Vancouver's population even with annexation grew by just over 56,000 residents, or 39%, which is higher than Washington state (35%) but lower than Clark County as a whole (53%). The pandemic may have shifted or accelerated migration patterns and housing preferences permanently, and Portland outmigration has contributed to Clark County's rapid growth.

Vancouver's population is getting older. The share of Vancouver residents aged 65 years and older increased from 13% in 2011 to 19% in 2021, a higher share than in Clark County overall. At the same time, the share of residents under 20 years fell from 25% to 20% of the population.

Vancouver became more racially and ethnically diverse over the last decade. From 2011 to 2021, the Hispanic and Latino population increased by two percentage points (from 9% to 11%), the Asian population rose by two percentage points (from 6% to 8%), and the Black population grew by two percentage points (from 3% to 5%).

Vancouver households tend to have lower incomes compared to Clark County. The city's median household income is around $70,000 per year, roughly $14,000 less than the countywide median of $84,000. In addition, a larger share of Vancouver households earns less than $75,000 per year, and a smaller share earning more than $100,000 annually than the County overall. As of 2023, the area median income (AMI) determined by the US Department of Housing and Urban Development (HUD) for the Portland-Vancouver-Hillsboro Metropolitan Statistical Area (MSA) was $114,400 for a family of four.

Vancouver's average household size decreased slightly from 2.4 persons in 2011 to 2.3 in 2021 and the overall share of households with children declined. The share of one- and two-person households increased, while three- and four-person households decreased. In addition, the percent of households with children dropped by seven percentage points in Vancouver between 2011 and 2021.

About a third of Vancouver workers live in Vancouver. The most common workplace destination for Vancouver residents is Portland while the most common area Vancouver workers reside (besides Vancouver) is unincorporated Clark County. As of 2021 the City of Vancouver had a higher jobs-to-housing ratio than the County's goal of 1:1, with 1.18 jobs for every household compared to 0.82 jobs for every household in Clark County (see Vancouver Economic Opportunity Analysis for additional detail). This trend is reflective of Vancouver's role as an employment hub but could also indicate a shortage of housing options available for Vancouver workers.

Housing conditions and trends

Housing costs have rapidly increased. Both rental and ownership costs have far outpaced income growth in the city, with median home prices nearly tripling and average rents increasing 60% from 2012 to 2023. The widening gap between housing costs and incomes indicates declining affordability in Vancouver's ownership and rental market. Likewise, rents in Vancouver are rising faster than income, increasing 60 percent since 2011 while income has not increased proportionately (rising only 43 percent from 2011–2021 in nominal dollars or 19 percent when adjusted for inflation). Average rents have also increased in the city with a 56% change from $1,070 in 2012 to $1,673 in 2023, surpassing rents in Portland.

Just under half of Vancouver households rent their homes (48%) and over half (52%) own their homes, which is a lower homeownership rate than Clark County (65%) and the state but similar to other nearby cities.

Similar to other communities, cost burdening tends to be higher for renters compared to homeowners. For these renters, cost-burden rates increased slightly from 2011 to 2021 and now sit at 57% overall, with 27% severely cost-burdened. With over one-quarter of renters spending more than half of their income on housing (severely cost-burdened), this highlights the need for more affordable rental units and homeownership opportunities, particularly for lower-income households in Vancouver.

Vancouver had the lowest share of remote workers[1] overall, at just 17%, compared with Hillsboro, at 25%, and Portland, at 29%. However, this share is substantial enough to monitor and track to help understand how this might affect housing needs.

Vancouver's dominant type of housing is single-detached housing, which comprises more than half of the of the total number of housing units in the city. However, Vancouver has a lower share of single-detached housing (at 56%) compared to the County (at 72%). The remaining housing stock in Vancouver includes an estimated 27% multifamily housing and 18% "plex housing" which is attached units up to fourplexes (according to U.S. Census data, 2021).

Vancouver has a higher share of multi-unit housing than the county overall, with slightly under half (around 44%) of total housing units in structures including more than one housing unit (such as a single-family detached housing). Permit data analysis shows a steady increase in multifamily development in recent years. Nearly 80% of new multifamily housing developments permitted from 2019–2021 had greater than five units. This points to opportunities to diversify the housing mix, especially expanding middle housing options like duplexes, triplexes, and townhomes.

Racial disparities exist in Vancouver's housing access. White households have higher rates of homeownership than Hispanic and Black households; at the same time, Hispanic and Black households have the highest cost-burden rates.

Vancouver provides a substantial number of affordable housing units in the county, with 1,243 rent restricted affordable units sponsored by the City's Affordable Housing Fund that are either existing or currently in progress for development. Of these units, 26% are set aside for seniors, 43% are reserved for households earning less than 60% of AMI, and 9% of the units are set aside specifically for populations with disabilities or mental health issues.

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[1] Remote workers are calculated using data from the American Community Survey. This data is derived from a question in the 2022 ACS form about means of transportation to work that asks respondents 'How did you usually get to work last week?' While this variable does not specifically separate between fully remote and hybrid workers, it is at minimum representative of individuals that worked from home more frequently than commuting to a workplace.

Housing need

The City of Vancouver believes Clark County will continue to see strong growth in population. The Office of Financial Management's (OFM) middle range forecast, the most accurate forecast provided by the state, estimates that Clark County's population is most likely to increase to 698,416 by 2045, indicating the need for an additional 107,193 housing units for the whole county. The City believes it will continue to attract the same share of the likely county growth it has seen in the recent decade (42%). To estimate the housing need in Vancouver from 2023 to 2045, additional adjustments were made to the Washington State Department of Commerce Housing for All Planning Tool to account for smaller household sizes, higher vacancy rates due to the higher share of multifamily units, providing for the loss of units to second/vacation homes, accounting for the demolition of some existing units, and accounting for recent housing construction built from 2020 to 2023.

The results of this analysis indicate a total of 38,129 housing units are needed by 2045 in the City of Vancouver. Overall, this means an estimated 1,733 housing units need to be built or created per year from 2023 to 2045 to meet the housing need in the City of Vancouver. Since the existing City of Vancouver housing stock has increased by around 1,466 housing units per year over the last decade from 2012 to 2022 (per OFM data), this means that housing production will need to increase by around 267 housing units per year.

The housing needed for the city should be inclusively provided for different income levels and abilities. The 2045 housing target the following types of units in the above total:

- **Around 2,651 Permanent Supportive Housing (PSH) units;**
- **Estimated 4,371 units for households below 30% AMI (extremely low income);**
- **Around 5,890 units between 30 to 50% AMI and 5,788 housing units between 50 and 80% AMI (low income);**
- **Around 3,351 units between 80 to 100% AMI (moderate income);**
- **Estimated 3,175 housing units between 100 to 120% AMI (moderate to middle income);**
- **Around 12,902 housing units over 120% AMI (high income); and**
- **Approximately 1,374 emergency shelter beds.**

The 1,733 is an equal distribution of needed units across the 20-year time horizon of the Comprehensive Plan and is intended to guide land use actions that accommodate the total number over that time frame. The city also has a 10-Year Housing Action Plan that front loads needed production and calls for 2,500 units per year. This is because the City doesn't not want to wait the full 20-years to meet community housing needs, and our existing policy calls on us to pull every lever to increase housing production across the city. It's important to be clear that the land use designations put in place to accommodate the 20-year need will also support the shorter timeline identified in the Housing Action Plan.

Policy implications

Given Vancouver's current and future housing needs, the City should consider the following policy approaches:

- **Support increased housing production in the City of Vancouver to help meet the housing target set for 2045.** Since the existing City of Vancouver housing stock has increased by around 1,466 housing units per year over the last decade from 2012 to 2022 (per OFM data), this means that housing production will need to increase by around 267 housing units per year. The City will need to identify policies and program to help support increased production of housing targets for the different income brackets and for permanent supportive housing units and emergency shelter beds.
- **Encourage more diverse housing types, scales, and densities to meet the needs of different household sizes, ages, and incomes**. With an aging population, smaller households, and lower incomes, the city would benefit from additional housing diversity. To encourage this, the City should prioritize development of affordable and middle housing options, such as townhomes, duplexes, triplexes, courtyard apartments, and more. These can provide attainable options for varying household sizes and incomes.
- **Examine zoning and regulations to identify barriers to achieving greater density in appropriate areas.** Achieving greater density, especially through a diverse array of housing types, will help make Vancouver housing more affordable for both homeowners and renters.
- **Support accessible design and visitability in new housing to accommodate seniors aging in place.** With more older residents, accessibility is increasingly important.

- **Grow programs and incentives that support affordable housing development, including partnerships with nonprofit housing developers.** In addition, the City should leverage opportunities for affordable housing in transit-served locations.
- **Strengthen tenant protections and support programs to minimize displacement of lower income households and communities of color.** Rising prices often increase displacement risk for more vulnerable communities, and renters and communities of color are more likely to experience cost burdening.

Section 1. Introduction

Introduction and project approach

The City of Vancouver is updating its Comprehensive Plan and development regulations. This will include an updated 20-year vision statement for 2025 to 2045 and associated policies and implementation measures. The updated plan must be responsive to the changing community dynamics and the strategic vision established by the City and include focused goals to address social inequities and climate change.

The Comprehensive Plan is a foundational document that provides an overall vision and policy direction for managing growth and development while considering effects on the built and natural environment and public facilities. The Plan will build from the City's 2023-2029 Strategic Plan and is informed by other policy and plan documents, including the Climate Action Framework and Climate Adaptation Strategy, Housing Action Plan, Transportation System Plan, Parks Recreation and Cultural Services Comprehensive Plan, Urban Forestry Management Plan, and Reside Vancouver Anti-Displacement Plan.

Housing Element Purpose

The Housing Element will include recalibrated goals and policies to help correct for persistent underproduction, and better accommodate the diverse household needs of the whole community across the income spectrum for the next 20 years from 2025 to 2045.

The current Plan was originally adopted in 1994 in response to the enactment of the Washington State (State) Growth Management Act (GMA). In 2004, a comprehensive update to the Plan was completed and a minor update was done in 2011, as required by the GMA. The city has changed substantially in the 20 years since 2004, particularly since the last update in 2011. The city is transitioning from a primarily suburban community to an active urban center with an increasingly diverse community, and this plan will reflect these changing dynamics.

ECOnorthwest is assisting the City with updating the Housing Element and Economic Development Element chapters of the plan. The Housing Element will

include recalibrated goals and policies to help correct for persistent underproduction and better accommodate the diverse household needs of the whole community across the income spectrum for the next 20 years from 2025 to 2045. The city is facing serious housing challenges, including increased homelessness and a lack of affordability, which will benefit from improved access to more housing options, innovative housing types, and low barrier housing, all while supporting equitable outcomes and minimizing displacement pressures. The housing policy approach will focus on effectively bridging the gap in housing needs, customized to Vancouver's unique community conditions. This plan will also build off of recent findings from the City of Vancouver Housing Action Plan (updated in 2023).

The approach for updating the Housing Element begins with a Housing Needs Assessment (HNA). The HNA evaluates current housing stock and supply, existing conditions and housing needs across the income spectrum, and the current and projected future demand for housing to help inform policy updates. The HNA identifies and defines the range of housing needs by analyzing the best available data describing Vancouver's housing stock, workforce, household demographics, housing market dynamics, and expected housing demand. The insights from this analysis will build a factual basis for the housing policy updates. This housing analysis answers questions about the current availability of different housing types, who lives and works in the Vancouver area, and what range of housing is needed to meet current and future housing needs. The housing policy updates, to be developed in the next stage of this project, will guide changes to housing policies, programmatic investments and related decisions over the 2025–2045 planning period. Housing needs are not one-size-fits-all and instead should be thought as a menu of different options with sufficient variety for different household incomes and sizes, life stages of people, location needs, and culturally-specific housing. The lack of housing diversity meeting different needs has a compounding effect on the housing problem.

Housing analysis is an important exercise as a community's housing needs tend to continually evolve based on changes in the broader economy, local demographics, and the regulatory environment. The City of Vancouver, like other communities in the region, has changed over the years and housing needs have not always been successfully met. The affordability of housing has changed, and access to housing has never been equal, especially for low-income families and communities of color. A major component of the Comprehensive Plan update is

analyzing and planning for housing that reflects current community trends in household formation, demographic shifts, and an increasingly diverse population that have culturally-specific housing needs.

Analyzing housing needs is complex because it represents a bundle of services that people are willing or able to pay for, including shelter and proximity to other essential places and public services (e.g., jobs, education, healthcare, public transit options, shopping, recreation, etc.) and amenities (e.g., type and quality of home fixtures and appliances, landscaping, views). Since it is difficult to maximize all these services while minimizing costs, households must make decisions about trade-offs and sacrifices between needed services and what they can afford. Residents contemplate a variety of factors to choose where they live, such as the proximity to jobs, childcare, schools, transportation options, amenities, community support networks, and distinct neighborhoods. In addition, a household's needs are often driven by the affordability level, size, conditions, tenancy type, and other considerations associated with the housing (such as ADA accessibility, lower maintenance costs, etc.).

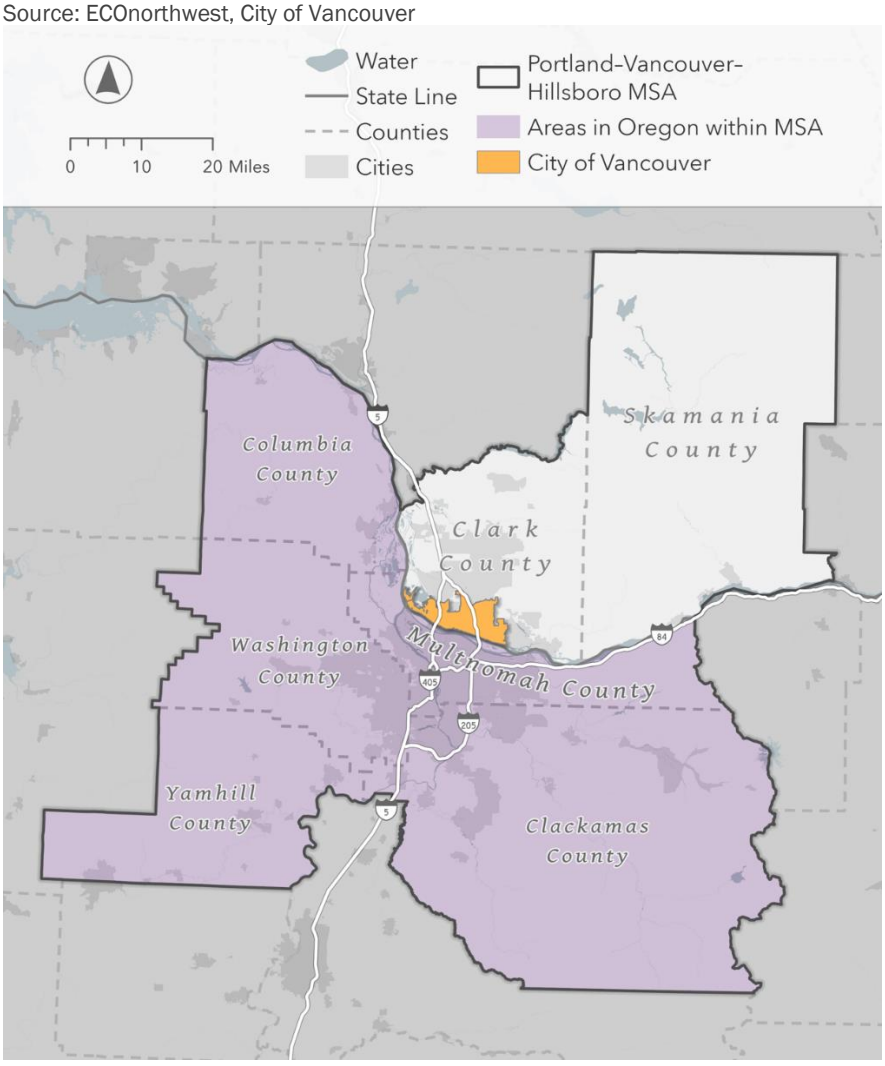
In addition, housing markets function at a regional scale, which makes it challenging for individual jurisdictions to adequately address issues without regional partnerships. Vancouver is part of Clark County, the fastest growing county within the broader Portland-Vancouver metropolitan area.[2] Vancouver is highly accessible to communities to the south, including the City of Portland, and to other fast-growing Clark County cities, such as Ridgefield, La Center, Battle Ground and Camas, as well as unincorporated areas that are increasingly developing at urban densities. As the region grows, Vancouver will need to plan for local impacts and guide growth to align with statewide requirements in Washington's GMA to encourage development in urban areas and ensure access to housing and economic opportunities. The housing market dynamics in the broader region directly affect Vancouver; thus, the full Portland-Vancouver Metropolitan Statistical Area (MSA) was analyzed in addition to Vancouver's local market. The following assessment offers insights on influential national and regional trends to help build a more comprehensive understanding of the housing landscape.

[2] Throughout this report the City of Vancouver is referred to as Vancouver.

Study area: City of Vancouver and surrounding region

The City of Vancouver is a highly desirable place to live, offering a high quality of life, a prime location, access to a bustling pedestrian friendly downtown, and various natural, cultural, and public amenities. Vancouver is the fourth largest city in Washington State, the second largest city in the Portland-Vancouver metropolitan region, and the largest city in Clark County. The City of Portland is located directly south of the City of Vancouver and easily accessible from Interstate (I) 5 and (I) 205 across the Columbia River (see Exhibit 1 below). This housing needs analysis includes many comparisons to the City of Vancouver and to Clark County as a whole, including both incorporated and unincorporated areas in the county, and in some cases, other cities, including the City of Portland, to provide helpful comparisons.

Exhibit 1: Study area map
Source: ECOnorthwest, City of Vancouver



Due to relatively low property taxes, high quality public schools and housing prices that were comparatively more affordable than Portland until the last few years, Vancouver has absorbed much of the Portland metropolitan region's population growth over the past decade. The increased demand for housing associated with this growth as well as decades of exclusionary housing policy and underproduction have led to stark housing price increases in Vancouver. Median housing sales prices doubled over the past decade and the cost of average market rent for a one-bedroom apartment was roughly $1,752 in 2023, (2023) surpassing the cost in Portland of $1,566.

Vancouver's housing market is struggling to keep pace with growth and increased demand. Housing costs and rental rates have increased, making it challenging for many renters, first-time homeowners and low-to-moderate income households to find or stay in housing in the city This issue is occurring in neighborhoods across Vancouver and the city will continue to face affordability challenges in the coming years as it continues to grow. Vancouver's vibrant downtown, great neighborhoods and schools, and various natural and cultural amenities will likely continue to attract new people and lead to continued growth.

Section 2. Community and household demographics

Population and housing characteristics are useful for developing a better understanding of Vancouver and its residents. Characteristics such as population growth, age of residents, household size and composition, homeownership, and ethnicity provide useful context about the Vancouver community the trends and forces affecting housing demand, and who the housing market is and is not serving.

Vancouver Population Growth

At almost 200,000 persons, the City of Vancouver is the fourth largest city, based on population, in the State of Washington (below the cities of Seattle, Spokane, and Tacoma but above the City of Bellevue).

This assessment relied on published data primarily from the U.S. Census Bureau, CoStar, Washington Office of Financial Management, U.S. Department of Housing and Urban Development, Clark County, and the City of Vancouver (see the HNA Appendix for more detail on the main data sources used).

Population growth

The Washington State Office of Financial Management (OFM) provides official state and local population estimates and projections for use in the allocation of funds, growth management, and other planning functions. This section utilizes official population estimates from 2000-2023 to understand Vancouver's population growth over the last few decades. Population growth and household formation are the primary drivers of demand for housing. The rate of population growth and household characteristics heavily influence the demand for specific housing types.

Population growth from 2000 to 2023

Vancouver and the broader Clark County region have grown substantially over the last two decades and are projected to continue to grow over the 20-year planning period. From 2000 to 2023, Vancouver's population grew by just over 56,000 residents, or 39%, an annualized compounded growth rate of 1.4% growth per year. At almost 200,000 people, the City of Vancouver is the fourth

largest city, based on population, in the State of Washington (below the cities of Seattle, Spokane, and Tacoma but above the City of Bellevue).[3] Clark County has experienced higher population growth than the City of Vancouver largely due to suburban housing development in greenfield areas outside of the city, particularly in unincorporated areas to the north, east and west.

Exhibit 2: Population growth, Vancouver, Clark County, and Washington, 2000-2023
Source: ECOnorthwest, Office of Financial Management Population Estimates.[4]

Area	2000	2010	2023	Change, 2000-2023	Percent Change, 2000-2023	Annualized Compounded Growth Rate
City of Vancouver	143,560	161,791	199,600	56,040	39%	1.4%
Clark County	345,238	425,363	527,400	182,162	53%	1.9%
State of Washington	5,894,143	6,724,540	7,951,150	2,057,007	35%	1.3%

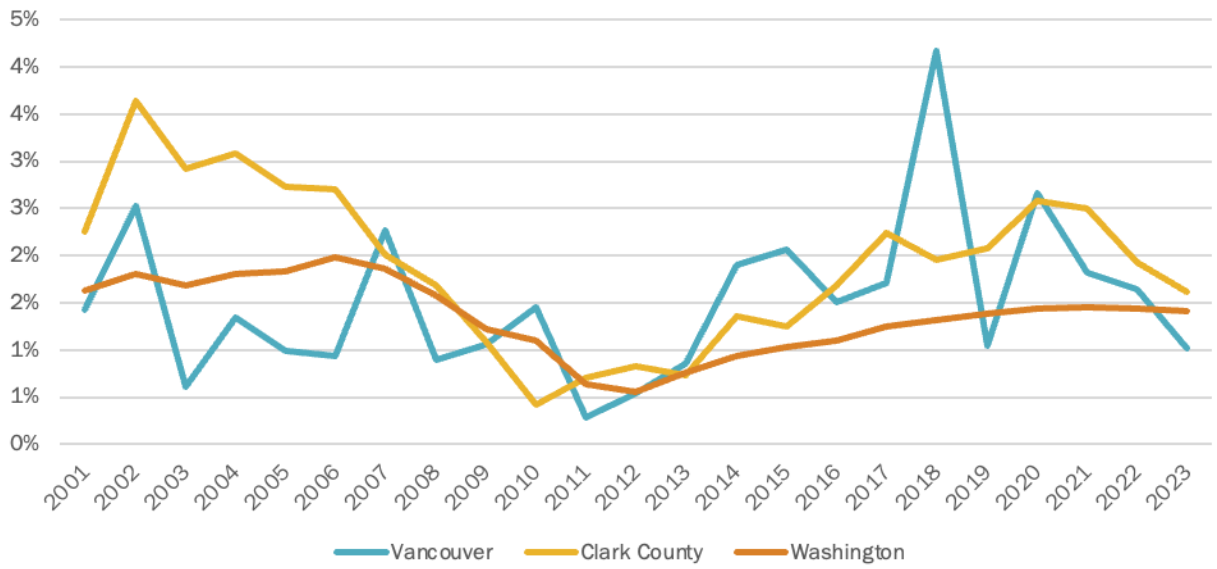
Exhibit 3 below shows the change in population growth year-over-year since 2000 in Vancouver, Park County, and Washington. Vancouver has experienced several years with spikes in population growth which may align with city annexations from the UGA.

[3] Washington State Office of Financial Management analysis of U.S. Census data, 2021: https://ofm.wa.gov/washington-data-research/population-demographics/population-estimates/population-density

[4] Between 2010 to 2020, several areas were annexed into the City of Vancouver which increased the population by approximately 6,126 persons. If the annexation was deducted from the 2023 population estimate, the percent change would be 35% rather than 39%.

Exhibit 3: Population growth change year-over-year, Vancouver, Clark County, and Washington, 2000-2023

Source: ECOnorthwest, Office of Financial Management Population Estimates.[5]



Demographic information

Demographic information can be an indicator of a city's overall population trends. For demographic data, ECOnorthwest primarily used the 2021 American Community Survey (ACS) 1-year Estimates, which is the most current data set available. Key findings include:

- Vancouver's median age is 39 years, similar to Clark County but slightly higher than Hillsboro, Portland, and Washington State.
- Vancouver's largest age group is residents aged 20 to 34 years, representing roughly a quarter of the population (24%). From 2011 to 2021, the share of residents under 20 years decreased from 25% to 20%, while the share older than 65 increased from 13% to 19%.
- Both Vancouver and Clark County became more racially and ethnically diverse between 2011 and 2021. Communities of color increased from 24% to 33% of the total Vancouver population over the last decade from 2011 to 2021, encompassing one-third of the total population. Vancouver saw increases by two percentage points in its Hispanic/Latino population (from 9

[5] Between 2010 to 2020, several areas were annexed into the City of Vancouver which increased the population by approximately 6,126 persons. If the annexation was deducted from the 2023 population estimate, the percent change would be 35% rather than 39%.

to 11%), Asian population (from 6 to 8%), multiracial population (from 5 to 7%), and Black population (3 to 5%).

Age

Households make different housing choices at different stages of life to fit their changing needs; for example, the type of housing needed for a 20-year-old college student or young worker differs from that of a 40-year-old parent with children, or an 80-year-old single adult. Exhibit 4 shows the median age for Vancouver and comparison geographies. Vancouver has the highest median age of 39.4, just slightly older than the county overall.

Exhibit 4: Median age, Vancouver and comparison geographies, 2021
Source: ACS 1-Year Data Tables, Table S0101, 2021

39.4 years	39.2 years	34.8 years	38.3 years	38.2 years
City of Vancouver	Clark County	City of Hillsboro	City of Portland	State of Washington

Exhibit 5 shows the change in median age from 2011 to 2021. All jurisdictions increased in age over the time period, with Vancouver's median age increasing by 1.4 years, a slightly lower change than the Clark County.

Exhibit 5: Change in median age, Vancouver and comparison geographies, 2011–2021
Source: ACS 1-Year Data Tables, Table S0101, 2011, 2021

	2011	2021	Change
City of Vancouver	38.0	39.4	1.4 years
Clark County	37.0	39.2	2.2 years
City of Hillsboro	32.2	34.8	2.6 years
City of Portland	35.7	38.3	2.6 years
State of Washington	37.3	38.2	0.9 years

Exhibit 6 shows the distribution of different age groups. In the City of Vancouver, the largest age group is residents aged 20 to 34 years (24%). Compared to Clark County, Vancouver has a similar share of residents between the ages of 35 and 64, and a slightly higher share of residents older than 65 years (19%). While the county's largest age group is residents under 20 years (25%), only 20 percent of Vancouver's population is under 20 years of age.

Exhibit 6: Age distribution, Vancouver and comparison geographies, 2021
Source: ACS 1-Year Data Tables, Table B01001, 2021

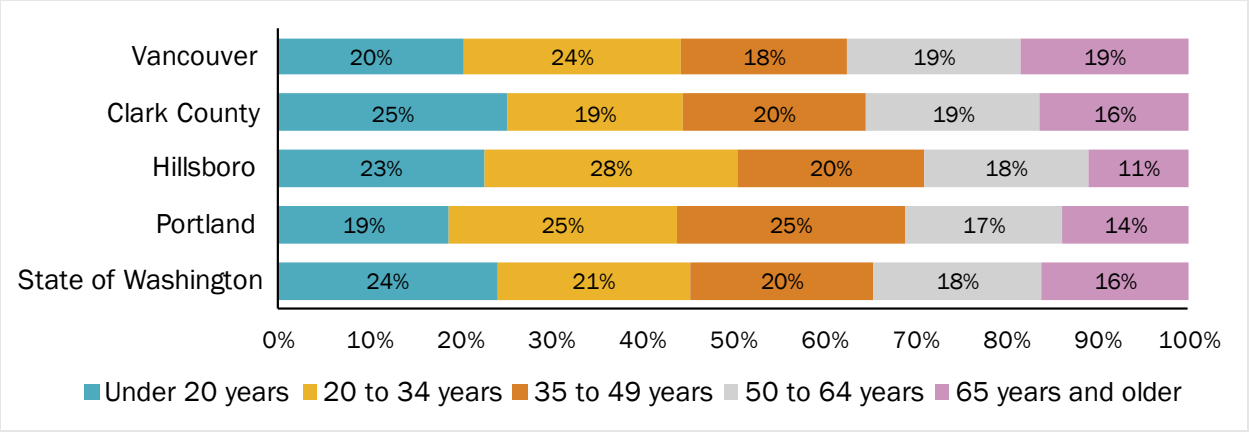
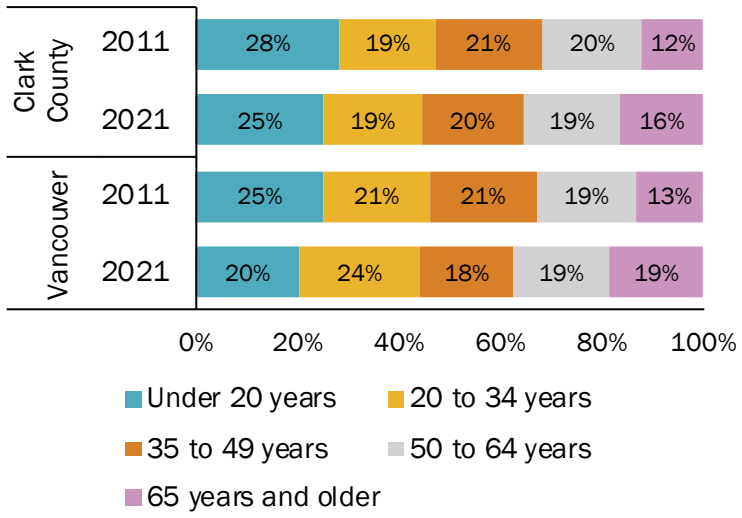


Exhibit 7 shows the change in age distribution for Vancouver and Clark County. In both jurisdictions, the share of residents under 20 years decreased (5% in Vancouver). On the other end of the spectrum, the share of residents over 65 years increased in both jurisdictions, specifically by six percentage points from 13% to 19% in the City of Vancouver from 2011 to 2021. In the county overall, the share of residents between 20 and 65 years remained relatively stable, while in Vancouver the share of residents aged 20 to 34 years increased by 3%, and the share of residents aged 35 to 49 years decreased 3%.

Exhibit 7: Change in age distribution, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table B01001, 2011, 2021



Prime working age is generally defined as workers aged between 25 to 54 years. Vancouver's share of prime working population (20 to 49 years) is similar to Clark County and only slightly decreased from 2011 to 2021.

Race and ethnicity

Exhibit 8 shows the change in the distribution of residents by race and ethnicity from 2011 to 2021. In both Vancouver and Clark County, much of the population is White, with 67% of residents identifying as White in Vancouver and 74% in the county overall.[6] However, Vancouver has a higher share of Black or African American residents as well as Asian residents than the county overall. Both jurisdictions became more racially and ethnically diverse over the last decade. Notably, Vancouver saw increases by two percentage points in its Hispanic and Latino population (from 9 to 11%), Asian population (from 6 to 8%), multiracial population (from 5 to 7%), and Black population (from 3 to 5%).

Exhibit 8: Change in race and ethnicity distribution, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table B03002, 2011, 2021

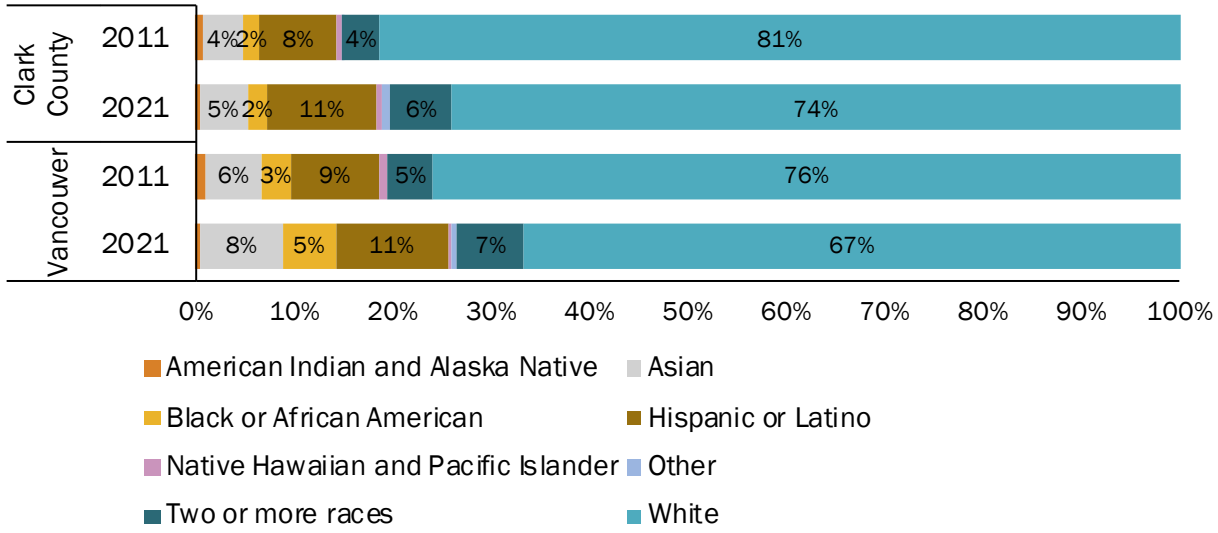


Exhibit 9 below shows the change in the distribution of students by race and ethnicity from the 2012–13 and 2022–23 school years in the Evergreen and

[6] The US Census Bureau collects race data based on self-identification. The racial categories included in the census questionnaire generally reflect a social definition of race recognized in this country, recognizing racial and national origin or sociocultural groups. People may choose to report more than one race to indicate their racial mixture. People who identify their origin as Hispanic, Latino, or Spanish may be of any race and the concept of race is separate from the concept of Hispanic origin. The race categories include White; Black or African American; American Indian or Alaska Native; Asian; Native Hawaiian or Other Pacific Islander; some other race. Source.

Vancouver School Districts. While White students continue to make up the majority of students in both school districts, the share of students who are Black, Indigenous, and people of color (BIPOC) has increased. This change mirrors that of the overall Vancouver population, which also showed a decrease in the White population alongside an increase in communities of color.

Exhibit 9: Change in race and ethnicity distribution, Evergreen and Vancouver School District, 2012–13 and 2022–23

Source: Washington Office of Superintendent Public Instruction (OSPI), 2012–13, 2022–23

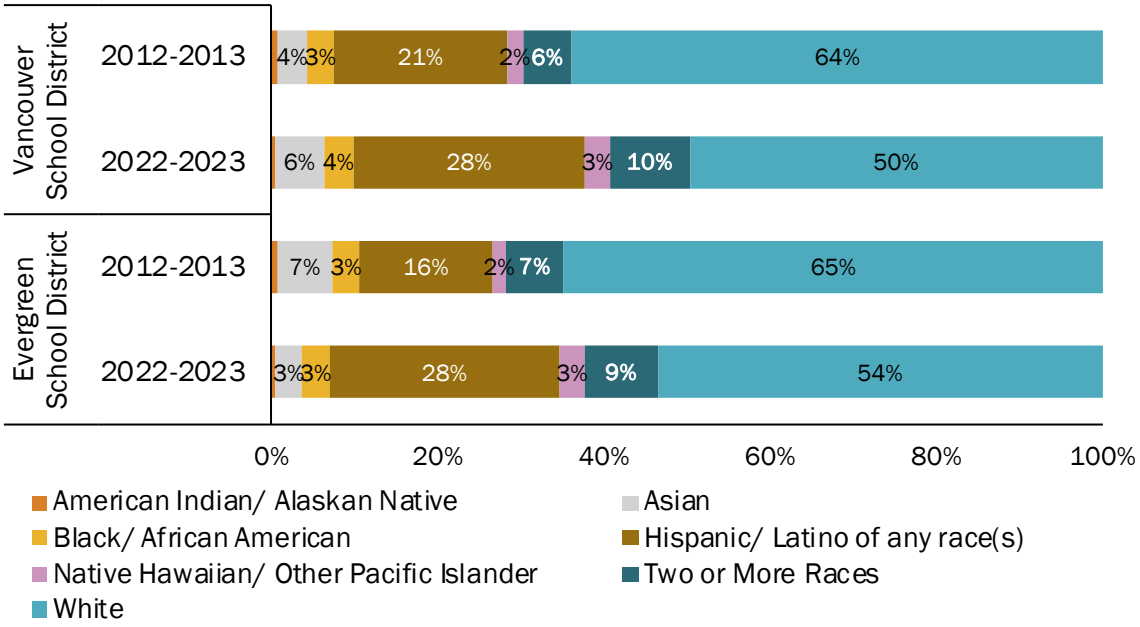
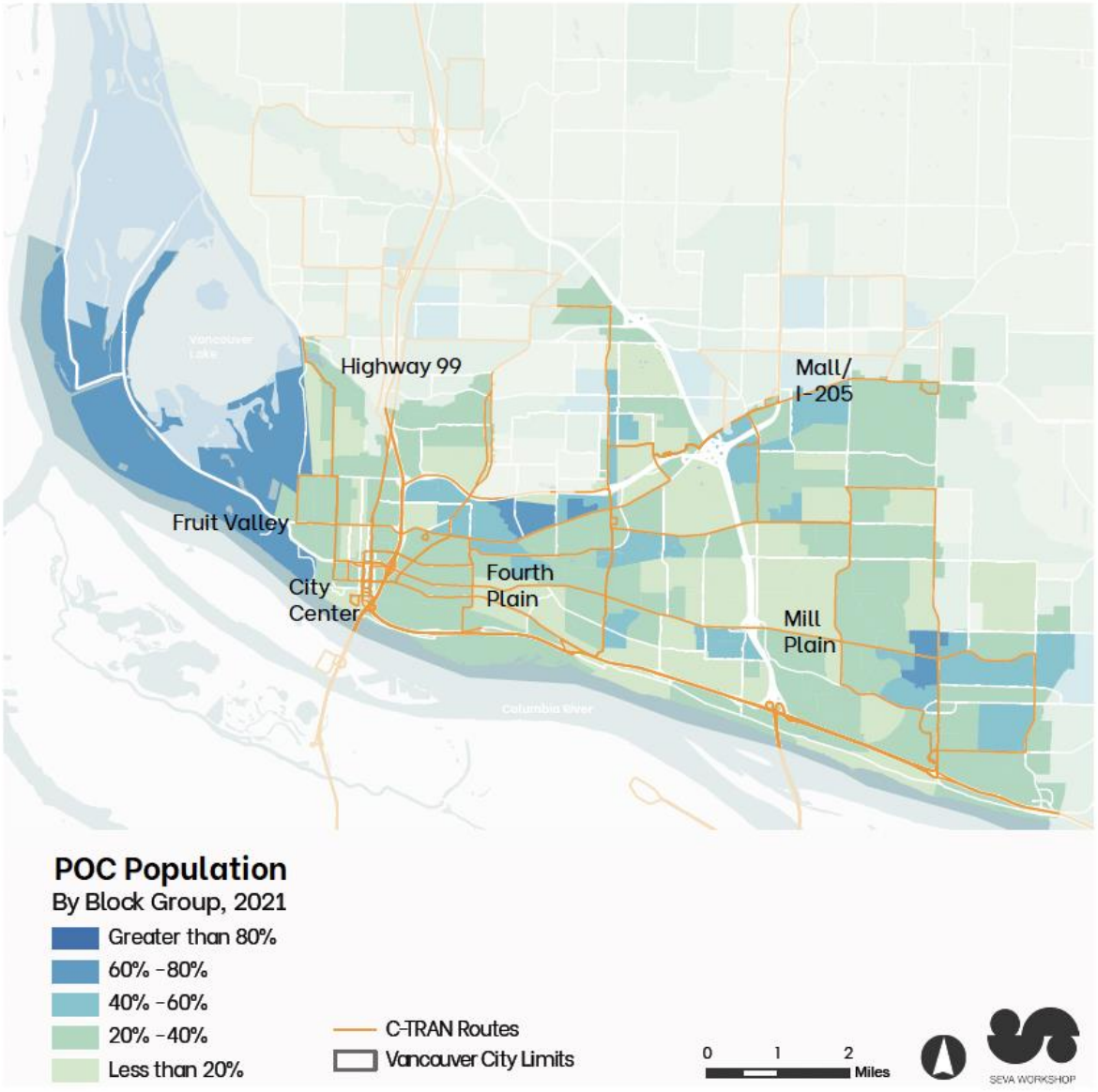


Exhibit 10 shows a map of where communities of color live throughout Vancouver. Larger shares of communities of color, with at least 40% of communities of color, are located in the Fruit Valley area, in the Fourth Plain area (northern edge), near the Vancouver Mall/I-205 area, a small area near Mill Plain, and in areas located on the eastern edge of the city.

Exhibit 10: Map of persons of color (POC) population by block group in Vancouver, 2021
Source: SEVA, ACS 5-Year estimates 2017–2021.



Source: American Community Survey 5 year estimates 2017-2021

Income distribution

Income is an important determinant of housing choice, influencing both the type of housing a household chooses (e.g., single-family detached, duplex, or a larger multifamily property) and whether a household rents or owns their housing. Key findings include:

- Vancouver has a median household income of $70,000, which is lower than Clark County. Comparatively, Vancouver has a higher share of households earning less than $75,000 and a lower share of households earning more than $100,000 annually.
- Vancouver median household incomes are lower than the Portland-Vancouver-Hillsboro MSA HUD area median income (AMI) levels for both 2021 and 2023 (family of four). Compared to the larger region, Vancouver has a higher share of households earning below 60% of the AMI.

Median household income

As of 2021, the median household income in the City of Vancouver was nearly $70,000 per year. The city's median household income is roughly $14,000 lower than that of both Clark County and the state. Exhibit 12 shows the change in median household incomes from 2011 to 2021. Both Vancouver and the County saw increases in median household income, with Vancouver's median household income increasing roughly by around $11,000 per year.

Exhibit 11: Median household incomes, Vancouver and Clark County, 2021
Source: ACS 1-Year Data Tables, Table S1901, 2021

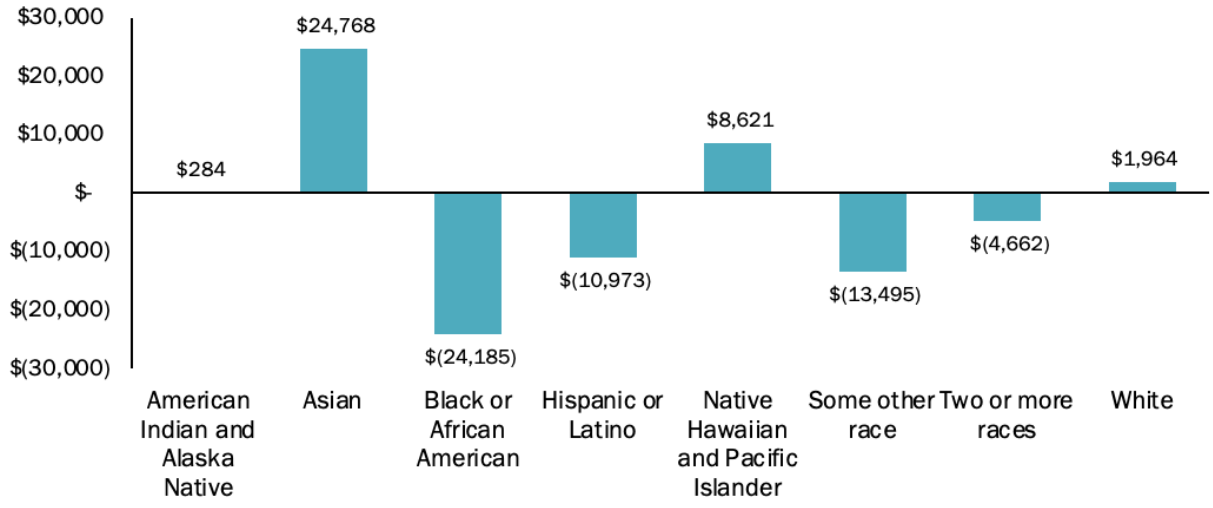
$70,000	$84,000	$97,000	$79,000	$84,000
City of Vancouver	Clark County	City of Hillsboro	City of Portland	State of Washington

Exhibit 12: Change in median household incomes, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table S1901, 2011, 2021

	2011	2021	Change	Percent Change
City of Vancouver	$58,918	$69,993	$11,075	19%
Clark County	$68,250	$83,837	$15,587	23%
City of Hillsboro	$79,219	$97,436	$18,217	23%
City of Portland	$56,658	$79,057	$22,399	40%
State of Washington	$68,466	$84,247	$15,781	23%

Exhibit 13 shows differences in median income by race/ethnicity when compared with Vancouver's overall median. Asian and Native Hawaiian and Pacific Islander households, on average, earn above the median income. White households and American Indian and Alaskan Native households, on average, earn close to the overall city median. Black or African American, Hispanic/Latino, multiracial, and other race households all earn, on average, below the city median.

Exhibit 13: Median income by race compared to overall median
Source: SEVA, ACS 5-year estimates 2017–2021



Household income distribution

Exhibit 14 shows the distribution of different income brackets in Vancouver and comparison geographies. Of these jurisdictions, Vancouver has the highest share

of households earning below $25,000 (18%) annually, as well as the highest share earning below $75,000 per year (53%). Looking at the higher income brackets, fewer Vancouver households earn more than $100,000 annually than any of the comparison jurisdictions.

Exhibit 14: Median household income distribution, Vancouver and comparison geographies, 2021
Source: ACS 1-Year Data Tables, Table S1901, 2021

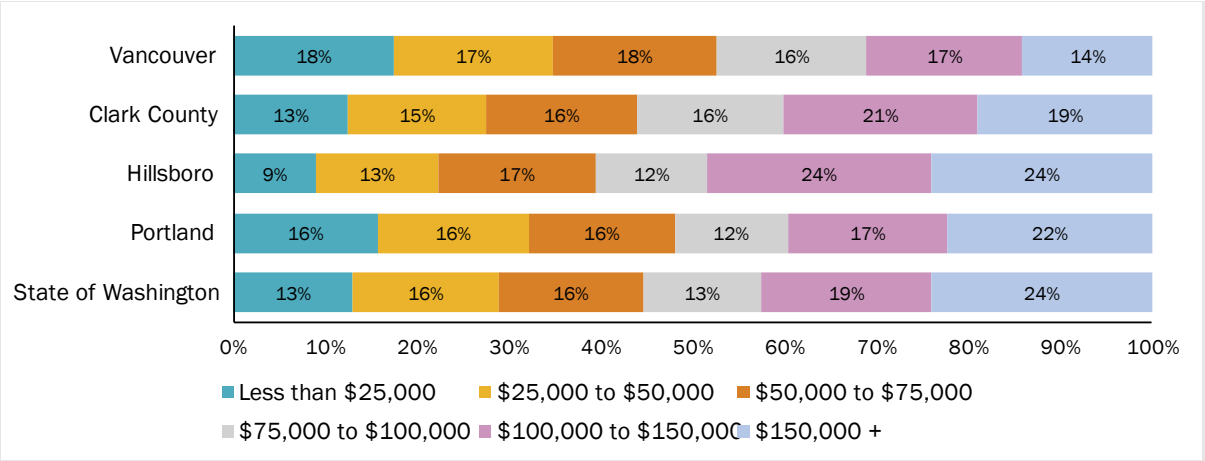
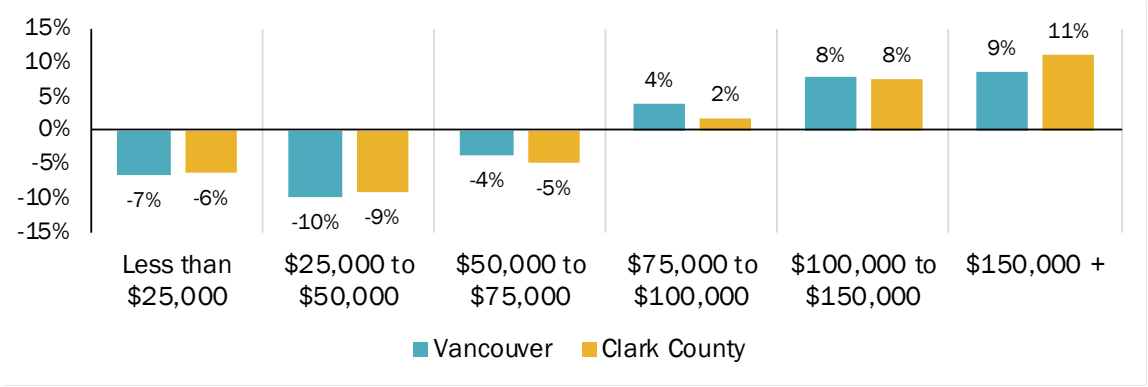


Exhibit 15 shows the change in the *share* of each income bracket from 2011 to 2021. The share of households earning more than $150,000 annually increased from 5% to 14% in Vancouver over that time period, an increase of nine percentage points (although slightly lower than the county's share). **In both Vancouver and Clark County, the share of households earning less than $75,000 annually decreased.** This could indicate that the city is gaining more people with household incomes earning above $75,000 per year or that existing households are experiencing increases in their incomes, or a combination of the two. In both the county and the city, the share of households earning between $25,000 and $50,000 decreased the most, while households earning more than $150,000 increased the most.

Exhibit 15: Change in median household income distribution, Vancouver and Clark County, 2011–2021

Source: ACS 1-Year Data Tables, Table S1901, 2011, 2021



Area median income (AMI)

Another aspect of analyzing household incomes is area median income. AMI is defined as the midpoint of a specific area's income distribution and is defined each year by the Department of Housing and Urban Development (HUD).[7] HUD includes Vancouver as part of the Portland-Vancouver-Hillsboro Metropolitan Statistical Area (MSA). In 2021, HUD determined the AMI to be $96,900 for a family of four in the area.

HUD uses AMI calculations to set income limits for affordable housing in different income categories, such as extremely low income (earning less than 30% of the AMI), low income (earning between 30% and 50% of the AMI), and moderate income (earning between 50% and 80% of the AMI). Income limits for a family of four in the region for 2011 are shown in

Exhibit 17, for 2021 in Exhibit 17, and for 2023 in Exhibit 18.

Exhibit 16: Income limits by HUD area median income, family of four, Portland-Vancouver-Hillsboro MSA, 2011

Source: HUD

$21,600	$36,000	$57,600	$72,000	$86,400
Extremely Low	Low	Moderate	Median	120% AMI

[7] AMI/ Median Family Income (MFI) looks at how much each income level can afford in housing costs which is helpful for understanding housing affordability. Each year, the HUD uses data from the U.S. Census to define an area's MFI based on family size. The MFI benchmark helps determine eligibility for HUD housing programs (often including rent-restricted housing) and supports the tracking of different housing needs for a range of household incomes. If the term AMI is used in an unqualified manor, this reference is synonymous with HUD's MFI.

(30% AMI)	(50% AMI)	(80% AMI)	(100% AMI)	

Exhibit 17: Income limits by HUD area median income, family of four, Portland-Vancouver-Hillsboro MSA, 2021

Source: HUD

$29,000	$48,350	$77,350	$96,900	$116,280
Extremely Low (30% AMI)	Low (50% AMI)	Moderate (80% AMI)	Median (100% AMI)	120% AMI

Exhibit 18: Income limits by HUD area median income, family of four, Portland-Vancouver-Hillsboro MSA, 2023

Source: HUD

$33,850	$56,400	$90,200	$114,400	$137,280
Extremely Low (30% AMI)	Low (50% AMI)	Moderate (80% AMI)	Median (100% AMI)	120% AMI

Exhibit 19 (below) shows how the Portland-Vancouver-Hillsboro AMI compares to the median household income for Vancouver and other nearby cities. Vancouver's annual median household income was $69,993 in 2021 which is almost $27,000 less than the 2021 HUD 100% AMI of $96,900.

The AMI for four and one-person households is higher than actual median income in the City of Vancouver. This could have implications for housing affordability for households with four or fewer people. If affordability thresholds are set higher than actual incomes in Vancouver, lower to moderate income households may not be able to find suitably affordable housing.

Exhibit 19: Area median incomes compared to median household incomes by family size, Vancouver and nearby cities, 2021

Source: HUD, ACS 1-Year Data Tables, Table S901, 2021.

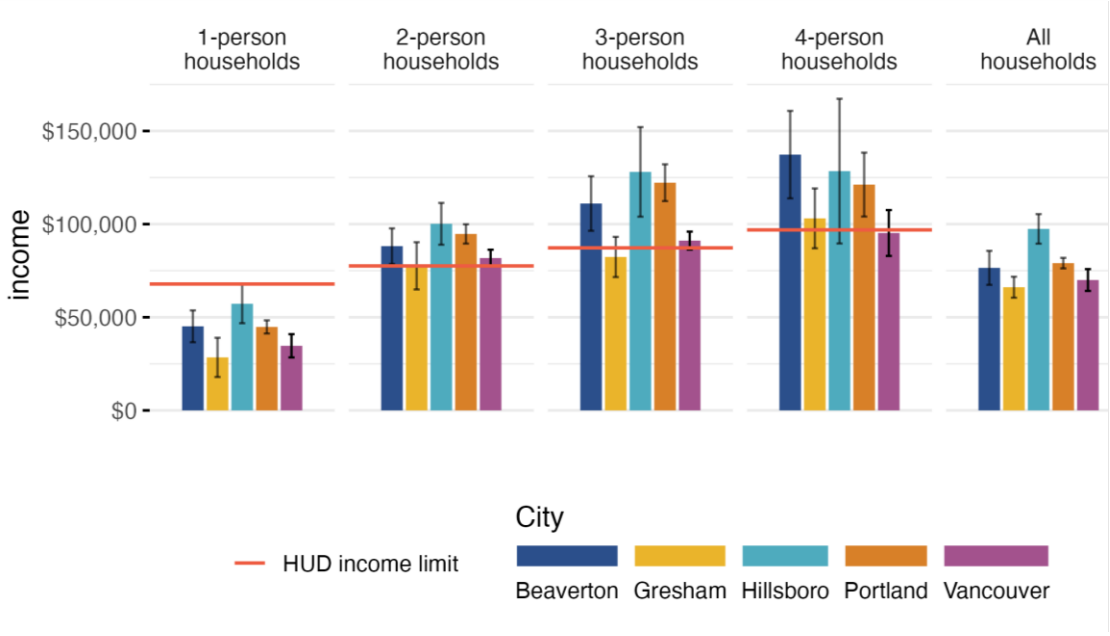
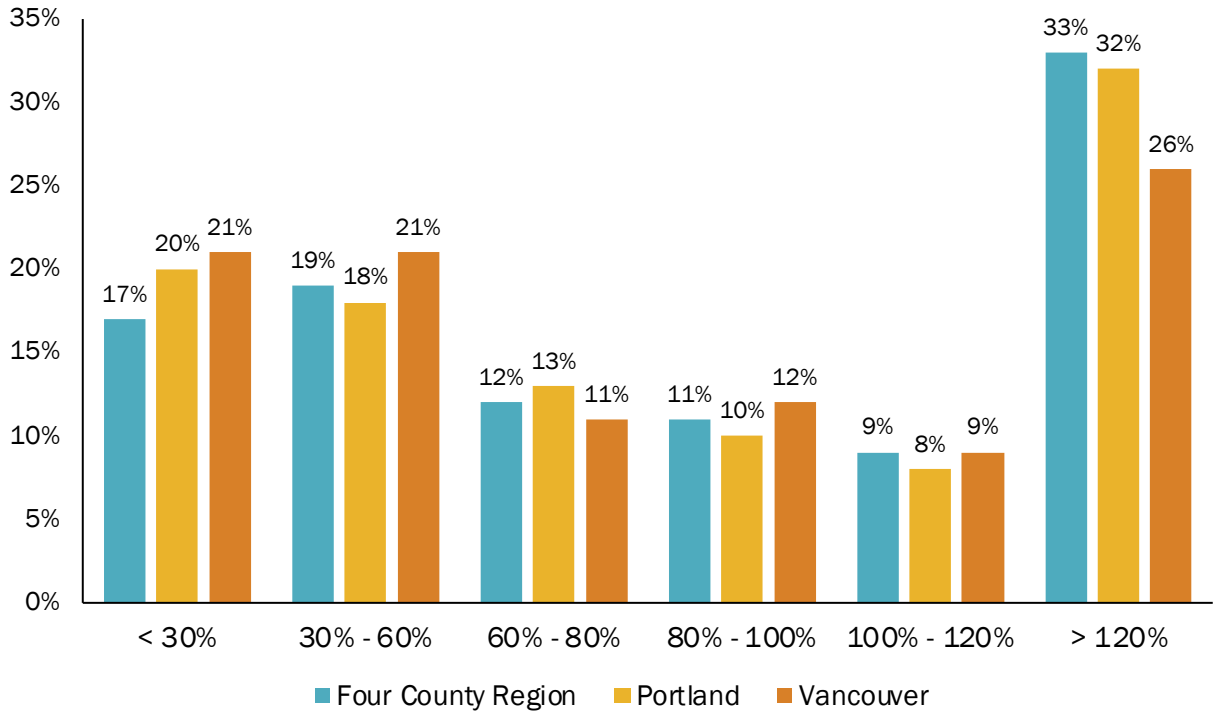


Exhibit 20 shows where households in Vancouver, Portland, and the four-county region (including Multnomah, Clackamas, Washington, and Clark counties) fall within these income limits. While the largest income bracket for each region is households earning more than 120% of the AMI, Vancouver has a smaller share of these households (6 percentage points lower than Portland and seven percentage points lower than the four-county region).

For all three areas, the second and third largest income brackets are extremely low-income households earning less than 30% and low-income households earning between 30 and 60% of the AMI. For both lower income brackets, Vancouver has a slightly higher share of households than Portland or the four-county region.

Exhibit 20: Household income as a percent of area median income, Vancouver, Portland, and four-county region, 2021
Source: HUD



Household characteristics

Household characteristics, such as whether a household owns their home, average household size, and household living arrangement trends, can highlight a city's changing housing needs. Key findings include:

- Roughly half (52%) of Vancouver households own their homes, a lower rate than the county overall (65%). In comparison, the United States average is 65%, and Washington's state average is 64%. In contrast, larger cities like Hillsboro, OR, Portland, OR, and Seattle, WA, all have lower homeownership rates (50%, 53%, and 44%, respectively). Additionally, the average age of Vancouver homeowners has increased in the past decade, which could indicate barriers to homeownership for younger residents.
- Factors like household size can impact preferences for unit types and tenure as larger households typically need larger units. In general, single-family homes (either detached or attached) tend to offer more square footage compared with multifamily units. In Vancouver, 88% of owner households lived in single-family detached homes in 2021, as well as 93% in Clark County overall. In comparison, the largest share (51%) of renter households in

Vancouver lived in larger multifamily buildings with five or more units and an additional 18% in 'plex' units (including duplexes, triplexes, and quadplexes). The same trend was true in Clark County with 44% of renters living in multifamily buildings and 16% in 'plex' units.

- The average size of Vancouver households decreased slightly from 2011 to 2021, corresponding with an increase in the share of one- and two-person households and a decrease in the share of three- and four-person households. At the same time, the number of households with children in Vancouver decreased by 7%.
- White and Asian households tend to be smaller than other households for both renters and homeowners in the City of Vancouver. Of homeowner households, Hispanic households had the largest households with 3.7 members and for renters, "other" race households are the largest with 3.5 members.
- Asian and White households had the highest homeownership rates and were the only households with an ownership rate higher than the renter rate (71% and 53%, respectively). Hispanic and multiracial households had the lowest homeownership rates (29% and 26%, respectively).
- There has been an increase in the share of households with unrelated individuals and couples without children. Unrelated households include individual householders, unmarried partners, roommates, seniors living alone or with a roommate, or other shared living arrangements. In contrast, the share of households with children are on the decline, which is further reflected in the change in average household size, which has also been decreasing.

Household tenure

Household tenure refers to whether a household rents or owns their home. Just over half (52%) of Vancouver households own their homes, which is a lower homeownership rate than Clark County (65%) and the state but similar to other nearby cities. From 2011 to 2021, the homeownership rate rose by roughly one percentage point in Vancouver. The homeownership rate remained stable in Clark County overall.

Exhibit 21: Homeownership rate, Vancouver and comparison geographies, 2011–2021
Source: ACS 1-Year Data Tables, Table B25003, 2021

	2011	2021	Change in Percentage Points
City of Vancouver	51%	52%	1%
Clark County	65%	65%	0%
City of Hillsboro	53%	50%	-3%
City of Portland	51%	53%	2%
State of Washington	63%	64%	1%

Tenure by age

Exhibit 22 shows the distribution of homeowners by age in Vancouver and Clark County. In general, Vancouver has a higher share of older homeowners than the county overall, with 51% of homeowners over 60 years (compared to 42% of county homeowners). In addition, only 30% of Vancouver homeowners are between the ages of 35 and 54, compared to 38% of county homeowners. This could indicate that there is a lower share of the prime working age population living in the city compared to elsewhere in the county.

Exhibit 22: Distribution of homeowners by age, Vancouver and Clark County, 2021
Source: ACS 1-Year Data Tables, Table B25007, 2021

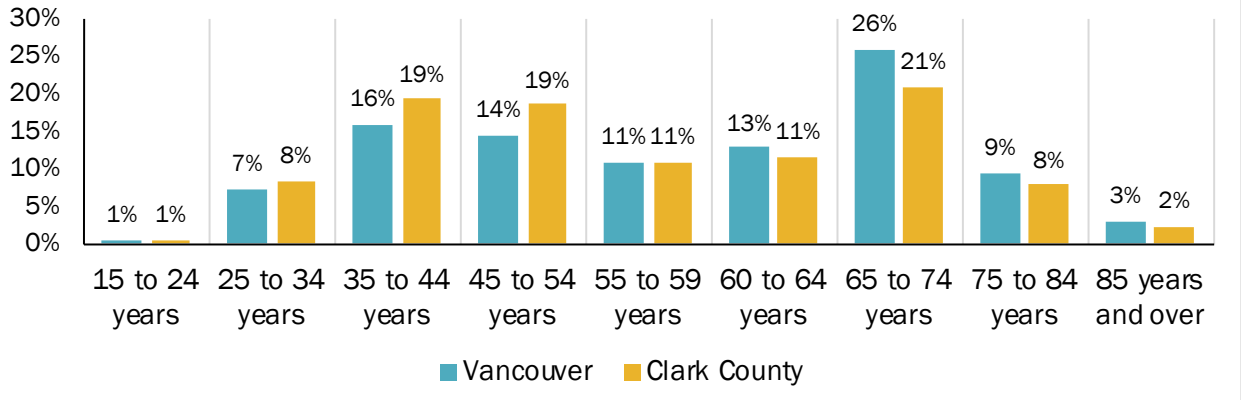
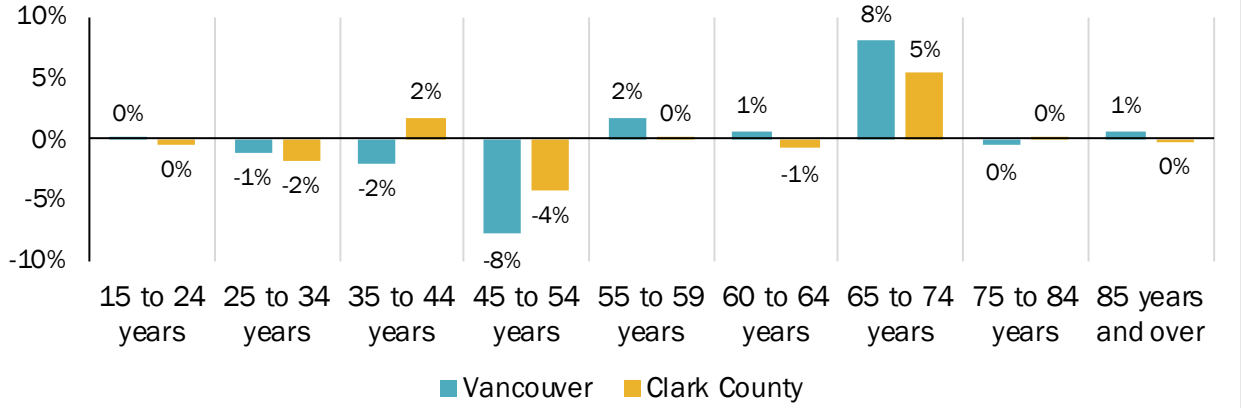


Exhibit 23 shows the change in the *share* of each homeowner age group from 2011 to 2021. Over that time period, the share of Vancouver homeowners aged 45 to 54 years dropped 8%, while the share of Vancouver homeowners aged 65 to 74 years increased 8%. While these trends are similarly reflected at the county level, the county experienced smaller levels of change over the same time period

compared to the City of Vancouver. This could indicate that homeownership is increasingly becoming out of reach for younger homeowners. Homeownership opportunities have become more limited, particularly for younger households, possibly due to the need for higher incomes and more equity to keep pace with increasing housing costs.

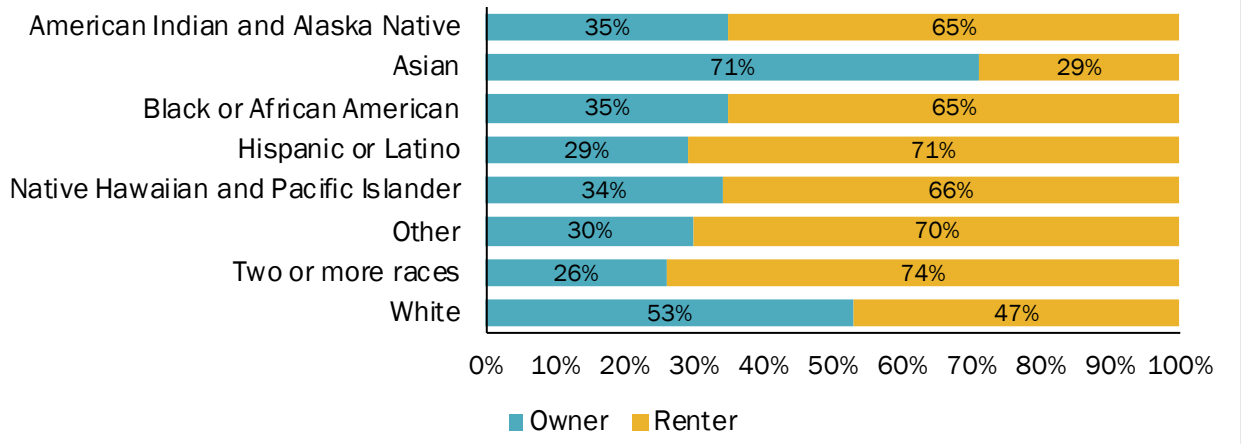
Exhibit 23: Change in distribution of homeowners by age, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table B25007, 2011, 2021



Tenure by race

Exhibit 24 shows household tenure by race in Vancouver. Asian and White households have the highest homeownership rate, with 71% and 53% of households respectively. Multiracial and Hispanic or Latino households have the lowest homeownership rate, at 26% and 29% of households respectively.

Exhibit 24: Household tenure by race and ethnicity, Vancouver, 2021
Source: SEVA, ACS 5-Year Estimates, 2017–2021



Household size

Household size is an important indicator for the types of housing needed in a region. Smaller households, such as younger or older adults, may prefer living in middle or multifamily housing types given their smaller size and relative affordability, while larger households with children or extended families cohabitating may be more comfortable in larger single-family dwellings or multifamily residences with multiple bedrooms. Vancouver's average household size is roughly 2.3 members, slightly lower than the county overall (2.6 persons).

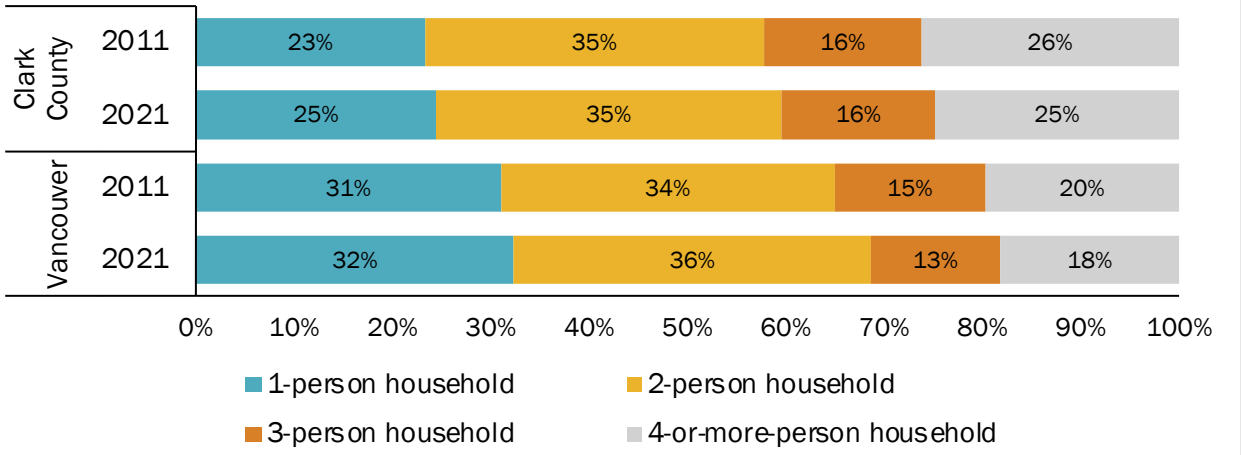
Exhibit 27 shows the change in average household size from 2011 to 2021. For both jurisdictions, the average household size decreased by roughly 0.1 household members. Given the decrease in residents under 20 years during the same time period in both areas, the decrease in household size could be due to an increase in the share of households without children.

Exhibit 25: Change in average household size, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table S2501, 2011, 2021

	2011	2021	Percent Change
City of Vancouver	2.4 persons	2.3 persons	-3.0%
Clark County	2.7 persons	2.6 persons	-2.3%

Household size distribution has remained relatively consistent in the county from 2011 to 2021. In Vancouver, the share of three- and four-person households each decreased by two percentage points; at the same time, the share of two-person households increased by two percentage points and the share of one-person households increased by one percentage point. Given this information, it is possible that the shift in household sizes in the city reflects older couples becoming empty nesters, an influx of younger households without children, or (most likely) both.

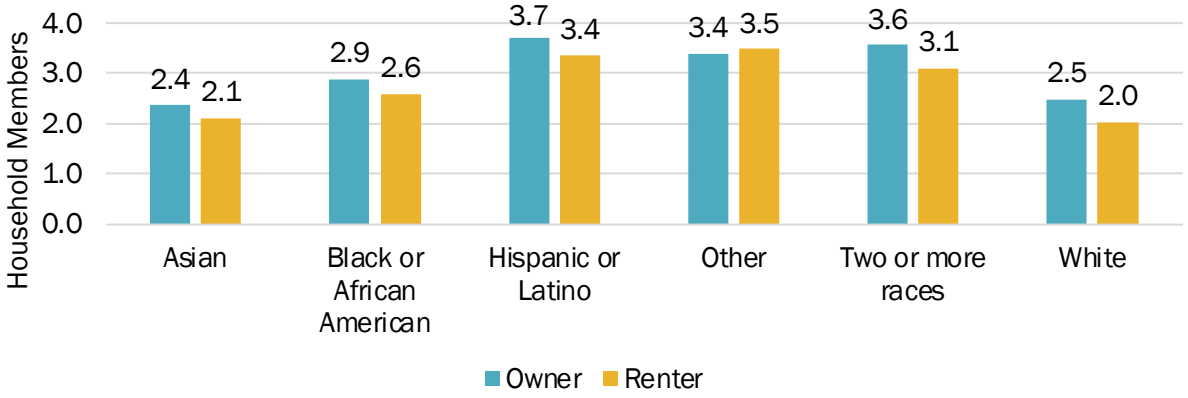
Exhibit 26: Change in household size distribution, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table S2501, 2011, 2021



Household size by race

Exhibit 27 shows average household sizes by race and ethnicity in Vancouver. Of homeowner households, Hispanic households had the largest average household size with 3.7 members. On average, Asian and White homeowner households are the smallest, with roughly 2.4 and 2.5 members, respectively. Of renter households, Asian and White households are again the smallest on average, with 2.1 and 2.0 members respectively, and "other" race households are the largest on average with 3.5 members.

Exhibit 27: Average household size by race and ethnicity, Vancouver, 2022
Source: ACS 1-Year Data Tables, Table B25010A-H, 2022. Note: Data not available for American Indian and Alaska Native households or Native Hawaiian and Other Pacific Islander households.

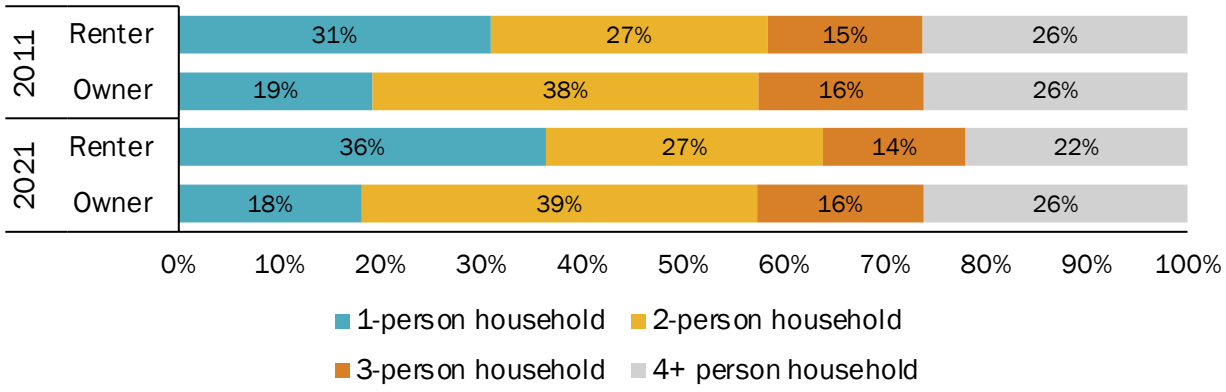


Household size by tenure

Exhibit 28 shows household size by tenure. As of 2021, renter households tend to be slightly smaller than owner households. Roughly twice as many renters live in

one-person households than homeowners (36% to 18%, respectively). On the other hand, 39% of homeowners live in two-person households compared to 27% of renters. From 2011 to 2021, the distribution of household sizes for owner households remained relatively stable. For renter households, the share of one person households increased by five percentage points, and the share of households with more than four members decreased by four percentage points. This could indicate an increasing size gap between ownership households, which tend to be larger, and renter households, which have decreased in average size.

Exhibit 28: Household size by tenure, Vancouver, 2011–2021
Source: ACS 1-Year Data Tables, Table B25009, 2011-2021



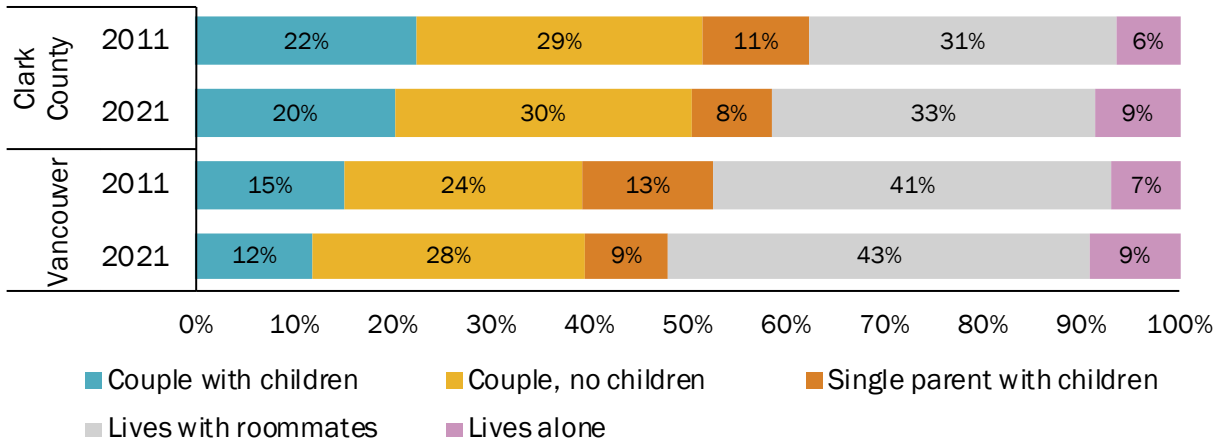
Living arrangement

As of 2021, Vancouver has a higher share of residents living with roommates than the county (43 to 33%, respectively). In both jurisdictions, the share of residents living with roommates (non-family households) increased by two percentage points.

Compared to the county, Vancouver has an eight-percentage-point lower share of couples with children, and a two-percentage-point lower share of couples without children. Overall, 21% of Vancouver households have children, compared to 28% of Clark County households. From 2011, the share of households with children decreased by seven percentage points in the city and five percentage points in the county.

Exhibit 29: Change in living arrangement, Vancouver and Clark County, 2011–2021

Source: ACS 1-Year Data Tables, Table S1101, 2011, 2021



Section 3. Housing market conditions and trends

Current housing stock

Key findings include:

Housing Mix

Vancouver has a higher share of multi-unit housing than the county overall, with slightly under half (around 44%) of Vancouver housing units having multiple units. However, the dominant type of housing is still single-detached housing (at 56%).

- **The dominant type of housing is single-detached housing comprising over half the housing stock both in Vancouver and Clark County as a whole (in terms of the total number of housing units).** However, Vancouver has a lower share of single-detached housing (at 56%) compared to the county's 72%. The remaining housing stock in Vancouver includes an estimated 27% multifamily housing, 8% single family attached (including townhomes or row homes), and 18% "plex housing" which is attached units up to fourplexes (according to U.S. Census data, 2021).
- **Vancouver has a higher share of multifamily housing than the county overall, with over a third (around 37%) of Vancouver residences having more than one unit.** Permit data analysis shows a steady increase in multifamily development in recent years. However, this percentage remains lower than that of the City of Portland (40%). Larger cities typically have higher percentages of multifamily housing units to try and keep up with the demand for housing that is less present in smaller or more rural areas.
- **Vancouver has seen a recent spike in vacancy rates among two-bedroom units in multifamily housing, jumping from just under 4% in 2022 to almost double that at 7% in 2023 that likely is related to recent housing construction.** Housing market assessments often use a 5% standard vacancy rate that implies a balance between housing supply and demand. Vancouver multifamily vacancy rates closely follow those of Clark County, only slightly falling behind as of 2023, ending at 7% to Clark County's 8%.

Housing mix

The U.S. Census provides generalized survey-based information describing the main categories of housing units, including single-family detached, single-family

attached ("plex housing" (includes up to four units including duplex/triplex/quadplex housing, townhomes and row homes), "plex housing" (including duplexes, triplexes, and quadplexes), and multifamily (indicating larger buildings of five or more units). As shown in Exhibit 30, just over half (56%) of Vancouver housing units are single detached homes and just over a quarter (27%) of units are in a multifamily development with five or more units. Roughly 18% of units are either single-family attached units or "plex housing." Vancouver generally has a similar housing mix as Portland and Hillsboro; compared to the county overall, Vancouver has a higher share of single-family attached, "plex", and larger multifamily housing.

Exhibit 30: Housing mix, Vancouver and comparison geographies, 2021
Source: ACS 1-Year Data Tables, Table B25024, 2021

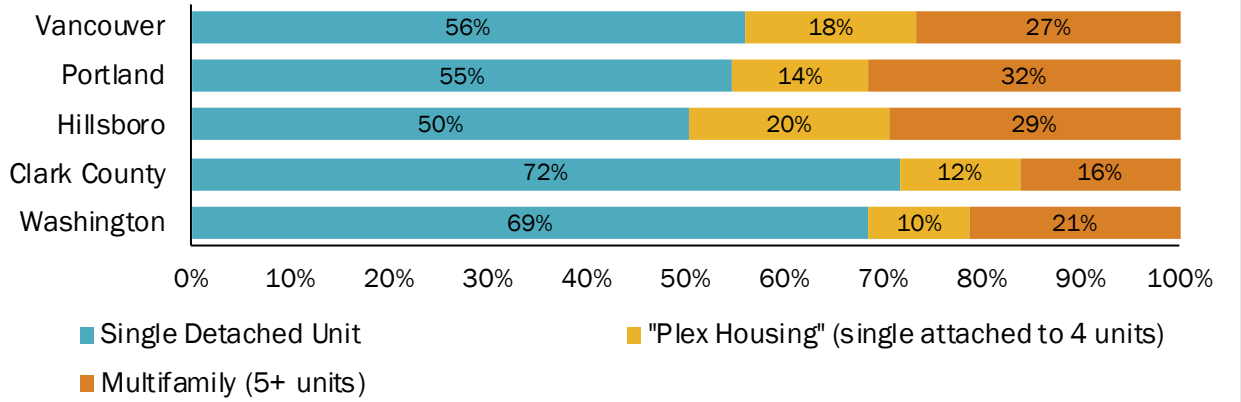
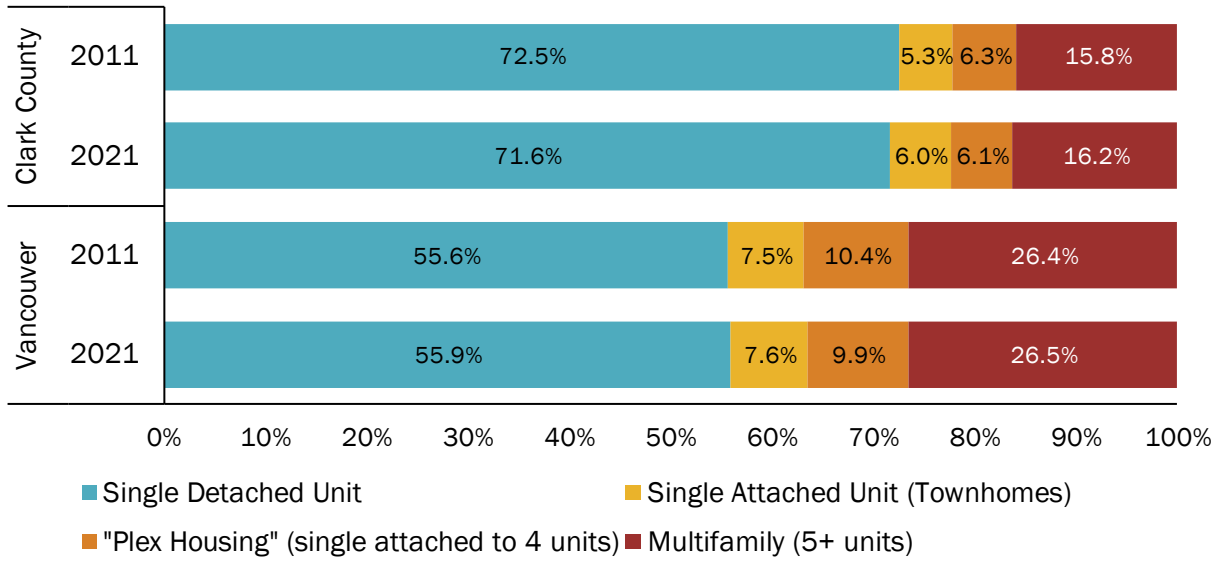


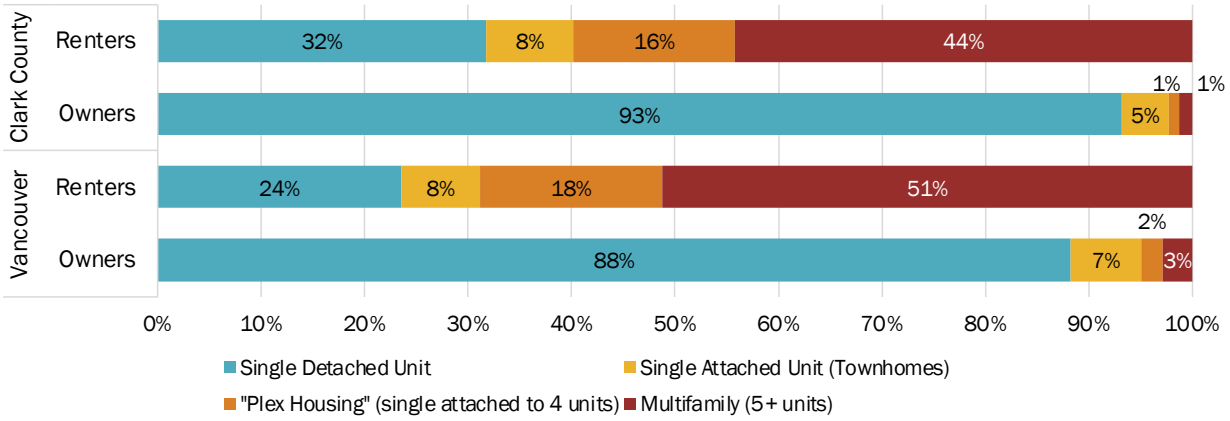
Exhibit 31 shows the change in the share of each housing type for Vancouver and the county from 2011 to 2021. According to the U.S. Census Bureau, there was only a slight change in the distribution of housing types over that time period. This general estimate provides the share of housing unit types based on information obtained from a survey sample obtained over one year (2011, 2021) including a subset of residents in the respective areas.

Exhibit 31: Housing mix, Vancouver and Clark County, 2011–2021
Source: ACS 1-Year Data Tables, Table B25024, 2011, 2021



Housing tenure varies for some housing types in both Vancouver and Clark County. In 2021, the majority of owner households in both Vancouver and Clark County lived in single-family homes (88% and 93% respectively). Likewise, the largest share of renter households lived in multifamily buildings with five units or more in Vancouver (51%) and Clark County (44%).

Exhibit 32: Housing mix by tenure, Vancouver and Clark County, 2021
Source: ACS 1-Year Data Tables, Table B25024, 2011, 2021



Vacancy

The Census defines vacancy as "unoccupied housing units considered vacant." Vacancy status is determined by how the unit would likely be occupied (e.g., for rent, for sale, or for seasonal use only). Vacancy rates are cyclical and represent

the lag between demand and the market's response to demand for additional dwelling units. Vacancy rates for rental and multifamily units are typically higher than those for owner-occupied and single-family dwelling units. In Vancouver, the vacancy rate for all units reported by ACS data was 5%, slightly higher than Clark County (4%). The city's overall vacancy rate has remained stable since 2011.

Exhibit 33: Vacancy rate, all units, Vancouver and Clark County, 2011 and 2021
Source: ACS 1-Year Data Tables, Table B25002, 2011, 2021

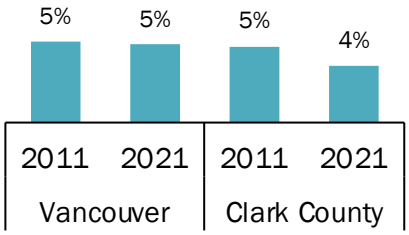
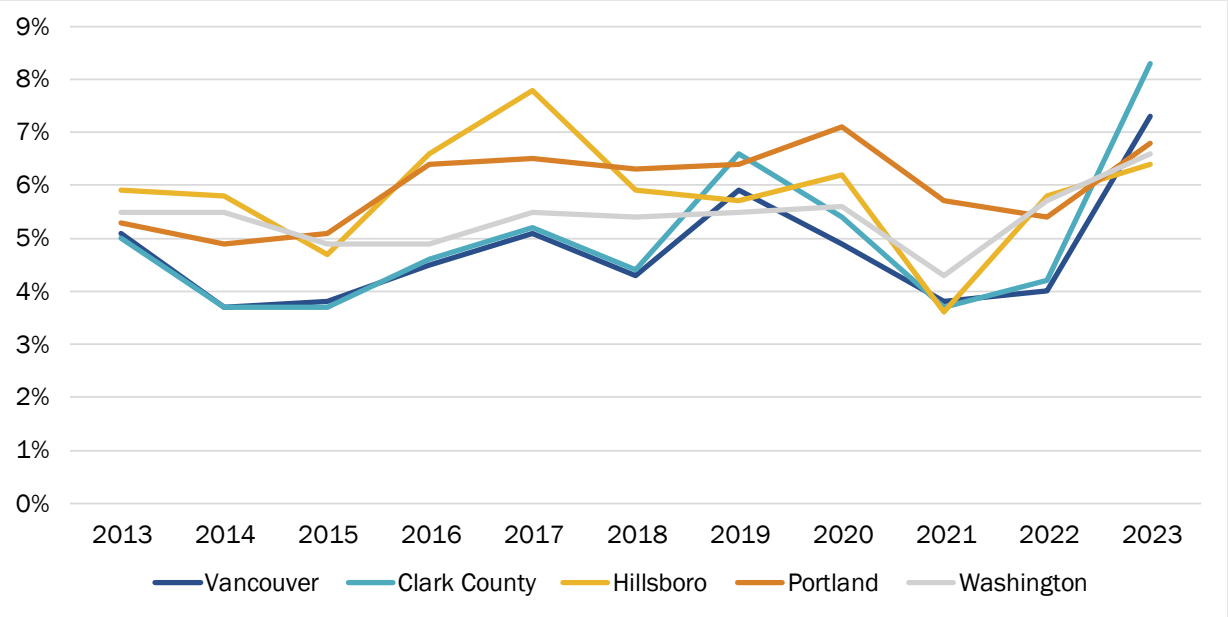


Exhibit 34 shows the two-bedroom multifamily vacancy rate for Vancouver, Clark County, Hillsboro, Portland, and Washington State according to CoStar. Clark County and Vancouver's vacancy rates closely follow each other for two-bedroom units, and until recently have been below the state average. As of 2023, Vancouver and Clark County's vacancy rates for two-bedroom multifamily units have almost doubled, from 4 to 7 and 8%, respectively (higher than the overall vacancy rate for all units reported in ACS data). In comparison, the state of Washington's vacancy rates for two-bedroom multifamily units increased by less than one percentage point in the last year. A low vacancy rate can indicate limited housing supply with inadequate production to satisfy need, while a high vacancy rate can indicate that housing costs are too high. Housing market assessments often use a 5% standard vacancy rate that implies a balance between housing supply and demand.

Exhibit 34: Two-bedroom multifamily units vacancy rate, Vancouver, Clark County, Hillsboro, Portland, and Washington State, 2013-2023

Source: CoStar



Housing development trends

Key findings include:

- **Historic and current housing underproduction has limited housing supply in both the City of Vancouver and Clark County.** Housing underproduction occurs when communities fall short in providing sufficiently available housing that meets the community's demand for housing. Essentially, there is a housing supply and demand imbalance that can persist over time to exacerbate housing access issues.
- **From 2012 to 2022, Vancouver increased its housing stock by roughly 14,700 units, or by 21% (a small portion of this increase was due to annexations). Annually, the City of Vancouver housing stock increased by around 1,466 housing units per year from 2012 to 2022. Rising housing costs and low vacancy rates suggest current housing stock and development is not adequately meeting the needs of Vancouver residents.**
- **Among the multifamily buildings permitted since 2015, the majority of units (73%) are in buildings with more than 20 units.** Alternatively, 23% are within buildings that have between five and 19 units, and only 4% are within buildings that have two to four units, suggesting an opportunity to build more middle housing and lower density multifamily housing in the city.

Housing unit supply changes

Exhibit 35 shows the housing growth for Vancouver and Clark County from 2012 to 2022. For this analysis a few other comparable cities in Washington State similar in size and scale are included to provide comparisons to the City of Vancouver. Both the City of Vancouver and Clark County showed a high growth rate, exceeding the growth rate of both the Cities of Spokane and Tacoma, which both grew at less than half the rate of Vancouver within the same time period. This helps demonstrate how rapid Vancouver's growth has been over the last decade.

Exhibit 35: Total housing units, Vancouver and Clark County, 2012–2022
Source: WA Office of Financial Management

	2012	2022	Change	Percent Change
City of Vancouver	70,853	85,511	14,658	21%
Clark County	169,992	203,749	33,757	20%
City of Spokane	94,911	101,222	6,311	7%
City of Tacoma	86,434	93,323	6,889	8%

Housing production

Since the 1960s, the U.S. has created about 1.10 housing units for every household that has formed. Households form when people move into a new area, when children leave their parents' homes, or when roommates come together or split up. A functioning housing market needs to produce at least one new housing unit for each new household formed. However, this should be higher due to the need to factor in demolition, second homes, vacation homes, changing consumer preferences, the need for a natural amount of vacancy rate that allows for movement within the market and accounts for the deterioration of existing housing stock. A ratio higher than 1:1, allows for a rate to account for a natural amount of vacancy, as well as for second homes and obsolescence. In

2022, Washington State had only 1.07 housing units for every household, which is lower than the national ratio of 1.11 housing units per household.[8]

Exhibit 36 shows the ratio of housing units to households by county in Washington State in 2023. The ratio in Clark County was only 1.05 in 2023.[9] This rate is much lower than the target rate of 1.11 housing units for every household.

Exhibit 36: Ratio of housing units to households, 2023
Source: Office of Financial Management, ECOnorthwest

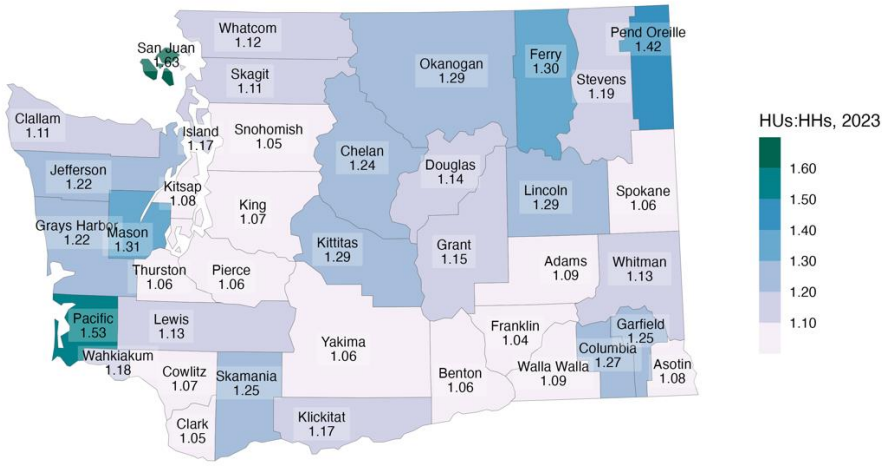
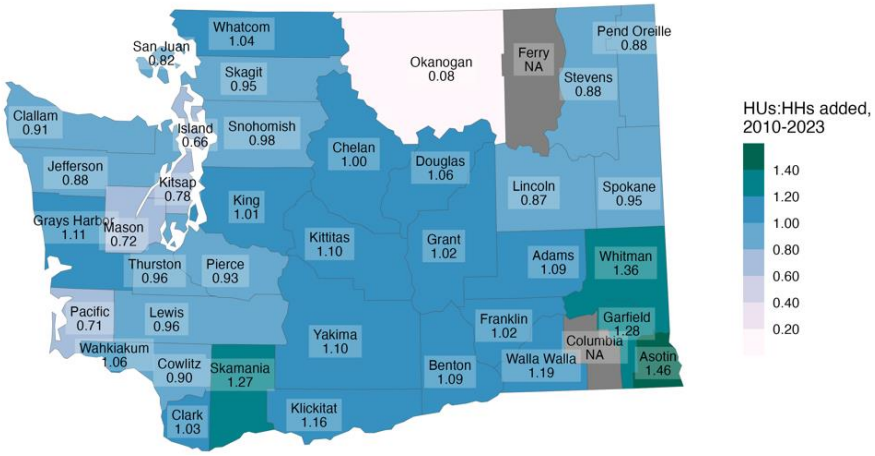


Exhibit 37 shows the ratio of housing units to households from 2010 to 2020. Over this time period, Clark County produced less housing compared to household growth than most counties in the State, contributing to rising housing costs in the city and county.

Exhibit 37: Ratio of housing units to households from 2010 to 2023
Source: Office of Financial Management, ECOnorthwest

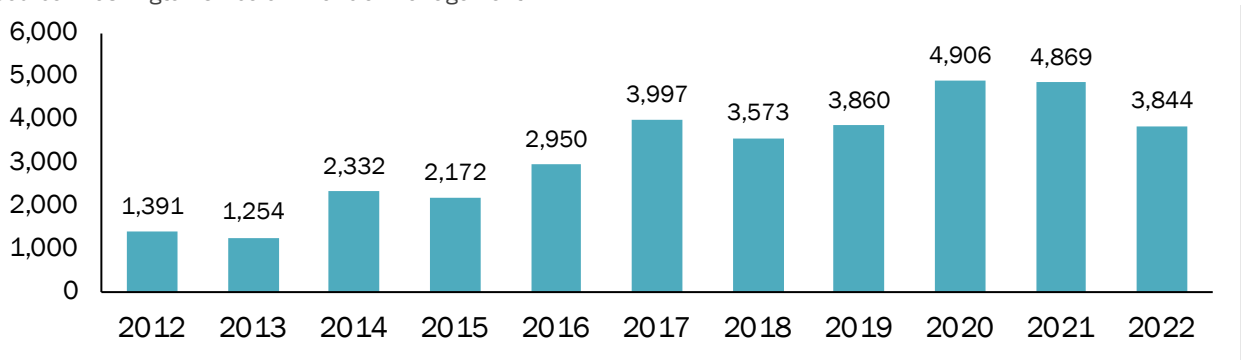


[8] Up for Growth. (2022). Housing Underproduction in Washington State. Source: https://upforgrowth.org/wp-content/uploads/2022/12/Housing-Underproduction-in-Washington-State.pdf

[9] Up for Growth Research on Housing Underproduction in Washington State, ECOnorthwest analysis of data was based on U.S. Census Bureau, Washington Office of Financial Management (OFM) and Moody's Analytics data sources.

Exhibit 38 shows the number of all types of housing units added to Clark County's housing stock each year from 2012 to 2022. Until 2021, the number of units added generally increased each year. However, this trend reversed in 2022 when roughly 1,000 fewer units were built in Clark County than in 2021.

Exhibit 38: Annual housing production, Clark County, 2012–2022
Source: Washington Office of Financial Management



Housing permit data

The project team also examined the City's building permit data from 2015 to 2021 to better understand emerging housing development trends providing more information on housing being permitted (not necessarily built already) and greater detail than available in the U.S. Census Bureau data. Below, Exhibit 39 shows multifamily permitting trends by building scale. Vancouver is seeing a steady increase in the annual rate of new units permitted in multifamily development across all scales of buildings. Approximately 79% of new unit construction in the city has been in multifamily developments over the last three years. This information differs from the general estimate provided above since the U.S. Census Bureau data shown above does not provide information on permitted housing construction and is based on a survey sample obtained over one year from a subset of residents.

In 2015, only 585 multifamily units were permitted, whereas 1,606 were permitted in 2021. Over that time period, the most commonly permitted multifamily building scale was 20- to 49-unit buildings (32% of permitted units), followed closely by 100+ unit buildings (28%), then five- to 19-unit buildings (23%). Only 4% of the permitted units were in two- to four-unit buildings, which could suggest an opportunity to expand middle housing development in the city.

Exhibit 39: Vancouver multifamily permit data by building scale, 2015–2021

Source: City of Vancouver. Number of units is shown below in the key.

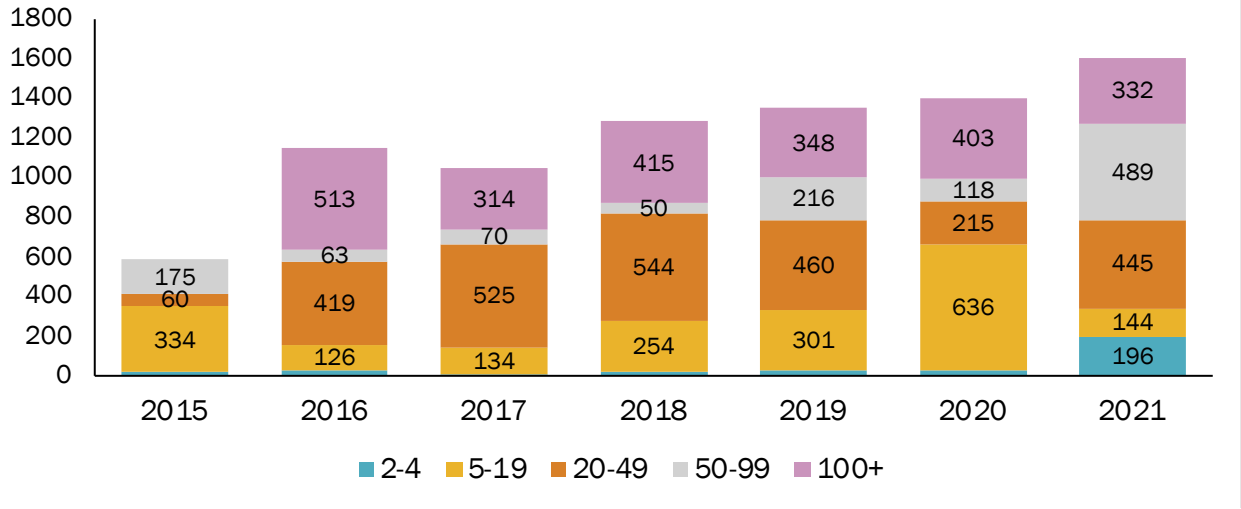
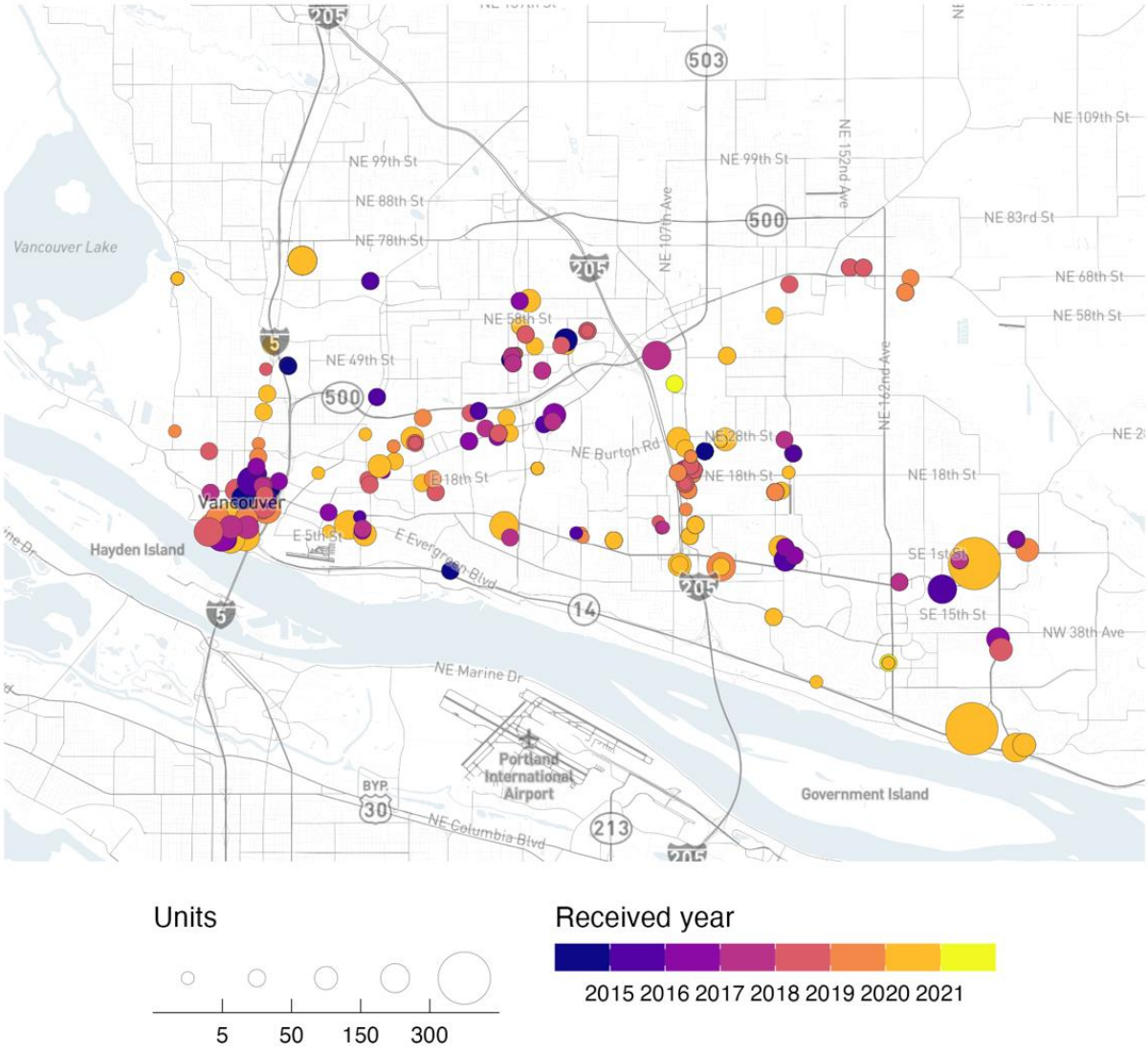


Exhibit 40 (below) provides the geographic location of the permits described above in Exhibit 39 by year received and the number of units in the building. Most apartment construction has been concentrated in the downtown area, with some clusters of multifamily development along the Fourth Plain Boulevard and near I-205.

Exhibit 40: Map of Vancouver multifamily permitting activity, 2015–2021
Source: City of Vancouver, ECOnorthwest



Housing market trends

Housing market cost data can provide insights into the attainability of existing housing stock in a city. Key findings include:

- As of 2023, the average rent in both Vancouver and Clark County is roughly $1,700. Rents in Vancouver have increased 60% over the past decade.
- As of 2023, the average home price in Vancouver is roughly $447,000. Home prices have nearly tripled over the past decade, increasing by 174%.

- Median household income in the City of Vancouver increased by 19% from 2011 and 2021 (when adjusted for inflation) which is far less than the increases in median home sales prices and average. In comparison, area median income calculated by the United States Department of Housing and Urban Development (HUD) for the Portland-Vancouver-Hillsboro metropolitan statistical area (MSA) for a four-person household rose from $72,000 in 2011 to $96,900 in 2021. Adjusted to 2021 dollars, this equates to a 12% increase in the same period for the Portland-Vancouver-Hillsboro MSA (indicating comparatively faster growth in the City of Vancouver).

Rental housing

Exhibit 41 shows the average rents across all housing unit sizes in Vancouver and comparison geographies for 2012 and 2023. Rents in the City of Vancouver are very similar to the county overall.

As of 2023, the average rent in Vancouver was $1,673 which was similar to the average rent of $1,671 in Clark County. From 2012 to 2023, Vancouver rents increased $603, or 56%, surpassing rents in Portland.

Exhibit 41: Average rents, Vancouver and comparison geographies, 2012–2023
Source: CoStar

Geography	2012	2023	$ Change	% Change
City of Vancouver	$1,070	$1,673	$603	56%
Clark County	$1,086	$1,671	$585	54%
City of Hillsboro	$1,104	$1,782	$678	61%
City of Portland	$1,198	$1,490	$292	24%

Ownership housing

As of June 2023, the median home sale price in Vancouver is roughly $477,000. The city's home prices are roughly $50,000 lower than the county overall.

Exhibit 42: Median home sales prices, Vancouver and Clark County, June 2023
Source: Redfin

$477,000	$527,000	$514,000	$511,000
City of Vancouver	Clark County	City of Hillsboro	City of Portland

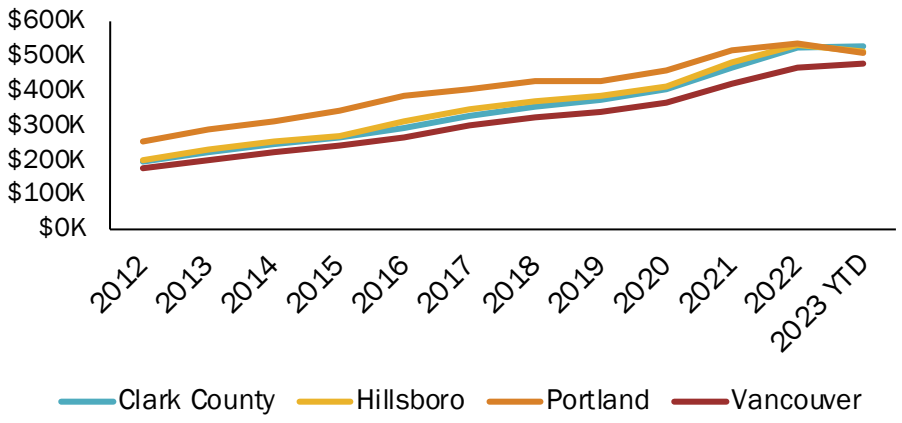
While Vancouver home prices are lower than the county, its home prices increased at a similar rate since 2012, nearly tripling (a 174% increase) over the decade from 2012 to 2023. Additionally, while Vancouver home prices are currently lower than both Hillsboro and Portland, Vancouver prices have increased at a faster rate than both cities.

Exhibit 43: Median home sales prices, Vancouver and Clark County, 2012–June 2023
Source: Redfin

Geography	2012	June 2023	$ Change	% Change
City of Vancouver	$174,000	$477,000	$303,000	174%
Clark County	$193,000	$527,000	$334,000	172%
City of Hillsboro	$198,000	$514,000	$316,000	159%
City of Portland	$253,000	$511,000	$258,000	101%

Additionally, while home prices in other jurisdictions dropped from 2022 to 2023, the City of Vancouver and Clark County home prices continued to grow, indicating a strong demand relative to other areas in the region.

Exhibit 44: Median home sales price, Vancouver and Clark County, 2019–June 2023
Source: Redfin



Section 4. Housing affordability

Cost burdened households

Housing costs are typically the largest portion of a household budget, and typically include mortgage or rent payment, utilities, interest, and insurance. HUD guidelines indicate that households paying more than 30% of their income on housing experience "cost burden" and households paying more than 50% experience "severe cost burden." Using cost burden as an indicator is one method of determining how well a city is meeting its need to provide housing that is affordable to all households in a community.

Cost Burden

Cost burdening tends to disproportionately impact renters in comparison to homeowners. Rates of cost burden for renters have increased since 2011 (by three percentage points) but dropped substantially for homeowners (12%).

Cost burdening for owner-occupied housing is less common because mortgage lenders typically ensure that a household can pay its debt obligations before providing a loan. However, cost burdening can occur when a household secures a mortgage and then sees its income decline. In addition, retired persons subsisting on a fixed income can experience cost burden associated with increased property taxes rising above their financial limitations.10

Key findings for Vancouver include:

- **Cost burdening tends to disproportionately impact renters in comparison to homeowners** and this tendency holds true for the City of Vancouver and Clark County as a whole. In the City of Vancouver, renters are nearly three times more likely to be cost burdened than homeowners. In 2021, 57% of renters in the city were cost burdened (spending more than 30% of their income on

[10] Also, it is important to note that households with incomes over 100 percent of the AMI are less burdened overall since their larger income, minus housing costs, will go farther to cover non-housing expenses such as transportation, childcare, and food. While cost burden is a common measure of housing affordability, it does have limitations. The measure does not consider the actual income and the possibility of higher incomes being able to easily pay for necessary nondiscretionary expenses with the remaining income, and it does not account for accumulated wealth and assets (such as profits from selling another house) that allow a household to purchase a house that would be considered unaffordable to them based on the cost-burden indicator.

rent), including over a quarter of all renters (27%) who were severely cost burdened, spending more than 50% of their income on rent and with around.

- **Rates of cost burden for renters have increased since 2011 (by three percentage points) but dropped substantially for homeowners (12%).**

Housing cost burden can put households with low incomes in vulnerable situations and force them to make trade-offs between housing costs and other essentials like food, medicine, or transportation. This unstable condition can also lead to rental evictions, job instability, school instability for children, and homelessness.

Exhibit 45: Overall cost burden, Vancouver and Clark County, 2021
Source: ACS 1-Year Data Tables, Table B25091, 2021

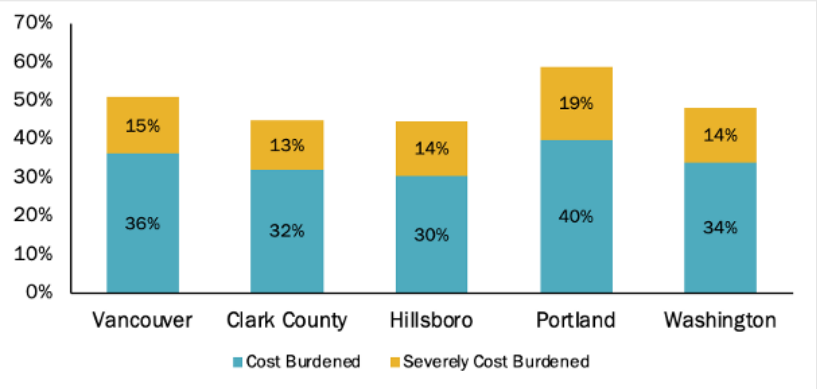


Exhibit 45 shows overall rates of cost burden for the City of Vancouver compared to Clark County, Hillsboro, Portland, and the State of Washington as a whole. In Vancouver, roughly 51% of all households experienced cost burdened, with 36% of households paying between 30-50% of their income towards housing and an additional 15% who experienced severe cost burdening (paying 50% or more of their income towards housing costs). These numbers are higher than Clark County, Hillsboro, and the State of Washington. The only area which showed higher rates of cost burdening was the City of Portland.

Exhibit 46 shows rates of cost burden trends by tenure, showing rates for homeowners and for renters, for the City of Vancouver, Clark County, Hillsboro, Portland, and the State of Washington in 2021. In all areas except for Portland, severely cost burdened owner households are under 10%. In addition, all areas show cost burdened owner households to be under 30%, with Vancouver having a rate of 20%.

In contrast, overall cost burden rates for renters are around 57% in the City of Vancouver, the highest among all comparison geographies, with Hillsboro and the state of Washington being the only geographies with cost burden rates under 50%. In all geographies, renters are significantly more likely to be cost burdened than homeowners, with the smallest gap being that of Hillsboro, where there was a 24 percentage point gap between renters and owners. In contrast, Vancouver has a 37 percentage point gap.

Exhibit 46: Cost burden by tenure, Vancouver and Clark County, 2021

Source: ACS 1-Year Data Tables, Table B25091, 2021

Note: 'Cost Burdened' indicates households paying 30-50% of income towards housing costs. 'Severely Cost Burdened' indicates households paying 50% or more of income towards housing costs.

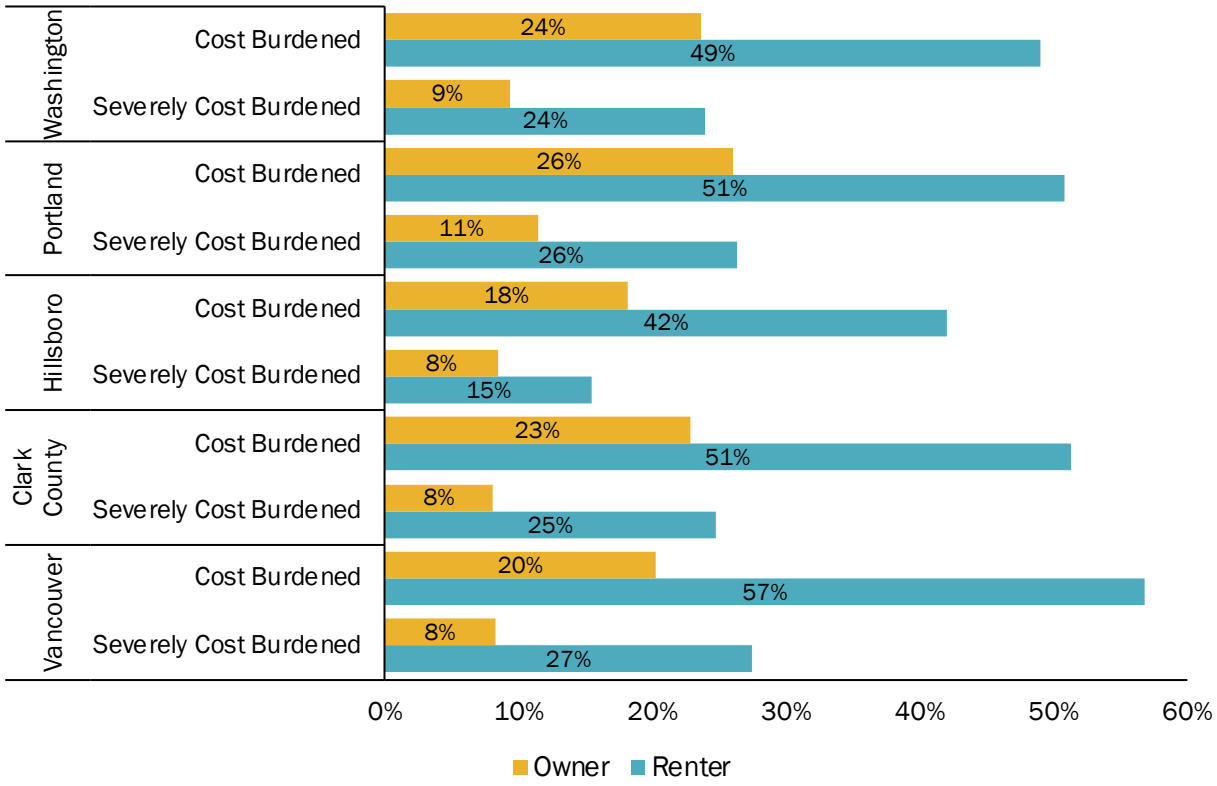
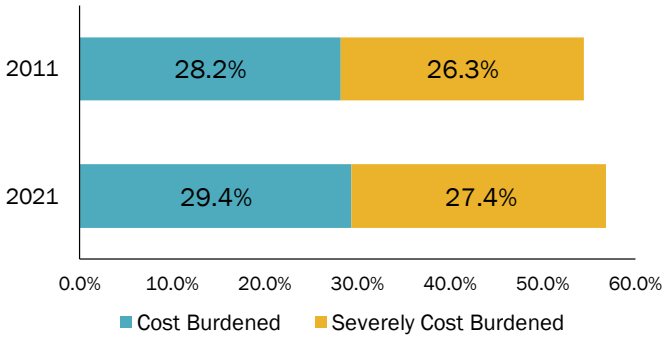


Exhibit 47 shows the increases in cost burdening for renters over the last decade in the City of Vancouver. As of 2021, 57% of renters spent over 30% of their household income on rent, and just over a quarter (27%) of renters spent more

than 50%. From 2011 to 2021, the rate of cost burdening increased by roughly three percentage points, while the rate of severe cost burdening increased by roughly one percentage point.

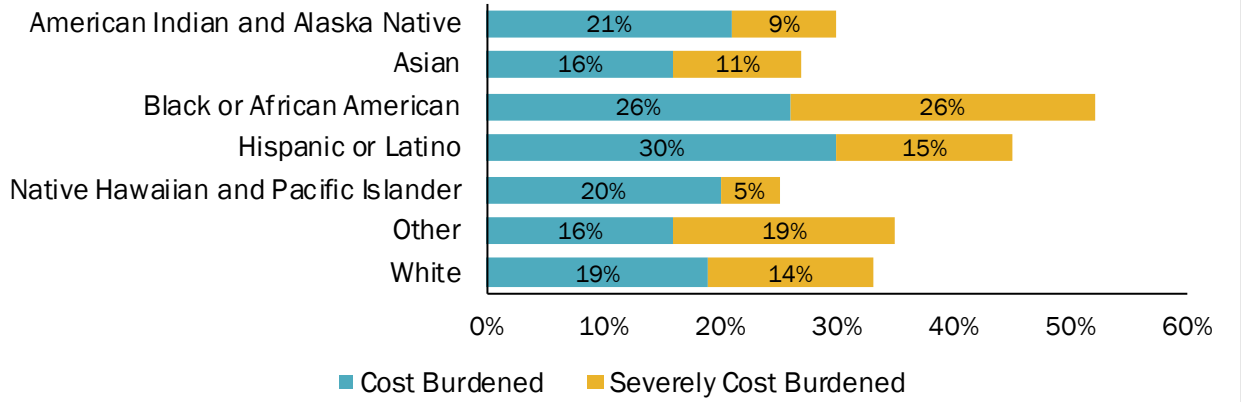
Exhibit 47: Cost burden rates for renters, Vancouver, 2011–2021
Source: ACS 1-Year Data Tables, Table B25091, 2011, 2021



Cost burden by race

Exhibit 48 shows the rates of cost burdening and severe cost burdening by race in Vancouver. In the city, Black or African American households and Hispanic or Latino households experience the highest rates of cost burden (where households pay 30% or more of their income towards housing costs). Households who identified as another race not listed ('Other') and Black or African American households had the highest rates of severe cost burden (paying 50% or more of income for housing).

Exhibit 48: Cost Burden by Race, Vancouver, 2021
Source: SEVA, American Community Survey 5-Year Data Tables, 2017–2021



Senior and affordable housing inventories

Exhibit 49 lists income restricted, project-based affordable housing sponsored by the City's Affordable Housing Fund. There are 1,243 units designated for various populations as specified below.

Exhibit 49: Affordable rental units in Vancouver, WA
Source: ECOnorthwest, Vancouver Affordable Housing Fund Units.
The "In Progress" status was added for units under construction.

Project	Units	Eligibility	Project Status
Meriwether Place	30	<30% AMI, homeless and referred by behavioral health services	Completed
The Meadows	22	Units for <30% AMI, <50% AMI	Completed
Isabella Court I	46	Seniors earning <60% AMI	Completed
Isabella Court II	49	Seniors earning <60% AMI	Completed
Skyline Crest Apartments	229	<50% AMI	Completed
Rhododendron Place	30	<30% AMI and clients of Columbia River Mental Health Services	Completed
Vista Court Senior	76	Seniors	Completed
Azalea Place Apartments	12	Disabilities	Completed
Fort Vancouver	131	<60% AMI	Completed
Laurel Manor	82	Seniors	In Progress
O-Street Tiny Homes	20	Homeless	In Progress
CRC Development (Phase I)	4	Homeless	Completed
CRC Development (Phase II)	19	Homeless	Completed
Johnson Village	9	Families	Completed
McKibbin Commons	4	Families	Completed
The Elwood	46	Homeless/Disabilities	Completed
The Pacific	18	Homeless	Completed
Recovery Home for Mothers	6	Families	In Progress

Project	Units	Eligibility	Project Status
Recovery Residence for Women	9	Families	Completed
Mercy PeaceHealth Family Housing	69	Families	Completed
Residences at Arnada	12	Families	Completed
12-Unit Acquisition	12	Families	In Progress
Neals Lane Acquisition	9	Families	Completed
Caples Terrace	28	Homeless Youth	Completed
Fourth Plain Commons	106	Families	Completed
Lainie's Crossing Acquisition	40	Families	Completed
Miles Terrace	69	Seniors	Completed
Namuqas	30	Homeless/Foster Youth	Completed
Northcrest Apartments Acquisition	26	Families	Completed

One of the major funding sources for affordable housing in Vancouver comes from the Affordable Housing Fund (AHF). This fund "supports people experiencing very low-income in Vancouver through providing affordable housing and services."[11] Established in 2016, this fund has produced 701 affordable housing units, awarding funds of almost $20 million to these projects between 2017 and 2023. This levy was recently renewed to provide $100 million in AHF funding from 2024 through 2033.[12]

[11] https://city-of-vancouver-wa-geo-hub-cityofvancouver.hub.arcgis.com/documents/CityOfVancouver::affordable-housing-fund-investment/explore

[12] https://www.cityofvancouver.us/economic-prosperity-and-housing/affordable-housing-fund/

The availability of housing for seniors (65 years or older) is important to track and assess to ensure the city has sufficient housing for the growing senior population. Exhibit 50 maps out different types of senior housing located in the City of Vancouver including adult family homes, assisted living facilities, and nursing homes.[13] Over the last decade, the share of the senior population (aged 65 years or older) has increased by six percentage points from 13% to 19% in the City of Vancouver. This likely will increase the demand for senior housing facilities.

Addressing housing needs for those aged above 60 will require a range of housing opportunities. For example, "the 82-to-86-year-old cohort dominates the assisted living and more intensive care sector" while new or near-retirees may prefer aging in place or active, age-targeted communities.[14] Characteristics like immigration and ethnicity play a role too as "older Asians and Hispanics are more likely than whites or blacks to live in multigenerational households."[15] Households for adults 65 years or older earn different incomes, thus they have to make distinctive housing choices. For instance, low-income households may not have the financial resources to live out their years in a nursing home and may instead choose to downsize to smaller, more affordable units. Others living nearby relatives may also choose to live in multigenerational households. The aging of the Baby Boomer generation could increase the demand for smaller "downsized" housing and greater demand for housing with assistance and age-in-place amenities.

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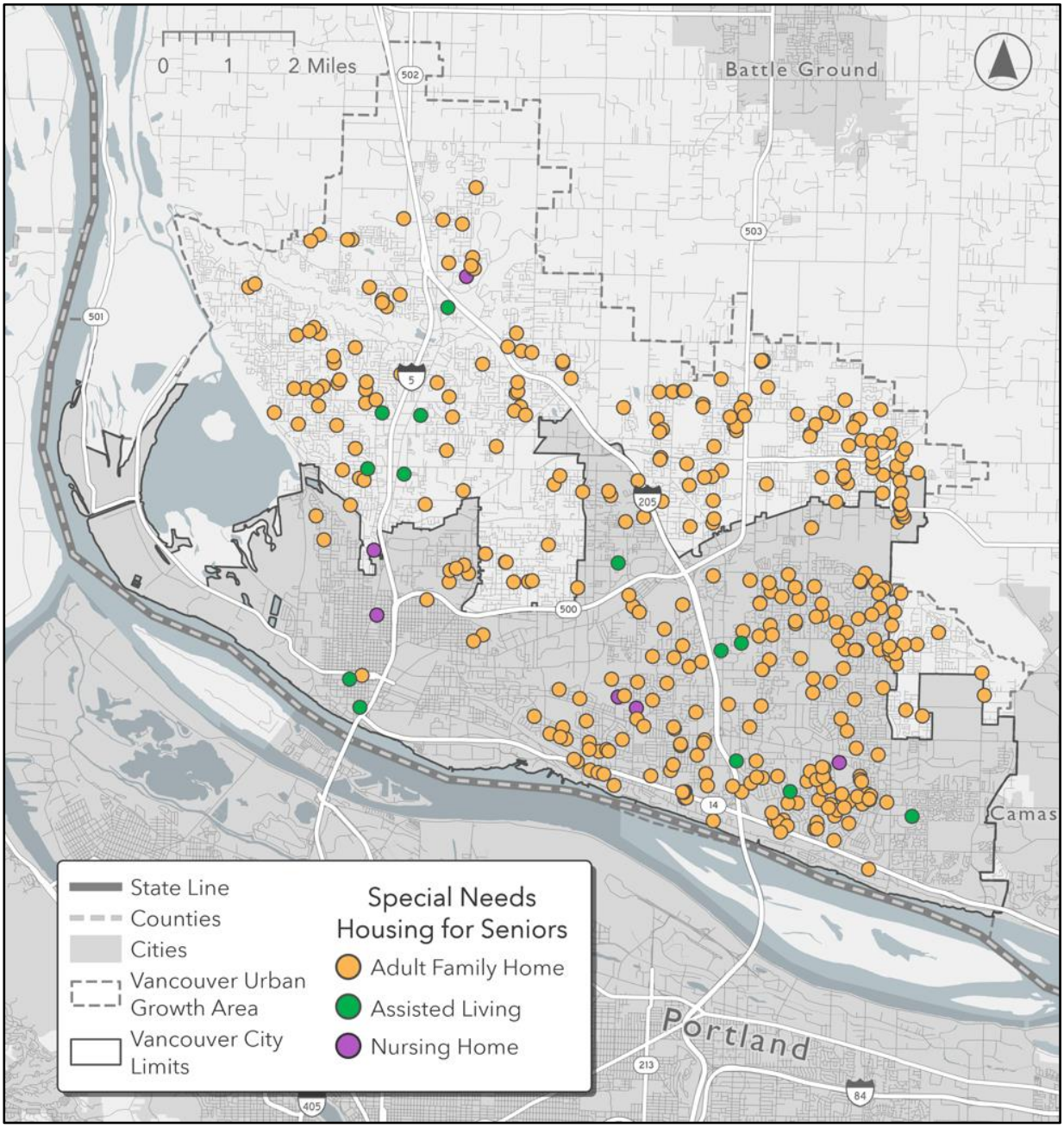
[13] An assisted living facility (ALF) provides room and board and help with activities of daily living. Some ALFs provide limited nursing services; others may specialize in serving people with mental health problems, developmental disabilities, or dementia (Alzheimer's disease). RCW 18-20-020(2). Some Assisted Living Facilities provide Assisted Living through a contract with the Department of Social and Health Services. Specific services are provided in a contracted assisted living facility. Adult family homes are regular neighborhood homes where staff assumes responsibility for the safety and well-being of an adult. A room, meals, laundry, supervision and varying levels of assistance with care are provided. Some provide occasional nursing care and/or specialized care for people with mental health issues, developmental disabilities or dementia. The home can have two to six residents and is licensed by the state. Source: Washington State Department of Health and Social Services: https://www.dshs.wa.gov/altsa/long-term-care-services-information

[14] Source: Urban Land Institute (2018). Emerging Trends in Real Estate, United States and Canada.

[15] Source: Herbert, Christopher and Hrabchak Molinsky (2015). Meeting the Housing Needs of an Aging Population. https://shelterforce.org/2015/05/30/meeting_the_housing_needs_of_an_aging_population/

Exhibit 50: Senior housing in Vancouver, WA

Source: ECOnorthwest, Washington State Department of Health and Social Services



Housing Type	Number of Facilities	Number of Beds
City of Vancouver		
Nursing Home	4	382
Assisted Living	8	724
Adult Family Home	184	1,092
Total	196	2,198
Vancouver Urban Growth Area (UGA)		
Nursing Home	2	209
Assisted Living	5	345
Adult Family Home	168	950
Total	175	1,504
Total (City and UGA)		
Nursing Home	6	591
Assisted Living	13	1,069
Adult Family Home	352	2,042
Total	371	3,702

Section 5. Current and future housing needs

Observed population growth in Vancouver has continued to exceed prior population forecasts. The 2011–2030 Vancouver Comprehensive Plan forecast an annual average population growth of 1.17% within city limits at that time[16] However, partially because of annexation, observed population growth over this period of time indicates that the average annual population growth since 2010 has actually been 1.68%, a large increase above planned growth.[17] This population growth has led to an increasingly strong demand for housing in the Vancouver market that shows no signs of slowing down in the near term, as Vancouver continues to capture a larger share of the Portland-Vancouver region population growth and residential development.

Housing Need

The City of Vancouver believes Clark County will continue to see strong growth in population. In total, an estimated 38,129 housing units are needed by 2045 in the City of Vancouver. Overall, this means an estimated 1,733 housing units need to be built or created per year from 2023 to 2045 to meet the housing need in the City of Vancouver.

Given that observed changes in population and household growth have exceeded the adopted forecast from the 2011–2030 Vancouver Comprehensive Plan, and that Clark County should make their decisions on population allocations in late 2024, this analysis uses a draft estimate of a potential refined housing need forecast based on current population estimates from the Washington Office of Financial Management (OFM).[18] Recently, the Clark County Council approved a 1.4% annual growth rate

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[16] https://www.cityofvancouver.us/sites/default/files/fileattachments/community_and_economic_development/page/874/vancouver_comprehensive_plan_2011-2030_august_2021_update.pdf. Between 2010 to 2020

[17] Although between 2010 to 2020, several areas were annexed into the City of Vancouver which increased the population by approximately 6,126 persons.

[18] The Washington State Department of Commerce (via HB 1220) has been developing method guidance for estimating housing need targets in total and by income level for counties that has been released recently in 2023. This new state requirement is a part of House Bill 1220 (2021) which amended the Growth Management Act to instruct local governments to "plan for and accommodate" housing affordable to all income levels. Clark County will have to

with a 20-year projected countywide population of 718,154 through 2045 which is nearly 20,000 more people than OFM's middle range projection (the OFM middle projection is 698,416 persons).[19]

The City of Vancouver believes Clark County will continue to see strong growth in population. The City determined that the associated demand for housing should be in line with the OFM middle forecast, which has historically been the most accurate forecast provided by the State. **The middle range OFM forecast estimates Clark County population increasing to 698,416 in 2045, indicating the need for an additional 107,193 housing units.**

Exhibit 51. City of Vancouver interim population and household forecast, 2023–2045

Source: Office of Financial Management Population Estimates, ECOnorthwest Analysis. AAGR: Average Annual Growth Rate.

Year	Population	Housing Units
2023	199,600	86,878
2045	281,544	125,007
Change 2024 to 2045		
Number	81,944	38,129
Percent	41%	44%
AAGR	1.87%	1.99%

The City believes it will continue to attract roughly the same share of county growth it has seen in the recent decade (42%). To estimate the City's housing

determine the allocation method for dividing up units for each jurisdiction and the method they will use to identify how much housing units by household income bracket should be allocated to each local jurisdiction in Clark County including the City of Vancouver. This analysis relies on the use of population projections over a period time such as 20 years or 30 years. The county must add the housing targets to their countywide planning policies. The county's allocation of housing needs to each local jurisdiction and the sum of housing needs to all jurisdictions should be documented in a public-facing summary document before the periodic Comprehensive Plan update. Vancouver's allocation of projected housing needs by income level, permanent supportive housing (PSH), and emergency housing (EH) must be documented in their comprehensive plan housing element. Definitions for PSH and EH are provided below. Additional information: https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/updating-gma-housing-elements/ and https://deptofcommerce.app.box.com/s/chqj8wk1esnnranyb3ewzgd4w0e5ve3a.

[19] Clark County Resolution No. 2023-05-03 adopted on May 2, 2023: https://clark.wa.gov/sites/default/files/media/document/2023-05/2023-05-03.pdf. The OFM 2045 population projections ranges from low 576,151 persons, middle 698,416 persons, and high 791,809 persons. Clark County's April 2022 population estimated by OFM is at 520,900 persons.

need through 2045, additional adjustments were made to account for smaller household sizes, higher vacancy rates due to the higher share of multifamily units, providing for the loss of units to second/vacation homes, and accounting for the demolition of some existing units.

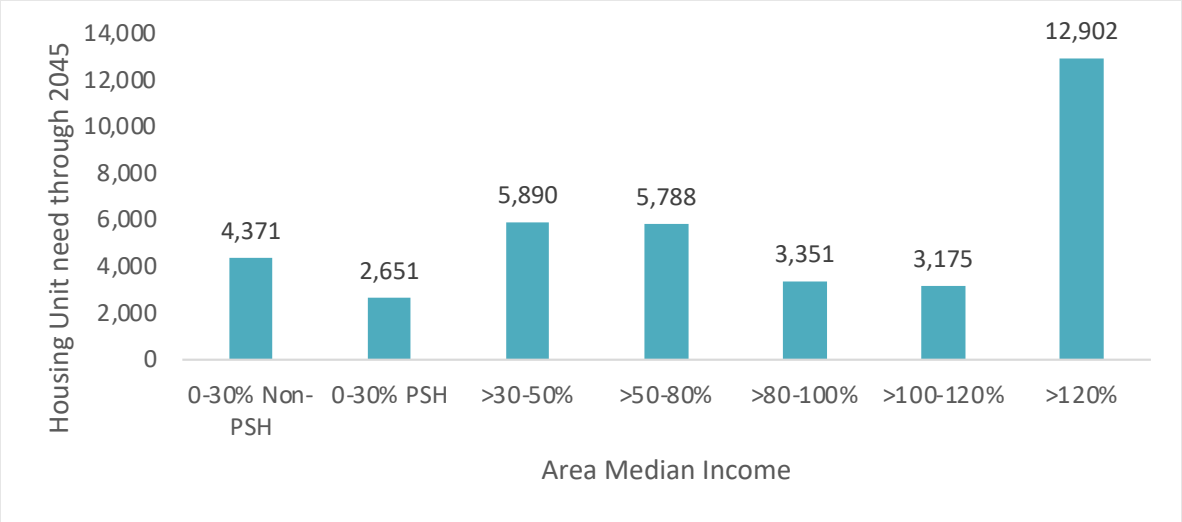
These adjustments indicate a total need of 43,198 housing units from 2020 to 2045 in the City of Vancouver. The Washington State Department of Commerce Housing for All Planning Tool (HAPT) is calibrated to 2020, therefore the project team subtracted 5,069 housing units built from 2020 to 2023 in the City. Overall, this indicates a total need of 38,129 housing units from 2023 to 2045 (the planning horizon is 2025 to 2045).[20] As shown in Exhibit 52 below, a total of 2,651 Permanent Supportive Housing (PSH) units and 4,371 non-PSH units for households below 30% AMI (extremely low income) may be needed by 2045 along with 5,890 units between 30 to 50% AMI and 5,788 housing units between 50 and 80% AMI (low income). In addition, around 3,351 units between 80 to 100% AMI (moderate income); 3,175 housing units between 100 to 120% AMI (moderate to middle income); and 12,902 housing units over 120% AMI (high income) may be needed by 2045. The precise number of housing units in the income bands needed in the City of Vancouver has not yet been determined. The HAPT estimate also shows 406 emergency living units (in the form of beds providing temporary housing) available and 1,374 beds needed by 2045.

Overall, an estimated 1,733 housing units should be built or created per year from 2023 to 2045 to meet the housing need in the City of Vancouver. Since the existing City of Vancouver housing stock has increased by around 1,466 housing units per year over the last decade from 2012 to 2022 (per OFM data), this means that housing production will need to increase by around 267 housing units per year. About one third new housing units with the interim future housing needs shown below (calculated with the Washington Department of Commerce's HAPT projections) would need to be affordable to households at or below 50% of area median income. Development of regulated affordable housing can face a

[20] Washington State Department of Commerce. (March 1, 2023). This analysis relied on Allocation Method A.

number of challenges and typically requires sizable gap financing to make projects feasible.[21]

Exhibit 52. City of Vancouver interim future housing need by income category, 2023–2045
Source: ECOnorthwest estimates, Washington Department of Commerce Housing All Planning Tool Projections. PSH: Permanently Supportive Housing.[22]



[21] Abby Boshart, 'Reducing Affordable Housing Barriers,' Urban Institute, March 30, 2022, https://housingmatters.urban.org/articles/reducing-affordable-housing-barriers-will-be-critical-addressing-mounting-rental-crisis.

[22] Washington State Department of Commerce, "Updating GMA Housing Elements," February 2023, www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/updating-gma-housing-elements/. *"Permanent supportive housing" (PSH) is subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the residents health status, and connect the resident of the housing with community-based health care, treatment, or employment services. Permanent supportive housing is subject to all the rights and responsibilities defined in chapter 59.18 RCW. "Emergency housing" means temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement. Source: RCW 36.70A.030.*

Section 6. Local workforce and commuting trends

Regional commuting patterns and workforce trends are interconnected and changing. Employment trends and commuting patterns can provide insight on the needs of workers today and into the future. Employment plays an important role in where people live, and it can influence where people move. If the data shows that many people are commuting into the city for work, it could indicate that the city does not have enough housing to accommodate its workforce or enough housing that meets their needs and affordability levels.

Prior to the COVID-19 pandemic, many workers traveled to in-person jobs located in central business districts five days a week. Although current trends allow for greater locational flexibility and a variety of hybrid schedules, commute distances can still impact where residents seek employment opportunities. As such, jobs that require some level of in-person work may be more or less accessible to potential workers depending on the distance from residential areas.

This section describes the commute patterns of Vancouver residents and workers. The neighboring jurisdictions and unincorporated areas included in these data are those where people made the most trips to and from Vancouver. These areas, referred to in this section as "comparison geographies," include Portland, Hillsboro, Gresham, Camas, Battle Ground, Wilsonville, Milwaukie, Camas, Hazel Dell, Salmon Creek, and Beaverton. This analysis is limited to jurisdictions and unincorporated areas in Clark County and adjacent counties to control for primarily in-person commuting and avoids capturing fully remote workers who may live a further distance from Vancouver.

Key findings for commuting patterns include:

- **About a third of Vancouver workers live in Vancouver.** The fact that two thirds of Vancouver workers live outside the city could reflect a shortage of housing options suitable for Vancouver workers but could also be indicative of the growing appeal of neighboring Clark County jurisdictions as bedrooms communities for the Vancouver economy.
- **Vancouver had the lowest share of remote workers overall, at just 17%, compared with Hillsboro, at 25%, and Portland, at 29%. However, this share is substantial enough to monitor and track to help understand how this might affect housing needs.** Vancouver had the smallest percentage of remote

workers earning $65,000 or more per year when compared to Portland, Hillsboro and Clark County (at 52%). In comparison, Hillsboro and Portland had almost the same percentage, with Hillsboro having a slightly higher concentration of remote workers earning more than $65,000 per year (63 and 62%, respectively).

- **Vancouver has a higher share of workers who both live and work in the city (34%) than all nearby jurisdictions except Portland.** Vancouver residents are more likely to work in Vancouver than surrounding geographies. Vancouver workers are also more likely to be residents of Vancouver than any other single location in the area.[23]
- **Since 2010, the size of Vancouver's workforce and population has grown overall, while the share of people who commute to and from the city has stayed about the same, indicating that Vancouver has proportionately attracted both residents and workers**. In 2020, Vancouver had the second largest workforce among comparison geographies, after Portland. This grew 26% since 2010, with a slight dip from 2019 to 2020 in total workers and residents. This may indicate larger economic and population trends during the onset of the COVID-19 pandemic.
- **The second largest workplace destination for Vancouver residents is Portland and the second largest home destination for Vancouver workers is unincorporated Clark County.** The share of workers commuting from Vancouver to other destinations in Clark County increased since 2010.
- **Vancouver workers and residents had relatively short commutes in 2020 compared with other regional cities**. Of comparison geographies, workers commuting to Vancouver had the second shortest commute in 2020 (after Beaverton), and residents commuting from Vancouver had the fourth shortest distance in 2020 (with Beaverton, Milwaukee, and Portland residents all having shorter commutes). The average commute distance for Vancouver residents was 10.8 miles in 2020, while the average distance for workers at jobs in Vancouver was just over 11 miles–the second shortest among comparison cities.
- **Vancouver workers commuting for work tend to live in areas further north of the City. In contrast, Vancouver residents commuting to work tend to**

[23] In comparison, the City of Seattle has around 64%, the City of Spokane has nearly 55%, the City of Bellevue has almost 24%, and the City of Tacoma has almost 30% of persons living and working in the same city in 2020.

commute to destinations south of Vancouver such as to Portland, Gresham, and Tigard.

Vancouver is part of a connected regional economy, with residents of the city working in different locations across Clark and surrounding counties (particularly the City of Portland). Vancouver is also an important contributor to this regional economy through its major institutions and employment hubs. The City draws in workers from across the area, with commuters traveling from suburban areas of Clark County and beyond.

Since the onset of the COVID-19 pandemic in 2020, remote work trends have accelerated in many places, particularly for certain job types like professional services that are less likely to require in-person work. The United States Census Bureau is still adapting to the nuances of changes in the way that people work in remote and hybrid settings. Exhibit 53 shows the percentage of remote workers by area in the region. This data is derived from a question in the 2022 American Community Survey about means of transportation to work that asks respondents 'How did you usually get to work last week?'[24] While this variable does not separate between fully remote and hybrid workers, it is at minimum representative of individuals that worked from home more frequently than commuting to a workplace. Vancouver had the smallest percentage of remote workers among all geographies, a little over half the percentage that Portland has.

[24] US Census Bureau, 'American Community Survey and Puerto Rico Community Survey 2022 Subject Definitions.'

Exhibit 53: Percentage of remote workers by region, 2022
Source: ACS 1-Year Data Tables, Table B08006, 2022.

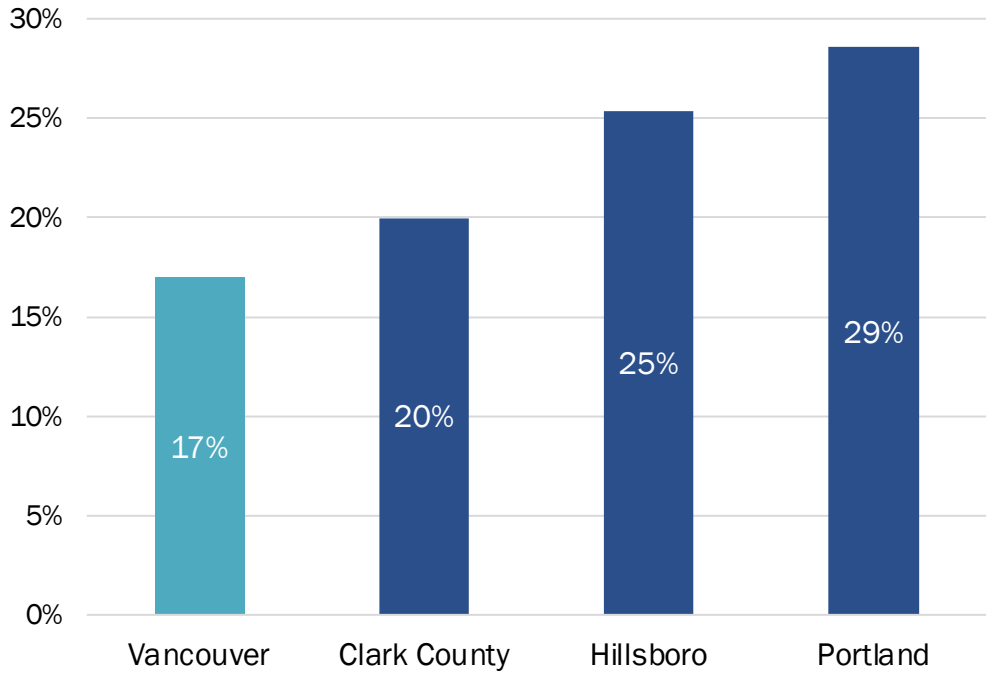
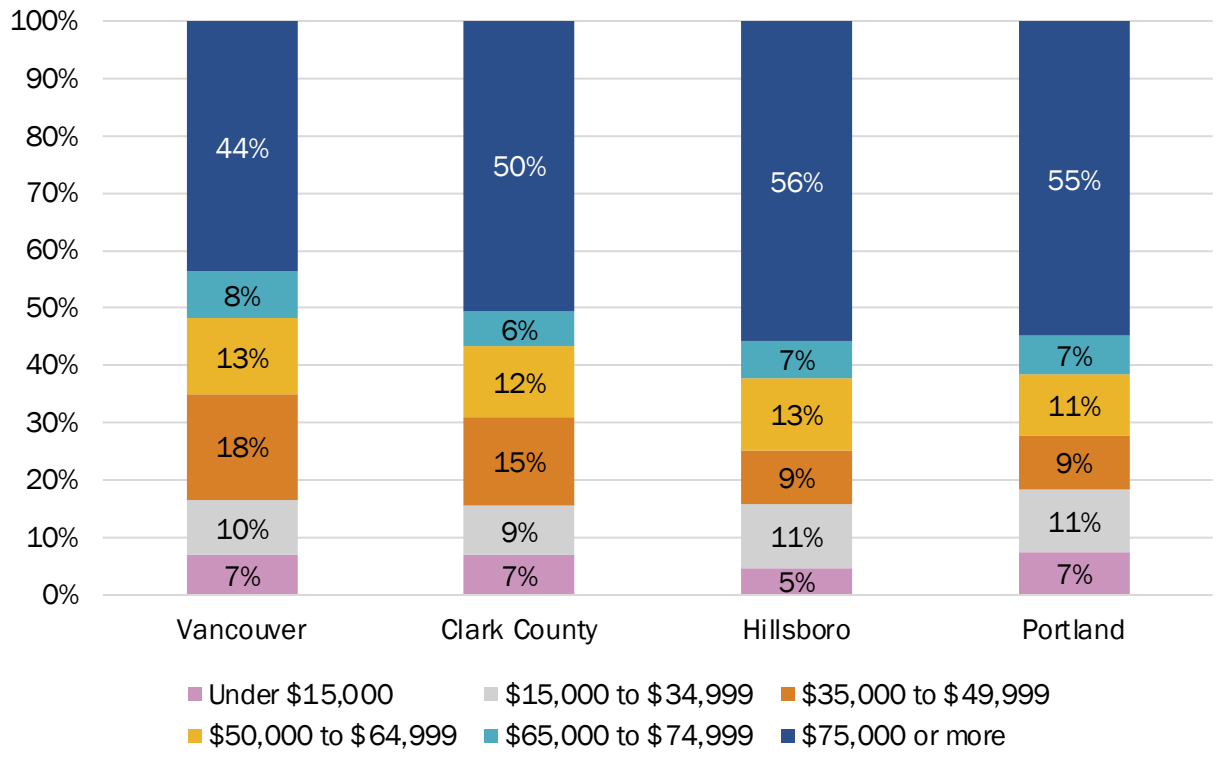


Exhibit 54 shows the breakdown of remote workers incomes by region. The US Census Bureau assigns income brackets for this data with the largest group in the data capturing those earning $75,000 or more. Due to these bin levels there is not a more accurate breakdown of income levels above this number at the City level. Vancouver has the smallest share of remote workers earning over $65,000, at 52%. In comparison, Portland and Hillsboro had shares of remote workers earning over $65,000, at 62 and 63%, respectively.

Exhibit 54: Remote workers' incomes by region, 2022
Source: ACS 1-Year Data Tables, Table B08119, 2022.



The maps below depict two-dimensional density regions, which are broken out into four tiers. These can be best described as representing the smallest area that can contain 99%, 95%, 80%, and 50% of all commutes to or from Vancouver. These types of cartographic representations are best used as generalizations of spatial concentrations of points, and since these percentage values can often be confusing or abstract for the general reader, we have re-labeled them to "High" and "Low" at the 99% and 50% tiers.

Exhibit 55: Workplace location of Vancouver residents, 2020
Source: LODES, 2010-2020

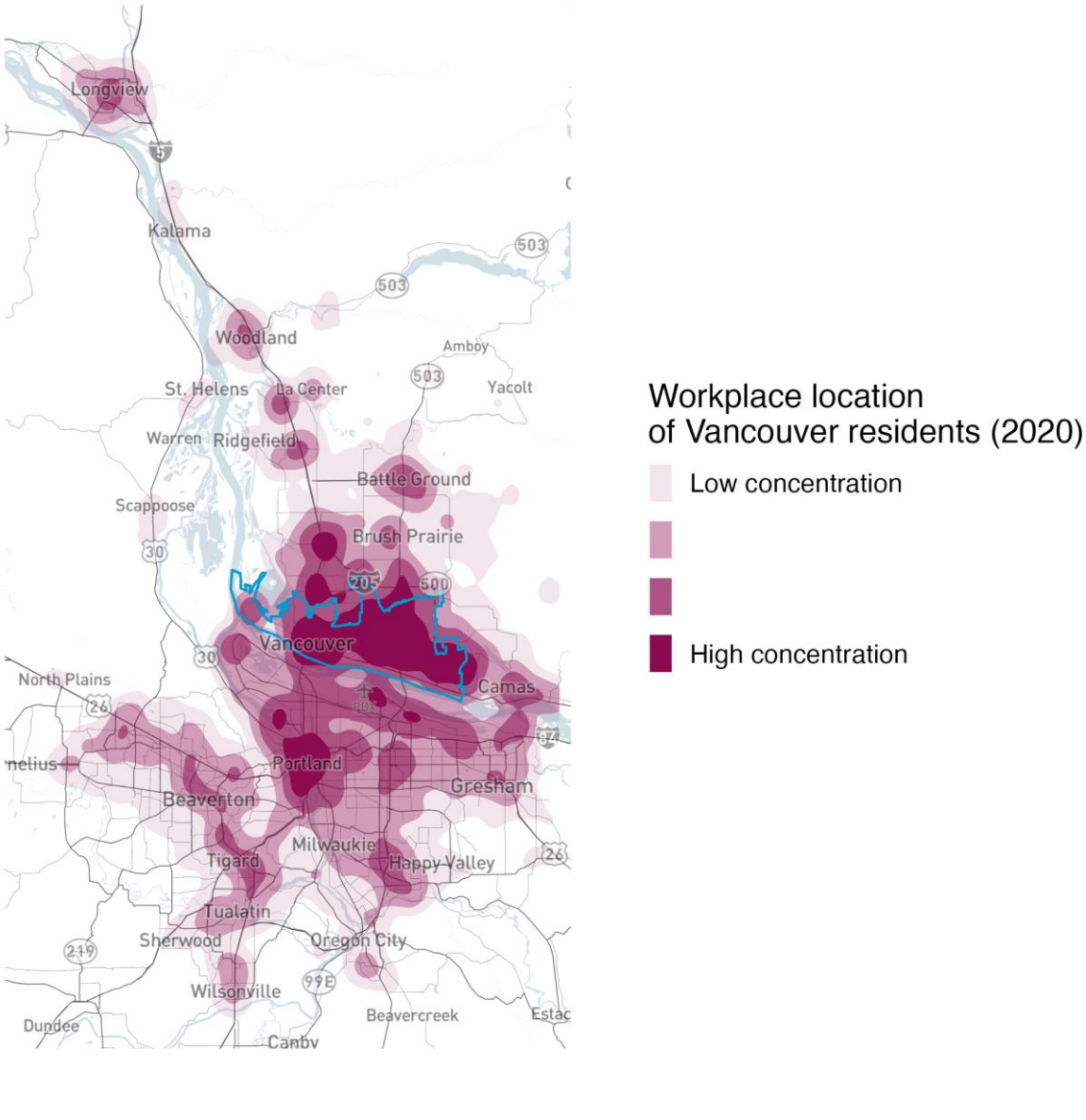
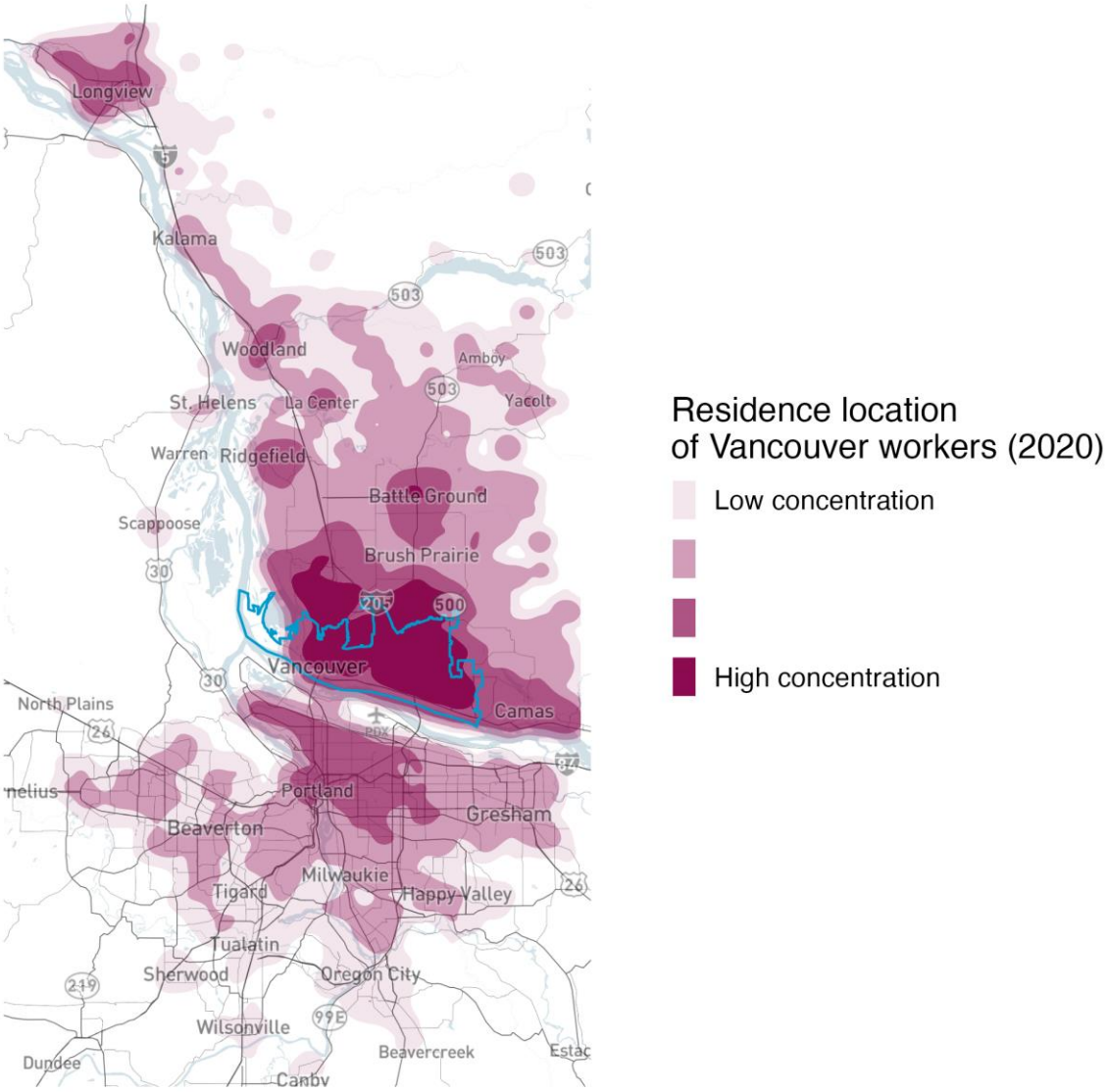
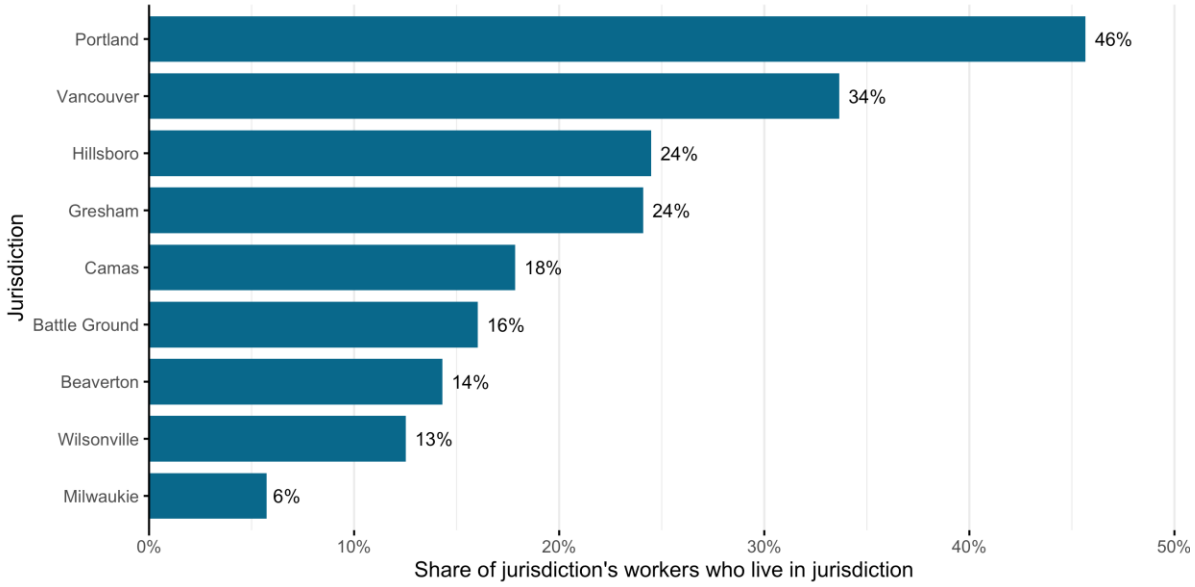


Exhibit 56: Residence location of Vancouver workers, 2020
Source: LODES, 2010-2020



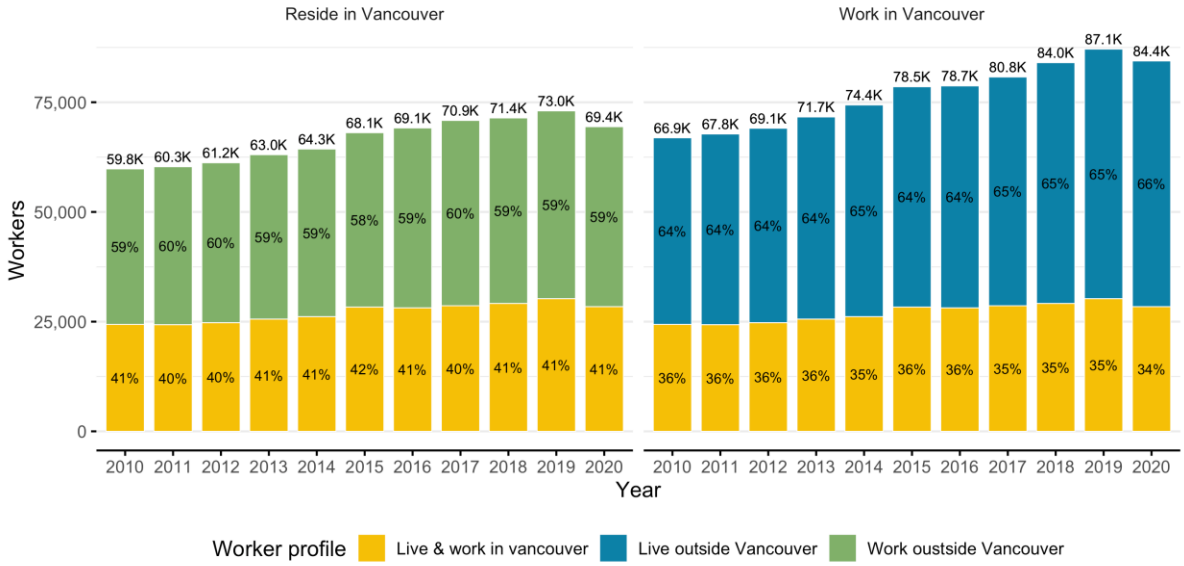
Of comparison geographies in the region, Vancouver had the second largest share of workers who both live and work in the city (34%) after Portland in 2020 (see Exhibit 57 below). Other cities and towns in the area saw much lower shares of workers who lived within the same location, particularly smaller jurisdictions to the south of Portland like Milwaukie and Wilsonville.

Exhibit 57: Share of workers living and working in Vancouver and surrounding cities, 2020
Source: LODES, 2010-2020



In Vancouver, the total number of residents and workers grew overall between 2010 and 2020 (with a slight decline in 2020 from previous years), as shown in Exhibit 58. The share of the population both living and working in the city remained about the same from 2010 to 2020, indicating that Vancouver has proportionately attracted both groups. In 2020, Vancouver had 84,413 workers, the second largest workforce among comparison geographies in this analysis, after Portland (with 396,692 workers in 2020) growing by 26% since 2010 from 66,898 to 84,413 workers (by 17,515 workers). However, in 2020 the city saw a slight decline in both residents and workers for the first time in the ten-year period. This may indicate larger economic and population trends during the onset of the COVID-19 pandemic, including a national spike in unemployment, an increase in early retirements, and relocation in response to greater locational flexibility.

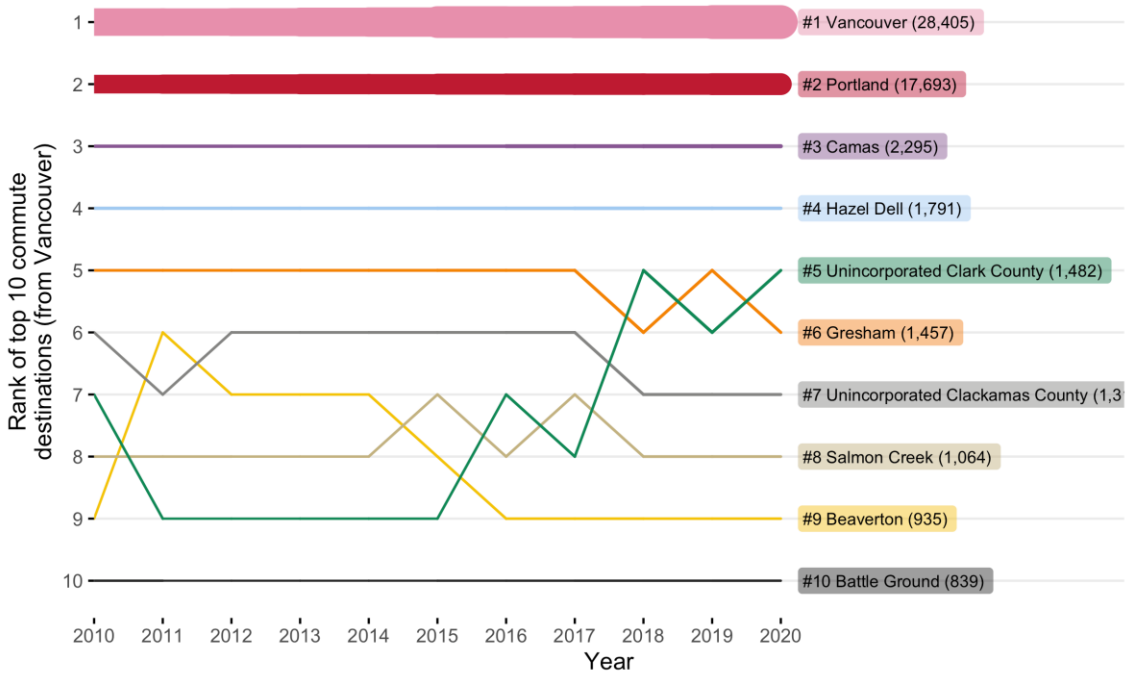
Exhibit 58: Share of residents and workers living and working in Vancouver, 2010-2020
Source: LODES, 2010-2020



Vancouver's residents are more likely to work in Vancouver than surrounding geographies. The second largest *destination* for Vancouver residents is Portland, followed to a lesser extent by Camas, Hazel Dell, and unincorporated Clark County (see Exhibit 59). Top destinations have remained steady since 2010, although the share of workers commuting to destinations in Clark County increased.

Exhibit 59: Top commute destinations from Vancouver, 2010-2020

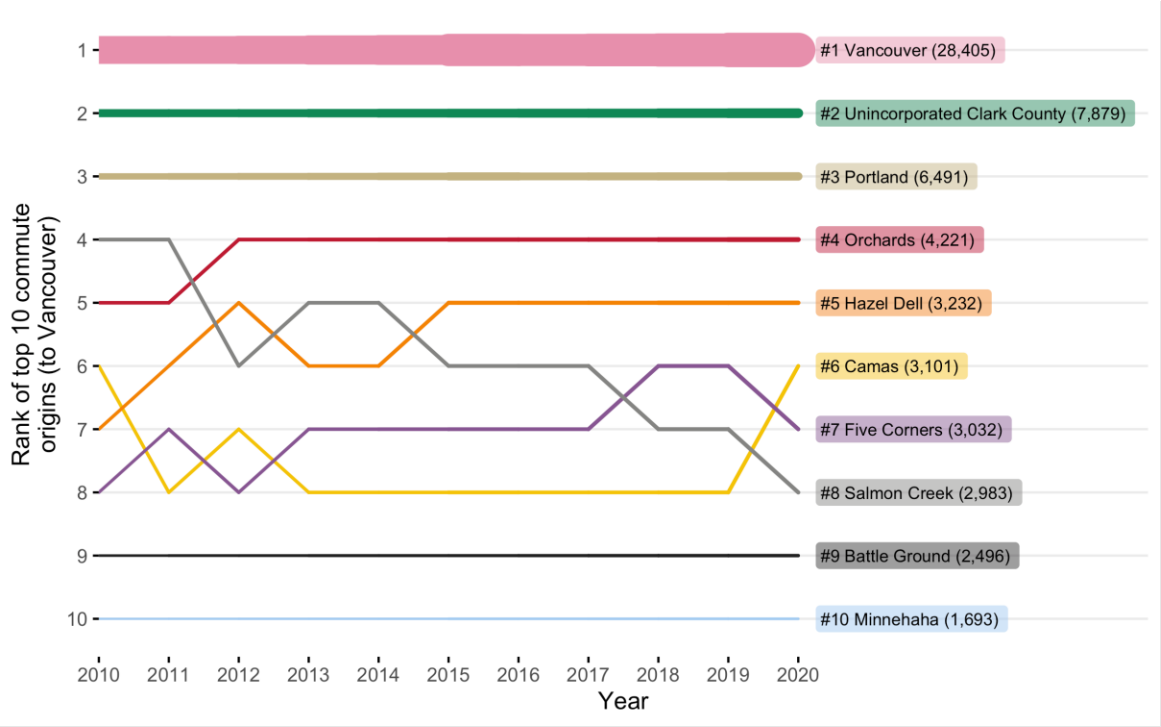
Source: LODES, 2010-2020. Note: Heavier line weights indicate the larger number of commuters shown in parentheses on the right of each destination.



Vancouver workers are also more likely to be residents of Vancouver than any other single location in the area. Residents of unincorporated Clark County are the largest group of workers *commuting into* the city of Vancouver, followed closely by workers from Portland. To a lesser extent, workers also commuted from smaller cities in Clark County and surrounding counties.

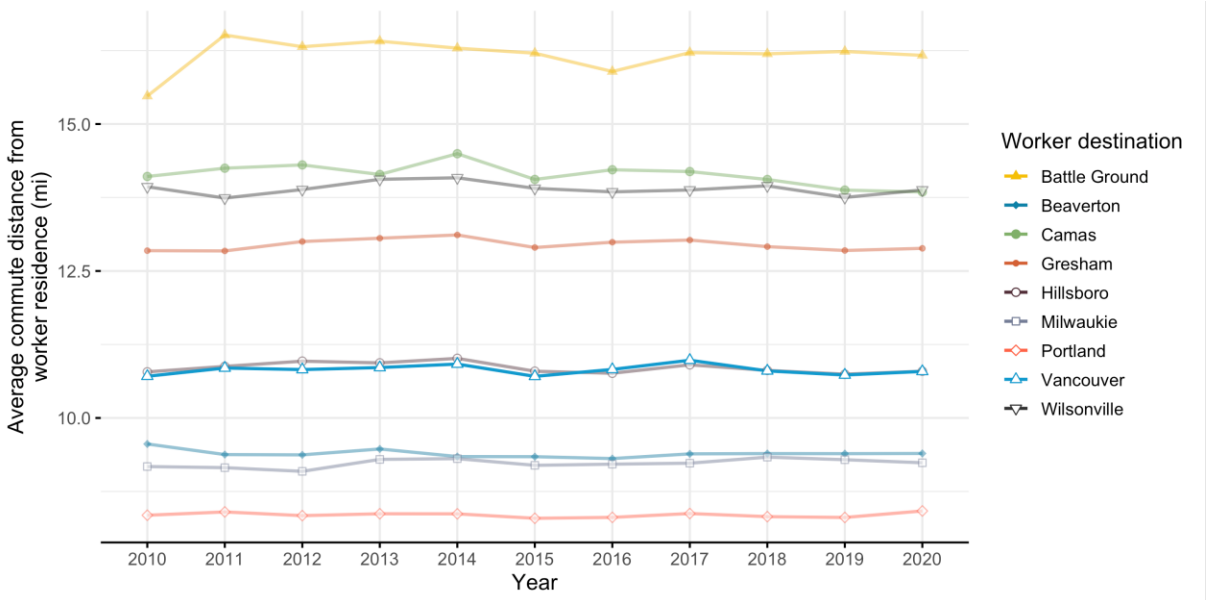
Exhibit 60: Top commute origins to Vancouver, 2010-2020

Source: LODES, 2010-2020. Note: Heavier line weights indicate the larger number of commuters shown in parentheses on the right of each origin.



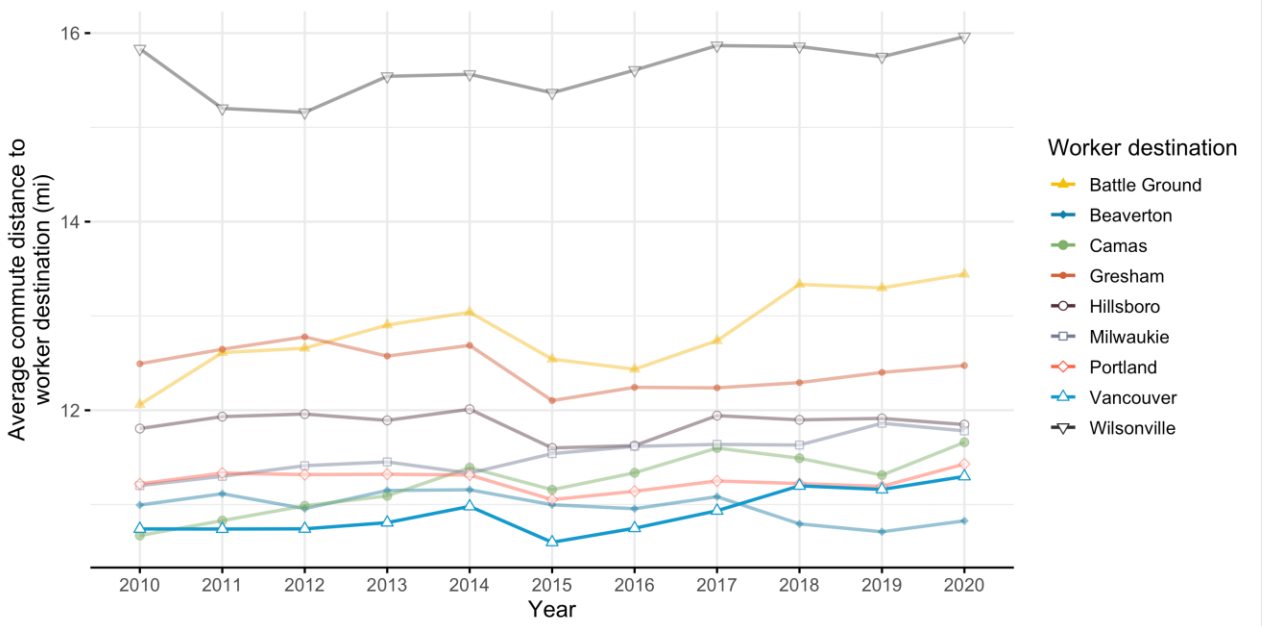
Residents commuting *from* Vancouver had the fourth shortest distance in 2020 (with Beaverton, Milwaukee, and Portland residents all having shorter commutes), at about 10.8 miles on average. This fluctuated only slightly between 2010 and 2020.

Exhibit 61: Average commute distance from worker residence, Vancouver, and surrounding cities (residents), 2010-2020
Source: LODES, 2010-2020



Of comparison geographies, workers commuting *to* Vancouver for work had the second shortest commute in 2020 (commuters to Beaverton had the shortest), at just over 11 miles on average. The average commute for Vancouver workers grew slightly since 2010 by about 0.5 miles.

Exhibit 62: Average commute distance to worker destination, Vancouver, and surrounding cities (workers), 2010-2020
Source: LODES, 2010-2020



Section 7. Equity and displacement considerations

Displacement risk analysis

As Vancouver grows and sees increasing demand for housing, the city faces new challenges around displacement and gentrification for its existing households. The combination of housing underproduction and a competitive regional housing market put upward pressures on the market that can have implications for local communities, particularly those with higher shares of vulnerable populations. Displacement risk describes when these pressures in the real estate market may force households to relocate due to rising costs for housing or increased interest from outside development. Addressing displacement in areas facing the highest risk through intentional strategies can help to prevent negative externalities of new development and growth.

In 2022, the City of Vancouver created a Displacement Risk Map to facilitate conversations among decision-makers and community partners working to prevent displacement of existing residents. This section summarizes the methodology and discusses the implications for neighborhoods found to have the greatest displacement risk.

Who is at risk of displacement?

Residential displacement can affect a wide range of households with different characteristics but is more likely to impact people experiencing low income, who already face disproportionate housing-related challenges. While displacement can happen to both renter and owner households, tenure is a key factor alongside a number of social factors that come into play when considering who is at risk. Householders who face disadvantages or discrimination in the real estate market are often more vulnerable due to the inability to absorb price increases. This covers a range of characteristics, with some of the most critical including:

- **Low-income households and particularly those who rent, are at greatest risk of being forced to move due to rising rents,** since they have limited ability to pay higher prices that come with rent increases and may already be facing tradeoffs between paying rent and covering other basic needs for their household. While Washington state regulations offer some protection for renters, private property owners have no limit on rent increases aside from

buildings under public-private agreements to provide regulated affordable housing.[25]

  - **Low-income households** are measured by census tracts with a share of households below 80% of MFI (or AMI) that is higher than the City average.
  - **Renters** are measured by census tracts with a share of renter households higher than the City average.

- **Adults without college degrees** have less ability to increase their income to cover higher housing costs and may have to work multiple low-wage jobs to make ends meet. Educational attainment (as well as income) is not protected under federal housing legislation, also leaving these households more vulnerable to discrimination.

  - **Education levels** are measured by census tracts with a share of adults 25 years or older without a four-year degree higher than the City average.

- **Black, Indigenous, and People of Color (BIPOC)**—particularly people who are Black, Indigenous, and/or Latinx—tend to face greater housing discrimination and may have a harder time finding other housing if they are forced to move. Race, color, and national origin are all protected by the Fair Housing Act, but the long history of racist housing policies in the United States continues to impact household wealth and housing options for many people of color. The legacy of these practices contributes to ongoing disparities in homeownership and housing cost burden nationwide. Past policies barring people of color from homeownership have played a role in systemically preventing accumulation of generational wealth to the extent of White families whose homes have appreciated in value over time, contributing to persistent unequal barriers that create more vulnerability to displacement.

  - **BIPOC households** are measured by census tracts where the share of the population that are communities of color is higher than the City average (including all groups except for white non-Hispanic residents).

[25] RCW 36.01.130 pre-empts jurisdictions from adopting local rent control ordinances, but other state regulations provide some protections around notice to vacate.

What market factors indicate displacement risk?

Real estate market trends are also critical for understanding displacement risk and gentrification. Appreciating property values and rents indicate upward pressures on the market where the cost to buy or rent a home is becoming more expensive. When these market factors occur in areas with higher shares of vulnerable populations (described above) who may be less able to absorb price increases, there is heightened risk that households will be displaced.

Changes to rental and home sale prices do not always track together and may be more or less sensitive depending on the makeup of an area's housing stock. In Vancouver, accurate, point-level, and up-to-date information about rental rates was not consistently available for the City's analysis, though home sale prices are available through Regional Multiple Listings Service (RMLS). While this makes a full assessment of real estate market pressure more difficult, it indicates general appreciation rates at the tract level and in comparison, with neighboring tracts.[26] The appreciation rate is the percentage change in median sale values or rental indices.

How is displacement risk assessed?

The City of Vancouver created its Displacement Risk Map to better understand displacement pressures citywide and further the city's equity goals by pairing investments with anti-displacement strategies in areas shown to have greater displacement risk, using the methodology of the City of Portland's 2018 Gentrification and Displacement Neighborhood Typology Assessment and Dr. Lisa Bates' previous work at the University of Portland. This assessment uses the demographic factors described above to measure socioeconomic vulnerability[27] to displacement as well as housing market data based on changes between 2010 to 2020. 2007 is the base market year used for home prices, to capture prices when the market was at its peak before the 2008 crash.

This methodology includes seven different categories for describing displacement risk based on the combination of socioeconomic vulnerability

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[26] Vancouver's analysis uses 'rook adjacency' that focuses on comparison with tracts that share an edge to focus on "spillover" effects of rising home values.

[27] The City's study defined vulnerable tracts by analyzing the distribution of quintile scores, and then set the threshold at approximately the 75th percentile.

factors and real estate market trends by tract, grouped into **early-stage, mid-stage, or late-stage gentrification** as defined in Exhibit 63.[28]

Exhibit 63: Description of displacement risk typologies
Source: City of Portland

<table>
<tr><th>Early-Stage Gentrification</th><th>Mid-Stage Gentrification</th><th>Late-Stage Gentrification</th></tr>
<tr><td>Susceptible
Area has a higher share of vulnerable populations but has not yet experienced demographic change; housing market is low to moderate, but adjacent to tracts with high or increasingly values</td><td rowspan="3">Dynamic
Currently undergoing gentrification: there are higher shares of vulnerable populations, and the area is experiencing demographic changes and losing vulnerable populations proportionally; housing market is still low or moderate but has experienced high appreciation since base year for rents and sales prices</td><td>Late: Type 1
Area has a higher share of vulnerable populations but has lost a proportionate share; housing market was low at the base year but is now high</td></tr>
<tr><td>Early: Type 1
Area has a higher share of vulnerable populations but has not yet experienced demographic change; housing market is low to moderate, but seeing high appreciation since base year</td><td>Late: Type 2
Area has lost a previously high share of vulnerable populations; housing market remains low or moderate but has appreciated since base year</td></tr>
<tr><td>Early: Type 2
Area has a higher share of vulnerable population and is experiencing demographic changes and losing vulnerable populations proportionally; housing market is low to moderate, but adjacent to tracts with high or increasing values</td><td>Continued Loss
Area has lost a previously high share of vulnerable populations; housing market was low or moderate at the base year but is now high</td></tr>
</table>

[28] City of Portland Bureau of Planning and Sustainability, "Gentrification and Displacement Neighborhood Typology Assessment," October 2018.

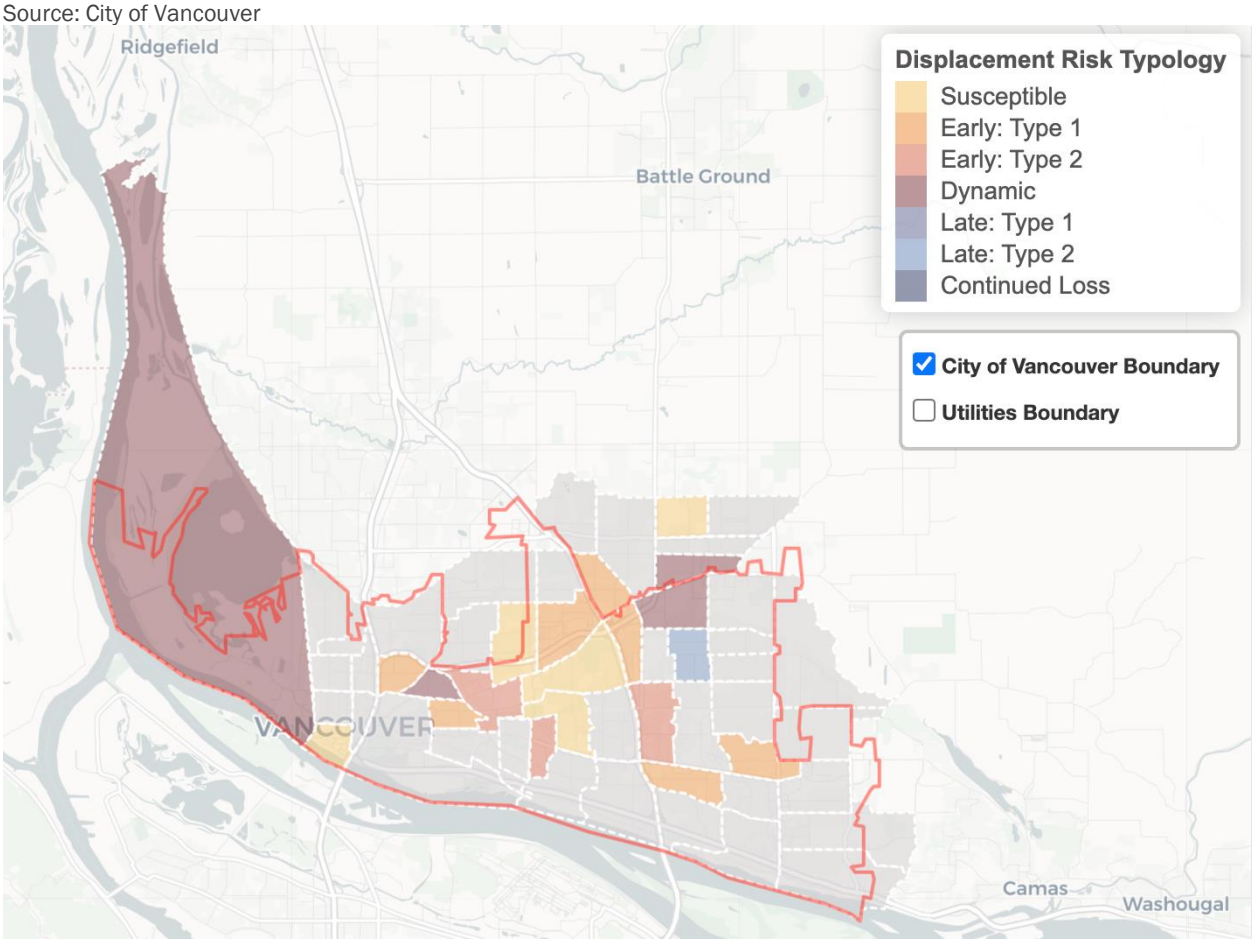
Where is there displacement risk in Vancouver?

Exhibit 64 displays the results of this analysis for the City of Vancouver, using the base housing year of 2007 and demographic and housing market year range of 2010 to 2020.[29] The map below shows tracts that meet the criteria for different displacement typologies based on their change over this time period. The City's analysis finds that as of 2020, the city had only one tract showing late-stage gentrification, but a concentration of tracts experiencing various levels of early- to mid-stage gentrification, including:

- **Sixteen early-stage census tracts**, including six Susceptible, seven Early Type 1, and three Early Type 2 primarily in central Vancouver
- **Four mid-stage Dynamic** tracts
- **One late-stage** tract (Late Type 2)

[29] All dollar amounts were adjusted for inflation using the Consumer Price Index.

Exhibit 64: Displacement risk map, Vancouver, 2010-2020
Source: City of Vancouver



The analysis had to be generalized at the tract level scale and some of the sub-sections in tracts might include nonresidential uses (such as open space zoning) without residential populations.

What does this mean for Vancouver?

Communities in Vancouver are facing displacement risk, but few areas have reached late-stage gentrification. Fourth Plain Village and North Image represent the two neighborhoods which fall into the Dynamic typology, with Image (just south of North Image) being the only tract which has reached Late-Stage gentrification based on the methodology. These 'Dynamic' neighborhoods are areas where focusing new anti-displacement actions can still help to prevent loss of vulnerable populations and before they reach late-stage trends.

Early gentrification and susceptible neighborhoods are concentrated in Central Vancouver. While few tracts along the waterfront and eastern edges of the city

are showing gentrification trends, tracts located in central Vancouver which fall into Early Type 1 and 2 or Dynamic typologies are where there is a larger share of existing residents facing growing displacement risk along Fourth Plain Boulevard, I-205, and WA-500. In these areas, preserving low-cost housing and preventing loss of vulnerable populations can help keep neighborhoods from advancing further into mid- or late-stage gentrification.

In terms of public intervention, the most effective anti-displacement strategies vary by what stage a neighborhood is currently experiencing. The City's 2019 Reside Vancouver plan presents a package of recommended strategies for preventing displacement, which include citywide and geographically specific strategies for the Fourth Plain Corridor.[30] Strategies to prevent displacement can include actions that preserve existing low-cost housing, create new affordable housing options, increased economic opportunities for residents, and support homeownership to stabilize households depending on how much low-cost housing is still available and how many vulnerable residents are still located in the area.

[30] City of Vancouver, "Reside Vancouver: An Anti-Displacement Plan," 2019 https://www.cityofvancouver.us/business/planning-development-and-zoning/long-range-planning/aging-in-place/anti-displacement-strategy/.

HNA appendix

Main data sources used

This analysis uses data from multiple sources, focusing on those that are well-recognized, reliable, verifiable, and of higher accuracy.

National data

One of the key sources for housing and household data is the U.S. Census Bureau. This report primarily uses data from the following Census sources:

- The Decennial Census, completed every ten years, is a survey of all households in the U.S. The Decennial Census is considered the best available data for information such as demographics (e.g., number of people, age distribution, or ethnic or racial composition), household characteristics (e.g., household size and composition), and housing occupancy characteristics. As of 2010, the Decennial Census does not collect more detailed household information, such as income, housing costs, housing characteristics, and other important household information. Decennial Census data is available for 2000 and 2010.

- The American Community Survey (ACS) is an ongoing nationwide survey completed every year or every five years by the U.S. Census Bureau. This data surveyed a sample of households in the U.S. The ACS sampled an average of 3.5 million households per year, or about 2.9 percent of the households in the nation. The ACS collects detailed information about households, including demographics (e.g., number of people, age distribution, ethnic or racial composition, country of origin, language spoken at home, and educational attainment), household characteristics (e.g., household size and composition), housing characteristics (e.g., type of housing unit, year unit built, or number of bedrooms), housing costs (e.g., rent, mortgage, utility, and insurance), housing value, income, and other characteristics. The survey is designed to provide communities with current data about how they are changing.

    - The ACS 5-year sample is available for smaller towns/cities with fewer than 65,000 residents. The ACS 5-year estimate includes data collected over a 60-month period or five calendar years (e.g., 2011–2015 ACS estimates). The ACS 5-Year data is offered at different scales/geographies including Census Tract and Census Place. The main advantage for the 5-year estimates is the increased statistical reliability for smaller geographic areas and small population groups. It is not recommended to compare two 5-year estimates over two time periods back-to-back since it is difficult to determine whether the values are applicable for the beginning or the end of the time frame.

- **Comprehensive Housing Affordability Strategy (CHAS)**. The U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey data annually which provides surveyed information collected over a five-year period which is averaged (such as 2012 to 2016). The CHAS data are used by local governments to plan how to spend HUD funds and may also be used by HUD to distribute grant funds. Another purpose is to estimate housing assistance by estimating the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80 percent of the median income). The CHAS data provide counts of the numbers of households that fit these HUD-specified characteristics in HUD-specified geographic areas. The HUD CHAS data is a common source of data for describing cost-burdened households.

- The **Longitudinal Employer-Household Dynamics (LEHD)** program is part of the Center for Economic Studies at the US Census Bureau. This program provides publicly available data including federal, state and Census Bureau data on employers and employees. The LEHD program combines Unemployment Insurance earnings data and the Quarterly Census of Employment and Wages (QCEW) data from the states with other administrative data, and information derived from censuses and surveys. This data includes statistics on employment, earnings, and job flows. LEHD Origin-Destination Employment Statistics (LODES) provides GIS/map information on commuting trends at the census block scale. Data files are organized into three types: Origin-Destination, Residence Area Characteristics, and Workplace Area Characteristics, all at census block geographic detail. Source: https://lehd.ces.census.gov/data/#lodes.

- **CoStar** provides data on multi-family pricing and vacancy rates over time. Market data comes from CoStar, a proprietary data source commonly used for market analysis in the real estate industry. While CoStar is one of the best available sources of rent and vacancy data overall, the data has gaps and limitations that make it less reliable in areas with few existing buildings. Newer buildings and those that are professionally managed are more likely to have reliable rent and vacancy information, while smaller, older buildings may have incomplete data or be missing from the system entirely.

State data

- The **Washington State Office of Finance and Management (OFM)**. OFM researches a variety of issues related to the state budget, public policy, and demographics and releases the official state and local population estimates and projections for use in the allocation of certain state revenues, growth management, and other planning functions. They provide mostly tabular data describing current demographics, housing (median home prices), and population densities and population forecasts and projections. As the

official partner of the U. S. Census Bureau for Washington state, the Population unit helps disseminate information about the characteristics of Washington's population, housing, and economy and provide guidance to a variety of stakeholders in accessing and using demographic information. https://www.ofm.wa.gov/washington-data-research/population-demographics

Memorandum

To: City of Vancouver

From: Tyler Bump, Mike Wilkerson, Kaitlin La Bonte, Mary Chase, Jennifer Cannon; ECOnorthwest

CC: Nicole McDermott, Brian Carrico; WSP

Subject: Economic Conditions and Opportunities Analysis, City of Vancouver Comprehensive Plan Update

Date: June 21, 2024

Section 1. Introduction, Background, and Summary of Findings

Introduction

The City of Vancouver is embarking on an update to its Comprehensive Growth Management Plan and implementing regulations to establish an updated vision, policies, and implementation measures for the next 20 years. The updated plan and process are called Our Vancouver. The updated plan must be responsive to changing community dynamics, the strategic vision established by the City Council and include focused goals to address social inequities and climate change. The City will need to update their plan as a part of the periodic update process currently due in 2025.

The Comprehensive Growth Management Plan is a foundational document that provides the overall vision and policy direction for managing growth and development while considering effects on the built and natural environment and on public facilities. This will build from the City's Vision and Strategic Plan and is informed by other policy and plan documents. The current Growth Management Plan was originally adopted in 1994 in response to the enactment of the Washington State (State) Growth Management Act (GMA). In 2004, a comprehensive update to the plan was completed and a minor update was done in 2011, as required by the GMA. The city has changed significantly in the 18 years since 2004, particularly since the last update in 2011. The city is a dynamic and growing community that requires a plan that reflects its diversity, honors the past and provides a clear direction for the future.

As part of the City's consulting team led by WSP, ECONorthwest provided this Economic Conditions and Opportunities Analysis using the best available information from public and private data sources to assess the city and region's economic trajectory. This memorandum includes the findings from analyzing economic conditions and competitiveness, including measures of employment, growth and productivity, business creation and retention, entrepreneurship, investment flows, access to capital, distribution of wealth and income, and racial and geographic inclusion. Our analysis centers racial equity and geographic inclusion by focusing attention on data sources that we can disaggregate[1] and by integrating analysis helpful for promoting equitable outcomes. Key information from this memorandum will be incorporated into the Economic Opportunity Element to provide context and inform the direction the City's economic development should take over the next 20 years, from 2025 to 2045.

Executive Summary

Vancouver's economy is undergoing a transformative shift. The city is attracting and increasing the number of professional and creative class amenities[2] and, as these sectors grow, the City is becoming less dependent on traditional manufacturing industries to drive economic growth. Vancouver has experienced rapid population growth over the past two decades, attracting educated, higher-income workers and employment opportunities in targeted sectors like healthcare, technology, and manufacturing. A combination of factors including the City's lack of income tax, recent investments in public infrastructure, and relatively lower cost of housing compared with Clark County and the City of Portland. These cost advantages have made Vancouver a desirable place for many in the region to live, resulting in in-migration to the City of Vancouver. In particular, white-collar workers gaining greater locational flexibility due to remote work during the COVID-19 pandemic may have shifted or accelerated migration patterns and housing preferences permanently. Overall,

[1] Data that can be disaggregated by specific characteristics (like race and ethnicity) helps to reveal disparities between groups that may be obscured in aggregated data. Understanding how factors like income or homeownership vary across groups informs how to target interventions to address inequities and promote equitable outcomes over time.

[2] Creative class professions can be defined as people in science and engineering, architecture and design, education, arts, music, and entertainment whose economic function is to create new ideas, new technology, and new creative content, as well as professionals in business and finance, law, health care, and related fields.

outmigration of workers from Portland has contributed to Clark County's rapid growth, as well as more families and peak earning workers leaving Oregon in recent years.[3]

With rising demand for housing, Vancouver has seen increasing housing costs, rising displacement pressures, and economic disparities among communities. In particular, some people of color in Vancouver face higher levels of cost burdening, lower median incomes, lower rates of homeownership, and lower rates of educational attainment. In 2021, the median incomes of multiracial households, Black or African American households, Hispanic or Latino households, or households identifying as another race not listed were below the median income in Vancouver; in addition, a smaller share of residents over the age of 25 who were Black or African American, Hispanic or Latino, or another race alone had bachelor's degrees. Housing cost burden was also most prevalent for Black or African American and Hispanic or Latino households, indicating additional economic burdens. In recent years, commercial developers have gravitated to the city's larger buildable parcels, creating questions for how Vancouver should most strategically use its remaining buildable lands. As the city continues to grow, intentionally managing these changes will be critical to avoid negative impacts (like inefficient land use resulting in future land constraints), produce equitable outcomes, and ensure that Vancouver's land and resources are used efficiently.

As Vancouver updates its Comprehensive Plan, the findings point to several policy priorities:

- The City should pursue strategies to support equitable economic opportunities for all residents, especially those vulnerable to displacement.
- The City should consider inclusive economic development strategies that prioritize both the growth of the creative class and the retention of industries that provide employment opportunities for those without advanced degrees or specialized skills, such as traditional manufacturing jobs, construction related jobs, or labor in skilled trades.
- Supporting economic mobility is also critical, including workforce development initiatives and small business assistance programs targeted at disadvantaged groups.

[3] Josh Lehner, "2022 Migration: Who Left?," Oregon Office of Economic Analysis, September 14, 2023, https://oregoneconomicanalysis.com/2023/09/14/2022-migration-who-left/.

- Balancing economic development to meet the needs of a diverse workforce can contribute to a more equitable and sustainable local economy.
- Coordinated housing and economic development strategies should also be implemented to ensure there is an adequate housing supply for a growing workforce, avoid displacement of existing residents, seek place-based strategies in key areas, and catalyze mixed-use development through partnerships.

Planning Context

Growth Management Act Requirements

Comprehensive planning in Washington is guided by the Growth Management Act (GMA), a series of statutes first adopted in 1990 which requires cities and towns within eighteen of the state's most populous counties to fully plan for future growth (RCW 36.70A). Given Clark County and Vancouver's population size, both jurisdictions must address all of the mandatory comprehensive plan elements, including land use, housing, capital facilities, utilities, and transportation.[4] Economic development (as well as parks and recreation) are included as mandatory elements (RCW 36.70A.070(7-8)), but since no state funds have been allocated to assist jurisdictions in creating these plans, they are currently optional.

Economic Development Planning in Washington

The City of Vancouver has elected to include an economic development element as part of the current comprehensive plan update process, building on its current plan which was last updated in 2011 and following the GMA Goal 5 to:

> *"Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the*

[4] Since Vancouver also meets the criteria of annual maritime port revenues exceeding $60 million, it must also include a ports element.

capacities of the state's natural resources, public services, and public facilities[5]." *(RCW.36.70A.070(7))*

In Washington, state provisions set limits on what actions cities and counties can take to support economic development, which often guides the strategies, goals, objectives, and policies that jurisdictions establish in economic development comprehensive plan elements. Article 8, Section 7 of the state constitution specifies that "No county, city, town or other municipal corporation shall hereafter give any money, property, or loan its money, or credit to or in aid of any individual, association, company or corporation, except for the necessary support of the poor and infirm."[6] Given this limitation, cities generally cannot directly use public funds to attract private development, but can implement incentives and programs to promote the economic welfare of residents and create new opportunities. Many cities target policies that facilitate economic growth through land use, infrastructure, tourism, marketing, and partnerships with nonprofit community-based organizations.

Regional Economic Development Planning

Cities in Washington also coordinate with county-level Associate Development Organizations (ADOs) that represent each of Washington's counties, funded in part by the state Department of Commerce. The Columbia River Economic Development Council (CREDC) represents Clark County and presents a baseline of goals and objectives for the region. Their current 2018-2023 Comprehensive Economic Development Plan outlines goals and actions based on a vision and set of values and guiding principles identified through extensive engagement with local partners.

[5] In 2023, E2SHB 1181 updated the language of Comprehensive Plan goals (including economic development) to reflect climate change and resiliency goals.

[6] RCW 35.21.703 does allow cities to contract with nonprofit corporations to advance economic development.

Exhibit 1. Goals and Objectives from 2018-2023 CREDC Comprehensive Economic Development Plan
Source: CREDC

1. Expand the Existing Base	2. Support People	3. Create Place
• Become Industry Experts • Strategically Market Industry Clusters (Computers and Electronics, Software, Clean Tech, Metals and Machinery and Life Sciences), • Build a Startup Ecosystem	• Foster Skills Development • Prepare Youth for Economic Opportunity • Launch a Brain Gain Initiative • Promote an Ethical and Socially Just Society through an Intentional Commitment to Inclusion, Equity, and Diversity	• Each Community Creates a Placemaking Strategy • Embrace Economic Opportunity in our Urban Center • CREDC Tells the Story of Place • Make Employment Areas Desired by Industry Clusters Shovel Ready • Determine all Transportation Needs on a Regional Level Specifically to Support Economic Development

CREDC is now in the process of updating its 2018-2023 priorities and identifying new strategic actions to respond to Clark County's quickly changing demographic and economic profile, with a new plan anticipated to provide further guidance in 2024.

Implications for Growth Management

While economic development elements are currently optional under the GMA, aspects of the required land use and housing elements are linked with economic development and current conditions within jurisdictions. Cities fully planning for adequate land capacity to meet the needs of the community must understand their current employment base, development trends, workforce housing availability, income segments of the population, and future projections.

State statute requires that land use elements must "[designate] the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces and green spaces, urban and community forests within the urban growth area." (36.70A.070(1)) This includes population densities, building intensities, and estimates of future population growth. RCW 36.70A.070(2)(d) requires that a housing element "Makes adequate provisions

for existing and projected needs of all economic segments of the community, including…consideration of housing locations in relation to employment location."

To fully plan for growth and meet community needs in compliance with state provisions, cities like Vancouver, with sizable workforces, must understand the dynamics of the local and regional economy, consider where employment is concentrated and how residents and workers access employment opportunities, what industries are growing or declining, and whether there is sufficient space to fulfill anticipated employment land needs alongside other uses.

Buildable Land Capacity and Employment Capacity

In 1997, Washington's Review and Evaluation Program, also known as the "Buildable Lands Program," was added to the GMA (RCW 36.70A.215). It requires some counties and cities within them to establish their own buildable lands programs (including Clark County and the City of Vancouver) and produce a report every eight years. In 2017, the Washington legislature passed E2SSB 5254 which amended the buildable lands statute and required counties to "determine whether [its] cities are achieving urban densities within urban growth areas by comparing growth and development assumptions, targets, and objectives contained in the countywide planning policies and the county and city comprehensive plans with actual growth and development that has occurred" (RCW 36.70A.215).

RCW 36.70A.215 extends to providing sufficient land for employment by identifying the "amount of land developed for commercial and industrial uses within the urban growth area since the adoption of a comprehensive plan… [and] the amount of land needed for commercial, industrial, and housing for the remaining portion of the twenty-year planning period."[7] There are several recent and interim County documents that have implications for managing growth in the City of Vancouver covered in this section.

[7] The state's methodology used to evaluate employment land does not differentiate land by any market criteria such as size, infrastructure presence, cost, ownership, or availability.

Clark County Comprehensive Plan (2016)

Clark County in its last Comprehensive Plan update in 2016 adopted two planning assumptions (Resolution 2016-03-01), anticipating 100,200 new jobs and a jobs-to-housing ratio of 1:1. The County's 2015-2035 Comprehensive Plan projected that based on the VBLM (vacant buildable lands model) this would include:

- 75,847 new jobs from vacant buildable lands;
- 16,775 jobs accommodated through redevelopment; and
- 7,400 public sector jobs on publicly owned parcels not included in the VBLM.

The County is currently in the process of updating its Comprehensive Plan, which is required to be completed by December 31, 2025.

Clark County Buildable Lands Report (2022)

Pursuant to RCW 36.70A.215, in advance of its 2025 Comprehensive Plan update, Clark County produced a Buildable Lands Report in 2022 estimating remaining population and employment capacity, based on recent development trends, in local cities and Urban Growth Areas (UGAs). For Vancouver, the findings of the 2022 Buildable Lands Report indicated that the city and its unincorporated urban area (U) were anticipated to fulfill the largest share of Clark County's new employment land capacity needs through 2035 based on development trends in 2016-2020 (48% or 36,779 jobs). The largest share of total net buildable employment land in Vancouver to help meet this capacity was zoned Industrial (Exhibit 2).

The land and employment capacity analysis in the buildable lands report shown below in Exhibit 2 provides estimates based on data from the Washington Office of Financial Management, Washington Employment Security Department, Clark County, and individual municipalities. While these do not reflect the actual total number of jobs located in the county or its individual jurisdictions, they provide an approximate estimate for planning purposes to help measure how to achieve the County's economic goals. As the City updates its comprehensive plan economic development element, it will need to consider this regional role as well as any potential impacts of office redevelopment, remote work trends in the city's key industries, and patterns of mixed-use development that could have new implications for meeting employment capacity.

Clark County's Buildable Lands Report (2022) Key Findings

Based on employment growth through 2020, redevelopment, and public sector job assumptions, the Clark County Buildable Lands Report indicated sufficient employment capacity for employment growth in the county through 2035.

Clark County added 12,700 jobs in 2016-2020 out of its target from the 2015-2035 Plan of adding 100,200 jobs by 2035. **Therefore, the Buildable Lands Report forecasted that the County would add 87,500 more jobs by 2035.**[8] Of this total, 72,878 jobs were expected to be accommodated on vacant buildable lands and the remainder through redevelopment or public sector employment.

Half of Clark County's employment capacity from the 2022 report was in the City of Vancouver and the Vancouver Unincorporated Urban Area (U). These areas combined were expected to accommodate 36,779 total jobs through 2035, with 59% of new employment on industrial land. Vancouver (U) accounted for 47% of this capacity.

There were 5,792 total net buildable acres of employment lands in Clark County UGAs reported in the Buildable Lands Report; 33% (1,888 net acres) of commercial land, and 67% (3,904 net acres) of industrial land. **The largest share of total net buildable employment land reported was the 2,423 net acres (62%) of industrial capacity in the City of Vancouver and the Vancouver Unincorporated Urban Area.**[9]

[8] Clark County Community Development, "Clark County Buildable Lands Report," June 2022. The Buildable Lands Report must meet the Washington State requirements described under RCW 36.70A.215.

[9] The 2022 VBLM model assumes a 5% residential redevelopment rate on built Vancouver City Center commercial land and a 1% rate on built commercial land in Vancouver outside the City Center; and that 30% of commercial land in the Vancouver City Center will be residential development and 15% of Vancouver commercial land outside the City Center will be residential development.

Exhibit 2. Commercial and Industrial Land Capacity and Employment Capacity Estimates, by Clark County Jurisdiction, Urban Growth Area, or Unincorporated Urban Area, 2022
Source: Clark County Buildable Lands Report. UGA: Urban Growth Area

Jurisdiction	Commercial			Industrial			Total Jobs
	Gross Acres	Net Acres	Jobs	Gross Acres	Net Acres	Jobs	
Battle Ground UGA	643	395	7,881	157	71	643	8,524
Camas UGA	452	296	5,920	1,398	667	6,001	11,921
La Center UGA	115	79	1,573	64	34	308	1,881
Ridgefield UGA	374	252	5,031	806	418	3,762	8,793
Vancouver	433	304	6,089	2,758	1,470	13,225	19,314
Vancouver (U)	638	444	8,886	1,710	953	8,579	17,465
Washougal UGA	165	114	2,281	509	262	2,362	4,643
Woodland UGA	-	-	-	-	-	-	-
Yacolt UGA	5	4	81	49	29	256	337
Urban Total	**2,825**	**1,888**	**37,742**	**7,451**	**3,904**	**35,136**	**72,878**

Source: Clark County GIS, Vacant Buildable Lands Model, June 2022; Council Resolution 2022-06-01
Notes: A – Employment growth target for 2035 set by Clark County Council Resolution 2016-03-01.
B – Urban Total includes capacity in incorporated cities/towns and their unincorporated urban areas.
C – Unincorporated urban area is designated with a (U).

Vacant Buildable Land Model Update and initial growth allocations (2024)

Clark County made several updates to its VBLM in February 2024. Pursuant to GMA, the revised version of the VBLM estimated capacity by zoning rather than Comprehensive Plan designations, and used projected future rather than past densities. **Error! Reference source not found.** shows updated capacity estimates for jurisdictions in Clark County.[10] **In Vancouver and the City's Urban Growth Area (UGA), the changes to the VBLM indicate a slightly lower jobs assumption than the 2022 model**. The City is still expected to account for roughly half

[10] Clark County Community Planning, 'County releases 2023 vacant buildable lands model capacity report for public review,' https://clark.wa.gov/community-planning/county-releases-2023-vacant-buildable-lands-model-capacity-report-public-review, February 20, 2024.

(51%) of jobs in the County, with capacity for 33,193 total jobs through 20235, across 2,414 buildable acres in the City and 3,503 buildable acres in the UGA.

Exhibit 3. VBLM Capacity and Yield by Jurisdiction, 2023

Source: Clark County Community Planning

Jurisdiction	Housing Units	(%)	Jobs	(%)	Gross Acres	(%)	Buildable Acres	(%)
Battle Ground	6,978	7.4%	7,677	11.8%	2,919	11.1%	1,584	13.7%
Camas	4,222	4.5%	11,363	17.5%	3,304	12.6%	1,486	12.9%
La Center	2,122	2.3%	2,096	3.2%	953	3.6%	422	3.7%
Ridgefield	5,821	6.2%	7,998	12.3%	3,027	11.5%	1,332	11.5%
Vancouver (City Only)	31,726	33.7%	18,025	27.7%	5,677	21.6%	2,414	20.9%
Vancouver (UGA Only)	39,338	41.8%	15,168	23.3%	8,389	31.9%	3,503	30.4%
Washougal	3,741	4.0%	2,404	3.7%	1,743	6.6%	699	6.1%
Woodland	101	0.1%	0	0.0%	95	0.4%	23	0.2%
Yacolt	151	0.2%	360	0.6%	154	0.6%	76	0.7%
Total	94,200	100.0%	65,090	100.0%	26,262	100.0%	11,538	100.0%

For purposes of the 2025 Comprehensive Plan update, on May 7, 2024, Clark County adopted the below 2045 new employment growth capacity estimates, and new employment growth allocations.

Exhibit 4. 2045 Interim Employment Capacity Estimates and Allocations (2024)

Source: Clark County Community Planning

Jurisdiction	2023 VBLM Employment	Share	Construction Office	2023 Employment	Additional distribution not requiring new employmen			Total Jobs Planned	
	Land Capacity		Distribution	Land Allocation	Work from home	Construction-Field	Government		
Battle Ground	7,677	11.8%	172	7,847	416	594	392	9,249	
Camas	11,363	17.5%	255	11,615	615	879	549	13,658	
La Center	2,096	3.2%	47	2,142	113	162	45	2,463	
Ridgefield	7,998	12.3%	180	8,175	433	619	148	9,375	
Vancouver (City)	18,025	27.7%	405	18,424	976	1,395	5,522	26,317	
Vancouver (UGA)	15,168	23.3%	341	15,504	821	1,174	1,754	19,253	
Washougal	2,404	3.7%	54	2,457	130	186	187	2,961	
Woodland	-	0.0%	-	-	-	-	0	0	
Yacolt	360	0.6%	8	368	19	28	3	419	
UGA Total	65,091		1,463	66,534	3,524	5,038	8,600	83,695	Urban
Rural								4,405	Rural
								88,100	Countywide

Clark County has recently adopted a 2045 countywide employment projection of 269,000 total jobs to be used with the County's 2025 Comprehensive Plan Update.[11]

Intersection with Housing Needs

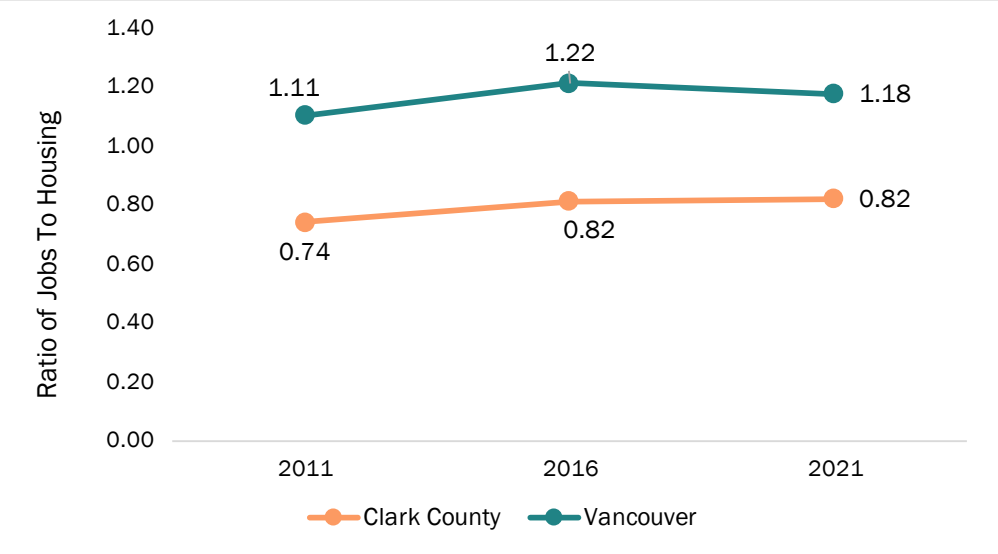
The County's interim population projection maintains the 1:1 jobs-to-housing ratio in the County's current 2015-2035 Comprehensive Plan. However, the City of Vancouver has had a consistently high jobs-to-housing ratio over the last 10 years compared to Clark County as a whole (Exhibit 5). As recently as 2021, the City of Vancouver had 1.18 jobs for every household compared to 0.82 jobs for every household in Clark County.[12]

The Housing Needs Assessment conducted for the Vancouver 2045 Comprehensive Plan Update identified a need for 43,198 new housing units through 2045 across Vancouver. **If the City of Vancouver continued to maintain an average of 1.17 jobs-to-housing units that has been observed between 2011-2021 through 2045, it would be on track to anticipate planning for 50,541 new jobs through 2045 (far above the County's interim allocation).** If the City of Vancouver applied the same 1:1 jobs-to-housing target as adopted by Clark County, the City would be on track for 43,198 new jobs (also above the interim allocation).

[11] https://clark.wa.gov/sites/default/files/media/document/2023-08/2023-08-01.pdf

[12] The jobs-to-housing ratio is another metric useful for describing the balance between a city providing available housing for local workers and adequate jobs for those living in a city. The City of Vancouver recognizes the need to balance jobs to housing as a way to ensure the attainment of an appropriate supply and mix of housing and affordability levels to meet the needs of people who work and desire to live in Vancouver. The city established a Comprehensive Plan policy calling for an increase in the ratio of jobs to residents in the City of Vancouver and the region. Vancouver's jobs to housing ratio is trending upwards with a slight increase from 2011 to 2021, as the city has transitioned from a suburban bedroom community to a city offering more employment opportunities.

Exhibit 5. Vancouver and Clark County Jobs to Housing Ratio 2011, 2016, 2021
Source: Office of Financial Management, LODES, 2011-2021,



Regional Position

Vancouver is one of the fast-growing cities in Washington, located in Clark County on the state's southwestern border with Oregon, along the north shore of the Columbia River. Vancouver is of growing importance within the greater Portland metropolitan area's interconnected economy. Within the region, Vancouver is home to several large institutions including Clark College, Washington State University's Vancouver campus, and PeaceHealth Southwest Medical Center, with access to a broader selection of 25 colleges and universities in the Portland metro area. Clark County is also home to major regional employers in computers and technology within the broader network of science and technology industry clusters in the Portland area, offering Vancouver residents access to a variety of jobs in growing sectors.

Given the interconnected nature of Portland and Vancouver's economies and different state and local tax structures, the two cities often compete for residents and jobs within the region. A number of factors can influence household and employer decisions about location, including these tax structures as well as other considerations like the cost of living, land availability, quality of life amenities, infrastructure, and others. Over the past decade, Clark County has consistently seen positive net in-migration of residents from other counties in the region (Multnomah, Clackamas, and Washington Counties) according to data by the U.S.

Internal Revenue Service (IRS).[13] The U.S. Census Bureau's populations estimates for 2021 also indicated that Clark County has had the largest population increase largely due to in-migration, while other counties in the region have all seen outmigration trends. Multnomah and Washington Counties both saw a net loss from outmigration in 2021, while Clackamas County also saw their lowest levels of in-migration for the last decade and low levels of natural population growth.[14]

Regional Transportation Access

Vancouver is well connected to major local and regional transportation corridors, including two interstate bridges that connect the city with Portland. Interstate Highways (I-) 5, 205, and 84 offer commuters' quick access by car or bus between Vancouver and the greater area, as well as a regional travel connection north to the Puget Sound and east along the Columbia River. While the bicycle and pedestrian networks may offer less direct options between cities, the I-5 and I-205 bridges provide protected pedestrian pathways over the river.

Exhibit 6. Map of Key Clark County Regional Infrastructure
Source: CREDC Business Guide
Note: This map from CREDC illustrates infrastructure in the broader region



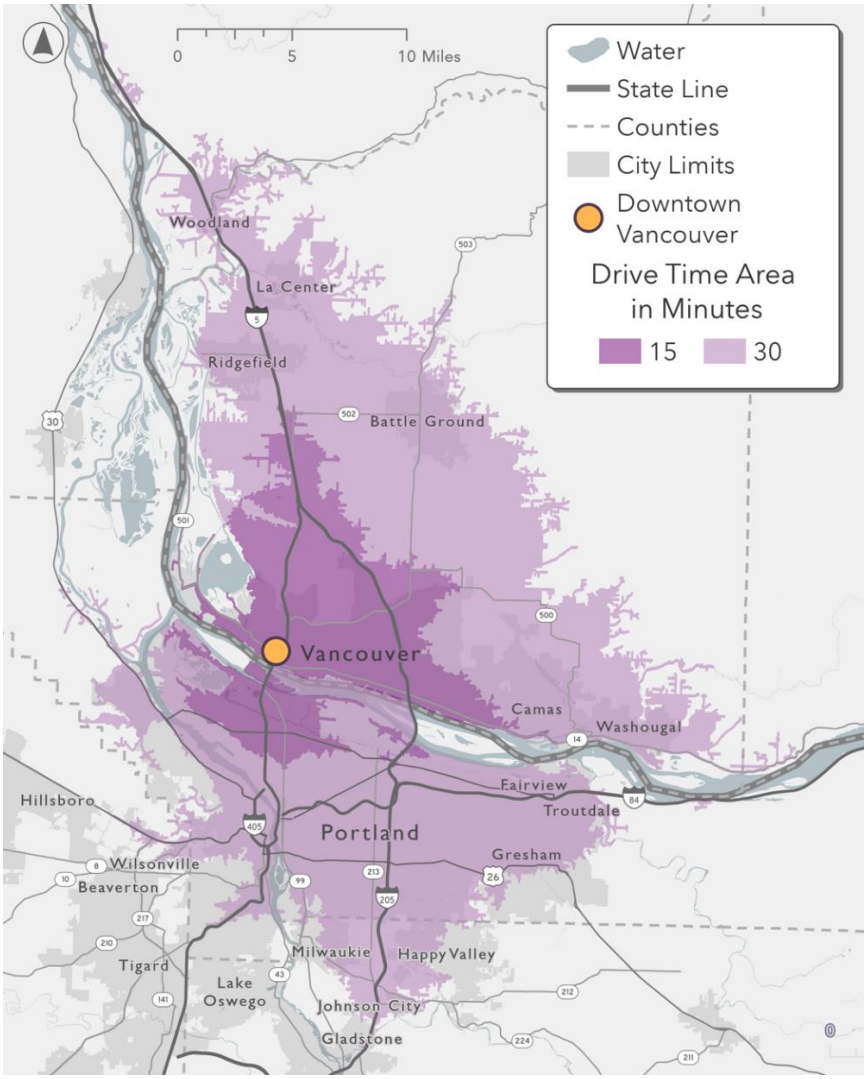
[13] Portland Business Alliance, "State of the Economy" (Value of Jobs Coalition, 2023).

[14] Ibid.

Surrounding Land Uses

Located at a nexus of two interstate highways, national rail lines, and ocean-bound and river shipping lanes, with proximity to the Portland International Airport, the city is well positioned to access major markets within the United States and around the world (see Exhibit 6)

Exhibit 7. Vancouver and Surrounding Jurisdictions, 15- and 30-Minute Drive Times from Downtown Vancouver
Source: ESRI
Drive times reflect an average outbound weekday morning commute



The city's access to deep water anchorages at the Port of Vancouver and Port of Portland, Union Pacific and BNSF railroad lines, and Portland International Airport (PDX) are among the city's strongest economic advantages for a number of industries. Regional markets accessible within a 30-minute drive include Downtown Portland, Gresham, Beaverton, Salmon Creek, Ridgefield, and Camas/Washougal (see Exhibit 7).

Summary of Key Findings

Demographic Trends

Vancouver, Clark County, and the State of Washington have grown substantially over the last two decades and are projected to continue to grow over the 20-year planning period. From 2000 to 2023, Vancouver's population grew by just over 56,000 residents, or 39%, which is higher than Washington state (35%) but lower than Clark County as a whole (53%). The pandemic may have shifted or accelerated migration patterns and housing preferences permanently, and Portland outmigration has contributed to Clark County's rapid growth.

The region's growth includes more educated and early working age adults, and higher income households to Vancouver. An increasingly educated and skilled workforce can help attract and retain employers, including those in CREDC's current target industry clusters for the County (Computers and Electronics, Software, Clean Tech, Metals and Machinery, Life Sciences). The community development needs associated with the growth of this skilled workforce will depend on employer workspace needs and existing office vacancy rates. A portion of this skilled workforce in occupations allowing for locational flexibility (such as tech-intensive industries) could work remotely at least part of the time or in co-working spaces rather than working fulltime at a centralized office space. As of 2022, approximately 17% of Vancouver's workers worked remotely (US Census data) and 52% of these workers earn over $65,000 per year (see the Vancouver Housing Needs Assessment for more information).

However, the city's increasing median household income can also be a sign of displacement of lower-income households. As higher-income households move into the city, it is likely to increase housing costs and displacement pressures for lower-income households. Cost burden has impacted renters more than homeowners. Renters are nearly three times as likely to be cost burdened than homeowners, with over a quarter of renters severely cost burdened, spending more than 50% of income on rent. In Vancouver, Black or African American households and Hispanic or Latino households experience the highest rates of cost burden and severe cost burden.

As the city continues to grow, managing negative externalities for groups who are already at a disadvantage will be critical to ensuring equitable opportunities. Anti-displacement strategies in vulnerable areas, targeted workforce development, culturally-specific and accessible small business support, and other intentional strategies should be developed and reinforced to avoid creating deeper disparities for communities of color and low-income residents.

Real Estate Trends

Billions of dollars in public realm improvements, transportation enhancements, and public private partnerships has catalyzed a cycle of private investment that has delivered new housing units and employment space across the city. Over the last fifteen years, Vancouver has added over 1 million square feet each of new office and retail space, and roughly 4 million square feet of industrial capacity. Developers have gravitated towards some of the city's large open sites, but created important questions for how Vancouver should seek to use its remaining buildable employment lands. Although the City has added 1,466 new housing units per year on average from 2012 to 2022 (many as part of large, mixed-use developments with 79% of new permits in multifamily developments over the last three years), the City still has a need to deliver more housing to meet demand (see the Housing Needs Assessment). Given finite amounts of land, which are expected to accommodate a large share of Clark County's employment growth in coming years, policy decisions around efficient land use are becoming more critical.

In recent years, Vancouver's commercial real estate trends have closely tracked Clark County and the broader Portland metro area, with several gaps closing for the city in the three years since the onset of the COVID-19 pandemic. Since 2020, office, retail, and industrial vacancies have climbed in the four-county area, while Vancouver's commercial vacancies remained lower in all categories. In 2023 year-to-date the region has over 11 percent of its office space vacant, compared to only 5 percent in Vancouver. While this rate has continued to increase from 2020 in the region, Vancouver and Clark County's office markets have recovered quickly. Retail and industrial vacancies do not show as sharp of a contrast but are maintaining lower vacancy rates and showed a quicker recovery from fluctuations in 2020.

Office market data indicates that Vancouver has established itself as the prime location for affordable office space within Clark County and the Portland metro area. While the city has lower office rents in comparison to the regional average, Vancouver's ability to attract tenants seeking lower cost options presents an opportunity for the city to strategically position itself as an attractive hub for new and expanding businesses, especially cost-conscious startups. Targeted initiatives to develop more modern office amenities, coworking spaces, small business incubators, "third places" (or social hubs facilitating social interaction outside of home or work such as cafes, parks, community centers), mixed-use development, and incentives for targeted office development could help the city capitalize on this competitive advantage in office real estate for service-based industries that continue to

grow in Vancouver. However, as post-COVID trends emerge, needs for startups and small businesses in particular may change as remote work offers a cost-effective alternative.[15]

Vancouver has an opportunity to develop mixed-use retail centers that could boost access to shopping, dining, and entertainment. While Vancouver's new retail construction (also referred to as 'deliveries') slowed in recent years, the city has also maintained growth in retail and service industry jobs. Areas of the city that saw falling employment include older suburban-style malls and plazas along highway corridors, while the city's downtown employment increased. Retail growth presents avenues to partner with developers on revitalization projects and initiatives to support local small businesses that are positioned to new post-pandemic trends that prioritize mixed-use commercial development.

Employment Trends

Service-based industries are concentrated in Vancouver and make up a large and growing share of the city's workforce. Healthcare, retail, and educational services represent the largest shares of employment in the city, with all service sectors as a whole accounting for more than half of jobs in the City. These represent areas where Vancouver can build on opportunities, although wages in many service-oriented careers are not on par with the County average. Developing industries that offer living-wage jobs should be a part of the City's strategy to provide economic opportunities for Vancouver residents, with pathways to these opportunities through upskilling or reskilling existing workers and fostering low-barrier educational programs.

Many of the largest employers in Clark County are based in Vancouver and represent key industry clusters in healthcare, technology, and education. Major employers like health centers, tech companies, and educational institutions represent key partners for developing

[15] The recently released Urban Land Institute's real estate trends report highlights emerging office space sector changes affected by remote work and other impacts (such as artificial intelligence). These changes have led to a reevaluation of the traditional office model and casted doubt on a complete return to pre-pandemic office conditions. ULI describes reduced tenant demand, particularly in downtown areas, resulting in a split market, with premium modern properties gaining favor. (ULI, 2024, Emerging Trends in Real Estate United States and Canada, https://knowledge.uli.org/reports/emerging-trends/2024/emerging-trends-in-real-estate-united-states-and-canada-2024?_gl=1*tyvb9f*_ga*ODQxOTExMjQ4LjE3MDAwNjk0NDM.*_ga_68JJQP7N7N*MTcwMDYxMTM3MS45LjEuMTcwMDYxMTM4Ni4wLjAuMAl).

career pathways and opportunities for residents of Vancouver and other parts of Clark County. Universities, hospitals, and technology parks are becoming increasingly important locations where people both work and develop skills for some of these major industries.

Jobs are moving in towards local employment hubs like Downtown Vancouver, the Vancouver Innovation Center, and large institutions. Employment trends at the census tract level show that employment is growing in these locations, while declining along older, suburban-style commercial areas like Fourth Plain Boulevard. While many cities (including Portland) have struggled to maintain Downtown areas post-pandemic, Vancouver is showing a stronger rebound than the region.

Policy Implications

The findings from this analysis can inform and guide the City as it develops its economic development strategies for the next twenty years. Some of the key policy implications from this work that the City may consider in the Comprehensive Plan update include:

Supporting employment and wealth creation opportunities for residents across all income levels. Demographic trends show an increase in younger, educated workers and high-income households, as well as a high-share of cost-burdened households. The City should evaluate strategies to continue supporting and attracting skilled workers to fill key roles in target industries, along with strategies to promote stability and opportunity for residents vulnerable to displacement and poverty.

Including housing as a focus of the City's economic development strategy. Access to talent is a primary driver of growth for many companies. A limited availability of housing and lack of affordable housing are issues not just for Vancouver residents but, increasingly, for employers who have difficulty attracting and retaining talent to fill roles. Historic and current housing underproduction has limited local supply (see Housing Needs Assessment), creating new pressures for residents including proximity to employment. The City should evaluate the dynamic between the industries they prioritize and the likelihood that the workers in those industries can afford to live in Vancouver. The City's housing and economic development efforts should be strategically coordinated to ensure the city has sufficient housing options to meet the needs of Vancouver workers and employers.

Coordinating with partners to support regional goals and target industries. The City should coordinate and align efforts with CREDC to support key industry clusters in Computer and Electronics, Clean Tech, Software, Metals & Machinery, and Life Sciences. The City should

coordinate with regional partners on key infrastructure projects and transportation improvements.

Pursuing place-based development strategies. The City's public realm investments will continue to catalyze private development in areas across the city. The City should continue to strengthen downtown as a residential, cultural, civic, retail and entertainment center. The City should develop targeted economic development and equitable development strategies, (e.g., culturally specific entrepreneurship business assistance programs) in neighborhood centers, in alignment with the future land use map and where the City is planning infrastructure investments.

Section 2. Demographic Profile

Population growth, demographic composition, and income distribution can all have important implications for a city's economic development. Key characteristics such as population growth over time, age of residents, median income, and disparities by race and ethnicity provide useful context about Vancouver's current households and recent trends. The purpose of this analysis is to evaluate the socioeconomic conditions that will influence demand for different land uses and shape the economic opportunities in the city over the current comprehensive plan horizon. This information can also help to identify which communities in Vancouver are not benefiting from current efforts and inform the City's work to address current gaps for equitable economic development as part of the comprehensive plan update.

This section provides an overview of key socioeconomic conditions in Vancouver that are useful for evaluating economic opportunities and challenges. To better understand the City's standing within the region, the analysis also includes comparisons to Clark County and other geographies such as Washington State and the greater Portland area as needed to contextualize conditions in Vancouver.

Data and Geographies

This assessment relies on published data primarily from the U.S. Census Bureau, CoStar, Washington Office of Financial Management, U.S. Department of Housing and Urban Development, Clark County, and the City of Vancouver (see the Our Vancouver Housing Needs Assessment for detail on the main data sources used). For demographic data, ECOnorthwest primarily used the 2021 American Community Survey (ACS) 1-year Estimates, which is the most current data set available. This report uses the City of Vancouver as its primary geography, with comparisons to Clark County and Washington State, as well as some targeted comparisons to other cities in the region, including Portland and Hillsboro. In some cases, the analysis uses a four-county area including Clark County (WA), Multnomah County (OR), Washington County (OR), and Clackamas County (OR) when necessary to understand regionwide economic trends.

Equity Priority Communities

The City has identified Equity Priority Communities, comprised of historically marginalized and/or vulnerable communities, that should be centered in Vancouver's planning and policy processes. These Equity Priority Communities are defined as those who experience or have experienced discrimination and exclusion based on identity. A history of housing discrimination and other exclusionary policies have deprived people in these communities of opportunities for wealth creation, access to capital, and access to quality affordable

housing in areas near essential amenities. For the purposes of this project, Equity Priority Communities include:

- Black, indigenous, people of color (BIPOC) communities
- People with low incomes
- People with disabilities, including neurodivergent
- Youth and children
- LGBTQ+ individuals
- Renters
- People without an address/ people experiencing homelessness
- Small business owners
- Refugees
- Undocumented population

Understanding disparities between these groups help the City make decisions on investments that meaningfully reverse the disparities in access to jobs, housing, transportation, and other community services. Where possible, this study disaggregates data by race to help understand disparities and inform future policy decisions.

Population Growth and Forecast

Population Growth

The Washington State Office of Financial Management provides official state and local population estimates and projections for use in the allocation of funds, growth management, and other planning functions. This section utilizes official population estimates from 2000-2022 and official projections for 2050 to understand Vancouver's past and future population growth.

Population growth and household formation are critical indicators for the available workforce and economic base of the city. Although Vancouver is part of an economically interconnected region, the rate of population growth in the city and county heavily influences future employment trends, local demand, and business competitiveness.

Vancouver and the region have grown substantially over the last two decades and are projected to continue to grow over the 20-year planning period. From 2000 to 2023, Vancouver's population grew by just over 56,000 residents, or 39%, which equals an annualized compounded growth rate of 1.4% growth per year (see Exhibit 8 below). At almost

200,000 persons, Vancouver is the fourth largest city, based on population, in the State of Washington (below the cities of Seattle, Spokane, and Tacoma but above Bellevue).[16]

Clark County has experienced a higher rate of population growth than Vancouver, though both are growing at a faster rate than the state overall. Despite Vancouver's slightly slower growth than the county, the city is likely to draw from a labor pool that includes commuters from unincorporated suburban areas and towns to the north, west, and east.

Exhibit 8. Population Growth, Vancouver, Clark County, and Washington, 2000-2023
Source: ECONorthwest, Office of Financial Management Population Estimates.[17]

	2000	2010	2023	Change, 2000-2023	% Change, 2000-2023	Annualized Compounded Growth Rate
City of Vancouver	143,560	161,791	199,600	56,040	39%	1.4%
Clark County	345,238	425,363	527,400	182,162	53%	1.9%
State of Washington	5,894,143	6,724,540	7,951,150	2,057,007	35%	1.3%

In-Migration

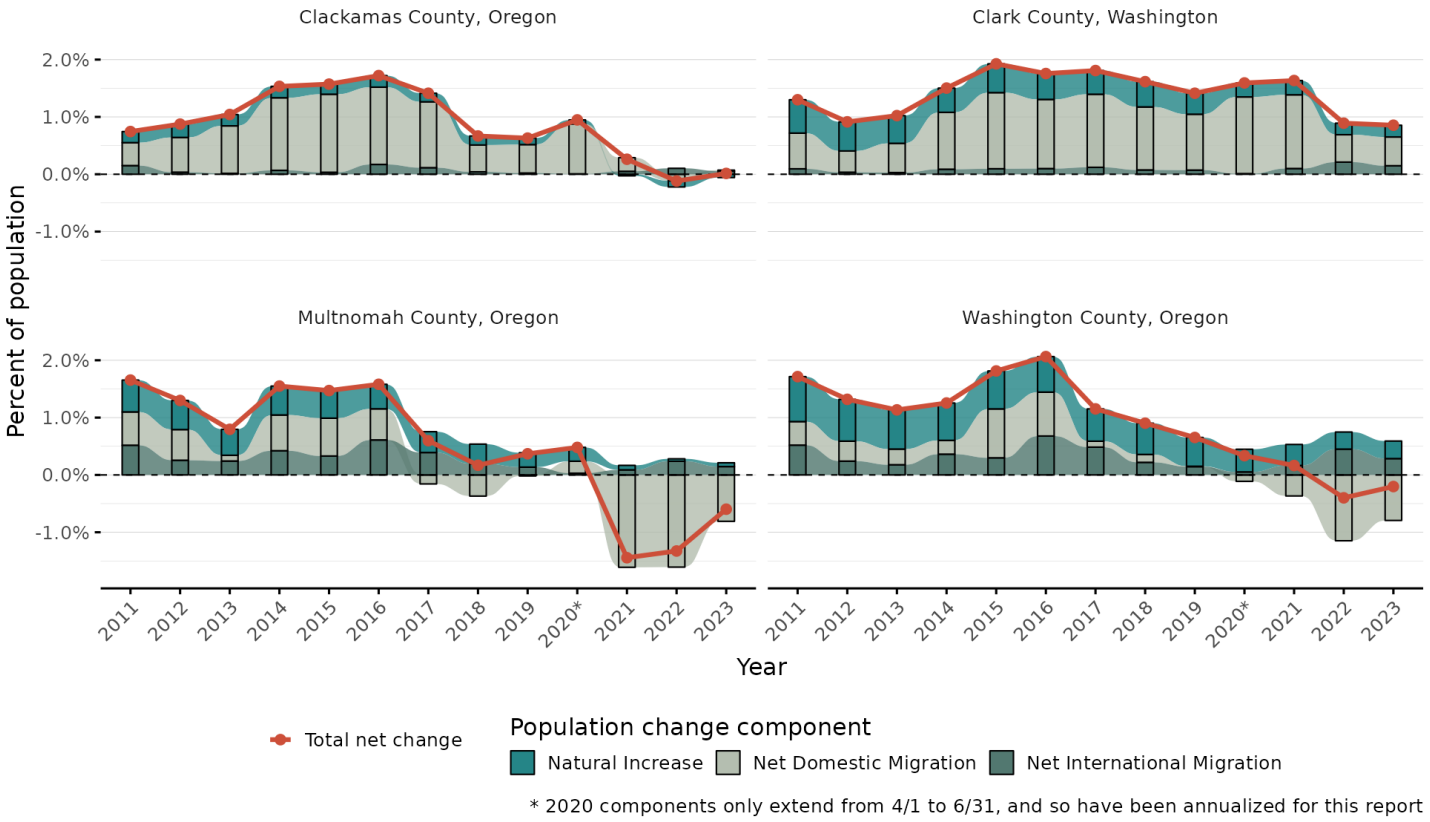
A portion of Vancouver's recent growth can be linked to migration from Multnomah County and other counties in the Portland Metropolitan region. From 2011 to 2021, Clark County has seen consistent rates of positive in-migration, with an average of approximately 5,000 people per year moving into the County. Meanwhile Oregon Metro Counties have all seen decreasing rates of in-migration since 2016, with a particularly high number of people moving out of Multnomah County in 2021. In 2021, nearly 13,000 people moved out of Multnomah county and approximately 5,800 people moved into Clark County. These findings suggest that the greater locational flexibility allowed post-COVID 19 is a contributing factor,

[16] Washington State Office of Financial Management analysis of U.S. Census data, 2021: https://ofm.wa.gov/washington-data-research/population-demographics/population-estimates/population-density

[17] Between 2010 to 2020, several areas were annexed into the City of Vancouver which increased the population by approximately 6,126 persons. If the annexation was deducted from the 2023 population estimate, the percent change would be 35% rather than 39%.

though not the singular cause, of migration trends from the Portland Metro region to Clark County.

Exhibit 9. Annual Population Change by County across the Portland Metro Region, 2011-2021
Source: U.S. Census



Demographic Composition

Demographic information describing the age and race and ethnicity trends of the community, can help inform both economic conditions today and key considerations for future economic development. ECONorthwest primarily used 2021 one-year American Community Survey (ACS) data (the most current data available) for this analysis.

Key Findings

- **The share of early and mid-career age residents and older adults in Vancouver is growing.** Vancouver's median age in 2021 was 39 years, similar to Clark County and increasing slightly since 2011. Vancouver's largest age group in 2021 was residents aged 20 to 34 years, representing roughly a quarter of the population (24%). Residents in this group are likely to include more early-career workers and students. From 2011 to 2021, the share of residents under 20 years decreased from 25% to 20%, while the share of residents older than 65 increased from 13% to 19%, indicating a decreased share of families with children and a greater share of

residents entering retirement (the Housing Needs Assessment also indicates that Vancouver's median household size has decreased slightly since 2011). Demographic trends will drive consumer preferences, housing needs and workforce composition. Specifically, more working-age young adults without children and more seniors are likely to drive demand for more compact housing types near amenities, services, and entertainment and recreational opportunities.

- **The share of residents over 25 with a bachelor's degree or higher increased in Vancouver and Clark County from 2011 to 2021.** An increasingly educated workforce may help the city in attracting and retaining employers that require workers with specific skill sets or educational backgrounds.
- **Both Vancouver and Clark County have become more racially and ethnically diverse.** From 2011 to 2021, Vancouver saw increases by two percentage points in its Hispanic and Latino population (from 9 to 11%), Asian population (from 6 to 8%), multiracial population (from 5 to 7%), and Black population (from 3 to 5%).
- **Disparities in median income, educational attainment, housing cost burden, and homeownership rates by race and ethnicity indicate ongoing economic inequality for people of color in Vancouver and Clark County.** In 2021, the median incomes of multiracial households, Black or African American households, Hispanic or Latino households, or households identifying as another group not listed by the ACS were below the median income in Vancouver; in addition, a smaller share of residents over the age of 25 who were Black or African American, Hispanic or Latino, or another race alone had bachelor's degrees. Housing cost burden was also most prevalent for Black or African American and Hispanic or Latino households, indicating additional economic burdens.

Age

Individuals often have different economic prospects and challenges at different stages of life. For example, young workers, students, and recent college graduates who are in the early stages of their careers may have greater locational flexibility, while mid- to late-career workers may be less likely to change careers, and retirees and older adults exiting the workforce may have changing needs for housing, amenities, and services.

Compared to Clark County overall, Vancouver has a greater share of working-age young adults and seniors, and a lower share of residents under 20 years of age. Exhibit 10 shows the median age for Vancouver and Clark County. Vancouver has a marginally higher median age, 39.4 years, than the county overall.

Exhibit 10. Median Age, Vancouver and Comparison Geographies, 2021
Source: ACS 1-Year Data Tables, 2021

Jurisdiction	Median Age
City of Vancouver	39.4
Clark County	39.2
Hillsboro	34.8
Portland	38.3
State of Washington	38.2

Exhibit 11. Change in Median Age, Vancouver and Comparison Geographies, 2011-2021
Source: ACS 1-Year Data Tables, 2011, 2021

Jurisdiction	2011	2021	Change
City of Vancouver	38.0	39.4	1.4
Clark County	37.0	39.2	2.2
Hillsboro	32.2	34.8	2.6
Portland	35.7	38.3	2.6
State of Washington	37.3	38.2	0.9

Exhibit 11 shows the change in median age from 2011 to 2021. Vancouver's median age increased by 1.4 years from 2011 to 2021, a slightly lower change than the county.

Exhibit 12 shows the distribution of different age groups. In Vancouver, the largest age group is residents aged 20 to 34 years (24%). Compared to the county, Vancouver has a similar share of residents between the ages of 35 and 64, but a 3-percentage-point higher share of residents 65 years and older (or nearly 19% share higher than the County). In addition, while the county's largest age group is residents under 20 years (25%), Vancouver has a 5-percentage-point lower share (or 20% lower share than that of the County).

Exhibit 12. Age Distribution, Vancouver and Comparison Geographies, 2021
Source: ACS 1-Year Data Tables, 2021

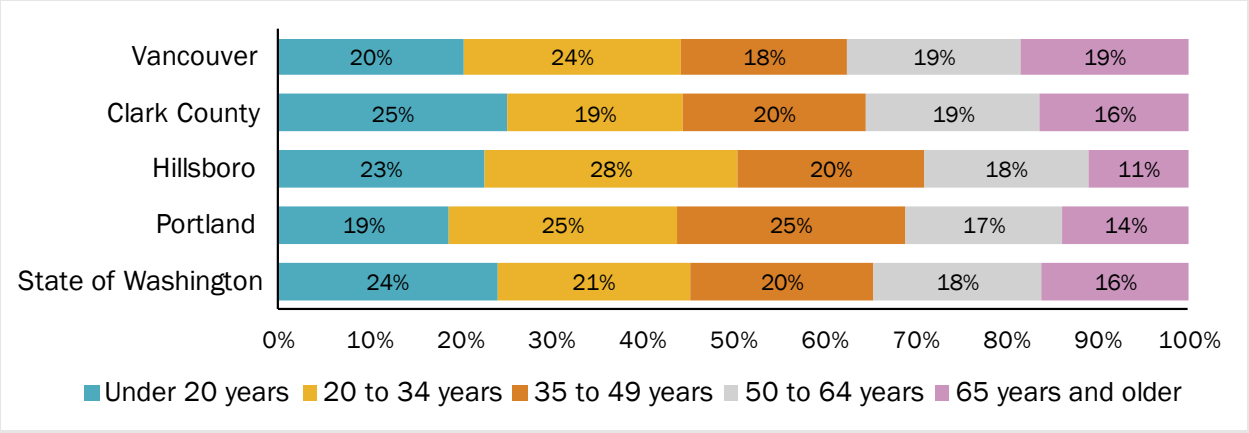
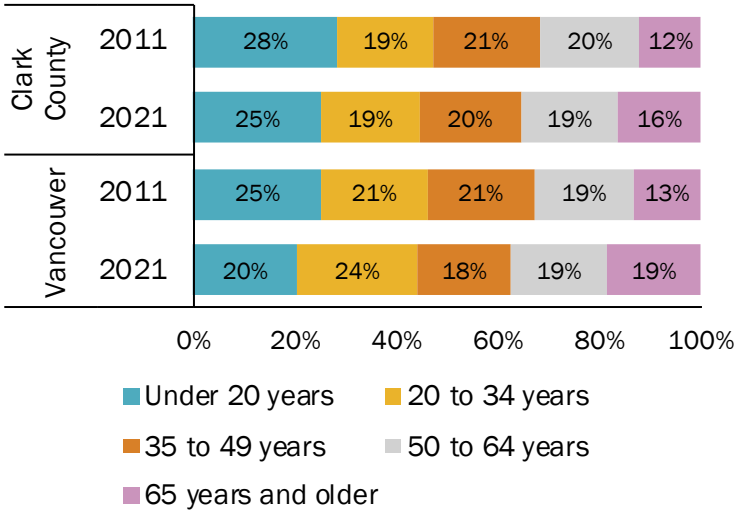


Exhibit 13 shows the change in age distribution for Vancouver and Clark County. In both jurisdictions, the share of residents under 20 years decreased (by 5 percentage points in Vancouver). On the other end of the spectrum, the share of residents 65 years and older increased in both jurisdictions (by 6 percentage points in Vancouver). In the county overall,

the share of residents between 20 and 65 years remained relatively stable, while in Vancouver the share of residents aged 20 to 34 years increased by 3 percentage points, and the share of residents aged 35 to 49 years decreased 3 percentage points.

Exhibit 13. Change in Age Distribution, Vancouver and Clark County, 2011-2021
Source: ACS 1-Year Data Tables, 2011, 2021

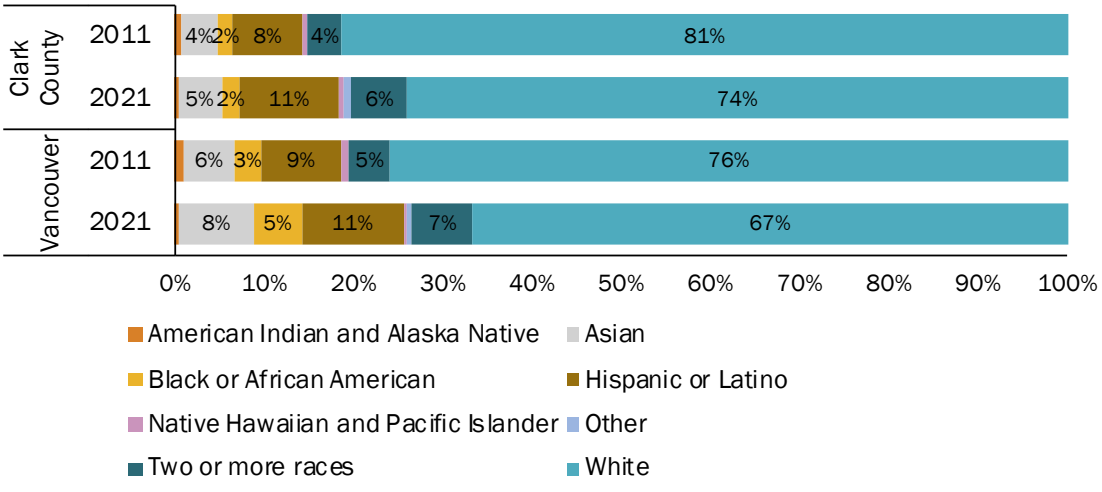


In addition, prime working age is generally defined as workers aged between 25 to 54 years. Vancouver's share of prime working population (20 to 49 years) is similar to Clark County and has slightly decreased from 2011 to 2021.

Race and Ethnicity

In both Vancouver and Clark County, the majority of the population is White, with 67% of residents identifying as White in Vancouver and 74% in the county. However, Vancouver has a 3-percentage-point higher share of Black or African American residents, and a 3-percentage-point higher share of Asian residents than the county overall. **Both jurisdictions became more racially and ethnically diverse over the last decade from 2011 to 2021.** Vancouver saw increases by two percentage points for its Hispanic and Latino population (from 9 to 11%), Asian population (from 6 to 8%), multiracial population (from 5 to 7%), and Black or African American population (from 3 to 5%). Exhibit 14 shows the change in the distribution of residents by race and ethnicity from 2011 to 2021.

Exhibit 14. Change in Race and Ethnicity Distribution, Vancouver and Clark County, 2011-2021
Source: ACS 1-Year Data Tables, 2011, 2021

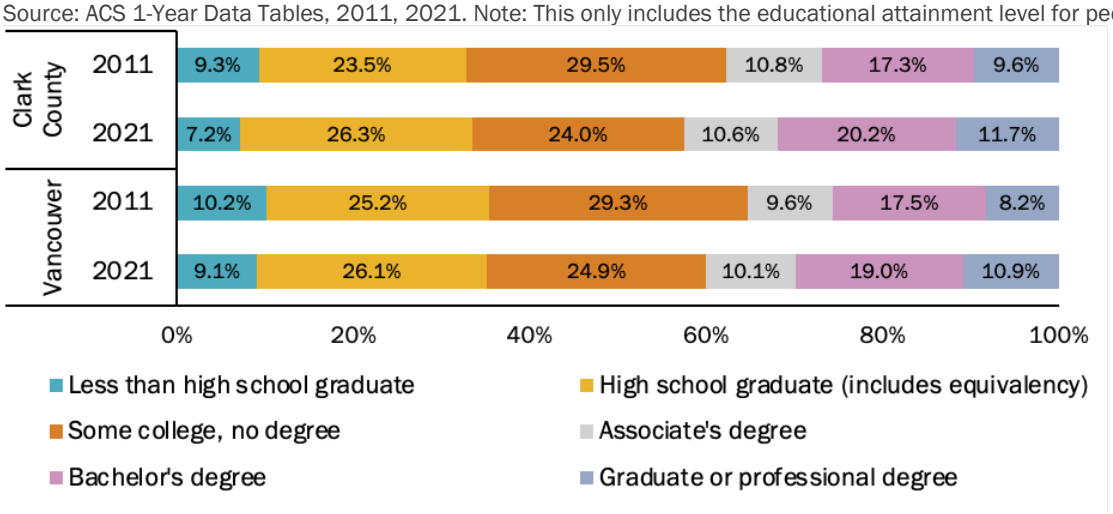


Educational Attainment

Educational attainment is an important indicator for economic opportunities and the type of available workforce in an area. Economic development strategies may target different types of skill development, industry pipelines, or training programs depending on the existing level of education among residents.

From 2011 to 2021, Vancouver and Clark County both saw growth in the share of residents over 25 with a bachelor's degree or higher. The share of residents with some college but no degree and those with no high school degree also decreased across both geographies in this timeframe. An increasingly educated workforce may help the city in attracting and retaining employers that require workers with specific skill sets or educational backgrounds. As professional services industries grow in Vancouver, the city will see increasing opportunities for skilled workers in industries like financial services. Industries like specialized manufacturing, life sciences, and healthcare also present opportunities for those with associate degrees or graduates from Career and Technical Education programs to access higher wage jobs.

Exhibit 15. Change in Educational Attainment, Vancouver and Clark County, 2011-2021
Source: ACS 1-Year Data Tables, 2011, 2021. Note: This only includes the educational attainment level for people 25 years and over.

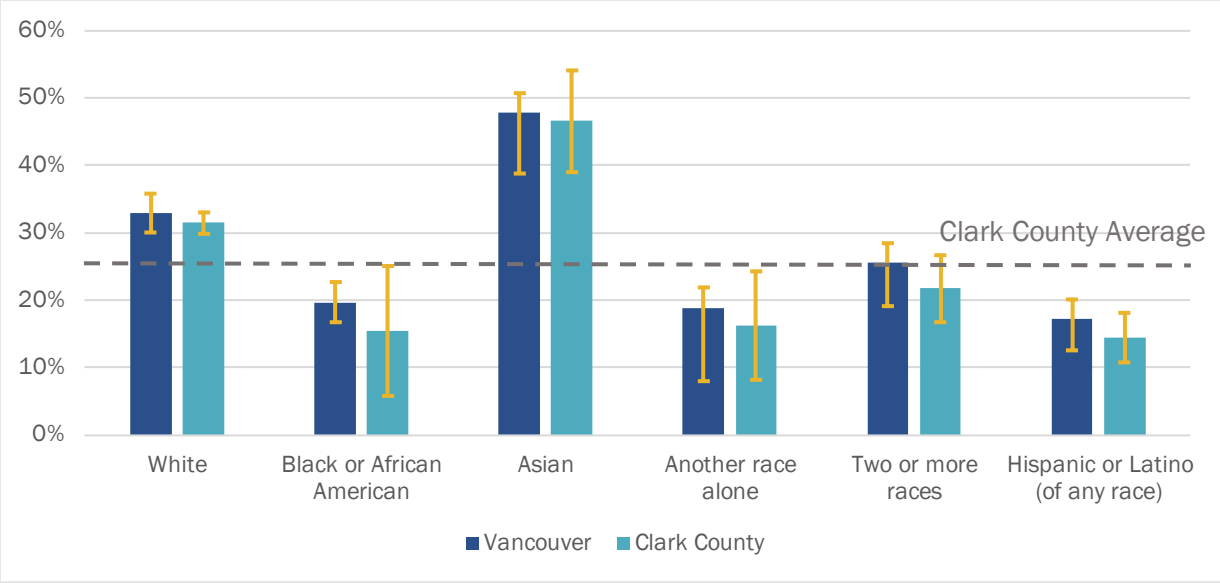


Educational attainment is not the same between different groups by race and ethnicity in Vancouver or Clark County. For the population age 25 and over, a larger share of white and Asian residents held at least a bachelor's degree, which often indicates different types of employment opportunities in the workforce. In comparison, a lower share of residents who

were Black or African American, Hispanic or Latino, or another race alone had bachelor's degrees both in Vancouver and Clark County.

Exhibit 16. Share of Population Age 25 and Over with a Bachelor's Degree or Higher by Race and Ethnicity, Vancouver and Clark County, 2021

Source: ACS 1-Year Data Tables, 2021. Note: Due to low sample size, accurate data is not available for American Indian and Alaska Native and Native Hawaiian and Other Pacific Islander groups. Yellow bars represent the range of margin of error (MOE).



Income Distribution

Income and income distribution are critical indicators of economic prosperity. Income levels directly reflect the purchasing power and standard of living of individuals and households; higher incomes generally enable people to afford better education, healthcare, and access to essential goods and services, contributing to overall well-being and productivity. The distribution of income and disparities between demographic groups are also critical considerations for addressing economic inequality and reducing concentrations of poverty. Key findings for income distribution in Vancouver include:

- **Median household income in Vancouver is increasing.** In Vancouver and Clark County, the share of all income brackets above $75,000 increased between 2011 and 2021, while the share of households earning less than $75,000 annually decreased. While an increase in median household income can have positive compounding effects throughout the regional economy, it can also be a sign of displacement of lower-income households and compounding economic burdens on populations who have been historically disadvantaged.
- **However, incomes in Vancouver are still lower than elsewhere in Clark County.** Vancouver had a median household income of $70,000 in 2021, which is lower than the median household income in Clark County. Comparatively, Vancouver had a

higher share of households earning less than $75,000 and a lower share of households earning more than $100,000 annually.

- **Vancouver median household incomes generally align with the Portland region Area Median Income (AMI).** However, compared to the larger region, Vancouver has a higher share of households earning below 60% of the AMI.

Median Household Income

As of 2021, the median household income in Vancouver was roughly $70,000 per year. The city's median household income was approximately $14,000 lower than that of Clark County as a whole, which includes cities like Ridgefield, Camas, and Washougal that have seen substantial population growth and corresponding increases in median household income in recent years. A variety of socioeconomic factors may contribute to this disparity between the City of Vancouver and other geographies in the region such as educational attainment levels, employment trends, and disparities for groups who have been historically disadvantaged. For instance, incomes in Hillsboro are likely higher due to high concentrations of high-wage tech industry jobs in the Hillsboro Industrial Area.

Exhibit 17. Median Household Incomes, Vancouver and Comparison Geographies, 2021
Source: ACS 1-Year Data Tables, 2021

Jurisdiction	Median Household Income
City of Vancouver	$70,000
Clark County	$84,000
City of Hillsboro	$97,000
City of Portland	$79,000
State of Washington	$84,000

Even after adjusting for inflation, the City of Vancouver and Clark County both saw increases in median household income from 2011 to 2021 (as shown in Exhibit 18). Vancouver's median household income increased roughly $15,500 over this time period increasing by 28% which is slightly lower than Clark County (at 33%). The areas surrounding Vancouver tend to include a larger share of higher income households and lower share of people of color.

Household Income Distribution

Exhibit 19 shows the distribution of different income brackets in Vancouver and Clark County. Of these jurisdictions, **Vancouver has a higher share of residents in income brackets below $75,000 annually**. Vancouver's share of households earning below $75,000 per year is even higher than the State of Washington and the City of Portland. In Vancouver, 53% of all households earn $75,000 or less, compared to 44% in Clark County (9 percentage points higher). Compared to Clark County, Vancouver's share of households earning less than $25,000 is five percentage points higher than the county. Looking at the higher income brackets, Vancouver has a lower total share of households earning above $75,000 per year (47% compared to 56%). In particular, the city has a smaller share of households earning between $100,000 and $150,000 than the county (17% compared to 21%), and a smaller share by 5 percentage points of households earning more than $150,000 compared to the county overall.

Exhibit 18. Change in Median Household Incomes, Vancouver and Comparison Geographies, 2011-2021 (2021$)
Source: ACS 1-Year Data Tables, 2011, 202. Note: 2011 incomes are adjusted for inflation to 2021 dollars.

	2011	2021	Change	% Change
City of Vancouver	$58,918	$69,993	$11,075	28%
Clark County	$68,250	$83,837	$15,587	33%
City of Hillsboro	$79,219	$97,436	$15,781	20%
City of Portland	$56,658	$79,057	$18,217	32%
State of Washington	$68,466	$84,247	$15,587	23%

Exhibit 19. Median Household Income Distribution, Vancouver and Comparison Geographies, 2021
Source: ACS 1-Year Data Tables, 2021

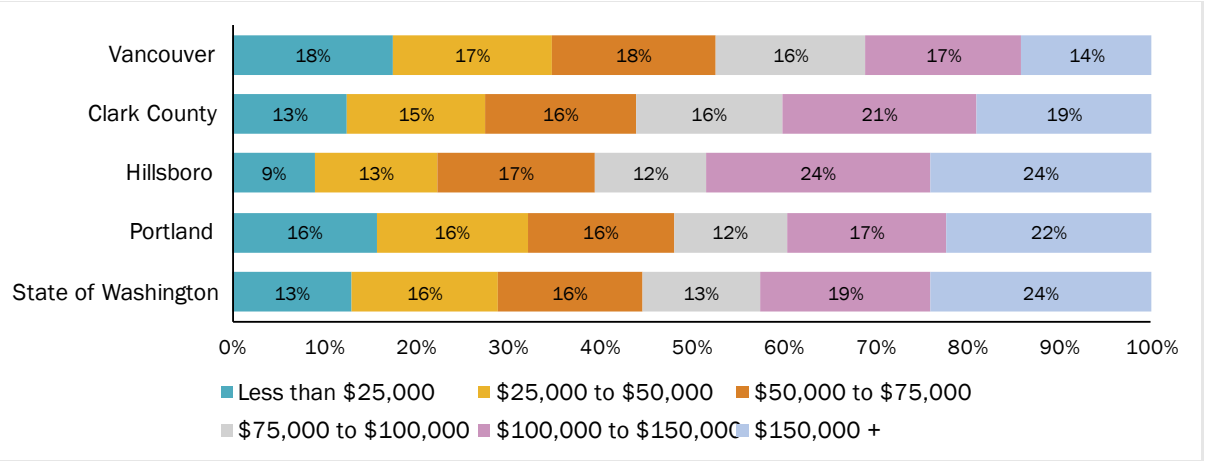
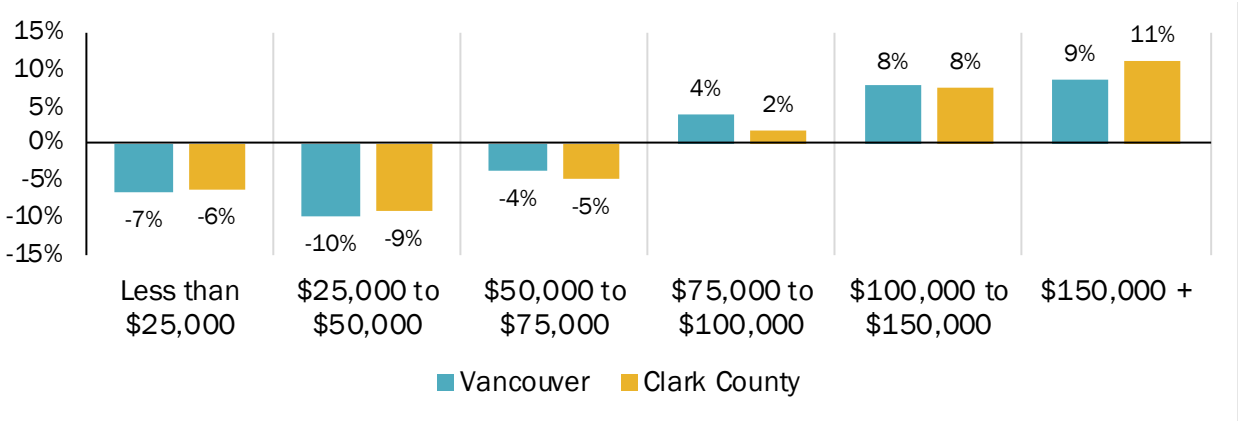


Exhibit 20 shows the change in the *share* of each income bracket from 2011 to 2021; for example, the share of households earning more than $150,000 annually increased from 5% to 14% in Vancouver over this time period, an increase of 9 percentage points. **In both Vancouver and Clark County, the share of households earning less than $75,000 annually decreased, while the share of all income brackets earning above $75,000 increased.** This could indicate that the City of Vancouver is gaining more people with household incomes earning above $75,000 per year or that existing households are experiencing increases in their incomes. Also in both jurisdictions, the share of households earning between $25,000 and $50,000 decreased the most, while households earning more than $150,000 increased the most. While changes were similar between the city and the county, the county had a slightly higher change in the share of households earning greater than $150,000.

Exhibit 20. Change in Median Household Income Distribution, Vancouver and Clark County, 2011-2021
Source: ACS 1-Year Data Tables, 2011, 2021



An increase in median household income can have positive compounding effects throughout the regional economy. Greater spending power for households can result in more revenue for local businesses, and more local government tax revenue for public services and programs. However, an increasing median household income can also be a sign of displacement of lower-income households. As higher income households move into the city, it is likely to increase housing costs and displacement pressures for lower-income households.

Income Inequality

Inequality between individuals and households with high incomes and those with low incomes in a community is helpful to understand how to best target economic development strategies to reduce disparities. Tracking income inequality allows decisionmakers to identify trends and emerging areas of concern so they can take steps to address root causes and create more equitable opportunities for residents. As Vancouver sees an influx of high-income households and rising median income, it is critical to track this variance between new high-earning and lower income residents. There are several ways that income inequality can be measured, including the Palma Ratio included in this section.

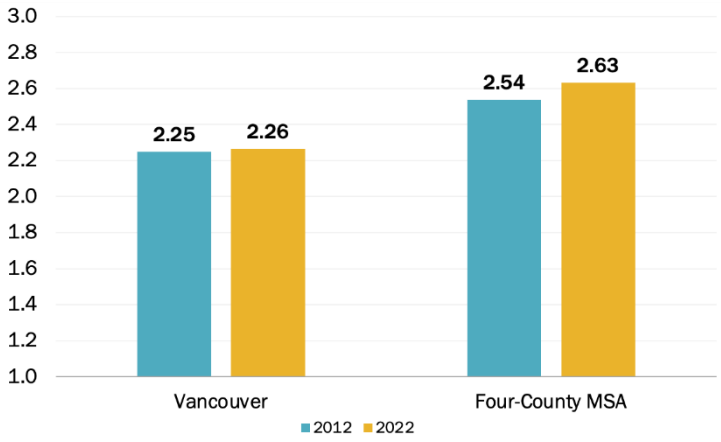
Palma Ratio

The Palma Ratio is one method of measuring income inequality that is defined as the ratio of income at the top 10 percent of households relative to that of the bottom 40 percent. This ratio is calculated by comparing the total income of households in both groups.[18] A higher score indicates greater income inequality between the top 10 percent and bottom 40 percent of households. A Palma Ratio greater than 1.0 indicates that the top 10% of the population being measured holds a larger share of income compared to the bottom 40% of the population while a ratio less than 1.0 implies the opposite (that the bottom 40% holds more income or wealth than the top 10%).

The Palma Ratio has consistently been higher in Clark County compared to the City of Vancouver for a decade from 2012 to 2022 (in 2022, it was 2.26 in the city and 2.63 in the county) (Exhibit 21). Vancouver saw a minor increase in its Palma Ratio score between 2012 and 2022, while the four-county area (including Clark, Multnomah, Clackamas, and Washington Counties) saw a larger increase than the city from 2.54 to 2.63 (by 0.09).[19] This indicates that Vancouver did not see a sizable change in inequality between its highest and lowest income levels, while disparities grew more in the four-county area overall. This could indicate a combination of stagnant or shrinking wages for the area's bottom 40 percent of households or disproportionately higher growth for the top 10 percent.

Exhibit 21. Palma Ratio, Vancouver and Four-County Area (Clark County, WA; Multnomah County, OR; Clackamas County, OR; Washington County, OR), 2012-2022

Source: ACS PUMS 1-Year Estimates, 2012, 2022.



[18] Alex Cobham, "The Palma," The Uncounted, December 8, 2014, https://uncounted.org/palma/.

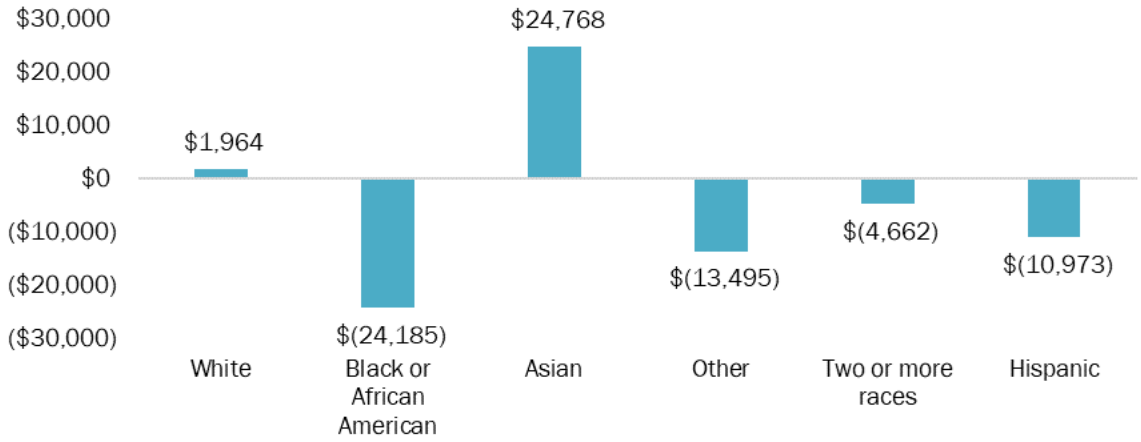
[19] Calculating the Palma Ratio requires analysis of PUMS data, which provides more detail about income brackets than the American Community Survey (ACS). PUMS data uses of Public Use Microdata Area (PUMA) geographies, which do not have the same geographic alignment as the ACS. Given the overlap of PUMAs in Clark County, this analysis compares Vancouver with the four-county area.

Income and Race

Exhibit 22 shows the difference for median incomes from the overall median income by race for Vancouver. Disparities were highest for Black or African American households, Hispanic households, Multiracial households, and households in the Other race category, whose median incomes were below the median household income for the City, while the median incomes of White and Asian households were above the median income of the city. These disparities highlight the importance of targeted, culturally-specific economic development strategies aimed at serving those communities where there is the greatest need for economic mobility and wealth creation opportunities.

Exhibit 22. Difference between Median Income by Race and Overall Median, Vancouver

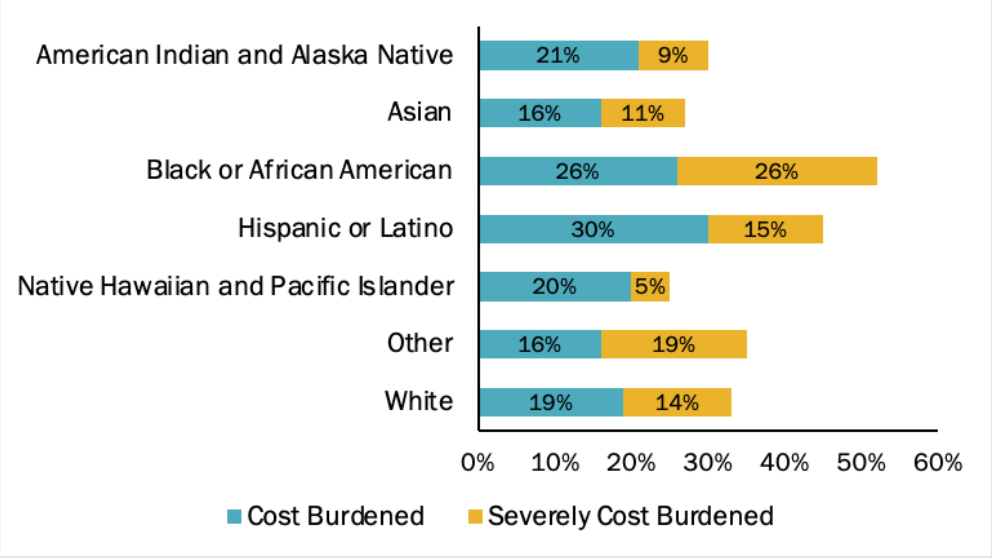
Source: ACS 5-year estimates 2017-2021. Note: Due to low sample size, accurate data is not available for American Indian and Alaska Native and Native Hawaiian and Other Pacific Islander groups.



Housing Characteristics and Race

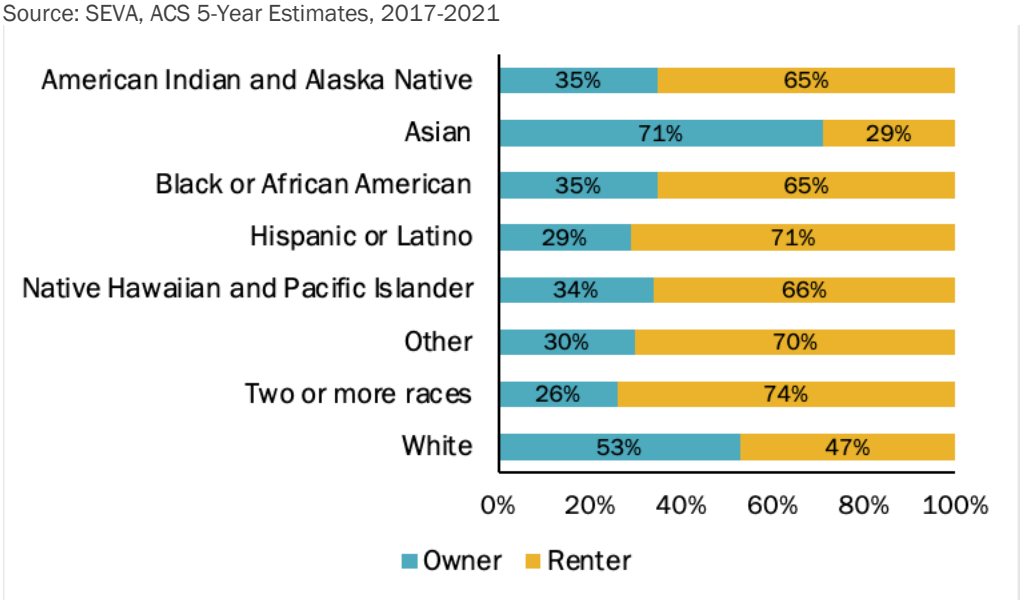
Disparities in housing cost burden can also indicate economic inequality The US Department of Housing and Urban Development guidelines describe 'cost burden' as a household spending 30 percent or more of their monthly income towards a mortgage, rent, utilities, and other housing costs, while 'severe cost burden' describes households paying 50 percent or more of monthly income towards those expenses. In Vancouver, cost burden was most severe for Black or African American and Hispanic or Latino households, indicating additional economic burdens on these households.

Exhibit 23. Cost Burden by Race, Vancouver, 2021
Source: SEVA, American Community Survey 5-Year Data Tables, 2017-2021
Note: 'Cost burdened' here refers to households spending between 30-49% of household income for housing costs. 'Severely cost burdened' refers to households spending 50% or more of household income for housing costs.



In the City, White and Asian households are also more likely to own their homes compared to householders who are Black or African American, Hispanic or Latino, American Indian and Alaska Native, Native Hawaiian and Pacific Islander, two or more races, or another race. Higher rates of homeownership can indicate greater stability for households.

Exhibit 24. Household Tenure by Race and Ethnicity, Vancouver, 2021
Source: SEVA, ACS 5-Year Estimates, 2017-2021



Section 3. Economic Profile

Employment Growth

In 2021, Vancouver was home to nearly 100,00 jobs. The number of jobs in Vancouver has increased rapidly between 2011 and 2021, growing from 77,846 jobs in 2011 to 99,057 jobs in 2021. This increase of 21,211 jobs means that Vancouver has gained an average of 2,121 jobs per year from 2011 to 2021.

Employment Density

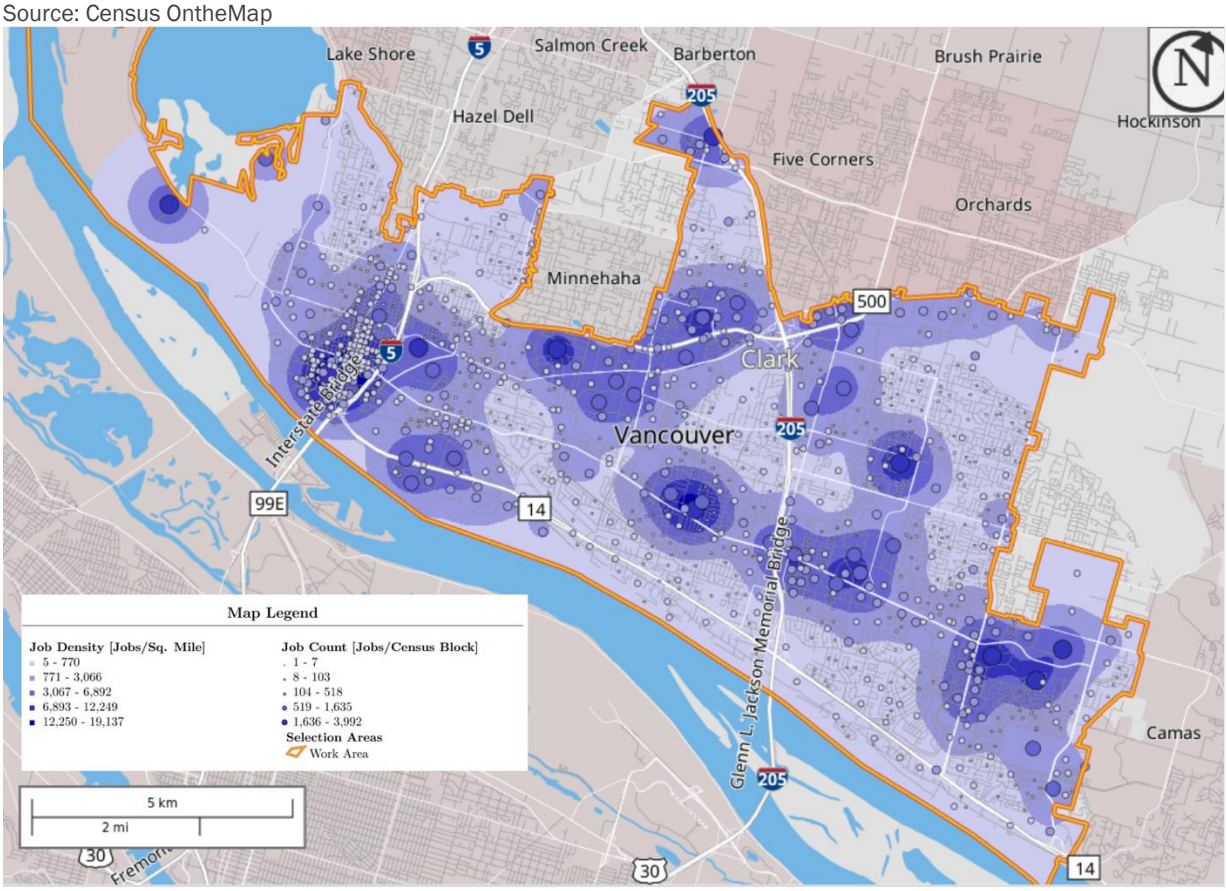
The City of Vancouver has several employment centers dispersed throughout the city supporting a higher concentration of jobs (see Exhibit 25 below). Vancouver's downtown area located near I-5 has the most intensive concentration of employment, with other centers around major employers like Clark College, the Port of Vancouver on the waterfront, PeaceHealth medical facilities along Mill Plain Boulevard, the Vancouver Mall and other strip shopping centers along WA-500, and technology and innovation hubs such as Vancouver Innovation Center (VIC) on the east side.

Understanding where employment is clustered and where job densities are growing can help inform employment capacity planning, where to target infrastructure investment and transit service, and can shape land use policy decisions. Public transit becomes more efficient and cost-effective as density levels in transit corridors increase and become more optimal to support transit service ridership. In addition, it is most efficient to coordinate job clusters to be located near housing that would best serve working age population needs.

LEHD Origin-Destination Employment Statistics (LODES) data used to analyze employment density does not fully account for remote workers, since it registers the location of an employer by address but "does not have information to determine whether a job is remote work or whether the worker physically travels to this location for the worker's regular duties. Some workers may never physically attend the employment location while others may go irregularly, and a worker's travel situation may change from year to year."[20] In many cases, employers may have full or partially remote workers whose jobs are counted at their physical location.

[20] US Census Bureau, "OnTheMap Help and Documentation," https://lehd.ces.census.gov/applications/help/onthemap.html#!faqs#25.

Exhibit 25. Counts and Density of All Jobs, Vancouver, 2020
Source: Census OntheMap



Commute Patterns

Regional commuting patterns and workforce trends are interconnected and changing. Employment trends and commuting patterns can provide insight on the needs of workers today and into the future. Employment plays an important role in where people live, and it can influence where people move. If the data show that many people are commuting into the city for work, it could indicate that the city does not have enough housing to accommodate its workforce or enough housing that meets their needs and affordability levels.

Prior to the COVID-19 pandemic, many workers traveled to in-person jobs located in central business districts five days a week. Current trends allow for greater locational flexibility and a variety of hybrid schedules, although commute distances can still impact where residents can seek employment opportunities. As such, jobs that require some level of in-person work may be more or less accessible to potential workers depending on the distance from residential areas.

This section describes the commute patterns of Vancouver residents and workers. The neighboring jurisdictions and unincorporated areas included in these data are those where people made the most trips to and from Vancouver. These areas, referred to in this section as

"comparison geographies", include Portland, Hillsboro, Gresham, Camas, Battle Ground, Wilsonville, Milwaukie, Camas, Hazel Dell, Salmon Creek, and Beaverton. This analysis is limited to jurisdictions and unincorporated areas in Clark County and adjacent counties to control for primarily in-person commuting and to avoid capturing fully remote workers who may live a farther distance from Vancouver.

Key findings for commuting patterns include:

- **About a third of Vancouver workers live in Vancouver –a higher share of workers who both live and work in the city (34%) than all nearby jurisdictions except Portland.** Vancouver's residents are more likely to work in Vancouver than surrounding geographies. Vancouver workers are also more likely to be residents of Vancouver than any other single location in the area.[21]

- **Since 2010, the size of Vancouver's workforce and population has grown overall, while the share of people who commute to and from the city has stayed about the same, indicating that Vancouver has proportionately attracted both residents and workers** (see Exhibit 28 and Exhibit 29 below). In 2020, Vancouver had the second largest workforce among comparison geographies, after Portland. This grew 26% since 2010, with a slight dip from 2019 to 2020 in total workers and residents. This may indicate larger economic and population trends during the onset of the COVID-19 pandemic.
- **The second largest workplace destination for Vancouver residents is Portland and the second largest home destination for Vancouver workers is unincorporated Clark County.** The share of workers commuting from Vancouver to other destinations in Clark County increased since 2010.
- **Vancouver workers and residents had relatively short commutes in 2020 compared with other regional cities**. Of comparison geographies, workers commuting to Vancouver had the second shortest commute in 2020 (after Beaverton), and residents commuting from Vancouver had the fourth shortest distance in 2020 (with Beaverton, Milwaukee, and Portland residents all having shorter commutes). The average commute distance for Vancouver residents was 10.8 miles in 2020, while

[21] In comparison, the City of Seattle has around 64%, the City of Spokane has nearly 55%, the City of Bellevue has almost 24%, and the City of Tacoma has almost 30% of persons living and working in the same city in 2020.

the average distance for workers at jobs in Vancouver was just over 11 miles – the second shortest among comparison cities.

- **Vancouver workers commuting for work tend to live in areas further north of the City**. In contrast, Vancouver residents commuting to work tend to commute to destinations south of Vancouver such as to Portland, Gresham, and Tigard (see Exhibit 26 and Exhibit 27 below).

Vancouver is part of a connected regional economy, with residents of the city working in different locations across Clark and surrounding counties (particularly in Portland). Vancouver is also an important contributor to this regional economy through its major institutions and employment hubs. The city draws in workers from across the area, with commuters traveling from suburban areas of Clark County and beyond.

The maps below depict two-dimensional density regions, which are broken out into four tiers. These can be best described as representing the smallest area that can contain 99%, 95%, 80%, and 50% of all commutes to or from Vancouver. These types of cartographic representations are best used as generalizations of spatial concentrations of points, and since these percentage values can often be confusing or abstract for the general reader, we have re-labelled them to "High" and "Low" at the 99% and 50% tiers.

Exhibit 26. Workplace Location of Vancouver Residents, 2020
Source: LODES, 2010-2020

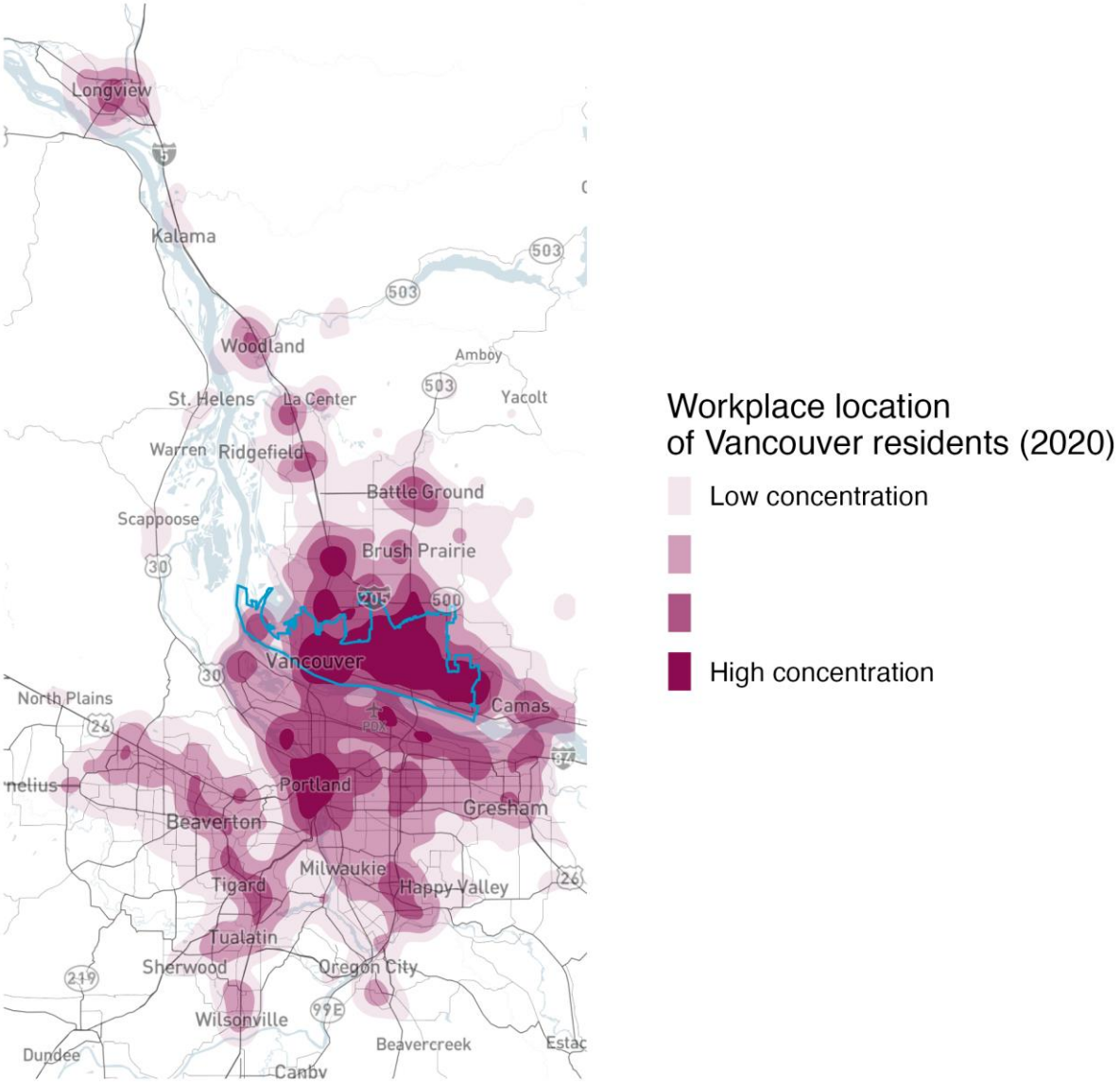
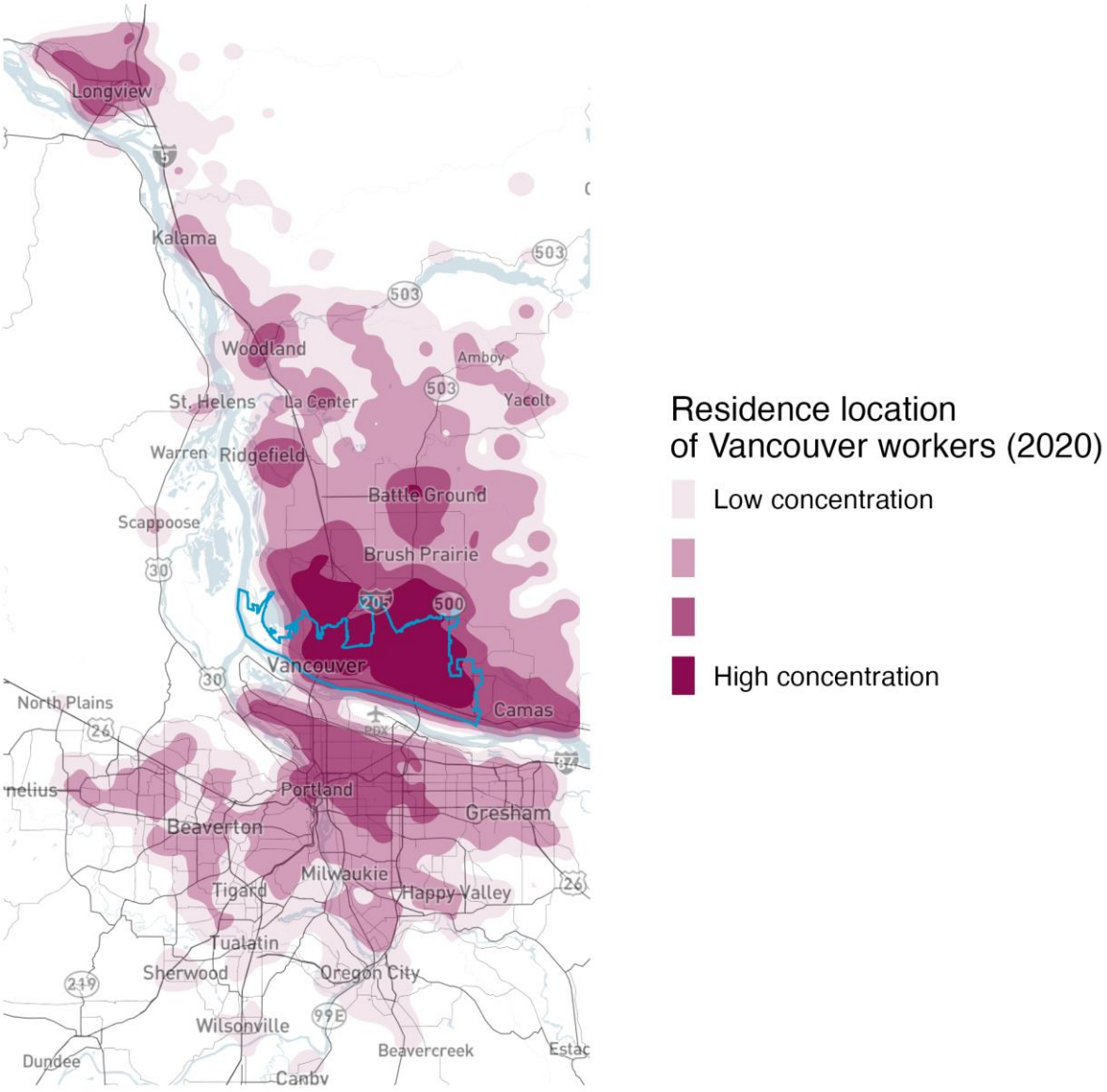
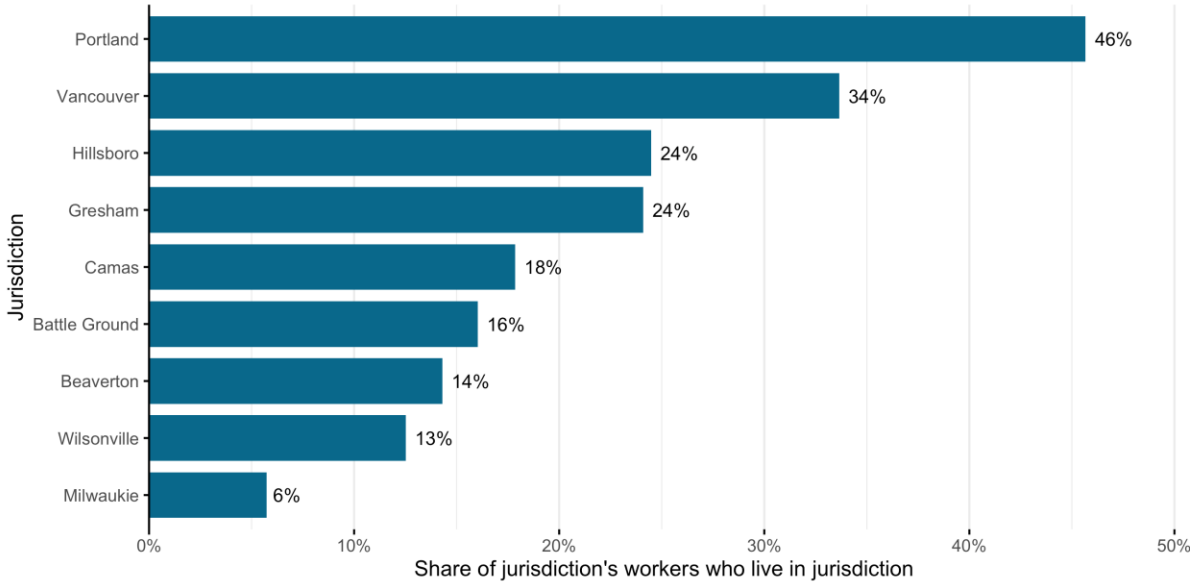


Exhibit 27. Residence Location of Vancouver Workers, 2020
Source: LODES, 2010-2020



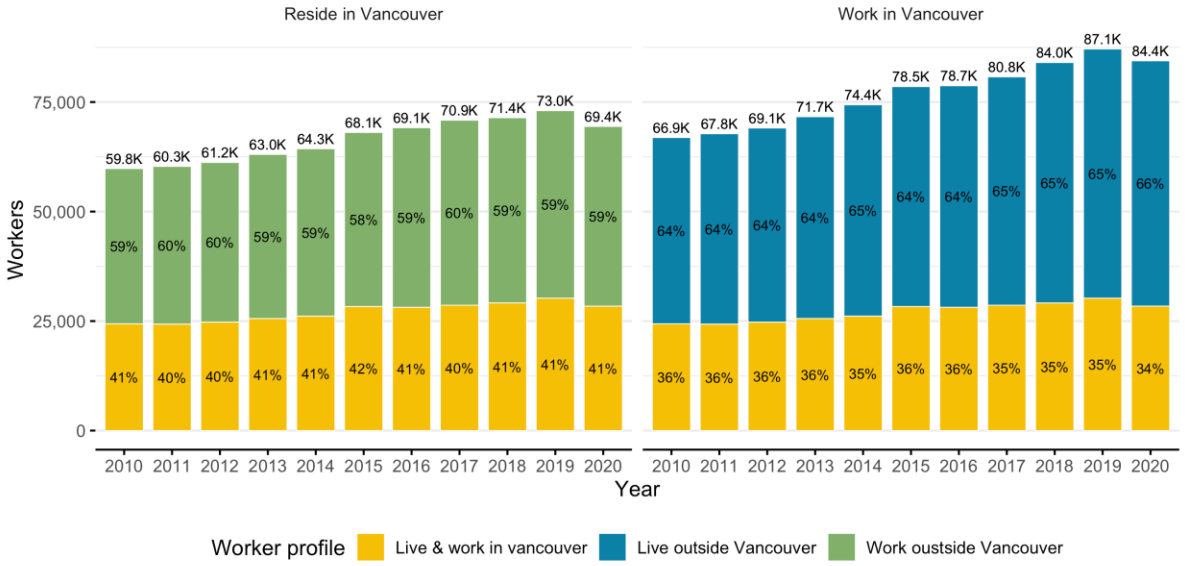
Of comparison geographies in the region, Vancouver had the second largest share of workers who both live and work in the city (34%) after Portland in 2020 (see Exhibit 28 below). Other cities and towns in the area saw much lower shares of workers who lived within the same location, particularly smaller jurisdictions to the south of Portland like Milwaukie and Wilsonville.

Exhibit 28. Share of Workers Living and Working in the Same Jurisdiction, Vancouver and Surrounding Cities, 2020
Source: LODES, 2010-2020



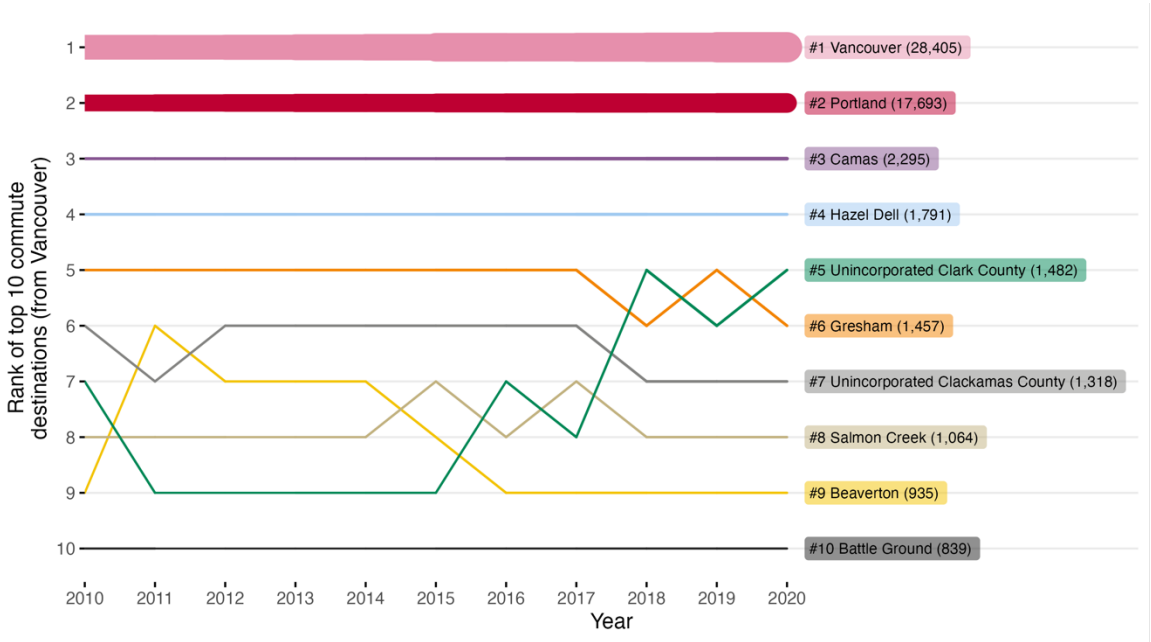
In Vancouver, the total number of both residents and workers grew overall between 2010 and 2020 (with a slight decline in 2020 from previous years), as shown in Exhibit 29. The share of the population both living and working in the city remained about the same from 2010 to 2020, indicating that Vancouver has proportionately attracted both groups. In 2020, Vancouver had 84,413 workers, the second largest workforce among comparison geographies in this analysis, after Portland (with 396,692 workers in 2020). This grew 26% since 2010, from 66,898 to 84,413 workers (by 17,515 workers). However, in 2020 the city saw a slight decline in both residents and workers for the first time in the ten-year period. This may indicate larger economic and population trends during the onset of the COVID-19 pandemic, including a national spike in unemployment, an increase in early retirements, and relocation in response to greater locational flexibility.

Exhibit 29. Share of Residents and Workers Living and Working in Vancouver, 2010-2020
Source: LODES, 2010-2020



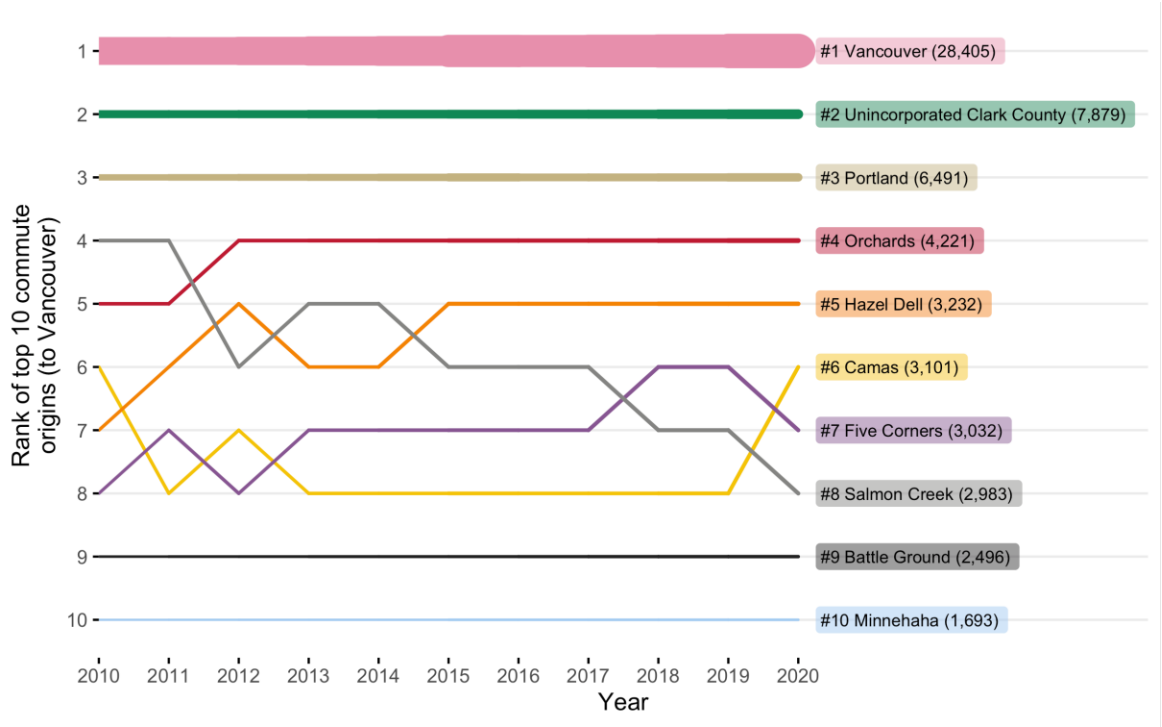
Vancouver's residents are more likely to work in Vancouver than any other single location in the area. The second largest *destination* for Vancouver residents is Portland, followed to a lesser extent by Camas, Hazel Dell, and unincorporated Clark County (Exhibit 30). Top destinations have remained steady since 2010, although the share of workers commuting to destinations in Clark County increased.

Exhibit 30. Top Commute Destinations from Vancouver, 2010-2020
Source: LODES, 2010-2020
Note: Heavier line weights indicate the larger number of commuters shown in parentheses on the right of each destination.



Vancouver workers are also more likely to be residents of Vancouver than any other single location in the area. Residents of unincorporated Clark County are the largest group of workers *commuting into* Vancouver, followed closely by those working in Portland (Exhibit 31). To a lesser extent, workers also commuted from smaller cities in Clark County and surrounding counties.

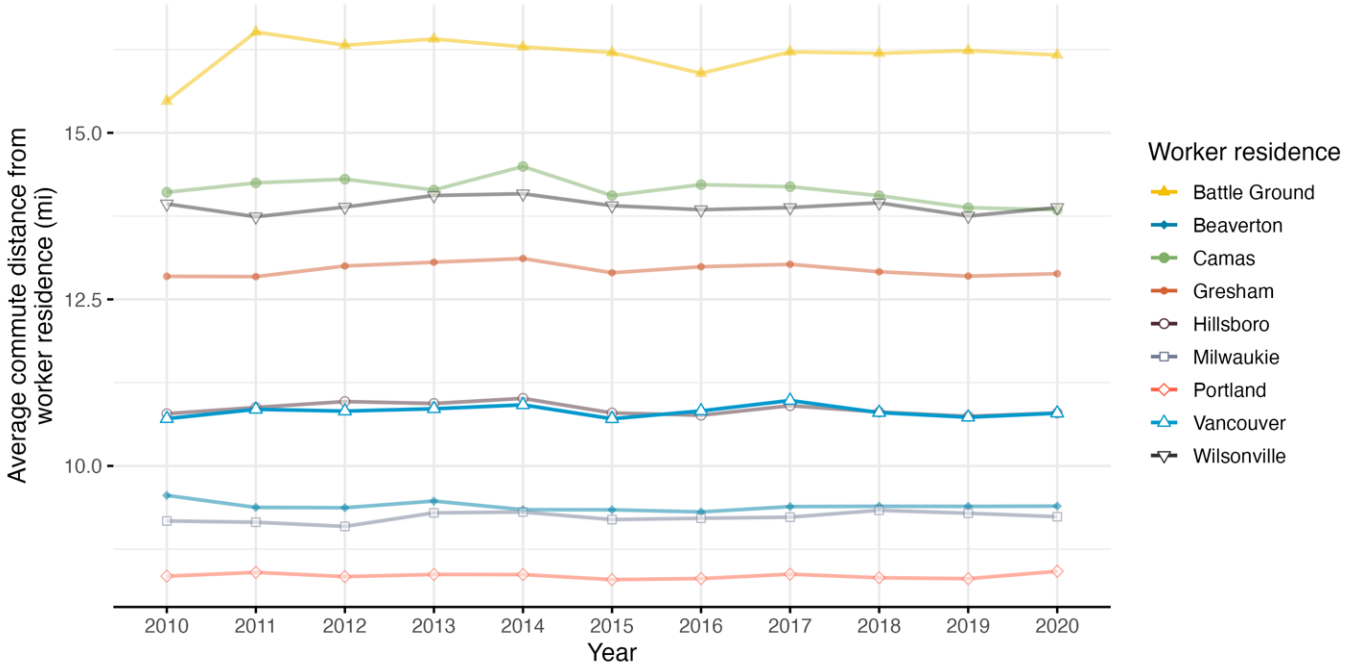
Exhibit 31. Top Commute Origins to Vancouver, 2010-2020
Source: LODES, 2010-2020
Note: Heavier line weights indicate the larger number of commuters shown in parentheses on the right of each origin



Residents commuting *from* Vancouver had the fourth shortest distance in 2020 (with Beaverton, Milwaukee, and Portland residents all having shorter commutes), at about 10.8 miles on average (Exhibit 32). This fluctuated only slightly between 2010 and 2020.

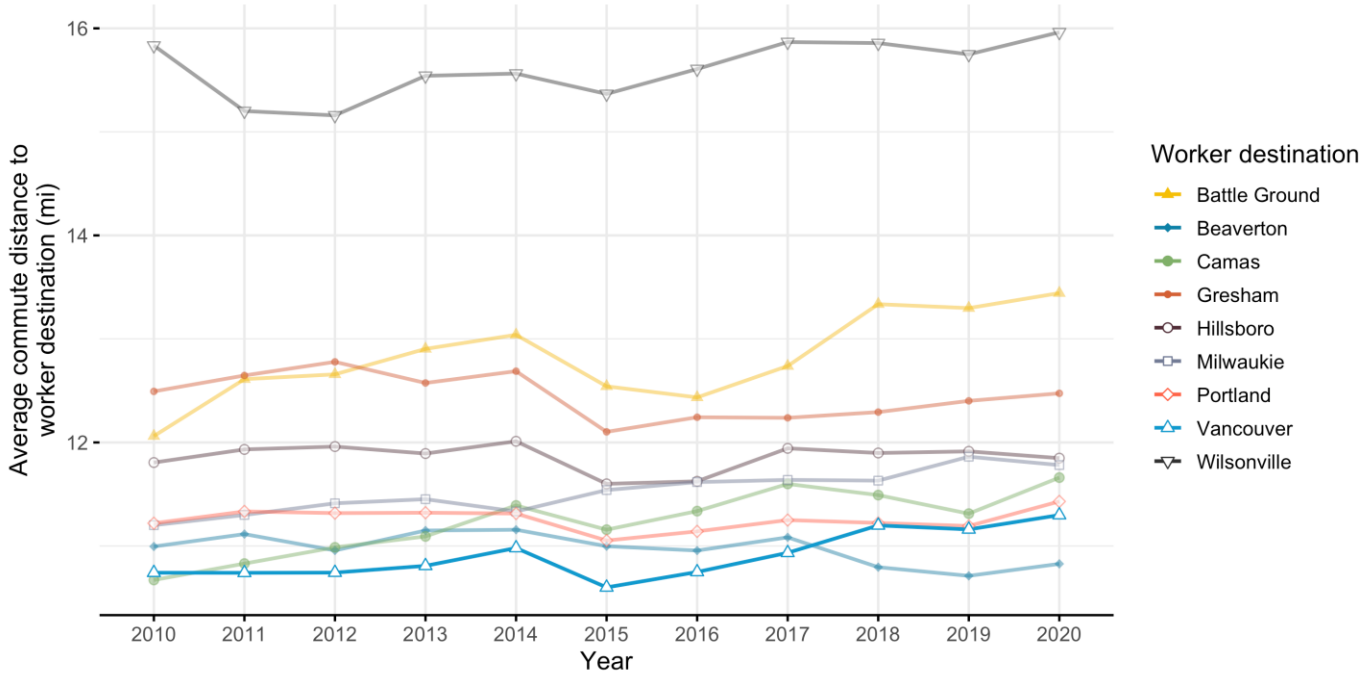
Exhibit 32. Average Commute Distance from Worker Residence, Vancouver and Surrounding Cities (Residents), 2010-2020

Source: LODES, 2010-2020



Of comparison geographies, workers commuting *to* Vancouver for work had the second shortest commute in 2020 (commuters to Beaverton had the shortest), at just over 11 miles on average (Exhibit 33). The average commute for Vancouver workers grew slightly since 2010 by about 0.5 miles.

Exhibit 33. Average Commute Distance to Worker Destination, Vancouver and Surrounding Cities (Workers), 2010-2020
Source: LODES, 2010-2020



Regional Employment

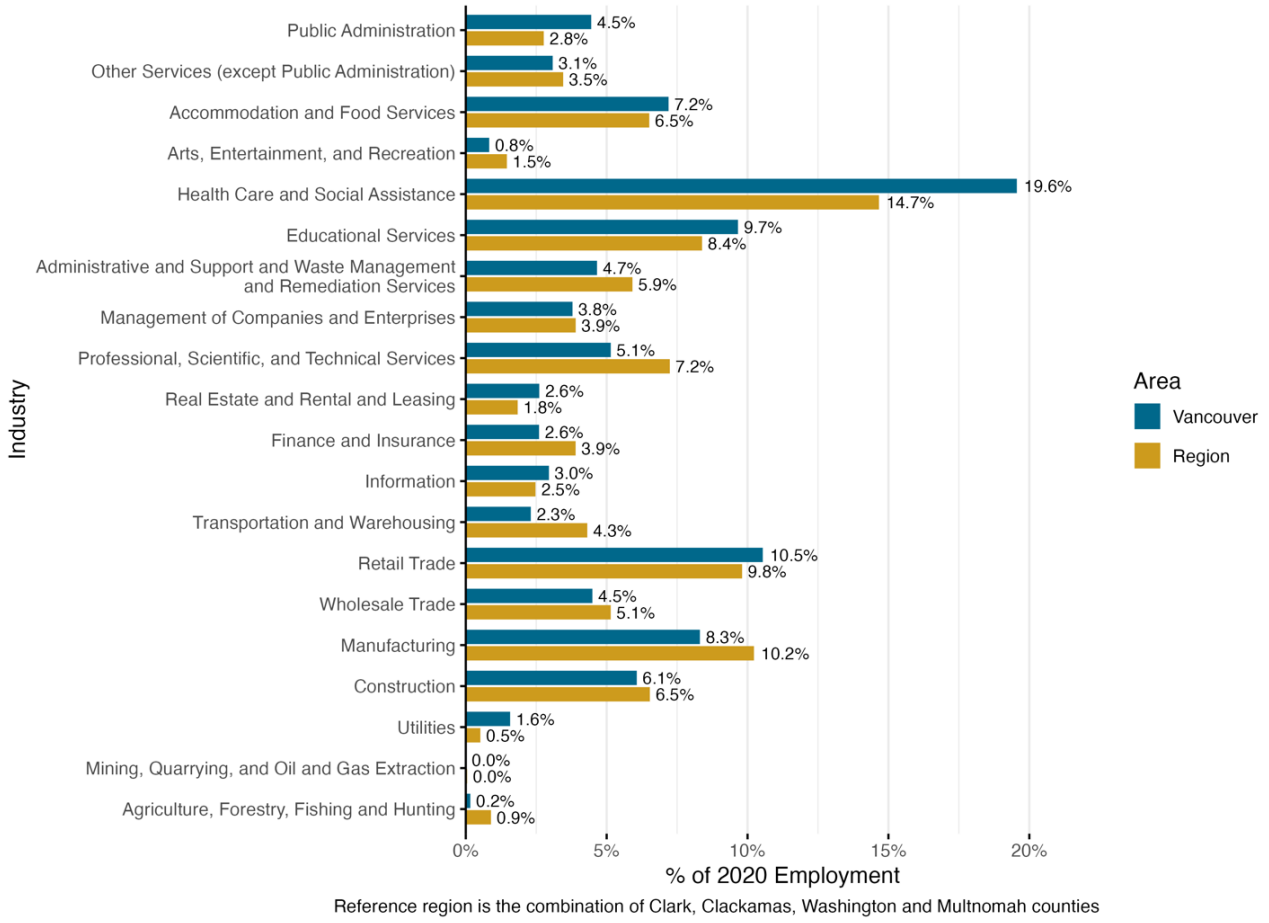
As the largest city in Clark County and the second largest in the Portland metropolitan region, regional trends are an important factor for Vancouver. Because employment data often includes confidentiality requirements to protect identifiable information about businesses and workers, many data points related to industry employment and wages are only publicly available at the County level. This section provides a connection between available County and regional data to provide context to the employment landscape in Vancouver.

Employment Composition

Exhibit 34 shows the share of employment by industry in both Vancouver and the Portland region. Service-based industries were particularly strong in Vancouver in 2020. In both the city and the region, healthcare and social assistance were clear standouts in employment, with the industry offering nearly one in five jobs in the city. Other industries that represented some of the largest shares of employment for the city and at a greater extent than the metro overall included retail trade, educational services, and accommodation and food services.

Many of the residents employed in retail trade and accommodation and food services industries receive low or moderate wages and require housing affordable at 50 to 80 percent Median Income,[22] which is typically not developable without some level of subsidy or incentives. Nearly 18 percent of Vancouver residents are employed in these service industry jobs, which gives a sense of the amount of affordable housing needed in the city.

Exhibit 34. Share of Employment by Industry, Vancouver and the Portland 4-County Metro Area (Region)
Source: LODES 2020



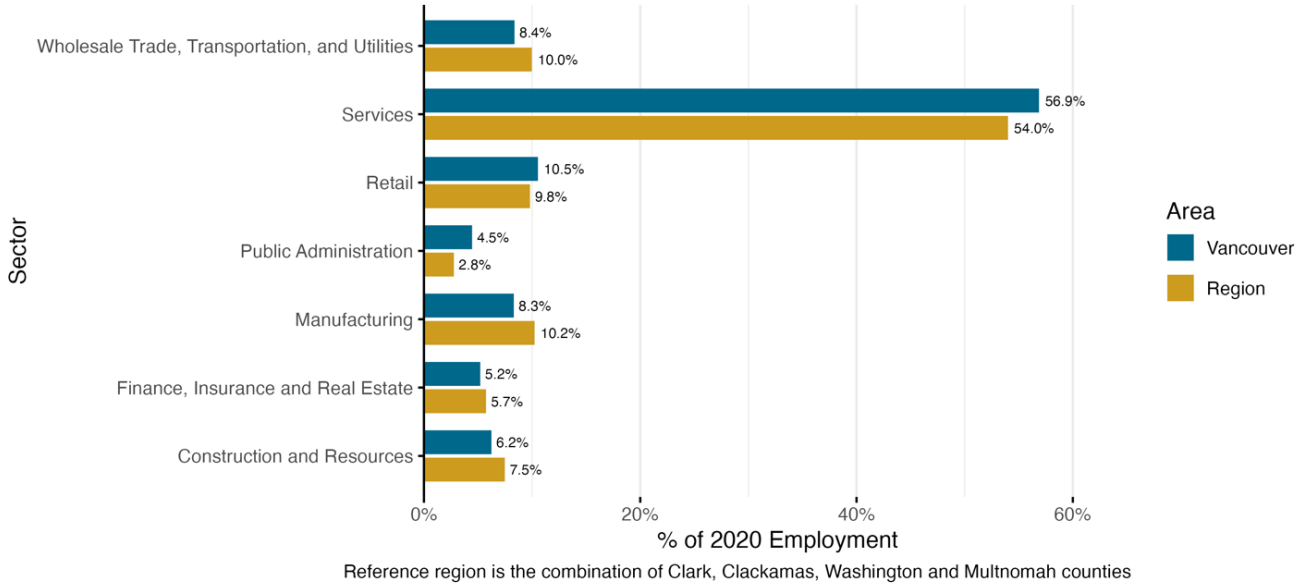
Reference region is the combination of Clark, Clackamas, Washington and Multnomah counties

Exhibit 35 further emphasizes the divide in Vancouver and the region between service industries and all other groups, with over half of jobs in both geographies falling into one of

[22] https://clark.wa.gov/sites/default/files/media/document/2022-06/Apr%2022%20Income%20Mar%2022%20FMR%20%20Jun%2022%20HOME%20Limits.pdf

these sectors. Manufacturing and construction had relatively highly employment in the city but are below the regional average in their share of employment.

Exhibit 35. Share of Employment by Industry Group, Vancouver and Portland 4-County Metro Area (Region)
Source: LODES 2020



Key Regional Industries

In Clark County, the industries with the largest employment in 2022 were Healthcare and Social Assistance; Government; Retail Trade; Construction; and Accommodation and Food Services. Of these industries, Government and Construction had average wages per employee above the average wage for all covered employment across the county, while Retail and Accommodation and Food Services paid below average wages. Healthcare and Social Assistance paid roughly equivalent wages with the county average.

Exhibit 36. Covered Employment Change, Clark County, 2012-2022

Source: Washington Employment Security Division

Note: The top five industries with the highest share of covered employment in 2022 are shown in **bold** and those paying above the county average wage in 2022 are highlighted in green

Sector	2012	2022	Share of Total Jobs (2022)	Average Wage (2022)	Change 2012 to 2022		
					Difference	Percent	AAGR
Management of companies and enterprises	1,193	3,576	2.0%	$111,725	2,383	200%	11.6%
Construction	**7,964**	**16,986**	**9.7%**	**$71,499**	**9,022**	**113%**	**7.9%**
Finance and Insurance	3,781	6,451	3.7%	$112,277	2,670	71%	5.5%
Educational Services	951	1,613	0.9%	$38,791	662	70%	5.4%
Health Care and Social Assistance	**18,074**	**27,639**	**15.7%**	**$64,412**	**9,565**	**53%**	**4.3%**
Professional, Scientific, and Technical Servic	6,692	10,169	5.8%	$99,988	3,477	52%	4.3%
Information	2,540	3,856	2.2%	$107,469	1,316	52%	4.3%
Accommodation and Food Services	**10,241**	**14,831**	**8.4%**	**$27,491**	**4,590**	**45%**	**3.8%**
Administrative and waste services	6,777	9,719	5.5%	$58,585	2,942	43%	3.7%
Real estate and rental and leasing	2,158	3,078	1.8%	$59,398	920	43%	3.6%
Retail trade	**14,646**	**19,139**	**10.9%**	**$42,261**	**4,493**	**31%**	**2.7%**
Transportation and Warehousing	2,917	3,548	2.0%	$72,086	631	22%	2.0%
Manufacturing	12,072	14,333	8.2%	$71,970	2,261	19%	1.7%
Wholesale Trade	6,042	6,953	4.0%	$92,968	911	15%	1.4%
Government	**23,026**	**25,856**	**14.7%**	**$71,555**	**2,830**	**12%**	**1.2%**
Agriculture, Forestry, Fishing and Hunting	631	594	0.3%	$48,781	-37	-6%	-0.6%
Arts, Entertainment, and Recreation	2,268	2,001	1.1%	$32,835	-267	-12%	-1.2%
Other services, except public administration	7,760	5,374	3.1%	$49,730	-2,386	-31%	-3.6%
Not Elsewhere Classified	109	136	0.1%	$178,803	n/a	n/a	n/a
Total	**129,842**	**175,852**	**100%**	**$66,824**	**46,010**	**35%**	**3.1%**

Largest Employers

Local leaders and economic development organizations benefit from having a detailed understanding of the top employers in their county, where those employers' facilities are located, and the industries they represent. This knowledge enables strategic decisions about policies, infrastructure investments, workforce development initiatives, and business attraction efforts that will support the county's economic health. For example, knowing the largest private sector industries and companies can inform technical training programs at local colleges and high schools. Understanding employer geography can also guide transportation infrastructure enhancements to improve access to job centers.

Regional Target Industry Clusters

In 2018, Clark County's economic development corporation CREDC established five target industry clusters in its 5-year action plan, including:

Computers and Electronics
Software
Clean Tech
Metals and Machinery
Life Sciences

As CREDC updates is strategic plan (concurrently with the Vancouver Comprehensive Plan), these sectors may evolve based on post-pandemic trends and other macroeconomic changes.

Many of the largest employers in Clark County are based in Vancouver and represent key industries like healthcare, technology, and education, including PeaceHealth, Vancouver Public Schools, the Vancouver Clinic, Bonneville Power Administration, and HP. Some employers have locations both in Vancouver and elsewhere in the region but maintain the majority of their facilities in the city. These large employers indicate clusters in line with those

identified by CREDC's strategic sectors identified through industry analysis, including computers and electronics, and life sciences.[23]

Exhibit 37. Top 10 Employers in Clark County, WA, 2020
Source: Columbia River Economic Development Council

Employer	Total Employees	Industry	Location
PeaceHealth	4,415	Healthcare	Multiple (based in Vancouver)
Vancouver Public Schools	3,178	Education	Vancouver
Evergreen Public Schools	2,698	Education	Vancouver
The Vancouver Clinic	1,526	Healthcare	Multiple (based in Vancouver)
Bonneville Power Administration	1,124	Energy	Vancouver
Kaiser Permanente	1,088	Healthcare	Multiple (based in Vancouver)
Hewlett-Packard	1,050	Technology	Vancouver
Clark College	1,023	Education	Vancouver
WaferTech	1,000	Technology	Camas
Fisher Investments	905	Finance	Camas

Analysis of Business Changes

The geographic distribution of employment has important implications for understanding how changing trends can have an impact on neighborhoods within Vancouver, as well as more localized commuting and transportation needs. Exhibit 38 identifies the change in employment between 2010 and 2020 for individual census tracts in the city, as well as the number of employees in 2020. Darker green circles indicate the highest level of growth in these tracts, while darker pink circles indicate stronger levels of decline in employment.

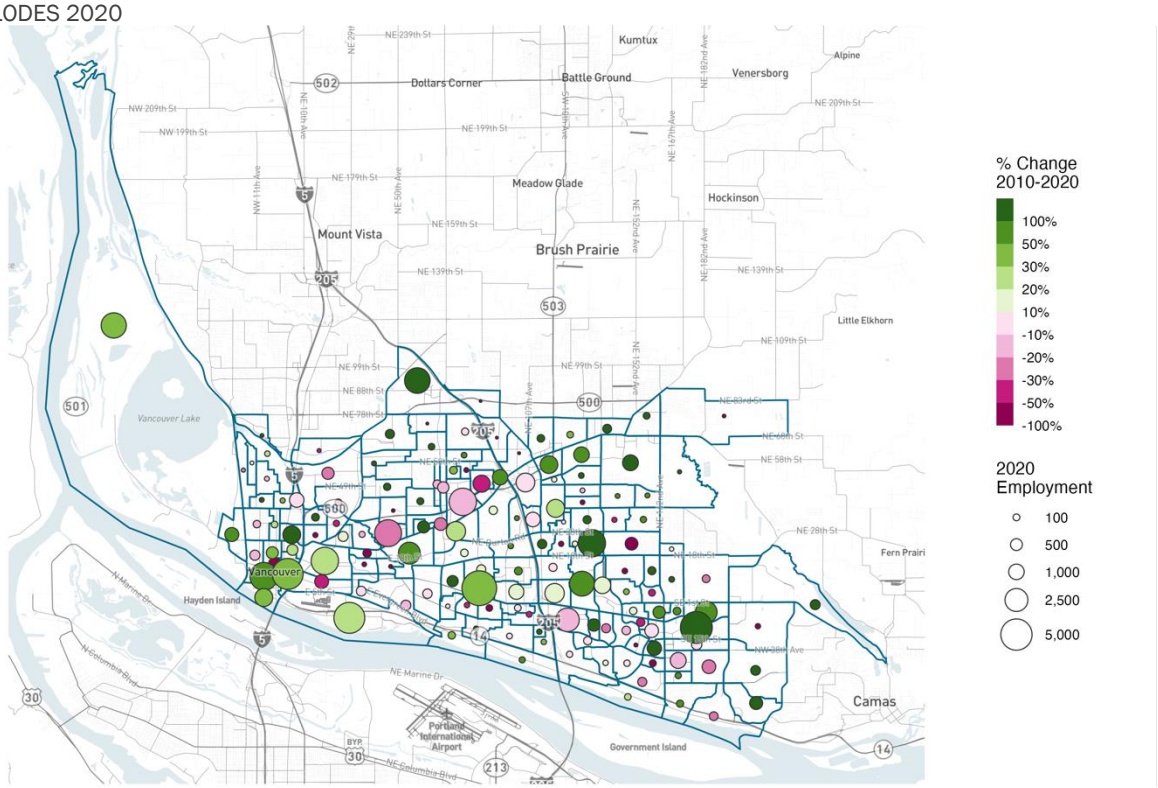
The areas with the strongest growth and total employment include tracts around Downtown Vancouver (near the intersection of the Columbia River and I-5), the Vancouver Innovation Center (on the city's east side), and tracts near I-205 which are home to major employers like PeaceHealth, Evergreen High School, and retail plazas. The large tract on the west side of Vancouver also saw growth, which is home to a large industrially zoned parcels and the Bonneville Power Administration (another major regional employer).

Areas that saw the most decline in employment are dispersed throughout Vancouver, and particularly those along Fourth Plain Boulevard and WA-500 which runs diagonally between I-5 and I-205. The areas are home to the Vancouver Mall and other traditional suburban-

[23] CREDC, "Industry Analysis," https://credc.org/industry-analysis/.

style retail centers which did not fare well nationwide at the onset of the COVID-19 pandemic.

Exhibit 38. Change in Employment by Census Tract, Vancouver, 2010-2020
Source: LODES 2020



Business Formation

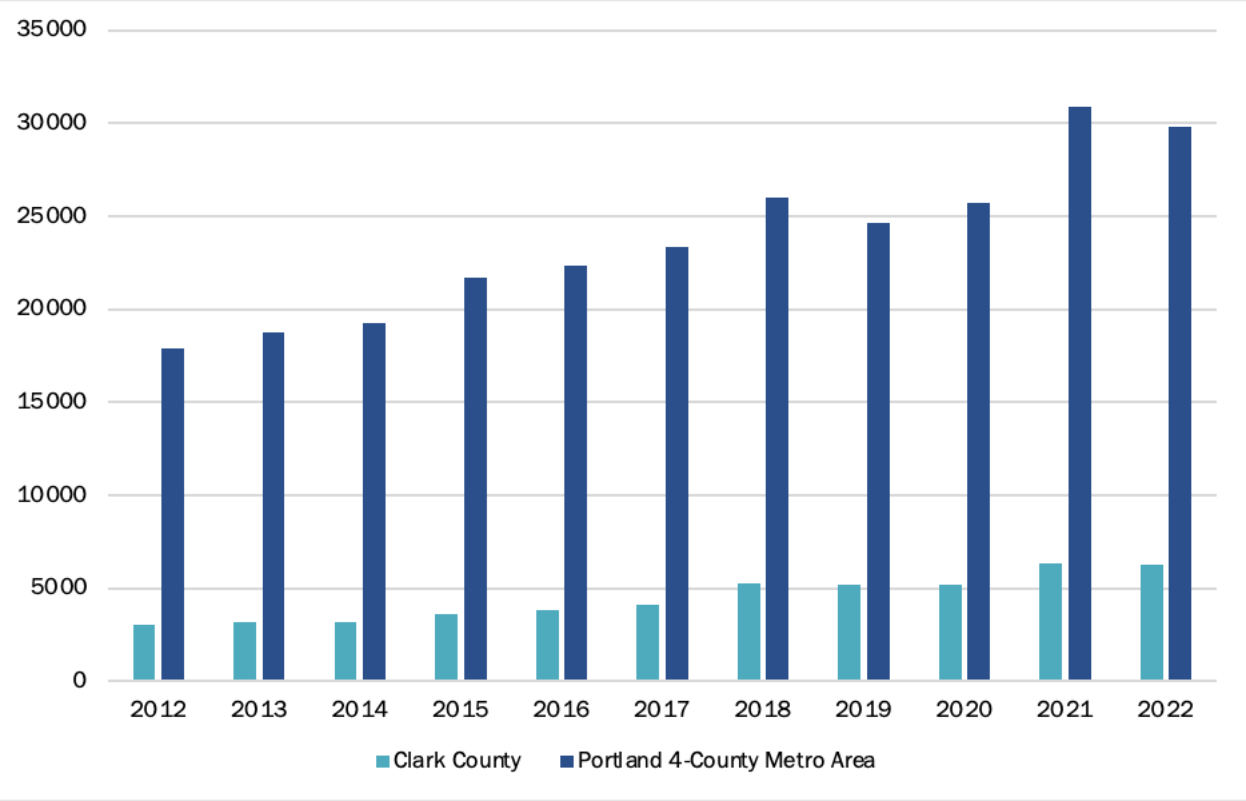
In 2022, 6,241 new business applications were filed in Clark County, growing steadily by more than double (106 percent) from the 3,031 business applications filed in 2012. The growth rate for the four-county area over this time period was only 58 percent, potentially indicating that Clark County has been successfully growing in their ability to attract new firms relative to the region. This could also point to a growth in small businesses and startups rather than the relocation of large employers, following national trends seen in entrepreneurship since 2020.[24] Applications in Clark County accounted for approximately 26 percent of all new

[24] Ryan A. Decker and John Haltiwanger, "Surging Business Formation in the Pandemic: Causes and Consequences?," Brookings, September 27, 2023, https://www.brookings.edu/articles/surging-business-formation-in-the-pandemic-causes-and-consequences/.

firms started within the four-county metro area (including Clark, Clackamas, Multnomah, and Washington Counties) in 2022.

Exhibit 39. Annual Business Applications, Clark County and 4-County Portland Metro (Clark, Multnomah, Washington, and Clackamas Counties), 2012–2022

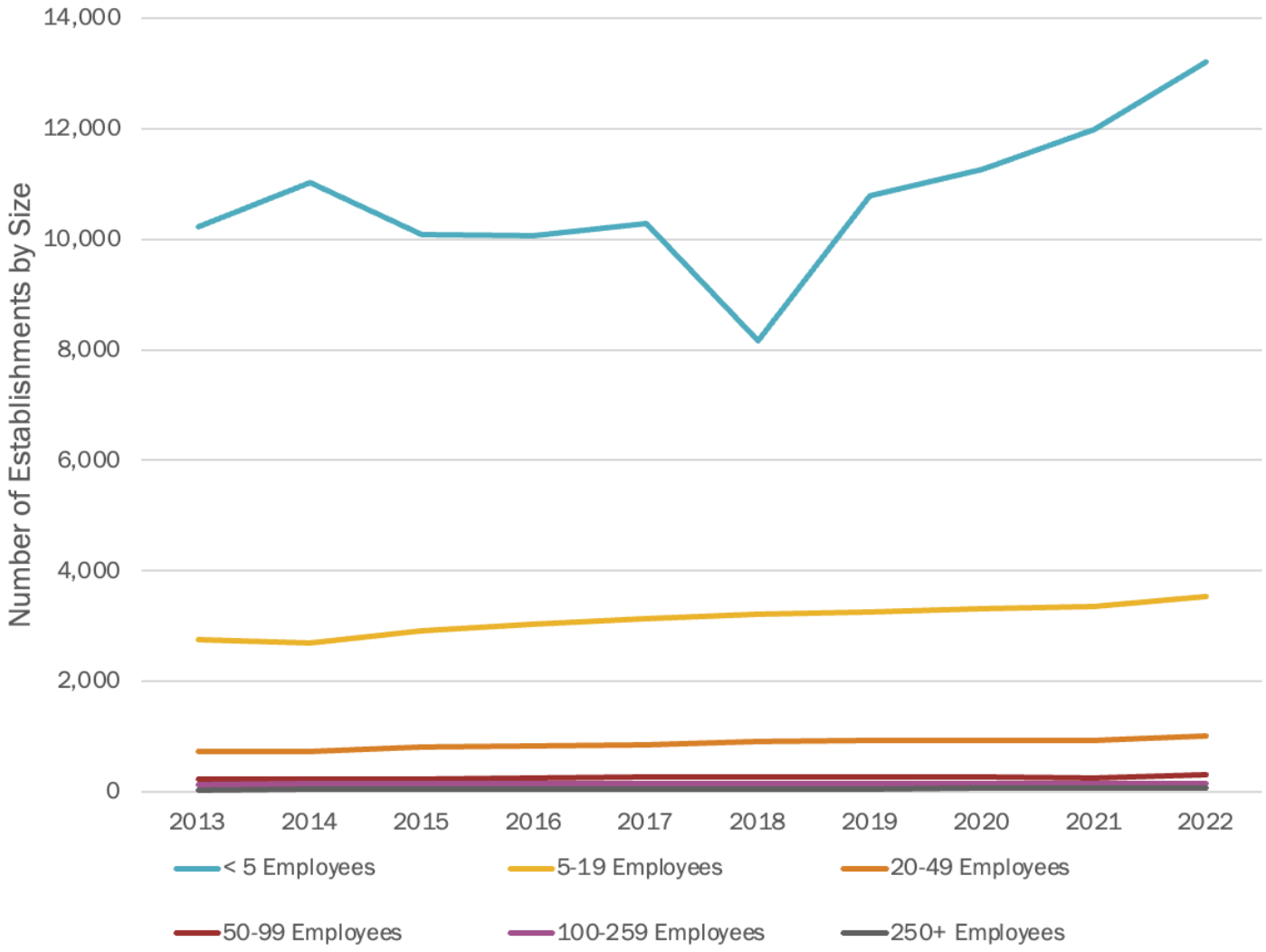
Source: US Census Bureau, Business Formation Statistics. Note: This data is only available at the county level.



Clark County has seen a notable growth in the number of small firms (those with less than five employees) since 2018 (Exhibit 40), representing a resurgence after the number of small firms declined in the early 2010's. Between 2020 and 2022 alone, the number of establishments in this category grew by 17 percent (1,939 new firms), indicating a post-pandemic continuation of the upward trend for startups and small businesses located in the County. The number of larger firms (with over 250 employees) also grew in this time period by 24 percent, increasing from 67 to 83 establishments. These large firms consistently comprised the greatest share of employees overall in Clark County since 2012, followed by a steady share of employment for smaller firms with between 5 and 19 workers (Exhibit 41). It is likely that the success of Clark County seen in new business formation is linked to this growth in small businesses, following

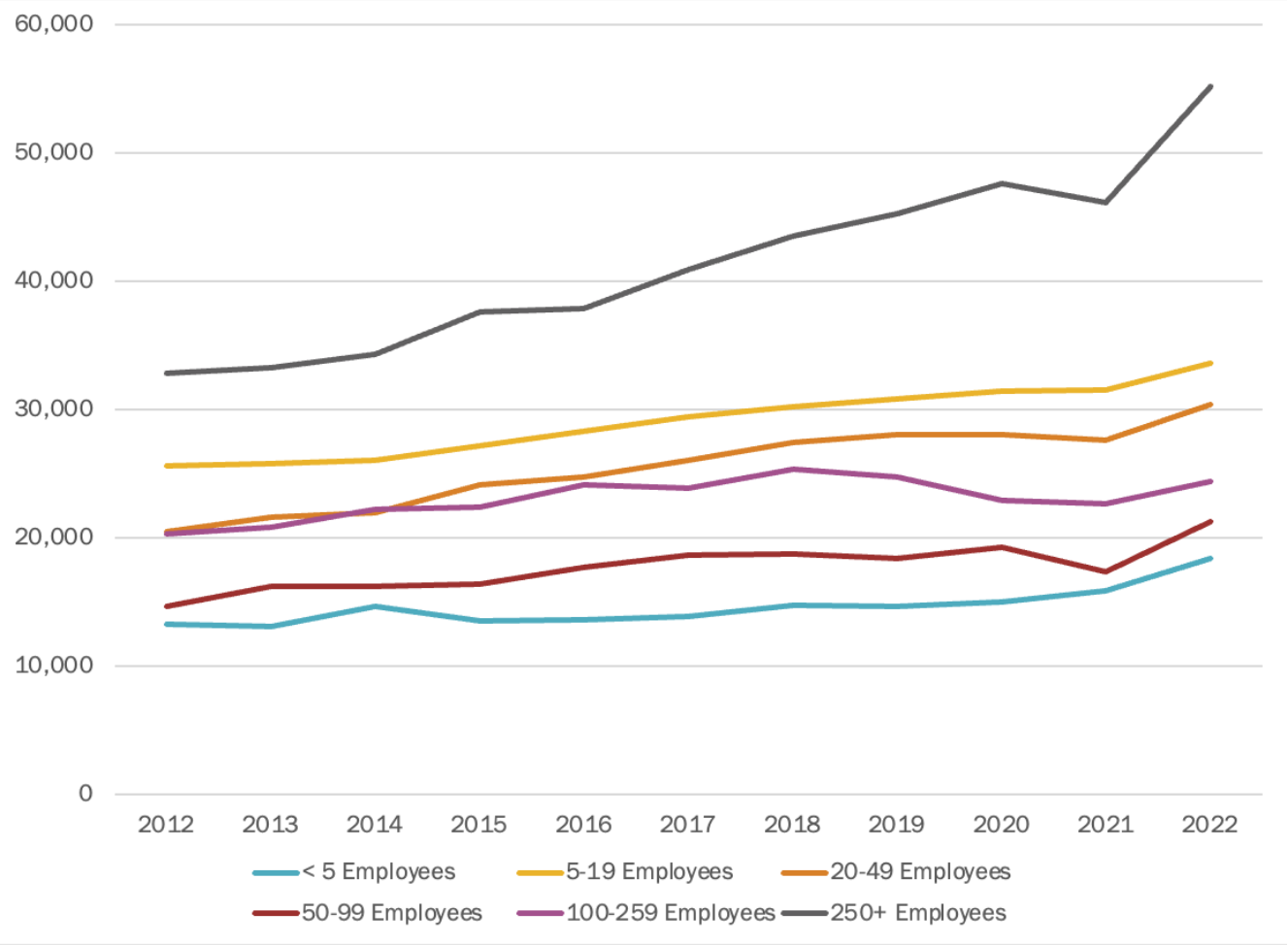
national trends seen in entrepreneurship since 2020,[25] while the largest firms continue to account for a larger share of total jobs.

Exhibit 40. Number of Establishments by Size, Clark County, 2013–2022
Source: Washington State Employment Security Department/Labor Market and Economic Analysis (LMEA)
Note: Data is available through Q1 2023 but not included in this graphic.



[25] Ryan A. Decker and John Haltiwanger, "Surging Business Formation in the Pandemic: Causes and Consequences?," Brookings, September 27, 2023, https://www.brookings.edu/articles/surging-business-formation-in-the-pandemic-causes-and-consequences/.

Exhibit 41. Number of Employees by Establishment Size, Clark County, 2013–2022
Source: Washington State Employment Security Department/Labor Market and Economic Analysis (LMEA)



Taxable Retail Sales

The City of Vancouver's taxable retail sales were higher than those in other Clark County jurisdictions over the past decade, climbing up to $6.3 billion in 2022 across all NAICS categories. The unincorporated areas of Clark County saw about half of Vancouver's taxable retail sales, totaling $3.3 billion in 2022. All other Clark County jurisdictions were well below $1 billion each, with Battle Ground being the highest among smaller cities at $602 million in 2022. Despite their low total amounts compared with Vancouver and Unincorporated Clark County, the Cities of Ridgefield and La Center saw the greatest rate of change over this period. Adjusted for inflation, Ridgefield saw its taxable retail sales increase to over four times its revenue in 2012, and La Center saw its sales more than double. On a per capita basis, unincorporated areas of the county saw the greatest change in taxable retail sales proportionate to changes in population.

Exhibit 42. Total Taxable Retail Sales by Clark County Jurisdictions, 2012-2022
Source: Washington Department of Commerce, US Bureau of Labor Statistics Inflation Calculator
Note: Total revenues by year are not adjusted for inflation.

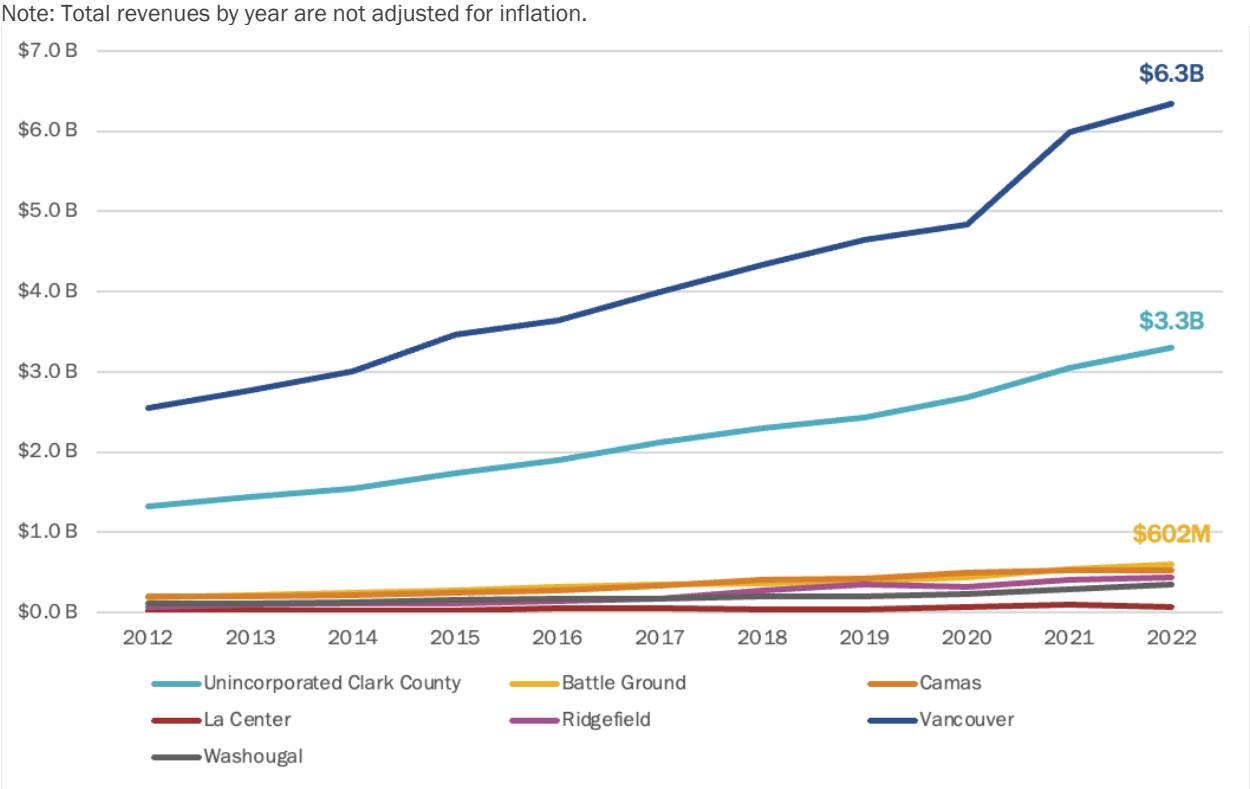


Exhibit 43. Total Taxable Retail Sales by Clark County Jurisdictions, 2012-2022 (in 2022$)
Source: Washington Department of Commerce, US Bureau of Labor Statistics Inflation Calculator

Jurisdiction	2012 (in 2022$)	2022	% Change 2012-2022 (adj.)	AAGR
City of Vancouver	$3.2B	$6.3B	95.5%	9.5%
Unincorporated Clark County	$1.7B	$3.3B	94.7%	9.5%
Other Jurisdictions (Total)	$742M	$2.0B	170.2%	17.0%
Clark County (Total)	$5.7B	$11.6B	105.0%	10.5%

Exhibit 44. Per Capita Taxable Retail Sales by Clark County Jurisdictions, 2012-2022 (in 2022$)
Source: Washington Department of Commerce, US Bureau of Labor Statistics Inflation Calculator

Jurisdiction	2012 (in 2022$)	2022	% Change 2012-2022 (adj.)	AAGR
City of Vancouver	$20,175	$32,119	59.2%	5.9%
Unincorporated Clark County	$8,333	$13,860	66.3%	6.6%
Other Jurisdictions	$15,459	$23,445	51.7%	5.2%
Clark County	$17,031	$22,362	31.3%	3.1%

Regional Industries and Employment

Tracking changes in Vancouver's location quotient (LQ) and employment growth provides valuable insights into the trajectory of the local economy. Monitoring shifts in these metrics over time shows how a city's economic makeup is evolving and whether certain sectors are growing or declining compared to broader trends. The data in this section highlights Vancouver's competitive economic advantages and identifies high-potential clusters which can be helpful to inform the City's strategies for attracting investment and talent. Exhibit 45 and Exhibit 46 provide analysis describing the location quotient, by major employment sector, for Vancouver as it relates to changes in employment for 2-digit NAICS codes which represent broad industries.

In Exhibit 45 the location quotient (y-axis) is a value that describes how concentrated an employment sector is locally relative to the four-county region. A value of 1.0 for a sector means the county is on par with the four-county region (i.e., has the same share of jobs as the state and is considered not concentrated). Values exceeding 1.0 (above the x-axis intersection) suggest industry concentration in the area. The higher the location quotient, the more concentrated the sector in the analysis areas. Employment sectors with bigger location quotients typically indicate a competitive advantage and, in turn, a higher likelihood of attracting new firms in that sector to the region. The average annual percent change in employment over the 2010 to 2020 period is denoted on the x-axis. Each major employment sector is also shown with a circle, relatively sized to indicate the number of covered jobs in each sector in 2020.

Industries in the top right quadrant (particularly those with larger levels of employment) show strong industry clusters which are both concentrated in Vancouver and growing in employment. **Most of the high-level industry clusters in this group in Vancouver are service-based industries, including retail, accommodation and food services, educational services, information, real estate, and healthcare and social assistance.** While public administration and utilities both remained concentrated in Vancouver in 2020, these two sectors saw a slight decline in employment, falling in the upper left quadrant of the chart. However, these losses were relatively low and indicate relative stability for both industries.

Sectors that fall in the lower right corner can show emerging industries, which are growing in employment but are not yet at a critical mass for concentration in Vancouver. **Management of companies and enterprises dominated employment growth despite only accounting for a modest share of employment overall. However, the industry's quick rise in employment indicate that it will likely continue to grow in Vancouver. Construction, wholesale trade, manufacturing, administrative services, and professional, scientific and technical services all showed high potential as well, increasing their employment while nearing an LQ of 1.0.**

Exhibit 45. Sector Analysis by Change in Employment, Vancouver, 2010-2020
Source: LODES 2010-2020

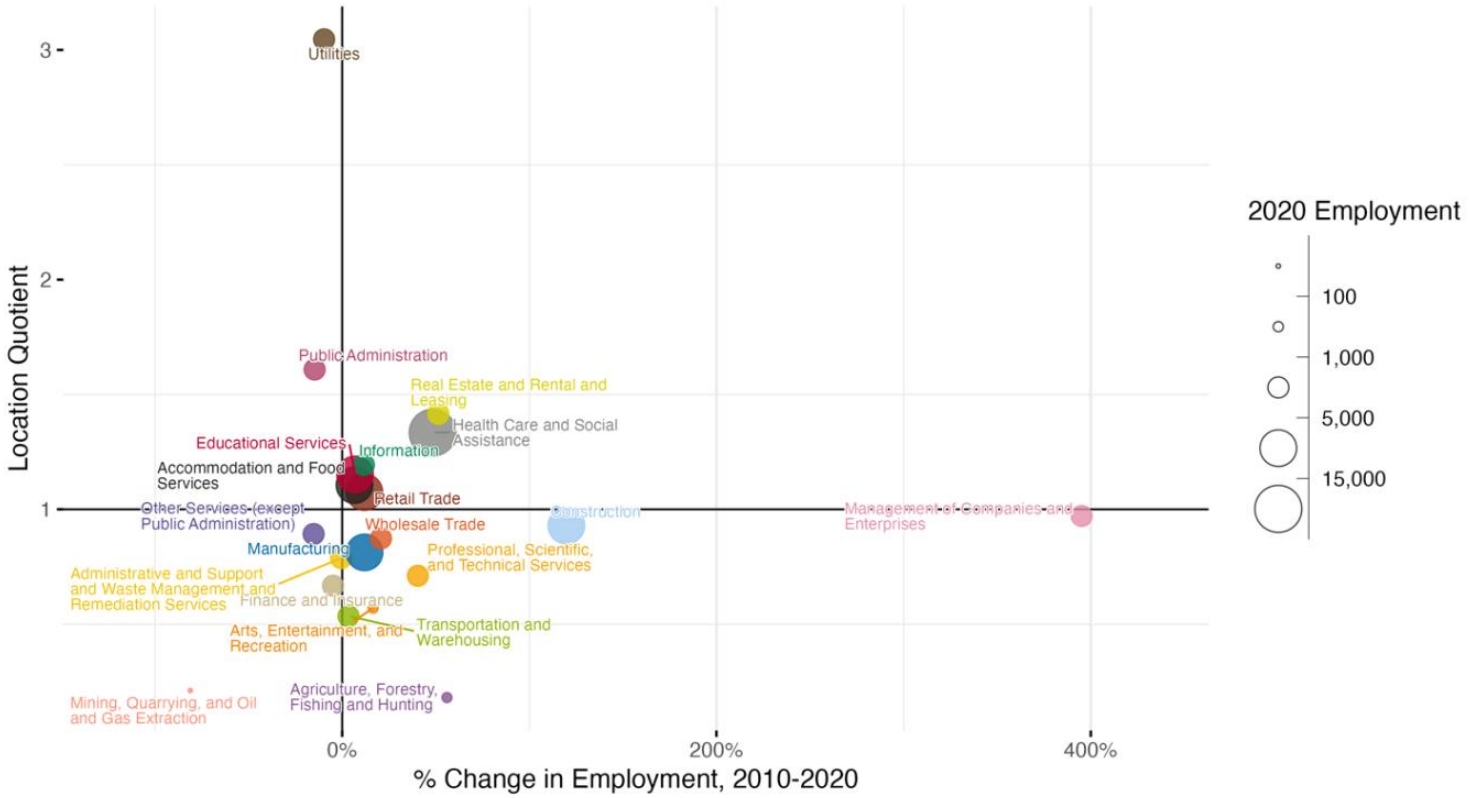
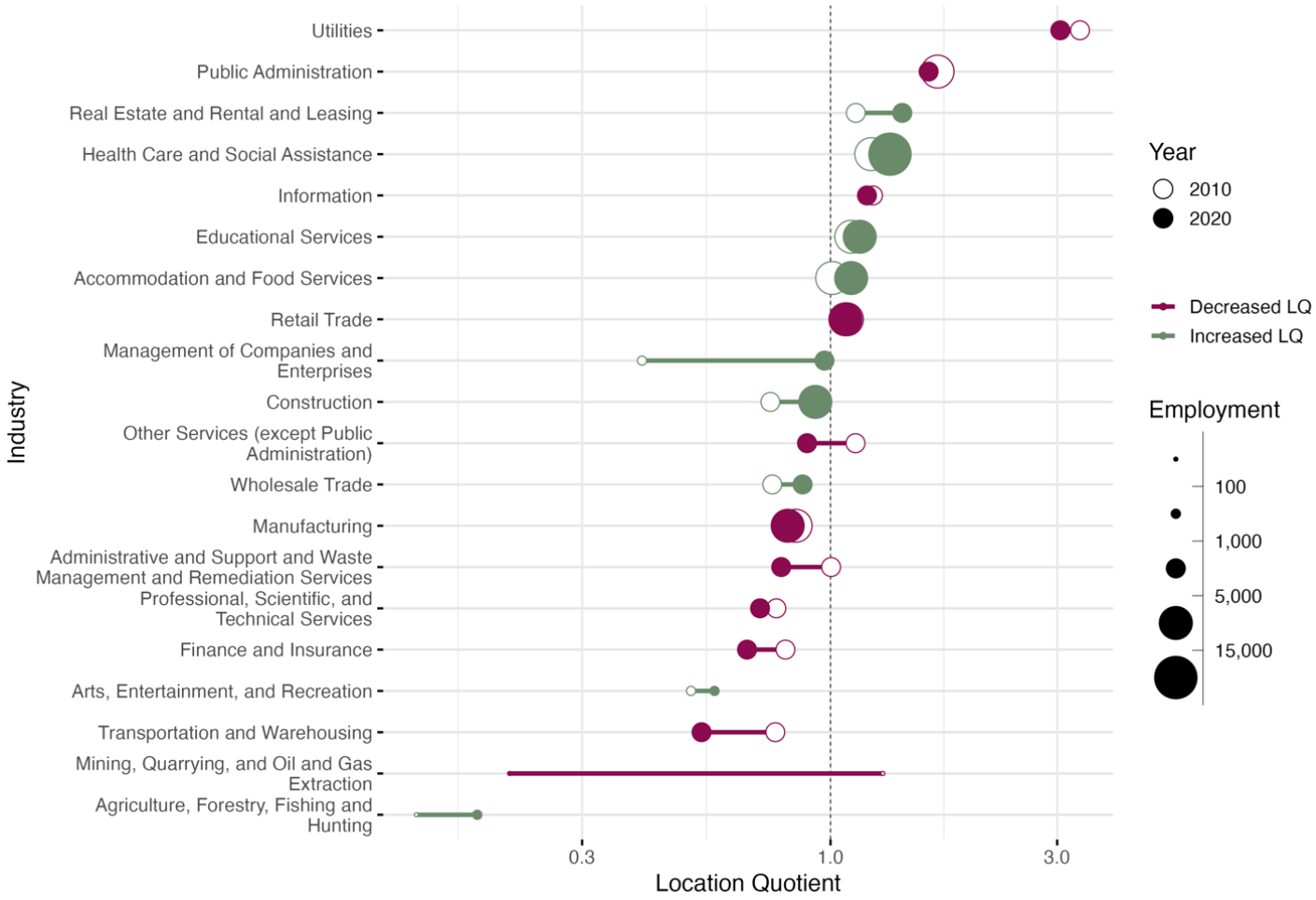


Exhibit 46 shows the change in location quotient for sectors in Vancouver between 2010 and 2020, with green colored circles showing those which increased (became more locally concentrated) and maroon circles showing those that decreased (became less concentrated). Since location quotient is calculated as a comparison of Vancouver employment and the four-county region, it can change both due to above-average employment growth locally, or a decline in employment on a larger scale that did not have as strong of an impact on a jurisdiction.

The industries that have a high concentration in Vancouver relative to the four-county region are utilities, public administration, real estate, health care and social assistance, information, educational services, and accommodation and food services. Industries that saw the greatest increase in concentration in Vancouver between 2010 and 2020 include management of companies and enterprises, healthcare and social assistance, real estate, construction, and wholesale trade. Like those industries seeing positive growth of these industries are service-based, with the exception of construction and wholesale trade (which have benefited from Vancouver's availability of large opportunity sites and industrial land). Several of these industries also account for some of the highest shares of employment in Vancouver, with healthcare and social assistance being the largest single industry in the city in 2020 and construction and wholesale trade both falling within the top ten.

Some industries also saw a notable decline in this period, including mining, quarrying, oil and gas, transportation and warehousing, finance and insurance, administrative and support services, and other services. Their slow or negative employment change seen in Exhibit 46 indicates that opportunities to grow these sectors are slowing down or decreasing.

Exhibit 46. Sector Analysis by Change in Location Quotient, Vancouver, 2010-2020
Source: LODES 2010-2020



Subsectors

Data at the 3-digit NAICS code level provides a more detailed look at trends for specific subsectors in Clark County. Subsectors with the highest employment and location quotients within Clark County provide more specific details on economic trends and opportunities.

In 2022, the top twenty subsectors by employment were spread across larger sectors, with five falling under the Retail Trade (44-45) industry, three within Construction (23), two respectively in Health Care and Social Assistance (62) and Real Estate and Rentals and Leasing (52), and the remainder among other larger industries. Overall, these top subsectors accounted for 59 percent of all covered jobs in Clark County in 2022 and saw more rapid growth than all jobs in the County (increasing by 56 percent since 2012 compared to 35 percent across all industries). All top subsectors in 2022 saw positive growth in employment since 2012.

The subsectors which saw the highest growth between 2012-2022 include Specialty trade contractors; Social assistance, nursing, and residential care; Management of companies and enterprises; Construction of buildings; and Securities, commodity contracts, and other financial investments and related activities. All of these subsectors more than doubled in employment since 2012 and maintained a location quotient (LQ) above 1.0, indicating a comparative advantage (Exhibit 48). Computer and electronic product manufacturing was had the highest LQ among all subsectors (of any employment size) in the County.

Of the 20 subsectors with the highest employment in Clark County, half (10) offered higher wages compared to the Clark County average, with the highest wages in professional sectors: Securities, commodity contracts, and other financial investments and related activities, Management of companies and enterprises, and Professional, scientific, and technical. However, the subsector with the greatest total employment (Food service and drinking places) paid less than half of the County average. Likewise, four of the five Retail Trade subsectors paid lower wages than the County average, with only one (Motor vehicle and parts dealers) offering higher wage opportunities.

Exhibit 47. Top Twenty Subsectors by Covered Employment, Clark County, 2012-2022

Source: Bureau of Labor Statistics

Note: The top five industries with the highest % of growth in covered employment in 2022 are shown in **bold** and those paying above the county average wage in 2022 are highlighted in green. Due to changes in the NAICS codes classification system in 2017 and 2022, some numeric designations of sectors have changed or aggregated since 2012.

Sector	Subsector (3-Digit NAICS)	2012	2022	Share of Total Jobs (2022)	Average Wage (2022)	Change 2012 to 2022		
						Difference	Percent	AAGR
722	Food services and drinking places	9,305	13,646	7.8%	$26,689	4,341	47%	3.9%
238	**Specialty trade contractors**	**4,954**	**11,182**	**6.4%**	**$65,695**	**6,228**	**126%**	**8.5%**
621	Ambulatory health care services	8,069	10,485	6.0%	$83,086	2,416	30%	2.7%
541	Professional, scientific, and technical	6,692	10,157	5.8%	$100,293	3,465	52%	4.3%
561	Administrative and support services	6,299	9,110	5.2%	$58,074	2,811	45%	3.8%
623	**Social assistance, nursing and residential care**	**3,409**	**7,583**	**4.3%**	**$29,823**	**4,174**	**122%**	**8.3%**
455	General merchandise retailers	4,517	5,479	3.1%	$35,143	962	21%	1.9%
423	Merchant wholesalers, durable goods	2,932	4,195	2.4%	$93,009	1,263	43%	3.6%
445	Food and beverage retailers	2,987	3,862	2.2%	$34,369	875	29%	2.6%
551	**Management of companies and enterprises**	**1,194**	**3,576**	**2.0%**	**$111,732**	**2,382**	**199%**	**11.6%**
236	**Construction of buildings**	**1,546**	**3,542**	**2.0%**	**$73,141**	**1,996**	**129%**	**8.6%**
334	Computer and electronic product manufacturing	2,926	3,464	2.0%	$88,052	538	18%	1.7%
531	Real estate	1,863	2,657	1.5%	$59,823	794	43%	3.6%
522	Credit intermediation and related activities	2,218	2,518	1.4%	**$96,626**	300	14%	1.3%
459	Sporting goods, hobby, musical instrument, book, and miscellaneous retailers	1,631	2,504	1.4%	$33,638	873	54%	4.4%
523	**Securities, commodity contracts, and other financial investments and related activities**	**637**	**2,341**	**1.3%**	**$153,402**	**1,704**	**268%**	**13.9%**
237	Heavy and civil engineering construction	1,465	2,229	1.3%	$98,775	764	52%	4.3%
444	Building material and garden equipment and supplies dealers	1,258	2,155	1.2%	$53,553	897	71%	5.5%
441	Motor vehicle and parts dealers	1,194	1,959	1.1%	$79,142	765	64%	5.1%
811	Repair and maintenance	1,898	1,954	1.1%	$60,164	56	3%	0.3%
	Total (Top 20 Subsectors)	**66,994**	**104,598**	**59%**		**37,604**	**56%**	**4.6%**
	Total (All County Jobs)	*129,842*	*175,852*	*100%*	*$66,824*	*46,010*	*35.4%*	*3.1%*

Exhibit 48 and Exhibit 49 show location quotient and change in employment for the 20 subsectors with the largest shares of employment in Clark County. Of the top subsectors, the majority (16) had a location quotient greater than 1.0, indicating a greater concentration of jobs in those subsectors in Clark County compared to the United States overall. The subsectors with the greatest concentration in Clark County were Computer and electronic product manufacturing, Specialty trade contractors, and Securities, commodity contracts, and other financial investments and related activities.

Exhibit 48. Subsector Analysis by Change in Covered Employment, Clark County, 2012-2022 (Selected Subsectors with Highest Employment Growth/LQ)

Source: Bureau of Labor Statistics

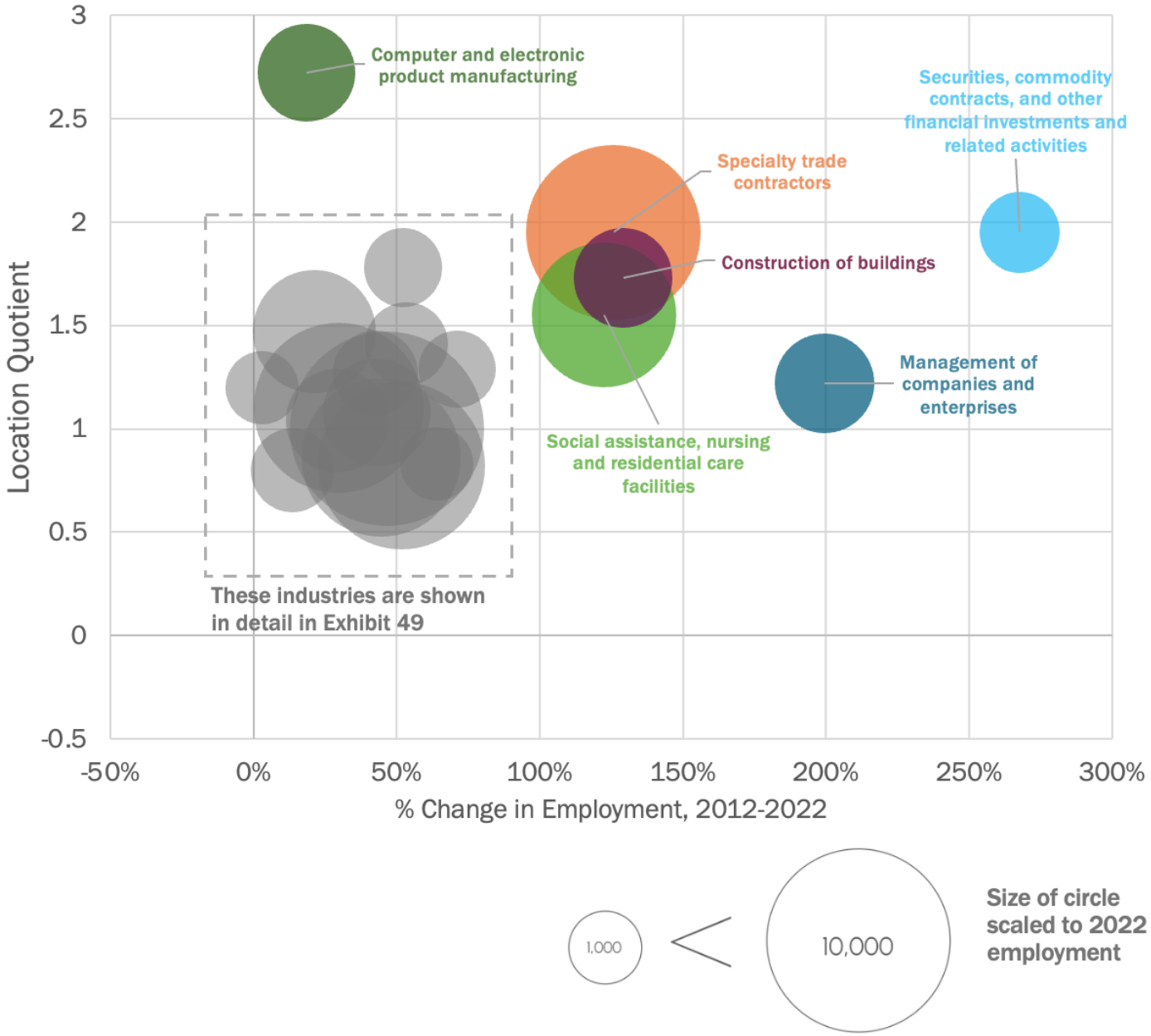
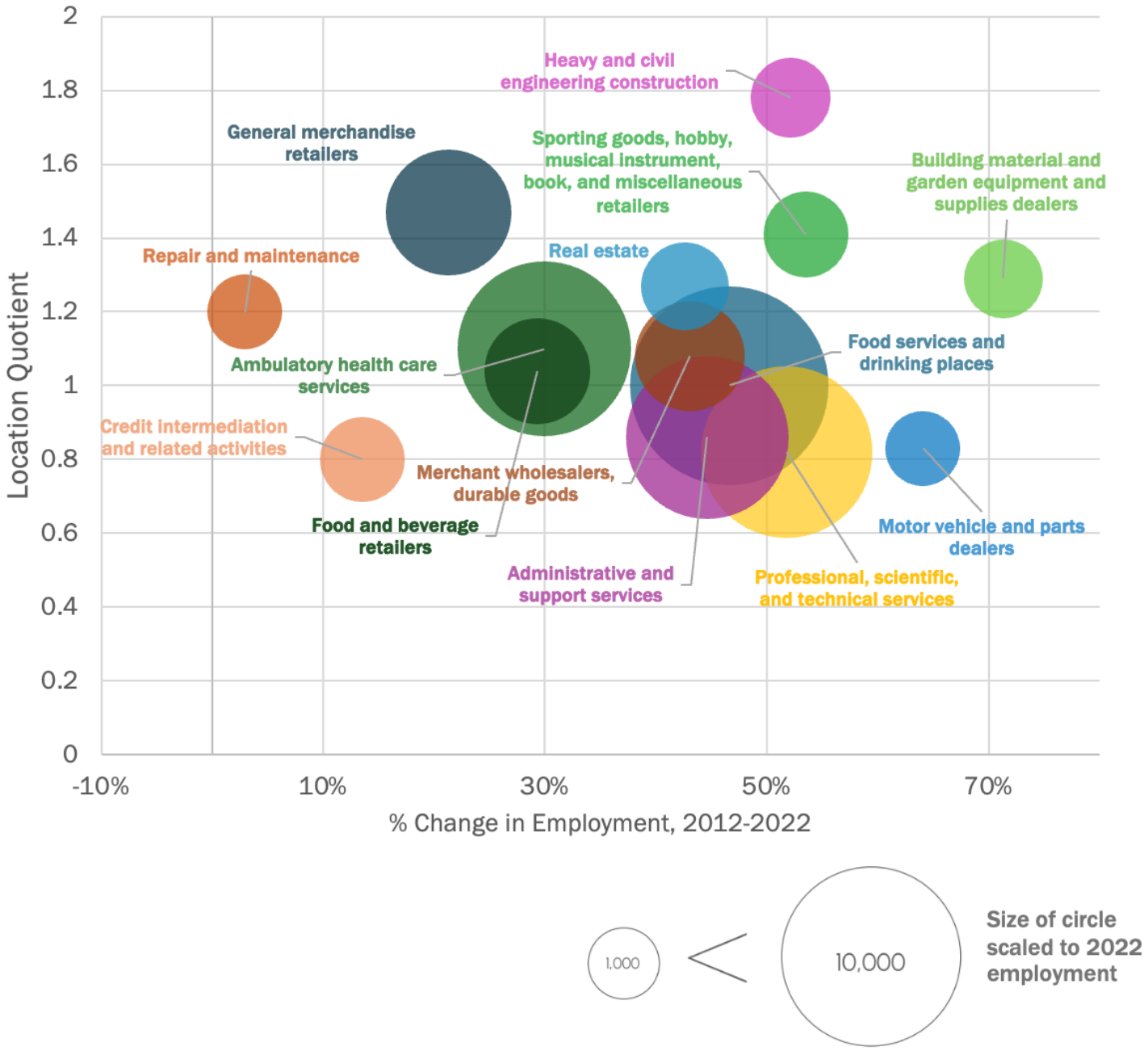


Exhibit 49. Subsector Analysis by Change in Covered Employment, Clark County, 2012-2022 (Top 20 Subsectors by Employment)

Source: Bureau of Labor Statistics

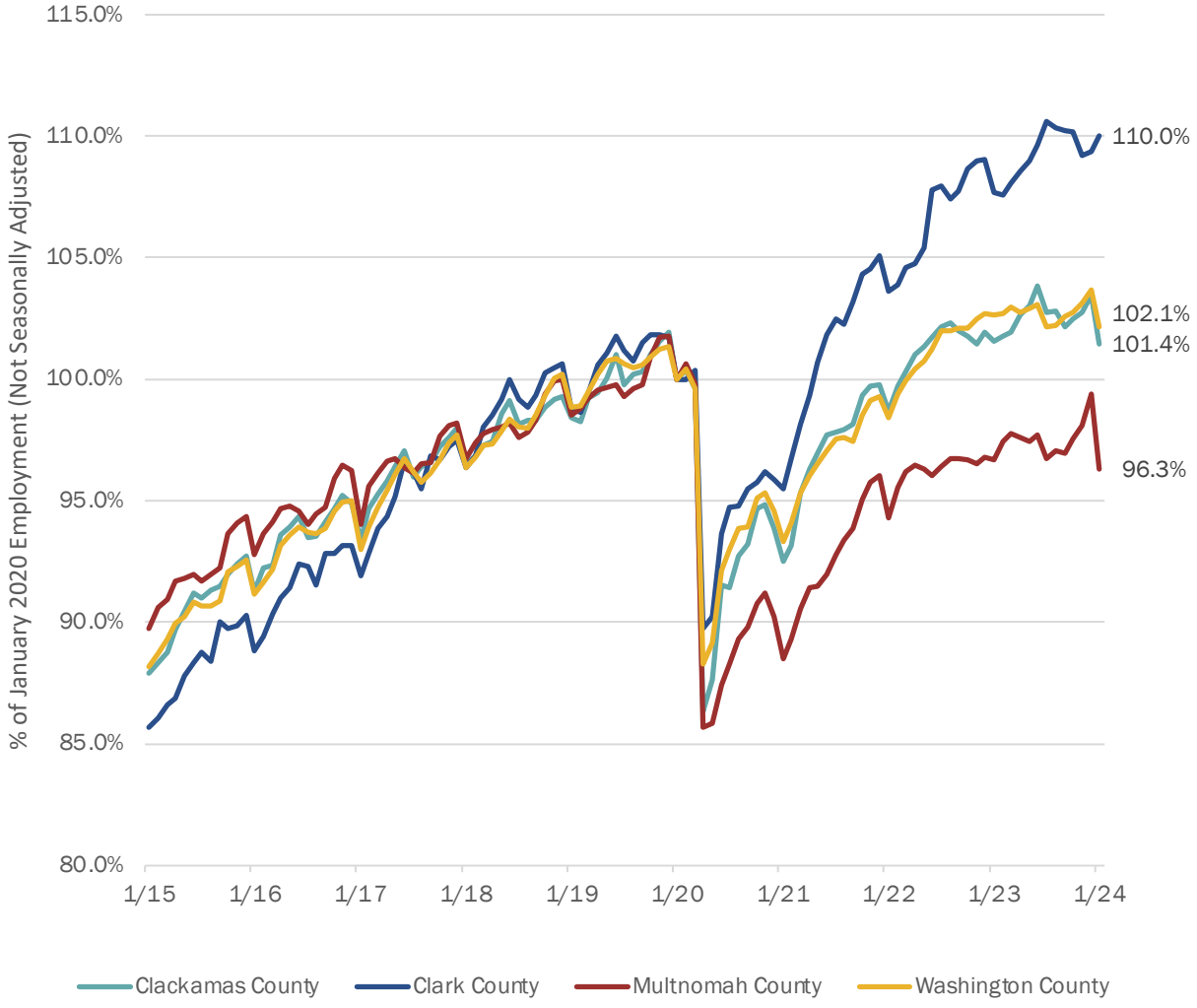


Post-Covid Employment Recovery

Like most places in the region and across the nation, Clark County experienced a sharp drop in employment in early 2020, following the onset of the COVID-19 pandemic. In March of 2020, employment in Clark County dropped to 85 percent of the number of jobs in January of that same year. The rest of the Portland Metropolitan region experienced a similar drop in employment during that time. Employment has been steadily increasing across the region since, and Clark County has had a particularly strong recovery. Clark County was back to a pre-pandemic (January 2020) level of employment by April 2021, where Washington and Clackamas Counties were by December 2022. As of January 2024, Clark County was at 110 percent of January 2020 employment level.

Exhibit 50. Annual Employment Change Compared to Pre-pandemic by County

Source: 2015 to 2023 (through June) Current Employment Statistics - Bureau of Labor Statistics & Oregon Employment Department



Section 4. Real Estate Market Conditions

This section details Vancouver's commercial real estate conditions and identifies market drivers and trends that will influence the market appeal and viability of commercial uses in the area. This report primarily covers nonresidential commercial real estate including office, industrial, and retail building types in the city, as well as a comparison with Clark County and the four-county Portland Metro Area (including Clark, Multnomah, Clackamas, and Washington Counites). The Housing Needs Assessment portion of this Comprehensive Plan Update covers the residential real estate market in greater depth. The exhibits in the section below show historical trends in the average effective rent rates and average annual vacancy rates for the analysis. In general, the analysis shows trends in Triple-Net (NNN) rents, vacancy rates, and deliveries (these are described below). This section also looks back to trends in the past fifteen years, capturing a longer cycle of real estate trends including the 2008 recession and the COVID 19 pandemic.

- Triple-Net (NNN): Represents annual rents on a per-square-foot (psf) basis, not including any pass-through expenses such as taxes, insurance, and utilities or maintenance costs.
- Vacancy Rates: Represents how much space per-square-foot (psf) is vacant in a submarket.
- Deliveries: Represent the total amount of new square feet of each product type that has been added to the market on an annual basis.
- Net Absorption: Represent annual net square feet of new occupancy or vacancy of space accounting for deliveries.

Key Commercial Real Estate Market Findings

- Office: The Vancouver office market is small but appears stable in the years since the COVID-19 pandemic. Steadily increasing rents and low vacancy rates suggest a reasonably strong office market. While the region has struggled with office space absorption since 2020, Vancouver has seen positive absorption of new office space post-pandemic, despite minimal construction of new office space over the past five years. While the long-term impacts of the post-COVID hybrid work environment are unclear, recent feedback from stakeholder engagement across the region indicates that businesses renewing leases are typically occupying less space (30% on average) and seeing a relocation to higher class space. This indicates that Class-A office space will have more rapid absorption compared to Class-B and Class-C office spaces across the region.
- Industrial: Vancouver accounts for a lower share of Clark County's total industrial market compared with its clear influence in office and retail, and only about 64% of

new industrial space over the past fifteen years. Within the region, Clark County accounted for only 12% of the total industrial inventory in 2023 YTD. Slightly lower rents, increasing vacancy rates, and negative absorption in Vancouver and Clark County compared with the region in 2023 YTD indicate a weaker market for industrial real estate. These data, combined with declining employment numbers in manufacturing and decreasing location quotients in Transportation and Warehousing and Manufacturing sectors (shown in Exhibit 45 and Exhibit 46 of Section 3) could indicate a shift in Vancouver's economy away from traditional industrial uses.

- **Retail:** Like office space trends, Vancouver's retail market dominates the total inventory in Clark County, with 85% of Clark County's total retail square footage located in the city. Rents for retail space in Vancouver were slightly higher compared to the four-county metro area as a whole in 2023, and new deliveries in Clark County accounted for about 29% of all new retail space in the four-county metro area. This indicates that there is growing demand for retail space in Vancouver and Clark County. However, as new construction (referred to below as 'deliveries') have slowed since 2007 and the city sees a decreasing amount of large format sites, the City may see more infill and neighborhood-scale retail development rather than larger establishments.

E-Commerce Trends

During the onset of the COVID-19 pandemic, demand for e-commerce (online sales of goods that are shipped to customers) rose sharply compared to brick-and-mortar retail as communities practiced social distancing.[26] This trend was partially driven by the availability of large platforms like Amazon, but also drove many small retails to adopt an online presence while competing with larger and more well-resourced firms. However, four years after the initial onset of the pandemic in 2020, vacant real estate space is historically low nationwide despite high interest rates and increasing customer preferences for 'experiential retail' that offers unique or engaging experiences.[27] Following this national trend, Vancouver, Clark County, and the 4-County Metro Area are all seeing comparatively low rates of retail vacancies than the early and mid 2010's.

[26] International Trade Administration, 'Impact of COVID Pandemic on E-Commerce,' https://www.trade.gov/impact-covid-pandemic-ecommerce.

[27] Boston Business Journal, 'Thriving in 2024: Brick-and-mortar retail is back in fashion,' https://www.bizjournals.com/boston/news/2024/01/18/thriving-in-2024-brick-and-mortar-retail-is-back.html.

Commercial Real Estate Market Trends

Office Submarket

Office rents in Vancouver have steadily risen over the past decade, with the current rate of $24.99 psf. The city and Clark County have followed very similar trajectories over this time period, with the County overall tracking only slightly behind the city in rents. Both areas offer a lower cost per square foot than the average across the four-county Portland Metro Area (includes Clark, Multnomah, Clackamas, and Washington Counites).

The similarity between Vancouver and Clark County reflects the fact that most of the total County office inventory is located in Vancouver rather than outlying suburban areas. In 2023 YTD, 808 of Clark County's 946 office buildings were in the city, comprising 88 percent of the total square footage.

As rents have risen, office vacancy rates in Vancouver have trended downwards since 2008, alongside jurisdictions in the region. Despite a modest spike in vacancy in 2020 aligning with national trends at the onset of the COVID-19 pandemic, Vancouver now stands at a relatively low vacancy rate of 5.3% while vacancy rates stood at 11.1% across the greater region, continuing on an upward trend in 2023 YTD.

Exhibit 51. Average Office Rent per Square Foot, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar

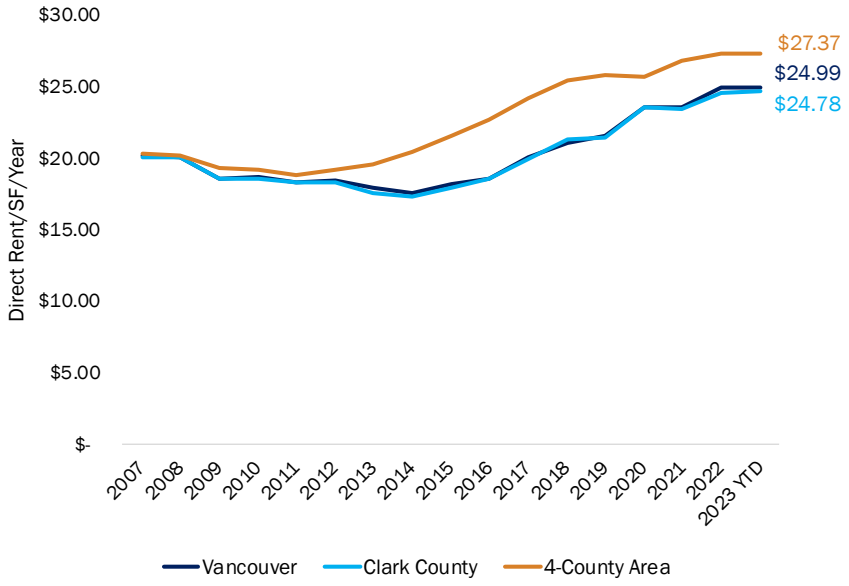
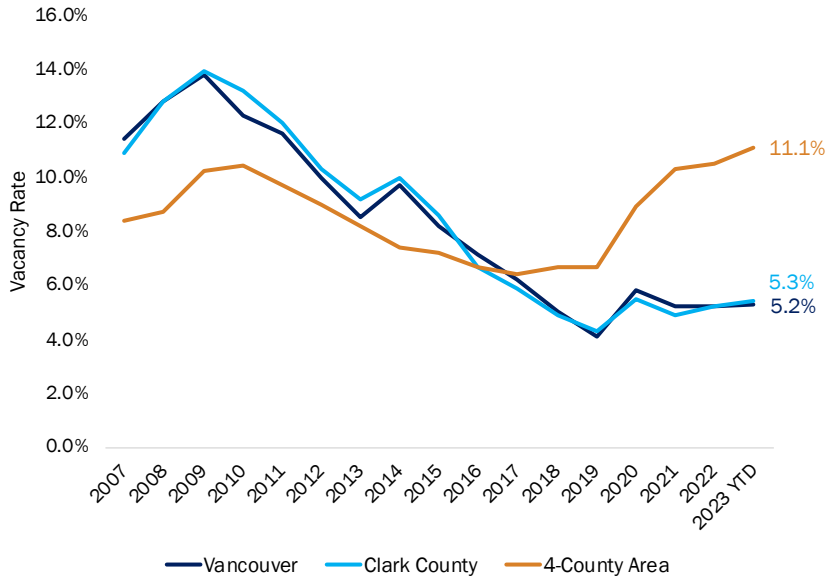


Exhibit 52. Average Office Vacancy Rate, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 Year to Date (YTD)
Source: CoStar



As with rents, Clark County and Vancouver have maintained similar vacancy rates over time since Vancouver has the majority of the County's office space.

In the greater region, office space has struggled with absorption in recent years, but net absorption of office space in the Vancouver market has generally been positive absorption since 2007. The greatest square footage was absorbed in 2016, 2007, and 2012, but managed to remain positive (contrary to regional trends) following the pandemic. Vancouver only saw negative absorption in 2020, as cities across the United States struggled with the impacts of the COVID-19 pandemic.

Similar absorption patterns in Clark County and Vancouver indicate that much of the new office space being absorbed into the market is within the city.

Vancouver's new office spaces are just one portion of the overall four-county area, with the majority of new office space delivered elsewhere in the four-county area. 2007 and 2008 saw the greatest square footage of office space delivered in Clark County, with the majority of new office space in Vancouver.

Over the past fifteen years, approximately three quarters of new office space delivered has been in Vancouver, with 1.9 million square feet added in this time period.

Exhibit 53. Office Net Absorption, City of Vancouver, Clark County, and 4-County Area 2007 to 2023 YTD
Source: CoStar

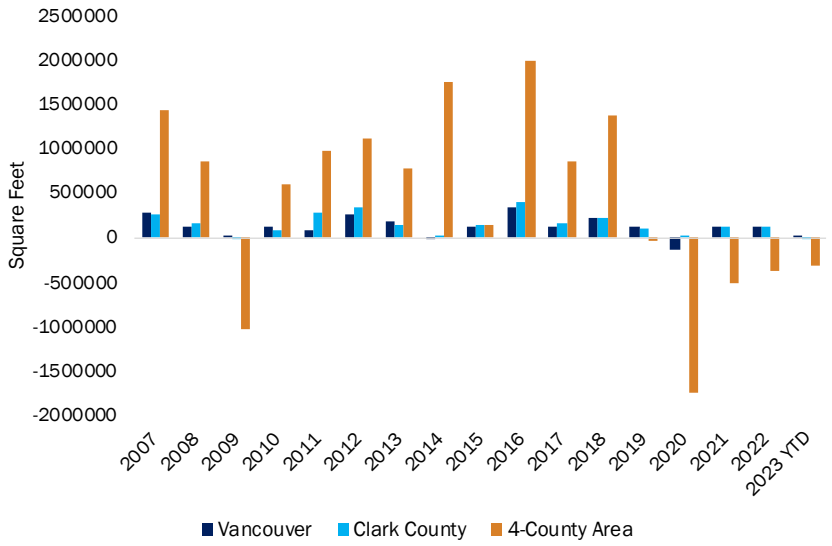
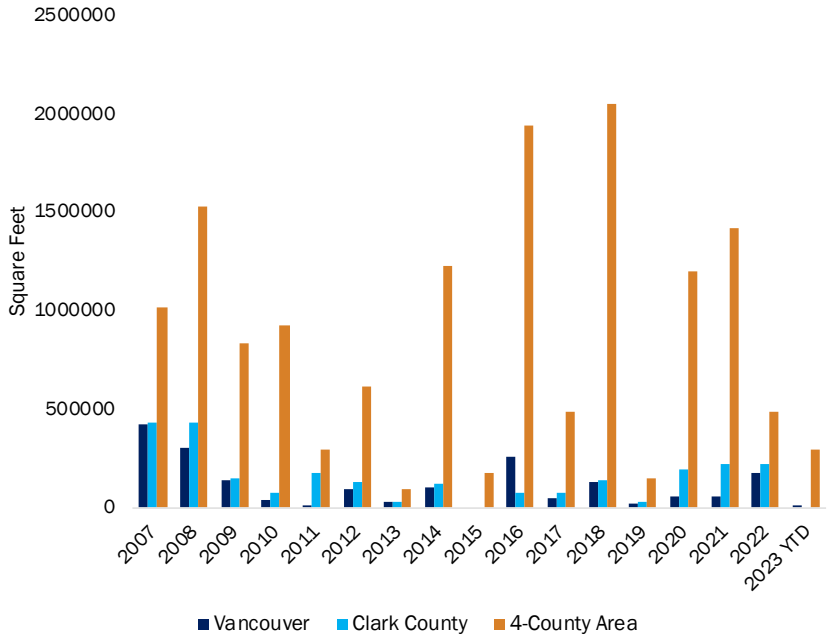


Exhibit 54. Office Deliveries, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar

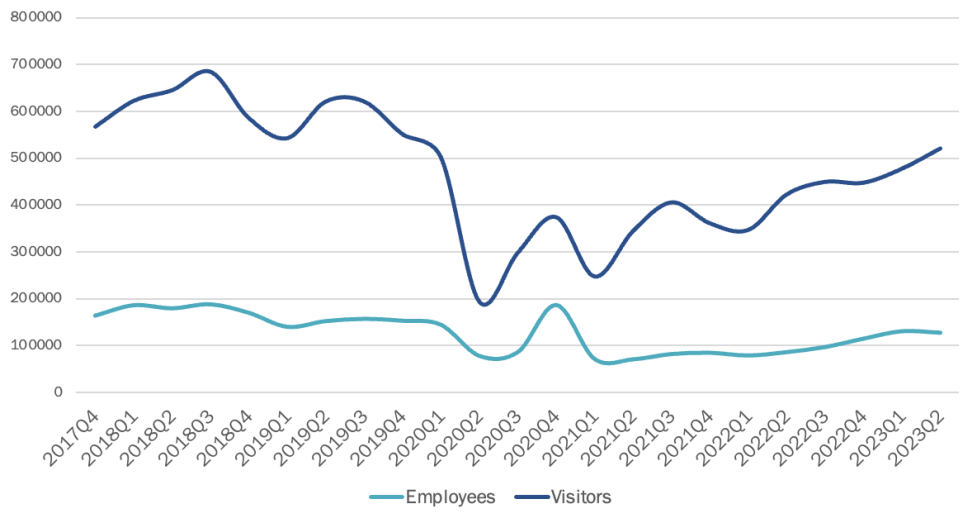


Downtown Post-COVID Trends: Employment and Visitation in the Vancouver Center City Vision Subarea

Within Vancouver, there are submarkets with distinct trends that have citywide implications. The Vancouver Center City Vision (VCCV) area is a 130-block area that encompasses Vancouver's downtown and surrounding areas. The VCCV is a central employment hub in Vancouver, and is home to a number of key employers, about 25% of the City's overall office stock, and 44% of Class A office space.[28] Measures of employment and visitation in the VCCV provide insight into how the city is rebounding after the COVID-19 pandemic, using Placer.ai's foot traffic analytics platform integrating proprietary artificial intelligence to estimate the number of visits based on GPS data.[29]

Employment: The number of employees working in the VCCV decreased in Q2 and Q3 of 2020 as a result of pandemic related work-from home restrictions and layoffs. The number of employees working downtown has gradually increased since the beginning of 2021 and appears to have stabilized at a number slightly lower than pre-pandemic levels. While still below pre-pandemic levels, the VCCV has seen more full recovery of employees who work downtown compared to other service-sector based urban employment centers throughout the Portland Region.

Exhibit 55. Vancouver Center City Vision Area Employment and Visitation, 2017 Q4 – 2023 Q2
Source: Placer.ai



Visitation: Like downtown areas around the country, VCCV saw a sharp decline in visitation at the onset of the COVID pandemic in 2020 Q1. Foot traffic in the VCCV has been on an upwards trajectory since the pandemic, as visitors returned to the area for shopping, recreation, or other purposes, but visitation has not quite rebounded to pre-pandemic levels. Visitor trends continue on an upward trajectory demonstrating the strength of the VCCV as a destination in the region.

[28] The office building classification system divides buildings into three categories: Class A, Class B and Class C. Definitions for Class A Office vary, but are generally based on higher quoted rents, and above average building systems and services, tenant and building finish, and location.

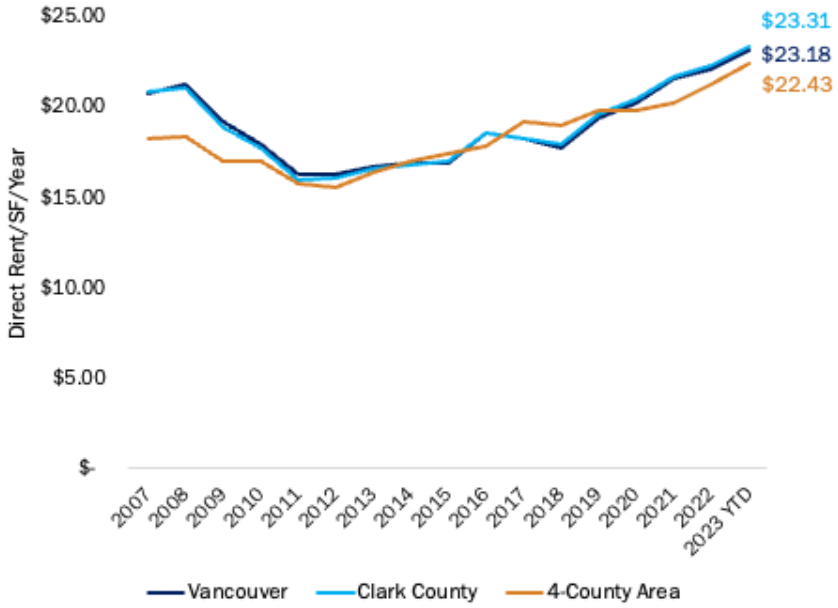
[29] Placer.ai uses anonymous mobile phone location data to estimate visitation. A "visit" is triggered in Placer.ai's database when a cell phone seeks two Wi-Fi signals five to fifteen minutes apart (this range differs by cell phone operating system; e.g., an Android phone

Retail Submarket

Retail rents across the region have been slowly increasing since the Great Recession. In Vancouver and Clark County retail rents rose by 8% since 2010.

Since 2020, retail rents in the City of Vancouver and Clark County have been higher than the average for the 4-county Portland Metro Area (includes Clark, Multnomah, Clackamas, and Washington Counites). Like the office market, Vancouver and Clark County's rents for retail space have stayed closely aligned, with Clark County only $0.13 psf higher than the city in 2023 Year to Date.

Exhibit 56. Average Retail Rent per Square Foot, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar



scans for Wi-Fi every three to seven minutes). While this means that visitors may be counted multiple times, this data is useful to provide a relative picture of trends over time.

As retail rents have risen, vacancies have also declined over the past decade, indicating a growing demand for retail in both the city and county.

Despite a modest spike in 2020 where vacancies reached 4.7%, Vancouver and Clark County returned quickly to approximate pre-pandemic retail vacancy rates. These rates were slightly higher than the four-county area during the pandemic but were approximately on par in 2023 YTD.

Generally, net absorption on retail space has been positive since 2007, with two years of negative absorption in 2009 in the wake of the Great Recession and 2020 at the onset of the COVID-19 pandemic.

For most years in this period, Clark County had slightly higher square feet of net absorption than the city. Trends in Vancouver and Clark County has generally followed the same patterns as the four-county area with a proportionately smaller square footage.

Vancouver saw an influx of retail space in the late 2000's and mid 2010's, trailing off over the past five years. The greatest amount of new retail space was delivered in 2008, with over 900,000 new square feet delivered.

Exhibit 57. Average Retail Vacancy Rate, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar

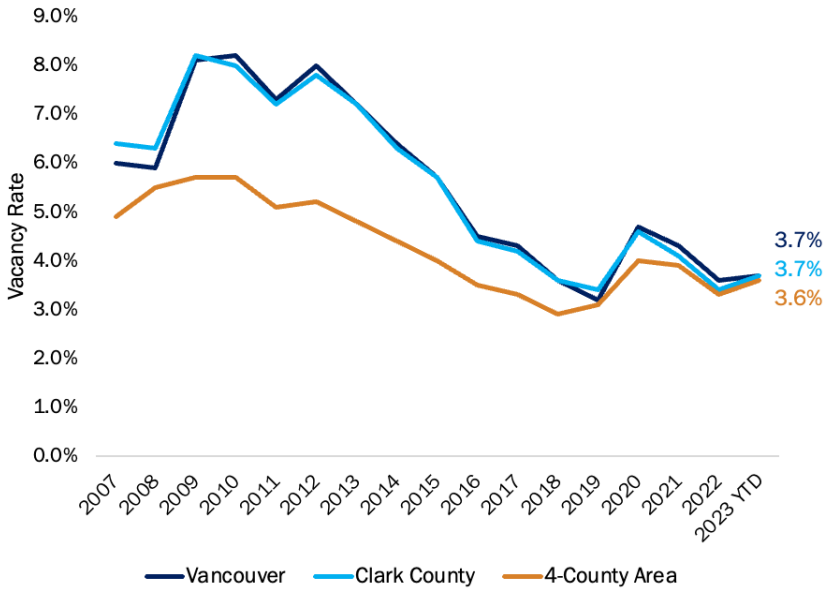
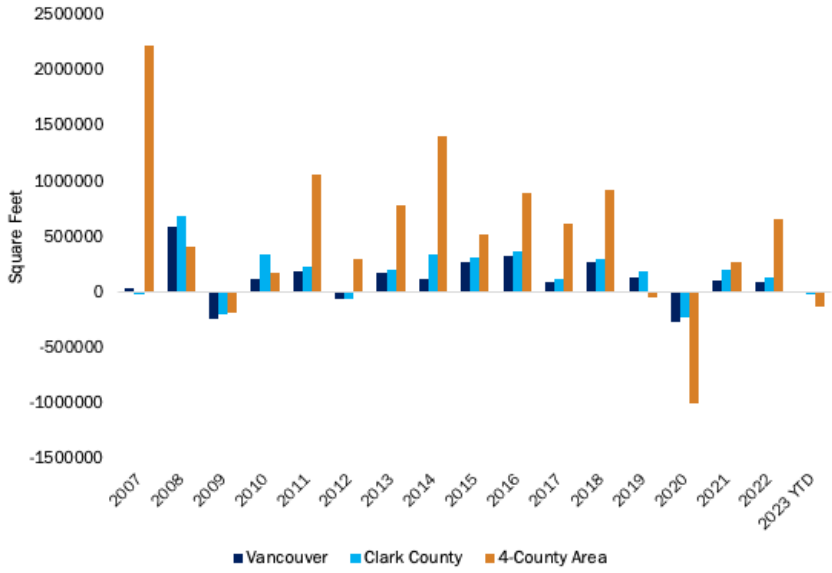
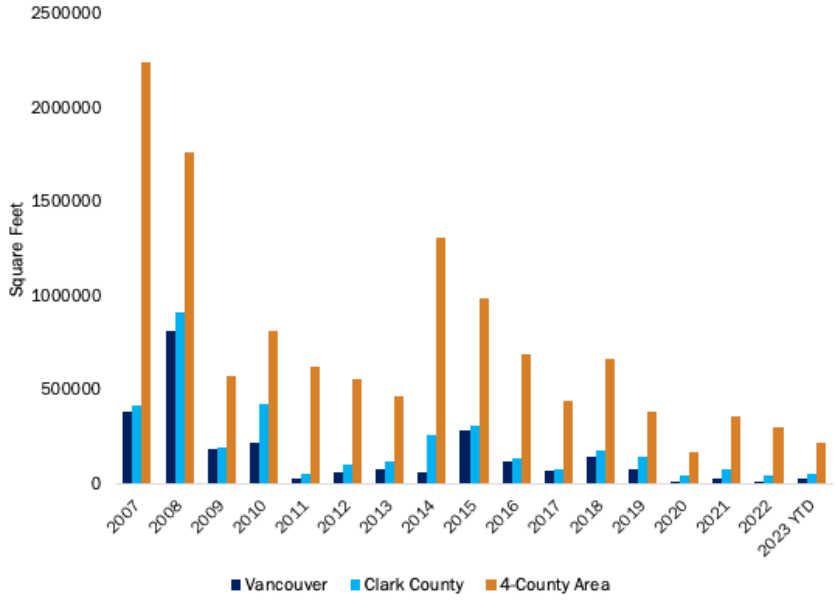


Exhibit 58. Retail Net Absorption, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar



In general, Vancouver's retail deliveries have accounted for the majority of new retail space across Clark County (approximately 74% of new retail). Within the four-county area, Clark County accounts for about 29% of all new retail deliveries.

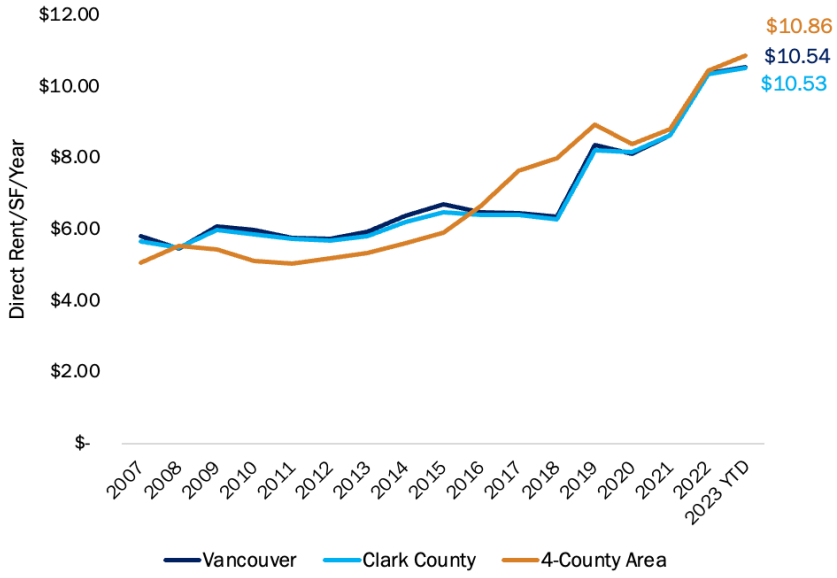
Exhibit 59. Retail Deliveries (New Construction), City of Vancouver, Clark County, and 4-County Area 2007 to 2023 YTD
Source: CoStar



Industrial Submarket

Industrial rents per square foot have been increasing in both Clark County and Vancouver since 2007, sitting at approximately $10.5 psf in both areas (Exhibit 60). The four-county Portland Metro Region had slightly higher rents than Vancouver and Clark County, but generally tracked with the area over the past fifteen years.

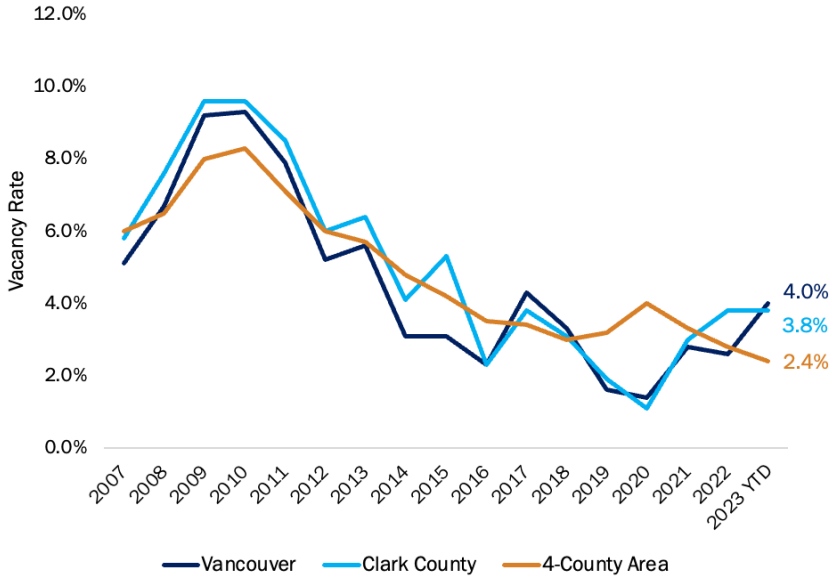
Exhibit 60. Average Industrial Rent per Square Foot, City of Vancouver, Clark County, and 4-County Area 2007 to 2023 YTD
Source: CoStar



Industrial vacancy rates have fluctuated since 2007, declining to their lowest rate in the period during 2020 (Exhibit 61). Both the city and the county currently have low rates of industrial vacancy, though vacancy rates in Vancouver and Clark County have been increasing over the past four years.

Despite lower rents in Vancouver and Clark County, vacancy rates were slightly higher than the four-county area in 2023 YTD.

Exhibit 61. Average Industrial Vacancy Rate, City of Vancouver and Clark County, 2007 to 2023 YTD
Source: CoStar



Industrial deliveries have generally had positive net absorption over the past decade, after struggling in the late 2000's during the recession (Exhibit 62).

Note that negative absorption in year-to-date does not necessarily indicate that a property will not be leased within the close of 2023 and is likely to change.

Unlike the retail and office markets, Clark County has seen a large volume of new industrial space delivered outside of Vancouver, particularly in the past five years (Exhibit 63).

Since 2017, 4.7 million square feet of new industrial space has been delivered in Clark County, with only about half in Vancouver. Throughout the four-county area, Clark County accounted for a proportionately smaller share of industrial deliveries; only about 17% between 2007 and 2023 YTD.

Exhibit 63. Industrial Net Absorption, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar

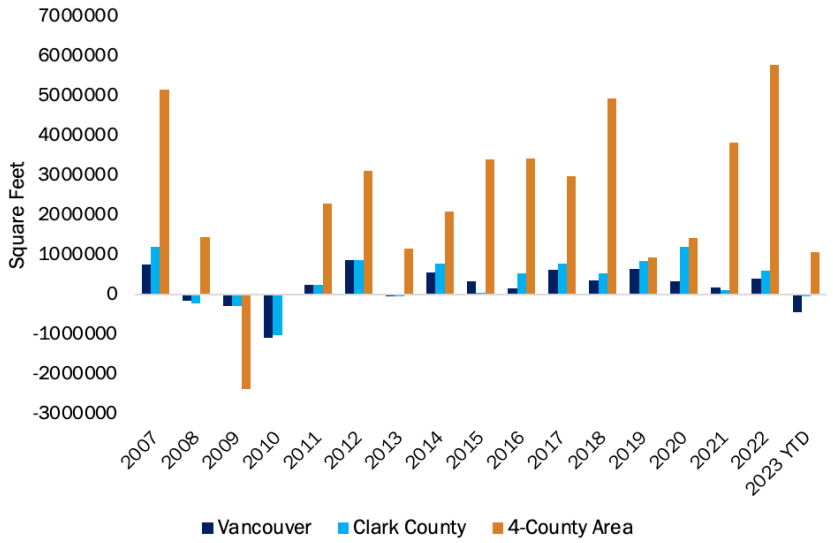
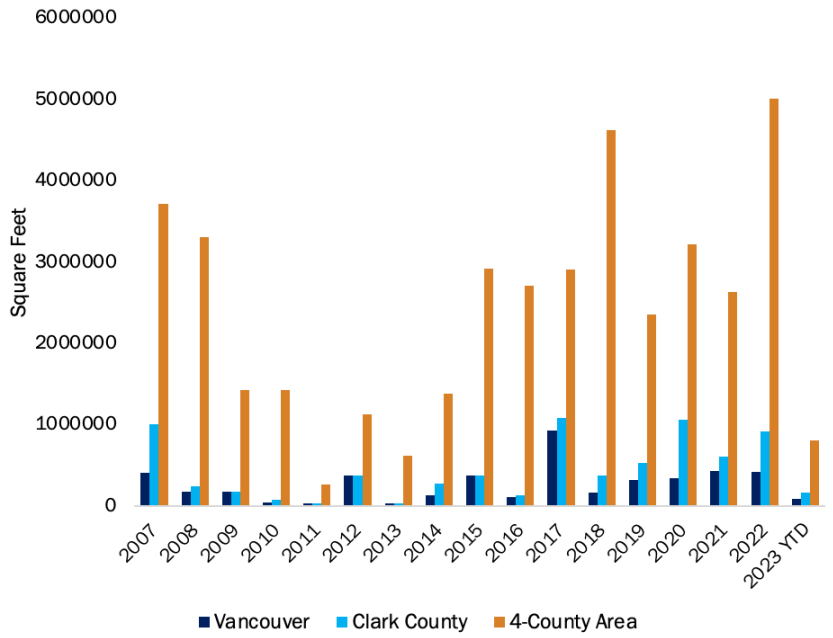


Exhibit 62. Industrial Deliveries, City of Vancouver, Clark County, and 4-County Area, 2007 to 2023 YTD
Source: CoStar



Key Residential Real Estate Market Findings

Housing is increasingly an economic development issue. Housing availability and affordability help determine the size and stability of the local workforce. Rising housing costs and decreasing vacancies, as seen in competitive regions like the Portland metro area, indicate upward pressure on the market. While beneficial for owners and the tax base, high costs and limited availability place a heavy cost burden on renters and homebuyers. Promoting housing options at price points affordable to households at all income levels can help ensure a diversified workforce, create opportunities for upward mobility, attract new talent to the region, and support broader economic development goals. The continuing impacts of historic racial inequities in housing and employment can also be expressed in levels of housing cost burden. These disparities stress the need for equitable economic development that intentionally provides opportunities for Black, Indigenous, and People of Color (BIPOC) residents who have been excluded from building generational wealth due to past discriminatory policies.

This section summarizes key findings for Vancouver from the 2023 Our Vancouver Housing Needs Assessment and identifies key implications for economic development and employment.

Housing Availability

- The local availability of housing within a region can impact economic conditions as households make tradeoffs about where to live and work. Post-COVID remote work trends have provided greater locational flexibility for workers. In recent years the Portland Metro region has also increased transportation options that allow workers to commute more efficiently. The location of available housing and proximity to transit, services, and employment hubs can also influence where individuals seek jobs. Trends in Vancouver and Clark County show that housing underproduction has limited housing supply in both the City of Vancouver and Clark County (as well as the greater region).
- From 2011 to 2021, Vancouver increased its housing stock by roughly 14,700 units, or by 21%, while the total population grew by roughly 23%. Historic and current housing underproduction has limited housing supply in Clark County as well as the greater Portland metro area.
- The dominant type of housing is single-detached comprising over half the housing stock both in Vancouver and Clark County as a whole. However, Vancouver has a lower share of single-detached housing (at 56%) compared to the county's 72%. The remaining housing stock in Vancouver includes an estimated 27% multifamily

housing and 18% "plex housing" which is attached units up to fourplexes (according to U.S. Census data, 2021).

- Vancouver has a higher share of multifamily housing than the county overall, with slightly under half (44%) of Vancouver housing units having more than one unit. Permit data analysis shows a steady increase in multifamily development in the city in recent years.

Multifamily Residential Market

- Vancouver is seeing a steady increase in the annual rate of new units permitted in multifamily development across all scales of buildings, opening up potential new workforce housing units. 79% of new unit construction in the city has been in multifamily developments over the last three years.
- Most apartment construction has been concentrated in the downtown area, with some clusters of multifamily development along Fourth Plain Boulevard and along I-205.
- Since 2015, the most common permitted multifamily building scale was 20- to 49-unit buildings (32% of permitted units), followed closely by 100+ unit buildings (28%). Only 4% of permitted units were in two- to four-unit buildings (or 'middle housing').

Housing Prices and Vacancy

In general, rising housing prices and falling vacancy rates indicate upward pressure on the market for different types of real estate. If workers struggle to find attainable options for their income level near job centers, the lack of housing options can constrain the labor force in an area. The Our Vancouver Housing Needs Assessment highlighted the following trends.

- **While the City's housing costs remain lower than Clark County overall, vacancy rates have remained stable at about 5 percent since 2012.** Vacancy rates for rental and multifamily units are typically higher than those for owner-occupied and single-family dwelling units. In Vancouver, the vacancy rate fluctuates between 2% and 5%; it is currently 4% in Clark County. The city's vacancy rate has remained in this low range since 2011.
- **Rents are rising in Vancouver.** Rents in Vancouver are very similar to the county overall. As of June 2023, the average rent in Vancouver is $1,711, increasing 60% since 2012. The Vancouver Housing Needs Assessment shows that in Vancouver,

cost burden rates for renters tends to be higher and growing which could indicate a lack of affordable rental housing options.[30]

- **Home sale prices are also rising in Vancouver but remain lower than Clark County.** As of June 2023, the median home sale price in Vancouver is roughly $477,000. The city's home prices are roughly $50,000 lower than the county overall and lower than the national average. Vancouver's home prices increased at a similar rate since 2012, nearly tripling (a 174% increase) over the last decade. Home prices in Vancouver are lower than several competitor cities in the Portland metro area, including Portland, Beaverton, and Hillsboro. However, home prices in other jurisdictions dropped from 2022 to 2023, while Vancouver and Clark County home prices continued to grow, indicating a strong demand for homes at lower price points.
- **Cost burden has impacted renters more than homeowners.** Rates of cost burden for renters have increased slightly since 2011 (by 3 percentage points) but dropped significantly for homeowners (by 12 percentage points). Renters are nearly three times as likely to be cost burdened than homeowners, with over a quarter of renters severely cost burdened, spending more than 50% of income on rent. In Vancouver, Black or African American households and Hispanic or Latino households experience the highest rates of cost burden and severe cost burden. Lastly, Vancouver's median household income increased by 28% from 2011 and 2021 which is far less than the increases in median home sales prices and average rents.

[30] Housing cost burden can be an indicator of determining how well a city is meeting its need to provide housing that is affordable to all segments of its workforce and population. Housing costs are typically the largest portion of a household budget, and typically include mortgage or rent payment, utilities, interest, and insurance. Housing cost burden can put low-income households in vulnerable situations which can also lead job instability, among other negative outcomes. In a connected region like the Portland metro, households may make the decision to live and work in areas with lower housing costs relative to their income.

Section 5. Competitive Advantages

Vancouver has a number of competitive advantages today that make it an attractive location for businesses and workers, including its high quality of life, tax advantages, and well-connected multimodal infrastructure. These primary factors contributing to Vancouver's growth should be considerations as the City plans for continued economic development work in the next 20 years with the Growth Management Update. Continuing progress like public realm investments, supporting workforce housing, and strategically planning for employment growth using the City's buildable lands will be critical to build on the City's current strengths.

Vancouver Offers Access to Quality-of-Life Amenities at a Lower Price Point.

Vancouver's proximity to the Columbia River Gorge, Mount St. Helens, and national forests throughout southern Washington and northern Oregon offer access to abundant outdoor recreation activities. The city's downtown area has a vibrant and growing mix of food, beverage, and entertainment assets. The natural beauty and robust amenities in the region as well as farmland create a lifestyle draw for Vancouver.

Compared with other west coast areas that offer similar access to recreation, Clark County presents an option with a relatively lower cost of living, and more affordable prices for homes as well as industrial and office space.[31] As more workplaces become flexible or rethink locational decisions in the wake of the COVID-19 pandemic, many are choosing to move to places that offer lifestyle advantages for workers as well as lower cost commercial space and relatively affordable homes.

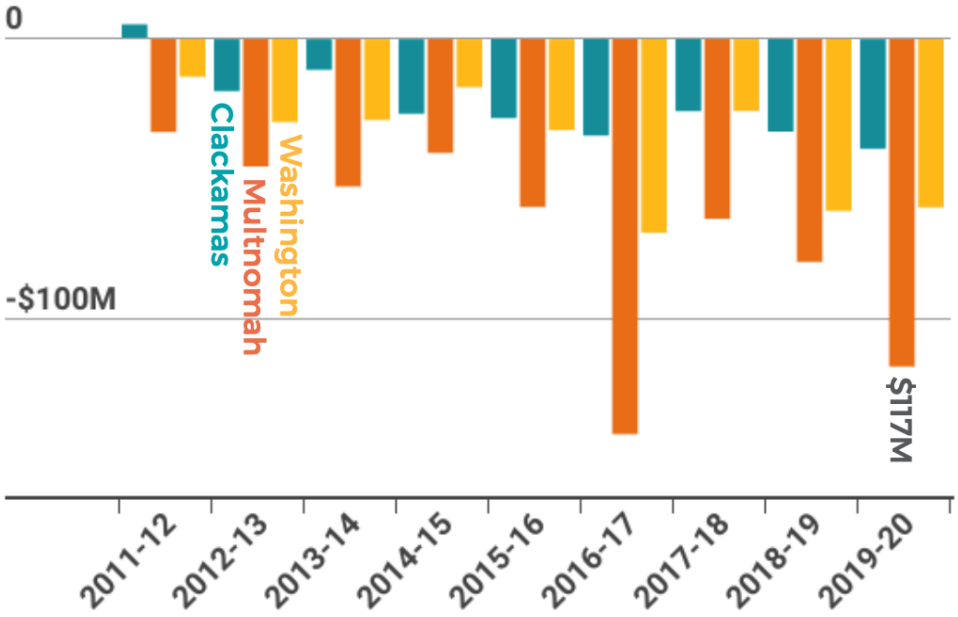
Vancouver's Location on the Oregon-Washington Border Allows Tax Advantages to Attract Residents and Businesses.

For businesses and individuals deciding on a location within the Portland region, the different tax structures available in Oregon and Washington can be a critical decision point. Given the short distance between Portland and Vancouver, residents and businesses can continue enjoying many of the same regional amenities and destinations while decreasing the share of household income paid towards income taxes.

[31] Columbia River Economic Development Council, "Clark County Business Guide," 2022.

Washington's lack of corporate or personal income tax compared with Oregon's absence of sales tax presents two distinct options that can have different advantages for households and businesses. In recent years, Portland Business Alliance's analysis of data from the Internal Revenue Service (IRS) indicates that more firms and households are making the decision to relocate to Clark County from the Portland metro region counties in Oregon, with $117 million net migration of tax revenue to Clark County in FY 2019 to 2020 (Exhibit 64).

Exhibit 64. Net Migration Flow of Tax Revenue to Clark County, WA by Adjusted Gross Income Between Tax Years (in Nominal Dollars)
Source: Internal Revenue Service, Portland Business Alliance



Vancouver is Part of a Well-Developed Higher Education and Workforce Development Ecosystem.

Vancouver is home to Clark College and Washington State University's Vancouver Campus, with regional connections to additional higher education institutions in Portland including Portland State University. Through partnerships with key industries, these institutions have partnered to build pipelines to job opportunities in well-paying careers like semiconductor manufacturing, software engineering, and others.

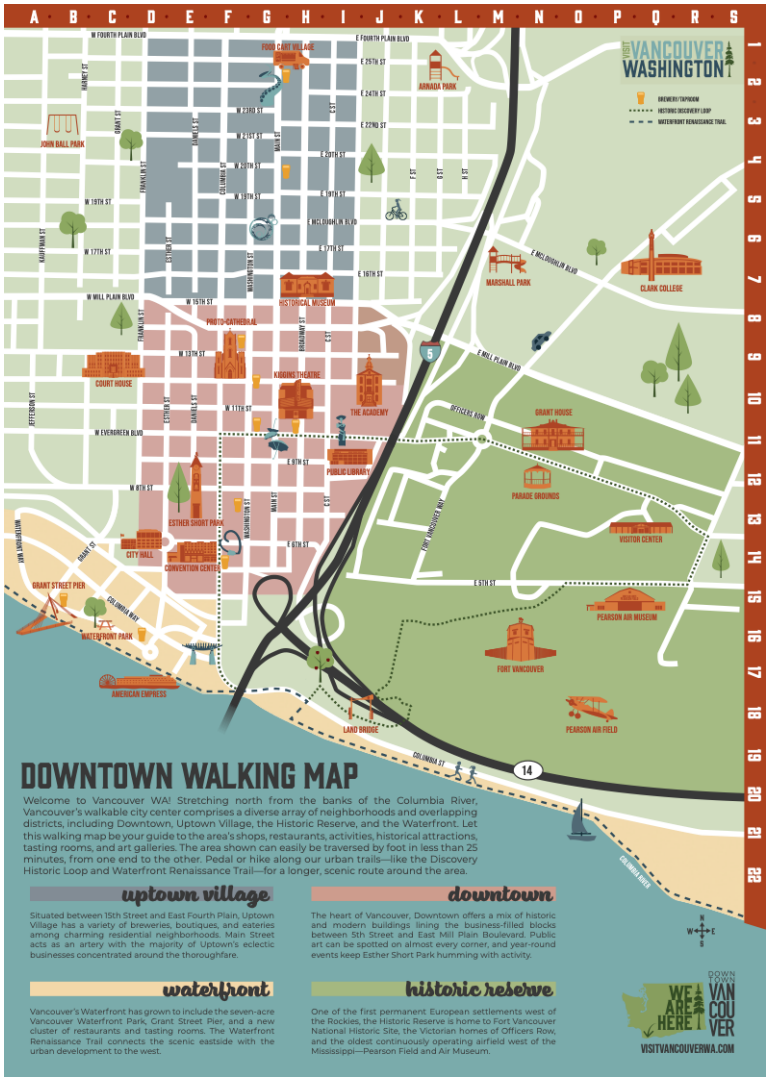
As educational attainment levels rise for the residents of Vancouver, more opportunities become unlocked to attract more employers in high-paying, high-opportunity careers. However, ensuring that these opportunities can equitably reach communities in Vancouver is a key consideration for leveraging the City's competitive advantages to benefit all residents. Career Technical Education (CTE) can help to fill gaps for many residents by providing technical training for a broad range of workers.

The City's Public Realm Investments Have Expanded Access for Jobs and Residences in Vancouver, and There is More to Come.

In the past five years, the City of Vancouver has made large public realm investments in its Downtown area and other parts of the city, including transportation improvements, beautification, and public-private partnerships. Over $1.5 billion for downtown waterfront improvements have supported development of new public space as well as businesses and housing.

These investments have paid off with increasing private investment and quality public spaces for Vancouver, with well-developed sub areas like the Vancouver Waterfront. In the coming years as the city continues to build a stronger sense of place, investments in public realm improvements and partnerships can continue to build Vancouver's competitive advantages for attracting residents.

Exhibit 65. Downtown Walking Map of Vancouver
Source: Visit Vancouver



Planning efforts are also underway for replacing the I-5 bridge. Though this long-term project faces the challenges of updating major regional infrastructure, bridge replacement will be a transformative investment once completed, allowing for expedited passenger and freight travel across the Columbia River. ODOT and WSDOT are jointly leading these efforts in coordination with eight other bi-state partner agencies: TriMet, C-TRAN, Oregon Metro, the Southwest Washington Regional Transportation Council, the cities of Portland and Vancouver, and the Ports of Portland and Vancouver.

OUR VANCOUVER

OUR FUTURE 2045



COMMUNITY ATLAS: EXISTING CONDITIONS REVIEW

August 2023

Prepared by

DESIGNWORKSHOP

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KEY DEFINITIONS

CONNECTED + ACCESSIBLE NEIGHBORHOOD

The connected and accessible neighborhood is a planning concept that focuses on access to services and amenities as a measure of equity. A 15-minute walk, roll, or bike ride is the threshold used to define reasonable access.

AMENITIES

Urban services like public parks, libraries and grocery stores that should be accessible within a 15-minute walk or bike under the 15-minute neighborhood concept.

BIPOC

Black, Indigenous, (and) people of color.

BROWNFIELD SITE

Sites defined by the United States Environmental Protection Agency that are (potentially) contaminated by a hazardous substance or pollutant.

CO-CREATIVE PROCESS

A planning process that is guided collaboratively by community members, experts, and a range of stakeholders.

EQUITY

Applying an equity lens to planning processes to ensure "just and fair inclusion into a society in which all can participate, prosper, and reach their potential" (APA Planning for Equity Policy Guide).

LIVABILITY

Factors that contribute to a community's quality of life, including its environmental, economic, and social wellbeing.

PROTECTED HABITAT AREA

Locations that require particular consideration during the development process because of their ecological significance.

SPECIES AREA

Areas with a particular concentration of species biodiversity.

SUPERFUND SITE

Sites designated by the United States Environmental Protection Agency that require long-term remediation and monitoring due to contamination by a hazardous substance or pollutant. These sites include manufacturing facilities, processing plants, landfills and mining sites.

SUSTAINABILITY

Practices that avoid the depletion of natural resources in order to maintain an ecological balance.

URBAN GROWTH AREA (UGA)

Planning areas defined as part of a city's long-term planning effort where urban growth is encouraged. The UGA encourages development that preserves open space, promotes density, and reduces sprawl.



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INTRODUCTION





Figure 2: I-5 Sunset

COMMUNITY ATLAS: EXISTING CONDITIONS REPORT

In 2022, the City of Vancouver initiated an update to its Comprehensive Plan and Title 20 Code Update. As part of this process, the City has embarked on a co-creative process with the community of Vancouver to ensure an equitable engagement and outreach process. The City strives to acknowledge past actions that have influenced historic development patterns and generate a collective vision for the future.

In order to accurately capture existing conditions within Vancouver, the planning team has conducted an analysis of current information pertaining to the natural environment, land use and zoning, community demographics, cultural resources, economy, the built environment, parks, recreation, trails and open spaces, public facilities, and a review and audit of the existing comprehensive plan and supplemental plans. This analysis constitutes the Community Atlas document.

WHAT IS THE PURPOSE OF THE COMMUNITY ATLAS?

The Community Atlas is a document intended to support the City's planning efforts as it updates its Comprehensive Plan and Title 20 Code. This document contains information on the City's core values and existing conditions including statistics, data and mapping, and an assessment of Vancouver as a 15-minute neighborhood, in a user-friendly format, all meant to inform baseline analyses for the development of the Comprehensive Plan.

By capturing this information in one document, the City will be able to reference the Community Atlas at regular intervals during the horizon of the Comprehensive Plan to provide the community with updates on implementation progress.

WHAT DOES IT INCLUDE?

Within each chapter of the Community Atlas there are narratives, maps, imagery and statistics that provide current community information available to support long-range planning efforts for the Comprehensive Plan and Title 20 Code Update. The Community Atlas chapters are:

1. Introduction
2. People
3. Natural Environment
4. Cultural Resources
5. Built Environment
6. Economy
7. Parks, Recreation, Open Spaces and Trails
8. Regulatory Framework Assessment

WHY IS THE ATLAS IMPORTANT?

The City of Vancouver is expected to reach a population of 268,000 residents by the year 2042.[1] This is in part due to growth trends seen in the region, with an estimated increase of 18% in population between 2010 and 2020.[2] Vancouver is growing in response to several factors including increased immigration to the region, urbanization and increased development.

These trends are influenced by local, county and state policies that were created to sustainably manage growth over time - this includes policies like the City of Vancouver's Urban Annexation Blueprint Plan (2007), the County Comprehensive Growth Management Plan and the State of Washington Growth Management Act.

The City of Vancouver last updated their Comprehensive Plan in 2011 - which will require the chapters, or 'elements', to be updated to mirror not only the new requirements of the Growth Management Act but also reflect current City policies which include other guiding documents such as the Strategic Plan, the Transportation System Plan, and the Climate Action Framework.

WASHINGTON GROWTH MANAGEMENT ACT

In 2023, the State of Washington Legislature updated its approach to how communities are required to plan for housing to meet more immediate needs and to prepare for long-term growth. House Bill 1220 (HB 1220) requires communities to plan for the creation of housing which is affordable to all community members at all income levels. This Bill also changed how municipalities have to plan for updates to the housing elements in comprehensive plans.

WHAT INFORMS THE COMMUNITY ATLAS?

The Atlas is a document informed by others - it relies on current population projections from the 2020 Census and subsequent American Community Survey updates, ESRI GIS and analyst data, existing City of Vancouver policies and documents, Clark County policies and state legislative changes. While not an extensive list, the following documents were consulted during the creation of this document:

- City of Vancouver Strategic Plan: 2023-2029 Update
- 2011 Vancouver Comprehensive Plan and Zoning Code
- Subarea and Action Plans
- Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022
- City of Vancouver Diversity, Equity and Inclusion Strategic Plan
- Reside Vancouver: An Anti-Displacement Strategy
- City of Vancouver Climate Action Framework
- Transportation System Plan
- City of Vancouver Consolidated Housing and Community Development Plan
- Urban Forestry Management Plan
- Main Street Promise
- City of Vancouver Shoreline Master Program
- Clark County Comprehensive Economic Development Plan 2018-2023
- Clark County Countywide Planning Policies
- An Ethnohistorical Overview of Groups with Ties to Fort Vancouver National Historic Site
- Washington Transportation Plan 2035
- State of Washington Growth Management Act

These documents provided a basis for capturing the existing conditions outlined in this Community Atlas and the initial 15-minute neighborhood analysis.

CITY OF VANCOUVER'S STRATEGIC VISION

The City of Vancouver has a Strategic Plan that is updated every 6 years in order to define the City's vision and core values, and understand what the City needs to prioritize and invest in.

The City recently adopted the 2023 Strategic Plan - which outlines key priorities through 2029 - and takes into account existing and future City limits. Building on the previous 2016 Strategic Plan and robust engagement efforts, a series of core values and focus areas have been defined and serve as the foundation of the document.[3]

LIVABILITY

Livability for Vancouver is about ensuring that residents have access to basic necessities, requirements and experiences, and a quality of life.

It also means that there should be a focus on ensuring that every resident and cultural group can live in Vancouver and feel a sense of pride and belonging all while maintaining individual and cultural identities, beliefs and values.

An emphasis on safety, access, opportunity, inclusivity, and equity will lead efforts to provide for a clean, safe City that welcomes and enables residents of all ages and abilities to feel nurtured and valued while comfortably accessing public spaces, programs, resources, economic opportunities, education, and affordable housing.

SUSTAINABILITY AND RESILIENCY

The City is focused long-term solutions to sustainability and resiliency which include economic, environmental and social issue crisis management, in addition to a focus on environmental justice for all Vancouver communities. Additionally, the City seeks to build structures that take into account expanding and evolving green technologies.

The City is focused on a proactive and goal oriented approach to protecting natural resources, reducing greenhouse gas emissions, introducing forward-thinking nature-based solutions, and planning for crisis management.

INNOVATION

The City of Vancouver wants to invite and encourage creative thinking in order to promote the well-being of residents. For Vancouver, innovation includes technology, infrastructure, programs, climate change, and business to ensure that the City attracts and retains businesses and jobs.

Creative problem solving, adapting to change, creating space for creative communities, collaborating, and adapting to changing trends will ensure that Vancouver continues to confront barriers to innovation and ensure that the City invests in its future.



Figure 3: Bike Lane



Figure 4: Farmers Market Day of the Dead

EQUITY AND INCLUSION

Equity and inclusion focused policy will enable Vancouver to be a place where all people are able to express their beliefs and values freely and safely. The City celebrates different perspectives, cultures, activities and people, and wants to provide access to opportunities through investments and accounting for historical policies that have led to inequities across Vancouver communities. This includes breaking down and eliminating barriers that have affected communities of color, religious minorities, people with disabilities, LGBTQIA+ communities, and other disadvantaged communities.

Through nurturing and valuing all community members and ensuring equitable access to resources, and fair and transparent processes, the City will provide inclusive economic opportunities.

TRUST AND RELATIONSHIPS

The City of Vancouver Strategic Plan emphasizes the importance of trust and relationships - specifically between the City government and the Vancouver community. Transparent processes and decision-making are integral to creating a community that is livable, equitable, and resilient and where community members, businesses, and residents are engaged and participate in City programs and initiatives.

The City understands how important trust is to effecting community safety, and that the relationship between the community and law enforcement will require building, repairing and maintaining relationships and ongoing collaboration and inclusion. Specifically, focusing on equity, accountability, respect, strong partnerships, representation, fairness, kindness, and honesty.

The City believes that investing in community relationships will benefit all people in the Vancouver community and will serve to create a place where officials and residents have trust in each other.

PLANNING FOR CONNECTED AND ACCESSIBLE NEIGHBORHOODS

WHY ARE CONNECTION AND ACCESSIBILITY IMPORTANT?

The connected and accessible neighborhood is a planning concept that aligns with the vision and goals of the 2023 Strategic Plan. It envisions neighborhoods where residents have access to basic needs, essential services and amenities, such as grocery stores and libraries, within in an easy 15-minute walk, bike or roll. It increases livability and equity-minded policies while supporting sustainability goals.

This type of development pattern represents an equitable distribution of amenities, services, and facilities due to their accessibility. Such services and amenities include grocery stores and markets, transit stops, parks and open space, trails, schools, libraries, hospitals and urgent care facilities.

In plans such as the Heights District, the City of Vancouver used a 20-minute walk to services and amenities as a metric. This was historically best practice, but this policy direction is more ambitious, adopting a 15-minute walk as the goal to equitably increase access to essential services across the city.

To define this concept for Vancouver, the Community Atlas identifies essential services and amenities within the City and analyzes their locations. The graphic below illustrates what should be accessible to residents within a 15-minute walk, bike or roll. The subsequent map identifies what areas in Vancouver are close to meeting connected and accessible neighborhood goals, and which areas need additional considerations.

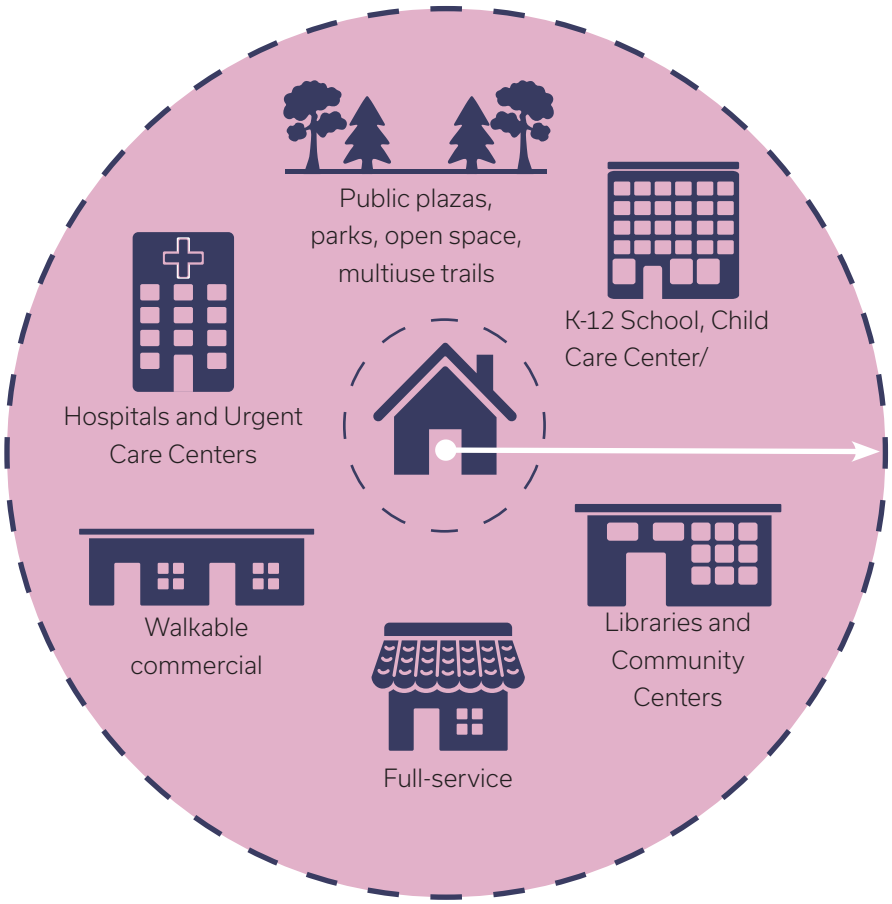

Figure 5: Connected and Accessible Neighborhood Illustrative Graphic

MAPPING METHODOLOGY

A majority of essential services are located in central Vancouver. By identifying where essential services are currently located, decision-makers can plan for where additional services need to be developed into the future or where density could be added to take advantage of existing services. This framework has been used to develop an initial understanding of where development should be focused into the future to ensure services are accessible.

Over the past few decades, Vancouver has experienced a significant increase in diversity. This has also brought to light various socioeconomic challenges and the need for cultural awareness and inclusivity. Diversity, equity, and inclusion (DEI) efforts are vital, particularly for historically underrepresented groups and individuals. Vancouver aims to promote fair and full participation of all residents and community members regardless of race, gender, sexuality, identity, or disability.

Understanding current DEI concerns is crucial for developing an equity framework that addresses privilege imbalances and the interconnected issues faced by different communities. Vancouver utilizes equity principles and guidelines to create a more inclusive City and protect underrepresented community members. Communities at risk, including Black or Indigenous people, people of color, people with low incomes, people with disabilities, renters, LGBTQIA+ individuals, homeless individuals, and small business owners, will be prioritized in the City's efforts to ensure equity and inclusion for all.

The Community Atlas focuses on access to essential services as a means to inform equitable development.

To measure access to essential services, the Community Atlas uses a walkshed: the area within a particular walking distance (in this case 15 minutes) from a point of origin. The density of walksheds is determined by the number of paths or walksheds in a specific area. The more overlapping walksheds there are in an area, the higher the walkshed density. A higher walkshed density indicates a more accessible Vancouver, as it communicates the number of destinations reachable within a certain walking distance.

To establish an access to services map illustrating walkshed density, an individual walkshed analysis by essential service type was calculated, then synthesized to create the composite maps on the following pages.

For this analysis, the following walksheds were considered: full service groceries, transit stops, parks and open spaces, trails, libraries, ambulatory healthcare services, and schools. This is illustrated on the map on the next page.



Figure 6: Vancouver Public Library

CHAPTER SOURCES

1 City of Vancouver Comprehensive Planning estimate, based on recent growth trends as quantified by the Washington State Office of Financial Management
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3 City of Vancouver 2023 Strategic Plan

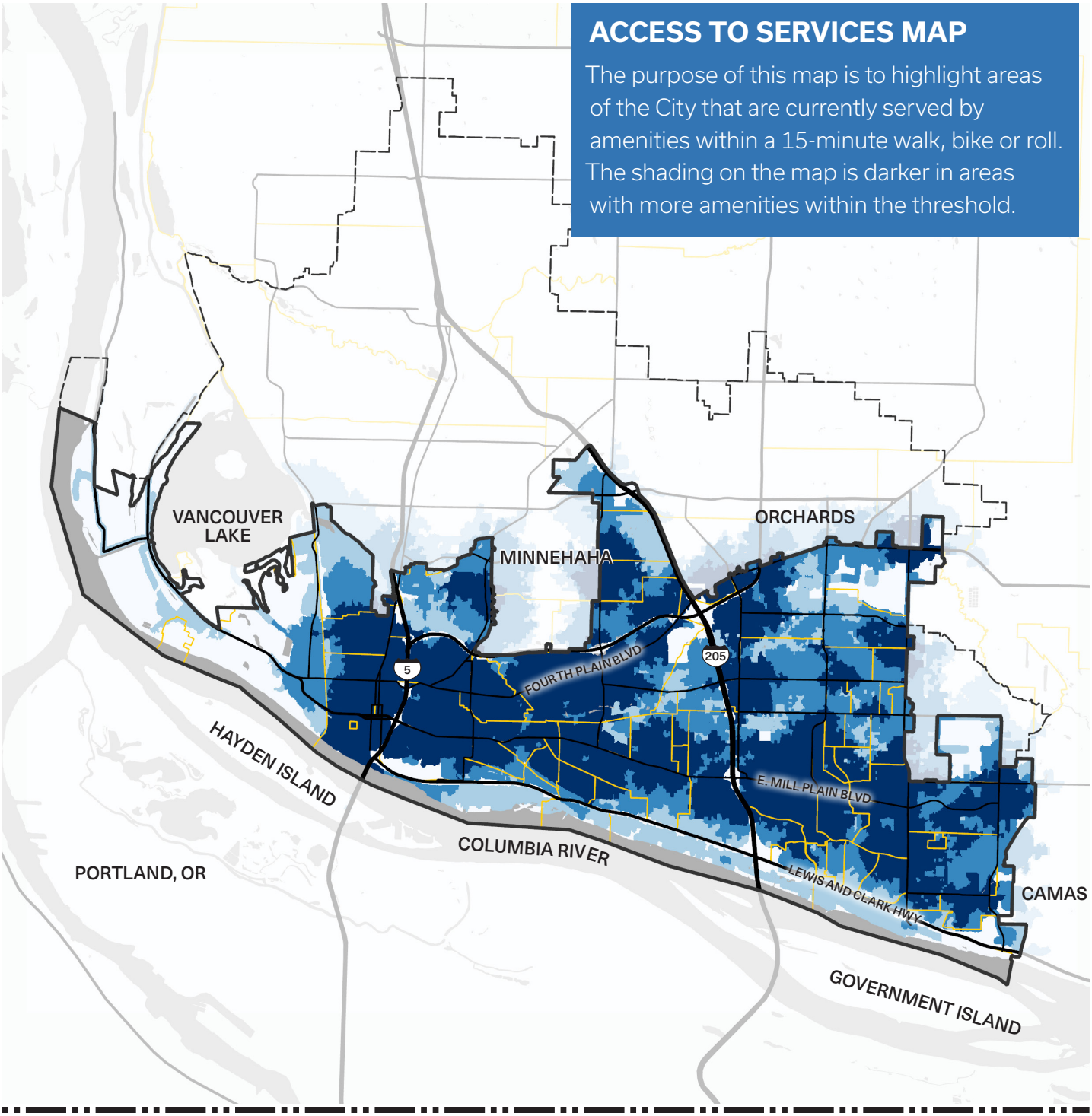


Figure 7: Connected and Accessible Neighborhood Map

PEOPLE



COMMUNITY OVERVIEW

As the City of Vancouver experiences rapid growth, it is prompting local leaders, designers, and the community to think critically when planning for the future of both its community members and unique neighborhoods. There are several factors influencing growth which include proximity to Portland, investments by the City of Vancouver into infrastructure and development, its location along the Columbia River and its thriving and diverse local community.

Understanding how Vancouver has grown since the 2011 Comprehensive Plan is crucial to defining how change has impacted its neighborhoods and development patterns. The following information reflects the research that was conducted as part of the City of Vancouver's Community-At-A-Glance (including source data references). The Community-At-A-Glance document can be found on the City's community engagement website Be Heard Vancouver (www.beheardvancouver.org).

POPULATION TRENDS

Vancouver has witnessed significant population growth over the past decade. The population increased from 161,791 people in 2010 to 190,915 people in 2020.[4] This is a population increase of 29,124 people, an 18% increase in the span of just ten years.[5] This growth trend is projected to continue, with an estimated population of 268,000 by the year 2042.[6] Understanding growth patterns in both Vancouver and Clark County is imperative when it comes to planning and designing for the City's future.

ECONOMY

Vancouver has experienced impressive employment rates in recent years. Employment in Vancouver is concentrated in the healthcare, education, food service, administrative, real estate, business, manufacturing, engineering, construction, transportation, and materials moving industries. The median income of Vancouver's residents increased by 34% between 2010 and 2020, from $47,307 to $63,617.[7] These trends may have changed dramatically due to the increase of population, jobs and opportunity, as well as inflation. However, despite this dramatic increase, Vancouver's median income is still lower than the median income in Clark County ($75,253) and the State of Washington ($73,775).[8]

Vancouver's employment rate is 96.5%, and the unemployment rate was 3.5% as of December 2021.[9] This is slightly lower than the national average unemployment rate of 3.9% noted in December 2020.[10] The average single family home value increased 129% since 2010, which has provided current and new homeowners great opportunities to invest and build wealth.[11]

PROJECTED GROWTH

161,791	POPULATION (2010)
190,915	POPULATION (2020)
195,512	POPULATION (2022)
268,000	POPULATION (2042)



Figure 8: Vancouver Landing



Figure 9: Story Walk

However, the competitive real estate market has posed great difficulties for aspiring homeowners and living costs for the community.

Despite certain positive developments, not everyone has benefited equally and it is important to acknowledge persistent socioeconomic disparities. Approximately 12.7% of individuals in Vancouver have experienced poverty compared to 9.0% county-wide, highlighting the need for ongoing efforts to address income disparities and ensure economic stability for all members of Vancouver's community.[12]

POVERTY

12.7% INDIVIDUALS HAVE EXPERIENCED POVERTY

8.3% FAMILIES HAVE EXPERIENCED POVERTY

In 2021, 20,955 Clark County residents received food stamps or SNAP benefits, indicating a significant number of individuals who rely on food assistance programs.[13]

AGE, ETHNICITY, LANGUAGE, LGBTQIA+ ORIENTATION, RACE, VETERAN STATUS

The City of Vancouver experienced dramatic growth in terms of age, ethnicity, language, LGBTQ+ orientation, race, and veteran status over the past decade. As the population and opportunity have increased, the population of communities of color have also experienced substantial growth with an increase of 64% in the last decade.[14]

Within the City, 2.3% of residents identify as Black or African American, 13.9% as Hispanic and Non-White, 1.5% as Native Hawaiian and other Pacific Islander, 0.6% as Native American, 5.6% as Asian, 6% as Two or More Races, and 71.5% identify as White.[15]

COMMUNITY OVERVIEW

The school-aged population in Vancouver follows a similar trend, with a breakdown of 52.6% students identifying as White, 27.45% as Hispanic and Non-White, 8.9% as Two or More Races, 4.65% as Asian, 3.15% as Black or African American, 2.7% as Native Hawaiian and other Pacific Islander, and 0.45% as Native American. With the increase of diverse families from different backgrounds, 19.7% or 34,723 people spoke a language other than English at home in 2021.[16]

The City's demographic profile reflects a relatively young population with a median age of 37 years old, slightly younger than the median age of Clark County (38.6 years old).[17] Approximately 22% of the population is under 18 years old, and 47% of the population under 35 years old. There is a small aging population with 6.3% of the population 75 years or older.[18]

While approximately 10.7% of adults in the City identify as LGBTQ+[19], data from the Vancouver and Evergreen School Districts reveals that a significant percentage (31-33%)[20] of students self-report as LGBTQ+ across 8th, 10th, and 12th grade levels.

EDUCATION

There were 48,825 students in the City of Vancouver enrolled in school for the 2021-22 school year. Overall, 91% of Vancouver residents hold a high school diploma and 29.2% of Vancouver residents hold a bachelor's degree.[21]

The City of Vancouver strives to provide a conducive environment for students to thrive academically. Approximately 62% of ninth graders in Vancouver and Evergreen School Districts passed all their courses and 90% of the senior classes at Vancouver and Evergreen School districts graduated.[22]



Figure 10: Ogden Elementary School

EDUCATION

91% RESIDENTS HAVE A HIGHSCHOOL DIPLOMA

29.2% RESIDENTS HOLD A BACHELOR'S DEGREE

HOUSING

Vancouver's housing market has experienced significant changes over the past decade. The average value of a single-family home in Vancouver saw a dramatic increase of 129% between 2010 and 2020, from $213,400 to $490,494.[23]

The monthly mortgage payment averaged to $1,734[24] in March 2022 and the average market for a 1-bedroom unit in Vancouver was $1,411[25] in 2021. There is a relatively even split between renters and owners with 48% of Vancouver residents renting and 52% of Vancouver residents who own.[26]

Due to the high costs of housing, approximately 39.5% of residents are considered rent burdened, meaning more than 35% of their income is spent on rent. 21.9% of Vancouver residents are extremely rent burdened, meaning more than 50% of their income is spent on rent.[27]

Vancouver had an increase of housing units by 32% from 63,620 units in 2010 to 83,868 units in 2021.[28] However, Vancouver also suffers from a housing deficit of approximately 4,000 housing units - which is included in estimates of Clark County's deficit of

13,500 housing units. Between 2019-2021, approximately 80% of new construction in the City has been multifamily dwellings.[29]

SAFETY & MOBILITY

The 2024-2044 Transportation System Plan (TSP) outlines goals for Vancouver's transportation network organized around the principles of safety, equity, climate, choice, connectivity, and maintenance. As Vancouver grows and changes, the City is focused on expanding transportation options to include walking, rolling, biking, small mobility, transit and freight.[30]

As of 2021, 82% of Vancouver workers drove to work. Participants in the TSP outreach process cited safety and comfort as key barriers to using alternate methods of travel. While over 47,000 Vancouver residents live within a quarter mile of the Vine and the Mill Plain Bus Rapid Transit system, TSP feedback suggested that ridership might increase through improved comfort, commute time, and connectivity.[31]

During the pandemic, transit ridership declined the least in census tracts that were identified as high-priority equity areas. Additionally, BIPOC residents reported being particularly impacted by safety concerns waiting for transit on nights and weekends. The improvements outlined in the TSP prioritize areas with higher demographic indicators of risk.[32]

SAFETY & MOBILITY

29% INCREASE IN VEHICLE CRASHES (2010-2019)

47,000 RESIDENTS LIVE WITHIN 1/4 MILE OF BUS RAPID TRANSIT

82% VANCOUVER WORKERS DRIVE TO WORK



Figure 11: Farmers Market

HEALTH AND FOOD SYSTEMS

As of 2020, approximately 9.7% of Vancouver residents were living with a disability.[33] In 2018, heart disease accounted for 176 male deaths and 118 female deaths per 100,000.[34] Chronic lower respiratory diseases, which includes asthma and chronic obstructive disease, account for 210 deaths per 100,000.[35] Diabetes was another prevalent issue causing 507 deaths per 100,000.[36]

These statistics highlight the importance of addressing health issues, concerns for accessibility, and providing the necessary support systems for Vancouver residents. This includes assessing the local foodshed and identifying gaps in service to residents who may live more than a 1/4 mile from a grocery store and have limited means of transportation.

Clark County has seen an increase in the number of community-supported agricultural programs, farmers markets, and interest in locally sourced foods. Agricultural operations provide many benefits to the area including providing jobs, lowering barriers to accessing healthy foods, and enhancing the rural character and protecting open and green spaces.



Figure 12: Downtown Vancouver

CLIMATE

As Vancouver looks to mitigate its environmental impact and promote sustainability, it is crucial to meet the goals outlined in the Climate Action Framework, including how to address the largest contributors to greenhouse gas (GHG) emissions. In Vancouver, transportation (36%), buildings (28%), aviation (25%), and industrial processes (8%) are the sectors with the largest contribution to GHG emissions.[37]

Efforts to transition to renewable energy sources are underway, with roughly 9% of energy used in Vancouver and greater Clark County coming from renewable energy sources.[38] The City also aims to achieve a tree canopy of 28% by 2030 from a tree canopy of 6,066 acres, covering only 19% of Vancouver land in 2020.[39]

INCOME & EMPLOYMENT

The connection between income, employment, and diversity, equity and inclusion (DEI)

INCOME & EMPLOYMENT

$67,462 VANCOUVER MEDIAN HOUSEHOLD INCOME

15% RESIDENT HOUSEHOLDS LIVE BELOW THE FEDERAL POVERTY LINE

75% VANCOUVER WORKERS COMMUTE ALONE BY CAR

measures in Vancouver is significant, especially considering the income disparities among different racial populations.

The City's median household income stands at $67,462, but this figure varies by race: Black/African American households have a median income $24,000 lower than the overall median. Certain neighborhoods, like Bagley Downs and Meadow Homes, face alarming rates of childhood poverty, surpassing 50% for children under 5. Moreover, over 15% of resident households live below the federal poverty line.[40]

PARKS AND OPEN SPACE ACCESS

The City of Vancouver faces disparities in park access, particularly in areas north of Burton Road and and east of I-205 where there is a significant need for park acquisition to serve existing and future residents. Existing parks on the west side of I-5 tend to be smaller with a low ratio of parkland accessible to high density residential neighborhoods. These disparities were identified during the development of the Vancouver Department of Parks, Recreation and Cultural Services (VPRCS) Comprehensive Plan.[41] The Equity Index completed by VPRCS will inform recommendations in the Comprehensive Plan.

While dense tree canopies are prevalent in specific residential neighborhoods in central Vancouver, Vancouver's tree canopy coverage is significantly lower than the recommended 40% or the Washington average of 32%, with only 19% coverage. Notably, communities of color experience less tree canopy coverage, falling below the City's average by 2.4%.[42]

As climate change progresses, it will be especially important to ensure equitable access to open space and tree canopy to protect the City's most vulnerable populations from the potential impacts of global warming. The City's network of natural areas will be increasingly essential to promote resiliency. These specific concerns are addressed in the City of Vancouver's Climate Action Framework.[43]

DIVERSITY EQUITY AND INCLUSION (DEI)

Over the past few decades, Vancouver has experienced a significant increase in diversity, with a particular increase in Hispanic or Latine



Figure 13: Fourth Plain Public Art Mural

community members of any race. While the City is still 70% white, this is still a significant decrease from 1970, when 99% of the population identified as white.[44] This demographic change has brought light to various socioeconomic challenges and the need for cultural awareness and inclusivity. DEI policies and programs are vital, particularly for historically marginalized groups and individuals. Vancouver aims to promote fair and full participation regardless of race, gender, sexuality, identity, or disability which is reflected in the co-creative process for the Comprehensive Plan and Title 20 Code Update To incorporate DEI principles into the City's built environment, a long-term vision and associated policy directions will need to be developed through discussions with the community during the planning process. These policies will support the work already accomplished by the City in Reside Vancouver: An Anti-Displacement Plan which is focused on guiding equitable development in central Vancouver. Understanding current DEI concerns is crucial for developing an equity framework that addresses privilege imbalances and interconnected issues faced by different communities. (More information about the City's Equity Framework and Equity Analysis, which are considered companion documents to the Community Atlas and upcoming Comprehensive Plan and Title 20 Code Update can be found on the BeHeardVancouver.com website).

The City of Vancouver utilizes equity principles and guidelines throughout many of its adopted documents and plans to create a more inclusive City and protect marginalized community members, especially communities considered to be at risk - Black or Indigenous residents, people of color, people with low incomes, people with disabilities, renters, LGBTQ+ individuals, homeless individuals, immigrants, and small business owners. All of these communities will be prioritized in the City's efforts to ensure future Comprehensive Plan policies promote equity and inclusion for all.

EQUITY INDEX

In order to put the Community Overview into context for the City of Vancouver it is important to understand that there have been historical patterns of development that have influenced the built form across different areas of the city. Generally speaking, there are three loosely defined geographies, west (areas west of I-5), central (areas between I-5 and I-205) and east (areas east of I-205). These geographies within the city developed over time, generally west to east, and are reflective of different settlement patterns, regulations, and periods of growth.[45] A map of these geographies and their historical development can be found in the Cultural Resources chapter.



Figure 14: East Fourth Plain Boulevard

Looking at the City of Vancouver and its communities through these three distinct geographies brings light to some of the disparities being experienced currently and helps to identify areas that need additional investment and attention through the Comprehensive Plan and Title 20 Update to ensure that future policies support a more equitable approach to the growth that is anticipated for Vancouver over the horizon of the Comprehensive Plan. The Equity Index focuses on a set of metrics that include:

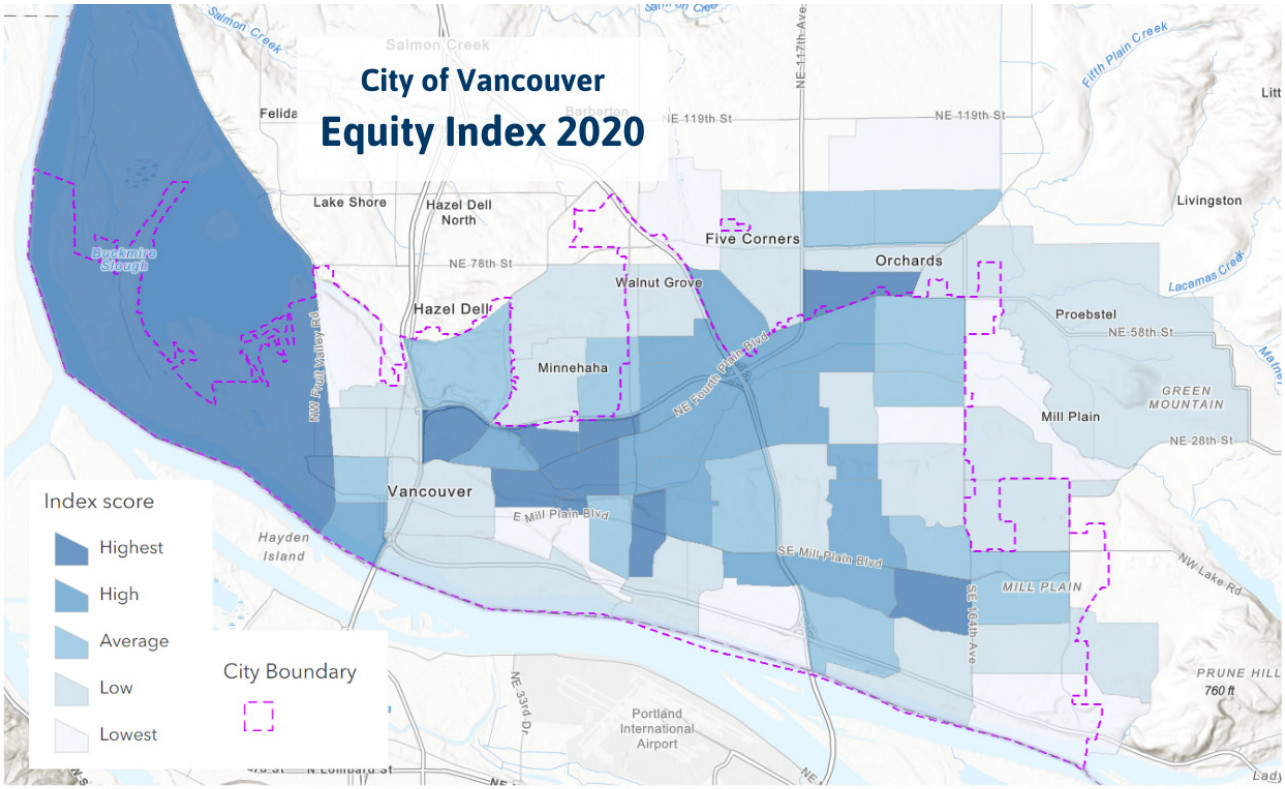
1. People of color (non-white and/ or Hispanic/Latinx)
2. People below 200% of the poverty level
3. Renters
4. Adults without a 4-year degree
5. Households with limited English proficiency
6. People with disabilities
7. Youth under age 17
8. Older adults 65 and up

These metrics were assessed by Census Tract Level, the findings of which are illustrated in Figure 16: Equity Index Map, below. A higher risk equals a high equity index. High risk areas are those that are identified for prioritized investment

SOCIAL VULNERABILITY INDEX

The Social Vulnerability Index (SVI) is a crucial tool used to assess populations most at risk during high-stakes situations like natural disasters and disease outbreaks. The Center for Disease Control (CDC) and The Agency for Toxic Substance and Disease Registry (ASTDR) utilize U.S. Census data to gauge social vulnerability on local and regional scales across the United States, identifying communities in need of assistance.[46]

To determine social vulnerability, the CDC/ATSDR employs 16 factors, such as poverty, lack of vehicle access, and crowded housing, which are categorized into four themes: Socioeconomic Status, Household Characteristics, Racial



Esri, NASA, NGA, USGS | County of Clark, WA, Oregon Metro, Oregon State Parks, State of Oregon GEO, WA State Parks GIS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

Figure 15: Equity Index Map

and Ethnic Minority Status, and Housing Type/Vehicular Transportation Access.[47]

Understanding SVI is critical for emergency planners, city officials, public health authorities, state and local health departments, and non-profit organizations. Together, they analyze municipalities at risk and provide support to the most vulnerable populations in the event of a disaster. This involves estimating the required supplies like food, water, medicine, and bedding, as well as the number of emergency personnel and shelters needed to assist people effectively.[48]

According to the CDC/ATSDR census tracts, the City of Vancouver exhibits a high social vulnerability index. Areas with medium-high and high social vulnerability are concentrated along major interstates and arterial roads. The greater Vancouver areas, on the other hand, display a lower level of vulnerability, ranging from low to low-medium vulnerability.

The SVI map is intended to reflect existing conditions and does not indicate priority areas for investment. However, it can be used as a tool to identify areas that are especially susceptible to the impacts of public investment when considered alongside other factors like residential density and housing costs. Public investment and private development can bring numerous benefits, but if equity considerations are not prioritized, it can lead to severe consequences for vulnerable communities, including pressures on the housing market and involuntary displacement.

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43 City of Vancouver Climate Action Framework
44 City of Vancouver Equity Analysis 2023
45 City of Vancouver Equity Analysis 2023
46 Center for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry Social Vulnerability Index, 2022
47 Center for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry Social Vulnerability Index, 2022
48 Center for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry Social Vulnerability Index, 2022

SOCIAL VULNERABILITY MAP

The purpose of this map is to illustrate social vulnerability based upon information available from the CDC. The CDC assesses 16 factors, such as poverty, lack of vehicle access, and crowded housing, which are categorized into four themes: Socioeconomic Status, Household Characteristics, Racial and Ethnic Minority Status, and Housing Type/Vehicular Transportation Access.

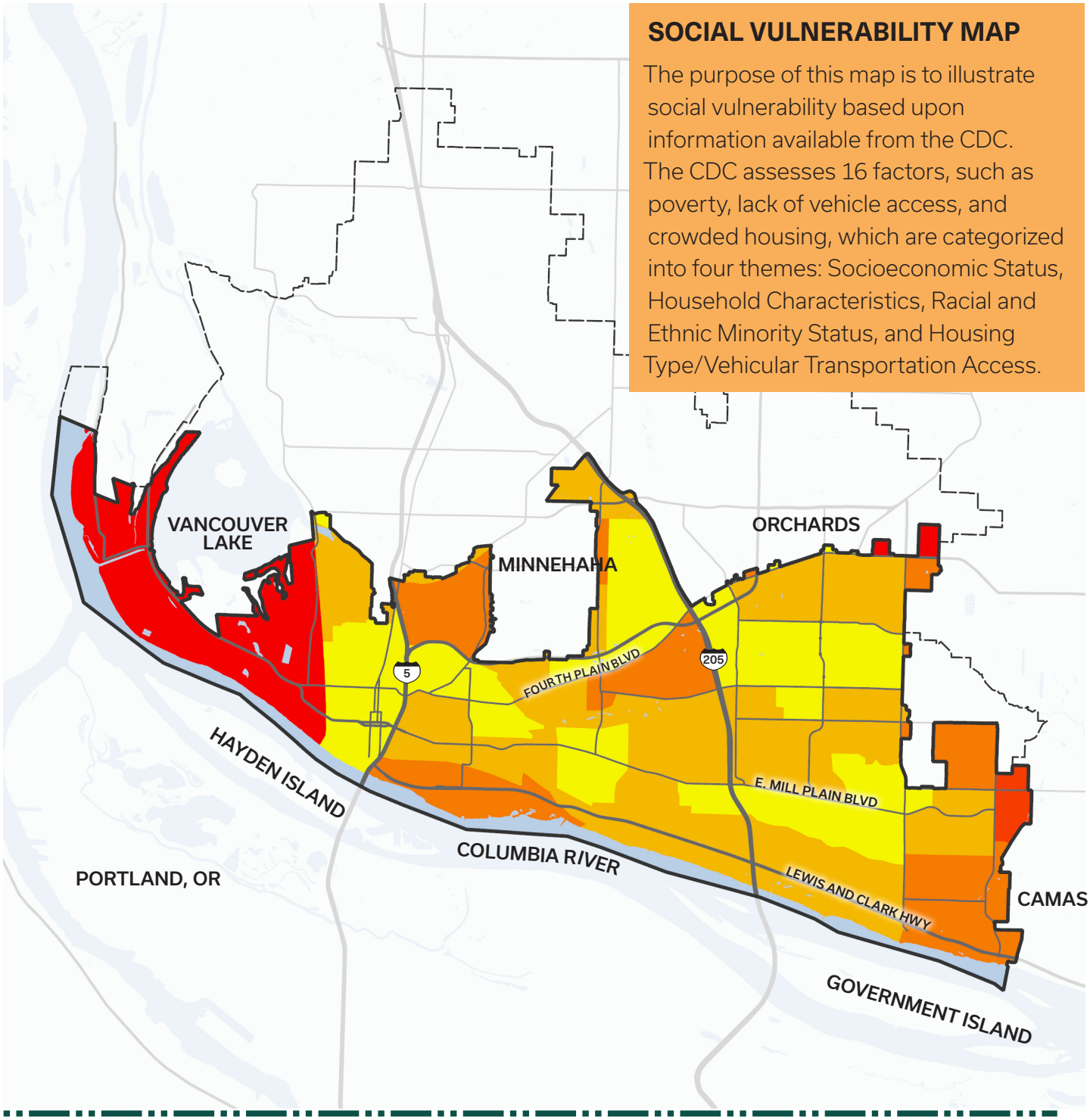


Figure 16: Social Vulnerability Index

City Boundary
UGA
Waterbodies

Social Vulnerability
Highest
Lowest

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

NATURAL ENVIRONMENT

NATURAL ENVIRONMENT OVERVIEW

Vancouver is rich in natural beauty, with rivers, creeks and lakes, urban forests and views of Mt. St. Helens, Mt. Adams, and Mt. Hood. Its landscape offers innumerable benefits, ecological and otherwise.

The Columbia River, Burnt Bridge Creek, Vancouver Lake and other water resources provide fish and wildlife habitat, and opportunities for recreation.[49] Oak woodland and Douglas fir forest support sensitive native species, improve air and water quality and beautify the urban landscape.[50]

For thousands of years, humans have relied on Vancouver's abundant water, wildlife and forest. Ongoing urban development poses a threat to key natural resources and requires thoughtful and intentional management. In recent years, wildfires have become more prevalent during summer and early fall, which has caused damage to forested areas, and contributed to intermittent unhealthy air quality conditions due to smoke and particulate matter. Vancouver is also vulnerable to flooding, landslides and earthquakes.[51]

EXISTING CONDITIONS

- Vancouver is 70 miles east of the Pacific Ocean and is bordered on the south and west by the Columbia River. The Lewis River is to the north and the Cascade Mountains lie to the east.
- Vancouver's climate is typical to the Pacific Northwest, which is characterized by wet, mild winters and hot, dry summers. The City receives approximately 42 inches of rainfall annually.[52]
- The City of Vancouver and the surrounding region have been shaped by a network of inland streams and wetlands that support a wide variety of vegetation and wildlife habitat, ranging from pasture and agricultural lands, riparian vegetation and woodlands. Historically, Vancouver's landscape was characterized by open meadows, conifer forests, mixed conifer-deciduous forests, and lowland riparian forests.[53]
- The alluvial floodplain contains mostly marshes and hardwoods, while the upland includes various substantial woodlands of 20 to 30 acres or more.[54]
- Critical Areas, which include 'wetlands, frequently flooded areas, fish and wildlife habitat and conservation areas, geologically hazardous areas, and areas with a critical recharging effect on aquifers used for potable water' are protected by the State of Washington Growth Management Act. In Vancouver, protections apply to areas including riparian buffers and special flood hazard zones.[55]
- Air quality is monitored in Clark County by the Southwest Clean Air Agency, which was created in response to the Washington Clean Air Act of 1967. The air quality in Clark County was good to moderate all but five days in 2022.[56]
- The City of Vancouver has multiple Superfund and Brownfield sites which includes the Alcoa, or Vancouver Smelter site, which is a property adjacent to the Columbia River. The City is actively working to inventory and assess brownfield sites within City limits which are targeted for clean-up through a partnership with the Clark County Public Health Department. Using a $600,000 Brownfields Coalition grant from the U.S. Environmental Protection Agency, the Brownfields Assessment Project will focus on the Fourth Plain area in central Vancouver and may include St. John's and/or St. James and Fruit Valley Areas.[57]

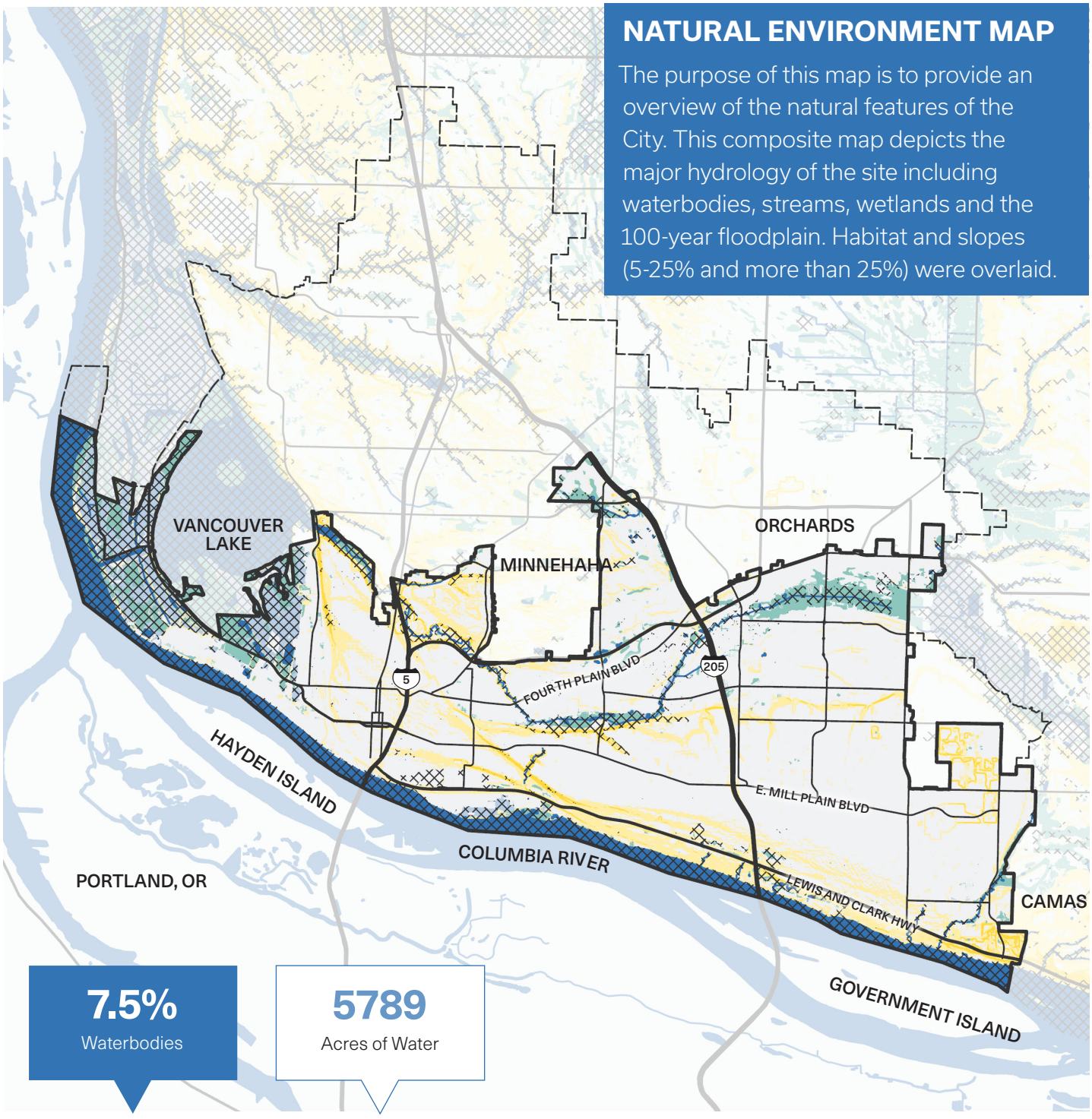


Figure 17: Natural Environment Map

City Boundary
UGA
Waterbodies
Stream

Wetland
100 Year Floodplain
Habitat

Slope
5 to 25%
25% or More

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

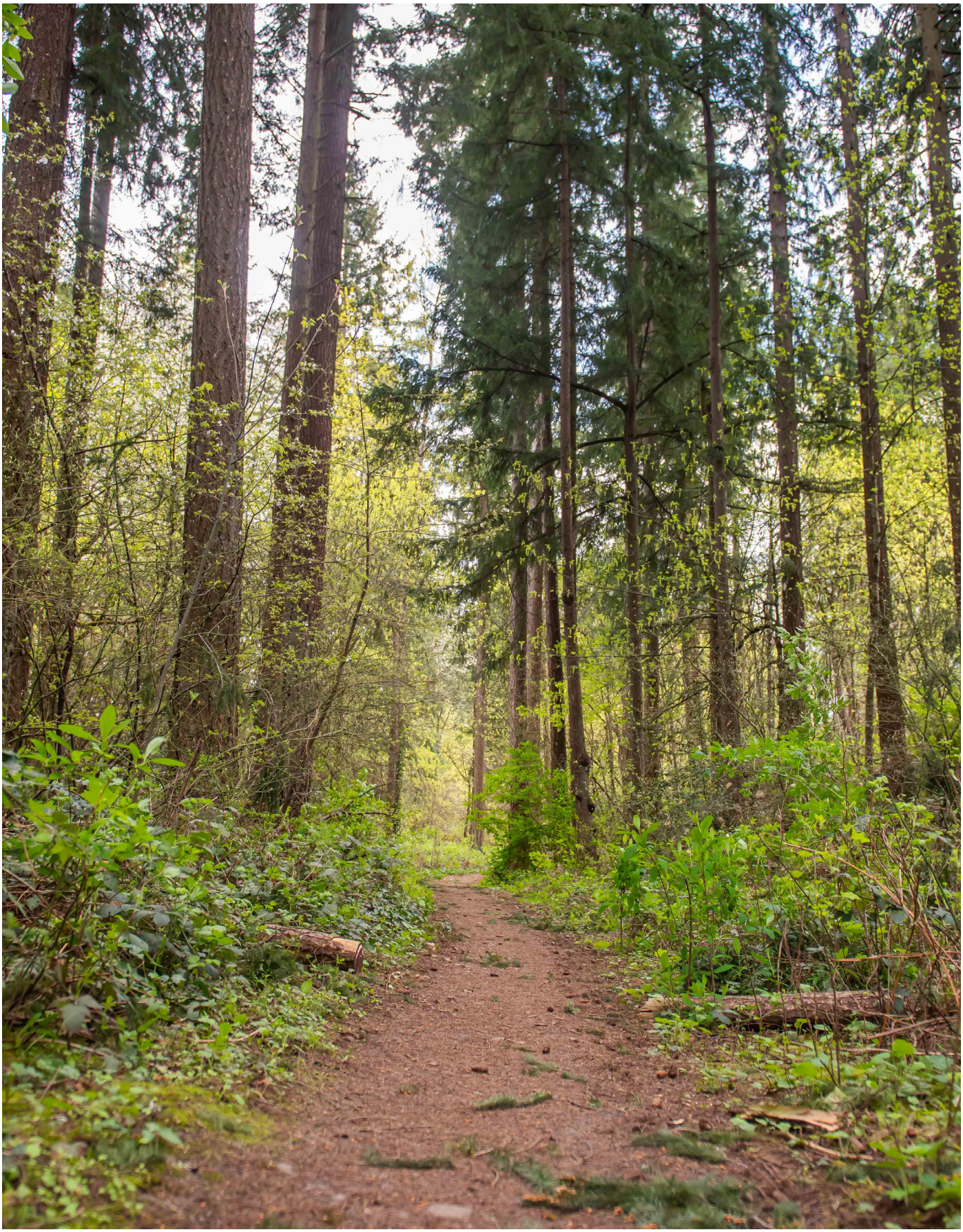


Figure 18: Tranquility Urban Natural Area

ENVIRONMENTALLY SENSITIVE AREAS

The Growth Management Act requires that critical environmental areas are protected. Critical areas include wetlands, areas with a critical recharging effect on aquifers, fish and wildlife habitat, floodplains and geologically hazardous areas.

In addition to compliance with the Growth Management Act, Vancouver's municipal code includes a Critical Areas Protection Ordinance. The ordinance designates and protects ecologically sensitive and critical areas in Vancouver and describes reasonable use of those properties.[58]

Vancouver Lake is a vital regional resource that fulfils a variety of functions including wildlife habitat, flood control, wetlands, surface and groundwater hydrology and recreational amenities. However, the lake suffers from blue-green algae blooms that are toxic to humans and wildlife.[59]

The Clark County Conservation Areas Acquisition Plan, adopted in 2014, divides the County into watershed subareas to identify high value conservation lands. Within the City of Vancouver, the Plan identifies land in and around the Columbia South Slope, Vancouver Lake Lowlands and the Burnt Bridge Creek corridor.[60]

The Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, adopted in 2022, recommends additional conservation lands along major riparian corridors, habitat areas and migration corridors, urban growth buffers, and areas with unique site qualities.[61]

ENVIRONMENTAL PROTECTION FRAMEWORK

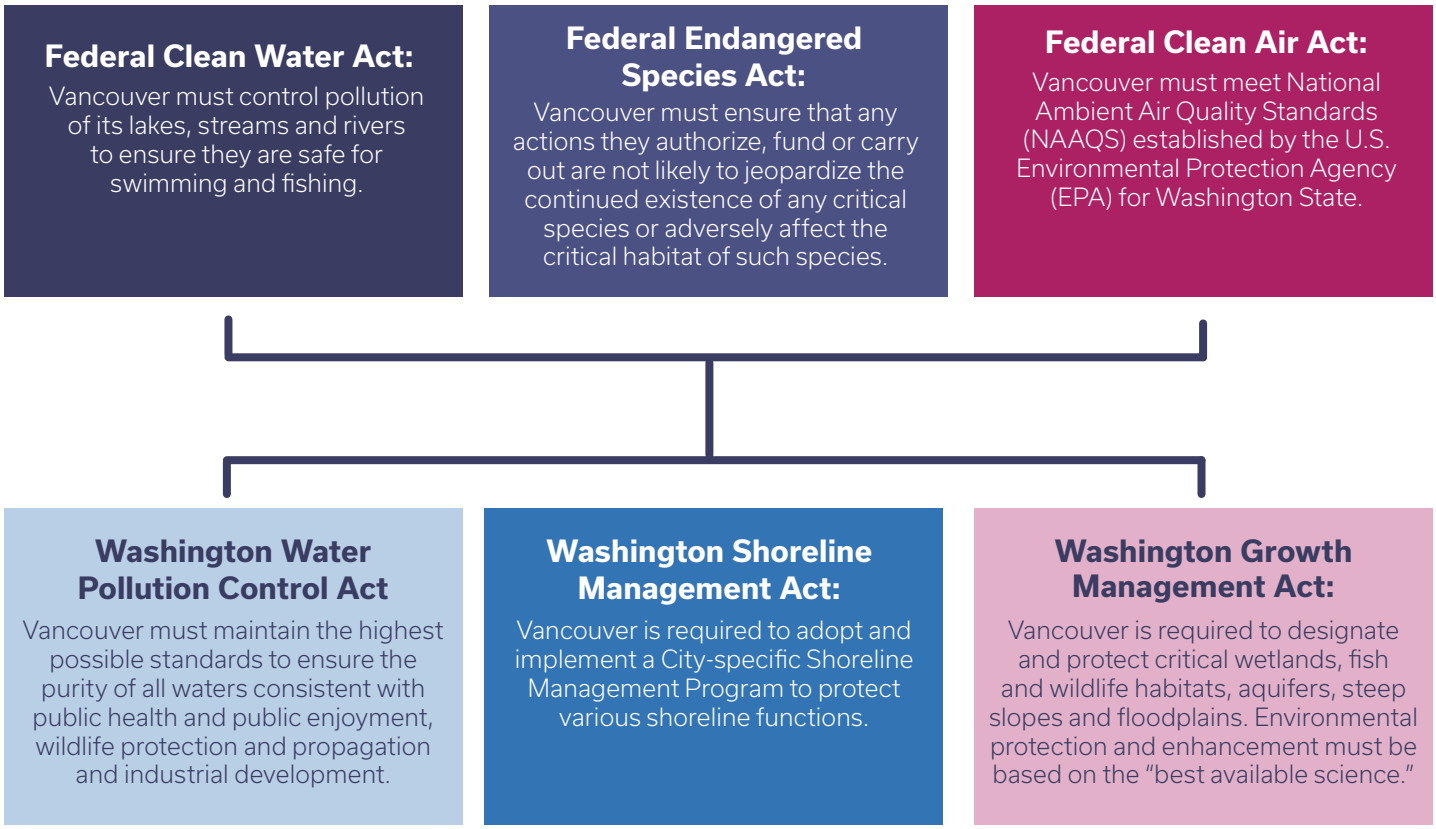


Figure 19: Environmental Protection Framework

SUPERFUND + BROWNFIELD MAP

The purpose of this map is to highlight sites in the city that have actual or perceived contamination. This map depicts superfund and brownfield sites identified by the EPA (Environmental Protection Agency). There are four superfund sites throughout the City.

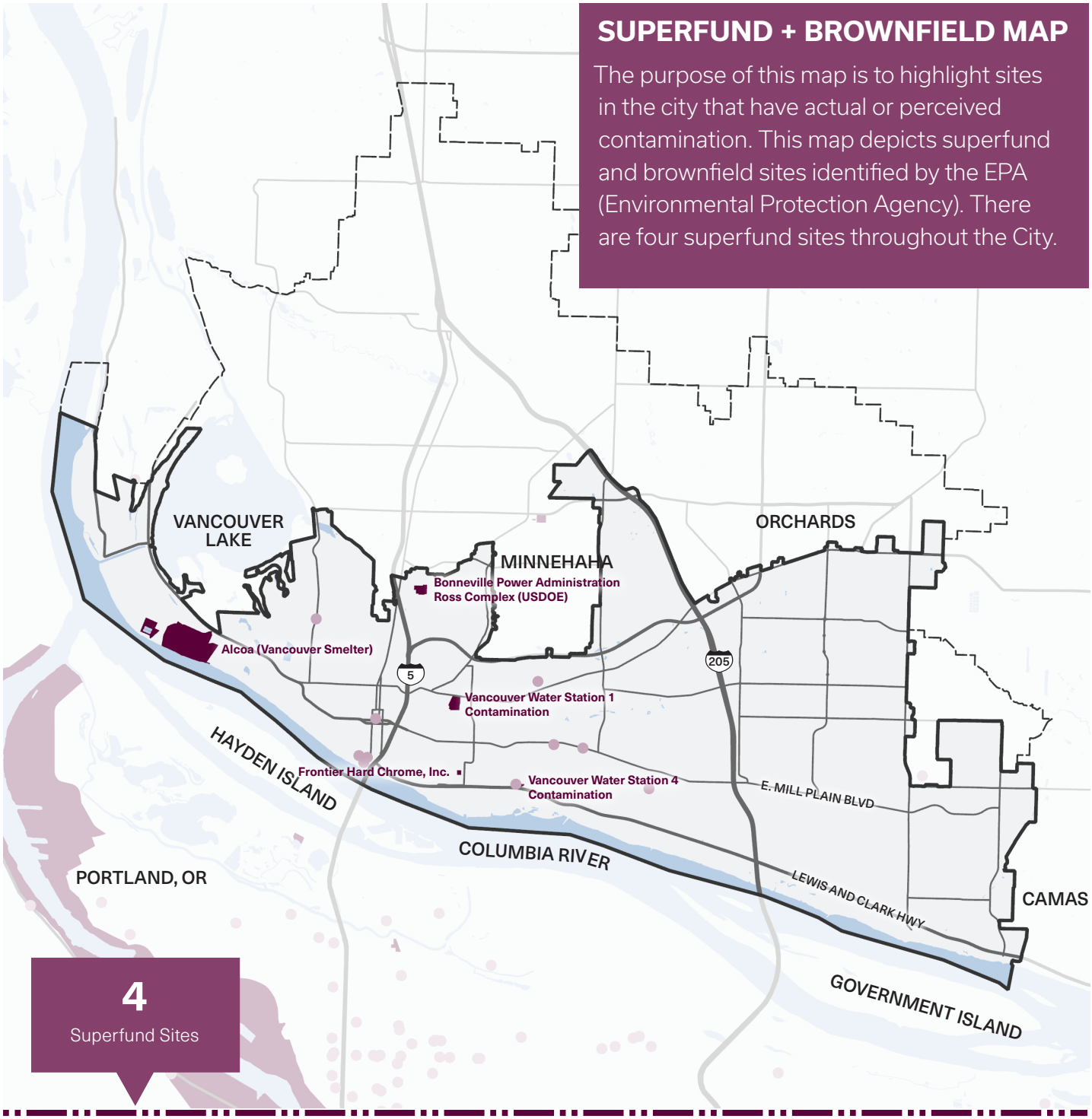


Figure 20: Superfund and Brownfields Map

City Boundary
UGA
Waterbodies
Superfund Site
Brownfield Site

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

SUPERFUND + BROWNFIELD SITES

Superfund sites are set aside by the United States Environmental Protection Agency (EPA) as environmentally contaminated sites designated for clean up. Brownfield sites are sites whose redevelopment may be complicated by the presence of an environmental contaminant.[62]

There are several Superfund and brownfield sites throughout Vancouver, including the 300-acre Alcoa (Vancouver Smelter) site on the southwest side near the Columbia River. The Alcoa site was purchased by Port of Vancouver in 2009 and now hosts Terminal 5, a marine terminal for long-term storage and rail loading.[63]

The City of Vancouver is currently conducting a Brownfield Assessment Project which is a partnership with Clark County Public Health and the Vancouver Housing Authority. This project is utilizing a $600,000 Brownfields Coalition Grant from the U.S. Environmental Protection Agency. The Brownfield Assessment Project is focused primarily on assessments in the Fourth Plain area.[64]

The City has updated and expanded its inventory of Brownfields sites to include potential sites throughout Clark County and will work to complete at least 15 Phase I Environmental Site Assessments, complete at least 12 Phase II ESAs, prepare analyses - Analysis of Brownfield Cleanup Alternatives (ABCA) - for one hazardous substance site and one petroleum site. Additional clean up plans will be developed for up to two brownfield sites through Area-Wide Plans (AWP) or Final Clean Up Plans.[65]

The City has brought together a Brownfields Advisory Committee (BAC) which will provide guidance throughout the duration of the grant. Cataloguing ownership of these sites may be important for understanding what sites may be rehabilitated for parklands, housing, or other future development.[66]

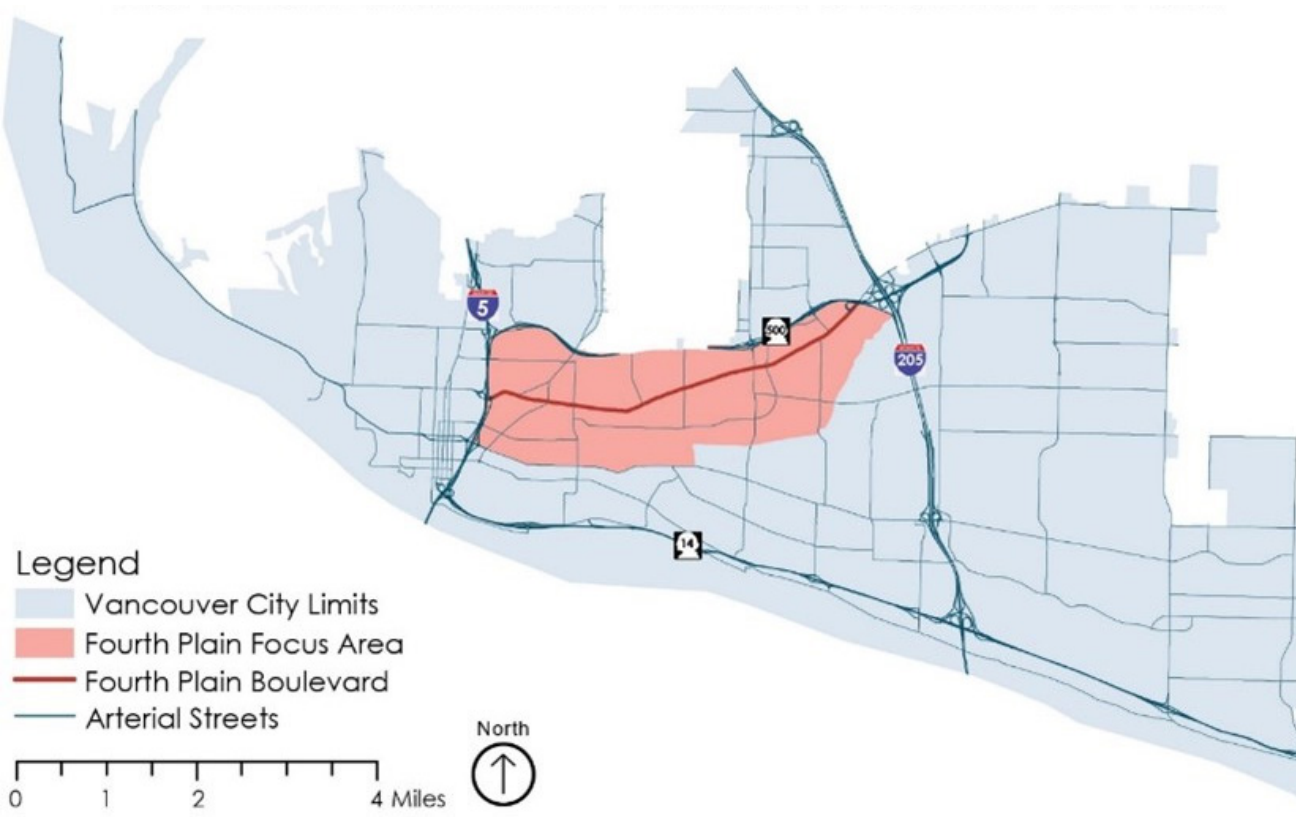


Figure 21: Brownfields Project Fourth Plain Focus Area Map

WATER RESOURCES

Water is abundant in Vancouver – the City contains approximately 2,467 acres of wetland and 2,524 acres of water, which includes rivers, streams and lakes. All Vancouver drinking water comes from local groundwater.[67]

Vancouver's three main waterbodies (Columbia River, Burnt Bridge Creek, and Vancouver Lake) are all considered impaired by pollutants by the State of Washington Department of Ecology.[68]

Vancouver's floodplain is concentrated at the western edge of the city. Stormwater retention sites are distributed throughout the city.[69]

The Columbia River provides recreation opportunities, helps nurture wildlife, forests, agriculture, neighborhoods and businesses.[70]

The Burnt Bridge Creek Greenway links several green spaces across Vancouver through eight miles of paved trail alongside the Burnt Bridge Creek that pass through a variety of landscapes. Parts of the creek support fish species.[71]

Vancouver Lake serves as a haven for wildlife and migratory waterfowl. Visitors to the park can also enjoy views of Mount Hood, Mount St. Helens and Mount Adams on clear days.[72]



Figure 22: Columbia River



Figure 23: Vancouver Lake



Figure 24: Columbia River (East)

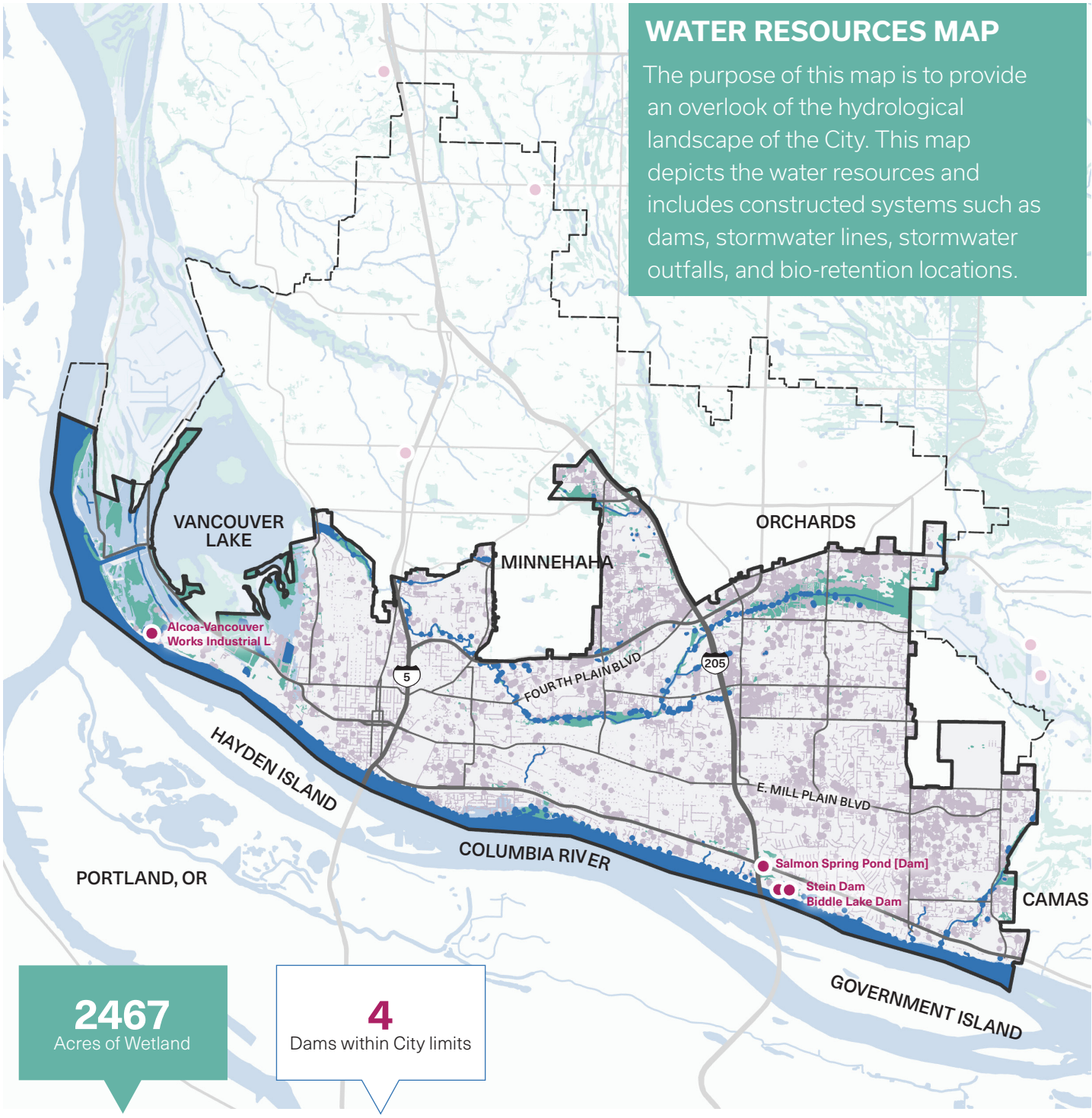


Figure 25: Water Resource Map

City Boundary
UGA
Waterbodies
Stream
Wetland
100 Year Floodplain
Dam

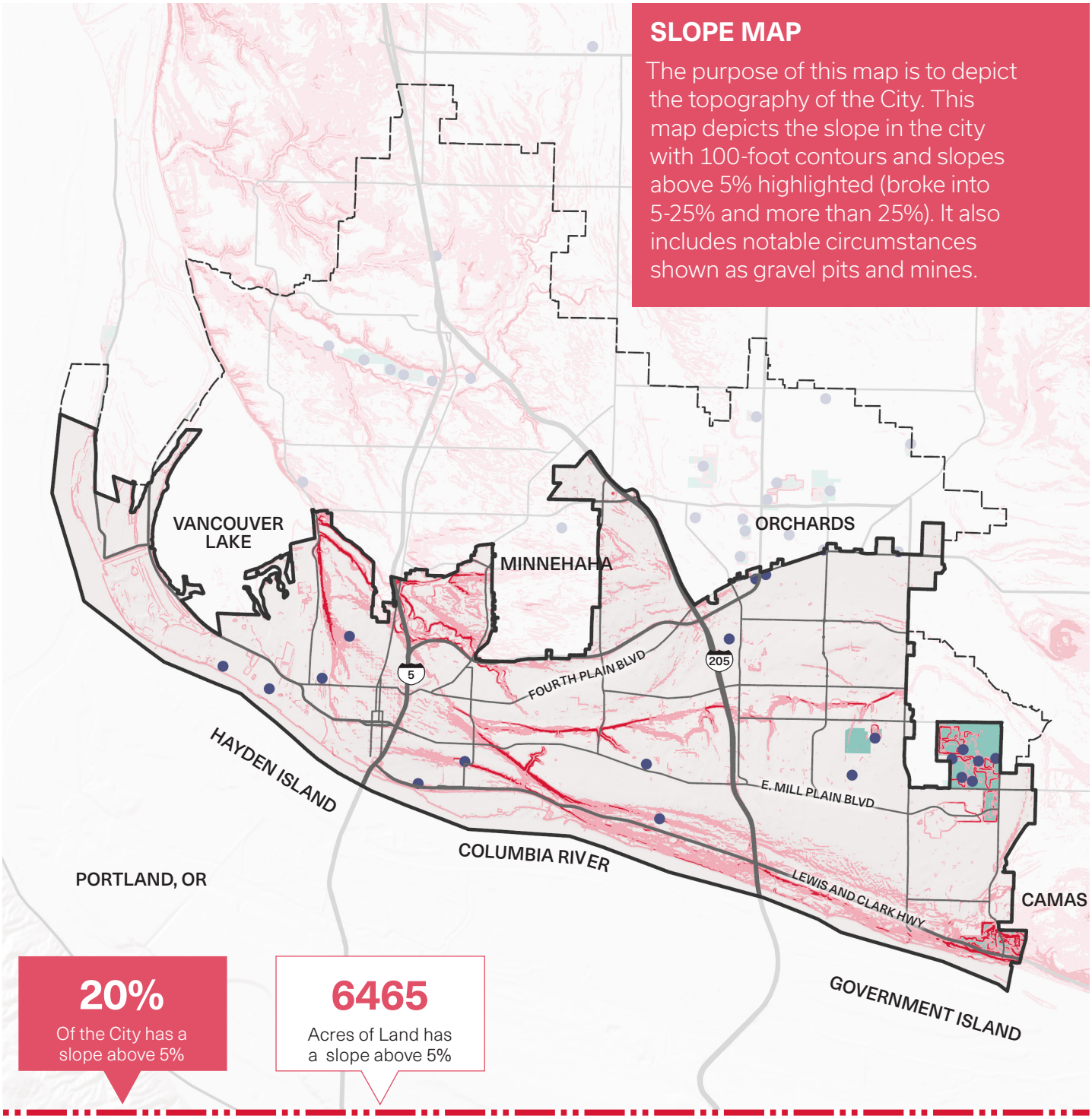
Stormwater
Main Line
Outfall
Bio-retention, Swale, Pond, etc.

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

SLOPE MAP

The purpose of this map is to depict the topography of the City. This map depicts the slope in the city with 100-foot contours and slopes above 5% highlighted (broke into 5-25% and more than 25%). It also includes notable circumstances shown as gravel pits and mines.



20%
Of the City has a slope above 5%

6465
Acres of Land has a slope above 5%

Figure 26: Slope Map

City Boundary
UGA
Waterbodies
Gravel Pit
Mine

Slope
Less than 5%
5 to 25%
25% or More

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

TOPOGRAPHY

Ancient glacial flooding has molded Vancouver's landscape by depositing clay, silt, sand and gravel along the banks of the Columbia River.[73]

The City is relatively flat, but there are steep slopes along portions of the Columbia River, Burnt Bridge Creek and Vancouver Lake.

Approximately 20% of the City has a slope above 5%. Slopes of around 5% to 25% are highly prevalent on the southeast side of Vancouver touching Columbia River. Slopes of 25% or more are prevalent closer to the center of the city with around a two-mile radius.

It is important to understand where slopes are steep, as these sites may be more difficult to develop due to possible instability, erosion or drainage problems.[74]

Gravel pits are located sporadically throughout the City but are highly prevalent on the east side of Vancouver alongside high slopes (above 25%) and mines.



Figure 27: Old Evergreen Highway Aerial

TREE CANOPY

Vancouver's 6,000 acres of tree canopy is composed primarily of Douglas fir, red cedar, hemlock, maple, and alder.[75]

Vancouver has continuously been recognized as a Tree City USA by the National Arbor Day Foundation, in partnership with the U.S. Forest Service and Washington State Department of Natural Resources Urban and Community Forestry Program. This recognition reflects Vancouver's commitment to effective management and care for its urban tree canopy.[76]

The 2011 Comprehensive Plan established a goal of 28% tree canopy cover by the year 2030.[77] As of October 2023, Vancouver reported 19% tree canopy cover (no change from 2010).[78]

Tree canopy ranges from 40% in the Dubois Park neighborhood to 9% in the Esther Short neighborhood.[79] The densest tree canopy is concentrated in the southeast near the banks of the Columbia River. There are significant gaps in tree canopy moving west along the river.

Tree canopy is more prevalent from the center to the east of Vancouver. Dense tree canopy is concentrated along Lewis and Clark Highway and Burnt Bridge Creek. Tree canopy is more sparse in residential and industrialized neighborhoods.

The Urban Forestry Management Plan, published in October 2023, outlines a long-term framework to preserve Vancouver's urban forest, achieve tree canopy coverage goals and address environmental injustice.[80]

EQUITY ANALYSIS FINDING

Neighborhoods with higher proportions of people of color have 2.4% less tree canopy cover than the City average.

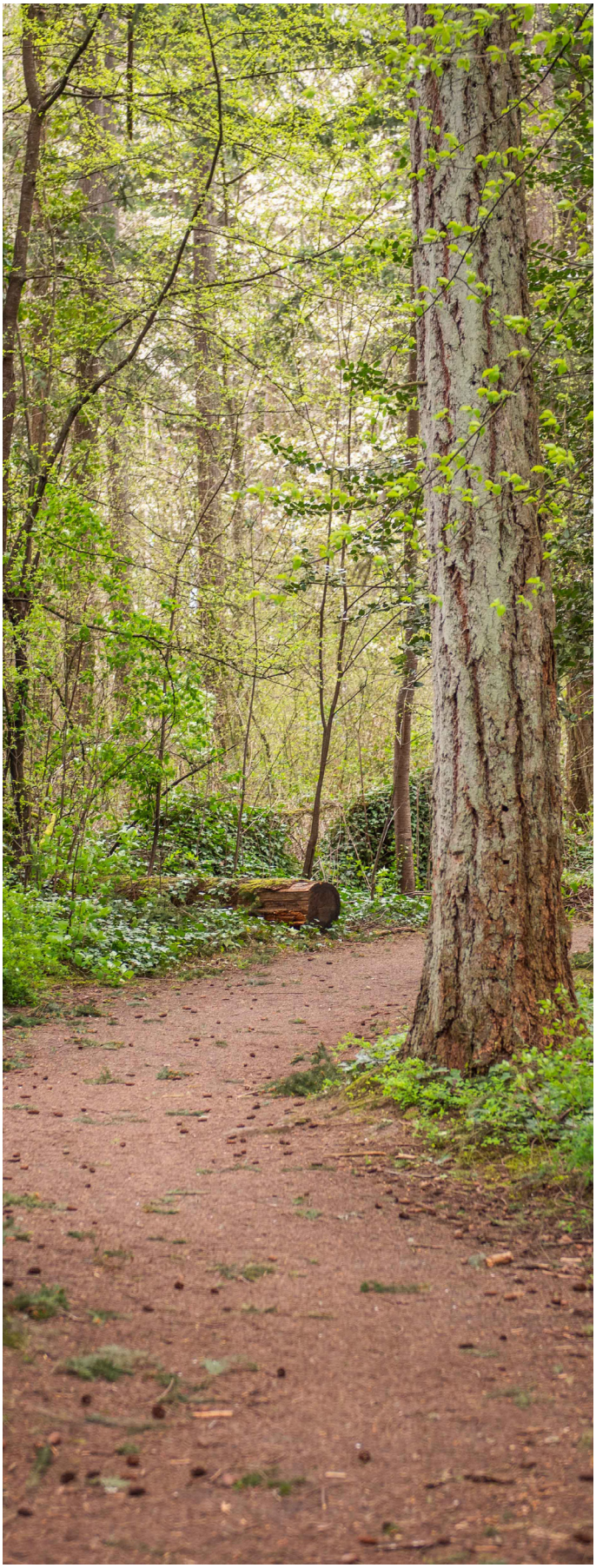


Figure 28: Beaver Marsh Loop

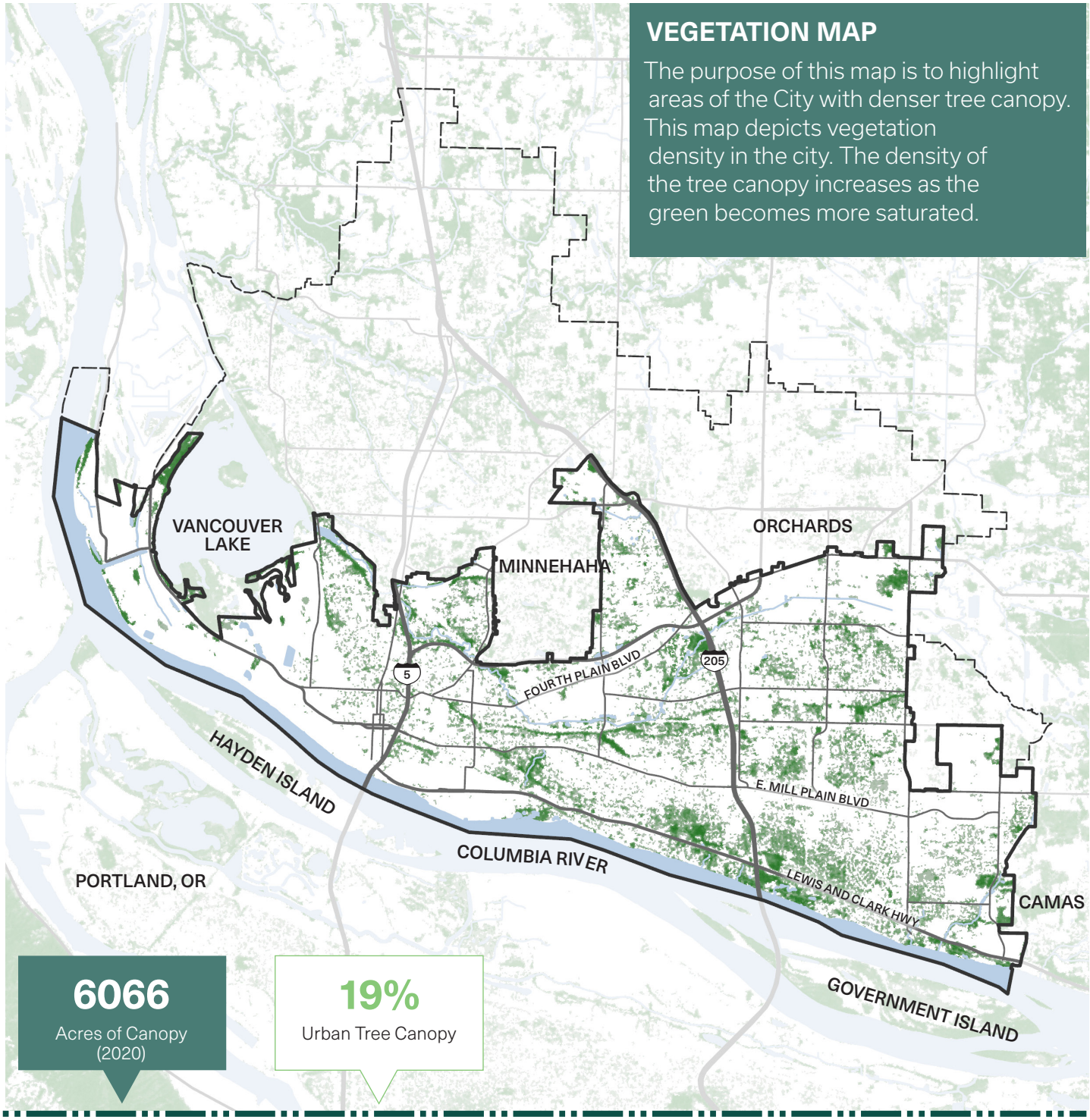


Figure 29: Vegetation Map

City Boundary
UGA
Waterbodies

Tree Canopy
Dense
Sparse

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

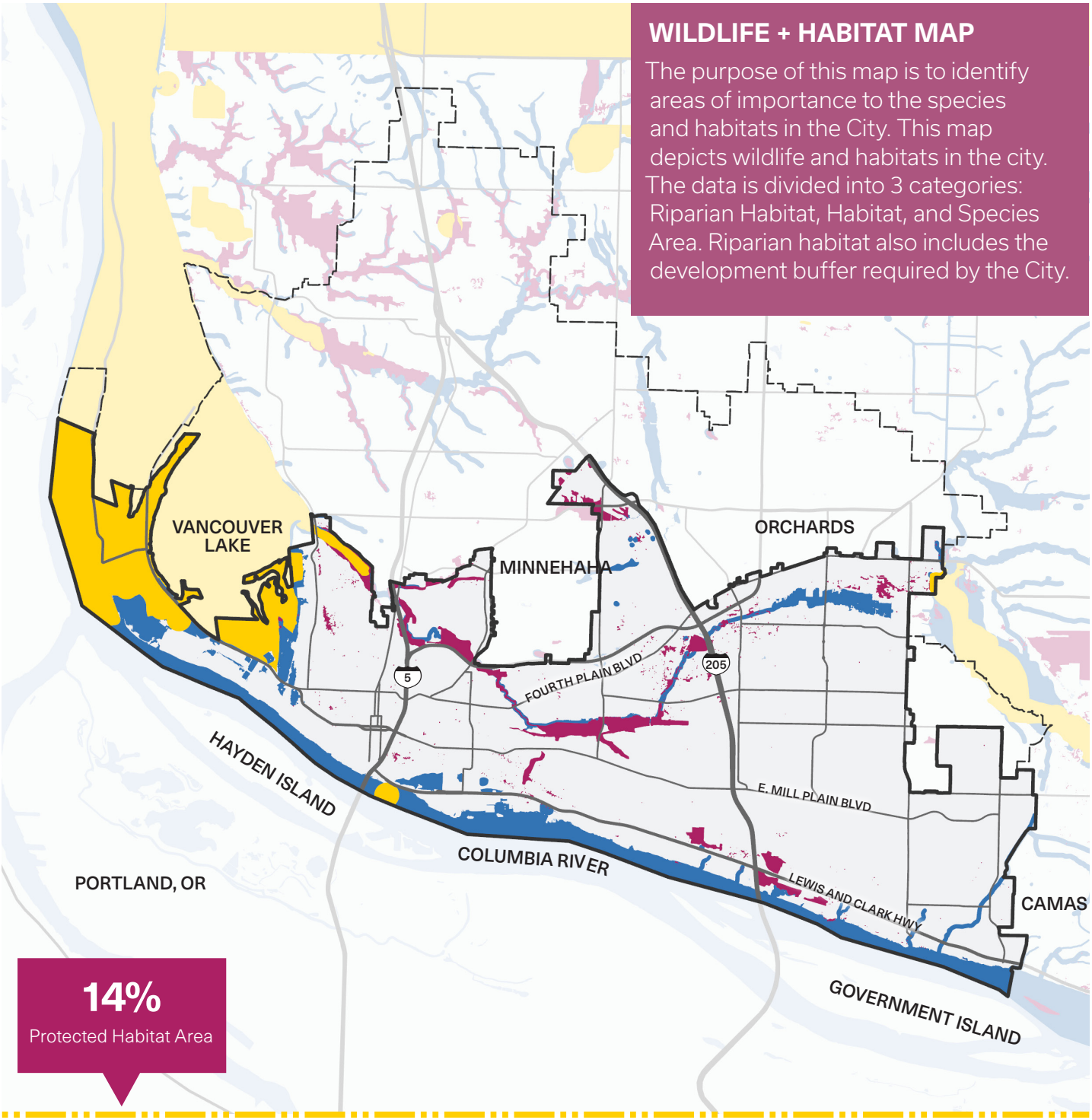


Figure 30: Wildlife and Habitat Map

City Boundary
UGA
Riparian Habitat
Habitat Area
Species Area

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

WILDLIFE + HABITATS

Approximately 14% of Vancouver is considered Riparian Habitat, Habitat Area or Species Area based upon existing County, State and Federal data. Habitat Areas are located primarily in the center of the City along Burnt Bridge Creek as well as on the far East of Vancouver next to Camas, Washington. Most of the Species Areas are located along the west side of Vancouver. The Riparian Habitat is located along Burnt Bridge Creek and Columbia River. Additionally, Vancouver is an important stop for birds traveling along the Pacific Flyway and fish traveling along the larger Lower Columbia region fish migration route.[81]

The Washington Department of Fish and Wildlife (WDFW) identifies priority habitats and species to ensure protection and management. Priority habitats include riparian areas, freshwater wetlands and oak woodlands, while priority species include bald eagles, western grey squirrels and great blue herons.[82]



Figure 31: Fenton Park



Figure 32: Burnt Bridge Creek Regional Trail

ONGOING CHALLENGES

Restoring and protecting Vancouver's natural areas requires ongoing maintenance, including hand work in shrub and native plant areas, removal of health and safety hazards, and the upkeep of natural areas impacted by human use.[83]

Air quality is an ongoing challenge for Vancouver, especially given the increasingly frequent wildfires. Despite its good to moderate air quality day-to-day, in 2023, Clark County received an "F" grade from the American Lung Association's State of the Air Report, which tracks ozone, particle pollution and populations at risk.[84]

Tree health management, species selection, and best practices in design and maintenance are essential to achieve Vancouver's tree canopy goals. The tree canopy goals established in the Urban Forestry Management Plan were developed to address discrepancies in tree cover between neighborhoods, particularly the 2.4% difference in tree canopy cover in neighborhoods with higher proportions of people of color.[85]

The Burnt Bridge Creek, Vancouver Lake, and the Columbia River are all considered impaired.[86] Vancouver must balance the recreation and economic functions of its waters while preserving their ecological function by enhancing water quality, improving drainage, protecting wetlands and other sensitive areas and preparing for flooding.

While Vancouver will not be uniquely affected by climate change, this is a major challenge the City must respond to in the coming years and which has been highlighted as a priority through the City of Vancouver Strategic Plan: 2023-2029 Update. In recent years the city has experienced heat waves, hazardous ice storms, and wilfire smoke - and has resolved to drastically cut greenhouse gases in order to achieve its adopted goal of carbon neutrality by 2040.[87]

CHAPTER SOURCES

49 Vancouver Comprehensive Plan, 2011-2030
50Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022-2030
51 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022-2030
52 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022-2030
53 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022-2030
54 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022-2030
55 Vancouver Comprehensive Plan, 2011-2030
56 Southwest Clean Air Agency
57 United States Environmental Protection Agency, Superfund Redevelopment Program
58 Municipal Research and Services Center of Washington
59 Clark County Public Health
60 Clark County Conservation Areas Acquisition Plan
61 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022-2030
62 United States Environmental Protection Agency, Superfund Redevelopment Program
63 United States Environmental Protection Agency, Superfund Redevelopment Program
64 City of Vancouver Brownfields Assessment Project
65 City of Vancouver Brownfields Assessment Project
66 City of Vancouver Brownfields Assessment Project
67 City of Vancouver
68 State of Washington Department of Ecology
69 City of Vancouver Stormwater Management Plan 2023
70 Vancouver Comprehensive Plan, 2011-2030
71 Clark County Stream Health Report
72 Friends of Vancouver Lake
73 Vancouver Comprehensive Plan, 2011-2030
74 Southern Tier Central Regional Planning and Development Board
75 Vancouver Comprehensive Plan, 2011-2030
76 Vancouver's Downtown Association
77 Vancouver Comprehensive Plan, 2011-2030
78 City of Vancouver Urban Forestry Management Plan
79 City of Vancouver Equity Analysis 2023
80 City of Vancouver Urban Forestry Management Plan
81 Washington Department of Fish and Wildlife
82 Washington Department of Fish and Wildlife
83 Vancouver Comprehensive Plan, 2011-2030
84 American Lung Association
85 City of Vancouver Urban Forestry Management Plan
86 State of Washington Department of Ecology
87 City of Vancouver Strategic Plan: 2023-2029 Update

HISTORY AND CULTURAL RESOURCES

HISTORY OVERVIEW

The City of Vancouver, situated on the north bank of the Columbia River, possesses a rich historic legacy that dates back thousands of years. At the time of European colonization, Vancouver was primarily occupied by the Chinook and Cowlitz tribes. Countless tribes from across the Pacific Northwest came to this area to trade with one another via the extensive network of waterways. Historically, the city was known for its prime location along the Columbia River, allowing access to abundant resources, trade, and shared goods.[88]

European settlement in Vancouver commenced in the late 18th century, when Captain George Vancouver of the British Royal Navy ventured into the area. In the early 19th century, the Lewis and Clark Expedition set foot on the site of Vancouver when exploring the west coast of North America, but it was not until 1825 that Fort Vancouver was established as a major trading post for the Hudson's Bay Company. This was a significant moment in history as this promoted the fur trading business and the economic development in the region.[89]

Around the mid-19th century, there were many settlers, primarily attracted by the Oregon Trail and promise of fertile lands. Vancouver was a major transportation hub enabling agricultural products to reach broader markets along the West Coast. This period of rapid growth led to the congressional approval of the formation of Vancouver as an official City in 1857.[90]

Throughout the 20th century, Vancouver experienced significant industrialization, urban development, and population growth. During this time it established numerous industries such as shipbuilding, lumber, and manufacturing.[91]

Many historic sites and buildings have been revitalized to preserve their unique architectural characteristics and embrace Vancouver's history. The City of Vancouver is popularly recognized for its historic site, Fort Vancouver. Fort Vancouver has a rich, long history from its establishment as a major trading post in the 19th century to its role as an Army post during the Second World War. Fort Vancouver and other historic sites are preserved to educate residents on Vancouver's history and how the city developed into what it is now.[92]



Figure 33: Grant House Vancouver Barracks

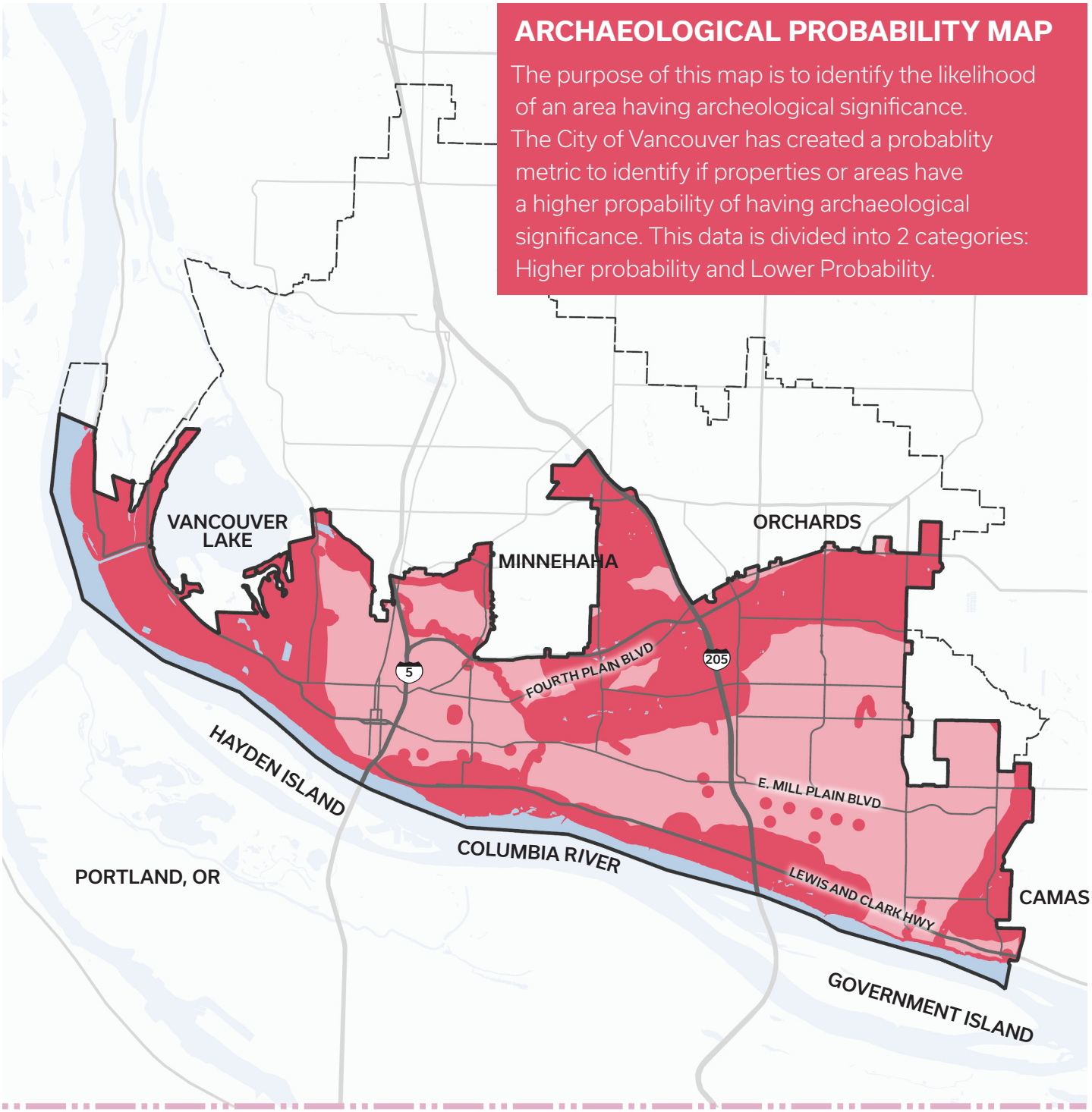


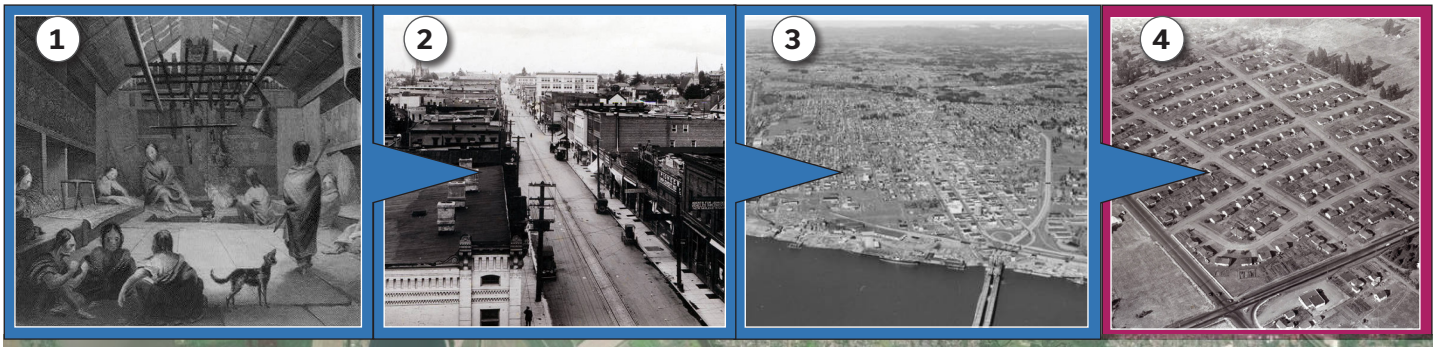
Figure 34: Archeological Probability Map

City Boundary
UGA
Waterbodies

Probability
Higher
Lower

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA



10,000 years ago - 1825 The first people establish communities in the area that is now Vancouver and Clark County, including Chinook and Cowlitz tribe settlements.

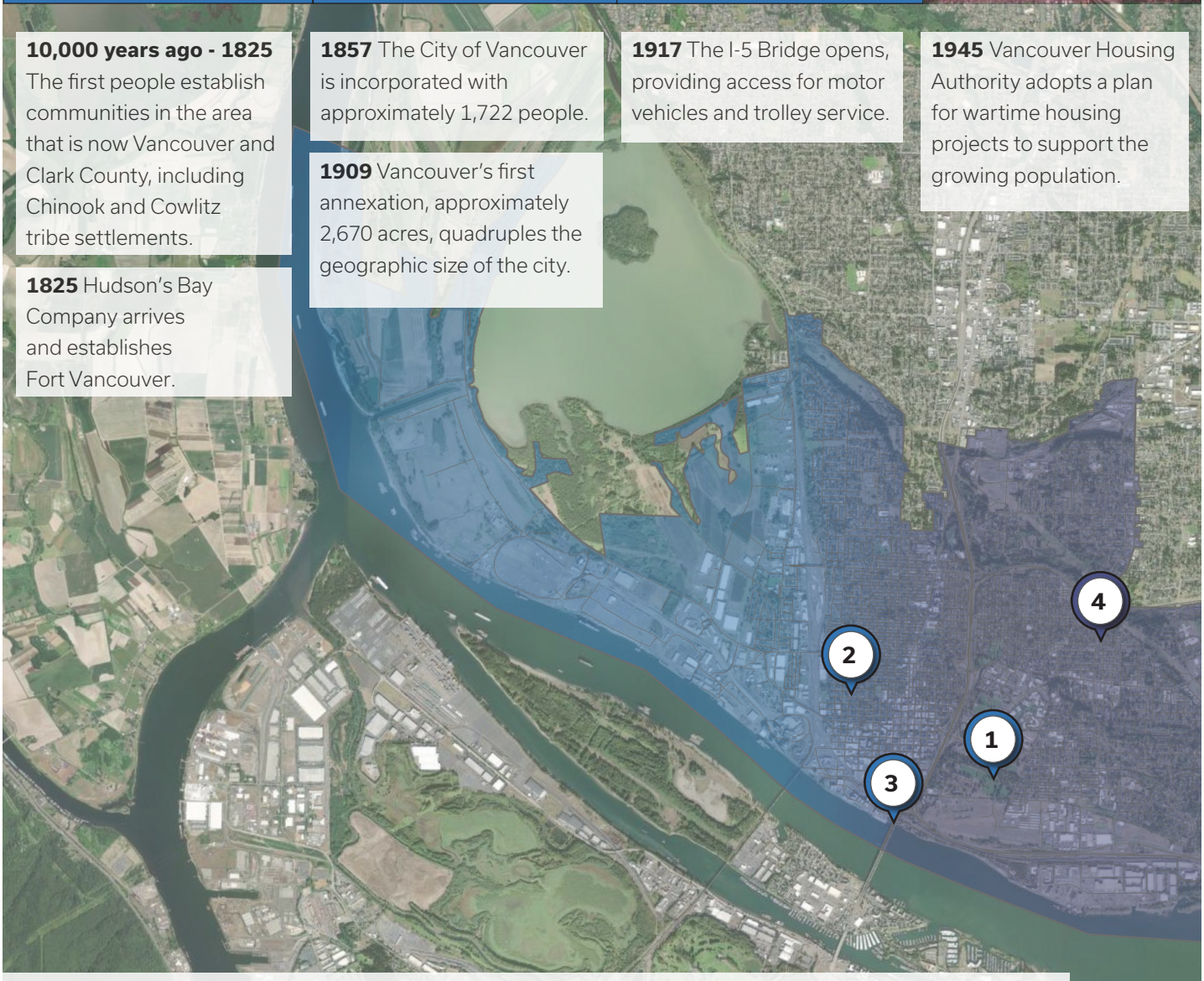
1825 Hudson's Bay Company arrives and establishes Fort Vancouver.

1857 The City of Vancouver is incorporated with approximately 1,722 people.

1909 Vancouver's first annexation, approximately 2,670 acres, quadruples the geographic size of the city.

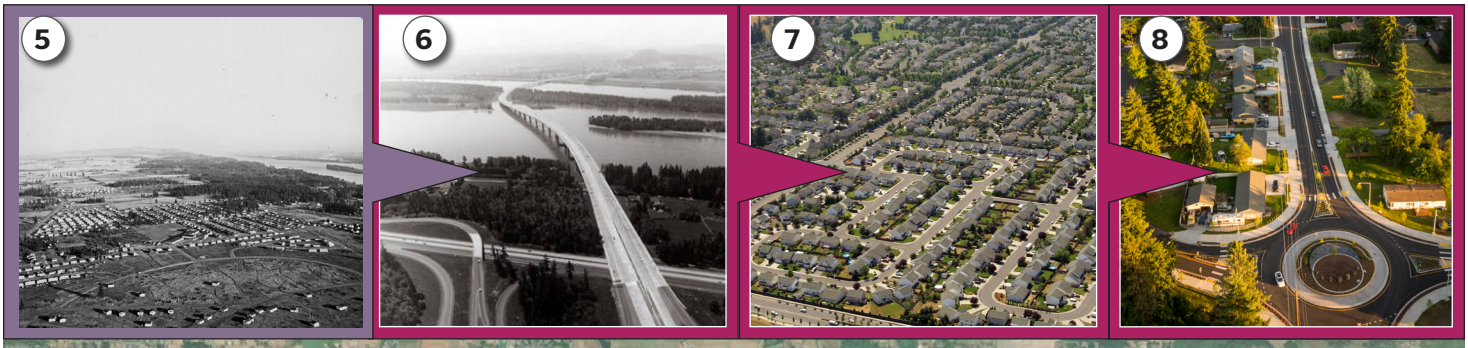
1917 The I-5 Bridge opens, providing access for motor vehicles and trolley service.

1945 Vancouver Housing Authority adopts a plan for wartime housing projects to support the growing population.



HISTORICAL DEVELOPMENT TIMELINE

The area that is now Vancouver was first inhabited more than 10,000 years ago by the Chinook and Cowlitz people. Since the establishment of Fort Vancouver in 1825, Vancouver has generally expanded eastward. While distinct planning efforts over time, such as the 1994 Visions for the Vancouver Urban Area, have aimed to focus Vancouver's growth into centers and corridors, additional suburban expansion has continued to occur through annexations.



1957 City of Vancouver adopts its first comprehensive plan, establishing segregated land uses and residential street patterns.

1973 Oregon adopts Senate Bill 100, which establishes limits on urban growth and pushes residential growth toward Vancouver.

1982 Infrastructure-driven growth expands the population and city size; I-205 opens, increasing access between Portland and Vancouver.

1997 Guided by the 1994 comprehensive plan, Vancouver annexes a large area of unincorporated Clark County, adding 58,000 new residents which nearly doubles the population.

2010 - 2020 Job opportunities and relatively low cost of living continue to grow the city. The population increases by 30,000 new residents and BIPOC communities in Clark County grow by nearly 60%.

CELEBRATING OUR COLLECTIVE HISTORY

Today, Vancouver is a spirited and vibrant community known for its natural beauty, cultural richness, and community-led efforts to preserve, educate, and celebrate its history through initiatives and organizations. The City of Vancouver plays a key role as an educational and cultural hub in the larger metropolitan region.

Historic preservation is crucial to the community and fabric of Vancouver. Multiple organizations and services in the City of Vancouver, including the Historic Trust, and the National Park Service, work to preserve the City's heritage and historic landmarks.

The Historic Trust is an organization that manages several City-owned historic properties and educates residents and visitors about Vancouver's community and history. The Historic Trust organizes a variety of engaging programs and events for visitors. These include military history talks on The Vancouver Barracks, interactive games, First Friday concerts features The NE Plus Ultra Jazz Orchestra, informative lectures, museum history talks, and guided tours.[93]

The Historic Trust signed a master lease with the City of Vancouver in 2006, which allowed the Trust to maintain and preserve historic structures such as Officers Row, the West Vancouver Barracks, and other associated residential and commercial leases consisting of the Artillery Barracks, the Evergreen Arboretum, the Marshall House, the O.O. Howard House, the Providence Academy Ballroom and Chapel, and the Red Cross Building.[94]

The National Park Service (NPS) provides a range of activities and programs, including the Vancouver National Historic Reserve. The National Historic Reserve includes 252 acres of protected land and was recognized congressionally in 1996. It is considered to be the foremost historic archaeological site in the Pacific Northwest and includes many recorded archaeological sites, most of which are also on the National Register.[95]

The NPS oversees the City's main historic landmark, Fort Vancouver. Fort Vancouver and its surrounding areas offer several fascinating places to explore and delve into the area's history, and is culturally significant to the greater region. The NPS aims to preserve and educate the public about both the evolved history of Fort Vancouver and its current conditions.[96]

The NPS provides many different services and opportunities for programming for all ages. These programs include opportunities for passive and active recreation, visiting the Fort Vancouver Garden or the Japanese Castaways' Memorial, and indoor activities including watching a blacksmith work or learning what it takes to be a Junior Ranger at the Fort Vancouver National Historic Site. Educational opportunities for students include field trips, youth volunteer programs, and other training programs to encourage learning and growth.[97]

The NPS also oversees several other fascinating historic places that preserve and educate Vancouver's dynamic cultural history, including the Pearson Air Museum, The Village, The Vancouver Barracks, and the McLoughlin House.[98] Additional historic programming in the City of Vancouver includes military history talks, lectures, Providence Academy tours, Marshall House tours, and Botanic Garden self-guided tours.[99]

EQUITY FRAMEWORK

As part of the Comprehensive Plan and Title 20 Update Equity Framework, the City of Vancouver has documented historic actions that have informed present day Vancouver's built form. A summary of this information can be found in the historic timeline on Page 42, with full document available on the City's community engagement website Be Heard Vancouver (www.beheardvancouver.org).



Figure 35: Marshall House Vancouver Barracks

HISTORIC SITES + DISTRICTS MAP

The purpose of this map is to identify areas of historic significance in the City. This map depicts historic sites in the city. The data is divided into 3 categories: the National Register of Historic Places, the Washington State Heritage Register, and the Clark County Heritage Register & Historic Resource Inventory.

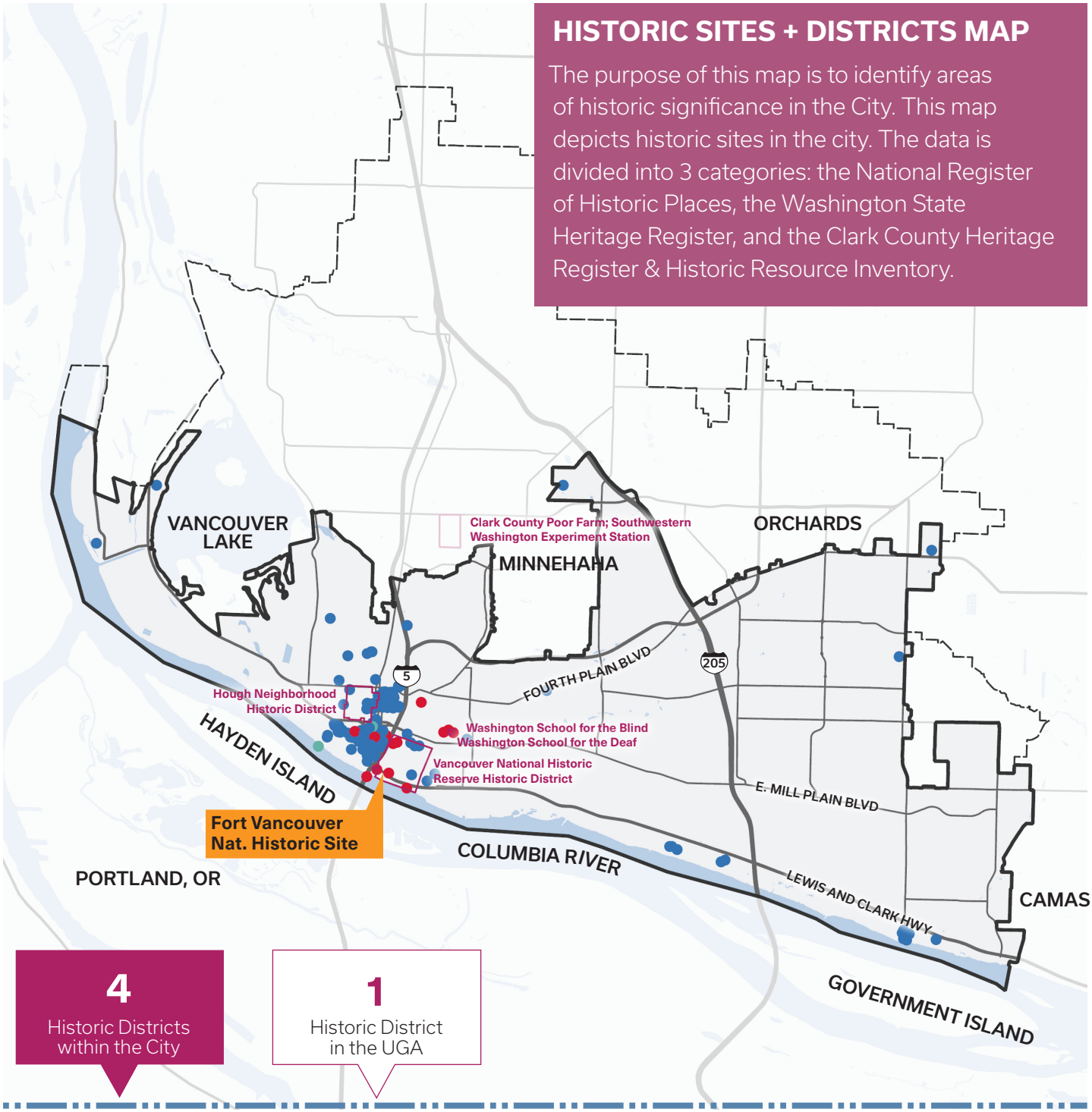


Figure 36: Historic Sites Map

City Boundary
UGA
Waterbodies
Historic District

Historic Register
National Register of Historic Places
Washington State Heritage Register
Clark County Heritage Register & Historic Resource Inventory

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

HISTORIC PRESERVATION PROGRAM

The Clark County Historic Preservation Commission coordinates historic preservation for Clark County, including the City of Vancouver. The Commission's responsibilities include maintaining the local Heritage Register and administering historic preservation incentive programs.[100]

The City's Historic Preservation Ordinance ensures the recognition, assessment, and safeguarding of cultural and historic assets within Vancouver. It actively promotes the preservation, restoration, and rehabilitation of these resources, ensuring their conservation for the benefit of current and future generations.[101]

The Vancouver Municipal Code 17.39 applies to properties in Vancouver and includes eligibility criteria for historic and cultural resources in Clark County, in addition to the National Register of Historic Places and Washington State Heritage Register.[102]

The City of Vancouver also requires an archaeological predetermination, or study, which is intended to assist staff and decision-makers in understanding whether the existence of an archaeological site within a development or disturbance site is likely. This study is linked to the Archaeological Probability Map. These regulations include requirements, exemptions and standards to assist development applicants and city staff in understanding site context and importance.[103]

The City also has a large number of mid-20th century buildings (approximately forty-three residential, commercial and institutional structures) that have been surveyed. This work intends to raise awareness around the significance of this architectural period and highlight the need for preservation of these properties.[104]

VANCOUVER, WASHINGTON LIST OF SITES ON THE NATIONAL REGISTER OF HISTORIC PLACES

- Anderson-Beletski Prune Farm
- Chumasero-Smith House
- Clark County Courthouse
- Clark County Poor Farm - Southwester Washington Experiment Station
- Covington House
- Elks Building
- Evergreen Hotel
- Fort Vancouver National Site
  - Pearson Air Museum
  - Fort Vancouver Visitor center
  - Japanese Castaways' Memorial
- Hidden Houses
- House of Providence
- John P. and Mary Kiggins House
- Kiggins Theater
- Luepke Florist
- Heye H. and Eva Meyer Farmstead
- Officers Row, Fort Vancouver Barracks (21 Houses)
  - Ulysses S. Grant House
  - General O.O Howard House
  - George C. Marshall House
  - The Marshall House
  - Vancouver Barracks Post Hospital
- Slocum House
- John Stanger House
- U.S. National Bank Building
- U.S. Post Office - Vancouver Main
- Vancouver National Historic Reserve Historic District
- Vancouver Public Library
- Vancouver Telephone Building
- Vancouver-Portland Bridge
- Vancouver Washington School for the Blind
- McLoughlin House



Figure 37: Slocum House and Esther Short Park

SPOTLIGHT ON ARTS + CULTURE

The City of Vancouver boasts a vibrant cultural scene. The arts play a vital role in enhancing the unique character and identity of Vancouver.

The City is home to a variety of artists, arts, and cultural organizations. This rich artistic landscape not only provides vibrancy to the City but also contributes to its economic prosperity, health, and overall well-being through the provision of public art installations and murals throughout parks, open spaces and along sidewalks. The City currently owns over 20 pieces of outdoor art and has over 50 murals within city-limits.[105]

The City of Vancouver places a strong emphasis on its culture, arts and heritage. To support these efforts, the City adopted the Culture, Arts and Heritage Plan in 2018.[106]

The City defines culture as being conveyed through any of the following: language, customs, knowledge, cuisine, institutions, music, dance, theater, and those elements which embody the distinguishing characteristics of everyday existence. The City acknowledges and appreciates that art is considered to be a powerful medium to communicate, evoke emotion, and convey ideas. The City also understands the importance of heritage as an integral part of Vancouver's cultural fabric, encompassing traditions, languages, buildings, and other historical contexts that have been passed through generations.[107]

Through partnership with the Fourth Plain Forward, the City has seen almost 20 murals installed along Fourth Plain Boulevard through the Summer of Murals Program.[108]

Vancouver's Art, Culture, and Heritage initiative includes an inventory of the City's cultural assets and art community needs: Unique Neighborhoods, The Fort, Parks, Public Art, Downtown, Columbia River, Vancouver's Downtown Association, Leaders, Our Surrounding Natural Beauty, Leaders, National Park Service, Historical Museum, Local Artists, Arts, Dance, Theater and Music Organizations, Education System, The City Organization, Our Proximity to Portland, Art Donors, Arts and Cultural Events, Vancouver's History.[109]

CHAPTER SOURCES

88 City of Vancouver Land and People's Acknowledgment
89 City of Vancouver Equity Framework 2023
90 City of Vancouver Equity Framework 2023
91 City of Vancouver Equity Framework 2023
92 National Park Service
93 The Historic Trust
94 The Historic Trust
95 National Park Service
96 National Park Service
97 National Park Service
98 National Park Service
99 City of Vancouver
100 Clark County Historic Preservation Commission
101 City of Vancouver Municipal Code
102 City of Vancouver Municipal Code
103 City of Vancouver Municipal Code
104 Washington State Department of Archaeology and Historic Preservation
105 City of Vancouver
106 City of Vancouver
107 City of Vancouver
108 City of Vancouver
109 City of Vancouver

BUILT ENVIRONMENT



BUILT ENVIRONMENT OVERVIEW

Development in the City of Vancouver is guided and allocated by zoning, codified in Vancouver Municipal Code (VMC) Title 20, Land Use and Development Code. The City of Vancouver designates various use types within each zoning category which includes residential, commercial, and industrial zone districts in addition to specialized zone districts for mixed uses and parks and open spaces.[110]

The City of Vancouver features a range of building typologies and land uses, including residential uses (single family, duplex, multi-family) essential services, retail, commercial, industrial, civic, amenity services, and parks and recreation.[111]

The City currently reports a housing unit deficit of 4,000 units, and the housing stock will need to accomodate a growing population.[112]

The City recently updated its Transportation System Plan (TSP) which, similar to a comprehensive plan, provides visionary guidance for the future based on existing conditions, trends, community engagement, and available funding mechanisms.[113]

LAND COVER

Land cover data was obtained by the National Land Cover Database, created by the Earth Resources Observation and Science (EROS) Center. This database is updated every five years and provides historical data on landcover change taking into consideration urban imperviousness and tree canopy. Analyzing the City of Vancouver and surrounding areas reveal a high percentage of medium and high-intensity developed parcels, indicating an urbanizing environment. Between 2001 and 2019, the City of Vancouver lost approximately 22% of its shrubland cover.[114]

The analysis also indicates low levels of several land cover categories including developed open space, deciduous forest, evergreen forest, mixed forest, shrubland, grasslands, cultivated crops and woody wetlands.[115]

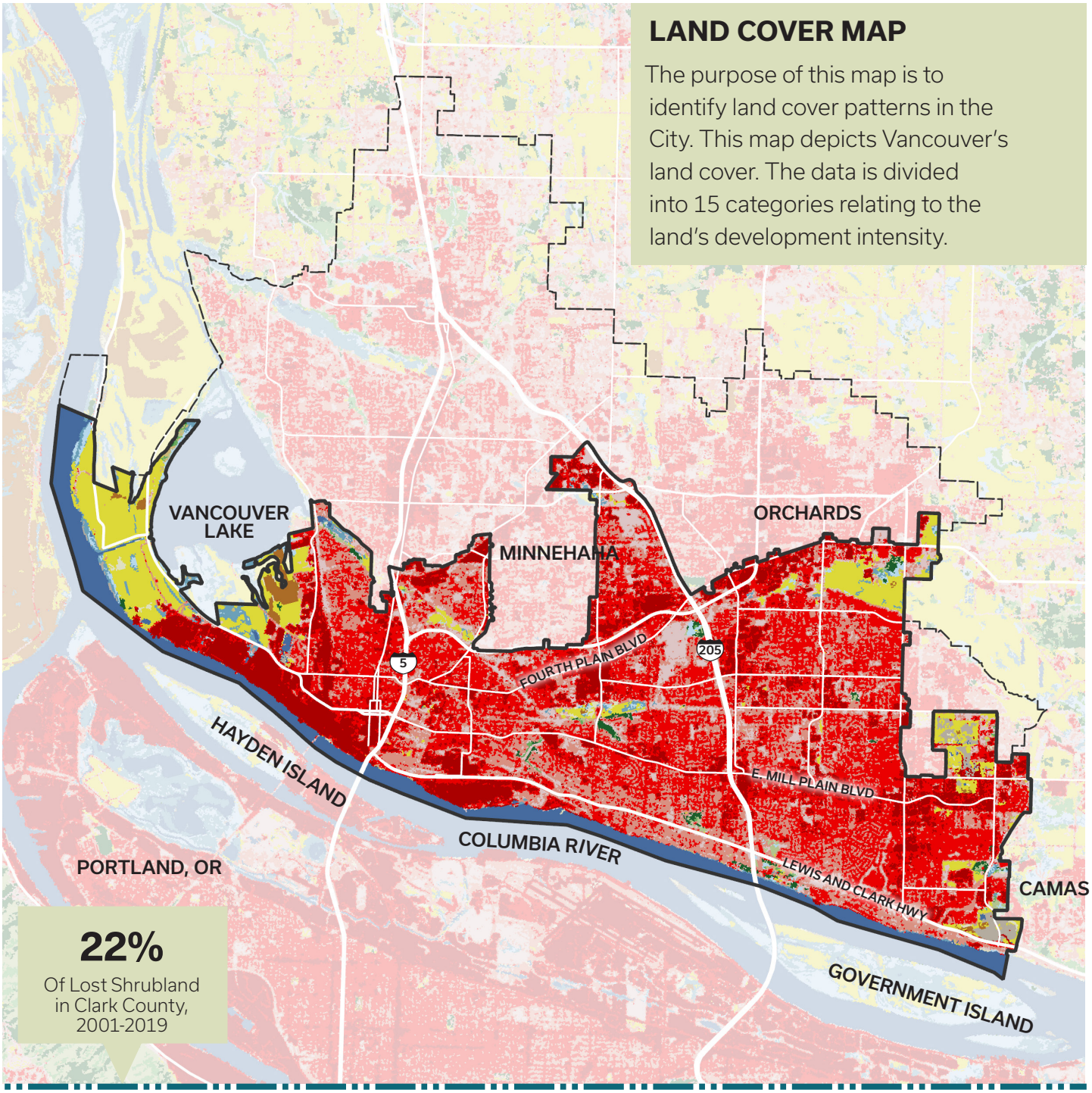
Based upon existing conditions and growth projections, the City of Vancouver can expect that trends captured in the land cover map will continue through the horizon of the Comprehensive Plan, Our Vancouver Our Future 2045. These trends align with the conditions of the Urban Growth Area.



Figure 38: Vancouver Aerial

LAND COVER MAP

The purpose of this map is to identify land cover patterns in the City. This map depicts Vancouver's land cover. The data is divided into 15 categories relating to the land's development intensity.



22%

Of Lost Shrubland in Clark County, 2001-2019

Figure 39: Land Cover Map

- City Boundary
- UGA

Landcover (2019)

- Open Water
- Developed, Open Space
- Developed, Low Intensity
- Developed, Medium Intensity
- Developed, High Intensity
- Barren Land
- Deciduous Forest
- Evergreen Forest
- Mixed forest
- Shrub/Scrub
- Grassland/Herbaceous
- Pasture/Hay
- Cultivated Crops
- Woody Wetlands
- Emergent Herbaceous Wetlands

0 0.5 1 2

miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

ZONING DESIGNATION MAP

The purpose of this map is to display how different areas within the city have been zoned. This map depicts the different zoning designations in the city. The data is divided into 6 categories: Agriculture, Single Family, Multifamily, Commercial, Industrial, and Special District Zoning.

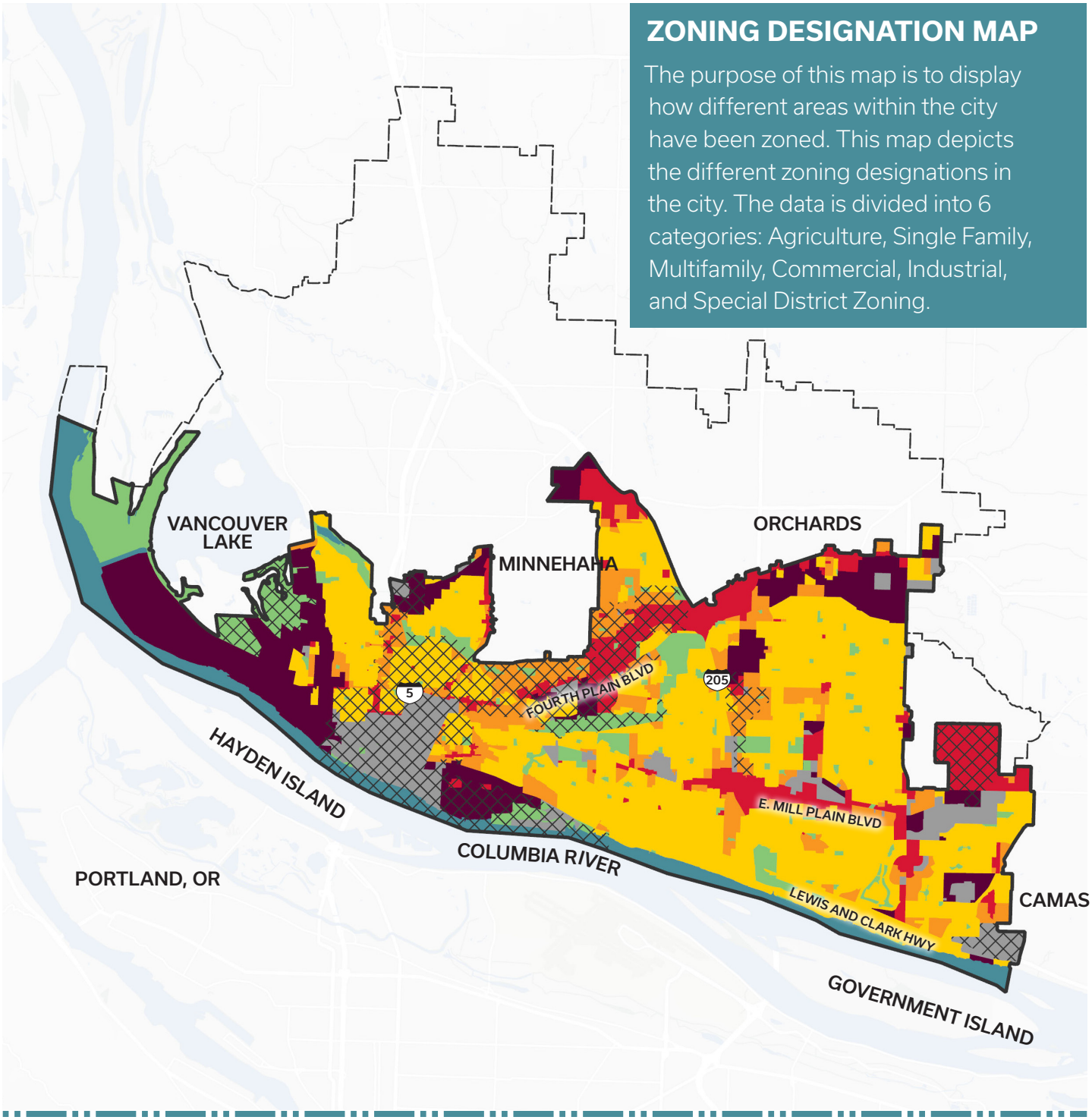


Figure 40: Zoning Designation Map

City Boundary
UGA
Waterbodies
Zoning Overlay

Zoning Designation
Parks and Open Space
Single Family
Multifamily
Commercial
Industrial
Special District
Water

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

ZONING + OVERLAYS

Given Vancouver's significant cultural, demographic, and economic transformations, assessing the existing zoning designations within the City's communities is integral to fostering a prosperous and equitable future for all residents. As part of the Comprehensive Plan and Title 20 Code Update, the City of Vancouver will conduct a thorough and comprehensive assessment of existing policies and zoning districts in order to understand how future policies and zoning code updates may better serve the Vancouver community. Zoning is an essential tool to integrate the City's diversity, equity and inclusion (DEI) principles into the built environment.

The Washington State Growth Management Act mandates that Vancouver Municipal Code (VMC) Title 20 aligns with the comprehensive plan and local community objectives.[116] This requirement ensures a sustainable and comprehensive approach to administering land use, preserving natural resources, and promoting environmentally friendly design practices. The City emphasizes the integration of cultural diversity and heritage, while simultaneously supporting and fostering a wide range of employment opportunities and businesses. Additionally, the City prioritizes the provision of high-quality urban services to residents.

The City of Vancouver designates various use types within each zoning category. Residential zoning is broken into zones of single- and multi-family housing, with the numerical value denoting the minimum lot size allocated to each zone. For instance, R-9 would require a minimum lot size of 5,000 square feet (equivalent to 9 units per acre) with a maximum building height of 35 feet.[117]

The City also establishes specific zoning requirements for commercial use, denoted by codes such as CN, CC, CG. The CN designation is the Neighborhood Commercial Zone which permits a limited range of retail services to cater to nearby neighborhoods. Maximum building height in the CN zone is 35 feet. The Community Commercial, or CC zone, serves larger areas and allows for a maximum building height of 55 feet. The General Commercial, or CG zone, generally permits a broad range of services, including major facilities, without a height limit. Additional commercial designations include the City Center (CX), the Waterfront Mixed-Use (WX), the Central Park Mixed-Use (CPX), the Mixed-Use District (MX), the Riverview Gateway District (RGX) and the Heights District (HX) zones. These additional zoning districts allow for targeted commercial and mixed-use development types with varying dimensional allowances.[118]

Industrial zones include Light Industrial (IL), Heavy Industrial (IH), and Office Commercial Industrial (OCI) and the Employment Center Mixed-Use (ECX).[119]

The City also incorporates specific specialty zones tailored to meet the community's needs, such as those designated specifically for parks or open spaces. These include Natural Areas (NA), Greenway (GW), and Park.[120]

BUILDING USES

Buildings in Vancouver include residential uses (single-family, duplex, multi-family) essential services, retail, commercial, industrial, civic, amenity services, and parks and recreation. As indicated in the building use map, the predominant portion of parcels are residential uses, either single-family or duplex residences. However, there are concentrations of multi-family units along the Fourth Plain corridor and to the north and south of the Mill Plain corridor.

Information from the City of Vancouver Development Dashboard indicates there are over 2,000 applications for residential development as of Q4 2023, which includes renovations, additions, and new construction in various stages of development. The City also has almost 550 multifamily residential applications, 883 building commercial use applications, and 47 mixed-use residential use applications. Commercial use permits are generally located along major thoroughfares while mixed-use residential permits have been concentrated in downtown Vancouver and along Fourth Plain Boulevard. Multi-family projects are dispersed across downtown Vancouver, Fruit Valley, and central Vancouver neighborhoods including Central Park, Bagley Downs, Harney Heights, Edgewood Park, Ogden, Marrion and Burton Ridge.[121]



Figure 41: Single Family Home



Figure 42: Multi-Family Housing



Figure 43: Subdivision



Figure 44: Commercial Corridor

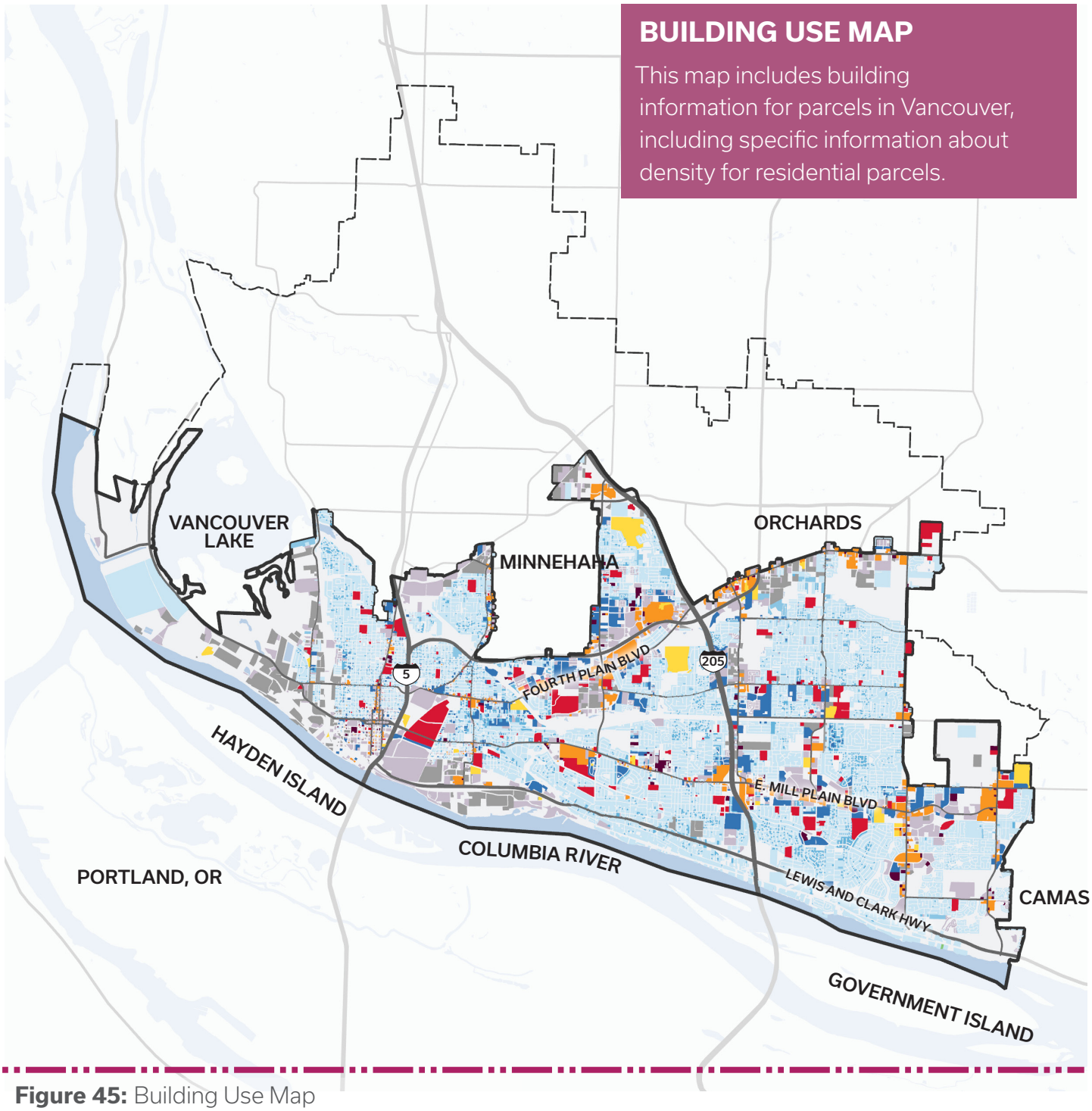


Figure 45: Building Use Map

HOUSING

Vancouver's housing market has experienced significant changes and challenges over the past decade. This is especially true in recent years, as trends have shifted through the COVID-19 pandemic. The average value of a single-family home has grown significantly and while median income has also increased, it has not tracked with the 129% increase in home value.[122] In 2021, the median monthly mortgage payment was $1,734 and in March 2022, the average market rent for a 1-bedroom unit in Vancouver was $1,411.[123]

A large portion of Vancouver renters are cost-burdened, meaning more than 30% of their income is spent on rent. Over 20% of residents are considered extremely cost-burdened, spending more than 50% of their income rent.[124] Rental cost burden threatens other aspects of security and wellbeing for vulnerable populations, including important measures like food security. While there has been a significant uptick in the total number of housing units in Vancouver between 2010 and 2021, there is still a deficit both in Vancouver and at a County level. This shortage has contributed to rental affordability challenges for Vancouver community members.[125]

Approximately, 48% of Vancouver residents rent their home. This is a large renter population compared to Clark County (34%), Washington State (36%) and the United States (35%).[126]

In 2021 there were 83,868 housing units in Vancouver, a 32% increase from 63,620 in 2010. There is an estimated deficit of 13,500 housing units in greater Clark County (7% of the existing housing stock), including a 4,000-unit deficit within the City of Vancouver (5% of the existing housing stock).[127]

There has been significant public investment in the Waterfront and Downtown areas in recent years, and private investment has followed in the form of new multi-family housing, retail and commercial spaces. It is important to stabilize affordable housing options in neighborhoods targeted for public investment so that households of lower economic means can enjoy the benefits of infrastructure and amenity improvements.[128]

HOUSING NEEDS ASSESSMENT

The City of Vancouver is currently creating an updated Housing Needs Assessment which provides in-depth detail on recent market trends. The full document can be found in the City's community engagement website Be Heard Vancouver (www.beheardvancouver.org).



Figure 46: Multi-Family Housing Development

HOUSING STOCK

There is an estimated 4,000-unit housing deficit within the City of Vancouver. Of the 3,481 vacant housing units in Vancouver, only 31% are for rent.[129]

Vancouver's housing stock is fairly young, with most structures built between 1990 and 1999. The median year built is 1985.[130]

More than half of housing units in Vancouver are detached single-family structures. However, between 2019 and 2021, 80% of new construction in Vancouver was multifamily. Around 2,000 of Vancouver's 79,000 housing structures are mobile homes.[131]

HOUSING VULNERABILITY

Based on an assessment conducted for the Reside Vancouver Plan, Central Vancouver is the most socioeconomically vulnerable area in the City, specifically the Meadow Homes and Maplewood neighborhoods.[132]

As of Q2 2023, Clark County's Housing Affordability Index (HAI) was 68.2, meaning that a family earning the median household income has 68.2% of the income necessary to qualify for a loan covering 80% of a median-priced home. This value indicates that there is an affordability gap in Clark County's housing market.[133]

INCOME-BASED HOUSING

Vancouver Housing Authority (VHA) is the public housing authority for Vancouver. VHA currently administers approximately 200 public housing units, 3,350 Housing Choice Voucher units and 25 units of local, non-traditional housing.[134]

VHA is a participating agency in the Moving to Work (MTW) program under the U.S. Department of Housing and Urban Development (HUD). Under the MTW program, VHA is granted the flexibility to design and test innovative, locally designed strategies that use Federal dollars more efficiently and increase housing choices for low-income families.[135]

HOUSING*

4,000	HOUSING UNIT DEFICIT IN VANCOUVER
31%	OF VACANT HOUSING UNITS ARE FOR RENT
80%	OF HOMES CONSTRUCTED BETWEEN 2019 AND 2021 WERE MULTI-FAMILY
89	VANCOUVER'S HOUSING AFFORDABILITY INDEX SCORE
200	HOUSING UNITS MANAGED BY THE VHA
3,350	HOUSING CHOICE VOUCHER UNITS MANAGED BY THE VHA
25	NON-TRADITIONAL HOUSING UNITS MANAGED BY THE VHA
2,000	OF 79,000 HOUSING UNITS IN VANCOUVER ARE MOBILE HOMES

*Note that this data is current as of the time of this report, and that data will be updated as part of the Comprehensive Plan process.

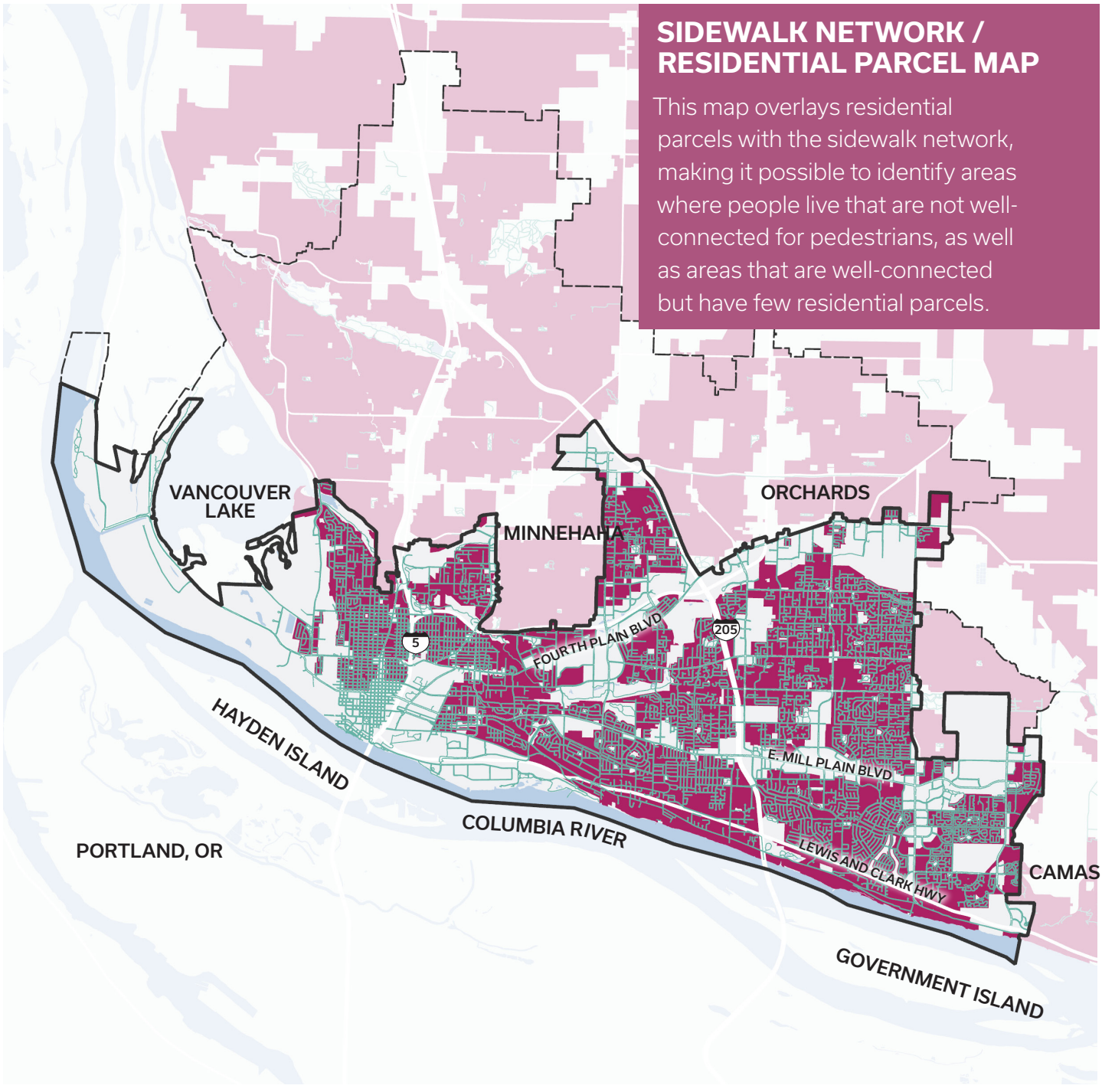


Figure 47: Sidewalk Network / Residential Parcel Map

City Boundary
UGA
Waterbodies
Sidewalk
Residential Zoned Parcels

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA



Figure 48: Sidewalk Network

CURRENT HOUSING POLICIES

- **Affordable Housing Fund (AHF):** In 2016, Vancouver established a $42mm AHF. This fund can be used to build and preserve long-term affordable housing, provide shelters to people experiencing homelessness and provide rental assistance to households at risk of eviction. The AHF was set to expire in 2023 but should be renewed to protect residents experiencing housing insecurity.[136]
- **Emergency Rental Assistance (ERA) Program:** $1.25mm of the AHF is allocated annually to support the existing ERA Program, but given the impending expiration of the AHF, the ERA Program may need to secure alternate funding. Following the renewal of the AHF, the ERA Program should be expanded to keep pace with demand.[137]
- **Land Acquisition and Management Strategy:** Vancouver should develop a strategy to acquire and redevelop publicly owned land by transferring its properties to affordable housing developers.[138]
- **Community Land Trust (CLT):** A CLT acquires land to maintain housing affordability in perpetuity. Existing CLTs in Vancouver include Proud Ground and Evergreen Habitat for Humanity.[139]

POLICIES TO CONSIDER

- **Right of First Refusal Program:** A Right of First Refusal allows CLTs the first option to purchase residential properties. This allows the CLT to purchase the property at full market value and maintain it at affordable levels in perpetuity to provide either rental or homeownership opportunities to low-income households.[140]
- **Amended Multifamily Tax Exemption (MFTE):** The Multifamily Tax Exemption could be restructured to require developers seeking the 8-year property tax exemption through the 'Development Agreements' route to instead form Community Benefits Agreements (CBAs). CBAs would allow community organizations and residents to have input in the outcomes and processes associated with new development.[141]

TRANSPORTATION

Vancouver is home to the region's first bus rapid transit (BRT) system. The BRT is known as the Vine BRT and it runs along the Fourth Plain corridor. The Vine BRT opened in 2017 and has since decreased travel time for riders by 12%, with up to 10 minutes saved per trip. Bus ridership has increased by 45% while per-passenger cost decreased by 21%. Bus routes in Vancouver connect residents within the city and to Portland and neighboring municipalities. Approximately 25% (47,679) Vancouver residents live within a quarter mile of the Mill Plain BRT and the Vine BRT.[142]

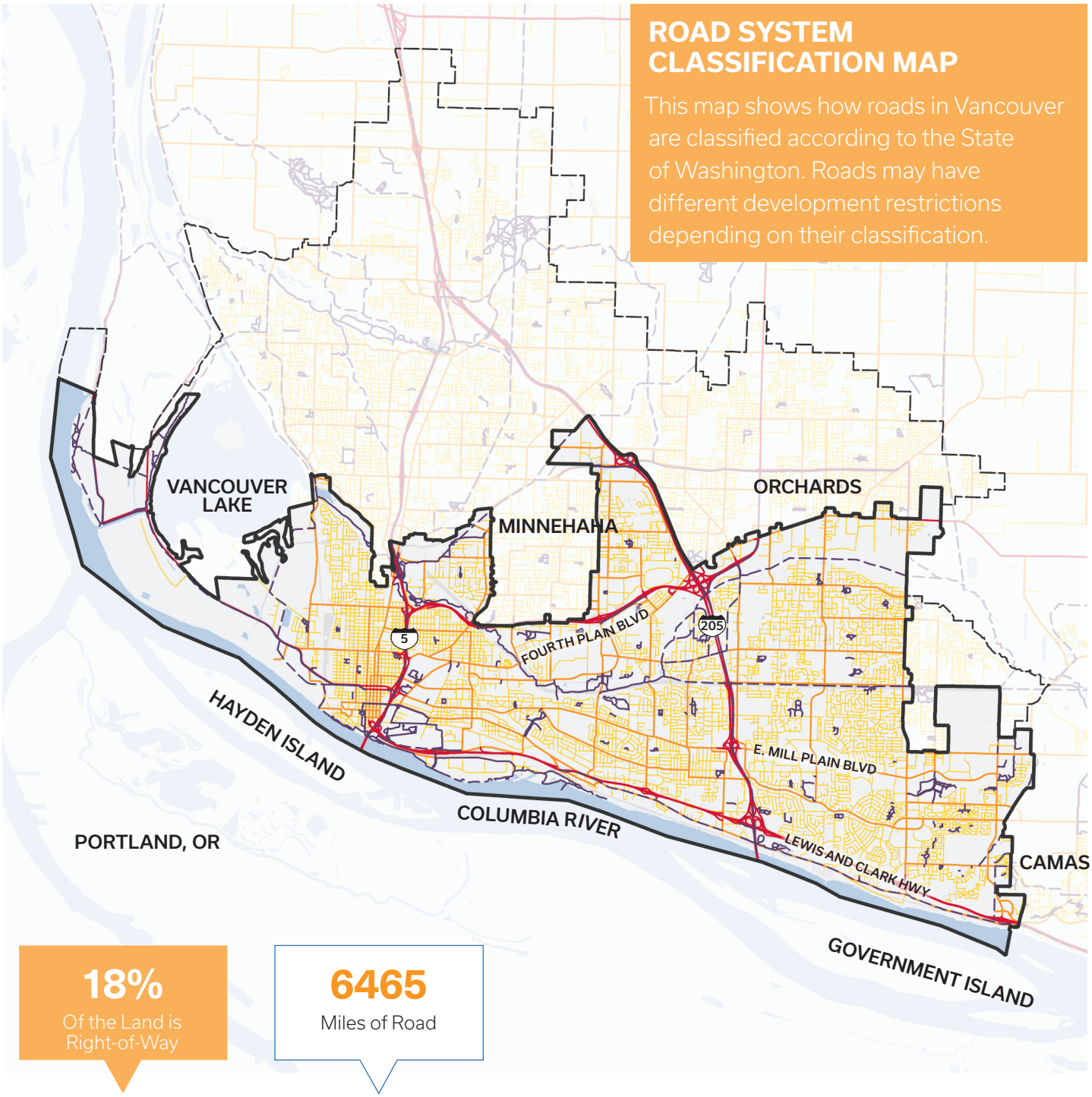
As of 2021, 82% of Vancouver residents drove to work. Additionally, car crashes increased by 29% between 2010 and 2019. The 2024-2044 Transportation System Plan (TSP) proposes a framework for future transportation investment intended to reduce car dependency and improve mobility safety for all, regardless of ability, age, race, ethnicity or income.[143]

TRANSPORTATION SYSTEM PLAN

- The City's transportation system is guided by the Transportation System Plan (TSP), which provides policy direction on transportation infrastructure investments in the City but also looks regionally to support transportation needs.
- The Plan covers all forms of mobility including travel by car, transit, bicycle and wheelchair.
- Similar to the Comprehensive Plan, the TSP captures existing conditions and trends and utilizes community input to guide the development of policies, programs and projects that reflect the needs of all community members and those who travel in, around, and through the City of Vancouver.
- In 2024, the City of Vancouver published its newest update to the TSP, which was last updated in 2004. Community engagement established a set of initial project goals, including safety, equity, climate, transportation choices, regional connectivity, and maintenance. An updated plan with existing condition findings and proposed policies and recommendations can be found on the City's website.
- The initial project goals for the TSP are related to those that will likely guide the development of the Comprehensive Plan Update, including how to create connected thriving neighborhoods, how to create complete corridors, how to connect community members to transit opportunities, how to promote and protect pedestrians and cyclists and how to evolve with changing transportation technologies.

ROAD SYSTEM CLASSIFICATION MAP

This map shows how roads in Vancouver are classified according to the State of Washington. Roads may have different development restrictions depending on their classification.



18%
Of the Land is Right-of-Way

6465
Miles of Road

Figure 49: Road System Classification Map

City Boundary
UGA
Waterbodies

Trails
Existing
Conceptual

Roads
Highway
Arterial
Collector
ROW

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

TRAFFIC COUNTS MAP

The purpose of this map is to categorize streets in Vancouver by their average daily traffic. The streets highlighted in red see the highest traffic volume, while streets highlighted in yellow see the lowest traffic volume.

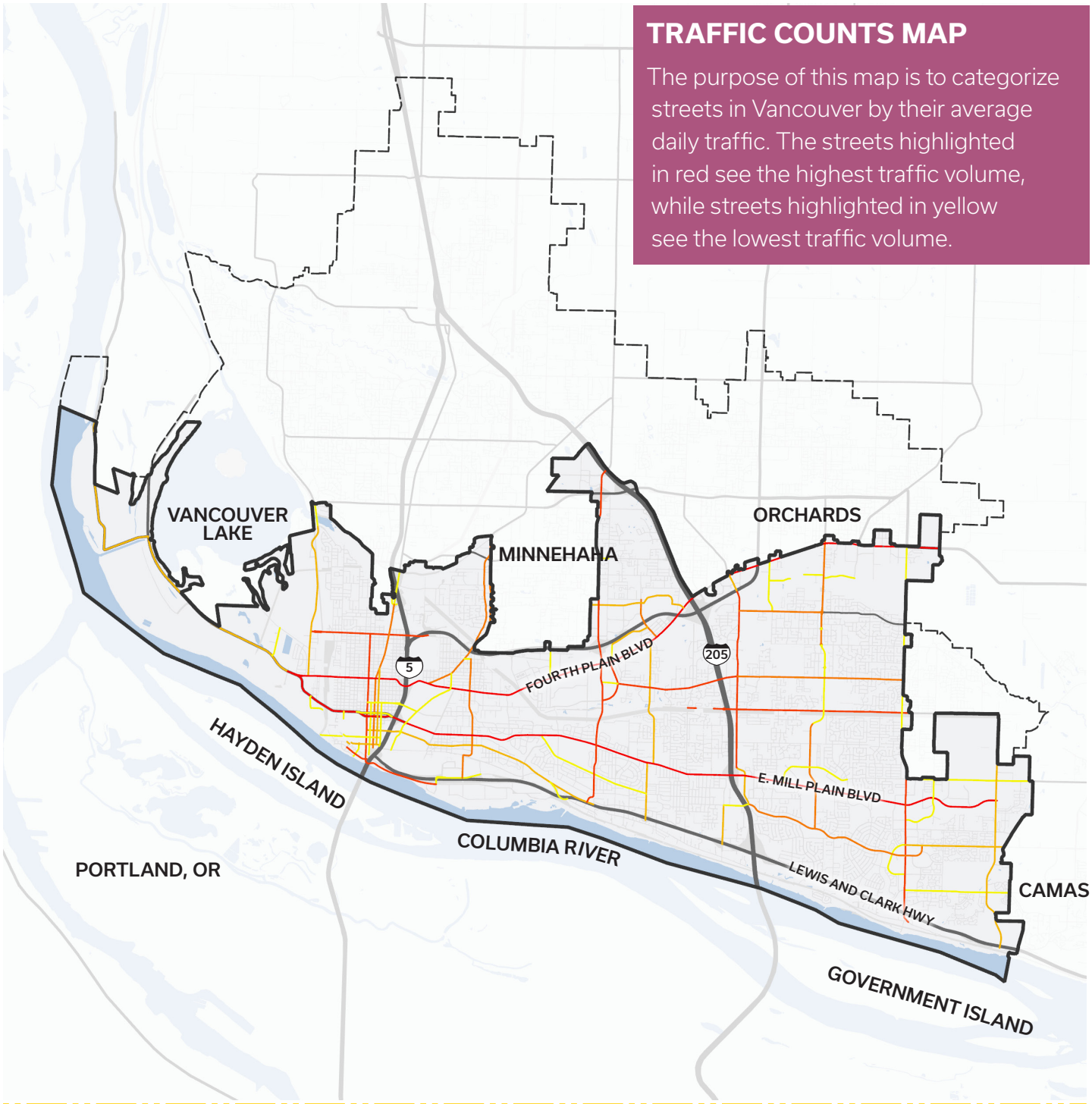


Figure 50: Traffic Counts Map

City Boundary
UGA
Waterbodies

Average Daily Traffic (in 1000s)
<6
1-13
14-26
27-52
>53

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

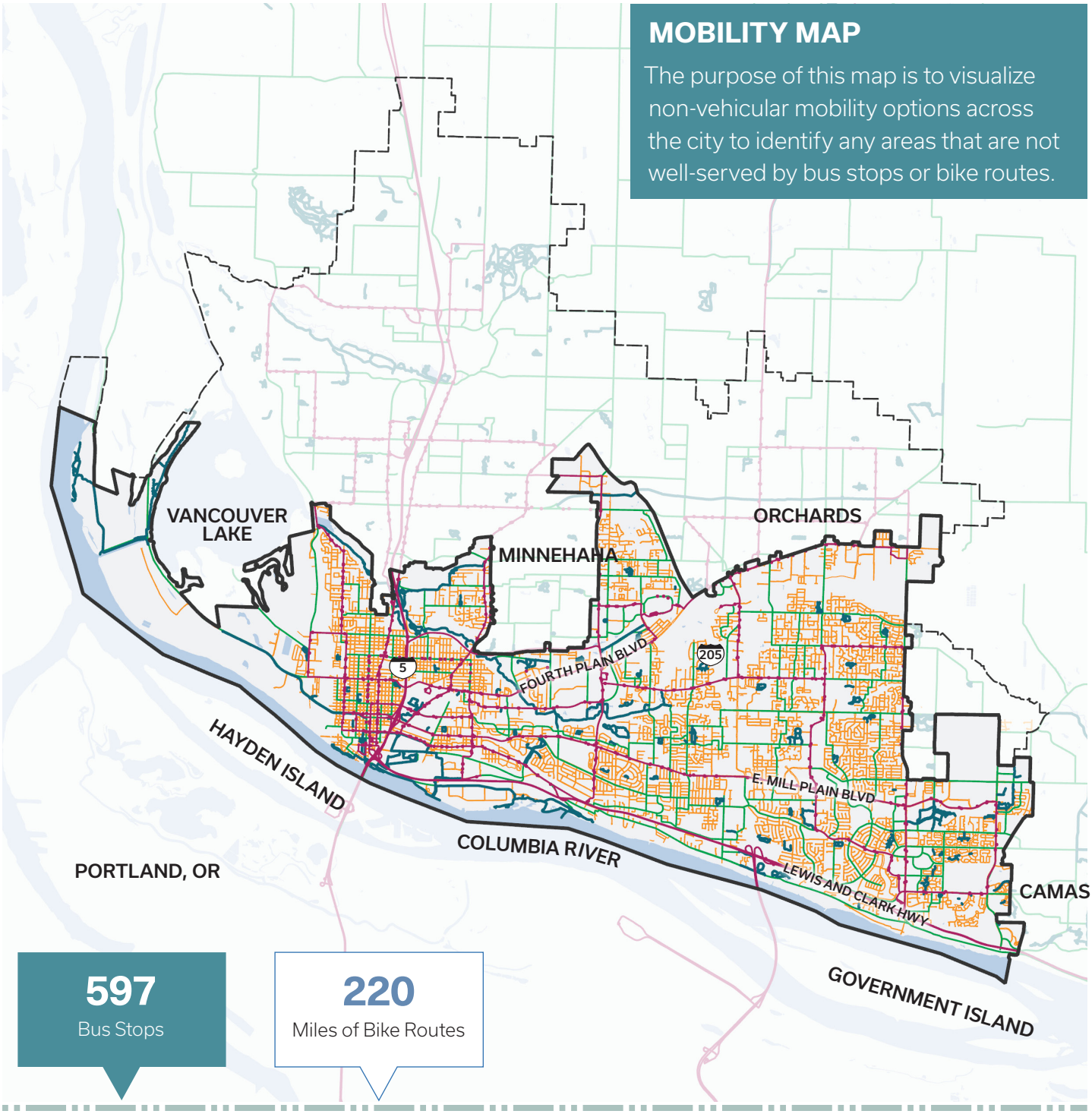


Figure 51: Mobility Map

City Boundary
UGA
Waterbodies
Bus Route and Stop
Trail
Bike Route
Sidewalk

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

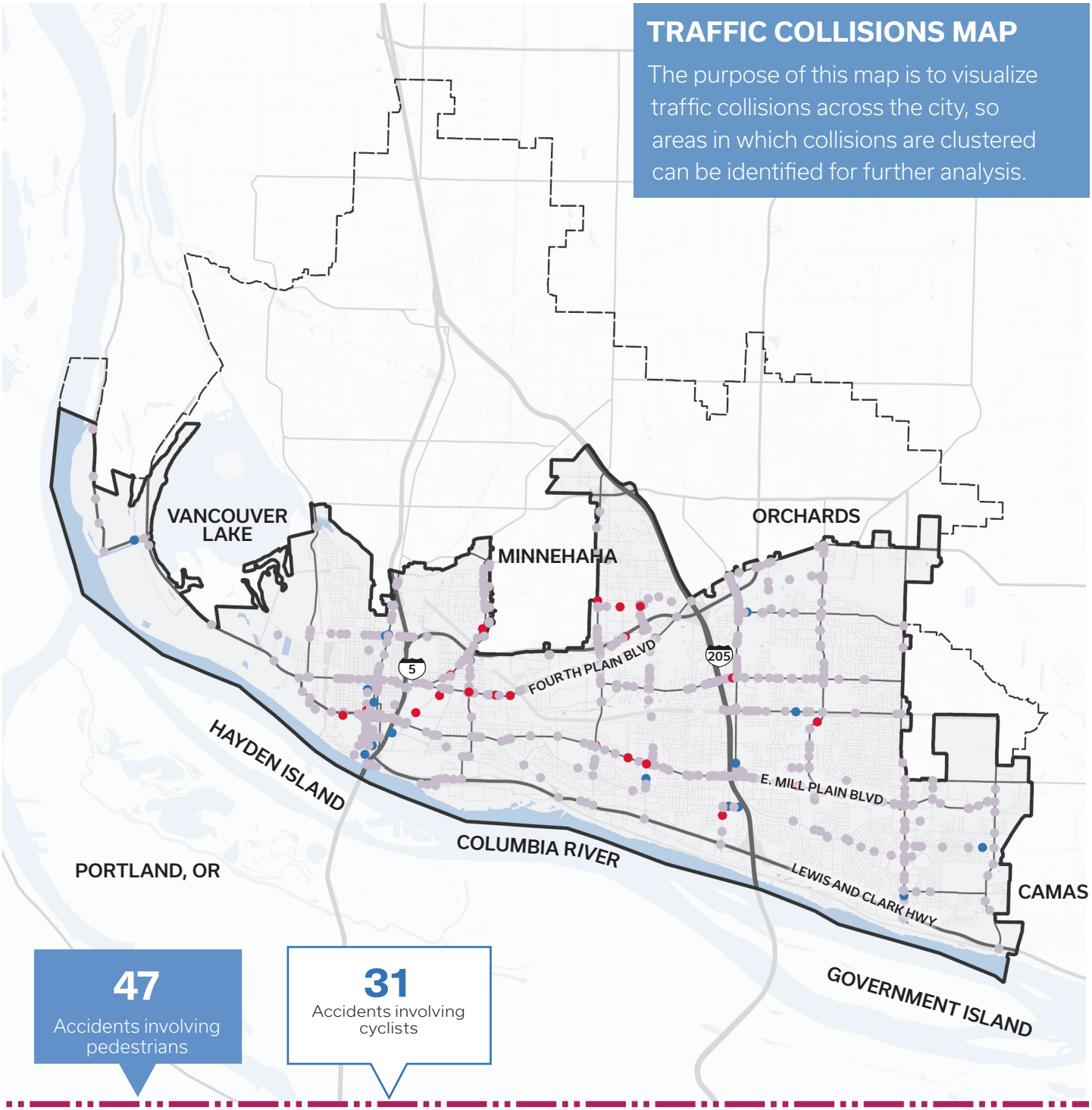


Figure 52: Traffic Collisions Map

ONGOING PLANS + RECENTLY COMPLETED EFFORTS

- **Transportation System Plan:** Vancouver is on track to adopt a new Transportation System Plan in Spring 2024.
- **Fourth Plain Boulevard and Fort Vancouver Way:** The roadway will be reconfigured and repaved. The plan will evaluate the potential of repurposing a travel lane to improve safety, mobility and accessibility.
- **SE 34th Street:** The street will receive a microsurfacing treatment. The plan will evaluate the potential of adding bicycle facilities, slowing speeding vehicles and increasing transit access.
- **McGillivray Boulevard:** The plan will evaluate safety improvements to better meet the needs of pedestrians, bikers, people using mobility devices and drivers. Ahead of a planned pavement project, the plan will also explore opportunities to improve safety and comfort on the corridor.
- **Tech Center Drive:** The road received safety improvements, increased multimodal access to a major employment center and filled an important gap in Vancouver's bike network. Improvements were completed in 2021.
- **McLoughlin Boulevard:** Permanent speed cushions and flashing light intersection crossings were installed along the boulevard. The road included a pilot of buffered bike lanes and "sharrows" (shared lane markings). Improvements were completed in 2019.
- **Columbia Street Safety and Mobility Project:** The street will receive paving, microsurfacing and mobility improvements along with additional street trees.

CHAPTER SOURCES

110 Vancouver Municipal Code
111 City of Vancouver
112 ECONorthwest; City of Vancouver
113 City of Vancouver Transportation System Plan
114 National Landcover Database
115 National Landcover Database
116 Washington State Growth Management Act
117 Vancouver Municipal Code
118 Vancouver Municipal Code
119 Vancouver Municipal Code
120 Vancouver Municipal Code
121 City of Vancouver Development Dashboard
122 2020 Decennial Census, US Census Bureau
123 Co-Star
124 2020 Decennial Census, US Census Bureau
125 Reside Vancouver: An Anti-Displacement Strategy
126 2020 Decennial Census, US Census Bureau
127 2020 Decennial Census, US Census Bureau
128 Reside Vancouver: An Anti-Displacement Strategy
129 ECONorthwest; City of Vancouver
130 2020 Decennial Census, US Census Bureau
131 2021 American Community Survey 5-year Estimates, US Census Bureau
132 Reside Vancouver: An Anti-Displacement Strategy
133 National Association of Realtors
134 United States Department of Housing and Urban Development; Vancouver Housing Authority
135 United States Department of Housing and Urban Development; Vancouver Housing Authority
136 Reside Vancouver: An Anti-Displacement Strategy
137 Reside Vancouver: An Anti-Displacement Strategy
138 Reside Vancouver: An Anti-Displacement Strategy
139 Reside Vancouver: An Anti-Displacement Strategy
140 Reside Vancouver: An Anti-Displacement Strategy
141 Reside Vancouver: An Anti-Displacement Strategy
142 City of Vancouver Transportation System Plan
143 City of Vancouver Transportation System Plan

ECONOMY



LOCAL ECONOMY OVERVIEW

Vancouver's strategic location along the confluence of several rivers has sustained human settlement for thousands of years.[144] As the City grows and changes, its geography and its connection to the river remains an important asset.

The Chinook people lived in what is now Vancouver for 10,000 years before European contact, and their proximity to the rivers allowed them to become prolific traders who lived in relative abundance. In 1825, the original Hudson's Bay Company (HBC) established Fort Vancouver and the City grew to become the regional center of commerce. After HBC relocated to Canada, and until the Second World War, Vancouver's economy was composed of logging and lumber mills, railroads and agriculture, primarily prune farming.[145]

World War II brought industry and population to Vancouver, but the decline in industrial jobs after the war led to unemployment, population loss and disinvestment, particularly in the African American community.[146] The construction of I-5 and later the I-205 bridge further disrupted the existing urban fabric, making downtown more difficult to access and drawing businesses away from the city.[147]

More recently, Vancouver has attracted a growing and diverse community, and it is poised to revitalize its historic industrial legacy. Situated in the heart of the Pacific Northwest, Clark County is exceptionally well-positioned to access major West Coast, Midwest and international markets through multimodal connections to I-5 and I-84, deep-water ports, rail and the Portland International Airport (PDX).[148]

EQUITY ANALYSIS FINDING

Following World War II, Vancouver's Black community experienced 77% unemployment as job discrimination ran rampant.

Today, Vancouver is relatively affordable compared to nearby cities. Forbes reports that the cost of living in Vancouver is 15% less than in Portland.[149] It attracts young working people and has a strong and diverse small business community, mostly clustered on the west side. The City is already preparing its economy for future growth and an increasingly multicultural population, and is working to expand protections and opportunities for small business ownership and revitalize its commercial corridors.



Figure 53: Heights District



Figure 54: Vancouver Waterfront Park

EXISTING ECONOMIC CONDITIONS



Figure 55: Industrial Area

INDUSTRIES

There are approximately 7,840 businesses in Vancouver. In certain neighborhoods, including Fourth Plain, at least one-third of businesses are minority owned or cater to communities of color.[150]

The largest percentage of businesses in Vancouver are in the service sector, followed by retail, then finance, insurance and real estate.[151]

As of 2019, around a third of Vancouverites commuted across the Columbia River to work in Portland, Oregon,[152] suggesting that many residents do a portion of their day-to-day spending out of state. Updated data is needed to determine how the rise of remote work following COVID-19 has affected this trend.

Clark County is a driving force behind the greater Portland-Vancouver region's reputation as "Silicon Forest", with companies like Logitech, TSMC, Silicon Forest Electronics, SEH America and others calling Clark County home.[153]

Computer and electronics is a strong legacy cluster for the county. Computer and electrics, along with other emerging high-paid industries like clean tech, software, metals and machinery and life sciences have existing clusters in Vancouver.[154]

According to the 2017 Census of Agriculture (the most recent year for which data is available), there were 750 farms in Clark County totaling nearly half a million acres and $99 million in annual sales. Vancouver also has several local purveyors of locally sourced and/or made goods including a meat and food processing establishment.[155]

27% of all parcels in the City are zoned for commercial uses. 17% of all parcels in the City are zoned for industrial uses. There are 5,583 acres of vacant land across the city, 19% (1,059 acres) of which is publicly owned. Vacant lands are based on Clark County's vacant buildable lands model and additional growth truthing will be needed as part of the comprehensive planning update process.

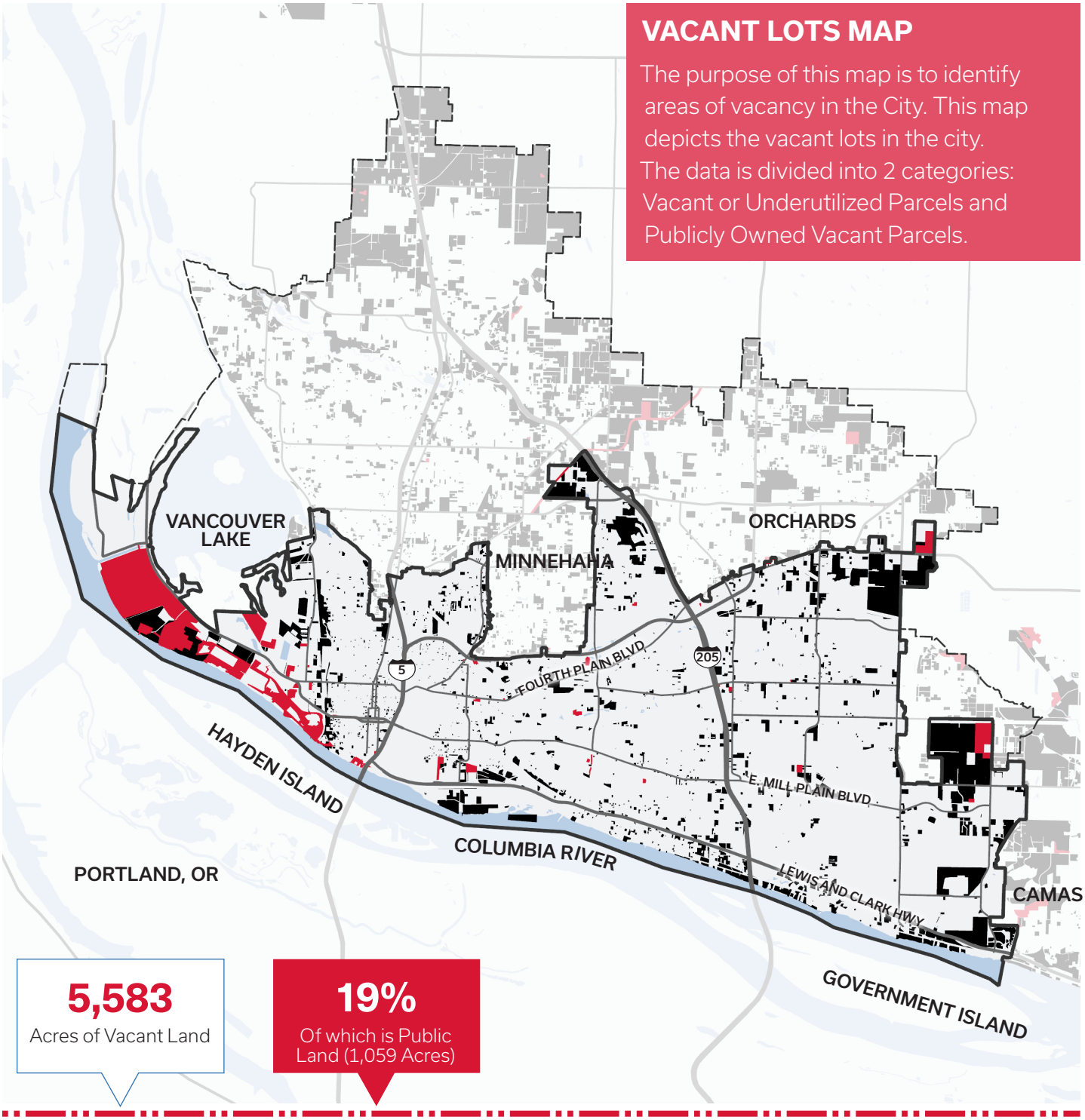


Figure 56: Vacant Lots Map

City Boundary
UGA
Waterbodies
Vacant or Underutilized Parcel
Publicly Owned Vacant Parcel

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

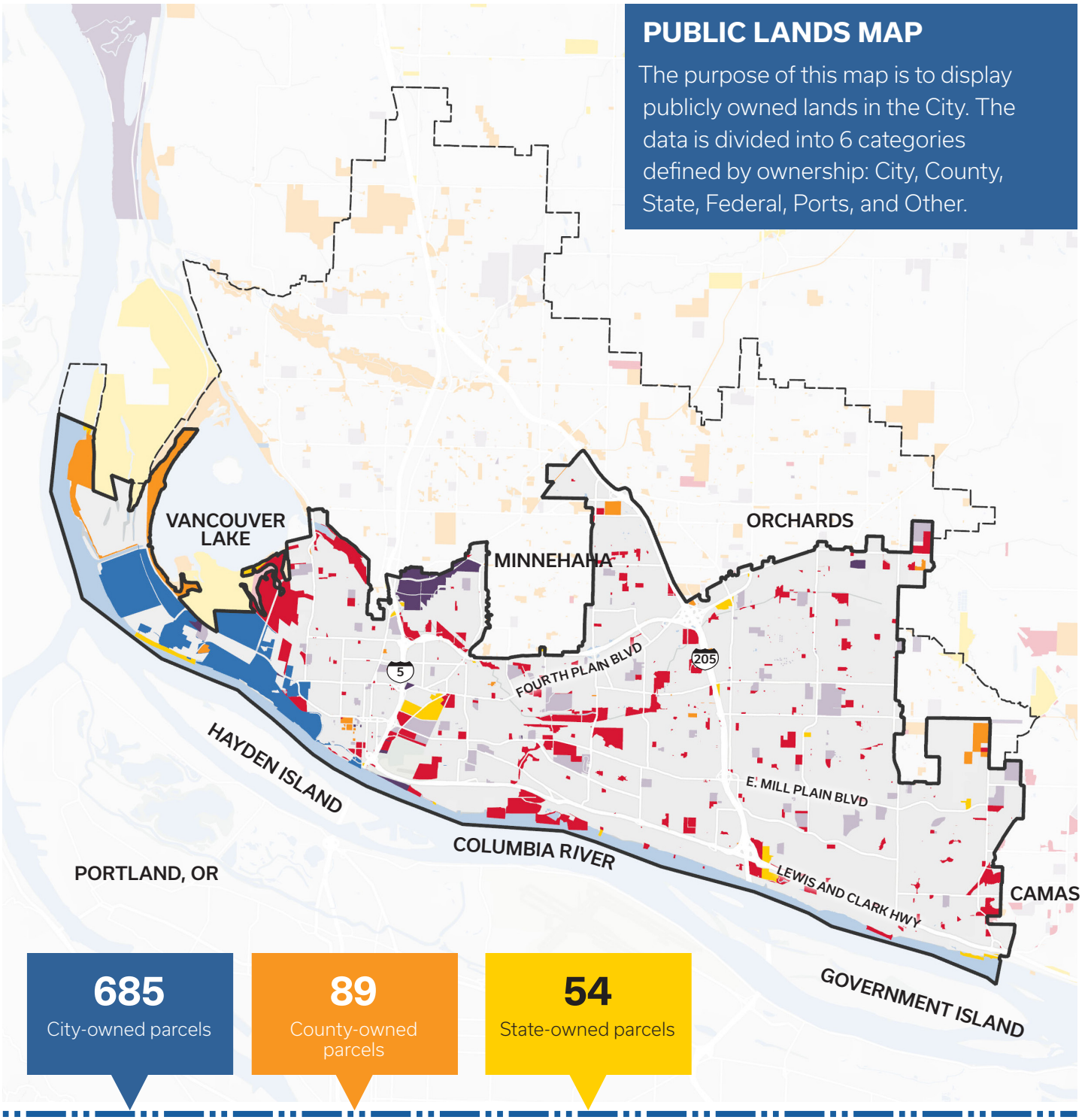


Figure 57: Public Lands Map

WORKFORCE COMPOSITION

- In 2021, the unemployment rate in Vancouver was 3.5%.[156]
- Since February 2020, Clark County gained a net 13,200 jobs, an increase of 7.8%. Clark County outperformed the nation (+0.5%), the state (+1.5%), Oregon (+0.3%), Seattle metro (+0.5%) and the Portland metro area (+1.2%) in this period.[157]
- In the first two months of COVID-19, Clark County lost 11.1% of its employment base. The county fully recovered these jobs by July 2021, much more quickly than comparable areas. Employment in June 2022 was approximately 6.2% above pre-COVID-19 levels.[158]
- Compared to the United States, Vancouver has higher-than-average employment concentrations in the transportation and real estate sectors. 57.6% of the population is employed in white collar professions, followed by 24.8% in blue collar industries and 17.6% in the service sector. This is in contrast with the city's business composition, which primarily corresponds to jobs in the service sector.[159]
- An estimated 70% of people who ***work*** in Vancouver ***live*** outside the city, while approximately 66% of people who ***live*** in Vancouver ***work*** outside the city. This suggests a potential misalignment between available jobs and housing options.[160]
- While wages have increased in general, so has wage inequality. One measure of wage disparities, the 90/10 ratio, is calculated by comparing the top 10% to the bottom 10% of wages. This figure increased from 7.8 in 2019 to 8.7 in 2021, despite a notable increase in minimum wage in 2020.[161]

WORKFORCE

3.5%	**VANCOUVER UNEMPLOYMENT RATE IN 2021**
13,200	**NET JOB GAIN IN CLARK COUNTY SINCE FEBRUARY 2020**
57.6%	**POPULATION IS EMPLOYED IN WHITE COLLAR PROFESSIONS**
24.8%	**POPULATION IS EMPLOYED IN BLUE COLLAR PROFESSIONS**
17.6%	**POPULATION IS EMPLOYED IN SERVICE SECTOR**
70%	**VANCOUVER WORKERS LIVE OUTSIDE THE CITY**
66%	**VANCOUVER RESIDENTS WORK OUTSIDE VANCOUVER**

EQUITY ANALYSIS FINDING

Wages for Black, Indigenous, Pacific Islander, and Latine workers average around 80% or less of the average for all workers.

CENTERS AND CORRIDORS

Over the past twenty years, Vancouver has embarked on numerous projects to prepare for growth and adapt to changing demographics. While several of these projects date back to the early 2000s and the last Comprehensive Plan update, there have been notable areas of growth and investment.

It will be important for the City to assess the successes and challenges faced during the implementation of policies related to the centers and corridors identified in the last Comprehensive Plan in order to identify how to update its policies to not only reflect the recently adopted Strategic Plan and focus on equity, inclusion, safety and climate change. Additional maps identifying equity analysis and 15-minute neighborhood analysis findings can be found in Appendix A: Maps.

There are several centers and corridors that have achieved a high-level of essential service provision including Fourth Plain, Vancouver City Center, Central Park, and Columbia Tech Center. Several areas need to be addressed through the Comprehensive Plan update to ensure investments counter historical inequities, including Fruit Valley, Upper Main, Minnehaha, Mill Plain (MacArthur and SWWMC) and Birtcher and N.E. Fourth Plain.

Through further analysis and the development of land use scenarios the City will be able to better understand how to balance policies to ensure that areas that have low scores on the hot spot analysis experience effective change through the horizon of the updated Comprehensive Plan.

Policy updates will take into consideration Growth Management requirements, including projected growth and demand for housing units, in addition to the priorities and goals outlined in the City of Vancouver Strategic Plan: 2023-2029 Update.

- **Fourth Plain:** The Fourth Plain neighborhood is home to many immigrants, with a thriving business community that reflects its racial and ethnic diversity. In 2007, Fourth Plain was the subject of a subarea plan that resulted in a zoning overlay and designation as a target area for Community Development Block Grant (CDBG) funds. Fourth Plain Forward, a local nonprofit, works in partnership with the City to ensure development in the area is community-led and benefits local residents and businesses. Over the next three years, the City will invest more than $25 million in American Recovery Plan (ARPA) money into the Fourth Plain area.[128]
- **112th Avenue Corridor:** 112th Avenue from NE 4th Street and NE 33rd Street was identified in the previous Comprehensive Plan as an area for concentrated growth. This area was also affected by the ongoing split diamond I-205 project. Pedestrian upgrades were ongoing as of 2020.[129]



Figure 58: Columbia Tech Center

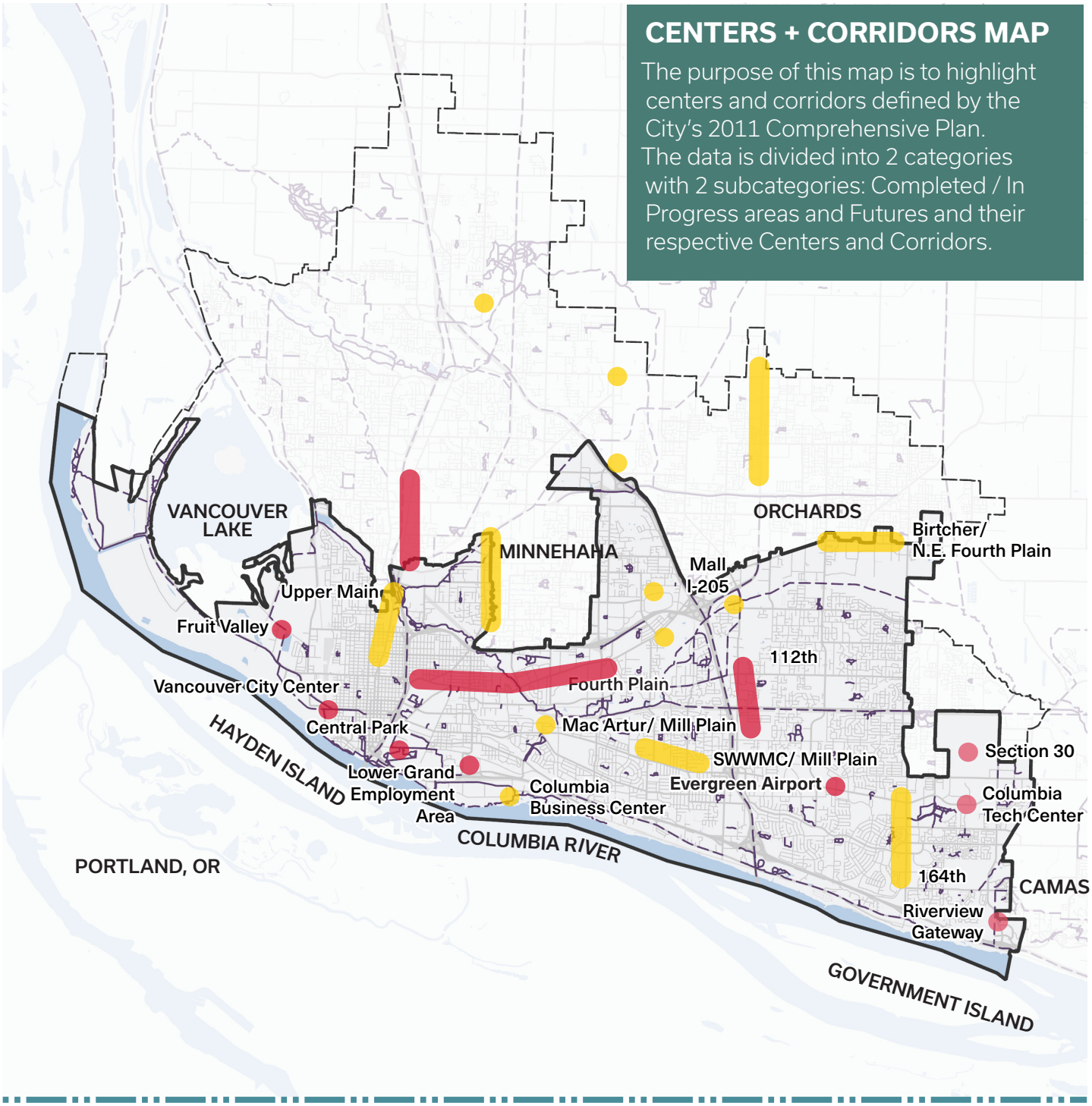


Figure 59: Centers + Corridors Map

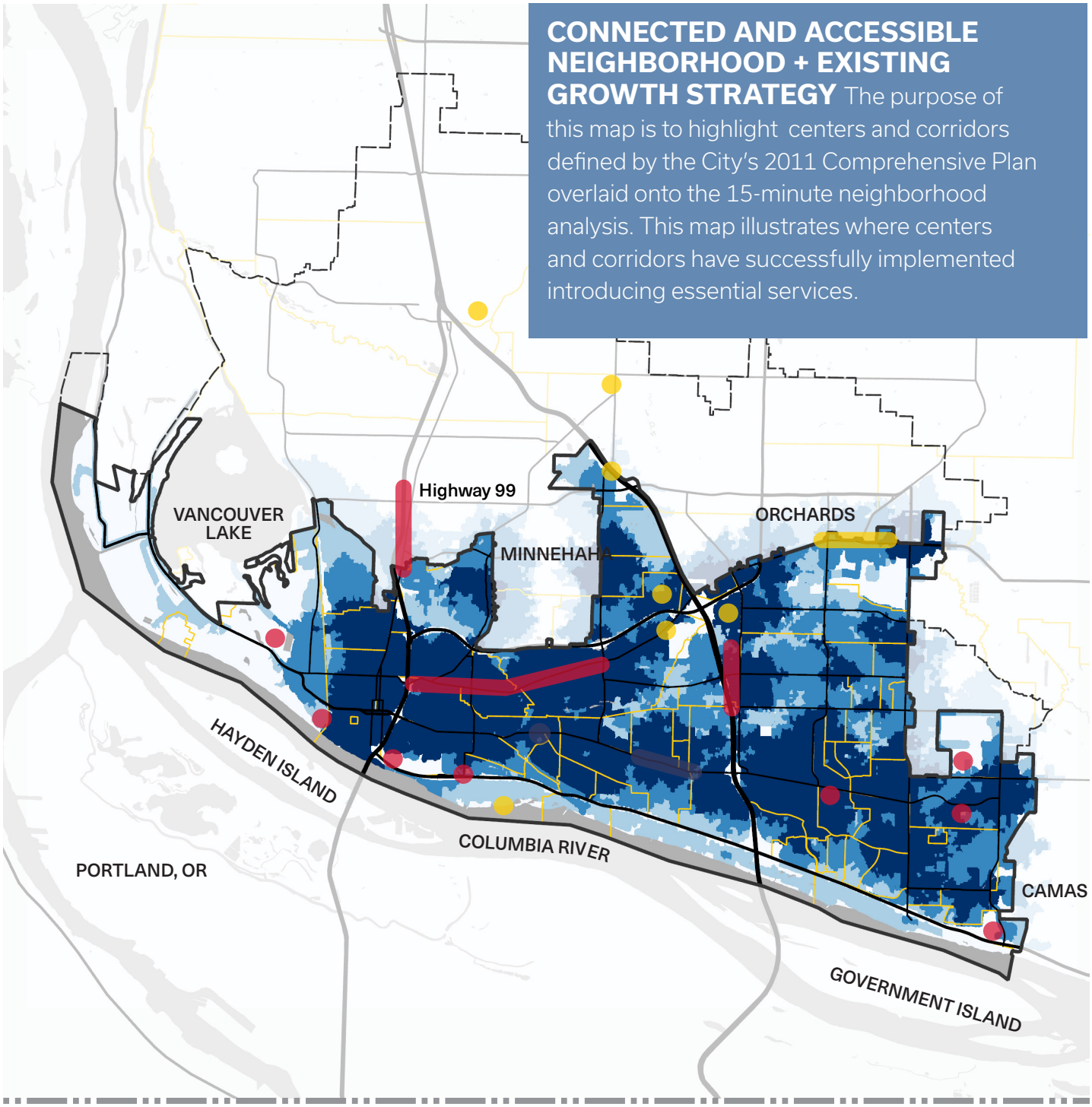


Figure 60: Connected and Accessible Neighborhood and Centers + Corridors Map

CENTERS AND CORRIDORS CONT.

- **Central Park:** The Central Park planning area is bound by I-5 to the west, the Columbia River to the south and residential neighborhoods to the east and north. It includes sections of the Hudson's Bay, Central Park and Columbia Way neighborhoods. This area was originally identified as a priority in 1979 but formal redevelopment did not begin until 2008. The majority of property in this area is primarily educational, parklands and residential areas. Ongoing projects in the neighborhood include renovations to an existing multifamily residential property and the establishment of a new Washington State School for the Blind building.[130]
- **Fruit Valley:** The City of Vancouver adopted the Fruit Valley Neighborhood Action Plan in 2008. When the plan was written, Fruit Valley was home to 55 businesses, most of which were industrial, and 61% of the study area was zoned for industrial use. Fruit Valley's industrial legacy continues today, with several industrial buildings proposed or under construction.[131]
- **Evergreen and Grand Commercial Corridors:** The Evergreen and Grand Corridors are targeted for redevelopment as part of the City's Commercial Corridor Strategy (CCS). The Evergreen and Grand subarea is subject to restricted uses, regulatory standards and improvements to the pedestrian environment.[132]
- **Vancouver City Center:** Growth in Vancouver's approximately 130-block city center is guided by the Vancouver City Center Vision (VCCV), a plan adopted in 2007. Ongoing development includes a streetscape project targeting Main Street betwewen 5th and 15th Street. Approximately $10 million in American Rescue Plan (ARPA) funding has been allocated for the redevelopment of this downtown corridor, intended to improve safety, community cohesion and economic prosperity, in line with the overall vision for Vancouver City Center.[133]
- **The Heights District:** The Heights District is a new mixed-use neighborhood on the site of the former Tower Mall. It is an opportunity for private-public partnership that provides benefits and opportunities to a range of residents. The Heights District Plan proposes the following land use plan: 1,340 residential units, 56,000 sf commercial, 65,000 sf office, 83,000 sf hospitality, 20,0000 sf church/ multipurpose, 6.1 acres parks/open space.[134]
- **Riverview Gateway:** The Riverview Gateway Plan was adopted in 2009 to guide development in Riverview Gateway, an area which offers access to downtown Vancouver, Portland airport and other destinations in Clark County. Large swaths of industrial land were identified as opportunities to transition the area into a vibrant and well-connected mixed-use neighborhood. The plan to transform the Riverview Gateway site into a mixed-use and residential community was under review by City Council as of 2021.[135]
- **Lower Grand Employment Area:** The Lower Grand Employment Area (LGEA) in Southwest Vancouver was the subject of a 2016 area plan. The plan identifies strategies to preserve and develop industrial land within the LGEA so it can remain a valuable employment center and gateway.
- **Section 30:** Section 30 was annexed by the City of Vancouver in 2008. In 2021, City Council approved the development of a multi-building campus on the site that will house the offices of HP Inc. This project is expected to catalyze further development, while its proximity to the Columbia Tech Center (CTC) will solidify East Vancouver's growing niche as a tech hub.[136]

ECONOMIC DEVELOPMENT OPPORTUNITIES

LOCAL DRIVERS

Vancouver's historic geographic advantage remains relevant today. Its quality of life, unique landscape and mild climate make it an attractive place to live. This strength has the potential to attract business owners looking to move their companies or their back-office operations to a more attractive location.

The current (2018-2023) Clark County Economic Development Plan prioritizes downtown Vancouver in the county-wide economic development strategy. As a thriving urban center, Vancouver is poised to host jobs, housing and entertainment as the region grows and changes.[162]

Clustered office campuses in East Vancouver including Columbia Tech Center (CTC) and the future home of HP Inc. offer "live-work-play" communities attracting high-tech industries and workers.[163]

The market size of the Solar Power industry in the U.S. has grown 15% per year on average between 2017 and 2022, while sales of electric vehicles in the United States more than doubled in 2021. With a strong legacy in computer and electronics, industrial land, available employment and a skilled workforce, Clark County has a competitive foundation for supporting growth in clean technology.[164]

The Washington State University – Vancouver (WSU) is part of the Washington State University system and enrolls about 2,800 students, 43% of whom are first generation. As the only four-year research institution in Southwest Washington, WSU Vancouver boasts "big school resources in a small school environment." 95% of WSU Vancouver graduates stay and work in the Portland Metro Region.[165]

Clark College is a community college in Vancouver that offers degree programs including advanced manufacturing, business and entrepreneurship, and science, technology and engineering.[166]

As the Pacific Northwest becomes increasingly expensive, Vancouver's relative affordability is a draw for young workers. It is important to leverage this asset for growth while protecting the current renter population. Similarly, Vancouver must balance incentives to attract and retain high-tech industries with efforts that support the small business community. The Columbia River Economic Development Council (CREDC) supports businesses in Clark County and the surrounding region north of the Columbia River. They provide free services to qualifying businesses and leverage private-public partnerships to connect businesses with other key resources.[167]

LOCAL ECONOMIC DRIVERS

2,800	STUDENTS AT VANCOUVER WASHINGTON STATE UNIVERSITY (WSU)
43%	STUDENTS AT WSU ARE FIRST GENERATION
95%	WSU GRADUATES STAY IN REGIONAL WORKFORCE
11,500	STUDENTS AT CLARK COLLEGE

INCENTIVES

- **Income and Sales Tax:** Washington State does not have a personal or corporate income tax. Vancouver can leverage this feature to attract businesses and residents that might otherwise settle in Portland. In contrast, Washington does have a sales tax while Oregon does not.[168]
- **Main Street Tax Credit:** The Vancouver Downtown Association is a designated Washington Main Street Community. Under the Main Street tax credit incentive program, the Downtown Association is eligible to receive tax credits equal to 75% of private contributions received.[169]
- **Industry Tax Incentives:** Washington State offers tax incentives relevant to Vancouver's identified growth areas, including high tech industries and data centers.[170]
- **International Service District:** Vancouver falls within an International Service District defined by Washington State. Businesses offering specified services to an international market are eligible for a $3,000 annual tax credit per new job created. Eligible services include legal, architectural and financial services.[171]
- **New Market Tax Credits:** The Federal New Market Tax Credit is an often underutilized, but very powerful financing tool. Businesses can obtain benefits including lower interest rates (sometimes below market) on loans, interest-only payments for seven years, non-traditional financing not available in the marketplace, access to a reduced cost of capital, and more. The NMTC is a competitive program administered by the U.S. Department of the Treasury's Community Development Financial Institutions Fund.[172]

CHAPTER SOURCES

144 City of Vancouver Equity Analysis 2023
145 Columbia River Economic Development Council
146 City of Vancouver Equity Analysis 2023
147 City of Vancouver Equity Analysis 2023
148 City of Vancouver Equity Analysis 2023
149 Forbes Cost of Living Calculator
150 Fourth Plain Forward Plan
151 ESRI
152 Census OnTheMap
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155 2017 Census of Agriculture
156 City of Vancouver Community Profile
157 Washington State Employment Security Department, Labor Market and Economic Analysis October 2022
158 Washington State Employment Security Department
159 ESRI
160 Census OnTheMap
161 Washington State Employment Security Department
162 Clark County Economic Development Plan
163 Columbia River Economic Development Council
164 ESRI
165 Washington State University - Vancouver
166 Clark College
167 Columbia River Economic Development Council
168 Department of Revenue Washington State
169 Department of Revenue Washington State
170 Department of Revenue Washington State
171 United States Department of the Treasury Financial Institutions Fund
172 United States Department of the Treasury Financial Institutions Fund

PARKS, RECREATION, OPEN SPACES AND TRAILS



PARKS, RECREATION, OPEN SPACES AND TRAILS OVERVIEW

The Vancouver Department of Parks, Recreation and Cultural Services (VPRCS) oversees and manages a total of 1,700 acres of parkland across 113 sites. The City provides a wide range of park offerings, including everything from competitive sports programs to natural areas.[172]

In 2022, VPRCS published a Park System Comprehensive Plan to analyze existing conditions and identify 10-year goals and metrics. The Comprehensive Plan envisions safe and equitable access to programs and public spaces that cultivate healthy connections between neighbors and nature. To achieve this goal, VPRCS must increase parkland citywide to address gaps in access, meet national standards, and keep pace with population growth.[173]

The quantity and quality of parks, recreational opportunities, open space, and trails have important implications for Vancouver's livability. The VPRCS Comprehensive Plan emphasizes the far-reaching impacts of urban green space on public health, economic development and ecological function by describing parks as "essential spaces."[174]

EXISTING CONDITIONS

A Department of Parks and Recreation for the City of Vancouver was established in in 1955 to oversee about 100 acres of public parkland. Today, there are 3,800 acres of public land in Vancouver, comprising 12% of the City's total land area. The modern Department of Parks and Recreation, VPRCS, manages around 1,700 acres of this as parkland as well as 20 miles of trails. Since 2014, the City of Vancouver has acquired 48.6 acres of public land and developed 12 acres of parkland.[175]

Vancouver is divided into three Park Impact Fee (PIF) Districts, each of which establishes Level of Service (LOS) standards and assesses impact fees on new residential development to offset the cost of meeting the recreational needs of a growing population. The City of Vancouver adopted population-based standards for land acquisition based on park classification in 1994.[176]

Currently, VPRCS operates community gardens at Marshall Community Park, Haagen Community Park, and at Fruit Valley, Landover-Sharmel, First Place, and Bella Vista Neighborhood Parks. These gardens provide the opportunity for community members to rent plots for a season to grow fresh produce and flowers.[177]

Expansion and maintenance of the park system will be essential in the coming years. Residents living east of I-205 have expressed a desire for more parks, while residents living west of I-205 have expressed a need for updated park amenities including benches and trails.[178]

The park system elements that Vancouverites valued most in 2022 were trails and water access. The primary reasons why Vancouverites used parks in 2022 were for exercise and enjoying nature.[179]

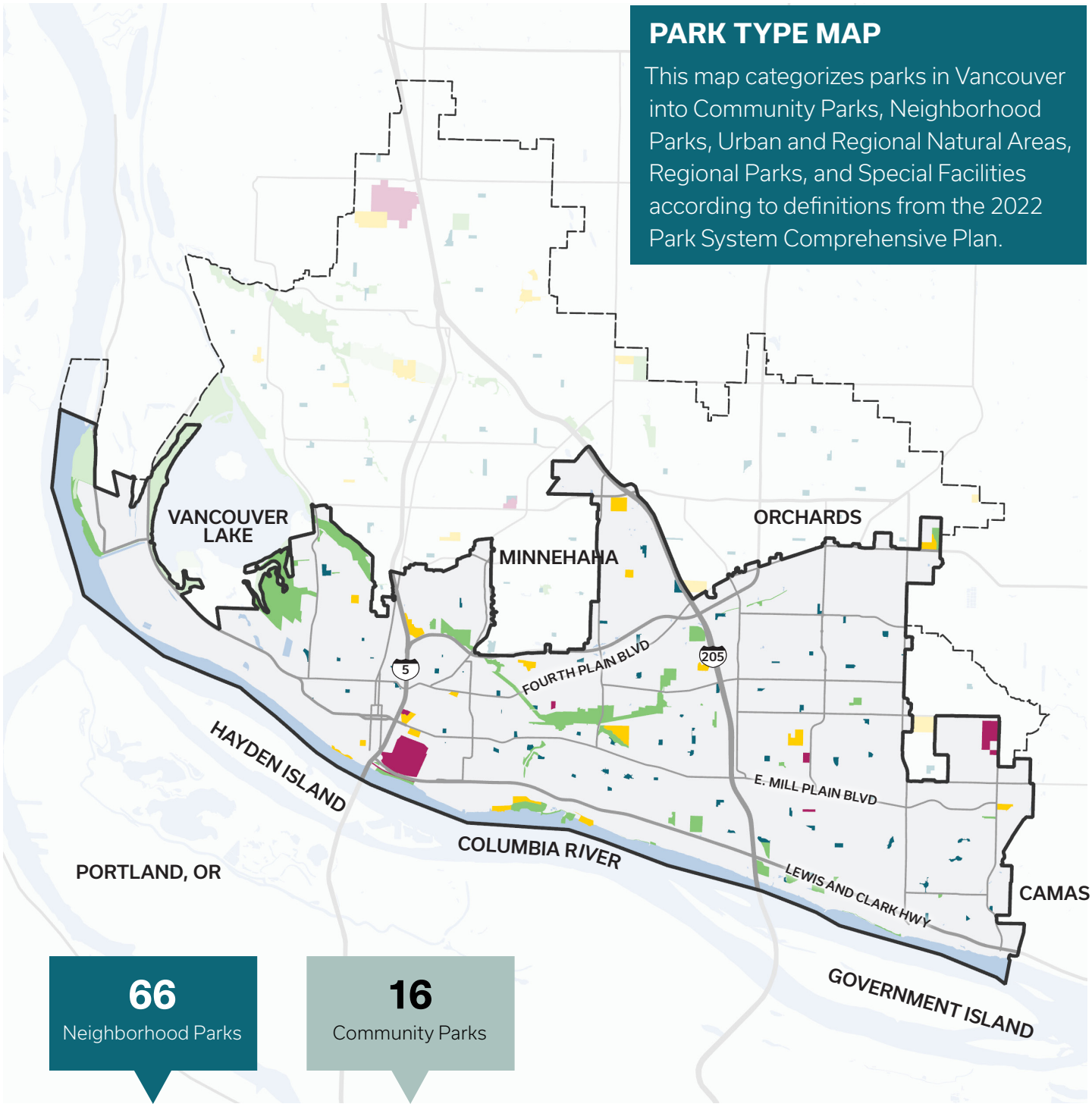

Figure 61: Park Type Map

City Boundary
UGA
Waterbodies

Park Type
Community
Neighborhood
Urban and Regional Natural Area
Regional
Special Facility

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA



Figure 62: Playground



Figure 63: Trail



Figure 64: Columbia River Renaissance Trail



Figure 65: Firstenburg Community Center Pool

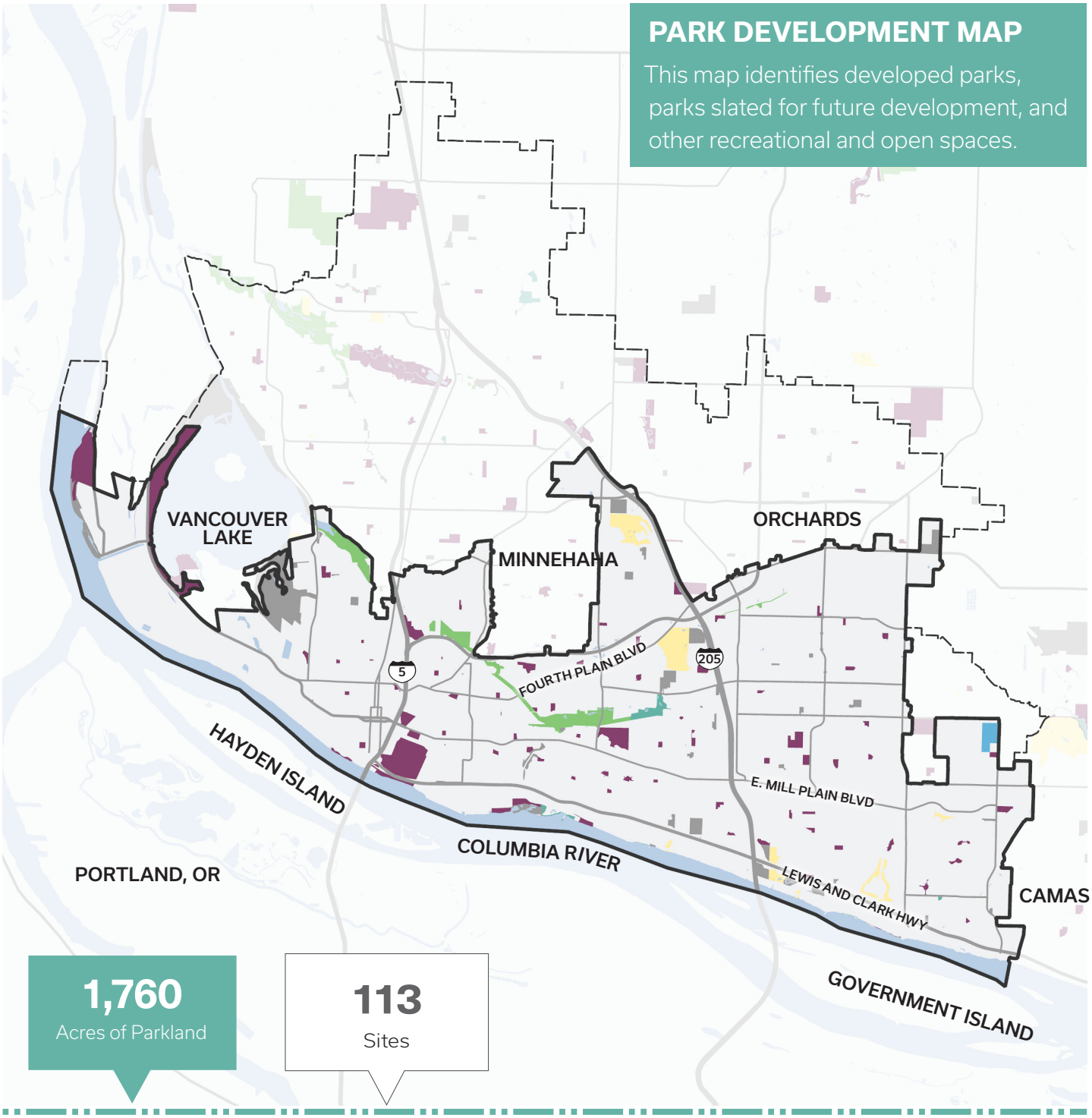

Figure 66: Park Development Map

- City Boundary
- UGA
- Waterbodies

Park Development

- Developed
- Improved Greenspace
- Open Space / Trail Corridor
- Sport Complex
- Undeveloped
- Private

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

CHALLENGES + OPPORTUNITIES

CHALLENGES

The City of Vancouver currently provides 4.46 acres of parkland per 1,000 residents, less than the City's goal of 6 acres and only half of the national median of 10.8 acres. To meet park demand for the projected 2031 population, Vancouver must acquire an additional 568 acres and develop 417 acres of parkland. As population increases it is harder to find land for parks, so the City must take care to ensure that growing high-density areas balance residential development with the required green space.[180]

A ½-mile, or 10-minute walking distance is nationally recognized as the reasonable walking distance to recreational facilities, a standard that was supported by Vancouver Parks Recreation and Cultural Services (VPRCS) Comprehensive Plan survey respondents. Using this standard to assess park LOS indicates service area gaps across the City.[181] The 10-minute walkshed aligns with and is even more ambitious than the 15-minute neighborhood ideal.

Vancouver's park impact fee (PIF) program was established in the mid-1990s to provide a joint funding source for the acquisition and development of urban parkland in the City of Vancouver and Vancouver Urban Growth Area. The current PIF process inherently puts park planning at the end of the development cycle, thus limiting the ability to negotiate the most suitable locations for future parks or to maximize the park service area by incorporating pedestrian interconnections in the project design.[182]

EQUITY ANALYSIS FINDING

Many of the areas with the greatest park need are not experiencing the residential development that generates PIF revenue, and are therefore limited in their capacity to expand or revitalize the park system.

OPPORTUNITIES

The City of Vancouver recognizes that the Columbia River is an essential asset that offers opportunities for recreation, nurtures wildlife, forests and agriculture and supports neighborhoods and businesses. The Vancouver Waterfront Development Project is currently underway, bringing additional housing, office and retail space, dining and entertainment options to the Waterfront. This project compliments other waterfront destinations like the recently completed Vancouver Waterfront Park and the Water Resources Education Center.[183]

Vancouver currently exceeds the standard LOS for urban natural areas. Given this asset, the VPRCS aims to ensure that these spaces are high-quality and distributed equitably as the city's population grows and changes.[184]

Vancouver's trails are an essential component of its park system. The VPRCS plans to pursue an acquisition and development program in cooperation with other concerned agencies to improve the trail network's connectivity.[185]

Parks within Vancouver, overlaid with habitat areas, floodplains and wetlands illustrate what can be considered a green infrastructure network, as illustrated in the Greenspace Map on Page 86.[186]

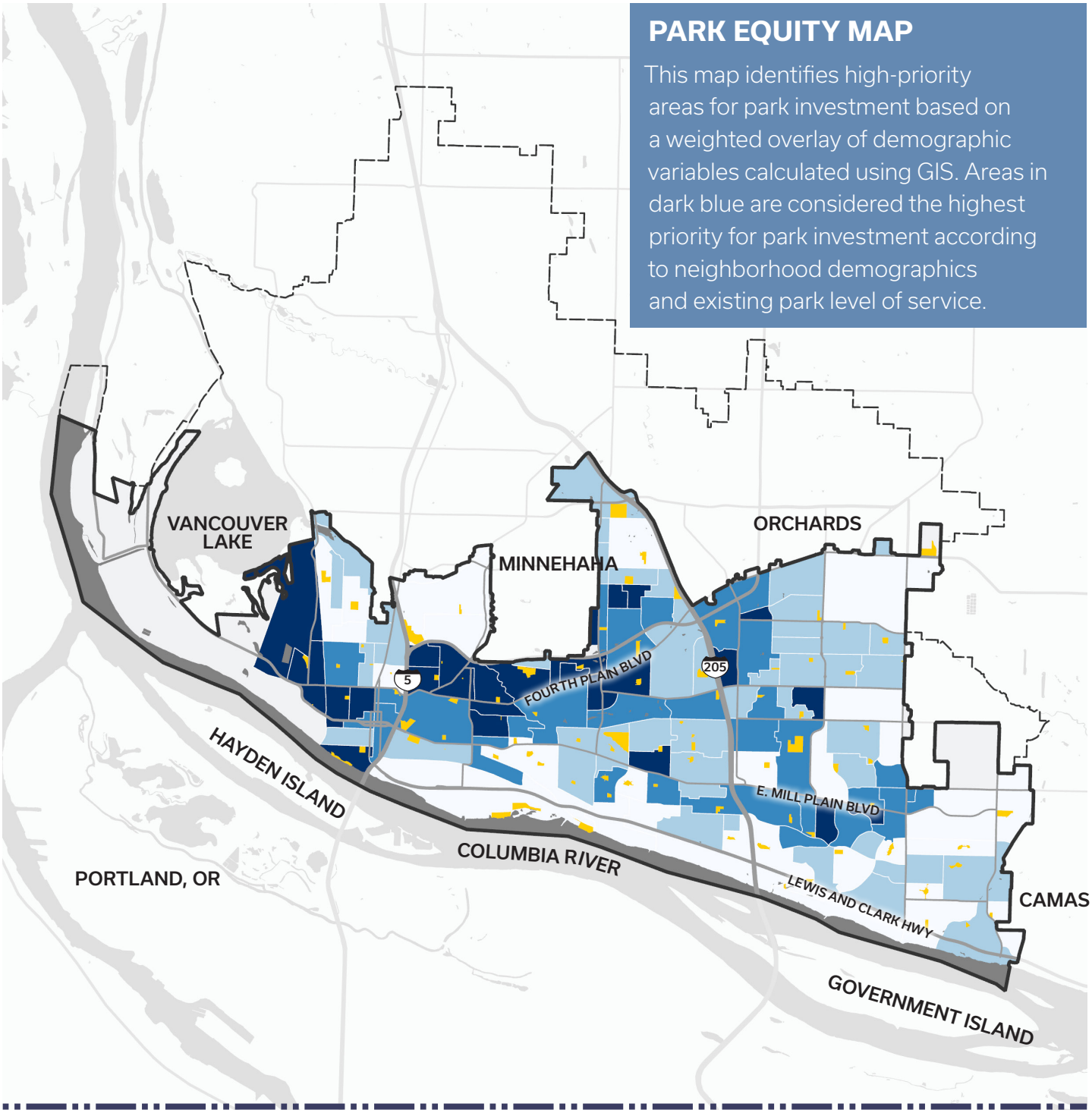

Figure 67: Park Equity Map

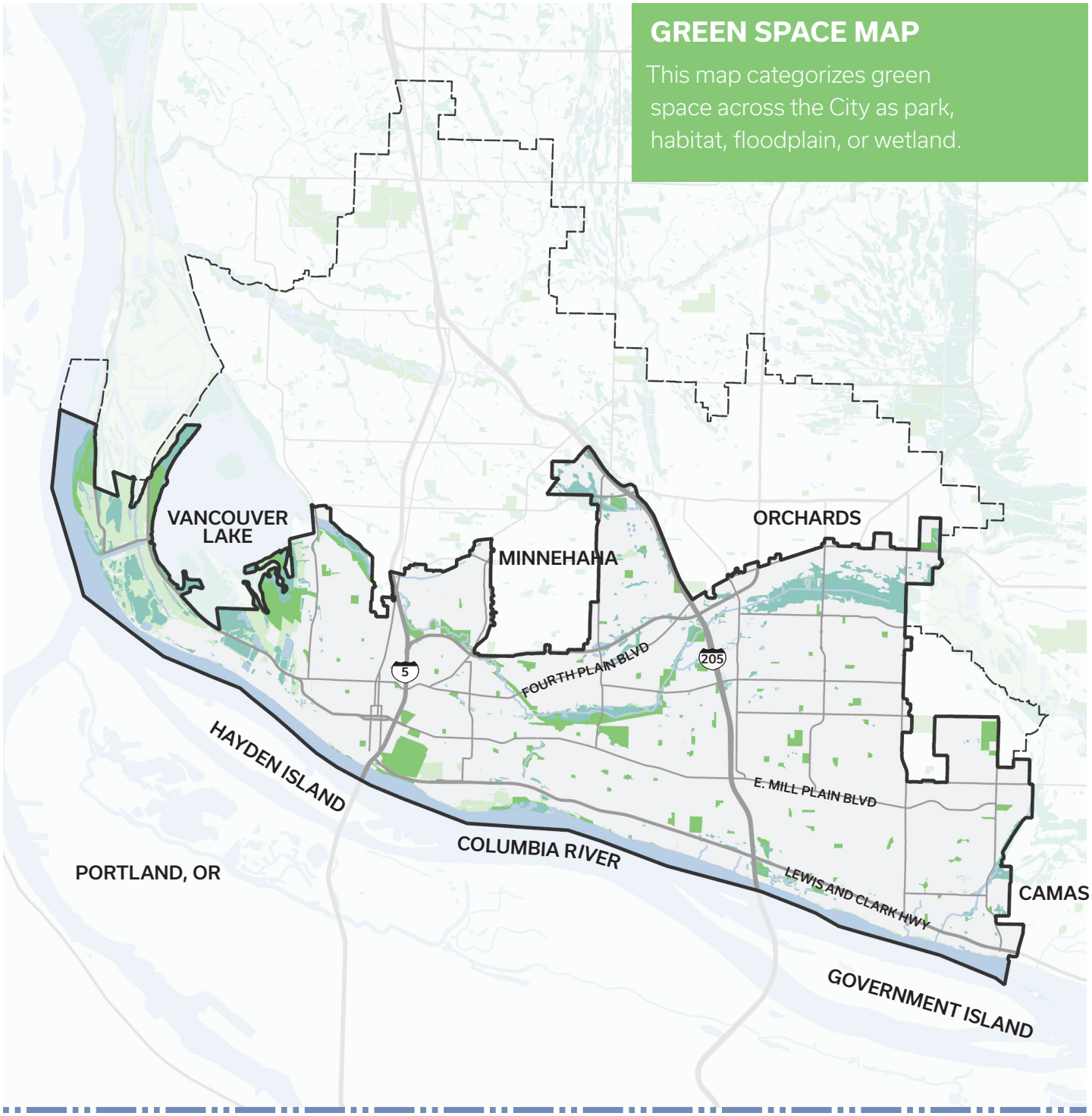

Figure 68: Green Space Map

EQUITABLE ACCESS

ACCESSIBILITY

Universal design defines accessibility above and beyond the requirements of the Americans with Disabilities Act (ADA). Universal park design considers multidimensional barriers to accessibility, including the provision of restrooms, water fountains and parking for individuals with disabilities.[187]

The park system must tailor its communication to an increasingly diverse population. In addition to English, VPRCS Comprehensive Plan outreach was conducted in Spanish, Russian and Vietnamese, and these populations should be considered in future signage and programming. As Vancouver's senior and school-age populations grow, the park system can promote multigenerational play that engages Vancouver's youngest and oldest residents.[188]

Ensuring safe bike and pedestrian access to parks is essential for the 53% of Vancouver residents who walk to their local park. In a survey completed during the VPRCS planning process, 26% of residents note the lack of sidewalks as a safety concern.[189]

WATER ACCESS

Vancouver is bordered by 18 miles of river, but only 5 miles are open for public access, including the Vancouver Waterfront Park and Frenchman's Bar Park. Given the popularity of waterfront amenities in Vancouver, the City should consider opportunities to expand access to the Columbia River in a way that balances human and ecological goals.

Vancouver Lake offers 2.5 miles of shore access, including 35 developed acres where residents can enjoy picnicking, windsurfing and beach volleyball, among other activities.[190]

FUNDING SOURCES[191]

- **American Rescue Plan Act (ARPA):** ARPA funding could be used for community park development to provide an economic stimulus in vulnerable neighborhoods.
- **Conservation Futures:** This property tax, valued at $.0625/$1,000 assessed value, is levied for the purpose of acquiring park land, open space, critical habitat, farm, and timber lands.
- **PIF Rate Update:** As of the Parks, Recreation and Cultural Services Comprehensive Plan's publication, the most recent update to the PIF rate was in 2020. The Plan suggests that PIF rates should be updated based on current land values and park development costs to help Vancouver better reflect the actual costs of acquiring and developing parkland. This could also include funding for linear parks and civic plazas.
- **Regional Park and/or Regional Trail Impact Fee Program:** PIFs are only collected for new residential development within the Vancouver city limits. However, growth both inside and outside the Vancouver UGA affects the need for regional parks, trails and special facilities. Additional revenue could be collected for regional facilities by charging a regional PIF for all development in the County, including non-residenital development and development within the incorporated cities.
- **Stronger Vancouver Initiative:** As of March 2021, City Council had established their intention to revisit the Stronger Vancouver Initiative, which was initially proposed in 2017. Stronger Vancouver proposes adjustments to existing funding sources including PIFs, business licenses and utility taxes to prepare for the needs of a growing, urbanizing community.

PARK / SIDEWALK INTERFACE MAP

This map overlays parks with the sidewalk network to identify parks that are well-served or not well-served by the City's pedestrian infrastructure. The City has existing sidewalk gaps spread across the three geographies, west, central and east which will need to be assessed through the update to the Comprehensive Plan and Title 20 Update.

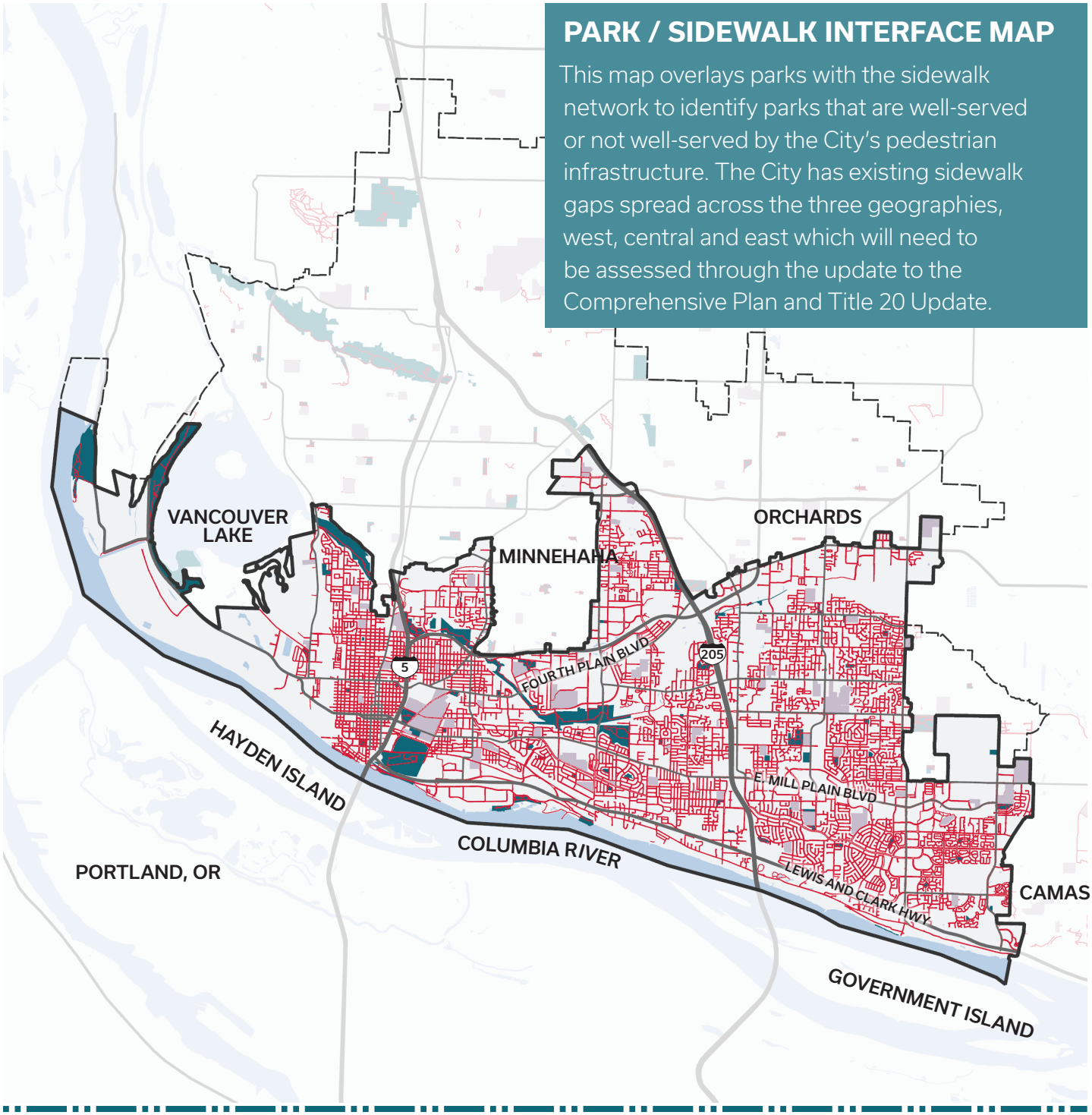

Figure 69: Park / Sidewalk Interface Map

City Boundary
UGA
Waterbodies
Existing Park, Open Space and Trail Corridor
Sidewalk and Trails

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA



Figure 70: Sidewalk Infrastructure

CHAPTER SOURCES

172 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031
173 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031
174 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031
175 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031
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177 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031
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188 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031
189 Vancouver Parks, Recreation and Cultural Services Comprehensive Plan, 2022-2031

PUBLIC FACILITIES



PUBLIC FACILITIES OVERVIEW

Essential services play a crucial role in maintaining the functionality and well-being of the City. These services are integral to employing policies that promote and support the 15-minute neighborhood concept. Today, the City's essential services are located primarily along the Mill Plain, Fourth Plain, and 164th Avenue corridors as well as in downtown. Vancouver has identified these essential services fall under the following categories (using The North American Industry Classification System (NAICS) 3-digit code, or subsector): ambulatory healthcare services, building material or garden equipment and supplies dealer, credit intermediation and related activities, educational services, food and beverage store, general merchandise store, health and personal care store, hospital, personal laundry service, religious, grantmaking, civic, professional or similar organization, and social assistance. These essential services are vital for the proper functioning of the City and ensuring the well-being of its residents.

The City of Vancouver itself is responsible for providing administration and support facilities to facilitate the smooth operation of essential services. Services managed by the City of Vancouver include the Fort Vancouver Regional Library System, which offers access to a wide range of books, resources, and community programming. Clark County contributes to essential services in Vancouver through the provision of law enforcement and emergency response support services.

These essential services, along with the support facilities and resources provided by the City of Vancouver and Clark County, are key components of the City's infrastructure. They ensure that residents have access to critical services, promote community well-being, and support the overall functionality and livability of Vancouver.



Figure 71: Police Precinct

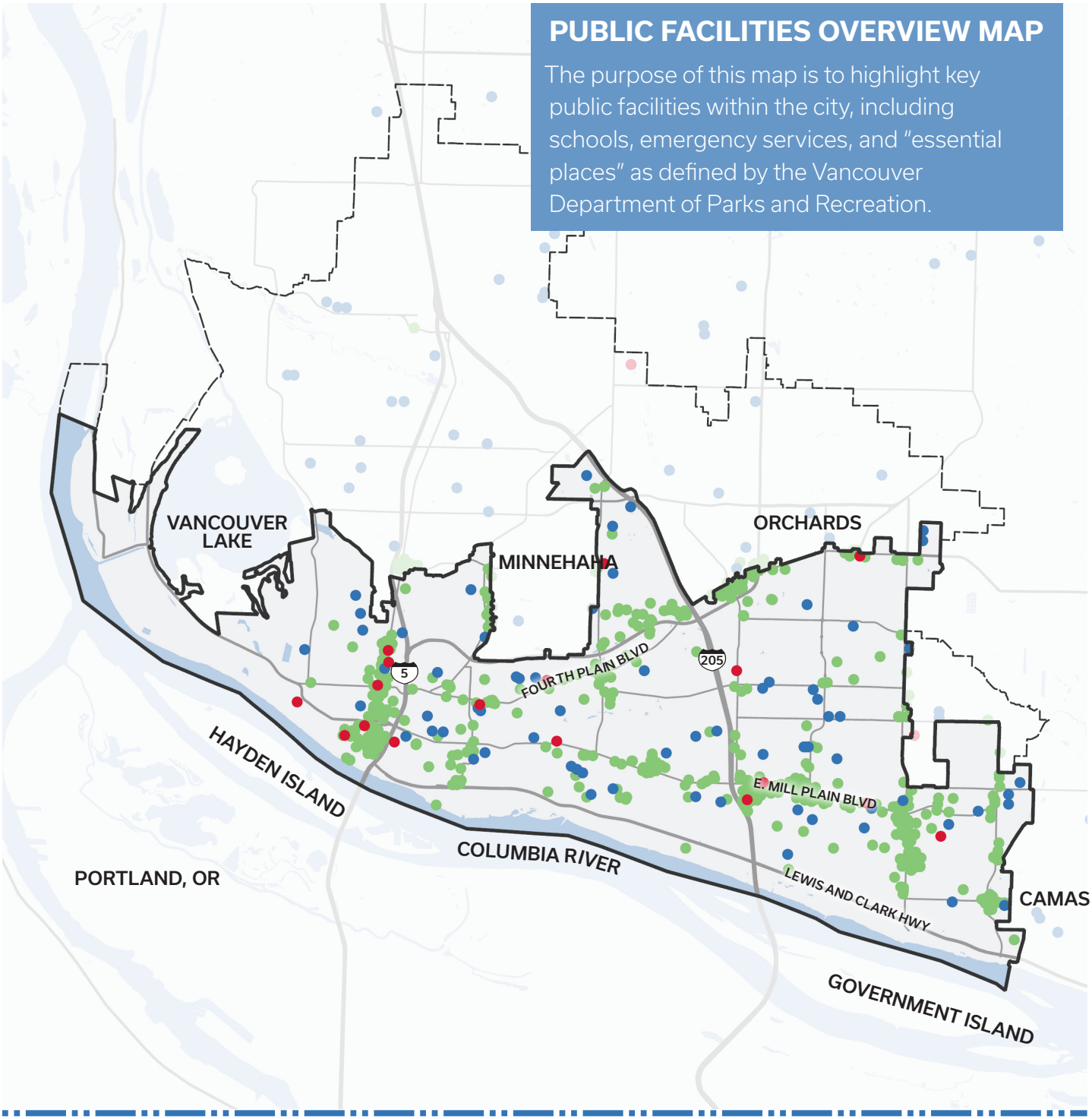


Figure 72: Public Facilities Overview Map

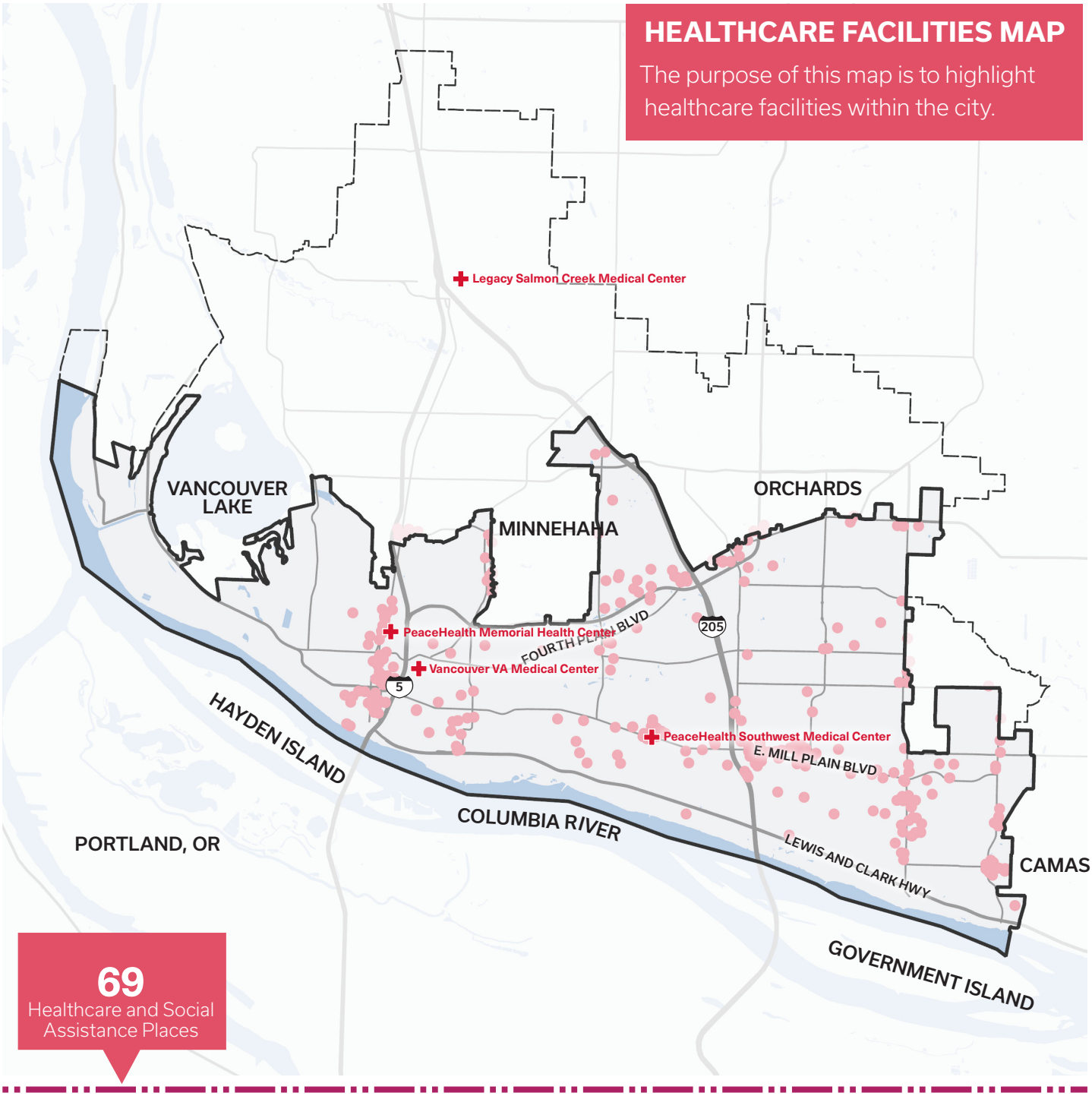


Figure 73: Healthcare Facilities Map

City Boundary
UGA
Waterbodies
Healthcare and Social Assistance
Hospital

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

HEALTHCARE

Vancouver's health system is robust, with healthcare and social assistance services located throughout the City. Health services are clustered around the 3 medical centers and the major corridors.

PeaceHealth Southwest Medical Center is the largest hospital in the City, with 450 beds as of 2012. The hospital serves the Columbia-Willamette area of Oregon and Washington, with Clark County being its primary service area. The Emergency Department had 76,244 visits between July 2021 and June 2022. The hospital also features major medical services such as advanced heart and vascular care, a level II trauma center, centers dedicated to the treatment of brain, spine, and other traumas, a certified stroke center, a Kearney Breast Center, advanced imaging services, 3D mammography, joint replacement, neurosciences, and cancer care.[191]

Administratively, PeaceHealth has been recognized as a leader in information technology integration in clinical care. Academically, the hospital has been operating a family medicine residency through the University of Washington since 1995. Environmentally, the hospital established an environmental sustainability program in 2020 and has since won the Practice GreenHealth Environmental Excellence award and Clark County Business of the Year.[192]

The Vancouver VA Medical Center is an integral part of of the Veterans Health Administration (VHA) in Southwest Washington. This center offers primary care, mental health and specialty health services however, they currently do not offer emergency services. Specialty health services offered included PTSD care, audiology, community living center (CLC), transitional lodging, and prosthetics.[193]

Legacy Salmon Creek Medical Center is located within the Vancouver Urban Growth Area (UGA). Legacy Salmon Creek is an acute care hospital with 147 beds, as part of Legacy Health, a nonprofit organization based in Portland, OR. It opened in 2005 and was the first hospital built in Washington state in 20 years. Notable services offered are the Legacy Cancer Institute, neonatal intensive care unit, birthing center, orthopedics, surgery center, breast health center, and surgical care.[194]

Vancouver's health system plays an integral role in the Southwestern Washington regional health system and the larger Portland Metropolitan Area. The presence of these medical facilities, and other facilities focused on serving low-income, uninsured populations such as Sea Mar and the Free Clinic, ensure that residents have access to comprehensive healthcare services and specialized treatments, contributing to the community's overall health and wellbeing.



Figure 74: PeaceHealth Southwest Hospital

EMERGENCY SERVICES

Emergency services are organizations that ensure public safety and health by providing services that are fast and effective. The 3 primary forms of emergency services are Fire, Medical, and Police. Each is essential to the function of a city and is essential to the safety of the public.

FIRE DEPARTMENT

The Vancouver Fire Department (VFD) provides fire protection and emergency medical services (EMS) to the City and Clark County (Fire District 5). They protect 288,000 people covering 89.2 square miles. In addition to fire and EMS, they provide marine response, fire prevention, and fire investigation. Regionally, they provide hazardous materials and technical rescue responses.[195]

Today the VFD has 11 stations, operated by 182 VFD and 142 American Medical Response (ARM) personnel. They have a diverse offering of vehicles including 10 fire engines, mobile water tenders, brush units, ladder trucks, command units, rescue units, medical rehab units, mobile air compressors, fire boats, heavy rescue units, hazardous material units, high-capacity pump and foam tender, and a fire investigation unit. Vancouver has a long history of being a highly trained and efficient, all-hazard firefighting force with 1,302 fire suppression responses in 2021. They also responded to 4 technical rescues and 193 hazmat situations.[196]

POLICE DEPARTMENT

The Vancouver Police Department (VPD) and the Clark County Sheriff's Department provide police services in the City. The VPD has 2 precincts and employs 211 sworn members, 84% of whom have had 40 hours of Crisis Intervention Training (CIT). All officers receive the training required under the Washington Administrative Code and the Revised Code of Washington. The 720-hour basic law enforcement academy in Burien, WA covers topics such as criminal law and procedures, traffic enforcement, cultural awareness, communication skills, emergency vehicle use, firearms, crisis intervention, patrol procedures, criminal investigation, and defense tactics. Overall, Vancouver suffers from more property and violent crime than the national average. In 2018, Vancouver's crime rate was 461 per 100,000 people. This is more than the States average of 311, but less than its neighbor Portland, with 520. Notably, motor vehicle thefts reached 641.5 per 100,000 people compared to the national average of 284. From 2013 to 2021, 35,478 arrests were made, 59% of which were low-level, non-violent offenses. VPD's police budget per person falls within the 86th percentile of comparable cities. Their police presence is strong, falling in the 73rd percentile of comparable cities.[197]

EMERGENCY MANAGEMENT PROGRAM

The City of Vancouver has an Emergency Management Program that serves as a framework for hazards experienced daily and for catastrophic events such as an earthquake along the Cascadia Subduction Zone. This program focuses on the distinct phases of emergency management which include mitigation, preparedness, response, and recovery. This, along with the VFD and VPD, form the emergency services system in Vancouver. This system is integral to Vancouver and the entire southwest region of Washington.[198]

EMERGENCY SERVICES

11	FIRE STATIONS
182	VANCOUVER FIRE DEPARTMENT PERSONNEL
2	VANCOUVER POLICE DEPARTMENT PRECINCTS
211	SWORN VANCOUVER POLICE OFFICERS
142	AMERICAN MEDICAL RESPONSE PERSONNEL

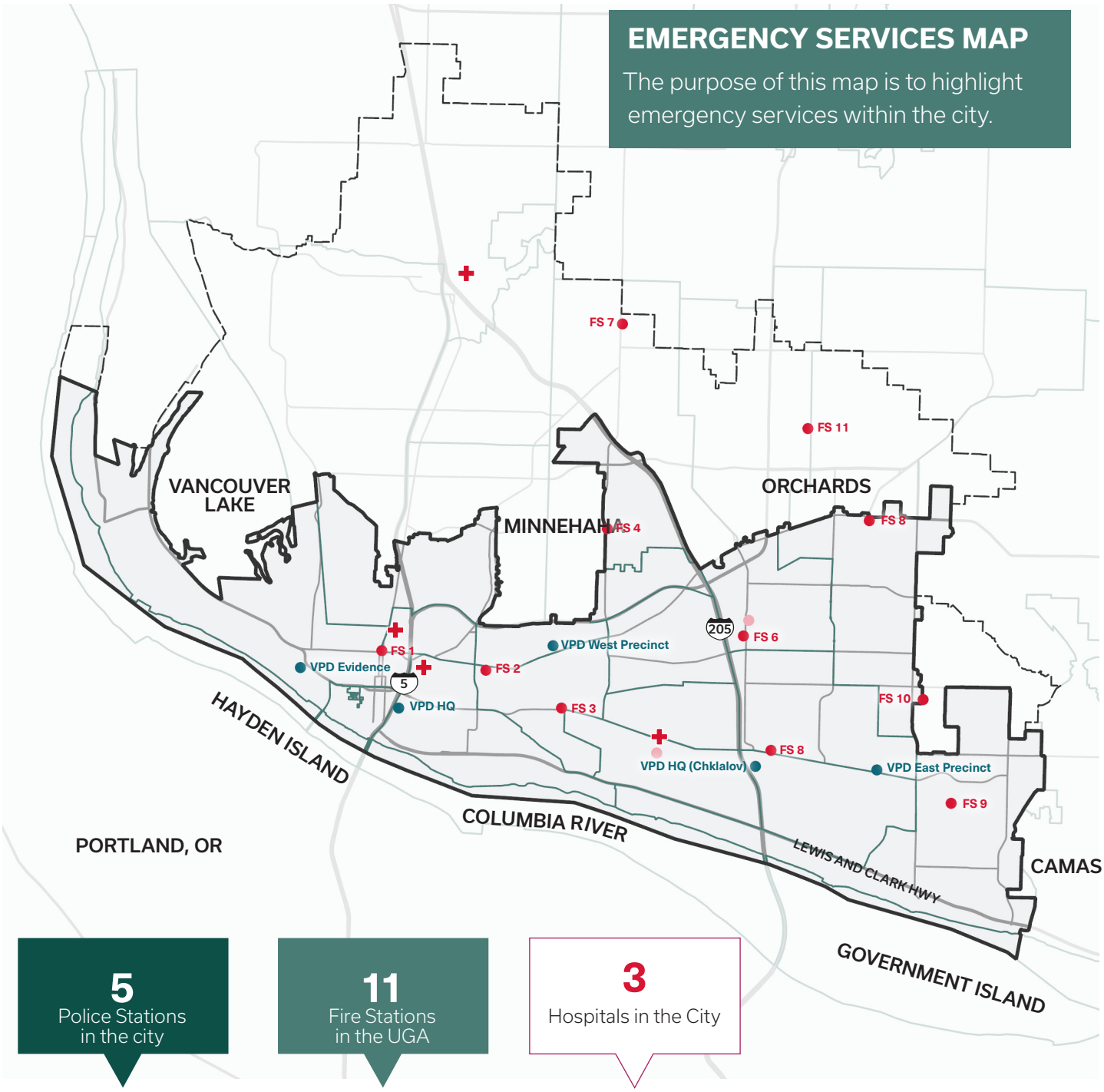


Figure 75: Emergency Services Map

City Boundary
UGA
Waterbodies

Fire Department
Station
Future Station

Police Department
Police Station
Beat Area

Hospital

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

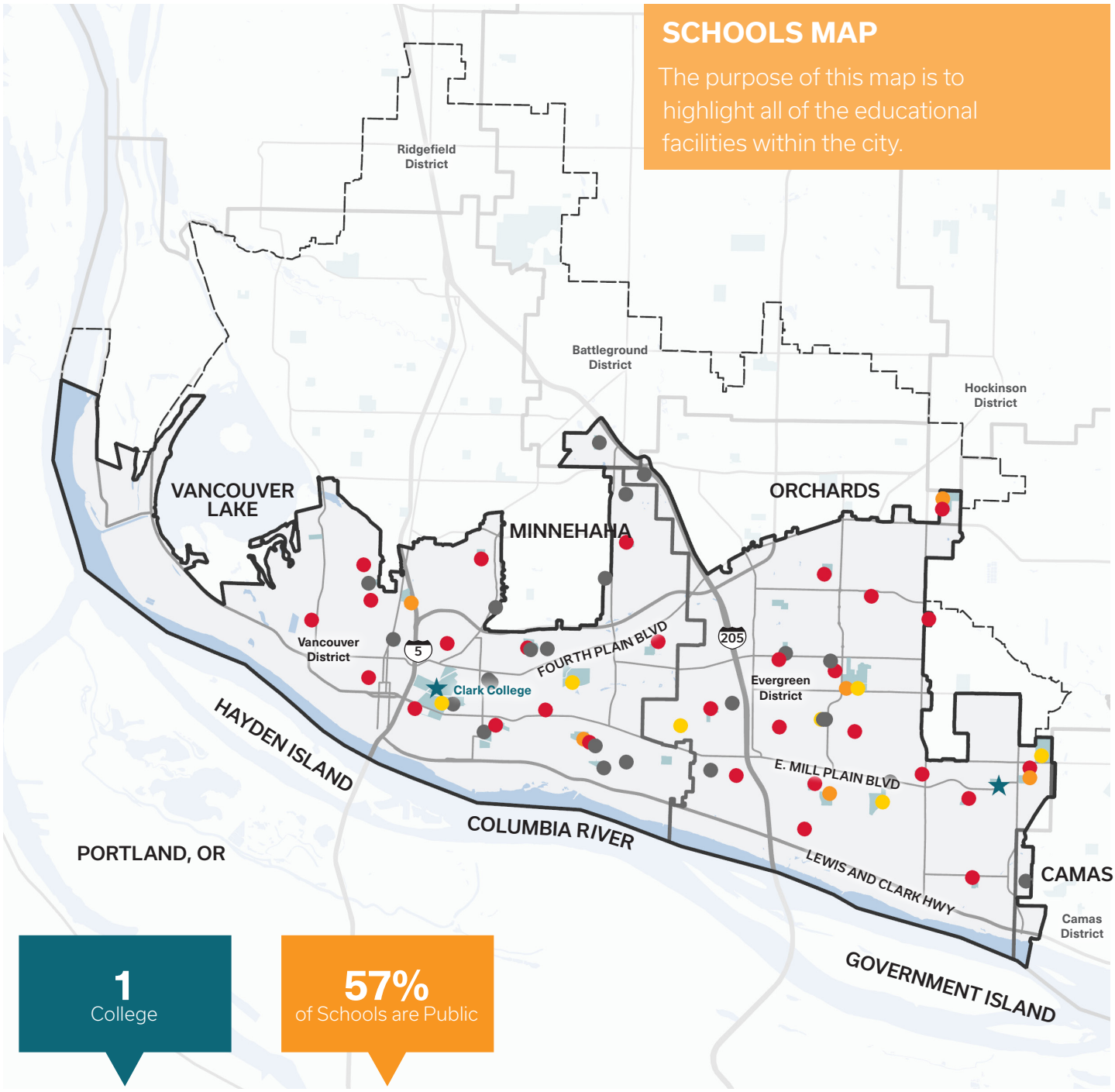


Figure 76: Schools Map

City Boundary
UGA
Waterbodies
School Parcels
College
Private and Special

Public School Type
Elementary
Middle
High

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

SCHOOL DISTRICTS

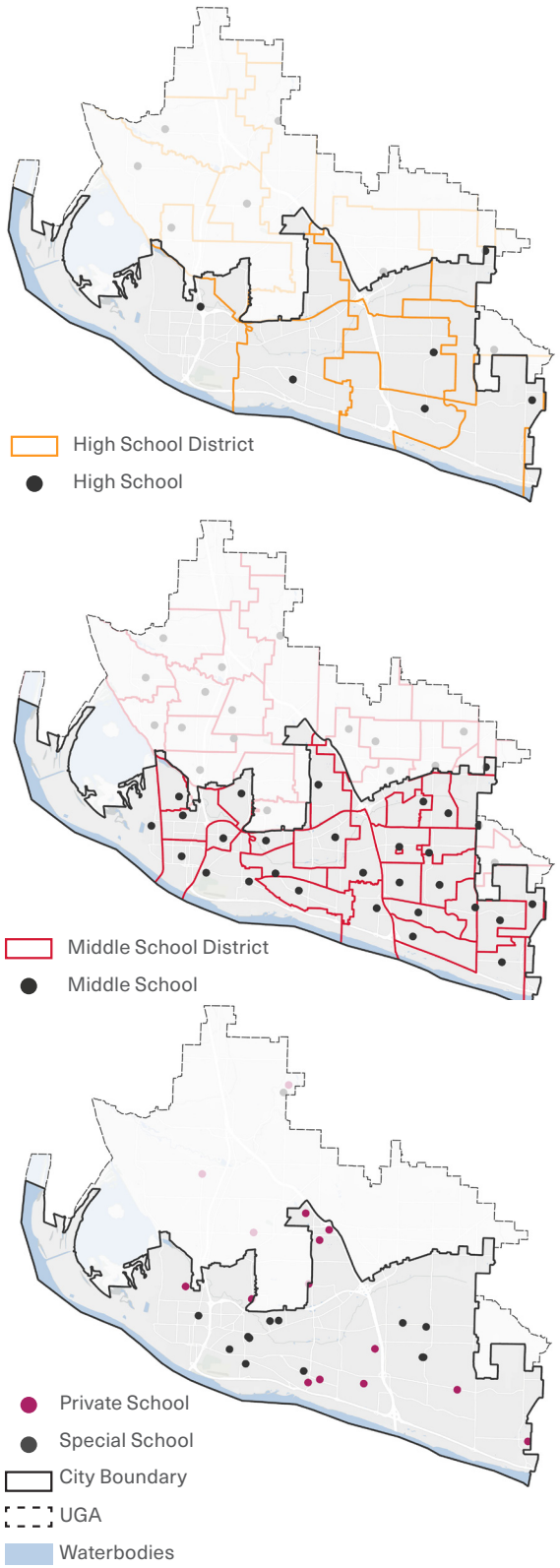


Figure 77: Schools Districts and Maps

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

The Vancouver school system is a mix of public, charter, private, and special schools. There are 2 regional public school districts in Vancouver, WA: the Vancouver Public School (VPS)District and the Evergreen School District. The City also is home to the Washington School for the Deaf, and the Washing School for the Blind.

VPS is the primary provider of public education in the City. The school district consists of 21 elementary, 6 middle, and 5 high schools covering a district of 58 square miles. The average student-teacher ratio is 17:1, which is less than the state average of 19.7:1. The school district is above average in the state, with an 89% graduation rate. The Vancouver School of Arts and Academics, a public magnet school within the district, ranks as the 13th best high school in the state of Washington. Within the VPS District, 45.7% of the student population is a minority and the student body speaks 100 different languages. VPS has 3,300 employees, 1,404 of whom are classroom teachers. Teachers, on average, have 12.1 years of experience. The City has a 5-member elected school board serving a 4-year term.[199]

The Evergreen School District serves Clark County and the eastern part of Vancouver and consists of 22 elementary, 6 middle, and 6 high schools. It also includes 4 specialty schools.[200]

The educational system in Vancouver also includes Clark College, a community college offering over 100 options including bachelor, associate's, and certificates. Clark College's history in the community runs deep: founded in 1933, it is the oldest institution of higher education in southwest Washington. Their offerings include a "transitional studies program" which includes a high school diploma, English as a second language, and skills and training programs. They also host many annual events such as Jazz Fest and Sakura Festival, celebrating 100 Shirofugen cherry trees gifted and planted at Clark College 25 years ago.[201]

The Camas, Battle Ground, Ridgefield, and Hockinson School Districts are located within the surrounding unincorporated urban area. Overall, Vancouver boasts a robust school system with offerings from K-12 and beyond throughout the City.[202]

UTILITIES

POTABLE WATER

The potable water system in Vancouver, Washington is managed by the City of Vancouver and serves the City as well as the northern portion of the Vancouver UGA.

Water pressure requirements for the system are determined by the Washington Department of Health, which establishes pressure standards of 30 pounds per square inch (psi).[203] These standards ensure that adequate water flow is maintained during peak hours when there is high demand. Compliance with these pressure standards is crucial for providing a reliable water supply to the residents.

The National Fire Protection Association (NFPA) also plays a role in ensuring the effectiveness of the water system, particularly in the event of a fire. The NFPA sets guidelines and regulations for the supply, storage, and distribution of water to meet the firefighting needs of the community. Fire flow requirements often determine the minimum size of water lines to ensure an adequate water supply is available for firefighting purposes.[204]

One geographical challenge faced by the water system in Vancouver is the disconnect between the location of the water reservoirs in the southwest and the areas experiencing population growth in the northeast. To maintain the flow of water and meet the increasing demands, the City needs to continuously improve its transmission infrastructure and pumping systems.



Figure 78: Vancouver Lake

Considering the future, the City of Vancouver may need to explore alternative water sources. The Salmon-Washougal and Lewis Watershed Management Plan, published in 2006, recommended sourcing water from the Columbia River instead of relying on flow-limited streams and sensitive aquatic habitats. This suggests that water bodies such as the Vancouver Lake lowlands and the Steigerwald Wildlife Refuge should be protected to ensure their viability as potential water sources.[205]

Overall, the City of Vancouver is responsible for managing the potable water system and must comply with pressure standards set by the Washington Department of Health while also meeting the fire flow requirements outlined by the NFPA. Addressing the geographical challenges and considering alternative water sources are important factors in ensuring a sustainable and reliable water supply for the growing population in the City.

SOLID WASTE + COMPOSTING

The City of Vancouver's Solid Waste Services fall under the purview of the Public Works Department which oversees garbage, recycling and organics collection. The City offers a variety of waste and recycling resources to residents including information on hazardous waste removal, recyclables, and composting. The City also offers organics pick up for residents and businesses to help reduce the amount of organic materials going to landfill. This is in alignment with the State of Washington's Organics Management Law which is intended to divert 75% of previously disposed organic materials from the landfill by 2030, and rescue 20% of previously disposed edible food for human consumption by 2025.[206]

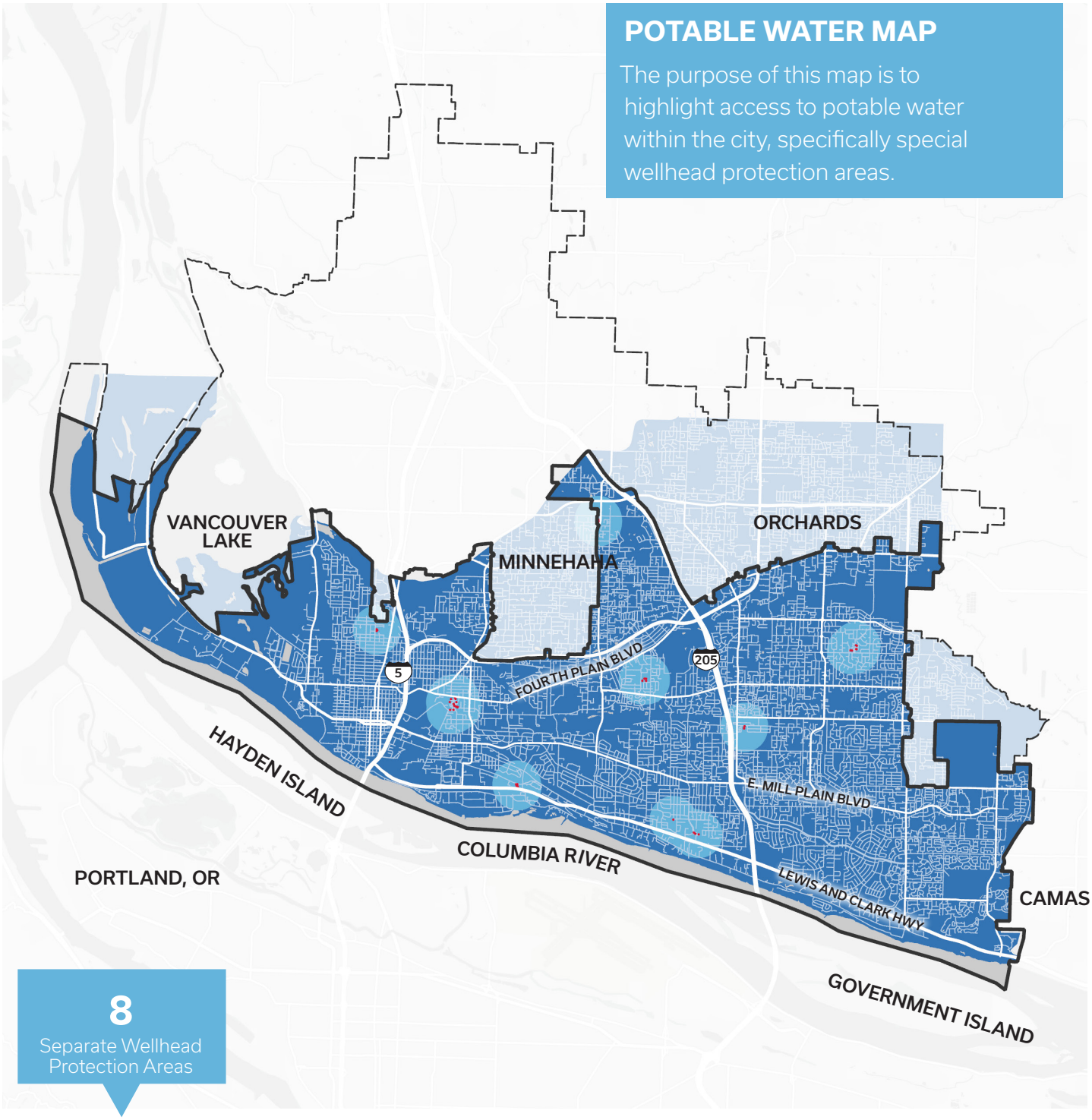


Figure 79: Potable Water Map

City Boundary
UGA
Waterbodies
Water Service Area
Water Main
Wellhead Protection Area
Water Well Protection Area (100')
Special Wellhead Protection Area (1900')

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

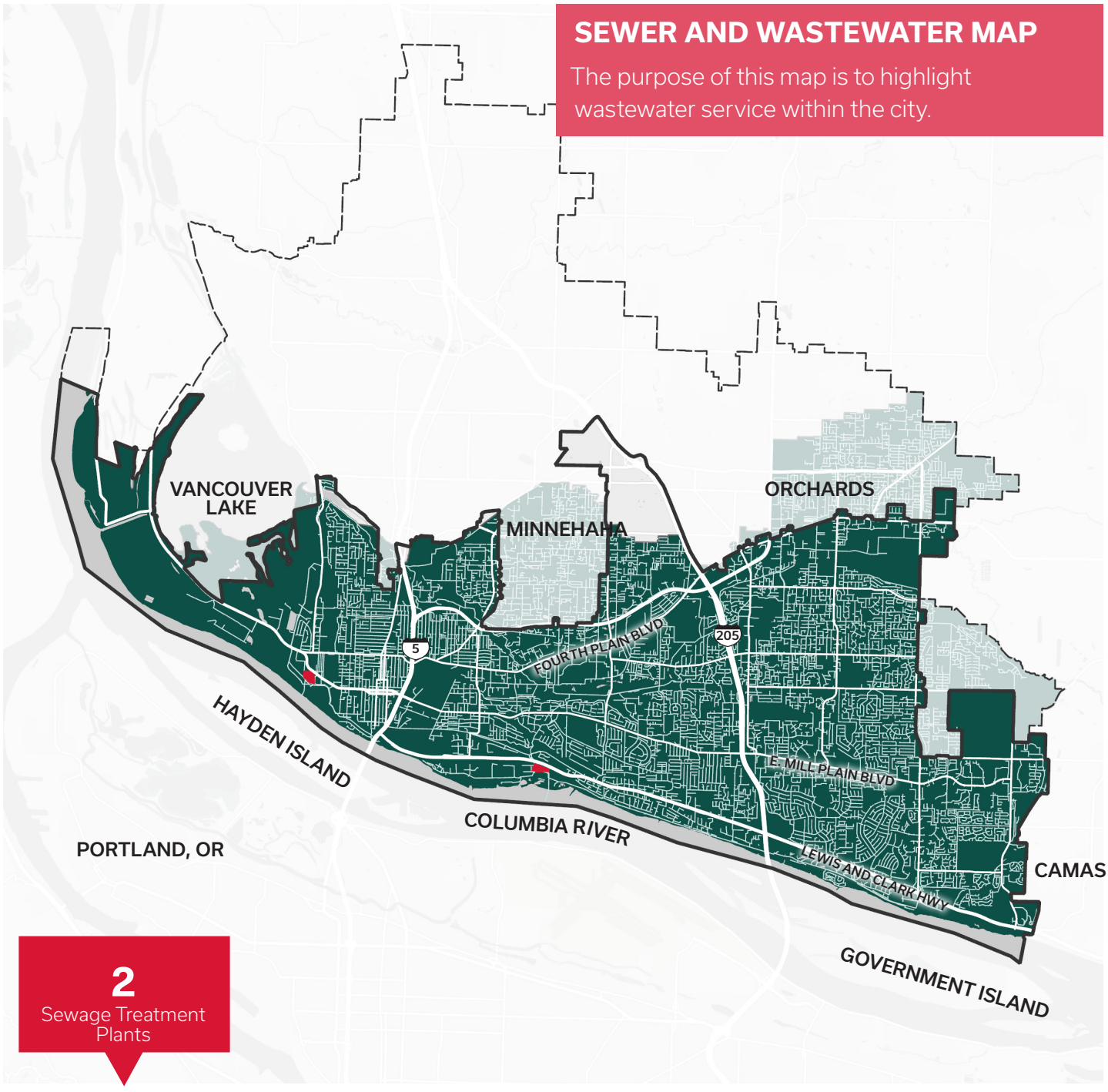


Figure 80: Sewer and Wastewater Map

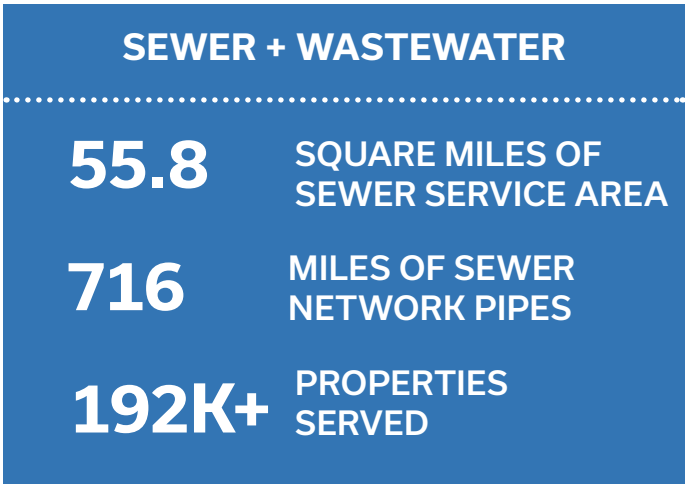
City Boundary
UGA
Waterbodies
Wastewater Service Area
Sewer Main
Sewer Treatment Plant

0 0.5 1 2
miles

County of Clark, WA, Oregon Metro, Oregon state, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

SEWER + WASTEWATER

Sanitary sewer is provided by the City of Vancouver within the City limits as well as the northern unincorporated area. As of 2011, they served 192,000 residents covering 55.8 sq. miles. The sewer system is an extensive network spanning 716 miles of pipe. These pipes transport residential, commercial, and industrial wastewater to two treatment plants: Westside Water Reclamation Facility (WWRF) and Marine Park Water Reclamation Facility (MPWRF).[207] Both of these have been recognized for environmental excellence employing advanced processes to treat wastewater and remove pollutants before releasing it into the Columbia River. From there, sterilized ash from incinerated solids is trucked to a landfill in Boardman, OR.



There are various federal and state standards to ensure the system meets former and future demands. These standards encompass factors such as water quality, environmental protection, and public health. The City of Vancouver adheres to these standards to ensure the proper functioning and compliance of the wastewater system.[208]

Overall, the wastewater system in Vancouver is a comprehensive and well-managed system that plays a crucial role in safeguarding public health, protecting the environment, and meeting the wastewater treatment needs of the community.

CHAPTER SOURCES

191PeaceHealth Southwest Medical Center, Clark County Fact Sheet
192 Green Biz Clark County, Green Business Spotlight: PeaceHealth Southwest Medical Center
193 Vancouver VA Medical Center
194 The Columbian
195 VFD Annual Report 2023
196 VFD Annual Report 2023
197 Police Scorecard: Vancouver, WA
198 City of Vancouver Emergency Management
199 Vancouver Public Schools
200 Vancouver Public Schools
201 Clark College
202 National Center for Education Statistics
203 City of Vancouver Public Works
204 Vancouver Municipal Code
205 Washington State Department of Ecology
206 Washington State Department of Ecology
207 City of Vancouver Public Works
208 City of Vancouver Public Works

REGULATORY FRAMEWORK

REGULATIONS OVERVIEW

The Comprehensive Plan and Title 20 Code Update is an opportunity for the City of Vancouver to assess historical planning context, past actions, existing Comprehensive Plan policies, existing Clark County planning policies, State of Washington Growth Management Act policies, and other supporting guiding documents in order to not only understand how these documents have contributed to existing conditions but how they can inform the development of updated and new land use and built environment policies.

HISTORICAL DEVELOPMENT CONTEXT AND PAST ACTIONS

The Equity Framework, as part of the Comprehensive Plan and Title 20 Code Update, defines what equity means for the Vancouver community and outlines a framework and guiding principles. It includes an analysis of the demographics profile of City residents focusing on vulnerable and historically marginalized communities.

The Equity Framework includes an expansive narrative on past actions that have led to communities in Vancouver being marginalized and vulnerable to displacement and policy changes. A full summary of these actions, including citations, can be found in the Equity Framework document available on the City's community engagement website Be Heard Vancouver (www.beheardvancouver.org). A condensed version can be found below:

1800S: EARLY SETTLEMENTS AND THE HUDSON'S BAY COMPANY

During the inception of The Hudson's Bay Company and the early non-native settlements, the trading operations comprised a diverse array of residents. Higher-ups often lived within the Fort, while lower level employees lived outside.

As the fur industry flourished in Fort Vancouver, numerous native Hawaiians migrated to Vancouver. They were brought by fur trading ships that voyaged from China and made a stop in Hawaii, seeking employment opportunities.

In 1844, the initial American settlers relocated their activities to the British territory further north, leading to significant changes in the region.

With the establishment of their own barracks, the United States brought in several new military officers who, in turn, brought along their "personal servants" who were essentially akin to slaves.

As the United States experienced growth and sought labor, various groups of Chinese immigrants were employed for work in and around Vancouver throughout the 1880s and 1890s.

In 1899, the U.S. 24th Infantry witnessed the arrival of 103 buffalo soldiers, segregated black cavalry troops. These troops were met with considerable animosity from the white community in Vancouver and the white troops replaced the black cavalry troops in leadership roles.

LATE 19TH CENTURY - EARLY 20TH CENTURY

With significant advancements occurring prior to World War I and transformations in Vancouver's agricultural land, railroad, and logging sectors, the city experienced substantial growth. By around 1920, the white population comprised the majority, totaling approximately 12,600 residents. Nonetheless, census records indicate the presence of a small percentage of African American, Native American, Chinese, and Japanese individuals.

During the 1920's, the Ku Klux Klan held a prominent position throughout the country and made an appereance in Vancouver on March 11, 1921. The largest rally in the northwest, consisting of 500 Klansmen and 10,000 spectators, took place in Vancouver's Bagley Downs in 1924. This event engendered significant tensions and instilled fear among Vancouver's minority groups.

From the 1920s to the 1940s, numerous laws were enacted to restrict and discourage

communities of color based on their race, color, or religion. These laws primarily stemmed from urban development, as communities across Washington adopted deed restrictions to enforce racial segregation, preventing non-white families from selling, leasing, or renting properties in certain neighborhoods.

To date, no study has specifically examined the racial restrictive covenants in Vancouver. However, the University of Washington and Eastern Washington University have identified around 40,000 restricted properties within five Washington counties through their research efforts.

Developers in Vancouver implemented financial restrictions on plats to hinder the development of affordable housing. Advertisements explicitly prohibited housing costing less than $1,000, as it was deemed to "disfigure" the development

JAPANESE-AMERICAN COMMUNITIES: CONTRIBUTIONS & DISPLACEMENTS

After the Chinese Exclusion Act halted Chinese immigration in 1882, American industrialists shifted their focus to the Japanese population as a source of inexpensive labor, particularly in the railroad industry. However, Japanese immigrants still faced exclusion under "Alien Land Laws."

In 1889, the Washington State Constitution prohibited non-citizens (aliens) from owning land. This restriction applied to Asian immigrants, even if they were seeking U.S. citizenship. The U.S. Congress also banned Asian immigrants from attaining citizenship under any circumstances.

In 1921, the Hood River Anti Alien Association successfully lobbied the state to pass an Alien Land Law. This law stripped non-citizens of their rights to rent or lease land. The Japanese immigrant community, known as the Nikkei community, played a significant role in Vancouver's truck farms, operations dedicated to growing produce for sale at local markets and restaurants, located in Clark County. President Roosevelt issued Executive Order 9066, which resulted in the forced relocation of 120,000 Japanese and Japanese Americans to concentration camps.

The Italian, German, and Japanese communities were prohibited from residing in southern and western Clark County and were forcibly removed from their homes and compelled to repurchase their land once the war concluded.

1939-1945: WORLD WAR II

In December 1943, the population increased to approximately 83,000, including a growth in the African American population to 8,825. Both white and black populations were recruited for labor in the shipyard due to operational needs. However, only a small portion of the 1.5 million African Americans who left the South in the 1940s migrated to the North and West for employment.

Moving to the Pacific Northwest brought significant cultural changes for many families, who also had to endure legally enforced segregation and racist systems in education, employment, and housing.

As Vancouver experienced rapid population growth and infrastructure development, the Vancouver Housing Authority (VHA) was established in 1942 to accommodate this expansion. It is believed that although the VHA did not have written policies promoting segregation, black and white populations ended up living separately within the housing developments based upon the states they came from.

Facing housing discrimination, the formation of NAACP Branch #1139 in Vancouver aimed to advocate for desegregation, equal employment opportunities, and education for black residents. The NAACP collaborated with local leaders on the issue of housing segregation to ensure permanent housing options were available for African Americans.

1945-1958: THE END OF WORLD WAR II

As World War 2 neared its conclusion, approximately 30,000 workers faced layoffs

as various industries scaled back. Discussions arose regarding the temporary housing projects undertaken by the Vancouver Housing Authority (VHA) and the potential impact on the city due to expanding public housing for white residents.

In 1958, the city of Vancouver decided to demolish the temporary housing designated for wartime efforts and transformed these developments into privately-owned subdivisions.

In 1952, the city established the Mayor's Commission on Open Housing, collaborating with the NAACP to create non-discriminatory housing opportunities that addressed concerns raised by city residents.

In January 1958, Vancouver became the first city to obtain special mortgage insurance to finance 150 units of affordable private housing.

Despite efforts to protect underprivileged communities, discrimination and segregation persisted in the housing market. Families of color were discouraged or outright prevented from renting or purchasing properties.

Recognizing the limited employment opportunities available to black families after World War 2, the NAACP actively lobbied major employers to hire black workers. These efforts eventually led to the passage of the 1949 Washington State Law prohibiting employment discrimination.

1955-1979: MODERNIZATION AND URBAN RENEWAL

The construction of Interstate 5 (I-5) in March 1955 had a significant impact on downtown Vancouver. The highway's development resulted in the separation of downtown Vancouver from other parts of the city and created accessibility issues due to the lack of exits. Major arterial roads were cut off, which affected the overall fabric of the city. This transformation also played a role in the emergence of shopping malls, which drew businesses away from the city center. During the 1960s and 1970s, Vancouver embarked on an urban renewal movement. The primary objective was to remove housing in neighborhoods that appeared underdeveloped, aiming to improve the city's appearance. This effort posed a threat to many historic buildings. However, community rallies and local activism assisted in the relocation of the Slocum House which was moved from an area west of downtown to the southwest corner of Esther Short Park.

In 1970, Clark County's population was approximately 128,500, with a significant majority identifying as white. At the time, demographic diversity was much lower with only a small percentage of the population identified as black, indigenous, Asian Pacific Islander, or Hispanic. Moreover, many of these residents resided in areas located south of the I-5 bridge.

1980S - PRESENT: PROGRESS & RENEWAL

Over the past 50 years, Vancouver has undergone significant growth, particularly through annexations that have brought diversity to its population and attracted newcomers due to the establishment of numerous high-tech businesses.

As of 2020, Vancouver's population reached 193,000, making it the fourth largest city in Washington State. The racial composition has changed considerably since 1970, with white residents now accounting for 70% of the population—a significant decrease from the 99% of the time.

The Vancouver housing authority continues to play a crucial role in the community by providing subsidized housing for families, the elderly, and individuals with disabilities. Since 1989, it has been guided by the Vancouver Downtown Association, ensuring its vital presence in the city.

After advocating for more than a century, the Chinook Indian Nation successfully petitioned the United States for federal recognition as a tribe in 2001. Unfortunately, this recognition was revoked by the George W. Bush administration only 18 months later. This revocation significantly impacts Native Americans, as they

lack the same legal protections and benefits enjoyed by federally recognized tribes, such as access to housing on reservation lands.

GROWTH MANAGEMENT ACT REQUIREMENTS

THE GROWTH MANAGEMENT ACT

The State of Washington Legislature passed the Growth Management Act (GMA) in 1990 to establish thresholds and guides for growth and development statewide and to require municipalities, or local governments, in urbanizing areas to adopt comprehensive plans. Growth Management is intended to help guide growth to areas where sustainable development can occur – i.e. is there available community infrastructure such as water and sewer service. It can also promote concurrent development of schools, parks, and affordable housing and create clear expectations or predictability for community and urban growth.

Since the advent of Growth Management practices in Washington State, there has been a concerted effort through established policies to promote healthy, walkable communities with access to nature in addition to preserving Washington's natural resources and conserving and maintaining both farmlands and forested areas.

ANNEXATION

Annexation in the City of Vancouver has been guided by the Annexation Blueprint Plan, 2007, which served to identify areas within the Urban Growth Area that were urbanizing and to create a timeline for annexation. The Annexation Blueprint was initially adopted in 2003, and later updated in 2007 which included an interlocal agreement with Clark County for 10 years, and expired in 2017. This document includes a schedule for annexing lands within the Urban Growth Area which includes 18 annexation areas and 57 subareas. These annexation areas were structured into separate phases where each area is grouped into four distinct phases that span five-years. The Comprehensive Plan and Title 20 Update will include a review and update of the Annexation Blueprint Plan.

INVENTORY OF PAST AND CURRENT PLANS AND STUDIES

The City of Vancouver has an extensive library of past plans and documents that guide current policy, goals, and investments. However, there are still some gaps related to guidance on public health, public safety, food systems and place-based economic strategies.

The table on the following pages provides a summary of the vision and goals of past and current plans and studies that have informed this Atlas and that will inform the development of the Comprehensive Plan:

- 2011 Vancouver Comprehensive Plan and Zoning Code
- Subarea and Action Plans
- Vancouver Strategic Plan: 2023-2029 Update
- Vancouver Parks, Recreation and Cultural Services Comprehensive Plan 2022
- City of Vancouver Diversity, Equity and Inclusion Strategic Plan
- Reside Vancouver: An Anti-Displacement Strategy
- City of Vancouver Climate Action Framework
- Transportation System Plan
- City of Vancouver Consolidated Housing and Community Development Plan
- Urban Forestry Management Plan
- Main Street Promise
- CIty of Vancouver Shoreline Master Program
- Clark County Comprehensive Economic Development Plan 2018-2023
- Clark County Countywide Planning Policies
- An Ethnohistorical Overview of Groups with Ties to Fort Vancouver National Historic Site
- Washington Transportation Plan 2035
- State of Washington Growth Management Act

INVENTORY OF PAST AND CURRENT PLANS

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
Fourth Plain Forward Action Plan	The Fourth Plain is a culturally diverse and welcoming community with a distinct identity and sense of place. The Fourth Plain Forward Plan builds on the Fourth Plain Corridor Subarea Plan to envision how the neighborhood's multicultural business district can celebrate diversity, achieve safe streets, high-quality and accessible transit, and broadly shared economic security and opportunity.	• Cultivate a vibrant and welcoming business district • Stabilize and grow small businesses • Create a growth pipeline for food entrepreneurs • Prioritize pedestrian safety and access • Foster inclusive Transit-Oriented Development (TOD)	• Promote Transit Oriented Development (TOD) by developing density along major corridors and pedestrian safety and access	• Build on Vancouver's human capital and existing small business base • Cultivate opportunities for multicultural small business districts through the built environment and community economic development • Ensure that public works projects promote pedestrian safety and accessiblity
Vancouver Strategic Plan (2023 - 2029)	The Vancouver Strategic Plan serves to provide direction to the City for the next six years and beyond. The plan aims to make Vancouver more equitable, safe and climate friendly. As a city on the rise, this plan will ensure that the City's unique identity is preserved, while providing room for it to grow and evolve into the future.	• Enhance livability • Create an inclusive and equitable community • Encourage innovation and creative thinking • Develop sustainable and resilient solutions to economic, environmental, and social issues • Foster trust through a transparent process • Plan for an aging population	• Provide community policies that will directly influence investments based upon the City's identified core values.	• Ensure vision and guidance for the City's core values - livability, equity and inclusion, innovation, sustainability and resiliency, and community trust and relationships.
Vancouver Comprehensive Plan (2011)	The Vancouver Comprehensive Plan (2011) served as an update to the City's first comprehensive plan, adopted in 1994 under Washington's Growth Management Act. This plan envisioned Vancouver's 20-year trajectory pertaining to community and economic development, housing, environment, public facilities and services and annexation, as well as strategies for implementation.	• Maintain and enhance liveability • Plan for growth • Enhance urban centers • Facilitate connectivity • Promote public health and sustainability • Plan for an aging population	• The Vancouver Comprehensive Plan and Zoning Code (2011) offers a comprehensive land use map, zoning code and relevant policies to guide land use and development	• The Vancouver Comprehensive Plan and Zoning Code (2011) is the basis for the current Comprehensive Plan update. It includes relevant guidelines and recommendations for each area of the Comprehensive Plan

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
Vancouver Parks, Recreation & Cultural Services Comprehensive Plan	The City of Vancouver recently adopted the Vancouver Parks, Recreation & Cultural Services Comprehensive Plan, which envisioned a community with diverse recreational interests and a strong legacy of valuing parks, natural spaces and cultural services.	• Build community connections through arts and cultural programming • Address inequities through inclusive access • Provide hands-on educational experience • Develop interconnected green infrastructure that will contribute to economic vitality • Develop green spaces that conserve the natural ecosystem, provide transportation.alternatives and offer areas for stormwater retention • Promote physical activity	• Ensure safe and equitable access to parks and cultural spaces, • Ensure connectivity between parks and outdoor spaces	• Leverage and protect existing natural and cultural resources • Ensure that Comprehensive Plan recommendations align with the vision and goals of the Parks Comprehensive Plan • Promote green infrastructure and alternative modes of transportation
Evergreen & Grand Commercial Corridors Strategy	This Plan is part of the overarching Commercial Corridors Strategy (CCS), an effort by the City of Vancouver to enhance existing commercial corridors, increase transportation options, expand access to services and amenities, support job growth, and increase housing opportunities.	• Promote vibrancy, sustainability and mixed-use • Recognize and build upon the neighborhood's unique setting, history and character	• Includes a land use framework for the study area • Identifies three complementary land use areas with anchor development sites, • Recommends short-term regulatory changes as well as longer-term policies, programs, and tools • The overarching land use goal is to provide an appropriate mix of commercial and residential uses while strengthening current businesses	• Ensure balanced land uses on commercial corridors • Promote a balanced, multi-modal mobility network • Provide adequate parking • Consider urban design of public spaces to promote vibrancy and inclusivity • Prioritize small businesses in economic development strategy
Reside Vancouver	Reside Vancouver is an anti-displacement community and economic development strategy produced by the City of Vancouver. The Plan offers recommendations as to how the City can help to stabilize vulnerable communities and support them as they move towards financial self-sufficiency over time.	• Mitigate displacement and exclusion associated with population growth and investment • Ensure that development projects protect vulnerable communities from displacement	• Anti-displacement strategies require careful stewardship of the existing affordable housing stock and intentional management of vacant / underutilized land. This includes expanding and supporting Community Land Trusts (CLTs).	• Preserve the existing stock of affordable housing • Produce context-sensitive affordable housing • Ensure that workforce and economic development programs are accessible to workers, small business owners and lower-income residents

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
Vancouver City Center Vision	The Vancouver City Center Vision was intended to foster and guide the continued growth of the approximately 130-block City Center to promote a vibrant, mixed-use downtown.	• Promote residential development, including affordable housing • Support "messy vitality" • Improve the Main Street Corridor • Support the Vision with strategic investment in public infrastructure, especially transportation	• Encourage residential development, including affordable housing, in downtown • Revitalize downtown uses along the Main Street Corridor • Focus waterfront redevelopment on residential uses and public access • Protect historic buildings and neighborhoods Encourage key support services like full-service grocery • Encourage development within the western part of downtown • Promote arts, cultural, and institutional uses in downtown	• Consider the Main Street Corridor redesign as a priority project • Consider waterfront connections as a priority project • Prioritize pedestrian safety, accessibility and connectivity • Ensure that the I-5 redesign improves access to city center and consider the benefits and burdens associated with this project • Address feelings of fragmentation in downtown
Heights District Plan	The Heights Plan is an opportunity for private-public partnership that provides benefits and opportunities to a range of residents. The Heights District is a new mixed-use neighborhood on the site of the former Tower Mall. It offers easy access to major commercial uses, cultural resources and open spaces.	• Residential units will increase from 232 to 1,800, a minimum of 10% will be family units and 25% will be income-based • Collect $34 mm in tax revenue over 20 years • Achieve green/wellness certification • Increase jobs from 650 to 900-1,000, • Retain 30% of local small businesses • Ensure 30% tree canopy coverage • Reduce driving alone trips and vehicle collisions	• The Heights District Plan proposes the following land use plan: 1,340 residential units, 56,000 sf commercial, 65,000 sf office, 83,000 sf hospitality, 20,0000 sf church/ multipurpose, 6.1 acres parks/open space	• Ensure appropriate tree canopy • Promote pedestrian infrastructure • Consider anti-displacement strategies and protective measures for vulnerable individuals and small business owners living in and around the proposed Heights District
Climate Action Framework	Under the Climate Action Framework, the City of Vancouver proposes to reduce its Greenhouse Gas emissions and build resiliency to climate change impacts. The Plan charts a path to carbon neutrality by 2040.	• Embed equity in climate action • Develop a resilient, green economy • Transition to 100% clean energy • Significantly reduce per capita energy use • Build walkable, mixed-use, and compact neighborhoods • Create connected, carbon-rich natural systems • Reduce per capita waste and water use	• To achieve the vision set forth in the Climate Action Framework, land must be set aside for accessible active transportation and green infrastructure	• The Comprehensive Plan can build on specific goals related to natural resources, the built environment, parks and open spaces and public facilities set forth in the Climate Action Framework. The Comprehensive Plan can also use the Climate Action Framework to develop metrics pertaining to emissions, the green economy and green infrastructure

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
Transportation System Plan (DRAFT)	The City of Vancouver's transportation system is guided by its Transportation System Plan, or TSP. This Plan envisions that Vancouver will be multimodal and safe - with integrated goals related to climate, equity and the economy.	• Offer multimodal transportation options • Ensure safety • Reduce impact on the climate and natural environment • Support the needs of all and counteract historic and current inequities • Advance regional prosperity • Maintain existing infrastructure and invest strategically	• Increase transportation options across all of Vancouver's neighborhoods • Build a well-connected bicycle network • Establish greater separation between vehicular traffic, pedestrians and bikes • Plan for efficient emergency response • Install green infrastructure • Increase urban tree canopy (UTC) in public right-of-way (ROW) • Improve freight movement to industrial and commercial centers • Promote development patterns that support transit, walking and biking	• Promote multi-modality • Consider gaps in transit access • Promote safe systems approach to streets • Integrate climate considerations in transit planning • Prioritize investment according to current and historic inequities • Consider regional connectivity • Assess the condition of existing infrastructure and assets
City of Vancouver 2019-2023 Consolidated Housing and Community Development Plan	The City of Vancouver hopes to use HUD funding to develop affordable housing, public services, public facilities and infrastructure and economic development.	• Create, maintain and support affordable housing • Mitigate homelessness and related issues • Revitalize neighborhoods and communities • Increase economic and job development opportunities	• Consider the land use requirements for additional (affordable and supportive) housing	• Identify opportunities for creating new affordable housing and preserving existing affordable housing • Describe resource allocation and policies related to homelessness • Consider HUD funding sources for community and economic development projects
Urban Forestry Management Plan (UFMP)	Vancouver's UFMP envisions that Vancouver as an urban forest that is a healthy, dynamic, diverse and cohesive ecosystem that is valued and cared for through community stewardship.	• Manage trees as vital components of the community • Apply best management practices to the urban forest • Improve levels of service, sound policies, protocols and standards, • Continue the process of long-range planning and management • Engage and educate the community in matters of urban forestry	• The UFMP coordinates the management and administration of the urban forest	• Consider the urban forest as a vital component of the City • Incorporate the urban forest in natural resource, park and open space planning • Ensure that land use decisions consider existing trees and the urban forest
Main Street Promise	The Main Street Promise is an engineering project intended to move Downtown Vancouver towards a new era where Main Street will not only serve as the heart of the City but will be safe, accessible and connected.	• Increase safety for people and vehicles • Welcome visitors and support Main Street businesses • Improve infrastructure	• The roadway, sidewalks and adjacent outdoor spaces along Main Street will be reconfigured to improve safety, foster a sense of community and drive economic prosperity	• The Comprehensive Plan can consider how Main Street Promise might be catalytic to the surrounding downtown neighborhood, and how to ensure the goals of Main Street Promise align with those of the Comprehensive Plan

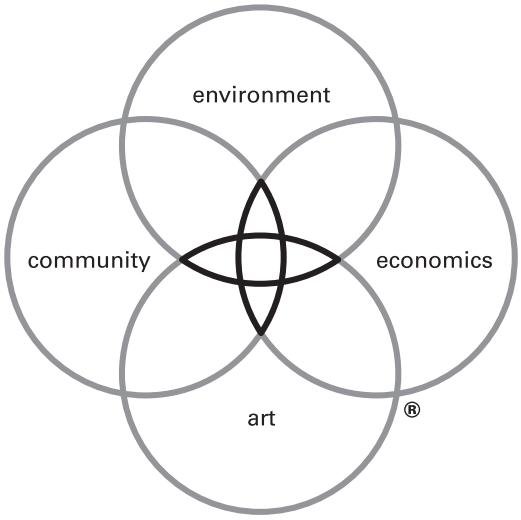
PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
City of Vancouver Shoreline Master Program	The City of Vancouver SHoreline Master Program envisions that development along the Vancouver shoreline should promote public health, safety and community welfare and will ensure no net loss of shoreline ecological functions.	• Ensure consistency between Vancouver and state shoreline guidelines • Preserve sites of historic and cultural significance • Protect shoreline resources and vegetation • Maintain an economic environment that is balanced with the natural and human environment • Prepare for flood conditions, • Increase public water access • Rehabilitate impaired shorelines • Minimize the need for shoreline armoring and develop best ecological practices in cases where it is necessary • Provide transportation, utilities and institutional facilities in shoreline areas without adverse effects on shoreline function • Promote the shoreline's aesthetic function • Maintain and enhance the quality and quantity of the region's water resources	• The City of Vancouver Shoreline Master Program defines shoreline development and management practices that are in accordance with state practices and codes. Specific guidelines are provided regarding general requirements, exemptions and uses. The goal for shoreline use and development is to balance the preservation and development of shorelines with land use patterns that allow for mutually compatible uses	• Ensure that development proposals along Vancouver's shoreline adhere to the codes and guidelines set forth in the City of Vancouver Shoreline Master Program • Assess the City of Vancouver Shoreline Master Program to determine its alignment with the goals and vision of the Comprehensive Plan • Identify any needed updates to the existing code
Regional Transportation Plan (RTP) for Clark County	The RTP envisions that the Clark County region will be a vibrant region with centers of commerce, business, industrial activity and safe neighborhoods by 2040.	• Support economic development • Ensure safety and security of the transportation system • Develop an efficient multi-modal system that enhances regional accessibility and mobility • Maximize efficient management and operations • Protect natural resources and promote energy efficiency • Ensure financial viability	• The RTP must be aligned with the region's long-range land use planning	• • The Comprehensive Plan should place special consideration on the projects prioritized as part of the Transportation Improvement Program (TIP), as these are fast-tracked for funding and implementation • The Regional Transportation Planning Organization (RTPO) coordinates transportation planning under Washington State's Growth Management Act (GMA)

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
Clark County Comprehensive Economic Development Plan 2018-2023	Clark County' Comprehensive Economic Development Plan spans the horizon from 2018-2023. The Plan envisions Clark County to be one of the most inclusive, healthy, and amenity-rich communities in the country.	• Advance sectors that offer opportunities for a variety of specializations • Focus on retention and expansion of existing businesses • Ensure that Clark County residents are the primary benefactors of all economic development activity • Leverage the diversity of the Clark County community • Capitalize on Clark County's strategic geographic location • Position Clark County as a national business center	• Plan for commercial, industrial and office land uses • Consider the possible impacts of globally-oriented economic development on Clark County residents and regional growth • Promote urban design strategies that foster a marketable sense of place	• Ensure protections are in place for existing residents and business owners • Consider strategic incentives to attract target industries • Identify strategies for developing, attracting and maintaining talent
Clark County 20-year Comprehensive Plan 2015-2035	The Comprehensive Plan encourages growth in urban growth areas and rural centers, with each area center separate and distinct from the others.	• Preserve existing housing and add housing options • Conserve natural resources • Identify and protect critical environmental areas • Shift towards non-vehicular modes of transportation • Build capacity in public facilities to prepare for anticipated growth • Ensure park planning considers anticipated growth • Preserve historic structures • Ensure that economic development anticipates future growth while protecting existing residents and businesses • Develop an urban design strategy • Prepare for annexation and incorporation	• The Land Use Element for 20-year Comprehensive Plan determines the general distribution and location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces, public utilities, public facilities and other uses. The Land Use Element includes population densities, building intensities and estimates of future population growth	• The Clark County 20-year Comprehensive Plan defines Vancouver as a major urban center with a full range of residential, commercial and industrial uses, highcapacity transit (HCT) corridors, schools, major cultural and public facilities. All aspects of the Vancouver Comprehensive Plan should consider the anticipated growth in population and density described in the Clark County Plan

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
SR 503 Corridor Plan: Vancouver to Battle Ground	The Washington State Department of Transportation envisions a future where the SR 503 corridor is a model of efficient and sustainable transportation while accommodating the needs of a diverse group of users while enhancing and promoting vibrant communities.	• Review vehicle access along the corridor to determine whether it is too restricted or too unrestricted • Develop strategies for a connected and low-stress active transportation network • Consider industrial, commercial and residential growth in the city of Battle Ground and north Clark County and its effects on congestion • Explore Practical Solutions and Transportation Systems Management and Operations (TSMO) strategies to maximize use of existing infrastructure • Determine Transportation Demand Management, transit and other TSMO strategies to provide mobility, access and congestion relief • Improve corridor safety • Identify any equity and environmental justice issues and determine strategies to address them	• Land use factors to be taken into account encompass existing deficiencies in active transportation options, including biking, walking, and rolling facilities, as well as the accessibility of transit and addressing issues with vehicle congestion. Safety enhancements and the development of strategies for freight mobility planning along the north-south highway in adjacent communities in north and central Clark County are also crucial for the well-being of local residents and businesses."	• The Comprehensive Plan should prioritize the examination of safety and accessibility concerns related to active transportation networks, specifically focusing on the SR 503 corridor due to its growing usage. It is essential to assess the potential effects on residents and businesses in specific communities and implement ongoing management strategies for this corridor

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
C-TRAN 2021-2026 Transit Development Plan	C-TRAN presents itself as one of the leading transit agencies that connects people to opportunities which support economic vitality, and enhance residents quality of life for the community.	• Based on the principals guided from the Washington Transportation Plan, C-TRAN key elements include • Increase service by up to 10% in the next two (2) years • Maintain the current target of service designed with 80% toward productivity and 20% toward coverage • Identify/prioritize the next BRT corridors • Look to innovative coverage – Mobility on Demand • Consider additional Park and Rides • Increase base capacity to accommodate more buses • New Administration/Operations facility • Stay on top of Paratransit needs.	• "Land use factors should encompass the City of Vancouver, various districts within Vancouver, neighboring communities, and towns, along with the provision of services in collaboration with neighboring partners. Ensuring accessibility to transportation networks like TriMet and Portland Streetcar, Lower Columbia Community Action Program, and Skamania County Public Transit is crucial to cater to the needs of Vancouver residents and the surrounding areas. Additionally, prioritizing services for resilient infrastructure and improvements is equally important."	• "The Comprehensive Plan should take into account the Transit Development Plan and its connections to residential, business, and industrial districts where communities experience inadequate access to quality transit options and connections. It is of utmost importance that development proposals and projects adhere to guidelines that prioritize the environment, safety, mobility, accessibility, and equity for Vancouver and its diverse transportation networks."
Clark County Labor Market Information - Regional Economy Information	N/A	• More Choices • Unique Attributes • Easy Walking Distance • Open Spaces • Public Spaces • Conservation • Economic Development • Sustainability • Commercial Buildings • Economic Restructuring • Public Services • Regional Services • Broad Support • Participation • Compact Development • Balance Residential Projects	• Considerations should prioritize the unique needs of various communities and industries, taking into account the workforce composition. This includes giving special attention to healthcare workers, who form a significant portion of Vancouver's prominent workforce, as well as retail, leisure and hospitality, manufacturing, and government employment sectors. Additionally, it is essential to study the distribution of occupations and income in relation to job location and accessibility.=	• The Comprehensive Plan should undertake a thorough examination and evaluation of the labor force, unemployment rates, wages and income, as well as the geographic distribution in order to comprehend the disparities within the Clark County Labor Market and its regional context. Guided by the principles of environmental preservation, equity, opportunity, and accessibility, the comprehensive plan should address these factors to shape the values associated with the labor market in Clark County.=

PLAN	VISION	GOALS AND RECOMMENDATIONS	LAND USE CONSIDERATIONS	COMPREHENSIVE PLAN CONSIDERATIONS
Washington Transportation Plan 2035	By 2035, it is envisioned that Washington's transportation system should safely connect people and communities, fostering commerce, operating seamlessly across boundaries, and providing travel options to achieve an environmentally and financially sustainable system.	• Economic Vitality: To promote and develop transportation systems that stimulate, support, and enhance the movement of people and goods to ensure a prosperous economy • Preservation: To maintain, preserve, and extend the life and utility of prior investments in transportation systems and services • Safety: To provide for and improve the safety and security of transportation customers and the transportation system • Mobility: To improve the predictable movement of goods and people throughout Washington State, including congestion relief and improved freight mobility • Environment: To enhance Washington's quality of life through transportation investments that promote energy conservation, enhance healthy communities, and protect the environment • To continuously improve the quality, effectiveness, and efficiency of the transportation system	• Land use factors should incorporate the establishment of a thriving and stable economic environment, the preservation of existing transportation systems, and the development of necessary infrastructure to meet transportation needs. Safety and accessibility for customers should be prioritized, while efforts to enhance the physical environment and improve the quality of life in the state of Washington, such as relieving congestion and fostering healthy communities, should also be pursued	• The Comprehensive Plan should be harmonized with the objectives and goals outlined in Washington's 2035 transportation plan, as well as future aspirations, in order to deliver quality transportation services that are both environmentally and financially sustainable and mindful. Recognizing the significance of community needs and goals in relation to transportation is crucial for effectively connecting people and communities
Washington Transportation Plan 2040 and Beyond	This policy plan provides the overarching framework for state and local transportation departments to deliver an integrated, multi-modal system that meets the travel needs for all residents and transportation system users.	• Washington Statewide Goals: • Make the best use of existing infrastructure, services, and resources • Increase safety and efficiency while keeping life cycle costs as low as possible 3 • Increase travel choices, system reliability, and person throughput • Align transportation policies and investments to support statewide economic, societal, and environmental objectives	• Planning for community and regional growth requires careful considerations that support specific economic, social, and environmental initiatives. Enhancing programs such as intersection plans, paving programs, and congestion management tolling plans acknowledges the significance of mobility in accommodating the anticipated rapid changes in the state of Washington. In addition, land use recommendations underscore the importance of developing multi-modal transportation infrastructure to effectively address the community's needs while adhering to the guidelines established by the Washington Transportation Plan	• Transportation Plan System Policy Goals of Washington, encompassing Economic Vitality, Preservation, Safety, Mobility, Environment & Health, and Stewardship, should be emphasized and prioritized. Beyond transportation, it is essential to thoroughly consider economic opportunities, promote equitable commerce, and offer accessible travel options. These efforts aim to establish a financially stable system that effectively caters to the diverse needs of communities at the local, regional, and state-wide levels



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Racially Disparate Impacts Memorandum

December 2024

Introduction

The following memo provides recommendations for the City of Vancouver's approach to address the new requirements imposed by Washington State House Bill 1220 (HB 1220), specific to racially disparate impacts (RDI) in housing. This report was completed based on guidance from the Washington State Department of Commerce and examples from other jurisdictions in Washington. The specific requirements for the housing element of the comprehensive plan are discussed followed by explanatory text for meeting each requirement.

Legislative Requirements

Washington State House Bill 1220, which passed in 2021, provided an updated set of requirements to the Growth Management Act (GMA) (RCW 36.70A.070) specific to the housing element. Any jurisdiction in Washington State compelled by the GMA to update their comprehensive plan in 2024 or after must adhere to these new requirements. In addition to the main focus of this bill- matching anticipated population growth with affordable housing- there is an additional component to ensure that new and existing housing policy works to address and mitigate racially disparate impacts (RDIs), displacement and exclusion.

Sec 2. (2) A housing element ensuring the vitality and character of established residential neighborhoods that:

…

(e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:

(i) Zoning that may have a discriminatory effect;

(ii) Disinvestment; and

(iii) Infrastructure availability;

(f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;

(g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and

(h) Establishes antidisplacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

Source: RCW 36.70A.070 (2022)

Definitions

It's important to create a common understanding for the key terms used in HB 1220. The WA State Dept. of Commerce released Racially Disparate Impacts Policy Review Process which included this set of definitions:

Displacement: The process by which a household is forced to move from its community because of conditions beyond their control.

- Physical displacement: Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality.
- Economic displacement: Households are compelled to move by rising rents or costs of home ownership like property taxes.
- Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Displacement risk: The likelihood that a household, business or organization will be displaced from its community.

Exclusion in housing: The act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts.

Racially disparate impact (RDI): When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

Commerce Guidance for RDI in Housing Element

The Department of Commerce supplied a Housing Element Checklist to review for compliance with the newest requirements of HB1220 for both affordable housing and RDI presented as elements 1-4 of the following list. These represent the first four chapters of the following memo.

1. **Include a statement of whether data shows if there are disparate impacts.**
    a. This statement should indicate if housing data striated by racial groups and historic evidence demonstrates RDI.
    - Comprehensive plan should include an analysis of the data collected in the equity analysis, housing needs assessment, and any supplemental US Census demographic data (such as the indices included in the RDI Spatial Mapping Appendix).
2. **Review of housing element policies and regulations that have led to these impacts.**
    a. Conduct an audit on past policy and regulation, for form (language) and function (results), and present the results of this analysis.
    - Comprehensive plan should include the results from RDI Policy Audit for Title 20, 2011 Comprehensive Plan, and other applicable housing policy.
3. **Include policies to address these impacts, or that address development of more affordable housing, preservation of existing affordable housing, and protection of existing housing.**
    a. Based on the RDI data and previous RDI inducing policies (1 & 2) target new policies to mitigate for those impacts.
    - New housing policy that intends to undo identified RDI, should be denoted within the Comprehensive Plan Housing Element.
4. **Discussion and/or map of areas that may be at risk of displacement.**
    a. Identifying displacement risk by neighborhood so as to target policies by specific neighborhoods and groups.
    - Comprehensive plan should present displacement risk map, identified higher risk areas (RDI priority neighborhoods) and any supporting findings of displacement.

Supporting Chapters

The City's response to addressing RDI is best informed if it examines policies that are best suited to the RDI concerns of individual neighborhoods. As such this memo includes two supplemental chapters that identify neighborhoods of particular concern, based on RDI indices or a history of racial segregation, and provide specific policy recommendations.

5. **Tailoring RDI Mitigation to the Most Impacted Neighborhoods**

a. Identifies the 5 neighborhoods with a high BIPOC population share and poor RDI outcomes.
b. For each neighborhood, based on their specific characteristics, provide recommendations to undo RDI and support growth without displacement.

6. De-Segregating White Dominant Neighborhoods

a. Identifies 4 neighborhoods in Vancouver with a history of racial deed restrictions (one removed due to a lack of present day racial segregation)
b. For each neighborhood, based on their specific characteristics, provide recommendations to create opportunities for BIPOC groups to move into the neighborhood.

1. Data & Historic Precedent Indicating RDI

Include a statement of whether data shows if there are disparate impacts.

Racially Disparate Impacts

An analysis of RDI in housing involves looking at a community's breakdown of race and ethnicity and comparing it to the number of households that rent as opposed to own, their housing costs (rent/mortgage). The City has already reviewed both of these factors individually through the Equity Analysis (EA) and Housing Needs Analysis (HNA).

Upon a review of the EA and HNA a few statistical findings stand out:

- Population Share
  - Between 2011 and 2021 the population of American Indian and Alaskan Native (AIAN) and Black fell 22 and 20% respectively (EA)
  - Vancouver's Pacific Islander population is rapidly growing, increasing 21% from 2020 to 2021. (EA)
  - In comparison to their distribution in the county overall, POC are more likely to live in urban areas. (EA)
- Housing Type
  - BIPOC residents (excluding Asian) are more likely to live in multifamily and less likely to live in single family. (EA)
  - BIPOC residents (excluding Asian) are more likely to rent instead of own their housing with homeownership rates from 26-35% compared to the city's 51% (EA)
- Economic / Housing Cost-burden
  - Median household income was lower for Black and Hispanic than any other racial group and $24,185 and $10,973 respectively, below Vancouver's median. (HNA)
  - Housing cost-burden and severely cost-burden by race is higher for Black or African American (52%), and Hispanic or Latino (45%). (HNA)
- Transportation
  - BIPOC residents (excluding Asian) are more likely to rely on public transit or carpooling for their commutes compared to county. (EA)
- Educational Attainment
  - Hispanic/Latine and Native Hawaiian/Other Pacific Islander students continue to be disproportionately attending lower performing schools according to 3rd grade reading and math standards. (EA)
  - BIPOC (excluding Asian) students perform worse on kindergarten readiness, 3rd and 8th grade standardized tests than their white or Asian peers. (EA)
- Green Space
  - Block groups with higher proportions of people of color have 2.4% less tree canopy than the average for the city. (EA)

These data points demonstrate a Racially Disparate Impact exists between different racial groups and their ability to afford housing, rates of homeownership, and other factors indicating wealth and attainment.

Historic Context

Nearly all racially disparate or equity analyses in housing look at a similar set of known policies or events that have caused inequalities in housing particular to specific racial groups. These include Redlining; VA Homeownership loans; Covenants, Conditions, and Restrictions (CC&R). In addition, Vancouver specifically saw public housing segregation through the Vancouver Housing Authority war-time housing. I will discuss each of these below.

Redlining

The Home Owners' Loan Corporation (HOLC) was a federal agency created under New Deal legislation focused on buying and refinancing loans where borrowers were behind on repayment and issuing lower cost terms. In addition, it was notoriously the entity behind redlining, which graded the "residential security" or riskiness of different neighborhoods of many cities across the US, in a practice later colloquially known as Redlining. These mapped boundaries were defined by racial demographic data with areas having a higher POC percentage given a riskier rating. Banks and lenders would use these maps to determine which areas would be given loans to build and buy homes.

Emerging evidence is continuing to find present-day health disparities and crime for residents in formerly redlined communities. For example, there have been identified higher rates of heart disease, diabetes, pre-term death, COVID-19 outcomes, mental health, and gunshot ER visits. (Egede, 2023) These neighborhoods also experience increase housing instability and eviction. (Gerken, 2023)

Fortunately, Clark County doesn't have any recognized historic redlining maps, however its larger neighbors Portland, Tacoma, Seattle, and Spokane all have officially recognized redlining maps. (University of Richmond)

Covenants, Conditions, and Restrictions

CCRs were another widespread method to restrict POC homeownership through writing requirements into a property's deed, plat, home owners association, or other property documents. Unfortunately, a fairly common practice during the 1930-50s was to restrict the sale or occupation of the property non-white individuals and families. These requirements "run with the land" to restrict any subsequent property buyer from being a POC. While the earliest so far reported CCR in Washington State was from 1907 the practice became much more common after 1926 after the Supreme Court ruling of Corrigan v. Buckley. These deed restrictions were commonplace even after the Shelley v. Kramer decision of 1948 which ruled them to be unenforceable, until they were finally made illegal in the 1968 Fair Housing Act.

The University of Washington Civil Rights and Labor Consortium has an ongoing project to identify and record CCRs across the state. They recently published their findings for Vancouver and Clark County. They found that within Clark County there were 1,367 parcels and 34 subdivisions with racially restrictive covenants. Typical restrictions included language banning sale of the property to "anyone other than the white (or Caucasian) race." However, some spelled out individual races that were restricted from purchase, particularly Black and Asian.

- "and that they shall never sell, give, convey, or lease any interest therein to any person of the **African or Mongolian races**." (Home Addition Plat, 1926)
- "be in any manor used or occupied by **Chinese, Japanese, or Negroes**, except that persons of said races may be employed as servants by residents" (Telocaset Plat I & 2, 1940; Slerat Highlands Repeat Blocks B & C, 1947)
- "that no **oriental or negroes** may occupy any building except as servants of the owners" (Lincola Park, 1938)

While the earliest reported CCR in Washington State was from 1907 the practice became much more common after 1926 after the Supreme Court ruling of Corrigan v. Buckley. These deed restrictions were commonplace even after the Shelley v. Kramer decision of 1948 which ruled them to be unenforceable, until they were finally made illegal in the 1968 Fair Housing Act. Vancouver's neighborhoods still exhibit residual segregation as a product of CCRs in its past.

The map shown below portrays the distribution of identified racial CCRs in Clark County overlayed on a map of BIPOC as a share of the total population. Broadly, the "white only" neighborhoods with historic CCRs are still some of the least racially diverse, with BIPOC share of the population ranging between 11 and 30 percent. Historic segregation has left its mark on the demographic background of the city as a whole, impacting AAPI, Native American, and all other BIPOC groups.

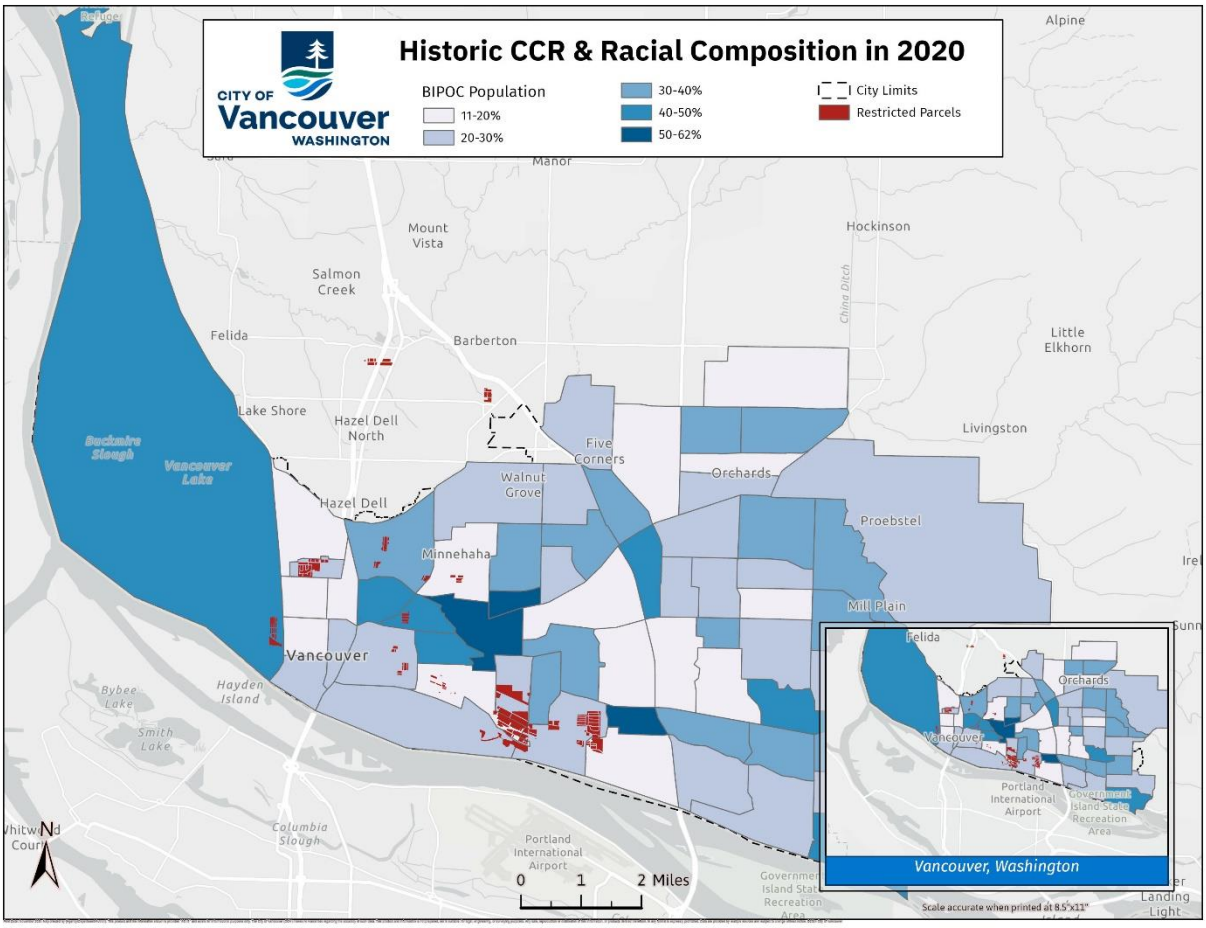


Figure 1. Historic CCR and Racial Composition in 2020 (Source: Washington State, University of Washington)

Within Vancouver, higher prevalence of CCRs is found in Heights and Evergreen Highlands neighborhoods, broadly the area defined by Millplain to the river, and Andresen to 98th Ave. In addition, the Lincoln Neighborhood and Sampson Ave in East Fruit Valley and others scattered throughout Central Vancouver. The presence of historic CCRs within these communities likely contributed to racial inequities present within these neighborhoods.

VHA Public Housing Segregation & Closure

The Vancouver Housing Authority was the city's public housing organization. During WW2, the VHA was responsible in creating 12,350 family units and 10,000 dormitory units for those moving into Vancouver to work in the Kaiser shipyards and the broader war-industry. (Vancouver Housing Authority, 1945) Many of the emigrants who moved into VHA public housing were black, with the 1945 city census reporting nearly 9,000 black people in 1945 up from just 18 in 1940. (HistoryLink) There is evidence of segregation within the projects, based on the demographics of the projects and in historic documents. (Fourth Plain Forward).

In addition, upon the end of the war and the wartime industries the VHA opted to demolish much of the public housing ending what many long-term residents described as a "foreign invasion." The Authority also feared that leaving the housing available could lead to a damaging drop in property values. "The great unbridled development would, inside of a generation, be a slum area that no small community in the country could tolerate." (Vancouver Housing Authority, 1945). Only one thousand or roughly 20% of the wartime homes were resold to "postwar stranded population, low-income families, and military personnel." (Fourth Plain Forward) Internal memos describe how these would not be used to house "colored families." The remaining nearly 80% of the housing units from the projects were demolished and the land used to create schools and carefully controlled subdivisions, benefitting the pre-war primarily white residents and returning Veterans. VHA's policies appear to have direct intentions to force out the POC temporary war workers, while creating more affordable housing and public resources for the existing white community.

VA Homeownership Loans

Following WWII, the federal government provided home loan backing, a $2,000 guarantee of repayment, for any returning Veteran who served at least 90 days, which went a long way at the time for securing housing. (Veterans Association) Over time the program was adjusted to provided more financial support as home prices increased, however, because of historic unequal recruiting practices, these policies have disproportionately benefitted white families. This policy has been credited as one of the most damaging to long-term POC homeownership.

2. Existing Policy Audit

Review of housing element policies and regulations that have led to these impacts.

The City of Vancouver is required to complete an audit of past housing policies that have led (or have the potential to have led to identified RDI's. This policy audit should include a set of guiding questions, criteria (scoring system), and recommended changes. Then reviewing the historic and modern demographic context provides a way to understand the direct and indirect RDIs, displacement, and exclusion.

Specific lenses through which each policy was reviewed include:

1. **Language clarity and potential for bias**. Whether the policy includes use of coded or unclear language that can lead to inequitable application.
2. **Deficit-based language**. Whether the policy uses language that can lead to an under-appreciation of the needs and contributions of people in specific groups.
3. **Impact on housing stock**. Whether the policy introduces barriers, such as excessive regulation, or incentives to overall housing stock and affordable housing to meet Bellevue's goals.
4. **Impact on housing mix**. Whether the policy prioritizes certain residential uses, and which uses are prioritized.
5. **Distribution of impact by geography, income, and community**. Whether the policy creates benefits and burden or risks that will be unevenly distributed.

6. **Mitigation for anticipated impacts**. Whether the policy includes consideration of impacts and plans to mitigate them, including displacement risk.

These RDI analysis 'lenses' are from Bellevue's Racially Disparate Impact Analysis based on Washington Department of Commerce Guidance. Vancouver should review each policy through these lenses and subsequently the rubric below provided by WA Dept. of Commerce to score each policy.

Table 1: Equity Policy Analysis

Criteria	Evaluation
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement, and exclusion in housing.	"S" Supportive
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.	"A" Approaching
The policy may challenge the jurisdictions' ability to meet the identified housing needs. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	"C" Challenging
The policy does not impact the jurisdiction's ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.	"NA" Not Applicable

Source: Washington Department of Commerce HB1220 RDI in Housing

Following the discussion on policy evaluation criteria the city provided the results of their RDI analysis on both housing and non-housing policies. These could be useful in Vancouver's analysis, informing some potential areas of language obscurity, bias, or unintended consequences.

Identified Concerning Policies for RDI in Housing

A preliminary audit of City of Vancouver Policies identified a few instances of potentially concerning policies from the existing 2011 Comprehensive Plan and Development Code.

Table 2: Potentially concerning policies identified in the 2011 Comprehensive Plan

Policy	Language	Comment
H-4 Neighborhood Character	Encourage innovative housing policies that provide for affordable housing and maintain neighborhood character.	Maintain neighborhood character largely means SFR character in Vancouver as the predominant housing type.
CD-3 Infill and Redevelopment	Where compatible with surrounding uses, efficiently use urban land by facilitating infill of undeveloped properties, and redevelopment of	Compatibility with surrounding uses (largely SFR) could mean that the neighborhood is unable to redevelop with increased density. The policy

	underutilized and developed properties. Allow for conversion of single to multi-family housing, where designed to be compatible with surrounding uses.	could better define compatibility as scale or design and/or which neighborhoods this applies to.
CD-9 Compatible Uses	Compatible uses Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.	Creating a cohesive, compatible neighborhood is good, but most of the time this means new development must be tailored to suit SFR instead of the neighborhood adapting to higher density.
Land Use Designation (Zoning) Map	The land-use map directs a majority of the city area to be exclusively zoned as SFR, which until recently only allowed one structure per parcel.	Restricting a majority of the city to this land-use type has established a precedent of sprawl, housing unaffordability, and exclusion for socially vulnerable groups including BIPOC.

Table 3: Potentially concerning policies identified in the Development Code "Title 20"

Code Element	**Language**	**Comment**
20.110.010 – Administration – Intent and Purpose	B.5 "preserving the character of existing neighborhoods"	"Preserving the character of existing neighborhoods" can be coded nimby-ism
	B.1 "effectively meet citizens' needs"	"Citizens" can be exclusive to varied immigration statuses. i.e. If you're not a citizen the city isn't designed for you
20.265.010 – Design Review – Purpose	A. 1 "Preserve the character and quality of the City's cultural, historic, and architectural heritage"	Vancouver's cultural heritage almost entirely based on white culture and history and doesn't reflect its present diversifying residents
20.420.050 – Mixed Use Standards and District – Development Standards	A. "create safe, attractive and convenient environment." *Note: There are many other chapters where "attractive" occurs, this one serves in place of listing all occurrences*	"Attractive" is subjective, and can lead to continuing existing design standards and styles that lend themselves to historic SFR (which are less attainable for BIPOC communities)
20.515.010 – Hough Neighborhood Overlay District – Purpose	"Maintaining the residential character of the neighborhood, which is primarily zoned for low-density residential development (R-9)"	We need to examine if protecting the character of SFR is an important goal. Can be used to exclude other home types and density (which are more often attainable for BIPOC communities)
20.810.010 – ADU – Purpose	"Does not cause unanticipated impacts on the character or stability of single-family neighborhoods"	This language implies that ADU's are likely to cause these kinds of negative impacts to SFR
20.920.060 – Tier 2 Infill Standards	G.1 "ensure compatibility of infill development with the character of existing residential structures."	Compatibility with existing residential structures (especially SFR) can perpetuate lower-scale development and contribute to less opportunity for housing attainable to less affluent and BIPOC communities
	"To encourage new infill development that complements the existing	Similarly, complimenting the existing often SFR neighborhood can lead to

	neighborhood character"	more of the same with less opportunities for BIPOC groups

There is a common thread between the potential to cause RDI and low-density housing (Single Family Residential) due to historic and present inequities in BIPOC communities' ability to afford a single family detached home. Continuing to zone for and produce only low density housing or requiring that new or infill developments match the standards set by historic single-family neighborhoods perpetuates inaccessibility for affordable housing and homeownership for BIPOC communities and any downstream impacts those cause.

3. Policies to Mitigate for RDI

Include policies to address these (RDI) impacts, or that address development of more affordable housing, preservation of existing affordable housing, and protection of existing housing

Equity Driven City-wide Policies

Not only does HB 1220 require reviewing the city's existing policies, but it asks cities to examine what new policies it can put in place to undo racially disparate impacts, displacement and exclusion associated with past policies. Broadly these policies are any that preserve and promote housing affordability, retain the existing community, support the local economy, and include community voices in planning.

Example policies and their categories:

- **preservation of historical and cultural communities**
    - Identifying neighborhoods at a higher risk of displacement then establish protective policies such as right to return, affordable housing requirements in new developments,
    - Promoting art celebrating cultural groups by artists from those groups
- **investments in low, very low, extremely low, and moderate-income "affordable" housing**
    - providing incentives for developments to maintain a number of housing units at a rate affordable to low-income households
    - Supporting the creation of a community land trust to purchase and manage properties at affordable rates
- **inclusionary zoning**
    - Removing zoning designations that require single family residential (SFR), and instead encouraging "middle housing including SF attached, ADU, Cluster Villages, etc.
- **community planning requirements**
    - Including underrepresented and underserved communities at all stages in planning efforts in a leadership capacity
- **tenant protections**
    - eviction protections;
    - notice of land-sale; and
    - right of first purchase
- **land disposition policies**;
    - right to return
    - right of first refusal
- **consideration of land that may be used for affordable housing.**

    - Including policies that require or encourage affordable housing especially in areas that support active transportation and connected neighborhoods (TOD, Mixed Use Neighborhoods)

There are a few more policy categories that lead to reductions in RDI including:

- **Community-led and community-owned housing and development including stewardship and land and home ownership.**
    - Limited Equity Cooperative (MFR and MHP Cooperatives)
    - Community Land Trust
    - Live-work land-use
- **Strategies to increase equitable access to opportunity and generational and community wealth building.**
    - Down-payment assistance
    - Community Investment Trust

The City should further examine policies within these categories that are specific to the local and historic context and encourage community participation in identifying what policies they value.

Community Engagement

Community engagement and representation are crucial to all parts of city planning, and the RDI analysis is no different. While there was no direct mention to community engagement in HB 1220, the Washington Department of Commerce emphasizes how important involving community voices are in this process. It asks that the RDI Analysis include opportunities throughout for the process to hear and include the community's concerns including determining past and present inequities, measurement criteria, and policies they consider to be harmful. Following the RDI analysis, results should be presented to community representatives to determine any missed areas of concern.

The City of Vancouver should provide opportunities for racial minority communities to comment on historic and present RDI, displacement, and exclusion in housing, and to identify existing policy changes and new policies to remove or reduce RDI, displacement, and exclusion in housing. This can be done through targeted workshops, and focus sessions with equity and racial equity and community focused advocacy groups such as:

- City of Vancouver Equity Working Group
- School Affinity Groups
- CBO Working Group

4. Identify Displacement Risk

Discussion and/or map of areas that may be at risk of displacement.

Equity Index & Displacement Risk Assessment Tools

The City of Vancouver has published an online mapping application that shows areas across the city categorized based on their equity and displacement index scores. These scores were created in 2022, based on the methodology used in the City of Portland's 2018 Gentrification and Displacement Neighborhood Typology Assessment and Dr. Lisa Bates' previous work at the University of Portland. The equity index compiles a weighted set of demographic factors including race/ethnicity, age, income, housing, education, English proficiency, and disability. These same indicators were then used alongside Regional Multiple Listing System (RMLS) home value data, from 2000-2020 and 2015-2020.

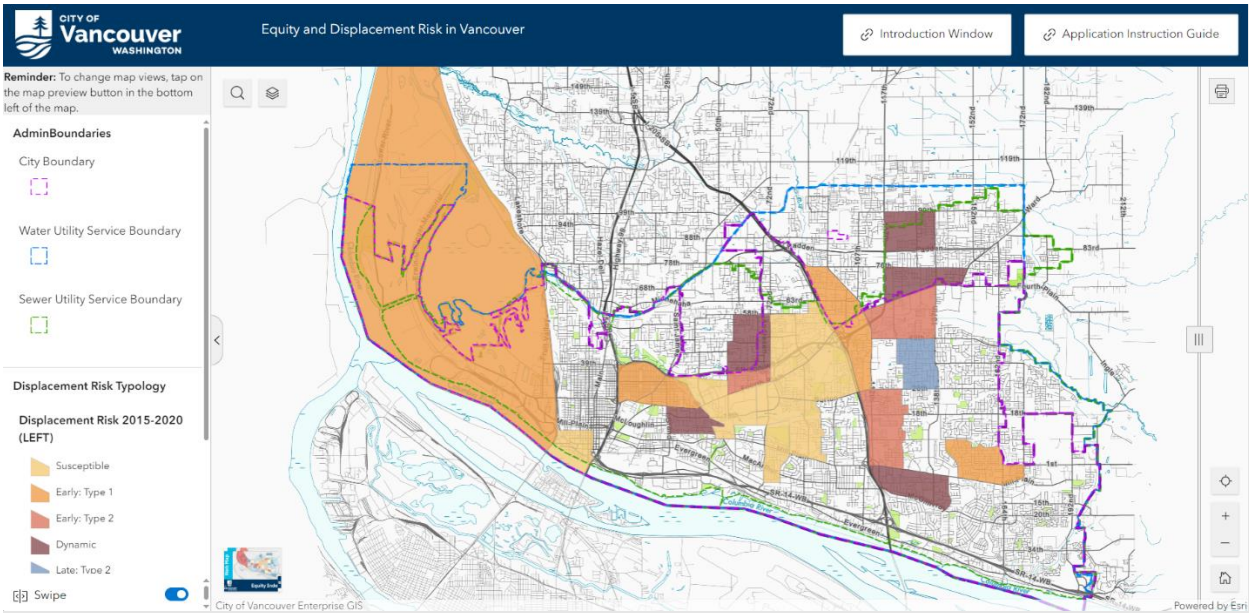
Table 3. Displacement Risk Categories

Typology	Vulnerable population?	Demographic change?	Housing market condition
Susceptible	Yes	No	Adjacent
Early: Type 1	Yes	No	Accelerating
Early: Type 2	Yes	Yes	Adjacent
Dynamic	Yes	Yes	Accelerating
Late: Type 1	Yes	Yes	Appreciating
Late: Type 2	Used to be in 2000	Yes	Accelerating
Continued loss	Used to be in 2000	Increasing share of white people and adults with four-year degree	Appreciating

Source: Displacement Risk Methodology, City of Vancouver, 2022

Vulnerable population includes social vulnerability indicators including median household income, race, housing tenure (renter/owner), educational attainment, and low-income. Demographic change examines if the census tract has become less racially diverse during the time examined, this separates early (may see displacement in the future) from late (has already experienced displacement) typologies. Lastly, housing market conditions examines if the census tract or an adjacent census tract is experiencing significant housing value changes.

This kind of analysis is very important because it not only identifies where displacement has been occurring but where it may be expected in the future. Using this map as reference can inform where new development could have a higher likelihood of causing displacement, indicating where development should be avoided, or more likely, where targeted displacement policies and careful review and planning are necessary.



Source: Equity and Displacement Risk Application

The analysis identified several census tracts just east of I-205, Andresen, and Hudson Bay neighborhoods as already experiencing demographic changes (displacement). Several other areas including fruit valley, downtown, and along fourth plain are in the early stages of displacement (at risk).

5. Tailoring RDI Mitigation to the Most Impacted Neighborhoods

Key Takeaways:

RDI Priority Communities
Tier 1:

1. Fourth Plain
2. Fruit Valley
3. North Cascade Park (East Mill Plain)

Tier 2:

4. Rose Village
5. Central Vancouver Heights

Introduction

Blanket equity policies across the city will always be less effective than policies specific to the neighborhoods most in need. Therefore, establishing a set of neighborhoods most impacted by racial inequities can be especially useful. For RDI, those targeted neighborhoods should be those with larger populations of BIPOC and those who score poorly based on these measures.

The following chapter works to address RDI on a neighborhood specific basis.

1. Review of RDI and BIPOC population spatially to see trends in location.
2. Determining the neighborhoods with higher RDI concern.
3. Identifying policies that mitigate and undo the RDI felt in those neighborhoods.

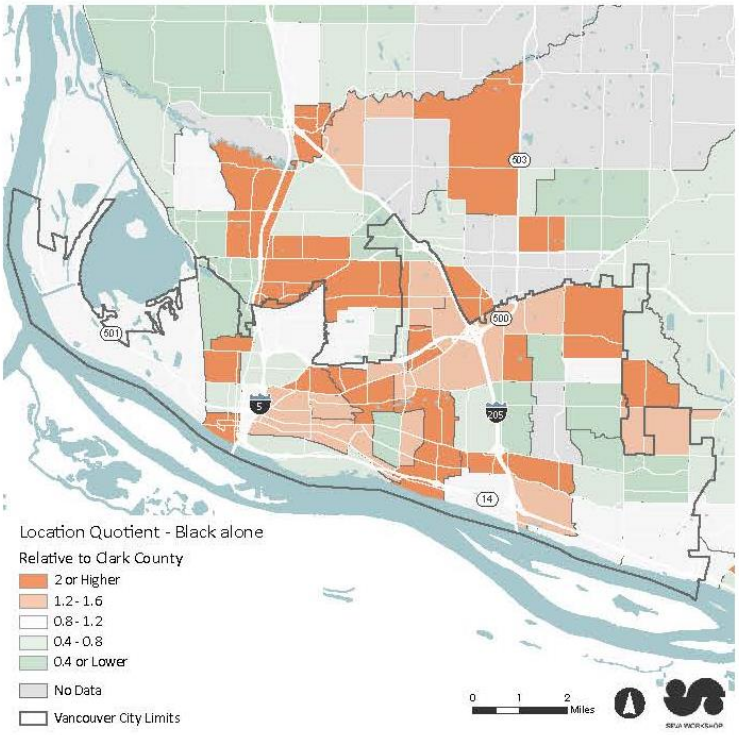
Identifying RDI Priority Communities

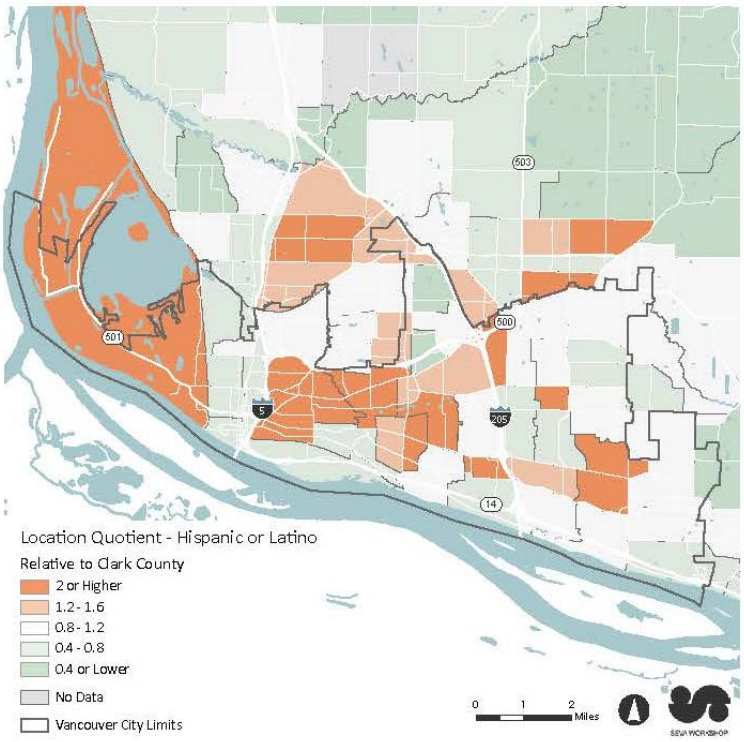
BIPOC Population

People of color are more likely to live within City of Vancouver boundaries than in other parts of Clark County. The Equity Analysis identifies the three neighborhoods across the city with the highest BIPOC population to be Fruit Valley, Fourth Plain, and East Mill Plain. However, these pockets differ by race and ethnicity within POC.

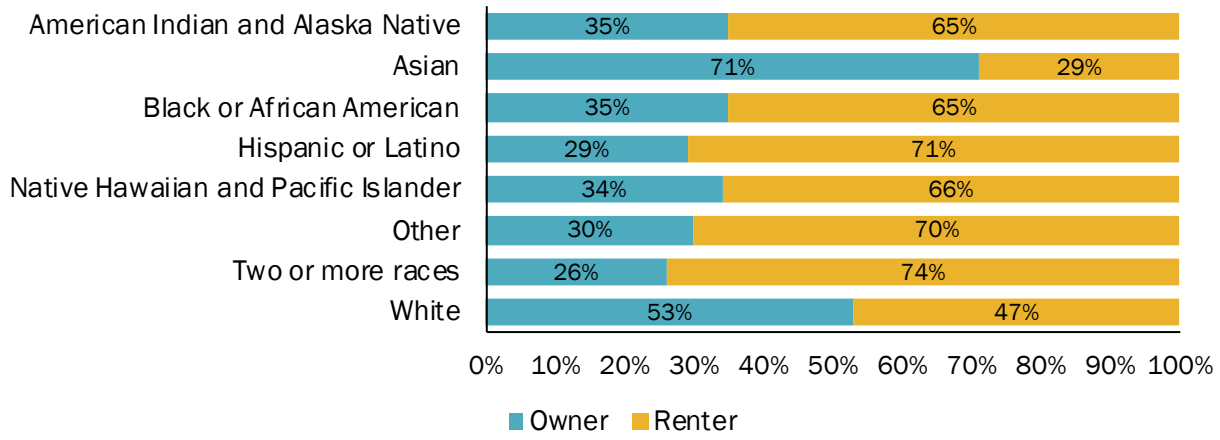
The following maps show the distribution of race across the city and surrounding Clark County, created as part of the Equity Analysis. Planning efforts to address RDI should focus on where policies would mitigate inequalities for a significant number of BIPOC. Based on Vancouver's racial demographics, the areas of focus should be the census tracts with over 2% of the population in ethical groups other than white. As such, these identified areas include Fourth Plain, Fruit Valley, and North Cascade Park.

Image Source: City of Vancouver, Equity Analysis 2024





Although the Asian population is a racial minority included in BIPOC, it is not of particular concern for RDI, at least in Vancouver. For example, Asian populations in Vancouver have higher incomes, higher educational attainments, and higher homeownership rates than any other racial group, including Whites. The chart below finds the difference in homeownership rates by race, as presented in the Housing Needs Assessment.



Household Tenure by Race and Ethnicity, Vancouver, 2021 (From HNA)
Source: SEVA, ACS 5-Year Estimates, 2017-2021

Priority Community Rationale

Based on BIPOC population distribution results (2% or higher for Black and Latino) and a review of RDI concerns described in the RDI Spatial Data Appendix the following RDI Priority Communities are identified. Tier 1 priority communities had poor scores for all the RDI indices while Tier 2 scored poorly for only a subset (3 or more indices).

<u>Socioeconomic Vulnerability Indicators:</u>

High BIPOC Population (over 2% BIPOC share of population)

- High or Highest Equity Index Score
- Displacement Risk Index Geographies
- Higher Rates of Poverty (13.5 – 36.8%)
- High Rates of Cost Burden by Housing (> 30% Median Rent/Median HH Income)
- Low Median Household Incomes (< $70,000)
- Low Educational Attainment (<25% of 25-years-old or older population with a Bachelors Degree or Higher)

RDI Priority Communities

Tier 1:

1. Fourth Plain
2. Fruit Valley
3. North Cascade Park

Tier 2:

4. Rose Village
5. Central Vancouver Heights & Northwood

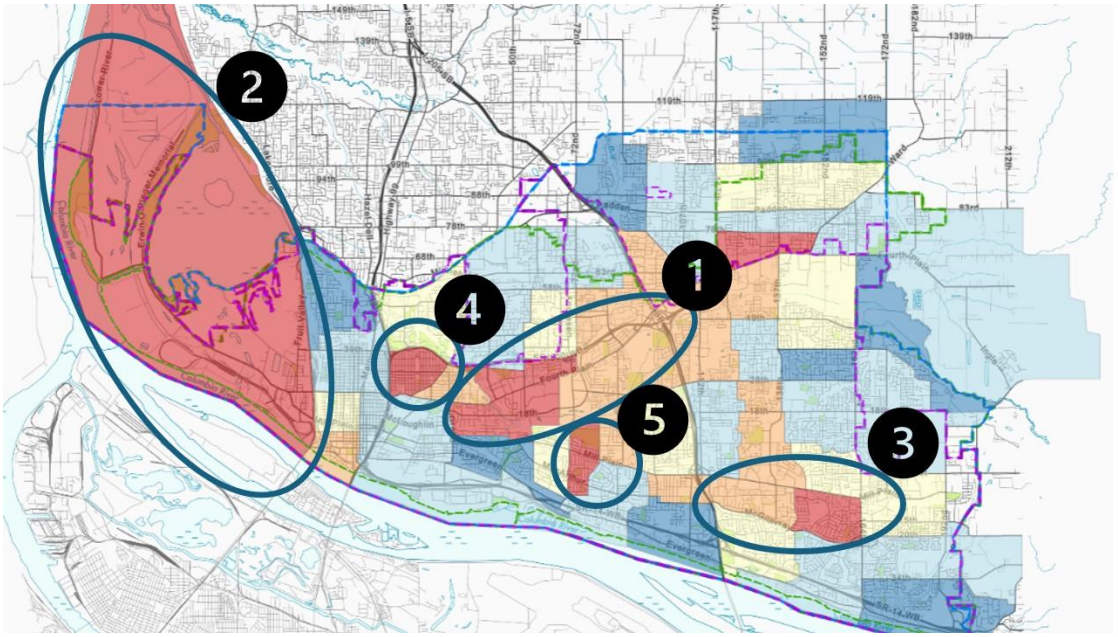


Image: Map shows RDI Priority Communities overlaid on the Equity Index Map, where Red indicates highest measures of inequity and blue for lowest measures of inequity

Fourth Plain

Fourth Plain was developed through the Vancouver Housing Authority during WWII to house the incoming wartime workforce employed in the Kaiser shipyard. Although most of the thousands of black emigrants left the neighborhood following the war's end the neighborhood retained its character as a multicultural community. The Fourth Plain Neighborhood is spatially defined by the area surrounding Fourth Plain Corridor between I-5 and I-205, although subareas have been defined through the Fourth Plain for All (eastern), and Fourth Plain Forward (western). Both have high BIPOC percentages and experience similar concerns particularly low incomes, and low rates of homeownership (see Appendix). In addition, Fourth Plain was identified to have higher displacement risk than other areas of the city – a very critical concern for BIPOC residents.

We are likely to see the Fourth Plain neighborhood densify in the future, supported through the Comprehensive Plan. Much of the corridor will become either Mixed Use or Regional Activity and see significant growth and development. As such, policy should work to mitigate any RDI and any displacement pressures that could result from the new developments.

Targeted Policies:

- Community Investment Trusts – Work with Mercy Corps or another NPO to facilitate community buy-in for a CIT; a program that allows community members to invest in participating local small businesses a minimum of $10 per month and receive a dividend of profits. (Reside Vancouver)
  - *Why?* One of Fourth Plain's biggest strengths is its local economy, particularly its small businesses. These employ and are operated by neighborhood residents and cycle money back into the local economy. Supporting these small businesses supports that local economy and builds pride and stewardship.
- Down Payment Assistance Loan – Create a program that provides loans for qualified low-income households (in certain neighborhoods) with low-interest rates (and loan forgiveness for long-term tenure).
  - *Why?* Fourth Plain has very low rates of owner-occupied housing, with census tracts scoring as low as 4.2% (ACS 2022, Tract ID 411.11) and all within the lowest quintile for the county (36.9%). Homeownership allows for local wealth generation, improved housing security, and often improved affordability.
- Ensuring a Variety of Housing Types - Encourage new and innovative housing types that meet the evolving needs of our households and expand housing choices in all neighborhoods. These include: SFR; MFR; Middle housing; ADU; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.
  - *Why?* Allowing for and encouraging the development of a breadth of housing types for all kinds of households, including multi-generational; and increasing opportunities for smaller, denser, and more affordable housing options.
- Affordable Housing Replacement – Redevelopment projects are required to, at a minimum, match the number of housing units lost with units maintained at an affordable level.

- *Why?* This neighborhood is likely to experience a great deal of redevelopment that may displace households. By ensuring that no affordable rate housing is lost helps prevent displacement and gentrification.

❖ Relocation Assistance (Right to Return) – When relocation is unavoidable determine who is the most likely harmed community and ensure that community is protected from further displacement. Support relocation assistance including the development of replacement housing and prioritize displaced households for new housing.
- *Why?* All the Fourth Plain Area appears on the Displacement Risk Index within the categories of Susceptible, Early: Type 2, and Dynamic. These categories indicate that it is at risk for or presently ongoing displacement.

❖ Mixed Use TOD – Encouraging Mixed-Use Development along transit corridors to encourage connected and accessible neighborhood design housing, employment, and amenities within easy access to transit.
- *Why?* Fourth Plain Neighborhood is already well supported through public transit; Fourth Plain Blvd is a key transit corridor for BRT and standard bus routes. By directing mixed-use development along transit creates a community that is connected, accessible, and car optional.

❖ Density in Multimodal Areas – Direct high-density development to areas with existing development where the terrain is conducive to walking, bicycling and transit use and where sensitive drainage basins will not be impacted.
- Why? Fourth Plain already represents a neighborhood well suited for walking, biking, and public transit with a variety of land uses and amenities. Promoting density in those areas promotes connectivity, accessibility, and healthy.

❖ Development Code for Air Quality – Recognizing that locating density and affordable housing along major transportation corridors incurs air quality health impacts; development code will be updated to conform to best practices for indoor air quality.
- *Why?* Transportation corridors are well suited for densifying and affordable housing due improved connectivity and accessibility. Locating affordable housing along these transportation corridors can put socioeconomically vulnerable communities including racial groups at higher exposures to poor air quality.

Fruit Valley

The Fruit Valley Neighborhood is on the Western Edge of Vancouver and is characterized presently by a mixture of uses including Industrial, Agricultural, Residential, and Open Space. As its name suggests it was historically valued for prosperous fruit and nut orchards. Presently, however, it has become dominated by larger industrial operations including the Port of Vancouver or preserved as Open Space (Vancouver Lake). Its relatively small population of 2,732 has remained working class dominated, and increasingly Hispanic/Latino at 32% (2022 ACS Census).

The Fruit Valley Neighborhood is not likely to experience significant growth pressures, as it is relatively disconnected from the rest of the city and proximity to industrial land uses. This reduces displacement risk from redevelopment, but present RDI's should be mitigated for.

Targeted Policies:

- Affordable Housing – Retaining existing affordable housing by utilizing deed restrictions and density bonuses to incentivize and secure housing affordability and provide new homeownership opportunities for residents with low incomes.
  - *Why?* Fruit Valley presently has relatively affordable housing (median rent $914, median owner-occupied cost $1,322). (ACS 2022) Keeping the neighborhood's affordable housing help prevent displacement and RDI pressures.
- Limited Equity Cooperative – MFR and MHP can transition into a cooperative ownership structure where residents own shares of the community. Rents are restricted to affordable rates, and profits distributed among residents/shareholders. Example communities: Lakeside Mobile Estates, Fruit Valley Condos, Plum Meadows, and Fruit Valley Commons
  - *Why?* A limited equity cooperative would lock-in these communities as stable housing resistant to redevelopment, affordable, and returning profits to the residents as passive income. All of which would help bring down Fruit Valley's very high Cost-burden Ratio (Median Rent/Median HH Income) of 38.2.
- Streetscape Improvements for Developers – Require developers to make improvements to their street frontage or pay fees supporting toward local streetscape improvements in the neighborhood.
  - *Why?* The Fruit Valley Neighborhood scores poorly for walkability/bike-ability/public transit. Secondly, streetscape design can improve safety, and lead to future investment in this neighborhood.



Image shows Walkscores in Fruit Valley Neighborhood/ Walkscore: 18, Transit Score 27, Bike Score 53. *Source:*. *Walkscore*

- Public Transit Improvements – City should budget for improvements and new public transit routes in Fruit Valley.
  - *Why?* Fruit Valley scores very low (27) for transit access, according to Walkscore due to its limited transit service. Fruit Valley only has one bus route (Route 6) at a 30-minute service frequency along its border with Downtown.

North Cascade Park

Mill Plain is Vancouver's other primary east-west arterial, and historically presenting the connection between the fort and lumber and grist mills upriver. Mill Plain in Central Vancouver is categorized by low density residential and institutional land use while east of I-205 transitions into more commercial and high density residential. This eastern segment is of higher equity and RDI concern, particularly the Cascade Park neighborhoods, census tracts 413.22 and 413.23. These have higher rates of BIPOC population alongside RDI concerns like housing cost-burden

(between .30 and .362), high rates of poverty, low median household income, and low homeownership rates (see Appendix).

The comprehensive plan will likely see this neighborhood experiencing a densification, with some properties redeveloping into much larger scale mixed use and multi-family housing. Crucially census tracts in this neighborhood were categorized as dynamic on the Displacement Risk Map, indicating they are actively ongoing displacement; with increasing home values and a decreasing BIPOC population. As redevelopment occurs, policy needs to ensure that housing remains affordable, and residents are not displaced.

Targeted Policies:

- Community Land Trust – Facilitate the creation of a Community Land Trust; a NPO to purchase and resell properties providing affordable housing to buyers who agree to retain as affordable housing or first-time home buyers as their primary residence at an affordable cost. (Reside Vancouver)
  - *Why?* This policy would allow the CLT to purchase the property and sell to developers who make some agreements to keep the created housing affordable.
- Right of First Refusal – When a property is listed for sale, provide opportunity for the tenant (if applicable) and Community Land Trust (if applicable) to purchase at market rate before the property is listed on the open market or sold private party. (Reside Vancouver)
  - *Why?* This policy would support the CLT and its ability to function, promoting affordability; and providing the opportunity for the tenant to remain in-place.
- Relocation Assistance (Right to Return) – When relocation is unavoidable determine who is the most likely harmed community and ensure that community is protected from further displacement. Support relocation assistance including the development of replacement housing and prioritize displaced households for new housing.
  - *Why?* North Cascade Park was categorized as Dynamic according to the Displacement Risk Analysis. This means that the area has a socially vulnerable population, has increasing home values, and has seen a shift toward less BIPOC population in the last few years. Displacement is ongoing; therefore this kind of policy can help keep socioeconomically vulnerable and BIPOC residents, within the neighborhood.
- Affordable Housing Replacement – Require developers to provide affordable housing for the number of housing units lost through the development.
  - *Why?* The neighborhood has relatively low household incomes and are cost-burdened by housing (>30%). Developing housing set to an affordable level will mitigate for high housing costs compared to income.
- Neighborhood Livability – Maintain and facilitate development of stable, multi-use neighborhoods that contain a compatible mix of housing, jobs, stores, and open and public spaces in a well-planned, safe pedestrian environment.
  - *Why?* Mixing land use, housing, and amenities help create a connected and accessible community, well suited for North Cascade Park's high development potential.

Central Vancouver Heights & Northwood

The Vancouver Heights is a historic neighborhood in the city's core, it was developed through the Vancouver Housing Authority providing homes for wartime workers, then redeveloped after the war's end as single family residential neighborhoods. Neighborhoods created during the after war redevelopment were modest, relatively affordable, on smaller lots, and attracted predominantly white working-class residents. It remains single family residential, with much of the original housing stock remaining.

Vancouver Heights falls into three census tracts separated by Andresen, and again by North Garrison Rd/Morrison Rd. Each census tract performs very differently to one another on racial distribution and RDI measurements. Of the three only the middle- Tract 430, presents a concern for RDI. The central neighborhood is more racially diverse, is more cost-burdened by housing at .307, and broadly performs worse for RDI measurements. Importantly, this neighborhood, as discussed in the following chapter was surrounded by neighborhoods like East and West Vancouver Heights and Father Blanchet Park that utilized racially restrictive covenants during the 30s-50s, leading to this as the only neighborhood in the area, allowing BIPOC residents to buy.

- *Note: The Vancouver Heights District, located in the Westernmost edge of Vancouver Heights is undergoing a planned redevelopment project, focused on improving housing affordability and creating a mixed-use neighborhood center.*

Targeted Policies:

- Down Payment Assistance Loan – Create a program that provides loans for qualified low-income households (in certain neighborhoods) with low-interest rates (and loan forgiveness for long-term tenure).
  - *Why?* This creates opportunities for eligible socially vulnerable households including BIPOC to better buy a home without being cost-burdened.
- Ensuring a Variety of Housing Types - Encourage new and innovative housing types that meet the evolving needs of our households and expand housing choices in all neighborhoods. These include: SFR; MFR; Middle housing; ADU; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.
  - *Why?* Presently the neighborhood is almost entirely single family residential, attracting only those who can afford to pay for those associated higher housing costs and utilize all the space SFR provides. By diversifying the kinds of housing available in this neighborhood diversifies its residents, allows for generational housing, and affordability.

Rose Village

The Rose Village neighborhood is defined by the areas bounded by I-5, SR-500 and St Johns. Its close proximity to downtown, the oldest part of the city, meant that Rose Village was one of the first places to develop, along with Forth Plain the neighborhood experienced the levels of development of housing for wartime industries.

Today, the neighborhood is home to many older residents who have lived here for decades, as well as first time buyers who appreciate the quality craftsmanship of an older home, the affordability of a smaller lot and structure, and the proximity to downtown and I-5. Overtime, zoning changes have allowed the neighborhood to develop duplexes and apartments along Fourth Plain and St Johns corridors. It is racially diverse with 32% BIPOC excluding Asian, lower median household income and Highest Equity Risk and Early: Type 1 Displacement Risk.

Targeted Policies:

- Community Land Trust – Facilitate the creation of a Community Land Trust; a NPO to purchase and resell properties providing affordable housing to buyers who agree to retain as affordable housing or first-time home buyers as their primary residence at an affordable cost.
  - *Why?* Due to the neighborhoods displacement risk score, Early: Type 1, policies should work to ensure that any redevelopment pressures prioritize the existing residents
- Right of First Refusal – When a property is listed for sale, provide opportunity for the tenant (if applicable) and Community Land Trust (if applicable) to purchase at market rate before the property is listed on the open market or sold private party.
  - *Why?* This policy would support the CLT and its ability to function, promoting affordability; and providing the opportunity for the tenant to remain in-place.
- Multi-generational Housing – Encourage multi-generational housing through density increases and design culturally tailored to multi-generational households including, single-story (no-steps) design, flexible floorplans, ADU, and connected and accessible community guidelines.
  - Why? To better encourage a mixing in household types including variety of ages policies should facilitate housing styles that allow for aging in place, and all stages of life.

6. De-Segregating White Dominant Neighborhoods

Historic Precedents

These present racial disparities and racial distribution are influenced by historic racial housing inequities. BIPOC groups were excluded from buying housing in Vancouver directly through racial deed restrictions (CCRs), and indirectly through a lack of access to mortgage assistance offered through the Veterans Affairs (VA). The strongest indicators of racist housing policy leading to geographic disparities are from historic deed restrictions.

Presently, decades after racist housing policy were in-place in Vancouver, there are still patterns of racial segregation that line-up with racist housing policy geographically. Thankfully, unlike its larger neighbors, Seattle and Portland with a history of Redlining, Vancouver's only significant spatially disparate racial housing policy is Racial Covenants, Conditions, and Restrictions (CCRs).

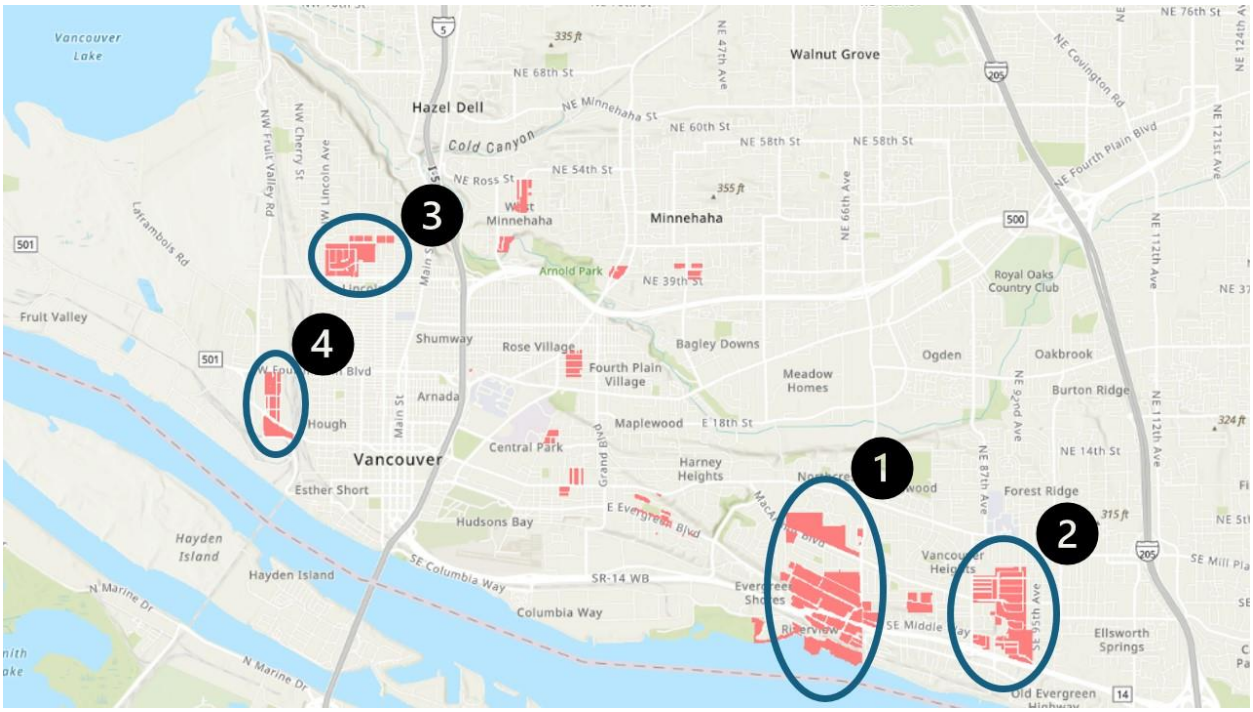


Image: Parcels with CCR's within Clark County identified through Racial Restrictive Covenants Project grouped into 4 categories. *Source: Washington State, University of Washington*

As previously discussed in Chapter 1: Data and Historic Precedent Indicating RDI, racially restrictive deeds, were legally binding rules restricting the sale of properties to only white or "non-colored" individuals and households, prevalent during the 1930-50s. Properties within Clark County that were subject to racial CCR's are shown in the above map image, most of which fall within City Boundaries. There are clear geographic trends resulting from large subdivisions with racial restrictions. Four neighborhoods across the city were identified to have a large number of parcels with a history of racial CCRs.

Racial Integration Neighborhoods

1. Evergreen Highlands & Northcrest (Tract 429)
2. Eastern Vancouver Heights (Tract 431)
3. Southern Lincoln (Tract 420)
4. Simpson Ave – Southeastern Fruit Valley (Tract 410.05) – Excluded

Racial segregation caused by racial CCR's has lasting impacts on race/ethnicity demographic distribution across the city. For instance, Evergreen Highlands Neighborhood and Eastern Vancouver Heights in the city's south-central area. Census Tracts in these neighborhoods have very low BIPOC (excluding Asian) population share at around 12 and 13%, much lower than the county average of 20%. The Simpson Avenue neighborhood presents an exception as the neighborhood has a high share of Hispanic/latino residents at 21%, as such it is excluded for further consideration for integration policy.

These neighborhoods generally score well on RDI and equity matrices, as demonstrated by mapping results shown in the Spatial Data Appendix. A summary of those results are as follows:

- Equity Index
  - All CCR neighborhoods had a **Low and Lowest Equity Index** score
- Displacement Risk
  - All CCR neighborhoods had a **low displacement risk** (didn't appear on Displacement Risk Index)
- Homeownership
  - All CCR neighborhoods have a **high 67-84% homeownership rate**
- Cost Burden (Housing Cost/Household Income)
  - The neighborhoods have a 25-30 ratio, which is **moderate cost-burden ratio** below the cost-burden threshold of 30
- Poverty
  - CCR Neighborhoods poverty ratios varied widely from **8.6 - 13.5% in Eastern Vancouver Heights, to Southern Lincoln at 13.5-20%***
    **Likely due to a proximity to downtown, which all score similarly*
- Median Household Income
  - CCR neighborhoods have **moderate median household income** ranging from $93,000 - 113,000, similar to the County's median of $97,700
- Education
  - CCR neighborhoods have **moderate-high educational attainment** of 34-43% of the population 25 and older receiving a bachelor's degree or higher

In general these CCR neighborhoods perform average to above average according to these indices. They have strong homeownership rates and educational attainment and score well in the equity index and displacement risk indeces. However, these neighborhoods still have housing security concerns with lower incomes and in some instances povery, both of which tie-into having a moderate-high housing cost burden. Certain policies supporting these concerns can help these neighborhoods reduce historic impacts for housing segregation.

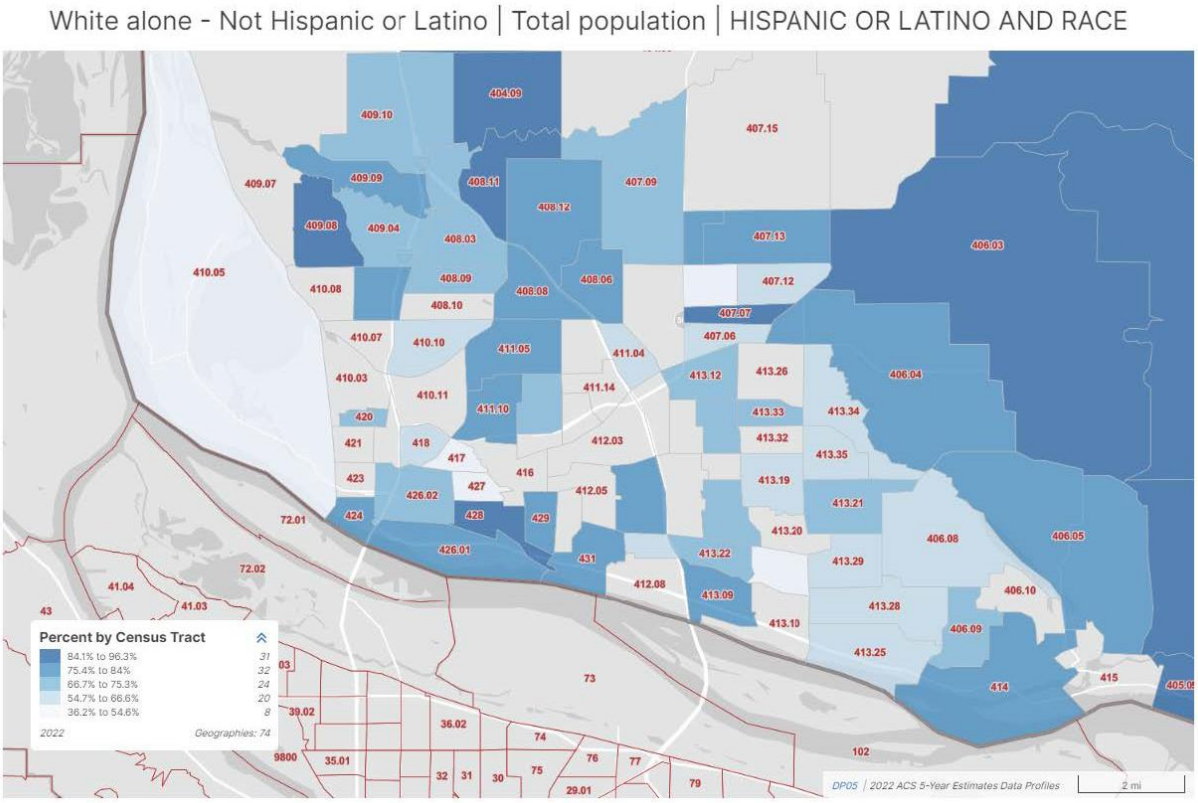
Policies that can be effective at addressing these formerly racial CCR neighborhoods include many of the common policies used to improve housing affordability, choice, and land-use mixing and cohesion. These include:

1) **Housing Affordability** - requires or incentivizes developers to include affordable housing units within new market-rate housing developments.
2) **Housing Vouchers** - enable low-income families to move into higher-opportunity neighborhoods, breaking up concentrations of racial and economic segregation.
3) **Flexibility in Housing Type** - support the creation of a variety of housing types, with specific focus on increasing density, and providing for “missing middle housing” such as townhomes, duplex, triplex, etc., village clusters, and others.
4) **Land Use Mixing** - through multiple small zoning districts or mixed-use zoning can a neighborhood that is more connected and accessible and provides opportunities for employment.

Spatial Data Appendix

Non-Hispanic/Latino White as Percent of Population

This map shows census tracts across Vancouver based on the share of the population that is White and Not Hispanic/Latino. Examining where the percentages are low shows the areas that are less racially diverse or have a larger BIPOC share of the population.

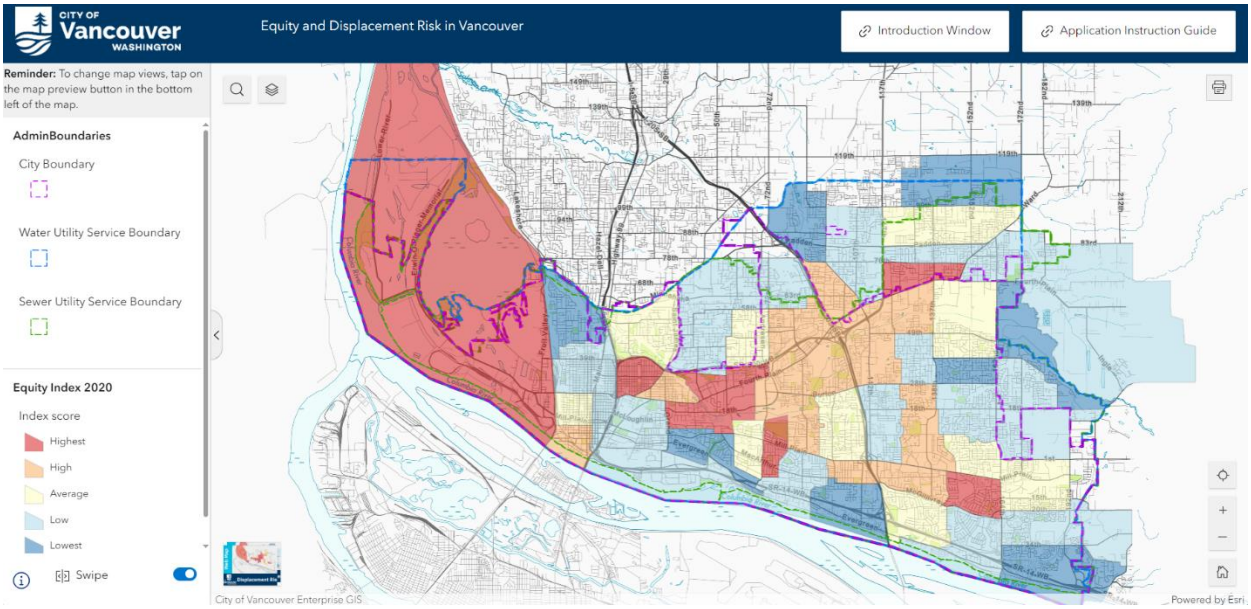


Source: US Census, 5-year ACS, DP05 – Hispanic or Latino and Race

The stand-out areas for having a high BIPOC population includes Fruit Valley, North Main, Fruit Valley, Fourth Plain Corridor, Central Vancouver Heights, East Cascade Park, and other areas. Although this may doesn't pull out specific racial groups, data indicates that East Vancouver has more Asian population, a BIPOC group that according to RDI indicator data, doesn't experience negative impacts in the same way as other racial groups.

Equity Index

The City of Vancouver has prepared an equity index that identifies equity priority communities based on a set of standard social vulnerability/equity indicators from the ACS Census. These indicators included renter/owner rates, race/ethnicity, English proficiency, education, income, disability, and age. This analysis indexed these together and compared to all census block group in the city. Many of these variables are common RDI categories when paired with a BIPOC dominant community.

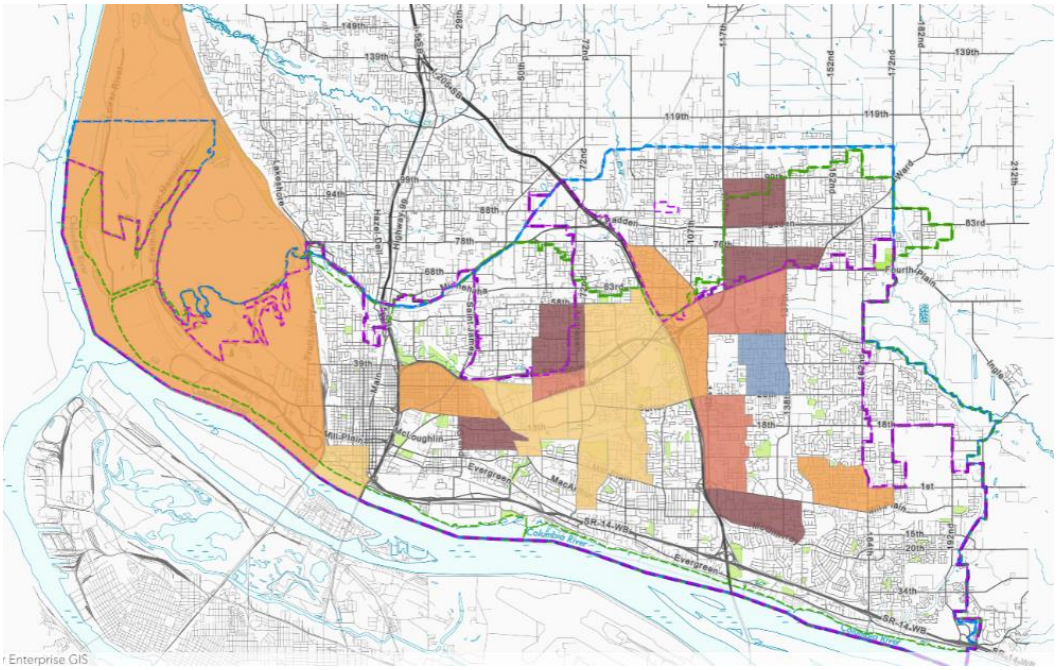


Source: Equity and Displacement Risk in Vancouver (Equity Index Map), City of Vancouver, 2024

The areas of the city in the highest index category according to the equity index are Fruit Valley, Rose Village, Harney Heights, and Cascade Highlands (East Mill Plain), and the whole Fourth Plain Corridor has equity index scores high or highest.

Displacement Risk Index

Alongside the Equity Index, the City prepared the Displacement Risk Index to identify which census tracts are at a higher risk or actively ongoing displacement. This was created through examining socioeconomic vulnerability, areas of increasing home values, and changing racial/ethnic compositions.



Source: Displacement Risk Map (Equity and Displacement in Vancouver), City of Vancouver 2024

Table 4. Displacement Risk Categories

Typology	Vulnerable population?	Demographic change?	Housing market condition
Susceptible	Yes	No	Adjacent
Early: Type 1	Yes	No	Accelerating
Early: Type 2	Yes	Yes	Adjacent
Dynamic	Yes	Yes	Accelerating
Late: Type 1	Yes	Yes	Appreciating
Late: Type 2	Used to be in 2000	Yes	Accelerating
Continued loss	Used to be in 2000	Increasing share of white people and adults with four-year degree	Appreciating

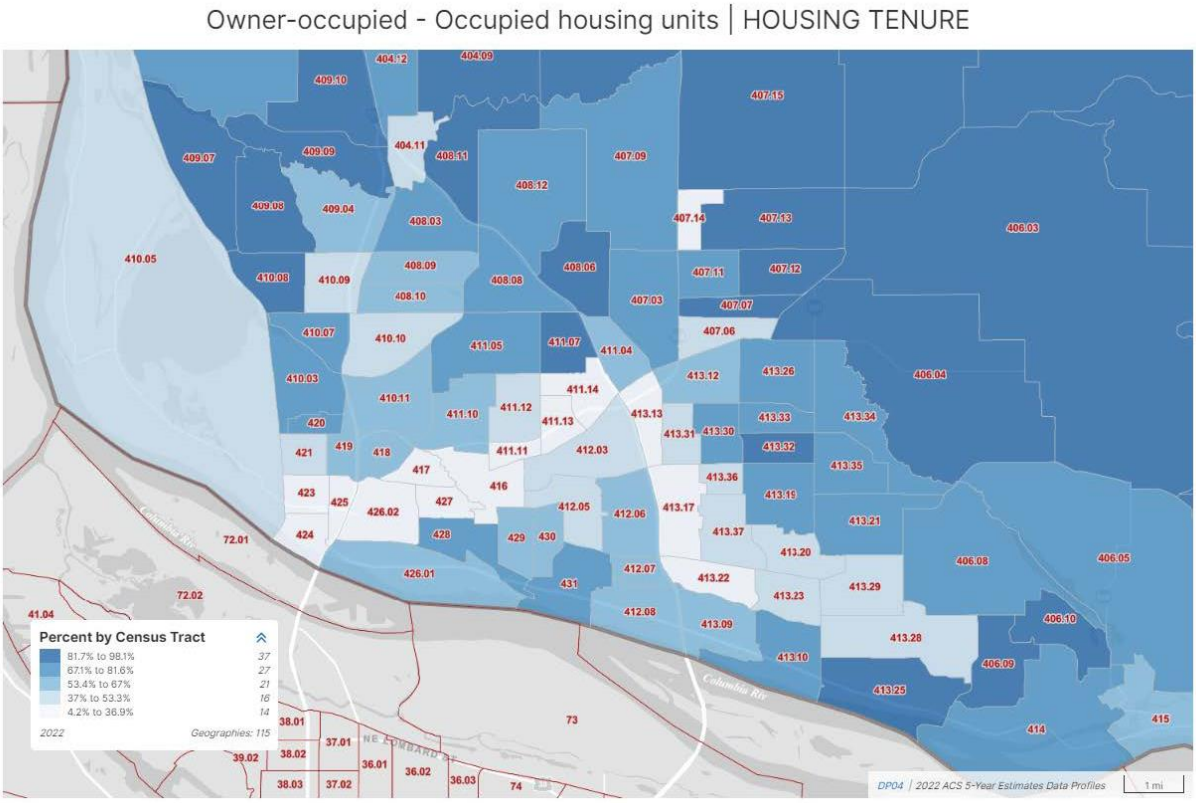
Source: Displacement Risk Methodology, City of Vancouver, 2022

There are a few key results from this analysis:

- Fruit Valley – Early: Type 2
- Fourth Plain (I-5 to 205)– Susceptible and Early: Type 1, Dynamic
- Fourth Plain (East of I-205): Early Type 1 or 2, Dynamic
- Mill Plain (East of I-205): Dynamic
- Hudson Bay: Dynamic
- North Andresen: Dynamic

Homeownership

One of the strongest observed differences between racial groups socioeconomic status' are their ability to own their housing. The Equity Analysis found that BIPOC (excluding Asian) city residents are more likely to rent instead of own their housing, with homeownership rates between 26-31%, compared to the city's average of 51%. (EA)



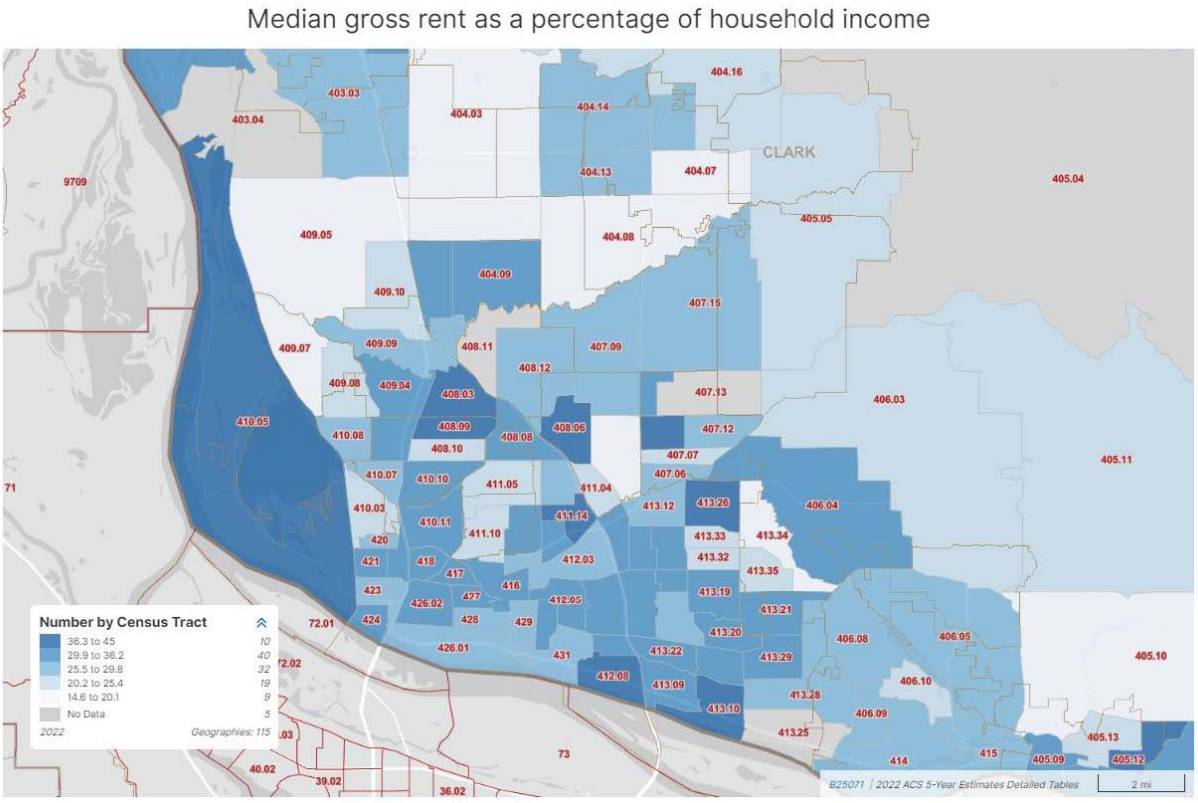
Source: US Census, 5-year ACS, DP04 – Owner-occupied housing, 2022

Spatially we see lower rates of homeownership along the Fourth Plain Corridor, East Mill Plain, Fruit Valley, and St John's Neighborhoods. There are also low rates of homeownership Downtown but those can be explained more by residents housing choice and land value and densities. This lack of homeownership observed is likely a result of present disparities in income and wealth, which in turn may be tied to differences in educational attainment and other factors examined in the Appendix.

Housing Cost Burden

One useful RDI consideration that captures components of both income and housing costs is Housing Cost Burden. Cost burdened by housing is defined as spending over 30% of the household income on housing. Households who are cost burdened by housing are more likely to experience displacement risk or housing insecurity.

On the following Census map the highest two categories both fall within that category (darkest two shades of blue).

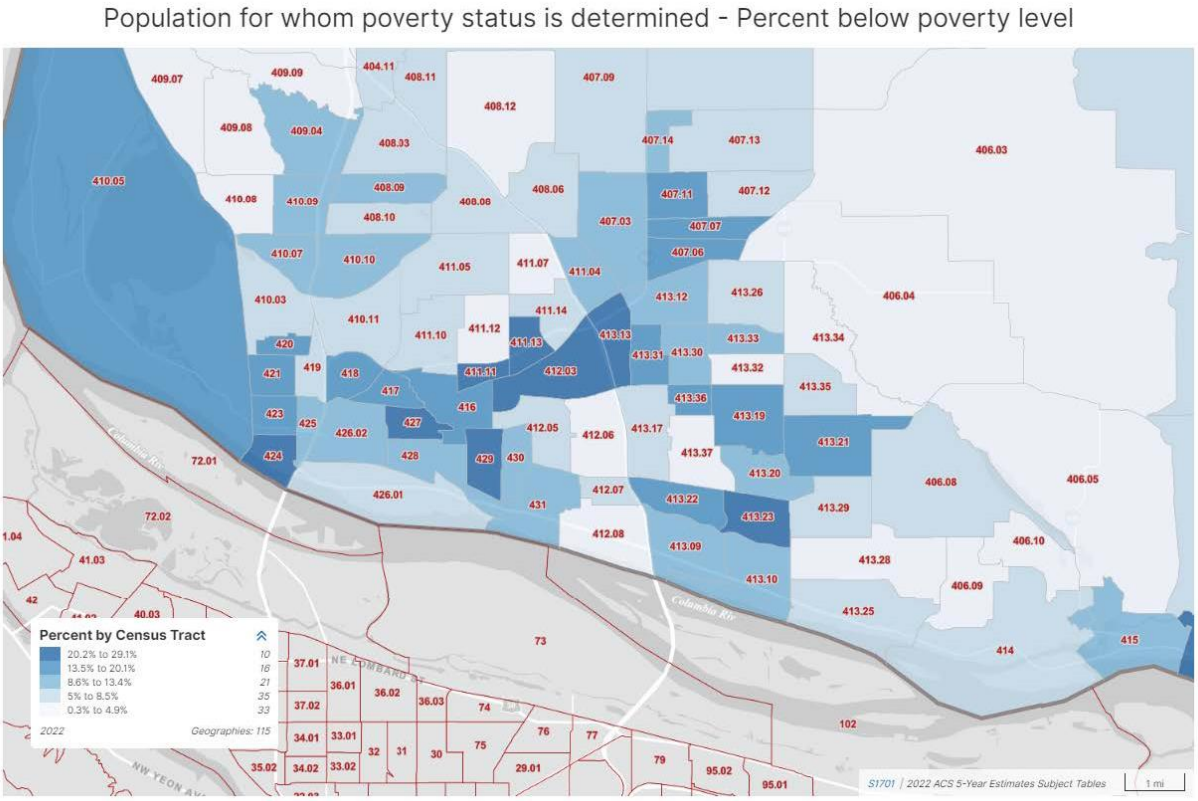


Source: US Census, 5-year ACS, B25071 – Median Gross Rent as a Percentage of Household income, 2022

The spread of median gross rent as a percentage of household income is distributed relatively evenly across the city, however there are a few trends identified through this map. Neighborhoods with the highest ration of median rent to median household income include:

1. Fruit Valley
2. Along the East side of i-5 (West Minnehaha and Central Park neighborhood)
3. East Millplain and SR-14 neighborhoods

Poverty

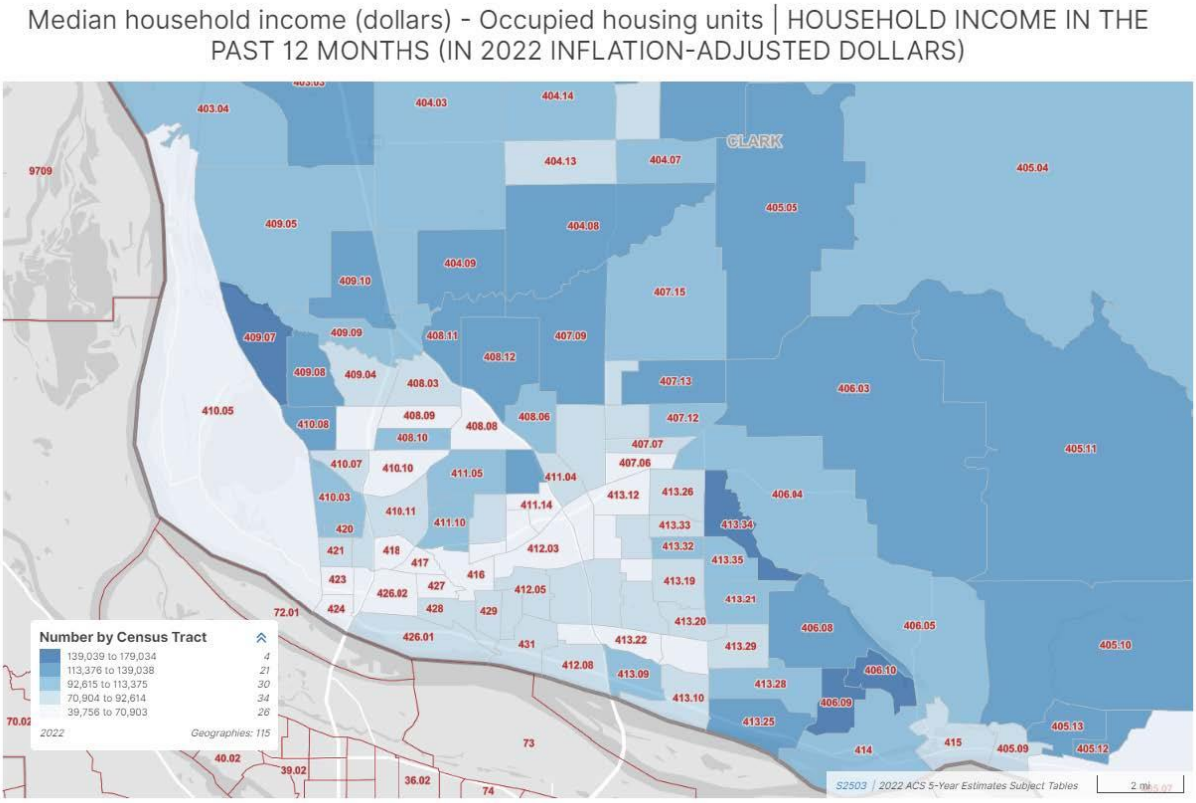


Source: US Census, 5-year ACS, S1701 – Poverty Status in the Past 12-months, 2022

Poverty in Vancouver demonstrates an unequal distribution, focusing on specific areas following these trends:

- Highest rates of poverty (20-30%) are along the Fourth Plain Corridor just west of I-205, Downtown, The Heights, and East Millplain.
- High poverty rates (13.5-20%) are in East Fourth Plain, Upper Main, and Fruit Valley.

Median Household Income

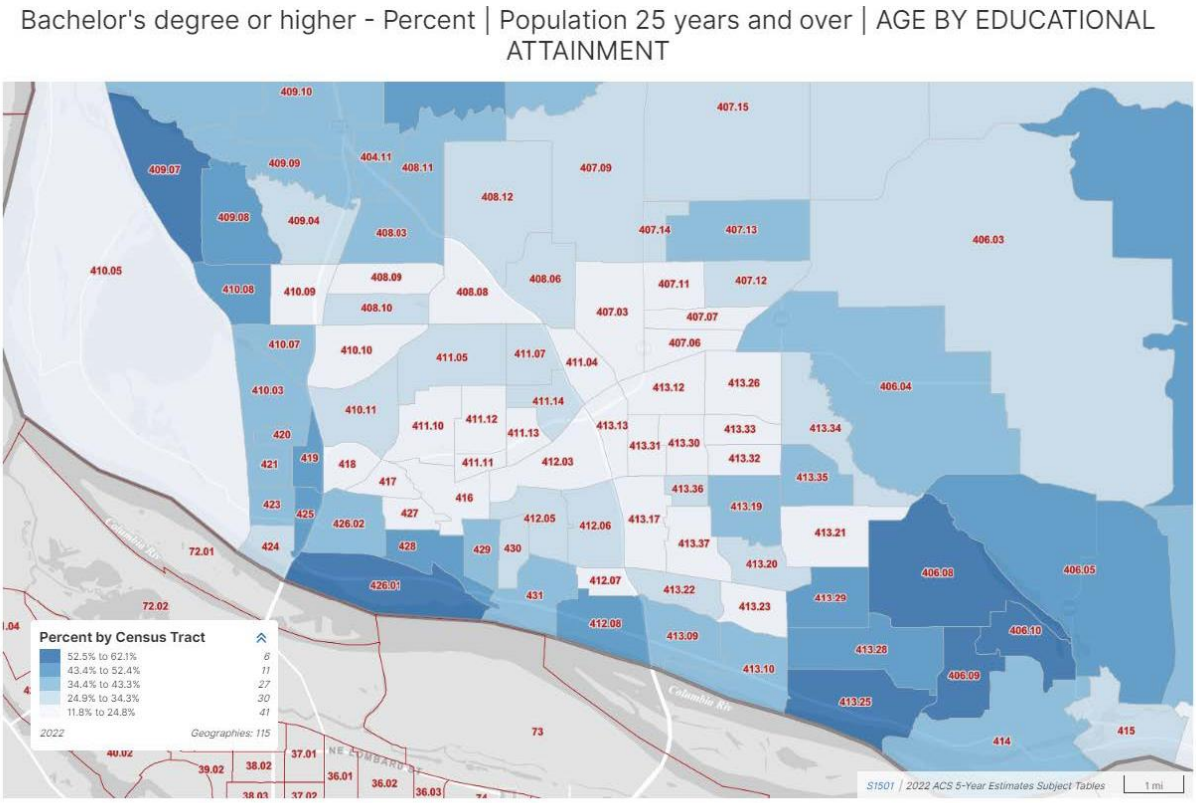


Source: US Census, 5-year ACS, S2503 – Household Income in the Past 12 Months, 2022

Median household income demonstrates a similar (but inverse) pattern to poverty. Income is another useful measure of RDI, as income often lines up with racial/ethnic populations.

There is a distinct band of census tracts with a low median household income following the Fourth Plain Corridor, Downtown, and Fruit Valley, and pockets of low-income in the Heights District, Rose Village, and West Minnehaha. For reference the county's median household income is $97,678.

Educational Attainment



Source: US Census, 5-year ACS, S1501 – Educational Attainment (Bachelors Degree of Higher for 25 years and older population), 2022

Populations with a low percentage of bachelor's degree or higher for age 25 or higher are more likely to have lower median income and insecure employment. There are obvious trends in the areas of the city with the lowest educational attainment. For instance, the areas in the city's core (fourth plain corridor, East Mill Plain, and St. Johns/St. James) and Fruit Valley have lower percentages of higher education attainment.

OUR VANCOUVER

OUR FUTURE 2045



CLIMATE VULNERABILITY ASSESSMENT

Prepared by: BERK Consulting, Inc.

Date: September 2025

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1. Summary and Introduction

Purpose

The Pacific Northwest including Vancouver is experiencing extreme heat, drought, extreme precipitation, flooding, and exposure to wildfires, especially smoke. These climate impacts affect Vancouver's people, places, and infrastructure.

This Vancouver Climate Vulnerability Assessment report supports the **OUR VANCOUVER 2045 COMPREHENSIVE PLAN** periodic update. In particular, it informs the development of the resilience sub-element of the newly required climate change and resilience element under HB 1181. Vancouver anticipates an integrated element addressing "Climate, Environment, Community Health, Sustainability and Resiliency."

Scope and Context

This vulnerability assessment considers the Washington Department of Commerce *Climate Element Planning Guidance*, December 2023, and evaluates the potential for climate exposure to community assets as well as potential health and environmental sensitivities to climate change impacts. The capacity of Vancouver's people, places, and infrastructure to adapt to climate change is also addressed, along with potential strategies to enhance Vancouver's adaptive capacity.

The chapters of the report include:

1. Summary and Introduction
2. Climate Change in Vancouver
3. Residents Vulnerable to Climate Change Impacts
4. Planning for Climate Change
5. Vulnerability & Risk Assessment

This Chapter 1 Summary and Introduction provides an overview of findings of the report. Chapter 2 describes climate change trends that affect Vancouver and Clark County. Chapter 3 describes residents with socioeconomic or health conditions or disparities that are potentially vulnerable to climate change impacts. Chapter 4 describes Vancouver's plans, strategies, and related initiatives addressing climate adaptation and mitigation. Chapter 5 evaluates vulnerability and risk through eleven sectors including:

- Agriculture and Food Systems
- Buildings & Energy
- Cultural Resources & Practices

- Economic Development
- Emergency Management
- Health & Well-being
- Ecosystems
- Transportation
- Waste Management
- Water Resources
- Zoning & Development

This report builds on Vancouver's extensive work to address climate change mitigation and adaptation, including, but not limited to:

- Vancouver Climate Action Framework (2022)
- Vancouver Climate Adaptation Strategy (2022)
- Vancouver 2023 Inventory of Community and Government Operations Greenhouse Gas (GHG) Emissions (2024)
- Vancouver Equity Index (2022)
- Reside Vancouver An Anti-Displacement Plan (2023)
- Clark Regional Natural Hazard Mitigation Plan: Volume 2—Planning Partner Annexes, Vancouver Annex (2023)

In addition to this vulnerability assessment, related work is underway to address other aspects of the pending "Climate, Environment, Community Health, Sustainability and Resiliency Element" including:

- **Climate Resilience Policy Evaluation**: Audits policies and

DEFINITIONS

Adaptive Capacity: The ability of a person, asset, or system to adjust to a hazard, take advantage of new opportunities, or cope with change.

Assets: People, resources, ecosystems, infrastructure, and the services they provide. Assets are the tangible and intangible things people or communities value.

Climate Change: A change in the average weather patterns such as temperature and rainfall in a region over a long period of time.

Climate Resilience: The ongoing process of anticipating, preparing for, and adapting to changes in climate and minimizing negative impacts to our natural systems, infrastructure, and communities.

Exposure: The presence of people, assets, and ecosystems in places where they could be adversely affected by hazards.

Impacts: Effects on natural and human systems that result from hazards. Evaluating potential impacts is a critical step in assessing vulnerability.

Overburdened Community: A geographic area where vulnerable populations face combined, multiple environmental harms and health impacts, and includes, but is not limited to, highly impacted communities as defined in RCW 19.405.020.

Sensitivity: The degree to which a system, population, or resource is or might be affected by hazards.

Vulnerability: The propensity or predisposition of assets to be adversely affected by hazards. Vulnerability encompasses exposure, sensitivity, potential impacts, and adaptive capacity.

(Commerce, 2023) (US Climate Resilience Toolkit. 2021) (NASA. 2024)

provides recommendations to amend or add policies.

- **Climate Mitigation:** Implementing the City's Climate Action Framework, the City has inventoried GHG emissions and will use a similar approach to evaluate Vancouver's growth strategies called "land use possibilities." The City is also reviewing vehicle miles traveled (VMT) reduction through active trip potential.
- **Environment:** An Environmental Impact Statement is evaluating Vancouver 2045 Land Use Possibilities.
- **Health:** A Health Impact Assessment of the Vancouver 2045 land use possibilities has been developed to evaluate the Periodic Update land use possibilities and other policy issues.

Climate Impacts in Vancouver

Vancouver is feeling the effects of climate change including the following Pacific Northwest trends (Chang, 2023):

- **Warming and Extreme Heat:** The annual number of extremely hot days and warm nights in the Northwest has been above the long-term average over the past decade, and the annual number of extremely cold nights over the same period has been below the long-term average. Future warming in the region is expected to exacerbate regional heatwave intensities. It is particularly magnified on impervious areas in urban areas like Vancouver.
- **Extreme Precipitation Events:** The frequency and intensity of extreme precipitation events are projected to increase across the region. A greater number of strong atmospheric events and fewer moderate and weak events are projected to occur and are projected to reach farther inland. In Vancouver, major flooding along rivers and streams is less likely due to flood control structures and greenways but there is a risk along the Port and other areas that are low lying, and there is a risk of urban flooding elsewhere.
- **Flooding and Infrastructure:** Riverine flooding as well as localized urban flooding is a growing concern in Vancouver due to aging stormwater infrastructure, particularly in older neighborhoods with combined sewer systems. These systems are increasingly overwhelmed by intense rainfall events, leading to surface flooding and sewer overflows.
- **Decreasing Summer Precipitation and Increasing Drought:** Summer precipitation is projected to decline. Observed lower stream flows in summer are expected to decrease. This could affect fish and other aquatic life in Vancouvers streams.
- **Increasing Wildfire Likelihood and Smoke:** An increase in wildfires in the Pacific Northwest could expose people in Vancouver and the broader region to more wildfire smoke. Increased wildfire smoke events are straining indoor air quality in public facilities. Many community centers and senior centers lack adequate HVAC systems or filtration, limiting their ability to serve as clean air shelters during smoke events.

See Chapter 2 Climate Change in Vancouver for additional information about climate impacts in Vancouver.

Climate Vulnerability Index

Vancouver also developed a Climate Vulnerability Index (CVI) in parallel with this assessment to evaluate over 30 indicators of climate vulnerability, scaled to US Census block groups, to identify areas and populations more vulnerable to extreme heat, flooding and extreme precipitation, and air quality/smoke. The CVI allows Vancouver to compare areas within the city to itself. The CVI does not compare Vancouver to other areas across the county or state.

Vulnerability is defined as the sum of exposure to climate shocks and stresses, the sensitivity of people or environment to the shock, and the capacity of the community and place to cope with consequences of the climate event. (UKAID, 2011) (US Climate Resilience Toolkit, 2021)

Vulnerability = Exposure + Sensitivity - Capacity to Adapt

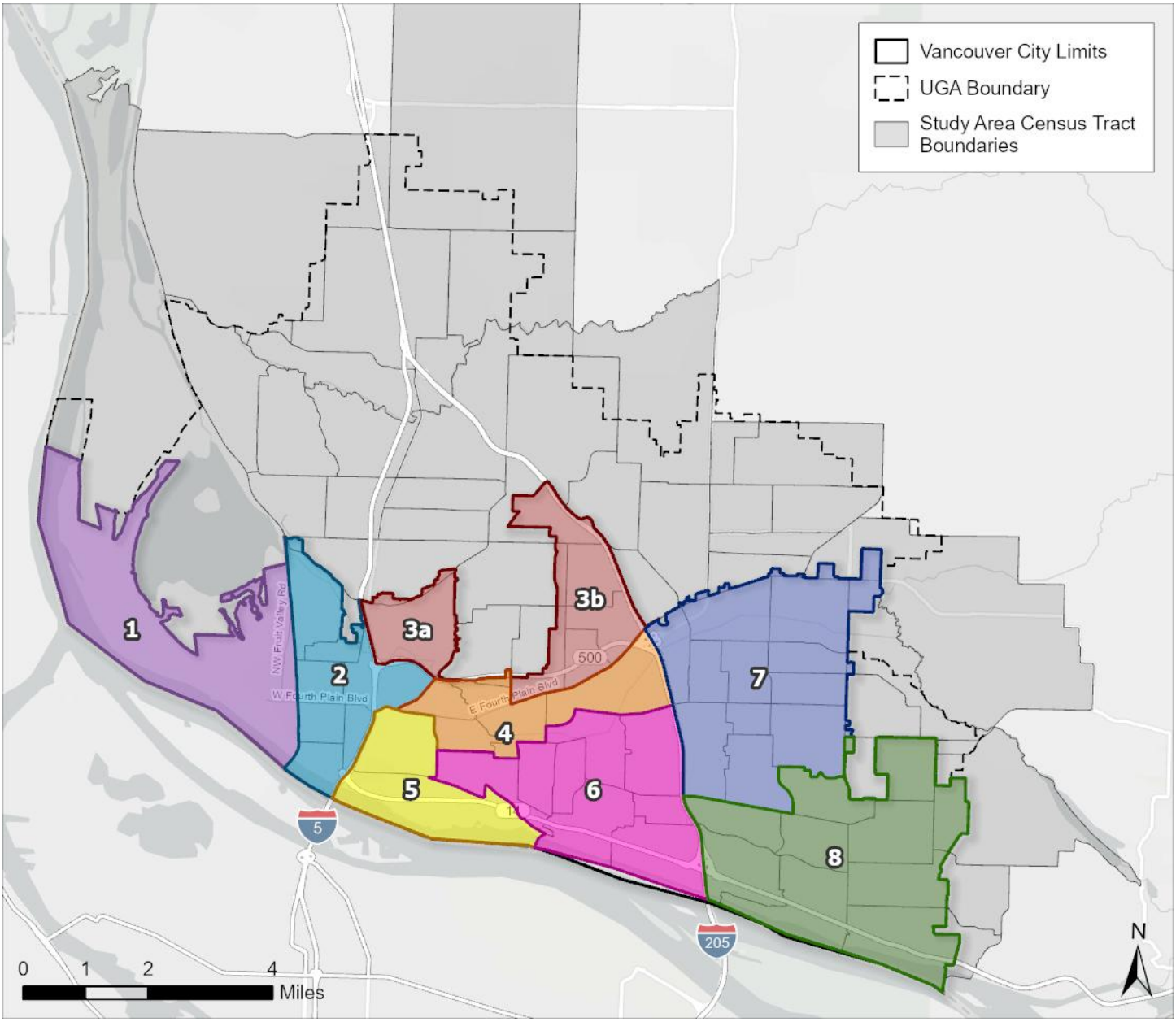
The Vancouver CVI presents a series of indices and bivariate intersections including Vancouver's first index regarding Climate Exposure. The CVI includes a bivariate view of Exposure in relation to the City's Equity and Displacement indices which have elements of sensitivity and adaptive capacity. In addition, a Vancouver Health Index was prepared with components of population health sensitivity, and an Exposure x Health bivariate map was created.

Vulnerable Places and Communities

Parts of Vancouver are more vulnerable to the impacts of climate change than others. For example, there are particular areas in the city – such as "heat islands" with more pavement and fewer trees, floodplain and landslide hazard areas, and areas with limited access to transit – that may experience larger effects from climate change. In addition, some communities and populations – including older adults, individuals living alone, and people with low incomes, disabilities, and/or limited English proficiency – may be more sensitive to climate impacts and require special consideration when planning for climate resiliency.

This study references areas in west, central, and east Vancouver in eight study areas, and identifies vulnerable places and communities. See Exhibit 1.

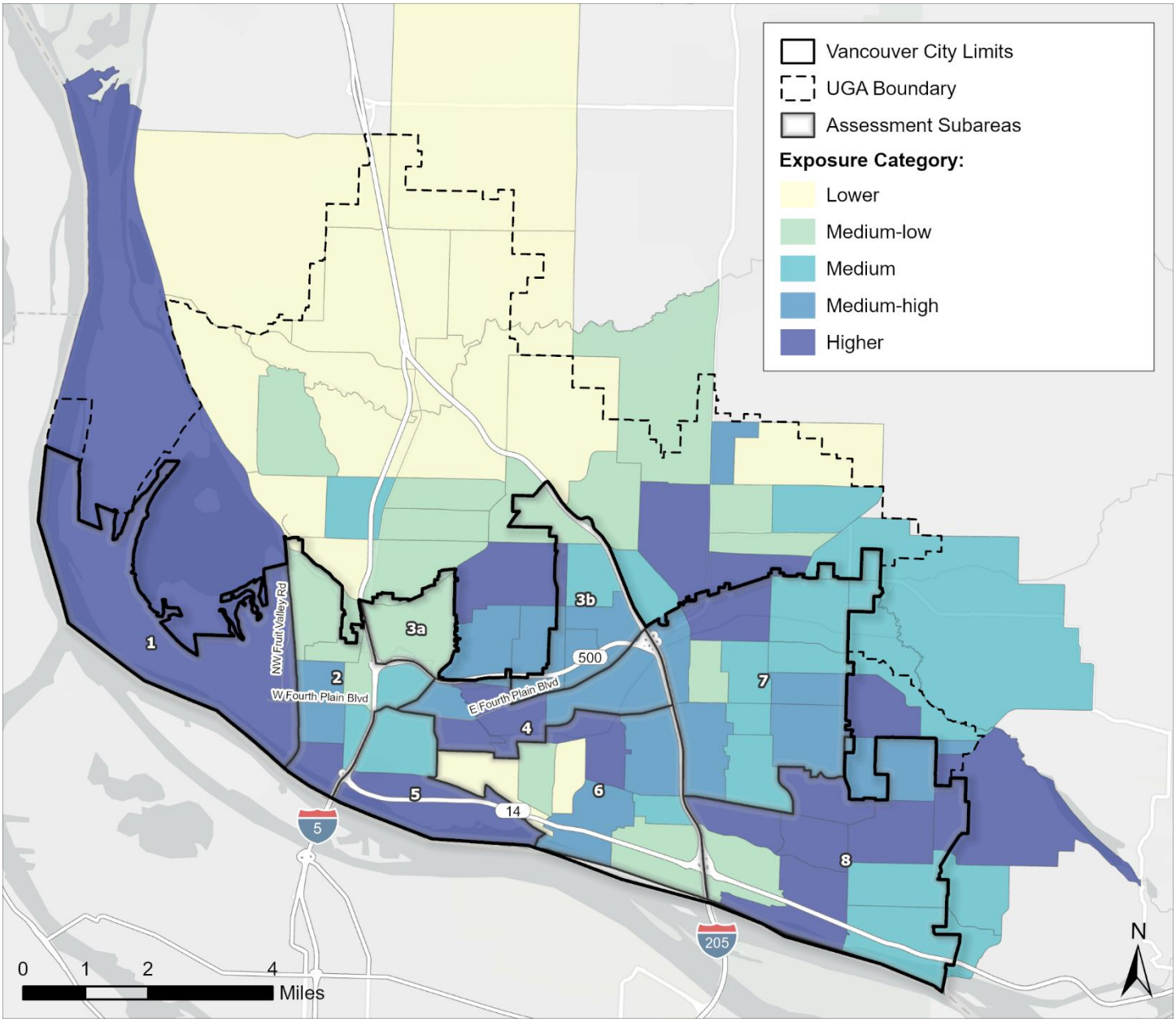
Exhibit 1: Vancouver Areas of Focus



Source: City of Vancouver, BERK 2025.

The Vancouver CVI Exposure Index identifies the following areas at risk of exposure to climate impacts including extreme heat, flooding, or air quality/smoke: Area 1 west of NW Fruit Valley Road, southern edges of Areas 2 and 5 along the Colombia River, Areas 4 and 7 along E Fourth Plain Boulevard, and Area 8 in southeast Vancouver. See Exhibit 2.

Exhibit 2: Exposure Index

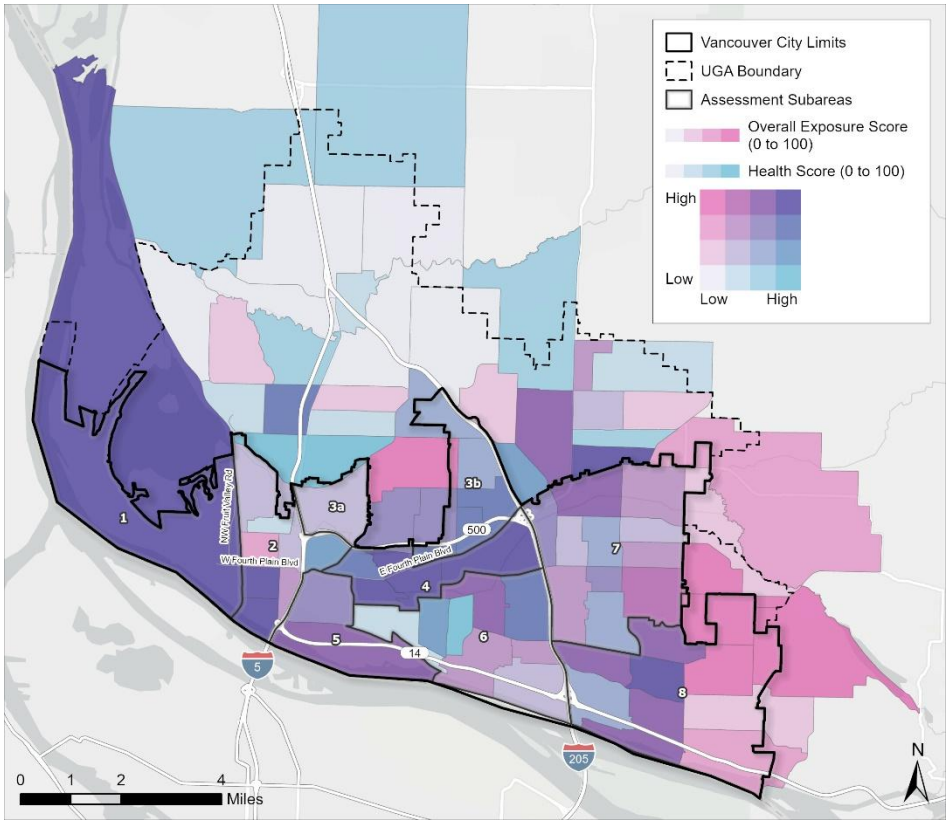


Source: BERK 2025.

Combining Vancouver's Climate Exposure Index plus its Health Index shows populations with vulnerabilities exposed to climate impacts in similar locations in Areas 1, 2, 4, and 8. Census block groups with higher Exposure and higher Equity disparities are found in Areas 1, 2, 4, 7, and 8. See Exhibit 3.

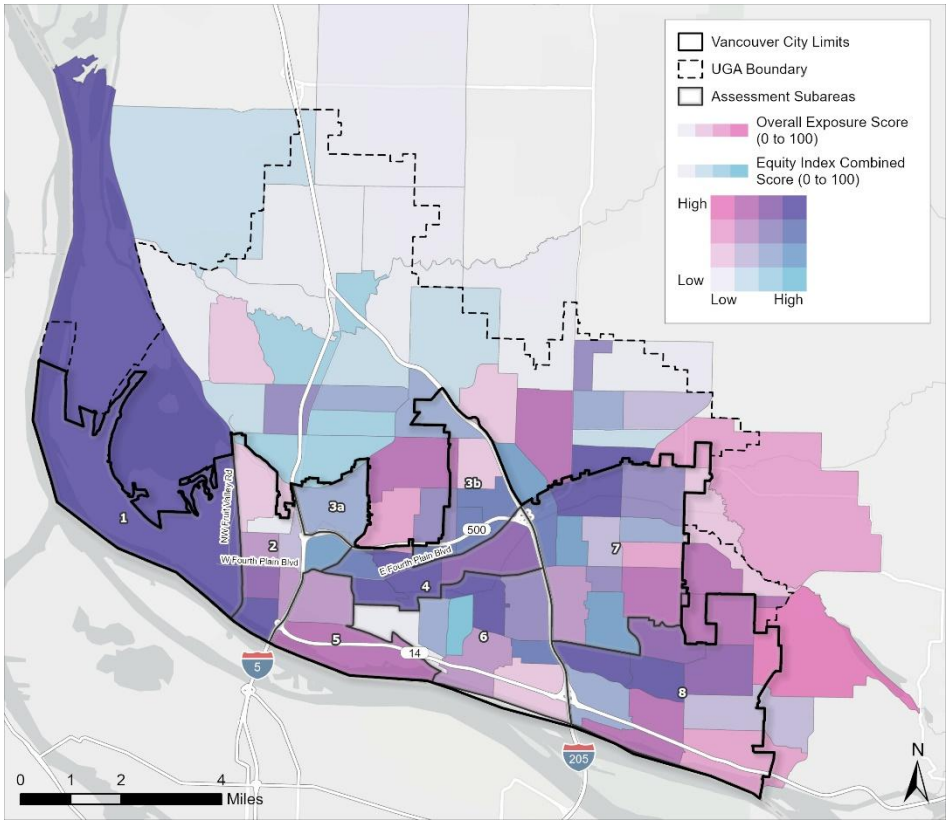
Exhibit 4 and Exhibit 5 provide a table and map with Census tracts having with higher exposure and higher equity or health disparities, and are priorities to address climate adaptation and improve areas that have low or moderate adaptive capacity.

Exhibit 3: Exposure with Health and Equity



Exposure x Health

Locations of higher exposure and health-sensitive populations: West and Central parts of Vancouver along East Fourth Plain Blvd.



Exposure x Equity

Locations of higher exposure and overburdened communities: Vancouver Lake and NW Fruit Valley Road, blocks south of SR 500 and along Fourth Plain Blvd, and Mountain View and Cascade Highlands in East Vancouver.

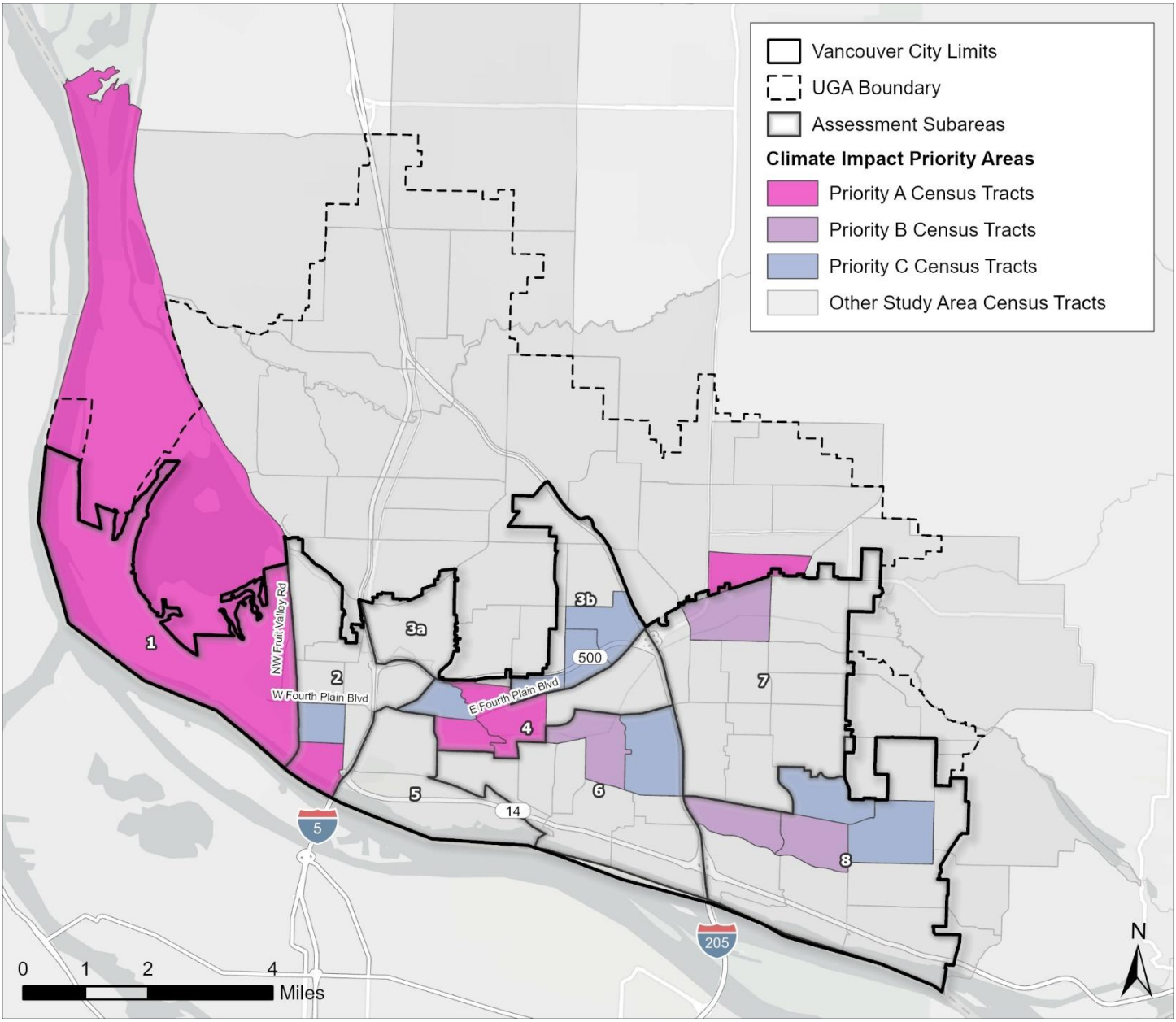
Source: BERK 2025.

Exhibit 4: Census Tracts with Higher Vulnerabilities to Climate Impacts

Census Tracts	Subarea	Percent of Tract in City Limits	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Disparities Index	Priority	Adaptive Capacity
53011041005	1	34.9%	Medium-high	Higher	Lower	Higher	Higher	Higher	A	Moderate (Lake)
53011042300	2	100.0%	Medium	Medium-high	Higher	Medium-high	Higher	Medium-high	C	
53011042400	2	99.3%	Higher	Higher	Medium	Higher	Higher	Higher	A	
53011041111	3b	97.1%	Medium-high	Medium	Medium	Medium-high	Higher	Higher	C	Moderate (Tree)
53011041113	3b	100.0%	Higher	Medium-high	Medium-low	Medium-high	Higher	Higher	C	Moderate (Tree) Moderate SMAP
53011041114	3b	100.0%	Higher	Medium	Medium-low	Medium-high	Higher	Higher	C	Moderate (Tree) Moderate SMAP
53011041600	4	99.6%	Medium-high	Higher	Medium	Higher	Higher	Higher	A	Low (Tree) ATP*
53011041700	4	100.0%	Medium	Higher	Medium	Medium-high	Higher	Medium-high	C	Low (Tree) ATP*
53011042700	4	100.0%	Medium-high	Higher	Medium	Higher	Higher	Higher	A	Low (Tree)
53011041205	6	100.0%	Medium-high	Higher	Medium-high	Higher	Medium-high	Higher	B	Moderate SMAP ATP*
53011041206	6	100.0%	Higher	Medium-low	Medium-high	Medium-high	Higher	Medium-high	C	Low (Tree) Moderate SMAP ATP*
53011040706	7	7.4%	Higher	Medium-high	Medium-low	Higher	Higher	Higher	A (-)	
53011041312	7	100.0%	Higher	Higher	Medium-low	Higher	Medium-high	Higher	B	
53011041320	8	100.0%	Higher	Medium	Medium-high	Higher	Medium-high	Medium-high	C	ATP*
53011041322	8	100.0%	Higher	Medium	Medium-high	Higher	Medium-high	Higher	B	
53011041323	8	100.0%	Higher	Medium	Medium-high	Higher	Medium-high	Higher	B	ATP*
53011041329	8	100.0%	Higher	Medium	Higher	Higher	Lower	Medium-high	C	

A=Higher Overall Exposure and Higher Health and Equity Disparities
B = Higher Overall Exposure and either Higher Health Disparities or Higher Equity Disparities
C = Medium High or Higher in one or more exposures and either Health or Equity Disparities
(-) County Unincorporated
*Active Trip Potential (ATP): locations where short vehicle trips could convert to e-bike, bike, or walking trips with more supportive infrastructure; or where more development could build on existing strengths.
Source: See Chapter 2. BERK, 2025.

Exhibit 5: Map of Census Tracts with Higher Vulnerabilities to Climate Impacts



A=Higher Overall Exposure and Higher Health and Equity Disparities
B = Higher Overall Exposure and either Higher Health Disparities or Higher Equity Disparities
C = Medium High or Higher in one or more exposures and either Health or Equity Disparities
Source: See Chapter 2. BERK, 2025.

Climate Planning Engagement

Vancouver Climate Adaptation Strategy, 2022

In 2022, Vancouver engaged Hatch Planning and Toulan School of Urban Studies and Planning at Portland State University to prepare a *Vancouver Climate Adaptation Strategy*, which included a community engagement process. (Hatch Planning and City of Vancouver, 2022)

- a community-wide survey with 140 responses
- six pop-up events in different locations, and
- five small group conversations

The populations targeted for engagement are similar to those living in areas considered highly vulnerable in Exhibit 5, and included:

- Communities of color, particularly Hispanic or Latino
- High-poverty groups
- Linguistically isolated groups (Spanish, Russian or Eastern European language-speakers)
- Youth, particularly those in informal daycare
- Older adults, particularly those living alone
- Houseless people, including Safe Stay communities
- Manual or outside laborers, especially farmers, landscapers, and trades organizations
- People with disabilities
- Transit-dependent residents

Engagement findings are summarized below and throughout Chapter 5 Vulnerability & Risk Assessment. This 2025 Climate Vulnerability Assessment carries forward from this 2022 effort which recommended a comprehensive vulnerability assessment.

Exhibit 6: Vancouver Climate Adaptation Strategy Engagement Findings

1 Most community members had negative experiences during severe weather events - the wildfire smoke of 2020 and heat wave of 2021. Negative experiences were due to a loss of work time, discomfort and health issues, the canceling of events, and more.	**2** Aside from severe heat and wildfire smoke, participants also worried about snowy and icy weather events, and particularly the power outages and difficulty of travel that comes with those events.
3 Participants identified several circumstances that made it more difficult to deal with severe weather events. These include: • Lack of air conditioning or air purification • Lack of access to a car	• Lack of communication regarding preparedness • Need to work outside during severe weather events • Lack of resources for people with disabilities

4 While many residents do feel prepared for future heat waves and other events, they expressed serious concerns about the safety and well-being of their neighbors and community.	**5** Many participants had ideas for how the city can help them in the future, including providing resources to help households have alternative energy sources in the event of power outages, the creation of cooling and warming shelters, creating community-led disaster drills to help people understand how to stay safe and prepared, and prioritizing low-income or houseless people in city policy to ensure their safety.
6 Some physical elements that community members would like to see include water features such as splash pads, urban gardens and fruit trees, more tree coverage, and community centers or public spaces for neighbors to connect with one another.	**7** Participants cited the need for community education on environmental issues and sustainability through programming and incentives, including conferences, talks, and videos that share the importance of sustainability as well as other educational materials. Participants, particularly those in small group conversations, also saw a need for increased public engagement about this issue.

Source: (Hatch Planning and City of Vancouver, 2022)

Resilience Rising, 2025

As part of the City of Vancouver's ongoing climate resilience planning efforts, a series of *Resilience Rising* community events were hosted in late May and early June 2025 in partnership with Fourth Plain Forward, the Southwest Washington Equity Coalition (SWEC), and Washington Conservation Action. These events focused on elevating local voices and experiences around climate-related risks and responses in neighborhoods most impacted by extreme heat, wildfire smoke, and flooding.

The gatherings were designed to complement this 2025 Climate Vulnerability Assessment and a related Adaptive Capacity Assessment (see following section) by grounding technical recommendations in lived experience. A total of 76 residents participated across three events in **Fruit Valley, Fourth Plain, and Mountain View**, each selected due to their high climate risk scores and social vulnerability indicators.

At each event, there was an interactive mapping exercise which invited participants to identify local assets, risks, and resilience opportunities in their neighborhoods. Participants used stickers, markers, and post-it notes to annotate the maps in both English and Spanish, with bilingual facilitators on hand to support discussion. A common theme throughout was the desire for more equitable access to climate-resilient infrastructure—including safe gathering spaces, localized food and resource hubs, and culturally relevant emergency response strategies.

Engagement results are highlighted in Exhibit 7 and throughout this study.

Exhibit 7: Resilience Rising Engagement Summary

Climate Risks Are Experienced Unequally. Participants noted that extreme heat, flooding, and wildfire smoke have disproportionate impacts across the city, especially for residents in East and Central Vancouver. Barriers include: • Transportation limitations for seniors, youth, and people with disabilities • Fear or mistrust of federal-linked spaces among undocumented communities • Lack of signage or public awareness of available resources	**Schools, Religious Facilities, and Businesses as Anchors.** Participants were enthusiastic about repurposing underused or privately owned spaces to provide cooling, clean air, and resource distribution during future climate events. Specific suggestions included equipping schools with air filtration and backup power, training church volunteers, and leveraging local businesses to help spread emergency information.
Food Security and Local Food Systems. Several participants expressed interest in expanding community food forests, edible landscaping, and culturally relevant gardens to increase food access and resilience. Many attendees pointed to successful local examples—including fruit tree gleaning programs and community partnerships—that show potential for scaling.	**Community-Led Solutions and Trusted Messengers.** Residents expressed a strong interest in building neighbor-to-neighbor networks and empowering local leaders to help organize emergency response. Ideas included community phone trees, CERT team recruitment, and creating preparedness flyers with the contact information of trusted local point people.
Gaps in Infrastructure and Communication. Participants identified several physical and procedural gaps that hinder preparedness and resilience: limited cooling centers with adequate space and signage, public transit challenges during storm events, lack of emergency information in multiple languages, and difficulty navigating scattered resources.	**Desire for Action and Accountability.** While attendees appreciated the opportunity to provide input, some were skeptical about whether tangible changes would result. Still, most remained hopeful and urged the City and its partners to prioritize the ideas that came directly from community voices, especially those grounded in lived experience and local expertise.

Source: (City of Vancouver, 2025)

Adaptive Capacity Assessment 2025

The City of Vancouver met with an interdepartmental team and with regional emergency management agencies to develop more specific asset mapping and adaptive capacity recommendations overlaying locations of critical facilities and places of assembly on top of maps of exposures such as extreme heat, flooding, and wildfire/smoke including:

- Fire and Police Stations
- Libraries, Senior Centers, and Community Centers, often serving as warming or cooling shelters
- Schools
- Parks and Trails
- Transit Stops
- Water, Sewer, and Stormwater

The asset maps help to pinpoint the most pressing areas for investment. Results are included in relevant sector evaluations in Chapter 5 Vulnerability & Risk Assessment, and in the Appendix.

Vulnerability and Risk Summary by Sector

Across 11 sectors, Chapter 5 Vulnerability & Risk Assessment considers vulnerable places and communities and risk of impacts (probability and magnitude). A summary of the results for the 11 sectors is shared in Exhibit 6.

Sectors most at risk across multiple climate impacts, with the greatest potential for loss and affecting vulnerable communities include:

- Buildings & Energy
- Emergency Management
- Health and Wellbeing
- Transportation
- Water Resources

Exhibit 8: Vulnerability and Risk Summary by Sector

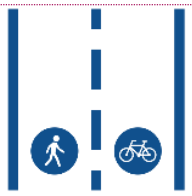
Sector	Likely Climate Impacts in next 10+ years				Magnitude of Loss			City Responsibility			Vulnerable Communities			Areas Most Affected							
	Heat	*Fire*	*Precip*	*Drought*	*Less*	*More*	*Most*	*Less*	*More*	*Most*	*Less*	*More*	*Most*								
Agriculture and Food Systems	■	■	■	■	■			■	■		■	■		1	2	3A	3B	4	5	6	7	8
Buildings & Energy	■	■			■	■		■	■		■	■	■	1	2	3A	3B	4	5	6	7	8
Cultural Resources & Practices	■	■	■	■	■	■		■	■		■	■		1	2	3A	3B	4	5	6	7	8
Economic Development	■	■	■		■	■		■	■		■	■		1	2	3A	3B	4	5	6	7	8
Emergency Management	■	■	■		■	■		■	■		■	■	■	1	2	3A	3B	4	5	6	7	8
Health & Well-being	■	■			■	■		■	■		■	■	■	1	2	3A	3B	4	5	6	7	8
Ecosystems	■	■	■	■	■	■		■	■		■	■		1	2	3A	3B	4	5	6	7	8
Transportation	■	■	■		■	■	■	■	■		■	■	■	1	2	3A	3B	4	5	6	7	8
Waste Management	■	■	■		■			■			■			1	2	3A	3B	4	5	6	7	8
Water Resources	■	■	■	■	■	■	■	■	■	■	■	■	■	1	2	3A	3B	4	5	6	7	8
Zoning & Development	■	■	■	■	■	■		■	■	■	■	■		1	2	3A	3B	4	5	6	7	8

Sources: See Chapter 5. Compiled by BERK, 2025.

Vancouver has planned for climate action and hazard management planning. However, new or more extensive resilience strategies could be implemented to address gaps or opportunities. See Exhibit 7. These are further described in Chapter 5 Vulnerability & Risk Assessment.

Exhibit 9: Sectors, Priorities, and Resilience Strategies

Sector	Potential Concerns/ Priorities	Who is Most Affected?	Highlighted Resilience Strategies
Agriculture & Food Systems	Urban agriculture and local food systems, community gardens, food banks	Residents in poverty or in food deserts Community garden users	 Increase Food Resilience & Access
Buildings and Energy	Naturally occurring affordable housing New housing development, new business spaces	Residents in older housing stock, particularly those who are cost burdened New construction, commercial or residential	 Building Retrofits/Design Renewable Energy
Cultural Resources	Historic and archaeological site protection Critical areas protection Food sovereignty	Tribes Historic property owners	 Natural Infrastructure
Economic Development	Outdoor jobs Recreation events Transportation system interruption	Outdoor workers Tourism/recreation oriented businesses Health care providers Commuters	 Green technology, circular economy, connected city Complete/ Sustainable Communities Local Businesses Support Emergency Response

Sector	Potential Concerns/ Priorities	Who is Most Affected?	Highlighted Resilience Strategies
Emergency Management	Cooling and clean air centers, storm management, redundant functions	Persons with health sensitivities Emergency personnel	 Disaster Management and Service Continuity Partner with Community Based Organizations
Health & Well-being	Tree canopy equity Health services access Access to cooling and clean air centers due to lack of transportation, lack of awareness, or mistrust	Persons with health sensitivities Unsheltered persons	 Improve transportation access to facilities and services CBOs as Essential Resilience Partners Neighborhood specific community preparedness and pilot projects
Ecosystems	Trees, riparian areas, stream flows, water quality	Neighborhoods with high impervious areas, and limited green or blue infrastructure	 Urban Forest
Transportation	Regional and local commuting, acute stormwater flooding, heat and transit	Transit dependent populations such as those with disabilities or lower incomes	 Infrastructure Upgrades

Sector	Potential Concerns/ Priorities	Who is Most Affected?	Highlighted Resilience Strategies
Waste Management	Heat, smoke and outdoor workers; extreme weather and debris	Outdoor workers Neighborhoods with extensive/older tree canopy	 Debris management plan, smoke protections Planning to Reduce Exposure & Monitoring Risk
Water Resources	Demand on stormwater system Water system resilience Wastewater Plant fortification	Neighborhoods with high impervious areas, and limited green or blue infrastructure	 Natural Infrastructure
Zoning	Tree canopy, infill housing and business nodes with multimodal mobility	Households with cost burdens, areas with low connectivity, park gap areas, low active trip areas, communities with disparities in tree canopy	 Complete/ Sustainable Communities

Policy Recommendations

A **Climate Resilience Policy Evaluation** under separate cover is summarized by sector in Chapter 5. Strengthening policies in the new Climate, Environment, Community Health, Sustainability and Resiliency Element will give purpose and direction to climate actions and strategies.

Use of Report

This Climate Vulnerability Assessment has provided a foundation for developing climate resilience policies and adaptive capacity strategies with city departments and the community.

This report, in conjunction with a related Climate Resilience Policy Evaluation, has helped the City prepare a Climate Element of the Comprehensive Plan Periodic Update.

2. Climate Change in Vancouver

Regional Climate Trends

The Pacific Northwest including Vancouver are experiencing extreme heat, extreme precipitation, drought and reduced summer stream flows, and exposure to wildfires, especially smoke. Key findings of the Fifth National Climate Assessment, Northwest chapter, (Chang, 2023) include the following for Washington, Oregon, and Idaho:

- **Warming and Extreme Heat:** Annual average air temperatures in the region have risen by almost 2°F since 1900. Washington and Idaho have warmed by nearly 2°F, and Oregon has warmed by 2.5°F. Relative to 1900–2020, the annual number of extremely hot days and warm nights in the Northwest has been above the long-term average over the past decade, and the annual number of extremely cold nights over the same period has been below the long-term average. Future warming in the region is expected to exacerbate regional heatwave intensities.
- **Extreme Precipitation:** The frequency and intensity of extreme precipitation events are projected to increase across the region. Long, narrow bands of atmospheric water vapor transport, commonly known as atmospheric rivers (ARs), are associated with extreme precipitation in the western United States, where they contribute an average of 30%–45% of total winter precipitation. A greater number of strong AR events and fewer moderate and weak events are projected to occur. ARs are projected to reach farther inland.
- **Summer Precipitation and Drought:** Summer precipitation is projected to decline under all scenarios, although it will be variable, contributing to more frequent, longer, and more severe regional drought conditions that increase wildfire risk and decrease water availability. Observed lower stream flows in summer are expected to decrease even further due to reduced snow storage, increased evapotranspiration, and longer lags between summer precipitation events.

> ...Some scientists have described the 2021 heat dome as a 1,000-year event made 150 times more likely by climate change. Instead of being a rare anomaly, events like the heat dome could occur every five to 10 years with 2 degrees C of global warming, they say.
>
> ... An estimated 1,400 deaths in the United States and Canada were attributed to the heat dome. Shellfish and other marine animals experienced mass die-offs. Crops were lost, sections of Interstate 5 buckled, and Portland's Max commuter train shut down when its attached power lines melted.
>
> ~ (Kramer, 2024)

The University of Washington Climate Impacts Group has developed a climate resilience mapping tool addressing climate hazards, indicators, and impacts for each county in the

state, including Clark County. Some of the data is available at a smaller scale than the county. Information from the tool has been gathered for the year 2050 using the Representative Concentration Pathway (RCP) 8.5 GHG concentration level, which is a very high GHG scenario. The GHG scenarios do not differ significantly prior to 2050. The year 2050 is similar to the 2045 Comprehensive Plan periodic update horizon. See Exhibit 9.

Exhibit 10: Climate Change by Year 2050 (Change 2040-2069 compared to Historic 30 Years, Typically 1980-2009, RCP 8.5)

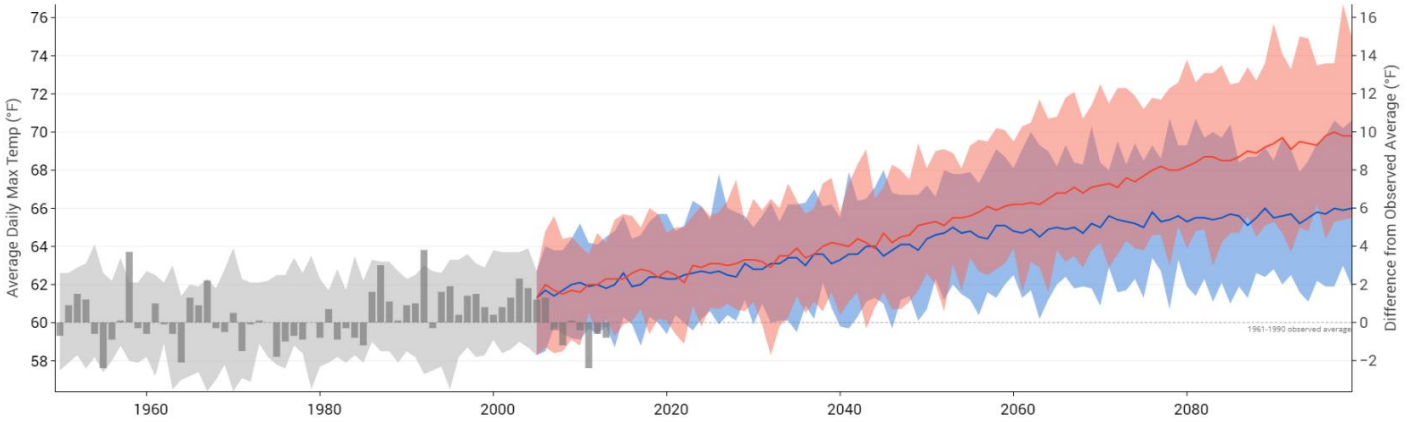
Climate Hazard	Potential Impacts	Climate Data for Clark County
 **Extreme Heat**	Warmer summers are expected to increase the potential for heat stress on plants and trees and ecosystems, and increase demand for irrigation. Warmer summers are expected to increase concentrations of air pollutants, such as ozone and some vector-borne illnesses, such as West Nile virus. Warmer stream temperatures have the potential to reduce water quality and habitat quality for fish and wildlife. Extreme heat is anticipated to increase the demand for building cooling, increase concentrations of air pollutants, and increase health impacts for sensitive populations.	+6 °F change in average summer (June - August) maximum temperature + 39 days in annual 90°F maximum humidex days (heat + humidity) Average August stream temperature: • 20.9 °C Burnt Bridge Creek • 18.4 °C Fisher Creek • 23.1 to 23.6 °C Columbia River
 **Drought**	In freshwater ecosystems, less summer precipitation will contribute to lower stream flows, reduce water quality, and increase water temperatures. In terrestrial ecosystems, less summer precipitation will contribute to drought stress and reduce the growth and productivity of some plants. More frequent and severe droughts due to low summer precipitation are expected to increase the need for emergency services to plan, prepare, and respond to water shortages. Increases in annual precipitation have the potential to increase groundwater recharge. Changes in the timing and intensity of precipitation and increases in water demand and evaporation are expected to offset increases in groundwater recharge due to more annual precipitation.	34% chance in 2050 that summer precipitation is at or below 75% of normal -5%, Burnt Bridge Creek, and -21% on Columbia River, percent change in low streamflow in summer (June-September) 9.3% average percent change in total annual precipitation -17.9% change in average July 15 - September 15 total precipitation

Climate Hazard	Potential Impacts	Climate Data for Clark County
 Wildfire & Smoke	More frequent wildfires have the potential to reduce forest habitat for some wildlife and increase establishment of invasive species. More frequent wildfires have the potential to increase runoff and sediment to streams. More days with high wildfire danger are expected to affect businesses through more frequent closures of recreation areas and restrictions on outdoor activities during the wildfire season. Poor air quality due to more wildfire smoke can cause adverse respiratory health effects.	In Vancouver 37% chance the average likelihood of climate and fuel conditions being conducive to wildfire (Countywide average is 9%). Change in high fire danger days, 9 days in Vancouver (8 days for Clark County average.
 Extreme Precipitation	Heavier precipitation is expected to intensify flooding in low-lying areas and require higher capacity storm water drainage systems. This could reduce the suitability of some areas for certain land uses and require relocation of some development. More disruptions to business operations and damage to infrastructure including transportation.	13% increase in the total precipitation of the 2-year storm. 14% change in the total precipitation of the 25-year storm.
 Flooding	Higher stream flows are expected to increase riverine flooding within existing floodplains and could expand flooding to new areas not currently in existing floodplains. Higher stream flows reduce the availability of slow-water habitat and can increase sedimentation that affects habitat quality. Higher stream flows are expected to increase riverine flooding, which can damage roads, bridges, and railways and overwhelm drainage structures, such as culverts.	14% change, along Burnt Bridge Creek, in the annual maximum streamflow -5% Columbia River in the annual maximum streamflow Frequency in high streamflow Burnt Bridge Creek, 9.0 years; Columbia River 21.1 years; instead of every 25 years

Source: (Raymond, Climate Mapping for a Resilient Washington, 2022)

Other climate change trends available from the US Climate Toolkit Climate Explorer shows increases in extreme heat are clear at either RCP 4.5 or RCP 8.5. See Exhibit 10 and Exhibit 11.

Exhibit 11: Average Daily Max. Temp. (°F) – Historic and Projected Trends – Clark County, WA

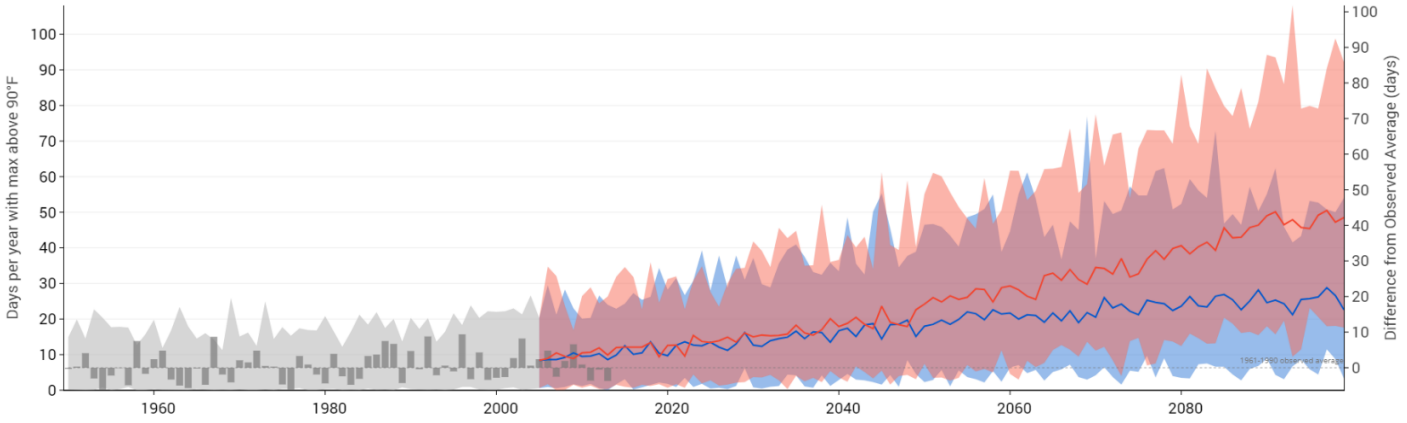


Note: For the contiguous US, graphs and maps for 1950 - 2013 show averages of observations recorded at individual climate and weather stations. Data are available from NOAA's National Centers for Environmental Information. Graphs in Climate Explorer show results generated by global climate models for the Coupled Model Intercomparison Project Phase 5 (CMIP5). For the contiguous US, the climate model data were statistically downscaled using the Localized Constructed Analogs method (LOCA; Pierce et al. 2014).
Source: (US Climate Resilience Toolkit, 2024)

Average Daily Maximum Temperatures are projected to rise to over 64 °F by 2040.

- 1961–1990 observed average: 60 °F
- 2005 observed: 61.3 °F
- Projection Higher Emissions RCP 8.5: 2040 64.4 °F | 2050 65.6 °F
- Projection Lower Emissions RCP 4.5: 2040 63.8 °F | 2050 64.7 °F

Exhibit 12: Days with Max. Temp. > 90°F – Historic and Projected Trends – Clark County, WA



Note: For the contiguous US, graphs and maps for 1950 - 2013 show averages of observations recorded at individual climate and weather stations. Data are available from NOAA's National Centers for Environmental Information. Graphs in Climate Explorer show results generated by global climate models for the Coupled Model Intercomparison Project Phase 5 (CMIP5). For the contiguous US, the climate model data were statistically downscaled using the Localized Constructed Analogs method (LOCA; Pierce et al. 2014).
Source: (US Climate Resilience Toolkit, 2024)

Days w/ maximum temp > 90°F are projected to increase by at least 17 days by 2040 and 20 days by 2050.

- 1961–1990 observed average: 6.3 days with maximum above 90
- 2005 observed: 8.7 days
- Projection Higher Emissions RCP 8.5: 2040 19.5 days| 2050 26.4 days
- Projection Lower Emissions RCP 4.5: 2040 17.2 days| 2050 20.2 days

CLIMATE MODELS

Climate models are mathematical representations of processes important in the Earth's climate system. The Representative Concentration Pathways (RCPs) describe four different 21st century pathways of GHG emissions and atmospheric concentrations, air pollutant emissions and land use; they include a stringent mitigation scenario (RCP2.6), a low scenario (RCP 4.5), an intermediate scenario (RCP4.5), and one scenario with very high GHG concentration (RCP8.5). Scenarios without additional efforts to constrain emissions lead to pathways ranging between RCP6.0 and RCP8.5. RCP2.6 is representative of a scenario that aims to keep global warming likely below 2°C above pre-industrial temperatures. See Intergovernmental Panel on Climate Change (IPCC), 2021: https://ar5-syr.ipcc.ch/topic_futurechanges.php.

Climate projections are typically based on historical trends (e.g., 1980-2009). The projections are mid-points of 30 year periods and the average of multiple global climate models. The higher GHG scenario (RCP 8.5) causes more warming by the end of the century compared to the moderate (A1B) and lower (RCP 4.5) scenario, but the scenarios do not differ significantly prior to 2050. For near-future applications, the choice of GHG scenario is less important than for late century applications. See: https://cig-wa-climate.nkn.uidaho.edu/.

Climate Vulnerability Evaluation

Climate vulnerability is defined as the sum of exposure to a changing climate and the inherent sensitivity of people or environments to a changing climate, minus capacity of the community and place to cope with impacts of a changing climate. See Exhibit 12 and Exhibit 13. For example, there are areas that are more vulnerable due to extreme heat, such as "heat islands" with more pavement and less trees, or areas with a higher concentration of older residents (health sensitivity). There are areas that are vulnerable to extreme precipitation such as floodplains and landslide hazard areas, along with populations that live alone or have less access to a vehicle (low adaptive capacity). (US Climate Resilience Toolkit, 2021)

Exhibit 13: Elements of Climate Vulnerability

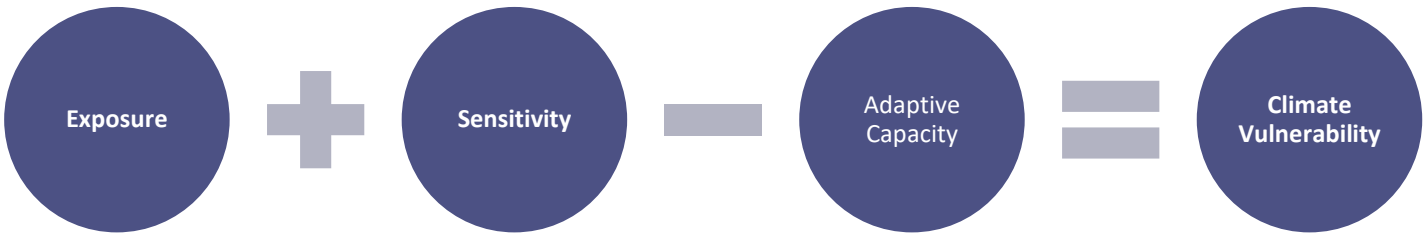


Exhibit 14: Definitions of Climate Vulnerability and Indicators

Exposure	Sensitivity	Adaptive Capacity	Vulnerability
The presence of people, assets, and ecosystems in places where they could be adversely affected by hazards	The degree to which a system, population, or resource is or might be affected by hazards.	The ability of a person, asset, or system to adjust to a hazard, take advantage of new opportunities, or cope with change.	The propensity or predisposition of assets to be adversely affected by hazards. Vulnerability encompasses exposure, sensitivity, potential impacts, and adaptive capacity.
Common Indicators Extreme Heat Extreme Precipitation Flooding Wildfire Smoke and Danger Air Pollution	Common Indicators < 5 years old > 65 years old Steep slopes / geologic hazards Waterbodies on 303d list Diabetes Asthma Respiratory disease Heart Disease	Common Indicators People of Color Poverty Less than high school degree Linguistic Isolation Living Alone Housing Cost Burden Access to Vehicle Housing Condition Population Density Urban Heat Island Impervious Surface Unemployment Outdoor Professions Population no health insurance Tree canopy coverage Access to Open Space	Common Indicators Combination of exposure, sensitivity and adaptive capacity indicators

Source: (US Climate Resilience Toolkit, 2021) (Yu, 2021)

Through the climate vulnerability assessment process, this study produced a Climate Vulnerability Index (CVI). The goal of the CVI is to create a geospatial tool that synthesizes key climate, environmental, and community data to inform the City's land use and climate planning work. The CVI is designed to identify areas within Vancouver that are more vulnerable to climate change.

The Vancouver CVI presents a series of indices and bivariate intersections. The Exposure Index represents the City's first index regarding Climate Exposure. In addition, to support the CVI, a Vancouver Health Index was also prepared with components of population health sensitivity. The CVI also makes use of the City's Equity Index which considers facets of sensitivity and adaptive capacity, particularly socioeconomics. Altogether the following intersections were made:

- **Climate Exposure** intersection with **Vancouver Equity Index** analysis
- **Climate Exposure** intersection with **Community Health Metrics**

CLIMATE INDEX DESCRIPTION AND SCORING

Building an index is the process of standardizing or normalizing data to allow for 'apples-to-apples' comparisons between dissimilar datasets. The data is summarized at the block group level for each block group in the planning area (Vancouver + UGA). After each block group contains the summarized metric for each of the exposures, z-score standardization is used to rank each exposure indicator. Z-scores represent how many standard deviations from the mean a given value is. These allow us to understand how a given indicator value for a block group relates to the rest of the dataset. For example, looking at urban heat islands, if a block group had a z-score value of -1.5, that would mean that urban heat island exposure in that block group is relatively low compared to the rest of the planning area. On the other hand, if it had a score of +1.5, that would mean exposure is relatively higher in that block group compared to the rest of the planning area. Once z-scores are calculated for each block group and each indicator, they are considered standardized, and because they are all representing the same metric (number of standard deviations away from the mean), they can be averaged together to create multidimensional metrics or indices.

Climate Exposure, Equity, and Health

Exhibit 14 details the datasets used to analyze exposure to heat, precipitation/flooding, and smoke/air quality. These datasets provide for the greatest granularity and spatial resolution for use in an index. Notably, this list excludes climate projections for the region produced by the University of Washington Climate Impacts Group, as they do not have high enough spatial resolution to show geographic variability across the City of Vancouver.

Exhibit 15: Exposure Index Metrics and Data Sources

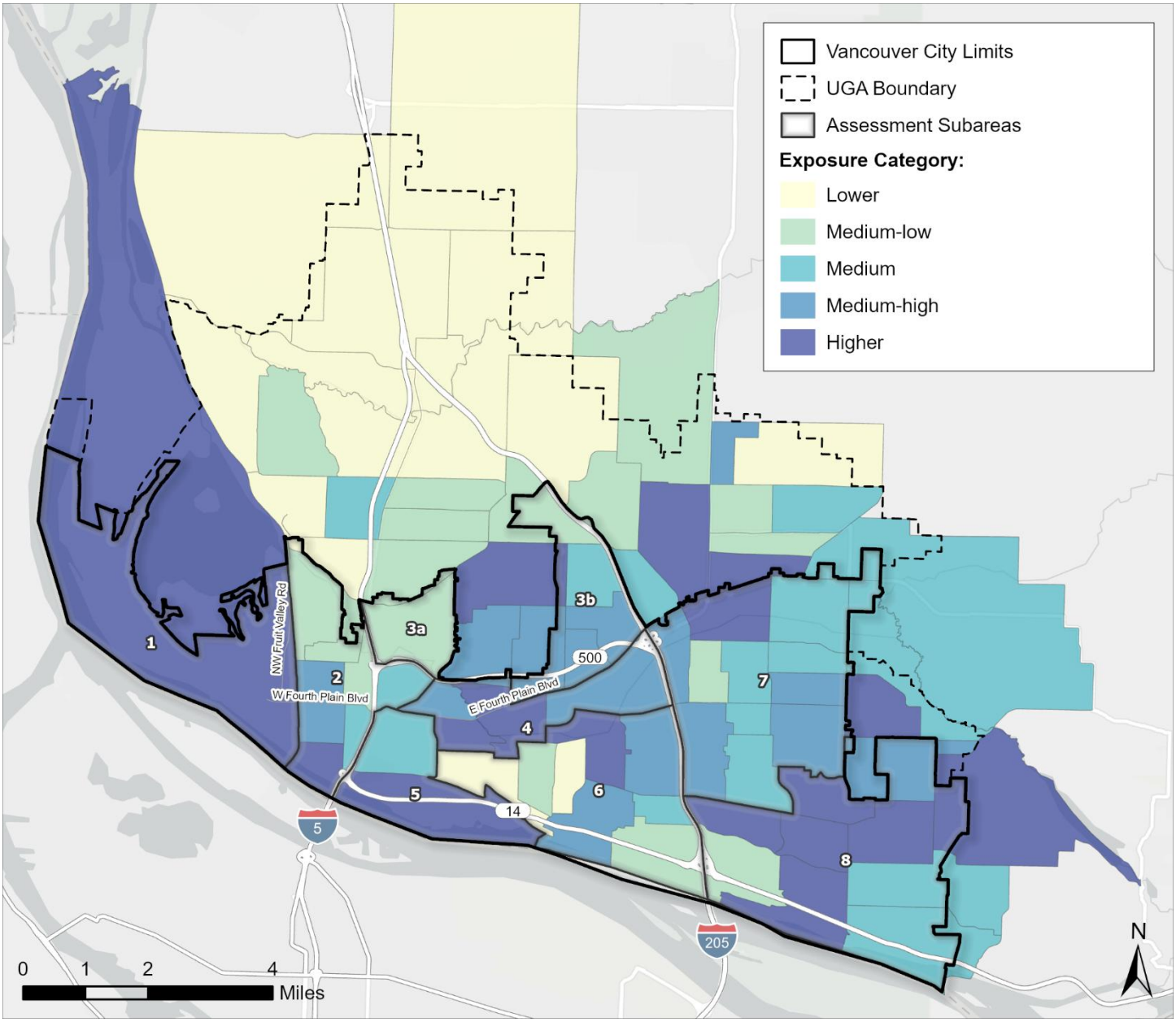
Category	Metric	Description	Source	Data Year(s)
Heat	Land Surface Temperature – Urban Heat Islands	Average Land Surface Temperature	LANDSAT8 / BERK Consulting	2019-2023
Heat	Heat Wave Exposure - Hazard Type Risk Index Score	Heat Wave Exposure - Hazard Type Risk Index Score	FEMA National Risk Index for Natural Hazards	2023
Heat	Low Tree Canopy	Percent of Tract NOT Intersecting Tree Canopy	City of Vancouver / WDFW High Resolution Change Detection	2019 / 2017
Flooding / Precipitation	100- and 500-yr Floodplains	Percent of Tract Intersecting 100- or 500-yr Floodplains (excluding the actual waterways from which floods originate)	FEMA FIRM Floodplains	2021

Category	Metric	Description	Source	Data Year(s)
Flooding / Precipitation	Urban Flooding - Impervious Surfaces	Percent of Tract Comprised of Impervious Surfaces	City of Vancouver / WDFW High Resolution Change Detection	2019 / 2017
Flooding / Precipitation	Riverine Flooding Exposure - Hazard Type Risk Index Score	Riverine Flooding Exposure - Hazard Type Risk Index Score	FEMA National Risk Index for Natural Hazards	2023
Smoke / Air Quality / Fire	Wildland Urban Interface	Percent of Land Area Intersecting WUI Intermix or Interface	WA DNR	2019
Smoke / Air Quality / Fire	Proximity to High Traffic Volume	Average Annual Daily Traffic at Major Roads Within 500 meters of Census Block Centroid	EJ Screen	2020
Smoke / Air Quality / Fire	Ozone Concentration	Average Ozone Concentration	NW-AIRQUEST Regional Background Design Values, 2014-2017 estimates	2014-2017
Smoke / Air Quality / Fire	Ozone Concentration	Ozone annual mean top 10 of daily maximum 8-hour concentration in air	EJ Screen / US EPA	2019
Smoke / Air Quality / Fire	PM2.5 Background Concentration	Average PM2.5 Concentration	Field PM2.5 2014 – 2017 estimates from the Washington State Department of Ecology	2014-2017
Smoke / Air Quality / Fire	PM2.5 Background Concentration	PM 2.5 levels in air measured using an annual average	EJ Screen / US EPA	2019

Sources: Compiled by BERK, 2025.

Combining indicators of extreme heat, extreme precipitation/flooding, and wildfire danger/smoke, a unified index is presented below. The areas with the highest exposure to climate change are identified west of I-5 around Vancouver Lake and along NW Fruit Valley Rd, between I-5 and I-205 in central Vancouver south of SR 500, along Fourth Plain Blvd and E 18th St, and in east Vancouver along SE Mill Plain Blvd. See Exhibit 15.

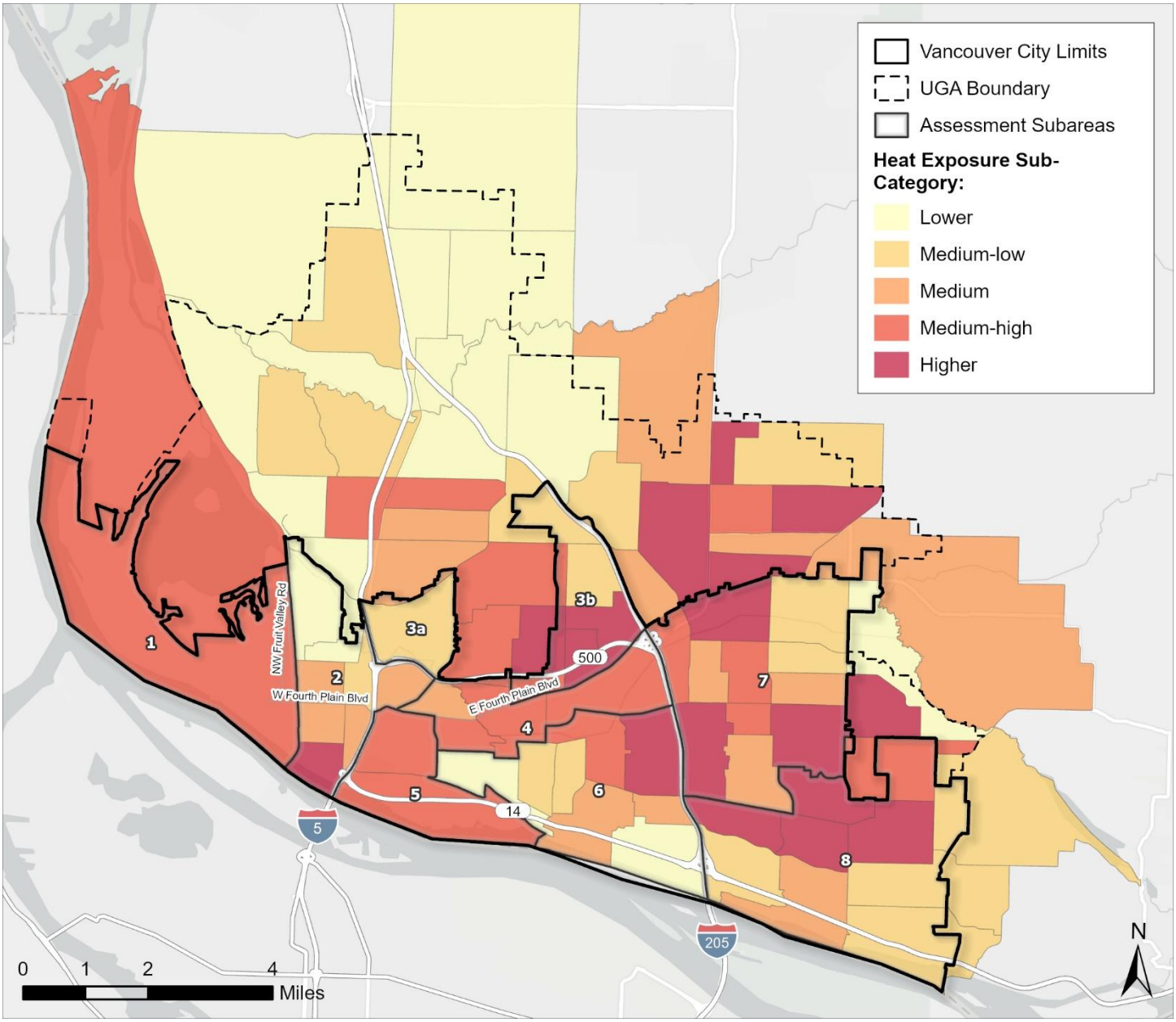
Exhibit 16: Vancouver Climate Exposure Index



Source: BERK Consulting, 2025.

Extreme heat is a driver of climate exposure east of I-205 and along SE Mill Plain Blvd, as well as areas in the UGA. Medium high exposure to extreme heat is found around Vancouver Lake and in other areas in east Vancouver. See Exhibit 16.

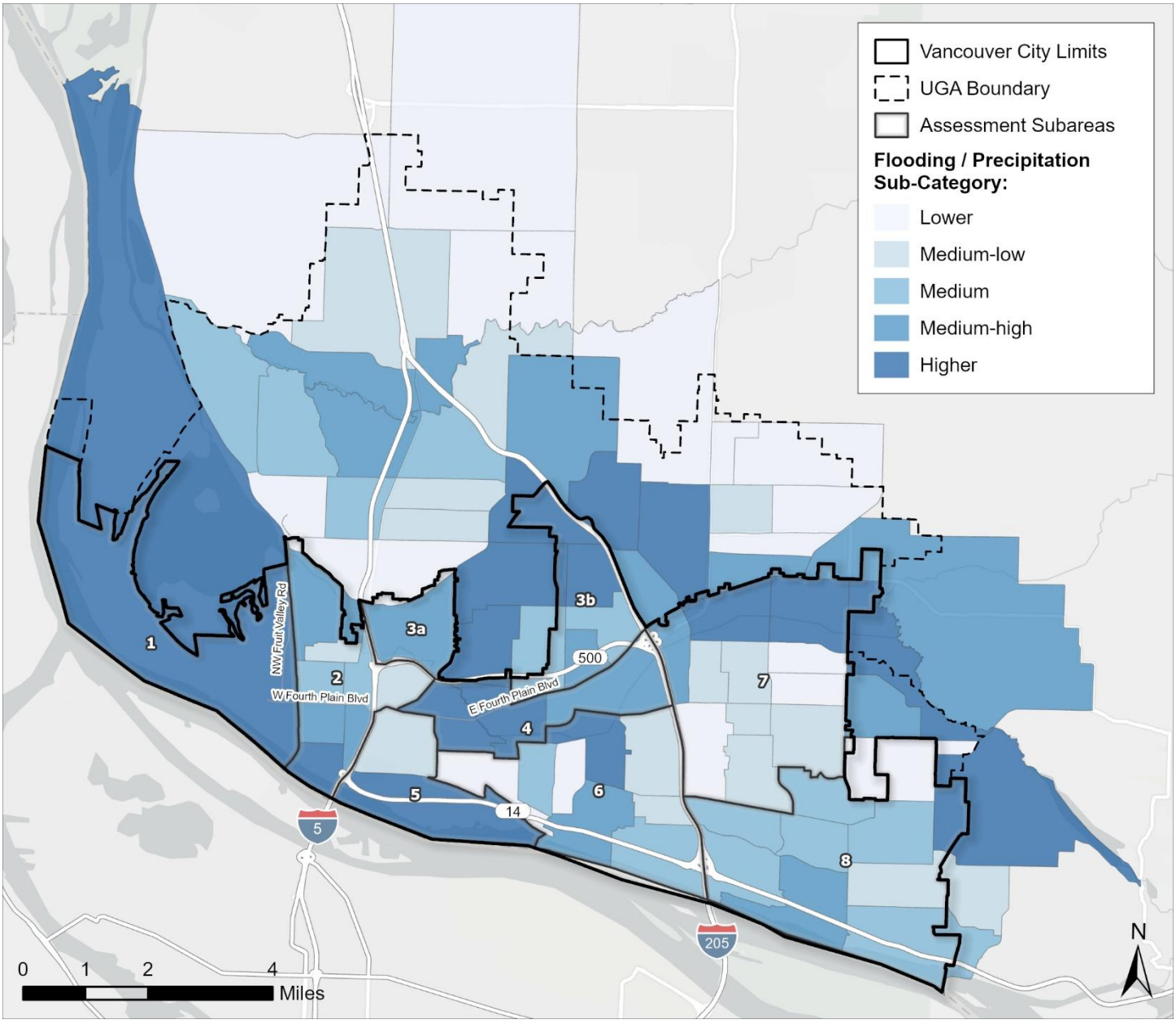
Exhibit 17: Extreme Heat Exposure Index



Source: BERK Consulting, 2025.

Higher exposure to flooding and extreme precipitation is identified around Vancouver Lake and in central Vancouver around Burnt Bridge Creek. See Exhibit 17.

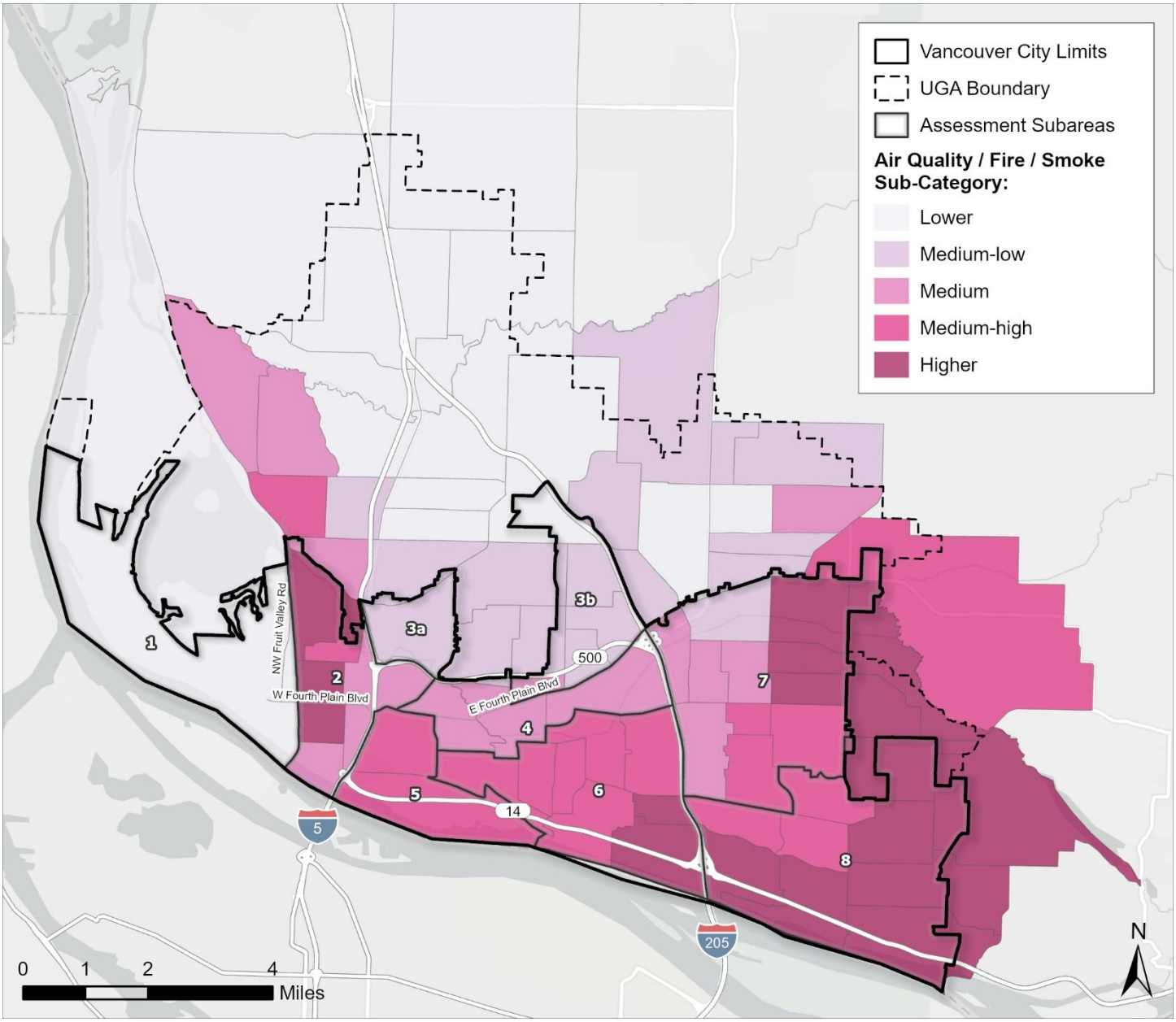
Exhibit 18: Flooding and Precipitation Exposure Index



Source: BERK Consulting, 2025.

Areas of higher Air Quality/Smoke/Wildfire exposure are east of NW Fruit Valley Rd, along SR 14 and in southeast Vancouver. While some data sources suggest wildfire risk around Vancouver Lake, the block has very low ozone scores and low to average PM2.5 scores. The Wildland Urban Interface for that area also is not as high as for other blocks in East Vancouver. See Exhibit 18.

Exhibit 19: Air Quality/Smoke/Wildfire Exposure



Source: BERK Consulting, 2025.

Equity Index + Climate and Equity

The City created an Equity Index with a number of metrics meant to

> *"translate the self-expressed values and local knowledge of underrepresented or underserved community members into a data-driven mapping exercise. The results of the mapping exercise can be used in multiple ways. For example, to identify priority investment areas; to tailor programmatic offerings into specific communities; or to simply better understand the dynamics of social vulnerability across a geographic landscape."*

Metrics include aspects of sensitivity (age) and adaptive capacity (socioeconomics) such as race, language, poverty, renter households, and education. See Exhibit 19.

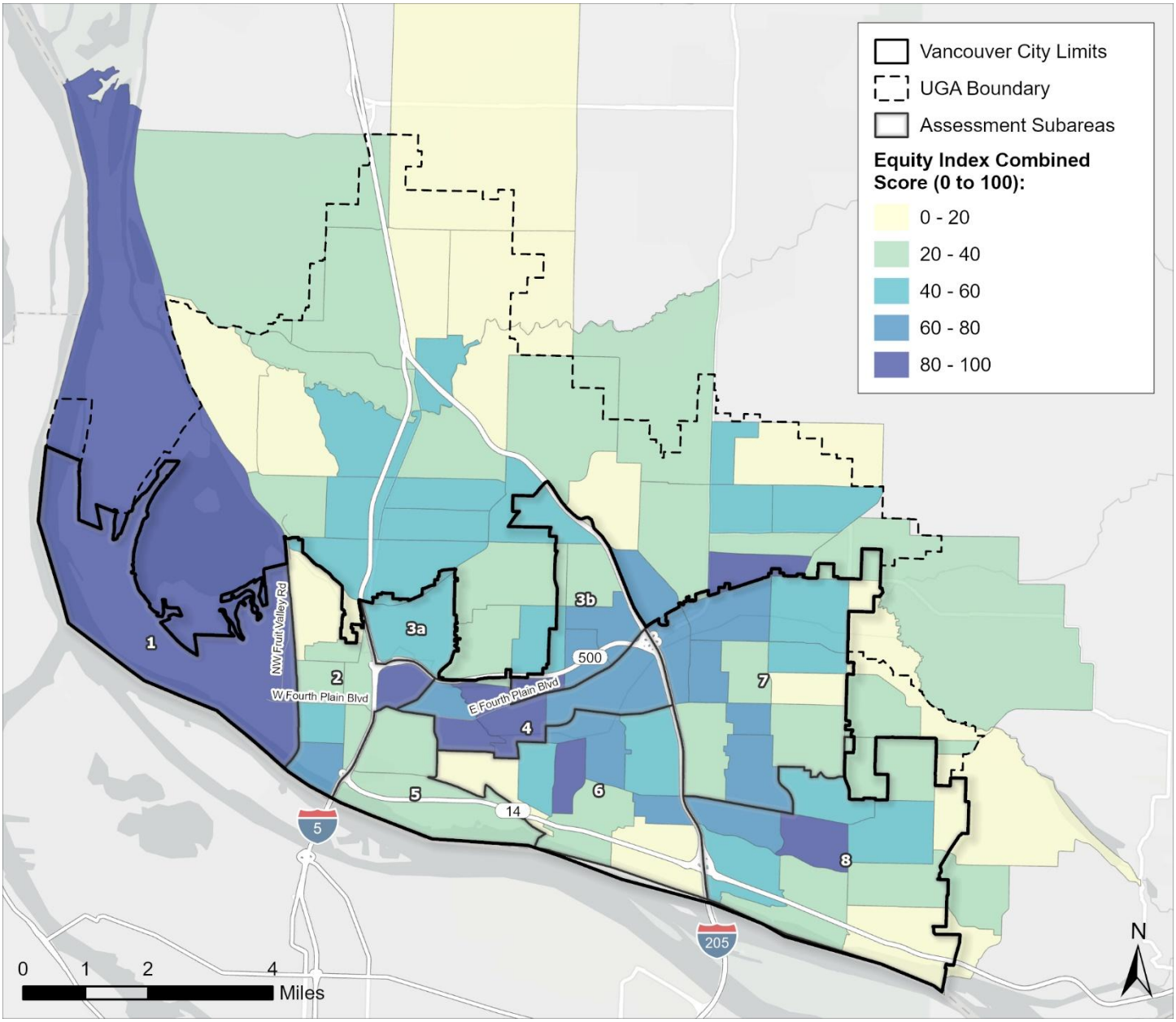
Exhibit 20: Equity Index Metrics

Metric	Source 2010-2020	Relationship to Vulnerability
People of color	ACS B03002	Adaptive Capacity
People below 200% poverty	ACS C17002	Adaptive Capacity
Renter households	ACS B25003	Adaptive Capacity
Adults without a 4-yr degree	ACS B15002	Adaptive Capacity
Households with limited English proficiency (LEP)	ACS C16002	Adaptive Capacity
Persons with disabilities	ACS B18101	Adaptive Capacity
Youth (0-17)	ACS B01001	Sensitivity
Older adults (65+)	ACS B01001	Sensitivity

Source: (City of Vancouver, 2022)

The Equity Index results show communities with higher Equity disparities along Fourth Plain Boulevard such as Maplewood, Meadow Homes, and Baley Downs neighborhoods. See Exhibit 20.

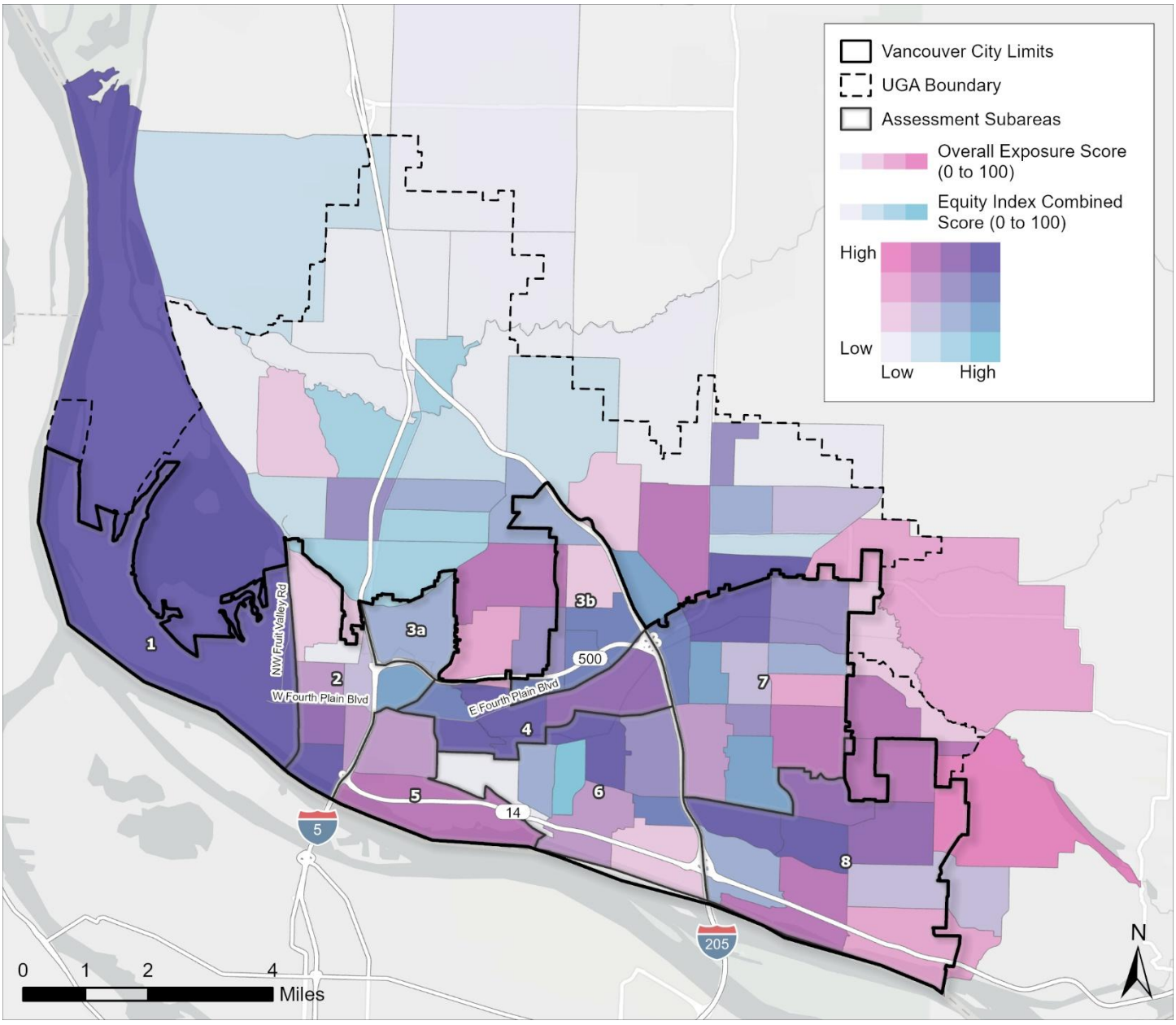
Exhibit 21: Equity Index Score for Vancouver



Source: (City of Vancouver, 2022): BERK 2025.

Considering both climate exposure and equity, the bivariate analysis shows areas with higher scores on both indices. A closer review of conditions and strategies include locations such as Vancouver Lake and NW Fruit Valley Road, Census tracts south of SR 500 and along Fourth Plain Boulevard as well as neighborhoods in southeast Vancouver. See Exhibit 21.

Exhibit 22: Climate Exposure + Equity Index



Source: (City of Vancouver, 2022); BERK 2025.

Health Index + Climate and Health

Some attributes shown in the literature to correlate to higher sensitivity are asthma, chronic obstructive pulmonary disorder (COPD), diabetes, heart disease, poor physical health, and poor mental health. These data points were available at the tract-level from the Centers for Disease Control (CDC Places). See Exhibit 22.

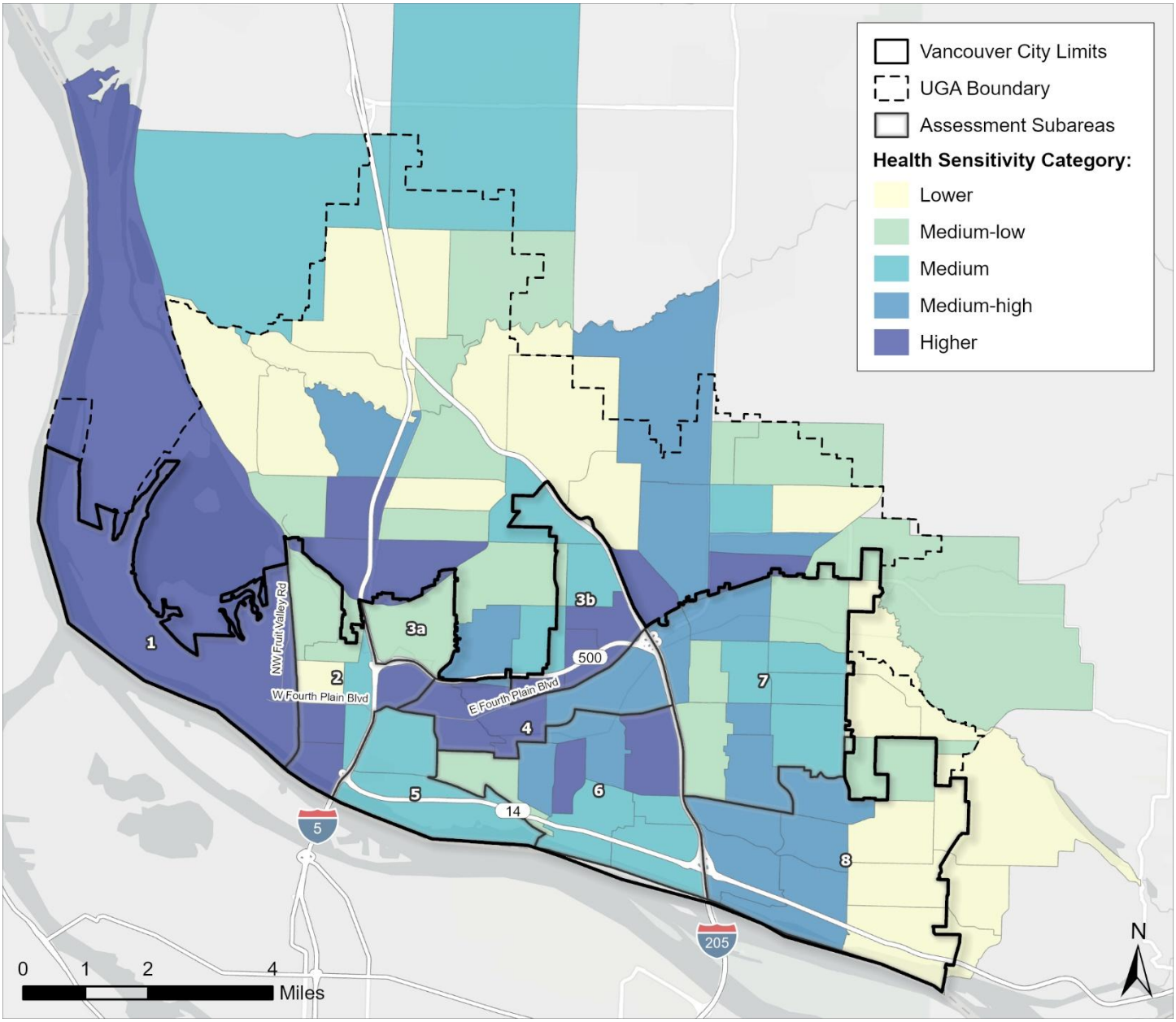
Exhibit 23: Health Data Considered in Health Index

Indicator	Variable Name	Definition
Health Insurance Access	CDC Places	Model-based estimate for crude prevalence of current lack of health insurance among adults aged 18-64 years, 2021
Hypertension	CDC Places	Model-based estimate for crude prevalence of high blood pressure among adults aged >=18 years, 2021
Asthma	CDC Places	Model-based estimate for crude prevalence of current asthma among adults aged >=18 years, 2021
Coronary Heart Disease	CDC Places	Model-based estimate for crude prevalence of coronary heart disease among adults aged >=18 years, 2021
COPD	CDC Places	Model-based estimate for crude prevalence of chronic obstructive pulmonary disease among adults aged >=18 years, 2021
Diabetes	CDC Places	Model-based estimate for crude prevalence of diagnosed diabetes among adults aged >=18 years, 2021
Poor Mental Health	CDC Places	Model-based estimate for crude prevalence of mental health not good for >=14 days among adults aged >=18 years, 2021
Poor Physical Health	CDC Places	Model-based estimate for crude prevalence of physical health not good for >=14 days among adults aged >=18 years, 2021

Source: CDC Places, 2021.

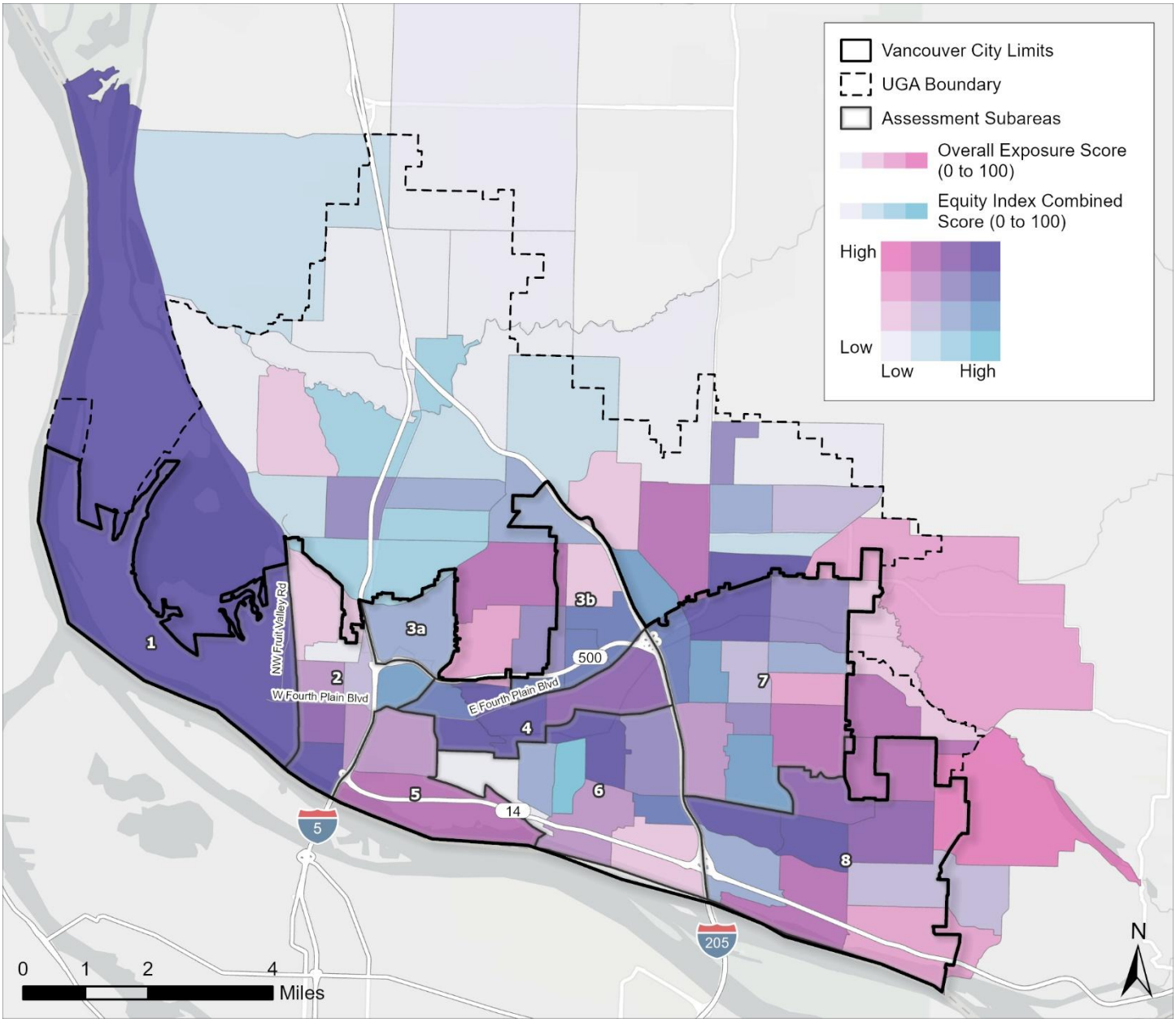
Health Index results are similar to Equity Index results with populations having more sensitive health conditions in west and central parts of Vancouver. See Exhibit 23 for the Health Sensitivity Index and Exhibit 24 for a bivariate Exposure and Health Sensitivity map.

Exhibit 24: Health Index – Vancouver



Source: CDC Places, 2021; BERK Consulting, 2025.

Exhibit 25: Exposure and Health Index – Bivariate Map



Source: BERK Consulting, 2025.

3. Residents Vulnerable to Climate Change Impacts

People Vulnerable to Climate Change

Vancouver is home to 202,600 residents (OFM 2024). It is a growing community along the Columbia River and the Portland Metro area. While vibrant with opportunities, some socioeconomic factors may result in Vancouver communities having more challenges when coping with climate hazards and impacts:

- Over 15% experience poverty
- About 15% identified that they have a disability
- 8.3% are without health insurance
- 1 out of 5 speak a language other than English at home
- 32.5% are non-White residents

Source: ACS 2017-2021 per **OUR VANCOUVER** Equity Analysis, March 2024

Vancouver's share of populations with these characteristics are higher than the shares for Clark County and the State of Washington.

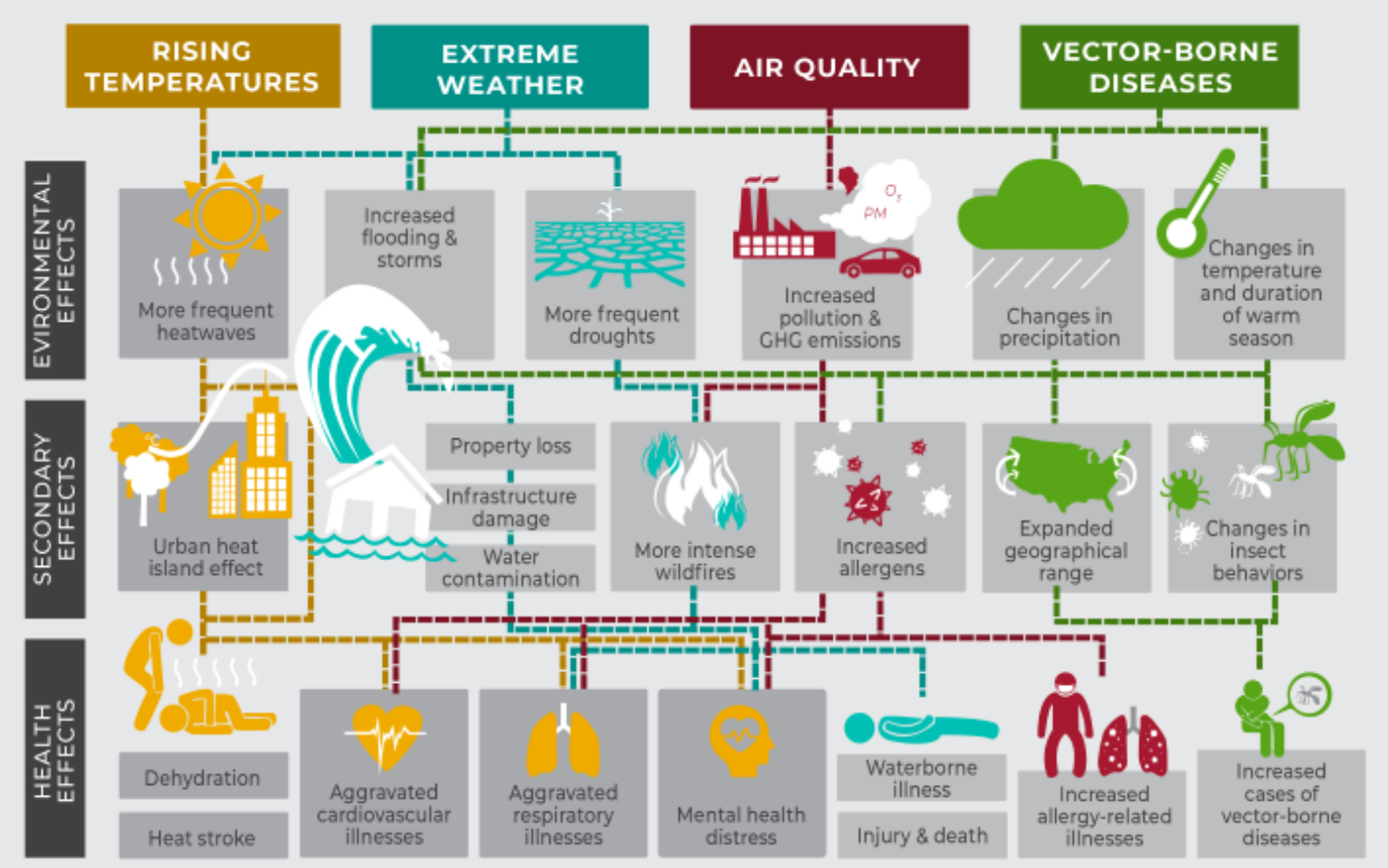
Communities that tend to be more vulnerable to climate change related impacts are those that are already at health, social, and economic risk, including older people, children, low-income families, persons of color, and immigrant communities. (EPA, 2021)

- Persons that are elderly may have more limited mobility or preexisting health conditions, and children under 5 years old may have a harder time regulating temperature and may have underdeveloped immune systems.
- Low-income households may be more susceptible to illnesses and have limited resources to adapt or respond to climate change.
- Communities of color may have cumulative exposures to pollution and health and social disparities.
- Persons that speak English less than very well may have more difficulties during evacuation and difficulties accessing post-disaster funding.

Sources: (Yu, 2021) (Hayden, 2023)

A graphic summary of how climate change affects health is in Exhibit 25.

Exhibit 26: How Climate Change Affects Health



Source: (American Public Health Association, 2024)

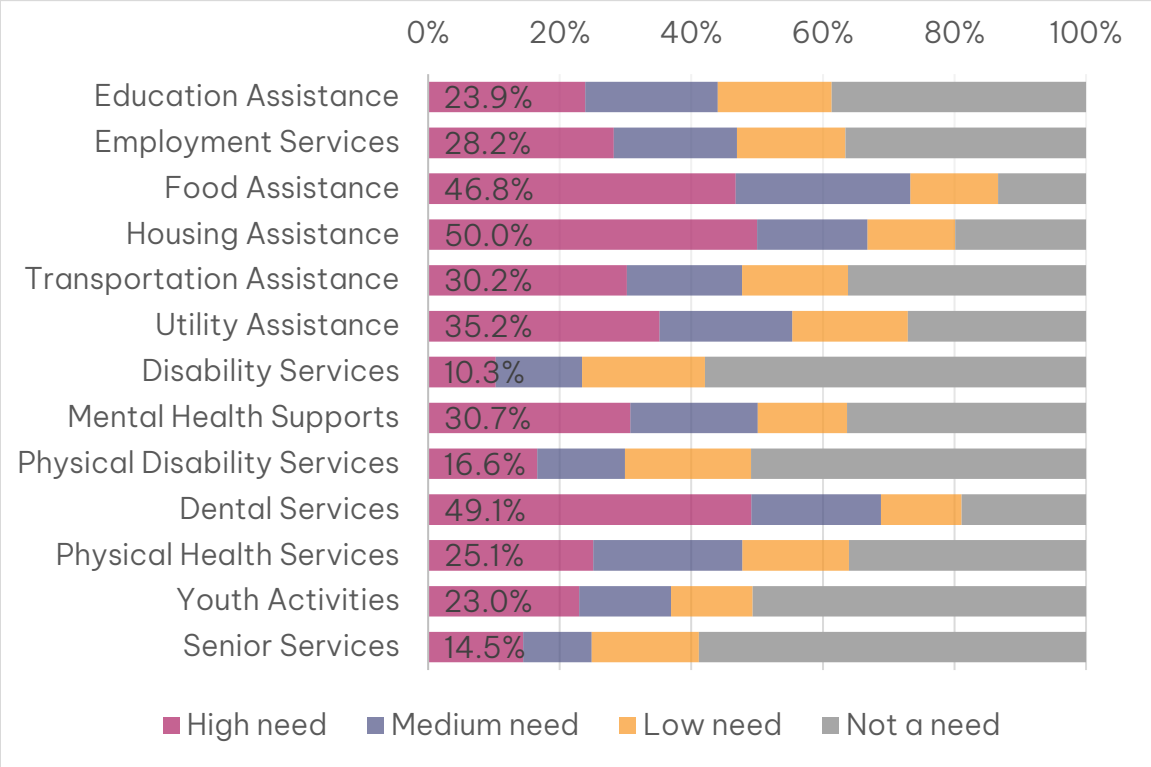
Health Sensitivities

Some health attributes that correlate to higher sensitivity are asthma, chronic obstructive pulmonary disorder (COPD), diabetes, heart disease, poor physical health, and poor mental health. Using the Centers for Disease Control (CDC) Places information at a census tract level, a health index was developed for the purposes of this study. See Exhibit 23 in the prior chapter. These persons may be more vulnerable to climate change hazards.

Vancouver residents participated in a Clark County Health community needs assessment in 2023-2024. See Exhibit 26. Results showed the types of economic and physical challenges that predispose populations to climate vulnerability and offer areas of focus to improve resilience:

- Higher needs – assistance with housing, food, transportation, and utilities
- Moderate needs – support with dental, mental, and physical health services

Exhibit 27: Clark County Needs Assessment Survey 2024: Vancouver Respondent Findings



Source: Clark County Public Health, March 2024

Capacity to Adapt and Equity

Populations in Vancouver with potential socioeconomic disparities include persons in poverty, persons with disabilities, renter households, persons with high school or less education, and persons of color. These populations may have less resources to prepare for or respond to climate impacts. For example, in the Northwest United States, an EPA study in 2021 found that those with lower incomes are much more likely than those with higher incomes to have the highest labor hour losses among weather-exposed workers. BIPOC populations were more likely to have new asthma diagnoses due to particulate air pollution which can be exacerbated by climate change. (EPA, 2021) Vancouver's Equity Index considers the relative concentrations of these populations by Census block. Areas with populations that may have Equity disparities include Fruit Valley and Fourth Plain Blvd. See Exhibit 20 in the prior chapter.

Engagement with underserved community members could help surface priorities for investment in public services as well as locations needing more investment in amenities like parks, tree canopy, services, stormwater treatment, sidewalks, and others.

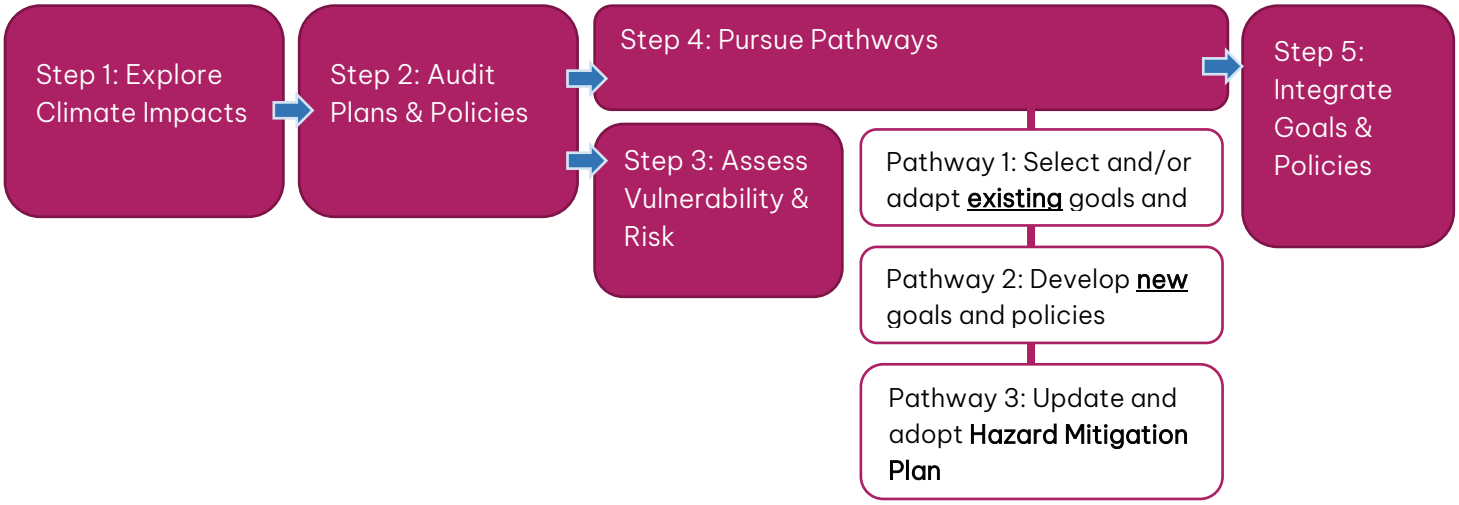
4. Planning for Climate Change

Growth Management

The State legislature passed HB 1181 requiring a Climate Change & Resiliency Element. The element is to provide actions to reduce GHG emissions and per capita VMT. The element also must "equitably enhance resiliency to, and avoid or substantially reduce the adverse impacts of, climate change in human communities and ecological systems through goals, policies, and programs." The goals, policies and programs should be based on the best available science and credible climate projections and impact scenarios. Both the GHG reduction sub-element and the resiliency sub-element must prioritize GHG reductions and climate resilience actions that benefit overburdened communities.

The State of Washington Department of Commerce has developed guidance (Commerce, 2023) to develop the climate element including both GHG reduction and resiliency sub-elements. This document provides a Vancouver Climate Vulnerability Assessment consistent with Steps 1 through 3. A separate policy evaluation recommends adapting existing or proposing new goals and policies to address Steps 2 and 4. See Exhibit 27.

Exhibit 28: Climate Resilience Sub-Element Steps – Washington Department of Commerce



Source: (Commerce, 2023)

This Vulnerability Assessment addresses Resilience sub-element step 3. Regarding the GHG sub-element, the City has developed GHG emission reduction goals in a Climate Action Framework and has inventoried GHG emissions. The City is in the progress of developing per capita VMT goals with the Comprehensive Plan periodic update.

Related Vancouver Climate Planning Efforts

Climate Action Framework (2022)

In December 2022 Vancouver adopted a 2040 goal to be carbon neutral. A range of strategies was developed to address GHG reductions across energy, transportation, solid waste, and land use sectors, and build capacity with the city government as well as engage equitably with the community. Strategies are listed below. A wide range of actions were identified to implement each strategy.

- Strategy EQ-1. Enhance resilience of overburdened communities
- Strategy EQ-2. Build a more community-driven, circular economy
- Strategy EQ-3. Support growth of the green technology workforce
- Strategy BE-1. Increase use and storage of renewable energy while reducing consumption
- Strategy BE-2. Decarbonize homes, businesses, and other buildings
- Strategy TLU-1. Create neighborhoods that support clean modes of transportation
- Strategy TLU-2. Shift driving trips to clean, active modes of transportation
- Strategy TLU-3. Decarbonize and electrify vehicles
- Strategy TLU-1. Create neighborhoods that support clean modes of transportation
- Strategy TLU-2. Shift driving trips to clean, active modes of transportation
- Strategy NS-1. Increase carbon storage in trees, vegetation, and soil
- Strategy NS-2. Improve ecosystem resilience
- Strategy NS-3. Conserve Water Resources
- Strategy SW-1. Require recycling and organic material management
- Strategy SW-2. Zero out wastewater emissions
- Strategy GOV-1. Mainstream sustainability at the City, including staff capacity

The City is implementing the strategies and actions and monitoring GHG emissions to achieve the ambitious overarching goal of carbon neutrality.

Climate Adaptation Strategy (2022)

The Vancouver Climate Adaptation Strategy was developed for the City by Hatch Planning associated with Portland State University. The report was intended to guide climate adaptation policies, and with the results of engagement – a survey, six pop-up events, and five focus groups – identified the following recommendations:

> **1. Climate-Ready Communities** - Provide essential services for communities to increase resiliency, and expand and increase inclusive access to services. Cultivate community connections to build resilient communities.

2. Communication and Education - Increase community-wide awareness of climate adaptation strategies and available resources. Foster communication and collaboration between the City and residents, and among residents and community organizations.

3. Green Infrastructure - Bolster green infrastructure in the urban environment that reduces urban heat island effects and mitigates poor air quality. Install green infrastructure in the built environment to increase the resiliency of structures.

4. Land Use and the Built Environment - Implement sustainable land use policies to address changing climate conditions. Promote building and development standards for public and private facilities.

5. Food Security - Increase equitable access to food in the face of rising food prices and insecurity. Promote self-sufficiency through local food production.

6. Governance - Institutionalize climate adaptation strategies among City departments.

Equity and Displacement Indices

Vancouver has developed the Vancouver Equity Index to understand communities and places that have had less investment and are underserved. This can inform policy, budgets, and programs. In addition, Vancouver developed a Displacement Index to identify places in Vancouver experiencing or likely to experience displacement due to redevelopment or due to the expense of housing. This tool is used to inform the City's Comprehensive Plan to avoid impacts where possible and to develop anti-displacement policies.

The Reside Vancouver, Anti-Displacement Strategy, contains four strategies: people, preservation, production, and prosperity. Underneath these strategies are the following recommended actions:

- Manufactured Dwelling Park (MDP) Zoning
- Right of First Refusal
- Anti-Displacement Impact Assessments
- Rental Registration Program
- "Qualified" Local Small Businesses in Public Procurements
- Joint-Labor Management and Job Training Partnerships
- Community Investment Trusts

Some Reside Vancouver strategies could support economic development and zoning and development climate strategies, such as green technology jobs and building quality housing that meets environmental health standards. (Thread Community Planning, 2023)

OUR VANCOUVER - COMPREHENSIVE PLAN 2045 – Climate Planning

The City is currently updating its comprehensive plan to encourage a connected and accessible. Per the City's approach (City of Vancouver, WSP, 2024) this means the following:

- Accessibility focuses on universally designed places, and the ability for all residents regardless of physical or neural capabilities or incomes to be well served by their built environment.
- Connectivity is intended to communicate how people are connected to services and amenities in neighborhoods, as well as how neighborhoods connect and inter-relate to one another.

The plan will review active trip potential to improve connectivity and increase bicycle and pedestrian trips. The City is evaluating these growth strategies for their ability to provide lower per capita GHG emission and VMT. The land use plan will be supported by a climate change and resilience element per HB 1181.

Community Health

Overburdened Communities Highly Impacted by Air Pollution

Communities across Washington State are exposed to air pollution from stationery, mobile, and other environmental sources. Vancouver was identified as a potentially overburdened community by the Washington State Department of Ecology in its 2023 report due to the city's proximity to major interstates like I-5 and I-205, the nearby industrial uses in the City of Portland, exposure to state-wide and regional wildfire smoke, and socioeconomic and demographic factors that exacerbate negative health outcomes. (Washington Department of Ecology, 2023) (Ecology W. D., 2024)

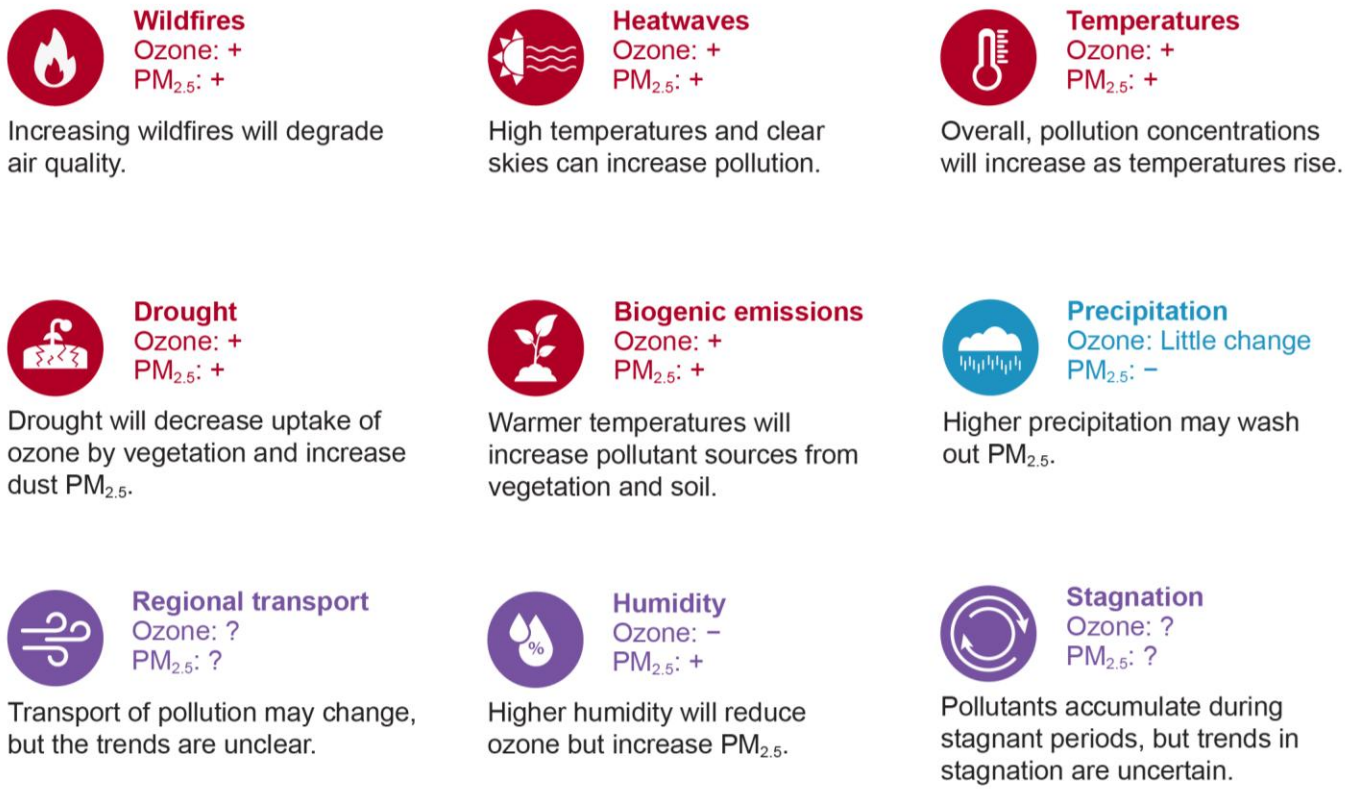
Poor air quality has been linked to negative health outcomes and in overburdened communities. The following impacts are more common in overburdened communities and can be linked to high concentrations of criteria pollutants:

- Heart and lung disease at higher rates than state average
- 2.4 year lower life expectancy than state average
- Older adults in overburdened communities highly impacted by air pollution were twice as likely to die from illnesses linked to breathing fine particles ($PM_{2.5}$) from human-caused sources than the statewide average.

- Older adult people of color have a higher risk of death from breathing fine particles ($PM_{2.5}$) compared to older white adults in the same area. (Washington Department of Ecology, 2023)

Climate change can directly degrade air quality such as during extreme heat events, causing ozone levels to be higher. Higher PM 2.5 pollution levels could also occur during heatwaves, Increasing wildfires would result in smoke and PM 2.5 exposure. (West, 2023) See Exhibit 28.

Exhibit 29: Climate Change Impacts on Ozone and PM 2.5 over the United States



CAPTION: Climate change is projected to alter concentrations of two key US air pollutants, ozone and $PM_{2.5}$, through several processes. Red icons signify increased ozone and $PM_{2.5}$, and the blue icon denotes decreased $PM_{2.5}$. Plus and minus signs indicate the expected pollutant response to climate-driven changes in meteorology. Question marks and purple icons denote uncertainty in either the response or in how the meteorological process will change with climate change. Given uncertainties and regional differences in pollution responses, the magnitude of these responses is not presented.
Source: (West, 2023)

Ecology intends to place air monitors in overburdened communities and publish biennial reports on community criteria pollution levels, greenhouse gas emissions, and health impacts. The Climate Commitment Act also requires Ecology to develop standards and strategies to reduce the criteria air pollution in overburdened communities highly impacted by air pollution.

Vancouver can coordinate with Ecology as it monitors pollutants and as it implements its Climate Action Framework to reduce greenhouse gas emissions.

Adaptive Capacity Assessment

This report is also in conversation with the City's Adaptive Capacity Assessment (2025), which focused on understanding the systems, resources, and conditions that enable communities to respond to climate hazards. Findings from the Adaptive Capacity Assessment have been integrated—helping to illuminate where and why vulnerability varies, and what additional actions may be needed to support at-risk populations and infrastructure. (City of Vancouver, 2025)

Health Impact Assessment

The City prepared a Health Impact Assessment (HIA) that considers how the growth alternatives studied as part of the **OUR VANCOUVER** Comprehensive Plan periodic update may benefit and impact health in Vancouver as it relates to the built environment.

The HIA also analyzes health-related conditions around these themes:

- Physical Activity
- Food Access
- Community Connections
- Exposure to Health Hazards
- Housing and Financial Security

The HIA addresses impacts from gaps in the built environment for secure and active lives, and access to services important for day to day living, as well as a range of health hazards. Analysis of these conditions has provided a basis for improved policies addressing community health.

Some sectors addressed in this Vulnerability Assessment overlap with the Health Impact Assessment such as Agriculture and Food Systems, Health and Well-being, and Zoning and Development.

Health and climate resilience are considered together in the Comprehensive Plan Update policies.

5. Vulnerability & Risk Assessment

Introduction

This report provides a planning level evaluation of climate impacts in Vancouver. It describes communities, places, and infrastructure that may be more or less vulnerable. It describes current or potential new strategies to enhance Vancouver's resilience. This assessment informs new or amended policies in the Comprehensive Plan periodic update. Data, policies, and implementation strategies would be updated and evolve over time.

The climate impacts and strategies are reviewed across 11 sectors in the following order:

- Agriculture & Food Systems
- Buildings & Energy
- Cultural Resources & Practices
- Economic Development
- Emergency Management
- Health & Well-being
- Ecosystems
- Transportation
- Waste Management
- Water Resources
- Zoning & Development

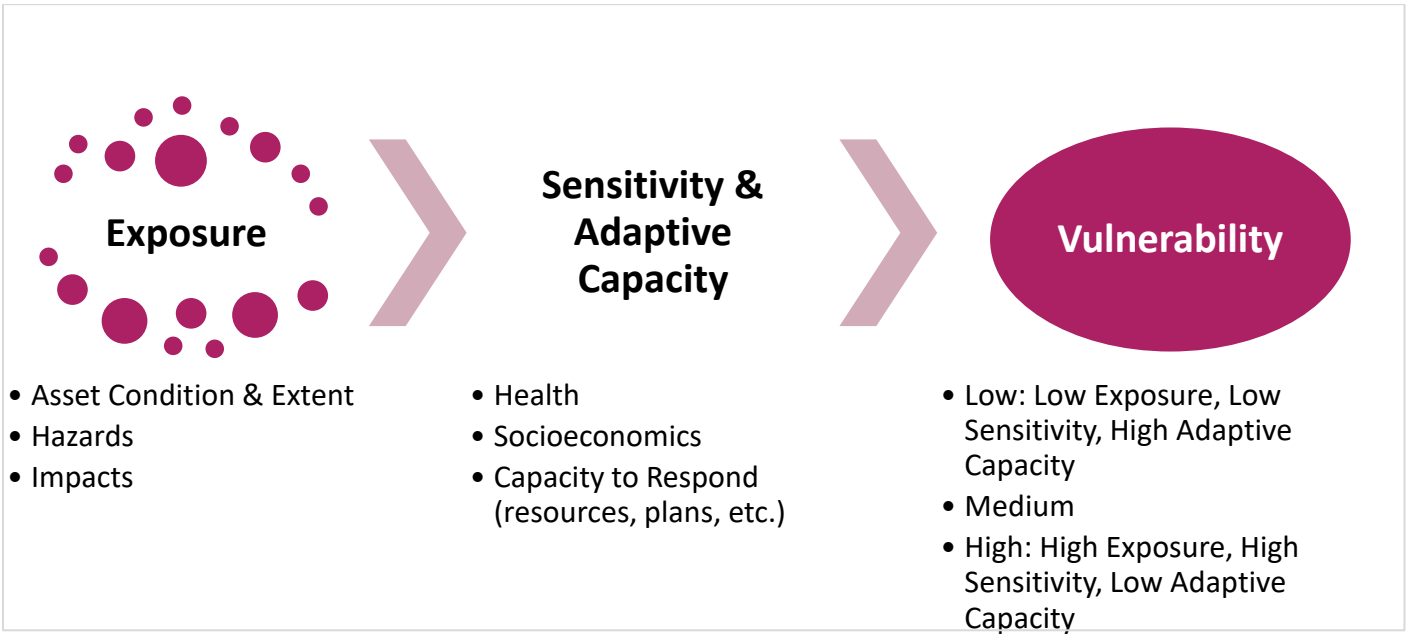
For each sector, the following information is provided:

- Sector Overview and Assets
- Potential Climate Impacts
- Adaptive Capacity
- Vulnerability Summary
- Gaps and Opportunities

The Vulnerability Summary is based on criteria described below.

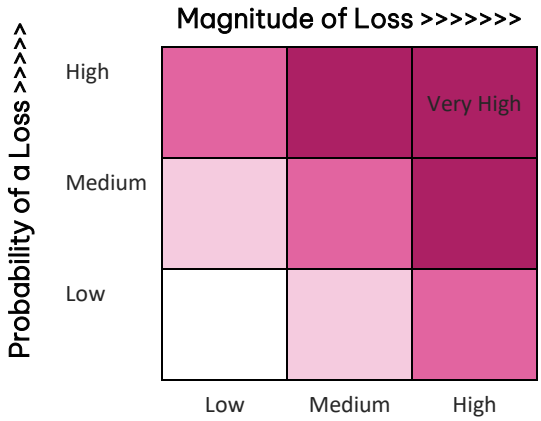
Vulnerability Criteria: Under each sector, the Census tracts or Areas (1 through 8) with higher exposure, higher sensitivity, or lower adaptive capacity are identified. Key indicators or assets that are most impacted are also considered. See Exhibit 29. These planning level considerations of vulnerability and risk can help Vancouver identify and prioritize policies and development regulations. Also see a Climate Resilience Policy Evaluation available under separate cover.

Exhibit 30: Assessment of Climate Vulnerability



Source: (US Climate Resilience Toolkit, 2024), BERK 2025.

Risk Criteria: Under each sector, a summary of Risk is provided considering likely climate impacts in 10+ years, magnitude of loss, extent of City responsibility, and effect on vulnerable communities. (See sidebar on following page.)



RISK: PROBABILITY AND MAGNITUDE

Probability is the potential that the impact would occur during the 20-year planning period, and is informed by the Natural Hazards Mitigation Plan (Clark Regional Emergency Services Agency, 2023), University of Washington Climate Impacts Group resiliency mapping tool (Raymond, Climate Mapping for a Resilient Washington, 2022), and other literature.

Probability is based on whether climate impacts have occurred or are possible during the short term (5 years), medium term (10 years), and long term (20 years).

- All sectors would be impacted by extreme heat and wildfire smoke or worsening air quality, and these impacts have occurred and are most likely to occur in the next 5-10 years making them a medium or high probability.
- Severe flooding in the 100-year floodplain is a lower probability given the limited floodplain and flood protection infrastructure, but urban stormwater impacts are more likely at least with a medium probability in the next 10 years.

Magnitude would vary across the landscape and by sector, and considers:

- The potential for multiple climate impacts.
- The City's responsibility for system management or recovery needs.
- Whether costs would broadly affect vulnerable populations (extent or numbers) including those with health sensitivities or low resources (adaptive capacity).

Agriculture & Food Systems

Sector Overview and Assets

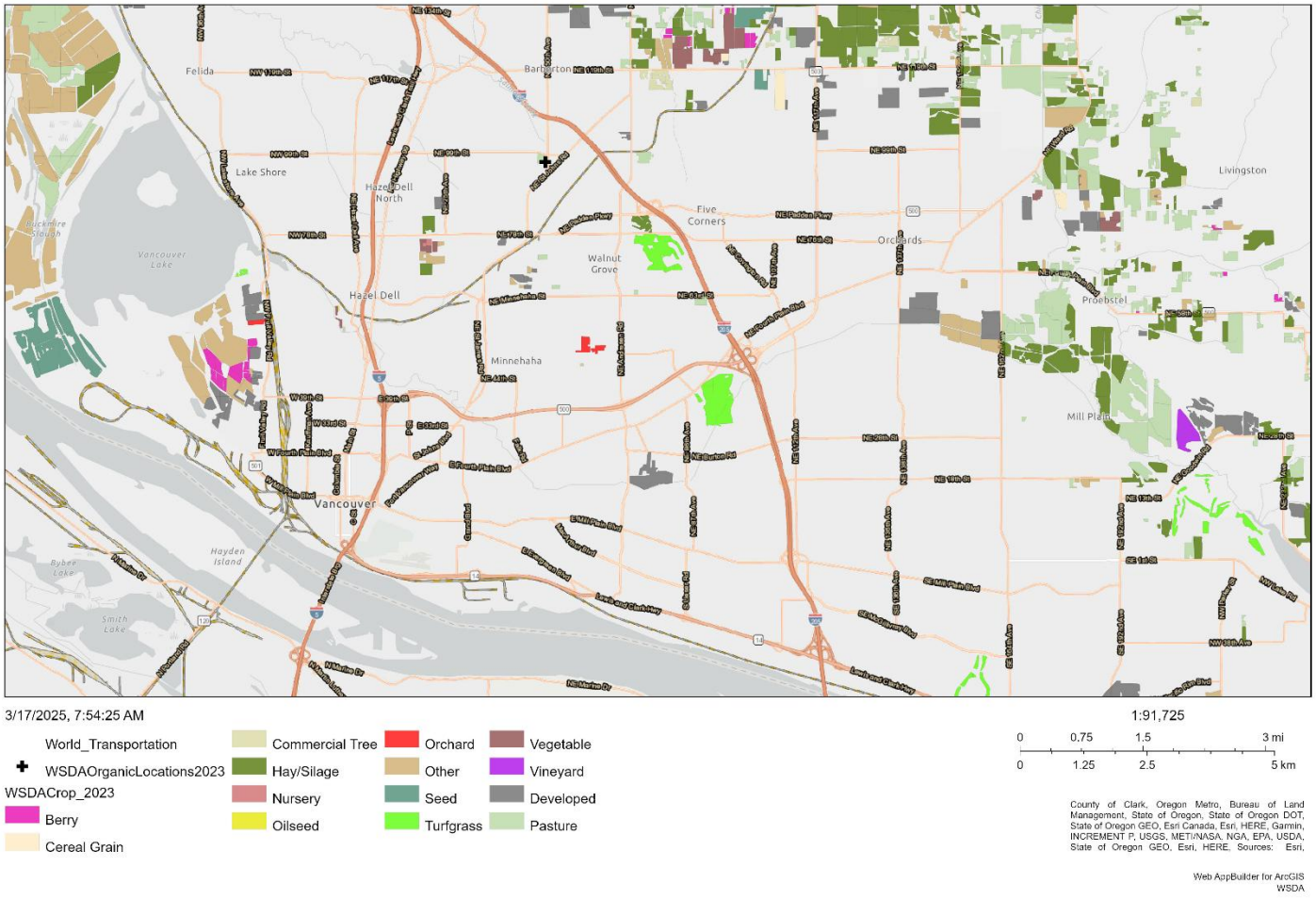
The food system in Vancouver is comprised of various sites and services: places to buy food, such as grocery stores and farmers markets; services combating food insecurity, such as food pantries and free and reduced school lunches; opportunities for food growing and urban foraging, such as gardens and fruit-bearing trees; and the supply chain systems that transport and process food. There is only a small amount of urban agriculture within Vancouver, but Clark County has an active farming community that serves the city through area farmer's markets and community supported agriculture programs, where households can buy a share of produce during the growing season.

The Clark County Community Needs Assessment survey, conducted by Clark County Public Health in 2024, found that food assistance and access to fresh and healthy foods were among the top physical health services needs for Vancouver respondents (Clark County Public Health, 2024).

Key assets for agriculture and food systems in Vancouver include:

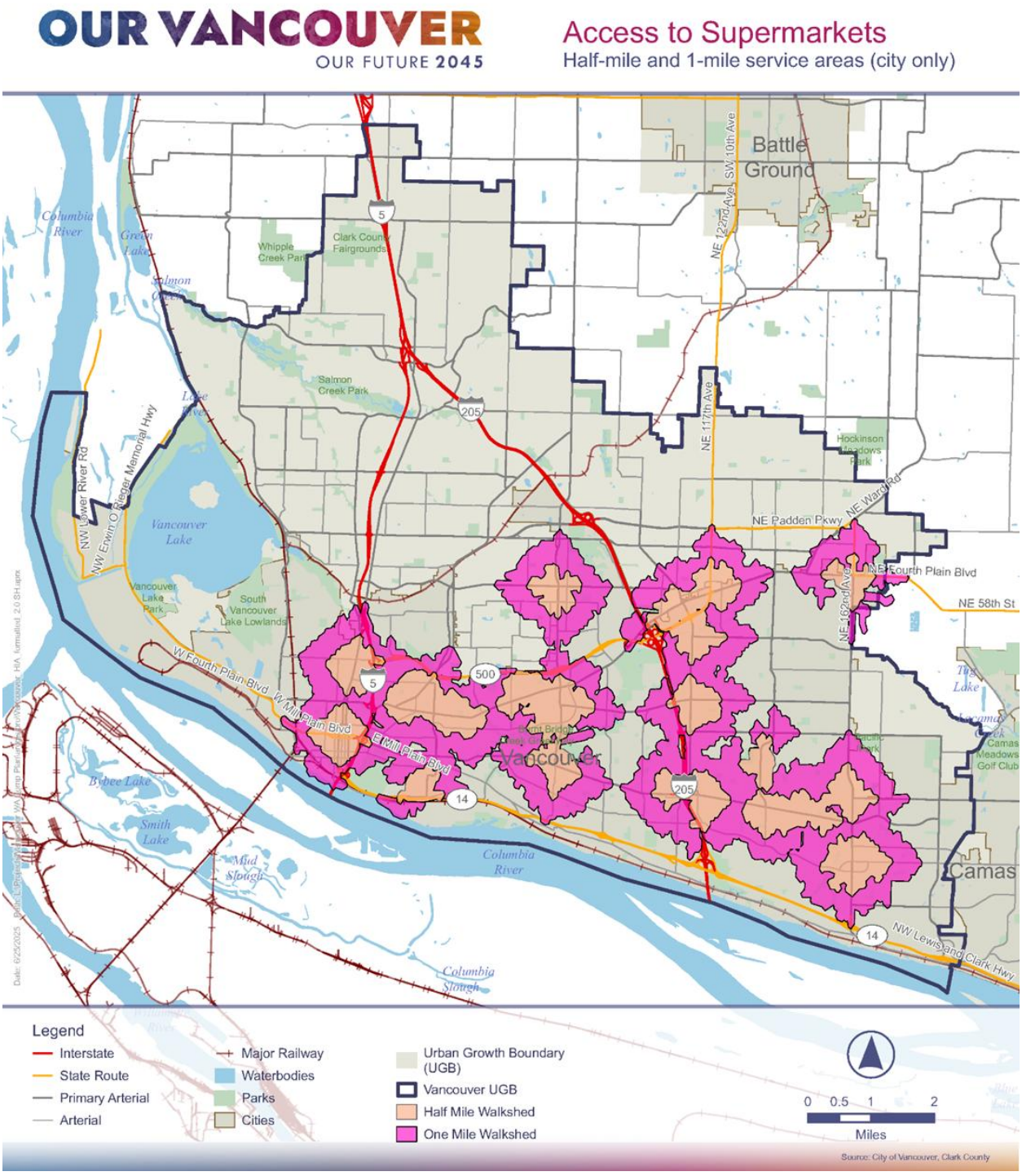
- A small amount of urban agriculture, mostly located near Vancouver Lake (Area 1) and along NE Fourth Plain Boulevard (Area 7) (see Exhibit 30)
- Farmer's markets, including the Downtown Market (year-round) and East Vancouver Market (seasonal)
- Community Supported Agriculture (CSA) programs (generally offered by farms outside of city limits)
- City community gardening program (five sites across the city including Areas 1, 4, 5, 6, 7)
- Grocery stores (see Exhibit 31)
- Food pantries (operated by Clark County Food Bank and partner organizations—see Exhibit 32)
- Food transportation and supply chain
- School lunch programs, including free and reduced school lunches
- Home gardens
- Fruit-bearing trees in the right-of-way and in parks

Exhibit 31: Agricultural Inventory – Vancouver Vicinity



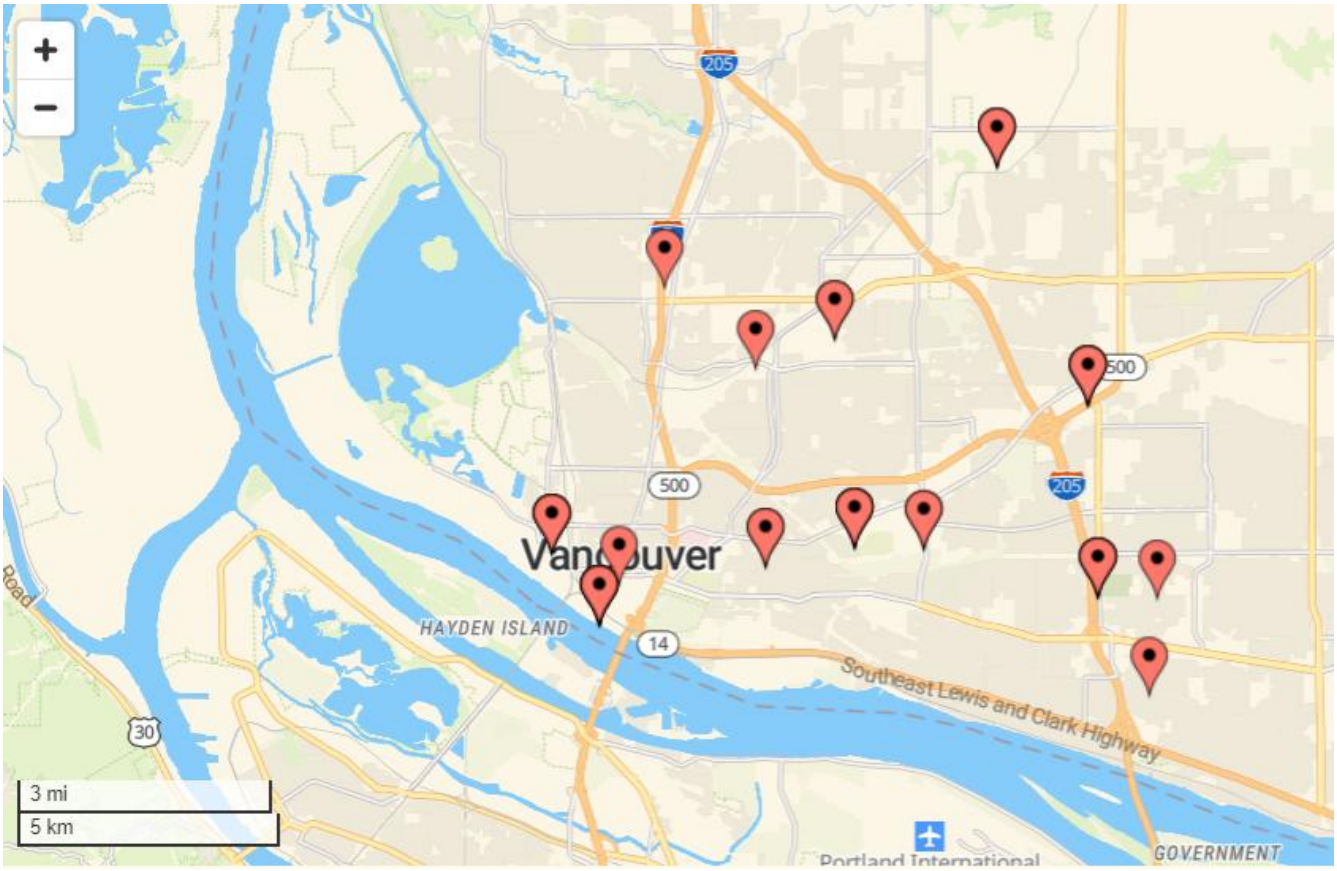
Source: (Washington State Department of Agriculture, 2023)

Exhibit 32: Supermarket Access



Source: WSP 2024, BERK 2024.

Exhibit 33: Clark County Food Pantry Sites



Source: (Clark County Food Bank, 2024)

Potential Impacts

Heat, extreme precipitation, flooding, drought, wildfire, and smoke are all expected to impact food systems in Vancouver, including crop viability and watering costs, health of farmers and gardeners, demand for food banks and other resources, costs for operating grocery stores, logistics for the transportation of food, and farmers market operations.

- Extreme heat and drought can stress plants in farms and gardens, as well as public fruit-bearing trees, affecting yields, viability of urban agriculture, and availability of some local food items. Watering costs also increase in such events, impacting producers and possibly resulting in higher food prices. Extreme precipitation and flooding events could also result in crop loss. While much of the city is likely to be exposed to similar levels of drought and extreme heat, agriculture is highly sensitive and primarily located on the west side. The west and central areas of the city are also more exposed to extreme precipitation and flooding.

- Extreme heat can increase the cost of food refrigeration for businesses and households. This can impact several links of the food system, including harvesting, transportation, distribution, and household use.
- Unsafe temperatures and smoke can impact the work and wellbeing of farmers, gardeners, and city maintenance staff, who work outside. These events can also result in cancelled outdoor farmers markets, and food banks may become more crowded as extreme weather refuges for those who are experiencing housing insecurity. Individuals without a vehicle may also be unable to safely travel to get food.
- Wildfire and flooding may affect some food transportation routes at a regional level, impacting the logistics of food businesses in Vancouver. Local flooding could also impact household access to grocery stores.
- Areas near Vancouver Lake and on the eastern edge of the city are within the wildland urban interface and may be susceptible to wildfire, including the city's primary area for urban agriculture on the west side.
- Assets like grocery stores may be less sensitive to climate impacts than agriculture, which is highly dependent on predictable weather patterns and less able to recover from shocks. Therefore, the west area of the city, where most of the urban agriculture is located, may be more sensitive than other areas.

Adaptive Capacity

Adaptive capacity of food systems in Vancouver varies by asset type.

Food banks, SNAP support, and free and reduced school lunch programs already see a lot of demand in Vancouver: 15.5% of households receive Supplemental Nutrition Assistance Program (SNAP) support (American Community Survey, 2022). In the 2021-2022 school year, 48% of students in Vancouver received free and reduced lunch (Design Workshop, 2024). If food costs increase due to the impacts of climate change on agriculture, many households will struggle to keep up with the rising prices. The Clark County Food Bank has recently completed a new facility, which could allow them to expand their programs.

The City's community gardening program and other programs that support hyperlocal food production and distribution could make communities more resilient to supply chain shocks, and resulting cost increases, from regional, national, and international climate impacts. Slow Food Southwest Washington has an Urban Abundance program, which supports Vancouver and nearby communities in creating publicly-accessible food-scapes and gleaning and donating food that would otherwise go to waste (Urban Abundance, 2024).

Climate events that impact transportation, such as by making it unsafe to walk or wait at a bus stop, would be harder to adapt to for parts of the city that do not have access to grocery stores within one mile. See Exhibit 31.

Food production in Vancouver may have more flexibility to adapt to drought conditions, by increasing watering, than extreme heat, smoke, and extreme precipitation.

Vulnerability Summary

Hazards affecting the citywide food system include extreme heat, drought, flooding and extreme precipitation, and wildfire smoke. While the whole city is exposed to these hazards, urban agriculture is generally more sensitive to climate events than assets such as grocery stores. See Exhibit 33 for a summary of vulnerability to agriculture and community gardens.

Area 1 has urban agriculture and a community garden (Fruit Valley) and is exposed to a higher risk of extreme heat and flooding. Area 4 has a community garden (Campus) but no known commercial agriculture; it has a medium-high risk of exposure. Other areas with the presence of community gardens include Areas 2 (Marshall), 5 (Fort Vancouver) and 7 (LeRoy Haagen). Areas 3b and 7 also have limited agriculture. However, the Census tracts in areas 3b, 5, and 7 have less exposure to hazards.

Exhibit 34: Vulnerability by Census Tracts – Agriculture and Community Gardens

Census Tracts	Area	Heat	Flooding/ Precipitation	Smoke/ Air Quality	Overall Exposure	Health Conditions	Equity Index	Agriculture, Community Garden
53011041005	1	Higher	Higher	Lower	Higher	Higher	Higher	Ag, Gar
53011041800	2	Medium-low	Medium-low	Medium-low	Medium-low	Higher	Higher	Gar
53011041107	3b	Medium	Lower	Medium-low	Medium-low	Lower	Medium-low	Ag, Gar
53011041600	4	Medium	Medium-high	Medium-high	Medium-high	Higher	Higher	Gar
53011042602	5	Medium	Medium	Medium	Medium	Medium	Medium-low	Gar
53011041207	6	Medium	Medium	Medium	Medium	Medium	Higher	Gar
53011041326	7	Lower	Medium	Medium	Medium-low	Medium-low	Medium	Ag
53011041337	7	Medium-low	Lower	Medium-low	Medium-low	Medium-high	Medium-high	Gar

Legend: Ag = Agriculture, Gar = Garden
Source: See Chapter 2 for indicators and methods. BERK, 2025.

In summary, the area most affected with agricultural assets and heat and flooding exposure is Area 1 as described above. Area 1 contains some vulnerable communities and abuts other

vulnerable communities in Area 2. Area 3b has exposed agricultural and garden assets but medium low or lower populations with health sensitivity or equity disparities; thus, Area 3b is not highlighted in the summary of risk.

Exhibit 35: Risk Summary – Agriculture Sector



Source: BERK, 2025.

Gaps and Opportunities

Strategies to Improve Adaptive Capacity

Based on the Asset Mapping Assessment and climate planning engagement, following are some strategies to address agriculture and food systems:

- Pilot edible rain gardens or de-paving projects near NE Fourth Plain to support food access and manage stormwater runoff (City of Vancouver, 2025)
- Provide food forests or edible landscapes in heat-impacted neighborhoods. (City of Vancouver, 2025)
- Consider opportunities to combine adaptation and food security efforts, such as through increasing the urban tree canopy with plantings of fruit and nut trees when/where appropriate. Plantings should be coordinated with fruit and nut tree maintenance education programs (e.g. plantings on public school properties) to relieve burden on Public Works. (Hatch Planning and City of Vancouver, 2022)

Discussion: City staff who maintain fruit and nut trees on public property could be a source of information on the City's current inventory of food-producing trees, how the food is harvested and used, and resilience considerations for these assets. The school district could also be a connection point as many children in Vancouver qualify for free and reduced school lunches, making school a key food source.

Policies

A policy audit of City plans to support the **OUR VANCOUVER 2045** periodic update showed limited policies addressed agriculture and food systems in the context of climate hazards. The audit suggested policy revisions such as:

- Address affordability of healthy food and support of healthy food in schools or other programs.
- Add more specific policy language about actions to support food security.
- Address resilience of plants and trees that support local fruit and nut production on public property.

The **OUR VANCOUVER 2045** effort is developing policies incorporating these concepts to address these findings in the Climate Vulnerability Assessment and the related Health Impact Assessment:

- Expanding access to community gardens and incentivizing urban agriculture to improve food security and increase healthy food options. (Policy 32)
- Incentivizing and removing regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods. (Policy 78)

Another policy that supports stormwater management and de-paving, which is also an opportunity for the co-benefit of food security with edible raingardens, includes:

- Focus on improving water quality and prevent flooding through managing stormwater flows, encouraging natural filtration of precipitation to ground water, reducing runoff, mitigating flood risks by advancing systems that manage stormwater effectively, and enhancing local water quality in the watershed. (Policy 136)

Buildings & Energy

This section addresses energy generation, transmission, and consumption in buildings with a focus on resilience. This section used information from the City of Vancouver Community Profile, Community Atlas, Climate Action Framework, and Climate Adaptation Strategy Policy as well as the County Assessor building data.

Sector Overview and Assets

Buildings

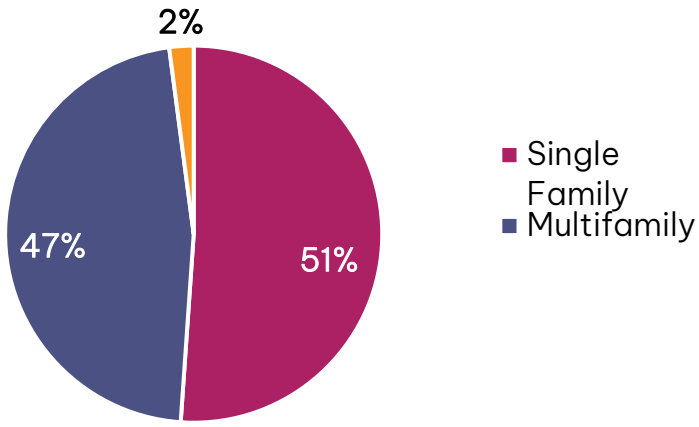
Based on 2024 County assessor data, Vancouver has 57,119 total buildings. Out of that, 93.4% are residential buildings, 4.7% are commercial, and 1.9% are industrial (Exhibit 35). However, 62.3% of total square footage of all Vancouver buildings are residential, while commercial and industrial buildings make up a greater percentage of total square footage than percentage of buildings, at 24.7% and 13.0% respectively (Clark County, 2024). In 2021, there were 83,868 housing units in Vancouver, a 32% increase from 63,620 in 2010 (City of Vancouver, 2022). Out of these housing units, 51.1% are single-family units, 46.8% are multifamily units, and 2.1% are mobile homes (Exhibit 36).

Exhibit 36: Number of Buildings and Square Footage by Residential, Commercial, and Industrial, 2024

	Buildings		Square Footage	
	Number	Percent	Square Footage	Percent
Residential	53,354	93.4%	111,889,986	62.3%
Commercial	2,690	4.7%	44,366,622	24.7%
Industrial	1,075	1.9%	23,259,751	13.0%
Total	57,119		179,516,359	

Source: Clark County Housing Assessor Data, 2024

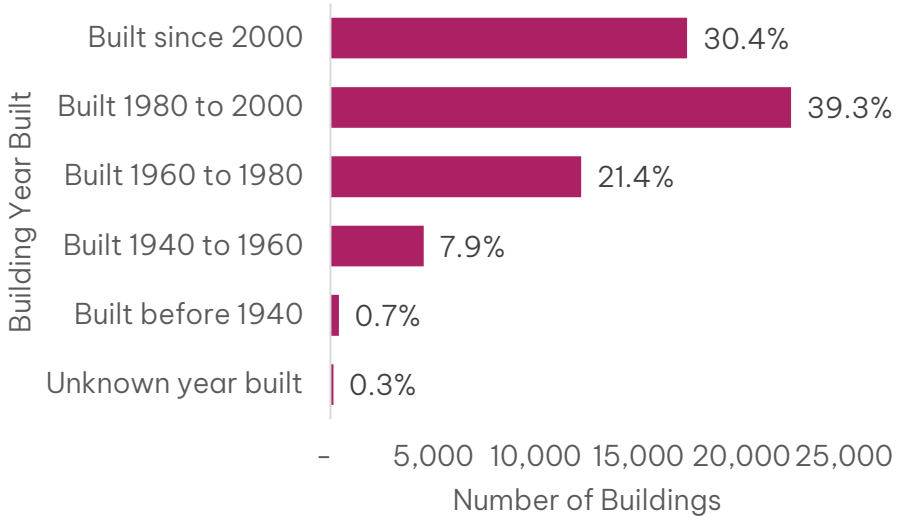
Exhibit 37: Housing Units by Type, 2024



Sources: Postcensal Estimates of Housing Units, Washington State Office of Financial Management, 2024; BERK, 2024.

Vancouver's housing stock is fairly young, as shown in Exhibit 37. The largest percentage of buildings were constructed between 1990 and 1999, and the median year of construction is 1985 (Design Workshop, 2024). 39.3% of all buildings were built between 1980 and 2000, 30.4% were built after 2000, and 21.4% were built between 1960 and 1980. The remaining 8.9% of buildings were built before 1960 or have an unknown age (Clark County, 2024). A share of the housing stock built prior to 1980, about 30% of Vancouver's housing stock, is likely in need of energy efficiency updates as the State Energy Code was adopted in 1985 (Design Workshop, 2024).

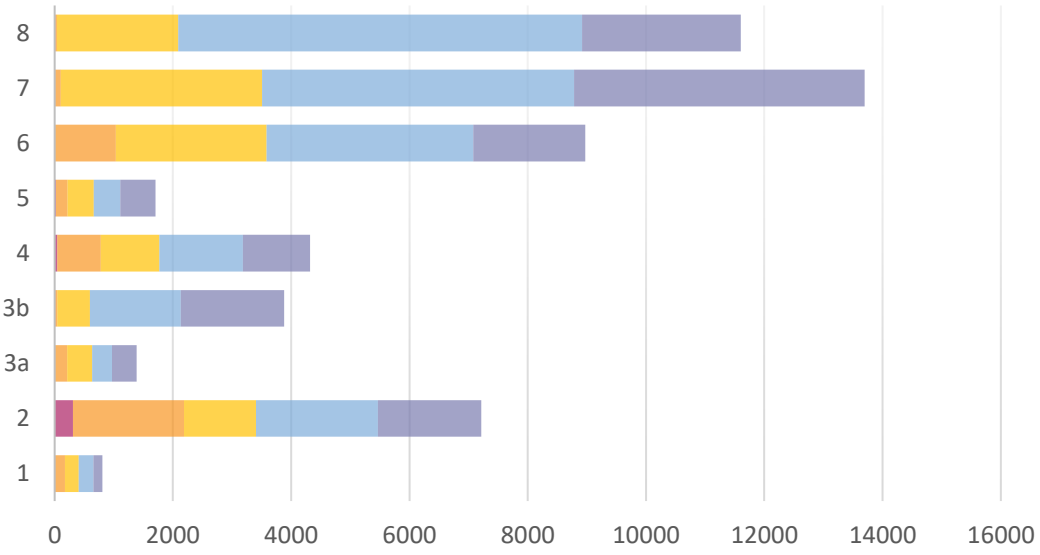
Exhibit 38: Building Age, Residential and Non-Residential, 2024



Sources: Clark County Housing Assessor Data, 2024; BERK, 2024.

Older housing stock is found primarily in 2 and 6, but all areas have housing built prior to 1980. Generally, newer housing has been developed on the east side of the city. Older structures may not be weatherized to address cooling and ventilation. See Exhibit 38.

Exhibit 39: Relative Age of Residential and Non-Residential Buildings by Area in Vancouver

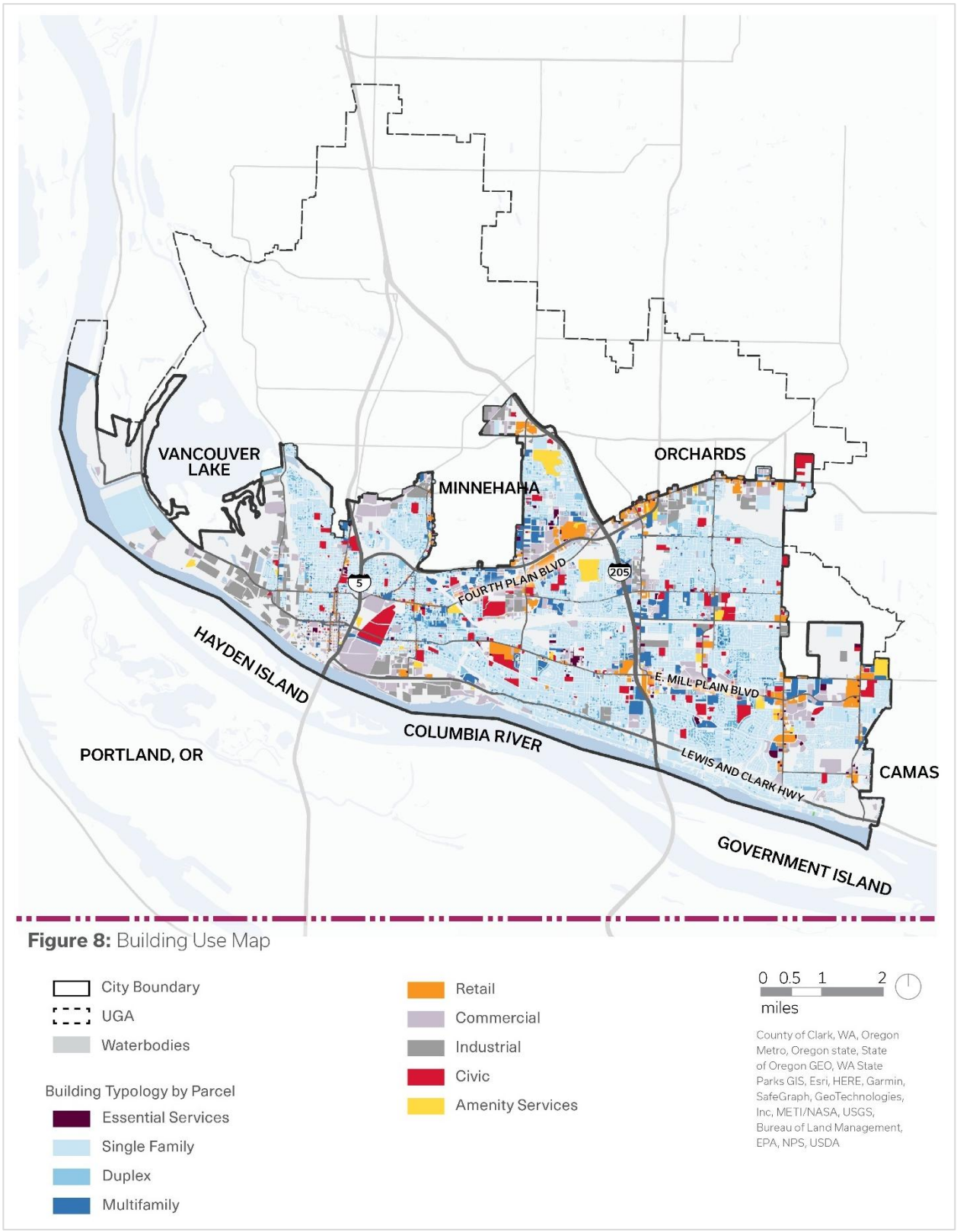


	1	2	3a	3b	4	5	6	7	8
Before 1940	3	307	6	2	43	23	7	6	2
Built 1940-1960	171	1882	204	42	735	193	1028	98	37
Built 1960-1980	233	1213	423	551	991	447	2548	3405	2048
Built 1980-2000	246	2065	338	1538	1411	447	3496	5274	6830
Built since 2000	155	1748	414	1748	1139	593	1891	4914	2685

Sources: Clark County Housing Assessor Data, 2024; BERK, 2025.

Buildings in Vancouver include residential uses (single-family, duplex, multi-family), essential services, retail, commercial, industrial, civic, amenity services, and parks and recreation. As indicated in the building use map, the predominant portion of parcels are residential uses, either single-family or duplex residences. However, there are concentrations of multi-family units along the Fourth Plain corridor and to the north and south of the Mill Plain corridor (Design Workshop, 2024). See Exhibit 39.

Exhibit 40: Building Use Land Map, 2024



Source: (Design Workshop, 2024)

Centers and corridors that have a high-level of essential service provision include Fourth Plain, Vancouver City Center, Central Park and Columbia Tech Center. Areas that are otherwise identified as areas for concentrated growth on the City's 2011 Comprehensive Plan and are still in progress include 112th Avenue Corridor, Fruit Valley, Evergreen and Grand Commercial Corridors, the Heights District, Riverview Gateway, Lower Grand Employment Area, and Section 30.

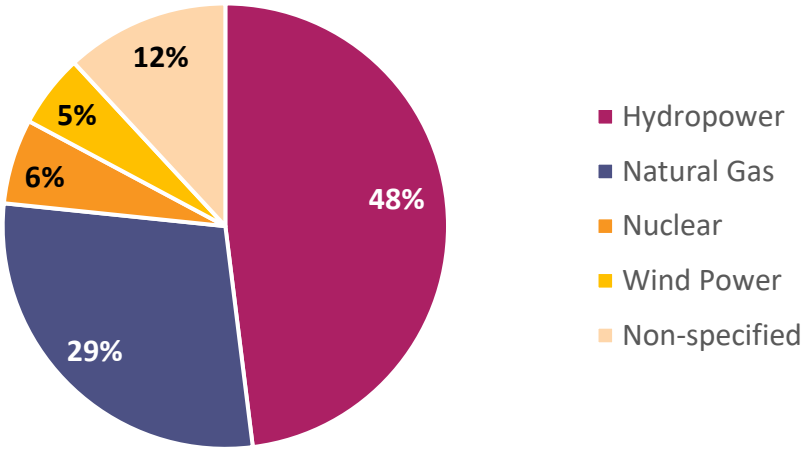
Energy

Energy sources for Vancouver are hydropower, natural gas, nuclear, and some renewable energy. Bonneville Power Administration and Clark Public Utilities serve the city. Clark Public Utilities specifically sources energy from the following:

- 48.03% is hydropower purchased from the Bonneville Power Administration (BPA).
- 28.61% is natural gas produced at Clark Public Utilities River Road natural gas-fired generating plant. This facility is located in Vancouver.
- 6.17% is produced by nuclear electricity (BPA purchases the output of the Columbia Generating Station located in Richland, Washington).
- 5.30% is wind power generated at the Combine Hills II wind farm near Milton Freewater, OR.
- 11.89% is market-purchased power from non-specified sources.

As of January 2020, Clark Public Utilities reported facilitating 1,489 individual privately-owned generating systems, primarily rooftop solar, totaling 10.414 megawatts of installed distributed generation capacity (Clark Public Utilities, 2020). Clark Public Utilities also have constructed two Community Solar projects that offer "virtual net metering" for participants benefiting from the two large solar arrays constructed (Clark Public Utilities, 2024). These projects include a total of 1,118 kilowatts of solar capacity. The projects are both fully utilized, and 199 kilowatts were reserved for low-income customers. See Exhibit 40.

Exhibit 41: Clark County Energy Sources, 2022.



Source: Clark Public Utilities Integrated Resource Plan, 2022; BERK, 2024.
Vancouver's nearly 30 electrical substations are distributed evenly across the City (Clark County, 2024).

In 2023, the buildings and energy sector made up 37% of Vancouver community-wide emissions, second to transport and travel. Out of that 37%, 15% was residential energy, 13% was commercial energy, and 9% was industrial energy (City of Vancouver, 2024). This was an increase in energy use for the community from 2019. However, GHG emissions decreased, likely due to the increased clean energy within the Clark Public Utilities resource mix. The buildings and facilities sector made up 23% of Vancouver government operations emissions, a 9% decrease from 2019. (City of Vancouver, 2024).

Potential Impacts

Vancouver's buildings and energy are expected to be mainly impacted by extreme heat, wildfires, and wildfire smoke. The potential impacts could involve increased energy demands, urban heat island effects, extreme heat exposure health risks, shuttered energy systems, and damage or loss of both energy infrastructure and buildings.

- Energy demand is expected to increase for air conditioning and industrial cooling systems in summer when regional hydropower supply is expected to decrease.
- Demand for air conditioning and infrastructure with cooling systems is expected to increase where it does not exist. Older buildings are less equipped with air conditioning systems or are less efficient, and the residents of these buildings will be more at risk to extreme heat. Lower income communities of color tend to live in these older buildings. The cost of using cooling systems during peak demand could also not be affordable for lower income households (Duque, 2023).

- Power cables have been known melt during extreme heat, such as during a heat wave in 2021 in Portland, OR (Fischels, 2021).
- There may be shuttered power generating stations or transmission corridors to reduce wildfire risk.
- Greater potential to affect energy transmission by extreme weather damaging infrastructure and interrupting transmission and distribution. The Natural Hazards Management Plan identifies extreme weather as a risk.
- Expected building and infrastructure damage and loss.
- Poor air quality due to wildfire smoke could increase demand for air filtration systems in buildings. A recent example took place in August 2023, when the Air Quality Index measured at "unhealthy" ranges in Vancouver (Ellenbecker, 2023).

Exposure of buildings to increases in extreme heat, urban heat island impacts, and energy demand for cooling system can depend on tree canopy level. Vancouver has a current tree canopy cover of 19% with a goal of reaching 28% by 2030 (City of Vancouver, 2024). However, tree canopy coverage is higher in the east and west areas of Vancouver, than central Vancouver. Central Vancouver therefore has a higher risk of potential impacts. These central neighborhoods are prioritized for tree canopy improvements (City of Vancouver, 2024).

Adaptive Capacity

Clark Public Utilities offers many rebates and programs to incentivize energy efficiency. They offer rebates for the installation of heat pumps and ductless heat pumps. They also offer a home weatherization program, a heat pump water heater program, a solar energy program, multi-family property programs, new construction programs, electric vehicle programs, and an electric vehicle managed charging program.

The City of Vancouver's initial efforts in this sector have focused on transitioning to renewable energy, reducing government building emissions, reducing community-wide energy consumption, and decarbonization. In September 2023, the City purchased a 10-kW share (the maximum amount allowed) of Clark's PUD's Community Solar East project. In October 2023, the City also started to identify energy efficiency improvement projects and opportunities to swap gas-powered systems for lower-emission electric systems in City facilities. City facilities were also being reviewed for compliance with WA Clean Building Standards.

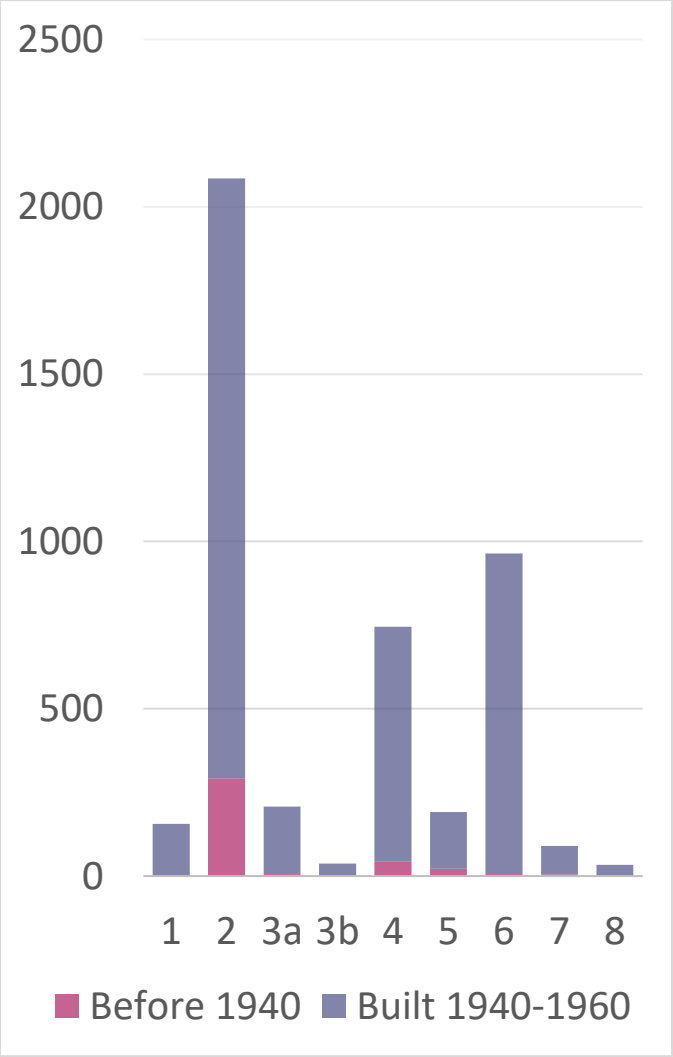
The City of Vancouver is in the process of developing Vancouver's first Green Building Policy. The policy and associated building code updates were discussed with the City Council at the end of 2024. Work is expected to continue to 2026 to account for voter initiatives in 2024.

Vulnerability Summary

Most structures in Vancouver are residential, which are sensitive uses for air quality and heat. Based on age of housing stock, Areas 2 and 6 have older buildings built before 1960, which are less likely to have cooling or air filtration, and these areas have higher or medium-high levels of exposure to heat or smoke. Area 4 has the third highest number of older homes, and a medium-high exposure to heat. See Exhibit 41 and heat and smoke/air quality maps in Chapter 2. Other areas have more homes built later which may have cooling systems but may not have air filtration systems.

These findings align with the Adaptive Capacity Assessment, which also emphasizes the importance of modern HVAC systems, backup power, and clean air shelters—especially in socially vulnerable neighborhoods—to ensure residential resilience under worsening climate conditions.

Exhibit 42: Vulnerability by Area: Residential Structures Built before 1960



Sources: Clark County Housing Assessor Data, 2024; BERK, 2025.

The probability of extreme heat and smoke in the planning period, and the need to retrofit older homes are drivers of vulnerability and risk. See Exhibit 42.

Exhibit 43: Risk Summary – Building Sector

Likely Climate Impacts in next 10+ years				Magnitude of Loss			City Responsibility			Vulnerable Communities			Areas Most Affected							
Heat	*Fire*	*Precip*	*Drought*	*Less*	*More*	*Most*	*Less*	*More*	*Most*	*Less*	*More*	*Most*	1	2	3A	3B	4	5	6	7	8

Source: BERK, 2025.

Gaps and Opportunities

Strategies to Improve Adaptive Capacity

Climate adaptation and engagement results highlighted a number of strategies to improve the community's adaptive capacity associated with buildings and energy, both public and private:

- Increase the adaptability of public buildings. (Hatch Planning and City of Vancouver, 2022)
- Update building and development codes to increase adaptability of non-public buildings. (Hatch Planning and City of Vancouver, 2022)
- Promote renewable energy within the built environment. (Hatch Planning and City of Vancouver, 2022)
- Implement an uninterruptible power supply and backup generator for critical facilities (e.g. wastewater treatment plant). (City of Vancouver, 2025)
- Pilot hybrid energy systems and microgrid readiness at critical facilities to ensure service continuity. (City of Vancouver, 2025)

Policies

The current Comprehensive Plan, last updated in 2011, has limited policies on energy, focused on conservation. Amendments could be made to catch the Comprehensive Plan up to the extensive work the City has done regarding climate action and energy.

Vancouver plans to transition to 100% clean energy with Clark Public Utilities ahead of the state's Clean Energy Transformation Act (CETA) requirements, and before 2045. There are opportunities for Vancouver to develop concrete policies to work with businesses, property owners, and nongovernmental partners and prevent displacement of low-income residents and ensure the costs and benefits of energy efficiency upgrades are shared equitably. This is promoted in the Climate Action Framework Action #1: Community energy efficiency incentives.

The Vancouver Urban Forestry Management Plan offers opportunities to bolster green infrastructure, reducing the urban heat island effect, and increasing the resiliency of structures. See Ecosystems and Zoning & Development for more discussion.

The City could also lead with the Green Building Policy that is currently being developed and adopt it for all municipal buildings. The Climate Action Framework actions 7 and 8 address green building policies for public and private development.

The Climate Adaptation Strategy also recommends energy efficiency measures such as retrofitting buildings with passive and active cooling, promoting renewable energy

production and storage projects in the case of power outages, and researching built environment climate resilient materials. Many of these considerations are part of the Climate Action Framework. The City could model by retrofitting older city-owned buildings with cooling systems. The City or Clark Public Utilities could also implement programs and incentives for renewable energy production and storage projects, and fund or partner with organizations researching climate-resilient alternative materials.

The Vancouver Climate Action Framework also highlights key actions that would improve climate adaptability, such as promoting solar incentives and to reduce dependency on the energy grid and enhance resilience during disruptions, increasing energy efficiency through electrification and retrofits to reduce overall energy demand.

Battery energy storage systems (BESS) are used to store renewable energy from solar or wind power to ensure more reliability and match it to customer demands. BESS can be of any size and are modular and may only require "a concrete pad to sit on and a connection to the electric grid." As a result, the BESS can be built anywhere including near existing commercial and residential uses and present concerns regarding safety, aesthetics, noise, odor, and environment impacts. Cities and counties are beginning to address such uses in zoning codes. Vancouver may wish to develop a policy and development regulations addressing these uses as well. (Twitchell, 2023)

Policies developed for **OUR VANCOUVER 2045** address energy resilience and reduction of greenhouse gas emissions, such as:

- Ensure that buildings contribute to the City's greenhouse gas reduction goals, protect occupants from climate hazards and extreme weather, and minimize harm to wildlife and natural ecosystems. (Policy 48)
- Expand residential, commercial and industrial access to solar power to meet energy needs. (Policy 134)
- Encourage new renewable energy infrastructure and promote development of storage systems to ensure a stable, resilient, and sustainable energy grid. (Policy 150)
- Support decentralized local energy and water solutions while strengthening community adaptability to environmental, social, and economic changes. (Policy 145)

Cultural Resources & Practices

Sector Overview and Assets

Originally inhabited by peoples of the Chinook and Cowlitz tribes for thousands of years, Vancouver was established as a trading post for the British Hudson's Bay Company and military fort in the 1800s. (Design Workshop, 2024) See Exhibit 43. A non-native community was founded in 1825 and the city incorporated in 1857. From an 1890 census population of 3,545 (OFM) Vancouver is home to 202,600 persons as of 2024.

Exhibit 44: Fort Vancouver Garden – In use historically and today

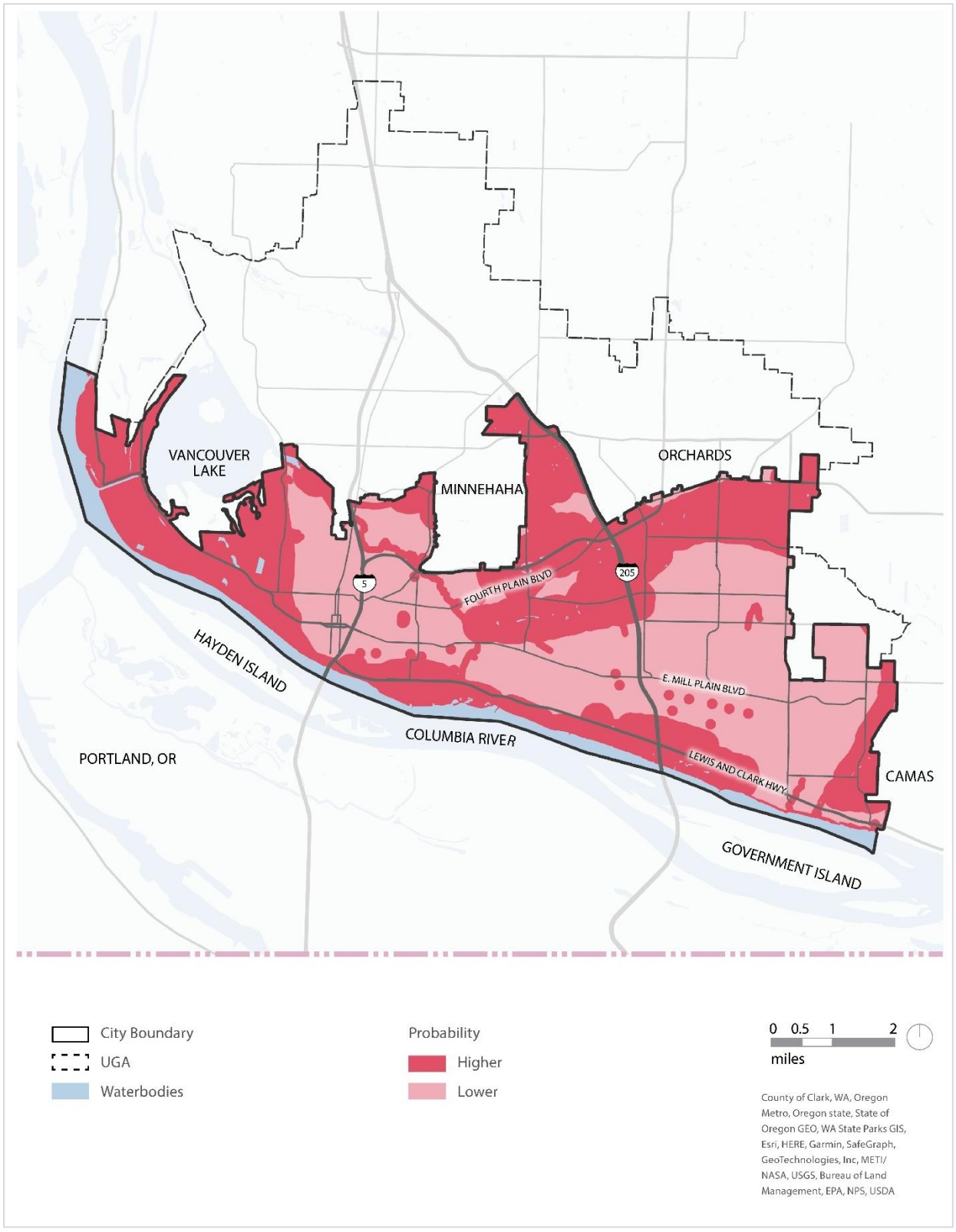


Historically, the Fort Vancouver Garden was a place of rest for the fort's officers and visitors, and provided food for the Chief Factor's House table. Today's reconstruction at Fort Vancouver National Historic Site is tended by volunteer gardeners.

Source: (National Park Service, 2022)

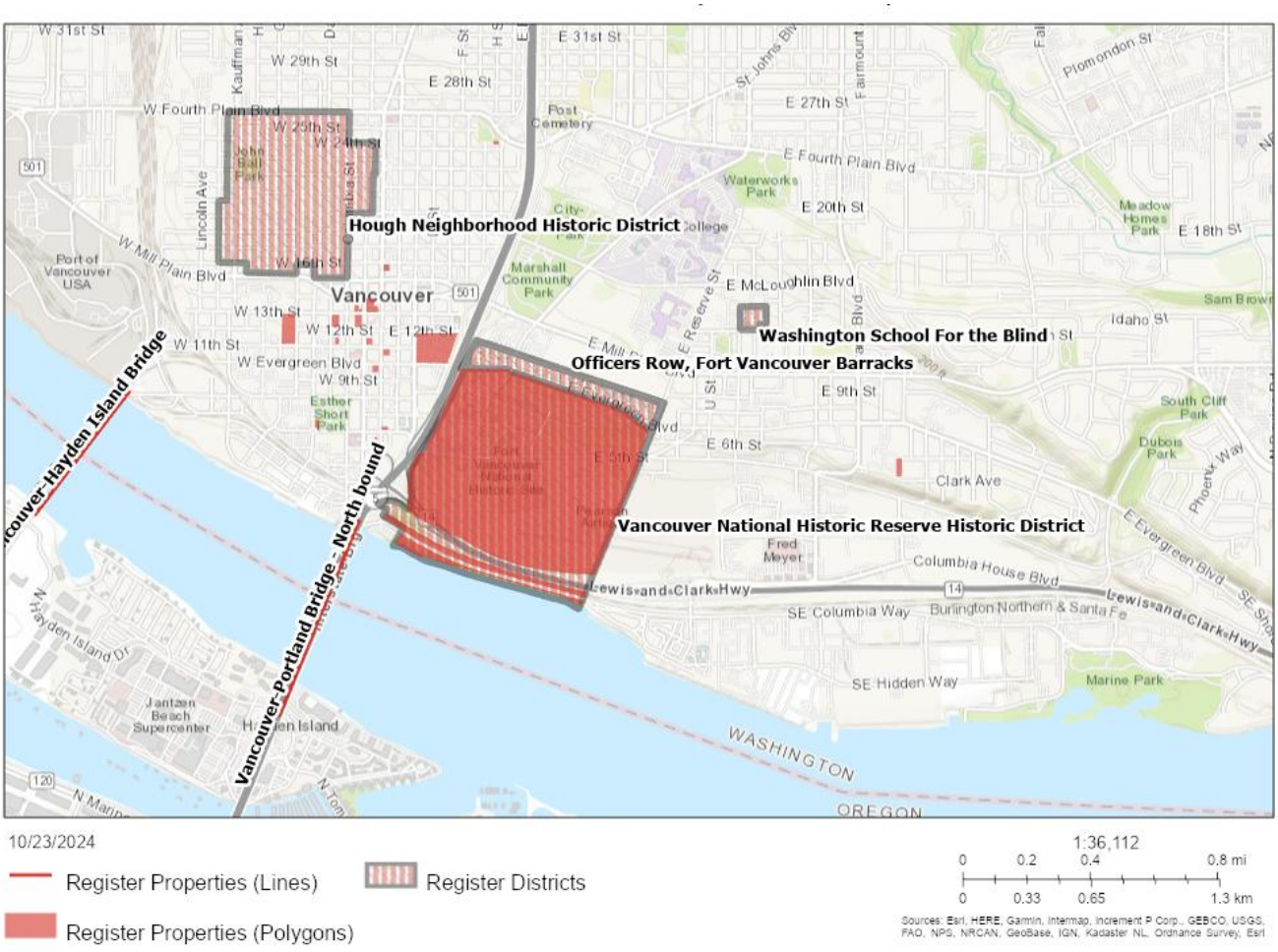
The original historic and walkable downtown is connected to residential areas by an arterial system and is more suburban in character as it expanded to the east. Maps of archaeological resources and historic resources are shared in Exhibit 44 and Exhibit 45. There is a higher probability of archaeological resources along the Columbia River, Vancouver Lake, and Burnt Bridge Creek.

Exhibit 45: Archaeological Probability Map



Source: (Design Workshop, 2024)

Exhibit 46: Historic Resources Map



Source: DAHP, 2024.

Potential Impacts

Vancouver's Hazard Mitigation Plan identified concerns with extreme weather and urban flooding, but less so flooding in the 100-year floodplain. However, Clark County notes flood stage measured at the Port of Vancouver is at 16 feet, and there have been 25 historic crests, most recently in 2011 and 2017. Extreme heat is a likely occurrence in the **VANCOUVER 2045** planning period.

Climate change could impact archaeological, historic, and other cultural resources.

- Loss of cultural sites due to more frequent and intense severe weather events. The location of cultural archaeological sites along rivers and streams and the expected increase in extreme precipitation and flooding could put assets at risk. Adapting

cultural resources to climate change impacts can be challenging because many are unique, irreplaceable, and location based.

- Due to their historic nature and the associated limitations on structural adaptation some historic structures have very constrained adaptative capacity. However, while there are some historic sites along water bodies like the Columbia River, most historic properties such as in downtown are at low risk of flooding due to building locations and existing flood control structures. An exception could be the Vancouver National Historic Reserve Historic District that fronts the river in part. The site also contains priority habitats.
- Loss of locally grown, temperature-sensitive foods that are culturally important (berries, salmon, etc.). Hot dry summers are projected to reduce stream flow volumes and increase instream temperatures. This stressor is compounded by extreme precipitation events, flooding, and erosion. Watershed plans and evaluations for the City's critical areas ordinance highlight declining water quality and fish habitat and a need to improve riparian areas along streams and shorelines.

Adaptive Capacity

Priority habitats like prairies and Oregon white oaks are found in some parts of the city such as the Fort Vancouver National Historic Site and along stream corridors and greenways. (Sound Oaks Initiative, 2024) Remnant wetlands, riparian and non-riparian habitat areas continue to be found along streams and lakes, parks, and transportation rights of way. (WSP USA, 2023) These habitats can support, or be restored or enhanced to support, plants and fish species important for tribal customs, medicines, and foods.

The Cowlitz Indian Tribe members have indicated an interest in Food Sovereignty. (Cowlitz Indian Tribe, 2022) Protecting and restoring habitats and adapting to climate stressors can help sustain culturally important habitats, foods, and practices.

The City is supporting updated riparian buffers based on site potential tree height which could improve shading, stream temperature, and other functions of buffers. In addition, the City has an Urban Forestry Management Plan that is meant to improve management of existing canopy and expand it inside and outside of critical areas.

Vulnerability Summary

A summary of vulnerability for cultural resources is provided in Exhibit 46 below. Habitat is found along lakes and streams throughout the city. Extreme heat, drought, and flooding are anticipated to affect culturally important plants and wildlife and require adaptation measures (enhancement, restoration) along streams, lakes, and other sites. Throughout but

particularly areas 1, 2, and 5, archaeological and historic sites could require adaptation (flood management measures, retrofits for energy and air filtration).

Exhibit 47: Vulnerability by Census Tracts – Cultural Resources

Census Block	Area	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index	River, Lake, or Creek	Register Properties
53011041005	1	Medium-high	Higher	Lower	Higher	Higher	Higher	X	X
53011042400	2	Higher	Higher	Medium	Higher	Higher	Higher	X	X
53011041105	3b	Medium-high	Higher	Medium-low	Higher	Medium-low	Medium	X	
53011041600	4	Medium-high	Higher	Medium	Higher	Higher	Higher	X	
53011042700	4	Medium-high	Higher	Medium	Higher	Higher	Higher	X	
53011042601	5	Medium-high	Higher	Medium-high	Higher	Medium	Medium	X	X
53011041205	6	Medium-high	Higher	Medium-high	Higher	Medium-high	Higher	X	
53011041312	7	Higher	Higher	Medium-low	Higher	Medium-high	Higher	X	

Source: See Chapter 2 for indicators and methods. BERK, 2025.

Based on the evaluation, cultural resources risks and vulnerabilities are noted below.

Exhibit 48: Risk Summary – Cultural Resources



Source: BERK, 2025.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

As part of social vulnerability and asset mapping efforts, engaged community members about their important places. Strategies identified through climate engagement includes:

- Food: Expand culturally relevant gardens as a way to increase food access and resilience. (City of Vancouver, 2025)

The City could similarly engage Tribes about ecosystems, habitats, and foods/plants that should be considered when planning for climate resilience. Direct engagement can help ensure that culturally significant landscapes, species, and materials are not overlooked in technical assessments of risk and adaptation.

One parks and habitat strategy relevant to Tribes identified through the Adaptive Capacity Assessment includes:

- Park Resilience: Incorporate traditional ecological knowledge if working with local Indigenous groups for habitat restoration in parks to handle climate changes. (City of Vancouver, 2025)

Additional strategies can be elicited through consultation and collaboration with Tribes.

Policies

Vancouver's cultural resources policies are primarily found in the Shoreline Master Program,. Current policies address general protection of archaeological and historic resources. Some address engagement with tribes in restoration of habitat.

The City could add policies covering cultural resources adaptation to extreme heat and flooding and Tribal consultation, similar to examples in the Washington Department of Commerce's Climate Policy Explorer. Accordingly, the **OUR VANCOUVER 2045** plan includes the following:

- Foster meaningful partnerships with tribal communities and land stewards, integrating their knowledge, priorities, and cultural perspectives into local decision-making processes. (Policy 49)
- Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, protection and rehabilitation of historic and architecturally significant structures and heritage trees. (Policy 66)

Economic Development

Sector Overview and Assets

Vancouver has approximately 99,057 jobs as of 2021. (US Census Bureau, 2021) There are approximately 7,840 businesses in Vancouver. In certain neighborhoods, including Fourth Plain, at least one-third of businesses are minority owned or cater to communities of color. (Design Workshop, 2024)

Approximately 27% of all parcels in the City are zoned for commercial uses. Another 17% of all parcels in the City are zoned for industrial uses. (Design Workshop, 2024) The City is planning for growth of at least 38,000 new housing units and 43,100 new jobs by 2045.

Potential Impacts

Job Sectors in Vancouver

While flooding, wildfire, and drought are relatively lower risk in Vancouver (Clark Regional Emergency Services Agency, 2023), severe weather including extreme heat and extreme precipitation could impact businesses and employees. Wildfire smoke in the region could also affect businesses and employees for those who work outdoors.

Exhibit 49: Clark County, Washington, Top Employers

	Company	Clark County Employees
1	Peace Health	4,908
2	Vancouver Public Schools	3,300
3	Evergreen Public Schools	2,599
4	Vancouver Clinic	2,305
5	Legacy Health	1,800
6	Clark County	1,570
7	Ilani	1,500
8	City of Vancouver	1,480
9	Clark College	1,417
10	Zoom Info	1,374
11	Bonneville Power Administration	1,367
12	Battle Ground School District	1,313
13	HP	1,000
14	Kaiser Permanente	1,000
15	SEH America	950

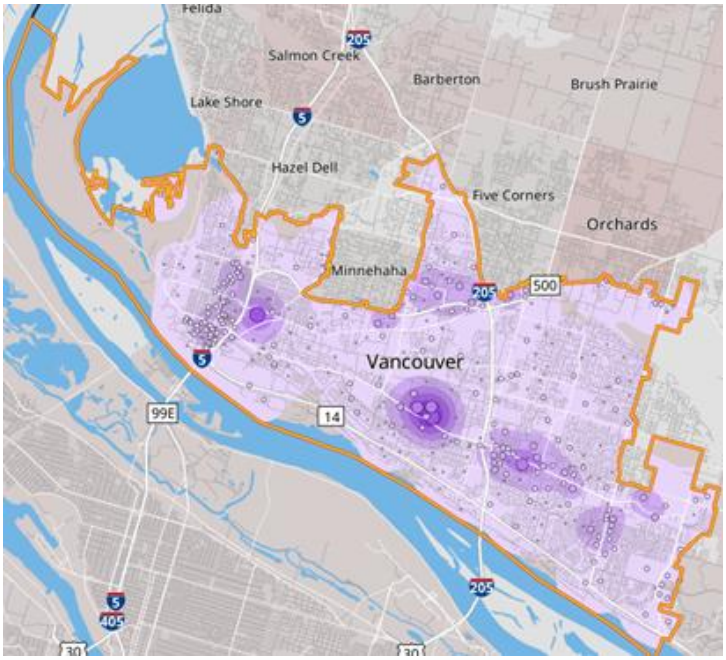
Source: CREDC Research (Accessed September 2024)

Health care (19%), retail and wholesale trade (15.3%), and manufacturing/transportation/utilities (12.2%) are notable sectors in Vancouver's local economy. (US Census Bureau, 2021) Top employers in the county are often based in Vancouver including health care – Peace Health, Vancouver Clinic, Legacy Health, Kaiser Permanente – and education or government – Vancouver Public Schools, Evergreen Public Schools, as well as the City and County employees. See Exhibit 48.

Sectors under stress during extreme climate related hazards include health care (e.g., adverse health with extreme heat or wildfire smoke) or utilities (BPA, Clark Public Utilities) with potential power demand spikes (extreme heat) or outages (extreme storms). Exposure

of health care facilities to poor air quality or power disruption could reduce continuity of operations during critical events. Healthcare employment density is highlighted in Exhibit 49.

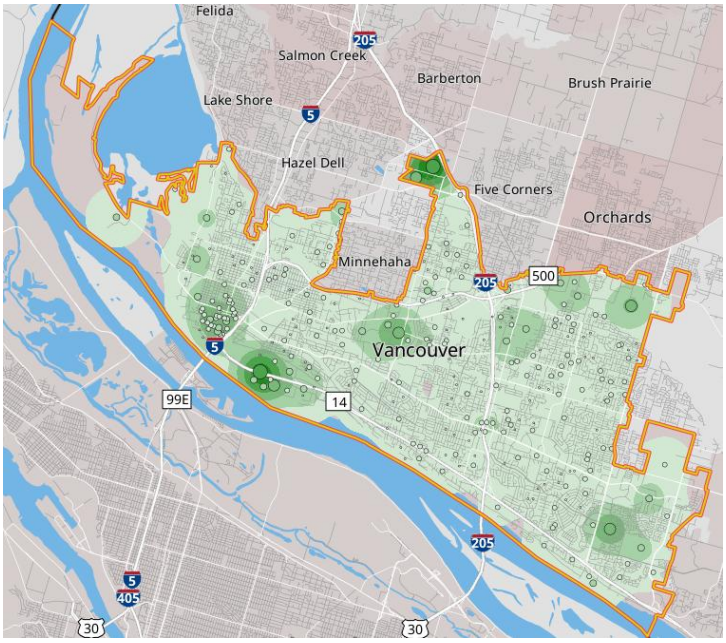
Exhibit 50: Location of Health Care Employment, 2022



Source: Census on the Map, 2022

About 6.2% of Vancouver's jobs relate to construction, likely outdoors and potentially exposed to extreme heat and wildfire smoke. (US Census Bureau, 2021) The concentration of construction jobs is illustrated in Exhibit 50 below. These workers face increased health and productivity risks during climate extremes, particularly in areas lacking tree canopy or shade infrastructure.

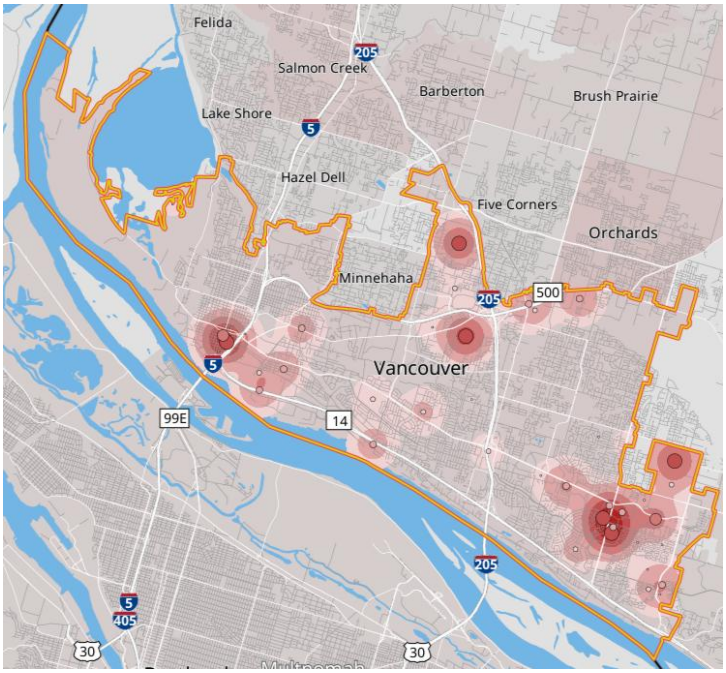
Exhibit 51: Location of Construction Jobs, 2022



Source: Census on the Map, 2022

Arts and entertainment venues that are outdoor, such as Esther Short Park and the Farmers Market or Vancouver Volcanos Home Games, could be more vulnerable and lose revenue during heat or smoke events and indoor facilities such as museums and performing arts or movie theaters with cooling and filtration such as could see greater demand for services. Investment in HVAC upgrades and air filtration systems in indoor venues could support both public health and local economic resilience. Concentrations of arts and entertainment jobs are shown in Exhibit 51.

Exhibit 52: Arts & Entertainment Jobs, 2022



Source: Census on the Map, 2022

Commuters

Almost two-thirds of residents work outside of Vancouver though most work within 10 miles of home. See Exhibit 52 and Exhibit 53. Employers and commuters in and out of Vancouver could be impacted by climate related events such as extreme precipitation and flooding affecting roads or extreme heat affecting transit.

> *In Washington, the heat caused sections of Interstate-5 and State Route 162 to buckle, causing some lanes to be closed. In Portland, the heat exceeded the design limits of the TriMet MAX system, melting train power lines and shutting down trains for a day. (USDA Northwest Climate Hub, 2024)*

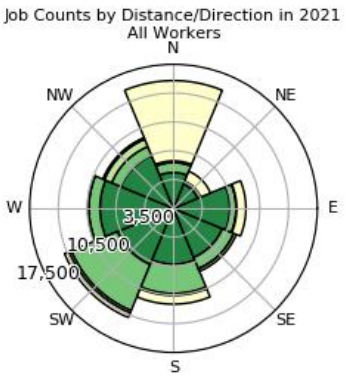
Exhibit 53: Commute Flow

	Count	Share
Living in the Selection Area (Vancouver)	83,157	100.0%
Living and Employed in the Selection Area (Vancouver)	28,447	34.2%
Living in the Selection Area (Vancouver) but Employed Outside	54,710	65.8%

Source: (US Census Bureau, 2021)

Exhibit 54: Home to Work Distance/Direction (2021)

	Count	Share
Total All Jobs	83,157	100.0%
Less than 10 miles	50,945	61.3%
10 to 24 miles	15,942	19.2%
25 to 50 miles	1,860	2.2%
Greater than 50 miles	14,410	17.3%



Source: (US Census Bureau, 2021)

Adaptive Capacity

Vancouver has an Emergency Operations Plan that considers severe weather, forest/wildland fire, flooding, and energy shortages. (City of Vancouver, 2018) The City also coordinates with Clark County and cities through the Clark Regional Emergency Services Agency (CRESA) on emergency planning, such as the 2023 *Natural Hazard Mitigation Plan*. (Clark Regional Emergency Services Agency, 2023)

During severe weather such as extreme heat, Vancouver advertises places to cool off including Community Centers and Libraries serving in effect as cooling centers and quasi-resilience hubs. (City of Vancouver, 2024) Regarding transit access, during extreme heat, C-TRAN will take anyone riding to a cooling center.

A regional initiative is defining emergency transportation routes and updating a 2006 plan between Clackamas, Columbia, Multnomah and Washington counties in Oregon and Clark County in Washington. The effort is addressing wildfires, landslides, floods, extreme weather events, and impacts of climate change as well as earthquakes and volcanic eruptions. In addition to state routes, a number of arterials in the city limits and port vicinity are defined as regional emergency transportation routes. Some are at risk of floods and other hazards. Ensuring access along these routes during emergencies is critical for maintaining economic function, particularly for industrial areas and essential service workers. A current phase (2024-2026) is prioritizing an updated network. (RDPO, 2024)

Vulnerability Summary

Based on the locations of workers and venues described in Job Sectors in Vancouver above and Climate Exposure, Equity, and Health in Chapter 2, the areas with greatest exposure are shared in Exhibit 54.

Exhibit 55: Vulnerability by Area – Economic Development

Area	Outdoor Workers	Health Care	Arts & Entertainment
Type of Impact	Exposure & Risk of Lost Business or Wages	Increased Demand	Exposure & Risk of Lost Business or Increased Demand
1			
2		X	X
3A			
3B	X		X
4			X
5		X	X
6		X	
7	X		
8	X		X

Source: BERK, 2025.

Outdoor workers, health care providers serving those with health sensitivities, and outdoor recreation and events workers would be vulnerable to extreme heat and smoke events that are more probable in the planning period and more widespread in their effect. Flooding from extreme precipitation could be more focused in its location but impact many commuters. In neighborhoods with higher social and health vulnerability, these disruptions may be compounded by limited access to protective infrastructure or recovery support. The potential magnitude of loss to the economy from one or more events could be more than moderate and require City investment in recovery. See Exhibit 55.

Exhibit 56: Risk Summary – Economic Development

Likely Climate Impacts in next 10+ years	Magnitude of Loss	City Responsibility	Vulnerable Communities	Areas Most Affected
				1 2 3A 3B 4 5 6 7 8

Source: BERK, 2025.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

Resilience Rising results identified some adaptive strategies especially related to emergency hubs and information:

- Potential of existing neighborhood institutions—including gyms or grocery stores—to serve as hubs during emergencies. (City of Vancouver, 2025)
- Leveraging local businesses to help spread emergency information. (City of Vancouver, 2025)

The Adaptive Capacity Assessment identified examples of collaborative programs including with businesses, noting that in some cities, local businesses have sponsored bus shelters with cooling features, in exchange for modest advertising. (City of Vancouver, 2025)

The City could also continue to work through regional bodies to understand commute patterns and risks as well as learn about concerns from residents commuting across lifeline networks. Additional engagement could focus on minority- and immigrant-owned businesses, who may face barriers to accessing recovery resources following climate disruptions.

Policies

A policy evaluation, available under separate cover, identified topics that could be integrated into the updated plan to further address economic development such as:

- Address green technology/jobs opportunities.
- Bring in strategies from Climate Action Framework such as building a more community-driven, circular economy.
- Promote business continuity planning in climate-sensitive sectors such as construction, transportation, healthcare, and logistics.
- Prioritize infrastructure upgrades in areas where economic activity overlaps with high exposure and vulnerability.

Example policy concepts in the Our Vancouver 2045 plan include:

- Build a resilient economy: Encourage business growth, retention, and expansion, with an emphasis on family-wage jobs and foster resilience within Vancouver's economy. (Policy 24)

See also Emergency Management.

Emergency Management

Climate change presents a threat to the City's emergency response due to increased frequency and severity of extreme weather events. The City has updated its emergency management plan to reflect the hazards posed by climate change, but this increase could strain capacity and challenge current approaches to mitigation, preparedness, response, and recovery.

Local resources reviewed for this section include the following:

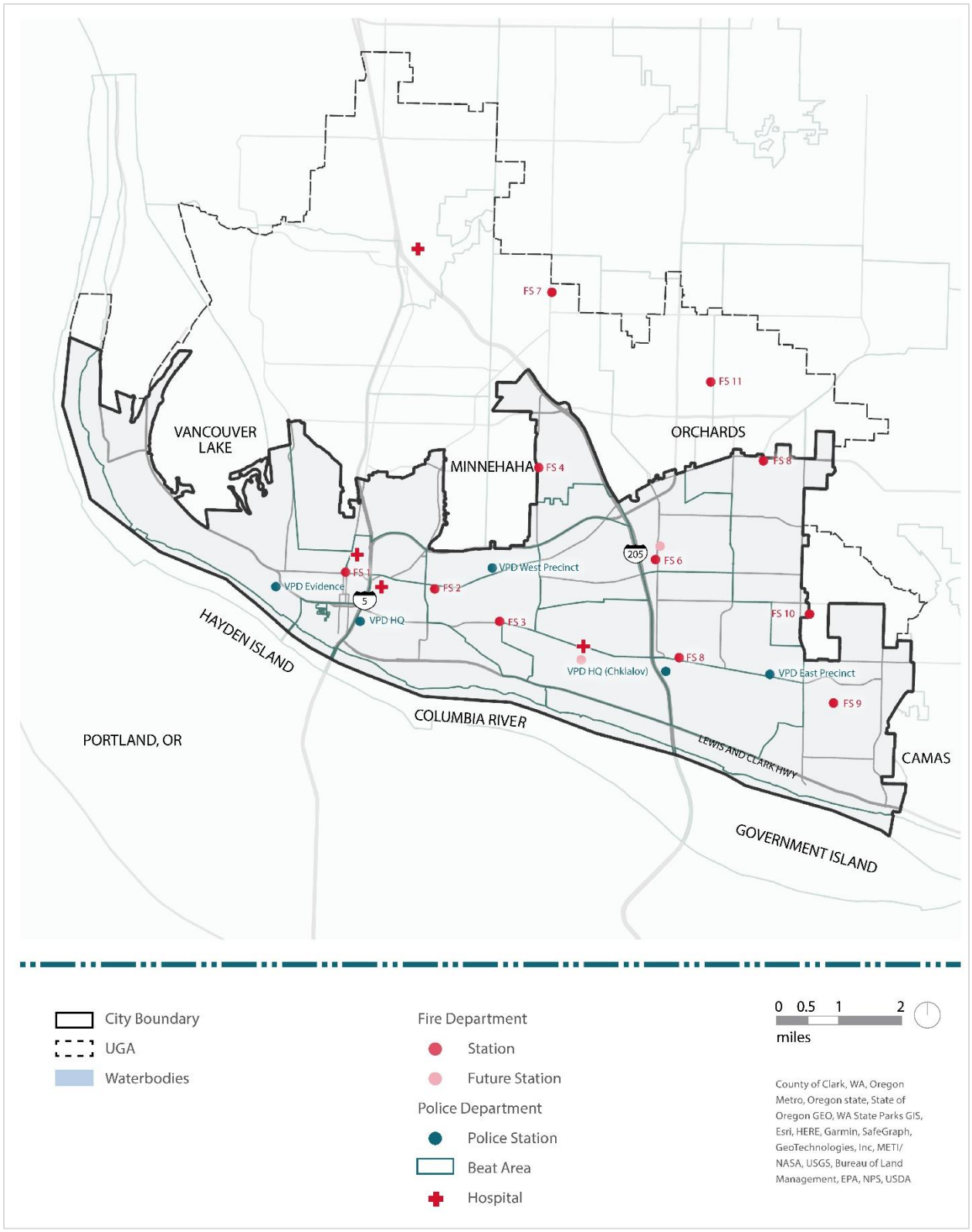
- Chapter 2.12 VMC, Emergency Management
- City of Vancouver Emergency Operations Plan, 2018
- City of Vancouver Climate Adaptation Strategy, 2022
- Clark Regional Emergency Services Agency (CRESA), 2023 Clark County Natural Hazard Mitigation Plan, Volume 2 Planning Partner Annexes, March 31, 2024
- State of Washington Comprehensive Emergency Management Plan and Program – Updated, 2019
- Vancouver Police Department Policy Manual Policy 206

Sector Overview and Assets

Vancouver's emergency management priorities are to eliminate major threats to life and safety, stabilize the incident situation, provide basic human needs, maintain/restore essential services, and protect critical infrastructure and the environment. (City of Vancouver, 2018) Many departments respond to and work to mitigate potential hazards and emergencies through planning, regulation, and capital improvements. The departments that manage day-to-day emergency response are Fire, Police, and EMS, while larger emergencies can require disseminating information, coordinating resources, and activation of an interdepartmental Emergency Operations Center (EOC) as well as the Clark Regional Emergency Services Agency (CRESA) that provides 911 dispatch, technology services and emergency management. Recovery involves damage assessment, conducting repairs to capital facilities, and aiding impacted people and organizations.

Emergency facilities in Vancouver include about eight fire stations, two police precincts, three major hospitals, three community centers, and several mobile EMS units provided through a contract with American Medical Response. Hospitals are located predominantly in the western and central parts of the city. See Exhibit 56. Additional emergency facilities are evenly distributed throughout the city to meet the needs of residents. Emergency facilities are unevenly distributed with greater concentrations of hospitals and EMS resources in the central and western parts of Vancouver. In contrast, eastern neighborhoods may face slower response times, particularly if transportation networks are disrupted by heat or flooding.

Exhibit 57: Emergency Services Locations in Vancouver



Source: (Design Workshop, 2024)

Potential Impacts

Vancouver's emergency management system would likely be affected by heat and wildfire smoke events. Extreme heat events would lead to acute heat related illness and hospitalizations and put severe strain on emergency medical service personnel within the Vancouver Fire Department and the paramedics from American Medical Response (AMR). (City of Vancouver, 2018) (Hayden, 2023) Areas of the city with more tree canopy cover are likely to experience lower, safer temperatures during extreme heat events and reduce damage to roadways. Vancouver has a current tree canopy cover of 19% with a goal of reaching 28% by 2030 (TreeCAP, 2024). However, canopy cover varies greatly across the city. See Zoning & Development for more information.

Wildfire smoke can lead to both chronic and acute pulmonary health impacts that can also strain emergency management resources (Ecology W. S., 2023). In the event of both extreme heat events and wildfire smoke events, community spaces may be strained for capacity as they serve as either explicit or de facto clean air and cooling shelters. According to regional assessments, many existing facilities do not meet the ventilation or filtration standards necessary for sustained clean air shelter function. (City of Vancouver, 2025) Groups especially vulnerable to both of these hazards are older adults, individuals experiencing homelessness, undocumented immigrants, low-income individuals, and individuals with limited English proficiency as these group may be socially isolated and therefore less likely to seek emergency services or community shelter (City of Vancouver, 2022). Based on demographic analysis of the city, these vulnerable populations are more prevalent in the west and central portions of the city and less so in the east area of the city; see Exhibit 20. The potential health impacts of these specific climate hazards are also detailed in the Health & Well-being section of this document.

Additionally, extreme precipitation, roadside brush fires, and extreme heat may impact the transportation infrastructure that is necessary for emergency response for all departments. The 2025 Adaptive Capacity Assessment suggests the fire department collaborate with transportation departments to identify and fortify the critical routes used by fire engines and ambulances. (City of Vancouver, 2025) Extreme heat events can lead to cracking and buckling of roads or damage to transit infrastructure (Fischels, 2021). Roadside brush fires can damage roads and make them temporarily impassable until the fire is adequately suppressed especially in the west and the northeast/east portions of the city which have been identified as part of the Wildland Urban Interface (WUI, 2024). Emergency vehicle access in these areas may also be impaired by narrow roadways or lack of redundancy in evacuation routes.

The Vancouver Fire Department serves residential, commercial, and industrial uses, and protects 22 miles of shoreline. (City of Vancouver, 2025) Urban flooding may simultaneously increase demand for emergency services to manage impacts including but not limited to hazardous materials contamination and potential structural collapse while also makes it very challenging to reach individuals facing these emergencies due to roadway flooding (FEMA, 2021). Even moderate localized flooding can trigger cascading service impacts, including delays to emergency response, reduced access to healthcare, and temporary power outages that affect communication and traffic control systems.

While flood events have been experienced in Vancouver, the risk is considered low, except for urban flooding with extreme weather. (Clark Regional Emergency Services Agency, 2023) In the event of urban flooding from extreme precipitation, the same vulnerable populations mentioned in the previous section may be unable to effectively navigate the city and reach medical care or social services. Examples of urban flooding have been identified in climate planning efforts including:

- On the Fourth Plain BRT line, which runs through some older, low-lying neighborhoods, chronic street flooding has already been noted at certain intersections – these incidents are likely to worsen with climate change. (City of Vancouver, 2025)
- Fruit Valley residents described frequent flooding and clogged storm drains. (City of Vancouver, 2025)

Both the Transportation and Health & Well-being sections of this document also address these concerns.

Adaptive Capacity

Aspects of the emergency management system with adaptive capacity include:

- The City of Vancouver in coordination with Clark Regional Emergency Services Agency (CRESA) has identified and advertised several cooling shelters such as Vancouver community library, Vancouver Mall Library, Firstenburg Community Center, Marshall/Luepke Community Center, Water Resources Education Center and provides no cost C-TRAN bus service to and from cooling centers in the event of extreme heat. (City of Vancouver, 2024)
- The City is also able to open temporary cooling centers during extreme events, in collaboration with area churches and other organizations. Additional coordination with culturally specific organizations could increase participation from immigrant and refugee communities that face heightened barriers to accessing city resources.

- CRESA, in coordination with the City of Vancouver, provides recommendations for actions to take during smoke events but does not have specific facilities or strategies to combat poor air quality caused by wildfires.
- Facilities necessary for citywide emergency response are typically equipped with emergency generators to ensure continuity of services during power disruptions. However, greater frequency of power outages due to increased energy use during heat events could lead to increased cost and dependency on these generators during emergencies. Backup power remains uneven across critical facilities. Clean energy resilience strategies—such as solar+storage—may offer co-benefits in energy savings and emissions reduction.
- The Vancouver emergency operations plan identifies localized flooding from extreme precipitation as a "Major Emergency" and specifies effective response to all major emergencies including this specific hazard. (City of Vancouver, 2018) (Clark Regional Emergency Services Agency, 2023) The 2025 Adaptive Capacity Assessment has recommended that Vancouver's ongoing regional planning for an emergency transportation network (2024–2026) should explicitly incorporate flood, landslide, and wildfire scenarios. (City of Vancouver, 2025)

Vulnerability Summary

The City of Vancouver Emergency Management Program and the associated service providers are particularly vulnerable to the impacts of extreme heat and wildfire smoke as those are the types of hazards that are more likely to impact service provision as climate conditions worsen. These hazards require the most emergency services and facilities to help alleviate potential human health impacts. Extreme precipitation could interfere with infrastructure, power, and emergency responses, but would be more likely along water bodies or areas with poor drainage.

Census tracts in almost every area have more than one higher climate exposure and either higher health sensitivity or higher equity disparity, which could require a greater emergency response. Areas with a combined higher exposure and higher health sensitivity or higher equity disparity include Areas 1, 2, 4, 6, 7, and 8. Area 3b has higher heat but exposure to other climate impacts is less than "higher." See Exhibit 57.

Exhibit 58: Vulnerability by Census Tracts – Emergency Management

Census Tract	Area	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index
53011041005	1	Medium-high	Higher	Lower	Higher	Higher	Higher
53011042300	2	Medium	Medium-high	Higher	Medium-high	Higher	Medium-high
53011042400	2	Higher	Higher	Medium	Higher	Higher	Higher
53011041113	3b	Higher	Medium-high	Medium-low	Medium-high	Higher	Higher
53011041114	3b	Higher	Medium	Medium-low	Medium-high	Higher	Higher
53011041600	4	Medium-high	Higher	Medium	Higher	Higher	Higher
53011041700	4	Medium	Higher	Medium	Medium-high	Higher	Medium-high
53011042700	4	Medium-high	Higher	Medium	Higher	Higher	Higher
53011041205	6	Medium-high	Higher	Medium-high	Higher	Medium-high	Higher
53011041206	6	Higher	Medium-low	Medium-high	Medium-high	Higher	Medium-high
53011041207	6	Medium	Medium-low	Higher	Medium	Medium	Higher
53011041312	7	Higher	Higher	Medium-low	Higher	Medium-high	Higher
53011041322	8	Higher	Medium	Medium-high	Higher	Medium-high	Higher
53011041323	8	Higher	Medium	Medium-high	Higher	Medium-high	Higher

Source: See Chapter 2 for indicators and methods. BERK, 2025.

A summary of risks is shared below in Exhibit 58.

Exhibit 59: Risk Summary – Emergency Management

Likely Climate Impacts in next 10+ years				Magnitude of Loss			City Responsibility			Vulnerable Communities			Areas Most Affected								
Heat	*Fire*	*Precip*	*Drought*	*Less*	*More*	*Most*	*Less*	*More*	*Most*	*Less*	*More*	*Most*	1	2	3A	3B	4	5	6	7	8

Source: BERK, 2025.

Certain actions can be taken to mitigate the risks of these hazards and the overall adaptive capacity to manage these hazards is high due to the clear instructions, strategies, and chain of command laid out in the Emergency Management Plan. Hazards may put stress on personnel and facilities and increase the need for resources; the City can build upon its current emergency services as a foundation and increase services as climate related hazards worsen and increase in frequency.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

Currently, the City of Vancouver provides several online materials for emergency preparedness and resiliency. About 1 in 5 households speak a language other than English at home such as Spanish, Indo-European, and Asian and Pacific Island languages. Understanding the best formats and venues to receive and share information in appropriate languages could be helpful in engagement around community assets and needs There are physical and procedural gaps that hinder preparedness and resilience: limited cooling centers with adequate space and signage, public transit challenges during storm events, lack of emergency information in multiple languages, and difficulty navigating scattered resources. (City of Vancouver, 2025)

Resilience Rising engagement (pages 6 and 7) identified the following strategies that could be implemented to improve information, communication, and facilities:

- Build formal partnerships with community-based organizations that already serve vulnerable populations during emergencies. Fund their preparedness outreach, include them in emergency planning and drills, and ensure they have access to real-time updates and supplies.
- Develop neighborhood-scale pilot projects such as mobile clean air/cooling units in areas lacking brick-and-mortar shelters.
- Provide resilient public assets in East Vancouver since there are currently long travel distances to cooling centers and limited transit options.
- Incorporate accessibility and equity into facility design, such as signage and wayfinding in multiple languages, and proximity to public transit and walking paths.

In addition, the Asset Capacity Assessment identified improvement strategies such as:

- Provide backup power and HVAC resilience audits for all essential service facilities and shelters.
- Ensure that future planning efforts address WUI-specific fire risk, especially in relation to mobility constraints and critical facility access.

Other Climate Adaptation Strategy recommendations were to:

- Improve and increase access to cooling centers, clean air quality centers, and other resource centers during extreme climate events.
- Coordinate with the County to incorporate projected climate risks into future hazard plans.

- Support safe environments at home and work during extreme climate events. (Hatch Planning and City of Vancouver, 2022)

Policies

A policy audit suggested Comprehensive Plan policy revisions and additions similar to those identified in the strategies above, as well as:

- Adopting additional policies to the Public Facilities and Services Element that include emergency operations.
- Incorporating strategies from the Natural Hazard Mitigation Plan into the Comprehensive Plan, such as determining critical government functions and establishing redundancy for these functions.
- Integrating the Vancouver 2018 Emergency Operations Plan strategies such as EMS, Fire, Police, and Debris Removal.

The **OUR VANCOUVER 2045** plan includes the following policy ideas:

- Develop plans and resources to ensure effective emergency response and equal access to emergency services and recovery resources, mitigating risks from natural disasters, climate-related hazards, and social hazards. (Policy 43)
- Support public safety through investment in emergency services, facilities, infrastructure and coordinated preparedness efforts that strengthen community resilience and response. (Policy 109)
- Coordinate with the Vancouver Fire Department and Vancouver Police Department to plan for expected growth, equitably serve the community, and facilitate emergency response. (Policy 38)

Health & Well-being

Sector Overview and Assets

There are various factors in the built environment, natural environment, and public services that affect public health, many of which are likely to be impacted by climate change to some extent. Cross connections to other sectors reviewed in this assessment include Agriculture & Food Systems (food access), Buildings & Energy (safe and healthy housing), Economic Development (financial stability), Water Resources (water quality), Transportation (active transportation and air quality), and Zoning & Development (tree canopy and parks access). The Human Health sector itself is focused on healthcare services as well as the general health and wellbeing of residents.

Population health statistics for adults in Vancouver are similar to that of Clark County as a whole, with slightly higher rates of poor mental health and asthma and slightly lower rates of hypertension and diabetes than the county population. See Exhibit 59. With hypertension affecting almost a third of adults in Vancouver, poor mental health affecting almost a fifth, and asthma affecting more than a tenth, many individuals may be particularly sensitive to the health impacts of climate change, particularly extreme heat and extreme precipitation. (Hayden, 2023) (EPA, 2021)

Exhibit 60: Health Data for Vancouver and Clark County

Measure	Vancouver (% of adults)	Clark County (% of adults)
Hypertension (High Blood Pressure)	28.1%	29.2%
Asthma	11.5%	10.8%
Coronary Heart Disease	5.1%	5.3%
Chronic obstructive pulmonary disease (COPD)	6.3%	6.1%
Diabetes	8.8%	9.2%
Poor Mental Health (mental health not good for 14 days or more)	17.5%	15.8%
Poor Physical Health (physical health not good for 14 days or more)	11.7%	11.2%

Source: (CDC, 2024)

Individuals living with disabilities may also be more sensitive in a climate event due to health and medication needs, mobility challenges, and information accessibility. (Hayden, 2023) Approximately 9.7% of Vancouver residents are living with a disability (Design Workshop, 2024).

Children and older adults also tend to have more medical needs and be more sensitive to air quality, heat, and other climate impacts. 22% of the population is children and youth under age 18, including 6% of the population under age 5, and 16% of the population is over age 65 (Design Workshop, 2024).

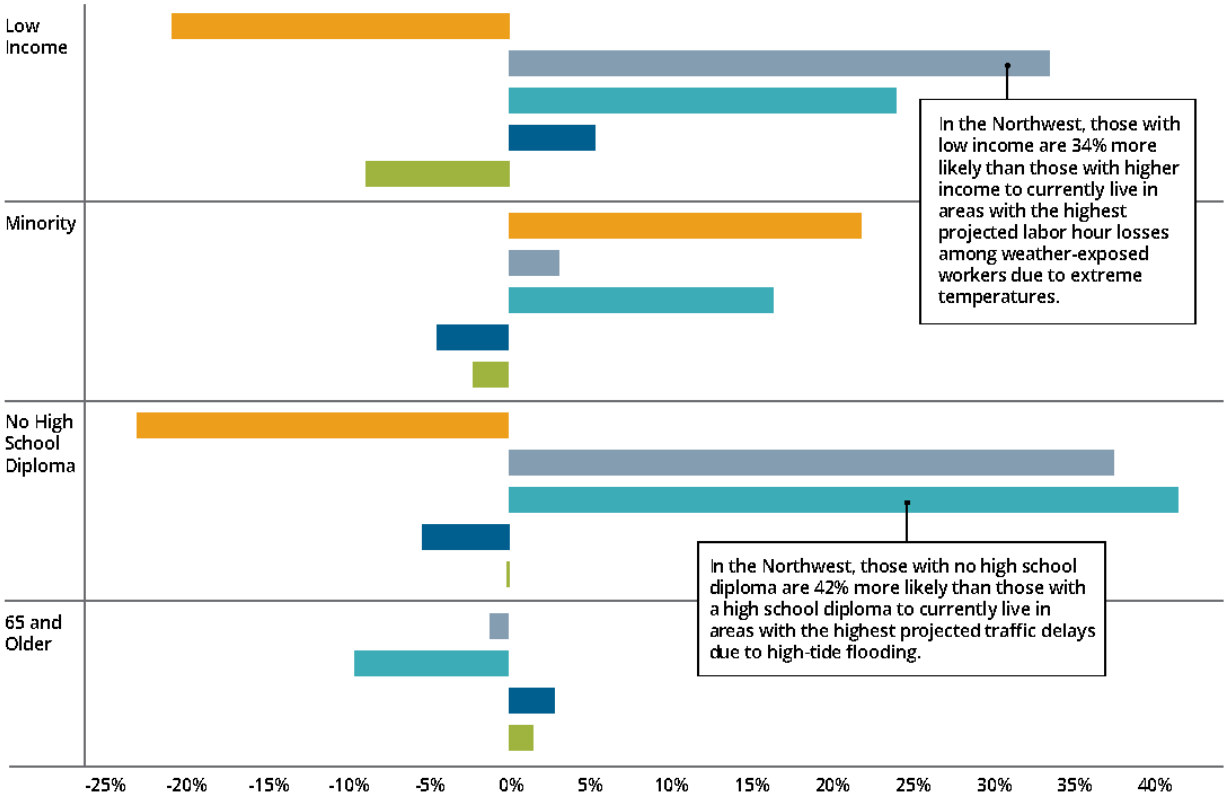
Another key factor in human health is access to health insurance. The CDC estimates that 9% of adults aged 18-64 in Vancouver do not have health insurance, which is slightly lower than the national estimate of 11% (CDC, 2024).

Different parts of the Vancouver population are likely to experience varying health impacts due to climate change, based on existing health concerns and sensitivities, as shown in Exhibit 23.

Low income and non-White residents and residents with less than a high-school diploma are more likely to experience greater impacts due to climate change. This includes labor hour losses to extreme heat, traffic delays due to flooding, and new asthma diagnoses especially in children due to exacerbated air pollution. (EPA, 2021) See Exhibit 60 illustrating these conditions with a focus on Northwest populations.

Exhibit 61: Differences in Risks to Socially Vulnerable Groups in the Northwest Relative to Reference Populations with 2°C of Global Warming

The estimated risks for each socially vulnerable group are relative to each group's "reference" population, defined as all individuals other than those in the group being analyzed. The estimated risks presented in the chart are for scenarios with 2°C of global warming (relative to the 1986-2005 average) or 50 cm of global sea level rise (relative to 2000). For the inland flooding analysis, the baseline is 2001-2020. Results for additional scenarios are provided in the respective chapters and appendices.



AIR QUALITY AND HEALTH*
New asthma diagnoses in children due to particulate air pollution.

EXTREME TEMPERATURE AND LABOR
Lost labor hours for weather-exposed workers.

COASTAL FLOODING AND TRAFFIC
Traffic delays from high-tide flooding.

COASTAL FLOODING AND PROPERTY
Property inundation due to sea level rise.

INLAND FLOODING AND PROPERTY
Property damage or loss due to inland flooding.

*Impacts not estimated for 65 and Older.

Source: (EPA, 2021)

Air quality is a health issue of particular concern in Vancouver. The Washington State Department of Ecology has identified Vancouver as an overburdened community due to elevated levels of $PM_{2.5}$ compared to the rest of the state, as well as rates of poverty, linguistic isolation, and unaffordable housing. (Washington Department of Ecology, 2023) Poor air quality has been linked to negative health outcomes in overburdened communities, including heart and lung disease, lower life expectancy, and older adult mortality.

The healthcare system in Vancouver includes two hospitals in Area 2 (PeaceHealth and Vancouver VA Medical Center), and one in Area 6 (PeaceHealth Southwest Medical Center) as well as clinics across the city. Pharmacies and health-related human services are also located throughout Vancouver.

Assets for human health in Vancouver include:

- Community wellbeing
- Healthcare system
- Hospital
- Pharmacies
- Clinics
- Health-related human services

Source: (Design Workshop, 2024)

Potential Impacts

Heat, wildfire, and smoke are the climate impacts most relevant to human health, per the UW Climate Impacts Group (UW Climate Impacts Group, 2024). Certain groups are more sensitive to these impacts than others. Healthcare infrastructure is also likely to be affected due to demands on the power grid and increases in medical needs, putting pressure on existing resources.

- The Health Sensitivity to Climate Index (see Exhibit 23) suggests the west and central areas are more sensitive than the east area.
- Equity scores (see Exhibit 20) vary across the city, with somewhat lower equity scores generally in the West area (with the exception of the Fruit Valley neighborhood, which has high equity scores or greater equity concerns). Equity scores are mixed throughout the rest of the city. High equity scores may indicate greater sensitivity to health impacts of climate change.
- Warmer summers are expected to increase concentrations of air pollutants, such as ozone and some vector-borne illnesses. This could amplify existing air quality concerns in Vancouver.

- An increase in the number of days with a maximum humidex above 90°F and increase in the number of nights with minimum humidex above 65°F are expected to increase heat-related deaths, illness, and hospitalizations. This directly affects public health as well as healthcare systems.
- More frequent wildfires in the region could reduce human health through loss of life, injury and reduced mental health associated with displacement. Poor air quality due to more wildfire smoke can cause adverse respiratory health effects. Increased healthcare needs during such events could put pressure on medical facilities and staff.
- Individuals with existing health conditions, children, and older adults are likely to be more sensitive to heat and smoke events.
- Renters may be more susceptible to heat and smoke risks given less control over making improvements to their homes, such as insulation and air conditioning systems.
- People living in lower-quality housing with minimal insulation will be less able to cool their homes during heat events and may be more susceptible to smoke exposure. Households with lower incomes are likely to be affected more by the cost of increased energy needs for cooling. Adaptive strategies such as air conditioners and air filtration systems may also not be affordable to them.
- Regional assessments have found that many existing community facilities do not meet the filtration or ventilation standards necessary to serve effectively as clean air shelters (Adaptive Capacity Assessment, 2025).
- Individuals experiencing homelessness are especially vulnerable to heat and smoke as they have limited access to safe shelter.
- Individuals with disabilities and mobility challenges may experience barriers to accessing cooling centers or other refuges during heat and smoke events.
- Workers in outdoor professions, such as construction, agriculture, and outdoor recreation, are likely to be more exposed to heat and smoke and have little flexibility in addressing those conditions (see Economic Development).
- High energy demand for cooling could strain the power grid and contribute to outages, which would directly expose more people to heat as their cooling systems go unpowered.
- Households with limited English proficiency may not receive important information about heat and smoke events and available resources if messages are not translated into their primary language.

Adaptive Capacity

Existing programs and conditions in Vancouver can support adaptive capacity to heat, wildfire, and smoke events in the context of human health.

As energy demands go up to cool homes and preserve indoor air quality, home energy efficiency will be increasingly important to the physical and financial health of Vancouver households. Clark Public Utilities offers various rebate and incentive programs for energy efficiency improvements. The Weatherization Assistance Program (WAP) is also a resource available to low-income families to reduce energy costs through improved efficiency.

Several resources already exist to meet immediate needs during heat and smoke events, including community centers and libraries, which can serve as unofficial cooling centers and hubs during heat and smoke events, and temporary cooling centers in collaboration with area churches and other organizations. C-TRAN does not turn anyone away riding to a cooling center. If passengers tell the driver they are going to a cooling center, fares are not enforced. Buses also have air conditioning.

Southwest Clean Air Agency monitors air quality and issues advisories when air quality is poor during smoke events. This connects communities with information they can use to better protect themselves.

Areas of the city with more tree canopy cover are likely to experience lower, safer temperatures during extreme heat events. According to Tree Equity Score, canopy cover varies greatly across the city, with some areas having as low as 8% cover while others have almost 50% cover (Tree Equity Score, 2024). The City's urban forest strategy proposes to increase tree canopy citywide and in equity priority areas. (City of Vancouver, 2023) The City's Treefund and the nonprofit Friends of Trees both provide low-cost trees for planting on private property. (City of Vancouver, 2024)

Hospitals are typically equipped with emergency generators to ensure continuity of services during power disruptions. However, greater frequency of power outages due to increased energy use during heat events could lead to greater emergency energy needs at medical facilities.

Vulnerability Summary

Communities with higher health conditions are expected to have higher vulnerability to extreme heat as well as smoke. Blocks with the combined higher heat and higher health conditions are a greater priority and are found in Areas 2, 3b, 4, and 6. The east side has greater tree canopy cover, which may provide some relief in extreme heat. See Exhibit 61.

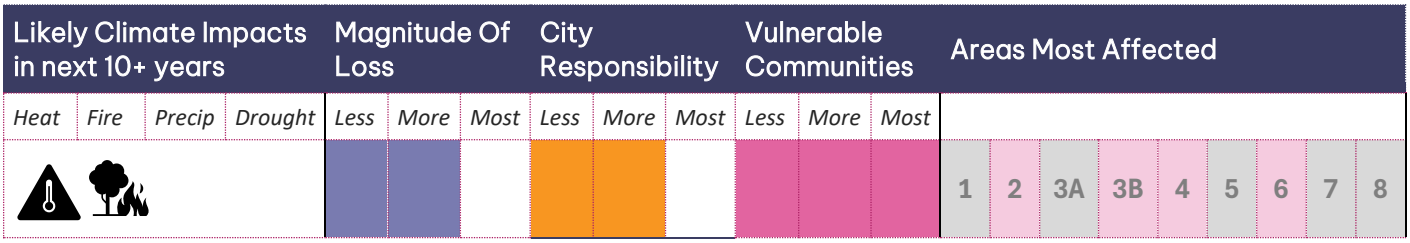
Exhibit 62: Vulnerability by Census Tracts – Health & Well-being

Census Tract	Area	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index
53011041005	1	Medium-high	Higher	Lower	Higher	Higher	Higher
53011042400	2	Higher	Higher	Medium	Higher	Higher	Higher
53011041111	3b	Medium-high	Medium	Medium	Medium-high	Higher	Higher
53011041113	3b	Higher	Medium-high	Medium-low	Medium-high	Higher	Higher
53011041114	3b	Higher	Medium	Medium-low	Medium-high	Higher	Higher
53011041600	4	Medium-high	Higher	Medium	Higher	Higher	Higher
53011042700	4	Medium-high	Higher	Medium	Higher	Higher	Higher
53011041206	6	Higher	Medium-low	Medium-high	Medium-high	Higher	Medium-high

Source: See Chapter 2 for indicators and methods. BERK, 2025.

Areas 5 and 6 also have hospitals that would feel the effects of greater demand for services; see Economic Development.

Exhibit 63: Risk Summary – Health & Well-being



Source: BERK, 2025.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

A previous survey as part of the Clark County Community Needs Assessment found that getting to services, including physical health services, was among the top barriers to social services access (Clark County Public Health, 2024). Climate planning engagement found similar concerns about access to facilities during emergencies due to infrastructure challenges, lack of information or neighborhood connection, and identified improved strategies:

- Increase public awareness of health and safety precautions in the event of extreme climate events. (Hatch Planning and City of Vancouver, 2022)
- Coordinate with local health departments to address impacts of poor air quality on frontline communities. (Hatch Planning and City of Vancouver, 2022)

- Work with community-based organizations and local leaders to organize neighborhood specific community preparedness, through providing meeting spaces, direct funding, information sharing or other mechanisms. (City of Vancouver, 2025)
- Residents suggested spaces (schools, churches, vacant commercial buildings) that would function best as resilience hubs based on community trust and accessibility. (City of Vancouver, 2025)
- In high-risk neighborhoods (e.g. Fruit Valley in the west, the Fourth Plain corridor in the central city, and parts of east Vancouver), the City's Homeless Assistance and Resources Team (HART) team can partner with public health and community organizations to conduct wellness checks on at-risk residents during heat waves or smoky wildfire days. They should also assist with disseminating climate emergency alerts – heat warnings, evacuation orders, air quality advisories – making sure these reach non-English-speaking populations and those with limited access to media. (City of Vancouver, 2025)

See also Emergency Management and Transportation for additional strategies to support and connect communities to essential services.

Policies

A policy audit of the Comprehensive Plan and other City plans showed some policies addressed human health in the context of climate hazards. The audit suggested policy revisions such as:

- Add more language around climate justice and equitable distribution of cooling centers, clean air quality centers, and other resources.
- Explicitly address climate resiliency of assets such as trails and green infrastructure.

Policies developed for the Our Vancouver 2045 plan recognize the underlying health disparities that can make communities more vulnerable to ongoing stressors as well as climate impact events such as extreme heat or adverse air pollution:

- Focus on high environmental health disparities when mitigating the impacts of air, water, heat, noise, and light pollution. (Policy 113)
- Broaden access to essential healthcare and services in underserved populations and address built environment causes of health disparities. (Policy 65)

Ecosystems

Sector Overview and Assets

Extreme heat, drought, flooding, and wildfire could harm ecosystems in Vancouver and the services that nature provides such as food, water filtration, shade, recreation, and more. Ecosystems in Vancouver including the landscape, habitats, and other critical areas are described below and mapped in Exhibit 63.

> An ecosystem is a geographic area where plants, animals, and other organisms, as well as weather and landscapes, work together to form a bubble of life. (National Geographic, 2024)

Geologic Hazards

Vancouver is located within a geologic province called the Portland Basin, in the northern terminus of the Willamette Lowland in Oregon. The city largely has a flat terrain due to ancestral flooding along the Columbia River, although there are areas of steep slopes, landslides, erosion, and liquefaction hazard areas along portions of the Columbia River, Burnt Bridge Creek, and Vancouver Lake. (Washington Department of Natural Resources , 2024) (WSP USA, 2023)

Water Resources

Vancouver is located in the Salmon-Washougal Watershed known as Water Resource Inventory Area (WRIA) 28. Most of Vancouver is contained in the Burnt Bridge sub-basin and to a lesser degree in the Salmon and LaCamas subbasins on the north and east respectively. Within the basin, growth, agriculture, and other consumption have resulted in lower stream flows and groundwater impacting fisheries. The Department of Ecology notes: *The impacts of climate change in WRIA 28 are also yet to be fully realized. However, it is apparent that water availability is limited throughout the Salmon-Washougal Watershed.* (Ecology W. D., WRIA 28 Salmon-Washougal Watershed Water Availability, 2023)

Major surface waters in Vancouver include the Columbia River, Vancouver Lake, and Burnt Bridge Creek. Frequently flooded areas in the City are found along these major surface waters, and areas between Vancouver Lake and the Columbia River. Other streams include Salmon Creek, Love Creek, Curtin Creek, Fisher Creek, and others. (WSP USA, 2023) The Columbia River, Burnt Bridge Creek, Salmon Creek, Curtin Creek and Vancouver Lake are on the 303d list for water quality impairments such as temperature, sediment, and more.

Vancouver Lake is about 2,600 acres in size and is relatively shallow and is used for recreation. Following flood control structures being placed on the Columbia River, the lake was cut off from the river. A river connection was restored to promote flushing to improve

water quality. Despite dredging and the addition of the flushing channel in the early 1980s, water quality issues remain with algae blooms. A 2014 study helped develop water and nutrient budgets for the lake. (Foreman, 2014) An economic impact study has identified a desire for increasing algae control and flushing, allowing for watercraft passage from the Columbia River, and adding l recreation facilities. (Friends of Vancouver Lake, 2020) Legislative appropriations have supported a phase 1 long-range plan ($150,000) and a phase 2 one-time implementation effort ($330,000). (Clark County Public Works, 2024)

Wetlands and Riparian Areas

Significant wetlands include the Water Resources Education Center Wetlands along the Columbia River, the restored wetlands in the Burnt Bridge Creek Greenway, and those near Vancouver Lake. The Port of Vancouver has established a 154-acre wetland mitigation bank.

Although there has been riparian enhancement along Burnt Bridge Creek, there are stretches that lack sufficient vegetation and shading, which can lead to increased water temperatures and reduced water quality. (City of Vancouver, 2021) (Port of Vancouver, 2024)

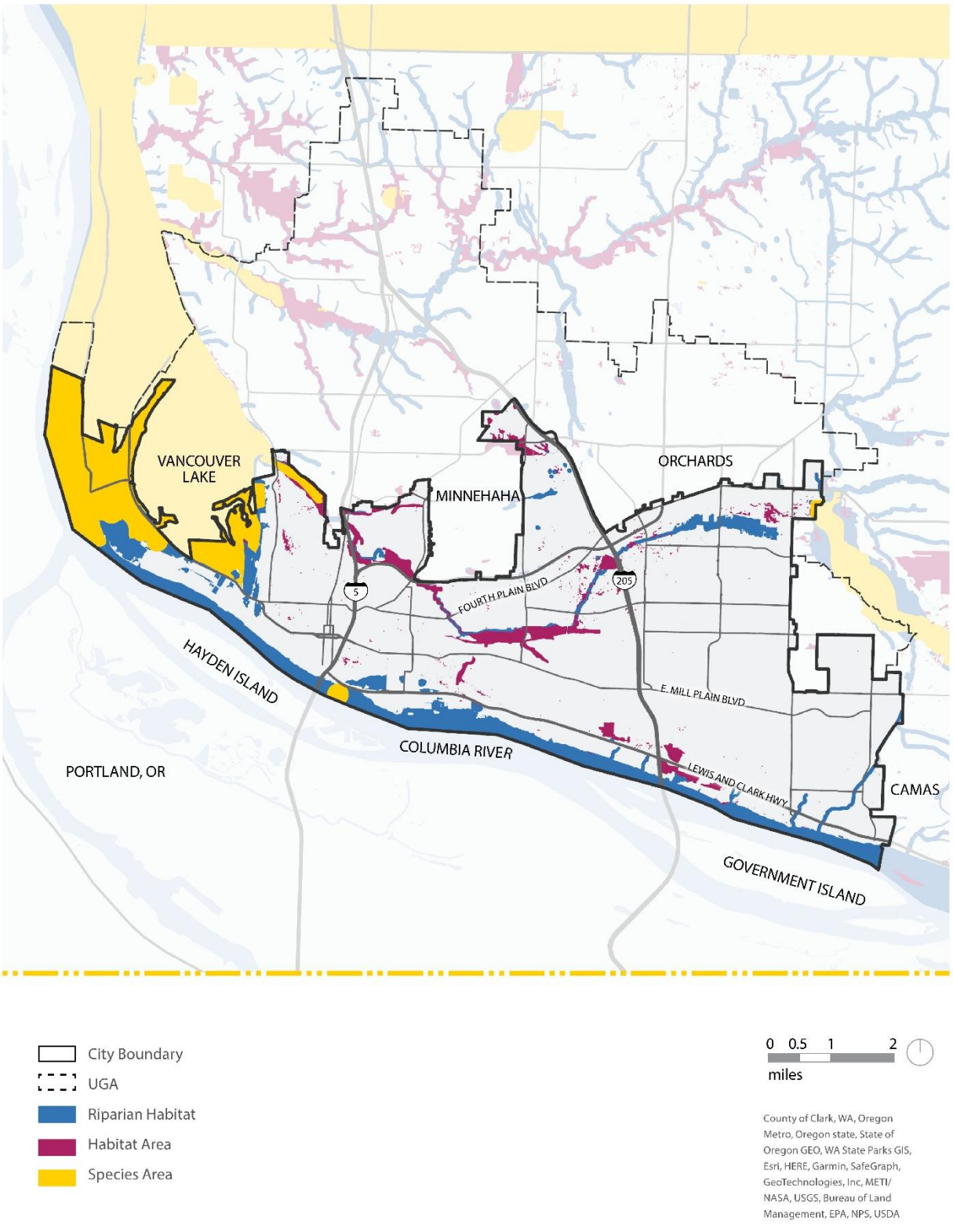
Habitats

Priority habitats in Vancouver include riparian areas, freshwater wetlands, Oregon white oak woodlands, and other biodiversity areas (primarily along Burnt Bridge Creek). (WSP USA, 2023) In or near Vancouver, the Washington Department of Fish and Wildlife has identified priority species including bald eagles, western grey squirrel, chum salmon, chinook salmon, coho salmon, steelhead, great blue heron, peregrine falcon, purple martin, and leopard dace. Bull Trout, along with chum and coho salmon and steelhead, are also listed under the federal Endangered Species Act (ESA). The Columbia River, Lake Vancouver, Burnt Bridge Creek and their shorelines are the primary habitat for most listed species. (City of Vancouver, 2021)

Tree Canopy

Trees are an important part of Vancouver's natural and urban setting. As of 2021, tree canopy currently covers 18.9% of Vancouver' land area. There is a possible planting area of 31.8%. While most neighborhoods have between 16 and 20% tree canopy, about 13 neighborhoods have between 5 and 15% canopy. The citywide goal is 28%. (City of Vancouver, 2023) While more designated habitat is located in the west and south along Lake Vancouver, Burnt Bridge Creek, and the Columbia River, tree canopy is more present in eastern Vancouver. See Zoning & Development for additional information on tree canopy.

Exhibit 64: Critical Areas in Vancouver



Source: WSP, 2025.

Potential Impacts

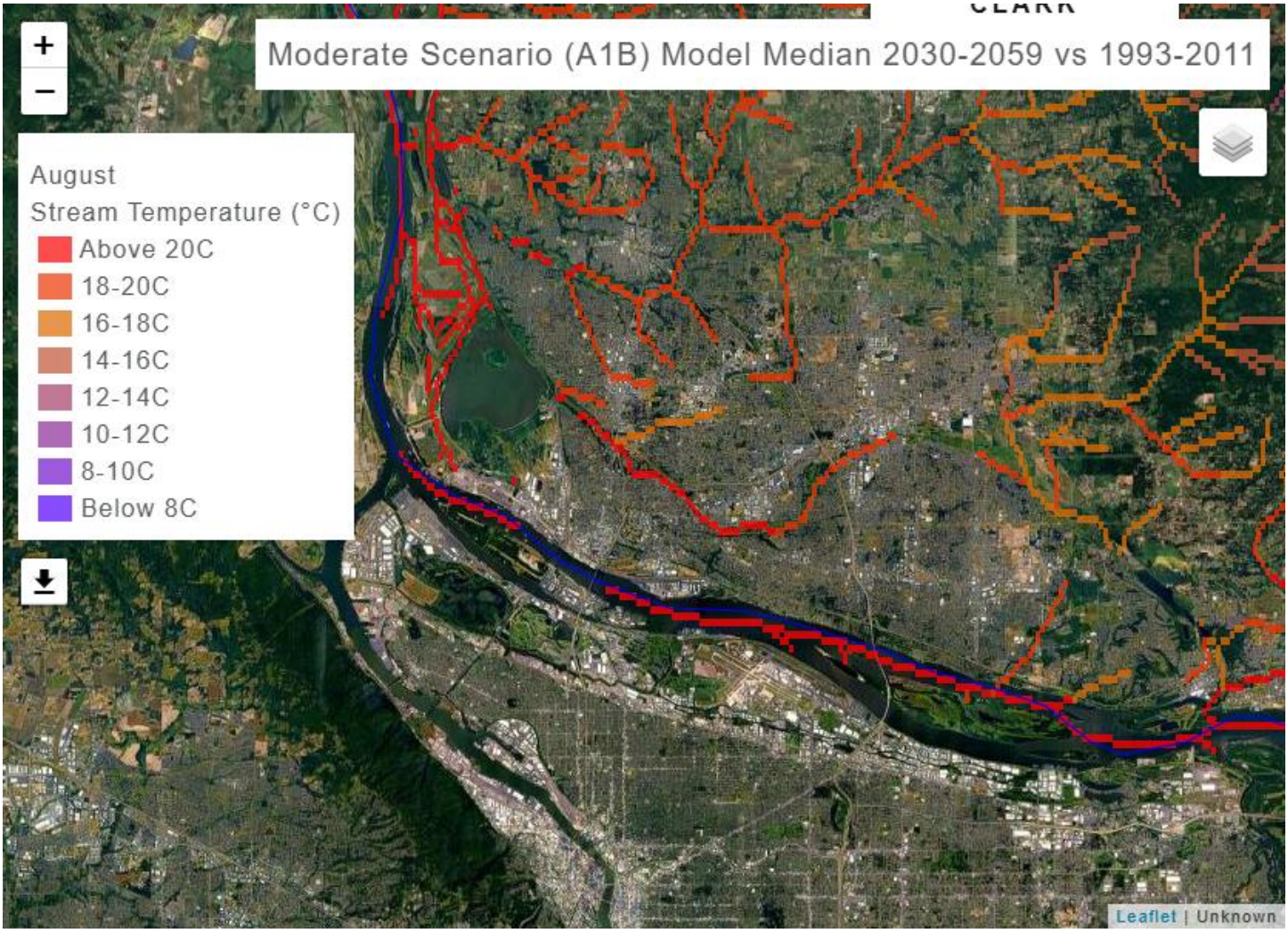
A best available science technical report (WSP USA, 2023) identified potential impacts of climate change to the City's critical areas including extreme precipitation and flooding in existing and future floodplains: As the impacts of climate change become more prevalent, floods are expected to become more frequent. The study recommended that Vancouver consider the future flow floodplain at buildout, the potential effects of climate change, and the effects of increasing impervious surfaces when designating frequently flooded areas (WAC 365-190-110). The study also suggested the City consider regulating severe risk channel migration zones as floodways, where new development is generally not allowed.

Increased stream flows can scour streams, increase sedimentation, and damage riparian areas. Wider culverts may be needed to support fish passage. Lower summer stream flows can reduce fish habitat quality. Some of the present water quality impairments could worsen, increase pathogens, and harm native cold-water fish. Algal blooms could increase in Lake Vancouver or other freshwater bodies. (Raymond, 2022) (Shirk, 2021) (Rentz, 2020)

Due to reduced summer precipitation, average August stream temperature is anticipated to increase in some Vancouver streams by 2040:

- 20.9 °C Burnt Bridge Creek
- 18.4 °C Fisher Creek
- 23.1 to 23.6 °C Columbia River

Exhibit 65: August Stream Temperature – 2030-2059



Source: (Raymond, Climate Mapping for a Resilient Washington, 2022)

Wetlands could be harmed by changes in the amount and timing of precipitation, or changes in peak flows where associated with floodplains. (Shirk, 2021)

Increased heat and drought can impact tree canopy that may not be acclimated to changing conditions. This could exacerbate the heat island effect.

> *Urban trees already have an uphill struggle to reach their maximum size and function due to the competition for space, elements of an urban environment, vandalism, pests and diseases, among other factors and stressors. Abnormally high temperatures and prolonged heat can have a negative impact on established trees especially those not acclimated or unable to adjust to these changes. (City of Vancouver, 2023)*

Shifts in seasonal temperature and precipitation could alter the range of Oregon white oak, Douglas-fir and other species and lead to pest and disease outbreaks. (Mauger, et al., 2015) Oregon white oaks are tolerant to drought and periodic wildfire may facilitate sprouting of oak, but frequent fire could damage soil and allow for invasive species. (Hudec, Halofsky, Peterson, & Ho, 2019) (WSP USA, 2023)

Adaptive Capacity

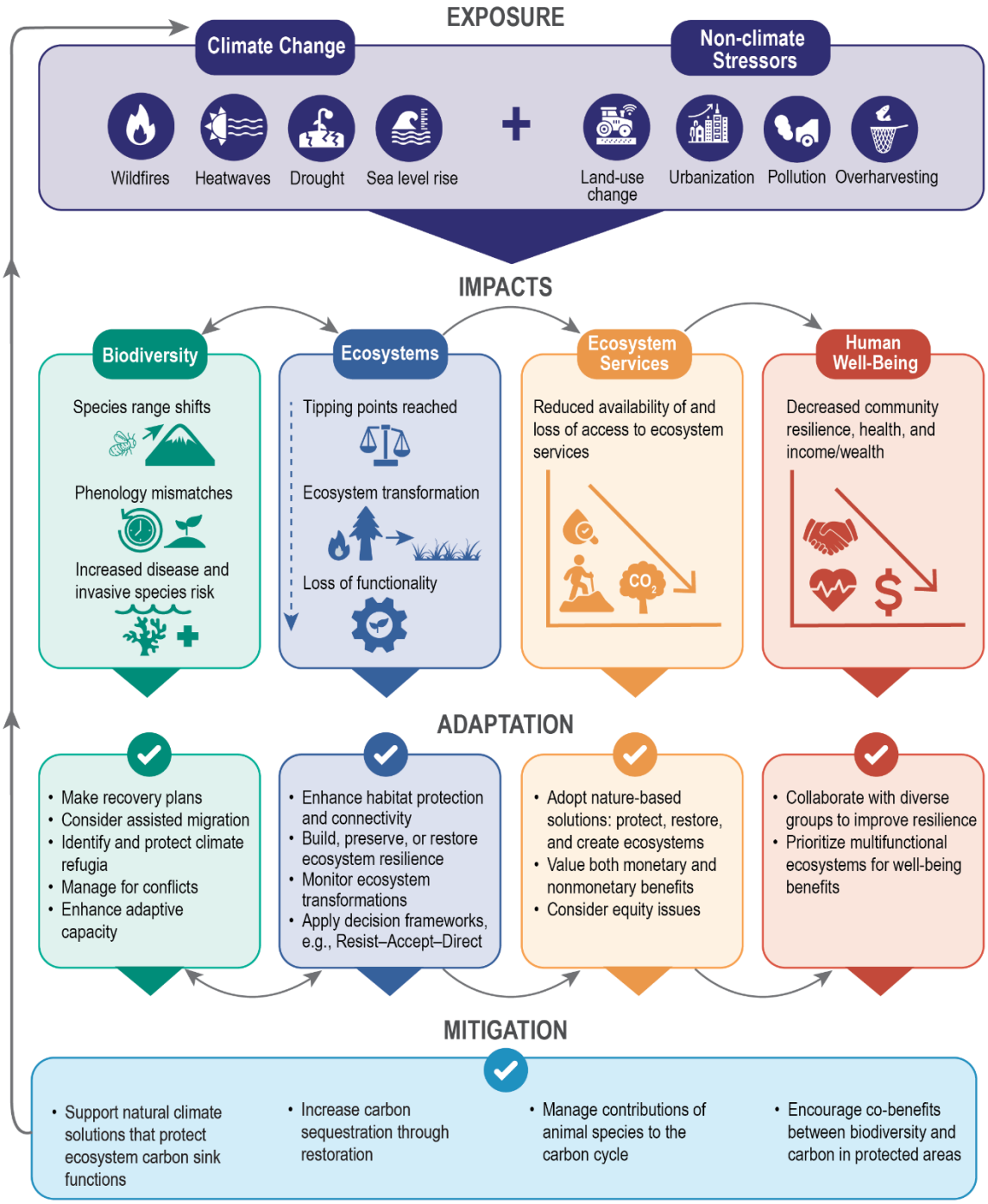
Ecosystem policies can support both adaptation and climate mitigation per Exhibit 65.

Similar to adaptation measures in the graphic, the City's provides robust regulations to protect ecosystems:

- The City regulates the protection of critical areas and shorelines. Vancouver is proposing to increase required stream buffers to match state recommendations regarding site potential tree height. (City of Vancouver, 2024)
- The City is proposing updated standards for wetland buffers and associated habitat corridors. (City of Vancouver, 2024) Less disturbed wetlands can support carbon sequestration to help reduce GHG emissions. (WSP USA, 2023)

The City recently updated its Urban Forestry Management Plan and last amended its tree protection regulations in 2023 (VMC 20.770). (City of Vancouver, 2023)

Exhibit 66: Climate Change and Ecosystems, Biodiversity, and Ecosystem Services



CAPTION: Species and ecosystems respond to pressures in different ways, such as shifting their locations or transforming into new, often degraded systems less able to provide ecosystem services.(Weiskopf et al. 2020) Adaptation measures can help species and ecosystems cope with some climate impacts but are not always going to be effective or feasible, requiring increasingly difficult decisions on what resources to prioritize and what changes to accept.(Prober et al. 2019) Adapted from Lipton et al. 2018.(Lipton et al. 2018) (McElwee, 2023)

Vulnerability Summary

A tract-level matrix of vulnerability for ecosystems is provided in Exhibit 66. Sensitive ecosystems with exposure to extreme heat, drought, or extreme precipitation include Vancouver Lake in Area 1, Burnt Bridge Creek in areas 2, 4, 6, and 7, and the Columbia River in Areas 1, 2,5, 6, and 8. For these waterbodies and shorelines, there has been progress towards enhancement and restoration but there are still water quality concerns. Vulnerability to climate change is high and the cost to improve water resource functions is also high to fulfill lake management plans, watershed plans, and stormwater plans.

In Area 3A, the exposure is considered Medium-Low and none of the individual exposures are "higher."

Oak Tree habitat is found in Area 5 at Fort Vancouver as well as scattered in other areas. Tree canopy and wildland urban interface is anticipated to be at greater risk in Areas 7 and 8. Providing for wildland urban interface policies and regulations could improve adaptive capacity.

> Climate change is having variable and increasing impacts on ecosystem services and benefits, from food production to clean water to carbon sequestration, with consequences for human well-being (very likely, high confidence). Changes in availability and quality of ecosystem services, combined with existing social inequities, have disproportionate impacts on certain communities (very likely, high confidence). Equity-driven nature-based solutions, designed to protect, manage, and restore ecosystems for human well-being, can provide climate adaptation and mitigation benefits (likely, medium confidence). (McElwee, 2023)

Exhibit 67: Vulnerability by Census Tracts – Ecosystems

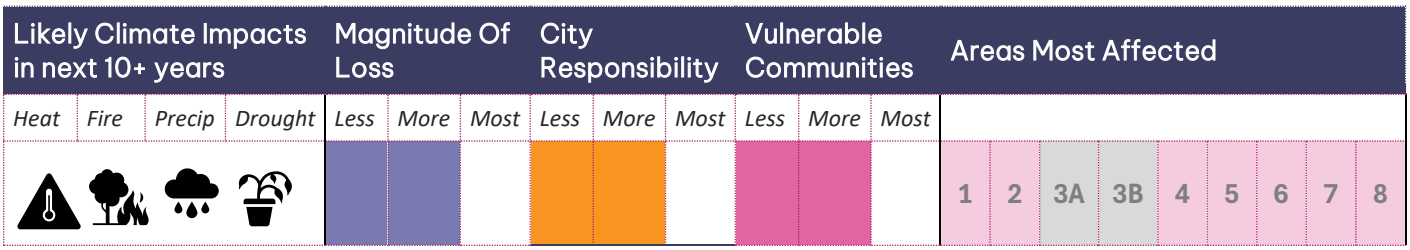
Census Tracts	Subarea	Heat Exposure	Flooding/Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index	Riparian	Habitat	Species
53011041005	1	Medium-high	Higher	Lower	Higher	Higher	Higher	X		X
53011042400	2	Higher	Higher	Medium	Higher	Higher	Higher	X		
53011041003	2	Lower	Medium-high	Higher	Medium-low	Medium-low	Lower		X	X
53011041011	3a	Medium-low	Medium-high	Medium-low	Medium-low	Medium-low	Medium	X	X	
53011041107	3b	Medium-low	Higher	Medium-low	Medium	Medium	Lower	X	X	
53011041203	4	Medium-high	Medium-high	Medium	Medium-high	Medium-high	Medium-high	X	X	
53011041600	4	Medium-high	Higher	Medium	Higher	Higher	Higher	X	X	
53011042601	5	Medium-high	Higher	Medium-high	Higher	Medium	Medium	X		X
53011042602	5	Medium-high	Medium-low	Medium-high	Medium	Medium	Medium-low	X	X	
53011041205	6	Medium-high	Higher	Medium-high	Higher	Medium-high	Higher	X	X	
53011041208	6	Lower	Medium	Higher	Medium-low	Medium	Lower	X	X	
53011042800	6	Lower	Lower	Medium-high	Lower	Medium-low	Lower		X	
53011041312	7	Higher	Higher	Medium-low	Higher	Medium-high	Higher	X	X	

Census Tracts	Subarea	Heat Exposure	Flooding/Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index	Riparian	Habitat	Species
53011041313	7	Medium-high	Medium-high	Medium	Medium-high	Medium-high	Higher	X	X	
53011041334	7	Lower	Higher	Higher	Medium	Lower	Lower	X	X	X
53011041326	7	Medium-low	Higher	Higher	Medium	Medium-low	Medium	X	X	
53011041309	8	Medium-low	Medium	Higher	Medium-low	Medium-high	Medium-high	X	X	

Source: See Chapter 2 for indicators and methods. BERK, 2025.

Based on the evaluation above, the risk of climate impacts to ecosystems is shared in Exhibit 67.

Exhibit 68: Risk Summary – Ecosystems



Source: BERK, 2025.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

Some strategies that could improve ecosystem resilience were identified through climate planning efforts with the community and an interdepartmental team:

- Implement land use planning policies for flood mitigation. This included actions to review regulations such as stormwater and critical areas, and potentially addressing a flood protection overlay zone. (Hatch Planning and City of Vancouver, 2022)
- Consider controlled burns or mechanical thinning in larger natural parks to reduce accumulated fuel (in coordination with fire authorities and when weather permits safe burning) – this can actually improve ecosystem health while lowering wildfire risk. (City of Vancouver, 2025)
- Use parks as venues for climate education: interpretive signs about drought-resistant gardens, or a pilot plot showing a native meadow vs. conventional lawn and explaining water savings. (City of Vancouver, 2025)

Future engagement regarding ecosystem assets could include:

- Watershed sub-basin conditions and identifying priorities by engaging with watershed planning units.
- Prioritizing fish passage barrier removal, enhancing biodiversity corridors, and adding green infrastructure.
- Collaborating with overburdened communities to identify their priority environmental improvements. For example, Vancouver's Resilience Rising and Adaptive Capacity Assessment identified some potential pilot projects for stormwater projects with urban greening and rain gardens (City of Vancouver, 2025) and food forests or edible landscapes in heat-impacted areas (City of Vancouver, 2025)

Policies

A number of Comprehensive Plan policies or Climate Action Framework strategies address ecosystem protection and enhancement. Amended policies could further address:

- Habitat protection for salmonids and listed species by addressing potential impacts to salmon species due to climate change.
- GHG reduction, climate-exacerbated impacts to a policy addressing air quality protection and enhancement.
- Increased frequency/risk of hazards due to climate change (e.g., extreme precipitation) to a policy addressing geologic hazards.
- Issues of insects, invasive species, and increased ecosystem impacts due to climate change related stresses.
- Risk of water quality degradation due to climate change impacts.
- Flood management with green infrastructure and setbacks and protection where necessary.

The **OUR VANCOUVER 2045** plan addresses many of these concepts:

- Ensure that buildings contribute to the City's greenhouse gas reduction goals and protect occupants from pollution, extreme weather, and climate hazards. (Policy 48)
- Improve water quality, protect watersheds and reduce flood risks by promoting groundwater infiltration, reducing runoff, and advancing effective stormwater best management practices. (Policy 136)
- Take inventory of and protect climate refugia, and fish and wildlife habitat needs for species under stress from climate change. (Policy 64)

- Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, protection and rehabilitation of historic and architecturally significant structures. (Policy 66)
- Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide-free landscaping, enhancing biodiversity, and connecting natural spaces across the city through pollinator-friendly plantings. (Policy 103)

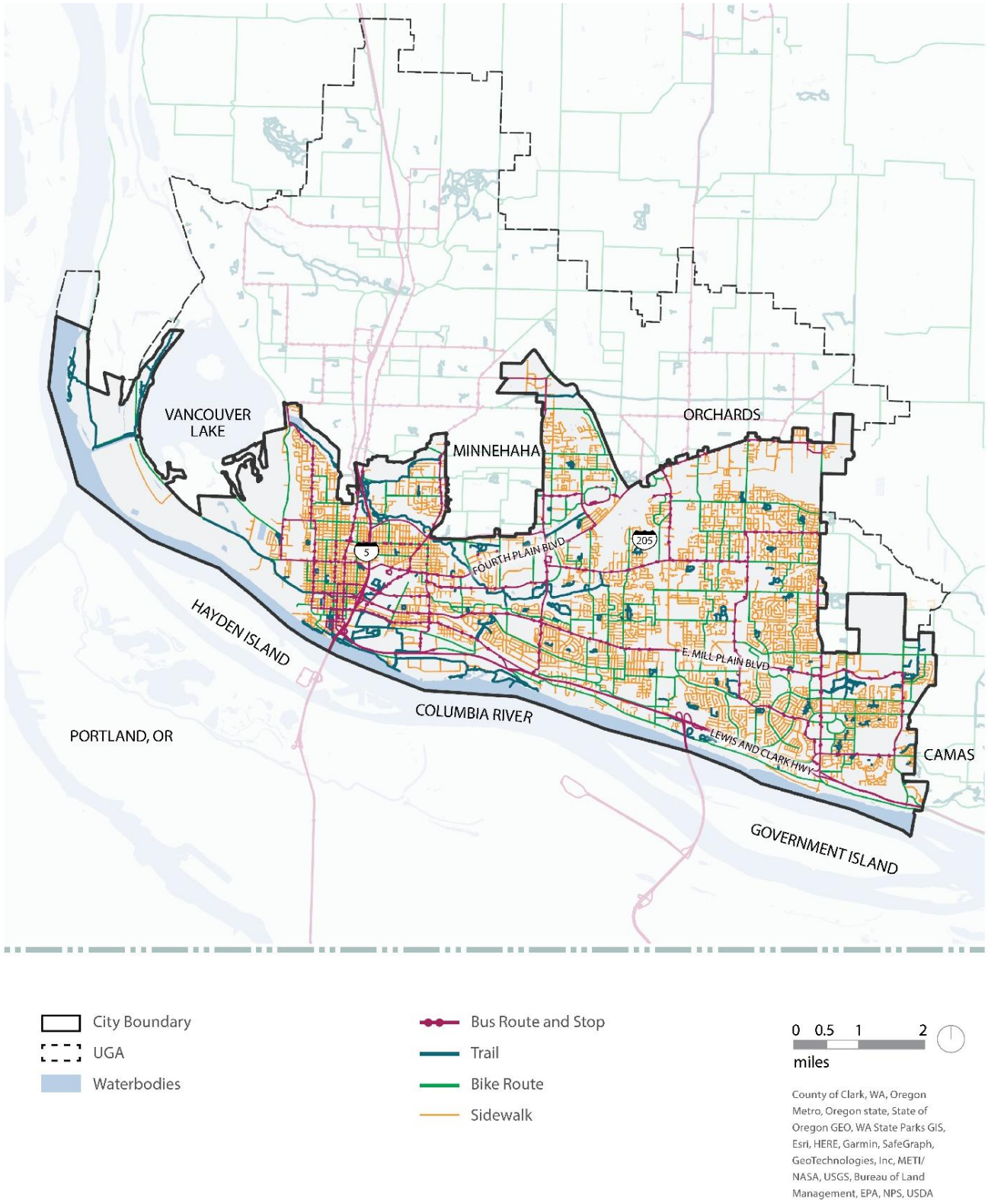
Transportation

Climate related hazards have the potential to negatively impact transportation services necessary for other sectors like Zoning and Development, Economic Development, Emergency Services, and more. Roads, sidewalks, bridges, and transit facilities are vital to maintain access and connectivity for a resilient transportation system.

Sector Overview and Assets

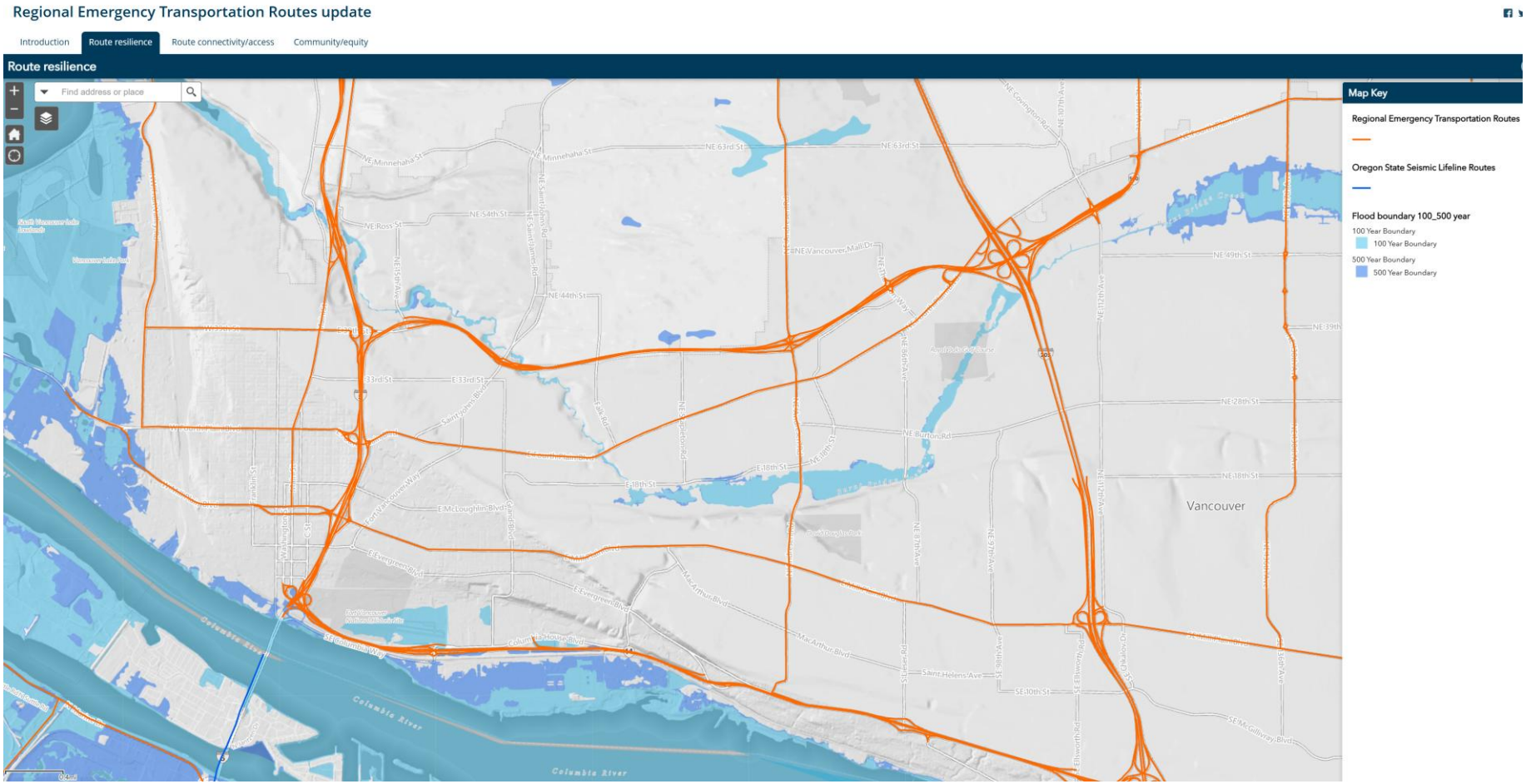
Transportation assets include three major highways such as Interstates 5 and 205 as well as Washington State Routes 14 and 500, transit centers that connect large swaths of the city with services via bus include the VA, 99th street, Fisher's Landing, Mill Plain, and Vancouver Mall Transit Centers. See Exhibit 68. Major roads that are considered part of the regional emergency transportation routes are shown in Exhibit 69 with several locations in floodplains such as Areas 1, 5, 6, and 7.

Exhibit 69: Multimodal Transportation Assets in Vancouver



Source: (Design Workshop, 2024)

Exhibit 70: Regional Emergency Transportation Routes in Vancouver Area and Floodplains

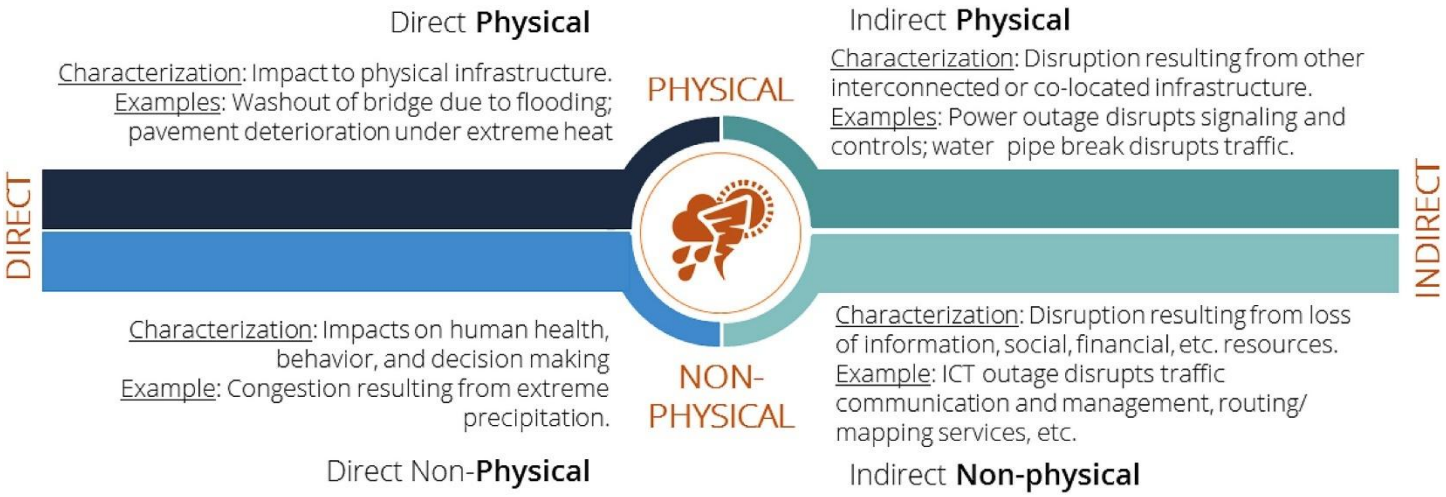


Source: (RDPO, 2024)

Potential Impacts

Bike, pedestrian, and vehicular infrastructures are susceptible to roadway flooding and damage from extreme heat and precipitation that can impact the ability of residents to reach grocery stores, hospitals, and several other vital resources during climate related events. Examples of physical and non-physical transportation system impacts are described in Exhibit 70.

Exhibit 71: Direct and Indirect Climate Change Impacts to Transportation Infrastructure



Source: (Samuel A. Markolf, 2019)

Extreme precipitation can create roadway flooding hazards that have major impacts on transportation routes, damage infrastructure and increase maintenance and repair costs. These specific impacts are limited in exposure for a majority of the city per FEMA flood risk mapping (FEMA, 2021) and Vancouver's Annex to the 2023 Clark Natural Hazard Mitigation Plan (Clark Regional Emergency Services Agency, 2023), but can more severely impact the east and central areas as shown in Exhibit 17. Wildfire related hazards such as smoke and roadside brush fires could increase in likelihood and severity. These specific hazards can disrupt travel by increasing road closures from roadside brush fires near the wildland urban interface (Washington State Department of Natural Resources, 2024), and delaying time sensitive roadway maintenance for the sake of protection of outdoor workers (L & I, 2022).

Wildfire smoke events can create additional health impacts for vulnerable populations that may be dependent on transit and non-motorized transportation. In cases such as this, seeking medical attention can create additional exposures and worsen existing conditions. Additional information on wildfire smoke related health hazards can be found in the Health & Well-being section of this document. While exposure to wildfire smoke and extreme heat impact largely the same vulnerable segments of the population, there may be fewer

transportation resources and services available for vulnerable communities seeking refuge from poor air quality.

Extreme heat events may lead to roadway and sidewalk damage as a result of prolonged exposure of asphalt and concrete to extreme heat. The risk of this potential impact is low but the impact is quite high as it will increase maintenance requirements and costs while preventing effective transportation for emergency personnel or those needing to access their services (Fischels, 2021). Extreme heat can also put strain on public transportation assets during acute heat events both in infrastructure assets and in demand since public transportation is a common refuge for some low-income individuals as well as those needing to access emergency cooling shelters (City of Vancouver, 2024).

Adaptive Capacity

Vancouver's transportation network is not particularly vulnerable to climate change related hazards when compared with other sectors.

However, the transit network does have a proportionally high number of capital facilities that are vital to the connectivity, health, and safety of the City that, if damaged, could result in severe disruptions to service provision and human health.

The City is at a low risk of erosion and severe riverine flooding impacting roadways, transportation facilities, and bike lanes per the City's 2023 *Natural Hazard Mitigation Plan*. Other hazards such as extreme heat, wildfire smoke, and extreme precipitation leading to acute stormwater flooding could inequitably limit transportation to areas of the city that already have transportation challenges. One example of this is the high potential for active trips (any travel that is not a single occupancy private vehicle) in areas at the highest risk for urban heat island effects. This could damage the potential for non-drivers to reach necessary services and also limit the impact of GHG reduction goals and policies that seek to reduce the overall VMT in personal vehicles and encourage active transportation.

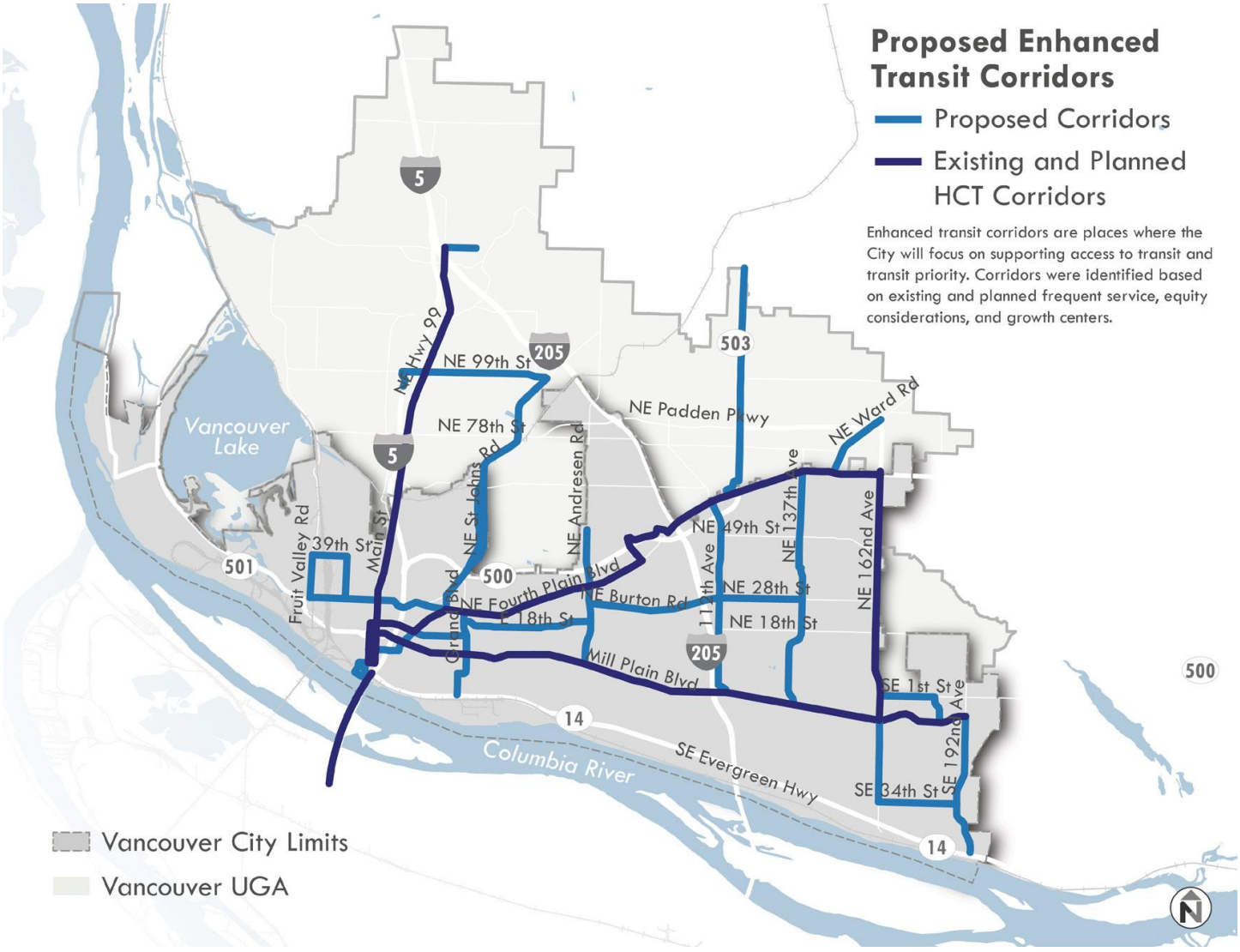
Commuters could be impacted by urban flooding with extreme precipitation, or a lack of power due to energy demand exceeding network capacity during extreme weather (e.g., heat dome). Emergency evacuations could disrupt both workers and residents. Regional emergency plans addressing cross county and cross state road networks are under update as described under Economic Development.

A summary of adaptive capacity (high and low) conditions are noted below:

- Transportation system access could be limited for several groups:
  - ➡ Non-drivers may be unable to access transportation infrastructure without risking exposure to climate hazards. For example, there may be public transit challenges during storm events. In addition, in East Vancouver, there are limited transit options. (City of Vancouver, 2025)Individuals with disabilities and mobility challenges may experience barriers to accessing cooling centers or other refuges during heat and smoke events without risking prolonged exposure. These challenges were reinforced through the Resilience Rising engagement in 2025, which identified inequitable access to resources like air conditioning, clean air shelters, and public cooling infrastructure in part due to transportation limitations for seniors, youth, and people with disabilities. (City of Vancouver, 2025)
  - ➡ Outdoor laborers working on transportation construction projects may have negative health impacts associated with prolonged exposure to wildfire smoke or extreme heat. As climate conditions worsen it is possible that fewer individuals are willing to work in the field of transportation construction which could increase overall costs and delay construction projects significantly without proper protections put in place.
- Plans, programs, and policies that can address climate impacts and improve resilience include:
  - ➡ Pedestrians and Bicyclists including access to transit:
    - Areas of the city such as in the east with more tree canopy cover are likely to experience lower, safer temperatures during extreme heat events. See Zoning & Development for more information by neighborhood.
    - Specific reference to “comfortable” last mile transportation to connect pedestrian and bike infrastructure with C-TRAN network to serve all communities’ transportation needs at each step of their journey even during adverse weather conditions.
    - Vancouver’s Climate Action Framework specifically seeks to mitigate inequity in C-TRAN network by shifting trips to active modes of transportation through network improvements targeted at transit dependent and historically poorly served communities in Vancouver.
    - C-TRAN has a policy of not turning anyone away riding to a cooling center.

- Transit System Sustainability and Resilience:
  - C-TRAN has a Sustainability Policy, and a transition plan to have zero-GHG emissions by 2043 by adding more electric buses. (C-TRAN, 2022)
  - Clark Regional Emergency Services Agency (CRESA) plans to partner with C-TRAN to identify climate-vulnerable infrastructure and retrofit it to ensure longevity of service and to reduce capital project needs.
  - Vancouver's Transportation System Plan identifies existing and planned transit routes. See Exhibit 71.

Exhibit 72: Transit Corridors, Existing and Proposed

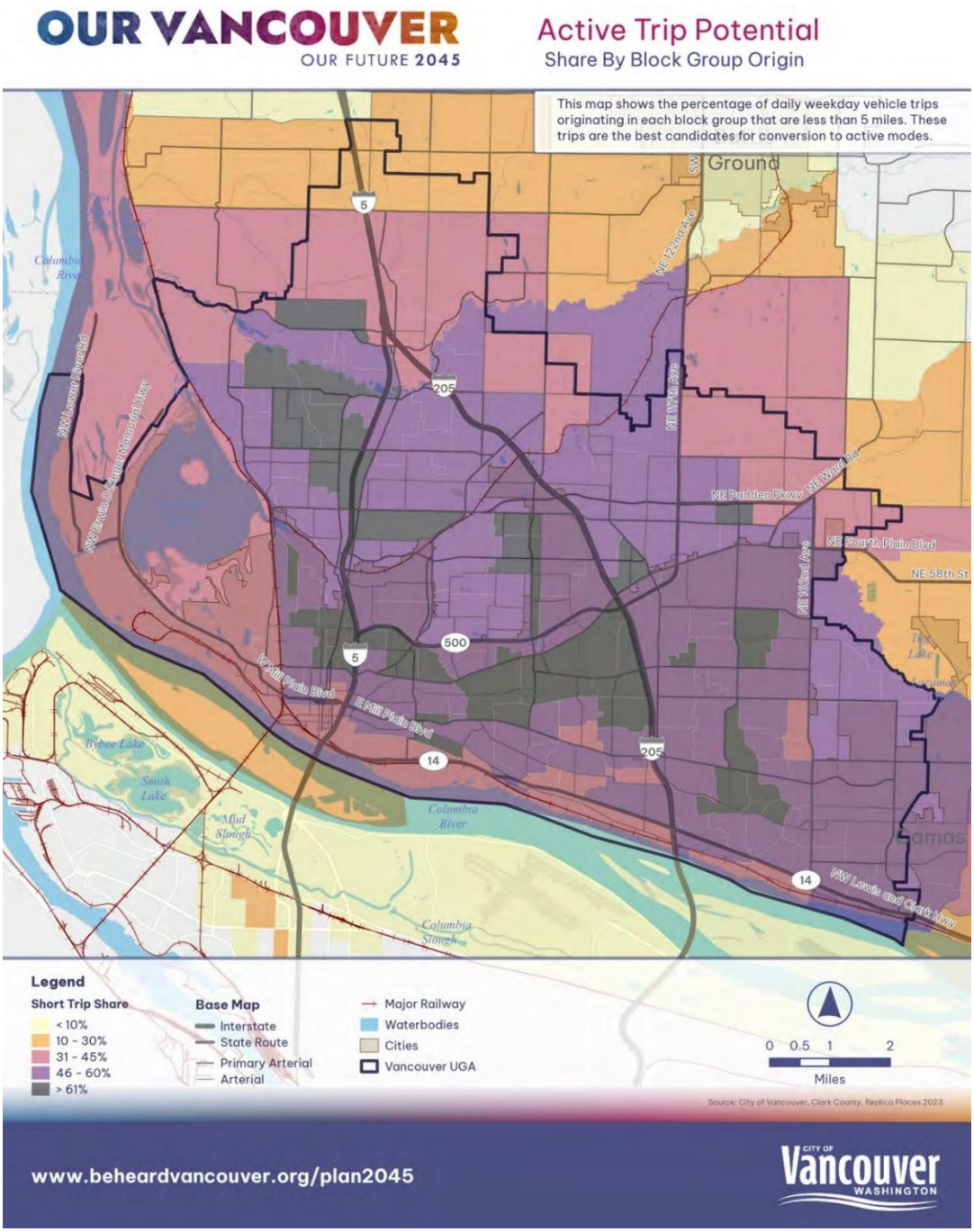


Source:

Source: (City of Vancouver, 2023)

The City has planned for improvements to its bicycle and pedestrian system in the 2023 Transportation System Plan, but more connections could be made to increase active trips. See Exhibit 72,

Exhibit 73: Active Trip Potential as a Share of All Vehicle Trips



Source: Alta, 2024

The City's overall goals and strategies laid out in the Climate Action Framework (City of Vancouver, 2022) and the associated transportation sections of the Emergency Management Plan, coupled with implementation, would be adequate in alleviating the disconnect between areas with low overall access, areas with high active trip potential and areas that are more acutely impacted by climate hazards than elsewhere in the city. This contributes to high overall adaptive capacity to climate hazards both through proposed capital investments and through climate hazard risk reduction strategies.

Vulnerability Summary

A summary of vulnerability for transportation is provided in Exhibit 73 below. Major regional transportation routes that are part of emergency evacuation routes are located in the Areas 2-8. Transit routes are more exposed to heat and smoke in Areas 2, 3b, and 6-8. Lake and river flooding is less likely to impact transportation facilities but urban flooding with extreme events could affect roadways and the residents, businesses, and commuters that rely on them in Areas 1, 2, 4, 5, 6, and 7. Newer street standards have been applied in more recently developed areas in areas 7 and 8.

All communities and businesses rely on different transportation modes and freight. Those with the most vulnerable populations due to disability or exposure to high-volume roads are highlighted below:

- Considering Census tracts with higher shares of people with disabilities who may be more dependent on transit or vehicular transportation and are in areas with higher exposure are in Areas 2, 4, and 8.
- Census tracts with higher climate exposure and proximate to high-volume roads are in Areas 5 and 8. Areas with Medium-High Exposure (including Higher Heat) along with Higher Health or Equity Disparities are in Areas 3b and 6.
- Census tracts with higher flooding potential and vulnerable populations are found in Areas 2, 4, and 8.

All Census tracts included on Exhibit 73 have at least one emergency route, and also have potential for active trips with improved connections for walking, biking, e-bikes, that can help provide redundancy in transportation modes to improve resilience.

Exhibit 74: Vulnerability by Census Tracts – Transportation

Census Tract	Area	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index	Persons with disabilities > 20%	Potential Active Trips	Traffic Proximity Greater than Average	Regional Transportation Routes
53011041800	2	Medium	Medium-low	Medium-high	Medium	Higher	Higher		61% +	X	X
53011041900	2	Medium-low	Medium	Medium-high	Medium-low	Medium	Medium-low		61% +	X	X
53011042400	2	Higher	Higher	Higher	Higher	Higher	Higher	X	31-45%		X
53011041011	3a	Medium-low	Medium-high	Medium-low	Medium-low	Medium-low	Medium		46-60%	X	X
53011041107	3b	Medium-low	Higher	Medium-low	Medium	Medium	Lower		46-60%	X	X
53011041113	3b	Higher	Medium-high	Medium-low	Medium-high	Higher	Higher		46-60%	X	X
53011041114	3b	Higher	Medium	Medium-low	Medium-high	Higher	Higher	X	46-60%		X
53011042700	4	Medium-high	Higher	Medium-high	Higher	Higher	Higher	X	46-60%		X
53011042601	5	Medium-high	Higher	Medium-high	Higher	Medium	Medium		31-45%	X	X
53011041206	6	Higher	Medium-low	Medium-high	Medium-high	Higher	Medium-high		61% +	X	X
53011041207	6	Medium	Medium-low	Higher	Medium	Medium	Higher		31-45%	X	X
53011043100	6	Medium	Medium-high	Medium-high	Medium-high	Medium	Medium	X	46-60%		X
53011041313	7	Medium-high	Medium-high	Medium	Medium-high	Medium-high	Higher		46-60%	X	X
53011041317	7	Higher	Lower	Medium-high	Medium-high	Medium-low	Medium-low		46-60%	X	X
53011041326	7	Medium-low	Higher	Medium-low	Medium-low	Medium-low	Medium		46-60%	X	X
53011041334	7	Lower	Higher	Medium-low	Medium-low	Lower	Lower		46-60%	X	X
53011041310	8	Medium	Medium-high	Higher	Higher	Medium-high	Medium-low	X	61% +		X
53011041320	8	Higher	Medium	Medium-high	Medium-high	Medium-high	Medium-high		46-60%	X	X
53011041329	8	Higher	Medium	Higher	Higher	Lower	Medium-high		46-60%	X	X

Source: See **Chapter 2** for indicators and methods. BERK, 2025.

Higher Exposure & Higher Health or Equity Disparities | Medium-High Exposure & Higher Health or Equity Disparities

A summary of risk is provided below based on the evaluation above.

Exhibit 75: Risk Summary – Transportation



Source: BERK, 2025.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

The Clark County *Community Needs Assessment* found that transportation barriers to social services, health services, and employment was a significant concern in climate vulnerable population throughout Clark County (Clark County Public Health, 2024).

Based on engagement for Resilience Rising and interdepartmental efforts for the Adaptive Capacity Assessment in 2025, many transportation-related strategies were identified to address climate impacts and transportation barriers:

- When implementing public facility retrofits (e.g., HVAC upgrades, power redundancy), also consider proximity to public transit and walking paths. (City of Vancouver, 2025)
- Provide amenities like water fountains or misting stations at key transit centers during extreme heat events so riders can stay hydrated and cool. (City of Vancouver, 2025)
- Making [BRT] making stations into small oases – cooler, with seating, shade, and information – will improve safety and ridership during extreme weather. Prioritize upgrades at stations in heat-prone and socially vulnerable areas (for instance, stations along E. Fourth Plain in central Vancouver, which serves lower- income communities and sees high foot traffic). (City of Vancouver, 2025)
- Identify the chronic flood spots along each BRT route and invest in stormwater infrastructure to mitigate them. This could mean enlarging street culverts, adding extra storm drains, or regrading road surfaces so water doesn't pool in the bus lanes. (City of Vancouver, 2025)
- Integrate climate resilience into all future transit planning and investments. Pursue funding for more covered stations and cooling features as standard design

elements for new projects. The City and C-TRAN can also explore micro- transit or on-demand shuttles for extreme events. (City of Vancouver, 2025)

- Increase sheltered bus stops. By 2045, the aim is that no frequently used stop in a Category A or B tract (see Exhibit 4) is just a bare bench – all have some form of cover or tree shade. (City of Vancouver, 2025)
- At major transfer points or transit centers (like Vancouver Mall, downtown, or 99th Street Transit Center), provide cooling and air quality amenities. (City of Vancouver, 2025)
- Incorporate green stormwater infrastructure around bus stops to handle runoff and reduce flooding. (City of Vancouver, 2025)

Policies

Vancouver's transportation policies are explicit about reducing VMT and would also help reduce GHG emissions and poor air quality. Some policies address the climate resiliency of transportation infrastructure in the event of climate emergencies.

Integrating the TSP policies and the Climate Action Framework objectives and strategies into the Comprehensive Plan would benefit climate mitigation, resilience, and equity as these policies were crafted with climate change in mind.

Waste Management

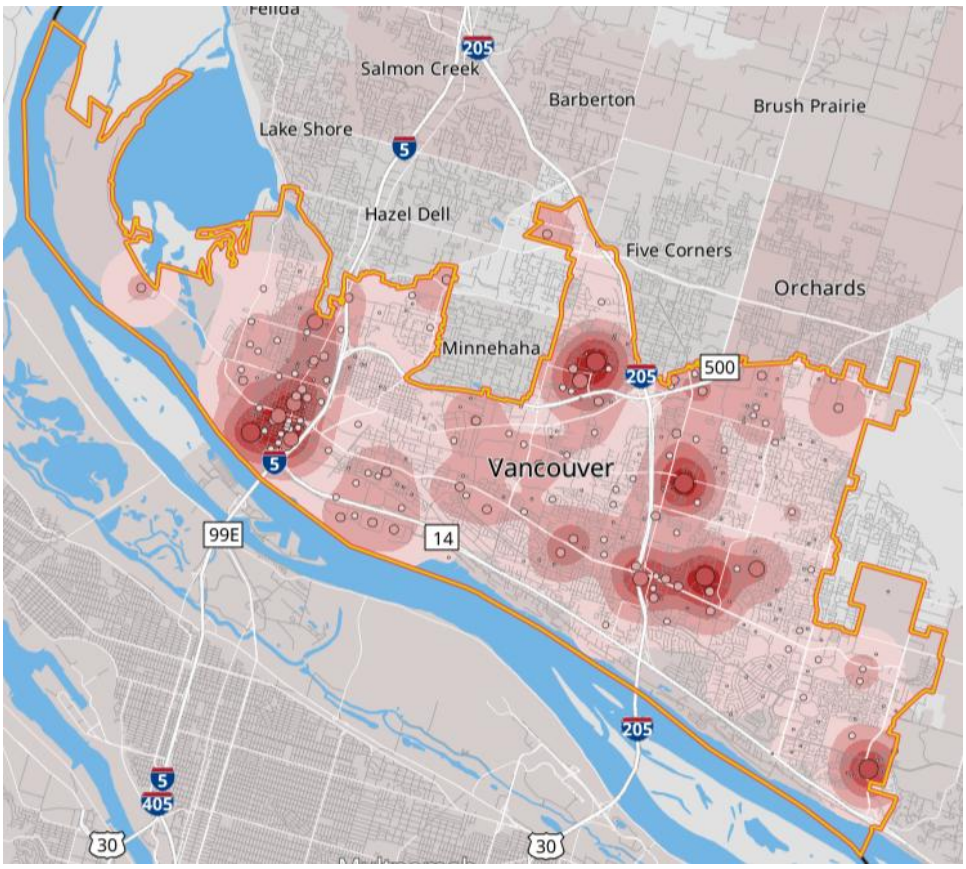
Sector Overview and Assets

The City of Vancouver waste management system is necessary for daily commercial and residential refuse collection and sorting as well as debris clearing during and after extreme weather events. Assets include waste hauling personnel, transfer stations, and heavy rail infrastructure for export from transfer stations to long term waste storage.

The City's solid waste services are contracted to Waste Connections and requires service in all residential areas. Waste hauling requires reliable and safe transportation infrastructure to reach all solid waste customers.

Waste management-related jobs are shown in Exhibit 76, and are primarily found in Areas 2, 3b, and 7. The West Vancouver transfer station is located in Area 1. The Central Transfer and Recycling station is located in the UGA north of Area 7, and a third Washougal Transfer Station is found east of Vancouver.

Exhibit 76: Waste Management and Remediation Services Jobs in Vancouver, 2022



Source: Census on the Map, 2022.

Potential Impacts

Waste management providers in the city do have a low overall risk to service provision due to climate related hazards but are impacted by climate adaptation in other sectors. Transportation network interruptions from roadway damage, flooding, and debris can hinder services and create significant workload increases following climate hazard events. The threat of extreme heat can also increase instances of roadway debris that need to be cleared as part of emergency response.

A summary of potential impacts is shared below:

- Extreme Precipitation
    - Extreme precipitation can impact roadways and other physical waste management assets throughout the city such as transfer stations and hazardous waste storage that has not yet been safely transported to a transfer station.
    - Impacts to waste collection and increases in debris clearing on roadways and on private property.
- Extreme heat
    - Though extreme heat is not directly identified as a threat to waste management assets in the city (UW Climate Impacts Group, 2024), waste haulers are predominantly outdoor laborers and extreme heat can significantly impact their ability safely and effectively service their waste collection routes
- Wildfires and wildfire smoke
    - Waste haulers are predominantly outdoor laborers and wildfire smoke can significantly impact their ability safely and effectively service their waste collection routes.
    - Related to transportation infrastructure, roadside brushfires can impact roadways and delay clearing certain debris for the safety of solid waste staff.

Adaptive Capacity

Programs that address the resilience of the waste management system include debris management elements of the City's Emergency Operations Plan.

- Debris management is included in Vancouver's Emergency Operations Plan (City of Vancouver, 2018) and the Regional Disaster Debris Management Plan and regional Natural Hazard Mitigation Plan.

The City of Vancouver Annex outlines a strategy for managing disaster debris operations and assigns critical response roles and responsibilities. It also provides a timeline of activities based on normal, pre-event, response, and recovery time periods; and includes extensive pre-event messaging and implementing documents. Potential Debris Collection Sites have been identified and surveyed. (Clark Regional Emergency Services Agency, 2023)

- Extreme heat and wildfire smoke protections for outdoor workers provided by Washington State Department of Labor and Industries (L & I, 2022) would apply to waste management employees.
- Increases in tree canopy cover could improve outdoor worker resilience to extreme heat but could also increase roadway debris and strain existing staff and equipment resources.

Capital assets such as the transfer stations and roadway infrastructure to transport sorted solid waste to landfills and recycling plants are resilient to worsening climate hazards as they provide redundant services. This means that if one transfer station is damaged or is out of commission for a climate related hazard the other two have the capacity to service waste haulers, residential customers, and special item drop offs. There are also a large number of sorting facilities and transfer stations outside of city limits that can effectively service these customers but are not technically a part of the City of Vancouver waste system.

Vulnerability Summary

Waste facilities, including a Transfer Station, are located in Area 1 with medium-high heat exposure and higher flooding/precipitation exposure. Waste-related jobs are focused in Areas 2, 3b, and 7 with areas of medium-high and higher heat exposure. See Exhibit 16 and Exhibit 76. Heat in particular would affect outdoor facilities and workers. Facility vulnerability is less than for outdoor workers associated with waste management.

Exhibit 77: Risk Summary – Waste Management



Sources: BERK, 2025.

Gaps and Opportunities

Engagement

Engagement with communities in Vancouver is ongoing in the form of waste reduction strategies and proper waste sorting. Materials on proper waste disposal and hazardous waste are available to all residents online and several free classes exist. Engagement activities could reinforce existing programs as well as offer additional engagement helping property owners and homeowner associations understand the importance of clearing stormwater infrastructure of debris.

Policies and Strategies to Improve Adaptive Capacity

A policy audit of city and regional plans contained several explicit policies related to Waste Management. A majority of the policies address the holistic cycle of consumption and production as well as providing opportunities to reduce emissions at the consumer level from landfilled waste.

Additional waste management policies should address weather related debris management, continued service delivery, and ensured system redundancy during a climate emergency.

A broad policy could address emergency responses and services:

- Disaster Recovery and Emergency Response: Develop plans and resources to ensure effective emergency response and equal access to emergency services and recovery resources, mitigating risks from natural disasters, climate-related hazards, and social hazards. (Policy 43)

A recommendation of the Adaptive Capacity Assessment called for this implementation action for Policy 43:

- Institutionalize climate vulnerability data into emergency response planning—including evacuation, debris management, and contingency protocols for essential services. (City of Vancouver, 2025)

Water Resources

Sector Overview and Assets

This section addresses Vancouver's water, wastewater, and stormwater systems relying on the City's system plans.

Water System

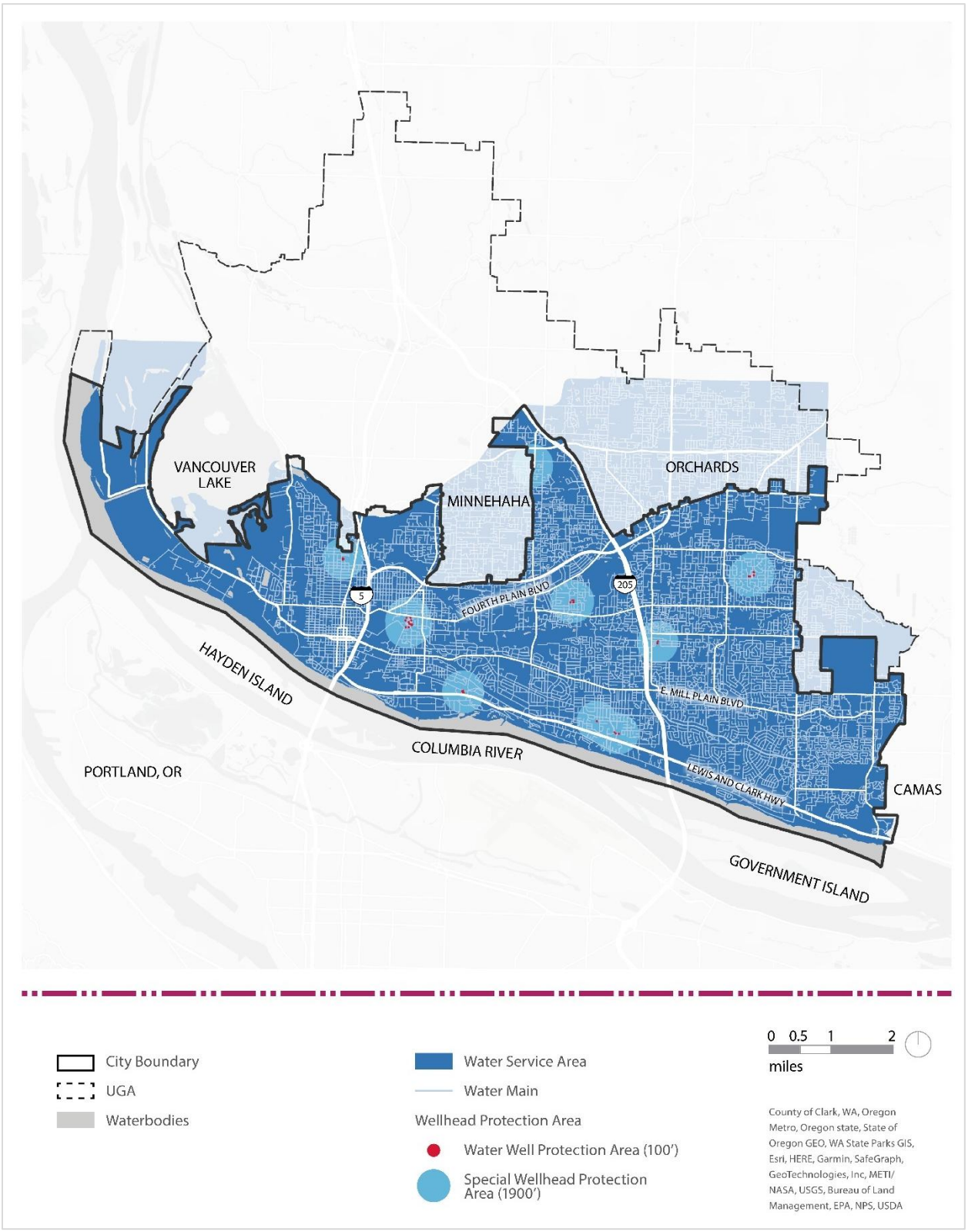
Vancouver provides water protection, treatment and management serving more than 270,000 people within the City and a portion of the urban unincorporated area, covering a 72-square-mile service area. See Exhibit 78. The system includes 9 water production stations, 40 wells, 52 booster pumps, more than 1,100 miles of pipes, and more than 77,000 service connections (water meters). (City of Vancouver, 2024)

Vancouver's water supply comes from underground aquifers under the city and county. It is a sole source aquifer called the Troutdale Aquifer System Area. (US EPA, 2024) Treated groundwater is stored in reservoirs and elevated tanks. Stored water is gravity fed or pumped to pressurize the distribution system. (City of Vancouver, 2015) The City protects groundwater through a wellhead protection program and limits activities that could contaminate critical aquifer recharge areas.

While groundwater is the primary source of water, watershed plans have recommended sourcing water from the Columbia River:

> *Vancouver has been active in the WRIAs 27 and 28 planning effort. The Salmon-Washougal and Lewis Watershed Management Plan (WRIA Plan) was adopted in 2006. The WRIA Plan addresses a range of issues related to water resources, including water supply, stream flow management, water quality, and fish habitat. It reviews alternative approaches for managing water resources in the area and recommends select strategies for implementation. The WRIA Plan discusses Vancouver's sources of supply and projected needs and identifies groundwater in the Vancouver Lake lowlands as a major new source of regional supply. Given this regional source of supply, the WRIA Plan recognizes that Vancouver's regional supply may play a role in assisting other communities within Clark County to meet future demand. The WRIA Plan also encourages new developments and industrial facilities to rely on the City's existing public water system. (City of Vancouver, 2015)*

Exhibit 78: Vancouver Water System



Source: (Design Workshop, 2024)

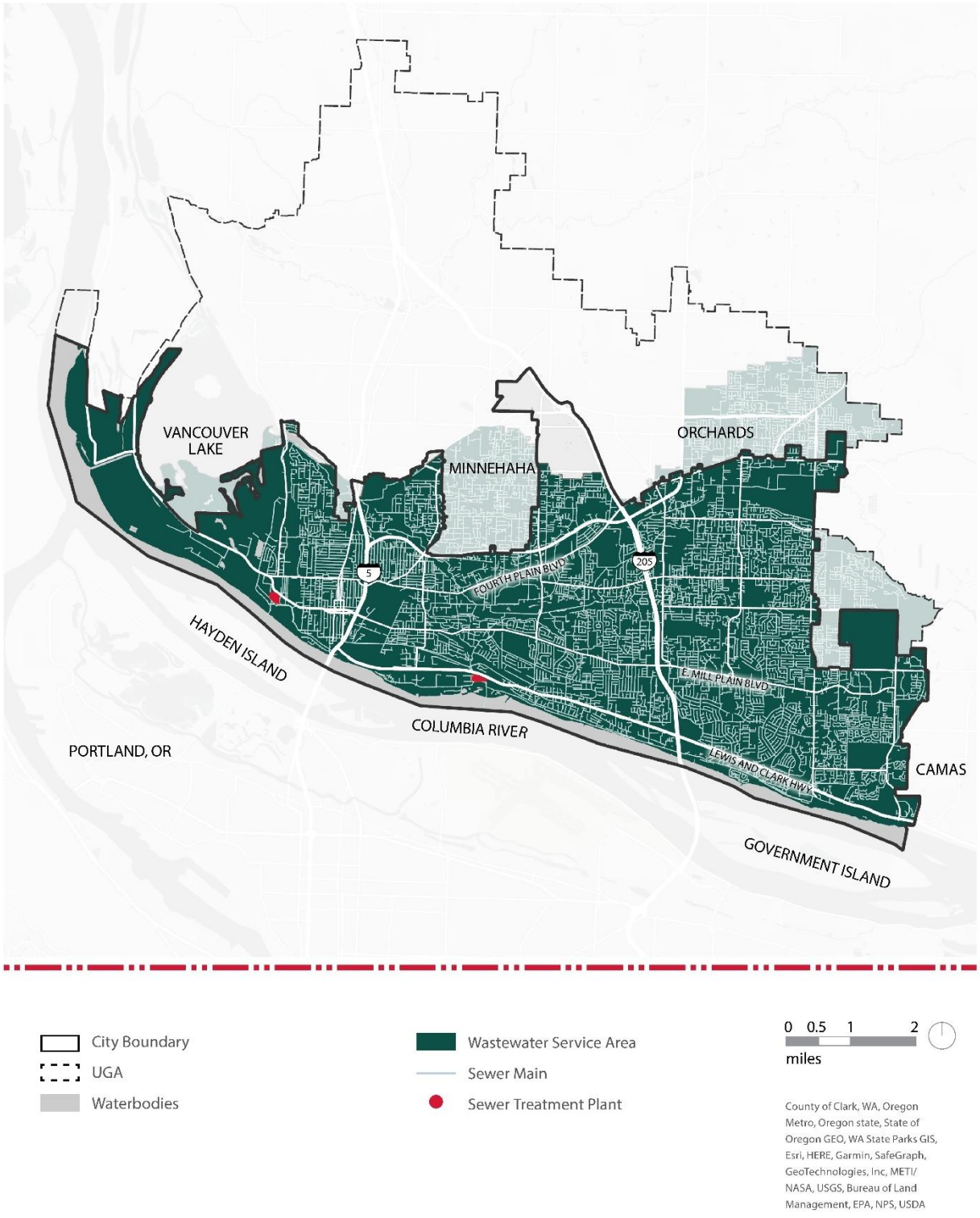
Vancouver's Water System Plan also considers watershed plan recommendations and state rules that identify subbasin closures to additional ground or surface water withdrawals:

> *The City is located in the Burnt Bridge Creek subbasin. Portions of the service area and UGA are located in the Salmon Creek and Lacamas Creek subbasins. Instream flows have been set in each of the City's three subbasins. The subbasins have been closed to further surface water and groundwater withdrawals, except limited situations provided in WAC 173-528-080 and the designated "regional supply areas." The Vancouver Lake Lowlands Area has been designated a "regional supply area." The City has a small (0.2 cfs) reservation of water in Burnt Bridge creek for future use. (City of Vancouver, 2015)*

Wastewater System

Vancouver provides a wastewater collection system serving 244,000 residents in a 58.6 square mile area, with 791 miles of sewer lines and 48 pump stations. See Exhibit 79. The City also has two wastewater treatment facilities. The City has partnered with the Clark Regional Wastewater District. Even with an extensive system some properties are still using septic systems and the City offers incentives to hook up to sewers with affordable financing, which can help improve water quality. (City of Vancouver, 2024) The Climate Action Framework calls for reducing per capita water usage and operate the wastewater treatment system more efficiently. (City of Vancouver, 2022)

Exhibit 79: Vancouver Wastewater System

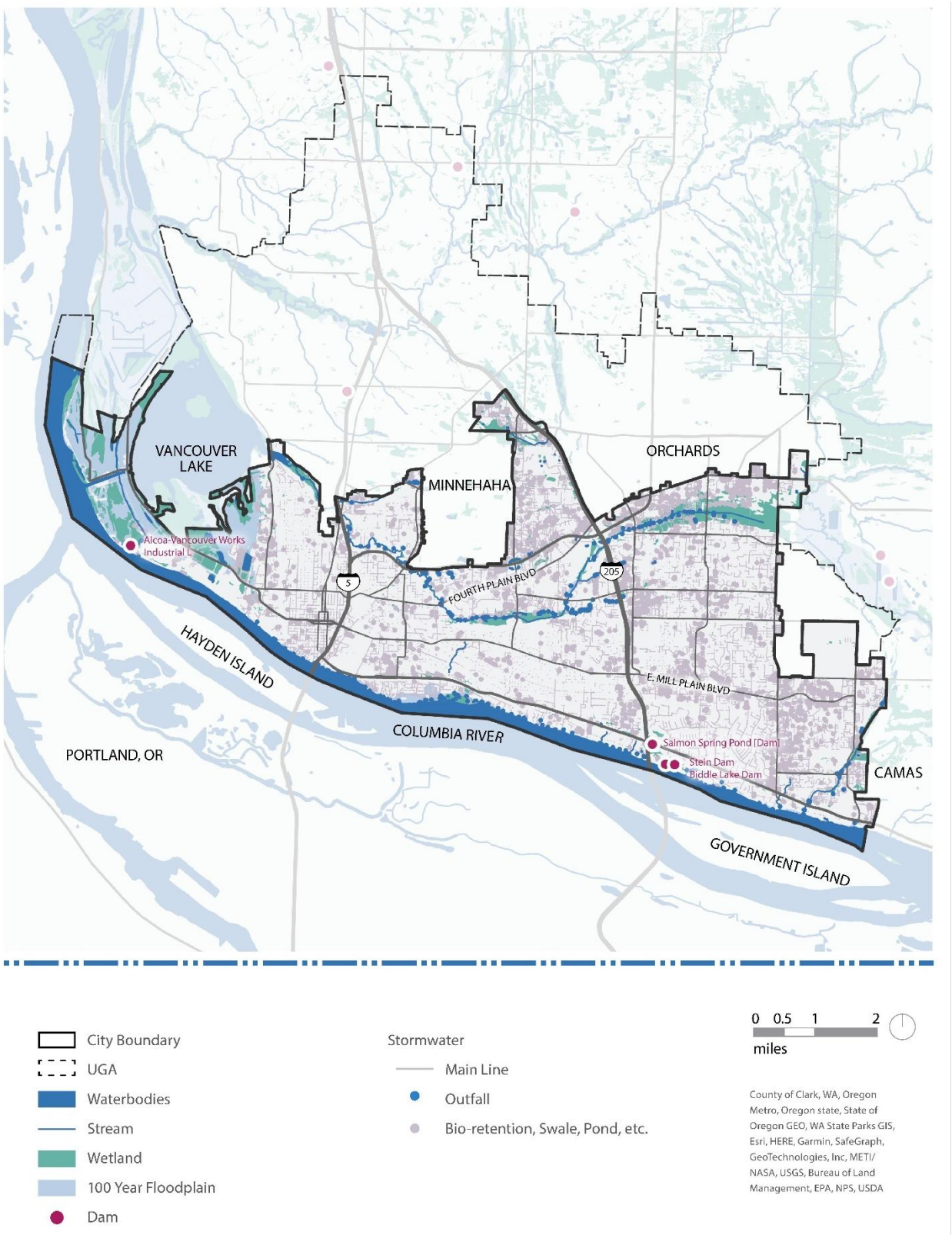


Source: (Design Workshop, 2024)

Stormwater System

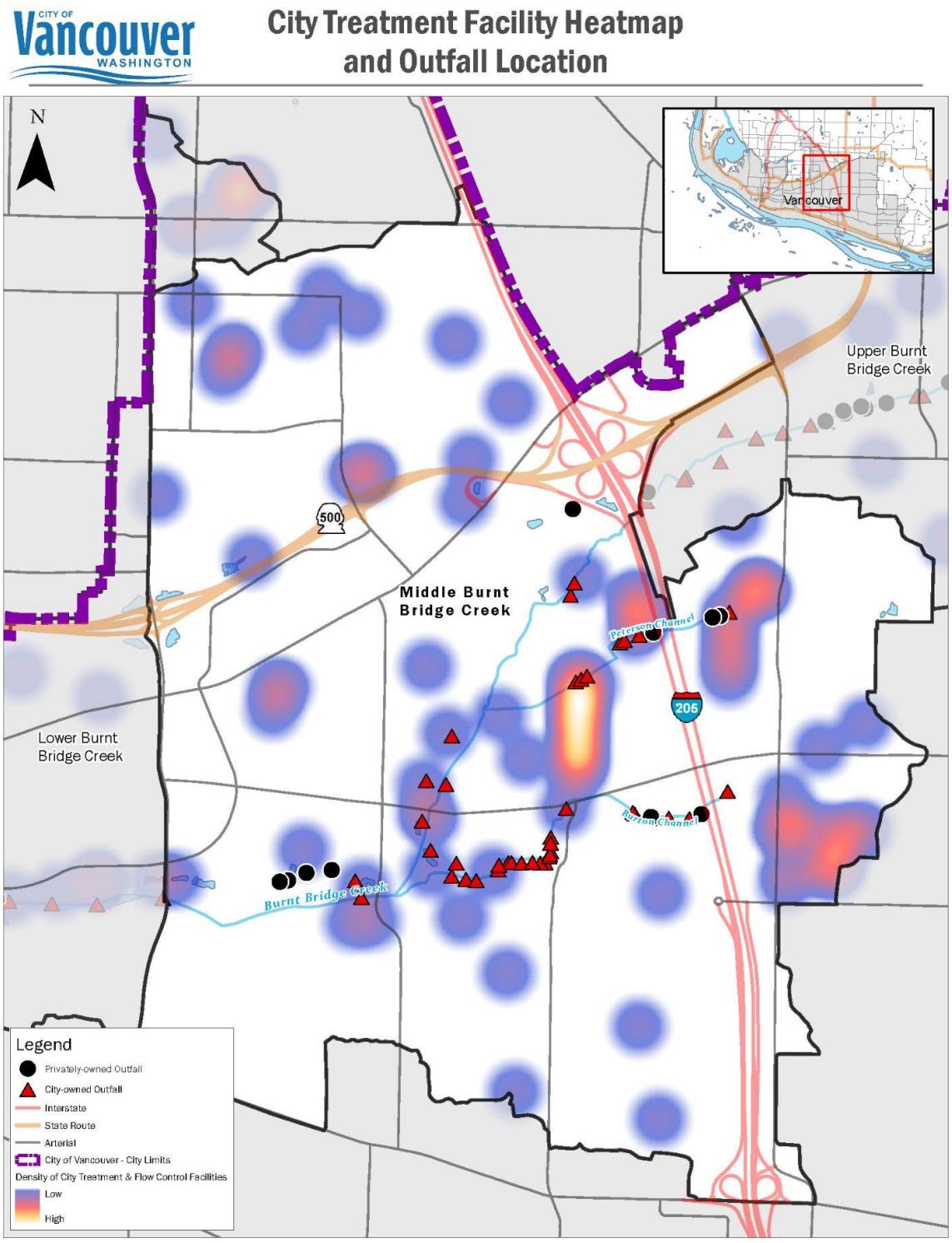
The City has a Stormwater, Surface Water and Groundwater Utility. Vancouver has 400 miles of stormwater pipelines and 16,000 catch stormwater drains. See Exhibit 80. The City manages both natural and built stormwater systems to manage water quantity and quality and avoid non-point pollution and unmanaged runoff. (City of Vancouver, 2024) The City applies stormwater rules to new development and prioritizes low impact development best management practices. The City has identified some priorities in a Stormwater Management Action Plan in 2023 for Middle Burnt Bridge Creek, with a goal of lower stream temperature, increase dissolved oxygen and reduce bacteria. (City of Vancouver, 2024) (City of Vancouver, 2023) The Climate Action Framework promotes stormwater infiltration and rainwater reuse. (City of Vancouver, 2022)

Exhibit 80: Stormwater System



Source: (Design Workshop, 2024)

Exhibit 81: Priority Stormwater Management Action Plan Sub-basin



Source: (City of Vancouver, 2023)

Potential Impacts

Drought

There has been a persistent drought since 2019, easing in 2023, but in 2024 a statewide drought was declared. (Bumbaco, 2024) This drought applies in Clark County and nearly the entire state except for parts of King, Pierce, and Snohomish County. (Washington Department of Ecology, 2024)

The University of Washington Climate Impacts Group has summarized potential impacts due to changes in annual and late summer precipitation associated with extreme precipitation and drought:

- Changes in the timing and intensity of precipitation and increases in water demand and evaporation could offset increases in groundwater recharge due to more annual precipitation.
- Less summer precipitation is expected to contribute to summer water shortages for commercial and residential uses. Water quality may also decrease with less summer input and associated warmer water temperatures.
- More frequent and severe droughts due to low summer precipitation have the potential to increase voluntary or mandatory conservation requirements and water use restrictions.
- Less streamflow in the warm season is expected to increase dependence on stored water and reduce water available for residential and commercial uses.
- Warmer temperatures are expected to increase water demand and energy demand for cooling. (Raymond, 2022)

Wildfire

Wildfire risk is relatively limited in Vancouver per the *Hazard Mitigation Plan*. (Clark Regional Emergency Services Agency, 2023) Climate change mapping shows a relatively greater probability in western and central Vancouver and less in the east or north. A potential impact of increased wildfire likelihood could affect water resources such as:

- More frequent wildfires have the potential to damage water distribution infrastructure and reduce water quality in reservoirs due to more runoff, erosion, and turbidity. Changes in water quality could increase the need for water treatment and filtration. (Raymond, 2022)

Extreme Precipitation and Flooding

There would be increased demand on stormwater management systems. The *Natural Hazard Mitigation Plan* indicates that there are several areas in Vancouver already experiencing

shallow flooding. Areas already experiencing urban flooding could have more frequent or severe flooding with extreme precipitation events.

> *There are a number of areas in the community that experience seasonal, shallow urban flooding during prolonged periods of high precipitation. This can impact mobility as well as threaten life and property. Drainage and/or infiltration structures and pipes may become blocked by excess water, debris, sediment, landslides, or volcanic ash. Hazardous material spills may move off-site and contaminate downstream locations if not property managed. (Clark Regional Emergency Services Agency, 2023)*

Locations identified as having riverine and urban flooding concerns were identified in the 2025 Adaptive Capacity Assessment and 2025 Resilience Rising engagement.

Exhibit 82: Flooding and Drainage Concern Areas

Location	Description of Urban Flooding
Wastewater Treatment Plant	Potentially vulnerable to riverine flooding from the Columbia River (ACA p. 31).
Fruit Valley and Fourth Plain	Locations facing barriers to climate-adaptive transportation and cooling access (ACA p. 39). Fruit Valley residents described frequent flooding and clogged storm drains (Resilience Rising, p. 5)
Fourth Plain BRT Line	On the Fourth Plain BRT line, which runs through some older, low-lying neighborhoods, chronic street flooding has already been noted at certain intersections – these incidents are likely to worsen with climate change. (ACA, p. 8)
Burnt Bridge Creek Watershed and Locations along Fourth Plain and Hwy 99	Flood-prone areas in Vancouver include low-lying neighborhoods along creeks (like parts of the Burnt Bridge Creek watershed), areas with high groundwater, and pockets with poor drainage (such as some intersections along Fourth Plain or Hwy 99 that flood in big storms). (ACA, p. 22) Also cited as an area of water quality concern and potential risk for library branches located near it (pp. 12, 15, 30). City has developed a Stormwater Management Action Plan (SMAP) for Burnt Bridge Creek. (ACA, p. 22)
Areas with High Groundwater	A contributing factor to stormwater challenges, though not tied to a specific location (ACA, p. 31).

Sources: Adaptive Capacity Assessment (ACA), Resilience Rising, City of Vancouver 2025

Adaptive Capacity

The City has a 2016 water system plan amended in 2022, and the City anticipates updating it by 2026. The current water system plan does not address climate change projections and anticipates it would occur in the next update. HB 1181 requires water system plans to address climate resilience in updates after 2025.

> *No changes to demand projections were made for the 20-year planning period to account for potential climate change due to the uncertain magnitude and timing of local effects, and the difficulty in correlating historical climate and demand data. It is recognized that demands have the potential to increase in the future given anticipated climate changes. The City may want to develop a model to better track demands with temperature and rainfall for future demand planning. Additionally, it may be beneficial for the City to participate in regional climactic studies to qualify and quantify potential local climate impacts. (City of Vancouver, 2015)*

Increased stormwater and precipitation events could adversely affect septic systems not yet connected to the sewer system and impact water quality. Extreme precipitation could also impact wastewater treatment facilities (overflow).

The City has stormwater plans and regulations in place and regularly updates them to meet federal requirements (NPDES). Standards for new stormwater facilities sized to address extreme precipitation have not been developed. The 2025 Adaptive Capacity Assessment has proposed a strategy to expand the capacity of stormwater systems including updated rainfall intensity forecasts and to design for projected storms rather than historic storms. (City of Vancouver, 2025)

Vulnerability Summary

A summary of vulnerability for water resources is provided in Exhibit 82 and Exhibit 83 below. It is largely driven by flooding exposure and stormwater quality affecting vulnerable communities.

Exhibit 83: Vulnerability by Census Tracts – Water Resources

Census Tracts	Area	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index	SMAP
53011042300	2	Medium-high	Medium-high	Medium-high	Higher	Higher	Medium-high	

Census Tracts	Area	Heat Exposure	Flooding/ Precipitation Exposure	Smoke/Air Quality Exposure	Overall Exposure	Health Conditions	Equity Index	SMAP
53011042400	2	Higher	Higher	Higher	Higher	Higher	Higher	
53011041111	3b	Medium	Medium-high	Medium-high	Medium-high	Higher	Higher	
53011041113	3b	Higher	Medium-high	Medium-low	Medium-high	Higher	Higher	X
53011041114	3b	Medium	Medium-high	Lower	Medium-high	Higher	Higher	X
53011041600	4	Medium-high	Higher	Medium	Higher	Higher	Higher	
53011041700	4	Medium	Medium-high	Medium-high	Medium	Higher	Medium-high	
53011042700	4	Medium-high	Higher	Medium-high	Higher	Higher	Higher	
53011041205	6	Medium-high	Higher	Medium-high	Higher	Medium-high	Higher	X
53011041312	7	Higher	Higher	Medium	Higher	Medium-high	Higher	
53011041313	7	Medium-high	Medium-high	Medium	Medium-high	Medium-high	Higher	X
53011041320	8	Medium-high	Medium-high	Medium-high	Higher	Medium-high	Medium-high	
53011041322	8	Higher	Higher	Higher	Higher	Medium-high	Higher	
53011041323	8	Higher	Higher	Higher	Higher	Medium-high	Higher	
53011041329	8	Medium-high	Higher	Higher	Higher	Lower	Medium-high	

Source: See Chapter 2 for indicators and methods. BERK, 2025.

Higher Exposure + Higher Health & Equity Disparities | Stormwater Management Action Plan (SMAP) Priority Area

Exhibit 84: Risk Summary – Water Resources



Sources: BERK, 2025.

Gaps and Opportunities

Engagement and Strategies to Improve Adaptive Capacity

Through an interdepartmental engagement effort in an Adaptive Capacity Assessment and a community engagement process through Resilience Rising, a number of adaptive capacity strategies were developed:

- Fortify the wastewater treatment plant against flooding from both river rises and surface runoff. Enhance the wastewater treatment plant's (WWTP's) capacity and

flexibility to handle more variable flows and conditions. Guarantee an uninterruptible power supply for the WWTP. (City of Vancouver, 2025)

- Mitigate the risk of heavy rain overwhelming the WWTP by reducing how much stormwater gets into the sanitary sewers in the first place. This means continuing programs to detect and fix sewer leaks (lining or replacing old sewer pipes that crack and let groundwater in) and disconnect improper storm drain connections. (City of Vancouver, 2025)
- Have robust alert systems for neighborhoods around the WWTP and downstream along the river – if there's an unplanned discharge or issue. (City of Vancouver, 2025)
- Expand Capacity of Stormwater Systems: Upgrade the stormwater mains, culverts, and channels to accommodate larger storm events. This involves identifying the key bottlenecks in the system – e.g., a culvert under a road that frequently overtops, or a stretch of pipe that causes backups – and upsizing them. Use updated rainfall intensity forecasts (taking into account climate change) to set new design standards. (City of Vancouver, 2025)
- Green Infrastructure and Infiltration: Reduce the burden on piped systems by capturing runoff naturally at the source. Expand use of green infrastructure such as bioswales, rain gardens, permeable pavements, and green roofs across the city. (City of Vancouver, 2025)
- Increase inspection and maintenance of the stormwater system to ensure it functions at peak capacity when storms hit. (City of Vancouver, 2025)
- Use land use planning to improve stormwater outcomes. Preserve and restore natural floodplains and wetlands that can act as safety valves for floodwaters. (City of Vancouver, 2025)
- Explore advanced solutions like smart stormwater management technologies. (City of Vancouver, 2025)

The pending water system plan update due in 2026 will be an opportunity to engage residents and business owners in the integration of climate resilience into the plan. Ongoing watershed planning unit participation will dovetail water supply needs with watershed protection.

Interdepartmental and public engagement to further identify areas currently experiencing or at risk of urban flooding could help stormwater adaptation efforts.

A relatively large number of septic systems continue to be mapped by Clark County GIS in Vancouver's city limits. Integrating Clark County Public Health into engagement efforts could help support clean water and septic system decommissioning and link Vancouver's wastewater system implementation efforts with public health.

Policies

Based on a policy evaluation, some areas identified to improve policies include:

- Amending existing water quality policies or add a new one to address climate related impacts to water quality and adaptation.
- Amending stormwater system policies to add need to address climate change impacts, e.g., vegetation type, facility sizing, etc.
- Addressing how improvements to utilities to address climate change (e.g., enhanced energy efficiencies with wastewater treatment, use of renewable fuels) will be addressed in rates considering overburdened communities.

The **OUR VANCOUVER 2045** plan addresses water quality, stormwater systems, and renewable energy:

- Stormwater Management: Improve water quality, protect watersheds and reduce flood risks by promoting groundwater infiltration, reducing runoff, and advancing effective stormwater best management practices. (Policy 136)
- Support the Use of Renewable Energy: Encourage new renewable energy infrastructure and promote development of storage systems to ensure a stable, resilient, and sustainable energy grid. (Policy 151)

Zoning & Development

The Zoning & Development sector addresses Vancouver's urban design including land use and design. This section reviews Vancouver's:

- Land Use Plan & Zoning
- Shoreline Master Program
- Transportation system plan
- Urban forestry program
- Draft Green Building Strategy

Sector Overview and Assets

Site Use and Zoning

Downtown is the central hub of Vancouver with a walkable historic core, hospitality, offices, and civic and institutional uses. Commercial corridors include Fourth Plain Blvd and East Mill Plain Blvd. The remainder of the community is largely zoned for single family development. Vancouver has a public waterfront designed for commercial and recreational purposes. Other shorelines host industrial businesses. See Exhibit 84 and Exhibit 85.

Exhibit 85: Example Development Character and Neighborhoods


Downtown


Uptown Village


Waterfront



East Vancouver

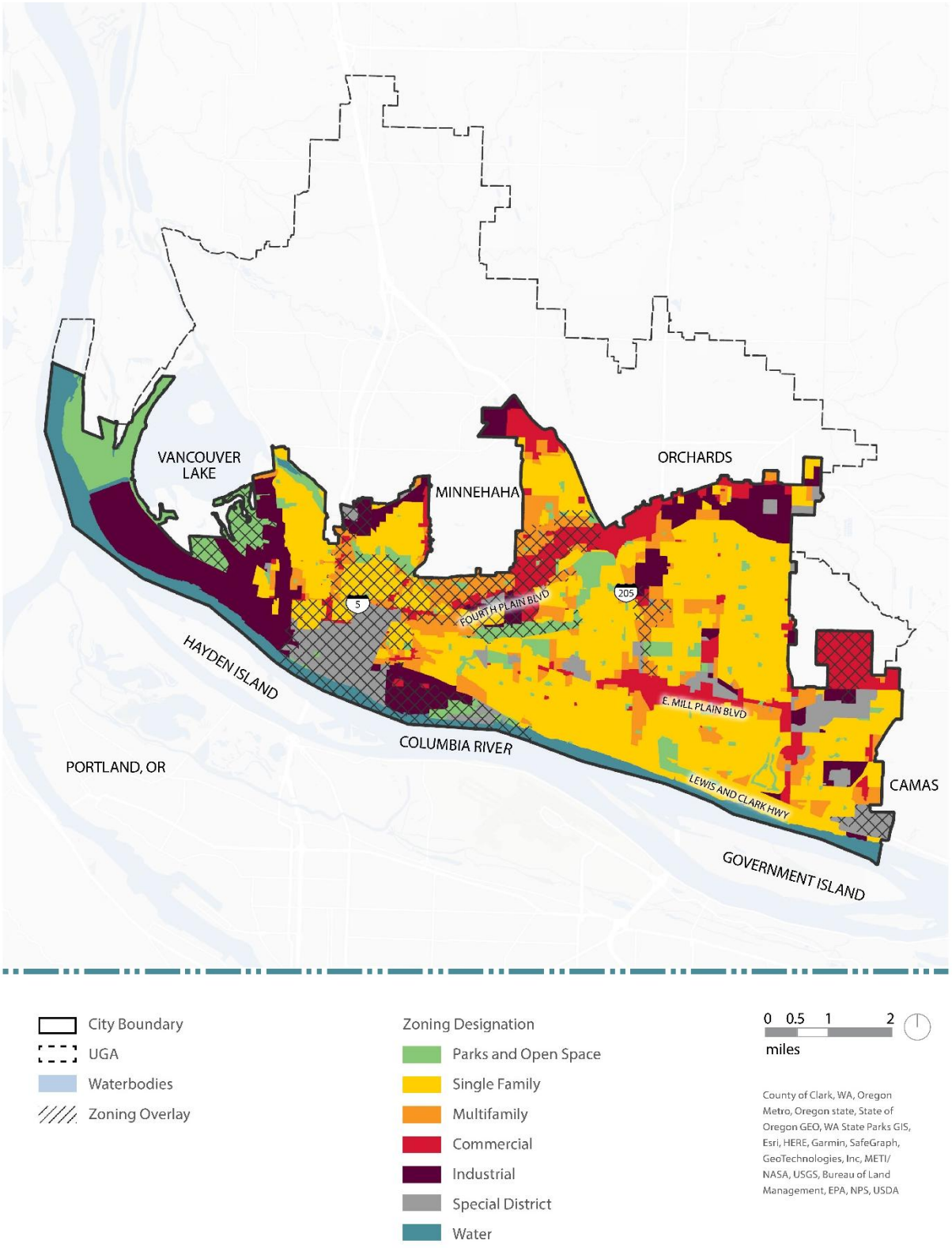


Fourth Plain


The Heights

Source; Visit Vancouver Washington, City of Vancouver, 2025.

Exhibit 86: Vancouver Zoning (2024)



Source: Design Workshop, 2024.

Vancouver has identified important centers and corridors in its Comprehensive Plan to provide for connected neighborhoods and accessible services. See Exhibit 86. The City is planning for more connected neighborhoods in its Comprehensive Plan Periodic Update.

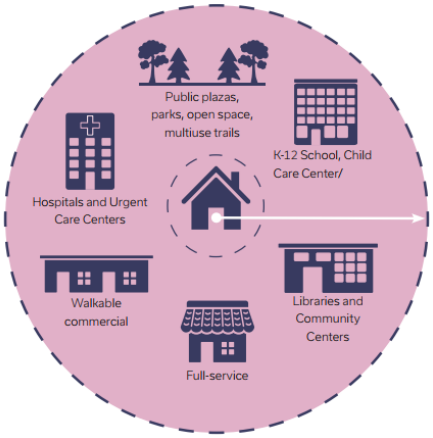
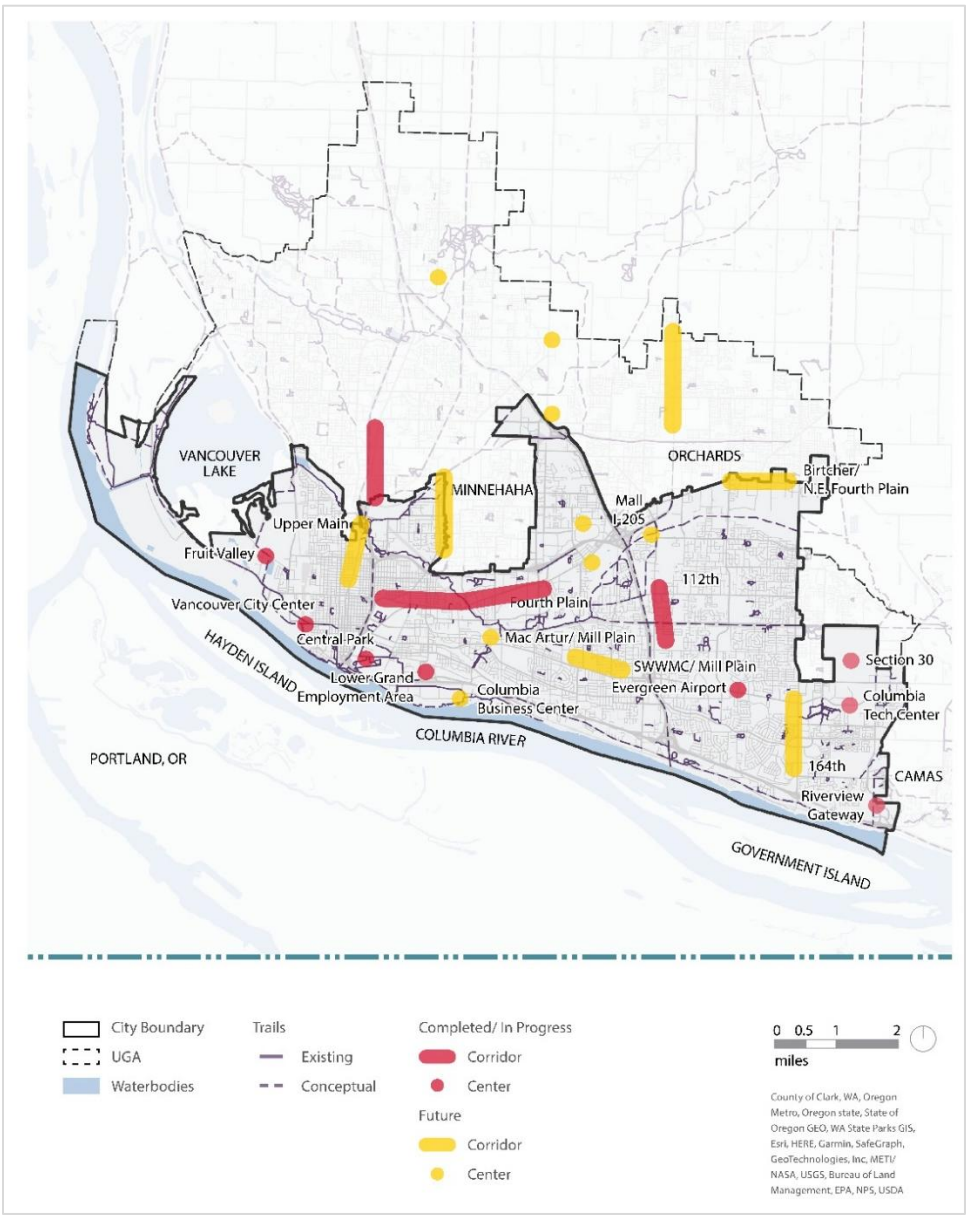


Exhibit 87: Centers & Corridors



(Design Workshop, 2024)

Public Realm

The public realm includes public streets, parks, and civic spaces where the public has access or can gather.

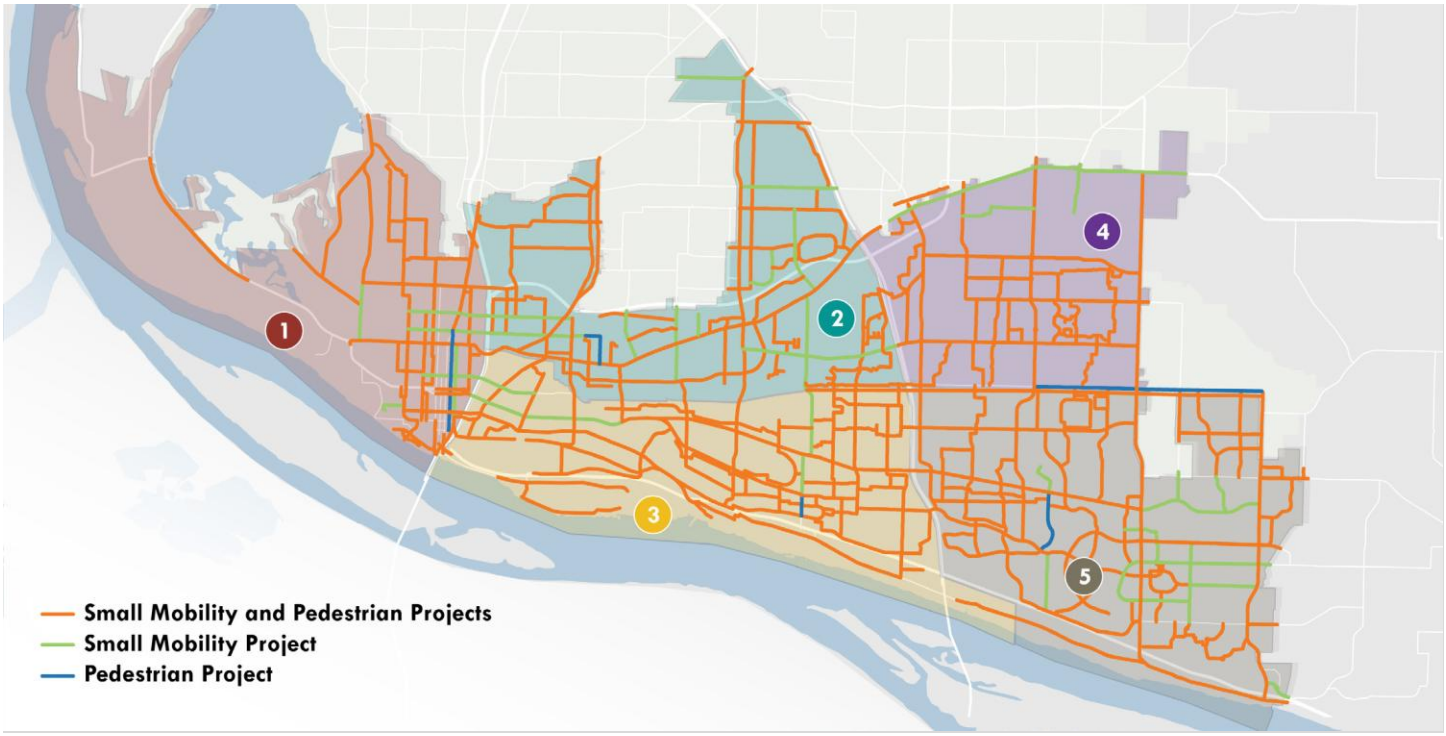
Parks

Vancouver contains parks and natural areas largely around waterbodies and shorelines. The City's Parks, Recreation, and Cultural Services plan (City of Vancouver, 2022) identifies a need for 1,200 acres of park land with over 800 acres developed to serve the population through the year 2031. Service standards also consider a ½-mile park service area of all neighborhood and community parks. Parts of Areas 1, 2, 3B, and 8 are identified as having a gap in community or neighborhood parks.

Transportation

The City developed a Transportation System Plan in 2023 that includes a number of mobility improvements including infill pedestrian projects, which would improve the public realm and make for a more walkable city. Each area is identified with priority projects.

Exhibit 88: Mobility and Pedestrian Improvements

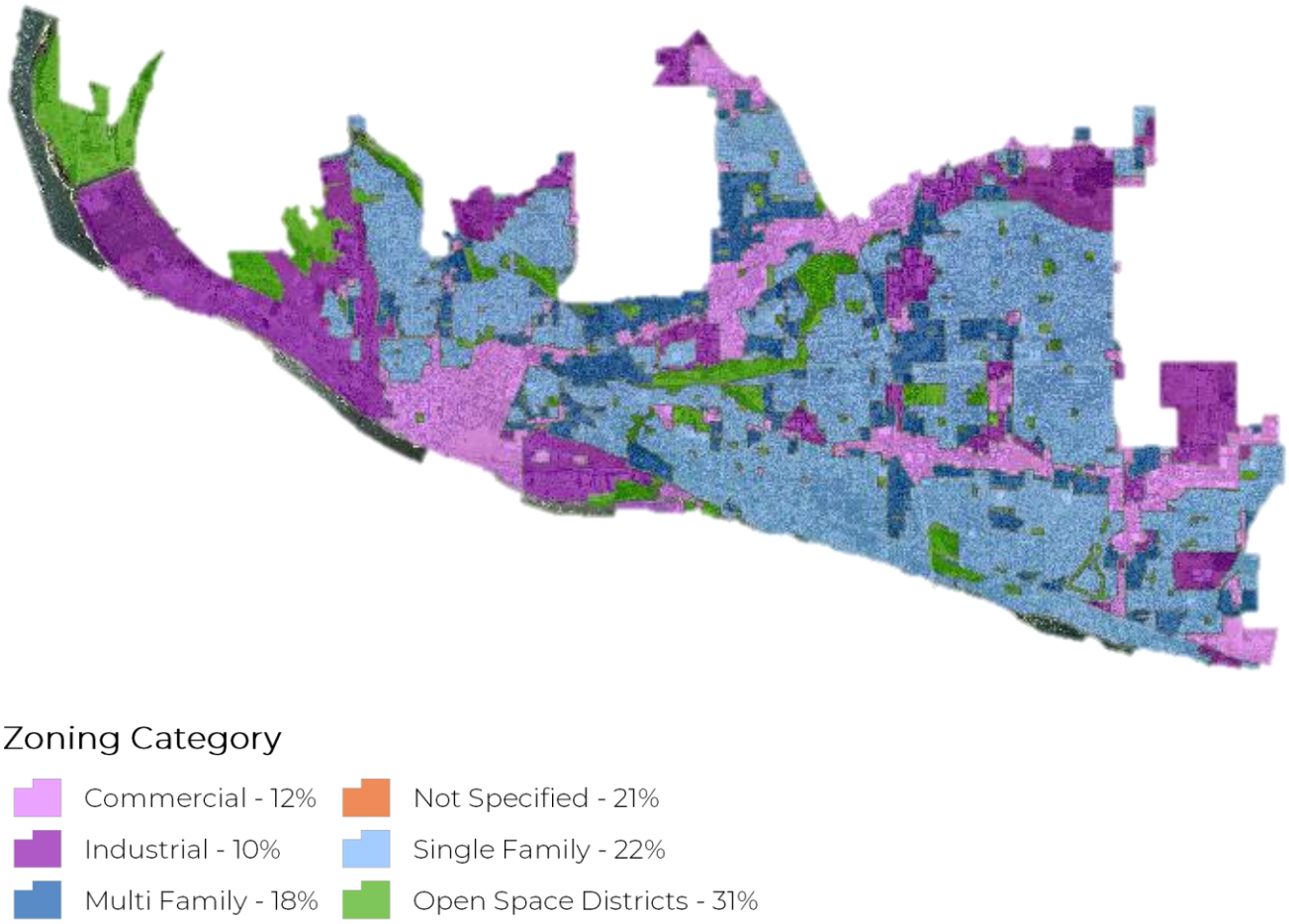


Source: (City of Vancouver, 2023)

Urban Forest

To maintain and enhance the urban environment, the City has an Urban Forest Management Plan that seeks to achieve a 28% citywide canopy goal. To achieve it the City would need to plant 3,000 acres of new canopy cover by 2047. That is an increase from today's canopy of about 18.9%.

Exhibit 89: Urban tree canopy in Vancouver by zoning (2021)

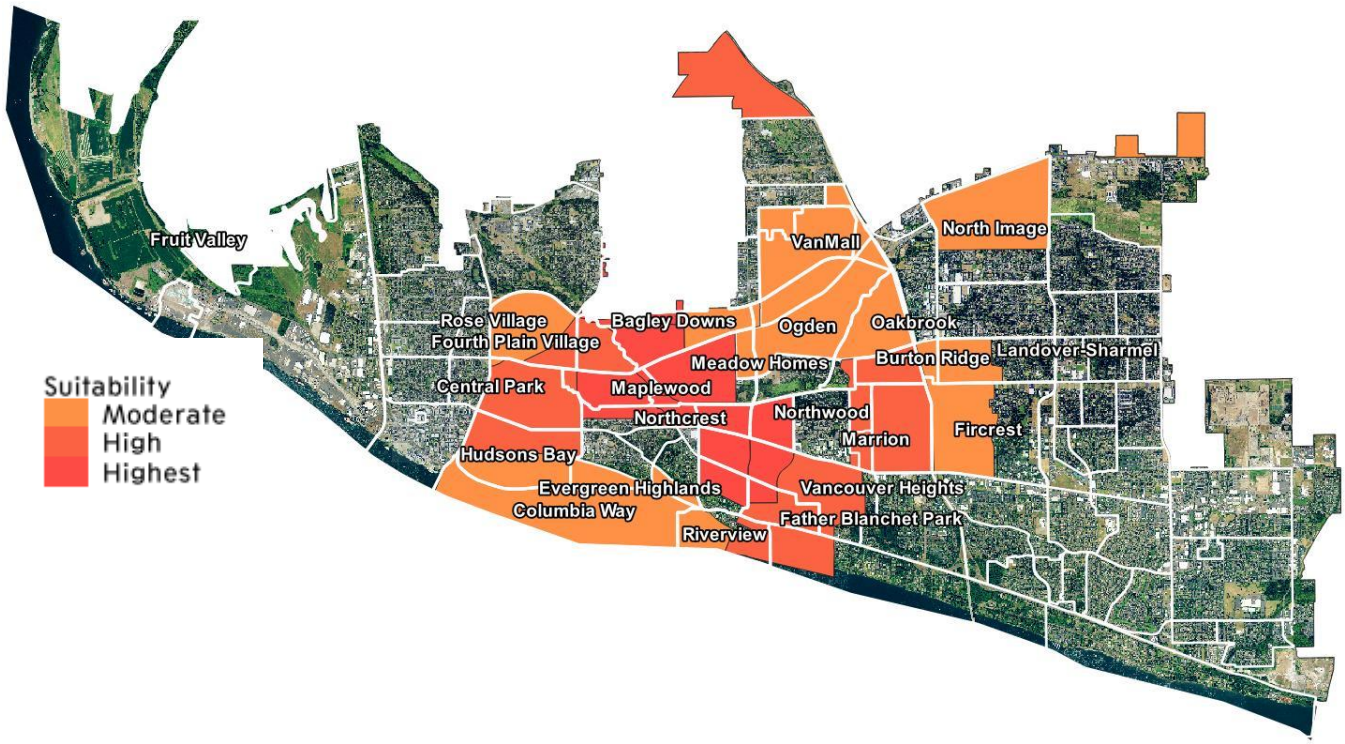


Vancouver's canopy goals for zoning: Industrial properties= 9%, Commercial properties=15%; Residential properties = 33%.

Source: (PlanIT Geo, LLC, 2021)

Priority tree planning areas are proposed in areas 2, 3b, 4, 6, and 7. See Exhibit 89.

Exhibit 90: Composite Map of Priority Planting Areas to Achieve Canopy Goals and Tree Equity



Source: (City of Vancouver, 2023)

Shoreline Master Program and Critical Areas

Vancouver has adopted a Shoreline Master Program (SMP) which promotes water oriented uses like ports, shoreline public access and enjoyment, and ecological protection and restoration. The SMP provides for shoreline uses, and buffers to protect sensitive environments and promotes soft shoreline alterations rather than hard structures. See Exhibit 90.

Vancouver also protects critical areas across the city such as wetlands, fish and wildlife habitat conservation areas, critical aquifer protection areas, flood hazard areas, and geologic hazard areas.

Exhibit 91: Shoreline Master Program, Shoreline Environments



Source: (City of Vancouver, 2021), WSP 2024.

Potential Impacts

Urban places can exacerbate climate impacts because they tend to have greater impervious areas with taller buildings and pavement, less trees, and altered natural systems. Greater buildings and pavement can exacerbate flooding, magnify urban temperatures, compromise indoor air quality, increase exposure to allergens, and increase energy demand. (See sidebar and Exhibit 91.)

Vacant and redevelopable lands (5,583 acres) will add capacity for housing and jobs in the next 20+ years. Larger areas of development include the port, Section 30, and a number of commercial mixed-use areas. This could add imperious areas, but there are also opportunities to add green and blue infrastructure. (Design Workshop, 2024)

Black and Hispanic/Latino residents are less likely to be homeowners in Vancouver. (ECOnorthwest , 2024) Single-family zones have a greater percentage of tree canopy than in multifamily or commercial zones. (PlanIT Geo, LLC, 2021) Those with lower incomes tend to live in areas with less tree canopy and more pavement, near high traffic volume roadways, and in housing that may be older and with less modern HVAC and filtration systems.

Air pollution already generated by transportation and industry could be exacerbated by extreme heat such as ozone and by drought and wildfire smoke (PM 2.5). (US EPA, 2024) (West, Ch. 14. Air quality. In: Fifth National Climate Assessment. Crimmins, A.R.,, 2023)

Climate Change: Built Environment, Urban Systems and Cities

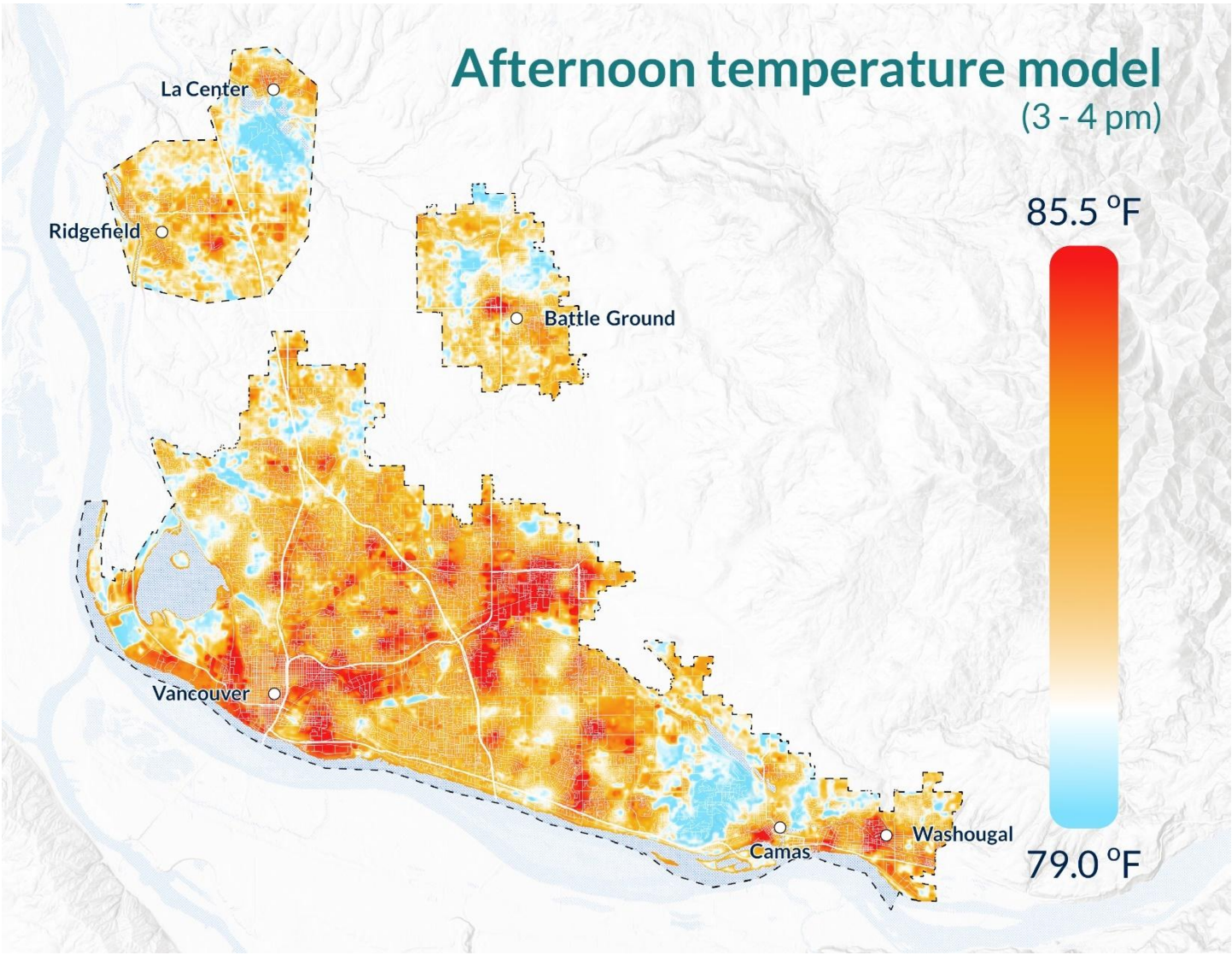
Urban development patterns significantly influence local and regional environments, and these patterns can exacerbate the local effects of climate change. Depending on the type of built environment, both urban growth and land-use change have impacted and will continue to impact surface and ambient air temperature, local and regional humidity, wind patterns, precipitation, flooding, and dispersion of air pollutants...

Changes in design, form, and mass of buildings and configurations of streets, open green spaces, and water features—as well as their interactions—have direct effects on urban temperature and energy demand... Nighttime air temperatures, in particular, are expected to be higher across many urban areas due to radiant heat and heat conductance from buildings...

Exclusionary housing practices—which persist today—leave overburdened communities with lower access to heat-reduction strategies such as urban trees and green space, as well as to broader economic and social resources...

Another example of the uneven impact of climate change on the built environment is the deteriorating indoor air quality experienced by people living in neighborhoods with substandard housing. This includes exposure to allergens such as mold and dust and pollutants such as carbon dioxide and nitrogen dioxide. In wildfire-prone regions, indoor air quality is additionally compromised by smoke. There are also potential negative mental health outcomes from decreases in social interaction and physical activity when people are confined indoors to avoid temperature extremes. ... (Chu, 2023)

Exhibit 92: Urban Heat Islands – Clark County Public Health Heat Watch



Heat Watch data was collected on July 12, 2024, during a one-day event organized by Clark County Public Health with the support of more than 50 volunteers, local government partners and technical assistance from CAPA Strategies.

Source: (Clark County Public Health, 2024)

Vancouver's public parks, trails, and open spaces provide trees and green spaces that help cool the city, but extreme heat can make parks uncomfortable or even unsafe during heatwaves, especially those parks with large open turf or concrete and minimal shade. Wildfire smoke can interfere with outdoor activities. Many parks are intentionally located in low-lying areas to recognize floodplain and wetland functions and values, but then the parks would flood more frequently and severely as precipitation extremes intensify. (City of Vancouver, 2025)

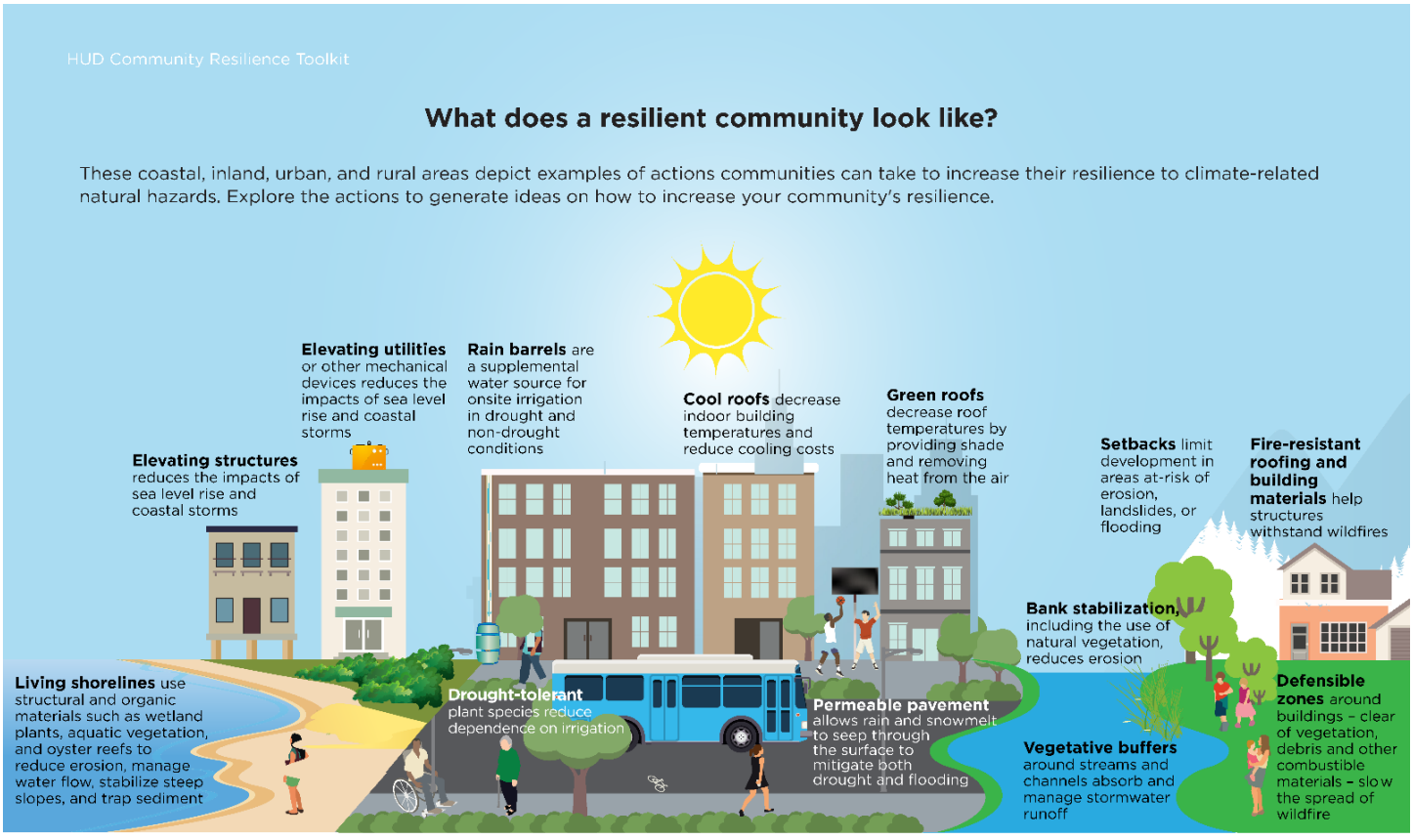
Adaptive Capacity

The creation of a resilient community is holistic. Important urban design elements include:

- Environmental conservation and protection like living shorelines and vegetative buffers.
- Protecting existing infrastructure in floodplains such as elevating structures and utilities.
- Green and blue infrastructure like rain barrels, cool roofs, green roofs, and permeable pavement.
- Greenspace with drought-tolerant species and tree canopy.
- Defensible zones and fire-resistant construction.
- Encouraging mobility that reduces greenhouse gas emissions but also provides redundant access to homes, services, and employment.
- Increasing the supply of affordable energy-efficient housing.

See Exhibit 92 for a diagram of many of these resilient community elements.

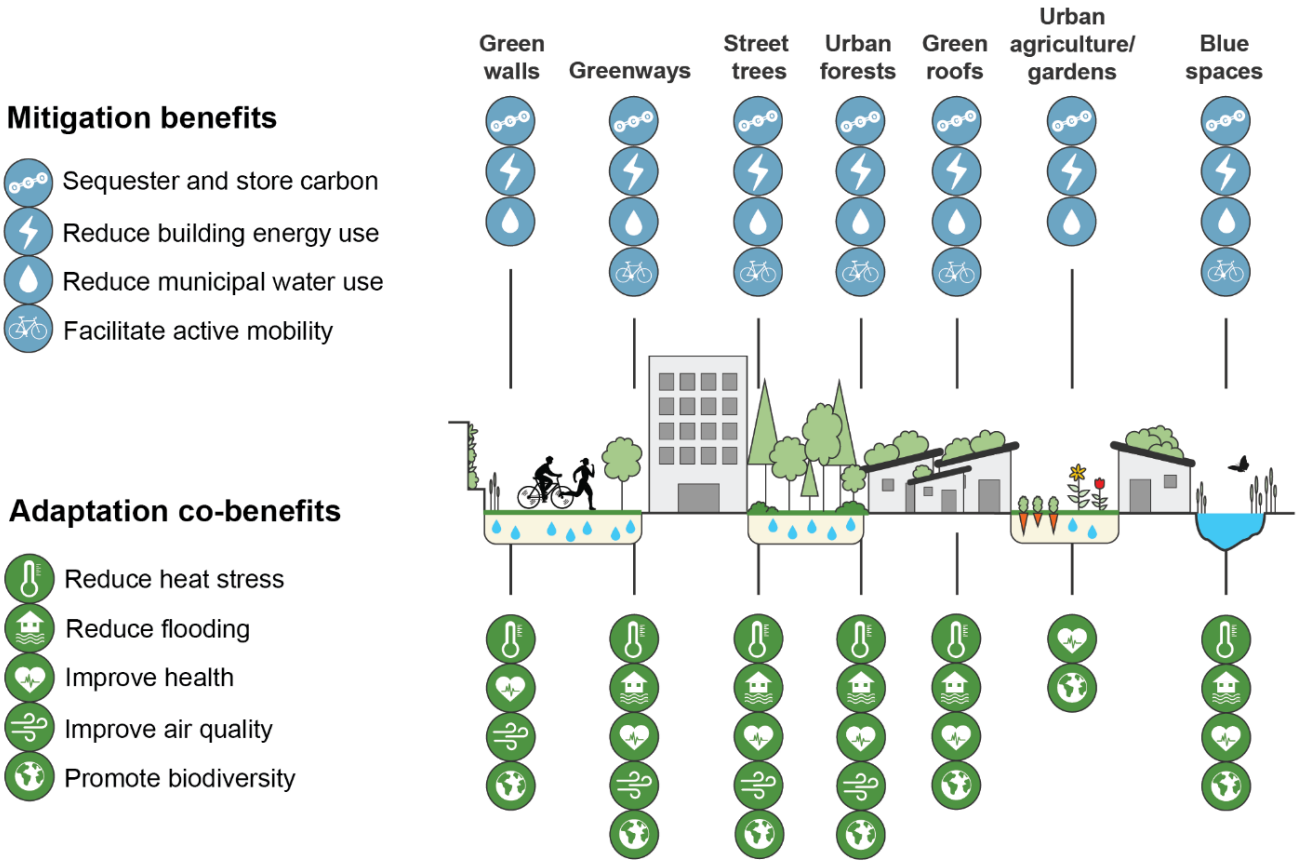
Exhibit 93: What does a resilient community look like?



Source: (U.S. Department of Housing and Urban Development, 2017)

Natural infrastructure – including green and blue elements applied to buildings and landscapes – has both mitigation and adaptation benefits. See Exhibit 93.

Exhibit 94: Natural infrastructure in cities provides climate mitigation and adaptation benefits



CAPTION: The figure illustrates the potential benefits (in no particular order) of integrating natural infrastructure strategies—also termed green, blue, or nature-based solutions—within the built environment. Nature-based, green, and blue infrastructure options are strategically planned interconnected sets of natural and constructed ecosystems, spaces with vegetation or waterscapes, and other landscape features that provide important GHG mitigation and climate adaptation functions, as well as improve human well-being, biodiversity, and ecosystem health. This figure shows examples of how urban forests and street trees can sequester and store carbon while simultaneously reducing building energy demand. Reducing municipal water use can provide a mitigation benefit by decreasing energy use in wastewater treatment plants. Lwasa et al. 2022) (Chu, 2023)

The City has programs underway that support many of these community resiliency measures:

- The City adopted a Stormwater Management Action Plan (City of Vancouver, 2023) to prioritize water quality treatments in the Middle Burnt Bridge Creek basin with impaired ecological conditions and with underserved and overburdened communities. There may be lessons learned with these basin improvement efforts that could apply to other locations in the city.
- Vancouver has an Urban Forest Management Plan to increase canopy to 28% by 2047. (City of Vancouver, 2023) Priority blocks are noted in Exhibit 89 to address tree equity.
- The City is implementing Middle Housing zoning to provide more homeownership opportunities for all incomes. This could increase opportunities for physical activity,

reduce greenhouse gases, and improve community connections through mixed use neighborhoods.

- The City's Transportation System Plan implementation would increase mobility and transit-oriented development connecting residents with amenities and employment.
- The City is developing a Draft Green Building Strategy which would ensure buildings have good indoor air quality and use better heating and cooling systems. The strategy would promote building designs that are safer for birds, using plants that need less water, and saving trees. The strategies would promote buildings that handle extreme weather by adding better insulation, keeping buildings cooler with shading or reflective materials, controlling energy use during busy times, and providing backup power for outages. (City of Vancouver, 2024)

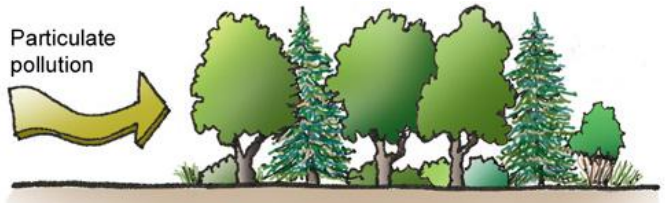
In the future the City could consider adopting wildland urban interface codes to ensure human and property safety. The State Building Code Council developed rules, but they are not in effect while the mapping and rules are under review for applicability and effectiveness. (Demkovich, 2024)

The City is completing a health impact assessment along with the Comprehensive Plan Update that could help address wildfire smoke exposure, as well as ongoing exposure from transportation sources. Addressing right of way treatments and abutting site and building design to reduce exposure to air pollution and noise due to high volume roadways could improve adaptive capacity both for day-to-day pollution exposures and increasing risks of climate change.

Example Studies and Approaches to Mitigating Air Pollution

Air Quality and Land Use Planning, 2023, Review of Literature by Bellevue, with Mitigation Strategies – land use (limiting sensitive uses), urban design, barriers/walls/vegetation, highway lids, building design and ventilation

USDA Air Quality and Conservation Buffers Manual to enhance visual quality, control noise levels, control air pollutants and odor



A 65 to 600 ft wide buffer may reduce particulate pollution by 40 to 75 percent although many factors will affect pollutant removal

Vulnerability Summary

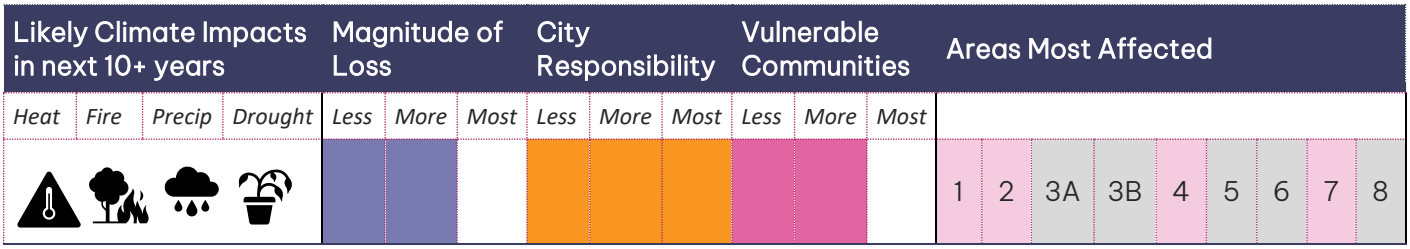
Vancouver is likely to be exposed to extreme heat in the planning period and has wide swaths of lands that have relatively lower tree canopy or implementation of adaptive building features (e.g., cool roofs, etc.) that can mitigate these risks. The City has a relatively small area subject to flooding often flanked by greenways (Burnt Bridge Creek) or with extensive flood control structures and with population densities relatively lower (Columbia River) but is subject to urban flooding that could experience extreme precipitation during the planning

period. The City has plans and priorities regarding where to address lacking tree canopy, as well as improving stormwater management, largely in central Vancouver.

Areas most vulnerable due to higher exposures and higher shares of communities with health sensitivities or equity disparities are identified in the Executive Summary in Exhibit 4 and Exhibit 5 and include Areas 1, 2, 4 and 7.

The widespread location of areas most vulnerable and the responsibility of the city to promote resilient urban design make zoning and development a higher risk and priority to address. See Exhibit 94.

Exhibit 95: Risk Summary – Zoning & Development



Source: BERK, 2025.

Gaps and Opportunities

Equitable Engagement and Strategies to Improve Adaptive Capacity

The City has engaged its interdepartmental team and community members to identify solutions addressing improved connectivity and parks in the public realm.

Example strategies include:

- Residents have identified community spaces they currently rely on or trust during extreme events (e.g., churches, schools, parks). (City of Vancouver, 2025)
- Promote other forms of green infrastructure, especially in places suffering from extreme heat. Prioritize investment in areas that have lower property values. Green infrastructure investments should be coordinated with affordable housing and other policies to avoid impacts of green gentrification and related displacement. (City of Vancouver, 2025)
- Implement land use planning policies for flood mitigation. (City of Vancouver, 2025)
- Increase Shade and Tree Canopy at park by planting more trees and preserving mature ones to create extensive shade. (City of Vancouver, 2025)
- Add Water Features and Cooling Elements. Incorporate cooling water features in park design to help people cool off. Splash pads, interactive fountains, or misting stations. (City of Vancouver, 2025)

- Heat-Resilient Landscaping: Adapt park landscaping and maintenance practices to withstand hotter, drier summers with less water. (City of Vancouver, 2025)
- Leverage parks as part of overall community stormwater management. (City of Vancouver, 2025)
- For parks at the wildland-urban interface or with significant natural wooded areas, implement fire management strategies. (City of Vancouver, 2025)
- Involve the community in making parks climate resilient and prioritize improvements in the parks that serve the most vulnerable populations. (City of Vancouver, 2025)
- Make physical upgrades to trails to better withstand heavy rain, flooding, and erosion. (City of Vancouver, 2025)
- Increase shade cover along popular walking and cycling routes to protect users during heat and also to extend the life of trail materials. (City of Vancouver, 2025)
- Implement practices to reduce wildfire risk in trail corridors and prepare for smoke events. (City of Vancouver, 2025)

Policies

A policy evaluation found strength in Comprehensive Plan land use policies promoting resilience but opportunities to address a number of topics to address climate resilience and health. Exhibit 95 below shares example climate mitigation and adaptation options noted in the *Fifth National Climate Assessment Ch. 12. Built environment, urban systems, and cities*. (Chu, 2023) It also provides examples from the Commerce *Climate Planning Guidance* (Commerce, 2023), and the Vancouver Climate Action Framework. (City of Vancouver, 2022) The City could update its Comprehensive Plan policies to catch the plan up to the City's ambitious Climate Action Framework, as well as efforts under the **OUR VANCOUVER 2045** plan such as the Health Impact Assessment.

Exhibit 96: Examples of Land- Mitigation and Adaptation Options in Cities and Built Environments

Options	NCA Examples of Mitigation and Adaptation Options	Commerce Climate Policy Explorer Examples	Vancouver Climate Action Framework
Natural, green, and blue infra structure	Urban ecosystems and biodiversity, street trees, greenery, coastal wetlands and dune systems	High Priority Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.	Strategy NS-1. Increase carbon storage in trees, vegetation, and soil Strategy NS-2. Improve ecosystem resilience

Options	NCA Examples of Mitigation and Adaptation Options	Commerce Climate Policy Explorer Examples	Vancouver Climate Action Framework
			Action #10: Community gardens and local markets
Gray infrastructure	High albedo/reflective pavements, coastal protection (such as seawalls), dams, flood controls, drainage	High Priority Consider climate change, including sea-level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning.	Indirectly; see above (NS-2)
Land management	Zoning to reduce impact exposure and support GHG emissions mitigation, co-location of development with low-GHG transportation and technologies, reduced encroachment on natural lands, fire management, land restoration	High Priority Prioritize and promote public transit expansion and use through coordination of land use and transportation planning. Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.	Strategy TLU-1. Create neighborhoods that support clean modes of transportation
Resource use	Improved water supply, reduced emissions from waste and wastewater	High Priority Manage water resources sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection, and landscape management.	Strategy NS-3. Conserve water resources
Migration and relocation	Managed retreat	In areas with significant vulnerability to climate hazards, facilitate and support long-term community visioning including consideration of managed retreat.	Not addressed

Source: (Chu, 2023), (City of Vancouver, 2022), BERK 2024.

The City's **OUR VANCOUVER 2045** plan incorporates many policies addressing a resilient built environment such as:

- Incorporate Climate Resilient Infrastructure into Development: Integrate climate resilience best practices into new development and infrastructure projects and investments in public spaces. (Policy 72)

- Stormwater Management: Improve water quality, protect watersheds and reduce flood risks by promoting groundwater infiltration, reducing runoff, and advancing effective stormwater best management practices. (Policy 136)
- Adapt Infrastructure to Climate Change: Retrofit existing infrastructure, parks and natural spaces, and construct new facilities to adapt to the localized impacts that will occur in the community due to climate change. (Policy 8)
- Protect and Restore Critical Areas and Shorelines: Protect critical areas, shorelines and other ecologically significant areas, ensure no net loss of ecological function through avoidance and mitigation of impacts, and apply conservation design principles to restore and enhance degraded areas. (Policy 108)
- Equitably Expand Tree Canopy: Utilize canopy assessment data and the City's Equity Index to prioritize areas for tree planting and greening investments. (Policy 53)
- Resilient, Transit-Supportive Infrastructure: Invest in infrastructure that supports reliable, frequent, and accessible transit service as outlined in the Enhanced Transit Network, while adapting to localized climate impacts. Investments should expand mobility options, improve neighborhood access, and deliver health, economic and social benefits. (Policy 124)
- Improve Connectivity Between Parks and Open Spaces: Create an expansive network of linear parks that encourage active transportation, improve community health and wellbeing, enhance tree canopy and stormwater management, and link parks and open space with housing. (Policy 68)

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OUR VANCOUVER

OUR FUTURE 2045

Health Impact Assessment

September 2025

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0. Executive Summary

This Health Impact Assessment (HIA) considers how the growth alternatives studied as part of the **OUR VANCOUVER** Comprehensive Plan periodic update may benefit and impact health in Vancouver as it relates to the built environment.

The analysis is organized around five themes:

- Physical Activity
- Food Access
- Community Connections
- Exposure to Health Hazards
- Housing and Financial Security

Three growth alternatives, as studied in **OUR VANCOUVER** Draft Environmental Impact Statement (DEIS), are included for analysis:

- A No Action Alternative, where existing policies are carried forward. Future growth and development would align with the adopted Comprehensive Plan and development regulations and recent amendments to state statutory requirements that contain self-executing provisions. The No Action Alternative would not meet the City's minimum 2045 targets for new housing units and jobs.
- Two Action Alternatives (Alternative 1 and Alternative 2), which add density and mixed uses and update plan policies. New place types would allow for more dense housing, employment, and activity centers in more areas across the city. Both Action Alternatives would exceed the City's minimum 2045 targets for new housing units and jobs.

The Action Alternatives generally include greater opportunities to improve community health. This is due to the growth patterns of the Action Alternatives and the policy changes associated with them (Exhibit 0-1). Other strategies are also identified in the HIA to build on strengths, address gaps, and mitigate negative health impacts of the growth alternatives. For the purposes of HIA analysis, the city was divided into eight areas (Exhibit 0-2).

Exhibit 0-1: Key Findings, Strategies, and Cobenefits

Theme	Key Findings	Where/Who Impacted	Potential Strategies	Cobenefits of Implementation
 Physical Activity	**Existing:** • Many existing vehicle trips are under 5 miles • There are some gap areas in parks access **No Action:** • More demand for parks due to growth • Most growth in areas without high density of intersections **Action Alternatives:** • Higher growth and higher demand for parks • More opportunity for new parks via impact fees and policy changes • Most growth in areas without high density of intersections • More opportunity for walkability improvements	**Where:** 2, 3A, 3B, 4, 5, 6, 7, 8 (see Exhibit 0-2). **Who:** People with health conditions that could be improved by physical activity	**City:** • Non-motorized infrastructure and safety • Pedestrian scale design • Strategic parks acquisitions **Partner:** • Community-led park and street improvements • School and other partnerships for recreation	Emissions reduction from reduced VMT Equitable access to parks

Theme	Key Findings	Where/Who Impacted	Potential Strategies	Cobenefits of Implementation
Food Access	**Existing:** • Much of the current population has food access challenges **No Action:** • Some growth in areas with low supermarket access **Action Alternatives:** • More growth in areas with low supermarket access, but more opportunity for new stores via density and mixed uses	**Where:** 2, 3a, 5, 6, 7, 8 (see Exhibit 0-2). **Who:** Households with lower incomes are most affected	**City:** • Community gardening and urban agriculture support • Incentives for supermarkets **Partner:** • Food banks, farmers markets • Community and faith organizations	Walkability to supermarkets = lower VMT and emissions Equitable access to food

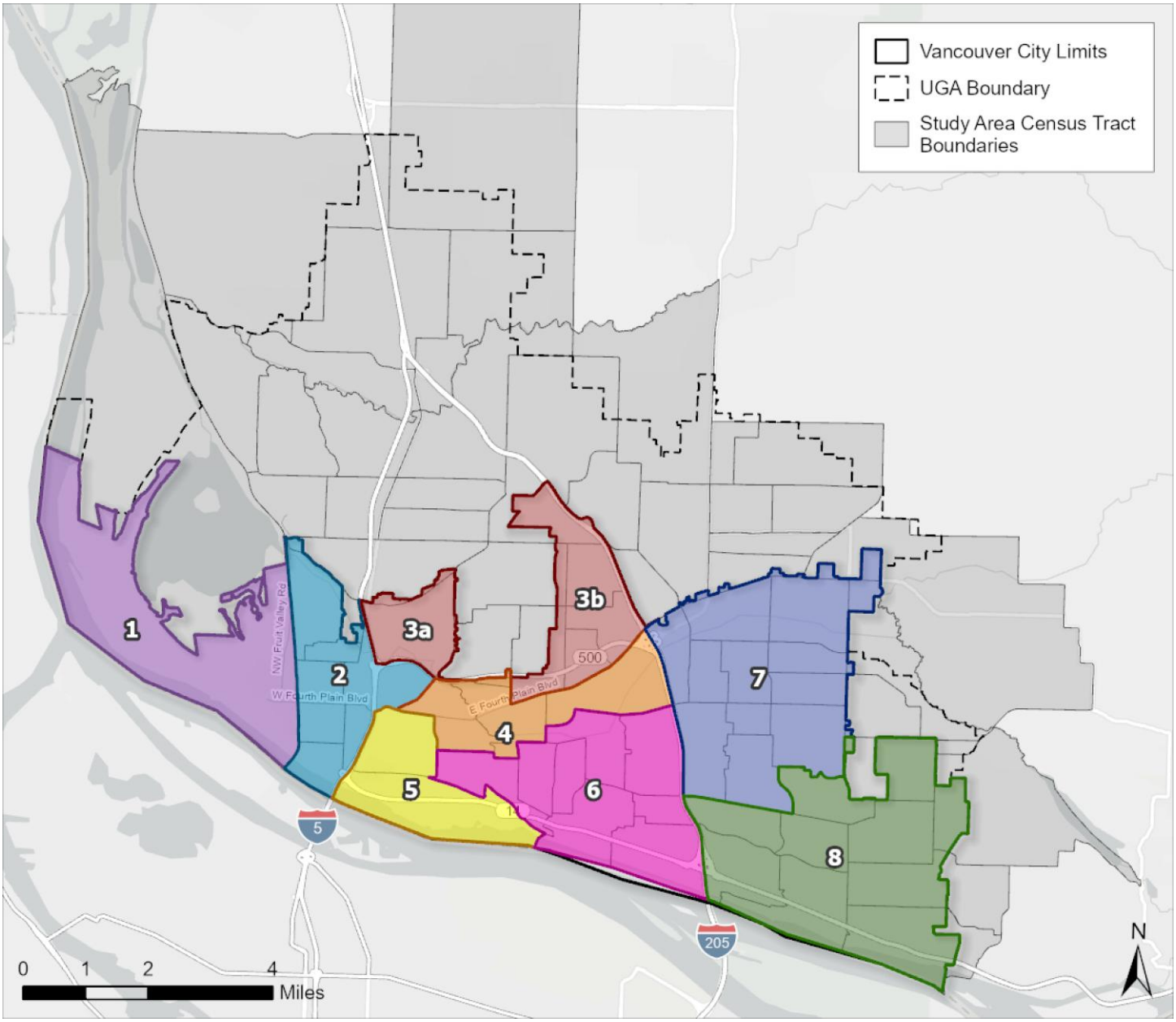
Theme	Key Findings	Where/Who Impacted	Potential Strategies	Cobenefits of Implementation
 Community Connections	**Existing:** • Access to amenities varies • Challenges with childcare and access to social services **No Action:** • Less opportunity for better access to services • Some commercial displacement • Less density and mixed uses **Action Alternatives:** • More opportunity for better access to services • More commercial displacement but better mitigation • More density and mixed uses (especially Alternative 2)	**Where:** Citywide **Who:** Car-dependent households, older adults	**City:** • Incentives for small commercial spaces and lowered parking requirements • Social programs and events **Partner:** • Pop-ups • Regional childcare access	Better walkability to services = lower VMT Equitable access to daily needs

Theme	Key Findings	Where/Who Impacted	Potential Strategies	Cobenefits of Implementation
 Exposure to Health Hazards	Existing: • Air quality is a challenge that is hard to mitigate • Heat islands also present but growth is an opportunity to address them • Other hazards include climate change, water quality, and noise No Action: • Some air and water quality impacts • Some growth in areas with noise • Some growth in heat islands • Some growth in climate hazard areas Action Alternatives: • Some air and water quality impacts but better mitigation • Some growth in areas with noise but better mitigation • More growth in heat islands and more opportunity to add vegetation • Some growth in climate hazard areas and new policies for resiliency	Where: Citywide but especially 2,5, 6, 7, 8 (see Exhibit 0-2) Who: People with existing health conditions, older adults, children	City: • Electric vehicle support • Vegetation requirements • Urban forestry • Shade in parks and rights of way • Design standards for resilience • Education on disposal of chemicals Partner: • C-Tran transit investments • Community-led action planning • Water and air quality monitoring • Emergency hubs	Adding tree canopy cover = reduced emissions Environmental justice

Theme	Key Findings	Where/Who Impacted	Potential Strategies	Cobenefits of Implementation
 Housing and Financial Security	Existing: • Many residents are cost burdened • Displacement is an ongoing concern with growth No Action: • Some new housing but less variety and affordability • Less radon mitigation • Some displacement risk • Some new jobs Action Alternatives: • More new housing and better affordability • More radon mitigation • Some displacement risk but new policies to mitigate • More new jobs and opportunities to shape industries	Where: Citywide Who: Households with lower incomes, single-parent households	City: • Communicating home rehabilitation opportunities and radon testing • Removing housing barriers • Anti-displacement policies • Workforce development and industry support Partner: • Regional collaboration on housing and economic development	Energy efficiency of newer buildings Less displacement, more financial stability, housing for all incomes

Notes: Emissions Reduction Cobenefit, Equity Cobenefit

Exhibit 0-2: Analysis Areas



Source: City of Vancouver, 2025; BERK, 2025.

1. Introduction

Purpose

The City of Vancouver is conducting a Health Impact Assessment (HIA) to:

- **Evaluate each of the three OUR VANCOUVER land use alternatives (defined in the Draft Environmental Impact Statement)** from a health impact lens and support the selection of a preferred alternative and mitigation measures.
- **Provide policy recommendations for improved community health.**
- **Provide analysis to support communication** with the public, policy makers, and key decision makers the various health-related tradeoffs between the three alternatives.

The City's Comprehensive Plan was last updated in 2011 and is due for a periodic update by the end of 2025. The **OUR VANCOUVER** Comprehensive Plan will guide Vancouver's growth and development through the year 2045. The update is an opportunity to shape policies and actions that can improve the health of current and future Vancouver residents.

The Plan is guided by a goals framework, which emphasizes equity, livability, opportunity, sustainability, and health, among other values. For the Climate, Environment, Community Health, Sustainability, and Resiliency chapter, the key themes are:

- Equitable and Just Transition
- Increase Tree Canopy
- Decrease Emissions
- Community Preparedness
- Community Stewardship and Resilience
- Holistic Cycles of Consumption and Production
- Access to Healthy Food
- Built Environment Promotes Health.

Key Questions

What is an HIA? A Health Impact Assessment (HIA) evaluates the potential health effects of a proposed plan, policy, project, or program. HIAs provide recommendations during the decision-making process to increase positive health effects and minimize negative impacts (CDC, 2025).

What type of HIA is this? This is a "rapid" HIA, in which the analysis is primarily based on existing data from a variety of sources. However, this HIA and its recommendations are also supported by engagement with key stakeholders as part of the periodic update.

Who is involved in this work? City staff and the project consultant team led the HIA. Clark County Public Health provided input on the framework and data sources. The City's Climate Working Group, which consists of various community organizations, reviewed the draft findings and informed the final document. The HIA is a parallel effort to the Vancouver Comprehensive Plan Periodic Update, with its own related engagement process that emphasizes Equity Priority Communities that have been historically marginalized or are most vulnerable. Staff will engage the Vancouver Planning Commission and City Council throughout the Comprehensive Plan periodic update process.

Who is the decision maker? The Planning Commission will provide a recommendation to the City Council on the Comprehensive Plan Periodic Update, including a preferred Land Use Alternative. The City Council is the decision maker for the Comprehensive Plan Periodic Update.

Goals

The HIA seeks to accomplish the following goals, particularly as they relate to health and the built environment:

- Ensure the **OUR VANCOUVER** Comprehensive Plan emphasizes health-related goals and policies, particularly in the land use element and growth strategies.
- Influence policy implementation to positively impact resident health, particularly communities that are vulnerable and overburdened.
- Ensure the links between connected and accessible neighborhoods, walkability, and health benefits are clearly communicated to the public and decision makers and clearly evaluated within each of the three (3) alternatives.
- Develop recommendations that are clear and feasible to implement.
- Create awareness about health disparities in Vancouver.
- Engage community-based organizations and the general public on health considerations for the plan update.
- Use communication methods such as plain language, infographics, and maps to ensure the HIA is accessible to the general public as well as decision makers.

HIA Process

HIA is a systematic process to evaluate the potential health impacts of a proposed action, such as a plan or policy. The following are the steps that generally form an HIA:

- Screening – documenting why an HIA is appropriate for a given project or decision *(Chapter 1: Introduction)*

- Scoping – setting parameters of assessment and identifying the most relevant health outcomes *(Chapter 2: Scoping the HIA)*
- Assessment – describing baseline conditions and estimating future impacts *(Chapters 3-6: Baseline Assessment, Metrics and Evaluation Framework, Impact Assessment and Strategies, and Community Engagement Summary)*
- Reporting – disseminating findings and making recommendations *(Chapter 5: Impact Assessment and Strategies)*
- Monitoring – evaluating the effectiveness of the HIA and health impacts of the implemented proposal *(Chapter 7: Next Steps)*

Previous Health Impact Assessment in Vancouver

Clark County completed a Rapid Health Impact Assessment for the Vancouver Comprehensive Plan in 2011. The assessment focused on two primary topics: physical activity and access to healthy food. The HIA included an evaluation of the proposed policy changes in the plan and found no evidence of negative disproportionate impacts on vulnerable populations. The key takeaway was the importance of implementation of the Comprehensive Plan through development standards, and recommendations for additional actions to improve opportunities for physical activity and healthy food access. The City also conducted a brief HIA for park development in the Rose Village neighborhood in 2010.

Integration with Comprehensive Plan Update

The Comprehensive Plan update process includes evaluation of three land use alternatives (including one "no action" alternative), which distribute the city's future housing, job, and population growth in different ways. The HIA will evaluate these alternatives for potential health effects, relative to one another. This evaluation will inform the City's selection of a preferred alternative, which will provide the basis for the updated plan that will be adopted by the end of 2025. The HIA will also provide policy recommendations for the plan as a whole that could apply across all the land use alternatives.

Exhibit 1-1: HIA Process



Growth Alternatives

The City's periodic update to the Comprehensive Plan, the 20-year growth plan for Vancouver, is due in 2025. Under the State Environmental Policy Act (SEPA), an environmental impact statement (EIS) is being prepared to consider the environmental impacts of the plan. The Draft EIS analyzes three land use possibilities or "alternatives":

- No Action Alternative assumes that the Comprehensive Plan update and associated changes to the zoning code and development regulations would not be adopted. Future growth and development would occur in line with the current adopted City Comprehensive Plan and development regulations, as well as recent amendments to state statutory requirements that contain self-executing provisions. The No Action Alternative would not meet the City's minimum 2045 targets for new housing units and jobs.
- Alternative 1 assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented, including new place types that allow more dense housing, employment, and activity centers in more areas across the city. Alternative 1 would allow for more dense, mixed-use development patterns than the No Action Alternative but in fewer areas than Alternative 2. Alternative 1 would exceed the City's minimum 2045 targets for new housing units and jobs.
- Alternative 2, like Alternative 1, assumes the proposed Comprehensive Plan Update and associated changes to the zoning code and development regulations would be implemented. Alternative 2 would allow for the highest density, intensity, and mix of uses of all of the alternatives in a greater number of areas of the city than Alternative 1. Alternative 2 would exceed the City's minimum 2045 targets for new housing units and jobs and would provide the highest capacity among the alternatives.

This Health Impact Assessment reviews each alternative for its potential impacts to health based on a series of metrics.

See Chapter 4 for maps of each growth alternative.

2. Scoping the HIA

For this HIA, the City and Consultant team focused on five themes around which to organize the evaluation. These were identified based on the themes of the **OUR VANCOUVER** Comprehensive Plan update, review of peer HIAs, Vancouver's previous rapid HIA (2011), and engagement with City and County staff. This includes Physical Activity, Food Access, Community Connections, Exposure to Health Hazards, and Housing and Financial Security.

Exhibit 2-1: Themes

Theme	Subtopics	Description
 Physical Activity	Parks access Walkability and bikeability	Built environment factors to encourage community members to be more active
 Food Access	Access to healthy food sources	Physical proximity and access to supermarkets and other sources of healthy food
 Community Connections	Access to services Social connection and isolation	Access to essential services and spaces that encourage people to meet and engage
 Exposure to Health Hazards	Air and water quality Noise Urban heat Climate impacts	Environmental health risks in relation to areas of planned growth
 Housing and Financial Security	Safe and healthy housing Affordable housing Displacement Living wage jobs	Topics related to housing quality and access and economic opportunities in Vancouver

3. Baseline Assessment

The following baseline data is intended to provide background context for the HIA and to inform the evaluation of the three land use alternatives. This includes demographic data as well as data relating to the health themes scoped for this HIA. A policy audit is also included to review Comprehensive Plan policies currently in place related to health.

Population

Social determinants of health (SDOH) are nonmedical factors that influence health outcomes (CDC, 2024). SDOH include access to resources such as housing, education, wealth, and employment, which are impacted by systemic injustices. Addressing differences in SDOH achieve better health equity, where all people have the opportunity to be in their best health. Several key demographics relating to SDOH are discussed below. Race and ethnicity is included due to the health inequities that continue to persist due to a history of systemic racism in the United States.

Exhibit 3-1: Demographics Summary

Demographic	Percentage
Race and Ethnicity	
American Indian and Alaska Native	0.4%
Asian	5%
Black or African American	3%
Native Hawaiian and other Pacific Islander	2%
White	65%
Two or More Races	7%
Other Race	0.5%
Hispanic or Latino	17%
Income and Poverty	
Median Household Income	$80,618
Household income below the poverty level	11%
Household income at or above the poverty level	89%
Housing Tenure	
Renter households	50%
Owner households	50%
Renter households spending 30%+ of income on rent	53%

Demographic	Percentage
Education	
High School Diploma or Higher	92%
Bachelor's Degree or Higher	32%
Language Spoken at Home by Limited English Speaking Households	
Russian, Polish, or other Slavic language	0.9%
Spanish	1.7%
Other Indo-European	0.2%
Chinese (Mandarin and Cantonese)	0.4%
Vietnamese	0.2%
Tagalong	0.1%
Other Asian and Pacific Island Languages	0.2%
Disability	
Population with One or More Disabilities	9.7%
Age	
Median Age	38
19 and Younger	24%
Over 65	16%
Health Insurance Access	
Adults Without Coverage	9%

Source: US Census Bureau, 2023; CDC, 2022; BERK, 2025.

Race and Ethnicity

In Vancouver, 5% of residents identify as Asian, 3% as Black or African American, 0.4% as American Indian and Alaska Native, 2% as Native Hawaiian and other Pacific Islander, 65% as White, and 7% as Two or More Races (U.S. Census Bureau, 2023). 17% of the population identifies as Hispanic. Vancouver's population became more racially and ethnically diverse from 2010-2020, with a 64% increase in the population of communities of color (Design Workshop, 2024; U.S. Census Bureau, 2020; U.S. Census Bureau, 2010).

Income and Poverty

Median household income in Vancouver is $80,618. 11% of households are experiencing poverty citywide (U.S. Census Bureau, 2023).

Housing Tenure

Renter and owner households are split evenly (U.S. Census Bureau, 2023). Housing costs in Vancouver are high, and 53% of renters are rent-burdened (spending more than 30% of their income on rent).

Education

92% of Vancouver residents hold a high school diploma and 32% of Vancouver residents hold a bachelor's degree (U.S. Census Bureau, 2023).

Language

20.7% of the Vancouver population speaks a language other than English at home (U.S. Census Bureau, 2023). About 8.5% of the population speaks English less than "very well" (U.S. Census Bureau, 2023).

Disability

Approximately 15.1% of Vancouver residents are living with a disability as of 2023 (U.S. Census Bureau, 2023).

Age

Median age in Vancouver is 38 years old. Approximately 24% of the population is 19 years old and younger and 16% of the population is over age 65 (U.S. Census Bureau, 2023).

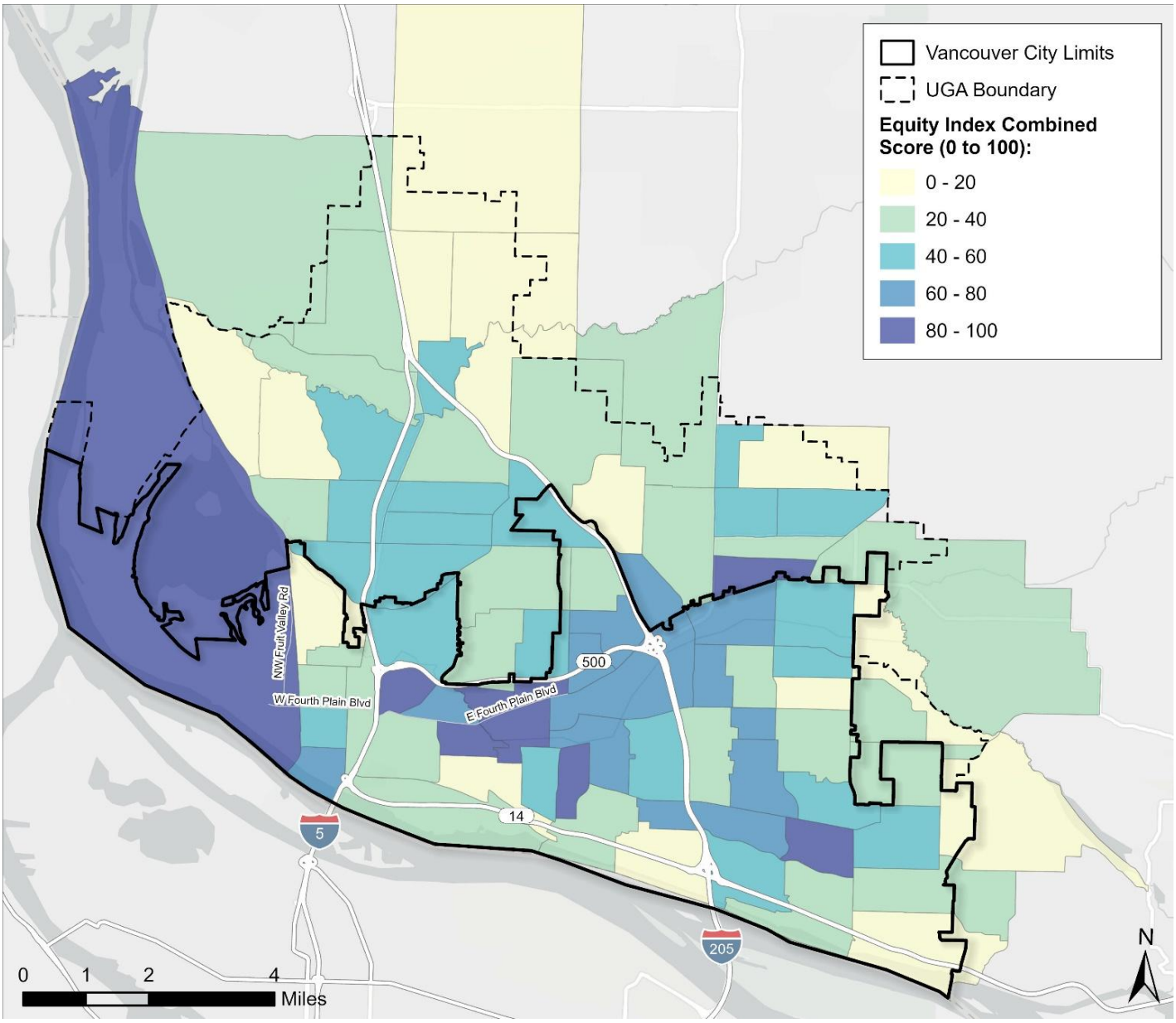
Health Insurance Access

The Centers for Disease Control (CDC) estimates that 9% of adults aged 18-64 in Vancouver do not have health insurance. This is slightly lower than the national estimate of 11% (CDC, 2022).

Equity

Vancouver has an Equity Index, which helps the City prioritize investments based on the needs of historically marginalized and vulnerable communities. The Equity Index shows higher scores, or greater disparities, for several Census block groups, including areas around Fruit Valley, Rose Village, Fourth Plain Village, and Mill Plain Boulevard on the east side of the city (Exhibit 3-2).

Exhibit 3-2: Vancouver Equity Index



Source: City of Vancouver, 2020; BERK, 2024.

Health Outcomes

Data from the CDC shows health outcomes for Vancouver's adult population and comparisons to Clark County. This includes similar rates of asthma, coronary heart disease, chronic obstructive pulmonary disorder, diabetes, and self-reported poor physical health, but higher rates of poor mental health and lower rates of high blood pressure (see Exhibit 3-3).

Almost a third of adults in Vancouver have been diagnosed with high blood pressure, a key risk factor for heart disease. Heart disease is a major cause of death in Vancouver, with 2018 rates of 176 male deaths and 118 female deaths per 100,000. Chronic lower respiratory diseases, including asthma and chronic obstructive pulmonary disease, accounted for 210 deaths per 100,000. Diabetes caused 507 deaths per 100,000 (Clark County, 2018; Design Workshop, 2024).

Exhibit 3-3: Health Data for Vancouver and Clark County

Measure	Vancouver (% of adults)	Clark County (% of adults)
Hypertension (High Blood Pressure)	28.1%	29.2%
Asthma	11.5%	10.8%
Coronary Heart Disease	5.1%	5.3%
Chronic obstructive pulmonary disease (COPD)	6.3%	6.1%
Diabetes	8.8%	9.2%
Poor Mental Health (mental health not good for 14 days or more)	17.5%	15.8%
Poor Physical Health (physical health not good for 14 days or more)	11.7%	11.2%

Source: CDC, 2022.

Physical Activity

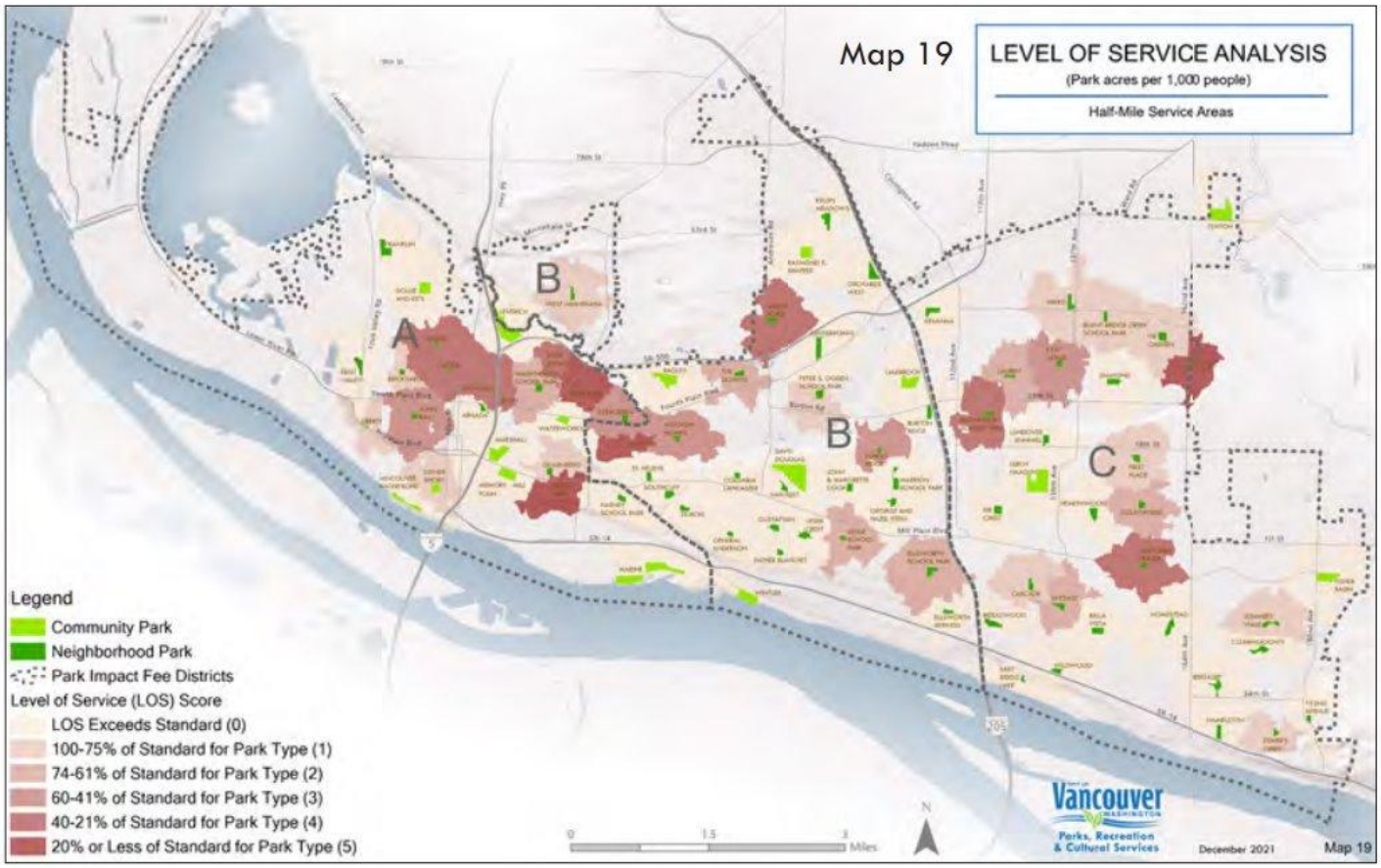
- **Physical Activity Summary:** Investments are needed in park and active transportation gap areas to support active living throughout Vancouver.

Parks Access

Parks can promote health by providing a space for people to be physically active, whether through sports or unstructured activities like walking. A report from the Trust for Public Land suggests that having parks closer to homes is associated with improved health for people of all ages, including lower blood pressure, reduced cardiovascular risk, and better mental health (Trust for Public Land, 2023).

In Vancouver, access to parks varies across the city, with some areas exceeding the City's level of service for park acreage and others having less than 20% of the park acreage needed to meet the level of service (Exhibit 3-4). Areas of note include Fruit Valley, Rose Village, Fourth Plain Village, parts of Hudson's Bay, and several areas in the east side of the city.

Exhibit 3-4: Half-Mile Parks Service Areas

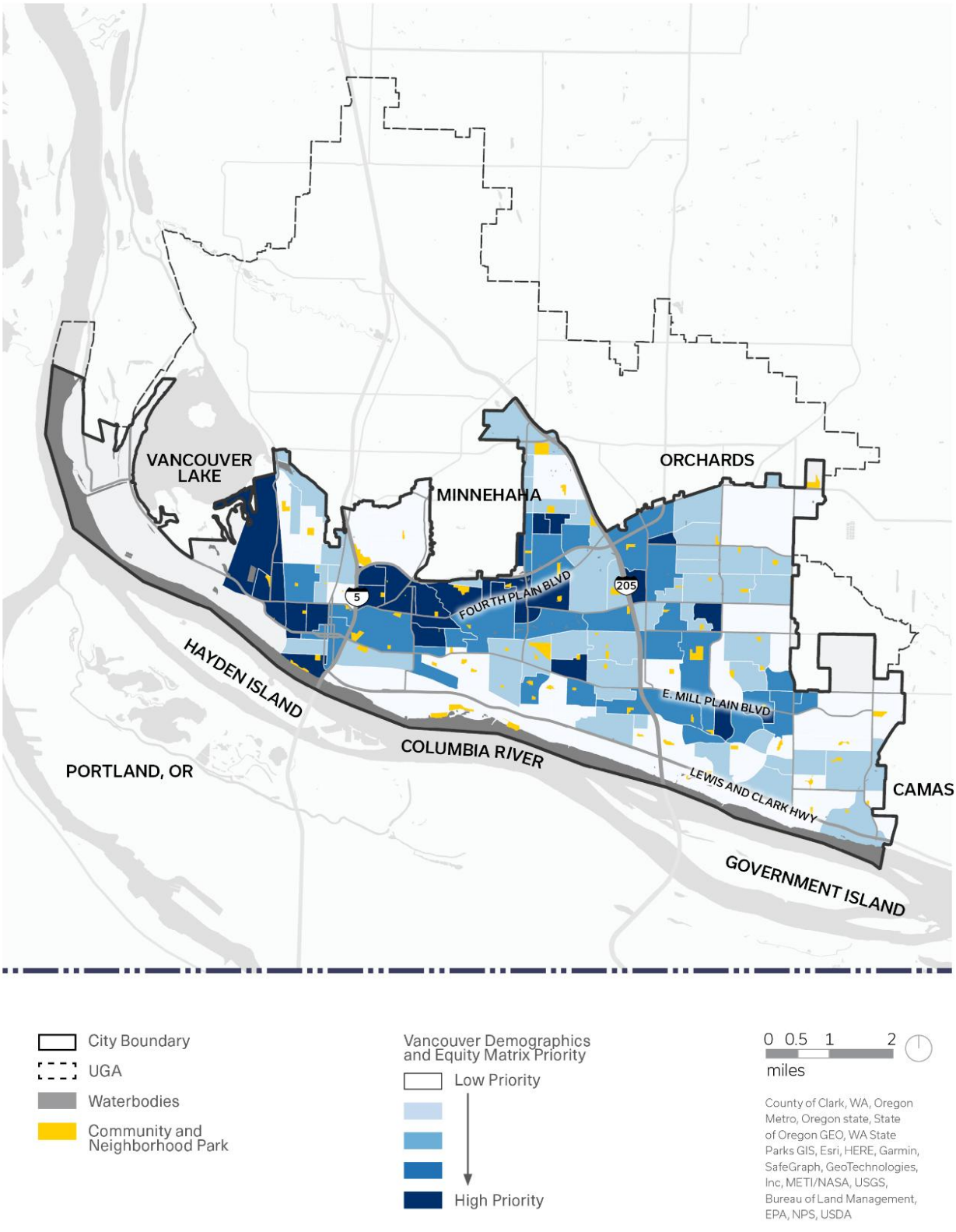


Source: City of Vancouver, 2022.

Based on community demographics and existing level of service, Exhibit 3-5 identifies high-priority areas of the city for future park investment. Several high-priority areas are located in and around the Bagley Downs and Rose Village neighborhoods in the north-central part of the city, as well as Fruit Valley on the west side of the city and nearby neighborhoods.

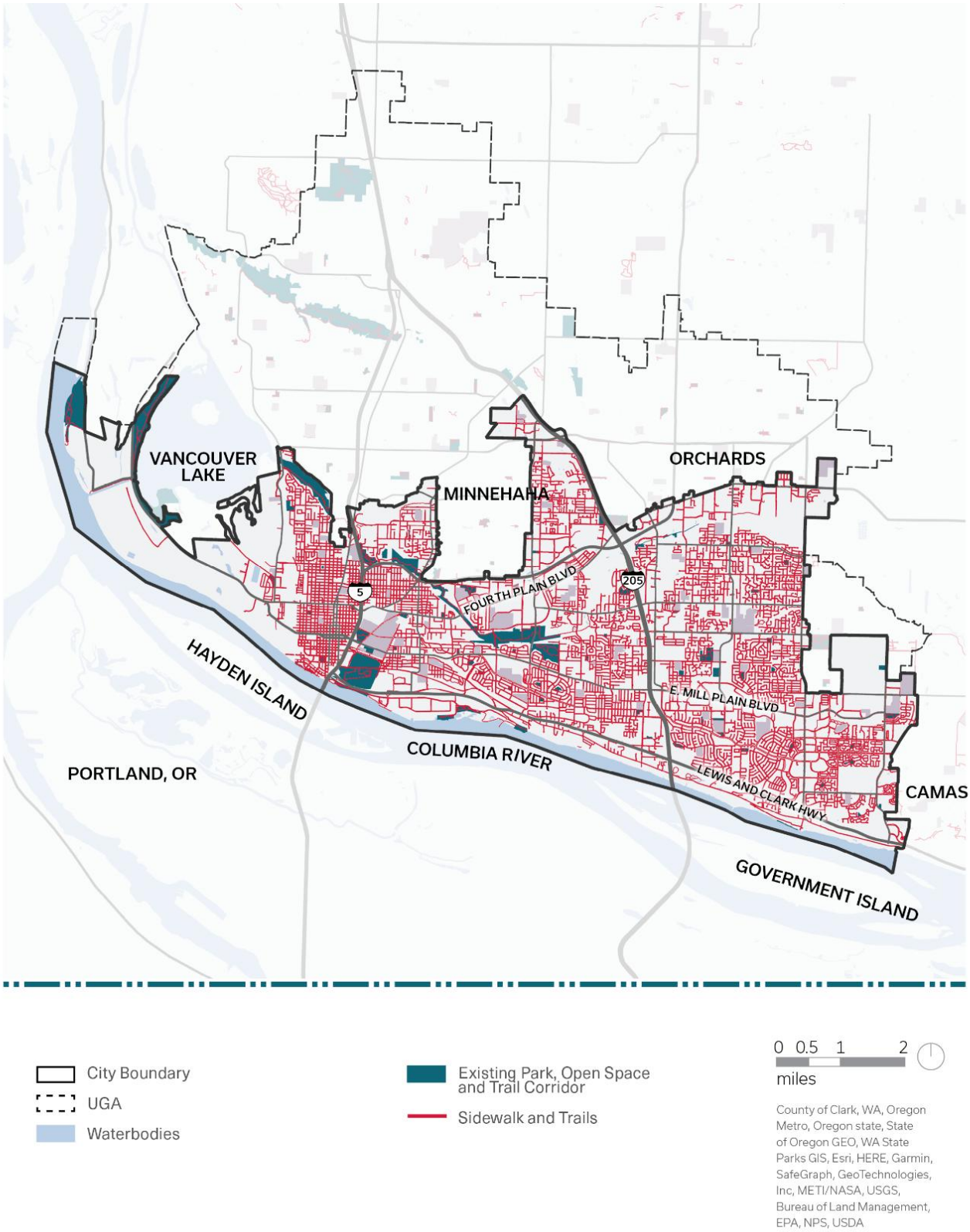
Pedestrian infrastructure is also a factor in park access. Exhibit 3-6 shows where parks are well served and poorly served by sidewalks. Known sidewalk gaps are dispersed throughout Vancouver, and the City plans to assess these through the 2025 Comprehensive Plan update.

Exhibit 3-5: Park Equity



Source: Design Workshop, 2024.

Exhibit 3-6: Park/Sidewalk Interface



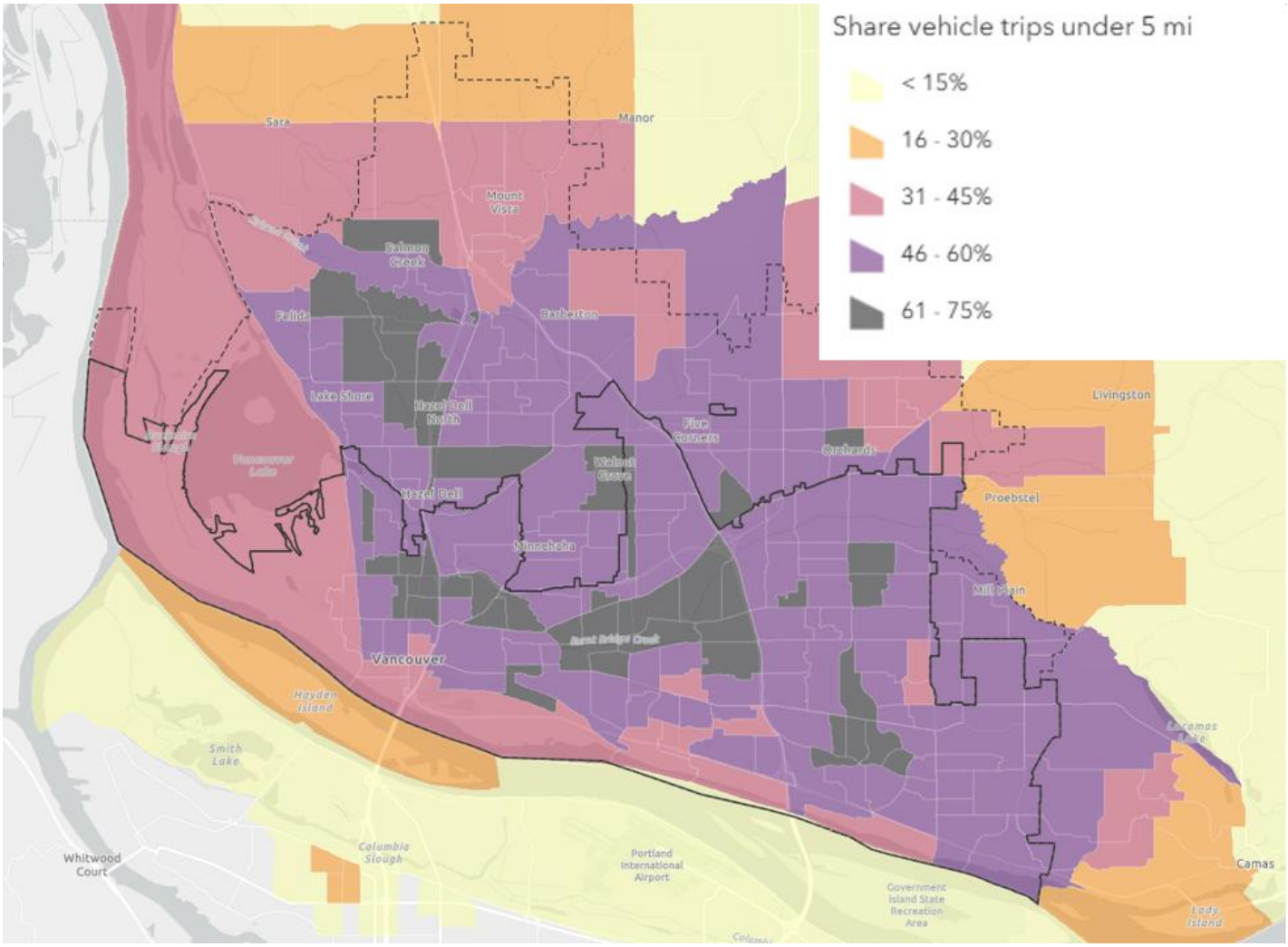
Source: Design Workshop, 2024.

Active Transportation

Infrastructure and urban design for walkability and bikeability can also encourage a more physically active population. Vancouver has an existing active transportation network, with trails, sidewalks, and bike lanes (Exhibit 3-8, Exhibit 3-9, and Exhibit 3-10). Vancouver also has bus rapid transit (BRT), and 47,000 Vancouver residents live within a quarter mile of the Vine BRT and the Mill Plain BRT (Design Workshop, 2024). However, only 2% of Vancouver workers walk to work, 0.5% bike to work, and 3% take public transit (and are likely to walk some amount in their commute), while the overwhelming majority (75%) drive alone to their jobs (Design Workshop, 2024).

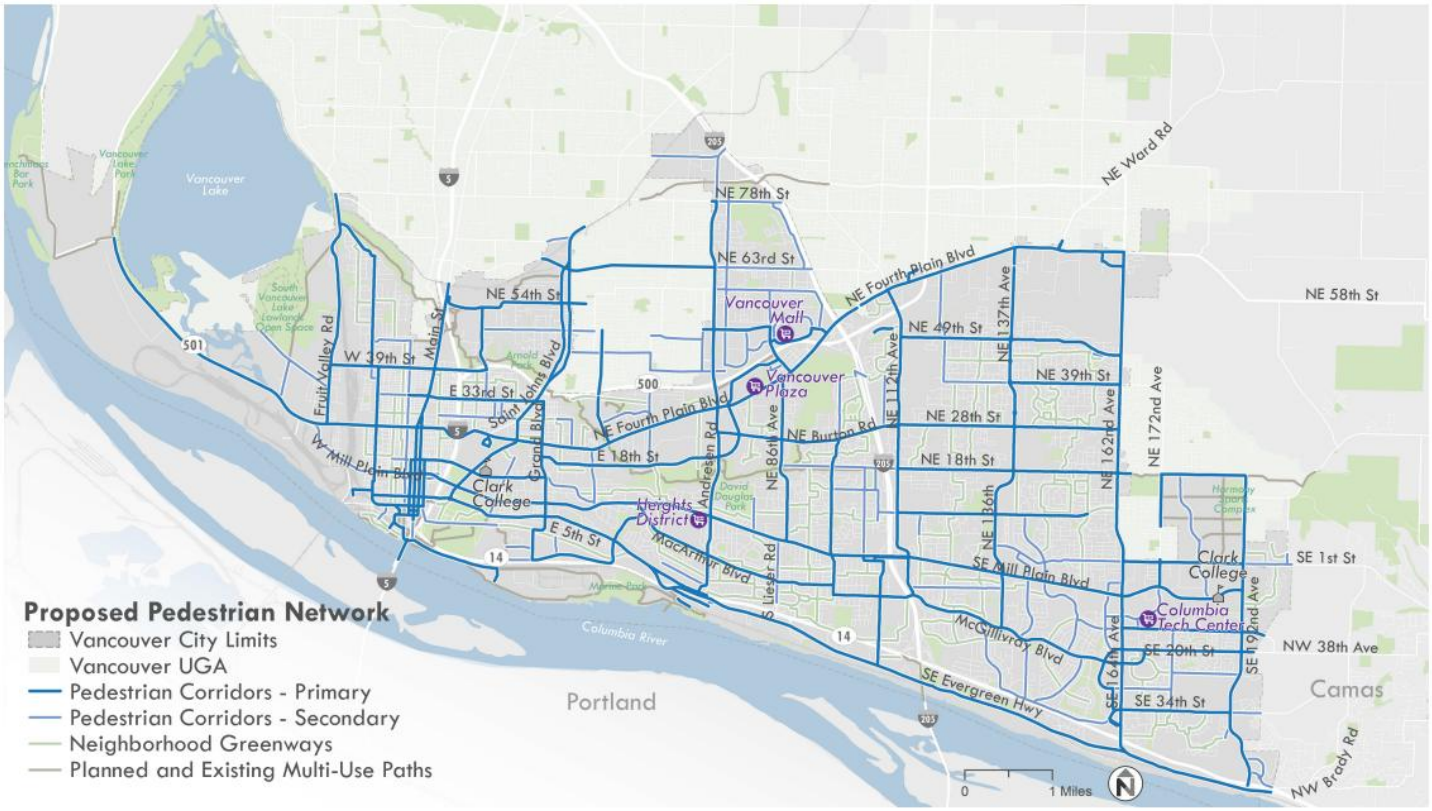
Vancouver is an economic hub for the region, and only 34% of workers in the city also live in Vancouver, according to Census OnTheMap (U.S. Census Bureau, 2021). However, there are many parts of the city where the majority of vehicle trips occurring, not limited to work commute trips, are under 5 miles long (Exhibit 3-7). Many of these short trips have the potential to be converted to active transportation or transit trips, if improvements to infrastructure, urban design, and programming effectively create behavior change.

Exhibit 3-7: Trips Under 5 Miles



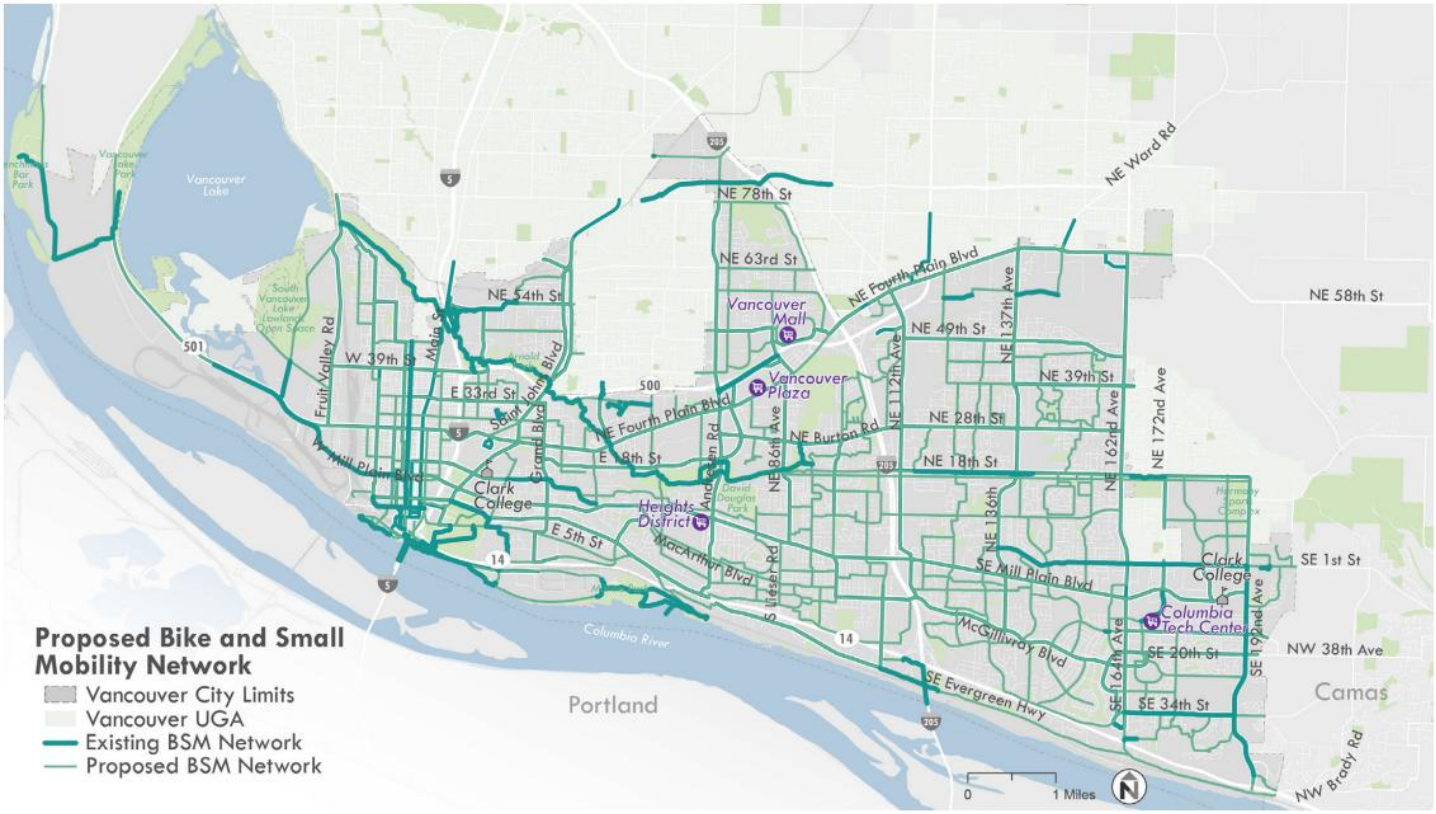
Source: City of Vancouver, 2024; Alta Planning + Design, 2023; BERK, 2024.

Exhibit 3-8: Walking and Rolling Network



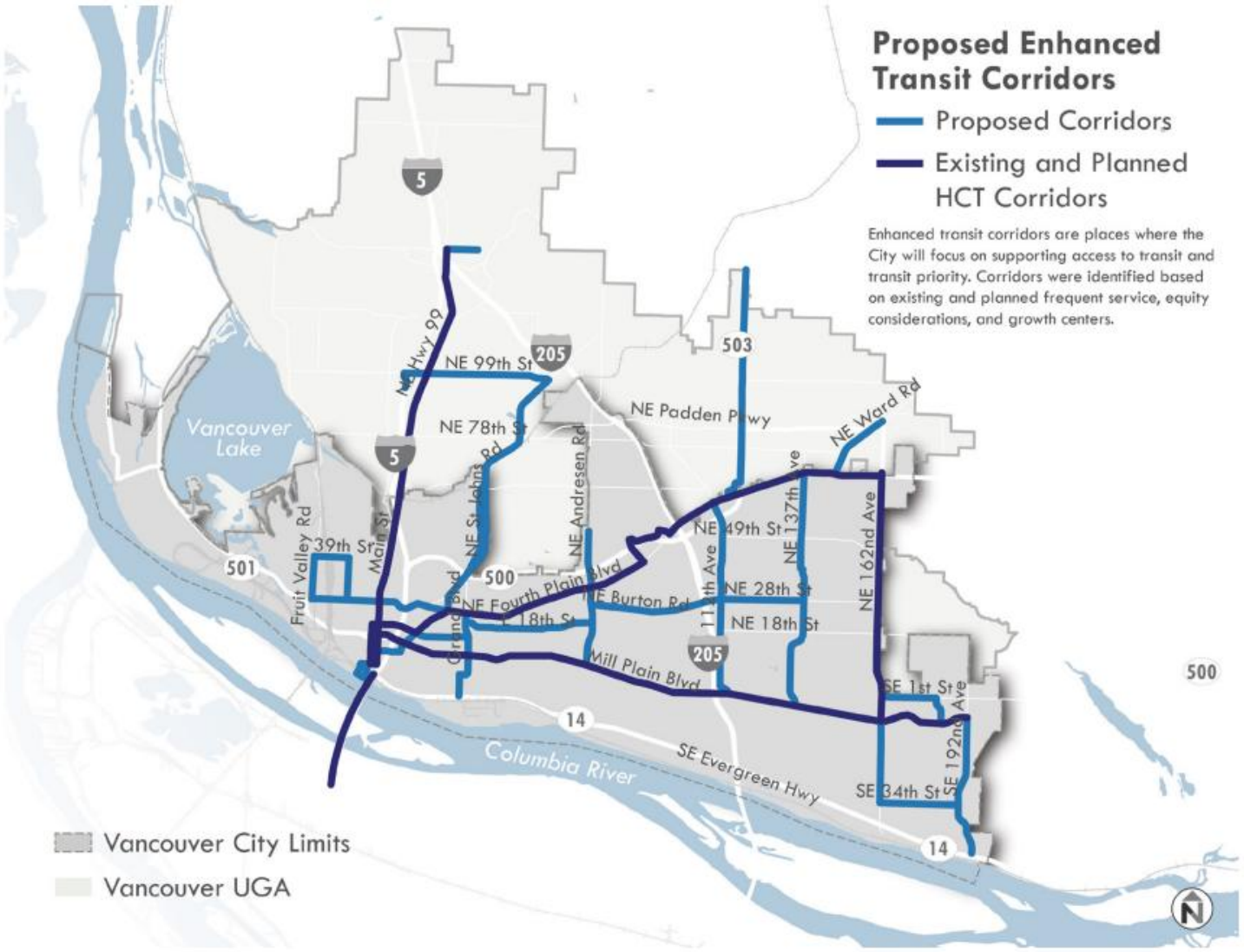
Source: City of Vancouver, 2024.

Exhibit 3-9: Bicycling and Small Mobility Network



Source: City of Vancouver, 2024.

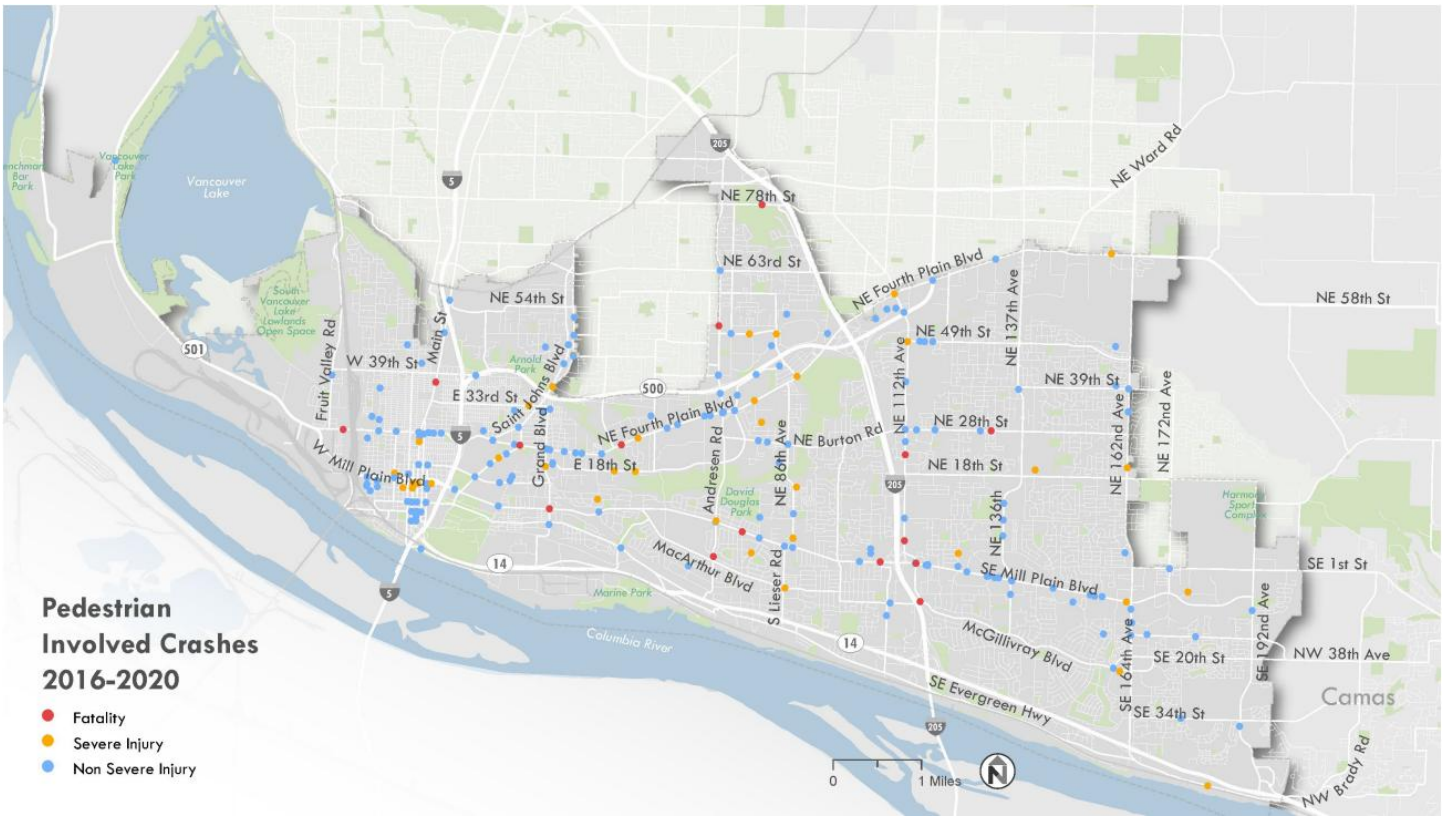
Exhibit 3-10: Proposed Enhanced Transit Corridors



Source: City of Vancouver, 2024.

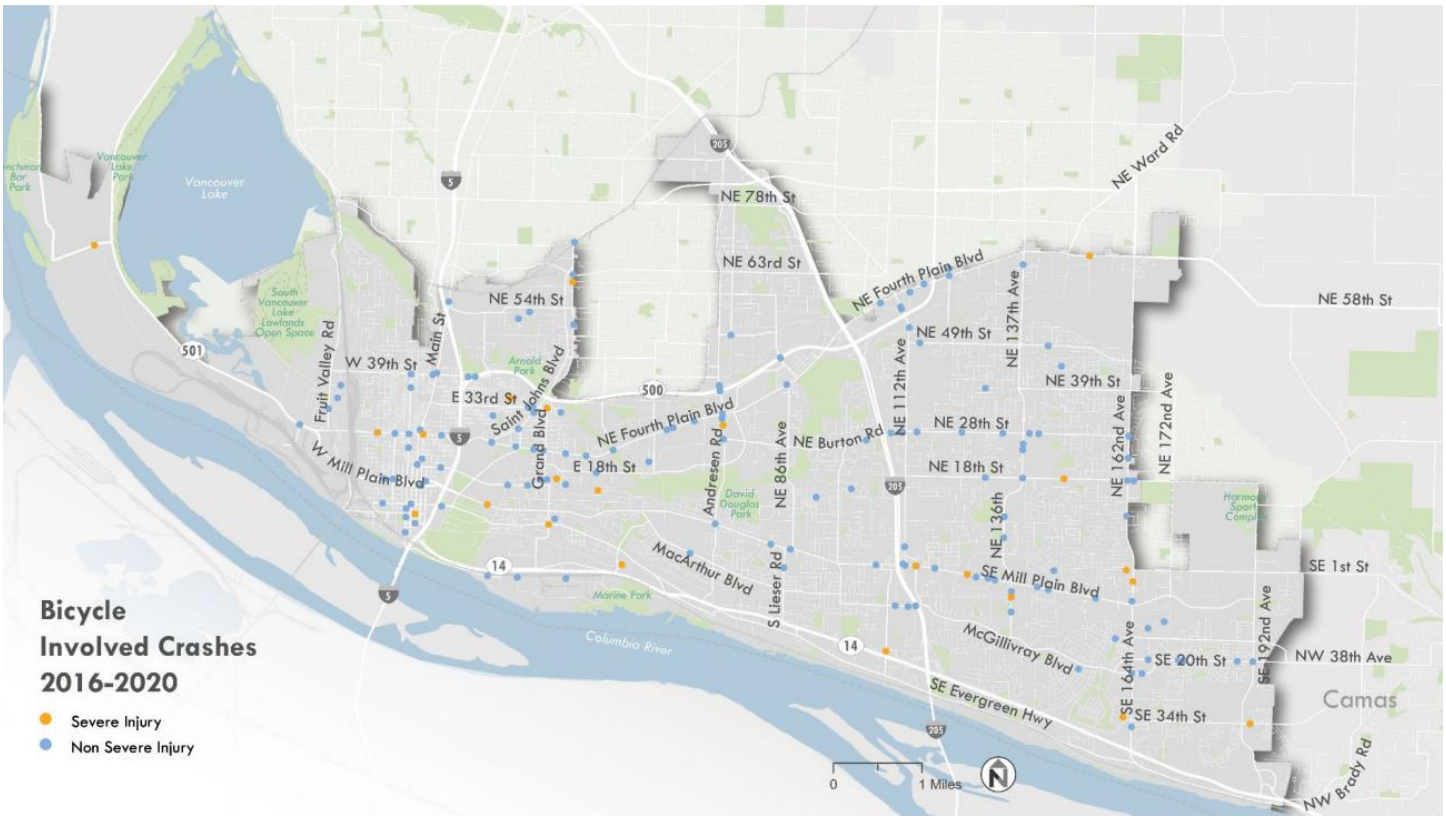
Safety is a key concern for active transportation modes. Between 2016 and 2020, there were 76 fatal and severe-injury crashes involving a pedestrian or bicyclist, per the City's 2022-2026 Local Road Safety Plan (City of Vancouver, 2022). These crashes most commonly involved pedestrians crossing at non-intersection locations without a crosswalk, but many took place at a signalized intersection. Principal arterials were the site of 27% of all pedestrian crashes, 47% of pedestrian fatalities, and 30% of pedestrian severe injuries. Specific locations for pedestrian- and bicycle-involved crashes from 2016-2020 are shown in Exhibit 3-11 and Exhibit 3-12.

Exhibit 3-11: Crashes Involving Pedestrians 2016-2020



Source: City of Vancouver, 2022.

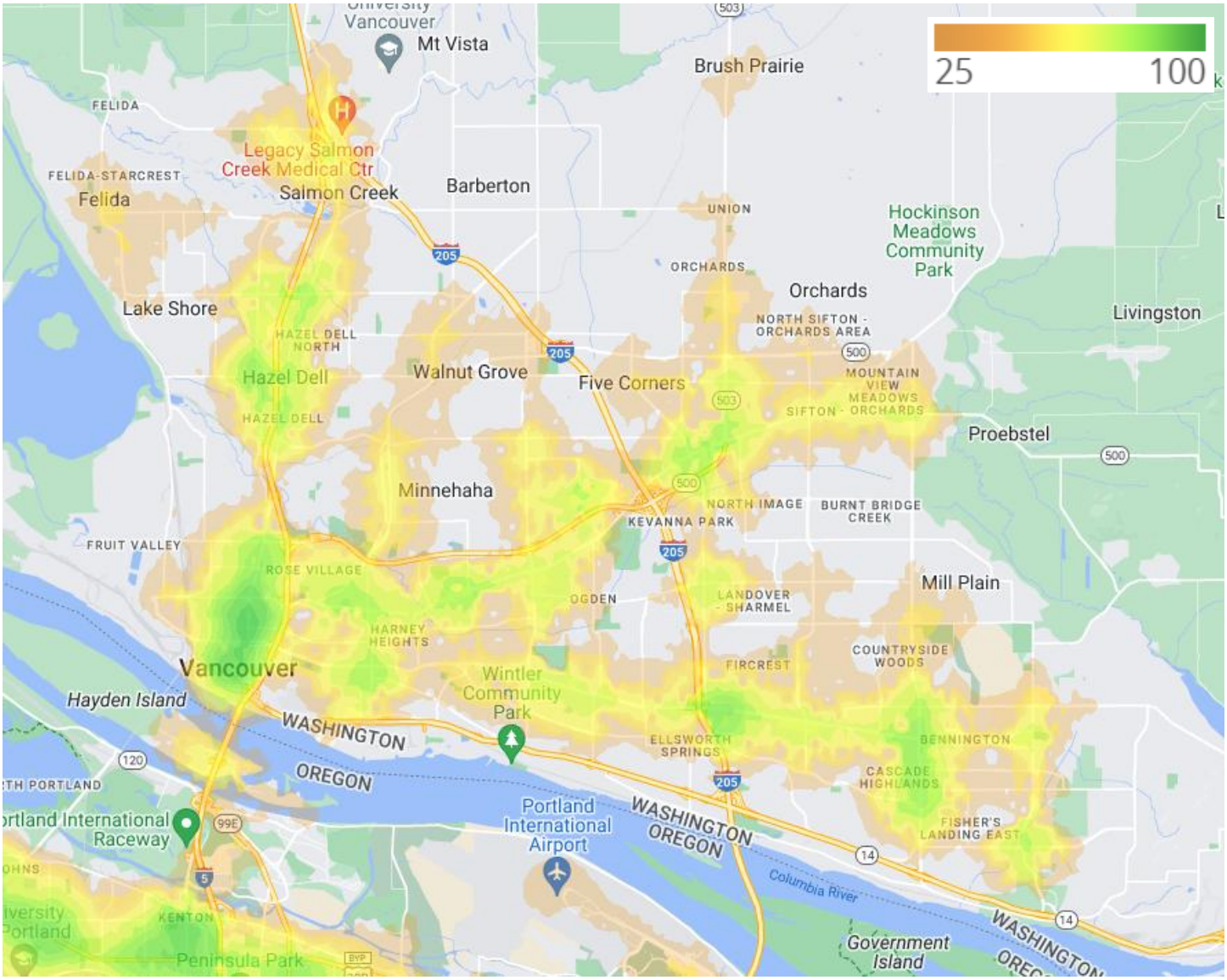
Exhibit 3-12: Crashes Involving Bicyclists 2016-2020



Source: City of Vancouver, 2022.

Walk Score is one way of measuring the walkability of a place (Walk Score, 2024). It provides a number between 0 and 100 based on the amenities available nearby, population density, and road metrics. In Vancouver, scores vary significantly, with some areas, such as the Esther Short, Hough, and Arnada neighborhoods in the downtown core, reaching scores near 100, while other areas score at the lower end of the range (Exhibit 3-13). Intersection density, as one metric of walkability, is highest in Esther Short, Hough, Arnada, Carter Park, Shumway, Lincoln, Rose Village, Fircrest, and around Clark College.

Exhibit 3-13: Walk Score Heat Map



Source: Walk Score, 2024.

Food Access

- **Food Access Summary:** Supermarket access varies across the city and addressing gaps could improve community health.

Socioeconomic factors and neighborhood patterns can affect households' ability to access food, particularly fresh and healthy foods. Many households in Vancouver are facing food insecurity, with 15.5% receiving Supplemental Nutrition Assistance Program (SNAP) support (U.S. Census Bureau, 2022). In the 2021-2022 school year, 48% of students in Vancouver received free and reduced lunch (Design Workshop, 2024). The 2024 Clark County Community Needs Assessment survey also found that food assistance and access to fresh and healthy foods were among the top physical health services needs for Vancouver respondents (Clark County, 2021).

In the context of the city's built environment, some parts of Vancouver do not have any supermarkets within one mile of housing (Exhibit 3-14). While physical proximity to supermarkets is only one factor in a household's access to food, it does play a role, as longer trips take time and fast-food and convenience stores may be located closer and be easier to get to. Some households living near grocery stores, however, may also need to travel for food if the nearby store is too expensive or if they rely on food banks.

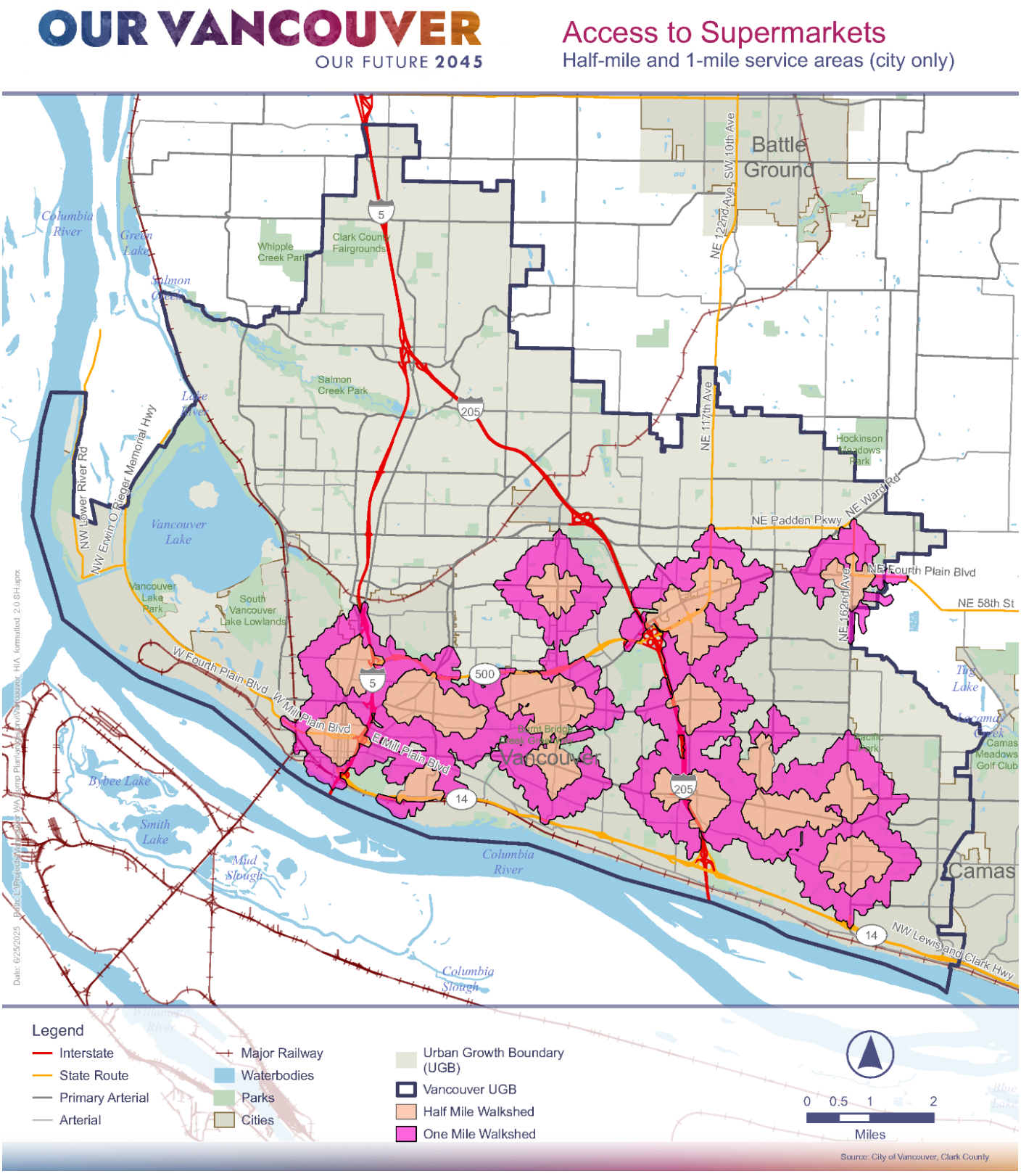
For food insecure households, food banks provide necessary support in access to nutrition. Clark County Food Bank partners with other organizations to distribute food at multiple food pantries throughout Vancouver, which have varying service times during the week (Exhibit 3-15).

The City of Vancouver also has five established community gardens where people can grow food in designated areas of some public parks. Gardens operated by the City include Campus Garden, Ellsworth Road Garden, Fruit Valley Park Garden, Leroy Haagen Memorial Community Park Garden, and Marshall Community Park Garden (City of Vancouver, 2022). Private non-profits, churches, and school groups operate additional garden spaces. Between 2014 and 2021, 1,671 people participated in the City's garden programs, 80% of whom were Vancouver residents. Residents over age 65 have reduced rates to secure a plot. Gardens open for the season in April and close in November. Urban Abundance, a local non-profit, also supports the creation of edible landscapes, harvesting local fruit and building publicly accessible foodscapes (Urban Abundance, 2025).

While there is only a small amount of urban agriculture within Vancouver, mostly located near Vancouver Lake, Clark County has an active farming community that serves the city through area farmers markets. Farmers markets in Vancouver include the Downtown Market, open year-round, and the East Vancouver Market, open in the summer (Vancouver Farmers

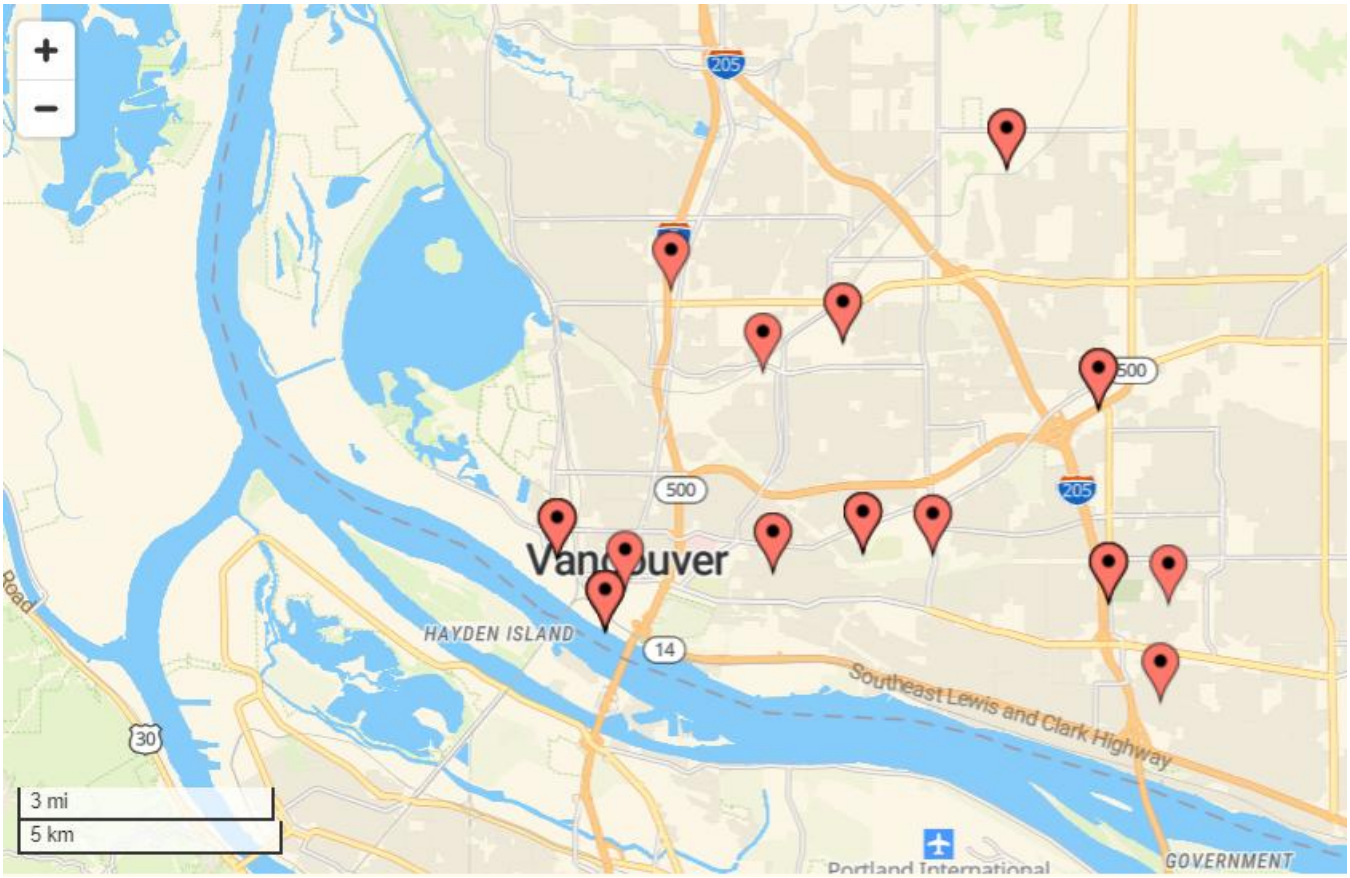
Market, 2025). The markets participate in SNAP Market Match, with which SNAP/Electronic Benefits Transfer (EBT) customers can spend their benefits on farmers market produce, and their spending is matched dollar for dollar up to $25 in vouchers. The Vancouver Farmers Market also supports the Market Box Produce Prescription Program, in partnership with Vancouver Clinic and American Heart Association, delivering produce to patients every week. Some farms also have Community Supported Agriculture (CSA) programs where households can buy a share of produce during the growing season that they can pick up or have dropped off on a regular schedule (Clark Food and Farm Network, 2025).

Exhibit 3-14: Supermarket Access – 1-mile Radius



Source: City of Vancouver, 2024; US Census, 2022 (ACS 5-year estimates); BERK, 2024.

Exhibit 3-15: Clark County Food Pantry Sites



Source: Clark County Food Bank, 2024.

Community Connections

- **Community Connections Summary:** Some neighborhoods have a low density of services and amenities, creating challenges with access to healthcare, childcare, and daily needs. Social isolation is also a challenge nationally that can be improved through programming.

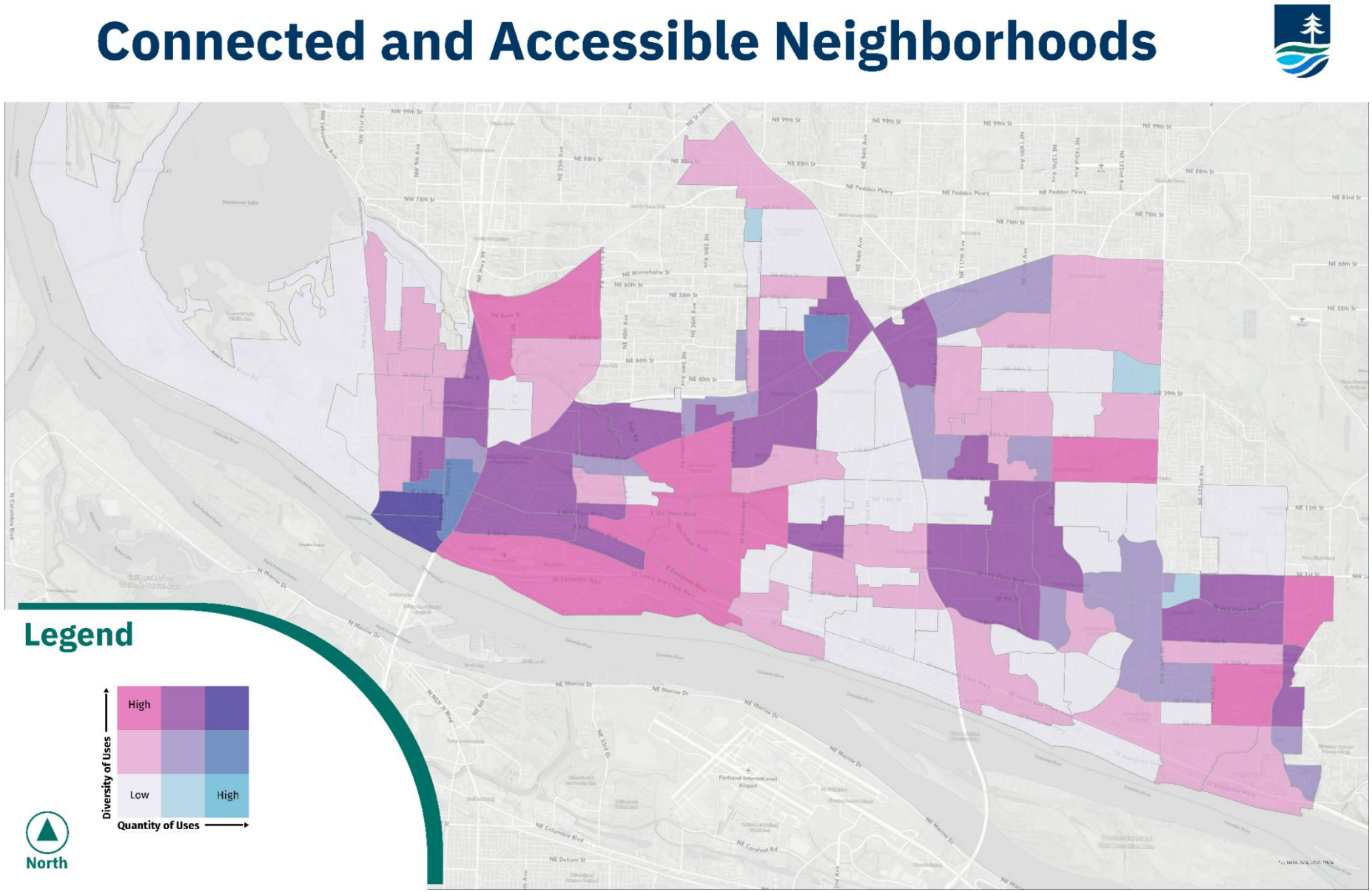
Access to Services

Neighborhoods with a density of essential places, such as schools, childcare, healthcare, social services, and gathering spaces, may be better for health due to improved walkability and easier access to services that support well-being. The concept of a connected and accessible neighborhood aligns with this idea and describes a place where various daily needs can be reached by walking or biking. In Vancouver, some neighborhoods could be considered connected and accessible neighborhoods while others have a much lower proximity to and diversity of amenity types (Exhibit 3-16). This includes essential uses, like grocery stores, urgent care, public schools, and bus stops, and supportive uses, like cafes, community centers, libraries, and trade schools. Neighborhoods with lower amenity access scores include Fruit Valley, Rose Village, and several areas immediately to the west of I-205 and on the east side of the city.

Childcare is one specific type of essential service with varying factors that affect access. Clark County Public Health is conducting the multi-phase Raising Clark County project to identify community support needs for infants, young children, parents, and caregivers. The first phase of the project has found that "families struggle with navigating the complexities of finding a child care center that is available, affordable, reliable, and safe." (Clark County, 2024). Challenges include the high cost of childcare, long wait lists, childcare gaps during holidays and seasonal breaks, program quality, and outdated provider lists. These challenges extend far beyond simply the proximity of childcare to families and their homes and are more likely to be addressed through programs than built environment interventions.

Many Vancouver residents also need access to social services, and transportation to and from these services is a key issue. A Community Needs Assessment survey conducted by Clark County in 2024 found that getting to services, such as housing, physical health, behavioral health, and support services, was among the top barriers to social services access for respondents in Vancouver (Clark County, 2024).

Exhibit 3-16: Connected and Accessible Neighborhoods (Diversity and Quantity of Uses)



Source: City of Vancouver, 2025.

Social Connection and Isolation

There is an epidemic of loneliness and isolation across the United States, according to the U.S. Surgeon General (U.S. Surgeon General, 2023). Connection with others is critical to health and wellbeing, and neighborhoods play a role in facilitating that connection. Physical elements, like schools, libraries, parks, and other places that bring people together, can strengthen our relationships with one another by providing places to meet and interact.

According to 2022 American Community Survey estimates, 31% of households in Vancouver are people living alone, and 13% of that 31% are older adults (over 65) living alone. These percentages have grown over the past 10 years: in 2012, 30% of households in Vancouver were people living alone and 10% of all households were older adults living alone. According to Washington State Home and Community Services, older adults are particularly at risk for isolation and loneliness (Washington Department of Social and Health Services, 2021).

With almost a third of Vancouver households currently living alone and not experiencing the daily social interactions that come from sharing a home, access to gathering spaces and opportunities for connection is increasingly important. Better access to amenities and parks is likely to enhance social connections and therefore community health (see Exhibit 3-4 and Exhibit 3-16).

In addition to supporting physical spaces for gathering, the City also provides opportunities for connection through programming. The City currently runs recreation and community event programs through the Firstenburg Community Center, serving East Vancouver, and the Marshall/Luepke Center, serving West Vancouver. City recreation programs for adults include sports, fitness, and arts, with additional programs tailored specifically toward older adults. The City also coordinates special events, such as summer concerts and movies, and works with community partners on celebrations for various holidays throughout the year. The Vancouver Community Library, operated by Fort Vancouver Regional Libraries, also has ongoing programs, including book groups and workshops.

Exposure to Health Hazards

- **Exposure to Health Summary:** Air quality is a key issue in Vancouver, especially $PM_{2.5}$ exposure. Water quality, noise, heat, and climate change impacts are also present and can be addressed in part by planning and policy.

Air Quality

Criteria air pollutants (CAPs) are specific pollutants that the US Environmental Protection Agency (EPA) has designated as specifically causing harm to people's health and the environment. They include:

- Particulate matter
  - Fine particulate matter ($PM_{2.5}$)
  - Inhalable particulate matter (PM_{10})
- Ozone (0_3)
- Nitrogen dioxide (NO_2)
- Sulfur dioxide (SO_2)
- Carbon monoxide (CO)
- Lead (Pb)

The Washington State Department of Ecology has identified Vancouver as an overburdened community highly impacted by criteria air pollution (Washington Department of Ecology, 2025). Vancouver was identified because of the elevated levels of $PM_{2.5}$ compared to the rest of the state, and the vulnerability of the community to air pollution impacts due to poverty, linguistic isolation, and unaffordable housing.

Specific pollutants of concern, per a 2023 Ecology report, include short-term (24-hour) $PM_{2.5}$ and cumulative criteria air pollution, which is mostly driven by $PM_{2.5}$, 0_3, and NO_2 (Washington Department of Ecology, 2023). Sources of pollution in Vancouver include wildfire, wood burning, cars, trucks, trains, and port activity. Proximity to the larger city of Portland is also likely an influence. As shown in Exhibit 3-17 and Exhibit 3-18, Vancouver ranks highly for $PM_{2.5}$ and O_3 exposure compared to other places in the state (Washington State Department of Health, 2022). The Ecology report estimates that there are 30 deaths each year associated with $PM_{2.5}$ in Vancouver, with the largest impact on older adults.

Current air quality monitoring in Vancouver includes $PM_{2.5}$ and 0_3. The Washington State Environmental Health Disparities map tool also provides mapping for these pollutants (Washington State Department of Health, 2022). The Vancouver area on average is in attainment with the national ambient air quality standards (NAAQS) for all CAPs but is well above NAAQS levels of $PM_{2.5}$ during severe wildfire events. Even during years with less severe

wildfire events, $PM_{2.5}$ concentrations approach or surpass the Department of Ecology's healthy air goals of 20 µg/m3. During summers when wildfires are not prevalent, O_3 is the dominant CAP as there is more direct sunlight and high concentrations of volatile organic compounds (VOCs) from vehicle exhaust, which react to form ground level 0_3.

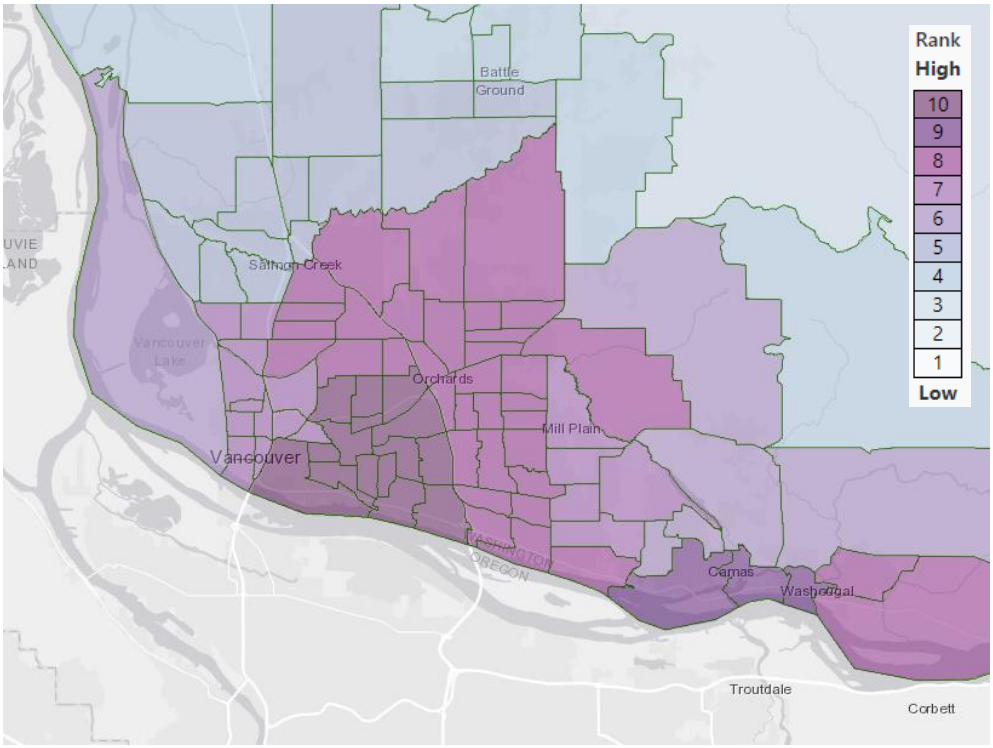
Poor air quality has been directly linked to negative health outcomes in overburdened communities. The following outcomes are more common in overburdened communities and can be linked to high concentrations of criteria pollutants:

- Heart and lung disease at higher rates than state average
- Lower life expectancy than state average
- Older adults in overburdened communities highly impacted by air pollution were twice as likely to die from illnesses linked to breathing fine particles ($PM_{2.5}$) from human-caused sources than the statewide average. Older adult people of color have a higher risk of death from breathing fine particles ($PM_{2.5}$) compared to older white adults in the same area.

There are also multiple sites in Vancouver that the US EPA identifies as brownfields or superfund sites, which have been contaminated by past uses and may pose a hazard to human health and the environment (Exhibit 3-19). Brownfields are properties where contamination is present that could impact future use and the federal government is not typically involved. Superfund sites are those with a typically more hazardous type of contamination and the federal government is involved in cleanup. The EPA provides grants and technical assistance to remediate these contaminated sites. All of the superfund sites in Vancouver have been removed from the superfund national priorities list due to effective cleanup actions. Brownfield sites in the city have varying statuses regarding their cleanup.

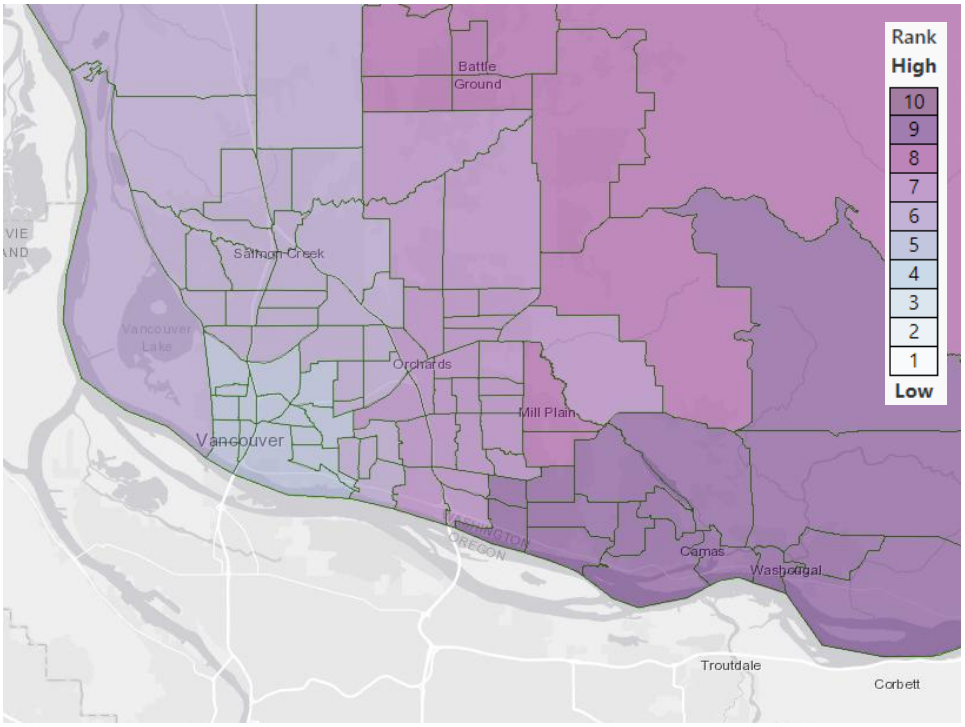
Greater density of trees and plantings is one strategy to mitigate air pollution. Dense tree canopies are prevalent in some residential neighborhoods in Central Vancouver, but overall, Vancouver's tree canopy coverage is significantly lower than the recommended 40%, with only 19% coverage (Exhibit 3-20). This is also lower than other cities in Washington, which maintain an average of 32% coverage. Communities of color in Vancouver experience less tree canopy coverage, falling below the City's average by 2.4% (Design Workshop, 2024). Vancouver aims to achieve a tree canopy coverage of 28% by 2030.

Exhibit 3-17: $PM_{2.5}$ Exposure - Compared to Other Census Tracts in Washington



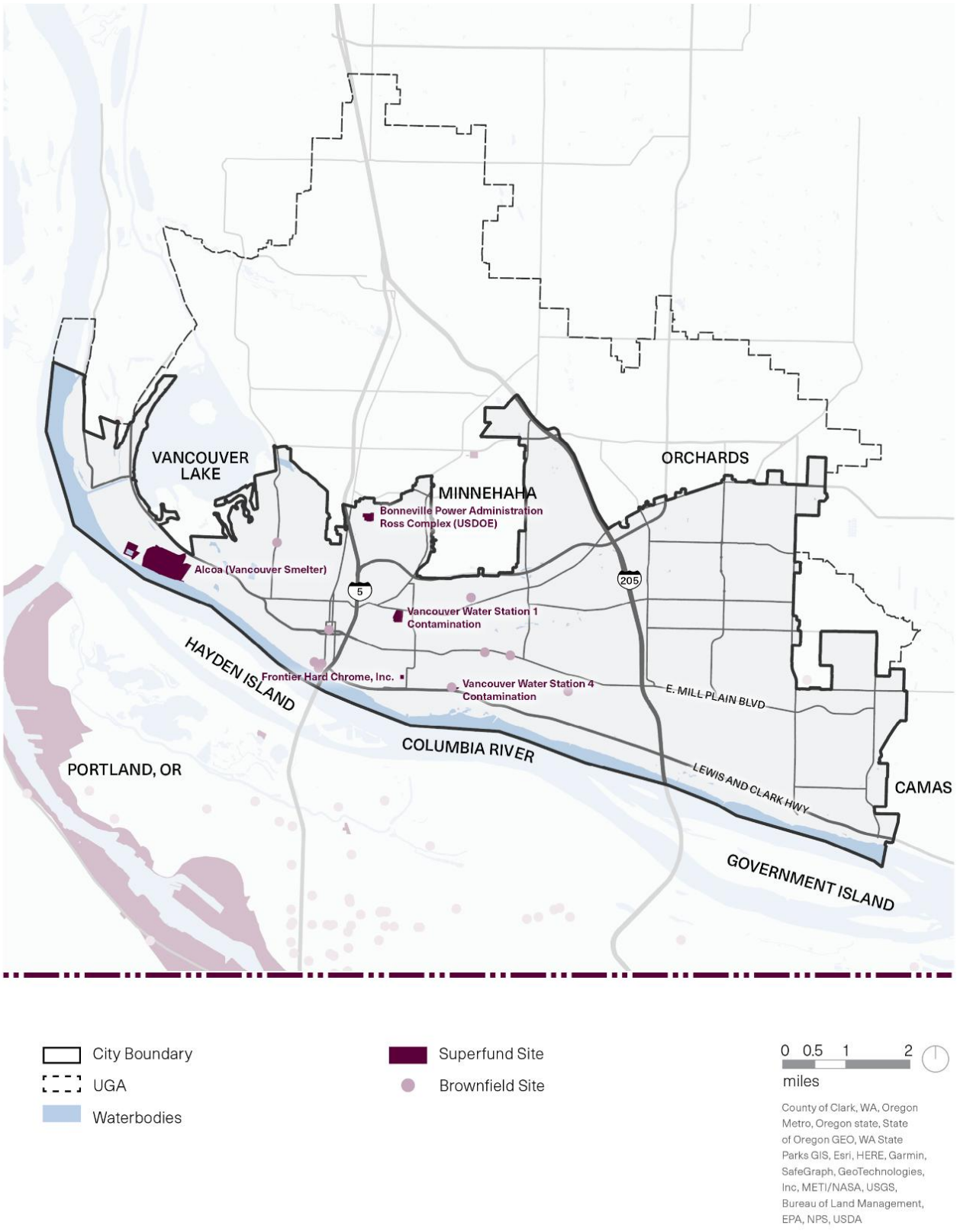
Source: Washington State Environmental Health Disparities Map, 2022.

Exhibit 3-18: O_3 Exposure - Compared to Other Census Tracts in Washington



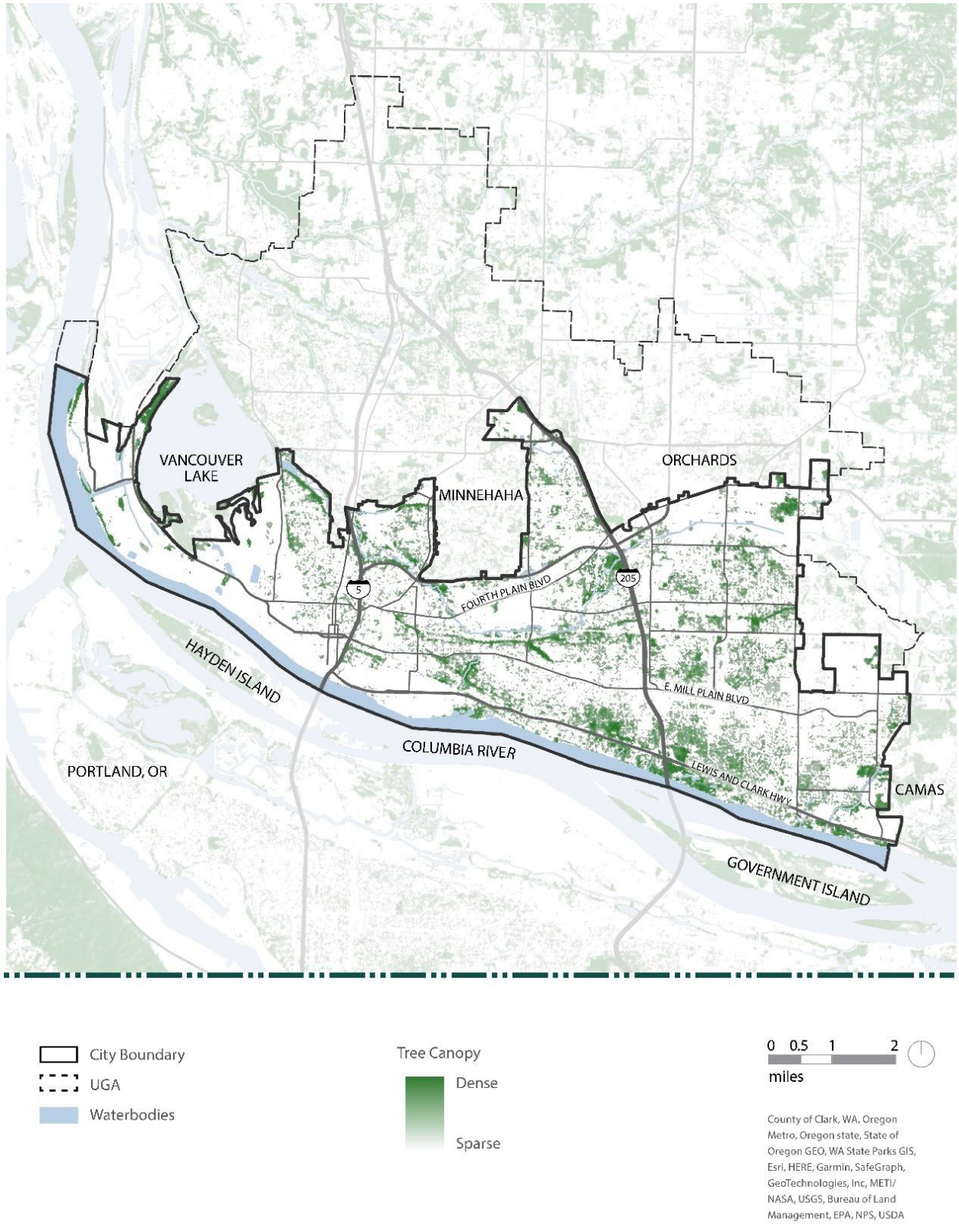
Source: Washington State Environmental Health Disparities Map, 2022.

Exhibit 3-19: Superfund and Brownfield Sites



Source: City of Vancouver Community Atlas, 2024.

Exhibit 3-20: Vegetation



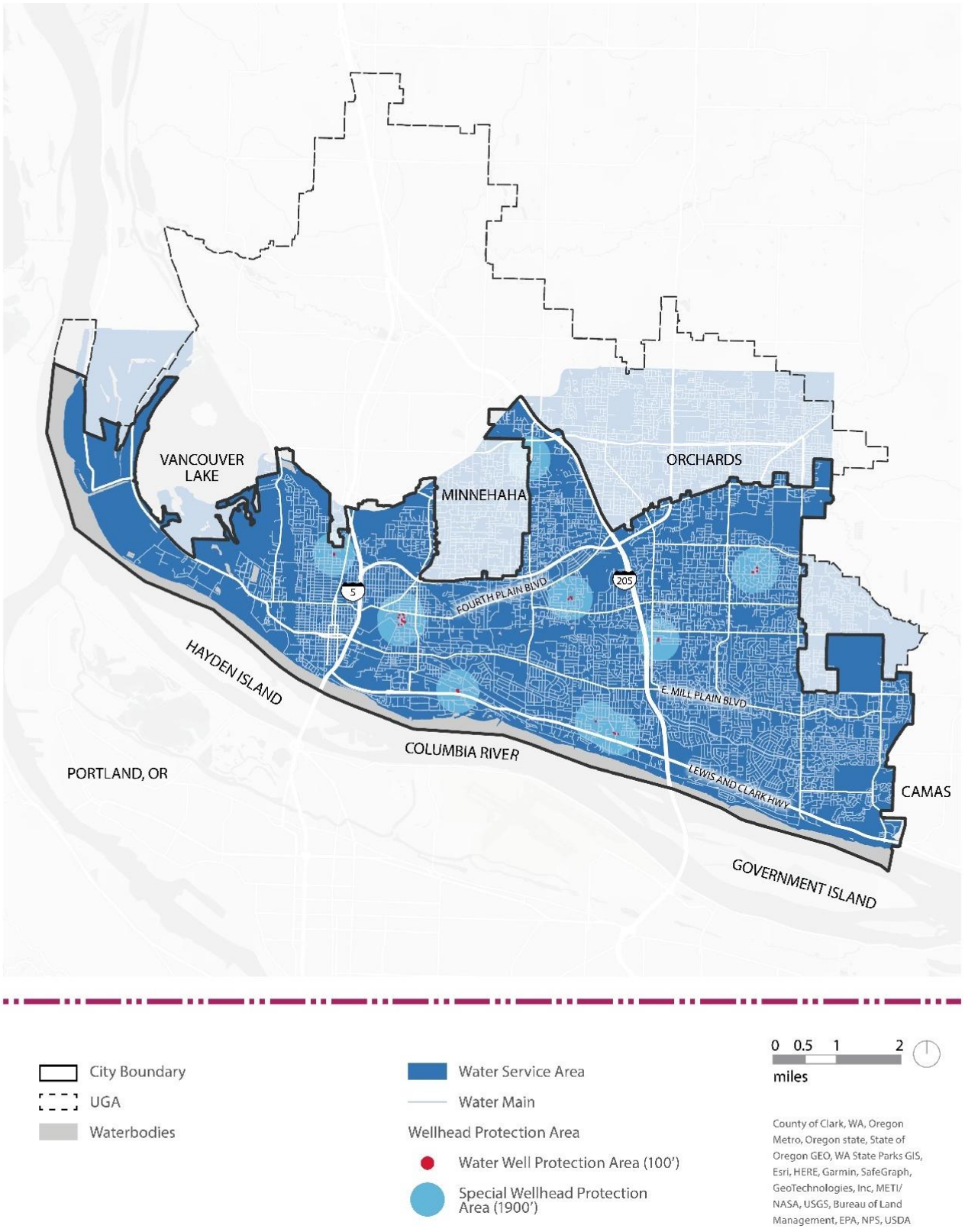
Source: City of Vancouver Community Atlas, 2024.

Water Quality

The City of Vancouver 2023 Annual Water Quality Report examines groundwater and distribution system testing results for select contaminants. Testing of groundwater sources found that the highest levels of fluoride and nitrate were well within the ideal goal limit and the highest level allowed (City of Vancouver, 2023). Within the water distribution system, coliform bacteria was not detected in 2023, but chlorine was slightly higher than the ideal goal. Other contaminants without goals defined were detected at levels far below the highest allowed. The City also conducted sampling for per- and polyfluoroalkyl substances (PFAS), human-made chemicals with links to harmful health impacts. Samples ranged from none detected to levels above the level that the State defines as requiring monitoring and action. The City has a range of ongoing activities to help address PFAS in the city's water, including short-term measures and treatment projects in long-range capital facilities plans. Vancouver also has eight wellhead protection areas located throughout the city (Exhibit 3-21).

Overall, based on 2023 testing results, chlorine but especially PFAS may be the greatest contaminant risks to the water quality in Vancouver.

Exhibit 3-21: Potable Water



Source: City of Vancouver Community Atlas, 2024.

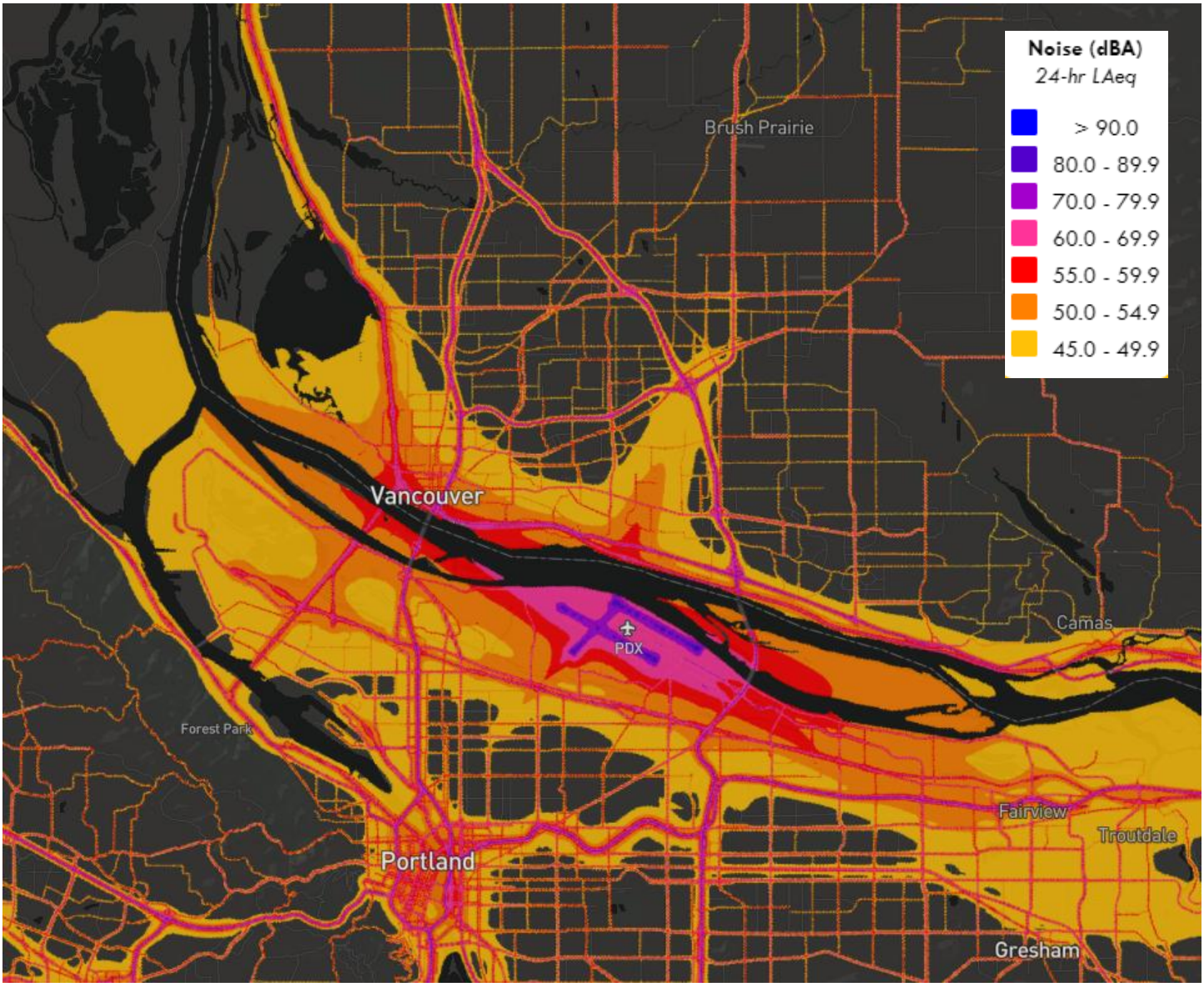
Ambient Noise

According to the American Public Health Association, chronic noise can have a range of impacts on sleep and stress levels that can contribute to cardiovascular disease, psychological disorders, and other health conditions (American Public Health Association, 2021). In an urban environment, noise can come from a range of sources, such as construction, industrial uses, and transportation. Washington State defines maximum permissible noise as between 55 and 70 A-weighted decibels (dBA), depending on the uses that are creating and receiving the noise (Washington Administrative Code, 1975).

The US Department of Transportation provides national data on transportation noise (Exhibit 3-22) (U.S. Department of Transportation, 2020). In Vancouver, much of this noise is centered around the Portland International Airport to the south, the rail lines on the west and south ends of the city, and major roads and highways, including I5, SR14, SR205, and SR500.

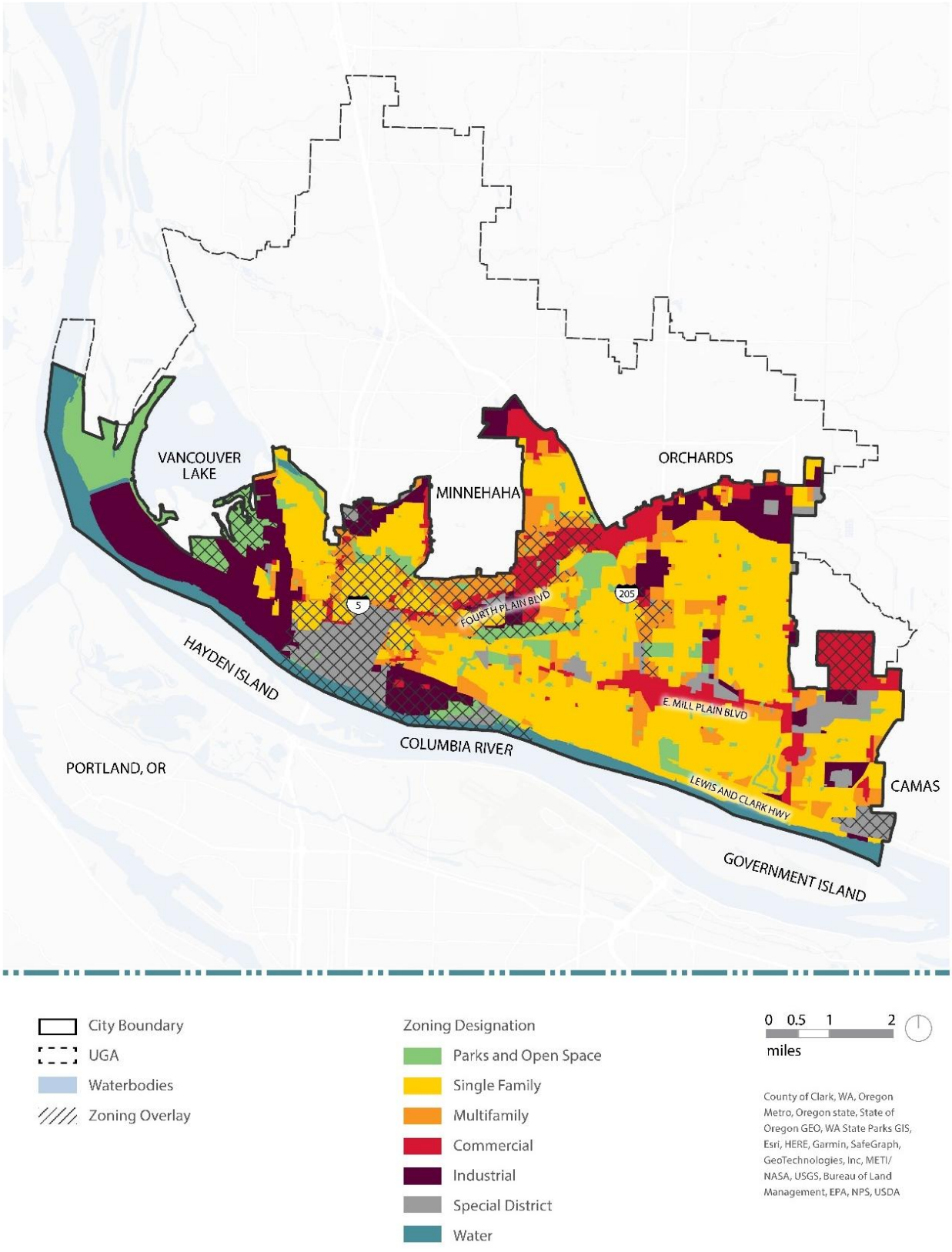
Noise impacts from construction can occur anywhere in the city, whereas noise from industrial uses is most likely to occur in industrial zones, located primarily near the edges of city limits. There are several areas of the city where industrial zones abut residential zones, where homes may be especially at risk for noise exposure, such as on the west side around Fruit Valley, near the Vancouver waterfront south of SR-14, and in the northeast corner of the city (Exhibit 3-23).

Exhibit 3-22: Transportation Noise



Source: U.S. Department of Transportation, 2020.

Exhibit 3-23: Zoning



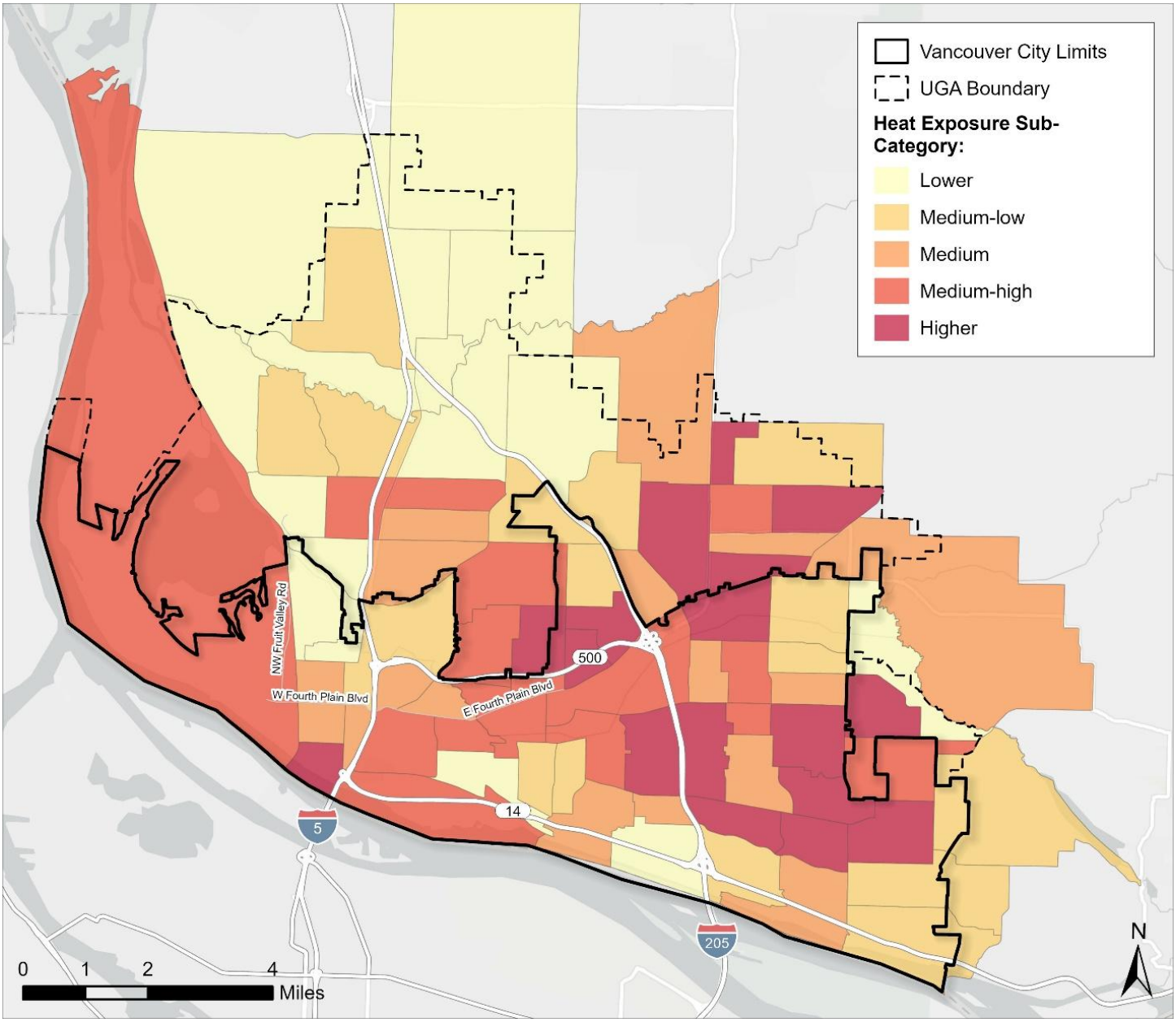
Source: City of Vancouver Community Atlas, 2024.

Urban Heat

According to the World Health Organization (WHO), heat stress is the leading cause of weather-related deaths, and can also exacerbate health conditions such as cardiovascular disease, diabetes, asthma, and mental health (World Health Organization, 2025)

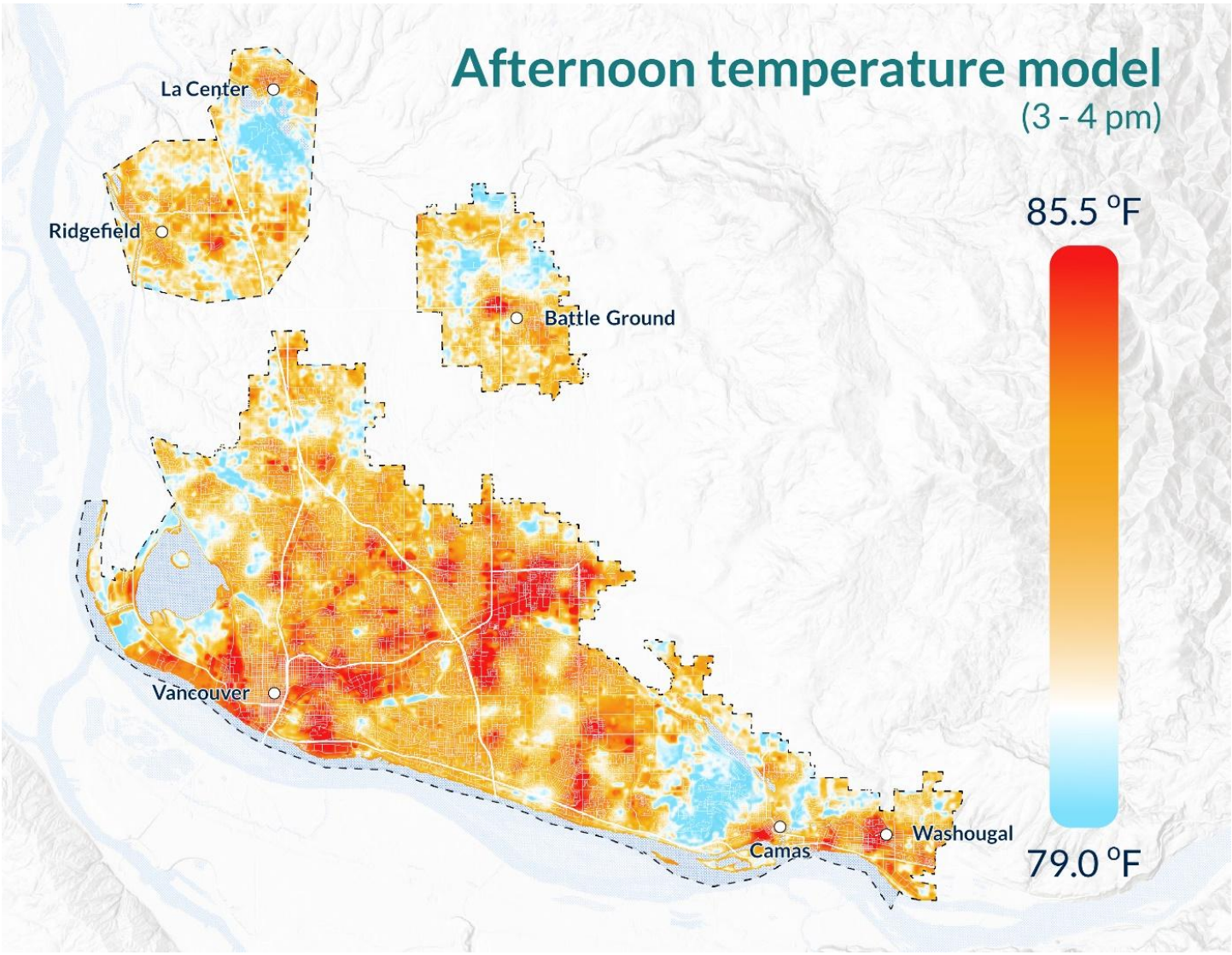
As part of climate change resilience work in 2024, a heat exposure index was created to understand summer heat differences across Vancouver (Exhibit 3-24). Block groups with greater heat exposure are found across the city, generally in areas with more impervious surfaces. Clark County has also conducted a Heat Watch project, collecting point-in-time temperature data on July 12, 2024 (Exhibit 3-25). In their afternoon readings, there was a difference of more than 6 degrees Fahrenheit in different locations. Hotter temperatures were found in the Fruit Valley, Rose Village, and Fourth Plain areas, and areas with large amounts of surface parking and other impervious surfaces across the city, such as industrial parks, office parks, shopping centers, and the VA and PeaceHealth hospitals.

Exhibit 3-24: Heat Exposure Index



Source: BERK, 2024.

Exhibit 3-25: Clark County Heat Watch Map

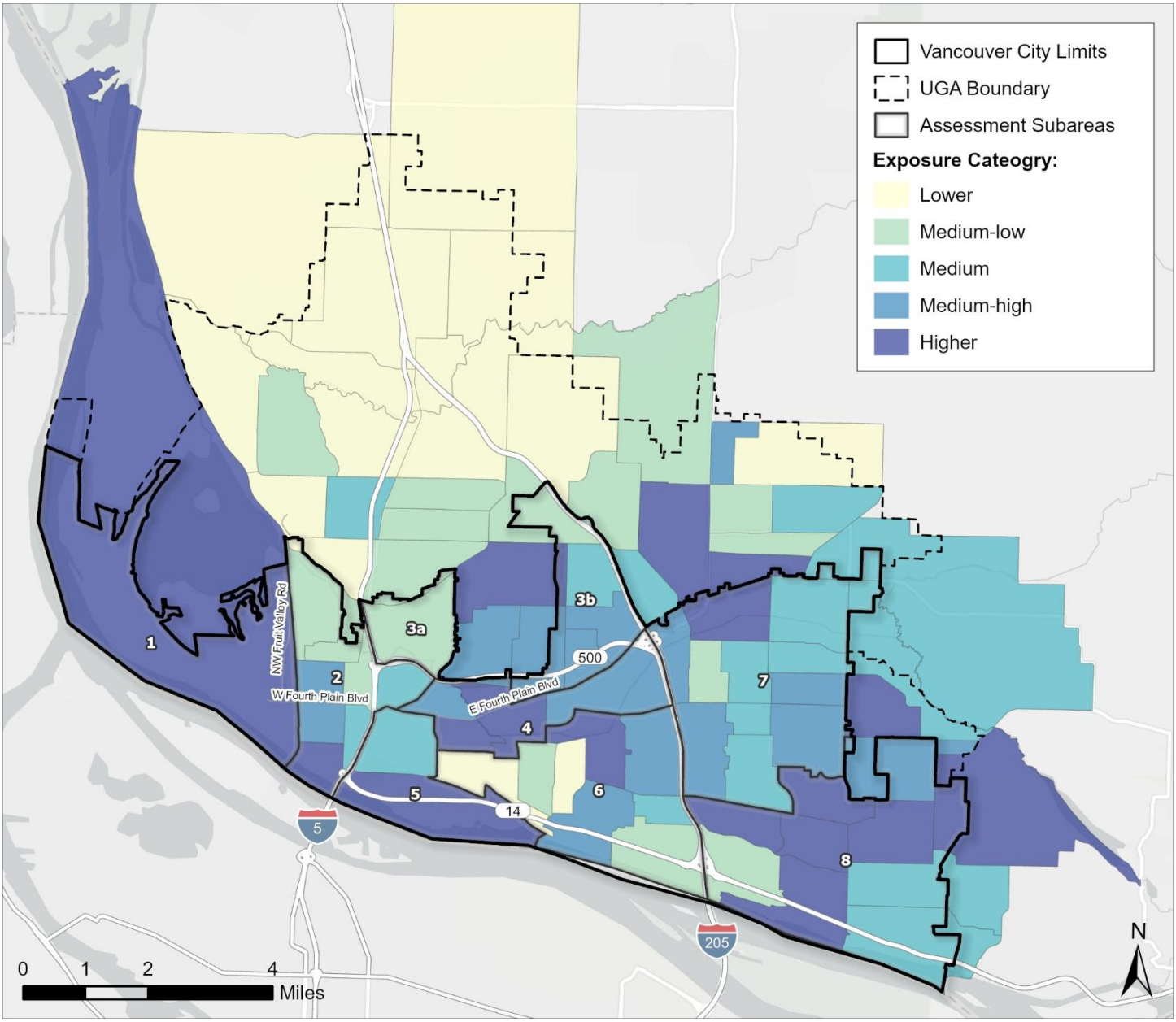


Source: Clark County, 2024.

Exposure to Climate Impacts

The City's 2024 Climate Exposure Index, created as part of the **OUR VANCOUVER** Comprehensive Plan periodic update, uses data from a variety of sources to create a score for each Census tract (BERK Consulting, 2024). This score represents a tract's combined exposure to heat, precipitation, flooding, smoke, air quality, and fire. Areas with the highest scores have the most potential exposure to climate impacts. High exposure areas primarily include areas along the Columbia River, in and around Fourth Plain Village, and on the east side of the city around major corridors (Exhibit 3-26).

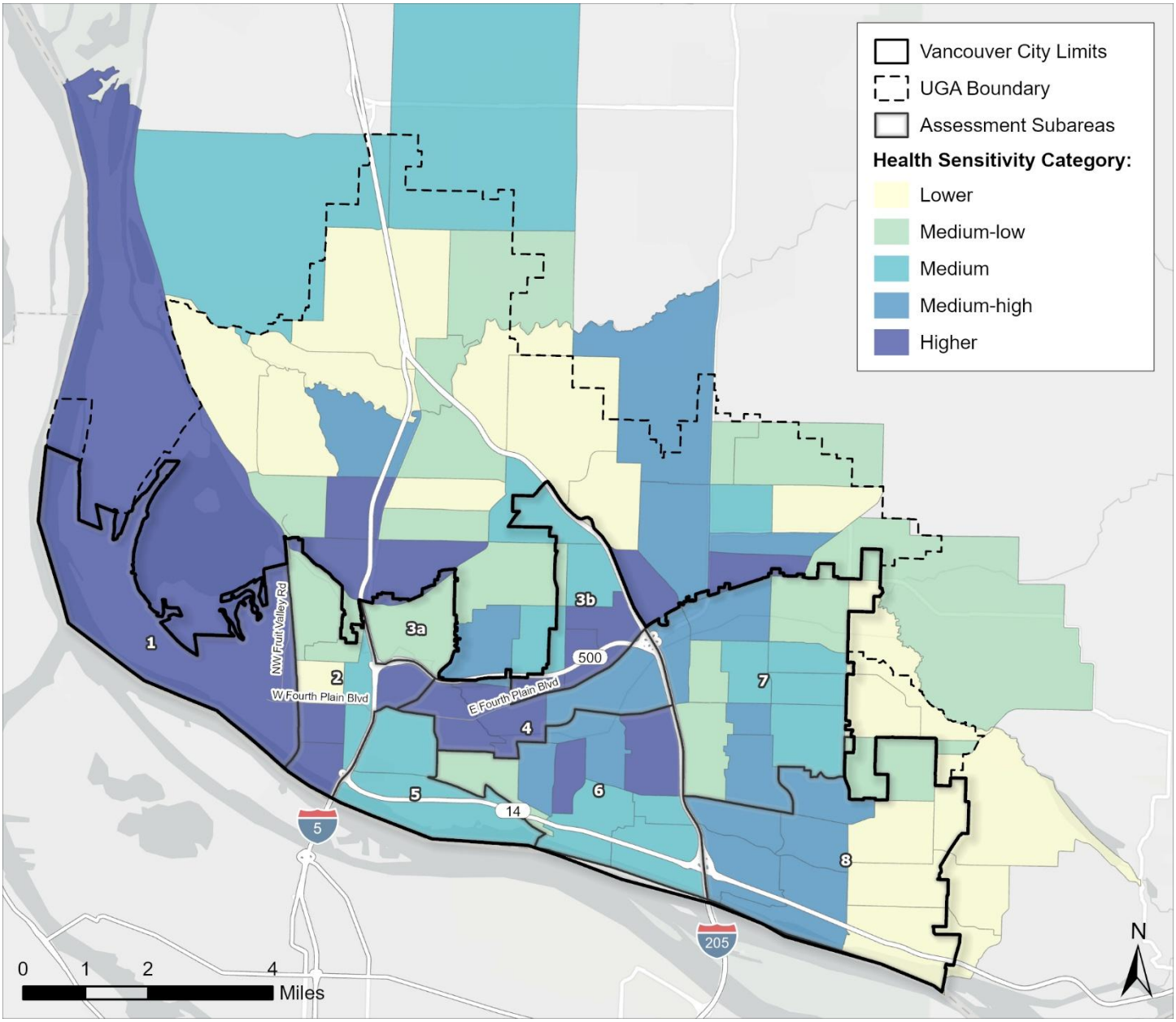
Exhibit 3-26: Climate Exposure Index



Source: BERK, 2024.

A separate Health Sensitivity to Climate Index was created as part of the same effort. It combines metrics around health insurance access, asthma, coronary heart disease, COPD, diabetes, poor mental health, and poor physical health to create a health sensitivity score. Higher scores indicate higher instances of health concerns (Exhibit 3-27). Areas with health sensitivity are similar to those exposed to climate hazards.

Exhibit 3-27: Health Sensitivity to Climate Index

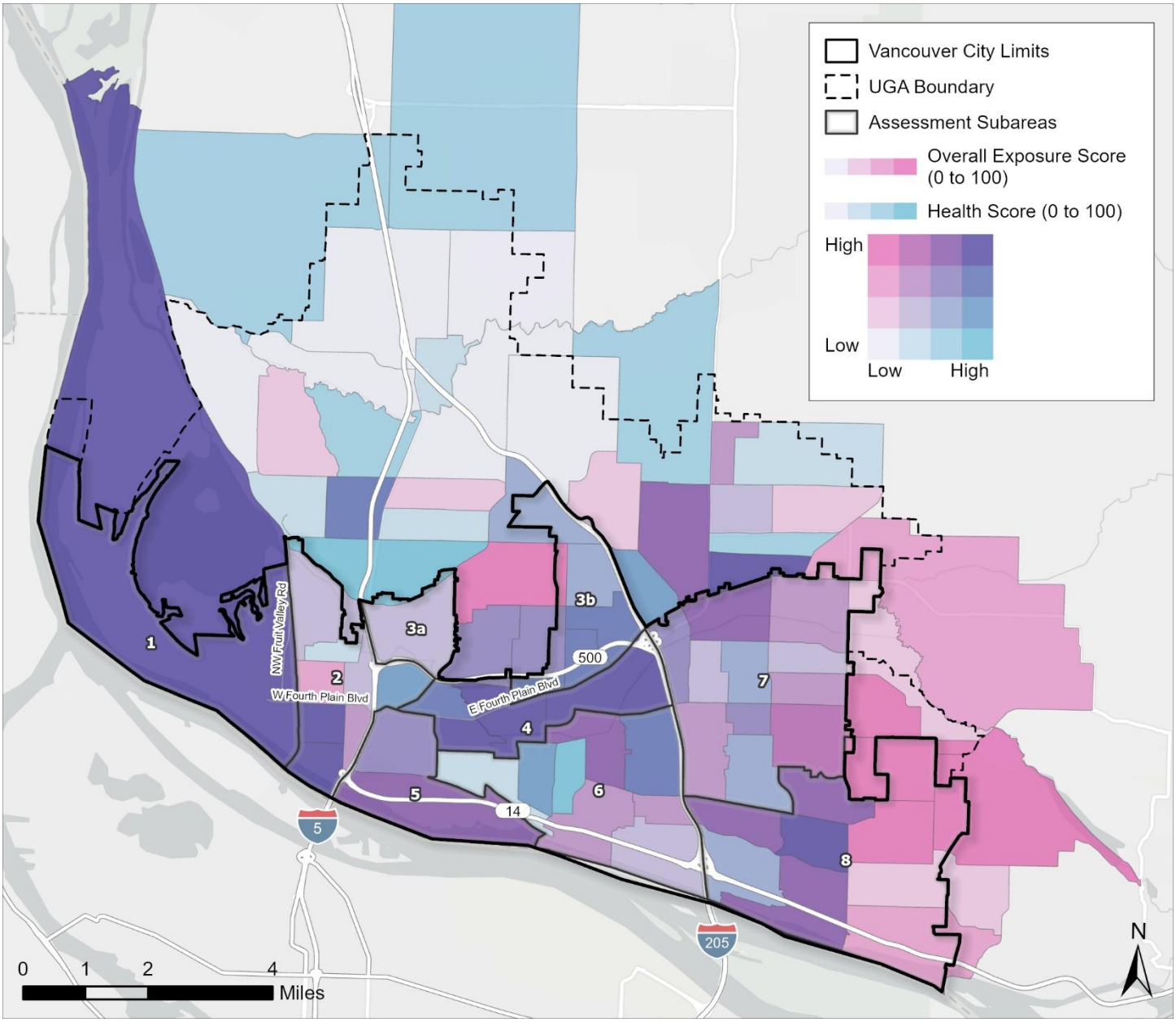


Source: BERK, 2024.

When combined, areas of particular vulnerability include areas along the Columbia River and downtown, in and around Fourth Plain Village, and on the east side of the city around major corridors (Exhibit 3-28).

A full Climate Vulnerability Assessment will be published with the Comprehensive Plan periodic update in addition to this HIA.

Exhibit 3-28: Climate Exposure Index X Health Sensitivity to Climate Index



Source: BERK, 2024.

Housing and Financial Security

- **Housing and Financial Security Summary:** Affordability and displacement are pressing issues for health, and a quarter of Vancouver's housing stock may also have exposure to hazards like lead. About 1 in 8 households is living below the federal poverty level and average wages are especially insufficient for single parents.

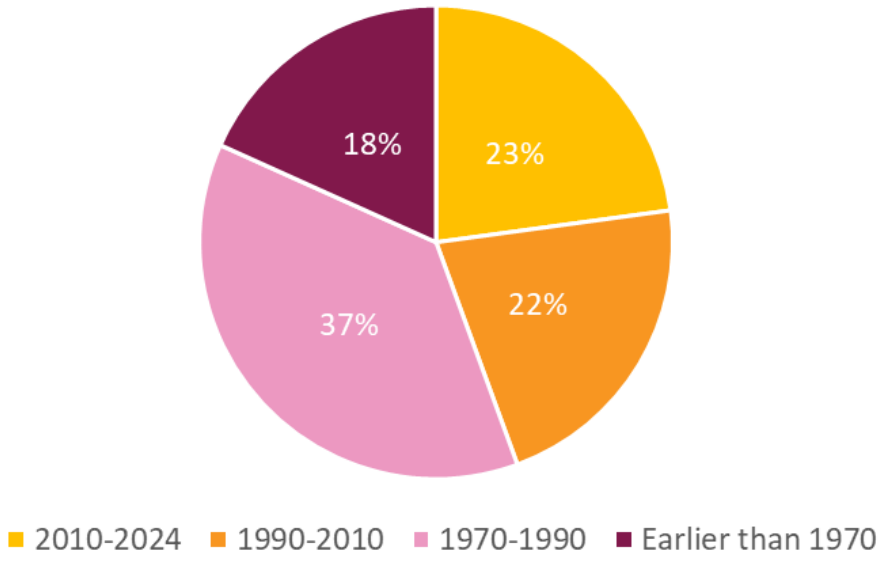
Safe and Healthy Housing

There are many factors that may contribute to the safety and health of a housing unit. Two measures include the age of the building and radon exposure risk.

While older housing units are not necessarily unsafe or unhealthy to live in, the age of a home can be used as a proxy for lead exposure from lead-based paint. Homes built before 1978 are likely to have lead-based paint, according to the Washington State Department of Health (Washington State Department of Health, 2025). In Vancouver, approximately 25% of units were built before 1978 (Clark County, 2025).

Age of housing stock can also act as a proxy for quality, as aging homes need more investment in maintenance to continue being safe and healthy. More than half of all housing units in the city were built prior to 1990, and 18% were built before 1970 (Exhibit 3-29).

Exhibit 3-29: Housing - Year Built

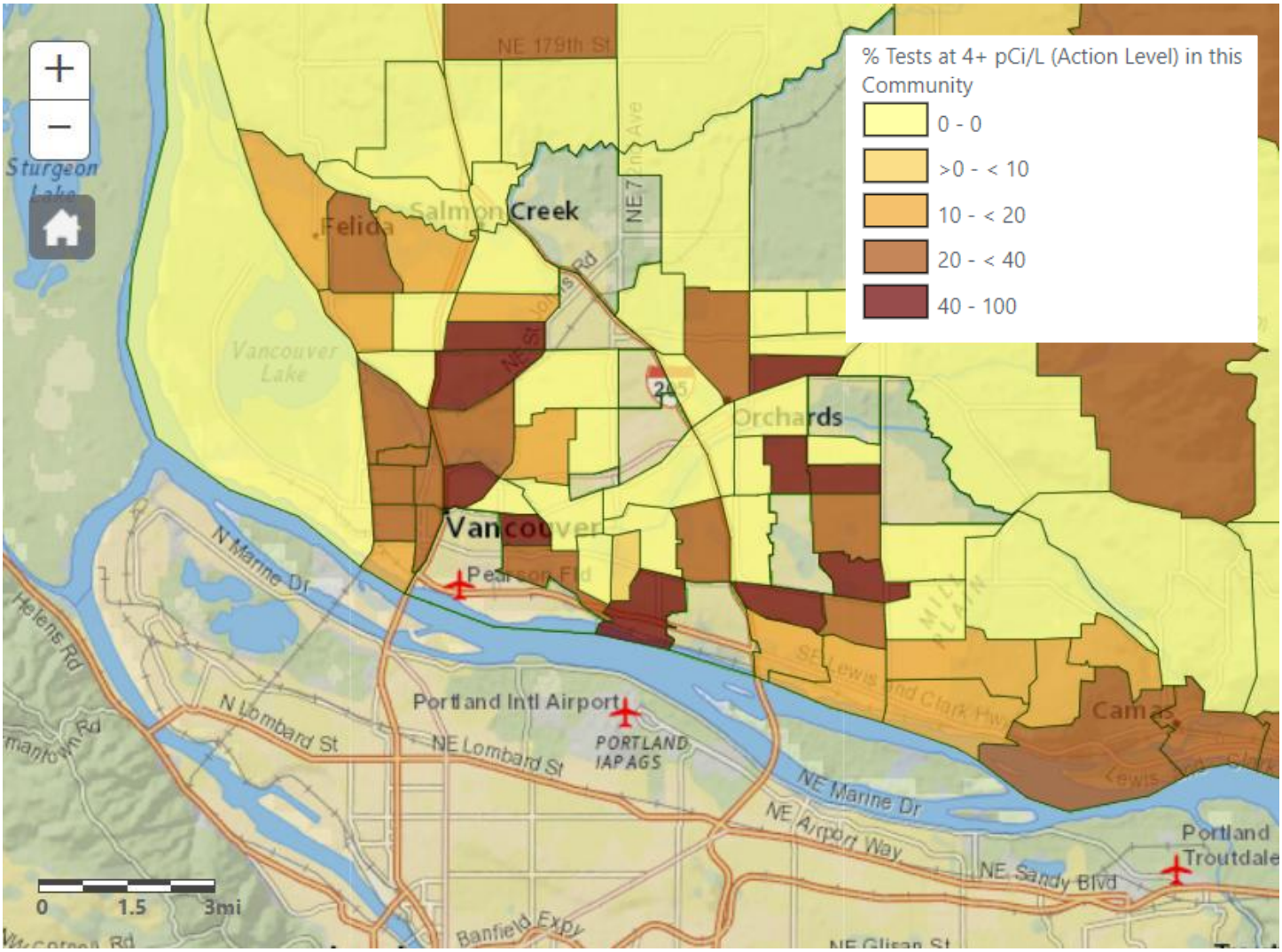


Source: Clark County, 2024; BERK, 2024.
Note: Based on "effective year built," which is adjusted for major renovations.

Another factor for housing health is radon exposure, which is the leading cause of lung cancer among nonsmokers and contributes to higher rates of lung cancer for smokers (Washington State Department of Health, 2025). Radon is a colorless, odorless gas that can seep into homes and become trapped and concentrated. All types of homes can be affected, regardless of age or whether they contain a basement. However, there is a lower risk in homes above the third floor, and therefore the EPA recommends testing all residences below the third floor (National Center for Healthy Housing, 2025). New homes can also be built with radon-resistant features.

According to the Washington State Department of Health, radon testing in Vancouver has reported varying results in different parts of the city, with clusters near the west, south, and east edges (Exhibit 3-30) (Washington State Department of Helath, 2019).

Exhibit 3-30: Radon Testing



Source: Washington Tracking Network, 2019.

Affordable Housing and Displacement

Housing instability is considered a social determinant of health by the United States Department of Health and Human Services, as it can have negative impacts to physical health and make it harder to access health care (U.S. Department of Health and Human Services, 2025). Housing instability can also lead to frequent moves, evictions, and homelessness, all of which are also associated with impacts on mental and physical health.

Housing costs have rapidly increased in Vancouver over the past decade, with median home prices nearly tripling and average rents increasing 60% between 2012 and 2023 (City of Vancouver, 2024). Incomes have not been rising proportionately to the rising costs of housing. Cost burden tends to be higher for renters compared to homeowners: 53% of renters

are rent-burdened (U.S. Census Bureau, 2023). This high cost of housing may affect households' ability to meet other daily needs or save for emergencies. The City's Affordable Housing Fund sponsors 1,242 rent-restricted affordable units, of which 26% are set aside for seniors.

More than 1,700 new housing units are needed per year to meet housing needs as the population grows between 2023 and 2045. Many of these units are needed for households with incomes below 80% Area Median Income (AMI), as shown in Exhibit 3-31.

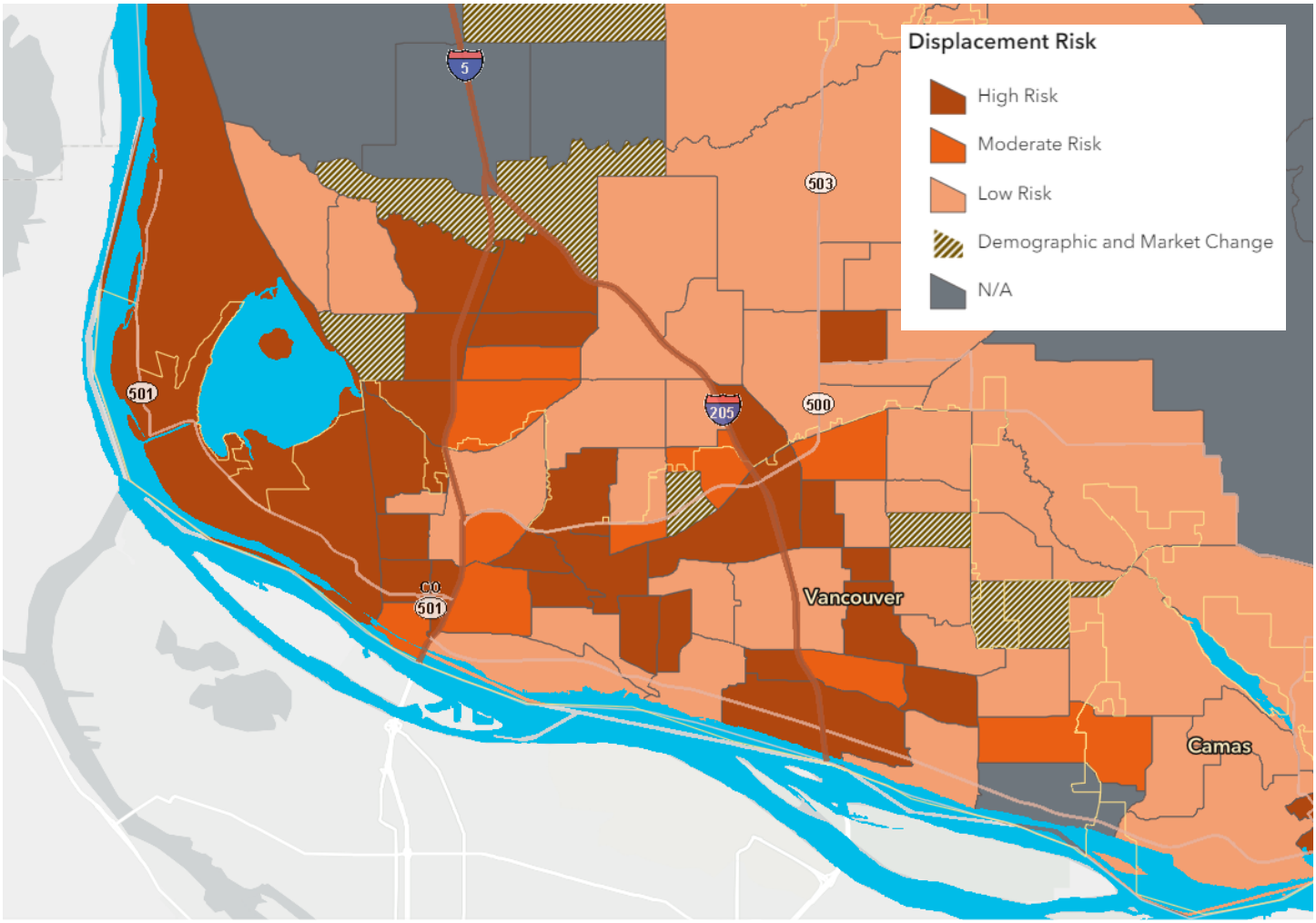
Exhibit 3-31: Housing Unit Targets by Income Band (2023-2045)

Household Type	Unit Need (2023-2045)
Emergency Shelter	1,374 (shelter beds)
Permanent Supportive Housing (PSH)	2,651
Below 30% AMI	4,371
30-50% AMI	5,890
50-80% AMI	5,788
80-100% AMI	3,351
100-120% AMI	3,175
120%+ AMI	12,902

Source: City of Vancouver, 2024.

Displacement of existing households is a concern in Vancouver: as rents and housing prices rise and development interest increases, residents are at risk of having to leave their homes and communities for lower-cost areas. The stress associated with being displaced can have negative health impacts. The City has identified Central Vancouver as particularly vulnerable, due to high rates of households with low incomes and renter households (City of Vancouver, 2025). The Washington State Department of Commerce has also published a displacement risk map, which shows areas on the west, north-central, and east sides of the city as being high risk based on market trends, demographic change, and social vulnerability (Exhibit 3-32) (Washington State Department of Commerce, 2024).

Exhibit 3-32: Displacement Risk



Source: Washington State Department of Commerce, 2023.

The City developed an anti-displacement plan in 2023, Reside Vancouver, which includes goals and recommendations to mitigate displacement through preservation, production, protection of people from eviction and discrimination, and financial prosperity (City of Vancouver, 2025).

Income and Living Wage Jobs

The unemployment rate in Vancouver is low, at approximately 5.6% (U.S. Census Bureau, 2023). However, approximately 11% of the population is living below the poverty level. Rates are much higher for Black or African American residents (21%) and Native Hawaiian and Other Pacific Islander residents (19%).

A living wage job is one where an individual can work full time and cover their household's basic cost of living. Statewide, the family living wage job, or a job with healthcare benefits that is sufficient for raising a family, is defined at $23 per hour (Revised Code of Washington, 2022).

Massachusetts Institute of Technology (MIT)'s living wage calculator estimates that, in Clark County, for a household with two working adults and two children, both adults must be making an average of $29.59 per hour to make a living wage, or $61,500 per adult (combined income of approximately $123,000) (MIT, 2025). A living wage for a single parent with one child is much higher per earner, at $43.16 per hour or $90,000 annually. For a single adult with no children, the living wage is $26.24 or approximately $55,000 total per year. Actual living wage numbers in Vancouver are likely to be higher than for the county as a whole.

The average annual salary in Clark County per the Washington State Employment Security Department (in industries covered by unemployment insurance) is $68,000. This average is above the living wage for a single working adult, or two working adults with two children, but is $22,000 short of a living wage for a single parent of one child.

Among the highest-paying industries are the management of companies and enterprises; finance and insurance; information industries; professional, scientific, and technical services; and wholesale trade. Lowest paying industries include accommodation and food services; arts, entertainment, and recreation; educational services; retail trade; agriculture, forestry, fishing, and hunting; and administrative and waste services (Exhibit 3-33). Vancouver's economy has been changing and professional and creative class jobs have been growing, making the city less dependent on traditional manufacturing industries to drive growth (EcoNorthwest, 2024).

Exhibit 3-33: Industries and Wages (Q3 2024)

2-digit NAICS	Industry subsectors	Average employment	Average weekly wage	Estimated annual wage
52	Finance and insurance	6,608	$2,213	$115,076
55	Management of companies and enterprises	3,734	$2,203	$114,556
51	Information	3,716	$2,112	$109,824
54	Professional, scientific, and technical services	10,856	$2,031	$105,612
NEC	NOT ELSEWHERE CLASSIFIED	159	$1,912	$99,424
42	Wholesale trade	7,110	$1,720	$89,440
GOV	GOVERNMENT	26,819	$1,585	$82,420
23	Construction	18,324	$1,521	$79,092
31-33	Manufacturing	14,226	$1,490	$77,480
48-49	Transportation and warehousing	3,533	$1,416	$73,632
62	Healthcare and social assistance	30,825	$1,358	$70,616
53	Real estate and rental and leasing	3,146	$1,202	$62,504
56	Administrative and waste services	9,473	$1,118	$58,136
81	Other services, except public administration	5,718	$1,050	$54,600
11	Agriculture, forestry, fishing and hunting	576	$963	$50,076
44-45	Retail trade	18,894	$836	$43,472

61	Educational services	1,763	$724	$37,648
71	Arts, entertainment, and recreation	2,828	$716	$37,232
72	Accommodation and food services	15,729	$593	$30,836
21	Mining	Not available	Not available	Not available
22	Utilities	Not available	Not available	Not available
TOTAL	Total	184,038	$1,375	$71,500

Source: Washington State Employment Security Department, 2024.

The Columbia River Economic Development Council (CREDC), serving Clark County, is focused on five strategic sectors, including software, computers and electronics, clean tech, life sciences, and technology enhanced production, which are industries that tend to have higher wages than the average (CREDC, 2025). The 2018-2023 Clark County Comprehensive Economic Development Plan outlines strategies for supporting these sectors, through becoming industry experts, strategically marketing industry clusters, and building a startup ecosystem (CREDC, 2024). The plan also defines strategies for supporting people in skills development, preparing youth for economic opportunity, attracting emerging talent, and promoting equity, diversity, and inclusion. CREDC has an objective to support economic opportunity in Vancouver, specifically, by supporting incentives, considerations for parking and transportation needs, arts and culture, efforts to improve downtown's appearance, and multi-family housing.

The ratio of debt to income is one measure of a household's ability to meet basic needs and build financial wellbeing. According to 2023 data from the United States Federal Reserve, the debt-to-income ratio in Clark County was 2.6, higher than the state average of 1.7 (Federal Reserve, 2024). While there are many factors that affect a household's debt and income, the primary way that the City can address this through land use is to facilitate the conditions for higher-paying industries to expand and create more job opportunities. Policies that help create connected and accessible neighborhoods, as discussed in the Community Connections section above, may also help reduce debt by minimizing the need for a car: 28% of Clark County residents have auto loans (Urban Institute, 2024). Affordable housing policies, as discussed above, could also reduce housing cost pressure and lessen household reliance on borrowing funds, whether in the form of actual housing debt or debt for emergencies and daily needs.

Key Findings and Implications

This section described the current context regarding population and health outcomes, physical activity, food access, community connections, exposure to health hazards, and housing and financial security in Vancouver. Chapter 5 builds on these findings to examine the three growth alternatives and includes recommendations to address health disparities as the city grows.

Population and Health Outcomes

Heart disease, respiratory diseases, and diabetes account for a high number of adult deaths in Vancouver. These diseases may be improved or prevented through physical activity, nutrition, and air quality, which Vancouver can support through planning.

Vancouver's population varies widely in terms of demographics and socioeconomic characteristics. Equity Index mapping suggests areas around Fruit Valley, Rose Village, Fourth Plain Village, and Mill Plain Boulevard have the greatest equity disparities.

Physical Activity

Access to parks and active transportation varies across the city. Priority areas for future park investment based on existing access and equity risk scores include Fruit Valley, Rose Village, Fourth Plain Village, and several other block groups across the city. Walkability in terms of proximity to destinations is strongest near downtown and along major corridors, and many of the vehicle trips from these areas are under 5 miles. These indicate opportunity areas for further bicycle and pedestrian infrastructure.

Food Access

Many households in Vancouver face food insecurity, with more than 15% receiving SNAP support and almost half of students receiving free and reduced lunch. Some parts of the city do not have any supermarkets within a mile. Food banks are distributed across the city and there are several community gardens and two farmers markets that also provide residents with access to food.

Community Connections

Access to amenities is greater in some parts of Vancouver than others: Fruit Valley, Rose Village, and several areas immediately to the west of I-205 and on the east side of the city have fewer amenities and diversity of amenities within walking distance. Challenges with access to childcare and access to social services are also present throughout Vancouver.

Exposure to Health Hazards

Air quality is a hazard of particular concern in Vancouver due to elevated levels of $PM_{2.5}$ compared to the rest of the state. Heat islands are also present, particularly in areas with large amount of surface parking and other impervious surfaces. Tree canopy, which can mitigate air quality impacts and heat, varies significantly across Vancouver, with 19% cover on average for the whole city. Noise is also an issue around major roadways, rail lines, and the Portland International Airport. Vancouver is expected to see impacts from climate change, including heat, extreme precipitation and flooding, and smoke.

Housing and Financial Security

Approximately a fifth of housing units in Vancouver were built prior to 1970, which may correspond with exposures to substances such as lead and other housing quality concerns. Radon testing has also revealed several areas of concern.

Housing costs are rising rapidly, and housing cost burden affects a large amount of residents, especially renters. Displacement is a concern as prices rise and development interest increases, with varying risk levels across Vancouver. The average annual salary in the city is above the living wage for households without children and two-parent households but is below the living wage for single-parent households. 12% of the population is living below the poverty line, and rates are much higher for Black or African American residents and American Indian and Alaska Native residents. Overall, debt-to-income ratio is much higher in Vancouver than the state average.

Policy Audit

There are several existing policies in the City's adopted Comprehensive Plan that relate to health (City of Vancouver, 2011). Some key policies include:

- CD-15 Public Health and the built environment
  Promote improved public health through measures including but not limited to the following:
  - (a) Develop integrated land use and street patterns, sidewalk and recreational facilities that encourage walking or biking
  - (b) Recruit and retain supermarkets and other stores serving fresh food in areas otherwise lacking them. Discourage supermarkets and fresh food stores that do relocate from using non-compete clauses that prevent timely replacement of similar uses. Encourage stores that locate near sensitive populations or underserved areas to offer healthy food choices
  - (c) Assess and promote opportunities for growing food in home or community gardens. Consider guidelines for service provision levels.

    - (d) Coordinate with Clark County Public Health to better integrate health impacts and land use and public facilities and service planning
- CD-17 Aging Populations
  Update policies, standards, and practices as necessary to accommodate anticipated aging of the local population, though measures such as:
    - (a) Develop integrated land use patterns and transportation networks that facilitate shorter vehicular trips, walking, or use of public transportation
    - (b) Review standards for specialty housing to ensure they are consistent with anticipated age-related housing needs
    - (c) Review standards and designations of conventional single and multi-family housing to ensure they are consistent with anticipated needs, including provisions for aging in place
    - (d) Review standards for roads and sidewalk design, signage, and lighting to address senior safety issues
- H-6 Special needs housing
  Facilitate housing for special needs populations dispersed throughout Vancouver and the region. Such housing may consist of residential-care facilities, shelters, group homes, or low-income housing, and should be located near transportation and other services such as health care, schools, and stores.

These policies address several key health topics, including food access, physical activity, community connections, and housing and financial security.

The Vancouver Climate Action Framework (2023), Vancouver Climate Adaptation Strategy (2022), and Clark County Natural Hazard Mitigation Plan (2023) also include policies relevant to exposure to health hazards, food access, and housing and financial security:

- Climate Action Framework
    - Strategy EQ-2
        - Build a more community-driven, circular economy. Reduce the carbon footprint of goods and services by building a community-driven economy to promote the reduction, reuse, and repair of goods and materials and expand downstream markets for waste products.
        - Work with City economic development partners to support small- and mid-sized businesses in the transition to a local, green economy that ensures equitable distribution of benefits and impacts.
        - Conduct outreach and provide resources to residents, business, schools, and community partners to improve our food system by limiting waste, promoting low carbon diets, expanding community gardens and markets, and securing surplus food to food-insecure
    - Strategy BE-1
        - Increase use and storage of renewable energy while reducing consumption

    - Work with Clark PUD to procure renewable energy ahead of Clean Energy Transformation Act (CETA) mandates and increase community-wide renewable electricity supply to 100%. Exceed state requirements for building efficiency. Work with businesses, property owners, and nongovernmental partners to establish policies that prevent displacement of those with low incomes and renters, and ensure equitable distribution of the costs and benefits of energy efficiency upgrades. Identify additional opportunities for climate resilient, renewable, affordable, and environmentally just forms of renewable energy systems and electrification.
    - Increase green space and tree plantings in identified heat islands and in areas with poor air quality.
- Climate Adaptation Strategy
    - Promote other forms of green infrastructure, especially in places suffering from extreme heat.
    - Prioritize investment in areas that have lower property values. Green infrastructure investments should be coordinated with affordable housing and other policies to avoid impacts of green gentrification and related displacement.
    - Support food security.
    - Consider opportunities to combine adaptation and food security efforts, such as through increasing the urban tree canopy with plantings of fruit and nut trees when/where appropriate. Plantings should be coordinated with fruit and nut tree maintenance education programs (e.g. plantings on public school properties) to relieve burden on Public Works.
- Natural Hazards Plan
    - VC-9— Develop a Plan and Agreement to Increase Elevation of Units within Lakeside Mobile Estates. Work with property owner on a plan and schedule for raising or removing mobile homes that are located in the 100-year floodplain, and identification of possible grant funding that can assist in the costs of such enhancements.

Vancouver's Parks, Recreation, and Cultural Services Comprehensive Plan (2022-2031) also supports future park access by identifying areas of greatest need (City of Vancouver, 2022). It found that many of these areas have not seen significant growth, so the City has not collected substantial park impact fees that would help fund future park development. The plan includes a capital facilities plan with more than 20 acquisition projects and more than 60 park improvement projects across the city, prioritized based on community needs, unique natural and cultural resources, improving interconnectivity, and partnership opportunities.

4. Metrics and Evaluation Framework

Description of the Alternatives

As described in Chapter 1, there are three growth alternatives evaluated as part of the Draft EIS for the Comprehensive Plan periodic update:

No Action Alternative. The No Action Alternative, required by SEPA, is a future scenario that assumes future growth and development would occur in line with the currently adopted City Comprehensive Plan and development regulations, and recent amendments to state statutory requirements that contain self-executing provisions. The No Action Alternative assumes the implementation of House Bill (H.B.) 1110, which generally requires cities of at least 75,000 people to permit "middle housing" of at least four residential units per lot in all areas of the city where single-family housing is allowed. However, the No Action Alternative does not assume the implementation of other amendments to state law that do not contain self-executing provisions, such as H.B. 1220, which requires planning for and accommodating housing affordable to all economic segments of the population, and H.B. 1337, which requires cities like Vancouver to allow up to two accessory dwelling units (ADUs) on a residential lot assuming development regulations are met.

Under the No Action Alternative, the Comprehensive Plan land use designations would remain the same as they are today. The Comprehensive Plan Update and associated zoning code and development regulations would not be adopted. Exhibit 4-1 shows the City's zoning designations under the No Action Alternative.

Action Alternatives. Both Action Alternatives assume that future growth and development would occur in line with the proposed Comprehensive Plan Update and the associated revised zoning code and development regulations. The Action Alternatives assume implementation of all current amendments to state law that affect comprehensive planning and development processes, including H.B. 1110, H.B. 1220, and H.B. 1337.

Under both Action Alternatives, the Comprehensive Plan land use designations and associated zoning code would be renamed and simplified to a smaller set of place types. The locations and sizes of the proposed place types would differ between the two Action Alternatives, as would the distribution of new housing units and jobs. Both Action Alternatives are forecasted to exceed the City's minimum 2045 targets of at least 38,129 new housing units and 43,198 new jobs.

- **Alternative 1** would allow greater intensity and density of development in more areas of the city than the No Action Alternative but in fewer areas of the city than Alternative 2. These changes in land use designations would result in a higher capacity for new housing

units and jobs than the No Action Alternative but a lower capacity than Alternative 2. Based on market feasibility and redevelopment potential, Alternative 1 would have capacity for approximately 45,100 new housing units and 47,500 new jobs citywide, which is higher than the City's minimum 2045 planning targets of at least 38,129 new housing units and 43,198 new jobs. Exhibit 4-2 shows the proposed zoning under Alternative 1.

- **Alternative 2** would allow the greatest intensity and density of development in more areas of the city compared to the other alternatives. With these changes in land use designations, Alternative 2 would have the highest capacity for new housing units and jobs of all the alternatives. Based on market feasibility and redevelopment potential, Alternative 2 would have capacity for approximately 50,700 new housing units and 51,800 new jobs citywide, which exceeds the minimum City's 2045 planning targets of at least 38,129 new housing units and 43,198 new jobs. Exhibit 4-3 shows the proposed zoning under Alternative 2.

Of all the alternatives, Alternative 2 would allow the greatest density, intensity, and mix of land uses in the most areas of the city, and the No Action Alternative would allow the least. Alternative 1 would allow greater density, intensity and mix of land uses in more areas of the city than the No Action Alternative but generally less than Alternative 2.

The biggest differences in place types as measured by land area would be:

- Almost 50 percent more land area designated as Low-Scale Neighborhood under Alternative 1 compared to Alternative 2.
- Almost 50 percent more land area designated as Medium-Scale Neighborhood under Alternative 2 compared to Alternative 1.
- About double the land area designated as Regional Activity Center under Alternative 2 compared to Alternative 1.

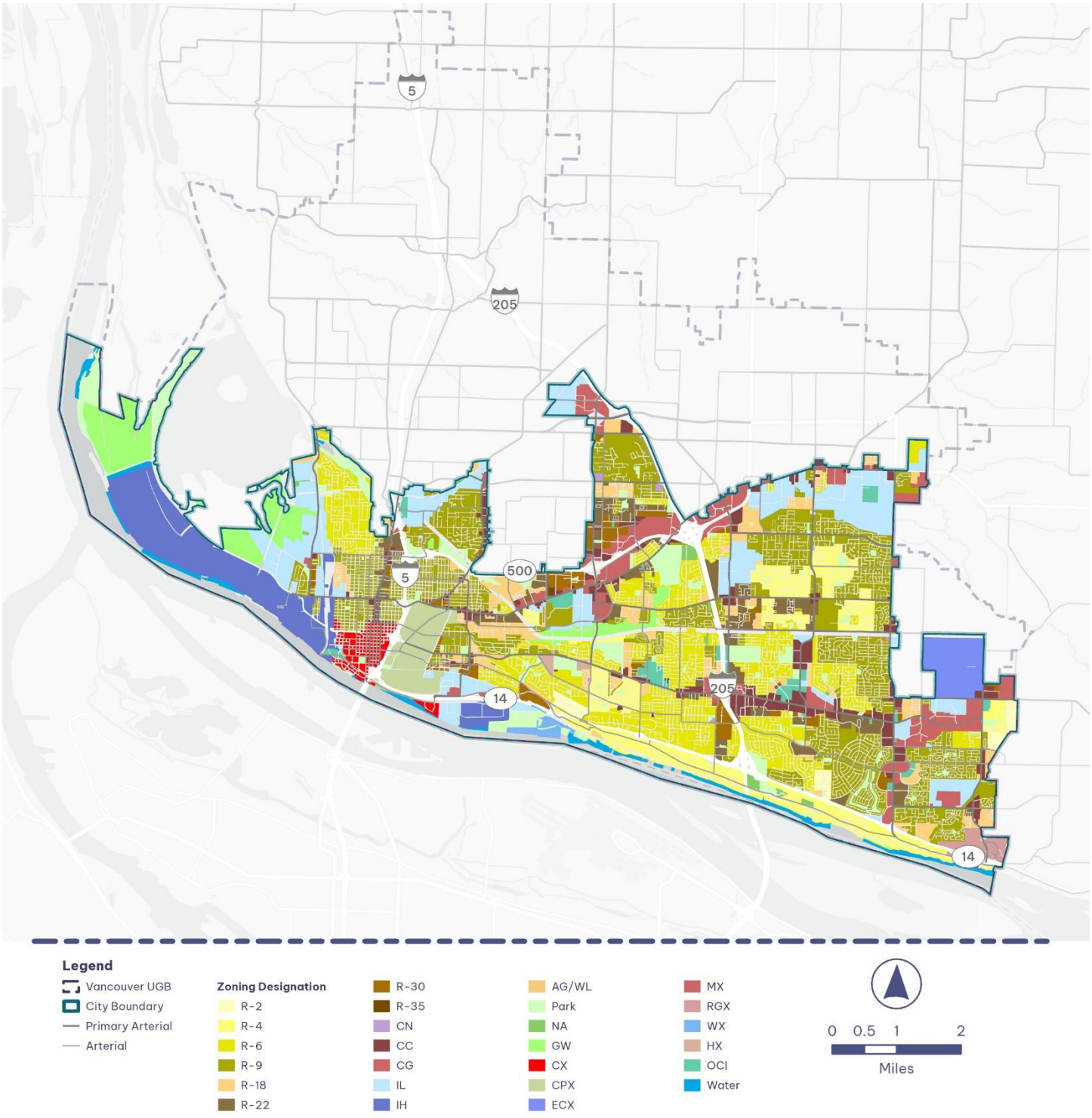
Place type descriptions for the Action Alternatives are as follows:

- **Low-Scale Neighborhood:** Focuses on low-scale housing choices, typically with up to 6 units per parcel and building heights of up to 3 stories (maximum of 45 feet). Any lot would be allowed to have at least four units. Housing types include single-family homes, accessory dwelling buildings, and multifamily residential buildings sometimes referred to as "middle housing," including duplexes (two-unit structures), townhouses (attached single-family homes), quadplexes (four-unit structures), and sixplexes. Small-scale commercial activities like cafes, salons, professional services, and restaurants mostly serving the surrounding neighborhood would also be allowed.

- **Medium-Scale Neighborhood:** Focuses on medium-scale housing choices, typically with up to 12 units per parcel and building heights of 2 to 5 stories (maximum of 60 feet). Housing types include all of the types allowed in the Low-Scale Neighborhood plus additional multifamily building types, including courtyard buildings and multifamily mixed-use buildings. Civic/institutional buildings and commercial activities like cafes, restaurants, small offices, and other retail goods would also be allowed.
- **Mixed-Use Neighborhood:** Provides for a broad range of housing, commercial, and civic/institutional use types, with building heights of 3 to 8 stories (maximum of 90 feet). Housing types include multifamily buildings at a variety of scales. Commercial or retail uses may include professional offices, medical providers, cafes, restaurants, small grocery stores, markets, and other retail goods.
- **Regional Activity Center:** Includes lands that offer opportunities for economic, entertainment, civic, and housing needs, with minimum building heights of 3 stories and no maximum building heights. Size and makeup of this place type would vary based on location but would typically consist of compact, mixed-use development that maximizes residential, commercial, and open space opportunities. Typical housing options would be mixed-use residential, apartment, mid-rise, and podium buildings.
- **Institutional/Campus:** Includes lands that support academic, civic, or medical buildings up to 12 stories (maximum of 150 feet). Allowable housing types include townhouses, multifamily, and mid-rise buildings. Buildings for athletic facilities, event spaces, equipment or other accessory uses needed to support an educational, medical, or large institution would also be allowed.
- **Industrial/Employment:** Includes lands typically housing large-scale, single-tenant industrial, warehouse and flex space building and smaller, multi-tenant industrial buildings ranging from 2 to 12 stories (maximum of 150 feet). The buildings would be grouped to support and serve one another and to provide opportunities for employment clusters. Housing would not be allowed in this place type.
- **Heavy Industrial:** Includes lands that are currently zoned for heavy industrial uses, such as manufacturing and production, within the city and would remain unchanged. Housing would not be allowed in this place type.
- **Parks/Open Space:** Includes lands dedicated to public parks, open spaces, natural areas, trails, and greenways, intended to provide a full range of passive and active uses as well as environmental protection and enhancement.

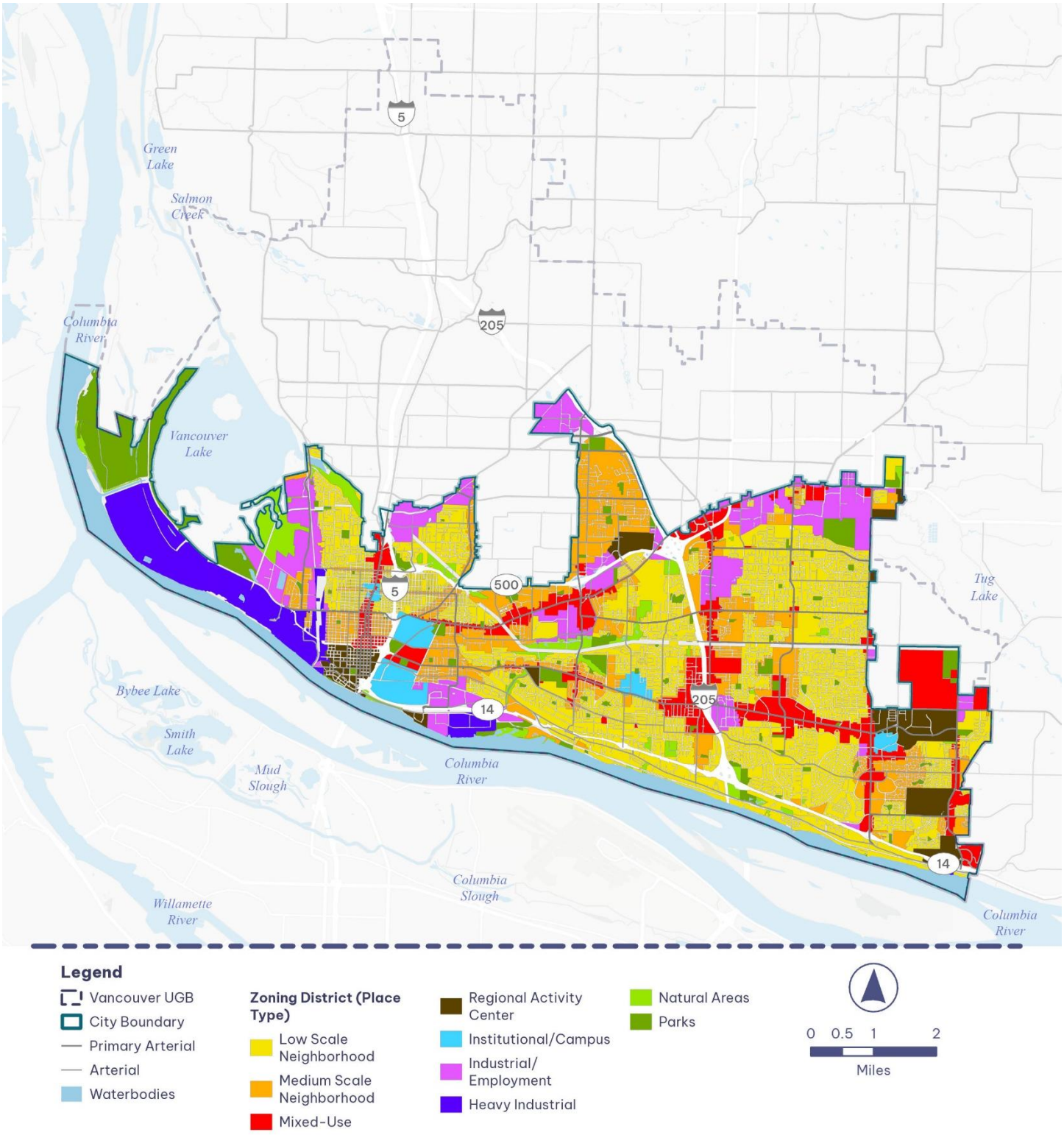
Refer to the City's Draft EIS for more details on the growth alternatives.

Exhibit 4-1: No Action Alternative Zoning Map



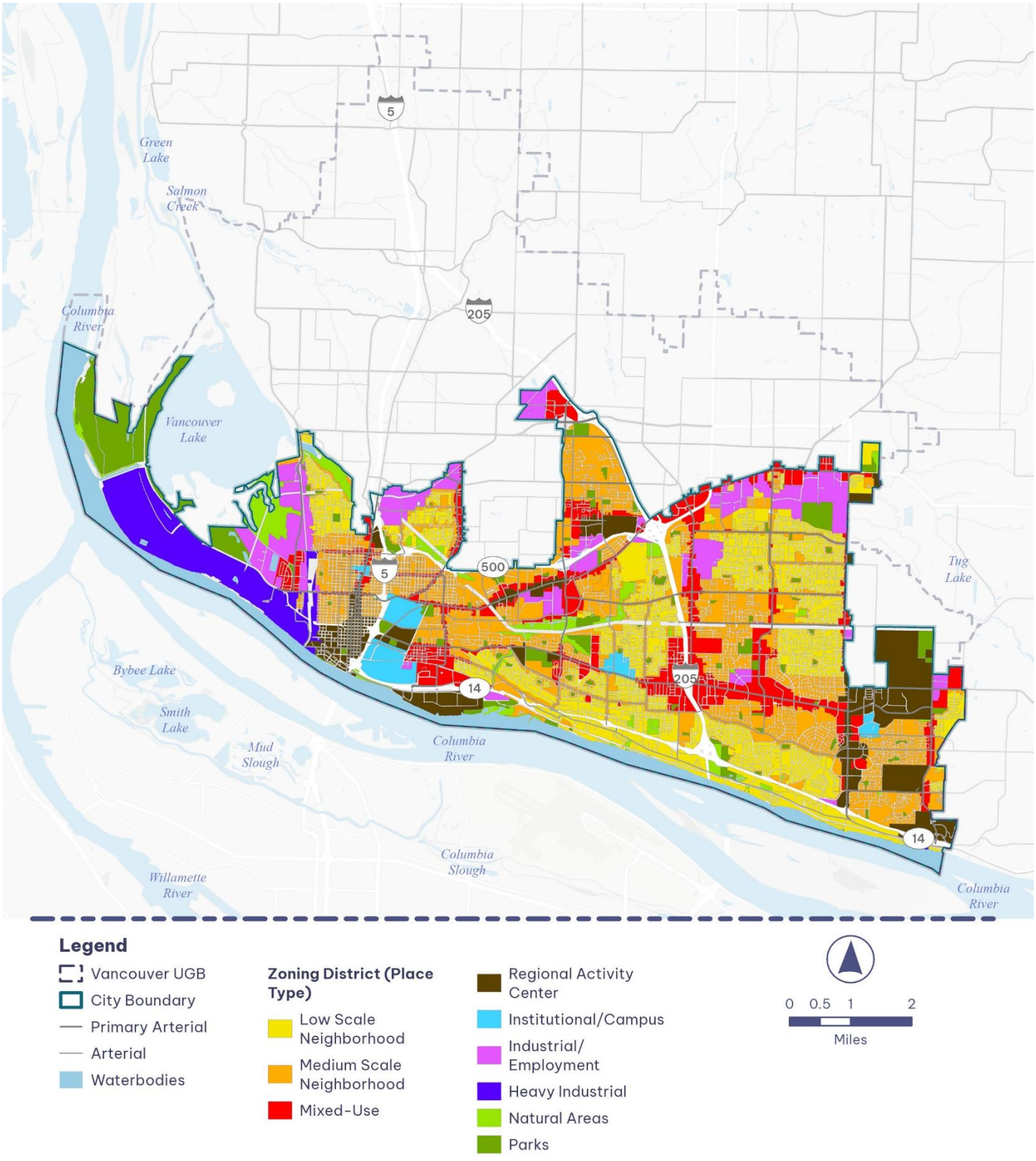
Source: City of Vancouver, 2025.

Exhibit 4-2: Alternative 1 Proposed Zoning Districts Map



Source: City of Vancouver, 2025.

Exhibit 4-3: Alternative 2 Proposed Zoning Districts Map



Source: City of Vancouver, 2025.

Metrics

There are 19 total metrics for this health analysis (Exhibit 4-4). The metrics relate to the scoped topics of physical activity, food access, community connections, exposure to health hazards, and housing and financial security.

There are two types of metrics included:

- **Impacts:** These metrics consider where growth is placed in relation to health hazards and gaps in health-related services. Related strategies may mitigate the impacts or address the gaps.
- **Strengths:** These metrics consider the health benefits built into each alternative. Related strategies may build upon the alternatives' strengths.

Exhibit 4-4: Health Metrics

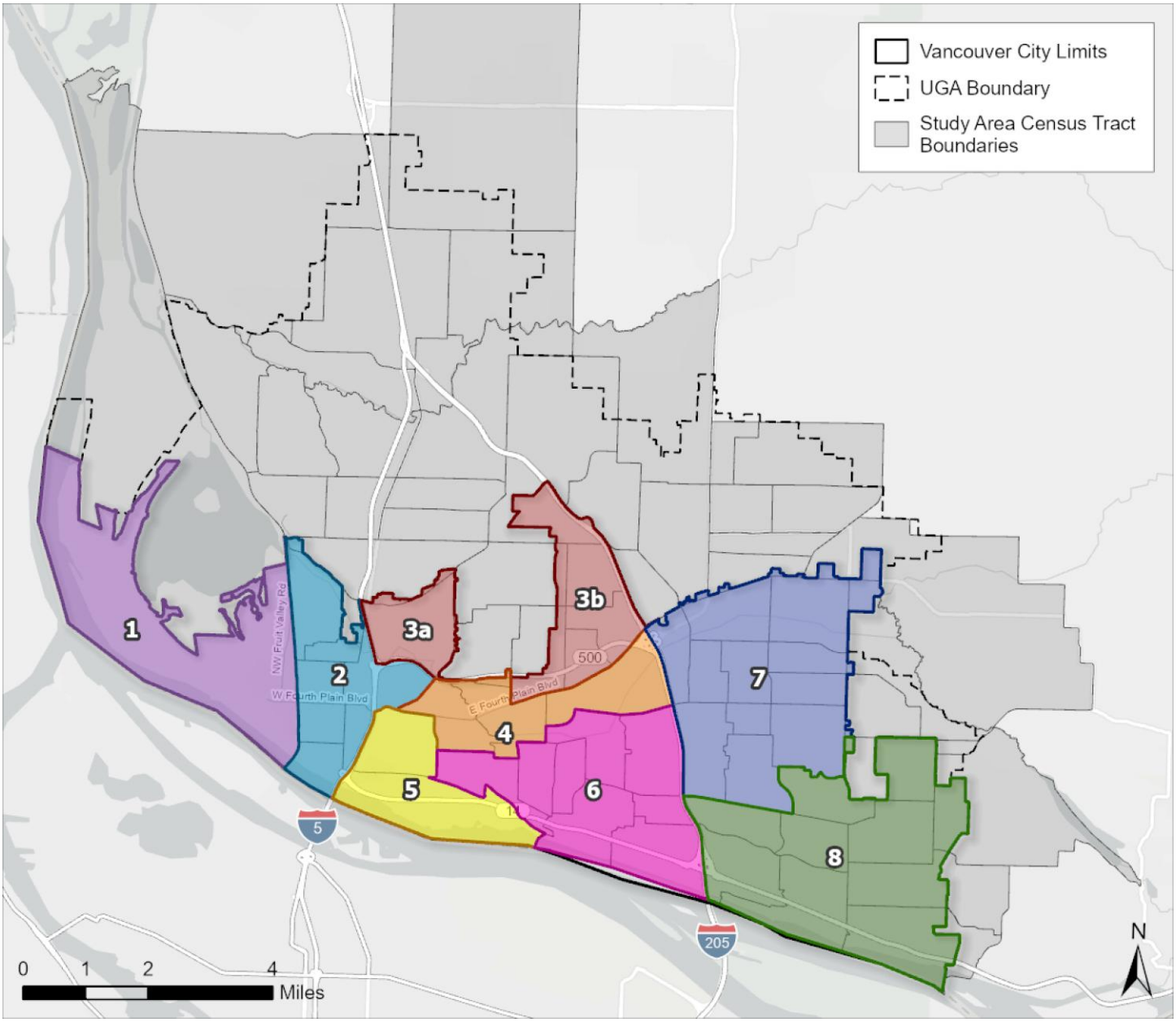
Theme	Topic	Metric	Type
Physical Activity	*Parks Access*	Park acreage needed based on housing growth	Impacts
	Active Transportation	New housing outside of areas with high intersection density	Impacts
Food Access	*Access to Supermarkets*	Housing growth in areas with low access and potential for new stores	Impacts
Community Connections	*Connected and Accessible Neighborhoods*	Job growth in areas with high equity risk scores and low connectivity/accessibility	Strengths
	Commercial Displacement	"Underutilized" parcels and parcels with older buildings that are designated for mixed use or higher densities	Impacts
	Density and Mixed Uses	Increases to density and mixed uses	Strengths
Exposure to Health Hazards	*High $PM_{2.5}$ Concentration*	Housing growth in areas with high concentrations	Impacts
	High Ozone Concentration	Housing growth in areas with high concentrations	Impacts
	Tree Canopy Coverage	Housing growth in areas with low canopy coverage	Impacts
	Transportation Noise	Housing growth in areas with high noise	Impacts
	Heat Islands	Housing and job growth in heat islands	Impacts

Theme	Topic	Metric	Type
	Proximity to Transit	Housing and job growth in areas not accessible by transit, and potential for new transit	Impacts
	*Vehicle Miles Traveled (Water Quality)**	Overall projected vehicle miles traveled per capita	Impacts
	Climate Exposure	Housing and job growth in areas exposed to climate hazards	Impacts
Housing and Financial Security	*Redevelopment of Older Housing*	New housing in areas with older buildings	Strengths
	Apartments of Three or More Stories (Radon Risk)	Housing growth in designations that allow apartments of three of more stories	Strengths
	Housing Capacity for All Income Bands	Housing capacity by income bands	Strengths
	Displacement Risk	Housing growth in areas of high displacement risk	Impacts
	Higher-Wage Jobs	Amount of and projected average wages of new jobs, based on land use designations	Strengths

** Reducing vehicle miles traveled is associated with improved water quality, see Literature Review below.*

The impact assessment in the next chapter considers which eight areas of the city, as shown in Exhibit 4-5, are most affected in the context of each metric.

Exhibit 4-5: Analysis Areas



Source: City of Vancouver, 2025; BERK, 2025.

5. Impact Assessment and Strategies

This chapter evaluates the potential health impacts associated with each land use alternative. A brief literature review is included to inform the impact assessment. Key strategies for each topic are also discussed as part of the alternatives evaluation.

Literature Review

Physical Activity

Physical activity is a critical social determinant of health, according to the Washington State Department of Health (Washington State Department of Health, 2013). Parks have a positive association with physical activity and are therefore one way the built environment can encourage health (Washington State Recreation and Conservation Office, 2019; National Park Service, 2017). Walkable proximity to parks, specifically, has been found to have connections with physical activity (Washington State Recreation and Conservation Office, 2019; Trust for Public Land, 2023).

Active transportation interventions (such as street connectivity, sidewalks, trails, and bicycle infrastructure) and land use interventions (such as mixed uses, increased density, and proximity to destinations) are also associated with greater physical activity. One review of academic studies conducted by the U.S. Department of Health and Human Services found evidence to support this: physical activity increased among individuals in communities with new or improved projects or policies that combine transportation and land use components (Community Preventative Services Task Force, 2018). One 2022 study suggested that 100 intersections per square kilometer (or about 0.4 intersections per acre) is associated with greater likelihood of walking for transportation (Cerin, et al., 2022).

Food Access

Several studies have found a link between “food deserts” (neighborhoods with minimal food options) or “food swamps” (neighborhoods with fast food and snack food available but not fresh grocery staples) and poor health outcomes. One study from 2023 found that food swamps are associated with much higher likelihood of greater obesity-related cancer mortality (Bevel, et al., 2023). Another article reviewed the literature on food deserts, much of which emphasizes the link between access to supermarkets and health outcomes (Walker, Keane, & Burke, 2010).

Community Connections

Research has found connections between neighborhood design and health, including availability of amenities and social interaction (Elegbede, J. et al., 2020; Dannenberg, A. et al., 2003). Specific types of public spaces, such as parks and community centers, may be

particularly helpful for fostering social connections and reducing isolation (Kweon et. al, 1998).

Exposure to Health Hazards

Research has found connections between a variety of health hazard topics and land use planning. Trees and shrubs are known to be effective for removing air pollution and improving urban air quality, as well as reducing urban heat (Nowak, Crane, & Stevens, 2006; Trust for Public Land, 2016). Reducing vehicle miles traveled is connected to less stormwater runoff and improved water quality (Currey et al., 2015). Effective strategies identified for climate resiliency include designing buildings and infrastructure that are adaptable, using community-driven planning, and improving natural infrastructure such as green spaces, urban forests, and stormwater management (Kong, L. et al, 2022).

Housing and Financial Security

Research has found that housing affordability, quality, and stability are key to health and wellbeing. Affordable housing initiatives, housing quality improvements, and anti-displacement efforts can support health outcomes (Rolfe, S. et al., 2020). Planning for more living wage jobs also impacts health. Ensuring that households earn enough income to meet basic needs can reduce financial pressure, improve access to healthcare, and enhance overall wellbeing (Turcu, C. et al., 2012). Findings also suggest that residential displacement can have negative health outcomes, particularly related to mental health (Delong, 2023).

Alternatives Evaluation and Strategies

Key Findings

The following section summarizes key findings for consideration in the policy recommendations, with metrics falling under one of two types: 1) impacts or 2) strengths.

Exhibit 5-1: Metrics Summary

Impacts	No Action										Alternative 1										Alternative 2									
	Impact	Areas of impact									Impact	Areas of impact									Impact	Areas of impact								
		1	2	3a	3b	4	5	6	7	8		1	2	3a	3b	4	5	6	7	8		1	2	3a	3b	4	5	6	7	8
Parks Access	◐		•	•	•	•	•	•	•	•	● +		•					•	•	•	● +		•	•				•	•	•
Active Transportation	●		•	•	•	•	•	•	•	•	● +		•	•	•	•		•	•	•	● +		•	•	•	•		•	•	•
Access to Supermarkets	◐		•	•				•	•	•	● +		•					•	•	•	● +		•	•	•			•	•	•
Commercial Displacement	◐	•	•	•	•	•	•	•	•	•	● +		•	•	•	•	•	•	•	•	● +		•	•	•	•	•	•	•	•
High $PM_{2.5}$ Concentration	●			•	•	•	•	•			◐ +						•	•			◐ +						•	•		
High Ozone Concentration	◐									•	● +									•	● +									•
Proximity to Transit	●	•		•				•	•	•	● +	•		•				•	•	•	● +	•		•				•	•	•
Tree Canopy Coverage	●	•	•		•		•	•	•	•	● +		•						•	•	● +		•				•		•	•
Vehicle Miles Traveled (Water Quality)	●	•	•	•	•	•	•	•	•	•	● +	•	•	•	•	•	•	•	•	•	● +	•	•	•	•	•	•	•	•	•
Transportation Noise	◐		•			•	•	•	•	•	◐ +		•		•		•	•		•	◐ +		•				•	•	•	•
Heat Islands	◐				•	•	•	•	•		● +		•				•		•	•	● +		•				•		•	•
Climate Exposure	●	•	•			•	•	•	•	•	● +		•				•	•		•	● +		•				•	•		•
Displacement Risk	●		•	•	•	•	•	•	•	•	● +		•					•	•	•	● +		•					•	•	•

Strengths	No Action	Alternative 1	Alternative 2
Connected and Accessible Neighborhoods	☆	★	★
Density and Mixed Uses		★	★
Redevelopment of Older Housing	☆	★	☆
Apartments of 3+ Stories (Radon Risk)	☆	★	★
Housing Capacity for All Income Bands		★	★
Higher-Wage Jobs	☆	★	★

Source: BERK, 2025.

Impacts
◐ Some Impact
● Strong Impact
\+ Opportunity for mitigation or to fill a gap

Strengths
☆ Somewhat strong
★ Very strong

Physical Activity

Metrics

- Park acreage needed based on housing growth *(Impacts)*
- New housing outside of areas with high intersection density *(Impacts)*

Overview

- All alternatives will need more investment in parks, especially the Action Alternatives
- Alternatives 1 and 2 also create greater opportunities to address existing gaps through park impact fees and new policies
- All alternatives place the majority of growth in areas with a lower density of intersections, which may impact walkability
- Alternatives 1 and 2 also create more opportunities for walkability through density, mixed uses, and opportunities for sidewalk development and connectivity

Evaluation

All alternatives will increase demand for parks and recreation as the city grows. Exhibit 5-2 shows the estimated amount of new park acreage that would need to be acquired and developed under each alternative to meet this standard based on the estimated 2045 capacity for new housing units and associated new residents.

Under all alternatives, Park Impact Fee District C would have the largest need for park land acquisition and development because it is projected to have the highest capacity for new growth. The No Action Alternative would have the lowest overall parks need because it would have the lowest projected level of population growth based on capacity for new housing units. Alternative 1 and Alternative 2 would have higher needs than the No Action Alternative because of their higher levels of projected new housing units and associated residents. While growth would create demand for more parks, it would also increase the amount of funding available from impact fees, which make it possible to fill gaps that otherwise would be challenging to address.

In the No Action Alternative, areas of housing capacity with low park access include parts of areas 2, 3a, 3b, 4, 5, 6, 7, and 8. In Alternatives 1 and 2, concentrations of housing growth in low access areas include parts of areas 2, 6, 7, and 8 (plus area 3a in Alternative 2).

Exhibit 5-2: Projected Park Land Demand by Park Impact Fee District and Alternative (acres)

Park Impact Fee District	New Park Acquisition Demand[1] for No Action Alternative[2]	New Park Development Demand[1] for No Action Alternative[2]	New Park Acquisition Demand[1] for Alternative 1	New Park Development Demand[1] for Alternative 1	New Park Acquisition Demand[1] for Alternative 2	New Park Development Demand[1] for Alternative 2
A	76	54	75	53	65	46
B	134	95	70	50	126	89
C	199	141	477	338	509	361
Total	**408**	**289**	**622**	**441**	**700**	**496**

Notes:

1 The acreage of park acquisition demand under the alternatives was estimated as follows: 1) multiplying the total projected number of new housing units in each Park Impact Fee district by 2.3, which is the assumed average number of persons per household from the Our Vancouver Housing Needs Assessment ((EcoNorthwest, 2024)), to derive the estimated new population in each PIF district. 2) Dividing the estimated new population by 1,000 and multiplying the resulting number by 6, based on the City's goal of 6 acres per 1,000 residents, to calculate the estimated acreage demand for this new population. Totals may be affected by rounding.

2 The No Action Alternative is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.

Source: WSP, 2025.

All alternatives include most of their capacity or growth in areas that do not have high intersection density (more than 0.4 intersections per acre) (Exhibit 5-3). Higher intersection density is associated with greater likelihood of walking for transportation. Therefore, other urban design considerations will be needed to support walkability in growth areas. Alternatives 1 and 2 create more density and opportunities for mixed uses than the No Action Alternative. Alternatives 1 and 2 also plan for more development, which creates more opportunities for improved sidewalks and pedestrian connectivity. Affected areas are similar across all the alternatives, including parts of area 2, 3a, 3b, 4, 6, 7, and 8. Part of area 5 is also affected in the No Action Alternative.

Exhibit 5-3: Growth in Areas Without High Intersection Density

	No Action	Alternative 1	Alternative 2
Units	24,000*	41,000	48,510
Percent of Units	81%*	91%	96%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

Strategies

Features of the Alternatives

- The Comprehensive Plan periodic update includes an opportunity to consider future transportation improvements based on growth. The Action Alternatives therefore may be better positioned to make targeted investments in non-motorized access, prioritizing equity.
- Growth under the Action Alternatives especially could leverage park impact fees to fill gaps in park access.

Other Considerations

City-Led Opportunities

- Identify strategic property acquisitions before expected growth occurs that could later be developed into parks through park impact fees *(related to Policy 23: Broaden Equitable Access to Natural Spaces and Parks, Policy 68: Improve Connectivity Between Parks and Open Spaces, and Policy 7: Acquire Land for Public Parks)*.
- Adopt street standards that support active transportation *(related to Policy 140: Street Standards)*.
- Consider a pilot program to close certain residential streets to through traffic, as discussed in Appendix 3. Case Studies *(related to Policy 34: Community Streets)*.
- Continue working towards transportation safety improvements for pedestrians and cyclists, with targeted investments in known collision areas and overall improvements in active transportation, to eventually support better "safety in numbers" *(related to Policy 144: Support Active Transportation Investments, Policy 139: Street Connectivity, Policy 87: Low-Stress Bicycle and Small Mobility Network, and Policy 33: Community Safe Routes)*.
- Review the City's land use code for opportunities to encourage pedestrian scale design, such as transparent frontages, surface parking, and driveways at the rear of buildings, weather protection, street trees, and public art *(related to Policy 99: Pedestrian Oriented Design)*.

Partnership Opportunities

- Partner with schools and other public facilities to add recreation facilities and benefit from multiple funding and implementation streams (see Appendix 3. Case Studies) *(related to Policy 23: Broaden Equitable Access to Natural Space and Parks and Policy 152: Sustainable Parks Funding)*.
- Engage neighborhoods in tactical, community-led short-term and long-term phased park and street improvements, especially in underserved areas (see Appendix 3. Case Studies) *(related to Policy 34: Community Streets and Policy 144: Support Active Transportation Investments)*.

Food Access

Metrics

- New housing in areas with low access to supermarkets and potential for new stores *(Impacts)*

Overview

- All alternatives place some capacity or growth in areas without existing access to supermarkets
- Alternatives 1 and 2 place a greater proportion of growth in these gap areas
- Alternatives 1 and 2 also create greater opportunities to address existing gaps by creating the density supermarkets need to be feasible

Evaluation

All alternatives place the majority of growth in areas without an existing supermarket within a mile walkshed. However, Alternatives 1 and 2 are also more likely to create opportunities for new supermarkets by allowing more mixed-use development and higher housing densities that could support new retail locations.

Generally, a parcel needs 6,000 to 8,000 households within a 1-2 mile radius to feasibly support a new supermarket (Gibbs, 2012). Assuming 6,000 households per 1.5 mile radius as a threshold, this is about 1.3 households per acre.

In the areas of Vancouver that are currently more than a mile from a supermarket, the average density is 0.7 units per acre in the No Action Alternative, 1.5 units per acre in Alternative 1, and 1.6 units per acre in Alternative 2. Alternatives 1 and 2 are therefore over the density threshold and could support new supermarkets in gap areas whereas the No Action Alternative may not create enough density to do so. Approximately 5 new supermarkets could be supported in gap areas under Alternatives 1 and 2 given the total number of households and average density of those households.

Alternatives 1 and 2 would also be better positioned to support small corner stores due to this density and support for mixed uses. Around 1,000 households are needed to support these uses (MRSC, 2024).

Exhibit 5-4: New Housing Units without Supermarket Access

	No Action	Alternative 1	Alternative 2
Units	13,900*	31,000	33,800
Percent of Units	47%*	69%	67%
Potential new supermarkets supported @ 6,000 households in 1.5 mile radius	0	5	5

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

In the No Action Alternative, areas of housing capacity outside of supermarket access include 2, 3a, 6, 7, and 8. Alternatives 1 and 2 have concentrations of housing growth outside of supermarket access in parts of areas 2, 6, 7, and 8 (and 3a and 3b in Alternative 2).

Strategies

Features of the Alternatives

- Density increases and more mixed use under Alternatives 1 and 2 are likely to create more opportunities for new supermarkets, expanding access to food for current and future residents.

Other Considerations

City-Led Opportunities

- Provide policy and programmatic support for community gardening, food banks, farmers markets, and other food access initiatives across Vancouver. This could include zoning allowances and incentives that promote urban agriculture (see Appendix 3. Case Studies) *(related to Policy 32: Community Gardens)*.
- Continue implementing the Vancouver Local Food Systems Action Plan *(related to Policy 78: Increase Food Access)*.
- Facilitate the success of supermarkets in areas with low access. Incentivize and/or remove barriers to the development of commercial space suitable for supermarkets. This could include tax incentives, density exemptions, or other tools (see Appendix 3. Case Studies) *(related to Policy 78: Increase Food Access)*.
- Review city code for opportunities to expand access to fishing, gathering, and raising livestock and supporting the availability of culturally-specific foods *(related to Policy 32:*

Community Gardens, Policy 49: Engage with Tribal Community Members, and Policy 66: Historic and Culturally Significant Resources).

- Integrate food into public spaces and landscaping, such as planting edible plants and adding grills and food preparation areas in parks *(related to Policy 23: Broaden Equitable Access to Natural Spaces and Parks)*.
- Consider allowing mobile farmers markets and food trucks in locations with low access (see Appendix 3. Case Studies) *(related to Policy 78: Increase Food Access)*.

Partnership Opportunities

- Explore partnerships with community organizations, faith organizations, and existing commercial uses to distribute healthy food in areas of need (see Appendix 3. Case Studies) *(related to Policy 78: Increase Food Access)*.
- Maintain partnership with the Vancouver Farmers Market to improve food access and other economic and social benefits to the community *(related to Policy 78: Increase Food Access)*.

Community Connections

Metrics

- Job growth in areas with high equity risk scores and low connectivity/accessibility *(Strengths)*
- "Underutilized" parcels and parcels with older buildings that are designated for mixed use or higher densities *(Impacts)*
- Increases to density and mixed uses *(Strengths)*

Overview

- All alternatives place some capacity or growth in areas with low access to services. All alternatives create some risk of commercial displacement.
- Alternatives 1 and 2 place a greater proportion of growth in areas with low access to services, creating more opportunity for future services. They also have greater commercial displacement potential.
- Alternatives 1 and 2 also create greater opportunities to mitigate commercial displacement by creating opportunities for mixed uses.

Evaluation

While the three alternatives distribute capacity and growth in different ways, they all place a substantial amount of job growth in areas with high equity risk scores that are not particularly connected and accessible. More than 21% of the capacity or growth in each possibility is in areas with "High" or "Very High" equity risk scores and low connectivity and accessibility scores. Alternatives 1 and 2 place more than twice as many jobs in these areas than the No Action Alternative.

Job growth in these areas suggests an increase in commercial space and therefore more services. Proximity to services can benefit resident wellbeing in terms of access to healthcare, food, and daily needs, as well as opportunities to interact with others. This may be particularly impactful in areas with high equity risk scores, which have greater social and economic inequities.

Exhibit 5-5: New Jobs in Areas with High Equity Risk Scores and Low Connectivity/Accessibility

	No Action	Alternative 1	Alternative 2
Jobs	4,000*	10,200	10,800
Percent of Jobs	24%*	22%	21%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

The three alternatives also include a different mix of land uses. Increases to mixed use designations and increased density can support access to services by providing space for businesses and encouraging the concentrations of residents needed for businesses to be viable. Alternatives 1 and 2 have significantly more potential for mixed-use neighborhoods and higher densities than the No Action Alternative (

Exhibit 5-6). The No Action Alternative has minimal opportunities for mixed uses and higher density housing and therefore is likely to have less access to services.

Exhibit 5-6: Mixed Uses and Density

	No Action	Alternative 1	Alternative 2
Mixed Use and Regional Activity Center Gross Acreage %	0%* (Mixed Use zoning is minimally applied)	11%	16%
New Housing Units in Mixed Use/ Regional Activity Center or Medium Scale and Higher %	15%*	67%	77%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

Commercial displacement is likely to occur to some extent under all alternatives as the city will experience some amount of growth and development. Parcels that are considered "underutilized" based on building value per acre (per the Clark County 2023 Vacant and Buildable Lands Model) are considered more likely to redevelop than those that are fully

"built" (Clark County, 2023). Older buildings may also be more likely to redevelop based on their condition. Parcels with mixed use, medium density, or high density land use designations may be more likely to redevelop into higher density uses, with potential commercial displacement impacts.

Alternatives 1 and 2 include more of these zoning districts and therefore may have higher potential for commercial displacement and need for mitigation (Exhibit 5-7). This includes more than 1,000 commercial buildings on parcels considered "underutilized" that are in medium/high density residential or mixed use/regional activity center designations. However, Alternatives 1 and 2 would also create more opportunity for new business spaces and anti-displacement measures. The No Action Alternative would rely on existing policies and would be less strong in terms of anti-displacement.

Exhibit 5-7: Commercial Displacement Potential

	No Action	Alternative 1	Alternative 2
Commercial Buildings on "Underutilized" Parcels, Land Use Designation Medium/High Density Residential or Mixed Use / Regional Activity Center	35	196	242
Commercial Buildings Built Pre-1985, Land Use Designation Medium/High Density Residential or Mixed Use / Regional Activity Center	33	277	333

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025

Strategies

Features of the Alternatives

- Density increases and more mixed use under Alternatives 1 and 2 are likely to create more opportunities for access to services and mitigate commercial displacement.

Other Considerations

City-Led Opportunities

- Support the ability of small businesses to locate in neighborhoods by requiring or incentivizing the development of small commercial spaces and lowering parking requirements (see Appendix 3. Case Studies) *(related to Policy 10: Affordable Commercial*

Space, Policy 133: Shared Parking, and Policy 88: Maximize the Utilization of Existing On-Street Parking).

- Consider anti-displacement policies such as incentives for setting aside small business space in new developments, providing affordable commercial leasing opportunities on City-controlled properties, or requiring community benefits agreements that protect existing businesses *(related to Policy 112: Reduce Displacement in the Face of New Growth)*.
- Consider programmatic opportunities to address the social needs of the community, through group recreation, community events, or other programs *(related to Policy 75: Increase Access to Community Spaces and Policy 30: Community Centers)*.
- Review land use code for potential barriers to the creation of new childcare facilities *(related to Policy 143: Support Access to Childcare and Policy 125: Resources for Youth and Aging Populations)*.

Partnership Opportunities

- Provide flexibility in neighborhood commercial spaces, such as a short-term program to fill vacant spaces or add pop-ups (see Appendix 3. Case Studies) *(related to Policy 10: Affordable Commercial Space)*.
- Build on the findings of the Raising Clark County project to improve childcare access in Vancouver and support public-private partnerships *(related to Policy 143: Support Access to Childcare and Policy 125: Resources for Youth and Aging Populations)*.

Exposure to Health Hazards

Metrics

- New housing units in areas with high $PM_{2.5}$ concentration *(Impacts)*
- New housing units in areas with high ozone concentration *(Impacts)*
- New housing units in areas with low tree canopy coverage *(Impacts)*
- New housing units in areas with high transportation noise *(Impacts)*
- New housing units and jobs in heat islands *(Impacts)*
- New housing units and jobs not accessible to transit and potential for new transit *(Impacts)*
- Overall projected VMT (water quality) *(Impacts)*
- Growth in areas with climate exposures *(Impacts)*

Overview

- All alternatives expose some amount of new housing to air quality hazards, noise, heat, and climate hazards, and have water quality impacts.
- The Action Alternatives include better mitigation of impacts through policy changes that are part of the periodic update.
- The Action Alternatives also include opportunities to address gaps, such as by requiring new developments to add trees or otherwise address heat islands.

Evaluation

Based on the distribution of growth and capacity across the city, all alternatives expose some amount of new housing units to air quality hazards. This includes high $PM_{2.5}$ concentration and ozone concentration, as defined as scoring 9 or 10 for these exposures on the Washington State Environmental Health Disparities Map (Washington State Department of Health, 2022). Per this source, $PM_{2.5}$ is highest in the middle of the city while ozone is highest towards the east.

All the alternatives include at least 18% of their housing capacity or growth in areas with high $PM_{2.5}$ concentration and at least 16% in areas with high ozone concentration. Residents of this housing would be more exposed to air quality health impacts than in some other parts of the city.

In the No Action Alternative, areas with high capacity in air quality hazard areas include 3a, 3b, 4, 5, and 6 for $PM_{2.5}$ and area 7 for ozone. In the Action Alternatives, areas 5 and 6 have the highest growth and exposure to $PM_{2.5}$ and area 8 is of more concern for ozone.

The Action Alternatives, however, would encourage a walkable, compact, and mixed-use style of development in more areas of the city than the No Action Alternative, and over time,

would be more likely to shift vehicle trips to zero-emission modes, facilitate shorter trips, and reduce air pollutant emissions.

Exhibit 5-8: New Housing Units in Areas with Air Quality Impacts

	No Action	Alternative 1	Alternative 2
High $PM_{2.5}$ concentration			
Units	10,100*	8,000	9,700
Percent of Units	34%*	18%	19%
High Ozone Concentration			
Units	4,800*	15,100	16,700
Percent of Units	16%*	33%	33%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All alternatives also place at least 57% of their housing capacity or growth in areas with low tree canopy cover (defined as those Census tracts with less than the current citywide average of 19%, using City data) (City of Vancouver, 2025; City of Vancouver, 2020). Residents of these areas could see fewer air quality benefits from trees (Exhibit 5-9Exhibit 5-9).

In the No Action Alternative, areas with capacity and low canopy cover include areas 1, 2, 3b, 5, 6, 7, and 8. In the Action Alternatives, affected areas with growth include 2, 7, and 8 (plus 5 for Alternative 2).

Exhibit 5-9: New Housing Units in Areas with Low Tree Canopy Cover

	No Action	Alternative 1	Alternative 2
Units	16,800*	27,800	30,900
Percent of Units	57%*	62%	61%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All alternatives place some housing unit growth in areas with existing transportation noise above 55 dBA, per mapping from the USDOT (Exhibit 5-10). Distribution of growth is such that all the alternatives place a similar proportion of new housing unit or unit capacity in areas with high transportation noise: approximately 6%. Concentrations of growth in high transportation noise areas in all alternatives are primarily near key corridors such as I-5, I-205, SR-14, and Mill Plain Boulevard. Since Alternatives 1 and 2 would grow beyond the capacity of the No Action, they would place a greater total number of units in transportation noise areas, but they also have stronger opportunities for mitigation through new policies. Construction noise associated with new development would also be likely under all alternatives.

Exhibit 5-10: New Housing Units in Areas with High Transportation Noise

	No Action	Alternative 1	Alternative 2
Units	1,600*	2,800	3,100
Percent of Units	6%*	6%	6%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All alternatives place some housing and job growth in urban heat islands, defined as those areas with Medium-High or Higher heat exposure scores in the City's Climate Index (BERK Consulting, 2024). At least 41% of housing units and 39% of jobs under all alternatives are in high heat exposure areas (Exhibit 5-11). Areas with high heat exposure could be positively impacted by growth over time, as new development is required to incorporate trees and plantings. The Action Alternatives have stronger opportunities to address heat islands through new policies.

Areas of housing and/or job capacity in heat islands in Alternative 1 include 3b, 4, 5, 6, and 7. In the Action Alternatives, areas 2, 5, 7, and 8 are of most concern based on where growth is expected.

Exhibit 5-11: New Housing Units and Jobs in Heat Islands

	No Action	Alternative 1	Alternative 2
Units	14,400*	22,400	20,800
Percent of Units	49%*	50%	41%
Jobs	11,500*	27,600	30,700
Percent of Total Projected Capacity for New Jobs	39%*	61%	61%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All alternatives also place at least one third of housing capacity or growth and at least 37% of job capacity or growth in areas without transit access within one mile. However, Alternatives 1 and 2, due to higher housing densities, may create opportunities for viable new transit routes, which could reduce transportation air quality and noise impacts over time. As described in

Exhibit 5-6 in Community Connections above, Alternatives 1 and 2 put more than 67% of their new housing units in Mixed Use, Regional Activity Center, or medium scale and higher designations. These designations are much more likely to support new transit routes and stops (PSRC, 2015). The growth pattern of the No Action Alternative would be harder to serve with new transit improvements, with lower densities than the other alternatives and only 15% of new units located in similar designations.

Under the No Action Alternative, areas with housing and job capacity with low transit access include 1, 3a, 6, 7, and 8. In the Action Alternatives, growth areas with low transit access include 3a, 6, 7, and 8.

Exhibit 5-12: New Housing and Jobs without Transit Access

	No Action	Alternative 1	Alternative 2
Units	9,900*	20,100	19,600
Percent of Units	33%*	45%	39%
Jobs	6,200*	21,600	22,900
Percent of Jobs	37%*	46%	44%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All alternatives result in an increase of overall vehicle miles traveled (VMT), per modeling completed as part of the City's Comprehensive Plan Environmental Impact Statement. However, VMT per household is expected to decrease as investments are made in other travel modes. Alternatives 2 and 3 result in a lower VMT per household than the No Action Alternative but a greater total VMT as they plan for greater growth. Therefore, water quality impacts at the citywide scale may be greatest under Alternatives 2 and 3, but these alternatives also mitigate the overall increase by minimizing VMT per household.

Exhibit 5-13: Modeled Existing and Future Daily Vehicle Miles Traveled in Vancouver

Vehicle Type	Existing (2023)	No Action Alternative (2045)	Alternative 1 (2045)	Alternative 2 (2045)
All Vehicles Except Trucks	3,949,553	4,783,852*	5,343,949	5,465,254
Trucks (in Passenger Car Equivalent)	215,391	544,077*	541,923	541,302
Total	**4,315,718**	**5,327,928***	**5,885,872**	**6,006,556**
VMT Per Household (average miles per day)[1]	**45.6**	**44.9***	**42.5**	**41.9**

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

[1] VMT per household assumes 94,587 households in existing conditions (2023). For 2045, VMT per household is based on assumptions of 118,607 households in the No Action Alternative, 138,517 households in Alternative 1, and 143,473 households in Alternative 2, calculated by adding estimated new housing unit capacity to 2023 estimated household data from Clark County.

Source: RTC 2025; WSP, 2025.

All alternatives include growth in areas of high climate exposure (Exhibit 5-14). Under all alternatives, about a quarter of the growth or capacity is in areas that are more susceptible to extreme heat, extreme precipitation and flooding, and/or air quality, smoke, and fire. However, Alternatives 1 and 2 include the development of a new Climate Element of the Comprehensive Plan, which includes policies specifically aimed at improving the city's resilience to climate hazards. Therefore, Alternatives 1 and 2 are stronger in terms of climate resilience than the No Action Alternative.

In Alternative 1, areas with capacity that are in high climate exposure areas include 1, 2, 4, 5, 6, 7, and 8. In the Action Alternatives, key areas of growth in exposure areas include 2, 5, 6, and 8.

Exhibit 5-14: New Housing in High Climate Exposure Areas

	No Action	Alternative 1	Alternative 2
Units	7,600*	11,000	11,800
Percent of Units	26%*	25%	23%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

Strategies

Features of the Alternatives

- Greater development in urban heat areas and low canopy cover areas under Alternatives 1 and 2 creates more opportunities for new trees and vegetation.
- The new Climate Element developed under the Action Alternatives includes a range of policies aimed at improving community resilience to climate hazards.
- Opportunities for expanded transit access can help mitigate air quality and noise impacts of growth. The Action Alternatives include a growth pattern that is more feasible to serve with transit.

Other Considerations

City-Led Opportunities

- Review vegetation requirements for new development and require or incentivize greater investment in trees and plants in areas with high heat and low tree canopy cover. This could also include green roofs and permeable pavement (see Appendix 3. Case Studies) *(related to Policy 115: Reduce Heat Island Effect, Policy 72: Incorporate Climate Resilient Infrastructure into Development, Policy 53: Equitably Expand Tree Canopy, and Policy 111: Reduce Climate Impact Exposure to Vancouver's Neighborhoods)*
- Create a policy related to indoor air quality, including standards for new development and a program for retrofitting existing homes *(related to Policy 79: Indoor Air Quality)*.
- Provide temporary or permanent shade structures in parks or rights of way to supplement the existing shade capacity of newly planted trees (see Appendix 3. Case Studies) *(related to Policy 115: Reduce Heat Island Effect and Policy 111: Reduce Climate Impact Exposure to Vancouver's Neighborhoods)*
- Develop or modify design standards to integrate exterior building features that reduce the impacts of climate change and increase resilience (see Appendix 3. Case Studies) *(related to Policy 115: Reduce Heat Island Effect, Policy 72: Incorporate Climate Resilient*

Infrastructure into Development, and Policy 111: Reduce Climate Impact Exposure to Vancouver's Neighborhoods)

- Consider mitigation strategies around major corridors and areas of poor air quality, such as enhancing tree canopy cover and vegetation through street trees, incentivizing tree planting on private property, and strategically locating parks and open spaces *(related to Policy 53: Equitably Expand Tree Canopy and Policy 113: Reduce Environmental Health Disparities)*
- Reduce and mitigate noise pollution through soundproofing measures, incentives, and other strategies *(related to Policy 89: Mitigate Noise Pollution and Policy 113: Reduce Environmental Health Disparities)*
- Create educational opportunities for residents to learn about proper disposal of household chemicals and water quality best practices (see Appendix 3. Case Studies) *(related to Policy 136: Stormwater Management)*.
- Implement policies that support water quality improvements through stormwater management and filtration *(related to Policy 136: Stormwater Management)*.
- Consider implementing policies in support of electric vehicles, which do not emit the same air quality hazards as conventional vehicles. This could include creating public charging stations, transitioning parts of the City's fleet where appropriate, or creating developer requirements or incentives *(related to Policy 85: Low Carbon Fuels and Policy 86: Low Carbon Transportation Alternatives)*.

Partnership Opportunities

- Work with C-TRAN to plan transit investments where future growth is expected to occur and transit is not yet available. The Action Alternatives plan for growth along major corridors, creating opportunities for transit-oriented development if new bus stops are added *(related to Policy 81: Invest in Underserved Areas and Policy 122: Regional Planning)*
- Create opportunities for community-led action plans to address needs in specific areas with proximity to highways and other pollution sources *(related to Policy 113: Reduce Environmental Health Disparities)*.
- Collaborate with Washington State University (WSU) Vancouver Extension and their Water Research Center to monitor water quality trends *(related to Policy 136: Stormwater Management)*.
- Continue to monitor air quality and consider opportunities for partnerships *(related to Policy 113: Reduce Environmental Health Disparities)*.
- Consider partnering with local libraries and schools to provide emergency cooling and heating shelters *(related to Policy 43: Disaster Recovery and Emergency Response)*.

Housing and Financial Security

Metrics

- New housing in areas with older buildings *(Strengths)*
- New housing in designations that allow apartments of three or more stories *(Strengths)*
- Housing capacity for all income bands *(Strengths)*
- New housing units in areas of high displacement risk *(Impacts)*
- Amount of and projected average wages of new jobs, based on land use designations *(Strengths)*

Overview

- All alternatives will result in some redevelopment of older buildings that may be of poorer quality and development of new buildings of three or more stories that may better protect residents from radon exposure.
- All alternatives are expected to have some displacement impacts, but Alternatives 1 and 2 include anti-displacement policies to help mitigate such impacts while the No Action Alternative does not.
- Alternatives 1 and 2 also include better options for housing affordability at all income bands.
- All alternatives create jobs with similar average wages, but Alternatives 1 and 2 create opportunities for encouraging specific industries.

Evaluation

All alternatives place a similar percentage of capacity or growth on parcels with older buildings (32-38%), however the number of units is higher under Alternatives 1 and 2. This may look like redevelopment of older buildings, which are more likely to have health hazards such as lead or poor insulation. Older buildings, however, also tend to be more affordable, so there is a health tradeoff.

Exhibit 5-15: New Housing Units on Parcels with Older Buildings

	No Action	Alternative 1	Alternative 2
Units	10,100*	17,200	16,400
Percent of Units	34%*	38%	32%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All alternatives place growth in designations that allow three or more stories, but Alternatives 1 and 2 place substantially more growth in those areas. Units at or above the third story have less risk of radon exposure.

Exhibit 5-16: New Housing Units in Designations that Allow Three or More Stories

	No Action	Alternative 1	Alternative 2
Units	10,600	30,200	39,000
Percent of Units	32%	67%	77%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

All of the alternatives would provide new housing units throughout the city; however, there would be varying capacity for housing that serves all income bands. In general, it is assumed that alternatives with a higher capacity for new housing units would allow for the greatest opportunity to construct different housing typologies, which in turn have the potential to be more affordable for a broader range of income levels. The No Action Alternative would have the least potential for addressing identified needs. Under this alternative, more than 40% of the new housing would need to be constructed for incomes of less than 80% AMI to meet needs. The No Action Alternative also does not include additional policy or zoning provisions to address the need for more diversity in housing supply. Alternatives 1 and 2 include greater capacity for new housing units with a broader range of typologies, as well as code updates that make requirements easier and simpler to understand. Alternatives 1 and 2 therefore have the most potential to address housing affordability needs.

All alternatives are likely to have some impact on residential displacement due to growth and redevelopment. Under all alternatives, at least 14% of housing unit capacity or growth is located in areas defined as high risk in the Washington State Displacement Risk Map (Exhibit 5-17) (Washington State Department of Commerce, 2024). The No Action Alternative places a higher proportion of growth in areas with higher displacement risk. Alternatives 1 and 2 place a lower proportion and similar or lower overall number of units in these areas and include anti-displacement policies as part of the Comprehensive Plan periodic update.

Areas with high displacement risk and housing capacity under the No Action Alternative include 2, 3a, 3b,4, 5, 6, 7, and 8. In the Action Alternatives, areas of growth and high risk include 2, 6, 7, and 8.

Exhibit 5-17: New Housing Units in Displacement Risk Areas

	No Action	Alternative 1	Alternative 2
Units	9,400*	6,500	8,500
Percent of Units	32%*	14%	17%

**Note: The No Action is based on capacity only and does not account for feasibility of redevelopment, whereas Alternatives 1 and 2 include assumptions related to market feasibility and redevelopment.*

Source: BERK, 2025.

Land use mix can have an impact on wages due to the types of jobs that can be created in different districts. For example, a heavy industrial area would include capacity for manufacturing jobs, while a mixed-use area may include a combination of healthcare, retail, service industry, and professional services jobs. Data from the US Census provides average wages for a range of industries in the Portland metropolitan area (Exhibit 5-18) (U.S. Census Bureau, 2023).

While Alternatives 1 and 2 create many more jobs (47,500-51,800) than the No Action Alternative has capacity for (16,600 jobs), the overall average wage of new jobs is expected to be similar. All alternatives focus most of their new job growth in industrial and mixed use or commercial land use designations, making their average wages comparable. The Action Alternatives have better opportunities to adjust policies to encourage specific industries and workforce development, however.

Exhibit 5-18: Land Use and Job Mix

Place Type	Types of Jobs	Average Annual Wages
Heavy Industrial	Manufacturing	$77,000
Institutional/Campus	Public Administration, Education, Hospital	$85,000
Industrial Employment	Warehousing, Specialty Trade Contractors	$69,000
Low Scale Neighborhood	Retail, Food/Drink Services	$39,000
Medium Scale Neighborhood	Retail, Food/Drink Services	$39,000
Mixed Use	Healthcare, Retail, Food/Drink Services, Professional Services	$72,000
Regional Activity Center	Healthcare, Retail, Food/Drink Services, Professional Services	$72,000

Source: US Census, 2023.

Strategies

Features of the Alternatives

- The City's existing Housing Action Plan identifies strategies to increase housing supply and address affordability that would be implemented under all alternatives.
- The Action Alternatives include additional housing policies to ensure housing options for all income bands.
- The Action Alternatives include additional anti-displacement policies.

Other Considerations

City-Led Opportunities

- Pursue workforce development initiatives, small business assistance programs, and efforts to retain manufacturing, construction, and skilled trades jobs (see Appendix 3. Case Studies) *(related to Policy 162: Workforce Development and Career Pathways and Policy 24: Build a Resilient Economy)*.
- Help communicate home rehabilitation opportunities and radon testing options through City channels *(related to Policy 113: Reduce Environmental Health Disparities)*.

Partnership Opportunities

- Build on the work of CREDC and collaborate regionally to support the software and electronics, clean tech, life sciences, and technology-enhanced production sectors, which tend to be higher-paying industries. This could include a marketing campaign positioning Vancouver as a hub for innovation *(related to Policy 162: Workforce Development and Career Pathways and Policy 24: Build a Resilient Economy)*.

Tradeoffs and Cobenefits

Cobenefits

Several cobenefits and connections emerge when considering the relationships across metrics. Some features of the growth alternatives cascade into benefits across a range of health considerations. Others have cobenefits for emissions reduction ( ) or equity ( ).

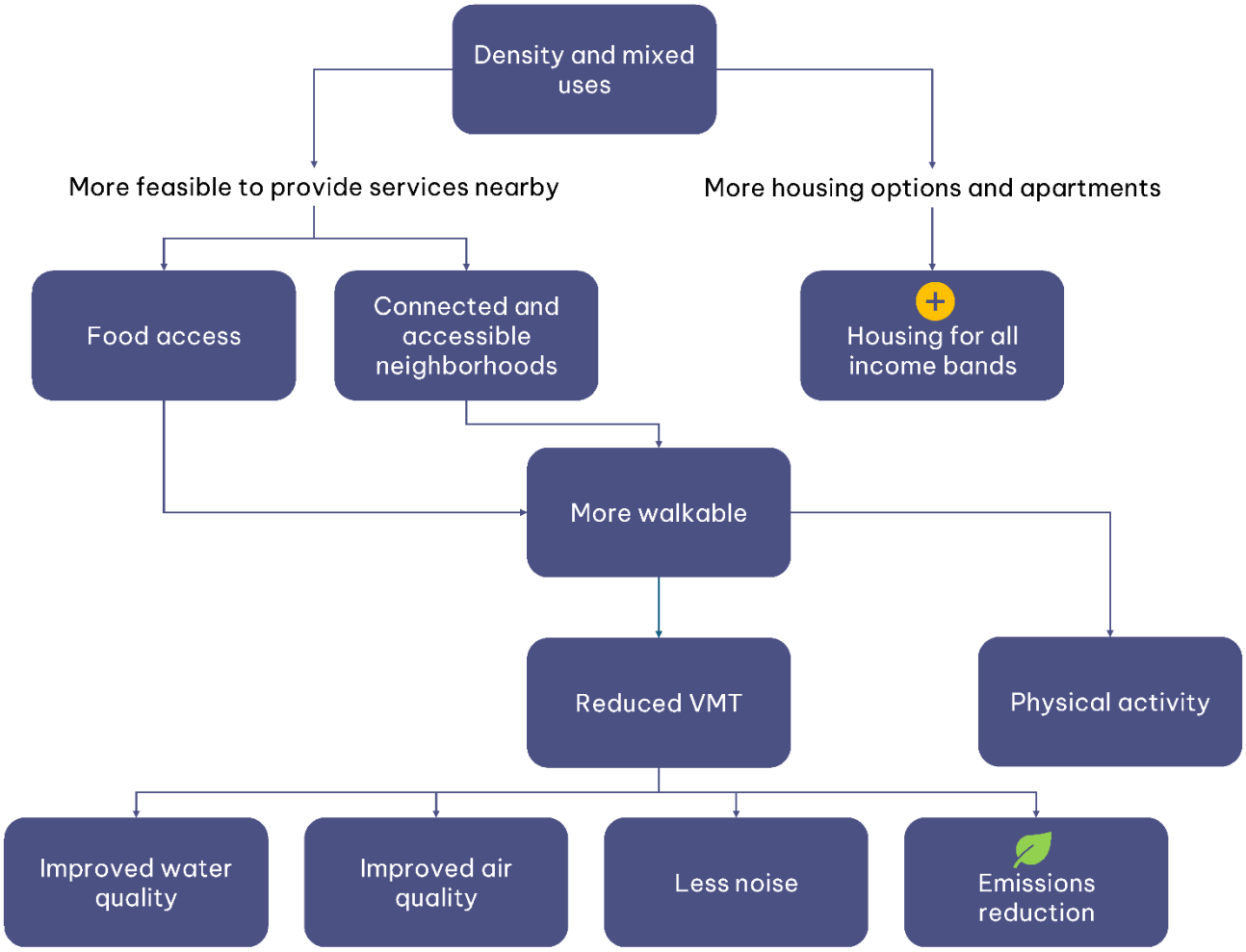
Density and Mixed Uses and Other Health Metrics

Density and mixed uses have connections to a range of other health topics (Exhibit 5-19). More density and opportunities for mixed use development make it more feasible for businesses to open new locations, creating more connected and accessible neighborhoods and better food access. These in turn create less reliance on driving, which can improve physical activity, and lower vehicle miles traveled (with air quality, noise, and emissions benefits).

Density also provides more housing options, including apartments and other housing types that are more likely to serve people making under the area median income.

Both Action Alternatives emphasize density and mixed uses, with Alternative 2 especially strong in this area.

Exhibit 5-19: Density and Mixed Uses and Other Health Metrics



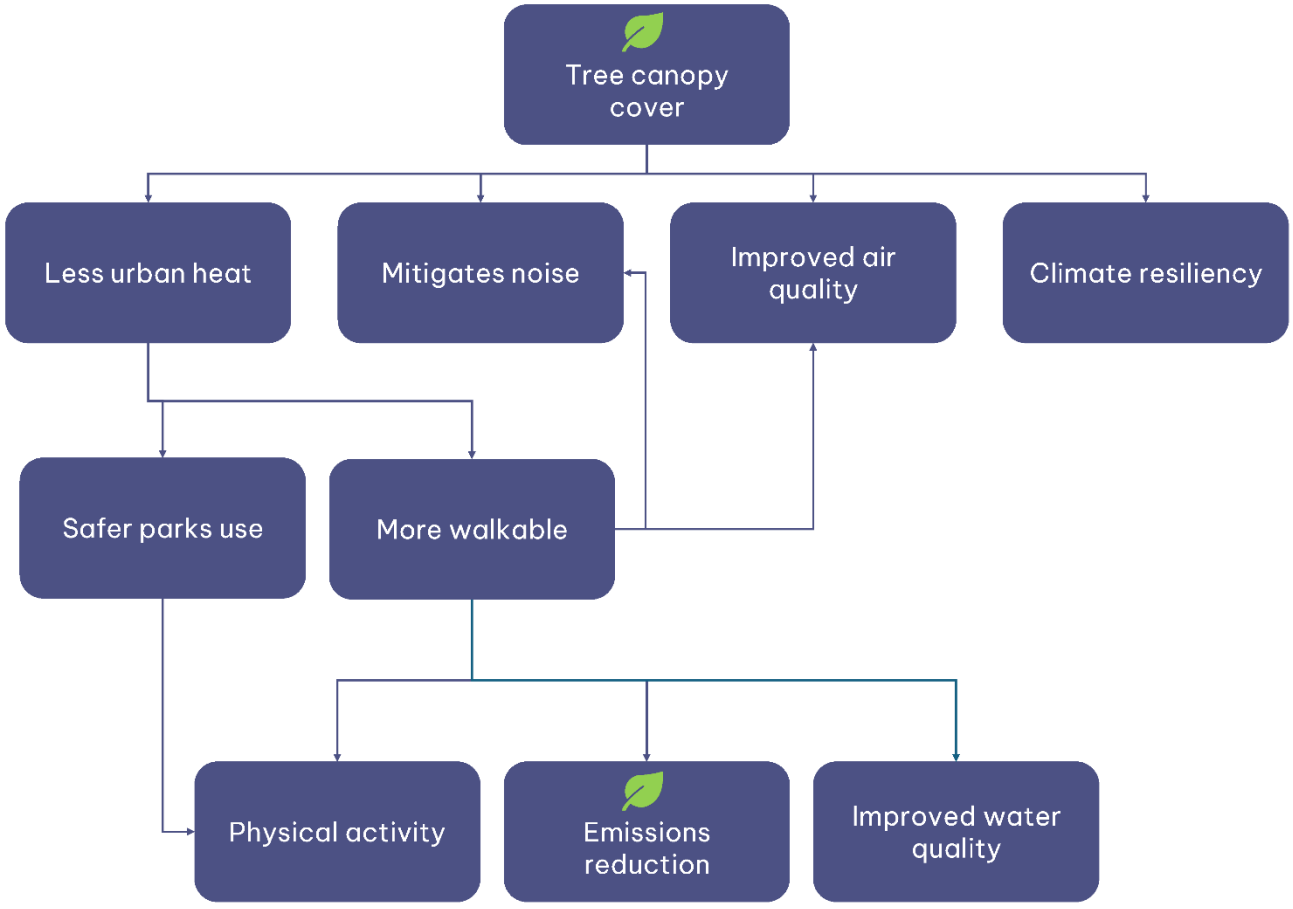
Source: BERK, 2025.

Tree Canopy Cover and Other Health Metrics

Tree canopy cover also has connections to other health topics (Exhibit 5-20). It helps to reduce urban heat, which makes parks safer to use and biking and walking safer modes of transportation in summer. This can result in more physical activity, as well as lower emissions and less noise from less vehicle use. Tree canopy cover also has direct benefits for mitigating noise, improving air quality, and improving climate resiliency to extreme precipitation as well as heat.

The Action Alternatives create more opportunities for expanded tree canopy cover by directing much of the growth in areas without existing trees, and through policy changes that support more tree canopy.

Exhibit 5-20: Tree Canopy Cover and Other Health Metrics



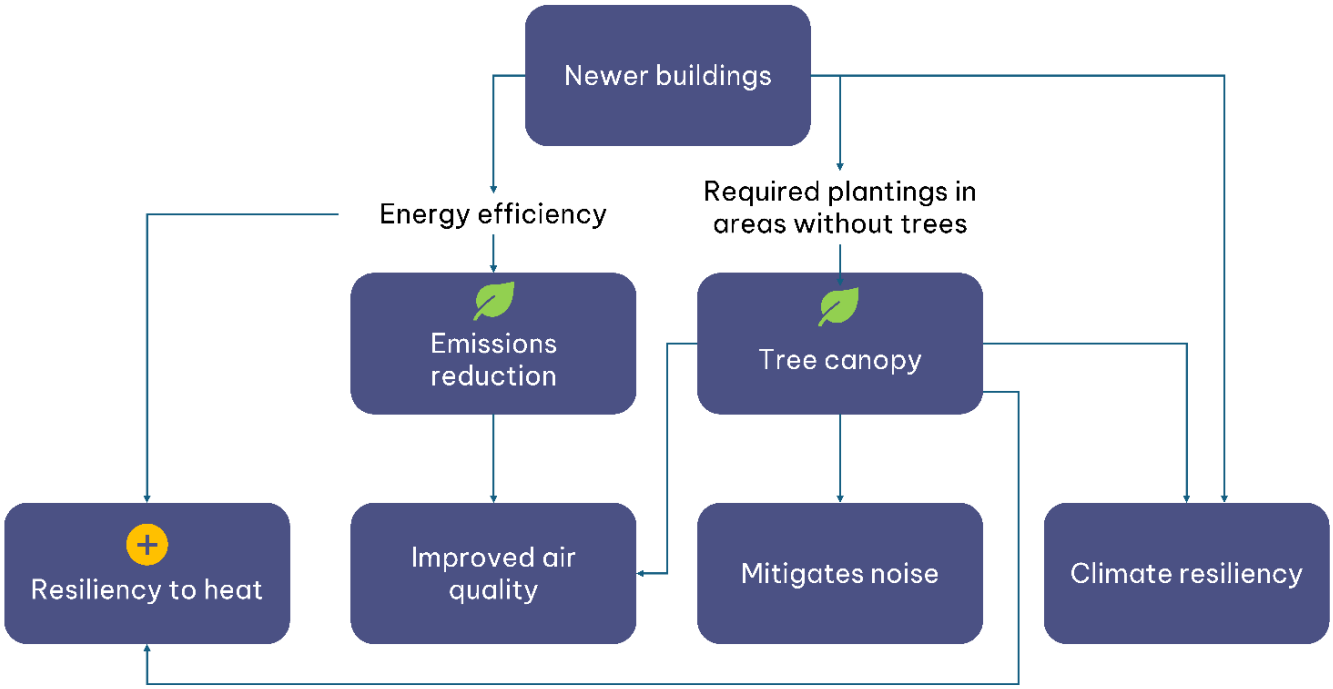
Source: BERK, 2025.

Newer Buildings and Other Health Metrics

An increase in the proportion of newer buildings can also relate to health metrics beyond exposure to health hazards (Exhibit 5-21). Newer buildings tend to be more energy efficient, which results in lower emissions and lower costs for air conditioning and filtration, with cobenefits for air quality. Lower energy costs have the equity cobenefit of making air conditioning more accessible in heat events. New development can also help increase the amount of vegetation in areas without much tree canopy cover, as it is required to include a certain amount of trees and green space. This has benefits in turn for air quality, heat, noise, and climate resiliency. Finally, newer buildings may be more resilient to climate impacts such as extreme precipitation, flooding, and fire.

The Action Alternatives result in more new buildings than the No Action Alternative.

Exhibit 5-21: Newer Buildings and Other Health Metrics



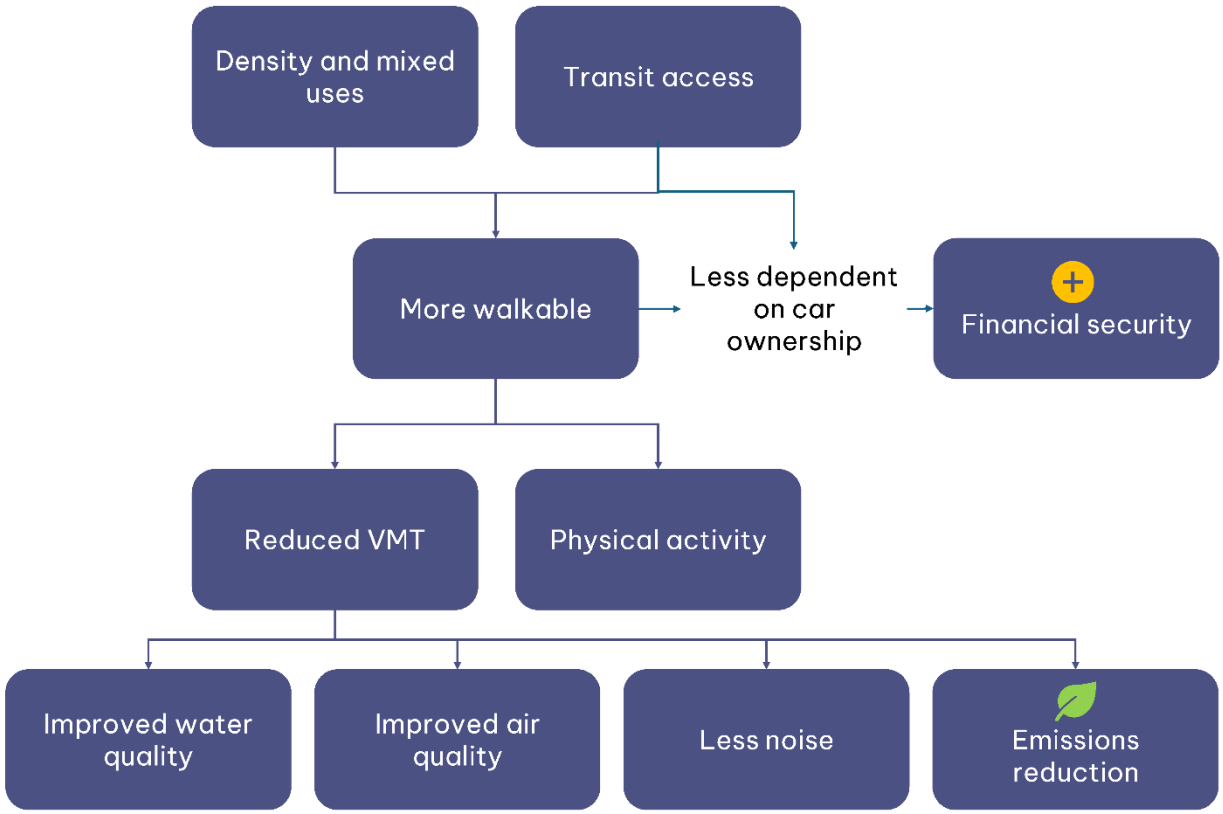
Source: BERK, 2025.

Density, Mixed Uses, and Transit Access

When combined, density, mixed uses, and transit access can have benefits for walkability, which has other health benefits itself (Exhibit 5-22). Transit-oriented development and mixed uses could result in more walking and biking trips for daily needs, and use of transit to reach other destinations. The additional walking to and from transit has benefits for physical activity. Transit access also has benefits for reducing vehicle dependency, resulting in improved air quality, less noise, and lower emissions.

The Action Alternatives emphasize density and mixed uses, and place growth in such a way that could be served by future transit lines, where transit doesn't currently exist. The No Action Alternative focuses on lower densities, which are also harder to serve with transit.

Exhibit 5-22: Density, Mixed Uses, and Transit Access



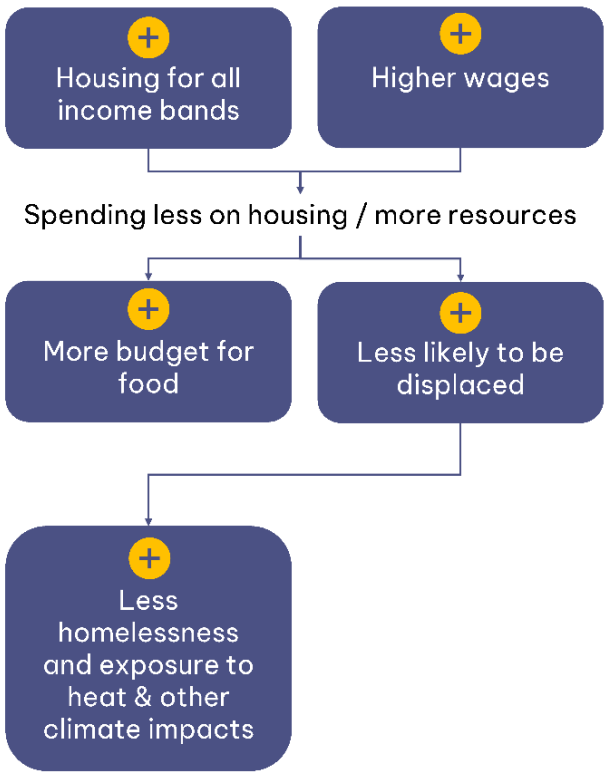
Source: BERK, 2025.

Housing Affordability and Higher Wages

When combined, housing affordability and higher wages can have far-reaching benefits to health (Exhibit 5-23). Spending less on housing and having more resources overall can lead to being able to afford more or healthier food, and lower displacement risk. This could also prevent homelessness for households that otherwise may be at risk, therefore also preventing exposure to heat and climate hazards.

The Action Alternatives include housing capacity for all income bands and policies to remove barriers to the development of that housing. While all alternatives have capacity for jobs at a similar average wage, **the Action Alternatives present an opportunity to encourage specific industries and workforce development programming, which could lead to higher wages over time**.

Exhibit 5-23: Housing Affordability and Higher Wages



Source: BERK, 2025.

Tradeoffs

Density, Newer Buildings, and Displacement

Some amount of older housing redevelopment and displacement will occur regardless of density allowances. However, if more density and flexibility is possible, development interest may grow. While there are health benefits associated with more density, it may also have impacts on residential and commercial displacement. Policies should be considered to ensure that new development includes housing units and commercial spaces that meet the needs of the businesses and households that are already in Vancouver.

The Action Alternatives include the greatest density and amount of newer buildings, which could lead to displacement impacts, however they also include the greatest mitigation opportunities.

6. Community Engagement Summary

This HIA included community engagement primarily in two ways. The HIA used findings from the 2024 Clark County Community Needs Assessment survey to understand baseline conditions for access to services. The HIA was also brought to two Climate Community Working Group meetings in August 2024 and September 2025. This group of representatives from various community organizations, convened as part of the Comprehensive Plan Periodic Update, provided input on initial findings and the full HIA draft.

7. Next Steps

As the City completes the 2025 Comprehensive Plan Periodic Update and associated environmental review, this HIA will assist decision makers in considering specific mitigation and policy actions. Vancouver will also select a "Preferred Alternative" based on the analysis in the HIA and DEIS, which will be carried forward in the adopted plan.

Policy 91: Monitoring Progress specifies that the City will "regularly review progress towards implementation of the Vancouver Comprehensive Plan goals and policies using the metrics identified for each policy." The City is also required to complete a 5-year progress report on the implementation of its Climate Element of the Comprehensive Plan. For Vancouver, this will be due in 2030. Many policies that relate to climate resiliency and emissions reduction are also related to health, so this will also be an opportunity to report on health-related outcomes of the plan.

Acronyms

ADU	Accessory Dwelling Unit
AMI	Area Median Income
BRT	Bus Rapid Transit
CAP	Criteria Air Pollutant
CDC	Centers for Disease Control
COPD	Chronic Obstructive Pulmonary Disorder
CREDC	Clark Regional Economic Development Council
CSA	Community Supported Agriculture
dBA	A-weighted decibels (unit of noise measurement)
DEIS	Draft Environmental Impact Statement
EBT	Electronic Benefits Transfer
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
HIA	Health Impact Assessment
NO2	Nitrous Dioxide
O_3	Ozone
PIF	Park Impact Fee
$PM_{2.5}$	Particulate Matter 2.5 (2.5 micrometers or less in diameter)
PUD	Public Utility District
SDOH	Social Determinants of Health
SEPA	State Environmental Policy Act (Washington State)
SNAP	Supplemental Nutritional Assistance Program
SR	State Route
USDOT	United States Department of Transportation
VMT	Vehicle Miles Traveled
WHO	World Health Organization
WSU	Washington State University

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Appendices

1. Current Health-Related Programs in Vancouver

Topic	City	County	School, Nonprofit, and Business Partners	Other
Physical Activity	Parks and trails system Parks planning Biking and walking infrastructure Transportation planning Community centers and programs	Walk, Run, Ride, or Roll website	School sports School facilities YMCA Private gyms	Private sports clubs Adult recreation league sports
Food Access	Community gardening Urban agriculture	Clark County SNAP-Ed Program	Free and reduced school lunches Clark County Food Bank and partners Farmers markets Supermarkets Urban Abundance programs CSAs	
Community Connections	Parks Community centers and programs Community events Community and Neighborhood Grants	Clark County Community Services	Schools Healthcare facilities Small businesses Social services Childcare Libraries	

Topic	City	County	School, Nonprofit, and Business Partners	Other
Exposure to Health Hazards	Tree canopy Water quality monitoring Emergency preparedness Climate resiliency planning Fire Police EMS	Heat Watch Project Clark Regional Emergency Services Agency Hazard mitigation planning	Healthcare facilities Social services Fourth Plain Forward Climate Adaptation Taskforce	Southwest Clean Air Agency Federal Superfund program
Housing and Financial Security	Planning for housing affordability Economic development planning	Columbia River Economic Development Council Property tax relief	Affordable housing providers Shelter providers Fourth Plain Forward Financial Education	Federal Housing Choice Vouchers

2. Tradeoffs and Cobenefits Matrix

→ Strategies that have magnified health benefits when combined

⇆ Strategies that may represent a health tradeoff when combined

Strategies have a magnified emissions reduction cobenefit when combined

Strategies have a magnified equity cobenefit when combined

\- No major connection

	Connected and accessible neighborhoods	**$PM_{2.5}$ and ozone**	**Noise**	**Urban heat**	**Housing in areas with older buildings**	**Greater % of new housing as apartments**	**Areas with high displacement risk**	**Proximity to parks**	**Proximity to supermarkets**	**Climate impacts**	**Proximity to transit**	**More jobs in higher wage sectors**	**Housing for all income bands**
Connected and accessible neighborhoods		→ More connected and accessible neighborhoods -> lower VMT -> lower air quality impacts	→ More connected and accessible neighborhoods -> lower VMT -> lower noise from traffic	Strategies that reduce urban heat + Connected and accessible neighborhoods = More comfortable to walk/bike -> lower VMT & emissions	-	→ Higher density -> more feasible to provide certain services, greater density of services -> more likely to result in connected and accessible neighborhoods	-	→ Better park access near housing -> supports connected and accessible neighborhoods	→ Proximity to supermarkets -> supports connected and accessible neighborhoods -> may result in desirable locations for new stores	→ Better access to services -> resiliency to climate impacts	Connected and accessible neighborhoods + proximity to transit = walkability locally and transit connections for longer distances, lower VMT & emissions	Higher wages + Proximity of housing and services/jobs = can afford to live closer to work and services, less time burden of commuting and daily errands -> lower VMT & emissions	Housing options at all income bands + Proximity of housing and services/jobs = can afford to live closer to work and services, less time burden of commuting and daily errands -> lower VMT & emissions

	Connected and accessible neighborhoods	$PM_{2.5}$ and ozone	Noise	Urban heat	Housing in areas with older buildings	Greater % of new housing as apartments	Areas with high displacement risk	Proximity to parks	Proximity to supermarkets	Climate impacts	Proximity to transit	More jobs in higher wage sectors	Housing for all income bands
$PM_{2.5}$ and ozone			→ Strategies to address transportation noise via VMT reduction -> Strategies to address air quality via VMT reduction	→ Greening urban heat areas -> improved air quality	→ Newer buildings -> better indoor air quality	→ Higher density -> lower VMT -> lower air quality impacts	-	→ More parks with trees and vegetation -> improved air quality Strategies that improve air quality -> parks more comfortable and safe to use	→ Easier to walk or bike to supermarkets -> lower VMT -> lower air quality impacts	→ Climate impacts -> worse air quality Some climate resiliency strategies (for example, more indoor recreation facilities, air conditioning, tree planting) -> air pollution mitigation	→ More people taking transit -> lower VMT -> lower air quality impacts	→ Higher wages -> can afford to live closer to work and services -> lower VMT -> lower air quality impacts	→ Housing options at all income bands -> can afford to live closer to work and services -> lower VMT -> lower air quality impacts
Noise					→ Newer buildings -> better noise mitigation	-	-	→ More parks with trees and vegetation -> mitigates noise	→ Easier to walk or bike to supermarkets -> lower VMT -> lower noise impacts	-	→ More people taking transit -> lower VMT -> lower noise impacts	→ Higher wages -> can afford to live closer to work and services -> lower VMT -> lower noise impacts	→ Housing options at all income bands -> can afford to live closer to work and services -> lower VMT -> lower noise impacts

	Connected and accessible neighborhoods	$PM_{2.5}$ and ozone	Noise	Urban heat	Housing in areas with older buildings	Greater % of new housing as apartments	Areas with high displacement risk	Proximity to parks	Proximity to supermarkets	Climate impacts	Proximity to transit	More jobs in higher wage sectors	Housing for all income bands
Urban heat					→ Newer buildings -> more efficient cooling	-	-	→ More parks with trees and vegetation -> cooling, refuge during heat events Strategies that reduce heat -> parks more comfortable and safe to use	-	→ Climate impacts -> more heat impacts Some climate resiliency strategies (for example, more indoor recreation facilities, air conditioning, tree planting) -> heat mitigation	-	→ + Higher wages -> greater adaptive capacity to heat impacts (for example, can afford air conditioning)	→ + Housing options at all income bands -> fewer people living unsheltered or in low quality housing -> better safety during heat events
Housing in areas with older buildings						-	→ Redevelopment in areas with older buildings -> likely impacts to displacement	-	-	→ Newer buildings -> potentially more resilient to climate impacts	-	-	⇆ Redevelopment in areas with older buildings -> loss of some naturally occurring affordable housing, housing for all income bands needs to balance various strategies for long-term needs

	Connected and accessible neighborhoods	$PM_{2.5}$ and ozone	Noise	Urban heat	Housing in areas with older buildings	Greater % of new housing as apartments	Areas with high displacement risk	Proximity to parks	Proximity to supermarkets	Climate impacts	Proximity to transit	More jobs in higher wage sectors	Housing for all income bands
Greater % of new housing as apartments							Short term: ⇄ Rezoning for higher densities -> land is more valuable and more likely to redevelop -> potential for displacement Long term: → Apartments more likely to provide housing for middle- and lower-income bands -> availability of housing options at all income levels mitigates displacement	-	→ Higher density -> may result in desirable locations for new stores	-	 Higher density + Proximity to transit = transit-oriented development -> lower VMT and emissions	 Higher wages + More housing options = can afford to live closer to work and services, less time burden of commuting and daily errands -> lower VMT & emissions	→ Apartments more likely to provide housing for middle- and lower-income bands -> availability of housing options at all income levels
Areas with high displacement risk								-	-	-	-	→ Higher wages -> less vulnerable to displacement	→ Housing options at all income bands -> households are less likely to be displaced; displaced households have somewhere to move to in the same city or neighborhood

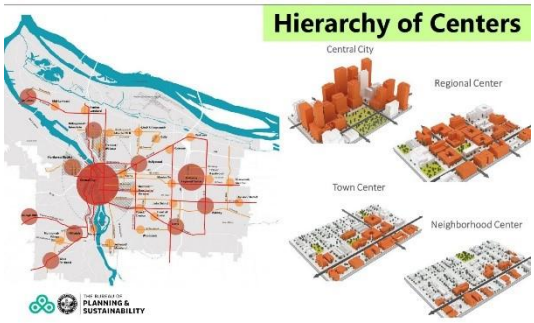
	Connected and accessible neighborhoods	$PM_{2.5}$ and ozone	Noise	Urban heat	Housing in areas with older buildings	Greater % of new housing as apartments	Areas with high displacement risk	Proximity to parks	Proximity to supermarkets	Climate impacts	Proximity to transit	More jobs in higher wage sectors	Housing for all income bands
Proximity to parks									-	→ More parks with trees and vegetation -> cooling, refuge during heat or other events Strategies that address climate resiliency -> parks more comfortable and safe to use	-	-	+ Housing options at all income bands + Proximity to parks = Households at all incomes can access health benefits of parks
Proximity to supermarkets										→ Better access to supermarkets -> resiliency to climate impacts (for example, ability to stock up on supplies prior to a potential power outage or other event)	-	+ Higher wages -> greater ability to afford foods, less dependent on “budget” stores	+ Housing options at all income bands -> less budget spent on housing, more available for food Housing options at all income bands + Better access to supermarkets -> Households at all incomes have good access to supermarkets

	Connected and accessible neighborhoods	$PM_{2.5}$ and ozone	Noise	Urban heat	Housing in areas with older buildings	Greater % of new housing as apartments	Areas with high displacement risk	Proximity to parks	Proximity to supermarkets	Climate impacts	Proximity to transit	More jobs in higher wage sectors	Housing for all income bands
Climate impacts											-	→ + Higher wages -> greater adaptive capacity to climate impacts (for example, can afford air conditioning, home retrofits, etc.)	→ + Housing options at all income bands -> fewer people living unsheltered or in low quality housing -> better safety during climate events
Proximity to transit												+ leaf Higher wages -> Can afford to live where more transit options available -> lower VMT & emissions	+ leaf Housing options at all income bands -> Can afford to live where more transit options available -> lower VMT & emissions
More jobs in higher wage sectors													+ leaf Higher wages + Housing options at all income bands = can afford to live closer to work and services, less time burden of commuting and daily errands -> lower VMT & emissions
Housing for all income bands													

3. Case Studies

Examples of health-related initiatives in other parts of the Pacific Northwest and United States provide insights into potential strategies for Vancouver.

Connected and accessible neighborhoods

Description	Examples	Potential Policy/ Strategy for Vancouver
Ability to have a range of housing types for all ages and incomes in where people can easily walk or bike to groceries, cafes, shops and services, healthcare, schools and open space. Articles and Studies: • Can 15-Minute Cities Work in America? Bloomberg article on MIT Study, February 2024 • NLC: Exploring the 15-Minute City Concept and Its Potential for Communities of All Sizes, June 2023 • NAR: Implementing 15-Minute Cities: Where to Start? April 2021	**Portland, Oregon** 20-minute neighborhood concept since 2010: expanding pedestrian and bicycle infrastructure and trails, redesigning streets for community use, investing in arts and culture facilities as incubators and building affordable housing. Hierarchy of Centers for 15-minute City, July 2023, CNU, Portland, Oregon.  *Lessons Learned:* Thesis, University of Washington, 2022, comparing Portland 2010 and 2020 and increase in accessibility across numerous metrics, but still higher VMT. **Olympia, Washington**: City of Olympia is updating its neighborhood centers strategy, April 2024. Five centers were identified for potential success across metrics in 2022: Jolt News, July 2022. Issue has been lack of street connectivity and sidewalk infrastructure: Jolt News, April 2024. **Low cost, rapid implementation, pop-up businesses/retail incubator programs** for BIPOC businesses, arts/culture: • Downtown Bothell Pop Shops on Main • Seattle Waterfront Promenade Pop Ups • Seattle Small Businesses in Vacant Storefronts	Land Use Alternatives addressing nodes and housing types, coordinated with transportation, and parks and recreation plans. Flexibility in neighborhood commercial spaces (short term program to fill vacant spaces or add pop-ups; longer term code to require or incentivize small spaces, limit parking for small businesses).

Growth near transit

Description	Examples	Potential Policy/ Strategy
Promote active living by helping to improve pedestrian, bicycling, and transit spaces. People may not walk, bicycle, or take transit because they may be unsafe, unavailable, or unreliable. Better infrastructure means people have more ways to get regular physical activity. Promoting transit-oriented development such as increased housing density in places with existing/ planned transit can support the success of more frequent transit. Articles and Studies: • Relationships between density, transit, and household expenditures in small urban areas, 2020 • Minneapolis St Paul, Density & Activity Near Transit, Local Planning Handbook, 2018	Portland (OR) Metro, Transit-Oriented Development Program: Grants, site acquisition, and partnerships to build housing along transit; cut sheets for several years; strategic plan 2023. Spokane TOD Framework Study (2022): The study identifies recommendations for aligning policies, regulations, and investments in public infrastructure along Spokane's current and future high-frequency transit corridors and includes plans for integrated TOD and multi-modal access within a portion of the rapid transit line. Redmond 2050 continues to focus growth on Redmond's centers in a way that addresses needs and goals related to equity, sustainability, and resiliency. The City has developed increased floor area ratios, densities, and identified multimodal improvements around station areas, as well as developing fast-track permitting tools (planned action, infill exemption). Mountlake Terrace Municipal Code Ch. 19.50: Lists regulations and standards to implement a vision for the town center as a blend of attractive transit-oriented uses connected to the light rail transit station, civic campus, and surrounding neighborhoods. Light rail station underway with public and private development: Herald article, April 2024	Use Transportation System Plan and Active Trip Potential to identify best locations for improvements in non-motorized access. Prioritize equity in access, safety, and efficiency in the Capital Facility Plan in the allocation of resources. Promote greater mixed uses and densities in proximity to transit.

Park and recreation access

Description	Examples	Potential Policy/ Strategy
Increase access to parks within a 10-15 minute walk to promote active living and health. Articles and Studies: • Trust for Public Land, Parks Promote Health, 2023. with Creative Strategies to Address Gaps reviewing 100 communities • National Park and Recreation Association, Parks and an Equitable Recovery, 2021 • NRPA, Greening Without Gentrification, November 26, 2019	Improving Systems to Achieve Equitable Park Access: Using Policy to Overcome Acquisition Challenges in Tukwila, Washington, with new equity policy and tax levy. Other communities in examples. NYC Community Parks Initiative: Addresses targeted investments and programming across neighborhoods with equity focus. Chicago Green Schoolyards Program Case Study: City Parks Alliance. Partnership with schools to improve playgrounds in underserved areas.  Puget Sound Regional Council, Stormwater Parks program. Seattle linear parks/ green infrastructure. Aspen Institute's Project Play team reports on how well youth are being served in defined geographic areas, across country including Seattle-King County, Tacoma-Pierce County: Only 19% of Pierce County youth receive 60 minutes of daily physical activity , below the national (24%) and state (23%) averages. The State of Play-Pierce County advisory group aspires to increase Pierce County's physical activity rate to at least the national average, if not higher, through collective and individual actions.	Address equity and park investments in Capital Facilities Plan through levels of service on distribution, quality, and amount. Leverage schools and stormwater or other public facilities to add park and recreation facilities that can serve as hubs and create multiple funding and implementation streams. Engage neighborhoods in tactical short-term as well as long term phased park improvements especially in underserved areas. Optimize the open space already in hand, such as streets and alleyways, schoolyards, and brownfield redevelopment. Develop anti-displacement strategies related to park and green infrastructure.

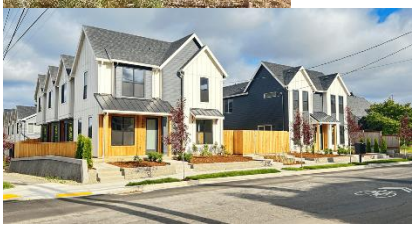
Heat island mitigation

Description	Examples	Potential Policy/ Strategy
Increase resilience to extreme heat. Recognize health impacts to sensitive populations. Adapt urban environments through canopy cover, pavement/roof treatments, and smart growth. Articles and Studies: • EPA Heat Island Cooling Strategies • EPA Reduce Heat Island Effect	Sacramento Metropolitan, 2019, Urban Heat Island Mitigation Plan: Pilot projects, best practices, implementation mechanisms across West Coast. Vegetation cover, cool pavement, cool and green roofs, electric vehicles, and smart growth. *Example Portland Eco Roof*  Heat Island Community Actions Database, August 2023: EPA database of examples of policies, codes, and programs across country. Can filter examples. Redmond 2050 updates to Green Building Incentive Program (RZC 21.67). LEED Heat Island Reduction Measures: Sustainable Sites.	Enhance Vancouver Urban Forestry Program and implement Management Plan Address building and street adaptations for cool/green roofs and pavement.

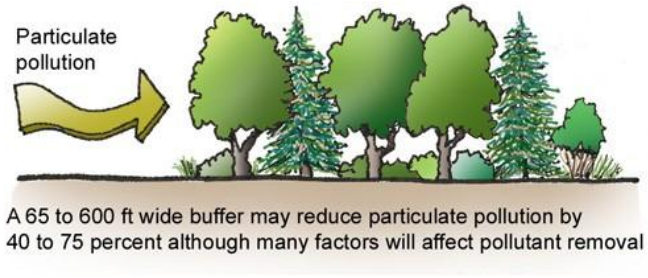
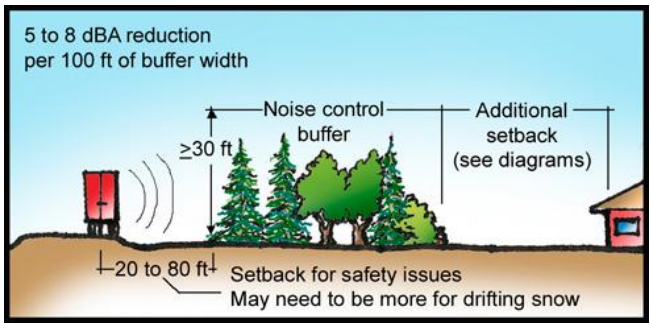
Tree canopy, urban shade, landscaping, green infrastructure

Description	Examples	Potential Policy/ Strategy
Natural and built solutions that decrease temperatures and improve water quality in an urban environment. **Tree Canopy:** Tree canopy covers the ground and shades the area below it. **Green Infrastructure**: Stormwater management systems that mimic nature's ability to soak up and store water. Articles and Studies: • Urban Greening, Climate Action for Healthy People, Healthy Places, Healthy Planet: Urban Greening & Green Infrastructure, Climate Change and Health, 2016 • Building green infrastructure to enhance urban resilience to climate change and pandemics, 2021 • Green Infrastructure and Gentrification: Harness the Benefits, Avoid the Displacement, by Renee Mazurek, Apr 24, 2023	King Conservation District, Puget Sound Urban Tree Canopy and Stormwater Management Handbook, 2021. Port of Seattle, Student engagement model, tree canopy enhancement projects, June 2022. City of Clovis, Urban Greening Master Plan, 2015 and Fontana Urban Greening Master Plan, ASLA Award, 2020: Green Streets and Places.  Denver Green Infrastructure Implementation Plan.	Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities. (Menu of Measures). Provide temporary or permanent shade structures in parks or in rights of way to supplement the shade capacity of newly planted trees. Develop or modify design standards to integrate exterior building features that reduce the impacts of climate change and increase resilience. (Menu of Measures).

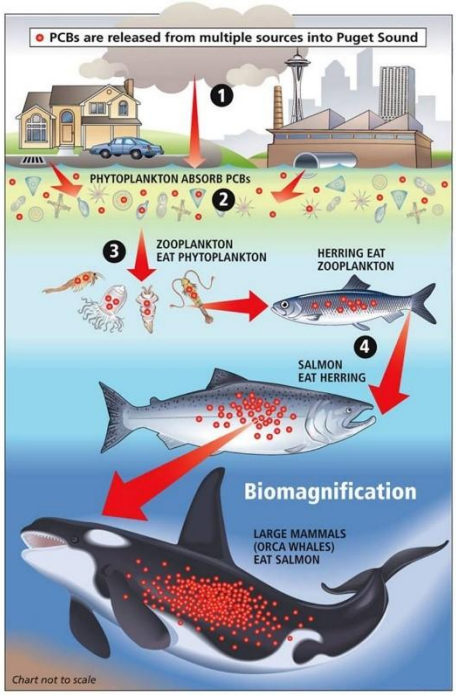
Mixed uses and Housing variety

Description	Examples	Potential Policy/ Strategy
Increase opportunities for physical activity, reduced greenhouse gases, and improved community connections through mixed use neighborhoods. Increase access to housing ownership and affordability. Increase amenities that support quality of life. Articles and Studies: • What is a Mixed-Use Neighborhood?, Blue Zones 2020 • Impacts of Affordable Housing on Health, Center for Housing Policy, 2015 *[See also Connected and accessible neighborhoods and Growth near transit]*	Middle Housing in 6 cities, Sacramento, Portland, Minneapolis.   Title X: Middle Housing Toolkit: Objective Design + Development Standards (ODDS), Puget Sound Region. Expanding affordable housing opportunities, case studies: Policy and zoning. Port Orchard Municipal Code Sec. 20.139.055: Provides side-by-side duplex and attached house design standards (July 2024). ULI Case Studies: Select mixed use or district/corridor, and cities.	Land Use Alternatives, focusing on mixed uses in focal points as well as middle housing implementation across low density residential areas. Consider inclusionary housing and regulatory incentives for mixed use and infill housing (density or FAR bonuses, SEPA infill exemptions, MFTE, etc. per housing needs assessment and housing action plan).

Buffering from highways / Reduce air and noise pollution

Description	Examples	Potential Policy/ Strategy
Address right of way treatments and abutting site and building design to reduce exposure to air pollution and noise due to high volume roadways. Articles and Studies: • EPA, Living Close to Roadways: Health Concerns and Mitigation Strategies • Urban Institute, The Polluted Life Near the Highway, 2022 • University of Washington Mobile Observations of Ultrafine Particles (MOV-UP) study • Noise abatement requirements under HUD in areas subject to noise	Air Quality and Land Use Planning, 2023: Review of Literature by Bellevue, with Mitigation Strategies – land use (limiting sensitive uses), urban design, barriers/walls/vegetation, highway lids, building design and ventilation. USDA Air Quality and Conservation Buffers: Manual to enhance visual quality, control noise levels, control air pollutants and odor.  A 65 to 600 ft wide buffer may reduce particulate pollution by 40 to 75 percent although many factors will affect pollutant removal  Community Air Action Planning, Oregon: New program. West Oakland Community Action Plan: Community led, addressing port and industrial area. Has annual reports and monitoring. Tacoma Air Quality Pilot Program: Test prototype air sensors for potential for measurable observations that can be compared to Tacoma's Equity Index.	Adapt urban landscape to reduce exposure of overburdened populations and sensitive uses to air pollution and noise through vegetation, site, and building design. Create opportunities for community led action plans to address needs of communities in subareas near industrial, port, and highway locations.

Water pollution

Description	Examples	Potential Policy/ Strategy
Implement land use strategies to minimize water pollution and reduce contamination. Articles and Studies: • Water Quality: Agencies Should Take More Actions to Manage Risks from Harmful Algal Blooms and Hypoxia, 2022 • Water Infrastructure: Technical Assistance and Climate Resilience Planning Could Help Utilities Prepare for Potential Climate Change Impacts, 2020 • Urban Water: Strategies That Work, 2013	King County Clean Water Healthy Habitat Strategic Plan, 2020.  *Source: Impact of Water Pollution on the Environment State of Salmon, n.d.* Adopt a Storm Drain – Sweep Up, Rake Up, Pick Up, Tacoma: Individuals, organizations and businesses can participate to adopt a storm drain in their neighborhood and commit to keeping it clear of litter, debris, and pollution. The program's goal is to reduce stormwater pollution.	Collaborate with WSU Vancouver Extension and utilize their Water Research Center through staying up to date on water quality trends in the state. Create educational opportunities for residents to learn about proper disposal of household chemicals and water quality best practices.

Conservation of forest and agricultural land, urban farms and forests

Description	Examples	Potential Policy/ Strategy
Protection of contiguous forest canopy and urban farms in cities to provide ecosystem services and food security. Urban farms are likely privately owned and larger than a community garden. Community forests may have recreation elements, but a primary goal is conservation of larger forest patches in urban area. Articles and Studies: • MRSC, Local Government-Supported Urban Agriculture Adds Equity and Climate Change Benefits for the Public, May 2024 • Healthy Food Policy, Project, Zoning for Urban Agriculture, 2024 • DNR's Urban and Community Forestry program	**Kitsap County**: Port Gamble Heritage Park Master Plan, 2011-2021, 3500 acres. **Clark County:** 78th Street Heritage Farm Master Plan, 2020-2024.  NRCS: Urban Agriculture and Climate Change in the Northwest, includes Village Gardens, **Portland.** Community Forest Lands (ACFL): **Anacortes,** Washington. 	Enhance Vancouver Urban Forestry Program and implement Management Plan. Promote urban agriculture with zoning allowances and incentives. Consider models of affordable housing and agriculture ("agrihood").

Community gardens

Description	Examples	Potential Policy/ Strategy
Implement a community garden program to promote community wellbeing, resiliency of local food systems, and support environmental stewardship. Articles and Studies: • Public Health Benefits of Community Gardens, 2024 • Community gardens and their effects on diet, health, psychosocial and community outcomes: a systematic review, 2022 • Community Gardening: Stress, Well-Being, and Resilience Potentials, 2020	P-Patch Gardening Program, Seattle. Community Garden Program, Bellingham. Community Garden Program, Auburn.  Community Gardens, Tigard, Oregon.	Encourage the expansion and maintenance of community gardens by ensuring equitable access to land and offering educational resources for new gardeners.

Healthy streets

Description	Examples	Potential Policy/ Strategy
Open more public spaces for people to use by closing streets to pass through traffic. Closed streets are open to people walking, biking, and playing. This initiative improves community connections and individual health. Articles and Studies: • Rethinking Streets to Drive Commerce and Connection – Not Just Cars, 2024 • Ditch Cars for Open – and Equal – Streets, 2022 • The Benefits of Closing a Street, 2017	Healthy Streets, Seattle. Healthy Streets, Bellevue. Safe Streets, Spokane. Slow Street Program, San Francisco. Open Streets, New York. Open Streets, Washington, D.C.  	Implement Main Street pilot program to close residential streets to through traffic. Closed streets may improve safety for people walking, biking, and playing and enhance community connection. Consider utilizing the Safe Streets and Roads for All Grant Program to finance the pilot program.

Emergency shelter spaces, resilience hubs, neighborhood meeting points

Description	Examples	Potential Policy/ Strategy
Provide temporary daytime or overnight shelter or resources to protect community members. Articles and Studies: • MRSC, Severe Weather Shelters for Winter and Beyond, 2022 • Severe Weather Shelters, Washington State Resources • Urban Sustainability Directors Network, Resilience Hubs	Clark Regional Emergency Services Agency (CRESA). Hazard Sheltering, Spokane. Extreme Heat and Cooling Centers, Snohomish County.  Seattle, Citywide Resilience Hub Plan. Resilience Hub Pilot Project, Washington D.C.	Consider partnering with local libraries and schools to provide emergency cooling and heating shelters. Develop resilience hubs — community-serving facilities that are designed to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life. (Menu of Measures)

Food access

Description	Examples	Potential Policy/ Strategy
Neighborhoods or places where access to affordable, healthy food options (especially fresh fruits and vegetables) is restricted or nonexistent. Articles and Studies: • Food Insecurity among the Overall Population in Clark County, 2019 • Downtown Vancouver's Block 10: The Grocery Gap, 2019 • Assessment of Healthy Food Availability in Washington State–Questioning the Food Desert Paradigm, 2017 • Characteristics and Influential Factors of Food Deserts, 2012	• What 5 Cities are Doing to Change the Way America Eats, January 2016. • Farmbrite, Combating Food Deserts: How Some US States Are Leading the Way, December 2023. • Clark Food & Farm Network.	Review and amend existing zoning policies that restrict supermarket development in areas with low access to fresh and healthy foods. Partner with faith-based and neighborhood organizations to provide healthy and fresh food. Prioritize areas with the greatest need. Utilize Vancouver's Local Food Action Plan. Explore converting underutilized public land to urban farms. Consider allowing mobile farmers markets and food trucks to serve more neighborhoods.

Access to healthcare and social services

Description	Examples	Potential Policy/ Strategy
Clark County, Community Health Assessment and Improvement Plan: *Access to health care means having "the timely use of personal health services to achieve the best health outcomes." Access to health care consists of four components: ● Insurance coverage: insured people are more likely to receive medical care and less likely to have poor health status; ● Primary care provider: having a usual source of care is associated with adults receiving recommended screening and prevention services; ● Timeliness: ability to get health care when the need is recognized; and ● Workforce: capable, qualified, culturally competent providers.* US Department of Health and Human Services, Access to Health Services, Healthy People 2030: *Social services are programs and services that improve the wellbeing of individuals, families, and communities.*	Parkland-Spanaway Blue Zones Project, with MultiCare, Virginia Mason, and Pierce County. Includes Life Radius Approach. 	Through partnerships with Clark County Health, distribution of Vancouver's human services funding, and land use growth strategy that improves access to health, social, recreational, and food resources.

OUR VANCOUVER

OUR FUTURE **2045**

COMMUNITY PARTNERSHIP FRAMEWORK

Prepared by WSP

December 18 , 2023

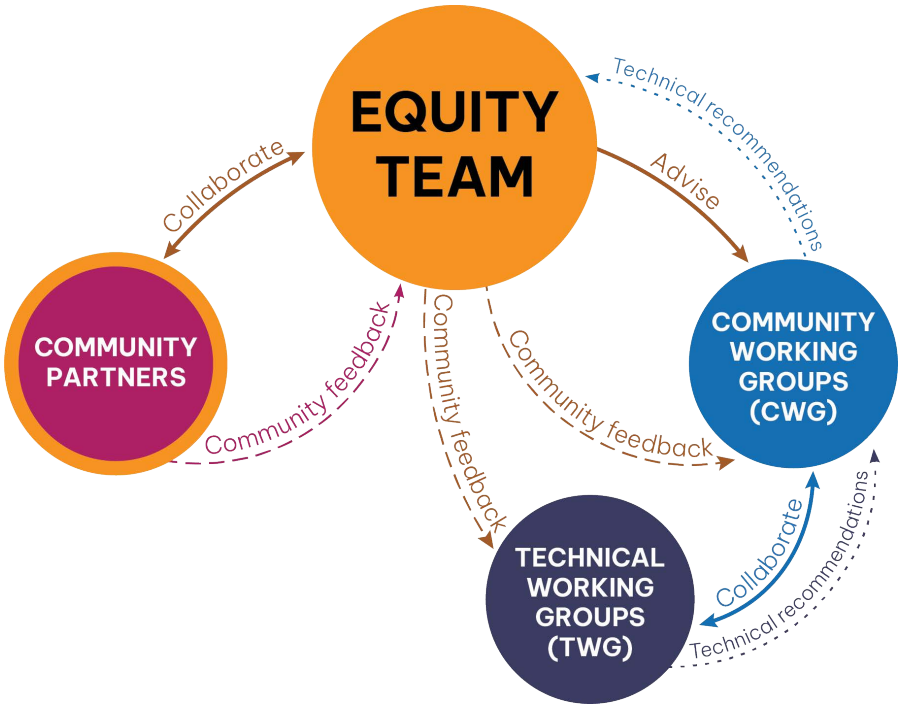
OUR VANCOUVER is a three-year initiative where community members and the City will embark on a co-creative process to update the City's Comprehensive Plan and Title 20 of the City's Municipal Code. The OUR VANCOUVER Public Involvement Plan is a strategic document that outlines the methods and strategies for engaging and involving the public in the decision-making processes, policy development, and project implementation. Through this process, the City is committed to equity, transparency, and meaningful engagement with the public to foster trust and create equitable outcomes for all Vancouver residents.

This framework summarizes the co-creative process described in the Public Involvement Plan, the key advisory groups engaged in the project, the public involvement goals, the tools that will be used throughout the project to engage community members, how input will be tracked and inform the process, and a general schedule of engagement events. Additional details are provided in the Public Involvement Plan.

Co-Creative Process

As part of the project's commitment to engage in a co-creative process and center equitable engagement, the project team has implemented strategies to partner with community representatives. These **Community Partners** have deep connections with local communities and strong existing relationships that will help facilitate engagement and lead to a co-creative process. Community Partners help facilitate engagement, bridge communication gaps, and provide valuable insights into the needs and priorities of the communities they serve.

Co-creation through the comprehensive plan update means Community Partners work directly with the project team as members of the OUR VANCOUVER Equity Team and as community engagement liaisons to facilitate conversations with community members and lead "Envision Events" (described further below). Co-creation will shift power dynamics and give community members a direct link to influence the technical analysis and policy development included in the comprehensive plan.



The **Equity Team** includes Community Partners and project team staff. Their role is to ensure integration between the technical recommendations, community feedback and the OUR VANCOUVER Equity Framework. The Equity Team will review technical recommendations, analyze community feedback collected during Envision Events and report back to the project team to ensure equity is centered throughout the project and community priorities are amplified, evaluated, and included, to the extent possible, in the final plan.

There will be multiple **Community Working Groups** focused on topic areas consistent with the comprehensive plan elements (i.e. Climate, Housing, Economic Development, etc.). Community Working Groups will collaborate with the Technical Working Groups to identify and share technical recommendations with the Equity Team. The Community Working Groups will include partner agency staff, community representatives, service providers, business owners, advocacy organizations, and other interested parties that have expertise or knowledge in these topic areas that will help inform the technical analysis and plan development.

The **Technical Working Groups** will include city and consultant technical staff, and technical agency partners. Technical Working Groups will be topic-area focused (housing, land use, transportation, public services, etc.) and meetings

will occur throughout the project to inform existing conditions analyses and drive the technical work.

Public Involvement Goals

1. Establish a co-creative process between the City and the Vancouver community that shifts power dynamics and elevates the voices of equity-priority communities.
2. Build trust through transparent two-way communication channels that humanize the project, advance community knowledge, create community ownership, and build long-lasting relationships.
3. Emphasize Vancouver pride to highlight future benefits at a personal, community, and city level to encourage participation throughout the process.
4. Establish comprehensive plan policies that are reflective of community and agency input and will advance the implementation of the plan.

Communication and Engagement Tools

The table below identifies the communications and engagement tools that will be used specific to each audience involved in the comprehensive plan update process. The communications and engagement tools are divided into three categories:

- **Informational tools:** designed as one-way communication to deliver information about the project to all interested parties.
- **Envision Events:** is a broad term used to describe in-person and online events to engage the community during each project phase. Envision Events seek to inform people about the project and gather feedback to shape the vision, land use possibilities, and policy development and implementation. Envision events will be designed to reach and collect feedback from a broad swath of the community, with an emphasis on equity-priority communities.
- **Meetings:** designed to collect and report out on input received. Project working and advisory groups will be internal to the project. Planning Commission and City Council meetings and workshops will be external and provide additional opportunities for public input.

Key Audience	Informational Tools				Envision Events		Meetings			
	Emails	Social media	Paid media	Earned media	Be Heard	In-person events	Community Working Group Meetings	Equity Team Meetings	Technical Working Group Meetings	PC/CC Workshops/ Meetings
Equity priority communities*	X	X	X	X	X	X		X		X
Local Businesses	X	X	X	X	X	X				X
Neighborhood Associations	X	X			X	X				X
General Public	X	X	X	X	X	X				X
Community Partners	X	X			X	X	X	X		X
Equity Team	X	X					X	X	X	X
Project Team Staff (City and Consultant)	X	X	X	X	X	X	X	X	X	X
City Elected and Appointed Officials	X				X	X				X
Community Working Group	X						X	X	X	X
Technical Working Group	X								X	X

*Equity-priority communities are those that have historically been excluded from or who have not participated in City planning processes. For a full list of groups, see the project's Equity Framework.
PC = Planning Commission
CC = City Council

Digital Engagement

The Be Heard website (https://www.beheardvancouver.org/plan2045) will be used throughout the project to share information about the process, details on upcoming events, and to interact with the community. Project information and engagement tools will be updated and added to the Be Heard website at key milestones. OUR VANCOUVER will leverage existing City of Vancouver social

media channels to inform the public of project milestones, public-facing events, and opportunities to provide feedback.

Data Analysis, Reporting, and Evaluation

The OUR VANCOUVER Accountability Matrix has been designed to collect data and feedback throughout the planning process. The matrix will track comments received by mail, email, at community events, and at Envision Events. The accountability matrix will be updated following events and reviewed with Community Partners to ensure underrepresented communities are being engaged and their feedback prioritized. This information will be used by the Technical Working Groups to ensure community feedback is being incorporated into planning scenarios. The final matrix will be included as an appendix to the Comprehensive Plan Update.

Evaluation surveys will be administered before and after Envision Events to ensure participants find the information relevant and accessible.

PUBLIC INVOLVEMENT PLAN

June 2023, updated March 2024

About the Public Involvement Plan

OUR VANCOUVER is a three-year initiative where community members and the city will work together to update the city's Comprehensive Plan and Title 20 of the city's Municipal Code. The OUR VANCOUVER Public Involvement Plan is a strategic document that outlines the methods and strategies for engaging and involving the public in the decision-making processes, policy development, and project implementation. Through this process, the city is committed to equity, transparency, and meaningful engagement with the public to foster trust and create equitable outcomes for all Vancouver residents.

The purpose of this Public Involvement Plan is to outline a public involvement process that meets the intent of the GMA requirement for early and continuous public participation (RCW 36.70A.140) and clearly articulates the approach to co-creating the plan with members of the community. The Plan includes public involvement goals, the approach and process for community engagement, an overview of public engagement tools to be used, the process for tracking and integrating feedback, and the role of the Planning Commission and City Council in making recommendations and final decisions about the Comprehensive Plan.

Public Involvement Goals

1. Establish a co-creative process between the city and the Vancouver community that shifts power dynamics and elevates the voices of equity-priority communities. Co-creation means developing possibilities, polices and implementation steps together, in a way that makes clear and documents how community voice helps create options and is reflected in final decisions.
2. Build trust through transparent two-way communication channels that humanize the project, advance community knowledge, create community ownership, and build long-lasting relationships.
3. Emphasize Vancouver pride to highlight future benefits at a personal, community, and city level to encourage participation throughout the process.
4. Establish comprehensive plan policies that are reflective of community and agency input and will advance implementation of the plan.

Community Engagement Approach

Public Involvement Phases

Community engagement and outreach will be sequenced around key project milestones to ensure that conversations with the public are meaningful and occur at intervals where feedback can be considered and incorporated into the plan update. The three project phases are briefly described below. Additional details on the tools used in each phase are included in the Engagement Tools section.

Phase 1: Visioning

During this phase, the project team will focus on project awareness, introducing the project to the community, and collecting community input to lead to an overall comprehensive plan vision and individual vision statements for each comprehensive plan element (housing, transportation, climate, etc.). Project informational materials, such as factsheets, postcards, and other small project collateral will be distributed by city and project team staff at community events where the city is already engaging the public. Staff will facilitate informal conversations with community members to understand their values and vision for the future. Feedback will be shared across the project team at team meetings and with Community Partners as part of their onboarding process.

Phase 2: Land Use Possibilities

The land use possibilities phase will include interactive workshops and Envision Events (described further below) designed to develop and solicit feedback on land use possibilities.

The first step in the land use possibilities phase is developing a set of land use possibilities as 3-dimensional models that reflect the community's vision in the urban form. Development of these models will be based on feedback gathered through Phase 1 and through mapping workshops designed to gather community input on land use preferences. The project will engage the community in several mapping workshops, including the Vancouver community broadly, neighborhood associations, community organizations, local schools and youth-focused organizations, community working groups established for the project, and other equity-priority communities.

The second step in the land use possibilities phase is gathering feedback on the 3-dimensional land use models. Outreach during this phase will include Envision Events, including small group conversations with community-based organizations, tabling events, and digital engagement, like surveys and online maps through Be Heard Vancouver, as well as meetings with technical working groups and community working groups. During this phase, the project team will work to show how the different land use possibilities could change how

community members navigate and live in the city. Visualizations and storytelling will be used to provide concrete examples of what the city could look like in the future and what that will mean for the community.

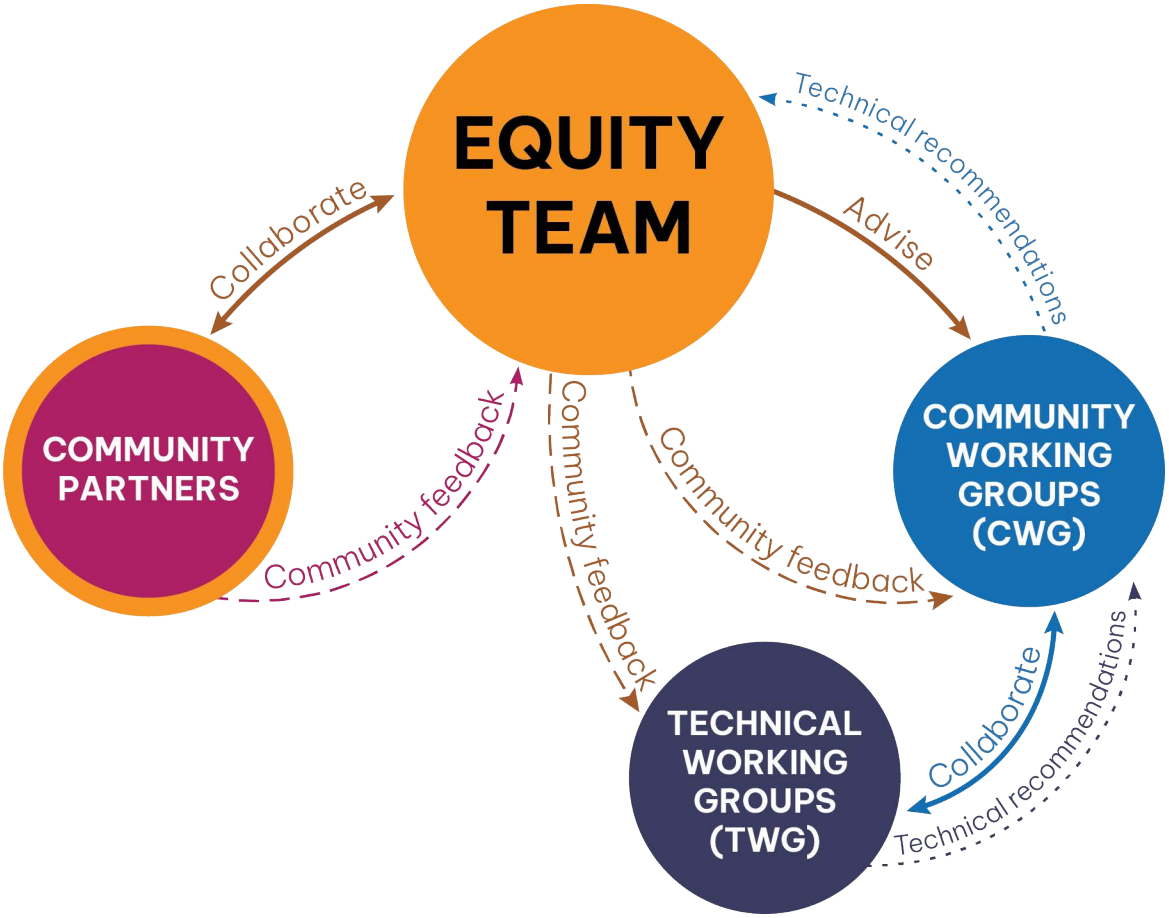
Phase 3: Policy Development/Implementation

The policy development/implementation phase will focus on reporting back and demonstrating how community input was reflected in plan policies and code development. Materials prepared will identify the connections between the community's vision and feedback on land use possibilities and comprehensive plan policies and implementation measures.

Co-Creative Process

As part of the project's commitment to engage in a co-creative process and center equitable engagement, the project team has implemented strategies to partner with community representatives. These **Community Partners** have deep connections with local communities and strong existing relationships that will help facilitate engagement and lead to a co-creative process. Community Partners help facilitate engagement, bridge communication gaps, and provide valuable insights into the needs and priorities of the communities they serve.

Co-creation through the comprehensive plan update means Community Partners work directly with the project team as members of the OUR VANCOUVER Equity Team and as community engagement liaisons to facilitate conversations with community members and lead "Envision Events" (described further below). Co-creation will shift power dynamics and give community members a direct link to influence the technical analysis and policy development included in the comprehensive plan at the outset, rather than just being asked to respond to staff generated content.



The **Equity Team** includes Community Partners and project team staff. Their role is to ensure integration between the technical recommendations, community feedback and the OUR VANCOUVER Equity Framework. The Equity Team will review technical recommendations, analyze community feedback collected during Envision Events and report back to the project team to ensure equity is centered throughout the project and community priorities are amplified, evaluated, and included, to the fullest extent possible, in the final plan.

There will be multiple **Community Working Groups** focused on topic areas consistent with the comprehensive plan elements (i.e. Climate, Housing, Economic Development, etc.). Community Working Groups will collaborate with the Technical Working Groups to identify and share technical recommendations with the Equity Team. The Community Working Groups will include partner agency staff, community representatives, service providers, business owners, advocacy organizations, and other interested parties that have expertise or knowledge in these topic areas that will help inform the technical analysis and plan development.

The **Technical Working Groups** will include city and consultant technical staff, and technical agency partners. Technical Working Groups will be topic-area focused (housing, land use,

transportation, public services, etc.) and meetings will occur throughout the project to inform existing conditions analyses and drive the technical work.

Communication and Engagement Tools

The table below identifies the communications and engagement tools specific to each audience involved in the comprehensive plan update process. The communications and engagement tools are divided into three categories:

- **Informational tools**: designed as one-way communication to raise awareness and deliver information about the project to all interested parties.
- **Envision Events**: is a broad term used to describe in-person and online events to engage the community during each project phase. Envision Events seek to inform people about the project and gather feedback to shape the vision, land use possibilities, and policy development and implementation. Envision Events will be designed to reach and collect feedback from a broad swath of the community, with an emphasis on equity-priority communities.
- **Meetings**: designed to collect and report out on input received. Project working and advisory groups will be internal to the project. Planning Commission and City Council meetings and workshops will be external and provide additional opportunities for public input.

	Informational Tools				Envision Events		Meetings			
Key Audience	Emails	Social media	Paid media	Earned media	Be Heard	In-person events	Community Working Group Meetings	Equity Team Meetings	Technical Working Group Meetings	PC/CC Workshops / Meetings
Equity priority communities*	X	X	X	X	X	X		X		X
Local Businesses	X	X	X	X	X	X				X
Neighborhood Associations	X	X			X	X				X
General Public	X	X	X	X	X	X				X
Community Partners	X	X			X	X	X	X		X
Equity Team	X	X					X	X	X	X
Project Team Staff (City and Consultant)	X	X	X	X	X	X	X	X	X	X

City Elected and Appointed Officials	X				X	X				X
Community Working Group	X						X	X	X	X
Technical Working Group	X								X	X

*Equity-priority communities are those that have historically been excluded from or who have not participated in city planning processes. For a full list of groups, see the project's Equity Framework.
PC = Planning Commission
CC = City Council

Informational Tools

Digital Engagement

Website: The Be Heard website (https://www.beheardvancouver.org/plan2045) will be used throughout the project to share information about the process, details on upcoming events, and to interact with the community. Project information and engagement tools will be updated and added to the Be Heard website at key milestones. The website will also provide an option to sign up for project emails through a subscription form and an email address to reach city staff.

Emails: The project team will distribute email communication out to the public through established listservs and a project-specific list generated through sign ups at events and on Be Heard. Email communication may include project updates, event information, and public engagement opportunity announcements.

Social Media: OUR VANCOUVER will also leverage existing City of Vancouver social media channels to inform the public of project milestones, public-facing events, and opportunities to provide feedback.

Paid and Earned Media: Earned and paid media are critical tools to amplify outreach efforts and increase project awareness and visibility. The project team may engage with local news media outlets, including non-English language media and trade publications and support the development of news releases as the project progresses.

Offline Engagement

In order to reach community members that are not online, it is important to share information in a variety of ways. The following strategies will be employed:

- Promote in-person events through offline channels like local non-profit and neighborhood association newsletters, community bulletin boards at libraries, word of mouth and/or flyers at local businesses.
- Work with Community Partners and Community-based Organizations to share information with their networks at partner organization events and through one-on-one conversations.
- Use non-invasive tactile urbanism methods to engage people in the built environment and facilitate observing their surroundings in a new way.
- In person presentations and conversations with a variety of technical and community working groups.
- Small group discussions coordinated through different organizations and advocacy groups.

Envision Events

Envision Events is a broad term used to describe in-person and online engagement opportunities during each project phase and gain feedback to shape the vision, land use possibilities, policy development, and implementation. These events will be sequenced around key project milestones to ensure we are asking meaningful questions that allow community members to influence the development of the Comprehensive Plan. For example, during the land use possibilities phase of the project, Envision Events will ask the community to weigh in on what the city could look like in the future, where new housing or commercial centers may be located, and the changes that are expected in the city over the next 20 years.

A key approach to ensure equitable community engagement and outreach is meeting people where they are. Envision Events will occur throughout the city at places where people gather. Envision Events may be conversations and interactive exercises at community events throughout the city, informal Community Partner-led conversations with their neighbors or networks, large community open houses, event partnerships with community-based organizations, and/or presentations to community organizations or neighborhood associations. Envision Events will also include a digital component with interactive surveys or features on Be Heard.

Envision Events will be advertised using the informational tools described in the previous section in advance of the event (at least 10 days but often more, depending on the audience).

Meetings

Meetings are designed to collect and report out on input received. Project working and advisory groups will be internal to the project. Planning Commission and City Council

meetings and workshops will be external and provide additional opportunities for public input.

Meetings will be advertised using the informational tools described in the previous section at least 10 days before the meeting.

Incorporating Community Feedback

An important part of the project is ensuring that we are leading with equity and that the final adopted Comprehensive Plan and Land Use Code updates include community identified priorities and emphasize the development of an equitable future for Vancouver residents.

To ensure that the priorities flagged by the community are considered in the planning process, the Community Engagement Team, in close coordination with selected Community Partners, will track all stakeholder comments in an accountability matrix.

The OUR VANCOUVER Accountability Matrix has been designed to collect data and feedback throughout the planning process. The matrix will track comments received by mail, email, at community events, and at Envision Events. The accountability matrix will be a living document that will be updated regularly throughout the life of the project, when it will be finalized and included as an appendix to the Comprehensive Plan Update. The accountability matrix will track outreach and engagement efforts conducted by the project team; and comments and key themes from community members received by email, phone or mail, at community workshops, at tabling events, via digital engagement tools, and in organic conversations conducted by Community Partners. Comments and key themes will be summarized at key project milestones and shared with Community Partners, Community Working Groups, Technical Working Groups, advisory bodies and policymakers, and the community at large. Community Partners and all the various working groups will review and consider this feedback as they make plan and policy recommendations. How public feedback is incorporated into recommendations will also be tracked in the accountability matrix.

Planning Commission and City Council Review and Approval

The Planning Commission and City Council will be involved throughout the process with workshops and public hearings held at key milestones. The Planning Commission will review materials and make recommendations to the City Council, who has the ultimate approval authority over the final comprehensive plan document. Planning Commission and City Council workshops and hearings are open to the public and will be advertised on the project Be Heard page, the project mailing list, and various other communication channels.

OUR VANCOUVER

OUR FUTURE **2045**

GOALS FRAMEWORK

December 18 , 2023

Introduction

The City of Vancouver's Comprehensive Plan is an important tool that helps us navigate and plan for the future. The plan provides the overall long-term vision and policy direction needed to manage the built and natural environment in Vancouver and provide necessary public facilities needed to achieve that vision. The reality of long-term policy making in our community is recognizing that there is a wide range of complex, interconnected systems that influence how our community looks, operates, feels and functions, including market forces, federal and statewide policy, changing demographic and socioeconomic conditions, among other factors that will change over time. Within these larger forces there are areas where the City can shape and influence outcomes, like the delivery of municipal infrastructure and urban services, constructing, repairing, and maintaining roads, providing municipal services like water, sewer, fire and police protection, as well as parks & recreation programs and arts and cultural services. The City also administers land use policy and takes an active role in reviewing Vancouver's residential, commercial and industrial development for building safety, appearance, design, and function.

In these areas where the City can influence outcomes, Vancouver's next Comprehensive Plan, called **OUR VANCOUVER** will define the goals, policies, and implementation measures to guide the growth and development of our community over the next 20 years, with 2045 identified as the year for realizing the vision set forth in the plan. The City acknowledges that it has a deep responsibility to ensure that the intended and potential unintended consequences of policies developed through the Comprehensive Plan benefit community members that have typically been historically underrepresented, excluded or negatively impacted from public decision-making processes. Because of this, a specific equity focus has been integrated into the goals framework, to ensure insights and perspectives from these communities are emphasized and uplifted.

The last time the Plan was updated was **2011**, and since then, there have been significant demographic and socioeconomic changes that have occured in our community.

How has our community changed since the last plan?

- ↑ 18% Population increase
- ↑ 64% Communities of color increase
- ↑ 34% Median income increase
- ↑ 174% Average home value increase

What is a Goals Framework?

The goals framework for the Comprehensive Plan will help to define the structure and organization by which we go about designing more specific goals, policies and implementation measures throughout the plan development process. The framework includes 12 chapters in which categories of policies will be integrated, as well as a set of key themes that will inform more specific goals in subsequent phases of the planning process.

What elements are legally mandated by law?

The Growth Management Act specifies mandatory elements that Cities in the State of Washington are legally required to integrate into their Comprehensive Plans. For Cities, this includes land use, housing, capital facilities, utilities, transportation, economic development, parks and recreation, and climate change and resiliency. As you read the goals framework, you will notice a number of chapters and elements that are included that aren't mandated by state law. These additional chapters were informed during the plan scoping process, the initial phase of community engagement, and input from the Community Partners - who are the core committee of City residents tasked with co-creating the plan with the City.

How was the Framework Developed?

The basis of the Goals Framework is the plan's vision statement – which was the result of a detailed visioning process which engaged more than 1,015 community members between June 2022 and February 2023. During this process, community members were asked about their hopes, needs and concerns, and their big ideas for the future of Vancouver. Some of the most frequently mentioned concerns included public safety, economic opportunity (jobs, business development and growth), housing affordability, houselessness, and climate change. These themes were reviewed with the City's Strategic Plan Advisory Committee, and then incorporated into a vision statement for the Comprehensive Plan. The plan vision statement serves as the basis from which all other goals and policies in the plan are developed, and helped to prioritize additional elements to integrate into the framework, beyond what's legally mandated by state law. The Community Partners - who are the core committee of City residents tasked with co-creating the plan with the City, also played a major role in forming the goals framework - particurlarly in developing more detailed vision statements for each of the plan elements, which will serve as the foundation for the land use alternatives and policy development phases of the plan. They provided input on the community partnership framework, and established the equity priority outcomes in the equity framework, which heavily influenced the goals framework structure, which is shown below.

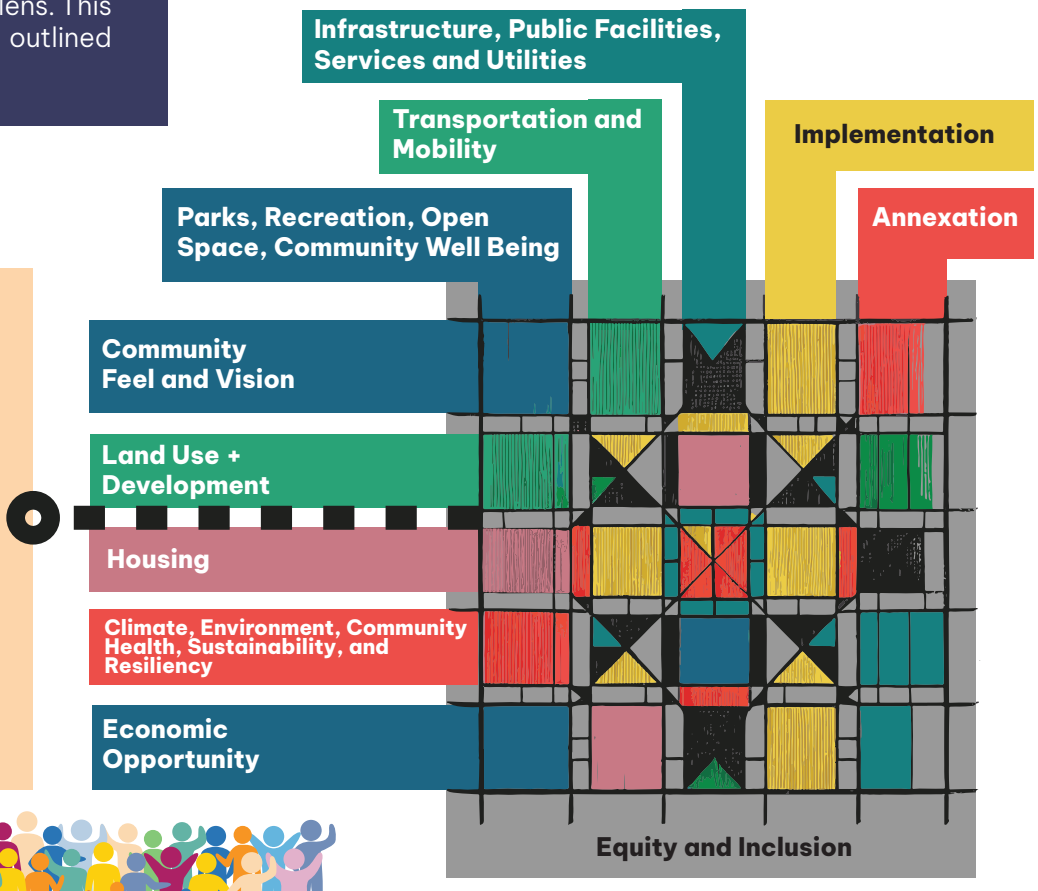
Equity

The graphic of the goals framework shown below represents a quilt, where the different elements of the Goals Framework of the Comprehensive Plan are weaved together. Equity represents the base fabric in which all of the plan elements are weaved into, symbolizing the approach of integrating equity into all aspects of policy development. The Goals Framework includes a chapter specific to equity and inclusion with goals and policies that will be developed, but all elements of the Goals Framework are evaluated through an equity lens. This is consistent with the approach outlined in the plan's equity framework.

Plan Vision Statement

"Vancouver is an equitable and prosperous community, which ensures that all residents, businesses and organizations benefit from the growth and advancement we make together. Vancouver will be recognized for our quality of life, as evidenced by affordable housing in vibrant, safe and walkable neighborhoods, access to jobs and economic opportunity for all, and resilience to the impacts of climate change."





Goals Framework

The framework for the plan includes chapters, represented in **bold text**, along with the key themes and desired community outcomes that will guide the development of more specific goals during the policy development phase of the planning effort.

1. **Introduction.** City's Core Values, Focus Areas.
2. **Community Feel and Vision.** Inclusive, Affordable, Safe, Vibrant, Accessible, Prosperous, Livable.
3. **Land Use and Development.** 15-minute neighborhoods, access to jobs & essential spaces, healthy, connected, resilient, harmony between built and natural environment.
4. **Housing.** Affordable, Accessible, Choice, diversity in sizes and types, Universal Design, Culturally Appropriate, Neighborhood Cohesion, reduce houselessness, Homeownership and opportunities for wealth creation.
5. **Equity and Inclusion.** Inclusive, Reparative , Promote health and wellness, Universal Access to Resources, Nurturing and Valuing All People.
6. **Climate, Environment, Community Health, Sustainability, and Resiliency.** Equitable and Just Transition, Increase Tree Canopy, Decrease Emissions, Community Preparedness, Community Stewardship and Resilience, Holistic Cycles of Consumption and Production, Access to Healthy Food, Built Environment Promotes Health.
7. **Economic Opportunity.** Support Business and Industry, Job Growth, Facilitate Startups and Innovation, Resilient Green Economy, Equitable Access, Wealth Creation, Access to Childcare.
8. **Parks, Recreation, Open Space, and Community Well Being.** Increase access, More Trails and Green Spaces, Inclusive and Safe Public Spaces, Climate Adaptation, Native Plants and Species, Increase Health Opportunities Through Recreation, Diversity in Amenities, Youth Programming.
9. **Transportation and Mobility.** Reliable, Frequent, Safe, Accessible, Equitable, Multi-Modal, Climate Friendly, Enhanced Transit, Regional Connectivity.
10. **Infrastructure, Public Facilities and Services and Utilities.** Utilize Existing Infrastructure, Expand Services and Programs, Equity Lens, Community Safety, Green Infrastructure.
11. **Annexation.** Sustainable Growth, Maintain Levels of Service.
12. **Implementation.** Actionable Policies, Alignment with Strategic Plan, Local and Regional Coordination, Accountability.

ENGAGEMENT AND OUTREACH SUMMARY

April 2026

Introduction

OUR VANCOUVER is a multiyear engagement initiative that took place between early 2023 to June 2026, where community members and the City of Vancouver worked together to update the City's Comprehensive Plan and Title 20 of the Vancouver Municipal Code. This timeframe allowed for in-depth community engagement and helped the project team ensure alignment with City and community priorities as well as State legislation. The engagement summaries in this appendix outline engagement methods and feedback by project phase:

- Phase 1: Visioning
- Phase 2: Land Use Alternatives
    - Community Mapping Activities
    - Land Use Alternatives
    - Draft Environmental Impact Statement (Draft EIS) Comment Period
- Phase 3: Draft Plan and Code

Overall community feedback is summarized and noted in a call-out box in each respective chapter of the Comprehensive Plan.

By the Numbers

The following stats help show the overall scope of community engagement and outreach that was conducted as part of the Comprehensive Plan and Zoning Code Update:

- 2,000+ people directly engaged through:
    - 104 public and small-group meetings and events, including:
        - 1 Community Housing Forum
        - 4 Community Mapping Activities
        - 4 Experience Our Vancouver 2045 events on the Draft Environmental Impact Statement
        - 4 Community Presentations on the Draft Plan and Code

        - 29 tabling events
        - 12 Vancouver Neighborhood Alliance and neighborhood association meetings
        - 3 NAYA Elders Luncheons
        - 3 Resilience Rising events
        - 1 Empower Vancouver Mini-conference with SWEC and OWI Education Services
        - 1 Zine and Collage Workshop
    - 26 Our Vancouver Community Partner meetings, plus 14 breakout sessions
    - 44 Our Vancouver Community Working Group meetings:
        - Business Leaders group
        - Climate group
        - Community-Based Organizations group
        - Housing - Building Industry Association group, Market-rate Housing group, and Affordable Housing group
        - Transportation group
    - 12 City Board and Commission meetings with:
        - City Center Redevelopment Authority
        - Parks and Recreation Advisory Commission
        - Transportation and Mobility Commission
        - Urban Forestry Commission
- 2,000+ ideas and input shared through:
    - 270 completed visioning tags
    - 150 map pins on online map
    - 1,017 community survey responses
    - 65 maps from in-person and virtual mapping activities
    - 409 Draft EIS comments through form, email, voicemail, mail
    - 150 Draft Plan and Code feedback through Community Presentations, form, and email
- 10,000+ visits to Be Heard – the main webpage for Our Vancouver
- 16,500+ views of the StoryMap – an additional interactive webpage that was used to share information about the Alternatives, Draft EIS, Preferred Alternative, and draft plan and code.
- Up to 970 subscribers reached through 65+ Our Vancouver e-newsletters
- Additional community members were reached and notified of Our Vancouver through:

    - 11 Vancouver Connects City e-newsletters, 14 Office of Neighborhoods City e-newsletters, 110+ social media posts across 4 platforms, flyers at 40+ locations and events, 200+ direct emails, three Citywide mailed newsletters, local news coverage, and a video played at 3 community events and on the government access cable channel (CVTV).
- 26 City Council Workshops, 5 City Council Consent items, 1 City Council Public Hearing, 22 Planning Commission Workshops and 1 Planning Commission Public Hearing, plus two joint City Council-Planning Commission workshops, where members of the public could provide public testimony.

PHASE 1: VISIONING ENGAGEMENT AND OUTREACH SUMMARY

Spring 2023–Winter 2024

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Introduction

Purpose of Engagement Summary

- Summarize engagement feedback and input from community to be incorporated into Comprehensive Plan.
- Report how feedback is being utilized as part of Comprehensive Plan development process, including metrics and outcomes.

Overall Approach to Outreach and Engagement

- Various methods of outreach and engagement were utilized with a dual purpose of collecting feedback and input and informing the community about the project for engagement and educational efforts.
- Targeted outreach methods were used to reach priority communities by collaborating with local community-based-organizations and local leaders.
- Social Media Kits included content in both written and visual formats and were shared with multiple CBOs and partners across the City for educational purposes and participation recruitment.
- Ongoing engagement with Russian, Spanish, and Vietnamese speakers, people with lower incomes, people with disabilities, and people experiencing houselessness was facilitated by Community Engagement Liaisons.

Who Was Engaged?

The Community Survey generated responses from a variety of community members:

- Most respondents were residents of Vancouver.
- Hispanic and Black respondents were under-represented, while Native and Asian respondents had greater representation compared to the population of Vancouver.
- Youth and adults under 35 were under-represented while older adults and elders were over-represented in the survey.
- Respondents came from a wide range of income brackets.

Demographic information was provided by 7 of 31 respondents on the Be Heard Pin Map. Respondents that provided demographic information were adults and predominantly white.

Demographic information was not collected at in-person engagement events. The project team attended several Summer 2023 Community Envision Events that attracted diverse representation from the community, including BIPOC, non-native English speakers, LGBTQ+, youth, and low-income community members.

Community Partners consist of local leaders affiliated with organizations serving BIPOC, queer, youth, immigrant communities, transit users, and people with disabilities.

During Phase I, the project team started working with partner organization to identify co-conveners and potential participants for the community working group process, initial meetings of these groups kicked off in Phase II of the project. Six community working groups were formed with the following focus:

- Business Leaders, co-convened with Identity Clark County and the Greater Vancouver Chamber of Commerce
- Housing working group, includes providers, developers, builders and advocates
- Climate working group, includes community members engaged in climate and environmental justice work
- Transportation working group, includes community members focused on increased transportation access and safer mobility
- Building Industry Association of Clark County, Legislative Affairs Committee, includes regional builders
- Leaders of Community Based Organizations that serve equity priority communities, including BIPOC, people with lower incomes, people with disabilities, people exiting the criminal justice system, and advocates for housing and healthcare access.

Data Collection

- Quantitative data was collected in the community survey, spatial analysis of pin maps, and survey questionnaires to Community Partners.

- Qualitative data was collected through conversations at tabling events, pin map comments, survey open ended questions, working group discussions, field notes, and questionnaires.

Analysis Methods

- Mixed methods of both qualitative and quantitative analysis were used for triangulation when reviewing data.
- The project team considered Sense of Place as a key theory driving analysis when exploring themes related to community input in relation to not only the expressed physical space needs of the City but also the reasoning and values behind them.
- Grounded theory was used to identify and organize key themes from engagement by pulling out input and feedback grounded in the data rather than assumptions of answers from biased project team perspectives.

Overview of Engagement Events

This section provides a quick overview of the Engagement Events that occurred during Phase 1 engagement for the Our Vancouver Comprehensive Plan project. Individual engagement summaries provide for more detailed information about each event and are available by request by email at ourvancouver2045@cityofvancouver.us

Summer 2023 Community Envision Events

- **Date(s):** May 2023 – October 2023
- **Engagement Method:** Tabling Events
- **Purpose:** City Envisioning
- **Participation:** 19 total events, over 850 direct conversations
- **Outreach Methods Used:** Be Heard, Social Media
- **Topics Covered:** Vision for future of Vancouver

Interactive Be Heard Pin Map

- **Date(s):** August 2023 – February 2024
- **Engagement Method:** Online Pin Map
- **Purpose:** City Envisioning
- **Participation:** 150 pins, 31 unique visitors
- **Outreach Methods Used:** Be Heard, Social Media, Tabling

- **Topics Covered:** Arts & culture, essential services, housing, community vision, parks & recreation, transportation

Housing Forum Open House Event

- **Date(s):** December 6, 2023
- **Engagement Method:** Presentation and Group Discussions
- **Purpose**: Educate community about new state level housing requirements and discuss implementation preferences within the Comprehensive Plan.
- **Participation:** ~50 attendees
- **Outreach Methods Used:** Social media, Community network of 40 contacts, Flyers
- **Topics Covered:** Current state of Vancouver housing and Vancouver's Housing Action Plan, State Housing Regulations, Affordable Housing, Middle Housing, Homeownership, Multi-Family Housing Development, New State Laws and Regulations and General Comprehensive Plan

Our Vancouver Community Survey

- **Date(s):** December 2023 – March 2024
- **Engagement Method:** Online Survey
- **Purpose:** City Envisioning
- **Participation:** 1,017 responses
- **Outreach Methods Used:** Be Heard, social media, canvassing, community events, newsletters, flyers, Community Engagement Liaison contacts
- **Topics Covered:** Neighborhood, housing, community health & well-being

Community Partners Meetings

- **Date(s):** 8 meetings between June 2023 to January 2024 specifically focused on Phase 1
- **Engagement Method:** Meetings, storytelling, questionnaire
- **Purpose:** Gather local leaders input on comprehensive planning and expand engagement of equity priority communities.
- **Participation:** 13 local leaders
- **Topics Covered:** Equity Analysis, Equity Framework, Community Partnership Framework and Goals Framework including Chapter Vision Statements

Our Vancouver Email Inbox

This mailbox is managed internally by some City staff on the project team.

- **Date(s):** May 2023 – March 2024
- **Engagement Method:** shared Outlook mailbox (OurVancouver2045@cityofvancouver.us)
- **Purpose:** Provide a way for community members to contact the project team, ask questions, and share their thoughts. Newsletter emails were sent from this email address.
- **Participation:** Emails were received that contained direct project input/inquiries. Additional emails were for answering logistical/technical questions, coordinating events, connecting inquirers with correct City staff when un-related to Our Vancouver, or were considered spam.
- **Outreach Methods Used:** Email address was listed on tabling materials, social media posts, newsletter emails, presentations, and Be Heard.
- **Topics Covered:** Parks, transportation, and housing

Informational Sessions

In addition to the previously stated engagement events, City staff were invited to present project information with local groups to spread awareness and provide opportunities for involvement and collaboration. Attendees were encouraged to share about the project in their networks, visit Be Heard and share their feedback through other engagement opportunities like the Pin Map and Community Survey. The project team presented at meetings with education partners like environmental science teachers at ESD 112, community-based non-profits, and neighborhood associations and attended City Manager Quarterly meetings and Council community forums.

Policy and Program Recommendations from Engagement

This section provides an overview of community feedback that emerged during Phase 1 of community engagement for the Our Vancouver Comprehensive Plan. Common "Key" themes emerged across feedback gathered at engagement events, which are organized based on the Comprehensive Plan chapters.

Each Key Theme includes:

- **Key topic overlaps:** The chapter topics that community members commonly referenced in relation to each other are listed here to illustrate the intersectionality of different community values and highlight the need to consider how they impact each other.
- **Themes from the Chapter Vision Statements**: these outline the overall vision and intent of each Comprehensive Plan chapter and what it will aim to achieve. The vision statements are consistent with the Goals Framework previously endorsed by the City Council. For more about the Chapter Vision Statement themes, see final chapter vision statements document.
- **Recommendations for policy and program implementation:** Recommendations emerged from common themes in community input and feedback during engagement events.
    - For each recommendation, we identify the engagement event(s) where community input related to that topic was gathered that informed the recommendations.
- These recommendations will be incorporated into the Comprehensive Plan development when possible and influence decision-making and values to use while creating further policy. If recommendations are outside of the scope of the Comprehensive Plan, recommendations may be shared with other City teams and projects.
- The project team documents when and how feedback is incorporated into comprehensive plan development and decision-making in an Accountability Matrix, which will be routinely shared with communities.

Community Feel and Vision

KEY TOPIC OVERLAPS: LAND USE AND DEVELOPMENT, HOUSING, PARKS AND RECREATION, EQUITY AND INCLUSION

Chapter Vision Statement Themes

- Valued, included, and honored
- Different histories and lived experiences
- Strengthens bonds
- Individual and collective trauma and systemic injustice
- Uplift individuals and communities
- Truly belong

Policy and Program Recommendations from Engagement

Maintain existing attributes and aesthetics that exist in green spaces, local art, and community hubs across the City while improving other areas to match.

FEEDBACK FROM COMMUNITY SURVEY AND PIN MAP.

- Appreciation for existing features and character of Vancouver, like green spaces, events, concerts, food trucks, and local art.
- Concerns about graffiti and litter – there are some areas where aesthetic improvements are needed.

Create more community hubs and spaces outside of work and home around the City to foster community.

FEEDBACK FROM COMMUNITY SURVEY, SUMMER ENGAGEMENT, COMMUNITY PARTNER MEETINGS, AND PIN MAP.

- Appreciation for existing community hubs that create strong sense of community, including community centers, faith centers, schools, neighborhoods, parks, libraries, waterfront, and Vancouver Mall.
- Desire for more spaces and amenities outside of work and home to encourage community.
- Community partners noted that Esther Short is a "living room" for the community and asked how we can create more of those types of spaces throughout the City *(see Parks and Recreation)*.

Foster belonging through culturally inclusive design and aesthetics.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS.

- Welcome people from all backgrounds and cultures and make that visible in our community aesthetics and design through recognition of historical development.

Place equity at the forefront of all components of the Comprehensive Plan to uplift individuals and communities and make Vancouver a welcoming place for all.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS AND CHAPTER VISION STATEMENT.

- Need to foster belonging in the community through affordable and accessible housing *(see Housing)*.
- Concern about houselessness crisis *(see Housing)*.

Land Use and Development

KEY TOPIC OVERLAPS: TRANSPORTATION AND MOBILITY, COMMUNITY FEEL AND VISION, COMMUNITY HEALTH

Chapter Vision Statement Themes

- Sense of inclusion for people of all backgrounds
- Preventing displacement
- Community spaces
- Build and sustain community
- Harmony between the built and natural environment
- Choice and opportunity

Policy and Program Recommendations from Engagement

Develop land use policy with trauma informed practice and a goal of preventing displacement of current residents.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS.

- Incorporate trauma informed practice into built environment.

Focus land use policies on creating connected and accessible communities with access to essential services, grocery stores and retail areas, employment, childcare, community spaces, and recreation opportunities.

FEEDBACK FROM COMMUNITY SURVEY, PIN MAP AND COMMUNITY PARTNER MEETINGS.

- Importance of having employment centers, commercial centers, recreation opportunities, and public facilities within walking distance of home *(see Transportation and Mobility)*.
- Desire for balance between residential and commercial development to support walkable communities, i.e. the waterfront.
- Support for walkable neighborhoods with access to essential services, healthcare, and businesses *(see Community Health)*.
- It is especially important to have places of employment with housing available nearby and access to walkable childcare.
- Community partner neighborhood asset questionnaire results.

Take advantage of underutilized lots and parking areas as opportunities for development to increase neighborhood density.

FEEDBACK FROM PIN MAP AND COMMUNITY PARTNER MEETINGS.

- Opportunities for development in underutilized lots or underutilized parking areas.
- Support for building neighborhood density, while allowing for community spaces.

Maintain low-density residential zoning in many existing neighborhoods throughout the City based on community desire. Consider reducing existing parking minimums while ensuring that there is sufficient parking availability to accommodate increasing density.

FEEDBACK FROM COMMUNITY SURVEY.

- Concern about density increasing too much.
- Desire to maintain low-density residential zoning in existing neighborhoods.
- Concern about parking availability to accommodate increasing density.

Maintain character and qualities of historic neighborhoods like Main Street. New developments should have consistent design standards with existing parts of the City and foster harmony between the natural and built environment.

FEEDBACK FROM COMMUNITY SURVEY.

- Desire for consistent design standards for new developments *(see Community Feel and Vision)*.
- New development should consider historic developments and neighborhoods like Main Street.

Housing

KEY TOPIC OVERLAPS: LAND USE AND DEVELOPMENT, EQUITY AND INCLUSION

Chapter Vision Statement Themes

- Community pride
- Prioritize historically excluded community members
- Non-traditional design methods
- Middle and multigenerational housing
- Connected and accessible neighborhoods
- Access to jobs, education, essential services and open space

Policy and Program Recommendations from Engagement

Increase density and availability of housing, especially middle housing, to create a diverse housing market that meets the varied needs of our community across the lifespan, especially seniors and people with disabilities.

FEEDBACK FROM COMMUNITY SURVEY, COMMUNITY PARTNER MEETINGS, AND SUMMER ENGAGEMENT.

- Increased density of housing is necessary to meet future housing needs *(see Land Use and Development)*.
- Need for diverse housing options to meet current and future needs.
- Housing needs evolve across the lifespan - some residents may need larger homes to accommodate growing families, while older residents may be looking to downsize or move to senior living facilities.
- Increase availability and affordability of housing for disabled population on fixed incomes, with specific housing needs.
- Increased housing options are needed to meet needs of seniors and people with disabilities.

Incorporate a variety of housing types to increase availability of middle housing, including ADUs, mixed use housing, duplex / triplex / quadplex housing, cottage clusters, and more.

FEEDBACK FROM COMMUNITY SURVEY, COMMUNITY PARTNER MEETINGS, AND HOUSING FORUM.

- Community Survey: single family homes, mixed use buildings, and duplexes/triplexes/quadplexes and townhomes were the most popular housing types.
- Mixed use buildings were very popular among business owners and renters.
- Desire for mixed use, cottage clusters, ADUs, and tiny home developments to meet a range of needs and income levels.

Plan for culturally specific housing needs, including multigenerational housing.

Feedback from Community Partner Meetings.

- Incorporate culturally specific housing needs, i.e. multigenerational housing.
- Housing can help foster independence, develop community support networks, and increase community connectedness and interdependence.

Plan for a future where housing options are and remain affordable throughout Vancouver, despite cost of living and inflation increases, including for people on fixed incomes or people with disabilities.

Feedback from Community Survey, Community Partner Meetings, and Summer Engagement.

- Impacts of inflation can impact housing access, especially for single individuals.
- Need for affordable housing for people with disabilities and on fixed incomes.
- Concern about not having attainable or affordable housing ownership options, the rising cost of living, and having to leave Vancouver to find affordable housing in the future due to rising home prices.
- Consider what affordable means in a real-world scenario for a real family. A lot of people are paying up to 50% of their income for housing.

Develop policies to support affordable housing, including rent control, restrictions on short-term rentals, restrictions on private equity and corporate home ownership, inclusionary zoning, and development standards for residential use.

Feedback from Community Survey and Housing Forum.

- Concern about cost of housing.
- Desire for policies to support affordable and attainable housing options, like rent control, restrictions for short-term rentals, restrictions on private equity

and corporate home ownership, inclusionary zoning, development standards for residential use, and social and supportive services *(see Land Use and Development)*.
- There should be more funding for renting and owning, including rental assistance and downpayment assistance.

Consider policies to include air conditioning and heat to address safety concerns in a changing climate.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS.
- Need for access to air conditioning and heat *(See Climate & Sustainability)*.

Reduce barriers to housing through social and supportive services; rental assistance and downpayment assistance; and eliminating credit checks, criminal records checks, and rental history requirements.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS AND HOUSING FORUM.
- Concern about barriers to housing access (renting and owning).
- Credit checks, affordability, rental history, criminal records/screening and access to funding support for renting and buying are policies that can create barriers to access.
- Name changes (esp. for women and LGBTQ+) are barriers to housing access.
- Undocumented residents pay extra for downpayments and pay taxes but do not get benefits of social security.

Increase housing and supportive services to reduce and prevent houselessness, including transitional housing services, supportive services for people on the verge of houselessness, and increased housing options.

FEEDBACK FROM COMMUNITY SURVEY AND SUMMER ENGAGEMENT.
- Concern about prevalence of houselessness in Vancouver.
    - Summer engagement: Some community members were personally experiencing displacement or living out of their cars.
    - Community Survey: A few respondents commented on houselessness in response to a question about top issues impacting neighborhood health and wellbeing.
- Keep streets safe by addressing houselessness with built infrastructure, which will allow for children to travel more independently of adults.

- Support for transitional housing services. Lead with a housing-first model and implement transitional housing services.
- Need increased housing options for houseless individuals and supportive services to prevent houselessness and help people who are on the verge of houselessness keep their housing.
- Some opposition to spending public tax dollars on supportive services for houseless individuals in the Community Survey.

Equity and Inclusion

KEY TOPIC OVERLAPS: COMMUNITY FEEL AND VISION, INFRASTRUCTURE, PUBLIC FACILITIES AND SERVICES, LAND USE AND DEVELOPMENT

Chapter Vision Statement Themes

- Intersectional Identities
- Past and ongoing exclusion
- Exclusionary practices, raciest and oppressive systems
- Reparative actions
- Increasing pathways to access and participation

Policy and Program Recommendations from Engagement

Evaluate all aspects of the Comprehensive Planning process in the context of historical injustice and systemic racism, exclusionary practices, and intersectionality to ensure that the new plan does not perpetuate harm.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS, SUMMER ENGAGEMENT AND CHAPTER VISION STATEMENT.

- Recognize historical injustice and systemic racism and make reparative actions.
- Be bold, clear, and transparent about these topics.
- Continue to maintain Vancouver's equitable and inclusive community environment and high quality of life *(see Community Feel and Vision)*.

Be mindful of the needs of people with disabilities throughout the planning process and set design standards that are compatible with and/or exceed ADA accessibility requirements.

FEEDBACK FROM COMMUNITY SURVEY AND SUMMER ENGAGEMENT.

- Importance of Designing with ADA accessibility in mind *(see Infrastructure, Public Facilities and Services)*.
- Consider disabilities in the planning process.

Be deliberate in conducting outreach to and including people of diverse backgrounds in the Comprehensive Planning process.

FEEDBACK FROM COMMUNITY SURVEY.

- Center diversity and inclusion in community events and planning.

- Desire for culturally specific resources in neighborhoods, like grocery stores and events *(see Land Use and Development)*.

Increase supportive services for vulnerable populations in our community, especially youth, elders, and people with disabilities.

FEEDBACK FROM COMMUNITY SURVEY, SUMMER ENGAGEMENT AND PIN MAP.

- Need for more services for youth and people with disabilities.
- Need for more supportive services for elders and older adults, including senior centers and senior living communities.
- Community Survey: Resources should be available to support the expected increase in senior residents over the next 20 years.

Climate, Environment, Community Health, Sustainability, and Resiliency

KEY TOPIC OVERLAPS: PARKS, RECREATION AND OPEN SPACE, LAND USE AND DEVELOPMENT, PUBLIC SERVICES, EQUITY AND INCLUSION, TRANSPORTATION AND MOBILITY

Chapter Vision Statement Themes

- Built and natural environment
- Climate adaptation and mitigation
- Heat islands
- Sustainable infrastructure and green spaces

Policy and Program Recommendations from Engagement

Consider holistic strategies to reduce air, water, and noise pollution across the City.

FEEDBACK FROM COMMUNITY SURVEY.

- Concern about air, water, and noise pollution.
- Community Survey: air, water, and noise pollution was ranked as the top issue in response to a question about issues impacting neighborhood health and well-being.

Incorporate policies to increase tree canopy and urban shade, landscaping, community gardens, habitat protection, and access to green spaces.

FEEDBACK FROM COMMUNITY SURVEY AND PIN MAP.

- Desire to preserve open space, minimize habitat destruction, and increase urban shade and landscaping.
- Develop more community gardens and plant native, pollinator plants in public spaces *(see Parks and Open Space)*.
- Support for increasing the tree canopy.
- Community Survey: Access to green spaces was ranked third priority in response to a question about issues impacting neighborhood health and well-being *(see Parks and Open Space)*.
- Community Survey: Habitat destruction was ranked fifth priority in response to a question about issues impacting neighborhood health and well-being.

- Pin Map: 6 pins were placed for increased landscaping, including shade and native plants, primarily in Central Vancouver. 2 pins were placed along the Waterfront to indicate need for increased shade.

Prioritize climate-friendly practices in land use, like closing streets to cars, technological innovations like using porous concrete, and conservation of forest and agricultural land.

Feedback from Community Survey and Summer Engagement.

- Implement climate-friendly practices and priorities.
- Consider e-bike subsidies, closing streets to cars, and using porous concrete *(see Transportation and Mobility)*.
- Consider long-term sustainability in land use practices *(see Land Use and Development)*.
- Balance development with forest and agricultural land conservation.

Be deliberate in planning for climate change and resiliency, including considering urban heat islands, guarded power lines, shelter spaces, and neighborhood meeting points.

Feedback from Community Partner Meetings and Community Survey.

- Consider resiliency through tree canopy, guarded powerlines, shelter spaces, and meeting points.
- Concern about access to air conditioning and heat.
- Community Survey: Extreme weather events was ranked toward the bottom of priorities in response to a question about issues impacting neighborhood health and well-being.

Prioritize access to healthcare and social services and food and fresh produce in connected and accessible communities.

Feedback From Community Survey.

- Need for increased access to healthcare and social services *(see Public Services, Land Use and Development)*.
    - Community Survey: Access to healthcare and social services was ranked as second priority in response to the question about issues impacting neighborhood health and well-being. This was the most important priority for non-white respondents with incomes below $50,000 or above $150,000.

- Need for increased access to food and fresh produce.
    - Community Survey: Food insecurity was among the top four priorities in response to the question about issues impacting neighborhood health and well-being for respondents with incomes below $90,000, and non-white respondents between the ages of 25-44 or with incomes above $150,000.

Reduce barriers to accessing social services and recreation.

FEEDBACK FROM COMMUNITY SURVEY.

- Need to improve accessibility of services and information for people of all abilities *(see Public Services, Parks and Recreation, Equity and Inclusion)*.
- Community Survey: Accessibility of services, recreation, and information for people of all abilities was ranked fourth priority in response to the question about issues impacting neighborhood health and well-being.

Economic Opportunity

KEY TOPIC OVERLAPS: HOUSING, LAND USE AND DEVELOPMENT

Chapter Vision Statement Themes

- Equitable, community-centered economic development
- Housing and childcare as key economic development strategies
- Breaking down barriers to entry
- Uplifting existing residents and workforce
- Upward mobility

Policy and Program Recommendations from Engagement

Prioritize providing neighborhood access to coffee shops, restaurants, and grocery stores.

FEEDBACK FROM COMMUNITY SURVEY AND COMMUNITY PARTNERS MEETINGS.

- Restaurants, coffee shops and grocery stores were most popular businesses to add to neighborhoods in the community survey.
- Coffee shops are particularly popular among respondents 24 years old and younger.
- Grocery stores were slightly more preferred among renters.
- Community Partners indicated local access to these types of businesses is a priority and added arts facilities and retail.

Consider a variety of uses and use cases for small business when developing land use and zoning codes – enable opportunities for flexible use space, food carts, and incubator spaces.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS.

- City should seek to provide incubator spaces, food carts, etc.
- Optimize underutilized spaces for business opportunities.
- Consider affordability – areas along the waterfront are not affordable or accessible to smaller businesses because of high rents.
- Displacement can have significant impacts for small businesses.

Encourage programs to provide workforce development opportunities and technical assistance for small and emerging businesses, especially for equity priority communities.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS, THE COMMUNITY SURVEY AND SUMMER ENGAGEMENT.

- Supporting small business was a common theme in all engagements.
- Community Partners suggested providing technical assistance for small businesses including resources around required licensing.

Prioritize youth education and developing workforce pipeline. Require large corporations and developers to support local workforce development priorities.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS AND COMMUNITY SURVEY.

- Education disparity impacts access to economic opportunities.
- Community Partners recommended workshops focused on youth education.
- Large corporations attracting residents to the area should contribute to affordable housing and other strategies to support local workforce.

Parks, Recreation, Open Space, and Community Well-Being

KEY TOPIC OVERLAPS: COMMUNITY FEEL AND VISION, CLIMATE, ENVIRONMENT, EQUITY AND INCLUSION, PUBLIC FACILITIES

Chapter Vision Statement Themes

- Increased access to vibrant green spaces
- Adapting to climate change
- Embracing native plants and species
- Diverse recreational opportunities
- Interconnected community

Policy and Program Recommendations from Engagement

Maintain and improve access to existing parks, especially for non-white and low-income residents in Vancouver to increase feelings of belonging.

FEEDBACK FROM COMMUNITY SURVEY, SUMMER ENGAGEMENT, AND PIN MAP.

- Access to parks and open space was reflected as top priority. People frequently commented on trails, positive aspects of recreational spaces, and community resources like libraries, parks, and community centers that respondents enjoy.
- In the Community Survey, most respondents indicated that it is somewhat or very easy to access parks and recreational facilities in their neighborhoods, although approximately 25% of non-white respondents indicated that it was somewhat or very difficult.
- Parks and public spaces encourage feelings of belonging *(see Community Feel and Vision)*.
    - City parks, community centers, libraries, farmers markets, and the waterfront are common places to build community.
    - Connection to the natural environment also fostered a sense of belonging.

Develop new green and community spaces with a variety of uses and prioritize culturally specific needs. Ensure that these resources are free or have low-cost to reduce barriers to entry focused on youth.

FEEDBACK FROM COMMUNITY SURVEY, SUMMER ENGAGEMENT, AND PIN MAP.

- Desire for more parks, green spaces, paths, trails, and other community resources *(see Climate and Environment)*.
    - Community Members indicated parks and green spaces were a top priority, followed by community centers, preforming arts venues and other arts-focused spaces, and libraries.
    - Additional suggestions included indoor recreation spaces, community pool, playgrounds, skateparks and pump tracks, museums, community events, trails, dog parks, and street trees.
    - Community Partners emphasized the importance of culturally specific organizations, parks, libraries and community centers.
- Desire for increased availability and accessibility of spaces outside of work and home, especially for youth *(see Community Feel and Vision, Equity and Inclusion)*.
- Low-cost and free activities were particularly important to access and feelings of belonging *(see Community Feel and Vision, Equity and Inclusion)*.

Seek resources to maintain and improve existing amenities at existing parks and playgrounds around the City.

FEEDBACK FROM PIN MAP.

- Suggestions at playgrounds included making structures safer, using non-toxic materials, maintenance to remove litter, and inclusive design *(see Equity and Inclusion, Public Facilities)*.
- Suggestions at parks included increased parking and bathroom facilities, especially at Wintler and Marine Parks.

Transportation and Mobility

KEY TOPIC OVERLAPS: INFRASTRUCTURE, PARKS AND RECREATION, ANNEXATION

Chapter Vision Statement Themes

- Equitable and connected transportation options
- Prioritize reliability and frequency
- Multi-modal options
- Remove barriers to new modes
- Integrated transportation hubs
- Enhanced regional connectivity

Policy and Program Recommendations from Engagement

Increase transit options, including bus rapid transit, bus routes, and light rail to Portland, especially on the outskirts of the City and connecting to the Vancouver Urban Growth Area.

FEEDBACK FROM ALL ENGAGEMENT.

- Need for more and improved transit options, including increased bus routes and bus rapid transit, and a light rail line to Portland *(see Infrastructure)*.
    - Community Survey: Youth were more likely to select or comment on increased transit as priority.
- Privileged people take independence afforded by transportation for granted. If you rely solely on public transit for transportation, the lack of it is a barrier to access *(see Equity)*.
- Need increased transit especially on outskirts of the City, especially as it relates to housing displacement.
    - Pin map: 8 pins were placed in areas where more transit was needed, primarily in East Vancouver.
- Need for increased transit between Vancouver and unincorporated areas to the north, including Battle Ground *(see Annexation)*.

Increase and improve convenience of transit stops, including adding shelter.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS AND HOUSING FORUM.

- Need for greater accessibility and convenience of transit stops, including shelter.
- Importance of making sure that transit is and feels welcoming and safe to use.

Consider strategies to balance need for parking while reducing underutilized space currently dedicated to parking.

Feedback from Community Survey, Housing Forum, and Pin Map.

- Mixed feelings about availability of parking: some people would like to see less space used for parking, others are concerned about parking being removed.
    - Housing Forum: people expressed worry about parking being removed.
    - Pin Map: 10 pins were placed where there was too much underutilized space for parking.
- When thinking about development, we need to make sure that there is enough parking and facilities to handle new development *(see Infrastructure)*.

Reduce traffic congestion and incorporate strategies to manage speeding and improve safety on local streets.

Feedback from Pin Map and Community Survey.

- Concern about traffic safety and speeding *(see Law Enforcement)*.
    - Pin Map: 11 pins were placed in locations indicating traffic congestion, speeding, and concerns about safety and 5 pins were placed in areas with concerns about safety and noise related to industrial traffic. 4 pins were placed in areas where participants suggested traffic calming measures.
- Need for strategies to address traffic congestion and commuting concerns.
- Need for clean and safe roads by addressing street maintenance and potholes, especially on-ramps on highways.

Improve pedestrian facilities across the City by adding sidewalks, ADA ramps, crosswalks, lighting, and connected walkways.

Feedback from Pin Map, Community Survey and Summer Engagement.

- Widespread support for multimodal transportation.
- Need for more pedestrian friendly development, like sidewalks, ADA crosswalks, and connected walkways.
    - Pin Map: 6 pins were added to identify locations for new pedestrian sidewalks and crosswalks.
- Need for pedestrian improvements to increase accessibility to parks *(see Parks and Recreation)*.

- Increase street lighting, especially along pedestrian facilities *(see Infrastructure)*.

Improve bike facilities, including separated bike lanes, and improve maintenance of existing facilities to prioritize cyclist safety.

FEEDBACK FROMPIN MAP, COMMUNITY SURVEY AND SUMMER ENGAGEMENT.

- Need for improved bike facilities, including separated bike lanes, and improved maintenance of existing bike facilities.
    - Community survey: Most responses were supportive of bike lanes, but a few responses were opposed to converting parking and roadway to bike lanes.
    - Pin Map: 9 pins were added to suggest new or improved bike lanes.
- Importance of fostering a sense of safety and promoting physical safety of cyclists.

Plan for, enable, and encourage opportunities for micromobility options like electric scooters/bikes and bike share.

FEEDBACK FROM PIN MAP.

- Improve access to micromobility options like electric scooters and bike share systems.

Infrastructure, Public Facilities and Services, and Utilities

KEY TOPIC OVERLAPS: TRANSPORTATION AND MOBILITY, ANNEXATION, COMMUNITY FEEL AND VISION, HOUSING, EQUITY AND INCLUSION, COMMUNITY HEALTH, COMMUNITY WELL-BEING

Chapter Vision Statement Themes

- Leverage existing investments
- Efficient and equitable growth
- Mitigate and adapt to climate change
- Equitable access to programs and resources
- Strategic Distribution
- Social Infrastructure

Policy and Program Recommendations from Engagement

Consider cultural differences and plan for a broad variety of use cases in infrastructure development.

FEEDBACK FROM COMMUNITY PARTNER MEETINGS.

- There is a lack of historical consideration of cultural differences in infrastructure development.

Pursue strategies to improve existing public utilities and provide new utilities while avoiding cost increases to users.

FEEDBACK FROM COMMUNITY SURVEY, SUMMER ENGAGEMENT AND COMMUNITY PARTNER MEETINGS.

- Concern about cost of public utilities, including water, sewer, garbage and electricity.
- Desire for improved stormwater management and drainage.
- The City should focus on improving existing infrastructure rather than expanding *(see Annexation)*.
- Suggestion to provide City-wide access to free internet.

Enforce existing traffic safety laws and codes to improve safety, reduce illegal parking, and maintain aesthetics.

FEEDBACK FROM COMMUNITY SURVEY AND SUMMER ENGAGEMENT.

- Need for more enforcement of traffic safety laws and speed limits *(see Transportation and Mobility)*.

    - Community Survey: Desire for increased law enforcement presence was particularly strong among respondents over age 65 or with an income of less than $50,000, though a few shared concerns about police corruption.
- Need for code enforcement to address illegal parking.
- Need for code enforcement to address litter and unmaintained building facades *(see Community Feel and Vision)*.
- Community Survey: A few respondents commented on crime and public safety concerns in response to a question about top issues impacting neighborhood health and wellbeing.

Ensure that all parts of the City are reachable by fire trucks and emergency services.

FEEDBACK FROM SUMMER ENGAGEMENT.

- Concern about road infrastructure being inadequate to enable fire trucks and emergency services to quickly reach parts of the City where roads are narrow (See Transportation and Mobility).

Increase support for and availability of emergency and health services.

FEEDBACK FROM COMMUNITY SURVEY AND SUMMER ENGAGEMENT.

- Need for more support for emergency and health services, including affordable mental health services, disaster preparedness and resilience hubs, resources for houseless communities, drug prevention and rehabilitation programs, family planning programs, and other social justice programs *(see Housing, Equity and Inclusion, Community Health, Community Well-Being)*.
    - Community Survey: Access to healthcare and social services was particularly important to non-white respondents.
- Services for houseless community members, youth, people with disabilities, LGBTQIA+ individuals, and people living in poverty were also identified as priorities *(see Housing, Equity and Inclusion)*.

Annexation

KEY TOPIC OVERLAPS: INFRASTRUCTURE

Chapter Vision Statement Themes

- Sustainable, balanced growth
- Urban levels of service
- Logical boundaries
- Sense of pride, place, character, and identity

Policy and Program Recommendations from Engagement

Plan to conduct additional community engagement when considering annexing new areas within the Urban Growth Area.

FEEDBACK FROM COMMUNITY SURVEY AND SUMMER ENGAGEMENT.

- Support for prioritizing annexation of areas within Vancouver's Urban Growth Area.
- Discussion and questions about timeline for annexing Hazel Dell neighborhood.
- A few people commented that the City should not annex unincorporated areas.

Seek to maintain and improve existing infrastructure while considering expanding service.

FEEDBACK FROM SUMMER ENGAGEMENT.

- One person suggested focusing on improving existing infrastructure rather than expanding *(see Infrastructure)*.

Outreach and Engagement Method Lessons Learned

Prioritize youth, black and Hispanic community members in future outreach and engagement by continuing to partner with local community-based organizations and utilizing community partner connections and networks.

Based on demographic information collected, the project team engaged with youth, black and Hispanic populations less than other populations in Vancouver.

Track engagement input from in-person events with more consistent methods for accountability of implementation by requiring reporting and systems in place be utilized.

Due to the variety of engagement methods, audiences and formats, input was not collected as consistently as is possible.

When hosting events, make presentation materials more accessible to community members with less technical jargon, more communal and interactive environments, translated materials and interpretation available.

Based on field notes, the housing forum content could have been less technical, interpreters were available in multiple languages, but materials were not translated into all languages, and the environment felt more formal than many community members feel comfortable with.

Next Steps

- Input from phase 1 engagement will continue to be used as the project progresses. Community members will be able to provide feedback on reflections during small group sessions.
- In phase 2 engagement, the project team will be conducting City-wide mapping activities that community members can select where to place various housing types to utilize their input in zoning codes within the comprehensive plan.

PHASE 2: COMMUNITY MAPPING ACTIVITIES ENGAGEMENT AND OUTREACH SUMMARY

June 2024

Overview

The **OUR VANCOUVER** team hosted a series of four community mapping activities over two weeks in April to help create a plan for future growth in Vancouver. While all four events were open city-wide, one event targeted engagement with the Vancouver neighborhood associations through a partnership with the Vancouver Neighborhood Alliance, and one event focused on engaging with youth, ages 13 to 25. The events featured a brief presentation from the project team to give an overview of **OUR VANCOUVER**, review key legislative updates influencing the comprehensive plan, and to explain the purpose of the mapping exercise.

After the presentation, project staff facilitated small group conversations around three maps showing focus areas in West, Central, and East Vancouver. Participants provided input on planning for housing and job growth over the next 20 years by identifying areas on the map where they think types of residential and employment development should occur. To do this, participants mapped six "place types" which were: low-scale neighborhood, medium-scale neighborhood, mixed-use neighborhood, regional activity center, employment, and institutional/campus. Each place type had an associated housing unit count estimating the number of new units that would be added, and also included information about the types of jobs that could locate in each. Place type descriptions were reviewed in the presentation and on posterboards at each table. Informational sheets on the table provided detailed information about place types, including the types of housing, jobs, and businesses that would be allowed. The objective of the activity was for participants to use a combination of the different place types to allocate a minimum number of units per focus area in accordance with Vancouver's anticipated 20-year population growth, which is a core requirement of Comprehensive Planning under the Washington State Growth Management Act.

The mapping activity was co-created with a group of community leaders, the Our Vancouver Community Partners, the Planning Commission, City Council, and technical staff. Early

versions of the activity were run with each of these groups. Feedback from those sessions was used to refine the instructions, place types, base maps, and focus areas to ensure that the activity was easy to understand and would provide meaningful input for the project team to use when developing land use possibilities.

Analysis

Project staff recorded the location and number of areas that participants placed various place types on the map. Physical maps created during the workshops were scanned and digitized and data was used to identify commonalities among how respondents allocated housing growth and jobs across the city.

This document summarizes qualitative feedback captured during the workshops, by project staff as they facilitated the workshops, in feedback forms that participants filled out at the end of the meeting, and from sticky notes participants left on the maps. General themes that emerged in the qualitative data are summarized below and categorized based on how themes align with chapters of the comprehensive plan. Throughout this summary, we use the terms "few," "some," "several," or "many" to provide an indicator of how frequently key themes and topics were discussed.

- *Few* = 2 or 3 comments that emerged from individual or group discussions.
- *Some* or *several* = more than 3 comments, but less than a third of the comments observed.
- *Many* = at least a third of the comments from individual or group discussions.

Themes are presented with general comments first. Comments related to specific areas or land use strategies are labeled as spatial considerations and will be incorporated directly into the development of the land use possibilities maps that will be analyzed as part of the project's environmental review process. Comments pertaining to policy and code considerations are also identified and will be taken into account when developing comprehensive plan zoning code and policies. More information about how the results of this mapping activity will be used is included in the next steps section on page 7.

Outreach Activities

OUR VANCOUVER team conducted outreach to increase awareness and encourage attendance at the events. Information about the events was shared on the project website, City social media channels, and highlighted in the project e-newsletter. The City also reached out to Community Partners and Vancouver neighborhood associations to inform residents of the events. There was a special focus on reaching youth in this process, especially helping to encourage youth attendance at the youth-focused mapping activity.

To meet community members where they are, the **OUR VANCOUVER** team visited approximately 30 local businesses, non-profits, and other organizations to share information about the events and drop-off event flyers in multiple languages. Several of these organizations indicated a preference for receiving materials in a specific language to share with clients.

In addition to the in-person activities, a virtual version of the mapping activity was available on the project website to reach community members that were not able to attend in-person. Participants were asked to select either west, central, or east Vancouver and assign place types to different subareas within the larger area. The count of responses received by area was:

- West: 14
- Central: 8
- East: 6

The results of the online activity were analyzed along with results of the in-person activities to inform land use alternatives. No qualitative feedback was captured in the virtual version of the mapping activity.

Demographics

In total, 68 community members participated in the four in-person community workshops. Participants were asked to provide optional demographic information as a part of the feedback form; 47 participants shared demographic information (69% of participants). Demographic information was not captured from the youth event.

While participants at the community mapping activities represent a small sample size of Vancouver's population, the race and ethnicity demographics of participants were similar to the overall population. The largest age group represented were individuals 65 or over (16%), while approximately 11% of participants were 24 or younger. Individuals over the age of 65 were represented proportionately compared to the population of Vancouver (17%)[1] but adults and youth were underrepresented. Approximately 56% of participants identified as

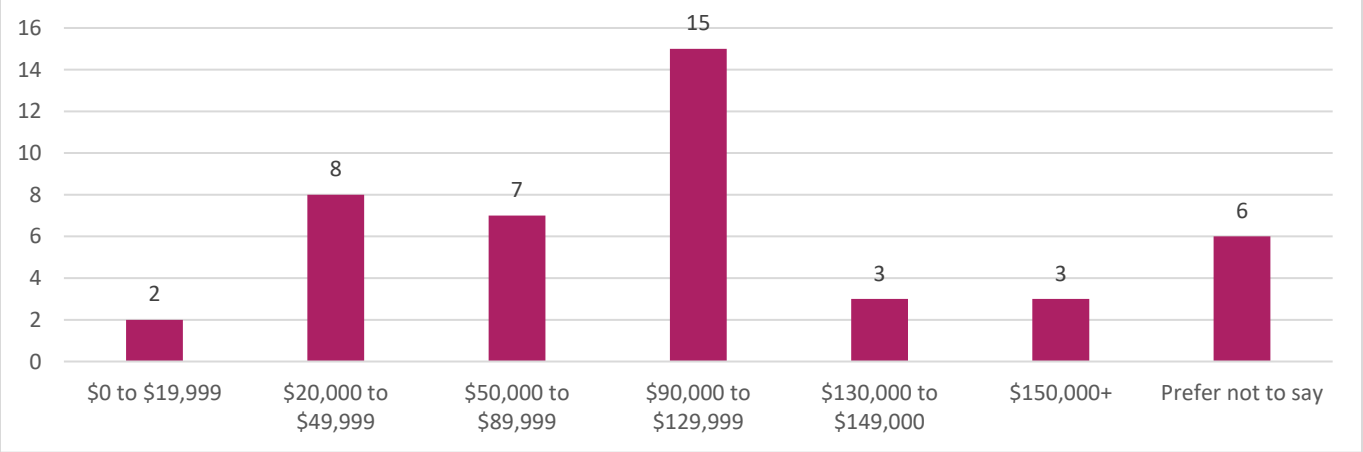
[1] US Census Bureau Community Survey, 2022 1-year estimates

female, 42% identified as male, and 2% identified as non-binary. Almost 13% of participants indicated that they have a disability compared to 14.7% in the general population.[1]

The largest race or ethnicity group represented at the four activities was white or European American (approximately 45%). About 8% of participants were Hispanic or Latino/a/e, 6% were Black or African American, 3% were American Indian or Alaska Native, 3% were Asian or Asian American, and 3% were two or more races. Approximately one third of participants indicated that they speak a language other than English, including Spanish, American Sign Language, Vietnamese, Mandarin, French, and German.

Participants at the community mapping events made up a larger portion of homeowners than the overall population in Vancouver; nearly 60% of participants own their home compared to 52% of Vancouver residents. About 20% of participants rent their homes, and 20% live with someone else but don't pay rent (primarily youth participants). Many participants reported that they have an annual household income of more than $90,000, which is higher than the median income of Vancouver residents ($63,617) (see Figure 1).

Figure 1. What is your annual household income?



What We Heard

Community Feel and Vision

While many participants shared feedback about the types of development they would like to see, a few community members focused on the existing community feel and vision, expressed some concern about the amount of growth Vancouver will see over 20 years, and commented that they want to maintain the community feel and vision by preserving existing buildings and neighborhoods.

Housing

Housing Affordability

- Many people had concerns about housing affordability city-wide.
- Several people had concerns specifically about senior housing options being limited and unaffordable.
- Some groups had conversations about different ways to increase affordable housing options.

Spatial considerations:

- A group discussed having space for mobile home parks in East Vancouver.
- Another group suggested new multifamily housing in the existing Winco parking lot.
- One group suggested a housing development near the VA to help connect people to essential services.

Accessory Dwelling Units

- Some participants were hopeful that the new state housing bills would encourage the development of ADUs and middle housing options to increase Vancouver's housing supply.
- A few groups were skeptical that the City can realistically plan for more housing, commenting that development should be driven by market conditions.

Policy and Code Considerations:

- A few people observed that the northern neighborhoods in West Vancouver have a lot of old garages, and they commented that having pre-approved Accessory Dwelling Units (ADU) conversions would help overcome permitting barriers for small-scale developers.

Transportation and Mobility

- A few people suggested developing more bike facilities in the area and designating a greenway for bike access.
- City-wide, participants expressed a need to improve transit options and prioritize development along existing transit lines.

Spatial Considerations:

- Several participants made suggestions for pedestrian improvements in East Vancouver, commenting that there are not enough walkable sections currently and there should specifically be improvements connected to the Mill Plain corridor.
- One group suggested developing a greenway off Burnt Bridge Creek Trail to improve bike connections to downtown. A community member commented that increasing density along this trail would help to establish the greenway and would ideally increase transit options.

- Some participants also commented that more bus routes are needed throughout East Vancouver.

Infrastructure, Public Facilities and Services, and Utilities

There is significant overlap between comments about Infrastructure and comments about Transportation.

- A few participants had concerns about the existing infrastructure in East Vancouver supporting development, saying that sewer system needs to be improved.
- Most people did not have specific concerns about infrastructure, public facilities, and utilities, but some people did express concern about having adequate infrastructure in 20 years to support a growing population.

Land Use and Development

- The majority of discussions centered around land use and development.
- Several discussions indicated a need for Vancouver to have more mixed-use neighborhoods.
- Many people generally commented that they would like to see an emphasis on higher density developments that integrate green spaces, public services, and employment opportunities to create walkable neighborhoods with complementary uses.

Spatial Considerations:

- Specific areas that participants discussed as needing to have more mixed-use development included north of Mill Plain at 136th Street, north side of the Section 30 sub-area, infill lots at Broadway and McLoughlin, underused parking lots city-wide, and adjacent to Columbia Tech Center and other existing employment centers.
- Several community members referenced Fourth Plain Commons as an example of the type of mixed-use developments they would like to see in their neighborhoods.
- Some community members felt that it is important to consider the compatibility of adjacent land uses, commenting that low-density areas should not be next to high-density areas.
- A few people had concerns about densification through upward growth, commenting that taller buildings should only be allowed downtown.
- In general, community members were supportive of locating higher-density developments along major roads and transit lines. A few groups commented that employment centers should be located near transit and should have denser development or mixed-use development around the area to support the economic activity.

- A few people suggested designating land for employment near the railroad tracks in West Vancouver to help mitigate noise impacts to nearby residents.
- Several people commented that more housing should be located next to parks and schools.

Parks, Recreation, Open Space, and Community Well-Being

Participants had the option to use stickers to indicate on the map where they would like to see more parks and community resources throughout the city, which was utilized on almost all the maps.

Spatial Considerations:
Several people commented that new community centers should be developed along transit lines.

- A few groups noted that there is a need for a library in East Vancouver.
- A few people said that the areas in East Vancouver they identified for new community resource developments should include daycares, community centers, and senior centers, but commented that new schools are not needed in East Vancouver.
- Some community members discussed the potential to increase community resources around existing institutions, including medical centers, senior centers, and Clark College, to provide essential services to people using those centers.

Policy and Code Considerations:

- Many community members would like preservation of existing parks and open spaces to be a priority for the future.
- Several people commented that they would like to see more parks and an increase in the tree canopy city-wide.
- A few people felt that, as the city densifies, more parks will be needed to serve the growing population and the City should work to improve and maintain existing parks.

Equity and Inclusion

- Some groups considered equity and inclusion when planning for new residential growth.
- Some community members commented that they have concerns about finding a balance between new development to meet residential needs and the displacement of existing residents.

Spatial Considerations:

- One group commented that they would like to see low density residential development in West Vancouver around the Washington State School for the Deaf and Washington State School for the Blind to reduce traffic and create a safer pedestrian environment.

Climate, Environment, Community Health, Sustainability, and Resiliency

- Some groups discussed the impacts of different types of development on the environment, commenting that mixed-use developments and creating more walkable neighborhoods will help the city meet its climate goals.
- Some community members identified areas where they saw a need for essential facilities or services to support the overall community health.

Spatial Considerations:

- A few people commented that there need to be more medical or hospital facilities around Vancouver Mall.
- A few people expressed concern about not having adequate access to grocery stores in the future, particularly in East Vancouver and downtown.

Policy and Code Considerations:

- One group said that they would like to see more community gardens and options to access local food.

Economic Opportunity

While most conversations were focused on locating residential development, some participants also discussed the implications for job growth and economic development.

Spatial Considerations:

- When discussing the Central Vancouver focus areas, participants frequently talked about the redevelopment potential around the Vancouver Mall and associated parking lots.
- A few people commented that they see a potential to redevelop the areas around NE 40th Street and Andresen Road to a more active use to increase economic activity.
- A group suggested developing a large new employment center in Section 30, although a few people commented that they were concerned about the traffic impacts of development at this location.
- Another group commented that new employment areas were needed north of Mill Plain, west of I-205.

- A few participants suggested allowing home-based businesses (e.g., bike shops) in East and Central Vancouver neighborhoods.

Event Reflections and Lessons Learned

Reflections from participants and staff will inform future engagement efforts as a part of the **OUR VANCOUVER** project.

Participant Reflections

Participants were encouraged to provide feedback at the end of the event to share their key takeaways from the activity. Most of the input received was directly related to the event. In general, most community members had positive feedback about the events, the venues they were held at, and appreciated that there was food available.

- Mapping activities helped participants feel more connected to and increased understanding of the comprehensive planning process.
    - The input received indicates that the activities were beneficial to the community because it familiarized them with **OUR VANCOUVER** and helped to make participants feel more connected to the planning process and to their community.
    - Most participants (80%) agreed or strongly agreed that their input will be used to inform Vancouver's Comprehensive Plan update, although two individuals indicated that they don't believe their input will be used.
    - Over 80% of participants said that they feel more connected to the community after the activity.
    - Nearly 87% of participants indicated that the mapping activity helped them understand the need for additional housing in Vancouver.
- Use facilitation strategies to welcome all voices to participate. Almost all participants responded that they felt welcome and comfortable at the event, although two participants felt neutral about the event. One group commented that one participant at their table seemed to take over the activity and they did not feel that they had an opportunity to provide valuable feedback.
- Continue sharing information about events on multiple platforms. Participants indicated that they heard about the event through various methods, including seeing a posting on the City's website, LinkedIn, through the BeHeard email list, social media, neighborhood association meetings, or through word-of-mouth from friends or family.
- Continue scheduling events at shared community locations. A few participants said that they were not aware of the event in advance but happened to be at the venue at the time.

Staff Reflections

Overall, staff felt that the mapping activities were successful in gathering the types of feedback that will be helpful in developing the land use possibilities. This section includes a set of reflections from staff about the activity and steps for future engagement.

- **Consider strategies to make activities accessible to folks with little to no background in land use planning.**
    - Mapping activity was successful at engaging community and conveying the scale of housing that will need to be added to the city. Community members found it helpful to get regular updates on how many housing units they had added to the map as they were working on it and were sometimes surprised at how easily they could reach their target housing unit count.
    - For community members who were unfamiliar with land use planning or housing types, it could take a while to get started on the activity because they had to spend more time to understand the place types.
    - Community members sometimes had difficulty distinguishing between the different place types and gravitated towards mixed use housing because it was familiar and had a high housing unit count.
- **Gather additional feedback to confirm priorities shared during the mapping activity**.
    - Feedback from the mapping activity provides initial insight into community priorities for how housing growth is allocated across the city. However, participants were not a representative group of community members; more feedback is needed from a broader swath of the City of Vancouver, and was the focus of more targeted engagement as the land use possibilities were developed.
    - Mapping activities provided only high-level information about community priorities. Future engagement efforts should verify these priorities with a broader audience.
    - The mapping activity provided some policy and code considerations, but more input is needed to shape policies in the Comprehensive Plan.
- **Increase engagement with equity priority communities through future engagement,** including people experiencing low incomes, youth under age 25, Hispanic/latino/a/x and Black communities, and communities with limited English proficiency who were underrepresented in this engagement effort.

Comprehensive Plan Policy and Program Implementation

Maps and qualitative feedback from the community mapping activities and online mapping activity provided a foundation to develop two land use possibilities to plan for growth through 2045.

- The land use possibilities will consider community input, development potential, housing and employment needs, and infrastructure and public facilities.
- The team will take the qualitative themes documented in this summary into account when creating the initial land use possibility maps, with a particular emphasis on the spatial considerations.

- Policy and Code Considerations will be taken into account when developing zoning code and policies associated with the Comprehensive Plan.
- More feedback will be gathered in subsequent phases of Comprehensive Plan development.
  - The next phase of community development will focus on soliciting input on the resulting two land use possibilities to further refine and analyze them as part of the project's environmental review process.
  - More feedback is also needed regarding the policy and code considerations community members would like to see across the city.

PHASE 2: DRAFT EIS COMMENT PERIOD ENGAGEMENT AND OUTREACH SUMMARY

September 2025

About the Draft EIS Comment Period

The Draft Environmental Impact Statement (Draft EIS) comment period extended from July 8 through September 8, 2025. Comments were collected via an online comment form available in in English, Chinese, Chuukese, Russian, Spanish, Ukrainian, and Vietnamese, as well as via phone, email, and mail.

Outreach

Outreach methods informed people about the Draft EIS findings and directed people to the online StoryMap with an overview of the Draft EIS findings, public events, and the comment form and other comment methods.

- 4,300+ Be Heard visits
- 3,300+ StoryMap views
- 22 total e-newsletter emails sent through three City email lists.
    - 15 Our Vancouver email list
    - 3 Vancouver Connects email list
    - 4 Office of Neighborhoods email list
- 27 social media posts across 4 platforms garnered 69,454 unique views.
- 100+ community groups, neighborhood associations, and boards/commissions directly emailed.
- 2 interactive public meetings
    - One in east Vancouver on a weekday evening
    - One in west Vancouver on a weekend midday
- 2 public virtual sessions
    - One during weekday lunch hour
    - One during weekday evening
- 8 group-specific discussions
- 2 City Council Workshops and 1 Planning Commission Workshop
- 1 self-guided exhibit in the City Hall lobby
- 4 tabling events
- 7 locations with outreach materials
- Nearly 600 promotional video views, also shown at 3 Movie in the Park events

- 2 print articles – The Columbian and the City's quarterly newsletter

Comments Received

The City received a total of 440 responses:

- 330 total responses from the online comment form, of which 24 responses were incomplete forms and did not contain a comment.
- 94 comments via email, 6 of which were also submitted via the online comment form or physical mail
- 15 comments via physical mail, 1 of which was also submitted via the online comment form or email
- 1 comment via voicemail

A total of 409 unique comments were received. Thirteen of these were received from agencies, businesses, or organizations.

Comment Review Process

The project team reviewed each comment and coded responses based on the chapters of the Draft EIS. The project team also added additional codes to capture comments related to the Draft EIS and Comprehensive Plan Update process. Comments were coded into multiple categories as overlap occurred.

- Alternatives
- Land and Shoreline Use
- Housing
- Aesthetics
- Historic and Cultural Preservation
- Transportation
- Noise
- Public Services and Utilities
- Earth
- Air Quality, Greenhouse Gases, and Climate
- Water
- Plants and Animals
- Other – Draft EIS Information, Data, and Approach
- Other – Engagement Process
- Other – Policies and Implementation
- Other – Annexation
- Other – Non-project

An additional sub-code was added for Alternatives to capture comments related to how alternatives impact a specific address, parcel, or neighborhood.

The summary section that follows may quantify comments received by the terms "few," "some," or "many." *Few* means less than 10 comments received; *Some* or *several* means between 10-39 comments received; and *Many* means 40 or more comments received on a particular topic.

Summary of Key Themes

This section provides a high-level summary of key themes and takeaways associated with each code, as well as how many comments pertained to each code. Refer to the Final EIS to view comments and responses in full.

Alternatives: Specific Address, Parcel, Or Neighborhood (226 comments)

Many comments included suggestions for modifications to a specific address, parcel, or neighborhood in one or both alternatives. Frequently mentioned areas included the Southcliff and Fisher's Landing neighborhoods and the downtown waterfront area.

Alternatives (114 comments)
Alternative 1 received some support from those who expressed concerns about rapid change, parking, traffic, neighborhood character, and dense development. Some comments indicated support for Alternative 2 as the best way to address housing, climate, and transportation needs. Some comments indicated support for both alternatives. Many comments indicated opposition to both alternatives.

Transportation (95 comments)
Many comments mentioned a desire for increased transit and connectivity and pedestrian and bike improvements. A few comments indicated concern about parking shortages amidst higher density, opposition to MAX light rail expansion, and frustration with downtown pay-to-park policies.

Land and Shoreline Use (82 comments)
Some comments shared support for density that creates walkable, mixed-use areas, locating jobs, services, and restaurants or grocery stores closer to neighborhoods. A few comments opposed mixing low- and medium- density zones and increasing industrial land uses; emphasized a desire for protecting farmland and open space; and highlighted conflicts between public zoning changes and private neighborhood covenants.

Plants and Animals (43 comments)
Comments called for better protection of tree canopy, wildlife corridors, and natural habitats and indicated concern regarding vegetation loss due to increased density.

Housing (39 comments)
Some comments indicated a desire for a variety of housing options, affordable housing, and homeownership opportunities. Some comments expressed opposition to high-density housing, citing traffic, parking, and neighborhood impacts to character and safety.

Historic and Cultural Preservation (31 comments)
Some comments mentioned a desire to preserve older brick buildings in Downtown, Fort Vancouver, and Pearson Airfield. There were also a few suggestions to recognize the unique history of Vancouver and partner with Indigenous nations to preserve and honor their history as part of the city's story and legacy.

Other – Draft EIS information, data, and approach (25 comments)
Some comments included concerns that the EIS analysis does not adequately evaluate combined impacts of rezoning and middle-ground options between the two Alternatives. A few questions about the analysis related to houselessness, tree canopy, Critical Areas Ordinance, and rezoning were also shared.

Aesthetics (24 comments)
Comments emphasized the importance of neighborhood character, cohesive, high-quality development, and concerns about graffiti, trash, and homelessness.

Public Services and Utilities (18 comments)
Comments mentioned concerns that existing public utilities, including schools, police, fire, emergency services, and parks, are strained and will not be able to keep up with demand as the city grows.

Other – Engagement Process (16 comments)
Comments included concerns that engagement did not fully reach all demographics (especially renters, non-English speakers, low-income residents, and those without internet access), information shared was difficult to understand, and input was being overlooked.

Air Quality, Greenhouse Gases, and Climate (14 comments)
Comments included support for growth along transit lines to reduce vehicle miles travelled, concern about air pollution near freeways and industrial zones, and calls to increase climate resiliency through tree canopy, open space preservation, and solar power.

Noise (14 comments)
Comments mentioned noise concerns associated with traffic, mixed-use rezoning, and industrial traffic, and expressed desire for noise barriers and protections.

Water (13 comments)
Comments mentioned concerns about stormwater runoff and pollution, increasing area of impervious surfaces, and groundwater availability in the future.

Other – Non Project (8 comments)
Comments were unrelated to the Comprehensive Plan update, including feedback related to the Interstate Bridge Replacement Program.

Other – Annexation (5 comments)
Comments included questions from residents outside City limits about how their areas will be managed, desire for increased communication regarding the annexation process, and concerns that annexation could result in increased congestion and taxes.

Other – Policies and Implementation (3 comments)
Comments included skepticism about how the rezoning process will be implemented, desire for building permits to include requirements for parking and natural space, and emphasized the need for regulation of small electric vehicle use in bike lanes.

Earth (1 comment)
Comment shared concern about whether geologic and environmental hazards related to increased housing and commercial density in Southcliff were adequately considered.

Demographics of Commenters

The online comment form contained additional optional demographic questions. The following subsections summarize demographics of individuals who chose to respond to these questions.

Zip Codes (300 responses)
Comments came from 24 zip codes, including the City of Vancouver and surrounding areas in the urban growth boundary, Camas, and Washougal.

Gender (275 responses)
The gender breakdown of respondents is as follows:

- Female, 45.5% (125)
- Male, 40.0% (110)
- Non-binary, 0.4% (1)
- Transgender, 0.7% (2)
- Prefer not to answer, 14.0% (39)
- Self-identified, 0.7% (2)

Age (255 responses)
More than half of responses came from respondents over the age of 55. The age breakdown of respondents is as follows:

- Under 18 years, 1.2% (3)
- 18 – 24 years, 2.0% (5)
- 25 – 34 years, 7.8% (20)
- 35 – 44 years, 16.9% (43)
- 45 – 54 years, 12.9% (33)
- 55 – 64 years, 18.4% (47)
- Over 65 years, 40.8% (104)

Race/Ethnicity (271 responses)

Most respondents (61.6%) identified as white or European American. The racial/ethnic breakdown of respondents is as follows:

- American Indian or Alaska Native, 0.7% (2)
- Asian or Asian American, 4.4% (12)
- Black or African American, 1.9% (5)
- Hispanic or Latino/a/e, 4.4% (12)
- Middle Eastern or North African, 0.4% (1)
- Native Hawaiian or Pacific Islander, 0% (0)
- White or European American 61.6% (167)
- Other, 2.2% (6)
- Prefer not to answer, 26.9% (73)

Language (223 responses)

48% of respondents said that they only speak English fluently, while 33.2% of respondents selected prefer not to respond. The most common language spoken by participants other than English was Spanish (8.1%). No responses were received in a language other than English.

Income (271 responses)

The income breakdown of respondents is as follows:

- Below $19,999, 0.7% (2)
- $20,000 – $49,999, 3.7% (10)
- $50,000 – $89,999, 11.1% (30)
- $90,000 – $129,999, 11.4% (31)
- $130,000 – $149,999, 4.1% (11)
- Above $150,000, 23.3% (63)
- Prefer not to answer, 45.8%, (124)

Disability (274 responses)

Approximately 9.1% of respondents have a disability.

Housing Situation (275 responses)

About three-quarters of survey participants (76.4%) own their house. Roughly 10.6% of respondents rent, and 2.2% live with someone but do not pay rent.

PHASE 2: LAND USE ALTERNATIVES ENGAGEMENT AND OUTREACH SUMMARY

November 2024 through June 2025

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Introduction

Purpose

The purpose of this document is to summarize engagement feedback and input from the community so that it can be incorporated into the **OUR VANCOUVER** Comprehensive Plan, specifically the land use alternative maps and the plan's goals, policies, and actions.

Approach to Outreach and Engagement

This phase focused on raising public awareness about the land use alternatives and preparing the public to provide comments during the draft environmental impact statement (EIS) comment period.

This phase's strategy focused on attending existing meetings and events and partnering with community-based organizations to organize events, instead of organizing City-led events.

During this phase, the project team proactively worked to hear from youth and Black and Hispanic community members, because these groups were under-represented in earlier comprehensive plan engagement (see Phase 1 and Phase 2 summaries).

Overview of Engagement and Outreach

This section provides an overview of the engagement and outreach methods used during this phase.

Engagement Methods

Group Presentations

Date(s): November 2024 – June 2025
Engagement Method: Board and commission meetings, neighborhood association meetings, community-based organization meetings/events
Purpose: Awareness, land use alternatives feedback
Participation: 18 events

Outreach Methods Used: Outreach was typically conducted by the partnering organization. Public meetings were posted to the Be Heard page. Promoted requests for presentations in e-newsletters.
Topics Covered: Comprehensive plan, land use alternatives, EIS process

Mini Mapping Activities

Date(s): 1/30/2025, 4/1/2025, 4/23/2025
Engagement Method: Mapping activities at NAYA Elders Luncheon
Purpose: Land use alternative feedback
Participation: 3 events
Outreach Methods Used: Outreach was conducted by the partnering organization.
Topics Covered: Comprehensive plan, land use alternatives

Tabling

Date(s): 1/14/2025, 2/5/2025, 2/6/2025, 3/6/2025
Engagement Method: Tabling at three Clark College student affinity luncheons and one community resource fair
Purpose: Awareness, land use alternatives feedback
Participation: 4 events
Outreach Methods Used: Outreach was conducted by the partnering organization.
Topics Covered: Comprehensive plan, land use alternatives

Visioning Collage and Zine Workshop

Date(s): Saturday, March 22, 2025
Engagement Method: Collage activity
Purpose: Awareness, community connection
Participation: 1 event
Outreach Methods Used: Social media, Be Heard, City and Kindred websites, Our Vancouver e-newsletter
Topics Covered: Chapter vision statements

Our Vancouver Email Inbox

Date(s): November 2024 – June 2025
Engagement Method: shared Outlook mailbox (OurVancouver2045@cityofvancouver.us)

Purpose: Provide a way for community members to contact the project team, ask questions, and share their thoughts. E-newsletters with project updates were also sent from this email address.
Participation: 23 emails were received that contained direct project input and/or inquiries.
Outreach Methods Used: Email address was listed on the StoryMap, hardcopy materials, social media posts, **OUR VANCOUVER** e-newsletters, presentations, and Be Heard.
Topics Covered: Comprehensive plan, land use alternatives, EIS process

Outreach Methods

- **Be Heard** – project webpage
  - 5,500+ views
- **StoryMap** - online interactive map of land use alternatives
  - 5000+ views
- **Our Vancouver e-newsletter:** 11/1/2024, 2/7/2025, 2/21/2025, 3/10/2025, 4/4/2025, 5/9/2025, 6/12/2025
  - From 493 to 628 recipients
- **Vancouver Connects** e-newsletter – November 2024, December 2024, 3/11/2025, 4/9/2025, 6/6/2025
- **Office of Neighborhoods** e-newsletter – 11/8/2024, 1/31/2025, 2/14/2025, 3/14/2025, 4/11/2025, and 6/27/2025
- **The Columbian** newspaper – 3/21/2025
- **Social Media** - Facebook, Instagram, LinkedIn, NextDoor
- **Flyers** at Coffee with the Mayor, Neighborhood Convenings, and Community Forums.

Summary of Feedback

This section provides an overview of community feedback that emerged during Phase 2C of community engagement for the **OUR VANCOUVER** Comprehensive Plan. Common "key themes" emerged across feedback gathered at engagement events, which are organized based on the comprehensive plan chapters. Additionally, some feedback was specific to the land use alternative maps or had a spatial component to the comment, so a sub-section has been added below to summarize this feedback.

The summary section that follows may quantify comments received by the terms "few," "some," or "many." *Few* means less than 10 comments received; *Some* or several means between 10–20 comments received; and *Many* means 20 or more comments received on a particular topic.

Community Experience

Accessibility of Places, Services, and Resources

Many people expressed that they wanted places, information, and basic needs to be accessible – physically, financially, socially/culturally, and bureaucratically.

Connection and Involvement

Many people had a strong desire for deeper community ties and engagement and wanted places and processes that would support this.

Safety, Comfort, and Stability

Many people highlighted the importance of safety, comfort, and stability. This was discussed in terms of personal physical safety, as well as emotional and mental safety allowing community members to feel happy and respected.

Belonging and Inclusion

Many people value and desire places, events, and organizations that reflect a specific aspect of their identity and that allow them to express themselves and connect with others who share that identity. Primarily, this was discussed in terms of culture and race/ethnicity.

Lifelong Learning

Many people described a desire for learning and training opportunities and placed value on places and programs that supported growing and sharing one's talents.

Mixed Feelings about Growth and Change

Some people acknowledged that growth and change will occur, while others expressed wanting to preserve things as they are. Many wanted to ensure that growth and change benefited existing and long-time residents. There were mixed views on the pace of change, as some were comfortable incremental

change while others expressed a need for more bold and immediate transformation.

Blend of Urban and Natural Amenities

A few people expressed appreciation for the community's mix of urban and natural amenities.

Vancouver's Push and Pull

What draws people **to** Vancouver?

- Family, school, jobs
- Retirement
- Balance of urban amenities with access to nature
- Amenities like the waterfront, events, or specific businesses

What draws people **from** Vancouver?

- Family, school, jobs
- Culturally-specific places
- Housing costs/availability
- Amenities like specific restaurants or more regional amenities.

Land Use and Development

Important places

Many people value access to the following uses and would like to see them maintained and increased:

- **Community centers**, including teen centers, religious facilities, and a desire for more grassroots gathering spaces.
- **Food-related uses**, including grocery stores, gardens and agriculture, the farmers market, and restaurants.
- **Medical and healthcare** uses, including hospitals, specialty clinics, and emergency rooms.

- **Parks and natural areas**, including the Columbia River, sports fields, and the Waterfront.
- **Educational facilities**, including trade and specialty schools, the Water Resource Education Center, and libraries.
- **Commercial spaces**, including Vancouver Mall, gyms, and amusement spaces--Some youth specifically wanted go-karts, a zoo/aquarium, viewpoints, a stadium, and a waterpark.
- **Identity-specific places** – Many people value and desire places that reflect a specific aspect of their identity and that allow them to express themselves and connect with others who share that identity, primarily, in terms of culture and race/ethnicity.

Places of concern and incompatibility

Some people had negative views of particular uses, including car dealerships, marijuana shops, large warehouses / industry, and "camping," and suggested measures such as transition areas, buffers, or prohibitions for these uses, particularly around schools, parks, and residential areas.

Support for allowing mixing

While many people seemed to support greater mixing of non-residential and residential uses if externalities (traffic, noise, air quality) are limited, a couple people were concerned that overregulating or requiring mixing could make development infeasible. A couple people didn't want commercial in their neighborhood.

Importance of single-story buildings/units

A few people inquired about building height and others noted that single-story buildings/units are important for residential and industrial uses.

Impact on existing development

A few people were concerned about how the plan update would impact existing buildings and the creation of non-conformities, wanting to ensure that existing development can remain and function.

Housing

Houselessness and Housing Security

Many people view houselessness as an issue in the community and want to help people be and stay safely housed. Some people specifically expressed support for shelters, safe stays, using underutilized spaces, building affordable housing, and other programs and resources as ways to improve housing security.

Housing Affordability

Many people recognized the rising cost of housing and felt that greater housing affordability is imperative. A few people asked what is meant by "affordable" and were skeptical about how adding more market-rate housing could improve affordability. However, others saw a connection and need for more housing broadly to improve affordability. One noted the need for subsidies to provide below-market rate housing.

Housing Density

Many people seemed comfortable with adding middle housing and some density. Some saw adding more housing as a way to support affordability, businesses, walkability, and transit. However, many people were concerned about the impact of higher density housing on existing neighborhood character, traffic, trees and nature, parks, and property values/taxes.

Housing Type and Design

While there was support for middle housing, people particularly value detached housing types (like single-family houses, ADUs, and cottage clusters) and ownership opportunities. Some people suggested design considerations like single-floor units for seniors, large units for families, outdoor space, and climate control features for climate resilience.

Housing Location

Many people wanted housing to have access to commercial services, medical centers, jobs, parks, transportation options, and other opportunities and resources. A few people brought up concerns about locating housing in unsafe areas or areas with high traffic, noise, or air pollution. A few people noted that infrastructure needs to be able to accommodate additional housing.

Residential Displacement

Some people were concerned about residential displacement, particularly for seniors, renters, and low-income residents. A couple of people expressed support for specific anti-displacement measures, like mobile home protections and rent caps.

Equity

People see and experience disparities and inequality in Vancouver

Many people spoke to the differences in access to a variety of things, including parks and trees, healthcare, jobs and economic opportunity, housing, transportation, community centers, internet, public spaces and processes, and places, organizations, and events that reflected their identity. There is a desire for equality in the community, allowing all to fully attain the themes outlined under Community Experience.

Current system disadvantages particular groups

Some people shared that different aspects of the social and built environment make it disproportionately difficult for particular groups of people to access to the things mentioned above and attain the themes under Community Experience. Primarily, the groups mentioned were in terms of race/ethnicity and culture, and were also mentioned in terms of immigration status, age, language, sexuality, gender, incarceration, marital status, housing tenure, and economic class/income level. *Of note, disability was not prominently mentioned, possibly due to limited engagement.

Greater focus on those who face the greatest barriers/have the greatest need

Some people directly expressed a desire and need for equity, including in planning and services. Many people expressed the need to support vulnerable populations, especially those with low incomes, those facing housing insecurity, youth and families, and seniors. Both the engagement feedback and process point to the need for diverse and tailored approaches (particularly culturally-aware and -specific approaches) in order to achieve equal access and attainment of desired community experience – not a one-size-fits-all approach.

Putting equity into practice

While some people expressed appreciation for the steps the City is currently taking to advance equity and inclusion, there was a desire for more immediate and visible progress. A couple of people suggested implementing equity goals in partnership with impacted communities and organizations for full effectiveness.

Climate, Environment, Community Health, Sustainability, and Resiliency

Enthusiasm and appreciation for natural amenities

Many people value sustainability and the environment, especially Vancouver's parks and trees. People shared that they valued these because of the benefits they provide in terms of physical and mental health, habitat area, transportation, and recreational opportunities. Outdoor spaces that people highlighted ranged from one's own yard/garden to the Columbia River.

Opportunities to support community health

Many people value health and saw ways that planning could support it, including in:

- Housing - housing stability, quality location and buildings
- Parks and recreation – exercise equipment and programming, spaces to be active, opportunities to connect with nature
- Transportation - bike lanes and walkability providing movement and connection, ability to access healthcare
- Land use and development – medical facilities, food access, gyms, green spaces
- Economic opportunity – income stability
- Implementation - culturally, linguistically, and physically accessible resources, partnering with community orgs

Clean air and quiet places are important, especially at home

Many people had concerns about noise and air pollution. A few people brought up compatibility concerns between land uses because of air and noise issues, like industrial uses and traffic/vehicles versus parks and housing. A couple people saw opportunities for mitigation, like having bike lanes and the need to mitigate noise from denser living.

Support emergency preparedness and better connect planning and climate

People did not usually bring up climate change or natural disasters on their own, but when discussed, many people were concerned and saw a need for increased awareness, communication, and preparedness. Public buildings and schools, hospitals and emergency services, grocery stores, religious facilities, Tribal offices, transit stops / centers, and trees were seen as critical infrastructure for resiliency. A couple people highlighted a need to consider Vancouver's rainy season when investing in infrastructure.

See Climate Vulnerability Assessment engagement summary for more detailed feedback on resiliency.

Economic Opportunity

Economic opportunity for all

Many people support jobs and economic growth and want it to benefit existing residents and local businesses, especially those who have historically lived in or contributed to Vancouver. Some people are concerned that job and housing growth may displace long-time residents and existing businesses. Some people stated the need to support equitable access to jobs for underrepresented groups and to support economically diverse neighborhoods.

Support for Diverse, Livable-Wage Employment Opportunities

Many people, especially youth and those working with youth, want more livable-wage and diverse job opportunities and workforce development opportunities. Places and programs mentioned included trade and specialty schools, colleges, apprenticeships, and community center programs. A couple people highlighted the need for people's wages to meet rising costs of living.

Need for Jobs Closer to Where People Live

Some people expressed a desire to reduce commuting, especially trips to Portland, and to have more jobs integrated into neighborhoods. This included support for neighborhood commercial areas, mixed-use developments that include jobs, and flexible zoning that allows low-impact employment in or near homes. However, a couple people wanted to ensure requirements for commercial uses do not prevent development, especially housing.

Workplaces are economically and socially important

Many people spend a significant amount of time at businesses and workplaces when not at home. Businesses and jobs draw people to Vancouver with many people sharing that they either moved to or visit Vancouver for work, or workforce development. Many people value local markets, restaurants, shops, and services, while some also value non-local chains, both as economic drivers and places to gather.

Parks, Recreation, Open Space, and Community Well-Being

People value parks, green spaces, and community centers and access to these places

Many people value parks, green spaces, and community centers and wanted to these maintained and increased. Access was discussed both in terms of physical access and financial access. A few people shared that they value the mental and physical health benefits that parks and green space offer.

- Some places mentioned include Marshall, Waterfront Park, Water Resources and Education Center, Fourth Plain Forward, Ike Memorial Park, and Frenchman's Bar.
- Events mentioned include Powwows, First Friday Art Walks, and Pride events.

Community centers for connection

Many people valued community centers and saw them as places to gather, connect, express, and learn. Some people had requests specifically for

- Culturally-specific centers,
- Smaller, grassroots, drop-in spaces,
- Teen and youth-focused centers, and
- Affordable memberships for income-burdened families

Quality parks and green space

Some people desire upgrades to existing parks and community centers. Some people noted specific park features that they like / would like including:

- Sports courts, skateparks, yoga/workout areas, gardens
- Dog-friendly amenities, rain shelters, adult-friendly spaces

- Bathrooms, paved trails, stages, interactive art, scenic viewpoints
- More mature trees, especially in underserved neighborhoods
- Water related-recreation (river, pools, waterparks)

Recreation as transportation

A few people saw opportunities for recreational spaces to also support transportation, like bike / pedestrian paths.

Transportation and Mobility

People want to be able to easily, safely, and quickly get to places they want to go

Some people highlighted the connection between transportation and land use, and the need for these to complement each other, particularly for transit. For example, locating transit where housing is being added and where essential services exist (and vice versa), and considering how remote work could impact transportation needs.

Driving is convenient

Many people drive and see the need to drive/have a car as something that is not going to go away any time soon. Some people voiced frustration or concern about changes that make driving more costly (both in terms of time and money). Many people had concerns about growth leading to more vehicle traffic and about the safety, air pollution, and noise impacts associated with vehicles. Some supported changes that would allow people to not need to drive/have a car.

Use of and improving non-driving options

Many people voiced support for walking, biking/small mobility, and/or transit but shared that improvements in physical infrastructure, comfort/safety, and service are needed to make these viable transportation options. A few people see these modes in competition with each other in terms of infrastructure and investments. These modes seemed to be more important to youth and seniors than to other ages, and students also use the school bus.

> Bike / Pedestrian - People often called for more sidewalks. A few people shared that they value health and social benefits these modes offer. One person noted that rainy weather can deter biking.

Transit - People often called for more frequent transit service and occasionally highlighted the desire for faster travel times and stops closer to their origin/destination, including outside of Vancouver. A few people had concerns about transit negatively impacting personal safety and comfort. A couple people suggested adding modes for shorter distances and adding night services, but there were mixed feelings about adding light rail (MAX) as an option.

Spaces for transportation can support additional community needs

Some people highlighted that spaces for transportation can serve other purposes and vice versa. For example, transit centers could be used as gathering places and shelters, bike/ped paths for recreation, streets for events and murals, and parking lots for housing or bike gardens.

Infrastructure, Public Facilities and Services, and Utilities

Public facilities are important places for the community

Many people, especially youth and seniors, value and spend a lot of time at schools, libraries, community centers.

Quality community spaces

Many people desire clean, updated, and well-maintained public spaces, with some calling for repairs and upgrades to specific community centers, streets, and sidewalks. At the same time, some people had concerns that improvements may lead to displacement or increases in cost of living. Some people highlighted how incorporating public art, especially murals, in public spaces enhances the quality.

Infrastructure and services must keep pace with growth

Many people highlighted this need and brought it up in terms of utilities, transportation infrastructure, emergency services, traffic, air quality, jobs, housing, and parks.

Infrastructure needs to support resilience and be resilient

Many people see infrastructure, public facilities and services, and utilities as supporting resilience and needing to be resilient itself – this includes schools, public buildings, emergency services, electricity, transit stops / centers, and

trees. A couple people highlighted the need to factor in climate, particularly Vancouver's rainy season, to infrastructure investments.

Annexation

Curiosity about relationship between annexation and plan

Many people were curious about annexation processes (when where and how it will happen) and how annexation relates to comprehensive planning. A few people specifically asked if annexation could be used to meet population, housing, and jobs targets.

Questions about how to upgrade and serve the Urban Growth Area

A couple people were concerned about cost of annexation and ability to provide sufficient services, like police and fire, if areas are incorporated into the city. People want the City to coordinate with county to facilitate a smooth transition.

Implementation

Coordination and partnerships

Desire for coordination between planning and other departments, county, and community organizations. One person highlighted the importance of partnerships in addressing housing needs. Some partners that were mentioned during this phase were Council for the Homeless, NAYA homeless shelter, VHA, and SWACH.

Land Use Alternative Maps

Alternative Maps

- A few voiced a specific preference for Alternative 2.

Low-scale Neighborhood and Medium-scale Neighborhood

- A few people had concerns about existing single-family/Low-scale neighborhoods being upzoned to either Medium-scale Neighborhood or Mixed-use Neighborhood.
- Many supported having some commercial uses in residential areas.
- Requests for Low-scale: 2308 La Frambois Rd and 906 Topeka Lane

- Requests for Medium-scale: The property next to 13604 SE 20th Circle, Vancouver, WA 98683 and parcels 35140000, 3516000 and 35150000.

Mixed-use Neighborhood and Regional Activity Center

- People most often located these at key intersections and corridors dispersed across the city, with an emphasis on corridors served by transit like Fourth Plain and Mill Plain.
- Requests for Regional Activity Center: Columbia Business Center

Institutional / Campus

- Some people wanted to keep or increase hospitals and emergency rooms, suggesting the need to keep or increase Institutional / Campus districts.

Industrial / Employment and Heavy Industrial

- Creating and maintaining land for jobs was particularly important to high school students
- A few people noted the negative impacts industrial has on adjacent land uses where people live and visit, suggesting the need for separation/mitigation between industrial districts (IE and HI) and districts that allow residential (LS, MS, MX, and RA).

Parks and Natural Areas

- Many people wanted more parks and to preserve existing parks. A couple people suggested more parks where there is more density.
- A few people identified corrections needed for parks land, which have already been corrected in the two action alternatives (DuBois Park, South Cliff Park, Burnt Bridge Creek School Park).

PHASE 3: DRAFT PLAN AND CODE ENGAGEMENT AND OUTREACH SUMMARY

February and March 2026

Contents

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Introduction

Phase 3 engagement took place during Winter 2026. The purpose of Phase 3 engagement was to report back to the community and project participants on what we heard from them previously and demonstrate how this is reflected in draft 2045 Comprehensive Plan and updated development code. The goals of Phase 3 engagement were to:

- Inform the community about the draft plan and code process and content.
- Invite feedback and answer questions about the draft plan and code, specifically on items we missed or were unclear.
- Inform the community about final steps, including the Plan and code adoption process and the Final Environmental Impact Statement (FEIS) that support this.

This document summarizes engagement feedback from the community so that it can be incorporated into the **OUR VANCOUVER** Comprehensive Plan, specifically the final plan and code details before they're brought to City Council for adoption in Spring 2026. It also notes common questions heard during this phase.

Engagement and Outreach Methods

Overview

- PDFs of the full draft plan and zoning code were posted to the City's website on February 19, 2026.
  - Links to these were posted on BeHeard, the LinkTree, and StoryMap.
- Feedback form open from February 19 through March 31, 2026.
- Updated online StoryMap with an overview of the draft plan and zoning code. This included:
  - State requirements, community input, and goals by plan chapter,
  - Descriptions of the new zoning districts,
  - Information about final steps, and
  - Links to the full draft plan and code, the interactive Preferred Land Use Alternative map, and feedback form.
- Four Community Presentations
  - Two virtual, one during the lunch hour and one on a weekday evening.
  - Two in-person, one in East Vancouver on a weekday evening and one in West Vancouver midday over the weekend.
- 16 additional group-specific discussions with Community Partners, community working groups, boards and commissions, and neighborhood associations.
- Five City Council workshops and six Planning Commission workshops.
- Outreach promoted the StoryMap and Community Presentations via multiple email lists, social media, direct emails to partners and neighborhood associations, City website, BeHeard, and local news outlets.

Engagement Methods

In total, 150 questions and feedback were received through the following methods.

Community Presentations

Description: Four 2-hour presentation and Q&A sessions on the draft Comprehensive Plan and Zoning Code for community members to see how community input, City priorities, and state requirements shaped the draft plan

and zoning code, meet the project team, and ask questions. Events were free and open to the public.

Dates:

- 2/19/2026 – Virtual: Presentation and recording
- 2/26/2026 – Virtual: Presentation and recording
- 2/28/2026 – City Hall: Presentation
- 3/4/2026 – Cascade Park Community Library: Presentation and recording

Participation: Approximately 121 total public attendees (38 at 2/19, 25 at 2/26, 23 at 2/28, 35 at 3/4). 92 questions/comments received.

Outreach: Information and RSVP link posted to City calendar, LinkTree, and on the project BeHeard page; sent out via the Our Vancouver, Vancouver Connects, and Office of Neighborhood e-newsletters; sent out in direct emails to partner organizations and community working groups; and posted on social media. Local news outlets also advertised the community presentations. Additionally, recordings and slides from the presentations were posted to the BeHeard page and sent out in the Our Vancouver e-newsletter and in direct emails.

Feedback Form

Description: Online feedback form for people to provide feedback on the draft plan and code online at a time and place that is convenient for them. Primarily, it asked people if we missed anything important, with additional space for open-ended questions/feedback. Feedback form was available in English, Spanish, Russian, Vietnamese, Ukrainian, Chinese (simplified), and Chuukese.

Date(s): Open from February 19, 2026, through March 31, 2026

Participation: 33 feedback form submissions received that included feedback.

Outreach: Link to form was included in LinkTree, which was shared in slides, over chat during virtual Community Presentations, and in a handout at in-person Community Presentations and in outreach flyers. Link posted on BeHeard page and in StoryMap. Link included in Our Vancouver e-newsletters and direct emails to partners and neighborhood associations.

Our Vancouver Email Inbox

Description: Shared Outlook mailbox (OurVancouver2045@cityofvancouver.us) for community members to contact the project team, ask questions, and share

their thoughts. E-newsletters with project updates were also sent from this email address.
Date(s): This summary focuses on emails received from February 19, 2026 through March 31, 2026, which aligns with the release of the draft plan and code and the close of the feedback form. However, the email has been active since early on in the plan update process.
Participation: 23 emails received
Outreach: Email address was listed on the StoryMap, hardcopy materials, social media posts, Our Vancouver e-newsletters, presentations, and Be Heard. Email has been shared throughout the entire course of the plan update process.

2 hardcopies of feedback were also received.

Outreach Details

- **Be Heard** – project webpage
- **StoryMap** – online overview of draft plan and zoning code
  - 1,600+ views, 2/19/2026-3/31/2026
- **Interactive Map** – online Preferred Alternative map
  - 1500+ views, 2/19/2026-3/31/2026
- **Our Vancouver e-newsletter**
  - 12 emails sent: 1/8/2026, 1/22/2026, 1/29/2026, 2/4/2026, 2/19/2026, 2/19/2026, 2/23/2026, 2/26/2026, 2/27/2026, 3/2/2026, 3/6/2026, 3/12/2026
  - From 904 to 970 recipients.
- **Vancouver Connects** e-newsletter
  - Three emails sent: January 2026, February 2026, March 2026
- **Office of Neighborhoods** e-newsletter
  - Three emails sent: 1/30/2026, 2/13/2026, 2/27/2026
- **Citywide Quarterly Newsletter**
  - Hardcopy mailed to all residents in Vancouver: March 2026
- **Local news outlets**
  - The Columbian 2/16/2026: City to discuss Vancouver's 20-year growth plan with residents
  - KATU 2/17/2026: Vancouver plans for growth as it eyes second-largest city status in Washington

    - The Columbian 2/26/2026: Vancouver weighs adding bike parking requirements to comprehensive plan update
    - The Columbian 3/28/2026: High anxiety over high density: Vancouver residents worry that city's plans for more housing will erode quiet neighborhoods
    - The Columbian 3/28/2026: City of Vancouver foresees 44,100 new units in 20 years
- City website/calendar
    - Community Presentations were advertised on the calendar on the City website
- Social media - Facebook, Instagram, LinkedIn, NextDoor
    - 10 posts on Facebook and Instagram: 2/6/2026, 2/20/2026, 2/22/2026, 2/24/2026, 3/2/2026. 2 on Linkedin. 1 on NextDoor.
    - Community Presentations were also shared as Facebook events on 1/29/2026
- Direct emails to partners and neighborhood associations.
- Flyers posted at the entrance to City Hall and on the BeHeard website and were provided to City engagement staff, Community Partners, and in direct emails to partners and neighborhood associations to share with community members.

Summary of Questions and Feedback

This section provides an overview of community questions and feedback that emerged during Phase 3 of community engagement for the **OUR VANCOUVER** Comprehensive Plan. It includes feedback received through Community Presentations, the feedback form, the Our Vancouver email inbox, and hardcopies provided to staff.

The feedback form was created to help the public review the plan chapters and zoning district regulations and confirm they align with community input, state laws, and City priorities. It asked whether anything was missing from each chapter and whether the zoning district regulations made sense. Some people said the draft chapters and zoning districts were complete or chose not to provide specific feedback. The feedback that was submitted focused on several key topics, which are summarized below.

The summary section below quantifies feedback received by the terms "few," "some," or "many." *Few* means less than 10 comments received; *Some* or several means between 10-20 comments received; and *Many* means 20 or more comments received on a particular topic.

Background Clarifications

Many people had questions related to how zoning works, the application of state laws, targets for population, housing, and jobs, demographics, coordination with the County, partner agencies, and nearby cities, and annexation.

Medium-Scale Neighborhood

Many people had questions or concerns about the Medium-scale Neighborhood zoning designation, particularly in existing single-family neighborhoods while a few people responded that the district's regulations make sense or were supportive. Primary concerns included the 75-foot building height and increased densities.

Vehicle Traffic and Parking

Many people were concerned that increased density and a greater mix of uses will lead to increases in vehicle traffic and vehicles parked on-street in those areas. The concerns were mainly that increased vehicle traffic and parking would lead to increases in noise and air pollution and decreases in safety and convenience.

Engagement

Some people felt that they were not adequately notified of or not heard in the plan update process, while a few others expressed appreciation for engagement efforts. There was a general desire to continue to be engaged in land use and development decisions.

Public Services and Infrastructure

Some people had questions/concerns about how public services and infrastructure (e.g., water, sewer, stormwater, sidewalks, parks, roads and emergency services) will be provided, maintained, and funded to meet the needs of an increasing population and associated development.

Green Space and Trees

Some people expressed continued support for and desire for inclusion of green space, including support for trees, natural areas, parks, gardens, and green roofs.

Covenants, Conditions, and Restrictions (CC&Rs)

Some people had questions/concerns about potential conflicts between a property's zoning and a property's Covenants, Conditions, and Restrictions (CC&Rs).

Property Values and Taxes

Some people had questions/concerns about how the zoning changes will impact property values or increase property taxes, particularly for properties that are proposed to be upzoned.

Additional Plan and Code Details

Individuals also had specific comprehensive plan and zoning code suggestions and questions that staff reviewed or responded to including those that related to:

- Solid waste,
- Lot standards (e.g., setbacks, façade articulation),
- Bicycle parking,
- Design/aesthetics,
- Easements for bicycle/pedestrian connectivity,
- Climate action and environmentalism, and
- Non-conformities.

Next Steps

This summary and information will be shared at City Council and Planning Commission meetings. Many common questions were addressed during community presentations and discussions. Common questions will also be addressed in an updated FAQ, which will be shared through the Our Vancouver email list and posted on the Our Vancouver webpage. Feedback that aligns with state law, City priorities, and past community input will inform

revisions to the draft plan and code before they're brought through the approval process.

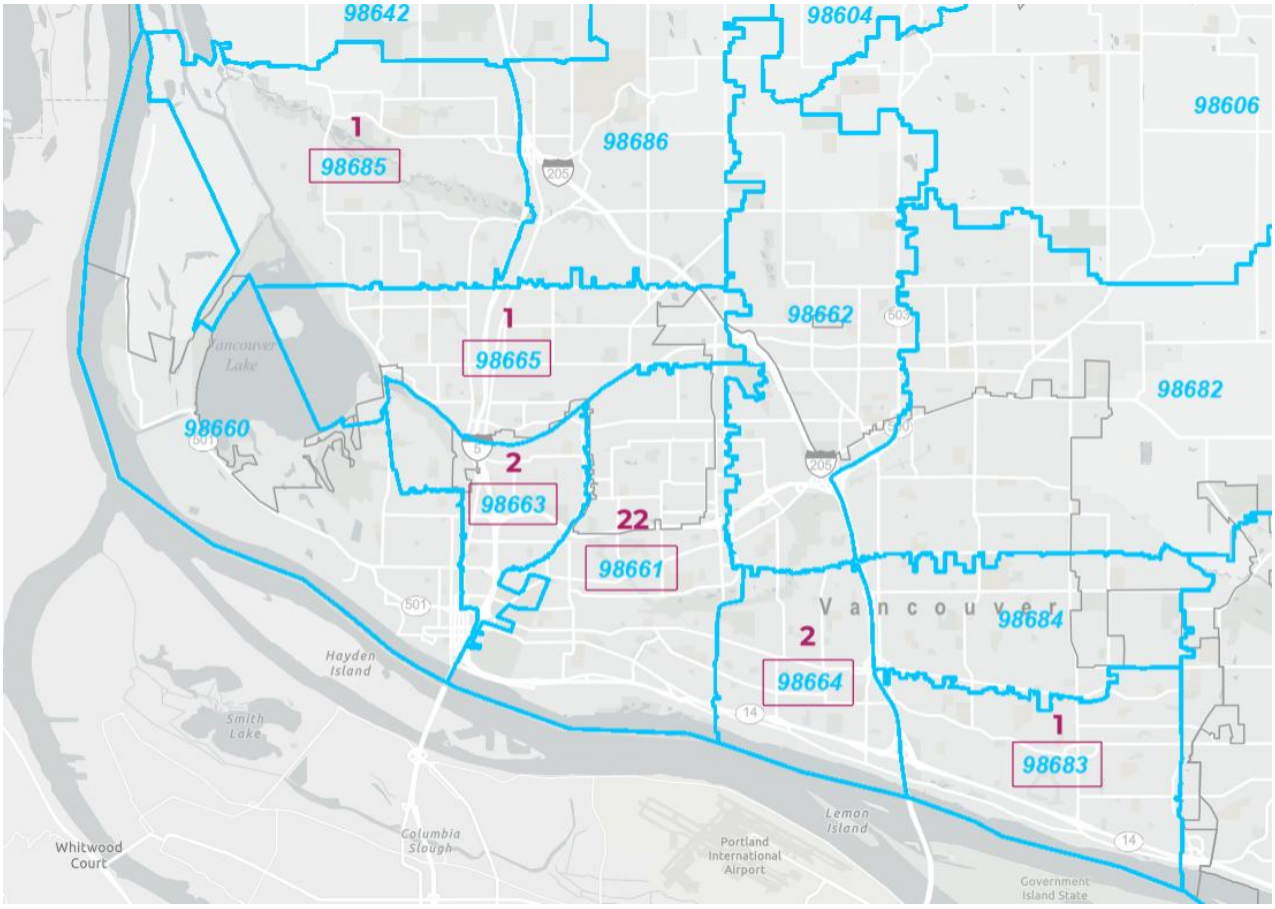
Demographics of Respondents

The online feedback form contained additional optional demographic questions. The following subsections summarize demographics of individuals who chose to respond to these questions. There was a total of 33 feedback form responses and percentages below are based off this total.

Zip Codes (30 responses)

Comments came from 7 zip codes, with most responses from 98661 (66.7%). The 98661 zip code is generally west of Andresen Road, east of Saint Johns Boulevard and I-5, and south of 78th Street. See Figure 1.

Figure 1. Zip Codes in the Vancouver area and number of responses per zip code



Gender (26 responses)

The gender breakdown of respondents is as follows:

- Female, 36.4% (12)
- Male, 33.3% (11)
- Non-binary, 0.0% (0)
- Transgender, 3.0% (1)
- Prefer not to answer, 9.1% (3)
- Self-identified, 3.0% (1)
- *Skipped question*, 24.2% (8)

(Note: Percentages don't add to 100% because respondents could select more than one answer.)

Age (22 responses)

One third of responses came from respondents over the age of 65. The age breakdown of respondents is as follows:

- Under 18 years, 0.0% (0)
- 18 – 24 years, 0.0% (5)
- 25 – 34 years, 3.0% (1)
- 35 – 44 years, 21.2% (7)
- 45 – 54 years, 6.1% (2)
- 55 – 64 years, 3.0% (1)
- Over 65 years, 33.3% (11)
- *Skipped question*, 33.3% (11)

Race/Ethnicity (28 responses)

About half of respondents (51.1%) identified as white or European American. Responses from non-white/European American respondents was minimal. The racial/ethnic breakdown of respondents is as follows:

- American Indian or Alaska Native, 3.0% (1)
- Asian or Asian American, 0.0% (0)
- Black or African American, 3.0% (1)
- Hispanic or Latino/a/e, 0.0% (0)
- Middle Eastern or North African, 0.0% (0)
- Native Hawaiian or Pacific Islander, 0.0% (0)
- White or European American, 51.1% (17)
- Other, 3.0% (1)
- Prefer not to answer, 26.9% (9)
- *Skipped question*, 15.2% (5)

(Note: Percentages don't add to 100% because respondents could select more than one answer.)

Language (23 responses)

Responses from people who speak a language other than English respondents was minimal. 1 respondent speaks Spanish (3.0%) and another respondent selected "Other" (3.0%). 33.3% respondents said that they do not speak a language other than English fluently and 60.6% of respondents selected prefer not to respond or skipped the question. No responses were received in a language other than English.

Income (26 responses)

The income breakdown of respondents is as follows:

- Below $19,999, 0.0% (0)
- $20,000 – $49,999, 3.0% (1)
- $50,000 – $89,999, 6.1% (2)
- $90,000 – $129,999, 3.0% (1)
- $130,000 – $149,999, 12.1% (4)
- Above $150,000, 6.1% (2)
- Prefer not to answer, 48.5%, (16)
- *Skipped question*, 21.2% (7)

Disability (27 responses)

Approximately 15.2% of respondents have a disability.

Housing Situation (29 responses)

A large majority of respondents (81.8%) own their house. Only 1 respondent (3.0%) rents. 15.2% of respondents selected prefer not to answer or skipped the question.



City of Vancouver

2023 Inventory of Community and Government Operations Greenhouse Gas Emissions

SEPTEMBER 9, 2024

Produced by the City of Vancouver Climate Program with Assistance from ICLEI – Local Governments for Sustainability USA

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Executive Summary

The City of Vancouver recognizes that greenhouse gas (GHG) emissions from human activity are catalyzing profound climate change, the consequences of which pose substantial risks to the future health, wellbeing, and prosperity of our community. To respond to this crisis, the Vancouver City Council adopted the Climate Action Framework in December 2022 and set a target year of 2040 for community-wide carbon neutrality.

To monitor progress and adjust strategies to meet the goals set out in the Climate Action Framework, Council directed the City to update its Greenhouse Gas (GHG) Inventory every four years. This report provides estimates of greenhouse gas emissions resulting from activities in City of Vancouver as a whole in 2023 as well as emissions specifically from the City's government operations after one year of work under the Climate Action Framework. The latest update follows previous inventories conducted in 2019 and 2007.[1]

As of 2023, emissions community-wide are down 27% and municipal operations emissions have fallen 54% as measured relative to their respective 2007 baseline inventories (Figure 1).

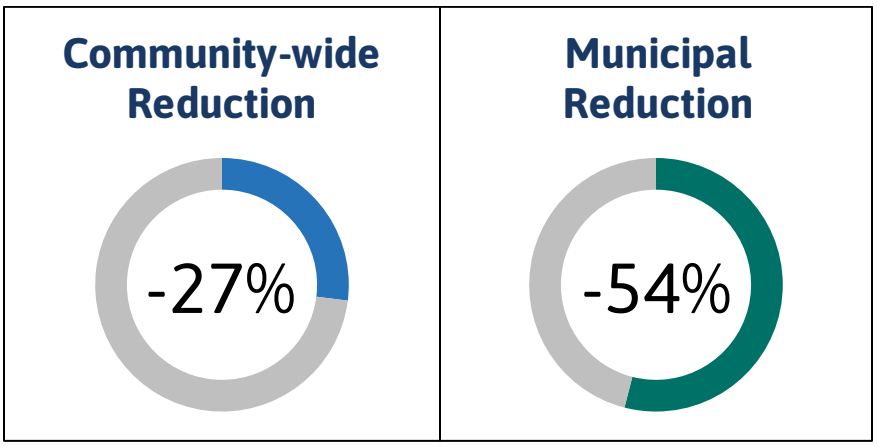

Figure 1: Emissions Reduction from 2007 baseline to 2023

These inventories demonstrate that ambitious goals are critical to motivate the necessary action to stem the worst impacts of climate change. The City has made significant progress on municipal emissions reduction by investing in capital projects and fuel switching in our fleet vehicles, yet more aggressive action is needed to reach our interim targets and set a leading edge pace for climate action in Vancouver.

[1] Over time, available data sources and best practices for greenhouse gas accounting have improved, which can result in changes between inventories. The 2019 and 2023 GHG Inventories were conducted using the same methodology, but the original 2007 GHG Inventory did not measure all of the same emissions sectors or use the same accounting tools and practices. More details on updates to the 2019 inventory for alignment with the 2023 inventory can be found in Appendix B.

In addition to energy efficiency and renewable energy projects to offset overall energy demand by government facilities, forecasts show that transitioning government buildings and vehicles, where appropriate, to electric power sources will put the City in a position to benefit from the rapid decarbonization of the electricity grid mandated by the Clean Energy Transformation Act (CETA). This state policy requires Washington's electric utilities to be GHG neutral by 2030 and 100% carbon-free by 2045, which will drive down emissions in buildings, water and wastewater treatment, street lights, and fleet vehicles that run on electricity.

While cleaner electricity will be a driving force in meeting municipal emissions targets, it is not enough on its own to maintain a downward trajectory for emissions community-wide. Population growth and the return to pre-pandemic travel norms are expected to push transportation sector emissions upward over time without significant interventions to shift behavior.

Many communities in the United States have started to take responsibility for addressing climate change at the local level, and the City of Vancouver has significant and direct influence over community-wide emissions through its policies that determine how land use evolves and changes over time and the standards it sets for building and road development. Reducing fossil fuel use in the community can have many benefits in addition to reducing greenhouse gas emissions. More efficient use of energy decreases utility and transportation costs for residents and businesses. Retrofitting homes and businesses to be more efficient creates local jobs. In addition, when residents save on energy costs, they are more likely to spend at local businesses and add to the local economy. Reducing fossil fuel use improves air quality, and increasing opportunities for walking and bicycling improves residents' health.

These areas are crucial for fostering sustainable community growth, but changing the existing built environment and shifting human behavior are two of the hardest challenges we face in shifting our climate future. As our community grows in its size, economy, and vibrancy, reducing emissions in the Buildings and Transportation sectors will require widespread partnership with private citizens and businesses.

This inventory marks the City's first assessment of the measurable impacts of its early climate action efforts, and these results will inform further refinement and prioritization of the most impactful community actions in the 2026 update to the Climate Action Framework.

Key Findings

Figure 2 shows communitywide emissions by sector, which have declined 27% overall relative to the 2007 baseline inventory. The largest contributors remain On-Road Vehicles (37%) and Buildings & Energy as a sector (37%), followed by Other Emissions (11%), which include process and fugitive emissions from refrigerants, natural gas leakage, and electric power transmission losses. Actions to reduce emissions in all sectors are a key part of the City of Vancouver's Climate Action Framework. However, meeting community-wide carbon-neutrality goals will require widespread private partnership to shift behavior and retrofit existing buildings.

Figure 3 shows local government operations emissions, which have declined 54% relative to the 2007 baseline. Water & Wastewater Treatment accounts for a vast majority (47%) of these emissions. The next largest contributor is Buildings & Facilities (23%), followed by Fleet (11%) and Employee Commute (7%). Paired with the greening of our purchased electricity, there is a strong pathway to realize our municipal climate goals with continued investment in emissions reduction measures. Capital projects already planned over the next biennium and beyond will significantly cut emissions in our largest sectors.

The Inventory Results section of this report provides a detailed profile of emissions sources within Vancouver; information that is key to guiding local reduction efforts.

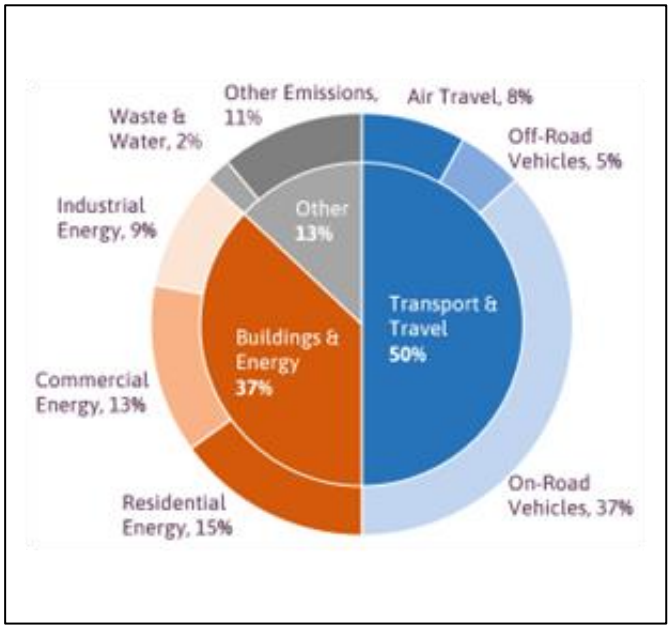

Figure 2: Community-wide Emissions by Sector

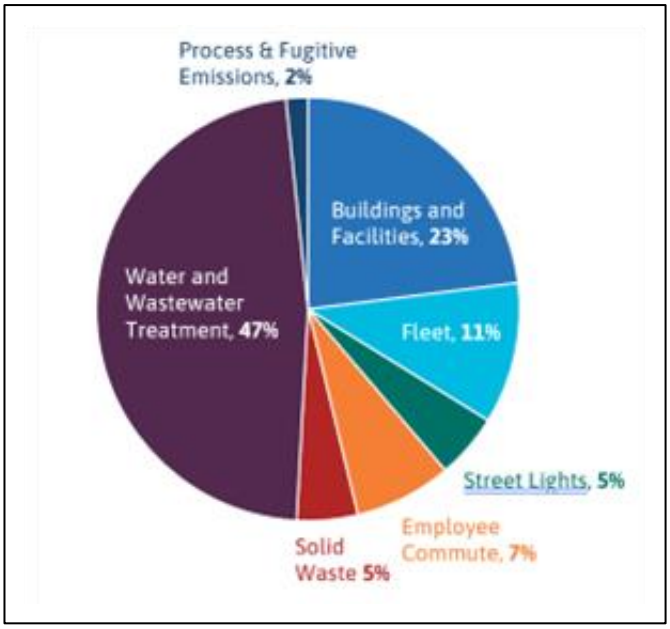

Figure 3: Government Operations Emissions by Sector

Inventory Methodology

Understanding a Greenhouse Gas Emissions Inventory

This report presents emissions from both the Vancouver community as a whole and from operations of the City of Vancouver municipal government. The government operations inventory is mostly a subset of the community inventory, as shown in Figure 4.



Figure 4: Relationship of Community and Government Operations Inventories

Emissions tracking and reporting serves multiple purposes. Climate targets and plans need to be reviewed regularly to bring in the necessary level of ambition to achieve net-zero emissions by 2040. Documentation of emissions sources allows transparency and accountability to the public. And trends observed year-over-year provide direction for large planning processes.

To complete this inventory, City of Vancouver utilized tools and guidelines from ICLEI - Local Governments for Sustainability (ICLEI), which provides authoritative direction for greenhouse gas emissions accounting. Over time, available data sources and best practices for greenhouse gas accounting have evolved, which can result in changes between inventories. The 2007 GHG Inventory, which was the City's first inventory and is used as a baseline for emissions reduction targets, draws on several protocols that were early iterations of what we use today but does not include all of the same sources of emissions that are accounted for in 2019 and 2023.

The 2019 and 2023 inventories use the approach and methods provided by the U.S. Community Protocol for Accounting and Reporting Greenhouse Gas Emissions (Community Protocol) and the Local Government Operations Protocol for Accounting and Reporting Greenhouse Gas Emissions (LGO Protocol), both of which are described below. For 2023, calculations were made using ICLEI's ClearPath software, and Quality Assurance/Quality Control was conducted by ICLEI.

Three greenhouse gases are included in this inventory: carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O). Many of the charts in this report represent emissions in "carbon dioxide equivalent" (CO_2e) values, calculated using the Global Warming Potentials (GWP) for methane and nitrous oxide from the IPCC 5th Assessment Report.[2]

[2] The Global Warming Potential of Carbon Dioxide (CO_2) is 1, Methane (CH_4) is 28, and Nitrous Oxide (N_2O) is 265. (IPCC, 2014)

Community Emissions Protocol

Version 1.2 of the U.S. Community Protocol for Accounting and Reporting GHG Emissions[3] was released by ICLEI in 2019 and represents a national standard in guidance to help U.S. local governments develop effective community GHG emissions inventories.

The community inventory in this report includes emissions from the five Basic Emissions Generating Activities required by the Community Protocol. These activities are:

- Use of electricity by the community as reported by Clark Public Utilities
- Use of fuel in residential and commercial stationary combustion equipment
- On-road passenger and freight motor vehicle travel
- Use of energy in potable water and wastewater treatment and distribution
- Generation of solid waste by the community

The community inventory also includes the following activities:

- Wastewater processing and combustion of biosolids
- Air travel within Vancouver and itinerant air traffic by Vancouver residents
- Public transit
- Off-road passenger and freight travel, including marine and rail
- Fugitive emissions from key refrigerants and natural gas leakage
- Electric power transmission losses

Local Government Operations (LGO) Protocol

In 2010, ICLEI, the California Air Resources Board (CARB), and the California Climate Action Registry (CCAR) released Version 1.1 of the LGO Protocol.[4] The LGO Protocol serves as the national standard for quantifying and reporting greenhouse emissions from local government operations.

The following activities are included in the LGO inventory:

- Electricity and natural gas consumption from buildings, facilities, and street lights
- Use of energy in potable water and wastewater treatment and distribution
- Wastewater treatment processes, including combustion of biosolids
- On-road transportation from employee commute and vehicle fleet
- Solid waste generated at government facilities
- Fugitive emissions from key refrigerants and natural gas leakage

[3] ICLEI. 2012. US Community Protocol for Accounting and Reporting Greenhouse Gas Emissions. Retrieved from http://www.icleiusa.org/tools/ghg-protocol/community-protocol

[4] ICLEI. 2008. Local Government Operations Protocol for Accounting and Reporting Greenhouse Gas Emissions. Retrieved from http://www.icleiusa.org/programs/climate/ghg-protocol/ghg-protocol



Community Emissions Inventory Results

The City of Vancouver aims to reduce community-wide greenhouse gas emissions 80% by 2030 and become carbon neutral by 2040. Since 2019, Vancouver's community-wide greenhouse gas emissions have continued to decline and now amount to a 27% reduction relative to the 2007 baseline inventory.

This change in overall emissions appears to be driven largely by buildings being powered by cleaner electricity sources (i.e. grid decarbonization) and lingering effects of the COVID-19 pandemic on transportation patterns, as well as increased appliance and vehicle efficiency. In other sectors, improved composting is keeping emissions associated with landfilled solid waste down, while fugitive emissions from refrigerants and air conditioning have increased.

The total communitywide emissions for the 2023 inventory are shown in Table 1 and Figure 5.

Table 1: Communitywide Emissions Inventory (2023)

Sector	Fuel or Source	2023 Usage	Usage unit	2023 Emissions ($MTCO_2e$)	% Change from 2019*
Residential Energy	Electricity (Clark Public Utilities)	935,798,884	kWh	132,074	0%
	Natural gas (Northwest Natural)	17,748,236	Therms	94,397	5%
Residential Energy total				**226,471**	**2%**
Commercial Energy	Electricity (Clark Public Utilities)	768,724,075	kWh	108,494	-11%
	Natural gas (Northwest Natural)	14,949,639	Therms	79,512	7%
Commercial Energy total				**188,006**	**-4%**
Industrial Energy	Electricity (Clark Public Utilities)	349,090,417	kWh	49,269	14%
	Natural gas (Northwest Natural)	15,424,459	Therms	81,864	251%
Industrial Energy total				**131,133**	**63%**
On-Road Transportation	Gasoline (passenger vehicles)	978,284,636	VMT	390,148	-15%
	Diesel (passenger and freight)	101,318,961	VMT	145,367	-13%
Transit	Diesel	4542253	VMT	7,325	-8%
	Gasoline	30152	VMT	40	-47%
Aviation	Aviation Gasoline	11,336,811	gal	110,404	-73%*
Off-Road	Diesel	508,807	MMBtu	37,659	4%
	Gasoline	297,668	MMBtu	21,420	15%
	LPG	107,177	MMBtu	6,600	1468%
	CNG	11,178	MMBtu	692	180%
Marine (Freight)	Diesel	53,736	MMBtu	3974	82%
Rail (Freight)	Diesel	21,909	MMBtu	1620	-70%
Transportation total				**725,249**	**-34%**
Solid Waste	Waste Generated	128,152	Tons	23,634	-10%
Solid Waste total				**23,634**	**-10%**
Water & Wastewater	Water Treatment Energy Usage	21,800,000	kWh	3,077	1%
	Wastewater Treatment Energy Usage	17,664,192 3,960	kWh Therms	2,514	9%
	Wastewater Treatment	6,068	million gal/yr	205	6%
	Nitrogen Discharge	1,258	kg N/day	956	18%
	Combustion of Biosolids	21	MT/day	1,866	19%
Water & Wastewater total				**8,618**	**9%**
Process & Fugitive Emissions	Fugitive Emissions from Natural Gas Distribution			8,350	36%
	Process Emissions from Refrigerant Use (HFCs and PFCs)			130,084	22%
Process & Fugitive total				**138,434**	**23%**
Upstream Impacts of Activities	Electric Power Transmission Losses			15,066	-1%
Upstream Impacts total				**15,066**	**-1%**
Total community-wide emissions				**1,456,611**	**-17%**

*Table 1 Note: The percent change from 2019 is based on adjusted 2019 GHG Inventory numbers reported in Appendix B. Also, much of the -73% change reported in Aviation is due to variation in how emissions were calculated in 2019 and 2023. This is the only sector where different methodologies were used between the two inventory years.

Figure 5 shows the distribution of communitywide emissions by sector. On-road vehicles are the largest contributor (37%), followed by residential (15%) and commercial (13%) buildings and fugitive emissions from refrigerants and natural gas distribution (Other Emissions, 11%). Industrial Energy (9%) and Waste & Water (2%) sectors are other areas where the City has influence to help drive down overall community emissions.

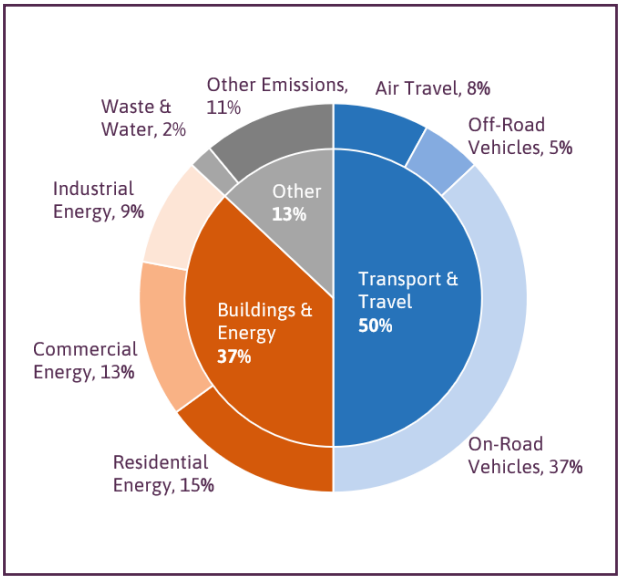

Figure 5: Community-wide Emissions by Sector

Even as population increased from 2019 to 2023, Transportation sector emissions have declined due in large part to lingering effects of the COVID-19 pandemic. Community-wide vehicle miles traveled increased since 2020 but still have not reached pre-pandemic levels. Additionally, a change in methodology for attributing Air Travel from Portland International Airport for Vancouver travelers is contributing to the decline in total Transportation emissions in 2023. These reductions in overall Transportation emissions were significant enough to offset smaller increases in emissions in other sectors.

In Buildings, actual energy use has increased in all three sectors, particularly residential. However, GHG emissions remained steady or went down for electric customers, despite this increasing demand. This is likely a result of increased clean energy in the Clark Public Utilities resource mix. Natural gas usage and related emissions are both increasing in parallel. The industrial sector saw a particularly large increase in natural gas usage by businesses who procure fuels themselves and transport it via NW Natural's system.

Other sectors that saw increased emissions were Water & Wastewater and Process & Fugitive emissions. Water & Wastewater energy use is directly influenced by the amount of water that requires treatment on behalf of the community, which increases along with the population. Water conservation programs are promising for helping to reduce emissions in this sector, and both utilities continue to invest in major capital projects to modernize treatment systems and reduce emissions.

Lastly, Solid Waste saw a decrease in emissions despite an increase in solid waste collected from residences and businesses in Vancouver and sent to the landfill. This is likely due to increased rates of composting. Although this inventory does not account for composting directly, the waste characterization includes much less organic material going to the landfill than in previous years.

Next Steps

Changing the existing built environment and shifting human behavior are two of the hardest challenges we face in shifting our climate future. As our community grows in its size, economy, and vibrancy, reducing emissions in the Buildings and Transportation sectors will require widespread partnership with private citizens and businesses.

However, the City does have significant and direct influence over community-wide emissions through its policies that determine how land use evolves and changes over time and the standards it sets for building and road development. These areas are within the City's immediate control and are crucial for fostering sustainable community growth. By prioritizing emissions-reducing strategies in the upcoming Comprehensive Plan Update and Green Building Strategy, the City has two powerful and immediate opportunities to help mitigate the expected rise in community emissions.



Government Operations Emissions Inventory Results

The City of Vancouver aims to reduce greenhouse gas emissions from local government operations 80% by 2025 and become carbon neutral by 2040.

The City has made steady progress in reducing its greenhouse gas emissions from municipal operations, which total approximately 1% of all emissions community-wide. As of 2023, there has been a 54% reduction in municipal emissions as measured relative to the 2007 baseline inventory. An additional 10,600 $MTCO_2e$ will need to be cut to reach the 80% reduction target.

Government operations emissions for inventory year 2023 are shown in Table 2 and Figure 6.

Table 2: Local Government Operations Inventory (2023)

Sector	Fuel or Source	2023 Usage	Usage unit	2023 Emissions ($MTCO_2e$)	% Change from 2019*
Buildings & Facilities	Electricity	19,520,695	kWh	2,755	-19%
	Natural Gas	299,180	Therms	1,591	17%
Buildings & Facilities total				**4,346**	**-9%**
Street Lights	Electricity	6,632,058	kWh	936	-29%
Street Lights total				**936**	**-29%**
Vehicle Fleet	E-10 Gasoline (on-road)	2,859,713	VMT	1,984	2%
	R99 Diesel (on-road)	785,156	VMT	14	-99%
	Propane Autogas (on-road)	40,055	VMT	31	NA
	E-10 Gasoline (off-road)	1,100	gal	9	-65%
	R99 Diesel (off-road)	11,842	gal	1	-98%
	Propane (off-road)	154	gal	1	-50%
Vehicle Fleet total				**2,040**	**-35%**
Employee Commute	Gasoline	31,84,508	VMT	1213	-35%
	Diesel	329,626	VMT	183	-33%
	Transit	172,422	VMT	10	-55%
Employee Commute total				**1,406**	**-35%**
Solid Waste	Waste Generation	5,315	Tons	877	-6%
Solid Waste total				**877**	**-6%**
Water & Wastewater	Water Treatment Energy Usage	21,800,000	kWh	3,077	1%
	Wastewater Energy – Electricity	17,664,192	kWh	2,493	8%

	Wastewater Energy – Natural Gas	3,960	Therms	21	11%
	Wastewater Energy – Diesel	28,663	gal	295	-5%
	Wastewater Treatment	7,653*	million gal/yr	259	7%
	Nitrogen Discharge	1,258	kg N/day	956	18%
	Combustion of Biosolids	21	MT/day	1,866	19%
Water & Wastewater total				**8,967**	**8%**
Process & Fugitive Emissions	Fugitive Emissions from Natural Gas Distribution			52	16%
	Process Emissions from Refrigerant Use (HFCs)			262	1091%
Process & Fugitive Emissions total				**314**	**369%**
Total government emissions				**18,886**	**-9%**

*Note: The percent change from 2019 is based on the adjusted 2019 GHG Inventory numbers reported in Appendix B.

Figure 6 shows the distribution of emissions among the sectors included in the inventory. Water & Wastewater Treatment (47%) represents the majority of emissions, followed by Buildings & Facilities (23%) and Fleet (11%). Employee Commute (7%), Street Lights (5%), Solid Waste (5%), and Fugitive Emissions (2%) account for a smaller but not insignificant portion of emissions that will also need to be cut to achieve the City's goals.

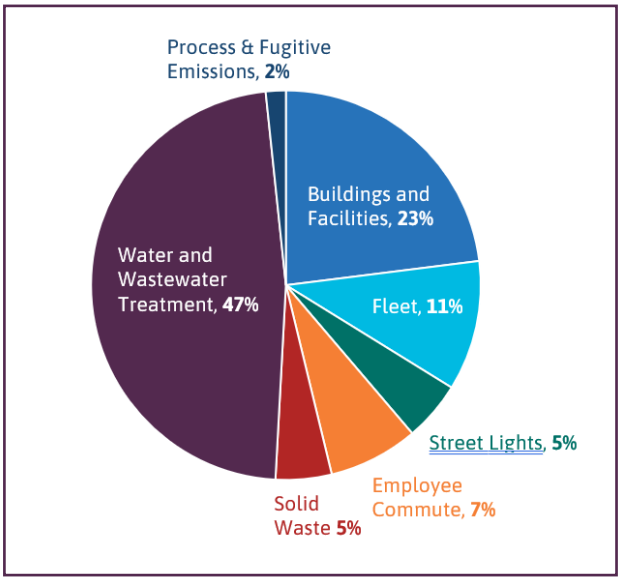

Figure 6: Local Government Operations Emissions by Sector

Between 2019 and 2023, significant progress was achieved through ongoing planning and projects, complemented by high-impact operational changes in 2023 and the influence of

external factors such as cleaner electricity sources. Figure 7 shows the change over time in municipal greenhouse gas emissions by sector.

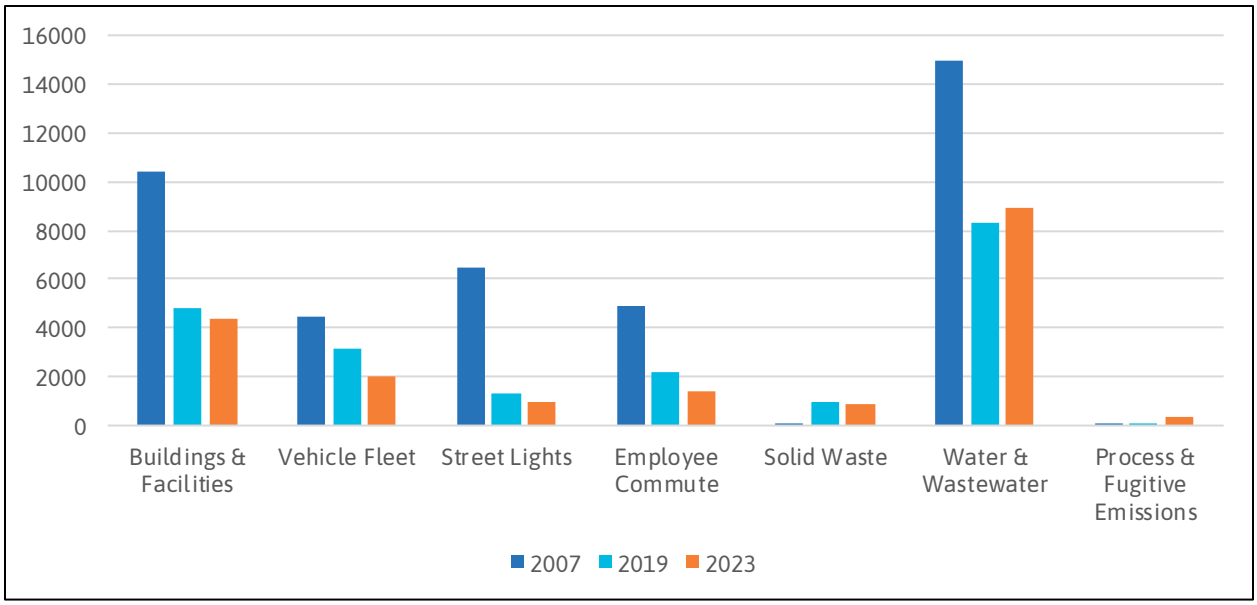

Figure 7: Change in Municipal GHG Emissions by Sector (2007, 2019, and 2023)

Significant factors driving recent changes in municipal emissions include:

- **Fuel Switching:** Fleet Services achieved some of the largest GHG reductions since 2019 through its innovative adoption of renewable fuels. As of 2023, all diesel vehicles and equipment used in City operations have fully transitioned from standard fossil fuel diesel to a 100% renewable, plant-based diesel fuel called R99. This change led to a significant decrease in GHG emissions and other air pollutants from the City's diesel fleet, leaving gasoline vehicles as the primary source of emissions measured in the Fleet sector of the inventory.
- **Energy Efficiency Projects:** Since 2019, Public Works upgraded 18,000 streetlights to more energy efficient LED fixtures and continued our history of regular energy efficiency improvements to our wastewater treatment systems. These projects reduced energy use and associated GHG emissions, while also saving the City more than $700,000 in energy costs annually. Projects are often developed in partnership with Clark Public Utilities and result in additional energy incentives to the City.
- **Telework Policies:** New work-from-home policies implemented during the pandemic, along with Commute Trip Reduction incentive programs, have reduced employee driving trips. Vehicle emissions also continue to trend downward due to federal fuel efficiency standards for new cars.
- **Decarbonization of the Electricity Grid:** Clark Public Utilities (CPU), following Washington's Clean Energy Transformation Act (CETA), is progressing toward its required transition to a carbon-neutral electricity supply by 2030. Cleaner electricity will help

drive down emissions from buildings, streetlights, and water and wastewater treatment over time.

- **Regional Population Growth:** The net increase in Water & Wastewater sector emissions is likely driven by increases in customers served by our municipal-owned utilities, which serve both residents of the City of Vancouver and neighboring unincorporated areas. Increased water demands community-wide will require increased energy usage by utilities to maintain high levels of service, and Water & Wastewater is expected to remain one of the City's largest emissions sectors.
- **Hotter/Colder Weather:** Without further analysis, we are unable to know how much effect to attribute to more frequent, extreme, and prolonged heat and winter storms, but we do expect that these weather events will have upward pressure on buildings-related emissions and fugitive emissions related to air conditioning refrigerants.

Next Steps

The local government operations emissions inventory points to a need for continued investment in infrastructure, staff capacity, and capital projects that have longer planning horizons to accelerate our progress toward interim targets at a leading-edge pace. The City must continue to make progress in every sector, while also prioritizing equipment transitions to electricity sources to ensure municipal operations are on a downward trajectory as the electricity grid is decarbonized.



Conclusion

The 2023 GHG Inventory marks the City's first assessment of the measurable impacts of its early climate action efforts after one year of work under the Climate Action Framework. Significant progress has been made to reduce emissions from municipal operations, and foundational policies are underway to mitigate the expected rise in community emissions.

This inventory shows that buildings as well as communitywide transportation patterns will be particularly important to focus on, which will require widespread partnership with private citizens and businesses, as well as strong policies to prioritize emissions-reducing strategies where the City has significant and direct influence. On the municipal side, reducing energy use wherever possible and transitioning to electric equipment will position the City to take the greatest advantage of the benefits of grid decarbonization.

It is also important to note that the City's greenhouse gas inventory reporting process does not reflect all priorities outlined in the Climate Action Framework nor all actions underway to adapt to and mitigate against climate change in our community and municipal operations. For example, natural systems are key to building and sustaining community and ecosystem resilience locally, but the impact of important programs implemented under the Climate Action Framework like Naturespaces and increased street tree planting by Urban Forestry are not directly represented in the GHG Inventory. As we work toward our emissions-based targets, these critical climate actions should not be overlooked or undervalued due to their absence from emissions accounting systems.

The City of Vancouver will continue to track key energy use and emissions indicators on an on-going basis, and data and methods will be improved over time to provide efficient and purposeful reporting. The next GHG inventory will be completed for the year 2027 to assess progress resulting from actions implemented in the coming years.

Appendix A: Methodology Details

The following tables shows each activity, related data sources, and notes on data gaps.

Energy

This inventory includes electricity and natural gas for the building sectors. Other sources that may be present in the community but are not accounted for include non-utility fuels (e.g. wood or oil heat) and other fuels used in industrial processes.

Table 3: Energy Data Sources

Activity	Data Source	Data Gaps/Assumptions
Communitywide		
Residential, commercial, and industrial electricity consumption	Clark Public Utilities	Electricity usage for customers within the City of Vancouver is reported by sector.
Residential, commercial, and industrial natural gas consumption	Northwest Natural	Weather-normalized natural gas loads for customers within the City of Vancouver are reported by sector. "Transportation" loads are included in the industrial sector.
Local Government Operations		
Electricity consumption	Clark Public Utilities (CPU)	Electricity usage is calculated from consolidated bills for all City accounts provided by CPU. Street Lights electricity is based on one of the largest street lights accounts; other street lights and traffic lights are behind meters connected to building accounts and cannot be separated out from building totals.
Natural gas consumption	Northwest Natural (NWN)	Natural gas loads for all City accounts are provided by NWN.

Table 4: Emissions Factors for Electricity Consumption

Year	CO_2 (lbs/MWh)	CH_4 (lbs/GWh)	N_2O (lbs/GWh)
2022	310.6971	7.71	0.89

Transportation

Table 5: Transportation Data Sources

Activity	Data Source	Data Gaps/Assumptions
Communitywide		
On-road vehicle miles travelled	Google Environmental Insights Explorer (EIE)	Google EIE provides origin and destination data based on cell phone location services. VMT attributed to this inventory includes 50% of inbound, 50% of outbound, and 100% of in-boundary VMT. Inventory does not account for electric vehicle adoption.
Off-road vehicles	US EPA National Emissions Inventory (NEI)	Population is used to scale county-level data from NEI to represent non-road equipment in the City of Vancouver.
Transit ridership	C-TRAN	Total VMT and fuels are reported by C-TRAN and scaled using C-TRAN ridership data on total passenger boardings vs. boardings in Vancouver.
Air travel	City of Portland, Port of Portland	Data provided by City of Portland on estimated actual emissions for flights leaving PDX to their first destination in 2022 is scaled using percent of travelers from Vancouver ZIP codes provided by Port of Portland traveler surveys.
Local Government Operations		
Government vehicle fleet	Fleet Services	Data is tracked and reported using Fleet management software.
Employee commute	WSDOT Commute Trip Reduction (CTR) Employee Commute Survey (City Hall)	City Hall employee commute surveys are used as the basis for commute mode split and scaled to represent the entire employee population. This likely underreports emissions in this sector. As other City facility locations are surveyed, this method will be improved.

For vehicle transportation, it is necessary to apply average miles per gallon and emissions factors for CH4 and N2O to each vehicle type. National default emissions factors are utilized for all vehicle types (see Table 6) except transit vehicle fuel economy where provided by C-TRAN.

Table 6: MPG and Emissions Factors by Vehicle Type

Fuel	Vehicle type	MPG	CH_4 g/mile	N_2O g/mile
Gasoline	Passenger car	25.3	0.0084	0.0069

Gasoline	Light truck	18.2	0.0117	0.0087
Gasoline	Heavy truck	5.383557	0.0719	0.0611
Gasoline	Motorcycle	44	0.0084	0.0069
Diesel	Passenger car	25.3	0.0005	0.0010
Diesel	Light truck	18.2	0.0010	0.0015
Diesel	Heavy truck	6.561615	0.0051	0.0048

Water & Wastewater Treatment

Table 7: Water & Wastewater Data Sources

Activity	Data Source	Data Gaps/Assumptions
Communitywide & Local Government Operations		
Nitrogen Discharge	Wastewater Utility	In the community-wide inventory, wastewater volume of water treated and population served is scaled to City of Vancouver customers, whereas emissions related to treating water for the full service territory are accounted for in the local government inventory. A default multiplier is used for industrial commercia discharge.
Biosolids Combustion	Wastewater Utility	Metric tons and energy content of biosolids is reported by the utility.
Energy used in wastewater treatment facilities	Wastewater Utility	Annual electricity use for treatment processes, natural gas loads for the incinerator, and diesel consumption are reported by the utility.
Energy used in potable water treatment	Water Utility	Annual electricity use for treatment processes is reported by the utility.

Solid Waste

This inventory includes total landfill waste generated by the community and sent to Finley Butte Landfill in Boardman, Ore. The waste mix characterization is based on the Department of Ecology 2020-21 Waste Characterization Study. Composting is not calculated separately for community or government operations, but estimates of organics are included in the waste characterization.

Table 8: Solid Waste Data Sources

Activity	Data Source	Data Gaps/Assumptions

Communitywide		
Landfilled solid waste	Solid Waste Department	Includes residential, commercial, and industrial solid waste collected by Waste Connections.
Local Government Operations		
Landfilled solid waste	Solid Waste Department	Includes waste generated at City of Vancouver government facilities and ash and other special waste from the wastewater treatment facility.

Fugitive Emissions & Upstream Impacts

Table 9: Fugitive Emissions & Upstream Impacts Data Sources

Activity	Data Source	Data Gaps/Assumptions
Communitywide		
Natural gas distribution	ICLEI	National defaults are used for leakage rate and emissions factors for natural gas, which is applied to total therms of natural gas used community-wide.
HFCs & PFCs	US EPA Inventory of U.S. GHG Emissions and Sinks 1990-2022	Estimates were made using national data for HFCs and PFCs and scaling it using population to attribute emissions for the City of Vancouver.
Electric Power Transmission Losses	EPA Emissions & Generation Resource Integrated Database (eGRID)	Western Grid Gross Loss Rate for 2022 is used to estimate transmission losses for communitywide electricity usage.
Local Government Operations		
Natural gas distribution	ICLEI	National defaults are used for leakage rate and emissions factors for natural gas, which is applied to total therms of natural gas used at City facilities.
HFCs	General Services Department	Quantity of HFC-410a refrigerant used in City facilities is tracked by General Services.

Inventory Calculations

The 2023 inventory was calculated following the US Community Protocol and ICLEI's ClearPath software. As discussed in Inventory Methodology, the IPCC 5th Assessment was used for global warming potential (GWP) values to convert methane and nitrous oxide to CO2 equivalent units. ClearPath's inventory calculators allow for input of the sector activity (i.e. kWh or VMT) and emission factor to calculate the final CO2e emissions.

Appendix B: Adjusted 2019 GHG Inventory

Over time, available data sources and best practices for greenhouse gas accounting can change and improve, which may result in discrepancies between inventories. Some jurisdictions update data from all past inventory years when methodologies change. Others keep past inventory methods intact, recognizing that year-over-year comparisons will not be usable as direct comparisons.

In developing the 2023 GHG Inventory, some updates were made to data inputs, emissions factors, activities included, and to correct for errors. To maintain methodological consistency, improvements made for the 2023 GHG Inventory were also carried over to 2019 data for comparison purposes. The Adjusted 2019 GHG Inventory data used for analysis is presented below in Tables 11 and 12.

These adjustments increased overall emissions reported for 2019 in both the Community-wide and Government Operations inventories by 8% and 28%, respectively, shifting back the trajectory toward our first interim targets, which can be seen in Table 10.

Table 10: Differences between originally reported 2019 emissions and 2019 adjusted

	Originally Reported		2019 Adjusted (Used in 2023 Inventory Report)	
Inventory	**Originally reported total emissions**	**Reduction relative to 2007 baseline**	**Adjusted total emissions**	**Reduction relative to 2007 baseline**
Community-wide Emissions	1,627,037 $MTCO_2e$	-19%	**1,763,768 $MTCO_2e$**	**-12%**
Government Operations Emissions	16,223 $MTCO_2e$	-61%	**20,706 $MTCO_2e$**	**-50%**

In the Community-wide Inventory, increased emissions were primarily driven by the change to a new data source for vehicle miles traveled (VMT) to improve accuracy. Previously, a projected value based on a 2015 model had been used to estimate 2019 VMT, and that method could not be recreated for 2023. Instead, both inventories were updated using origin and destination data based on cell phone location services available through Google Environmental Insights Explorer. This tool provides high-quality data annually for our jurisdiction and will provide a more accurate and consistent data source into the future that is representative of the on-road travel we can influence. This tool is vetted and recommended by ICLEI.

Increases in reported municipal emissions were primarily driven by the addition of wastewater treatment process activities identified as missing by the ICLEI Quality Assurance/Quality Control team. Calculators for process N2O emissions from wastewater treatment and effluent discharge to rivers, as well as combustion of biosolids from the wastewater solids incinerator at the Westside treatment plant, contributed an additional 2,620 $MTCO_2e$ to the adjusted 2019 Municipal Inventory. Smaller increases and decreases in 2019 emissions also resulted from new data inputs for buildings and street lights electricity usage and fleet vehicles. In both cases, reports pulled for the original 2019 inventory were not able to be recreated and new data was pulled for both inventory years to maintain consistency.

Additionally, in the Municipal Inventory, changes were made to how water and wastewater emissions are allocated, which increased the representation of Water & Wastewater Treatment in the inventory results but did not change overall municipal emissions totals (see Figures 8 and 9). Previously, all electricity-related emissions from water and wastewater treatment and distribution were allocated under the Buildings & Facilities sector. Separating these emissions out from other types of government buildings and facilities allows the City to better define and prioritize strategies and resources based on the types of activities driving emissions.

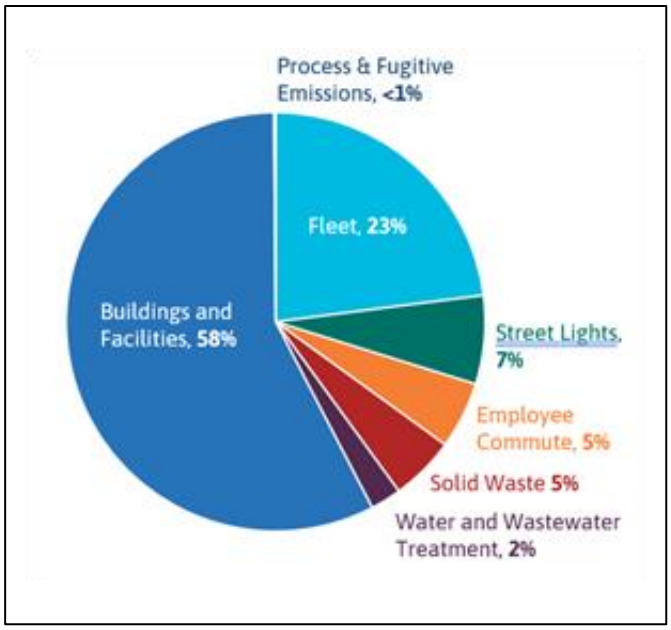

Figure 8: Original 2019 Reported Government Operations Emissions by Sector

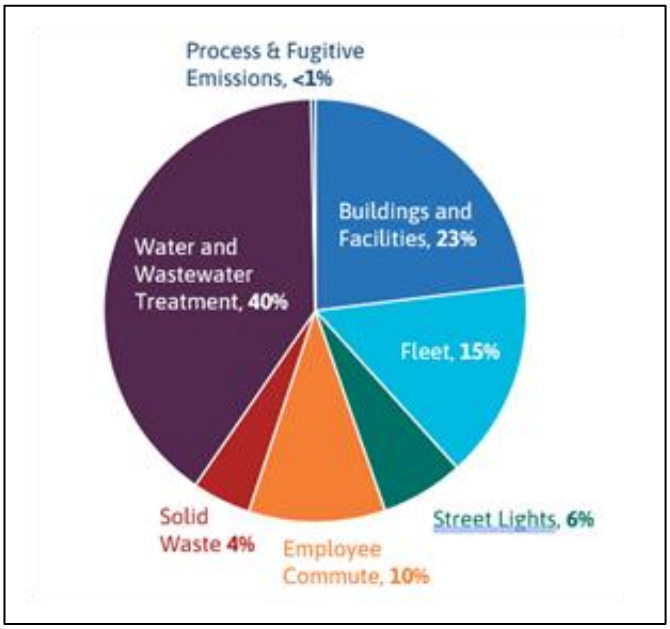

Figure 9: Adjusted 2019 Government Operations Emissions by Sector

As greenhouse gas inventory best practices evolve and data sources improve over time, changes to our methodologies and overall rate of progress-to-goal are expected. As stewards of these data, the City is responsible to maintain the most accurate accounting in order to inform programmatic investments. Both the 2019 and 2023 GHG inventories are based on the best available science for greenhouse gas accounting by local governments, and City Climate Program staff will continue to improve these data and methods in future years to provide efficient and purposeful reporting of emissions for decision making and public transparency.

Table 11: Communitywide Emissions Inventory (2019 Adjusted)

Sector	Fuel or source	2019 Usage	Usage unit	2019 Emissions ($MTCO_2e$)
Residential Energy	Electricity (Clark Public Utilities)	849,728,564	kWh	132,277
	Natural gas (Northwest Natural)	16,939,928	Therms	90,097
Residential Energy total				**222,374**
Commercial Energy	Electricity (Clark Public Utilities)	780,129,152	kWh	121,442
	Natural gas (Northwest Natural)	13,974,309	Therms	74,325
Commercial Energy total				**195,767**
Industrial Energy	Electricity (Clark Public Utilities)	367,445,960	kWh	57,200
	Natural gas (Northwest Natural)	4,399,622	Therms	23,351
Industrial Energy total				**80,551**
On-Road Transportation	Gasoline (passenger vehicles)	1,110,039,495	VMT	461,178
	Diesel (passenger and freight)	113,818,824	VMT	167,554
Transit	Diesel	4,655,032	VMT	7,926
	Gasoline	60,030	VMT	75
Aviation	Aviation Gasoline			403,489
Off-Road	Diesel			36,210
	Gasoline			18,546
	LPG			421
	CNG			247
Marine (Freight)	Diesel	72,620	MMBtu	2,189
Rail (Freight)	Diesel	29,608	MMBtu	5,371
Transportation total				**1,103,206**
Solid Waste	Waste Generated	116,943	Tons	26,373
Solid Waste total				**26,373**
Water and Wastewater	Water Treatment Energy Usage	19,614,585	kWh	3,053
	Wastewater Treatment Energy Usage	14,763,395 3,590	kWh Therms	2,317
	Wastewater Treatment	5,427	million gal/yr	193
	Nitrogen Discharge	1,063	kg N/day	808
	Combustion of Biosolids	18	MT/day	1,570
Water and Wastewater total				**7,941**
Process & Fugitive Emissions	Fugitive Emissions from Natural Gas Distribution			6,127
	Process Emissions from Refrigerant Use (HFCs and PFCs)			106,248
Process & Fugitive total				**112,375**
Upstream Impacts of Activities	Electric Power Transmission Losses			15,181
Upstream Impacts total				**15,181**
Total community-wide emissions in 2019				**1,763,768**

Table 12: Local Government Operations Inventory (2019 Adjusted)

Sector	Fuel or source	2019 Usage	Usage unit	2019 Emissions ($MTCO_2e$)
Buildings & Facilities	Electricity	21,928,099	kWh	3,414
	Natural Gas	256,492	Therms	1,364
Buildings & Facilities total				**4,778**
Street Lights	Electricity	8,433,374	kWh	1,313
Street Lights total				**1,313**
Vehicle Fleet	Gasoline (on-road)	2,828,043	VMT	1,938
	Diesel (on-road)	117,811	gal	1,143
	Gasoline (off-road)	2,990	gal	26
	Diesel (off-road)	4,260	gal	44
	Propane (off-road)	320	gal	2
Vehicle Fleet total				**3,153**
Employee Commute	Gasoline	4,713,795	VMT	1,870
	Diesel	473,508	VMT	274
	Transit	384,679	VMT	22
Employee Commute total				**2,166**
Solid Waste	Waste Generation	4,445	Tons	930
Solid Waste total				**930**
Water & Wastewater	Water Treatment Energy Usage	19,614,585	kWh	3,053
	Wastewater Energy – Electricity	14,763,395	kWh	2,298
	Wastewater Energy – Natural Gas	3,590	Therms	19
	Wastewater Energy – Diesel	30,037	gal	309
	Wastewater Treatment	5,427	million gal/yr	242
	Nitrogen Discharge	1,063	kg N/day	808
	Combustion of Biosolids	18	MT/day	1,570
Water & Wastewater total				**8,299**
Process & Fugitive Emissions	Fugitive Emissions from Natural Gas Distribution			45
	Process Emissions from Refrigerant Use (HFCs)			22
Process & Fugitive Emissions total				**67**
Total government emissions in 2019				**20,706**

Table 13 provides a list of updates that were made to the 2019 GHG Inventory during the development of the 2023 GHG Inventory to align methodologies.

Table 13: Updates to the 2019 GHG Inventory

Sector	Data/Methods Updated
Community-wide Inventory	
Transportation	New data inputs: VMT data updated to accurately compare to 2023. Corrections: Scaling factor for marine and rail emissions updated for accuracy; corrected local attribution of emissions from Pearson Field Airport.
Solid Waste	Corrections: Landfill characteristics updated for location in Eastern Oregon.
Upstream Impacts	Corrections: Formula to calculate electric power transmission losses updated for accuracy.
Municipal Operations Inventory	
Buildings & Facilities; Street Lights	New data inputs: Electricity usage data updated to parallel reports pulled in 2023.
Vehicle Fleet	New data inputs: Data for on-road gasoline and on-road diesel vehicles updated to parallel reports pulled in 2023. Correction: Percent biofuel in fuel blends updated for accuracy.
Solid Waste	Updated methodology: An improved calculator in ClearPath was used to account for landfill characteristics and align with 2023.
Water & Wastewater	Updated methodology: Added three missing calculators for wastewater treatment emissions, effluent discharge, and combustion of biosolids.
Process & Fugitive Emissions	Updated methodology: Added missing calculator for fugitive emissions from natural gas distribution attributed to natural gas usage by municipal operations.
Electricity Grid Emissions Factors	Correction: Emissions factors for grid electricity were updated for accuracy. This change impacts multiple sectors across both inventories.

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Memorandum

To: Rebecca Kennedy, City of Vancouver (COV)

From: Nicole McDermott, WSP; Sam Rubin, WSP; and Tyler Bump, ECOnorthwest

CC: Bryan Snodgrass, COV; and Chim Chune Ko, COV

Subject: Market and Land Capacity Analysis Methodology and Process for the Preferred Alternative

Date: February 9, 2025

Introduction

This memorandum (memo) outlines the methodology for modeling the estimated housing and employment capacities for the Preferred Alternative studied in the OUR VANCOUVER Comprehensive Plan Update State Environmental Policy Act Final Environmental Impact Statement (FEIS). This methodology memo serves as an addendum to the previously issued methodology memo issued for the Draft Environmental Impact Statement (DEIS), which included analysis of Alternative 1, Alternative 2, and the No Action Alternative. This Preferred Alternative represents the proposed future land use and zoning map for the Comprehensive Plan Update and informs future infrastructure and capital facilities planning required as part of the Comprehensive Plan. This memo follows the same outline as the previous methodology memo but includes additional sections where additional analysis was conducted.

This memo is divided into the following five sections that outline the process for modeling estimated housing and job capacity:

1. Prototype Development and Map Creation: details the creation of the Preferred Alternative.
2. Land Capacity Analysis Deductions (Preferred Alternative): covers the assumptions made for the initial land use capacity analysis and acreage deductions for the Preferred Alternative.
3. Housing Feasibility Analysis: describes the process for modeling the number of new housing units that the Preferred Alternative has the capacity to support.

4. Parcel-Level Modeling of Housing and Job Capacity (Action Alternatives): describes the process of modeling the number of housing units and jobs that the Preferred Alternative has the capacity to support.
5. Model Outputs for Housing and Jobs Capacity: summarizes the housing and jobs capacity numbers used in the FEIS analysis.

1. Prototype Development and Map Creation

The Comprehensive Plan Update proposes to rename and simplify the current land use designations and associated zoning codes to focus on 10 zoning districts:

- Low Scale Neighborhood (LSN)
- Medium Scale Neighborhood (MSN)
- Mixed Use Neighborhood (MU)
- Manufactured Home (MH)
- Regional Activity Center (RAC)
- Institutional/Campus (IC)
- Industrial/Employment (IE)
- Heavy Industrial (HI)
- Parks (POS)
- Natural Areas (NA)

Five of the eight zoning districts (LSN, MSN, MU, RAC, and IC) developed for the Comprehensive Plan Update would allow for a mix of employment and housing types at varying scales and densities. For example, the MSN zoning district would allow housing prototypes with a higher density than single-family housing, but a lower density than podium or tower developments allowed in MU and RAC zoning districts. The Manufactured Home zone is applied to existing mobile home parks in Vancouver and does not permit redevelopment except for in limited cases to comply with HB 1220 and requirements to allow permanent supportive housing and emergency shelters in all zones that allow housing or hotels. The HI, IE, POS, and NA zones do not allow housing development.

Analysts used the steps described below to develop the Preferred Alternative for the FEIS.

Preferred Alternative Development Steps:

1. Develop Prototypes: EcoNorthwest created eighteen housing prototypes that are likely to develop in Vancouver (see Table 1). Prototypes reflect current development trends within the city and the potential for different housing types based on recent

changes in state legislation. The prototypes cover a variety of housing types from single-family homes and four-story walk-ups to towers and podiums. Each prototype has an estimated dwelling-units-per-acre (DUA) value. Prototype allowances were updated for the Preferred Alternative to reflect updated zoning language and density allowances.

2. **Assign Prototypes to Zoning Districts:** Housing prototypes that were identified are those most likely to occur in the different zoning districts that will allow housing (LSN, MSN, MU, RAC, and IC). See Table 1**Error! Reference source not found.**.

   Note: No housing prototypes were identified in IE, HI, MH, POS, or NA because no housing will be allowed.

3. **Prepare Preferred Land Use Alternative:** Finalized Preferred Alternative Map that shows zoning districts throughout the city. This step was developed over many iterations and was prepared with multiple rounds of review with community partners, city staff, the planning commission, and city council.

   Refinement of the alternatives was informed by comments on the DEIS, extensive public input, best planning practices, existing city council policy guidance, existing and planned enhanced transit corridors, locations of parks/open space and schools, and locations of growth nodes/corridors/centers.

Table 1. Housing Prototypes by Zone

Housing Prototypes	Dwelling Units Per Acre	Manufactured Home Park*	Low-Scale Neighborhood	Medium-Scale Neighborhood	Mixed-Use Neighborhood	Regional Activity Center	Institutional/ Campus	Industrial/ Employment*	Heavy Industrial*	Parks/Open Space/ Natural Areas*
Single Family	7.3									
Duplex (side by side)	14.5									
Duplex (stacked)	14.5									
3 Townhouses	21.8									
Quadplex	28.5									
4 Townhouses	29.0									
Sixplex	43.0									
6 Townhouses	43.6									
Cottage Cluster	29.0									
Courtyard (attached)	28.5									
Small Single Stair	58.1									
Small Multiunit	43.6									
Small Multiunit (taller)	58.1									
Medium Multiunit	34.8									
Medium Multiunit (taller)	52.3									
3-story wood frame	65.3									
4-story wood frame	84.4									
Podium	152.5									
Tower	217.8									
Microunits 1	273.8									
Microunits 2	342.3									

*No housing prototypes are allowed

2. Land Capacity Analysis Deductions (Preferred Alternative)

Table 2 identifies the deductions used in the land capacity analysis model for the Preferred Alternative. As noted in the table, some deductions are different in the housing capacity analysis, which estimates the capacity for new housing units, compared to the employment capacity analysis, which estimates the capacity for new jobs. Table 2 also identifies different deductions for the land categories (Vacant, Underutilized, and Built) included in the Clark County Vacant Buildable Lands Model (VBLM).[1]

[1] The parcel dataset used in the model is the 2022 Clark County Vacant Buildable Lands Model (VBLM) data output.

Table 2. Deductions

Deduction	Zoning District						
	LSN	MSN	MU	RAC	IC	IE	HI
Land Use Split per Zoning Districts[a]							
Residential	95%	90%	65%	60%	25 %	0%	0%
Employment[b]	5%	10%	35%	40%	75 %	100%	100 %
Critical Areas/Constrained Land Deductions							
Residential Capacity Analysis	50% of constrained lands are assumed to not develop.					N/A	
Employment Capacity Analysis	20% of Vacant and Underutilized constrained lands will not develop. 50% of Built constrained lands will not redevelop.						
Infrastructure Deduction							
Residential Capacity Analysis	31.5%					N/A	
Employment Capacity Analysis	31.5%					12.5%[d]	25%
Market Factor and Redevelopment Rate							
Residential Capacity Analysis	N/A (embedded in market feasibility analysis, see Section 3).						
Employment Capacity Analysis Market Factor	10% of Vacant and Underutilized lands will not develop given market conditions.						
Employment Capacity Analysis Redevelopment Rate (only applies to Build land)[e]	0%		12.8%	27.4%	0%		
Job loss deduction[f]			13 jobs/net acre				
Small Parcels, Easements, and Tax Value							
Exclude small parcels less than 1,000 SF	Applies to all zoning districts.						
Exclude roads and easements	Applies to all zoning districts.						
Exclude parcels given a zero value in Clark County's VBLM output[g]	Applies to all zoning districts.						

Notes:

(a) The residential/non-residential splits are model assumptions based on likely development trends for new zoning districts. These are not intended to reflect future codified requirements.

(b) Employment represents any non-residential use that is assumed to produce jobs instead of housing units.

(c) Critical areas/constrained lands were identified per the 2022 Clark County VBLM dataset

(d) Infrastructure deductions for IE are lower than the 25% used in the 2022 Clark County VBLM for Industrial to account for the more urban context in Vancouver.

(e) Redevelopment from employment uses to different employment uses in Low Scale Neighborhood (LSN), Medium Scale Neighborhood (MSN), Institutional/Campus (IC), and Industrial/Employment (IE) zones is unlikely and, therefore, no redevelopment rate is assumed for these zoning districts. However, an "intensification or refill" factor is applied to IE and Heavy Industrial (HI) zoning districts to establish the employment need (see Section 4 for details on the intensification factor). Redevelopment rates for Mixed Use Neighborhood (MU) and Regional Activity Center (RAC) were calculated by determining the feasibility of the four-story mixed-use prototype across all MU/RAC zones and its rate of feasibility.

(f) The job loss deduction applies to Built land in the MU and RAC zoning districts that is assumed to be redeveloped. This assumption accounts for a loss of existing jobs on the redeveloped parcels.

(g) The county assessor will flag a property as zero-value if appraisers determine the legally created tax lot does not have market value or is deemed exempt from taxes.

Key: HI = Heavy Industrial; IC = Institutional/Campus; IE = Industrial/Employment; LSN = Low Scale Neighborhood; MSN = Medium Scale Neighborhood; MU = Mixed Use Neighborhood; N/A = not applicable; RAC = Regional Activity Center; SF = square feet; VBLM = Vacant Buildable Lands Model

3. Housing Feasibility Analysis

The housing capacity analysis for the preferred alternative relies on a parcel-level feasibility analysis. The feasibility analysis examined the zoning district for each parcel, which prototypes are assumed to be allowed by future zoning, and which prototype is the most feasible option based on market conditions and available assessors' data.

Generally, the feasibility analysis examined the following factors:

- Total value per square foot of each parcel, which is equal to the total market value (land and buildings) divided by assessed acres.
- Price per square foot required to develop each building prototype.

If the total value per square foot is less than the prototype price to develop, then the prototype is considered feasible.

The feasibility analysis identified which prototypes would be considered feasible from a market perspective, which can result in multiple prototypes being viable. The model for the Preferred Alternative assigns the prototype that is considered the most feasible, or the prototype that is the most likely to develop because it is the most affordable to develop. Ultimately, this process looks at every parcel across the city and models the potential for a property to develop/redevelop. Only parcels identified as feasible with a corresponding prototype are included in the capacity analysis in Step 4 below. An overview of the feasibility analysis is included as Attachment .

4. Parcel-Level Modeling of Housing and Job Capacity (Action Alternatives)

Once the feasibility analysis (Section 3) was complete, analysts modeled housing and job capacity for the preferred alternative, applying the assumptions identified in Table 1. The following subsections identify the modeling process for the housing capacity analysis and job capacity analysis. A detailed process of this section is included as Attachment .

Housing Capacity Analysis

The first step in the housing capacity analysis model applied the deductions for critical areas, infrastructure, and residential versus employment allocation at the parcel level (see Table 2). The model then removed parcel fragments (1,000 square feet or smaller), roads/easements, and zero-value parcels.

Once all land reductions were applied, the model used the remaining net acreage to apply housing densities based on the most feasible prototype per the feasibility analysis (see Section 3). If a parcel was not determined to have a feasible prototype, then housing density was not applied to the parcel.

Housing Unit Yield Equation

Gross Acreage of a parcel – land reductions = net acreage

Net acreage X DUA (prototype DUA) = housing unit output per parcel

Post-Processing Deductions

Homeowner Association Deduction

The City sampled properties in different subdivisions across Vancouver to determine the possible existence of a homeowner association (HOA) that might limit densification or redevelopment potential. Then, using property titles obtained through a title company, analysts reviewed language in homeowner association bylaws to identify which areas may have language that could restrict the implementation of Washington State House Bill (HB) 1110. HOAs that had some degree of restrictive language were identified and the redevelopment capacity that was modeled in those areas was reduced by 70%. The 70% housing capacity reduction assumes that some of the redevelopment potential of parcels within HOAs with restrictive language would not occur because of a lack of enforcement of HOA policies. At the time of this analysis in early 2026, HB 1110 does not include retroactive application to pre-existing governing documents adopted by HOAs.

Master Plan Deduction

In areas where the city has adopted Master Plans or approved Development Agreements (DAs), the housing units and jobs projected in those documents was used instead of the model output. This requires an override where the existing master plan geography is allocated the projected number of housing units and/or jobs identified in the adopted plan or DA. At the time of this analysis in early 2026, the following master plan or DAs were identified:

- Vancouver Heights
- Vancouver Innovation Center
- Columbia Palisades
- Section 30
- Waterfront
- HQ Vancouver

Existing Unit Deduction

Clark County assessor data was used to identify the number of existing units on lots that include feasible housing development per the feasibility analysis. Existing units were then deducted to avoid double counting the total number of units per lot.

Model Output

Total number of housing units assumed in the preferred alternative based on market feasibility, land capacity, and HOA, Master Plan or DA, and existing unit adjustments. These housing unit numbers are used for the Preferred Alternative in the FEIS analysis.

Employment Capacity Analysis

The employment capacity analysis was similar to the housing analysis, but as identified in Table 2, some of the model assumptions were different. Additionally, the employment capacity analysis did not use the feasibility analysis to determine redevelopment potential, but instead applied a redevelopment rate, as noted in Table 2.

Employment Target

An additional step in the employment capacity analysis was the establishment of an employment target that accounts for "work-from-home" jobs and "intensification" or "refill," which relates to a percentage of new jobs occurring within existing employment space through an intensification of the number of jobs per square foot. These two factors reduce the amount of land needed to support anticipated job growth and are an important consideration when determining whether the employment capacity of an alternative will meet the anticipated employment growth. At a summary level, the process for determining the employment target was as follows:

- Start with the anticipated employment growth of 43,198 jobs, as detailed in the Economic Opportunity Analysis.
- Separate potential job growth by industry sector based on two-digit North American Industry Classification System (NAICS) codes and assign jobs/NAICS codes to zoning districts.
- Apply a 13% deduction for "work from home" to all job sectors except transportation, food/services, manufacturing, and construction.[2]
- Apply a 23% deduction for jobs in HI and IE zoning districts because these districts may see an intensification of jobs within existing heavy industrial or employment developments. This means more jobs per acre may be produced in the future on heavy industrial or employment lands than currently exists, and a reduction is applied to the employment target because additional land would not be needed to support these jobs.[3]

This process resulted in a net employment need of 38,792, which reflects the number of new jobs that will need to be supported within the land capacity of the Preferred Alternative. The deductions above account for new jobs that could be accommodated within existing developments or from work from home and therefore, additional land capacity is not needed for those jobs.

Employment Land Capacity Analysis

Similar to the housing capacity analysis, the employment capacity analysis was conducted at the parcel level. The first step in the employment capacity analysis model applied the deductions for critical areas, infrastructure, and residential versus employment allocation, as identified in Table 2. The model then applied the market factor for Vacant and Underutilized land and redevelopment rate for Built land, as detailed in Table 2. *Note: the redevelopment rate does not apply consistently across the zoning districts.*

Once all the land reductions were applied, the model applied the employment densities (jobs per acre) listed below for each zoning district.[4]

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[2] Work-from-home deduction is based on 2023 American Community Survey estimates, table B038601, work from home percentage for Vancouver. Clark County is at 21.8% per the same data.

[3] The intensification factor is based on data from Portland vetted with industrial stakeholders as part of Portland's EOA (Economic Opportunity Analysis)Industrial Land Committee process. Longitudinal point-level Quarterly Census of Employment Wage data for Vancouver are not available. Intensification is essentially "refill," indicating an amount of land that will intensify in job density.

[4] The employment densities are based on recent development trends in similar contexts and professional judgment.

- LSN: 6
- MSN: 6
- MU: 48
- IC: 46
- RAC: 54
- IE: 30
- HI: 9

The final step in the employment capacity analysis is intended to avoid double counting existing jobs when a property is assumed to redevelop. Washington Employment Security Department Quarterly Census of Employment Wage data was used to determine the average jobs per acre within future MU and RAC zoning districts. Only the MU and RAC zoning districts were used because those are the only zones where a redevelopment rate is applied (see Table 3 footnotes for additional details). The average number of jobs per acre was estimated at 13, which was applied as a deduction to the output of jobs on built parcels in MU and RAC zoning districts.

Employment Yield Equation:

Gross Acreage of a parcel – land reductions X market factor/redevelopment rates = net acreage

Net acreage X jobs/acre – 13 jobs/acre on Built Mixed Use Neighborhood and RAC parcels = jobs output per parcel

Model Output: Total number of jobs assumed in the preferred alternative based on vacancy status and redevelopment potential.

5. Model Outputs for Housing and Jobs Capacity

Table 3 below shows the model output for the DEIS action alternatives, the No Action Alternative, and the Preferred Alternative.

Table 3. Model Outputs for Housing Yields and Employment Yields

Alternative (City Only)	Methodology	Housing Yields	Employment Yields
No Action	Clark County VBLM (refer to DEIS methodology memo)	29,600 units	16,600 jobs
Alternative 1	Feasibility/Redevelopment potential (refer to DEIS methodology memo)	45,100 units	46,000 jobs
Alternative 2	Feasibility/ Redevelopment potential (refer to DEIS methodology memo)	50,696 units	49,300 jobs
Preferred Alternative	Feasibility/Redevelopment Potential (Refer to Section 4)	44,111 units	45,145 jobs

Key: VBLM = Vacant Buildable Lands Model

Attachment 1

Feasibility Analysis Overview

Attachment 2

Land Capacity Analysis Process

DATE:	May 27th, 2025
TO:	Nicole McDermott and Sam Rubin, WSP
FROM:	Tyler Bump and Michelle Anderson, ECOnorthwest
SUBJECT:	Vancouver Comp Plan Update – Market Feasible Capacity Analysis

Overview

WSP partnered with ECOnorthwest to assess the potential housing capacity for two different EIS alternatives for the comprehensive plan update for the City of Vancouver. ECOnorthwest worked with WSP to complete this analysis, referred to as the *market-feasible housing capacity,* given the potential land use intensities of the different place types of the alternatives. The difference between the alternatives was the place type designated to each parcel, which could result in different citywide totals for market-feasible housing capacity.

For the capacity analysis, ECOnorthwest completed a financial analysis that models a developer's decision-making process and cash flow equation. We created pro forma models to test the financial feasibility of various housing densities that might be allowed in different place types. We estimated the market feasible capacity of multiple prototypical developments, or *housing prototypes*. These prototypes reflect theoretical development profiles that could potentially comply with proposed zoning standards to understand what the market was most likely to deliver if zoning was a constraint.

Why is development feasibility and pro forma analysis important?

Development can be costly and risky. Getting funding to construct new development requires lenders and investors to be reasonably confident they will earn enough financial return to justify the risks and attract equity to a project.

Economic or market feasibility is generally assessed by comparing the expected revenues (home sales, net income from rents, room rates) against the costs of development. If a development is not feasible, it will not be built, contrary to a city's housing goals.

Approach

Prototypes and Assumptions

ECOnorthwest analyzed nearly 20 housing prototypes that were of various configurations and resulting densities, including general forms such as single-family, townhome, lowrise, garden-style, and midrise apartment developments. We based the prototypes on recent existing developments throughout the City of Vancouver as well as potential scales of housing that might be allowed in the future given legislative changes at the state level. Though the scale of development ranges substantially throughout the city, we developed approximate prototypes that could be possible in Vancouver.

We drew our initial market and construction cost insights from third-party sources such as the American Community Survey (ACS), Costar, Redfin, and Craftsman, and then vetted

those assumptions with local developers and brokers through various interviews. Though cost assumptions typically stay consistent throughout a city, we created a model to help differentiate the revenue assumptions (i.e., rent and sales prices) by census tract This model used rent and sales data from ACS, to interpolate what revenue assumptions might be for each census tract in the city.[1]

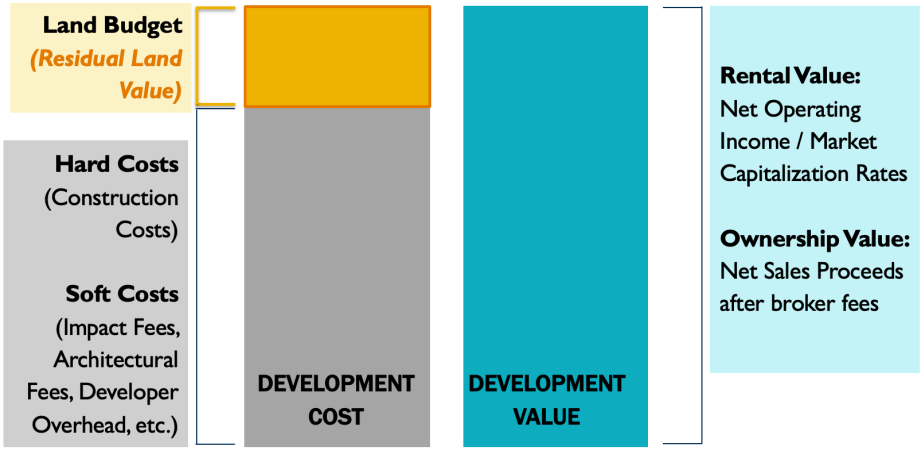
We then aligned similar block groups, based on rent and sales prices, into newly-defined market areas. We took those results and compared them to the city-wide average to understand how each market area related to the city-wide average (expressed as a ratio). We then applied that ratio as an input to each rent or sales price on a prototype level with the most up-to-date market data from CoStar and Redfin. This revenue model allowed us to refine our pro forma results spatially. The model therefore considered that different areas across Vancouver would have varying demand for different types of housing, which impacts the resulting feasibility of housing development.

Pro Forma Financial Analysis Methods

The pro forma model used a residual land value (RLV) metric to evaluate feasibility. RLV measures the land budget a developer would have to purchase land after accounting for potential development costs and revenues.

Exhibit 1: Example of Feasible Development using Residual Land Value (RLV) Model

Source: ECONorthwest



[1] ACS has two notable limitations we try and correct for: 1) there are many instances of tracts with missing (or "NA") estimates for rents, due to low rates of survey response or simply because there are no observations of a given type of apartment in that tract and 2) we often see unusually low rents because the ACS conflates market rate apartments with other structures like informal rental arrangements. We interpolated missing rent values by using an inverse-distance weighted average smoothing function, so that tracts with missing values take the average of their neighbors, ordered by proximity. We then cluster census tracts together into market areas (approximately 10 total areas) based on adjacency and similarity of rents and tenure splits.

Generally, if the RLV is equal to or above land prices in the potential development area, the development is considered feasible at market rate. If the RLV is zero dollars, the development could be feasible if land were donated for free. However, if the RLV is less than zero, the development is likely infeasible unless a developer receives additional subsidies or incentives, including free land. Results from this method describe a general analysis of prototypes and does not consider the many potential unique conditions that could be factors in development feasibility (e.g., increased predevelopment costs, low land basis from longtime land ownership). For these reasons, residual land value analyses should be thought of as a strong indicator of the relative likelihood of development, rather than an absolute measure of return to the investor or developer for any specific site.

In our feasibility analysis, we used key financial data like rent, operating costs, and development expenses for each prototype. To evaluate rental prototypes, we determined the leasable square footage, calculated revenue, deducted vacancy and operating costs (such as taxes, insurance, maintenance, management, select utilities) and arrived at the annual net operating income (NOI). For the ownership prototypes, we calculated gross sales price and subtracted commissions.

We calculated development costs by applying the cost per square foot values to different product types (e.g., residential, retail) and adding parking costs. We then summed those values to a total hard cost and calculated the soft cost, contingency, and developer fees to arrive at the total development cost.

To evaluate rental prototypes, we derived the value for each prototype by either dividing the NOI by a market-driven return on cost threshold (for higher-density prototypes) or by determining the loan capacity given debt service assumptions and NOI (for lower density prototypes). Return on cost is an important metric because it establishes the threshold where the potential returns offset project risks. Developers compete for capital in a market against other real estate and non-real estate investments. If return on cost is too low, a developer will not be about to attract capital, and the project will not move forward – this is most relevant for higher density prototypes that tend to attract institutional capital that is mobile across markets and investment products. We then summed those values to arrive at a total value for each prototype. We then calculated the land budget (the RLV) by subtracting the total development cost from the total value.

For lower-density rental prototypes, relating NOI to debt service requirements is more appropriate given that these projects are smaller and therefore tend not to attract institutional capital, but they are similar to larger projects in that debt is typically the largest source of funding for a project and if return requirements for debt can't be met, the development will not be able to attract the capital and the project won't move forward. For these prototypes, we solved for the land budget (the RLV) that was possible given the NOI on the project and potential terms, interest rates, and debt service coverage ratio

requirements. For the ownership prototype, we determined the land budget by subtracting total development costs from gross sales less commission and a spread on cost to account for profit.

For both rental and ownership prototypes we divided the total land budget by site square footage, arriving at a residual land value per square foot of land for each market area – this was the key variable for inclusion in the site specific analysis we conducted with the help of WSP.

Site-Specific Capacity Analysis

We delivered two key outputs for comparison to site-specific data and to finalize the market-feasible capacity analysis. For each prototype, we delivered both the calculated dwelling units per acre as well as the residual land value (RLV) per square foot of land for each market area. The units of these outputs (normalized by land area) allowed us to take the data and apply it to each site.

For each parcel, WSP and ECOnorthwest:

1. Exported a GIS csv with each parcel's market area, placetype, and key assessor data such as parcel area and total value (based on land and improvement value).
2. Calculated the total value per square foot of land (land + improvement value, divided by site area). This approach does not attempt to make adjustments to assessor's land value to values that are more reflective of real market value. We typically find that assessor data can lag behind market value. Therefore, this approach will result in an optimistic estimate of capacity
3. Subtracted total value per square foot of land from the RLV per square foot of each prototype for the corresponding market area to arrive at the remaining value.
4. Identified the feasible prototypes that were allowed by the placetype applied to the parcel – the prototype with remaining value greater than $0.
5. For parcels where the RLV was zero or negative (where the total value based on assessor data exceeded the RLVs of the allowed prototypes), the market-feasible capacity analysis resulted in no feasible housing prototype.

Land Use Model – Step-by-Step Process

The land use model for the Our Vancouver Comprehensive Plan was developed using Python in ArcGIS Pro. Instead of estimating land capacity based on broad citywide acreage, the analysis is conducted at the parcel level scenario, making it easier to show where housing and jobs are likely to be located across Vancouver. Housing and employment analyses are done separately, relying on the same data but with different assumptions about redevelopment, infrastructure, and critical areas.

1. Starting Datasets

- 2022 Vacant Buildable Lands Model (VBLM) dataset. Only parcels within the City of Vancouver are used in the land capacity analysis.
- Parcel-level feasibility analysis based on zoning. This analysis determines if a parcel is considered feasible for development and what prototype is most feasible by parcel.

2. Land Capacity Analysis

- Start with the 2022 VBLM dataset that has been updated to reflect the zoning or comprehensive plan designation assigned to the various alternatives.
- Apply filters to exclude land types **not eligible for development**:
    - **Infrastructure rights-of-way and easements**: roads, rail, utility corridors, etc.
    - **Public ownership exclusions**: parks and other tax-exempt lands unless redevelopment is anticipated. Coordination with the parks department is needed to update the inventory.
    - **Parcels below minimum size thresholds** or lacking infrastructure access may be excluded.
        - Parcels less than 1,000 square feet are excluded.
- **Split the remaining land by intended use**:
    - Allocate percentage of parcel acreage to either **residential or employment uses** (jobs/housing split) based on zoning.

        - From this point in the analysis, only the assigned acreage is used for either residential or employment analysis.

- Apply further deductions:
    - **Critical areas**: Critical areas identified by the County's VBLM process and are considered 'constrained' in the dataset.
        - Development in critical or constrained areas is limited. For housing analysis, lands in critical areas are counted at half their total area. For employment analysis, vacant or underutilized constrained lands are reduced by 20%, while built constrained lands are reduced by 50% in the calculation.
    - **Market factor for Employment**: proportion of land that will realistically be developed within the planning timeframe.
        - 10% of Vacant or Underutilized lands will not develop given market conditions. 10% reduction in total acreage by parcel is deducted.
    - **Redevelopment Rate for Employment:** 12.8% of lands zoned Mixed Use are anticipated to be redeveloped. 27.4% of lands zoned Regional Activity Center are anticipated to be redeveloped.
    - **Infrastructure:** proportion of land within a parcel that would be allocated for infrastructure placement.
        - 31.5% deduction in total acreage of a parcel for residential analysis
        - 31.5% deduction in total acreage of a parcel for employment analysis for all zones except Industrial/Employment (IE) and Heavy Industrial (HI). IE has a reduction of 12.5% and HI has a reduction of 25%.

3. Apply Density/Intensity Ratios

- Assign densities to each parcel based on their zoning. Density ratios are applied to the acreage remaining after deductions.
    - Residential: units per acre based on typology identified during feasibility analysis.
    - Employment: jobs per acre based on zoning.

4. Apply loss of existing jobs on redeveloped parcels

- The job loss deduction applies to Built (as determined by the Vacant Buildable Lands Model) land in the MU and RAC place types that are assumed to be redeveloped. This assumption accounts for a loss of existing jobs on the redeveloped parcels.
    - Reduce the number of jobs by parcel by 13 jobs/net acre.
- This analysis was done post-processing and is not included in the python notebook.

Housing Capacity Analysis (Python Notebook)

```
import arcpy
alt = "DatasetName"

new_field_name = "HousingYields"
new_field_type = "DOUBLE"

fields = [f.name for f in arcpy.ListFields(alt)]
if new_field_name not in fields:
   arcpy.AddField_management(alt, new_field_name, new_field_type)
   print(f"Field '{new_field_name}' added to {alt}.")
else:
   print(f"Field '{new_field_name}' already exists in {alt}.")

with arcpy.da.UpdateCursor(alt, ["HousingAcres", "DUAforPrototype", "GrossAcres",
"Constrained", "AlternativeZoning", new_field_name, "ExcludedParcels","VBLMStatus"]) as
cursor:
   for row in cursor:
      # First Deduction: Constrained vs nonConstrained land
      if row[3] == 0 or row[3] is None:
         row[0] = row[2]
      else:
         row[0] = row[2] * .5

         #filters
      if row[6] == "Road or Easement":
         row[0] = 0
      if row[2] < .022:
         row[0] = 0
      if row[7] == "Zero Value":
         row[0]= 0


      housing_yield = row[0]
      # 2nd Deduction: Development Assumption
      if row[4] == "LSN":
         housing_yield = housing_yield * .95
      elif row[4] == "MSN":
         housing_yield = housing_yield * .90
      elif row[4] == "MU":
         housing_yield = housing_yield * .65
      elif row[4] == "IC":
         housing_yield = housing_yield * .25
```

```
    elif row[4] == "RAC":
      housing_yield = housing_yield * .60
    elif row[4] == "IE":
      housing_yield = housing_yield * 0
    else:
      housing_yield = housing_yield * 0


    # 3rd Deduction: Infrastructure
    if row[4] == "LSN" or row[4] == "MSN":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "MU":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "IC":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "RAC":
      housing_yield = housing_yield - (housing_yield * .315)
    elif row[4] == "IE":
      housing_yield = housing_yield - (housing_yield * .315)
    else:
      housing_yield = 0

    # Housing Yields Estimate
    row[0] = housing_yield
    try:
      row[5] = housing_yield * row[1]
    except:
      row[5] = housing_yield * 0

    # Update the row
    cursor.updateRow(row)

print("Field values calculated and updated.")
```

Employment Capacity Analysis (Python Notebook)

```
import arcpy

alt = "LandUseAlt1_Scenario2"

new_field_name = "EmploymentAcres"
new_field_type = "DOUBLE"

new_field_name2 = "EmploymentYields"
new_field_type2 = "DOUBLE"

fields = [f.name for f in arcpy.ListFields(alt)]
if new_field_name2 not in fields:
  arcpy.AddField_management(alt, new_field_name2, new_field_type)
  print(f"Field '{new_field_name2}' added to {alt}.")
else:
  print(f"Field '{new_field_name2}' already exists in {alt}.")

fields = [f.name for f in arcpy.ListFields(alt)]
if new_field_name not in fields:
  arcpy.AddField_management(alt, new_field_name, new_field_type)
  print(f"Field '{new_field_name}' added to {alt}.")
else:
  print(f"Field '{new_field_name}' already exists in {alt}.")

with arcpy.da.UpdateCursor(alt, ["HousingAcres", "MaxDUA", "GrossAcres", "Constrined",
"AlternativeZoning", new_field_name, "Excluded",
"LandUseAlt2_VUGA_VBLM_Details_utilizatio", new_field_name2]) as cursor:
  for row in cursor:
    #VACANT
    if row[7] == "Vacant" or row[7]== "Underutilized":
      # First Deduction: Constrained vs nonConstrained land
      if row[3] == 0 or row[3] is None:
        row[5] = row[2]
      else:
        row[5] = row[2] * .8

      #filters
      if row[6] == "Road or Easement":
        row[5] = 0
      if row[2] < .022:
        row[5] = 0
      if row[7] == "Zero Value":
```

```
    row[0]= 0

employment_acres = row[5]
# 2nd Deduction: Employment land Splits
if row[4] == "LSN":
    employment_acres = employment_acres * .05
elif row[4] == "MSN":
    employment_acres = employment_acres * .1
elif row[4] == "MU":
    employment_acres = employment_acres * .35
elif row[4] == "IC":
    employment_acres = employment_acres * .75
elif row[4] == "RAC":
    employment_acres = employment_acres * .4
elif row[4] == "IE":
    employment_acres = employment_acres * 1
elif row[4] == "HI":
    employment_acres = employment_acres * 1
else:
    employment_acres = employment_acres * 0

# 3rd Deduction: market supply factor deduction
employment_acres = employment_acres - (employment_acres * .1)

# 4th Deduction: Infrastructure
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "MU":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "RAC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IE":
    employment_acres = employment_acres - (employment_acres * .125)
elif row[4] == "HI":
    employment_acres = employment_acres - (employment_acres * .25)

# Employment Acres estimate
row[5] = employment_acres

# 5th Deduction: Apply Job Density by placetype
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres * 6
```

```
    elif row[4] == "MU":
      employment_acres = employment_acres * 48
    elif row[4] == "IC":
      employment_acres = employment_acres * 46
    elif row[4] == "RAC":
      employment_acres = employment_acres * 54
    elif row[4] == "IE":
      employment_acres = employment_acres * 30
    elif row[4] == "HI":
      employment_acres = employment_acres * 9
    else:
      employment_acres = employment_acres * 0

    # Employment Yield estimate
    row[8] = employment_acres

  else:
    # First Deduction: Constrained vs nonConstrained land
    if row[3] == 0 or row[3] is None:
      row[5] = row[2]
    else:
      row[5] = row[2] * .5

    #filters
    if row[6] == "Road or Easement":
      row[5] = 0
    if row[2] < .022:
      row[5] = 0
    if row[7] == "Zero Value":
      row[0]= 0

    employment_acres = row[5]
    # 2nd Deduction: Employment land Splits
    if row[4] == "LSN":
      employment_acres = employment_acres * .05
    elif row[4] == "MSN":
      employment_acres = employment_acres * .1
    elif row[4] == "MU":
      employment_acres = employment_acres * .35
    elif row[4] == "IC":
      employment_acres = employment_acres * .75
    elif row[4] == "RAC":
      employment_acres = employment_acres * .4
    elif row[4] == "IE":
```

```
    employment_acres = employment_acres * 1
elif row[4] == "HI":
    employment_acres = employment_acres * 1
else:
    employment_acres = employment_acres * 0

# 3rd Deduction: redevelopment
if row[4] == "MU":
    employment_acres = employment_acres * .128
elif  row[4] == "RAC":
    employment_acres = employment_acres * .274
elif  row[4] == "IE":
    employment_acres = employment_acres * 0.0
elif row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres * 0.0
else:
    employment_acres = employment_acres * 0

# 4th Deduction: Infrastructure
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "MU":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "RAC":
    employment_acres = employment_acres - (employment_acres * .315)
elif row[4] == "IE":
    employment_acres = employment_acres - (employment_acres * .125)
elif row[4] == "HI":
    employment_acres = employment_acres - (employment_acres * .25)

# Employment Acres estimate
row[5] = employment_acres

# 5th Deduction: Apply Job Density by placetype
if row[4] == "LSN" or row[4] == "MSN":
    employment_acres = employment_acres * 6
elif row[4] == "MU":
    employment_acres = employment_acres * 48
elif row[4] == "IC":
    employment_acres = employment_acres * 46
elif row[4] == "RAC":
    employment_acres = employment_acres * 54
```

```
        elif row[4] == "IE":
            employment_acres = employment_acres * 30
        elif row[4] == "HI":
            employment_acres = employment_acres * 9
        else:
            employment_acres = employment_acres * 0

        # Employment Yield estimate
        row[8] = employment_acres

    # Update the row
    cursor.updateRow(row)

print("Field values calculated and updated.")
```

DATE:	April 2, 2026
TO:	Nicole McDermott, WSP
FROM:	Tyler Bump and Josie Rademacher, ECOnorthwest
SUBJECT:	Housing Needs and Land Capacity Analysis

This analysis was conducted to evaluate how the Our Vancouver, Vancouver's 2045 Comprehensive Plan Update, Preferred Alternative performs relative to the identified housing needed in the City of Vancouver by income category through 2045. This housing need and capacity analysis indicates that the City of Vancouver through the Comprehensive Plan, new zoning designations, and new zoning map meets all housing needs by income category identified in the City of Vancouver Housing Needs Assessment. This analysis indicates the Preferred Alternative results in a net capacity surplus of 5,983 units across Vancouver. Additionally, the Preferred Alternative results in a capacity surplus for all income levels of housing need.

Housing Need

The Washington State Department of Commerce Housing for All Planning Tool (HAPT) identifies a total housing need in Vancouver of 43,198 housing units from 2020 to 2045. To account for a 2023 base planning year, the project team subtracted 5,069 housing units built from 2020 to 2023 in the city. Overall, this indicates a total need of 38,129 housing units from 2023 to 2045.[1] The breakdown in housing need by income is approximately as follows[2]:

- 2,600 Permanent Supportive Housing (PSH) units
- 4,423 non-PSH units for households below 30% AMI (extremely low income)
- 5,890 units between 30 to 50% AMI
- 5,788 housing units between 50 and 80% AMI (low income).
- 3,351 units between 80 to 100% AMI (moderate income)
- 3,175 housing units between 100 to 120% AMI (moderate to middle income)
- 12,902 housing units over 120% AMI (high income)

The HAPT estimate also shows 406 emergency living units (in the form of beds providing temporary housing) available and 1,405 emergency shelter beds needed as identified by Clark County by 2045.

[1] Washington State Department of Commerce. (March 1, 2023). This analysis relied on Allocation Method A.
[2] The City of Vancouver completed their Housing Needs Assessment prior to Clark County allocating housing need. Therefore, the need identified through the HAPT tool is different from the allocation from the County. The section at the end of this memorandum "Aligning Vancouver Housing Needs with County Allocation" demonstrates Vancouver's capacity to meet the need by income band using either the HAPT tool or the County allocation.

Land Capacity by Zone

Exhibit 1 summarizes land capacity by zone for the 2045 Comprehensive Plan Update Preferred Alternative. Technical documentation on assumptions and methodology can be found in the February 2026 Market and Land Capacity Analysis Methodology and Process for the Preferred Alternative Memorandum. This summary includes total land area, developable land, assumed achieved densities (from prototype feasibility analysis), gross residential capacity, existing housing on developable land, and net residential capacity. This table summarizes total net residential capacity for all zoning designations.

Exhibit 1. Development Capacity by Zoning Designation, Preferred Alternative

Source: City of Vancouver, Clak County Assessor, WSP, ECOnorthwest

Development Capacity by Zone						
Zoning Designation	Total Land Area	Developable Land (acres)	Assumed Achieved Density (units/acre)	Gross Residential Capacity	Existing Housing on Developable Land	Net Residential Capacity (units)
Manufactured Home	211	0	0	0	1,439	0
Low-Scale Neighborhood	5,830	686	29	8,525	1,252	7,273
Medium-Scale Neighborhood	6,304	825	47	18,994	3,167	15,827
Mixed-Use Neighborhood	2,707	276	61	6,842	243	6,599
Regional Activity Center	1,569	97	84	10,639	14	10,625
Institutional/Campus	1,168	357	49	3,805	17	3,788

Exhibit 2 indicates that while there are 53,269 lots that are eligible lots where ADUs can be built across Vancouver, the anticipated amount of ADUs that are likely to get built is much less. For the sake of this capacity analysis, the project team evaluated recent trends in ADU production and forecasted future ADU production at similar rates while accounting for multiple ADUs allowed on eligible lots. Over the past three years, there were on average 32 ADUs built annually. Assuming an adjustment for new two ADU allowances per primary residential unit, this analysis assumes that 64 ADUs per year is a reasonable assumption given past trends and new ADU allowances. This indicates that there is a reasonable ADU capacity of 1,280 units through 2045.

Exhibit 2. ADU Development Capacity, Preferred Alternative

Source: City of Vancouver, WSP, ECOnorthwest

ADU Capacity					
ADU-Eligble Lots	Assumed ADU Production per Year	Assumed Long-Term Housing Percentage	ADU Production Long-Term Housing	ADU Production Greater than Eligible Lots?	Total ADU Capacity
53,269	64	2.8%	1280	No	1,280

Affordability Levels by Zoning Designation

To inform the affordability of housing within each zoning designation, price data was gathered for housing types within each zoning designation. These housing prices were derived from 18-month price trends that were collected to inform the rent and sales price assumptions for the relevant housing types in the pro formas used to support the development capacity analysis.

Exhibit 3. Affordability Level and Housing Type by Zoning Designation

Source: Clark County Assessor, CoStar, Redfin, ECOnorthwest

Zoning Designation	Typical Housing Types Allowed	Lowest Potential Income Level Served		Assumed Affordability Level of Capacity Analysis
		Market Rate	With Subsidies	
Manufactured Home	Manufactured Homes	Low to Moderate Income (30-80% AMI)	Very Low to Low Income (0% AMI - 50% AMI)	Low Income (0-80% AMI)
Low-Scale Neighborhood	Single-family Residential Building, Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, and Cottage Court Building	High Income (100->120% AMI)	Moderate Income (80-120% AMI)	Higher Income (100% AMI - >120% AMI)
Residential Neighborhoods	Single-family Residential Building, Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, Cottage Court Building, and Multifamily Building	Moderate to High Income (80% AMI-120% AMI)	Moderate Income (50% AMI-120% AMI)	Moderate Income (80% AMI-120% AMI)
Urban Mixed-Use	Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, Cottage Court Building, Multifamily Building, Mid-Rise Residential Building, and Mixed-Use Residential Building	Moderate Income (>80% AMI-120% AMI)	Low to Moderate Income (0% AMI-80% AMI)	Low to Moderate Income (0% AMI-100% AMI) PSH
Urban Mixed-Use	Multifamily Building, Mid-Rise Residential Building, and Mixed-Use Residential Building	Moderate Income (>80% AMI-120% AMI)	Low to Moderate Income (0% AMI-80% AMI)	Low to Moderate Income (0% AMI-100% AMI) PSH
Employment Mixed Use	Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, Multifamily Building, Mid-Rise Residential Building, and Mixed-Use Residential Building	Moderate Income (>80% AMI-120% AMI)	Low to Moderate Income (0% AMI-80% AMI)	Low to Moderate Income (0% AMI-100% AMI) PSH
ADUs	Accessory Dwelling Units on developed residential lots	Moderate Income (50% AMI-120% AMI)	N/A	Moderate Income (50% AMI-120% AMI)

Affordability Data Sources by Zoning Designation and Housing Type

ECOnorthwest analyzed over 20 housing prototypes that were of various configurations and resulting densities. We based the prototypes off recent actual developments throughout the City of Vancouver as well as potential scales of housing that might be allowed in the future given legislative changes at the state level. Though the scale of development ranges substantially throughout the city, we triangulated approximate prototypes that might be possible in Vancouver.

We drew our initial market and construction cost insights from third-party sources such as the American Community Survey (ACS), Costar, Redfin, and Craftsman, and then vetted those assumptions with local developers and brokers. Though cost assumptions typically stay consistent throughout a city, we created a model to help differentiate the revenue assumptions (i.e., rent and sales prices) by census tract This model used rent and sales data from ACS, to interpolate what revenue assumptions might be for each census tract in the city.

We then aligned similar block groups, based on rent and sales prices, into ten newly defined market areas across the City of Vancouver. We took those results and compared them to the city-wide average to understand how each market area related (expressed as a ratio) which we could then apply as an input to each rent or sales price on a prototype level with the most up-to-date market data from CoStar and Redfin. This revenue model allowed us to refine our pro forma results spatially – different areas of Vancouver have different demand for different types of housing, which impacts the resulting feasibility of housing development.

Exhibit 4. Housing Needs and Capacity by Income Level

Zoning Designation	Typical Housing Types Allowed	Data Sources
Manufactured Homs	Manufactured Homes	Redfin
Low-Scale Neighborhood	Single-family Residential Building, Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, and Cottage Court Building	Redfin, CoStar, Clark County Assessor, Pro-Forma Analysis
Residential Neighborhoods	Single-family Residential Building, Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, Cottage Court Building, and Multifamily Building	Redfin, CoStar, Clark County Assessor, Pro-Forma Analysis
Urban Mixed-Use	Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, Cottage Court Building, Multifamily Building, Mid-Rise Residential Building, and Mixed-Use Residential Building	Redfin, CoStar, Clark County Assessor, Pro-Forma Analysis
Urban Mixed-Use	Multifamily Building, Mid-Rise Residential Building, and Mixed-Use Residential Building	Redfin, CoStar, Clark County Assessor, Pro-Forma Analysis
Employment Mixed Use	Townhouse/Rowhouse, Stacked Multi-Plex Building, Multi-Cluster Building, Multifamily Building, Mid-Rise Residential Building, and Mixed-Use Residential Building	Redfin, CoStar, Clark County Assessor, Pro-Forma Analysis
ADUs	Accessory Dwelling Units on developed residential lots	Interviews

Reconciling Housing Needs and Capacity by Income Level

Exhibit 5 summarizes the reconciliation of housing needs and housing capacity by income level and by Comprehensive Plan and Zoning Designations. This analysis indicates the Preferred Alternative results in a net capacity surplus of 5,983 units

across Vancouver. Additionally, the Preferred Alternative results in capacity surpluses for all income levels.

Exhibit 5. Housing Needs and Capacity by Income Level
Source: City of Vancouver, WSP, ECOnorthwest

Income Level (% AMI) and Special Housing Needs	Allocated Housing Need	Comp Plan Desingations (Zoning District) Serving These Needs	Aggregated Housing Need	Total Capacity	Capacity Surplus
0-30% AMI (PSH)	2,600	Residential Neighborhoods (Manufactured Home)*; Urban Mixed-Use (Mixed-Use Neighborhood); Urban Mixed-Use (Regional Activity Center); Employment Mixed Use (Institutional/Campus)	18,701	21,012	2,311
0-30% AMI (Other)	4,423				
>30-50% AMI	5,890				
>50-80% AMI	5,788				
>80-100% AMI	3,351	Residential Neighborhoods (Medium-Scale Neighborhood)*	6,526	6,647	121
>100-120% AMI	3,175				
>120% AMI	12,902	Residential Neighborhoods (Low-Scale Neighborhood); Residential Neighborhoods (Medium-Scale Neighborhood);	12,902	16,453	3,551
Total	**38,129**	-	**38,129**	**44,112**	**5,983**

* 42% of Medium-scale neighborhood capacity assumed in 80-120% AMI and 58% of capacity in >120% AMI capacity

Planning for Below Market Rate Housing Needs

While this analysis, and the related development capacity analysis and housing needs assessment, indicate the land use and zoning in the Preferred Alternative meet the City of Vancouver's housing needs, additional financial subsidies will be required to meet the need for housing at 0-80% AMI levels. While not required to satisfy requirements of HB1220, this analysis was conducted to identify what level of subsidy would be required on an annual basis to build below market rate housing that is needed across the city using the two most available funding sources for affordable and middle-income housing: the Multifamily Tax Exemption Program and the Low Income Housing Tax Credit program. The subsidies needed per unit for these income levels was identified through the pro-forma analysis by identifying the funding gap necessary to target affordability at these income levels.

Exhibit 6. Annual Subsidy Needed to Deliver Below Market Rate Housing
Source: ECOnorthwest

	0-50% AMI	50-80% AMI
Total Units Needed By Income Depth	12,913	5,788
Estimated Number of Units Needed Annually	646	289
Applicable Funding Program For Respective Unit Depth	Tax Credits	MFTE
Estimated Number of Units Delivered Annually by Applicable Program	130	195
Estimated Share of Potential Units Covered by Applicable Program	20%	67%
Estimated Remaining Annual Units Not Funded	516	94
Estimated Subsidy Needed Per Unit	$400,000	$325,000
Total Subsidy Needed Annually	**$206,260,000**	**$30,680,000**

Funding for Below Market Rate Housing

The City of Vancouver is committed to increasing affordable housing throughout the community and utilizing all available tools to achieve its housing goals. Alongside regulatory changes, permitting fee reductions, and process improvements, the city supports income-restricted affordable housing development through the following programs and funding sources.

- **Affordable Housing Fund.** Local voter approved property tax levy provides $10M annually through 2033 direct investments toward the acquisition, construction or preservation of affordable housing for households making 50% Average Median Income (AMI) or below (rental units) or 80% AMI or below (homeownership units).
- **HOME Investment Partnerships program.** Federal Department of Housing and Urban Development (HUD) entitlement funding supports rental assistance, housing construction, preservation, acquisition, and homeowner/homebuyer assistance for households making 60% AMI or below (rental assistance/units) or 80% AMI or below (homeownership assistance/units).
- **Community Development Block Grant (CDBG) program.** Federal HUD entitlement supports homeowner/homebuyer assistance for households making 60% AMI or below (rental assistance) or 80% AMI or below (home ownership).
- **Multifamily Tax Exemption (MFTE) incentive.** The city deploys state authorized property tax exemption for market rate and income restricted multifamily housing projects. Projects offering 20% of units at or below 80% AMI receive 12-year property tax exemption. Market rate projects pay into a Fee-in-Lieu Fund.

- **Affordable Housing Fee-in-Lieu Fund**. Funded by contributions from MFTE market rate projects, supports development of affordable housing and property acquisition for future development for households making 60% AMI or below (rental units) or 80% AMI or below (homeownership units).
- **Impact Fee Waivers.** These waive up to 80% of park and traffic impact fees for new affordable housing developments affordable to households making up to 80% of AMI.
- **Construction Sales Tax Deferral (CSTD).** Defers sales and use taxes for new construction of multifamily housing on public parking lots for 10 years, for projects affordable at 80% AMI (rental units) and 115% AMI for (homeownership units).
- **Affordable Housing Sales Tax and Sales Tax Credit.** Vancouver has implemented both state enabled sales tax revenue streams to fund affordable and supportive housing.
- **Dedication of $10M from the American Rescue Fund Act** to acquire properties for future affordable housing development.
- **Real Estate Excise Tax (REET).** Historically, the City has utilized Real Estate Excise Tax (REET) to acquire land for future affordable housing development.
- In addition, the City actively supports project utilization of State programs and funding for affordable housing in Vancouver and southwest Washington, including WSHFC tax credits, the Housing Trust Fund, the Connecting Housing to Infrastructure Program (CHIP) to cover water and sewer infrastructure and connection fees, and legislative appropriations.

Considerations for Emergency Housing

Emergency housing, emergency shelters, and transitional housing are allowed uses by right in all zones across Vancouver that allow residential and lodging uses. Changes to the zoning map and new designations create allowances for these housing types across the applicable zones that allow residential and hotel uses across Vancouver. Clark County identified the need for approximately 1,405 emergency shelter beds in Vancouver. The table below summarizes the total acres of zoned capacity by zone where emergency housing, emergency shelters, and transitional housing are allowed.

Exhibit 7. Zoned Capacity by Zoning Designation Where Emergency Housing and Shelters Are Allowed Uses

Source: WSP

Zoning Designation	Acres
Manufactured Home	205
Low-Scale Neighborhood	5,830
Medium-Scale Neighborhood	6,304
Mixed-Use Neighborhood	2,707
Regional Activity Center	1,569
Institutional/Campus	1,168

Aligning Vancouver Housing Needs with County Allocation

The housing needs assessment and subsequent findings in this analysis utilized the Housing for All Planning (HAPT) tool and relied on Allocation Method A. Using these housing needs assessment findings, the City of Vancouver is planning for 1,601 more units over the planning horizon than Clark County has allocated to Vancouver during the county allocation process. Applying a consistent methodology to reconcile housing needs across both the Vancouver HNA and the Clark County allocation with the Vancouver Comprehensive Plan Land Capacity analysis indicates that the development capacity achieved through the 2045 Vancouver Comprehensive Plan Update meets total housing need and housing needs by income level of both methodologies. Exhibit 8 below summarizes housing needs and total capacity for the Clark County Housing Needs Allocation method which indicates that the Draft 2045 Vancouver Comprehensive Plan also meets housing needs by income category allocated by Clark County.

Exhibit 8. Housing Needs and Capacity by Income Level – Clark County Allocation Method

Source: Clark County, City of Vancouver, WSP, ECOnorthwest

Income Level (% AMI) and Special Housing Needs	Allocated Housing Need	Comp Plan Desingations (Zoning District) Serving These Needs	Aggregated Housing Need	Total Capacity	Capacity Surplus
0-30% AMI (PSH)	2,600	Residential Neighborhoods (Manufactured Home)*; Urban Mixed-Use (Mixed-Use Neighborhood); Urban Mixed-Use (Regional Activity Center); Employment Mixed Use (Institutional/Campus)	13,833	21,012	7,179
0-30% AMI (Other)	4,641				
>30-50% AMI	5,227				
>50-80% AMI	1,365				
>80-100% AMI	1,459	Residential Neighborhoods (Medium-Scale Neighborhood)*	6,340	6,647	307
>100-120% AMI	4,881				
>120% AMI	16,355	Residential Neighborhoods (Low-Scale Neighborhood); Residential Neighborhoods (Medium-Scale Neighborhood)	16,355	16,453	98
Total	**36,528**	-	**36,528**	**44,112**	**7,584**

* 42% of Medium-scale neighborhood capacity assumed in 80-120% AMI and 58% of capacity in >120% AMI capacity

Capital Facilities Plan

6- and 20-Year Project Lists

The projects included in this document list known capital projects for the short- and long-term planning period (2026-2045). The projects will provide capacity to serve anticipated growth over the planning period, consistent with the adopted land use map.

Updated: April 6, 2026

Wastewater Management Capital Improvement Plan (2026-2045)

Project Facility	Timeframe (1-6y)	Cost Estimate
Main St - 5th to 15th Transpo*	2026-2031	$100,000
Heights District Redevelopment	2026-2031	$1,550,000
Grand Loop Infrastructure	2026-2031	$950,000
IR - Interceptor Rehabilitation	2026-2031	$15,000,000
Manhole/Wye Rehabilitation	2026-2031	$400,000
Capital Preservation - Collection System	2026-2031	$15,000,000
Wastewater Collection SCADA	2026-2031	$450,000
Southside Interceptor Rehab Ph 4B	2026-2031	$1,500,000
2026 General Sewer Plan Update	2026-2031	$735,000
Pinebrook Pump Station Upgrade	2026-2031	$1,000,000
Burnt Bridge Creek Interceptor Rehab Study & Design	2026-2031	$1,600,000
Burnt Bridge Creek Interceptor Ph 1	2026-2031	$3,000,000
Burnt Bridge Creek Interceptor Ph 2	2026-2031	$3,000,000
Burnt Bridge Creek Interceptor Ph 3	2026-2031	$4,000,000
Burnt Bridge Creek Interceptor Ph 4	2026-2031	$5,000,000
East Interceptor Rehab Ph 3	2026-2031	$8,000,000
East Interceptor Rehab Ph 4	2026-2031	$6,200,000
East Interceptor Rehab Ph 5	2026-2031	$6,200,000
East Interceptor Rehab Ph 6	2026-2031	$8,500,000
East Interceptor Rehab Ph 7	2026-2031	$5,500,000
G2 Sewer Basin/Trunk Interceptor Realignment	2026-2031	$1,100,000
NE 152nd Ave Sewer Extention	2026-2031	$50,000
Section 30 South Pump Station	2026-2031	$2,500,000
NE 65th Ave Sewer Replacement	2026-2031	$2,000,000
Sewer Connection Incentive Program	2026-2031	$8,000,000
NE 60th St SCIP	2026-2031	$500,000
NE 51st St SCIP	2026-2031	$1,000,000
West Vancouver Ph 1 SCIP	2026-2031	$1,500,000
Camelot Court SCIP	2026-2031	$2,600,000
Marine Park Bar Screens Upgrade	2026-2031	$5,800,000
Marine Park Ph 2A - Secondary Process Enhancements	2026-2031	$5,540,000
Marine Park WWTF Process Piping R&R	2026-2031	$1,200,000
Marine Park Influent Pump Replacement	2026-2031	$600,000

Marine Park Medium Voltage Upgrade		2026-2031	$400,000
Marine Park Pump #3		2026-2031	$1,000,000
Marine Park Secondary Clarifier Lining/Rehab(4)		2026-2031	$2,000,000
Marine Park Washdown PS Rehab		2026-2031	$750,000
Marine Park Medium Voltage Electrical		2026-2031	$1,500,000
Marine Park Clarifier #5 and #6 Rehab		2026-2031	$800,000
Marine Park Primary Underflow VFDs/Process Improvements		2026-2031	$1,500,000
Westside WWTF Process Piping R&R		2026-2031	$1,700,000
West 16th St Pump Station Improvements		2026-2031	$800,000
Westside Odor Control Improvements		2026-2031	$4,000,000
Westside - Centrifuge #1 System Replacement		2026-2031	$3,400,000
Westside Electrical Upgrades		2026-2031	$1,000,000
Westside Solids Treatment Upgrades		2026-2031	$101,200,000
Westside Incinerator Ash Drum Replacement		2026-2031	$500,000
Westside Equipment and Parts Storage Building		2026-2031	$2,000,000
Westside Aeration Basin Diffuser Grid Replacements		2026-2031	$3,000,000
Westside Bypass Pump Screenings/Improvements		2026-2031	$500,000
MP/WS Process Controls Electronics		2026-2031	$500,000
Industrial & Buildings Coating Projects		2026-2031	$100,000
MP/WS Chemical Tanks Refurbish		2026-2031	$400,000
Lagoon Force Main Repairs		2026-2031	$1,200,000
Lagoon Frito Lay PS and Force Main		2026-2031	$3,000,000
Lagoon Blower #2		2026-2031	$2,000,000
Capital Preservation and Compliance		2026-2031	$5,000,000
Andresen Medium Voltage Electrical		2026-2031	$750,000
Orchards Medium Voltage Electrical		2026-2031	$750,000
SCADA Overhaul		2026-2031	$750,000
Total	**Timeline (1-6y)**		**$260,575,000**

Project Facility	**Timeline (7-20y)**	**Cost Estimate**
West Fourth Plain Collection	2032-2045	$4,000,000
Fruit Valley Interceptor	2032-2045	$5,000,000
W 37th St - Daniels to Division	2032-2045	$3,300,000
Basin A20-1 (59th St connection) & GMA forcemain relocate	2032-2045	$3,000,000
NW Lakeshore Ave/Westside Interceptor	2032-2045	$3,000,000
AB Interceptor - Andresen	2032-2045	$5,000,000

AB Interceptor - NE 86th Ave South of Burton Rd		2032-2045	$5,500,000
A Interceptor (A-1) - Meadowbrook		2032-2045	$3,000,000
B Interceptor - Burton Rd		2032-2045	$3,000,000
A Interceptor (A-1) - Kevanna Park to east of NE 121st Ave		2032-2045	$3,000,000
G2 Interceptor - east of Andresen		2032-2045	$2,000,000
NW Lincoln and Mill Plain		2032-2045	$1,500,000
G1 Trunk - MacArthur/Blandford		2032-2045	$3,000,000
Interceptor C&D - Marine Park Section		2032-2045	$5,000,000
Marine Park Solids Conveyance		2032-2045	$17,000,000
Marine Park Ph 3 - Complete Full Site Capacity		2032-2045	$51,000,000
Marine Park Primary Clarifier Mechanisms (6)		2032-2045	$2,000,000
Marine Park PS & WAS Force Mains Rehab (2)		2032-2045	$1,000,000
Marine Park Aeration Basin Diffuser Grid Replacement (6)		2032-2045	$1,500,000
Marine Park Odor Control Fiberglass Ductwork/Tower (2)		2032-2045	$3,000,000
Marine Park Roof Replacement		2032-2045	$3,000,000
Marine Park Outfall (Wetlands) Rehab		2032-2045	$3,000,000
Marine Park Grit Classifiers/Chutes/Dumpster Room		2032-2045	$2,000,000
Marine Park Portco PS Rehab		2032-2045	$1,200,000
Westside Solids Treatment Upgrades		2032-2045	$120,000,000
Westside Treatment Capacity Expansion		2032-2045	$60,000,000
Westside UV Upgrade		2032-2045	$3,000,000
Westside Replace/Rehab Screens (2)		2032-2045	$1,500,000
Westside RAS/MLSS Return Lines/Rehab (6)		2032-2045	$6,000,000
Westside Influent Pump Station Overhaul/Replacement		2032-2045	$1,000,000
Westside Outfall Conditions Assessment/Rehab		2032-2045	$500,000
Westside Primary Clarifier/Splitter Box/Scum Management		2032-2045	$4,000,000
Westside Aeration Basins Improvement (automated valves etc.)		2032-2045	$4,000,000
Westside Medium Voltage Electrical		2032-2045	$12,000,000
Westside Schwing Pumps		2032-2045	$4,000,000
Westside Replace/Rehab Centrifuges		2032-2045	$2,000,000
Westside Replace Gravity Belt Thickeners (2)		2032-2045	$5,000,000
Lagoon IPL MV Electrical		2032-2045	$1,500,000
Orchards PS Rehab		2032-2045	$3,000,000
Orchards & Andresen Force Mains CA/Rehab		2032-2045	$1,500,000
Andresen PS Rehabilitation		2032-2045	$3,000,000
Total	**Timeframe (7-20y)**		**$366,000,000**

Total 20 Year Projects	**Timeframe 1-20y**	**$626,575,000**

Water Management Capital Improvement Plan (2026-2045)		
Production Projects	**Timeframe (1-6y)**	**Cost Estimate**
WS 1 Improvements	2026	$4,000,000
WS 4 Improvements	2029-2031	$1,499,000
WS 7 Improvements	2026	$600,000
WS 8 Improvements	2030-2031	$1,733,000
WS 15 Improvements	2031	$2,895,000
Ellsworth Improvements	2027-2029	$8,260,000
Well Level Probes	2028	$40,000
Total Production Projects		**$19,027,000**
PFAS Mitigation	**Timeframe (1-6y)**	**Cost Estimate**
WS 1 PFAS Treatment	2026-2029	$39,900,000
WS 3 PFAS Treatment and Improvements	2026-2030	$54,300,000
WS 4 PFAS Treatment	2026-2029	$40,100,000
WS 7 PFAS Treatment	2030-2031	$12,400,000
WS 8 PFAS Treatment	2029-2031	$16,600,000
WS 9 PFAS Treatment	2026-2028	$34,900,000
WS 14 PFAS Treatment	2026-2028	$11,500,000
WS 15 PFAS Treatment	2028-2030	$27,600,000
PFAS Media Changouts	2030	$1,000,000
Total PFAS Mitigation		**$238,300,000**
SCADA Projects	**Timeframe (1-6y)**	**Cost Estimate**
SCADA PLC Hardware Update	2026-2031	$240,000
SCADA Hardware Upgrade	2026-2031	$193,000
SCADA Software/HMI Hardware	2026-2031	$579,000
Total SCADA Projects		**$1,012,000**
Distribution Projects	**Timeframe (1-6y)**	**Cost Estimate**
Pipe R&R	2026-2031	$8,409,000
Utility Coordination	2026-2030	$3,600,000
Total Distribution Projects		**$12,009,000**
Transmission Projects	**Timeframe (1-6y)**	**Cost Estimate**

NE 152nd Ave and NE 99 St	2030-2031	$7,155,000
NE 18th and NE 192nd	2028-2030	$26,392,000
SE 192nd	2028-2030	4,304,000
Total Transmission Projects		**$37,851,000**
Other		
Operations Center Redev & Constr	2026-2027	$105,000,000
AMI Installation	2028-2031	$22,069,000
Total Other		$127,069,000
Total 1-6y 2026-2031	**Timeframe (1-6y)**	**$435,268,000**
Project list (7-20y)	**Timeframe (7-20y)**	**Cost Estimate**
General		
Pump House Roofing	2036	$200,000
AMI Installation	2032	$5,468,000
SCADA		
SCADA PLC Hardware Upgrade	2032-2035	$160,000
SCADA Software/HMI Hardware	2032-2035	$386,000
SCADA Hardware Upgrade	2032-2035	$129,000
Supply		
WS 6 Well/Treatment Installation	2036	$31,860,000
WS 7 Improvements	2032	$200,000
WS 7 PFAS Treatments	2032	$4,000,000
WS 8 Improvements	2032	$867,000
WS 8 PFAS Treatment	2032	$10,070,000
WS 9 Improvements	2036	$200,000
WS 15 Improvements	2032-2033	$5,791,000
Storage		
6 MG Tank in Heights High (Gravity Fed)	2032-2033	$45,000,000
5 MG AT Grade Tank in Heights High (Need a PS)	2036	$13,750,000
Vancouver High Additional Storage	2036	$15,000,000
Pipeline		
Pipe R&R	2032-2036	$26,523,000
Utility Coordination	2032-2036	$8,400,000
NE 152nd Ave and NE 99 St	2032	$3,578,000

NE Burton and NE 110		2036	$14,197,000
NE 9th St		2035	$301,000
Highway 14 to Ellsworth WTP		2036	$41,785,000
Daniels St		2033-2035	$6,666,000
Fruit Valley Rd		2034-2035	$3,998,000
NE St Johns Rd to NE 78th St		2032-2035	$14,892,000
NE 88th St		2034-2035	$1,728,000
Growth LT		2036	$17,976,000
NE 94th Ave		2036	$462,000
NE 68th St		2036	$337,000
NE St Johns Rd		2036	$340,000
NE 15th Ave		2036	$1,522,000
NW Olive St, NW 46th St, NW Chesnut St,		2036	$1,142,000
2701 NE Lower Rd		2036	$150,000
W 24th St		2036	$183,000
N St		2036	$146,000
E 33rd St, E 34th St		2036	$273,000
Neal Ln, Rossiter Ln, E 29th St		2036	$1,812,000
W 17th St, W 11th St		2036	$917,000
E Evergreen Blvd, E 13th St, E St		2036	$752,000
E Mcloughlin Blvd		2036	$126,000
Cellars Ave		2036	$981,000
E Mill Plain Blvd		2036	$349,000
E 8th St, E 2nd St, X St, V St		2036	$1,848,000
E 5th St, SE Shorewood Dr Crossing		2036	$470,000
Lieser Ct, NE 82nd Ave, NE 5th St, NE 7th St		2036	$584,000
SE 19th St, Ellsworth Springs, NE 4th St, SE Chkalov Dr		2036	$1,463,000
SE 39th St		2036	$421,000
Flow/Pressure Monitoring Improvements at PRV Stations		2036	$2,000,000
Total 7-20y (2032-2045)			**$289,403,000**
Total 20 Year Projects	**Timeframe 20y**		**$724,671,000**

Surface Water Management Capital Improvement Plan (2026-2045)

Project Facility	Timeframe (1-6y)	Cost Estimate
Regulatory Compliance and UIC Retrofit Projects	2026-2031	$450,000
Columbia Way to Columbia River Retrofits - Grant	2026-2031	$1,000,000
Linda Lane Vault Retrofit Design - Grant	2026-2031	$4,445,000
Garrison Heights Design - Grant	2026-2031	$370,000
W 22nd St & Thompson - Grant	2026-2031	$1,000,000
Facility Retrofits Program	2026-2031	$750,000
Primrose Court Swale Retrofit	2026-2031	$400,000
BBC Property Acquisition - Phase 3	2026-2031	$635,000
Coordination Projects (SCIP/Trans)	2026-2031	$550,000
Mill Creek at Evergreen Hwy Culvert Replacement	2026-2031	$3,200,000
Peterson Channel Basin Assessment and Rehab (NE 112th & 39th)	2026-2031	$1,750,000
Lincoln Outfall Basin Retrofit - W Fourth Plain	2026-2031	$2,450,000
Downtown Capacity Analysis & Upgrade	2026-2031	$600,000
Failed Storm Main Lining & Repair	2026-2031	$850,000
Substandard Swale/LID Retrofits	2026-2031	$300,000
Roadway Culverts Assessment	2026-2031	$850,000
WSDOT Fee Projects	2026-2031	$524,000
Water Quality Vaults Assessment & Water Quality Evaluation	2026-2031	$950,000
Ambient Water Quality Monitoring	2026-2031	$940,000
Stormwater Demand Response (Op Coordination Substandard Systems & PIT Cases	2026-2031	$900,000
Kiggins Bowl	2026-2031	$100,000
NE 3rd St Infiltration Expansion	2026-2031	$50,000
BBC WQ Study TMDL/SMAP Projects (Identified)	2026-2031	$1,500,000
Middle Burnt Bridge Creek Basin SMAP	2026-2031	$328,000
Total (1-6y)		**$24,892,000**

Project Facility	Timeframe (7-20y)	Cost Estimate
Arterial Safety/Treatment Projects	2032-2046	$1,800,000
Property Acquisition Grants	2032-2046	$500,000
Fisher's Creek Culvert	2032-2046	$250,000
Watershed Planning	2032-2046	$10,500,000
Columbia Slope Study (Herrera 2022)	2032-2046	$3,250,000

Total (7-20y)		**$16,300,000**
Total 20-Year Projects	**Timeframe 1-20y**	**$41,192,000**

Solid Waste Management		
Project Facility	**Timeframe (1-6y)**	**Cost Estimate**
West Van Transfer Station Improvements		
Ph 1 Site Improvements	2026-2027	$1,400,000
Ph 2 Utilities/Site work	2027-2028	$2,000,000
Ph 2B Expansion for organics and top load	2028-2030	$6,700,000
Ph 3 New Office Center	2031	$1,100,000
Ph 4 New Recycle/HHW Center	2031	$1,500,000
Total (1-6y)	**Timeframe (1-6y)**	**$12,700,000**
Project Facility	**Timeframe (7-20)**	**Cost Estimate**
Ph 3 New Office Center	2032	$1,000,000
Ph 4 New Recycle/HHW Center	2032	$1,500,000
Total (7-20y)	**Timeframe (7-20)**	**$2,500,000**
Total 20-Year Projects	**Timeframe 1-20y**	**$15,200,000**

Vancouver Fire and EMS		
Project Facility	**Timeframe (1-6y)**	**Cost Estimate**
PRJ100620-Fire Station 3 New Construction	2026-2029	$23,865,000
PRJ100697-Fire Station 6 New Construction	2026-2029	$23,435,000
PRJ100155-Fire Station 8 Seismic Retrofit & Crew Accommodation	2025-2029	$14,265,000
Fire Station 4 Seismic Retrofit	2029-2031	$1,950,000
Rebuild Station 5	2030-2034	$48,900,000
Fire Station 5 Seismic Retrofit & Crew Accommodation	2027-2031	$7,800,000
PRJ100948-Fire Station 5 Warehouse	2026	$300,000
Total	**Timeframe (1-6y)**	**$120,515,000**
Project Facility	**Timeframe (7-20y)**	**Cost Estimate**
Land acquisition for waterfront station	2035-2045	$11,700,000
Design and build waterfront station	2035-2045	$29,700,000
Design/Build a station in NE Vancouver	TBD	TBD
Total	**Timeframe (7-20y)**	**$41,400,000**
Total 20-Year Projects	**Timeframe 1-20y**	**$161,915,000**

Police and Public Safety			
Project Facility	**Timeframe (1-6y)**		**Cost Estimate**
Aquire Property for Headquarters		2025-2029	$1,400,000
Design/Build Headquarters		2029-2033	$39,100,000
Renovate East Precinct		2030-2034	$12,000,000
Expand the Evidence Facility		2030-2034	$11,900,000
Total	**Timeframe (1-6y)**		**$64,400,000**
Project Facility	**Timeframe (7-20y)**		**Cost Estimate**
Design/Build new precinct	2045-TBD		48,500,000
Purchase property for Joint PS Training Facility		2026-TBD	$2,900,000
Design/Build PS Training Facility		2035-TBD	$110,200,000
Total	**Timeframe (7-20y)**		**$113,100,000**
Total 20-Year Projects	**Timeframe 1-20y**		**$177,500,000**

Transportation Improvement Program (1-6 years)

Project	Timeframe (1-6y)	Cost Estimate
NE 137th Ave. - NE 49th St. to NE Fourth Plain Blvd.	2026	$100,000
Main Street Promise	2026-2027	$11,200,000
NE 18th St. - NE 97th Ave. to NE 107th Ave.	2026	$6,000,000
Jefferson St. - W. Evergreen to W. Mill Plain Blvd.	2026	$100,000
MacArthur Blvd. - Mill Plain to Blandford D	2026-2027	$10,000,000
Heights Grand Loop - Devine Rd. to MacArthur Blvd.	2026-2027	$20,000,000
NE 184th Ave. - SE 1st St. to NE 4th S	2026	$1,750,000
NE 52nd St. and NE 135th Ave Pedestrian Crossing (Image Elementary) (SRTS)	2026	$300,000
Fourth Plain Blvd. and Laurel Pl. Pedestrian Crossing (SS4A)	2026	$400,000
Fourth Plain Blvd. and Watson Ave. Pedestrian Crossing (SS4A)	2026	$400,000
Fourth Plain Blvd. and E Reserve St. Enhanced Pedestrian Crossing (SS4A)	2026	$700,000
Evergreen Hwy. Pathway - SE Chelsea Ave. to SE Image Rd.	20026	$100,000
NE 18th St. and N. Devine Rd. ADA Improvements (SS4A)	2026	$600,000
NE Fourth Plain Blvd. - Enhanced Pedestrian Crossings	2026	$500,000
NE Hazel Dell Ave./BBC Trail Crossing	2026-2027	$875,000
W 39th and Daniels St. Pedestrian Improvements (Lincoln Elementary) (SRTS)	2026	$300,000
McGillivray Complete Street and Paving Project - Chkalov Dr. to Village Loop	2026	$3,700,000
NE 112th Ave. Complete Street and Paving Project - Mill Plain Blvd. to NE 28th St.	2026	$2,985,000
E 33rd St. Complete Street and Paving Project - I-5 Overpass to St. Johns Blvd.	2026	$100,000
E 29th St. Complete Street and Paving Project - I-5 Overpass to St. Johns Blvd.	2026	$100,000
Garrison Rd. Sidewalk Improvements - Mill Plain Blvd. to David Douglas Park	2026	$1,000,000
Waterfront Way Traffic Calming/ADA	2026	$150,000
NE 72nd Ave - Sidewalk Infill (Walnut Grove Elementary) (SRTS)	2026	$2,000,000
Z St. Sidewalk Infill - Fourth Plain Blvd. to NE 26th St. (SS4A)	2026	$348,000
Neals Ln. Sidewalk Extension - E 24th St. to E 28th St. (SS4A)	2026	$535,000
Rossiter Ln. to BBC Pedestrian Connector (SS4A)	2026	$1,000,000
Todd Rd. Sidewalk Infill - Fourth Plain Blvd. to 18th St. (SS4A)	2026	$535,000
Stapleton Rd. Mobility Improvements - SR 500 to 18th St. (SS4A)	2026	$800,000
Ft. Vancouver High School Pedestrian Connection between Fourth Plain Blvd. and NE Campus Dr. (SS4A)	2026	$300,000
North-South Pedestrian Access between 57th Ave. and 62nd Ave. from Fourth Plain Blvd. and NE 34th Ave. (SS4A)	2026	$335,000
Van Plaza Drive Enhanced Pedestrian Crossing	2026	$25,000

NE 112th Ave./SE Chkalov Dr. Complete Street and Paving Project - NE 28th St. to NE 51st St.	2028-2029	$2,750,000
NE 112th Ave./SE Chkalov Dr. Complete Street Project - Mill Plain Blvd. to SE McGillivray Blvd.	2026-2027	$750,000
Upper Main St. Complete Street and Paving Project - E 37th St. to City Limits	2026	$3,135,000
Fourth Plain for All	2026	$4,000,000
St. Johns Blvd. Complete Street and Paving Project - SR 500 to NE Minnehaha St.	2028	$705,000
NE 28th St. - NE 142nd Ave. to NE 162nd Ave	2026-2031	$10,750,000
NE 18th St. - NE 141st Ave. to NE 162nd Ave.	2026-2031	$15,000,000
MacArthur Blvd., S. Lieser Rd. and St. Helens Ave. Intersection	2026-2031	$250,000
NE 192nd Ave. - SE 1st St. to NE 18th St.	2026-2031	$19,050,000
NW 78th St./Fruit Valley Rd./NW Lakeshore Ave. Roundabout	2026-2031	$300,000
NE 115th Ave. - NE 16th St. to NE 18th St.	2026-2031	$100,000
NE 152nd Ave. and NE Fourth Plain Blvd. Signal	2026-2031	$150,000
Columbia House Blvd. and Grove St. Signal Upgrade	2026-2031	$20,000
NE 192nd Ave. at SR 14 Interchange - Traffic Improvements	2026-2031	$20,000
Fourth Plain Blvd. Multiuse Path - E 62nd Ave. to Andresen Rd.	2026-2031	$1,750,000
Burton Rd./NE 28th St. Complete Street and Paving Project - NE Andresen Rd. to NE 127th Ave	2026-2031	$2,060,000
NE 122nd Ave. Complete Street and Paving Project - NE 39th St. to NE 49th St.	2026-2031	$150,000
NE 86th/87th Ave. Complete Street and Paving Project - Fourth Plain Blvd. to Mill Plain Blvd.	2026-2031	$1,095,000
NE 72nd Ave. Complete Street and Paving Project - NE 40th St. to NE 78th St.	2026-2031	$1,175,000
NE 97th/98th Ave. Complete Street and Paving Project - Burton Rd. to Mill Plain Blvd.	2026-2031	$1,280,000
NE 9th St. - NE 172nd Ave. to NE 192nd Ave.	2026-2031	$12,000,000
SE 20th St. and SE 176th Ave. Roundabout	2026-2031	$500,000
E. Mill Plain - Boise Ave. to N. Andresen Rd.	2026-2031	$10,000,000
NE 124th Ave. - NE 28th St. to NE 39th St.	2026-2031	$10,000,000
NE 187th Ave - SE 1st St to NE 18th St	2026-2031	$13,000,000
NE 13th St - NE 172nd Ave to NE 187th Ave	2026-2031	$18,000,000
Devine Rd. - Mill Plain Blvd. to Park Hill Drive South	2026-2031	$2,500,000
McGillivray and Village Loop Drive Intersection Improvements	2026-2031	$500,000
Mill Plain Blvd. and Hearthwood Blvd. Intersection Improvements	2026-2031	$500,000
SE Westridge Blvd. and SE 1st Street Intersection Improvements	2026-2031	$500,000
9th Street Illumination Project	2026-2031	$200,000
Evergreen Hwy. Pathway - Weber Arboretum to SE 100th Court	2026-2031	$1,000,000
Upper Main St. Complete Street and Paving Project- Fourth Plain Blvd. to E 37th St.	2026-2031	$1,000,000

St. Johns/St. James Complete Street and Paving Project - Fourth Plain Blvd. to City Limits	2026-2031	$1,000,000
E 33rd St. Complete Street and Paving Project - I-5 Overpass to NW Kauffman Ave. and St. Johns Blvd. to Grand Blvd	2026-2031	$700,000
E 29th St. Complete Street and Paving Project - I-5 Overpass to NW Kauffman Ave. and St. Johns Blvd. to Neals Ln	2026-2031	$700,000
Total	**Timeframe (1-6y)**	**$203,828,000**

Transportation Improvement Program (7-20 years)		
Project	**Timeframe (7-20y)**	**Cost Estimate**
NE 49th St. - NE 122nd Ave. to NE 137th Ave	2032-2045	$11,000,000
NE 18th St. - NE 87th Ave. to NE 97th Ave	2032-2045	$16,000,000
NE 18th St. - NE 164th Ave. to NE 192nd Ave	2032-2045	$20,000,000
Columbia Shores Blvd. at Columbia Way - BNSF Undercrossing Widening	2032-2045	$30,000,000
NE 59th St. - NE 147th Ave. to NE 162nd Ave	2032-2045	$9,000,000
NE 184th Ave. - NE 4th St. to NE 18th St	2032-2045	$14,000,000
NE 162nd Ave. - SE 1st St. to NE 9th St.	2032-2045	$13,000,000
NE 112th Ave. - E. Mill Plain Blvd. to NE 28th St	2032-2045	$3,000,000
NE 54th Street - NE 15th Ave. to NE Saint James Rd	2032-2045	$14,000,000
NE 104th Avenue - SE Mill Plain Blvd. to NE 14th Street	2032-2045	$12,000,000
NE 104th Avenue - NE 14th Street to NE 18th Street	2032-2045	$12,000,000
E Evergreen Blvd. Bridge Over S Blandford Dr	2032-2045	$15,000,000
NW 32nd Ave./Lower River Rd. Roundabout	2032-2045	$2,000,000
NW 32nd Ave. Freight and Mobility - Lower River Rd. to NW 61st St.	2032-2045	$64,000,000
NW 32nd Ave. Freight and Mobility - NW 61st St. to Burnt Bridge Creek	2032-2045	$49,000,000
NW 32nd Ave. Freight and Mobility - Burnt Bridge Creek to NW 78th St	2032-2045	$10,000,000
MacArthur Boulevard - Blandford Dr. to Lieser Rd	2032-2045	$15,000,000
N. Devine Rd. - E. Mill Plain Blvd. to MacArthur Blvd	2032-2045	$4,000,000
N Andresen Rd. - E. Mill Plain Blvd. to Highland Dr	2032-2045	$10,000,000
MacArthur Blvd. at N. Devine Rd. Roundabout	2032-2045	$1,500,000
MacArthur Blvd. at N. Andresen Rd. Roundabout	2032-2045	$1,500,000
SE 29th St. - SE 176th Ave. to SE 192nd Ave	2032-2045	$10,000,000
St Johns Blvd. and NE 68th St.	2032-2045	$1,000,000
SE McGillivray Blvd. and SE 166th Ave.	2032-2045	$100,000
NE Burton/28th Street - NE Andresen Rd. to NE 138th Ave	2032-2045	$2,000,000
NW Fruit Valley Rd. at La Frambois Rd	2032-2045	$1,000,000
SE 164th Avenue and SE 12th Street Intersection Improvements	2032-2045	$1,000,000
NE 18th Street and NE 172nd Avenue Intersection Improvements	2032-2045	$500,000
St. Johns Blvd. and Fort Vancouver Way Intersection Improvements	2032-2045	$500,000
NE 162nd Avenue and NE 9th Street Intersection Improvements	2032-2045	$500,000
NE 172nd Avenue and NE 9th Street Intersection Improvements	2032-2045	$500,000
SE 192nd Avenue and Mill Plain Blvd. Intersection Improvements	2032-2045	$500,000
Evergreen Hwy. Pathway - Columbia Springs to SE 164th Ave	2032-2045	$7,000,000

Evergreen Hwy. Pathway - SE 164th Ave. to east City Limits	2032-2045	$7,000,000
SE 10th Street Sidewalks - SE 98th Avenue to SE Ellsworth Road	2032-2045	$2,000,000
Westside Bike Mobility	2032-2045	$800,000
NE Fourth Plain Blvd. and Grand Blvd. - Pedestrian Improvement SW Corner	2032-2045	$700,000
NE 9th St. Infill Sidewalk - NE 112th Ave. to NE 136th Ave	2032-2045	$500,000
Amtrak Multimodal Access	2032-2045	$10,000,000
NE Padden Expressway and NE Andresen Rd. Intersection Improvements	2032-2045	$10,000,000
MacArthur Blvd. and S. Blandford Dr. Pedestrian Crossing	2032-2045	$1,000,000
Fruit Valley Rd. and Firestone Lane Pedestrian Crossing	2032-2045	$1,000,000
W. 16th St. and NW Packing Pedestrian Crossing	2032-2045	$1,000,000
SE 164th Avenue - Tech Center Drive to SE 1st Street Safety and Mobility Improvements	2032-2045	$2,000,000
Fourth Plain Blvd. Safety and Mobility - 121st Ave to 127th Ave	2032-2045	$1,000,000
E 18th Street Mobility Lane Improvements and Traffic Calming - Grand Blvd. to NE Burton Rd	2032-2045	$2,000,000
Brandt Rd. Traffic Calming - Fourth Plain Blvd. to E 18th St	2032-2045	$100,000
N Grand Blvd. Traffic Calming - Fourth Plain Blvd. to E 18th St	2032-2045	$100,000
Fourth Plain Blvd. and BBC Trail Crossing Intersection Mural	2032-2045	$100,000
NE Andresen Rd. Sidewalk - NE 78th St. to NE 84th St	2032-2045	$1,000,000
Total 7-20y 2032-2045	**Timeframe (7-20y)**	**$390,900,000**
Total 1-20y 2026-2045	**Timeframe 1-20y**	**$390,900,000**

Parks, Recreation, and Cultural Services		
Project Facility	**Timeframe (1-6y)**	**Cost Estimate**
Renovate the Arts Hub	2025-2029	$17,500,000
Park Acquisition	**Timeframe (2026-2031)**	**Cost Estimate**
Neighborhood Park (South of SR-14)	2029	$922,405
Neighborhood Park (W of 164th, approx. @ 28th)	2026	$844,132
Riparian Natural Areas (Multiple park districts-In holdings, etc)	2026-2031	$145,603
Service Area Expansion, System Wide Multiple park districts	2026-2031	$728,024
Park Development	**Timeframe (2026-2031)**	**Cost Estimate**
Marine - Redesign and Development-Level III	2026-2028	$9,251,649
Vancouver Waterfront_PIF Credits	2026-2031	$728,024
Liberty - Playground replacement/ADA compliance	2026-2027	$229,322
Arnada - Renovation	2026-2027	$606,086
Quarnberg - Renovation	2027-2028	$653,251
John Ball - Renovation	2028-2029	$427,769
Dollie & Ed's - New Park Development	2028-2031	$9,721,773
Columbia Lancaster - Renovation	2026	$534,617
Father Blanchet - Renovation	2026	$534,617
Bagley - Redesign & Development-Level II	2026-2028	$13,683,418
Ellsworth School Park - Planning	2026-2027	$866,923
Burton Ridge - Master Plan & Development-Level III	2027-2028	$832,358
Wintler - Redesign & Development-Level III	2027-2029	$2,009,820
Kelley Meadows - Master Plan & Development-Level III	2027-2029	$1,465,206
David Douglas - Redesign & Development-Level III	2028-2031	$6,900,673
Community Park - New Park Development	2026-2031	$30,998,818
Landover-Sharmel - Development-Level III	2026	$2,025,916
East Image - Master Plan & Development-Level III	2026-2027	$1,028,152
Lauren Park - Development-Level III	2026-2027	$920,666
Homestead - Renovation	2026-2027	$443,788
Burnt Bridge Creek School Park - Renovation	2027-2028	$653,860
Hambleton - Design and Development-Level III	2027-2030	$4,100,108
Skate park - Level III developmen	2028-2029	$1,224,501
Kevanna - Redesign and Development-Level III	2028-2031	$1,272,278
Fir Garden - Completion of MP Improvements	2029-2030	$440,602
Fir Crest - Planning	2029-2031	$967,290

192nd Avenue at Killian/192nd Ave	2029-2031	$771,574
Community Park - New Park Development	2029-2031	$760,283
Wycoff - Master Plan & Development-Level III	2030-2031	$877,872
Healthy Pollinator Landscapes	2026-2031	$182,006
Improved Natural Areas	2026-2031	$364,014
Park Capacity Enhancements/Expansion	2026-2031	$2,184,076
Riparian Natural Areas Enhancements, easements	2026-2031	$244,556
Park Improvements	**Timeframe (2026-2031)**	**Cost Estimate**
NH/COM Parks, as needed	2026-2031	$2,184,076
NH/COM Parks, as needed, parking lot and walkway projects	2026-2031	$364,014
Trails: Planning / Capital Repairs	**Timeframe (2026-2031)**	**Cost Estimate**
Waterfront Connection to Port	2026-2031	$784,299
Columbia River Renaissance Trail	2026	$112,551
Evergreen Hwy. West - Chelsea to Lieser/Wintler (2.2 mi)	2027	$985,383
Evergreen Hwy. East - Ellsworth to 192nd Ave	2031	$1,761,444
Trail and Pedestrian Safety & Planning and Improvements	2026-2028	$69,576
Vancouver Lake Lowland Trails	2026-2031	$902,022
Local connector trails	2026-2031	$55,409
Burnt Bridge Creek Greenway	2030	$1,266,770
Special Facility Development & Improvement	**Timeframe (2026-2031)**	**Cost Estimate**
Marshall/Luepke - Gym Floor Replacement	2026	$135,061
Firstenburg Center - Rebuild/Upgrade Elevator	2026	$196,964
Firstenburg Center - Upgrade Chillers	2026	$252,114
Firstenburg Center - Spa UV Replacement	2026	$56,275
Firstenburg Center - Water Features Replacement	2026	$112,551
Firstenburg Center - Full Slide Replacement	2027	$289,819
Total (1-6y)	**(Timeframe (1-6y)**	**$127,574,358**
Project Facility	**Timeframe (7-20y)**	**Cost Estimate**
Facility - New Community Center	2032-2045	$67,500,000
Park Acquisition	2032-2045	$437,330,000
Park Development	2032-2045	$326,100,000
Urban Plazas and Linear Parks	2032-2045	$43,800,000
Trails Acquisition and Development	2032-2045	$29,620,000
Park Repairs and Improvements	2032-2045	$17,900,000
Facility Repairs and Improvements	2032-2045	$13,720,000

Total (7-20y)	**Timeframe (7-20y)**	**$935,970,000**
Total 20-Year Projects	**Timeframe 1-20y**	**$1,063,544,358**

General Govt Admin		
Project Facility	**Timeframe (1-6y)**	**Cost Estimate**
PRJ083491-Public Works Operations Campus	2026-2029	$225,000,000
PRJ100983-521 Chaklov	2026-2028	$17,085,000
Consolidate City Hall	2030-2034	$11,749,213
City Hall (Ground source heat relocation)	2026-2028	$3,200,000
PRJ101160-Bridge Shelter	2026-2027	$14,200,000
Total	**Timeframe (1-6y)**	**$271,234,213**
Project Facility	**Timeframe (7-20y)**	**Cost Estimate**
Relocate Community Court (if needed)	TBD	TBD
Develop long-term administration facilities plans	TBD	TBD
Total		**TBD**
Total 20-Year Projects	**Timeframe 1-20y**	**$271,234,213**

C-TRAN 20-Year Transit Development Plan 2016-2036 (2009 Dollars)		
Project	**Timeframe (1-6y)**	**Cost Estimate**
Facility Capital Maintenance	2019-2030	$7,740,000
Passenger Amendities	2019-2030	$38,000,000
Miscellaneous Capital Repair/Replacement	2019-2030	$3,000,000
Office Equipment/Computer Systems/Printers	2019-2030	$6,000,000
Fixed Route & Paratransit Coaches	2019-2030	$67,867,000
Major Engine Component Replacements	2019-2030	$1,200,000
Vanpool Vehicle Acquisitions	2019-2030	$1,740,000
Maintenance & Support Vehicles	2019-2030	$1,320,000
Total (1-6y)		**$126,867,000**

Regional Transportation Plan 2024			
Project Facility	**Timeframe**	**Jurisdiction**	**Cost Estimate**
Miscellaneous Capital Repair & Replacement	Ongoing	C-TRAN	$60,018,000
TDM Programs	Ongoing	C-TRAN	$1,000,000
Fleet Replacement & Expansion	Ongoing	C-TRAN	$298,400,000
Transit Enhancements	Ongoing	C-TRAN	$5,250,000
Enhanced Transit: Freeway Operations	2028-2035	C-TRAN	$15,000,000
Enhanced Transit: Spot Improvements	2028-2035	C-TRAN	$5,000,000
Enhanced Transit: Corridors	2028-2035	C-TRAN	$20,000,000
ITS Deployment	Ongoing	C-TRAN	$12,300,000
Park & Ride: East Vancouver/Camas	2036-2045	C-TRAN	$20,000,000
Shared Mobility	2028-2035	C-TRAN	$5,000,000
Transit Oriented Development Program	2028-2035	C-TRAN	$100,000,000
Total			**$541,968,000**

Project Facility	**Timeframe (1-20y)**	**Jurisdiction**	**Cost Estimate**
18th St (97th Ave to NE 107th Ave)	2028-2035	Vancouver	$13,989,000
18th St (142nd Avenue to 162nd Avenue)	2028-2035	Vancouver	$18,000,000
18th St (162nd Ave to 192nd Ave)	2028-2035	Vancouver	$20,000,000
Fruit Valley Freight Access and Safety Improvements Project (SR 501 to NW 61st St)	2028-2035	Vancouver	$64,000,000

Fruit Valley Freight Access and Safety Improvements Project (BBC to NW 78th St)	2028-2035	Vancouver	$10,000,000
Fruit Valley Freight Access and Safety Improvements Project (61st to BBC)	2028-2035	Vancouver	$49,000,000
78th St/Fruit Valley roundabout	2028-2035	Vancouver	$2,000,000
NE 162nd Ave (SE 1st St to NE 9th St)	2028-2035	Vancouver	$11,000,000
192nd Ave (SE 1st St to NE 18th St)	2028-2035	Vancouver	$20,000,000
Andresen Rd/Padden Pkwy	2036-2045	Vancouver	$15,000,000
Andresen Rd/MacArthur Blvd	2028-2035	Vancouver	$2,500,000
Andresen Rd/E Mill Plain Blvd to Highland Dr	2036-2045	Vancouver	$10,000,000
Brady Rd West Extension (192nd Ave interchange to 171st Ave)	2028-2035	Vancouver	$20,500,000
BurtonRd/28th St (NE Andresen Rd to NE 138th Ave)	2028-2035	Vancouver	$1,000,000
Evergreen Highway (Weber Arboretum to 100th Ct)	2028-2035	Vancouver	$15,000,000
Fourth Plain Blvd (E 62nd Ave to Andresen Rd)	2028-2035	Vancouver	$5,000,000
Fourth Plain Blvd (121st Ave to 127th Ave)	2036-2045	Vancouver	$1,000,000
Hazel Dell Ave/BBC Trail crossing	2028-2035	Vancouver	$800,000
Heights Grand Loop (Devine Rd to MacArthur Blvd)	2028-2035	Vancouver	$5,000,000
Jefferson St (Mill Plain to Evergreen)	2028-2035	Vancouver	$10,000,000
Lieser Rd/NE 87th Ave	2028-2035	Vancouver	$6,000,000
MacArthur Blvd (Brandt to Blandford) Complete street eval	2028-2035	Vancouver	$500,000
Main St (Fourth Plain Blvd to City limits) Complete street	2028-2035	Vancouver	$700,000
Mill Plain Blvd (Boise Ave to N Andresen Rd)	2028-2035	Vancouver	$10,000,000
St Johns/NE 68th St Signal	2028-2035	Vancouver	$1,000,000
St Johns/Ft Vancouver Way Signal	2028-2035	Vancouver	$2,800,000
St Johns/St James (Fourth Plain to City limits)Complete street	2028-2035	Vancouver	$1,000,000
SE 5th St (SE 120th Ave to SE 121st Ave)	2028-2035	Vancouver	$550,000
NE 9th St (NE 172nd Ave to 192nd Ave)	2028-2045	Vancouver	$10,000,000
9thSt/11th St (NE 152nd Ave to 162nd Ave)	2028-2035	Vancouver	$3,000,000
SE 10th St (Ellsworth to Chkalov)	2028-2035	Vancouver	$4,000,000
NE 11th/NE 13th (172nd Ave to 192nd Ave)	2028-2035	Vancouver	$4,000,000
NE 15th Ave (SR 500 to Ross St)	2028 - 2035	Vancouver	$2,000,000
E 18th St (Grand Blvd to NE Burton Rd)	2028-2035	Vancouver	$2,000,000
18th St (142nd Avenue to 162nd Avenue)	2028-2035	Vancouver	$18,000,000
SE 20th St/ SE 176th Ave	2028-2035	Vancouver	$500,000
NE 28th St (142nd Ave to 162nd Ave)	2028-2035	Vancouver	$12,000,000

Main St/39th St	2028-2035	Vancouver	$2,000,000
49th St (122nd Ave to 137th Ave)	2028-2035	Vancouver	$10,000,000
54th (15th Ave to St Johns)	2028-2035	Vancouver	$15,000,000
94th Ave (Van Mall Dr to NE 54th St)	2028-2035	Vancouver	$2,500,000
NE 104th Ave (18th St to 14th St)	2028-2035	Vancouver	$10,000,000
NE 104th Ave (Mill Plain to NE 14th St)	2028-2035	Vancouver	$10,000,000
Chkalov Dr (Mill Plain to SE McGillivray)	2036-2045	Vancouver	$1,000,000
Columbia Shores (South of SR 14)	2028-2035	Vancouver	$20,000,000
Devine Rd (E Mill Plain Blvd to MacArthur Blvd)	2028-2035	Vancouver	$4,000,000
Ellsworth (SE 2nd to SE 10th St)	2028-2035	Vancouver	$4,000,000
E Evergreen Blvd Bridge Replacement	2036-2045	Vancouver	$15,000,000
Evergreen Highway (Columbia Springs to 164th Ave)	2028-2035	Vancouver	$5,000,000
Evergreen Highway (164th Ave to City limits)	2028-2035	Vancouver	$7,000,000
MacArthur Blvd/Lieser Rd	2028-2035	Vancouver	$2,800,000
MacArthur Blvd/S Blandford Dr	2028-2035	Vancouver	$750,000
MacArthur Blvd (E Mill Plain to N Lieser Rd) Roundabout	2028-2035	Vancouver	$15,000,000
MacArthur Blvd/N Andresen Rd Roundabout	2028-2035	Vancouver	$1,500,000
MacArthur Blvd (S Lieser Rd/St Helens Ave)	2028-2035	Vancouver	$3,500,000
Section 30: Collector Arterial	2028-2035	Vancouver	$14,400,000
NE Fourth Plain (SR 503 to 137th Ave) Signal timing	2028-2035	WSDOT/Vancouver	$200,000
Total (1-20y)			**$515,489,000**

Vancouver Public Schools

Project Facility	Description	Timeframe (1-6y)	Cost Estimate
Ogden Elementary and Sacajawea Elemenentary	Additional classrooms,s co-op space, parking	2022-2028	$7,425,000
Total			**$7,425,000**

Evergreen Public Schools

Project Facility	Description	Timeframe	Cost Estimate

Note: ESD did not estimate future capital facility needs for 2026-2031

Vancouver Public Libraries

Project Facility	Type	Timeframe
Three Creeks Community Library	Maintenance and Modernization	2026-2028
Cascade Park Community Library	Maintenance and Modernization	2026-2030
Vancouver Community Library	Strategic Investments	2026-2030
Vancouver Mall Library	Strategic Investments	tbd

Total (1-6y)

CITY OF
Vancouver
WASHINGTON

City of Vancouver

EQUITABLE DEVELOPMENT STRATEGY

DRAFT - April 2026

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INTRODUCTION

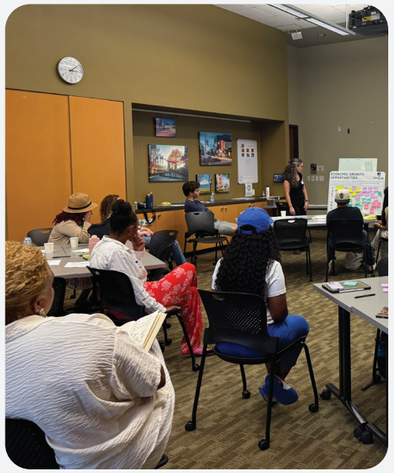
INTRODUCTION

Vancouver stands at a pivotal moment in its growth. As one of the fastest-growing cities in Southwest Washington, Vancouver has experienced significant population increases, demographic shifts, and escalating pressures on housing, infrastructure, and neighborhood stability. While growth has brought opportunity and investment, it has not been experienced evenly. Long-standing inequities rooted in disinvestment and systemic racism continue to shape who benefits from growth and who bears its burdens.

The Equitable Development Strategy is the first citywide framework designed to respond directly to these conditions. It builds upon and explicitly aligns with the City of Vancouver's Equity Analysis (March 2024), the Equity Chapter of the Our Vancouver 2045 Comprehensive Plan, and place-based efforts such as the Fourth Plain for All Investment Strategy (2023) and The Heights Equitable Development Strategy (2023). Collectively, these efforts demonstrate that equitable development must be intentional, data-informed, community-driven, and embedded across City departments and investment decisions. This strategy will act as a coordinating framework that aligns policy, investment, and implementation around a shared commitment: ensuring that Vancouver's growth improves quality of life for those who have been historically marginalized, while preventing displacement, strengthening community stability, and expanding access to opportunity across the city.

Vancouver's history reveals how public policy has shaped unequal outcomes across neighborhoods. This has contributed to persistent disparities in housing access, wealth-building, health outcomes, and environmental exposure. Neighborhoods such as Fruit Valley, Bagley Downs, Maplewood and Meadow Homes, among the city's most culturally diverse areas, have also experienced some of the highest concentrations of poverty, renter households, and displacement risk. Recent demographic and market trends have heightened the urgency for action. Vancouver has become increasingly diverse, with communities of color now comprising over 30 percent of the population. At the same time, housing costs have risen rapidly, renter households face disproportionate cost burdens, and redevelopment pressures are accelerating along key corridors. Without targeted intervention, these trends risk repeating patterns seen in other growing cities, where reinvestment leads to displacement rather than shared prosperity.





Grounding the Strategy in Data, Policy, and Lived Experience

This Strategy is grounded in both quantitative analysis and community knowledge, drawing from the City's Equity Index and Displacement Risk Map to provide a data-driven decision-making foundation for this Strategy. The Equity Index identifies where structural inequities and social vulnerability are most concentrated. The Displacement Risk Map explains how those inequities intersect with housing market pressures over time. When viewed together, these tools move the City beyond a one-size-fits-all approach and toward targeted, place-sensitive responses.

Data alone, however, cannot capture lived experience. Community engagement conducted across multiple initiatives has consistently elevated shared priorities: housing stability, affordable commercial space for small businesses, safe and accessible transportation, culturally responsive public spaces, and meaningful inclusion in decision-making. This Strategy treats community knowledge as expertise and positions residents and community-based organizations as essential partners in implementation.

Equity as an Operational Lens

At its core, the Equitable Development Strategy operationalizes equity as a decision-making lens across City functions, consistent with the City's adopted Equity Framework and its application throughout the Our Vancouver 2045 Comprehensive Plan update. Our Vancouver 2045 is the first comprehensive plan in Vancouver's history to have a direct, intentional focus on equity within its policy work. The goals and actions within this Equitable Development Strategy will implement Our Vancouver 2045's Equity and Inclusion chapter. This Strategy aligns with Our Vancouver and the City's Equity Framework, emphasizing:

- Acknowledgment of historical harms and their present-day impacts
- Prioritization of communities farthest from opportunity
- Transparency and accountability in implementation
- Shared power through sustained community engagement
- Cross-departmental responsibility for equitable outcomes

The Equitable Development Strategy establishes the foundation for coordinated action over time. It is intended to guide how the City prioritizes investments, aligns departmental work, partners with community-based organizations, and evaluates outcomes related to displacement, stability, and access to opportunity. Implementation will require ongoing collaboration, adaptive learning, and continued investment. Success will be measured not only by projects delivered, but by whether residents can remain in their neighborhoods, build wealth, access opportunity, and see themselves reflected in the future of Vancouver.

INTRODUCTION

Community Engagement Process

The City of Vancouver committed to a community-driven engagement process to inform the Equitable Development Strategy and ensure that community priorities directly shaped the goals, actions, and implementation framework of the Strategy. Consistent with equity-centered engagement practices, the City focused on creating meaningful opportunities for participation and prioritizing voices that are often underrepresented in traditional planning processes.

Internal Engagement

In addition to engaging the community, the project team conducted an extensive internal engagement process to ensure the Equitable Development Strategy was both actionable and aligned with departmental expertise, capacity, and responsibilities. Over the course of several months, the project team collaborated with departments across the City of Vancouver to facilitate in-depth conversations about equitable development goals, existing initiatives, and opportunities for alignment. These discussions focused on understanding how equity considerations intersect with departmental work and identifying where policy, programs, and investments could be strengthened or refined.

Following these initial conversations, the project team developed a preliminary outline of the Equitable Development Strategy, including draft goals and proposed actions. This draft was shared with internal departments to:

- Identify actions or perspectives that may be missing;
- Flag areas of duplication or misalignment; and
- Recommend refinements to improve clarity, feasibility, or impact.



External Engagement

External engagement was conducted through a series of facilitated workshops that brought together approximately 40 community champions, including executive directors, community-based organization leaders, educators, tenant advocates, youth participants, and other community members from across Vancouver, Washington. These participants represented a wide range of lived experiences and professional expertise directly connected to housing stability, economic opportunity, education, and community well-being.

The engagement process consisted of two separate three-hour workshops, both facilitated by the project team from the City of Vancouver. Each workshop was structured to support collaborative learning, dialogue, and action-building across all major categories of the Equitable Development Strategy. Participants worked collectively to identify community needs, elevate lived experiences, and propose actionable solutions aligned with the Strategy's equity goals.

During the workshops, participants were asked to:

- Identify challenges and inequities affecting their communities.
- Propose actions and strategies to address those challenges.
- Prioritize actions based on community impact, urgency, and feasibility.

Following the workshops, City staff synthesized all input gathered from participants. This synthesis process identified:

- High priority actions that rose to the top across both workshops.
- Additional community-identified priorities that, while not ranked as top-tier, were recognized as critical to long-term equitable outcomes.

The results of this process directly informed the structure, goals, and actions of the Equitable Development Strategy. The approach used was not treated as advisory alone, but as foundational to the Strategy's development and implementation framework.





INTRODUCTION

Final Engagement and Document Refinement

Feedback from all engagement was used to draft the Strategy, ensuring that community-identified actions and priorities, along with internal expertise meaningfully shaped the document. Once a draft was completed, the project team re-engaged City staff and community workshop participants to ensure the draft Strategy successfully reflected collective input.

This final engagement phase focused on implementation readiness, including:

- Ensuring all input was accurately captured in the draft Strategy.
- Identifying departmental leads or co-leads for all actions.
- Ensuring alignment between the Strategy and existing work plans.

This collaborative approach emphasized shared ownership, cross-departmental accountability, and long-term implementation success. The result is an Equitable Development Strategy that is not only community-informed but institutionally embedded and positioned for sustained action.

As Vancouver continues to grow, this Strategy affirms a clear commitment to growth with intention, guided by data, informed by community experience, and grounded in equity and shared prosperity.

The Equitable Development Strategy responds to this moment by explicitly linking growth management, equity analysis, and implementation. It recognizes that neutrality in policy is not sufficient when starting conditions are unequal. Instead, equity requires intentionally directing resources, attention, and decision-making power toward communities with the greatest need.











INTRODUCTION

How to Use This Document

This document is organized into distinct chapters, each focused on a key area of equity and community development. Each chapter begins with a vision statement and is followed by strategies designed to support that vision. Each action item consists of four parts — the task itself, the relevant Equity Chapter goals it advances, the lead department(s), and its priority level. Where available, definitions, case studies, and exhibits provide additional context and examples to help readers understand the strategies and actions. This structure allows City staff, stakeholders, and community members to easily identify and track relevant strategies and progress as the City of Vancouver moves forward with implementing the Equitable Development Strategy.

Document Chapters

City Best Practices

Equitable Engagement

Place-Based Investments

Economic Development

Housing Equity

Transportation Justice

Sustainability & Climate

Our Vancouver Comprehensive Plan Equity Chapter Goals

Equitable Community: All community members have equitable and inclusive access to opportunities and resources, including communities most impacted by past and present exclusionary practices.

Universal Design & Access: Public spaces, public infrastructure, and public and private buildings are universally designed and meet best practices for accessibility and inclusion.

Focus on Youth & Aging Population: The built environment supports community members from childhood through later life, with families and caretakers benefiting from robust youth programs and accessible childcare, enabling children to excel and parents to actively participate in the workforce. Aging populations benefit from accessible infrastructure, inclusive urban design, accessible housing, and opportunities for social connection.

Transparent and Inclusive Governance: Community members have trust in city government, built and sustained through equitable and inclusive community engagement, equitable access to programs, technology and resources, an emphasis on building trust-based relationships with partners and community members, regular reporting of progress and outcomes, and co-creative and transparent decision-making processes.

CHAPTER KEY

Strategy #

Strategy to support the chapter vision

Actions	Goals	Lead Department	Priority
Actions to implement the strategy	Equity Chapter goals the Action advances	Who will be leading or helping to implement this action	Action priority and whether they are community-identified

If you see this, there's a further explanation of the action on the page, such as a definition, case study, or exhibit.

These actions were identified directly from community members during external engagement.

Community Identified

High

High Priority if Indicated

Actions that were identified by community members and/or City staff as particularly high priorities are marked as "High."



Case Study:

Case studies provide an example

- Case study details

Definition

Learn more about how key terms in this plan are defined.



CHAPTER 1

CITY BEST PRACTICES

VISION

The City will build capacity and provide resources for staff to identify areas of inequity within the city and understand the factors contributing to disparities, so they can design programs and projects that close the gap.

Strategy 1

Increase diversity, cultural competency and cultural humility of City staff.

	Actions	Goals	Lead Department	Priority
1.1.1	Create recruitment and retention strategies to ensure City staff are reflective of the Vancouver community.		Human Resources	**High**
1.1.2	Institute a compensation program for bilingual staff to reflect the additional workload, including interpretation at in-person events and document translation.		Human Resources	
1.1.3	Incorporate City priorities and Equitable Development Strategy goals into recruiting and onboarding programs to ensure new staff enter with a foundational understanding of the City's values around equity and inclusion.		Human Resources	
1.1.4	Improve cultural competency and cultural humility for City staff through active engagement in educational and experiential learning.		Engagement and Access	**High**
1.1.5	Create education and training programs for City staff regarding effective engagement with community members with disabilities.		Engagement and Access	**High**
1.1.6	Formally recognize employees who advance diversity, equity, and cultural competency to celebrate these contributions as a reflection of the City's values through programs such as the V Awards and Access in Action Award.		Engagement and Access	

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated



Cultural Competency

The ability to understand, communicate with, and effectively interact with people across cultures. It encompasses an awareness of one's own cultural worldview, the ability to recognize and appreciate cultural differences, and the skills required to navigate diverse cultural contexts.[1]

Cultural Humility

Cultural humility involves understanding the complexity of identies, incorporates a lifelong commitment to self-evaluation and self-critique, and focuses on developing authentic interactions and relationships. [2]

Diversity

Representative of a range of backgrounds, perspectives, and life experiences.

1. Georgetown University. "Definitions of Cultural Competence." National Center for Cultural Competence. https://nccc.georgetown.edu/curricula/culturalcompetence.html.
2. Lekas, H. M., Pahl, K., & Fuller Lewis, C. (2020). Rethinking Cultural Competence: Shifting to Cultural Humility. Health services insights, 13, 1178632920970580. https://doi.org/10.1177/1178632920970580

Strategy 2

Enhance the City of Vancouver's procurement procedures to be more equitable and inclusive.

	Actions	Goals	Lead Department	Priority
1.2.1	Expand outreach to diverse suppliers, contractors and consultants - including minority-owned, women-owned, veteran-owned, and small and emerging businesses - to educate them on how to participate in the City's procurement process.		Procurement; Economic Prosperity and Housing	
1.2.2	Expand the number of languages that the City's supplier manual and other educational materials are translated into to reduce barriers to participation.		Procurement	
1.2.3	Include social and environmental responsibility criteria for selecting developers for City-owned developments.		Procurement; Economic Prosperity and Housing	
1.2.4	Increase procurements with developers who are more diverse, culturally reflective, accessible and inclusive, and understand the unique needs of BIPOC communities.		Procurement; Economic Prosperity and Housing	
1.2.5	Support mission-driven developers who are focused on equity and accessibility, especially for elderly and disabled residents.		Procurement; Economic Prosperity and Housing	
1.2.6	Identify gaps in service and existing needs for small businesses by partnering with representatives that facilitate current procurement assistance workshops.		Procurement; Economic Prosperity and Housing	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated



Equitable

Fair and just, especially in a way that takes account of and seeks to account for different needs, circumstances, and historical or systematic barriers.

Inclusive

Intentionally creating environments, processes, or decisions where people of all backgrounds and perspectives feel welcomed, respected, and able to participate.

Public Procurements

When the local government purchases goods, services and construction using public funds. Public procurement involves specific rules and regulations to ensure transparency, fair competition, and cost-effectiveness.[3]

3. NIGP: The Institute for Public Procurement. "Dictionary of Procurement Terms." https://www.nigp.org/dictionary-of-terms?letter=p&page=13.

Strategy 3

Use technology and information ethically and equitably.

	Actions	Goals	Lead Department	Priority
1.3.1	Create a standardized checklist for evaluating technology and information systems across City departments. The checklist will be applied collaboratively across departments and assess tool alignment with program goals, examine underlying system assumptions, monitor for expected and unintended outcomes, evaluate equitable performance, and establish a regular re-evaluation cadence.		Information Technology	
1.3.2	Implement Digital Accessibility under the Language Access Plan.		Engagement and Access; Communications	
1.3.3	Provide artificial intelligence (AI) training to address technology bias and encourage critical engagement with emerging digital tools.		Information Technology	

Digital Accessibility

Websites, tools, and technologies are designed and developed so that people with disabilities can use them. A website is accessible when it is easy to see or hear, easy to use, easy to understand, and works well with different devices and assistive tools.[4]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

Strategy 4

Fund and create internal structures needed to implement the Equitable Development Strategy and other equity-based plans.

	Actions	Goals	Lead Department	Priority
1.4.1	Every department shall create and maintain an equity team to ensure equity is integrated into every aspect of their work.		Engagement and Access	
1.4.2	Maintain a permanent ADA Coordinator full-time employee.		Engagement and Access	
1.4.3	Maintain permanent staff in the Community Development Department Comprehensive Planning Division to coordinate and advance Equitable Development Strategy priorities and initiatives.		Community Development	
1.4.4	Fund and implement the priorities that are highlighted in the ADA Transition Plan.		Engagement and Access; General Services	
1.4.5	Address disparities of outcomes of complaint-based systems.		Engagement and Access	

The Americans with Disabilities Act (ADA)

The Americans with Disabilities Act. A federal civil rights law that prohibits discrimination against individuals with disabilities in everyday activities. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.

4. UC Berkeley. "Digital Accessibility." Digital Accessibility Program. https://dap.berkeley.edu/web-a11y-basics/what-digital-accessibility.

Strategy 5

Create a repository for all equity-based data and maps to be publicly accessed.

	Actions	Goals	Lead Department	Priority
1.5.1	Create an equity atlas to compile all spatial, demographic information and equity-based data. This should initially include the Equity Index Map, Displacement Risk Map, Transit Dependency Map, and other maps referenced in this strategy. Other relevant maps will be added as they are created.		Community Development	**High**
1.5.2	Utilize GIS to map geographic disparities in income, housing, healthcare access and other key indicators as needed.		Community Development; Engagement and Access	**High**
1.5.3	Develop and maintain a database of housing availability, market costs, and community need based on household income distribution, and expected cost to deliver units to inform housing policy, incentives, and priorities as market conditions change.		Economic Prosperity and Housing	**High**
1.5.4	Maintain a citywide dashboard to track and display key performance indicators that are updated at regular intervals and show progress over time.		Community Development; Information Technology	**High**

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

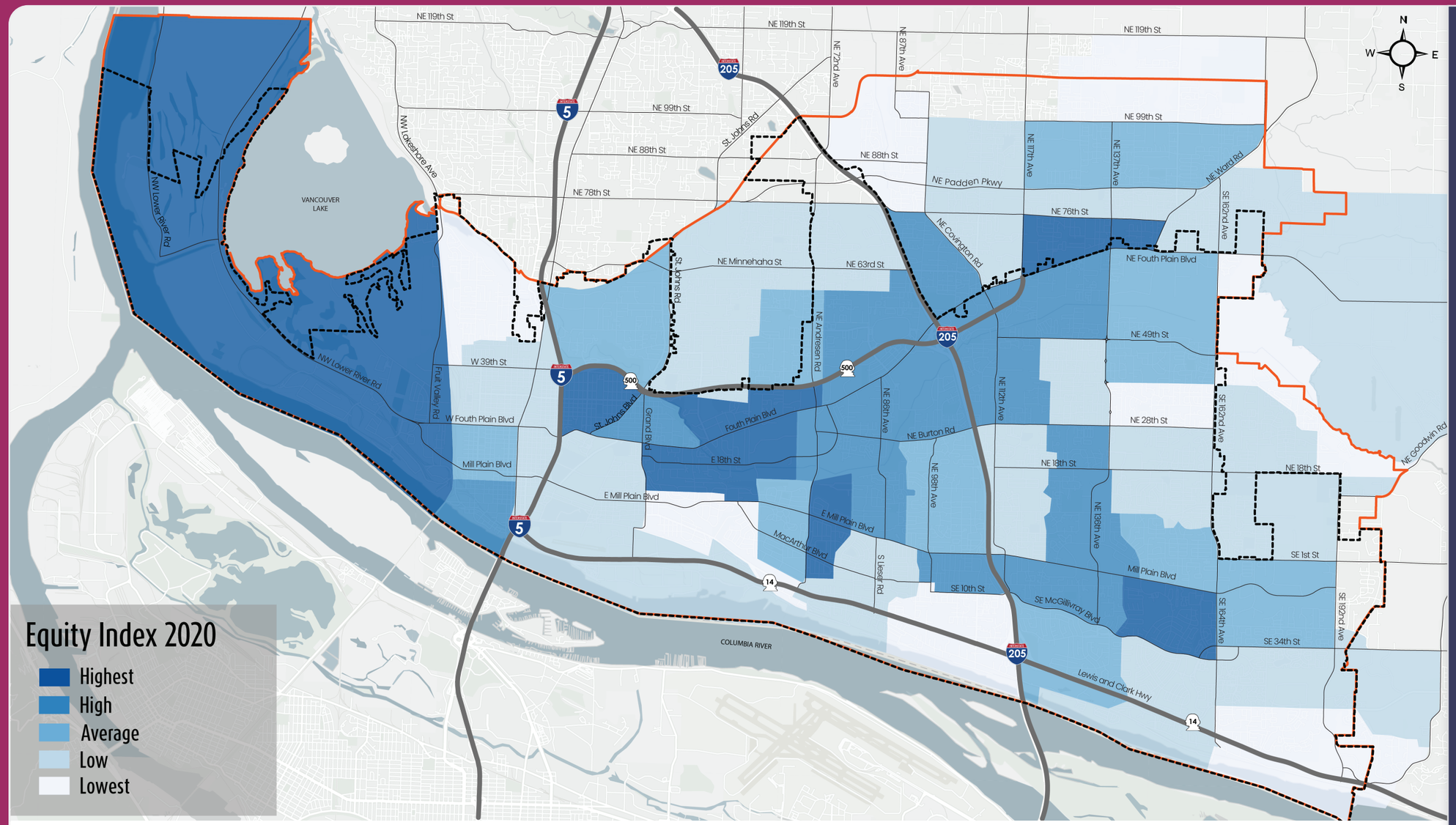
Community Identified | High Priority if Indicated



Geographic Information System (GIS)

A computer system that analyzes and displays geographically referenced information. It uses data that is attached to a unique location.[5]

5. USGS. "What is a Geographic Information System (GIS)?." USGS. Last updated January 29, 2025. https://www.usgs.gov/faqs/what-a-geographic-information-system-gis.



Equity Index 2020

- Highest
- High
- Average
- Low
- Lowest

Legend

- City Boundary
- Utility Service Boundary
- Major Arterials

County of Clark, WA, Oregon Metro, Oregon State Parks, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/ NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

0 0.5 1 Miles

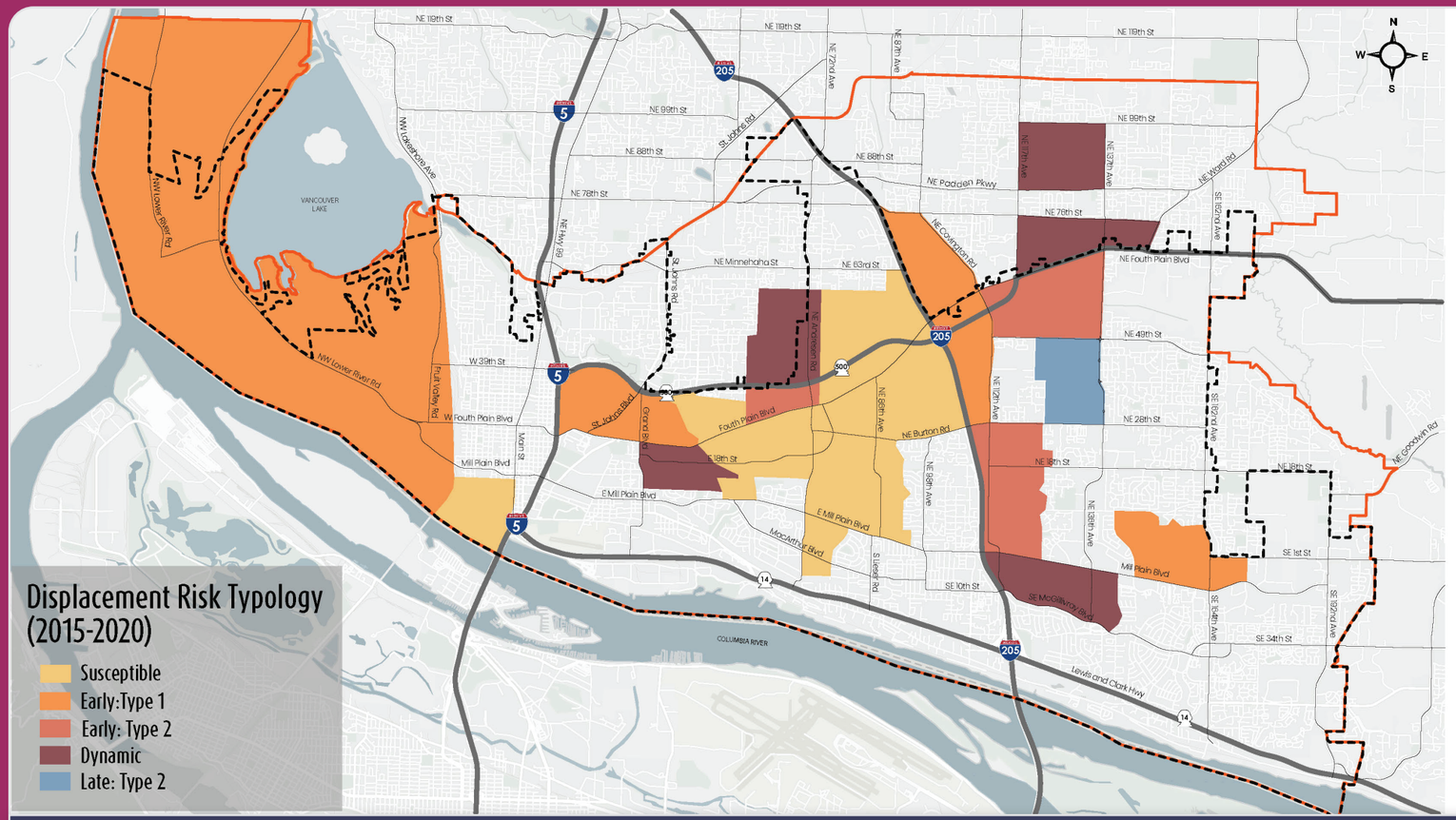
CITY OF Vancouver WASHINGTON

Equity Index Map

The City of Vancouver's Equity Index Map highlights equity priority areas in the city based on concentrations of multiple indicators such as race, income, housing status, age, disability, education, and English proficiency. The City will use this map to identify priority investment areas, tailor program offerings for specific communities, and better understand opportunities to advance social and economic equity across the city. These maps are most powerful when paired with authentic community engagement that integrates community values, priorities, and lived experiences to holistically inform policy and funding decisions.

This map highlights neighborhoods in darker blue areas, referred to as equity priority areas, where targeted investments and resources could have the greatest impact on building community resilience and equity.

6. "Vancouver Equity Risk Weighting Tool." City of Vancouver. October 1, 2022. https://city-of-vancouver-wa-geo-hub-cityofvancouver.hub.arcgis.com/documents/00e816c210d540b686e64cdaa9ff02dc/about



Seven Displacement Risk Neighborhood Typologies

Typology	Vulnerable Population?	Demographic Change?	Housing Market Condition
Susceptible	Yes	No	Adjacent
Early: Type 1	Yes	No	Accelerating
Early: Type 2	Yes	Yes	Adjacent
Dynamic	**Yes**	**Yes**	**Accelerating**
Late: Type 1	Yes	Yes	Appreciated
Late: Type 2	Used to be in 2000 or in year 1	Yes	Accelerating
Continued Loss	Used to be in 2000 or in year 1	Increasing share of white residents and adults with a four-year degree	Appreciated

Legend

City Boundary | Utility Service Boundary | Major Arterials | 0 0.5 1 Miles

County of Clark, WA, Oregon Metro, Oregon State Parks, State of Oregon GEO, WA State Parks GIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/ NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Displacement Risk Map

A Displacement Risk Map identifies where communities may be most vulnerable to being forced out of their homes or neighborhoods due to economic or social pressures. It combines multiple indicators such as changes in housing costs, income levels, and demographic changes to highlight areas at higher risk of displacement. It does not predict neighborhood outcomes, but reveals patterns and concentrations of risk across a geographic area. Displacement risk maps are often used to guide planning and policy decisions such as where to prioritize tenant protections, affordable housing investments, and anti-displacement policies to promote more stable, inclusive, and resilient neighborhoods.

The Displacement Risk Map shown above indicates census tracts that may be experiencing accelerated patterns of displacement that could potentially be mitigated through anti-displacement measures and interventions.

Strategy 6

Assess impacts of projects and programs.

	Actions	Goals	Lead Department	Priority
1.6.1	Create a standard impact assessment framework that equips City staff to evaluate the effects of policies and development initiatives on all community groups. This framework will support the Vancouver for All initiative by guiding decision-making with the aim of eliminating barriers and promoting opportunities for all residents.		Engagement and Access	**High**
1.6.2	Conduct impact assessments on all new projects and programs once a standard impact assessment framework is created.		All Departments	**High**
1.6.3	Periodically evaluate ongoing projects and programs to assess their effectiveness and impact across all community groups, ensuring benefits are broadly shared and unintended consequences are identified and addressed.		All Departments	**High**
1.6.4	Create and implement a neighborhood-specific survey to help us understand the nuances that exist within our community and identify ways to make our programs and services more welcoming and accessible for everyone.		Engagement and Access	**High**

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | **High** High Priority if Indicated



Case Study:

Vancouver for All Initiative

Vancouver for All is a transformative initiative designed to create a connected community where all residents feel a sense of belonging and where barriers to participation and success are removed. This approach aligns with the City's core values of collaboration, innovation, and empowerment.

- **Collaboration:** Vancouver for All emphasizes working together to integrate varying perspectives and ensure that the voices of all groups, especially those underserved, are considered in the decision-making process.
- **Innovation:** Recognizing a one-size-fits-all approach does not work when addressing the diverse needs of community, this initiative will utilize innovative strategies tailored to the specific challenges faced by different groups.
- **Empowerment:** The City will establish goals that will be measurable, allowing for transparency and accountability. Regular assessments and feedback loops will be built into the initiative to monitor progress and make necessary adjustments.

Three approaches will be taken to implement Vancouver for All:

- **Targeted professional development** to provide staff with the knowledge and skills to equip them to recognize and address barriers within their team's work environments to better serve all communities throughout the city.
- **Tailored resources and support**, such as mentorship programs, accessibility enhancements for community services, and targeted outreach initiatives that aim to eliminate barriers and promote opportunities for all residents.
- **Community engagement and feedback** through surveys, focus groups, and town hall meetings will be central to Vancouver for All. This will help identify specific barriers faced by all community groups, allowing the city to adapt its strategies effectively.



CHAPTER 2

EQUITABLE ENGAGEMENT & RELATIONSHIP BUILDING

VISION

City staff will engage community stakeholders early and often to ensure that projects and initiatives reflect the needs, concerns and aspirations of all city residents.

Strategy 1

Provide City staff with education and resources to build capacity for authentic, equitable community engagement.

	Actions	Goals	Lead Department	Priority
2.1.1	Create a framework to guide City staff in building ongoing, relationship-based community engagement that goes beyond project-specific outreach. The framework will at a minimum include stakeholder mapping, a needs assessment, and best practices.		Engagement and Access; Communications	**High**
2.1.2	Use stakeholder mapping to identify key stakeholders from diverse community segments, including marginalized groups, to ensure broad representation.		Engagement and Access; Communications	**High**
2.1.3	Create a toolkit for staff regarding inclusive engagement with the disability community.		Engagement and Access	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | **High** High Priority if Indicated



Stakeholder Mapping

The process of identifying individuals, groups, and organizations affected by or influential to a project and analyzing their interests, power, and relationships to inform approaches to engagement and communications.[7]

7. John Hopkins University. "Stakeholder Mapping." Resources. https://imagine.jhu.edu/resources/stakeholder-mapping/.

Strategy 2

Create and maintain relationships with communities that have been historically underserved.

	Actions	Goals	Lead Department	Priority
2.2.1	Engage the community early in the process of developing any project, program, or policy.		All Departments	
2.2.2	Equitably engage the community to better understand community needs. Conduct surveys, focus groups, and community meetings to gather community input. Prioritize inclusivity by providing interpretation services and holding meetings at accessible times and locations.		All Departments	
2.2.3	Create community liaison positions within the city to build and maintain deep relationships through collaboration with community leaders.		Engagement and Access	
2.2.4	Rotate City staff schedules and locations to meet communities where they are, increasing visibility and accessibility.		All Departments	
2.2.5	Advance equity and transparency by hosting inclusive community connection events with City staff.		All Departments	
2.2.6	Improve accessibility of City communications and digital platforms, aiming to meet or exceed web accessibility standards.		Communications	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated



Case Study:

Community Liaison Program at the City of Seattle

The Community Liaison Program is run by the Department of Neighborhoods and was created to help the City do a better job of engaging with and serving historically underserved communities in Seattle.[8]

Community Liaisons are independently contracted and act as a neutral bridge between historically underserved communities and city government, ensuring these groups have access to information, resources, and decision-making power.[9]

8. City of Seattle. "Community Liaisons." Neighborhoods. https://www.seattle.gov/neighborhoods/community-connections/community-engagement/community-liaisons.
9. City of Seattle. "Celebrating 15 years of the Community Liaison Program and honoring those who have served since the beginning." Front Porch. https://frontporch.seattle.gov/2024/09/18/celebrating-15-years-of-the-community-liaison-program-and-honoring-those-who-have-served-since-the-beginning/.

Strategy 3

Increase diversity of Boards and Commissions to better reflect the community as a whole.

	Actions	Goals	Lead Department	Priority
2.3.1	Increase outreach about Boards and Commissions to more intentionally engage with underrepresented residents.		City Manager's Office	
2.3.2	Address barriers to participation and create ways to build individual capacity for residents to step into Board and Commission roles.		City Manager's Office	
2.3.3	Actively recruit Board and Commission members from underrepresented communities when vacancies arise to ensure Boards represent the community.		City Manager's Office	
2.3.4	Provide community education around Boards and Commissions and their role in developing policies and large investments.		City Manager's Office	

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated



Boards and Commissions

Formal groups appointed or created by a government or organization to provide guidance, oversight, or decisions on specific policy areas, programs, or community issues.[10]

10. Priya Elangovan. "The Importance of Boards and Commissions." All In Together. https://aitogether.org/the-importance-of-boards-and-commissions/.

Strategy 4

Build the capacity of neighborhood associations to reflect and engage all Vancouver residents.



Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated | High

	Actions	Goals	Lead Department	Priority
2.4.1	Encourage community building outside of formal neighborhood association meetings.		Office of Neighborhoods	
2.4.2	Provide funding and technical assistance for neighborhood events, projects, and programs.		Office of Neighborhoods	
2.4.3	Support neighborhood engagement across age, race, ethnicity, language, ability and religion.		Office of Neighborhoods	
2.4.4	Facilitate partnerships between neighborhood associations and other community groups.		Office of Neighborhoods	
2.4.5	Support neighborhood associations to find and implement creative ways to foster a sense of belonging in their neighborhoods.		Office of Neighborhoods	
2.4.6	Update and fill-in neighborhood boundaries, so that all Vancouver community members are represented by a neighborhood association.		Office of Neighborhoods	
2.4.7	Revamp neighborhood action plans, allowing neighborhood associations to easily document and share their hopes for the future.		Office of Neighborhoods	
2.4.8	Develop a yearly training program to: • Empower neighborhood leaders • Support equitable and inclusive neighborhood engagement • Improve neighborhood communication • Encourage improved financial management practices • Cultivate and support the next generation of neighborhood leaders		Office of Neighborhoods	

Neighborhood Association

A voluntary organization of residents to advocate for local interests and improvements, address neighborhood issues, and collaborate with local governments and residents within a designated neighborhood.[11]

Community Building

Community building is the intentional process of fostering trust, connections, and inclusive spaces where all residents, especially those historically excluded, feel a sense of belonging, shared ownership, and collective investment in one another's wellbeing.

11. The Policy Circle. "Neighborhood Associations Guide." Policy Insight. https://www.thepolicycircle.org/minibrief/neighborhood-associations/.

Strategy 5

Engage with Tribal Community Members.

	Actions	Goals	Lead Department	Priority
2.5.1	Foster meaningful partnerships with Tribal communities and original stewards of the land we currently occupy, integrating their knowledge, priorities, and cultural perspectives into local decision-making processes.		City Manager's Office; Engagement and Access	

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated





CHAPTER 3

PLACE-BASED INVESTMENTS

VISION

The City will identify underserved areas where focused resources are needed to enhance quality of life.

Strategy 1

Use the Equity Atlas to identify strategic locations where additional resources are needed to enhance quality of life.

	Actions	Goals	Lead Department	Priority
3.1.1	Utilize the City's Equity Index and Displacement Risk Maps to prioritize infrastructure, housing, and public service investments in historically underserved neighborhoods.		Community Development	
3.1.2	Update the City's Equity Index and Displacement Risk Assessment and establish equity priority areas in need of focused, place-based investments every 5 years.		Community Development	
3.1.3	Conduct an existing conditions report on areas prioritized for place-based investments. The existing conditions report will include infrastructure, community character, social and economic conditions, comprehensive demographic analysis, land use, public facilities and services, and environmental factors at a minimum.		Community Development	

Equity Priority Communities

Communities or geographic areas identified as historically underserved that would most benefit from increased support and resources.

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated

Strategy 2

Support equitable growth in identified neighborhoods that enhances well-being without displacement.

	Actions	Goals	Lead Department	Priority
3.2.1	Focus wealth building strategies from the Economic Development and Housing chapters (4 and 5) along transit corridors and in equity-priority areas.		Economic Prosperity and Housing; Community Development	
3.2.2	Implement actions listed in the Economic Development and Housing chapters (4 and 5) in areas experiencing growth and/or large upcoming capital projects. Equitable development and anti-displacement interventions should be implemented as far in advance of large capital projects as possible to foster resilient communities and minimize displacement risk.		Economic Prosperity and Housing	
3.2.3	Include opportunities for community ownership in City-led developments.		Economic Prosperity and Housing	
3.2.4	Include commercial buyback options in City-led development projects to allow the City to solely purchase, or purchase with community partners, new retail to utilize or achieve other equity goals.		Economic Prosperity and Housing	
3.2.5	Leverage City-owned land and infrastructure investments to advance economic development, housing, transit, and climate goals.		Economic Prosperity and Housing	High
3.2.6	Target City incentives and programs to promote affordable and community benefiting development in equity priority areas.		Economic Prosperity and Housing	

Commercial Buyback Option

A commercial buyback option gives the City, or a community partner, the right to purchase commercial space within a new development after it has been built. By owning the retail space, the City can prioritize social outcomes over maximum profit. Commercial buyback options also allow for a broader range of uses (small-scale manufacturing, shared distribution, retail, etc.).

Strategy 3

Design public spaces to be safe, accessible, inclusive, and reflective of Vancouver's diversity.



Public Spaces

Public spaces are publicly accessible places — including parks, streets, sidewalks, libraries, and commercial areas — where people gather, connect, and engage in community life.

Community Help Hub

A community help hub is a central location where community members can easily access resources and services or get connected to where those services are available elsewhere.[12]

Crime Prevention Through Environmental Design (CPTED)

An approach that uses thoughtful design of buildings, streets, and public spaces to reduce crime in ways that make them feel safer and help discourage crime. This can include adequate lighting, clear sight lines, and active, welcoming spaces where people naturally watch out for each other.[13]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

	Actions	Goals	Lead Department	Priority
3.3.1	Involve local residents and community organizations in the design of public spaces to help meet the needs of diverse communities and affirm their history, present and future in the city. Public spaces shall incorporate cultural assets, history, and placemaking that reflect the communities they serve.		Community Development; Economic Prosperity and Housing; Parks, Recreation and Cultural Services; General Services	
3.3.2	Identify capital and infrastructure investments to advance multiple goals and benefit the local community, including through strategic partnerships.		Community Development; Economic Prosperity and Housing; General Services; Public Works	
3.3.3	Engage impacted communities in the planning and implementation of large City-funded redevelopment, park, and public space projects through inclusive and culturally responsive engagement processes.		Community Development; Economic Prosperity and Housing; Parks, Recreation and Cultural Services; General Services	
3.3.4	Facilitate universal design, pedestrian safety, and other accessibility criteria for public spaces, such as streets, sidewalks, parks, and commercial areas.		Community Development; Economic Prosperity and Housing; Parks, Recreation and Cultural Services; Public Works	
3.3.5	Create a Community Help Hub in central Vancouver. This action had the strongest support during workshops with community.		Community Development; Economic Prosperity and Housing	High
3.3.6	Integrate Crime Prevention Through Environmental Design (CPTED) to improve safety outcomes of public spaces. Hostile architecture should not be included as CPTED design elements.		Community Development, Economic Prosperity and Housing, Parks, Recreation and Cultural Services	

12. Laurie Pferr. "Community Care Hubs: What Evidence-Based Program Providers Need to Know. "National Council on Aging." https://www.ncoa.org/article/community-care-hubs-what-evidence-based-program-providers-need-to-know/.
13. National Crime Prevention Council. "Crime Prevention Through Environmental Design Guidebook." Readiness and Emergency Management for Schools. https://www.humanitarianlibrary.org/sites/default/files/2020/09/SNCPC%202003%20Crime%20prevention%20thru%20environmental%20design.pdf.

Strategy 4

Enhance accessibility of services.

	Actions	Goals	Lead Department	Priority
3.4.1	Conduct Service Mapping to identify areas lacking essential services and prioritize improvements in identified “service deserts”.		Community Development; Economic Prosperity and Housing	**High**

Service Mapping

Mapping existing services to see where there are gaps, sometimes called “service deserts”, to guide decision making and prioritize improvements. Service mapping can also be used to help the public navigate services.[14]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated



Strategy 5

Advance health equity by broadening access to essential health services in underserved neighborhoods to address environmental causes of place-based health disparities.

	Actions	Goals	Lead Department	Priority
3.5.1	Incentivize affordable and healthy food businesses, and other businesses that support healthy living, to locate in equity priority areas.		Economic Prosperity and Housing	
3.5.2	Work with non-profit organizations, by-for organizations, and local healthcare providers to expand healthcare access and culturally competent healthcare, including mental health services, prioritizing facilities in equity priority areas for accessible and inclusive care.		Community Development; Economic Prosperity and Housing	

Health Equity

When everyone has a fair and just opportunity to attain their full potential for health and well-being regardless of social, economic, demographic, geographic, or other differences.[16]

14. Australian Government. Service Mapping 101. Policy Projects and Taskforce Office. https://www.apsacademy.gov.au/sites/default/files/2024-07/Service%20Mapping%20101%20Guide%20-%20accessible%20version.pdf.
15. National Digital Inclusion Alliance. “Digital Inclusion 101.” https://www.digitalinclusion.org/digital-inclusion-101/.
16. World Health Organization. “Health Equity.” Health Topics. https://www.who.int/health-topics/health-equity#tab=tab_1.



CHAPTER 4

ECONOMIC DEVELOPMENT & WORKFORCE EMPOWERMENT

VISION

The City will create a thriving, dynamic business environment where entrepreneurs from all backgrounds, including those historically underserved, can reach their full potential and create living-wage jobs throughout Vancouver.

Strategy 1

Support underrepresented businesses from start to sustainability.



Community Investment Trust (CIT)

CITs allow neighborhood residents and other community members–often with low or moderate incomes–to buy small, affordable shares in a commercial or community-owned property. They are for-profit organizations that help people invest in their own neighborhood, build wealth, strengthen local ownership, and keep economic benefits within a neighborhood.[17]

Neighborhood Business Incubators (NBIs)

NBIs help businesses launch and grow by providing free or low-cost workspace, training, mentorship, access to investors, and in some cases, working capital.[18]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

	Actions	Goals	Lead Department	Priority
4.1.1	Utilize City-controlled real estate to provide affordable commercial leasing opportunities for small and emerging businesses.		Economic Prosperity and Housing	
4.1.2	Support the growth and expansion of culturally specific businesses to help increase access to cultural goods and services for all residents.		Economic Prosperity and Housing	
4.1.3	Improve accessibility of small business programs through equitable outreach and multilingual implementation.		Economic Prosperity and Housing	
4.1.4	Facilitate affordable commercial space to support small or locally owned businesses and increase economic opportunities. This may include code changes, negotiated development agreements, master leasing arrangements, supports for tenant improvements, shared amenities, etc.		Economic Prosperity and Housing; Community Development	
4.1.5	Reframe the narrative around historically underserved neighborhoods by actively promoting their strengths and culture.		Economic Prosperity and Housing; Communications	
4.1.6	Support Community Investment Trusts (CIT) and other opportunities for commercial ownership. Give local small businesses collective ownership over their physical location and provide an investment opportunity for individuals with low incomes.		Community Development; Economic Prosperity and Housing	
4.1.7	Help small businesses and microenterprises access capital and build assets. Activities could include forming a partnership with a microfinance organization, facilitating low-cost loans, or encouraging small business owners to set up Individual Development Accounts (IDAs).		Economic Prosperity and Housing	
4.1.8	Explore creative funding options to fund CBOs, anti-displacement strategies, community events, equitable community development programs, etc. This could include taxing high risk retail clusters.		Community Development; Economic Prosperity and Housing	
4.1.9	Expand the Fourth Plain for All (FPFA) small business revolving loan fund citywide.		Economic Prosperity and Housing	
4.1.10	Direct technical assistance and business support resources to underrepresented businesses, including skill-building opportunities and other tailored services.		Economic Prosperity and Housing	
4.1.11	Fund Neighborhood Business Incubators. NBIs are a type of affordable shared commercial space that provide both a physical location and programmatic business development support for entrepreneurs.		Economic Prosperity and Housing	

17. Anti-Displacement Network. "Community Investment Trusts." About. https://antidisplacement.org/tool/community-investment-trusts/.
18. Anti-Displacement Network. "Neighborhood Business Incubators." About. https://antidisplacement.org/tool/neighborhood-business-incubators/.



Case Study:

Fourth Plain For All (FPFA)

Fourth Plain For All is a community-driven investment strategy approved by Vancouver City Council in November 2023, co-created with Fourth Plain residents, workers, and students to reflect a shared vision for central Vancouver neighborhoods.[19]

Vision statement: *Through continued investment, the people who live, work, and go to school in our community are healthy, safe, and have greater access to opportunities. Our ties to one another are strengthened through spaces to celebrate diverse cultures. People feel safe and are safe — whether walking, taking the bus, or visiting a park. Our neighborhoods are not only a local hub, but an international district that people love to visit — a Fourth Plain For All.*

A 10-Year Strategy with Immediate Action [20]

The FPFA strategy was born out of a rare and significant opportunity: $25 million in American Rescue Plan Act (ARPA) funding dedicated to central Vancouver neighborhoods. Rather than determining how to spend those dollars without community input, the City worked with Fourth Plain community members to identify near-term priorities for ARPA investment while simultaneously developing a broader 10-year roadmap to guide future investment in the area.

Together, the community identified more than 40 actions — spanning Housing, Community Building & Public Health, Parks & Public Space, Transportation & Safety, and Economic Development — prioritizing those most urgent for immediate ARPA funding while charting a course for long-term investment in the years ahead.



Case Study:

Fourth Plain Community Commons Project

- Fourth Plain Community Commons is a mixed-use development located on Fourth Plain Boulevard that is designed to serve the community with flexible event spaces, commercial kitchen incubators, office spaces, and more.[21]
- The building opened in September 2023, and includes affordable housing on the upper floors and flexible community-serving spaces on the ground floor. Community space elements include:
  - A commercial kitchen incubator to launch and support emerging food-based businesses;
  - A shared office space to co-locate services to make it easier for residents and businesses to access resources;
  - A community event space that can be rented for festivals, birthdays, etc.; and
  - A public plaza with infrastructure to support a market, food trucks, or other events.
- The development was funded though federal, state, and local fundings sources and partnerships.

19. City of Vancouver. "Fourth Plain for All." Equitable Development Planning. https://www.cityofvancouver.us/business/planning-development-and-zoning/equitable-development-planning/fourth-plain-for-all/.
20. City of Vancouver. "Fourth Plain for All Community Grant Program." Equitable Development Planning. https://www.cityofvancouver.us/business/planning-development-and-zoning/equitable-development-planning/fourth-plain-for-all-community-grant/.
21. City of Vancouver. "Fourth Plain Community Commons." Equitable Development Planning. https://www.cityofvancouver.us/business/planning-development-and-zoning/equitable-development-planning/fourth-plain-community-commons/.

Strategy 2

Extend small business support to home-based microenterprises.

	Actions	Goals	Lead Department	Priority
4.2.1	Invest time and resources in community outreach to engage home-based businesses.		Economic Prosperity and Housing	**High**
4.2.2	Review City's Development Code for barriers to establishing or operating home-based businesses.		Community Development	**High**



Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated



Strategy 3

Support workforce development programs to increase access to quality jobs.

	Actions	Goals	Lead Department	Priority
4.3.1	Bring together employers, labor representatives, workers, job training partners, funders, and workforce development boards that specialize in a specific industry to address local workforce needs.		Economic Prosperity and Housing	
4.3.2	Increase access to existing job training, entrepreneurial services, and technology for under-represented communities. This should include hiring a workforce navigator to improve utilization of existing job training services in a specific area that is tailored to that community.		Economic Prosperity and Housing	
4.3.3	Partner with area schools to support people in gaining skills needed to access jobs.		Economic Prosperity and Housing	
4.3.4	Attract and support industries and companies to boost the number of living wage jobs at multiple levels of education and/or experience.		Economic Prosperity and Housing	

Strategy 4

Increase access to childcare.

	Actions	Goals	Lead Department	Priority
4.4.1	Provide specialized support for home-based childcare businesses.		Economic Prosperity and Housing	**High**
4.4.2	Address City regulations that make developing childcare facilities difficult and/or more expensive.		Community Development	**High**
4.4.3	Explore funding mechanisms, support programs and partners, and utilize City-owned properties to increase the number of childcare facilities and improve their affordability and accessibility for all Vancouver residents.		Community Development; Economic Prosperity and Housing	**High**
4.4.4	Research and adapt strategies from other cities to improve childcare workforce recruitment, retention, and wages, and better support working families and caregivers.		Community Development; Economic Prosperity and Housing	

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated





CHAPTER 5

HOUSING EQUITY & DISPLACEMENT RISK

VISION

All residents have access to safe, affordable housing and protections against displacement.

Strategy 1

Expand protections and programs aimed at improving housing safety, security, and reducing displacement.

Displacement

Involuntary relocation of households and businesses from their neighborhoods due to rising costs, redevelopment, or changing neighborhood conditions. For instance, displacement can happen when rents or housing costs become too high for existing residents to afford, forcing them to leave the neighborhood, often far away from jobs, services, and culturally-specific amenities in order to find more affordable housing.[22]

Rental Assistance Programs

Programs that provide temporary financial aid to help with rent and utility payments. These programs are typically for residents with low-income who face a threat of eviction.[23]

Community-Based Organizations (CBO)

Local organizations, often nonprofits, that provide services, advocacy, and resources to meet the specific needs and priorities of a particular community for issues like housing, education, health, environment, etc.[24]

Tenant Protection Enhancements

New policies that increase tenant protections. These policies can include protections like limits on the reasons for which a landlord can evict a tenant or laws strengthening code enforcement and habitability standards.[25]

	Actions	Goals	Lead Department	Priority
5.1.1	Improve distribution of emergency rental assistance programs to provide greater access for BIPOC and immigrant communities. Build capacity of culturally specific community-based organizations (CBOs) to administer available funding.		Economic Prosperity and Housing	
5.1.2	Enhance tenant protections by expanding legal protections for renters to reduce and mitigate high costs of displacement. The City should eliminate junk fees and other cost barriers that drive up rental prices and create inequitable access for residents with lower income.		Economic Prosperity and Housing	**High**
5.1.3	Support tenants facing eviction. This may include incorporating pre-eviction mediation when feasible, tracking eviction actions to inform policy decisions and identify patterns of concern, and developing programs and partnerships to connect tenants with resources, support and information throughout the eviction process - recognizing that an eviction filing can affect a renter's record regardless of outcome.		Economic Prosperity and Housing	**High**
5.1.4	Reduce emissions within residential buildings. This could include incentivizing the installation of ventilation systems or building air intake away from street-level pollution sources and planting large form trees between the building and street.		Community Development	
5.1.5	Disperse transitional housing throughout the City and offer grants to offset complexities for specific populations.		Economic Prosperity and Housing	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

22. Carson Bridges and Steve Butler. "Dealing with Housing Displacement in Your Comprehensive Plan". Municipal Research and Services Center. https://mrsc.org/stay-informed/mrsc-insight/may-2024/housing-displacement.
23. Center on Budget and Policy Priorities. "Federal Rental Assistance." Policy Basics. https://www.cbpp.org/research/housing/federal-rental-assistance.
24. Public Input. "What is a Community Based Organization?." Dictionary. https://publicinput.com/wp/dictionary/what-is-a-community-based-organization-cbo/.
25. National Low Income Housing Coalition. "States Introduce Multiple Tenant Protections Bills This Legislative Session, Securing Several Wins for Renters Rights." Resources. https://nlihc.org/resource/states-introduce-multiple-tenant-protections-bills-legislative-session-securing-several.

Strategy 2

Preserve the existing stock of affordable housing to maintain the available housing options for residents of lower economic means.

Rental Registration Program

A program that requires all rental properties to register with the City and receive a permit demonstrating habitability of the unit and code compliance. The program would create a database of all rental properties in the city.[26]

Manufactured Home Parks (MHPs)

A site containing spaces that are leased for the long-term placement of manufactured homes. These are commonly known as Mobile Home Parks, but are also referred to as Manufactured Dwelling Parks due to changes in federal regulations around mobile and manufactured homes.[27]

Right of First Refusal Program

This program gives certain groups the first chance to buy a property before it is on the open market. For example, a Community Land Trust could get the first opportunity to purchase a home. The owner must offer the property to the CLT before offering it to anyone else.[28]

Transitional Housing

Temporary housing with supportive services to individuals and families experiencing homelessness with the goal of providing stability and support as the individual or family successfully moves to and maintains permanent housing.[29]

	Actions	Goals	Lead Department	Priority
5.2.1	Continue implementation of the Rental Registration Program by maintaining a comprehensive database of rental properties and landlords, and conducting inspections to ensure rental units meet basic health and safety standards.		Economic Prosperity and Housing	
5.2.2	Maintain affordability of Manufactured Home Parks (MHPs). This can include zoning to protect existing mobile home parks that provide naturally affordable housing units, supporting nonprofit organizations who work with residents to help them purchase manufactured dwelling parks under a cooperative model, and supporting residents with low-income to maintain properties in manufactured dwelling parks.		Community Development; Economic Prosperity and Housing	
5.2.3	Explore opportunities to preserve single-family homes for long-term affordability. This could include voluntary Right of First Refusal programs, engaging Community Land Trusts, and gathering input from homeowners, tenants, and nonprofit partners to understand interest, feasibility, and potential incentives for participation.		Economic Prosperity and Housing	
5.2.4	Support transitional housing for people experiencing homelessness.		Economic Prosperity and Housing	
5.2.5	Support Community Land Trusts. The City should work to help local CLTs build capacity to increase the number of CLT units in Vancouver, particularly neighborhood-specific CLTs.		Economic Prosperity and Housing	
5.2.6	Enhance programs to provide home repair loans and grants to stabilize and assist homeowners with low to moderate income by making improvements to their homes.		Economic Prosperity and Housing	
5.2.7	Preserve multi-family housing. Fund critical repairs or rehabilitation through grants or low-interest loans, support acquisition by mission-driven developers or nonprofits, monitor expiring affordability covenants, and intervene early. Identify and prioritize at-risk properties for preservation.		Economic Prosperity and Housing	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

26. Housing Solutions Lab. "Rental Registries." Housing Policy Library. https://www.localhousingsolutions.org/housing-policy-library/rental-registries/.
27. Municipal Research and Services Center. "Manufactured Housing Regulation and Preservation." Housing and Homelessness. https://mrsc.org/explore-topics/housing-homelessness/housing/manufactured-housing.
28. Housing Alliance of Pennsylvania. "Affordable Housing Preservation: Right of First Refusal or Opportunity to Purchase." https://housingalliancepa.org/wp-content/uploads/OppToPurchaseFactSheet.pdf.
29. HUD Exchange. "What is Transitional Housing?." Transitional Housing. https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/transitional-housing/.





Case Study:

Community Land Trusts (CLTs)

A Community Land Trust is a shared equity model that helps ensure long-term affordability through deed restrictions that require a portion of equity to be reinvested as a subsidy to reduce the sale price for future buyers.

Example CLT: Proud Ground

- Proud Ground's mission directly addresses housing equity by utilizing the CLT model to achieve two goals for households with low- and moderate-income:
  - **Permanent affordability:** By retaining ownership of the land and selling only the home structure to the buyer, Proud Ground drastically reduces the initial purchase price.
  - **Wealth Building:** Unlike rental assistance, the CLT model allows homeowners to build equity. The standard Proud Ground resale formula ensures the homeowner earns back their principal plus a set percentage of the appreciation in the home's value when they sell.[30]
- Proud Ground project example: Proud Ground partnered with the Portland Clean Energy Community Benefits Fund (PCEF) on projects to create climate-resilient, affordable homes:
  - **Design:** Development of net-zero energy townhomes that feature solar panels, high-performance windows, and advanced insulation.
  - **Financial Impact:** Due to the CLT model and PCEF funding, homes that would typically sell for over $400,000 were offered to income-qualified buyers for less than $300,000.
  - **Long-Term Benefit:** Homeowners benefit from a permanently reduced purchase price and super low utility bills (or even no bills) due to the net-zero design, further increasing their long-term financial stability and equity.[31]



Case Study:

Affordable Housing Fund (AHF)

The City of Vancouver has an AHF that is funded through a local property tax levy. First approved in 2016, it was renewed for an additional $100 million for 2024–2033. The AHF supports people experiencing very low-income in Vancouver through affordable housing development, rental assistance, and homelessness services. [32]

- The City has funding available to community partners for projects and programs that:
  - Build and preserve long-term affordable housing in Vancouver;
  - Provide temporary shelter to people experiencing homelessness; or
  - Provide rental assistance and services to help households avoid an eviction or access a rental unit.
- The funding aims to increase affordable housing for individuals and families experiencing low incomes within the City of Vancouver, with a focus on:
  - Households earning below 50% of the Area Median Income (AMI) for rental units.
  - Households earning below 80% of the AMI for homeownership opportunities.
  - AMI is the midpoint of a region's household incomes and is used to determine what counts as affordable housing for different income levels.

30. Proud Ground. "Our Organization." About Us. https://www.proudground.org/our-organization
31. City of Portland. "Proud Ground and PCEF collaborate on building efficient, climate-resilient and affordable housing." Planning and Sustainability. https://www.portland.gov/bps/cleanenergy/news/2025/2/6/proud-ground-and-pcef-collaborate-building-efficient-climate.
32. City of Vancouver. "Affordable Housing Fund." Economic Prosperity and Housing. https://www.cityofvancouver.us/economic-prosperity-and-housing/affordable-housing-fund/.

Strategy 3

Support production of affordable housing.



Transit-Oriented Development (TOD)

Development that concentrates housing, jobs, and amenities within a walkable area around transit services. It aims to create compact, walkable, mixed-use neighborhoods that reduce car dependence and support vibrant, sustainable communities.[33]

Community Housing Development Organization (CHDO)

A private, non-profit community based organization that has staff with the capacity to develop affordable housing for the community.[34]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

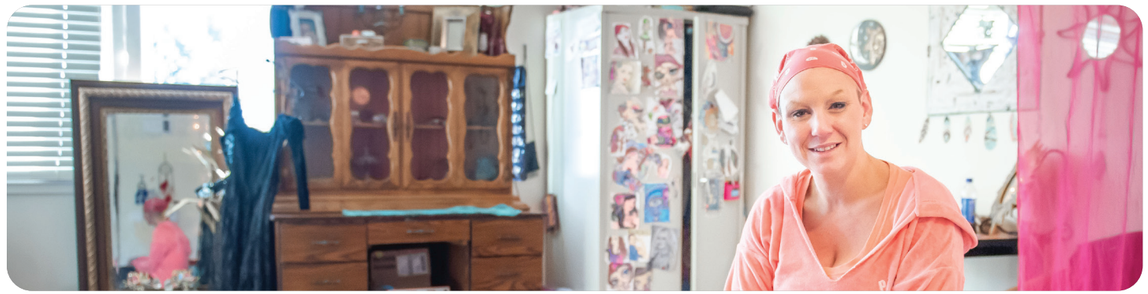
Community Identified | High Priority if Indicated

	Actions	Goals	Lead Department	Priority
5.3.1	Support production of affordable housing by implementing the City's Housing Action Plan, which outlines specific actions to promote affordable and market-rate development.		Economic Prosperity and Housing	
5.3.2	Create a Land Acquisition and Management Strategy to acquire land for the development and preservation of affordable housing.		Economic Prosperity and Housing	
5.3.3	Advocate to increase funding to support affordable housing development at the state and federal levels.		City Manager's Office	
5.3.4	Incentivize inclusive transit-oriented developments (TODs). Incentives can include targeting the MFTE program to add transit-supportive requirements, providing the option of Type 1 development review to expedite the application process, and facilitating low-interest financing for projects with significant community benefit.		Economic Prosperity and Housing; Community Development	
5.3.5	Support public partnerships (private, nonprofit, or VHA) that further equity and housing goals. • Support and partner with mission-aligned organizations, including CHDOs, to build local capacity for equitable and affordable housing development. • Identify strategies to financially support public partnerships using non-traditional financing tools (i.e. revolving loan fund or philanthropic investment fund).		Economic Prosperity and Housing	
5.3.6	Provide guidance and resources to support equitable community engagement in affordable housing projects. Offer tools such as equity-based planning, community benefit frameworks, advanced engagement feedback, and clear suggestions for how input can be incorporated, so developers can incorporate inclusive practices without needing to do their own engagement or delaying production. Maintain a list of trusted CBOs and tenant groups that developers can contact to host engagement conversations.		Economic Prosperity and Housing	
5.3.7	Support non-traditional housing: Promote and remove regulatory barriers preventing non-conventional methods of constructing housing, such as modular, panelized construction, 3d printing, or other methods that have the potential to reduce construction costs.		Community Development; Economic Prosperity and Housing	

33. Transit-Oriented Development Institute. "TOD." Transit-Oriented Development. http://www.tod.org/.
34. HUD. "Home CHDO." HUD Exchange. https://www.hudexchange.info/programs/home/topics/chdo/#policy-guidance-and-faqs.

Strategy 4

Support programs and projects that help residents with lower-income enter and/or stay in the housing market to begin building generational wealth.



Limited Equity Cooperative (LEC)

A housing model where residents own a share in the building instead of their individual unit, and any profit from selling their share is capped to keep the home affordable for future residents. It's collectively owned and democratically run by the members.[35]

Individual Development Account (IDA)

A matched savings account designed to help individuals with low-income build assets for specific goals such as homeownership. Funds are matched by government agencies or non-profits.[36]

Goals Key:

- Equitable Community
- Universal Design & Access
- Focus on Youth & Aging Population
- Transparent and Inclusive Governance

Community & Priority Key:

- Community Identified
- High Priority if Indicated

	Actions	Goals	Lead Department	Priority
5.4.1	Fund programs that help homeowners with low income maintain and remain in their homes. This may include energy conservation, utilities assistance and home repair programs. Help residents reduce energy consumption to lower utility costs by creating pathways to weatherize their homes and learn sustainable energy use techniques.		Economic Prosperity and Housing	
5.4.2	Develop limited equity housing models with lower financial risk to support ownership opportunities for households with low income.		Economic Prosperity and Housing	
5.4.3	Create and/or fund programs that help households with low to moderate income enter the housing market affordably. Fund down payment assistance and financial literacy programs to help residents with moderate-income achieve homeownership.		Economic Prosperity and Housing	
5.4.4	Encourage and support models of homeownership to maintain long-term affordability. This includes supporting organizations using Community Land Trust (CLT) and Limited Equity Cooperative (LEC) shared equity models and deed-restricted homeownership to ensure long-term affordability for homebuyers with low to moderate income.		Economic Prosperity and Housing	
5.4.5	Support programs that increase household financial stability to increase housing security. See Economic Development and Workforce Empowerment (Chapter 4) for action items.		Economic Prosperity and Housing	
5.4.6	Create and fund a new Individual Development Account (IDA) program to help more people enter into the housing market to begin building generational wealth. Advocate for greater state funding to support IDAs.		Economic Prosperity and Housing	
5.4.7	Support cooperative housing where members pool resources to build or buy property together.		Economic Prosperity and Housing	

35. Housing Solutions Lab. "Limited Equity Cooperatives." Housing Policy Library. https://www.localhousingsolutions.org/housing-policy-library/limited-equity-cooperatives/.
36. Oregon IDA Initiative. "About the Oregon IDA Initiative." Overview. https://oregonidainitiative.org/overview/.

Strategy 5

Support the use of universal design principles to enhance accessibility for people of all ages and abilities.

	Actions	Goals	Lead Department	Priority
5.5.1	Require universal design principles in new housing, commercial development, and public spaces.		Community Development	
5.5.2	Encourage affordable housing options tailored to multigenerational living, aging in place, and a wide range of abilities.		Economic Prosperity and Housing	
5.5.3	Provide financial assistance (grants or low interest loans) to home owners with low income to retrofit existing homes with accessibility features.		Economic Prosperity and Housing	
5.5.4	Support the retrofitting of existing public spaces and commercial developments to enhance accessibility.		Economic Prosperity and Housing	

Retrofit

A modification or upgrade performed after the building has been completed and occupied. Retrofitting existing homes to make them more accessible could include installing wheelchair ramps, widening doors and hallways to accommodate wheelchairs, lowering kitchen appliances to make them reachable from a seated position, or installing smart technology to assist with lights or doors.[37]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated



Strategy 6

Ensure that residents have access to services that support multigenerational living and aging in place.

	Actions	Goals	Lead Department	Priority
5.6.1	Support programs that connect older adults with caregivers, including family caregivers and professional services.		Economic Prosperity and Housing	
5.6.2	Create intergenerational community spaces and programming that encourage interactions between seniors, children, and working-age adults.		Economic Prosperity and Housing; Parks, Recreation and Cultural Services	
5.6.3	Work with partners to develop resources and trainings for family members caring for aging relatives.		Economic Prosperity and Housing	
5.6.4	Explore options to expand property tax relief programs for senior homeowners and multigenerational households with low-income.		Economic Prosperity and Housing	

Universal Design

The design of products or environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design regardless of age, ability, or physical condition.[38]

37. Cinnamon Janzer. "The Unaffordability of Accessibility: The Challenge of Retrofitting American Homes." Shelter Force. https://shelterforce.org/2023/06/22/the-unaffordability-of-accessibility-the-challenge-of-retrofitting-american-homes/.
38. National Association of Home Builders. "What is Universal Design?." Consumer Resources. https://www.nahb.org/other/consumer-resources/what-is-universal-design.

Strategy 7

Support identity-based and culturally-specific housing needs.

Culturally-Specific Housing Needs

Refers to the design, location, and management of housing that reflects and supports the unique social, religious, lifestyle, and general practices of a specific cultural, ethnic, or demographic group. Culturally-specific housing needs ensure housing validates and sustains the residents' way of life rather than forcing them to adapt their culture to a standard housing model.[39]

Identity-Based Housing Needs

Identity-based housing needs refer to the distinct housing challenges, barriers, and preferences experienced by individuals based on aspects of their social identity — including race, ethnicity, gender identity, sexual orientation, disability, age, religion, national origin, and familial status.

Permanent Supportive Housing (PSH)

Combines affordable housing with supportive services to help people achieve long-term housing stability. PSH is a Housing First principle and is designed to build independent living skills as a solution to homelessness. Housing First is an approach to ending homelessness that focuses on providing permanent and unconditional access to housing before other supportive services. Supportive services can include health care, mental health counseling, job training and employment support.[40]

	Actions	Goals	Lead Department	Priority
5.7.1	Work with partners to facilitate and fund housing that meets the needs of different households based on age, sex, gender identity, culture, disability, and other factors.		Economic Prosperity and Housing	
5.7.2	Facilitate collaboration and partnerships between community-based organizations and affordable housing providers. This will help affordable housing units to be reflective of community needs when disaggregated by race, disability, sex, gender identity, and other factors.		Community Development; Economic Prosperity and Housing	
5.7.3	Accommodate identity-based needs in Permanent Supportive Housing (PSH), Temporary Housing, and Shelter Space.		Economic Prosperity and Housing; City Manager's Office	
5.7.4	Do not require citizenship status or government-issued IDs for shelter access at City-funded facilities. An exception can be made only where alternative funding source requirements expressly prohibit this standard.		City Manager's Office	
5.7.5	Support housing models that reflect cultural traditions, such as multi-generational living spaces, communal kitchens, shared common spaces, or extended family accommodations.		Community Development; Economic Prosperity and Housing	
5.7.6	Support mixed-income housing developments.		Community Development; Economic Prosperity and Housing	
5.7.7	Support culturally responsive property management and tenant support services, including providing information in different languages.		Community Development; Economic Prosperity and Housing	
5.7.8	Develop shelters that offer adequate services to address barriers and help residents transition into permanent housing. Ensure funding is adequate to provide needed programming or support services.		City Manager's Office	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

39. Minnesota Housing Partnership. "Towards Culturally Sensitive Housing." https://mhponline.org/toward-culturally-sensitive-housing/.
40. National League of Cities. "What is Permanent Supportive Housing?." https://www.nlc.org/article/2024/01/31/what-is-permanent-supportive-housing/.



CHAPTER 6

TRANSPORTATION JUSTICE

VISION

The City's transportation system is equitable, sustainable, accessible and affordable, and barriers to mobility are eliminated for all residents.

Strategy 1

Make walking and rolling, small mobility, and transit options convenient for neighborhood travel.

	Actions	Goals	Lead Department	Priority
6.1.1	Develop and implement a Vancouver Safe Routes to School (SRTS) program. The City will work with schools to understand student travel patterns, identify barriers to safe walking, rolling, and biking, and take action to address those challenges.		Community Development	
6.1.2	Prioritize areas for improvement using the Equity Atlas to make walking and rolling, small mobility, and transit options safe and accessible for neighborhood travel.		Community Development; Public Works	
6.1.3	Increase street tree canopy in partnership with Urban Forestry and Parks, focusing on equity priority areas first. This can serve as a form of traffic calming, provide more enjoyable and comfortable routes, and provide needed cooling during extreme heat events.		Community Development; Parks, Recreation and Cultural Services; Public Works	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated





Case Study:

Safe Routes to School

- Safe Routes to School is a movement to create safe, convenient, and fun opportunities for children to walk and bike to and from school. The concept is to address the decline in children walking or biking to school by improving safety and reducing traffic around schools.[41]
- Portland's SRTS program features:
  - Dedicated funding specifically to SRTS.
  - Infrastructure focused changes such as high-visibility crosswalks, building new sidewalks and filling sidewalk gaps, and implementing traffic calming measures like speed bumps, raised crosswalks, and refuge islands near schools.
  - Equity-focused approach prioritizes schools located in areas with high poverty rates and where there is a disproportionate number of traffic crashes involving pedestrians and cyclists.
  - Encouragement and education programs that work with neighborhood associations and schools to host events, provide free bicycle education, and distribute helmets and bike equipment to students.[42]
- Portland's SRTS initiatives have increased the number of children walking and biking to school and reduced speed and traffic volume on critical school routes.[43]

41. Safe Routes Partnership. "Impact of Safe Routes to School Program on Walking and Bicycling." Resource. https://saferoutespartnership.org/resource/impact-srts-walking-biking/.
42. City of Portland. "Fixing Our Streets and Safe Routes to School." Transportation. https://www.portland.gov/transportation/walking-biking-transit-safety/safe-routes/fixing-our-streets-and-safe-routes-school.
43. City of Portland. "Safe Routes to School Program Summary 2023-24." Transportation. https://www.portland.gov/transportation/walking-biking-transit-safety/safe-routes/safe-routes-school-program-summary-2023-24.

Strategy 2

Create transportation corridors that connect growth areas, support business, serve transit, and maximize safety and accessibility.



Transportation Improvement Program (TIP)

Every year, the City of Vancouver prepares a Six-Year Transportation Improvement Program (TIP). The TIP lists all future projects with detailed project information and funding status. Projects in the TIP include studies, plans, and major street, bicycle, pedestrian, and traffic signal improvements. Each annual update to the TIP includes a public outreach process and requires City Council approval.[44]

Vision Zero

A strategy to eliminate all traffic fatalities and severe injuries, while increasing safe, healthy, and equitable mobility for all.[45]

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

	Actions	Goals	Lead Department	Priority
6.2.1	Program projects into the TIP with a set of criteria based on equity, safety, climate, and transportation choice. Elevate projects that are in equity priority areas, serve transit stops, are near a school, are in an identified critical walking and rolling or bicycling gap, or are along a high-crash corridor.		Community Development; Public Works	**High**
6.2.2	Prioritize corridors for repaving based on equity, transit use, and pavement condition.		Public Works	
6.2.3	Adopt a Vision Zero policy committing to end traffic fatalities and serious injuries on Vancouver streets by 2040.		Community Development	
6.2.4	Create a process for regular updates to the Local Roads Safety Plan by analyzing existing collision data to identify the city's "high-crash corridors." Regularly update the online dashboard of the high-crash roads and apply the City's equity index to determine where historically underserved communities are at greater risk of death and injury while traveling in their neighborhood. Use this information to prioritize investments, outreach and education to improve safety and reach our Vision Zero goals.		Community Development; Public Works	**High**
6.2.5	Make parking and other signage highly legible and easy to understand from the user perspective, particularly for non-native English speakers and people with disabilities. Use technology, information, wayfinding, or other strategies so people can easily find their destination.		Community Development; Public Works	
6.2.6	Improve public education and outreach around how to use public transportation, including campaigns that empower both youth and parents to take the bus, to debunk negative perceptions of public transit, and increasing bus stop coverage and amenities across neighborhoods citywide.		Community Development	

44. City of Vancouver. "Transportation Improvement Program." Public Works. https://www.cityofvancouver.us/government/department/public-works/transportation-improvement-program/
45. Vision Zero Network. "What is Vision Zero?." About. https://visionzeronetwork.org/about/what-is-vision-zero/.

Strategy 3

Fill sidewalk gaps, add safe crossings, and support speed and reliability projects that keep transit moving efficiently.

	Actions	Goals	Lead Department	Priority
6.3.1	Prioritize sidewalk and crosswalk gaps adjacent to transit stops, schools, parks, and other City facilities, particularly along transit equity corridors. Identify first/last mile barriers to major transit stops and address on a rolling basis.		Community Development	
6.3.2	In coordination with C-TRAN, build a network of Enhanced Transit Corridors where higher levels of transit service (frequency, hours of operation, stop amenities) are desired based on existing and future density and equity needs.		Community Development	**High**
6.3.3	Ensure that roadway configurations and design support transit travel time and reliability on enhanced transit corridors.		Public Works	
6.3.4	Designate transit equity corridors based on equity priority areas and residential areas with high reliance on transit. Use as a criterion in project prioritization.		Community Development	
6.3.5	Integrate shared and emerging mobility technology and tools with C-TRAN microtransit zones to provide a suite of mobility options, especially in lower-density areas without high-frequency transit.		Community Development	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated



Transit Equity Corridors

Public transportation routes or areas designed to ensure all communities, especially underserved or low-income communities, have fair and just access to reliable, affordable, and efficient public transportation.[46]

Microtransit

Microtransit is a flexible, on-demand public transportation service that uses smaller vehicles to connect passengers to destinations within a defined service area. C-TRAN launched The Current that provides door-to-door service that can be scheduled through a mobile app or over the phone. [47]

46. City of Vancouver. "Equitable Transportation Investment Strategy." https://www.cityofvancouver.us/wp-content/uploads/2023/07/cov_equitable_transportation_investment_strategy_22_05_26.pdf.
47. C-TRAN. "Introducing The Current: C-TRAN's New On-Demand Service." https://mail.c-tran.com/about-c-tran/news/news-releases/876-introducing-the-current-c-tran-s-new-on-demand-service.

Strategy 4

Make the walking, rolling, bicycling, and small mobility networks inviting for all ages and abilities.

	Actions	Goals	Lead Department	Priority
6.4.1	Build a citywide low-stress Bike and Small Mobility (BSM) network that prioritizes safety and comfort for people of all ages and abilities. Target a density of low-stress facilities every half-mile.		Community Development; Public Works	
6.4.2	Create safe routes to community destinations such as parks and schools. Identify the specific needs of seniors and develop safe routes for these users.		Community Development	
6.4.3	Explore the creation of an E-bike rebate program focused on increasing access to E-bikes for individuals in households with low- and moderate-income.		Community Development	

Bicycle and Small Mobility (BSM) Network

A connected system of bike lanes, paths, and routes for small, non-motorized or low-speed mobility devices like e-scooters and e-bikes to provide safe, accessible, and convenient travel options.[48]

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated



Case Study:

E-bike rebate program

- An e-bike rebate program is a financial incentive offered by a government entity to encourage residents to purchase an electric bicycle. The goal of these programs is to encourage residents to switch from car trips to e-bike use.
- The City of Tacoma's E-Bike Rebate Pilot Program is focused on communities impacted by pollution.
  - Tacoma's program was funded from the Department of Ecology with funding from Washington's Climate Commitment Act.
  - Because it focused on air quality, the e-bike rebates were available specifically in neighborhoods highly impacted by air pollution.
- The e-bike rebates were tiered based on household income ranging from $300 to $1,200.
  - 95% of Tacoma's e-bike rebates went to lower-income residents and were for the full $1,200.
- Community Outreach
  - The City partnered with Community Ambassadors (local leaders that were compensated) to deliver culturally relevant outreach in their communities and were fluent in Spanish, Cambodian, and Vietnamese.
  - The City also hosted E-Bike Community Parties at neighborhood parks to answer questions about e-bikes and encourage residents to apply.
  - The City partnered with a local cycling group to offer free Adult Learn To Ride classes to participants.[49]

48. City of Vancouver. "Transportation System Plan 2024-2044." https://www.cityofvancouver.us/wp-content/uploads/2024/01/Van-TSP-Book-202402-Reduced.pdf.
49. City of Tacoma. "E-Bike Programs." Public Works. https://tacoma.gov/government/departments/public-works/mobility-options/bicycling/e-bike-programs/.

Strategy 5

Embed equity at all levels when developing policies and programs relating to new transportation technologies.

	Actions	Goals	Lead Department	Priority
6.5.1	Create City policies for how shared mobility and emerging mobility vendors can operate in Vancouver. Integrate equity through reduced costs for people with low incomes.		Community Development	
6.5.2	Pilot a small mobility and scooter share program. Focus station placement in equity priority areas and subsidize membership for people with low incomes.		Community Development	

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated





CHAPTER 7

SUSTAINABILITY & CLIMATE JUSTICE

VISION

All residents live in environments free from pollution and have access to resources during extreme climate events.

Strategy 1

Address health exposure and climate vulnerability.

	Actions	Goals	Lead Department	Priority
7.1.1	Identify areas where health exposure and climate vulnerability are high. Utilize the state's environmental justice analysis, Comprehensive Plan data, Clark County Heat Watch 2024 Report, and other related data.		City Manager's Office; Community Development	**High**
7.1.2	Review Climate Adaptation Strategy with an equity lens and create equity-based action items to be implemented.		City Manager's Office; Community Development	**High**
7.1.3	Reduce and remediate soils contaminated from industrial and building processes.		Economic Prosperity and Housing	

Climate Vulnerability

The degree to which a community is susceptible to harm and able to prepare, endure, and recover from the impacts of climate change, including extreme weather events, sea-level rise, or temperature changes.[50]

Health Exposure

Health exposure is the degree to which people are subjected to environmental conditions that negatively impact wellbeing, such as air pollution, extreme heat, noise, or toxic substances.

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | **High** High Priority if Indicated



50. Climate Vulnerability Index. "About." The U.S. Climate Vulnerability Index. https://climatevulnerabilityindex.org/about/.

Strategy 2

Prioritize green infrastructure investments in equity priority areas.

Green Infrastructure

Green infrastructure uses plants, soils, and other media to capture and treat stormwater at its source. It manages stormwater by letting it soak into the ground, be absorbed by plants, or evaporate naturally. Examples include rain gardens, bioswales, and green roofs.[51]

Heat Island Effect

Heat islands occur when a developed area experiences higher temperatures than nearby rural areas, or when areas experience hotter temperatures within a city due to human activities, dense buildings, lack of trees and green spaces, and paved surfaces that absorb and retain heat.[52]

Ecosystem Benefits

Ecosystem benefits are the positive contributions that natural systems provide to people, plants, and animals, such as clean air and water, climate regulation, flood protection, wildlife habitat, food production, and mental well-being.[53]

Bioswales

Bioswales are vegetated, landscape channels that capture, treat, and filter stormwater runoff.[54]

	Actions	Goals	Lead Department	Priority
7.2.1	Invest in green infrastructure, including parks, urban forests, and stormwater management systems to improve environmental quality and resilience in equity priority areas. Include green infrastructure elements in all capital investments where feasible.		Parks, Recreation and Cultural Services; Urban Forestry; Public Works	
7.2.2	Combat the impacts of the heat island effect by increasing biodiversity and offering quick access to nature, prioritizing equity priority areas. Incentivize long-lived, large form, drought-tolerant, and/or climate-resilient native plantings and retention in existing and new developments. Reach 28% tree canopy citywide by focusing on areas with the largest disparities in tree cover.		Parks, Recreation and Cultural Services; Urban Forestry	
7.2.3	Keep natural lands intact to ensure that vegetation continues to capture carbon from the atmosphere and provide ecosystem benefits and access to nature.		Parks, Recreation and Cultural Services; Community Development	
7.2.4	Widen planting strips to accommodate medium to large street trees, prioritizing areas most affected by extreme heat and air pollution, in order to maximize shade and reduce both air pollution and the heat island effect.		Community Development; Public Works	
7.2.5	Screen highways with vegetation that provides high levels of carbon capture to reduce air pollution and provide a visual buffer.		Community Development, Public Works	
7.2.6	Support green activation of rooftops and vertical walls to help reduce the urban heat island effect, prioritizing equity priority areas and areas with the greatest disparities of green infrastructure. Utilize rooftops for edible rooftop gardens with small trees and vegetated walls and spaces to reduce urban heat islands.		Community Development; Economic Prosperity and Housing	
7.2.7	Implement green infrastructure solutions in areas prone to localized flooding, including storage basins, ponds, bioswales, rain gardens, and stormwater trees, to reduce stormwater impacts.		Community Development; Public Works	

Goals Key:

Equitable Community | Universal Design & Access | Focus on Youth & Aging Population | Transparent and Inclusive Governance

Community & Priority Key:

Community Identified | High Priority if Indicated

51. EPA. "About Green Infrastructure." Green Infrastructre. https://www.epa.gov/green-infrastructure/about-green-infrastructure.
52. EPA. "Heat Island Effect." Heat Islands. https://www.epa.gov/heatislands.
53. USDA. "Ecosystem Services." Climate Hubs. https://www.climatehubs.usda.gov/ecosystem-services.
54. NACTO. "Bioswales." Urban Street Design Guide. https://nacto.org/publication/urban-street-design-guide/street-design-elements/stormwater-management/bioswales/.

Strategy 3

Expand access to education, resources and natural areas, particularly in equity priority areas.

	Actions	Goals	Lead Department	Priority
7.3.1	Ensure all neighborhoods have access to healthy food options, prioritizing equity priority areas. Incentivize community gardens.		Economic Prosperity and Housing; Community Development; Parks, Recreation and Cultural Services	
7.3.2	Create walkable (15 minute) opportunities for all people to access fresh food and support food sovereignty, reducing emissions and reliance on a personal vehicle.		Community Development	
7.3.3	Create programs for both children and adults to learn about nature-based solutions throughout the community.		Parks, Recreation and Cultural Services	
7.3.4	Ensure all neighborhoods have access to open space by providing accessible, walkable trail connections within a half mile to the nearest open space, prioritizing equity priority areas.		Community Development; Parks, Recreation and Cultural Services; Public Works	

Goals Key:

Equitable Community

Universal Design & Access

Focus on Youth & Aging Population

Transparent and Inclusive Governance

Community & Priority Key:

Community Identified

High

High Priority if Indicated





Americans with Disabilities Act (ADA) Transition Plan

April 27, 2026

CITY OF Vancouver WASHINGTON



Vancouver Waterfront

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Esther Short Park

Commitment

Vancouver, Washington, located along the Columbia River, is a growing and diverse community. The City is home to the Washington State School for the Blind and the Washington School for the Deaf, as well as more than 20,000 residents with disabilities. These residents represent a broad demographic spectrum of race, ethnicity, gender, age, income level, and background.

For generations, local disability leaders — including veterans, youth, elders, caregivers, advocates, and community organizers — have worked to make Vancouver more accessible, inclusive, and responsive to the lived experiences of people experiencing disabilities.

The City recognizes this history of leadership and its ongoing responsibility to build a more accessible community. We are committed to creating opportunities for people of every ability to belong and thrive. This work aligns with the City's broader vision of a Vancouver for All.

Purpose

Equal access to information, facilities, programs, and civic processes is essential to meaningful participation in community life. Yet barriers remain. Some residents encounter obstacles when seeking information, accessing physical spaces, participating in programs, or engaging in decisions that affect them.

The City's 2023–2029 Strategic Plan and Engagement and Access vision affirm our responsibility to remove these barriers and strengthen trust with the community. For the disability community, this includes:

- Improving the accessibility of existing facilities and services
- Incorporating accessibility into budget planning
- Embedding best practices for inclusion into new projects and programs
- Ensuring meaningful opportunities for community input



The City of Vancouver Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan (the "ADA Transition Plan," the "Transition Plan," or the "Plan") formalizes this work. It serves as the City's roadmap for evaluating City facilities to identify physical obstacles that limit accessibility of programs or activities for individuals with disabilities, including curb ramps for pedestrian access to streets, roads, and walkways; outlines a methodology for implementing improvements; specifies a schedule for progress monitoring and Plan management; indicates the City's designated official responsible for Plan implementation; and provides for public notice and participation. Members and representatives of the disability community were engaged at key stages of this Plan update process to inform current findings and recommendations.

This Plan will guide accessibility improvements, support long-term compliance planning, and strengthen the City's ability to provide equitable access to all public programs, services, and activities. It has been updated and developed in accordance with Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.



Part I: Self-Evaluation Process

The Transition Plan is a public, living document informed by the City's ADA Self-Evaluation that outlines how the City will address accessibilities barriers identified in City policies, programs, services, and facilities over time. The Plan serves as both a compliance tool and a long-term roadmap for accessibility improvements necessary to remedy non-compliance

The Transition Plan includes:

- A summary of accessibility barriers identified through the Self-Evaluation
- A prioritization of structural and programmatic barriers using established criteria
- An implementation methodology and schedule for barrier removal, remediation, or alternative methods of access
- Estimated timeframes and cost projections, when available

Consistent with Title II, the Transition Plan addresses accessibility when City services, programs, and activities are viewed in their entirety. The Plan will continually evolve and will be periodically updated to reflect changes in facilities, availability of funding, input from the community input, or identification of additional barriers.

Self-Evaluation

The ADA Self-Evaluation is the City's internal review of how accessible its services, programs, activities, and facilities are. It includes:

- Physical accessibility assessments of City-owned facilities, including buildings, parks, parking lots, and recreation areas;
- Public rights-of-way review to evaluate pedestrian accessibility, including sidewalks, curb ramps, and intersections
- Review of City policies, procedures, and practices to ensure individuals with disabilities have access to programs and services
- Surveys and assessments of City programs and services

The City has updated the Self-Evaluation in accordance Title II of the Americans with Disabilities Act (ADA) (28 C.F.R. Part 35) with appropriate focus on program access and nondiscrimination in public services and facilities. This Plan does not include an evaluation of employment practices under Title I. The purpose of the Self-Evaluation is to enable the City to identify the public facilities, programs and services that must be modified or remediated to ensure that Vancouver ADA compliance.

The Plan ensures this by:

- Making the City's Transition Plan publicly available;
- Publicizing the City's established ADA grievance procedure;
- Identifying the designated City employee responsible for overseeing ADA compliance;
- Updating the ADA Self-Evaluation of City facilities, programs, policies, and practices to determine any changes necessary to meet the ADA requirements;
- Updating the City's ADA Transition Plan to identify how and when these changes will be implemented; and
- Ensuring public participation by Including people with disabilities in the Self-Evaluation and Transition Plan update process by establishing an ADA stakeholder advisory group

Program & Policy Review

To evaluate the accessibility of City programs, services, and activities, the City is conducting an administrative review to assess compliance with Title II requirements. This includes:

- An external assessment of the City's website and digital presence from a public user perspective
- An internal departmental questionnaire to collect baseline information about program operations, policies, procedures, and accessibility practices

ADA POLICY AND PROGRAM EVALUATION

The City is updating its policy and program evaluation to ensure that City policies, services, and practices are nondiscriminatory to people with disabilities. This evaluation used the New England ADA Center's ADA Title II Action Guide for State and Local Governments as a framework. The City's Engagement and Access Department is deploying a survey based on this guidance for the purpose of gaining a better understanding of the level of awareness, compliance, and preparedness across departments with respect to accessibility and inclusion for those with disabilities. The information being gathered describes:

- Programs and services offered
- How departments provide reasonable modifications and auxiliary aids/services
- Accessibility-related policies and grievance procedures

- Department practices that support effective communication and program access

The departmental program assessment includes a total of 58 questions with responses to be collected and catalogued in 2026.

DIGITAL ACCESSIBILITY ASSESSMENT

The City provides services, programs, and activities through its websites, social media, and other digital platforms. It uses these tools to serve, inform, and engage residents, businesses, and visitors through the City's digital content.

The City is committed to creating an inclusive online experience and strive to provide digital content that is accessible and complies with the Web Content Accessibility Guidelines as defined by the World Wide Web Consortium (W3C). Accessibility removes barriers, fosters equity, and is part of the City's values. The City is committed to making our services, programs, and activities accessible to everyone.

The Department of Justice (DOJ) recently published a new rule on digital accessibility under Title II of the Americans with Disabilities Act (ADA), effective for the City in April 2027. Title II of the ADA requires state and local governments to provide services, programs, and activities that are accessible to people with disabilities. The new rule specifies how the City must make its digital content accessible to all people.
The City has applied or is in the process of applying the new rule to:

- The City website
- All social media platforms used by the City
- Web apps (including third-party apps used by the City to provide services or information)

As part of this effort, the City is using a digital accessibility assessment based on the Digital Accessibility Maturity Model (DAMM) developed by the Level Access organization dated May 23, 2024. The purpose of the assessment is to assess, benchmark, and improve the City's digital accessibility initiatives. Information gathered describes:

- Organizational goals and values around digital accessibility to information
- Leadership and governance of, and accountability for, digital accessibility
- Capability and knowledge of employees
- Processes for creating, approving, and retaining content
- Procurement and vendor management
- Support and communication available

Physical Accessibility Assessment

In 2025, the ADA Coordinator facilitated physical accessibility assessments of the following public-facing City assets (assessments were limited to areas open to the public; employee-only and restricted areas were not included in this phase):

- 79 developed parks and community gardens
- 28 public access facilities
- 10 public parking lots

Assessments were completed using the Origami software platform. Survey questions were based on the ADA Checklist for Existing Facilities and aligned with the 2010 ADA Standards for Accessible Design.

The survey instrument was developed by the ADA Coordinator, the City Safety Officer, and All Access Solutions, LLC. Data collection was conducted by the ADA Coordinator, All Access Solutions, LLC, and City staff who volunteered to support the assessment process.

The purpose of the physical assessment was to identify potential structural barriers that could affect program access and to provide consistent data to support prioritization under Title II.

For each location, as applicable, the assessment followed the ADA checklist priorities:

- **Priority 1: Accessible approach and entrance**
  - Parking
  - Exterior Accessible Route
  - Curb Ramps
  - Exterior Ramps
  - Entrance
- **Priority 2: Access to goods and services**
  - Interior Accessible Route
  - Interior Ramps
  - Elevators
  - Signs
  - Interior Doors (to conference rooms, etc.)
  - Rooms and Spaces
  - Seating (Assembly Areas, Non-employee work surfaces, General)
  - Sales and Service Counters
- **Priority 3: Access to public toilet rooms**
  - Accessible Route
  - Signs
  - Entrance
  - Inside the toilet room
  - Lavatories (The 2010 Standards refer to sinks in toilet rooms as lavatories.)
  - Soap Dispensers and Hand Dryers
  - Toilet Stalls
- **Priority 4: Access to other items such as water fountains and public telephones**
  - Drinking Fountains
  - Telephones
  - Fire Alarm Systems

Additional questions from recreation-related checklists were used where applicable, including play areas and other specialized facilities (e.g., pools/spas and boating facilities).

Severity Levels & Priority Rankings

The Self-Evaluation identified potential barriers across assessed facilities, parks, and public access areas. Because funding and staffing resources are limited, not all indicated barriers can be addressed at once. To guide sequencing and further evaluation, the City used a prioritization framework that considers:

- **Severity** (technical noncompliance) and
- **Priority** (programmatic, access, operational, and civil rights considerations)

This approach supports transparent, consistent, and defensible decision-making.

Severity Levels

Each barrier received a Severity Rating based on the degree of noncompliance with applicable ADA standards. Severity ratings reflect technical deficiency when evaluated against the 2010 ADA Standards for Accessible Design and are independent of budget or operational considerations.

Barriers were categorized based on how they appeared or presented in the initial assessment according to a five-level scale:

- **Severity Level 1: Compliant or Nearly Compliant**
  - Meets current standards or is very close; changes would improve inclusion (universal design).
  - Slope/cross-slope: 1–9% out of range
- **Severity 2: Minor**
  - Low likelihood of significantly impacting access; often a duplicate element, employee-focused area, or small margin of noncompliance.
  - Slope/cross-slope: 10–20% out of range
- **Severity 3: Serious**
  - A barrier for many people with disabilities; may allow limited participation or require assistance.
  - Slope/cross-slope: 21–50% out of range
- **Severity 4: Critical**
  - Significantly limits the ability to access or benefit from the program/service when viewed in its entirety.
  - Slope/cross-slope: 51–100% out of range
- **Severity 4+: Critical and Urgent**
  - Severity 4 with a safety component, and/or
  - Slope/cross-slope: more than 100% out of range

Severity describes the extent of the potential deficiency. It does not, by itself, determine when corrective action will occur.

Priority Rankings

Severity is one factor in determining urgency. Each barrier was assigned a preliminary Priority Ranking based on apparent operational and access limitations to focus first on barriers with the greatest impact on meaningful access. Priority factors include:

- Program uniqueness
- Critical nature of the service provided
- High volume of use
- Geographic distribution and transportation access
- Documented complaints or community feedback
- City-owned facilities
- Disability community-identified need
- Income level and prior City investment
- Alignment with planned capital improvement projects (CIP)
- Feasibility and constructability

Under Title II of the ADA, structural modifications must be made unless doing so would result in an undue financial and administrative burden. When full remediation is not immediately feasible, the City will consider alternative methods of access.

The City is in the process of reviewing and validating the self-evaluation data collected as well as the severity levels and priority rankings assigned for consistency and alignment with approaches to remediation.

Facilities Condition Assessments

Access, Doorways And Signage –In areas accessed by the public the following data points were collected for elements related to access, doorways and signage:

- Clearances at doorways and passageway,
- Types of door hardware and door push/pull strength
- Changes in flooring elevation/slope
- Wayfinding signage (nonregulatory)

Restrooms – At restrooms accessed by the public the following data points were collected for:

- Availability of a compliant accessible stall
- Mounting heights and reach of restroom accessories, fixtures, countertops
- Clearances at doorways and inside restroom

Water Fountains – At water fountains accessed by the public the following data points were collected for:

- Availability of compliant accessible water fountains
- Clearances at water fountain and adjacent building elements
- Water fountain operability

Sinks and Counters – At sinks and counters accessed by the public, outside of restroom facilities, the following data points were collected for:

- Clearances and heights of sinks and counters
- Sink faucet operability
- Mounting heights and reachability of counter mounted equipment

Parking – At parking lots accessed by the public the following data points were collected for:

- Accessible parking stalls with compliant clearances
- Accessible route to the building/facility
- Signage and parking striping identifying accessible parking stalls

Sidewalks and Pedestrian Routes - if not addressed through parking lot access above:

- Condition
- Width
- Running slope
- Cross-slope
- Obstructions and encroachments

Going forward, the City intends to update this information on a recurring cycle approximately every five to six years as part of public facilities condition assessments, and as set forth in the Implementation Methodology part of the Plan.

Pedestrian Facilities

In 2016–2017, the City collected data on pedestrian facilities in public rights-of-way. City staff surveyed curb ramps and sidewalks and recorded measurements in the City's Geographic Information System (GIS). This data is used to track compliance with ADA standards. The City aims to update this information about every 10 years .

Curb Ramps

The following data was collected to evaluate compliance with the Public Right-of-Way Accessibility Guidelines (PROWAG):

- Ramp width, length, slope, and cross-slope
- Landing width, length, slope, and cross-slope
- Presence of detectable warning surfaces
- Overall condition (e.g., cracks or gaps)
- Missing ramps

Sidewalks

The following data was collected to evaluate compliance with PROWAG:

- Condition
- Width
- Running slope
- Cross-slope
- Obstructions or encroachments

Driveway Crossings (Pedestrian Access Routes)

Where sidewalks cross driveways, slopes often change to allow vehicle access. The following data was collected to evaluate compliance:

- Sidewalk width, slope, and cross-slope
- Ramp width, length, slope, and cross-slope
- Overall condition

Traffic Signals and Pedestrian Crossings

Pedestrian crossings at signalized intersections and enhanced crossings, such as rectangular rapid flashing beacons (RRFBs) and high-intensity activated crosswalks (HAWKs), are evaluated using the following indicators:

- Pedestrian pushbutton location, orientation, and function
- Crossing and clearance times
- Pedestrian signal heads (for signalized and HAWK crossings)

For a pushbutton to be ADA compliant, it must include a tactile arrow, braille, audible signals, and vibration. The City has not yet completed a full inventory of these crossings but has upgraded many pushbuttons during other improvements (such as curb ramp upgrades or signal timing changes like Leading Pedestrian Intervals). The City is currently completing a full inventory and will add this information to GIS.

Public Engagement

Title II of the ADA requires public entities to:

1. Inform the public about ADA protections
2. Make Transition Plan information available to the public
3. Provide opportunities for people with disabilities and disability organizations to participate through comments and recommendations

The City's ADA Transition Plan has presented in many different iterations, with the most recent and significant public assessment review and published Plan updates initiated in 2012, 2017, and 2024.

As part of this 2026 updated edition, the City has conducted multiple engagement efforts throughout development of this Plan, including:

- **March 2025:** A community survey gathered information about residents' experiences with accessibility and helped inform priority-setting.
- **April 2025:** A kickoff meeting introduced the project scope, methodology, and planned data collection.
- **July 2026:** The City will review progress, summarize findings, and gather feedback on proposed priority ratings and implementation strategies.

Project updates, meeting information, and opportunities for public input are posted on the project webpage: https://www.cityofvancouver.us/accessibility/ada-self-evaluation-and-transition-plan-project.

The City remains committed to ongoing engagement with the disability community throughout implementation and future revisions of this Plan.



Part II: Improvement Methodology

This Transition Plan represents the state of City programs and facilities as of the version date. Because of the City's continual efforts to make ADA improvements, some corrective actions listed are anticipated to be in progress or to be completed prior to or shortly after implementation of the Transition Plan beginning in January 2027.

Implementation Methodology

The City will utilize four primary methods for upgrading public facilities and rights-of-ways to remediate accessibility barriers in accordance with current ADA standards:

1. **Incorporate remediation of accessibility barriers in public improvement work scheduled through the Capital Facilities Improvement Plan and Transportation Improvement Plan.** Projects schedule for improvements will incorporate compliance with ADA accessibility standards.
2. **Stand-alone ADA accessibility improvement projects.** These projects may span various departments or may be more costly and require more planning, consultation, and time to complete so they will be facilitated centrally.
3. **Work order submissions.** Individual departments will submit requests to remove minor maintenance barriers through the Public Works Work Order portal.
4. **Policy and procedure updates**. Departments will remove barriers by changing internal processes to ensure program accessibility.

Ultimately, if there is an accessibility barrier that cannot be remediated or will take years to remediate, it is recommended that City departments modify or relocate the programs to ensure that no public programs, services, or activities take place in any inaccessible areas.

For public facilities, the typical remediation methods provide for corrections to non-accessible infrastructure to be made in several ways, depending on the scope of non-compliance, existing conditions and other parameters identified in the Self Evaluation. The methods the City uses include:

1. **Remove & Replace**: Existing non-compliant situations which involve item or equipment placement or other operational functions are remediated with removal, relocation or new operational procedures which comply with current ADA design standards. This is most typical with furniture or equipment placement and some signage removal or replacement.
2. **Small Capital Improvements**: This work is at a scale that can be completed through facilities maintenance and citywide programmatic efforts. Work typically is conducted without disruption to the existing facility or services. This approach includes a more robust updating signage program, adjustments to door opening functions and other opportunity work as part of ongoing facilities maintenance.
3. **Large Capital Improvements**: Major renovations and remodel projects include addressing existing non-compliant major space and facility components with reconstruction. This work requires professional architecture and engineering design services and general contractors. This would most typically include bathroom remodels and site work improvements.

4. **New Construction**: New facilities offer the opportunity to provide thoughtful accessibility through compliance with current ADA standards as well as design for belonging.

Program Accessibility

For digital access to City programs and services, the City has created a required training track for employees to develop the skills needed to implement the digital accessibility rule component of ADA Title II compliance to support creation of accessible content and documents.

The City has identified the following standards for what makes digital program or service content accessible:

1. **Perceivable**: People can perceive content through at least one of their senses. Example: People who are Blind can use web content by having a screen reader read it to them.
2. **Operable**: People can use interactive elements, no matter how they are interacting with the content. Example: People who can't use their hands should be able to click buttons using dictation software.
3. **Understandable**: People should be able to understand what the content means and how to use it. It should be predictable and consistent. Example: People using any device or assistive technology should be able to identify links and understand what happens when they click them.
4. **Robust:** When websites are designed according to best practices, people should be able to use them on any device or with any type of assistive technology.

Barrier Removal Schedule

The ADA Transition Plan summarizes when identified physical accessibility barriers will be remediated and provides for regular and periodic review of that implementation schedule. Various City department representatives met with the ADA Coordinator, Safety Officer, and representatives of the General Services department in early 2026 to discuss effective remediation efforts and prioritization strategies. The Transition Plan remediation schedule is emerging and considerate of existing capital facility and transportation plans, needed departmental practice or policy changes, repairs and upgrades to be completed internally, as well as those completed through contracted third party vendors.

The City's ADA Transition Plan removal schedule proposes the following project implementation timeline:

Completed 2026 = Remediated following the collection of data in 2026

- Years 1-2 = Fiscal Years 2027-2029
- Years 3-5 = Fiscal Years 2030-2032
- Years 6-10 = Fiscal Years 2033-2037

Large capital projects and new construction projects, identified as two of the remediation methods, are included in the City's Six-Year Facilities Capital Improvement Program (CIP), which sets forth the City's facilities capital improvement projects for the ensuing six-year period. Additionally, the City's Long Range Facilities Plan (LRFP) expands the portfolio of anticipated capital projects, which through their scopes will address ADA deficiencies. As facilities are renovated or expanded to provide services, updates to building components in alignment with code requirements for ADA as well as universal design principles are implemented.

Transition Plan Phasing Schedules

CITY PARKS

All public City parks, open spaces, and recreational facilities were evaluated through the Self-Evaluation.

Accessibility barrier removal projects for public parks, trails, recreation and natural areas are considered in the City's 2022-2031 Parks, Recreation and Cultural Services Comprehensive Plan (the "Parks Plan"), specifically through adopted Level of Service Standards, including assessment and improvements to accessibility that include in ADA requirements and universal accessibility design standards.

The Parks Plan provides that, when upgrading or renovating existing parks and recreation facilities, the City will add features that address ADA accessibility issues. Located throughout the City's parks and recreation system, renovations recommended in the Parks Plan included capital and noncapital projects for accessibility to facilities and programs.

Future playground improvements will follow the accessibility models set forth by the City's recent development of inclusive playgrounds at Esther Short Park, Marshal Park, and Fruit Valley Park.

Similar to other facilities, City staff is evaluating the self-assessment information to prioritize strategic improvements within existing resources and to guide future budget development.

CITY BUILDING FACILITIES

City-owned facilities that host City programs, services, and activities were evaluated. In facilities with both public and employee-only areas, only the publicly accessible spaces were evaluated.

The City's CIP List (2025-2030) includes:

- 521 SE Chaklov Drive (Major renovation and remodel)
- Fire Station 8 Seismic Update and Renovation (Major renovation and remodel)
- Vancouver Public Works Operations Campus (New Construction)
- Fire Station 3 Replacement (New Construction)
- Fire Station 6 Replacement (New Construction)
- Fort Vancouver Regional Library/Arts Hub Renovation (Major renovation and remodel)
- Fire Station 5 Renovation (Major renovation and remodel)
- Vancouver Police Headquarters (New Construction)
- Fire Station 4 Seismic Retrofit (Major renovation and remodel)

The City's Longer Term LRFP (2030 – 2035) includes:

- Vancouver Police East Precinct Renovation
- Vancouver Police Evidence Facility Renovation
- City Hall Remodel
- Marshall Center/Luepke Renovations
- Fire Station 1 and 2 Renovations

Additional Projects and Programs for City Facilities:
The City of Vancouver has established a Facilities Conditions Assessment program which is updated every five to six years. As part of this assessment program, ADA deficiencies are incorporated into the facility report. The City requests in each biennium budget cycle funding to address major

maintenance projects including addressing ADA deficiencies. The current 2027-2028 biennium budget will include a request for funding to develop an initial 10 year plan which will align observed barriers in city facilities with opportunities for removal based on the implementation methodologies provided. Additionally, accessibility during construction on open facilities and within the public rights-of-way adjacent to facilities under construction is of vital importance to the City. The City has developed a series of requirements that ensure accessibility is always maintained when construction activities impact the rights-of-way.



CITY PARKING LOTS

City-owned public off-street parking lots throughout downtown were included in the survey. These lots are not associated with a building, park, or other City-owned property. The City's inventory of public parking lots has decreased over time, and there are 10 remaining off-street lots the only facilities currently owned and maintained by the City. Public parking lot accessibility barrier improvements are primarily managed through the City's Downtown Access, Mobility, and Parking Plan adopted by the City in February 2025 and developed based on the City's existing conditions assessment findings and analysis conducted to help inform and formulate the Parking Plan. Disability accessibility improvements identified in the 2025 Parking Plan include:

- The City will look for immediate opportunities to add new ADA spaces at the curb and in public lots without a significant reduction in non-ADA designated spaces.
- New ADA spaces will be added where navigating to and from the vehicle is the most convenient and, where possible, at mid-block.
- As part of the City's work to upgrade payment technology for parking customers, payment options for persons experiencing disabilities will be enhanced. These enhancements include

"pay by phone" and "pay by (license) plate" options so people can pay and extend their visit without coming to the pay station or returning to their car to put a pay receipt on the dashboard.
- The City will also replace non-ADA compliant parking pay stations so all equipment is accessible.
- In addition to addressing the supply and accessibility of ADA spaces, the City will broaden communication about the availability of ADA parking and increase public awareness about ADA uses of public parking, including the rights of people with ADA placards to park in any legal parking space and load and unload in any loading zone designed for passenger loading such as at hotels and convention centers.
- All communication about accessible parking will be made in multiple languages and in collaboration with community partners to address the barriers that have historically restricted access to downtown for some communities.

CITY PEDESTRIAN RIGHTS OF WAY

The City takes a proactive approach to improving accessibility in public rights-of-way in accordance with the following implementation methodologies:

Curb Ramps

Following federal guidance, the City has upgraded curb ramps through its pavement management program for nearly 20 years. Currently, about 150–200 curb ramps are upgraded each year. Additional upgrades occur during development projects and capital improvements.

Sidewalks

In 2017, the City created a Sidewalk Management Program with a dedicated team.
Property owners are responsible for maintaining sidewalks next to their property under Vancouver Municipal Code 11.30.030. The City works with property owners to address hazards and defects. The team completes about 800–1,000 corrective actions each year.

The City also improves sidewalks through capital projects and development:
- In 2025, over 10,000 linear feet of new sidewalk were built through capital projects
- Nearly 7,000 linear feet were replaced through development review

Accessibility in Construction Zones

The City requires accessibility to be maintained during construction in or near public rights-of-way.
- Temporary Traffic Control Plans (TCPs) are required for any work affecting sidewalks, curb ramps, mobility lanes, travel lanes, or intersections
- Plans affecting pedestrian or mobility routes must be reviewed and approved before work begins
- Pedestrian routes must be maintained during long-term construction, especially in dense areas like downtown
- When needed, temporary routes may use areas such as on-street parking
- The City avoids detouring pedestrians to the opposite side of the street unless no other option is available
- Short-term closures may be allowed on a case-by-case basis with approval

Accessibility Improvements (2020–2025)

Since 2020, the City has completed many accessibility improvements through its transportation capital program. These projects support initiatives such as Complete Streets, Safe Routes to School, Vision Zero, and state and federal safety programs.

Examples include:

- SE 1st Street (Phases I & II)
- SE 34th Street
- NE 33rd Street
- NE 29th Street
- Jefferson/Kauffman Street
- NE 137th Avenue
- Fourth Plain Boulevard (multiple segments)
- Fort Vancouver Way
- Columbia Street
- Main Street
- McLoughlin Boulevard
- Mill Plain Boulevard
- SE Talton Avenue
- SE Tech Center Drive
- NE 68th Street

Existing Accessibility Gaps

The City maintains over 610 miles of streets. Many have sidewalks, but gaps remain:

- About 189 miles of streets have no sidewalks on either side
- Some intersections lack curb ramps, especially in older areas west of I-5
- Some traffic signals do not yet have ADA-compliant pushbuttons

The City is inventorying these locations and adding them to GIS to support future improvements.

Plan for Remediation

The City addresses accessibility gaps through several programs and plans.

- About 150–200 curb ramps are upgraded each year through the pavement management program
- This work will continue as funding allows.

Key planning documents include:

- **Transportation System Plan (2024–2044):** Identifies priority pedestrian and mobility networks
- **Six-Year Transportation Improvement Program (TIP):** Lists specific projects, timelines, and budgets

These plans prioritize areas with the greatest accessibility needs.

Typical Remediation Methods

The City uses several methods to address accessibility barriers:

- **Remove and Replace:** Fully rebuild non-compliant infrastructure (used for major issues like curb ramps or pushbuttons)
- **Modify or Retrofit:** Make targeted adjustments to meet standards (used for minor issues like small sidewalk shifts)
- **New Construction:** Build new infrastructure where none currently exists (such as adding sidewalks or curb ramps)



Part III: Progress Monitoring & Plan Management

This iteration of the Transition Plan and Self-Evaluation is a wayfinding mark of the City's rolling documentation of accessibility compliance remediations. Ongoing accessibility requires sustained attention, continuous improvement, and accountability.

The City continues to focus efforts on:

- Removing identified barriers to improve accessibility
- Ensuring new construction and reconstruction projects meet or exceed accessibility standards
- Updating the Transition Plan to reflect progress and newly identified barriers
- Planning future evaluations to maintain compliance and advance accessibility

The City's ADA Transition Plan is a living document. Accessibility needs evolve over time. Natural wear and tear, environmental conditions, and even routine maintenance can unintentionally create new barriers. Ongoing monitoring and periodic reassessment are therefore essential.

The City projects the following schedule for actions intended to occur before the next full City-wide Self-Evaluation update cycle.

Initial Actions (2027-2028)

- Publicly post the Transition Plan on the City's website and ensure it remains current and accessible.

- Provide technical reports to relevant City staff and contractors outlining identified accessibility barriers and recommended corrective actions.

Ongoing Actions (As Needed)

- Add newly identified accessibility barriers to the Transition Plan as they arise.
- Evaluate all new construction and major renovations for compliance with current accessibility standards.
    - Any new barriers identified will be added to the Transition Plan.
    - Previously identified barriers that are resolved through construction will be documented and removed from the Plan.
- Adjust remediation schedules as needed based on progress, funding availability, and updated priorities.

Annual Updates

- Incorporate scheduled barrier remediation into annual capital planning and budgeting processes.
- Document completed barrier removals and update Transition Plan data accordingly.
- Review the Transition Plan to ensure continued compliance and relevance.

Biennial Updates

- Reassess parks, playgrounds, and natural-surface areas (e.g., wood fiber, gravel, or other soft materials), which may degrade more quickly than paved surfaces.

Review Every 3-5 Years

- Develop, review, and update internal Universal Design guidelines for physical spaces and City policies.

Review Every 7-10 Years

- Collect and analyze updated transportation-related accessibility data (beginning in 2027) to align with evolving accessibility standards and regulatory guidance.
- Initiate a new comprehensive City-wide Self-Evaluation and Transition Plan process (target: 2034), covering all parks, facilities, and public parking lots.

The City of Vancouver's ADA Self-Evaluation and Transition Plan reflects both a legal obligation and a shared community commitment. Grounded in federal civil rights law and informed by the lived experiences of people with disabilities, this plan documents where accessibility barriers may exist, establishes a transparent framework for prioritizing corrective action, and outlines a sustainable path forward. Accessibility is not a one-time project or a static checklist — it is an ongoing City responsibility requiring vigilance, partnership, and continuous improvement.

Through this Plan, the City affirms that meaningful access to programs, services, facilities, and civic participation is fundamental to community belonging. Implementation of this Transition Plan will be guided by data, access considerations, fiscal responsibility, and continued engagement with the disability community. As accessibility barriers are removed and inclusive practices are strengthened, the City moves closer to realizing its vision of “Vancouver for All” where all people — of every ability — can fully participate and thrive.



Part IV: Public Notice & Participation

PLAN LIMITATIONS

Vancouver's ADA Transition Plan is a living document intended to guide the City of Vancouver in prioritizing the removal of physical barriers from City facilities and public rights-of-way. The City is committed to making its programs, services, and activities accessible to all individuals. This Transition Plan and the Self-Evaluation will be updated periodically to reflect completed projects, changing priorities, and available budgetary resources. While the City of Vancouver makes every effort to identify and remediate accessibility barriers, this Transition Plan and the associated self-evaluation and survey data represent a snapshot in time. The inclusion of an item in this Transition Plan does not constitute an admission of liability or legal violation. Furthermore, not all existing facility limitations are listed, and the Transition Plan by necessity focuses on priority areas.

DESIGNATION OF RESPONSIBLE OFFICIAL

The City established a full time ADA Coordinator in 2023 to continue evolution of the ADA Transition Plan and implementation of the Self-Evaluation process. This position is also responsible for ensuring that all programs, services, and activities of the City of Vancouver are accessible to and usable by individuals with disabilities. They report to the Engagement and Access Director.

Jen Dugger Spalding, ADA Specialist
City of Vancouver Engagement and Access Department
415 West 6th Street
Vancouver, WA 98660
Email: ADACoordinator@cityofvancouver.us
Phone: (360) 726-7122, or 711 (WA Relay)

DIGITAL ACCESSIBILITY COORDINATOR:

Laura Shephard, Communications Director
Communications Department
Email: Laura.Shepard@cityofvancouver.us
Phone: (360) 487-8614

TRANSPORTATION DIVISION MANAGER (STREETS AND WALKWAYS):

Ryan Lopossa, Transportation Division Manager
Public Works Department
Email: Ryan.Lopossa@cityofvancouver.us
Phone: 360-487-7706

PROVIDING NOTICE FOR NONDISCRIMINATION

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA") and Section 504 of the Rehabilitation Act of 1973, the City of Vancouver will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities. We strive to ensure that every program, service, activity, and facility operated or funded by the City of Vancouver is accessible to people with disabilities. This statement can be found at www.cityofvancouver.us/accessibility/access-statements. The City's procedures for reporting potential accessibility barriers or filing a complaint to grieve alleged discrimination based are available at: Accessibility Barriers and Complaints -The City of Vancouver, WA

Appendices

- Appendix A – Public Notice, Accommodations, and Grievance Procedure
- Appendix B – Glossary of Terms
- Appendix C – City of Vancouver Contact List
- Appendix D – Transition Plan Project Plan Links

Appendix A – Public Notice, Accommodations, and Grievance Procedure

ADA COORDINATOR

Jen Dugger Spalding
Engagement and Access Department
Email: ADACoordinator@cityofvancouver.us
Phone: (360) 726-7122, or 711 (WA Relay)

REQUESTING ACCOMMODATION OR ALTERNATE FORMATS

Reasonable accommodations and services are provided upon request to people with disabilities so they can fully participate and equally enjoy all of what the City has to offer.
To request an accommodation for a City meeting, event, program, or activity, or to request alternative formats of printed materials, please send the information below to the City sponsor (department or individual) for the meeting/event that is currently inaccessible to you. If you do not know who the meeting/event sponsor is, please send the information to the City's ADA Coordinator (contact information above) as soon as possible:

- The requestor's name, address, email, and telephone number (if any)
- Type of accommodation needed
- For City event, meeting, program, or activity accommodations:
    - The name or title of the meeting, event, program, or activity for which the accommodation has been requested (if unknown, please provide a description).
    - The physical or online location where it will take place.
    - The day and time when it will take place
- For requests for materials in an alternative format:
    - The name or description of the City document or materials to be reformatted.
    - If the materials are being provided as part of a meeting, event, program, or activity, please provide more information on that.
    - What type of format is desired (e.g. Braille, accessible Word doc, audio recording, etc.)

Depending on the nature of the request, it can take time to determine reasonability and/or coordinate the provision of the accommodation. Therefore, please send your request as soon as possible but no less than 48 hours before the event.
All communications regarding requests for accommodations and alternate formats will be kept on file for at least three years.

FILING A COMPLAINT (GRIEVANCE)

If you feel you or another member of the public have been denied access to a City facility, meeting, event, program, service, or activity as a result of your disability, or if you feel you have been discriminated against because of a disability, send your complaint to the City of Vancouver ADA Coordinator (contact information above) as soon as possible but no later than 60 calendar days after the alleged violation.

All Complaints Should Include

- Your full name, address, email, and telephone number (if any);
- The full name of the person who was discriminated against (if someone other than yourself);
- The name and address of the program, service, activity, or facility where there is/was a concern;

- A description of the concern (include any relevant date(s) and/or name(s) of any city employees involved (if known); and
- Other information that you believe necessary to support your complaint. Please send us copies of any relevant documents but keep the originals for your own records.

Complaint Resolution Procedure

All complaints must be in writing, containing the name and address of the person filing them. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought. The ADA Coordinator (or designee) shall conduct an investigation of the complaint. This investigation may be informal, but it must be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint.

- Within 15 business days after receipt of the complaint, the ADA Coordinator (or designee) will meet with the complainant to discuss the complaint and the possible resolutions.
- Within 15 business days of the meeting, the ADA Coordinator (or designee) will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille or audio file. The response will explain the position of the City of Vancouver and offer options for substantive resolution of the complaint.
- In more complex cases, the ADA Coordinator (or designee) may ask for more time to interview witnesses or investigate further.
- If the response of the ADA Coordinator (or designee) does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 business days after receipt of the response to the Engagement and Access Director.
- Within 15 business days after receipt of the appeal, the Engagement and Access Director or their designee will meet with the complainant to discuss the complaint and possible resolutions.
- Within 15 business days after the meeting, the Engagement and Access Director or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

Additional Information about Filing All Complaints

- When the complaint implicates the ADA Coordinator as contributing to the accessibility barrier or discrimination they have experienced, the complaint will go directly to the Engagement and Access Director.
- When the complaint implicates the Engagement and Access Director as contributing to the accessibility barrier or discrimination they have experienced, the complaint will go directly to the Deputy City Manager. Appeals for such complaints would go to the City Manager.
- The City can provide alternative means of filing complaints, conducting investigative meetings, and providing responses to people with disabilities as an accommodation upon request. Please include the details of your accommodation request with your complaint.
- All written complaints received by the Engagement and Access Director or their designee, appeals to the Deputy City Manager, City Manager and/or their designees, and responses from these individuals will be retained by the City of Vancouver for at least three years.
- The availability and use of this complaint process does not prevent a person from filing a complaint of discrimination based on disability with the following:
    - Office for Civil Rights (for Title II complaints only)
    - Washington Department of Labor and Industries (for Title I complaints only)
    - The Equal Employment Opportunity Commission (for Title I complaints only)
    - The U.S. Department of Justice

- All formal grievances received by the ADA Coordinator, appeals to the City Manager and responses from the ADA Coordinator and City Manager, will be kept on file for at least three years.

This information can be found at www.cityofvancouver.us/accessibility/accessibility-barriers-and-complaints.

Appendix B – Glossary of Terms

ADA (Americans with Disabilities Act)
A federal civil rights law enacted in 1990 that prohibits discrimination based on disability in employment, state and local government services, public accommodations, transportation, and telecommunications.

ADA Amendments Act of 2008 (ADAAA)
Federal legislation broadened the definition of disability and clarified that the ADA should be interpreted to provide broad coverage and strong civil rights protections.

ADA Coordinator
The City employee designated to coordinate compliance with Title II of the ADA, respond to complaints, oversee implementation of the Transition Plan, and serve as a point of contact for accessibility-related concerns.

Auxiliary Aids and Services
Tools or services that ensure effective communication for individuals with disabilities. Examples include qualified sign language interpreters, captioning, assistive listening systems, Braille materials, and accessible electronic documents.

Barrier (Accessibility Barrier)
A physical, policy-based, communication-related, or procedural condition that limits or prevents equal access for individuals with disabilities.

Capital Improvement Project (CIP)
A planned public infrastructure or facility project that may include construction, renovation, or major upgrades.

Disability
A physical or mental impairment that substantially limits one or more major life activities, as defined under the ADA and clarified by the ADA Amendments Act.

Effective Communication
Communication that is as clear and understandable for people with disabilities as it is for others.

Living Document
A document intended to be updated regularly as conditions change, progress is made, or new information becomes available.

Most Integrated Setting
A setting that enables individuals with disabilities to interact with people without disabilities to the fullest extent possible.

Program Access
Under Title II, the requirement that public services, programs, and activities must be accessible when viewed in their entirety, even if every individual facility is not fully accessible.

Public Entity
State or local governments and their departments, agencies, or instrumentalities, regulated under Title II of the ADA.

Remediation
The correction or improvement of a barrier to bring a facility, service, or policy into compliance with accessibility standards.

Self-Evaluation (Title II)
An internal review conducted by a public entity to assess its services, policies, and practices for compliance with ADA Title II requirements.

Transition Plan (Title II)
A public document required under Title II when structural barriers exist. It identifies barriers, establishes priorities, and outlines a schedule for removal.

Undue Financial and Administrative Burden
An action that would be excessively costly, extensive, substantial, or disruptive when considering the overall resources of the public entity. Such determinations must be documented and made by an authorized decision-maker.

Universal Design
Design principles that create environments usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.

Vancouver for All
The Vancouver for All initiative is a city-wide initiative aimed at and intent on fostering a culture of belonging and inclusiveness in the City. By aligning with core values and implementing targeted, innovative strategies, the City of Vancouver aims to create an environment where every individual is valued and empowered. Through collaboration, accountability, and tailored support, this initiative not only seeks to eliminate access barriers for everyone but also build a stronger, more resilient and connected community for all.

Appendix C – City of Vancouver Contact List

2024-2026 DEPARTMENTAL ADA LIAISONS:

Tawny Mahrun	City Manager's Office (CMO)
Brian Bates	CMO-Communications
Koko Olszewski	CMO-Engagement & Access
Brent Waddle	Human Resources Risk & Safety
Rob Prociak/Keely Warren	Human Resources
Pat Kennedy	Vancouver Police Department
Melody Burton	Parks, Recreation, & Cultural Services
Stephenie Urick	City Attorney's Office
Megan Fletcher	Community Development Department
Maggie Derk	Community Development Department
Andrew Westlund	Economic Prosperity & Housing
Ryan Lopossa	Public Works - Transportation
Tim Buck	Public Works - Operations
Timmi Winther	Public Works
Aman Singh/Luigi Cartasegna	Information Technology
Wyatt Jones/Lam Vuong	General Services
Pam Chinn	Finance & Accounting
Tony Fletcher/Nathan Leek	Vancouver Fire Department
Samantha Moody	Vancouver Fire Department

Appendix D – Transition Plan Project Plan Links

- Transition Plan Project Page: ADA Self-Evaluation and Transition Plan Project -The City of Vancouver, WA
- Accessibility Barrier Portal: Origami Risk - Report an accessibility barrier
- City of Vancouver Open Data Hub – Curb Ramp Comparison: Curb Ramp Comparison | City of Vancouver Open Data Hub



City Hall | 415 West 6th Street | Vancouver, WA 98660 | cityofvancouver.us

MEMORANDUM

To: City of Vancouver

From: Alta Planning + Design

Date: April 2026

Re: Multimodal Evaluation and Active Trip Potential

Preferred Alternative Modeling

Introduction and Background

This memo summarizes the results of the project team's scenario modeling analysis as part of the Vancouver Comprehensive Plan Update. The evaluation focuses on the modeled changes in travel behavior related to short trip taking, multimodal travel, and changes in VMT per modeled household and job.

This analysis compares two scenarios: The No Action and Preferred Alternative in 2045, as modeled by the Southwest Washington Regional Transportation Council (RTC). The Preferred Alternative assumes densification in many neighborhoods throughout the city. Findings compare outcomes under the Preferred Alternative with those under the No Action Alternative.

This analysis is completed at the Transportation Analysis Zone (TAZ) level. TAZs are geographic areas RTC uses to analyze and predict travel patterns and demand in the RTC transportation forecasting model. Data for this analysis included 304 TAZs that were fully or partially within the City of Vancouver.

Results

Summary of Findings

- Residents and workers in Vancouver will contribute **fewer Vehicle Miles Traveled (VMT) per household** under the Preferred Alternative than under the No Action. While total daily VMT rises by over 524,000 (9.7%) due to population and job growth, VMT *per household* drops 6.2% and VMT *per household and job* drops 10%. Very few TAZs within city limits see an increase in VMT per household and job.

- The drop in VMT per household and job reflects the **increased mix of housing and jobs** in the Preferred Alternative, allowing for more mode shift because people can live closer to jobs and other destinations. VMT changes are summarized in **Table 1.**

- Average **daily trips per household** are expected to increase very slightly from 5.16 in the No Action to 5.28 in the Preferred Alternative. Most of these trips are expected to convert to active modes, which are captured by the model to only a limited extent.

Table 1: Summary of VMT changes

Metric	No Action	Preferred	Difference (#)	Difference (%)
Daily VMT[1]	5,380,954	5,905,133	524,179	9.7%
VMT per household	45.4	42.6	-2.8	-6.2%
VMT per job	43.7	38.0	-5.7	-13.2%
VMT per household + job	22.3	20.1	-2.2	-10.0%

- **Trip lengths** on average do not appear to be a major driver in the reduction of VMT per household and job. Modest decreases in trip length are seen in East Vancouver and around Fruit Valley (due to co-location of jobs and housing), with slight increases near regional destinations like Pearson Field, the VA Hospital, and Clark College. Overall, average trip lengths remain relatively stable between the two scenarios because the Preferred Alternative sees gains in trips of all lengths. However, new short trips bring new opportunities for mode shift.
- Multimodal infrastructure that makes biking and walking more comfortable can attract new users to **shift away from private vehicles** at rates higher than what is modeled. New short trips, spurred by new development and growth, are projected to be taken by private vehicles but have the potential to capture users who are interested in biking or walking but concerned about safety or other factors. This work can begin by focusing on areas identified as having high existing active trip potential in the Active Trip Potential Technical Memo.
- There is limited opportunity to quantify **mode shift** in this report because the Southwest Washington Regional Transportation Council (RTC) model is not sensitive to changes in mode share except for transit. However, increases in trip making likely reflect induced demand for active modes. As described in the Active Trip Potential Technical Memo, additional mode shift would be expected from short vehicle trips if active transportation infrastructure improves, allowing more people to have access to and feel comfortable walking or biking instead of driving for trips under three miles.

[1] Direct RTC model output for general vehicular traffic, including trucks

Job and Household Growth

Job and household growth are the key drivers of changes to modeled travel behavior in Vancouver and provide context for differences in projected outcomes across the city. In the Preferred Alternative, shown in **Figure 1**, job growth will be concentrated mostly along the periphery of Vancouver city limits, including Columbia Tech Center/Mill Plain, Pearson Field, Fruit Valley, and along Fourth Plain Boulevard. Moderate jobs growth is expected in most of the rest of the city. When job growth by TAZ is normalized by acre, as shown in the **Appendix**, it is less pronounced in Fruit Valley but still concentrated in Mill Plain and near Pearson Field.

Household growth, shown in **Figure 2**, will be concentrated in southeastern Vancouver along the Columbia River and Highway 14, along Mill Plain Boulevard, in West Minnehaha, and west of downtown. Normalizing household growth per acre, shown in the **Appendix**, has little effect on these patterns.

These job and household growth projections set the stage for understanding changes to VMT, modes, trip flows, and trip lengths, which are explained more in subsequent sections.

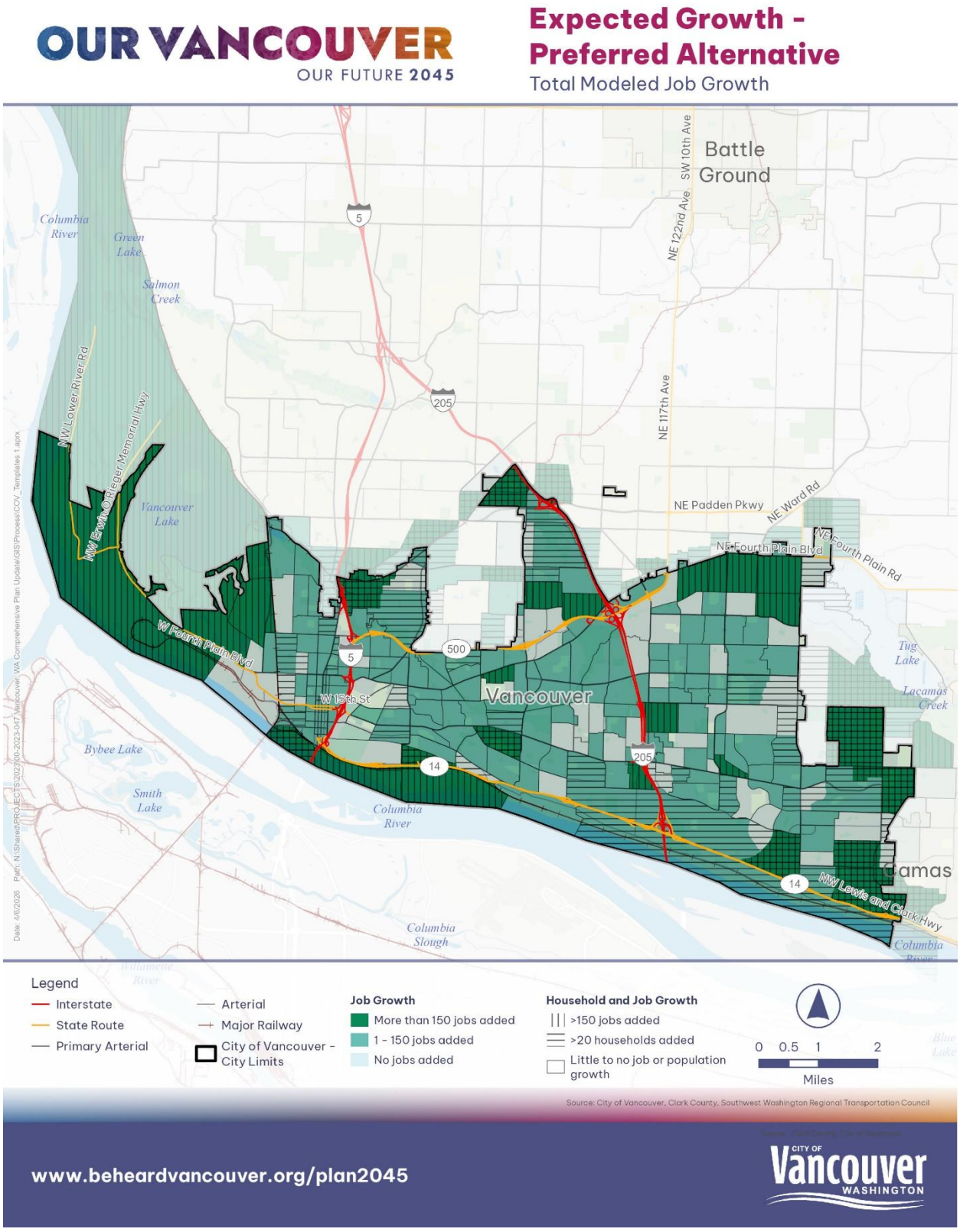


Figure 1: Preferred alternative total job growth

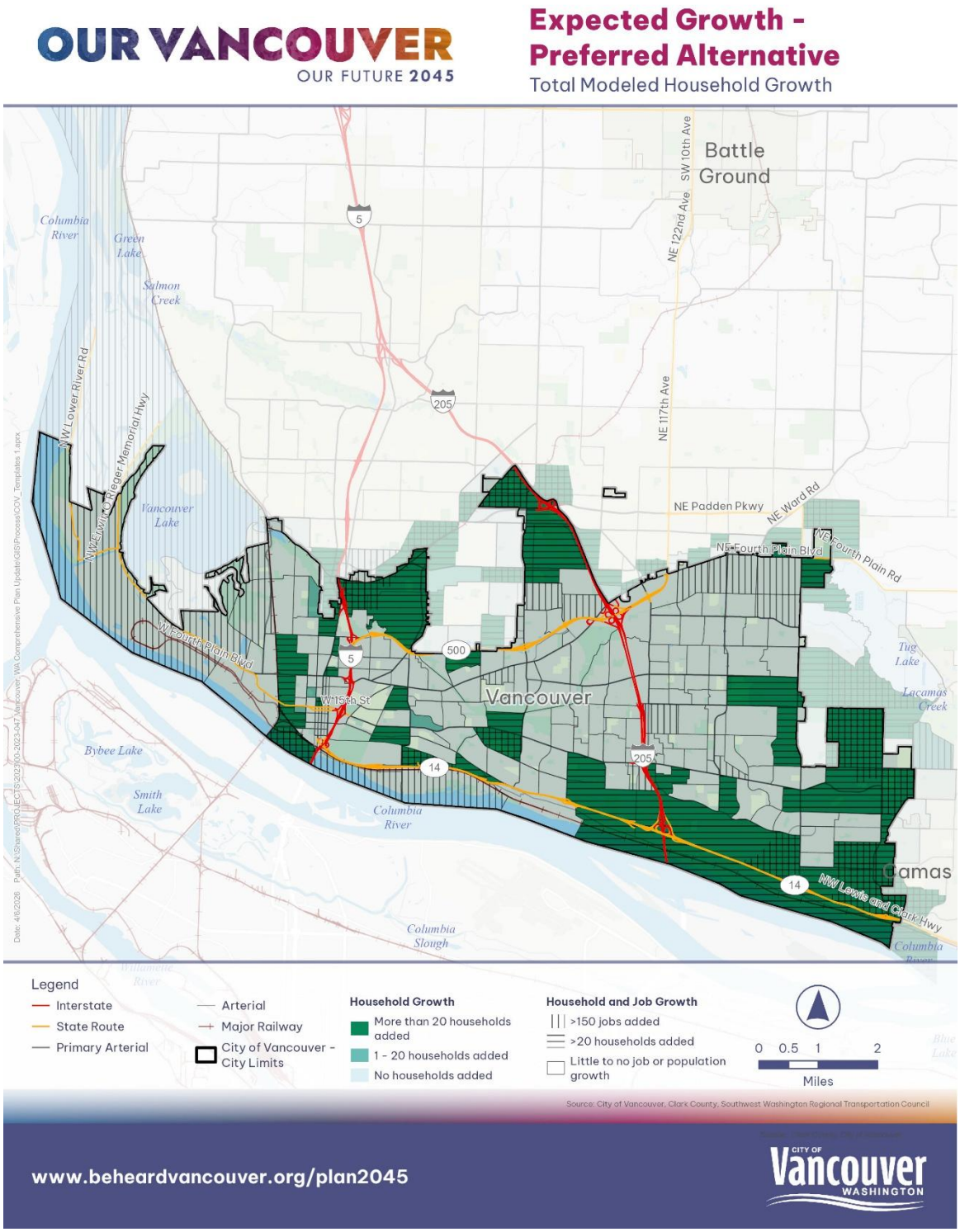


Figure 2: Preferred alternative total household growth

Vehicle Miles Traveled Changes

Changes in Vehicle Miles Traveled (VMT) between the No Action and Preferred Alternative differ throughout the city and intuitively, reflect whether the areas are adding jobs, housing, or both. Overall, VMT is projected to decline in relation to activity levels and growth in the City under the Preferred Alternative. While total VMT will increase by 9.7%, as would be expected with any new growth, what is important for climate and emissions modeling is how VMT will change *relative to expected growth*, which means it must be normalized. Changes in population and jobs somewhere in the region are inevitable, but land use policies that dictate where those changes occur can have wide-ranging impacts on VMT and therefore, greenhouse gas emissions and climate and emissions goals.

VMT changes are often normalized by household. This is useful in areas gaining housing, such as Old Evergreen Highway and Mill Plain, as it typically shows that a VMT per household decreases as residential density increases. However, on a TAZ level, the metric is misleading in job-rich industrial areas with little housing, such as Fruit Valley, because most VMT there is produced not by residents, but workers, leading to an inflated estimate. To account for this, VMT per job can also be used. This is useful for areas adding jobs, such as Fruit Valley and Mill Plain, but can produce the opposite effect in mainly residential areas. To account for growth in both jobs and housing and their impact on VMT, this analysis also normalized VMT by the *sum of jobs and households* in each TAZ.

On a citywide scale, VMT per household/job is projected to decrease under the Preferred Alternative regardless of how it is normalized. **Table 2** includes various ways to quantify the VMT impacts of the Preferred Alternative on a citywide scale.[2] The total citywide increase in daily VMT expected from the Preferred Alternative compared to the No Action is 524,179. This is largely because this model assumes a growth in population and jobs in the city and does not account for reduced population elsewhere as people move to denser areas. This should be understood not as a negative impact for the city, but as a shift in VMT from other areas that are not gaining jobs or population. On the contrary, VMT *per household* decreases by 2.8 miles per household (-6.2%) compared to the No Action, and VMT per household and job combined decreases by 2.2 miles (-10%).

[2] TAZs with no jobs or households assumed in the model were not included in this analysis. This includes certain TAZs on the periphery that had slight overlap with the city boundary but were not included in the model because they had no parcels with population or jobs inside the city limits. Where this was the case, it was not possible to calculate a percent growth or a VMT per household and these TAZs were shown as null.

Table 2: Summary of VMT Changes

Metric	No Action	Preferred	Difference (#)	Difference (%)
Daily VMT[3]	5,380,954	5,905,133	524,179	9.7%
VMT per household	45.4	42.6	-2.8	-6.2%
VMT per job	43.7	38.0	-5.7	-13.2%
VMT per household + job	22.3	20.1	-2.2	-10.0%

On a TAZ level, VMT per job and household shows the most balanced picture of how density will contribute to the City's policy objectives. Changes by TAZ are illustrated in **Figure 3**. From this, it is easier to see that across the city, VMT typically decreases relative to the amount of development planned, indicating that the average worker or resident will travel by car less, even though there will be more workers and residents. Most of the city sees little change, while most of East Vancouver experiences a decrease. Only seven TAZs within city limits see an increase in VMT (shown in purple) when normalized this way; several of these TAZs contain K-12 schools, which attract trips that are not always reflected in population or job counts. Understanding VMT increases relative to development can help avoid penalizing an area for adding jobs or housing in dense areas and recognizes the benefits that denser development brings to society.

These findings are consistent with other industry research. The California Air Resources Board (CARB) Handbook (2021) reports that increasing residential and/or job density reduces both the length and number of vehicle trips by shortening commutes and putting more destinations within easy reach, thereby reducing VMT. GHG emissions are expected to mirror reductions in VMT. Although the length of trips was shown to have less influence in Vancouver, the model shows that the number of vehicle trips per person will decrease, leading to an overall decrease in VMT.

Maps that show only VMT change per job and VMT change per household are provided in the **Appendix.**

[3] Direct RTC model output for general vehicular traffic, including trucks

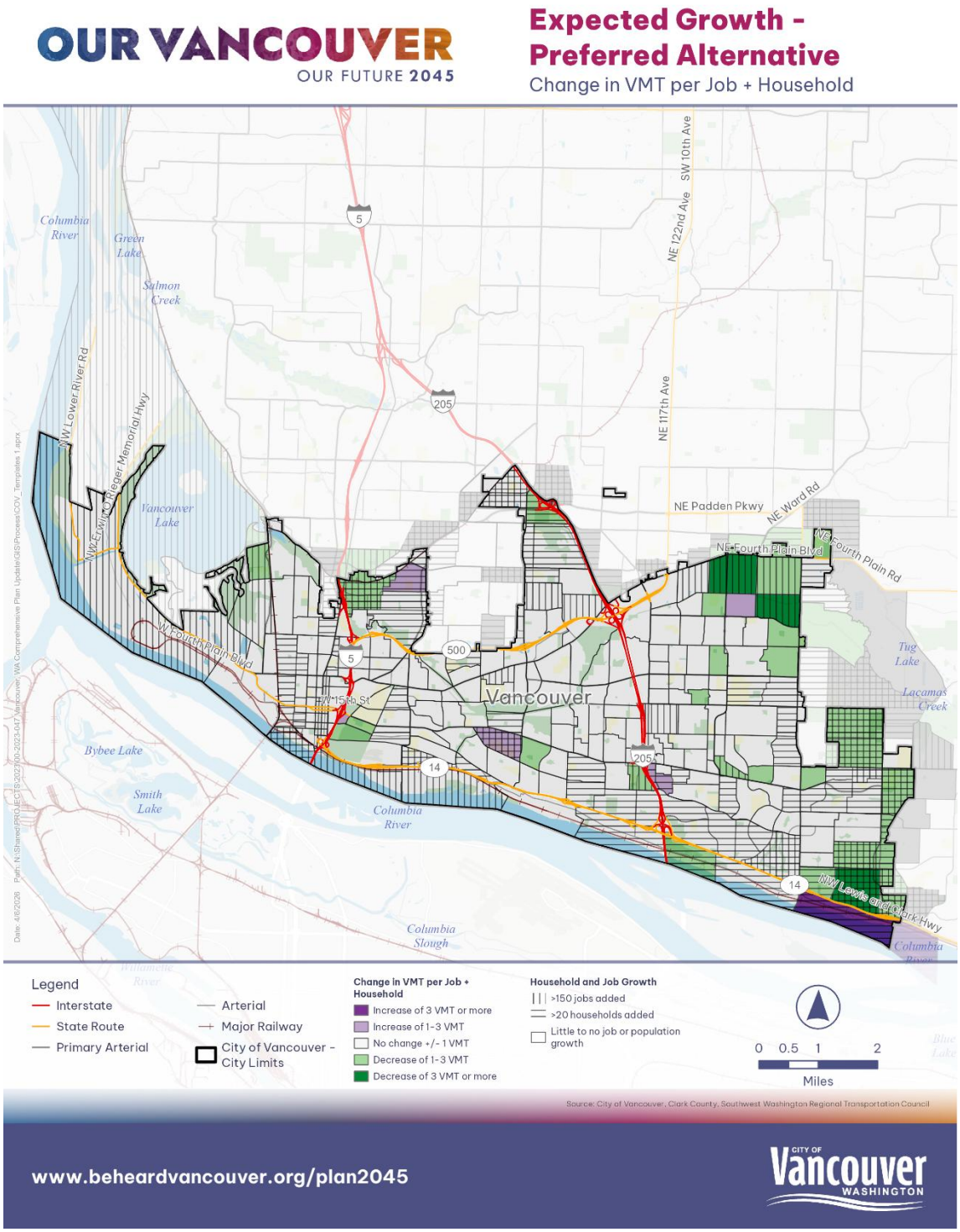


Figure 3: VMT per job and household

Factors Influencing VMT Changes

The expectation that VMT per job and household will decrease overall is the most important finding for climate and emissions modeling. However, it can also be useful to understand why these VMT changes occur – whether in people making shorter trips, fewer trips, or some combination. The following sections explore the factors that influence VMT change and posit that mode shift is the primary factor explaining this shift.

Changes in Trip Flows and Trip Counts

The project team analyzed trip counts and trip flows across the city and found that the number of daily trips per household is expected to increase only slightly, from 5.16 trips per household to 5.28 trips. This is to be expected, because density will put more destinations within reach of more people, but it means that the reduction in VMT per household cannot be attributed to fewer trips per day.

Although residents may take as many or more trips in the Preferred Alternative, what is most important for emissions outcomes is how long the trips are and if they are taken by vehicle. These factors are explored more below.

Changes in Trip Lengths

Average trip lengths in the Preferred Alternative are projected to change slightly compared to No Action. The average trip length decreases only slightly, from 4.24 miles to 4.16 miles. Meanwhile, the share of trips that are under three miles increases only slightly between the No Action and Preferred Alternative, from 53.5% to 53.6%. However, the higher number of trips overall means that there are still more short trips expected to occur in the Preferred Alternative.

Figure 4 shows how average trip lengths originating in each TAZ are expected to change with the Preferred Alternative. Most of the city shows relatively stable projected trip lengths under the Preferred Alternative, despite projected household and job growth in many areas causing more trips overall.

Lengths of trips originating in East Vancouver and Fruit Valley are expected to decrease moderately. These areas have notable job growth, and combined with growth in housing nearby, they may attract more local workers. Conversely, trip lengths are expected to increase slightly around Pearson Field, the VA Hospital, and Clark College, the same area with decreases in short trips, in spite of household growth in some of those areas. New density in other parts of the city may draw slightly longer vehicle trips to these areas, even as other trips decrease in length. Overall, these variations by neighborhood do little to nudge the average overall trip length downward.

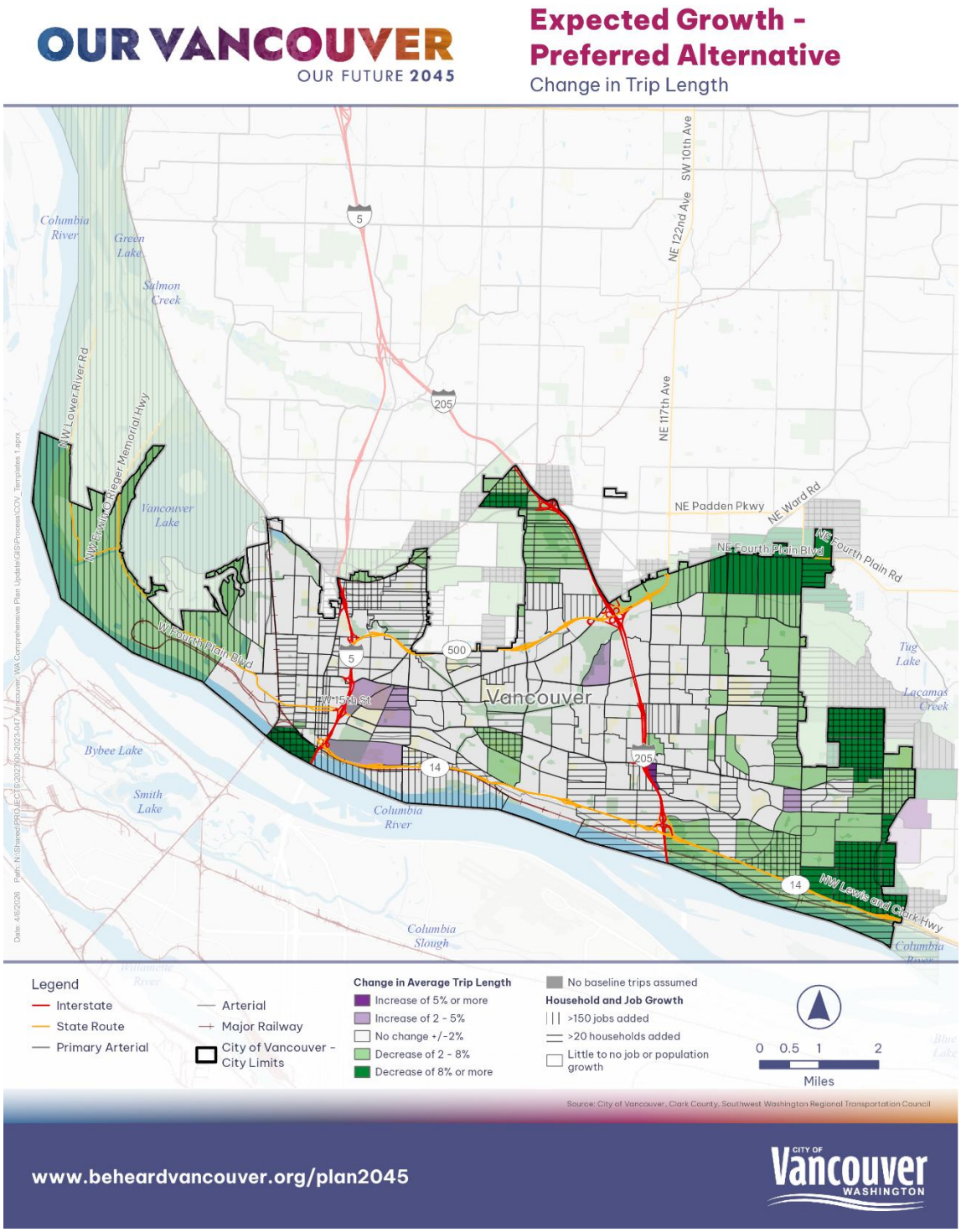


Figure 4: Changes in trip lengths

Changes in Short Trips

The project team also created flow maps of origin-destination lines of modeled trips under three miles of all modes for the No Action and Preferred Alternative as well as the difference between the two. Although the share of trips that are under three miles is expected to change very little, from 53.6% to 53.5%, and trip lengths themselves will also change only minimally, more trips overall will translate to more short trips. The Flow Map, linked here and previewed in **Figure 8**, shows trip flows in three views: No Action, Preferred Alternative, and Difference. The Difference map shows where these short trips are expected to increase (in red) and decrease (in blue) with the Preferred Alternative compared to No Action. Clustering can be adjusted in the Settings at the bottom left to provide more or less detail by changing the degree to which trip flows are aggregated into lines.

The Differences map shows a net increase in short trip flows between most origin-destination pairs. Increases are especially pronounced in and around Fisher's Landing, Columbia Tech Center, Burnt Bridge Creek, and Sunnyside-Walnut Grove. Net decreases are expected primarily around Fort Vancouver, the VA Hospital, and Clark College area, as well as Fourth Plain Village and some residential areas in central Vancouver. The former are all regional destinations that are likely to attract trips from beyond the neighborhood, so new density in other parts of the city may cause a shift to longer trips.

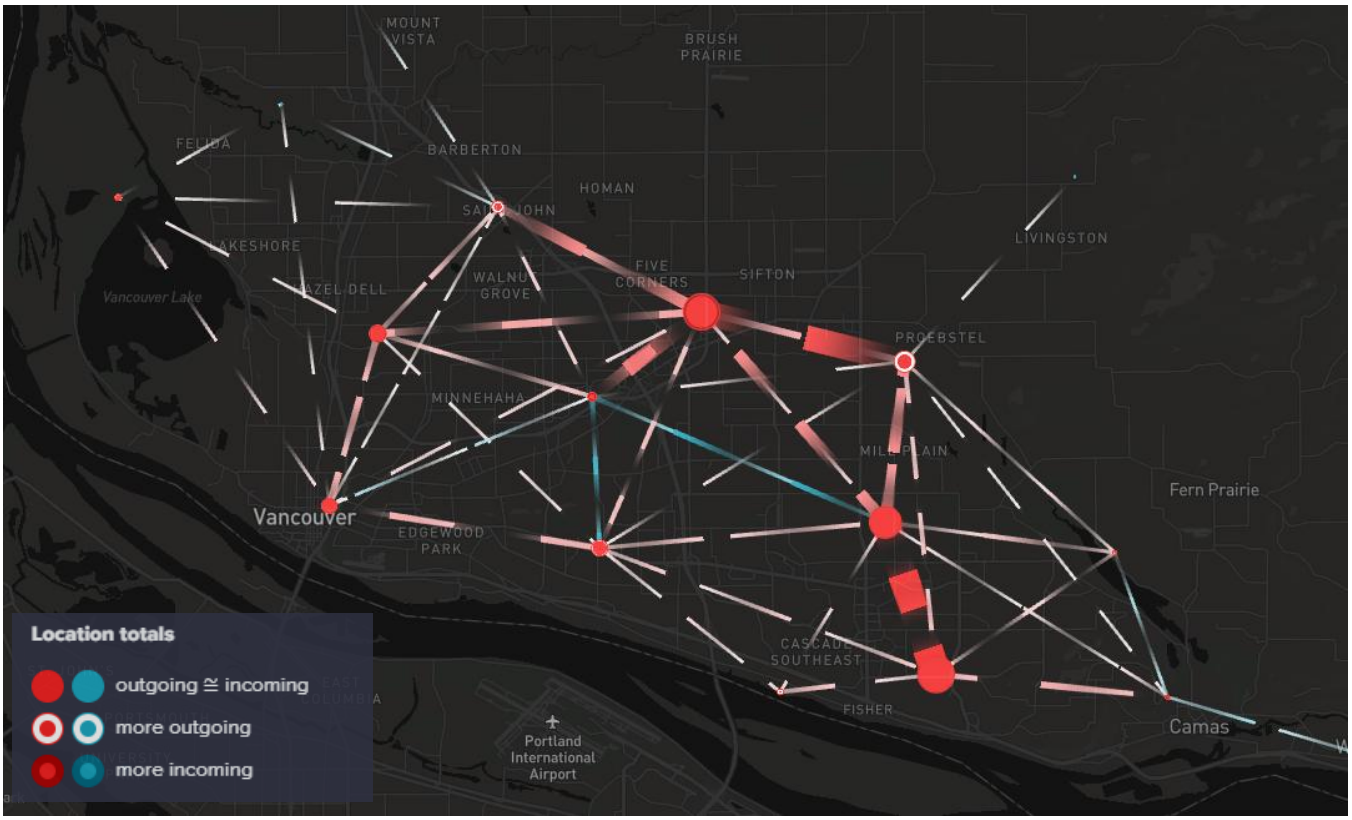


Figure 5: Differences in trip flows show flows with more net short trips (red) and fewer net short trips (blue)

This analysis can be thought of as a Preferred Alternative Active Trip Potential to complement the current Active Trip Potential completed earlier in the Comprehensive Plan Update process. Many of the short trips shown here, which are primarily by vehicle, can be converted to active mode trips if supportive infrastructure is provided. These findings can be examined alongside the current Active Trip Potential analysis to paint a more complete picture of where the most latent demand for active trips exists. While modeled flows show where people in 2045 will benefit from supportive infrastructure to shift to active modes, the current analysis shows where existing residents could benefit today. Focusing infrastructure investments in areas where both current and projected active trip potential are high will ensure that these new facilities can be the most useful to both current and future residents. **Table 3** samples different areas with different Active Trip Potential outcomes. Areas showing both high or moderate current potential and a projected increase under the Preferred Alternative should be prioritized for multimodal infrastructure improvements.

Table 3: Active Trip Potential - Current and Expected Change

TAZ Location[4]	Current Active Trip Potential	Change in Active Trip Potential Expected in Preferred Alternative
Columbia Tech Center	**High**	**Increase**
Burnt Bridge Creek	**High**	**Increase**
Downtown	**Moderate**	**Increase**
Fisher's Landing	**Moderate**	**Increase**
Vancouver Mall	**High**	**Varies**[5]
Clark College	**High**	**Decrease**

Changes in Modes

Density changes under the Preferred Alternative are expected to change mode share and trip counts across the City by allowing some short vehicle trips to be replaced by walking or biking in areas where new housing, jobs or amenities are added. Because trip lengths and frequencies are projected to change little with the Preferred Alternative, the project team expects that mode shift is primarily responsible for the modeled decrease in VMT per household and job.

However, the model does not accurately account for shifts to active modes, so data on mode shift from the model has been evaluated qualitatively. Model outputs are described below for context.

The model shows that overall, the areas expecting increases in walking and biking trips are also expecting increases in total trips; the same is true for areas expecting decreases. However, the mode share estimates show that the *share* of people choosing each mode is expected to change little even as the total number of trips fluctuates.

[4] Major landmarks are included for reference, but this analysis was completed at the TAZ level.
[5] Short trips to some destinations are projected to increase while trips to other destinations are expected to decrease.

Of all the net trip increase from walking, biking and driving expected with the Preferred Alternative, 87.8% of the increase is driving trips, 2.7% is biking trips, and 9.4% is walking trips. In reality, new trips would likely show a higher percentage of active modes due to densification. The expected shift to active modes is attributable to the increased mix of housing and jobs under the Preferred Alternative, allowing people to live closer to jobs and destinations.

Methodology

Data Inputs

This analysis used trip generation and travel output data from two travel demand model runs from the Southwest Washington Regional Transportation Council (RTC):

- RTC 2045 No Action – Assumes regional growth as defined under the current comprehensive plan, with less densification and fewer zoning changes.
- RTC 2045 Preferred Alternative – Reflects the Preferred land use and policy/infrastructure assumptions for the Comprehensive Plan update and will be evaluated relative to the 2045 No Action.

These outputs were extracted at the TAZ level.

Analysis Steps

The project team used tables on mode split, trip production by TAZ, person trip matrices between TAZs, and trip length by TAZ to summarize data by TAZ and then joined it to the TAZ shapefile for mapping. Key calculations and data preparation steps are described below.

- **Jobs and Household Growth**: The difference in No Action and projected jobs and No Action and projected households was computed from a shapefile with No Action and projected data by TAZ.
- **Changes in trip lengths**: Trip lengths by TAZ were accessed from a Trip Length by Zone table and joined to the TAZ shapefile. The percentage change between the No Action and Preferred Alternative was plotted.
- **Changes in Modes**: No Action and Preferred trips by mode were accessed from the Production Mode Split table. Mode share was calculated as the percentage of each mode's production trips out of all production trips at a TAZ level. Percent growth was calculated from the No Action and Preferred production trips by mode.
- **Changes in Flows**: The matrix of person trips by TAZ pair was reformatted to a longer table. For each TAZ pair, a trip distance was calculated using straight-line distances between block group centroids. In general, we expect that real-world distances would be longer, because they would be routed on the street network. The project team then input this table into a Flow Map to represent flows between origin-destination pairs and used the computed trip distances to create interactive filters. These trip distances were not used for VMT calculations.
- **VMT Changes:** Total VMT per TAZ was calculated by multiplying the average trip length by the number of produced or intrazonal person-trips driving alone or driving with a passenger for each scenario. This total VMT was then divided by household or job counts.

Conclusion

Considerations & Limitations[6]

This approach compares two RTC model runs to understand how the Preferred Alternative differs from the 2045 No Action. While this improves internal consistency relative to mixing data sources, the approach still has key limitations which are described below.

Model Assumptions

Scenario differences reflect the assumptions embedded in the RTC model. Results should be interpreted as model-based estimates rather than observed travel behavior.

One such assumption is an increase in jobs and households for the Preferred Alternative but no change in population. This is because population projections are provided by the WA Office of Financial Management separately from the modeling process. The DEIS demonstrated that while alternatives would result in more VMT overall because of more households, the VMT per household would decrease with added density because more trips are within reach of short trips or active modes. For the purpose of emissions reduction modeling, it is important to understand that an increase in VMT in the region would be accompanied by a decrease in VMT in other regions as households shift to urban areas. Thus, density provides a net benefit to the climate, but it must be viewed comprehensively.

The RTC model necessarily makes other assumptions about the network, travel costs, behavioral parameters, and land use inputs. If these factors deviate from what is assumed, results will likely change. RTC can provide more information about these assumptions.

Finally, the average trip lengths by TAZ provided by the model were not mode-specific; the estimates therefore reflect all modes combined. Therefore, this analysis assumed that the average vehicle trip length is equivalent to the average trip length. In reality, walking and biking trips are typically shorter than average and vehicle trips are longer, so this may lead to an underestimation of vehicle miles traveled. However, given the dominance of vehicle travel in most TAZs, this bias is unlikely to have much effect on estimating vehicle miles traveled.

[6] Claude Chat 1.1.9 was used to help draft the summary of findings and to brainstorm limitations for this memo. Final limitations were written and edited by Alta Planning + Design staff.

Geographic Extent

Boundary effects could cause a bias in this analysis. The analysis only models trips in Vancouver, so impacts to areas outside of Vancouver are not considered, but travel behavior does not respect city boundaries.

Model Sensitivity

The RTC model is not sensitive to mode shift. Vehicle trips that seem to disappear in the Preferred Alternative are assumed to shift to active modes, but the extent of mode shift is difficult to quantify for this reason.

Regional models may have limited sensitivity to fine-grained land use mix and urban design changes within a small number of zones. In addition, short-trip identification depends on the model's skim distances and how well they represent short local travel conditions.

Analysis Exclusions

This analysis did not evaluate changes in transit mode share in the Preferred Alternative, but the model accounted for transit and any expected transit shifts would be reflected in changes to vehicle, bicycle or walk trips.

Next Steps

This analysis illuminates how the Preferred Alternative will reduce VMT per household and job in Vancouver based on model assumptions. Although total VMT will increase due to higher population and jobs, those new residents will contribute less to VMT in a densified Vancouver than they likely would in another, more sprawling community or in the No Action Alternative. Allowing greater density of jobs and people will help reach climate and emissions goals primarily by reducing the number of trips an average household takes in a day by 1.1 trips, which in turn reduces VMT. If additional strategies are added that encourage more mode shift or make shorter trips possible, this could improve climate and emissions outcomes still more.

References

California Air Resources Board (CARB). (2021). Handbook for analyzing greenhouse gas emission reductions, assessing climate vulnerabilities, and advancing health and equity: Chapter 3—Transportation. https://www.caleemod.com/handbook/chapter_3_1transportation.html.

Appendix

The appendix provides additional context about job and household growth as well as changes in VMT:

- **Figure 10**: **Household growth per acre** complements the household growth map in **Figure 2** to normalize household growth per acre in the Preferred Alternative. Areas in southeast Vancouver and west of downtown will see the most growth in housing density.
- **Figure 11: Preferred Alternative Job growth** per acre complements the job growth map in **Figure 1** to normalize job growth per acre in the Preferred Alternative. Areas in East Vancouver and Fruit Valley will see the most growth in job density.
- **Figure 12: Change in VMT per Job** highlights areas where job growth leads to a decline in VMT per job in the Preferred Alternative.
- **Figure 13: Change in VMT per Household** highlights areas where household growth leads to a decline in VMT per household in the Preferred Alternative.

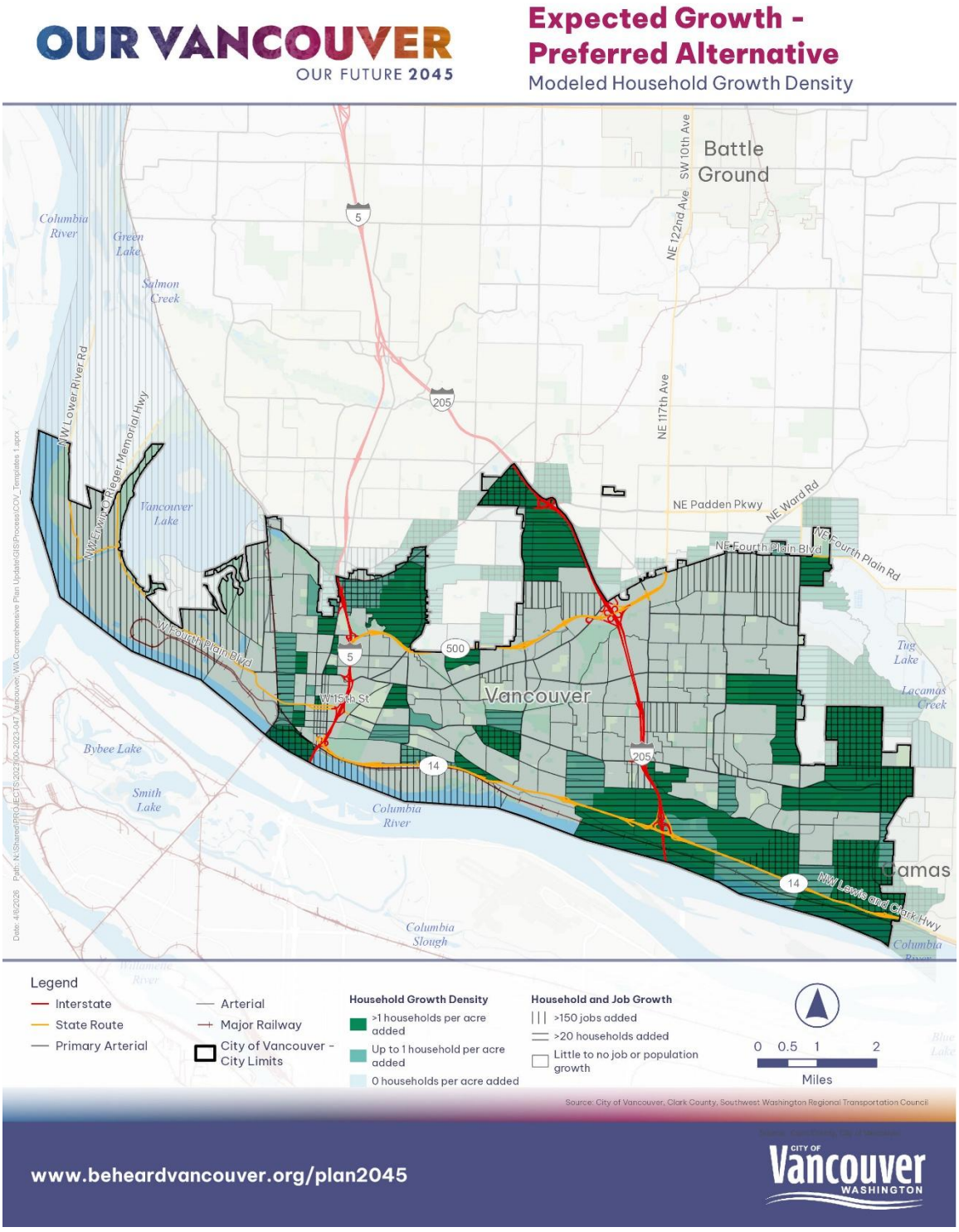


Figure 6: Preferred Alternative Household Growth per Acre

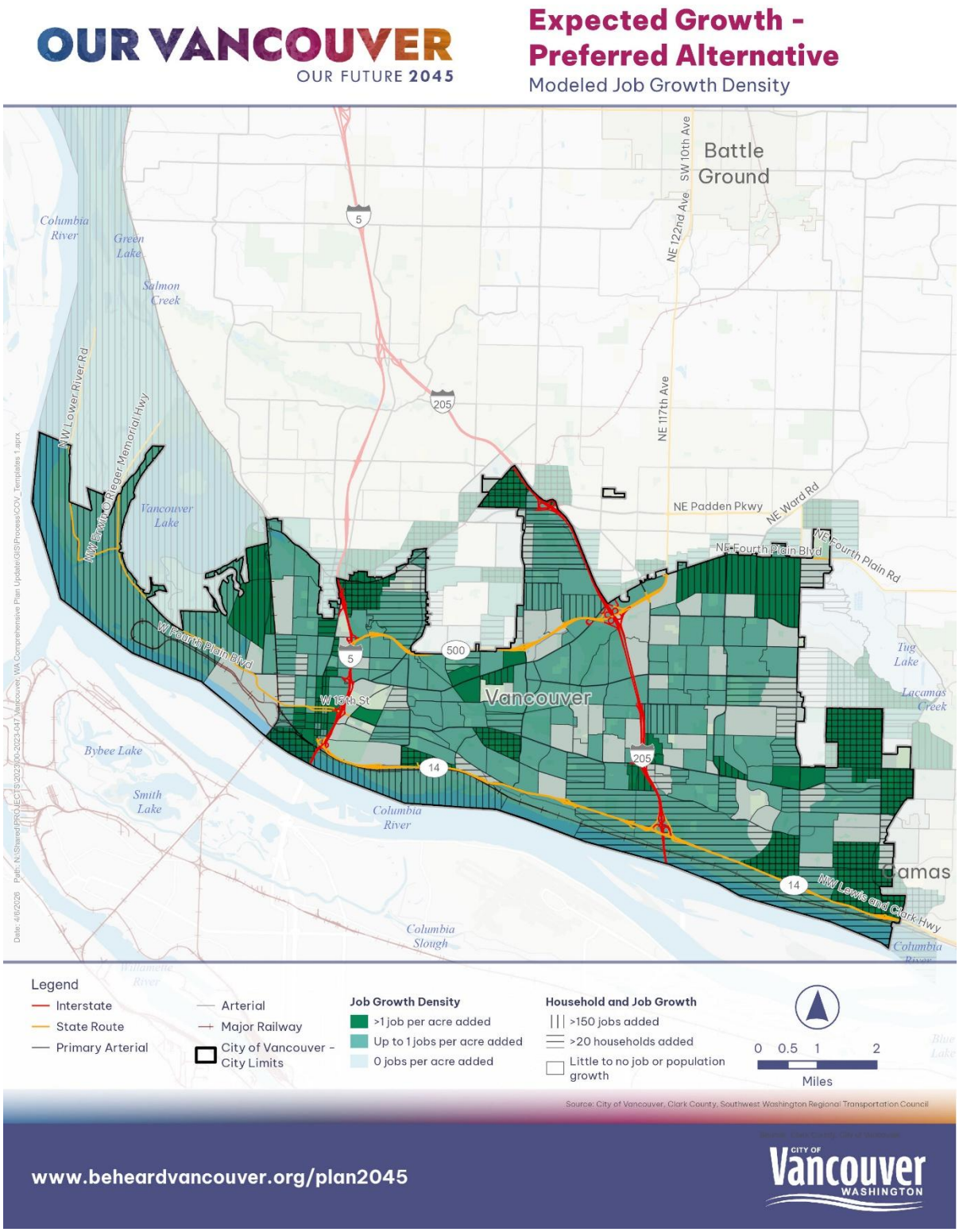


Figure 8: Preferred Alternative Job growth per acre

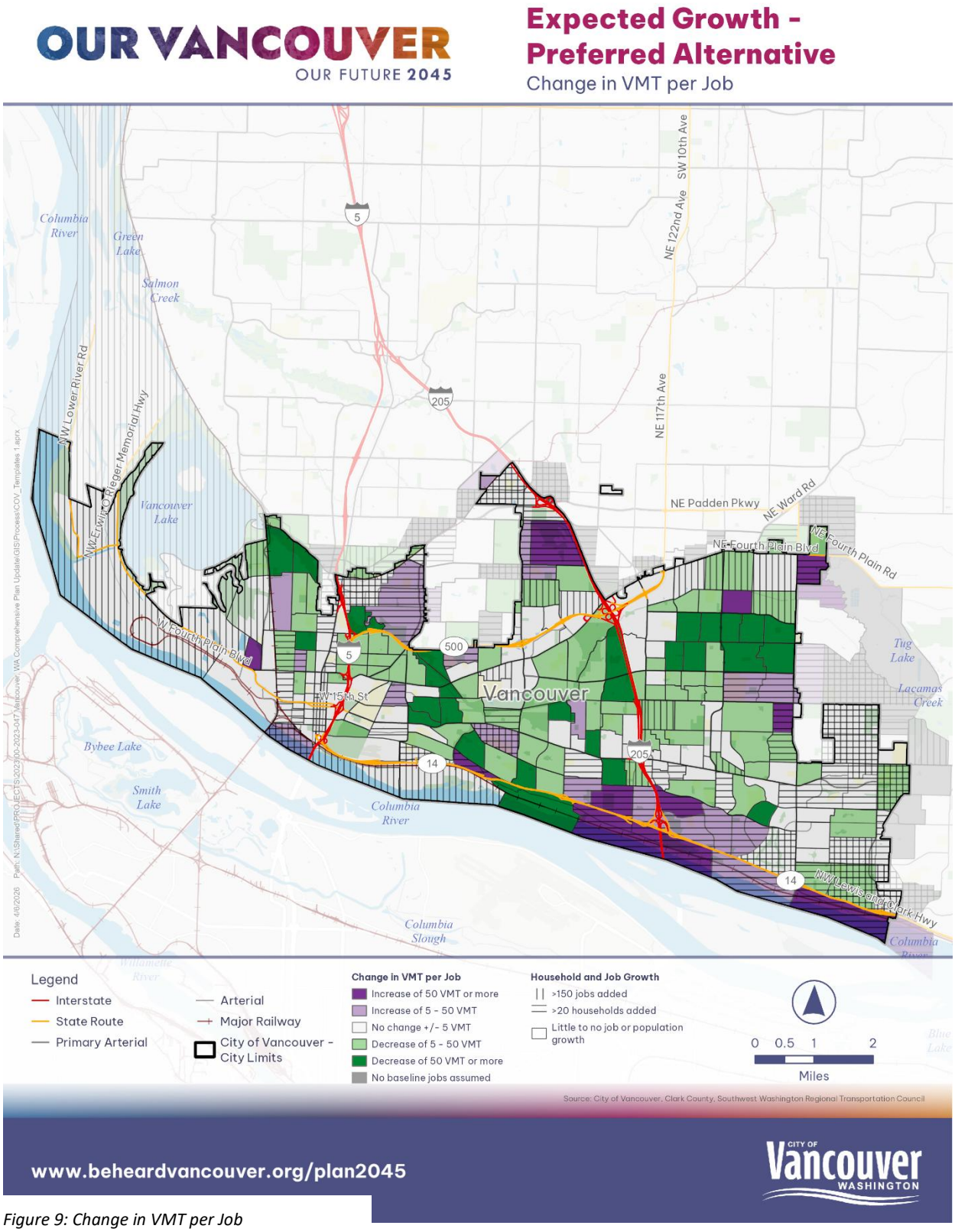


Figure 9: Change in VMT per Job

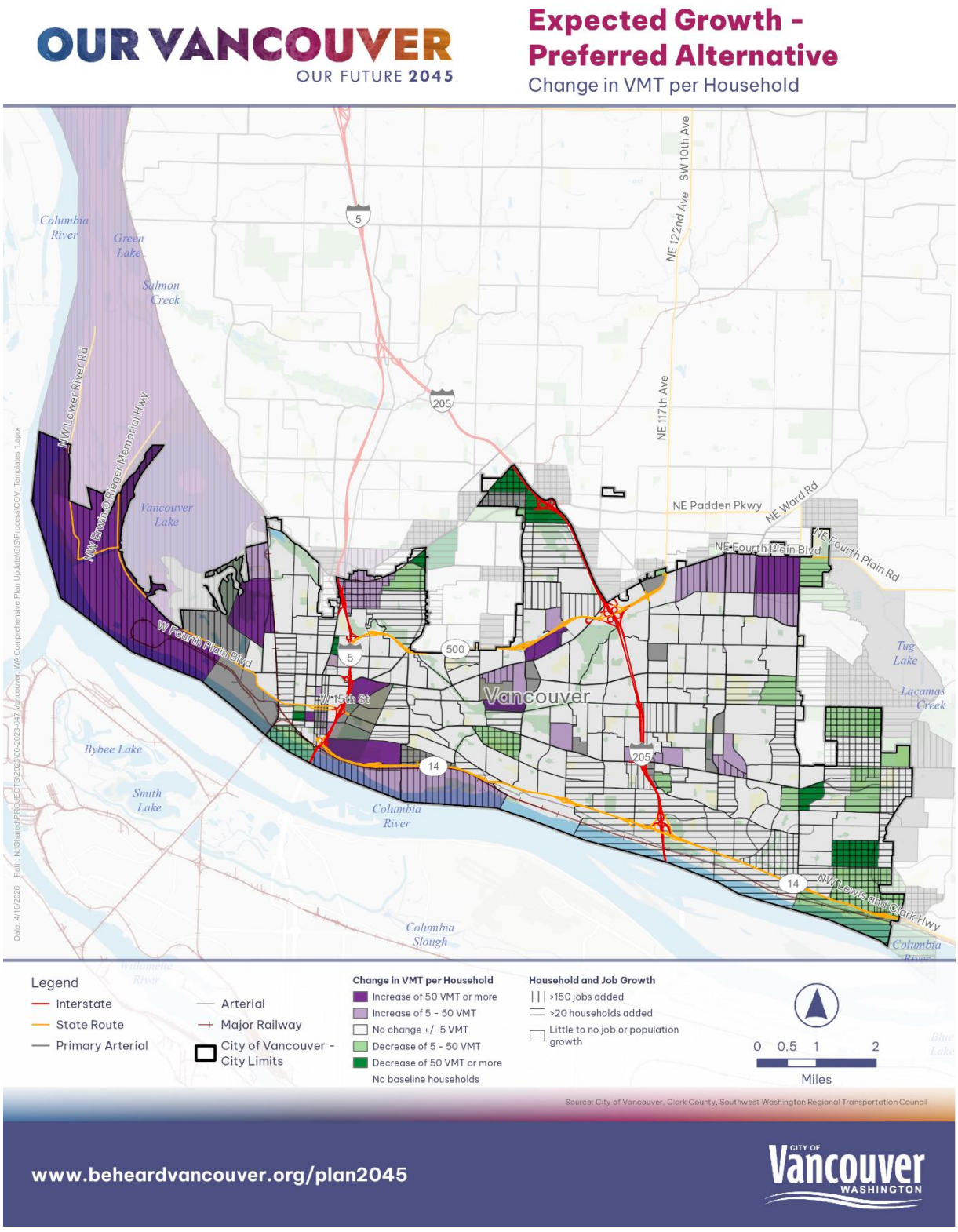


Figure 10: Change in VMT per Household

Appendix U – Full List of Plan Policies

Policy Name	Description	No	Associated Goal(s)
Access to Arts and Cultural Programs	Improve access to arts, cultural, and heritage programs by reducing barriers to participation, prioritizing underserved and historically underserved communities, and investing in related programs.	**1**	EI-1, PR-4
Access to Education and Employment	Reduce barriers to accessing education and employment opportunities, so all community members can reach their full potential.	**2**	EI-1, EO-1
Access to Non-Traditional Homeownership Methods	Broaden access to homeownership for first time owners, low-income residents, and other groups frequently priced out of through alternative ownership methods.	**3**	EI-1, H-4, H-5, H-6,
Access to Services and Amenities	Expand access to essential services and amenities through regulation and public investment and increase access in underserved areas.	**4**	PFS-1, EI-1, LU-1
Accessible Mobility for All	Promote universal design standards and mobility solutions for disabled, senior, youth, and low-income residents across all modes.	**5**	EI-2, EI-3, TM-1,
Acquire land for affordable housing development	Pursue strategic acquisition and utilize existing City-owned land for affordable housing.	**6**	H-6
Acquire Land for Public Parks	Acquire and reserve land for the development of parks for public use and recreation in areas experiencing growth, prioritizing underserved neighborhoods and areas currently not meeting parks service standards.	**7**	LU-3, PR-2
Adapt Infrastructure to Climate Change	Retrofit existing infrastructure, parks and natural spaces, and construct new facilities to adapt to the localized impacts that will occur in the community due to climate change.	**8**	CL-1, PFS-1, PFS-3
Adaptive Reuse	Support efforts to retrofit or repurpose underutilized buildings, structures and infrastructure for the development of new housing and commercial spaces.	**9**	LU-2, CL-3
Affordable Commercial Space	Utilize City-controlled real estate to provide affordable commercial leasing opportunities for small and emerging businesses.	**10**	EO-4, EI-1, EO-2

Affordable Homeownership	Facilitate homeownership opportunities through assistance programs, grants, and other methods that reduce barriers to entry for low- and moderate-income households.	**11**	H-5, H-6
Aging Populations	Ensure that residents have support for aging within community and downsizing through diverse housing options near accessible services and reliable transit to ensure long-term livability and independence.	**12**	EI-3, H-2
Airfield Compatibility and Airspace Protection	Ensure land uses, development patterns, and building heights in areas surrounding Pearson Airfield and PDX flight path are compatible with aviation operations and do not interfere with active airspace.	**13**	LU-4
Align Capital Improvement Program (CIP) with Comprehensive Plan	Maintain a prioritization process that aligns the Capital Improvement Program (CIP) with the goals and policies of the Comprehensive Plan and other relevant long term planning documents.	**14**	PFS-2
Align Place Based Investment with the Growth Concept	Align City investments, incentives, and programs to reinforce key centers identified in the growth concept as points for local economic development efforts and community investment.	**15**	CE-5, EO-4
Allow middle housing	Increase housing diversity by allowing a range of missing middle housing types (duplexes, triplexes, townhomes, cottage clusters, and courtyard apartments) in low- and medium-intensity residential areas to expand affordability and accessibility.	**16**	H-2
Analyze and Mitigate Displacement Risk	Analyze and mitigate for displacement pressures and risks prior to making large scale public investments.	**17**	E-1, H-2, H-4, PFS-1
Annexation Agreements Prior to Service Extensions	Continue to require developing or developed unincorporated areas to agree to future annexation as a precondition of the extension of City services.	**18**	AN-1, PFS-1

Annexation Appropriateness	Evaluate potential annexations to ensure they support the City's ability to provide and maintain adopted levels of service. Annexations should proceed only when they do not result in a reduction of service levels for existing residents and when necessary urban services can be provided in a timely, efficient, and financially sustainable manner.	**19**	AN-1
Annexation Boundaries	Annexation agreements should promote large annexations, efficient service delivery, the provision of necessary infrastructure, and clear jurisdictional boundaries. This includes contiguous areas and both sides of roads and streets and associated rights-of-way. Individual property owners should not be prevented from pursuing annexation, and requests should be facilitated when immediately adjacent to Vancouver city limits.	**20**	AN-1, AN-2
Asset Management	Manage City assets to balance full life cycle costs, performance, risk, and service levels, using best management practices and data. Public infrastructure and facility investments will leverage existing investments to support efficient and equitable growth.	**21**	PFS-2, TM-1, PR-1
Boards and Commissions	Ensure boards and commissions reflect community demographics, consist of diverse voices, and provide a meaningful role in decision-making and policy development.	**22**	EI-4
Broaden Equitable Access to Natural Spaces and Parks	Increase equitable access to natural spaces and parks by investing in new and improved facilities in underserved neighborhoods and siting new accessible housing close to existing and future parks.	**23**	CL-4, PR-3, H-1, EI-2
Build a resilient economy	Encourage business growth, retention, and expansion, with an emphasis on family-wage jobs and foster resilience within Vancouver's economy.	**24**	LU-2 CL-1, EO-3
Campuses	Support the growth and evolution of major institutional campuses as integrated community anchors that expand access to education, healthcare, and employment while maintaining strong physical, functional,	**25**	LU-1

	and social connections to surrounding neighborhoods.		
Center Impacted Voices in the Development of Community Spaces	Engage community organizations and individuals representing diverse lived and cultural experiences in the planning, design and programming of community spaces.	**26**	CE-1, CE-5 EI-1, EI-4, PR-4
City-Led Redevelopment	Invest in current and future City-led redevelopment efforts through property acquisition, community engagement, master planning, parks and infrastructure funding, and investment in affordable housing. Priority areas for City-led redevelopment include existing projects at Waterfront Gateway, the Heights, and the Fourth Plain Ops Center, and future projects at Library Square, and historically compatible investments at City-owned properties inside the Historic Reserve.	**27**	LU-1, EO-4
City-Supported Redevelopment	Participate in future public private partnerships to promote redevelopment on privately owned land in key areas around the City, including Downtown/Uptown Village/West Downtown, Van Mall, Columbia Business Center, Evergreen and Grand, the Mill Plain Corridor, and 136th near Firstenburg, and at Clark College, as well as other strategic locations around the City.	**28**	LU-1, EO-4
Climate Resilient Infrastructure	Incorporate elements of climate resiliency into new public spaces, buildings, and infrastructure.	**29**	CL-1, CE-1, PR-1, PFS-3, LU-3
Community Centers	Establish multipurpose community centers offering social, recreational, educational, and cultural programming, especially in underserved areas.	**30**	PR-3, PFS-1
Community Food Enterprises	Explore opportunities for community-owned and cooperative grocery store models to strengthen neighborhood food access where the private market fails to meet demand.	**31**	PR-3, LU-1
Community Gardens	Expand access to community gardens and incentivize urban agriculture to improve food security and increase healthy food options .	**32**	PR-3

Community Safe Routes	Create safe walking connections through programs that identify and invest in Safe Routes to Schools and Community Safe Routes that link people to transit and other important community destinations.	**33**	TM-1, TM-2, PFS-3, PR-2, CL-3
Community Streets	Develop guidance and encouragement for community use of the right-of-way, including plazas, parklets, "streateries," open streets events, public art, converting some low volume roadways into pedestrian only thoroughfares, and other demonstration projects.	**34**	TM-1, TM-4, PR-2
Conserve Land For Open Space and Environmental Preservation	Acquire environmentally sensitive land with ecological benefits for the purpose of conservation.	**35**	PR-2, CL-2
Conserve Lands Providing Employment	Conserve and invest in industrial lands and other areas that provide employment opportunities and family-wage jobs.	**36**	LU-2, EO-2
Conserve Water Resources	Encourage water-efficient technologies and practices to reduce consumption and ensure sustainable water availability amid climate change and growing demand.	**37**	CL-1, CL-4, PFS-1
Coordinate with Fire and Police	Coordinate with the Vancouver Fire Department and Vancouver Police Department to plan for expected growth, equitably serve the community, and facilitate emergency response.	**38**	CE-3, PFS-3
Cost Efficient Infrastructure	Design and maintain infrastructure to reduce long term maintenance and replacement costs. Consider lifecycle costs, emerging technologies, and the impacts of facility design and material choices in both capital and operating budgets.	**39**	PFS-1, TM-1
Crime Prevention Through Environmental Design (CPTED)	Foster a safe community by encouraging street level activity and thoughtful building and infrastructure design that enhance public safety and community well-being.	**40**	CE-3, LU-2
Culturally Responsive Design	Develop standards for public spaces and buildings that incorporate culturally-specific design principles and art installations and reflect the diverse history and heritage of Vancouver communities.	**41**	CE-5, CE-2, PR-4

Culturally Specific and Identity-Based Housing	Work with partners to facilitate and fund housing that reflects the cultures, identities and needs of Vancouver's unique population groups, and for the equity priority communities identified in this plan.	**42**	H-2, CE-2, EI-1, H-4
Disaster Recovery and Emergency Response	Develop plans and resources to ensure effective emergency response and recovery efforts in the event of natural disasters, climate-related hazards, and social disruptions.	**43**	CE-3, CL-1, PFS-3
Embodied Carbon	Prioritize local source materials, low carbon materials and material reuse in City-led infrastructure and redevelopment projects.	**44**	CL-3, EO-3
Emergency Rental Assistance	Provide financial support to help at-risk households remain in their homes, preventing eviction and displacement.	**45**	H-4, EI-1, H-3
Emerging Mobility	Prepare for emerging technologies by updating City policies and operational requirements for shared mobility and emerging mobility vendors, including Autonomous Vehicles. Create data standards, data sharing agreements, and vendor requirements.	**46**	TM-2, CE-4
Employment Centers	Direct new employment growth into Employment Centers with close proximity to housing, commercial activities, public services, employment and amenities.	**47**	LU-1, EO-2
Energy Efficient and Climate Resilient Buildings	Ensure that buildings contribute to the City's greenhouse gas reduction goals and protect occupants from pollution, extreme weather and other climate hazards.	**48**	CL-1, CL-3
Engage with Tribal Community Members	Foster meaningful partnerships with tribal communities and land stewards, integrating their knowledge, priorities, and cultural perspectives into local decision-making processes.	**49**	EI-4, CL-2
Enhance Port Access and Multimodal Freight Solutions	Improve infrastructure and connectivity to and from the Port of Vancouver to streamline freight operations.	**50**	LU-2, TM-3, EO-2
Environmentally Conscious Procurement and Maintenance	Include criteria related to the use of environmentally sustainable materials and practices in procurement processes and maintenance contracts.	**51**	PFS-1, CL-3

Equitable Transit Oriented Development	Tailor regulations, incentives and investments to facilitate development near current and future transit stations and make this development accessible to transit-reliant and historically excluded and underserved communities.	**52**	LU-1, LU-2, TM-2
Equitably Expand Tree Canopy	Utilize canopy assessment data and the City's Equity Index to prioritize areas for tree planting and greening investments.	**53**	CL-2
Equity and Climate Data	Incorporate the City's Equity Index, Displacement Risk Assessment tool, and climate vulnerability assessment in public investment and infrastructure improvement decisions.	**54**	EI-1, PFS-1, CL-1
Essential Public Facilities	Plan, site, and design essential public facilities through coordinated, equitable, and transparent processes that support regional planning goals, minimize community impacts, and ensure long-term benefit to all Vancouver residents.	**55**	PFS-2
Ethical and Fair City Processes	Promote ethical and fair governance by embedding accountability in City processes, ensuring access for historically excluded communities, mitigating bias, and fostering ethical use of technology and digital practices.	**56**	EI-4, CE-4
Event Programming	Continue to support and expand local gatherings, festivals and special events that uplift community, reflect diverse histories and lived experiences, and create a sense of civic pride.	**57**	CE-1, CE-5, PR-4
Expand Representation in Public Art	Ensure publicly funded art projects and installations reflect and incorporate the experiences of historically excluded and underrepresented voices in the physical and cultural landscape of the City.	**58**	CE-5, CE-2, PR-4
Facilitate Job-Creating Business Growth and Investment	Support businesses that create high-quality jobs by reducing barriers to growth, streamlining development processes, and ensuring access to necessary resources and infrastructure.	**59**	EO-2, EO-4, CE-4

Fiscal Sustainability of Annexation	Evaluate proposed annexations to ensure they are fiscally sustainable and support the City's ability to provide, operate, and maintain adopted levels of service over time. Annexations should proceed only when they do not reduce service levels for existing residents and when required urban services can be delivered in a timely, efficient, and financially sustainable manner.	**60**	AN-2
Fort Vancouver and the Historic Reserve	Protect and promote Fort Vancouver and the Historic Reserve as nationally significant cultural and historic assets. Support public investment, inclusive programming, and heritage-based economic development. Oppose efforts to reduce funding or public accessibility.	**61**	PR-4
Future Updates	Continue to update the Comprehensive Plan and implementing regulations in response to the annual review process, state mandated 5-year Implementation Progress Report, and 10-Year periodic review requirement that includes updates to long-term growth forecasts and regional land capacity analysis.	**62**	EI-4
Growth Concept	Use the Growth Concept and Comprehensive Plan Land Use Designations and updated zoning map to guide how and where growth and development occurs in the City.	**63**	
Habitat and Species Under Stress from Climate Change	Take inventory of and protect climate refugia, and fish and wildlife habitat needs for species under stress from climate change.	**64**	CL-2, CL-4
Health Access	Broaden access to essential healthcare and services for underserved populations and address built environment causes of health disparities.	**65**	EI-1, PR-3
Historic and Culturally Significant Resources	Protect and preserve significant cultural, historic, archeologic, and ecologic community resources. Promote preservation, restoration, protection, and rehabilitation of historic and architecturally significant structures, and heritage trees.	**66**	CE-5, CL-1, CL-2, PR-4

Housing Innovation	Promote and remove regulatory barriers to new financing methods, homeownership models and design and construction techniques.	**67**	H-1, CE-4
Improve Connectivity Between Parks and Open Spaces	Create an expansive network of linear parks that encourage active transportation, improve community health and wellbeing, enhance tree canopy and stormwater management, and link parks and open space with housing.	**68**	PR-2, PFS-1,
Inclusive Engagement	Foster inclusive, community engagement rooted in inclusion, trust, and long-term relationship-building. Center the voices of those who are most directly impacted by outcomes of City processes.	**69**	EI-4, CE-1
Inclusive Use of Technology	Utilize an equity lens to evaluate, assess, develop, and implement use of smart technologies to reduce embedded biases and provide inclusive and accessible access.	**70**	EI-4, CE-4
Income-Restricted Housing	Facilitate development of income-restricted housing, particularly in areas near transit and services.	**71**	H-2, EI-1, LU-1
Climate Resilient Development	Integrate climate resiliency best practices into the City's review of new development.	**72**	CL-1, CL-2, PFS-1
Incorporate Community Benefits into Development	Integrate community benefits into private developments involving discretionary land use approval or City redevelopment efforts while maintaining project feasibility.	**73**	H-4, EI-4
Incorporate Universal Design Principles	Incentivize universal design principles in private development. Support accessibility retrofits for existing homes and prioritize affordable housing options tailored to multi-generational living, aging in place, and a wide range of abilities.	**74**	EI-2, PR-1, H-2
Increase Access to Community Spaces	Facilitate and provide access to e community spaces, with a focus on populations vulnerable to social isolation.	**75**	CE-1, EI-2, LU-1
Increase Access to Space for Artists and Creatives	Establish partnerships that increase access to shared, affordable spaces serving artists and arts and cultural organizations.	**76**	CE-1, PR-4, CE-5

Increase Cultural Capacity	Strengthen Vancouver's cultural sector by investing in capacity building across arts, culture and heritage organizations as an economic and cultural driver of the community.	**77**	PR-4
Increase Food Access	Incentivize and remove regulatory barriers to locating grocery stores and neighborhood markets near housing and in underserved neighborhoods.	**78**	PR-3, LU-1
Indoor Air Quality	Improve indoor air quality for residents most susceptible to negative impacts from exposure to particulates, carbon monoxide, nitrogen dioxide, and lead.	**79**	CL-4
Intergovernmental Coordination of Annexation	Work with Clark County to facilitate annexation of the unincorporated Vancouver Urban Growth Area in a coordinated and orderly manner. Coordination should include County adoption of development regulations and infrastructure standards for the VUGA that are consistent with those of the City of Vancouver, agreements to maintain existing infrastructure prior to annexation, community engagement in annexation planning and implementation, and generally advance Vancouver as a provider of urban services and Clark County as a provider of social and regional services.	**80**	AN-1
Invest in Underserved Areas	Prioritize infrastructure, housing, and public service investments in underserved neighborhoods and areas of the City that have not benefitted from past investments.	**81**	PFS-1, EI-1
Language Access and Culturally Responsive Services	Ensure all City services are accessible in high impact languages spoken throughout the city and delivered with cultural competency.	**82**	CE-2, EI-4,
Limit UGA Expansions	Rigorously review any requests for future VUGA expansions to those clearly necessary to address forecasted population growth and associated housing and job needs, to reduce future annexation burdens, and to foster efficient long-term urbanization given finite countywide land supplies. Modeling of growth and associated land capacity needs should utilize generally acceptable best	**83**	AN-1, AN-2

	practices and reflect reasonable assumptions.		
Local Centers	Focus growth and investment in Local Centers to create compact, mixed-use districts along key corridors and intersections that provide daily goods, services, jobs, in a manner that complements uses in Regional Centers and the Urban Core.	**84**	LU-1
Low Carbon Fuels	Work with transportation, industry and utility partners to support the transition to low-carbon fuels.	**85**	CL-3, CL-4
Low Carbon Transportation Alternatives.	Adopt new technologies and invest in supportive infrastructure to increase the adoption of electric, hybrid, and alternative fuel vehicles to reduce community emissions.	**86**	CL-3
Low-Stress Bicycle and Small Mobility Network	Implement the city-wide low-stress bicycle and small mobility network that prioritizes safety and comfort for people of all ages and abilities.	**87**	TM-1, TM-2, TM-4
Maximize the utilization of existing on street parking	Implement strategic pricing mechanisms to regulate the availability of on-street parking in mixed use and regional activity centers.	**88**	TM-2, LU-4
Mitigate Noise Pollution	Reduce and mitigate noise pollution from major stationary and mobile sources, including air travel, vehicles, freight, railroads and high intensity industrial uses.	**89**	EI-1, CL-4
Mixed Income Housing	Develop incentives to integrate below market housing as part of new market rate housing projects.	**90**	H-5, H-6, LU-4
Monitoring Progress	Regularly review progress towards implementation of the Vancouver Comprehensive Plan goals and policies using the metrics identified for each policy, and update regulations and policies as needed to reflect changing conditions.	**91**	EI-4

Multigenerational Households	Incentivize development of housing types suitable for multigenerational living.	**92**	EI-3, H-2
Multimodal Level of Service	Update regulations and design guidance to reflect multimodal level of service standards that require private development and capital projects to advance multimodal safety and support shifts to non-drive-alone modes.	**93**	TM-2
Native Landscapes	Incorporate native plantings, food forests, and agroforestry into parks and public spaces to support food security, ecological health, and cultural knowledge sharing	**94**	PR-3, CL-2, EO-3
Neighborhood Centers	Develop Neighborhood Centers as accessible, neighborhood-serving districts that bring daily goods, services, and gathering spaces closer to where people live, supported by a mix of low- to medium-scale housing.	**95**	LU-1
New funding methods for affordable housing	Explore and develop additional funding methods and resources to support affordable housing and community ownership opportunities	**96**	H-1, H-6
Open Government	Ensure transparent and equitable access to government data by maintaining open, user-friendly platforms that allow community members to understand, engage with, and influence public decisions and investments.	**97**	EI-4, PFS-2
Optimize Freight Corridors	Designate and enhance freight corridors to facilitate efficient movement of goods and reduce congestion.	**98**	LU-2, TM-3, EO-2
Pedestrian Oriented Design	Ensure ground floor building facades, public spaces, and streets are designed at a human scale and provide comfort, accessibility and visual interest for pedestrians.	**99**	LU-1, TM-1
Periodically Reassess Land Use	Assure consistency of overall land use and capital facilities plans by reevaluating Vancouver's land use plan and code to ensure regulations are facilitating intended outcomes and the City is able to provide necessary public facilities and services to implement the plan.	**100**	PFS-1, LU-4

Permanently Supportive Housing	Expand the availability of permanently supportive housing and emergency shelter beds with integrated services for people with disabilities, houseless individuals, and at-risk populations.	**101**	H-3
Pilot Projects	Encourage the use of short-term pilot projects for park, transportation, and general infrastructure improvements before making long-term investments to foster innovation, test feasibility, and increase community buy-in.	**102**	CE-4, PR-2, TM-2, CL-1
Pollinator Habitats	Support a healthy urban ecosystem by embedding pollinator habitat into public and private development, prioritizing pesticide free landscaping, removal and reducing use of invasive species, enhancing biodiversity, and connecting natural spaces across the City though pollinator-friendly plantings.	**103**	CL-2, PR-2, PR-3, CL-4
Preserve and Protect the Columbia River	Manage the built and natural environment to protect and restore the water quality and habitat of the Columbia River basin, reflecting its central role in the City's identity, economy, history, and future.	**104**	CL-2, CL-4, CE-5, EO-2, PR-2, PFS-1
Preserve Existing Affordable Housing	Preserve the existing stock of affordable housing and discourage conversion of income-based housing to more expensive market rate housing when affordability restrictions end.	**105**	H-3, H-4, LU-1
Program Underutilized Spaces	Encourage the thoughtful reuse and activation of underutilized lands —such as space beneath freeway viaducts, oddly shaped parcels, utility corridors, temporarily vacant lots - and other non-developable remnants typically under 1 acre—by establishing public private partnerships to program them to serve community, cultural, and environmental needs	**106**	CE-1, CE-4, LU-4, PR-2
Proportional Fees	Establish proportional impact fees and system development charges based on size of unit for residential uses while ensuring cost recovery.	**107**	PFS-1, LU-4
Protect and Restore Critical Areas and Shorelines	Protect critical areas, shorelines and other ecologically significant areas, ensure no net loss of ecological function through avoidance and mitigation of impacts, and apply	**108**	CL-2

	conservation design principles to restore and enhance degraded areas.		
Public Safety	Support public safety through investment in emergency services, facilities, infrastructure and coordinated preparedness efforts that strengthen community resilience and response.	**109**	CE-3, PFS-3
Reduce Built Environment Emissions	Reduce emissions from buildings, structures, and, infrastructure in the community.	**110**	CL-3, PFS-1
Reduce climate impact exposure to Vancouver's neighborhoods.	Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.	**111**	CL-1
Reduce displacement in the face of new growth	Implement anti-displacement strategies and actions that protect residents and businesses in advance of public investment so communities can remain in place and benefit from improvements.	**112**	H-4, EI-1
Reduce Environmental Health Disparities	Focus on areas with high environmental health disparities when mitigating the impacts of air, water, heat noise, and light pollution.	**113**	EI-1, CL-4
Reduce Food Waste	Reduce food waste in the community, and ensure surplus food supply is directed to underserved communities without fresh food access.	**114**	CL-3, EO-3
Reduce Heat Island Effect	Minimize impacts of the urban heat island effect, reduce geographic temperature disparities, and safeguard vulnerable populations from the adverse effects of extreme heat.	**115**	CL-1, CL-2, CL-4
Reduce Impacts of Point Source Pollution on Housing	Avoid siting new housing near known stationary sources of air, water, heat and light pollution, and facilitate site and building design that mitigates impacts from stationary pollution sources for both new and existing housing.	**116**	CL-4
Reduce Solid Waste	Increase waste diversion rates through a system that minimizes landfill reliance, reduces greenhouse gas emissions, prioritizes composting and encourages resource recovery.	**117**	CL-1, CL-3, CL-4, EO-3, PFS-1

Reduce VMT and GHG Per Capita	Implement land use patterns that reduce vehicle miles traveled, traffic congestion, and associated greenhouse gas emissions per capita, while improving safety and air quality.	**118**	CL-3, CE-3, TM-2
Redundancy in Infrastructure	Design, construct, and maintain capital infrastructure systems with resiliency and redundancy to minimize the risk of system failure during natural hazards, climate-related events, or other disruptions. Prioritize investments that diversify supply sources, strengthen backup systems, and enhance adaptive capacity so essential services can be maintained or restored quickly in the event of a failure.	**119**	PFS-3, CL-1
Regional Centers	Develop Regional Centers as compact, high-intensity mixed-use hubs that provide a balance of housing, jobs, and services that complement the Urban Core, that are connected through the high-capacity transit network.	**120**	LU-1
Regional Infrastructure	Work with local, state, federal and tribal partners to ensure that new construction or replacement of critical infrastructure is planned and designed to avoid community harm and maximize social, environmental, and cultural value.	**121**	TM-1, PFS-1
Regional Planning	Coordinate closely with Clark County, other cities, and other government entities such as C-TRAN, the Regional Transportation Council (RTC), and school districts to sustainably manage urban growth areas, efficiently deliver urban services, expand regional transit and multimodal connectivity, and coordinate on shared goals and responsibilities, in accordance with adopted countywide planning policies.	**122**	LU-4, CL-3, TM-2, TM-1
Regional Trail and Open Space Networks	Work with nonprofit and private partners, Clark County and adjacent cities to build out the regional trail network for recreation and active transportation purposes.	**123**	TM-1, PR-2, CL-2

Resilient, Transit-Supportive Infrastructure	Invest in infrastructure that supports reliable, frequent, and accessible transit service as outlined in the Enhanced Transit Network, while adapting to localized climate impacts. Investments should xpand mobility options, improve neighborhood access, and deliver health, economic, and social benefits.	**124**	TM-2, PFS-3, EI-2
Resources for Youth and Aging Populations	Prioritize programs and infrastructure that support youth and aging populations, including safe play areas, accessible housing, robust childcare, public facilities and community programs that foster multigenerational interaction.	**125**	EI-3, PFS-1
Resources Near Transit	Locate community resources near current and future transit routes to ensure access for those most reliant on public transit.	**126**	LU-1, TM-2
Right of First Refusal and Sweat Equity	Explore models and opportunities for existing residences and businesses to have right of first refusal to purchase property when it's being sold, or build an equity stake in the property over time.	**127**	H-4, EO-1
Schools	Work with local school districts to provide adequate school facilities, including timely and efficient review processes for new facilities.	**128**	PFS-2
Service Areas	Work with Clark County, utility districts, and other regional service providers to ensure reasonable, efficient and fiscally sustainable service area boundaries and provide urban levels of service throughout planned annexation areas. Explore regional district service provision models that could lead to greater efficiency.	**129**	AN-1
Service Availability and Standards	Consider water, sewer, stormwater, solid waste, police, and schools as necessary public facilities and services. Ensure levels of service sufficient to serve planned development. Establish service standards and planning assumptions for estimating needed public facilities and services based on service capabilities, land use designations, and best management practices.	**130**	PFS-1

Service Transition	Identify strategies for facilitating phased transition of urban services, particularly public safety, transportation, parks, utilities, and land use review. This should include exploration of early application of land use regulations and infrastructure standards to ensure urban level of service in areas developed to urban densities within the VUGA.	**131**	AN-1, PFS-1
Sewer Service	Provide safe and sustainable sewer service throughout the City, connect remaining existing development served by septic to the public sewer system, and manage domestic and industrial wastewater to reduce health hazards and environmental impacts.	**132**	PFS-1
Shared Parking and Redevelopment of Existing Parking	Encourage shared parking strategies to improve land efficiency and reduce redundant parking supply. Incentivize the redevelopment of large, underutilized surface parking areas into more productive uses that support redevelopment and other community-serving needs.	**133**	LU-4, CE-1
Solar Access	Expand residential, commercial and industrial access to solar power to meet energy needs.	**134**	CL-1, CL-3
State Level Housing Reform	Advocate for state legislation, regulatory reform, and sustained funding that support condominium development, expand homeownership opportunities, and increase resources for the production and preservation of affordable housing across income levels.	**135**	H-1, H-2
Stormwater Management	Improve water quality, protect watersheds and reduce flood risks by promoting groundwater infiltration, reducing runoff, and advancing effective stormwater best management practices.	**136**	CL-1, PFS-1
Strategic Reuse of Excess Right-of-Way	Analyze suitability of excess and unneeded ROW for adding tree canopy, native planting, nature spaces, and stormwater management systems.	**137**	CL-1, CL-2, LU-3, CL-4, PR-2
Streamline the Development Process	Simplify the development review process where feasible and as needed to reduce permitting timelines and improve housing costs.	**138**	H-1, LU-4

Street Connectivity	Adopt connectivity standards to improve pedestrian and small mobility safety and accessibility. Apply standards to development, capital, and planning projects including maximum block length, unconnected streets, cul-de-sac connections, linkages between land uses, and multiple access points.	**139**	TM-1, TM-2, TM-4, LU-3
Street Standards	Adopt updated street standards that facilitate evolution to a safe, comfortable, and accessible multimodal transportation system.	**140**	TM-1, TM-2, TM-4
Strengthen Neighborhood Business Districts	Ensure neighborhood business districts are safe, vibrant, and accessible hubs of economic activity through strategic public and private investment, and reflect a sense of community identity.	**141**	EO-4, CE-5
Subarea Plans	Develop subarea plans for centers identified in the Growth Concept and areas called out in the Equitable Development Strategy to facilitate the development of integrated residential, commercial, employment and community uses, including in the following areas: Central Mill Plain (Heights to Peace Health), 136th/137th Corridor, Vancouver Mall, St. Johns/St. James couplet, Fourth Plain Corridor, Downtown, Upper Main Street and Walnut Grove, 164th Corridor, and 192nd Corridor.	**142**	LU-1, EO-4
Support Access to Childcare	Support the development of new childcare facilities in the City and eliminate regulatory barriers preventing their creation.	**143**	EI-3, EO-1
Support Active Transportation Investments	Improve active transportation in areas with inadequate mobility infrastructure to increase the share of trips made by foot, bike and other small mobility options, and transit, including better integrating parks and trails into the active transportation network.	**144**	TM-1, PFS-1
Support Decentralized Infrastructure Systems	Support decentralized local energy and water solutions while strengthening community adaptability to environmental, social, and economic changes.	**145**	PFS-1, CE-4, PFS-3
Support Local Business Transition to the Green Economy	Support local businesses in adapting to the localized impacts of climate	**146**	EO-3, LU-3

	change, and reduce their overall carbon impact.		
Support Locally Made Products and Art	Support and elevate Vancouver's local makers, artisans, and creative production sectors by promoting the use of locally sourced and recycled materials, strengthening small-scale manufacturing, and advancing a circular economy that contributes to community pride and place-based identity.	**147**	CE-5, EO-3, PR-4
Support Mental Health Access	Explore partnerships to expand access to culturally inclusive mental health, behavioral health, and physical health resources.	**148**	PR-3, EI-1
Support Neighborhood Organizations	Support the growth and stability of neighborhood associations as key partners in establishing local pride, connection, and representation within Vancouver's distinct neighborhoods.	**149**	CE-1, CE-5, EI-4
Support Small Businesses	Foster inclusive economic growth through education and resources that support small business owners, entrepreneurs and members of historically excluded and underserved communities.	**150**	EO-4, EO-1, EI-1
Support the Use of Renewable Energy	Encourage new renewable energy infrastructure and promote development of storage systems to ensure a stable, resilient, and sustainable energy grid.	**151**	CL-3, PFS-1
Sustainable Parks Funding	Identify and implement new funding strategies to support robust parks and natural area investments, ongoing maintenance and operation costs, and provide equitable access and level of service to all community members.	**152**	PR-2
Timing of Annexation	Coordinate with Clark County to establish annexation sequencing, agreements and timelines that facilitate annexation of the full Vancouver Urban Growth Area within the 20-year time horizon anticipated in the Growth Management Act.	**153**	AN-1
Tracking Progress and Reporting Back	Build transparency and accountability with the community through regular tracking of plan implementation and consistently reporting out on progress in an accessible manner.	**154**	EI-4

Transitions Between Zones	Develop regulations that provide transitions between zoning districts to ensure compatibility of adjacent land uses.	**155**	LU-4
Trauma-informed Services	Ensure City programs and policies are designed and delivered using trauma-informed care principles.	**156**	CE-2, CE-3, EI-2
Underdeveloped Lots and Brownfields	Prioritize, facilitate, and incentivize development on infill and underutilized lots, and clean up of brownfield sites.	**157**	LU- 3, LU-4, LU-1, PFS-1, CL-4
Urban Core	Focus the City's highest intensity of future growth in the Urban Core to reinforce it as the region's primary destination for services, amenities, nightlife and employment.	**158**	LU-1
Vancouver as an Innovation Hub	Position Vancouver as a center for innovation, technology, and entrepreneurship through public investment and attracting entrepreneurial talent.	**159**	CE-4, EO-2
Values Driven Budgeting	Ensure biennial budget decisions are guided by adopted policy priorities, with programs, projects, and services evaluated and prioritized based on their contribution to achieving those priorities. Require budget narratives and reporting to clearly demonstrate alignment with the City's mission, values, and community benefit, and to transparently document and publish outcomes and impacts.	**160**	EI-4, PFS-2
Water Service	Provide safe, clean, quality drinking water to every home and business, ensure water pressure and volumes necessary to support fire suppression systems. Encourage on-site water reuse systems where practicable.	**161**	PFS-1, PFS-2, PFS-3
Welcoming and Supportive Community	Build a community that welcomes and invites all community members to participate in civic life through inclusive practices, programs and public spaces.	**162**	CE-2, EI-1
Workforce Development and Career Pathways	Expand access to career pathways, workforce training, and entrepreneurship opportunities that lead to living-wage jobs and wealth creation, with a focus on underrepresented communities.	**163**	EO-1, EI-1, CE-4

CITY OF Vancouver WASHINGTON

Memorandum

Date: April 15, 2026

To: Rebecca Kennedy, Deputy Director, Community Development Department

CC: Patrick Quinton, Director, Economic Prosperity and Housing Department; Chad Eiken, Director, Community Development Department

From: Chim Chune Ko, Real Estate Project Manager, Economic Prosperity and Housing

Re: **Demonstration of Floor Area Ratio (FAR) Equivalency and Identification of Properties Exempt from Affordability Requirements for RCW 36.70A.840**

Purpose

This memorandum analyzes the City of Vancouver's existing zoning designations as well as provisions of the new development code that will be adopted as part of the City's 2026-2045 Comprehensive Plan update, to determine compliance with the Floor Area Ratio (FAR) standards established in RCW 36.70A.840(2)(a) and identify properties that are exempt from the affordability mandate per RCW 36.70A.840(2)(a)(ii) and (7)(b)(i). Though the City does not use FAR in its development code, this memorandum outlines the means and methods utilized to formulate a basis for "substantially similar" compliance.

Per RCW 36.70A.840 2(a), the City's updated Land Use and Development Code (VMC Title 20) is required to comply with the minimum station area FAR of 2.5. Current zoning districts that achieve this minimum station area FAR are exempt from the affordability requirements per section 7(b)(i) if they were in place prior to January 1, 2025. The City may also exempt an additional 25% of otherwise non-exempt properties per 2(a)(ii) if the proposed code achieves an FAR of at least 3.0.

Per RCW 36.70A.030, FAR is calculated as the ratio of total building floor area to the developable lot area. The current and proposed code do not use FAR, so the City is requesting a Substantially Similar Alternative Action to demonstrate FAR equivalency and notified the Department of Commerce of this intent on April 14, 2026.

Target Transit-Oriented Development (TOD) Standards

Under RCW 36.70A.840, The City is required to allow the following minimum average FAR thresholds within designated station areas to maximize state transportation investments:

- 3.5 FAR (minimum average) within 0.5 miles walkshed on public right-of-way of rail transit stops.
- 2.5 FAR (minimum average) within 0.25 miles walkshed on public right-of-way of bus rapid transit stops.
- +1.5 FAR (density bonus) for any project where all units are affordable or workforce housing for at least 50 years or are dedicated to permanent supportive housing

The City of Vancouver does not currently have any rail transit stops as defined in RCW 36.70A.030. However, our zoning must show compliance with the minimum average FAR for bus rapid transit station areas. A map showing station areas, and properties subject to these requirements is provided in Exhibit A.

Regulatory Alignment

The proposed new Land Use and Development Code applies an overlay to station areas to allow more flexibility and density around station areas regardless of the base zoning. These allowances include:

- No building height maximum regardless of the base height of the district
- No density maximums
- No parking minimums.

Since the City's proposed new zoning code imposes no maximum building height or density restrictions, there is effectively no maximum FAR. Even in the most restrictive zone (Low Scale Neighborhood District), all residential building type allows for 5-foot setbacks, ensuring that setback requirements do not artificially limit potential development. All zoning designations captured within station areas allow equivalent or less restrictive building types. As the code lacks an effective FAR ceiling, the minimum standards of 2.5 FAR, along with 3.0 FAR required to allow affordability exemptions for

up to 25 percent of bus station areas under RCW 36.70A.840(2)(a)(ii), and 4.5 FAR accounting for the affordability bonus required under RCW 36.70A.840(4), are all inherently achievable under the proposed new regulatory framework.

Exemptions

The following table outlines how development standards relate to Floor Area Ratio (FAR) for the existing Land Use and Development Code, that was in place prior to January 1, 2025, looking only at zoning designations that occur within a 0.25-mile walkshed of bus rapid transit stops. This analysis specifically evaluates building height and setback requirements as established in the code prior to January 1, 2025. Under RCW 36.70A.840(7)(b)(i), any parcel zoned for a density that "meets or exceeds the transit-oriented development density in subsection (2)" prior to January 1, 2025, is exempt from the affordability requirements.

Table 1: Existing Zones Within Station Areas

Zone	Allowed Height Above Grade (assumed floors)	Lot Coverage	Calculated FAR	Exempt from Affordability (Yes/No/Partially)
CC	50ft (5)	Varies [1]	Lots < .027 acres, FAR < 2.5 Lots > .027 acres, FAR ≥ 2.5 [2]	Partially
CG	None (infinite)	Varies [1]	FAR > 2.5	Yes

[1] A 5' Landscape buffer is required

[2] FAR = (Buildable Area * Number of Floors)/Site Area.

- FAR target = 2.5
- Buildable area = site width minus the setbacks (10’ due to the 5’ landscape buffer on each side) * site depth minus the setback (10’ due to the 5’ landscape buffer on each side)
- Number of floor = 5
- Site area = site width minus site depth
- Assumed calculation: $2.5 = (5*(x-10)^2)/x^2$
    - X=34.14ft
    - Minimum site area achieving 2.5 FAR = 1,165.6sf or .027 acres

CN	35ft (3)	Varies [1]	Lots < .31 acres, FAR < 2.5 Lots > .31 acres, FAR ≥ 2.5 [3]	Partially
CPX	None (infinite)	100%	FAR >2.5	Yes
CX	40ft (4) -200ft (20)	100%	4 ≤ FAR ≤ 20	Yes
GW	Residential not allowed	Not applicable	FAR = 0	No
HX	35ft (3) – 75ft (7)	100%	3 ≤ FAR ≤ 7	Yes
IL	Residential not allowed	Not applicable	FAR =0	No
MX	35ft (3) – 75ft (7)	100%	3 ≤ FAR ≤ 7	Yes
OCI	35ft (3) – 75ft (7)	100%	3 ≤ FAR ≤ 7	Yes
Park	Residential not allowed	Not applicable	FAR =0	No
R-4 - R-9	35ft (3)	50%	FAR = 1.5	No
R-18 - R-22	50ft (5)	50%	FAR = 2.5	Yes

[3] FAR = (Buildable Area * Number of Floors)/Site Area.

- FAR target = 2.5
- Buildable area = site width minus the setbacks (10' due to the 5' landscape buffer on each side) * site depth minus the setback (10' due to the 5' landscape buffer on each side)
- Number of floor = 3
- Site area = site width minus site depth
- Assumed calculation: $2.5 = (3*(x-10)^2)/x^2$
    - X=114.77ft
    - Minimum site area achieving 2.5 FAR = 13,172.2sf or .31 acres

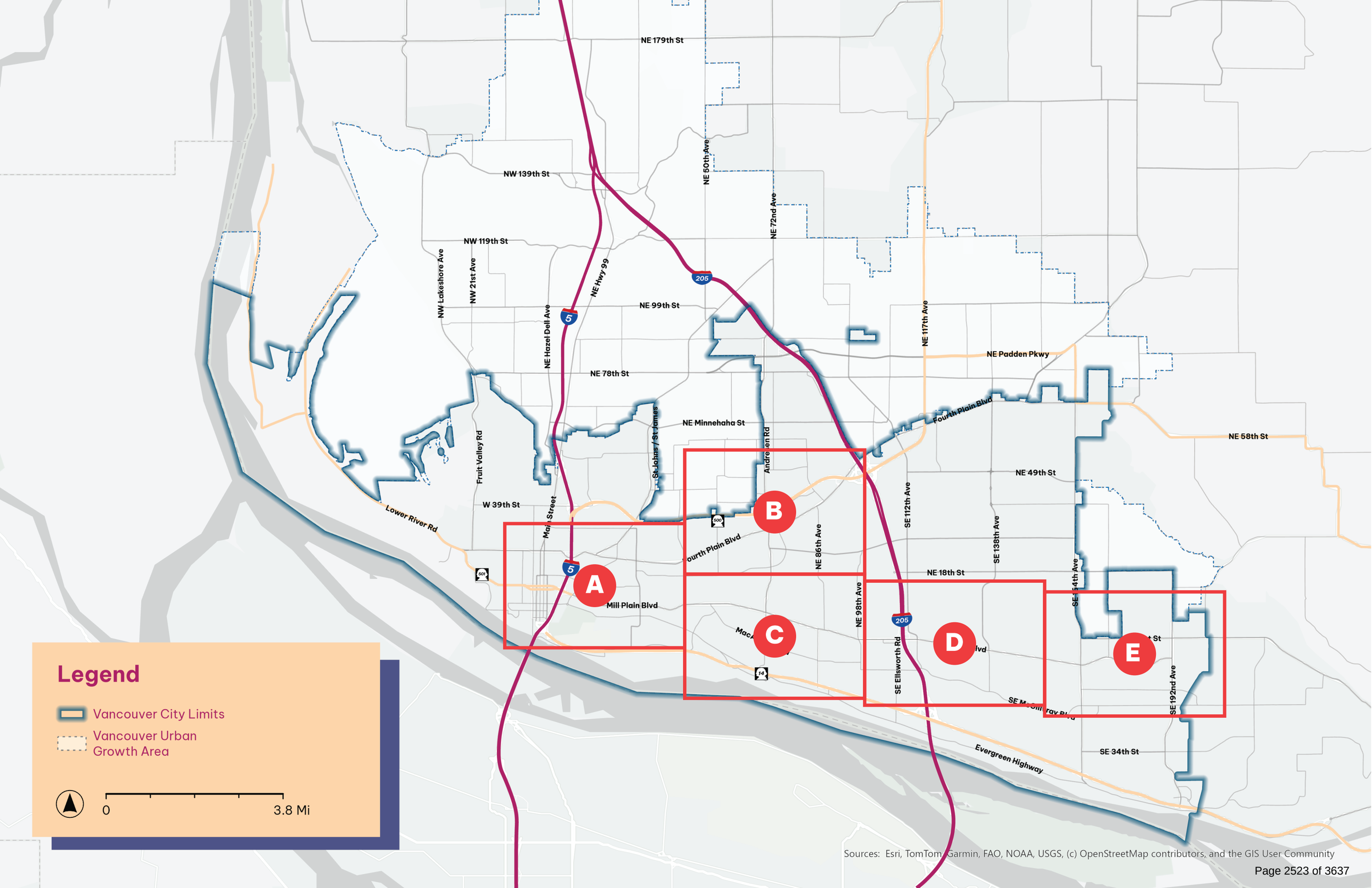
R-30	50ft (5)	55%	FAR = 2.75	Yes
R-35	60ft (6)	60%	FAR = 3.6	Yes

In addition to the zoning districts identified in the table above, since the proposed new Land Use and Development Code allows for an FAR in excess of 3.0, per RCW 36.70A.840(2)(a)(ii), the City has opted to exempt up to an additional 25% of properties that would otherwise not be exempt within station areas. The methodology for selecting exempt sites analyzed parcel proximity to transit, redevelopment potential, consolidated ownership, and future zoning to determine priority. Each parcel was weighted based on these criteria, followed by an optimization analysis to target a 25% exemption rate relative to non-exempt properties within each station area. A full summary of station areas can be found in Exhibit B, and a complete list of properties and their exemption status is provided in Exhibit C.

Conclusion

The City of Vancouver's proposed updated Comprehensive Plan and development code standards ensure that high-density transit-oriented housing is achievable and supported by the code. This memo represents required documentation for the Department of Commerce to certify these standards and list of exempted parcels as compliant with the HB 1491 mandate for station area density and affordability inclusion.

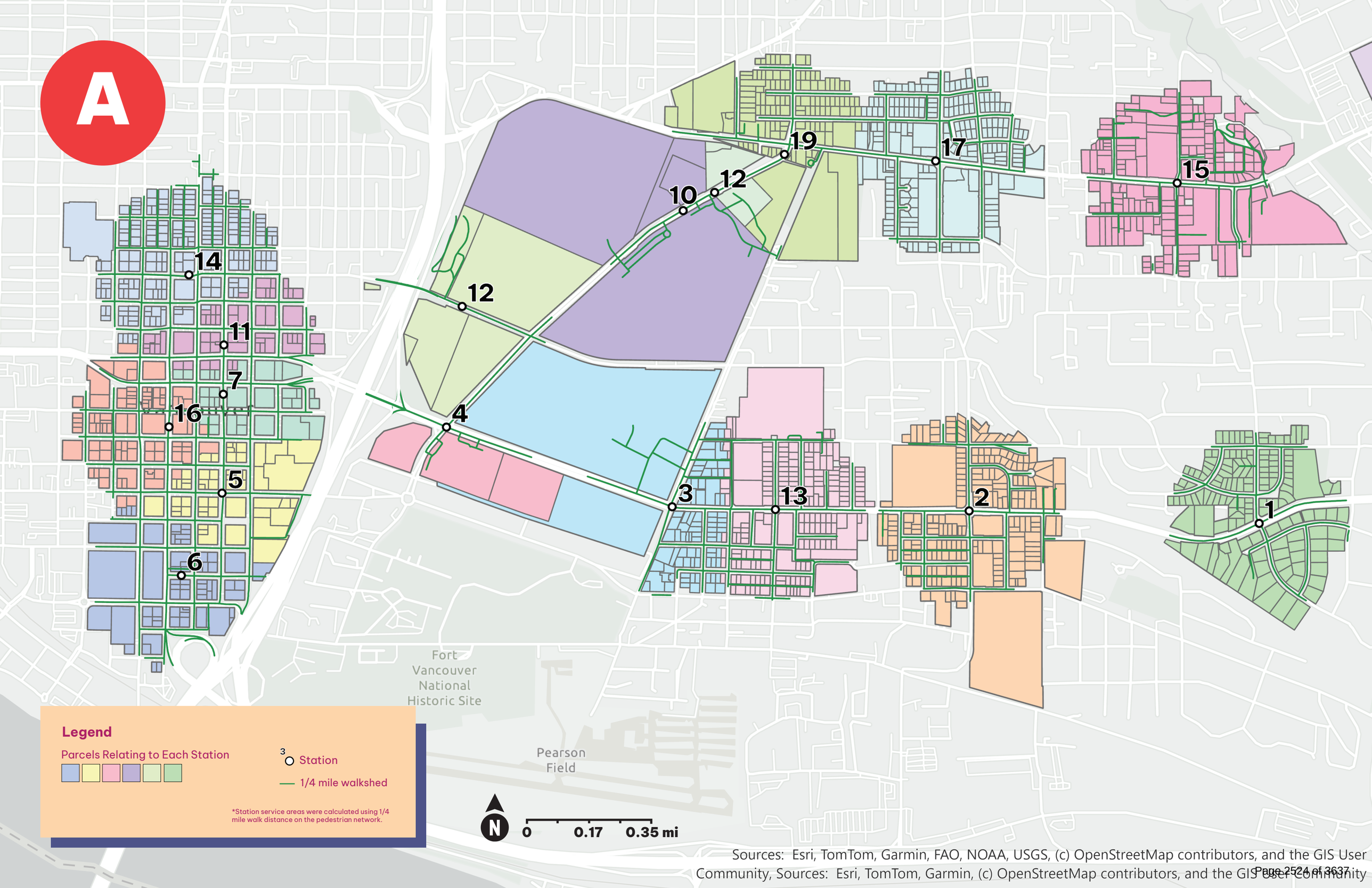
Exhibit A: Map of Station Area Parcels



Legend

- Vancouver City Limits
- Vancouver Urban Growth Area

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

A

Fort Vancouver National Historic Site

Pearson Field

Legend

- Exempt
- 25% Exemption under RCW 36.70A.840(2)(a)(ii)
- Not Exempt
- 3 Station
- 1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

B

State Highway 500

9

34

24

38

39

33

8

30

20

Legend

Parcels Relating to Each Station

3 Station

1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N 0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

B

State Highway 500

9

34

24

38

39

33

8

30

20

Legend

- Exempt
- 25% Exemption under RCW 36.70A.840(2)(a)(ii)
- Not Exempt
- 3 Station
- 1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N 0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

C

Bumt Bridge Creek

31

32

35

36

23

22

Legend

Parcels Relating to Each Station

3 Station

1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

C

Bumt Bridge Creek

31

32

35

36

23

22

Legend

- Exempt
- 25% Exemption under RCW 36.70A.840(2)(a)(ii)
- Not Exempt
- 3 Station
- 1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

D

27

41

25

28

21

Legend

Parcels Relating to Each Station

3 Station

1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

D

27

41

25

28

21

Legend

- Exempt
- 25% Exemption under RCW 36.70A.840(2)(a)(ii)
- Not Exempt
- 3 Station
- 1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.17 0.35 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

E

Countryside Woods

NE 164th Ave

NE 192nd Ave

SE 1st St

SE 1st St

SE 1st St

SE 1st St

SE 164th Ave

SE 192nd Ave

SE Mill Plain Blvd

SE Mill Plain Blvd

26

29

40

37

Legend

Parcels Relating to Each Station

3 Station

1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.14 0.28 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

E

Countryside
Woods

NE 164th Ave

NE 192nd Ave

SE 1st St

SE 1st St

SE 1st St

SE 1st St

SE 164th Ave

SE 192nd Ave

SE Mill Plain Blvd

SE Mill Plain Blvd

26

29

40

37

Legend

- Exempt
- 25% Exemption under RCW 36.70A.840(2)(a)(ii)
- Not Exempt
- 3 Station
- 1/4 mile walkshed

*Station service areas were calculated using 1/4 mile walk distance on the pedestrian network.

N

0 0.14 0.28 mi

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community

Exhibit B: Table Summary of Station Areas

Station ID	Total Property within Station Area (acres)	Area EXEMPT per RCW 36.70A.840(7)(b)(i) (acres)	Area NON-EXEMPT per RCW 36.70A.840(7)(b)(i) (acres)	AREA SELECTED EXEMPT PER RCW 36.70A.840(2)(a)(ii) (acres)	Percent of Non-exempt property exempted
1	53.07	13.71	39.36	9.74	24.7%
2	70.53	51.06	19.47	4.83	24.8%
3	84.47	74.59	9.87	2.41	24.4%
4	20.48	20.48	0.00	0.00	0.0%
5	21.91	21.91	0.00	0.00	0.0%
6	855.54	844.85	10.69	0.00	0.0%
7	58.52	58.52	0.00	0.00	0.0%
8	153.20	82.94	70.26	0.00	0.0%
9	209.71	209.71	0.00	0.00	0.0%
10	113.78	113.78	0.00	0.00	0.0%
11	13.03	13.03	0.00	0.00	0.0%
12	47.12	47.12	0.00	0.00	0.0%
13	52.71	18.12	34.59	8.65	25.0%
14	33.45	15.86	17.58	4.38	24.9%
15	720.81	703.86	16.95	4.14	24.4%
16	21.20	21.20	0.00	0.00	0.0%
17	43.18	29.04	14.14	3.49	24.7%
18	7.26	7.26	0.00	0.00	0.0%
19	47.54	39.80	7.74	1.86	24.1%
20	67.26	54.41	12.85	3.20	24.9%
21	62.14	56.25	5.89	1.44	24.4%
22	47.05	23.37	23.68	5.87	24.8%
23	49.07	34.13	14.93	3.71	24.8%
24	76.24	35.05	41.19	10.18	24.7%
25	70.29	68.34	1.95	0.42	21.6%
26	1902.58	1897.40	5.19	1.29	24.8%
27	166.18	157.40	8.77	2.11	24.0%
28	121.86	121.86	0.00	0.00	0.0%
29	106.65	39.99	66.66	13.14	19.7%
30	66.80	63.63	3.17	0.70	22.0%
31	113.27	20.88	92.40	6.12	6.6%
32	120.63	33.51	87.12	9.83	11.3%
33	51.94	30.54	21.41	5.08	23.7%
34	38.14	16.37	21.77	5.34	24.5%
35	54.14	35.08	19.06	4.57	24.0%
36	45.59	38.87	6.71	1.66	24.8%
37	104.33	78.80	25.53	5.00	19.6%
38	95.26	88.38	6.88	1.68	24.5%
39	68.91	68.17	0.74	0.18	24.6%
40	83.85	81.85	2.00	0.36	18.2%
41	78.87	78.87	0.00	0.00	0.0%

Exhibit C: Table of Individual Property Exemptions Status

Station ID	Property ID	Area (acres)	Zoning Designatoin Prior to January 1, 2025	Updated Comprehensive Plan Zoning Designation	Final Exemption Status	EXEMPT per RCW 36.70A.840(7)(b)(i)	SELECTED EXEMPT PER RCW 36.70A.840(2)(a)(ii)
1	37911180	0.34	R-6	MSN	YES	NO	YES
1	37303220	0.10	R-9	MSN	YES	NO	YES
1	37911001	0.35	R-6	MSN	YES	NO	YES
1	37911002	0.32	R-6	MSN	YES	NO	YES
1	37303570	0.23	R-9	MSN	YES	NO	YES
1	37303210	0.18	R-9	MSN	YES	NO	YES
1	37303560	0.16	R-9	MSN	YES	NO	YES
1	37303550	0.12	R-9	MSN	YES	NO	YES
1	37303542	0.16	R-9	MSN	YES	NO	YES
1	37911181	0.31	R-6	MSN	YES	NO	YES
1	37303530	0.15	R-9	MSN	YES	NO	YES
1	37910129	0.94	R-6	MSN	YES	NO	YES
1	37245000	0.31	R-9	MSN	YES	NO	YES
1	37911182	0.27	R-6	MSN	YES	NO	YES
1	37302330	0.22	R-9	MSN	YES	NO	YES
1	37910112	0.23	R-6	MSN	YES	NO	YES
1	37302320	0.16	R-9	MSN	YES	NO	YES
1	37910130	0.74	R-6	MSN	YES	NO	YES
1	37302310	0.12	R-9	MSN	YES	NO	YES
1	37911183	0.32	R-6	MSN	YES	NO	YES
1	37726000	0.50	R-6	MSN	YES	NO	YES
1	37302300	0.13	R-9	MSN	YES	NO	YES
1	37728000	0.61	R-6	MSN	YES	NO	YES
1	37302290	0.11	R-9	MSN	YES	NO	YES
1	37727000	0.86	R-6	MSN	YES	NO	YES
1	37302280	0.11	R-9	MSN	YES	NO	YES
1	37302270	0.13	R-9	MSN	YES	NO	YES
1	37911184	0.32	R-6	MSN	YES	NO	YES
1	37100000	0.13	R-9	MSN	YES	NO	YES
1	37231000	0.24	R-9	MSN	YES	NO	YES
1	36359022	0.32	R-6	MSN	YES	NO	YES
1	37911185	0.32	R-6	MSN	YES	NO	YES
1	37095000	0.25	R-9	MSN	YES	NO	YES
1	37090000	0.23	R-9	MSN	NO	NO	NO
1	36359024	0.25	R-6	MSN	NO	NO	NO
1	37911186	0.40	R-6	MSN	NO	NO	NO
1	37775150	0.26	R-6	MSN	NO	NO	NO
1	37910113	1.05	R-6	LSN	NO	NO	NO
1	37910137	1.06	R-6	LSN	NO	NO	NO
1	37302250	0.13	R-9	LSN	NO	NO	NO
1	37302260	0.13	R-9	LSN	NO	NO	NO
1	37302360	0.11	R-9	LSN	NO	NO	NO
1	37302390	0.12	R-9	LSN	NO	NO	NO
1	37302400	0.17	R-9	LSN	NO	NO	NO
1	37303240	0.11	R-9	LSN	NO	NO	NO
1	37303230	0.12	R-9	LSN	NO	NO	NO
1	37302500	0.13	R-9	LSN	NO	NO	NO
1	37302490	0.12	R-9	LSN	NO	NO	NO
1	37302480	0.11	R-9	LSN	NO	NO	NO
1	37302640	0.13	R-9	LSN	NO	NO	NO
1	37302700	0.10	R-9	LSN	NO	NO	NO
1	37302350	0.14	R-9	LSN	NO	NO	NO
1	37105000	0.18	R-9	LSN	NO	NO	NO

1	37302370	0.17 R-9	LSN	NO	NO	NO
1	37303290	0.20 R-9	LSN	NO	NO	NO
1	37301780	0.13 R-9	LSN	NO	NO	NO
1	37302080	0.16 R-9	LSN	NO	NO	NO
1	37302380	0.12 R-9	LSN	NO	NO	NO
1	37302090	0.15 R-9	LSN	NO	NO	NO
1	37302060	0.20 R-9	LSN	NO	NO	NO
1	37302474	0.12 R-9	LSN	NO	NO	NO
1	37302475	0.20 R-9	LSN	NO	NO	NO
1	37302720	0.13 R-9	LSN	NO	NO	NO
1	37110000	0.15 R-9	LSN	NO	NO	NO
1	37302450	0.12 R-9	LSN	NO	NO	NO
1	37302440	0.14 R-9	LSN	NO	NO	NO
1	37303350	0.13 R-9	LSN	NO	NO	NO
1	37302472	0.12 R-9	LSN	NO	NO	NO
1	37302473	0.14 R-9	LSN	NO	NO	NO
1	37302070	0.17 R-9	LSN	NO	NO	NO
1	37302620	0.14 R-9	LSN	NO	NO	NO
1	37302710	0.10 R-9	LSN	NO	NO	NO
1	37302890	0.14 R-9	LSN	NO	NO	NO
1	37302460	0.13 R-9	LSN	NO	NO	NO
1	37301790	0.12 R-9	LSN	NO	NO	NO
1	37302610	0.19 R-9	LSN	NO	NO	NO
1	37302477	0.09 R-9	LSN	NO	NO	NO
1	37302470	0.12 R-9	LSN	NO	NO	NO
1	37302050	0.21 R-9	LSN	NO	NO	NO
1	37302476	0.19 R-9	LSN	NO	NO	NO
1	37302471	0.13 R-9	LSN	NO	NO	NO
1	36359002	3.00 Park	POS	NO	NO	NO
1	37302520	0.17 R-9	LSN	NO	NO	NO
1	37302430	0.12 R-9	LSN	NO	NO	NO
1	37302600	0.23 R-9	LSN	NO	NO	NO
1	37911005	0.79 R-6	LSN	NO	NO	NO
1	37911007	1.00 R-6	LSN	NO	NO	NO
1	37302420	0.17 R-9	LSN	NO	NO	NO
1	37303251	0.18 R-9	LSN	NO	NO	NO
1	37911208	0.55 R-6	LSN	NO	NO	NO
1	37911195	0.41 R-6	LSN	NO	NO	NO
1	37302510	0.12 R-9	LSN	NO	NO	NO
1	37302530	0.17 R-9	LSN	NO	NO	NO
1	37303260	0.11 R-9	LSN	NO	NO	NO
1	37911196	0.57 R-6	LSN	NO	NO	NO
1	37911003	0.42 R-6	LSN	NO	NO	NO
1	37911190	0.34 R-6	LSN	NO	NO	NO
1	37911201	0.50 R-6	LSN	NO	NO	NO
1	37911189	0.39 R-6	LSN	NO	NO	NO
1	37911199	0.54 R-6	LSN	NO	NO	NO
1	37911191	0.44 R-6	LSN	NO	NO	NO

1	37911200	0.51	R-6	LSN	NO	NO	NO
1	37911008	0.98	R-6	LSN	NO	NO	NO
1	37302580	0.14	R-9	LSN	NO	NO	NO
1	37302590	0.17	R-9	LSN	NO	NO	NO
1	37302410	0.14	R-9	LSN	NO	NO	NO
1	37303256	0.16	R-9	LSN	NO	NO	NO
1	37911197	0.50	R-6	LSN	NO	NO	NO
1	37911207	0.47	R-6	LSN	NO	NO	NO
1	37911004	0.49	R-6	LSN	NO	NO	NO
1	37911192	0.41	R-6	LSN	NO	NO	NO
1	37911006	1.17	R-6	LSN	NO	NO	NO
1	37302630	0.12	R-9	LSN	NO	NO	NO
1	37302540	0.20	R-9	LSN	NO	NO	NO
1	37302570	0.13	R-9	LSN	NO	NO	NO
1	37303330	0.13	R-9	LSN	NO	NO	NO
1	37303340	0.13	R-9	LSN	NO	NO	NO
1	37303261	0.16	R-9	LSN	NO	NO	NO
1	37302750	0.14	R-9	LSN	NO	NO	NO
1	37302550	0.12	R-9	LSN	NO	NO	NO
1	37302560	0.13	R-9	LSN	NO	NO	NO
1	37303200	0.11	R-9	LSN	NO	NO	NO
1	37303270	0.16	R-9	LSN	NO	NO	NO
1	37302740	0.15	R-9	LSN	NO	NO	NO
1	37302730	0.12	R-9	LSN	NO	NO	NO
1	37303300	0.22	R-9	LSN	NO	NO	NO
1	37303280	0.19	R-9	LSN	NO	NO	NO
1	37302760	0.19	R-9	LSN	NO	NO	NO
1	37302880	0.13	R-9	LSN	NO	NO	NO
1	37303310	0.17	R-9	LSN	NO	NO	NO
1	37303320	0.17	R-9	LSN	NO	NO	NO
1	37540004	1.43	R-18	MSN	YES	YES	NO
1	37540016	1.43	R-18	MSN	YES	YES	NO
1	37540010	1.43	R-18	MSN	YES	YES	NO
1	37540008	1.43	R-18	MSN	YES	YES	NO
1	37540006	1.43	R-18	MSN	YES	YES	NO
1	37540014	1.43	R-18	MSN	YES	YES	NO
1	37540012	1.43	R-18	MSN	YES	YES	NO
1	37303253	0.08	R-18	MSN	YES	YES	NO
1	37303255	0.15	R-18	MSN	YES	YES	NO
1	37737000	1.00	R-18	MSN	YES	YES	NO
1	37303254	0.18	R-18	MSN	YES	YES	NO
1	37742000	0.43	R-18	MSN	YES	YES	NO
1	37540002	1.43	R-18	MSN	YES	YES	NO
1	37303250	0.22	R-18	MSN	YES	YES	NO
1	37303252	0.16	R-18	MSN	YES	YES	NO
2	37303940	0.13	R-9	MU	YES	NO	YES
2	30965000	0.14	R-9	MU	YES	NO	YES
2	30979000	0.02	R-9	MU	YES	NO	YES
2	30963000	0.12	R-9	MU	YES	NO	YES
2	34110000	0.11	R-9	MU	YES	NO	YES
2	36255480	0.15	R-9	MU	YES	NO	YES
2	37303930	0.12	R-9	MU	YES	NO	YES
2	37303920	0.14	R-9	MU	YES	NO	YES
2	30962000	0.12	R-9	MU	YES	NO	YES

2	34100000	0.11 R-9	MU	YES	NO	YES
2	37303910	0.12 R-9	MU	YES	NO	YES
2	30880000	0.15 R-9	MU	YES	NO	YES
2	37303900	0.14 R-9	MU	YES	NO	YES
2	34050000	0.16 R-9	MU	YES	NO	YES
2	34120000	0.11 R-9	MU	YES	NO	YES
2	30956000	0.12 R-9	MU	YES	NO	YES
2	34030000	0.16 R-9	MU	YES	NO	YES
2	37303890	0.12 R-9	MU	YES	NO	YES
2	34231000	0.11 R-9	MU	YES	NO	YES
2	34125000	0.11 R-9	MU	YES	NO	YES
2	34230002	0.14 R-9	MU	YES	NO	YES
2	34230000	0.16 R-9	MU	YES	NO	YES
2	33970000	0.11 R-9	MU	YES	NO	YES
2	37303880	0.12 R-9	MU	YES	NO	YES
2	34232000	0.11 R-9	MU	YES	NO	YES
2	37303870	0.12 R-9	MU	YES	NO	YES
2	37303860	0.13 R-9	MU	YES	NO	YES
2	33980000	0.11 R-9	MU	YES	NO	YES
2	34225000	0.21 R-9	MU	YES	NO	YES
2	37301130	0.13 R-9	MU	YES	NO	YES
2	34220000	0.11 R-9	MU	YES	NO	YES
2	34210000	0.11 R-9	MU	YES	NO	YES
2	37301120	0.12 R-9	MU	YES	NO	YES
2	30874000	0.21 R-9	MU	YES	NO	YES
2	37301110	0.12 R-9	MU	YES	NO	YES
2	34130000	0.11 R-9	MSN	YES	NO	YES
2	34201000	0.11 R-9	MU	YES	NO	YES
2	34130000	0.11 R-9	MSN	YES	NO	YES
2	34201000	0.11 R-9	MU	YES	NO	YES
2	34200000	0.11 R-9	MU	YES	NO	YES
2	37301100	0.13 R-9	MU	NO	NO	NO
2	34140000	0.22 R-9	MSN	NO	NO	NO
2	34020000	0.11 R-9	MSN	NO	NO	NO
2	34015000	0.11 R-9	MSN	NO	NO	NO
2	33990000	0.22 R-9	MSN	NO	NO	NO
2	34010000	0.11 R-9	MSN	NO	NO	NO
2	37005210	0.20 R-9	MSN	NO	NO	NO
2	34000000	0.11 R-9	MSN	NO	NO	NO
2	34180000	0.11 R-9	MSN	NO	NO	NO
2	34181000	0.11 R-9	MSN	NO	NO	NO
2	34005000	0.11 R-9	MSN	NO	NO	NO
2	34175000	0.11 R-9	MSN	NO	NO	NO
2	37005201	0.14 R-9	MSN	NO	NO	NO
2	37005010	0.17 R-9	MSN	NO	NO	NO
2	37005200	0.15 R-9	MSN	NO	NO	NO
2	34170000	0.11 R-9	MSN	NO	NO	NO
2	37005020	0.17 R-9	MSN	NO	NO	NO
2	34190000	0.17 R-9	MSN	NO	NO	NO
2	35261000	0.32 R-9	MSN	NO	NO	NO
2	33880000	0.22 R-9	MSN	NO	NO	NO
2	37005190	0.12 R-9	MSN	NO	NO	NO
2	34160000	0.07 R-9	MSN	NO	NO	NO
2	37005030	0.17 R-9	MSN	NO	NO	NO
2	34150000	0.10 R-9	MSN	NO	NO	NO
2	35257000	0.25 R-9	MSN	NO	NO	NO

2	33890000	0.11	R-9	MSN	NO	NO	NO
2	35252000	0.26	R-9	MSN	NO	NO	NO
2	33891000	0.06	R-9	MSN	NO	NO	NO
2	35306000	0.17	R-9	MSN	NO	NO	NO
2	37180000	0.85	R-9	LSN	NO	NO	NO
2	35180000	9.39	Park	POS	NO	NO	NO
2	37508000	0.27	R-18	MSN	YES	NO	NO
2	37200000	0.10	R-18	MSN	YES	YES	NO
2	37500000	0.12	R-18	MSN	YES	YES	NO
2	37495000	0.15	R-18	MSN	YES	YES	NO
2	37240000	0.12	R-18	MSN	YES	YES	NO
2	37490000	0.13	R-18	MSN	YES	YES	NO
2	37504000	0.14	R-18	MSN	YES	YES	NO
2	37301480	0.20	R-18	MU	YES	YES	NO
2	37210000	0.12	R-18	MU	YES	YES	NO
2	37303690	0.12	R-18	MU	YES	YES	NO
2	37303710	0.10	R-18	MU	YES	YES	NO
2	37195000	0.56	R-18	MSN	YES	YES	NO
2	37301510	0.13	R-18	MSN	YES	YES	NO
2	37205000	0.14	R-18	MU	YES	YES	NO
2	37304020	0.15	R-18	MU	YES	YES	NO
2	37301521	0.13	R-18	MSN	YES	YES	NO
2	37304060	0.15	R-18	MU	YES	YES	NO
2	37303960	0.20	R-18	MU	YES	YES	NO
2	37197000	0.37	R-18	MSN	YES	YES	NO
2	37303680	0.12	R-18	MU	YES	YES	NO
2	37303660	0.10	R-18	MU	YES	YES	NO
2	37220000	0.27	CC	MU	YES	YES	NO
2	37301500	0.23	R-18	MU	YES	YES	NO
2	37304030	0.15	R-18	MU	YES	YES	NO
2	37304040	0.27	R-18	MU	YES	YES	NO
2	37304050	0.34	R-18	MU	YES	YES	NO
2	37303700	0.10	R-18	MU	YES	YES	NO
2	37303670	0.12	R-18	MU	YES	YES	NO
2	37303650	0.12	R-18	MU	YES	YES	NO
2	37247000	0.19	R-18	MU	YES	YES	NO
2	37190000	0.61	R-18	MSN	YES	YES	NO
2	31023000	0.12	R-18	MSN	YES	YES	NO
2	30914000	0.19	R-18	MSN	YES	YES	NO
2	30883000	0.56	R-18	MSN	YES	YES	NO
2	30915000	0.37	R-18	MSN	YES	YES	NO
2	30882005	0.19	R-18	MSN	YES	YES	NO
2	30884000	0.37	R-18	MSN	YES	YES	NO
2	30888000	0.34	R-18	MSN	YES	YES	NO
2	34235020	0.20	R-18	MSN	YES	YES	NO
2	34235030	0.14	CC	MU	YES	YES	NO
2	34235040	0.14	CC	MU	YES	YES	NO
2	30865005	0.11	R-18	MSN	YES	YES	NO
2	34235050	0.13	R-18	MSN	YES	YES	NO
2	30882000	0.19	R-18	MSN	YES	YES	NO
2	30889000	0.37	R-18	MSN	YES	YES	NO
2	30967000	0.13	R-30	MU	YES	YES	NO
2	30968000	0.12	R-30	MU	YES	YES	NO
2	30877000	1.62	CC	MU	YES	YES	NO

2	33905000	0.11 CC	MU	YES	YES	NO
2	33860000	0.13 CC	MU	YES	YES	NO
2	33920000	0.22 CC	MU	YES	YES	NO
2	31058000	0.09 CC	MU	YES	YES	NO
2	31022000	0.08 CC	MU	YES	YES	NO
2	30899000	0.30 R-30	MU	YES	YES	NO
2	30949000	0.12 R-30	MU	YES	YES	NO
2	30900000	0.07 CC	MU	YES	YES	NO
2	30953000	0.15 CC	MU	YES	YES	NO
2	30910000	0.32 R-30	MU	YES	YES	NO
2	33870000	0.20 CC	MU	YES	YES	NO
2	33940000	0.11 CC	MU	YES	YES	NO
2	33950000	0.14 CC	MU	YES	YES	NO
2	30954000	0.13 CC	MU	YES	YES	NO
2	30958000	0.16 R-30	MU	YES	YES	NO
2	33900000	0.11 CC	MU	YES	YES	NO
2	34070000	0.11 CC	MU	YES	YES	NO
2	33910000	0.11 CC	MU	YES	YES	NO
2	33930000	0.11 CC	MU	YES	YES	NO
2	30945000	0.14 CC	MU	YES	YES	NO
2	30897000	0.26 CC	MU	YES	YES	NO
2	30994000	0.16 R-18	MU	YES	YES	NO
2	30881000	1.24 R-22	MU	YES	YES	NO
2	30879000	0.11 CC	MU	YES	YES	NO
2	30944000	0.11 R-18	MU	YES	YES	NO
2	30922000	0.12 R-18	MSN	YES	YES	NO
2	30940000	0.12 R-18	MU	YES	YES	NO
2	31043000	0.39 R-18	MU	YES	YES	NO
2	30940000	0.12 R-18	MU	YES	YES	NO
2	31043000	0.39 R-18	MU	YES	YES	NO
2	30942000	0.12 R-18	MU	YES	YES	NO
2	30860000	0.20 R-18	MU	YES	YES	NO
2	31060000	0.13 R-18	MSN	YES	YES	NO
2	30978000	0.23 R-18	MSN	YES	YES	NO
2	30943000	0.11 R-18	MSN	YES	YES	NO
2	37301470	0.14 R-18	MU	YES	YES	NO
2	37239000	0.22 R-18	MU	YES	YES	NO
2	37301490	0.18 R-18	MU	YES	YES	NO
2	37304010	0.19 R-18	MU	YES	YES	NO
2	37303850	0.11 R-18	MSN	YES	YES	NO
2	37303840	0.13 R-18	MSN	YES	YES	NO
2	37303760	0.12 R-18	MSN	YES	YES	NO
2	37303585	0.28 R-18	MSN	YES	YES	NO
2	37570000	0.27 R-18	MSN	YES	YES	NO
2	34235010	0.20 R-18	MSN	YES	YES	NO
2	30865000	0.14 R-18	MSN	YES	YES	NO
2	37590000	0.49 R-18	MSN	YES	YES	NO
2	31005000	0.19 R-18	MSN	YES	YES	NO
2	30977000	0.19 R-18	MSN	YES	YES	NO
2	31016000	0.13 R-30	MU	YES	YES	NO
2	37303990	0.14 R-18	MU	YES	YES	NO
2	30975000	0.09 CC	MU	YES	YES	NO
2	37560000	4.87 R-18	MSN	YES	YES	NO
2	30948000	0.51 CC	MU	YES	YES	NO
2	30941000	0.15 R-18	MU	YES	YES	NO
2	31042000	0.19 R-18	MU	YES	YES	NO

2	31017000	0.15	CC	MU	YES	YES	NO
2	30916000	0.28	R-18	MSN	YES	YES	NO
2	30991000	0.12	CC	MU	YES	YES	NO
2	986049823	0.05	CC	MU	YES	YES	NO
2	30907000	0.23	CC	MU	YES	YES	NO
2	37304070	0.13	CC	MU	YES	YES	NO
2	37304080	0.17	CC	MU	YES	YES	NO
2	37303600	0.10	R-18	MSN	YES	YES	NO
2	37303590	0.10	R-18	MSN	YES	YES	NO
2	37303730	0.13	R-18	MSN	YES	YES	NO
2	37303770	0.10	R-18	MSN	YES	YES	NO
2	37303970	0.20	R-18	MU	YES	YES	NO
2	30947000	1.43	CC	MU	YES	YES	NO
2	33960000	0.25	CC	MU	YES	YES	NO
2	37303630	0.14	R-18	MSN	YES	YES	NO
2	37303610	0.10	R-18	MSN	YES	YES	NO
2	37303720	0.12	R-18	MSN	YES	YES	NO
2	37303780	0.09	R-18	MSN	YES	YES	NO
2	30856000	17.72	R-30	IC	YES	YES	NO
2	37303620	0.10	R-18	MSN	YES	YES	NO
2	37303740	0.12	R-18	MSN	YES	YES	NO
2	37303790	0.31	R-18	MSN	YES	YES	NO
2	37303750	0.11	R-18	MSN	YES	YES	NO
2	37303980	0.20	R-18	MU	YES	YES	NO
2	37303830	0.12	R-18	MSN	YES	YES	NO
2	37303820	0.12	R-18	MSN	YES	YES	NO
2	37303950	0.26	CC	MU	YES	YES	NO
2	34080000	0.12	CC	MU	YES	YES	NO
2	37301450	0.22	R-18	MU	YES	YES	NO
2	37301530	0.26	R-18	MSN	YES	YES	NO
2	37303640	0.16	R-18	MU	YES	YES	NO
2	37303800	0.45	R-18	MSN	YES	YES	NO
2	37303810	0.36	R-18	MSN	YES	YES	NO
2	34090000	0.12	CC	MU	YES	YES	NO
3	31021000	0.31	R-9	MU	YES	NO	YES
3	31056000	0.30	R-9	MU	YES	NO	YES
3	32390000	0.17	R-9	MU	YES	NO	YES
3	31025000	0.15	R-9	MU	YES	NO	YES
3	32380000	0.07	R-9	MU	YES	NO	YES
3	30894000	0.23	R-9	MU	YES	NO	YES
3	32385000	0.06	R-9	MU	YES	NO	YES
3	32440000	0.01	R-9	MU	YES	NO	YES
3	30855000	0.31	R-9	MU	YES	NO	YES
3	30898000	0.22	R-9	MU	YES	NO	YES
3	30854005	0.11	R-9	MU	YES	NO	YES
3	32450000	0.19	R-9	MSN	YES	NO	YES
3	32430000	0.19	R-9	MSN	YES	NO	YES
3	32411000	0.09	R-9	MSN	YES	NO	YES
3	32410000	0.14	R-9	MSN	NO	NO	NO
3	32160000	0.23	R-9	MU	NO	NO	NO
3	30893000	0.16	R-9	MU	NO	NO	NO
3	31015000	0.17	R-9	MU	NO	NO	NO
3	30891000	0.16	R-9	MU	NO	NO	NO
3	31009000	0.12	R-9	MU	NO	NO	NO

3	32395000	0.13 R-9	MU	NO	NO	NO
3	32400000	0.19 R-9	MU	NO	NO	NO
3	32365000	0.11 R-9	MU	NO	NO	NO
3	30851000	0.57 R-9	MU	NO	NO	NO
3	30840000	0.24 R-9	MU	NO	NO	NO
3	32360000	0.12 R-9	MU	NO	NO	NO
3	32330000	0.13 R-9	MU	NO	NO	NO
3	32335000	0.12 R-9	MU	NO	NO	NO
3	32320000	0.11 R-9	MU	NO	NO	NO
3	32290000	0.12 R-9	MU	NO	NO	NO
3	32285000	0.11 R-9	MU	NO	NO	NO
3	32280000	0.11 R-9	MU	NO	NO	NO
3	30854000	0.70 R-9	MU	NO	NO	NO
3	32340000	0.14 R-9	MU	NO	NO	NO
3	32350000	0.11 R-9	MU	NO	NO	NO
3	32310000	0.11 R-9	MU	NO	NO	NO
3	30854010	0.17 R-9	MU	NO	NO	NO
3	32490000	0.11 R-9	MU	NO	NO	NO
3	32300000	0.11 R-9	MU	NO	NO	NO
3	32275000	0.11 R-9	MU	NO	NO	NO
3	32500000	0.11 R-9	MU	NO	NO	NO
3	32495000	0.11 R-9	MU	NO	NO	NO
3	32510000	0.12 R-9	MU	NO	NO	NO
3	32710000	0.23 R-9	MU	NO	NO	NO
3	32480000	0.11 R-9	MU	NO	NO	NO
3	32460000	0.20 R-9	MSN	NO	NO	NO
3	32470000	0.23 R-9	MU	NO	NO	NO
3	32740000	0.17 R-9	MU	NO	NO	NO
3	32180000	0.12 R-9	MU	NO	NO	NO
3	32420000	0.17 R-9	MSN	NO	NO	NO
3	32465000	0.11 R-9	MSN	NO	NO	NO
3	32185000	0.12 R-9	MU	NO	NO	NO
3	32170000	0.23 R-9	MU	NO	NO	NO
3	32190000	0.12 R-9	MU	NO	NO	NO
3	32255000	0.12 R-9	MSN	NO	NO	NO
3	32250000	0.11 R-9	MSN	NO	NO	NO
3	32240000	0.12 R-9	MSN	NO	NO	NO
3	32260000	0.12 R-9	MSN	NO	NO	NO
3	32235000	0.12 R-9	MSN	NO	NO	NO
3	32230000	0.11 R-9	MSN	NO	NO	NO
3	35299000	0.18 R-30	MSN	YES	YES	NO
3	35421000	0.14 R-30	MU	YES	YES	NO
3	35343000	0.26 R-30	MSN	YES	YES	NO
3	35197000	0.24 R-30	MSN	YES	YES	NO
3	35196000	0.18 R-30	MSN	YES	YES	NO
3	35188000	0.33 R-30	MU	YES	YES	NO
3	35203000	0.12 R-30	MSN	YES	YES	NO
3	35239000	0.25 R-30	MSN	YES	YES	NO
3	35336000	0.14 R-30	MSN	YES	YES	NO
3	35324000	0.15 R-30	MSN	YES	YES	NO
3	35240000	0.13 R-30	MSN	YES	YES	NO
3	35191000	0.35 R-30	MU	YES	YES	NO
3	35305000	0.14 R-30	MU	YES	YES	NO
3	35190000	0.80 R-30	MU	YES	YES	NO

3	35198000	0.15	R-30	MSN	YES	YES	NO
3	35348000	0.23	R-30	MSN	YES	YES	NO
3	35335000	0.16	R-30	MSN	YES	YES	NO
3	35192000	0.19	R-30	MSN	YES	YES	NO
3	35193000	0.19	R-30	MU	YES	YES	NO
3	35272000	0.17	R-30	MSN	YES	YES	NO
3	38279910	68.99	CPX	RAC	YES	YES	NO
3	35186000	0.26	R-30	MSN	YES	YES	NO
3	35185000	0.06	R-30	MSN	YES	YES	NO
3	35250000	0.36	R-30	MSN	YES	YES	NO
3	35242000	0.41	R-30	MSN	YES	YES	NO
4	38279938	7.60	CPX	POS	YES	YES	NO
4	38279926	8.33	CPX	RAC	YES	YES	NO
4	38279918	4.55	CPX	RAC	YES	YES	NO
5	39385000	0.07	CX	RAC	YES	YES	NO
5	39073000	0.12	CX	RAC	YES	YES	NO
5	39000000	0.95	CX	RAC	YES	YES	NO
5	39360000	0.24	CX	RAC	YES	YES	NO
5	39310000	0.07	CX	RAC	YES	YES	NO
5	39110000	0.23	CX	RAC	YES	YES	NO
5	39380000	0.07	CX	RAC	YES	YES	NO
5	39400000	0.07	CX	RAC	YES	YES	NO
5	39230000	0.08	CX	RAC	YES	YES	NO
5	39290000	0.21	CX	RAC	YES	YES	NO
5	39060000	0.11	CX	RAC	YES	YES	NO
5	51620000	0.23	CX	RAC	YES	YES	NO
5	39214000	0.16	CX	RAC	YES	YES	NO
5	39120000	0.12	CX	RAC	YES	YES	NO
5	39390000	0.09	CX	RAC	YES	YES	NO
5	39315000	0.15	CX	RAC	YES	YES	NO
5	51815000	0.14	CX	RAC	YES	YES	NO
5	51810000	0.09	CX	RAC	YES	YES	NO
5	39212000	0.23	CX	RAC	YES	YES	NO
5	39040000	0.70	CX	RAC	YES	YES	NO
5	39410000	0.23	CX	RAC	YES	YES	NO
5	51800000	0.11	CX	RAC	YES	YES	NO
5	39300000	0.25	CX	RAC	YES	YES	NO
5	39286000	0.24	CX	RAC	YES	YES	NO
5	39330000	0.15	CX	RAC	YES	YES	NO
5	39332000	0.25	CX	RAC	YES	YES	NO
5	39420000	0.24	CX	RAC	YES	YES	NO
5	39280000	0.12	CX	RAC	YES	YES	NO
5	39283000	0.23	CX	RAC	YES	YES	NO
5	39270000	0.12	CX	RAC	YES	YES	NO
5	51640000	0.11	CX	RAC	YES	YES	NO
5	51770000	0.23	CX	RAC	YES	YES	NO
5	39100000	0.23	CX	RAC	YES	YES	NO
5	38823000	0.65	CX	RAC	YES	YES	NO
5	39320000	0.23	CX	RAC	YES	YES	NO
5	39240000	0.15	CX	RAC	YES	YES	NO
5	38826000	0.92	CX	RAC	YES	YES	NO
5	39150000	0.94	CX	RAC	YES	YES	NO
5	39130000	0.12	CX	RAC	YES	YES	NO
5	39140000	0.23	CX	RAC	YES	YES	NO

5	51790000	0.11	CX	RAC	YES	YES	NO
5	39198000	0.39	CX	RAC	YES	YES	NO
5	38840000	1.61	CX	RAC	YES	YES	NO
5	38828000	1.46	CX	RAC	YES	YES	NO
5	51680000	0.92	CX	RAC	YES	YES	NO
5	51650000	0.12	CX	RAC	YES	YES	NO
5	51630000	0.23	CX	RAC	YES	YES	NO
5	51660000	0.23	CX	RAC	YES	YES	NO
5	986035622	0.63	CX	RAC	YES	YES	NO
5	39220000	3.12	CX	RAC	YES	YES	NO
5	39224000	0.69	CX	RAC	YES	YES	NO
5	986035621	0.89	CX	RAC	YES	YES	NO
5	39220001	1.62	CX	RAC	YES	YES	NO
6	986051700	5.34	Park	POS	NO	NO	NO
6	48615000	5.34	Park	POS	NO	NO	NO
6	38740001	0.95	CX	RAC	YES	YES	NO
6	48170176	2.21	CX	RAC	YES	YES	NO
6	48170222	2.21	CX	RAC	YES	YES	NO
6	48170362	2.21	CX	RAC	YES	YES	NO
6	48170368	2.21	CX	RAC	YES	YES	NO
6	48170316	2.21	CX	RAC	YES	YES	NO
6	48170408	2.21	CX	RAC	YES	YES	NO
6	48170226	2.21	CX	RAC	YES	YES	NO
6	48170034	2.21	CX	RAC	YES	YES	NO
6	48170014	2.21	CX	RAC	YES	YES	NO
6	48170266	2.21	CX	RAC	YES	YES	NO
6	48170054	2.21	CX	RAC	YES	YES	NO
6	48170160	2.21	CX	RAC	YES	YES	NO
6	48170372	2.21	CX	RAC	YES	YES	NO
6	48170246	2.21	CX	RAC	YES	YES	NO
6	48170418	2.21	CX	RAC	YES	YES	NO
6	48170026	2.21	CX	RAC	YES	YES	NO
6	48170366	2.21	CX	RAC	YES	YES	NO
6	48170060	2.21	CX	RAC	YES	YES	NO
6	48170080	2.21	CX	RAC	YES	YES	NO
6	48170040	2.21	CX	RAC	YES	YES	NO
6	48170441	2.21	CX	RAC	YES	YES	NO
6	48170146	2.21	CX	RAC	YES	YES	NO
6	48170398	2.21	CX	RAC	YES	YES	NO
6	48170332	2.21	CX	RAC	YES	YES	NO
6	48170438	2.21	CX	RAC	YES	YES	NO
6	48170312	2.21	CX	RAC	YES	YES	NO
6	48170126	2.21	CX	RAC	YES	YES	NO
6	48170166	2.21	CX	RAC	YES	YES	NO
6	48170252	2.21	CX	RAC	YES	YES	NO
6	48170186	2.21	CX	RAC	YES	YES	NO
6	48170378	2.21	CX	RAC	YES	YES	NO
6	48170338	2.21	CX	RAC	YES	YES	NO
6	48170358	2.21	CX	RAC	YES	YES	NO
6	48170272	2.21	CX	RAC	YES	YES	NO
6	48170232	2.21	CX	RAC	YES	YES	NO
6	48170020	2.21	CX	RAC	YES	YES	NO
6	48170318	2.21	CX	RAC	YES	YES	NO
6	48170292	2.21	CX	RAC	YES	YES	NO

6	48170192	2.21 CX	RAC	YES	YES	NO
6	48170066	2.21 CX	RAC	YES	YES	NO
6	48170212	2.21 CX	RAC	YES	YES	NO
6	48170106	2.21 CX	RAC	YES	YES	NO
6	48170172	2.21 CX	RAC	YES	YES	NO
6	986027574	2.21 CX	RAC	YES	YES	NO
6	48170326	2.21 CX	RAC	YES	YES	NO
6	48170432	2.21 CX	RAC	YES	YES	NO
6	48170346	2.21 CX	RAC	YES	YES	NO
6	48170306	2.21 CX	RAC	YES	YES	NO
6	48170046	2.21 CX	RAC	YES	YES	NO
6	48170086	2.21 CX	RAC	YES	YES	NO
6	48170180	2.21 CX	RAC	YES	YES	NO
6	48170200	2.21 CX	RAC	YES	YES	NO
6	48170392	2.21 CX	RAC	YES	YES	NO
6	48170412	2.21 CX	RAC	YES	YES	NO
6	48170220	2.21 CX	RAC	YES	YES	NO
6	48170206	2.21 CX	RAC	YES	YES	NO
6	48170100	2.21 CX	RAC	YES	YES	NO
6	48170140	2.21 CX	RAC	YES	YES	NO
6	48170352	2.21 CX	RAC	YES	YES	NO
6	48170120	2.21 CX	RAC	YES	YES	NO
6	48170286	2.21 CX	RAC	YES	YES	NO
6	48170258	2.21 CX	RAC	YES	YES	NO
6	48170298	2.21 CX	RAC	YES	YES	NO
6	48170404	2.21 CX	RAC	YES	YES	NO
6	48170384	2.21 CX	RAC	YES	YES	NO
6	48170152	2.21 CX	RAC	YES	YES	NO
6	48170364	2.21 CX	RAC	YES	YES	NO
6	48170410	2.21 CX	RAC	YES	YES	NO
6	48170238	2.21 CX	RAC	YES	YES	NO
6	48170344	2.21 CX	RAC	YES	YES	NO
6	48170132	2.21 CX	RAC	YES	YES	NO
6	48170430	2.21 CX	RAC	YES	YES	NO
6	48170278	2.21 CX	RAC	YES	YES	NO
6	48170416	2.21 CX	RAC	YES	YES	NO
6	48170396	2.21 CX	RAC	YES	YES	NO
6	48170350	2.21 CX	RAC	YES	YES	NO
6	48170264	2.21 CX	RAC	YES	YES	NO
6	48170390	2.21 CX	RAC	YES	YES	NO
6	48170370	2.21 CX	RAC	YES	YES	NO
6	48170198	2.21 CX	RAC	YES	YES	NO
6	48170304	2.21 CX	RAC	YES	YES	NO
6	48170112	2.21 CX	RAC	YES	YES	NO
6	48170270	2.21 CX	RAC	YES	YES	NO
6	48170164	2.21 CX	RAC	YES	YES	NO
6	48170204	2.21 CX	RAC	YES	YES	NO
6	48170012	2.21 CX	RAC	YES	YES	NO
6	48170324	2.21 CX	RAC	YES	YES	NO
6	48170052	2.21 CX	RAC	YES	YES	NO
6	48170284	2.21 CX	RAC	YES	YES	NO
6	48170072	2.21 CX	RAC	YES	YES	NO
6	48170092	2.21 CX	RAC	YES	YES	NO
6	48170078	2.21 CX	RAC	YES	YES	NO

6	48170184	2.21 CX	RAC	YES	YES	NO
6	48170424	2.21 CX	RAC	YES	YES	NO
6	48170138	2.21 CX	RAC	YES	YES	NO
6	48170032	2.21 CX	RAC	YES	YES	NO
6	48170118	2.21 CX	RAC	YES	YES	NO
6	48170330	2.21 CX	RAC	YES	YES	NO
6	48170224	2.21 CX	RAC	YES	YES	NO
6	48170244	2.21 CX	RAC	YES	YES	NO
6	48170310	2.21 CX	RAC	YES	YES	NO
6	48170290	2.21 CX	RAC	YES	YES	NO
6	48170098	2.21 CX	RAC	YES	YES	NO
6	48170144	2.21 CX	RAC	YES	YES	NO
6	48170104	2.21 CX	RAC	YES	YES	NO
6	48170084	2.21 CX	RAC	YES	YES	NO
6	48170058	2.21 CX	RAC	YES	YES	NO
6	48170250	2.21 CX	RAC	YES	YES	NO
6	48170436	2.21 CX	RAC	YES	YES	NO
6	48170218	2.21 CX	RAC	YES	YES	NO
6	48170158	2.21 CX	RAC	YES	YES	NO
6	48170178	2.21 CX	RAC	YES	YES	NO
6	48170124	2.21 CX	RAC	YES	YES	NO
6	48170018	2.21 CX	RAC	YES	YES	NO
6	48170038	2.21 CX	RAC	YES	YES	NO
6	48170334	2.21 CX	RAC	YES	YES	NO
6	48170228	2.21 CX	RAC	YES	YES	NO
6	48170294	2.21 CX	RAC	YES	YES	NO
6	48170248	2.21 CX	RAC	YES	YES	NO
6	48170434	2.21 CX	RAC	YES	YES	NO
6	48170440	2.21 CX	RAC	YES	YES	NO
6	48170314	2.21 CX	RAC	YES	YES	NO
6	48170022	2.21 CX	RAC	YES	YES	NO
6	48170308	2.21 CX	RAC	YES	YES	NO
6	48170042	2.21 CX	RAC	YES	YES	NO
6	48170142	2.21 CX	RAC	YES	YES	NO
6	48170122	2.21 CX	RAC	YES	YES	NO
6	48170360	2.21 CX	RAC	YES	YES	NO
6	48170406	2.21 CX	RAC	YES	YES	NO
6	48170128	2.21 CX	RAC	YES	YES	NO
6	48170268	2.21 CX	RAC	YES	YES	NO
6	48170414	2.21 CX	RAC	YES	YES	NO
6	986027573	2.21 CX	RAC	YES	YES	NO
6	48170374	2.21 CX	RAC	YES	YES	NO
6	48170274	2.21 CX	RAC	YES	YES	NO
6	48170082	2.21 CX	RAC	YES	YES	NO
6	48170174	2.21 CX	RAC	YES	YES	NO
6	48170320	2.21 CX	RAC	YES	YES	NO
6	48170208	2.21 CX	RAC	YES	YES	NO
6	48170102	2.21 CX	RAC	YES	YES	NO
6	48170188	2.21 CX	RAC	YES	YES	NO
6	48170354	2.21 CX	RAC	YES	YES	NO
6	48170168	2.21 CX	RAC	YES	YES	NO
6	48170288	2.21 CX	RAC	YES	YES	NO
6	48170088	2.21 CX	RAC	YES	YES	NO
6	48170380	2.21 CX	RAC	YES	YES	NO

6	48170280	2.21 CX	RAC	YES	YES	NO
6	48170062	2.21 CX	RAC	YES	YES	NO
6	48170148	2.21 CX	RAC	YES	YES	NO
6	48170394	2.21 CX	RAC	YES	YES	NO
6	48170154	2.21 CX	RAC	YES	YES	NO
6	48170400	2.21 CX	RAC	YES	YES	NO
6	48170260	2.21 CX	RAC	YES	YES	NO
6	48170094	2.21 CX	RAC	YES	YES	NO
6	48170068	2.21 CX	RAC	YES	YES	NO
6	48170340	2.21 CX	RAC	YES	YES	NO
6	48170300	2.21 CX	RAC	YES	YES	NO
6	48170194	2.21 CX	RAC	YES	YES	NO
6	48170108	2.21 CX	RAC	YES	YES	NO
6	48170008	2.21 CX	RAC	YES	YES	NO
6	48170254	2.21 CX	RAC	YES	YES	NO
6	48170240	2.21 CX	RAC	YES	YES	NO
6	48170134	2.21 CX	RAC	YES	YES	NO
6	48170028	2.21 CX	RAC	YES	YES	NO
6	48170420	2.21 CX	RAC	YES	YES	NO
6	48170426	2.21 CX	RAC	YES	YES	NO
6	48170386	2.21 CX	RAC	YES	YES	NO
6	48170382	2.21 CX	RAC	YES	YES	NO
6	48170376	2.21 CX	RAC	YES	YES	NO
6	48170234	2.21 CX	RAC	YES	YES	NO
6	48170048	2.21 CX	RAC	YES	YES	NO
6	48170214	2.21 CX	RAC	YES	YES	NO
6	48170114	2.21 CX	RAC	YES	YES	NO
6	986057242	2.21 CX	RAC	YES	YES	NO
6	48170114	2.21 CX	RAC	YES	YES	NO
6	986057242	2.21 CX	RAC	YES	YES	NO
6	48170070	2.21 CX	RAC	YES	YES	NO
6	48170276	2.21 CX	RAC	YES	YES	NO
6	48170170	2.21 CX	RAC	YES	YES	NO
6	48170182	2.21 CX	RAC	YES	YES	NO
6	48170076	2.21 CX	RAC	YES	YES	NO
6	48170162	2.21 CX	RAC	YES	YES	NO
6	48170190	2.21 CX	RAC	YES	YES	NO
6	48170090	2.21 CX	RAC	YES	YES	NO
6	48170262	2.21 CX	RAC	YES	YES	NO
6	48170096	2.21 CX	RAC	YES	YES	NO
6	48170202	2.21 CX	RAC	YES	YES	NO
6	48170256	2.21 CX	RAC	YES	YES	NO
6	48170156	2.21 CX	RAC	YES	YES	NO
6	48170302	2.21 CX	RAC	YES	YES	NO
6	48170056	2.21 CX	RAC	YES	YES	NO
6	48170282	2.21 CX	RAC	YES	YES	NO
6	48170388	2.21 CX	RAC	YES	YES	NO
6	48170110	2.21 CX	RAC	YES	YES	NO
6	48170348	2.21 CX	RAC	YES	YES	NO
6	48170016	2.21 CX	RAC	YES	YES	NO
6	48170064	2.21 CX	RAC	YES	YES	NO
6	48170050	2.21 CX	RAC	YES	YES	NO
6	48170342	2.21 CX	RAC	YES	YES	NO
6	48170010	2.21 CX	RAC	YES	YES	NO
6	48170150	2.21 CX	RAC	YES	YES	NO
6	48170296	2.21 CX	RAC	YES	YES	NO

6	48170196	2.21 CX	RAC	YES	YES	NO
6	48170242	2.21 CX	RAC	YES	YES	NO
6	48170036	2.21 CX	RAC	YES	YES	NO
6	48170428	2.21 CX	RAC	YES	YES	NO
6	48170422	2.21 CX	RAC	YES	YES	NO
6	48170230	2.21 CX	RAC	YES	YES	NO
6	48170328	2.21 CX	RAC	YES	YES	NO
6	48170130	2.21 CX	RAC	YES	YES	NO
6	48170044	2.21 CX	RAC	YES	YES	NO
6	48170216	2.21 CX	RAC	YES	YES	NO
6	48170336	2.21 CX	RAC	YES	YES	NO
6	48170322	2.21 CX	RAC	YES	YES	NO
6	48170136	2.21 CX	RAC	YES	YES	NO
6	48170030	2.21 CX	RAC	YES	YES	NO
6	48170356	2.21 CX	RAC	YES	YES	NO
6	48170402	2.21 CX	RAC	YES	YES	NO
6	48170116	2.21 CX	RAC	YES	YES	NO
6	48170236	2.21 CX	RAC	YES	YES	NO
6	48170210	2.21 CX	RAC	YES	YES	NO
6	48170024	2.21 CX	RAC	YES	YES	NO
6	48530252	2.22 CX	RAC	YES	YES	NO
6	48530060	2.22 CX	RAC	YES	YES	NO
6	48530272	2.22 CX	RAC	YES	YES	NO
6	48530020	2.22 CX	RAC	YES	YES	NO
6	48530126	2.22 CX	RAC	YES	YES	NO
6	48530180	2.22 CX	RAC	YES	YES	NO
6	48530100	2.22 CX	RAC	YES	YES	NO
6	48530074	2.22 CX	RAC	YES	YES	NO
6	48530100	2.22 CX	RAC	YES	YES	NO
6	48530074	2.22 CX	RAC	YES	YES	NO
6	48530054	2.22 CX	RAC	YES	YES	NO
6	48530266	2.22 CX	RAC	YES	YES	NO
6	48530034	2.22 CX	RAC	YES	YES	NO
6	48530140	2.22 CX	RAC	YES	YES	NO
6	48530014	2.22 CX	RAC	YES	YES	NO
6	48530040	2.22 CX	RAC	YES	YES	NO
6	48530232	2.22 CX	RAC	YES	YES	NO
6	48530146	2.22 CX	RAC	YES	YES	NO
6	48530166	2.22 CX	RAC	YES	YES	NO
6	48530186	2.22 CX	RAC	YES	YES	NO
6	48530246	2.22 CX	RAC	YES	YES	NO
6	48530226	2.22 CX	RAC	YES	YES	NO
6	48530206	2.22 CX	RAC	YES	YES	NO
6	48530094	2.22 CX	RAC	YES	YES	NO
6	48530200	2.22 CX	RAC	YES	YES	NO
6	48530220	2.22 CX	RAC	YES	YES	NO
6	48530260	2.22 CX	RAC	YES	YES	NO
6	48530240	2.22 CX	RAC	YES	YES	NO
6	48530114	2.22 CX	RAC	YES	YES	NO
6	48530134	2.22 CX	RAC	YES	YES	NO
6	48530062	2.22 CX	RAC	YES	YES	NO
6	48530082	2.22 CX	RAC	YES	YES	NO
6	48530102	2.22 CX	RAC	YES	YES	NO
6	48530122	2.22 CX	RAC	YES	YES	NO
6	48530036	2.22 CX	RAC	YES	YES	NO
6	48530182	2.22 CX	RAC	YES	YES	NO

6	48530202	2.22 CX	RAC	YES	YES	NO
6	48530268	2.22 CX	RAC	YES	YES	NO
6	48530056	2.22 CX	RAC	YES	YES	NO
6	48530162	2.22 CX	RAC	YES	YES	NO
6	48530248	2.22 CX	RAC	YES	YES	NO
6	48530142	2.22 CX	RAC	YES	YES	NO
6	48530008	2.22 CX	RAC	YES	YES	NO
6	48530048	2.22 CX	RAC	YES	YES	NO
6	48530154	2.22 CX	RAC	YES	YES	NO
6	48530028	2.22 CX	RAC	YES	YES	NO
6	48530108	2.22 CX	RAC	YES	YES	NO
6	48530194	2.22 CX	RAC	YES	YES	NO
6	48530068	2.22 CX	RAC	YES	YES	NO
6	48530234	2.22 CX	RAC	YES	YES	NO
6	48530128	2.22 CX	RAC	YES	YES	NO
6	48530088	2.22 CX	RAC	YES	YES	NO
6	48530214	2.22 CX	RAC	YES	YES	NO
6	48530174	2.22 CX	RAC	YES	YES	NO
6	48530254	2.22 CX	RAC	YES	YES	NO
6	48530168	2.22 CX	RAC	YES	YES	NO
6	48530148	2.22 CX	RAC	YES	YES	NO
6	48530274	2.22 CX	RAC	YES	YES	NO
6	48530042	2.22 CX	RAC	YES	YES	NO
6	48530022	2.22 CX	RAC	YES	YES	NO
6	48530016	2.22 CX	RAC	YES	YES	NO
6	48530188	2.22 CX	RAC	YES	YES	NO
6	48530228	2.22 CX	RAC	YES	YES	NO
6	48530208	2.22 CX	RAC	YES	YES	NO
6	48530228	2.22 CX	RAC	YES	YES	NO
6	48530208	2.22 CX	RAC	YES	YES	NO
6	48530218	2.22 CX	RAC	YES	YES	NO
6	48530172	2.22 CX	RAC	YES	YES	NO
6	48530032	2.22 CX	RAC	YES	YES	NO
6	48530026	2.22 CX	RAC	YES	YES	NO
6	48530078	2.22 CX	RAC	YES	YES	NO
6	48530212	2.22 CX	RAC	YES	YES	NO
6	48530224	2.22 CX	RAC	YES	YES	NO
6	48530118	2.22 CX	RAC	YES	YES	NO
6	48530258	2.22 CX	RAC	YES	YES	NO
6	48530072	2.22 CX	RAC	YES	YES	NO
6	48530264	2.22 CX	RAC	YES	YES	NO
6	48530018	2.22 CX	RAC	YES	YES	NO
6	48530164	2.22 CX	RAC	YES	YES	NO
6	48530158	2.22 CX	RAC	YES	YES	NO
6	48530132	2.22 CX	RAC	YES	YES	NO
6	48530046	2.22 CX	RAC	YES	YES	NO
6	48530138	2.22 CX	RAC	YES	YES	NO
6	48530144	2.22 CX	RAC	YES	YES	NO
6	48530038	2.22 CX	RAC	YES	YES	NO
6	48530238	2.22 CX	RAC	YES	YES	NO
6	48530052	2.22 CX	RAC	YES	YES	NO
6	48530098	2.22 CX	RAC	YES	YES	NO
6	48530244	2.22 CX	RAC	YES	YES	NO
6	48530198	2.22 CX	RAC	YES	YES	NO
6	48530006	2.22 CX	RAC	YES	YES	NO
6	48530152	2.22 CX	RAC	YES	YES	NO

6	48530058	2.22 CX	RAC	YES	YES	NO
6	48530012	2.22 CX	RAC	YES	YES	NO
6	48530112	2.22 CX	RAC	YES	YES	NO
6	48530184	2.22 CX	RAC	YES	YES	NO
6	48530204	2.22 CX	RAC	YES	YES	NO
6	48530178	2.22 CX	RAC	YES	YES	NO
6	48530192	2.22 CX	RAC	YES	YES	NO
6	48530092	2.22 CX	RAC	YES	YES	NO
6	48530156	2.22 CX	RAC	YES	YES	NO
6	48530236	2.22 CX	RAC	YES	YES	NO
6	48530242	2.22 CX	RAC	YES	YES	NO
6	48530196	2.22 CX	RAC	YES	YES	NO
6	48530050	2.22 CX	RAC	YES	YES	NO
6	48530010	2.22 CX	RAC	YES	YES	NO
6	48530096	2.22 CX	RAC	YES	YES	NO
6	48530090	2.22 CX	RAC	YES	YES	NO
6	48530110	2.22 CX	RAC	YES	YES	NO
6	48530276	2.22 CX	RAC	YES	YES	NO
6	48530084	2.22 CX	RAC	YES	YES	NO
6	48530190	2.22 CX	RAC	YES	YES	NO
6	48530076	2.22 CX	RAC	YES	YES	NO
6	48530222	2.22 CX	RAC	YES	YES	NO
6	48530030	2.22 CX	RAC	YES	YES	NO
6	48530176	2.22 CX	RAC	YES	YES	NO
6	48530070	2.22 CX	RAC	YES	YES	NO
6	48530216	2.22 CX	RAC	YES	YES	NO
6	48530116	2.22 CX	RAC	YES	YES	NO
6	48530262	2.22 CX	RAC	YES	YES	NO
6	48530136	2.22 CX	RAC	YES	YES	NO
6	48530124	2.22 CX	RAC	YES	YES	NO
6	48530170	2.22 CX	RAC	YES	YES	NO
6	48530024	2.22 CX	RAC	YES	YES	NO
6	48530270	2.22 CX	RAC	YES	YES	NO
6	48530210	2.22 CX	RAC	YES	YES	NO
6	48530064	2.22 CX	RAC	YES	YES	NO
6	48530230	2.22 CX	RAC	YES	YES	NO
6	48530256	2.22 CX	RAC	YES	YES	NO
6	48530250	2.22 CX	RAC	YES	YES	NO
6	48530130	2.22 CX	RAC	YES	YES	NO
6	48530044	2.22 CX	RAC	YES	YES	NO
6	48530150	2.22 CX	RAC	YES	YES	NO
6	48530104	2.22 CX	RAC	YES	YES	NO
6	48530004	2.22 CX	RAC	YES	YES	NO
6	48530120	2.22 CX	RAC	YES	YES	NO
6	48530160	2.22 CX	RAC	YES	YES	NO
6	48530066	2.22 CX	RAC	YES	YES	NO
6	48530106	2.22 CX	RAC	YES	YES	NO
6	48530086	2.22 CX	RAC	YES	YES	NO
6	48530080	2.22 CX	RAC	YES	YES	NO
6	38470032	1.42 CX	RAC	YES	YES	NO
6	38470044	1.42 CX	RAC	YES	YES	NO
6	38470018	1.42 CX	RAC	YES	YES	NO
6	38470038	1.42 CX	RAC	YES	YES	NO
6	38470012	1.42 CX	RAC	YES	YES	NO

6	38470036	1.42 CX	RAC	YES	YES	NO
6	38470016	1.42 CX	RAC	YES	YES	NO
6	38470004	1.42 CX	RAC	YES	YES	NO
6	38470010	1.42 CX	RAC	YES	YES	NO
6	38470024	1.42 CX	RAC	YES	YES	NO
6	38470030	1.42 CX	RAC	YES	YES	NO
6	38470006	1.42 CX	RAC	YES	YES	NO
6	38470046	1.42 CX	RAC	YES	YES	NO
6	38470026	1.42 CX	RAC	YES	YES	NO
6	38470020	1.42 CX	RAC	YES	YES	NO
6	38470040	1.42 CX	RAC	YES	YES	NO
6	38470014	1.42 CX	RAC	YES	YES	NO
6	38470042	1.42 CX	RAC	YES	YES	NO
6	38470008	1.42 CX	RAC	YES	YES	NO
6	38470028	1.42 CX	RAC	YES	YES	NO
6	38470034	1.42 CX	RAC	YES	YES	NO
6	38470022	1.42 CX	RAC	YES	YES	NO
6	48750000	0.23 CX	RAC	YES	YES	NO
6	38740000	0.95 CX	RAC	YES	YES	NO
6	38685000	0.13 CX	RAC	YES	YES	NO
6	47840000	0.08 CX	RAC	YES	YES	NO
6	47860000	0.12 CX	RAC	YES	YES	NO
6	47830000	0.04 CX	RAC	YES	YES	NO
6	38550000	0.23 CX	RAC	YES	YES	NO
6	48390000	0.11 CX	RAC	YES	YES	NO
6	48170004	2.21 CX	RAC	YES	YES	NO
6	47960000	0.57 CX	RAC	YES	YES	NO
6	38540000	0.24 CX	RAC	YES	YES	NO
6	38430000	0.48 CX	RAC	YES	YES	NO
6	48350000	0.20 CX		0 YES	YES	NO
6	48300000	0.09 CX	RAC	YES	YES	NO
6	48380000	0.12 CX	RAC	YES	YES	NO
6	48040000	0.12 CX	RAC	YES	YES	NO
6	48120000	0.93 CX	RAC	YES	YES	NO
6	38610000	0.09 CX	RAC	YES	YES	NO
6	47950000	0.23 CX	RAC	YES	YES	NO
6	47940000	0.23 CX	RAC	YES	YES	NO
6	48110000	0.12 CX	RAC	YES	YES	NO
6	48250000	0.23 CX	RAC	YES	YES	NO
6	47890000	0.23 CX	RAC	YES	YES	NO
6	47930000	0.11 CX	RAC	YES	YES	NO
6	48098000	0.07 CX	RAC	YES	YES	NO
6	48530002	2.22 CX	RAC	YES	YES	NO
6	46230000	0.09 CX	RAC	YES	YES	NO
6	38580000	0.24 CX	RAC	YES	YES	NO
6	48710000	2.12 CX	RAC	YES	YES	NO
6	38515000	0.12 CX	RAC	YES	YES	NO
6	48290000	0.23 CX	RAC	YES	YES	NO
6	47880000	0.23 CX	RAC	YES	YES	NO
6	38665000	0.10 CX	RAC	YES	YES	NO
6	48080000	0.18 CX	RAC	YES	YES	NO
6	46130000	0.12 CX	RAC	YES	YES	NO
6	48102000	0.18 CX	RAC	YES	YES	NO
6	38520000	0.05 CX	RAC	YES	YES	NO

6	38470002	1.42 CX	RAC	YES	YES	NO
6	48310000	0.14 CX	RAC	YES	YES	NO
6	48280000	0.23 CX	RAC	YES	YES	NO
6	38620000	0.13 CX	RAC	YES	YES	NO
6	38660000	0.12 CX	RAC	YES	YES	NO
6	47900000	0.11 CX	RAC	YES	YES	NO
6	47920000	0.11 CX	RAC	YES	YES	NO
6	47910000	0.11 CX	RAC	YES	YES	NO
6	38560000	0.47 CX	RAC	YES	YES	NO
6	38600000	0.13 CX	RAC	YES	YES	NO
6	38680000	0.24 CX	RAC	YES	YES	NO
6	48094000	0.09 CX	RAC	YES	YES	NO
6	48050000	0.11 CX	RAC	YES	YES	NO
6	48090000	0.06 CX	RAC	YES	YES	NO
6	47870000	0.23 CX	RAC	YES	YES	NO
6	46170000	0.10 CX	RAC	YES	YES	NO
6	46280000	0.11 CX	RAC	YES	YES	NO
6	38670000	0.23 CX	RAC	YES	YES	NO
6	38710000	0.22 CX	RAC	YES	YES	NO
6	38690000	0.13 CX	RAC	YES	YES	NO
6	38820000	0.68 CX	RAC	YES	YES	NO
6	38640000	0.13 CX	RAC	YES	YES	NO
6	48320000	0.72 CX	RAC	YES	YES	NO
6	47990000	0.12 CX	RAC	YES	YES	NO
6	47985000	0.12 CX	RAC	YES	YES	NO
6	47988000	0.11 CX	RAC	YES	YES	NO
6	48620000	1.34 CX	RAC	YES	YES	NO
7	39530000	0.24 CX	RAC	YES	YES	NO
7	39440082	0.92 CX	RAC	YES	YES	NO
7	39440062	0.92 CX	RAC	YES	YES	NO
7	39440048	0.92 CX	RAC	YES	YES	NO
7	39440064	0.92 CX	RAC	YES	YES	NO
7	39440076	0.92 CX	RAC	YES	YES	NO
7	39440016	0.92 CX	RAC	YES	YES	NO
7	39440056	0.92 CX	RAC	YES	YES	NO
7	39440036	0.92 CX	RAC	YES	YES	NO
7	39440030	0.92 CX	RAC	YES	YES	NO
7	39440096	0.92 CX	RAC	YES	YES	NO
7	39440010	0.92 CX	RAC	YES	YES	NO
7	39440070	0.92 CX	RAC	YES	YES	NO
7	39440050	0.92 CX	RAC	YES	YES	NO
7	39440090	0.92 CX	RAC	YES	YES	NO
7	39440004	0.92 CX	RAC	YES	YES	NO
7	39440024	0.92 CX	RAC	YES	YES	NO
7	39440044	0.92 CX	RAC	YES	YES	NO
7	39440026	0.92 CX	RAC	YES	YES	NO
7	39440080	0.92 CX	RAC	YES	YES	NO
7	39440066	0.92 CX	RAC	YES	YES	NO
7	39440020	0.92 CX	RAC	YES	YES	NO
7	39440014	0.92 CX	RAC	YES	YES	NO
7	39440086	0.92 CX	RAC	YES	YES	NO
7	39440100	0.92 CX	RAC	YES	YES	NO
7	39440054	0.92 CX	RAC	YES	YES	NO
7	39440006	0.92 CX	RAC	YES	YES	NO

7	39440040	0.92 CX	RAC	YES	YES	NO
7	39440060	0.92 CX	RAC	YES	YES	NO
7	39440034	0.92 CX	RAC	YES	YES	NO
7	39440046	0.92 CX	RAC	YES	YES	NO
7	39440084	0.92 CX	RAC	YES	YES	NO
7	39440098	0.92 CX	RAC	YES	YES	NO
7	39440058	0.92 CX	RAC	YES	YES	NO
7	39440038	0.92 CX	RAC	YES	YES	NO
7	39440012	0.92 CX	RAC	YES	YES	NO
7	39440078	0.92 CX	RAC	YES	YES	NO
7	39440018	0.92 CX	RAC	YES	YES	NO
7	39440032	0.92 CX	RAC	YES	YES	NO
7	39440072	0.92 CX	RAC	YES	YES	NO
7	39440092	0.92 CX	RAC	YES	YES	NO
7	39440052	0.92 CX	RAC	YES	YES	NO
7	39440042	0.92 CX	RAC	YES	YES	NO
7	39440008	0.92 CX	RAC	YES	YES	NO
7	39440094	0.92 CX	RAC	YES	YES	NO
7	39440074	0.92 CX	RAC	YES	YES	NO
7	39440028	0.92 CX	RAC	YES	YES	NO
7	39440068	0.92 CX	RAC	YES	YES	NO
7	39440088	0.92 CX	RAC	YES	YES	NO
7	39440022	0.92 CX	RAC	YES	YES	NO
7	986033592	0.92 CX	RAC	YES	YES	NO
7	39480000	0.24 CX	RAC	YES	YES	NO
7	39560000	0.24 CX	RAC	YES	YES	NO
7	47160000	0.22 CX	RAC	YES	YES	NO
7	39630000	0.93 CX	RAC	YES	YES	NO
7	39540000	0.22 CX	RAC	YES	YES	NO
7	39690000	0.11 CX	RAC	YES	YES	NO
7	39730000	0.23 CX	RAC	YES	YES	NO
7	40220000	0.11 CX	RAC	YES	YES	NO
7	39780000	0.11 CX	RAC	YES	YES	NO
7	39490000	0.46 CX	RAC	YES	YES	NO
7	40210000	0.23 CX	RAC	YES	YES	NO
7	40170000	0.23 CX	RAC	YES	YES	NO
7	40005000	0.37 CX	RAC	YES	YES	NO
7	40130000	0.46 CX	RAC	YES	YES	NO
7	40230000	0.12 CX	RAC	YES	YES	NO
7	39520000	0.24 CX	RAC	YES	YES	NO
7	39530001	0.24 CX	RAC	YES	YES	NO
7	39600000	0.22 CX	RAC	YES	YES	NO
7	39610000	0.12 CX	RAC	YES	YES	NO
7	39590000	0.22 CX	RAC	YES	YES	NO
7	39620000	0.11 CX	RAC	YES	YES	NO
7	39440002	0.92 CX	RAC	YES	YES	NO
7	39570000	0.24 CX	RAC	YES	YES	NO
7	39810000	0.23 CX	RAC	YES	YES	NO
7	40000000	0.70 CX	RAC	YES	YES	NO
7	47299000	0.23 CX	RAC	YES	YES	NO
7	39640000	0.92 CX	RAC	YES	YES	NO
7	39740000	0.23 CX	RAC	YES	YES	NO
7	39720000	0.34 CX	RAC	YES	YES	NO
7	39431000	1.41 CX	RAC	YES	YES	NO

7	39431001	0.92	CX	RAC	YES	YES	NO
7	40110000	0.92	CX	RAC	YES	YES	NO
8	29395000	70.26	R-9	RAC	NO	NO	NO
8	986055692	1.74	R-30	MU	YES	YES	NO
8	29473016	0.10	R-22	MSN	YES	YES	NO
8	29473017	0.11	R-22	MSN	YES	YES	NO
8	29473034	1.78	CC	MU	YES	YES	NO
8	29467077	0.28	R-35	RAC	YES	YES	NO
8	29472013	0.26	CC	RAC	YES	YES	NO
8	29473044	9.65	R-30	MSN	YES	YES	NO
8	29450040	0.72	CC	RAC	YES	YES	NO
8	29473047	2.66	R-30	MU	YES	YES	NO
8	29467078	5.57	R-35	MU	YES	YES	NO
8	108850000	1.77	CG	RAC	YES	YES	NO
8	108855000	0.27	CG	RAC	YES	YES	NO
8	108830000	1.83	R-30	MU	YES	YES	NO
8	29473042	9.22	R-30	MSN	YES	YES	NO
8	986037317	1.74	R-30	MU	YES	YES	NO
8	29473041	4.00	CC	RAC	YES	YES	NO
8	29472018	19.69	OCI	RAC	YES	YES	NO
8	986040719	20.37	OCI	RAC	YES	YES	NO
8	108854000	1.18	CG	RAC	YES	YES	NO
9	105529410	4.14	R-22	MSN	YES	YES	NO
9	105529470	4.14	R-22	MSN	YES	YES	NO
9	105529482	4.14	R-22	MSN	YES	YES	NO
9	105529450	4.14	R-22	MSN	YES	YES	NO
9	105529430	4.14	R-22	MSN	YES	YES	NO
9	105529476	4.14	R-22	MSN	YES	YES	NO
9	105529462	4.14	R-22	MSN	YES	YES	NO
9	105529442	4.14	R-22	MSN	YES	YES	NO
9	105529436	4.14	R-22	MSN	YES	YES	NO
9	105529456	4.14	R-22	MSN	YES	YES	NO
9	105529416	4.14	R-22	MSN	YES	YES	NO
9	105529422	4.14	R-22	MSN	YES	YES	NO
9	105529490	4.14	R-22	MSN	YES	YES	NO
9	105529468	4.14	R-22	MSN	YES	YES	NO
9	105529448	4.14	R-22	MSN	YES	YES	NO
9	105529402	4.14	R-22	MSN	YES	YES	NO
9	105529428	4.14	R-22	MSN	YES	YES	NO
9	105529408	4.14	R-22	MSN	YES	YES	NO
9	105529488	4.14	R-22	MSN	YES	YES	NO
9	105529474	4.14	R-22	MSN	YES	YES	NO
9	105529454	4.14	R-22	MSN	YES	YES	NO
9	105529434	4.14	R-22	MSN	YES	YES	NO
9	105529478	4.14	R-22	MSN	YES	YES	NO
9	105529418	4.14	R-22	MSN	YES	YES	NO
9	105529412	4.14	R-22	MSN	YES	YES	NO
9	105529414	4.14	R-22	MSN	YES	YES	NO
9	105529438	4.14	R-22	MSN	YES	YES	NO
9	105529458	4.14	R-22	MSN	YES	YES	NO
9	105529484	4.14	R-22	MSN	YES	YES	NO
9	105529444	4.14	R-22	MSN	YES	YES	NO
9	105529464	4.14	R-22	MSN	YES	YES	NO
9	105529404	4.14	R-22	MSN	YES	YES	NO

9	105529460	4.14	R-22	MSN	YES	YES	NO
9	105529424	4.14	R-22	MSN	YES	YES	NO
9	105529466	4.14	R-22	MSN	YES	YES	NO
9	105529472	4.14	R-22	MSN	YES	YES	NO
9	105529446	4.14	R-22	MSN	YES	YES	NO
9	105529452	4.14	R-22	MSN	YES	YES	NO
9	105529420	4.14	R-22	MSN	YES	YES	NO
9	105529406	4.14	R-22	MSN	YES	YES	NO
9	105529486	4.14	R-22	MSN	YES	YES	NO
9	105529440	4.14	R-22	MSN	YES	YES	NO
9	105529426	4.14	R-22	MSN	YES	YES	NO
9	105529432	4.14	R-22	MSN	YES	YES	NO
9	160258000	1.63	CG	RAC	YES	YES	NO
9	160258006	1.30	CG	RAC	YES	YES	NO
9	105529400	4.14	R-22	MSN	YES	YES	NO
9	160261000	20.60	CG	RAC	YES	YES	NO
10	986052057	53.13	CPX	IC	YES	YES	NO
10	38279924	4.36	CPX		0 YES	YES	NO
10	38279961	3.53	CPX	IC	YES	YES	NO
10	38279929	52.75	CPX	IC	YES	YES	NO
11	986059637	0.12	CX	RAC	YES	YES	NO
11	986059636	0.12	CX	RAC	YES	YES	NO
11	986059635	0.12	CX	RAC	YES	YES	NO
11	40150000	0.11	CX	RAC	YES	YES	NO
11	40200000	0.21	CX	RAC	YES	YES	NO
11	40250000	0.23	CX	RAC	YES	YES	NO
11	40310000	0.23	CX	RAC	YES	YES	NO
11	40300000	0.23	CX	RAC	YES	YES	NO
11	52550000	0.08	CX	RAC	YES	YES	NO
11	52530000	0.25	CX	RAC	YES	YES	NO
11	47294000	0.20	CX	RAC	YES	YES	NO
11	40410000	0.12	CX	RAC	YES	YES	NO
11	40420000	0.11	CX	RAC	YES	YES	NO
11	40415000	0.11	CX	RAC	YES	YES	NO
11	41030000	0.11	CX	RAC	YES	YES	NO
11	41205000	0.10	CX	RAC	YES	YES	NO
11	41210000	0.13	CX	RAC	YES	YES	NO
11	41170000	0.11	CC	RAC	YES	YES	NO
11	41200000	0.23	CX	RAC	YES	YES	NO
11	41250000	0.11	CX	RAC	YES	YES	NO
11	40260000	0.25	CX	RAC	YES	YES	NO
11	40240000	0.22	CX	RAC	YES	YES	NO
11	52570000	0.13	CX	RAC	YES	YES	NO
11	41050000	0.11	CX	RAC	YES	YES	NO
11	41140000	0.12	CX	RAC	YES	YES	NO
11	41240000	0.11	CC	RAC	YES	YES	NO
11	40950000	0.23	CX	RAC	YES	YES	NO
11	40330000	0.46	CX	RAC	YES	YES	NO
11	40395000	0.11	CX	RAC	YES	YES	NO
11	47291000	0.29	CX	RAC	YES	YES	NO
11	40940000	0.46	CX	RAC	YES	YES	NO
11	40990000	0.11	CX	RAC	YES	YES	NO
11	40380000	0.11	CX	RAC	YES	YES	NO
11	40190000	0.22	CX	RAC	YES	YES	NO

11	40400000	0.34	CX	RAC	YES	YES	NO
11	40390000	0.11	CX	RAC	YES	YES	NO
11	52520000	0.13	CX	RAC	YES	YES	NO
11	40440000	0.58	CX	RAC	YES	YES	NO
11	41010000	0.11	CX	RAC	YES	YES	NO
11	40960000	0.23	CX	RAC	YES	YES	NO
11	41260000	0.23	CX	RAC	YES	YES	NO
11	40280000	0.03	CX	RAC	YES	YES	NO
11	40740000	0.04	CX	RAC	YES	YES	NO
11	52540000	0.07	CX	RAC	YES	YES	NO
11	40980000	0.11	CX	RAC	YES	YES	NO
11	41020000	0.12	CX	RAC	YES	YES	NO
11	41040000	0.12	CX	RAC	YES	YES	NO
11	41255000	0.11	CX	RAC	YES	YES	NO
11	40350000	0.23	CX	RAC	YES	YES	NO
11	40750000	0.08	CX	RAC	YES	YES	NO
11	41180000	0.34	CC	RAC	YES	YES	NO
11	52560000	0.11	CX	RAC	YES	YES	NO
11	47296000	0.20	CX	RAC	YES	YES	NO
11	986038526	0.34	CX	RAC	YES	YES	NO
11	40485000	0.33	CX	RAC	YES	YES	NO
11	40890000	0.46	CX	RAC	YES	YES	NO
11	40870000	0.46	CX	RAC	YES	YES	NO
11	40290000	0.21	CX	RAC	YES	YES	NO
11	40790000	0.92	CX	RAC	YES	YES	NO
11	46390000	1.00	CX	RAC	YES	YES	NO
12	38279907	23.53	CPX	IC	YES	YES	NO
12	38279909	4.48	CPX	IC	YES	YES	NO
12	38279920	9.04	CPX	IC	YES	YES	NO
12	38279934	0.51	CPX	POS	YES	YES	NO
12	38279937	9.36	CPX	POS	YES	YES	NO
12	41410000	0.20	CC	RAC	YES	YES	NO
13	36630000	0.11	R-9	MU	YES	NO	YES
13	36440000	0.24	R-9	MU	YES	NO	YES
13	36625000	0.11	R-9	MU	YES	NO	YES
13	36635000	0.11	R-9	MU	YES	NO	YES
13	36430000	0.12	R-9	MU	YES	NO	YES
13	36626000	0.11	R-9	MU	YES	NO	YES
13	36435000	0.12	R-9	MU	YES	NO	YES
13	36450000	0.23	R-9	MU	YES	NO	YES
13	35771150	0.13	R-9	MU	YES	NO	YES
13	32850000	0.10	R-9	MU	YES	NO	YES
13	32860000	0.10	R-9	MU	YES	NO	YES
13	35771160	0.13	R-9	MU	YES	NO	YES
13	35771210	0.13	R-9	MU	YES	NO	YES
13	33140000	0.12	R-9	MSN	YES	NO	YES
13	35398000	0.27	R-9	MSN	YES	NO	YES
13	35364000	0.21	R-9	MSN	YES	NO	YES
13	33142000	0.10	R-9	MSN	YES	NO	YES
13	36460000	0.12	R-9	MU	YES	NO	YES
13	36465000	0.12	R-9	MU	YES	NO	YES
13	35771010	0.12	R-9	MU	YES	NO	YES
13	35771140	0.14	R-9	MU	YES	NO	YES
13	36590000	0.12	R-9	MU	YES	NO	YES

13	35771020	0.12 R-9	MU	YES	NO	YES
13	36571000	0.22 R-9	MU	YES	NO	YES
13	35771130	0.14 R-9	MU	YES	NO	YES
13	32896000	0.10 R-9	MU	YES	NO	YES
13	32895000	0.10 R-9	MU	YES	NO	YES
13	36580000	0.11 R-9	MU	YES	NO	YES
13	35771030	0.12 R-9	MU	YES	NO	YES
13	35771120	0.14 R-9	MU	YES	NO	YES
13	35771170	0.13 R-9	MU	YES	NO	YES
13	32870000	0.10 R-9	MU	YES	NO	YES
13	32890000	0.11 R-9	MU	YES	NO	YES
13	35255000	0.15 R-9	MU	YES	NO	YES
13	36470000	0.12 R-9	MSN	YES	NO	YES
13	36420000	0.12 R-9	MSN	YES	NO	YES
13	35233005	0.22 R-9	MU	YES	NO	YES
13	35771040	0.12 R-9	MU	YES	NO	YES
13	35771110	0.14 R-9	MU	YES	NO	YES
13	32880000	0.11 R-9	MU	YES	NO	YES
13	36471000	0.12 R-9	MSN	YES	NO	YES
13	36415000	0.12 R-9	MSN	YES	NO	YES
13	35233000	0.13 R-9	MU	YES	NO	YES
13	36621000	0.11 R-9	MSN	YES	NO	YES
13	35771180	0.13 R-9	MU	YES	NO	YES
13	35771050	0.12 R-9	MU	YES	NO	YES
13	36490000	0.12 R-9	MSN	YES	NO	YES
13	36410000	0.12 R-9	MSN	YES	NO	YES
13	35771100	0.14 R-9	MU	YES	NO	YES
13	36620000	0.11 R-9	MSN	YES	NO	YES
13	36616000	0.11 R-9	MSN	YES	NO	YES
13	36495000	0.12 R-9	MSN	YES	NO	YES
13	36400000	0.12 R-9	MSN	YES	NO	YES
13	35771190	0.13 R-9	MU	YES	NO	YES
13	35771060	0.12 R-9	MU	YES	NO	YES
13	32270000	0.11 R-9	MU	YES	NO	YES
13	35771090	0.14 R-9	MU	YES	NO	YES
13	36560000	0.17 R-9	MSN	YES	NO	YES
13	36615000	0.11 R-9	MSN	YES	NO	YES
13	36500000	0.12 R-9	MSN	YES	NO	YES
13	36395000	0.12 R-9	MSN	YES	NO	YES
13	35303000	0.40 CN	MU	YES	NO	YES
13	35771200	0.13 R-9	MU	YES	NO	YES
13	35248000	0.14 R-9	MU	NO	NO	NO
13	36610000	0.17 R-9	MSN	NO	NO	NO
13	36555000	0.11 R-9	MSN	NO	NO	NO
13	36570000	0.22 R-9	MSN	NO	NO	NO
13	36510000	0.24 R-9	MSN	NO	NO	NO
13	35771070	0.12 R-9	MU	NO	NO	NO
13	35771080	0.14 R-9	MU	NO	NO	NO
13	32920000	0.16 R-9	MSN	NO	NO	NO
13	36550000	0.11 R-9	MSN	NO	NO	NO
13	33005000	0.21 R-9	MSN	NO	NO	NO
13	36565000	0.17 R-9	MSN	NO	NO	NO
13	36380000	0.12 R-9	MSN	NO	NO	NO
13	36601000	0.16 R-9	MSN	NO	NO	NO

13	33002000	0.11	R-9	MSN	NO	NO	NO
13	32930000	0.11	R-9	MSN	NO	NO	NO
13	36515000	0.12	R-9	MSN	NO	NO	NO
13	36375000	0.12	R-9	MSN	NO	NO	NO
13	33000000	0.11	R-9	MSN	NO	NO	NO
13	36540000	0.11	R-9	MSN	NO	NO	NO
13	35288000	0.12	R-9	MSN	NO	NO	NO
13	36255120	0.12	R-9	MU	NO	NO	NO
13	36255110	0.12	R-9	MU	NO	NO	NO
13	36600000	0.23	R-9	MSN	NO	NO	NO
13	36255100	0.11	R-9	MU	NO	NO	NO
13	36255090	0.12	R-9	MU	NO	NO	NO
13	32980000	0.21	R-9	MSN	NO	NO	NO
13	35279000	0.12	R-9	MSN	NO	NO	NO
13	36520000	0.12	R-9	MSN	NO	NO	NO
13	36370000	0.12	R-9	MSN	NO	NO	NO
13	32945000	0.11	R-9	MSN	NO	NO	NO
13	35234000	0.15	R-9	MSN	NO	NO	NO
13	32200000	0.12	R-9	MU	NO	NO	NO
13	35256000	0.16	R-9	MSN	NO	NO	NO
13	32940000	0.11	R-9	MSN	NO	NO	NO
13	33145000	0.11	R-9	MSN	NO	NO	NO
13	986026588	0.11	R-9	MSN	NO	NO	NO
13	36530000	0.11	R-9	MSN	NO	NO	NO
13	33150000	0.11	R-9	MSN	NO	NO	NO
13	33160000	0.21	R-9	MSN	NO	NO	NO
13	32970000	0.11	R-9	MSN	NO	NO	NO
13	35232000	0.22	R-9	MSN	NO	NO	NO
13	35232000	0.22	R-9	MSN	NO	NO	NO
13	35320000	0.15	R-9	MSN	NO	NO	NO
13	32265000	0.12	R-9	MSN	NO	NO	NO
13	35338000	0.13	R-9	MSN	NO	NO	NO
13	33165000	0.10	R-9	MSN	YES	NO	YES
13	36255130	0.12	R-9	MU	NO	NO	NO
13	36255140	0.11	R-9	MU	NO	NO	NO
13	36255150	0.12	R-9	MU	NO	NO	NO
13	35334000	0.23	R-9	MSN	NO	NO	NO
13	36255160	0.11	R-9	MU	NO	NO	NO
13	35330000	0.12	R-9	MSN	NO	NO	NO
13	33180000	0.12	R-9	MSN	NO	NO	NO
13	32210000	0.11	R-9	MSN	NO	NO	NO
13	35187000	0.20	R-9	MSN	NO	NO	NO
13	35316000	0.09	R-9	MSN	NO	NO	NO
13	36255080	0.12	R-9	MSN	NO	NO	NO
13	36255070	0.12	R-9	MSN	NO	NO	NO
13	35286000	0.28	R-9	MSN	NO	NO	NO
13	36255360	0.13	R-9	MU	NO	NO	NO
13	36255040	0.09	R-9	MSN	NO	NO	NO
13	36255060	0.12	R-9	MSN	NO	NO	NO
13	35223000	0.16	R-9	MSN	NO	NO	NO
13	36255050	0.10	R-9	MSN	NO	NO	NO
13	36255030	0.12	R-9	MSN	NO	NO	NO
13	35295000	0.10	R-9	MSN	NO	NO	NO
13	36255170	0.12	R-9	MSN	NO	NO	NO
13	36255180	0.12	R-9	MSN	NO	NO	NO

13	36255190	0.11	R-9	MSN	NO	NO	NO
13	36255200	0.11	R-9	MSN	NO	NO	NO
13	35181005	2.60	Park	POS	NO	NO	NO
13	36390000	0.12	R-9	MSN	NO	NO	NO
13	35225000	13.96	R-9	IC	NO	NO	NO
13	32900004	0.21	R-22	MSN	YES	YES	NO
13	32900006	0.21	R-22	MSN	YES	YES	NO
13	32900008	0.21	R-22	MSN	YES	YES	NO
13	36990030	0.21	R-18	MU	YES	YES	NO
13	36990036	0.21	R-18	MU	YES	YES	NO
13	36990032	0.21	R-18	MU	YES	YES	NO
13	36990034	0.21	R-18	MU	YES	YES	NO
13	33011000	0.11	R-22	MSN	YES	YES	NO
13	33020000	0.11	R-22	MSN	YES	YES	NO
13	33050000	0.11	R-22	MSN	YES	YES	NO
13	33075000	0.01	R-22		0 YES	YES	NO
13	32900002	0.21	R-22	MSN	YES	YES	NO
13	35274000	0.12	R-30	MU	YES	YES	NO
13	35222000	0.13	R-30	MSN	YES	YES	NO
13	35237000	0.16	R-30	MSN	YES	YES	NO
13	35181000	1.78	R-18	MU	YES	YES	NO
13	33025000	0.84	R-22	MU	YES	YES	NO
13	30863000	0.37	R-18	MU	YES	YES	NO
13	33010000	0.11	R-22	MSN	YES	YES	NO
13	33095000	0.10	R-22	MSN	YES	YES	NO
13	32910000	0.16	R-22	POS	YES	YES	NO
13	33240000	0.21	CC	MU	YES	YES	NO
13	35276000	0.14	R-30	MU	YES	YES	NO
13	30909000	0.10	R-18	MU	YES	YES	NO
13	30864000	1.40	R-18	MU	YES	YES	NO
13	31055000	1.11	R-18	MU	YES	YES	NO
13	33130000	0.21	CC	MU	YES	YES	NO
13	30845000	0.86	R-18	MU	YES	YES	NO
13	33190000	0.11	R-18	MU	YES	YES	NO
13	33210000	0.21	R-18	MU	YES	YES	NO
13	33220000	0.11	R-18	MU	YES	YES	NO
13	33230000	0.11	R-18	MU	YES	YES	NO
13	33235000	0.11	R-18	MU	YES	YES	NO
13	35333000	0.14	R-30	MSN	YES	YES	NO
13	30866000	0.36	R-18	MU	YES	YES	NO
13	33090000	0.11	R-22	MSN	YES	YES	NO
13	33080000	0.10	R-22	MSN	YES	YES	NO
13	33070000	0.11	R-22	MSN	YES	YES	NO
13	33060000	0.11	R-22	MSN	YES	YES	NO
13	33055000	0.11	R-22	MSN	YES	YES	NO
13	32820000	0.51	R-22	MU	YES	YES	NO
13	35275000	0.23	R-30	MSN	YES	YES	NO
13	35342000	0.22	R-30	MSN	YES	YES	NO
13	30925000	0.56	R-18	MU	YES	YES	NO
13	33120000	0.07	CC	MU	YES	YES	NO
13	33122000	0.07	CC	MU	YES	YES	NO
13	33125000	0.07	CC	MU	YES	YES	NO
13	33110000	0.08	CC	MU	YES	YES	NO
13	33100000	0.23	CC	MU	YES	YES	NO

13	36990028	0.21	R-18	MU	YES	YES	NO
13	30843000	0.16	R-18	MU	YES	YES	NO
13	30849000	1.15	R-22	MU	YES	YES	NO
13	35365000	0.15	R-30	MSN	YES	YES	NO
13	35249000	0.05	R-30	MSN	YES	YES	NO
13	30872000	2.84	CC	MU	YES	YES	NO
14	53200000	0.29	R-9	MU	YES	NO	YES
14	53220000	0.25	R-9	MU	YES	NO	YES
14	53630000	0.10	R-9	RAC	YES	NO	YES
14	53610000	0.09	R-9	RAC	YES	NO	YES
14	53235000	0.26	R-9	MU	YES	NO	YES
14	53230000	0.23	R-9	MU	YES	NO	YES
14	53620000	0.10	R-9	RAC	YES	NO	YES
14	41780000	0.11	R-9	RAC	YES	NO	YES
14	53685000	0.11	R-9	RAC	YES	NO	YES
14	41770000	0.14	R-9	RAC	YES	NO	YES
14	53680000	0.11	R-9	RAC	YES	NO	YES
14	53880000	0.21	R-9	MU	YES	NO	YES
14	53950000	0.11	R-9	MU	YES	NO	YES
14	53940000	0.18	R-9	MU	YES	NO	YES
14	52990000	0.12	R-9	MU	YES	NO	YES
14	53930000	0.09	R-9	MU	YES	NO	YES
14	53920000	0.21	R-9	MU	YES	NO	YES
14	53970000	0.09	R-9	MU	YES	NO	YES
14	45688000	0.11	R-9	MU	YES	NO	YES
14	53800000	0.11	R-9	RAC	YES	NO	YES
14	53600000	0.09	R-9	RAC	YES	NO	YES
14	53810000	0.18	R-9	RAC	YES	NO	YES
14	53600000	0.09	R-9	RAC	YES	NO	YES
14	53810000	0.18	R-9	RAC	YES	NO	YES
14	53590000	0.21	R-9	RAC	YES	NO	YES
14	46700000	5.84	R-9	MSN	NO	NO	NO
14	53820000	0.18	R-9	RAC	YES	NO	YES
14	53870000	0.11	R-9	RAC	YES	NO	YES
14	53830000	0.11	R-9	RAC	YES	NO	YES
14	53860000	0.14	R-9	RAC	YES	NO	YES
14	53710000	0.12	R-9	RAC	YES	NO	YES
14	53180000	0.11	R-9	MSN	YES	NO	YES
14	53850000	0.14	R-9	RAC	NO	NO	NO
14	53845000	0.09	R-9	RAC	NO	NO	NO
14	53700000	0.12	R-9	RAC	NO	NO	NO
14	53720000	0.12	R-9	RAC	NO	NO	NO
14	53840000	0.11	R-9	RAC	NO	NO	NO
14	53690000	0.12	R-9	RAC	NO	NO	NO
14	53730000	0.12	R-9	RAC	NO	NO	NO
14	53790000	0.10	R-9	RAC	NO	NO	NO
14	53740000	0.12	R-9	RAC	NO	NO	NO
14	45655000	0.21	R-9	RAC	NO	NO	NO
14	53780000	0.10	R-9	RAC	NO	NO	NO
14	53750000	0.23	R-9	RAC	NO	NO	NO
14	53770000	0.18	R-9	RAC	NO	NO	NO
14	45665000	0.10	R-9	RAC	NO	NO	NO
14	45697000	0.10	R-9	RAC	NO	NO	NO
14	45666000	0.10	R-9	RAC	NO	NO	NO
14	53760000	0.21	R-9	RAC	NO	NO	NO
14	45664000	0.10	R-9	RAC	NO	NO	NO

14	45663000	0.20	R-9	RAC	NO	NO	NO
14	52455000	0.11	R-9	RAC	NO	NO	NO
14	42840000	0.10	R-9	RAC	NO	NO	NO
14	52460000	0.12	R-9	RAC	NO	NO	NO
14	53890000	0.18	R-9	MU	NO	NO	NO
14	53900000	0.09	R-9	MU	NO	NO	NO
14	53910000	0.11	R-9	MU	NO	NO	NO
14	52980000	0.06	R-9	MU	YES	NO	YES
14	53010000	0.11	R-9	MU	NO	NO	NO
14	53960000	0.11	R-9	MU	NO	NO	NO
14	52720000	0.11	R-9	MU	NO	NO	NO
14	52985000	0.06	R-9	MU	NO	NO	NO
14	52730000	0.11	R-9	MU	NO	NO	NO
14	53000000	0.12	R-9	MU	NO	NO	NO
14	53965000	0.09	R-9	MU	NO	NO	NO
14	41730000	0.14	R-9	MU	NO	NO	NO
14	52750000	0.11	R-9	MU	NO	NO	NO
14	41725000	0.11	R-9	MU	NO	NO	NO
14	45658000	0.21	R-9	MU	NO	NO	NO
14	53980000	0.09	R-9	MU	NO	NO	NO
14	52740000	0.11	R-9	MU	NO	NO	NO
14	45676000	0.10	R-9	MU	NO	NO	NO
14	41720000	0.11	R-9	MU	NO	NO	NO
14	54050000	0.21	R-9	MU	NO	NO	NO
14	45682000	0.10	R-9	MU	NO	NO	NO
14	45683000	0.10	R-9	MU	NO	NO	NO
14	41710000	0.14	R-9	MU	NO	NO	NO
14	45675000	0.10	R-9	MU	NO	NO	NO
14	45686000	0.10	R-9	MU	NO	NO	NO
14	45689000	0.11	R-9	MU	NO	NO	NO
14	45657000	0.10	R-9	MU	NO	NO	NO
14	45671000	0.10	R-9	MU	NO	NO	NO
14	53190000	0.23	R-9	MSN	NO	NO	NO
14	52890000	0.12	R-9	MSN	NO	NO	NO
14	52900000	0.11	R-9	MSN	NO	NO	NO
14	52960000	0.12	R-9	MSN	NO	NO	NO
14	52630000	0.11	R-9	MSN	NO	NO	NO
14	52680000	0.11	R-9	MSN	NO	NO	NO
14	52950000	0.12	R-9	MSN	NO	NO	NO
14	52640000	0.11	R-9	MSN	NO	NO	NO
14	52910000	0.11	R-9	MSN	NO	NO	NO
14	52940000	0.12	R-9	MSN	NO	NO	NO
14	52430000	0.07	CX	RAC	YES	YES	NO
14	52760000	0.12	CX	MU	YES	YES	NO
14	52710000	0.12	CX	MU	YES	YES	NO
14	56830000	0.11	CX	RAC	YES	YES	NO
14	56840000	0.11	CX	RAC	YES	YES	NO
14	41060000	0.23	CX	RAC	YES	YES	NO
14	41090000	0.23	CX	RAC	YES	YES	NO
14	41115000	0.11	CX	RAC	YES	YES	NO
14	53580000	0.15	CC	RAC	YES	YES	NO
14	53240000	0.13	CC	RAC	YES	YES	NO
14	56820000	0.11	CC	RAC	YES	YES	NO
14	53640000	0.14	CC	RAC	YES	YES	NO

14	53660000	0.13 CC	RAC	YES	YES	NO
14	53650000	0.13 CC	RAC	YES	YES	NO
14	42590000	0.20 CC	RAC	YES	YES	NO
14	42560000	0.10 CC	RAC	YES	YES	NO
14	42550000	0.10 CC	RAC	YES	YES	NO
14	42600000	0.10 CC	RAC	YES	YES	NO
14	41820000	0.12 CC	RAC	YES	YES	NO
14	41760000	0.25 CC	MU	YES	YES	NO
14	41741000	0.14 CC	MU	YES	YES	NO
14	53670000	0.13 CC	RAC	YES	YES	NO
14	42500000	0.11 CC	RAC	YES	YES	NO
14	42570000	0.10 CC	RAC	YES	YES	NO
14	42540000	0.10 CC	RAC	YES	YES	NO
14	42530000	0.10 CC	RAC	YES	YES	NO
14	42520000	0.10 CC	RAC	YES	YES	NO
14	41830000	0.14 CC	RAC	YES	YES	NO
14	41750000	0.11 CC	MU	YES	YES	NO
14	45660000	0.17 CC	RAC	YES	YES	NO
14	45662000	0.09 CC	RAC	YES	YES	NO
14	52440000	0.05 CX	RAC	YES	YES	NO
14	52700000	0.12 CX	MU	YES	YES	NO
14	41000000	0.11 CX	RAC	YES	YES	NO
14	41080000	0.23 CX	RAC	YES	YES	NO
14	53570000	0.12 CC	RAC	YES	YES	NO
14	53275000	0.13 CC	RAC	YES	YES	NO
14	56821000	0.11 CC	RAC	YES	YES	NO
14	53075000	0.08 CX	RAC	YES	YES	NO
14	42650000	0.20 CC	RAC	YES	YES	NO
14	42640000	0.11 CC	RAC	YES	YES	NO
14	53645000	0.13 CC	RAC	YES	YES	NO
14	42680000	0.30 CC	RAC	YES	YES	NO
14	42580000	0.10 CC	RAC	YES	YES	NO
14	42610000	0.10 CC	RAC	YES	YES	NO
14	42620000	0.10 CC	RAC	YES	YES	NO
14	45681000	0.09 CC	RAC	YES	YES	NO
14	45669000	0.12 CC	RAC	YES	YES	NO
14	42770000	0.18 CC	RAC	YES	YES	NO
14	42760000	0.12 CC	RAC	YES	YES	NO
14	56910000	0.07 CX	RAC	YES	YES	NO
14	41910000	0.11 CC	RAC	YES	YES	NO
14	46950000	0.10 CX	RAC	YES	YES	NO
14	52830000	0.12 CX	RAC	YES	YES	NO
14	53070000	0.11 CX	RAC	YES	YES	NO
14	53050000	0.26 CX	RAC	YES	YES	NO
14	41790000	0.11 CC	RAC	YES	YES	NO
14	56930000	0.04 CX	RAC	YES	YES	NO
14	53040000	0.13 CX	RAC	YES	YES	NO
14	46570000	0.20 CX	RAC	YES	YES	NO
14	41127000	0.11 CX	RAC	YES	YES	NO
14	53550000	0.09 CC	RAC	YES	YES	NO
14	52450000	0.12 CX	RAC	YES	YES	NO
14	52770000	0.12 CX	MU	YES	YES	NO
14	41070000	0.23 CX	RAC	YES	YES	NO
14	41130000	0.12 CX	RAC	YES	YES	NO

14	41123000	0.12 CX	RAC	YES	YES	NO
14	56780000	0.22 CC	RAC	YES	YES	NO
14	53530000	0.08 CC	RAC	YES	YES	NO
14	53060000	0.19 CX	RAC	YES	YES	NO
14	53270000	0.25 CC	RAC	YES	YES	NO
14	53260000	0.25 CC	RAC	YES	YES	NO
14	42660000	0.10 CC	RAC	YES	YES	NO
14	42630000	0.10 CC	RAC	YES	YES	NO
14	42510000	0.10 CC	RAC	YES	YES	NO
14	41120000	0.11 CX	RAC	YES	YES	NO
14	53560000	0.12 CC	RAC	YES	YES	NO
14	53540000	0.08 CC	RAC	YES	YES	NO
14	52820000	0.14 CX	RAC	YES	YES	NO
14	52790000	0.09 CX	RAC	YES	YES	NO
14	52800000	0.08 CX	RAC	YES	YES	NO
14	41900000	0.11 CC	RAC	YES	YES	NO
14	52780000	0.22 CX	RAC	YES	YES	NO
14	41100000	0.23 CX	RAC	YES	YES	NO
14	41810000	0.23 CC	RAC	YES	YES	NO
14	46850000	0.59 CX	RAC	YES	YES	NO
14	41860000	0.69 CC	RAC	YES	YES	NO
14	56920000	0.05 CX	RAC	YES	YES	NO
14	41800000	0.11 CC	RAC	YES	YES	NO
14	56815000	0.19 CC	RAC	YES	YES	NO
14	56810000	0.19 CC	RAC	YES	YES	NO
14	45656000	0.22 CC	RAC	YES	YES	NO
14	45661000	0.11 CC	RAC	YES	YES	NO
14	56890000	0.92 CX	RAC	YES	YES	NO
14	53030000	0.25 CX	MU	YES	YES	NO
14	52970000	0.13 CX	MU	YES	YES	NO
14	986049408	0.12 CX	MU	YES	YES	NO
14	42750000	0.09 CC	RAC	YES	YES	NO
14	52810000	0.14 CX	RAC	YES	YES	NO
14	42740000	0.09 CC	RAC	YES	YES	NO
14	42720000	0.09 CC	RAC	YES	YES	NO
14	42730000	0.09 CC	RAC	YES	YES	NO
14	56800000	0.32 CC	RAC	YES	YES	NO
15	30710010	0.20 R-6	MU	YES	NO	YES
15	30720030	0.22 R-6	MU	YES	NO	YES
15	30532000	0.17 R-9	MSN	YES	NO	YES
15	30720040	0.10 R-6	MU	YES	NO	YES
15	30700010	0.14 R-6	MU	YES	NO	YES
15	30527000	0.17 R-9	MSN	YES	NO	YES
15	30533000	0.18 R-9	MSN	YES	NO	YES
15	30525000	0.46 R-9	MSN	YES	NO	YES
15	30519000	0.46 R-9	MSN	YES	NO	YES
15	30545000	0.55 R-9	MSN	YES	NO	YES
15	30720042	0.13 R-6	MU	YES	NO	YES
15	30522000	0.19 R-9	MSN	YES	NO	YES
15	30534000	0.22 R-9	MSN	YES	NO	YES
15	30730050	0.15 R-6	MU	YES	NO	YES
15	30521000	0.26 R-9	MSN	YES	NO	YES
15	30730060	0.18 R-6	MU	YES	NO	YES
15	30523000	0.14 R-9	MSN	YES	NO	YES

15	30523005	0.12	R-9	MSN	YES	NO	YES
15	30516000	0.24	R-9	MSN	NO	NO	NO
15	30508000	0.11	R-9	MSN	YES	NO	YES
15	30508005	0.11	R-9	MSN	NO	NO	NO
15	30507000	0.23	R-9	MSN	NO	NO	NO
15	30730090	0.18	R-6	LSN	NO	NO	NO
15	30740020	0.17	R-6	LSN	NO	NO	NO
15	30710030	0.11	R-6	LSN	NO	NO	NO
15	30720020	0.22	R-6	LSN	NO	NO	NO
15	30710040	0.09	R-6	LSN	NO	NO	NO
15	30720060	0.20	R-6	LSN	NO	NO	NO
15	30710020	0.20	R-6	LSN	NO	NO	NO
15	30720050	0.19	R-6	LSN	NO	NO	NO
15	30740010	0.16	R-6	LSN	NO	NO	NO
15	30720070	0.15	R-6	LSN	NO	NO	NO
15	30700050	0.11	R-6	LSN	NO	NO	NO
15	30730020	0.15	R-6	LSN	NO	NO	NO
15	30730080	0.16	R-6	LSN	NO	NO	NO
15	30710055	0.20	R-6	LSN	NO	NO	NO
15	30710070	0.24	R-6	LSN	NO	NO	NO
15	30730030	0.17	R-6	LSN	NO	NO	NO
15	30720010	0.26	R-6	LSN	NO	NO	NO
15	30730070	0.18	R-6	LSN	NO	NO	NO
15	30730040	0.20	R-6	LSN	NO	NO	NO
15	30700090	0.08	R-6	LSN	NO	NO	NO
15	30710080	0.18	R-6	LSN	NO	NO	NO
15	30700030	0.10	R-6	LSN	NO	NO	NO
15	30720090	0.16	R-6	LSN	NO	NO	NO
15	30700030	0.10	R-6	LSN	NO	NO	NO
15	30720090	0.16	R-6	LSN	NO	NO	NO
15	30700070	0.22	R-6	LSN	NO	NO	NO
15	30700040	0.10	R-6	LSN	NO	NO	NO
15	30700091	0.13	R-6	LSN	NO	NO	NO
15	30700085	0.15	R-6	LSN	NO	NO	NO
15	30700020	0.18	R-6	LSN	NO	NO	NO
15	30700080	0.05	R-6	LSN	NO	NO	NO
15	30506000	0.73	R-6	LSN	NO	NO	NO
15	30730010	0.71	R-6	LSN	NO	NO	NO
15	30700060	0.10	R-6	LSN	NO	NO	NO
15	30740062	1.39	R-6	MU	NO	NO	NO
15	986027930	0.07	R-9	LSN	NO	NO	NO
15	986027931	0.07	R-9	LSN	NO	NO	NO
15	30544000	3.26	Park	POS	NO	NO	NO
15	986027932	0.07	R-9	LSN	NO	NO	NO
15	986027929	0.09	R-9	LSN	NO	NO	NO
15	30583000	0.14	R-9	LSN	NO	NO	NO
15	30710090	0.13	R-6	LSN	NO	NO	NO
15	30720080	0.17	R-6	LSN	NO	NO	NO
15	986041544	0.20	R-9	LSN	NO	NO	NO
15	30579000	0.27	R-9	LSN	NO	NO	NO
15	986027928	0.09	R-9	LSN	NO	NO	NO
15	986027927	0.07	R-9	LSN	NO	NO	NO
15	100271290	0.88	R-22	MSN	YES	YES	NO
15	100271304	0.88	R-22	MSN	YES	YES	NO
15	100271296	0.88	R-22	MSN	YES	YES	NO
15	100271288	0.88	R-22	MSN	YES	YES	NO

15	100271302	0.88	R-22	MSN	YES	YES	NO
15	100271294	0.88	R-22	MSN	YES	YES	NO
15	100271298	0.88	R-22	MSN	YES	YES	NO
15	100271292	0.88	R-22	MSN	YES	YES	NO
15	100271286	0.88	R-22	MSN	YES	YES	NO
15	100271306	0.88	R-22	MSN	YES	YES	NO
15	100271300	0.88	R-22	MSN	YES	YES	NO
15	605206000	9.20	R-22	MHP	YES	YES	NO
15	603795000	9.20	R-22	MHP	YES	YES	NO
15	603279000	9.20	R-22	MHP	YES	YES	NO
15	603002000	9.20	R-22	MHP	YES	YES	NO
15	603404000	9.20	R-22	MHP	YES	YES	NO
15	603410000	9.20	R-22	MHP	YES	YES	NO
15	601078000	9.20	R-22	MHP	YES	YES	NO
15	601138000	9.20	R-22	MHP	YES	YES	NO
15	600591000	9.20	R-22	MHP	YES	YES	NO
15	600807000	9.20	R-22	MHP	YES	YES	NO
15	601876000	9.20	R-22	MHP	YES	YES	NO
15	601335000	9.20	R-22	MHP	YES	YES	NO
15	603886000	9.20	R-22	MHP	YES	YES	NO
15	602726000	9.20	R-22	MHP	YES	YES	NO
15	602686000	9.20	R-22	MHP	YES	YES	NO
15	603045000	9.20	R-22	MHP	YES	YES	NO
15	603105000	9.20	R-22	MHP	YES	YES	NO
15	600588000	9.20	R-22	MHP	YES	YES	NO
15	606303000	9.20	R-22	MHP	YES	YES	NO
15	604323000	9.20	R-22	MHP	YES	YES	NO
15	603693000	9.20	R-22	MHP	YES	YES	NO
15	604323000	9.20	R-22	MHP	YES	YES	NO
15	603693000	9.20	R-22	MHP	YES	YES	NO
15	601347000	9.20	R-22	MHP	YES	YES	NO
15	604078000	9.20	R-22	MHP	YES	YES	NO
15	601615000	9.20	R-22	MHP	YES	YES	NO
15	604038000	9.20	R-22	MHP	YES	YES	NO
15	604873000	9.20	R-22	MHP	YES	YES	NO
15	601994000	9.20	R-22	MHP	YES	YES	NO
15	611321000	9.20	R-22	MHP	YES	YES	NO
15	603473000	9.20	R-22	MHP	YES	YES	NO
15	600566000	9.20	R-22	MHP	YES	YES	NO
15	601022000	9.20	R-22	MHP	YES	YES	NO
15	986039507	9.20	R-22	MHP	YES	YES	NO
15	603556000	9.20	R-22	MHP	YES	YES	NO
15	605004000	9.20	R-22	MHP	YES	YES	NO
15	602159000	9.20	R-22	MHP	YES	YES	NO
15	604924000	9.20	R-22	MHP	YES	YES	NO
15	604411000	9.20	R-22	MHP	YES	YES	NO
15	603610000	9.20	R-22	MHP	YES	YES	NO
15	604806000	9.20	R-22	MHP	YES	YES	NO
15	603187000	9.20	R-22	MHP	YES	YES	NO
15	601257000	9.20	R-22	MHP	YES	YES	NO
15	600670000	9.20	R-22	MHP	YES	YES	NO
15	602480000	9.20	R-22	MHP	YES	YES	NO
15	603267000	9.20	R-22	MHP	YES	YES	NO
15	601012000	9.20	R-22	MHP	YES	YES	NO
15	604364000	9.20	R-22	MHP	YES	YES	NO
15	603255000	9.20	R-22	MHP	YES	YES	NO

15	601827000	9.20	R-22	MHP		YES	YES	NO
15	604093000	9.20	R-22	MHP		YES	YES	NO
15	604706000	9.20	R-22	MHP		YES	YES	NO
15	606904000	9.20	R-22	MHP		YES	YES	NO
15	603845000	9.20	R-22	MHP		YES	YES	NO
15	986037321	9.20	R-22	MHP		YES	YES	NO
15	601183000	9.20	R-22	MHP		YES	YES	NO
15	604418000	9.20	R-22	MHP		YES	YES	NO
15	603771000	9.20	R-22	MHP		YES	YES	NO
15	986027317	9.20	R-22	MHP		YES	YES	NO
15	601097000	9.20	R-22	MHP		YES	YES	NO
15	600835000	9.20	R-22	MHP		YES	YES	NO
15	601983000	9.20	R-22	MHP		YES	YES	NO
15	604041000	9.20	R-22	MHP		YES	YES	NO
15	602947000	9.20	R-22	MHP		YES	YES	NO
15	603403000	9.20	R-22	MHP		YES	YES	NO
15	603819000	9.20	R-22	MHP		YES	YES	NO
15	986027359	9.20	R-22	MHP		YES	YES	NO
15	600495000	9.20	R-22	MHP		YES	YES	NO
15	604155000	9.20	R-22	MHP		YES	YES	NO
15	611715000	9.20	R-22	MHP		YES	YES	NO
15	602285000	9.20	R-22	MHP		YES	YES	NO
15	603742000	9.20	R-22	MHP		YES	YES	NO
15	986051808	3.92	R-22		0	YES	YES	NO
15	30293000	0.14	CC	MU		YES	YES	NO
15	30264000	0.66	CC	MU		YES	YES	NO
15	30290000	0.17	R-18	MSN		YES	YES	NO
15	30300000	0.57	CC	MU		YES	YES	NO
15	30280000	0.20	R-18	MSN		YES	YES	NO
15	30261000	0.25	R-18	MSN		YES	YES	NO
15	30275000	0.17	R-18	MSN		YES	YES	NO
15	30276000	0.18	R-18	MSN		YES	YES	NO
15	30291000	0.23	R-18	MSN		YES	YES	NO
15	30302000	0.11	R-18	MSN		YES	YES	NO
15	30301000	0.15	R-18	MSN		YES	YES	NO
15	30200000	0.21	R-22	MSN		YES	YES	NO
15	30372000	0.22	R-22	MSN		YES	YES	NO
15	30385000	0.45	R-22	MSN		YES	YES	NO
15	30364000	0.14	R-22	MSN		YES	YES	NO
15	30390005	0.23	R-22	MSN		YES	YES	NO
15	30199000	0.19	R-22	MSN		YES	YES	NO
15	29337000	0.13	R-18	MSN		YES	YES	NO
15	29373117	0.13	R-18	MSN		YES	YES	NO
15	30295000	0.03	CC	MU		YES	YES	NO
15	30262000	0.15	R-18	MSN		YES	YES	NO
15	30201000	0.22	R-22	MSN		YES	YES	NO
15	30228000	0.35	R-22	MSN		YES	YES	NO
15	30310000	0.29	CC	MU		YES	YES	NO
15	30294000	0.17	CC	MU		YES	YES	NO
15	30263000	0.39	CC	MU		YES	YES	NO
15	30292000	0.16	R-18	MSN		YES	YES	NO
15	30281000	0.20	R-18	MSN		YES	YES	NO
15	30175000	0.19	R-22	MSN		YES	YES	NO
15	30311000	0.17	R-18	MSN		YES	YES	NO

15	30380000	0.22	R-22	MSN	YES	YES	NO
15	30390000	0.11	R-22	MSN	YES	YES	NO
15	30361000	0.03	R-22	MSN	YES	YES	NO
15	29373047	0.11	R-18	MSN	YES	YES	NO
15	29373052	0.20	R-18	MSN	YES	YES	NO
15	29373084	0.21	R-18	MSN	YES	YES	NO
15	29299000	0.53	R-18	MSN	YES	YES	NO
15	30366000	0.27	R-22	MSN	YES	YES	NO
15	29373043	0.11	R-18	MSN	YES	YES	NO
15	30340000	0.45	R-22	MSN	YES	YES	NO
15	30239028	0.36	R-22	MU	YES	YES	NO
15	30330000	0.40	R-22	MSN	YES	YES	NO
15	100271284	0.88	R-22	MSN	YES	YES	NO
15	29373046	0.12	R-18	MSN	YES	YES	NO
15	30220000	0.12	CC	MU	YES	YES	NO
15	30221000	0.15	R-22	MU	YES	YES	NO
15	30198000	0.30	R-22	MSN	YES	YES	NO
15	29373038	0.19	R-18	MSN	YES	YES	NO
15	30188000	3.83	R-22	MU	YES	YES	NO
15	29358000	0.14	R-18	MSN	YES	YES	NO
15	30171000	9.20	R-22	MHP	YES	YES	NO
15	30365000	0.17	R-22	MSN	YES	YES	NO
15	30360000	0.25	R-22	MSN	YES	YES	NO
15	30320000	0.94	R-22	MSN	YES	YES	NO
15	29373042	0.11	R-18	MSN	YES	YES	NO
15	30239033	0.25	R-22	MU	YES	YES	NO
15	29315000	0.34	R-18	MSN	YES	YES	NO
15	29298000	0.44	R-18	MSN	YES	YES	NO
15	30239030	0.36	R-22	MU	YES	YES	NO
15	30581000	0.06	CC	MU	YES	YES	NO
15	30586000	0.03	CC	MU	YES	YES	NO
15	30576000	0.47	CC	MU	YES	YES	NO
15	30570000	0.50	CC	MU	YES	YES	NO
15	30558000	0.44	CC	MU	YES	YES	NO
15	30568000	0.46	R-18	MSN	YES	YES	NO
15	30491000	0.28	R-18	MSN	YES	YES	NO
15	30499000	0.16	R-18	MSN	YES	YES	NO
15	30524000	0.87	R-18	MU	YES	YES	NO
15	30511000	1.15	R-18	MSN	YES	YES	NO
15	30531000	0.16	R-18	MSN	YES	YES	NO
15	30530000	0.16	R-18	MSN	YES	YES	NO
15	30495000	0.23	R-18	MSN	YES	YES	NO
15	30497000	0.25	R-18	MSN	YES	YES	NO
15	30584000	0.40	CC	MU	YES	YES	NO
15	30577000	0.55	CC	MU	YES	YES	NO
15	30560000	0.11	R-18	MSN	YES	YES	NO
15	30565000	0.24	R-18	MSN	YES	YES	NO
15	30567000	0.32	R-18	MSN	YES	YES	NO
15	30239025	0.41	CC	MU	YES	YES	NO
15	30582000	0.19	CC	MSN	YES	YES	NO
15	30556000	1.15	R-18	MSN	YES	YES	NO
15	30562000	0.10	CC	MSN	YES	YES	NO
15	30572000	0.40	R-18	MSN	YES	YES	NO
15	30573000	0.24	R-18	MSN	YES	YES	NO

15	30559000	0.47	R-18	MSN	YES	YES	NO
15	30563000	0.10	CC	MSN	YES	YES	NO
15	30546000	0.94	R-18	MSN	YES	YES	NO
15	30490000	1.23	R-18	MSN	YES	YES	NO
15	30498000	0.15	R-18	MSN	YES	YES	NO
15	29296015	0.23	R-18	MSN	YES	YES	NO
15	30239063	0.47	R-22	MU	YES	YES	NO
15	30557000	0.12	CC	MU	YES	YES	NO
15	29300000	0.89	R-18	MSN	YES	YES	NO
15	29373044	0.11	R-18	MSN	YES	YES	NO
15	29373045	0.11	R-18	MSN	YES	YES	NO
15	29373050	0.22	R-18	MSN	YES	YES	NO
15	30187000	3.92	R-22	MU	YES	YES	NO
16	39550000	0.22	CX	RAC	YES	YES	NO
16	46670000	0.23	CX	RAC	YES	YES	NO
16	51820000	0.27	CX	RAC	YES	YES	NO
16	51850000	0.23	CX	RAC	YES	YES	NO
16	51280000	0.92	CX	RAC	YES	YES	NO
16	51145000	0.09	CX	RAC	YES	YES	NO
16	51160000	0.11	CX	RAC	YES	YES	NO
16	46200000	0.12	CX	RAC	YES	YES	NO
16	51520000	0.11	CX	RAC	YES	YES	NO
16	46040000	0.12	CX	RAC	YES	YES	NO
16	47104000	0.55	CX	RAC	YES	YES	NO
16	51885000	0.05	CX	RAC	YES	YES	NO
16	51890000	0.10	CX	RAC	YES	YES	NO
16	51860000	0.17	CX	RAC	YES	YES	NO
16	47285000	0.09	CX	RAC	YES	YES	NO
16	46920000	0.09	CX	RAC	YES	YES	NO
16	47080000	0.95	CX	RAC	YES	YES	NO
16	47274000	0.11	CX	RAC	YES	YES	NO
16	51490000	0.12	CX	RAC	YES	YES	NO
16	51500000	0.12	CX	RAC	YES	YES	NO
16	46140000	0.41	CX	RAC	YES	YES	NO
16	46100000	0.11	CX	RAC	YES	YES	NO
16	51880000	0.05	CX	RAC	YES	YES	NO
16	47288000	0.04	CX	RAC	YES	YES	NO
16	51140000	0.16	CX	RAC	YES	YES	NO
16	46050000	0.29	CX	RAC	YES	YES	NO
16	51965000	0.10	CX	RAC	YES	YES	NO
16	52100000	0.22	CX	RAC	YES	YES	NO
16	51150000	0.12	CX	RAC	YES	YES	NO
16	52180000	0.41	CX	RAC	YES	YES	NO
16	52470000	0.46	CX	RAC	YES	YES	NO
16	47293000	0.23	CX	RAC	YES	YES	NO
16	46210000	0.25	CX	RAC	YES	YES	NO
16	51130000	0.12	CX	RAC	YES	YES	NO
16	51980000	0.10	CX	RAC	YES	YES	NO
16	47308000	0.21	CX	RAC	YES	YES	NO
16	51310000	0.12	CX	RAC	YES	YES	NO
16	51895000	0.08	CX	RAC	YES	YES	NO
16	52090000	0.22	CX	RAC	YES	YES	NO
16	51970000	0.06	CX	RAC	YES	YES	NO
16	46990000	0.14	CX	RAC	YES	YES	NO

16	47251000	0.08 CX	RAC	YES	YES	NO
16	51997000	0.27 CX	RAC	YES	YES	NO
16	46075000	0.10 CX	RAC	YES	YES	NO
16	51320000	0.13 CX	RAC	YES	YES	NO
16	47278000	0.14 CX	RAC	YES	YES	NO
16	47268000	0.26 CX	RAC	YES	YES	NO
16	51971000	0.13 CX	RAC	YES	YES	NO
16	46080000	0.06 CX	RAC	YES	YES	NO
16	46290000	0.69 CX	RAC	YES	YES	NO
16	47230000	0.19 CX	RAC	YES	YES	NO
16	51908000	0.05 CX	RAC	YES	YES	NO
16	51905000	0.07 CX	RAC	YES	YES	NO
16	51910000	0.06 CX	RAC	YES	YES	NO
16	47301000	0.14 CX	RAC	YES	YES	NO
16	39331000	0.52 CX	RAC	YES	YES	NO
16	46980000	0.15 CX	RAC	YES	YES	NO
16	46350000	0.29 CX	RAC	YES	YES	NO
16	51300000	0.25 CX	RAC	YES	YES	NO
16	51290000	0.25 CX	RAC	YES	YES	NO
16	46360000	0.17 CX	RAC	YES	YES	NO
16	51590000	0.23 CX	RAC	YES	YES	NO
16	51120000	0.13 CX	RAC	YES	YES	NO
16	51780000	0.23 CX	RAC	YES	YES	NO
16	51600000	0.69 CX	RAC	YES	YES	NO
16	47170000	0.51 CX	RAC	YES	YES	NO
16	47101000	0.17 CX	RAC	YES	YES	NO
16	51830000	0.23 CX	RAC	YES	YES	NO
16	51510000	0.11 CX	RAC	YES	YES	NO
16	52040000	0.61 CX	RAC	YES	YES	NO
16	52205000	1.08 CX	RAC	YES	YES	NO
16	51720000	0.23 CX	RAC	YES	YES	NO
16	986030019	0.14 CX	RAC	YES	YES	NO
16	986030020	0.09 CX	RAC	YES	YES	NO
16	51550000	0.23 CX	RAC	YES	YES	NO
16	986031020	0.23 CX	RAC	YES	YES	NO
16	51840000	0.23 CX	RAC	YES	YES	NO
16	51930000	0.26 CX	RAC	YES	YES	NO
16	52230000	0.74 CX	RAC	YES	YES	NO
16	46320000	0.27 CX	RAC	YES	YES	NO
16	51750000	0.46 CX	RAC	YES	YES	NO
16	47281000	0.22 CX	RAC	YES	YES	NO
16	51227000	0.13 CX	RAC	YES	YES	NO
16	51224000	0.10 CX	RAC	YES	YES	NO
16	51580000	1.08 CX	RAC	YES	YES	NO
16	51960000	0.10 CX	RAC	YES	YES	NO
17	29847000	0.15 R-9	LSN	YES	NO	YES
17	29790000	0.12 R-9	LSN	NO	NO	NO
17	29816000	0.17 R-9	LSN	YES	NO	YES
17	29825000	0.12 R-9	LSN	NO	NO	NO
17	29821000	0.14 R-9	LSN	YES	NO	YES
17	29819000	0.11 R-9	LSN	NO	NO	NO
17	30167100	0.13 R-9	LSN	NO	NO	NO
17	29830000	0.12 R-9	LSN	NO	NO	NO
17	29833000	0.12 R-9	LSN	NO	NO	NO

17	29818000	0.12 R-9	LSN	NO	NO	NO
17	29803000	0.11 R-9	LSN	NO	NO	NO
17	29827000	0.12 R-9	LSN	NO	NO	NO
17	30167110	0.13 R-9	LSN	NO	NO	NO
17	29828000	0.13 R-9	LSN	NO	NO	NO
17	29832000	0.12 R-9	LSN	NO	NO	NO
17	29817000	0.12 R-9	LSN	NO	NO	NO
17	30167070	0.13 R-9	LSN	NO	NO	NO
17	30167060	0.13 R-9	LSN	YES	NO	YES
17	29892000	0.13 R-9	LSN	YES	NO	YES
17	29869000	0.25 R-9	LSN	YES	NO	YES
17	29814000	0.11 R-9	LSN	NO	NO	NO
17	29823000	0.11 R-9	LSN	NO	NO	NO
17	29822000	0.11 R-9	LSN	NO	NO	NO
17	29820000	0.11 R-9	LSN	NO	NO	NO
17	30167120	0.13 R-9	LSN	NO	NO	NO
17	29829000	0.12 R-9	LSN	NO	NO	NO
17	29831000	0.11 R-9	LSN	NO	NO	NO
17	29834000	0.14 R-9	LSN	YES	NO	YES
17	30167050	0.14 R-9	LSN	YES	NO	YES
17	29921000	0.20 R-9	LSN	YES	NO	YES
17	29870000	0.13 R-9	LSN	NO	NO	NO
17	29791000	0.17 R-9	LSN	YES	NO	YES
17	29813000	0.14 R-9	LSN	YES	NO	YES
17	29815000	0.11 R-9	LSN	NO	NO	NO
17	29812000	0.12 R-9	LSN	NO	NO	NO
17	29811000	0.12 R-9	LSN	NO	NO	NO
17	29810000	0.18 R-9	LSN	YES	NO	YES
17	29801000	0.12 R-9	LSN	NO	NO	NO
17	29802000	0.11 R-9	LSN	NO	NO	NO
17	29826000	0.11 R-9	LSN	NO	NO	NO
17	29824000	0.11 R-9	LSN	NO	NO	NO
17	30167090	0.14 R-9	LSN	YES	NO	YES
17	29872000	0.15 R-9	LSN	YES	NO	YES
17	29276120	0.12 R-9	LSN	NO	NO	NO
17	29276090	0.12 R-9	LSN	NO	NO	NO
17	29276188	0.13 R-9	LSN	NO	NO	NO
17	29276142	0.11 R-9	LSN	NO	NO	NO
17	29276172	0.14 R-9	LSN	YES	NO	YES
17	29276144	0.12 R-9	LSN	NO	NO	NO
17	29276122	0.11 R-9	LSN	NO	NO	NO
17	29276094	0.12 R-9	LSN	NO	NO	NO
17	29276186	0.15 R-9	LSN	YES	NO	YES
17	29276170	0.13 R-9	LSN	NO	NO	NO
17	29275750	0.12 R-9	LSN	NO	NO	NO
17	29275760	0.13 R-9	LSN	NO	NO	NO
17	29276124	0.11 R-9	LSN	NO	NO	NO
17	29276092	0.13 R-9	LSN	NO	NO	NO
17	29276140	0.11 R-9	LSN	NO	NO	NO
17	29276066	0.11 R-9	LSN	NO	NO	NO
17	29276068	0.12 R-9	LSN	NO	NO	NO
17	29275890	0.12 R-9	LSN	NO	NO	NO
17	29276038	0.13 R-9	LSN	NO	NO	NO
17	29276040	0.13 R-9	LSN	NO	NO	NO

17	29276048	0.12 R-9	LSN	NO	NO	NO
17	29276104	0.13 R-9	LSN	NO	NO	NO
17	29276098	0.12 R-9	LSN	NO	NO	NO
17	29276096	0.13 R-9	LSN	NO	NO	NO
17	29276080	0.13 R-9	LSN	NO	NO	NO
17	29276174	0.13 R-9	LSN	NO	NO	NO
17	29276176	0.17 R-9	LSN	YES	NO	YES
17	29275770	0.13 R-9	LSN	YES	NO	YES
17	29276036	0.13 R-9	LSN	NO	NO	NO
17	29276062	0.11 R-9	LSN	NO	NO	NO
17	29276064	0.11 R-9	LSN	NO	NO	NO
17	29276050	0.12 R-9	LSN	NO	NO	NO
17	29276052	0.12 R-9	LSN	NO	NO	NO
17	29276072	0.12 R-9	LSN	NO	NO	NO
17	29276100	0.13 R-9	LSN	YES	NO	YES
17	29276084	0.12 R-9	LSN	NO	NO	NO
17	29276126	0.11 R-9	LSN	NO	NO	NO
17	29276156	0.11 R-9	LSN	NO	NO	NO
17	29276154	0.11 R-9	LSN	NO	NO	NO
17	29275880	0.11 R-9	LSN	NO	NO	NO
17	29276042	0.12 R-9	LSN	NO	NO	NO
17	29276046	0.12 R-9	LSN	NO	NO	NO
17	29276044	0.12 R-9	LSN	NO	NO	NO
17	29276070	0.12 R-9	LSN	NO	NO	NO
17	29276102	0.12 R-9	LSN	NO	NO	NO
17	29276082	0.12 R-9	LSN	NO	NO	NO
17	29276086	0.12 R-9	LSN	NO	NO	NO
17	29276114	0.12 R-9	LSN	NO	NO	NO
17	29276088	0.11 R-9	LSN	NO	NO	NO
17	29276180	0.11 R-9	LSN	NO	NO	NO
17	29276158	0.11 R-9	LSN	NO	NO	NO
17	29275710	0.13 R-9	LSN	NO	NO	NO
17	29275800	0.13 R-9	LSN	YES	NO	YES
17	29275790	0.13 R-9	LSN	YES	NO	YES
17	29275780	0.13 R-9	LSN	YES	NO	YES
17	29276056	0.12 R-9	LSN	NO	NO	NO
17	29276058	0.12 R-9	LSN	NO	NO	NO
17	29276060	0.11 R-9	LSN	NO	NO	NO
17	29276054	0.12 R-9	LSN	NO	NO	NO
17	29276078	0.12 R-9	LSN	NO	NO	NO
17	29276076	0.12 R-9	LSN	NO	NO	NO
17	29276074	0.12 R-9	LSN	NO	NO	NO
17	29276108	0.12 R-9	LSN	NO	NO	NO
17	29276110	0.12 R-9	LSN	NO	NO	NO
17	29276106	0.13 R-9	LSN	NO	NO	NO
17	29276112	0.12 R-9	LSN	NO	NO	NO
17	29276160	0.11 R-9	LSN	NO	NO	NO
17	29276152	0.10 R-9	LSN	NO	NO	NO
17	29276182	0.12 R-9	LSN	NO	NO	NO
17	29276138	0.15 R-9	LSN	YES	NO	YES
17	986055446	1.37 CC	MU	YES	YES	NO
17	29835000	1.37 CC	MU	YES	YES	NO
17	30167040	0.13 CC	MU	YES	YES	NO
17	29838000	0.16 CC	MU	YES	YES	NO

17	29920000	0.53 CC	MU	YES	YES	NO
17	30167030	0.14 CC	MU	YES	YES	NO
17	30167010	0.11 CC	MU	YES	YES	NO
17	30167015	0.54 CC	MU	YES	YES	NO
17	29757000	0.11 CC	MU	YES	YES	NO
17	30167025	0.20 CC	MU	YES	YES	NO
17	29871000	0.57 CC	MU	YES	YES	NO
17	30167020	0.24 CC	MU	YES	YES	NO
17	29889000	0.23 CC	MU	YES	YES	NO
17	29276148	0.11 CC	MU	YES	YES	NO
17	29276162	0.14 CC	MU	YES	YES	NO
17	29863000	0.35 CC	MU	YES	YES	NO
17	29865000	0.77 CC	MU	YES	YES	NO
17	29747001	0.21 R-18	MSN	YES	YES	NO
17	30750020	0.16 R-18	MSN	YES	YES	NO
17	30750022	0.14 R-18	MSN	YES	YES	NO
17	29276166	0.11 CC	MU	YES	YES	NO
17	29276168	0.13 CC	MU	YES	YES	NO
17	29276164	0.15 CC	MU	YES	YES	NO
17	29877000	0.08 CC	MU	YES	YES	NO
17	29758000	0.10 CC	MU	YES	YES	NO
17	29747004	0.20 R-18	MSN	YES	YES	NO
17	29904000	0.13 CC	MU	YES	YES	NO
17	29916000	0.10 CC	MU	YES	YES	NO
17	29759000	0.67 CC	MU	YES	YES	NO
17	29903000	0.03 CC	MU	YES	YES	NO
17	30750012	0.13 R-18	MSN	YES	YES	NO
17	29762000	0.26 CC	MU	YES	YES	NO
17	29276146	0.12 CC	MU	YES	YES	NO
17	29917000	0.43 CC	MU	YES	YES	NO
17	30750006	0.13 R-18	MSN	YES	YES	NO
17	30750010	0.13 R-18	MSN	YES	YES	NO
17	30750014	0.13 R-18	MSN	YES	YES	NO
17	30750016	0.13 R-18	MSN	YES	YES	NO
17	30750024	0.13 R-18	MSN	YES	YES	NO
17	29763000	2.52 CC	MU	YES	YES	NO
17	29756000	0.12 CC	MU	YES	YES	NO
17	29751010	0.11 R-18	MU	YES	YES	NO
17	29749000	0.21 R-18	MU	YES	YES	NO
17	29750000	0.21 R-18	MU	YES	YES	NO
17	29276178	0.29 CC	MU	YES	YES	NO
17	29747002	0.19 R-18	MSN	YES	YES	NO
17	30750008	0.13 R-18	MSN	YES	YES	NO
17	30750018	0.13 R-18	MSN	YES	YES	NO
17	29747003	0.21 R-18	MSN	YES	YES	NO
17	29751000	0.10 R-18	MU	YES	YES	NO
17	29720000	0.53 CC	MU	YES	YES	NO
17	29276190	0.20 CC	MU	YES	YES	NO
17	29276184	0.17 CC	MU	YES	YES	NO
17	29887000	0.19 CC	MU	YES	YES	NO
17	29885000	0.21 CC	MU	YES	YES	NO
17	29850000	0.19 CC	MU	YES	YES	NO
17	29899000	0.49 CC	MU	YES	YES	NO
17	29888000	0.19 CC	MU	YES	YES	NO

17	29893000	0.57	CC	MU	YES	YES	NO
17	29881000	0.67	CC	MU	YES	YES	NO
17	29748000	0.21	R-18	MU	YES	YES	NO
17	29835001	0.34	CC	MU	YES	YES	NO
17	29276150	0.78	CC	MU	YES	YES	NO
17	29844000	1.56	CC	MU	YES	YES	NO
17	29775000	0.10	R-18	MU	YES	YES	NO
17	29779012	0.20	R-18	MSN	YES	YES	NO
17	29779008	0.15	R-18	MSN	YES	YES	NO
17	29747043	0.11	R-18	MU	YES	YES	NO
17	29747042	0.13	R-18	MU	YES	YES	NO
17	29779004	0.20	R-18	MSN	YES	YES	NO
17	29779010	0.15	R-18	MSN	YES	YES	NO
17	29779016	0.15	R-18	MSN	YES	YES	NO
17	29747044	0.13	R-18	MU	YES	YES	NO
17	29776000	0.23	CN	MU	YES	YES	NO
17	29779002	0.15	R-18	MSN	YES	YES	NO
17	29779014	0.20	R-18	MSN	YES	YES	NO
17	29886000	0.19	CC	MU	YES	YES	NO
17	29775010	0.10	CN	MU	YES	YES	NO
17	29779006	0.20	R-18	MSN	YES	YES	NO
17	29721000	4.71	CC	MU	YES	YES	NO
17	986031710	0.56	CC	MU	YES	YES	NO
18	24040000	0.15	CC	MU	YES	YES	NO
18	38279925	3.24	CPX	IC	YES	YES	NO
18	29918000	0.03	R-30	MU	YES	YES	NO
18	38279928	0.46	CPX	MU	YES	YES	NO
18	38279936	3.38	CPX	IC	YES	YES	NO
19	29860000	0.27	R-9	MU	YES	NO	YES
19	29891000	1.35	R-9	MU	YES	NO	YES
19	23820000	0.12	R-9	LSN	NO	NO	NO
19	23780000	0.11	R-9	LSN	NO	NO	NO
19	29781000	0.15	R-9	LSN	NO	NO	NO
19	29784000	0.12	R-9	LSN	NO	NO	NO
19	23860000	0.11	R-9	LSN	NO	NO	NO
19	23855000	0.11	R-9	LSN	NO	NO	NO
19	29794000	0.11	R-9	LSN	NO	NO	NO
19	29798000	0.11	R-9	LSN	NO	NO	NO
19	23843000	0.11	R-9	LSN	NO	NO	NO
19	29908000	0.12	R-9	LSN	NO	NO	NO
19	29912000	0.24	R-9	LSN	YES	NO	YES
19	23870000	0.17	R-9	LSN	NO	NO	NO
19	23850000	0.12	R-9	LSN	NO	NO	NO
19	23566000	0.24	R-9	LSN	NO	NO	NO
19	23569000	0.12	R-9	LSN	NO	NO	NO
19	23610000	0.11	R-9	LSN	NO	NO	NO
19	23585000	0.11	R-9	LSN	NO	NO	NO
19	29782000	0.15	R-9	LSN	NO	NO	NO
19	23620000	0.11	R-9	LSN	NO	NO	NO
19	23630000	0.17	R-9	LSN	NO	NO	NO
19	23790000	0.23	R-9	LSN	NO	NO	NO
19	23775000	0.11	R-9	LSN	NO	NO	NO
19	29793000	0.12	R-9	LSN	NO	NO	NO
19	29795000	0.11	R-9	LSN	NO	NO	NO

19	29796000	0.12	R-9	LSN	NO	NO	NO
19	23835000	0.11	R-9	LSN	NO	NO	NO
19	23840000	0.11	R-9	LSN	NO	NO	NO
19	23847000	0.11	R-9	LSN	NO	NO	NO
19	29841000	0.21	R-9	LSN	NO	NO	NO
19	29900000	0.11	R-9	LSN	NO	NO	NO
19	29907000	0.18	R-9	LSN	NO	NO	NO
19	30167080	0.14	R-9	LSN	NO	NO	NO
19	23600000	0.11	R-9	LSN	NO	NO	NO
19	29780000	0.14	R-9	LSN	NO	NO	NO
19	23635000	0.18	R-9	LSN	NO	NO	NO
19	29783000	0.12	R-9	LSN	NO	NO	NO
19	23770000	0.13	R-9	LSN	NO	NO	NO
19	29792000	0.11	R-9	LSN	NO	NO	NO
19	29797000	0.11	R-9	LSN	NO	NO	NO
19	23848000	0.12	R-9	LSN	NO	NO	NO
19	30167130	0.15	R-9	LSN	NO	NO	NO
19	23830000	0.11	R-9	LSN	NO	NO	NO
19	23590000	0.11	R-9	LSN	NO	NO	NO
19	23625000	0.24	R-9	LSN	NO	NO	NO
19	986035242	0.11	R-9	LSN	NO	NO	NO
19	23500000	0.12	CC	MU	YES	YES	NO
19	23320000	0.07	CC	MU	YES	YES	NO
19	23274000	0.11	CC	MU	YES	YES	NO
19	23510000	0.23	CC	MU	YES	YES	NO
19	23721000	0.11	R-30	MSN	YES	YES	NO
19	23720000	0.11	R-30	MSN	YES	YES	NO
19	23350000	0.10	CC	MU	YES	YES	NO
19	23720000	0.11	R-30	MSN	YES	YES	NO
19	23350000	0.10	CC	MU	YES	YES	NO
19	23340000	0.09	CC	MU	YES	YES	NO
19	23750000	0.13	R-30	MSN	YES	YES	NO
19	23755000	0.10	R-30	MSN	YES	YES	NO
19	23160000	0.13	CC	MU	YES	YES	NO
19	23680000	0.12	R-30	MSN	YES	YES	NO
19	23950000	0.12	CC	MU	YES	YES	NO
19	23930000	0.10	CC	MU	YES	YES	NO
19	23940000	0.09	CC	MU	YES	YES	NO
19	24010000	0.12	CC	MU	YES	YES	NO
19	24060000	0.38	CPX	MU	YES	YES	NO
19	24070000	0.15	CPX	MU	YES	YES	NO
19	24050001	0.09	CPX	MU	YES	YES	NO
19	23955000	0.12	CC	MU	YES	YES	NO
19	24007000	0.18	CC	MU	YES	YES	NO
19	24020000	0.09	CC	MU	YES	YES	NO
19	24052000	0.16	CPX	MU	YES	YES	NO
19	38279912	6.09	CPX	POS	YES	YES	NO
19	24051000	0.11	CPX	MU	YES	YES	NO
19	24080000	0.04	CPX	MU	YES	YES	NO
19	23330000	0.08	CC	MU	YES	YES	NO
19	23640000	0.22	CC	MU	YES	YES	NO
19	23151000	1.84	R-30	MSN	YES	YES	NO
19	23730000	0.23	R-30	MSN	YES	YES	NO
19	23135000	0.61	R-30	MSN	YES	YES	NO
19	23760000	0.23	R-30	MSN	YES	YES	NO
19	23865000	0.70	CC	MU	YES	YES	NO

19	23920000	0.32	CC	MU	YES	YES	NO
19	24036000	0.06	CC	MU	YES	YES	NO
19	24025000	0.09	CC	MU	YES	YES	NO
19	24081000	0.03	CPX	MU	YES	YES	NO
19	24050000	0.03	CPX	MU	YES	YES	NO
19	23490000	0.12	CC	MU	YES	YES	NO
19	23495000	0.11	CC	MU	YES	YES	NO
19	23360000	0.10	CC	MU	YES	YES	NO
19	23690000	0.12	R-30	MSN	YES	YES	NO
19	23700000	0.12	R-30	MSN	YES	YES	NO
19	23710000	0.11	R-30	MSN	YES	YES	NO
19	23740000	0.12	R-30	MSN	YES	YES	NO
19	23970000	0.21	CC	MU	YES	YES	NO
19	24029000	0.08	CC	MU	YES	YES	NO
19	23660000	0.17	CC	MU	YES	YES	NO
19	23650000	0.17	CC	MU	YES	YES	NO
19	23670000	0.12	R-30	MSN	YES	YES	NO
19	29843000	5.53	CPX	POS	YES	YES	NO
19	23132000	0.12	R-30	MSN	YES	YES	NO
19	29848000	0.44	R-30	MSN	YES	YES	NO
19	23155000	5.51	R-30	MSN	YES	YES	NO
19	23279000	0.19	R-30	MSN	YES	YES	NO
19	23180000	0.12	R-30	MSN	YES	YES	NO
19	24003000	0.93	R-30	MSN	YES	YES	NO
19	23220000	0.22	R-30	MSN	YES	YES	NO
19	23665000	0.14	R-30	MSN	YES	YES	NO
19	23281000	0.15	R-30	MSN	YES	YES	NO
19	23271000	0.22	R-30	MSN	YES	YES	NO
19	23282000	0.15	R-30	MSN	YES	YES	NO
19	23210000	0.39	R-30	MSN	YES	YES	NO
19	23200000	0.19	R-30	MSN	YES	YES	NO
19	23283000	0.12	R-30	MSN	YES	YES	NO
19	23277000	0.19	R-30	MSN	YES	YES	NO
19	23272000	0.32	R-30	MSN	YES	YES	NO
19	23190000	0.12	R-30	MSN	YES	YES	NO
19	24100000	0.13	CC	MU	YES	YES	NO
19	24105000	0.07	CC	MU	YES	YES	NO
19	24090000	0.11	CC	MU	YES	YES	NO
19	29840000	9.13	CPX	POS	YES	YES	NO
19	24085000	0.06	CC	MU	YES	YES	NO
20	30250020	0.31	R-4	MSN	YES	NO	YES
20	30250030	0.31	R-4	MSN	YES	NO	YES
20	30250480	0.20	R-4	MSN	YES	NO	YES
20	30250470	0.19	R-4	MSN	YES	NO	YES
20	30251010	0.18	R-4	MSN	YES	NO	YES
20	30250460	0.19	R-4	MSN	YES	NO	YES
20	30251030	0.17	R-4	MSN	YES	NO	YES
20	30251040	0.23	R-4	MSN	YES	NO	YES
20	30251020	0.16	R-4	MSN	YES	NO	YES
20	30250520	0.16	R-4	MSN	YES	NO	YES
20	30250450	0.21	R-4	MSN	YES	NO	YES
20	30251050	0.22	R-4	MSN	YES	NO	YES
20	30250510	0.15	R-4	MSN	YES	NO	YES
20	30250440	0.22	R-4	MSN	YES	NO	YES

20	30250500	0.16	R-4	MSN	YES	NO	YES
20	30250810	0.16	R-4	MSN	YES	NO	YES
20	30250820	0.15	R-4	MSN	NO	NO	NO
20	30250830	0.15	R-4	MSN	NO	NO	NO
20	30250490	0.16	R-4	MSN	NO	NO	NO
20	30250800	0.15	R-4	MSN	NO	NO	NO
20	30250320	0.22	IL	RAC	NO	NO	NO
20	30241015	0.30	IL	RAC	NO	NO	NO
20	30250330	0.21	IL	RAC	NO	NO	NO
20	30250995	1.33	IL	RAC	NO	NO	NO
20	30250998	0.86	IL	RAC	NO	NO	NO
20	30238000	3.16	IL	RAC	NO	NO	NO
20	30250310	2.96	IL	RAC	NO	NO	NO
20	30242047	13.13	CG	RAC	YES	YES	NO
20	30250990	0.94	CC	RAC	YES	YES	NO
20	30250010	0.30	CC	RAC	YES	YES	NO
20	30239050	0.94	CC	RAC	YES	YES	NO
20	30250290	1.13	CC	RAC	YES	YES	NO
20	30250996	0.34	CC	RAC	YES	YES	NO
20	30243024	3.00	R-18	MU	YES	YES	NO
20	30242046	1.20	R-22	MU	YES	YES	NO
20	30244000	2.43	CC	RAC	YES	YES	NO
20	30239059	0.44	CG	RAC	YES	YES	NO
20	30239055	5.05	CG	MU	YES	YES	NO
20	30242020	0.99	CG	RAC	YES	YES	NO
20	30242045	13.13	CG	RAC	YES	YES	NO
20	30242044	0.50	CG	RAC	YES	YES	NO
20	30239056	0.62	CG	RAC	YES	YES	NO
20	30242043	0.37	CG	RAC	YES	YES	NO
20	30242010	0.50	CG	RAC	YES	YES	NO
20	30242030	9.40	R-22	MU	YES	YES	NO
21	110538300	0.22	R-6	MSN	YES	NO	YES
21	110538288	0.19	R-6	MSN	YES	NO	YES
21	110538028	0.17	R-6	MSN	YES	NO	YES
21	110538030	0.17	R-6	MSN	YES	NO	YES
21	110538298	0.22	R-6	MSN	YES	NO	YES
21	110538296	0.21	R-6	MSN	YES	NO	YES
21	110538294	0.24	R-6	MSN	YES	NO	YES
21	110538292	0.21	R-6	MSN	NO	NO	NO
21	110538290	0.22	R-6	MSN	NO	NO	NO
21	110299422	0.14	R-9	MSN	NO	NO	NO
21	110299416	0.20	R-9	MSN	NO	NO	NO
21	110299424	0.14	R-9	MSN	NO	NO	NO
21	110299412	0.19	R-9	MSN	NO	NO	NO
21	110299464	0.14	R-9	MSN	NO	NO	NO
21	110538024	0.19	R-6	MSN	NO	NO	NO
21	110299462	0.14	R-9	MSN	NO	NO	NO
21	110299420	0.14	R-9	MSN	NO	NO	NO
21	110299410	0.17	R-9	MSN	NO	NO	NO
21	110299460	0.14	R-9	MSN	NO	NO	NO
21	110299426	0.14	R-9	MSN	NO	NO	NO
21	110299418	0.14	R-9	MSN	NO	NO	NO
21	110538280	0.20	R-6	MSN	NO	NO	NO
21	110299458	0.14	R-9	MSN	NO	NO	NO

21	110538094	0.20	R-6	MSN	NO	NO	NO
21	110299408	0.17	R-9	MSN	NO	NO	NO
21	110538026	0.18	R-6	MSN	NO	NO	NO
21	110538096	0.19	R-6	MSN	NO	NO	NO
21	110299456	0.14	R-9	MSN	NO	NO	NO
21	110538098	0.19	R-6	MSN	NO	NO	NO
21	110538100	0.18	R-6	MSN	NO	NO	NO
21	110538102	0.22	R-6	MSN	NO	NO	NO
21	110538092	0.18	R-6	MSN	NO	NO	NO
21	110538090	0.17	R-6	MSN	NO	NO	NO
21	986027047	4.51	CC	MU	YES	YES	NO
21	167670000	4.51	CC	MU	YES	YES	NO
21	167672001	3.41	CC	MU	YES	YES	NO
21	110299950	0.55	CC	MU	YES	YES	NO
21	110531048	0.05	R-22	MSN	YES	YES	NO
21	110531050	0.05	R-22	MSN	YES	YES	NO
21	110531060	0.05	R-22	MSN	YES	YES	NO
21	110531070	0.06	R-22	MSN	YES	YES	NO
21	110531164	0.04	R-22	MSN	YES	YES	NO
21	110531036	0.05	R-22	MSN	YES	YES	NO
21	110531058	0.05	R-22	MSN	YES	YES	NO
21	110531066	0.05	R-22	MSN	YES	YES	NO
21	110531158	0.04	R-22	MSN	YES	YES	NO
21	110531162	0.04	R-22	MSN	YES	YES	NO
21	110531040	0.04	R-22	MSN	YES	YES	NO
21	167668000	0.57	CC	MU	YES	YES	NO
21	110531156	0.04	R-22	MSN	YES	YES	NO
21	110531038	0.05	R-22	MSN	YES	YES	NO
21	110531056	0.06	R-22	MSN	YES	YES	NO
21	110531062	0.05	R-22	MSN	YES	YES	NO
21	110531064	0.05	R-22	MSN	YES	YES	NO
21	110531068	0.05	R-22	MSN	YES	YES	NO
21	110531140	0.04	R-22	MSN	YES	YES	NO
21	110531154	0.04	R-22	MSN	YES	YES	NO
21	110531160	0.04	R-22	MSN	YES	YES	NO
21	167630000	0.92	CC	MU	YES	YES	NO
21	110531052	0.05	R-22	MSN	YES	YES	NO
21	110531054	0.06	R-22	MSN	YES	YES	NO
21	110531046	0.05	R-22	MSN	YES	YES	NO
21	110531146	0.04	R-22	MSN	YES	YES	NO
21	110531148	0.04	R-22	MSN	YES	YES	NO
21	167685000	0.64	CC	MU	YES	YES	NO
21	167683000	0.33	CC	MU	YES	YES	NO
21	110531142	0.04	R-22	MSN	YES	YES	NO
21	167630020	1.95	CC	MU	YES	YES	NO
21	167630010	0.80	CC	MU	YES	YES	NO
21	167630025	1.29	CC	MU	YES	YES	NO
21	167665000	0.70	CC	MU	YES	YES	NO
21	167631000	4.51	CC	MU	YES	YES	NO
21	110299952	0.56	CC	MU	YES	YES	NO
21	986058875	0.30	CC	MU	YES	YES	NO
21	167630015	1.16	CC	MU	YES	YES	NO
21	164700000	2.84	CC	MU	YES	YES	NO
21	110531044	0.08	R-22	MSN	YES	YES	NO

21	167644000	0.69	CC	MU	YES	YES	NO
21	167627005	4.00	R-22	MSN	YES	YES	NO
21	110531166	0.06	R-22	MSN	YES	YES	NO
21	110531144	0.04	R-22	MSN	YES	YES	NO
21	110531152	0.05	R-22	MSN	YES	YES	NO
21	167676000	1.30	CC	MU	YES	YES	NO
21	110531150	0.05	R-22	MSN	YES	YES	NO
21	110531034	0.06	R-22	MSN	YES	YES	NO
21	110531168	0.05	R-22	MSN	YES	YES	NO
21	167646000	0.35	CC	MU	YES	YES	NO
21	167627000	9.63	R-22	MU	YES	YES	NO
21	110299946	1.08	CC	MU	YES	YES	NO
21	167672000	3.41	CC	MU	YES	YES	NO
21	167674000	3.81	CC	MU	YES	YES	NO
21	110531042	0.05	R-22	MSN	YES	YES	NO
21	167678000	0.80	CC	MSN	YES	YES	NO
22	111014032	0.22	R-6	MU	YES	NO	YES
22	111014034	0.23	R-6	MU	YES	NO	YES
22	37917103	1.02	R-6	MU	YES	NO	YES
22	37923199	0.18	R-6	MSN	YES	NO	YES
22	165448000	0.18	R-6	MSN	YES	NO	YES
22	37915719	0.17	R-6	MU	YES	NO	YES
22	165431000	0.21	R-6	MSN	YES	NO	YES
22	111037038	0.19	R-6	MSN	YES	NO	YES
22	165430000	0.21	R-6	MSN	YES	NO	YES
22	111014050	0.17	R-6	MU	YES	NO	YES
22	111014048	0.18	R-6	MU	YES	NO	YES
22	111014046	0.18	R-6	MU	YES	NO	YES
22	111014044	0.22	R-6	MU	YES	NO	YES
22	111014036	0.22	R-6	MU	YES	NO	YES
22	111014042	0.20	R-6	MU	YES	NO	YES
22	165420000	0.45	R-6	MSN	YES	NO	YES
22	111014038	0.16	R-6	MU	YES	NO	YES
22	165453000	0.18	R-6	MSN	YES	NO	YES
22	37923200	0.18	R-6	MSN	YES	NO	YES
22	37923201	0.19	R-6	MSN	YES	NO	YES
22	165457000	0.18	R-6	MSN	YES	NO	YES
22	111014040	0.18	R-6	MU	YES	NO	YES
22	37915703	0.17	R-6	MU	YES	NO	YES
22	37915701	0.22	R-6	MU	YES	NO	YES
22	37915705	0.18	R-6	MU	YES	NO	YES
22	37923198	0.18	R-6	MSN	NO	NO	NO
22	111014004	0.20	R-6	MSN	NO	NO	NO
22	165423000	0.33	R-6	MSN	NO	NO	NO
22	165461000	0.18	R-6	MSN	NO	NO	NO
22	165437000	0.10	R-6	MSN	NO	NO	NO
22	111014030	0.19	R-6	MU	NO	NO	NO
22	165436000	0.21	R-6	MSN	NO	NO	NO
22	37923197	0.19	R-6	MSN	NO	NO	NO
22	111014026	0.23	R-6	MU	NO	NO	NO
22	111014006	0.18	R-6	MSN	NO	NO	NO
22	165435000	0.21	R-6	MSN	NO	NO	NO
22	111014002	0.20	R-6	MSN	NO	NO	NO
22	37923196	0.19	R-6	MSN	NO	NO	NO

22	111037090	0.18	R-6	MSN	NO	NO	NO
22	165434000	0.21	R-6	MSN	NO	NO	NO
22	37923206	0.19	R-6	MSN	NO	NO	NO
22	37923207	0.19	R-6	MSN	NO	NO	NO
22	37923205	0.19	R-6	MSN	NO	NO	NO
22	111014008	0.21	R-6	MSN	NO	NO	NO
22	111014028	0.19	R-6	MU	NO	NO	NO
22	111014024	0.21	R-6	MU	NO	NO	NO
22	37923204	0.19	R-6	MSN	NO	NO	NO
22	110881000	0.52	R-6	MSN	NO	NO	NO
22	165433000	0.21	R-6	MSN	NO	NO	NO
22	111037088	0.18	R-6	MSN	NO	NO	NO
22	37923195	0.18	R-6	MSN	NO	NO	NO
22	165438000	0.19	R-6	MSN	NO	NO	NO
22	165440000	0.10	R-6	MSN	NO	NO	NO
22	37915721	0.18	R-6	MU	NO	NO	NO
22	37915711	0.30	R-6	MU	NO	NO	NO
22	165422000	0.25	R-6	MSN	NO	NO	NO
22	37923203	0.19	R-6	MSN	NO	NO	NO
22	37923183	0.19	R-6	MSN	NO	NO	NO
22	37923182	0.19	R-6	MSN	NO	NO	NO
22	37923184	0.19	R-6	MSN	NO	NO	NO
22	111014010	0.17	R-6	MSN	NO	NO	NO
22	37923185	0.19	R-6	MSN	NO	NO	NO
22	165432000	0.21	R-6	MSN	NO	NO	NO
22	111037060	0.19	R-6	MSN	NO	NO	NO
22	165439000	0.20	R-6	MSN	NO	NO	NO
22	111012110	0.17	R-6	MU	NO	NO	NO
22	37923202	0.19	R-6	MSN	NO	NO	NO
22	37917575	0.16	R-6	MSN	NO	NO	NO
22	110869000	0.16	R-6	MSN	NO	NO	NO
22	37923186	0.19	R-6	MSN	NO	NO	NO
22	111011282	0.25	R-6	MSN	NO	NO	NO
22	110886000	0.23	R-6	MSN	NO	NO	NO
22	37915707	0.18	R-6	MSN	NO	NO	NO
22	111037058	0.18	R-6	MSN	NO	NO	NO
22	37915713	0.17	R-6	MU	NO	NO	NO
22	37915709	0.17	R-6	MSN	NO	NO	NO
22	37923187	0.20	R-6	MSN	NO	NO	NO
22	37917553	0.16	R-6	MSN	NO	NO	NO
22	37917611	0.12	R-6	MSN	NO	NO	NO
22	111037040	0.19	R-6	MSN	NO	NO	NO
22	111037042	0.19	R-6	MSN	NO	NO	NO
22	111012108	0.15	R-6	MU	NO	NO	NO
22	37915797	0.21	R-6	MSN	NO	NO	NO
22	111037036	0.19	R-6	MSN	NO	NO	NO
22	111037056	0.18	R-6	MSN	NO	NO	NO
22	110878000	0.23	R-6	MSN	NO	NO	NO
22	111011280	0.25	R-6	MSN	NO	NO	NO
22	37923181	0.19	R-6	MSN	NO	NO	NO
22	110863000	0.30	R-6	MSN	NO	NO	NO
22	37917551	0.18	R-6	MSN	NO	NO	NO
22	165926000	0.28	R-6	MSN	NO	NO	NO
22	37917559	0.17	R-6	MSN	NO	NO	NO

22	165429000	0.21	R-6	MSN	NO	NO	NO
22	37915727	0.17	R-6	MSN	NO	NO	NO
22	165922000	0.27	R-6	MSN	NO	NO	NO
22	37915729	0.17	R-6	MSN	NO	NO	NO
22	37915793	0.21	R-6	MSN	NO	NO	NO
22	37915811	0.17	R-6	MSN	NO	NO	NO
22	37915731	0.17	R-6	MSN	NO	NO	NO
22	37915795	0.19	R-6	MSN	NO	NO	NO
22	165443000	0.23	R-6	LSN	NO	NO	NO
22	165444000	0.18	R-6	LSN	NO	NO	NO
22	165445000	0.21	R-6	LSN	NO	NO	NO
22	165441000	0.24	R-6	LSN	NO	NO	NO
22	165454000	0.19	R-6	LSN	NO	NO	NO
22	165442000	0.24	R-6	LSN	NO	NO	NO
22	111014014	0.17	R-6	LSN	NO	NO	NO
22	111014012	0.16	R-6	LSN	NO	NO	NO
22	110885000	0.44	R-6	LSN	NO	NO	NO
22	111014020	0.23	R-6	LSN	NO	NO	NO
22	111014018	0.16	R-6	LSN	NO	NO	NO
22	111014016	0.16	R-6	LSN	NO	NO	NO
22	111014022	0.19	R-6	LSN	NO	NO	NO
22	111005001	0.23	CC	MU	YES	YES	NO
22	165404000	1.09	CC	MSN	YES	YES	NO
22	165447000	1.36	CC	MU	YES	YES	NO
22	165465000	1.23	CC	MU	YES	YES	NO
22	165476000	0.17	CC	MU	YES	YES	NO
22	165446000	0.16	CC	MU	YES	YES	NO
22	111005000	0.23	CC	MU	YES	YES	NO
22	165958000	0.13	R-22	MU	YES	YES	NO
22	165924000	0.19	R-22	MU	YES	YES	NO
22	110291204	0.23	CC	MU	YES	YES	NO
22	165905000	0.31	R-22	MU	YES	YES	NO
22	110555040	0.19	R-22	MSN	YES	YES	NO
22	165935000	0.38	CC	MU	YES	YES	NO
22	110291200	0.10	CC	MU	YES	YES	NO
22	111010010	0.22	CC	MU	YES	YES	NO
22	37917111	0.22	R-18	MSN	YES	YES	NO
22	37917101	0.52	R-18	MSN	YES	YES	NO
22	110555045	0.20	R-22	MSN	YES	YES	NO
22	111037092	0.18	CC	MSN	YES	YES	NO
22	165491000	0.46	CC	MU	YES	YES	NO
22	165492000	0.34	CC	MU	YES	YES	NO
22	165911000	0.37	CC	MU	YES	YES	NO
22	37917105	0.24	R-18	MU	YES	YES	NO
22	37917113	0.27	R-18	MU	YES	YES	NO
22	167201000	0.21	CC	MU	YES	YES	NO
22	110291202	0.19	CC	MU	YES	YES	NO
22	110291216	0.03	CC	MU	YES	YES	NO
22	110555025	0.20	R-22	MU	YES	YES	NO
22	110291210	0.20	CC	MSN	YES	YES	NO
22	165471000	0.18	CC	MU	YES	YES	NO
22	165909000	0.43	CC	MU	YES	YES	NO
22	37917109	0.24	R-18	MU	YES	YES	NO
22	167200000	0.22	CC	MU	YES	YES	NO

22	167195000	1.76	R-22	MU	YES	YES	NO
22	110555010	0.25	R-22	MU	YES	YES	NO
22	37917107	0.23	R-18	MU	YES	YES	NO
22	110291218	0.28	CC	MU	YES	YES	NO
22	110555020	0.19	R-22	MU	YES	YES	NO
22	37917115	0.32	R-18	MSN	YES	YES	NO
22	165950000	0.22	R-22	MU	YES	YES	NO
22	110291214	0.26	CC	MU	YES	YES	NO
22	110291212	0.23	CC	MSN	YES	YES	NO
22	110555030	0.19	R-22	MU	YES	YES	NO
22	110291208	0.33	CC	MU	YES	YES	NO
22	165918000	0.28	R-22	MSN	YES	YES	NO
22	110555050	0.18	R-22	MSN	YES	YES	NO
22	165933000	0.22	CC	MU	YES	YES	NO
22	165493000	4.24	CC	MU	YES	YES	NO
22	111010009	0.23	CC	MU	YES	YES	NO
22	986028024	0.17	CC	MU	YES	YES	NO
22	110990000	0.91	CC	MU	YES	YES	NO
22	110291206	0.28	CC	MU	YES	YES	NO
22	111010000	0.20	CC	MU	YES	YES	NO
22	165923000	0.21	R-22	MU	YES	YES	NO
22	110975000	1.32	CC	MU	YES	YES	NO
23	37915005	0.22	R-6	MSN	YES	NO	YES
23	37915127	0.17	R-6	MSN	YES	NO	YES
23	37915075	0.17	R-6	MSN	YES	NO	YES
23	37915139	0.17	R-6	MSN	YES	NO	YES
23	37915007	0.22	R-6	MSN	YES	NO	YES
23	37915033	0.21	R-6	MSN	YES	NO	YES
23	37915007	0.22	R-6	MSN	YES	NO	YES
23	37915033	0.21	R-6	MSN	YES	NO	YES
23	37915141	0.17	R-6	MSN	YES	NO	YES
23	37915035	0.22	R-6	MSN	YES	NO	YES
23	37915009	0.22	R-6	MSN	YES	NO	YES
23	37915037	0.22	R-6	MSN	YES	NO	YES
23	37915143	0.17	R-6	MSN	YES	NO	YES
23	37915011	0.22	R-6	MSN	YES	NO	YES
23	37915039	0.22	R-6	MSN	YES	NO	YES
23	37915105	0.17	R-6	MSN	YES	NO	YES
23	37915013	0.22	R-6	MSN	YES	NO	YES
23	37915041	0.22	R-6	MSN	YES	NO	YES
23	37915145	0.17	R-6	MSN	YES	NO	YES
23	37915111	0.17	R-6	MSN	YES	NO	YES
23	37916005	0.17	R-6	MSN	YES	NO	YES
23	37916003	0.18	R-6	MSN	NO	NO	NO
23	37915043	0.22	R-6	MSN	NO	NO	NO
23	37915015	0.21	R-6	MSN	NO	NO	NO
23	37915107	0.17	R-6	MSN	NO	NO	NO
23	37916001	0.17	R-6	MSN	NO	NO	NO
23	37915147	0.17	R-6	MSN	NO	NO	NO
23	37915113	0.17	R-6	MSN	NO	NO	NO
23	37915045	0.22	R-6	MSN	NO	NO	NO
23	37915109	0.17	R-6	MSN	NO	NO	NO
23	37915017	0.22	R-6	MSN	NO	NO	NO
23	37915999	0.18	R-6	MSN	NO	NO	NO
23	37915119	0.17	R-6	MSN	NO	NO	NO
23	37915047	0.22	R-6	MSN	NO	NO	NO

23	37915149	0.17 R-6	MSN	NO	NO	NO
23	37915115	0.17 R-6	MSN	NO	NO	NO
23	37915997	0.18 R-6	MSN	NO	NO	NO
23	37915019	0.22 R-6	MSN	NO	NO	NO
23	37915049	0.22 R-6	MSN	NO	NO	NO
23	37915121	0.17 R-6	MSN	NO	NO	NO
23	37915117	0.17 R-6	MSN	NO	NO	NO
23	37915995	0.18 R-6	MSN	NO	NO	NO
23	37915021	0.22 R-6	MSN	NO	NO	NO
23	37915151	0.17 R-6	MSN	NO	NO	NO
23	37915051	0.22 R-6	MSN	NO	NO	NO
23	37915073	0.17 R-6	MSN	NO	NO	NO
23	37915123	0.17 R-6	MSN	NO	NO	NO
23	37915023	0.22 R-6	MSN	NO	NO	NO
23	37915993	0.17 R-6	MSN	NO	NO	NO
23	37915153	0.17 R-6	MSN	NO	NO	NO
23	37915079	0.17 R-6	MSN	NO	NO	NO
23	37915053	0.22 R-6	MSN	NO	NO	NO
23	37915125	0.17 R-6	MSN	NO	NO	NO
23	37915025	0.23 R-6	MSN	NO	NO	NO
23	37915991	0.18 R-6	MSN	NO	NO	NO
23	37915129	0.17 R-6	MSN	NO	NO	NO
23	37915081	0.17 R-6	MSN	NO	NO	NO
23	37915057	0.24 R-6	MSN	NO	NO	NO
23	37915155	0.17 R-6	MSN	NO	NO	NO
23	37915131	0.17 R-6	MSN	NO	NO	NO
23	37915087	0.17 R-6	MSN	NO	NO	NO
23	37915077	0.17 R-6	MSN	NO	NO	NO
23	37915087	0.17 R-6	MSN	NO	NO	NO
23	37915077	0.17 R-6	MSN	NO	NO	NO
23	37915135	0.17 R-6	MSN	NO	NO	NO
23	37915083	0.17 R-6	MSN	NO	NO	NO
23	37915089	0.17 R-6	MSN	NO	NO	NO
23	37915133	0.17 R-6	MSN	NO	NO	NO
23	37915085	0.17 R-6	MSN	NO	NO	NO
23	37915095	0.17 R-6	MSN	NO	NO	NO
23	37915091	0.17 R-6	MSN	NO	NO	NO
23	37915761	0.18 R-6	MSN	NO	NO	NO
23	37915767	0.18 R-6	MSN	NO	NO	NO
23	37915769	0.19 R-6	MSN	NO	NO	NO
23	37916085	1.74 R-6	POS	NO	NO	NO
23	986056495	1.16 OCI	IC	YES	YES	NO
23	166216002	0.86 OCI	IC	YES	YES	NO
23	166216003	0.86 OCI	IC	YES	YES	NO
23	166216001	0.86 OCI	IC	YES	YES	NO
23	37916219	0.20 OCI	IC	YES	YES	NO
23	37915757	0.20 OCI	MSN	YES	YES	NO
23	37916209	0.17 OCI	IC	YES	YES	NO
23	37916215	0.17 OCI	IC	YES	YES	NO
23	37916225	0.18 OCI	IC	YES	YES	NO
23	37915759	0.25 OCI	MSN	YES	YES	NO
23	37916227	0.19 OCI	IC	YES	YES	NO
23	37916223	0.19 OCI	IC	YES	YES	NO
23	37916221	0.17 OCI	IC	YES	YES	NO
23	37916201	0.18 OCI	IC	YES	YES	NO
23	37916203	0.18 OCI	IC	YES	YES	NO

23	37916205	0.18	OCI	IC	YES	YES	NO
23	37916207	0.18	OCI	IC	YES	YES	NO
23	37916217	0.18	OCI	IC	YES	YES	NO
23	37916341	1.16	OCI	IC	YES	YES	NO
23	37916288	0.89	OCI	IC	YES	YES	NO
23	37916213	0.17	OCI	IC	YES	YES	NO
23	37916211	0.19	OCI	IC	YES	YES	NO
23	37916229	0.18	OCI	IC	YES	YES	NO
23	37915103	0.24	OCI	MSN	YES	YES	NO
23	37915101	0.18	OCI	MSN	YES	YES	NO
23	37915137	0.16	OCI	MSN	YES	YES	NO
23	37915071	0.26	OCI	MSN	YES	YES	NO
23	37915069	0.20	OCI	MSN	YES	YES	NO
23	37915001	0.18	OCI	MSN	YES	YES	NO
23	37915003	0.21	OCI	MSN	YES	YES	NO
23	37915029	0.20	OCI	MSN	YES	YES	NO
23	37916285	4.31	OCI	IC	YES	YES	NO
23	37915031	0.17	OCI	MSN	YES	YES	NO
23	166216000	0.86	OCI	IC	YES	YES	NO
23	110840000	17.58	OCI	IC	YES	YES	NO
23	37916290	0.43	OCI	IC	YES	YES	NO
23	37916007	0.22	OCI	MSN	YES	YES	NO
24	108493028	0.18	R-6	MU	YES	NO	YES
24	108493030	0.17	R-6	MU	YES	NO	YES
24	108493026	0.18	R-6	MU	YES	NO	YES
24	108493032	0.22	R-6	MU	YES	NO	YES
24	108493024	0.17	R-6	MU	YES	NO	YES
24	108493152	0.17	R-6	MSN	YES	NO	YES
24	108493150	0.19	R-6	MSN	YES	NO	YES
24	108493154	0.15	R-6	MSN	YES	NO	YES
24	108493156	0.16	R-6	MSN	YES	NO	YES
24	108493022	0.17	R-6	MU	YES	NO	YES
24	108493034	0.20	R-6	MU	YES	NO	YES
24	108493200	0.19	R-6	MSN	YES	NO	YES
24	108493202	0.19	R-6	MSN	YES	NO	YES
24	108493128	0.19	R-6	MSN	YES	NO	YES
24	108493198	0.20	R-6	MSN	YES	NO	YES
24	108493158	0.16	R-6	MSN	YES	NO	YES
24	108493130	0.19	R-6	MSN	YES	NO	YES
24	108493020	0.18	R-6	MU	YES	NO	YES
24	108493196	0.18	R-6	MSN	YES	NO	YES
24	108493036	0.20	R-6	MU	YES	NO	YES
24	108493126	0.18	R-6	MSN	YES	NO	YES
24	108493132	0.18	R-6	MSN	YES	NO	YES
24	108493160	0.16	R-6	MSN	YES	NO	YES
24	108493194	0.19	R-6	MSN	YES	NO	YES
24	108493018	0.17	R-6	MU	YES	NO	YES
24	108493038	0.21	R-6	MU	YES	NO	YES
24	108493124	0.18	R-6	MSN	YES	NO	YES
24	108493206	0.19	R-6	MSN	YES	NO	YES
24	108493208	0.18	R-6	MSN	YES	NO	YES
24	108493210	0.18	R-6	MSN	YES	NO	YES
24	108493134	0.18	R-6	MSN	YES	NO	YES
24	108493212	0.18	R-6	MSN	YES	NO	YES

24	108493162	0.17	R-6	MSN	YES	NO	YES
24	108493192	0.19	R-6	MSN	YES	NO	YES
24	108493122	0.18	R-6	MSN	YES	NO	YES
24	108493214	0.18	R-6	MSN	YES	NO	YES
24	108493040	0.20	R-6	MU	YES	NO	YES
24	108493016	0.17	R-6	MU	YES	NO	YES
24	108493136	0.18	R-6	MSN	YES	NO	YES
24	108493164	0.16	R-6	MSN	YES	NO	YES
24	108493190	0.18	R-6	MSN	YES	NO	YES
24	108493216	0.18	R-6	MSN	YES	NO	YES
24	108493120	0.18	R-6	MSN	YES	NO	YES
24	108493138	0.18	R-6	MSN	YES	NO	YES
24	108493042	0.21	R-6	MU	YES	NO	YES
24	108493014	0.18	R-6	MU	YES	NO	YES
24	108493218	0.18	R-6	MSN	YES	NO	YES
24	108493188	0.18	R-6	MSN	YES	NO	YES
24	108493166	0.16	R-6	MSN	YES	NO	YES
24	108493118	0.18	R-6	MSN	YES	NO	YES
24	108493140	0.18	R-6	MSN	YES	NO	YES
24	108493044	0.21	R-6	MU	YES	NO	YES
24	108493012	0.17	R-6	MU	YES	NO	YES
24	108493220	0.18	R-6	MSN	YES	NO	YES
24	108493186	0.19	R-6	MSN	YES	NO	YES
24	108493168	0.17	R-6	MSN	YES	NO	YES
24	108493116	0.18	R-6	MSN	NO	NO	NO
24	108493046	0.21	R-6	MU	NO	NO	NO
24	108493184	0.18	R-6	MSN	NO	NO	NO
24	108493010	0.17	R-6	MU	NO	NO	NO
24	108493184	0.18	R-6	MSN	NO	NO	NO
24	108493010	0.17	R-6	MU	NO	NO	NO
24	108493170	0.17	R-6	MSN	NO	NO	NO
24	108493048	0.20	R-6	MU	NO	NO	NO
24	108493008	0.18	R-6	MU	NO	NO	NO
24	108493172	0.17	R-6	MSN	NO	NO	NO
24	108493050	0.20	R-6	MU	NO	NO	NO
24	108493006	0.17	R-6	MU	NO	NO	NO
24	108493004	0.20	R-6	MU	NO	NO	NO
24	108493114	0.18	R-6	MSN	NO	NO	NO
24	109902000	1.54	Park	MSN	NO	NO	NO
24	160041000	3.00	Park	MSN	NO	NO	NO
24	160242000	8.66	Park	MSN	NO	NO	NO
24	160016000	15.60	Park	MSN	NO	NO	NO
24	110296036	0.62	R-22	MSN	YES	YES	NO
24	110296038	0.62	R-22	MSN	YES	YES	NO
24	110296040	0.62	R-22	MSN	YES	YES	NO
24	110291808	1.24	R-22	MSN	YES	YES	NO
24	110291824	1.24	R-22	MSN	YES	YES	NO
24	110291804	1.24	R-22	MSN	YES	YES	NO
24	110291812	1.24	R-22	MSN	YES	YES	NO
24	110291832	1.24	R-22	MSN	YES	YES	NO
24	110291818	1.24	R-22	MSN	YES	YES	NO
24	110291810	1.24	R-22	MSN	YES	YES	NO
24	110291830	1.24	R-22	MSN	YES	YES	NO
24	110291836	1.24	R-22	MSN	YES	YES	NO
24	110291816	1.24	R-22	MSN	YES	YES	NO
24	110291806	1.24	R-22	MSN	YES	YES	NO

24	110291820	1.24	R-22	MSN	YES	YES	NO
24	110291822	1.24	R-22	MSN	YES	YES	NO
24	110291814	1.24	R-22	MSN	YES	YES	NO
24	110291834	1.24	R-22	MSN	YES	YES	NO
24	110291828	1.24	R-22	MSN	YES	YES	NO
24	109895010	0.05	R-22	MSN	YES	YES	NO
24	986026615	0.04	R-22	MSN	YES	YES	NO
24	986026613	0.05	R-22	MSN	YES	YES	NO
24	986026628	0.04	R-22	MSN	YES	YES	NO
24	986026626	0.04	R-22	MSN	YES	YES	NO
24	986026621	0.04	R-22	MSN	YES	YES	NO
24	986026639	0.04	R-22	MSN	YES	YES	NO
24	986026650	0.04	R-22	MU	YES	YES	NO
24	986026651	0.04	R-22	MU	YES	YES	NO
24	986026653	0.04	R-22	MU	YES	YES	NO
24	986026636	0.04	R-22	MSN	YES	YES	NO
24	986026673	0.04	R-22	MSN	YES	YES	NO
24	986026669	0.04	R-22	MSN	YES	YES	NO
24	986026661	0.05	R-22	MSN	YES	YES	NO
24	986026675	0.05	R-22	MSN	YES	YES	NO
24	986026678	0.04	R-22	MSN	YES	YES	NO
24	986026681	0.04	R-22	MSN	YES	YES	NO
24	160020000	1.47	R-22	MU	YES	YES	NO
24	986026634	0.05	R-22	MSN	YES	YES	NO
24	109895020	0.06	R-22	MSN	YES	YES	NO
24	109895056	0.06	R-22	MSN	YES	YES	NO
24	109895048	0.06	R-22	MSN	YES	YES	NO
24	986026632	0.06	R-22	MSN	YES	YES	NO
24	109895048	0.06	R-22	MSN	YES	YES	NO
24	986026632	0.06	R-22	MSN	YES	YES	NO
24	986026616	0.05	R-22	MSN	YES	YES	NO
24	986026614	0.04	R-22	MSN	YES	YES	NO
24	986026612	0.05	R-22	MSN	YES	YES	NO
24	986026629	0.04	R-22	MSN	YES	YES	NO
24	986026627	0.04	R-22	MSN	YES	YES	NO
24	986026620	0.04	R-22	MSN	YES	YES	NO
24	986026638	0.04	R-22	MSN	YES	YES	NO
24	986026640	0.04	R-22	MSN	YES	YES	NO
24	986026646	0.04	R-22	MU	YES	YES	NO
24	986026652	0.04	R-22	MU	YES	YES	NO
24	986026635	0.07	R-22	MSN	YES	YES	NO
24	986026649	0.04	R-22	MU	YES	YES	NO
24	986026685	0.04	R-22	MSN	YES	YES	NO
24	986026676	0.05	R-22	MSN	YES	YES	NO
24	986026674	0.04	R-22	MSN	YES	YES	NO
24	986026672	0.08	R-22	MSN	YES	YES	NO
24	986026670	0.04	R-22	MSN	YES	YES	NO
24	986026660	0.04	R-22	MSN	YES	YES	NO
24	986026662	0.05	R-22	MSN	YES	YES	NO
24	986026671	0.08	R-22	MSN	YES	YES	NO
24	986026677	0.04	R-22	MSN	YES	YES	NO
24	160063000	1.13	R-22	MSN	YES	YES	NO
24	160030000	0.60	OCI	MU	YES	YES	NO
24	160028000	0.48	R-22	MU	YES	YES	NO
24	160026000	0.45	R-22	MU	YES	YES	NO
24	986026611	0.04	R-22	MSN	YES	YES	NO

24	986026631	0.04	R-22	MSN	YES	YES	NO
24	986026630	0.04	R-22	MSN	YES	YES	NO
24	986026648	0.04	R-22	MU	YES	YES	NO
24	986026657	0.04	R-22	MSN	YES	YES	NO
24	986026686	0.04	R-22	MSN	YES	YES	NO
24	986026658	0.04	R-22	MSN	YES	YES	NO
24	986026654	0.03	R-22	MU	YES	YES	NO
24	986026683	0.05	R-22	MSN	YES	YES	NO
24	986026679	0.05	R-22	MSN	YES	YES	NO
24	986026680	0.05	R-22	MSN	YES	YES	NO
24	986026682	0.04	R-22	MSN	YES	YES	NO
24	986026684	0.05	R-22	MSN	YES	YES	NO
24	110296034	0.62	R-22	MSN	YES	YES	NO
24	160042000	0.61	R-18	MSN	YES	YES	NO
24	109906000	0.21	R-22	MSN	YES	YES	NO
24	109895018	0.06	R-22	MSN	YES	YES	NO
24	109895016	0.06	R-22	MSN	YES	YES	NO
24	109895002	0.06	R-22	MSN	YES	YES	NO
24	986026617	0.05	R-22	MSN	YES	YES	NO
24	986026625	0.05	R-22	MSN	YES	YES	NO
24	986026624	0.05	R-22	MSN	YES	YES	NO
24	986026623	0.04	R-22	MSN	YES	YES	NO
24	986026622	0.04	R-22	MSN	YES	YES	NO
24	986026689	0.03	R-22	MU	YES	YES	NO
24	986026637	0.04	R-22	MSN	YES	YES	NO
24	986026641	0.04	R-22	MSN	YES	YES	NO
24	986026642	0.04	R-22	MSN	YES	YES	NO
24	986026643	0.04	R-22	MSN	YES	YES	NO
24	986026642	0.04	R-22	MSN	YES	YES	NO
24	986026643	0.04	R-22	MSN	YES	YES	NO
24	986026663	0.04	R-22	MSN	YES	YES	NO
24	986026659	0.04	R-22	MSN	YES	YES	NO
24	986026664	0.04	R-22	MSN	YES	YES	NO
24	986026665	0.04	R-22	MSN	YES	YES	NO
24	986026666	0.04	R-22	MSN	YES	YES	NO
24	986026667	0.08	R-22	MSN	YES	YES	NO
24	109905000	0.50	R-22	MSN	YES	YES	NO
24	110291802	1.24	R-22	MSN	YES	YES	NO
24	110291826	0.30	R-22	MSN	YES	YES	NO
24	986026687	0.05	R-22	MSN	YES	YES	NO
24	109895014	0.06	R-22	MSN	YES	YES	NO
24	109895044	0.06	R-22	MSN	YES	YES	NO
24	986026619	0.07	R-22	MSN	YES	YES	NO
24	986026688	0.08	R-22	MSN	YES	YES	NO
24	986026668	0.06	R-22	MSN	YES	YES	NO
24	986026644	0.06	R-22	MSN	YES	YES	NO
24	986026645	0.07	R-22	MU	YES	YES	NO
24	109895050	0.06	R-22	MSN	YES	YES	NO
24	109895046	0.06	R-22	MSN	YES	YES	NO
24	160029000	0.81	OCI	MU	YES	YES	NO
24	160033000	0.33	R-22	MSN	YES	YES	NO
24	986026656	0.05	R-22	MSN	YES	YES	NO
24	986026618	0.07	R-22	MSN	YES	YES	NO
24	109895004	0.08	R-22	MSN	YES	YES	NO
24	109895054	0.08	R-22	MSN	YES	YES	NO
24	109895052	0.06	R-22	MSN	YES	YES	NO

24	986026655	0.07	R-22	MU	YES	YES	NO
24	986026633	0.06	R-22	MSN	YES	YES	NO
24	109895008	0.05	R-22	MSN	YES	YES	NO
24	109895012	0.05	R-22	MSN	YES	YES	NO
24	109895006	0.05	R-22	MSN	YES	YES	NO
24	109890002	0.05	R-22	MSN	YES	YES	NO
25	110286182	0.23	R-6	MU	YES	NO	YES
25	110286184	0.23	R-6	MU	NO	NO	NO
25	110286188	0.19	R-6	MSN	YES	NO	YES
25	110286080	0.19	R-6	MSN	NO	NO	NO
25	110286186	0.18	R-6	MSN	NO	NO	NO
25	110286060	0.17	R-6	MSN	NO	NO	NO
25	110286098	0.19	R-6	MSN	NO	NO	NO
25	110286062	0.19	R-6	MSN	NO	NO	NO
25	110286058	0.17	R-6	MSN	NO	NO	NO
25	114727666	1.87	R-22	MU	YES	YES	NO
25	114727608	1.59	CC	MU	YES	YES	NO
25	110286076	0.72	CC	MU	YES	YES	NO
25	110286074	0.80	CC	MU	YES	YES	NO
25	114755000	0.35	CC	MU	YES	YES	NO
25	110286180	0.24	CC	MU	YES	YES	NO
25	110286192	0.24	CC	MU	YES	YES	NO
25	114757000	2.39	CC	MU	YES	YES	NO
25	114727622	1.65	OCI	MU	YES	YES	NO
25	114727617	2.29	CC	MU	YES	YES	NO
25	110286178	0.23	CC	MU	YES	YES	NO
25	114727668	0.20	CC	MU	YES	YES	NO
25	114727677	0.25	CC	MU	YES	YES	NO
25	114727671	0.33	CC	MU	YES	YES	NO
25	110286190	0.25	CC	MU	YES	YES	NO
25	114727672	2.64	CC	MU	YES	YES	NO
25	114760000	7.88	CC	MU	YES	YES	NO
25	114778000	0.92	CC	MU	YES	YES	NO
25	114756000	2.11	CC	MU	YES	YES	NO
25	114775005	3.07	CC	MU	YES	YES	NO
25	110286176	0.37	CC	MU	YES	YES	NO
25	114732000	4.88	CC	MU	YES	YES	NO
25	114740000	2.15	CC	MU	YES	YES	NO
25	114727670	1.75	CC	MU	YES	YES	NO
25	114727606	1.79	CC	MU	YES	YES	NO
25	114403000	6.85	R-22	MSN	YES	YES	NO
25	114727664	9.83	R-18	MU	YES	YES	NO
25	110286194	0.33	CC	MU	YES	YES	NO
25	114775000	3.51	CC	MU	YES	YES	NO
25	114727610	6.85	OCI	MU	YES	YES	NO
25	114727669	0.22	CC	MU	NO	NO	NO
26	115301060	0.27	R-6	MSN	YES	NO	YES
26	115301058	0.28	R-6	MSN	YES	NO	YES
26	115301056	0.26	R-6	MSN	YES	NO	YES
26	115301002	0.30	R-9	MSN	YES	NO	YES
26	115301020	0.31	R-6	MSN	NO	NO	NO
26	115301022	0.28	R-6	MSN	NO	NO	NO
26	115301054	0.36	R-6	MSN	NO	NO	NO
26	115301024	0.28	R-6	MSN	NO	NO	NO

26	110538502	0.17	R-6	MSN	YES	NO	YES
26	110538716	0.20	R-6	MSN	NO	NO	NO
26	110538500	0.21	R-6	MSN	NO	NO	NO
26	114790000	2.24	Park	POS	NO	NO	NO
26	115284004	2.10	OCI	MU	YES	YES	NO
26	115284005	2.10	OCI	MU	YES	YES	NO
26	115284002	2.10	OCI	MU	YES	YES	NO
26	115284006	2.10	OCI	MU	YES	YES	NO
26	115284003	2.10	OCI	MU	YES	YES	NO
26	604421000	12.32	R-22	MHP	YES	YES	NO
26	604042000	12.32	R-22	MHP	YES	YES	NO
26	602990000	12.32	R-22	MHP	YES	YES	NO
26	603429000	12.32	R-22	MHP	YES	YES	NO
26	602577000	12.32	R-22	MHP	YES	YES	NO
26	605037000	12.32	R-22	MHP	YES	YES	NO
26	602745000	12.32	R-22	MHP	YES	YES	NO
26	600068000	12.32	R-22	MHP	YES	YES	NO
26	600282000	12.32	R-22	MHP	YES	YES	NO
26	604934000	12.32	R-22	MHP	YES	YES	NO
26	602864000	12.32	R-22	MHP	YES	YES	NO
26	986050688	12.32	R-22	MHP	YES	YES	NO
26	602576000	12.32	R-22	MHP	YES	YES	NO
26	600763000	12.32	R-22	MHP	YES	YES	NO
26	610378000	12.32	R-22	MHP	YES	YES	NO
26	604167000	12.32	R-22	MHP	YES	YES	NO
26	986039336	12.32	R-22	MHP	YES	YES	NO
26	604398000	12.32	R-22	MHP	YES	YES	NO
26	604583000	12.32	R-22	MHP	YES	YES	NO
26	604398000	12.32	R-22	MHP	YES	YES	NO
26	604583000	12.32	R-22	MHP	YES	YES	NO
26	602562000	12.32	R-22	MHP	YES	YES	NO
26	604740000	12.32	R-22	MHP	YES	YES	NO
26	603936000	12.32	R-22	MHP	YES	YES	NO
26	600652000	12.32	R-22	MHP	YES	YES	NO
26	602639000	12.32	R-22	MHP	YES	YES	NO
26	601416000	12.32	R-22	MHP	YES	YES	NO
26	604281000	12.32	R-22	MHP	YES	YES	NO
26	602656000	12.32	R-22	MHP	YES	YES	NO
26	986038978	12.32	R-22	MHP	YES	YES	NO
26	602793000	12.32	R-22	MHP	YES	YES	NO
26	602388000	12.32	R-22	MHP	YES	YES	NO
26	603628000	12.32	R-22	MHP	YES	YES	NO
26	604805000	12.32	R-22	MHP	YES	YES	NO
26	604600000	12.32	R-22	MHP	YES	YES	NO
26	606675000	12.32	R-22	MHP	YES	YES	NO
26	604597000	12.32	R-22	MHP	YES	YES	NO
26	604939000	12.32	R-22	MHP	YES	YES	NO
26	601681000	12.32	R-22	MHP	YES	YES	NO
26	601085000	12.32	R-22	MHP	YES	YES	NO
26	600244000	12.32	R-22	MHP	YES	YES	NO
26	610854000	12.32	R-22	MHP	YES	YES	NO
26	601621000	12.32	R-22	MHP	YES	YES	NO
26	610452000	12.32	R-22	MHP	YES	YES	NO
26	603069000	12.32	R-22	MHP	YES	YES	NO
26	986056452	12.32	R-22	MHP	YES	YES	NO
26	603424000	12.32	R-22	MHP	YES	YES	NO

26	602575000	12.32 R-22	MHP	YES	YES	NO
26	611209000	12.32 R-22	MHP	YES	YES	NO
26	602669000	12.32 R-22	MHP	YES	YES	NO
26	602167000	12.32 R-22	MHP	YES	YES	NO
26	604222000	12.32 R-22	MHP	YES	YES	NO
26	600568000	12.32 R-22	MHP	YES	YES	NO
26	604348000	12.32 R-22	MHP	YES	YES	NO
26	604462000	12.32 R-22	MHP	YES	YES	NO
26	601372000	12.32 R-22	MHP	YES	YES	NO
26	602449000	12.32 R-22	MHP	YES	YES	NO
26	604148000	12.32 R-22	MHP	YES	YES	NO
26	605799000	12.32 R-22	MHP	YES	YES	NO
26	610853000	12.32 R-22	MHP	YES	YES	NO
26	611015000	12.32 R-22	MHP	YES	YES	NO
26	604969000	12.32 R-22	MHP	YES	YES	NO
26	604422000	12.32 R-22	MHP	YES	YES	NO
26	602649000	12.32 R-22	MHP	YES	YES	NO
26	602091000	12.32 R-22	MHP	YES	YES	NO
26	601290000	12.32 R-22	MHP	YES	YES	NO
26	604933000	12.32 R-22	MHP	YES	YES	NO
26	601880000	12.32 R-22	MHP	YES	YES	NO
26	603225000	12.32 R-22	MHP	YES	YES	NO
26	606760000	12.32 R-22	MHP	YES	YES	NO
26	602481000	12.32 R-22	MHP	YES	YES	NO
26	603208000	12.32 R-22	MHP	YES	YES	NO
26	605041000	12.32 R-22	MHP	YES	YES	NO
26	603248000	12.32 R-22	MHP	YES	YES	NO
26	604317000	12.32 R-22	MHP	YES	YES	NO
26	603248000	12.32 R-22	MHP	YES	YES	NO
26	604317000	12.32 R-22	MHP	YES	YES	NO
26	601931000	12.32 R-22	MHP	YES	YES	NO
26	607963000	12.32 R-22	MHP	YES	YES	NO
26	600500000	12.32 R-22	MHP	YES	YES	NO
26	602330000	12.32 R-22	MHP	YES	YES	NO
26	601371000	12.32 R-22	MHP	YES	YES	NO
26	603569000	12.32 R-22	MHP	YES	YES	NO
26	600097000	12.32 R-22	MHP	YES	YES	NO
26	986031737	12.32 R-22	MHP	YES	YES	NO
26	986046138	12.32 R-22	MHP	YES	YES	NO
26	601679000	12.32 R-22	MHP	YES	YES	NO
26	986056417	12.32 R-22	MHP	YES	YES	NO
26	600171000	12.32 R-22	MHP	YES	YES	NO
26	603056000	12.32 R-22	MHP	YES	YES	NO
26	603925000	12.32 R-22	MHP	YES	YES	NO
26	604156000	12.32 R-22	MHP	YES	YES	NO
26	603047000	12.32 R-22	MHP	YES	YES	NO
26	600601000	12.32 R-22	MHP	YES	YES	NO
26	602836000	12.32 R-22	MHP	YES	YES	NO
26	600379000	12.32 R-22	MHP	YES	YES	NO
26	600015000	8.12 R-22	MHP	YES	YES	NO
26	601774000	8.12 R-22	MHP	YES	YES	NO
26	600602000	8.12 R-22	MHP	YES	YES	NO
26	607073000	8.12 R-22	MHP	YES	YES	NO
26	601583000	8.12 R-22	MHP	YES	YES	NO
26	603769000	8.12 R-22	MHP	YES	YES	NO
26	601624000	8.12 R-22	MHP	YES	YES	NO

26	604663000	8.12 R-22	MHP	YES	YES	NO
26	602391000	8.12 R-22	MHP	YES	YES	NO
26	601801000	8.12 R-22	MHP	YES	YES	NO
26	605629000	8.12 R-22	MHP	YES	YES	NO
26	600247000	8.12 R-22	MHP	YES	YES	NO
26	605786000	8.12 R-22	MHP	YES	YES	NO
26	603132000	8.12 R-22	MHP	YES	YES	NO
26	601858000	8.12 R-22	MHP	YES	YES	NO
26	611741000	8.12 R-22	MHP	YES	YES	NO
26	607445000	8.12 R-22	MHP	YES	YES	NO
26	600575000	8.12 R-22	MHP	YES	YES	NO
26	602574000	8.12 R-22	MHP	YES	YES	NO
26	602152000	8.12 R-22	MHP	YES	YES	NO
26	602129000	8.12 R-22	MHP	YES	YES	NO
26	602477000	8.12 R-22	MHP	YES	YES	NO
26	601986000	8.12 R-22	MHP	YES	YES	NO
26	600324000	8.12 R-22	MHP	YES	YES	NO
26	602962000	8.12 R-22	MHP	YES	YES	NO
26	602235000	8.12 R-22	MHP	YES	YES	NO
26	601585000	8.12 R-22	MHP	YES	YES	NO
26	605479000	8.12 R-22	MHP	YES	YES	NO
26	604028000	8.12 R-22	MHP	YES	YES	NO
26	603727000	8.12 R-22	MHP	YES	YES	NO
26	600597000	8.12 R-22	MHP	YES	YES	NO
26	608191000	8.12 R-22	MHP	YES	YES	NO
26	602139000	8.12 R-22	MHP	YES	YES	NO
26	604280000	8.12 R-22	MHP	YES	YES	NO
26	604629000	8.12 R-22	MHP	YES	YES	NO
26	604032000	8.12 R-22	MHP	YES	YES	NO
26	601033000	8.12 R-22	MHP	YES	YES	NO
26	602487000	8.12 R-22	MHP	YES	YES	NO
26	601056000	8.12 R-22	MHP	YES	YES	NO
26	601968000	8.12 R-22	MHP	YES	YES	NO
26	601310000	8.12 R-22	MHP	YES	YES	NO
26	603009000	8.12 R-22	MHP	YES	YES	NO
26	604092000	8.12 R-22	MHP	YES	YES	NO
26	602319000	8.12 R-22	MHP	YES	YES	NO
26	601623000	8.12 R-22	MHP	YES	YES	NO
26	603635000	8.12 R-22	MHP	YES	YES	NO
26	600750000	8.12 R-22	MHP	YES	YES	NO
26	604149000	8.12 R-22	MHP	YES	YES	NO
26	601156000	8.12 R-22	MHP	YES	YES	NO
26	604990000	8.12 R-22	MHP	YES	YES	NO
26	604950000	8.12 R-22	MHP	YES	YES	NO
26	603450000	8.12 R-22	MHP	YES	YES	NO
26	602315000	8.12 R-22	MHP	YES	YES	NO
26	604040000	8.12 R-22	MHP	YES	YES	NO
26	606597000	8.12 R-22	MHP	YES	YES	NO
26	604140000	8.12 R-22	MHP	YES	YES	NO
26	115301294	3.99 R-30	MU	YES	YES	NO
26	115301248	3.99 R-30	MU	YES	YES	NO
26	115301234	3.99 R-30	MU	YES	YES	NO
26	115301240	3.99 R-30	MU	YES	YES	NO
26	115301228	3.99 R-30	MU	YES	YES	NO

26	115301300	3.99	R-30	MU	YES	YES	NO
26	115301330	3.99	R-30	MU	YES	YES	NO
26	115301224	3.99	R-30	MU	YES	YES	NO
26	115301244	3.99	R-30	MU	YES	YES	NO
26	115301304	3.99	R-30	MU	YES	YES	NO
26	115301238	3.99	R-30	MU	YES	YES	NO
26	115301230	3.99	R-30	MU	YES	YES	NO
26	115301250	3.99	R-30	MU	YES	YES	NO
26	115301290	3.99	R-30	MU	YES	YES	NO
26	115301310	3.99	R-30	MU	YES	YES	NO
26	115301270	3.99	R-30	MU	YES	YES	NO
26	115301296	3.99	R-30	MU	YES	YES	NO
26	115301284	3.99	R-30	MU	YES	YES	NO
26	115301264	3.99	R-30	MU	YES	YES	NO
26	115301324	3.99	R-30	MU	YES	YES	NO
26	115301218	3.99	R-30	MU	YES	YES	NO
26	115301262	3.99	R-30	MU	YES	YES	NO
26	115301328	3.99	R-30	MU	YES	YES	NO
26	115301282	3.99	R-30	MU	YES	YES	NO
26	115301276	3.99	R-30	MU	YES	YES	NO
26	115301316	3.99	R-30	MU	YES	YES	NO
26	115301222	3.99	R-30	MU	YES	YES	NO
26	115301242	3.99	R-30	MU	YES	YES	NO
26	115301322	3.99	R-30	MU	YES	YES	NO
26	115301256	3.99	R-30	MU	YES	YES	NO
26	115301236	3.99	R-30	MU	YES	YES	NO
26	115301216	3.99	R-30	MU	YES	YES	NO
26	115301266	3.99	R-30	MU	YES	YES	NO
26	115301216	3.99	R-30	MU	YES	YES	NO
26	115301266	3.99	R-30	MU	YES	YES	NO
26	115301302	3.99	R-30	MU	YES	YES	NO
26	115301288	3.99	R-30	MU	YES	YES	NO
26	115301268	3.99	R-30	MU	YES	YES	NO
26	115301308	3.99	R-30	MU	YES	YES	NO
26	115301292	3.99	R-30	MU	YES	YES	NO
26	115301246	3.99	R-30	MU	YES	YES	NO
26	115301286	3.99	R-30	MU	YES	YES	NO
26	115301326	3.99	R-30	MU	YES	YES	NO
26	115301306	3.99	R-30	MU	YES	YES	NO
26	115301312	3.99	R-30	MU	YES	YES	NO
26	115301272	3.99	R-30	MU	YES	YES	NO
26	115301278	3.99	R-30	MU	YES	YES	NO
26	115301252	3.99	R-30	MU	YES	YES	NO
26	115301258	3.99	R-30	MU	YES	YES	NO
26	115301226	3.99	R-30	MU	YES	YES	NO
26	115301232	3.99	R-30	MU	YES	YES	NO
26	115301254	3.99	R-30	MU	YES	YES	NO
26	115301274	3.99	R-30	MU	YES	YES	NO
26	115301260	3.99	R-30	MU	YES	YES	NO
26	115301298	3.99	R-30	MU	YES	YES	NO
26	115301318	3.99	R-30	MU	YES	YES	NO
26	115301320	3.99	R-30	MU	YES	YES	NO
26	115301214	3.99	R-30	MU	YES	YES	NO
26	115301314	3.99	R-30	MU	YES	YES	NO
26	115301220	3.99	R-30	MU	YES	YES	NO
26	115301280	3.99	R-30	MU	YES	YES	NO

26	114868000	0.89	CC	MU	YES	YES	NO
26	114869000	0.28	CC	MU	YES	YES	NO
26	114865000	0.13	CC	MU	YES	YES	NO
26	92007936	0.18	R-22	MU	YES	YES	NO
26	115301202	0.24	CC	MU	YES	YES	NO
26	115291000	0.84	R-22	MU	YES	YES	NO
26	115270000	0.60	OCI	MU	YES	YES	NO
26	115284001	2.10	OCI	MU	YES	YES	NO
26	115285000	12.32	R-22	MHP	YES	YES	NO
26	115275000	8.12	R-22	MHP	YES	YES	NO
26	114850000	0.17	CC	MU	YES	YES	NO
26	115301198	0.23	CC	MU	YES	YES	NO
26	115301212	3.99	R-30	MU	YES	YES	NO
26	115301210	0.68	CC	MU	YES	YES	NO
26	115301206	0.76	CC	MU	YES	YES	NO
26	115301204	0.57	CC	MU	YES	YES	NO
26	114867000	0.26	CC	MU	YES	YES	NO
26	115066000	0.93	CC	MU	YES	YES	NO
26	115292000	9.52	R-22	MU	YES	YES	NO
26	115301199	0.31	CC	MU	YES	YES	NO
26	114866000	1.66	CC	MU	YES	YES	NO
26	114881000	4.77	CC	MU	YES	YES	NO
26	115294000	9.52	R-22	MSN	YES	YES	NO
26	114793000	0.59	CC	MU	YES	YES	NO
26	114880000	3.60	CC	MU	YES	YES	NO
27	110291078	0.17	R-6	MSN	YES	NO	YES
27	165721000	0.70	CG		0 YES	NO	YES
27	110291056	0.17	R-6	MSN	YES	NO	YES
27	110291108	0.17	R-6	MSN	YES	NO	YES
27	110291054	0.17	R-6	MSN	YES	NO	YES
27	110291236	0.16	R-6	MSN	YES	NO	YES
27	110291110	0.18	R-6	MSN	YES	NO	YES
27	110291234	0.21	R-6	MSN	YES	NO	YES
27	110291052	0.17	R-6	MSN	YES	NO	YES
27	110291238	0.15	R-6	MSN	NO	NO	NO
27	110291058	0.17	R-6	MSN	NO	NO	NO
27	110291060	0.17	R-6	MSN	NO	NO	NO
27	110291112	0.18	R-6	MSN	NO	NO	NO
27	110291050	0.17	R-6	MSN	NO	NO	NO
27	110291062	0.17	R-6	MSN	NO	NO	NO
27	110291114	0.18	R-6	MSN	NO	NO	NO
27	110291064	0.17	R-6	MSN	NO	NO	NO
27	110291048	0.17	R-6	MSN	NO	NO	NO
27	110291076	0.17	R-6	MSN	NO	NO	NO
27	110291074	0.17	R-6	MSN	NO	NO	NO
27	110291072	0.17	R-6	MSN	NO	NO	NO
27	110291066	0.17	R-6	MSN	NO	NO	NO
27	110291116	0.18	R-6	MSN	NO	NO	NO
27	110555530	0.18	R-6	MSN	NO	NO	NO
27	110291070	0.17	R-6	MSN	NO	NO	NO
27	110291080	0.17	R-6	MSN	NO	NO	NO
27	110555540	0.19	R-6	MSN	NO	NO	NO
27	110291118	0.18	R-6	MSN	NO	NO	NO
27	110291082	0.17	R-6	MSN	NO	NO	NO

27	110555545	0.18 R-6	MSN	NO	NO	NO
27	110291068	0.17 R-6	MSN	NO	NO	NO
27	110291084	0.17 R-6	MSN	NO	NO	NO
27	110555550	0.18 R-6	MSN	NO	NO	NO
27	110291120	0.18 R-6	MSN	NO	NO	NO
27	110555560	0.19 R-6	MSN	NO	NO	NO
27	110291086	0.17 R-6	MSN	NO	NO	NO
27	110291096	0.17 R-6	MSN	NO	NO	NO
27	110291094	0.17 R-6	MSN	NO	NO	NO
27	110555565	0.19 R-6	MSN	NO	NO	NO
27	110291092	0.17 R-6	MSN	NO	NO	NO
27	110291122	0.18 R-6	MSN	NO	NO	NO
27	110291090	0.17 R-6	MSN	NO	NO	NO
27	110555570	0.18 R-6	MSN	NO	NO	NO
27	110291088	0.17 R-6	MSN	NO	NO	NO
27	110555580	0.18 R-6	MSN	NO	NO	NO
27	110555450	0.19 R-6	MSN	NO	NO	NO
27	110555440	0.19 R-6	MSN	NO	NO	NO
27	110532466	2.11 CC	MU	YES	YES	NO
27	110532496	2.11 CC	MU	YES	YES	NO
27	110532490	2.11 CC	MU	YES	YES	NO
27	110532450	2.11 CC	MU	YES	YES	NO
27	110532510	2.11 CC	MU	YES	YES	NO
27	110532476	2.11 CC	MU	YES	YES	NO
27	110532456	2.11 CC	MU	YES	YES	NO
27	110532470	2.11 CC	MU	YES	YES	NO
27	110532516	2.11 CC	MU	YES	YES	NO
27	110532522	2.11 CC	MU	YES	YES	NO
27	110532516	2.11 CC	MU	YES	YES	NO
27	110532522	2.11 CC	MU	YES	YES	NO
27	110532436	2.11 CC	MU	YES	YES	NO
27	110532454	2.11 CC	MU	YES	YES	NO
27	110532474	2.11 CC	MU	YES	YES	NO
27	110532442	2.11 CC	MU	YES	YES	NO
27	110532502	2.11 CC	MU	YES	YES	NO
27	110532462	2.11 CC	MU	YES	YES	NO
27	110532482	2.11 CC	MU	YES	YES	NO
27	110532468	2.11 CC	MU	YES	YES	NO
27	110532488	2.11 CC	MU	YES	YES	NO
27	110532508	2.11 CC	MU	YES	YES	NO
27	110532448	2.11 CC	MU	YES	YES	NO
27	110532494	2.11 CC	MU	YES	YES	NO
27	110532514	2.11 CC	MU	YES	YES	NO
27	110532492	2.11 CC	MU	YES	YES	NO
27	110532518	2.11 CC	MU	YES	YES	NO
27	110532472	2.11 CC	MU	YES	YES	NO
27	110532452	2.11 CC	MU	YES	YES	NO
27	110532498	2.11 CC	MU	YES	YES	NO
27	110532512	2.11 CC	MU	YES	YES	NO
27	110532484	2.11 CC	MU	YES	YES	NO
27	110532504	2.11 CC	MU	YES	YES	NO
27	110532524	2.11 CC	MU	YES	YES	NO
27	110532458	2.11 CC	MU	YES	YES	NO
27	110532464	2.11 CC	MU	YES	YES	NO
27	110532444	2.11 CC	MU	YES	YES	NO
27	110532438	2.11 CC	MU	YES	YES	NO

27	110532520	2.11 CC	MU	YES	YES	NO
27	110532506	2.11 CC	MU	YES	YES	NO
27	110532478	2.11 CC	MU	YES	YES	NO
27	110532434	2.11 CC	MU	YES	YES	NO
27	110532486	2.11 CC	MU	YES	YES	NO
27	110532526	2.11 CC	MU	YES	YES	NO
27	110532500	2.11 CC	MU	YES	YES	NO
27	110532480	2.11 CC	MU	YES	YES	NO
27	110532460	2.11 CC	MU	YES	YES	NO
27	110532446	2.11 CC	MU	YES	YES	NO
27	110532440	2.11 CC	MU	YES	YES	NO
27	165728000	0.99 CG	MU	YES	YES	NO
27	165700000	0.85 CC	MU	YES	YES	NO
27	110555310	0.16 R-22	MU	YES	YES	NO
27	110555500	0.17 R-22	MU	YES	YES	NO
27	110555495	0.19 R-22	MU	YES	YES	NO
27	110555475	0.18 R-22	MSN	YES	YES	NO
27	110291018	0.17 CG	MU	YES	YES	NO
27	165720000	1.09 CG	MU	YES	YES	NO
27	165722000	1.13 CG	MU	YES	YES	NO
27	110555490	0.20 R-22	MU	YES	YES	NO
27	110291042	0.17 CG	MU	YES	YES	NO
27	110555480	0.19 R-22	MU	YES	YES	NO
27	110291012	0.17 CG	MU	YES	YES	NO
27	110555455	0.19 R-22	MSN	YES	YES	NO
27	110532432	2.11 CC	MU	YES	YES	NO
27	165727000	0.20 CC	MU	YES	YES	NO
27	165724000	0.15 CC	MU	YES	YES	NO
27	110555320	0.20 R-22	MU	YES	YES	NO
27	110291040	0.17 CG	MU	YES	YES	NO
27	110291044	0.17 CG	MU	YES	YES	NO
27	110291010	0.18 CG	MU	YES	YES	NO
27	110291016	0.17 CG	MU	YES	YES	NO
27	110291022	0.17 CG	MU	YES	YES	NO
27	165707000	1.46 R-22	MSN	YES	YES	NO
27	165697000	0.23 CC	MU	YES	YES	NO
27	110555315	0.18 R-22	MU	YES	YES	NO
27	110291046	0.17 CG	MU	YES	YES	NO
27	110555330	0.18 R-22	MU	YES	YES	NO
27	110555470	0.19 R-22	MSN	YES	YES	NO
27	110555460	0.20 R-22	MSN	YES	YES	NO
27	110291014	0.17 CG	MU	YES	YES	NO
27	165729000	1.57 CG	MU	YES	YES	NO
27	165910000	1.28 CG	MU	YES	YES	NO
27	165965000	0.91 CG	MU	YES	YES	NO
27	165891000	0.50 CC	MU	YES	YES	NO
27	110555525	0.18 CC	MU	YES	YES	NO
27	165934000	0.12 CC	MU	YES	YES	NO
27	110555510	0.45 CC	MU	YES	YES	NO
27	165954000	4.84 CG	MU	YES	YES	NO
27	110291002	0.32 CG	MU	YES	YES	NO
27	110291008	0.06 CG	MU	YES	YES	NO
27	110291020	0.17 CG	MU	YES	YES	NO
27	165666000	1.53 CG	MU	YES	YES	NO

27	110291032	0.18	CG	MU	YES	YES	NO
27	110291030	0.18	CG	MU	YES	YES	NO
27	110291028	0.16	CG	MU	YES	YES	NO
27	165899000	0.15	CC	MU	YES	YES	NO
27	110291038	0.17	CG	MU	YES	YES	NO
27	110291034	0.17	CG	MU	YES	YES	NO
27	165946000	0.20	CC	MU	YES	YES	NO
27	110291036	0.17	CG	MU	YES	YES	NO
27	165913000	0.37	CC	MU	YES	YES	NO
27	165930000	0.14	CC	MU	YES	YES	NO
27	165912000	0.34	CC	MU	YES	YES	NO
27	165660000	5.31	R-22	MSN	YES	YES	NO
27	165663000	1.57	CC	MU	YES	YES	NO
27	165964000	0.83	CG	MU	YES	YES	NO
27	165698000	1.86	CC	MU	YES	YES	NO
27	165665000	22.10	CG	MU	YES	YES	NO
28	110312010	0.66	R-18	MSN	YES	YES	NO
28	110312014	0.66	R-18	MSN	YES	YES	NO
28	110312008	0.66	R-18	MSN	YES	YES	NO
28	110312020	0.66	R-18	MSN	YES	YES	NO
28	110312018	0.66	R-18	MSN	YES	YES	NO
28	110312012	0.66	R-18	MSN	YES	YES	NO
28	110312006	0.66	R-18	MSN	YES	YES	NO
28	110312016	0.66	R-18	MSN	YES	YES	NO
28	110312004	0.66	R-18	MSN	YES	YES	NO
28	110302004	0.49	R-18	MSN	YES	YES	NO
28	110302010	0.49	R-18	MSN	YES	YES	NO
28	110302008	0.49	R-18	MSN	YES	YES	NO
28	110302010	0.49	R-18	MSN	YES	YES	NO
28	110302008	0.49	R-18	MSN	YES	YES	NO
28	110302016	0.49	R-18	MSN	YES	YES	NO
28	110302018	0.49	R-18	MSN	YES	YES	NO
28	110302012	0.49	R-18	MSN	YES	YES	NO
28	110302006	0.49	R-18	MSN	YES	YES	NO
28	110302014	0.49	R-18	MSN	YES	YES	NO
28	110302020	0.49	R-18	MSN	YES	YES	NO
28	110303074	0.47	R-22	MSN	YES	YES	NO
28	110303068	0.47	R-22	MSN	YES	YES	NO
28	110303076	0.47	R-22	MSN	YES	YES	NO
28	110303070	0.47	R-22	MSN	YES	YES	NO
28	110303080	0.47	R-22	MSN	YES	YES	NO
28	110303072	0.47	R-22	MSN	YES	YES	NO
28	110303066	0.47	R-22	MSN	YES	YES	NO
28	110303064	0.47	R-22	MSN	YES	YES	NO
28	110303078	0.47	R-22	MSN	YES	YES	NO
28	110300014	0.60	R-18	MSN	YES	YES	NO
28	110300008	0.60	R-18	MSN	YES	YES	NO
28	110300016	0.60	R-18	MSN	YES	YES	NO
28	110300012	0.60	R-18	MSN	YES	YES	NO
28	110300006	0.60	R-18	MSN	YES	YES	NO
28	110300010	0.60	R-18	MSN	YES	YES	NO
28	110300004	0.60	R-18	MSN	YES	YES	NO
28	110300018	0.60	R-18	MSN	YES	YES	NO
28	110300020	0.60	R-18	MSN	YES	YES	NO
28	110303100	0.49	R-22	MSN	YES	YES	NO
28	110303094	0.49	R-22	MSN	YES	YES	NO

28	110303088	0.49	R-22	MSN	YES	YES	NO
28	110303096	0.49	R-22	MSN	YES	YES	NO
28	110303092	0.49	R-22	MSN	YES	YES	NO
28	110303086	0.49	R-22	MSN	YES	YES	NO
28	110303090	0.49	R-22	MSN	YES	YES	NO
28	110303084	0.49	R-22	MSN	YES	YES	NO
28	110303098	0.49	R-22	MSN	YES	YES	NO
28	110310005	0.78	CC	MU	YES	YES	NO
28	110310002	1.14	CC	MU	YES	YES	NO
28	110390000	1.44	CC	MU	YES	YES	NO
28	110312002	0.66	R-18	MSN	YES	YES	NO
28	110420000	12.28	R-30	MU	YES	YES	NO
28	110462000	2.57	CC	MU	YES	YES	NO
28	110302002	0.49	R-18	MSN	YES	YES	NO
28	110321005	1.25	CC	MU	YES	YES	NO
28	110463000	0.82	CC	MU	YES	YES	NO
28	110381000	0.61	CC	MU	YES	YES	NO
28	110400000	0.66	CC	MU	YES	YES	NO
28	110382000	3.04	CC	MU	YES	YES	NO
28	110303062	0.47	R-22	MSN	YES	YES	NO
28	110460000	0.11	CC	MU	YES	YES	NO
28	110320000	0.78	OCI	MU	YES	YES	NO
28	110300002	0.60	R-18	MSN	YES	YES	NO
28	110395000	0.86	CC	MU	YES	YES	NO
28	110304000	0.60	CC	MU	YES	YES	NO
28	114770000	2.01	CC	MU	YES	YES	NO
28	110304005	1.76	CC	MU	YES	YES	NO
28	110303082	0.49	R-22	MSN	YES	YES	NO
28	110304005	1.76	CC	MU	YES	YES	NO
28	110303082	0.49	R-22	MSN	YES	YES	NO
28	165174010	3.13	CC	MU	YES	YES	NO
28	165175000	1.18	CC	MU	YES	YES	NO
28	165174020	0.82	CC	MU	YES	YES	NO
28	110330000	0.91	OCI	MU	YES	YES	NO
28	986040362	28.58	MX	MU	YES	YES	NO
28	986040361	3.91	MX	MU	YES	YES	NO
28	165174030	2.21	CC	MU	YES	YES	NO
28	986036100	2.50	CC	MU	YES	YES	NO
28	110380000	1.16	CC	MU	YES	YES	NO
28	165174025	0.56	CC	MU	YES	YES	NO
28	165174015	1.50	CC	MU	YES	YES	NO
28	165174005	8.96	CC	MU	YES	YES	NO
28	110321000	3.69	CC	MU	YES	YES	NO
28	110466000	2.79	CC	MU	YES	YES	NO
28	110299916	0.24	R-22	MSN	YES	YES	NO
28	110299914	0.22	R-22	MSN	YES	YES	NO
28	986040360	1.74	MX	MU	YES	YES	NO
29	115062036	1.94	IL	IC	YES	NO	YES
29	115062085	0.13	IL	IC	YES	NO	YES
29	115062050	2.06	IL	IC	YES	NO	YES
29	115062060	0.59	IL	IC	YES	NO	YES
29	115062065	0.59	IL	IC	YES	NO	YES
29	115062055	6.60	IL	IC	YES	NO	YES
29	986032109	22.34	IL	IC	NO	NO	NO
29	115060000	22.34	IL	IC	NO	NO	NO
29	115062080	0.60	IL	IC	YES	NO	YES

29	115068000	0.62	IL	IC	YES	NO	YES
29	114910000	8.84	R-9	RAC	NO	NO	NO
29	114970000	0.62	OCI	RAC	YES	YES	NO
29	114912000	0.34	CC	MU	YES	YES	NO
29	114918000	0.46	CC	RAC	YES	YES	NO
29	986026861	0.88	CC	RAC	YES	YES	NO
29	114914000	1.03	CC	MU	YES	YES	NO
29	115162000	0.90	CC	RAC	YES	YES	NO
29	986031540	0.63	CC	RAC	YES	YES	NO
29	115160000	0.79	CC	RAC	YES	YES	NO
29	986031537	0.43	CC	RAC	YES	YES	NO
29	115163000	4.59	CC	MU	YES	YES	NO
29	115030000	0.82	OCI	RAC	YES	YES	NO
29	115000000	0.80	OCI	RAC	YES	YES	NO
29	114940000	0.65	OCI	RAC	YES	YES	NO
29	115165000	0.67	CC	MU	YES	YES	NO
29	115020000	1.27	OCI		0 YES	YES	NO
29	115010000	7.01	R-30	MU	YES	YES	NO
29	121921000	6.45	CC	MU	YES	YES	NO
29	115161000	1.08	CC	RAC	YES	YES	NO
29	114916000	8.91	CC	MU	YES	YES	NO
29	114960000	0.51	OCI	RAC	YES	YES	NO
29	115164000	1.14	CC	MU	YES	YES	NO
30	30172000	0.23	IL	RAC	YES	NO	YES
30	30209000	0.29	IL	RAC	YES	NO	YES
30	30185000	0.32	IL	RAC	NO	NO	NO
30	30208000	0.18	IL	RAC	YES	NO	YES
30	30183000	0.35	IL	RAC	NO	NO	NO
30	30239075	0.42	IL	RAC	NO	NO	NO
30	30239041	0.46	R-9	MSN	NO	NO	NO
30	30239045	0.15	R-9	MSN	NO	NO	NO
30	30239017	0.17	R-9	MSN	NO	NO	NO
30	30179000	0.19	R-9	MSN	NO	NO	NO
30	30239066	0.29	IL	RAC	NO	NO	NO
30	30178000	0.12	IL	RAC	NO	NO	NO
30	30251344	1.87	R-18	MU	YES	YES	NO
30	30251324	1.87	R-18	MU	YES	YES	NO
30	30251304	1.87	R-18	MU	YES	YES	NO
30	30251310	1.87	R-18	MU	YES	YES	NO
30	30251332	1.87	R-18	MU	YES	YES	NO
30	30251312	1.87	R-18	MU	YES	YES	NO
30	30251298	1.87	R-18	MU	YES	YES	NO
30	30251318	1.87	R-18	MU	YES	YES	NO
30	30251338	1.87	R-18	MU	YES	YES	NO
30	30251326	1.87	R-18	MU	YES	YES	NO
30	30251306	1.87	R-18	MU	YES	YES	NO
30	30251322	1.87	R-18	MU	YES	YES	NO
30	30251328	1.87	R-18	MU	YES	YES	NO
30	30251316	1.87	R-18	MU	YES	YES	NO
30	30251296	1.87	R-18	MU	YES	YES	NO
30	30251302	1.87	R-18	MU	YES	YES	NO
30	30251308	1.87	R-18	MU	YES	YES	NO
30	30251336	1.87	R-18	MU	YES	YES	NO
30	30251342	1.87	R-18	MU	YES	YES	NO

30	30251346	1.87	R-18	MU	YES	YES	NO
30	30251300	1.87	R-18	MU	YES	YES	NO
30	30251340	1.87	R-18	MU	YES	YES	NO
30	30251334	1.87	R-18	MU	YES	YES	NO
30	30251320	1.87	R-18	MU	YES	YES	NO
30	30251314	1.87	R-18	MU	YES	YES	NO
30	30251294	1.87	R-18	MU	YES	YES	NO
30	30251330	1.87	R-18	MU	YES	YES	NO
30	986055885	0.08	R-22	MSN	YES	YES	NO
30	29473014	0.08	R-22	MSN	YES	YES	NO
30	29473020	0.14	R-22	MSN	YES	YES	NO
30	29473018	0.08	R-22	MSN	YES	YES	NO
30	29462030	0.15	R-22	MSN	YES	YES	NO
30	29462025	0.10	R-22	MSN	YES	YES	NO
30	29467074	0.34	R-22	MSN	YES	YES	NO
30	30251292	1.87	R-18	MU	YES	YES	NO
30	29462000	0.10	R-22	MSN	YES	YES	NO
30	30790306	0.20	R-18	MU	YES	YES	NO
30	29462020	0.08	R-22	MSN	YES	YES	NO
30	30243010	3.70	CG	MU	YES	YES	NO
30	29379002	0.59	R-22	MU	YES	YES	NO
30	29467080	0.36	CG	RAC	YES	YES	NO
30	30239016	0.92	CC	RAC	YES	YES	NO
30	29473015	0.08	R-22	MSN	YES	YES	NO
30	29473019	0.08	R-22	MSN	YES	YES	NO
30	29462010	0.08	R-22	MSN	YES	YES	NO
30	29462005	0.08	R-22	MSN	YES	YES	NO
30	30790012	0.21	R-18	MU	YES	YES	NO
30	29462015	0.08	R-22	MSN	YES	YES	NO
30	29464060	0.37	R-22	MSN	YES	YES	NO
30	29467081	0.28	R-22	MSN	YES	YES	NO
30	30239065	0.47	CC	RAC	YES	YES	NO
30	30224000	0.12	R-18	MSN	YES	YES	NO
30	29455054	0.81	CG	RAC	YES	YES	NO
30	29467075	0.22	CG	RAC	YES	YES	NO
30	29472007	0.18	CG	RAC	YES	YES	NO
30	30225000	0.14	R-18	MSN	YES	YES	NO
30	30243030	0.40	CG	RAC	YES	YES	NO
30	30239034	0.68	R-18	MSN	YES	YES	NO
31	37912656	0.24	R-9	LSN	YES	NO	YES
31	37912655	0.25	R-9	LSN	YES	NO	YES
31	37912659	2.14	R-9	MSN	YES	NO	YES
31	37912660	0.25	R-9	MSN	YES	NO	YES
31	37912661	0.24	R-9	MSN	YES	NO	YES
31	37912662	0.23	R-9	MSN	YES	NO	YES
31	37912620	0.29	R-6	MSN	YES	NO	YES
31	37912616	0.28	R-6	MSN	YES	NO	YES
31	37912617	0.24	R-6	MSN	YES	NO	YES
31	37912618	0.24	R-6	MSN	YES	NO	YES
31	37912619	0.27	R-6	MSN	YES	NO	YES
31	37912663	0.23	R-9	MSN	YES	NO	YES
31	37912671	0.25	R-6	MSN	YES	NO	YES
31	37912664	0.23	R-9	MSN	YES	NO	YES
31	37912672	0.27	R-6	MSN	YES	NO	YES

31	37912665	0.23	R-9	MSN	YES	NO	YES
31	37912666	0.24	R-9	MSN	YES	NO	YES
31	37912623	1.20	Park	UNA	NO	NO	NO
31	37912621	0.41	R-6	UNA	NO	NO	NO
31	36359206	0.60	R-6	LSN	NO	NO	NO
31	36359216	0.62	R-6	LSN	NO	NO	NO
31	37912684	0.28	R-6	LSN	NO	NO	NO
31	36359208	0.35	R-6	LSN	NO	NO	NO
31	36359244	0.32	R-6	LSN	NO	NO	NO
31	37912669	0.29	R-6	LSN	NO	NO	NO
31	36359288	0.30	R-9	LSN	NO	NO	NO
31	37912680	0.28	R-6	LSN	NO	NO	NO
31	37912685	0.26	R-6	LSN	NO	NO	NO
31	36359212	0.30	R-6	LSN	NO	NO	NO
31	36359290	0.32	R-9	LSN	NO	NO	NO
31	37912686	0.24	R-6	LSN	NO	NO	NO
31	37912689	0.25	R-6	LSN	NO	NO	NO
31	37912657	0.24	R-9	LSN	NO	NO	NO
31	37912658	0.25	R-9	LSN	NO	NO	NO
31	37912688	0.23	R-6	LSN	NO	NO	NO
31	37912690	0.24	R-6	LSN	NO	NO	NO
31	37912691	0.26	R-6	LSN	NO	NO	NO
31	37912696	0.31	R-6	LSN	NO	NO	NO
31	37912695	0.26	R-6	LSN	NO	NO	NO
31	37912694	0.25	R-6	LSN	NO	NO	NO
31	37912622	0.85	Park	UNA	NO	NO	NO
31	37912683	0.29	R-6	LSN	NO	NO	NO
31	36359246	0.23	R-6	LSN	NO	NO	NO
31	37912670	0.24	R-6	LSN	NO	NO	NO
31	36359210	0.34	R-6	LSN	NO	NO	NO
31	36359214	0.29	R-6	LSN	NO	NO	NO
31	37912687	0.21	R-6	LSN	NO	NO	NO
31	37910012	0.19	R-9	MSN	NO	NO	NO
31	37910014	5.32	R-9	MSN	NO	NO	NO
31	36359286	0.29	R-9	LSN	NO	NO	NO
31	37912615	7.45	GW	UNA	NO	NO	NO
31	37912681	0.23	R-6	LSN	NO	NO	NO
31	36359174	11.39	GW	UNA	NO	NO	NO
31	37909805	50.89	Park	POS	NO	NO	NO
31	986035736	1.55	HX	RAC	YES	YES	NO
31	37910149	0.67	HX	RAC	YES	YES	NO
31	37910150	0.51	HX	RAC	YES	YES	NO
31	37910152	0.14	HX	RAC	YES	YES	NO
31	37910131	0.20	HX	RAC	YES	YES	NO
31	37910163	1.55	HX	RAC	YES	YES	NO
31	37910151	0.39	HX	RAC	YES	YES	NO
31	37910164	0.78	HX	RAC	YES	YES	NO
31	36359292	1.48	HX	RAC	YES	YES	NO
31	37910109	2.17	HX	RAC	YES	YES	NO
31	37910148	11.43	HX	RAC	YES	YES	NO
32	37911770	1.50	R-4	MU	YES	NO	YES
32	37911769	0.28	R-4	MSN	YES	NO	YES
32	37912115	0.38	R-6	MU	YES	NO	YES
32	37912114	0.23	R-6	MU	YES	NO	YES

32	37912116	0.27	R-6	MU	YES	NO	YES
32	37912113	0.22	R-6	MU	YES	NO	YES
32	37912112	0.25	R-6	MU	YES	NO	YES
32	37912117	0.23	R-6	MU	YES	NO	YES
32	37912118	0.24	R-6	MU	YES	NO	YES
32	37912119	0.23	R-6	MU	YES	NO	YES
32	37912120	0.23	R-6	MU	YES	NO	YES
32	37911773	0.24	R-4	MU	YES	NO	YES
32	37912030	0.27	R-6	MSN	YES	NO	YES
32	37912121	0.23	R-6	MU	YES	NO	YES
32	37912798	0.24	R-6	MSN	YES	NO	YES
32	37911768	0.25	R-4	MSN	YES	NO	YES
32	37911774	0.24	R-4	MU	YES	NO	YES
32	37912031	0.24	R-6	MSN	YES	NO	YES
32	37911767	0.25	R-4	MSN	YES	NO	YES
32	37912122	0.23	R-6	MU	YES	NO	YES
32	37912797	0.22	R-6	MSN	YES	NO	YES
32	37911775	0.26	R-4	MU	YES	NO	YES
32	37912032	0.27	R-6	MSN	YES	NO	YES
32	37911766	0.25	R-4	MSN	YES	NO	YES
32	37912123	0.27	R-6	MU	YES	NO	YES
32	37911765	0.26	R-4	MSN	YES	NO	YES
32	37912033	0.30	R-6	MSN	YES	NO	YES
32	37912654	0.31	R-6	MSN	YES	NO	YES
32	37911796	0.25	R-4	MSN	YES	NO	YES
32	37911764	0.26	R-4	MSN	YES	NO	YES
32	37912653	0.35	R-6	MSN	YES	NO	YES
32	37912034	0.35	R-6	MSN	YES	NO	YES
32	37911813	0.22	R-4	MSN	YES	NO	YES
32	37912777	0.22	R-6	LSN	NO	NO	NO
32	37912778	0.22	R-6	LSN	NO	NO	NO
32	37912794	0.21	R-6	LSN	NO	NO	NO
32	37912795	0.23	R-6	LSN	NO	NO	NO
32	37912796	0.23	R-6	LSN	NO	NO	NO
32	37912803	0.22	R-6	LSN	NO	NO	NO
32	37912800	0.23	R-6	LSN	NO	NO	NO
32	37912776	0.25	R-6	LSN	NO	NO	NO
32	37912792	0.21	R-6	LSN	NO	NO	NO
32	37912793	0.21	R-6	LSN	NO	NO	NO
32	37912804	0.22	R-6	LSN	NO	NO	NO
32	37912802	0.22	R-6	LSN	NO	NO	NO
32	37912801	0.22	R-6	LSN	NO	NO	NO
32	37912799	0.23	R-6	LSN	NO	NO	NO
32	37912806	0.24	R-6	LSN	NO	NO	NO
32	37912098	0.25	R-6	LSN	NO	NO	NO
32	37912104	0.27	R-6	LSN	NO	NO	NO
32	37912101	0.26	R-6	LSN	NO	NO	NO
32	37912094	0.25	R-6	LSN	NO	NO	NO
32	37912075	0.27	R-6	LSN	NO	NO	NO
32	37912105	0.23	R-6	LSN	NO	NO	NO
32	37912100	0.26	R-6	LSN	NO	NO	NO
32	37912093	0.25	R-6	LSN	NO	NO	NO
32	37912092	0.23	R-6	LSN	NO	NO	NO
32	37912097	0.25	R-6	LSN	NO	NO	NO

32	37912805	0.22	R-6	LSN	NO	NO	NO
32	37912099	0.26	R-6	LSN	NO	NO	NO
32	37912107	0.23	R-6	LSN	NO	NO	NO
32	37912106	0.23	R-6	LSN	NO	NO	NO
32	37912090	0.23	R-6	LSN	NO	NO	NO
32	37912095	0.28	R-6	LSN	NO	NO	NO
32	37912089	0.26	R-6	LSN	NO	NO	NO
32	37912110	0.23	R-6	LSN	NO	NO	NO
32	37912109	0.23	R-6	LSN	NO	NO	NO
32	37912108	0.23	R-6	LSN	NO	NO	NO
32	37912102	0.26	R-6	LSN	NO	NO	NO
32	37912096	0.25	R-6	LSN	NO	NO	NO
32	37912091	0.22	R-6	LSN	NO	NO	NO
32	37910304	65.66	Park	POS	NO	NO	NO
32	37912087	0.24	R-6	LSN	NO	NO	NO
32	37912076	0.23	R-6	LSN	NO	NO	NO
32	37912081	0.27	R-6	LSN	NO	NO	NO
32	37912085	0.24	R-6	LSN	NO	NO	NO
32	37912082	0.32	R-6	LSN	NO	NO	NO
32	37912083	0.22	R-6	LSN	NO	NO	NO
32	37912084	0.28	R-6	LSN	NO	NO	NO
32	37912086	0.23	R-6	LSN	NO	NO	NO
32	37912111	0.29	R-6	LSN	NO	NO	NO
32	37912061	0.30	R-6	LSN	NO	NO	NO
32	37909803	3.88	HX	RAC	YES	YES	NO
32	37910009	1.98	R-18	MU	YES	YES	NO
32	37909800	0.43	HX	RAC	YES	YES	NO
32	37912818	0.21	R-18	MSN	YES	YES	NO
32	37912815	0.38	R-18	MSN	YES	YES	NO
32	37912817	0.18	R-18	MSN	YES	YES	NO
32	37912812	0.30	R-18	MSN	YES	YES	NO
32	37912813	0.33	R-18	MSN	YES	YES	NO
32	37910023	0.25	HX	RAC	YES	YES	NO
32	37910019	0.29	HX	RAC	YES	YES	NO
32	37910018	0.53	HX	RAC	YES	YES	NO
32	37910020	2.39	HX	RAC	YES	YES	NO
32	37909802	3.88	HX	RAC	YES	YES	NO
32	37910016	3.18	HX	RAC	YES	YES	NO
32	986036371	13.53	R-18	MSN	YES	YES	NO
32	986036372	0.48	R-18	MSN	YES	YES	NO
33	29380000	3.77	IL	RAC	YES	NO	YES
33	29455000	0.90	IL	IE	YES	NO	YES
33	161879000	2.43	IL	IE	NO	NO	NO
33	29435000	1.94	IL	IE	NO	NO	NO
33	161904000	0.40	IL	IE	YES	NO	YES
33	29440000	0.97	IL	IE	NO	NO	NO
33	161881000	0.62	IL	IE	NO	NO	NO
33	29445000	1.68	IL	IE	NO	NO	NO
33	161901000	0.29	IL	IE	NO	NO	NO
33	29430000	4.13	IL	IE	NO	NO	NO
33	161878000	0.92	IL	IE	NO	NO	NO

33	108806000	3.34	Park	POS	NO	NO	NO
33	986049409	1.16	CC	RAC	YES	YES	NO
33	109585022	0.40	R-30	MSN	YES	YES	NO
33	109585021	0.15	R-30	MSN	YES	YES	NO
33	109585019	0.17	R-30	MSN	YES	YES	NO
33	109585026	0.27	R-30	MSN	YES	YES	NO
33	109585020	0.15	R-30	MSN	YES	YES	NO
33	108831000	1.04	R-30	MU	YES	YES	NO
33	108851000	1.18	CG	RAC	YES	YES	NO
33	109585024	0.27	R-30	MSN	YES	YES	NO
33	109585028	0.28	R-30	MSN	YES	YES	NO
33	108832000	0.49	R-30	MU	YES	YES	NO
33	108842000	0.70	R-30	RAC	YES	YES	NO
33	109585018	0.36	R-30	MU	YES	YES	NO
33	160453002	0.46	CC		0 YES	YES	NO
33	161446000	1.28	R-30	MSN	YES	YES	NO
33	109585016	0.35	R-30	MU	YES	YES	NO
33	108841000	0.67	R-30	RAC	YES	YES	NO
33	109585014	0.32	R-30	MU	YES	YES	NO
33	109585012	0.18	R-30	MU	YES	YES	NO
33	109585011	0.17	R-30	MU	YES	YES	NO
33	109585008	0.33	R-30	MU	YES	YES	NO
33	161447000	1.38	R-30	MSN	YES	YES	NO
33	108811000	1.34	R-30	MU	YES	YES	NO
33	109585010	0.17	R-30	MSN	YES	YES	NO
33	109585004	0.49	CC	RAC	YES	YES	NO
33	108843000	0.66	R-30	RAC	YES	YES	NO
33	108840000	1.66	CC	RAC	YES	YES	NO
33	109585009	0.33	R-30	MU	YES	YES	NO
33	161896000	0.40	CG	RAC	YES	YES	NO
33	161899000	2.21	CG	RAC	YES	YES	NO
33	986031613	1.04	CG	RAC	YES	YES	NO
33	161899015	1.66	CG	RAC	YES	YES	NO
33	29460000	0.82	CC	RAC	YES	YES	NO
33	29450000	1.16	CC	RAC	YES	YES	NO
33	161899010	0.76	CG	RAC	YES	YES	NO
33	109586014	0.20	R-30	MU	YES	YES	NO
33	109586012	0.23	R-30	MU	YES	YES	NO
33	109585007	0.38	R-30	MU	YES	YES	NO
33	161451000	3.00	CG	RAC	YES	YES	NO
33	161444000	0.93	R-30	RAC	YES	YES	NO
33	109585002	0.45	CG	RAC	YES	YES	NO
33	161445000	0.90	R-30	RAC	YES	YES	NO
34	108493384	0.20	R-6	MSN	YES	NO	YES
34	108493332	0.20	R-6	MSN	YES	NO	YES
34	108493334	0.17	R-6	MSN	YES	NO	YES
34	108493352	0.20	R-6	MSN	YES	NO	YES
34	108493354	0.18	R-6	MSN	YES	NO	YES
34	108493330	0.20	R-6	MSN	YES	NO	YES
34	108493356	0.17	R-6	MSN	YES	NO	YES
34	108493336	0.17	R-6	MSN	YES	NO	YES
34	108493328	0.17	R-6	MSN	YES	NO	YES
34	108493358	0.18	R-6	MSN	YES	NO	YES
34	108493338	0.17	R-6	MSN	YES	NO	YES

34	108493326	0.17 R-6	MSN	YES	NO	YES
34	108493242	0.21 R-6	MSN	YES	NO	YES
34	108493244	0.21 R-6	MSN	YES	NO	YES
34	108493360	0.19 R-6	MSN	YES	NO	YES
34	108493240	0.21 R-6	MSN	YES	NO	YES
34	108493238	0.19 R-6	MSN	YES	NO	YES
34	108493340	0.17 R-6	MSN	YES	NO	YES
34	108493324	0.18 R-6	MSN	YES	NO	YES
34	108493266	0.19 R-6	MSN	YES	NO	YES
34	108493236	0.19 R-6	MSN	YES	NO	YES
34	108493268	0.17 R-6	MSN	YES	NO	YES
34	108493362	0.18 R-6	MSN	YES	NO	YES
34	108493204	0.19 R-6	MSN	YES	NO	YES
34	108493264	0.19 R-6	MSN	YES	NO	YES
34	108493322	0.17 R-6	MSN	YES	NO	YES
34	108493342	0.17 R-6	MSN	YES	NO	YES
34	108493234	0.19 R-6	MSN	YES	NO	YES
34	108493270	0.17 R-6	MSN	YES	NO	YES
34	108493262	0.17 R-6	MSN	NO	NO	NO
34	108493364	0.17 R-6	MSN	NO	NO	NO
34	108493260	0.17 R-6	MSN	NO	NO	NO
34	108493320	0.17 R-6	MSN	NO	NO	NO
34	108493272	0.18 R-6	MSN	NO	NO	NO
34	108493232	0.19 R-6	MSN	NO	NO	NO
34	108493344	0.17 R-6	MSN	NO	NO	NO
34	108493258	0.18 R-6	MSN	NO	NO	NO
34	108493366	0.20 R-6	MSN	NO	NO	NO
34	108493370	0.26 R-6	MSN	NO	NO	NO
34	108493274	0.17 R-6	MSN	NO	NO	NO
34	108493318	0.18 R-6	MSN	NO	NO	NO
34	108493230	0.19 R-6	MSN	NO	NO	NO
34	108493346	0.17 R-6	MSN	NO	NO	NO
34	108493256	0.17 R-6	MSN	NO	NO	NO
34	108493368	0.26 R-6	MSN	NO	NO	NO
34	108493276	0.17 R-6	MSN	NO	NO	NO
34	108493316	0.17 R-6	MSN	NO	NO	NO
34	108493228	0.22 R-6	MSN	NO	NO	NO
34	108493350	0.19 R-6	MSN	NO	NO	NO
34	108493254	0.18 R-6	MSN	NO	NO	NO
34	108493348	0.17 R-6	MSN	NO	NO	NO
34	108493278	0.18 R-6	MSN	NO	NO	NO
34	108493226	0.26 R-6	MSN	NO	NO	NO
34	108493314	0.17 R-6	MSN	NO	NO	NO
34	108493252	0.18 R-6	MSN	NO	NO	NO
34	108493312	0.20 R-6	MSN	NO	NO	NO
34	108493388	0.17 R-6	MSN	NO	NO	NO
34	108493390	0.17 R-6	MSN	NO	NO	NO
34	108493280	0.18 R-6	MSN	NO	NO	NO
34	108493250	0.18 R-6	MSN	NO	NO	NO
34	108493392	0.20 R-6	MSN	NO	NO	NO
34	108493282	0.17 R-6	MSN	NO	NO	NO
34	108493248	0.17 R-6	MSN	NO	NO	NO
34	108493394	0.21 R-6	MSN	NO	NO	NO
34	108493284	0.20 R-6	MSN	NO	NO	NO

34	108493246	0.21	R-6	MSN	NO	NO	NO
34	108493144	0.18	R-6	MSN	NO	NO	NO
34	160542000	8.52	Park	POS	NO	NO	NO
34	108493142	0.18	R-6	MSN	NO	NO	NO
34	108493146	0.18	R-6	MSN	NO	NO	NO
34	108493310	0.19	R-6	MSN	NO	NO	NO
34	108493308	0.19	R-6	MSN	NO	NO	NO
34	105529480	4.14	R-22	MSN	YES	YES	NO
34	160262000	1.09	CG	MU	YES	YES	NO
34	108141474	0.63	CC	MU	YES	YES	NO
34	160260006	0.55	CC	MU	YES	YES	NO
34	160260010	0.43	CG	MU	YES	YES	NO
34	160252000	0.54	R-22	MSN	YES	YES	NO
34	160259015	0.48	CC	MU	YES	YES	NO
34	160259020	0.52	CC	MU	YES	YES	NO
34	160259025	1.03	CC	MU	YES	YES	NO
34	108141480	0.81	CG	MU	YES	YES	NO
34	108141482	1.21	CG	MU	YES	YES	NO
34	160259000	1.96	CC	MU	YES	YES	NO
34	108141472	0.90	CC	MU	YES	YES	NO
34	108141478	2.08	CG	MU	YES	YES	NO
35	37912183	0.32	R-9	MU	YES	NO	YES
35	37911521	0.25	R-4	MSN	YES	NO	YES
35	37912176	0.27	R-9	MU	YES	NO	YES
35	37911085	0.23	R-4	MU	YES	NO	YES
35	37911109	0.23	R-4	MU	YES	NO	YES
35	37911086	0.18	R-4	MU	YES	NO	YES
35	37911108	0.20	R-4	MU	YES	NO	YES
35	37911087	0.18	R-4	MU	YES	NO	YES
35	37912182	0.28	R-9	MU	YES	NO	YES
35	37911107	0.19	R-4	MU	YES	NO	YES
35	37911088	0.19	R-4	MU	YES	NO	YES
35	37912181	0.28	R-9	MU	YES	NO	YES
35	37911106	0.19	R-4	MU	YES	NO	YES
35	37911089	0.20	R-4	MU	YES	NO	YES
35	37911105	0.19	R-4	MU	YES	NO	YES
35	37912180	0.28	R-9	MU	YES	NO	YES
35	37911090	0.21	R-4	MU	YES	NO	YES
35	37911104	0.21	R-4	MU	YES	NO	YES
35	37911091	0.22	R-4	MU	YES	NO	YES
35	37912179	0.28	R-9	MU	YES	NO	YES
35	37911103	0.23	R-4	MU	NO	NO	NO
35	37911092	0.23	R-4	MU	NO	NO	NO
35	37912178	0.27	R-9	MU	NO	NO	NO
35	37911102	0.27	R-4	MU	NO	NO	NO
35	37911502	0.25	R-4	MSN	NO	NO	NO
35	37911093	0.26	R-4	MU	NO	NO	NO
35	37911101	0.26	R-4	MU	NO	NO	NO
35	37912177	0.27	R-9	MU	NO	NO	NO
35	37911503	0.22	R-4	MSN	NO	NO	NO
35	37911094	0.28	R-4	MU	NO	NO	NO
35	37911100	0.23	R-4	MU	NO	NO	NO
35	37911520	0.22	R-4	MSN	NO	NO	NO
35	37911504	0.23	R-4	MSN	NO	NO	NO

35	37911095	0.26	R-4	MU	NO	NO	NO
35	37911519	0.22	R-4	MSN	NO	NO	NO
35	37911505	0.23	R-4	MSN	NO	NO	NO
35	37911518	0.22	R-4	MSN	NO	NO	NO
35	37911506	0.22	R-4	MSN	NO	NO	NO
35	37912168	0.23	R-9	LSN	NO	NO	NO
35	37912160	0.24	R-6	LSN	NO	NO	NO
35	37912173	0.22	R-9	LSN	NO	NO	NO
35	37912159	0.24	R-6	LSN	NO	NO	NO
35	37912059	0.29	R-6	LSN	NO	NO	NO
35	37912158	0.25	R-6	LSN	NO	NO	NO
35	37912169	0.21	R-9	LSN	NO	NO	NO
35	37912172	0.20	R-9	LSN	NO	NO	NO
35	37912166	0.24	R-6	LSN	NO	NO	NO
35	37912161	0.24	R-6	LSN	NO	NO	NO
35	37912164	0.24	R-6	LSN	NO	NO	NO
35	37912157	0.23	R-6	LSN	NO	NO	NO
35	37912060	0.36	R-6	LSN	NO	NO	NO
35	37911550	0.23	R-4	MSN	NO	NO	NO
35	37911571	0.29	R-4	MSN	NO	NO	NO
35	37912170	0.25	R-9	LSN	NO	NO	NO
35	37912171	0.22	R-9	LSN	NO	NO	NO
35	37912165	0.24	R-6	LSN	NO	NO	NO
35	37912167	0.27	R-9	LSN	NO	NO	NO
35	37912174	0.27	R-9	LSN	NO	NO	NO
35	37911557	0.22	R-9	MSN	NO	NO	NO
35	37911551	0.22	R-9	MSN	NO	NO	NO
35	37911566	0.26	R-4	MSN	NO	NO	NO
35	37911551	0.22	R-9	MSN	NO	NO	NO
35	37911566	0.26	R-4	MSN	NO	NO	NO
35	37911556	0.23	R-9	MSN	NO	NO	NO
35	37911563	0.21	R-4	MSN	NO	NO	NO
35	37911568	0.25	R-4	MSN	NO	NO	NO
35	37911553	0.23	R-9	MSN	NO	NO	NO
35	37911564	0.21	R-4	MSN	NO	NO	NO
35	37911570	0.29	R-4	MSN	NO	NO	NO
35	37912058	0.31	R-6	LSN	NO	NO	NO
35	37912163	0.29	R-6	LSN	NO	NO	NO
35	37911567	0.26	R-4	MSN	NO	NO	NO
35	37911552	0.22	R-9	MSN	NO	NO	NO
35	37911554	0.22	R-9	MSN	NO	NO	NO
35	37911593	0.26	R-4	MSN	NO	NO	NO
35	37911572	0.25	R-4	MSN	NO	NO	NO
35	37912162	0.28	R-6	LSN	NO	NO	NO
35	37911569	0.21	R-4	MSN	NO	NO	NO
35	37911565	0.25	R-4	MSN	NO	NO	NO
35	37911555	0.23	R-9	MSN	NO	NO	NO
35	37911562	0.21	R-4	MSN	NO	NO	NO
35	37917909	2.40	R-18	MSN	YES	YES	NO
35	37910307	0.39	CC	MU	YES	YES	NO
35	37910311	0.35	CC	MU	YES	YES	NO
35	37911729	0.72	CC	MU	YES	YES	NO
35	37911727	0.68	CC	MU	YES	YES	NO
35	37910310	0.33	CC	MU	YES	YES	NO
35	111015040	0.19	CC	IC	YES	YES	NO
35	111015080	0.20	R-30	MSN	YES	YES	NO

35	111015090	0.20	R-30	MSN	YES	YES	NO
35	111015020	0.17	CC	IC	YES	YES	NO
35	111015050	0.19	CC	IC	YES	YES	NO
35	37910309	0.07	CC	MU	YES	YES	NO
35	37911728	0.33	CC	MU	YES	YES	NO
35	37910432	0.34	CC	MU	YES	YES	NO
35	37911742	0.27	CC	MU	YES	YES	NO
35	111015150	0.25	R-30	MSN	YES	YES	NO
35	111015130	0.20	R-30	MSN	YES	YES	NO
35	111015220	0.25	R-30	MSN	YES	YES	NO
35	111015160	0.20	R-30	MSN	YES	YES	NO
35	37911725	0.31	CC	MU	YES	YES	NO
35	111015010	0.11	CC	IC	YES	YES	NO
35	37910306	0.49	CC	MU	YES	YES	NO
35	37917903	5.78	CC	MU	YES	YES	NO
35	111015140	0.26	R-30	MSN	YES	YES	NO
35	111015070	0.26	R-30	MSN	YES	YES	NO
35	37911732	10.55	R-18	MSN	YES	YES	NO
35	37917907	2.64	R-18	MU	YES	YES	NO
35	37917910	2.41	R-18	MSN	YES	YES	NO
35	37917901	0.36	R-18	MSN	YES	YES	NO
35	986060363	0.67	CC	MU	YES	YES	NO
35	37911726	0.36	CC	MU	YES	YES	NO
35	37911731	0.45	CC	MU	YES	YES	NO
35	37917905	1.62	R-18	MSN	YES	YES	NO
35	37910308	0.30	CC	MU	YES	YES	NO
35	37911730	0.60	CC	MU	YES	YES	NO
35	111015060	0.19	CC	IC	YES	YES	NO
36	37910966	0.18	R-4	MU	YES	NO	YES
36	37916011	0.17	R-6	MSN	YES	NO	YES
36	37916009	0.17	R-6	MSN	YES	NO	YES
36	37916023	0.17	R-6	MSN	YES	NO	YES
36	37916021	0.17	R-6	MSN	YES	NO	YES
36	37916019	0.17	R-6	MSN	YES	NO	YES
36	37910835	0.15	R-4	MU	YES	NO	YES
36	37910834	0.15	R-4	MU	YES	NO	YES
36	37916017	0.17	R-6	MSN	YES	NO	YES
36	37916015	0.18	R-6	MSN	NO	NO	NO
36	37910967	0.18	R-4	MU	NO	NO	NO
36	37910968	0.18	R-4	MU	NO	NO	NO
36	37916013	0.17	R-6	MSN	NO	NO	NO
36	37910833	0.15	R-4	MSN	YES	NO	YES
36	37910832	0.15	R-4	MSN	NO	NO	NO
36	37910831	0.15	R-4	MSN	NO	NO	NO
36	37910973	0.24	R-4	MU	NO	NO	NO
36	37910974	0.19	R-4	MU	NO	NO	NO
36	37910830	0.15	R-4	MSN	NO	NO	NO
36	37910975	0.19	R-4	MU	NO	NO	NO
36	37910829	0.15	R-4	MSN	NO	NO	NO
36	37910828	0.15	R-4	MSN	NO	NO	NO
36	37910969	0.18	R-4	MSN	NO	NO	NO
36	37910827	0.15	R-4	MSN	NO	NO	NO
36	37910970	0.18	R-4	MSN	NO	NO	NO
36	37910971	0.18	R-4	MSN	NO	NO	NO

36	37910826	0.15	R-4	MSN	NO	NO	NO
36	37910972	0.22	R-4	MSN	NO	NO	NO
36	37910825	0.15	R-4	MSN	NO	NO	NO
36	37911048	0.28	R-4	MSN	NO	NO	NO
36	37910824	0.15	R-4	MSN	NO	NO	NO
36	37911049	0.36	R-4	MSN	NO	NO	NO
36	37910976	0.19	R-4	MSN	NO	NO	NO
36	37910977	0.19	R-4	MSN	NO	NO	NO
36	37910978	0.19	R-4	MSN	NO	NO	NO
36	37910979	0.19	R-4	MSN	NO	NO	NO
36	37910980	0.20	R-4	MSN	NO	NO	NO
36	986035261	0.85	CC	IC	YES	YES	NO
36	986031869	1.93	OCI	IC	YES	YES	NO
36	37916038	0.20	CC	MU	YES	YES	NO
36	986056533	0.09	R-18	MSN	YES	YES	NO
36	986043364	0.12	R-18	MSN	YES	YES	NO
36	986043363	0.12	R-18	MSN	YES	YES	NO
36	986027581	0.40	R-18	MSN	YES	YES	NO
36	986027582	0.40	R-18	MSN	YES	YES	NO
36	166202002	1.52	OCI	IC	YES	YES	NO
36	166202001	1.52	OCI	IC	YES	YES	NO
36	166202003	1.52	OCI	IC	YES	YES	NO
36	110892000	0.85	CC	IC	YES	YES	NO
36	110893000	0.22	CC	IC	YES	YES	NO
36	110810000	0.58	CC	IC	YES	YES	NO
36	166203000	1.93	OCI	IC	YES	YES	NO
36	37910836	0.16	CC	MU	YES	YES	NO
36	111018016	0.27	OCI	IC	YES	YES	NO
36	110818000	0.54	CC	IC	YES	YES	NO
36	37916053	0.23	R-18	MSN	YES	YES	NO
36	37916031	0.16	CC	MU	YES	YES	NO
36	37916047	0.17	R-18	MU	YES	YES	NO
36	37916083	0.19	R-18	MSN	YES	YES	NO
36	110782000	0.53	CC	IC	YES	YES	NO
36	37916039	0.17	CC	MU	YES	YES	NO
36	37916043	0.13	R-18	MU	YES	YES	NO
36	111018018	0.29	OCI	IC	YES	YES	NO
36	110786000	0.12	CC	IC	YES	YES	NO
36	37916025	0.17	OCI	MSN	YES	YES	NO
36	37916063	0.18	R-18	MSN	YES	YES	NO
36	37916035	0.20	CC	MU	YES	YES	NO
36	37916101	1.36	R-18	MSN	YES	YES	NO
36	37916075	0.98	R-18	MSN	YES	YES	NO
36	37916033	0.16	CC	MU	YES	YES	NO
36	111018014	0.28	OCI	IC	YES	YES	NO
36	111018010	0.40	OCI	IC	YES	YES	NO
36	111018015	0.28	OCI	IC	YES	YES	NO
36	110781000	0.63	CC	IC	YES	YES	NO
36	110819011	1.29	CC	IC	YES	YES	NO
36	37916051	0.11	R-18	MSN	YES	YES	NO
36	37916045	0.17	R-18	MU	YES	YES	NO
36	37916057	0.27	R-18	MSN	YES	YES	NO
36	37916059	0.36	R-18	MSN	YES	YES	NO
36	986029224	0.05	R-18	MSN	YES	YES	NO

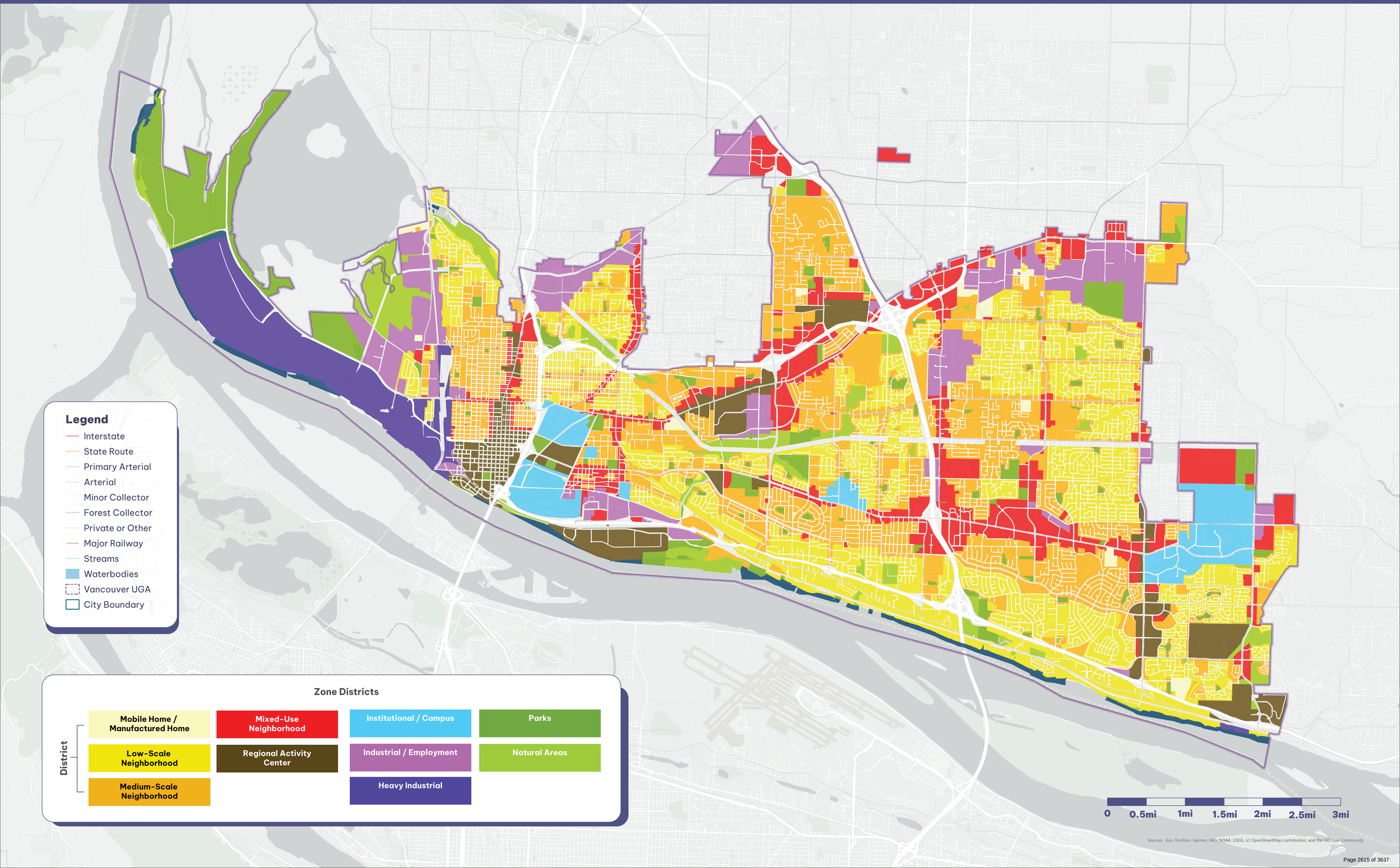
36	110794005	0.45	CC	IC	YES	YES	NO
36	986056532	0.09	R-18	MSN	YES	YES	NO
36	986043362	0.12	R-18	MSN	YES	YES	NO
36	986027580	0.40	R-18	MSN	YES	YES	NO
36	37916087	0.54	R-18	MSN	YES	YES	NO
36	110792000	0.19	R-18	MSN	YES	YES	NO
36	110784000	0.65	CC	IC	YES	YES	NO
36	110785000	0.14	OCI	IC	YES	YES	NO
36	37916077	1.24	R-18	MSN	YES	YES	NO
36	37923173	5.91	OCI	IC	YES	YES	NO
36	110787000	1.07	OCI	IC	YES	YES	NO
36	37910965	0.14	CC	MU	YES	YES	NO
36	37916041	0.17	R-18	MU	YES	YES	NO
36	37916049	0.11	R-18	MSN	YES	YES	NO
36	111018022	0.17	OCI	IC	YES	YES	NO
36	37910837	0.19	CC	MU	YES	YES	NO
36	166202000	1.52	OCI	IC	YES	YES	NO
36	110794004	2.99	OCI	IC	YES	YES	NO
36	110780000	0.54	CC	IC	YES	YES	NO
36	37916037	0.17	CC	MU	YES	YES	NO
37	986035757	9.12	IL	IC	NO	NO	NO
37	986035756	3.79	IL	IC	YES	NO	YES
37	176605000	11.41	IL	IC	NO	NO	NO
37	986038587	1.21	IL	IC	YES	NO	YES
37	986033973	3.68	MX	IC	YES	YES	NO
37	986038586	0.01	MX	IC	YES	YES	NO
37	176609000	9.44	MX	IC	YES	YES	NO
37	176611000	5.81	MX	IC	YES	YES	NO
37	176617000	5.73	MX	IC	YES	YES	NO
37	986035426	1.38	MX	IC	YES	YES	NO
37	176628001	22.65	MX	IC	YES	YES	NO
37	986035427	3.63	MX	IC	YES	YES	NO
37	986035428	4.88	MX	IC	YES	YES	NO
37	986030486	3.20	MX	IC	YES	YES	NO
37	176595000	13.45	MX	IC	YES	YES	NO
37	986045695	4.94	MX	IC	YES	YES	NO
38	986059927	0.44	R-6	MSN	YES	NO	YES
38	110025000	0.44	R-6	MSN	YES	NO	YES
38	110071000	0.62	R-6	MSN	YES	NO	YES
38	110062000	0.78	R-6	MSN	NO	NO	NO
38	110084003	0.33	R-6	MSN	NO	NO	NO
38	110081000	0.31	R-6	MSN	NO	NO	NO
38	110080000	0.47	R-6	MSN	NO	NO	NO
38	110084002	0.30	R-6	MSN	NO	NO	NO
38	110079000	0.24	R-6	MSN	NO	NO	NO
38	110026000	0.23	R-6	MSN	NO	NO	NO
38	110084001	0.19	R-6	MSN	YES	NO	YES
38	110077000	0.28	R-6	MSN	NO	NO	NO
38	110036000	0.31	R-6	MSN	NO	NO	NO
38	110083000	0.19	R-6	MSN	NO	NO	NO
38	110030000	0.54	R-6	MSN	NO	NO	NO
38	110085690	0.19	R-6	MSN	NO	NO	NO
38	110085680	0.19	R-6	MSN	NO	NO	NO
38	110035000	0.84	R-6	MSN	NO	NO	NO

38	110085872	1.15	R-22	MSN	YES	YES	NO
38	110085876	1.15	R-22	MSN	YES	YES	NO
38	110085882	1.15	R-22	MSN	YES	YES	NO
38	110085862	1.15	R-22	MSN	YES	YES	NO
38	110085870	1.15	R-22	MSN	YES	YES	NO
38	110085874	1.15	R-22	MSN	YES	YES	NO
38	110085868	1.15	R-22	MSN	YES	YES	NO
38	110085878	1.15	R-22	MSN	YES	YES	NO
38	110085864	1.15	R-22	MSN	YES	YES	NO
38	110085880	1.15	R-22	MSN	YES	YES	NO
38	110085866	1.15	R-22	MSN	YES	YES	NO
38	986050382	1.65	R-18	MSN	YES	YES	NO
38	986056211	1.58	CC	MU	YES	YES	NO
38	108141460	0.39	CC	MU	YES	YES	NO
38	162945000	0.26	CC	MU	YES	YES	NO
38	108141494	0.71	CG	MU	YES	YES	NO
38	160552000	5.51	CG	MU	YES	YES	NO
38	160501000	0.89	R-22	MU	YES	YES	NO
38	160462000	37.93	CG	MU	YES	YES	NO
38	160492000	0.41	R-22	MSN	YES	YES	NO
38	160469000	4.57	R-22	MU	YES	YES	NO
38	160482000	0.13	R-22	MU	YES	YES	NO
38	160485000	0.44	R-22	MSN	YES	YES	NO
38	108141464	0.42	CC	MU	YES	YES	NO
38	162973000	0.34	CC	MU	YES	YES	NO
38	162970000	0.97	R-22	MSN	YES	YES	NO
38	108141488	1.36	CG	MU	YES	YES	NO
38	108141492	0.71	CG	MU	YES	YES	NO
38	986037902	0.03	MX	MU	YES	YES	NO
38	110085860	1.15	R-22	MSN	YES	YES	NO
38	986037900	0.04	MX	MU	YES	YES	NO
38	108141458	1.03	CC	MU	YES	YES	NO
38	986037905	0.03	MX	MU	YES	YES	NO
38	986037901	0.04	MX	MU	YES	YES	NO
38	108141456	1.28	CC	MU	YES	YES	NO
38	986037903	0.04	MX	MU	YES	YES	NO
38	986037904	0.04	MX	MU	YES	YES	NO
38	110005000	1.65	R-18	MSN	YES	YES	NO
38	108141466	0.52	CC	MU	YES	YES	NO
38	986037906	0.06	MX	MU	YES	YES	NO
38	160512000	1.80	R-22	MU	YES	YES	NO
38	986056210	1.58	CC	MU	YES	YES	NO
38	110085888	4.28	CG	MU	YES	YES	NO
38	110085710	0.26	CC	MU	YES	YES	NO
38	986037907	0.36	MX	MU	YES	YES	NO
38	108141462	0.73	CC	MU	YES	YES	NO
38	160500000	0.64	R-22	MU	YES	YES	NO
38	110085700	0.66	CC	MU	YES	YES	NO
38	110010000	1.02	R-18	MSN	YES	YES	NO
38	160471000	0.21	R-22	MU	YES	YES	NO
39	110085010	0.56	R-6	MSN	NO	NO	NO
39	110085020	0.18	R-6	MSN	YES	NO	YES
39	160519001	4.08	CC	RAC	YES	YES	NO
39	986031297	9.90	CG	MU	YES	YES	NO

39	162932000	0.06	CG	RAC	YES	YES	NO
39	162938000	0.45	CC	MU	YES	YES	NO
39	162956000	0.53	CC	MU	YES	YES	NO
39	162944000	0.38	CG	MU	YES	YES	NO
39	160530000	0.32	CC	RAC	YES	YES	NO
39	161452000	0.89	CG	RAC	YES	YES	NO
39	160519000	4.08	CC	RAC	YES	YES	NO
39	160453001	2.68	CC	RAC	YES	YES	NO
39	162959000	0.87	CG	RAC	YES	YES	NO
39	161867000	0.66	CC	RAC	YES	YES	NO
39	162976005	1.24	CC	MU	YES	YES	NO
39	161866000	0.25	CC	RAC	YES	YES	NO
39	161903000	3.27	CC	RAC	YES	YES	NO
39	162974000	1.46	CC	MU	YES	YES	NO
39	162960000	0.46	CC	RAC	YES	YES	NO
39	162965000	0.93	CC	MU	YES	YES	NO
39	162953000	2.14	CC	MU	YES	YES	NO
39	161448000	1.06	CG	RAC	YES	YES	NO
39	162918000	0.36	CC	RAC	YES	YES	NO
39	162917000	0.42	CC	RAC	YES	YES	NO
39	160516000	2.35	CG	MU	YES	YES	NO
39	162916000	2.63	CG	MU	YES	YES	NO
39	162957000	0.42	CC	RAC	YES	YES	NO
39	162958000	2.12	CG	MU	YES	YES	NO
39	162920000	0.30	CC	MU	YES	YES	NO
39	162975000	0.37	CG	MU	YES	YES	NO
39	162976000	0.73	CC	MU	YES	YES	NO
39	162924000	0.07	CC	RAC	YES	YES	NO
39	162978000	0.16	CG	MU	YES	YES	NO
39	110085892	0.64	CG	MU	YES	YES	NO
39	162961000	0.94	CG	RAC	YES	YES	NO
39	162926000	0.91	CC	MU	YES	YES	NO
39	162948000	5.66	CC	MU	YES	YES	NO
39	162952000	1.29	CC	MU	YES	YES	NO
39	160523000	3.19	CG	RAC	YES	YES	NO
39	162963000	9.90	CG	MU	YES	YES	NO
40	115062070	1.64	IL	IC	NO	NO	NO
40	176600064	0.17	R-9	MSN	YES	NO	YES
40	176600066	0.19	R-9	MSN	YES	NO	YES
40	115050208	0.11	R-18	MSN	YES	YES	NO
40	115050210	0.11	R-18	MSN	YES	YES	NO
40	115050206	0.11	R-18	MSN	YES	YES	NO
40	115050090	0.11	R-18	MSN	YES	YES	NO
40	115050092	0.11	R-18	MSN	YES	YES	NO
40	115050088	0.11	R-18	MSN	YES	YES	NO
40	115050086	0.11	R-18	MSN	YES	YES	NO
40	176621000	7.22	MX	IC	YES	YES	NO
40	115050268	0.06	R-18	MU	YES	YES	NO
40	115041000	13.21	R-18	MU	YES	YES	NO
40	176611045	0.12	MX	IC	YES	YES	NO
40	115062042	9.06	MX	IC	YES	YES	NO
40	986033968	1.06	MX	IC	YES	YES	NO
40	115062046	0.06	MX	MU	YES	YES	NO
40	176611020	2.19	MX	IC	YES	YES	NO

40	986033966	0.44	MX	IC	YES	YES	NO
40	986033967	2.86	MX	IC	YES	YES	NO
40	176610000	4.79	MX	IC	YES	YES	NO
40	176601000	6.07	MX	IC	YES	YES	NO
40	115062034	2.46	MX	IC	YES	YES	NO
40	115062015	4.21	MX	IC	YES	YES	NO
40	176602000	4.34	MX	IC	YES	YES	NO
40	115062038	7.98	MX	IC	YES	YES	NO
40	115062016	0.59	MX	IC	YES	YES	NO
40	115062014	4.86	MX	IC	YES	YES	NO
40	115050214	0.12	R-18	MSN	YES	YES	NO
40	115050212	0.11	R-18	MSN	YES	YES	NO
40	115062040	0.99	MX		0 YES	YES	NO
40	115050082	0.11	R-18	MSN	YES	YES	NO
40	115050178	0.12	R-18	MSN	YES	YES	NO
40	115050094	0.12	R-18	MSN	YES	YES	NO
40	115050096	0.12	R-18	MSN	YES	YES	NO
40	115050264	5.51	R-18	MU	YES	YES	NO
40	986031053	2.01	MX	IC	YES	YES	NO
40	115050080	0.16	R-18	MSN	YES	YES	NO
40	115050084	0.11	R-18	MSN	YES	YES	NO
41	986058918	6.39	CC	MU	YES	YES	NO
41	986058919	1.18	CC	MU	YES	YES	NO
41	114727137	0.28	CC	MU	YES	YES	NO
41	114727164	0.18	CC	MU	YES	YES	NO
41	165895000	6.39	CC	MU	YES	YES	NO
41	165900000	1.18	CC	MU	YES	YES	NO
41	114727247	0.54	CC	MU	YES	YES	NO
41	114727006	0.20	CC	MU	YES	YES	NO
41	114727004	0.19	CC	MU	YES	YES	NO
41	114727138	0.61	CC	MU	YES	YES	NO
41	114727128	0.20	CC	MU	YES	YES	NO
41	165962000	0.82	CC	MU	YES	YES	NO
41	114727026	0.21	CC	MU	YES	YES	NO
41	114727166	0.19	CC	MU	YES	YES	NO
41	114727162	0.05	CC	MU	YES	YES	NO
41	164941010	0.58	CG	MU	YES	YES	NO
41	114727532	0.70	CC	MU	YES	YES	NO
41	114727534	0.56	CC	MU	YES	YES	NO
41	114727154	1.48	CC	MU	YES	YES	NO
41	114727028	0.28	CC	MU	YES	YES	NO
41	164941005	0.68	CG	MU	YES	YES	NO
41	164941000	0.20	CG	MU	YES	YES	NO
41	165012000	0.99	CG	MU	YES	YES	NO
41	114290000	0.89	CC	MU	YES	YES	NO
41	114727002	0.19	CC	MU	YES	YES	NO
41	114293000	0.70	CC	MU	YES	YES	NO
41	165955000	0.98	CC	MU	YES	YES	NO
41	165010000	0.94	CG	MU	YES	YES	NO
41	165953000	1.01	CC	MU	YES	YES	NO
41	165011000	1.09	CG	MU	YES	YES	NO
41	165956001	0.79	CC	MU	YES	YES	NO
41	165957000	8.32	CC	MU	YES	YES	NO
41	165897000	0.29	CC	MU	YES	YES	NO

41	165956000	2.24	CC	MU	YES	YES	NO
41	114727012	0.17	CC	MU	YES	YES	NO
41	114727024	0.21	CC	MU	YES	YES	NO
41	114727252	2.88	CG	MU	YES	YES	NO
41	165898000	0.80	CG	MU	YES	YES	NO
41	114727022	0.22	CC	MU	YES	YES	NO
41	114727258	0.65	CG	MU	YES	YES	NO
41	114727256	0.29	CC	MU	YES	YES	NO
41	114727008	0.22	CC	MU	YES	YES	NO
41	164931000	19.35	R-22	MU	YES	YES	NO
41	114727274	2.15	CG	MU	YES	YES	NO
41	114727262	0.74	CG	MU	YES	YES	NO
41	114727269	0.66	CG	MU	YES	YES	NO
41	114727010	0.19	CC	MU	YES	YES	NO
41	114727250	0.68	CG	MU	YES	YES	NO
41	114727020	0.23	CC	MU	YES	YES	NO
41	114727014	0.20	CC	MU	YES	YES	NO
41	114727244	0.38	CC	MU	YES	YES	NO
41	114727268	0.65	CG	MU	YES	YES	NO
41	114727246	4.19	CC	MU	YES	YES	NO
41	114727254	0.40	CG	MU	YES	YES	NO
41	114727266	1.39	CG	MU	YES	YES	NO
41	114727260	0.69	CG	MU	YES	YES	NO



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

VANCOUVER MUNICIPAL CODE
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LAND USE AND DEVELOPMENT CODE

May 5, 2026

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CHAPTER 20.110
INTENT AND PURPOSE

Sections:

20.110.010 Intent and Purpose.

20.110.010 Intent and Purpose.

A. *Overall purpose*. The purpose of this Development Code is to implement the City's Comprehensive Plan, and by extension the requirements of the Washington State Growth Management Act (GMA).

B. Revision of the Development Code. A major revision of the Development Code was completed in June 2026.

THE VANCOUVER MUNICIPAL CODE IS CURRENT THROUGH UPDATE, PASSED UPDATE.

DISCLAIMER: THE CITY CLERK'S OFFICE HAS THE OFFICIAL VERSION OF THE VANCOUVER MUNICIPAL CODE. USERS SHOULD CONTACT THE CITY CLERK'S OFFICE FOR ORDINANCES PASSED SUBSEQUENT TO THE ORDINANCE CITED ABOVE.

CITY WEBSITE: www.cityofvancouver.us
CITY TELEPHONE: (360) 487-8480

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CHAPTER 20.120
LEGAL PROVISIONS

Sections:

20.120.010 Title.

20.120.020 Conflicting Regulations.

20.120.030 Severability and Validity.

20.120.010 Title.

A. *Name.* This title shall be and may be cited as the Development Code of the City of Vancouver, and shall be codified in Title 20 of the Vancouver Municipal Code. The Vancouver Municipal Code may be cited by the abbreviation VMC.

B. *Law of the City.* The contents of this Development Code shall be prima facie the law of a general and permanent nature of the City of Vancouver, State of Washington, and as such shall be entitled to recognition by all administrative bodies and tribunals of the city, the state or any of the political subdivisions or municipal corporations of the state, and by any court. Copies of the Development Code shall be received as the law of the city without further proof in all courts and administrative tribunals of the county and state.

C. *Official documents.* In case of any omissions or any inconsistency between any of the provisions of the Development Code as supplemented or modified from time to time and the official documents passed by the City Council of the City of Vancouver, Washington, the official documents shall control.

20.120.020 Conflicting Regulations.

Conflicting regulations. Wherever any provision of this Development Code imposes a restriction on the use of land greater than is provided by another ordinance, then this Development Code shall prevail.

20.120.030 Severability and Validity.

Validity of code. If any section, subsection, sentence, clause, or phrase of this Development Code is for any reason held by a court of competent jurisdiction to be invalid, such decision shall not affect the validity of the remaining portions of this Development Code. The City Council of the City of Vancouver hereby declares that should any section, paragraph, sentence, or word of this Development Code be declared for any reason to be void or unconstitutional, on its face or as applied, it is hereby provided that all other parts of the same which are not expressly held to be void or unconstitutional shall continue in full force and effect.

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CHAPTER 20.130
ZONING MAP ADMINISTRATION

Sections:

20.130.010 Classification of Base Zoning Districts.

20.130.020 Establishment of Map and Text.

20.130.030 Maintenance of Map.

20.130.040 Amendments to Map and Text.

20.130.050 Interpretation of the Zoning Map.

20.130.010 Classification of Base Zoning Districts.

Classification of base zoning districts. The City of Vancouver is divided into base zoning districts, as named and described in this title and available on file at the City. Base zoning districts may be changed, as set forth in Section 20.130.040 VMC. Each lot, tract and parcel of land or portion thereof within the base zoning district boundaries as designated and marked on the zoning map, is classified, zoned and limited to the uses as hereinafter specified and defined for the applicable zoning district.

20.130.020 Establishment of Map and Text.

Establishment of map and text. This development code includes both a map dividing the City of Vancouver into various zones, and a text establishing the uses, development standards, and other regulations for each zoning district. The location and boundaries of all base zoning districts designated in this title are as shown on the map titled Zoning Map of the City of Vancouver, dated with the effective date of adoption of new development code and signed by the mayor and the clerk of the city, and as amended, is hereinafter referred to as the Zoning Map.

20.130.030 Maintenance of Map.

The original signed copy of the zoning map containing the base zoning districts designated at the time of adoption of this title shall be filed in the office of the city clerk pursuant to RCW 35.63.100 and a duplicate shall be filed in the office of the Planning Official to keep the maps up to date at all times. Copies of all zoning maps and amendments shall be dated with the effective date of the document adopting the map and amendments and shall be maintained without change, together with the adopting documents, on file in the Community Development Department.

20.130.040 Amendments to Map and Text.

A. *Amendments.* Amendments may be proposed by City Council on its own motion or may be proposed by the Planning Commission on its own motion, or such an amendment may be proposed by an applicant or city staff pursuant to Chapter 20.285 VMC, Text and Map Amendments, and Chapter 20.210 VMC, Decision Making Procedures. A correct copy of each amendment to the text or to the map established by this title shall be maintained on file in the offices of the city clerk and the Planning Official.

B. *Timing and responsibility for updating official Zoning Map.* All amendments hereafter made to the Zoning Map by ordinance shall be shown on such map(s) and it shall be the responsibility of the Planning Official to keep the maps up to date at all times. Any amendments to the zoning map shall be made in accordance with the Comprehensive Plan Map, as amended.

Table 20.130.040-1 is intended to identify individual base zoning districts that are consistent with individual Comprehensive Plan designations. Those base zoning districts that are not included within a given plan designation are inconsistent with the Comprehensive Plan Map and are not permitted within that designation.

TABLE 20.130.040-1. COMPREHENSIVE PLAN AND CORRESPONDING ZONING DISTRICT DESIGNATIONS

Comprehensive Plan Designation	Corresponding Zoning Districts
Residential Neighborhoods	• LS: Low-Scale Neighborhood • MS: Medium-Scale Neighborhood • MH: Manufactured Home Development
Urban Mixed Use	• MX: Mixed-Use Neighborhood • RA: Regional Activity Center
Employment and Industry	• IC: Institutional / Campus • IE: Industrial / Employment • HI: Heavy Industrial
Green Space	• PO: Parks • NA: Natural Areas

20.130.050 Interpretation of the Zoning Map.

Interpretations. Where, due to the scale, lack of detail or illegibility of the zoning map, there is uncertainty, contradiction or conflict as to the intended location of any base zoning district boundary as shown thereon, the Planning Official shall make an interpretation in writing of said map upon request of any person pursuant to Chapter 20.255 VMC, Interpretations and Minor Adjustments. Any person aggrieved by any such interpretation may appeal such interpretation to the Hearing Examiner under Section 20.225.020 VMC. The Planning Official in interpreting the zoning map, or the Hearing Examiner in deciding any appeal, shall apply the following standards:

A. *General rules for drawing boundaries.* Base zoning district boundary lines are intended to follow lot lines or be parallel or perpendicular thereto, or along the centerline of alleys, streets, rights-of-way or watercourses, unless such boundary lines are fixed by dimensions shown on the zoning map. Boundaries indicated as approximately following river, stream and/or drainage channels shall be construed as following river, stream and/or drainage channels. If a base zoning district boundary divides a lot into two or more zoning districts, the location of the boundary, unless indicated by dimensions shown on the zoning map, shall be determined by the use of the map scale shown thereon.

B. *When rights-of-way are vacated.* When zoning districts are separated by a public street, alley or other public way, the boundary between the districts shall be construed as being the centerline of the right-of-way. Whenever any street, alley, or other public way is vacated in the manner authorized by law, the zoning district adjoining each side of such street, alley or public way shall extend to the center of the former street, alley or public way.

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CHAPTER 20.140
ENFORCEMENT

Sections:

20.140.010 Compliance.

20.140.020 Certificates of Occupancy.

20.140.030 Enforcement.

20.140.010 Compliance.

A. *General.* Except as specifically set forth elsewhere in this title, no building or other structure shall be constructed, improved, altered, enlarged or moved, nor shall any use or occupancy of premises within the city be commenced or changed; nor shall any condition of or upon real property be caused or maintained, after the effective date of this title, except in conformity with conditions prescribed for each of the several zones and building types established hereunder and with all applicable local, state and federal laws and regulations. It shall be unlawful for any person, firm or corporation to erect, construct, establish, move into, alter, enlarge, use or cause to be used, any buildings, structures or improvement or use of premises located in any zone described in this title contrary to the provisions of this title.

B. *Obligation of successor.* The requirements of this title apply to the property owner of record and/or the person undertaking the development or the use of structures or land and to that person's successors in interest.

C. *Legality of pre-existing approvals.* Any use of a structure or of land approved by the city prior to the effective date of this title, or by the county in annexed areas prior to annexation, may continue if consistent with such approvals.

20.140.020 Certificates of Occupancy.

A. *Purpose.* The purpose of this section is to ensure that each new or expanded use of a structure or of a site without a structure, and each new structure or alteration of an existing structure, complies with all applicable provisions of this title. Certificates of occupancy also provide the city with a record of each new or expanded use of a structure or site.

B. *Application of Certificates of Occupancy*.

1. *For use of new or expanded buildings.* No buildings hereafter erected or enlarged shall be occupied, used or changed in use until a certificate of occupancy shall have been issued. Such certificates shall be applied for concurrently with the application for a building permit. A certificate of occupancy shall be issued only after such building or enlargement has been completed in conformity with the provisions of this title, with an approved site plan, if required, and when the proposed use conforms to this title and to any and all other required conditions. Any use legally occupying an existing building at the time this title becomes effective may be continued but shall not be changed, unless a certificate of occupancy for the new use shall have been issued by the city, if required by subsection (B)(2) of this section, after finding that such use conforms to this title and required conditions.
2. *For use of existing buildings.* In the event a change shall be made in the classification of occupancies or use of any existing building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, such building shall be made to comply with the requirements of the city adopted building code, and such change in occupancy classification shall require a certificate of occupancy. A certificate of occupancy shall not be required solely for changes in use within the same division of the same group of occupancy defined by the Uniform Building Code, as adopted by the city.
3. *Record.* A record of all certificates of occupancy shall be kept on file with the Community Development Department.

20.140.030 Enforcement.

The applicable department director or designee has authority to enforce the requirements of this title. Enforcement of VMC Title 20 shall proceed under the provisions of VMC Title 22 except for VMC Chapter 20.450.035, Landscaping and Tree Conservation, which utilize separate enforcement mechanisms. Any approval, permit, certificate, or license issued in conflict with the provisions of this title, intentionally or otherwise, may be suspended or revoked by the Planning Official. The Planning Official and the City Attorney or designee may negotiate a settlement, compromise or otherwise dispose of an action when to do so would be in the best interest of the city.

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CHAPTER 20.150
DEFINITIONS

Sections:

20.150.010 Meaning of Words Generally.

20.150.020 Meaning of Common Words.

20.150.030 Common Acronyms.

20.150.040A Meanings of Specific Words and Terms A through D.

20.150.040B Meanings of Specific Words and Terms E through H.

20.150.040C Meanings of Specific Words and Terms I through L.

20.150.040D Meanings of Specific Words and Terms M through P.

20.150.040E Meanings of Specific Words and Terms Q through T.

20.150.040F Meanings of Specific Words and Terms U through Z.

20.150.010 Meaning of Words Generally.

General. All of the terms in this title have their commonly accepted dictionary meaning unless they are specifically defined in this chapter, or the context in which they are used clearly indicates to the contrary.

20.150.020 Meaning of Common Words.

A. *Tense.* All words used in the present tense include the future tense.

B. *Singular/plural*. All words used in the plural include the singular, and all words used in the singular include the plural unless the context indicates to the contrary.

C. *Use of shall, should, will and may*. The words shall and will are mandatory, the word should is directory, and the word may is permissive.

D. *Use of building and structure.* The word building includes the word structure.

E. *Use of 'used for'.* The phrase used for includes the phrases arranged for, designed for, intended for, maintained for and occupied for.

F. *Use of land and property.* The words land and property are used interchangeably unless the context clearly indicates to the contrary.

G. *Use of occupied.* The word occupied shall include premises designed or intended to be occupied.

H. *Use of person.* The word person shall include persons, association, firm, partnership or corporation, as well as the individual.

I. *Form-Based Code.* Generally, a term used to describe the elements included in Chapter 20.410 VMC, that focuses on the physical form of a building in relation to public spaces.

20.150.030 Common Acronyms.

ADA The Americans with Disability Act

ADA Also, Average Daily Attendance

ADT Average Daily Traffic

ADU Accessory Dwelling Unit

BAS Best Available Science

BFE Base Flood Elevation

BMPs Best Management Practices

BT Building Type

CAP Critical Areas Permit

CAR Critical Areas Report

CDD Community Development Department

CFR Code of Federal Regulations

CMZ Channel Migration Zone

CUP Conditional use permit

DAHP Washington State Department of Archaeology and Historic Preservation

DBH Diameter at Breast Height

DFIRM Digital Flood Insurance Rate Map

DNS Determination of Non-Significance

DNR Washington State Department of Natural Resources

DOE or **Ecology** Washington State Department of Ecology

DS Determination of Significance

EIS Environmental Impact Statement

ESA The Federal Endangered Species Act

FAA Federal Aviation Administration

FAR Floor Area Ratio

FBFM Flood Boundary-Floodway Maps

FCC Federal Communications Commission

FEMA Federal Emergency Management Agency

FIRM Flood Insurance Rate Map

FIS Flood Insurance Study

FT Frontage Type

FTE Full-time Equivalent

GLA Gross Leaseable Area

GMA The Washington State Growth Management Act of 1990

GSF Gross Square Feet

HGM Hydrogeomorphic

LOS Level of service

MDNS Mitigated Determination of Non-Significance

NAICS The North American Industrial Classification System

NFIP National Flood Insurance Program

OHWM Ordinary High Water Mark

PUD Planned Unit Development

RCW Revised Code of Washington

SEPA State Environmental Policy Act

SF Square Feet. Also s.f. and sq.ft.

SRO Single-Room Occupancy

SWCCA Southwest Washington Clean Air Agency (formerly SWAPCA)

TDL Total Developable Land

USC United States Code

VMC Vancouver Municipal Code

WAC Washington Administrative Code

WDFW Washington Department of Fish and Wildlife

20.150.040A Meanings of Specific Words and Terms A through D.

Abutting. Contiguous or adjoining with a common boundary line, except that where two or more lots adjoin only at a corner or corners, they shall not be considered as "abutting" unless the common property line between the two parcels measures eight feet or more in a single direction. It shall include the terms "adjoining" and "contiguous."

Accept. To receive as complete and in compliance with all submittal requirements.

Access or Access Way. The place, means or the way by which pedestrians and vehicles shall have safe, adequate and usable ingress and egress to a property or use as required by this title.

Accessory Dwelling Unit (ADU). A dwelling unit located on the same lot as a single-family housing unit, duplex, triplex, fourplex, townhome or rowhome under 1,000 square feet. An attached ADU is located within or attached to a housing unit. A detached ADU is a unit that is separate from a housing unit and is on the same property.

Accessory Equipment Structure. An unstaffed structure that is subordinate and clearly incidental to the principal use or structure on the lot and may be used to house and protect the equipment necessary for processing wireless communications signals. Associated equipment may include air conditioning and emergency generators.

Accessory Structure. A building or structure which is clearly incidental to the primary structure on the same lot.

Accessory Use. A use of land or portion there of which is clearly incidental and subordinate to the primary use type on the land located on the same lot or premises.

Active Transportation. Any self-propelled, human-powered mode of transportation, such as walking, biking, or using a wheelchair, that is used for leisure or utilitarian purposes.

Acre. A measure of land area containing 43,560 square feet.

Actual Construction. The actual placing of building materials in their permanent position, fastened in a permanent manner, including any excavation.

Addition. Means the same as enlargement.

Adjacent. Located directly across a street right-of-way, private street or alley.

Adjoin. Means the same as abutting.

Adult Bookstore. Any premises from which minors are excluded and in which the retail sale of books, magazines, newspapers, movie films, devices, slides or other photographic or written reproductions distinguished or characterized by their emphasis on matter depicting, describing or relating to specified sexual activities or specified anatomical areas is conducted as a principal use of the premise; or as an adjunct to some other business activity, but which constitutes the primary or a major attraction to the premises.

Adult Entertainment Shows. Any premises from which minors are excluded and in which live entertainment is provided, or any device is provided in which the subject matter is distinguished or characterized by the emphasis on matter depicting, describing or relating to specified sexual activities or displaying specified anatomical areas as the principal use of the premises or is shown as an adjunct to some other business activity which is conducted on the premises and constitutes a major attraction; and wherein fees of any kind are charged.

Adult Motion Picture Theater. Any establishment from which minors are excluded in which motion pictures, slides or similar photographic reproductions are shown depicting adult entertainment as the principal use of the premises, or are shown as an adjunct to some other business activity which is conducted on the premises and constitutes a major attraction; and wherein fees of any kind are charged; and wherein such movies are shown on a regular basis, and not to include a theater showing adult movies less than 5% of the total showing time of the theater.

Agent. Any person authorized in writing to act on behalf of the legal owner.

Agriculture, Existing and Ongoing. Those activities conducted on lands defined in RCW 84.34.020(2), and those activities involved in the production of crops or livestock, for example, the operation and maintenance of farm and stock ponds or drainage ditches; the operation and maintenance of ditches, irrigation systems (including irrigation laterals, canals, or irrigation drainage ditches); changes between agricultural activities; and normal maintenance, repair, or operation of existing serviceable structures, facilities, or improved areas. Activities that bring an area into agricultural use are not part of an ongoing operation. An operation ceases to be ongoing when the area on which it is conducted is converted to a nonagricultural use or has lain idle for more than five years, unless the idle land is registered in a federal or state soils conservation program, or unless the activity is maintenance of irrigation ditches, laterals, canals, or drainage ditches related to an existing and ongoing agricultural activity. Forest practices are not included in this definition.

Airport Approach Surface. The surface which is longitudinally centered on an airport's extended runway centerline, extending outward and upward from the end of the primary surface. An approach surface is applied to each end of the runway based upon the type of approach procedure permitted. Because landings under instrument flight rules, using the Portland International Airport Localizer Directional Aid, are an approved procedure at Pearson Field, the following approach surface dimensions have been applied:

- Width of approach surface: 500' at inner end, 4,000' at outer end (inner end begins at end of primary surface)
- Length of approach surface: 10,000 feet
- Slope of approach surface: 34:1 (one foot vertically for every 34 feet horizontally)

Airport Conical Surface. The conical surface is an inclined plane beginning at the edge of the horizontal surface and extending outward at a 20:1 slope for a distance of 4,000 feet.

Airport Horizontal Surface. The horizontal plane 150 feet above the established airport elevation. The shape of the plane is determined by striking arcs from the end of each primary surface. The radius of each arch is connected by lines tangent to the arcs. For Pearson Field, the radius of these arcs is 5,000 feet for runways 08 and 26.

Airport Transitional Surface. The transitional surface is an inclined plane extending outward from the primary and approach surfaces at a 7:1 slope. From the primary surface and approach surface, the transitional surface slopes upward to the horizontal surface. The transitional surface extends outward from the approach surface a distance of 5,000 feet.

Aisle. The corridor by which vehicles enter into and depart from parking spaces.

Alley. A public right-of-way or private easement not over 30 feet wide which provides a secondary means of access to abutting lots, not intended by the city for general traffic circulation.

Alteration of Watercourse. Any action that will change the location of the channel occupied by water within the banks of any portion of a riverine waterbody.

Alteration, Structural. Any change in a supporting member of a building, such as a bearing wall, column, beam or girder, floor or ceiling joist, roof rafts, roof diaphragms, foundations, piles, or retaining wall or similar components.

Altered. Structurally changed.

Flexible Work Schedules. Programs such as compressed work weeks that eliminate commuting trips for affected employees. For the purposes of this chapter, changing the time of when an affected employee begins his work shift shall not be considered an alternative work schedule if it only moves trips out of the peak period and does not eliminate trips.

Amateur or Ham Radio. Radio facilities operated for noncommercial purposes by individuals licensed by the FCC with an interest in construction and operation of radio equipment, usually as a hobby or avocation.

Amendment. A change in the wording, context or substance of this title or the comprehensive plan, or a change in the boundaries of a district upon the zoning district map or the boundaries of a designation on the comprehensive plan map.

Amenity. A natural or created feature that enhances the aesthetic and functional quality or makes more attractive or satisfying a particular property, place or area.

Americans with Disabilities Act (ADA). A 1990 federal law designed to bring disabled Americans into the economic mainstream by providing them equal access to jobs, transportation, public facilities and services. The ADA contains requirements for most developments including accessible parking stalls, entrances and exits, pathways, and public facilities such as restrooms.

Anadromous. Fish that migrate up rivers and streams from the ocean to breed in fresh water.

Annexation. The incorporation of a land area into the City of Vancouver with a resulting change in the boundaries of the city.

Annual Average Day/Night Sound Level (Ldn). Calculated in decibels, the Ldn is the 24-hour logarithmic average sound level from midnight to midnight, obtained after adding 10 decibels to sound levels in the night from midnight to 7 a.m., and from 10 p.m. to midnight (0000 to 0700, and 2200 to 2400 hours), and then logarithmically average day-to-day over a 12-month period.

Antenna. A device used to transmit and/or receive radio or electromagnetic waves between land- and/or satellite-based structures; any device commonly consisting of poles, panels, rods, reflecting discs or similar device use for the transmission or reception of radio frequency signals, typically mounted on a supporting tower, pole, mast or building.

Appeal. A request for an impartial review of a land use decision or interpretation of land use-related codes rendered by community development department, its employees or any review body of the city of Vancouver.

Applicable Pretreatment Standards. For any specified pollutant, city prohibitive standards, city specific pretreatment standards (local limits), State of Washington pretreatment standards, or EPA's Categorical Pretreatment Standards, whichever standard is most appropriate or most stringent.

Applicant. A person submitting an application for development.

Approach Surface. The surface which is longitudinally centered on an airport's extended runway centerline, extending outward and upward from the end of the primary surface at a slope of 20 feet horizontally for each foot vertically. In plan, the perimeter of the approach surface coincides with the perimeter of the approach zone.

Approach Zone. An area at the end of an airport's runway which is 250 feet wide and expands outward uniformly to a width of 1,250 feet at a horizontal distance of 5,000 feet. The centerline of the zone is a continuation of the centerline of the runway.

Approved Plan. A plan that has been granted final approval by the appropriate approval authority.

Archaeological Interest. Capable of providing scientific or humanistic understandings of past human behavior, cultural adaptation, and related topics through the application of scientific or scholarly techniques such as controlled observation, contextual measurement, controlled collection, analysis, interpretation, and explanation [WAC 25-48-020(12)].

Archaeological Object. An object that comprises the physical evidence of an indigenous and subsequent culture including material remains of past human life including monuments, symbols, tools, facilities, and technological by-products [WAC 25-48-020(8)].

Archaeological Resources. Any material remains of human life or activities that are of archaeological interest. This shall include all sites, objects, structures, artifacts, implements, and locations of prehistoric or archaeological interest, whether previously recorded or still unrecognized, including, but not limited to, those pertaining to prehistoric and historic American Indian or aboriginal burials, campsites, dwellings, and their habitation sites, including rock shelters and caves, their artifacts and implements of culture such as projectile points, arrowheads, skeletal remains, grave goods, basketry, pestles, mauls, and grinding stones, knives, scrapers, rock carvings and paintings, and other implements and artifacts of any material [WAC 25-48-020(10)]. This shall also include any material remains of human life or activities from historic periods which are located at least partially below the ground surface necessitating the use of archaeological methods for study or recovery.

Archaeological Resource Survey. A procedure by which an archaeologist makes a determination of the actual existence (presence or absence) of an archaeological site in a disturbance area, a preliminary assessment of the site's potential significance, and a recommendation for further evaluation, avoidance, mitigation, or recovery of resources in compliance with the provisions of this chapter.

Archaeological Site. Land or water areas that show evidence of artifacts of human, plant or animal activity, usually dating from periods of which only vestiges remain.

Archaeological Site, Known, Recorded. An archaeological site that has been recorded with the Washington State Department of Archaeology and Historic Preservation (DAHP) or its successor.

Archaeological Site, Potentially Significant. An archaeological site which:

1. contains archaeological objects at a density of at least 100 per cubic meter per stratigraphic or cultural unit; or
2. includes at least one feature; or
3. includes at least one relatively uncommon archaeological object; or
4. contains skeletal remains; or

5. is otherwise considered potentially significant by the archaeologist.

Archaeologist, Professional. "Professional archaeologist" means a person with qualifications meeting the federal secretary of the interior's standards for a professional archaeologist. Archaeologists not meeting this standard may be conditionally employed by working under the supervision of a professional archaeologist for a period of four years provided the employee is pursuing qualifications necessary to meet the federal secretary of the interior's standards for a professional archaeologist. During this four-year period, the professional archaeologist is responsible for all findings. The four-year period is not subject to renewal. RCW 27.53.030(8).

Area of Shallow Flooding. A designated zone AO, AH, AR/AO or AR/AH (or VO) on a community's Flood Insurance Rate Map (FIRM) with a one percent or greater annual chance of flooding to an average depth of one to three feet where a clearly defined channel does not exist, where the path of flooding is unpredictable, and where velocity flow may be evident. Such flooding is characterized by ponding or sheet flow. Also referred to as the "sheet flow area."

Areas of Special Flood Hazards. Lands in the flood plain subject to a one percent or greater chance of flooding in any given year. Designations on Flood Insurance Rate Maps always include the letter A. Also referred to as "frequently flooded areas." "Special flood hazard area" is synonymous in meaning with the phrase "area of special flood hazard."

Arterial. Any principal arterial, minor arterial, or collector arterial streets.

Articulation. The elements in the massing of a building, which establish character and visual interest by adding depth and variation to the facades and building envelope.

ASCE 24. The most recently published version of ASCE 24, Flood Resistant Design and Construction, published by the American Society of Civil Engineers.

Assessed Value. The value at which property is appraised for tax purposes.

Attached Antenna. An antenna affixed to an existing structure other than a wireless communication support structure.

Attached Dwelling. An attached dwelling refers to a residential dwelling unit that shares one or more common walls with another dwelling unit, typically within the same structure or on an adjacent lot.

Attached Sidewalks. Those sidewalks abutting the back of a curb.

Automobile Wrecking. The dismantling or disassembling of motor vehicles, or the storage, sale, or dumping of dismantled, partially dismantled, obsolete, or wrecked vehicles or their parts. Three or more dismantled, obsolete or inoperable motor vehicles on one lot shall constitute a wrecking yard.

Average. The arithmetic mean.

Average Daily Attendance (ADA). Regarding School Impact Fees, the average number of students attending an elementary or secondary school and used for the design of the facility.

Awning. A hood or cover which projects from the wall of a building, of a type which may be retracted, folded or collapsed against the face of a supporting building.

Banner. An on-site sign such as those used to announce an open house or a grand opening, or to make a special announcement. Normally, it is constructed of fabric and is without a rigid frame.

Base Flood. The flood having a 1% chance of being equaled or exceeded in any given year. Also referred to as the "100-year flood." Designated on Flood Insurance Rate Maps by the letter A.

Base Flood Elevation. The elevation that the base flood is expected to reach. Also referred to as the "100-year flood elevation."

Basement. A portion of a building included between a floor, with its level 2 feet or more below the level from which the height of the building is measured, and the ceiling next above said floor. For the purposes of Section 20.720.120 VMC, Frequently Flooded Areas, basement means any area of a building having its floor subgrade (below ground level) on all sides.

Base zone. The zoning designation applicable to a parcel of property irrespective of an Overlay District as reflected on the Vancouver Zoning Map.

Beach Nourishment. With respect to bank erosion hazard areas, beach nourishment is the placement of sand or soil to fill an eroding bank.

Berm. A mound of earth, typically linear in form and generally used as a buffer between uses or properties.

Best Management Practices. Systems of practices and management measures that:

1. control soil loss and reduce water quality degradation caused by nutrients, animal waste, toxics, and sediment; and
2. minimize adverse impacts to surface water and groundwater flow, circulation patterns, and to the chemical, physical, and biological characteristics of fish and wildlife habitat conservation areas, wetlands and buffers.

Bike Lane. Lanes on an improved street which are designated for use by cyclists and separated from vehicular traffic.

Bikeway. A pathway, paved and separated from streets and sidewalks, designed to be used by cyclists.

Binding Site Plan. A type of land division that segregates a portion of a legal lot created for the sale or lease of commercially- or industrially-zoned property; on leased sites; and creation of condominiums pursuant to 58.17.040 RCW.

Bioengineering Techniques. Techniques that apply the principles of the biological, ecological, and soils sciences and structural engineering to build structures which, using live plant materials as a main structural component, stabilize the soil against erosion, sedimentation, and flooding. Also referred to as "soft armoring techniques."

Biomass Generation. A major utility facility that provides for the production or collection of organic materials such as wood and agricultural residues and municipal solid waste that are primarily organic materials and the conversion or use of that material for the production of heat, electricity, or substitute fuels through several processes including, but not limited to, burning, pyrolysis, or anaerobic digestion.

Block. A group of lots, tracts or parcels within well defined and fixed boundaries.

Bog. A type of wetland where (1) organic (peat or muck) soil layers comprise at least 16 of the first 32 inches of the soil profile; or (2) there is more than 70% cover of mosses at ground level and more than 30% of the total shrub and herbaceous cover consists of species listed in Table 3 – Characteristic Bog Species in Washington State found in Hruby, 2004, Washington State Wetlands Rating System for Western Washington, Ecology publication #04-06-025, or as revised by Ecology. Many bogs have soils classified as peat or muck, are nutrient poor, have a low pH (acidic), and are fed largely by rainfall rather than streams or groundwater.

Boundary Adjustment. The minor alteration of the boundary between two lots or tracts which does not result in the creation of any additional lot(s); also known as boundary line adjustment.

Buffer. An area that is contiguous to and protects a critical area and which is required for the continued maintenance, functioning, and/or structural stability of a critical area.

Build-Out, Front. Front Build-Out refers to the space on a front property line which must be occupied by the façade of the main building to help ensure a continuous pedestrian-friendly public realm along the primary street.

Build-Out, Side. Side Build-Out refers to the space on a lot's side property line which must be occupied by the façade of the main building to help maintain a continuous wall, specifically for corner lots with side streets.

Build-to Line, Front. Front Build-to Line refers to the designated line measured in feet or a range of feet, typically parallel to the property line and adjacent to the public right-of-way and Primary Street, where the façade of a main building must be placed on a lot. A Build-to Line differs from a traditional setback in that it mandates an area the façade must be placed to ensure consistent spatial definition of the public realm, rather than identifying a zone which cannot be encroached.

Build-to Line, Side. Side Build-to Line refers to the designated line measured in feet or a range of feet, typically parallel to the side property line and adjacent to the public right of way and Side Street, where the façade of a main building must be placed on a lot. A Build-to Line differs from a traditional setback in that it mandates an area the façade must be placed to ensure consistent spatial definition of the public realm, rather than identifying a zone which cannot be encroached.

Building. Any structure having a roof and walls, used or built for the shelter or enclosure of persons, animals or property of any kind.

Building Envelope. That portion of a legal lot exclusive of the areas required for front, side, and rear yards and other required open spaces and which is available for siting and constructing a building or buildings.

Building Height. The vertical distance from the average grade to the average height of the roof peak of the building per Section 20.170.050 VMC, except in a shoreline jurisdictional area, in which case the height shall be measured from average existing grade (prior to development) to the highest point of a structure (see also WAC 173-27-030). For exceptions subject to airport height limits located within the approach, transitional and horizontal surfaces, refer to Airport definitions and Chapter 20.570 VMC.

Building Mass. Building Mass refers to the overall size and shape of a building considering its relationship with the lot and street frontage.

Building Type. A category of buildings determined by function, placement on the lot, and configuration. See Chapter 20.420 Building Types.

Building, Main. A building which contains the principal use permitted on the lot, as provided in this title.

Building Permit. The permit required for new construction and additions pursuant to Title 17 of the Vancouver Municipal Code (VMC).

Business Complex. Any building containing more than one business, or any group of buildings in close proximity to one another sharing parking, ownership, and ingress or egress.

Caliper. The diameter of a tree trunk measured at 6 feet above the ground for up to and including 4 inches caliper size, and one foot above the ground for larger trees.

Canopy. A permanent roofed structure attached to and supported by the building.

Capital Facilities Plan. The City of Vancouver Capital Facilities Plan element of the Comprehensive Plan adopted pursuant to Chapter 36.70A RCW and RCW 82.02.050, and as such plan is amended.

Caretaker Residence. A single unit providing a complete independent living space for one or more persons, including permanent facilities for living, sleeping, eating, cooking and sanitation (same as Dwelling).

Change of Use. Any use that differs from the previous use as defined in Chapter 20.160, Use Classifications.

Citizens Band Radio. Two-way radio facilities operated for a short-range personal and business communications, without necessity of a federal license, pursuant to 47 CFR Part 95.

City. The City of Vancouver, Washington.

City Council or Council. The City Council of the City of Vancouver, Washington.

City Standards. Shall mean standard specifications, technical drawings, detail drawings and other information the city has adopted as minimum standards.

Clark County Cultural Resources Inventory. The comprehensive inventory of historic resources within the boundaries of Clark County including resources identified in the Clark County cultural resources inventory and other inventories by local jurisdictions within Clark County.

Cleaner Fuels. Liquid or gaseous fuels produced from renewable sources or that have low or no emissions, including the following:

1. Carbon-free fuels that generate no carbon emissions including green hydrogen or fuels that are certified by state or federal responsible agencies as net-zero carbon emissions.
2. Any credit-generating fuel under the Washington State Low Carbon Fuel Standard (HB 1091 2021-2022) as allowed by the Washington State Department of Ecology.
3. Any biomass renewable fuels approved by the federal Environmental Protection Agency under the federal Renewable Fuel Standard (40 CFR Part 80) as regulation exists or may hereafter be amended and meeting any future federal renewable fuels regulations.
4. Alcohol fuels meeting the requirements of RCW 19.112.010(1) as that statute exists or may hereafter be amended.
5. Biodiesel fuel meeting the requirements of RCW 19.112.010(3), and renewable diesel meeting the requirements of RCW 19.112.010(9), as those statutes exist or may hereafter be amended.

6. E85 motor fuel which meets the requirements of RCW 19.112.010(2) exclusively for the propulsion of motor vehicles upon the roads, or RCW 19.112.010(6) for other motors, as those statutes exist or may hereafter be amended.
7. Alternative fuels that are not fossil fuels and that produce low or no carbon that meet state or federal requirements not otherwise listed above.

Clearing. The destruction or removal of vegetation from a site by physical, mechanical, chemical or other means. This does not include landscape maintenance or pruning consistent with accepted horticultural practices, such as those recommended by the Washington State University Extension Service, which does not impair the health or survival of the trees or native vegetation.

Closed Record Approval Hearing. An administrative hearing to approve or deny a project permit that is on the record to the City Council following an open record predecision hearing as defined by WAC 197-11-775 before the Planning Commission or Hearing Examiner.

Co-living housing. A type of household living with sleeping units that are independently rented and lockable and provide living and sleeping space, and residents share kitchen facilities with other sleeping units in the building. Co-living housing may include, but is not limited to, congregate living facilities, single room occupancy, rooming house, boarding house, lodging house, and residential suites.

Co-location. The use of a single wireless communications support structure or the use of a site by more than one wireless communications provider.

Commercial Nursery, or Tree Farm. A licensed plant or tree nursery or farm in relation to those trees planted and growing on the premises of the licensee, which are planted and grown for sale through retail or wholesale channels in the ordinary course of the licensee's business.

Commission or Planning Commission. Means the Planning Commission of the City of Vancouver, Washington.

Compatible. The capability of being able to function in a consistent and harmonious manner with others and surroundings.

Comprehensive Plan. A long-range plan intended to guide the growth and development of a community or region that typically includes inventory and analytic sections leading to recommendations for the community's future economic development, housing, recreation and open space, transportation, community facilities and land use, all related to the community's goals and objectives for these elements.

Concurrent. Means that the existing capacity of an affected transportation corridor or transportation management zone is sufficient to accommodate the projected transportation impacts of a proposed development; or that transportation system improvements, strategies, or other mitigation measures which will achieve or maintain an operating level at or above the applicable level of service for the affected transportation corridor or management zone: and are planned, reasonably funded, and scheduled for completion no later than six years after development approval as reflected in the most recent version of the Six-Year Street Plan; and will be available and complete no later than six years after development approval, as provided by a voluntary financial commitment (where appropriate) by the applicant that is in place at the time development is approved by the Development Review Authority.

Conditional Use. An activity specified by this title as a principal or an accessory use, permitted when authorized by the appropriate approval authority and subject to certain conditions.

Contiguous. Means the same as abutting.

Contributing. A property which dates to the historic period and retains sufficient physical integrity so as to convey its historic character.

Contributing Area. When referring to wetlands, the land and/or water area adjacent to a wetland that drains into that wetland.

Conversion Option Harvest. A timber harvest as established in Washington State Department of Natural Resources Forest Practices Regulations and Section 20.450.035 VMC, Landscaping and Tree Conservation, whereby a property owner is allowed to harvest a limited amount of timber from their property within the City of Vancouver, while still maintaining the rights to convert their property to a use inconsistent with growing timber.

Conveyance. A mechanism for transporting water or other liquids from one point to another, including pipes, ditches, and channels.

Cottage Court. Residential units on a lot with common open space.

Co-tenant. A person who resides with the applicant for the deferral and who has an ownership interest in the residence.

Court. An open, uncovered, and unoccupied space within an allotted property line.

Critical Aquifer Recharge Areas. Areas with a critical recharging effect on aquifers used for potable water as defined by the Washington State Growth Management Act. Critical aquifer recharge areas are regulated under Chapter 14.26 VMC.

Critical Areas. Critical areas include fish and wildlife habitat conservation areas, wetlands, frequently flooded areas, critical aquifer recharge areas, and geologic hazard areas as defined by the Washington State Growth Management Act. Critical aquifer recharge areas are regulated under Chapter 14.26 VMC. The others are regulated under Chapter 20.740 VMC.

Critical Facility. Facilities that serve vulnerable populations, house emergency services, meet the definition of a Class I or Class II Operation under Chapter 14.26 VMC, or perform other functions that would pose significant safety issues in even a slight landslide, flooding, erosion, seismic, or other natural hazard event. Critical facilities include, but are not limited to: schools, nursing homes, hospitals, police, fire, and emergency response installations, installations which produce, use, or store hazardous materials.

Critical Root Zone. The area where the tree's roots are located. This root zone is generally the area surrounding a tree trunk at a distance equal to one foot for every inch of tree diameter at breast height (dbh). This area is described as the radius of a circle around the tree.

Crown. The area of a tree containing leaf- or needle-bearing branches.

Crown Cover. The area within the drip line or perimeter of the foliage of a tree.

Cul-de-Sac. The circular turnaround at the end of a dead-end street.

Cultural Resources. The historic or prehistoric or archeological sites and standing structures, cemeteries, burial grounds and funerary objects and distributions of cultural remains and artifacts.

Decibels (dB). The measure of noise loudness on a scale weighted to approximate human ability to perceive sound (A). Each decibel is a measure of the difference in energy of a sound compared to another sound which is used as a reference. The reference sound is barely audible to the human ear, and each interval of 10 decibels indicates sound energy ten times greater than before. The A-weighted scale generally places zero dB at the threshold of hearing and 135 dB at the threshold of pain.

Dedication. The limited grant by a property owner allowing the use of property by the public for specified purposes by means of a deed or transfer to the city.

Dedication, Fee In Lieu Of. Payments in cash as an alternative to dedication of land or construction of improvements.

Deed. A legal document conveying ownership of real property.

Demolish. To raze, destroy, dismantle, deface or in any other manner cause partial or total ruin of a structure or other improvement.

Density. A measurement of ratio comparing the number of dwelling units with land area in relationship to a specified amount of land, expressed as the number of residential dwelling units per acre of land or the amount of land area expressed in the square feet of land assignable to each dwelling unit in a residential development.

Density, Base. The number of whole dwelling units divided by the net acreage of lot area included within the development.

Density, Maximum. Maximum Density refers to the greatest allowable density of residential development in units per acre specific to each Base Zone District.

Density, Minimum. Minimum Density refers to the least allowable density of residential development in units per acre specific to each Base Zone District.

Density, Net. The development density derived by dividing the net buildable area of the subject property (gross area less the total aggregate area required by the city for public or private streets, schools or other public facilities, critical areas, critical root zones, BPA easements, water detention/retention ponds, public open space, recreation facilities dedicated as an integral part of the development) by the applicable lot size or area per unit.

Density, Gross. The development density derived by dividing the gross area of the subject property by the applicable minimum lot size.

Department. The Community Development Department, Long Range Planning Department, Public Works Department, or any division, subdivision, or organizational unit of the city established by ordinance, rule or order.

Destroy any tree. To damage, disfigure or cause injury or death which may include, but not be limited to, topping, excessive pruning not consistent with nationally-accepted standards, poisoning, and trenching or excavating in such a manner as to make the tree root system no viable.

Detached Sidewalks. A sidewalk separated from the back of curb by a uniform width planting strip.

Developer. Any person, firm or corporation undertaking the development of any parcel of land.

Development. Any humanmade change to improved or unimproved real estate including but not limited to: mining, dredging, filling, drilling, grading, paving, or excavation, storage of equipment or materials; any subdivision or short platting of land; the construction or re-construction of residential, commercial, industrial, public or any other building or building space, and the placement of all types of manufactured homes defined herein. Development also includes the change in use of a building or land if approval is required pursuant to the Vancouver Municipal Code, Title 17 (Building Code). As related to the Tree Conservation Ordinance, development shall mean the division of a parcel of land into two or more parcels; the construction, reconstruction, conversion, structural alteration, relocation, or enlargement of any structure; any mining, excavation, landfill, clearing or land disturbance.

Development Application. Any application (including supporting materials) for approval of a development to which the provisions of Title 20 VMC apply.

Development Review Authority. The Planning Official, the City Hearing Examiner, the Planning Commission, or City Council, each having authority to approve a development application pursuant to Title 20 VMC.

Diameter at Breast Height (DBH). A tree's diameter in inches at 4 1/2 feet above the ground. On multi-stemmed or -trunk trees, the diameter shall be the diameter equivalent to the sum of trunk areas measured at 4 1/2 foot above the ground.

Direct-to-Home Satellite Service. The distribution or broadcasting of programming or services by satellite directly to the subscriber's premises without use of ground-receiving or distribution equipment, except at the subscriber's premises or in the uplink process to the satellite.

Disturbance Area. Regarding archaeological resource protection, the geographical area in which archaeological resources could potentially be adversely impacted by a proposed ground-disturbing action or activity. It includes equipment or material staging areas; utility installation areas; temporary roads or haul routes; or other areas outside of the proposed building footprint(s) that could be disturbed during construction. The disturbance area shall not be smaller, and will generally be larger than the area of the property proposed for development. In no case shall the disturbance area be smaller than one acre or the area of the parcel(s) upon which the property proposed for development is located, whichever is less.

Dog Day Care. A facility where dogs may be groomed, trained, exercised, and socialized, but not kept or bred, sold, or let for hire.

Domestic Animal. Any animal other than livestock that lives and breeds in a tame condition including, but not limited to: dogs, cats, small birds and other animals kept as pets.

Doorway Identification Nameplates. A nonelectric sign that is limited to the name, address, and number of the building, institution or person and is limited to the activity carried on in the building or institution or to the occupancy of the person.

Downed Woody Vegetation. Shrubs, trees, or their branches that have fallen and are on the ground or in, across, or dangling above streams, rivers, lakes, or ponds; also known as large woody debris.

Drive-Through Facility. A facility or structure that is designed and intended to allow drivers to remain in their vehicles before and during participation in an activity on the site.

Driveway. A private way providing ingress and egress from one or two lot parcels or tracts to a public or private street.

Dwelling. A single unit providing a complete independent living space for one or more persons, including permanent facilities for living, sleeping, eating, cooking and sanitation.

Dwelling, Houseboat Moorage. A facility that provides moorings for houseboats.

Dwelling, Single-Family. A building designed or used for residence purposes by not more than one household and containing one dwelling unit only. Such dwelling units may be either detached (i.e., free-standing) or attached (i.e., sharing) common walls with other such units.

Dwelling, Single-Room Occupancy Housing (SRO). A building wherein furnished rooms without cooking facilities are rented for compensation to three or more nontransient persons not included in the family unit of the owner or tenant of the premises.

Dwelling, Two-Family, or Duplex. A building designed or used for residence purposes by not more than two households and containing two dwelling units.

20.150.040B Meanings of Specific Words and Terms E through H.

Early Notice. The city's response to an applicant stating whether it considers issuance of a determination of significance likely for the applicant's proposal.

Easement. A grant of one or more of the property rights by the property owner to and/or for use by the public, a corporation or another person or entity.

Ecology. The Washington State Department of Ecology.

Egress. An exit from a building or site.

Electric Vehicle. Any on-road motor vehicle that operates, either partially or exclusively, on electrical energy from the grid, or an off-board source, that is stored on board for motive purpose. Electric vehicle includes: (1) a battery electric vehicle; (2) a plug-in hybrid electric vehicle; (3) a neighborhood electric vehicle; and (4) a medium-speed electric vehicle. (per RCW 46.04.320). Electric vehicle excludes, an electric personal assistive mobility device or electric powered wheelchair, an electric-assisted bicycle as defined in RCW 46.04.169, or a personal delivery device as defined in RCW 46.75.010.

Elevated Building. For insurance purposes, a nonbasement building that has its lowest elevated floor raised above ground level by foundation walls, shear walls, posts, piers, pilings, or columns.

Elevation, Architectural. A scale drawing of the side, front or rear of a structure.

Elevation Certificate. An administrative tool of the National Flood Insurance Program (NFIP) that can be used to provide elevation information, to determine the proper insurance premium rate, and to support a request for a letter of map amendment (LOMA) or letter of map revision based on fill (LOMR-F).

Emergency Repair. The work necessary to prevent destruction or dilapidations to real property or structural appurtenances thereto immediately threatened or damaged by fire, flood, earthquake or other disaster.

Emergency Housing (EH). EH is defined as temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement.

Emergency Shelter (ES). ES is defined as a facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelter may not require occupants to enter into a lease or an occupancy agreement. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations.

Emergent wetland. A wetland with at least 30% of the surface area covered by erect, rooted, herbaceous vegetation as the uppermost vegetative strata.

Employees. Refers to all persons, including proprietors, working on the premises.

Employer. A sole proprietorship, partnership, corporation, unincorporated association, cooperative, joint venture, agency, department, district or other individual or entity, whether public, nonprofit or private, that employs workers.

Encroachment. Encroachment refers to any part of a main building or structure that extends from the façade over build-to lines or setback lines onto the lot or into any public right-of-way.

Endangered and Threatened Species, Federally Designated. Fish and wildlife species identified by the U.S. Fish and Wildlife Service or NOAA Fisheries as threatened or endangered under the Endangered Species Act, 16 USC Section 1531, et seq.

Endangered, Threatened and Sensitive Species, State Designated. Fish and wildlife species native to the State of Washington and identified by the Washington Department of Fish and Wildlife as sensitive, threatened, or endangered species.

Energy-Efficient Construction. A structure designed and built which encourages the efficient use of energy. Construction standards qualifying for this shall be as specified by the State Energy Code. Design or construction methods that can be proven to provide equivalent or better energy conservation performance may be allowed as an alternative.

Engineer. An individual licensed by the State of Washington to practice civil engineering.

Enhancement. Actions performed to improve the condition of an existing degraded critical area or buffer so that the functions provided are of a higher quality. See also Wetland Enhancement.

Enlargement. An increase in size of an existing structure or use, affecting the physical size of the property, building, parking, and other improvements.

Entertainment. Regarding Adult Businesses, any exhibition or dance of any type, pantomime, modeling or any other performance.

Entertainer. Regarding Adult Businesses, means any person who provides sexually-oriented adult entertainment within a public place of amusement whether or not a fee is charged or accepted for such entertainment.

Entrance, Pedestrian. Pedestrian entrance refers to the primary access point to a building, lot, or site that is designed for people on foot or mobility device, typically oriented toward the public sidewalk or street and clearly distinguished from vehicular access.

Erect. To build, construct, attach, hang, place, inscribe, suspend or affix any sign or to paint any wall sign.

Erosion Control. The design and installation of measures to control erosion and sedimentation during and after construction and to permanently stabilize soil exposed during and after construction using a combination of structural control measures, cover measure, and construction practices.

Essential Facility (Applies in Frequently Flooded Areas). This term has the same meaning as “essential facility” defined in ASCE 24. Table 1-1 in ASCE 24-14 further identifies building occupancies that are essential facilities.

Essential Public Facilities. Public facilities and privately-owned or operated facilities serving a public purpose that are typically difficult to site. They include but are not limited to: airports, state education facilities, state or regional transportation facilities, prisons, jails, other correctional facilities, and solid waste handling facilities. These facilities are of state-wide and regional significance, as opposed to facilities which only serve Clark County. Therefore, local transit service is not considered an essential public facility. Essential public facilities will be allowed in locations appropriate for the services provided and the people served.

Exception. Permission to depart from a specific design standard in this title.

Existing Manufactured Home Park or Subdivision (Applies in Frequently Flooded Areas). A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including, at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed before the effective date of the floodplain management regulations adopted by the community.

Exotic. Any species of plants or animals that are not native to the area.

Expansion to an Existing Manufactured Home Park or Subdivision (Applies in Frequently Flooded Areas). The preparation of additional sites by the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads).

Façade. Any exterior building face, from corner to corner and finished floor to eave, exclusive of any roof area.

Face. To front upon.

Feature. An artifact or set of artifacts which, due to its size and complexity, loses its integrity when moved, and therefore, cannot be transported as a unit to a laboratory or museum for study or display (e.g., a hearth, an ash lens, a storage pit, a cache of related artifacts, or a house floor).

Fence, Sight-Obscuring. A fence or evergreen planting constructed or arranged in such a way as to obstruct vision.

Findings. A written statement of the facts determined to be relevant by the approval authority as the basis for making its decision. The approval authority applies the relevant facts to the approval criteria or standards to reach its decision.

Fish and Wildlife Habitat Conservation Areas. Fish and Wildlife Habitat Conservation Areas include habitat for Endangered, Threatened and Sensitive species; Priority Habitats and areas associated with Priority Species; Riparian Management Areas; Habitats of Local Importance, and water bodies.

Fish Habitat. Habitat which is used by any fish at any life stage at any time of the year, including potential habitat likely to be used by fish which could be recovered by restoration or management and includes off-channel habitat. (WAC 222-16-030)

Flood or Flooding.

1. A general and temporary condition of partial or complete inundation of normally dry land areas from:
    a. The overflow of inland or tidal waters.
    b. The unusual and rapid accumulation or runoff of surface waters from any source.
    c. Mudslides (i.e., mudflows) which are proximately caused by flooding as defined in subsection (1)(b) of this definition and are akin to a river of liquid and flowing mud on the surfaces of normally dry land areas, as when earth is carried by a current of water and deposited along the path of the current.
2. The collapse or subsidence of land along the shore of a lake or other body of water as a result of erosion or undermining caused by waves or currents of water exceeding anticipated cyclical levels or suddenly caused by an unusually high water level in a natural body of water, accompanied by a severe storm, or by an unanticipated force of nature, such as flash flood or an abnormal tidal surge, or by some similarly unusual and unforeseeable event which results in flooding as defined in subsection (1)(a) of this definition.

Flood Elevation Study. An examination, evaluation and determination of flood hazards and, if appropriate, corresponding water surface elevations, or an examination, evaluation and determination of mudslide (i.e., mudflow) and/or flood-related erosion hazards. Also known as a Flood Insurance Study (FIS).

Flood Insurance Rate Map (FIRM). The official map on which the Federal Insurance Administration has delineated both the areas of special flood hazards and the risk premium zones applicable to the community. A FIRM that has been made available digitally is called a Digital Flood Insurance Rate Map (DFIRM).

Floodplain. The relatively flat area or lowlands adjoining the channel of a river, stream, watercourse, or other similar body of water that has been or may be susceptible to being inundated by floodwater. The floodplain includes the areas of special flood hazards (frequently flooded areas).

Floodplain Administrator. The community official designated by title to administer and enforce the floodplain management regulations.

Floodplain or Flood-Prone Area. Any land area susceptible to being inundated by water from any source. See "Flood or flooding."

Flood-Proofing. Any combination of structural and nonstructural additions, changes, or adjustments to structures which reduce or eliminate risk of flood damage to real estate or improved real property, water and sanitary facilities, structures, and their contents. Flood-proofed structures are those that have the structural integrity and design to be impervious to floodwater below the base flood elevation.

Floodway. The channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. Also referred to as "regulatory floodway."

Floor Area. The area of all floors, finish wall-to-finish wall, included in surrounding walls of a building.

Floor Area, Gross. The total enclosed area of all floors of a building measured to the outside face of the structural members in exterior walls and including halls, stairways, elevator shafts at each floor level, service mechanical equipment rooms, habitable basement or attic areas, and structured (not surface) areas for vehicle parking and loading.

Floor Area Ratio (FAR). A mathematical expression determined by dividing the total floor area of a building by the total area of the lot. It is determined by dividing the total gross floor area of all the buildings on a lot by the area of that lot, excluding public easements and right-of-ways, landscaped areas required under the requirements of this chapter and Chapter 20.740, Wetlands and Drainage Areas. For example, a floor area ratio of 2 to 1 (or 2:1) means that there are 2 square feet of gross floor area for every 1 square foot of lot area.

Frequently Flooded Areas. Areas of special flood hazards.

Front. Each side of a lot abutting a public street except state or federally designated highways.

Frontage. That portion of a parcel of property that abuts a dedicated public street, highway or approved private street, from property line to property line.

Frontage Type. Frontage type refers to one or more distinct architectural features on a building's frontage that supports its use and establishes how it relates to the public realm.

Fronting Street. Shall mean a public or private road providing for vehicular access to the boundary of a parcel of real property being proposed for development.

Full-time Employee. A person other than an independent contractor scheduled to be employed on a continuous basis for fifty-two weeks a year for an average of thirty-five hours or more per week.

Full-time Equivalent (FTE). The equivalent number of full-time students attending a post secondary school such as a trade school, college or university.

Fully Complete. Regarding land use applications, the determination by the Review Authority that the application and associated documentation contain sufficient information and detail to reach a final decision; such determination shall not be interpreted to mean that the application meets applicable standards.

Fully Detached. A Fully Detached building is one that is fully stand alone on its lot with no shared walls with any adjacent structures.

Functionally Dependent Use (Applies in Frequently Flooded Areas). A use which cannot perform its intended purpose unless it is located or carried out in close proximity to water. The term includes only docking facilities, port facilities that are necessary for the loading and unloading of cargo or passengers, and ship building and ship repair facilities, and does not include long-term storage or related manufacturing facilities.

Functionally Disabled. With respect to a person who has a physical or mental impairment which substantially limits one or more of such person's major life activities; has a record of having such an impairment, or being regarded as having such an impairment. Such term does not include current, illegal use of or addiction to a controlled substance.

Functions or Functions and Values of Fish and Wildlife Habitat Conservation Areas. Functions or functions and values are the beneficial roles served by Fish and Wildlife Habitat Conservation Areas. Fish and Wildlife Habitat Conservation Areas provide habitat for breeding, rearing, foraging, protection and escape, migration, and over-wintering. Fish and Wildlife Habitat Conservation Areas affect the quality of habitat by providing complexity of physical structure, supporting biological diversity, regulating stormwater runoff and infiltration, removing pollutants from water, and maintaining appropriate temperatures.

Functions or Functions and Values of Wetlands. Functions or functions and values are the beneficial roles served by wetlands. Wetlands improve water quality, maintain watershed hydrology (for example, by providing base stream flow during dry periods and controlling flooding), and provide habitat.

Garage, Private. A paved, covered, and enclosed motor vehicle parking space with a locking door, either attached or detached from the living unit. An accessory building or an enclosed accessory portion of the main building designed and/or used for shelter or storage of vehicles, boats and/or other vehicles owned or operated by the occupants of the main building.

Garage, Public. A structure or portion thereof other than a private or community garage used for the storage of self-propelled vehicles or trailers. Any garage, other than a private garage, open to use by members of the public.

Geographic Barrier. A natural or constructed land form or feature such as, but not limited to: a promontory, a ravine, a large or fast-moving body of water or a dike.

Geologic Hazard Areas. Geologic hazard areas include landslide, seismic, and erosion hazard areas designated pursuant to Section 20.720.130(A) VMC.

Grade. As defined in the City Adopted Building Code(s).

Grading. Any excavation, filling or combination thereof.

Grading Permit. The permit required under Chapter 70 of the City Adopted Building Code(s).

Gross Floor Area. Means the same as floor area.

Gross Leasable Area (GLA). The total floor area designed for both tenant occupancy and exclusive use. This includes both owned and leased areas.

Ground-disturbing Action or Activity. Any development, construction, or related operation which could alter the site, including but not limited to: tree or tree stump removal, road or building construction or grading.

Ground Floor. Referring to the story of a building closest to the curb level that contributes to the character of the pedestrian realm.

Ground Floor, Activation. Methods used to promote pedestrian activity, visual interest, and street-level engagement at the ground floor. Such activation can include retail shops, restaurants, community spaces, art displays, or other amenities that encourage public interaction and enhance the vibrancy of the streetscape.

Ground Floor to Ceiling Height. The vertical distance measured from the top of the finished floor to the underside of the lowest part of the ceiling structure. This measurement dictates the net useable open space inside a room, excluding structural beams or plumbing, and directly influences air circulation, natural light, and perceived volume.

Group Living. Living facilities for groups of unrelated individuals that include at least one person residing on the site who is responsible for supervising, managing, monitoring and/or providing care, training or treatment or residents

Guyed Tower. Any wireless communication support, using guy wires which are permanently anchored.

Habitable Floor Area. The total heated floor area in a structure devoted to living, sleeping, eating or cooking. Bathrooms, toilet rooms, closets, halls, storage or utility spaces, and other similar areas are not counted as habitable floor area.

Habitats of Local Importance. Fish and Wildlife Habitat Conservation Areas which are not designated as Priority Habitats and Species by the Washington Department of Fish and Wildlife but are designated as locally significant by the city.

Hard surface. Hard surface is an impervious surface, a permeable pavement or a vegetated roof.

Hazardous Material. Any product, substance, commodity or waste in liquid, solid or gaseous form that exhibits a characteristic that presents a risk to water resources. Risk may be due to ignitability, toxicity, reactivity, instability, corrosivity, or persistence. This definition extends to all "dangerous wastes" and "hazardous substances" that are defined in WAC 173-303 (State Dangerous Waste Regulations). It also includes the chemicals and/or substances that are defined in the Federal Emergency Planning and Community Right to Know Act (EPCRA) and/or the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Hazardous Waste. Means all dangerous and extremely hazardous waste as defined in RCW 70.105.010 except for moderate risk waste.

Hazardous Waste Storage. The holding of dangerous waste for a temporary period as regulated by State Dangerous Waste Regulations, Chapter 173-303 WAC.

Hazardous Waste Treatment. The physical, chemical or biological processing of dangerous waste to make wastes nondangerous or less dangerous, safer for transport, amenable for energy or material resource recovery, amenable for storage, or reduced in volume.

Hazardous Waste Treatment and Storage Facility, Off-Site. The treatment and storage facilities that treat and store wastes from generators on properties other than those on which the off-site facilities are located.

Hazardous Waste Treatment and Storage Facility, On-Site. The treatment and storage facilities that treat and store wastes generated on the same geographically contiguous or bordering property.

Headwaters. Springs, lakes, ponds or wetlands that provide significant sources of water to a stream.

Healthy Soil. Soil that is of good quality with the capacity to sustain plant, animal, and human life by providing nutrients, air and water space to infiltrate, pollutant absorption and filtering, and habitat.

Heritage Tree. A tree or group of trees designated as such by the city in Chapter 20.450.035 VMC, Landscaping and Tree Conservation.

High-Intensity Land Use. Land uses which are associated with high levels of human activity or substantial habitat impacts including Residential, Commercial, and Industrial zoning districts.

Historic District. A geographically definable area possessing a significant concentration, linkage or continuity of sites, buildings, structures or objects united by past events or aesthetically by plan or physical development.

Historic Structure (Applies in Frequently Flooded Areas). Any structure that is:

1. Listed individually in the National Register of Historic Places (a listing maintained by the Department of the Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the National Register;
2. Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary to qualify as a registered historic district;
3. Individually listed on a state inventory of historic places in states with historic preservation programs which have been approved by the Secretary of the Interior; or
4. Individually listed on a local inventory of historic places in communities with historic preservation programs that have been certified either:
    a. By an approved state program as determined by the Secretary of the Interior, or
    b. Directly by the Secretary of the Interior in states without approved programs.

Home Occupation. A use conducted entirely within a residential building, which use is clearly incidental and secondary to the use of the dwelling for dwelling purposes, and complies with the criteria established by Section 20.430.060 VMC, Accessory Use Types and Standards.

Homeowners Association. A nonprofit corporation or association operating under a recorded land agreement through which:

1. Each person owning or purchasing a lot in a planned unit or other described land area is automatically by such ownership or purchase a member; and
2. Each lot is automatically subject to a charge for a proportionate share of the expenses for the organization's activities, such as maintaining a common area and improvements.

Household. An individual, two or more persons related by blood or marriage, a group of two or more disabled residents protected under the Federal Fair Housing Amendment Act of 1988, adult family homes as defined under Washington State law, or a group living arrangement where six or fewer residents receive supportive services such as counseling, foster care, or medical supervision at the dwelling unit by resident or nonresident staff. Up to six residents not related by blood or marriage who live together in a single-family dwelling or in conjunction with any of the above individuals or groups, shall also be considered a household. For purposes of this definition, minors living with parent or legal guardian shall not be counted as part of the maximum number of residents.

Household Living. Living facilities for small groups (households) of people who are related or unrelated. Tenancy is longer than 30 calendar days. Household structures include single-family detached and attached dwellings; duplexes; middle housing (3-6 plex, townhouse, rowhouse, stacked flats, cottages) multifamily dwellings; and manufactured/modular homes. (See Section 20.450.080 and 20.450.085, respectively, for additional standards for cottage and manufactured/modular home developments.) Most types of senior housing (e.g., congregate care or assisted living) are considered to be household living if residents live in self-contained units, even if there are also shared facilities within the building. Household living may also include permanent supportive housing, single-room occupancy (SROs) facilities and co-living housing. The maximum number of people who may reside in any given dwelling unit shall be determined by the city adopted building code.

Hydric Soil. Soil that is saturated, flooded or ponded long enough during the growing season to develop anaerobic conditions in the upper part. The presence of hydric soil shall be determined following the methods described in the Wetlands Delineation Manual defined in this chapter.

Hydrogeomorhpic (HGM) Classification. System used to classify wetlands based on the position of the wetland in the landscape (geomorphic setting), the water source for the wetland, and the flow and fluctuation of the water once in the wetland.

Hydrophytic Vegetation. Macrophytic plant life growing in water or on a substrate that is at least periodically deficient in oxygen as a result of excessive water content. The presence of hydrophytic vegetation shall be determined following the methods described in the Wetlands Delineation Manual defined in this chapter.

20.150.040C Meanings of Specific Words and Terms I through L.

Impact. The effect of an activity on designated critical areas, their buffers or sensitive resources.

Impact Fee. The fee levied as a condition of issuance of a building permit or development approval to support necessary public improvements affected by the development such as the transportation system, park acquisition and development, and schools.

Impact, Indirect. Impacts resulting from activities in the environs of a designated critical area, its buffer or a sensitive resource. Indirect impacts can result from construction activities nearby (e.g., producing sediment that enters a wetland or noise that disturbs a species listed under the Endangered Species Act). Other examples of indirect impacts include: changing the hydrology of an area such that it reduces water flow to a wetland or water body; introducing a barrier to wildlife movement through an area (such as a road or facility with bright night lighting); or reducing the size of a resource such that it can no longer perform the functions at its former level. The relationship of a designated critical area, buffer or sensitive resource to its surroundings must be considered in evaluating indirect impacts.

Impact, Permanent. Impacts that result in the permanent loss of a designated critical area, its buffer or a sensitive resource.

Impact, Temporal. The long-term effects of an activity or development where functions can be replaced eventually but cannot and do not achieve a similar functionality in a short period of time. For example, replacing the functions of song bird habitat in a tree canopy provided by a 50 year-old palustrine forested wetland, may take over 20 years to develop at the impact site.

Impact, Temporary. Short-term effects lasting for a limited time and where functions can be replaced in a relatively short period of time (about one year). For example, replacing the functions of habitat for small mammals or water quality for palustrine emergent (PEM) wetlands (those principally vegetated with grasses and forbs) may be done in one growing season if the disturbance is not severe.

Impervious Surface or Area. A nonvegetated surface area that either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development. A nonvegetated surface area which causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development. Common impervious surfaces include, but are not limited to, structures, roof tops, walkways, patios, driveways, carports, parking lots or storage areas, concrete or asphalt paving, gravel roads, packed earthen materials, haul roads and soil surface areas compacted by construction operations, and oiled or macadam or other surfaces which similarly impede the natural infiltration of stormwater.

Improvement. Any permanent structure including building, paving, or infrastructure that becomes part of, placed upon, or is affixed to property.

Ingress. Access or entry.

Inordinate Light Source. Lighting source that is exceptionally bright or outside normal industry standards as found by the Planning Official.

Integrated Pest Management. A sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks.

Intermittent stream. Surface streams with no observable flow during 30 consecutive calendar days in a normal water year.

Interior Circulation. Interior Circulation refers to the passages inside a building that allow for the movement of people including entrances, hallways, staircases, and elevators.

Irrigation System, Automated. A system for delivering water to plants using a timer, sensor, or other electronic device that requires minimal human or manual intervention.

Junkyard/Salvage Yard. A place where waste, discarded, or salvaged materials are bought, sold, exchanged, baled, packed, disassembled, or handled, including auto wrecking yards, house wrecking yards, used lumber yards, and places where such uses are conducted entirely within a completely enclosed building, but not including pawn shops or establishments for the sale, purchase, or storage of used furniture and household equipment, used cars in operable condition, or salvaged materials incidental to manufacturing operations.

Kennel. Shall mean any premises on which four or more dogs older than 5 months are kept, excluding veterinary clinics, animal hospitals, and dog daycare facilities.

Kitchen. Any room or rooms, or portion thereof, used or intended to be used for cooking or the preparation of food.

Land-disturbing activity. Regarding erosion control regulations, any activity that results in a change in the existing soil cover (both vegetative and nonvegetative) or existing soil topography. Land-disturbing activities include, but are not limited to, demolition, reconstruction, construction, clearing, grading, filling, and excavation.

Land Form Alteration. Any man-made change to improved or unimproved property including, but not limited to, the addition of buildings or other structures; mining; quarrying; dredging; filling; grading; earthwork construction; stockpiling of rock, sand, dirt or gravel or other earth material; paving; excavation or drilling operations located within the area of special flood hazard.

Landscaping. An enhanced section of pervious ground for aesthetic, ecological and economic value with groundcover, shrubs or trees. Impervious surfaces are not considered landscaping.

Lattice Tower. A wireless communications support structure, which consists of a network of vertical and horizontal supports and crossed metal braces, forming a tower that is usually triangular or square in cross-section.

Ldn. Annual Average Day/Night Sound Level. The "Ldn, Day/Night Sound Level," in decibels, is the 24-hour logarithmic average sound level, from midnight to midnight, obtained after adding 10 decibels to sound levels in the night from midnight to 7:00 a.m., and from 10:00 p.m. to midnight (0000 to 0700, and 2200 to 2400 hours), and then logarithmically averaged day-to-day over a 12-month period.

Legal Owner. The owner of record, as shown by the records of Clark County.

Light-Impact Recreation. Light-Impact Recreation refers to passive recreational activities that generally do not have direct impact on the natural environment or require infrastructure, such as walking trails or picnic areas.

Livestock. Any horse, beef or dairy cattle, sheep, goat, llama, alpaca, mule, jack, jenny, burro, domesticated hare, rabbit, emu, ostrich, poultry or similar animal.

Load Space or Loading Area. An off-street space or berth on the same lot or parcel with a building or use, or contiguous to a group of buildings or uses, for the temporary parking of a vehicle which is loading or unloading, merchandise or materials.

Local Public Facility. A land use designed to serve the needs of the local neighborhood or community affected by the impact(s) of development. Local Public Facilities include, but are not limited to: elementary, middle, and high schools; fire stations; police stations; parks; and transit facilities. Local Public Facilities shall not include land use(s) of regional or community-wide significance, such as airports, colleges, hospitals, regional parks or community centers.

Logo. A group of letters, typically stylized, or symbols that represent a word, group of words or business name.

Lot Area. The computed area contained within the lot lines; said area to be exclusive of street or alley rights-of-way or access easements, Bonneville Power Administration (BPA) easements, water detention/retention ponds, critical areas and associated buffers and the critical root zone of trees to remain on site.

Lot, Corner. A lot abutting upon two or more streets at their intersection, or upon two parts of the same street; such street or parts of the same street forming an interior angle of less than 135° within the lot lines.

Lot Coverage. That percentage of the total lot area covered by structures, including all projections except eaves, balconies, bay windows, or uncovered deck 42 inches or less above grade.

Lot Depth. The average distance measured from the front lot line to the rear lot line. In the case of a corner lot, the depth shall be the length of its longest side lot line.

Lot, Estate. A lot in a subdivision that contains a house and outbuildings constructed prior to the subdivision. The estate lot cannot be larger than one acre in area, and is exempt from the minimum density requirements of any residential district.

Lot, Flag. A lot generally in the shape of a flag where access is typically by a narrow, private right-of-way or driveway.

Lot, Interior. A lot or parcels of land other than a corner lot.

Lot, Legal. A parcel of land used or which is capable of being used under the regulations of this title, lawfully created as such in accordance with the subdivision laws or ordinances in effect at the time of its creation.

Lot Line. Any line bounding a lot as herein defined.

Lot Line, Front. The property line abutting a street or the edge of a private street, or primary access. For corner lots the front line is that with the narrowest frontage. When the lot line abutting a street is curved, the front lot line is the chord or straight line connecting the ends of the curve. For a flag lot, the front lot line is the shortest lot line adjoining the pole portion of the lot, excluding the unbuildable portion of the pole.

Lot Line, Rear. A lot line that is opposite and most distant from the front lot line.

Lot Line, Side. Any lot line that is not a front or a rear lot line.

Lot of Record. A lot shown on the records of the County Auditor at the time of the passage of an ordinance or regulation establishing the zoning district in which the lot is located.

Lot Size, Minimum. The area determined to be the minimum average lot size for each underlying zoning district prior to application of any lot size reduction allowed.

Lot, Through. Lot having front and rear frontage on two streets and/or highways. Lots with rear alley frontage shall not be considered through lots.

Lot Split. An existing residential lot split to create a new residential lot.

Lot Width. The horizontal distance between the side lot lines measured within the lot boundaries or the average horizontal distance measured halfway between the front and rear setback lines.

Low Impact Development (LID). Low impact development is a stormwater and land management strategy that strives to mimic pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration by emphasizing conservation, use of on-site natural features, site planning, and distributed stormwater management practices that are integrated into a project design.

Low Impact Development Best Management Practices (BMPs). Low impact development best management practices are distributed stormwater management practices, integrated into a project design, that emphasize pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration. LID BMPs include, but are not limited to, bioretention, rain gardens, permeable pavements, roof downspout controls, dispersion, soil quality and depth, vegetated roofs, minimum excavation foundations, and water re-use.

Low Impact Development Principles. Low impact development principles are land management strategies that emphasize conservation, use of onsite natural features, and site planning to minimize impervious surfaces, native vegetation loss, and stormwater runoff.

Lowest Floor. The lowest floor of the lowest enclosed area (including basement). An unfinished or flood resistant enclosed area below the base flood elevation, usable solely for parking of vehicles, building access or storage, in an area other than a basement area, is not considered a building's lowest floor, provided that such enclosure is not built so as to render the structure in violation of the applicable nonelevation design requirements of Section 20.720.120(J)(8)(c), (J)(10)(d), or (J)(11)(e) VMC.

Low-Income Housing. Housing for which the monthly housing expense is no greater than thirty percent of eighty percent of the median family income adjusted for family size for Clark County, Washington, as reported by the United States Department of Housing and Urban Development. For multi-family housing, this definition shall apply only to the number of units within such housing development as are required to comply with this limitation on monthly housing expense.

Low-Intensity Land Use. Land uses which are associated with low levels of human activity or low habitat impacts, including Open Space Greenway: Lettuce Fields and Vancouver Lake Lowlands and Open Space Natural zoning districts.

Low Noise Impact. Interior noise levels of Ldn 45 or less, considered for the purposes of Chapter 20.560 VMC, Noise Impact Overlay District, as acceptable for residential purposes.

20.150.040D Meanings of Specific Words and Terms M through P.

Mail. Includes mail delivered through a postal service or electronic mail.

Main. See Water Main.

Maintain. To allow to continue in existence. When the context indicates, the word shall mean to preserve and care for a structure, or to improve in condition an area to such an extent that it remains attractive, safe, and presentable and carries out the purpose for which it was installed, constructed or required.

Major Thoroughfare. The principal, minor, collector arterials, and State highways, as shown on the Arterial Street Plan adopted in compliance with Chapter 35.77 RCW.

Major Transit Stop. A Major Transit Stop refers **to** any station serving as a stop on an existing or planned high-capacity transit system route, including fixed guideway and bus rapid transit systems.

Management Plan. A plan detailing how operations and maintenance activities subject to the provisions of VMC 20.740 will be performed.

Manufacture. Includes production, processing, assembling, packaging or treatment of semi-finished or finished products from raw materials or previously prepared materials or components.

Manufactured Home: A dwelling unit constructed after June 15, 1976, built in accordance with department of housing and urban development Manufactured Home Construction and Safety Standards Act, which is a national, preemptive building code.

Manufactured Home, Modular: A dwelling unit (which may be in the form of a factory-built or manufactured housing permit as well as a standard building permit) constructed in a factory in accordance with International Building Code and bearing the appropriate gold insignia indicating such compliance. The term includes “pre-fabricated,” “panelized,” and “factory-built” units.

Manufactured Home Development. An existing site containing spaces with required improvements and utilities that are leased for the long-term placement of manufactured or modular homes. This term shall also include "mobile home parks" as that term is used in other titles of the Vancouver Municipal Code (VMC).

Manufactured Home Subdivision. An existing subdivision created for the placement of manufactured homes on individual lots.

Marquee. A roofed structure attached to and supported by the building and projecting over public property.

Master Plan. A comprehensive, long-range site plan for a development project. The project may be located on a single parcel or on several contiguous parcels which are owned by one or more parties working cooperatively and collectively, and is usually implemented in phases.

Mean Sea Level. For purposes of the National Flood Insurance Program, the vertical datum to which base flood elevations shown on a community’s Flood Insurance Rate Map are referenced.

Meandering Sidewalks. Those sidewalks separated by a nonuniform planting strip from the back of the curb.

Micro Facility. Regarding wireless communication facilities, a single antenna, or group of antennae, co-located on an existing tower, building or other appurtenance that is small in size and visually unobtrusive.

Middle Housing. Buildings that are compatible in scale, form, and character with single-family houses and contain two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, sixplexes, rowhouses/townhouses, stacked flats, courtyard apartments, and cottage housing. Middle housing shall be limited to three (3) or less floors above grade.

Mitigation. Mitigation is a six-step sequencing process used to reduce the severity of effects from activities that potentially affect sensitive resources:

1. Avoiding the impact altogether by not taking a certain action or parts of an action;
2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;

3. Rectifying the impact by repairing, rehabilitating or restoring the affected environment;
4. Reducing or eliminating the impact over time by preservation, and maintenance operations during the life of the action;
5. Compensating for the impact by replacing, enhancing or providing substitute resources or environments; and/or
6. Monitoring the impact and taking appropriate corrective measures.

Mitigation, Compensatory. Compensation for potential impacts to functions and values of critical areas (including fish and wildlife habitat, frequently flooded areas, geologic hazard areas, and wetlands) and their buffers.

Mixed-Use Development. The development of a tract of land, building or structure with a variety of complementary and integrated uses, such as, but not limited to, residential, office, manufacturing, retail, public or entertainment, in a compact urban form.

Mixed-Use Structure. A single structure containing at least two complementary, integrated, or mutually-supporting uses (such as housing, offices, manufacturing, retail, public service, or entertainment). The structure must achieve physical and functional integration within itself.

Moderate-Intensity Land Use. Land uses which are associated with moderate levels of human activity or substantial habitat impacts including PO and NA zoning districts.

Mode. Refers to the means of transportation used by employees, including single-occupant vehicle, carpool, vanpool, transit, bicycle, and walking.

Monopole Tower. A wireless communications support structure, consisting of a single pole to support antennae and connecting appurtenances.

National Register of Historic Places. The national listing of properties significant to the nation's cultural history because of their documented importance to history, architectural history, engineering or cultural heritage.

Naturally occurring ponds. Ponds less than twenty acres and their submerged aquatic beds that provide fish or wildlife habitat, including those artificial ponds intentionally created from dry areas in order to mitigate impacts to ponds. Naturally occurring ponds do not include ponds deliberately designed and created from dry sites, such as canals, detention facilities, wastewater treatment facilities, farm ponds, temporary construction ponds, and landscape amenities, unless such artificial ponds were intentionally created for mitigation.

Native. Native plants are those species on the City of Vancouver's Native Plant Species list (available from the Planning Official).

Native Vegetation. Vegetation that encompasses both that occurring naturally and vegetation well adapted to current and anticipated environmental conditions in this region.

New Construction. For the purposes of Section 20.720.120 VMC, Frequently Flooded Areas, "new construction" means structures for which the "start of construction" commenced on or after September 5, 2012.

New Manufactured Home Park or Subdivision (Applies in Frequently Flooded Areas). A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including, at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed on or after the effective date of adopted floodplain management regulations by the community.

Noise Contour. The graphic depiction of the spatial extent to which an average noise level affects the area surrounding a source of noise. The contour is a line depicting equal points of impact.

Noise Contour, 65 Ldn. The most current 65 Ldn Noise Contour, as annually updated by the Port of Portland for the Portland International Airport using the criteria and methodology adopted by the Federal Aviation Administration for the purpose of establishing noise contours as a part of airport planning, or as provided by other objective sources for noise generations other than the Portland International Airport.

Noise, Environmental. Shall mean the intensity, duration, and character of sounds from any land use, measured at the property line of the receiving property.

Noise Impact. The extent to which a level of noise interferes with the full utilization of land.

Nonconforming, Legal. A use of land, building, structure or use which lawfully existed at the time of the adoption of this title or of any amendment thereto, but which does not conform with the use or development regulations imposed by this title or such amendment thereto.

Noncontributing. A property which either does not date to the historic period or has not retained sufficient physical integrity so as to convey its historic character.

Normal water year. A twelve-month period (October 1-September 30) with average precipitation based upon data from the past 50 years.

Noxious weeds. Non-native plants which are destructive, competitive, and difficult to control as defined by the Washington State Noxious Weed Control Board.

Nudity. Regarding Adult Businesses, the showing of the human male or female genitals or pubic area, the showing of the female breast, with less than a fully opaque covering of any part of the nipple, or the showing of the covered male genitals in a discernibly turgid state.

Obligate, facultative wet, and facultative. Groupings of plants according to their frequency of occurrence in wetlands. Obligate wetland plants almost always (99% probability) occur in wetlands under natural conditions. Facultative wetland plants usually (67%-99% probability) occur in wetlands. Facultative plants are equally likely (34%-66% probability) to occur in wetlands or nonwetlands. Such groupings are more fully defined in the Wetlands Delineation Manual defined in this chapter.

Obstruction. Any dam, wall, embankment, levee, dike, pile, abutment, projection, excavation, channel modification, bridge, conduit, culvert, building, wire, fence, rock, gravel, refuse, fill, structure or matter which is in, along, across or projecting into any channel, watercourse or regulatory flood hazard area; and which may impede, retard or change the direction of the flow of water, either in itself or by catching or collecting debris carried by such water or which is placed where the flow of water might carry the same downstream to the damage of life or property.

Occupant. Any individual living or sleeping in a building or having possession of a building or space therein. Unless otherwise stated, occupant is synonymous with tenant.

Occupancy Certificate. A city certificate allowing the use of a building or structure after it has been determined that all the requirements of applicable ordinances have been met.

Off-Site Impact. A condition that creates, imposes, aggravates or leads to inadequate, impractical, unsafe or unhealthy conditions on a site proposed for development or on off-site property or facilities. This includes, but is not limited to, noise, glare, and odor.

Off-Site Improvement. Improvements required to be made off-site to address impacts identified from an application for development and including, but not limited to, road widening and upgrading, storm water facilities, and traffic system improvements.

100-Year Flood. The flood having a 1% chance of being equaled or exceeded in any given year. Also referred to as the “base flood.”

100-Year Flood Elevation. The elevation that the 100-year flood is expected to reach. Also referred to as the “base flood elevation.”

Open Record Predecision Hearing. An open record hearing as defined by 197-11-775 WAC, which is held before the Planning Commission or Hearing Examiner prior to the closed record approval hearing before the City Council.

Ordinary high water mark. That mark which is found by examining the bed and banks of a water body and ascertaining where the presence and action of waters are so common and usual, and so long continued in all ordinary years that the soils and vegetation have a character distinct from that of the abutting upland area. Where the ordinary high water mark cannot be found, it shall be the line of mean high water in areas adjoining fresh water. [WAC 173-22-030(11)]

Ordinary Repair and Maintenance. The work for which a permit issued by the City of Vancouver is not required by law, and where the purpose and effect of such work is to correct any deterioration or decay of or damage to the real property or structure appurtenance therein and to restore the same, as nearly as may be practicable, to the condition prior to the occurrence of such deterioration, decay or damage.

Original Parcel. A lot, parcel or tract created in compliance with all regulations in effect at the time it was initially conveyed, that constitutes the basis for considering the appropriate provisions of this title for platting or short platting; provided, that any lot, parcel or tract conveyed in its present configuration prior to December 18, 1978 (the passage of the short plat ordinance, M-1930) which complies with current zoning requirements, shall be conclusively presumed to have been lawfully created.

Overlay Area. A special geographic area designated in a capital facilities plan to be served by a system improvement, which area is not generally contiguous with an established service area. An overlay area may be local (i.e., covering only a portion of a single service area), regional (i.e., covering portions or all of several service areas), or county wide (i.e., covering both incorporated and unincorporated areas).

Overlay Zone or District. A designated area within a base zoning district for which specific land use regulations apply, in addition to the base zoning requirements.

Owner. The owner of record of real property as shown on the tax rolls of the County, or a person purchasing a piece of property under contract. For the purpose of this title, in terms of violations and binding agreements between the city and the owner, the owner shall also mean a leaseholder, tenant, or other person in possession or control of the premises or property at the time of agreement, violation of agreement, or the provisions of this title.

Ownership Interest. A property interest in an existing single-family residence under a recorded deed or under a contract of purchase, recorded mortgage, recorded deed of trust or recorded lease by which the applicant is responsible under penalty of forfeiture, foreclosure or default for payment of real property taxes and/or local improvement district assessments. The term shall also include a share ownership in a cooperative housing association, corporation or partnership if the applicant can establish that his or her share represents the specific unit or portion of such structure in which he or she resides.

Painted Wall or Wall Graphic. An advertisement painted directly on the wall of a building.

Parent Parcel. A parent parcel is a larger, original parcel from individual unit lots (or subdivided lots) are created.

Parking Area, Public. An open area other than a street or other public way, used for the parking of automobiles and available to the public whether for a fee, free of charge or as an accommodation for clients or customers.

Parking Space. A permanently surfaced and marked area not less than that specified in Chapter 20.450.045 VMC, Parking and Loading Revised, excluding paved area necessary for access, for the parking of a motor vehicle.

Parking Storage. A location where vehicles are placed or left for maintenance, repair, sale, rental or future use.

Partition. See subdivision.

Party of Record. A person or group who makes an appearance in a proceeding through the submission of either written or verbal evidence. Groups shall designate one person as a representative or contact.

Pedestrian Area. Any sidewalk, walking trail, courtyard, plaza or other area intended primarily for use by pedestrians.

Perimeter. The boundaries or borders of a lot, tract or parcel of land.

Permanent Supportive Housing (PSH). PSH is defined as subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the resident's health status, and connect the resident of the housing with community-based health care, treatment, or employment services. Permanent supportive housing is subject to all of the rights and responsibilities defined in chapter 59.18 RCW.

Permitted Use. Those uses allowed as a matter of right within certain zoning districts provided that such use is in accordance with requirements of the particular district and general conditions stated elsewhere in this title.

Permittee. The person who is proposing to use or who is using the land pursuant to any permit required herein.

Person. Any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, governmental entity, or any other legal entity; or their legal representatives, agents, or assigns. This definition includes all federal, state or local governmental entities.

Pervious Surface. Pervious surface is a surface material that allows stormwater to infiltrate into the ground. Examples include groundcover, shrubs or trees, grasses, and permeable pavements.

Petroleum. Crude oil, gases (including natural gas), natural gasoline, and other related hydrocarbons, oil shale, and the products of any of such resources.

Petroleum/Oil Refinery. An industry engaged in refining crude petroleum/oil into refined petroleum/oil. Petroleum/oil refining involves one or more of the following activities: 1) fractionation; 2) straight distillation of crude oil; and 3) cracking.

Planned Action Ordinance. The applicable city ordinance establishing the geographic boundaries, impact thresholds, and mitigation measures for the particular planned action subarea in which a planned action project is located.

Planned Action Project or Development Application. A project or application for a project which meets the criteria for designation as a planned action under the provisions of Section 43.21.031 RCW, Section 197-11-164 WAC, Section 20.740.630, and the particular planned action ordinance for the planned action subarea in which the project is located.

Planned Action Subarea. A specific geographic area, less extensive than the city's jurisdictional boundaries, for which a subarea plan under Chapter 36.70A RCW and an EIS under Chapter 43.21C RCW have been prepared and adopted to provide for prospective environmental review and comprehensive planning for future development.

Planning Commission. The Planning Commission of the City of Vancouver, Washington.

Planning Official. The city official within the community development department charged with administratively approving land use permits or her/his designate.

Planting strip. The area from the back of curb and the front of sidewalk or the area in the raised median used for grass or approved landscaping plants.

Plat. A final map, diagram or written document containing all the descriptions, specifications, and provisions concerning a subdivision of land.

Plat, Final. The final drawing of the subdivision or short subdivision and dedication prepared for filing for record with the Clark County Auditor and containing all elements and requirements set forth in this title and in state law.

Plat, Preliminary. An orderly and approximate drawing to scale of either a proposed subdivision or short subdivision showing the general layout of streets and alleys, lots and blocks, and other required submittals which shall furnish a basis for the approval or disapproval.

Poultry. Domesticated fowl such as chickens, ducks, geese and similar, and all game birds which are legally held in captivity.

Predetermination, Archaeological. A procedure by which an archaeologist makes a determination of the probable existence (presence or absence) of an archaeological site in a disturbance area and a recommendation to proceed or not to proceed with an archaeological resource survey in compliance with the provisions of this chapter.

Predominant. Regarding Infill Development, the most frequently occurring residential design characteristic along both sides of the road frontage from intersection to intersection (or block face).

Predictive Model. The classification of property according to the probability of its having archaeological resources. The probability levels are low, low-moderate, moderate, moderate-high, and high, which are based on a combination of information from inventories and predictive models provided by DAHP, other agencies, tribal governments and local permit review. The probability levels within the urban growth boundary of the city are generally shown on maps provided by Clark County Geographic Information Systems.

Premises. A lot or number of lots on which is situated a building or group of buildings designed as a unit, or on which a building or group of buildings are to be constructed.

Preserved. Leaving in the present condition.

Primary. The largest or most substantial use or element on the property, as in “primary” activity, residence, entrance, etc. All other similar elements are secondary in size or importance.

Primary Street. A public right-of-way intended by the city for general traffic circulation and the main means of access to abutting lots which is identified as any street within the transportation element of the current comprehensive plan as an existing or planned Enhanced Transit Corridor (HCT) or as part of the Primary Pedestrian Network or the Primary Bicycle and Small Mobility Network. Primary streets also include any public right-of-way abutting a public open space, park, greenway, natural area, or otherwise as identified by the City's current comprehensive plan.

Principal Unit. An existing or new single-family housing unit, duplex, triplex, rowhome/townhome, or other housing unit.

Priority Habitats and Species. Priority Habitats and Species are important fish and wildlife species and habitats as determined by the Washington State Department of Fish and Wildlife. Priority Habitats include habitats of state and federal listed species as well as other important species.

Private Open Space. The space included within a development for recreational use.

Process Type. Refers to the process by which a land use decision is rendered.

Process Type, Legislative. A legislative action or decision is the making of law, as opposed to the application of existing law to a particular use, such as the adoption of or amendment to a comprehensive plan or development regulation.

Process Type, Quasi-Judicial. Refers to an action or decision that requires substantial discretion or judgment in applying the standards or criteria of this title, and usually involves a public hearing.

Prohibited Use. A use that is not permitted in a base zoning or overlay district. Any use that is not specifically enumerated in this title as a permitted or conditional use or has not been determined by the Planning Official to be a legal nonconforming use.

Project Area. The portion of a site where development activity will take place.

Project Improvements. Project improvements shall mean site improvements and facilities that are planned and designed to provide service for a particular development project and that are necessary for the use and convenience of the occupants or users of the project, and are not system improvements. No improvement or facility included in the capital facilities plan shall be considered a project improvement.

Project Permit. Any land use or environmental permit or approval for a proposed action which is subject to the procedural provisions of Chapter 20.210 VMC.

Protected Area. All land where no construction activity, tree removal, vegetation removal or soil compaction is allowed and includes the critical root zone of those trees to be preserved.

Public Facilities. Regarding the Public Facilities Master Plan Ordinance:

1. Governmental facilities such as civic centers; libraries; auditoriums; police, fire and other public safety facilities; public streets; parks, open space and recreational facilities; and water, sewer; and storm water treatment facilities;
2. Public transit facilities including airports, train stations and transit centers;

3. Publicly and privately-owned medical centers;
4. Public and private elementary, middle and high schools;
5. Public and private colleges and universities; and
6. Religious institutions.

Public Improvement Plans. The technical drawings of the design and proposed construction of such items as streets, water and sewer systems, drainage and erosion control systems, meeting the requirements established by the City of Vancouver, Washington.

Public Place of Amusement, Public Amusement/Entertainment, and Public Entertainment. An amusement, diversion, entertainment, show, performance, exhibition, display or like activity, for the use or benefit of a member or members of the public, or advertised for the use or benefit of a member or members of the public, held, conducted, operated or maintained for a profit, either direct or indirect.

Public Plaza: Refers to a plaza of at least 200 square feet that is publicly accessible during business or operating hours.

20.150.040E Meanings of Specific Words and Terms Q through T.

Qualified Professional. A person with experience and training in the pertinent scientific discipline, and who is a qualified scientific expert with expertise appropriate for the relevant critical area subject in accordance with WAC 365-195-905(4).

A. *Urban Forestry.* Qualified professionals in urban forestry must have academic and field experience that makes them competent in urban forestry. This may include arborists certified by the International Society of Arboriculture or foresters certified by the Society of American Foresters. Qualified professionals in urban forestry must possess the ability to evaluate the health and hazard potential of existing trees, and the ability to prescribe appropriate measures necessary for the preservation of trees during land development.

B. *Critical Areas.* Qualified professionals in critical areas must have obtained a BS or BA or equivalent degree in biology, engineering, environmental studies, fisheries, geomorphology or a related field, and two years of related work experience. In addition:

   1. A qualified professional for frequently flooded areas or a geologic hazard must be a registered professional engineer, geologist, engineering geologist or hydrogeologist licensed in the State of Washington with experience in the analyses required for the relevant hazard(s). For frequently flooded areas, a qualified professional may also be an architect where provided by state or federal law.

2. A qualified professional for wetlands must have a minimum of five years of experience in wetland science including experience preparing wetland reports for review by regulatory agencies.
3. A qualified professional for fish and wildlife habitat conservation areas must be a qualified ecologist; biologist; or person with an environmental science degree, professional experience, certification, and/or licensure related to the relevant type of habitat in question.
4. A qualified professional for geologic hazard areas must be a Washington-licensed geologist or engineering geologist or a Washington-registered professional geotechnical engineer.

Reasonably Funded. A mitigation measure or other transportation system improvement scheduled for completion and designated as funded upon adoption of the most recent version of the Six-Year Street Plan.

Reasonably Safe from Flooding. Development that is designed and built to be safe from flooding based on consideration of current flood elevation studies, historical data, high water marks and other reliable data known to the community. In unnumbered A zones where flood elevation information is not available and cannot be obtained by practicable means, “reasonably safe from flooding” means that the lowest floor is at least two feet above the highest adjacent grade.

Recreational Vehicle. A vehicle which is built on a single chassis, 400 square feet or less when measured at the largest horizontal projection, designed to be self-propelled or permanently towable by a light-duty truck, and designed primarily not for use as a permanent dwelling, but as temporary living quarters for recreational, camping, travel, or seasonal use.

Redevelopment. This occurs when an existing building is completely demolished, and a new development is built on the same site.

Regional Industry. An industrial or commercial land use which provides significant community-wide or regional economic benefit through the creation of new economic growth and employment opportunity.

Regional Public Facility. A land use which is designed to serve the needs of the community or region affected by the impact(s) of development. Regional Public Facilities include: airports, colleges, hospitals, regional parks or community centers.

Regulatory Flood. The flood used to define the outer boundary lines of the Flood Fringe. The 100-year flood will be the regulatory flood for the purposes of regulations contained in this title, but a lesser or greater flood limit may be set in any ordinance applying FF (Flood Fringe) or FW (Floodway) zoning to any land. The regulatory flood shall be based upon Flood Insurance Rate Maps (FIRMs) provided by the Federal Insurance Administration (FIA).

Religious organization. The federally protected practice of a recognized religious assembly, school, or institution that owns or controls real property.

Remodel. An internal or external modification to an existing building or structure that does not increase the site coverage.

Remove or Removal. The act of removing a tree by digging up, cutting down or any act which causes a tree to die, significantly impacts its natural growing condition and/or results in diminished environmental benefits or a hazard tree: including but not limited to, damage inflicted on the root system by machinery, storage of material or soil compaction, changing the ground level in the area of the tree's root system, damage inflicted on the tree permitting infections or infestation, excessive pruning, paving with concrete, asphalt or other impervious material within the drip-line or any other action deemed harmful to the tree.

Residential Care Center. Any state or federally approved facility, other than a clinic, used as a residence for the care or rehabilitation of dependent children, the elderly, and the physically and/or mentally disabled. Residential care centers shall provide care to seven or more residents.

Residential Care Home. Any state or federally approved dwelling used as a residence for the care or rehabilitation of dependent children, the elderly, and/or persons with disabilities. Residential care homes shall provide care for eight or fewer residents.

Restoration. Measures taken to restore an altered or damaged natural feature including:

1. Active steps taken to restore damaged critical areas or their buffers to the functioning condition that existed prior to an unauthorized alteration; and
2. Actions performed to reestablish structural and functional characteristics of the critical area that have been lost by alteration, past management activities, or catastrophic events. See also wetland creation, re-establishment, and rehabilitation.

Right-of-Way, Public. The property held by the city or other governmental jurisdiction for existing and/or future public access including land occupied or intended to be occupied by a street, crosswalk, pedestrian and bike paths, railroad, road, electric transmission line, oil or gas pipeline, water main, sanitary or storm sewer main, street trees or other special use. The usage of the term right-of-way for land division purposes shall mean that every right-of-way hereafter established and shown on a plat or map is to be separate and distinct from the lots or parcels adjoining such right-of-way and not included within the dimensions or areas of such lots or parcels.

Riparian area. The area adjacent to aquatic systems with flowing water (e.g., rivers, perennial or intermittent streams, seeps, springs) that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other. Riparian areas are defined differently in and for the purposes of the Vancouver Shoreline Management Master Program.

Riparian Management Area and Riparian Buffer. The regulated areas that include the land from the ordinary high water mark to a specified distance as measured horizontally in each direction. The Riparian Management Area is adjacent to the lake, stream or river, and the Riparian Buffer is adjacent to the Riparian Management Area. See Figure 20.720-1 at Section 20.720.110(A) VMC or Figure 20.170.030-6 at Section 20.170.030(I) VMC.

Road. Means the same as street.

Roof. The exterior surface and its supporting structure on the top of a building.

Roof Line. The uppermost line of the roof of a building or, in the case of an extended facade, the uppermost height of said facade.

Runway. A defined area at an airport designed and constructed to accommodate the landing and takeoff of aircraft along its length.

Satellite Earth Station. The facilities used for reception and processing of programming services from a satellite prior to transfer to terrestrial distribution systems or for processing of programming and services from a terrestrial source before transmission via satellite.

School. An institution primarily engaged in academic instruction for all or part of the K through 12 educational program, public, parochial or private, and recognized or approved as such by the state. A school may also include the following uses: common accessory uses such as associated meeting rooms, auditoriums, athletic facilities and support facilities related to school district operations (e.g., offices, kitchens, counseling centers, head start, childcare, adult education, and family support centers) except for transportation, warehouse/storage, and maintenance facilities.

School, Pre. An institution primarily in child training and academic instruction prior to the mandatory first grade.

School, Specialized Instructional. An institution providing instruction and training in a specific service, art, dance, driving, and music. Includes vocation or trade such as business, real estate, travel, auto machinery repair, welding, and skill center.

Search Ring. Regarding wireless communications facilities, a geographic area identified by the communications service provider as necessary within which to locate a wireless facility or to enhance or expand its service.

Secure Community Transition Facility. A residential facility for persons civilly committed and conditionally released from a total confinement facility, operated by the Secretary of Washington Social and Health Services or under contract with the secretary pursuant to RCW 71.09.020(10) as described in RCW 71.09.250 or as amended.

Senior Housing. Housing limited to persons aged 55 years or older.

Sensitive Areas. For the purposes of Chapter 20.450.035 Landscaping and Tree Conservation, this includes streams, geologically hazardous areas, fish and wildlife habitat areas, wetlands, and their associated buffers.

Sensitive Resources. Any of the following types of sensitive areas and resources or cultural resources, when properly identified, designated or recorded as such by the applicable local, state or federal regulations:

1. Known archaeological and historical sites (to be recorded with the state);
2. Fish and Wildlife Habitat Conservation Areas (as identified in Section 20.720.110 VMC);
3. Frequently Flooded Areas (as identified in Section 20.720.120 VMC);
4. Geological Hazard Areas (as identified in Section 20.720.130 VMC);
5. Wetlands (as identified in Section 20.720.140 VMC); and
6. Tree tracts, set aside for the preservation of tree groves, as defined in Section 20.450.035 VMC and approved by the city's Urban Forester; and
7. Riparian areas, as identified in the Vancouver Shoreline Management Master Program.
8. Natural soils and native vegetation preserved as part of a low impact development.

SEPA Rules. Chapter 197-11 WAC, as adopted, revised, and amended by Ecology.

Service Area. A geographic area described in the city capital facilities plan in which a defined set of public facilities provides service to development within the area, provided, that the service area for schools shall be the applicable school district. Service areas may be separately described for each type of public facility.

Setback. The minimum allowable horizontal distance from a given point or line of reference, such as a property line, to the nearest vertical wall or other element of a building or structure or edge of vehicle parking area as defined herein. Where a sidewalk or private roadway is placed in an easement, the setback shall be measured from the back of sidewalk or edge of easement if there is no sidewalk.

Sexually-Oriented Adult Arcade and Sexually Oriented Adult Arcade Premises. Any premises on which any sexually-oriented adult arcade device is located and to which patrons, customers, and/or members of the public are admitted.

Sexually-Oriented Adult Arcade Device. Also known as panorama, preview, picture arcade, or peep show, any device which, for payment of a fee, membership fee or other charge, is used to exhibit or display a picture, view, film, videotape or videodisc, live show or other graphic display of specified anatomical areas. All such devices are denominated under this ordinance by the term sexually-oriented adult arcade device.

Sexually-Oriented Adult Entertainment. Any entertainment conducted in a public place of amusement where such entertainment involves a person appearing or performing in a state of nudity, as defined herein.

Sexually-Oriented Adult Entertainment Premises. Any premises to which the public, patrons or members are invited or admitted and wherein an entertainer provides sexually-oriented adult entertainment on a regular basis and as a substantial part of the business operation.

Shared, Courtyard. Shared Courtyard refers to a common open space designed to be shared by multiple dwelling units, where the units are arranged in such a way that creates a private courtyard with an entrance from the sidewalk.

Shared, Pedestrian Entrance. Shared Pedestrian Entrance refers to a single-entry point that provides access to two or more individual dwelling units within a main building that is only accessible by pedestrians, connecting directly to the public realm.

Shorelines of the State. Shorelines as defined in the Shoreline Management Master Program.

Short Plat. A map or representation of a short subdivision.

Short-Term Rental. A dwelling unit or individual rooms within a dwelling unit that are rented to a guest(s) by a short-term rental operator for fewer than 30 consecutive nights. A short-term rental is not considered a hotel, motel or bed and breakfast.

Short-Term Rental Operator. Any person who receives payment for owning or operating a dwelling unit, or portion thereof, as a short-term rental unit.

Side Street. Side Street refers to one or more public rights-of-way intended by the city for general traffic circulation and a means of access to abutting lots that is not defined as a primary street per this code.

Sidewalk. A facility made of concrete or other approved material for the conveyance of pedestrians usually adjacent to a street or between streets.

Sign. Any structure, device, advertisement, advertising device or visual representation intended to advertise, identify or communicate information to attract the attention of the public for any reason.

Sign Area. Means the entire area of a sign on which graphics, letters, figures, symbols, trademarks and/or text is to be placed, excluding sign structure, architectural embellishments and framework. Sign area is calculated by measuring the perimeter enclosing the extreme limits of the module or sign face containing the graphics, letters, figures, symbols, trademarks, and/or text; provided, however, the area of any sign using individual letters, numbers or symbols with a canopy, awning or wall as the background, without added decoration or change in the canopy, awning or wall, shall be the area within the shortest line drawn to include all letters, design and tubing which are a part of the sign or structure. For illuminated awnings the area shall be limited to the area within the shortest line drawn to include all copy and graphics, excluding illuminated areas outside of these lines.

Sign, Awning. A sign attached to or incorporated into an awning.

Sign, Billboard. An outdoor advertising structure, 12 foot by 25 foot or larger, designed and constructed to carry posters.

Sign, Business Complex. A sign which is typically free-standing and is designed to identify multiple businesses in a business complex.

Sign, Canopy. A sign attached to or incorporated into a canopy.

Sign, Commercial. Any sign that advertises a product, service, entertainment or commodity sold or offered on the premises where it is located.

Sign, Complex. (Auto Dealership Plan District). A sign with the purpose of identifying the area and/or containing more than one manufacturers brand.

Sign, Construction. A temporary sign giving the name or names of principal contractors, architects, lending institutions, or other persons or firms responsible for construction on the site where the sign is located, together with other related information.

Sign, Directional. A sign designed and erected solely for the purpose of traffic or pedestrian direction, and which is placed on the property to which or on which the public is directed.

Sign, Electronic Message Center (EMC). Electronic message center (EMC) means an electrically activated sign whose message content, either in whole or in part, may be changed by means of electronic programming.

Sign, Elevation. Regarding sign regulations, the portion of any building exterior enclosing the applicant's place of business, measured horizontally by width of occupancy and vertically by height of occupancy on the street building frontage. In the case of a single-story building, vertical height of occupancy is measured to the eave or parapet line. For partial occupancy in a multi-story building, vertical height of occupancy is measured from floor line to floor line.

Sign Face. Means the portion of the sign on which the graphics, letters, figures, symbols, trademark or text is placed.

Sign, Fascia. A flat sign which projects less than one foot from the face or wall of the building, including parapet, upon which it is affixed, painted or attached, running parallel for its whole length to the face or wall of the building, and which does not extend beyond the horizontal width of such building.

Sign, Flashing. Any sign which contains an intermittent or flashing light source or which includes the illusion of intermittent or flashing light by means of animation or an externally-mounted intermittent light source. Time and temperature signs are excluded from this definition. For the purpose of this Title, EMC's (consistent with the standards of Section 20.450.050 VMC) shall not be considered flashing signs.

Sign, Franchise. (Auto Dealership Plan District). A sign that identifies the manufacturers brand and/or name.

Sign, Free Standing. (Pole Signs and Monument Signs). A sign that is not attached to a building and is erected on a frame connected to the ground. Pole signs and monument signs are specific types of freestanding signs. A freestanding sign does not include a portable sign.

Sign Height. The vertical distance measured from grade at the point of support to the top of the sign or the sign's structure.

Sign Maintenance. The repair or refurbishment of a sign, sign structure or any part of each.

Sign, Marquee. A sign attached to or incorporated into a marquee.

Sign, Messages Without a Cabinet, Area of. The area of any single geometric shape which encompasses all lettering and/or graphic message.

Sign, Monument. Means a sign and supporting structure which is attached to the ground and has similar top and bottom dimensions and is constructed as a solid structure or one which gives the appearance of a continuous and unbroken mass, with no separations between the sign and the base.

Sign, Multi-faced. A sign with more than one face. These types of signs shall be considered one (1) sign for the purpose of determining the number of signs allowed.

Sign, NIT. A measurement of brightness used to rate luminous displays. NIT is expressed in "candelas per square meter".

Sign, Official. Means the same as Public-Sector Sign.

Sign, Off-Premises. A third-party sign that advertises goods, products, services or facilities or directs persons to a location different from where the sign is installed.

Sign, On-Premises. A sign which carries only advertisement strictly incidental to a lawful use of the premises on which it is located, including signs or sign devices indicating the business transacted, services rendered, goods sold or produced on the premises, name of the business, and name of the person, firm or corporation occupying the premises.

Sign, Pole. A sign that is supported permanently upon the ground by poles or braces and not attached to any building.

Sign, Political Campaign. Any temporary sign which displays the name and/or picture of an individual seeking election or appointment to a public office or which pertains to a forthcoming public election or referendum or which advocates political views or policies.

Sign, Portable – Permanent. Permanent portable signs shall be defined as “onsite” signs placed in the right-of-way along the business frontage and on the same side of the street of the building or establishment which it advertises. Permanent portable signs shall be meant for continuous display during the hours the business is open and shall have the primary purpose of identifying the business.

Sign, Portable – Temporary. Temporary portable signs shall be defined as “off-site” signs placed in the right-of-way advertising an approved business or use. Temporary portable signs shall be displayed during the hours the business is open and shall have the sole purpose of identifying the business or providing directions.

Sign, Private Non-Commercial. Any sign under 6 square feet that does not advertise a product, service, entertainment, or commodity sold or offered on the premises where it is located.

Sign, Projecting. Shall mean any sign other than a wall sign, which is attached to or projects 12 inches or more from a structure or building face or wall.

Sign, Public-Sector. Any sign erected by any federal, state, county or city governmental agency or at the direction of any such governmental agency or court.

Sign, Public Service Information. A sign that provides general public service information to the public such as time, date, temperature, weather or directional information.

Sign, Reader Board. A sign constructed for the placing of advertising messages, which messages are changeable by use of manually removable or electrically changeable letters.

Sign, Rooftop. A sign erected upon the roof of a building, the entire face of which is situated above the roof line of the building to which it is attached, and which is wholly or partially supported by said building.

Sign, Rotating. A sign, any portion of which moves or is movable by any mechanical manner.

Sign, Secondary. A second free-standing sign on a given frontage in excess of 300 linear feet.

Sign, Sidewalk. A portable sign, typically in the shape of an inverted V, with two sign boards attached to each other at the top of the sign; also known as a sandwich board or A-frame sign. Each board shall be considered a separate sign face for purposes of determining allowable area of sign.

Sign, Temporary. Any sign that is not permanently installed or affixed to any sign structure or building, and not displayed for longer than 30 consecutive calendar days. In the case of construction project signs, they may be maintained for the duration of construction.

Sign, Time and Temperature. Means the same as Public Service Information Sign.

Sign, Vehicle. Any sign attached to or placed on a parked vehicle or trailer used principally for advertising purposes, rather than transportation, but excluding signs relating to the sale, lease, or rental of the vehicle or trailer and excluding signs which identify a firm or its product on a vehicle operated during the normal course of business.

Sign, Video. A sign providing information in both a horizontal and vertical format (as opposed to linear), through use of pixel and sub-pixel technology having the capacity to create continuously changing sign copy in a full spectrum of colors and light intensities.

Sign, Wall. Means the same as Painted Wall or Wall Graphic.

Sign, Window. Any sign affixed to (or painted on) the inside or outside of a window and intended to be viewed from the exterior of the structure.

Single Impact. An individual incidence of noise, actually measured in decibels, which may be heard on a property and which may be greater or lesser than the Ldn value, which is derived from the logarithmic averaging of single impacts within a period of time.

Significance. A quality of a property which helps one understand the history of the local area, state or nation by illuminating the local, statewide or nationwide impact of the events or persons associated with the property or its architectural type or style in information potential. The local area may be as large as Clark County or Southwest Washington or as small as a neighborhood. Local significance may apply to a property that illustrates a theme that is important to one or more localities; state significance to a theme important to the history of the state; and national significance to property of exceptional value in representing or illustrating an important theme in the history of the nation.

Single Room Occupancy (SRO). Occupancy by a single individual of a unit that contains no sanitary facilities or food preparation facilities or contains either but not both types of facilities.

Site. Any plot or parcel of land or combination of contiguous lots or parcels of land.

Six-Year Street Plan. That portion of the city's Capital Facilities Plan which inventories planned street and road construction and improvement, and which designates such construction projects and improvements as funded or nonfunded.

Slope. The deviation of a surface from horizontal, usually expressed in percent or degrees.

SMA. The State Shoreline Management Act of 1971, as amended.

Soft Armoring Techniques. Techniques that apply the principles of the biological, ecological, and soils sciences and structural engineering to build structures which, using live plant materials as a main structural component, stabilize the soil against erosion, sedimentation, and flooding. Also referred to as "bioengineering techniques."

Sound Transmission Reduction. Reduction of sound or noise from unit to unit utilizing the standards of the City Adopted Building Code(s).

Special Provisions. Street construction requirements peculiar to a special project that are not otherwise thoroughly or satisfactorily detailed and set forth in the standard specifications or standard plans.

Special Valuation Tax Incentive Program. The local option program that makes available to property owners a special tax valuation for rehabilitation of historic register properties under which the assessed value of an eligible historic property is determined at a rate that excludes, for up to ten years, the actual cost of the rehabilitation.

Specified Anatomical Areas. Regarding Adult Businesses, less than completely and opaquely covered: human genitals, pubic region, buttock and female breast below a point immediately above the top of the areola; and human male genitals in a discernibly turgid state even if completely and opaquely covered.

Specified Sexual Activities. Regarding Adult Businesses, human genitals in a state of sexual stimulation or arousal; acts of human masturbation, sexual intercourse or sodomy; and fondling or other erotic touching of human genitals, pubic region, buttock or female breast.

Stacked Flats. Stacked Units refer to multiple dwelling units compiled vertically within a single main building.

Start of Construction. The start of permanent construction or substantial improvement activity on a site within 180 days of the issuance of a building permit. Permanent construction activities include the pouring of slab or footings, the installation of pilings, construction of columns or any work beyond site preparation, excavation, setting of temporary forms or the placement of accessory buildings; or the placement of a manufactured home on a foundation. For a substantial improvement, the actual start of construction means the first alteration of any wall, ceiling, floor, or other structural part of the building, whether or not that alteration affects the external dimensions of the building.

Stealth Design. A wireless communications facility's support structure, antennae or accessory equipment structure that is designed to blend in with the existing physical environment, and reduce visual impacts to the extent possible.

Storage, Open. Storage of property outside of a fully enclosed building.

Storage Space. Sufficient space, either in individual dwelling units or common storage rooms, to provide adequate, secure, and convenient storage for items owned by building tenants.

Stormwater. Stormwater is that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes and other features of a stormwater drainage system into a defined surface waterbody or a constructed infiltration facility.

Stormwater Conveyance. Parts of a stormwater facility (such as pipes, culverts, swales, etc.) that are constructed specifically to transport water from one point to another. See Stormwater Facility.

Stormwater Facility. A constructed component of a stormwater drainage system, designed or constructed to perform a particular function or multiple functions. Stormwater facilities include, but are not limited to, pipes, swales, ditches, culverts, street gutters, detention ponds, retention ponds, constructed wetlands, infiltration devices, catch basins, oil/water separators, biofiltration swales, bioretention, permeable pavement, and vegetated roofs.

Stormwater Manual. Stormwater Manual means the Stormwater Management Manual for Western Washington, which is the 5-volume technical manual prepared by the Washington State Department of Ecology Water Quality Program, December 2014, Publication No. 14-10-055 (a revision of Publication No. 12-10-030), 5 volumes, and as hereafter amended.

Stormwater Permit. Stormwater Permit means the City of Vancouver's National Pollutant Discharge Elimination System (NPDES) Western Washington Phase II Municipal Stormwater Permit issued August 1, 2013, which was modified, Effective January 16, 2014, by the Washington State Department of Ecology, and as hereafter amended or reissued.

Story. That portion of a building between the surface of any floor and the surface of the next floor above it; or, if there is no floor above it, the space between such floor and ceiling.

Story Height, Upper Floor. Story Height of the Upper Floors refers to the vertical clearance between floor levels (or floor-to-floor) in feet of the floors on the second or higher story of a main building.

Stream. Water contained within a channel, either perennial or intermittent, and classified according to WAC 222-16-030 or WAC 222-16-031. Streams also include natural watercourses modified by humans. Streams do not include drainage ditches which are not modifications of natural watercourses.

Street. A private or public way designed primarily for vehicular traffic. It includes the terms road, highway, avenue, boulevard, thoroughfare, or other traffic way, and usually includes improvements, including curbs, sidewalks, and street pavement within the right-of-way.

Street Frontage. The linear frontage of a parcel of property abutting a single public street.

Street Functional Classification System. The adopted hierarchy of street use as it relates to volume, speed, regional, area-wide, and local characteristics.

Street Network. A system of streets, alleys, and public spaces that connect to form the character of the area.

Street, Private. A thoroughfare that is privately owned providing a means of access to a property or properties.

Street, Public. A thoroughfare or right-of-way dedicated, deeded, condemned or otherwise acquired by the public for use as such, other than an alley, which affords the principal means of access to abutting property including avenue, place, way, drive, lane, boulevard, highway, road, and any other thoroughfare.

Structure. Anything constructed or built, any edifice, building of any kind or any piece of work artificially built-up or composed of parts joined together in some definite manner, which requires location on the ground or is attached to something having a location on the ground, including swimming pools, wading pools and covered patios, excepting outdoor areas such as paved areas, walks, tennis courts and similar recreation areas. For the purposes of Section 20.720.120 VMC, Frequently Flooded Areas, a structure is a walled and roofed building , or a gas or liquid storage tank that is principally above ground.

Subdivision. The division or re-division of land into ten or more lots for the purpose of sale, lease or transfer of ownership. The term subdivision also applies to an area or tract of land that has been subdivided.

Subdivision, Short/Unit Lot Subdivision. A short subdivision or unit lot subdivision is a land partition containing nine (9) or fewer lots.

Substantial Damage. Damage of any origin sustained by a structure whereby the cost of restoring the structure to its pre-damaged condition would equal or exceed 50% of the market value of the structure before the damage occurred.

Substantial Disturbance. Disturbance such that little or no useful archaeological data could be obtained.

Substantial Improvement. Any repair, reconstruction, or improvement of a structure, the cost of which equals or exceeds 50% of the market value of the structure either:

1. Before the improvement or repair is started; or
2. If the structure has been damaged and is being restored, before the damage occurred.

"Substantial improvement" is considered to occur at the start of construction. "Substantial improvement" does not include either:

1. Any project for improvement of a structure to correct existing violations of state or local health, sanitary or safety code specifications which have been identified by the local code enforcement official and which are the minimum necessary to assure safe living conditions; or
2. Any alteration of a structure listed on the National Register of Historic Places or a State Inventory of Historic Places.

Substantial Noise Impact. Exterior noise levels greater than Ldn 65, which impact necessitates special sound insulation to produce noise levels of 45 Ldn or less within the interior of a residential structure.

Survey, Archaeological. Regarding archaeological resource protection, a procedure by which an archaeologist makes a determination of the presence or absence of an archaeological site in a disturbance area, a preliminary assessment of the site's potential significance, and a recommendation for further evaluation, avoidance, mitigation or recovery of resources in compliance with the provisions of 20.710 VMC.

System Development Charge (SDC). The connection fee charged so that the property upon which it is imposed will pay its equitable share of the costs of water-sewer system facilities which are system-wide in nature and are not site-specific needs, including such property's equitable share of the amount required to upgrade such system to meet the demands imposed by the development.

System Improvements. Public facilities that are included in the capital facilities plan and are designed to provide service areas within the community at large, in contrast to project improvements.

Telecommuting. The use of telephones, computers or other similar technology to permit an affected employee to work at home or at a location closer to home than the affected employer's principal worksite.

Temporary. A period not to exceed one year except as otherwise provided in this title.

Tenant Improvements. Construction improvements typically made to the interior of a nonresidential building to fit the building to a particular tenant's needs, or to create separate tenant spaces. Typically it involves such things as adding or removing walls, ceilings and doors; re-wiring for electrical outlets and lighting; and providing plumbing, sprinklers, counters and walk-in coolers, often as part of a separate lease space in a building.

Through-Ventilation. The encouragement of natural cross-ventilation.

Total Developable Land (TDL). That portion of the subject property remaining once sensitive areas are subtracted from the total acreage of a property or collection of properties proposed for development.

Tract. A piece of land set aside in a separate area for dedication to the public, a homeowner's association, or other entity, (e.g., open space, recreational facilities, and tree preservation) wetland or other sensitive lands.

Traffic Study. A study of traffic behavior by a licensed engineer.

Transit. A multiple-occupant vehicle operated on a for-hire, shared-ride basis, including bus, ferry, rail, shared-ride taxi, shuttle bus or vanpool.

Transit Facility. A development provided by a public transportation provider, which is designed to aid or encourage community use or multi-modal public transportation system, such as bus and van/carpools.

Transit Stop, Major. A major transit stop means any station serving as a stop on an existing or planned high capacity transit system route, including fixed guideway and bus rapid transit systems.

Transitional Housing (TH). TH is defined as a project that provides housing and supportive services to homeless persons or families for up to two years and that has as its purpose facilitating the movement of homeless persons and families into independent living.

Transitional Surfaces. An area extending outward at 90 degree angles to an airport's runway centerline at a slope of seven feet horizontally for each foot vertically.

Transitional Zone. The areas beneath the transitional surfaces.

Transparency, Ground Floor. Refers to the percentage of the main building ground floor lineal feet that consists of transparent materials to add depth and visual interest at the pedestrian scale between 2 and 8 feet above grade.

Transparency. Transparency refers to the percentage of the main building façade that consists of transparent materials to add depth and visual interest at the pedestrian scale.

Transplant. The relocation of a tree from one place to another on the same property.

Tree. Any self-supporting perennial woody plant that matures at a height greater than 26 feet and is generally referred to in the nursery and landscape industry as a tree.

Tree Drip Line. A tree's drip line shall be described by a line projected to the ground from the outer edge of the tree canopy delineating the outermost extent of foliage in all directions.

Tree Farm. See Commercial Nursery.

Tree, Buffer. Trees required by the development code to be located along each property line to provide screening along adjacent properties.

Tree, Hazard. Any tree with a high or extreme overall risk rating within a five-year timeframe and the risk cannot be reduced as recommended by a qualified arborist.

Tree, Mitigation. A tree planted and retained to achieve the required tree density for a parcel or to replace a tree removed in violation of city ordinance.

Tree, Nuisance. A tree that is causing physical damage to property that cannon be corrected by reasonable practices, or has been damaged by past maintenance practices, or is causing a problem and the issues cannot be reasonably corrected.

Tree Preservation. The retention of a tree or trees during and after construction.

Tree, Street. A tree located within a street right-of-way or street tree easement, adjacent to public or private streets, including undeveloped areas.

Tree Tract. A separate deeded tract of land, specifically set aside for the preservation and/or planting of trees. Stormwater retention/detention facilities, sensitive areas, and other common areas may be considered tree tracts if they currently support the growth of trees.

Tree Unit. A unit of measurement based upon the size of the tree as set forth in Chapter 20.450.035 VMC, Landscaping and Tree Conservation.

Tree, Vegetation and Soil Plan. A plan that contains specific information pertaining to the protection of healthy soil, and the preservation, and planting of trees and native vegetation pursuant to Chapter 20.450.006 VMC, Landscaping and Tree Conservation.

Tree, Vegetation and Soil Protection Area (TVSPA). A separate tract of land, which may or may not be deeded as such, specifically set aside for the preservation of healthy soils and the preservation or planting of existing and/or native vegetation and trees. Stormwater retention/detention facilities, critical area buffers and other common areas may be considered TVSPA if they currently or are improved to an extent where they can support healthy soils and the growth of native vegetation and trees. The purpose of these areas for preserving healthy soils, preserving and/or planting native vegetation and trees is stated on the face of the plat when applicable.

Tribe or Tribes. Regarding Archaeological Preservation, any federally-recognized or other local Native American government organization which may consider the site to be of historic or cultural significance.

Truck, Heavy. Trucks, including truck tractors and similar vehicles, with two or more rear axles.

Truck, Light. Trucks and similar vehicles with single rear axles and single rear wheels.

Truck, Medium. Trucks and similar vehicles other than truck tractors with single rear axles and dual rear wheels. Truck tractors are in the Heavy Truck category.

20.150.040F Meanings of Specific Words and Terms U through Z.

Undevelopable Area. An area that cannot be used practicably for a habitable structure because of natural conditions, such as slopes exceeding 20%; severe topographic relief; water bodies; or conditions that isolate one portion of a property under another portion so that access is not practicable to the unbuildable portion. Undevelopable area also includes man-made conditions such as existing development restrictions that prohibit development of a given area of a lot by law or private agreement; or existence or absence of easements or access rights that prevent development of a given area.

Undeveloped. Regarding the Landscape and Tree Conservation Ordinance, a parcel of land on which no buildings or other facilities are located and which is to remain without improvements for a period of six years.

Uniform Plumbing Code. The current version of the Uniform Plumbing Code as adopted by the City of Vancouver at the time construction commences.

Unit Lot Subdivision. Process of dividing a single parent parcel into individual “unit lots” that may be sold to individual owners, typically used with middle housing.

Upper-Level Step Back. Step back of the upper stories refers to the horizontal setback in feet of upper story building facade from lower story building façade on a main building, designed to reduce the building’s mass vertically and allow more light and air to reach the ground and pedestrian levels.

Urban Forestry. The art and science of planning, managing, and protecting natural and planted vegetation in urban areas.

Urban Growth Boundary. The boundary of an urban growth area designated in the Clark County Comprehensive Land Use Plan.

Use, Primary Use Type. An activity or purpose for which land or premises or a building thereon is designed, arranged or intended, or for which it is occupied or maintained, let or leased. May have associated primary use standards.

Utility Facilities. All physical facilities necessary for the provision of the following services:

1. Sewer;
2. Water;
3. Electricity;
4. Natural gas;
5. Telephone;
6. Cable television;
7. Storm drainage; and
8. Transportation.

Utility Facilities, Essential. Those facilities which are necessary to support principal development and involve only minor structures such as:

1. Overhead lines and poles;
2. Underground lines and pipes;
3. Transformers and regulator stations; and
4. Private, on-site facilities such as septic tanks and wells.

Utility Facilities, Major. Those facilities which have a substantial public impact, including but not limited to:

1. Administrative offices and operation centers;
2. Sewage treatment plants and lagoons;
3. Electric generation facilities including biomass generating facilities; and
4. Essential public facilities as defined in Chapter 20.450.065 VMC, Essential Public Facilities.

Utility Facilities, Minor. Those facilities which have a local impact on surrounding properties and are necessary to provide essential services such as:

1. Transmission and distribution substations;
2. Pump stations;
3. Water towers and reservoirs;
4. Public wells;
5. Outfalls;
6. Telephone switching facilities;
7. Cable television receiver and transmission facilities, excluding wireless communications facilities as defined in Section 20.450.075 VMC, Wireless Communications Facilities Standards;
8. Catch basins, retention ponds and related facilities; and
9. Water treatment facilities.

Variance. An administrative or quasi-judicial decision to lessen or otherwise modify the requirements of the development code.

Vehicle, Accessory Recreational. A vehicle with or without motive power, which is designed for sport or recreational use or which is designed for human occupancy on an intermittent basis such as vacation trailers and fifth-wheel trailers. A camper is considered an accessory recreation vehicle when it is standing alone. A recreational vehicle also includes vehicles designed for off-road use:

1. Off-road vehicles;
2. Dune buggies; and
3. Recreational boats.

Vehicle, Commercial. Any vehicle the principal use of which is the transportation of commodities, merchandise, produce, freight, animals, or passengers for hire. (Per RCW 46.04.140)

Vehicle, Featured Display (Motor Vehicle Sales/Rental). Featured Vehicle Display is the "showcasing" of motor vehicles outdoors.

Vehicle, Motor. Vehicles that have their own motive power and are used for the transportation of people or goods on streets. Motor vehicle includes motorcycles, passenger vehicles, trucks, and recreational vehicles with motive power.

Vehicle, Passenger. A motor vehicle designed to carry ten persons or fewer including the driver. Passenger vehicle also includes motor vehicles designed to carry ten persons or fewer that are constructed on a truck chassis or with special features for occasional use. Passenger vehicles include cars, minivans, passenger vans, and jeeps. Passenger vehicle is intended to cover the vehicles identified as passenger cars and multi-purpose passenger vehicles by the National Highway Traffic Safety Administration in Title 49 of the Code of Federal Regulations, Chapter V, Section 571.3. See also Recreational Vehicle and Truck.

Vesting. A legal right of applicants to have their development application reviewed under the regulations in effect as of a certain date when the application has met certain timing and completeness requirements. For example, an application determined by the Review Authority to be fully complete is vested under the regulations in effect at the time of such determination, regardless of subsequent changes to development regulations.

Vesting, Contingent. A legal right of applicants to have their fully complete development application, when submitted within 180 days of the pre-application conference, reviewed under the development regulations, not including fees, in effect at the time of the pre-application conference.

Vision Clearance Triangle. An area, typically triangular in shape adjacent to a driveway or at a property corner where two streets (or an alley and street) intersect, that must be maintained clear of visual obstructions to provide visibility to motorists and pedestrians.

Visual Obstruction. An obstruction of vision through landscaping, structure or device in those areas near intersections of roadways and motor vehicle access points where a clear field of vision is necessary for traffic safety.

Walkway. A facility for pedestrian use to or through a parcel for the general public which may or may not be adjacent to the street. Walkways may differ from sidewalks in standards, alignment, shape, location, construction materials, and overall installation.

Washington Heritage Register. The state listing of properties that are significant to the community, state or nation, but which do not meet the criteria of the National Register of Historic Places.

Wastewater Facility. In Chapter 14.12.020 VMC, Water and Sewer Facilities, the City of Vancouver's industrial wastewater collection system and industrial wastewater pretreatment facility constructed in 1979, and sometimes known as the pretreatment lagoon.

Water-dependent. A use or portion of a use that requires direct contact with the water and cannot exist at a nonwater location due to the intrinsic nature of its operations. Also see the Vancouver Shoreline Management Master Program.

Water-enjoyment. A use or activity which facilitates or provides public access to the shoreline, and through its location, design, and operation assures the public's ability to enjoy the physical and aesthetic qualities of the shoreline. A water-enjoyment use or activity must be open to the general public, and space within it must be devoted to fostering public enjoyment of the shoreline. Parks, piers, restaurants, trails, promenades, museums, aquariums, reserves, and resorts are examples of water-enjoyment uses and activities. Also see the Vancouver Shoreline Management Master Program.

Water-related. A use or activity which must be located close to the land/water interface to support a water-dependent use or activity either by its own operation or by the provision of the services it houses. The economic viability of a water-related use or activity is dependent on a location near the waterfront. Warehousing of goods transported by water, seafood processing plants, hydroelectric generating plants, and log storage are examples of water-related uses or activities. Also see the Vancouver Shoreline Management Master Program.

Watershed. A topographically delineated area draining to a single surface water system as identified and mapped by Clark County Public Works.

Weekday. Any day of the week except Saturday, Sunday, and legal holidays.

Wetland. An area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas. Wetlands do not include those artificial wetlands intentionally created (but not as mitigation for impacts to wetlands) from nonwetland sites, including, but not limited to irrigation and drainage ditches, grass-lined swales, canals, detention facilities, wastewater treatment facilities, farm ponds, and landscape amenities or those wetlands created after July 1990 that were unintentionally created as a result of the construction of a road, street or highway. Wetlands shall include those artificial wetlands intentionally created from nonwetland areas to mitigate conversion of wetlands.

Wetland Buffer. An area that surrounds and protects a wetland from adverse impacts to the functions and values of a regulated wetland.

Wetland Creation. The manipulation of the physical, chemical or biological characteristics present to develop a wetland on an upland or deepwater site where a biological wetland did not previously exist. Activities typically involve excavation of upland soils to elevations that will produce a wetland hydroperiod, hydric soils, and support the growth of hydrophytic plant species. Creation results in a gain in wetland acres and functions.

Wetland Enhancement. The manipulation of the physical, chemical or biological characteristics of a biological wetland to increase or improve specific functions or to change the growth stage or composition of the vegetation present. Enhancement is undertaken for specified purposes such as water quality improvement, flood water retention or wildlife habitat. Activities typically consist of planting vegetation, controlling nonnative or invasive species, modifying site elevations to result in open water ponds or some combination of these. Enhancement results in a change in certain wetland functions and can lead to a decline in other wetland functions. It does not result in a gain in wetland acres.

Wetland Re-establishment. The manipulation of the physical, chemical or biological characteristics of a site with the goal of returning natural or historic functions to a former wetland. Activities could include removing fill material, plugging ditches or breaking drain tiles. Re-establishment results in a gain in wetland acres and functions.

Wetland Rehabilitation. The manipulation of the physical, chemical or biological characteristics of a site with the goal of repairing natural or historic functions, and processes of a degraded wetland. Activities could involve breaching a dike to reconnect wetlands to a floodplain, restoring tidal influence to a wetland or breaking drain tiles and plugging drainage ditches. Rehabilitation results in a gain in wetland functions but not in wetland acres.

Wetland, Scrub-shrub. A wetland with at least 30 percent of its surface area covered by woody vegetation less than 20 feet in height as the uppermost strata.

Wetlands Delineation Manual. Approved federal wetland delineation manual and applicable regional supplements.

Wind-firm. A tree which has a high probability of withstanding windstorms.

Wireless Communications Facilities. The site, wireless communications support structures, antennae, accessory equipment structures, and appurtenances used to transmit, receive, distribute, provide or offer wireless telecommunications services. Wireless communications facilities include, but are not limited to, antennae, poles, towers, cables, wires, conduits, ducts, pedestals, vaults, buildings, electronic, and switching equipment.

Wireless Communications Support Structures. A structure erected to support wireless communications antennas and connecting appurtenances. Wireless communications support structures may include, but are not limited to lattice tower, monopoles, and guyed towers.

Wireless Communications Systems. The sending and receiving of radio frequency transmissions and the connection and/or relaying of these signals to land lines and other sending and receiving stations (cell sites), and including, but not limited to cellular radiotelephone, personal communications services (PCS), enhanced/specialized mobile radio (ESMR), commercial paging services, and any other technology which provides similar services.

Writing, Written or In Writing. These terms refer to original signed and dated documents. Facsimile (fax) transmissions are a temporary notice of action that must be followed via mail or delivery of the original and dated document.

Yard. Any open space on the same lot with a building or a dwelling group, which open space is unoccupied and unobstructed by any structure from the ground upward to the sky. Required setback areas shall be considered yards as defined herein.

Yard, Front. An open space defined by setbacks extending the full width of the lot between a setback line and the front lot line, unoccupied, and unobstructed from the ground upward, except as specified elsewhere in this title.

Yard, Rear. An open space defined by setbacks extending the full width of the lot between a setback line and the rear lot line, unoccupied, and unobstructed from the ground upward, except as specified elsewhere in this title.

Yard, Side. An open space defined by setbacks extending from the front yard to the rear yard between a setback line and the nearest side lot line, unoccupied, and unobstructed from the ground upward, except as specified elsewhere in this title.

Yard, Street Side. On corner lots where two streets intersect, an open space defined by setbacks extending from the front lot line to the rear lot line, along the side of the lot which fronts on a street and between the setback line and side street lot line, unoccupied, and unobstructed from the ground upward, except as specified in this title.

Zero-Lot-Line. Zero-Lot-Line refers to primary and side street setbacks that require a main building to be placed directly on the property line.

Zoning District. A geographic area which corresponds to a comprehensive plan designation and which specifies allowed and conditionally allowed uses and applicable standards for development within the district. Also referred to as Zone or District or Base Zoning District.

THE VANCOUVER MUNICIPAL CODE IS CURRENT THROUGH UPDATE, PASSED UPDATE.

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CHAPTER 20.160
USE CLASSIFICATIONS

Sections:

20.160.010 Purpose.

20.160.020 Listing of Use Classifications.

20.160.030 Unlisted Use: Authorization of Similar Use.

20.160.010 Purpose.

Purpose. To classify uses into use types based on common functional, product or compatibility characteristics and provide a basis for regulating land uses directly relevant to the public interest.

20.160.020 Listing of Use Classifications.

A. *Residential use types.* Residential uses include facilities and spaces intended for long-term habitation by individuals or households and may include a range of housing types and densities, from single-family homes to multi-family developments intended to support a mix of lifestyles and household needs.

   1. *Group Living.* Living facilities for groups of individuals that include at least one person residing on the site who is responsible for supervising, managing, monitoring and/or providing care, training or treatment of residents. Larger group living facilities may also be characterized by shared facilities for eating, hygiene and/or recreation. Examples include nursing/convalescent homes, residential care homes or centers; sororities/fraternities and convents/monasteries. Tenancy is typically 30 days or more. Excludes detention and post-detention facilities as defined in this chapter of the code.

2. *Household Living.* Living facilities for small groups (households) of people who are related or unrelated. Tenancy is longer than 30 calendar days. Household structures include single-family detached and attached dwellings; duplexes; middle housing (3-6 plex, townhouse, rowhouse, stacked flats, cottages) multifamily dwellings; and manufactured/modular homes. (See Sections 20.450.080 and Section 20.450.085 for additional standards for cottage and manufactured/modular homes, respectively.) Most types of senior housing (e.g., congregate care or assisted living) are considered to be household living if residents live in self-contained units, even if there are also shared facilities within the building. Household living may also include permanent supportive housing, single-room occupancy (SROs) facilities and co-living housing. The maximum number of people who may reside in any given dwelling unit shall be determined by the city adopted building code.
3. *Short-Term Rental.* A dwelling unit or individual rooms within a dwelling unit that are rented to a guest(s) by a short-term rental operator for fewer than 30 consecutive nights.
4. *Temporary Shelter / Housing.* A structure or organization of structures that provide temporary housing, such as emergency housing. Accessory uses include any uses that may be necessary for the operations and maintenance of the shelter, including, but not limited to administrative offices, fixed generators, and storage containers.

B. *Civic / Institutional use types.* Civic / institutional uses include governmental, medical, educational, cultural, or religious functions. These uses are typically accessible to the public and contribute to the social and cultural infrastructure of the community.

1. *Ambulance services.* An ambulance service is a facility or designated location used for the dispatch and operation of ambulances.
2. *Community Centers.* Public and nonprofit social, resource and multi-purpose facilities that are open to the public for free or fee (including membership fees). They are designed to provide a space for various activities and services that benefit the local population and typically host events, classes, recreational activities, and programs that foster engagement, education, and social connection. They can be used for everything from cultural events and fitness classes to after-school programs and town meetings. Essentially, they're a hub for communal interaction and support. Examples include community centers and senior centers. Accessory uses may include offices, food preparation and service, outdoor spaces, meeting rooms, art exhibition areas, fitness amenities (gyms, or outdoors sports courts), child care supporting parents during events and programs, rental spaces (private events like weddings, birthdays or reunions), libraries and study areas, technology hubs, laundry facilities, showers, health assessments, classrooms and related activities.
3. *Cultural centers.* Public or nonprofit cultural facilities include libraries, museums, historic sites, performing art centers and galleries.

4. *Colleges.* Institutions of higher education. Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act. Uses often include a mixture of classrooms, laboratories, theaters, auditoriums, libraries, dormitories, eating facilities, bookstores, other small-scale retail and associated general offices. Excludes private, profit-making trade, and vocational schools (see Secondary Retail Uses: Personal Services in this section).
5. *Community Recreation.* Public, private, and nonprofit recreational, social and multi-purpose facilities that are open to the public for free or fee (including membership fees). Examples include health/fitness clubs; indoor or outdoor tennis/racquetball and soccer clubs and other sports field complexes, indoor/outdoor swimming pools, boat launches, golf courses and shooting ranges. Accessory uses may include clubhouses, pro shops, offices, locker rooms, restaurants/delis/concession stands, childcare facilities, restrooms, maintenance facilities, and parking. Excludes such facilities when collocated in a public park (see Park and Natural Area Uses in this section), and certain types of indoor recreational facilities (see Secondary Retail Uses: Indoor Entertainment in this section).
6. *Day Care/Child Care.* A day care/child care facility is defined by the Revised Code of Washington state statute and may be a family child day care home or child care center. Additionally, Washington State licensing requirements will apply to day care/child care facilities. An Adult Day Care is defined by the provision of daytime services, including respite, recreational, social and therapeutic activities, to disabled and/or elderly adults in a group setting.
    a. *Family Child Day Care Home.* A facility where a person regularly provides care during part of the twenty-four (24) hour day to twelve (12) or fewer children.
    b. *Child Care Center.* A person or agency that provides care for thirteen (13) or more children during part of the twenty-four (24) hour day.
    c. *Adult Family Home.* A dwelling, licensed by the state of Washington department of social and health services, in which a person or persons provide personal care, special care, room and board to more than one but not more than six adults who are not related by blood or marriage to the person or persons providing the services. An adult family home may be licensed to provide care to up to eight adults if the home receives approval under WAC 388-76-10031 or 388-76-10032.
    d. *Institutional Adult Day Care.* Provision of adult day care services for nine or more adults either in a residential or institutional, e.g., nursing home, setting.

7. *Detention and Post-Detention Facilities.* Uses which have the characteristics of Group Living but are devoted to the housing, training and supervision of those under judicial detention. Examples include prisons; jails; probation centers; juvenile detention homes; and related post-incarceration and halfway houses. Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act. Detention and post detention facilities do not include secure community transition facilities as per Chapter 20.150 VMC.
8. *Emergency Services.* Public safety facilities including police and fire stations, and emergency communications, but not including ambulance services.
9. *Medical Centers.* Facilities providing inpatient, outpatient, emergency, and related ancillary services to the sick and infirm, including drug and alcohol treatment. Usually developed in campus setting. Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act. Accessory uses may include diagnostic and treatment facilities; laboratories; surgical suites; kitchen/food service facilities; laundry; housekeeping and maintenance facilities; administrative offices; and parking. Medical centers may also include freestanding offices for hospital-based and/or private-practice physicians and other allied health care professionals; these medical office buildings are regulated as offices (see Office Uses -Medical Office of this section).
10. *Religious Institutions.* Permanent places of religious worship. May include on-site functions related to ministry to the poor such as emergency overnight shelter, food service, group meals and food and clothing pantries. Accessory uses may include related accessory uses that are clearly incidental and secondary to religious worship, congregation, and teaching such as administrative offices; childcare centers/preschools; classrooms for religious instruction; auditoriums; social halls; rectories; and gymnasiums, playgrounds and other recreational facilities.
11. *Schools.* Public and private preschool, kindergarten, elementary, middle, and high schools. Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act. The programs and activities of other public and nonprofit organizations including those associated with adult education, after-school care, recreation and social services may collocate in a school facility. Accessory uses include administrative offices; classrooms and laboratories; kitchen/cafeterias; auditoriums; gymnasium, swimming pools; playing fields and related indoor and outdoor physical education facilities; and storage and maintenance facilities.
12. *Social/Fraternal and Clubs/Lodges.* Nonprofit organizations with social, philanthropic and/or recreational functions and activities. Accessory uses include administrative offices; classrooms and laboratories; kitchen/cafeterias; auditoriums; gymnasium, swimming pools; playing fields and related indoor and outdoor physical education facilities; and storage and maintenance facilities.

C. *Active Retail*. Active retail uses include facilities and spaces dedicated to the sale of goods, merchandise, or services directly to consumers. These uses are typically located on ground floors in pedestrian-oriented areas and are designed to generate foot traffic and contribute to the economic vitality and vibrancy of the streetscape.

1. *Artisan and Specialty Goods Production.* Small-scale businesses that manufacture artisan goods or specialty foods. Small manufacturing production aims at direct sales rather than the wholesale market. This small-scale manufacturing use is intended to be allowed where compatible with the commercial and residential fabric of the city center. An allowance for public viewing or customer service space is required with artisan and specialty goods production. This use category includes the following uses: sugar and confectionary, fruit and vegetable preserving and specialty foods, bakeries and tortilla manufacturing; artisan leather, glass, cutlery, hand tools, wood, paper, ceramic, textile and yarn products; microbreweries, micro distilleries, and wineries. 2. *Eating and Drinking Establishments.* Establishments that sell prepared food and beverages for consumption on site or take-away including restaurants, delicatessens, bars, taverns, brew pubs, espresso bars, and group meal service.
2. *Personal Services.* Establishments which provide consumer services such as banks and credit unions; barber and beauty shops; automated teller machines (ATMs), veterinary clinics, real estate agents, mortgage bankers, insurance brokers, other consultants and related automated vending facilities; pet grooming; laundromats and dry cleaners; copy centers; photographic studios; specialized instructional schools; trade/vocational schools; massage therapy; yoga studios; acupuncture; and mortuaries.
3. *Sales-Oriented.* Establishments which provide consumer-oriented sales, leasing and rental of consumer, home and business goods including art; art supplies; bicycles; clothing; dry goods; electronic equipment; fabric; gifts; groceries; hardware; household products; jewelry; pets and pet products; pharmaceuticals; plants; printed materials; stationery; videos; and clothing and food pantries. Excludes large-scale consumer products (see Passive Retail - Bulk Sales); and those sold primarily outdoors (see Passive Retail - Outdoor Sales).
4. *Repair-Oriented.* Establishments which engage in the repair of consumer and business goods including television and radios; bicycles; clocks; jewelry; small appliances and office equipment; tailors and seamstresses; shoe repair; locksmiths; and upholsterers.

D. *Passive Retail Uses*. Secondary retail uses include spaces that complement primary retail uses. Secondary retail is not intended to act as the primary drivers of foot traffic or economic activity in an area. These uses often provide support or specialized goods and services that enhance the overall retail environment.

1. *Animal Kennel/Shelters.* Animal kennel and shelter facilities for the overnight boarding and day care of dogs, cats and other domestic pets. Excludes breeding.

2. *Adult Entertainment.* Facilities including adult motion picture theaters; adult video/book stores; and topless, bottomless, and nude dance halls which include materials and activities characterized or distinguished by an emphasis on matters depicting specified sexual activities or anatomical areas.
3. *Bulk Sales.* Establishments which engage in the sales, leasing and rental of bulky items requiring extensive interior space for display including furniture, large appliances, home improvement sales, and other similar uses.
4. *Commercial and Transient Lodging.* Residential facilities such as hotels, motels, rooming houses, bed-and-breakfast establishments, emergency shelters, and homeless shelters where tenancy is typically less than one month. May include accessory meeting, convention facilities, and food preparation and service.
5. *Dog Day Care.* "Dog day care" shall mean any premises containing four or more dogs, which are five months or older, where these domestic animals are dropped off and picked up daily for temporary care on site and where they may be groomed, trained, exercised, and socialized, but are not kept or boarded overnight, bred, sold or let for hire. Excludes Animal Kennel/Shelters (see Secondary Retail uses - Animal Kennel/Shelters).
6. *Electric Vehicle (EV) Battery Exchange Station.* A facility that will enable an electric vehicle with a swappable battery to enter a drive lane and exchange the depleted battery with a fully charged battery. Such exchange stations may use a fully automated process, which meets or exceeds any standards, codes, and regulations set forth by Chapter 19.27 RCW.
7. *Electric Vehicle (EV) Charging Station (Stand-alone).* A facility located on a private or public lot that provides electric energy for the purpose of charging electric vehicles (EV). An EV charging station may consist of one or more charging points, equipment, and related accessories designed to delivery electrical energy to battery EVs and plug-in hybrid electric vehicles (PHEVs).
8. *Indoor Entertainment.* Commercial indoor facilities such as bowling alleys, arcades, trampoline or bounce house facilities, shooting ranges, movie, and live performance theaters.
9. *Major Event Entertainment.* Facilities such as auditoriums, stadiums, arenas, amphitheaters, convention centers, and racetracks which provide athletic, cultural or entertainment events and exhibits for large groups generally exceeding 1,000 spectators.
10. *Motor Vehicle Sales/Rental.* Includes car, light and heavy truck, mobile home, boat and recreational vehicle sales, rental and service.
11. *Motor Vehicle Servicing/Repair.* Freestanding vehicle servicing and repair establishments including quick and general vehicle service, car washes and body shops not an accessory to new vehicle sales.

12. *Outdoor Sales.* Establishments that engage in sales requiring outdoor display and/or storage including lumberyards and nurseries.

13. *Self-Service Storage.* Commercial operations that provide rental of storage space to the public. The storage areas are designed to allow private access by the tenant for storing or removing personal property. These facilities do not include outdoor storage or moving and storage companies where there is no individual storage or where employees are primary movers of the goods to be stored (see subsection (B)(13) of this section, Warehouse/Freight Movement). No tenant may use a self-service storage facility for residential purposes. "Self-service storage" is synonymous with self-service storage facility and mini-storage.

14. *Vehicle Fuel Sales.* Establishments engaging in the direct-to-consumer sale of gasoline, diesel fuel, and oil products for cars, trucks, recreational vehicles, and boats.

15. *Home Occupation.* Commercial, office or other economic activity wholly contained within the residence or accessory building within which it is located, and is clearly subordinate to the primary residential use.

E. *Office Uses*. Office uses include spaces used for professional, administrative, business, or clerical activities, typically conducted indoors with minimal environmental or external impacts on surrounding areas.

1. *Extended Office.* Offices that operate during nontraditional hours including evenings, nights, and weekends. Examples include taxis and other vehicles for hire, funeral homes and accessory crematoria, telemarketing/service centers and internet communication centers. Accessory uses may include fleet vehicle parking, communication switching and other equipment and limited storage of goods.

2. *General Office.* Government, business and professional offices that operate during typical weekday hours. Examples include local, regional, state, and federal offices and agencies; medical and dental laboratories; blood collection centers; offices for attorneys, architects, accountants, engineers, stockbrokers, headquarters offices; sales offices; radio, and television studios. Also includes painting, landscaping, building and janitorial contractors where the indoor storage of materials and equipment are incidental to the office use. If this storage exceeds 50 percent of occupied space, such uses are classified as Employment Services (see Industrial Use Types – Employment Services). Offices that are part of and are located within a firm in another use category are considered accessory to the firm's primary activity. Also excludes medical office and related facilities (see subsection (E)(3) of this section).

3. *Medical Office.* Offices for physicians, dentists, chiropractors, and allied health care professionals; freestanding outpatient health care facilities; urgency clinics; naturopathic, and homeopathic facilities; and home health organizations that provide on-site services to patients and that generally operate during typical peak weekday hours.

F. *Industrial use types.* Industrial uses include production, manufacturing, processing, warehousing, distribution, or repair of goods, outdoor bulk storage, cargo handling, transloading, laydown yards assembly of large equipment and stockpile areas, as well as related research and development. These uses are typically characterized by operations that may generate higher levels of noise, emissions, truck traffic, or other external impacts.

1. *Bulk Fossil Fuel Storage and Handling Facility.* "Bulk fossil fuel storage and handling facility" means any structure, group of structures, equipment, or device that stores or transfers any material derived from prehistoric organic matter, including but not limited to: petroleum and petroleum products, coal, and natural gases, including without limitation methane, propane, and butane. The term does not include facilities that store and handle finished products derived from fossil fuels including but not limited to asphalt, plastics, fertilizers, paints, and denatured ethanol. Bulk fossil fuel storage and handling facilities are greater than 60,000 gallons cumulative storage. The director may refer to RCW 82.38.020 or other state or federal laws to assist in interpretation of this use classification.

2. *Cleaner Fuels Storage and Handling Facility.* Means any structure, group of structures, equipment or device previously classified as bulk fossil fuel storage and handling that is converted to store or transfers any material derived from cleaner fuels, as defined in Chapter 20.150 VMC.

3. *Employment Services.* Includes the repair and servicing of machinery, equipment and/or products where outdoor storage is limited. Examples include building, heating, plumbing or electrical contractors; exterminators; janitorial and building maintenance contractors where the indoor storage of materials is more than incidental to the office use (see Office Uses); laundry, dry cleaning and carpet cleaning plants; and photo-finishing laboratories.

4. *Energy Plants.* A facility or group of facilities capable of generating, storing, and/or distributing electrical energy. This includes methods for new energy generation such as geothermal facilities, sewer thermal capture facilities and central utility plants.

5. *Industrial Services.* Includes the repair and servicing of industrial and business machinery, equipment and/or products. Examples include welding shops; sales, repair, storage, salvage or wrecking of heavy machinery, metal and building materials; towing and vehicle storage; auto and truck salvage and wrecking; heavy truck servicing and repair; and tire recapping and retreading.

6. *Manufacturing and Production.* Includes production, processing, assembling, packaging or treatment of semifinished or finished products from raw materials or previously prepared materials or components. Manufacturing production is intended for the wholesale market rather than for direct sales.
7. *Organic Materials Management Facilities.* A facility that receives, processes, stores, and/or transfers organic materials—including any solid waste that is a biological substance of plant or animal origin capable of microbial degradation. Organic materials include, but are not limited to, manure, yard debris, food waste, food processing waste, wood waste, and garden waste. Organic materials" does not include any materials contaminated by herbicides, pesticides, pests, or other sources of chemical or biological contamination that would render a finished product of an organic material management process unsuitable for general public or agricultural use. "Organic materials management" means management of organic materials through composting, anaerobic digestion, vermiculture, black soldier fly, or similar technologies.
8. *Research and Development.* Facility containing a mix of uses including office, research laboratories, and prototype manufacturing. If the use contains no on-site manufacturing component, then it is considered General Office (see Office uses – General Office).
9. *Small Fossil Fuel or Cleaner Fuel Storage and Distribution Facilities.* Means local distribution gas storage tanks with individual storage capacities of 30,000 gallons or less and cumulative storage of 60,000 gallons or less. Such tanks store fossil fuels or cleaner fuels and are either for local distribution to customers or serve as an accessory facility necessary to support an on-site allowed primary commercial, industrial, educational, scientific, or governmental use and do not otherwise meet the definitions of Bulk Fossil Fuel Storage and Handling Facility in subsection (B)(1) of this section, or Vehicle Fuel Sales in subsection (H)(17) of this section; provided, however, that fuel storage for accessory emergency generators shall not be considered a Small Fossil Fuel or Cleaner Fuel Storage and Distribution Facility, which shall be governed by the primary use allowances and necessary fire code reviews.
10. *Solid Waste Handling Facilities.* Uses that receive solid or liquid wastes from others for disposal on the site or for transfer to another location, uses that collect sanitary wastes or uses that manufacture or produce goods or energy from the composting of organic material. Examples include recycling/garbage transfer stations; landfills; composting, energy recovery and sewage treatment plants; and hazardous waste handling and transfer facilities that do not treat or dispose of hazardous waste, as that term is defined in 40 CFR Part 261. Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act. Hazardous waste or disposal facilities are not included in this classification and are therefore not permitted in the city of Vancouver.

11. *Truck Stops.* A truck stop is a commercial establishment located along transportation corridors, primarily serving the needs of truck drivers and other travelers needing accommodations for long-haul trips in the movement of goods. Facilities may include fueling facilities for heavy duty trucks, including diesel pumps and parking areas.
12. *Warehouse/Freight Movement.* Uses involved in the storage and movement of large quantities of materials or products indoors and/or outdoors; associated with significant truck and/or rail traffic. Examples include freestanding warehouses associated with retail furniture or appliance outlets; household moving and general freight storage; food banks; cold storage plants/frozen food lockers; weapon and ammunition storage; major wholesale distribution centers; truck, marine and air freight terminals and dispatch centers; grain terminals; and stockpiling of sand, gravel, bark dust or other aggregate and landscaping materials.
13. *Wholesale Sales.* Involves sales, leasing or rental of equipment or products primarily intended for industrial, institutional or commercial businesses. Businesses may or may not be open to the general public, but sales to the general public are limited. Examples include the sale or rental of machinery, equipment, building materials, special trade tools, welding supplies, machine parts, electrical supplies, janitorial supplies, restaurant equipment, and store fixtures; mail order houses; and wholesalers of food, clothing, auto parts, and building hardware.

G. *Infrastructure Uses*. Infrastructure uses include facilities and spaces essential for the movement of people and goods, as well as the delivery of critical services across the city. This includes transportation networks, utility systems, rail infrastructure, and communication facilities, all of which support urban functionality, connectivity, and growth.

1. *Airports/Airparks.* Includes aircraft runways, landing strips and uses supporting airport operations such as control towers, hangars, and fuel storage facilities. Also includes uses incidental to airports such as aerial mapping; air cargo warehousing and distribution, airport pilot training schools; aircraft sales and repair; aviation clubs and museums; and public transportation transfer areas. Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act.
2. *Basic Utilities.* Unstaffed community infrastructure, including but not limited to water tanks, sewer pump stations, internet/telephone exchanges, and electric power substations. Excludes facilities that include offices, service centers and/or material storage.
3. *Data Centers.* A data center refers to a facility used to house computer systems and associated infrastructure such as telecommunications and data storage systems.
    a. AI Data Center
        - Specialized Hardware: Uses high-performance GPUs or TPUs instead of just CPUs, as these are better suited for parallel processing required in AI tasks.

- High Computational Power: Designed to handle intensive AI workloads like training machine learning models or running inference tasks.
- Advanced Cooling Systems: Requires robust cooling solutions, such as liquid cooling, to manage the heat generated by high-power hardware.
- Energy Demands: Consumes significantly more power due to the computational intensity of AI operations.
- Storage and Networking: Equipped with advanced storage and networking capabilities to handle large datasets and high-speed data transfer.

b. Non-AI Data Center

- General-Purpose Hardware: Primarily relies on CPUs for standard computing tasks like hosting websites, managing databases, or running business applications.
- Lower Computational Needs: Handles less demanding workloads compared to AI data centers.
- Standard Cooling Systems: Uses traditional air-based cooling systems, as the hardware generates less heat.
- Moderate Energy Use: Consumes less power compared to AI-focused facilities.
- Basic Storage and Networking: Designed for typical data storage and transfer needs.

4. *Heliports.* Public or private facilities designed for the landing, departure, storage, and fueling of helicopters. Allowed as an accessory use to a medical center in applicable zoning district(s).
5. *Major Utility Facilities.* Those facilities which have a substantial public impact, including but not limited to: sewage treatment plants and lagoons; electric generation facilities; and essential public facilities.
6. *Park and Ride Facilities.* "Park and ride facilities" means parking facilities that serve motorists transferring to or from urban public transportation vehicles or private carpool vehicles.
7. *Rail Lines/Utility Corridors.* The regional corridors in public or private ownership dedicated for use by rail lines; above-grade or underground power or communication lines; water, sewer and storm sewer lines or similar services.
8. *Railroad Yards.* A terminus of several light or heavy railroad lines where the loading, unloading, transshipment, switching, maintenance, and storage of rail cars is undertaken.

9. *Structured Parking Facilities.* A parking facility that is constructed as a multi-level building or structure, primarily designed to accommodate a large number of vehicles in an organized manner. They utilize vertical space to maximize the number of vehicles that can be parked within a designated area. Accessory uses may include uses such as electric vehicle (EV) charging stations.
10. *Surface Parking Facilities.* Refers to parking areas located at ground level and consist of paved or unpaved surfaces that are not enclosed within a structure or building. Accessory uses may included uses such as electric vehicle (EV) charging stations.
11. *Transportation Facilities.* Bus, trolley, streetcar; light and heavy rail transit stops, stations and other facilities; water taxi and ferry stations; and accessory bicycle parking. Includes associated fuel storage. Excludes airports (see Infrastructure Uses- Airports/Airparks); public streets and sidewalks; and heavy and light rail maintenance/switching yards (see Infrastructure Uses – Railroad Yards); and heliports (Infrastructure Uses - Heliports). Such a facility that has regional or state-wide significance is classified as an essential public facility by the provisions of the Growth Management Act.
12. *Wireless Communication Facilities.* Includes publicly and privately owned towers and related transmitting equipment for television; FM/AM radio; cellular and two-way radio and microwave transmission; and related ancillary equipment buildings. Does not include radio/television transmission facilities that are part of the public safety network (see subsection (A)(8) of this section, Emergency Services). Does not include amateur (ham) radio antennas or towers.

H. *Parks and Natural Areas.* Public lands that are preserved or developed for outdoor activities, ecological function, or community interaction. They are managed and maintained to protect or enhance natural resources and/or developed for public passive and active recreation. These spaces are regulated by their form, design elements, and relationship to surrounding structures, and land uses rather than specific activities alone. Examples include parks, natural areas and open spaces, civic plazas, linear parks, recreational trails, nature and wildlife preserves and interpretive facilities.

1. *Agriculture/Horticulture.* Open areas devoted to the raising of fruits, vegetables, nuts, nursery stock and/or flowers, including community gardens; may include on-site sales of products grown on the site. Excludes nurseries (see Outdoor Sales).
2. *Cemeteries.* Facilities for storing human remains. Accessory uses may include chapels, mortuaries, crematoria, mausoleums, administrative offices, maintenance facilities, and parking.
3. *Environmental Management and Education.* A range of activities focused on the conservation, restoration, and sustainable management of natural resources, as well as public education on environmental topics such as habitat restoration, stormwater management, guided tours, research and monitoring, renewable energies, and waste reduction/recycling.

4. *Fish Hatcheries.* A hatchery is a facility that includes the necessary structure and equipment for successful breeding, rearing, and growth of fish growth phase of fish and other aquatic organisms, including tanks, ponds, filtration systems, and possibly processing areas for feed storage and handling.
5. *Marina.* A facility that provides secure moorings for recreational or commercial boats.
6. *Motorized Recreational Activities.* Any outdoor recreational activity that involves the use of motorized vehicles or equipment for the purpose of leisure, entertainment, or sport. This includes, but is not limited to, activities such as all-terrain vehicle (ATV) riding, motorcycle riding, off-road vehicle (ORV) use, snowmobiling, and motorized boats.
7. *Parks and Natural Areas (urban).* Urban Parks and Natural Areas include public resources lands and trail assets developed or preserved for active and passive outdoor activities, ecological function, natural resource protection, and community interaction. These spaces are regulated by their design elements, and relationship to surrounding land uses. Typical assets vary by size, character, and site natural site resources, but may include play structures, sport courts and/or sport fields, turf, trees, landscape areas and native plant resource areas, pathways and trails, picnic tables, picnic shelters, benches, skate parks, water play features, community event spaces, boat launches, community gardens, and public art, interpretation and cultural features.
    a. Neighborhood parks are small parks usually no greater than five acres designed to serve the surrounding neighborhood. Access is on foot or bicycle with little or no on-site parking provided. Accessory uses may include low-impact outdoor playing/practice fields (without associated parking), playgrounds, sports courts, picnic areas, educational/interpretive facilities, walking/jogging paths, restrooms, and seating areas. May collocate with schools.
    b. Community parks are larger parks typically 15 acres or larger designed to serve a larger geographic area than a neighborhood park. Access is on foot and by bicycle, transit, and vehicle. May contain one or more Community Recreation uses (see Civic / Institutional use types- Community Recreation). Accessory uses may include playgrounds, water play, path system, picnic shelters, outdoor performance and event facilities, off-leash dog parks, bicycle, and skateboard parks, sports courts, community gardens, educational/interpretive facilities, viewpoints, concessions, and support facilities such as restrooms, caretaker and maintenance facilities, and parking. May collocate with natural areas, Community Centers (see Civic / Institutional use types- Community Recreation) and schools.

8. *Parks and Natural Areas* (*Regional parks).* Regional Parks and Natural Areas are similar to Urban Parks and Natural Areas but are typically larger in size and include a broader spectrum of assets depending on the location and natural resources of the location. They are designed to accommodate large numbers of people, including sporting and community events with a local and regional draw. These spaces are regulated by their design elements, and relationship to surrounding land uses. Accessory uses include any of the facilities found in community parks and often include large passive recreation natural areas and resource lands, as well as any of the facilities found in neighborhood and community parks. Some regional facilities may allow a caretaker residence.

9. *Trails.* Publicly accessible walking, jogging or bike trails that extend beyond the boundaries of a single subdivision, park, or development project. Accessory uses may include way-finding and interpretive signage, interpretive centers, viewpoints, and trailheads with restrooms and parking.

I. *Other use types*.

a. *Temporary Uses.* Includes uses that are temporary or interim in nature that are not subject to full compliance with the development standards for the applicable zoning district, or by which the city may allow seasonal or transient uses not otherwise permitted. Uses may include seasonal or special events involving tents, canopies, membrane structures or storage containers. Situations caused by an unforeseen event deemed by the Planning Official to be an emergency situation or a temporary trailer or prefabricated building for us on any commercial or industrial zoned property as temporary commercial or industrial office or space associated with the primary use.

b. *Seasonal or special events.* Seasonal or special events which involve the placement of tents, canopies, membrane structures or storage containers.

c. *Temporary Storage Units.* Temporary storage units are box-like containers used for storing household items that are being moved to another location or being stored during a home remodel projects.

d. *Unforeseen Emergency Situations.* This type of temporary use is one for which there is a need because of an unforeseen event such as fire, windstorm, flood or other event deemed by the Planning Official to be an emergency situation.

20.160.030 Unlisted Use: Authorization of Similar Use.

A. *Purpose.* It is not possible to contemplate all of the various uses that will be compatible within a zoning district. Therefore, unintentional omissions occur. The purpose of these provisions is to establish a procedure for determining whether certain specific uses would have been permitted in a zoning district had they been contemplated and whether such unlisted uses are compatible with the listed uses.

B. *Process.* The Planning Official shall render an interpretation by means of a Type I permit, as governed by Chapter 20.255 VMC, Interpretations and Minor Adjustments.

C. *Approval standards.* The Planning Official shall use the following criteria to determine the appropriate category for an unlisted use as follows:

1. Approval or denial of an unlisted use application by the Planning Official shall be based on findings that:

a. The use is consistent with the intent and purpose of the applicable zoning district;

b. The use is similar to and of the same general type as the typical uses listed in the zoning district;

c. The use has similar intensity, density, and off-site impacts as the typical uses listed in the zoning district; and

d. The use has similar impacts on the community facilities as the typical listed uses. Community facilities include streets, schools, libraries, hospitals, parks and natural areas, police and fire stations, water, sanitary sewer, and storm drainage systems.

D. *Maintaining list.* The Planning Official shall maintain a list by zoning district of approved unlisted uses and the list shall have the same effect as an amendment to the use provisions of the applicable zone.

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CHAPTER 20.170
MEASUREMENTS

Sections:

20.170.010 Purpose.

20.170.020 Measuring Number of Items Required.

20.170.030 Measuring Distances.

20.170.040 Measuring Distances on Maps.

20.170.050 Measuring Height.

20.170.060 Determining the Area of the Facade of a Building.

20.170.070 Measuring Lot Widths and Depths.

20.170.090 Measuring Tree Diameter.

20.170.100 Measuring the Root Protection Zone.

20.170.010 Purpose.

The purpose of this chapter is to set the standards for calculating measurements required in the development code.

20.170.020 Measuring Number of Items Required.

A. When any measurement technique for determining the number of items required or allowed, including but not limited to parking or bicycle spaces, dwelling units or required trees or shrubs, results in a fractional number, the number shall be rounded as follows:

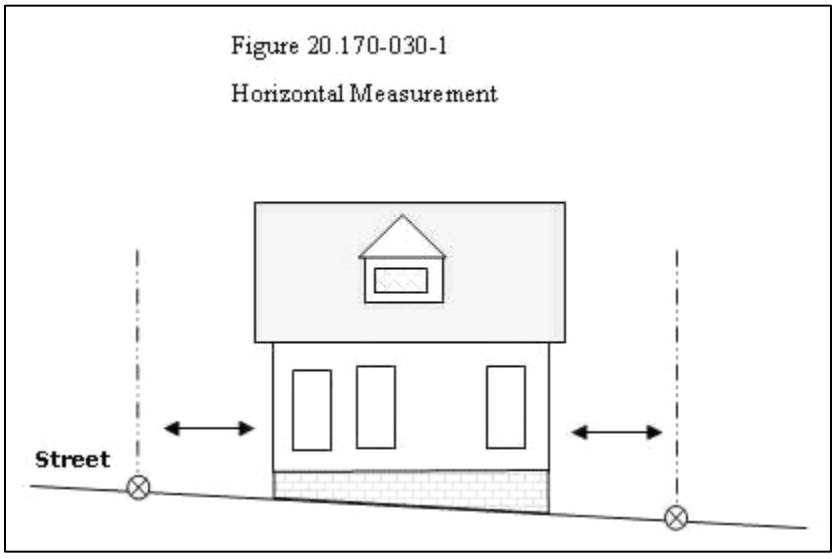
1. *Minimum requirements.* When a regulation is expressed in terms of a minimum requirement, any fractional result will be rounded up to the next consecutive whole number. For example, if a minimum requirement of one tree for every 30 feet is applied to a 50-foot strip, the resulting fraction of 1.67 is rounded up to two required trees. Minimum density shall be rounded down for the purposes of calculating minimum density in each base district.

2. *Maximum limits.* When a regulation is expressed in terms of maximum limits, any fractional result will be rounded down to the next lower whole number.

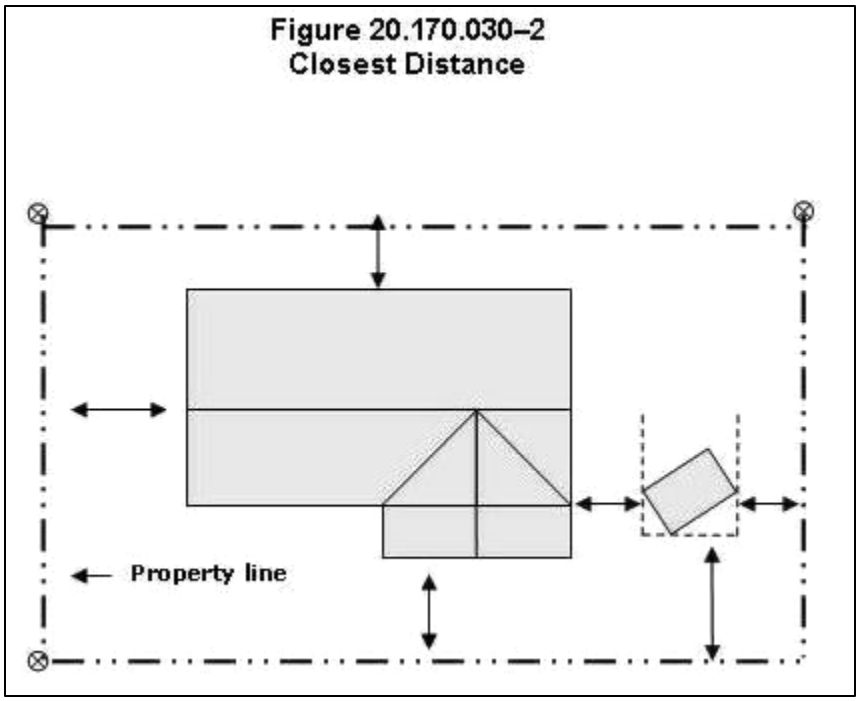
20.170.030 Measuring Distances.

A. When any measurement technique for determining required minimum or allowed maximum dimensions, including but not limited to height, yards, setbacks, lot coverage, opens space, parking stall size or street width, results in a fractional number, the dimension shall be measured to the nearest inch. Any fraction less than one-half of an inch shall be disregarded and fractions of one-half-inch or larger shall be included in the measurement. Note: Where illustrations conflict with the text of this section, the text shall control.

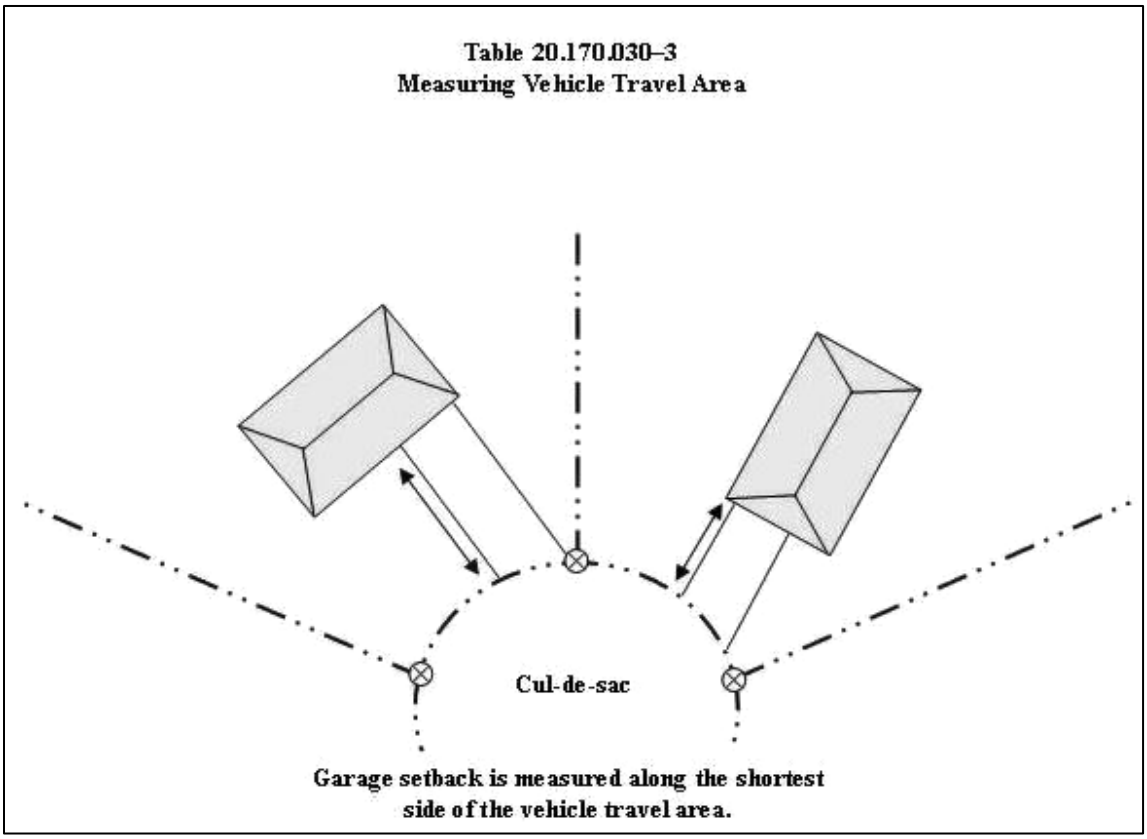
B. *Distances are measured horizontally.* When determining distances for setbacks, build-to lines, structure dimensions, and buffers, all distances are measured along a horizontal plane from the appropriate property line, critical area boundary, edge of building, structure, storage area, parking area or other object. These distances are not measured by following the topography of the land. See Figure 20.170.030-1.



C. *Measurements are shortest distance.* When measuring a required distance, such as the minimum distance between a structure and a lot line, the measurement is made at the shortest distance between the two objects, and perpendicular to the lot line. See Figure 20.170.030-2. For the purposes of Chapter 20.720 VMC, Critical Areas Protection, the measurement is made at the shortest distance between two objects or boundaries without respect to the lot line. Other exceptions are stated in Subsection D, E, and F.

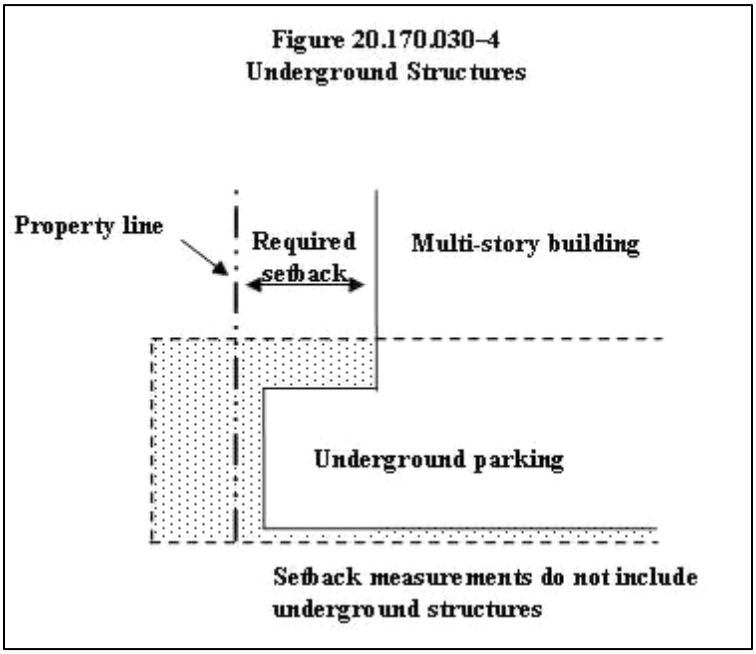


D. *Measurements of vehicle travel areas.* Minimum vehicle travel area for garage entrance setbacks is measured along the shortest side of the vehicle travel area. See Figure 20.170.030-3.



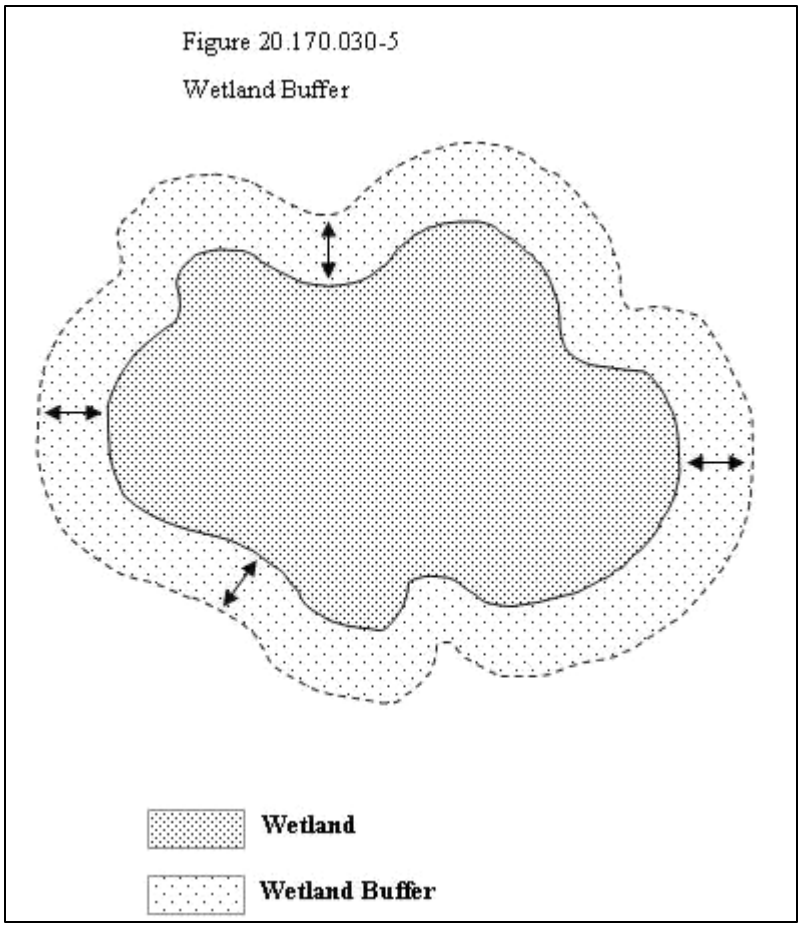
E. *Measurements involving a structure.* Measurements involving a structure are made to the closest wall of the structure. Chimneys, eaves, and bay windows up to 12 feet in length, are not included in the measurement. Other items, such as covered porches, and entrances are included in the measurement. See Figure 20.170-2, above.

F. *Underground structures.* Structures or portions of structures that are entirely underground are not included in measuring required distances. However, this shall not be interpreted to mean that underground construction is allowed to encroach under public rights-of-way, easements or other property without a street use permit. See Figure 20.170.030-4. For the purposes of Chapter 20.720 VMC, Critical Areas Protection, structures or portions of structures that are entirely underground are included in measuring required distances.

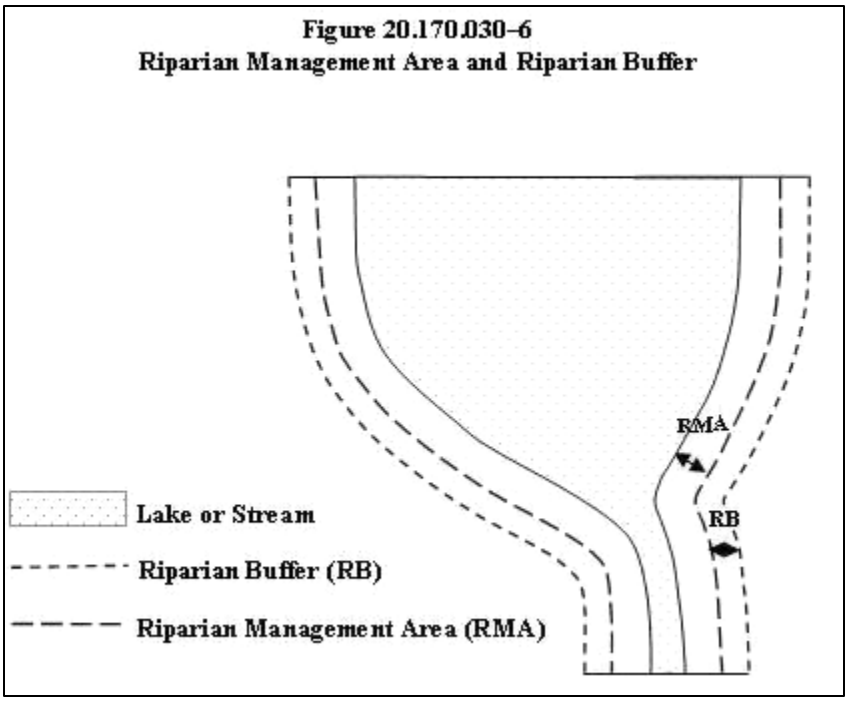


G. *Landscaping.* Measurements of the dimensions of a landscaped area include only the area that is actually landscaped and not any other elements such as protective curbs.

H. *Wetland Buffer.* See Section 20.720.140(C)(1)(b) VMC.

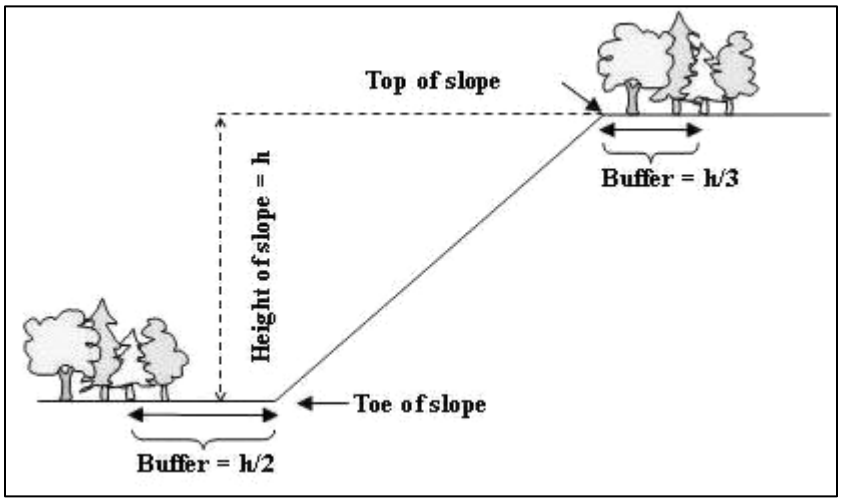


I. *Riparian Management Area and Riparian Buffer.* See Section 20.720.110 (A)(1) VMC.

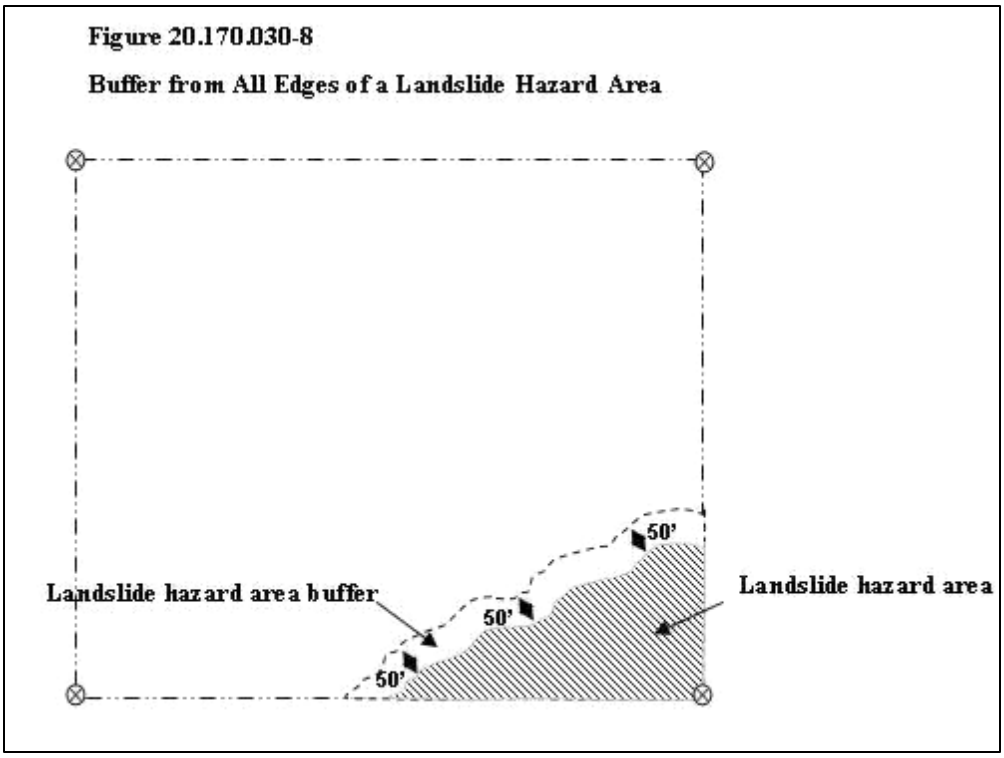


J. *Buffers from the Top or Toe of a Steep Slope.* See Section 20.720.130 VMC.

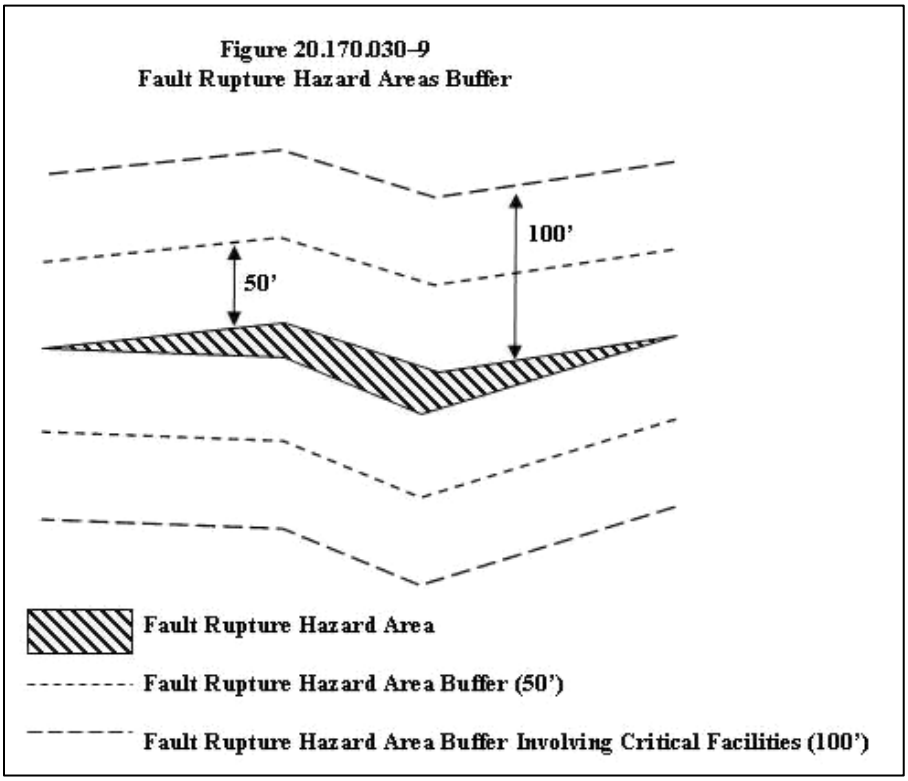
FIGURE 20.170.030-7. BUFFERS FROM THE TOP OR TOE OF A STEEP SLOPE



K. *Buffer from All Edges of a Landslide Hazard Area.* See Section 20.720.130(B)(2)(j)(i)(B) VMC.



L. *Fault Rupture Hazard Areas Buffer.* See Section 20.720.130(B)(1)(b) VMC.

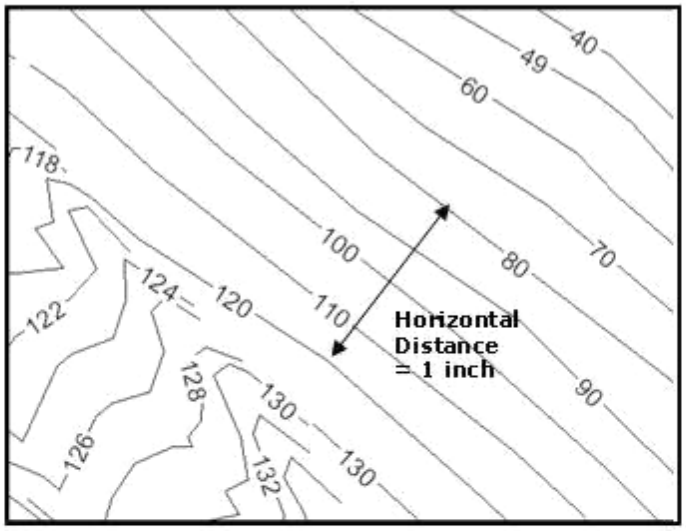


20.170.040 Measuring Distances on Maps.

A. *Zone boundaries.* Zone boundaries that are shown crossing lots are usually based on a topographic feature or a set measurement from a property line or topographic feature, such as the top of slope or stream bank or middle of a stream. When zone boundaries are shown crossing properties with no clear indication of the basis for the line, exact distances are to be determined by scaling the distances from the Official Zoning Maps, using the center of the zoning line.

B. *Calculating Slope from a Topographic Map.* See Section 20.720.130 VMC.

Figure 20.170.040–1
Calculating Slope from a Topographic Map



1 inch = 50 feet

Percent Slope = Rise/Run x 100, where
Rise = Vertical distance read from contour lines, and
Run = Horizontal distance measured between contour lines.

Rise = Vertical distance read from contour lines = 120 – 80 = 40 feet

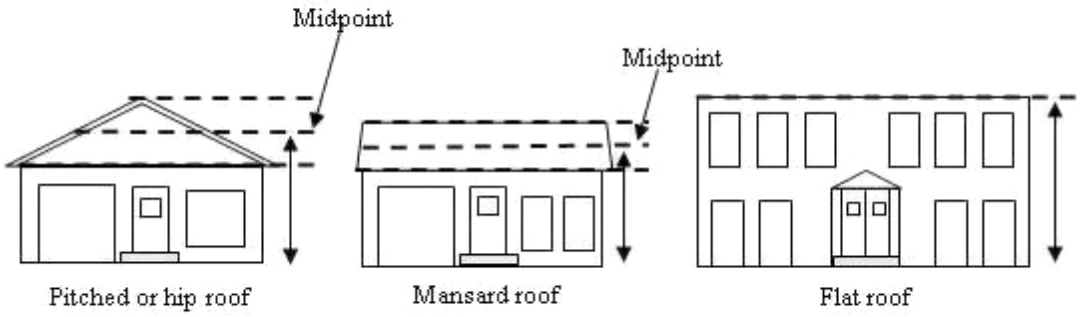
Run = Horizontal distance measured between contour lines = 1 inch.
Scale indicates 1 inch = 50 feet.

Percent Slope = Rise/Run x 100 = 40 feet/50 feet x 100 = 80%

20.170.050 Measuring Height.

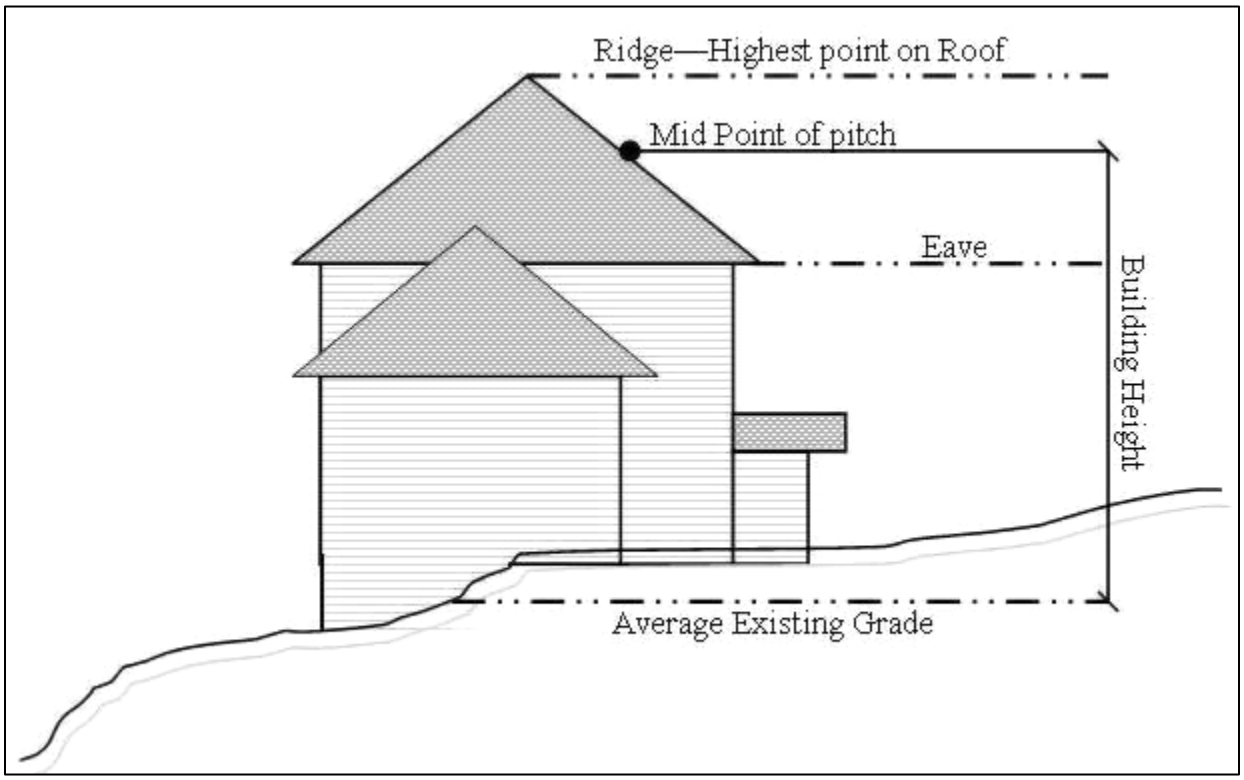
A. *Measuring building height.* Height of buildings is measured from the vertical distance from the average grade to the average height of the roof peak of the building, except in a shoreline jurisdictional area, in which case the height shall be measured from average existing grade (prior to development) to the highest point of a structure (see also WAC 173-27-030). For exceptions subject to airport height limits located within the approach, transitional and horizontal surfaces refer to Chapter 20.570 VMC.

Figure 20.170.050–1
Measuring Building Heights



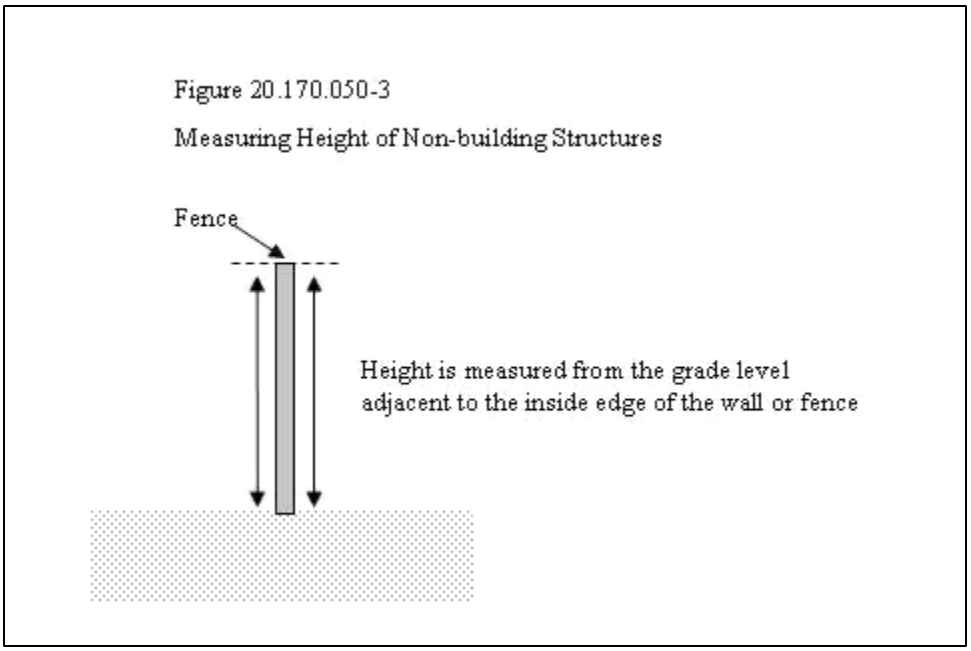
Building height is measured at midpoint between eaves and peak of roof.

FIGURE 20.170.050-2. MEASURING BUILDING HEIGHT WITH VARIATIONS IN GRADE



B. *Measuring height of other structures.* The height of other structures such as flag poles and fences is the vertical distance from the ground level immediately under the structure to the top of a structure, excluding exempted portions. When chimneys and other objects are allowed to exceed the base height of the zone by a set amount, that set amount is measured to the top of these objects. Special measurement provisions are also provided below.

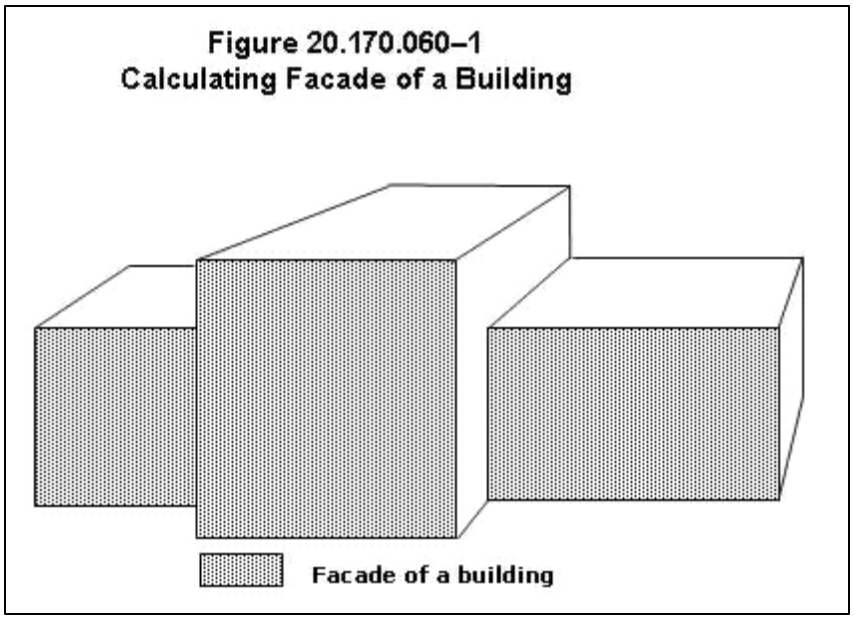
1. Height is measured from the grade level adjacent to the inside edge of the wall or fence.



2. *Measuring height of decks.* Deck height is determined by measuring from the ground to the top of the floor of the deck if there is no rail or if the rail walls are more than 50% open, and from the ground to the top of the rails for all other situations.

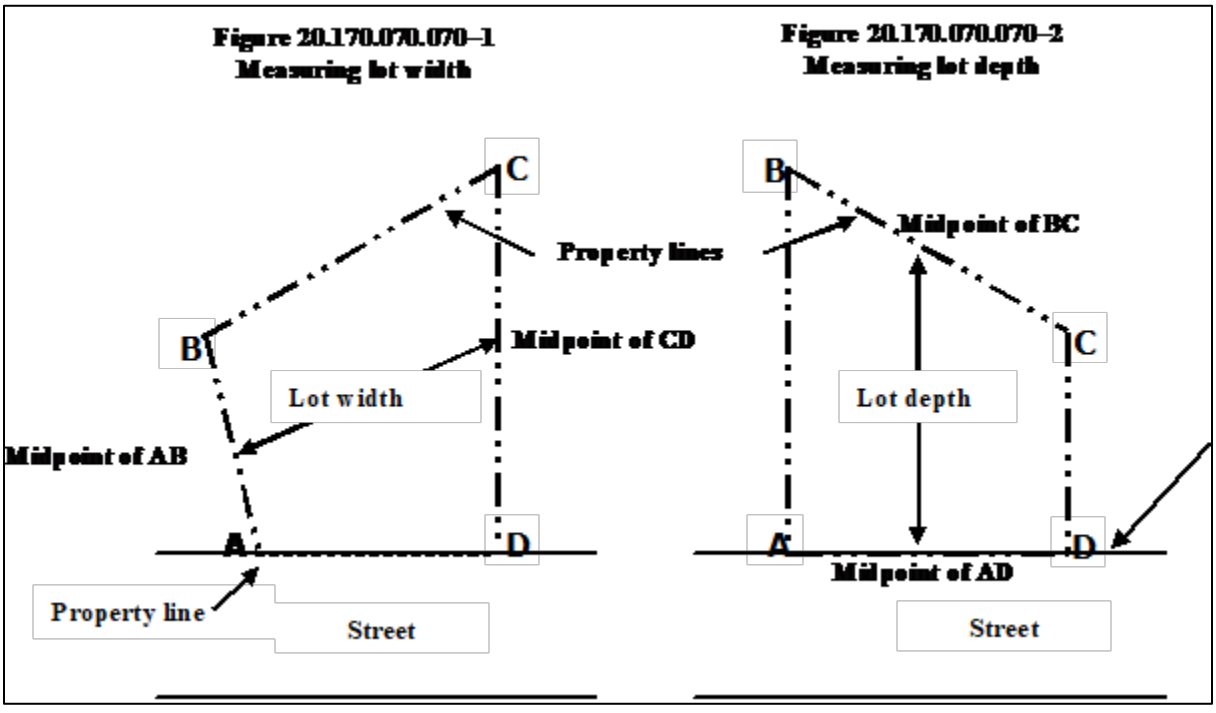
20.170.060 Determining the Area of the Facade of a Building.

A. *Criteria for determining the area of the façade of a building.* The area of a specific facade of a building is determined by adding the square footage of surface area of each section of wall visible from that perspective. For buildings with more than one wall along one façade, for example, rooms jutting out from the main building or a building where each floor is set back from the floor below, all of the walls are included in the total area. The total area does not include any roof area. See Figure 20.170.060-1.



20.170.070 Measuring Lot Widths and Depths.

A. *Criteria for measuring lot widths and depths.* Lot widths and depths are measured from the midpoints of opposite lot lines. See Figure 20.170.070-1 and Figure 20.170.070-2.



B. *Criteria for measuring flag lot widths and depths*. Flag lot widths and depths are measured from the midpoints of opposite lot lines of the flag portion of the lot, excluding the access stem. Flag lots shall be exempt from front and side build-to-lines.

20.170.090 Measuring Tree Diameter.

A. *Existing trees.* Existing trees are measured at a height of 4 1/2 feet above the ground. Trees on slopes are measured from the ground level on the lower side of the tree. If the tree splits into multiple trunks below 4 1/2 feet, the trunk is measured at its most narrow point below the split.

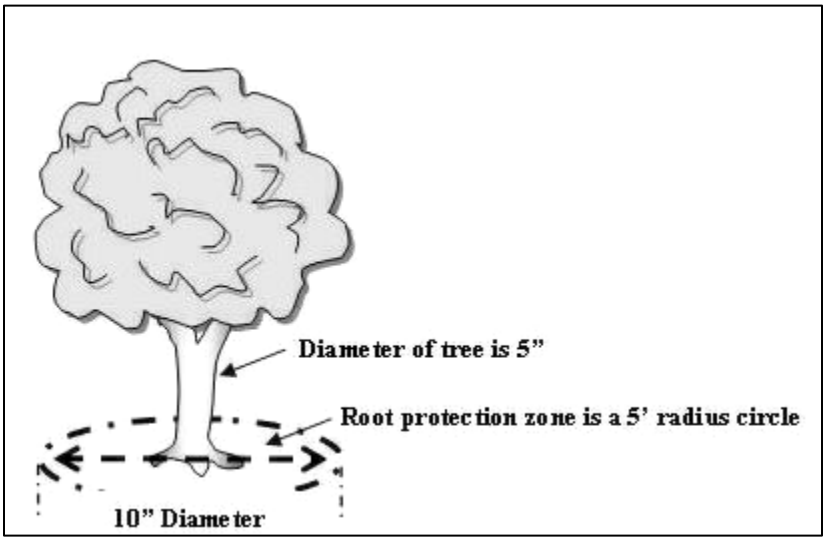
B. *New trees.* New trees are measured in caliper inch, which is the diameter of the trunk 6 inches above the ground for up to and including 4 inches caliper size and 12 inches above the ground for larger trees.

C. *Tree Diameter.* Tree diameter is measured by taking the circumference of the tree at the height, described in Items A and B above, and dividing the result by 3.14.

20.170.100 Measuring the Root Protection Zone.

A. *Root protection zone.* The root protection zone is a circular area around a tree that is based on the diameter of the tree. Each 1 inch diameter of tree equals 1 foot radius for the root protection zone, as illustrated in Figure 20.170.100-11.

FIGURE 20.170.090-11. MEASURING THE ROOT PROTECTION ZONE



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CHAPTER 20.180
DENSITY REQUIREMENTS

Sections:

20.180.010 Purpose.

20.180.020 Minimum Density.

20.180.030 Calculating Density.

20.180.010 Purpose.

General. The purpose of the density requirements is to establish minimum residential density standards for each base zoning district to ensure the efficient use of land and infrastructure. The density requirements are intended to provide clarity, consistency, and predictability in the application of residential density standards.

20.180.020 Minimum Density.

A. The net density of a development must meet or exceed the minimum density of the zoning district as required in Chapter 20.410 VMC, Zoning Districts.

B. *Applicability*. Minimum density requirements only apply to new development and complete redevelopment. The following are exempt from minimum density requirements:

1. When no dwelling units are proposed.

2. Lots developed or approved before June 30, 2026, in the Low-Scale Neighborhood (LS) district and will be developed with a total of six (6) or fewer dwelling units per parent parcel.

3. Lots developed or approved before June 30, 2026, in the Medium-Scale Neighborhood (MS) district where there are six (6) or fewer existing dwelling units that are demolished and will be developed (building permit submitted) with the same number of dwelling units or more within three (3) years of demolition. This period may be extended by the Planning Official for up to an additional one (1) year, if the property owner submits written documentation demonstrating that delays related to active insurance claims, open estate probate or other filed and pending legal action related to the property are delaying their ability to submit building permits and that an extension is reasonable to meet the intent of the exception.

4. When twenty-five (25%) or more of the gross ground-floor area will consist of Active Retail Uses, Office Uses, or Passive Retail Uses (Section 20.430.040 VMC).

C. *Existing Housing.* On lots containing an existing dwelling or dwellings as of June 30, 2026, a lot no greater than one (1) acre may be created around said existing housing with the remainder platted to create the number of dwelling units required by the minimum density established for the zoning district in which the lot or lots are located.

D. *Fractional Units.* When the calculated minimum number of dwelling units required for a development contains a fraction of a dwelling unit, the applicant may round down to the nearest whole dwelling unit.

20.180.030 Calculating Density.

A. For the purposes of meeting minimum density, net density is the area of the development divided by the number of dwelling units within the development.

B. *Area of development.* The following may be excluded in calculating the area of the development:

1. Area required by the City for public or private streets, schools, or other public facilities.
2. Private road easements.
3. Critical areas and associated buffers.
4. Critical root zones of trees in fair and good condition to be retained.
5. Bonneville Power Administration (BPA) easements.
6. Water detention/retention ponds.
7. Parks or public recreation facilities dedicated as an integral part of the development.

C. *Value per Unit Type.* For the purposes of meeting minimum density, the dwelling unit type may be factored in and contribute to the net density according to Table 20.180.030-1.

D. *Co-living housing density*. Each sleeping unit will be counted as 0.25 units for the purposes of calculating dwelling unit density for co-living housing density.

TABLE 20.180.030-1 VALUE PER UNIT TYPE

Dwelling Unit Type	Value for Net Density Calculation
Studios/One (1) bedroom.	One (1).
Two (2) bedrooms.	One and one-quarter (1.25).
Three (3) bedrooms or more.	One and one-half (1.5).

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CHAPTER 20.190
FEES

Sections:

20.190.010 Purpose.

20.190.020 Application and Service Fee Policy.

20.190.030 Fees Payable.

20.190.040 Refunds.

20.190.050 Revisions.

20.190.060 Planning Fees.

20.190.070 Development Engineering Fees.

20.190.080 Fire Review Fees.

20.190.010 Purpose.

A. *Requirements of the uniform codes and ordinances.* The uniform codes and ordinances adopted by the city of Vancouver concerning land use, development, and building require the community development department to perform certain reviews, approvals, and inspections to support land development, new construction, issue permits, periodically inspect existing occupancies to assure compliance with the codes and ordinances. Appropriate fees will be collected for these reviews, approvals, and inspections. Any applicant desiring or being required to obtain review, approval, permit issuance or inspections pursuant to the uniform codes, standards, and ordinances adopted by the city of Vancouver shall pay the applicable fees.

B. *Procedures and standard fee provisions.* This section establishes the procedures and standard provisions for fees set forth in the following sections:

1. Section 20.190.060 VMC, Planning Fees.
2. Section 20.190.070 VMC, Development Engineering Fees.
3. Section 20.190.080 VMC, Fire Review Fees.

20.190.020 Application and Service Fee Policy.

Fee policy. It is the general policy of the city of Vancouver that the community development department adopt application and service fees at a level sufficient to cover the costs or a substantial portion of the costs, associated with conducting reviews, and providing services. Fees for applications or services should generally be collected by the city at the time or as close as possible to the time that costs are incurred. General fund support for certain activities will be provided where necessary.

20.190.030 Fees Payable.

A. *Complete payment with submittal.* All fees shall be payable at the time of submittal of an application for processing, unless specifically stated otherwise.

B. *Payment to include all applicable fees.* Unless specifically stated otherwise, all application fees are in addition to other city fees that may be applicable.

C. *Updated fee policy.* Fees shall be those fees that are in effect at the time an application is submitted and determined to be "counter complete" as defined in Section 20.210.090 VMC.

20.190.040 Refunds.

Types of refunds. A full or partial refund may be approved by the planning official or other appropriate department head when an application is withdrawn prior to the expenditure of staffing resources.

20.190.050 Revisions.

Development review fees. Effective January 1, 2023, and January 1st of each year thereafter, development review fees shall be adjusted annually pursuant to the methodology set forth in VMC 3.08.100. Each such newly adjusted fee shall be rounded to the nearest whole dollar with $0.50 or more being rounded to the next higher dollar and $0.49 or less to the next lower dollar. Fees based on valuation, per head or device, per lineal foot or square foot and per section shall be excluded from rounding to the nearest whole dollar.

20.190.060 Planning Fees.

Required planning fees. Fees for planning-related applications, permits, and services are set forth in Table 20.190.060. For Cost Recovery fees listed in Table 20.190.060, applicants or persons requesting reports will be required to sign an agreement that they will pay the actual cost of the work being performed. Actual costs will be calculated based on the salary and benefits of the employees performing work plus overhead at a rate of 30 percent.

TABLE 20.190.060.

Section	Activity	2026 Fees
1.	**Address Changes – New/Revised**	$259.00
2.	**Airport Height Combining District**	$902.00
3.	**Appeals (to Hearing Examiner, Planning Commission, or City Council)**	
A.	Filed by a recognized city neighborhood association	$191.00
B.	Involving six or fewer dwelling units	$887.00
C.	All other (see SEPA fees for SEPA procedural appeal fee)	$2,537.00
4.	**Archaeological Review**	
A.	Predeterminations	
1.	Base fee	$825.00
2.	Plus fee per acre for each acre more than five	$140.00
B.	Surveys and other special studies	Cost recovery[2]
5.	**Binding Site Plan**	
A.	Conceptual – Requiring subsequent site plan review	
1.	Same as comparable short subdivision or subdivision	See Short Subdivision or Subdivision
B.	Detailed – Not requiring subsequent site plan review	
1.	Same as comparable short subdivision or subdivision	See Short Subdivision or Subdivision
2.	Plus one-half comparable site plan review	See Site Plan Review
6.	**Boundary Line Adjustments/Administrative Lot Split**	
A.	Base fee	$1,332.00
B.	Plus fee per lot for each additional lot more than two	$432.00
7.	**Comprehensive Plan Map Amendments (includes rezone in conjunction with plan amendment)**	
A.	Proposals 2.5 acres or less in size	$7,500.00
B.	Proposals greater than 2.5 acres and up to 10 acres in size	$10,000.00
C.	Proposals greater than 10 acres in size	$15,000.00
8.	**Conditional Use Permit**	
A.	Initial (community centers, group meal service, shelters)	$1,904.00
B.	Initial (all others)	$10,722.00
C.	Major modification, Type III	$1,904.00
D.	Minor modification, Type I	$432.00
9.	**Continuance of Public Hearing**	
A.	Initiated by applicant after public notice is mailed	$2,537.00
B.	Resulting from inadequate information provided by the applicant. Does not apply in cases where new information is presented at the hearing by staff or other parties.	$2,537.00
C.	Hearing examiner reconsideration request	$2,537.00
10.	**Covenant Release – Full and Partial**	$11,288.00

Section	Activity	2026 Fees
11.	**Critical Areas Permit**	
A.	Statement of exemption review	$795.00
B.	Six or fewer dwelling units (fee per applicable critical area)	
1.	Fish and wildlife habitat areas	$1,588.00
2.	Frequently flooded areas	$1,588.00
3.	Geologic hazard areas	$1,588.00
4.	Wetland areas	$1,588.00
C.	All others (fee per applicable critical area)	
1.	Fish and wildlife habitat areas	$3,177.00
2.	Frequently flooded areas	$3,177.00
3.	Geologic hazard areas	$3,177.00
4.	Wetland areas	$3,177.00
D.	Minor exception request	$1,059.00
E.	Reasonable use request	
1.	Six or fewer dwelling units	$5,582.00
2.	All others	$11,103.00
F.	Digitizing critical areas geographic information	Cost recovery
12.	**Design Review (Downtown)**	
A.	Minor exterior reviews only	$763.00
B.	All others, including new buildings	$2,537.00
13.	**Development Agreement**	
A.	Initial	$8,534.00
B.	Modification	$3,912.00
C.	Extension	$726.00
14.	**Extension of Preliminary Approval**	$887.00
15.	**Grading and Erosion Control Permit**	
A.	50 cubic yards or less and less than one foot in depth	No fee
B.	51 to 100 c.y. or greater than one foot in depth	$166.00
C.	101 to 500 c.y.	
1.	Base fee	$333.00
2.	Plus fee per 100 c.y. (or fraction thereof) above 500 c.y.	$24.00
3.	Maximum total grading and erosion control fee	$452.00
D.	Fees resulting from work in progress without a permit	2 × regular fee
16.	**Historic Preservation Reviews**	
A.	Major modification	$1,060.00
B.	Historic Registry	$1,060.00
C.	Special Valuation	$1,060.00

Section	Activity	2026 Fees
17.	**Home Occupation**	
A.	General	$252.00
B.	Penalty – When application is received after code enforcement action has been initiated	2 × regular fee
18.	**Joint Use Parking Agreement**	$1,427.00
19.	**Land Use Review**	
A.	Middle Housing – Six dwelling units or less	
1.	Initial dwelling unit fee (may already be existing and not charged)	$265.00
2.	Additional fee per dwelling unit (units 2-6)	$66.25
3.	Residential appurtenances, i.e. sheds, decks, driveways, fences, etc.	$134.00
B.	Demolition Permit	$134.00
C.	Tenant Improvement or Multifamily Remodel	$238.00
20.	**Lot Determination**	
A.	Base fee (one to two lots)	$2,780.00
B.	Plus per-lot fee over two	$887.00
21.	**Master Plan**	
A.	Conceptual (requiring subsequent site plan review)	$9,862.00
B.	Detailed (not requiring subsequent site plan review)	$9,862.00 plus one-half applicable site plan review fee
C.	Hybrid (conceptual approval for overall site, plus partial detailed approval)	$9,862.00 plus one-half applicable site plan review fee for area for which detailed approval is sought
22.	**Planning Official Review**	
A.	Temporary use	
1.	Seasonal or special event	$122.00
2.	Temporary sales office, model home, or unforeseen emergency	$374.00
3.	Temporary use in a commercial or industrial district	$1,752.00
B.	Similar/Nonconforming use determination or other	$1,752.00
23.	**Plat Alteration**	$8,194.00
24.	**Post-Decision Reviews**	
A.	Post-decision review – Type I	$432.00
B.	Post-decision review – Type II	$1,214.00
C.	Post-decision review – Type III	$1,904.00
25.	**Preapplication Conference Process**	
A.	Preapplication conference request (six units or less with critical areas or applicant requested)	$382.00
B.	Preapplication conference request (seven or more residential units and all other)	$1,344.00

Section	Activity	2026 Fees
C.	Preapplication waiver request	$191.00
26.	**Reporting (misc. application and permit information)**	Cost recovery
27.	**SEPA Checklist (Environmental Review)**	
A.	Grading permit	
1.	Residential 1-6 units	$168.00
2.	All other	
a.	Base fee	$1,244.00
b.	Plus fee per acre of land disturbed by the project	$24.00
B.	Subdivision or planned development	
1.	Base fee	$1,016.00
2.	Plus fee per acre of land disturbed by the project	$11.60
C.	Site plan review – Residential	
1.	Base fee per unit up to five units	$252.00
2.	Plus fee per unit more than five	$26.00
D.	Nonprojects (including rezone and annual review applications)	$2,791.00
E.	All other reviews	
1.	Base fee	$2,031.00
2.	Plus fee per acre of land disturbed by the project	$68.00
F.	SEPA procedural appeal (See "Appeals – All others" for substantive SEPA appeal fee)	$164.00
G.	Environmental impact statement (EIS) review	Cost recovery
28.	**Shoreline Permits**	
A.	Statement of exemption review	$1,059.00
B.	Shoreline substantial development permit	$8,879.00
C.	Shoreline conditional use permit	$9,767.00
D.	Shoreline variance request	$9,767.00
29.	**Short/Unit Lot Subdivisions**	
A.	Preliminary (nine lots or fewer) plats	$8,625.00
B.	Unit Lot Subdivision (nine lots or fewer)	$8,625.00
C.	Final Plat Check	$2,931.00
30.	**Short-Term Rental**	$265.00
31.	**Signs – All Except Sandwich Board Signs**	$432.00
32.	**Site Plan Review (Type I)**	
A.	Residential	
1.	Base fee	$1,752.00
2.	Plus fee per dwelling unit	$66.25
3.	Maximum per dwelling unit fee	$5,000.00

Section	Activity	2026 Fees
B.	Nonresidential	$1,752.00
C.	Qualifying planned action	Same as Type II site plan review fees
33.	**Site Plan Review (Type II) – Residential**	
A.	Base fee	$2,194.00
B.	Plus fee per unit	$152.00
C.	Maximum fee	$30,929.00
34.	**Site Plan Review (Type II) – Nonresidential**	
A.	General case	
1.	Base fee	$5,961.00
2.	Plus fee per sq. ft. – Ground floor	$0.25
3.	Plus fee per sq. ft. – Upper floors	$0.10
B.	Commercial pad within a previously approved site plan that was not originally reviewed for the proposed specific use or structure	$4,070.00
C.	Land-extensive uses such as a golf course	$4,907.00
D.	Unoccupied commercial and utility structures	$2,260.00
35.	**Subdivisions – Preliminary**	
A.	10 – 22 lots	$13,188.00
B.	23+ lots	
1.	Base fee (for first 23 lots)	$13,188.00
2.	Plus fee per lot (each lot more than 23)	$328.00
C.	In conjunction with a planned development	one-half regular fee
36.	**Subdivisions – Final Plat Check**	$6,641.00
37.	**Tree Plan Review**	
A.	Levels 1, 2, 4, 5	$419.00
B.	Levels 3, 6, 7	$140.00
C.	Tree Canopy/Cool Surfaces deficit	$3.00 per square foot
38.	**Variance (full fee for one variance; one-half cost for second; $0.00 for third or more)**	
A.	Type I	
1.	Six or fewer dwelling units	$874.00
2.	All other	$912.00
B.	Type II	
1.	Six or fewer dwelling units	$2,756.00
2.	All other	$6,639.00
39.	**Zoning Certificates**	$951.00
40.	**Zoning Verification Letter (authorizes replacement of destroyed structure)**	$290.00

Section	Activity	2026 Fees
41.	**Zoning Map Change (not involving comprehensive plan amendment)**	
A.	Proposals 2.5 acres or less in size	$5,000.00
B.	Proposals greater than 2.5 acres and up to 10 acres in size	$7,500.00
C.	Proposals greater than 10 acres in size	$10,000.00
42.	**Zoning or Comprehensive Plan Text Change**	$5,000.00

[1] Projects with approved master plans, which include preliminary stormwater and transportation plans, shall be entitled to a 30 percent reduction in the fee for stormwater and transportation plan review.

20.190.070 Development Engineering Fees.

Fees for development engineering. Fees for development engineering related applications, permits, and services are set forth in Table 20.190.070:

TABLE 20.190.070. DEVELOPMENT ENGINEERING FEES

Section	Engineering Activity	2026 Fees
1.	**Binding Site Plan** (in addition to underlying site plan review fee)	See short plat or subdivision
A.	Conceptual – Requiring subsequent site plan review	
1.	Same as comparable short plat or subdivision	See short plat or subdivision
B.	Detailed – Not requiring subsequent site plan review	
1.	Same as comparable short plat or subdivision	See short plat or subdivision
2.	Plus same as comparable site plan review	See site plan review
2.	**Conditional Use Permit**	
A.	Stormwater plan review	$1,278.00
B.	Transportation plan review	$1,719.00
3.	**Continuance of Public Hearing (applicant-initiated)**	$731.00
4.	**Drainage Projects (special)**	
A.	Plan review fee	$649.00
B.	Construction inspection fee	$665.00
C.	Fees resulting from working without a permit	2 × regular fee
5.	**Escrow Review and Administration**	
A.	$0.00 to $10,000 (final city-approved escrow amount)	
1.	Base fee	$433.00
2.	Plus percentage of final city-approved escrow amount	1.50%
B.	$10,001 to $100,000 (final city-approved escrow amount)	
1.	Base fee	$869.00
2.	Plus percentage of final city-approved escrow amount	1.00%
C.	Greater than $100,000 (final city-approved escrow amount)	

Section	Engineering Activity	2026 Fees
1.	Base fee	$1,735.00
2.	Plus percentage of final city-approved escrow amount	1.00%
6.	**Inspection Fees – Additional**	
A.	Construction inspection after normal work hours[1]	Cost recovery
B.	Construction reinspection during normal work hours	Cost recovery[2]
7.	**Plan Review, Final Engineering – Additional**	
A.	Each additional review (beyond three) for either stormwater or transportation	$673.00
8.	**Post-Decision Review – Specifications**	
A.	Change specifications prior to submittal	No fee
B.	Change specifications after first review	One-half regular fee
C.	Change specifications after final approval	Full regular fee
9.	**Residential (six or fewer dwelling units)**	
A.	Stormwater review	
1.	Residential Stormwater fee	$300
2.	Engineering required	See Section 4 Drainage Projects (special) fee
B.	Transportation review	
1.	Residential Transportation fee	$181.00
2.	Engineering required	$2,042.00
10.	**Right-of-Way Permits**	
A.	City of Vancouver	
	Residential	
1.	Base fee	$37.00
2.	Plus fee per square foot of sidewalk (after the first 100)	$0.05
3.	Plus fee per lineal foot of driveway (after the first 10)	$0.28
	Commercial	
1.	Base fee	$173.00
2.	Plus fee per lineal foot of improvement (includes all frontage improvements and trenching in right-of-way)	$3.11
B.	Clark County	Amount per Clark County Code (CCC) Chapter 13.12A as amended
C.	WSDOT	$386.00
11.	**Site Plans**	
A.	Stormwater plan review (includes preliminary and final)[3]	
1.	General case	
a.	Base fee	$1,925.00

Section	Engineering Activity	2026 Fees
	Plus charge per square foot of impervious area as follows (including roof area):	
b.	First 1.00 acre	$0.04
c.	Next one to five acres	$0.02
d.	Over five acres	$0.004
2.	Unoccupied commercial and utility structures	$624.00
3.	Tenant improvements	$131.00
B.	Transportation plan review (includes preliminary and final)[3]	
1.	General case	$4,918.00
2.	Unoccupied commercial and utility structures	$2,042.00
3.	Tenant improvements	$181.00
C.	Construction inspection fees (stormwater and transportation)	
1.	Small projects (less than one acre of impervious surface)	
a.	Base fee	$1,234.00
b.	Plus charge per square foot of impervious surface	$0.01
2.	Medium projects (1.0 to 4.99 acres of impervious surface)	
a.	Base fee	$2,464.00
b.	Plus charge per square foot of impervious surface	$0.006
3.	Large projects(over five acres of impervious surface) – $10,000 maximum	
a.	Base fee	$4,927.00
b.	Plus charge per square foot of impervious surface	$0.002
4.	Unoccupied commercial and utility structures	$412.00
5.	Tenant improvements	$131.00
12.	**Short Subdivision/Unit Lot Subdivision**	
A.	Plan review fee (includes preliminary and final)	
1.	Stormwater	$1,924.00
2.	Transportation	$2,674.00
B.	Construction inspection fee	
1.	Stormwater	$1,679.00
2.	Transportation	$1,679.00
14.	**Subdivision**	
A.	Plan review fees	
1.	Stormwater	
a.	Base fee	$1,735.00
b.	Plus per-lot fee	
	1. Less than 23 lots	$73.00
	2. 23 or more lots	$67.00
2.	Transportation	

Section	Engineering Activity	2026 Fees
a.	Base fee	$3,852.00
b.	Plus per-lot fee	$93.00
B.	Construction inspection fees	
1.	Stormwater	
a.	Base fee	$1,141.00
b.	Plus per-lot fee	$112.00
2.	Transportation	
a.	Base fee	$3,601.00
b.	Plus per-lot fee	$33.00
15.	**Street Modification – Transportation**	
A.	Prior to public hearing or administrative decision	
1.	Administrative modification	$242.00
2.	Technical (minor) modification	$1,764.00
3.	Design (major) modification	$3,504.00
B.	After public hearing or administrative decision	
1.	Administrative modification	$242.00
2.	Technical (minor) modification	$2,215.00
3.	Design (major) modification	$3,965.00
C.	Appeal to hearing examiner	$1,764.00
16.	**Traffic Signal Plan Review and Inspection**	
A.	Plan review fee	$5,778.00
B.	Civil construction inspection fee	$3,470.00
17.	**Transportation Concurrency Review**	
A.	Concurrency certificate request evaluation (preliminary scoping)	$242.00
B.	Traffic study review	$481.00
C.	Model maintenance fee per trip (peak hour); $1,500 maximum	$73.00
18.	**Variance (all cases)**	
A.	Stormwater	$964.00
B.	Transportation	$1,335.00
19.	**Right-of-Way Use Permit Fees**	
A.	Type A application fee short-term permit	$40.00
B.	Type B encroachment permit fee	$40.00
C.	Type C use fee temporary use and occupation permit	$40.00
D.	Type D long-term ROW use and occupation permit	$719.00
E.	Type E material encroachment permit	$2,879.00

20.190.080 Fire Review Fees.

Fees payable for fire review. Fees for reviewing and inspecting land development applications and building plans for compliance with the requirements of the International Fire Code are set forth in Table 20.190.080. Fire Review Fees:

TABLE 20.190.080. FIRE REVIEW FEES

Section	Engineering Activity	2026 Fees
1.	**Planning and Development Review**	
A.	Residential (six or less units)	35% of the building permit fee
B.	Site plan review	
1.	Type I	$398.00
2.	Type II	$1,108.00
3.	All other site plan reviews (e.g., post-decision review)	$398.00
C.	Land divisions	
1.	Short subdivision (9 lots or less)	$1,108.00
2.	Subdivision (10 lots or more)	
a.	Base fee for first 23 lots	$1,666.00
b.	Plus fee per lot over 23	$64.00
D.	Fire official review	$308.00
E.	All other land use applications	$278.00

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CHAPTER 20.195
NONCONFORMING SITUATIONS

Sections:

20.195.010 Purpose.

20.195.020 Applicability.

20.195.030 Nonconforming Situations.

20.195.040 Repair and Maintenance.

20.195.010 Purpose.

This chapter allows legally established nonconforming lots, structures, and uses to continue, be maintained, and in some cases be expanded, while ensuring that full compliance with Title 20 is achieved when a site is fully redeveloped.

20.195.020 Applicability.

All nonconforming lots, structures, and uses are regulated by this chapter. Once a nonconforming situation is brought into compliance with current standards, it becomes conforming. Nothing in this chapter modifies the obligation to comply with building, fire, health, or safety codes.

20.195.030 Nonconforming Situations.

A. Nonconforming Lots

A legal nonconforming lot may be developed with uses permitted in its zone, subject to Title 20 standards. Any standard that cannot be met due to lot size or dimensions may be considered for a Type I variance.

B. Nonconforming Structures

1. A legally-established nonconforming structure may continue and may be altered or expanded if the alteration does not increase its nonconformity.
2. If a nonconforming structure is damaged by a catastrophic event, it may be rebuilt within its original footprint if an application is filed within one year of the damage.
3. Demolishing one-hundred (100%) percent or more of the structure's floor area constitutes full redevelopment; any further development must fully comply with Title 20.
4. Expansion that increases the area of nonconforming use must comply with subsection (C)(4).

C. Nonconforming Uses

1. Nonconforming use status is not affected by changes in ownership.
2. Changing to a conforming or conditional use shall extinguish all previous nonconforming rights.
3. A nonconforming use is lost if discontinued or abandoned for more than one year, measured from the earliest of:
    a. vacancy of the premises,
    b. cessation of business activity, or
    c. termination of the lease or occupancy contract.
4. Expansion of structures containing nonconforming uses is permitted as follows:
    a. Less than fifty (50%) percent cumulative floor area: allowed with site plan review if ordinarily required or building permit if not ordinarily required; no increase in outdoor storage or processing allowed.
    b. Fifty (50%) percent or more cumulative floor containing a nonconforming use is permitted as follows: allowed with site plan review if ordinarily required or building permit if not ordinarily required, plus approval of a Type I Nonconforming Use Expansion application which demonstrates that any identified impacts to neighboring properties will be appropriately mitigated.
5. The regulations in this chapter apply to all nonconforming uses. A property owner who disputes a nonconforming use finding may request a Planning Official Determination (Type I), which shall be appealable to the City Hearing Examiner.
6. The applicant must show:
    a. The use, as defined by Chapter 20.160 VMC, Use Classifications was lawful when established, supported by permits, zoning provisions, or documentation showing establishment before adoption of the first development code; and
    b. The use has been continuously maintained, demonstrated by annual documentation (e.g., receipts, utility bills, tax records, assessor data, dated photographs). Affidavits may supplement but not replace primary evidence.

20.195.040 Repair and Maintenance.

Routine repairs and maintenance are permitted. Any changes to a structure required by the Building Official or Fire Marshal are permitted as repair and maintenance.

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20.200
LAND USE DECISIONS

Sections

20.210 Decision Making Procedures.

20.220 Review Bodies.

20.225 Summary of Land Use Permits.

20.230 Annexations.

20.245 Conditional Use Permits.

20.250 Development Agreements.

20.255 Interpretations and Minor Adjustments.

20.260 Master Plans.

20.265 Design Review.

20.270 Public Facilities Master Plans.

20.280 Site Plan Review.

20.285 Text and Map Amendments.

20.290 Variances.

CHAPTER 20.210
DECISION MAKING PROCEDURES

Sections:

20.210.010 Purpose and Applicability.
20.210.020 Types of Development Applications.
20.210.030 Exempt Activities.
20.210.040 Type I Applications.
20.210.050 Type II Applications.
20.210.060 Type III Applications.
20.210.070 Type IV Applications.
20.210.080 Pre-application Conference.
20.210.090 Review For Counter-Complete Status.
20.210.100 Review For Fully Complete Status.
20.210.110 Vesting of Applications.
20.210.120 Public Hearing Procedures.
20.210.130 Appeals.
20.210.140 Post Decision Review.

20.210.010 Purpose and Applicability.

A. *Purpose.* The purpose of this chapter is to establish standardized decision-making procedures for reviewing development applications within the City of Vancouver enabling the city, the applicant, and all interested parties to reasonably review applications, and participate in the local decision-making process in a timely and effective way. More specifically, this chapter is intended to:

1. Assure prompt review of development applications through the application of clear and specific standards;

2. Provide for public review and comment on development applications that may have an impact on the community;

3. Establish procedures to ensure that the development application, if approved, is consistent with applicable standards; and

4. Ensure adverse impacts on surrounding land uses are minimized, while encouraging flexibility and innovation in the design and layout of site improvements and buildings.

B. *Applicability.* The provisions of this chapter apply to all development applications that are subject to review under the following chapters of the Vancouver Municipal Code except as otherwise exempt under Section 20.210.030 VMC.

C. *Consistency with applicable codes.* Where applicable, this chapter is intended to establish the procedures for determining whether development applications are, or can be approved or conditionally approved to be consistent with applicable codes, policies, and standards.

20.210.020 Types of Development Applications.

A. *General.* All development applications shall be decided by using one of the following procedure types. The procedure type assigned to each action governs the decision-making procedure for that application, except to the extent otherwise required by applicable state or federal law.

B. *Types defined.* There are four types of decision-making procedures, as follows:

1. *Type I procedure.* Type I procedures apply to ministerial permits. Type I applications are decided by the Planning Official without public notice prior to the decision and without a public hearing. If any party with standing appeals a Planning Official's Type I decision, the appeal of such decision will be heard by the Hearing Examiner, with further appeal to the superior court pursuant to applicable law.

2. *Type II procedure.* Type II procedures apply to quasi-judicial permits and actions that contain some discretionary criteria. Type II applications are decided by the Planning Official with public notice and an opportunity for comment. If any party with standing appeals a Planning Official's Type II decision, the appeal of such decision will be heard by the Hearing Examiner, with further appeal to the superior court pursuant to Section 20.210.130 VMC.

3. *Type III procedure.* Type III procedures apply to quasi-judicial permits and actions that predominantly contain discretionary approval criteria. Type III applications are decided by the Hearing Examiner or planning commission, depending on the permit. If any party with standing appeals a Hearing Examiner's or planning commission's Type III decision, the appeal of such decision will be heard by city council pursuant to Section 20.210.130 VMC, with further appeal to superior court.

4. *Type IV procedure.* Type IV procedures apply to legislative matters, and rezones. Legislative matters involve the creation, revision or large-scale implementation of public policy. Type IV applications are considered initially by the planning commission or Hearing Examiner with final decisions made by the city council, automatically or on appeal.

C. *Summary of permits by type of decision-making procedure.* Table 20.210.020-1 summarizes the various development applications by the type of decision-making procedure.

TABLE 20.210.020-1. SUMMARY OF DEVELOPMENT APPLICATIONS BY TYPE OF DECISION-MAKING PROCEDURE

Type	Development Application	Cross Reference	Review Body
I	Administrative Lot Split	20.320	Planning Official
	Boundary Adjustments	20.310	Planning Official
	Conditional Use – Minor Modification	20.245	Planning Official
	Critical Areas Permit (Type I)	20.720.040	Planning Official
	Design Review (without Site Plan Review)	20.265	Planning Official
	Historic Property Certificate of Appropriateness/Administrative Review	17.39.080	Planning Official
	Interpretations – Quasi-Judicial	20.255	Planning Official
	Nonconforming Use Expansion	20.195	Planning Official
	Parking/Loading – Reduction of Minimum Ratios, Joint Parking	20.450	Planning Official
	Site Plan Review – Minor Projects Below Type II Site Plan Review Thresholds	20.280	Planning Official
	Site Plan Review – Extension/Phasing	20.280	Planning Official
	Shoreline Permit Exemption	20.730	Planning Official

Type	Development Application	Cross Reference	Review Body
	Subdivision/Short Subdivision – Phasing, 1st Extension	20.320	Planning Official
	Temporary Use	20.430	Planning Official
	Tree Plan/Removal – without Site Plan Review	20.450	Planning Official
	Type I Variance	20.290	Planning Official
II	Adult Entertainment Uses	20.450	Planning Official
	Critical Areas Permit (Type II)	20.720	Planning Official
	Critical Areas Permit – Minor Exception	20.720.070	Planning Official
	Master Planning – less than 25 acres in size	20.260	Planning Official
	Public Facility Master Plans – Concept Plan Subsequent Phases & Extensions	20.270	Planning Official
	Shoreline Substantial Development Permit	20.730	Planning Official
	Short Subdivision/Unit Lot Subdivision – Preliminary Plat	20.320	Planning Official
	Site Plan Review	20.280	Planning Official
	Subdivision – 2nd Extension	20.320	Planning Official
	Type II Variance	20.290	Planning Official
III	Conditional Uses – Initial, Major Modifications	20.245	Hearing Examiner
	Critical Areas Permit – Reasonable Use Exception	20.720.080	Hearing Examiner

Type	Development Application	Cross Reference	Review Body
	Historic District Nomination	17.39.070	Clark County Historic Preservation Commission
	Historic District or Property Designation Removal	17.39.070	Clark County Historic Preservation Commission
	Historic Register Nomination	17.39.070	Clark County Historic Preservation Commission
	Historic Property Certificate of Appropriateness Public Review	17.39.080	Clark County Historic Preservation Commission
	Public Facility Master Plans – Initial Approval	20.270	Hearing Examiner
	Shoreline Conditional Use Permit (recommendation to State Department of Ecology)	20.730	Hearing Examiner
	Shoreline Substantial Development Permit	20.730	Hearing Examiner
	Shoreline Variance (recommendation to State Department of Ecology)	20.730	Hearing Examiner
	Subdivisions – Preliminary Plat	20.320	Hearing Examiner
IV	Annexations	20.230	Planning Commission City Council
	Development Agreements	20.250	Planning Commission, if Agreement is part of proposal before the Commission City Council
	Master Planning – 25 acres or greater	20.260	Planning Commission, City Council

Type	Development Application	Cross Reference	Review Body
	Comprehensive Plan or Zoning Text/Map Amendment	20.285	Planning Commission, except review of Chapter 20.190 VMC, Fees City Council
	Zoning Map Amendments	20.285	Planning Commission, except Hearing Examiner review in cases of standalone zone changes from one single or multifamily residential designation to the next most or least dense that also involve a concurrent subdivision proposal City Council

D. *Concurrent review.* When the city must approve more than one application for a given development, all applications required for the development pursuant to this chapter may be submitted for review at one time. When more than one application is submitted for a given development, and those applications are subject to different types of procedure, then all of the applications are subject to the highest type of procedure that applies to any of the applications; provided, however that each development application shall only be subject to the relevant criteria applicable to that particular development application. For example, a development proposal that includes a Type II application and a Type III application shall be wholly subject to the procedures applicable to a Type III application, but the Type II portion of the development proposal shall be decided according to the relevant approval criteria applicable to the Type II application.

E. *Assignment of procedure type.* Applications shall be processed according to the assigned review type in the above table. If the Vancouver Municipal Code does not expressly provide for review using one of the four types of decision-making procedures, and another specific procedure is not required by law, the Planning Official shall classify the application in question as one of the four types of decision-making procedure using the following criteria:

1. The act of classifying an application shall be a Type I decision;

2. Questions about what procedure is appropriate shall be resolved in favor of the decision-making procedure providing the greatest opportunity for public notice; and

3. The Planning Official shall classify the application by determining whether the application is similar in nature and degree to another type of application that has been classified by type as listed in Table 20.210.020-1 and under the same approval criteria applicable to the type of application most similar in nature and degree to the application.

F. *Comprehensive Plan Amendments.* New development applications or pre-applications which are inconsistent with the comprehensive plan shall not be accepted by the city, until the planning commission recommends approval of a comprehensive plan amendment or in the event that planning commission recommends denial, until the effective date of final action by the city council approving the comprehensive plan amendment on appeal.

20.210.030 Exempt Activities.

A. *Exemptions.* Unless specified elsewhere in this title, the following development activities are exempt from the procedural requirements of this chapter:

1. Landscaping or landscape alterations, unless such landscaping or alterations would require a permit or approval pursuant to this title or modify or violate an approved plan, plat or a condition of approval of a prior permit. In such instance of modification, the permit shall be processed as a modification of the prior permit under VMC 20.210.140, a plat alteration or other applicable procedure.

2. Normal or emergency repair or maintenance of public or private buildings, structures, landscaping or utilities.

3. A change of any legally-established use except if the change of use requires an increase in the number of parking spaces provided, requires a conditional use permit under Chapter 20.245 VMC, requires Type I or Type II site plan approval under Chapter 20.280 VMC, Site Plan Review, or is otherwise classified in this title as a Type I, II, III or IV action.

4. Building permits required pursuant to the city-adopted building code for construction not requiring a development application under VMC Title 20.

5. On-site utility permits not obtained in conjunction with a specific development application, including but not limited to sewer hook-ups, water hook-ups, right-of-way permits, grading permits, and fire department permits.

6. Home occupation permits.

7. Sign permits.

8. Approval of escrow agreements/accounts.

9. All developments and buildings that are engaged in agriculture as defined in Chapter 20.160 VMC, Use Classifications.
10. Interior remodeling and tenant improvements unless site plan review is triggered under VMC 20.280.020(C) or (D).
11. Independent archaeological predeterminations or surveys not associated with a development application.
12. Short-term rental permits.
13. Middle housing developments, 6 or fewer dwelling units on a parent parcel.

B. *Other regulations apply.* Exemptions in subsection A of this section are subject to all other applicable standards and requirements of the Vancouver Municipal Code.

20.210.040 Type I Applications.

A. *Pre-application conference.* A pre-application conference is required for any Type I application that includes 7 or more dwelling units or involves land which contains a Critical Area or Buffer, as defined by 20.720 VMC, unless waived pursuant to Section 20.210.080(B) VMC prior to submittal of an application. A pre-application conference is not required for any other Type I application.

B. *Application requirements.*

1. *Application forms.* Type I applications shall be made on forms provided by the Planning Official.
2. *Submittal information.* Type I applications shall:
    a. Include the information set forth in the chapter of this title governing the permit requested; and
    b. Address the relevant criteria applicable to the permit requested in sufficient detail for review and action; and
    c. Be accompanied by the required fees.

C. *Posting/Public Notice for Site Plan Applications only*.

1. *Sign*. The applicant must post at least one sign on the proposed development site at least 35 days, but not more than one year, before applying for a land use review or building permit. Sites with no street frontage are not subject to this requirement.
    a. A sign must be placed on each street frontage of the site. If the street frontage is over 600 feet long, a sign is required for each 600 feet or fraction thereof. Signs must be posted within 10 feet of a street lot line and must be visible. Signs may not be posted in a public right-of-way. Signs are not required along street frontages that are not improved and do not allow motor vehicle access.

b. The required signs must remain on the site until the land use appeal period is complete or one year has passed since the application that triggers the sign requirement was submitted, whichever is less.

c. The Planning Official has the authority to adopt administrative rules to determine the size and layout of the sign.

d. A photograph of the required signs posted on the site must be submitted as part of the application for a land use review or building permit.

e. The signs must contain the following information:

i. The name, telephone number and email address of the applicant;

ii. The name and email address of the neighborhood association that includes the site;

iii. The name, telephone number and email address of any recognized neighborhood that includes the site;

iv. A written summary of the proposed development;

v. A site plan that includes the proposed development; and

vi. Procedural information provided by Vancouver Community Development Department

2. *Neighborhood notification*. The applicant must send a letter or email to any city recognized neighborhood association whose boundaries include the site. The email or letter must be sent at least 35 days, but not more than one year, before applying for a land use review or building permit. A copy of the email or letter, and a list of the email or postal addresses to which the email or letter was sent, must be submitted as part of the application for a land use review or building permit. The email or letter must contain the following information:

a. The name, telephone number and email address of the applicant;

b. The address of the site of the proposed development;

c. A summary of the proposed development; and

d. A site plan that includes the proposed development.

3. *Required information*.

a. The applicant must contact Vancouver Community Development Department via email, or an online information submittal tool, at least 35 days, but not more than one year, before applying for a land use review or building permit. The email, or online submittal, must contain the following information:

i. The name, telephone number, and email address of the applicant;

ii. The address of the site of the proposed development;

iii. A summary of the proposed development; and

iv. A site plan that includes the proposed development.

b. The following information must be submitted as part of the application for a land use review or building permit:

i. A copy of the email or letter that was sent as required by Paragraph C.2.;

ii. A list of the email or postal addresses to which the email or letter required by Paragraph C.2. was sent;

iii. A photograph of the sign required by Paragraph C.1. posted on the site;

iv. A signed statement certifying that the required email or letter was sent, and the required signs were posted, at least 35 days, but not more than one year, before applying for a land use review or building permit

D. *Counter-complete determination.* At the time of application submittal, the city shall make a determination of counter-complete status pursuant to Section 20.210.090 VMC.

E. *Fully-complete determination.* No later than 21 calendar days after receipt of a counter-complete Type I application, the Planning Official shall notify the applicant as to the completeness of the application. The city shall make a determination of fully-complete status pursuant to Section 20.210.100 VMC. An application shall not be deemed fully complete until all information required by the code applicable to the permit sought is submitted.

F. *Review by Planning Official.* Unless accompanied with a SEPA checklist review the Planning Official shall approve, approve with conditions, or deny a Type I application within 28 calendar days after the date the application was accepted as fully complete; provided, that an applicant may agree in writing to extend the time in which the Planning Official shall issue a decision. Qualifying Planned Actions and other projects which involve a SEPA Review shall be reviewed within 60 days of a fully complete determination. Time spent by the applicant to revise plans or provide additional studies or materials requested by the city shall not be included in the maximum permitted review period. The Planning Official may consider new evidence the applicant introduces with or after such a written request for extension. The Planning Official's decision shall address all of the relevant approval criteria applicable to the development application.

G. *Final Decision.* The final decision on a Type I application shall be mailed to the applicant, the property owner, and the applicant's representative by regular mail. The final decision on a Type I application shall contain the following information:

1. A statement of the applicable criteria and standards pursuant to the Vancouver Municipal Code and other applicable law;

2. A statement of the facts demonstrating how the application does or does not comply with applicable approval criteria;
3. The reasons for a conclusion to approve, approve with conditions or deny the application;
4. The decision to approve or deny the application and, if approved, conditions of approval necessary to ensure the proposed development will comply with applicable law; and
5. The date the final decision is signed and the date the appeal period expires.

H. *Appeal of Final Decision.* A Type I decision becomes effective on the day after the appeal period expires unless an appeal is filed, in which case the procedures of Section 20.210.130 VMC shall apply. The applicant and owner have the right to waive their appeal rights, and in such cases where a waiver is submitted in writing to the Planning Official, the Type I decision is considered final on the day it is signed by the Planning Official or on the day the waiver is approved, whichever is later.

20.210.050 Type II Applications.

A. *Pre-application conference.* A pre-application conference is required for all Type II applications, unless waived under Section 20.210.080(B) VMC before a Type II application is submitted. Pre-application conference requirements and procedures are set forth in Section 20.210.080 VMC.

B. *Application requirements*.

1. *Application forms.* Type II applications shall be made on forms provided by the Planning Official.
2. *Submittal information.* Type II applications shall:
   a. Include the information set forth in the chapter of this title governing the permit requested;
   b. Address the relevant criteria applicable to the permit requested in sufficient detail for review and action; and
   c. Be accompanied by the required fees.

C. *Posting/Public Notice*.

1. Sign. The applicant must post at least one sign on the proposed development site at least 35 days, but not more than one year, before applying for a land use review or building permit. Sites with no street frontage are not subject to this requirement.
   a. A sign must be placed on each street frontage of the site. If the street frontage is over 600 feet long, a sign is required for each 600 feet or fraction thereof. Signs must be posted within 10 feet of a street lot line and must be visible. Signs may not be posted in a public right-of-way. Signs are not required along street frontages that are not improved and do not allow motor vehicle access.

b. The required signs must remain on the site until the land use appeal period is complete or one year has passed since the application that triggers the sign requirement was submitted, whichever is less.

c. The Planning Official has the authority to adopt administrative rules to determine the size and layout of the sign.

d. A photograph of the required signs posted on the site must be submitted as part of the application for a land use review or building permit.

e. The signs must contain the following information:

i. The name, telephone number and email address of the applicant;

ii. The name and email address of the neighborhood association that includes the site;

iii. The name, telephone number and email address of any recognized neighborhood that includes the site;

iv. A written summary of the proposed development;

v. A site plan that includes the proposed development; and

vi. Procedural information provided by Vancouver Community Development Department

2. *Neighborhood notification*. The applicant must send a letter or email to any city recognized neighborhood association whose boundaries include the site. The email or letter must be sent at least 35 days, but not more than one year, before applying for a land use review or building permit. A copy of the email or letter, and a list of the email or postal addresses to which the email or letter was sent, must be submitted as part of the application for a land use review or building permit. The email or letter must contain the following information:

a. The name, telephone number and email address of the applicant;

b. The address of the site of the proposed development;

c. A summary of the proposed development; and

d. A site plan that includes the proposed development.

3. Required information.

a. The applicant must contact Vancouver Community Development Department via email, or an online information submittal tool, at least 35 days, but not more than one year, before applying for a land use review or building permit. The email, or online submittal, must contain the following information:

i. The name, telephone number, and email address of the applicant;

ii. The address of the site of the proposed development;

iii. A summary of the proposed development; and

iv. A site plan that includes the proposed development.

b. The following information must be submitted as part of the application for a land use review or building permit:

i. A copy of the email or letter that was sent as required by Paragraph C.2.;

ii. A list of the email or postal addresses to which the email or letter required by Paragraph C.2.was sent;

iii. A photograph of the sign required by Paragraph C.1. posted on the site;

iv. A signed statement certifying that the required email or letter was sent, and the required signs were posted, at least 35 days, but not more than one year, before applying for a land use review or building permit

D. *Counter-complete determination.* At the time of application submittal, the city shall make a determination of counter-complete status pursuant to Section 20.210.090 VMC.

E. *Fully complete determination.* No later than 28 calendar days after receipt of a counter-complete Type II application, the Planning Official shall notify the applicant as to the completeness of the application. Determination of fully complete status shall be pursuant to Section 20.210.100 VMC. An application shall not be deemed fully complete until all information listed in the code applicable to the action requested and/or in the pre-application conference summary is submitted.

F. *Notice of Application.* Within 14 calendar days after the date a Type II application is determined fully complete, the Planning Official shall issue a notice of application which shall include all of the following:

1. The case file number(s), the date of application, and the date a fully complete application was filed;

2. A description of the proposed project, and a list of project permits included with the application, as well as the identification of other permits not included in the application, to the extent known to the city;

3. The proposed SEPA threshold determination, if the optional SEPA process is used; whether the application is categorically exempt from SEPA, the deadline for submitting comments or appeals under Chapter 20.740 VMC, if applicable, or other matters covered by SEPA;

4. The identification of any existing environmental documents that may be used to evaluate the proposed project;

5. A statement of the public comment period, a statement that the public has the right to comment on the application, receive notice of the decision, request a copy of the decision once made, and a notice of any appeal rights;
6. An indication that failure of any party to address the relevant approval criteria with sufficient specificity may preclude subsequent appeals on that issue. Comments directed at the relevant approval criteria are what constitute relevant evidence;
7. An indication that all evidence relied upon by the Planning Official to make the decision shall be contained within the record and is available for public review. Copies of this evidence can be obtained at a reasonable cost from the Planning Official;
8. The name of the applicant or applicant's representative and the name, address, and telephone number of a contact person for the applicant, if any;
9. A description of the site, including current zoning and nearest road intersections, sufficient to inform the reader of its location and zoning;
10. A map showing the subject property in relation to other properties or a reduced copy of the site plan;
11. The date, place, and times where information about the application may be examined and the name and telephone number of the city representative to contact about the application;
12. An indication that after the comment period closes, the Planning Official shall issue a Type II notice of decision; and
13. Any additional information determined appropriate by the Planning Official.

G. *Distribution of Notice of Application.* The notice of application shall be published in a newspaper of local circulation and sent to the following persons by mail:

1. The applicant and all owners of the site which is the subject of the application;
2. All owners and residents of record of property as shown on the most recent property tax assessment roll, located within 300 feet of the site;
3. Any city recognized neighborhood association whose boundaries include the site;
4. City-recognized neighborhood associations adjacent to the city-recognized neighborhood association whose boundaries include the site;
5. Any governmental agency which is entitled to notice under an intergovernmental agreement entered into with the city which includes provision for such notice or which is otherwise entitled to such notice;
6. Any person who requested, in writing, to receive a copy of the notice of application.

H. *Comment period.* The Planning Official shall allow 14 calendar days from a fully complete determination to submit comments. Within seven calendar days after the close of the public comment period, the Planning Official shall mail to the applicant a copy of written comments, including email communications, timely received in response to the notice of application together with a statement that the applicant may submit a written response to the comments of the Planning Official within 14 calendar days from the date the comments are mailed. The Planning Official in making his decision shall consider written comments timely received in response to the notice of application and timely written responses to those comments, including e-mail communications, submitted by the applicant.

I. *Timeline to make Final Decision.* The final decision on a Type II application shall be made and mailed pursuant to subsection I of this section not more than 100 calendar days (90 days for short subdivisions) after the date a fully complete determination is made. This period shall not include:

1. Time spent by the applicant to revise plans or provide additional studies or materials requested by the city.
2. Time spent preparing an environmental impact statement.
3. Time between submittal and resolution of an appeal.
4. Any extension of time mutually agreed upon by the applicant and the city in writing.

J. *Final Decision.* The final decision on a Type II application shall contain the following information:

1. The nature of the application in sufficient detail to apprise persons entitled to notice of the applicant's proposal and of the decision;
2. The address or other geographic description of the subject property, including a map of the site in relation to the surrounding area, where applicable;
3. The date the Planning Official's decision shall become final, unless appealed;
4. A statement that all persons entitled to notice or who have standing under VMC may appeal the decision; Section 20.210.130(B)(2) may appeal the decision;
5. A statement in boldface type briefly explaining how an appeal can be filed, the deadline for filing such an appeal, and where further information can be obtained concerning the appeal;
6. A statement that the complete case file, including findings, conclusions and conditions of approval, if any, is available for review. The notice shall list the place, days and times where the case file is available and the name and telephone number of the city representative to contact about reviewing the case file;
7. A statement of the applicable criteria and standards pursuant to the Vancouver Municipal Code and other applicable law;

8. A statement of the facts demonstrating how the application does or does not comply with applicable approval criteria;
9. The reasons for a conclusion to approve, approve with conditions or deny the application;
10. The decision to approve or deny the application and, if approved, conditions of approval necessary to ensure the proposed development will comply with applicable law;
11. The date the final decision is mailed; and

K. *Distribution of the Final Decision.* The final decision shall indicate the date the final decision was mailed and demonstrate that the required final decision was mailed to the necessary parties in a timely manner. A final decision shall be sent by mail to:

1. The applicant and all owners of the site which is the subject of the application;
2. Any city recognized neighborhood association whose boundaries include the boundaries of the project site;
3. City-recognized neighborhood associations adjacent to the city-recognized neighborhood association whose boundaries include the site; and
4. Any person who requested, in writing, to receive a copy of the final decision of the Planning Official.

L. *Notice of Decision.* A notice of decision shall include the information contained in subsections (I)(1) through (I)(6), (I)(10) and (I)(11) of this section.

M. *Distribution of Notice of Decision.* The Planning Official shall provide an affidavit of mailing of the notice of decision as part of the file. The notice of decision shall indicate the date the notice was mailed and demonstrate that the required notice was mailed to the necessary parties in a timely manner. A notice of decision shall be sent on the same day as the final decision by mail to:

1. Any governmental agency which is entitled to notice under an intergovernmental agreement entered into with the city which includes provision for such notice or who is otherwise entitled to such notice;
2. Any person who provided written comments on the application during the public comment period and provided a mailing address.

N. *Final Decision and effective date.* A Type II decision is subject to the required appeal period when the final decision and the notice of decision are mailed. A Type II decision becomes effective on the day after the appeal period expires, unless an appeal is filed, in which case the procedures of Section 20.210.130 VMC shall apply.

20.210.060 Type III Applications.

A. *Pre-application conference.* A pre-application conference is required for all Type III applications, unless waived under Section 20.210.080(B) VMC before a Type III application is submitted. Pre-application conference requirements and procedures are set forth in Section 20.210.080 VMC.

B. Application requirements.

1. *Application forms.* Type III applications shall be made on forms provided by the Planning Official.

2. *Required submittals.* Type III applications shall:

a. Include the information set forth in the chapter of this title governing the action requested;

b. Address the relevant criteria applicable to the action requested in sufficient detail for review and action; and

c. Be accompanied by the required fees.

C. *Posting/Public Notice.*

1. Sign. The applicant must post at least one sign on the proposed development site at least 35 days, but not more than one year, before applying for a land use review or building permit. Sites with no street frontage are not subject to this requirement.

a. A sign must be placed on each street frontage of the site. If the street frontage is over 600 feet long, a sign is required for each 600 feet or fraction thereof. Signs must be posted within 10 feet of a street lot line and must be visible. Signs may not be posted in a public right-of-way. Signs are not required along street frontages that are not improved and do not allow motor vehicle access.

b. The required signs must remain on the site until the land use appeal period is complete or one year has passed since the application that triggers the sign requirement was submitted, whichever is less.

c. The Planning Official has the authority to adopt administrative rules to determine the size and layout of the sign.

d. A photograph of the required signs posted on the site must be submitted as part of the application for a land use review or building permit.

e. The signs must contain the following information:

i. The name, telephone number and email address of the applicant;

ii. The name and email address of the neighborhood association that includes the site;

iii. The name, telephone number and email address of any recognized neighborhood that includes the site;

iv. A written summary of the proposed development;

v. A site plan that includes the proposed development; and

vi. Procedural information provided by Vancouver Community Development Department

2. *Neighborhood notification*. The applicant must send a letter or email to any city recognized neighborhood association whose boundaries include the site. The email or letter must be sent at least 35 days, but not more than one year, before applying for a land use review or building permit. A copy of the email or letter, and a list of the email or postal addresses to which the email or letter was sent, must be submitted as part of the application for a land use review or building permit. The email or letter must contain the following information:

   a. The name, telephone number and email address of the applicant;

   b. The address of the site of the proposed development;

   c. A summary of the proposed development; and

   d. A site plan that includes the proposed development.

3. Required information.

   a. The applicant must contact Vancouver Community Development Department via email, or an online information submittal tool, at least 35 days, but not more than one year, before applying for a land use review or building permit. The email, or online submittal, must contain the following information:

      i. The name, telephone number, and email address of the applicant;

      ii. The address of the site of the proposed development;

      iii. A summary of the proposed development; and

      iv. A site plan that includes the proposed development.

   b. The following information must be submitted as part of the application for a land use review or building permit:

      i. A copy of the email or letter that was sent as required by Paragraph C.2.;

      ii. A list of the email or postal addresses to which the email or letter required by Paragraph C.2.was sent;

      iii. A photograph of the sign required by Paragraph C.1. posted on the site;

      iv. A signed statement certifying that the required email or letter was sent, and the required signs were posted, at least 35 days, but not more than one year, before applying for a land use review or building permit

D. *Counter-complete determination.* Section 20.210.050(C) VMC shall apply to Type III applications.

E. *Fully complete determination.* Section 20.210.050(D) VMC shall apply to Type III applications.

F. *Notice of Application/Hearing.* Within 14 calendar days after the date a Type III application is determined fully complete, the Planning Official shall issue a notice of application to a newspaper of local circulation and to the parties listed in Section 20.210.050(G) VMC which shall include:

1. The case file number(s), the date of application, and the date a fully complete application was filed;
2. A description of the proposed project and a list of project permits included with the application, as well as the identification of other permits not included in the application, to the extent known to the city;
3. The proposed SEPA Threshold Determination, if the Optional SEPA Process is used; whether the application is categorically exempt from SEPA, the deadline for submitting comments or appeals under Chapter 20.740 VMC, if applicable, or other matters covered by SEPA;
4. The identification of any existing environmental documents that may be used to evaluate the proposed project;
5. A statement of the public comment period; a statement that the public has the right to comment on the application, receive notice of and participate in any hearings, and request a copy of the decision once made; and a notice of any appeal rights;
6. The date, time, place, and type of hearing, if established at the time of the notice of application. If the hearing date has not been established at the time of issuance of the notice of application, the notice of hearing procedures of Section 20.210.120(B)(1)and (B)(2) VMC shall apply;
7. A statement that a consolidated staff report and SEPA review will be available for inspection at no cost at least 10 calendar days before the public hearing and the deadline for submitting written comments;
8. The name of the applicant or applicant's representative and the name, address and telephone number of a contact person for the applicant, if any;
9. A description of the site, including current zoning and nearest road intersections, reasonably sufficient to inform the reader of its location and zoning;
10. A map showing the subject property in relation to other properties or a reduced copy of the site plan;
11. The date, place, and times where information about the application may be examined and the name and telephone number of the city representative to contact about the application;
12. The designation of the review authority, and a statement that the hearing will be conducted in accordance with the rules of procedure adopted by the review authority;

13. Any additional information determined appropriate by the Planning Official.

G. *Comment period.* The Planning Official shall allow 30 calendar days after the date of notice of application is mailed and published in the paper for individuals to submit comments. Within seven calendar days after the close of the public comment period, the Planning Official shall mail to the applicant a copy of written comments, including email communications, timely received in response to the notice of application together with a statement that the applicant may submit a written response to the comments of the Planning Official within 14 calendar days from the date the comments are mailed. The Planning Official in making his decision shall consider written comments timely received in response to the notice of application and timely written responses to those comments, including e-mail communications, submitted by the applicant.

H. *Timeline to Make Final Decision.* The final decision on a Type III application shall be made and mailed pursuant to Section 20.210.050(H)(1) VMC not more than 170 calendar days (90 days for subdivisions) after the date a fully complete determination is made. This period shall not include:

1. Time spent by the applicant to revise plans or provide additional studies or materials requested by the city.
2. Time spent preparing an environmental impact statement.
3. Time between submittal and resolution of an appeal.
4. Any extension of time mutually agreed upon by the applicant and the city in writing.

I. *Hearing Procedures and Final Decision*. Section 20.210.120(B)(1)(b) through (B)(1)(d) and (B)(3) through (B)(14) shall govern the hearing procedures and final decision for a Type III application.

J. *Distribution of Final Decision.* Section 20.210.120(B)(11) VMC shall govern distribution of a final decision on a Type III application.

K. *Distribution of Notice of Decision.* Section 20.210.120(B)(13) VMC shall govern distribution of notice of decision on a Type III application.

L. *Appeal.* Section 20.210.130 VMC shall govern an appeal of a final decision on a Type III application.

20.210.070 Type IV Applications.

A. *Purpose and findings.* Type IV applications are legislative land use actions as well as site-specific rezones and planned developments to be reviewed by the Hearing Examiner or Planning Commission and City Council. Specific Type IV applications are subject to the procedures and review criteria set forth in the applicable sections of the code. The full list of Type IV applications is set forth in Section 20.210.020(C) VMC, Table 20.210.-1.

B. *Initiation of Type IV applications.* Type IV applications may be initiated by any of the following if authorized by this code:

1. Property owner(s) or their representatives;
2. Any citizen, agency, neighborhood association or other party; or
3. City staff, Planning Commission or City Council.

C. *Exception from consolidated review.* Type IV applications, except planned developments, shall be considered exempt from 36.70B.120 RCW requirements which mandate consolidation of all related project permits into a single application review if requested by the applicant. Projects involving a Comprehensive Plan amendment and associated change of zone shall not be processed using concurrent review under Section 20.210.020(D).

1. Type IV Map amendments: Refer to Chapter 20.285 VMC.
2. Type IV Text amendments: Refer to Chapter 20.285 VMC.

20.210.080 Pre-application Conference.

A. Purpose.

1. To acquaint city and other agency staff with a sufficient level of detail about the proposed development to enable staff to advise the applicant of applicable approvals and requirements; and
2. To acquaint the applicant with the applicable requirements of the Vancouver Municipal Code and other laws and to identify issues and concerns in advance of a formal application to save the applicant time and expense through the process. However, the conference is not intended to provide an exhaustive review of all the potential issues. The pre-application conference does not prevent the city from applying all relevant laws to the application.
3. To inform applicable city recognized neighborhood associations of potential development activity within their neighborhoods.

B. *Pre-application waivers*.

1. A pre-application conference is required for all Type II, Type III and applicant-initiated Type IV applications, and certain Type I applications, unless waived by the Planning Official. Generally, the Planning Official may waive the pre-application conference if a determination is made that the proposal is relatively simple (e.g., has few, if any, development-related issues), or it involves subsequent phases of an approved development where requirements are known, or an application is substantially similar to a prior proposal affecting substantially the same property, as determined by the Planning Official. Planning Official shall notify affected Neighborhood Associations of proposed development application and copy of pre-application waiver letter.
2. To request a waiver of a pre-application conference, the applicant shall submit:
   a. A completed pre-app waiver request form provided by the Planning Official;

b. A written narrative justifying the request for pre-application waiver; and

c. Required fee.

C. *Information required for contingent vesting.* To qualify for contingent vesting under Section 20.210.110 VMC, the applicant shall submit at a minimum the pre-application items listed in Sections 20.210.080(D)(1)-(6) VMC; provided, that an applicant shall not contingently vest unless the applicant submits all of the information required for the actual application within the timeframe set forth in Section 20.210.110 VMC. The Planning Official may modify requirements for pre-application materials and may conduct a pre-application conference with less than all of the required information. However, failure to provide all of the required information may prevent the Planning Official from identifying all applicable issues or providing the most effective pre-application conference and may preclude contingent vesting under Section 20.210.110 VMC. Review for completeness of the pre-application submittal will not be conducted by staff at the time of submittal and completeness is the responsibility of the applicant.

D. *Application for a pre-application conference – Application – Fees.* The applicant must submit a completed application form as prescribed by the Planning Official with applicable fee per Chapter 20.190 VMC. The Planning Official may waive submittal requirements upon request if found to be inapplicable to the proposed development:

1. Completed and signed pre-application conference request form provided by the Planning Official.
2. Information legible for digital reproduction and clearly marked with the following: project name; vicinity map; scale; north arrow; date; applicant's name, phone and fax numbers; contact person's name, phone and fax numbers.
3. A narrative description of the following:
   a. Uses proposed for the site.
   b. Hours of operation.
   c. Estimated vehicular traffic to and from the site.
4. *Preliminary architectural information.* A brief narrative description of the following:
   a. Gross square footage of each structure and outdoor activity center proposed to be built or retained on site.
   b. Proposed and potential uses and occupancy group of each structure proposed to be built or retained on site.
   c. Number of floors, building height, and construction type of each structure and outdoor activity area proposed to be built on site.

d. Conceptual plans showing at least the gross square footage of each structure proposed to be built or retained on site.

e. Conceptual elevation drawing of each structure proposed to be built or retained on site.

f. Show the dimensions and area of the project site.

5. Existing and Proposed on-site Structures and Improvements:

a. Identify use(s) of all existing and proposed structures.

b. Location, dimensions, and height of all existing and proposed buildings and structures.

c. Location and dimensions of existing and proposed recreation areas and open space.

d. Location of existing and proposed driveways, off-street parking and loading areas, bicycle parking, and pedestrian and bicycle pathways.

e. Location, dimensions, and screening of proposed storage areas for solid waste, including recyclable materials and organics.

f. *Existing or conceptual plan showing lighting and landscaping.* Landscape plan should include location of driveways and buffering off-street parking and loading areas.

g. Location and dimensions of existing and proposed streets, rights-of-way and public and private access easements on and adjoining the site.

h. Location and dimensions of all existing and proposed above ground and below ground utilities.

6. *Preliminary engineering information.* Provide a conceptual drawing or sketch showing the following:

a. Approximate location of existing fire hydrants within a one-hundred foot (100') radius of the site.

b. Preliminary assessment of low impact development implications and proposed method of providing storm-water drainage on the site as required in VMC 14.25.

c. Strategy narrative for proposed erosion control measures as required in VMC 14.24.

d. Proposed grading activity for the site, indicating areas of native soil preservation, compaction prevention, and proposed cuts and fills.

E. *Notice.* Within 14 calendar days after receipt of an application for a pre-application conference, the Planning Official shall mail written or electronic notice to the applicant and to other interested agencies and parties. The notice shall state the date, time, location, and purpose of the pre-application conference.

F. *Planning Official's role.* The Planning Official shall coordinate the involvement of agency staff responsible for planning, development review, roads, drainage, parks and other subjects, as appropriate, in the pre-application conference process. Relevant staff shall attend the pre-application conference or shall take other steps to fulfill the purposes of the pre-application conference.

G. *Scheduling.* The pre-application conference shall be conducted at least five calendar days after the notice is mailed but not more than 28 calendar days after the Planning Official accepts the application for pre-application conference. The Planning Official shall reschedule the conference and give new notice if the applicant or applicant's representative cannot or does not attend the conference when scheduled.

H. *Pre-application conference summary.* The Planning Official shall provide to the applicant, other attending parties, and those who request a copy of the pre-application report in writing. The preapp report shall provide the following to the extent possible given the information provided by the applicant:

1. Summarize the proposed application(s);
2. Identify the relevant approval criteria and development standards in the Vancouver Municipal Code or other applicable law and exceptions, adjustments or other variations from applicable criteria or standards that may be necessary;
3. Evaluate submitted information the applicant offered to comply with the relevant criteria and standards, and identify specific additional information that is needed to respond to the relevant criteria and standards or is recommended to respond to other issues;
4. Identify applicable application fees in effect at the time, with a disclaimer that fees may change;
5. Identify information relevant to the application that may be in the possession of the city or other agencies of which the city is aware, such as:
    a. Comprehensive plan map designation and zoning on and in the vicinity of the property subject to the application;
    b. Physical development limitations, such as steep or unable slopes, wetlands, well-head protection areas or water bodies, that may exist on and in the vicinity of the property subject to the application;
    c. Those public facilities that will serve the property subject to the application, including fire services, roads, storm drainage, and, if residential, parks and schools, and relevant service considerations, such as minimum access and fire-flow requirements or other minimum service levels and impact fees; and
    d. Confirm the application submittal requirements and what submittal information is waived.

e. Where applicable, indicate whether the pre-application submittal was complete so as to trigger contingent vesting under Section 20.210.110 VMC.

I. *Request for second conference.* An applicant may submit a written request for a second pre-application conference within one calendar year after an initial pre-application conference. There is no additional fee for a second conference if the proposed development is substantially similar to the one reviewed in the first pre-application conference or if it reflects changes based on information received at the first pre-application conference. A request for a second pre-application conference shall be subject to the same procedure as the request for the initial pre-application conference.

J. *Expiration.* The pre-application comments from the city shall expire one year from the date the pre-application conference is held. A counter-complete application that the Planning Official finds is substantially similar to the subject of a pre-application conference must be submitted within one calendar year after the last pre-application conference or after approval of waiver of pre-application conference. Once the pre-application comments have expired the applicant must file a new request for a pre-application conference or receive approval of a pre-application waiver request in order to submit a development application.

20.210.090 Review For Counter-Complete Status.

A. *Prior to acceptance of application.* Before accepting Type I, II, or III applications or applicant-initiated Type IV applications Map Amendments, a planning staff member from the city shall determine that the application is counter-complete. Review for counter-complete status does not include an evaluation of the substantive adequacy of the information in the application.

B. *Complete application.* If the planning staff member decides that the application is counter-complete at the time of application, the application shall be accepted for review for fully-complete status.

C. *Incomplete application.* If the planning staff member decides the application is not counter-complete, the application shall be rejected and missing items identified that are needed to make the application counter-complete.

D. *Application content.* A counter-complete application shall include all of the items listed in the chapter of the code applicable to the type of development proposed, unless waived in writing by the Planning Official.

20.210.100 Review For Fully Complete Status.

A. *Determination.* Within 28 calendar days after receiving a counter-complete Type II or III application or applicant-initiated Type IV Map Amendment application, the Planning Official shall mail or provide in person a written determination to the applicant stating either:

1. That the application is fully complete; or

2. That the application is not fully complete and what is necessary to make the application complete.

B. *Application content.* An application shall include all of the information listed as application requirements in the application form; provided, that:

1. The Planning Official may upon written request waive application requirements that are clearly not necessary to show an application complies with relevant criteria and standards and may modify application requirements based on the nature of the proposed application, development, site or other factors. Requests for waivers shall be reviewed before applications are submitted for counter-complete review, or discussed at the pre-application conference, and confirmed in the pre-application conference summary.

2. The decision about the fully-complete status of an application, including any required engineering, traffic or other studies, shall be based on the criteria for completeness and methodology set forth in the Vancouver Municipal Code or in implementing measures adopted in a timely manner by the Planning Official and shall not be based on differences of opinion as to quality or accuracy.

3. An application's fully-complete and vesting status may be revoked if the Planning Official determines that the applicant intentionally submitted false information.

C. *Incomplete application.* If the Planning Official decides an application is not fully complete, then, within the time provided in Subsection (A) of this section, the Planning Official shall send the applicant a written statement indicating that the application is incomplete based on a lack of information and listing what is required to make the application fully complete.

1. The statement shall specify a date by which the required missing information must be provided to restart the fully-complete review process. The statement shall state that an applicant can apply to extend the deadline for filing the required information and explain how to do so.

2. The statement also may include recommendations for additional information that, although not necessary to make the application fully complete, will be required to address other issues that are relevant to the review.

3. If the required information is not submitted by the date specified and the Planning Official has not extended that date, within seven calendar days after that date, the Planning Official may take the action in subsections 3(a) and 3(b) of this section. If the required information is submitted by the date specified, then within 14 calendar days, the Planning Official shall decide whether the application is fully complete and, if not, the Planning Official may:

a. Reject and return the application and an amount up to 80% of the application fees by mail, together with a written statement that lists the remaining additional information needed to make the application fully complete; or

b. *Issue a decision denying the application, based on a lack of information.* Provided, the Planning Official may allow the applicant to restart the fully-complete review process a second time by providing the required missing information by a date specified by the Planning Official, in which case the Planning Official shall retain the application and fee pending expiration of that date or a fully-complete review of the application as amended by that date.

D. *Fully-complete application.* If the Planning Official determines that a Type I, II, or III application is fully complete, he or she shall:

1. If a Type I application, issue a Notice of Decision within 28 calendar days pursuant to Section 20.210.040(F) VMC;

2. If a Type II application, issue a Notice of Application within 14 calendar days pursuant to Section 20.210.050(E) VMC.

3. If a Type III application, issue a Notice of Application/Hearing within 14 days pursuant to Section 20.210.060(E) VMC.

E. *Automatic determination.* A Type I, II, or III application and applicant-initiated Type IV-Map Amendment application shall be determined fully complete if a written determination has not been mailed to the applicant within 28 calendar days of the date the counter-complete application is received by the city. An application shall be determined fully complete if a written determination has not been mailed to the applicant within 14 calendar days of the date that the necessary additional information is submitted pursuant to subsection (C).

F. *Fully complete date.* The date a fully-complete application is filed for purposes of vesting is the date the counter-complete application is originally filed or the date any necessary additional information is submitted pursuant to subsection (C), whichever is later, regardless of whether the application is determined to be fully complete under subsection (A)(1) or automatically determined fully complete under subsection (E).

G. *Request for additional information.* A fully-complete determination shall not preclude the city from requesting additional information, studies or changes to submitted information or plans if new information is required or substantial changes to the proposal occur.

20.210.110 Vesting of Applications.

A. *Vested application.* Type I, II, or III applications shall be considered under this chapter and the zoning, development and other land use control ordinances contained in the VMC, and any uncodified ordinances modifying the same, in effect on the date a fully complete application is filed with the city. For the purposes of this section, a vested application shall mean that the applicant is entitled to implement the development proposal described in the application, under the zoning, development and land use ordinances applied by the city in its review of the application without being subject to changes in development regulations subsequent to the submittal date except to the extent allowed by the city's police power to protect the public health, safety, and welfare.

   Once an application is approved and if the approval contains a detailed description of the uses, including a detailed site plan drawn to scale, specifying the location of all buildings and improvements to be constructed in conjunction with the use(s), and such site plan is consistent with all laws and regulations in effect at the time the original application vested, then all land use applications in connection with the approved use(s) and/or site plan are vested to the laws and regulations in effect at the time of the vesting of the original permit application, until the land use approval expires.

B. *Contingent vesting.* An application which is subject to a pre-application conference shall contingently vest on the date a complete pre-application is filed, if a fully-complete application for substantially the same proposal is filed within 180 calendar days of the date the review authority issues its written summary of the pre-application conference, and provided the pre-application submittal met the requirements of 20.210.080(C).

C. *Subsequent Regulations.* An applicant may have the option of subjecting its development to any subsequently enacted land use ordinances. However, should an applicant choose to subject its development to a subsequently enacted land use ordinance, this shall have the effect of subjecting the development to all land use ordinances enacted after the application is vested, unless the city and applicant agree otherwise. In order for the Planning Official to grant such a request, the applicant must demonstrate how later enacted ordinance(s) will benefit both the project, and the city while maintaining consistency with the comprehensive plan. Applicant must also demonstrate that use of later enacted ordinances will not conflict with other ordinances the development remains subject to and will not be significantly detrimental to the health, safety, or general welfare of the city. Planning Official shall review and either approve the request or determine if a new application must be submitted.

D. *Exception to vesting.* Unless expressly authorized elsewhere in this title, vested rights shall apply only to development regulations and shall not be applied to development review fees or impact fees.

20.210.120 Public Hearing Procedures.

A. *Assignment of review bodies*.

1. Proposed land use actions shall be reviewed as indicated in Table 20.210.020-1. All listed actions reviewed by the Hearing Examiner, Planning Commission, and City Council shall be conducted at a public hearing according to the applicable procedures in the Vancouver Municipal Code, and decisions shall be issued based on compliance with applicable standards, pursuant to this title.

2. The Planning Official shall have the authority to assign the review body in cases in which this chapter and the Vancouver Municipal Code do not clearly identify the appropriate review body. The act of assigning the review body shall be a Type I decision.

B. *Hearing requirements.* Hearing requirements applicable to the Hearing Examiner and Planning Commission actions (appeals of Type I and II applications and initial review of Type III applications and applicant-initiated Type IV Map Amendment applications).

1. *Notice of hearing.* Notice of a Type I or II appeal hearing shall be given by the Planning Official in the following manner (notice of hearing for a Type III application or applicant-initiated Type IV Map Amendment application is governed by Section 20.210.060(E) VMC:

   a. At least 10 calendar days prior to the hearing date, notice shall be sent by mail to:

      i. The applicant and all owners of the site that is the subject of the application;

      ii. All parties of record;

      iii. Any neighborhood or community organization recognized by the City Council and whose boundaries include the site;

      iv. Any person who has submitted a written request to be notified; and

      v. The appellant and all parties to the appeal.

   b. The Planning Official shall cause an affidavit of mailing of notice to be prepared and made a part of the file, which demonstrates the date that the required notice was mailed to the necessary parties.

   c. At least 10 calendar days prior to the hearing, notice of the hearing shall be given in a newspaper of general circulation in the city. An affidavit of publication concerning such notice shall be made part of the administrative record.

   d. At least 10 calendar days prior to the hearing, notice of the hearing shall be posted on the site, pursuant to subsection (2) below. An affidavit of posting concerning such notice shall be prepared and shall be submitted and made part of the administrative record.

2. *Content of notice.* Notice of a Type I or II appeal hearing shall contain the following information:

a. Explain the nature of the appeal.

b. List the applicable criteria that apply to the appeal issues.

c. Set forth the street address or other easily understood geographical reference to the subject property.

d. State the date, time, and location of the hearing.

e. State that the failure to raise an issue at the hearing, in person, or by letter, or failure to provide statements or evidence sufficient to afford the decision-maker an opportunity to respond to the issue may preclude further appeal based on that issue.

f. Include the name of a city representative to contact and the telephone number where additional information may be obtained.

g. State that a copy of the appeal and all documents and evidence submitted by or on behalf of the appellant and the applicable criteria are available for inspection at no cost and that copies shall be provided at a reasonable cost.

h. State that a copy of the staff report shall be available for inspection at least 10 calendar days prior to the hearing, and that a copy shall be provided at a reasonable cost.

i. Include a general explanation of the requirements for submission of testimony and the procedure for conducting hearings.

3. *Staff report issuance.* At least 10 calendar days before the date of the hearing for a Type III application, an applicant-initiated Type IV Map Amendment application or Type I or II appeal hearing, the Planning Official shall issue a written staff report and recommendation regarding the application(s), shall make available to the public a copy of the staff report for review and inspection, and shall mail a copy of the staff report and recommendation without charge to the applicant and applicant's representative. The Planning Official shall mail or provide a copy of the staff report at reasonable charge to other parties who request it. If the Planning Official does not issue the staff report at least 10 days before the date of the hearing, the applicant or appellant shall be entitled to ask for a continuance without penalty.

4. *Conduct of the hearing.* At the commencement of the hearing, a statement shall be made to those in attendance that:

a. The Hearing Examiner or chair of the Planning Commission, as the case may be, shall:

i. State that testimony and evidence shall be directed toward the relevant criteria described in the staff report or other criteria in the plan or land use regulation that the person testifying believes to apply to the decision;

ii. State that failure to raise an issue at the hearing may limit the issues that can be considered at the City Council hearing.

b. Staff shall present a staff report, containing a summary of the proposal or appeal, and recommended findings and conclusions. Conditions of approval for a Type III application may be recommended.

c. The applicant or appellant shall be entitled to present evidence and argument in support of the application(s) or appeal.

d. Any participant may present evidence and argument for or against the proposal or appeal.

e. The applicant or appellant shall have the final opportunity to conclude its case before close of the public hearing.

f. The Hearing Examiner or chair of the Planning Commission shall declare the public hearing closed and may have questions for staff, the applicant/appellant, or any member of the public who testified.

5. *Additional evidence.* Prior to the conclusion of the initial evidentiary hearing, any participant may request an opportunity to present additional relevant evidence or testimony regarding the application so long as that evidence and testimony is within the scope of the hearing. The Hearing Examiner or the Planning Commission may grant such a request by continuing the public hearing pursuant to Subsection 5 (a) below or by leaving the record open for additional written evidence or testimony pursuant to Subsection 5(b) below.

a. *Continuance.* If the Hearing Examiner or the Planning Commission grants a continuance, the hearing shall be continued to a date, time, and place certain at least seven calendar days from the date of the initial evidentiary hearing. Further notification is not required in such cases. Continuation of hearings to time or place uncertain is also permitted, provided that new notice is given pursuant to this chapter. If the applicant initiates a hearing continuance after public notice is mailed, or causes a continuance by providing inadequate information, fees as per Chapter 20.190 VMC shall apply. An opportunity shall be provided at the continued hearing for persons to present and rebut new evidence and testimony. If new written evidence is submitted at the continued hearing, any person may request, prior to the conclusion of the continued hearing, that the record be left open for at least seven calendar days to allow the submittal of written evidence or testimony for the purpose of responding to the new written evidence;

b. *Record left open.* If the Hearing Examiner or Planning Commission leaves the record open for additional written evidence or testimony, the record shall be left open for at least seven calendar days. The Hearing Examiner or Planning Commission shall state where additional written evidence and testimony can be sent, and shall announce any limits on the nature of the evidence that will be received after the hearing. Any participant may file a written request with the Hearing Examiner or Planning Commission for an opportunity to respond to new evidence submitted during the period the record was left open. If such a request is filed, the Hearing Examiner or Planning Commission shall reopen the record pursuant to this subsection. Unless waived by the applicant, the Hearing Examiner or Planning Commission shall allow the applicant at least seven calendar days after the record is closed to all other parties to submit final written arguments in support of the application period. The applicant's final submittal shall be considered part of the record, but shall not include any new evidence.

6. Content and custody of the record.

   a. The record shall contain all testimony and evidence that is submitted and not rejected;

   b. The Hearing Examiner or Planning Commission may take official notice of judicially-cognizable facts pursuant to the applicable law. If the Hearing Examiner or Planning Commission takes official notice, the Hearing Examiner or Planning Commission must announce this intention and allow the parties to the hearing to present evidence concerning the fact;

   c. The Hearing Examiner or Planning Commission shall retain custody of the record as appropriate, until a final decision is rendered.

7. *Impartiality.* Parties to a Type III application or applicant-initiated Type IV Map Amendment hearing and Type I or II appeal hearing are entitled to an impartial review authority as free from potential conflicts of interest and pre-hearing ex parte contacts as reasonably possible. It is recognized, however, that the public has a countervailing right of free access to public officials. Therefore:

   a. The Hearing Examiner or any member of the Planning Commission shall disclose the substance of any pre-hearing ex parte contacts (excluding de minimis contacts) with regard to the matter at the commencement of the public hearing on the matter. The Hearing Examiner or member of the Planning Commission shall state whether the contact has impaired the impartiality or ability of the examiner to decide, or the Planning Commission member to vote on, the matter and shall participate or abstain accordingly;

b. The Hearing Examiner or member of the Planning Commission shall not participate in any proceeding or action in which any of the following has a direct financial interest excluding de minimis interests: The Hearing Examiner or member of the Planning Commission or said person's spouse, brother, sister, child, parent, father-in-law, mother-in-law, partner, any business in which the member is then serving or has served within the previous two years, or any business with which the member is negotiating for or has an arrangement or understanding concerning prospective partnership or employment. Any actual or potential interest shall be disclosed by the Hearing Examiner or member of the Planning Commission at the hearing where the action is being taken;

c. In cases involving the disqualification or refusal of a Hearing Examiner, the city shall provide a substitute Hearing Examiner in a timely manner subject to the above impartiality rules. In cases involving the disqualification or refusal of a member of a Planning Commission, the remaining members of the Planning Commission shall hear the case.

8. Ex parte communications.

a. The Hearing Examiner or member of the Planning Commission shall not:

i. Communicate, directly or indirectly, with any party or representative of a party in connection with any issue involved in a hearing, except upon giving notice, and an opportunity for all parties to participate.

ii. Take notice of any communication, report, or other materials outside the record prepared by the proponents or opponents in connection with the particular case.

b. No decision or action of the Hearing Examiner or Planning Commission shall be invalid due to ex parte contacts or bias resulting from ex parte contacts with the Hearing Examiner or member of the Planning Commission if the Hearing Examiner or member of the Planning Commission:

i. Places on the record the substance of any written or oral ex parte communications concerning the decision or action; and

ii. Makes a public announcement of the content of the communication and of the parties' right to rebut the substance of the communication made at the first hearing following the communication where action shall be considered or taken on the subject to which the communication is related.

c. Communication between city staff and the Hearing Examiner or Planning Commission as part of a Type III application or an applicant-initiated Type IV-Map Amendment application or appeal of a Type I or II appeal hearing shall not be considered ex-parte contact.

9. Presenting and receiving evidence.

a. The Hearing Examiner or Planning Commission may set reasonable time limits for oral presentations and may limit or exclude cumulative, repetitious, irrelevant or personally derogatory testimony;

b. No oral testimony shall be accepted after the close of the public hearing. Written testimony may be received after the close of the public hearing, but only pursuant to the schedule and procedure announced by the Hearing Examiner or chair of the Planning Commission prior to the close of the public hearing, or as otherwise provided by this section;

c. The Hearing Examiner or members of the Planning Commission may visit the site and the surrounding area, and may use information obtained during the site visit to support his or her decision, provided the information relied upon is disclosed at the hearing and that an opportunity is provided to rebut such evidence. In the alternative, a site visit may be conducted by the Hearing Examiner or the Planning Commission for the purpose of familiarizing the reviewing body with the site and the surrounding area, but not for the purpose of independently gathering evidence. In such a case, at the commencement of the hearing, the Hearing Examiner or members of the Planning Commission shall disclose the circumstances of the site visit and shall provide the parties with an opportunity to question the Hearing Examiner or members of the Planning Commission concerning the site visit.

10. The decision process.

a. *Basis for decision.* Approval, conditional approval or denial of a Type III application, an applicant-initiated Type IV Map Amendment application or a Type I or II appeal shall be based on standards and criteria, which shall be set forth in the Vancouver Municipal Code or in uncodified ordinances.

b. *Final Decision.* The Hearing Examiner or Planning Commission shall issue a final order containing the following information:

i. The nature of the application or appeal in sufficient detail to apprise persons entitled to notice of the decision;

ii. The address or other geographic description of the subject property;

iii. If the actual decision is not mailed, a statement of where the Final Decision can be obtained;

iv. The date the decision shall become final, unless appealed.

v. A statement that all persons entitled to notice or who have standing under Section 20.210.130(B)(2) VMC may appeal the decision;

vi. A statement in boldface type briefly explaining how an appeal can be filed, the deadline for filing such an appeal, and where further information can be obtained concerning the appeal;

vii. A statement that the complete case file, including findings, conclusions and conditions of approval, if any, is available for review. The notice shall list the place, days and times where the case file is available and the name and telephone number of the city representative to contact about reviewing the case file;

viii. A statement of the applicable criteria and standards pursuant to the Vancouver Municipal Code and other applicable law;

ix. A statement of the facts demonstrating how the application or appeal does or does not comply with applicable approval criteria;

x. The reasons for a conclusion to approve, deny or condition the application or appeal;

xi. The decision to approve or deny the application or appeal, and if approved, conditions of approval necessary to ensure the proposed development will comply with the applicable law;

xii. The date the Final Decision is mailed; and

xiii. A statement regarding any procedural issues decided in the case, with the reasons to approve or deny said procedural request, if any.

c. *Decision-making time limits.* A Final Decision for any Type III application, applicant-initiated Type IV Map Amendment application, or Type I or II appeal decisions shall be filed with the Planning Official within 14 calendar days after the close of the record.

11. *Distribution of Final Decision.* A Final Decision on a Type III application or, applicant-initiated Type IV Map Amendment application, or Type I or II appeal decision shall be mailed, to the following persons:

a. The applicant and/or appellant;

b. The owner(s) of the property included in the subject application or appeal;

c. Any city-recognized neighborhood group whose boundaries include the site;

d. Anyone who requested in writing a notification of the decision on a particular matter.

e. The Planning Official shall cause an affidavit of mailing of such Final Decision to be prepared and made a part of the file, which indicates the date the notice was mailed and demonstrates that the required notice was mailed to the necessary parties in a timely manner.

12. *Contents of Notice of Decision.* A Notice of Decision shall include the information contained in Section 20.210.120(B)(10)(b)(1)-(12) VMC.
13. *Distribution of the Notice of Decision.* A Notice of Decision of a Type III application, applicant-initiated Type IV Map Amendment application, or Type I or II appeal decision shall be mailed on the same day as the Final Decision to the following persons:
    a. Any governmental agency which is entitled to notice under an intergovernmental agreement entered into with the city that includes provision for such notice or which is otherwise entitled to such notice;
    b. Anyone who provided oral or written testimony entered into the record at the public hearing.
14. *Final Decision and effective date.* A Hearing Examiner or Planning Commission decision is final for purposes of appeal when the Final Decision and Notice of Decision is mailed. Such decision becomes effective on the day after the appeal period expires, unless an appeal is filed, in which case the procedures of Section 20.210.130 VMC shall apply.

C. Hearing requirements applicable to City Council hearings.
1. Unless otherwise provided in the rules of procedure adopted by the City Council, for both closed-record hearings and open-record hearings:
    a. The Mayor or Mayor pro tem shall have the authority to:
        i. Regulate the course, sequence, and decorum of the hearing;
        ii. Dispose of procedural requirements or similar matters; and
        iii. Impose reasonable time limits for oral presentations.
    b. No person shall address the council without:
        i. Receiving recognition from the Mayor or Mayor pro tem; and
        ii. Stating their full name and residence address.
        iii. Disruptive conduct such as audience demonstrations in the form of applause, cheering or display of signs may be cause for expulsion of a person or persons from the hearing, termination or continuation of the hearing or other appropriate action determined by the Mayor or Mayor pro tem.
2. Unless otherwise provided in the rules of procedures adopted by the City Council, the Mayor or Mayor Pro Tem shall conduct the hearing as follows:
    a. The hearing shall be opened by a statement from the Mayor and/or City Attorney setting forth the nature of the matter before the body, a general summary of the procedures applicable to the hearing, and a summary of the standards for decision-making;

b. A presentation of the staff report shall be given;

c. For open-record hearings, the public shall be invited to testify;

d. For open-record hearings, the public hearing may be continued to allow additional testimony or it may be closed; and

e. The City Council's deliberation may include questions to the staff, comments from the staff, or inquiries directed to any person present.

20.210.130 Appeals.

A. *Appeal submittal.* Any party with standing under Section 20.210.130(B) VMC may submit a written appeal of any Type I, II or III decision to the Planning Official containing the following items listed below. The appeal must be received no later than 14 calendar days after written notice of the decision is mailed. Receipt of a complete appeal submittal shall stay the original decision until the city reaches a final decision on the appeal, except as provided for by Section 20.210.040(G) VMC.

1. The case number designated by the city and the name of the applicant;

2. The name and signature of each petitioner or their authorized representative and a statement showing that each petitioner has standing to file the appeal under this chapter. If multiple parties file a single petition for review, the petition shall designate one party as the contact representative for all contact with the Planning Official. All contact with the Planning Official regarding the appeal, including notice, shall be with the contact representative;

3. The specific aspect(s) of the decision or determination being appealed, and the specific reasons why each aspect is in error as a matter of fact or law;

4. A statement demonstrating that the specific issues raised on appeal were raised during the period in which the record was open;

5. The appeal fee as per Chapter 20.195 VMC, Fees. The fee shall be refunded if the appellant requests withdrawal of the appeal in writing at least 14 calendar days before the scheduled appeal hearing date.

B. *Standing to appeal*.

1. *Type I decision.* Only the applicant and property owner have standing to appeal a Type I decision, unless otherwise specified in this title.

2. *Type II decision.* The following parties have standing to appeal a Type II decision:

a. The applicant or owner of the subject property;

b. Any other party who demonstrates that they participated in the decision process through the submission of written testimony.

3. *Type III decision.* The following parties have standing to appeal a Type III decision:
    a. The applicant or owner of the subject property;
    b. Any party who testified verbally or in writing at the public hearing;
    c. Any other party, who demonstrates that they participated in the decision process through the submission of written testimony;
    d. Any party who provides a written request for a copy of the notice of decision; and
    e. City staff.
4. *Type IV Map Amendment Decision.* The following parties have standing to appeal a Type IV Map Amendment decision:
    a. The applicant or owner of the subject property;
    b. Any party who testified verbally or in writing at the public hearing;
    c. Any other party, who demonstrates that they participated in the decision process through the submission of written testimony;
    d. Any party that provides a written request for a copy of the notice of decision; and
    e. City staff.

C. *Appeal review process*.

1. All complete appeals submitted which are eligible as specified in this chapter shall be scheduled for review at a public hearing such that a final decision can be rendered within 60 calendar days for closed-record appeals, and within 90 calendar days for open-record appeals. Further extensions are permitted upon mutual agreement of the appellant, the applicant, and the Planning Official. If a final decision is not reached within this time, the Planning Official shall so notify the appellant and shall provide a reason for the delay and an estimated date of final decision issuance.
2. Notice of the appeal hearing shall be mailed to all parties listed in Section 20.210.120(B)(11) and (13) VMC.
3. Appeal hearings shall be open or closed record as indicated in Table 20.210.130 -1 below.
    a. An open-record appeal hearing before the Hearing Examiner shall be conducted according to the procedures set forth in Section 20.210.120-B VMC.

b. A closed-record appeal hearing before the City Council shall be limited to argument from the appellant, the applicant and city staff, and deliberation by the City Council. Argument and deliberation shall be limited to the record established at the original open-record hearing. The record shall consist of testimony and deliberation at the original hearing as recorded by an audio/visual tape or transcript certified as accurate and complete, any other materials submitted into the record, and the final order being appealed.

c. Hearing rules shall otherwise be as specified by the review body.

d. Notice of appeal decisions shall be mailed to all parties listed under Section 20.210.130(C)(2) VMC.

4. See Section 20.285 VMC for additional rules applicable to appeals for Type IV decisions.

TABLE 20.210.130-1. APPEAL BODIES

Land Use Action	Review Authority if Appealed, and Open (O) or Closed (C) Record Hearing
Type I Applications	Hearing Examiner (O); Further appeal to Superior Court
Type II Applications	Hearing Examiner (O); Further appeal to Superior Court
Type III Applications	City Council (C); Further appeal to Superior Court
Type IV Applications	Superior Court

D. *Subsequent appeals*.

1. Appeal decisions by any review body may be subsequently appealed to Superior Court within 21 calendar days after the date of decision, subject to compliance with appeal eligibility and notice provisions as specified by Chapter 36.70C RCW.

2. Appeal decisions by the Hearing Examiner or City Council on shoreline substantial development permits, shoreline variance permits, and shoreline conditional use permits may be subsequently appealed to the State Shoreline Hearings Board pursuant to applicable law.

20.210.140 Post Decision Review.

A. Applicability.

1. Except for recorded short subdivision and subdivision plats, master plans and public facility master plans, post-decision procedures may modify the development without necessarily subjecting the change to the same procedure as the original application. Such changes may be warranted by ambiguities or conflicts in a decision and by new or more detailed information, permits or laws.

2. At any time, a party to a final decision made under this chapter or their successor in interest may file with the Planning Official an application for post-decision review of a Type I, II or III decision, describing the nature of the proposed change to the decision and the basis for that change, including the applicable facts and law, together with the fee prescribed for that application, as provided in Chapter 20.190 VMC, Fees.

3. An application for post-decision review is not subject to pre-application review. It is subject to counter-complete and fully-complete determinations; provided, that the Planning Official shall not require an application for post-decision review to contain information that is not relevant and necessary to address the requested change or the facts and law on which it is based.

4. As part of a determination of completeness of an application for post-decision review of a Type I, II or III decision, the Planning Official shall classify the application as a Type I, II or III procedure and advise the applicant in writing of that classification. In addition, all Parties of Record from the original decision shall also be notified of the decision in writing. The classifications in the table are recommended, but the classification of each post-decision review shall be based on the circumstances of that decision and the guidelines in subsection (B) of this section. The decision classifying the application shall be subject to appeal as part of the decision on the merits of the post-decision review.

5. Post-decision review cannot substantially change the nature of development proposed pursuant to a given decision. As part of a determination of completeness of an application for post-decision review of a Type I, II or III decision, the Planning Official may issue a decision that the proposed change in a decision should not be subject to post-decision review; it should be subject to a new application on the merits of the request. That decision may be appealed to the Hearing Examiner pursuant to Section 20.210.130 VMC.

6. An application for post-decision review does not extend the deadline for filing an appeal of the decision being reviewed and does not stay appeal proceedings.

7. Post-decision review can only be conducted in regard to a decision that approves or conditionally approves an application. An application that is denied is not eligible for post-decision review.

B. Exceptions. The modification provisions in this section do not apply to the following:

1. Recorded subdivision plats. See Section 20.320.080(D) VMC.
2. Master plans. See Section 20.260.060.
3. Public facility master plans. See Section 20.270.040(C).

C. Classification of post-decision review.

1. An application for post-decision review of a Type I decision shall be subject to a Type I review procedure.
2. An application for post-decision review of a Type II decision shall be subject to a Type I review procedure if the review authority finds the requested change in the decision:
   a. Does not increase the potential adverse impact of the development authorized by the decision; and
   b. Is consistent with the applicable law or variations permitted by law, including a permit to which the development is subject; and
   c. Does not involve an issue of broad public interest, based on the record of the decision; and
   d. Does not require additional SEPA review.
3. An application for post-decision review of a Type II decision shall be subject to a Type II review procedure if it is not subject to Type I review.
4. An application for post-decision review of a Type III decision shall be subject to a Type I review procedure if the review authority finds the requested change in the decision:
   a. Reduces the potential adverse impact of the development authorized by the decision; and
   b. Is consistent with the applicable law or variations permitted by law, including a permit to which the development is subject; and
   c. Does not involve an issue of broad public interest, based on the record of the decision.
5. An application for post-decision review of a Type III decision shall be subject to a Type II review procedure if the review authority finds the requested change in the decision:
   a. Does not increase the potential adverse impact of the development authorized by the decision or SEPA determination; and
   b. Is needed to address a minor change in the facts or the law, including a permit to which the development is subject; and
   c. Does not involve an issue of broad public interest, based on the record of the decision.
6. An application for post-decision review of a Type III decision shall be subject to a Type III review procedure if it is not subject to a Type I or II procedure.

7. When a post-decision request for a change involves a condition of approval that was imposed in the original decision to address a specific potential impact of the proposed development, then that condition of approval can be changed only using the same type process as the original decision.

D. Modification. Modification of a decision other than by a timely appeal or post-decision review shall be accomplished by means of new application; provided, that a new application cannot be filed within one calendar year after the date of a decision denying a substantially similar application, unless such earlier decision provided otherwise.

E. Vesting. Applications which qualify for post decision review shall remain vested to the laws in place at the time of the original application vested.

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CHAPTER 20.220
REVIEW BODIES

Sections:

20.220.010 Planning Commission.

20.220.020 Hearing Examiner.

20.220.030 City Council.

20.220.050 Clark County Historic Preservation Commission.

20.220.010 Planning Commission.

A. *Establishment.* Pursuant to Article XI, Section 11 of the Washington State Constitution and Section 8.01 of the City Charter, a Vancouver Planning Commission shall be established and maintained consisting of seven residents of the city or Vancouver Urban Growth Area to be appointed by the mayor with the approval of the City Council.

B. *Representative membership.* In selecting members for appointment to the Planning Commission, the mayor and City Council shall seek to provide representation to a wide variety of neighborhoods, businesses and other interests concerned with the land use, development and quality of life in Vancouver. No more than one member of the Planning Commission may represent the unincorporated urban growth area intended to annex and develop as a part of the city of Vancouver.

C. Authority and responsibilities.

1. The Planning Commission shall have such powers and perform such duties as are prescribed by Chapter 35.63 RCW, other applicable state law, and the city code. The Planning Commission shall review and make recommendations to City Council on master plans greater than 25 acres in size, amendments to the comprehensive land use plan, amendments to the zoning map of 25 acres or greater in size, and implementing standards and regulations that are generally legislative in nature.

2. The Planning Commission is specifically responsible for the following:

a. Formal review of actions listed under Chapters 20.210 and 20.285 VMC, and review of SEPA appeals filed pursuant to such actions.

b. Informal or advisory review of studies, analysis or reports related to land use matters as directed by City Council.

c. Other duties related to land use matters as directed by City Council, provided they are not inconsistent with state law.

D. *Terms.* Except as provided in this section, the term of office for each member shall be four years, running from January 1st to December 31st. No member may serve more than three consecutive terms. Any vacancy that is not a result of the expiration of a term shall be filled for the unexpired term. Members may be removed by the mayor with the concurrence of City Council, for misconduct or neglect of duties or for three consecutive unexcused absences.

E. *Organization.*

1. In December of each year, the Planning Commission shall elect a chair, vice-chair and such other officers as the Planning Commission determines it requires. The term of office for each officer shall run until the subsequent election; provided, that vacancies caused by resignation or removal shall be filled for the remaining term of office.

2. The Planning Commission shall adopt rules for the transaction of its business.

3. The Planning Commission may appoint standing or special committees to which it may assign specific responsibilities, provided that such committee(s) shall make no recommendations except to the Planning Commission.

F. *Meetings.* The Planning Commission shall establish regular monthly or twice-monthly meetings dates pursuant to Chapter 42.30 RCW; provided, that, if no matters are pending, a regular meeting may be canceled. Special meetings of the Planning Commission may be called pursuant to the provisions of state law.

G. *Actions.* All actions of the Planning Commission shall be determined by a majority vote in a meeting at which a quorum is present. A majority of total appointed membership of the Planning Commission shall constitute a quorum.

20.220.020 Hearing Examiner.

This title utilizes a Hearing Examiner, as created and authorized in Chapter 2.51 VMC.

20.220.030 City Council.

A. *Role of City Council.* The role of the City Council in carrying out the provisions of Title 20 VMC is to:

1. Render final decisions on all master plans over 25 acres, final subdivision plats, and text and map amendments;

2. Adopt new comprehensive land use plans, subarea plans, planned actions and area-wide rezoning;

3. Render decisions on annexations under Chapter 20.220 VMC;

4. Render decisions on development agreements; and

5. Hear and decide appeals of certain land use decisions as set forth in Chapter 20.210 VMC.

B. *Additional authority.* The City Council shall have the authority to adopt any other land use related plans and ordinances authorized by law.

20.220.050 Clark County Historic Preservation Commission.

A. *Authority.* The City of Vancouver is established as a "certified local government" as determined by state and federal historic preservation standards. The standards require a commission to serve as the review authority on matters of historic preservation. The Clark County Historic Preservation Commission, as provided in Clark County Code, Section 40.250.030, shall serve as the review authority on matters of historic preservation as outlined in subsection D of this section for properties within the city of Vancouver.

B. Composition of the Commission.

1. The Clark County Historic Preservation Commission shall consist of seven members. Five members of the commission shall be appointed by the Clark County Council and shall be residents of the county and two members of the commission shall be appointed by the Vancouver City Council and shall be residents of the city except as provided for in subsection (B)(2) of this section.

2. The Vancouver City Council and the Clark County Council shall coordinate to ensure that the commission includes at least two professionals who have experience in identifying, evaluating and protecting historic and cultural resources and are selected from among the disciplines of history, public history, architecture, architectural history, historic preservation, planning, cultural anthropology, cultural geography, American studies or the practice of historic rehabilitation or restoration. The commission may take action even if there is a temporary vacancy in one or all of the professional positions. An exception to the residency requirement of the commission members may be granted by the Vancouver City Council for the commission members appointed by the City Council in order to obtain representatives from these disciplines.

C. *Terms.* The terms shall be for three years. Membership on the commission shall be limited to two full consecutive three-year terms. Reappointment after two consecutive terms may be made after at least a one-year absence. Vacancies occurring other than through the expiration of terms shall be filled for the unexpired term. Members may be removed by the city or county councils for inefficiency, neglect of duty or malfeasance in office.

D. *Powers and Duties.* The major responsibilities of the commission are to identify and actively encourage the conservation of the city and county's historic and cultural resources by initiating and maintaining a register of historic places and reviewing proposed changes to register property(ies); to raise community awareness of the county's historic and cultural resources; and to serve as the county's primary resource in matters of historic preservation. In carrying out these responsibilities, the commission shall engage in the following activities:

1. Conduct and maintain a comprehensive inventory of historic and cultural resources within the boundaries of the city of Vancouver to be included in the Clark County cultural resources inventory; publicize, and periodically update, inventory results;
2. Maintain the Clark County heritage register (CCHR). This official register shall be comprised of buildings, structures, sites, objects and districts identified by the commission as having historic significance worthy of recognition by the county and encouragement of efforts by owners to maintain, rehabilitate, and preserve properties;
3. Review nominations to the Clark County heritage register according to criteria in 17.39.060 and 17.39.070 VMC and adopt standards in its rules and procedures to be used to guide this review;
4. Review proposals to construct, change, alter, modify, remodel, move, demolish or significantly affect properties or districts on the Clark County heritage register as provided in VMC 17.39.080; and adopt standards in its rules and procedures to guide this review and the issuances of a certificate of appropriateness or waiver;
5. Submit nominations to the Washington State Heritage Register and National Register of Historic Places;
6. Review nominations to the National Register of Historic Places and provide recommendations to the applicable agency;
7. Provide for comment by the commission on all applications for approvals, permits, environmental assessments or impact statements, and other similar documents pertaining to identified historic or cultural resources or adjacent property(ies) upon staff request;
8. Provide information, comment, and support to the public and agencies on matters related to historic preservation;
9. Encourage recognition of noteworthy efforts in the rehabilitation or maintenance of historic buildings, structures, sites, and districts, and new construction in historic areas;
10. Serve as the local review board for special valuation pursuant to Chapter 84.26 RCW;
11. Conduct all commission meetings in compliance with Chapter 42.30 RCW, Open Public Meetings Act, to provide for adequate public participation.

E. *Rules and Officers*.

1. The commission shall establish and adopt its rules and procedures not inconsistent with this chapter.
2. The commission shall select from among its membership a chair and vice-chair to conduct the commission's business.
3. All official actions of the commission shall require a majority vote of the members present. No member shall be eligible to vote upon a matter unless that member attended the hearing.

F. *Commission Staff.* Staffing for the commission shall be provided by the Clark County community planning department and the city of Vancouver.

G. *Interlocal Agreement Required.* An interlocal agreement shall be established between the city of Vancouver and Clark County implementing the provisions of this chapter.

H. *City Review Staff.* City staff with knowledge of the local resources and the designation and review processes will prepare staff reports and recommendations, and will attend commission work sessions and public hearings concerning properties within the Vancouver urban area.

I. *Appeals.* Appeals of decisions rendered by the Clark County Historic Preservation Commission pertaining to property(ies) within the city of Vancouver shall be heard by the Vancouver City Council.

J. *Education Services.* The city shall provide heritage education services, including but not limited to public workshops, lectures, seminars and educational materials and professional education for commissioners and staff, for both the city of Vancouver and Clark County as agreed to in the interlocal agreement.

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CHAPTER 20.225
SUMMARY OF LAND USE PERMITS

Sections:

20.225.010 Purpose.

20.225.020 Summary.

20.225.010 Purpose.

Purpose. The purpose of this chapter is to provide a summary of all land use permits in this title in alphabetical order to provide the user information about procedure type and approval criteria.

20.225.020 Summary.

Summary. A summary of permits is provided in Table 20.225.020-1 below. All references refer to chapters and sections with the Vancouver Municipal Code (VMC).

Table 20.225.020-1. SUMMARY OF LAND USE PERMITS AND RELATED ACTIONS

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria	Other Development Regulations
Adult Entertainment siting	II	20.210.050	20.430	----
Annexation	IV	20.210.070	20.230.020	----
Binding Site Plan	II	20.210.050	20.330.020(B)	----
Boundary Adjustments	I	20.210.040	20.310.040	----
Conditional Use				

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria	Other Development Regulations
-Initial	III/HE	20.210.060	20.245.040	----
-Major Modification	III/HE	20.210.060	20.245.040	----
-Minor Modification	I	20.210.040	20.245.040	----
Critical Areas Permit				
-Statement of Exemption	I	20.210.040	20.720.030	
-Fish and Wildlife Habitat Conservation Areas	I, or same as development	20.210.040	20.720.060; 20.720.110	
-Frequently Flooded Areas	I, or same as development	20.210.040	20.720.060; 20.720.120	
-Geological Hazards	I, or same as development	20.210.040	20.720.060; 20.720.130	
-Wetlands	I, or same as development	20.210.040	20.720.060; 20.720.140	
-Minor Exceptions	II	20.210.050	20.720.060; 20.720.070	
-Reasonable Use Exceptions	III/HE	20.210.060	20.720.060; 20.720.080	

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria	Other Development Regulations
Design Review				
Site Plan Required	I/II	20.210.040, –.050	20.265.040	20.265
-Exempt from Site Plan Review	I	20.210.040	20.265.040	
Development Agreements				
-Concurrent w/ application	Same as development	Same as development	20.250	If applicable, 20.790
-Not concurrent w/ application	City Council	20.250.050	20.250	If applicable, 20.790
Escrow Agreements	I	20.210.040	20.450.001	----
Essential Public Facilities	III/HE	20.210.060	20.450.065	20.245
Manufactured Home Developments	III/HE Conditional Use	20.210.060	20.450.085	20.245
Master Plan				
-Initial plan 25 acres or less	II	20.210.050	20.260.040	----
-Initial plan greater than 25 acres	IV/PC	20.210.060	20.260.040	----

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria	Other Development Regulations
-Modification	I, II, III/HE	20.210.040, -.050, -.060	20.260.060	----
Nonconforming Status Confirmation	I	20.210.040	20.195	----
Public Facility Master Plans				
-Initial approval	III/HE	20.210.060	20.268.040(A)	----
-Subsequent approval -Detailed Master Plan -Concept Master Plan -Hybrid Master Plan	I II	20.210.040 20.210.050	20.268.050(A)	---- ---- ----
-Modification -Detailed/Hybrid Master Plan -Concept Master Plan	I, II, III/HE II, III/HE	20.210.040, -.050, -.060 20.210.040, -.050	20.268.050(A) 20.268.050(A)	----- -----
Signs	I	20.210.040	20.450.050	
Site Plan Review				

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria	Other Development Regulations
-New development or redevelopment	I/II	20.210.040 or 20.210.050	20.270.040 or 20.270.050	----
-Modifications not exceeding thresholds for Type II review at 20.270.020(B)(4)	I	20.210.040	20.270.050	----
- Modifications exceeding thresholds for Type II review at 20.270.020(B)(4)	II	20.210.050	20.270.050	
-Extension	I	20.210.040	20.270.030(D)	----
-Phasing Plan approval	I	20.210.040	20.270.030(E)	----
Subdivisions				
Lot Split	I	20.210.040	20.320.110	
Unit Lot Subdivision	II	20.210.050	20.320.100	
-Short Subdivisions	II	20.210.050	20.320.040	----
-Subdivisions	III/HE	20.210.060	20.320.040	----
-Phasing plan approval	I	20.210.040	20.320.020(C)	----

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria	Other Development Regulations
Extensions				
-One-year	I	20.210.040	20.320.020(D	----
-Two-year	II	20.210.050	20.320.020(D)	----
Temporary Uses				
-Seasonal or special events	I	20.210.040	20.430	----
-Unforeseen emergency situations	I	20.210.040	20.430	----
-Extension	I	20.210.040	20.430	----
Text/Map Amendments				
-Legislative	IV	20.210.070	20.285.040	----
Tree Removal Permit (On-site)				
-Tree Plan w/Site Plan Review	II	20.210.050	20.450.035	----
-Tree Plan w/o Site Plan Review	I	20.210.040	20.450.035	----
Variances				

Permit/ Action	Procedure Type	Procedural Requirements	Approval Criteria		Other Development Regulations
-Type I	I	20.210.040	20.290.040(A)		----
-Type II	II		20.210.050	20.290.040(B)	----
Wireless Communication Facilities					
-Conditional Uses	II, III/HE		20.210.050, -.060	20.450.085	20.245
-Setback reduction	I		20.210.040	20.450.085	----

KEY
Type I: Ministerial permits
Type II: Quasi-judicial permits/Planning Official (PO) decision
Type III/HE: Quasi-judicial permits/Hearing Examiner (HE) decision
Type III/PC: Quasi-judicial permits/Planning Commission (PC) decision
Type IV: Legislative

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CHAPTER 20.230
ANNEXATIONS

Sections:

20.230.010 Purpose.

20.230.020 Approval Process.

20.230.030 Comprehensive Land Use Plan.

20.230.010 Purpose.

Purpose. The purpose of this chapter is to identify the procedures applicable to annexations by the city.

20.230.020 Approval Process.

A. *Annexations by election method.* An annexation request may be initiated by the City Council or by petition of property owners requesting the matter be put to a vote pursuant to Sections 35.13.015 RCW through 35.13.120 RCW, as may be amended or re-codified from time to time.

B. *Annexations by petition method.* An annexation request may be initiated by petition method pursuant to Sections 35.13.125 RCW through 35.13.170 RCW, as may be amended or recodified from time to time.

C. *Other procedures.* All procedures of Chapter 35.13 RCW shall apply to annexations by the city.

20.230.030 Comprehensive Land Use Plan.

A. *Assignment of Comprehensive Plan and zoning designations.* Assigning City Comprehensive Plan and zoning designations to annexed areas may occur through one of the following processes:

1. Conversion. The city shall convert the County's Comprehensive Plan map and zoning designations to the city designations that are the most similar. The assignment of these designations shall occur automatically and concurrently with the annexation.

   Conversion table. Table 20.230.030-1 summarizes the conversion of the County's plan and zoning designations to city designations that are most similar.

TABLE 20.230.030-1. CONVERSION OF COUNTY PLAN AND ZONE DESIGNATIONS TO CITY ZONE DESIGNATIONS

Clark County Comprehensive Plan Designation	Clark County Zoning District	Most equivalent City of Vancouver Zoning District
Urban Low Density Residential	R1-20	Low Scale Neighborhood
	R1-10	
	R1-7.5	
	R1-6	
	R1-5	
Urban Medium Density Residential	R-24	Medium Scale Neighborhood
	R-36	Mixed Use Neighborhood
Urban High Density Residential	R-50	Mixed Use Neighborhood
Urban Medium Density Residential	OR-24	Mixed Use Neighborhood
	OR-36	
	OR-36	
Urban High Density Residential	OR-50	
	OR-50	
Commercial (C)	NC	Industrial/Employment
Commercial (C)	CC	
	CC	
General Commercial (C)	GC	
Mixed Use	MX	Mixed Use Neighborhood

Clark County Comprehensive Plan Designation	Clark County Zoning District	Most equivalent City of Vancouver Zoning District
Industrial (I)	OC	Industrial/Employment
Industrial (I)	BP	
Industrial (I)	IL	
Heavy Industrial	IH	Heavy Industrial
Airport	A	
All Categories – Except Mixed Use	U(niversity)	Institutional/Campus
Parks/Open Space P/OS	Parks/WL	Parks and Open Space or Natural Areas, as determined by City of Vancouver
Surface Mining Overlay	S	Heavy Industrial
Airport Environs Overlay	AE-1, AE-2	Pick from existing designations & zones based on footnote 1 below
Historic Preservation Overlay	Site Specific	

[1] Final determination to be based on a comprehensive land use plan meeting the requirements of VMC 20.230.030.C, or written findings that address existing uses, abutting uses, zone purpose, zone location criteria, allowed uses, and identify a zone designation that would allow desired existing uses, approved uses, or in-process development plans to continue as conforming uses.

2. *New comprehensive land use plan.* The Planning Commission and City Council may prepare a land use plan to become effective upon the annexation of any area which might reasonably be expected to be annexed by the City at any future time pursuant to the Type IV procedures contained in Section 20.285.070 VMC. To the extent deemed reasonably necessary by the City to be in the interest of health, safety, and the general welfare, the Review Authority may provide, among other things, for:

    a. The regulation and restriction of building types, uses, development standards, design and open space requirements, subdivision process and allowances, and additional provisions of the Vancouver Municipal Code as applicable.

b. The division of the area to be annexed into districts or zones of any size or shape, and within such districts or zones regulate and restrict the erection, construction, reconstruction, alteration, repair or use of buildings, structures or land; and

c. The time interval following an annexation during which the ordinance or resolution adopting any such plan or regulations, or any part thereof must remain in effect before it may be amended, supplemented or modified by subsequent ordinance or resolution adopted by the City.

B. *Objectives of regulations and restrictions.* All such regulations and restrictions shall be designed, among other things, to encourage the most appropriate use of land throughout the area to be annexed; coordinate future development; protect health and safety; promote access and mobility; conserve and restore natural resources and systems; and to facilitate adequate provision of public facilities and services.

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CHAPTER 20.245
CONDITIONAL USE PERMITS

Sections:

20.245.010 Purpose.

20.245.020 Approval Process.

20.245.030 Submission Requirements.

20.245.040 Approval Criteria.

20.245.050 Appeals.

20.245.060 Revocation of Conditional Use Permits.

20.245.070 Limitation on New Applications.

20.245.010 Purpose.

General. In many zones there are uses that may be compatible but because of their size, operating characteristics and/or potential off-site impacts warrant review on a case-by-case basis. The purpose of the conditional use review process is to determine if the use is appropriate at the proposed location and, if appropriate, to identify any additional conditions of approval necessary to mitigate potentially adverse impacts.

20.245.020 Approval Process.

A. *Initial applications.* A request for approval for a new conditional use shall be processed as a Type III procedure, using approval criteria contained in Section 20.245.040 VMC and subject to other requirements in this Chapter.

B. *Major modification of an approved or existing conditional use*.

1. The Planning Official shall determine that a major modification(s) has resulted if one or more of the changes listed below have been proposed:

a. A change of any applicable condition of approval;

b. A change in use classification as defined in Chapter 20.160 VMC;

c. A 10 percent increase in dwelling unit density, providing the proposed density does not exceed the maximum density established in the underlying base zoning district;

d. An increase in the approved floor area proposed for nonresidential use by more than 25 percent, except for schools, which shall have a threshold of 50 percent increase in floor area;

e. A change in the operational use deemed to be a possible adverse impact to adjacent properties by the Planning Official.

2. Upon the Planning Official determining that the proposed modification to the conditional use plan is a major modification, the applicant shall submit a new application to be processed as a Type II application, pursuant to Section 20.210.050 VMC.

C. *Minor modification of approved or existing conditional use*.

1. Any modification that is not within the description of a major modification as provided in Subsection (B)(2) above shall be considered a minor modification.

2. An applicant shall request approval of a minor modification by means of a Type I procedure, Section 20.210.040 VMC, using approval criteria in Subsection (3) below.

3. A minor modification shall be approved, approved with conditions, or denied following the Planning Official's review based on the findings that the proposed development is in compliance with all applicable requirements of this Title.

D. *Time Limit of Approval*.

1. *Time Limit.* Authorization of a conditional use permit shall be void after five years, unless a building permit has been issued and substantial construction has taken place.

2. *Extension.* Upon written request by the applicant and payment of the required fee pursuant to Chapter 20.190 VMC, the Planning Official may extend the authorization for a maximum of one year.

E. *Concurrent review.* An applicant may request other land use reviews, such as a variance or site plan review, at the same time that a request for conditional use approval is submitted. The applications for multiple reviews may be consolidated. The review procedure for consolidated applications shall be that of the application requiring the highest level of review, under Section 20.210.020(D) VMC.

20.245.030 Submission Requirements.

A. *Submission requirements.* The applicant must submit a completed application form as prescribed by the Planning Official with applicable fee per Chapter 20.190 VMC, containing the following information:

1. Narrative describing the proposed uses for the site, hours of operation, hours and the frequency of deliveries, and construction schedule.

2. Drawn to scale site plan, legible for digital reproduction, showing accurate representation of the size and shape of the parcel(s), including easements of any kind, all dimensions, and parcel orientation. Include north arrow.
3. Locations, dimensions, and height of all existing and proposed buildings and structures, including garages, carports, decks, patio covers, and other accessory structures. Include dimensions from each other and from all property lines. Show dimensions from each other and from all property lines. Show dimension of eaves projecting beyond a wall or supporting post. Indicate usage of all structures.
4. Location, height, and material of fences, buffers, berms, walls, and other proposed screening. Note the location and dimensions of area of terraces, decks, shelters, and play areas.
5. *Lighting plan*. This plan shall show all proposed fixtures on site and within rights-of-way. Show all existing above and underground power lines. (This plan will be routed to Clark County PUD by a city workgroup for comments and compliance with standards.)
6. Location and detailed layout of vehicle access, site circulation, off-street parking and loading areas, lighting, landscaping, and buffering as required by Chapter 20.450 VMC. Include accessible parking stalls and disembarking areas, accessible route of travel, proposed ramp, and signage, as required by the most current version of the Washington Administrative Code governing accessibility for disabled persons. Include location and screening for proposed storage areas for solid waste, including recyclable materials and organics.
7. Summary table which includes parcel zone, total site area, gross floor area by use (e.g., manufacturing, office, retail, storage), itemized number of full size, compact and accessible parking stalls and the collective total number, total lot coverage proposed, and amount of landscaped area.
8. *Certified mailing list.* Current Clark County assessor map(s) showing the property(ies) within a 300-foot radius of the site, per the requirements in VMC 20.210.050 and 20.210.060, decision-making procedures, and one set of stamped and addressed envelopes and one set of mailing labels with the names and addresses of owners of all properties within the 300-foot radius. Such list shall be certified as accurate and complete by the Clark County assessor or a title company. For non-owner-occupied properties, provide one set of stamped and addressed envelopes and one set of mailing labels addressed to “occupant” as can be determined from available county assessor records.
9. Floor plan showing the gross square footage of each structure and outdoor activity area proposed on the site, including existing structures and outdoor activity areas to be retained. Include a description of the proposed uses of each structure or portions of a structure and each outdoor activity area. Include location of aboveground utilities and typical elevation drawings of each structure.

10. Completed SEPA (State Environmental Policy Act) checklist (as required), on city-provided form. Include SEPA processing fee, pursuant to Chapter 20.190 VMC, Fees.
11. Required processing fee for conditional use permit (see Chapter 20.190 VMC).
12. Concurrency letter, addressed to transportation manager, with summary of project with projected traffic impacts and appropriate fee. (See Chapter 20.190 VMC.)
13. Any information deemed necessary to address mitigation for the specific development circumstances.

20.245.040 Approval Criteria.

A. *Approval standards.* The Hearing Examiner shall approve, approve with conditions, or deny an application for a conditional use or to enlarge or alter a conditional use based on findings of fact with respect to each of the following criteria:

1. The site size and dimensions provide adequate area for the needs of the proposed use;
2. The impacts of the proposed use of the site can be accommodated considering size, shape, location, topography and natural features;
3. All required public facilities have adequate capacity to serve the proposed development;
4. The applicable requirements of the zoning district, and other applicable documents are met except as amended by the conditional use permit or variances requested pursuant to Chapter 20.290 VMC; and
5. Identified impacts on adjacent properties, surrounding uses and public facilities have been adequately mitigated.

B. *Conditions of approval.* The Hearing Examiner may impose conditions on the approval of a conditional use in addition to or above and beyond those required elsewhere in this Title, which are found necessary to ensure the use is compatible with other uses in the vicinity. These conditions may include, but are not limited to the following:

1. Limiting the hours, days, place and/or manner of operation;
2. Requiring design features which minimize environmental impacts such as noise, vibration, air, pollution, glare, odor and/or dust;
3. Requiring additional setback areas, lot area and/or lot depth or width;
4. Limiting the building height, size or lot coverage, and/or location on the site;
5. Designating the size, number, location and/or design of vehicle access points;
6. Requiring street right-of-way to be dedicated and street(s) to be improved;

7. Requiring additional landscaping, screening, drainage and/or surfacing of parking and loading areas;
8. Limiting the number, size, location, height and/or lighting of signs;
9. Limiting or setting standards for the location and/or intensity of outdoor lighting;
10. Requiring berms, screening or landscaping and the establishment of standards for their installation and maintenance;
11. Requiring and designating the size, height, location and/or materials for fences;
12. Requiring the protection and preservation of existing trees, soils, vegetation, watercourses, habitat areas and/or drainage areas;
13. Requiring the construction of pedestrian/bicycle pathways in accordance with the adopted pedestrian/bicycle pathway plan.

20.245.050 Appeals.

The appeal procedures are set forth in Chapter 20.210.130. Parties with standing to appeal per 20.210.130 may appeal a decision of the Hearing Examiner to the City Council.

20.245.060 Revocation of Conditional Use Permits.

It shall be unlawful and punishable for any person to violate any condition imposed by a conditional use permit. The Hearing Examiner may revoke any conditional use permit for noncompliance with conditions imposed in the granting of the permit after first holding a public hearing and giving notice of such hearing as provided in Section 20.210.120 VMC.

20.245.070 Limitation on New Applications.

In a case where an application is denied by the Hearing Examiner, or denied by the City Council on appeal from the Hearing Examiner, unless specifically stated to be without prejudice, it shall not be eligible to be resubmitted for a period of 1 year from the date of the denial, unless, in the opinion of the Planning Official, new evidence is submitted showing that conditions have changed to an extent that further consideration is warranted. Reconsideration of an application shall be subject to the same fee as a continuance per Chapter 20.190 VMC, Fees.

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CHAPTER 20.250
DEVELOPMENT AGREEMENTS

Sections:

20.250.010 Development Agreements Authorized

20.250.020 Purpose and Limitations

20.250.030 Pre-existing Agreements

20.250.040 Effect and Vesting

20.250.050 Procedure

20.250.060 Term of Agreement

20.250.070 Recording

20.250.010 Development Agreements Authorized

A. *Property within city limits.* The City may enter into a development agreement pursuant to this Chapter 20.250 VMC and Sections 36.70B.170 RCW et seq., with a person having ownership or control of real property within its jurisdiction.

1. *Property outside city limits.* The City may enter into a development agreement pursuant to this Chapter 20.250 VMC and Sections 36.70B.170 RCW et seq., with a person having ownership or control of real property outside of its boundaries as part of a proposed annexation or service agreement.

2. *Nature of City action.* The execution of a development agreement in and of itself is an administrative act, as opposed to a quasi-judicial or a legislative act, and is a proper exercise of the City's police power and contract authority.

20.250.020 Purpose and Limitations

A. *Contents.* Where applicable, development agreements shall set forth the development standards and other provisions that shall apply to and govern and vest the development, use, and mitigation of the development of the real property for the duration specified in the agreement. A development agreement shall be consistent with all applicable development regulations. A development agreement may obligate a party to fund or provide services, infrastructure, or other facilities. For the purposes of this Section, "development standards" include, but are not limited to:

1. Project elements such as permitted uses, residential densities, and nonresidential densities and intensities or building sizes;
2. The amount and payment of impact fees imposed or agreed to in accordance with any applicable provisions of State law, any reimbursement provisions, other financial contributions by the property owner, inspection fees, or dedications;
3. Mitigation measures, development conditions, and other requirements under Chapter 20.740 VMC, SEPA Regulations;
4. Design standards such as maximum heights, setbacks, drainage and water quality requirements, landscaping and other development features;
5. Affordable housing;
    a. Parks and open space preservation;
    b. Phasing;
    c. Review procedures and standards for implementing decisions;
    d. A build-out or vesting period for applicable standards; and
    e. Any other appropriate development requirement or procedure.

B. *Expectation of Public Benefit.* City Council shall consider the relative public benefits from the proposed agreement and may approve or deny a proposed development agreement based on the proportionality of expected benefits to the public and to the development project or property.

C. *Unauthorized fees prohibited.* Nothing in this Chapter is intended to authorize the City to impose impact fees, inspection fees, or dedications or to require any other financial contributions or mitigation measures except as expressly authorized by other applicable provisions of law.

20.250.030 Pre-Existing Agreements

General. Nothing in this Chapter affects the validity of a contract rezone, concomitant agreement, annexation agreement, or other agreement in existence on June 1, 2026, or any agreement adopted at any time under separate authority, that includes some or all of the development standards provided in Section 20.250.020 VMC. Nothing in this Chapter affects the applicability of any State or Federal law or regulation.

20.250.040 Effect and Vesting.

A. *General.* Unless amended or terminated, a development agreement is enforceable during its term by a party to the agreement. A development agreement and the development standards in the agreement govern during the term of the agreement, or for all or that part of the build-out period of the project specified in the agreement, and the project may not be subject to an amendment to a zoning ordinance or development standard or regulation or a new zoning ordinance or development standard or regulation adopted after the effective date of the agreement. A permit or approval issued by the City after the execution of the development agreement must be consistent with the development agreement. A development agreement shall reference by ordinance or code provision the land use regulations under which the project described in the development agreement is vested.

1. *Vesting.* Under subsection (A), a development agreement provides an alternative to vesting rights provided for under Section 20.210.110 VMC.

2. *Concurrency.* A development agreement may reserve capacity in the transportation system for the proposed development's trip generation and, in such case, the proposed development shall be deemed to have achieved transportation concurrency under the concurrency rules and regulations in effect on the effective date of the development agreement. The term for the concurrency determination shall be set forth in the development agreement.

3. *Modifications.* The City shall reserve authority in each development agreement to impose new or different regulations only if necessary, and to the extent necessary, to address a serious threat to public health and safety.

20.250.050 Procedure.

A. *Initiation*. A request for approval of a development agreement may be initiated by a person having ownership or control of real property or the City. The review fee per Chapter 20.190 VMC shall be paid by the requesting party at the time of submission of the request. In the case of a development agreement requested by both the City and a person having ownership or control of real property, the fee may be split between the parties.

1. *Approval process for agreement not associated with a land use application.* If a development agreement is not proposed in conjunction with a Type II, III or IV land use application under Chapter 20.210 VMC, the development agreement shall be presented to City Council at a public hearing for approval by ordinance or resolution pursuant to the public hearing procedures of Section 20.210.120 VMC.

2. *Approval process for agreement associated with a Type II, III or IV land use application.* If a development agreement is proposed in conjunction with a Type II, III or IV land use application under Chapter 20.210 VMC, Decision-Making Procedures, the development agreement shall be presented to City Council at a public hearing for approval by ordinance or resolution, after approval of the Type II or III application or after Planning Commission action on a Type IV application. The review body for the Type II, III or IV application shall not make a recommendation on that portion of the application related to the development agreement to City Council. If no appeal is filed on the underlying land use application, the Planning Official shall send written notice of the public hearing at least 10 days prior to City Council consideration of the development agreement to all parties entitled to a Notice of Decision for the applicable application under Section 20.210.050(I) VMC or 20.210.120(B)(11) VMC.
3. *Appeal.* As an exception to the appeal procedures of Section 20.210.130 VMC, any appeal of a Type II or III application processed together with a development agreement shall be heard by the City Council in conjunction with Council's consideration of the development agreement. Notice of the appeal hearing shall be sent to all persons entitled to notice of the appeal hearing under Section 20.210.130 VMC.
4. *Further appeals.* Further appeals after final action by City Council of a Type II or III application processed in conjunction with a development agreement shall be governed by Section 20.210.130(D)(1) VMC. Further appeals, after final action by City Council of a Type IV application processed in conjunction with a development agreement shall also be governed by Section 20.210.130(D)(1) VMC.

20.260.060 Term of Agreement.

The development agreement shall set forth the term of approval as agreed to by the parties. Development agreements may not be approved for more than ten (10) years initially, however a party to an approved development agreement may request subsequent Council approval of an extension of an unexpired agreement by up to five (5) years, provided substantial progress toward fulfilling the terms of the agreement have been demonstrated.

20.260.070 Recording.

General. Within 30 days after approval by City Council, the requestor shall ensure that the signed development agreement is recorded with the real property records office of Clark County. Requestor shall be responsible for payment of any recording fee and transmitting a copy of the recorded agreement to the City Manager's Office at 415 W. 6th Street, Vancouver, WA 98660.

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CHAPTER 20.255
INTERPRETATIONS AND MINOR ADJUSTMENTS

Sections:

20.255.010 Purpose and Responsibility.

20.255.020 Procedure.

20.255.030 Rules of Construction.

20.255.040 Minor Adjustments.

20.255.010 Purpose and Responsibility.

A. *Purpose.* The purpose of this Chapter to provide a process for interpreting and applying the provisions of Title 20 VMC.

B. *Responsibility.* It shall be the responsibility of the Planning Official to review and resolve any questions regarding the proper interpretation or application of the provisions of Title 20 VMC pursuant to the procedures set forth in this Chapter. The Planning Official's decision shall be in keeping with the spirit and intent of this title and of the Comprehensive Plan. The Planning Official's decision shall be in writing and kept on permanent file.

20.255.020 Procedure.

A. *Application.* Any person may request in writing the Planning Official's interpretation of a code provision of Title 20 VMC when it pertains to a specific property or project by means of a Type I application pursuant to Section 20.210.040 VMC. The Planning Official may independently initiate an interpretation of any conflicting or unclear provisions of this Title.

B. *Multiple applications.* If an application for an interpretation is associated with any land use application(s) subject to Title 20 VMC, then the application for the interpretation may be combined with the associated application(s) and is subject to the highest level of procedure that applies to any of the applications, Section 20.210.020(D) VMC.

C. *Codification.* To ensure that Planning Official interpretations are applied consistently over time, the Planning Official shall on an annual basis initiate a Type IV text amendment to this Code for the purpose of codifying interpretations pursuant to Chapter 20.210 VMC, Text and Map Amendments. The codified interpretations shall be located in Section 20.450.015 VMC, Exceptions and Interpretations, or in the Chapter of the Code governing the subject matter of the interpretation, whichever may be more appropriate.

D. *Appeals.* Any official interpretation of the provisions of Title 20 VMC may be appealed by any aggrieved party, pursuant to the appeal procedures set forth in Section 20.210.130.

20.255.030 Rules of Construction.

Guiding principles. In interpreting Title 20 VMC, either when an application is filed under this Chapter or when any application is filed under Chapter 20.210 VMC, Decision-Making Procedures, the Planning Official shall adhere to the following rules of construction in interpreting and applying the Code:

A. *Meaning.* All words used in the Code shall have their normal and customary meaning, unless specifically defined in this Code.

B. *Tense.* Words used in the present tense include the future tense.

C. *Plural.* The plural includes the singular and vice versa.

D. *Mandatory.* The words will and shall are mandatory.

E. *Permissive.* The word may is permissive.

F. *Context.* In determining the meaning of a word as used in the Code, regard shall be made for the context in which the word is used.

G. *Specification.* General terms which follow specific terms are limited to matters similar to those specified.

H. *Exclusion.* Express mention of one thing implies exclusion of another.

I. *Antecedent.* A qualifying phrase refers back both grammatically and legally to the last antecedent.

J. *Conjunctions.* The word or is not to be construed as and.

K. *Superfluous words.* No clause or individual words of the Code should be deemed superfluous.

L. *Binding case law.* Other applicable rules of construction employed by Washington appellate courts in interpreting legislative enactments shall apply.

20.255.040 Minor Adjustments.

A. *Purpose.* Each area of land is, to some degree, unique as to its suitability for and constraints on development. Development standards and procedures imposed under this zoning code cannot foresee all conceivable situations peculiar to the development of every property at every moment, but are designed as standards applicable to most situations. It is the intent of the adjustment to provide flexibility, adaptability, and reasonableness in the application and administration of this Title where special conditions exist and the strict application of the standard or procedure would not serve a public purpose.

B. *Planning Official Authority.* In the event the strict application of a development standard or procedural requirement of this Title would result in unforeseen consequences or an excessive burden given the nature of the proposed development, the Planning Official is authorized to make a minor adjustment in said standard or procedure, upon making a written finding that no person of average sensibilities would be negatively impacted by such an adjustment, and that said adjustment would be consistent with the spirit and intent of this title and the Comprehensive Plan. No adjustment shall allow a use not otherwise permitted for the subject property, nor shall a minor adjustment be used in place of a variance procedure, where applicable. The Planning Official shall maintain a record of such decisions and associated findings, and periodically forward them to the Planning Commission for their information.

C. *Appeal.* Any minor adjustment issued pursuant to this Chapter may be appealed by any aggrieved party, pursuant to the appeal procedures set forth in Section 20.210.130.

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CHAPTER 20.260
MASTER PLANS

Sections:

20.260.010 Purpose.

20.260.020 Types of Master Plans

20.260.030 Applicability.

20.260.040 Development Standards.

20.260.050 Approval Criteria.

20.260.060 Approval Process.

20.260.070 Modification Process.

20.260.080 Submittal Requirements.

20.260.090 Vesting.

20.260.100 Term.

20.260.010 Purpose.

Master planning is intended to provide for the coordinated and integrated development of multiple buildings and land uses within a site. Master planning facilitates the efficient use of land and public services, promotes human interaction and a sense of place, creates safe, attractive, and convenient environments, and expands development opportunities.

The purpose of this chapter is to:

A. Promote the cohesive planning of larger development sites that may develop in phases under the same set of development regulations;

B. Promote the preservation and sensitive treatment of significant natural features, including vegetation, waterways, views, and viewsheds;

C. Provide and maintain usable open spaces for the benefit of residents, employees, and patrons;

D. Encourage a compatible and integrated mix of building types, including mixed-use development and ground-oriented residential buildings;

E. Promote efficient street and circulation layouts, including the use of complete streets that accommodate pedestrians, bicyclists, transit, utilities, and related infrastructure;

F. Promote sustainable and environmentally responsible development through innovative building design, energy and water conservation, and low-impact development practices; and

G. Provide appropriate buffering and transitions between potentially incompatible land uses.

20.260.020 Types of Master Plans

A. *Detailed master plan.* A detailed master plan is one in which the initial and subsequent phases of development are described in substantial detail including the size, location and use of specific buildings; location of pedestrian/vehicular circulation; size and location of parking facilities; projection of existing and future infrastructure capacity and demand; and architectural and landscaping design standards and materials. If change to an approved project or phase is necessary, additional review is required, the extent of which is to be determined by the magnitude of the change. Therefore, the detailed master plan offers substantial certainty but less flexibility.

B. *Concept master plan.* A concept master plan is one in which the applicant gets initial approval of the concept of development by identifying a series of "building envelopes." Within each building envelope the range of primary and secondary uses; total gross area of development; total number of vehicular trips and parking space; infrastructure requirements; and other off-site impacts are estimated but without identifying the exact size, location and design of specific buildings. The concept plan also contains overall site design and development standards and architectural/landscaping principles and materials. At the time a specific building or phase is to be constructed, the applicant must request a land use review to provide the specific information not previously available and to ensure that the proposal is in keeping with the initially approved concept. A concept master plan offers substantial flexibility to alter specific buildings up until the time they are constructed while reducing the amount of information needed at the time since a substantial proportion of the development already has been approved. Thus, this option offers substantial flexibility but less certainty.

C. *Hybrid master plan.* In the hybrid master plan, the applicant provides a detailed master plan of the initial and one or more subsequent phases of development, so as to get approvals for several projects at once, but requests only conceptual approval for later phases, where there currently is inadequate information to project future applicant needs and mitigation measures. This option offers a balance of certainty and flexibility.

20.260.030 Applicability.

In the Regional Activity Center (RA) and the Mixed-Use Neighborhood (MX) districts, developments consisting of ten (10) acres or more in size shall be processed as a master plan. In any base zoning district, developments five (5) acres or greater in size may, but are not required to, opt into master planning.

20.260.040 Development Standards.

A. Uses. Uses shall be allowed as per Chapter 20.430 VMC in the base zoning in which the property to be master planned is located.

B. Building Types. Building Types shall be allowed as per Chapter 20.430 VMC in the base zoning in which the property to be master planned is located. Additional Building Types shall be allowed as long as the base zoning minimum density is met.

C. Mix of Uses.

1. At least 20% of the combined gross floor area of the buildings proposed on the site shall be devoted to residential uses, and at least 20% to nonresidential uses. Parking garages or portions of garages devoted to residential or nonresidential uses may be counted towards this requirement, but surface parking may not.

2. For sites with existing development that is functionally integrated into the master plan, the gross square footage of existing development that is to remain as part of the master plan development shall count towards the mix of uses requirement.

3. For phased projects, the mix of residential and non-residential uses may vary from the mix of use standards by phase, provided the overall mix of uses within the master plan meets the mix of uses on full build out.

D. *Functional integration of uses.* Land uses in master plan sites shall be selected and designed to encourage interaction among uses. Examples include but are not limited to commercial developments that create consistent and diverse foot traffic from on-site or adjacent residents, workers and visitors.

E. *Physical integration of uses.* All buildings and improvements on the site shall be located and designed to function as an integrated development and to encourage pedestrian travel between buildings and uses.

1. Separate buildings shall be connected through pedestrian linkages delineated through landscaping, differentiated surface materials or texture. Delineation through striping alone shall not be considered sufficient.

2. One or more similar design characteristics among separate structures shall be provided, including but not limited to similar or complimentary building facades, surface materials, colors, landscaping, or signage.

F. One or more outdoor publicly accessible features shall be provided to encourage interaction among residents or users of the site, including but not limited to courtyards, delineated gathering spaces, or seating areas. These areas may be paved and/or landscaped, and shall comprise at least 10% of the total site area and be centrally located within the site to fullest extent possible.

G. *Frontage standards*. Buildings shall be placed to encourage pedestrian activity within and along the site. No more than 50% of each site frontage along arterial or collector streets shall be devoted to off-street parking or vehicular access. Portions of site frontages devoted to off-street parking or access shall include design features such as landscaping or screening so as to maintain visual continuity of the street and sidewalk to the fullest extent possible.

H. Master plans in excess of 25 acres with the Urban Mixed Use comprehensive plan designation may establish alternative development standards as part of the master planning process, provided such standards meet the intent of the applicable comprehensive plan policies for the Urban Mixed-Use designation.

I. *Underlying Zoning District*. As part of the master planning process, the underlying base zoning boundaries can be amended.

20.260.050 Approval Criteria.

A. To receive approval for a master plan, the applicant shall demonstrate compliance with all of the following criteria:

1. *Content.* The master plan contains all of the components required in Section 20.260.060. Compliance with all applicable standards. The proposed development and uses comply with all applicable standards of the Title, except where adjustments are being approved as part of the master plan application, pursuant to Section 20.260.040B.

2. *Architectural and site design.* The proposed development demonstrates the use of innovative, aesthetic, energy-efficient and environmentally-friendly architectural and site design.

3. *Transportation system capacity.* There is either sufficient capacity in the transportation system to safely support the development proposed in all future phases or there will be adequate capacity by the time each phase of development is completed.

4. *Availability of public services.* There is either sufficient capacity within public facilities and services to adequately serve the development proposed in all future phases, or there will be adequate capacity available by the time each phase of development is completed.

5. *Protection of designated resources.* City-designated resources such as historic landmarks, significant trees and sensitive natural resources are protected in compliance with the standards in this and other Titles of the VMC.

6. *Compatibility with adjacent uses.* The concept plan contains design, landscaping, parking/traffic management and multi-modal transportation elements that limit conflicts between the master plan and adjacent uses.

7. *Mitigation of off-site impacts.* All potential off-site impacts including litter, noise, shading, glare and traffic, will be identified and mitigated to the extent practicable. For phased master plans, mitigations appropriate to the impact of individual phases shall be tied to each relevant phase.

B. *Adjustment approval criteria.* Adjustments to numerical development standards may be processed as part of the request for master plan approval if the applicant demonstrates compliance with all of the following approval criteria:

1. The adjustment(s) is warranted given site conditions and/or characteristics of the design.
2. The benefits accruing from the implementation of the adjustment outweigh any potential adverse impacts.
3. Any impacts resulting from the adjustment are mitigated to the extent practical.

20.260.060 Approval Process.

A. *Initial Approval*. In the Regional Activity Center (RA) and Mixed-Use Neighborhood (MX) zoned sites, developments twenty-five (25) acres or greater shall be reviewed as a Type IV application with the initial review by the Planning Commission and final review by the City Council. Master plans in any zone on properties less than twenty-five (25) acres shall be reviewed as a Type II application.

B. *Subsequent phases*. The type of development review required for subsequent phases of a master plan for which initial approval has been obtained depends on the type of master plan selected.

20.260.070 Modification Process.

A. The type of approval process required to address requested modifications of an approved master plan depends upon the magnitude of the proposed change. Modifications to approved master plans shall demonstrate compliance with the approval criteria contained in 20.260.050.A. Modifications include requests to add, remove or change any aspect of the approved master plan.

1. *Allowed without subsequent review.* The following improvements do not require subsequent land use review and are allowed upon issuance of a building permit, if required:
    a. Interior improvements.
    b. Exterior improvements associated with existing buildings that do not involve an expansion of floor area, subject to all applicable base zone development and design standards, as modified in the initial plan approval, and relevant conditions of approval.
    c. Installation of new or modification of existing mechanical or electrical equipment, subject to all applicable base zone development and design standards, as modified in the initial master plan approval, and relevant conditions of approval.
    d. Maintenance of existing facilities, when a building permit is required.

2. *Type I procedure.* The following modifications shall be reviewed by means of a Type I review, using procedures contained in Section 20.210.040 VMC:

    a. Modification of the location of an approved building or building addition, providing the modification complies with the applicable base zone development and design standards, as modified in the initial master plan approval, and all relevant conditions of approval.

    b. Modification of use or design and development standards including architecture, landscape architecture, pedestrian and bicycle facilities; signs and/or lighting elements approved in the initial plan.

    c. A new building of any size in any location that replaces a building approved but not constructed, providing there is: 1) no net increase in total building coverage, and 2) compliance with the applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval.

    d. New buildings or building additions up to 10,000 gsf not anticipated and, therefore, not contained in the initial master plan approval, except in locations within 100' of the master plan boundary abutting residentially-zoned property, in which case such new buildings or building additions shall not exceed 3,000 gsf, providing the modification complies with the applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval. Under this provision, new construction of such unanticipated buildings or building additions shall not exceed 10,000 gsf in any one year, and shall not exceed 30,000 gsf in any four years. As part of the Type I review, the applicant shall provide information on the amount of floor area built to-date for the year in which the application is submitted, and the amount of floor area built within the four-year period preceding the request.

    e. An increase of up to 10% in the total number of total number of parking spaces approved in the initial master plan approval.

3. *Type II review.* The following modifications shall be reviewed by means of a Type II review, using procedures contained in Section 20.210.050 VMC.

    a. A change in the approved master plan boundary resulting in the exchange of properties where the total amount of land in the approved boundary remains the same or is decreased.

b. New building or building addition exceeding 10,000 gsf but less than 50,000 gsf, not anticipated and, therefore, not contained in the initial master plan approval, located more than 100' from the campus boundary abutting residentially-zoned property. The request must comply with the applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval. For new buildings or building additions exceeding 25,000 gsf under this provision, the applicant shall provide traffic and parking analyses of the proposal as part of the Type II application.

c. New building or building addition exceeding 3,000 gsf but less than 25,000 gsf, not anticipated and, therefore, not contained in the initial master plan approval, located within 100' of the campus boundary abutting residentially-zoned property. The request must comply with all applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval.

d. An increase of more than 10% in the total number of parking spaces approved in the initial master plan approval.

4. *Type III review*. The following modifications shall be reviewed by means of a Type III review unless the original approval was a Type II review in which case the modifications shall be reviewed as a Type II review, using procedures contained in Section 20.210.060 VMC.

   a. New building or building additions of 50,000 gsf or more, not anticipated and, therefore, not contained in the initial master plan approval, except within 100' of the master plan boundary abutting residentially-zoned property where this review shall be required for new buildings or building additions that exceed 25,000 gsf.

   b. Proposals that result in a cumulative increase of over 10% of total building floor area contained in the initial master plan approval.

5. *Type IV review.* The following modifications shall be reviewed by means of a Type IV review unless the original approval was a Type II review in which case the modifications shall be reviewed as a Type II review, using procedures contained in Section 20.210.060 VMC.

   a. Expansion of the originally approved boundary beyond that contained in the initial master plan approval.

   b. A proposed use or development that was denied in the initial master plan approval.

B. *Concurrent review.* An applicant may submit applications for initial review and one or more subsequent phases of development concurrently.

20.260.080 Submittal Requirements.

An application for a master plan development shall contain the following information related to existing conditions on the site, presented in narrative, tabular and/or graphic formats. The level of detail of the master plan submittal is dependent and may vary upon the type of master plan being submitted (detailed, conceptual and hybrid).

A. *Existing conditions plan.* An existing conditions plan shall include the following information:

1. A vicinity map showing streets and access points, pedestrian and bicycle pathways, transit stops and utility locations within a given radius of the site.
2. The site size, dimensions and orientation relative to North.
3. The location, name and dimensions of all streets adjoining the site indicating whether privately or publicly owned.
4. The location of existing structures and other improvements on the site, including structures, driveways, parking, loading, pedestrian and bicycle paths, passive or active recreational facilities or open space, and utilities.
5. Elevation of the site at two-foot contour intervals for grades zero percent to 10 percent and at five-foot contour intervals for grades more than 10 percent.
6. The approximate location of significant natural conditions, such as:
    a. The 100-year floodplain.
    b. The location of drainage patterns and drainage courses.
    c. Slopes in excess of 15 percent.
    d. Unstable ground, e.g., land subject to slumping, slides or movement.
    e. High seasonal water table or impermeable soils.
    f. Areas having severe soil erosion potential.
    g. Areas having severe weak foundation soils.
    h. Significant wildlife habitat or vegetation.
    i. Rock outcroppings.

B. Detailed description of the transportation system within and adjacent to the site including:

1. Street classification of all internal and adjacent streets.
2. Transit service availability.

3. Baseline traffic impact study prepared by a licensed engineer to include information as required by the City's Traffic Engineer.

C. Analysis of existing infrastructure capacity on and in the vicinity of the site.

D. SEPA checklist.

E. Applicable review fees.

F. *Proposed development plan.* Description of all proposed development within the master plan development, presented in narrative, tabular and graphic formats:

1. *Underlying zoning district boundaries.* If these are shifted around the site as permitted by Section 20.260.030, the existing and proposed configuration of zoning districts shall be illustrated.

2. Description of the mix of uses, including number of units and/or total gross square feet devoted to each, and approximate location on the site.

3. All other site improvements including the approximate size and location of walls, barriers and fences; surface and structured parking facilities; bicycle parking facilities; on-site pedestrian, transit and vehicular circulation; transit stops and pedestrian/transit amenities; and open space and landscaped areas.

4. The conceptual location of new and/or expanded existing public and private infrastructure including water, sanitary sewer, stormwater management facilities; and electrical, telephone and data transmission lines. This includes wireless telecommunications facilities.

G. Phasing plan for implementation of the proposed development.

H. Summary of development intensity at full build-out including lot coverage.

I. Summary of transportation facilities including:

1. Traffic impact study prepared by a licensed engineer that describes traffic impacts associated with each phase of development and at full build-out of the project, and a plan for accommodating this traffic in compliance with Title 11. The specific content of the traffic impact study shall be determined by the City' s Traffic Engineer.

2. Parking impact study describing the parking demand associated with each phase of the development and at full build-out of the project, and a mitigation plan for accommodating parking demand on the site.

3. Concurrent or proposed street vacations, with a description of potential parking and traffic/pedestrian impacts, if any, and appropriated measures to mitigate these impacts.

J. Plan for protecting designated environmental, historic/cultural and open space resources.

K. Design standards that will govern the orientation and design of buildings and other improvements include but are not limited to the following.

1. Architecture, including design standards and building materials board(s), for buildings, fences, walls and other structures.
2. Landscaping, including design standards and standard plant list. Native plant materials are preferred.
3. Pedestrian circulation, including development standards, amenities and materials.
4. Bicycle parking facilities, including specifications.
5. Signs.
6. Lighting.

20.260.090 Vesting.

A. *Applicability.* A master plan shall be reviewed under this chapter and the zoning, development and other land use control ordinances contained in the Vancouver Municipal Code and any uncodified ordinances modifying the same, in effect on the date a master plan application has been deemed fully complete by the city. For the purposes of this section, a vested master plan application shall mean that the applicant is entitled to implement the master plan, or any portion of it, described in the application, under the zoning, development and land use ordinances applied by the city in its review of the master plan application. An application shall be vested for the term of the master plan as governed by Section 20.260.090 VMC.

B. *Subsequent Regulations.* An applicant may have the option of subjecting its development to any subsequently enacted land use ordinances. However, should an applicant choose to subject its development to a subsequently enacted land use ordinance, this shall have the effect of subjecting the development to all land use ordinances enacted after the application is vested, unless the city and applicant agree otherwise. In order for the Planning Official to grant such a request, the applicant must demonstrate how later enacted ordinance(s) will benefit both the project and the city while maintaining consistency with the comprehensive plan. Applicant must also demonstrate that use of later enacted ordinances will not conflict with other ordinances the development remains subject to and will not be significantly detrimental to the health, safety, or general welfare of the city. Planning Official shall review and either approve the request or determine if a new application must be submitted.

20.260.100 Term.

A. *General.* The initial term of a master plan approval shall be no longer than 10 years except for master plans approved prior to the adoption of this ordinance. Extensions may be granted in accordance with the criteria and procedures provided hereinafter.

B. *Extension.* If all phases of development approved in the initial approval have been not built out within the approved term, the applicant may request an extension using procedures contained in Section 20.210.050 VMC. Two one-year extension requests may be reviewed in accordance with the following criteria:

1. The applicant has pursued submitting the development applications and pursuing their approval in good faith; and
2. There have been no changes to the comprehensive plan, zoning ordinance, development standards or other applicable codes which are inconsistent with the approved master plan.
3. There are no other significant changed conditions which would render filing of the public facilities master plan contrary to the public health, safety or general welfare.
4. An extension request shall be filed in writing with the Planning Official at least 30 days prior to the expiration of the initial ten-year period or any subsequently approved extensions.
5. The Planning Official shall render a decision on the request pursuant to the Type I

C. For master plans 25 acres or greater, the term of validity of the master plan approval may be extended beyond 10 years, and the conditions under which future extensions may be approved, shall be established by a development agreement as provided for in VMC 20.250 and RCW 36.70b.170.

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CHAPTER 20.265
DESIGN REVIEW

Sections:

20.265.010 Purpose.

20.265.020 Applicability.

20.265.030 Procedure.

20.265.040 Review Criteria.

20.265.050 Limitations.

20.265.010 Purpose.

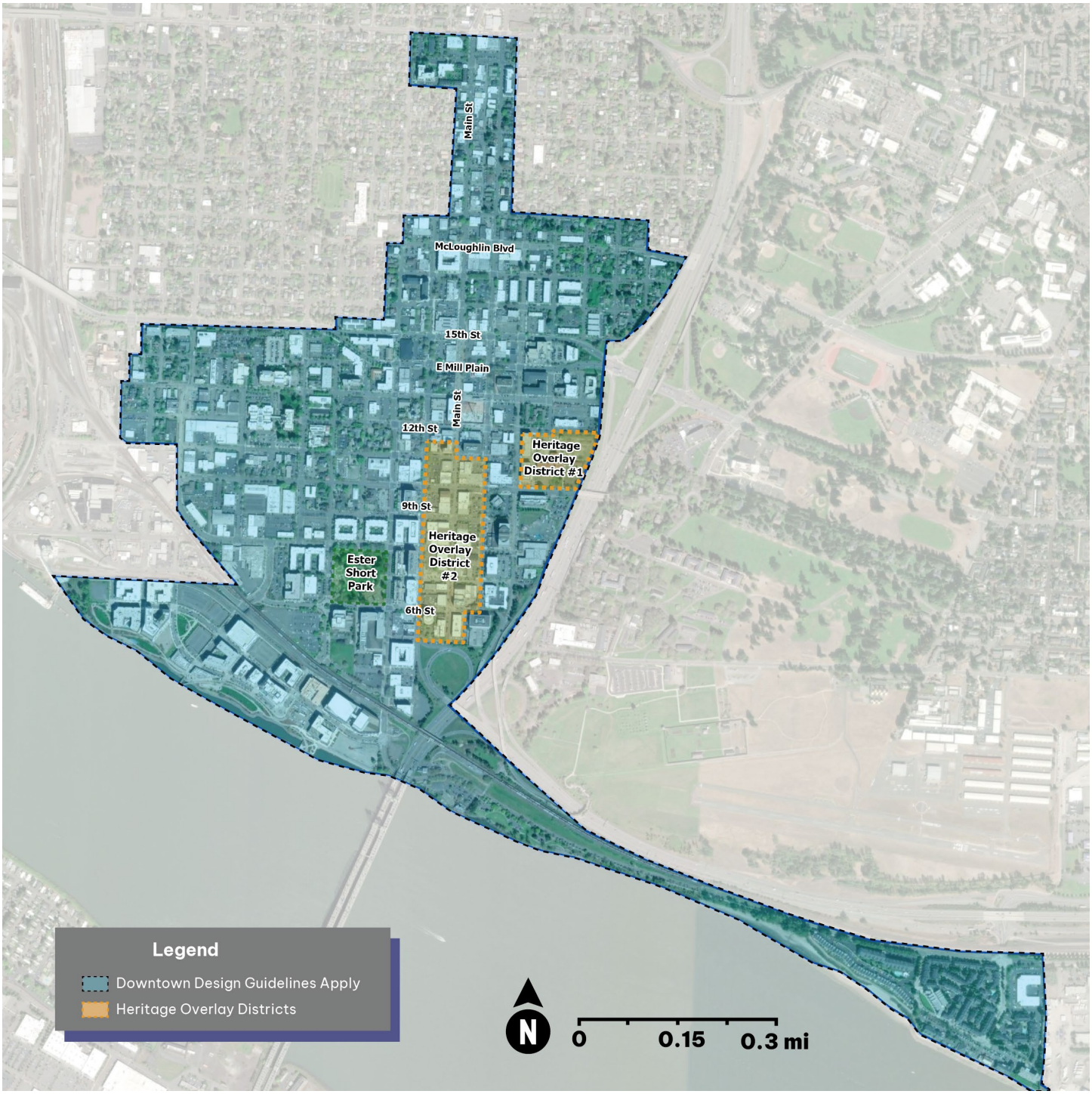
A. *Purpose.* The purpose of the design review process is to allow for architectural and design review of new construction and exterior improvements to buildings and developments in the downtown area prior to or in conjunction with a formal land use approval. Specifically, this chapter's purpose is to:

1. Preserve the character and quality of the City's cultural, historical and architectural heritage.
2. Protect certain public investments and ensure compatibility between public and private developments.
3. Encourage innovation and flexibility in design of new developments while maintaining standards necessary to protect the public interest.
4. Ensure design compatibility between existing and new development.
5. Promote qualities in the built environment that enhance the value of the area to the community.
6. Ensure development projects comply with adopted City design guidelines and plans.

20.265.020 Applicability.

A. *Location.* The provisions of this chapter shall apply to projects located in the downtown area and areas of the Columbia River waterfront, as illustrated in Figure 20.265-1.

FIGURE 20.265-1: DOWNTOWN DESIGN GUIDELINES PLAN AREA



B. *Exemptions.* The following activities shall be administratively exempt from design review:

1. Exterior work not visible from the public way;

2. Placement of permanent signs, unless: a) located within a heritage overlay district; b) are inconsistent with adopted design guidelines, such as pole signs; or c) potentially inconsistent with nearby uses;
3. Public art; and
4. Other minor construction such as replacement of doors, windows, awnings, etc., determined by the Planning Official to be exempt.

C. *Types of projects.* All projects that involve new construction, modification of the exterior of an existing building or parking lot located within the area defined in Subsection (A) shall be subject to approval by the Planning Official pursuant to this Chapter.

20.265.030 Procedure.

A. *Application requirements*. Any owner or representative intending to construct any new development or building, modify the exterior of any existing building, or make any improvements not exempt by 20.265.020(B) shall submit preliminary plans, sketches, elevations and concepts prior to, or submit final plans at the time of, application for a building permit or preliminary site plan review, as applicable. The Planning Official's decision regarding approval of the architectural design of the proposed construction shall be based on the requirements of this chapter. If the Planning Official identifies design-related issues or impacts resulting from a proposed project, the Planning Official shall inform the applicant in writing so that necessary corrections may be made prior to approval of the preliminary site plan review application, or building permit, if exempt from site plan review.

B. *Approval requirements.* Approval by Planning Official under Subsection (A) must precede the issuance of a development permit.

C. *Coordination with Historic Preservation Commission.* Properties that are on the local, state or national historic register may require review by the Historic Preservation Commission. The design review process for properties located on a historic register are contained in Section 20.550. 030 VMC.

D. *Appeals.* All final decisions of the Planning Official in regard to design review for projects not subject to a Type II site plan review process may be appealed to the City Council by the property owner or his agent only. Appeals of design-related decisions for projects that are subject to a Type II site plan review process shall be consolidated with an appeal of the site plan review decision pursuant to Section 20.210.130 VMC.

20.265.040 Review Criteria.

A. *Design review criteria.* The Planning Official, or the City Council if on appeal, shall base all reviews of the design of any proposed construction, remodeling or development according to the following criteria:

1. The requirements, guidelines, and applicable provisions of this Title that are applicable to the zoning district where the property is located and including all additional zoning regulations which may apply to the use or to its area by provision for overlay district, or made applicable by any conditional use or variance approval;
2. The Downtown Design Guidelines Manual kept on file and available for public inspection at the Community Development Department, as applicable;
3. The relationship found to exist between existing structures and open space, and between existing structures and other structures in the vicinity, and the expected effect of the proposed construction upon such relationships;
4. The impact of the proposed construction on adjacent uses, including impact of new or revised parking and pedestrian uses; and
5. The protection of neighboring uses from identifiable adverse effects of the design of the proposed construction.

20.265.050 Limitations.

A. *General*. In carrying out the authority and duties assigned by this chapter, the Planning Official shall observe the following limitations:

1. Review by the Planning Official shall be restricted to a prompt, reasonable and professional review of the proposal and plans, leaving full responsibility for design and development to the applicant. Required changes to plans must be made by the applicant, not by staff.
2. Individual initiative and innovation are to be encouraged.
3. Only the applicant's failure to comply with design review criteria described in Section 20.265.040 VMC shall justify disapproval of a proposal with regard to design matters.
4. Due account shall be taken of cost considerations, but these shall not be overriding.
5. The Planning Official shall take account of state and local legislation on shorelines and environmental protection; of access for persons with disabilities; and of all local regulations concerning construction, utilities, streets, and related matters.

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CHAPTER 20.270
PUBLIC FACILITIES MASTER PLANS

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20.270.010 Purpose.

A. *For public facilities.* Recognizes the valuable role played by public facilities in serving governmental, medical, educational, cultural and religious needs of the community by facilitating their siting and development over time. Master plan regulations provide the vehicle for large-scale, multi-phased public facilities by obtaining approval of several projects at one time and coordinating future provision of infrastructure capacity.

B. *For adjacent property owners and neighborhood associations*. Permits local property owners and neighborhood associations to evaluate the cumulative impacts associated with the full build-out of large-scale public facilities and to influence the design and development standards and conditions of operation necessary to minimize these impacts so as to protect the character of the surrounding areas.

C. *For the City.* Permits the city to ensure a full range of public facilities and services are available throughout the community to meet the governmental, medical, educational, cultural and religious needs of its citizens; to plan the extension of public infrastructure in a timely and efficient manner; and to ensure that the development of public facilities are compatible with community character and values.

20.270.020 Types of Master Plans.

A. *Detailed master plan.* A detailed master plan is one in which the initial and subsequent phases of development are described in substantial detail including the size, location and use of specific buildings; location of pedestrian/vehicular circulation; size and location of parking facilities; projection of existing and future infrastructure capacity and demand; and architectural and landscaping design standards and materials. If change to an approved project or phase is necessary, additional review is required, the extent of which is to be determined by the magnitude of the change. Therefore, the detailed master plan offers substantial certainty but less flexibility.

B. *Concept master plan.* A concept master plan is one in which the applicant gets initial approval of the concept of development by identifying a series of "building envelopes." Within each building envelope the range of primary and secondary uses; total gross area of development; total number of vehicular trips and parking space; infrastructure requirements; and other off-site impacts are estimated but without identifying the exact size, location and design of specific buildings. The concept plan also contains overall site design and development standards and architectural/landscaping principles and materials. At the time a specific building or phase is to be constructed, the applicant must request a land use review to provide the specific information not previously available and to ensure that the proposal is in keeping with the initially approved concept. A concept master plan offers substantial flexibility to alter specific buildings up until the time they are constructed while reducing the amount of information needed at the time since a substantial proportion of the development already has been approved. Thus, this option offers substantial flexibility but less certainty.

C. *Hybrid master plan.* In the hybrid master plan, the applicant provides a detailed master plan of the initial and one or more subsequent phases of development, so as to get approvals for several projects at once, but requests only conceptual approval for later phases, where there currently is inadequate information to project future applicant needs and mitigation measures. This option offers a balance of certainty and flexibility.

20.270.030 Applicability.

A. *Public facilities governed by these regulations*.

1. Governmental facilities such as civic centers; libraries; auditoriums; police, fire and other public safety facilities; and water, sewer and storm water treatment facilities.
2. Public transit facilities including train stations and transit centers.
3. Publicly- and privately-owned medical centers.
4. Public and private elementary, middle and high schools.
5. Public and private colleges and universities.

6. Religious institutions.

B. *When required.* The use of this chapter is voluntary. However, when this chapter is used all provisions of the chapter shall be applied.

C. *Type of master plan.* Public facilities that employ the provisions in this chapter, whether or not on a mandatory or voluntary basis, may select the type of master plan, as described in Section 20.70.020 VMC above, that best reflects its development needs.

20.270.040 Approval Process.

A. *Initial approval.* The initial approval of all public facilities master plans, regardless of type, shall be reviewed by means of a Type III procedure heard before the Hearings Examiner as contained in Section 20.210.060 VMC using the approval criteria contained in Section 20.270.050 VMC.

B. *Subsequent phases.* The type of development review required for subsequent phases of a master plan for which initial approval has been obtained depends on the type of master plan selected.

1. *Detailed master plan.* At the time of construction of a project or phase of development that was approved as part of the initial master plan, the applicant shall submit documentation demonstrating that the proposed project or phase is in substantial compliance with that contained in the original approval at the time the applicant submits the project for a building permit. An application submitted for a public facility master plan shall include the information listed below:

   a. Detailed site plan;

   b. Elevations of all buildings;

   c. Landscape plan;

   d. Erosion control plan;

   e. Stormwater management plan;

   f. *Narrative documenting the following.* Modification(s) to a project or phase of development shall require further review, dependent upon the extent of the modifications(s) as described in Subsection (C) below, subject to the approval criteria contained in Section 20.270.050 VMC:

      i. Compliance with all development and design standards in the base zone, or as modified in the initial master plan approval;

      ii. Compliance with all conditions of approval; and

      iii. Consistency with traffic, parking and infrastructure plans contained in the initial master plan approval.

2. *Concept master plan.* All subsequent projects or phases of development conceptually approved in the initial approval are subject to a Type II review, using the procedures contained in Section 20.210.050 VMC at the time of development. An application submitted for a public facility master plan shall include the information listed below:
    a. Detailed site plan;
    b. Elevations of all buildings;
    c. Landscape plan;
    d. Erosion control plan;
    e. Stormwater management plan; and
    f. Narrative documenting how the project or phase of development complies with the approved concept plan including:
        i. Proposed mix of uses; development cap for square footage, floor-to-area ratio (FAR) and lot coverage; design and development standards; and mitigation of off-site impacts;
        ii. All development and design standards in the base zone, as modified in the initial master approval;
        iii. All relevant conditions of approval;
        iv. Approved transportation, parking and infrastructure plans contained in the initial master plan approval.
    g. As part of the Type II application, the applicant may introduce any modifications necessary to a specific project or phase of development as specified in Subsections (C)(2) and (C)(3), subject to the approval criteria contained in Section 20.270.050 VMC. Modifications of the intensity contained in Subsection (C)(4) shall require a Type III application per 20.210.060 VMC, subject to the approval criteria contained in Section 20.270.050 VMC.
3. *Hybrid master plan.* For subsequent projects or phases of development for which detailed approval has been granted as part of the initial master plan approval, the applicant shall use the procedures described in Subsection (B)(1) above. For subsequent projects or phases of development for which conceptual approval has been granted as part of the initial master plan approval, the applicant shall use the procedures described in Subsection (B)(2) above.

C. *Modification of approved detailed or hybrid master plans.* The type of approval process required to address requested modifications of an approved detailed or detailed phases of a hybrid master plan depends upon the magnitude of the proposed change. Modifications include requests to add, remove or change any aspect of the approved master plan.

1. *Allowed without subsequent review.* The following do not require subsequent land use review and are allowed upon issuance of a building permit, if required:
    a. Interior improvements.
    b. Exterior improvements associated with existing buildings that do not involve an expansion of floor area, subject to all applicable base zone development and design standards, as modified in the initial plan approval, and relevant conditions of approval.
    c. Installation of new or modification of existing mechanical or electrical equipment, subject to all applicable base zone development and design standards, as modified in the initial master plan approval, and relevant conditions of approval.
    d. Maintenance of existing facilities, when a building permit is required.
2. *Type I procedure.* The following shall be reviewed by means of a Type I review, using procedures contained in Section 20.210.040 VMC:
    a. Modification of the location of an approved building or building addition, providing the modification complies with the applicable base zone development and design standards, as modified in the initial master plan approval, and all relevant conditions of approval.
    b. Modification of use or design and development standards including architecture, landscape architecture, pedestrian and bicycle facilities; signs and/or lighting elements approved in the initial plan.
    c. A new building of any size in any location that replaces a building approved but not constructed, providing there is: 1) no net increase in total building coverage, and 2) compliance with the applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval.
    d. New buildings or building additions up to 10,000 gsf not anticipated and, therefore, not contained in the initial master plan approval, except in locations within 100’ of the campus boundary abutting residentially-zoned property, in which case such new buildings or building additions shall not exceed 3,000 gsf, providing the modification complies with the applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval. Under this provision, new construction of such unanticipated buildings or building additions shall not exceed 10,000 gsf in any one year, and shall not exceed 30,000 gsf in any four years. As part of the Type I review, the applicant shall provide information on the amount of floor area built to date for the year in which the application is submitted, and the amount of floor area built within the four-year period preceding the request.

3. *Type II review.* The following shall be reviewed by means of a Type II review, using procedures contained in Section 20.210.050 VMC.
    a. A change in the approved campus boundary resulting in the exchange of properties where the total amount of land in the approved boundary remains the same or is decreased.
    b. New building or building addition exceeding 10,000 gsf but less than 50,000 gsf, not anticipated and, therefore, not contained in the initial master plan approval, located more than 100' from the campus boundary abutting residentially-zoned property. The request must comply with the applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval. For new buildings or building additions exceeding 25,000 gsf under this provision, the applicant shall provide traffic and parking analyses of the proposal as part of the Type II application.
    c. New building or building addition exceeding 3,000 gsf but less than 25,000 gsf, not anticipated and, therefore, not contained in the initial master plan approval, located within 100' of the campus boundary abutting residentially-zoned property. The request must comply with all applicable base zone design and development standards, as modified in the initial master plan approval, and all relevant conditions of approval.
    d. An increase or decrease of up to 10% in the total number of parking spaces approved in the initial master plan approval. The applicant shall provide a parking analysis related to the proposal as part of the Type II application.
4. *Type III review.* The following shall be reviewed by means of a Type III review, using procedures contained in Section 20.210.060 VMC.
    a. Expansion of the public facility's campus boundary beyond that contained in the initial master plan approval.
    b. New building or building additions of 50,000 gsf or more, not anticipated and, therefore, not contained in the initial master plan approval, except within 100' of the campus boundary abutting residentially-zoned property where this review shall be required for new buildings or building additions that exceed 25,000 gsf.
    c. Proposals that result in a cumulative increase of over 10% of total building floor area contained in the initial master plan approval.
    d. Proposals that result in an increase of 10% or more of site-generated vehicular trips.
    e. An increase or decrease greater than 10% in the total number of parking spaces contained in the initial master plan approval.

f. Existing utilization that summarizes the total number of employees and patrons, e.g., students, patients, citizens, routinely served on the site. This utilization can be expressed in terms that are appropriate to the use such as total full-time equivalent (FTE) students and total patient visits.

g. A proposed use or development that was denied in the initial master plan approval.

h. *Concurrent review.* An applicant may submit applications for initial review and one or more subsequent phases of development concurrently.

20.270.050 Approval Criteria.

A. *Approval criteria.* To receive approval for a public facility master plan, the applicant must demonstrate compliance to all of the following approval criteria:

1. *Content.* The master plan contains all of the components required in Section 20.270.070 VMC.

2. *Compliance with all applicable standards.* The proposed development and uses comply with all applicable standards of the title, except where variances are being approved as part of the master plan application.

3. *Transportation system capacity.* There is either sufficient capacity in the transportation system to support the development proposed in all future phases safely or there will be adequate capacity by the time each phase of development is completed.

4. *Availability of public services.* There is either sufficient capacity within public services such as water supply, police and fire services, and sanitary waste and storm water disposal, to support the development proposed in all future phases adequately, or there will be adequate capacity available by the time each phase of development is completed.

5. *Protection of designated resources.* City-designated resources such as historic landmarks, significant trees and sensitive natural resources (as identified on the city's inventories) are protected and enhanced in compliance with the regulations in this and other titles of the Municipal Code.

6. *Compatibility with adjacent uses.* The master plan contains design, landscaping, parking/traffic management and multi-modal transportation elements that limit conflicts between the public facility campus and adjacent uses.

7. *Mitigation of off-site impacts.* All potential off-site impacts including litter, noise, shading, glare and traffic, will be identified and mitigated to the extent practicable.

8. *Balance of benefits and impacts.* The public benefits of the proposed public facility outweigh any impacts that cannot be mitigated after considering the alternatives.

B. *Conditions of approval.* The review authority shall impose any conditions of approval necessary to mitigate potentially adverse impacts on surrounding properties to the greatest extent practicable.

20.270.060 Development Standards.

A. *Applicability.* The development standards in Subsection B below are established for public facilities located in residential zones.

B. *Development standards*.

1. For portions of an institutional campus abutting all residential zones and the CC and WX zones (not separated by a street):

   a. Minimum building setback: 35’;

   b. Maximum height: 35’ at the setback increasing 1’ for every one foot of additional setback for a maximum height of 90’; and

   c. Minimum landscaped buffering between use and adjacent residential or commercial development: 15’.

2. The development standards in Subsection (1) above do not apply to existing buildings.

3. All other development standards, including minimum and maximum setbacks, height, lot coverage, floor-to-area (FAR) ratio and minimum landscaping, will be developed as part of the master plan. Concurrent variances, as regulated by Chapter 20.290 VMC are not required.

20.270.070 Master Plan Components.

A. *Existing conditions.* An existing public facility that wishes to expand shall provide all of the following information regardless of the type of master plan format selected. A new public facility shall be provided the following information as appropriate:

1. Mission statement that identifies the purposes and scope of services provided by the public facility.

2. List of existing primary and accessory uses associated with the public facility.

3. Existing utilization that summarizes the total number of employees and patrons, e.g., students, patients, citizens, routinely served on the site. This utilization can be expressed in terms that are appropriate to the use such as total full-time equivalent (FTE) students and total patient visits.

4. *Establishment of the existing campus boundary.* The campus boundary may include properties not in the applicant's ownership with the understanding that these cannot be used for public facility uses until they come into the applicant' s ownership or control. Information shall include: 1) total acreage within the boundary; 2) list of all properties within the boundary by size, legal description and ownership, presented in both tabular and graphic formats; 3) calculation of the percentage by acreage of property within the campus boundary in the applicant's ownership or control; and 4) list of all properties by size and legal description within the applicant's ownership or control outside the campus boundary within 400', presented in both tabular and graphic formats.
5. Vicinity map that identifies surrounding uses within 400' of the campus boundary.
6. Zoning map that identifies base and overlay zoning designations for the campus and surrounding properties uses within 400'of the campus boundary.
7. Site description for all property in the applicant's ownership and control within the campus boundary including the following information provided in narrative, tabular and/or graphic formats:
    a. Topography and natural resources including 100-year flood plain; drainage patterns and courses; wetlands, rivers, springs and other water bodies; significant stands of trees and individual trees with a caliper greater than 6" as measured 4' above grade; significant fish and wildlife habitat, and natural hazards such as steep slopes greater than 15%, and unstable, impermeable or weak soils. Exhibit must include a site plan with no greater than 2' contours for slopes of 0 – 10% and no greater than for slopes greater than 10%.
    b. Open space inventory including all natural and landscaped areas.
    c. Inventory of cultural, historic and/or archeological resources on the site, if any.
    d. Existing building inventory including use, location, size and date of construction.
    e. Existing on-site pedestrian, bicycle and vehicular circulation system.
    f. Inventory of existing vehicular and bicycle parking spaces and location of surface and structured parking facilities.
    g. Location and size of all public and private utilities on the campus including water, sanitary sewer, storm water retention/treatment facilities, and electrical, telephone and data transmission lines.
    h. Location of all public and private easements.
8. Calculation of existing development intensity including average total site coverage (including building footprints, parking/roadways and sidewalks/pedestrian paths); total open space by acreage and percentage; and average floor-to-area (FAR) ratio.

9. Detailed description of the transportation system within and adjacent to the campus including:
    a. Street classification of all internal and adjacent streets.
    b. Transit service availability.
    c. Description of transportation demand management plan to reduce dependence on single-occupant vehicle (SOV) use, if any.
    d. Existing modal split data for employees and, if available, for patrons and visitors to the site.
    e. Baseline traffic impact study prepared by a licensed engineer to include information as required by the city's Traffic Engineer.
    f. Baseline parking demand study prepared by a licensed engineer to include information as required by the city's Traffic Engineer.
10. Analysis of existing infrastructure capacity on and in the vicinity of the campus.
11. Completed SEPA checklist on city-provided form with applicable fee.

B. *Planning history.* All existing and new public facilities, regardless of the type of master plan format selected, shall provide the following information:
    1. Summary that describes the public involvement/neighborhood planning process used by the applicant in the development of the master plan application including written agreements, meetings and other outreach efforts. The applicant shall have at least one meeting with the affected recognized neighborhood and business associations prior to the submission of the application with city staff in attendance. However, the applicant is encouraged to meet with affected property owners on a regular basis as the master plan is developed.
    2. Summary of all previous known land use cases affecting the applicant's property within the campus boundary and a list of all outstanding conditions of approval that either have not been addressed in the past and/or that remain in force at the time of the application.

C. Proposed development plan.
    1. *Detailed master plan.* The following information is required for a detailed master plan:
        a. *Description of anticipated growth during the master plan's term that justifies additional development.* This includes projections related to the increase in the number of employees, patrons and visitors to the site; increases in programming and events; and/or other indices of increased utilization.

b. *Description of the ultimate campus boundary.* If the applicant proposed to expand the boundary from its current configuration, information about the expansion area shall be provided including: 1) total additional acreage; 2) list of all properties within the expansion boundary by size, legal description and ownership, presented in both tabular and graphic formats; and 3) calculation of the percentage of acreage within the expansion area in the applicant's ownership or control. The expansion area may include properties not in the applicant's ownership with the understanding that these cannot be used for the public facility's use until they come into the applicant's ownership or control.

c. Description of all proposed development within the term of the master plan, presented in narrative, tabular and graphic formats:

   i. Description of expansions of existing buildings and new buildings anticipated during the term of the master plan, including size, location, approximate footprint and use.

   ii. All other site improvements including new or expanded surface and structured parking facilities; bicycle parking facilities; on-site pedestrian, bicycle and vehicular circulation; transit stops and pedestrian/transit amenities; and open space and landscaped areas.

   iii. The location of new and/or expanded existing public and private infrastructure including water, sanitary sewer, storm water retention/treatment facilities, and electrical, telephone and data transmission lines.

d. Phasing plan for implementation of proposed development.

e. Summary of development intensity at full build-out of the master plan including average FAR and lot coverage.

f. Summary of transportation facilities, including:

   i. Traffic impact study prepared by a licensed engineer that describes traffic impacts associated with each phase of development and at full build-out under the master plan, and mitigation plan for accommodating this traffic in compliance with regulations for transportation concurrency contained in Title 11.95 VMC. The specific content of the traffic impact study shall be determined by the city's Traffic Engineer.

   ii. Parking impact study describing the parking demand associated with each phase of the development and at full build-out under the master plan, and a mitigation plan for accommodating this parking demand within the site.

   iii. Transportation demand management plan to encourage employees and patrons to use active modes of transportation including carpooling/vanpooling, walking, biking, transit and telecommuting. The plan shall comply with the requirements of the Washington Commuter Trip Reduction Rule, if applicable.

iv. Concurrent or proposed street vacations, with a description of potential parking and traffic/pedestrian circulation impacts, if any, and appropriate measures to mitigate these impacts.

g. Plan for protecting city-designated environmental, historic/cultural and open space resources, if any.

h. Design standards that will govern the orientation and design of buildings and other improvements including but not limited to the following. Public facilities shall be encouraged to use building techniques and materials that result in projects that are architecturally sound, durable and energy-efficient.

i. Architecture, including design standards and building materials board.

ii. *Landscaping, including design standards and standard plant list*. Native plant materials are preferred.

iii. Pedestrian circulation, including development standards and materials.

iv. Bicycle parking facilities, including specifications.

v. Signs.

vi. Lighting.

i. Neighborhood communication and coordination plan to ensure that the public facility institutionalizes an on-going process for communicating and problem-resolution with neighbors. This includes the following:

i. An annual meeting hosted by the public facility with representatives from the recognized neighborhood and business associations and other interested parties within whose boundaries the public facility is located. The purpose of the meeting is to discuss short- and long-term plans for campus development. The public facility must extend the invitation, and have documentation therein, even if the affected associations choose not to meet with the public facility representatives. This information shall be provided to the city.

ii. A process for meeting with neighborhood and business associations to provide the opportunity to review and comment in a timely fashion prior to construction of specific buildings or other development, to be coordinated with the appropriate land use review as described in Section 20.270.040(B) VMC.

2. *Concept master plan.* The following information is required for a concept master plan:

a. All of the same information as required for a detailed master plan described in Subsection 1 above except (1)(c) that shall be replaced with the information contained in Subsection (b)-(e) below.

b. Creation of a pedestrian, bicycle and vehicular circulation framework for the entire site at full build-out of the master plan.

c. Creation of an open space framework for the entire site at full build-out of the master plan.

d. Using the circulation and open space as a framework, division of the proposed development area into a series of phases. For each phase, provide the following information:

i. The approximate mix of uses by percentage;

ii. The total gross square footage of development, FAR and lot coverage anticipated without detailing the specific location, size and footprint of specific buildings or surface/structured parking facilities;

iii. The proportion of the phase to be devoted to circulation and open space.

3. *Hybrid master plan.* All of the same information as required for a detailed master plan described in Subsection (1) above will be required in the hybrid master plan for phases where detailed design/development approval is sought. For phases where only concept design/development approval is sought, the requirements of Subsection (2) above shall apply.

20.270.080 Vesting.

A. *Applicability.* A detailed, concept or hybrid master plan shall be reviewed under this chapter and the zoning, development and other land use control ordinances contained in the Vancouver Municipal Code and any uncodified ordinances modifying the same, in effect on the date a master plan application has been deemed fully complete by the city. For the purposes of this section, a vested master plan application shall mean that the applicant is entitled to implement the master plan, or any portion of it, described in the application, under the zoning, development and land use ordinances applied by the city in its review of the master plan application. An application shall be vested for the term of the master plan as governed by 20.270.100 VMC.

B. *Subsequent Regulations.* An applicant may have the option of subjecting its development to any subsequently enacted land use ordinances. However, should an applicant choose to subject its development to a subsequently enacted land use ordinance, this shall have the effect of subjecting the development to all land use ordinances enacted after the application is vested, unless the city and applicant agree otherwise. In order for the Planning Official to grant such a request, the applicant must demonstrate how later enacted ordinance(s) will benefit both the project and the city while maintaining consistency with the comprehensive plan. Applicant must also demonstrate that use of later enacted ordinances will not conflict with other ordinances the development remains subject to and will not be significantly detrimental to the health, safety, or general welfare of the city. Planning Official shall review and either approve the request or determine if a new application must be submitted.

20.270.090 Concurrency.

A. *Applicability.* An applicant for a detailed, concept or hybrid plan shall be entitled to reserve capacity in the transportation system for the proposed development's trip generation and shall be deemed to have achieved transportation concurrency, under the concurrency rules and regulations in effect at the time that the master plan application is vested under Section 20.270.070 VMC above, if 1) the applicant obtains a certificate of concurrency for all or any portion of its proposed development under Title 11.95 VMC, Transportation Concurrency; or 2) the applicant and the city enter into a development agreement as regulated by Chapter 20.250 VMC, Development Agreements, which by its terms reserves capacity in the transportation system and includes a finding of transportation concurrency. The term for the concurrency determination shall be set as the term in the certificate of concurrency or the development agreement, as the case may be.

20.270.100 Term.

A. *General.* The term of a public facilities master plan shall be no longer than 10 years. Extensions may be granted in accordance with the criteria and procedures provided hereinafter.

B. *Extension.* If not all phases of development approved in the initial approval have been built out within the approved term, the applicant may request an extension using procedures contained in Section 20.210.050 VMC. Two one-year extension requests may be reviewed in accordance with the following criteria:

1. The applicant has pursued submitting the master plan in good faith; and
2. There have been no changes to the comprehensive plan, zoning ordinance, development standards or other applicable codes which are inconsistent with the approved master plan.
3. There are no other significant changed conditions which would render filing of the public facilities master plan contrary to the public health, safety or general welfare.
4. An extension request shall be filed in writing with the Planning Official at least 30 days prior to the expiration of the initial ten-year period or any subsequently approved extensions.
5. The Planning Official shall render a decision on the request pursuant to the Type I procedures.

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CHAPTER 20.280
SITE PLAN REVIEW

Sections:

20.280.010 Purpose.

20.280.020 Applicability.

20.280.030 Approval Process.

20.280.040 Submission Requirements.

20.280.050 Approval Criteria.

20.280.060 Escrow and Assurances.

20.280.010 Purpose.

Purpose. The purpose of this Chapter is to establish procedures, criteria and timelines for reviewing certain development applications within the City of Vancouver. More specifically, this chapter is intended to achieve the following:

A. *Compliance with applicable standards.* Establish procedures to ensure that the design of site improvements and building improvements are consistent with applicable standards, minimize adverse impacts on surrounding land uses, and allow for and encourage flexibility in the design and layout of site improvements and buildings, and innovation in design and construction.

B. *Public review.* Provide opportunity for public review and comment on development proposals.

20.280.020 Applicability.

A. *General.* All new developments and modifications to existing developments shall require site plan review and approval prior to the issuance of any building permits, establishment of any new uses, or commencement of any site work unless otherwise exempted in this title. Developments subject to site plan review shall comply with the Vancouver Municipal Code and all other State statutes and applicable laws and regulations.

B. *Exemptions.* The following developments and land use categories shall be exempt from Site Plan Review:

1. Land divisions and boundary line adjustments pursuant to Chapter 20.320 VMC.

2. All new developments and buildings that are engaged in agriculture/horticulture as defined in Chapter 20.160 VMC Use Classifications.
3. Other activities including:
    a. Landscaping or landscape alterations, unless such landscaping or alterations would modify or violate a condition of approval. In such instance, the activity shall be processed as a modification of the existing land use approval pursuant to Section 20.210.140 VMC, Post Decision Review.
    b. Normal or emergency repair or maintenance of public or private buildings, structures, landscaping or utilities.
    c. New parking lots having 10 or fewer parking spaces.
    d. Any change in commercial or industrial land use to another commercial or industrial land use permitted in the applicable zoning district, provided any site alteration is below the thresholds in subsection D below.
    e. Building permits required pursuant to the City's adopted building code not requiring a development land use permit pursuant to this title, including interior remodeling and tenant improvements.
    f. On-site utility permits, e.g., sewer hook-ups, water hook-ups, Fire Department permits.
    g. Comprehensive Plan map and text amendments and associated zone changes pursuant to 36.70A.130 RCW or Section 20.210 VMC.
    h. New construction of or modification to existing single-family and middle housing (six units or less on a parent parcel) not requiring an environmental review. Middle housing shall be limited to three (3) or less floors above grade.
    i. Site-specific rezoning requests not associated with any other land use permit.
    j. Projects processed under an approved, detailed Public Facilities Master Plan.
    k. Six units or less on a parent parcel.
    l. Notwithstanding the provisions of 20.280.020 (A), (C) and (D), any development that the Planning Official finds should be exempt because it does not result in an substantive increase in land use activity or intensity or in any adverse off-site impact perceptible to a person of average sensibilities, and because the City can assure the development complies with applicable standards without site plan review.

C. *Development subject to Type I Site Plan Review.* New development or modifications to an existing permitted development or existing legal nonconforming use shall require a Type I review if the proposal would result in any of the following:

1. New residential developments of between seven and 200 dwelling units, including additions of at least seven units, provided the cumulative total does not exceed 200 dwelling units;
2. Nonresidential development of less than 30,000 square feet or, if existing, an increase in the floor area of a nonresidential structure or use by up to 6,000 square feet;
3. For existing developments a reduction in the area reserved for open space, recreational facilities and/or landscaped areas by up to 20 percent;
4. New parking lots of 11 to 89 parking spaces or, if existing, an increase in the number of existing parking spaces by up to 20 percent;
5. Modular school classrooms on an established public or private school site shall be reviewed under a Type I site plan process.
6. A change in the location of access ways to frontage roads where off-site traffic would be affected.
7. Projects which qualify as a planned action shall be processed under a Type I process, subject to any additional requirements, as applicable, of Chapter 20.790 VMC, Planned Action Review.

D. *Development subject to Type II Site Plan Review.* New development or modifications to an existing permitted development or existing legal nonconforming use shall require a Type II review if the proposal would result in any of the following:

1. New residential development of 201 units or more;
2. New nonresidential developments of 30,001 square feet or more of, if existing, an increase in the floor area of a nonresidential structure or use by more than 6,000 square feet;
3. For existing developments, a reduction in the area reserved for open space, recreational facilities and/or landscaped areas by more than 20 percent; or
4. New parking lots of 90 or more spaces or, if existing, an increase in the number of existing parking spaces by more than 20 percent or an increase of more than 40 parking spaces, whichever is greater.

20.280.030 Approval Process.

A. *New development or redevelopment.* Site plan development review for a new development or redevelopment shall be processed by means of a Type I or Type II procedure, as governed by Section 20.210.040 or .050 VMC, using approval criteria contained in Section 20.270.040 VMC.

B. *Modifications.* Modifications of an approved site plan shall be processed pursuant to Section 20.210.140 VMC, Post-Decision Review.

C. *Approval period.* Site plan review approval shall be effective for a period of 5 years from the date of approval. The site plan review approval shall expire if:

1. Substantial construction of the approved plan has not begun within a five-year period; or
2. Construction on the site is a departure from the approved plan.

D. *Extension.* The Planning Official may grant an extension of the approval period by means of a Type I procedure, pursuant to Section 20.210.040 VMC, provided that:

1. A three-year extension may be granted for projects which received preliminary land use approval on or before June 30, 2026; any project approved after such date shall be eligible for a one-year extension; and
2. There have been no changes to the original site plan as approved by the Planning Official;
3. There have been no changes to the applicable Comprehensive Plan policies and ordinance provisions on which the approval was based; and
4. The applicant has demonstrated a good faith effort to proceed with the activity.

E. Phased development.

1. Upon request The Planning Official may approve a time schedule for developing a site in phases, but in no case shall the total time period for all phases be greater than 6 years without reapplying for site plan review. Phasing plans shall be reviewed by means of a Type I procedure, using the approval criteria contained in Subsection (2) below.
2. The criteria for approving a phased site plan review application shall be as follows:
   a. The public facilities are necessary to serve the phase constructed in conjunction with or prior to each phase;
   b. The development and occupancy of any phase is not dependent on the use of temporary public facilities. A temporary public facility is any facility not constructed to the applicable City or District standard; and
   c. The phased development shall not result in requiring the City, other property owners, or latecomers, to construct public facilities that were required as part of the approved development proposal.

20.280.040 Submission Requirements.

Unless waived in writing and in advance by the Planning Official, an applicant shall submit all of the following items with an application for a Type I or Type II site plan review:

A. General.

1. A completed application form provided by the Planning Official.
   a. An existing conditions plan described in subsection B of this section.

b. A site plan described in subsection C of this section.

c. A preliminary stormwater and erosion control plan or plans described in subsection D of this section.

d. Architectural plans and elevations described in subsection E of this section.

e. e. A landscape and tree plan described in subsection F of this section.

2. A narrative describing the development including uses proposed for the site, hours of operation, hours and frequency of deliveries, and construction schedule.

3. Payment of all applicable review fees.

4. Certified mailing list (not applicable for Type I applications). Current Clark County assessor map(s) showing the property(ies) within a 300-foot radius of the site, per the requirements in VMC 20.210.050 and 20.210.060, decision-making procedures, and one set of stamped and addressed envelopes and one set of mailing labels with the names and addresses of owners of all properties within the 300-foot radius. Such list shall be certified as accurate and complete by the Clark County assessor or a title company. For non-owner-occupied properties, provide one set of stamped and addressed envelopes and one set of mailing labels addressed to "occupant" as can be determined from available county assessor records .

5. The location of natural conditions, such as:

a. Waterbodies, the 100-year floodplain, aquatic habitats, natural drainage courses, wetlands, spring seeps, closed depression areas, groundwater elevations, aquifers, and wellhead protection areas.

b. Geological hazard areas such as slopes in excess of 15 percent unstable or weak soils, soils with high erosion potential, rock outcroppings, and areas of healthy native soils and hydraulic conductivity.

c. Existing vegetation including stands of trees and individual trees with a caliper greater than six inches, additional information necessary to comply with Chapter 20.450.035 VMC, Landscaping and Tree Conservation, and areas of wildlife habitat.

B. *Existing conditions plan.* An existing conditions plan shall include the following information:

1. A vicinity map showing streets and access points, pedestrian and bicycle pathways, transit stops and utility locations within a given radius of the site.

2. The site size, dimensions and orientation relative to north.

3. The location, name and dimensions of all streets adjoining the site indicating whether privately or publicly owned.

4. The location of existing structures and other improvements on the site, including structures, driveways, parking, loading, pedestrian and bicycle paths, passive or active recreational facilities or open space, and utilities.
5. Elevation of the site at two-foot contour intervals for grades zero percent to 10 percent and at five-foot contour intervals for grades more than 10 percent.
6. The approximate location of significant natural conditions, such as:
    a. The 100-year floodplain.
    b. The location of drainage patterns and drainage courses.
    c. Slopes in excess of 15 percent.
    d. Unstable ground, e.g., land subject to slumping, slides or movement.
    e. High seasonal water table or impermeable soils.
    f. Areas having severe soil erosion potential.
    g. Areas having severe weak foundation soils.
    h. Significant wildlife habitat or vegetation.
    i. Rock outcroppings.
    j. Information necessary to comply with Chapter 20.450.035 VMC, Landscaping and Tree Conservation, where applicable.

C. *Proposed site development plan.* The proposed site plan shall be drawn at the same scale as the existing conditions plan and shall include the following information:

1. The proposed site and its dimensions and area, orientation relative to north.
2. Abutting properties or, if abutting properties extend more than 100 feet from the site, the portion of abutting properties within 100 feet of the site, and the approximate location of structures and uses on abutting property or portion of the abutting property.
3. The location and dimensions of proposed development, including the following:
    a. Streets and other rights-of-way and public or private access easements on and adjoining the site;
    b. Vehicle, pedestrian and bicycle parking and circulation areas, including bicycle racks/lockers and accessible parking stalls and disembarking areas, accessible route of travel, proposed ramp and signage as required by Chapter 51-40 WAC;
    c. Loading and service areas;
    d. Active or passive recreational or open space features;

e. Above-ground utilities;

f. Existing structures to be retained on the site and their distance from property lines;

g. Proposed structures on the site, including signs, fences, etc., and their distance from property lines;

h. The location and type of proposed outdoor lighting and existing lighting to be retained; and

i. The size and location of storage areas for solid waste, including recyclable materials and organics.

j. The location of all Building Types indicating their relation to primary streets and side streets, lot lines, and all other requirements for each Building Type per Chapter 20.420 VMC.

4. Summary table which includes parcel zone, total site area, gross floor area by use, (i.e., manufacturing, office, retail, storage), itemized number of full size, compact and accessible parking stalls and the collective total number, total lot coverage proposed, including residential density calculations.

5. Location, dimensions, and purpose of existing easements.

D. Grading, Erosion Prevention, and Stormwater Plans.

1. Grading Plan indicating areas of soil protection and compaction prevention;

2. Erosion Prevention measures as required in Chapter 14.24 VMC; and

3. Stormwater Site Plan as required in Chapter 14.25 VMC, including identification of areas and types of vegetation preserved as part of low impact development plan.

E. *Architectural plans and elevations.* The following architectural plans and elevations shall be provided:

1. Floor plans showing at least the gross square footage of each structure and outdoor activity area proposed on the site, including existing structures and outdoor activity areas to be retained.

2. A description of the proposed and potential uses of each structure or portions of a structure and each outdoor activity area.

3. Typical elevation drawing of each structure.

4. Identify locations of walls, exits and openings.

F. *Landscape plan.* The landscape plan shall be drawn at the same scale as the existing conditions plan, or a larger scale if necessary. A landscape plan shall show the following:

1. The location, species and size, i.e., diameter and/or height, of existing landscape material, identifying the material to be removed and to be retained;

2. The location, species, size at planting and spacing of proposed plant materials;

3. The proposed landscape area of the site (i.e., in terms of square feet and a percentage of the net site area);
4. The location, height and material of fences, buffers, berms, walls and other proposed screening;
5. The location and dimensions or area of terraces, decks, shelters, play areas and open spaces; and
6. Surface water management features that are integrated with landscape, recreation or open space areas including stormwater facility planting plans and areas of vegetation preserved as part of a low impact development plan.

G. *Tree, Vegetation, and Soil Plan.* As required by Chapter 20.450.035 VMC, Landscape and Tree Conservation. Tree plan may be combined with the landscape plan.

H. *Other.* Other information shall be provided as needed to show the development complies with other applicable standards and with conditions of approval of related SEPA determinations and land use actions and permits.

I. *Fees payable.* Applicable fees as specified in Table 20.180.060, Planning Fees, shall be paid at the time of application for Site Plan Review.

20.280.050 Approval Criteria.

A. *Compliance with applicable standards.* The proposed development shall comply with all applicable design and development standards contained in this Title and other applicable regulations.

B. *Adequacy of public facilities.* The applicant shall demonstrate availability of adequate public services, e.g., roads, sanitary and storm sewer and water, available to serve the site at the time development is to occur, unless otherwise provided for by the applicable regulations.

20.280.060 Escrow and Assurances.

Requirements. The Planning Official may require the use of escrow or other assurances to ensure that the completed project will be in compliance with the approved plan.

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CHAPTER 20.285
TEXT AND MAP AMENDMENTS

Sections:

20.285.010 Purpose.

20.285.020 Applicability.

20.285.030 Initiation.

20.285.040 Review Process.

20.285.050 Approval Criteria – Comprehensive Plan and Concurrent Zoning Map Amendments.

20.285.060 Approval Criteria – Standalone Zoning Map Amendments.

20.285.070 Approval Criteria – Comprehensive Plan or Zoning Code Text Amendments.

20.285.080 Notice Provisions.

20.285.090 Appeals of Final Decisions.

20.285.100 Amendments within the Unincorporated Vancouver Urban Growth Area.

20.285.110 Record of Amendments.

20.285.010 Purpose.

This chapter provides standards and processes to review amendments to maps or text of the Comprehensive Plan and Title 20 zoning code. Such amendments may be periodically necessary to reflect changing conditions and needs or to address legal considerations.

20.285.020 Applicability.

A. *Types of proposals.* The following types of proposals are reviewed under this chapter:

1. Map amendments to the Comprehensive Plan or to VMC Title 20 zoning designations applying to one or more properties.
2. Development agreements components pertaining to policy and regulations that are included with property specific Comprehensive Plan or zoning map changes being reviewed under this chapter.
3. Text changes to the Comprehensive Plan or to this title, except fees under Chapter 20.190 VMC.

4. Other development proposals which the city manager or designee determines warrant consideration under this chapter by virtue of their size, complexity, or impact on area wide planning policies.

20.285.030 Initiation.

A. Proposals reviewed under this chapter may be initiated by property owners or their representatives, the City of Vancouver, or private citizens or groups as follows:

1. *Map Changes.* Property owners or any party may initiate Comprehensive Plan and associated zoning map designation changes applying to one or more properties, through submittal of an Annual Review application and associated fees specified in Chapter 20.190 VMC. Standalone zoning changes not requiring a Comprehensive Plan change shall be subject to zone change application and associated fees per Chapter 20.190 VMC.

2. *Text Changes.* Any party may initiate comprehensive plan or zoning code text changes through submittal of a text change application and associated fees per Chapter 20.190 VMC.

3. *City Initiated Map or Text Changes.* The City of Vancouver, on its own behalf or on behalf of any party, may initiate Comprehensive Plan or zoning map and/or text changes. City initiation of outside requests for amendments shall be at City discretion, and generally limited to proposals that are limited in scope and/or clearly warranted in terms of policy implications, and subject to the following:

   a. Private parties shall submit a written summary of the amendment proposed to community development department, an indication of why it is needed, and the potential land use impacts if approved. No application fees shall be assessed.

   b. City staff shall maintain a docket listing of private party requests, and shall provide the listing not less than once per year to the Planning Commission, which shall determine which items shall be scheduled for public hearing review, deferred to future work programs, or discontinued. Requesting parties of discontinued proposals shall have the option of submitting formal applications under this chapter.

20.285.040 Review Process.

A. *Overall Timing.* Except as noted herein, All Comprehensive Plan map or Comprehensive Plan text amendments will be reviewed concurrently and not more than once per calendar year, except as noted herein. Site specific zoning map amendments applying to properties proposed for Comprehensive Plan map changes shall also be submitted at that time. All other zoning map or zoning text amendments may be reviewed independently and more frequently than once per year.

B. *Pre-Application.* Comprehensive Plan or zoning map amendments proposed by private parties shall require a pre-application conference. The conference shall be scheduled upon receipt of a complete Map Amendment Pre-application Form. Based on the information provided, the pre-application conference is intended to provide for a discussion of major issues and concerns and possible staff recommendation, and identify materials needed to be submitted with the full application. Staff will provide a written summary within 14 days following the conference. Pre-application conferences are nonbinding, and do not vest the development rights of the proposals involved. Pre-application conferences shall not be required for City initiated map amendments, or text amendments initiated by any party.

C. *Review Body.*

1. All proposed Comprehensive Plan or zoning map or text changes shall be initially reviewed by the Planning Commission unless noted herein.
2. Standalone zoning map changes that propose to shift from one residential zoning designation to the next most or least intensive designation, and are accompanied by a proposed subdivision, shall be reviewed by the Hearing Examiner.
3. Development agreements accompanying a proposed zoning map change shall be reviewed by the body reviewing the map change.

D. *Hearings Process.* The Planning Commission at a duly advertised public hearing shall develop and forward a recommendation for approval, approval subject to modifications or conditions, or denial to the Vancouver City Council. The Vancouver City Council shall hold a duly advertised, open record public hearing to make final decisions on the Planning Commission recommendation.

E. *Timing Exceptions.* The following Comprehensive Plan changes may be reviewed more frequently than once per year.

1. The initial adoption of a subarea plan.
2. The adoption or amendment of a shoreline master program pursuant to Chapter 90.58 RCW.
3. The adoption or amendment of the capital facilities or transportation element of the Comprehensive Plan is undertaken concurrently with a related budget action.
4. The adoption of Comprehensive Plan amendments necessary to enact a Planned Action under RCW 43.21C.031(2).
5. Comprehensive Plan amendments concurrent and related to an annexation.

6. Corrections of scrivener or mapping errors. Scrivener or mapping errors are defined as minor map or text errors in the comprehensive plan or development regulations which were clearly unintended and inconsistent with the record of their original adoption, as determined by the city. Correction of such errors shall be submitted by the city only, at no charge to parties demonstrating the error.
7. Emergency Comprehensive Plan amendments, defined as a change of community wide significance, and including but not limited to the following:
    a. Action necessary to address threats to public health or safety.
    b. Action necessary to ensure that the goals and policies of the Comprehensive Plan are not substantially obstructed.
    c. Action necessary to respond to an order from the Growth Management Hearings Board or competent court of law.

F. *Periodic Comprehensive Plan updates.* At least once every ten years or as otherwise provided by state law the City shall initiate a periodic review of the overall Comprehensive Plan and land use regulations. Within the calendar year of such review the city may alter the procedural requirements herein, although other approval criteria of this chapter shall still apply.

20.285.050 Approval Criteria – Comprehensive Plan and Concurrent Zoning Map Amendments.

A. Overall proposed map amendments reviewed under this chapter shall be approved only if demonstrated by the proponent to be in the public interest, as based on a review of how the proposal is more consistent than the existing designation with applicable policies of the Vancouver Strategic Plan and Comprehensive Plan.
    1. *Scope of review.* Review and evaluation of proposed Comprehensive Plan or zoning map changes shall consider both the likely and possible future use of the site and associated impacts.
    2. *Cumulative Impacts.* The review of individual comprehensive plan map or policy amendments, other than exceptions noted in VMC 20.285.040, shall also consider the cumulative transportation, land supply, and environmental impacts of other plan amendments proposed within the same annual cycle.

20.285.060 Approval Criteria – Standalone Zoning Map Amendments.

A. Zoning map amendments not involving associated Comprehensive Plan map amendments shall demonstrate the following:
    1. How the proposal is more consistent with applicable policies of the Vancouver Strategic Plan and Comprehensive Plan than the existing designation; and

2. That a change in circumstances has occurred since the existing designation was established.

20.285.070 Approval Criteria – Comprehensive Plan or Zoning Code Text Amendments.

A. Text amendments to the Comprehensive Plan or VMC Title 20 zoning standards shall demonstrate the following:

1. The proposal is consistent with applicable policies of the Vancouver Strategic Plan and Comprehensive Plan; and

2. The proposal is necessary to further the public interest based on present needs and conditions.

20.285.080 Notice Provisions.

A. Notice indicating the time and place of public hearings for review of proposed amendments pursuant to this chapter shall be provided as follows:

1. For all amendments subject to this chapter, published notice within a newspaper of record at least 10 calendar days prior to the hearing.

2. For site specific map amendments, the following additional notice shall be provided:

a. Written notice mailed at least 10 calendar days prior to the public hearing to property owners and residents located within 300 feet of subject properties, as determined by records of the County Assessor.

b. If located within or adjacent to an officially recognized neighborhood, notice shall also be sent to the neighborhood association president or chair.

c. A large format sign or signs consistent with City standards on or adjacent to the proposal site shall be posted at the site at least 10 calendar days prior to the hearing.

d. Written or posted notice may be foregone at the Planning Official's discretion for map amendments which are limited to minimal adjustment of comprehensive plan or zoning designation borders within a property, or other corrections which do not increase the potential of additional land use development impacting the surrounding area.

3. For text amendments, written notice mailed at least 10 calendar days to individuals, groups, or agencies which are deemed necessary and appropriate by the City or which have requested notice of the particular action.

4. With the exception of newspaper publication, failure to provide notice to any person or group subject to this chapter shall not automatically invalidate the proceedings associated with the proposed action.

20.285.090 Appeals of Final Decisions.

Final decisions of the City Council may be appealed to the Washington Growth Management Hearings Board or superior court, where appropriate, in accordance with provisions and timelines set forth by state statute and regulations. Where state statute or regulations do not provide timelines, an appeal must be submitted within 30 calendar days of the final council decision. Aggrieved parties shall exhaust local administrative remedies prior to state or federal administrative or judicial review of the city council decision.

20.285.100 Amendments within the Unincorporated Vancouver Urban Growth Area.

A. Comprehensive Plan and regulation map or text amendments within the Vancouver Urban Growth Area outside of city limits are the jurisdictional responsibility of Clark County. The City shall review notice provided from Clark County on such amendments, and shall reciprocally provide notice to Clark County of proposed amendments within city limits.

B. The City shall not support amendments which raise inconsistencies with this chapter, capital facilities plans or adopted population projections.

20.285.110 Record of Amendments.

The Planning Official shall maintain a record of amendments to the text and map of this title in a format convenient for the use of the public.

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CHAPTER 20.290
VARIANCES

Sections:

20.290.010 Purpose.

20.290.020 Approval Process.

20.290.030 Submission Requirements.

20.290.040 Approval Criteria.

20.290.050 Time Limit of Approval.

20.290.010 Purpose.

General. A variance to any development standard contained in this Title other than density and lot area may be granted when practical difficulties, unnecessary hardship or results inconsistent with the general purposes of Title 20 VMC would result from the literal enforcement of its requirements. The sole purpose of any variance shall be to prevent such difficulties, hardship or results, and no variance shall be granted which would have the effect of granting a special privilege not shared by other property in the same vicinity and zone except when necessary to avoid such difficulties, hardship or results.

20.290.020 Approval Process.

A. *Type I Variance.* A Type I Variance is one that results in the modification of up to 20% of a numerical development standard that shall be subject to a Type I procedure, pursuant to 20.210.040 VMC, subject to the approval criteria contained in Section 20.290.040(A) VMC.

B. *Type II Variance.* A Type II Variance is one that results in the modification of a numerical development standard by more than 20% that shall be subject to a Type II procedure, pursuant to 20.210.050 VMC, subject to the approval criteria contained in Section 20.290.040(B) VMC.

Concurrent review. The applicant may submit requests for more than one variance for concurrent review.

20.290.030 Submission Requirements.

A. *Application – Fees.* The applicant must submit a completed application form as prescribed by the Planning Official

B. *Required information.*

1. Narrative statement describing the requested variance(s) and demonstration of compliance to the appropriate approval criteria contained in VMC 20.290.040.
2. A legible site plan drawn to scale showing the arrangement of the proposed development, and accurate representation of the size and shape of the parcel(s) including easements of any kind, all dimensions and parcel orientation. Include appropriate scale and north arrow.
3. Locations, dimensions and height of all existing and proposed buildings and structures, including garages, carports, fences, decks, patio covers and other accessory structures. Include dimensions from each other and from all property lines. Show dimension of eaves projecting beyond a wall or supporting post. Indicate usage of all structures.
4. Elevation of site at two-foot contour intervals for grades zero to 10 percent and at five-foot contour intervals for grades greater than 10 percent.
5. Existing and proposed curbs, sidewalks and curb-cuts. Indicate center line of street(s).
6. Location and detailed layout of off-street parking and loading areas.
7. Location of unstable ground, including high seasonal water table, impermeable soils, areas having a severe soil erosion potential, areas having severely weak foundation soils, significant historical, cultural or archaeological resources, significant wildlife habitat, and rock outcroppings. Note if none of these apply.
8. Archaeological pre-determination report, if necessary.
9. The approximate location and type of vegetation, including individual trees that have a diameter of six inches or more measured four feet above grade. The plan may show clusters of such trees rather than individual trees when individual trees are near one another. Provide proposed plan for compliance with Section 20.450.035 VMC, Landscaping and Tree Conservation, if necessary.
10. *Certified mailing list (Type II only).* Current Clark County assessor map(s) showing the property(ies) within a 300-foot radius of the site, per the requirements in VMC 20.210.050 and 20.210.060, decision-making procedures, and one set of stamped and addressed envelopes and one set of mailing labels with the names and addresses of owners of all properties within the 300-foot radius. Such list shall be certified as accurate and complete by the Clark County assessor or a title company. For non-owner-occupied properties, provide one set of stamped and addressed envelopes and one set of mailing labels addressed to “occupant” as can be determined from available county assessor records.

20.290.040 Approval Criteria.

A. *Type I Variance.* The Planning Official may grant a Type I Variance upon demonstration by the applicant of compliance with all of the following approval criteria:

1. Unusual circumstances or conditions apply to the property and/or the intended use that do not apply generally to other property in the same vicinity or district;
2. The variance requested is the least necessary to relieve the unusual circumstances or conditions identified in Subsection (1) above.
3. The authorization of such variance will not be materially detrimental to the public welfare or injurious to property in the vicinity or district in which property is located.

B. *Type II Variance.* The Planning Official may grant a Type II Variance upon demonstration by the applicant of compliance with all of the following approval criteria:

1. Unusual circumstances or conditions apply to the property and/or the intended use that do not apply generally to other property in the same vicinity or district;
2. Such variance is necessary for the preservation and enjoyment of a substantial property right of the applicant such as is possessed by the owners of other properties in the same vicinity or district;
3. The variance requested is the least necessary to relieve the unusual circumstances or conditions identified in Subsection (1) above;
4. The authorization of such variance will not be materially detrimental to the public welfare or injurious to property in the vicinity or district in which property is located;
5. Any impacts resulting from the variance are mitigated to the extent practicable; and
6. If more than one variance is being requested, the cumulative effect of the variances results in a project that is still consistent with the overall purpose of the underlying zoning district.

20.290.050 Time Limit of Approval.

A. *Time limit.* Authorization of a variance shall be void after five years, unless a building permit has been issued and substantial construction has taken place. Subdivision variances shall be valid for the term of the preliminary plat.

B. *Extension.* Upon written request by the applicant and payment of the required fee pursuant to Chapter 20.190 VMC, the Planning Official may extend the authorization for a maximum of one year.

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20.300
LAND DIVISION

Sections:

20.310 Boundary Adjustments.

20.320 Subdivisions.

20.330 Binding Site Plans.

CHAPTER 20.310
BOUNDARY ADJUSTMENTS

Sections:

20.310.010 Purpose.

20.310.020 Applicability.

20.310.030 Approval Process.

20.310.040 Submittal Requirements.

20.310.050 Approval Criteria.

20.310.010 Purpose.

Purpose. The purpose of this chapter is to provide rules and criteria governing approval of minor boundary adjustments between or among two or more legal lots to ensure that the newly-reconfigured lots meet applicable dimensional standards, if so requested by a property owner.

20.310.020 Applicability.

Boundary Adjustments may be recorded without review and approval of the City. Property owners may, however, request that a Boundary Adjustment be reviewed and approved by the City of Vancouver prior to being recorded with the Clark County Auditor to determine compliance with applicable lot dimensions, setbacks and other lot standards.

20.310.030 Approval Process.

A. *Decision-making process.* Boundary Adjustments shall be reviewed by means of a Type I procedure.

B. *Time limit for recording.* A legal description of the newly-configured lots approved by the Planning Official shall be recorded with the Clark County Auditor within 90 days of the date of the written decision, unless a longer time period is specified in the decision.

C. *Extension.* By means of a Type I procedure, the applicant may request an extension of the recording date for a period not to exceed one year provided that no changes are made from the original approval.

20.310.040 Submittal Requirements.

Applicants shall submit the following documentation as part of a request for a Boundary Adjustment compliance check:

A. Completed application form including signatures of all property owners involved in boundary line adjustment.

B. Survey. The proposed boundary line adjustment shall be prepared by a surveyor in accordance with the provisions of the Survey Recording Act (Chapter 58.09 RCW), clearly showing the following:

1. The dimensions of the existing property/properties involved.
2. The location of any improvements (structures, septic system, etc.).
3. The location and dimension of any access or utility easements.
4. The dimensions of the proposed new lot lines.
5. North arrow.
6. Zoning of each involved property.

C. Recorded deed. Copy of all property owners' recorded deeds, verifying current ownership.

D. Sales history. Complete sales history of all parcels since 1969. Sales history is comprised of copies of all deeds or real estate contracts showing previous owners or divisions for the properties involved. It is used to verify the legal creation of the parcel and is available from either a title company or the Clark County assessor's office. This is not required if the request involves lots within a subdivision which have not been altered or further divided.

E. Letter of intent. Letter of intent explaining the purpose of the request. The letter should also include information that may be helpful in evaluating the request.

F. Existing conditions or related development restrictions. Copies of existing conditions of approval, covenants, restrictions and/or easements.

G. Application fee. Application fee as contained in Chapter 20.190 VMC.

20.310.050 Approval Criteria.

A. *Approval criteria.* The Planning Official shall approve, approve with conditions or deny a request for a boundary adjustment in writing based on findings addressing all of the following criteria:

1. No additional parcel(s) shall be created by the boundary adjustment;

2. The lot and location of any structure(s) on the lots shall comply with the minimum density and height requirements of the base zoning district, unless a variance is sought in conjunction with the request per the requirements of Chapter 20.290 VMC. The lot shall comply with the Lot Dimensions and Coverage, and Building Placement and Buildout, per the most appropriate Building Type, as determined by the Planning Official, or their representative, per Chapter 20.420 Building Types. Per Chapter 20.410 Zoning Districts, lots in the Low-Scale and Medium-Scale Neighborhoods developed or approved before June 30, 2026, are exempt from the requirement for minimum density/maximum lot size. However, if a site is completely redeveloped, the new development must comply with the minimum density requirements of the base district.
3. Legal access shall be provided to each of the lots; and

B. Exemptions from dedications. A boundary adjustment is not considered a development action for purposes of determining whether a dedication or improvement is required.

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CHAPTER 20.320
SUBDIVISIONS

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20.320.010 Purpose.

Purpose. The purpose of this Chapter is to implement the policies of the various applicable state statutes including, but not limited to, Chapter 58.17 RCW, Findings; Chapters 35.63 and 65.08 RCW, and the City of Vancouver Comprehensive Plan. The regulations contained herein are intended to:

A. Promote the effective utilization of land and infrastructure;

B. Make adequate provision for the housing, commercial and industrial needs of the City, the county and the region;

C. Prescribe procedures for the subdivision of land in accordance with officially adopted plans, policies and standards, including the provisions of the Development Code (Title 20 VMC); and

D. Provide for the efficient processing of subdivision applications without undue delay.

20.320.015 Applicability.

A. *Short subdivisions/Unit lot subdivisions*. A short subdivision or unit lot subdivision is a land partition containing nine (9) or fewer lots.

B. *Subdivisions*. A subdivision is a land partition containing ten (10) or more lots.

C. E*xemptions*. The provisions of this Chapter shall not apply to the following:

1. Cemeteries and burial plots while used for that purpose.

2. Divisions of land into lots or tracts, each of which is 1/64 of a section of land or larger, or 10 acres or larger, if the land is not capable of description as a fraction of a section of land. For purposes of computing the size of any lot under this item which borders on a street or road, excluding limited-access streets or roads, the lot size shall be expanded to include that area which would be bounded by the centerline of the road or street, and the side lot lines of the lot running perpendicular to such centerline.

3. Divisions and/or acquisitions of land pursuant to condemnation or threat of condemnation by a government agency public purposes.

4. Divisions of land made by testamentary provisions, or the laws of descent.

5. Divisions of land made by subjecting a portion of a parcel or tract of land to Chapter 64.34 RCW (Condominiums) if the Planning Official has approved a binding site plan in accordance with Chapter 20.330 VMC.

6. Divisions of land into lots or tracts classified for industrial or commercial use, when the Planning Official has approved a binding site plan for use of the land in accordance with Chapter 20.330 VMC.

7. A division made for the purpose of adjusting boundary lines which does not create any additional lots, tracts, parcels, sites or divisions, nor any lots, tracts, parcels, sites or divisions which contain insufficient area and/or dimensions to meet the minimum requirements for width, depth and/or area for a lot.

8. Divisions created by a court order that result in lots that conform to the requirements of this Title.

20.320.020 Approval Process.

A. *Decision-making process*.

1. *Short subdivisions and unit lot subdivisions*. The Planning Official shall approve, approve with conditions or deny an application for a short subdivision preliminary plat by means of a Type II procedure, pursuant to VMC 20.210.050, using approval criteria contained in VMC 20.320.040. The Hearing Examiner shall approve, approve with conditions or deny an application for a subdivision preliminary plat by means of a Type III procedure, pursuant to VMC 20.210.060, using approval criteria contained in VMC 20.320.040.

B. *Term of preliminary plat approval*. Approval of a preliminary short subdivision and unit lot subdivisions, or subdivision shall be valid for a period of seven years, except as provided by RCW 58.17.140(3)(b), subject to verification of utility availability, during which time an application for final plat meeting all the requirements of this chapter and all conditions of preliminary plat approval shall be made; provided, that extensions of preliminary short subdivision or subdivision plat approval may be granted in accordance with the procedures and criteria set forth in subsection D of this section.

C. *Phasing*. The developer may develop the short subdivision/unit lot subdivisions, or subdivision in phases. Any phasing proposal shall be submitted with application materials for the preliminary plat and approved by the review authority, except that the Planning Official may approve a phasing plan for an approved short subdivision or subdivision by means of a Type I procedure, governed by VMC 20.210.040, Type I Applications, upon finding that:

1. The phasing plan includes all land identified within the legal notice of the approval hearing;
2. The sequence of phased development is identified by map;
3. Each phase shall constitute an independent project meeting all of the requirements for density, open space, public and private infrastructure, landscaping, pedestrian and vehicle circulation, etc.; and
4. The director of public works and transportation manager have approved the necessary documents to determine that all streets, sanitary and storm sewers, water and other public improvements, including but not limited to drainage improvements, and erosion control measures are assured.

D. *Extensions*. Extension requests shall be reviewed in accordance with the following criteria:

1. An initial one-year extension request, which has been filed at least 30 days prior to the expiration of the seven-year period, shall be reviewed by the Planning Official by means of a Type I procedure, as governed by VMC 20.210.040, upon showing that the applicant has attempted in good faith to meet the conditions for the final plat within the seven-year period.

2. Two additional two-year extension requests may be granted by the Planning Official by means of a Type II procedure, as governed by VMC 20.210.050, providing the applicant demonstrates compliance with all of the following criteria:

   a. The applicant has pursued compliance with all conditions of preliminary plat approval and submitting the final plat in good faith; and

   b. There have been no changes to the comprehensive plan, zoning ordinance, development standards or other applicable codes that are inconsistent with the approved preliminary plat.

3. Short subdivisions, unit lot subdivisions, or subdivisions that have been approved for phased development pursuant to subsection C of this section may receive subsequent two-year extensions in accordance with the criteria of subsection (D)(2) of this section so long as at least one phase received final plat approval and was properly recorded within four years prior to each such subsequent extension request.

E. *Transportation concurrency*. The approval of extensions notwithstanding, the applicant shall comply with the provisions of Chapter 11.70 VMC, Transportation Concurrency.

F. *Land transfer agreements*. Agreements to transfer land prior to final plat are authorized; provided, that the performance of an offer or agreement to sell, lease or otherwise transfer a lot, tract or parcel of land following preliminary plat or short plat approval is expressly conditioned on the recording of the final plat or short plat containing the lot, tract or parcel and shall comply with the requirements of 58.17.205 RCW.

20.320.030 Preliminary Plat Application Requirements.

A. *Application – Fees*. The applicant must submit a completed application form as prescribed by the Planning Official.

B. *Submittal Requirements*. Applications for preliminary short subdivisions or subdivisions shall be on a scale legible for digital reproduction and shall include the following:

1. *Existing conditions plan*. The existing conditions plan shall include pertinent survey data compiled as a result of a survey made by or under the supervision of a licensed land surveyor in the state of Washington and shall include the following information:

   a. A vicinity map showing streets and access points, pedestrian and bicycle pathways, transit stops and utility locations within a 500-foot radius of the site;

   b. The site size, dimensions and orientation relative to true north;

   c. Remaining easements;

   d. The location, name and dimensions of public and private streets adjoining the site, identifying whether the streets are public or private;

e. Location, dimension, and purpose of existing easements;

f. The location of existing structures and other improvements on the site, including buildings, driveways, parking, loading, pedestrian and bicycle paths, passive or active recreational facilities or open space and utilities;

g. Elevation of the site at two-foot contour intervals for grades zero percent to 10 percent and at five-foot contour intervals for grades more than 10 percent;

h. The location of natural conditions such as:

i. Water bodies, the 100-year floodplain, aquatic habitats, natural drainage courses, wetlands, springs, seeps, closed depression areas, groundwater elevations, aquifers, and wellhead protection areas;

ii. Geological hazard areas such as slopes in excess of 15 percent, unstable or weak soils, soils with high erosion potential, rock outcroppings, and areas of healthy native soils and hydraulic conductivity;

iii. Existing vegetation including stands of trees and individual trees, additional information necessary to comply with Chapter 20.450.035 VMC Landscaping and Tree Conservation, and areas of wildlife habitat.

2. *Preliminary plat*. The proposed preliminary plat shall include the name of the subdivision or short subdivision which shall not be named the same as an existing plat recorded in Clark County, Washington, along with the following:

a. The proposed site and its dimensions and area.

b. Proposed lots, tracts and easements, including dimensions, individual lot areas and total acreage.

c. Abutting properties or, if abutting properties extend more than 100 feet from the site, the portion of abutting properties within 100 feet of the site, and the approximate location of structures and uses on abutting property or portion of the abutting property.

d. The location and dimensions of development, including but not limited to the following:

i. Streets and other rights-of-way and public or private access easements on and adjoining the site;

ii. Vehicle and bicycle parking and pedestrian bicycle and vehicular circulation areas;

iii. Loading and service areas;

iv. Active or passive recreational or open space features;

v. All utilities;

vi. Existing structures to be retained on the site and their distance from proposed property lines;

vii. Proposed structures on the site, including signs and fences, and their distance from property lines if known at time of land division;

viii. The location and type of proposed outdoor lighting and existing lighting to be retained if known at time of land division; and

ix. Boundary delineation of any wetlands including required buffers and shoreline setback lines if applicable.

3. *Narrative*. The narrative shall include the following:

   a. A comprehensive narrative addressing how the development complies with preliminary plat approval criteria in VMC 20.320.040 and the technical standards in VMC 20.320.070; other applicable standards of this title and the policies of the comprehensive plan outlined by staff as being applicable to the proposed development;

   b. Description of the uses proposed for the site;

   c. Phasing plan, if applicable;

   d. Any variances requested pursuant to the regulations in Chapter 20.290 VMC;

   e. Existing covenants or restrictions and easements, if applicable; and

   f. History of any previous subdivisions and short subdivisions of the property.

4. *Supplementary information*. The following supplemental information shall also be submitted unless otherwise indicated in parentheses:

   a. Environmental checklist that complies with Chapter 20.740 VMC, SEPA Regulations (if applicable);

   b. Legal description;

   c. Geotechnical/soils survey, if applicable;

   d. Tree, vegetation, and soil plan that complies with the requirements of Chapter 20.450.035 VMC Landscaping and Tree Conservation;

   e. Preliminary grading, erosion prevention and stormwater plans.

      i. Grading plan indicating areas of soil protection and compaction prevention;

      ii. Erosion prevention measures as required in Chapter 14.24 VMC; and

      iii. Stormwater site plan as required in Chapter 14.25 VMC.

f. Archaeological predetermination report, if applicable, that complies with the requirements of Chapter 20.710 VMC, Archaeological Resource Protection;

g. Repealed by Ord. M-4402.

h. Clark County public health development review evaluation form or copy of application to Clark County public health;

i. *Certified mailing list*. Current Clark County assessor map(s) showing the property(ies) within a 300-foot radius of the site, per the requirements in VMC 20.210.050 and 20.210.060, decision-making procedures, and one set of stamped and addressed envelopes and one set of mailing labels with the names and addresses of owners of all properties within the 300-foot radius. Such list shall be certified as accurate and complete by the Clark County assessor or a title company. For non-owner-occupied properties, provide one set of stamped and addressed envelopes and one set of mailing labels addressed to "occupant" as can be determined from available county assessor records;

j. Traffic study or trip generation and distribution report in compliance with VMC Title 11.

20.320.040 Preliminary Plat Approval Criteria.

Approval criteria. To grant approval of a preliminary short subdivision or subdivision, the applicant must demonstrate compliance with all of the following criteria:

A. *Public facilities provision*. Appropriate provisions to the extent necessary to mitigate an impact of the development have been made for transportation, water, storm drainage, erosion control and sanitary sewage disposal methods that are consistent with the City's current ordinances, standards and plans;

B. *Proposed improvements*. Appropriate provisions have been made for proposed streets, alleys and public ways, utilities and other improvements that are consistent with the City's current ordinances, standards and plans, and Department of Health and/or Washington State Department of Transportation standards and plans, where applicable;

C. *Open space and dedications*. Appropriate provisions to the extent necessary to mitigate an impact of the development have been made for open space, parks, schools, dedications, easements and reservations;

D. *Physical characteristics*. The design of the proposed short subdivision or subdivision site has taken into consideration the physical features of the site, including but not limited, to: topography, soil conditions, susceptibility to flooding, inundation or swamp conditions, steep slopes or unique natural features such as wildlife habitat or wetlands;

E. *Re-platting of existing subdivisions*. When re-platting an existing subdivision, the short subdivision or subdivision shall comply with all of the terms and conditions of the existing subdivision's conditions of approval;

F. *Compliance with all requirements of this title*. The proposed short subdivision or subdivision complies with all applicable requirements of this title unless modified through the approval; and

G. *Compliance with State requirements*. That the proposed short subdivision or subdivision complies with the requirements of RCW 58.17.110.

H. *Alleys*. Where feasible, the use of alley loaded units is encouraged. Buildings served by an alley may increase their maximum impervious area by 15% over the building type maximum.

20.320.050 Final Plat Application.

A. *Final plat application and fees*. A complete application, including all supplemental documentation and correct number of copies, shall be filed with the Planning Official along with all associated fees per Chapter 20.190 VMC.

B. *Proposed final plat*. The proposed final plat shall be prepared by a surveyor in accordance with the provisions of the Survey Recording Act (Chapter 18.90 RCW) as it now exists or hereafter amended. The plat shall consist of one or more pages of a size acceptable to the recording authority, and drawn to a minimum scale of one inch equals 50 feet. The drawing shall contain the following:

1. Date, north arrow and scale;
2. Name of subdivision and applicable project numbers;
3. Letter height must not be less than 0.08 inches;
4. Heavy dashed line around the exterior boundary;
5. All section, township, municipal and county lines lying within or adjacent to the subdivision;
6. Legend;
7. The location of all monuments or other evidence used as ties to establish the subdivision's boundaries, and all permanent monuments with linear dimension, including dimensions to every curb screw;
8. The boundary of the subdivision with complete bearings and linear distances;
9. The length and bearings of all straight lines and the radii, arcs and semi-tangents of all curves;
10. The length of all lot lines, together with bearings and other data necessary for the location of any lot line in the field;

11. Identification of areas to be dedicated or reserved clearly indicated with location, size and purpose. These may include rights-of-way width, public easements, private easements, specific utility easement and type, open space tracts, wetland, etc.;
12. Numbers assigned to all lots, indication of the acreage and/or square footage of each lot, and letters assigned to all blocks within the subdivision;
13. Surveyor's certification on the face of the plat by a registered land surveyor:
    a. I, [insert printed name of licensed surveyor], registered as a land surveyor by the state of Washington, certify that this plat is based on an actual survey of the land described herein, conducted by me or under my supervision. That the distances, courses, and angles are shown hereon correctly, and that the monuments, other than the monuments approved for setting at a later date, have been set and lot corners staked on the ground as depicted on the plat.
    b. Signature of Licensed Surveyor: _____ Date Signed:_____
    c. Professional Land Surveyor No. _____ Sealed
14. Signature blocks for the following:
    a. Director of public works;
    b. Director of community development;
    c. Clark County public health signature or a letter from public health is provided confirming completion of the public health's development review process;
    d. County assessor;
    e. Auditor's certification.

C. Additional final plat application requirements:
    1. Final Performance and Maintenance Bond (if applicable);
    2. Legal description of boundary which has been certified by the land surveyor with seal and signature as being an accurate description of the lands actually surveyed;
    3. Mathematical closures;
    4. Certification of platting from a title company;
    5. *Dedication of Plat*. A plat certificate shall be provided, including dedications, if any (RCW 58.17.165). The intention to dedicate shall be evidenced by the owner by the presentment for filing of a final plat, or modification showing the dedication thereon; and the acceptance by the public shall be evidenced by the approval of such plat for filing;
    6. Treasurer's certificate;

7. Conditions, covenants and restrictions, notes, and/or binding agreements as required by this code, SEPA, conditions of preliminary plat approval or other law, including but not limited to the following:
    a. Private road maintenance agreement (if applicable);
    b. Recorded conservation covenant (if applicable);
8. Final tree and landscaping plan, including street trees;
9. Other supporting documents required pursuant to the preliminary plat decision;
10. *Mylar Submittal*. Upon compliance of the final plat and the construction plans with all preliminary plat conditions and with all applicable adopted statues and local ordinances, the Planning Official shall request submittal of the final plat mylar(s) for signature.

20.320.060 Final Plat Approval.

A. *Final plat procedure*.
    1. An applicant requesting final approval of a plat shall submit to the Planning Official copies of the materials specified in VMC 20.320.050.
    2. The Planning Official shall coordinate the final plat review among the appropriate city and/or county departments.
    3. Upon consideration of the approval criteria below, the Planning Official shall forward the final plat to the public works director and community development director for signature.
        a. The plat is in proper form for recording as established by the submittal requirements;
        b. The final plat map and mathematical closures are in compliance with the survey standards set forth in Chapter 58.17 RCW;
        c. All required improvements have been completed or security acceptable to the city in lieu of completion guaranteeing that all required improvements will be completed;
        d. The final plat is in conformance with conditions of preliminary plat approval;
        e. The final plat complies with the requirements of this chapter and all applicable adopted states and local ordinances.
    4. The final plat shall be recorded with the Clark County auditor. It shall be the responsibility of the applicant to record the plat with the county auditor.
    5. Upon recording of the final plat with the Clark County auditor, the applicant shall submit two full-size copies of the actual recorded mylar to the Planning Official.
B. *Construction prior to final plat approval*.

1. In lieu of the completion and acceptance of any required public or private improvements prior to approval of a final plat, the director of public works may accept an escrow or other form of security acceptable to the city, in an amount and with conditions satisfactory to him. The security to the city shall be sufficient to ensure that the actual construction and installation of such improvements occur within a period specified in the agreement by the director of public works and completion of the improvements in accordance with the agreement shall be enforced by the director of public works and/or transportation division manager by appropriate legal and equitable remedies.
2. Construction of streets and utilities shall not start prior to the approval of the civil engineering construction plans by the director of public works. However, rough grading operations may proceed before the plans are approved by the director of public works under the following conditions:
    a. The grading plan and erosion control plans, are submitted along with an application for the grading permit; including applicable fees;
    b. The grading plan is in conformance with the approved preliminary plat;
    c. The grading plan will not be in conflict with the street profiles and drainage structure plans;
    d. A hold harmless agreement signed by the applicant in the case of mandated change to the engineering plans associated with the plat; and
    e. These plans receive approval from the department of public works and/or transportation division.

20.320.070 Technical Standards.

A. Subdivision Layout and Required Improvements.

1. *Principles of acceptability*. The short subdivision or subdivision shall conform to the comprehensive plan. The short subdivision or subdivision shall conform to the requirements of the state law and to the standards established by this title.
    a. *Street improvement standards*. All proposed streets and street improvements shall comply with the provisions of VMC Title 11 and approved transportation standards details on file with the public works department.
    b. *Blocks*. The length, width and shape of blocks shall be designed to ensure multimodal connectivity and safety, convenient access, functional circulation, and control for all modes. The provision of adequate building sites for the uses contemplated and topographic limitations and opportunities should also be considered.

c. Blocks shall not exceed 800 feet in length between street lines, except blocks adjacent to arterial streets or unless a previous adjacent layout or topographical conditions justify variation. The recommended minimum distance between intersections of arterial streets is 1,800 feet. Minimum length of a block shall not be less than 100 feet.

d. E*asements*.

   i. *Utility lines*. Easements for sewers, drainage, water lines, electric lines or other public use utilities shall be provided. The size and location of the easement shall be reviewed and approved by the appropriate utility provider.

   ii. Watercourses. If a subdivision is traversed by a watercourse, such as a drainageway, channel or stream, there shall be provided a stormwater easement for the width of the watercourse plus 15 feet on each side of the watercourse. Streets or parkways parallel to a major watercourse may be required.

   iii. Pedestrian/bicycle ways in and through subdivisions. A pedestrian/bicycle way with a minimum width of 16 feet may be required through the middle of the block when required by the planning official or transportation manager for public convenience and safety when adjacent to parks, trails or other transportation infrastructure; 12 feet of the 16-foot corridor shall be paved in a durable material.

e. *Flag lots*. Flag lots may be permitted; provided, that the minimum width of the flag stem be 15 feet for a single lot and 20 feet for a shared flag access, and it is in compliance with fire access standards contained in VMC 16.04.150. No more than four lots may be accessed from a single flag stem. A private maintenance agreement shall be recorded for driveways which serve more than one lot.

f. *Lot side lines*. Side lines, as far as practical, shall run at right angles to the street on which the lot faces.

g. *Lot frontage*. With the exception of flag lots, all lots shall have a minimum frontage of not less than 16 feet on either a public or private street.

h. *Parks and playgrounds.* The review authority shall see that appropriate provision is made for parks and playgrounds to serve the proposed subdivision.

i. *Existing trees*. All subdivision developments shall comply with the tree and vegetation management provisions contained in Chapter 20.450.035 VMC, Landscaping and Tree Conservation.

2. *Procedure for installation*. In addition to other requirements, improvements installed by the developer of the short subdivision or subdivision, either as a requirement of these regulations or at his own option, shall conform to the requirements of this title and improvement standards, specifications, inspections and procedures as set forth by the city and administered by the department of public works and community development department, and shall be installed in accordance with the following procedures:

   a. Public work shall not commence until civil engineering plans, prepared in accordance with the requirements of the city, have been approved by the city: all required permits have been obtained and a preconstruction conference has been conducted. Public work shall not be commenced until the city has been notified in advance.

   b. If work has been discontinued for any reason, it shall not be resumed until the city has been notified.

   c. Public improvements shall be constructed under the inspection and to the satisfaction of the director of public works or their designee. The city may require changes in typical sections and details in the public interest if unusual conditions arise during construction to warrant the change.

   d. All underground utilities, sanitary sewers and storm drains installed in the streets by the developer of the short subdivision or subdivision shall be constructed prior to the surfacing of streets. Stubs for service connections and underground utilities and sanitary sewers shall be placed to a length precluding the necessity for disturbing the street improvements when surface connections are made.

   e. A plan showing all improvements “as built” shall be filed with the development review services upon the completion of the improvements.

   f. Public improvements required. Improvements to be installed at the expense of the owner of the short subdivision or subdivision are as follows:

      i. All full-width streets, sidewalks, curbs and gutters, including alleys, within or adjacent to the subdivision or short subdivision; streets adjacent but only partially within the short subdivision or subdivision; and the extension of short subdivision or subdivision streets to the intercepting paving line of existing streets with which short subdivision or subdivision streets intersect shall be graded for the full right-of-way width and improved to the city’s improvement standards and specifications.

ii. *Half-width roads*. In situations where the property being developed does not permit full-width public streets, half roads having a minimum right-of-way or easement and roadway improvement width of one-half of the design width may be permitted when placed adjacent to adjoining property so long as there is no physical obstruction or development constraint prohibiting the completion of the street on such adjoining property; provided, that public street half-width shall be a minimum of 20 feet wide. Public half-width streets serving six or more parcels shall be required to dedicate additional right-of-way as necessary to provide for a minimum of one foot of right-of-way beyond the edge of the sidewalk. Further, additional right-of-way or easement may be required between the edge of the roadway and the property line for construction clearance, slopes or other features. Half-width public streets shall serve a maximum of 200 ADT. If the number of trips generated is greater than 200 ADT, the street shall be widened to full-width standards. Parking shall be prohibited along any half-width street and necessary signs and pavement markings shall be the responsibility of the developer.

iii. *Benchmarks*. When required, elevation benchmarks shall be established within the subdivision with elevations to U.S. Geological Survey datum.

iv. *Drainage systems*. Surface drainage systems shall be provided within the subdivision or short subdivision. The design of the drainage system within the short subdivision or subdivision shall be in accordance with the standards set forth by Chapter 14.25 VMC, as administered by the department of public works.

v. *Erosion control and stormwater quality*. Facilities shall be provided within the short subdivision or subdivision to enhance stormwater runoff and protect existing and future drainage facilities. The design of the erosion control and stormwater quality system shall be in accordance with the standards set forth by the city, pursuant to Chapters 14.24 and 14.25 VMC, as administered by the department of public works.

vi. *Sanitary sewers*. Sanitary sewers shall be installed to serve the short subdivision or subdivision and to connect the short subdivision or subdivision to existing mains.

vii. *Water system*. Water lines with valves and fire hydrants serving the short subdivision or subdivision and connecting the subdivision or short subdivision to the city mains shall be installed according to specifications of the city, pursuant to VMC Title 14, Water and Sewers, as administered by the department of public works.

viii. *Sidewalks*. Sidewalks shall be installed along both sides of each street within and/or adjacent to the short subdivision or subdivision, unless exempted by approval of a roadway modification, by the review authority and along pedestrian ways of the short subdivision or subdivision. Sidewalks shall be installed according to the specifications of the city, pursuant to VMC Title 11, Streets and Sidewalks, as administered by the department of public works.

ix. *Street trees*. Street trees shall be planted along both sides of each street within the short subdivision or subdivision and along any portion of the short subdivision or subdivision that fronts upon an existing street. Street trees shall be planted 30 feet on-center and be of a species approved by the city Planning Official.

x. *Other*. When special conditions are encountered in the plans for improvements such as fill section requiring the placement of guardrails, ditches requiring drainage appurtenances, or other protection against erosion such as slopes requiring use of sod and/or seeding, such improvements shall be considered as an integral part of the improvement construction. Such special improvements shall be approved by the director of public works or transportation manager prior to commencement of construction.

g. *Conditions of agreements*.

i. *Short Subdivisions or Subdivisions*. Before the public works and community development directors' approval is certified on the plat of a subdivision, the developer shall either install required improvements and repair any damage to the existing streets or other facilities damaged due to the development of the subdivision, or at the city's discretion execute and file with the city clerk an agreement between herself/himself and the city specifying a period not to exceed two years in which the required improvements and repairs shall be completed and providing that if work is not completed within the period specified, the city may complete the work and recover the full cost and expense from the subdivider.

ii. *Escrow or other form of security acceptable to the city required – Public improvements.* The city may accept from the developer of any short subdivision or subdivision, in lieu of completion and acceptance of certain approved required public improvements prior to approval of a final plat, an escrow agreement or other form of security acceptable to the city which secures and provides for the actual construction and installation of the improvements of the conditions of plat approval and subject to the following:

(A). The use of escrow in lieu of construction completion shall be limited to work items representing end-of-project issues that are generally outside the control of the developer. Examples may include: top layer of pavement, landscaping or sidewalk construction in unfavorable weather seasons, delayed delivery of long-lead-time items like street lighting or traffic signal equipment. The use of escrow shall not be approved for underground utility installation.

(B). The developer shall submit a written request and the appropriate forms to the director of public works, or designee, for review, which shall include the following information:

(1). A scheduled unit cost breakdown for project work to be completed presented as Exhibit "A"; an agreement will not be accepted without an approved unit cost breakdown for the project.

(2). A draft of the escrow agreement in a form approved by the city.

(3). Any other documents deemed necessary by the city.

(4). Applicable processing fee.

(C). Upon approval of an escrow or other form of security acceptable to the city, recording of the final plat is allowed, provided all other conditions to be met prior to final plat approval have been satisfied.

iii. *Escrow or other form of security acceptable to the city required – Private improvements*. The city may accept from the developer of any subdivision or short subdivision, in lieu of completion and acceptance of certain approved required private improvements prior to approval of a final plat, an escrow agreement or other form of security, acceptable to the city, which secures and provides for the actual construction and installation of the private improvements or the performance of the conditions of agreement for plat and subject to the following:

(A). Use of escrow or other form of security acceptable to the city in lieu of completion and acceptance of such required private improvements shall be limited to:

(1). Approved private transportation system improvements, including sidewalks and streetlights, provided emergency access improvements are constructed on site as needed;

(2). Approved private stormwater collection and management facilities;

(3). Approved landscaping and trees to meet minimum on-site tree density, including installation and maintenance costs.

(B). The developer shall submit a written request along with the appropriate forms to the Planning Official for review.

(C). Each escrow or other form of security acceptable to the city request shall include the following:

(1). A scheduled cost breakdown for project work to be completed presented as Exhibit "A"; an escrow agreement shall not be accepted without an approved unit cost breakdown for the remaining improvements.

(2). A draft escrow agreement in a form provided by the city.

(3). An irrevocable license signed by the owner of subject property to run with the property which provides the city with the right to allow the employees, agents, or contractors of the city to go on access the subject property for the purpose of inspecting and, if necessary, doing completing the work or making the improvements covered by the escrow or other form of security acceptable to the city.

(4). Any other documents deemed necessary by the city.

(5). Applicable processing fee.

(D). Upon approval of an escrow or other form of security acceptable by to the city, recording of the final plat is allowed, provided all other conditions required to be met prior to the final plat approval have been satisfied.

iv. *Amount of escrow or other form of security acceptable to the city*. Such assurance of full and faithful performance shall be for a sum approved by the Planning Official as sufficient to cover the cost of the improvements and repairs, including related engineering and incidental expenses.

v. *Failure to carry out agreement*. In the event the developer of the short subdivision or subdivision fails to carry out provisions of the agreement and the city has unreimbursed costs or expenses resulting from such failure, the escrow or other form of security acceptable to the city shall be forfeited and the money shall be paid to the city to defray its costs. If the amount of the escrow or other form of security acceptable to the city exceeds the cost and expense incurred by the city, the city shall release the remainder and if the amount of the escrow or other form of security acceptable to the city is less than the cost and expense incurred by the city, the subdivider shall be liable to the city for the difference.

vi. *Guarantee of workmanship and materials*. It shall be required that a 110 percent maintenance bond or bonds be posted to guarantee all workmanship and material for a period of one year from the date of the acceptance of the improvements by the city. This is provided that in the judgment of the director of public works any defects are not the result of public abuse, misuse or acts of God. City inspection does not give relief from the one-year guarantee on workmanship.

vii. *Release of escrow or security*. Upon completion of required improvements, the subdivider shall request in writing that the Planning Official or director of public works release all or a portion of the funds held in escrow. Such improvements shall be inspected and accepted as complete by the city prior to the release of any such escrow funds, or portion thereof.

B. *Public improvements plan*. Where public improvements are required, plans for such improvements shall be submitted to the director of public works. Public improvements shall be designed by or under the direct supervision of a licensed professional civil engineer as required by statute, pursuant to Chapters 18.08, 18.43, and 18.96 RCW, and shall meet, as a minimum, the requirements of this section. The engineer shall certify the plans by seal and signature. Such certification shall contain the following: (1) subdivision name; (2) name, mailing address, and telephone number of engineer preparing the plan; and (3) date, including month and year. All public improvement plans shall be submitted for review and approval by the director of public works.

C. *Monument-setting*. All monuments set in subdivisions shall be at least one-half-inch by 24-inch steel bar or rod, or equivalent, with durable cap imprinted with the license number of the land surveyor setting the monument.

1. *Centerline monument-setting*. After paving, except as provided in subsection (C)(4) of this section, monuments shall be driven flush with the finished road surface at the following intersections:

   a. Street centerline intersections;

   b. Points of intersection of curves if placement falls within the paved area or otherwise, at the beginnings and endings of curves;

   c. Intersections of the plat boundary extensions and street centerlines.

2. *Property line monument-setting*. All front corners, rear corners, and beginnings and endings of S curves shall be set with monuments, except as provided in subsection (C)(4) of this section. In cases where street curbs are concentric and/or parallel with front right-of-way lines, front property-line monuments may be provided by brass screws or concrete nails with the surveyor's license number at the intersections of curb lines and the projections of side property lines. If curb monuments are used, it shall be noted on the plat, and also that such monuments are good for projection of line only and not for distance.

3. *Post-monument-setting*. All monuments for the exterior boundaries of the short subdivision or subdivision shall be set and referenced on the plat prior to plat recording. Interior monuments need not be set prior to recording if the developer certifies that the interior monuments shall be set within 90 days of final short subdivision or subdivision construction inspection by the director of public works, and if the developer guarantees such interior monument-setting.

   a. The developer shall sign the following certification, the existence of which shall be noted on the plat, if post-monument-setting of the interior monuments is chosen:

DEVELOPER'S CERTIFICATION FOR POSTMONUMENTATION

I, certify that the post-monument-setting of the interior monuments of this plat shall be accomplished within ninety (90) days of final acceptance of subdivision construction by the Director of Public Works for the City of Vancouver, Clark County and State of Washington.

(Signature)

b. The land surveyor who performs any post-monument-setting shall certify that the interior monuments have been set in compliance with the final plat, and shall record the following certification with the county auditor:

I, certify that I have set the interior monuments for (name of subdivision) a subdivision plat recorded in Book (___), page (___), Records of Clark County, and that said monuments are set in compliance with said final plat.

Dated this (___) day of (_____), 20__.

(License number, seal, and signature of surveyor).

c. If the surveyor cannot certify that the monuments are in compliance with the final plat, the discrepancy shall be resolved by filing an amended final plat in accordance with the provisions of VMC 20.320.080(D)(1).

4. *Post-monument-setting bonds*. In lieu of setting interior monuments prior to final plat recording as provided in VMC 20.320.080(C)(2), the director of public works may accept a bond in an amount and with surety and conditions satisfactory to him/her, or other secure method as the director of public works may require, providing for and securing to the city the actual setting of the interior monuments as provided in VMC 20.320.080(C)(2) and to be enforced by the director of public works by appropriate legal and equitable remedies.

D. *Survey standards*. All surveys shall comply with standards set forth by state statutes, drafting standards of this title, and Chapter 332-130 WAC, except that linear closures after azimuth adjustment shall be at least a ratio of 1:10,000 for WAC 332-130-090. Where conflicts are identified, the most restrictive standard shall prevail.

1. *Elevations of vertical information*. Where required, any elevations or vertical information shall have an accuracy of third-order specifications as published by the U.S. Department of Commerce in a bulletin entitled "Classification, Standards of Accuracy, and General Specifications of Geodetic Control Surveys," and bench marks with the datum used shall be shown on the plat.

E. *Drafting standards*.

1. *Preferred scale proportions*. The preferred scale proportions for preliminary and final plat are ratios as follows:

   a. 1:600 or one inch equals 50 feet.

   b. 1:1,200 or one inch equals 100 feet and 1:2,400 or one inch equals 200 feet; but in no case shall the proportion exceed 1:2,400.

2. *Final plat drawing requirements*. The final plat shall be drawn with ink upon three-mil mylar film, or equivalent; sheet size as required by recording agency with a one-inch border on each side.

3. *Lettering.* Lettering shall be at least 0.08 inches high, and the perimeter of the final plat shall be depicted with heavier lines (dashed) than the remaining portion of the plat.

4. *Location*. All data necessary for the location in the field of all points within the plat shall be shown. Straight lines shall be designated with bearing and distance; curves shall be designated by arc length, central angle and radius. All dimensions shall be in feet or meters, and decimals thereof to the nearest 1/100 of a foot, or 5/1,000 of a meter; except that angles shall be in degrees to the nearest second.

20.320.080 Other Provisions.

A. *Variances*. One or more variances may be requested relating to any of the design or development standards contained within VMC 20.320.070 except those for which variances are expressly prohibited, as listed in VMC 20.290.010. These shall be requested concurrently subject to the procedural requirements and approval criteria contained in VMC 20.290.040. No variances to procedural regulations are permitted.

B. *Proximity to agricultural and mineral activities*.

1. All plats or development approvals under this title issued for residential development activities within one-quarter mile of lands zoned agricultural or from existing agricultural or mineral resource operations shall be accompanied by a notice provided by the Planning Official. Said notice shall include the following disclosure:

   a. The subject property is within one-quarter mile of designated agricultural land or mineral resource land as applicable, on which a variety of commercial activities may occur that are not compatible with residential development for certain periods of limited duration. Potential discomforts or inconveniences may include, but are not limited to: noise, odors, fumes, dust, smoke, insects, operation of machinery, including aircraft, during any hour period, storage and disposal of manure, and the application by spraying or otherwise of chemical fertilizers, soil amendments, herbicides and pesticides.

b. In the case of subdivision plats, short subdivision plats or recorded binding site plans, such notice shall also be recorded separately with the Clark County auditor.

2. All plats or development approvals under this title issued for residential development activities shall provide a barrier such as fencing or vegetation between the immediately-adjacent residential lots and agricultural and mineral resource activities. A natural buffer, such as a wetland, swale or berm, may substitute for the barrier upon approval of the Planning Official. Lots with street frontage are not required to provide a barrier between residential uses and an adjacent agricultural or mineral resource activity across the street.

C. *Subdivisions of commercially and industrially zoned properties*.

1. Preliminary plats for commercial and industrial properties shall comply with all of the requirements of VMC 20.320.030 and 20.320.040.

2. Final plats for commercial and industrial properties shall comply with all of the requirements of VMC 20.320.060 except that the final plat shall be in substantial compliance with the preliminary plat if lot sizes are within the range of lots sizes proposed for the preliminary plat, if lot sizes were shown on the preliminary plat.

D. *Revisions of recorded plats*.

1. Any alteration or modification of a short subdivision or subdivision plat shall be undertaken pursuant to all applicable development standards including regulations established in Chapter 58.17 RCW by a Type II or Type III process, respectively. If approved, the subdivider shall obtain approval of a final plat application as required by this chapter.

2. *Dedicated easements – (Alternative Process)*. To extinguish or alter a dedicated easement, an alternative process to the above may be used if such process was established on the recorded plat or other document creating the dedicated easement as authorized under RCW 64.04.175.

20.320.090 Remedies and Penalties.

A. R*emedies and penalties*.

1. *Rescinding of sale and recovery of costs*. Any purchaser or transferee of property divided in violation of this chapter may rescind the sale or transfer and recover costs of investigation, suit and reasonable attorney's fee occasioned thereby, or otherwise recover any damage resulting thereby from the person or agent who illegally subdivided or short subdivided the land.

2. *Injunctive*.

    a. Whenever any parcel of land is divided into two or more divisions, lots, tracts or parcels of land, and any person, firm or corporation or any agent of any of them sells or transfers any such division, lot, tract or parcel without either having a final plat or short plat filed and recorded as required in this chapter, the city attorney shall commence an action to restrain and enjoin further divisions or sales, or transfers, and compel compliance with all provisions of this chapter. The costs of such action shall be taxed against the person, firm, corporation or agent selling or transferring the property.

    b. In the enforcement of this chapter, the city attorney may accept an assurance of discontinuance of any act or practice deemed in violation of this chapter from any person engaging in or who has engaged in such act or practice. Any such assurance shall be in writing and be filed with and subject to, the approval of the superior court of Clark County. The violation of such assurance shall constitute prima facie proof of violation of this title.

3. *Penalty for violation*. No land comprising any part of a proposed subdivision or short subdivision to be established henceforth in the city shall be sold or leased until such subdivision or short subdivision has been approved as provided by this chapter, and a plat or short plat, as appropriate, has been filed and recorded. In addition, any person, being the owner or agent of the owner of such land, or who acts in any capacity in effectuating a sale or lease, who sells or leases any division, lot, tract or portion thereof shall be guilty of a misdemeanor and upon conviction thereof shall be punished by a fine in any sum not to exceed $1,000. Each sale or lease shall constitute a separate and distinct offense for each separate land division, lot, tract or portion of said land.

20.320.100 Unit Lot Subdivision.

A. *Purpose.* The purpose of these provisions is to allow for the more flexible creation of lots of varying sizes and types, while applying only those site development standards applicable to the parent site, rather than to the individual lots resulting from the subdivision.

B. *Applicability*.

1. A unit lot subdivision creates a relationship between the parent site and each lot created, referred to as a “unit” lot.

2. The Unit Lot Subdivision can only create a maximum of nine unit lots.

3. Unit Lot Subdivisions are allowed for all residential development on parent sites in zones that allow residential development. Subdivisions with a commercial or other non-residential must be approved through another platting action under VMC 20.320.

4. Each dwelling unit must have separate front or rear exterior access to the ground floor.

C. *Application Procedure*. Unit Lot Subdivisions shall be processed as a short plat and shall meet the requirements of this chapter unless otherwise noted by this section.

D. *General Requirements*.

1. The parent site shall meet all applicable development standards of the underlying base zoning district.
2. So long as the parent site meets all applicable development standards, each unit lot may deviate from the development standards of the underlying base district.
3. The parent site shall be subject to frontage improvements while the unit lots would not be subject to these requirements.
4. All buildings shall meet all applicable provisions of the building and fire code.
5. Lots created through a Unit Lot Subdivision shall be subject to all applicable requirements of Title 20, except as otherwise modified by this section.
6. Each unit lot's area and width for purposes of subdivision may be as small as the footprint of the building situated upon it, subject to the requirements of the building and fire code.
7. Portions of the parent site designated for common use shall be identified as Tracts or other common space and owned in common by the owners of the unit lots or a larger collective organization. This requirement shall be noted on the plat as required in subsection (E) of this section.
8. The parent site and each unit lot shall make adequate provisions for ingress, egress, and utility access to and from each lot created by reserving such common areas or other easements over and across the parent site as deemed necessary to comply with all other design and development standards generally applicable to the underlying site development plan.
9. The parent site shall have direct vehicular access to a public street.

E. *Required Plat Notes*. Notes shall be placed on the plat recorded with the Clark County Recorder's Office to state the following:

1. The title of the plat shall include the phrase "Unit Lot Subdivision."
2. The individual unit lots are not separate buildable sites. Additional development of the individual unit lots may be limited due to the application of development standards to the parent lot.
3. Approval of the design and layout of the development was granted by the review of the development on the parent lot.
4. Subsequent platting actions, additions, or modifications to any buildings may not create a nonconformity of the parent lot.

5. Access easements, joint use and maintenance agreements, and covenants, conditions, and restrictions identifying the rights and responsibilities of property owners and/or the homeowners association for use and maintenance of common garage, parking and vehicle access areas; on-site recreation; landscaping; utilities; common open space; exterior building facades and roofs; and other similar features.

20.320.110 Administrative Lot Split.

A. *Purpose*. The purpose of these provisions is to allow an existing residential lot to be split to create a new residential lot.

B. *Applicability*. The lot split is allowed in the Low-Scale and Medium-Scale District.

C. The Administrative Lot Split can only create one additional lot.

D. If a lot split results in a lot of a size that could be further subdivided, the lot is ineligible for an administrative lot split.

E. Application Procedure. Administrative Lot Split shall be processed as a Type I process and shall meet the requirements of this chapter unless otherwise noted by this section.

F. *General Requirements*.

1. All buildings shall meet all applicable provisions of the building and fire code.
2. Lots created through an Administrative Lot Split shall be subject to all applicable requirements of Title 20, except as otherwise modified by this section.
3. The newly created lot must meet minimum density requirements.
4. The newly created lot shall not be subject to frontage requirements or maximum lot sizes.
5. If the lot split would require demolition or alteration of any existing housing that would displace a renter, the applicant must recommend a displacement mitigation strategy that may include, but is not limited to, relocation assistance.
6. Access and utility easements for the benefit of the newly created lot must be recorded on or before recording of the lot split survey.
7. Required Survey Notes. Notes shall be placed on the survey recorded with the Clark County Recorder's Office to state the following:
    a. The title of the survey shall include the phrase "Administrative Lot Split."
    b. No future lot splits allowed of the parent lot and newly created lot.
8. The parent lot was not created through the splitting of a residential lot authorized by this section.

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CHAPTER 20.330
BINDING SITE PLANS

Sections:

20.330.010 Purpose.

20.330.020 Approval Process.

20.330.030 Application Submission Requirements.

20.330.040 Certification of Site Plan Compliance.

20.330.050 Vacation or Alteration of Approved Binding Site Plan.

20.330.010 Purpose.

The purpose of the binding site plan process is to provide an alternative to the standard subdivision process for specific types of development. The binding site plan shall only be applied for the purpose of dividing land for:

A. Sale or for lease of commercially or industrially zoned property as provided in RCW 58.17.040(4);

B. A division for the purpose of lease as provided in applicable RCW sections when no other structure other than manufactured homes or travel trailers are permitted to be placed upon the land; provided, that the land use is in accordance with the requirements of this title; and

C. Condominiums as provided in applicable RCW sections consistent with RCW 58.17.040(7).

20.330.020 Approval Process.

A. *Approval process.* An application for a binding site plan review shall be processed by means of a Type II procedure pursuant to Section 20.210.050 using approval criteria in Section (B) below.

B. *Conditions of approval.* Planning Official shall have the authority to review and approve, deny or approve with conditions a proposed binding site plans for the purposes of land division as described in Section 20.330.010 VMC. To approve a binding site plan application, the Planning Official must determine that the binding site plan is in accordance with the following:

1. Applicable requirements of this title;

2. Technical standards contained in Section 20.320.070; and

3. Required mitigation measures imposed as a part of the SEPA review process.

20.330.030 Application Submission Requirements.

A. *Submission requirements – New developments.* Whenever an applicant desires to create legal lots by means of a binding site plan pursuant to this chapter in conjunction with a new development, the applicant shall be subject to the site plan review procedures of Chapter 20.280 VMC. In such event and in addition to all of the submission requirements for site plan review, the applicant shall clearly indicate on all of the plans required for site plan review the proposed lots to be created and how their size, dimensions and other features comply with the requirements of this title.

B. *Submission requirements – Existing developments.* In cases where an applicant desires to create legal lots by means of a binding site plan pursuant to this chapter in conjunction with an existing development or when no development is proposed, the applicant shall provide the following information in the application:

1. The binding site plan name, which must be other than the name of an existing subdivision, short subdivision or binding site plan addition or plat;
2. Name, mailing address, and telephone number of the owner and/or developer;
3. Name, mailing address, telephone number, and signature of person preparing the application;
4. Date;
5. Location, including ¼ section, township, range and, as applicable, donation land claim and/or subdivision;
6. Number of acres;
7. Comprehensive Plan and zoning designations;
8. Existing and proposed land uses;
9. Number and size of all lots;
10. Names of all utility purveyors;
11. Signatures of all property owners; and
12. Fee as governed by Chapter 20.190 VMC.

C. *Preliminary plat information.* The applicant shall provide the following information:

1. *Existing conditions plan.* The following information shall be provided on one or more to-scale drawings:
    a. A vicinity map showing streets and access points, pedestrian and bicycle pathways, transit stops and utility locations within a given radius of the site;
    b. The site size, dimensions and orientation relative north;

c. The location, name and dimensions of public and private streets adjoining the site;

d. The location of existing structures and other improvements on the site, including structures, driveways, parking, loading, pedestrian and bicycle paths, passive or active recreational facilities or open space and utilities;

e. Elevation of the site at two-foot contour intervals for grades zero to 10 percent and at five-foot contour intervals for grades more than 10 percent;

f. The approximate location of significant natural conditions as available from the city's and/or county's GIS system such as:

i. The 100-year flood plain;

ii. The location of drainage patterns and drainage courses;

iii. Unstable ground (lands subject to slumping, slides or movement);

iv. High seasonal water table or impermeable soils;

v. Areas having severe soil erosion potential;

vi. Areas having severe weak foundation soils;

vii. Significant wildlife habitat or vegetation;

viii. Slopes in excess of 15 percent;

ix. Significant historic, cultural or archaeological resources, rock outcroppings;

x. Location, dimensions, and purpose of existing easements.

2. *Preliminary Binding Site Plan.* The proposed preliminary binding site plan shall include the following information presented on one or more drawings:

a. The proposed site and its dimensions and area.

b. Proposed lots, tracts and easements including dimensions and total acreage.

c. Abutting properties or, if abutting properties extend more than 100 feet from the site, the portion of abutting properties within about 100 feet of the site, and the approximate location of structures and uses on abutting property or portion of the abutting property.

d. The location and dimensions of development if proposed, including the following:

i. Streets and other rights-of-way and public or private access easements on and adjoining the site;

ii. All parking and circulation areas;

iii. Loading and service areas;

iv. Active or passive recreational or open space features;

v. All utilities;

vi. Existing structures to be retained on the site and their distance from property lines;

vii. Proposed structures on the site, including signs, fences, etc., and their distance from property lines if known at time of land division; and

viii. The location and type of proposed outdoor lighting and existing lighting to be retained if known at time of land division;

ix. Location, dimensions, and purpose of existing easements.

3. *Narrative.* A preliminary plat application shall include the following:

   a. A comprehensive narrative addressing how the development complies with the technical standards in VMC 20.320.070; other applicable standards of this Title 20 and the applicable plan policies of the Comprehensive Plan outlined by staff as being applicable to the proposed development;

   b. Description of the uses proposed for the site;

   c. Phasing plan, if applicable;

   d. Construction schedule;

   e. Any variances requested pursuant to the regulations in Chapter 20.280 VMC;

   f. Existing covenants or restrictions and easements, if applicable; and

   g. History of any previous subdivisions and short subdivisions of the property.

4. *Supplementary information.* The following supplemental information shall also be submitted unless otherwise indicated in parenthesis:

   a. Environmental checklist that complies with Chapter 20.740 VMC, SEPA Regulations, if applicable;

   b. Geotechnical/soils survey, if applicable;

   c. Tree plan that complies with the requirements of Chapter 20.450.045 Landscaping and Tree Conservation, if applicable;

   d. Preliminary stormwater and erosion control plans as governed by Chapter 14.25 VMC, Stormwater Control, and Chapter 14.24 VMC, Erosion Control, if applicable;

e. Landscape plan, if known at the time of land division, that complies with the requirements of Section 20.450.035 VMC, Landscaping and Tree Conservation. If applicable, the landscape plan shall be drawn at the same scale as the existing conditions plan, or a larger scale if necessary. Where proposed development affects only a portion of a site, the landscape plan need show only the areas where existing soil contours and vegetation will be disturbed by the construction or use, or other areas where landscaping is required. Note: many aspects of this plan, including street trees, may already be incorporated into the Tree Plan;

f. Archaeological Pre-Determination Report, if applicable, that complies with the requirements of Chapter 20.710 VMC, Archaeological Resource Protection (two copies);

g. Clark County Public Health Development Review Evaluation Form;

h. *Certified mailing list.* Current Clark County assessor map(s) showing the property(ies) within a 300-foot radius of the site, per the requirements in Chapter 20.210 VMC, Decision Making Procedures, and one set of stamped and addressed envelopes and one set of mailing labels with the names and addresses of owners of all properties within a 300-foot radius certified as accurate and complete by the Clark County assessor or a title company. For non-owner-occupied properties, provide one set of stamped and addressed envelopes and one set of mailing labels addressed to "occupant" as can be determined from available County assessor records.

20.330.040 Certification of Site Plan Compliance.

A. *Certification process.* Prior to recording any binding site plan approved under the provisions of Section 20.330.030 VMC shall be certified to comply with the requirements of this chapter by the Planning Official. Certification shall consist of the signature of the Planning Official and recording with the Clark County auditor's office with a record of survey. The survey document shall include all required notes pertaining to development of the properties and a statement legally binding all current and future owners to comply with the conditions of approval. These may be provided as separate documents.

B. *Revocation of certification.* Certification may not be revoked unless the Planning Official finds that the plan, use or development project would violate the requirements of Vancouver Municipal Code or the Revised Code of Washington.

C. *Criteria for creation of lots, parcels or tracts.* Lots, parcels or tracts created through the binding site plan process shall be considered legal lots of record. The number of lots, tracts, parcels, sites or divisions shall not exceed the maximum number allowed by this title.

D. *Legally responsible party.* All provisions, conditions and requirements of the binding site plan shall be legally enforceable on the purchaser or any other person acquiring a lease or other ownership interest of any lot, parcel, or tract created pursuant to the binding site plan.

20.330.050 Vacation or Alteration of Approved Binding Site Plan.

A. *Alteration or vacation.* A binding site plan may be altered or vacated if requested, in writing, by all owners of the properties directly affected. An application shall be submitted on a form prescribed by the Planning Official. In the instance of a revision the applicant shall submit all of the materials required for preliminary binding site plan review. In the instance of a vacation the burden of proof for justifying the vacation of the binding site plan shall be on the applicant. The applicant must prove that no property, either within the boundaries of the property to which the binding site plan is applied or adjacent property, will be adversely impacted; the vacation will not have an adverse impact on the provision of utilities in the area; no open spaces or recreational facilities will be adversely affected by the vacation.

B. *Procedure for alteration or vacation.* The decision on an alteration or vacation of a binding site plan shall be required to go through the same procedures as an original application, including notification and preparation of staff reports. The appeal procedures for binding site plan approval shall also be applicable to a requested alteration or vacation.

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20.400
USES AND DEVELOPMENT STANDARDS

Sections:

20.410 Zoning Districts

20.420 Building Types

20.430 Use Requirements

20.440 Frontage Types

20.450 Additional Development Standards

CHAPTER 20.410
ZONING DISTRICTS

Sections:

20.410.010 Purpose.
20.410.020 Applicability.
20.410.030 Establishment of Zoning Districts.
20.410.040 Base Density.
20.410.050 Low-Scale Neighborhood.
20.410.060 Medium-Scale Neighborhood.
20.410.070 Mixed-Use Neighborhood.
20.410.080 Regional Activity Center.
20.410.090 Institutional / Campus.
20.410.100 Industrial / Employment.
20.410.110 Heavy Industrial.
20.410.120 Manufactured Home Development.
20.410.130 Parks / Open Space.
20.410.140 Natural Areas.
20.410.150 Lot Buffers.
20.410.160 Encroachments.

20.410.010 Purpose.

A. The purpose of this chapter is to introduce ten (10) city-wide zoning districts, each with baseline zoning requirements applicable to every parcel of property (lot). The zoning districts are aligned with the place-type goals outlined in the future land use plan and include requirements for base densities, height maximums, uses, and allowable building types.

20.410.020 Applicability.

A. This chapter shall be applicable to all permit applications on any lot or lots. Building types and primary use types associated with any permit shall also be subject to Chapter 20.280 VMC Site Plan Review, and as applicable per requirements for the primary use type or types per Chapter 20.430 VMC Use Requirements.

20.410.030 Establishment of Zoning Districts.

A. The zoning districts include the following:

1. Low-Scale Neighborhood District (LS).
2. Medium-Scale Neighborhood District (MS).
3. Mixed-Use Neighborhood District (MX).
4. Regional Activity Center (RA).
5. Institutional/Campus District (IC).
6. Industrial/Employment District (IE).
7. Heavy Industrial District (HI).
8. Manufactured Home Development District (MH).
9. Parks and Open Space District (PO).
10. Natural Areas District (NA).

20.410.040 Base Density.

Calculation of base density and exemptions to this requirement for zoning districts shall be subject to the provisions of Chapter 20.180 VMC Density Requirements.

20.410.050 Low-Scale Neighborhood.

IMAGE 20.410.050. LOW-SCALE NEIGHBORHOOD CHARACTER IMAGE



Image is advisory only

A. *Purpose and Character.* The Low-Scale Neighborhood District (LS) is designed to foster a community characterized by lower intensity and scaled housing that includes diverse middle housing options. This includes a range of housing types such as single-family homes, townhouses, rowhouses, duplexes, triplexes, fourplexes, fiveplexes, six-plexes, stacked flats, and cottage court housing. The LS district also encourages smaller-scale commercial activities at corner nodes to enhance neighborhood life, such as cafés, salons, professional services, and restaurants.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. Eight (8) Units per Acre.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. Three (3) floors above the adjacent grade and forty-five (45') feet.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.050 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.050. ALLOWABLE BUILDING TYPES WITHIN THE LOW-SCALE NEIGHBORHOOD DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	Yes
Townhouse/Rowhouse Building (TRB)	Yes
Stacked Multi-Plex Building (SMB)	Yes
Flex-Plex Building (FPB)	Yes
Cottage Court Building (CCB)	Yes
Multifamily Building (MFB)	No
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	Yes
Mixed-Use Office Building (MOB)	No
Commercial Block Building (CBB)	Yes
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	No
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	No
Civic/Institutional Building (CIB)	Yes

F. *Use Requirements*. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.060 Medium-Scale Neighborhood.

IMAGE 20.410.060. MEDIUM-SCALE NEIGHBORHOOD CHARACTER IMAGES





Images are advisory only

A. *Purpose and Character.* The Medium-Scale Neighborhood District (MS) is designed to foster a vibrant community with medium-intensity housing and a variety of housing options. This includes housing types such as courtyard buildings, apartment buildings, and multifamily buildings, complementing those found in LS. The MS district also supports commercial activities that enhance neighborhood vitality and creates main streets, such as cafés, restaurants, small offices, retail shops, and other local businesses.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.
4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. Sixteen (16) Units per Acre.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. Seventy-five (75') feet.
3. Maximum Buffer Height. See Table 20.410.060.-1.

E. Building types.

1. Table 20.410.060 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.060. ALLOWABLE BUILDING TYPES WITHIN THE MEDIUM-SCALE NEIGHBORHOOD DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	Yes
Townhouse/Rowhouse Building (TRB)	Yes
Stacked Multi-Plex Building (SMB)	Yes
Flex-Plex Building (FPB)	Yes
Cottage Court Building (CCB)	Yes
Multifamily Building (MFB)	Yes
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	Yes
Mixed-Use Office Building (MOB)	Yes
Commercial Block Building (CBB)	Yes
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	No
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	No
Civic/Institutional Building (CIB)	Yes

F. *Use Requirements*. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.070 Mixed-Use Neighborhood

IMAGE 20.410.070. MIXED-USE NEIGHBORHOOD CHARACTER IMAGE



Image is advisory only

A. *Purpose and Character.* The Medium-Scale Neighborhood District (MS) is designed to foster a vibrant community with medium-intensity housing and a variety of housing options. This includes housing types such as courtyard buildings, apartment buildings, and multifamily buildings, complementing those found in LS. The MS district also supports commercial activities that enhance neighborhood vitality and creates main streets, such as cafés, restaurants, small offices, retail shops, and other local businesses.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. Thirty-two (32) Units per Acre.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. One hundred and ten (110') feet.
3. Maximum Buffer Height. See Table 20.410.050.

E. Building types.

1. Table 20.410.070 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.070. ALLOWABLE BUILDING TYPES WITHIN THE MIXED-USE NEIGHBORHOOD DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	Yes
Stacked Multi-Plex Building (SMB)	Yes
Flex-Plex Building (FPB)	Yes
Cottage Court Building (CCB)	Yes
Multifamily Building (MFB)	Yes
Mid-Rise Residential Building (MIB)	Yes
Mixed-Use Residential Building (MXB)	Yes
Mixed-Use Office Building (MOB)	Yes
Commercial Block Building (CBB)	Yes
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	Yes
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	Yes
Civic/Institutional Building (CIB)	Yes

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.080 Regional Activity Center

IMAGE 20.410.080. REGIONAL ACTIVITY CENTER CHARACTER IMAGE



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A. *Purpose and Character.* The Regional Activity Center District (RA) is designed to foster economic growth, provide diverse entertainment and civic opportunities, and address housing needs. This district encourages the development of compact, mixed-use areas with integrated open spaces that seamlessly connect the city's core to surrounding neighborhoods through walkable corridors and frequent transit access. Housing options in the RA include mid-rise residential buildings, mixed-use developments, podium buildings, and multifamily structures of various scales. The district also supports a wide range of commercial activities and complementary uses that enhance its vibrancy and diversity, such as mixed-use offices, structured parking, and civic or institutional buildings.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. Sixty-four (64) Units per Acre.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. No maximum.
3. Maximum Buffer Height. See Table 20.410.050.

E. Building types.

1. Table 20.410.080 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.080. ALLOWABLE BUILDING TYPES WITHIN THE REGIONAL ACTIVITY CENTER DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	No
Stacked Multi-Plex Building (SMB)	No
Flex-Plex Building (FPB)	No
Cottage Court Building (CCB)	No
Multifamily Building (MFB)	Yes
Mid-Rise Residential Building (MIB)	Yes
Mixed-Use Residential Building (MXB)	Yes
Mixed-Use Office Building (MOB)	Yes
Commercial Block Building (CBB)	Yes
Big Box Retail Building (BRB)	Yes
Flexible-Use Building (FUB)	Yes
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	Yes
Civic/Institutional Building (CIB)	Yes

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.090 Institutional/Campus

IMAGE 20.410.090. INSTITUTIONAL/CAMPUS CHARACTER IMAGE



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A. *Purpose and Character.* The Institutional/Campus District (IC) is designed to foster areas that will support employment through academic, civic, and medical institutions and provide housing options that blend with the district character. These may also include uses such as athletic facilities, event spaces, equipment, and other accessory uses that are needed to support the city's valuable institutions and enhance economic development. Housing options in the IC district include rowhouses, rowhouses, multifamily buildings, and mid-rise buildings intended to encourage more walking and biking to work.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.
4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. No minimum.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. No Maximum.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.090 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.090. ALLOWABLE BUILDING TYPES WITHIN THE INSTITUTIONAL/CAMPUS DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	Yes
Stacked Multi-Plex Building (SMB)	Yes
Flex-Plex Building (FPB)	Yes
Cottage Court Building (CCB)	No
Multifamily Building (MFB)	Yes
Mid-Rise Residential Building (MIB)	Yes
Mixed-Use Residential Building (MXB)	Yes
Mixed-Use Office Building (MOB)	Yes
Commercial Block Building (CBB)	Yes
Big Box Retail Building (BRB)	Yes
Flexible-Use Building (FUB)	Yes
Industrial/Distribution Building (IDB)	Yes
Structured Parking Garage Building (SPB)	Yes
Civic/Institutional Building (CIB)	Yes

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.100 Industrial/Employment

IMAGE 20.410.100. INDUSTRIAL/EMPLOYMENT CHARACTER IMAGE



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A. *Purpose and Character.* The Industrial/Employment District (IE) is designed to foster a mix of larger-scale industrial facilities, warehousing, and flexible-use spaces alongside smaller multi-tenant industrial and office uses. Clustered to promote economic development and synergy between business and industries, the IE district also includes parks and open spaces that buffer industrial areas and connections to adjacent residential areas to encourage more walking and biking to work.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.
4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. No minimum.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. One hundred and fifty (150') feet.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.100 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.100. ALLOWABLE BUILDING TYPES WITHIN THE INDUSTRIAL/EMPLOYMENT DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	No
Stacked Multi-Plex Building (SMB)	No
Flex-Plex Building (FPB)	No
Cottage Court Building (CCB)	No
Multifamily Building (MFB)	No
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	No
Mixed-Use Office Building (MOB)	Yes
Commercial Block Building (CBB)	Yes
Big Box Retail Building (BRB)	Yes
Flexible-Use Building (FUB)	Yes
Industrial/Distribution Building (IDB)	Yes
Structured Parking Garage Building (SPB)	Yes
Civic/Institutional Building (CIB)	Yes

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.110 Heavy Industrial

IMAGE 20.410.110. HEAVY INDUSTRIAL CHARACTER IMAGE



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A. *Purpose and Character.* The Heavy Industrial District (HI) is designed to foster large-scale industrial activities, such as manufacturing, processing, and distribution, while integrating principles of walkability and bikability to enhance functionality and aesthetics. The HI district emphasizes efficient land use, incorporating landscaped buffers, shared pathways, and well-planned building orientation to minimize conflicts between industrial operations and pedestrian-friendly environments that traverse the area.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. No minimum.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. No maximum.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.110 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.110. ALLOWABLE BUILDING TYPES WITHIN THE HEAVY INDUSTRIAL DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	No
Stacked Multi-Plex Building (SMB)	No
Flex-Plex Building (FPB)	No
Cottage Court Building (CCB)	No
Multifamily Building (MFB)	No
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	No
Mixed-Use Office Building (MOB)	No
Commercial Block Building (CBB)	No
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	Yes
Industrial/Distribution Building (IDB)	Yes
Structured Parking Garage Building (SPB)	Yes
Civic/Institutional Building (CIB)	No

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.120 Manufactured Home Development

IMAGE 20.410.120. MANUFACTURED HOME DEVELOPMENT CHARACTER IMAGE



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A. *Purpose and Character.* The Manufactured Home Development District (MH) is intended to preserve existing manufactured home developments, protect long-term affordability, and prevent the displacement of existing residents. The district promotes community stability by limiting redevelopment of manufactured home developments while allowing the continued repair, replacement, and expansion of manufactured housing in accordance with the standards of this title.

   Manufactured homes and modular homes, as defined in this code, are not limited to the MH zoning district and are permitted wherever residential uses are allowed, provided they comply with the development standards applicable to the underlying zoning district and building type.

B. Additional Requirements.

   1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
   2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
   3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.
   4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

   1. Minimum Density. No minimum.

2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. Forty-five (45') feet.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.120 provides a list of allowable building types within the district, provided they are permanently affordable at or below sixty (60%) percent Area Median Income (AMI). See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.120. ALLOWABLE BUILDING TYPES WITHIN THE MANUFACTURED HOME DEVELOPMENT DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable (Only at or below permanent 60% AMI)
Single-Family Residential Building (SFB)	Yes
Townhouse/Rowhouse Building (TRB)	Yes
Stacked Multi-Plex Building (SMB)	Yes
Flex-Plex Building (FPB)	Yes
Cottage Court Building (CCB)	Yes
Multifamily Building (MFB)	No
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	No
Mixed-Use Office Building (MOB)	No
Commercial Block Building (CBB)	No
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	No
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	No
Civic/Institutional Building (CIB)	No

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.130 Parks/Open Space

IMAGE 20.410.130. PARKS/OPEN SPACE CHARACTER IMAGE



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A. *Purpose and Character.* The purpose of the Parks/Open Space District (PO) is designed to provide a range of open spaces that support the community in a variety of ways. Neighborhood parks support local recreation, active lifestyles, and community engagement, while community parks offer larger amenities like sports fields, skate parks, trails, and public art. Regional parks provide diverse recreation with trails, sports facilities, and natural features, while civic plazas, linear parks, and special-use facilities cater to dense urban areas and specialized activities and user groups.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. No minimum.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. Forty-five (45’) feet.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.130 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

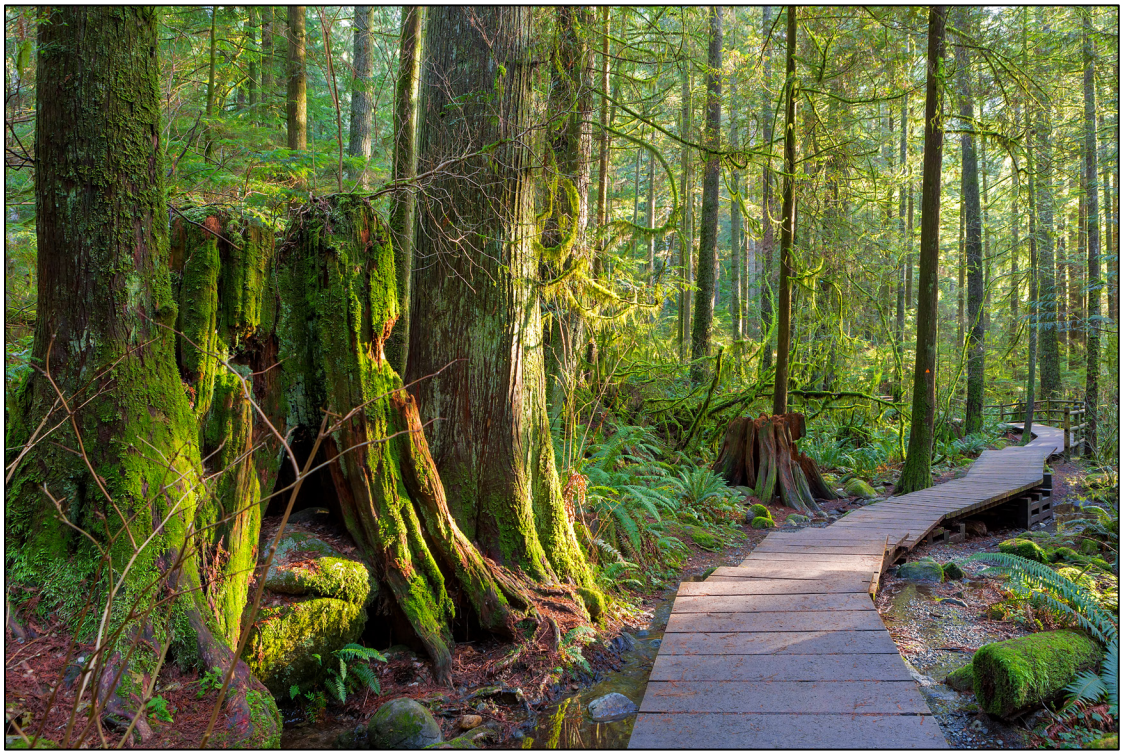
TABLE 20.410.130. ALLOWABLE BUILDING TYPES WITHIN THE PARKS/OPEN SPACE DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	No
Stacked Multi-Plex Building (SMB)	No
Flex-Plex Building (FPB)	No
Cottage Court Building (CCB)	No
Multifamily Building (MFB)	No
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	No
Mixed-Use Office Building (MOB)	No
Commercial Block Building (CBB)	No
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	No
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	No
Civic/Institutional Building (CIB)	Yes

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

20.410.140 Natural Areas

IMAGE 20.410.140. NATURAL AREAS CHARACTER IMAGE



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A. *Purpose and Character.* The purpose of the Natural Areas District (NA) is designed to establish primarily undeveloped lands managed for ecological value and light-impact recreation. Ranging from small urban sites to vast regional landscapes, they support activities like bird-watching, environmental education, walking, running, biking, and hiking. The NA District is intended to offer relief from urban density while preserving sensitive ecosystems such as wetlands, floodplains, riparian zones, mature woodlands, wildlife habitats, scenic viewpoints, wooded ridgelines, and prairie meadows.

B. Additional Requirements.

1. See Chapter 20.450 VMC Additional Development Standards of this code for other requirements that may apply to this district.
2. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.
3. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

4. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

C. Base Density.

1. Minimum Density. No minimum.
2. Maximum Density. No maximum.

D. Height range.

1. Minimum Height. No minimum.
2. Maximum Height. Forty-five (45’) feet.
3. Maximum Buffer Height. See Table 20.410.150.

E. Building types.

1. Table 20.410.140 provides a list of allowable building types within the district. See Chapter 20.420 VMC Building Types of this code for building type requirements.

TABLE 20.410.140. ALLOWABLE BUILDING TYPES WITHIN THE NATURAL AREAS DISTRICT

Building Types (See Chapter 20.420 VMC)	Allowable
Single-Family Residential Building (SFB)	No
Townhouse/Rowhouse Building (TRB)	No
Stacked Multi-Plex Building (SMB)	No
Flex-Plex Building (FPB)	No
Cottage Court Building (CCB)	No
Multifamily Building (MFB)	No
Mid-Rise Residential Building (MIB)	No
Mixed-Use Residential Building (MXB)	No
Mixed-Use Office Building (MOB)	No
Commercial Block Building (CBB)	No
Big Box Retail Building (BRB)	No
Flexible-Use Building (FUB)	No
Industrial/Distribution Building (IDB)	No
Structured Parking Garage Building (SPB)	No
Civic/Institutional Building (CIB)	No

F. Use Requirements. See Chapter 20.430 VMC Use Requirements of this code for individual use permit requirements.

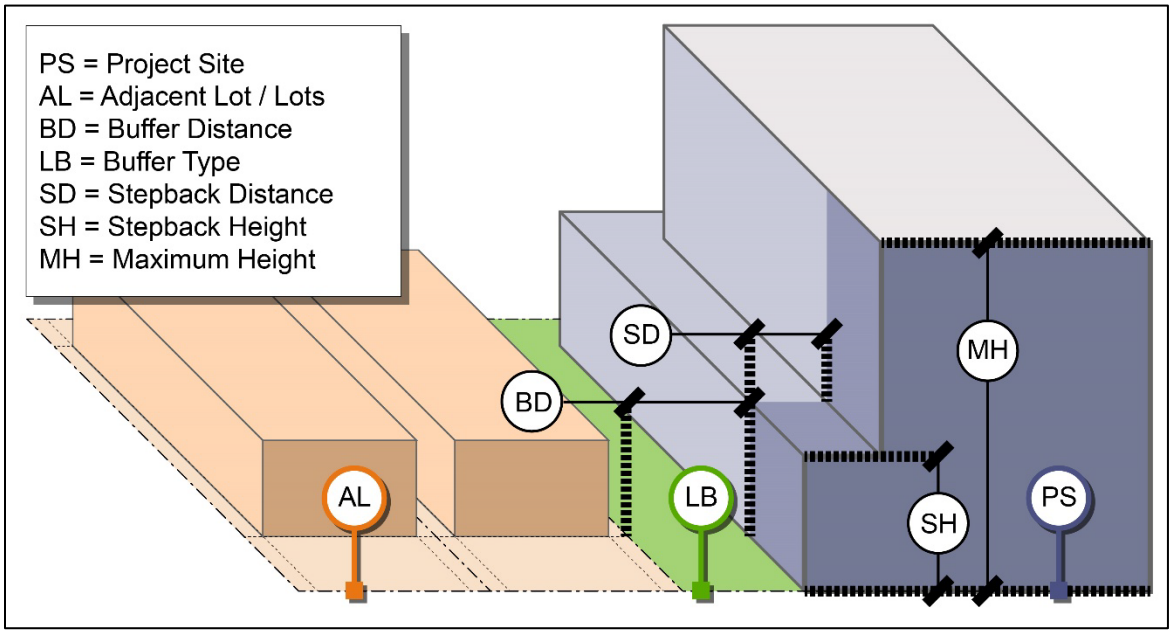
20.410.150 Lot Buffers

A. *Purpose*. The purpose of buffers is to balance new development in more intense districts with existing development and lower-intensity districts in terms of heights and build out. These lot buffers are applicable to the side and rear property lines (and associated setbacks) for any lot or lots which utilizes a building type as part of this Chapter of the code.

B. *Landscape Requirements*. All development subject to this Chapter must also meet Chapter VMC Landscaping - Table 20.450.006.030-1 Landscaping and Screening Design Standards for site buffer details L1-L5 for the Lot Buffer (LB) identified for the lot in this section.

C. *Overview of Lot Buffers*. Figure 20.410.060-1 provides a brief overview of how lot buffers are intended to work for the development along with an associated way to measure and account for the buffer, stepback height limitations, and stepback distance associated. This diagram is purely an example for illustrative purposes.

FIGURE 20.450.150. LOT BUFFER DIAGRAM



D. Lot Buffers by Base District

Table 20.410.150 provides a guide to lot buffers for all new development based on the zoning district of the project site (PS) or sites and the adjacent lot or lots (AL). Maximum height is always regulated by the zoning district established in Chapter 20.410 VMC Zoning District. Lot buffers indicating “none” are not applicable and must only meet the building placement and buildout requirements for the associated building type or types in Chapter 20.420 VMC Building Types. The following lot buffers are applicable:

TABLE 20.410.150. LOT BUFFERS AND ADJACENT LOTS

Project Site or Sites (PS)	Adjacent Lot or Lots (AL)									
	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA
LS	None.							LB=L1	None.	
MS	LB=L2	None.						BU=10’ SH=35’ SD=20’ LB=L3	None.	
MX	BD=15’ SH=45’ SD=20’ LB=L3	BD=10’ SH=75’ SD=15’ LB=L2	None.					BU=10’ SH=35’ SD=20’ LB=L4	None.	
RA	BD=25’ SH=55’ SD=30’ LB=L4	BD=15’ SH=75’ SD=20’ LB=L3	None.						None.	
IC			None.						None.	
IE	BD=35’ SH=45’ SD=40’ LB=L5	BD=20’ SH=75’ SD=30’ LB=L4	BD=15’ SH=75’ SD=20’ LB=L3	None.				BD=25’ SH=35’ SD=30’ LB=L3	None.	
HI	BD=45’ SH=45’ SD=50’ LB=L5		BD=35’ SH=75’ SD=50’ LB=L4	None.					None.	
MH	None.									
PO	None.									
NA	None.									

20.410.160 Encroachments

Any building type that is located along a primary street within the Regional Activity Center (RA) zoning district may extend into the public right-of-way as follows:

A. Must obtain a right-of-way permit and meet the standards contained in this section.

B. Encroachments are only allowed on the following building types (per Chapter VMC 20.420 Building Types):

   1. Multifamily Building Type (MFB).

   2. Mid-Rise Residential Building Type (MIB).

   3. Mixed-Use Residential Building Type (MXB).

   4. Mixed-Use Office Building Type (MOB).

C. Minimum clear height over any sidewalk shall be twelve (12’) feet.

D. Maximum overall height of the projection shall be eighty-five (85’) feet above any sidewalk, except for balconies, bay windows and structured parking. Projections may be permitted only for extensions of five (5’) feet or less into the right-of-way where any supporting ground level columns are located entirely outside the right-of-way.

E. Maximum projection from the property line into the right-of-way shall be five (5’) feet where no curb exists, or to a point no closer than two (2’) feet to the face of an existing curb.

F. In the event of a conflict between these standards and any Frontage Type Requirements (per Chapter VMC 20.440 Frontage Type Requirements), the planning official may determine which requirement applies.

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20.420
BUILDING TYPES

Sections:

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20.420.030	Establishment of Building Types
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20.420.200	Structured Parking Garage Building Type (SPB)
20.420.210	Civic / Institutional Building Type (CIB)

20.420.010 Purpose

This chapter introduces fifteen (15) building types that support the implementation of the code by enabling a fine-grained mix of structures tailored to each zoning district's character and scale. Each type is regulated by standards for lot size, setbacks, frontage, massing, and articulation. These standards ensure new development aligns with the intended character, complements the surrounding context, and contributes to a cohesive, walkable, and vibrant built environment that reinforces a strong sense of place.

20.420.020 Applicability

This chapter shall be applicable to all permit applications for new construction or major renovations on any lot or lots. Building types included in this chapter are subject to Chapter 20.280 VMC Site Plan Review, and as applicable per standards or submittal requirements for the primary use type or types associated with the building type per Chapter 20.430 VMC Use Requirements.

20.420.030 Establishment of Building Types

A. The building types include the following:

1. Single Family Residential Building Type (SFB).
2. Townhouse/Rowhouse Building Type (TRB).
3. Stacked Multi-Plex Building Type (SMB).
4. Flex-Plex Building Type (FPB).
5. Cottage Court Building Type (CCB).
6. Multifamily Building Type (MFB).
7. Mid-Rise Residential Building Type (MIB).
8. Mixed-Use Residential Building Type (MXB).
9. Mixed-Use Office Building Type (MOB).
10. Commercial Block Building Type (CBB).
11. Big Box Retail Building Type (BRB).
12. Flexible Use Building Type (FUB).
13. Industrial/Distribution Building Type (IDB).
14. Structured Parking Garage Building Type (SPB).
15. Civic/Institutional Building Type (CIB).

20.420.040 Allowable Building Types per Zoning District

Table 20.420.040-1 below outlines the allowable building types for each zoning district.

TABLE 20.420.040-1. ALLOWABLE BUILDING TYPES PER ZONING DISTRICT

Building Type	ABV.	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA
Single-Family Residential Building	SFB	Yes	Yes	No	No	No	No	No	Yes[1]	No	No
Townhouse/Rowhouse Building	TRB	Yes	Yes	Yes	No	Yes	No	No	Yes[1]	No	No
Stacked Multi-Plex Building	SMB	Yes	Yes	Yes	No	Yes	No	No	Yes[1]	No	No
Flex-Plex Building	FPB	Yes	Yes	Yes	No	Yes	No	No	Yes[1]	No	No
Cottage Court Building	CCB	Yes	Yes	Yes	No	No	No	No	Yes[1]	No	No
Multifamily Building	MFB	No	Yes	Yes	Yes	Yes	No	No	No	No	No
Mid-Rise Residential Building	MIB	No	No	Yes	Yes	Yes	No	No	No	No	No
Mixed-Use Residential Building	MXB	Yes	Yes	Yes	Yes	Yes	No	No	No	No	No
Mixed-Use Office Building	MOB	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No
Commercial Block Building	CBB	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No
Big Box Retail Building	BRB	No	No	No	Yes	Yes	Yes	No	No	No	No

Building Type	ABV.	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA
Flexible-Use Building	FUB	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Industrial/Distribution Building	IDB	No	No	No	No	Yes	Yes	Yes	No	No	No
Structured Parking Garage Building	SPB	No	No	Yes	Yes	Yes	Yes	Yes	No	No	No
Civic/Institutional Building	CIB	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No

"Yes" = Allowed; "No" = Not Allowed

[1]Building Type only allowable when permanently affordable at or below 60% AMI.

20.420.050 Understanding the Street Network

Streets and open spaces are vital in codes because they define the public realm, shape how people interact with their environment, and build value around public investment. Streets should be designed as more than transportation corridors, prioritizing pedestrians, cyclists, and social activity through features like wide sidewalks, bike lanes, and active building frontages, fostering connectivity, safety, and a human-scaled urban experience. Open spaces, including parks, plazas, and greenways, complement this network by providing areas for recreation, relaxation, and community gatherings while supporting environmental goals like stormwater management and urban cooling. Together, streets and open spaces create a cohesive, multi-functional public realm that enhances walkability, promotes a sense of place, and improves the overall livability and character of a community. The street and open space network is defined as:

A. Street Network

1. Primary Street. A primary street for a lot is defined as a public right-of-way intended by the city for general traffic circulation and the main means of access to abutting lots which is identified as a any street within the transportation element of the current comprehensive plan as an existing or planned Enhanced Transit Corridor (HCT) or as part of the Primary Pedestrian Network or the Primary Bicycle and Small Mobility Network. Primary streets also include any public right-of-way abutting a public open space, park, greenway, natural area, trail, or otherwise as identified by the City's current comprehensive plan.
2. Side Street. A side street for a lot is defined as a public right-of-way intended by the city for general traffic circulation and a means of access to abutting lots that is not a primary street per this code.

3. Alley. An alley for a lot is defined as a public right-of-way or private easement not over thirty (30') feet in width which provides a secondary means of access to abutting lots, not intended by the city for general traffic circulation.

B. Rules of the Street Network

1. *When more than one primary street is present.* If a lot has frontage onto more than one (1) primary street per definition, the main building must meet the primary street requirement for at least two (2) of those primary streets. Frontage for the lot onto all other streets may be defined as side streets. An example: *A corner lot at two (2) intersecting primary streets must meet the requirements for both of the streets; and a full block lot with all four (4) surrounding streets designated as primary streets must only meet the primary street requirements for two (2) of those streets and the other two (2) may be considered side streets.*

2. *When only one street is present and that street is a primary street*. If the lot only has frontage onto one (1) primary street, the main building is not required to meet requirements for a side street. An example: *In infill lot located on a primary street with no other frontage must only meet the primary street requirements.*

3. *When no primary street is present.* Any lot without frontage onto any primary street must meet the primary street requirements for frontage onto a least one (1) side street. Frontage for the lot onto all other streets may be defined as side streets. An example: *A corner lot at two (2) intersecting side streets must meet the requirements for primary streets on at least one (1) of the side streets; a full block lot with all four (4) surrounding streets designated as side streets must only meet the primary street requirements for one (1) of those streets and the other three (3) may be considered side streets; and infill lot located on a side street with no other frontage must meet the primary street requirements for the side street.*

4. *When a primary street is located at the rear of a lot.* For any lot in which frontage onto any primary street located at the rear of the lot, a planning official will determine which street frontage must meet the requirements for the primary street. An example: An infill lot within a neighborhood subdivision located on a side street has a primary street located at the rear of the lot and the planning official determines that the side street must meet primary street requirements.

20.420.070 Single-Family Residential Building Type (SFB)

A. *Definition.* A Single-Family Residential Building (SFB) is a standalone, single-unit structure typically designed for single-family living. Fully detached, it features no shared walls or connections to adjacent homes. This building type is intended to foster a welcoming streetscape with elements such as porches or stoops that engage with the street. To maximize curb appeal and promote pedestrian-friendly design, garages and parking areas should be located at the rear of the lot or set back from the main façade.

When this building type includes accessory dwelling units (ADUs) as defined by RCW 36.70A.680, 681 and 696, the 040 Flex Plex Building Type (FPB) will be utilized.

This building type may be permitted in the MH Zoning District only when all units, across all structures, are maintained as permanently affordable at or below sixty (60%) percent of Area Median Income (AMI).

B. *Applicability.* Table 20.420.070-1 includes the allowable zoning district for SFB Building Types. Character images are advisory only.

TABLE 20.420.070-1. SINGLE-FAMILY RESIDENTIAL BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	No
Regional Activity Center District (RA)	No
Institutional/Campus District (IC)	No
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	Yes
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

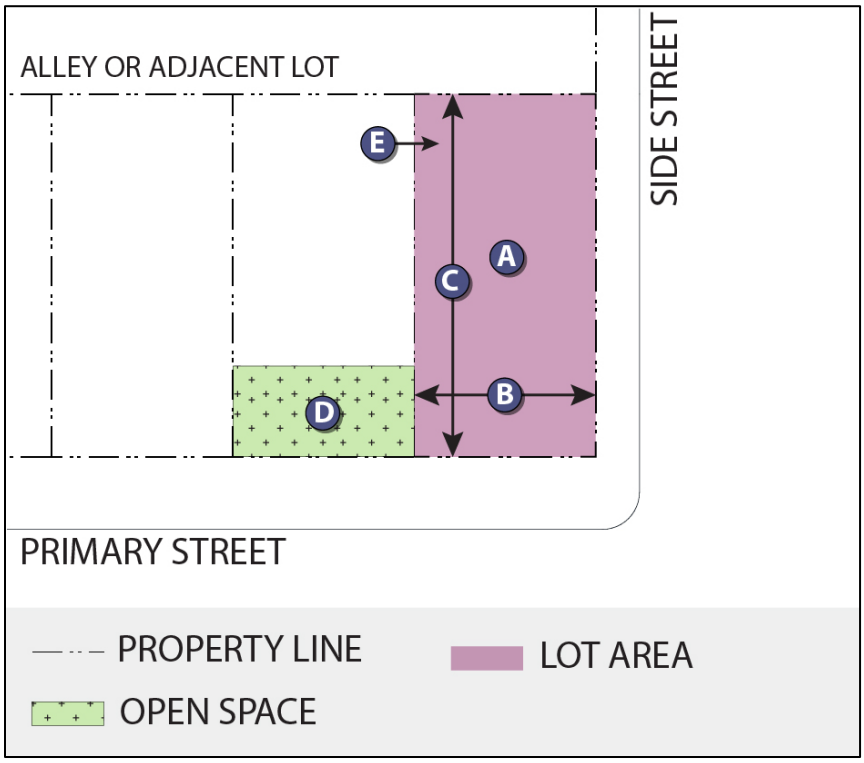
IMAGE 20.420.070-1. SINGLE-FAMILY RESIDENTIAL BUILDING TYPE EXAMPLE



This image is advisory only.

C. Lot Dimension and Coverage.

1. Figure 20.420.070-1. SFB Lot Dimension and Coverage



r. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Five thousand (5,000) square feet.

s. Maximum Lot Width.

i. Fifty (50') feet.

t. Maximum Lot Depth.

i. One hundred (100') feet.

u. Minimum Open Space Area

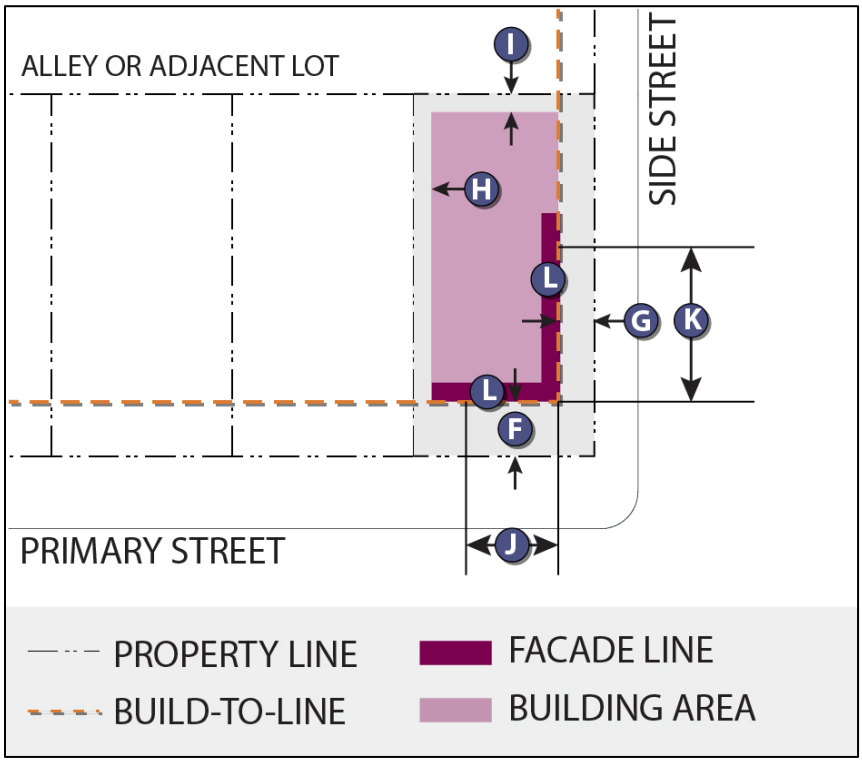
i. Twenty (20%) percent of lot size. Setback areas may contribute to meeting this requirement.

v. Maximum Impervious Area.

i. Sixty-five (65%) percent of lot size. The total square feet of pervious surfaces may be excluded from this calculation.

D. Building Placement and Buildout.

1. Figure 20.420.070-2. SFB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Five (5') to twenty (20') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Five (5') to eighteen (18') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

j. Front Build-Out (Primary Street).

i. Minimum of sixty (60%) percent of the front build-to-line.

ii. For any portion of a garage facing a Primary Street, the width of the garage may be a maximum of ten (10') feet or sixty (60%) percent of the front build-to-line, whichever is the greater dimension.

k. Side Build-Out (Side Street).

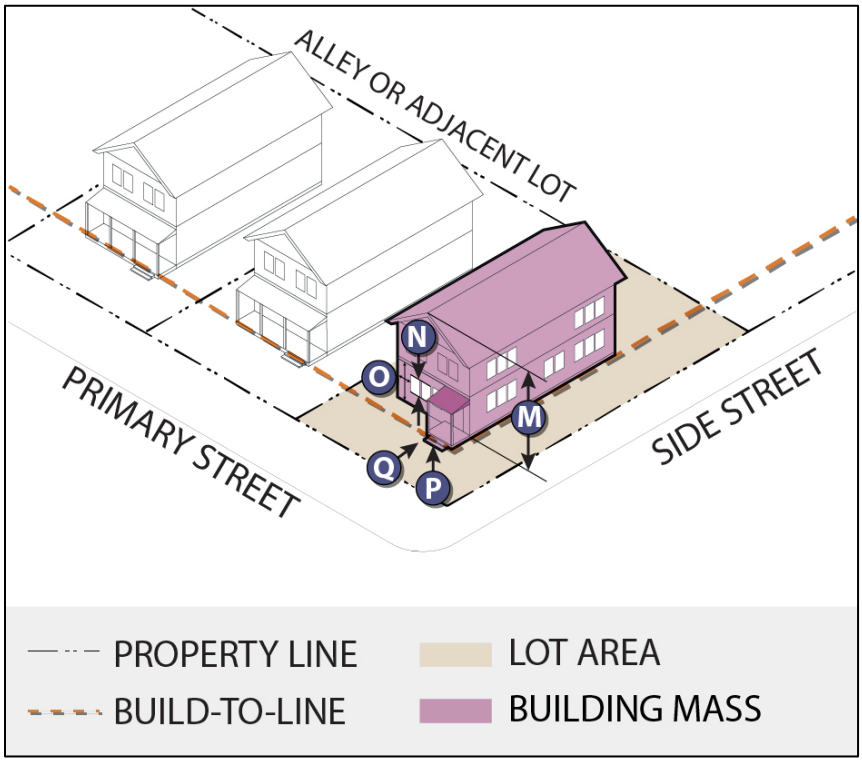
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Façade Length.

i. Maximum one hundred (100') feet without a building break of ten (10') feet between buildings located on the lot or lots.

E. Building Height and Frontage.

1. Figure 20.420.070-3. SFB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifteen (15%) percent transparent windows or doors.

ii. Side Street. Minimum of fifteen (15%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than twenty-five (25') feet without transparency or entrances.

p. Weather Protection.

i. No frontage weather protection requirements.

q. Entrances and Access Points.

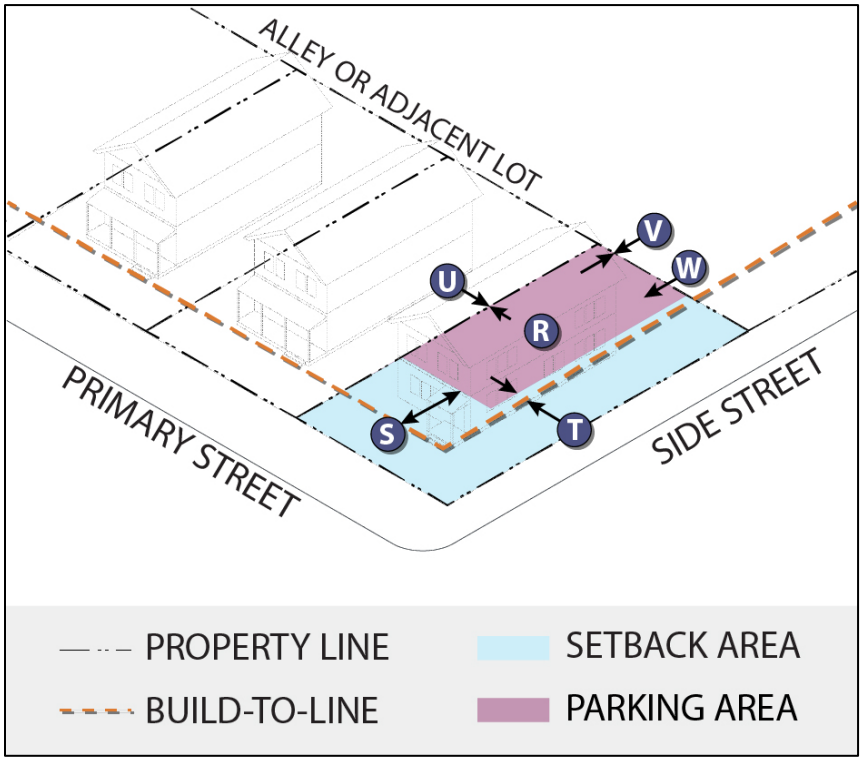
i. Pedestrian entrances must be located facing a primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, pedestrian entrances must face the side street.

ii. Lots with multiple buildings may also have pedestrian entrances from a shared courtyard.

iii. Does not apply to buildings with no street frontage.

F. Parking and Access.

1. Figure 20.420.070-4. SBF Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements

s. Front Setback (Primary Street).

i. To match front build-to-line

ii. Parking is permitted in front of garages provided it is located out of sight triangles and does not extend into any public right-of-way.

t. Side Setback (Side Street).

i. Five (5') feet behind the main building façade.

u. Side Setback (Adjacent Lot)

i. No Minimum from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. No Minimum from the lot line.

w. Access Points.

i. If there is an alley abutting the lot, parking shall be accessed by way of the alley only. If there is side street and no alley, parking may be accessed by way of the side street. Parking may only be accessed from a primary street should there be no other option. See Title 11 Streets and Sidewalks for additional requirements.

G. Overlay Requirements.

1. *Ground Floor Activation.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.070-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.070-2. ALLOWABLE FRONTAGE TYPES FOR SFB

Frontage Type	Allowable
Awnings	No
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	Yes
Courtyard	No
Gallery	No
Light Court	No
Porch	Yes
Stoop	No
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every twenty-five (25’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Not applicable.

d. Minimum Ground Floor-to-Ceiling Height.

   i. Not applicable.

e. Increased Ground Floor Transparency.

i. Not applicable.

2. *Ground Floor Ready.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Not applicable.

b. Increased Ground Floor Transparency

i. Not applicable.

3. Transit-based Height Allowance.

a. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

b. Increased Maximum Height.

i. No maximum.

4. *Other Overlay Requirements*. The following regulations may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.080 Townhouse/Rowhouse Building Type (TRB)

A. *Definition.* A Townhouse/Rowhouse Building (TRB) is a series of side-by-side buildings designed as attached or detached dwelling units on narrower lots facing the street, each separated by shared walls and a defined space. Each unit has its own private entrance, with limited front setbacks that enhance the streetscape with a small front green space or discreet parking access. To preserve the vibrancy of the streetscape, garages are allowed but generally discouraged. The lot layout typically includes a modest rear yard, providing residents with private outdoor space.

This building type includes townhouses as defined by RCW 36.70A.030 and accessory dwelling units (ADUs) per RCW 36.70A.680, 681 and 696.

This building type may be permitted in the MH Zoning District only when all units, across all structures, are maintained as permanently affordable at or below sixty (60%) percent of Area Median Income (AMI).

B. *Applicability.* Table 20.420.080-1 and Image 20.420.080-1 identify the allowable zoning district for TRB Building Types. Character images are advisory only.

TABLE 20.420.080-1. TOWNHOUSE/ROWHOUSE BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	No
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	Yes
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

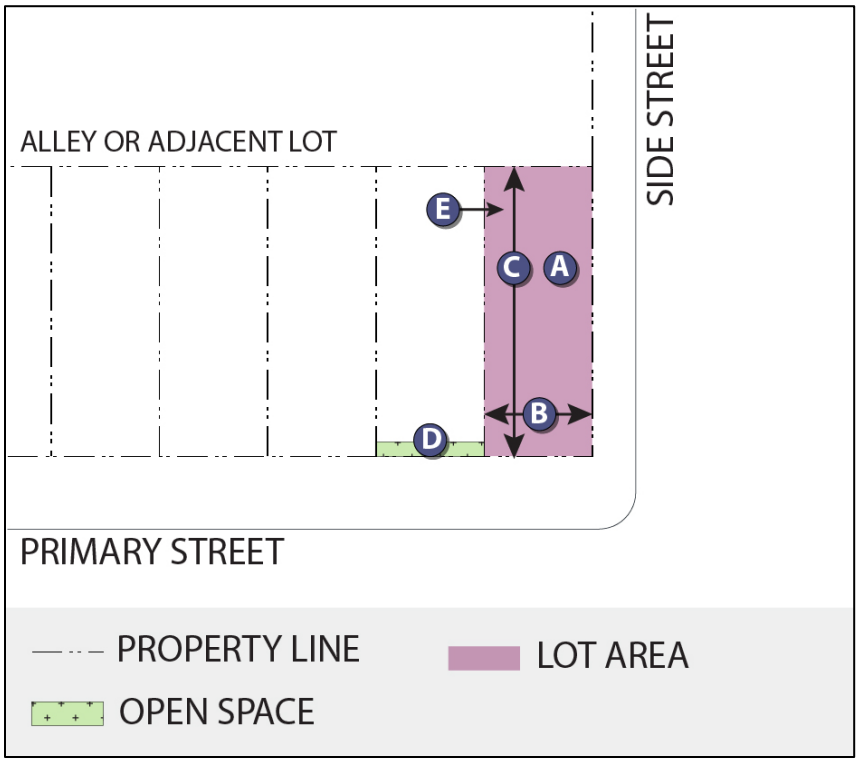
IMAGE 20.420.080-1. TOWNHOUSE/ROWHOUSE BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.080-1. TRB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Five thousand (5,000) square feet.

b. Maximum Lot Width.

i. Fifty (50') feet.

c. Maximum Lot Depth.

i. One-hundred (100') feet.

d. Minimum Open Space Area.

i. Ten (10%) percent of lot size. Setback areas may contribute to meeting this requirement.

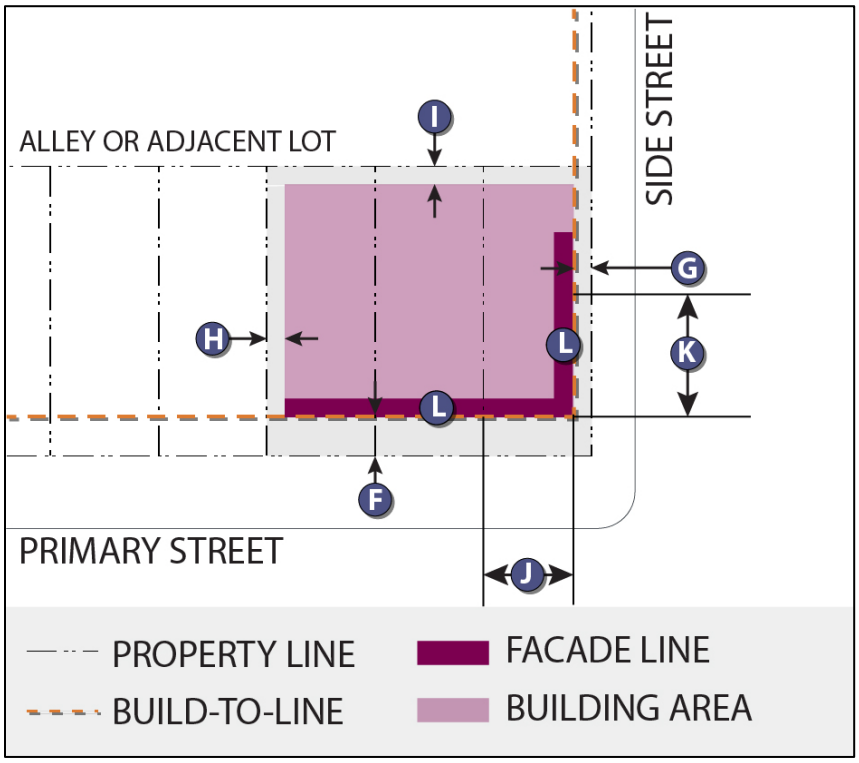
e. Maximum Impervious Area.

i. Eighty-five (85%) percent of lot size.

ii. The total square feet of pervious surfaces may be excluded from this calculation.

D. Building Placement and Buildout.

1. Figure 20.420.080-2. TRB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Five (5') feet to twenty (20') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Five (5') feet to eighteen (18') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

ii. Zero (0') lot line for attached units.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

ii. Minimum of zero (0') feet from alley.

j. Front Build-Out (Primary Street).

i. Minimum of sixty (60%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

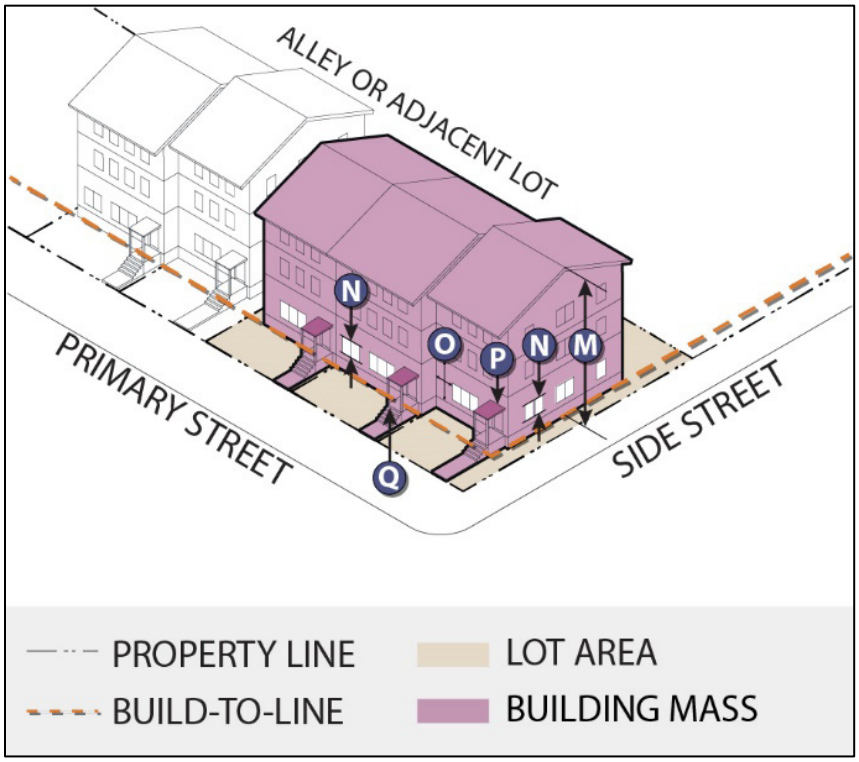
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum one-hundred (100') feet without a building break of ten (10') feet between buildings located on the lot or lots.

E. *Building Height and Frontage.*

1. Figure 20.420.080-3. TRB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifteen (15%) percent transparent windows or doors.

ii. Side Street. Minimum of five (5%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than twenty-five (25') feet without transparency or entrances.

p. Weather Protection.

i. No frontage weather protection requirements.

q. Entrances and Access Points.

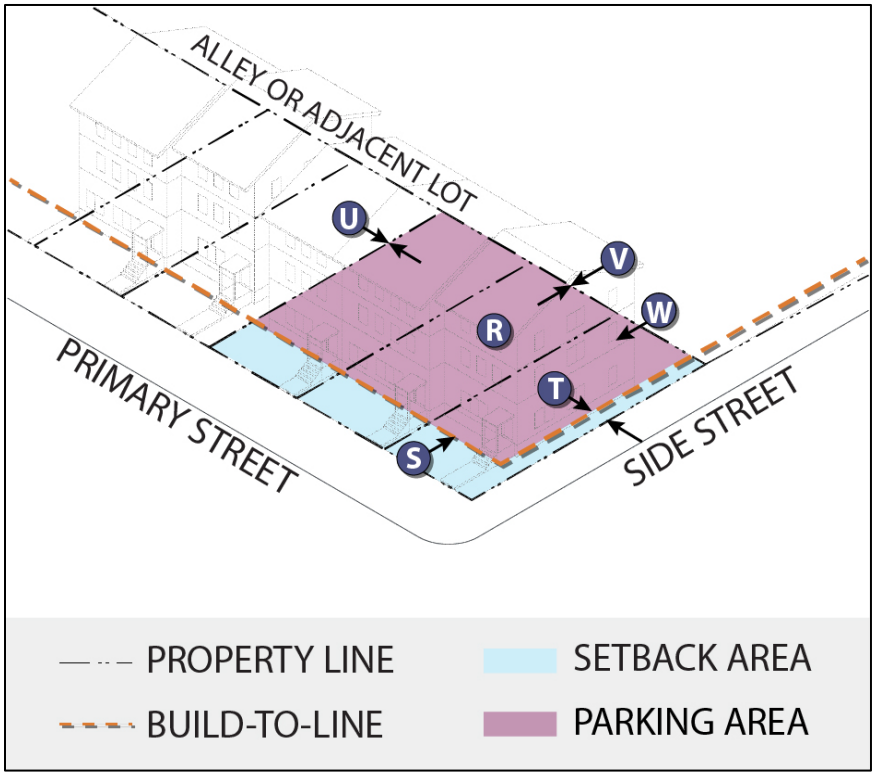
i. Pedestrian entrances must be located facing a primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, pedestrian entrances must face the side street.

ii. Lots with multiple buildings may have also have pedestrian entrances from a shared courtyard.

iii. Does not apply to buildings with no street frontage.

F. *Parking and Access.*

1. Figure 20.420.080-4. TRB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. To match front build-to-line.

ii. Parking is permitted in front of garages provided it is located out of sight triangles and does not extend into any public right-of-way.

t. Side Setback (Side Street).

i. To match the side build-to-line and never in front of the main building facade.

u. Side Setback (Adjacent Lot).

i. No Minimum from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. No Minimum from the lot line.

w. Access Points.

i. If there is an alley abutting the lot, parking shall be accessed by way of the alley only. If there is side street and no alley, parking may be accessed by way of the side street. Parking may only be accessed from a primary street should there be no other option. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements.*

1. Ground Flood Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.080-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.080-2. ALLOWABLE FRONTAGE TYPES FOR TRB

Frontage Type	Allowable
Awnings	No
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	Yes
Courtyard	No
Gallery	No
Light Court	No
Porch	Yes
Stoop	Yes
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every twenty-five (25’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Not applicable.

d. Minimum Ground Floor-to-Ceiling Height.

   i. Not applicable.

e. Increased Ground Floor Transparency.

i. Not applicable.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Not applicable.

b. Increased Ground Floor Transparency.

i. Not applicable.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.090 Stacked Multi-Plex Building Type (SMB)

A. *Definition.* A Stacked Multi-Plex Building (SMB) is designed to house two (2) or more dwelling units in a single building on a single lot. Typically accommodating single or multiple units on each floor, these residences are arranged vertically (i.e., flats on separate floors). Pedestrian access is oriented toward the primary street, with a singular shared entrance. Circulation within the building may be provided through interior corridors or exterior pathways.

This building type includes townhouses as defined by RCW 36.70A.030 and accessory dwelling units (ADUs) per RCW 36.70A.680, 681 and 696.

This building type may be permitted in the MH Zoning District only when all units, across all structures, are maintained as permanently affordable at or below sixty (60%) percent of Area Median Income (AMI).

B. *Applicability.* Table 20.420.090-1 and Image 20.420.090-1 identify the allowable zoning district for SMB Building Types. Character images are advisory only.

TABLE 20.420.090-1. STACKED MULTI-PLEX BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	No
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	Yes
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

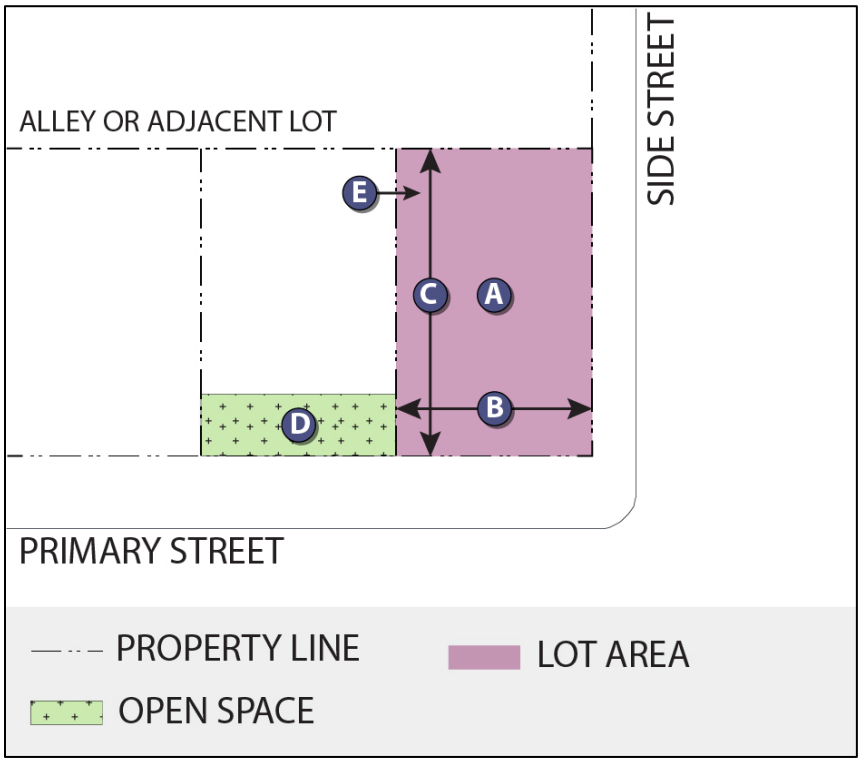
IMAGE 20.420.090-1. STACKED MULTI-PLEX BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.090-1. SMB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

i. Ten (10%) percent of lot size. Setback areas may contribute to meeting this requirement.

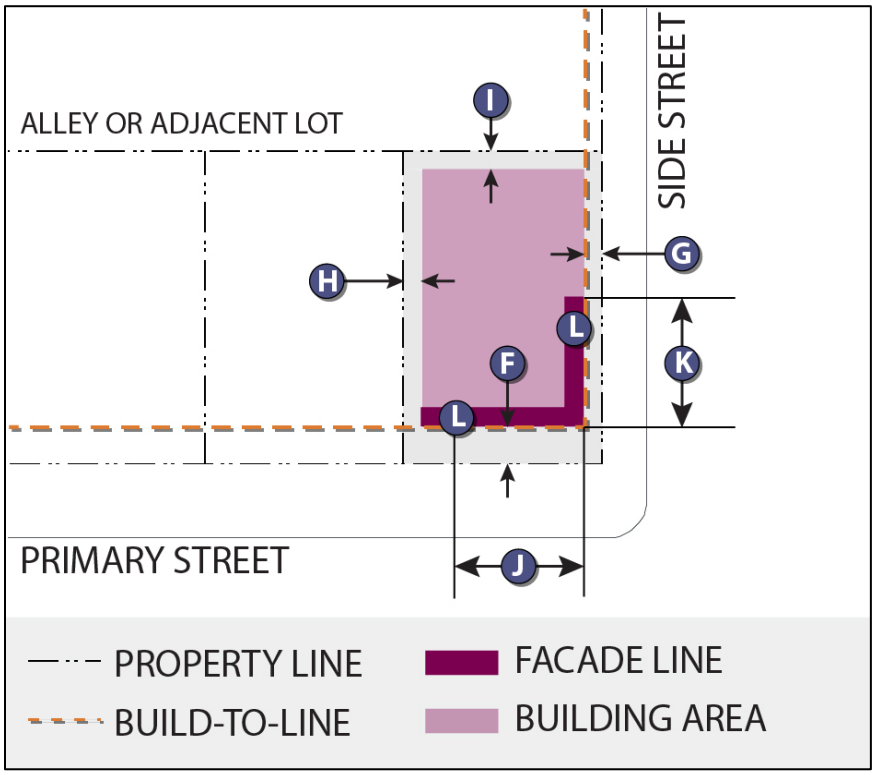
e. Maximum Impervious Area.

i. Eighty-five (85%) percent of lot size.

ii. The total square feet of pervious surfaces may be excluded from this calculation.

D. *Building Placement and Buildout.*

1. Figure 20.420.090-2. SMB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Five (5') feet to twenty (20') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Five (5') feet to eighteen (18') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

ii. No minimum for internal lot lines.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

ii. Minimum of zero (0') feet from alley.

j. Front Build-Out (Primary Street).

i. Minimum of sixty (60%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

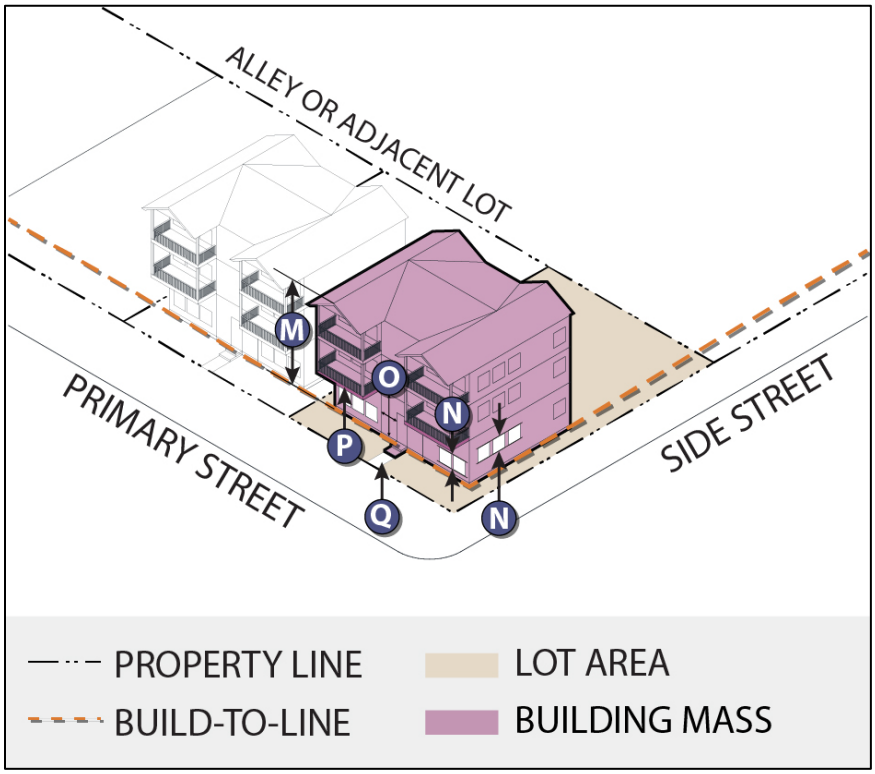
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum one-hundred (100') feet without a building break of ten (10') feet between buildings located on the lot or lots.

E. *Building Height and Frontage.*

1. Figure 20.420.090-3. SMB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning district height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifteen (15%) percent transparent windows or doors.

ii. Side Street. Minimum of ten (10%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than twenty-five (25') feet without transparency or entrances.

p. Weather Protection.

i. No frontage weather protection requirements.

q. Entrances and Access Points.

i. A shared pedestrian entrance must be located facing a primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, the pedestrian entrance must face the side street.

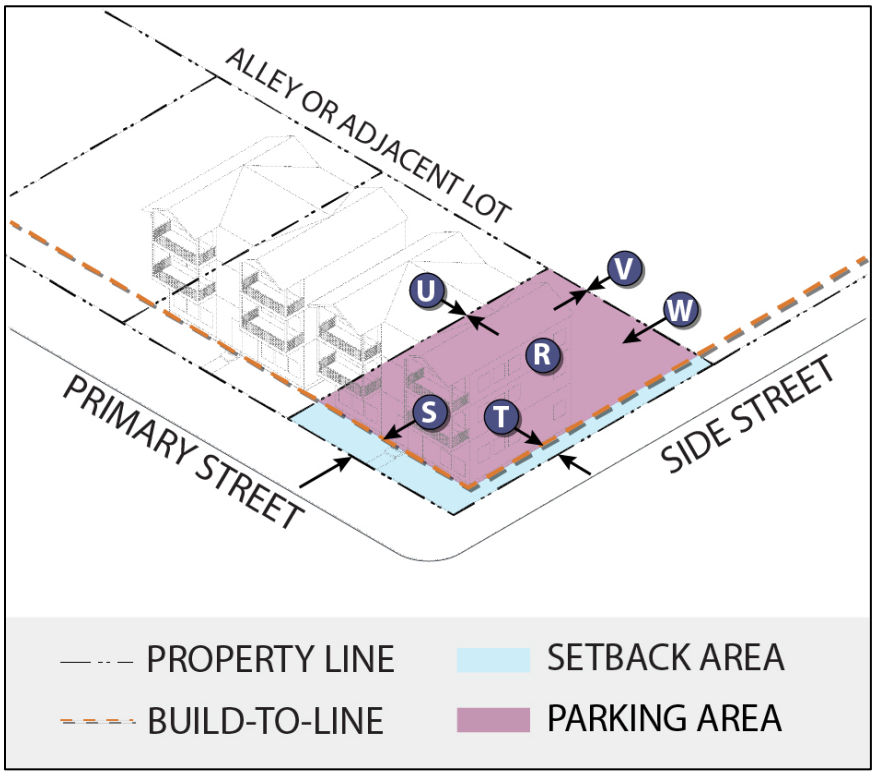
ii. Ground floor residential units may have individual pedestrian entrances.

iii. Lots with multiple buildings may have also have pedestrian entrances from a shared courtyard.

iv. Does not apply to buildings with no street frontage.

F. *Parking and Access.*

1. Figure 20.420.090-4. SMB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. To match front build-to-line.

ii. Parking is permitted in front of garages provided it is located out of sight triangles and does not extend into any public right-of-way.

t. Side Setback (Side Street).

i. To match the side build-to-line and never in front of the main building facade.

u. Side Setback (Adjacent Lot).

i. No Minimum from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. No Minimum from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements.*

1. *Ground Flood Activation*. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.090-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.090-2. ALLOWABLE FRONTAGE TYPES FOR SMB

Frontage Type	Allowable
Awnings	No
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	Yes
Courtyard	Yes
Gallery	No
Light Court	No
Porch	Yes
Stoop	Yes
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every forty (40’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Not applicable.

d. Minimum Ground Floor-to-Ceiling Height.

   i. Not applicable.

e. Increased Ground Floor Transparency.

i. Not applicable.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Not applicable.

b. Increased Ground Floor Transparency.

i. Not applicable.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.100 Flex-Plex Building Type (FPB)

A. *Definition.* A Flex-Plex Building (FPB) is a development form consisting of a cluster of two (2) to six (6) detached or attached units on a single, parent parcel, where not all units must face the street. Buildings include single-unit and rowhouses with up to two (2) accessory dwelling units (attached or detached) and townhouses. This layout creates an active, street oriented presence while accommodating a variety of units within a unified development pattern. Each unit may have its own individual or shared entrances with other units; however, pedestrian access should be a shared access point at the streetscape. Does not include cottage courts.

This building type includes townhouses as defined by RCW 36.70A.030 and accessory dwelling units (ADUs) per RCW 36.70A.680, 681 and 696. This building type may be permitted in the MH Zoning

District only when all units, across all structures, are maintained as permanently affordable at or below sixty (60%) percent of Area Median Income (AMI).

B. *Applicability.* Table 20.420.100-1 and Image 20.420.100-1 identify the allowable zoning district for FPB Building Types. Character images are advisory only.

TABLE 20.420.100-1. FLEX-PLEX BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	No
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	Yes
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

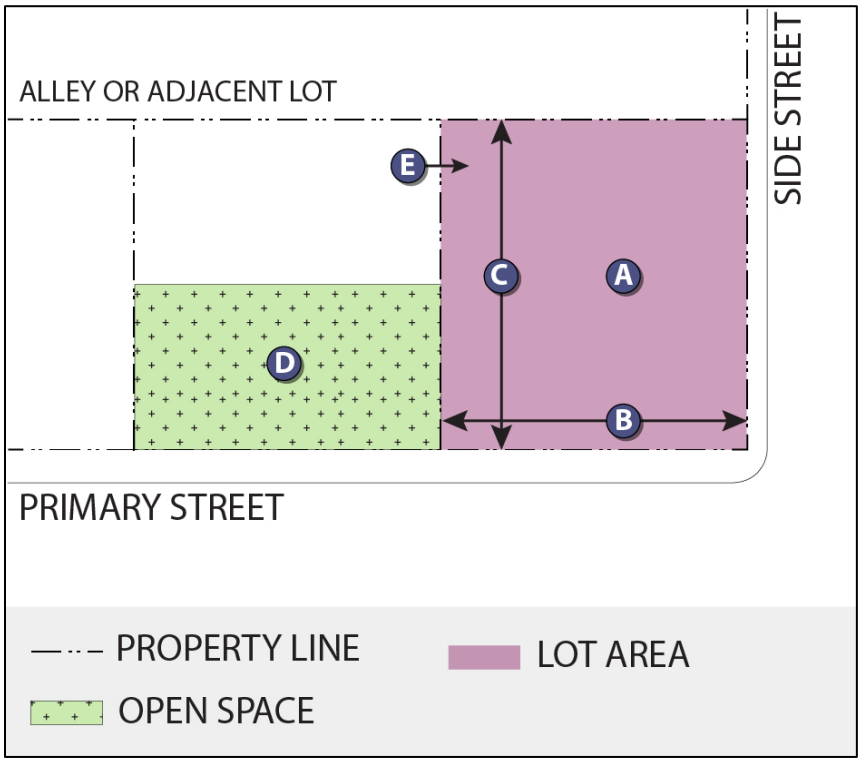
IMAGE 20.420.100-1. FLEX-PLEX BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.100-1. FPB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Forty thousand (40,000) square feet.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

i. Ten (10%) percent of lot size. Setback areas may contribute to meeting this requirement.

e. Maximum Impervious Area.

i. Sixty-five (65%) percent of lot size for less than three (3) units.

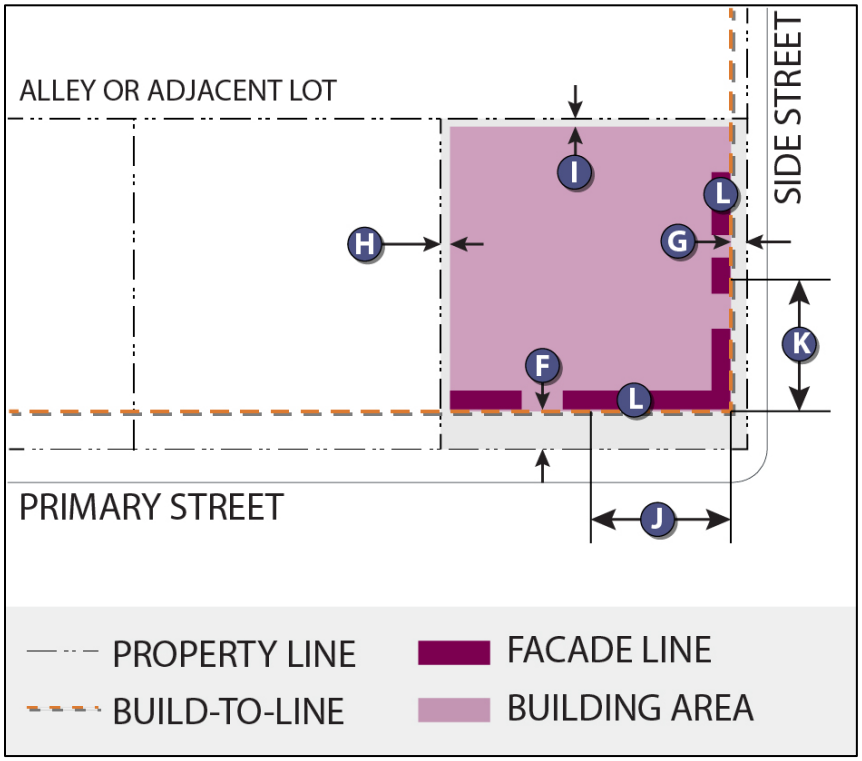
ii. Seventy-five (75%) percent of lot size for four (4) to six (6) units.

iii. Eighty-five (85%) percent of lot size for seven (7) or more dwelling units.

iv. The total square feet of pervious surfaces may be excluded from this calculation.

D. *Building Placement and Buildout*.

1. Figure 20.420.100-2. FPB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Five (5') feet to twenty (20') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Five (5') feet to eighteen (18') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

ii. May be zero lot line between any building on the lot.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

ii. Minimum of zero (0') feet from alley.

j. Front Build-Out (Primary Street).

i. Minimum of sixty (60%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

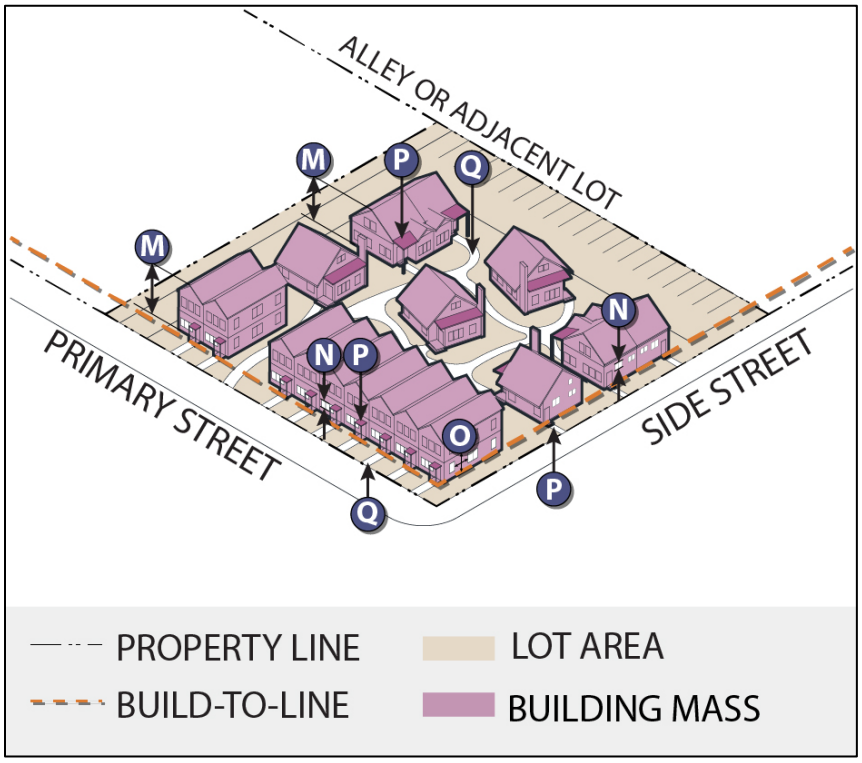
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum one-hundred (100') feet without a building break of ten (10') feet between buildings located on the lot or lots.

E. *Building Height and Frontage*.

1. Figure 20.420.100-3. FPB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifteen (15%) percent transparent windows or doors.

ii. Side Street. Minimum of ten (10%) percent transparent windows or doors.

iii. No requirements on internal buildings.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than twenty-five (25') feet without transparency or entrances.

p. Weather Protection.

i. No frontage weather protection requirements.

q. Entrances and Access Points.

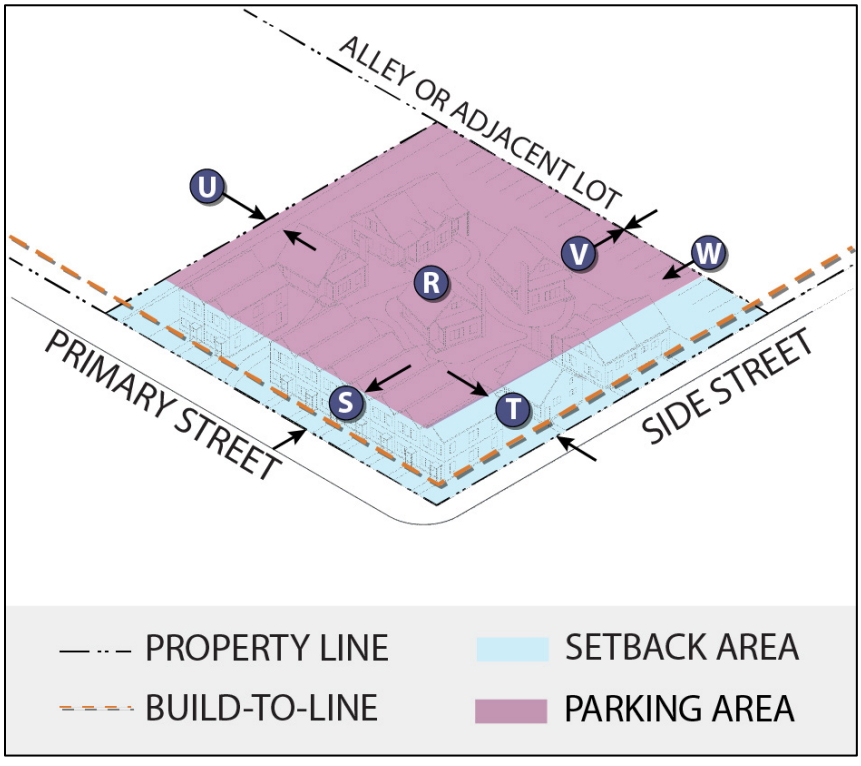
i. Buildings located along the primary street must have pedestrian entrances and must be located facing the primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, the pedestrian entrance must face the side street.

ii. Ground floor residential units throughout the lot may have individual pedestrian entrances and must be accessible by a pathway that connects with the primary street.

iii. Does not apply to buildings with no street frontage.

F. *Parking and Access.*

1. Figure 20.420.100-4. FPB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. To match front build-to-line.

ii. Parking is permitted in front of garages provided it is located out of sight triangles and does not extend into any public right-of-way.

t. Side Setback (Side Street).

i. Minimum of twenty (20') from the lot line.

u. Side Setback (Adjacent Lot).

i. No Minimum from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. No minimum.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements.*

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.100-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.100-2. ALLOWABLE FRONTAGE TYPES FOR FPB

Frontage Type	Allowable
Awnings	No
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	Yes
Courtyard	Yes
Gallery	No
Light Court	No
Porch	Yes
Stoop	Yes
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every forty (40’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Not applicable.

d. Minimum Ground Floor-to-Ceiling Height.

   i. Not applicable.

e. Increased Ground Floor Transparency.

i. Not applicable.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Not applicable.

b. Increased Ground Floor Transparency.

i. Not applicable.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.110 Cottage Court Building Type (CCB)

A. *Definition.* A Cottage Court Building (CCB) is a cluster of small, detached or attached buildings oriented around a shared courtyard space (and not having any private open space for individual units). The units are typically arranged around this shared pedestrian-focused courtyard, with the rear building often positioned perpendicular to the street. Each unit typically has its own entrance; however, pedestrian access should be a shared access point at the streetscape.

This building type includes townhouses as defined by RCW 36.70A.030 and accessory dwelling units (ADUs) per RCW 36.70A.680, 681 and 696.

This building type may be permitted in the MH Zoning District only when all units, across all structures, are maintained as permanently affordable at or below sixty (60%) percent of Area Median Income (AMI).

B. *Applicability.* Table 20.420.110-1 and Image 20.420.110-1 identify the allowable zoning district for CCB Building Types. Character images on this page are advisory only.

TABLE 20.420.110-1. COTTAGE COURT BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	No
Institutional/Campus District (IC)	No
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	Yes
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

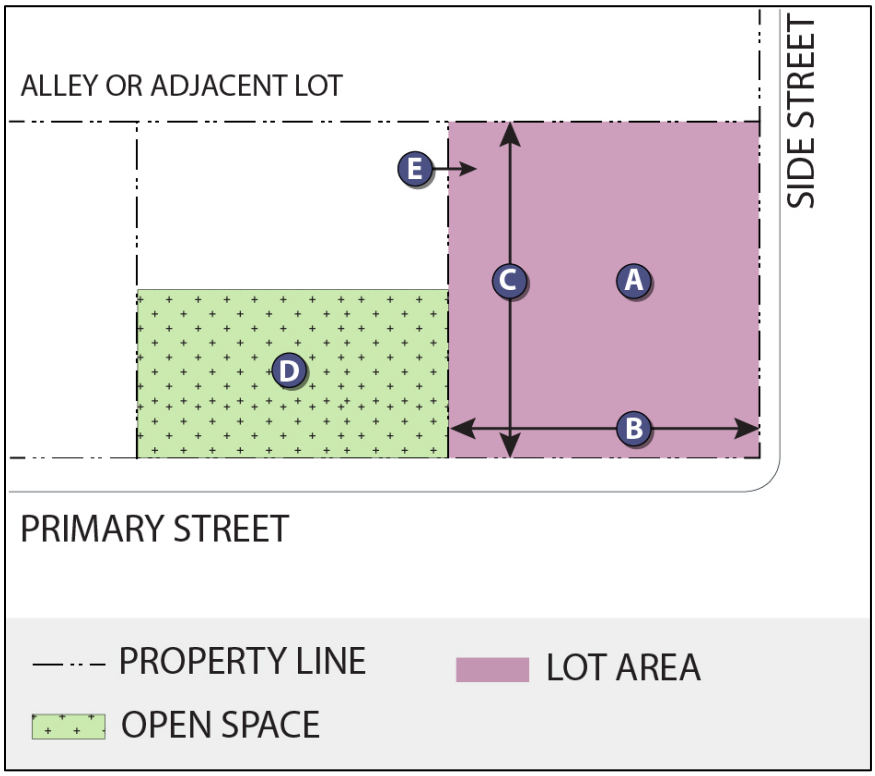
IMAGE 20.420.110-1. COTTAGE COURT BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage.*

1. Figure 20.420.100-1. CCB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Forty thousand (40,000) square feet.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

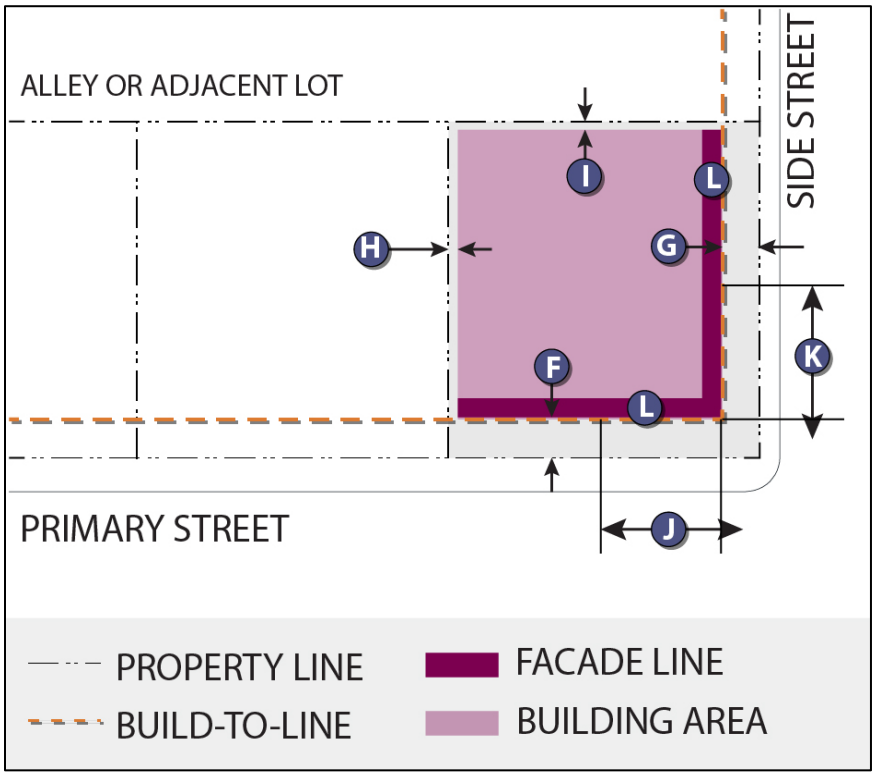
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. *Building Placement and Buildout.*

1. Figure 20.420.110-2. CCB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Five (5') feet to twenty-five (25') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Five (5') feet to eighteen (18') feet from the lot line.\

h. Side Setback Line (Adjacent Lot or Building).

i. Minimum of five (5') feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

ii. Minimum of zero (0') feet from alley.

j. Front Build-Out (Primary Street).

i. Minimum of forty (40%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

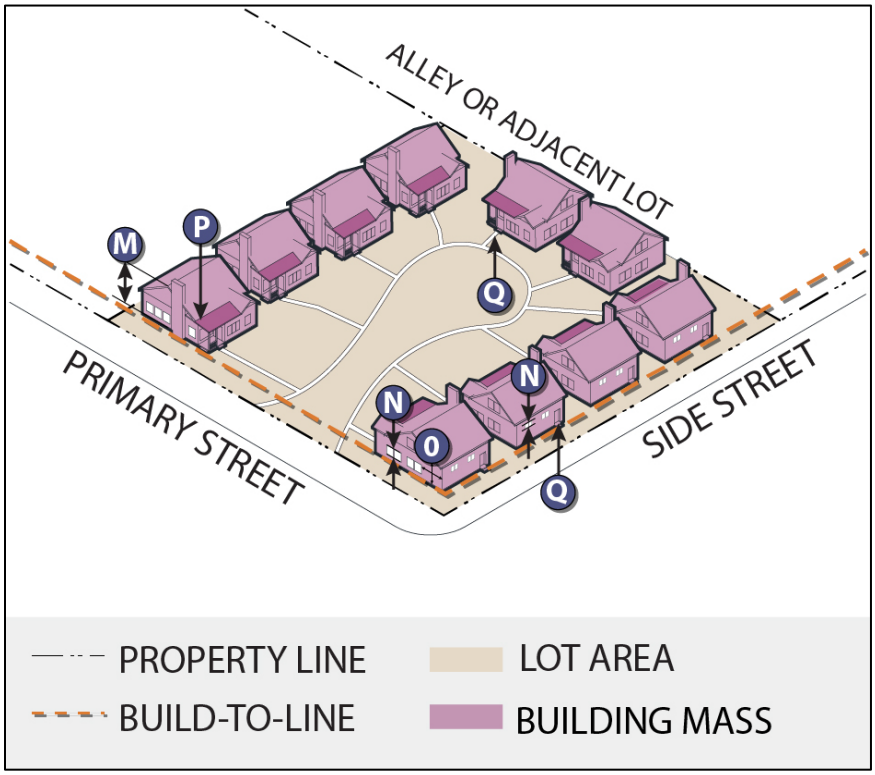
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum one-hundred (100') feet without a building break of ten (10') feet between buildings located on the lot or lots.

E. *Building Height and Frontage.*

1. Figure 20.420.110-3. CCB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of ten (10%) percent transparent windows or doors.

ii. Side Street. Minimum of ten (10%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than twenty-five (25') feet without transparency or entrances.

p. Weather Protection.

i. No frontage weather protection requirements.

q. Entrances and Access Points.

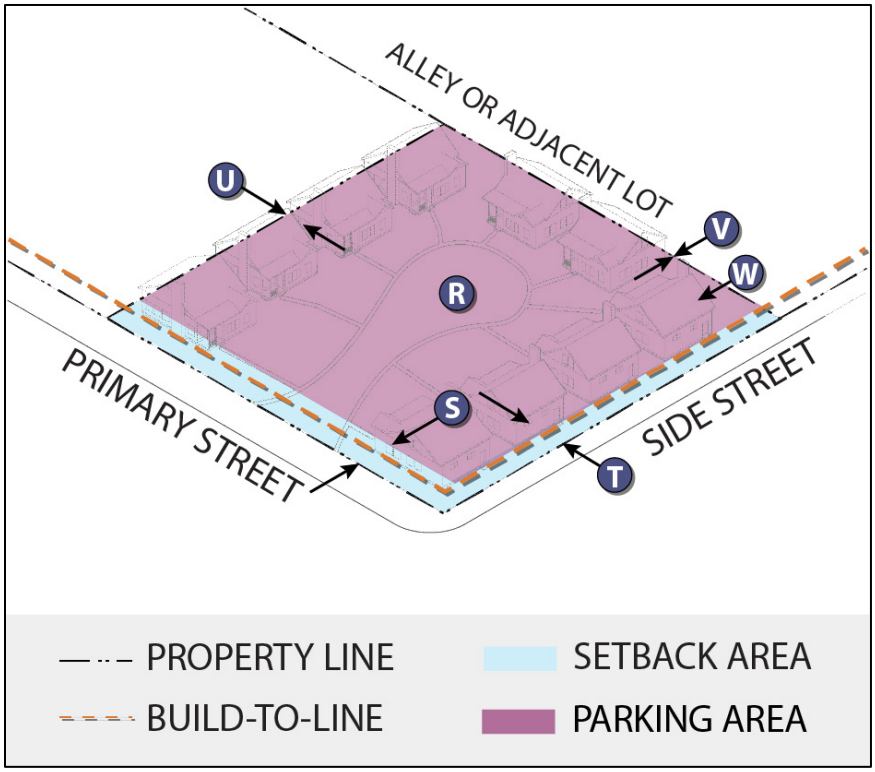
i. Individual buildings that face a primary street or side street must have pedestrian entrances facing those streets and a path that connects to sidewalks.

ii. A pedestrian path must be provided that connects the main entrance of each building to the following: the shared courtyard, shared parking or solid waste storage areas; community buildings, and sidewalks on primary and side streets.

iii. Does not apply to buildings with no street frontage.

F. *Parking and Access.*

1. Figure 20.420.110-4. CCB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. To match front build-to-line.

ii. Parking is permitted in front of garages provided it is located out of sight triangles and does not extend into any public right-of-way.

t. Side Setback (Side Street).

i. Five (5’) feet behind the building façade.

u. Side Setback (Adjacent Lot).

i. No Minimum from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. No minimum.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements.*

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.110-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.110-2. ALLOWABLE FRONTAGE TYPES FOR CCB

Frontage Type	Allowable
Awnings	No
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	Yes
Courtyard	Yes
Gallery	No
Light Court	No
Porch	Yes
Stoop	Yes
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every forty (40’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Not applicable.

d. Minimum Ground Floor-to-Ceiling Height.

   i. Not applicable.

e. Increased Ground Floor Transparency.

i. Not applicable.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Not applicable.

b. Increased Ground Floor Transparency.

i. Not applicable.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.120 Multifamily Building Type (MFB)

A. *Definition.* A Multifamily Building (MFB) is a medium- to large-sized building containing multiple dwelling units for rent or to own arranged along a shared corridor. The units are attached and stacked to achieve higher density. The building typically features a shared entrance for all residents, with some ground-floor units offering individual street-facing entrances. Parking is usually located at the rear of the site or beneath the building to maximize space and maintain an active street presence.

B. *Applicability.* Table 20.420.120-1 and Image 20.420.120-1 identify the allowable zoning district for MFB Building Types. Character images are advisory only.

TABLE 20.420.120-1. MULTIFAMILY BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

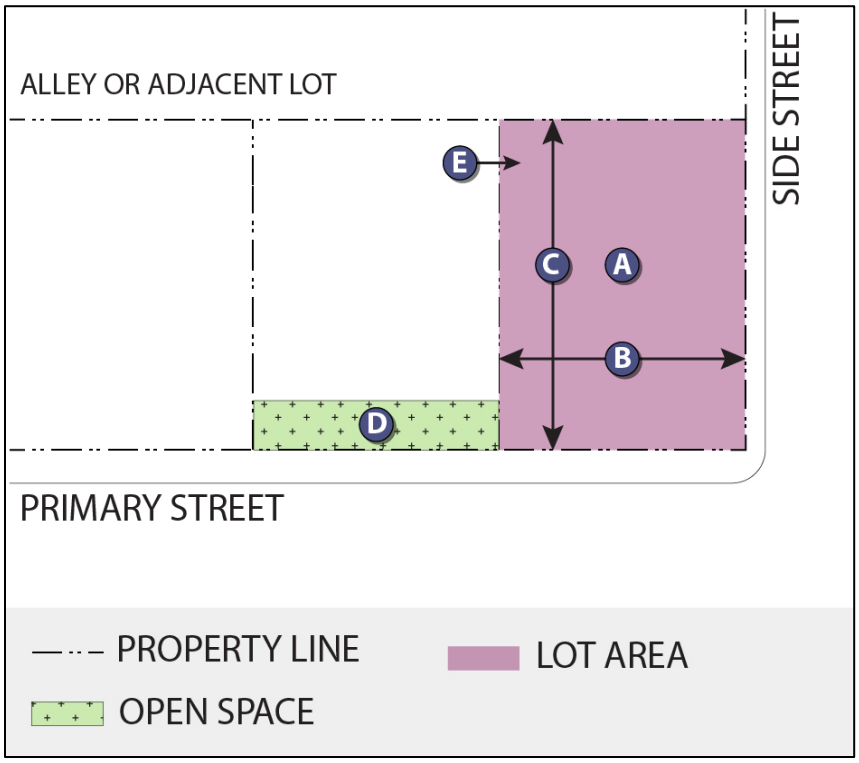
IMAGE 20.420.120-1. MULTIFAMILY BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimensions and Coverage*.

1. Figure 20.420.120-1. MFB Lot Dimensions and Coverage



a. Minimum and Maximum Lot Size

i. Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

i. Fifteen (15%) percent of lot size. Setback areas may contribute to meeting this requirement.

ii. Terraces, verandas, patios, roof decks, and other shared outdoor spaces accessible by all residential units on upper floors may contribute to meeting this requirement.

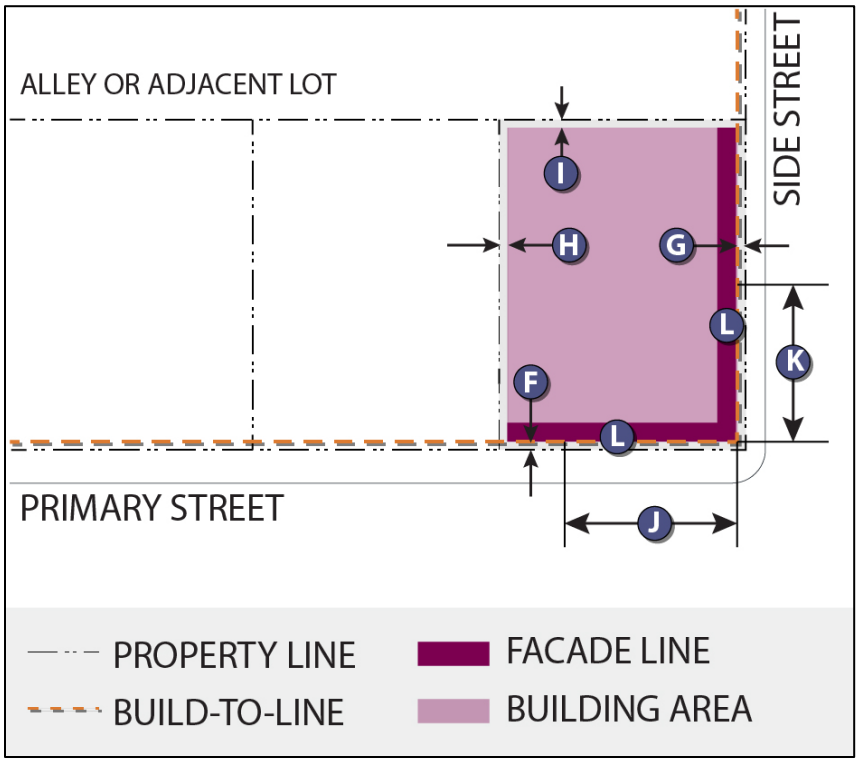
e. Maximum Impervious Area.

i. Ninety (90%) percent of lot size.

ii. The total square feet of pervious surfaces may be excluded from this calculation.

D. *Building Placement and Buildout.*

1. Figure 20.420.120-2. MFB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of five (5') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

g. Side Build-to-Line (Side Street).

i. Maximum of five (5') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

h. Side Setback Line (Adjacent Lot).

i. Subject to screening and buffering standards.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Subject to screening and buffering standards.

j. Front Build-Out (Primary Street).

i. Minimum of eighty (80%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

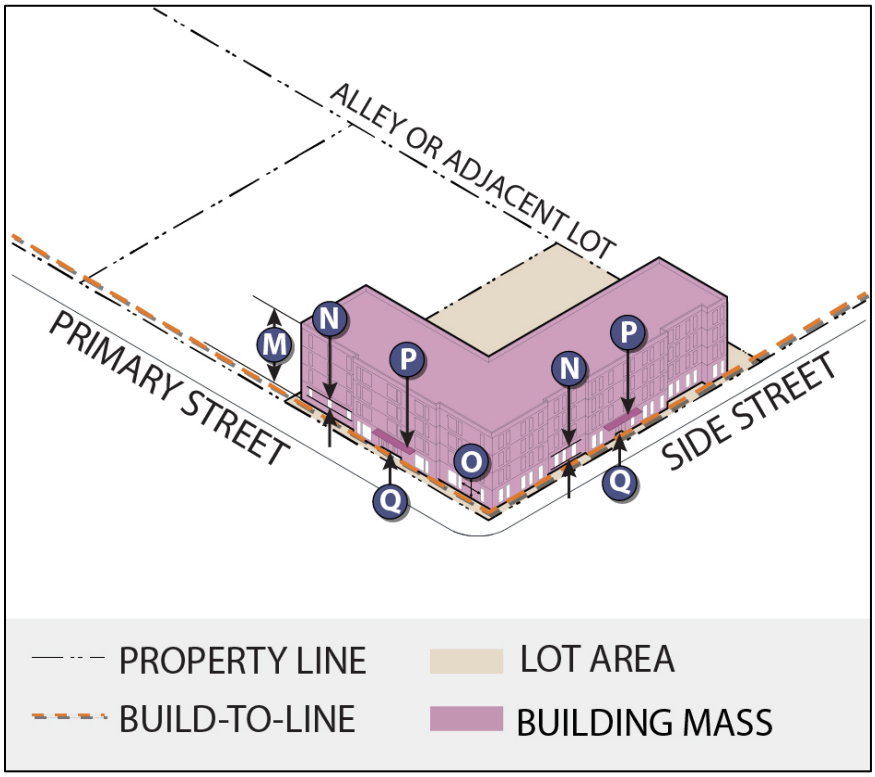
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

E. *Building Height and Frontage*.

1. Figure 20.420.120-3. MFB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifteen (15%) percent transparent windows or doors.

ii. Side Street. Minimum of ten (10%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than thirty (30') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum vertical clearance of ten (10') feet.

iii. Maximum vertical clearance of twenty (20') feet.

iv. Minimum overhang of six (6') feet.

q. Entrances and Access Points.

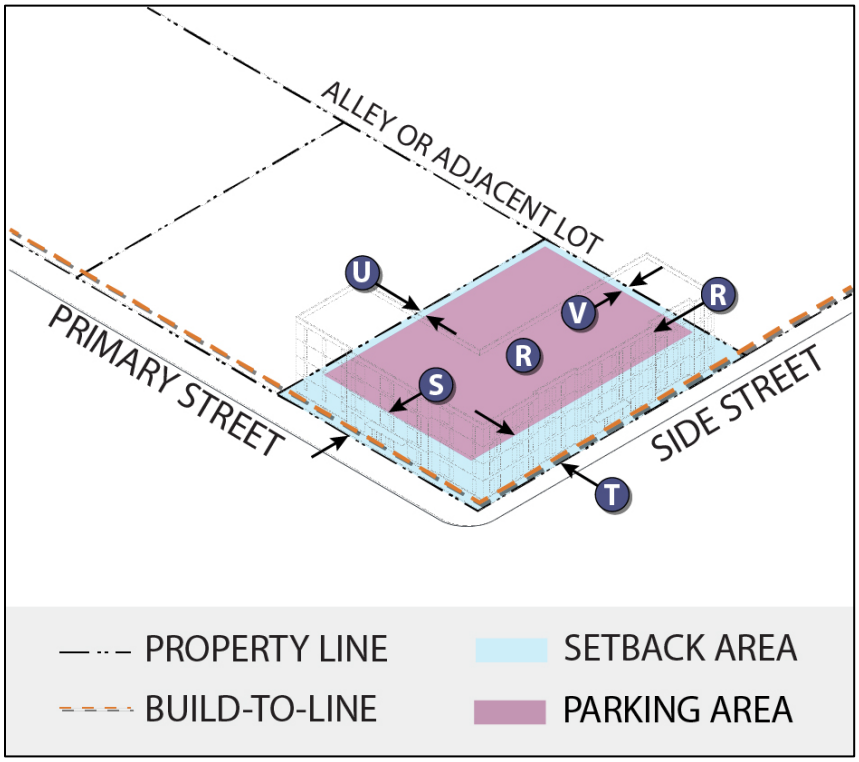
i. A shared pedestrian entrance must be located facing a primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, the pedestrian entrance must face the side street.

ii. Ground floor residential units may have individual pedestrian entrances.

iii. Note: See Section VMC 20.410.160 Encroachments for encroachment standards for frontage.

F. *Parking and Access*.

1. Figure 20.420.120-4. MFB Building Height and Frontage



r. Parking Ratios.

i. See Chapter 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

t. Side Setback (Side Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

u. Side Setback (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements*.

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.120-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.120-2. ALLOWABLE FRONTAGE TYPES FOR MFB

Frontage Type	Allowable
Awnings	Yes
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	No
Courtyard	Yes
Gallery	No
Light Court	No
Porch	Yes
Stoop	Yes
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be common uses supportive of the Primary Residential Use per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of thirty (30%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency.

i. Primary Street. Minimum of thirty (30%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.130 Mid-Rise Residential Building Type (MIB)

A. *Definition.* A Mid-Rise Residential Building (MIB) is a large, zero-lot-line building with multiple attached and stacked dwelling units. The building features a shared street-level entrance leading to an interior lobby, with corridors providing access to each unit. The building should include shared spaces for residents to foster community interaction. Parking is typically below grade and should be accessed from side streets rather than the primary street to maintain an active and pedestrian-friendly frontage.

B. *Applicability.* Table 20.420.130-1 and Image 20.420.130-1 identify the allowable zoning district for MIB Building Types. Character images are advisory only.

TABLE 20.420.130-1. MID-RISE RESIDENTIAL BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	No
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

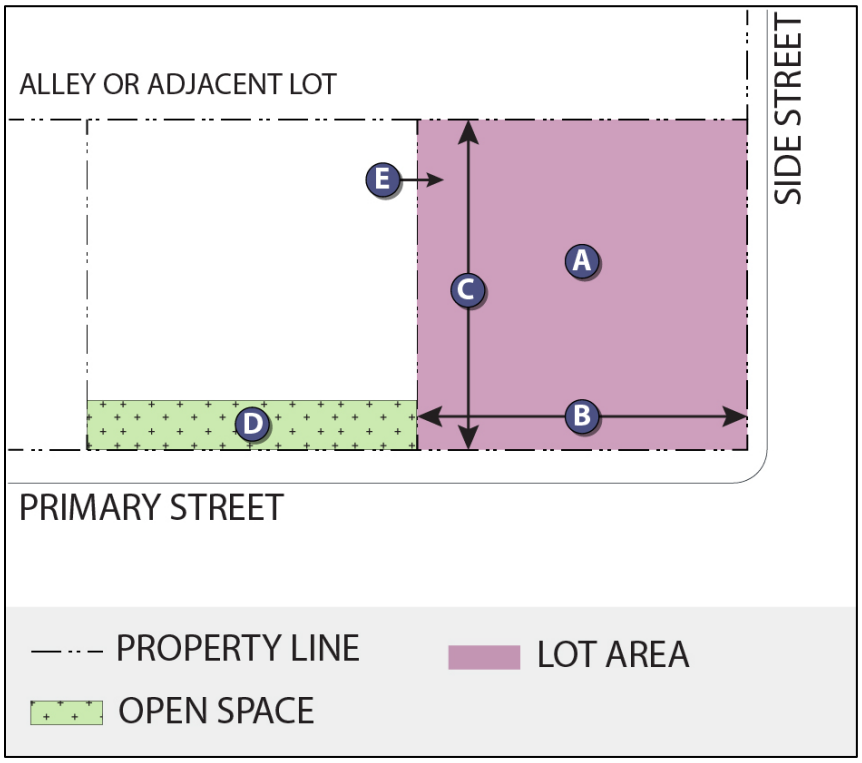
IMAGE 20.420.130-1. MID-RISE RESIDENTIAL BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.130-1. MIB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

i. Ten (10%) percent of lot size. Setback areas may contribute to meeting this requirement.

ii. Terraces, verandas, patios, roof decks, and other shared outdoor spaces accessible by all residential units on upper floors may contribute to meeting this requirement.

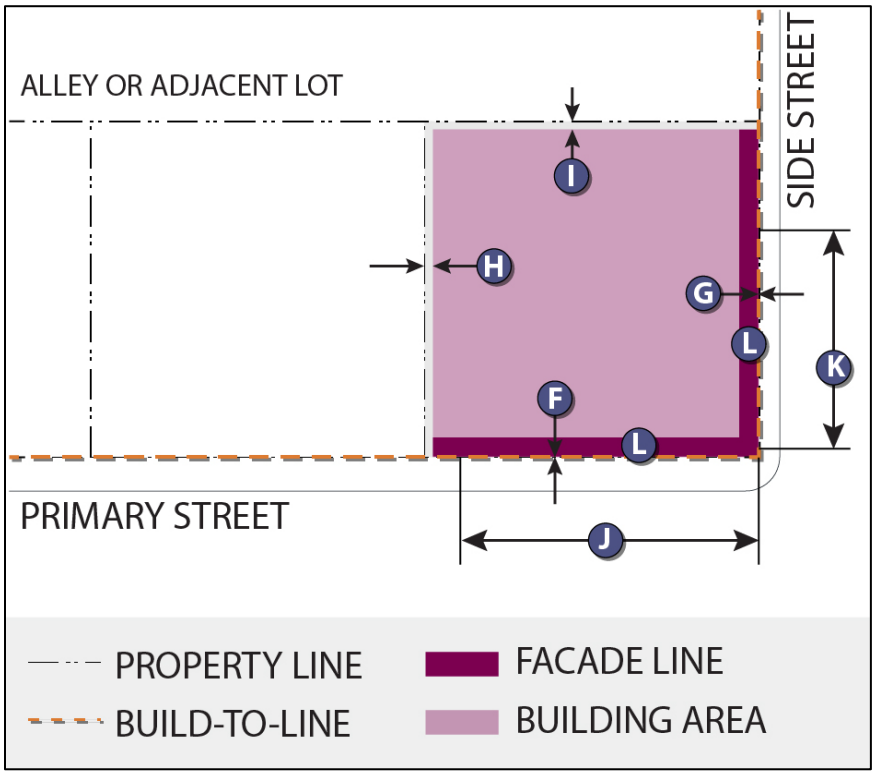
e. Maximum Impervious Area.

i. Ninety-five (95%) percent of lot size.

ii. The total square feet of pervious surfaces may be excluded from this calculation.

D. *Building Placement and Buildout*

1. Figure 20.420.130-2. MIB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of five (5') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

iii. Public plazas, as defined in Chapter 20.150 VMC, shall be considered exempt from the front build-to-line.

g. Side Build-to-Line (Side Street).

i. Maximum of five (5') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

h. Side Setback Line (Adjacent Lot).

i. Subject to screening and buffering standards.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Subject to screening and buffering standards.

j. Front Build-Out (Primary Street).

i. Minimum of eighty (80%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

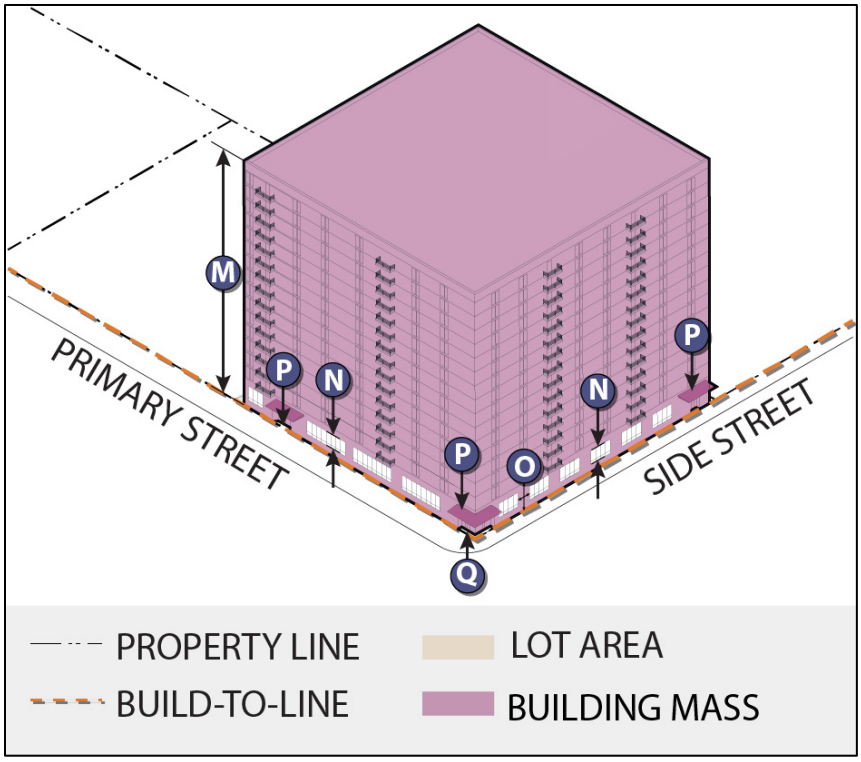
i. Minimum of seventy (70%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

E. *Building Height and Frontage*.

1. Figure 20.420.130-3. MIB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of forty (40%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than thirty (30') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum vertical clearance of ten (10') feet.

iii. Maximum vertical clearance of twenty (20') feet.

iv. Minimum overhang of six (6') feet.

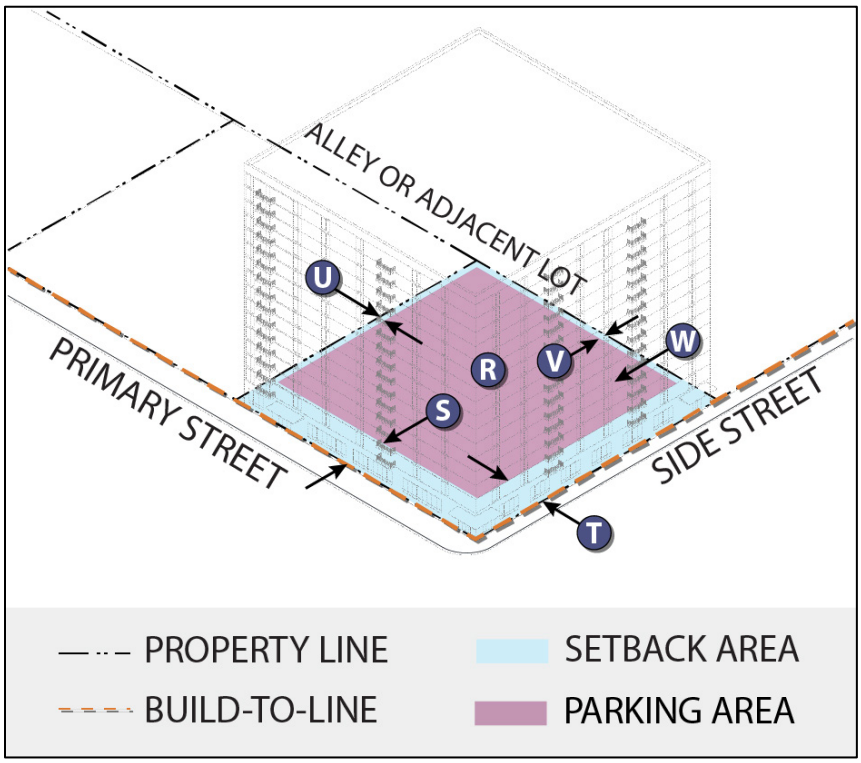
q. Entrances and Access Points.

i. A shared pedestrian entrance must be located facing a primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, the pedestrian entrance must face the side street.

ii. Note: See Section VMC 20.410.160 Encroachments for encroachment standards for frontage.

F. *Parking and Access*.

1. Figure 20.420.130-4. MIB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

t. Side Setback (Side Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

u. Side Setback (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements*.

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.130-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.130-2. ALLOWABLE FRONTAGE TYPES FOR MIB

Frontage Type	Allowable
Awnings	Yes
Balconies	Yes
Bay Windows	Yes
Cafe	No
Common Yard	No
Courtyard	Yes
Gallery	Yes
Light Court	No
Porch	No
Stoop	No
Shopfront	No

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be common uses supportive of the Primary Residential Use per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of fifty (50%) percent transparent windows or doors.

ii. Side Street. Minimum of forty (40%) percent transparent windows or doors.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency.

i. Primary Street. Minimum of fifty (50%) percent transparent windows or doors.

ii. Side Street. Minimum of forty (40%) percent transparent windows or doors.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.140 Mixed-Use Residential Building Type (MXB)

A. *Definition.* A Mixed-Use Residential Building (MXB) is a medium- to large-sized building featuring ground-floor commercial spaces with residential units stacked above. The ground floor consists of multiple entrances, while the residential portion has a shared entrance and lobby. Interior circulation to the upper residential floors is provided through shared corridors that lead to individual units.

B. *Applicability.* Table 20.420.140-1 and Image 20.420.140-1 identify the allowable zoning district for MXB Building Types. Character images are advisory only.

TABLE 20.420.140-1. MIXED-USE RESIDENTIAL BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	No
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

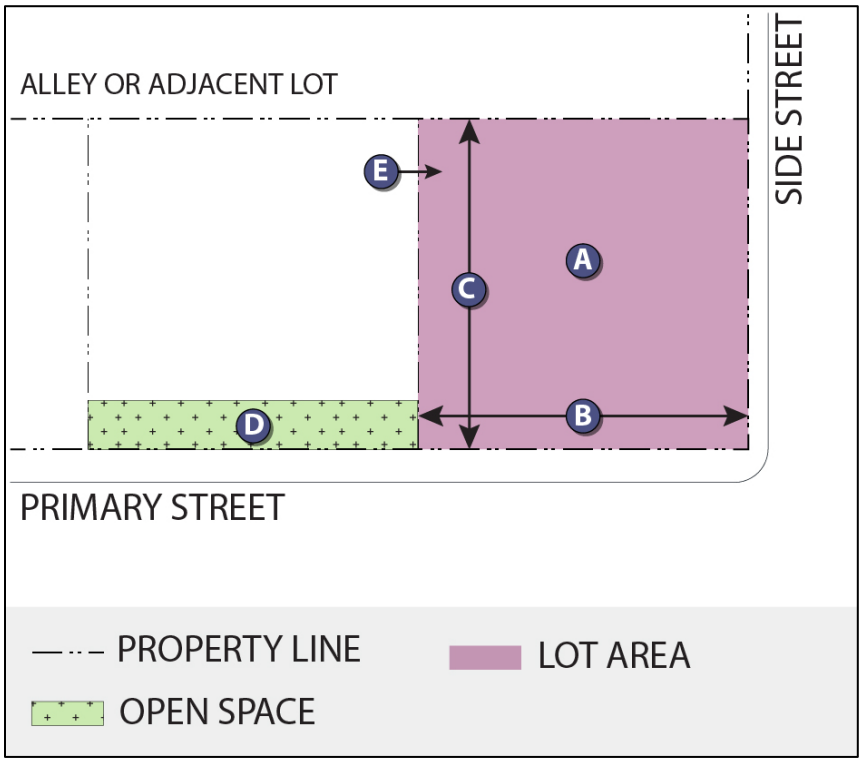
IMAGE 20.420.140-1. MIXED-USE RESIDENTIAL BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.140-1. MXB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

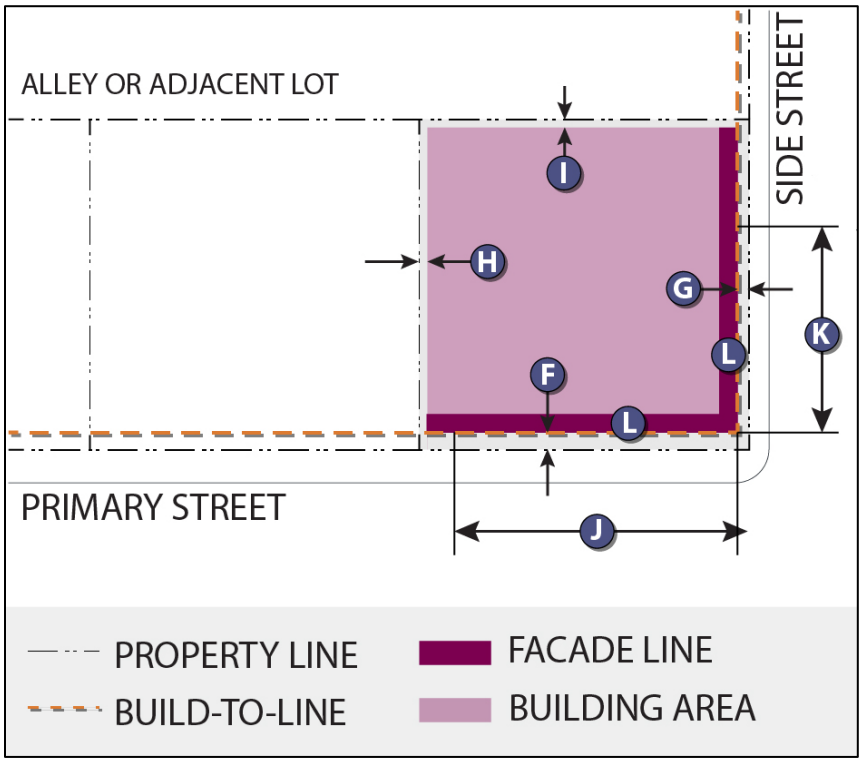
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. *Building Placement and Buildout.*

1. Figure 20.420.140-2. MXB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of five (5') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

iii. Public plazas, as defined in Chapter 20.150 VMC, shall be considered exempt from the front build-to-line.

g. Side Build-to-Line (Side Street).

i. Maximum of five (5') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

h. Side Setback Line (Adjacent Lot).

i. Subject to screening and buffering standards.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Subject to screening and buffering standards.

j. Front Build-Out (Primary Street).

i. Minimum of ninety (90%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

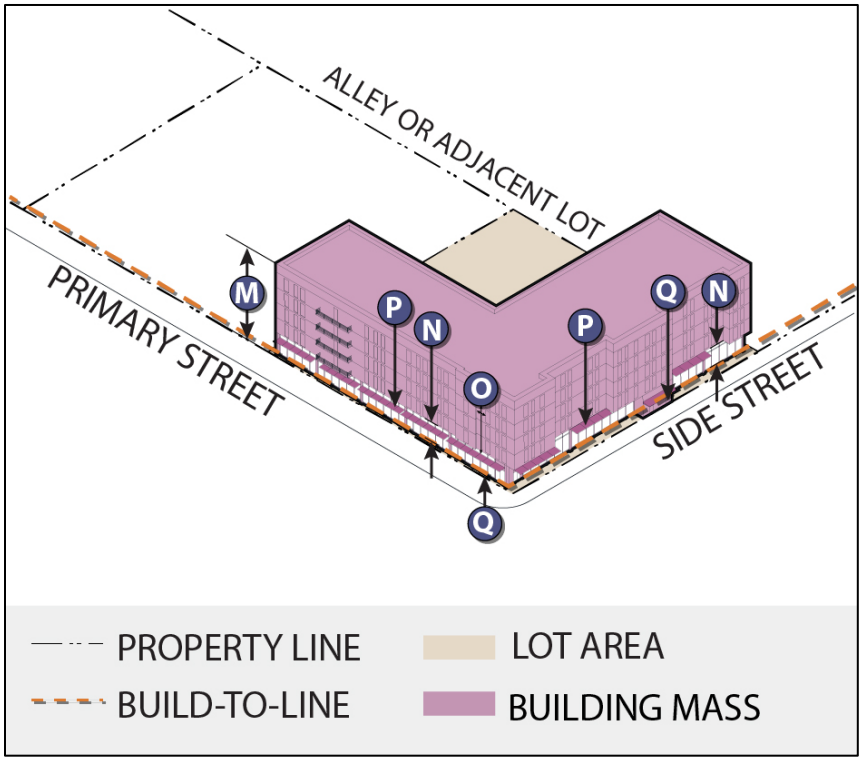
i. Minimum of seventy (70%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

E. *Building Height and Frontage.*

1. Figure 20.420.140-3. MXB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

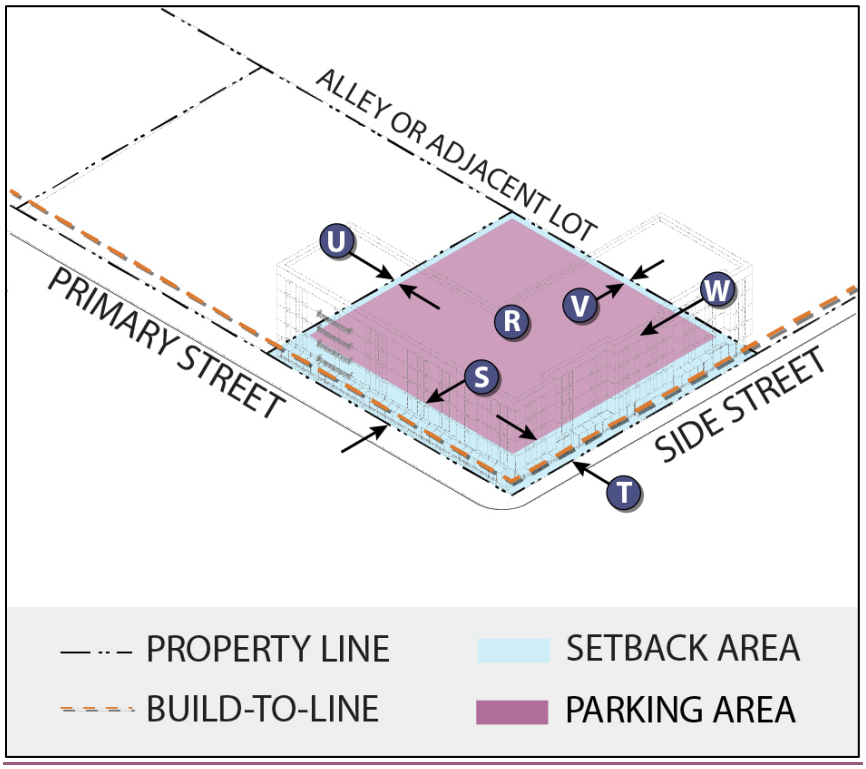
i. Primary Street. Minimum of fifty (50%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).
    i. No blank frontage walls greater than thirty (30') feet.
p. Weather Protection.
    i. Required at all primary and side street entrances only when building facade is located at the lot line.
    ii. Minimum of seventy (70%) percent linear coverage on primary streets and thirty (30%) percent on side streets.
    iii. Minimum vertical clearance of ten (10') feet.
    iv. Maximum vertical clearance of twenty (20') feet.
    v. Minimum overhang of six (6') feet.
q. Entrances and Access Points.
    i. No requirements for shared pedestrian entrances.
    ii. Ground floor residential units may have individual pedestrian entrances.
    iii. Note: See Section VMC 20.410.160 Encroachments for encroachment standards for frontage.

F. *Parking and Access*.

1. Figure 20.420.140-4. MXB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading for parking requirements.

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

t. Side Setback (Side Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

u. Side Setback (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements*.

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.140-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.140-2. ALLOWABLE FRONTAGE TYPES FOR MXB

Frontage Type	Allowable
Awnings	Yes
Balconies	Yes
Bay Windows	Yes
Cafe	Yes
Common Yard	No
Courtyard	Yes
Gallery	Yes
Light Court	Yes
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of forty (40%) percent transparent windows or doors.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of forty (40%) percent transparent windows or doors.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.150 Mixed-Use Office Building Type (MOB)

A. *Definition.* A Mixed-Use Office Building (MOB) is a medium- to large-sized building designed to feature ground-floor commercial spaces with office space above. The retail areas have independent entrances for easy access to street-level shops. Office space on the upper floors is accessed via interior circulation, which can include a central corridor or open area, depending on whether the floor is occupied by a single tenant or divided among multiple tenants.

B. *Applicability.* Table 20.420.150-1 and Image 20.420.150-1 identify the allowable zoning district for MOB Building Types. Character images are advisory only.

TABLE 20.420.150-1. MIXED-USE OFFICE BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	Yes
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

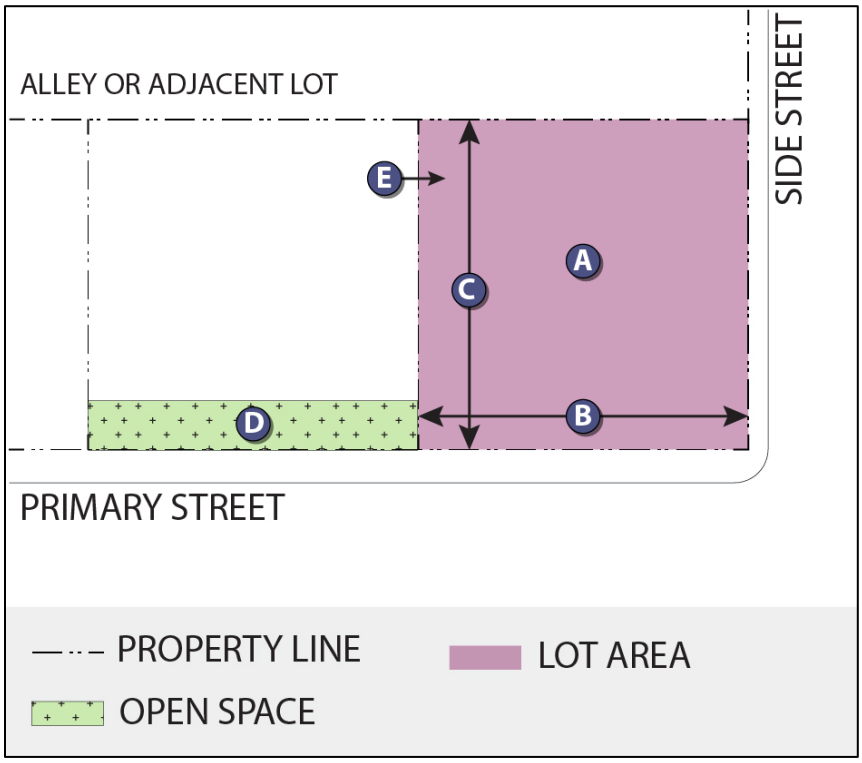
IMAGE 20.420.150-1. MIXED-USE OFFICE BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.150-1. MOB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

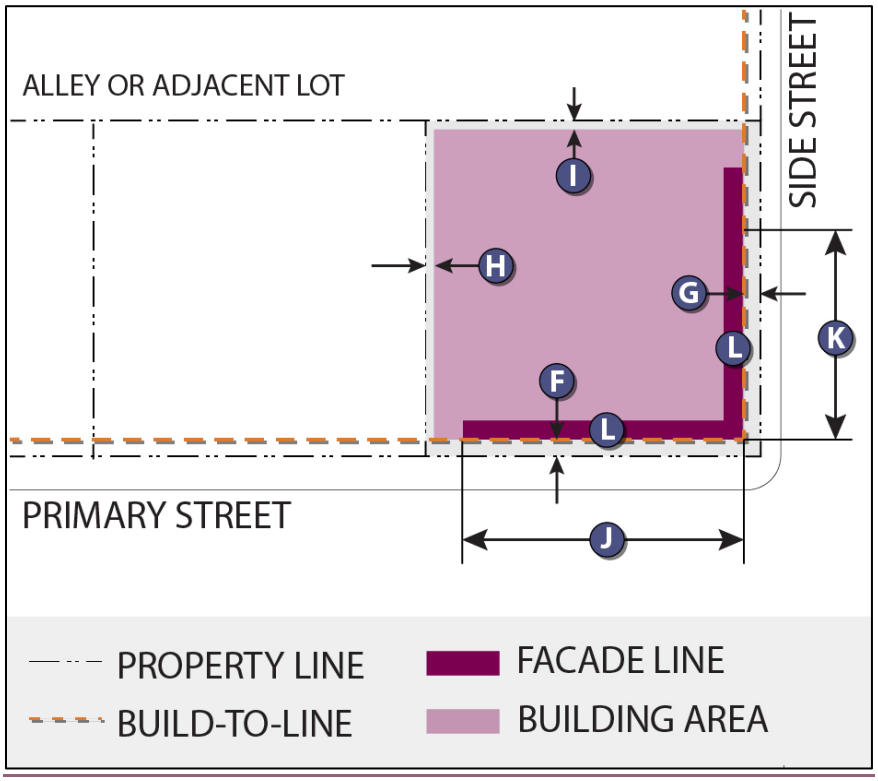
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. *Building Placement and Buildout.*

1. Figure 20.420.150-2. MOB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of ten (10') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

g. Side Build-to-Line (Side Street).

i. Maximum of ten (10') feet from the lot line.

ii. May encroach the build-to-line with a ROW permit.

h. Side Setback Line (Adjacent Lot).

i. Subject to screening and buffering standards.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Subject to screening and buffering standards.

j. Front Build-Out (Primary Street).

i. Minimum of ninety (90%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

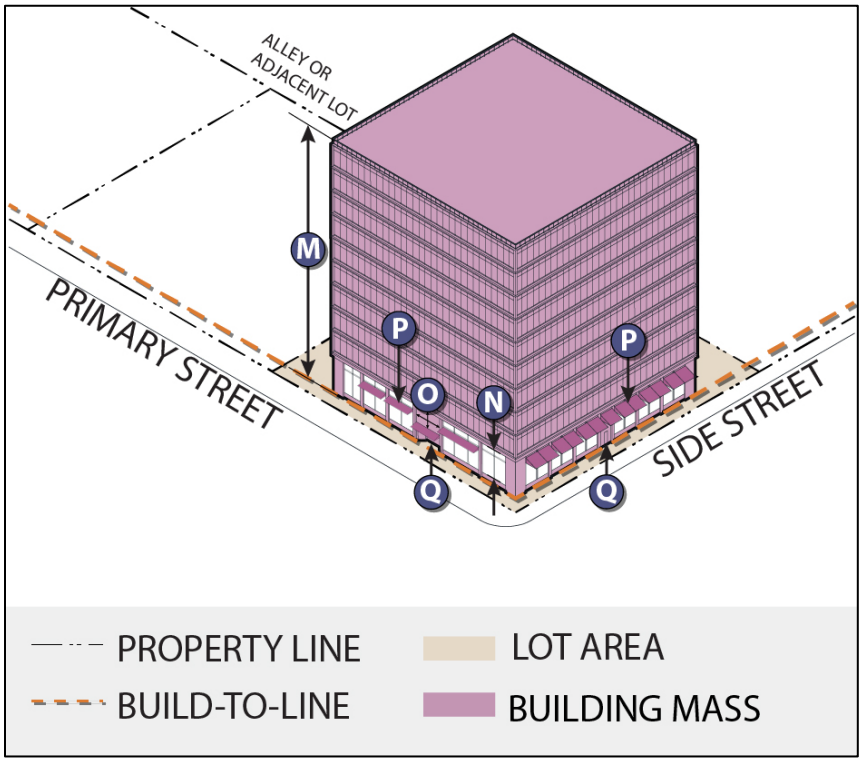
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

E. *Building Height and Frontage*.

1. Figure 20.420.150-3. MOB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifty (50%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than thirty (30') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum of seventy (70%) percent linear coverage on primary streets.

iii. Minimum vertical clearance of ten (10') feet.

iv. Maximum vertical clearance of twenty (20') feet.

v. Minimum overhang of six (6') feet.

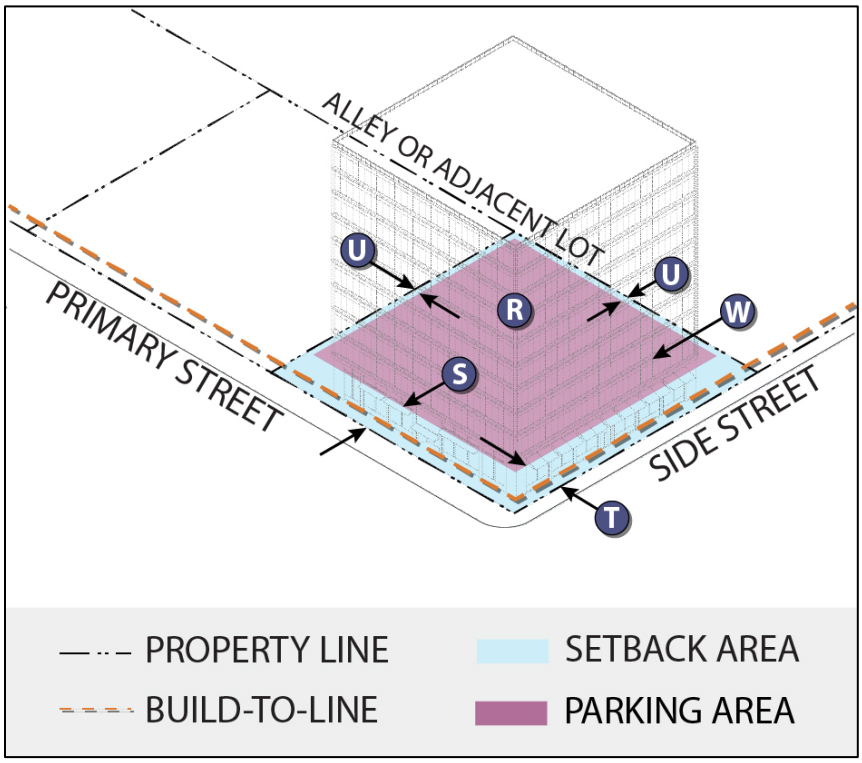
q. Entrances and Access Points.

i. No requirements for shared pedestrian entrances.

ii. Note: See Chapter VMC 20.410.160 Encroachments for encroachment standards for frontage.

F. *Parking and Access*.

1. Figure 20.420.150-4. MOB Parking and Access



r. Parking Ratios.

i. See Chapter 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. Minimum of twenty (20’) feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

t. Side Setback (Side Street).

i. Minimum of twenty (20’) feet from the lot line.

ii. Zero-lot-line if contained within building and buffered.

u. Side Setback (Adjacent Lot).

i. Minimum of five (5’) feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5’) feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements*.

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.150-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.150-2. ALLOWABLE FRONTAGE TYPES FOR MOB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	Yes
Common Yard	No
Courtyard	Yes
Gallery	Yes
Light Court	No
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

3. Transit-based Height Allowance: Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements: The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.160 Commercial Block Building Type (CBB)

A. *Definition.* A Commercial Block Building (CBB) is a small, low-rise rectangular building with individual entrances for in-line shops or stores, designed to foster an active and engaging street presence. The building should be oriented with entrances facing the street, while parking is placed at the rear to prioritize pedestrian access.

B. *Applicability.* Table 20.420.160-1 and Image 20.420.160-1 identify the allowable zoning district for CBB Building Types. Character images are advisory only.

TABLE 20.420.160-1. COMMERCIAL BLOCK BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	Yes
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

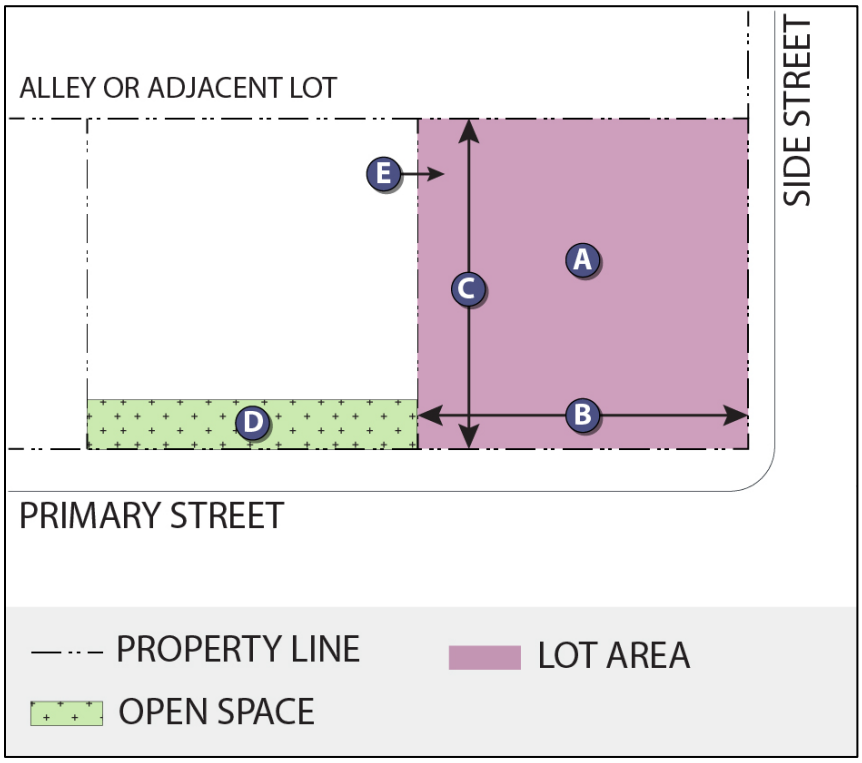
IMAGE 20.420.160-1. COMMERCIAL BLOCK BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.160-1. CBB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

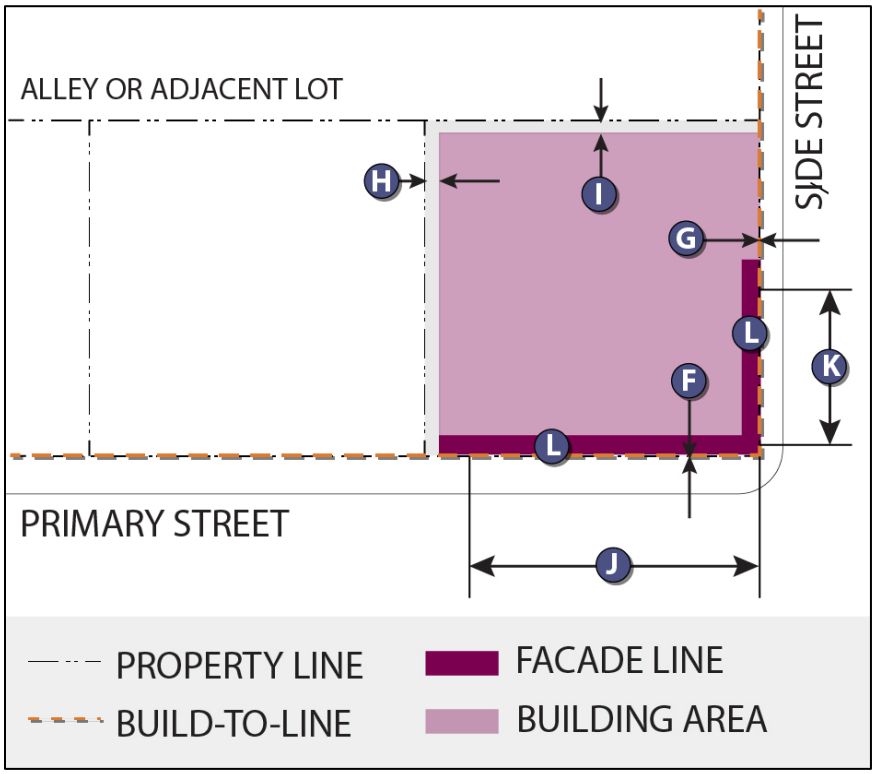
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. *Building Placement and Buildout.*

1. Figure 20.420.160-2. CBB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of five (5') feet from the lot line.

ii. Public plazas, as defined in Chapter 20.150 VMC, shall be considered exempt from the front build-to-line.

g. Side Build-to-Line (Side Street).

i. Maximum of five (5') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Subject to screening and buffering standards.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Subject to screening and buffering standards.

j. Front Build-Out (Primary Street).

i. Minimum of ninety (90%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

i. Minimum of fifty (50%) percent of the side build-to-line.

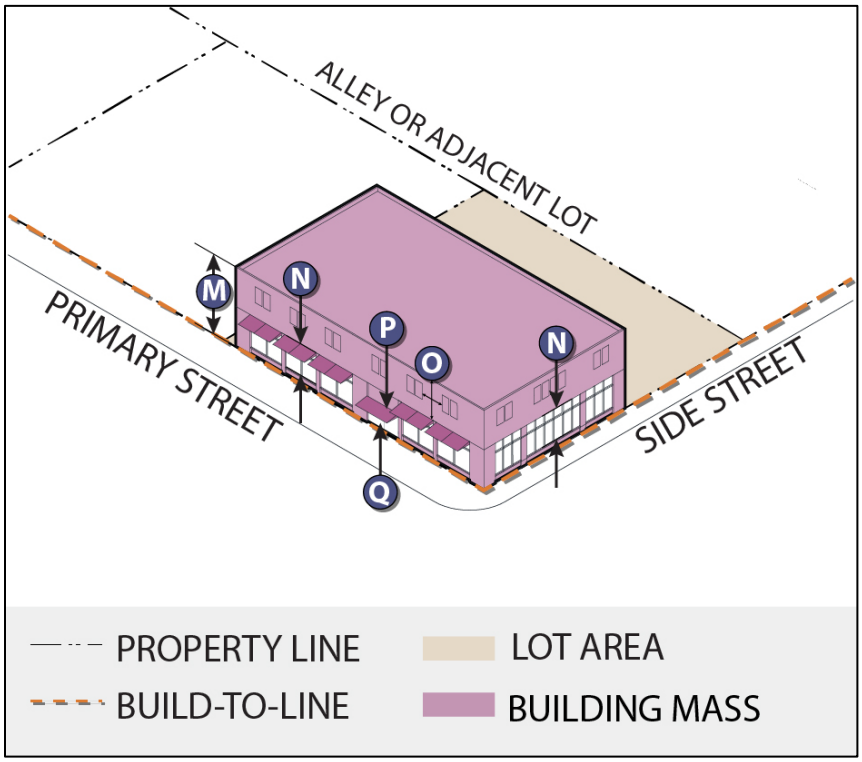
l. Maximum Facade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

ii. Note: Building Placement and Buildout Standards are not applicable on building types located within the IC, IE, and HI Districts.

E. *Building Height and Frontage*.

1. Figure 20.420.160-3. CBB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifty (50%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than fifteen (15') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum of seventy (70%) percent linear coverage on primary streets.

iii. Minimum vertical clearance of ten (10') feet.

iv. Maximum vertical clearance of twenty (20') feet.

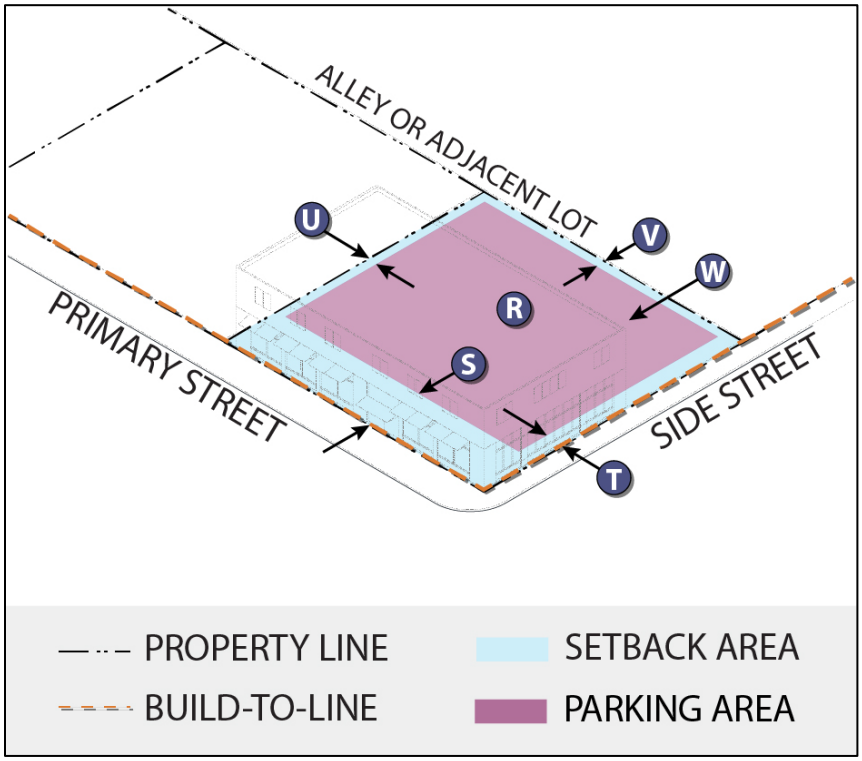
v. Minimum overhang of six (6') feet.

q. Entrances and Access Points.

i. No requirements for shared pedestrian entrances.

F. *Parking and Access*.

1. Figure 20.420.160-4. CBB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

t. Side Setback (Side Street).

i. Minimum of ten (10’) feet from the lot line.

u. Side Setback (Adjacent Lot).

i. Minimum of five (5’) feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5’) feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. *Overlay Requirements*.

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.160-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.160-2. ALLOWABLE FRONTAGE TYPES FOR CBB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	Yes
Common Yard	No
Courtyard	No
Gallery	No
Light Court	Yes
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.170 Big Box Retail Building Type (BRB)

A. *Definition.* A Big Box Retail Building (BRB) is a larger footprint, building that often spans an entire block, designed with a single, controlled entrance to manage high volumes of goods and customer traffic. Entrances should face the street and be easily accessible, with parking situated at the rear or sides to promote walkability and pedestrian-oriented frontage. When satellite buildings are included, it is crucial to include pedestrian safety and landscaping around the site for a cohesive and safe environment. If a permit application has more than one (1) lot, all other lots must meet the requirements of the CBB Building Type. If a lot has more than one (1) primary street, that lot is only required to meet the primary street requirements for one (1) of those primary streets and all other streets may be defined as a side street.

B. *Applicability.* Table 20.420.170-1 and Image 20.420.170-1 identify the allowable zoning district for BRB Building Types. Character images are advisory only.

TABLE 20.420.170-1. BIG BOX RETAIL BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	No
Mixed-Use Neighborhood District (MX)	No
Regional Activity Center District (RA)	Yes
Institutional/Campus District (IC)	Yes
Industrial/Employment District (IE)	Yes
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks/Open Space District (PO)	No
Natural Areas District (NA)	No

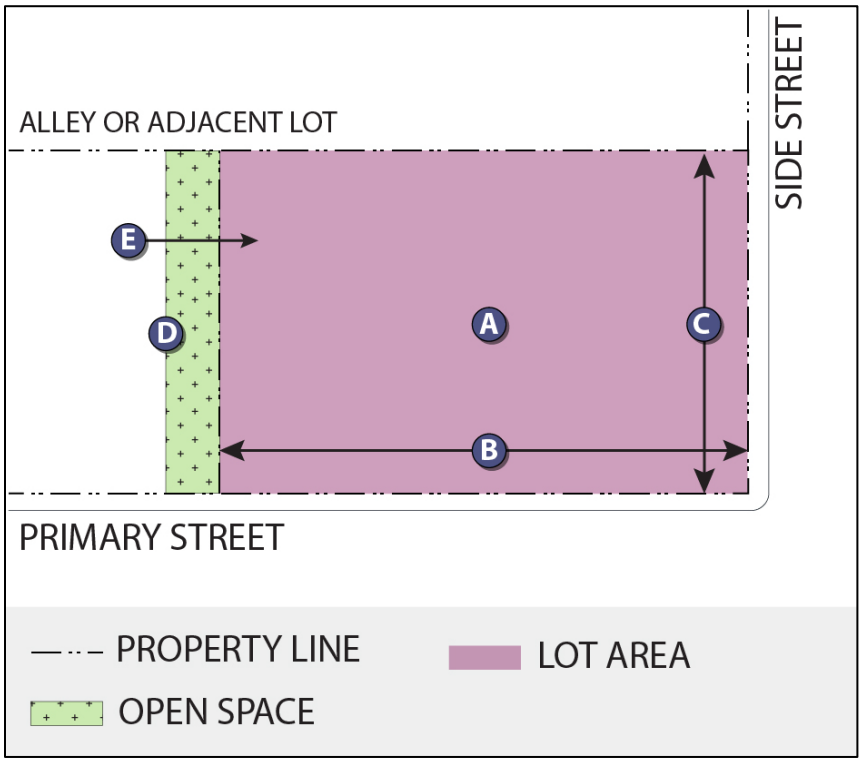
IMAGE 20.420.170-1. BIG BOX RETAIL BUILDING TYPE EXAMPLE



This image is advisory only.

C. *Lot Dimension and Coverage*.

1. Figure 20.420.170-1. BRB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area.

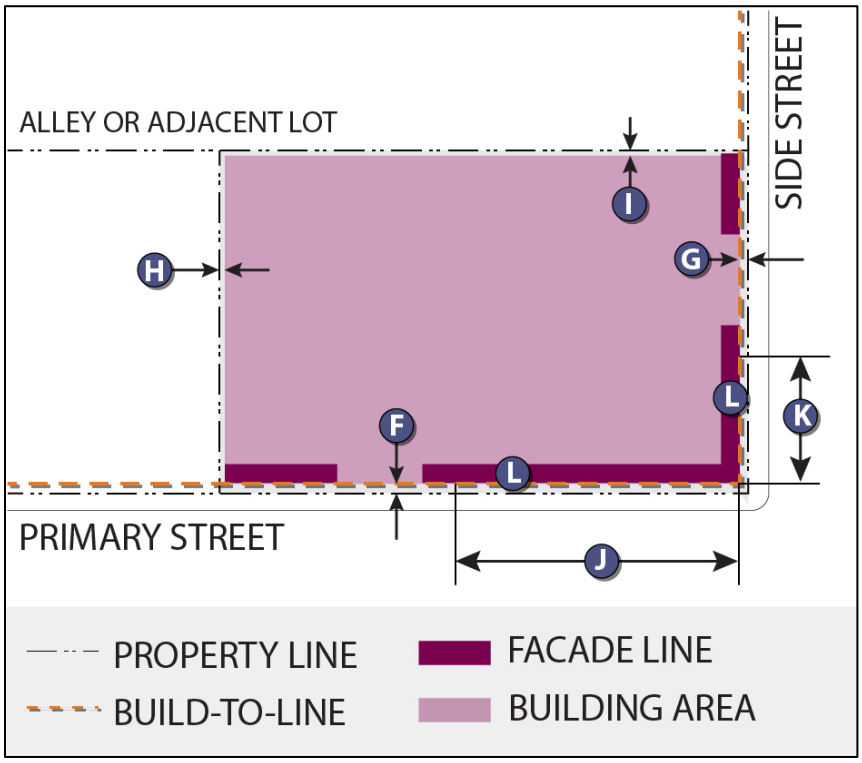
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. *Building Placement and Buildout.*

1. Figure 20.420.170-2. BRB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of ten (10’) feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Maximum of ten (10’) feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5’) feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5’) feet from the lot line.

j. Front Build-Out (Primary Street).

i. Minimum of sixty (60%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

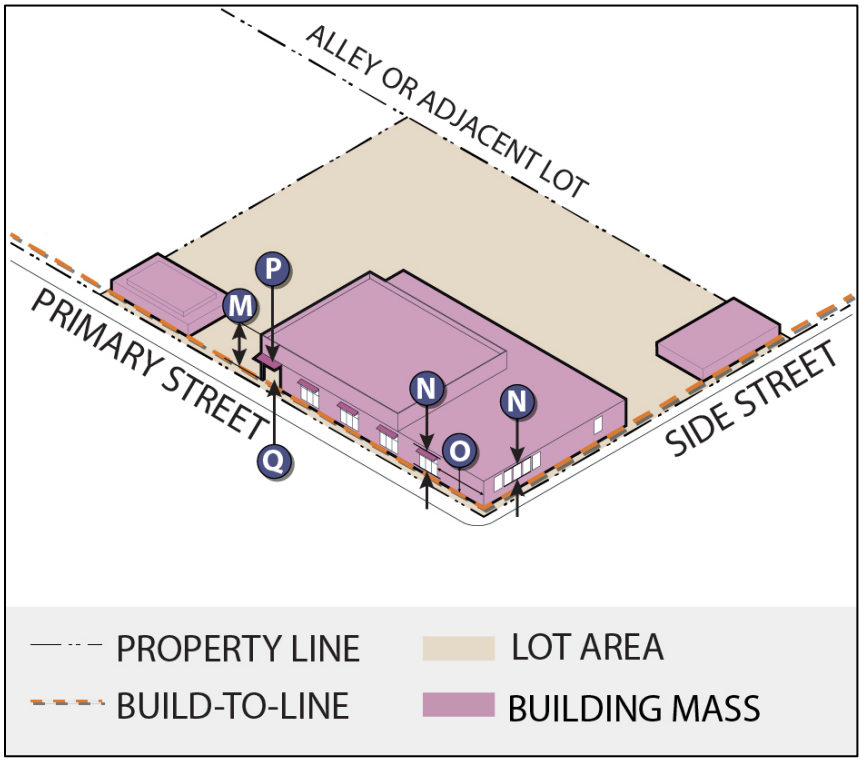
i. Minimum of thirty (30%) percent of the side build-to-line.

l. Maximum Facade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

E. *Building Height and Frontage.*

1. Figure 20.420.170-3. BRB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of forty (40%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than fifty (50') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum of fifty (50%) percent linear coverage on primary streets.

iii. Minimum vertical clearance of ten (10') feet.

iv. Maximum vertical clearance of twenty (20') feet.

v. Minimum overhang of six (6') feet.

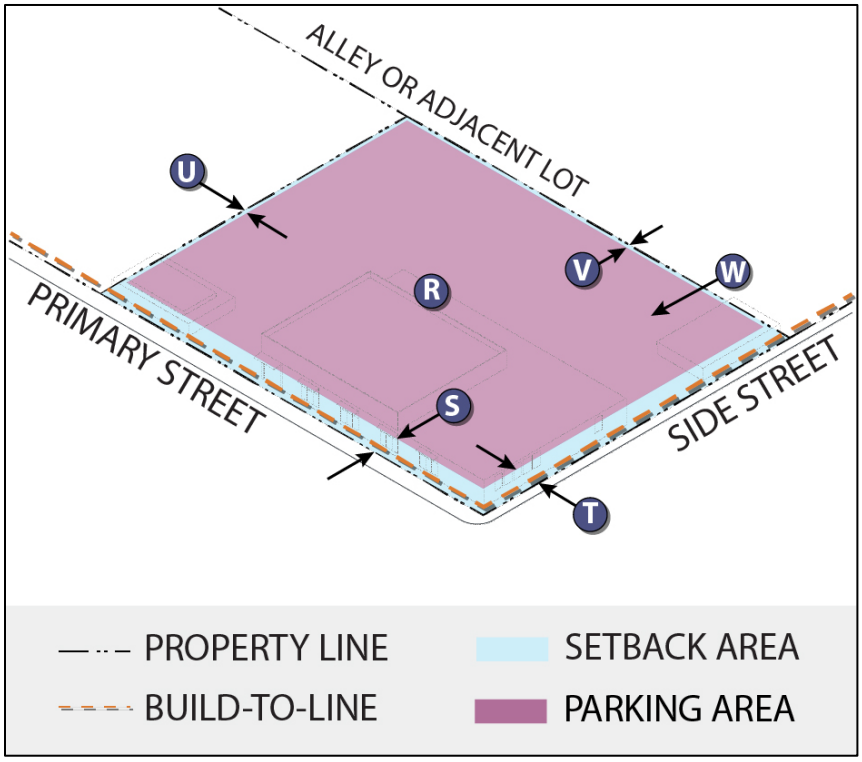
q. Entrances and Access Points.

i. No requirements for shared pedestrian entrances.

ii. Pedestrian entrances on additional buildings on other lots must meet the entrances and access points requirements for BRB.

F. *Parking and Access*.

1. Figure 20.420.170-4. BRB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements.

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

t. Side Setback (Side Street).

i. Minimum of five (5') feet from the lot line.

u. Side Setback (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

ii. Note: Any BRB Building located within the RA industrial and IE districts must utilize a Structured Parking Garage (SPB) Building Type. Surface parking is allowed with a BBR Building in all other zoning districts.

G. *Overlay Requirements*.

1. Ground Floor Activation. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.170-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.170-2. ALLOWABLE FRONTAGE TYPES FOR BRB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	Yes
Common Yard	No
Courtyard	No
Gallery	No
Light Court	No
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

2. Ground Floor Ready. Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

3. Transit-based Height Allowance. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

a. Increased Maximum Height.

i. No maximum.

4. Other Overlay Requirements. The following may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.180 Flexible Use Building Type (FUB)

A. *Definition*. A Flexible-Use Building (FUB) is a larger footprint, rectangular building designed to accommodate diverse uses such as office, innovation, medical, research, and light manufacturing. When upper floors are included, access is through a shared ground-floor entrance, with interior circulation tailored to the number of tenants and specific layout. Parking and loading docks should be located at the rear or along an alley to maintain a clean streetscape. Side setbacks are ideal for creating outdoor areas and shared spaces that enhance the ground-floor facilities.

B. *Applicability*. Table 20.420.180-1 and Image 20.420.180-1 identify the allowable zoning district for BRB Building Types. Character images are advisory only.

TABLE 20.420.180-1. FLEXIBLE USE BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional / Campus District (IC)	Yes
Industrial / Employment District (IE)	Yes
Heavy Industrial District (HI)	Yes
Manufactured Home Development District (MH)	No
Parks / Open Space District (PO)	No
Natural Areas District (NA)	No

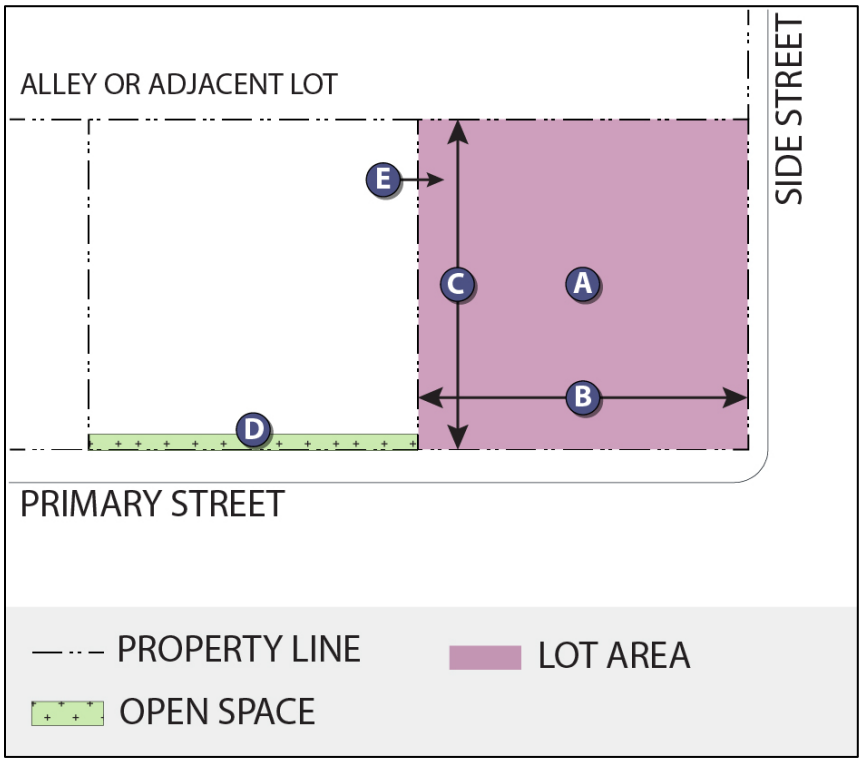
IMAGE 20.420.180-1. FLEXIBLE USE BUILDING TYPE EXAMPLE



This image is advisory only.

C. Lot Dimension and Coverage.

1. Figure 20.420.180-1. FUB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area

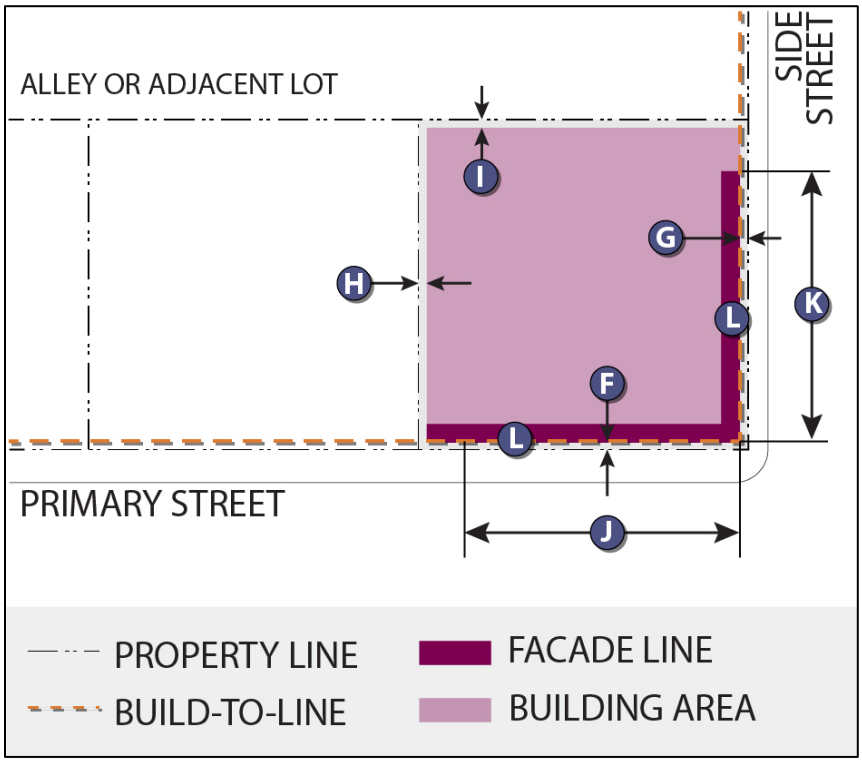
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. Building Placement and Buildout.

1. Figure 20.420.180-2. FUB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Five (5') to twenty (20') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Maximum of ten (10') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

j. Front Build-Out (Primary Street).

i. Minimum of sixty (60%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

i. Minimum of fifty (50%) percent of the side build-to-line.

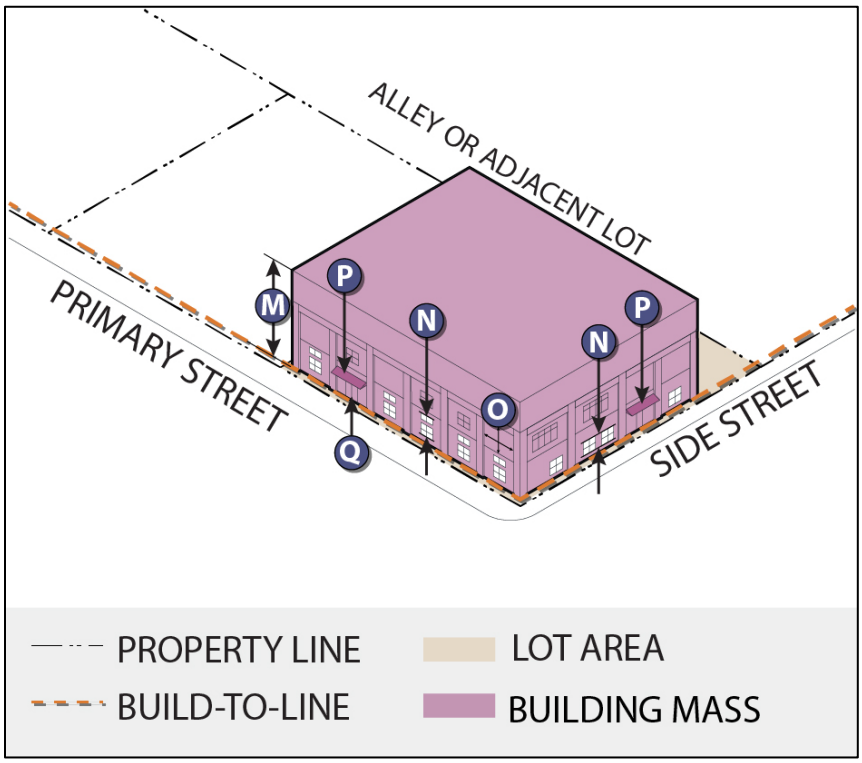
l. Maximum Façade Length.

i. Maximum two-hundred (200') feet without a building break; unrestricted public, pedestrian access; facade modulation; or change in materials or color.

ii. Note: Building Placement and Buildout Standards are not applicable on building types located within the IC, IE, and HI Districts.

E. Building Height and Frontage.

1. Figure 20.420.180-3. FUB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of fifty (50%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than fifty (50') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum of forty (40%) percent linear coverage on primary streets.

iii. Minimum vertical clearance of ten (10') feet.

iv. Maximum vertical clearance of twenty (20') feet.

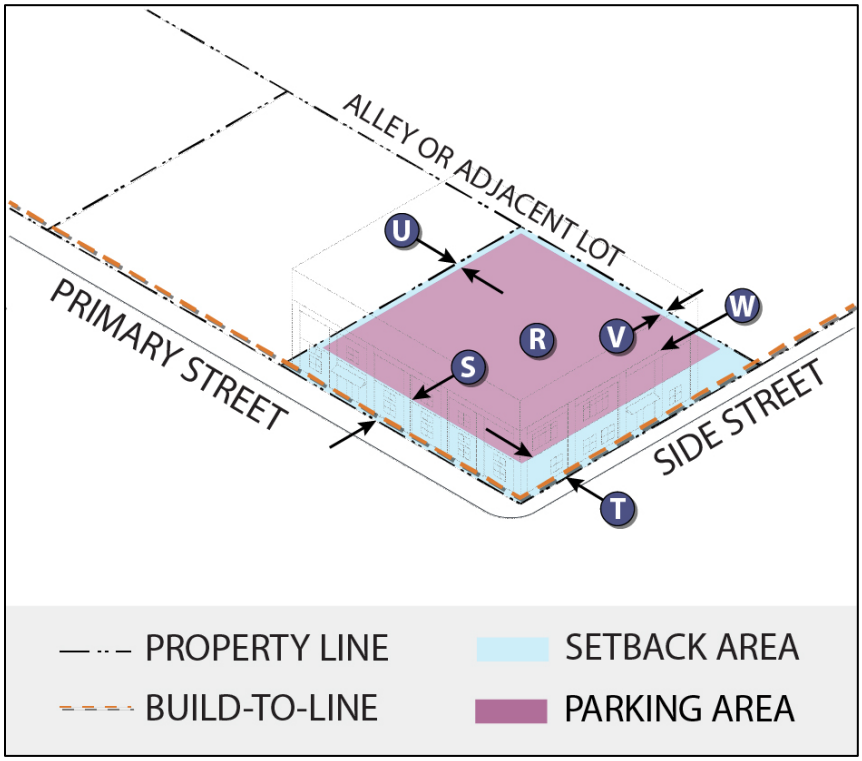
v. Minimum overhang of six (6') feet.

q. Entrances and Access Points.

i. No requirements for shared pedestrian entrances.

F. Parking and Access.

1. Figure 20.420.180-4. FUB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

t. Side Setback (Side Street).

i. Minimum of twenty (20’) feet from the lot line.

u. Side Setback (Adjacent Lot)

i. Minimum of five (5’) feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5’) feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. Overlay Requirements.

1. *Ground Floor Activation.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.180-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.180-2. ALLOWABLE FRONTAGE TYPES FOR FUB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	No
Common Yard	No
Courtyard	No
Gallery	No
Light Court	No
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14’) feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

2. *Ground Floor Ready.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12’) feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

3. Transit-based Height Allowance.

a. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

b. Increased Maximum Height.

i. No maximum.

4. *Other Overlay Requirements*. The following regulations may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.190 Industrial/Distribution Building Type (IDB).

A. *Definition*. An Industrial / Distribution Building (IDB) is a large standalone building, typical of business parks or commercial corridors, often featuring setbacks and green space. The entrance is strategically located based on local circulation patterns, typically near or visible from the main street for ease of access. Vehicular access and loading areas should be positioned along secondary streets or at the rear of the lot to accommodate large trucks and deliveries, ensuring smooth operations for industrial and manufacturing uses while maintaining attractive frontage.

B. *Applicability*. Table 20.420.190-1 and Image 20.420.190-1 identify the allowable zoning district for IDB Building Types. Character images are advisory only.

TABLE 20.420.190-1. INDUSTRIAL/DISTRIBUTION BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	No
Mixed-Use Neighborhood District (MX)	No
Regional Activity Center District (RA)	No
Institutional / Campus District (IC)	Yes
Industrial / Employment District (IE)	Yes
Heavy Industrial District (HI)	Yes
Manufactured Home Development District (MH)	No
Parks / Open Space District (PO)	No
Natural Areas District (NA)	No

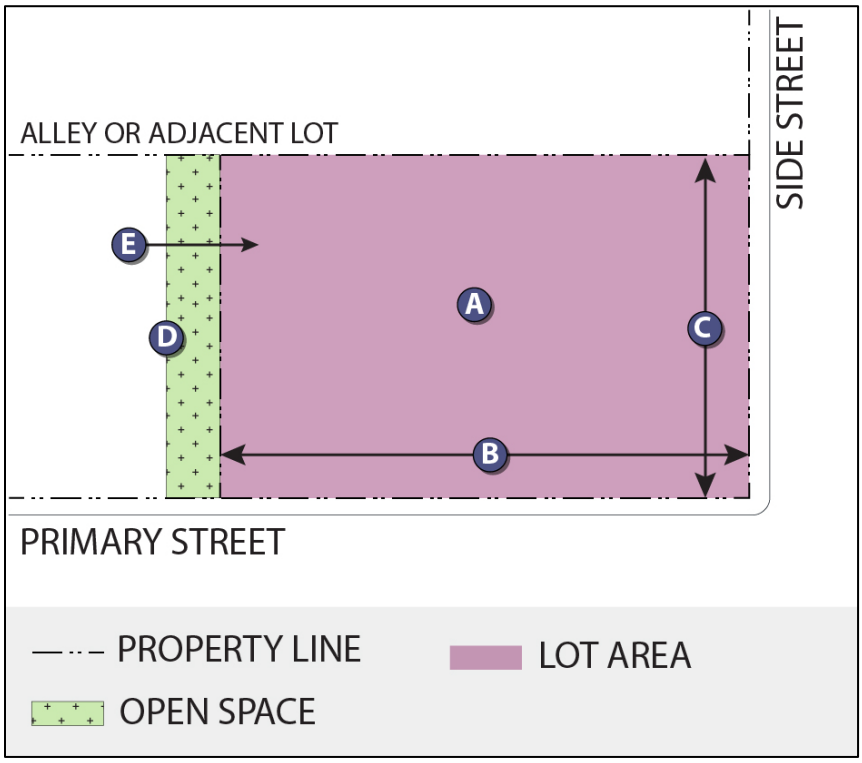
IMAGE 20.420.190-1. INDUSTRIAL/DISTRIBUTION BUILDING TYPE EXAMPLE



This image is advisory only.

C. Lot Dimension and Coverage.

1. Figure 20.420.190-1. IDB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area

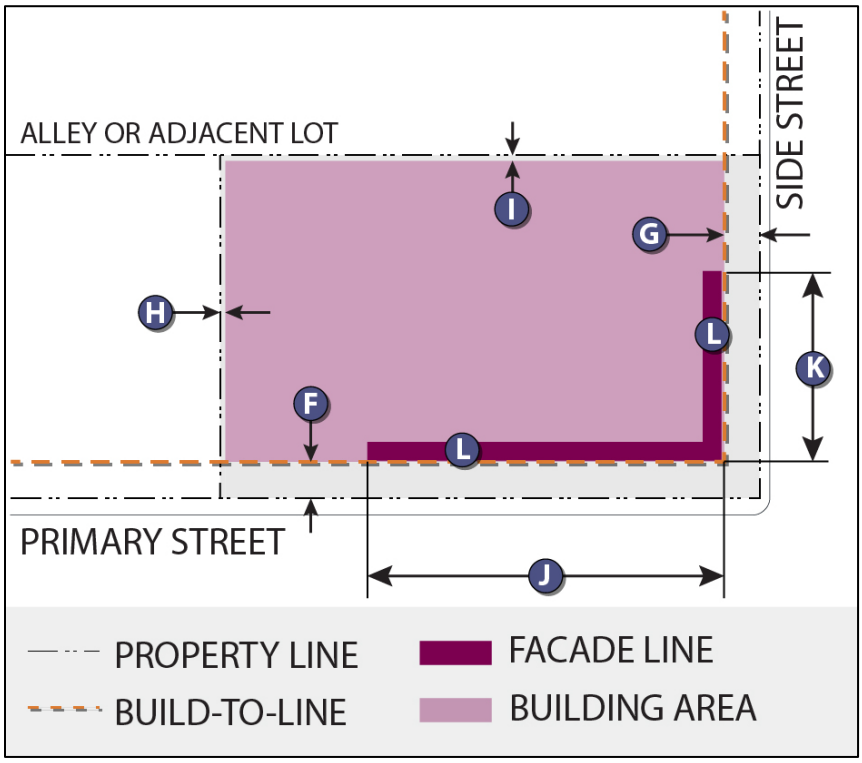
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. Building Placement and Buildout.

1. Figure 20.420.190-2. IDB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Not applicable.

g. Side Build-to-Line (Side Street).

i. Not applicable.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

j. Front Build-Out (Primary Street).

i. Not applicable.

k. Side Build-Out (Side Street).

i. Not applicable.

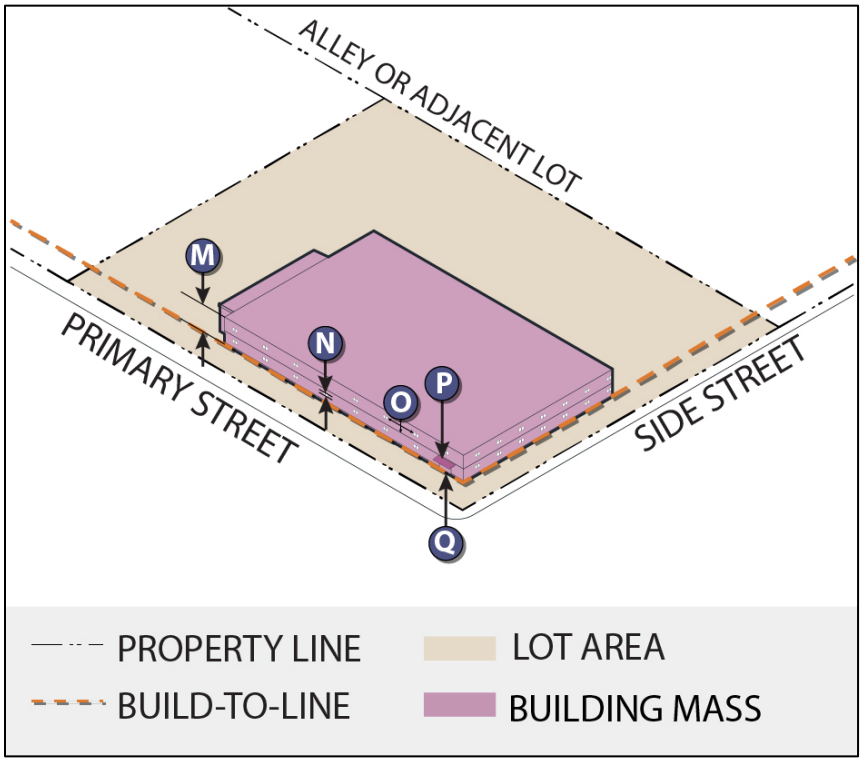
l. Maximum Façade Length.

i. Not applicable.

ii. Note: Building Placement and Buildout Standards are not applicable on building types located within the IC, IE, and HI Districts.

E. Building Height and Frontage.

1. Figure 20.420.190-3. FUB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of ten (10%) percent transparent windows or doors.

ii. Side Street. Minimum of five (5%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than fifty (50') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum vertical clearance of ten (10') feet.

iii. Maximum vertical clearance of twenty (20') feet.

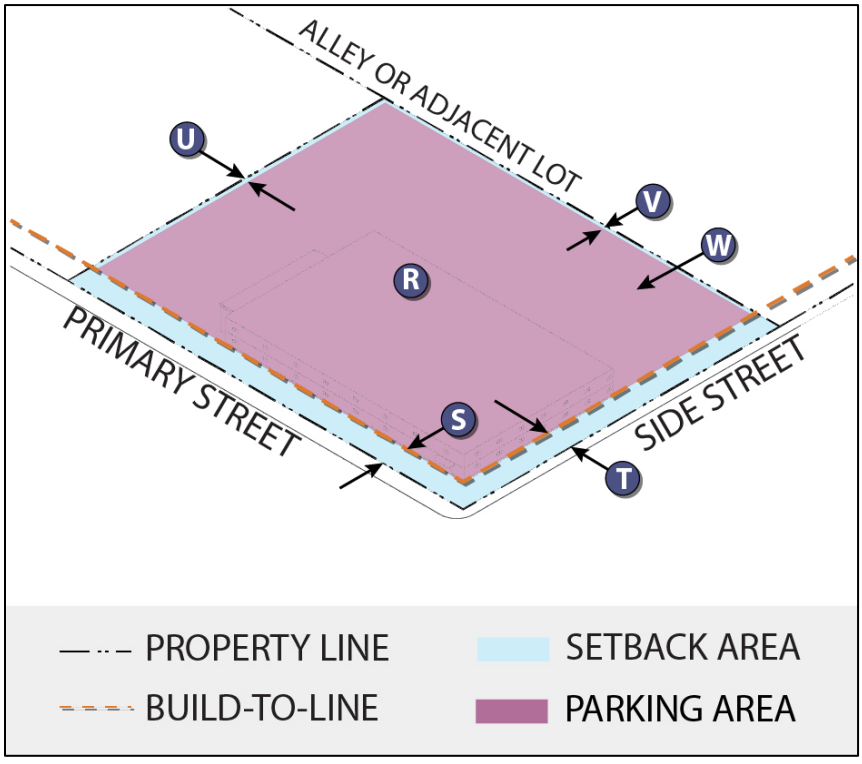
iv. Minimum overhang of six (6') feet.

q. Entrances and Access Points.

i. Not applicable.

F. Parking and Access.

1. Figure 20.420.190-4. IDB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

t. Side Setback (Side Street).

i. Minimum of twenty (20’) feet from the lot line.

u. Side Setback (Adjacent Lot)

i. Minimum of five (5’) feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5’) feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. Overlay Requirements.

1. *Ground Floor Activation.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 20.420.190-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.190-2. ALLOWABLE FRONTAGE TYPES FOR IDB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	No
Common Yard	No
Courtyard	No
Gallery	No
Light Court	No
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Primary Street. Minimum of sixty (60%) percent transparent windows or doors.

ii. Side Street. Minimum of thirty (30%) percent transparent windows or doors.

2. *Ground Floor Ready.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Not applicable.

b. Increased Ground Floor Transparency

i. Not applicable.

3. Transit-based Height Allowance.

a. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

b. Increased Maximum Height.

i. No maximum.

4. *Other Overlay Requirements*. The following regulations may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.200 Structured Parking Garage Building Type (SPB).

A. *Definition*. A Structured Parking Garage Building (SPB) is a neighborhood scale or larger parking garage serving multiple uses or buildings within a city or commercial corridor. These structures can be underground or above ground, and where possible, should incorporate active commercial spaces at the ground level. Design elements should enhance visual interest at the pedestrian scale and mitigate the visual impact of the parking levels above, creating a more attractive and engaging streetscape.

B. *Applicability*. Table 20.420.200-1 and Image 20.420.200-1 identify the allowable zoning district for SPB Building Types.

TABLE 20.420.200-1. STRUCTURED PARKING GARAGE BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	No
Medium-Scale Neighborhood District (MS)	No
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional / Campus District (IC)	Yes
Industrial / Employment District (IE)	Yes
Heavy Industrial District (HI)	Yes
Manufactured Home Development District (MH)	No
Parks / Open Space District (PO)	No
Natural Areas District (NA)	No

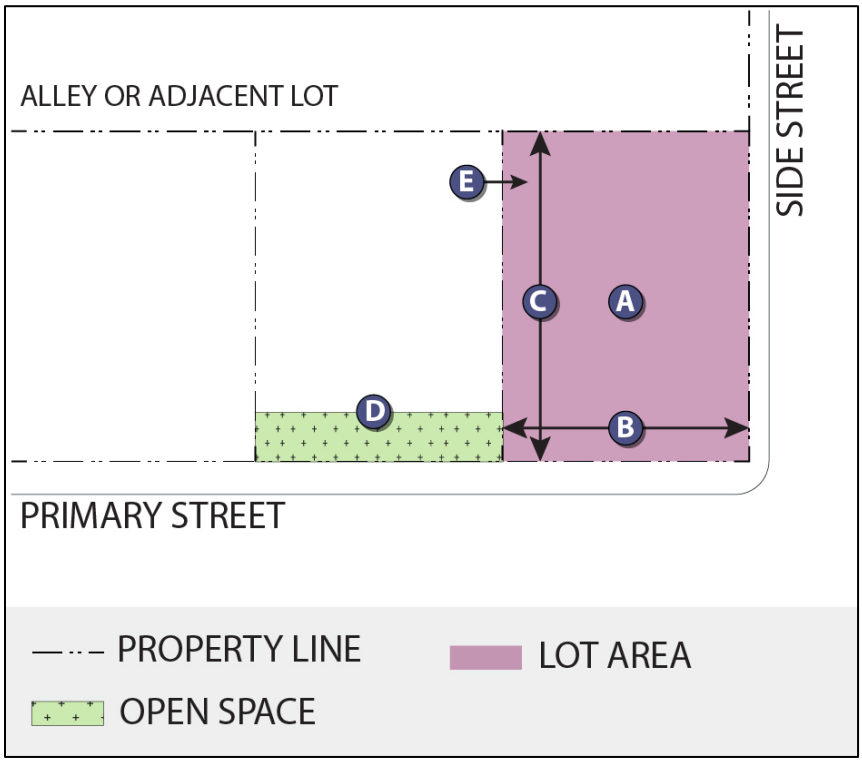
IMAGE 20.420.200-1. STRUCTURED PARKING GARAGE BUILDING TYPE EXAMPLE



This image is advisory only.

C. Lot Dimension and Coverage.

1. Figure 20.420.200-1. SPB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area

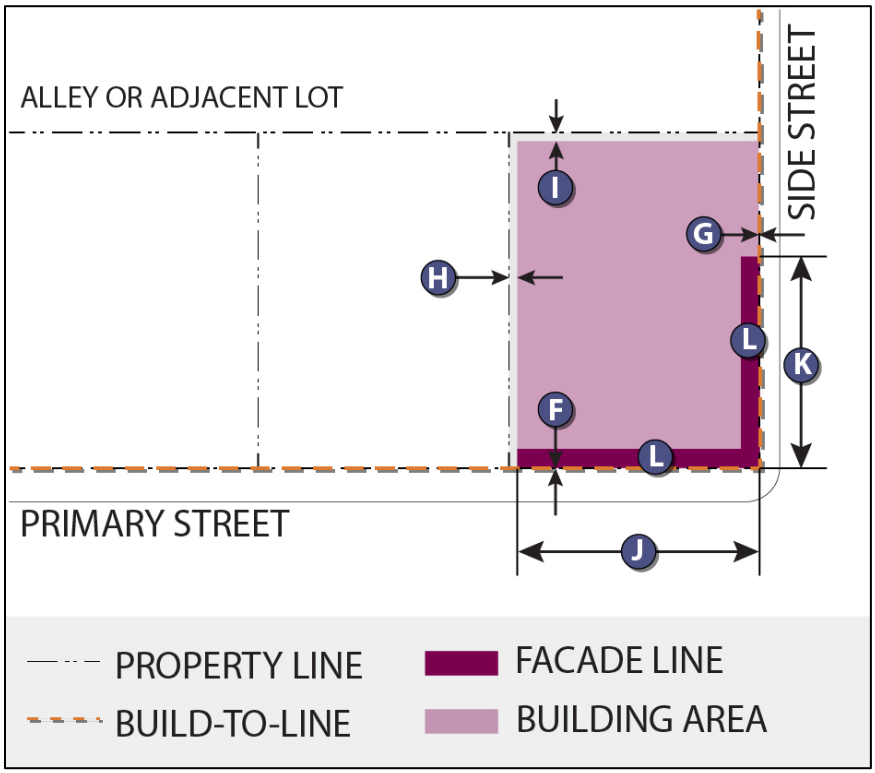
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. Building Placement and Buildout.

1. Figure 20.420.200-2. IDB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of five (5') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Maximum of five (5') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

j. Front Build-Out (Primary Street).

i. Minimum of ninety (90%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

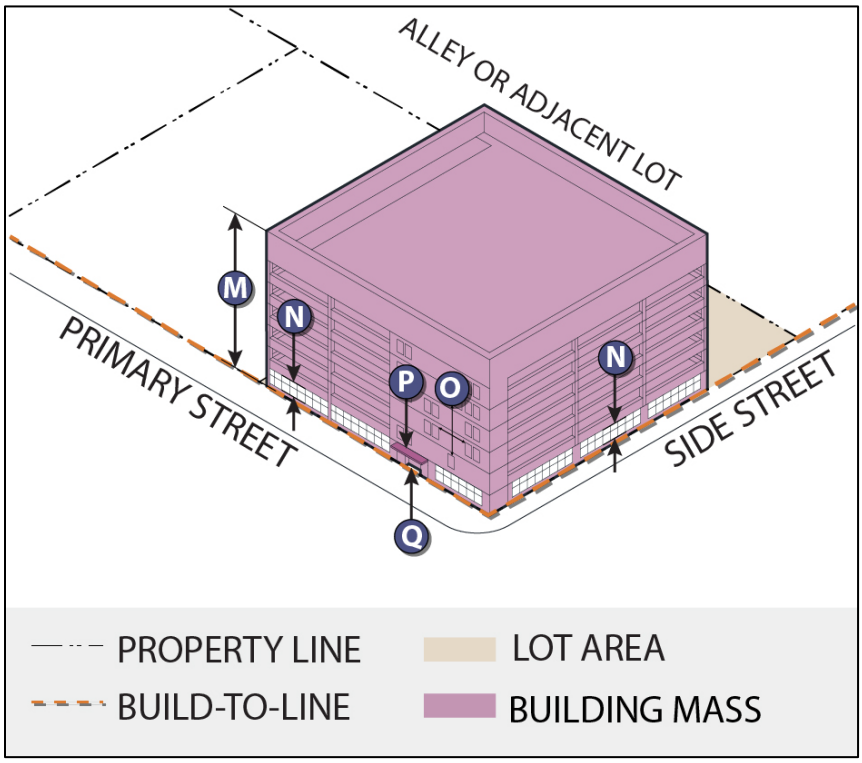
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Façade Length.

i. Not applicable.

E. Building Height and Frontage.

1. Figure 20.420.200-3. SPB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of twenty (20%) percent transparent windows or doors.

ii. Side Street. Minimum of twenty (20%) percent transparent windows or doors.

iii. May exclude those portions of the facades devoted to driveway entrances and exits, stairwells, elevators and centralized payment booths from the calculation.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than fifteen (15') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum of forty (40%) percent linear coverage on primary streets.

iii. Minimum vertical clearance of ten (10') feet.

iv. Maximum vertical clearance of twenty (20') feet.

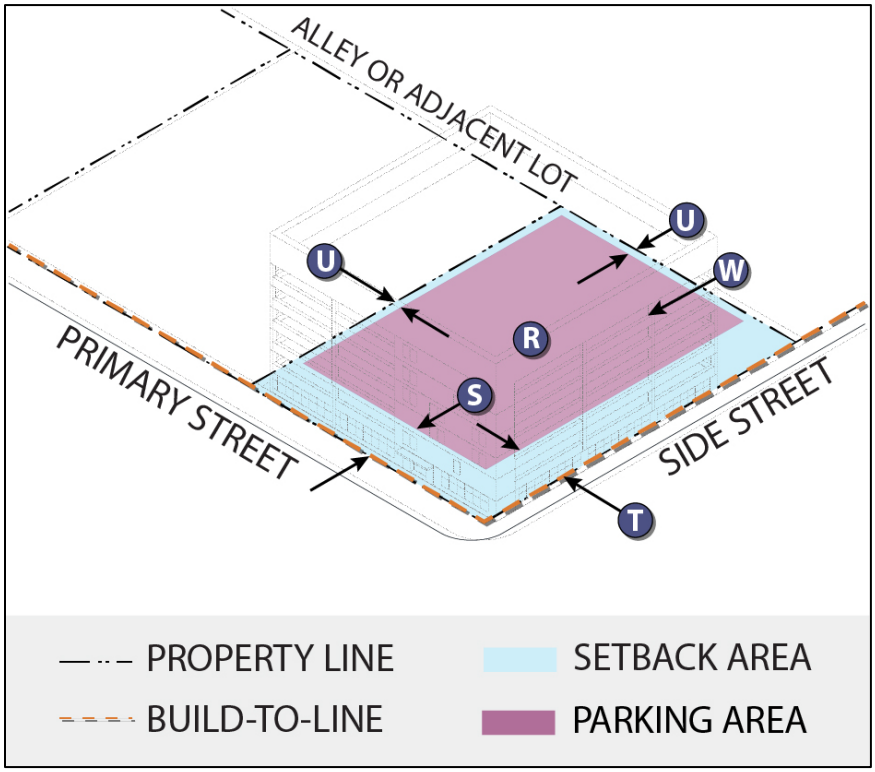
v. Minimum overhang of six (6') feet.

q. Entrances and Access Points.

i. A shared pedestrian entrance must be located facing a primary street. Additional pedestrian entrances may be located facing side streets. If no primary street is present, the pedestrian entrance must face the side street.

F. Parking and Access.

1. Figure 20.420.200-4. SPB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

ii. Parking is allowed within twenty (20') feet provided it is internal to the structure.

t. Side Setback (Side Street).

i. Minimum of twenty (20’) feet from the lot line.

ii. Parking is allowed within twenty (20') feet provided it is internal to the structure.

u. Side Setback (Adjacent Lot)

i. Minimum of five (5’) feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5’) feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. Overlay Requirements.

1. *Ground Floor Activation.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 420.200-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.200-2. ALLOWABLE FRONTAGE TYPES FOR SPB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	Yes
Common Yard	No
Courtyard	No
Gallery	No
Light Court	No
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Minimum of forty (40%) percent windows or doors on all street types.

2. *Ground Floor Ready.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency

i. Minimum of forty (40%) percent windows or doors on all street types.

3. Transit-based Height Allowance.

a. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

b. Increased Maximum Height.

i. No maximum.

4. *Other Overlay Requirements*. The following regulations may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

20.420.210 Civic/Institutional Building Type (CIB).

A. *Definition*. A Civic / Institutional Building (CIB) is a standalone building designed to accommodate various uses such as arts, culture, education, recreation, transportation, government, and public assembly. These buildings can have multiple floors with flexible design requirements to suit diverse functions. The main entrance should be easily accessible from the primary street, with parking located at the rear. Outdoor spaces, such as courtyards, plazas, or parks, are typically provided either in front of the building or within an accessible courtyard, enhancing public engagement and gathering opportunities.

B. *Applicability*. Table 20.420.210-1 and Image 20.420.210-1 identify the allowable zoning district for CIB Building Types.

TABLE 20.420.210-1. CIVIC/INSTITUTIONAL BUILDING TYPE ALLOWABLE BY DISTRICT

Low-Scale Neighborhood District (LS)	Yes
Medium-Scale Neighborhood District (MS)	Yes
Mixed-Use Neighborhood District (MX)	Yes
Regional Activity Center District (RA)	Yes
Institutional / Campus District (IC)	Yes
Industrial / Employment District (IE)	Yes
Heavy Industrial District (HI)	No
Manufactured Home Development District (MH)	No
Parks / Open Space District (PO)	Yes
Natural Areas District (NA)	No

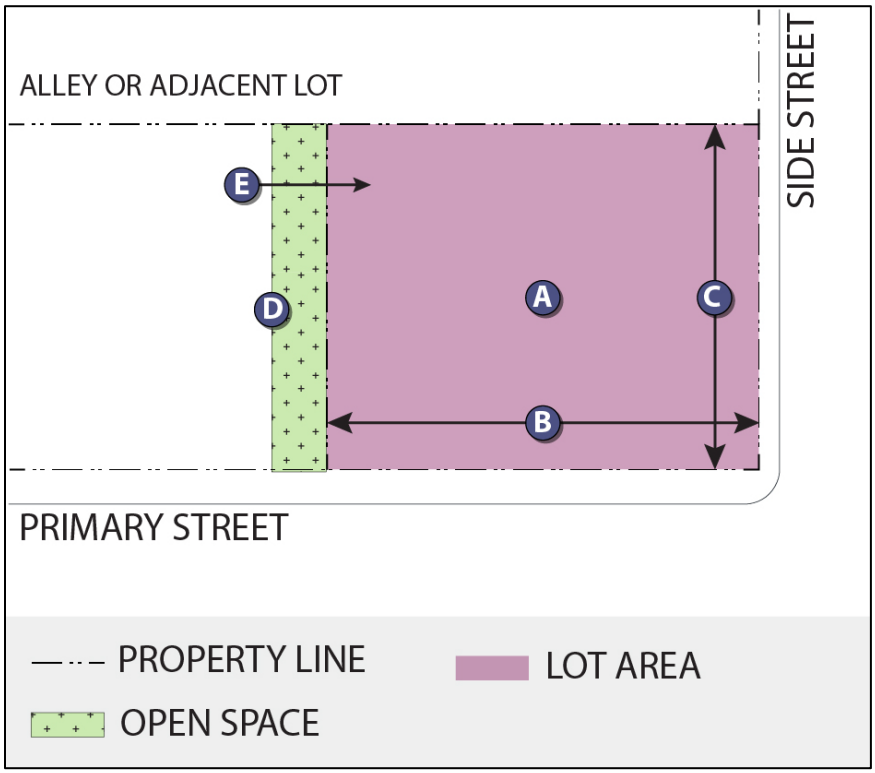
IMAGE 20.420.210-1. CIVIC/INSTITUTIONAL BUILDING TYPE EXAMPLE



This image is advisory only.

C. Lot Dimension and Coverage.

1. Figure 20.420.210-1. CIB Lot Dimension and Coverage



a. Minimum and Maximum Lot Size.

i. Minimum: Not applicable.

ii. Maximum: Not applicable.

b. Maximum Lot Width.

i. Not applicable.

c. Maximum Lot Depth.

i. Not applicable.

d. Minimum Open Space Area

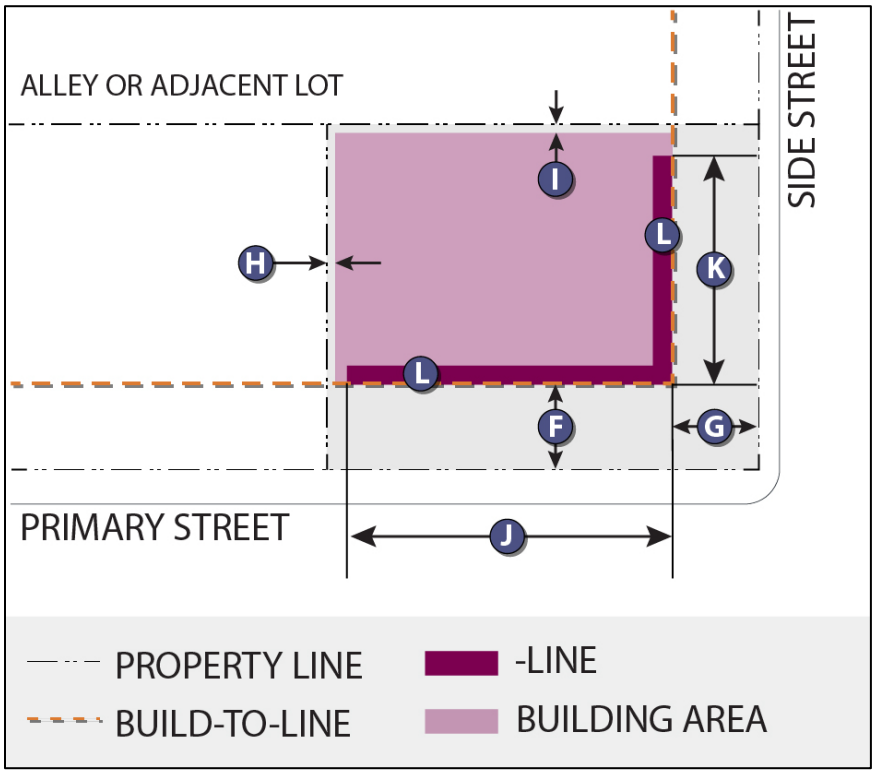
i. Not applicable.

e. Maximum Impervious Area.

i. Not applicable.

D. Building Placement and Buildout.

1. Figure 20.420.210-2. CIB Building Placement and Buildout



f. Front Build-to-Line (Primary Street).

i. Maximum of fifty (50') feet from the lot line.

g. Side Build-to-Line (Side Street).

i. Maximum of five (5') feet from the lot line.

h. Side Setback Line (Adjacent Lot).

i. Minimum of five (5') feet from the lot line.

i. Rear Setback Line (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

j. Front Build-Out (Primary Street).

i. Minimum of fifty (50%) percent of the front build-to-line.

k. Side Build-Out (Side Street).

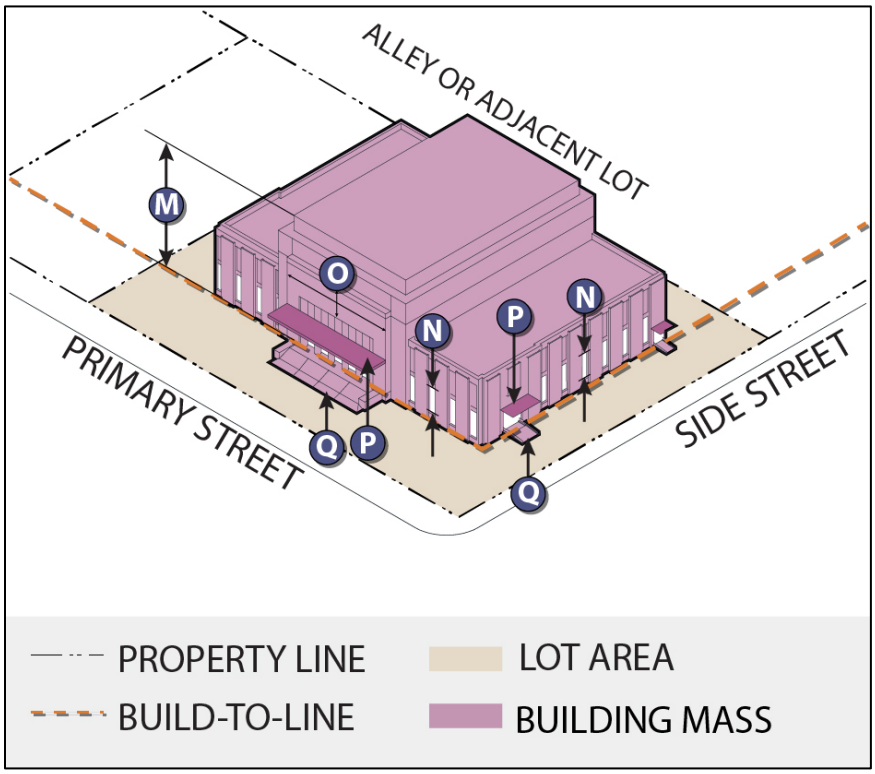
i. Minimum of fifty (50%) percent of the side build-to-line.

l. Maximum Façade Length.

i. Not applicable.

E. Building Height and Frontage.

1. Figure 20.420.210-3. CIB Building Height and Frontage



m. Minimum and Maximum Height.

i. See Chapter 20.410 Zoning Districts height range for minimum and maximum height.

n. Ground Floor Transparency.

i. Primary Street. Minimum of forty (40%) percent transparent windows or doors.

ii. Side Street. Minimum of forty (40%) percent transparent windows or doors.

o. Blank Wall Limitations (Any Public Street).

i. No blank frontage walls greater than thirty (30') feet.

p. Weather Protection.

i. Required at all primary and side street entrances only when building facade is located at the lot line.

ii. Minimum of forty (40%) percent linear coverage on primary streets.

iii. Minimum vertical clearance of ten (10') feet.

iv. Maximum vertical clearance of twenty (20') feet.

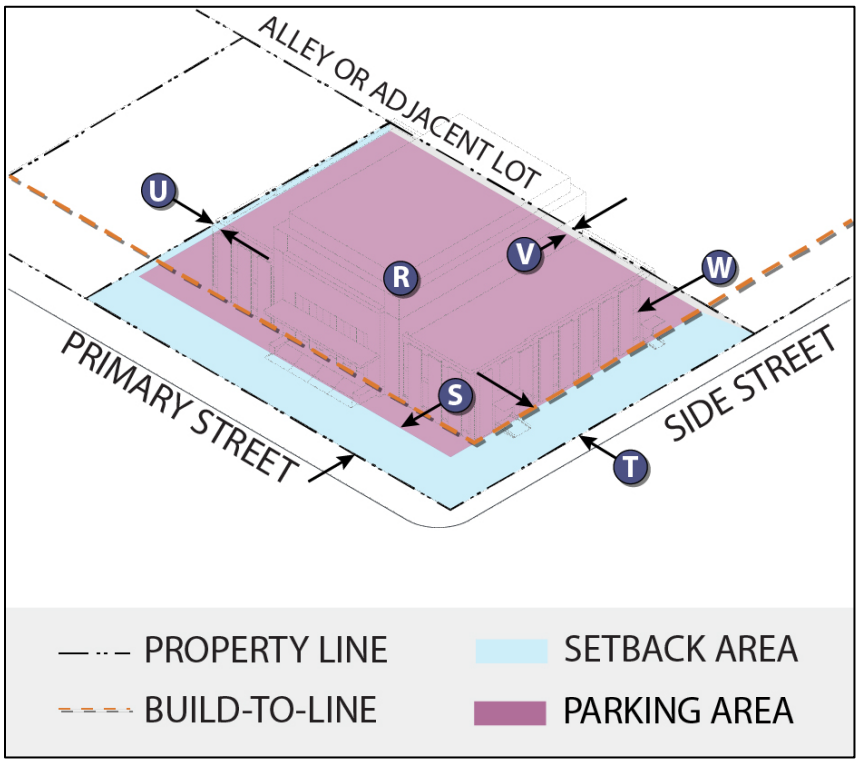
v. Minimum overhang of six (6') feet.

q. Entrances and Access Points.

i. Not applicable.

F. Parking and Access

1. Figure 20.420.210-4. CIB Parking and Access



r. Parking Ratios.

i. See Section 20.450.045 VMC Parking and Loading Revised for parking requirements

s. Front Setback (Primary Street).

i. Minimum of twenty (20') feet from the lot line.

t. Side Setback (Side Street).

i. Minimum of twenty (20') feet from the lot line.

u. Side Setback (Adjacent Lot)

i. Minimum of five (5') feet from the lot line.

v. Rear Setback (Adjacent Lot or Alley).

i. Minimum of five (5') feet from the lot line.

w. Access Points.

i. Parking shall be accessed by way of a side street or an alley abutting the lot. If neither are present, parking may be accessed by way of a primary street. See Title 11 Streets and Sidewalks for additional requirements.

G. Overlay Requirements.

1. *Ground Floor Activation.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.510 Active Ground Floor Use Overlay shall be required to comply with the following requirements:

a. Required Frontage Type. Table 420.210-2 shows the allowable frontage types for this building type that apply to frontage on primary and side streets. Internal frontage is not regulated. See Chapter 20.440 Frontage Types of this code for additional frontage type requirements.

TABLE 20.420.210-2. ALLOWABLE FRONTAGE TYPES FOR CIB

Frontage Type	Allowable
Awnings	Yes
Balconies	No
Bay Windows	No
Cafe	Yes
Common Yard	No
Courtyard	No
Gallery	No
Light Court	No
Porch	No
Stoop	No
Shopfront	Yes

b. Frontage Modulation Requirements.

   i. One (1) vertical modulation of minimum twelve (12”) inches every fifty (50’) feet of facade on all streets.

c. Ground Floor Use Activation.

   i. Fifty (50%) percent of ground floor frontage along primary streets must be Active Retail Uses per Chapter VMC 20.430 Use Requirements; or the side street when no primary street is present.

d. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of fourteen (14') feet (floor-to-ceiling) for all primary uses.

e. Increased Ground Floor Transparency.

i. Minimum of sixty (60%) percent windows or doors on all street types.

2. *Ground Floor Ready.* Pursuant to this Chapter, any building type located within a zoning district subject to Chapter 20.520 Active Ground Floor Use Ready Overlay shall be required to comply with the following requirements:

a. Minimum Ground Floor-to-Ceiling Height.

i. Minimum of twelve (12') feet (floor-to-ceiling) for all primary uses.

b. Increased Ground Floor Transparency

i. Minimum of sixty (60%) percent windows or doors on all street types.

3. Transit-based Height Allowance.

a. Pursuant to this Chapter and Washington State Law, any building type located within a 1/4-mile radius of an existing or planned bus rapid or light rail transit, are eligible for no maximum height limits, subject to the Chapter 20.530 Station Areas Overlay.

b. Increased Maximum Height.

i. No maximum.

4. *Other Overlay Requirements*. The following regulations may also apply:

a. See Chapter 20.500 VMC Overlay Districts of this code for other requirements that may apply to this district.

b. See Chapter 20.600 VMC Subarea Plans of this code for other requirements that may apply to this district.

c. See Chapter 20.700 VMC Environmental Regulations of this code for other requirements that may apply to this district.

THE VANCOUVER MUNICIPAL CODE IS CURRENT THROUGH UPDATE, PASSED UPDATE.

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CITY WEBSITE: www.cityofvancouver.us

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CHAPTER 20.430
USE REQUIREMENTS

Sections:

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20.430.010 Purpose.

A. The purpose of this Chapter is to introduce eight (8) primary use types regulated by the zoning district. Each primary use on a lot is classified as permitted, conditional, or prohibited, as outlined in Tables 20.430.040-1 through 20.430.040-8, and may be subject to specific standards. This chapter also outlines accessory and temporary uses, which may either support a primary use or exist independently on a lot, depending on the specific type of use.

20.410.020 Applicability.

A. This chapter shall be applicable to all permit applications on any lot or lots. Primary uses included in this chapter are subject to Chapter 20.280 VMC Site Plan Review, as applicable per standards or submittal requirements.

20.410.030 Establishment of Use Requirements.

A. This chapter includes the following Use requirements:

1. Primary Use Types and Standards.
2. Accessory Use Types and Standards.
3. Accessory Structures.
4. Temporary Use Types and Standards.

20.410.040 Primary Use Types by District.

A. The primary use is defined as the principal or main activity conducted on a lot, which is the primary purpose for which the property is used. A primary use must comply with all applicable use permissions, standards, and zoning district requirements. All other uses on the lot, such as accessory or temporary uses, must be subordinate and clearly incidental to the designated primary use. The primary use types include the following:

1. Residential Uses (RES).
2. Civic/Institutional Uses (CIN).
3. Active Retail Uses (ACR).
4. Passive Retail Uses (PAR).
5. Office Uses (OFF).
6. Industrial Uses (IND).
7. Infrastructure Uses (INF).
8. Open Space Uses (OPN).

Residential Uses

A. *Definition.* Residential uses include facilities and spaces intended for long-term habitation by individuals or households and may include a range of housing types and densities, from single-family homes to multi-family developments intended to support a mix of lifestyles and household needs.

B. *Applicability.* Residential uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-1.

TABLE 20.430.050-1. RESIDENTIAL USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Residential uses.												
1. Group living	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**X**	**X**	**Yes**	**Not Applicable.**
2. Household living	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**P**	**X**	**X**	**Yes**	**Not Applicable.**
3. Short-term rentals	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**X**	**X**	**Yes**	**Yes**
4. Temporary shelter/housing (i.e., safe stays, transitional housing)	**P**	**P**	**P**	**P**	**P**	**C**	**X**	**C**	**X**	**X**	**Yes**	**Not Applicable.**

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Civic/Institutional Uses

A. *Definition.* Civic/institutional uses include governmental, medical, educational, cultural, or religious functions. These uses are typically accessible to the public and contribute to the social and cultural infrastructure of the community.

B. *Applicability.* Civic/institutional uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-2.

TABLE 20.430.050-2. CIVIC/INSTITUTIONAL USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Civic/institutional uses.												
1. Ambulance services	X	X	C	P	P	P	X	X	X	X	**Not Applicable.**	**Not Applicable.**
2. Community centers	C	C	P	P	P	P	X	X	P	X	**Not Applicable.**	**Not Applicable.**
3. Cultural centers	P	P	P	P	P	P	X	X	P	X	**Not Applicable.**	**Not Applicable.**
4. Colleges	P	P	P	P	P	C	C	X	X	X	**Yes**	**Not Applicable.**
5. Community recreation	P	P	P	P	P	P	X	X	P	X	**Yes**	**Not Applicable.**
6. Day care (child care centers and institutional adult day care)	P	P	P	P	P	P	X	X	X	X	**Yes**	**Yes**
7. Detention and post-detention facilities	X	X	X	C	X	C	C	X	X	X	**Not Applicable.**	**Not Applicable.**
8. Emergency services (except ambulance)	P	P	P	P	P	P	X	X	X	X	**yes**	**Not Applicable.**
9. Medical centers	C	C	P	P	P	P	X	X	X	X	**Not Applicable.**	**Not Applicable.**
10. Religious institutions	P	P	P	P	P	P	X	X	X	X	**Yes**	**Yes**
11. Schools (public and private)	P	P	P	P	P	P	X	X	X	X	**Yes**	**Yes**
12. Social/fraternal and clubs/lodges	P	P	P	P	P	P	X	X	X	X	**Not Applicable.**	**Not Applicable.**

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Active Retail Uses

A. *Definition.* Active retail uses include facilities and spaces dedicated to the sale of goods, merchandise, or services directly to consumers. These uses are typically located on ground floors in pedestrian-oriented areas and are designed to generate foot traffic and contribute to the economic vitality and vibrancy of the streetscape.

B. *Applicability.* Active Retail uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-3.

TABLE 20.430.050-3. ACTIVE RETAIL USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Active retail uses.												
1. Artisan and specialty goods production	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**X**	**Yes**	**Not Applicable.**
2. Eating and drinking establishments	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Not Applicable.**
3. Personal Services	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**
4. Repair-oriented	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**
5. Sales-oriented	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Yes**

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Passive Retail Uses

A. *Definition.* Passive retail uses include spaces that complement active retail uses. Secondary retail is not intended to act as the primary drivers of foot traffic or economic activity in an area. These uses often provide support or specialized goods and services that enhance the overall retail environment.

B. *Applicability.* Passive Retail uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-4.

TABLE 20.430.050-4. PASSIVE RETAIL USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Passive retail uses.												
1. Animal kennel/shelters	X	X	C	C	C	P	P	X	X	X	Yes	Not Applicable.
2. Adult entertainment	X	X	X	X	X	C	C	X	X	X	Yes	Not Applicable.
3. Auto salvage/repair	X	X	X	X	X	P	P	X	X	X	Not Applicable.	Not Applicable.
4. Bulk sales	X	X	X	X	X	P	P	X	X	X	Not Applicable.	Not Applicable.
5. Commercial and transient lodging (i.e., hotels, etc.)	C	C	P	P	P	P	X	C	X	X	Yes	Yes
6. Dog day care	C	P	P	P	P	P	P	X	X	X	Yes	Not Applicable.
7. Electric vehicle (EV) battery exchange station	X	X	X	X	P	P	P	X	X	X	Not Applicable.	Not Applicable.
8. Electric vehicle (EV) charging station (stand-alone)	P	P	P	P	P	P	P	X	X	X	Not Applicable.	Not Applicable.
9. Indoor entertainment	X	X	P	P	P	P	X	X	X	X	Yes	Yes
10. Major event entertainment	X	X	X	C	C	X	X	X	X	X	Not Applicable.	Yes
11. Motor vehicle sales/rental	X	X	C	X	X	P	X	X	X	X	Yes	Not Applicable.
12. Motor vehicle servicing/repair	X	X	X	X	P	P	P	X	X	X	Yes	Not Applicable.
13. Outdoor sales	X	X	X	X	P	P	P	X	X	X	Yes	Not Applicable.
14. Self-service storage	X	X	P	P		P	X	X	X	X	Yes	Yes
15. Vehicle fuel sales (i.e., gas stations)	X	X	X	X	P	P	P	X	X	X	Yes	Not Applicable.

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Office Uses

A. *Definition.* Office uses include spaces used for professional, administrative, business, or clerical activities, typically conducted indoors with minimal environmental or external impacts on surrounding areas.

B. *Applicability.* Office uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-5.

TABLE 20.430.050-5. OFFICE USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Office uses.												
1. Extended office	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**
2. General office	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Not Applicable.**
3. Medical office	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Industrial Uses

A. *Definition.* Industrial uses include production, manufacturing, processing, warehousing, distribution, or repair of goods, as well as related research and development. These uses are typically characterized by operations that may generate higher levels of noise, emissions, truck traffic, or other external impacts.

B. *Applicability.* Industrial uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-6.

TABLE 20.430.050-6. INDUSTRIAL USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Industrial uses.												
1. Bulk fossil fuel storage and handling facility	X	X	X	X	X	X	C	X	X	X	Yes	Yes
2. Cleaner fuels storage and handling facility	X	X	X	X	X	X	C	X	X	X	Yes	Yes
3. Employment Services	X	X	X	X	P	P	P	X	X	X	Not Applicable.	Not Applicable.
4. Energy plants	X	X	C	C	C	C	P	X	X	X	Yes	Not Applicable.
5. Industrial services	X	X	X	X	X	P	P	X	X	X	Not Applicable.	Not Applicable.
6. Manufacturing and production	X	X	P	P	P	P	P	X	X	X	Yes	Yes
7. Organic materials management facilities	C	C	P	P	P	P	P	X	X	X	Not Applicable.	Not Applicable.
8. Recycling facilities	X	X	X	X	X	X	C	X	X	X	Not Applicable.	Not Applicable.
9. Research and development	X	X	P	P	P	P	P	X	X	X	Yes	Yes
10. Small fossil fuel or cleaner fuel storage and distribution facilities	X	X	X	X	X	X	P	X	X	X	Yes	Yes
11. Solid Waste Handling Facilities	X	X	X	X	X	X	P	X	X	X	Yes	Yes
12. Truck stops	X	X	X	X	X	P	P	X	X	X	Yes	Not Applicable.
13. Warehouse/freight movement	X	X	X	X	P	P	P	X	X	X	Yes	Not Applicable.
14. Wholesale sales	X	X	X	X	P	P	X	X	X	X	Yes	Not Applicable.

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Infrastructure Uses

A. *Definition.* Infrastructure uses include facilities and spaces essential for the movement of people and goods, as well as the delivery of critical services across the city. This includes transportation networks, utility systems, rail infrastructure, and communication facilities, all of which support urban functionality, connectivity, and growth.

B. *Applicability.* Infrastructure uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-7.

TABLE 20.430.050-7. INFRASTRUCTURE USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Infrastructure uses.												
1. Airports/airparks	**X**	**X**	**X**	**X**	**X**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Yes**
2. Basic utilities	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**P**	**C**	**Not Applicable.**	**Yes**
3. Data Centers	*Not Allowed in Any Zoning District.*										**Not Applicable.**	**Not Applicable.**
4. Heliports	**X**	**X**	**C**	**C**	**C**	**C**	**X**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**
5. Major utility facilities	**X**	**X**	**C**	**C**	**C**	**C**	**C**	**X**	**P**	**C**	**Not Applicable.**	**Yes**
6. Park and ride facilities	**C**	**C**	**C**	**C**	**P**	**P**	**X**	**X**	**X**	**X**	**Yes**	**Yes**
7. Rail lines/utility corridors	**P**	**P**	**X**	**X**	**P**	**P**	**P**	**X**	**C**	**C**	**Yes**	**Not Applicable.**
8. Railroad yards	**X**	**X**	**X**	**X**	**X**	**X**	**P**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**
9. Structured parking facilities (i.e., parking garages)	**X**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Not Applicable.**
10. Surface parking facilities (i.e., parking lots)	**X**	**C**	**C**	**C**	**C**	**C**	**C**	**X**	**C**	**X**	**Not Applicable.**	**Yes**

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
11. Transportation facilities	**C**	**C**	**C**	**P**	**P**	**P**	**P**	**X**	**C**	**X**	**Not Applicable.**	**Yes**
12. Water-related or water-enjoyment (as defined by VMC 20.760 Shoreline Management)	**X**	**X**	**C**	**C**	**C**	**C**	**C**	**X**	**C**	**X**	**Yes**	**Not Applicable.**
13. Wireless communication facilities	**X**	**X**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Yes**

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

Open Space Uses

A. *Definition.* Open space uses include parks and land preserved or developed for outdoor activities, ecological function, or community interaction. These spaces are regulated by their form, design elements, and relationship to surrounding structures, rather than specific activities alone.

B. *Applicability.* Open Space uses are permitted, conditional, and prohibited as follows, listed in Table 20.430.050-8.

TABLE 20.430.050-8. OPEN SPACE USE REQUIREMENTS BY ZONING DISTRICT

	LS	MS	MX	RA	IC	IE	HI	MH	PO	NA	*Standards*	*Additional Approvals, Policies, or Submittals*
Open space uses.												
1. Agriculture/ horticulture/ silviculture	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**P**	**P**	**Yes**	**Not Applicable.**
2. Cemeteries	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**X**	**X**	**Yes**	**Not Applicable.**
3. Environmental Management and Education	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**P**	**P**	**Not Applicable.**	**Not Applicable.**
4. Fish hatcheries	**X**	**X**	**X**	**X**	**X**	**X**	**P**	**X**	**X**	**X**	**Not Applicable.**	**Not Applicable.**
5. Motorized recreational activities	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**P**	**P**	**Yes**	**Not Applicable.**
6. Parks or Natural Area (urban)	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**P**	**P**	**Not Applicable.**	**Not Applicable.**
7. Parks or Natural Area (regional)	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**X**	**P**	**P**	**Not Applicable.**	**Not Applicable.**
8. Trails	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**Not Applicable.**	**Not Applicable.**

Table Notes: [P]= Permitted Use, [C] = Conditional Use, and [X] = Prohibited

20.430.050 Primary Use Types and Standards

A. Residential Uses

1. Group Living.

a. Standards. The following standards apply:

i. One (1) person shall reside on the site who is responsible for supervising, managing, monitoring and/or providing care, training or treatment of residents.

ii. Residential care homes, state or federally approved, with ; all larger group living uses prohibited in LS, MS, MX, and RA districts.

b. Additional approvals, policies, or submittals. Not applicable.

2. Household Living.

   a. Standards. The following standards apply:

      i. Length of tenancy. Tenancy is longer than thirty (30) calendar days.

      ii. Residential care homes. Residential care homes, state or federally approved, with eight (8) or fewer residents and any required on-site residential staff permitted by right.

   b. Cottage Cluster Dwellings. Must meet the standards in Section VMC 20.450.080.

   c. Manufactured Home Development. Must meet standards in Section VMC 20.450.085.

   d. Additional approvals, policies, or submittals. Not applicable.

3. Short-Term Rental

   a. Standards. The following standards are required for the operation of a short-term rental. Failure to comply with any or all the following development standards will result in the revocation of a short-term rental permit:

      i. Licenses required and permit approval.

         (A). Business license. Short-term rental use is a business that requires the operator to register with the Washington State Department of Revenue and obtain a city of Vancouver business license.

         (B). Operations. Short-term rental operations are regulated through a short-term rental permit application, subject to the development standards listed below. Short-term rental permits are nontransferable business operation permits and do not run with the land. Short-term rental permits automatically expire when property ownership changes.

      ii. Development standards.

         (A). Regulations. A short-term rental must meet all applicable state and local health, safety and building code regulations such as fire and smoke protections, egress and accessibility, and structural design, as well as applicable provisions of the Washington Administrative Code (WAC) and the Revised Code of Washington (RCW).

         (B). Off-Site Impacts. A short-term rental must not generate measurable levels at the property line of dust, smoke, odor, glare, or noise beyond those associated with a residential use. The short-term rental must not generate solid waste in volume or type not normally associated with a residential use.

iii. Limitations.

(A). Legal status. Short-term rentals are only permitted within a legally established dwelling unit. Short-term rentals may not be operated outdoors, in an accessory structure, in a recreational vehicle, or in any other nonresidential structure.

(B). Multifamily tax exemption. Short-term rentals are not permitted in any dwelling unit or building that has received approval under the city's multifamily tax exemption (MFTE) program (Chapter 3.22 VMC, as now existing or hereafter amended). This limitation does not apply after the MFTE program exemption period has ended.

(C). Total rental limitation. To limit the impact of short-term rentals on the available long-term housing supply, the city may issue no more than eight hundred and seventy (870) active short-term rental permits at any given time. Permits will be approved on a first-come, first-served basis.

(D). Liability Insurance. Short-term rental operators must have current, valid liability insurance coverage for any short-term rental unit that complies with the requirements of RCW 64.37.050, as now existing or hereafter amended.

(E). Notification. Prior to the city application process for a short-term rental permit, the property owner must provide a courtesy notice regarding the short-term rental to all property owners abutting or adjacent to the proposed short-term rental location. This notification must include a description of the operation, number of bedrooms to be rented to overnight guests, and contact information for the owner or operator by phone.

iv. Violations.

(A). Unlawful use. It is unlawful to rent, offer for rent, or advertise for rent a dwelling unit located on any property with the city as a short-term rental without a permit and license authorizing such use issued and approved in the manner required by this chapter.

(B). Enforcement. Failure of the property owner or authorized agent or local contact of a short-term rental to meet the standards contained herein is subject to the enforcement provisions contained in Section 22.02.020 VMC.

b. Additional approvals, policies, or submittals. The following apply:

i. Application – Fees. The short-term rental applicant must submit a completed short-term rental permit application form as prescribed by the city's planning official with the applicable fee per Chapter 20.190 VMC.

ii. Required Permit Application Information.

(A). Affidavit. Affidavit of mailing showing proof of mailing of notification to property owners abutting and adjacent to the proposed short-term rental.

(B). Liability insurance. Copy of liability insurance for the short-term rental.

(C). Continual compliance with these standards. Acknowledgment by the property owner attesting that the short-term rental will continuously comply with the required standards in this chapter and allowing the city to inspect the premises in accordance with Chapter 17.08 VMC.

4. Temporary Shelter/Housing (i.e. safe stays, transitional housing).

a. Standards. The following apply:

i. Transitional, PSH, and emergency housing in IE and MH. Transitional housing, permanent supportive housing (PSH), and emergency housing or shelters are allowed in the IE and MH districts per RCW 36.70A, as amended by HB 1220; all other temporary shelter/housing uses are not allowed.

ii. Transitional and emergency housing or shelters on land owned or controlled by a religious organization. Transitional and emergency housing or shelters are allowed in all zones on property owned or controlled by a religious organization per RCW 35.21.915.

b. Additional approvals, policies, or submittals. Not applicable.

B. Civic/Institutional Uses

1. Ambulance Services.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

2. Community centers.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

3. Cultural centers.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

4. Colleges.
    a. Standards. The following apply:
        i. Access Points: The lot shall take primary access for vehicles from no less than a primary street as defined by this code.
        ii. Maximum Lot Size in LS and MS Districts: The site contains no more than twelve (12) acres and not to exceed seventy-five thousand (75,000 GSF) gross square feet.
        iii. Exemption: Schools are not required to meet the Front Build-to-Line and Side Build-to-Line requirements.
    b. Additional approvals, policies, or submittals. Not applicable.
5. Community recreation.
    a. Standards. The following apply:
        i. Incidental uses. There shall be no external evidence of any incidental commercial activities taking place within the building.
    b. Additional approvals, policies, or submittals. Not applicable.
6. Day care (childcare centers and institutional adult day care).
    a. Standards. The following apply:
        i. Family Child Day Care Home.
            (A). Signs. Signs are subject to Home Occupations of this code.
        ii. Child Care Center.
            (A). Signs. Signs are subject to Home Occupations of this code.
        iii. Adult Family Home. An existing adult family home may provide services to up to eight adults upon approval from the department of social and health services in accordance with RCW 70.128.066.
            (A). Signs. Signs are subject to Home Occupations of this code.
        iv. Institutional Adult Day Care. None.
    b. Additional approvals, policies, or submittals. Not applicable.
7. Detention and post detention facilities.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.

8. Emergency services (except ambulance).
    a. Standards. The following apply:
        i. Access Points. The lot shall take primary access for vehicles from no less than a primary street as defined by this code.
    b. Additional approvals, policies, or submittals. Not applicable.
9. Medical centers.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.
10. Religious institutions.
    a. Standards. The following apply:
        i. Access Points: The lot shall take primary access for vehicles from no less than a primary street as defined by this code.
        ii. Maximum Lot Size and Maximum Main Building Size for a Typical Lot. The lot must not contain more than two (2 AC) acres and main building must not exceed thirty thousand (30,000 GSF) gross square feet.
        iii. Maximum Lot Size and Maximum Main Building Size for a Lot with a School. If a religious institution also has a school, the lot must not contain more than seven (7 AC) acres and 60,000 gross square feet of building area.
    b. Additional approvals, policies, or submittals. Development that exceeds the above standards are required to obtain a Conditional Use Permit pursuant to Chapter 20.245 VMC of this code.
11. Schools (public and private).
    a. Standards. The following apply:
        i. Access Points. The lot shall take primary access for vehicles from no less than a primary street as defined by this code.
        ii. Maximum Lot Size in LS and MS Districts. The site contains no more than twelve (12) acres and not to exceed seventy-five thousand (75,000 GSF) gross square feet.
        iii. Exemption: Schools are not required to meet the Front Build-to-Line and Side Build-to-Line requirements.
    b. Additional approvals, policies, or submittals. Development that exceeds the above standards are required to obtain a Conditional Use Permit pursuant to Chapter 20.245 VMC of this code.

12. Social/fraternal and clubs/lodges.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.

C. Active Retail Uses
    1. Artisan and specialty goods production.
        a. Standards. The following apply:
            i. Public viewing and windows: A public viewing or customer service space is required on all building types with windows or glass doors covering at least twenty-five (25%) percent of the front of the building face abutting the street or indoor lobby wall.
            ii. Visibility of activities: Activities except loading shall occur within the buildings; outdoor storage and repair is prohibited
        b. Additional approvals, policies, or submittals. Not applicable.
    2. Eating and drinking establishments.
        a. Standards. The following apply:
            i. Drive Thru: Drive-through eating and drinking establishments are only allowed in the MX district.
        b. Additional approvals, policies, or submittals. Not applicable.
    3. Personal services
        a. Standards. Not applicable.
        b. Additional approvals, policies, or submittals. Not applicable.
    4. Repair-oriented
        a. Standards. Not applicable.
        b. Additional approvals, policies, or submittals. Not applicable.
    5. Sales-oriented.
        a. Standards. The following apply:
            i. Marijuana and marijuana-related stores: Marijuana and marijuana-related stores are subject to:

(A). Distance Restrictions. A marijuana retail, processing, or production business shall not be located on parcels located within one thousand feet (1000') of parcels containing any of the following uses, as officially defined in WAC 314-55-010. The distance shall be measured as the shortest straight line from property line to property line, as set forth in WAC 314-55-050(10).

(1). Elementary or secondary school, public or private;

(2). Playground, publicly managed;

(3). Recreation center or facility, providing a broad range of activities intended primarily for minors and managed by a public or charitable nonprofit entity;

(4). Child care facility, licensed by the Department of Early Learning providing child care regularly for less than twenty-four (24) hours;

(5). Public park, having facilities for active or passive recreation, exclusive of trails;

(6). Public transit center where several transit routes converge;

(7). Library; or

(8). Game arcade where admission is not restricted to persons age twenty-one (21) and older.

(B). Retail marijuana retail business shall not be located within three hundred (300') feet of other state-licensed marijuana retail business, as measured from property line to property line as specified in this chapter.

(C). Prohibitions.

(1). Retail, processing, and production businesses are prohibited in LS and MS districts.

(2). Marijuana businesses are not permitted as a home occupation shall not operate at a dwelling and shall not be located in a mobile structure.

(3). Retail marijuana business shall not sell marijuana, marijuana-infused products, or marijuana paraphernalia or otherwise be open for business before eight (8) am or after eleven (11:00) pm on any day.

(D). Signs. For signage, marijuana retail, processing and production businesses shall be subject to the substantive requirements of Chapter 314-55-155 WAC and Section 20.450.050 VMC, whichever is more restrictive. No off-premises signage is permitted.

(E). Outdoor limitations.

(1). A marijuana business must take place within a fully enclosed secure indoor facility or greenhouse with rigid walls, a roof, and doors.

(2). Marijuana plants, products, and paraphernalia shall not be visible from outside the building in which the marijuana business is located.

(F). Storage. In addition to the security requirements in Chapter 315-55 WAC, during nonbusiness hours, all recreational marijuana producers, processors, and retailers shall store all useable marijuana, marijuana-infused product, and cash in a safe or in a substantially constructed and locked cabinet. The safe or cabinet shall be incorporated into the building structure or securely attached thereto. For useable marijuana products that must be kept refrigerated or frozen, these products may be stored in a locked refrigerator or freezer container in a manner approved by the Planning Official, provided the container is affixed to the building structure.

(G). Additional approvals, policies, or submittals.

(1). Licensing. To operate within the City, each recreational marijuana business is required to have a current license issued by Washington State under the provisions of Chapter 314-55 WAC and a current business license issued by the City under the provisions of Chapter 5.04 VMC. No application for a business license for a marijuana business shall be accepted unless the applicant has a current license issued under Chapter 314-55 WAC.

(2). State Requirements.

(3). Marijuana businesses are subject to all applicable requirements of Title 69 RCW and Chapter 314-55 WAC and other state statutes, as they now exist or may be amended.

(4). Marijuana businesses shall incorporate odor control technology and provisions and ensure that emissions do not exceed Southwest Washington Clean Air Agency regulations, including but not limited to those specified for odors at 400.040(4).

(5). City Restrictions. No more than twelve (12) retail marijuana businesses shall be allowed within the city.

(6). Nuisance Declared. The City of Vancouver finds that production or processing of marijuana or marijuana infused products or storage or growing of plants in residences, pursuant to RCW 69.51A, that can be readily seen by normal unaided vision, or readily smelled, from a public place or private residence shall constitute a nuisance for enforcement purposes.

(7). Enforcement of Violations. Violations of this Chapter shall be subject to enforcement action as provided in the Uniformed Controlled Substances Act, Title 69 RCW. In addition, violations of this Chapter shall be subject to the enforcement provisions set forth in VMC Chapter 20.140.

(8). Non-Conforming Uses. No use that constitutes or purports to be a marijuana producer, marijuana processor, or marijuana retailer, as those terms are defined in this ordinance, that was engaged in that activity prior to the enactment of this ordinance shall be deemed to have been a legally established use under the provisions of the Vancouver Municipal Code and that use shall not be entitled to claim legal non- conforming status.

D. Passive Retail Uses

1. Animal kennel/shelters.

a. Standards. The following apply:

i. Compliance:

(A). Applicants shall demonstrate compliance with all of the requirements of Section 20.450.008 VMC Off-Site Impacts, and Section 8.24 VMC, Animals.

(B). Dog day care activities within kennels shall comply with Section 20.430.050 VMC Passive Retail Uses – Dog day care, except that limits on the number of dogs shall be as specified herein.

ii. Setbacks. Where allowed, kennels and shelters shall be located not less than fifty (50') feet from any property line.

(A). Kennels providing adequate soundproofing pursuant to the off-site noise provisions of Section 20.450.040 VMC may have said setback wholly or partially waived to no less than the extent of any main or accessory building setbacks as may also be applicable.

(B). Access. Such facilities shall provide automobile and truck ingress and egress.

(C). Parking. Such facilities shall provide parking and loading spaces so designed as to minimize traffic hazards and congestion.

(D). Limits. Capacity shall be no more than one hundred and seventy-five (175) animals at one time; provided, that the animal control agent has the authority to limit proposed facilities to lower capacity levels where necessary to achieve full compliance with all applicable standards.

b. Additional approvals, policies, or submittals. Not applicable.

2. Adult entertainment.

   a. Standards. The purpose of these regulations is to separate certain uses from the secondary effects of adult entertainment businesses by establishing criteria to adequately separate such establishments from neighborhoods, schools, permanent religious institutions, licensed daycare facilities and parks. The following apply:

      i. Applicability: Adult entertainment business as defined in this Section shall be allowed as a conditional use in the IC, IE, and HI districts subject to a Type II review. The use shall be subject to the following development standards:

         (A). Distance restrictions. It shall be unlawful for anyone to establish an adult entertainment business or to relocate an adult entertainment business within one thousand feet (1,000›) measured in a straight line without regard to intervening structures or objects, of any existing adult business or public park; child care facility licensed by the State of Washington; preschool; permanent religious institution; and/or public or private elementary, middle, junior high or high school.

         (B). Distance restrictions from a residential district. It shall further be unlawful to locate or relocate any adult entertainment business within five hundred (500') of the LS, MS, MX, and RA districts.

      ii. Non-conforming status. The location of a newly-established public park, licensed child care facility, permanent religious institution, preschool or school within one thousand (1,000') or the establishment of an LS, MS, MX, or RA district within five hundred (500') of an existing adult entertainment business shall not cause the existing adult entertainment business to be deemed a nonconforming use.

      iii. Enforcement of violations. Anyone convicted of violating this Section shall be subject to enforcement actions as contained in Chapter 20.140 VMC Enforcement. If subject to an enforcement action, the applicant shall be sentenced to a maximum thirty (30) calendar days in jail, or fined a maximum five hundred ($500) dollars per such violation.

   b. Additional approvals, policies, or submittals. Not applicable.

3. Auto salvage/repair.

   a. Standards. Not applicable.

   b. Additional approvals, policies, or submittals. Not applicable.

4. Bulk sales.

   a. Standards. Not applicable.

   b. Additional approvals, policies, or submittals. Not applicable.

5. Commercial and transient lodging (i.e., hotels, etc.).

   a. Standards. The following apply:

      i. General. In all zoning district, bed-and-breakfast establishments containing three to six bedrooms for guests must meet the Department of Health Bed-and-Breakfast Guidelines. These guidelines are enforced by DSHS.

      ii. Specific to LS and MS.

         (A). In LS and MS districts. A bed-and-breakfast establishment must be accessory to a Household Living use on a site, as defined in Section 20.160.020(A)(1) VMC. This means that an individual or family which operates the establishment must occupy the house as their primary residence. The house must have been used as a residence for at least a total of five (5) years prior to filing the application for a bed-and- breakfast establishment.

         (B). In LS and MS districts. Banquets, parties, weddings or meetings for guests or other non-family members for the general public are prohibited. These services may be provided only to residents or overnight patrons of the facility.

         (C). In LS and MS districts. Residential structures may be remodeled for the development of bed-and-breakfast establishments. Structural alterations may not be made which prevent the structure from being used as a house.

   b. Additional approvals, policies, or submittals. The following apply:

      i. Conditional. A three (3) – six (6) bedroom bed-and-breakfast establishment in the LS zones is permitted as a conditional use, subject to the requirements of Chapter 20.245 VMC Conditional Uses, Chapter 20.210 VMC Decision-Making Procedures, and the requirements of state law.

      ii. Permit Type. A bed-and-breakfast-establishment in MS, MX, RA, IC is subject to a Type I review, pursuant to Section 20.285.040 VMC.

      iii. Submittal.

         (A). Site plan. A site plan showing where guest parking will be provided.

         (B). Floor plan. A floor plan of both existing structure and modifications for bed-and-breakfast use.

      iv. Traffic impacts. A statement indicating the potential impact on traffic in the area.

v. State certification. For establishments containing three (3) or more units, a statement from the State Department of Social and Health Services indicating that the proposed bed-and-breakfast can meet the DSHS's Bed-and-Breakfast Guidelines.

vi. Sign plan. Proposed sign plan if applicable.

6. Dog day care.

a. Standards. The following apply:

i. General: Regardless of the zone, all Dog Day Care facilities shall comply with the following:

(A). Extent. The dogs may be groomed, trained, exercised and socialized, but not kept or boarded overnight, bred, sold, or let for hire.

(B). Facilities. Dog Day Care facilities shall be subject to Section 8.24 VMC – Animals.

(C). Walls. Walls, partitions and floor/ceilings assemblies separating Dog Day Care facilities from residential uses shall have a sound transmission class (STC) as required by the Building Code.

(D). Fencing. Fencing for all on-site outdoor recreation areas shall provide full containment for the dogs. The fence structure shall be deep enough and secured to the ground to prevent escape and high enough to prevent dogs from jumping or climbing over. The Fence shall be subject to Section 20.450.020 VMC Fences and Walls.

(E). Licenses/Permits. The applicant shall be required to obtain all licenses and permits, and meet the City's Limited and Conditional Use and Site Plan review requirements, as applicable.

ii. Specific to MS.

(A). Lot size: Minimum lot size of one (1) acre.

(B). Maximum Dogs. Thirty (30) dogs maximum on premises.

(C). Activity Setbacks. Outdoor areas where dogs will be allowed must be a minimum of fifty (50') feet from any property line. This does not apply if all activity is contained indoors.

(D). Hours of Operation. Six (6) a.m. to nine (9) p.m.

iii. Specific to MX and RA.

(A). Lot size. None.

(B). Maximum Dogs. Forty (40) dogs maximum on premises.

(C). Activity Setbacks. Outdoor areas where dogs will be allowed must be a minimum of fifty (50') feet from any property line if the dog day care facility abuts the LS or MS districts. This does not apply if all activity is contained indoors.

(D). Hours of Operation. Six (6) a.m. to ten (10) p.m.

iv. Specific to IE and HI.

(A). Lot size. None

(B). Maximum Dogs. None

(C). Activity Setbacks. Outdoor areas where dogs will be allowed must be a minimum of fifty (50') feet from any property line if the dog day care facility abuts the LS or MS districts. This does not apply if all activity is contained indoors.

(D). Hours of Operation: 6 Six (6) a.m. to ten (10) p.m.

b. Additional approvals, policies, or submittals. Not applicable.

7. Electric vehicle (EV) battery exchange station.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

8. Electric vehicle (EV) charging station (stand-alone).

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

9. Indoor entertainment.

a. Standards. The following apply:

i. Indoor Target Shooting Ranges.

(A). Building design and construction.

(1). Solid masonry or concrete on all walls in the shooting areas.

(2). Trap construction to prevent bullet penetration and ricochet.

(3). Sound baffling to assure noise levels not greater than sixty-five (65) dBA at the property line.

(4). Air ventilation and filtration system capable of removing dangerous levels of smoke and particulates.

(B). Noise.

(1). Hearing protection devices shall be required for all persons exposed to noise levels above seventy-five (75) dBA.

(2). Baffling to assure noise levels do not exceed sixty (60) dBA in the waiting area and fifty (50) dBA in the office area.

b. Additional approvals, policies, or submittals. The following apply:

i. Permits. Air emission permit shall be obtained from Southwest Clean Air Agency (SWCAA) prior to occupancy permit.

10. Major event entertainment.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. The following apply:

i. Conditional uses. Conditional Use approval requires review through the process set forth in Chapters 20.245 and 20.210 VMC.

11. Motor vehicle sales/rental.

a. Standards. The following apply:

i. Minimum lot size. Minimum lot size is forty thousand (40,000 SF) square feet or ten thousand (10,000 SF) square feet for a corner lot.

ii. Primary street access. Must be located on a primary street with average traffic in excess of ten thousand (10,000) trips per day.

iii. Vehicle display location: No vehicle display in setback areas is allowed.

b. Additional approvals, policies, or submittals. Not applicable.

12. Motor vehicle servicing/repair.

a. Standards. The following apply:

i. Lot Size. Minimum lot area shall be ten thousand (10,000 SF) square feet.

ii. Frontage. Each lot area shall contain at least one hundred (100') frontage on a public street.

iii. Parking.

(A). Loading docks. All loading docks shall be outfitted with electric wiring and conduit extending to electric panels to enable future installation of outlets for charging of electric-powered trucks.

(B). Electric Vehicle Charging. EV charging stations shall be provided at a minimum of twenty (20%) percent of parking spaces on site.

iv. Landscaping. Trees shall be planted at a density of at least thirty-three (33) tree units per acre of the project site, subject to the size, locational and maintenance requirements of Chapter 20.450 VMC. Such additional trees may be planted in a tree tract on site or at an off-site location owned by the applicant and within the limits of the designated neighborhood association within which the development is located, and as approved by the city forester.

v. Fencing. A solid or woven fence or solid evergreen hedge, free of advertising, which is six (6') feet in height, shall be maintained along property lines which abut the LS, MS, MX, and RA districts.

vi. Surfacing. The entire area to be used for driveway, service or parking shall be surfaced with light bituminous macadam or better.

vii. Off-site impacts.

(A). Compliance. The facility shall comply with all of the applicable requirements of Section 20.450.040 VMC Off-Site Impacts governing glare, noise, vibration, dust and heat.

(B). Idling. Truck engine idling is prohibited while parked or loading/unloading.

viii. Outdoor limitations.

(A). Repair work. All repair work shall be done within an enclosed building.

(B). Retail. Sale of merchandise shall be conducted within a building except for items used for the maintenance and servicing of automotive vehicles.

b. Additional approvals, policies, or submittals. Not applicable.

13. Outdoor sales

a. Standards. The following apply:

i. Compliance: All development is subject to Chapter 20.450 VMC.

b. Additional approvals, policies, or submittals. Not applicable.

14. Self-service storage

a. Standards. The following apply:

i. General use prohibition. Self-storage units shall not be used for:

(A). Heavy manufacturing, fabrication, or processing of goods, service or repair of vehicles, engines, appliances or other electrical equipment, or any other heavy industrial activity.

(B). Conducting garage or estate sales. This does not preclude auctions or sales for the disposition of abandoned or unclaimed property.

(C). Storage of flammable, perishable or hazardous materials or the keeping of animals.

ii. Residential use prohibition. No tenant may use a self-service storage facility for residential purposes.

iii. Locational prohibitions. Self-service storage shall be prohibited on properties located in whole or part within five hundred (500') feet of primary streets, which is measured from the centerline of the street. Map on file with department and available for search on individual site-specific parcels.

iv. Other prohibitions. Outdoor storage is prohibited. All goods and property stored at a self-storage facility shall be stored in an enclosed building. No outdoor storage of boats, RVs, vehicles, or similar, or storage in outdoor storage pods or shipping containers is permitted.

v. Buildings.

(A). Self-service storage is permitted only within multi-story structures.

(B). Self-storage units shall gain access from the interior of the building(s) or site. No unit doors may face the street.

(C). Each floor above the ground floor of a self-storage facility building that is facing a street shall at a minimum be comprised of fifteen (15%) percent glass.

vi. Public Realm. At least seventy (75%) percent of the width of any new or reconstructed first-story building wall facing a primary street shall be devoted to interest-creating features, such as pedestrian entrances, reliefs, murals, landscaping, transparent show or display windows, or windows affording views into retail, office, or lobby space.

vii. Staffing and security requirement. One (1) ground floor caretaker/security/manager residence is allowed if it is an integral part of a mini-storage building.

b. Additional approvals, policies, or submittals. The following apply:

i. Expansions. Existing self-service storage businesses are permitted to expand or construct new buildings within parcels being used for self-storage as of the date of adoption of the ordinance codified in this Section. The expansion or new construction shall be consistent with and meet all applicable standards of the zoning district as well as this Chapter.

15. Vehicle fuel sales (i.e., gas stations)

a. Standards. The following apply:

i. Lot Size. Minimum lot area shall be 10,000 square feet.

ii. Frontage. Each lot area shall contain at least 100’ frontage on a public street.

iii. Parking.

(A). Loading docks. All loading docks shall be outfitted with electric wiring and conduit extending to electric panels to enable future installation of outlets for charging of electric-powered trucks.

(B). Electric Vehicle Charging. EV charging stations shall be provided at a minimum of twenty (20%) percent of parking spaces on site.

iv. Landscaping. Trees shall be planted at a density of at least thirty-three (33) tree units per acre of the project site, subject to the size, locational and maintenance requirements of Chapter 20.450 VMC. Such additional trees may be planted in a tree tract on site or at an off-site location owned by the applicant and within the limits of the designated neighborhood association within which the development is located, and as approved by the city forester.

v. Fencing. A solid or woven fence or solid evergreen hedge, free of advertising, which is six (6’) feet in height, shall be maintained along property lines which abut the LS, MS, MX, and RA districts.

vi. Surfacing. The entire area to be used for driveway, service or parking shall be surfaced with light bituminous macadam or better.

vii. Off-site impacts.

(A). Compliance. The facility shall comply with all of the applicable requirements of Section 20.450.040 VMC governing glare, noise, vibration, dust and heat.

(B). Idling. Truck engine idling is prohibited while parked or loading/unloading.

viii. Outdoor limitations.

(A). Repair work. All repair work shall be done within an enclosed building.

(B). Retail. Sale of merchandise shall be conducted within a building except for items used for the maintenance and servicing of automotive vehicles.

b. Additional approvals, policies, or submittals. Not applicable.

E. Office Uses

1. Extended office.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

2. General office.

a. Standards. The following apply:

i. Exclusion: Excludes medical office and related facilities.

b. Additional approvals, policies, or submittals. Not applicable.

3. Medical office.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

F. Industrial Uses

1. Bulk fossil fuel storage and handling facility.

a. Standards. The following apply:

i. Compliance.

(A). Non-Capacity Improvements. The city may approve activities or structures for one or more of the following purposes as a limited use, provided there is no increase in baseline capacity:

(1). Maintenance, repair, or replacement.

(2). Improvement of the safety or security of the infrastructure, including seismic upgrades.

(3). Decrease in air or water emissions.

(4). Allow the facility infrastructure or buildings to meet new regulatory requirements.

(5). Addition of accessory structures or activities that do not add to the baseline capacity of the facility.

ii. Non-capacity improvements. The applicant for non-capacity improvements shall specify the baseline capacity for the facility as of the date of the ordinance codified in this Section.

iii. Standards for Bulk Fossil Fuel Storage and Handling Facilities – New or Capacity Expansion.

(A). New Facilities. New bulk fossil fuel storage and handling facilities are prohibited, regardless of size.

(B). Baseline Established. The baseline for storage, transportation, and transshipment facilities is established by the following information available as of November 3, 2022. Storage baseline capacity shall be established using Washington Department of Ecology industrial chapter permits and oil spill prevention plans or other verifiable documentation. Transshipment and transportation facility baseline is established through the most recent spill prevention plans approved by the Department of Ecology or where a local permit documenting such facilities has been approved more recently. If an existing facility does not have an established refining or storage baseline from a past industrial chapter permit or spill prevention plan, the baseline must be established as part of a permit application.

(C). Expansion. Expansion of bulk fossil fuel storage and handling facilities is allowed up to fifteen (15%) percent increase above the baseline capacity if converted to cleaner fuels, as defined by Section 20.150.040A VMC, and subject to the requirements of Chapter 20.430 VMC.

(D). Bulk fossil fuel storage and handling facilities are greater than sixty thousand (60,000 GA) gallons cumulative storage.

(E). Prohibited. New bulk fossil fuel storage and handling facilities are prohibited in all zoning district.

iv. Non-Capacity Improvements. Activities or structures that do not include capacity improvements are permitted. This includes maintenance, repair, or replacement; the improvement of the safety or security of the infrastructure, including seismic upgrades; decrease air or water emissions; upgrading to meet new regulatory requirements; addition of accessory structures.

b. Additional approvals, policies, or submittals. The following apply:

i. Federal Laws. The director may refer to RCW 82.38.020 or other state or federal laws to assist in interpretation of this use classification.

ii. Existing Facilities. Existing bulk fossil fuel storage and handling facilities converted to cleaner fuels may be expanded, subject to approval of a conditional use permit and compliance with this Section.

iii. Maintenance and Safety. Maintenance and safety improvements to existing bulk fossil fuel storage and handling facilities are allowed subject to compliance with requirements in this Section.

iv. Non-Capacity Specifications. The applicant for non-capacity improvements shall specify the baseline capacity for the facility as of the date of the ordinance codified in this section of this chapter.

2. Cleaner fuels storage and handling facility.

a. Standards. The following apply:

i. Non-Capacity Improvements. The city may approve activities or structures for one or more of the following purposes as a conditional use, provided there is no increase in baseline capacity:

(A). Maintenance, repair, or replacement.

(B). Improvement of the safety or security of the infrastructure, including seismic upgrades.

(C). Decrease in air or water emissions.

(D). Allow the facility infrastructure or buildings to meet new regulatory requirements.

(E). Addition of accessory structures or activities that do not add to the baseline capacity of the facility.

ii. Non-capacity improvements. The applicant for non-capacity improvements shall specify the baseline capacity for the facility as of the date of the ordinance codified in this chapter.

iii. Standards for Cleaner Fuels Storage and Handling Facilities – New or Expansion.

(A). New or expanded facilities. New or expanded cleaner fuel storage and handling facilities are allowed subject to a conditional use permit if no larger than one million (1,000,000 GA) gallons of cumulative storage, on a site three (3 AC) acres or less in size, and if located at least one thousand (1,000') feet from the LS, MS, MX, and RA Districts. Size cannot exceed the smaller of one million (1,000,000 GA) gallons or site acreage three acres. Such facilities shall meet spill prevention/fire response, seismic upgrade, GHG assessment, and annual reports in this chapter.

(B). Existing facilities. Existing bulk fossil fuel storage and handling facilities may be converted to cleaner fuels, as defined by Section 20.150.040A VMC, as a conditional use, subject to the requirements of this chapter.

(C). Conversion to cleaner fuels. Existing bulk fossil fuel storage and handling facilities converted to cleaner fuels may be expanded, subject to approval of a conditional use permit and compliance with the following criteria:

(1). Total or partial conversion. Total or partial conversion of an existing fossil fuel storage and handling to cleaner fuel infrastructure is allowed. If a facility is converted the facility may be increased by up to fifteen (15%) percent above the baseline capacity. The expansion shall be in proportion to the amount of cleaner fuel storage. For example, if twenty-five (25%) percent of the facility is converted to cleaner fuels, the storage and handling infrastructure may expand by three and three-quarters (3/4%) percent. If fifty (50%) percent of the facility is converted to cleaner fuels, storage and handling infrastructure may expand by seven and one-half percent (7.5%). If one hundred (100%) percent of the facility is converted into cleaner fuels storage and handling, then fifteen (15%) percent of the infrastructure may be increased.

(2). Shared facilities. If a fossil fuel storage and handling facility is partially or fully converted to cleaner fuel infrastructure, that share of the facility used for cleaner fuel storage, transportation, or transshipment of petroleum-based fossil fuels shall be maintained on the overall site; products may be moved to different storage tanks on the site; provided, that the cleaner fuel percentage of the total storage is maintained. The applicant shall provide a comprehensive spill prevention plan and fire response plan to the satisfaction of the planning official and fire marshal.

(3). Seismic upgrades. Seismic upgrades pursuant to current building code requirements shall be made to any existing fuel storage facilities.

(4). GHG Assessment. Greenhouse gas emissions impacts shall be assessed for expanded facilities. The applicant is responsible to provide an expert evaluation by a qualified professional consistent with the requirements of this code. The evaluation shall document baseline life cycle greenhouse gas emissions from the facility, net increases in life cycle greenhouse gas emissions, and mitigation of greenhouse gas emission increases. Life cycle emissions shall be quantified as defined in 42 U.S.C. § 7545. The planning official shall require mitigation to address the project's direct greenhouse gas emissions and may require mitigation to address the project's indirect emissions. The assessment shall address mitigation for net increases in greenhouse gas emissions, which may include, but is not limited to, one or more of the following: on-site efficiency improvements, carbon capture and storage, purchase of carbon offsets from any carbon registry approved by the city or a state agency, implementation of strategies in Vancouver's Climate Action Plan, or other measures approved by the planning official. The mitigation may concurrently satisfy any other requirements imposed by county, state or federal governments. Mitigation shall be made conditions of approval, and shall be specific, identifiable, quantifiable, permanent, enforceable, and verifiable.

(5). Financial Assurance in Case of Accidents. To ensure applicants are able to mitigate the consequences of accidents, proof of financial assurance (such as trust funds, letters of credit, insurance, self-insurance, financial tests, corporate guarantees, payment bonds or performance bonds) shall be provided sufficient to comply with the financial responsibility requirements set forth in any state and federal law applicable to their proposed project. If the applicant relies on an insurance policy for compliance with a state or federal financial assurance requirement, the applicant must add the city of Vancouver as an additional insured as a condition of permit issuance.

(6). Annual Report. The applicant shall provide an annual report to the planning official of the following:

i. Description. A description of on-site storage capacity including the number of tanks, tank volumes, and products.

ii. Vessel transfers. The number of vessel transfers of fuel, both inbound and outbound from the site, the type and quantity of products transferred, and the product destination.

iii. Rail cars transporting fuels. The number of rail cars transporting fuels, both to and from the site, including a description of the product, volume, and destination.

iv. Trucks transporting fuels. The number of trucks transporting fuels, both to and from the site, including a description of the product, volume, and destination.

v. Documentation. Documentation that on-site activity is similar to the established baseline of storage and/or throughput.

vi. Compliance. Conformity with applicable regional, state, and federal reporting or permit requirements pursuant to laws and rules implemented by Southwest Washington Clean Air Agency, Washington Department of Ecology, U.S. Environmental Protection Agency, and U.S. Energy Information Administration to ensure compliance with the requirements herein.

b. Additional approvals, policies, or submittals. The following apply:

i. Non-capacity Specifications. The applicant for non-capacity improvements shall specify the baseline capacity for the facility as of the date of the ordinance codified in this chapter.

ii. Capacity Specifications. The applicant shall document the existing baseline, and any proposed additional storage capacity and fuel type(s) to be stored. Documentation shall be consistent with this chapter.

3. Employment services.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

4. Energy plants.

a. Standards. The following apply:

i. Prohibition on coal-fired plants. Coal-fired electricity generating plants are prohibited.

ii. Prohibition on biomass energy plants. Biomass energy generating plants are prohibited within the

b. Additional approvals, policies, or submittals. Not applicable.

5. Industrial services.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

6. Manufacturing and production.
    a. Standards. The following apply:
        i. Specific Use Prohibition. Electroplating and related uses not permitted in any zoning district.
        ii. Size Limitation. Maximum manufacturing or production uses of twenty thousand (20,000 GSF) gross square feet allowed on lot applicable in RA district only.
        iii. Conditional Use. Manufacturing or production uses over twenty thousand (20,000 GSF) gross square feet subject to a Conditional Use permit.
    b. Additional approvals, policies, or submittals. The following apply:
        i. MX and RA District. Microbreweries and manufacturing of optical, medical and dental devices, goods, and equipment allowed by right; all other types of manufacturing uses are conditional.
7. Organic materials management facilities.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable
8. Recycling facilities.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.
9. Research and development.
    a. Standards. The following apply:
        i. Size Limitation and Clean Air Permit in MX and RA Districts. Maximum research and development uses of twenty thousand (20,000 GSF) gross square feet allowed on lot. Use cannot require a Southwest Washington Clean Air Permit.
    b. Additional approvals, policies, or submittals. Not applicable.
10. Small fossil fuel or cleaner fuel storage and distribution facilities.
    a. Standards. The following apply:
        i. Non-Capacity Improvements. The city may approve activities or structures for one or more of the following purposes as a conditional use, provided there is no increase in baseline capacity:
            (A). Maintenance, repair, or replacement.

(B). Improvement of the safety or security of the infrastructure, including seismic upgrades.

(C). Decrease in air or water emissions.

(D). Allow the facility infrastructure or buildings to meet new regulatory requirements.

(E). Addition of accessory structures or activities that do not add to the baseline capacity of the facility.

ii. Other Non-capacity improvements. The applicant for non-capacity improvements shall specify the baseline capacity for the facility as of the date of the ordinance codified in this chapter. The baseline for storage, transportation, and transshipment facilities is established by the following information available as of November 3, 2022. Storage baseline capacity shall be established using Washington Department of Ecology industrial chapter permits and oil spill prevention plans or other verifiable documentation. Transshipment and transportation facility baseline is established through the most recent spill prevention plans approved by the Department of Ecology or where a local permit documenting such facilities has been approved more recently. If an existing facility does not have an established refining or storage baseline from a past industrial chapter permit or spill prevention plan, the baseline must be established as part of a permit application.

iii. Standards for New or Expanded Small Fossil Fuel or Cleaner Fuel Storage and Distribution Facilities.

(A). Existing baseline. The applicant shall document the existing baseline, and any proposed additional storage capacity and the fuel type(s) to be stored. Documentation shall be consistent with the requirements for non-capacity improvements in this chapter.

(B). Seismic upgrades. The planning official shall require seismic upgrades to existing facilities as a condition of the land use permit.

(C). Adjacency to residential uses. New small fossil fuel or cleaner fuel storage and distribution facilities shall be located at least one thousand (1,000') feet away from residentially zoned properties.

b. Additional approvals, policies, or submittals. Not applicable.

i. Comprehensive spill prevention and fire response plans. The applicant shall obtain approval of comprehensive spill prevention and fire response plans to the satisfaction of the planning official and fire marshal.

11. Solid Waste Handling facilities.
    a. Standards. The following apply:
        i. Radioactive or high explosive materials. Ten-day hazardous waste handling and transfer facilities do not include facilities handling radioactive or high explosive materials.
        ii. Repackage waste. Ten-day hazardous waste facilities shall not repackage waste.
        iii. Distance from Residential Uses. Ten-day hazardous waste facilities shall be located at least two hundred (200') feet from any residential use.
        iv. Hazardous Waste Storage. Ten-day hazardous waste facilities shall not store hazardous wastes, except those described under 40CR Part 273, for more than ten (10) days.
    b. Additional approvals, policies, or submittals. See Section 20.450.055 VMC.
12. Truck stops.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.
13. Warehouse/freight movement.
    a. Standards. The following apply:
        i. Maximum Size in IC and IE District. Warehouse/freight movement buildings up to two hundred fifty thousand (250,000 GSF) square feet of gross floor area on the ground floor of the building allowed, provided all activities, except outdoor storage of materials, are wholly contained within building(s).
        ii. Prohibition. Warehouse/freight movement buildings larger than two hundred fifty thousand (250,000 GSF) of gross floor area on the ground floor of the building are prohibited.
        iii. Miscellaneous Standards. Warehouse/freight movement uses larger than two hundred fifty thousand (250,000 GSF) of gross floor area on the ground floor per building allowed must meet the following:
            (A). Traffic. Tractor trailers delivering goods to or from warehouses covered by this chapter shall not travel on Fruit Valley Road.
            (B). Visual Impact Reduction. Warehouses covered by this chapter located adjacent to a public street or highway shall provide a combination of:
                (1). Architectural elements. Architectural elements such as windows, articulation of the façade, and/or moderately dark color (e.g., not white or light-colored) walls; and

(2). Landscape buffer. A twenty-five (25') foot deep landscaped buffer between the building and street or highway consisting of native or climate adaptive conifer trees that typically reach at least sixty (60') feet in height at maturity, spaced no further than twenty (20') feet apart. If a sidewalk or utility easement exists in the landscaped buffer, the minimum width shall be increased accordingly. Such buffer area may be counted toward meeting tree density requirements.

iv. Climate Action Measures.

(A). Building roofs. Building roofs shall be designed and constructed to handle the structural load of solar panels and equipment, electrical panels and conduit shall be installed to facilitate rooftop solar panels in the future, and rooftop HVAC systems shall be clustered as much as possible to facilitate maximum use of roof area for solar panels.

(B). Roof windows. Skylights and/or clerestory windows shall be provided to facilitate natural light; skylights shall be double-paned and located to facilitate maximum use of roof area for solar panels.

(C). Roof color. Roofs shall be white or light colored to reduce heat retention.

(D). Truck Idling. Truck engine idling is prohibited while parked or loading/unloading.

(E). Loading docks. All loading docks shall be outfitted with electric wiring and conduit extending to electric panels to enable future installation of outlets for charging of electric-powered trucks.

(F). Electric Vehicle Charging. EV charging stations shall be provided at a minimum of twenty (20%) percent of parking spaces on site.

(G). Trees. Trees shall be planted at a density of at least thirty-three (33) tree units per acre of the project site, subject to the size, locational and maintenance requirements of Section 20.450.035 VMC. Such additional trees may be planted in a tree tract on site or at an off-site location owned by the applicant and within the limits of the designated neighborhood association within which the development is located, and as approved by the city forester.

b. Additional approvals, policies, or submittals. Not applicable.

14. Wholesale sales.

a. Standards. The following apply:

i. Maximum Size. Wholesale sales buildings up to two hundred fifty thousand (250,000 GSF) square feet of gross floor area on the ground floor of the building allowed, provided all activities, except outdoor storage of materials, are wholly contained within building(s).

ii. Prohibition. Wholesale sales buildings larger than two hundred fifty thousand (250,000 GSF) of gross floor area on the ground floor of the building are prohibited.

b. Additional approvals, policies, or submittals. Not applicable.

G. Infrastructure Uses

1. Airports/airparks.

a. Standards. The following apply:

i. Prohibition on New Facilities. New airports/airparks are prohibited.

b. Additional approvals, policies, or submittals. See Section 20.450.045 VMC.

2. Basic utilities.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. See Section 20.450.065 VMC.

3. Data centers.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

4. Heliports.

a. Standards. The following apply:

i. Landing Strip Orientation. All landing strips for aircraft or heliports shall be so designed and the runways and facilities so oriented, that the incidence of aircraft passing directly over dwellings during their landing or take-off patterns is minimized. They shall be located so that traffic shall not constitute a nuisance to neighboring uses. The proponents shall show that adequate controls or measures will be taken to prevent offensive noise, vibrations, dust, or bright lights.

ii. Airpark related uses. Airpark related uses are permitted in Pearson Airpark and Evergreen Airport only.

b. Additional approvals, policies, or submittals. The following apply:

i. Conditional Uses.

ii. New landing strips and heliports. New landing strips and heliports shall not be construed to be permitted in any base zoning established by this Title, unless and until a conditional use permit shall first have been secured.

iii. Review process. Approval requires review through the process set forth in Chapters 20.245 and 20.210 VMC.

5. Major utility facilities.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. See Section 20.450.045 VMC.
6. Park and ride facilities.
    a. Standards. The following apply:
        i. Design. All development should be compatible with the scale, architectural style and design of buildings in the immediate vicinity and/or any adopted design guidelines and standards for the area.
        ii. Active Uses. Park & Ride facilities within corridors and urban centers designated in the Vancouver Comprehensive Plan must be designed and constructed to accommodate active uses on the street level of streets designated for active pedestrian use. Areas designed to accommodate active uses shall be developed at the time of construction.
        iii. This standard must be met along 100 percent of the ground floor walls that front onto active pedestrian streets in centers and corridors, except where used for the auto entry/exit lanes for the parking structure, or plazas, or other public open spaces.
        iv. MX and RA zones: In park & ride facilities located in these zone districts, at least 50 percent of the ground floor area in each building must be designed and constructed to accommodate the active uses allowed by the base zone. Active uses include lobbies, retail or service commercial and visitor services. The Planning Official may make an adjustment to the active use requirements for park & ride facilities when it can be demonstrated that the topography of the ground or location adjacent to highway ramps makes it infeasible.
        v. Spaces designed to accommodate active pedestrian uses shall have a minimum floor to ceiling height of 15 feet, a minimum street front bay width of 15 feet and a minimum active use space depth of 20 feet.

b. Additional approvals, policies, or submittals. The following apply:

i. Transportation Management. Applicants shall submit a Transportation Management Plan that describes on-site management systems and operations. At a minimum, this includes assurance of efficient ingress and egress; safety of facility users and adjacent properties; and that the facility will contribute to an active urban center or corridor by providing parking opportunities during nonpeak hours for non transit riders and as a resource for reducing overall parking need within one half (½) mile, by for example, executing a shared parking agreement. TMP shall describe how on-street and off-street parking impacts associated with the park and ride facility will be mitigated. TMP shall demonstrate compliance with all other applicable standards, including Section 20.450.065 VMC, and that the facility is designed and managed to encourage environmentally sustainable community, for example by giving priority to carpools and/or providing plug-in stations for electric vehicles.

7. Rail lines and utility corridors.

a. Standards. The following apply:

i. Distance from Residential Uses: Prohibited within two hundred (200') feet from any residential use that is a primary use.

b. Additional approvals, policies, or submittals. Not applicable.

8. Railroad yards.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

9. Structured parking facilities (i.e., parking garages).

a. Standards. The following apply:

i. Park and ride facilities. Any surface parking facility that is intended for a park and ride is subject to Section 20.430.050(G)(6).

ii. Parking Garage.

(A). Dimensions. Parking structure dimensions and design shall be subject to review and approval by the Transportation Manager.

(B). Ground-floor windows/wall openings. All above-grade parking structures shall provide ground-floor windows or wall openings along the street frontages. Blank walls are prohibited. Any wall facing the street shall contain windows, doors or display areas equal to at least twenty (20%) percent of the ground floor wall area facing the street excluding those portions of the face(s) devoted to driveway entrances and exits, stairwells, elevators and centralized payment booths. Required windows shall have a sill no more than 4› above grade. Where the interior floor level prohibits such placement, the sill may be raised to allow it to be no more than 2› above finished floor wall up to a maximum sill height of 6› above grade. These openings shall be glazed or grated.

(C). Entrance/Exit Design. Adequate vision clearance shall be provided so that motorists leaving a parking structure have a clear view of the sidewalk on either side of the exit, and so that approaching pedestrians have a clear view of any approaching vehicle. Parking structure entrances and exits shall be designed to achieve travel speeds not to exceed five (5) miles per hour, and shall require a vehicle stop directly prior to crossing the street sidewalk. Entrance and exit areas shall be designed so that vehicles approaching or leaving the parking structure can queue to enter/exit the traffic stream without blocking the sidewalk.

(D). Parking Structure Internal Design and Pedestrian Circulation. Parking structure internal circulation design shall include provisions for the safe and convenient circulation of pedestrians. Design speed shall not exceed ten (10) miles per hour, and traffic control measures shall be provided at any location where vehicle circulation crosses a pedestrian walk way.

b. Additional approvals, policies, or submittals. Not applicable.

10. Surface parking facilities (i.e., surface parking lots).

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. Not applicable.

11. Transportation facilities.

a. Standards. Not applicable.

b. Additional approvals, policies, or submittals. See Section 20.450.045 VMC.

12. Water-related or water-enjoyment (as defined by Chapter 20.730 VMC).

a. Standards. The following apply:

i. Compliance: All development is subject to Chapter 20.730 VMC.

b. Additional approvals, policies, or submittals. Not applicable.

13. Wireless communication facilities.
    a. Standards. See Section 20.450.075 VMC.
    b. Additional approvals, policies, or submittals. See Section 20.450.075 VMC.
14. Agriculture/horticulture/silviculture.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.
15. Cemeteries.
    a. Standards. The following apply:
        i. Access. A cemetery or related facility shall have its principal access on a primary street with ingress and egress designed so as to minimize traffic congestion as determined by the city engineer.
        ii. Landscaping. A cemetery shall establish and maintain a fifteen (15') foot landscape buffer along its entire perimeter except driveways, as governed by Section 20.450.035 VMC.
    b. Additional approvals, policies, or submittals. Not applicable.
16. Environmental Management and Education.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.
17. Fish hatcheries.
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.
18. Motorized recreational activities.
    a. Standards. The following apply:
        i. Motorized Boats: Motorized boats are permitted only on Vancouver Lake and the Columbia River.
    b. Additional approvals, policies, or submittals. Not applicable.
19. Parks and Natural Areas (Urban).
    a. Standards. Not applicable.
    b. Additional approvals, policies, or submittals. Not applicable.

20. Parks and Natural Areas (Regional).

    a. Standards. Not applicable.

    b. Additional approvals, policies, or submittals. Not applicable.

21. Trails.

    a. Standards. Not applicable.

    b. Additional approvals, policies, or submittals. Not applicable.

20.430.060 Accessory Use Types and Standards

A. *Purpose.* The purpose of this Section is to provide definitions and standards for accessory uses and structures.

   1. *Applicability.* An accessory use is subordinate to a primary use either within a building or on the same lot. All accessory uses are dependent upon the presence of an approved primary use.

   2. *Respect for zoning district.* It is not the intent of this chapter to provide a means to circumvent the strict application of the permitted uses in the zoning district.

   3. *Location.* All accessory uses addressed in this chapter shall be located outside of the public right-of-way.

B. *Definitions and standards.* The following definitions and standards apply:

   1. Bed and breakfast establishments. The regulations are intended to allow for a more efficient use of large, older houses for a use that has been found to be compatible with residential uses. Through these regulations, the proprietor can take advantage of the scale and often the architectural and historical significance of a residence and provide an alternative form of lodging for visitors who prefer a residential setting.

      a. Definition. A bed and breakfast establishment is an accessory use that is a residential establishment providing short-term lodging and breakfast accommodations to guests, typically operated by the property owner or manager who resides on-site.

         i. Standards. The following apply:

            (A). Development Standards.

               (1). Accessory use. In residential zoning district, a bed-and-breakfast establishment must be accessory to a Household Living use on a site, as defined in Chapter 20.160.020(A)(1) VMC. This means that an individual or family which operates the establishment must occupy the house as their primary residence. The house must have been used as a residence for at least a total of five (5) years prior to filing the application for a bed-and-breakfast establishment.

(2). Uses. In the LS, MS, MX, and RA districts, banquets, parties, weddings or meetings for guests or other non-family members for the general public are prohibited. These services may be provided only to residents or overnight patrons of the facility.

(3). Compliance with state guidelines. In all zoning district, bed-and-breakfast establishments containing three (3) to six (6) bedrooms for guests must meet the Department of Health Bed-and-Breakfast Guidelines. These guidelines are enforced by DSHS.

(4). Appearance. In the LS, MS, MX, and RA districts, residential structures may be remodeled for the development of bed-and-breakfast establishments. Structural alterations may not be made which prevent the structure from being used as a house.

(5). Parking. In the LS and MS districts, a minimum of two (2) off-street parking spaces are required. In all other zoning district, parking is subject to the requirements of this chapter. Additional off-street spaces may be required as a condition of approval for those bed-and-breakfast establishments governed by conditional use approval, per the requirements of Chapter 20.245 VMC.

(6). Signs. Signs in LS, MS, MX, RA, and IC Districts shall conform to appropriate chapters of Section 20.450.060 VMC.

(B). Additional approvals, policies, or submittals. The following apply:

(1). Site plan. A site plan showing where guest parking will be provided.

(2). Floor plan. A floor plan of both existing structure and modifications for bed-and-breakfast use.

(3). Traffic impacts. A statement indicating the potential impact on traffic in the area.

(4). State certification. For establishments containing three (3) or more units, a statement from the State Department of Social and Health Services indicating that the proposed bed-and-breakfast can meet the DSHS's Bed-and-Breakfast Guidelines.

(5). Sign plan. Proposed sign plan if applicable.

(6). Conditional Uses. A 3-6 bedroom bed-and-breakfast establishment in the LS district is permitted as a conditional use, subject to the requirements of Chapter 20.245 VMC Conditional Uses, 20.210 VMC Decision-Making Procedures, the standards included in this chapter, and the requirements of state law.

2. Domestic animals and livestock.

   a. Definition. Domestic animals and livestock as defined per 20.150.040 are allowed for hobby and personal use purposes within all zoning districts subject to the standards in this chapter below, in addition to any applicable requirements of Chapter 8.20 VMC Nuisances and Chapter 8.24 Animals.

   b. Standards. The following apply:

      i. General.

         (A). Domestic Animals. The keeping of domestic animals shall comply with all requirements of this chapter and all requirements of Chapters 8.20 VMC and 8.24, as noted above.

         (B). Off-site impacts. The keeping of domestic animals or livestock shall comply with all of the applicable requirements of Section 20.450.040 VMC,

         (C). Nuisances. The raising and keeping of animals is also subject to Chapters 8.20 VMC and 8.24.

         (D). Kennels. The keeping of four or more dogs, which are five (5) months old or older constitutes a Kennel and must meet requirements of this chapter. Excludes veterinary clinics, animal hospitals and dog day care.

         (E). Minimum Lot Size. The minimum lot size is dependent on the size of the livestock as follows:

            (1). Large Livestock. The keeping of livestock that will weigh more than five hundred (500 LBS) pounds at maturity requires a minimum lot size of one (1) acre for the first animal. For each additional animal, an additional contiguous ten thousand (10,000 SF) square feet must be available. The minimum one (1 AC) acre lot may include a normally permitted residence, provided that at least one-half (1/2) acre is still available for livestock use.

            (2). Small Livestock. The keeping of livestock that will weigh one hundred (100) to five hundred (500) pounds at maturity will require a minimum lot size of one-half (1/2) acre for the first animal. For each additional such animal, an additional contiguous five thousand (5,000 SF) square feet must be available. The minimum half (1/2 AC) acre lot may include a normally permitted residence, provided that at least one-quarter (¼ AC) acre is available for livestock use.

(3). Miniature Livestock. Miniature livestock, such as certain breeds of mini-goats and mini-horses, that will weigh under one hundred (100) pounds at maturity are considered domestic animals. The combined total of all miniature animals and dogs on a single premises shall not be more than three (3), unless the lot size requirements for small livestock specified above are met.

(4). Poultry and Rabbits. The keeping of chickens, ducks, geese, domesticated hare or rabbit, and similar animals is permitted with no required minimum lot size. No turkeys, peacocks, or roosters are permitted.

(F). Accessory Structures. Barns, sheds, and shelters used to house livestock shall be located in the rear yard and meet the same side and rear yard setbacks as the primary residence. Doorways and other openings shall be oriented away from neighboring properties. Livestock shall be confined or tethered in such a manner that intrusion on to neighboring property or damage to neighboring landscaping and fences is avoided. Such facilities shall be included in lot coverage percentage calculations.

c. Additional approvals, policies, or submittals. The following apply:

i. Prohibitions.

(A). Commercial. The raising and keeping of domestic animals for commercial purposes is prohibited. Commercial purposes does not include incidental sale of livestock off-spring, milk, or eggs subject to Washington State health and agricultural regulations.

(B). Exceptions to Swine Prohibition. Notwithstanding the above prohibition of swine, the keeping of that type of swine commonly referred to as Miniature Vietnamese, Chinese or Oriental pot-bellied pig (sus scrofa vittatus) is allowed, subject to the following conditions:

(1). The maximum height of the swine may be no more than eighteen (18”) inches at the shoulder and weight shall be no more than ninety-five (95) pounds;

(2). The swine must have been spayed or neutered prior to entry into the City;

(3). Registration, vaccination and other requirements as set forth in Chapter 8.24.022 VMC must be met; and

(4). No more than two (2) such pigs shall be kept at any one address for any period in excess of three (3) calendar days.

(C). Lot size exceptions. The minimum lot size does not apply to miniature livestock, as addressed above in this chapter or Miniature Vietnamese, Chinese or Oriental pot-bellied pig (sus scrofa vittatus), as defined herein.

(D). Off-site impact. The keeping of domestic animals or livestock shall comply with all of the applicable requirements of Section 20.450.040 VMC Off-Site Impacts.

3. Electric vehicle (EV) basic charging station.

   a. Definition. An electric vehicle (EV) basic charging station is an accessory use that is a slow to medium level charging station for electric vehicles that may be an accessory to a range of other primary uses, such as single-family residences, apartments, and businesses. Level 1 (120-volt AC) is considered slow charging. Level 2 (208- or 240-volt AC) is considered medium charging.

   b. Standards. Not applicable.

   c. Additional approvals, policies, or submittals. No land use approvals are required; however, building codes apply.

4. Electric vehicle (EV) rapid charging station.

   a. Definition. An electric vehicle (EV) rapid charging station is an industrial-grade electrical outlet that allows for faster charging of electric vehicle batteries through higher power levels and that meets or exceeds any standards, codes, and regulations set forth by Chapter 19.28 RCW and consistent with rules adopted under RCW 19.27.540. Such stations are also known as Level 3 facilities and are considered fast or rapid charging (480-volt AC) and are generally available to the public.

   b. Standards. Not applicable.

   c. Additional approvals, policies, or submittals. Not applicable.

5. Environmental management and education activities.

   a. Definition. A range of activities focused on the conservation, restoration, and sustainable management of natural resources, as well as public education on environmental topics such as habitat restoration, stormwater management, guided tours, research and monitoring, renewable energies, and waste reduction/recycling.

   b. Standards. Not applicable.

   c. Additional approvals, policies, or submittals. Not applicable.

6. Home occupation.

   a. Definition. A home occupation is an accessory use which is commercial, office or other economic activity wholly contained within the main building or accessory building within which it is located and is clearly subordinate to the primary residential use on the lot.

   b. Standards. The following apply:

i. Purpose. The purpose is to: provide presidents with an opportunity to use their homes to engage in small-scale business activities; reduce home-to-work and work-to home trips that add to the congestion on the city's streets during the morning and evening peak periods; and establish approval criteria and standards to ensure that home occupations are conducted as lawful uses that are subordinate to the residential use of the property are conducted in a matter that is not detrimental or disruptive in terms of appearance or operation to neighboring properties to protect neighborhood character.

ii. Employees. Two (2) nonresident employees are permitted for home occupation activities located in all zoning district. The primary person or persons providing the business or service must reside within the dwelling on the premises.

iii. Incidental Sales. The sale of consumer goods shall be prohibited except when the product to be sold is clearly incidental and secondary to the services authorized by such home occupation.

iv. Off-site impacts. No home occupation shall generate measurable levels at the property line of dust, smoke, odor or glare as defined in Section 20.450.040 VMC Off-Site Impacts, or noise in excess of the state standards outlined in WAC 173-06-050 as specified in Section 20.450.040 VMC. The home occupation activity shall not generate solid waste in volume or type which is not normally associated with residential use unless specifically permitted.

v. Disturbing Influences. The home occupation use shall not create electronic interference, including but not limited to: interference with radio, satellite reception, telephone or television reception.

vi. Exterior modification. To preserve the residential appearance of the structure, there shall be no evidence of the home occupation from the exterior of the structure, except one door nameplate or freestanding sign not to exceed two (2 SF) square feet is permitted. Freestanding signage shall be located within ten (10') feet of the residence and positioned facing the street parallel to the front of the residence.

vii. Limitations on customers and visitors. The combined total number of customers and business visitors associated with the home occupation shall be limited to no more than an average of six (6) per day per week (Monday through Sunday).

viii. Location of use. All uses or activities associated with home occupations shall be wholly carried on within a dwelling or accessory structure by a member or members of a family except as allowed in this chapter. Such activity shall be secondary to the use of the dwelling for living purposes. Not more than twenty-five (25%) percent of the combined floor space of such dwelling and accessory structure or one thousand (1,000 SF) square feet, whichever is less, may be used for the home occupation.

ix. Outdoor storage. No outdoor storage associated with home occupation shall be permitted.

x. Vehicles. Vehicles related to the home occupation shall be restricted to standard noncommercial cars, trucks, and vans.

xi. Examples of Permitted: examples of permitted uses include but are not limited to the following:

(A). Artists, illustrators, writers, photographers (no photo processing), editors, drafters, publishers;

(B). Professional office for consultants and other similar activities;

(C). Bookkeeping, law office, and architect;

(D). Distribution of products assembled at home for off-premises sales (such as garden produce or crafts);

(E). Janitorial services (office);

(F). Mail-order business or sales representative;

(G). Interior decorator;

(H). Manufacturer's representative

(I). Light furniture making and woodworking that does not result in the use or storage of amounts of hazardous, flammable, or combustible materials above the allowed exempt quantities as detailed in the building and fire codes adopted by VMC Titles 16 and 17.

(J). Cottage food operations, as defined by Chapter 69.07 RCW.

(K). Medical, disabled or elderly transportation service provided only one vehicle associated with the home business is permitted.

xii. Examples of Prohibited: Examples of prohibited uses include, but are not limited to, the following:

(A). Auto repair;

(B). Welding shops;

(C). Large appliance/electronics or equipment repair or service;

(D). Truck hauling and/or tow storage yard;

(E). Vehicle sales;

(F). Cabinet making;

(G). Manufacturing and/or related storage;

(H). Kennel or stable;

(I). Wholesale or retail sales;

(J). Restaurants/drinking establishments;

(K). Metal plating;

(L). Any use generating, storing or utilizing hazardous waste;

(M). Commercial limousine service.

xiii. Hours of Operation. Normal hours of operation shall be 7:00 a.m. to 8:00 p.m. with after-hours activity permitted if wholly indoors and fully compliant with the off-site impact standards of Section 20.450.040 VMC and Table 20.450.040-1 regarding maximum permissible noise levels.

c. Approvals, other policies, or submittal requirements. The following apply:

i. Permit Review. Home occupations shall be a limited use in all zoning district within legally established residential homes. Such uses shall be subject to a Type I review, pursuant to Section 20.210.040 VMC, subject to the standards in subchapter B of this chapter.

ii. Exemptions.

(A). Garage sales are exempt from obtaining a home occupation permit.

(B). Child care homes licensed by the state for the care of twelve (12) or fewer children are exempt from obtaining a home occupation permit. City business license requirements apply. No signs allowed.

(C). Adult care homes licensed by the state for the care of eight (8) or fewer persons. No signs allowed.

(D). Home occupations that occupy less than twenty-five (25%) percent of a residence (up to one thousand (1,000 SF) square feet of combined space), have no customer visits, and no on-site retail sales are exempt from obtaining a home occupation permit. The home occupation standards of this chapter and the city business license requirements apply.

7. Other accessory uses.

a. Definition. Other accessory uses which are not listed in this code are considered Unlisted uses. The Planning Official shall make a determination as to whether an Unlisted use is permitted, conditional or prohibited under the procedures of Section 20.160.030 VMC Unlisted Use: Authorization of Similar Use process.

b. Standards. Not applicable.

c. Additional approvals, policies, or submittals. Not applicable.

8. Residential adult day care.

a. Definition. Residential adult day care is an accessory use which involves the provision of adult day care services for six (6) or fewer handicapped and/or elderly adults, with or without compensation, in the home of the provider.

b. Standards. The following apply:

i. Compliance. Adult care facilities for six (6) or fewer adults are allowed and are subject to compliance with the standards governing home occupations.

ii. Limitation in MS. Adult day care facilities with twelve (12) or fewer clients are permitted outright; larger facilities are permitted as conditional uses.

c. Additional approvals, policies, or submittals. Not applicable.

9. Roadside agricultural stands.

a. Definition. A roadside agricultural stand is an accessory structure that is exclusively for the sale of agricultural, horticultural, or silvicultural products.

b. Standards. Not applicable.

c. Additional approvals, policies, or submittals. Not applicable.

20.430.070 Accessory Structures

A. *Purpose.* The purpose of this chapter is to provide the development standards by which accessory structures are regulated to assure (1) that these clearly remain subordinate and incidental to the primary use and buildings on the same lot; and (2) in combination with primary buildings do not result in undue crowding, restriction of access, or other adverse impacts on the site and surrounding property.

B. Standards. The following apply:

1. Detached accessory buildings. A detached building, accessory to any lot with one (1) or more residential units, may be constructed under one of the following criteria:

2. Overall. A detached building, accessory to a single family or duplex residence, may be constructed according to the requirements and regulations for a principal building and the building type (See Chapter 20.420 Building Types) associates with it, e.g., max impervious, setbacks, building height, etc.

3. Existing accessory structures may be converted to dwelling units even if they violate current code requirements for setbacks and/or max impervious.
4. Other. Additional Provisions for smaller buildings within setbacks. A detached building, accessory to a single family or duplex residence, may be constructed within the rear and/or side setbacks provided:
    a. The detached accessory structure does not exceed one hundred and twenty (120 SF) square feet in floor area and used for tool and storage sheds, play houses, or greenhouse and hothouses, and similar uses.
    b. No portion of the detached accessory building shall exceed eight (8') feet in height above grade, to roof peak.
    c. The detached accessory building shall not cover more than fifty (50%) percent of a required rear and/or side yard setback area.
    d. The nearest wall of the detached accessory building must be located a minimum of six (6') feet from the wall of any building. Eaves of adjacent buildings must be at least four (4') feet apart.
    e. Detached accessory buildings are subject to the Building Code provisions of Title 17.
    f. The detached accessory structure shall be located behind the front elevation of the primary structure.
5. Prior to primary structure completion. Accessory buildings shall not be permitted prior to the completion of the primary building/structure and/or permitted use on the same lot, or in the event that the primary building/structure/use ceases to exist.

20.430.080 Temporary Use Types and Standards

A. *Purpose.* The purpose of this chapter is to provide an administrative approval process whereby the city may permit uses to locate with the city on an interim basis without requiring full compliance with the development standards for the applicable zoning district, or by which the city may allow seasonal or transient uses not otherwise permitted.
    1. Respect for zoning district. It is not the intent of this chapter to provide a means to circumvent the strict application of the permitted uses in the zoning district. Time limits are to be strictly enforced.
    2. Location. All temporary uses addressed in this chapter shall be located outside of the public right-of-way.
B. Temporary Uses.
C. Exemptions.

1. Defined. The following activities are exempt from the requirements of this chapter, but shall comply with other substantive requirements of this chapter, unless specifically noted otherwise:
    a. Garage sale and yard sale lasting no longer than two (2) days;
    b. Christmas tree lots;
    c. Temporary sales office or model home either in a housing unit or in another temporary building for the purpose of facilitating the sale of homes to prospective buyers in any subdivision or planned development within this city under a permit issued by the building department;
    d. Storage of equipment during the construction of roads or development or job trailer associated with an active land use and/or building permit.

D. Other temporary uses.

1. The planning official may authorize a temporary use permit for a use not specifically listed herein.

E. Seasonal or special events.

1. Defined. This type of temporary use includes seasonal or special events which involve the placement of tents, canopies, membrane structures or storage containers.

F. Temporary storage units.

1. Defined. Temporary storage units are box-like containers used for storing household items that are being moved to another location or being stored during a home remodel projects. A temporary use permit is not required for a temporary storage unit, but must meet all standards in this chapter:
2. Placement Standards.
    a. On properties with single-family residences, the unit shall be placed in the driveway or other paved surface, not to extend into public right-of-way.
    b. On properties with multi-family residences, the unit shall be placed in a parking space. Not to extend into an aisle way or public right-of-way.
    c. Alternate location may be approved at the discretion of the City Planning Official, provided that the alternate location does not create an unsafe condition.
    d. A City street use permit shall be required for the placement of temporary storage units in a public right-of-way.
3. Duration of placement.
    a. Allowed up to thirty (30) days without a permit.
    b. Allowed up to ninety (90) days total with a land use permit.

c. Safety. Storage of flammable or hazardous material within temporary storage units is prohibited.

d. Signs. Signs on temporary storage units may only identify the owner or provider of the storage unit and not include advertisement of any other product or service.

4. Temporary uses in certain zoning districts.i

a. Defined. This type of temporary use includes a temporary trailer or prefabricated building for use on any properties in the MX, RA, IC, IE and HI Districts within the city as a temporary commercial or industrial office or space associated with the primary use on the property.

5. Unforseen/emergency situations.

a. Defined. This type of temporary use is one for which there is a need because of an unforeseen event such as fire, windstorm, flood or other event deemed by the planning official to be an emergency situation.

G. Approval Process.

1. Decision-making process. Temporary uses shall be reviewed by means of a Type I procedure unless waived by the planning official.

2. Effective period. An approval for a temporary use by the planning official shall be effective for a period of not more than one (1) year unless otherwise stipulated by the approval or renewed pursuant to this chapter.

3. Lapsing of approval. An approval for the temporary use by the planning official shall lapse if:

a. Substantial construction of the approved plan or onset of the approved activity has not begun within the approval period; or

b. Construction or activity on the site is a departure from the approved plan; or

c. The temporary use does not comply with approval criteria in this chapter.

4. Renewal of approval.

a. General. A temporary use approval may be renewed no more than twice (2X) by the planning official for a period not to exceed one (1) year each. The request for an extension shall be processed by means of a Type I procedure, as governed by VMC 20.210.040.

H. Submission Requirements.

1. General submission requirements. The applicant for a temporary use shall submit the following information:

a. Application form (including property owner’s signature) provided by the planning official for a Type I procedure.

b. Site plan drawn to scale that illustrates the proposed temporary use in relationship to other improvements on the site and showing how such use is in compliance with applicable development standards (setbacks, lot coverage, etc.).

c. Narrative that provides the information necessary to determine compliance with the relevant approval criteria contained in this chapter.

2. Emergency situations. The planning official may waive any of the requirements in this chapter for cases that involve destruction of an existing structure due to fire, natural causes or other circumstances that are beyond the control of the applicant. An emergency as allowed by this subchapter shall not include failure by the applicant to submit a temporary use request as provided in this chapter.

a. Approval Criteria.

i. The planning official shall approve a request for temporary use permit if the application satisfies the following criteria:

(A). The temporary use will not be materially detrimental to the public health, safety or welfare, nor injurious to property or improvements in the immediate vicinity;

(B). The applicant has proof of the property owner's permission to place the temporary use on the property;

(C). There will be no parking utilized by the customers and employees of the temporary use which is needed by the property owner to meet the minimum parking requirements, as governed by VMC 20.450.045.F Off-Street Parking Requirements;

(D). The temporary use will not interfere with adequate vision clearance, as governed by Chapter 20.450.060 VMC, Vision Clearance, and shall not obstruct pedestrian access on public rights-of-way;

(E). Conditions may be required by building official and/or fire marshal to determine compliance with minimum building, fire and life safety codes; and

(F). Adequate provisions for trash disposal and sanitary facilities shall be provided.

(G). The use will not create adverse off-site impacts including noise, odors, vibrations, glare or lights which will affect the adjoining uses as governed by Chapter 20.450.040 VMC, Off-Site Impacts.

(H). The use can adequately be served by sewer or septic system and water, if applicable.

(I). For seasonal and special events, the event occurs for no longer than thirty (30) days in a calendar year on the approved event site.

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CHAPTER 20.440
FRONTAGE TYPES

Sections:

20.440.010 Purpose.

20.440.020 Applicability.

20.440.030 Establishment of Frontage Types.

20.440.040 Frontage Type Requirements.

20.440.010 Purpose.

A. The purpose of this chapter is to introduce nine (9) frontage types. Frontage types offer a range of options for how a selected building type interacts with the street, shaping the overall character of the streetscape. For instance, shopfront and cafe frontage types are better suited for active and retail retail uses, while common yard and porch frontages are more appropriate for residential uses. The choice of frontage type, based on the building's intended use, plays a key role in defining the character of the public space it creates.

20.440.020 Applicability.

A. This chapter shall be applicable to all permit applications for new construction or major renovations on any lot applicable to Chapter 20.510 Active Ground Floor Use Overlay and are allowable per the overlay requirements of the assigned building type in Chapter 20.420 Building Types. A project may incorporate one (1) or more frontage types; however, in the event of a conflict between standards, the planning official may determine which frontage requirement applies.

20.440.030 Establishment of Frontage Types.

A. The frontage types include the following:

1. Awnings (AWN).
2. Balconies (BAL).
3. Bay Windows (BAY)
4. Cafe (CAF).
5. Common Yard (COM).

6. Courtyard (COU).
7. Porch (POR).
8. Stoop (STP).
9. Terrace/Light Court (TLC).

20.440.040 Frontage Type Requirements

A. Awnings

1. Description. A frontage type where the building is placed at or near the front property line, with a ground-floor entrance directly accessible from the sidewalk. A fixed or retractable awning or canopy projects from the façade over the sidewalk, providing shade and weather protection. Awnings are typically mounted above storefront windows and doors and are integral to pedestrian-oriented retail and commercial activity on the ground floor of buildings.

   Awnings may project over the build-to-line or into public rights-of-way.

IMAGE 20.440.040-1. AWNINGS



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2. Dimensional Requirements. Awnings must meet the dimensional requirements in Table 20.440.040-1. See Figures 20.440.040-1 and 20.440.040-2 for representative examples.

TABLE 20.440.040-1. AWNING DIMENSIONAL REQUIREMENTS

Facade Coverage	Minimum coverage of seventy-five (75%) of the primary building facade and must cover all windows and points of entry.
Facade Projection	Minimum depth of four (4') feet and maximum depth of eight (8') feet. Never more than five (5') feet into a public Right-of-Way.
Ground Clearance	Minimum clearance of eight (8') feet above the grade of the sidewalk.
Material Quality and Anchoring	Must be made of durable, weather-resistant materials and permanently anchored to the building facade.
Material Prohibition	Plastic or vinyl sheeting; reflective, fluorescent, or highly glossy materials; unfinished or untreated materials; and illuminated or back lit plastic may not be utilized.

FIGURE 20.440.040-1. AWNINGS STREET VIEW

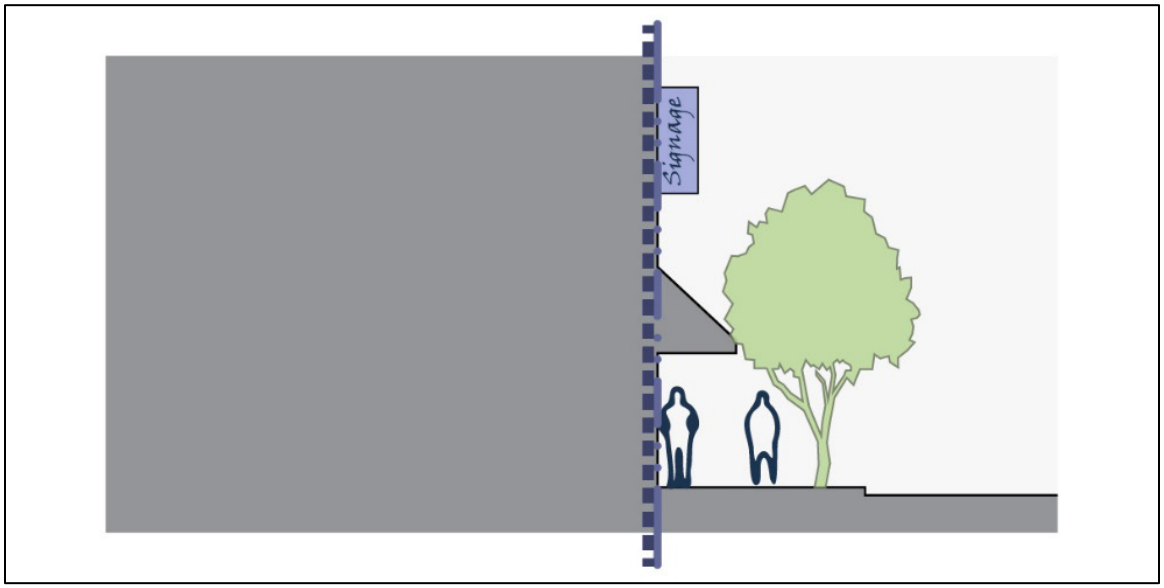
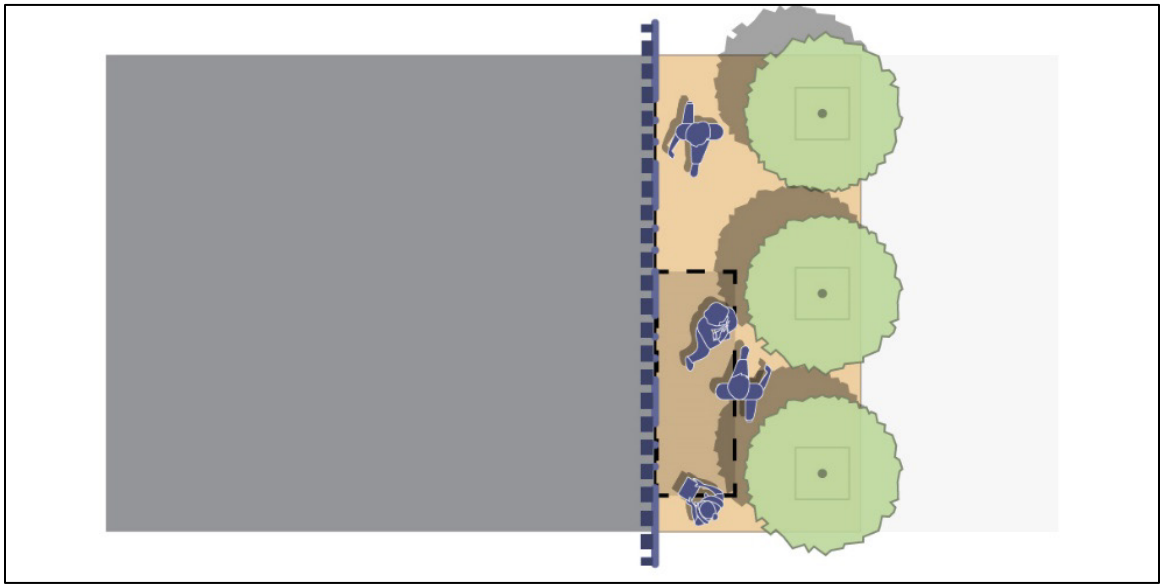


FIGURE 20.440.040-2. AWNINGS AERIAL VIEW



B. Balconies

1. Description. A frontage type with a platform that projects from the façade of a building above the sidewalk and are typically enclosed by a railing or balustrade, and accessible from an interior room. Balconies must remain unenclosed, non-conditioned spaces and may be roofed but not fully enclosed by walls or windows. Balconies are generally only allowed only on upper stories of mixed-use or residential buildings and may wrap around corner façades to address frontages on multiple streets.

   Balconies may project over the build-to-line or into public rights-of-way.

IMAGE 20.440.040-2. BALCONIES



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2. Dimensional Requirements. Awnings must meet the dimensional requirements in Table 20.440.040-2. See Figures 20.440.040-3 and 20.440.040-4 for representative examples.

TABLE 20.440.040-2. BALCONY DIMENSIONAL REQUIREMENTS

Facade Location	May be utilized on the second story or higher; and may not be utilized on the ground floor of any building type.
Facade Projection	Minimum depth of two (2') feet and maximum depth of six (6') feet. Never more than five (5') feet into a public Right-of-Way.
Ground Clearance	Minimum clearance of ten (10') feet above the grade of the sidewalk.
Material Quality and Anchoring	Must be made of durable, weather-resistant materials and permanently anchored to the building facade.
Material Prohibition	Plastic or vinyl sheeting; reflective, fluorescent, or highly glossy materials; unfinished or untreated materials; and illuminated or back lit plastic may not be utilized.

FIGURE 20.440.040-3. BALCONY STREET VIEW

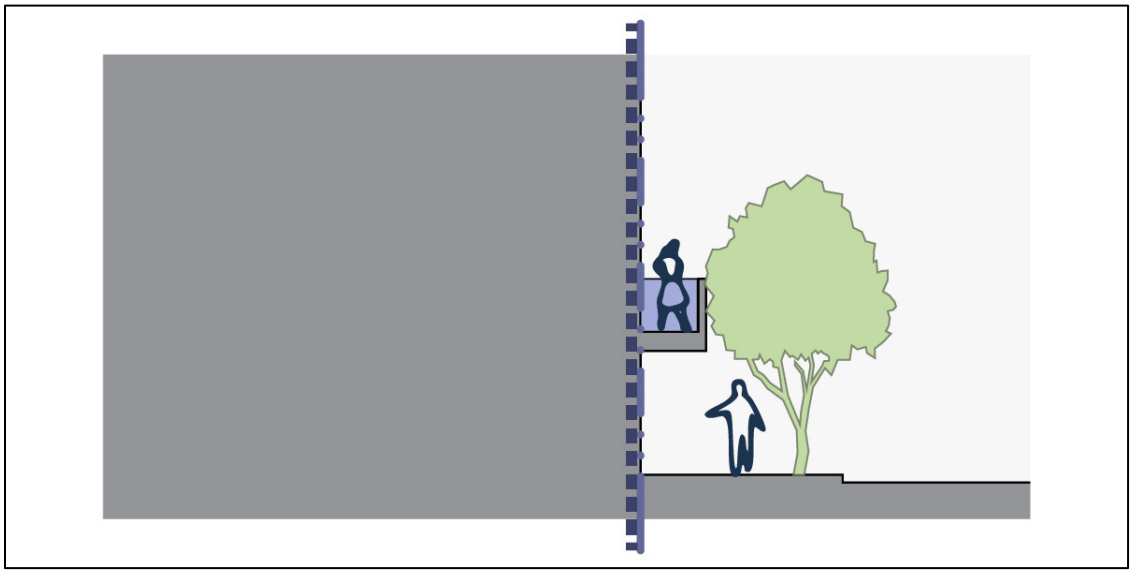
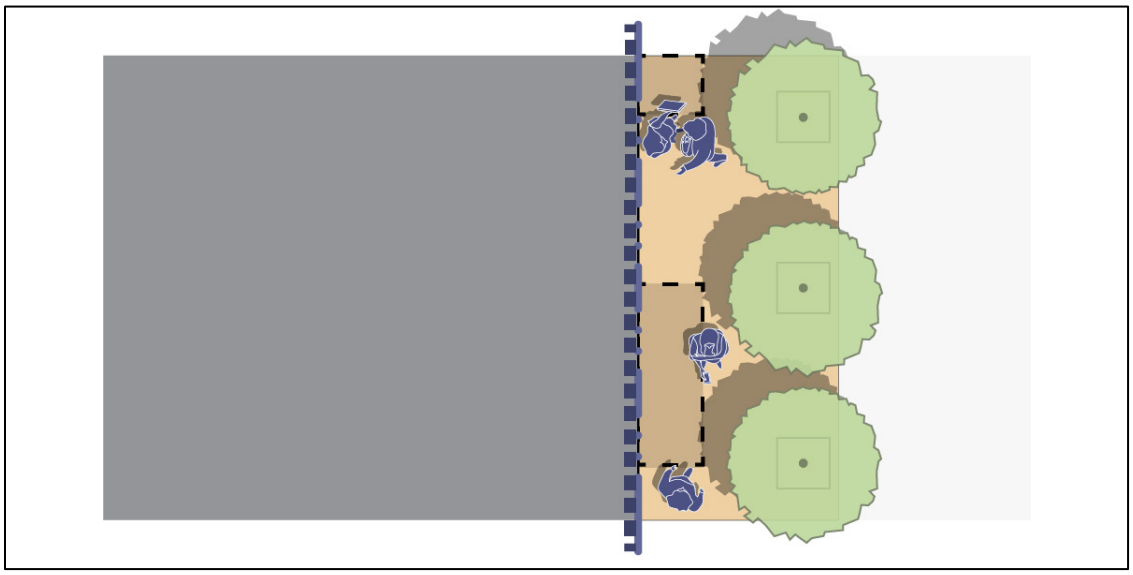


FIGURE 20.440.040-4. BALCONY AERIAL VIEW



C. Bay Windows

1. Description. A frontage type in which a window structure projects outward from the main facade of a building, forming a “bay” or alcove within the interior space. Bay windows are typically used on residential buildings and consist of a central window flanked by angled or perpendicular side windows, and they often provide expanded views, increased natural light, and additional interior floor area. They may be located on any story of a building other than the ground floor and may include architectural detailing such as trim, brackets, or roofing.

   Bay Windows may project over the build-to-line or into public rights-of-way.

IMAGE 20.440.040-3. BAY WINDOWS



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2. Dimensional Requirements. Bay Windows must meet the dimensional requirements in Table 20.440.040-3. See Figures 20.440.040-5 and 20.440.040-6 for representative examples.

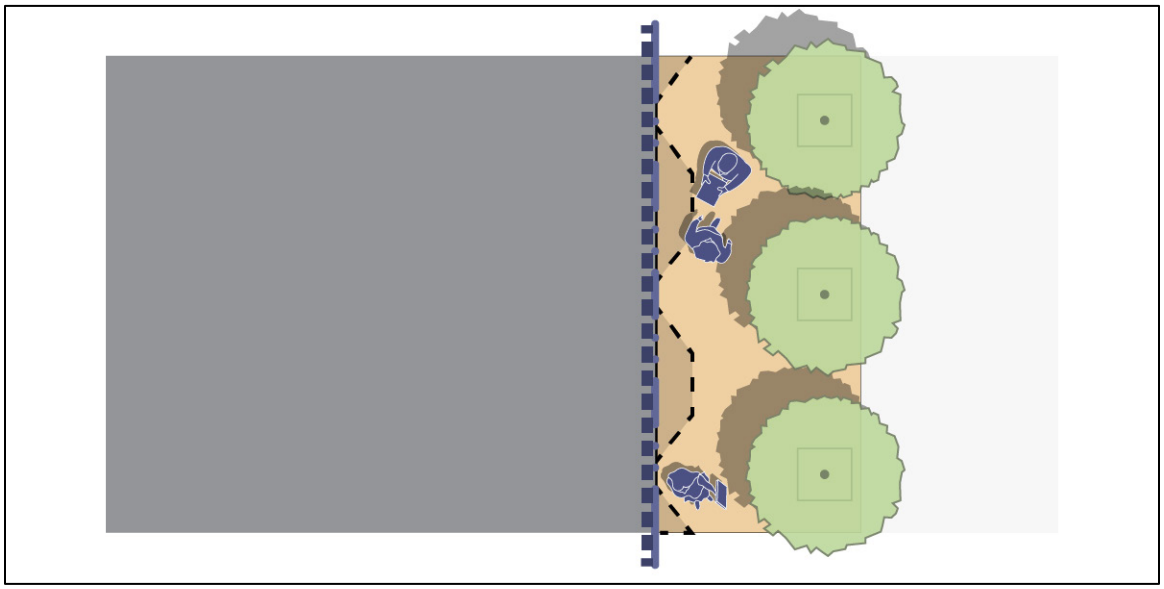
TABLE 20.440.040-3. BAY WINDOW DIMENSIONAL REQUIREMENTS

Facade Location	May be utilized on the second story or higher; and may not be utilized on the ground floor of any building type.
Facade Projection	Minimum depth of two (2') feet and maximum depth of four (4') feet.
Facade Width	Maximum width of ten (10') feet per bay window; minimum of four (4') feet between bay windows; no maximum number of bay windows.
Ground Clearance	Minimum clearance of ten (10') feet above the grade of the sidewalk.
Material Quality and Anchoring	Must be made of durable, weather-resistant materials and permanently anchored to the building facade.

FIGURE 20.440.040-5. BAY WINDOW STREET VIEW



FIGURE 20.440.040-6. BAY WINDOW AERIAL VIEW



D. Cafe

1. A frontage type tailored for storefronts that support outdoor seating for restaurants, cafés, and similar active commercial uses. Buildings are typically positioned at the build-to-line or very close, directly abutting the sidewalk to encourage pedestrian interaction with seating areas. Café frontages often include roll-up or bi-fold doors that open the interior to the street and may feature either covered or open-air seating areas which add depth to the building facade. Often combined with courtyard frontage and awning frontage.

Café elements as part of this frontage type may encroach into the public rights-of-way but may never impede the sidewalk.

IMAGE 20.440.040-4. CAFE



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2. Dimensional Requirements. Cafe must meet the dimensional requirements in Table 20.440.040-4. See Figures 20.440.040-7 and 20.440.040-8 for representative examples.

TABLE 20.440.040-4. CAFÉ DIMENSIONAL REQUIREMENTS

Sidewalk Zone	Must maintain a six (6') foot sidewalk zone for pedestrians at all locations and access to entrances. Sidewalk zone may separate portions of the cafe.
Barrier Projection	May project up to six (6') feet from the facade of a building when connected. No requirements for cafe spaces that do not project into public rights-of-way.
Barrier Dimensions	Minimum of thirty-six (36") inches and maximum of forty-two (42") inches tall; minimum of two (2") inches thick.
Barrier Access/Egress	Minimum of thirty-six (36") inches wide.
Barrier setback from the Curb or utilities	Minimum of eighteen (18") inches setback from any curb to allow door clearance for vehicles or access to any utilities such as streetlights, fire hydrants, tree wells, and other utility boxes.
Overhead Clearance	Any awnings, canopies, umbrellas or other elements that impede the sidewalk zone must have a minimum clearance of eight (8') feet for pedestrians.

FIGURE 20.440.040-7. BAY WINDOW STREET VIEW

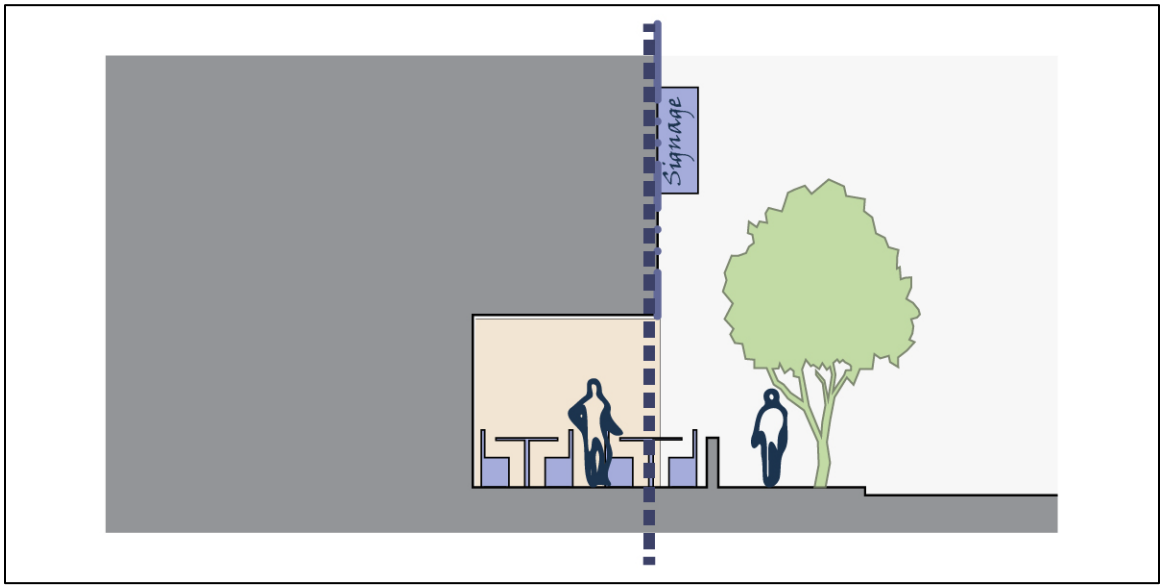
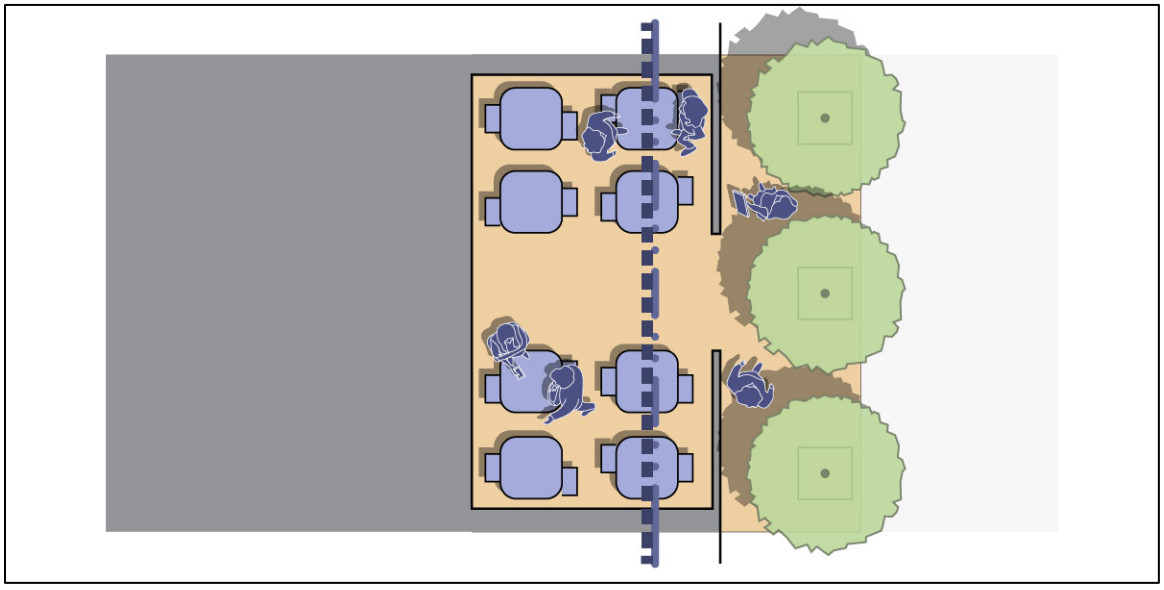


FIGURE 20.440.040-8. CAFE AERIAL VIEW



E. Common Yard

1. A frontage type characterized by a building facade set back from the front lot line, creating a common yard that contributes to a cohesive streetscape. This yard may be either defined or open, fenced or unfenced, and typically blends visually with adjacent yards. Common yards may incorporate entry features such as canopies or vestibules and can be combined with other frontage types where appropriate. The yard may either slope gradually from the sidewalk or be elevated with a retaining wall and entry steps.

   Common Yards do not have any elements that project over the build-to-line into public rights-of-way.

IMAGE 20.440.040-5. COMMON YARD



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2. Dimensional Requirements. Common Yards must meet the dimensional requirements in Table 20.440.040-5. See Figures 20.440.040-9 and 20.440.040-10 for representative examples.

TABLE 20.440.040-5. COMMON YARD DIMENSIONAL REQUIREMENTS

Terracing and Retaining	Lots with elevation changes of greater than three (3') feet must utilize stepped terracing or retaining walls to mitigate steep slopes.
Fencing Dimensions	If fencing is provided in front or side yards, it must be a minimum of two (2") inches thick and maximum of forty-two (42") inches tall.
Fencing Materials	If fencing is provided, it must be made of durable, permanent materials such as wood, composite wood, wrought iron, decorative metal, masonry, or other long-lasting materials.
Lot Buffering Width	A landscape buffer along side lot lines that is a minimum of three (3') feet in width when mature landscaping is required per Section 20.450.035 VMC.
Lot Buffering Height	A landscape buffer along side lot lines that is a minimum of six (6') feet in height when mature landscaping is required per Section 20.450.035 VMC.

FIGURE 20.440.040-9. COMMON YARD STREET VIEW

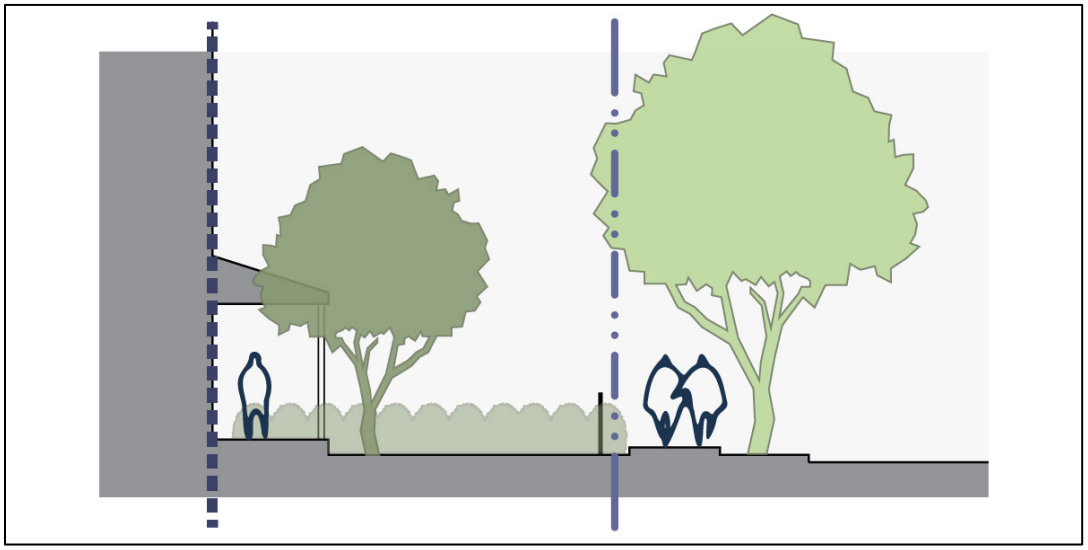
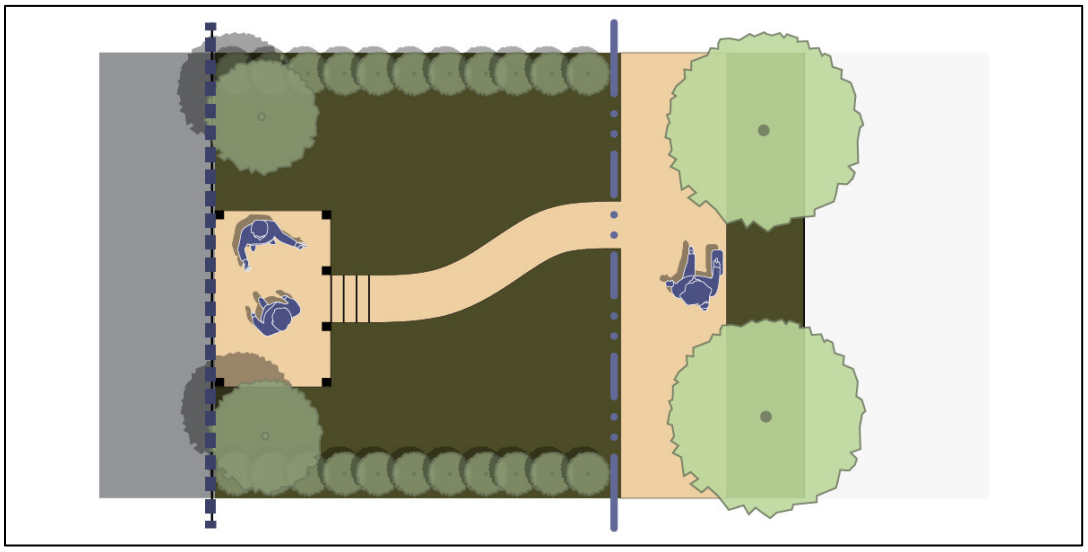


FIGURE 20.440.040-10. COMMON YARD AERIAL VIEW



F. Courtyard

A frontage type characterized by a building facade positioned at or near the build-to-line, with a recessed area that forms a forecourt. This open-air space serves as a semi-private or public transition zone and may be used as an entry plaza, shared garden for residential buildings, expanded seating for retail or dining establishments, or, in some cases, a small vehicular drop-off area. Forecourts should include a balanced combination of paving and landscaping to enhance usability, visual interest, and pedestrian comfort.

Courtyards do not have any elements that project over the build-to-line into public rights-of-way.

IMAGE 20.440.040-6. COURTYARD



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1. Dimensional Requirements. Courtyards must meet the dimensional requirements in Table 20.440.040-6. See Figures 20.440.040-11 and 20.440.040-12 for representative examples.

TABLE 20.440.040-6. COURTYARD DIMENSIONAL REQUIREMENTS

Facade Coverage	Maximum coverage of fifty (50%) percent of any building facade.
Minimum Dimensions	Minimum dimensions of ten (10') feet by ten (10') feet.
Maximum Dimensions	Maximum of fifty (50') feet deep on any lot.
Hardscaping and Landscaping	Should be a balance of paved areas and landscaped areas depending upon use.
Fencing and Wall Dimensions	When provided should be no less than two (2") inches thick and forty-two (42") inches tall.
Fencing and Wall Materials	When fencing or walls are provided, they must be made of durable, permanent materials such as wood, composite wood, wrought iron, decorative metal, masonry, or other long-lasting materials.
Accessibility from the Street	When controlled, gate access is provided, it must have a width no less than three (3') feet wide.

FIGURE 20.440.040-11. COURTYARD STREET VIEW

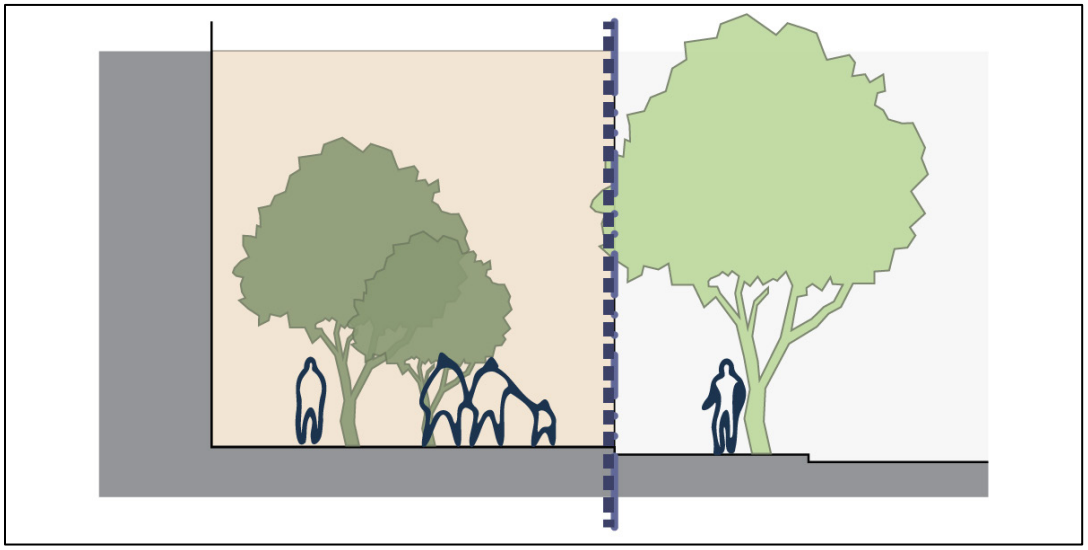
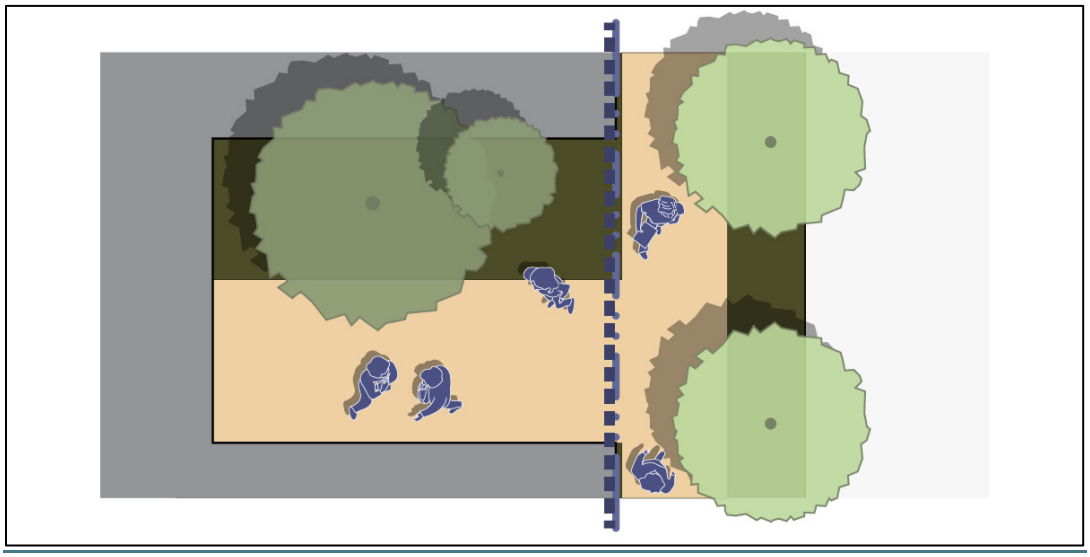


FIGURE 20.440.040-12. COMMON YARD AERIAL VIEW



G. Porch

1. A frontage type most commonly associated with detached single-family homes, though it may be applied to other building types based on context. Porches must remain unenclosed, open-air spaces and may not be screened or air-conditioned. Typically limited to a single story in height, porch widths and lengths may vary to suit the architectural style. Porches must be elevated to match the interior finished floor level, providing a seamless and inviting transition between the public sidewalk and the building entrance.

   Porches may project over the build-to-line but never into public rights-of-way

IMAGE 20.440.040-7. PORCH



Image is advisory only

2. Dimensional Requirements. Porches must meet the dimensional requirements in Table 20.440.040-7. See Figures 20.440.040-13 and 20.440.040-14 for representative examples.

TABLE 20.440.040-7. PORCH DIMENSIONAL REQUIREMENTS

Facade Coverage	Minimum coverage of sixty (60%) percent of the building facade.
Minimum Depth	Minimum clear depth of six (6') feet.
Maximum Height	Minimum clear height of eight (8') feet from floor to ceiling.
Floor Level Requirement	Porch level must match the finished floor level of the first floor of the building.
Stair Dimensions	Stairs up to a porch may be no less than six (6') feet wide.
Enclosure Prohibition	Porches may not be enclosed or conditioned.

FIGURE 20.440.040-13. PORCH STREET VIEW

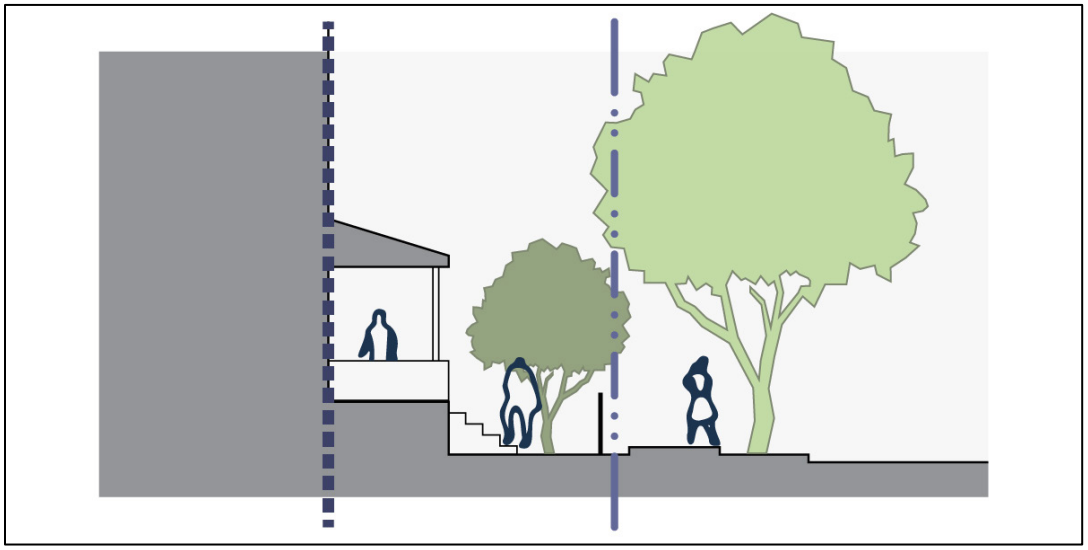
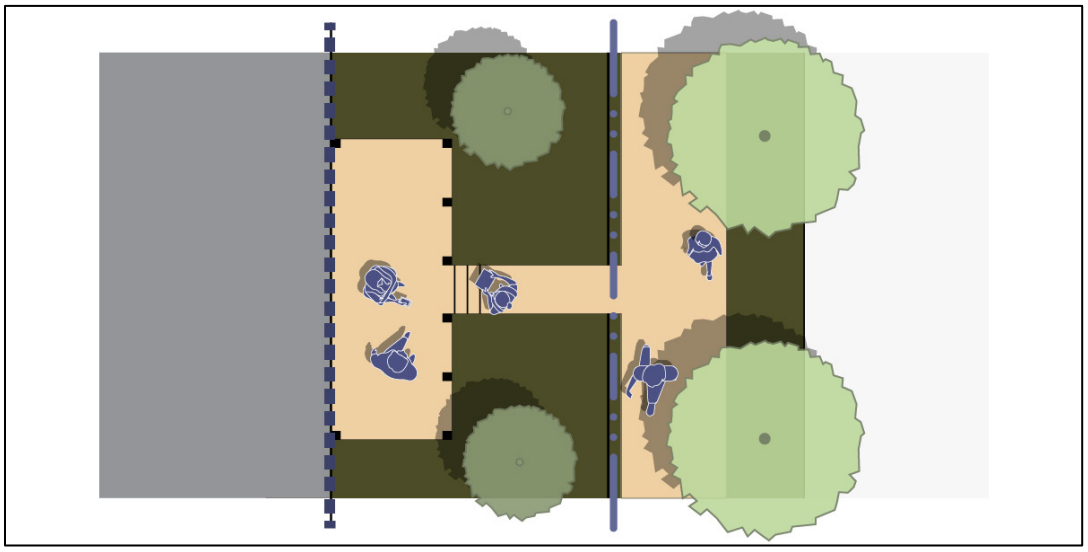


FIGURE 20.440.040-14. PORCH AERIAL VIEW



H. Stoop

1. A frontage type where the building facade is positioned close to the front property line, with the ground floor elevated above the sidewalk to provide privacy for windows and front rooms. A stoop, typically consisting of an exterior stair and landing, connects the building to the sidewalk in front of the build-to-line. The stoop is elevated, and the stairs can either lead directly to the sidewalk or be side-loaded. The stoop may also feature a roof for additional coverage. Stoops can be at grade or raised to facilitate the transition into the building.

   Stoops may project over the build-to-line but never into public rights-of-way

IMAGE 20.440.040-8. STOOP



Image is advisory only

2. Dimensional Requirements. Stoops must meet the dimensional requirements in Table 20.440.040-8. See Figures 20.440.040-15 and 20.440.040-16 for representative examples.

TABLE 20.440.040-8. STOOP DIMENSIONAL REQUIREMENTS

Locational Requirement	No portion of stoop may be within twenty-five (25') feet of two intersecting streets.
Facade Coverage	Maximum coverage of forty (40%) percent of building facade.
Minimum Depth	Minimum depth of six (6') feet.
Minimum Width	Minimum width of six (6') feet.
Maximum Height	Maximum height of stoop above sidewalk must be five (5') feet or less.
Stair Dimensions	Stairs as part of a stoop may be no less than six (6') feet wide.

FIGURE 20.440.040-15. STOOP STREET VIEW

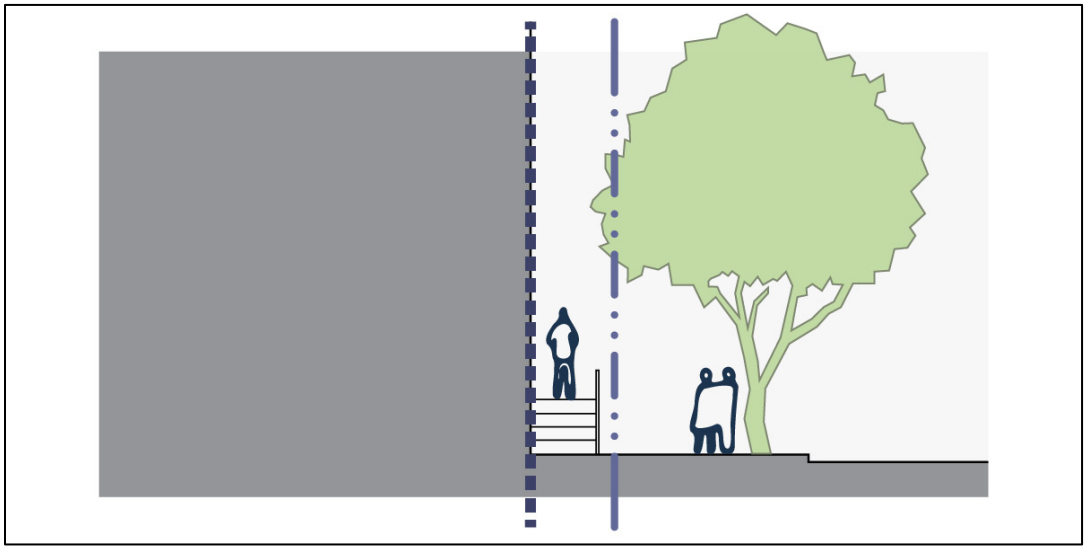
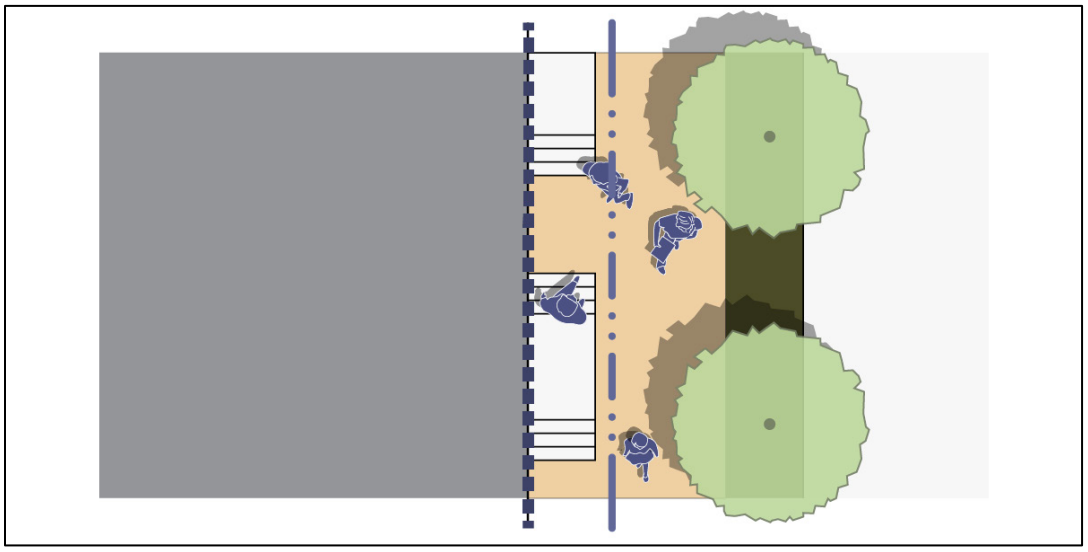


FIGURE 20.440.040-16. STOOP AERIAL VIEW



I. Terrace/Lightcourt

1. A frontage type characterized by a partial setback of the building facade to accommodate either an elevated terrace and a sunken light court. This configuration creates a transitional space that buffers private residential or lower-level commercial uses from the public sidewalk while preserving a clear distinction between public and private realms. Elevated terraces support outdoor café seating and lively street interaction, while sunken light courts bring daylight and access to lower-level spaces like sub-basements or garden levels.

Terrace/lightcourts do not have any elements that project over the build-to-line into public rights-of-way.

IMAGE 20.440.040-9. TERRACE/LIGHTCOURTS



Image is advisory only

2. Dimensional Requirements. Terrace/lightcourts must meet the dimensional requirements in Table 20.440.040-9. See Figures 20.440.040-17 and 20.440.040-18 for representative examples.

TABLE 20.440.040-9. TERRACE/LIGHTCOURTS DIMENSIONAL REQUIREMENTS

Locational Requirement	No portion of a terrace or lightcourt may be within twenty-five (25') feet of two intersecting streets.
Facade Coverage	Maximum coverage of twenty-five (25%) percent of building facade for any lower-level portions of the lightcourt.
Maximum Height of the Terrace	No terrace may be higher than five (5') feet above the adjacent sidewalk.
Stair Dimensions	Stairs up to a terrace or down to the lightcourt may be no less than six (6') feet wide.
Roofs or Coverings	Minimum clearance of eight (8') feet above the grade of the terrace level, the lightcourt level, or any stairs connecting them.
Walls and Railings	Any wall or railing for a terrace must be at least thirty-six (36") tall and two (2") inches thick.
Landscaping Area	Lower level lightcourts may have landscaping, planters, and other greenery as necessary to support the use.

FIGURE 20.440.040-17. TERRACE/LIGHTCOURTS STREET VIEW

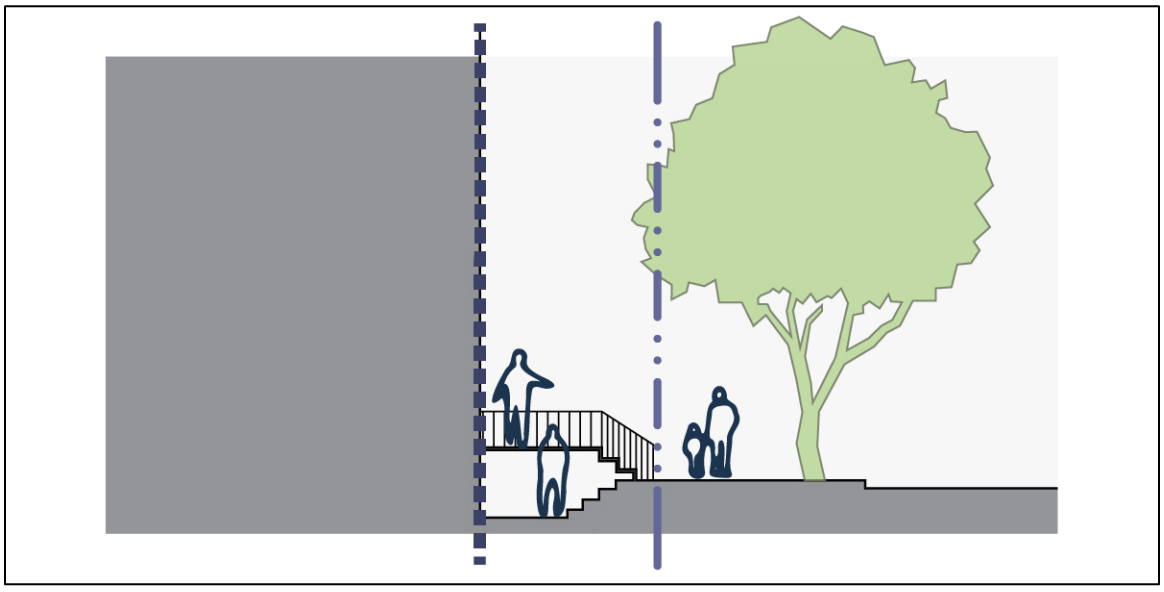
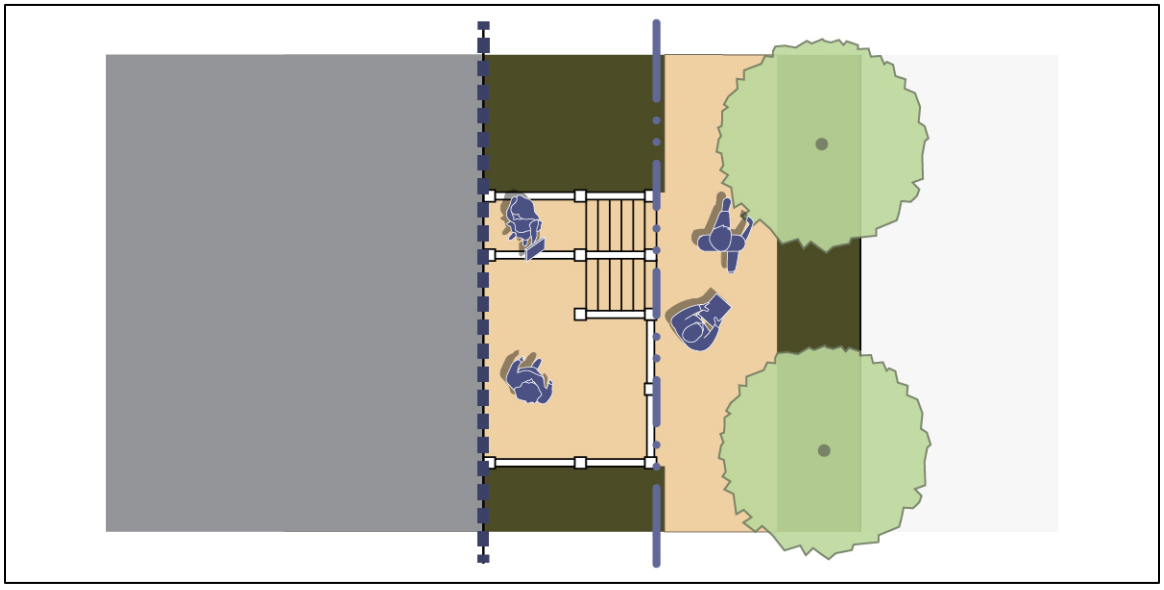


FIGURE 20.440.040-18. TERRACE/LIGHTCOURTS AERIAL VIEW



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CHAPTER 20.450
ADDITIONAL DEVELOPMENT STANDARDS

Sections:

20.450.010 Escrow and Assurances.

20.450.015 Exceptions and Interpretations.

20.450.020 Fences and Walls.

20.450.025 Gated Access Standards.

20.450.030 Impact Fees.

20.450.035 Landscaping and Tree Conservation.

20.450.040 Off-Site Impacts.

20.450.045 Parking and Loading Revised.

20.450.050 Signs.

20.450.055 Solid Waste Disposal and Recycling.

20.450.060 Vision Clearance.

20.450.065 Essential Public Facilities.

20.450.070 Dark Sky Outdoor Lighting Requirements.

20.450.075 Wireless Communication Facilities Standards.

20.450.080 Cottage Cluster Dwelling

20.450.085 Manufactured Home Development

20.450.010 Escrow and Assurances

A. *Purpose*. To provide flexibility in the construction of certain private improvements associated with approved developments, this chapter establishes the circumstances under which the Planning Official may allow a delay in construction of certain required private improvements by use of an escrow or other form of security acceptable to the City to assure that such private improvements are constructed within a specified timeline and in accordance with approved standards.

B. *Provisions*.

1. The Planning Official may delay construction of certain required private improvements beyond certificate of occupancy provided it is determined that good cause has been shown by the applicant. Where mitigation for environmental impacts has not been completed prior to the City final permit approval (such as final plat approval or final building inspection) and is therefore required as a condition of final permit approval, good cause shall be deemed to exist.

2. *Guarantee for provision of private improvements.* On all projects where private improvements are required, the Planning Official may require an escrow or other form of security acceptable to the City in an amount not less than one hundred (100%) percent of the cost of the improvements that secures and provides for the actual construction and installation of the improvements required as condition(s) of approval for the development. The use of escrow or other form of security shall be limited to:

   a. Approved private transportation system improvements, including sidewalks and streetlights, provided emergency access improvements are constructed on-site as needed;

   b. Approved private stormwater collection and management facilities;

   c. Approved landscaping and trees to meet minimum on-site tree density or landscaping requirements, including installation and maintenance costs.

   d. Approved fences and walls.

   e. Approved mitigation for environmental impacts, including but not limited to, construction, maintenance, and monitoring to ensure that mitigation is fully functional.

C. *Requirements*.

1. The applicant shall request approval of an extension on the construction of private improvements listed in Subsection B above by means of a Type I permit, pursuant to Section 20.210.040. Such request shall state the remaining improvements not yet constructed, the reasons for a requested delay, and requested timeline for improvements to be made. The request shall be accompanied by a draft escrow agreement or other security acceptable to the City.

2. Each escrow or other form of security acceptable to the City request shall include the following:
    a. A scheduled cost breakdown for project work to be completed presented as Exhibit A, an escrow agreement shall not be accepted without an approved unit cost breakdown for the remaining improvements.
    b. The draft escrow agreement in a form provided by the City.
    c. An irrevocable license signed by the owner of subject property to run with the property which provides the City with the right to allow the employees, agents or contractors of the City to go on the subject property for the purpose of inspecting and, if necessary, doing the work or making the improvements covered by the escrow or other form of security acceptable to the City.
    d. Any other documents deemed necessary by the City.
    e. Applicable processing fee as contained in Chapter 20.190 VMC, Fees.
3. *Failure to carry out agreement.* In the event the applicant fails to carry out provisions of the agreement and the City has un-reimbursed costs or expenses resulting from such failure, the escrow or other form of security acceptable to the City shall be forfeited and the money shall be paid to the City to defray its costs. If the amount of the escrow or other form of security acceptable to the City exceeds the cost and expense incurred by the City, the City shall release the remainder, and if the amount of the escrow or other form of security acceptable to the City is less than the cost and expense incurred by the City, the applicant shall be liable to the City for the difference.

D. *Release of escrow or security.* Upon completion of required improvements, the applicant shall request in writing that the Planning Official release all or a portion of the funds held in escrow. Such improvements shall be inspected and accepted as complete by the City prior to the release of any such escrow funds, or portion thereof.

20.450.015 Exceptions and Interpretations

A. *Purpose*. The Planning Official has the authority to make exceptions to and interpretations of the provisions in this Title per the process outlined in Chapter 20.255 VMC. From time to time, the Planning Official is directed to codify those exceptions and interpretations that have broad applicability. The purpose of this chapter is to provide a place where these interpretations can be codified.

B. Lot Dimensions and Coverage for Building Types. *Pre-existing legal lots*. If any lot, legally platted at the time of its creation, or the aggregate of such contiguous lots or land parcels held in single ownership has an area or dimension less than required by lot dimensions and coverage for the building type proposed for the property, the lot or aggregate holdings may be occupied by any permitted use in the district subject to compliance with all other requirements of the district and building type including the building placement and buildout requirements thereof; provided, however, that the use of a lot in a zoning district which allows for residential uses has an area deficiency shall be limited to one (1) single-family dwelling. All lots shall have a minimum of sixteen (16) feet of access to a public or private street, or access easement. Single ownership of abutting parcels shall not affect the right of the Planning Official to approve development of the single lot that has an area deficiency.

C. Height Limitations on Building Types.

1. *Exceptions*. Except for the Airport Height Overlay District, maximum height limitations set forth in the zoning districts in Chapter 20.410 of this Title shall not apply to the following:

   a. Barns, silos, water towers and tanks, or other farm buildings and structures, provided they are not less than fifty (50') feet from every lot line; and

   b. Chimneys, church spires, belfries, cupolas, domes, smokestacks, flagpoles, grain elevators, cooling towers, solar energy collectors, monuments, fire house towers, masts, aerials, elevator shafts, street lights, power or communication distribution lines, and other similar projections;

D. Build-to-Line and Setback Requirements for Building Types.

1. *Projections into required yards.* Certain architectural features on Building Types proposed for a lot may project into required yards or courts as follows:

   a. Cornices, canopies, eaves, belt courses, bay windows, sills or other similar architectural features, or fireplaces not including floor extensions may extend no more than twenty-four (24") inches into any required yard area.

   b. Fire escapes, open-uncovered porches, balconies, or outside stairways may extend no more than eighteen (18") inches into any required side build-to-lines (side street) side yard setback (adjacent lots), or rear yard setback (adjacent lot or alley), and no more than six (6') feet into any required front build-to-lines (primary street). Open porches, decks or stoops not exceeding eighteen (18") inches in height may extend no closer than eighteen (18") inches to any lot line.

   c. Any component of a frontage type, when required by this title.

2. Exceptions to primary street requirements for Building Types.

   a. If there are legally established structures on both abutting lots with front build-to-lines less than the required depth for the district, the front build-to-line for the lot need not exceed the average front build-to-lines of the abutting structures.

b. If there is a legally established structure on one (1) abutting lot with a front build-to-line less than the required depth for the district, the front build-to-line need not exceed a depth of halfway between the depth of the build-to-line on the abutting lot and the required front build-to-line depth.

3. *Flag lots.* The building placement and buildout requirements for flag lots may be reduced upon review and approval of the Planning Official; provided, that no build-to-line or setback is less than five (5') feet.

4. Exception for existing setbacks. Additions to legally established building floor area may be continued along existing setback lines so long as a minimum setback of three feet is maintained. This provision does not allow additional building height.

E. Building Types with Zero Lot Line Development.

Conditions under which permitted. The following conditions shall exist before any building permit is issued for a Building Type with zero lot line development:

1. *Side setback line (adjacent lot).* The setback on the adjacent lot to the zero setback side yard lot shall be either zero (0) or at least five (5) feet.

2. *Covenants.* Covenants running with the land, approved by the City Attorney, which guarantee that the opposite side setback line (adjacent lot) of not less than five (5) feet shall be kept perpetually free of permanent obstructions, shall be filed with the deed(s) or noted on a plat.

3. Building Walls.

a. The building wall on the zero-foot side setback line (adjacent lot) shall be constructed of window-free, fire resistive construction per the Building Code standards of Title 17, no portion of which shall project over any property line. The construction shall be subject to review by the Building Official.

b. Covenants running with the land, approved by the City Attorney, shall convey a four (4) foot maintenance easement with a one and one-half (1-1/2) foot encroachment into the easement provision, in order to permit variations in design from the adjoining lot. No windows shall be allowed along this wall in any case.

c. Zero lot line (common-wall) construction may be permitted, provided adjoining walls are fire-resistive and constructed according to the standards of sound transmission, per the Building Code standards of Title 17. Common walls must be attached a minimum 60% of the length of the entire building wall.

4. *Exception.* Zero lot line development standards do not apply to free-standing fences and/or walls that are not directly connected to a roof structure.

20.450.020 Fences And Walls

A. *Purpose*. The purpose of this chapter is to establish standards for fences, walls and sound walls constructed in the City of Vancouver whether individually or included with a Building Type per Chapter 20.420 Building Types.

B. *Applicability*. This section applies to all fences and walls not a part of a building, including retaining walls and sound walls constructed in the City of Vancouver. Special standards are established for gated access communities in Section 20.450.025 VMC, Gated Access Standards.

C. *Permits required.*

1. *Land Use Permits.* Type I site plan approval is required for any sound wall. No land use permit is required for other wall or fence; however the standards of this chapter shall apply, unless exempted by VMC 20.450.020D.

2. *Building Permit.* Building permits are required for all fences over six (6') feet in height. Building permits are also required for walls four (4') feet or over and for walls which support additional weight from a building or parking area.

D. Exemptions.

1. This chapter does not apply to fences or walls thirty (30") inches or less in height, measured from grade, unless such a wall is structurally supporting additional weight from a building or parking area.

2. Hedges located in a vision clearance triangle must be maintained at a height of thirty (30") inches or less measured from street grade. All other hedges within private property are not regulated by this title.

E. Location and Height of Fences and Walls.

1. Fences and walls must be wholly contained on the applicant’s property, or located on a property line when both abutting property owners are in agreement.

2. Fences and walls must not be placed in any manner to hinder access to an easement.

3. In the LS, MS, and MH zoning districts, fences that are streetward of the front wall of the house in front build-to-line (primary streets) shall be limited to five (5) feet in height, so long as the top one (1) foot is constructed to be at least eighty (80) percent open to views (e.g., wrought iron, chainlink, etc.). In other required side build-to-lines (side streets), side yard, and rear yard setbacks areas, solid fences shall be limited to six (6) feet in height. See exceptions for sound walls at 20.450.020(G).

4. In the MX, RA, IC, IE, HI, PO, and NA zoning districts , fences within the required setback area are limited to six (6) feet in height. See Exception for sound walls at 20.450.020(G).

5. Land Use Permits cannot be issued for fences or walls that are in the public right-of-way.
6. Fences and walls shall not interfere with vision clearance at an intersection of roads or driveways. Fences and walls under thirty (30) inches in height are generally allowed in a vision clearance triangle unless the topography causes a restriction of clear vision. Fences that are eighty (80) percent open (such as wrought iron and chain link) are allowed in a vision clearance triangle when maintained in a manner that is clear of vegetation that could restrict clear vision.

F. Prohibited Fences and Fencing Material.

1. Barbed wire, razor wire and electrically charged fences are not permitted as accessory to residential uses in any zoning district.
2. Within the IC, IE, HI, PO, and NA zoning districts, barbed wire and razor wire are only allowed as the top to a security fence accessory to permitted non-residential uses. In these cases, two (2) feet of such wire can be attached to the top of a six (6) foot wall or fence, as long as it is vertical or angled in toward the enclosure.
3. Barbed wire, razor wire, and electrically charged fences are prohibited in the MX and RA zoning districts.

G. Sound Walls. When sound walls are required to mitigate sound impacts for properties located adjacent to a railroad right-of-way, state highway, or where Residential Uses abut Primary Retail Uses, Secondary Retail Uses, Office Uses, or Industrial Uses, the Planning Official may approve a sound wall which exceeds the height limit of 20.450.020(E) up to maximum of eight (8) feet if the following criteria are met:

1. *Landscaping.* Exterior walls facing a street or highway shall be landscaped with groundcover, shrubs, vines, mounds and trees such that at least fifty (50) percent of the height of the wall shall be screened from the adjacent public street within two (2) years.
2. *Type of Wall.* Walls shall be constructed of graffiti-resistant solid brick or other material that requires minimum maintenance. A textured surface treatment that is compatible with and appropriate to the area for which it is proposed shall be provided.
3. *Walls between properties.* All property owners shall agree on the height and type of wall prior to approval from the City.
4. *Height of Walls.* Walls may exceed eight (8) feet in height, to a maximum of twelve (12) feet, provided they are adjacent to a public right-of-way as outlined above, and based on an approved noise study prepared by a licensed acoustical engineer that demonstrates the additional height is necessary in order to reduce noise levels at the property line to sixty-five (65 dBA) A-weighted decibels. An approved noise study shall include an analysis of potential impacts of sound transfer as a result of construction of a proposed wall.

5. The Planning Official may deny a request for a sound wall if it is determined that the proposed height and/or materials of the wall would not be in keeping with the visual character of surrounding properties, or that such placement would create a threat to public health and safety.

20.450.025 Gated Access Standards

A. *Purpose*. The standards for Gated Access are provided here as a Type I review as authorized at 20.210.020(B)(1). These standards are intended to implement safe ingress and egress while promoting visual attractiveness and site security.

B. Permit and Development Standards.

1. *Land use permit required.* A land use permit is required for any gate across an access driveway, unless exempted by 20.450.025(B).

2. *Exemptions*. The permit and development standards of 20.450.025 shall not apply for the following: any use where the gate will remain open during business hours, or any residential gate for secondary driveway to be used exclusively for access to RV, boat or similar vehicle parking area.

3. *Development standards*. A detailed site plan shall be submitted with the Type I application which depicts the access point(s) and demonstrates all of the following required elements:

a. *Stacking area.* Each access point shall show an area of sufficient length and width to safely stack traffic coming onto the property from the adjacent roadway. Transportation Services shall determine the length of the stacking area based on the adjacent roadway type and design configuration. A parking area shall be provided to the right of the entry lane to accommodate visitors not able to open the gate.

b. *Entrance/Exit Design.* Adequate vision clearance shall be provided so that motorists leaving a gated community have a clear view of the sidewalk on either side of the exit, and so that approaching pedestrians have a clear view of any approaching vehicle. Gated community entrances and exits shall be designed to achieve travel speeds not to exceed 5 miles per hour, and shall require a vehicle stop directly prior to crossing the street sidewalk. Entrance and exit areas shall be designed so that vehicles approaching or leaving the gated community can queue to enter/exit the traffic stream without blocking the sidewalk.

c. *Turnaround feature.* Each gate access point shall have an area that allows traffic to safely maneuver a turnaround when the gate is in closed position.

d. *Lane width inside the gate.* Fire and emergency access vehicles require passing room within the development. Twenty feet of unobstructed driving surface is required on the interior side of the access point and gate.

e. *Emergency vehicle access required.* Each project will require the applicant to produce a confirmation of approval from the Fire Marshal that indicates that the design of the gate(s) meets the Fire Marshal's requirements for emergency entry. The Fire Marshal's written approval shall be submitted with this application.

f. No encroachment into publicly owned right-of-way. The gates, operating equipment and fencing shall be located wholly within the private portion of the property. The property line shall be clearly indicated on the site plan. Swing gates are not allowed to encroach into the public right-of-way. The drives, streets and lanes inside a gated community are to remain private.

g. *Pedestrian Access.* Separate pedestrian access from driving lanes. Each access point shall have a pedestrian access and walkway that is separate from the driving lanes and links directly to the public sidewalk. Pedestrian walkways shall meet all standards for accessibility required by the Americans with Disabilities Act.

h. *Lighting.* Lighting fixtures shall be established and maintained at the access points to provide vehicle and pedestrian safety. The required lighting shall be automatically controlled to turn on during the hours of darkness and shall adhere to Section 20.450.070 VMC, Dark Sky Outdoor Lighting Requirements, of this code.

i. *Vision Clearance.* Each access point shall demonstrate vision clearance as per 20.450.020 VMC.

j. *Gate Material.* The moving portion of the gate shall be constructed of material that is at least eighty (80) percent open. Typically, wrought iron or other decorative material is used.

k. *Gate opening width.* Each gate must open to a minimum width of fifteen (15) feet or as required by the Fire Marshal.

20.450.030 Impact Fees

A. *Purpose.* It is the purpose of this chapter to ensure that adequate facilities are available to serve new growth and development, and to promote orderly growth and development by requiring that new development pay a proportionate share of the cost of new facilities needed to serve growth. In addition, it is also the purpose of this chapter to ensure that impact fees are imposed through established procedures and criteria so that specific developments do not pay arbitrary fees or duplicate fees for the same impact.

B. Applicability.

1. *Uniform applicability.* This chapter shall be uniformly applicable to development that occurs within a designated service area or overlay service areas.

2. *For pre-development permit issuance.* No building permit shall be issued for a development in a designated service area or overlay service area as defined in this chapter unless the impact fee is calculated and paid pursuant to this chapter.
3. For new development requiring a building permit the impact fee(s) shall be calculated at time of building permit application. Impact fees shall be due and payable at the time the building permit is issued except as provided in VMC 20.450.030. Notwithstanding the foregoing, all impact fees shall be recalculated for building permit applications that have not been issued within one year.
4. *For development not requiring a building permit.* For development not requiring a building permit (e.g., approval of a change in use of a building or land), the impact fee shall be calculated and imposed at the time of the associated development approval.
5. *For manufactured homes or home developments.* For manufactured home or home developments, the impact fee shall be calculated and imposed at the time of site plan approval.
6. All impact fees shall be calculated using the impact fee rates in effect at the time of calculation.

C. Establishment of Development Service Areas.

1. *General.* Service areas, which may vary by type of public facility, are established as shown on the Park Impact Fee Technical Document and Vancouver Transportation Impact Fees Program Technical Document, which are incorporated herein by reference.
2. *Service areas and fees.* Such areas will provide a nexus between those paying the fees and receiving the benefits to ensure that those developments paying impact fees receive substantial benefits.
3. *Establishment of overlay service areas.* Overlay service areas may be established for system improvements identified in the capital facilities plan which are:
    a. Designed to serve geographic areas whose boundaries are not generally contiguous with established service areas; or
    b. Designed to serve more than one established service area; or
    c. Where a system improvement is designed to serve an established service area, or service areas, but is located partly or entirely outside of the city or urban growth area, and provides a substantial benefit to the assigned service area. Properties within this type of overlay service area are not subject to city impact fees to the extent those properties are outside the city.
4. *Factors affecting service areas.* Additional or revised service areas may be designated by the city council upon consideration of the following factors:
    a. The Comprehensive Plan;
    b. Standards for adequate public facilities incorporated in the capital facilities plan;

c. The projections for full development as permitted by land use ordinances and timing of development;

d. The need for and cost of un-programmed capital improvements necessary to support projected development; and

e. Such other factors as the city council may deem relevant.

5. *Service areas and urban growth boundaries.* Service areas adjoining an urban growth boundary shall automatically be adjusted to conform to any change in such boundary.

D. Traffic Impact Fee.

1. *Formula.* The impact fee component for roads shall be calculated using the following formula:

$$TIF = FxTxA$$

a. "TIF" means the traffic impact component of the total development impact fee.

b. "F" means the traffic impact fee rate per vehicle trip in dollar amounts, for each service area. Such rate shall be established in the Traffic Impact Fee Program Technical Document, incorporated herein by this reference, for each service area by estimating the cost of anticipated growth-related roadway projects divided by the projected number of growth-related trips within that service area. Between major program updates, the calculated per trip fee will be adjusted annually to account for inflation using the Engineering News Record Construction Cost Index for Seattle, and as outlined in the Traffic Impact Fee Program Technical Document.

c. "T" means the trips generated by a proposed development and calculated according to the Traffic Impact Fee Program Technical Document. The calculation of “T” described in the Traffic Impact Fee Program Technical Document includes, for some retail commercial land uses, a “business enhancement factor (BEF)” adjustment. Refer to the Traffic Impact Fee Program Technical Document for land uses eligible for the BEF. In the absence of a land use code precisely fitting the development proposal, the director of public works or designee shall select the most similar code and may make appropriate adjustments to the trip equation applicable thereto. In selecting the appropriate land use code and in making adjustments thereto, the Review Authority shall be guided by the most recent edition of the Trip Generation Manual, Institute of Transportation Engineers.

d. "A" means an adjustment for the portion of anticipated additional tax revenues resulting from a development which is prorated to system improvements contained in the capital facilities plan. Such adjustment for traffic impacts is determined to be 15%, so that "A" equals 85%.

E. Park Impact Fee.

1. *Formula.* The impact fee component for parks shall be calculated using the following formula:

$$PIF = F \times U$$

a. "PIF" means the parks impact component of the total development impact fee.

b. "F" means the parks impact fee rate per unit of housing, regardless of residential building type, as applicable, for each service area. Such rate shall be established in the parks impact fee program technical document, incorporated herein by this reference, for each service area by estimating the cost of anticipated growth-related parks projects. Between major program updates, the calculated per unit fee will be adjusted annually pursuant to the methodology set forth in VMC 3.08.100 and as outlined in the parks impact fee program technical document.

c. "U" means the number of units, either single-family or multifamily, whichever is applicable, consistent with a proposed development.

2. At least one copy of the park impact fee technical document adopted by the city council, including the current park impact fee schedule as calculated thereunder, shall be filed in the office of the city clerk for use and examination by the public.

F. School Impact Fee.

1. *Plan adoption.* In order for the city to collect school impact fees on behalf of a school district, said school district's capital facilities plan shall be adopted as a portion of the city of Vancouver's comprehensive plan in accordance with the provisions of this section.

2. *Plan submittal.* In conjunction with mandated comprehensive plan updates, a school district requesting impact fees shall submit to the Planning Commission a capital facilities plan adopted by the school board and consisting of the following elements:

a. A standard of service which identifies the program year, class size by grade span, number of classrooms, types of facilities, and other factors identified by the school district.

b. The district's capacity over the next six (6) years based upon an inventory of the district's facilities either existing or under construction and the district's standard of service.

c. A forecast of future needs for school facilities based upon the district's enrollment projections.

d. At least a six (6) year financing plan component, updated as necessary to maintain at least a six-year forecast period, for financing needed school facilities within projected funding levels.

e. Application of the formula set out in subsection F of this section based upon information contained in the capital facilities plan. Separate fees shall be calculated for dwelling units based upon the Building Types, based upon the student generation rates determined by the district for each type of dwelling unit. If insufficient information is available for a district to calculate a student generation rate, a county-wide average shall be utilized. For purposes of this chapter, manufactured homes or home developments and each individual unit in any Building Type shall be treated as one (1) dwelling.

3. *Planning Commission review.* The Planning Commission shall review a school district's capital facilities plan or plan update in accordance with the provisions of this subsection.

   a. *Factors.* The Planning Commission shall consider:

      i. Whether the district's forecasting system for enrollment projections appears reasonable and reliable;

      ii. Whether the anticipated level of state and voter-approved funding appears reasonable and historically reliable;

      iii. Whether the district appropriately applied the formula set out in subsection F of this section.

   b. *Public hearing.* In the event the district or the Planning Commission on its own motion proposes to modify the school impact fee, the Planning Commission shall not make its recommendation until holding a duly advertised public hearing on the proposal.

   c. *Recommendation.* The Planning Commission may request a school district to review and to resubmit its capital facilities plan or update consistent with the provisions of this section. The Planning Commission shall submit an annual report to the board for each school district for which school impact fees are collected.

4. *Council action.* No new or revised school impact fees shall be effective until adopted by the council following a duly advertised public hearing to consider the school district's capital facilities plan or plan update.

5. *Interlocal agreement.* School impact fees shall not become effective until the school district has entered into an interlocal agreement provided for in VMC 20.450.030(K).

6. *Formula.* The impact fee component for schools shall be separately calculated for each participating school district using the following formula:

$$SIF = \{ (CS \times SF) - (SM) - (TC) - (FC) \} \times A$$

   a. *SIF* means the school component of the total development impact fee.

b. *CS* means the cost of the improvements for each type of facility listed in the school district's capital facilities plan less the cost to cure existing overcapacity divided by the capacity of the improvement. Type of facility means elementary school, middle school and high school.

c. *SF* means student factor. The student factor is the number of students typically generated from one residential unit for each type of school facility.

d. *SM* means state match. State match is the amount received from the state toward school construction costs. The state match component of the formula is that amount representing the per student amount of state matching funds. This is calculated for each type of facility as: student factor times Boeckh Index (average annual construction cost of a school facility per square foot) times square-foot standard per student established by the Superintendent of Public Instruction times state match percentage (that percentage of the total cost of a school facility funded by state funds). The state match for each school district shall be calculated annually.

e. *TC* means tax credit. This is calculated as:

$$TC = (1 + i)^{10} - 1i(1 + i)^{10} \times (AAV) \times (SPTL)$$

i. *AAV* means the average assessed value for the dwelling per single family unit.

ii. *SPTL* means the current school district capital property tax levy rate.

iii. *i* means the current interest rate as stated in the Bond Buyer Twenty Bond General Obligation Bond index.

iv. *FC* means facilities credit. This is the value of any improvements listed in a school district's capital facilities plan provided by the developer.

v. *A* means an adjustment for the portion of anticipated additional tax revenues resulting from a development that is prorated to system improvements contained in the capital facilities plan. The adjustment for school impacts is determined to be eighty-five (85%) percent.

G. Calculation of Impact Fee.

1. For Building Types which contain an individual use type, including Industrial Uses, Office Uses, Active Retail Uses, Residential Uses, or Passive Retail Uses. The impact fee for a Building Type with only Industrial Uses, Office Uses, Active Retail Uses, or Passive Retail Uses shall be computed by applying the traffic impact fee formula set out in VMC 20.450.030.D.1. The impact fee for a Building Type with only residential uses shall be computed by applying the traffic impact fee (20.450.030.D), park impact fee (20.45.030.E) and school impact fee (20.450.030.F) formulas, combining the results; provided, that the school impact fee component shall not apply to housing which by restrictive covenant is exclusively for persons fifty-five (55) years of age or older.

2. For Building Types which contain any combination of Office Uses, Active Retail Uses, Residential Uses, and Passive Retail Uses. If the development for which approval is sought contains a mix of uses, the impact fee must be separately calculated for each type of use.
3. Criteria to reduce or eliminate impact fees. An administrative appeal may be considered by the director of community development to reduce or eliminate impact fees by submittal of an application prior to the payment of fees. Appeals shall be reserved for unusual circumstances which make the standard impact fee as applied to the development unreasonable. Upon receipt of an application for any such appeal, the city shall distribute a written notice of appeal and a copy of the supporting studies and data required below to the office, department, or school district responsible for the applicable capital facilities for which the impact fee is imposed. The appeal must be supported by reasonable studies and data provided by the applicant showing that:
    a. The formula or method contained in VMC 20.450.030.D, 20.450.030.E or 20.450.030.F to calculate the fees do not accurately reflect the cost of system improvements that are reasonably related to the service demands and needs of a particular development; or
    b. Such facility improvements will not reasonably benefit the proposed development.
4. The current development proposal implements a concomitant rezone agreement, development agreement or other development approval pursuant to which public facilities identified in the capital facilities plan were dedicated or constructed, and which are of benefit to the community at large and which fall within the definition of system improvements. The appellant shall have the burden of producing and presenting studies and data that clearly show the basis and substantiation of the appeal upon submittal. Appeals shall be reviewed by means of a Type I procedure, pursuant to VMC 20.210.020. Impact fees may be paid under protest in order to obtain a permit or approval of development activity.

H. Additional provisions for Deferral of Impact fees for Building Types that Only Include One (1) Dwelling Unit.

1. Prior to issuance of permits for any Building Type with one (1) unit, an application may be submitted for deferral of payment of full impact fees until scheduling of final building inspection by the City.
2. The amount of impact fees deferred shall be determined by the fees in effect at the time the applicant applies for a deferral. “Applicant” as defined in this section shall include an entity that controls the applicant, that is controlled by the applicant, or is under common control with the applicant.
3. An impact fee deferral application must be submitted for each parcel to be developed. This application shall include:

a. A locally recorded impact fee deferral lien against the property involved, granted to the City of Vancouver in the amount of the deferral. The deed shall be signed by all owners of the property, with signatures acknowledged as required for a deed. The deed shall be binding on all successors, and subordinate to one mortgage for construction of the property granted by the impact fee deferral applicant.

b. The deferral period shall not exceed a period of eighteen (18) months from issuance of the building permit, at which time any deferred impact fees shall be due.

c. Upon receipt of all deferred impact fees, the City of Vancouver shall execute release of the lien for the property. The property owner at that time shall be responsible for recording the release, at their expense.

d. The City of Vancouver may institute foreclosure proceedings for unpaid impact fees due. For unpaid School Impact Fees, School Districts may also institute foreclosure proceedings if the City of Vancouver has not done so within forty-five (45) days after receiving notice from the District requesting initiation of such proceedings.

I. Impact Fee Exemptions, Reductions, and Waivers.

1. *Exemptions from impact fees.* The following developments shall be exempt from the requirement for payment of impact fees: publicly operated elementary, middle, junior high and senior high schools, and administrative, maintenance and other facilities of a school district and facilities of an Educational Service District.

2. *Exemption or waiver from impact fees for low-income housing pursuant to RCW 82.02.060(2).* Pursuant to RCW 82.02.060(2), the review authority may grant a total or partial exemption or waiver from impact fees for housing developments containing up to three dwelling units and qualifying as low-income housing as defined in this chapter, to be owned and occupied by, or leased to, low-income persons. Requests for exemption and/or waiver for four or more dwelling units must be approved by the city council. No such impact fee exemption and/or waiver shall be granted for any low-income housing that has been granted a property tax exemption pursuant to Chapter 3.22 VMC, Multi-Family Tax Abatement. Any such exemption or waiver shall be subject to:

a. Provision being made for payment of the impact fee from public funds other than impact fee accounts; and

b. Adequate documentation that the housing meets appropriate standards regarding household income, rent levels, sales price, location, and number of units;

3. *Alternative exemption from impact fees for low-income housing pursuant to RCW 82.02.060(3).* Pursuant to RCW 82.02.060(3), the city council may grant an alternative exemption for low-income housing under this subsection. No such impact fee exemption and/or waiver shall be granted for any low income housing that has been granted a property tax exemption pursuant to Chapter 3.22 VMC, Multi-Family Tax Abatement

    a. The city council may either:

        i. Grant a partial exemption of not more than eighty (80%) percent of impact fees, in which case there is no requirement to pay the exempted portion of the fee from public funds other than impact fee accounts; or

        ii. Provide a full waiver, in which case the remaining percentage of the exempted fee must be paid from public funds other than impact fee accounts; and

    b. Compliance with all of the requirements of subsection D of this section is required.

4. An exemption for low-income housing granted under subsection B or C of this section must comply with all of the following conditions:

    a. The developer shall record a covenant with the Clark County auditor. The covenant must:

        i. Prohibit using the property for any purpose other than for low-income housing.

        ii. Require that if the property is converted to a use other than for low-income housing, the property owner must pay the applicable impact fees in effect at the time of conversion.

        iii. Define low-income housing as housing for which the monthly housing expense is no greater than thirty (30%) percent of eighty (80%) percent of the median-family income adjusted for family size for Clark County, Washington, as reported by the United States Department of Housing and Urban Development.

    b. When the city grants an exemption for low-income housing granted under subsection B or C of this section, it may not collect revenue lost through the granting of the exemption by increasing impact fees unrelated to the exemption.

    c. A school district that receives school impact fees collected by the city must consent in writing prior to city approval of any exemption from school impact fees granted under subsection B or C of this section. Failure of a school district to provide consent in writing to the city within thirty (30) days of the school district's receipt of written request for approval from the city shall constitute disapproval of the requested exemption.

5. *Impact Fees for Accessory Dwelling Units.* Impact fees for up to two ADUs (1,000 square feet or less) on a site shall be 50% of the principal unit but are otherwise calculated based on the ADU square footage. If the primary unit is an existing structure, the impact fees for the ADU will be calculated based on the principal unit fee if it were built today.

6. *Criteria for calculating impact fees.* The impact fee for an exempt or waived development shall be calculated as provided for in this chapter and paid with public funds; except that there is no requirement to pay the exempted portion of the fee from public funds other than impact fee account for a partial exemption of not more than eighty (80%) percent of impact fees that has been approved under subsection C of this section. Such payment may be made by including such amount(s) in the public share of system improvements undertaken within the applicable service area. If an impact fee(s) is waived, the review authority, pursuant to VMC 20.450.030(G), or state law may determine whether a public share-contribution or a reduced public-share contribution is required.

J. Impact Fee Credits.

1. For the developer. The developer shall be entitled to a credit against the applicable impact fee as follows:

   a. The developer shall be entitled to a credit against the applicable impact fee for the fair market value of any dedication of land for and reasonable documented construction costs acceptable to the City associated with the improvement to, or new construction of any system improvements provided by the developer that are identified in the capital facilities plan and that are required by the City as a condition of approval to the development proposal against which the impact fee is assessed.

   b. No credit shall be given for project improvements as defined under VMC 20.150.

   c. *Traffic Impact Fee Credit.* Effective June 3, 2015 (effective date of ordinance), the maximum traffic impact credit shall be in the amount of the impact fee applicable to the development proposal against which the impact fee is assessed. The credit shall be applied to the impact fee as calculated for the development proposal against which the impact fee is assessed and shall not exceed the impact fee due.

   d. *Street Project Assessment Reimbursement Contract for Excess Costs.* If a developer has incurred costs for street project system improvements in excess of the amount of the traffic impact fee applicable to the development proposal against which the impact fee is assessed, the developer may apply to the City for a street project assessment reimbursement contract pursuant to VMC Chapter 11.10.

   e. *Existing traffic impact fee credits.* TIF credits that existed prior to June 3, 2015 (effective date of ordinance) shall be utilized consistent with the provisions of the TIF Program Technical Document. The value and ownership of such TIF credits as of June 3, 2015 (effective date of ordinance) shall be documented by a list thereof published by the City and distributed by US mail to the last known addresses of said owners on June 3, 2015 (effective date of ordinance).

2. *Traffic Impact Fee Credit for the developer.* Additionally, the developer may be provided a credit against the impact fee in an amount up to ten (10%) percent of the traffic component to account for contributions of mass transit facilities that are approved by the City and made a condition of approval for the development.

3. *Impact fee reduction.* Where impact fees are owing prior to completion of a system improvement undertaken by the developer, the impact fee shall be reduced by 85% from the Director of Public Works estimate of the credit to be due upon dedication and completion of the required work, provided, if the same has been assured by a bond or other guarantee, as governed by Section 20.450.010 VMC, to be completed no later than the date of occupancy for Building Types with Office Uses, Active Retail Uses, Passive Retail Uses, Industrial Uses, or Residential Uses with more than one (1) dwelling unit or the final building inspection for Building Types with Residential Uses having only one (1) dwelling unit and other uses. Upon completion of the required system improvement, appropriate refunds shall be made and credits recognized up to but not to exceed the amount of the impact fee applicable to the development proposal against which the impact fee is assessed based upon the Director of Public Works' determination of the value of dedication and reasonable construction costs.

4. *City credit utilization.* Traffic impact fee credits issued by the City after June 3, 2015, (effective date of adopted ordinance) may be utilized in lieu of cash payment only for traffic impact fees for the development proposal against which the impact fee is assessed, as provided in subsection (J)(1) above. Other impact fee credits recognized by the City may be utilized in lieu of cash payment of impact fees for the subject development and/or any other development within the same service area.

K. Other provisions.

1. *Process for revision of traffic impact fees.* Traffic impact fee rates shall be adjusted periodically to reflect changes in costs of land acquisition and construction, facility plan projects and anticipated growth. Traffic Impact Fee Program Technical Document may contain provision for automatic revision of traffic impact fee rate no more than once annually to reflect the change in a generally recognized and applicable inflation/deflation index.

2. Park impact fee rates may be revised. Rates may be revised using the following process:

   a. The adopted Park Impact Fee Technical Document may be revised periodically by the city council when financial analysis establishes that there is a need for a major program update, but no less than every three years to evaluate the status of the rate of collection and the projected need to serve future residents. Such adjustments shall only become effective upon adoption by the city council.

b. *Process for revision of school impact fees.* School impact fee rates shall be adjusted periodically to reflect changes in costs of land acquisition and construction, facility plan projects and anticipated growth. Such adjustments shall only become effective upon adoption by the city council of a modification to the capital facilities plan.

3. *Operation of impact fee fund.* The city has created and established a special purpose, nonlapse impact fee fund. The city finance director shall establish separate accounts within such fund and maintain records for each such account whereby impact fees collected can be segregated by type of facility and by service area:

   a. *Collected interest.* All interest shall be retained in the account and expended for the intended purposes that the impact fees were imposed.

   b. *Impact fee fund annual report.* By April of each year, the finance director shall provide a report for the previous calendar year on each impact fee account showing the source and amount of moneys collected, earned or received and system improvements that were financed in whole or in part by impact fees.

4. *Inter-local agreements and fees.* The city of Vancouver may enter into an inter-local agreement with Clark County to establish a coordinated program for the imposition, collection, administration and expenditure of traffic and park impact fees.

5. *School impact fees.* School impact fees shall not be collected on behalf of any school district until such district enters into an inter-local agreement with city of Vancouver providing for submittal of capital facilities plans, fund administration, report of expenditure, allocation of risk, and other appropriate matters. Where Clark County adopts a substantially similar school impact fee for a district whose boundaries include portions of the city of Vancouver, such an inter-local agreement may include the county. The inter-local agreement may include a fee to cover the city's cost of administering the school impact fee program.

6. *Imposition of impact fees for costs previously incurred.* The Review Authority may impose an impact fee for system improvements costs previously incurred by the city of Vancouver to the extent that new growth and development will be served by the previously constructed improvements, provided such fee shall not be imposed to make up for any system improvement deficiencies.

7. *Expenditures for system improvements with impact fees.* Impact fees for system improvements shall be expended only in conformance with the capital facilities plan. Impact fees shall be expended or encumbered for a permissible use within ten (10) years of receipt, unless an extraordinary and compelling reason exists for fees to be held longer than ten (10) years. Such extraordinary or compelling reasons shall be identified in written findings by the city council.

8. *Refunds for the current owner.* The current owner of property on which an impact fee has been paid may receive a refund of such fee if the city fails to expend or encumber the impact fees within ten (10) years of when the fees were paid, or such other period of time established pursuant to this subsection, on public facilities intended to benefit the development activity for which the impact fees were paid. In determining whether impact fees have been encumbered, impact fees shall be considered encumbered on a first-in, first-out basis. The current owner likewise may receive a proportionate refund where the public funding of applicable service area projects by the end of such ten (10) year period has been insufficient to satisfy the ratio of public-to-private funding for such service area as established in the capital facilities plan. The city shall notify potential claimants by first-class mail deposited with the United States Postal Service at the last known address of claimants.

    a. *Refund time period.* The request for refund money must be submitted to the Vancouver city council in writing within one year of the date the right to claim the refund arises or the date the notice is given, whichever is later. Any impact fees that are not expended within these time limitations, and for which no application for refund has been made within this one-year period, shall be retained and expended on the indicated capital facilities. Refunds of impact fees under this subsection shall include interest earned on the impact fees.

9. *Criteria for a refund with interest.* A developer may request and shall receive a refund, including interest earned on the impact fees, when the building permit for which the impact fee has been paid has lapsed for noncommencement of construction. A partial refund shall be provided where the project for which a building permit has been issued has been altered resulting in a decrease in the amount of the impact fee due.

10. *Impact fees as additional and supplemental requirements.* The impact fee is additional and supplemental to, and not in substitution of, any other requirements imposed by the city on the development of land or the issuance of building permits. This is provided that any other such city development regulation which would require the developer to undertake dedication or construction of a facility contained within the city capital facility plan shall be imposed only if the developer is given a credit against impact fees as provided for in subsection 20.450.030(J) VMC.

20.450.035 Landscaping and Tree Conservation

A. *Purpose.* The intent of this chapter is to ensure that all Building Types with new or substantially remodeled buildings, accessory uses, and parking lots, garages and structures are provided with landscaping and trees to ameliorate air and noise pollution; to afford protection from wind and inclement weather protection; to enhance ecological and economic value; and to regulate open storage to make the City a more aesthetically pleasing place to live, work and play as well as to establish a process and standards to provide for the protection, preservation, replacement, proper maintenance and use of trees, associated vegetation and soils located in the City of Vancouver.

1. The City recognizes the aesthetic, ecological and economic values of trees and landscaping to:
    a. Establish and protect vegetation and tree canopy coverage in urban areas for aesthetic, health (e.g. improved air quality, reduction in atmospheric carbon dioxide, etc.) and urban wildlife reasons;
    b. Reduce stormwater runoff pollution, temperature, and rate and volume of flow;
    c. Promote compatibility between land uses by reducing the visual, noise and lighting impacts of specific development on users of the site and abutting uses;
    d. Aid in energy conservation by providing shade from the sun and shelter from the wind; and
    e. Restore natural communities through reestablishment of native plants.
    f. Promote site planning, building, and development practices to prevent indiscriminate removal or destruction of trees and vegetation and avoid unnecessary disturbance to the City's natural vegetation;
    g. Comply with the requirements of the Forest Practice Rules pertaining to land use conversion activities;
    h. Implement the goals and objectives of Low Impact Development from the Washington State Department of Ecology as required in the Western Washington Phase II Municipal Stormwater Permit.
    i. Cost-effective protection against severe weather conditions with cooling effects in the summer months and insulating effects in winter;
    j. Provide habitat, cover, food supply and corridors for a diversity of fish and wildlife; and
    k. Contribute to the region's natural beauty and enhance the aesthetic character of the community.

B. Applicability. The provisions of this chapter shall apply to all site development including the construction of new structures, parking, access, etc., removal of existing trees, and areas of site disturbance, unless expressly exempted herein.
    1. *Permit required.* No person or representative, directly or indirectly, shall remove, or destroy any tree, within the city, without first obtaining a tree removal permit as provided in this Chapter, unless the activity is exempted.
    2. *Tree, Vegetation, and Soil Plan required*. A tree, vegetation and soil plan which meets the minimum tree retention, tree density and tree canopy coverage standards of subsection 20.450.035(C) and in accordance with 20.450.035(D) shall be submitted to the Planning Official for review and approval.

3. *Landscape plan required*. A landscape plan which meets the minimum percentages, buffering of Section 20.450.035(C), and prepared in accordance with subsection 20.450.035(D) shall be submitted to the Planning Official for review and approval.

4. *Review procedures.* Landscape and tree plans shall be reviewed in conjunction with the associated application. In the event that the landscape or tree removal plan is proposed as a separate action, the Planning Official shall approve, approve with conditions, or deny a plan submitted under the provisions of this chapter by means of a Type I procedure, per Chapter 20.210 VMC, Decision-Making Procedures.

5. *Extent of liability.* Nothing in this Chapter shall be deemed to impose any liability upon the city or upon any of its officers or employees, or to relieve the owner or occupant of any private property from the duty to keep in safe and healthy condition the trees upon their property or upon a public right-of-way over their property.

C. General Requirements

1. *Alternative compliance.* All tree removal permit activities regulated by this chapter shall be performed in compliance with the applicable standards contained in this chapter, unless the applicant demonstrates that alternate measures or procedures will be equal or superior to the provisions of this chapter in accomplishing the purposes of this chapter. Such alternative measures and procedures shall require approval by the Planning Official.

2. *Application, fee and mitigation costs.* An application for a tree removal permit and/or tree, vegetation, and soil plan review shall be made on a form provided by the city, and shall be submitted at the same time as the tree, vegetation, and soil plan. The applicant shall pay a permit fee to the community development department. Prior to tree removal, mitigation costs are required to be paid to the City Tree Account based on tree units of non-exempt existing trees permitted to be removed. Mitigation costs are not required for hazardous, nuisance, dead/declining, invasive or damaged trees, trees in poor or very poor condition and trees on the City of Vancouver Invasive Tree List. Enhanced mitigation costs of one and a half (1.5) times the regular mitigation costs are required to be paid to the City Tree Account based on the largest tree units of existing non-exempt trees permitted to be removed below the thirty-three (33%) percent preservation threshold.

3. Exemptions to Standards.

   a. Exemptions for Tree Removal. The following tree removal activities are exempt from the tree, vegetation, and soil plan and tree removal permit requirements, unless located within a critical area or buffer.

      i. *Commercial nurseries or tree farms.* Removal of trees that are being grown to be sold as Christmas or landscape trees.

ii. *Emergencies.* Removal of trees necessary to protect public safety or private or public property from imminent danger, unless otherwise determined by the Planning Official.

iii. *Harvesting with a Class II or III forest practices permit.* Removal of trees as allowed with a Class II or III forest practices permit issued by the Washington State Department of Natural Resources.

iv. *Parcels occupied with single dwelling unit.* Removal of trees less than twelve (12") inches DBH unless the tree is a code requirement or has the presence of a critical area.

v. *Undeveloped property.* Removal of up to a total of six (6) trees from an undeveloped parcel within any consecutive thirty-six (36) month period, if the parcel is intended to remain undeveloped for a period of six (6) years. Such intent shall be recorded in a covenant. A copy of the covenant shall be provided to the Planning Official. Removal of trees on parcels of less than one acre in size shall be limited in proportion to six (6) trees per acre (i.e., on a half (1/2) acre parcel can remove three (3) trees).

vi. *Minor development.* A tree, vegetation, and soil plan is not required for any site disturbance less than five hundred (500 SF) square feet and where no tree will be removed or adjacent tree(s) impacted.

b. Exemptions from Minimum Tree Density, Tree Canopy Coverage and Cool Site Surfaces Requirements. For the purpose of calculating required minimum tree density, tree canopy coverage and meeting cool site surfaces requirements, the following areas and activities are exempt:

i. Maintenance and repair activities (e.g. parking lot repaving);

ii. Public rights-of-way, areas to be dedicated as public right-of-way, private streets constructed to city standards, alleys, and railroad corridors;

iii. Areas where trees are not appropriate as determined by the Planning Official (e.g., athletic fields, designated contamination areas, utility corridors and water quality facilities);

iv. Docks and related overwater facilities;

v. Existing Port of Vancouver marine terminals as of the date of this ordinance;

vi. Properties zoned RAC Regional Activity Center in the Heights Subarea and Downtown Design Guidelines District; and

vii. Development activities carried out consistent with the provisions of a programmatic permit that has been issued the City or on sites for which tree density mitigation has previously been provided and documented.

c. Exemptions from Tree Preservation Requirement in 20.450.006. 030.C. For the purposes of the minimum preservation standard, exempt trees include:

i. Trees in poor, very poor, or dead condition;

ii. Trees meeting the nuisance tree criteria;

iii. Trees meeting the hazard tree criteria;

iv. Trees on the City of Vancouver Invasive Tree List;

v. Offsite trees that are preserved;

vi. Street trees in the public right of way; and

vii. Trees that are less than 12 inches DBH.

d. Exemption from Water Conservation Standards.

i. The water conservation standards shall not apply to landscaping in private areas of Building Types with one (1) to six (6) dwelling units. Parks, playgrounds, sports fields, golf courses, schools, and cemeteries are exempt from specified turf area limitations where a functional need for turf is established. All other requirements are applicable.

4. *Preservation of Existing Trees and Vegetation.* For all development projects, existing vegetation and non-exempt trees shall be preserved and protected according to the following standards:

a. Projects shall be designed to preserve and protect a minimum of thirty-three (33%) percent of non-exempt existing trees at least twelve (12”) inch DBH and in fair and good condition and incorporate them into the tree and landscape plan where preservation of thirty-three (33%) percent of non-exempt existing trees in fair and good condition will not prevent reaching the minimum density range for the underlying zone.

b. When there are location alternatives on site for proposed building structures or other site improvements, existing vegetation and trees are to be preserved, even if the minimum tree density and minimum tree canopy percentage is exceeded. This may require site redesign including but not limited to: redesign of streets, sidewalks, stormwater facilities, utilities; changing the shape and size of the parking lot; reducing or limiting proposed site grading; construction of buildings on pier foundations, and changing the location or reducing the number of buildings or building lots as long as the project is within the allowed density range.

c. The developer shall provide methods for the protection of existing vegetation to be retained, such as protective fencing to remain during the construction process.

d. Plants to be saved and areas not to be disturbed shall be noted on the landscape plan. The plan shall locate fencing used to protect vegetation and soils from damage during construction

e. If existing trees and vegetation meet the requirements for the required landscaping, they shall have priority over and may substitute for the required landscaping pursuant to the guidelines established in subsection 20.450.035(G).

f. In designing a development project and in meeting the required minimum tree density and tree canopy coverage percentage, the applicant shall prepare the required tree, vegetation, and soil plan in the following order of tree preservation priority. Trees and native vegetation to be preserved must be healthy, wind-firm, and appropriate to the site at their mature size, as identified by a qualified professional.

   i. Heritage trees.

   ii. Trees located within or adjacent to sensitive areas.

   iii. Floodplains and wellhead protection areas.

   iv. Other individual trees or groves of trees.

g. On sites where there are currently inadequate numbers of existing trees, or where the trees are inappropriate for preservation, as determined by the Planning Official, then replacement tree planting shall be required. In designing a development project and in meeting the required minimum tree density and tree canopy coverage percentages the following trees shall be planted in the following order of priority:

   i. Trees planted within or adjacent to designated sensitive areas.

   ii. Trees planted adjacent to stormwater retention/detention ponds.

   iii. Trees planted within or adjacent to floodplains and wellhead protection areas.

   iv. Entrance landscaping, traffic islands, separate deeded tree tracts, and other common areas in residential subdivisions.

   v. Trees planted on individual lots with building types with residential primary uses.

   vi. Trees planted throughout the development in groupings to create canopy corridors and to reflect the regional landscape.

5. Minimum Landscape Requirements.

   a. *Landscaping percentage and screening*. Landscaping shall be provided and maintained per Section 20.410.150 Lot Buffers and Table 20.450.035-1.

TABLE 20.450.035-1. LANDSCAPING AND SCREENING DESIGN STANDARDS[1]

Type	Name	Description	Minimum Shrubs Based on Buffer Depth	Minimum Trees	Wall or Berm or Fence Required – Standards
L1	General (for open areas)	Used where distance is primary means of separating uses or development, and landscaping enhances area between them	a. Ten (10') feet or less = None b. Over ten (10') feet = two (2) high or three (3) low shrubs per four hundred (400 SF) square feet landscaped area	a. One (1) tree per thirty (30') lineal ft. b. One (1) tree per eight hundred (800 SF) square feet	None
L2	Low Screen	Distance and low-level screening intended to separate uses or development. Applied where low-level screening sufficiently reduces the impact of a use or development, or where visibility between areas is more important than a greater visual screen.	Continuous screen three (3') feet high, ninety-five (95%) percent opaque year-round. Three or more) (3+) gallon containers or equivalent with spread eighteen or more (18"+) inches	One (1) tree per thirty (30') lineal feet of landscaped area or as needed to provide a tree canopy over the landscaped area	Three (3') foot high masonry wall or F2 fence or a berm may substitute for shrubs

Type	Name	Description	Minimum Shrubs Based on Buffer Depth	Minimum Trees	Wall or Berm or Fence Required – Standards
L3	High Screen	Physical and visual separation between uses or development principally using screening. Used where full separation is warranted by impacts of proposed development, notwithstanding loss of direct views.	Enough shrubs to form a six (6') foot high buffer screen ninety-five (95%) percent opaque year-round; five or more (5+) gallon containers or equivalent with spread of thirty or more (30"+) inches		Six (6') foot F1 or F2 high wall or fence with or without berm may substitute for shrubs
L4	High Wall	Used where extensive screening of visual and noise impacts is needed to protect abutting sensitive uses and/or there is little space for separation between uses.	Four (4) high shrubs required per thirty (30') lineal feet of wall		Six (6') foot F2 high wall required

Type	Name	Description	Minimum Shrubs Based on Buffer Depth	Minimum Trees	Wall or Berm or Fence Required – Standards
L5	High Berm	Used instead of L4 where extensive screening is warranted and more space is available for separation between uses.	L2 low shrubs on top of berm so total screen height = six (6') feet.		Four (4') feet to six (6') feet high berm required. If under six (6') feet high, plant L2 low shrubs on top of berm so overall screen height is six (6') feet.
F1	Partially Sight-Obscuring Fence	Partial visual separation applied where a proposed use or development has little impact, or where visibility between areas is more important than a total visual screen.			Six (6') feet high – at least fifty (50%) percent sight-obscuring – wood, metal, chain link with slats, bricks, masonry or other permanent materials.
F2	Fully Sight-Obscuring Fence	Full visual separation where complete screening is needed to protect abutting uses, and landscaping alone cannot provide that separation.			Six (6') feet high – one hundred (100%) percent sight-obscuring – made of wood, metal, bricks, masonry or other permanent materials – no chain link fences with slats or similar construction.

[1] Additional Requirements:

L1, L2, L3, L4, L5 – Groundcover plants, grass lawn or approved flowers must fully cover the landscaped area not in shrubs or trees.

L2, L3 – When applied along front build-to-lines (primary streets) or side build-to-lines (side streets), the screen or wall is to be placed along the interior side of the landscaped area.

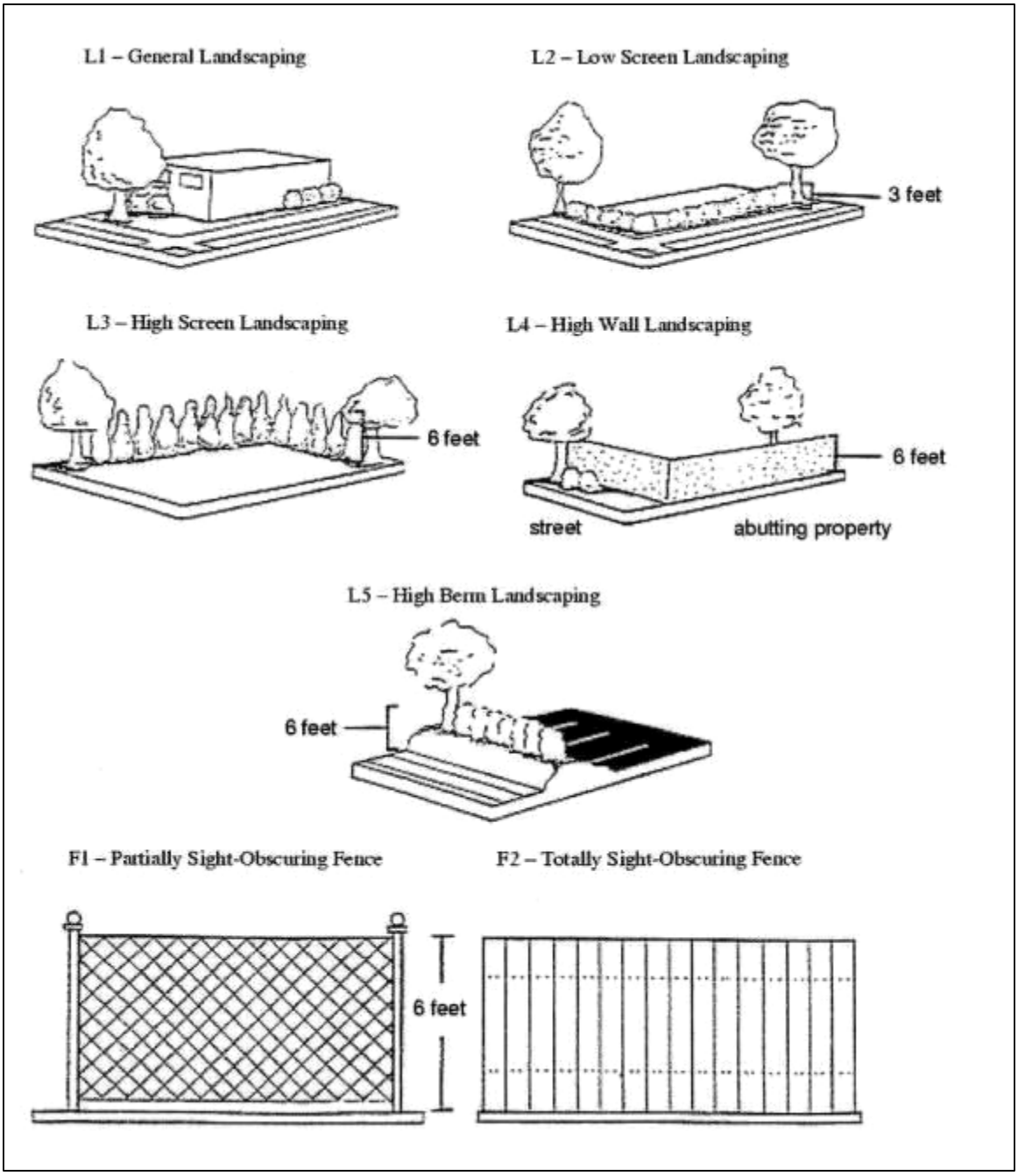
L4 – When abutting another property along side setback lines (adjacent lot) or rear setback lines (adjacent lot), the wall shall abut the property line. When abutting front build-to-lines (primary streets) or side build-to-lines (side streets), the wall shall be on the interior side of the landscaped area.

L1 – Within any Building Type with Office Uses, Active Retail Uses, or Passive Retail Uses where the Building Type is to be placed at the buffer line for a front setback, concrete or brick pavers may be used in place of the required groundcover for the length of the building for the front build-to-line only, provided the required trees are still supplied, the paved area is connected to the public sidewalk, and pedestrian amenities are provided such as benches or pedestrian plazas. Building need not be placed at the required buffer line to utilize this section if the area between the buffer line and the Building Type is devoted entirely to pedestrian-only areas.

L1, L2, L3, L4, L5 – Groundcover plants to be placed not more than thirty (30) inches on center and thirty (30) inches between rows. Rows of plants shall be staggered for a more effective covering. Groundcover shall be supplied in a minimum four (4) inch size container or a two-and-one-quarter-inch (2-1/4”) container or equivalent if planted eighteen (18”) inches on center.

L1-L5, F1, F2 - Buffer Trees. Required number of trees to be planted within the buffer shall be planted along each property line to provide buffering along all adjacent properties. When space is unavailable for planting the required buffer trees as determined by the Planning Official due to site constraints-not design constraints, then the applicant shall pay the estimate costs of the current market value of the trees, including installation and maintenance costs into the City’s Tree Account.

FIGURE 20.450.035-1 LANDSCAPING AND SCREENING DESIGN TYPES ILLUSTRATED



b. Parking Lot Landscaping and Screening. Interior landscaping shall be provided for sites containing more than ten (10) parking spaces.

   i. *Standards.* The landscape materials shall meet the below standards:

(A). At least ten (10%) percent of the parking and maneuvering areas, not including driveway areas shall be landscaped

(B). The landscaping shall be dispersed throughout the parking area. All of the required landscape area may be in the parking area, or some may be in the loading areas.

(C). Perimeter landscaping may not substitute for interior landscaping. However, interior landscaping may join perimeter landscaping as long as it extends at least four (4') feet into the parking areas from the perimeter landscape line.

ii. *Individual tree-planting spaces.* Where an individual tree is planted in a space surrounded by pavement, the planting area shall have a minimum of four hundred and fifty-nine (459 CF) cubic feet of open soil per tree (for example: nine (9') feet by seventeen (17') feet by three (3') feet in depth and minimum width of six (6') feet or greater). If other elements such as, but not limited to fire hydrants, streetlights, and utility vaults are to be included in landscape islands, landscape island shall be enlarged to provide at least four hundred and fifty-nine (459 CF) cubic feet of open soil per tree and appropriate distance between additional elements and the required tree.

iii. *Required landscape materials for parking lot landscaping.* Landscape materials for parking lot interior and perimeter landscaping shall be provided as follows:

(A). *Trees required.* At least one tree shall be provided for every five (5) parking stalls in addition to any additional trees required to achieve fifty (50%) percent tree canopy coverage of the parking lot, where coverage is based upon the mature size of the tree. Trees shall be evenly distributed throughout the parking area. Existing trees may be used to meet this standard. Broadleaf trees shall be at least two (2) caliper inches at the time of planting and conifer trees shall be at least six (6') feet tall at the time of planting. Trees shall be dispersed throughout the parking area to provide shade for the parking area. Some trees may be grouped, but the groups shall be dispersed.

(B). *Shrubs required.* At least one shrub shall be provided for every thirty (30 SF) square feet of required landscaped area. Shrubs shall be at least one (1) gallon container size.

(C). *Ground cover required.* All of the landscaped areas that are not planted with trees and shrubs shall be planted in ground cover plants, which may include grasses. Paths made of paving stones, flagstones, bricks, pavement, or similar materials may provide access across landscaped areas, but the surface area of impermeable materials does not count toward the required landscaped area.

(D). *Native Species.* Priority shall be given to plantings with sustainable features like long-lived, large form, drought-tolerant, climate-resilient, low irrigation, and/or native to the Pacific Northwest.

iv. *Screening of Parking, Loading and Maneuvering Areas.* All parking, loading and maneuvering areas including driveways and drive-through lanes shall be screened from view per the below standards.

(A). Perimeter Landscaping. Any off-street parking area, other than for projects with one (1) to six (6) dwelling units, shall be effectively screened by a sight obscuring fence, wall or evergreen planting on each side which adjoins property situated in a residential zone, the premises of any school or like institution, or a public or private street.

(B). Screening along a common property line shall be six (6') feet high. Landscape screening shall be capable of attaining a height of six (6') feet within two (2) years of planting. Screening along all public or private streets shall be a minimum of three (3') feet high.

6. Minimum Tree Density Requirements.

a. Minimum tree density requirement established. The required minimum tree density is thirty (30) tree units per acre for new development and two hundred (200) tree units for conversion option harvest forest practices.

i. Tree density may consist of existing non-exempt trees, replacement trees or a combination of existing non-exempt trees and replacement trees, pursuant to the priority established in subsection 20.450.035(C)(3). Existing tree units in excess of the minimum density may be required to be retained based on the tree, vegetation, and soil plan review standards of subsection 20.450.035(D). Required street trees may be counted toward the minimum tree density requirement.

ii. When trees are retained in tree tract(s) in a subdivision with Residential Uses, a higher minimum tree density may be set based on the nature of the grove(s); provided, that the creation and establishment of tree tract(s) shall not reduce the housing density allowed on the subject site under applicable requirements of this Title.

iii. Tree density calculation for individual trees.

(A). Diameter Breast Height (DBH) shall be measured in inches at four and one-half (4.5') feet above the ground line or as otherwise specified using the most recent edition of the Guide for Plant Appraisal for trees that do not have a single or uniform trunk at four and one-half (4.5') feet above ground.

(B). The tree unit value that corresponds with DBH shall be found in Table 20.450.006.030-3.

iv. Tree density calculations for heavily forested sites.

(A). The average basal area per acre of the dominant and co-dominant stems shall be based upon the inventory of the existing forested stand using forest mensuration techniques.

(B). Tree units per acre shall be obtained by multiplying the Average Basal Area by two (2) to obtain the Average Basal Area.

v. Trees required to meet minimum tree density shall be planted according to the following priority:

(A). On-site and adjacent rights-of-way or access easements;

(B). *Off-site.* When room is unavailable for planting the required trees on-site, then they may be planted at another approved location in the city;

(C). *City Tree Account.* When on-site and off-site locations are unavailable to meet minimum tree density due to site constraints - not design constraints, then the applicants may mitigate by paying the estimated cost of the current market value of the trees, including installation and maintenance costs, into the City's Tree Account established for purchase, installation, and maintenance of such trees at a rate set by the Urban Forester.

TABLE 20.450.035-2 TREE DENSITY FOR EXISTING TREES

DBH	Tree Units	DBH	Tree Units	DBH	Tree Units
One (1") to six (6") inches	One (1).	Twenty-four (24") inches.	Seven (7).	Thirty-eight (38") inches.	Fourteen (14).
Six (6") to twelve (12") inches.	One and one-half (1.5).	Twenty-six (26") inches.	Eight (8).	Forty (40") inches.	Fifteen (15).
Fourteen (14") inches.	Two (2).	Twenty-eight (28") inches.	Nine (9).	Forty-two (42") inches.	Sixteen (16).
Sixteen (16") inches.	Three (3).	Thirty (30") inches.	Ten (10).	Forty-four (44") inches.	Seventeen (17).

DBH	Tree Units	DBH	Tree Units	DBH	Tree Units
Eighteen (18") inches.	Four (4).	Thirty-two (32") inches.	Eleven (11).	Forty-six (46") inches.	Eighteen (18).
Twenty (20") inches.	Five (5).	Thirty-four (34") inches.	Twelve (12).	Forty-eight (48") inches.	Nineteen (19).
Twenty-two (22") inches.	Six (6).	Thirty-six (36") inches.	Thirteen (13).	Fifty (50") inches.	Twenty (20).

vi. *Minimum Size and Tree Density Value for Replacement Trees.* The required minimum size of the replacement shall be pursuant to Table 20.450.035-3. Each planted tree shall be equivalent to one (1) tree unit. Larger trees are not eligible to receive credit for more than one tree unit.

TABLE 20.450.035-3 PLANTING STOCK SIZE REQUIREMENTS

Development Type	Planting Location	Tree Type	Required Min. Size	Tree Unit Value
Subdivision with Building Types with Residential Uses.	Tree Tracts.	Broadleaf.	One (1") inch Caliper.	One (1).
		Conifer.	Three (3') feet tall.	One (1).
Building Types with Active Retail Uses, Industrial Uses, Passive Retail Uses or Residential Uses with seven (7) or more dwelling units.	All developed locations.	Broadleaf.	Two (2") inch caliper.	One (1).
		Conifer.	Six (6') feet tall.	One (1).
	Undeveloped locations (i.e. woodland interplanting, etc.)	Broadleaf.	One (1") inch caliper	One (1).
		Conifer.	Three (3') feet tall.	One (1).

Development Type	Planting Location	Tree Type	Required Min. Size	Tree Unit Value
Building Types with Residential Uses with six (6) or fewer dwelling units.	All locations.	Conifer.	Fourt (4') feet tall.	One (1).
		Broadleaf.	One and one-quarter (1.25") inch caliper, branched.	One (1).
Undeveloped Property (Conversion Option Harvest).	All locations.	Conifer/Broadleaf.	2-0 Bareroot Seedlings.	One (1).
Required Street Trees.	Public right-of-way or private easement.	Broadleaf.	Two (2") inch caliper.	One (1).

vii. *Replacement tree quality.* Replacement trees shall meet the quality and size standards of this chapter. Replacement trees shall be American Standard for Nursery Stock Grade No. 1 or better.

viii. *Replacement tree planting standards.* Trees shall be planted pursuant to the planting standards delineated herein. For all properties other than those electing conversion option harvest:

(A). The species selection and spacing of trees to be planted shall be such that it provides for the eventual mature size of the trees. Soil type, soil conditions and other site constraints shall be considered when selecting species for planting.

(B). Replacement trees shall optimize tree diversity; include native species and at least sixty (60%) percent large stature native or climate adaptive conifers; utilize insect and disease resistant trees; and shade trees unless determined by the Planning Official as not appropriate for the site conditions. The planting of large stature trees is required to meet the purpose and goals of this Chapter for ecosystem services. The planting of ornamental and columnar trees shall be minimized. The City will maintain a list of large stature, native, climate adaptive, and shade trees for meeting tree planting requirements. Other trees may be approved for planting subject to review and approval by the City.

(C). Trees shall be watered as necessary to ensure establishment, survival and growth, during the first two (2) growing seasons after planting. Trees shall be mulched with composted mulch four (4") inches deep, three (3") inches away from the trunk of the tree and six (6') feet in diameter or to the hardscape edge such as curb or sidewalk. Staking and fertilizer shall be required where deemed necessary by the Planning Official.

7. Minimum Tree Canopy Coverage Requirements.

a. Minimum tree canopy coverage shall be required for new development per Table 20.450.035-4. Projects which exceed Minimum Canopy Coverage % by at least three (3%) percent are eligible for a twenty-five (25%) percent reduction in tree removal mitigation costs.

TABLE 20.450.035-4 MINIMUM TREE CANOPY COVERAGE

Use Types	Minimum Canopy Coverage %
Building Types with Active Retail Uses, Office Uses, Passive Retail Uses;	Fifteen (15%) percent.
Building Types with Industrial Uses.	Nine (9%) percent.
Building Types with Residential Uses and one (1) or more primary uses – Mixed-Use	Twenty-four (24%) percent.
Building Types with Residential Uses with six (6) or fewer dwelling units.	Thirty-three (33%) percent.
Building Types with Residential Uses with seven (7) or more dwelling units.	Twenty-seven (27%) percent.

b. Minimum tree canopy percentage may consist of existing non-exempt trees, replacement trees or a combination of existing non-exempt trees and replacement trees, pursuant to the priority established in subsection 20.450.035(G). Existing trees in excess of the minimum tree canopy percentage may be required to be retained based on the tree, vegetation, and soil plan review standards of 20.450.035.D.

c. Minimum tree canopy coverage calculation. For the purpose of calculating required minimum tree canopy coverage, the following standards apply:

i. The entire development site area shall be included in the calculations;

ii. For development sites that are over one (1) acre in size, the applicant may choose to apply the minimum tree canopy coverage to the area of site disturbance;

iii. Tree canopy cover for onsite trees shall be the existing tree canopy area of retained and protected trees measured according to Figure 20.450.035-2, plus the anticipated tree canopy area after twenty (20) years of each planted tree at the spacing provided;

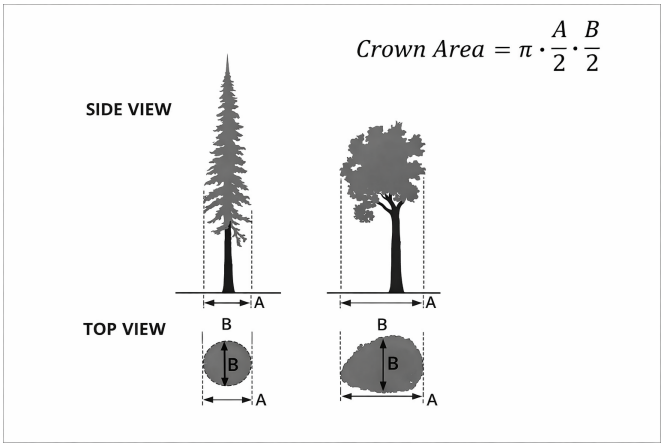
iv. Credit for street tree canopy is only for the portion directly over the development site for existing trees or for planted trees, the tree canopy portion that is anticipated to cover the parcel in twenty (20) years;

v. Overlap of tree canopy between two (2) or more trees shall not receive additional credit;

vi. The City will maintain a list of mature tree canopy coverage areas for trees approved for meeting tree planting requirements. Other trees and their associated canopy areas may be approved subject to review and approval by the City.

d.

FIGURE 20.450.035-2. MEASURING CANOPY AREA OF EXISTING TREES



e. When projects cannot achieve the minimum tree canopy coverage percentage, then the applicant shall pay a tree canopy fee based on the square footage of tree canopy below the minimum requirements into the City's Tree Account. The tree canopy fee shall be required according to the 20.190 Fees VMC

8. *Cool Site Surfaces.* Unless exempted, at least fifty (50%) percent of the development site area outside of building footprints shall consist of cool surfaces. Cool surfaces shall be highly reflective, highly permeable, vegetated, shaded, or a mix of these features as follows:

a. Highly reflective surface: Paving materials with an initial solar reflectance of at least 0.33 or Solar Reflectance Index (SRI) of at least twenty-nine (29).

b. Highly permeable surface: Such surface shall consist of open-graded (uniform-sized) aggregate, permeable pavement, permeable pavers, or porous pavers (open-grid pavers). Permeable pavement and permeable pavers shall have a percolation rate of not less than 2 gal./min per square foot.

c. Vegetated surfaces: Includes vegetated landscape areas or use of plants that provide foliage or tree canopy cover over impervious surfaces on the site within twenty (20) years after planting. Plants must be in place prior to final building inspection or issuance of certificate of occupancy and cannot include artificial turf or other non-living plant material. The square footage of plant foliage or tree canopy over impervious surfaces is eligible for credit towards this standard. Examples for meeting this standard include vegetated landscape beds, parking lot tree canopy cover, and vegetated roofs over breezeways.

d. Shaded surfaces: Provide shade with architectural devices or structures. Area of shading shall be the same as the area of the roof surface (e.g. from a light source projected straight down). If the device or structure is a roof with a slope of less than 2:12, it shall have a three-year aged solar reflectance value of at least 0.55. If the device or structure is not a roof such as a pergola, also with a slope less than 2:12, or if aged solar reflectance information is not available, it shall have (at installation) an initial solar reflectance of at least 0.55. Structures may be covered by energy generation systems such as solar thermal collectors, photovoltaics, and wind turbines without having to meet the above reflectance values.

e. Fee in lieu of Cool Surfaces: For non-exempt sites that are unable to meet this standard, a fee based on the square footage of the site that is deficient of cool surfaces shall be required according to 20.190 Fees, VMC.

9. Street Trees

a. *Street trees required.* All development projects fronting on a primary street, side street, or a private street shall plant street trees in accordance with the below standards. Street trees may be counted toward meeting the minimum on-site tree density requirement.

b. *Street tree planting list.* Approval of any planting list shall be subject to review by the Planning Official, since certain tree species can damage utilities, streets and sidewalks.

c. *Size, and spacing and placement of street trees.* The specific spacing of street trees by size of tree shall be as follows:

i. One two (2") inch caliper tree shall be provided for every thirty (30') feet of frontage on a public or private street, provided that the Planning Official may adjust the spacing to accommodate access points or other obstructions. When space is unavailable for planting the required street trees of one for every thirty (30') feet as determined by the Planning Official, due to site constraints-not design constraints, then the applicant(s) shall pay the estimated cost of the current market value of the street trees, including installation and maintenance costs, into the City's Tree Account established for purchase, installation, and maintenance of such trees;

ii. The species selection and spacing of trees to be planted shall be such that it provides for the eventual mature size of the trees. Soil type, soil conditions and other site constraints shall be considered when selection species for planting;

iii. No new utility pole location shall be established closer than five (5') feet to any existing street tree;

iv. Tree pits shall be located so as not to include utilities (e.g., water and gas meters) in the tree well;

v. On-premises utilities (e.g., water and gas meters) shall not be installed within existing tree well areas;

vi. Street trees shall not be planted closer than twenty (20') feet to light standards;

vii. New light standards shall not be positioned closer than twenty (20') feet to existing street trees except when public safety dictates, then they may be positioned no closer than ten (10) feet;

viii. Where there are overhead power lines, the street tree species selected shall be of a type which, at full maturity, will not interfere with the lines.

ix. Trees shall not be planted closer than two (2') feet from the back of the curb; and

x. Trees shall not be planted closer than two (2') feet from any permanent hard surface paving or walkway:

(A). Space between the tree and the hard surface may be covered by a nonpermanent hard surface such as bricks on sand, paved blocks and cobblestones; and

(B). Sidewalk cuts in concrete for tree planting shall be at least four (4') feet x six (6') feet or six (6') feet x nine (9') feet, or larger depending on the space constraints and the mature size of the tree, to allow for air and water into the root area.

d. *Cut and fill around existing trees.* Existing non-exempt trees may be used as street trees if no cutting or filling takes place within the critical root zone of the tree unless an adjustment is approved by the Planning Official by means of a Type I procedure, per Chapter 20.210 VMC, Decision-Making Procedures.

e. *Replacement of street trees.* Existing street trees removed by development projects or other construction shall be replaced by the developer with those types of trees approved by the Planning Official. The replacement trees shall be of a size and species similar to the trees that are being removed unless lesser-sized alternatives are approved by the Planning Official.

10. Re-vegetation.

a. *When revegetation is required.* Where natural vegetation has been removed through grading in areas not affected by the landscaping requirements and that are not to be occupied by structures, such areas are to be replanted as set forth in this Section to prevent erosion after construction activities are completed.

b. *Preparation for re-vegetation.* Topsoil removed from the surface in preparation for grading and construction is to be stored on or near the sites and protected from erosion while grading operations are underway.

i. Such storage may not be located where it would cause suffocation of root systems of trees intended to be preserved; and

ii. After completion of such grading, the topsoil is to be restored to exposed cut and fill embankments or building pads and amended with compost to provide a suitable base for seeding and planting.

c. Methods of revegetation.

i. Acceptable methods of re-vegetation include replanting with native trees, shrubs, and groundcover and hydro-mulching or the planting of rye grass, barley, or other seed with equivalent germination rates;

(A). The use of native trees, shrubs and groundcovers plant materials is encouraged to reduce irrigation and maintenance demands;

(B). The use of lawn and turf should be minimal. Where lawn or turf grass is to be established, lawn grass seed or other appropriate landscape cover is to be sown at not less than four (4 lbs) pounds to each one thousand (1,000 SF) square feet of land area;

(C). Other revegetation methods offering equivalent protection may be approved by the Planning Official;

(D). Plant materials are to be watered at intervals sufficient to ensure survival and growth; and

(E). Employ other erosion control techniques as required in Chapter 14.24 VMC Erosion Control.

11. *Open Storage and Screening of Service Facilities.* Buffering and screening of service facilities, solid waste receptacles, and open storage shall be required as follows:

a. *Screening of service facilities.* Except for Single-Family, Townhouse/Rowhouse, Stacked Multi-plex, Flex-Plex, and Cottage Court Building Types (Chapter 20.420 VMC), with six (6) dwelling units or less, Any ground-level service facilities such as gas meters, electrical boxes, and air conditioners which would be visible from a public street, parking area, or any other property located in the Low-Scale or Medium-Scale zoning districts, shall be screened from view by placement of a solid wood fence, chain link fence with slats, evergreen hedge or masonry wall.

b. *Open Storage.* Open storage, or storage not wholly within an enclosed building, shall meet the following requirements of Table 20.450.035-6:

TABLE 20.450.035-6. OPEN STORAGE STANDARDS

Zoning District	Open Storage Requirement
Low Scale Neighborhood (LS) and Manufactured Home Park (MH).	Not allowed.
Medium Scale Neighborhood (MS).	Storage no higher than five (5’) feet, screened by site-obscuring fence or evergreen hedge six (6') feet in height.
Mixed Use Neighborhood (MX) and Regional Activity Center (RA).	Not allowed.
Institutional Campus (IC) and Industrial Employment (IE).	Storage no higher than five (5’) feet, screened on all sides by a site-obscuring fence or evergreen hedge six feet (6’) in height.
Heavy Industrial (HI).	Open storage facing a primary street or side street shall be screened.
Open Space (PO) and Natural Areas (NA).	Not allowed except for agricultural implements.

12. Heritage Trees.

a. Heritage tree inventory.

i. The city shall develop a Heritage Tree Inventory that shall satisfy the criteria of this section. The initial inventory shall be the responsibility of the Urban Forestry Commission as established under Chapter 12.02 VMC and shall be updated annually by the Commission. The City Council, Planning Commission, Urban Forestry Commission, neighborhood association, property owner, or any person may recommend to the city that a tree be designated a heritage tree.

ii. The heritage tree designation may be applied to a tree or grove of trees.

iii. The Urban Forestry Commission shall process additions or changes to the inventory by means of a Type III process as set forth in Section 20.210.060 VMC. In addition to other required notice, the city shall notify each property owner by certified or registered mail when a tree on the owner's property has been proposed for designation to the Heritage Tree Inventory. The notice and a response form shall be mailed at least thirty (30) calendar days prior to the public hearing. If the owner of the property objects to such designation in writing to the Urban Forestry Commission prior to the public hearing or at the public hearing, the designation procedure shall not proceed.

iv. After the commission completes its hearing, it shall add the designated tree(s) to the Heritage Tree Inventory if it meets the criteria found in subsection 2 below. Decisions of the Urban Forestry Commission may be appealed by any aggrieved party as set forth in Section 20.210.130 VMC.

b. *Criteria.* For any individual tree or grove of trees to be listed as a heritage tree(s), it must be in an apparently healthy growing condition and one (1) or more of the following exist:

i. The tree has a DBH of thirty-six (36") inches or greater;

ii. The tree is included in the City of Vancouver Heritage Tree Inventory as established by the Urban Forestry Commission based on one (1) or more of the following criteria:

(A). The tree has a distinctive size, shape, or location, or is of a distinctive species or age which warrants a Heritage Tree status; or

(B). The tree possesses exceptional beauty which warrants a Heritage Tree status; or

(C). The tree is distinctive due to a functional or aesthetic relationship to a natural resource, such as trees located along stream banks or trees located along ridge lines; or

(D). The tree has a documented association with a historical figure, property, or significant historical event.

c. A grove may be considered for Heritage Grove Status if it is in a healthy growing condition and one or more of the following criteria:

   i. The grove is relatively mature and is of a rare or unusual nature containing trees that are distinctive either due to size, shape, species or age; or

   ii. The grove is distinctive due to a functional or aesthetic relationship to a natural resource, such as trees located along stream banks, or trees located along ridge lines; or

   iii. The grove has documented association with a historical figure, property, or significant historical event.

d. Heritage tree development review.

   i. When development is proposed for property which contains a heritage tree, and the Planning Official determines that the proposed development may affect a heritage tree, the property owner must have a tree preservation plan prepared by a qualified arborist demonstrating how the heritage tree will be protected and preserved. A heritage tree shall be preserved unless the Urban Forestry Commission determines that the tree may be removed based on the criteria for heritage tree removal found in Subsection 5 below.

   ii. A tree preservation plan shall be composed of the following:

      (A). A site plan indicating the location of heritage trees.

      (B). The methods to be used to preserve the heritage trees.

      (C). If a heritage tree is proposed for removal, a narrative statement outlining the reasons why the heritage tree should be removed from the inventory.

      (D). A mitigation plan indicating the replacement of trees or additional new trees to be placed on the site. The mitigation plan should demonstrate, to the extent possible, that the character of the site will not substantially change as the result of development.

   iii. Site design adjustments may be allowed in some cases, as follows:

      (A). The Planning Official may grant a variance to front, side, and/or rear yard setback standards by up to twenty (20%) percent to retain a heritage tree(s). The adjustment shall be the minimum necessary to accomplish preservation of trees on site and shall not conflict with the City Adopted Building Code or other adopted ordinances or conditions placed on the property.

(B). The Planning Official may grant a ten percent (10%) percent variance to the identified Building Type's lot dimensions and coverage, and building placement and buildout in approving a short plat or other land division if necessary to retain heritage trees. The Planning Official may accept a preliminary plat application and recommend approval to the hearing body of a plat that provides for similar variance to lot dimensions and coverage standards if necessary to retain heritage trees.

e. Removal of a heritage tree.

i. Except as provided herein, no person may cut or remove a heritage tree without obtaining approval from the Urban Forestry Commission. The tree removal permit shall be approved if one of the criteria is satisfied:

(A). Retention of the tree would make reasonable use of the property allowed under the current zoning impractical or impossible in that the development would not be allowed to meet the minimum density allowed by the applicable zoning.

(B). The removal is necessary to accommodate a new improvement, structure or remodeled structure, and no alternative exists for relocation of the improvement on the site, or that variances to setback provisions of this Title will not allow the tree to be saved or will cause other undesirable circumstances on the site or adjacent properties.

(C). The tree is hazardous, diseased or storm damaged and poses a threat to the health, safety or welfare of the public.

(D). The tree has lost its importance as a heritage tree due to damage from natural or accidental causes, or is no longer of historic or natural significance.

(E). The tree needs to be removed to accomplish a public purpose and no practical alternative exists.

ii. The limb structure, or crown, of a heritage tree may be pruned in any one-year period without obtaining approval from the Urban Forestry Commission, provided that at least eighty (80%) percent of the existing tree crown remains undisturbed.

iii. Any person who wishes to prune a heritage tree in excess of twenty (20%) percent of the existing crown shall obtain approval from the Urban Forestry Commission subject to the following conditions:

(A). The protected tree shall be pruned following acceptable arboricultural standards.

(B). The tree shall be pruned in a manner that ensures safety to public and private property and shall be done by a qualified arborist.

13. *Nuisance Trees.* A nuisance tree shall meet the following criteria:
    a. Tree is causing obvious, physical damage to private or public property, including but not limited to: sidewalk, curb, road, parking lot, building foundation, or roof unless it can be corrected by reasonable practices, including but not limited to those described in subsection 3;
    b. Tree has been damaged by past maintenance practices, that cannot be corrected with proper arboricultural practices; or
    c. The problems associated with the tree must be such that they cannot be corrected by any other reasonable practice. Including but not limited to the following:
        i. Pruning of the crown or roots of the tree and/or, structural changes to a building, parking lot, sidewalk or other site modifications such as correcting hardscape damage to alleviate the problem.
        ii. Pruning, bracing, cabling, to reconstruct a healthy crown.
        iii. Maintenance such as but not limited to gutters, roof and landscape maintenance.
14. *Hazard Tree Criteria.* A hazard tree must meet the following criteria as determined by a Certified Arborist that is tree risk assessment qualified:
    a. The tree must have high or extreme overall risk rating over the next five years timeframe according to a tree risk assessment using International Society of Arboriculture standards; and
    b. The risk cannot be reduced to a low or moderate overall risk rating with reasonable and proper arboricultural practices or target protection, removal or relocation.
15. *Undeveloped properties, conversion option harvest.* For properties proposing a conversion option harvest, the following standards shall apply:
    a. Trees to remain should be dominant or co-dominant in the stand, healthy and wind-firm.
    b. Trees to remain should be located on the site in areas that would most likely facilitate their preservation through the build-out of the site.
    c. Up to thirty (30%) percent of the number or volume of trees, by species, can be removed every ten (10) years.
    d. No removal of trees from designated sensitive areas, unless otherwise outlined by this title.
    e. No removal of designated heritage trees.
    f. No removal of trees that would cause trees on adjacent properties to become hazardous.

g. Logging operations shall be conducted so as to expose the smallest practical area of soil to erosion for the least possible time. To control erosion, shrubs, ground cover and stumps shall be retained where feasible. Where not feasible, appropriate erosion control practices shall be implemented pursuant to Chapter 14.24 VMC, Erosion Control.

h. Slash abatement practices shall be implemented pursuant to Vancouver Fire Department standards.

i. Stocking levels are acceptable if a minimum of two-hundred (200) tree units per acre of well distributed, vigorous, undamaged trees are established on the site. This requirement includes both existing and newly planted trees.

j. Species chosen for planting shall be suited to the constraints of the site including, but not limited to: soils, available moisture, topography, light conditions, existing and potential disease.

k. Trees shall be planted during the next planting season (October-March) after the harvesting operation is finished.

16. Water Conservation Standards.

a. *Applicability.* In order to ensure efficient water use in landscaped areas, the following standards shall be applied to all landscaping associated with Building Types that contain Active Retail Uses, Civic / Institutional Uses, Industrial, Office Uses, Open Space Uses, Passive Retail Uses, and Residential Uses with more than six (6) dwelling units and/or commonly-owned or maintained areas.

b. Plant selection and use limitation.

i. Minimize the amount of irrigated turf.

ii. Turf, high-water-use plantings (e.g. annuals, container plants) and water features (e.g. fountains, pools) shall be considered high-water-uses and shall be limited to not more than twenty-five (25%) percent of the projects landscaped area.

iii. Plants selected in all areas not identified for turf or high-water-use plantings shall include native vegetation or be well-suited to the climate, soils, and topographic conditions of the site, and shall be low water use plants once established.

iv. Plants having similar water use shall be grouped together in distinct hydrozones and shall be irrigated with separate irrigation circuits.

v. No turf or high-water-use plants shall be allowed on slopes. Slopes shall be revegetated with native trees, shrubs, and groundcover.

vi. No turf or high-water-use plants shall be allowed in areas eight (8) feet wide or less except public right-of-way planter strips.

vii. No turf shall be installed within Tree, Vegetation, and Soil Protection Areas.

viii. Landscaped areas shall consist of at least seventy-five (75%) percent of vegetative cover.

c. Water efficient landscape (xeriscape) standards.

i. As an alternative to traditional landscaping, the City encourages the use of xeriscape practices, which minimize the need for watering or irrigation. Xeriscape principles can be summarized as follows:

(A). Using plants with low moisture requirements;

(B). Selecting plants for specific site microclimates that vary according to slope, aspect, soil, and exposure to sun and moisture;

(C). Using native, noninvasive, adapted plant species;

(D). Minimizing the amount of irrigated turf;

(E). Planting and designing slopes to minimize storm water runoff;

(F). Use of separate irrigation zones adjusted to plant water requirements and use of drip or trickle irrigation systems.

(G). Using mulch in planted areas to control weeds, cool the soil and reduce evaporation; and

(H). Emphasizing soil improvement, such as deep tilling, adding organic matter and other amendments based on soil tests.

ii. *Appropriate plant species.* Trees and plants used in xeriscape plantings pursuant to this Section shall:

(A). Be appropriate for the ecological setting in which they are to be planted;

(B). Have noninvasive growth habits;

(C). Encourage low maintenance and sustainable landscape design

(D). Be commercially available;

(E). Not be plant material that was collected in the wild; and

(F). Be consistent with the purpose and intent of this Section.

iii. *Native vegetation.* Within xeriscape areas, a minimum of fifty (50%) percent native plants shall be used.

iv. *Prohibited species.* The City shall maintain a list of prohibited species, which are invasive or noxious. Where such species already exist, their removal shall be a condition of development approval.

v. Additional planting standards.

(A). For xeriscape areas, soil samples shall be analyzed to determine what soil conditioning or soil amendments should be used at the time of planting. Soil conditioning measures shall be adequate for the plant species selected.

(B). Trees, shrubs, perennials, perennial grasses and groundcovers shall be located and spaced to accommodate their mature size on the site.

vi. *Plant replacement.* The developer shall maintain xeriscape plantings for a two (2) year period from the date of planting. Within the two (2) year period, the developer shall replace or otherwise guarantee any failed plantings:

(A). Dead or dying trees or shrubs shall be replaced; and

(B). Plantings of perennials, perennial grasses or groundcovers shall be replanted to maintain a maximum twenty (20%) percent mortality rate from the date of planting.

d. *Stormwater.* Applicants are encouraged to incorporate landscaping into the on-site stormwater treatment system where determined to be appropriate.

D. Landscape and Tree, Vegetation and Soil Plan Requirements

All non-exempt development applications shall submit landscape, tree, and soil preservation and planting plans for approval with the associated land use application. Such plans may be prepared separately or combined provided it is legible.

1. Landscape Plan Requirements.

a. *General.* Any development, except individual lots for Building Types containing up to six (6) dwelling units, requiring landscape installation shall require the submission of a landscape development plan. The landscape development plan shall become part of the Site Plan required elsewhere in this Title for the purposes of review, approval, and compliance for any land use development permit, building permit and/or certificate of occupancy.

b. *Information Required.* Landscape plans shall contain the following information:

i. North arrow, scale, date, title, and name of owner;

ii. Accurate site plan (at a scale of 1" = 20' or larger, or as appropriate for the scale of development) showing the location of property lines and their dimensions;

iii. Existing and proposed water courses, drainage features, streets, sidewalks, utility lines and easements, and other public or semi-public improvements within or adjacent to the site;

iv. Delineation of existing residential structures, if any, on adjacent properties;

v. All existing plant material to be removed or retained and delineation and specification of protection methods for plant materials to be retained;

vi. Existing and proposed elevations at sufficient locations of the site to show drainage patterns;

vii. Contour lines when the slope exceeds six (6%) percent;

viii. Existing and proposed buildings and other structures, paved areas, curbs, walks, light standards, signs, fences and screen walls, and other permanent features to be added and/or retained on the site;

ix. Calculation of total site area, setback areas, required buffer areas, paved vehicular use areas, required proportional landscape areas, and required plant quantities and types;

x. Location, type, and quantity of any soil amendments;

xi. The location, approximate mature size, and type of all plant materials graphically depicted on the plan;

xii. Complete description of plant materials shown on the plan, including common and botanical names, quantities, spacing, container or caliper size at installation, and mature height and spread;

xiii. Irrigation plans showing location and type of all outlets (spray, bubbler, drip, etc.); location and size of water meter or other connection; location, type, and installation details of backflow prevention device; and delineation of each watering zone or circuit; and

xiv. Landscape areas where xeriscape principles are to be applied shall be clearly delineated in the plan submittal; and native and nonnative species plants should be clearly distinguished;

xv. Calculations demonstrating conformance with applicable parking lot soil and tree canopy standards (20.450.035.C.5.b. and 20.450.035.C.7.), site tree density standards (20.450.035.C.6), site tree canopy standards(20.450.006.030.C), cool site surfaces standards (20.450.035.C.8), and street tree standards (20.450.035.C.9).

2. *Tree, Vegetation, and Soil Plan Requirements.* The basic components of a tree, vegetation, and soil plan are a site plan with existing vegetation and proposed site activity, indication of the trees to be retained and removed based on the activity, location of trees for mitigation if required, and a description of protection during construction of trees, native vegetation, and healthy soils to be preserved. The health condition of each tree shall be assessed using the following categories: 1. Good (no significant health issues); 2. Fair (moderate health issues but likely viable for the foreseeable future); 3. Poor (significant health issues and likely in decline); and 4. Very poor or dead (in severe decline or dead). The scale of the project and the size and quantity of trees proposed for removal, preservation, and planting will determine which level of tree, vegetation, and soil plan is required. Table 20.450.035-7 lists activities or projects and the level of tree, vegetation, and soil plan typically required.

TABLE 20.450.035-7. LEVEL TREE PLAN REQUIRED FOR PROJECTS OR ACTIVITIES

	Project or Activity	Level
1.	Proposed short plat, residential projects with 1-6 units, and existing projects with 1-6 units proposing site disturbance	I
2.	Proposed Active Retail Uses, Industrial Uses, Office Uses, Passive Retail Uses, and Residential Uses with over six (6) dwelling units, parks, conditional uses, proposing a building addition or other site disturbance.	II
3.	Nuisance or hazard tree removal permit.	III
4.	Proposed subdivisions with Building Types having Residential Units, planned developments, Building Types with Active Retail Uses, Industrial Uses, Office Uses, Passive Retail Uses, and Residential Uses with over six (6) dwelling units, parks, and conditional uses with no impact on trees.	IV
5.	Proposed subdivisions with Building Types having Residential Units, planned developments, Building Types with Active Retail Uses, Industrial Uses, Office Uses, Passive Retail Uses, and Residential Uses with over six (6) dwelling units, parks, and conditional uses in which trees are removed or will be impacted.	V
6.	Conversion option harvest permit.	VI
7.	Undeveloped parcels.	VII

a. *Level I Tree, Vegetation, and Soil Plan.* A Level I tree, vegetation, and soil plan is required for proposed Building Types with one (1) dwelling unit, short plats, Building Types with two (2) to six (6) dwelling units, or applicable Building Types with one (1) dwelling unit and Building Types with two (2) to six (6) units proposing site disturbance. The plan must be developed with the assistance of a qualified professional, such as a Certified Arborist. A Level I tree vegetation, and soil plan shall include the following components:

i. *Site plan.* The site plan shall show the footprint of the Building Types, house(s), driveway(s), streets and any other improvements and grading, and the health condition, size (DBH), species and location of trees to be removed and retained.

ii. *Tree, vegetation, and soil protection.* If existing trees are to be retained and their critical root zone is within construction or disturbance areas, a tree, vegetation, and soil protection plan must be submitted.

iii. *Tree planting plan.* The plan showing species of trees proposed for planting shall include location, size, and number of trees.

iv. *Tree density, Minimum Tree Canopy Coverage, and Mitigation Costs.* Plan shall include: area of site for tree density, tree density calculation for the existing trees to be preserved, trees to be removed, mitigation cost calculations, tree density calculation for trees proposed for planting, and minimum tree canopy percentage calculations.

b. *Level II Tree, Vegetation, and Soil Plan.* A Level II tree, vegetation, and soil plan is required for existing buildings with Active Retail Uses, Industrial Uses, Office Uses, Passive Retail Uses, and Residential Uses with more than six (6) dwelling units, parks, conditional use sites proposing an addition or site disturbance. It can be developed by the applicant but may require the assistance of a qualified professional. A Level II tree, vegetation, and soil plan shall include the following components:

i. *Site plan.* The site plan shall show the existing conditions and any new additions or site disturbances, and the health condition, size (DBH), species, and location of trees to be removed and retained as typically required for site plan review.

ii. *Tree, vegetation, and soil protection.* If the proposed changes to the site will be within the critical root zone of any existing tree on site a tree, vegetation, and soil protection plan will be required. This plan shall be included on the grading plan, and shall include the following information:

(A). Locations of existing tree(s) potentially impacted by the proposed site changes.

(B). Assessment of the potential damage to the tree(s) by a qualified professional.

(C). Any required measures to ensure protection of trees, vegetation, and soil to be preserved.

iii. *Tree planting plan.* The planting plan shall include the following information:

(A). Location, size, species, and numbers of trees to be planted.

(B). Narrative description and detail showing any site preparation, installation and maintenance measures, necessary for the long-term survival and health of the trees.

(C). Timeline for site preparation, installation and maintenance of plant materials.

(D). Cost estimate for the purchase, installation and three-year maintenance of trees.

iv. *Tree density, Minimum Tree Canopy Coverage and Mitigation Costs.* Plan shall include area of site for tree density, tree density calculation for the existing trees to be preserved, trees to be removed, mitigation cost calculations, tree density calculation for trees proposed for planting, and minimum tree canopy percentage calculations.

c. *Level III Tree, Vegetation, and Soil Plan.* A Level III tree, vegetation, and soil plan is required for the removal of any nuisance tree or for determination of a hazard tree. The plan must be developed with the assistance of a Certified Arborist. See VMC 20.450.035.C.13 for nuisance and VMC 20.450.035.C.14 for hazard tree removal criteria. A Level III tree, vegetation, and soil plan shall include the following components:

i. *Site plan.* The site plan shall show the approximate location of the tree(s), buildings, and any other pertinent site improvements.

ii. *Arborist Report or Narrative report.* An Arborist report or narrative shall include:

(A). The species, size (DBH), location and overall health and structure of the tree(s) in question.

(B). Description of the problems associated with the tree including, how the tree meets the nuisance or hazard tree removal criteria, which may include tree risk assessment, past history of problem, methods attempted to alleviate the problems and recommendations.

iii. *Tree replacement plan.* Location and species of tree(s) proposed for replacement planting. The replacement would be one tree unit per tree removed. Replacement trees shall be of similar genetic potential unless determined by the Planning Official. The plan shall include a timeline for installation of the required trees, and a cost estimate for the purchase, installation and three (3) year maintenance of the trees

d. *Level IV Tree, Vegetation, and Soil Plan.* A Level IV tree, vegetation, and soil plan is required for proposed subdivisions with Residential Uses, Active Retail Uses, Industrial Uses, Office Uses, Passive Retail Uses, and Residential Uses with more than six (6) dwelling units, parks, and sites that do not have any existing trees or where existing trees will not be impacted nor pose a hazard to the proposed project. The plan must be developed with the assistance of a qualified professional such as a Registered Landscape Architect or Certified Arborist. A Level IV tree, vegetation, and soil plan shall include the following components:

i. *Site plan.* The site plan shall have the following information:

(A). Approximate locations of any existing trees on site.

(B). Species, size (DBH) and health condition of trees to be retained.

ii. *Planting plan.* The planting plan shall include the following information:

(A). Location, size, species and numbers of trees to be planted.

(B). Narrative description and detail showing any site preparation, installation and maintenance measures, necessary for the long-term survival and health of the trees.

(C). Timeline for site preparation, installation and maintenance of trees.

(D). Cost estimate for the purchase, installation and three years' maintenance of trees.

iii. *Tree density and minimum tree canopy coverage.* Calculations on the landscape or tree plan shall include: area of site for tree density, tree density calculation for the existing trees to be preserved, and tree density calculation for trees proposed for planting and minimum tree canopy percentage calculations.

e. *Level V Tree, Vegetation, and Soil Plan.* A Level V tree, vegetation, and soil plan is required for proposed residential subdivisions, commercial, industrial, multifamily (7 units or more), parks, conditional use sites in which existing trees are proposed for removal, could be damaged by construction activities, and/or could become hazardous. The plan must be developed with the assistance of a qualified professional, such as a Certified Arborist. The plan shall include the following information:

i. *Site plan.* Drawn to scale on the site plan shall be a map delineating vegetation types. Each type shall include the following information:

(A). Average number of trees and basal area per acre, by species and two-inch diameter class for significantly wooded areas, which all or a portion of the stand is to be retained. For nonforested areas with individual trees, provide an inventory including size (DBH), species and health condition of each tree and a general description of the vegetation present.

(B). Narrative description of the potential for tree preservation for each vegetation type, and for individual trees that are or will be standalone. This report shall include soils, wind throw potential, insect and disease problems, and approximate distance to existing and proposed targets.

(C). Description of any off-site tree or trees which could be adversely affected by the proposed activity, and the proposed mitigation for such impact.

ii. *Tree, vegetation, and soil protection plan.* Drawn to scale on the grading and erosion control plans the tree, vegetation, and soil protection plan shall be made for trees to be preserved. It shall include the following information:

(A). Surveyed locations, conducted by a surveyor licensed by the state of Washington, of perimeters of groves of trees or tree tracts and individual trees to be preserved outside of groves or tree tracts, adjacent to the proposed limits of construction. General locations of trees proposed for removal. The critical root zones of trees to be preserved shall be shown on the plan.

(B). Limits of construction and existing and proposed grade changes on site.

(C). Narrative description, graphic detail of tree, vegetation, and soil protection, and tree maintenance measures required for the preservation of existing trees to be preserved.

(D). Timeline for clearing, grading and installation of tree, vegetation, and soil protection measures.

iii. *Tree planting plan.* The planting plan shall include the following information:

(A). Location, size, species and numbers of trees to be planted.

(B). Narrative description and detail showing any site preparation, installation and maintenance measures, necessary for the long-term survival and health of the trees.

(C). Timeline for site preparation, installation and maintenance of trees.

(D). Cost estimate for the purchase, installation and three years' maintenance of trees.

iv. *Tree Density, Minimum Tree Canopy Coverage, and Mitigation Costs.* The following information shall be included on the landscape or tree plan: area of site for tree density, tree density calculation for the existing trees proposed for preservation, trees to be removed, mitigation costs calculations, and tree density calculation for trees proposed for planting and minimum tree canopy coverage calculations.

f. *Level VI Tree, Vegetation, and Site Plan.* A Level VI tree, vegetation, and soil plan is required for a conversion option harvest permit. The plan shall be developed by a qualified professional. A Level VI tree, vegetation, and soil plan shall include the following components:

i. *Forest inventory.* The professional tree inventory shall include:

(A). A statistically accurate inventory and a stand stocking table showing the number of trees per acre, basal area per acre, and volume per acre by species and six (6") inch diameter class.

(B). A map showing the locations of existing vegetation types delineated by forest type.

(C). A map showing the location and a description of trees growing on adjacent property which may be jeopardized by the proposed activity.

(D). A map showing any sensitive areas and the required sensitive area buffers, as defined in Section 20.720 VMC, Critical Areas and 20.730 VMC, Shoreline Management, and in the Shoreline Management Master Program.

(E). A map showing the location and a description of any heritage trees as defined in herein.

ii. *Harvest plan.* The harvest plan shall include:

(A). A description of the harvesting method.

(B). A map showing the locations of trees proposed for removal, skid roads and landings.

(C). A stand stocking table showing the volume, number, basal area, and species of trees proposed for removal.

(D). Slash abatement plan, pursuant to Vancouver fire department standards.

(E). An erosion control plan, pursuant to Chapter 14.24 VMC, Erosion Control.

iii. *Reforestation/tree planting plan.* The reforestation plan shall include:

(A). Location, size, species and numbers of trees to be planted.

(B). Narrative description and detail showing site preparation, installation and maintenance measures necessary for the long-term survival and health of the trees.

(C). Timeline for site preparation, installation and maintenance of trees.

(D). Cost estimate for the purchase, installation and three years' maintenance of trees.

iv. *Tree density.* The following information shall be included: area of site for tree density, tree density calculation for the existing trees proposed for retention, tree density calculation for trees proposed for planting.

g. *Level VII Tree, Vegetation, and Soil Plan.* A Level VII tree, vegetation, and soil plan is required for tree removal above the six-trees-per-acre limit on undeveloped properties. It can be developed by the applicant but may require the assistance of a qualified professional. A Level VII tree, vegetation, and soil plan shall include the following information:

i. *Site plan.* The site plan shall show the approximate location of the tree(s), buildings, and any other pertinent site improvements. It shall also list species, size (DBH) and health condition of the tree.

ii. *Narrative report.* The report shall include the following:

(A). The species, size (DBH), and health condition of the tree(s) in question.

(B). Description of the reason for removal with short-term and long-term goals.

iii. *Planting plan.* Location and species of trees proposed for replacement planting. This shall include a timeline for installation of the required trees, and a cost estimate for the purchase, installation and three (3) years' maintenance of the trees.

iv. *Tree density, Minimum Tree Canopy Coverage, and Mitigation Costs.* Tree density calculations on the site plan shall include the density of the trees proposed for removal, mitigation cost calculations, tree density calculations for trees proposed for planting, and tree canopy percentage calculations.

E. Standalone Tree Removal Permit Review Procedure.

1. Timeline and action. Tree permit applications submitted separate from a development application shall be processed as a Type I action within the timelines and procedures established by Section 20.210.040 VMC except that a notice of applications shall be posted on the site as required by subsection 20.450.035(E).

2. Public Notice. For tree permit applications and plans submitted separate from a development application, a notice of application shall be posted on the site within seven (7) calendar days after the application is accepted as fully complete. The notice shall be posted in a place on the property that is clearly visible to passersby. The notice of application shall contain the name of the applicant, a description of the tree removal proposal, the case number assigned by the City of Vancouver, and the name and phone number of the city staff person assigned to review the application. The notice shall remain on the site for a period of fourteen (14) calendar days.

3. *Permit Duration.* A permit issued under this Chapter shall be valid for one hundred and eighty (180) days or the duration of the associated development permit or approval. The Planning Official may authorize a one hundred and eighty (180) day extension.

4. *Permit Amendments.* The permittee may request an amendment to an approved permit. In addition, the Urban Forester may require minor project changes to protect drainage-ways, sensitive areas, floodplains and wellhead protection areas, and adjoining property and structures from damage or to alleviate hazardous conditions as they relate to the trees.

F. Tree, Vegetation, and Soil Protection During Construction.

During construction. Prior to initiating tree removal on the site, soils, vegetated areas and individual trees to be preserved shall be protected from potentially damaging activities pursuant to the following standards.

1. Placing Materials Near Trees.

a. No person may conduct any activity within the protected area of any tree designated to remain, including, but not limited to, parking equipment, placing solvents, storing building material and soil deposits, dumping concrete washout and locating burn holes.

b. During construction, no person shall attach any object to any tree designated for protection.

2. *Protective Barrier.* Before development, land clearing, filling or any land alteration for which a Tree Removal Permit is required, the applicant:
    a. Shall erect and maintain readily visible protective tree fencing along the outer edge and completely surrounding the protected area of all protected trees or groups of trees that are to remain undisturbed. Fences shall be constructed of chain link and at least four feet high, unless other type of fencing is authorized by the Planning Official.
    b. Shall prohibit excavation or compaction of earth or other potentially damaging activities within the barriers.
    c. Shall maintain the protective barriers in place until the Planning Official authorizes their removal or a final certificate of occupancy is issued, whichever occurs first
    d. Shall ensure that any landscaping done in the protected zone subsequent to the removal of the barriers shall be accomplished with light machinery or hand labor. No turf or lawn areas are to be installed within protected area.
    e. In addition to the above, the Planning Official may require the following:
        i. Cover with mulch to a depth of at least six (6”) inches or with plywood or similar material the areas adjoining the critical root zone of a tree in order to protect roots from damage caused by heavy equipment.
        ii. Minimize root damage by excavating a two (2’) foot deep trench, at edge of critical root zone, to cleanly sever the roots of trees to be retained.
        iii. Have corrective pruning performed on protected trees in order to avoid damage from machinery or building activity.
        iv. Maintain trees throughout the construction period by watering and fertilizing.
3. Grade.
    a. The grade shall not be elevated or reduced within the critical root zone of trees to be preserved without the Planning Official’s authorization. The Planning Official may allow coverage of up to one half of the area of the tree’s critical root zone with light soils (no clay) to the minimum depth necessary to carry out grading or planting plans, if it will not imperil the survival of the tree. Aeration devices may be required to ensure the tree’s survival.
    b. If the grade adjacent to a preserved tree is raised such that it could slough or erode into the tree’s critical root zone, it shall be permanently stabilized to prevent suffocation of the roots.

c. The applicant shall not install an impervious surface within the critical root zone of any tree to be retained without the authorization of the Planning Official. The Planning Official may require specific construction methods and/or use of aeration devices to ensure the tree's survival and to minimize the potential for root induced damage to the impervious surface.

d. To the greatest extent practical, utility trenches shall be located outside of the critical root zone of trees to be retained. The Planning Official may require that utilities be tunneled under the roots of trees to be retained if the Planning Official determines that trenching would significantly reduce the chances of the tree's survival.

e. Trees and other vegetation to be retained shall be protected from erosion and sedimentation. Clearing operations shall be conducted so as to expose the smallest practical area of soil to erosion for the least possible time. To control erosion, shrubs, ground cover and stumps shall be maintained on the individual lots, where feasible. Where not feasible appropriate erosion control practices shall be implemented pursuant to VMC Chapter 14.24.

4. *Directional felling.* Directional felling of trees shall be used to avoid damage to trees designated for retention and shall be conducted so as to expose the smallest practical area of soil to erosion for the least possible time. To control erosion, shrubs, ground cover and stumps shall be retained where feasible. Where not feasible, appropriate erosion control practices shall be implemented pursuant to VMC Chapter 14.24, Erosion Control.

5. *Additional requirements.* The Planning Official may require additional tree protection measures which are consistent with accepted best management practices.

G. Installation and Maintenance.

1. *Installation requirements.* The installation of all landscaping shall be as follows:

a. All landscaping shall be installed according to accepted planting procedures;

b. The plant materials shall be of high grade, and shall meet the quality and size standards of the American Standards for Nursery Stock (ANSI Z60 as updated); and

c. All landscaped areas, including islands and street trees shall be provided supplemental water with an automated irrigation system.

d. All landscaped areas shall be provided with a six (6") inch curb which could include curb cuts, wheel stops or other protective measure to allow for stormwater flow as part of LID.

e. Landscaped areas shall have a minimum length or width dimension of five (5') feet in order to count toward the minimum required landscaped area.

f. Soils, soil conditioning and mulching.

i. A minimum of twelve (12”) inch depth of non-mechanically compacted soil shall be available for water absorption and root growth in planted areas.

ii. A minimum of a four (4”) inch layer of porous mulch shall be applied to all exposed soil surfaces of nonturf areas within the landscape area except for a three (3”) radius from the trunk of the trees. Plant types that are intolerant of mulch shall be exempt from this requirement. Non-porous material, such as plastic sheeting, shall not be placed under the mulch. However, porous landscape fabric is permitted.

iii. Areas that have been cleared, graded, or compacted and that have not been covered by impervious surface, incorporated into a drainage facility or engineered as structural fill or slope shall be amended with organic matter.

2. *Maintenance.* Unless otherwise provided by the lease agreement, the owner, tenant and their agent, if any, shall be jointly and severally responsible for the maintenance of all landscaping and screening, which shall be maintained in good condition so as to present a healthy, neat and orderly appearance, shall be replaced or repaired as necessary, and shall be kept free from refuse and debris.

   a. Trees, vegetation, and soils are to be properly maintained in a vigorous and healthy condition, free from diseases, pests and weeds. Competing vegetation shall be controlled to the extent necessary to allow establishment, survival, and growth of planted trees. To ensure that competing vegetation is properly controlled, the Planning Official may require the use of mulch, weed control fabric, tree shelters, and/or other measures deemed necessary.

   b. Trees and groundcover vegetation which become diseased, severely damaged or which die shall be removed by the owner as soon as possible but no later than sixty (60) days after notification by the city. All trees and groundcover vegetation removed under this section shall be replaced with healthy trees and vegetation of the same size, species, and planting standards as required by the approved landscaping, tree, vegetation, and soil plan for the property unless otherwise approved by the Planning Official.

   c. Cool site features provided in accordance with 20.450.035(C)(8), including but not limited to paving, shading structures and vegetation, shall be maintained. Vegetative features shall be maintained in accordance with 20.450.035(G)(2). Non-vegetative features shall be kept clean and shall be repaired in kind if damaged or deteriorated.

3. *Maintenance as a Condition of Plat Approval.* In development with Building Types and Residential Uses that exceeds four (4) lots, soils, vegetation, mitigation trees, retained trees, and areas dedicated as tree tracts shall be properly maintained and retained unless removal is approved by the Planning Official. The tree, vegetation, and soil plan shall be a condition of plat approval and on the face of the plat.

4. Building Types with Residential Uses having more than six (6) dwelling units, or Active Retail Uses, Industrial Uses, Office Uses, Passive Retail Uses, or Conditional Uses. For all soils, vegetation, and trees covered by the landscape, tree, vegetation, and soil plan, the maintenance requirement shall apply in perpetuity to developments that are developments in excess of six (6) dwelling units, Active Retail Uses, Office Uses, Passive Retail Uses, and Industrial Uses. The applicant shall execute a covenant in a form agreeable to the city which shall require that the applicant and his successors comply with the maintenance requirement imposed by this section. The covenant shall be binding on successor property owners and owners' associations. The covenant shall be recorded by the county auditor. The recording fee shall be paid by the applicant.
5. *Conversion.* For Conversion Option Harvest sites, the minimum stocking of the site, as established in this chapter, shall be maintained. Failure to maintain minimum stocking as required constitutes a violation of this chapter. Additionally, failure to comply with the conditions established in the conversion harvest option plan may result in reinstatement of the six (6) year moratorium on development as established in Chapter 222-20 WAC.
6. *Maintenance agreement.* Each development to which the maintenance requirement for this Chapter applies and that contain protected areas shall also be subject to a maintenance agreement. The Planning Official shall require the applicant to execute a maintenance agreement with the City, in a form acceptable to the city attorney, which shall include the provisions of the maintenance requirement in this Chapter, to ensure the survival and proper care of any soils, vegetation, and trees identified in the tree, vegetation, and soil plan.
7. *Required pruning.* Pruning shall be performed on newly planted broadleaf trees pursuant to the following schedule and standards.
    a. Pruning of broadleaf trees shall be performed on newly planted deciduous trees pursuant to the following schedule and standards.
        i. *Year 1.* Only dead, broken or crossing branches shall be pruned when the tree is planted.
        ii. *Year 2.* Prune pursuant to national arborist organization standards following natural pruning system to remove broken branches and establish a central leader.
        iii. *Year 3.* Prune pursuant to national arborist organizations standards following natural pruning system to establish proper scaffold branching, raise the crown for road, sidewalk clearance and to remove any dead, dying or crossing branches.
    b. Pruning of coniferous trees shall be performed on newly planted conifer trees according to the following schedule and standards.
        i. *Year 1.* Only dead and broken branches and/or double leaders shall be pruned when the tree is planted.

ii. *Year 2.* The tree shall be pruned to encourage one (1) central leader. Lower branches shall be pruned as needed to provide clearance.

iii. *Year 3.* The tree shall be pruned to encourage one (1) central leader. Lower branches shall be pruned as needed to provide clearance.

8. *Vegetation Maintenance Bond*. A Vegetation Maintenance Bond (VMB) shall be provided by the applicant to guarantee all plant/vegetation maintenance (including street trees) associated with the project are maintained in an acceptable condition through the establishment period of three (3) years.

a. The VMB is required when the estimated cost for plants and labor (purchase, site preparation, installation and maintenance) is more than one thousand dollars ($1,000) as determined by a qualified professional and shall be one hundred and twenty-five (125%) percent of the estimated costs submitted per the final landscape plan and approved by the Urban Forester.

b. The VMB shall be in a form approved by the City Attorney executed by a surety company authorized to transact business in the state of Washington.

c. For subdivisions, plantings required in common areas, the VMB shall be submitted and accepted by the City prior to final plat recording.

d. For site plans, the VMB shall be submitted and accepted by the City prior to issuance of a certificate of occupancy.

e. The City may perform yearly inspections of the project to assure the maintenance is in an acceptable condition.

i. Following final inspection, the vegetation maintenance period begins immediately and continues for a period of three years. Successful maintenance will be considered at least eighty (80%) percent survival of planted trees, eighty (80%) percent survival of all other plant materials, and replacement of one hundred (100%) percent of trees and plant materials that did not survive based on a report by a qualified professional and approved by the City.

ii. If tree and plant establishment is not successful, the bond will not be released and the three (3) year establishment period will be reset for an additional three (3) years immediately following one hundred (100%) percent replacement of unsuccessful tree and plant materials. The VMB will be released after a three (3) year period of successful maintenance based on a report by a qualified professional and approved by the City.

iii. *Violation.* Failure to maintain the trees and landscaping as required shall constitute a violation of this Chapter and, if applicable, the plat covenant.

9. *Pruning required.* All plant growth in landscaped areas of developments shall be controlled by pruning, trimming or otherwise so that:
    a. It will not interfere with the maintenance or repair of any public utility;
    b. It will not restrict pedestrian or vehicular access;
    c. It will not constitute a traffic hazard because of reduced visibility; and
    d. Trees shall be pruned to provide at least eight (8') feet of clearance above sidewalks and thirteen (13') feet above a local street, fifteen (15') feet above a collector street, and eighteen (18') feet above an arterial street roadway surfaces.
10. *Certificate of Landscaping Installation.* A certificate from a licensed landscape architect shall be provided verifying that landscaping indicated on the final landscape plan has been installed accordance to the approved plans.
11. *Certificate of Occupancy.* Certificates of occupancy shall not be issued unless the landscaping requirements have been met or other arrangements have been made and approved by the Planning Official.
12. *Care of landscaping along public rights-of-way.* Appropriate methods for the care and maintenance of street trees and landscaping materials shall be provided by the owner of the property abutting the rights-of-way, unless otherwise required for emergency conditions and the safety of the general public.

H. City Tree Account.
    1. *Tree account funding sources.* All penalties and revenues received under this Chapter shall be placed into the city tree account. In addition, the following sources of funds may be placed in the city tree account:
        a. Sale of trees or wood from city property where the proceeds from such sale have not been dedicated to another purpose;
        b. Donations and grants for purposes of the fund;
        c. Sale of seedlings by the City;
        d. Civil penalties imposed under subsection 20.450.035(H) VMC or settlements in lieu of penalties. At the discretion of the city manager, costs incurred by the city to enforce this Chapter may be deducted from the civil penalties;
        e. Other monies allocated by the city council.
    2. *Tree account purposes.* The City shall use the city tree account for the following purposes:
        a. Acquiring, maintaining, and preserving wooded areas within the city;

b. Planting and maintaining trees within the city;

c. Identification and maintenance of heritage trees;

d. Propagation of seedling trees;

e. Urban forestry education;

f. Other purposes relating to trees as determined by the City Council

I. Enforcement of Violations and Penalties.

1. *General Requirements.* Enforcement shall be conducted in accordance with procedures set forth in Chapter 20.140. Special enforcement provisions related to tree conservation are set forth below. Special enforcement provisions related to tree conservation are set forth below.

2. *Authority.* It shall be the duty of the Planning Official to administer the provisions of this chapter. The Planning Official shall have authority to issue permits, impose conditions, enforce the provisions and requirements of this chapter and permits issued there under, and establish administrative procedures and guidelines, conduct inspections, and prepare the forms necessary to carry out the purposes of this Chapter.

3. Stop Work Orders/Permit Revocation.

a. The Planning Official shall suspend work or revoke a permit, as appropriate, if the Planning Official finds that:

i. The work is not authorized by a valid permit;

ii. Inaccurate information was used to obtain the permit;

iii. The permittee is not complying with the terms of the permit or approved plans;

iv. The work is, in the Planning Official's judgment, a hazard to property or public safety, is adversely affecting or about to adversely affect adjacent property or rights-of-way, a drainage way, watercourse, sensitive areas, stormwater facility, or tree, vegetation, and soil protection area or is otherwise adversely affecting the public health, safety, or welfare;

v. Adverse weather is causing significant problems on or off site; or

vi. The required project surety has been expended to the point that it no longer provides assurance of the completion of the project in compliance with the terms of the permit.

b. The Planning Official shall issue the permittee/violator a written notice specifying the nature of the violation or problem which must be remedied prior to resuming other work on the project.

4. Restoration.

   a. Violators of this chapter or of a permit issued thereunder shall be responsible for mitigation costs of unlawfully removed trees and restoring unlawfully damaged areas in conformance with a plan, approved by the Planning Official, which provides for repair of any environmental and property damage, and restoration of the site; and which results in a site condition that, to the greatest extent practical, equals the site condition that would have existed in the absence of the violation(s).

   b. Restoration costs will be based on the City appraised value of unapproved trees removed using the latest edition of Guide for Plant Appraisal (International Society of Arboriculture, Council of Tree and Landscape Appraisers). The amount of costs above the approved restoration plan will be paid into the tree account.

   c. Protected and retained trees that are removed in violation of an approved tree plan shall have the area beneath the tree drip lines maintained in an equivalent condition as before the violation in perpetuity through a deed restriction, conservation easement, or other protective instrument approved by the City.

   d. No new impervious surface, obstructions, or structures are permitted within a protected tree drip line unless approved by the City. Tree replacement planting shall be prioritized within the protected tree drip line to the maximum extent feasible to restore equivalent or greater functions and values as the removed tree(s).

5. *Prohibition of Further Approvals.* The city shall not accept, process, or approve any application for a subdivision or any other development permit or approval, or issue a certificate of occupancy for property on which a violation of this chapter has occurred until the violation is cured by restoration, a plan for mitigating has been agreed upon or other means accepted by the Planning Official and by payment of any penalty imposed for the violation.

6. Civil Penalty.

   a. A person who fails to comply with the requirements of this chapter or the terms of a permit issued hereunder, who undertakes an activity regulated by this chapter without obtaining a permit, or fails to comply with a stop work order issued under this chapter shall also be subject to a civil penalty as set forth in Table 20.450.035-8. Each day that a violation of the requirements of this chapter continues shall constitute a separate violation. In addition, each unlawfully destroyed tree shall constitute a separate violation.

   b. Any person who aids or abets in the violation shall be considered to have committed a violation for purposes of the civil penalty.

TABLE 20.450.035-8. CIVIL PENALTIES FOR VIOLATIONS

Types of Tree, Vegetation, and Soil Conservation Ordinance Violations	Fines per Violation
Any violation of the requirement of this chapter or any violation of a permit issued hereunder.	One thousand ($1,000) dollars per violation
Continued illegal removal of tree(s) following stop work order or receipt of other information from city that the tree removal activity is not permitted.	One thousand ($1,000) dollars per day
Removal of tree(s) without applying for or obtaining a city permit or approval.	One thousand ($1,000) dollars per tree

c. *Notice of penalty.* A civil penalty shall be imposed by a notice in writing, by certified mail with return receipt requested, or by personal service. The notice shall describe the nature and date of the violation and order the acts constituting the violation to cease and desist, and, when appropriate, require necessary corrective action within a specified time.

d. In addition to or in place of civil penalties, the City may bring injunctive, declaratory or other actions to enforce this chapter.

e. The provisions of this subsection shall apply to violations of this chapter in lieu of the provisions set forth in Section 20.140.030 VMC.

7. *Criminal Prosecution.* In addition to or in place of civil penalties, knowingly violating this chapter may be referred to the City Attorney's Office for criminal prosecution. Violations of this chapter constitute a misdemeanor, punishable by up to ninety days in jail and/or up to a one thousand ($1,000.00) dollar fine. "Knowingly" means that a person knows or acts knowingly or with knowledge when he or she is aware of a fact, circumstance or result which is described by this chapter as being a violation.

20.450.040 Off-Site Impacts

A. Purpose. The purpose of this chapter is to ensure that any development, redevelopment, or use of a property will have minimal adverse off-site impacts, both during and after construction. This is accomplished by ensuring that property owners comply with existing federal, state or city rules and regulations, where applicable, and, in the absence of such regulations, establishing clear and objective standards to govern the acceptable level of these impacts as measured at the property line.

B. General Provisions.

1. *Compliance with applicable state and federal regulations.* In addition to the regulations adopted in this chapter, each use, activity or operation within the City of Vancouver shall comply with the applicable federal and state regulations pertaining to noise, odor and discharge of matter into the atmosphere, or ground, sewer system, water bodies, or onto properties.
2. *Evidence of compliance.* In the case of new developments or modifications to existing developments, Planning Official may require submission of evidence demonstrating compliance with federal, state and local regulations and copies of necessary permits, and may impose conditions as necessary to ensure compliance with this chapter. In the case of existing uses, the Code Enforcement Official, upon receipt of a complaint and following an investigation into the complaint which confirms a violation, may impose conditions as necessary to ensure compliance with such regulations.
3. *Continuing obligation.* Continued compliance with this chapter, as well as federal, state and local regulations shall be the responsibility of the property owner and operator.

C. Performance Standards.

1. *Environmental Noise.* Unless otherwise exempted by WAC 173-60-050, no development or use may create noise impacts, measured at the property line of the receiving property that exceed the maximum environmental noise levels established by WAC 173-60-050 listed in Table 20.450.040-1 below. Where more than one use listed exists within a property as listed in the table below, for either the noise source or the receiving property, such as in a Mixed-Use Building Type, the more restrictive standard shall apply. Uses listed in Table 20.450.007.030-1 are provided by WAC 173-60-050 to establish maximum noise levels allowable, and as such, are interpreted to coincide with Chapter 20.430 VMC to mean: Residential uses as 20.430.040(A)(1) Residential Uses; Commercial uses as 20.430.040(A)(3) Active Retail Uses, 20.430.040(A)(2) Civic / Institutional Uses, 20.430.040(A)(4) Passive Retail Uses, and 20.430.040(A)(5) Office Uses; Industrial as 20.430.040(A)(6) Industrial Uses, and 20.430.040(A)(7) Infrastructure Uses.

TABLE 20.450.040-1. MAXIMUM PERMISSIBLE NOISE LEVELS

Noise Source	Receiving Property		
	Residential	Commercial	Industrial
Residential	55 dBA[1]	57 dBA	60 dBA
Commercial	57	60	65
Industrial	60	65	70

[1] Applicable to Home Occupation related activities only.

a. The above maximum noise levels shall be reduced by ten (10 dBAs) decibels between the hours of 10 p.m. and 7:00 a.m. for the receiving property. Also, at any hour of the day or night the applicable noise limitations above may be exceeded for any receiving property by no more than five (5 dBA) decibels for a total of fifteen (15) minutes in any one (1) hour period, or ten (10 dBA) decibels for a total of five (5) minutes in any one (1) hour period, or fifteen (15 dBA) decibels for a total of one and a half (1.5) minutes in any one (1) hour period.

b. Where potential noise impacts to adjacent uses from a proposed land use or development activity are identified, measures to mitigate such impacts may be imposed upon the land use or activity through the applicable review process, and may include: construction of a sound wall or fence; reorientation of buildings, parking and loading areas; and/or placement of berms and landscaping.

c. Sound walls shall meet the design standards of VMC 20.450.020 Fences and Walls.

d. Outdoor construction activity, including construction staging, shall occur no earlier than 7 a.m. and no later than 8 p.m., seven days a week.

e. Due to the negative effect excessive levels of environmental noise have upon the public health, safety and welfare, the noise standards set out in Table 20.450.007.030-1 are intended to apply to all uses in existence on the date of adoption of this ordinance and no right to maintain a use not in conformance with those standards shall exist.

2. *Off-site drainage.* No property may be graded, filled, or otherwise altered in a way that allows stormwater runoff to flow onto another property. All stormwater runoff shall be contained on-site and directed to an approved stormwater facility (such as an infiltration system) unless otherwise approved by the City, and such facility shall be maintained in proper working condition.

3. *Smoke and particulate matter.* No development or use may create air emissions that exceed the legal limits established by the Southwest Clean Air Agency (SWCAA).
4. *Light and glare.* No development or use shall create off-site glare impacts from direct or reflected light sources and shall adhere to outdoor lighting standards, per Section 20.450.070 VMC, Dark Sky Outdoor Lighting Requirements, and Title 17 VMC, Building Code. For new developments, the Planning Official may impose conditions which minimize potential off-site light and glare impacts, such as placement of light sources away from adjacent properties, requiring shields on lights, or reducing the number of lights to the minimum needed for safety and security. For existing sources of glare, the Code Enforcement Supervisor may require sources of glare to be shielded or redirected to minimize off-site glare. Due to the negative effect off-site light and glare have upon the public health, safety and welfare, the prohibition of off-site light and glare is intended to apply to all uses in existence on the date of adoption of this ordinance and no right to maintain a use creating off-site light and glare impacts shall exist.
5. *Vibration.* No development or use shall create off-site vibration impacts, discernible without instruments at the property line of the affected use.

20.450.045 Parking and Loading Revised

A. *Purpose.* The purpose of these standards is to provide for safe and complete connections to the transportation system, and safe on-site circulation for vehicles and active transportation including cycling, walking, and wheeling. In addition, these standards are intended to provide for adequate vehicle parking with appropriate landscaping.

B. Applicability of Provisions.

1. *General.* When land is used for motor vehicle and/or bicycle parking, the provisions of this chapter shall apply unless otherwise noted.
2. *Types of parking.* For the purposes of this chapter, there are three (3) types of parking:
    a. Accessory parking is associated with a specific development and primary use that is reserved for the use of the customers, residents, employees, students and/or visitors associated with the development.
    b. Non-Accessory Parking, is any private or public vehicle and bicycle parking, either paid or free, which is not accessory to a specific development, including public and private parking structures and lots; transit park-and-ride lots; and free-standing fleet vehicle parking lots, per the definition in Section 20.160.020 VMC. Non-accessory parking shall be subject to all of the design and development standards in this chapter.
    c. *Valet Parking.* The Planning Official may approve valet parking or stacked parking to meet a portion of the on-site parking requirement as appropriate for the use.

3. *New construction.* Prior to occupancy of a new structure within any zoning district, any off-street vehicle parking shall be provided in accordance with the design and development standards of this chapter.

4. *Availability.* The provided vehicle parking shall:

   a. Be available for the parking of operable passenger vehicles of residents, patrons and employees only;

   b. For nonresidential uses, it shall not be used for storage of vehicles or materials, or for fleet parking used in conduct of the business or use during regular business hours; and

   c. Not be rented, leased or assigned to any other person or organization, unless as part of a joint parking agreement per subsection 20.450.045(C)(2) VMC.

C. General Provisions.

1. Location of accessory vehicle parking in relation to the primary use. The location of off-street parking will be as follows:

   a. Whenever possible, the required accessory parking shall be located on the same site as the primary use to which it is accessory.

   b. When it is not feasible to locate all or part of the accessory parking on the same site, the following shall apply:

      i. Off-street accessory parking spaces for Building Types with up to six (6) dwelling units shall be located on the same lot with the dwelling(s), unless otherwise approved as part of a planned development, per Chapter 20.260 VMC.

      ii. Off-street accessory parking, when provided, for Building Types with more than six (6) dwelling units shall be located no more than six hundred (600') feet from the building that they serve.

      iii. Off-street accessory parking lots, when provided, for all other uses shall be located no further than one thousand (1,000') feet from the building or use that they are required to serve, measured in a straight line from the building with the following exceptions:

         (A). Open Space Uses per Chapter 20.430. VMC, where no maximum distance requirements are established.

         (B). Primary uses jointly using one (1) or more parking facilities, as provided for in subsection (B) below shall be required to comply with the requirements in Subsection (2)(a-c) above.

2. *Joint parking.* By means of a Type I procedure, as governed by Section 20.210.040 VMC, owners of two (2) or more uses with legally established parking, may agree to utilize jointly the same parking and loading spaces on one (1) or more lots when the peak hours of operation of the uses do not overlap, subject to the following:

    a. Satisfactory legal evidence shall be presented to the Planning Official in the form of deeds, leases or contracts to establish the joint use and be recorded with the Clark County Auditor's Office against all properties involved;

    b. If a joint use arrangement is subsequently terminated, or if the uses change, the requirements of this title shall apply to each use separately.

3. *Disabled-accessible parking and access.* All parking areas and accessible routes of travel for disabled persons shall comply with the standards of the State of Washington and the City of Vancouver applicable building code.

D. General Design Standards for Surface Parking Areas, When Provided.

1. *Review Authority.* Parking lot design and drainage, when provided, shall be subject to review and approval of the City Transportation Manager.

2. *Maintenance of parking areas.* All parking lots shall be kept clean and in good repair at all times. Breaks in paved surfaces shall be repaired promptly. Broken or splintered wheel stops shall be replaced so that their function will not be impaired.

3. All signing and striping, including that for private parking lots, shall conform to the Manual of Uniform Traffic Control Devices (MUTCD). Individual spaces shall be marked with painted stripes.

4. *Location.* Parking spaces shall not be permitted in any setback except as otherwise specified in this title. For Building Types with six (6) or fewer units, vehicle, vessel, recreational vehicle trailer parking is permitted in the front build-to-line (primary street) and side setback (side street) provided it is: located on a legally established driveway; located out of sight triangles as per Section 20.450.060 VMC, Vision Clearance; does not extend into city right-of-way; and is currently licensed and registered. Parking of motor homes, trailers, recreational vehicles and boats is allowed on one side or rear setback on an impervious surface and served by a paved driveway.

5. No parking space shall be located where backing maneuvers from such a space would interfere with traffic flow to/from a public street to the parking area, generally within twenty (20') feet of a circulation aisle-way near a public street access point.

6. *Driveways.* Driveways which provide access to off-street parking or loading from public streets shall comply with the following:

a. Driveways from the street to off-street parking or loading areas shall be designed and constructed to facilitate the flow of traffic and provide maximum safety for pedestrians. At a minimum all driveways shall meet arterial access spacing standards; on arterial roadways shared driveways and cross-access easements may be required to improve arterial efficiency and safety consistent with access management practices detailed in NCHRP Report 420.

b. Where driveways are gated, even temporarily, the driveway approach shall be designed such that vehicles approaching or leaving the gated drive can queue to enter/exit the traffic stream without blocking the sidewalk or the street traffic, and shall not impede internal site circulation. Design of gated driveways shall be subject to review and approval by the City Transportation Manager.

c. Driveways shall be improved with a permanent surface including but not limited to asphalt, concrete, brick or masonry or other material approved by the Planning Official. Applicants are encouraged to use City and Department of Ecology alternative paving Best Management Practices to enhance on-site water quality where appropriate based on anticipated use.

d. Except for Building Types with six (6) or fewer dwelling units, groups of more than two (2) parking spaces shall be served by a driveway so that no backing movements or other maneuvering within a street or other public right-of-way is necessary.

e. *Loading/unloading driveways.* If an on-site drop-off is provided, the driveway shall be designed for continuous forward flow of passenger vehicles.

7. On-site vehicle stacking for drive-through use.

a. All uses providing drive-through services as defined by this chapter shall provide a stacking lane(s) on the same site for inbound vehicles as determined by a traffic study, subject to approval by the City Transportation Manager. Table 20.450.045-1 lists recommended stacking guidelines for design purposes.

TABLE 20.450.045-1 STACKING LANE GUIDELINES FOR USES WITH DRIVE-THROUGH WINDOWS

Use	Stacking Lane Guideline
Drive-in banks	Five (5) spaces per service terminal
Automated teller	Fifty (50') feet / service terminal machines
Drive-in cleaners, repair services	Fifty (50') feet
Drive-in restaurants	One hundred and eighty (180') feet
Mechanical car washes	Three (3) spaces per washing unit
Parking facilities	
Free-flow entry	One (1) space per entry driveway
Automated ticket dispense entry	Two (2) spaces per entry driveway
Manual ticket dispensing	One hundred (100') feet / entry driveway
Attendant parking	One hundred (100') feet
Vehicle fuel sales	Three (3) spaces per pump

[1] Minimum length of one (1) space = eighteen (18') feet

b. Stacking lanes must be designed so that they do not interfere with parking and vehicle, pedestrian and bicycle circulation. Stacking lanes for the purpose of selling food must provide at least one (1) clearly marked parking space per service window for the use of vehicles waiting for an order to be filled.

c. No portion of a stacking lane shall be located in a setback except at the points of connection between the site and public or private streets.

8. *Pedestrian access, circulation and connections.* The following standards apply to Residential Uses in Building Types with more than six (6) dwelling units, Office Uses, Primary Retail Uses, Passive Retail Uses, Industrial Uses, and Civic / Institutional uses in all zoning districts:

   a. The applicant shall extend pedestrian circulation routes to sidewalks and transit stops along streets abutting the site, to pedestrian facilities that extend to the edge of the site from off-site, and to the edge of the site in the direction of existing, approved or proposed off-site pedestrian and transit facilities.

   b. Pedestrian circulation routes shall also connect structures and uses on the site, such as buildings, vehicle and bicycle parking areas, children's play areas, required outdoor areas, open spaces, plazas, resting areas and viewpoints.

   c. To the extent practicable, the pedestrian circulation system shall be designed to minimize the distance a pedestrian needs to walk between typical origins and destinations of and off the site, including transit stops, public sidewalks and building entrances. Circuitous routes generally should be avoided except for an appropriate purpose given the use or setting.

   d. Where pedestrian or bicycle routes cross access, maneuvering, parking or loading areas, the crossing must be clearly identified by using elevation changes, speed bumps, a different paving material, and other method that effectively alerts drivers, pedestrians and cyclists of the location and nature of the crossing. Striping is strongly discouraged as the only method of identification of pedestrian crossings. When striping is used, it must be continuously maintained in perpetuity in an effective manner by the property owner.

   e. Where a pedestrian or bicycle route is parallel and adjacent to an auto travel lane or parking area, the pedestrian or bicycle route must be safely separated from the auto travel lane by using a raised path, a raised curb, bollards, landscaping or other physical barrier.

   f. *Lighting.* The on-site pedestrian circulation system must be lighted to a level of one-half (0.5 FC) foot candle, except for accessible parking and associated areas which must be lighted to one (1.0) foot candle. Such lighting shall be directed in a manner to prevent glare on nearby residential areas.

   g. *Pedestrian route dimensions.* In all commercial zones, the primary pedestrian connection between the main entrance and the fronting arterial shall be a minimum of eight (8') feet unobstructed width. All other pedestrian connections shall be a minimum of five (5') unobstructed width. The Planning Official may modify these standards for minor expansions of existing uses that face site-specific challenges.

h. Required pedestrian circulation routes shall be improved with an asphalt, concrete or other approved all-weather surface; provided, pedestrian circulation routes through recreational or open space areas may be improved with a material consistent with their purpose and the characteristics of their location.

i. *Connections.* The pedestrian system must be connected to site and adjacent streets and nearby transit stops. The pedestrian system must also connect public open space or parks, commercial, office and institutional developments when existing development does not preclude such connection. Development patterns must not preclude eventual site-to-site connections, even if an adjacent site is not planned for development at the time of the applicant's development. Connections between buildings and the street shall be no greater than two-hundred (200') feet apart.

9. *Parking lot landscaping.* See Section 20.450.035 VMC, Landscaping and Tree Conservation.

10. Parking lot surfacing.

a. All areas used for the parking or storage or maneuvering of any vehicle shall be improved with asphalt, concrete or other permanent surface approved by the Planning Official; The Planning Official may approve the use of City and Department of Ecology alternative paving Best Management Practices to enhance on-site water quality where determined to be appropriate based on type and frequency of anticipated use.

b. Parking areas to be used primarily for temporary staging of construction equipment and temporary parking for the facility during construction may be surfaced in gravel when authorized by the approval authority at the time the site development approval is given. The Planning Official may require the property owner to remove the gravel immediately following construction or enter into an agreement to pave the parking area: (1) within a specified period of time after its establishment; or (2) if there is a change in the types or weights of vehicles utilizing the parking area; or (3) if there is evidence of adverse effects upon adjacent roadways, water courses or properties. Such an agreement shall be executed as a condition of approval of the plan to establish the gravel parking area

11. Parking lot and access striping.

a. Except for Building Types with six (6) or fewer dwelling units, any area intended to be used to meet the off-street vehicle parking requirements as contained in this chapter shall have all parking spaces clearly marked; and

b. All interior drives and access aisles shall be clearly marked and signed to show direction of flow and maintain vehicular and pedestrian safety.

12. *Wheel stops.* Parking spaces along the boundaries of a parking lot or adjacent to interior landscaped areas or sidewalks shall be provided with a wheel stop or bumper rail at least six (6") inches high located two (2') feet back from the front of the parking stall. The front two (2') feet of the parking stall may be concrete, asphalt or low- lying landscape material that does not exceed the height of the wheel stop, provided sidewalks or other pedestrian paths are not obstructed.
13. *Drainage.* Off-street parking and loading areas shall be sloped to drain in accordance with specifications approved by the Director of Public Works. These areas shall be drained to prevent the flow of water onto the right-of-way, across pedestrian facilities, or onto adjacent properties unless specifically authorized by the Director of Public Works.
14. *Lighting.* All off-street parking areas larger than five thousand, five hundred and fifty (5,550 sq. ft.) square feet shall be illuminated. Public parks that close at dusk are exempted from this provision. All parking lot lighting shall comply with requirements in Section 20.450.070 VMC, Dark Sky Outdoor Lighting Requirements and be directed away from any adjacent lots that contain Residential Uses.
15. Space and aisle dimensions.

TABLE 20.450.045-2 SPACE AND AISLE DIMENSIONS

	Standard Stall Dimension		Compact Stall Dimension		Aisle Width Dimension	
Angle (degrees)	Stall Width (feet)	Stall Depth (feet)	Stall Width (feet)	Stall Depth (feet)	1-Way Aisle Width	2-Way Aisle Width
0	20	8	8	18	12	20
45	9	17	8	15	14	20
60	9	17	8	15	16	22
90	9	17	8	15	22	22

a. Designated disabled parking stalls which meet minimum dimensional requirements shall be counted as standard size parking stalls and shall be provided as required by applicable State of Washington and Title 17 VMC, Building Code, as amended for disabled person parking spaces.

b. The width of each parking space includes a stripe that separates each space.

c. Up to fifty (50%) percent of all required on-site vehicular parking spaces may be compact spaces. Such spaces shall be marked as “compact” or “C”.

d. *Clustering.* No more than an average of ten (10) parking spaces shall be placed side by side without an intervening break provided by a circulation aisleway, pedestrian walkway, or landscaping. If an average of no more than ten (10) side-by-side stalls is maintained overall, up to fifteen (15) stalls may be located side-by-side. Where landscaping provides a break in the group of spaces, the landscape island shall extend at least one (1') foot into the circulation aisleway to provide a visual narrowing of the circulation aisleway.

e. A portion of a parking space may be landscaped instead of paved as follows:

(A). The landscaped area may be up to two (2') of the front of the space as measured from a line parallel to the direction of the bumper of a vehicle using the space.

(B). Landscaping must be groundcover plants; and

(C). The landscaped area counts towards parking lot interior landscaping requirements, but not perimeter landscaping requirements, and shall not obstruct the minimum width requirements for pedestrian circulation.

f. Other parking angles, such as but not limited to thirty (30) degrees or seventy-five (75) degrees may be approved by the Planning Official, with dimensional requirements consistent with those illustrated in Table 20.450.045-2.

g. Minimum standards for a standard parking stall’s length and width, aisle width, and maneuvering space in a parking structure shall be determined as noted in Table 20.450.045-2.

E. Parking Structure Design Standards.

See subection 20.430.050(G)(9) VMC Structured Parking Facilities for Primary Use standards.

F. Off-Street Parking Requirements.

1. Parking requirements for unlisted uses.

a. The Planning Official may rule that a use not specifically listed in Table 20.450.045-3 below is a use similar to a listed use and that the same parking standards shall apply. If the applicant requests that the Planning Official’s decision be rendered in writing, it shall constitute an interpretation, as governed by Chapter 20.255 VMC; and

b. The Planning Official shall maintain a list of approved unlisted use parking requirements that have the same effect as an amendment to this chapter.

2. *Choice of parking requirements.* When a building or use is planned or constructed in such a manner that a choice of parking requirements could be made, the Planning Official shall determine which requirement is most appropriate.
3. *Measurements.* The following measurements shall be used in calculating the required number of vehicle parking spaces required in this chapter:
    a. *Fractions.* Fractional space requirements of up to one-half (0.5) shall be rounded down to the next whole number and one-half (0.5) or greater rounded up to the next whole number.
    b. *Employees.* Where employees are specified for the purpose of determining the required vehicle parking spaces required, the employees counted are those who work on the premises during the largest shift at the peak season.
    c. *Students.* When students are specified for the purpose of determining the required vehicle parking spaces required, the students counted are those who are on the campus during the peak period of the day during a typical school term.
    d. *Space.* Unless otherwise noted, where gross square feet (gsf) are specified, the area measured shall be gross floor area under the roof measured from the faces of the structure, excluding only space devoted to covered off-street parking or loading.
4. *Exclusions to vehicle parking requirements.* The following shall not be counted towards the computation of the parking spaces as required in Table 20.450.045-3 below:
    a. *On-street parking.* Parking spaces in the public street or alley shall not be eligible as fulfilling any part of the parking requirement except as provided elsewhere in this Title;
    b. *Fleet parking.* Required vehicle parking spaces may not be used for storage of fleet vehicles, except when a use can show that employee and fleet parking spaces are used interchangeably (e.g., the employee drives the fleet vehicle from home, or the spaces are used for fleet storage only at night and are available for employee use during the day). For the purposes of this title, space exclusively devoted to the storage of fleet vehicles will be considered as outdoor storage.
5. *Specific requirements for minimum parking.* Parking shall be provided for uses as per Table 20.450.045-3, below:

TABLE 20.450.045-3. MINIMUM OFF-STREET VEHICLE PARKING REQUIREMENTS

Primary Use Type	Minimum
ACTIVE RETAIL	
Any Primary Retail uses.	None Required.
CIVIC / INSTITUTIONAL	
Any other Civic / Institutional Uses.	None Required.
Community Centers, Cultural Centers, Colleges, Community Recreation, Detention and Post-Detention Facilities, Emergency Services (except ambulance), Medical Centers, and Schools Public or Private.	Per approved parking study or Transportation Demand Management Plan (TDMP).
INDUSTRIAL USES	
Any other Industrial Uses.	None Required.
INFRASTRUCTURE USES	
Any other Infrastructure Uses.	None Required.
Airports / Airparks and Transportation Facilities	Per approved parking study or Transportation Demand Management Plan (TDMP).
OFFICE USES	
Any Office Uses.	None Required.

Primary Use Type	Minimum
OPEN SPACE USES	
Any other Open Space Uses	None Required.
Parks or Natural Area (urban), Parks or Natural Area (regional), and Trails.	Parks Department to Determine the Minimum Number of Required Spaces.
PASSIVE RETAIL USES	
Any other Passive Retail uses.	None Required.
Major Event Entertainment	Per approved parking study or Transportation Demand Management Plan (TDMP).
RESIDENTIAL USES	
Any Residential Uses.	None Required.

G. Off-Street Loading Requirements.

1. *Berths required.* Except in the Mixed-use Neighborhood (MX) and Regional Activity Center (RA) districts, new or substantially renovated buildings or structures that require receipt, delivery or distribution of materials and merchandise by trucks, shall provide and maintain off-street loading berths according to prescribed standards. The Planning Official may through a Type 1 procedure waive off-street loading requirements for uses that demonstrate a loading berth is not needed. The applicant shall demonstrate that either the proposed use does not require receipt, delivery or distribution of materials and merchandise by truck, that only small delivery trucks will access the site, or that large trucks will only access the site outside of normal business hours.

2. Off-street loading spaces.

   a. With the exception of the uses listed in Subsection (2) below, commercial and industrial off-street loading requirements shall provide a minimum number of berths as indicated on Table 20.450.045-4.

TABLE 20.450.045-4 MINIMUM LOADING BERTHS

Number of Berths	Gross Floor Area
One (1)	Five thousand (5,000 SF) up to twenty-five thousand (25,000 SF) square feet.
Two (2)	Twenty-five thousand (25,000 SF) up to fifty thousand (50,000 SF) square feet.
Three (3)	Fifty thousand (50,000 SF) up to one hundred thousand (100,000 SF) square feet.
One (1) additional for each	Fifty thousand (50,000 SF) in excess of one hundred (100,000 SF) square feet.

b. All Office uses; hotels; restaurants; auditoriums and medical centers, colleges, residential care centers or other institutions that contain a structure or structures with a total area of thirty thousand (30,000 GSF) gross square feet or greater shall provide the minimum number of off-street loading spaces as indicated in Table 20.450.045-5.

TABLE 20.450.045-5 MINIMUM LOADING BERTHS FOR SELECTED USES

Number of Berths	Gross Floor Area
One (1)	Thirty thousand (30,000 SF) up to fifty thousand (50,000 SF) square feet.
Two (2)	Fifty thousand (50,000 SF) up to 100,000 square feet.
One (1) additional for each	Fifty thousand (50,000 SF) in excess of one hundred thousand (100,000 SF) square feet.

3. *Size of berths.* Berths required by preceding sections shall be a minimum of ten (10') feet wide, forty-five (45') feet long and fourteen (14') feet high.
4. *On-site location.* Required loading berths shall be located on the site of the primary use to which they are an accessory. When there is a campus development, e.g., medical center, college, business park, required loading berths may be aggregated on the site.
5. *Design standards.* Berths shall be provided in such a manner to avoid undue congestion and interference with public use of adjacent streets, sidewalks and alleys.

a. Access to such berths shall be from an alley when such exists unless the alley abuts the Low-Scale Neighborhood (LS) district.

b. Off-street truck loading areas shall be separated from the off-street parking area.

c. The surface shall be paved with asphalt or concrete.

6. *Relationship to residential uses.* No berth shall be located closer than 50' to any other lot in any residential district unless located entirely within a completely enclosed building.

H. Bicycle and Small Mobility Parking Standards.

1. *Purpose*. The purpose of these standards is to promote bicycling and small mobility as modes of transportation, which enables healthy lifestyles, is affordable, and reduces greenhouse gas emissions, as an active mode of transportation. The standards set the necessary required bicycle and small mobility parking facilities for a bicycle and small mobility friendly community. Sufficient bicycle and small mobility parking (herein referred to as "bicycle parking" for simplicity) is necessary to encourage more bicycle and small mobility travel throughout the city by providing a safe, secure, and convenient place to park one's bicycle or small mobility device.

2. *Standards for all bicycle parking.* Any bicycle parking implemented under this section shall meet the following standards:

a. *Number of Bicycle Parking Spaces*. Bicycle parking spaces shall be provided for uses as per Table 20.450.045-6. Bicycle parking spaces that count toward minimum long-term requirements may not be counted toward minimum short-term spaces, or vice versa. Wherever this table indicates two numerical standards, such as "2, or 1 per 3,000 sq. ft. of floor area," the greater number applies.

TABLE 20.450.045-6 MINIMUM QUANTITY REQUIREMENTS FOR SHORT- AND LONG-TERM BICYCLE PARKING.

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
Active Retail Uses		
Artisan and specialty goods production	1, or 1 per 12,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of customer service/sales-oriented floor area
Eating and drinking establishments	1, or 1 space per 12,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of floor area

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
Personal services	1, or 1 per 12,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of floor area
Sales-oriented	1, 0r 1 per 12,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of floor area
Civic / Institutional Uses		
Ambulance services	None	None
Community centers	1, or 1 per 4,000 sq. ft. of floor area	2, or 1 per 2,000 sq. ft. of floor area
Cultural centers	1, or 1 per 4,000 sq. ft. of floor area	2, or 1 per 2,000 sq. ft. of floor area
Colleges	1, or 1 space per 25,000 sq. ft. of floor area	2, or 1 space per 10,000 sq. ft. of floor area
Community recreation	1, or 1 per 4,000 sq. ft. of floor area	2, or 1 per 2,000 sq. ft. of floor area
Day care (child care centers and institutional adult day care)	1, or 1 space per 5 employees	Family day care home: None Institutional: 2 spaces
Detention and post-detention facilities	1, or 1 per 20,000 sq. ft. floor area	2 spaces
Emergency services (except ambulance	1, or 1 per 12,000 sq. ft. of floor area	2 spaces
Medical centers	1, or 1 per 12,000 sq. ft. of floor area	2, or 1 per 40,000 sq. ft of floor area
Religious institutions	1, or 1 space per 15,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of floor area

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
Schools (public and private)	1, or 1 space per 5 employees	Elementary and middle school: 2, or 1 space per 50 students High school: 2, or 1 space per 40 students
Social / fraternal and clubs / lodges	1, or 1 per 12,000 sq. ft	2, or 1 per 4,000 sq. ft
Industrial uses		
Bulk fossil fuel storage and handling facility	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Cleaner fuels storage and handling facility	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Energy plants	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Industrial services	1, or 1 per 20,000 sq. ft. floor area	2 spaces
Manufacturing and production	1, or 1 per 20,000 sq. ft. floor area	2 spaces
Organic materials management facilities	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Recycling facilities	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Research and development	1, or 1 per 20,000 sq. ft. floor area	2 spaces
Small fossil fuel or cleaner fuel storage and distribution facilities	1, or 1 per 40,000 sq. ft. floor area	2 spaces

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
Solid waste handling facilities	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Truck stops	None	None
Warehouse / freight movement	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Wholesale sales	1, or 1 per 30,000 sq. ft. floor area	2 spaces
Infrastructure uses		
Airports / airparks	None	None
Basic utilities	None	None
Data centers	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Heliports	None	None
Major utility facilities	1, or 1 per 40,000 sq. ft. floor area	2 spaces
Park and ride facilities	2, or 1 per 40 vehicle spaces. If the park and ride lot provides parking for a rail transit station, bus transit center or passenger terminal: (a) Required long-term bicycle parking may be provided at the rail transit station, bus transit center or passenger terminal in	2, or 1 per 40 vehicle spaces

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
	lieu of at the parking location in order to improve convenient access to transit. (b) No additional long-term bicycle parking is needed if the rail transit station, bus transit center or passenger terminal already meets or exceeds the bicycle parking requirements above.	
Rail lines / utility corridors	None	None
Railroad yards	None	None
Structured parking facilities (i.e., parking garages)	1, or 1 per 40 vehicle spaces.	2, or 1 per 40 vehicle spaces.
Surface parking facilities (i.e., parking lots)	1, or 1 per 40 vehicle spaces.	2, or 1 per 40 vehicle spaces.
Transportation facilities	5% of projected a.m. peak period daily ridership	1.5% of projected a.m. peak period daily ridership
Water-related or water-enjoyment (as defined by VMC 20,760 Shoreline Management)	Marina: 1 per 40 boat slips Other: None	2 spaces
Wireless communication facilities	None	None
Office Uses		
Extended office	1, or 1 space per 4,000 sq. ft. of floor area	2, or 1 per 40,000 sq. ft. of floor area

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
General office	1, or 1 space per 4,000 sq. ft. of floor area	2, or 1 per 40,000 sq. ft. of floor area
Medical office	1, or 1 per 12,000 sq. ft. of floor area	2, or 1 per 40,000 sq. ft of floor area
Open Space Uses		
Agriculture / horticulture / silviculture	A number of spaces equal to 10% of total employees who work on-site	2 spaces
Cemeteries	None	2, or 1 per 10 acres, whichever is greater
Environmental management and education	A number of spaces equal to 10% of total employees who work on-site	2, or 1 per 40,000 sq. ft. of maintained area
Fish hatcheries	A number of spaces equal to 10% of total employees who work on-site	None
Motorized recreational activities	None	None
Parks or natural area (urban)	None	2, or 1 per 5 acres, whichever is greater
Parks or natural area (regional)	A number of spaces equal to 10% of total employees who work on-site	2, or 1 per 40,000 sq. ft. of maintained area, plus 2 per outdoor recreation facility provided at the park
Trails	None	2, or 1 per 10 acres, whichever is greater

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
Passive Retail Uses		
Animal kennel / shelters	1, or 1 per 12,000 sq. ft. of floor area	2 spaces
Adult entertainment	Refer to specific use, i.e., theater, book or video store	Refer to specific use, i.e., theater, book or video store
Auto salvage / repair	1, or 1 per 20,000 sq. ft. of floor area	2 spaces
Bulk sales	1, or 1 per 20,000 sq. ft. of floor area	2 spaces
Commercial and transient lodging (e.g., hotels)	1, or 1 space per 20 rooms	2 spaces
Dog day care	1, or 1 per 12,000 sq. ft. of floor area	2 spaces
Electric vehicle (EV) battery exchange station	None	None
Electric vehicle (EV) charging station (stand-alone)	None	None
Indoor entertainment	1, or 1 per 12,000 sq. ft	2, or 1 per 4,000 sq. ft
Major event entertainment	1, or 1 per 12,000 sq. ft	10, or 1 per 40 seats, whichever is greater
Motor vehicle sales / rental	1, or 1 per 20,000 sq. ft. of floor area	2 spaces
Motor vehicle servicing / repair	1, or 1 per 20,000 sq. ft. of floor area	2 spaces

Use	Minimum Long-term Spaces	Minimum Short-term Spaces
Outdoor sales	1, or 1 per 20,000 sq. ft.	2 spaces
Repair-oriented	1, or 1 per 12,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of customer service/sales-oriented floor area
Self-service storage	None	2, or 1 per 20,000 sq. ft. of floor area
Vehicle fuel sales (i.e., gas stations)	1, or 1 per 12,000 sq. ft. of floor area	2, or 1 space per 4,000 sq. ft. of customer service/sales-oriented floor area
Residential Uses		
Group living	0.25 per bedroom	1 per 20 bedrooms
Household living	More than 6 units on a parent parcel: 0.75 per unit for the first 100 units, then 0.5 per unit for any additional units over 1006 or fewer units on a parent parcel: None	More than 6 units on a parent parcel: 2 or 1 per 20 units 6 or fewer units on a parent parcel: None

i. *Parking requirements for unlisted uses*. The Planning Official may rule that a use not specifically listed in Table 20.450.008.080 is a use similar to a listed use and that the same parking standards shall apply. If the applicant requests that the Planning Official's decision be rendered in writing, it shall constitute an interpretation, as governed by Chapter 20.255 VMC. The Planning Official shall maintain a list of approved unlisted use parking requirements that have the same effect as an amendment to this chapter.

ii. *Choice of parking requirements*. When a building or use is planned or constructed in such a manner that a choice of bicycle parking requirements could be made, the use that requires the greater number of bicycle parking spaces shall govern.

iii. *Measurements.* The following measurements shall be used in calculating the total minimum number of bicycle parking spaces required in this chapter:

(A). *Fractions.* Fractional space requirements of up to half (0.5) shall be rounded down to the next whole number and half (0.5) or greater rounded up to the next whole number.

(B). *Employees.* Where employees are specified for the purpose of determining the minimum vehicle parking spaces required, the employees counted are those who work on the premises during the largest shift at the peak season.

(C). *Students.* When students are specified for the purpose of determining the minimum bicycle parking spaces required, the students counted are those who are on the campus during the peak period of the day during a typical school term.

(D). *Space.* Unless otherwise noted, where gross square feet (GSF) are specified, the area measured shall be gross floor area under the roof measured from the faces of the structure, excluding only space devoted to covered off-street parking or loading.

iv. Reductions in minimum required bicycle parking.

(A). The Planning Official may reduce the minimum bicycle parking spaces required in Table 20.450.045-6 by up to fifty percent (50%) if the required conditions below are met. Reductions in parking minimums shall be cumulative and inclusive of reductions allowed under any provision of this title.

(1). Any residential developments where the owner certifies and provides evidence that at least 50 percent of dwelling units are rented or sold at levels affordable to households earning 100 percent area median income or lower in accordance with the U.S. Department of Housing and Urban Development for a minimum of 10 consecutive years from final occupancy.

v. *Parking for properties with multiple uses.* In the event several uses occupy a single structure or parcel of land, the total requirements for bicycle parking shall be the sum of the required parking for the individual primary uses. Bicycle parking for multiple uses may be clustered in one or several locations and shall meet all other requirements for bicycle parking.

b. Access.

i. Short-term bicycle parking spaces must be publicly accessible.

ii. Long-term bicycle parking spaces must be in a secure location where access to bicycle parking space(s) is limited and not available to the general public.

iii. Bicycle parking spaces shall be accessible via an access pathway that:

(A). Is a minimum of thirty-two (32”) inches wide,

(B). Connects to the right-of-way, and

(C). Does not have stairs, curbs, or other barriers where lifting a bike or small mobility device is necessary.

(1). Access pathways may include elevators

iv. Bicycle parking spaces shall not block access to entrances/exits.

v. Outdoor bicycle parking spaces and access pathways shall be surfaced with asphalt, concrete, pavers, or other permanent surface approved by the Planning Official.

c. Location.

i. Short-term

(A). Required short-term bicycle parking spaces shall be located:

(1). Within seventy-five (75') feet of and visible from the main public entrance(s) of the building (or use if no building) or

(2). In an area shared with other properties or uses on the same block and street frontage and within two-hundred (200') feet of the entrance of each building or use, or

(3). A combination thereof.

(B). Short-term bicycle parking serving Open Space Uses may be distributed throughout the park to serve multiple access points and/or outdoor recreation facilities.

(C). When there are multiple public entrances and more than four (4) short-term spaces required, bicycle parking must be distributed to the different entrances.

(D). Short-term bicycle parking may be provided at locations not visible from the main public entrance(s) only if directional signage to the bicycle parking is provided at the main public entrance(s).

(E). Bicycle parking areas in garages or surface parking lots shall be protected from encroachment by vehicles with bollards, curbs, or other means.

(F). On-street public bicycle parking that meets the standards of this section may be used to meet minimum number of short-term bicycle parking spaces.

ii. Long-term

(A). Required long-term bicycle parking spaces for non-Residential Uses shall be located:

(1). On-site within 100 feet of an employee entrance, or

(2). In a shared bicycle parking facility within 300 feet of an employee entrance, or

(3). A combination of thereof,

(B). Required long-term bicycle parking spaces for non-Residential Uses shall be located:

(1). On-site and within 100 feet of a resident entrance of the building they serve, or

(2). In-unit (which may include in private garages, patios, and similar private spaces that are accessible only to that unit),

(3). A combination thereof.

(C). Required long-term bicycle parking for Residential Uses that is served by in-unit spaces:

(1). For buildings with fewer than twenty (20) dwelling units or where all units have private garages, up to one-hundred (100%) percent of required long-term bicycle parking may be provided in-unit.

(2). For buildings with twenty (20) or more dwelling units and where not all units have a private garage, up to seventy-five (75%) percent of required long-term bicycle parking may be provided in-unit.

(3). Dimensions:

i. Each horizontal space provided in-unit shall:

ii. Have minimum dimensions of six (6') feet long by two (2') feet wide

iii. Have at least five (5') feet of clearance behind each space to allow room for bicycle maneuvering.

iv. Each vertical / wall-mounted space shall:

v. Have minimum dimensions of three (3') feet deep by two (2') feet wide.

vi. Have a six-foot (6') height clearance.

vii. Have at least five (5') feet of clearance behind each space to allow room for bicycle maneuvering.

(4). Long-term bicycle parking spaces that are outdoors must be covered. The cover shall project out a minimum of two (2') feet beyond the bicycle parking spaces on the portion of the structure that is not enclosed by a wall.

(5). Acceptable shared facilities for long-term bicycle parking (for Residential Uses or non-Residential Uses) may include, but are not limited to, the following:

i. Designated indoor bicycle room with locking system;

ii. In an area entirely enclosed by a fence with a locked gate to create a "bicycle cage."

iii. The fence shall be at a minimum eight (8') feet high or be floor-to-ceiling height;

iv. Individual bicycle lockers with locking system;

v. Indoor designated bicycle space with racks in an employee or office area with locking system.

vi. Covered outdoor enclosures with a locking system, roof, and walls or fence.

vii. The cover must project out a minimum of 2 feet beyond the bicycle parking spaces on the portion of the structure that is not enclosed by a wall.

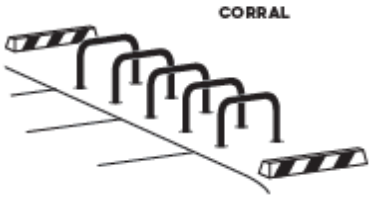
(6). For Residential Uses, in-unit, private garage, patio or deck bicycle parking that meets the location standards outlined in subsection H.2.c.ii.(C)

d. Rack Design and Placement.

i. Each bicycle parking space shall have facilities for locking or securing each bicycle in an upright position, except that no bicycle rack or locker is required for in-unit bicycle parking spaces.

ii. Rack types.

(A). The following rack types are acceptable for both short- and long-term bicycle parking.

Inverted U Rack (also called hoop or staple rack) (may be single or fastened in a series)	 
Floor-level bicycle Lockers	

Racks that meet all of the following: 1. Allow locking of bicycle frame and at least one (1) wheel with U-lock when both wheels are left on the bicycle and are not suspended. 2. Accommodate a variety of bicycles and attachments. 3. If the rack is a horizontal rack, it must support the bicycle at two points, including the frame. 4. Is securely anchored with tamper-resistant hardware.

(B). The following rack types are also acceptable for required long-term bicycle parking, but only for a maximum of fifty (50%) percent of the required long-term bicycle parking spaces that require racks/lockers. These are not acceptable for short-term bicycle parking.

Vertical racks	
Two-Tier or Double-Decker. May be stacked racks or lockers. All two-tier/double decker bicycle parking must have lift assist for upper spaces. Only the upper/non-floor level is subject to the maximum fifty (50%) percent limitation.	

(C). The following rack types are not acceptable for short- or long-term bicycle parking:

Wave (also called undulating or serpentine)	
Bollard	
Schoolyard (also called comb, grid)	
Spiral	

Coathanger	
Swing Arm Secured	
Wheelwell	

iii. Bicycle Racks.

(A). Bicycle spaces served by horizontal / floor-mounted racks shall:

(1). Have minimum dimensions of six (6') feet long by two (2') feet wide.

i. When more than twenty (20) long-term bicycle parking spaces are required, at least five (5%) percent of required long-term spaces must be large bicycle parking spaces – at least three (3') feet wide and ten (10') deep – that are served by a horizontal rack.

ii. Have at least five (5') feet of clearance behind each space to allow room for bicycle maneuvering.

iii. Be at least one (1') foot from a wall or other obstruction, not including the rack serving the space, along the sides/long edges of the bicycle parking space.

(B). Bicycle spaces served by vertical / wall-mounted racks shall:

(1). Have minimum dimensions of three (3') feet deep by two (2') feet wide.

(2). Have a six-foot (6') height clearance.

(3). Have at least five (5') feet of clearance behind each space to allow room for bicycle maneuvering.

(C). All bicycle racks shall:

(1). Not block pedestrian use of a walkway.

(2). Allow for the frame and at least one (1) wheel of a bicycle in a parking space to be secured with a standard U-lock.

(3). Have a minimum height of thirty-two (32”) inches or be indicated or cordoned off by visible markers so that they are visible to pedestrians.

(4). Be securely anchored with theft resistant hardware in concrete.

iv. *Lockers.* Bicycle lockers shall:

(A). Have a separate locking door for each bicycle space.

(1). Have at least five (5’) feet of horizontal clearance leading up to the entrance of the locker to allow room for bicycle maneuvering.

(2). Be securely anchored with theft resistant hardware.

(3). Be floor-level, or have lift assist for the elevated bicycle lockers when lockers are stacked.

v. Additional Requirements.

(A). Lighting. The bicycle parking spaces, excluding in-unit spaces, and access pathways shall be lighted to a minimum level of a half (0.5) foot candle. Such lighting shall be directed in a manner to prevent glare on nearby Residential Uses. Bicycle parking for public parks that close at dusk are exempted from this requirement.

(B). Electric outlets. When more than twenty (20) long-term bicycle parking spaces are required:

(1). Twenty (20%) percent of required long-term bicycle spaces located within a shared parking room or garage shall have an electric outlet within five (5’) feet of the space.

(2). All required spaces located in-unit shall have an electric outlet within five (5’) feet of the space.

(3). At least twenty (20%) percent of the required large bicycle spaces (as noted in Subsection B. 1 *Number of Bicycle Parking Spaces*) shall have an electrical outlet within five (5’) feet of the space.

(C). Maintenance. The property owner of a site shall have a continuing obligation to properly maintain any bicycle parking facilities on their property, including privately purchased and installed bicycle racks in the public right-of-way. The City of Vancouver will maintain publicly-provided bicycle parking facilities located in the public right-of-way.

20.450.050 Signs

A. Purpose. This chapter regulates signs which can be viewed from any public right-of-way by prescribing regulations and standards for such signs. It provides for administration, requires permits and prescribes fees therefore, and provides for enforcement and for appeals. This chapter is hereby found necessary as an exercise of the city's police and legislative powers to protect and promote the public health and safety; to promote the convenience and the enjoyment of public travel; to protect the public investment in city streets and public places; and to attract visitors to the city by conserving its natural and man-made beauty. This chapter is intended to balance the need for a well-maintained and attractive community and the need for adequate business identification, advertising and communication.

B. Scope.

1. This chapter shall apply to all property and land within the jurisdiction of the city. It is unlawful for any person, firm, or corporation that owns, occupies, or controls property in the city to construct, maintain, display or alter or cause to be constructed, maintained, displayed or altered, a sign within the city except in conformance with this chapter.

2. It is not intended for this chapter to regulate public sector signing, political campaign signs, private noncommercial signs less than six (6 SF) square feet per face, doorway identification nameplates up to four (4 SF) square feet, and holiday decorations, as such terms are used and/or defined herein.

3. In addition to subsection B above, the following on-site nonilluminated signs are permitted without a sign permit and in addition to the maximum allowable number and maximum allowable area of signs, as follows:

   a. One (1) maximum six (6 SF) square feet per face sign, per frontage in all zoning districts; or

   b. One (1) maximum forty-eight (48 SF) square feet per face sign, per frontage, on a lot in any nonresidential district.

   c. Three (3) maximum forty-eight (48 SF) square feet per face sign(s), per frontage on active construction sites in all districts. Active construction sites include properties where development permits are pending or have been issued but a final occupancy permit has not been issued.

   d. Exception: This section shall not allow any sign otherwise prohibited by this title.

4. Vehicles Signs (including trailers). Vehicles used as part of the normal function of a business or organization are permitted to have signs relating to that business or organization, subject to the following limitations:

a. *Not Permitted.* Any sign attached to or placed on a parked vehicle or trailer used principally for advertising purposes, rather than transportation. A vehicle or trailer shall be considered principally used for advertising purposes based on the following criteria: a) a sign is attached or placed on the vehicle or trailer that is larger than twenty (20 SF) square feet in area; b) the sign is attached or placed on the vehicle or trailer for more than twelve (12) hours in any forty-eight (48) hour period; c) the vehicle or trailer is parked in the same location or within three hundred (300') feet of one (1) location for more than four (4) hours; and d) the sign attached or placed on the vehicle or trailer is parked in a public right-of-way or within fifty (50') feet of a public right-of-way; and e) the sign attached to the vehicle or trailer can be read by a person with normal vision from inside the arterial right-of-way.

b. The provisions of the above section shall not apply where: a) the vehicle is temporarily parked at a loading dock, b) the vehicle is substantially hidden from view from any public street by buildings, fences, mature landscaping or similar objects such that the vehicle does not attract attention to or communicate information about the business or organization, c) the vehicle is legally parked at the residence of the driver, d) the vehicle is a contractor's trailer at the site of an active construction project or e) the vehicle is available for rent as part of an equipment rental business and the content of the sign refers to the rental business only; or when such vehicle is parked at or near the site of the business or organization.

5. *Window Signs.* Window signs in conjunction with a permitted use are exempt, provided fifty (50%) percent or more of the window area is unobscured by signage. Such signs shall not be included in determining the number of signs nor permissible sign area. Sign permits are not required.

6. Dark Sky Compliance. Newly constructed buildings with outdoor illuminated signage that requires land use review shall adhere to Section 20.450.070 VMC, Dark Sky Outdoor Lighting Requirements.

C. Prohibited Signs.

The following types of signs are prohibited, except as otherwise provided by this chapter and in Section 20.450.050(I) Portable Signs in the Public Right-of-Way:

a. *Off-premises signs.* Off-premises signs are prohibited except as authorized in this chapter. For exception see subsection20.450.050(I) Portable Signs in the Public Right-of-Way.

b. *Flashing signs.* Except where permitted by section regulation for a special district or time/temperature or similar public service information signs. For the purpose of this title, EMC's consistent with the standards of 20.450.050(D)(5) shall not be considered flashing signs.

c. *Free-standing signs.* Individual free-standing signs are prohibited in any business complex where a business complex sign exists.

d. *Billboards.* Billboards are prohibited in all zoning districts.

e. *Signs that obstruct.* Any sign that substantially obstructs free and clear vision of exit, traffic intersection entrance, traffic sign or signal, or constitutes a traffic hazard by reasons thereof.

f. *Signs containing unwarranted content.* Any sign which contains statements, words, and pictures of an obscene character.

g. *Signs which do not conform in structure or material to uniform codes.* Any sign which does not structurally or materially conform to the requirements of the City Adopted Building Code as to structure or material except for signs permitted under Section 20.450.050(I) Portable Signs in the Public Right-of-Way.

h. *Projecting signs.* No projecting sign may extend into a two (2‘) foot setback from a curb line.

i. *Signs with angle iron cages.* Any sign whose main structural support is comprised of a visible angle iron cage.

j. *Signs in Public Areas.* No sign shall be placed or permitted to be placed on public property or public right-of-way except as permitted under Section 20.450.050(I) Portable Signs in the Public Right-of-Way, or signs on public buildings determined to be in the public interest by the Planning Official.

k. *Miscellaneous signs and posters.* The tacking, pasting, or otherwise affixing of any sign or signs of a miscellaneous character, visible from a public right-of-way, located on exterior walls of any building, barn, shed, tree, pole, post, fence or other structure is prohibited unless otherwise permitted.

l. *Lighting of signs.* Any sign which is found by the Planning Official to utilize an inordinate light source such as beacons, strobe lights, or reflectors or does not meet the requirements of Section 20.450.070 VMC, Dark Sky Outdoor Lighting Requirements.

m. *Signs emitting pollutants.* Any sign that emits audible sound, odor, or visible matter.

n. *Garage sale signs.* Any sign or signs advertising a garage sale to be held at a given premises which is posted for more than seven (7) calendar days in any one calendar year.

o. *Games of Chance Signs.* Commercial signs advertising card room gambling or other games of chance prohibited by state law or city ordinance.

p. *Banner Signs.* Banners used for advertising are prohibited unless otherwise specified in this code.

q. *Signs associated with single family uses.* Signs for uses allowed within single family homes are prohibited.

r. *Rotating Signs.* Rotating signs are prohibited in all zoning districts.

s. *Rooftop Signs.* Rooftop signs are prohibited in all zoning districts.

t. *Any other sign.* Any other sign that does not conform to all provisions of this code.

D. LS District Signs. In the LS district, permitted signs include signs for nonconforming uses with existing legal signs. Nonconforming signs advertising existing businesses may remain or be replaced in kind, as long as the business remains in operation, but may not be increased in size. In all Low Scale Districts, the regulations of this section shall apply:

1. *Free-standing signs*. Allowed in association with active retail and office uses only which meet the following criteria:

   a. Allowable Area: One (1) square foot per face per lineal foot of frontage up to a maximum of two hundred and fifty (250 SF) square feet per face. Provided that premises with less than thirty-two (32') lineal feet of frontage shall be allowed a maximum thirty-two (32 SF) square foot sign per face.

   b. Number of Signs: One (1) [There shall be no more than one (1) free-standing sign per frontage, and no more than one (1) fascia sign. If both are used, they must be on different frontages].

   c. Height of Sign: Maximum eight (8') feet to be measured from grade.

   d. Encroachment: No part of the freestanding sign shall project into any public right-of-way.

   e. No freestanding sign shall project or extend into any vision clearance area unless approved by the Planning Official.

   f. Any freestanding sign must be integrated. That is, all supports or sign elements shall be an integral part of the design. Auxiliary projections or attachments not a part of a single design are prohibited.

2. Fascia signs.

   a. Allowable Area: Maximum twelve (12%) percent of the portion of the building exterior enclosing the applicant's place of business, measured horizontally by width of occupancy and vertically by height of occupancy, along the building's elevation on which the sign is erected with a guaranteed minimum of thirty-two (32 SF) square feet. Total of all sign face areas shall not exceed two hundred and fifty (250 SF) square feet.

   b. Number of Signs: One (1) per business. [There shall be no more than one (1) free-standing sign per frontage, and no more than one (1) fascia sign. If both are used, they must be on different frontages].

   c. Height of Sign: Shall not extend above parapet or eave line.

3. *Projecting signs*. Projecting signs are prohibited.

4. *For sale/lease/rent signs*. As specified in Section 20.450.050(I).

a. Allowable Area: Maximum 6 square feet per face side and as specified in Section C.

b. Number of Signs: One (1) per frontage.

c. Encroachment: For sale/lease/rent signs may not encroach on the property line of the subject property.

5. *Electronic Message Center signs.* Allowed subject to the following standards:

a. Allowed in association with school or religious institution uses only which meet the following criteria:

i. The site has frontage on a major or minor arterial; or

ii. The site has frontage on a collector arterial and is at least two (2 AC) acres in size

b. Number of signs: One (1) per use

c. Type: Fascia or monument-style sign only

d. Maximum size: Sixteen (16 SF) square feet [fifty (50%) percent of allowed area of fascia or monument sign]; such sign shall not be in addition to allowable area of fascia or monument sign

e. Maximum height: Four (4') feet measured from grade if monument sign; fascia signs shall not extend above the parapet or eave line

f. Location: The EMC sign shall either face or be located adjacent to the arterial street

g. Hours of operation: The EMC sign shall be completely turned off between the hours of 9:00 pm and 7:00 am, seven days a week

h. Additional performance standards of VMC 20.450.050.D.5 and 20.450.050.E.7, shall apply to EMC signs in the LS and MS districts

i. Signs with an electronic message center which meet all of the above standards may also provide internal illumination to the remainder of the sign.

6. *Directional signs.* Allowed as per subsection 20.450.050(I).

7. *Business complex signs (free-standing signs only*). Free standing business complex signs are prohibited.

8. *Allowable combinations of sign types.* No combination of sign types is allowed.

9. *Lighting of signs.* Only indirect lighting is allowed, except as otherwise allowed by subsection 20.450.050(D)(5).

E. MS District Signs. In the MS District, the regulations of this Section shall apply:

1. *Off-premises signs.* Not allowed except as provided in 20.450.050(I).

2. *Free-standing signs*. Allowed in association with active retail and office uses only which meet the following criteria:
    a. Allowable Area: One (1) square foot per face per lineal foot of frontage up to a maximum of two hundred and fifty (250 SF) square feet per face. Provided that premises with less than thirty-two (32') lineal feet of frontage shall be allowed a maximum thirty-two (32 SF) square foot sign per face.
    b. Number of Signs: One (1) per frontage. [There shall be no more than one (1) free standing sign per frontage, and no more than one (1) fascia sign. If both are used, they must be on different frontages].
    c. Height of Sign: Maximum eight (8') feet to be measured from grade.
    d. Encroachment: No part of the freestanding sign shall project into any public right-of-way.
    e. No freestanding sign shall project or extend into any vision clearance area unless approved by the Planning Official.
    f. Any freestanding sign must be integrated. That is, all supports or sign elements shall be an integral part of the design. Auxiliary projections or attachments not a part of a single design are prohibited.
3. Fascia signs.
    a. Allowable Area: Maximum twelve (12%) percent of the portion of the building exterior enclosing the applicant's place of business, measured horizontally by width of occupancy and vertically by height of occupancy, along the building's elevation on which the sign is erected with a guaranteed minimum of thirty-two (32 SF) square feet. Total of all sign face areas shall not exceed two hundred and fifty (250 SF) square feet.
    b. Number of Signs: One (1) per business. [There shall be no more than one (1) free-standing sign per frontage, and no more than one (1) fascia sign. If both are used, they must be on different frontages].
    c. Height of Sign: Not to extend above parapet or eave line.
4. Projecting signs. Not allowed.
5. *Rooftop signs.* Not allowed.
6. *For sale/lease/rent signs*. As specified in subsection 20.450.050(I).
    a. Allowable Area: Maximum 6 square feet per face and as specified in subsection 20.450.009.050(B).
    b. Number of Signs: One (1) per frontage.

c. Encroachment: Not allowed.

7. *Electronic Message Center signs.* Allowed subject to the following standards:

   a. Allowed in association with school or religious institution uses only which meet the following criteria:

      i. The site has frontage on a major or minor arterial; or

      ii. The site has frontage on a collector arterial and is at least two (2 AC) acres in size

   b. Number of signs: One (1) per use

   c. Type: Fascia or monument-style sign only

   d. Maximum size: Sixteen (16 SF) square feet [fifty (50%) percent of allowed area of fascia or monument sign]; such sign shall not be in addition to allowable area of fascia or monument sign

   e. Maximum height: Four (4') feet measured from grade if monument sign; fascia signs shall not extend above the parapet or eave line

   f. Location: The EMC sign shall either face or be located adjacent to the arterial street

   g. Hours of operation: The EMC sign shall be completely turned off between the hours of 9:00 pm and 7:00 am, seven days a week

   h. Additional performance standards of VMC 20.450.050.D.5 and 20.450.050.E.7, shall apply to EMC signs in the LS and MS districts

   i. Signs with an electronic message center which meet all of the above standards may also provide internal illumination to the remainder of the sign.

8. Directional signs.

   a. Allowable Area. Maximum six (6 SF) square feet per face per sign.

   b. Number of Signs. One (1) per function per frontage.

9. *Business complex signs (free-standing signs only*). Free standing business complex signs are prohibited in Medium-Scale Neighborhood Districts.

10. *Lighting of signs.* Only indirect lighting is allowed and lighting shall comply with Section 20.450.070 VMC, Dark Sky Outdoor Lighting Requirements of this code, where lighting must be directed and shielded.

    a. No neon may be used as a light source.

    b. For internally illuminated signs, the background must be opaque and the illuminated portion of the sign face must not exceed forty (40%) percent of the sign face area.

c. For Business Complex Signs, only that portion of the sign identifying the complex may be illuminated.

F. MX and RA District Signs. In the MX and RA districts as defined in this Title, the following regulations and standards shall apply:

1. Free-standing signs.

a. Allowable Area: One (1) square foot per face per lineal foot of frontage up to a maximum of two hundred and fifty (250 SF) square feet per face. Provided that premises with less than thirty-two (32') lineal feet of frontage shall be allowed a maximum thirty-two (32 SF) square foot sign per face.

b. Number of Signs: One (1) per frontage.

c. Height of Sign: Maximum twenty-five (25') feet to be measured from grade to top of sign.

d. Encroachment Above Public Right-of-Way: No part of the freestanding sign shall project into any public right-of-way.

e. No freestanding sign shall project or extend into any vision clearance area unless approved by the Planning Official.

f. Any freestanding sign must be integrated. That is, all supports or sign elements shall be an integral part of the design. Auxiliary projections or attachments not a part of a single design are prohibited.

2. Fascia signs.

a. Allowable Area: Maximum twelve (12%) percent of the portion of the building exterior enclosing the applicant's place of business, measured horizontally by width of occupancy and vertically by height of occupancy, along the building's elevation on which the sign is erected with a guaranteed minimum of thirty-two (32 SF) square feet. Total of all sign face areas shall not exceed two hundred and fifty (250 SF) square feet.

b. Number of Signs: No maximum number provided the total area of all signs complies with D1 above.

c. Height of Sign: No sign shall extend above parapet or eave line.

d. Fascia Signs: Fascia Signs may not encroach into right-of-way if less than eight (8') feet above grade.

3. Projecting signs.

a. Allowable Area: Maximum fifteen (15%) percent of a building elevation on which the sign is erected. Total of all sign face areas shall not exceed two hundred and fifty (250 SF) square feet.

b. Number of Signs: One (1) per elevation per business.

c. Height of Sign: No sign shall extend above parapet or eave line.

d. Encroachment Above Public Right-of-Way. No encroachment allowed for signs less than eight (8') feet above grade; three (3') feet encroachment allowed for signs greater than eight (8') feet but less than or equal to ten (10') feet above grade; four (4') feet encroachment allowed for signs greater than ten (10') feet and less than or equal to twelve (12') feet above grade, and six (6') feet for signs more than twelve (12') feet above grade.

4. *Temporary signs.* Not allowed, except for portable signs in the right-of-way under subsection 20.450.050(I).

5. Electronic Message Center signs.

a. The area of the electronic message center shall not exceed twenty (20%) percent of the area of the sign; provided the area limitation shall not apply if the sign is solely limited to time and temperature.

b. All messages displayed on an electronic message center shall be directly related to the business for which the sign was constructed. No off-premises signage is permitted.

c. All electronic message centers signs shall be constructed as an integral part of a permanent sign constructed on-site. Integral shall be considered to be incorporated into the framework and architectural design of the permanent sign.

d. The display shall be limited to text and static images only and shall not appear to flash, portray blinking or chasing lights, or otherwise create continuously changing images. However, scrolling of text (horizontal or vertical) is permitted. The rate of change for sign copy from one (1) message to another shall be no more frequent than every eight (8) seconds and the actual copy change shall be accomplished in four (4) seconds or less. Once changed, the copy shall remain static until the next change.

e. All electronic message center signs shall have installed ambient light monitors and shall at all times allow such monitors to automatically adjust the brightness level of the electronic message center sign based on ambient light conditions.

f. Electronic message center signs shall not be associated with any dwelling or home occupation with a residential use.

g. Electronic message center sign permit applications must include a copy of the manufacturer's operating manual, which includes the manufacturer's recommended standards for brightness, scrolling or traveling speed, and other display operations.

h. Electronic message center signs which create a source of glare shall be adjusted or removed as directed by the Planning Official. No electronic message center sign may be illuminated to a degree of brightness that is greater than necessary for adequate visibility. In no case may the brightness exceed eight thousand nits (8,000) or equivalent candelas during daylight hours, or one thousand (1,000) nits or equivalent candelas between dusk and dawn.

i. Electronic message center sign permit applications must also include a certification from the owner or operator of the sign stating that the sign shall at all times be operated in accordance with City codes and that the owner or operator shall provide proof of such conformance upon request of the City.

6. Directional signs.

   a. Allowable Areas: Maximum six (6 SF) square feet per face per sign.

   b. Number of Signs: One (1) per function per frontage

7. Business complex signs (free-standing signs).

   a. Allowable Area: One and a half (1.5 SF) square feet per face per lineal foot of frontage up to a maximum of two hundred and fifty (250 SF) square feet per face. Provided that a premises with less than thirty-two (32') lineal feet of frontage shall be allowed a maximum thirty-two (32') square foot sign per face.

   b. Height of Sign: Maximum two (25') feet from grade to top of sign.

   c. Number of Signs: One (1) per frontage. A secondary sign is allowable if any single frontage exceeds three hundred (300') feet. Total square footage of all signage must fall within above formula.

8. Allowable combinations of sign types.

   a. Signs attached to a given building elevation will not exceed a total of fifteen (15%) percent of that elevation.

   b. On any street frontage, these combinations are allowable:

      i. Fascia and Free-Standing Signs.

      ii. Fascia and Projecting Signs

      iii. No other combinations allowed.

   c. Business Complex Signs are required for any business in a business complex desiring a Free-Standing Sign. The use of a Business Complex Sign shall replace all other Free-Standing Signs on the premises, except temporary or directional signs.

9. *Weather protection.* Where a building frontage is provided with weather protection, said building shall be entitled to the following additional signage; and said additional signage shall not be included in the figuring of the total sign area on the building.

    a. A projecting sign suspended from the weather protection structure not exceeding six (6 SF) square feet in area per face. Each business shall be allowed one (1) such sign per public entry. The bottom of any sign of this type shall be at least eight (8') feet above the sidewalk.

    b. A fascia sign attached to the building but below the weather protection device. Each business shall be allowed one (1) such sign per public entry.

G. IC, IE, and HI District Signs. In the IC, IE, and HI districts, the regulations and standards of this Section shall apply:

1. Off-premises signs in Industrial Parks.

    a. Type of Sign: Monument sign.

    b. Allowable Areas: Maximum thirty (32 SF) square feet per face per sign. Maximum of sixty-four (64 SF) square feet total all sign faces.

    c. Number of Signs: One (1) per business and copy must be related to the resident manufacturers or industries, and for directional purposes only (not allowed in the Industrial Districts along Lincoln Avenue, south of Fourth Plain Boulevard and east of the railroad tracks).

    d. Height of Sign: Maximum fifteen (15') feet.

    e. Encroachment: Not allowed.

    f. Portable signs in the right-of-way as per 20.450.050(I).

2. Free-standing signs (on-site monument sign only).

    a. Allowable Area: One (1) square foot per face per lineal foot of frontage up to a maximum of two hundred and fifty (250 SF) square feet per face. Provided that premises with less than thirty-two (32') lineal feet of frontage shall be allowed a maximum thirty-two (32 SF) square foot sign per face.

    b. Number of Signs: One (1) per frontage.

    c. Height of Sign: Maximum fifteen (15') feet.

    d. Encroachment: No part of the freestanding sign shall project into any public right-of-way.

    e. No freestanding sign shall project or extend into any vision clearance area unless approved by the Planning Official.

f. Any freestanding sign must be integrated. That is, all supports or sign elements shall be an integral part of the design. Auxiliary projections or attachments not a part of a single design are prohibited.

3. Fascia signs.

   a. Allowable Area: Maximum twelve (12%) percent of the building's elevation on which the sign is erected with a guaranteed minimum of thirty-two (32 SF) square feet. Total of all sign areas shall not exceed two hundred and fifty (250 SF) square feet.

   b. Number of Signs: No maximum number, provided the total area of all signs complies with D1 above.

   c. Height of Sign: No sign shall extend above parapet or eave line.

   d. Fascia Signs: Fascia Signs may not encroach into right-of-way if less than eight (8') feet above grade.

4. Projecting signs.

   a. Allowable Area: Maximum fifteen (15%) percent of a building elevation on which the sign is erected. Total of all sign face areas shall not exceed two hundred and fifty (250 SF) square feet.

   b. Number of Signs: One (1) per elevation per business.

   c. Height of Sign: No sign shall extend above parapet or eave line.

   d. Encroachment: Above Public Right-of-Way: No encroachment allowed for signs less than eight (8') feet above grade; three (3') feet encroachment allowed for signs greater than eight (8') feet but less than or equal to ten (10') feet above grade; four (4') feet encroachment allowed for signs greater than ten (10') feet and less than or equal to twelve (12') feet above grade, and six (6') feet for signs more than twelve (12') feet above grade.

5. *Temporary signs.* Not allowed except as provided in 20.450.050(I).

6. Electronic message centers signs.

   a. The area of the electronic message center shall not exceed twenty (20%) percent of the area of the sign; provided the area limitation shall not apply if the sign is solely limited to time and temperature.

   b. All messages displayed on an electronic message center shall be directly related to the business for which the sign was constructed. No off-premises signage is permitted.

   c. All electronic message centers signs shall be constructed as an integral part of a permanent sign constructed on site. Integral shall be considered to be incorporated into the framework and architectural design of the permanent sign.

d. The display shall be limited to text and static images only and shall not appear to flash, portray blinking or chasing lights, or otherwise create continuously changing images. However, scrolling of text (horizontal or vertical) is permitted. The rate of change for sign copy from one (1) message to another shall be no more frequent than every eight (8) seconds and the actual copy change shall be accomplished in four (4) seconds or less. Once changed, the copy shall remain static until the next change.

e. All electronic message center signs shall have installed ambient light monitors and shall at all times allow such monitors to automatically adjust the brightness level of the electronic message center sign based on ambient light conditions.

f. Electronic message center signs shall not be associated with any dwelling or home occupation with a residential use.

g. Electronic message center signs which create a source of glare shall be adjusted or removed as directed by the Planning Official. No electronic message center sign may be illuminated to a degree of brightness that is greater than necessary for adequate visibility. In no case may the brightness exceed eight thousand nits (8,000) or equivalent candelas during daylight hours, or one thousand (1,000) nits or equivalent candelas between dusk and dawn.

h. Electronic message center sign permit applications must also include a certification from the owner or operator of the sign stating that the sign shall at all times be operated in accordance with City codes and that the owner or operator shall provide proof of such conformance upon request of the City.

7. Directional signs.

   a. Allowable Area: Maximum ten (10 SF) square feet per face per sign.

   b. Number of Signs: One (1) per function per frontage.

8. Industrial complex signs (free-standing signs).

   a. Allowable Area: One and a half (1.5 SF) square foot per face per lineal foot of industrial complex frontage up to a maximum of two hundred and fifty (250 SF) square feet per face. Provided that an industrial complex with less than thirty-two (32') lineal feet of frontage shall be allowed a maximum thirty-two (32 SF) square foot sign per face.

   b. Number of Signs: One (1) per complex frontage.

   c. Height of Sign: Maximum twenty (25') feet.

9. Allowable combinations of sign types.

   a. No signs attached to the building will exceed a total of fifteen (15%) percent of said building elevation.

b. On any frontage, these combinations are allowable:

i. Fascia and Free-Standing Signs.

ii. Fascia and Projecting Signs

iii. No other combinations allowed.

H. PO and NA District Signs. Signs allowed in the PO and NA Districts, the regulations and standards of this Section shall apply:

1. Freestanding (other than public sector) signs, rotating signs, flashing signs, rooftop signs, internally illuminated, neon and similar signs shall be prohibited. Freestanding public sector signs may be no larger than sixty-four (64 SF) square feet and no higher than twelve (12') feet. Externally illuminated signs are permitted.

2. Signs shall be located and designed to minimize interferences with vistas, viewpoints, and visual access to the District.

3. Signs shall not be placed on trees, other natural features, or public utility poles.

4. Visible braces and other supporting devices shall be incorporated as design features.

5. Signs shall be as small as possible to serve their intended purposes.

6. Signs relating to these districts and their use shall be consistent in design and color for easy recognition.

7. Signs shall be for public information relating to the particular district in which they are located or its use. Signs for other purposes are prohibited.

I. Portable Signs in the Public Right of Way.

1. Definitions.

a. Permanent Portable Signs shall be defined as "onsite" signs placed in the right-of-way along the business frontage and on the same side of the street of the building or establishment which it advertises. Permanent portable signs shall be meant for continuous display during the hours the business is open and shall have the primary purpose of identifying the business.

b. Temporary Portable Signs shall be defined as "off-site" signs placed in the right-of-way advertising an approved business or use. Temporary portable signs shall be displayed during the hours the business is open and shall have the sole purpose of identifying the business or providing directions.

2. General.
    a. Portable signs in the public right-of-way shall be allowed for approved uses in all zoning districts except in PO and NA districts, and subject to the standards in subsection 20.450.050(I). They may include off-site signs that advertise and are associated with an approved business or use or direct persons to premises different from where the sign is located.
    b. Portable signs shall not be allowed as part of home occupations or uses located within the LS and MS districts. Portable signs shall be permitted as part of a home occupation in all other districts except PO and NA districts.
3. Design standards.
    a. Portable right-of-way sign structures shall be in the shape of an inverted V, with two (2) sign boards attached to each other at the top of the sign (also known as a sandwich board or A-frame sign).
    b. Signs shall be constructed of weather-resistant materials, such as wood, plastic, or metal. Signs constructed of impermanent materials, including but not limited to cardboard and paper are prohibited.
    c. No materials such as paper, balloons, windsocks, etc., may be attached to the sign.
    d. No sign shall contain foil, mirrors, bare metal, or other reflective materials which could create hazardous conditions to motorists, bicyclists or pedestrians.
    e. No sign may contain lights of any kind.
4. Size and number of signs allowed.
    a. Maximum size of sign shall be nine (9 SF) square feet per sign face, with a maximum of two (2) sign faces per sign.
    b. Maximum of one (1) on-site sign per approved business or use on right-of-way abutting the business or use including businesses having more than one (1) street frontage.
    c. Maximum of three (3) off-site signs per approved business or use.
    d. Maximum height of sign shall be thirty (36”) inches above the sidewalk, walkway, or plaza upon which it is placed. The height of such signs may not be artificially increased above the allowed maximum by the placement of other materials.
5. Location of signs.
    a. One (1) portable sign allowed per business to be placed in the right-of-way along the business frontage (front or side street) and on the same side of the street of the building or establishment which it advertises.

b. Off-site temporary signs advertising an approved business or use shall be located within a one (1) mile (driving) radius from where the business or use is being advertised.

c. No sign may be placed in such a way as to reduce the continuous unobstructed width of a sidewalk or walkway to less than five (5') feet.

d. Sign placement may not obstruct an entrance to a building, steps or driveway access.

e. No sign may be placed within a sight vision clearance triangle as (required by Section 20.450.060 VMC) or within twenty (20') feet of a wheelchair ramp.

f. No sign shall be placed within the roadway, traffic island, median or circle.

6. Duration.

a. Permanent portable signs may be displayed in the right-of-way during the hours the business is open.

b. Temporary portable signs may be displayed in the right-of-way during the hours the business is open on Friday 10 a.m.-6 p.m., Saturday 10 a.m.-6 p.m. and Sunday 10 a.m.-6 p.m.

7. Additional Standards.

a. Owners are responsible for the removal of their portable signs following business hours and during periods of strong winds.

b. Off- site portable signs may be placed in the right-of-way abutting private property only with the written consent of the owner(s) of the property abutting the right-of-way and/or their authorized representative.

c. A portable sign placed in the right-of-way shall bear the name and address of the person/organization placing the sign.

8. Enforcement.

a. All new portable signs shall comply immediately with the above standards. All temporary signs (conforming and nonconforming) in existence prior to January 26, 2004, shall comply with the above standards within forty-five (45) calendar days after January 26, 2004.

b. The enforcement of this section shall be governed by the provisions of Title 22 of the Vancouver Municipal Code.

9. *Permit.* Portable signs in the right-of-way shall be exempt from the permit and fee requirements of this chapter.

J. Special Sign Districts.

1. Owners of property that occupy seventy (70%) percent or more of the linear street frontage of properties on both sides of the street in any area, may petition the City Council for the formation of a Special Sign District. This might be done for such reasons as to create or maintain an area with a particular cultural atmosphere, to stimulate a historic period, theater or entertainment area, or other similar purpose.

2. A group of property owners or persons in the right of possession will be chosen by such property owners to comprise an advisory body of the Sign District. This body will draw up the criteria for signs in the District and submit such proposed criteria to the Planning Official for his/her review and recommendation, and for review and recommendation by the Planning Commission prior to the submittal to Council for approval.

3. The Planning Official shall notify all owners or persons in the right of possession within the District of the proposed Special Sign District, after which the Council may approve the Special Sign District by ordinance following a public hearing.

4. If the criteria for the Special Sign District are approved and become effective, the City shall adopt them by ordinance as regulations of the Sign District.

K. Permits Required.

1. Except as otherwise provided in this chapter, it shall be unlawful for any person to erect, construct, enlarge, move, or convert any sign in the City or cause the same to be done, without first obtaining a sign permit for each such sign from the Planning Official. This shall not be construed to require any permit for a change of copy of any reader board sign, nor for the repainting, cleaning, and other normal maintenance or repair of a sign or sign structure for which a permit has been previously issued, so long as the sign or sign structure is not modified in any way. No new permit is required for signs which have permits and which conform with the requirements of this Code on the date of its adoption, unless and until the sign cabinet or profile is altered or the sign is relocated.

2. Every sign permit issued by the Planning Official shall become null and void if work is not commenced within one hundred and eighty (180) calendar days after the date of such permit. If work authorized by such permit is suspended or abandoned for one hundred and eighty (180) calendar days any time after the work is commenced, a new permit shall be first obtained to do so, and the fee will be one-half (1/2) the amount required for a new permit for such work, provided that no changes have been made in the original plans.

3. In emergency repair situations, work may be initiated and completed without first applying for a permit. However, a permit shall be applied for within forty-eight (48) hours after the first working day when work commenced on the sign.

L. Permit Application. Application for a sign permit shall be made in writing upon forms provided by the City, and shall state the following information:

1. Name, address, and telephone number of the applicant.
2. Name, address, and telephone number of the sign owner.
3. Location by street number of the building, structure, or lot to which or upon which the sign is to be installed or affixed.
4. A drawing to scale showing the design of the sign, including dimensions, sign size, method of attachment, source of illumination, and showing the relationship to any building or structure to which it is, or is proposed to be, installed or affixed, or to which it relates.
5. A plot plan, approximately to scale, indicates the location of the sign relative to property lines, rights-of-way, streets, sidewalks, and other buildings or structures on the premises.
6. The maximum and minimum heights of the sign.
7. The number, size, and location of all existing signs on the same building, lot or premises.

M. Permission to Install. No person shall erect or hang a sign upon any property or building without the consent of the owner or person entitled to possession of the property or building, if any, or their authorized representatives.

N. Issuance – Denial.

1. The Planning Official shall issue a permit for the erection, alteration or relocation of a sign within the City when an application therefore has been properly made and the sign complies with all appropriate laws and regulations of the City and all procedures required by City Ordinance have been complied with and completed.
2. The Planning Official may, in writing, suspend or revoke a permit issued under provisions of this chapter whenever the permit is issued on the basis of a misstatement of fact or fraud. When a sign permit is denied by the Administrator, he shall give written notice of the denial to the applicant, together with a brief written statement of the reasons for the denial.

O. Effect of Issuance. No permit for a sign issued hereunder shall be deemed to constitute permission or authorization to maintain an unlawful sign nor shall any permit issued hereunder constitute a defense in an action to abate an unlawful sign.

P. Fees. A fee shall be paid to the City at the time of issuance in accordance with the provisions of the City fee schedule.

Q. Commercial Sign Erector's License. In order to obtain a permit for the erection of a sign in the City (except painted wall graphics), the applicant must have a Washington State Contractors' license under Chapter 18.27 RCW, unless he is going to install a sign upon his own property and is exempted from such requirement by such statute.

R. License Non-transferable. No license shall be transferable and no holder of any license issued under this chapter shall allow his name to be used by any other party, either for the purpose of doing work or obtaining a permit under the penalty of forfeiting his license in addition to any fine levied, and the Planning Official is authorized to refuse to issue permits to the holder of any license violating this provision.

S. Planning Official. The Planning Official is hereby authorized and directed to enforce and carry out all provisions of this chapter, both in letter and spirit, with vigilance and with all due speed. The Planning Official is authorized to promulgate regulations and procedures consistent with the purpose of this chapter. The Planning Official is further empowered to delegate the duties and powers granted to and imposed upon him/her within this chapter.

T. Inspection by Planning Official. The Planning Official is hereby empowered to enter or inspect any building, structure, or premises in the City upon which, or in connection with which a sign, as defined by this chapter, is located, for the purpose of inspection of the sign, its structural and electrical connections, and to ensure compliance with the provisions of this chapter. Such inspections shall be carried out during business hours, unless an emergency exists. In the case of a residential use, the Planning Official shall secure assistance from the City Attorney, who may apply to a court for any necessary process to allow such inspection.

1. *Maintenance.* Every sign in the City, including but not limited to those signs for which permit fees are required, shall be maintained in good structural condition at all times.

2. *Signs declared unlawful.* The Administrator shall declare any sign unlawful and order its removal if he finds in writing that it endangers public safety by reasons of inadequate maintenance, dilapidation or abandonment. Any such declaration shall state the reasons of the Planning Official for stating that the sign constitutes a safety hazard to the general public, and must direct that it be corrected immediately or within a time to be set in such order.

3. Any sign owned, kept, displayed, or maintained by any person within the City, which is unlawful under the provisions of this chapter, is hereby declared to be in violation of this chapter. The Planning Official may declare any such sign to be unlawful, and such declaration shall state in writing the reason or reasons why such sign and the keeping, owning, maintenance, construction, and display of this chapter, and shall require its removal or repair within a time to be stated in such order.

U. Violation and Penalties. The provisions of VMC 20.140 apply to violations of this chapter.

V. Assurance of Discontinuance. In enforcing this chapter, the Planning Official may accept a written Assurance of Discontinuance of any act or practice deemed in violation of this chapter, or of any rule or regulation adopted pursuant hereto, from any person engaging in, or who has engaged in such act or practice. Any such assurance shall specify a time limit during which such discontinuance is to be accomplished. Failure to perform any such assurance shall constitute prima facie proof of a violation of this chapter or any rule or regulation adopted pursuant hereto order issued pursuant thereto.

W. Legal Nonconforming Sign. Any advertising structure or sign which prior to the effective date (12/19/79) of the sign code ordinance (M-2035) codified in this chapter has been lawfully erected, or for which a permit to erect it had been issued prior to the effective date of the sign code ordinance codified in this chapter and which is rendered nonconforming by this chapter may continue to exist but not to be increased in size. Provided, however, this section shall not apply to signs prohibited under subsection 20.450.050(C) of this chapter.

X. Liability. The provisions of this chapter shall not be construed as relieving or limiting in any way the responsibility or liability of any person erecting or owning any sign for personal injury or property damage resulting from the placement of a sign, or resulting from the negligence or willful acts of such person, its agents, employees, or workmen in the construction, maintenance, repair or removal of any sign erected in accordance with a permit issued hereunder. Nor shall it be construed as imposing upon the City or its officers or employees any responsibility or liability by reason of the approval or disapproval of any signs, materials, or devices under the provisions of this chapter.

Y. Structural and Material Requirements. All existing legally erected signs which are rendered nonconforming by the adoption of this chapter must comply with structural and material Code requirements of the Uniform Sign Code and the City Adopted Building Code at the time of any replacement, an alteration, or modification over and above routine maintenance.

Z. Construction or Suitability of Materials. All decisions by the Building Official concerning signs which involve questions of methods of construction or suitability of materials shall be subject to appeal to the Building-Fire Codes Commission pursuant to the provisions of VMC 17.08.040.

20.450.055 Solid Waste Disposal and Recycling

A. *Purpose.* The purpose of this chapter is to implement the recycling and waste management policies of the City and to support the goals, priorities, and strategies of the Clark County and State of Washington Solid Waste Management Plans. This chapter is further intended to facilitate the delivery of efficient, safe and convenient refuse and recycling services to customers using collection receptacles, trucks and technologies offered by the city's contracted solid waste collector.

B. *Chapter applicability.* This chapter applies to new and substantially remodeled residential and nonresidential construction projects where ongoing solid waste services are expected. Currently adopted Solid Waste Access and Design Standards are part of this chapter for implementation purposes. The Solid Waste Access and Design Standards may be updated as needed by the City Manager or their designee.

C. *Definitions.* For purposes of this chapter, the following definitions shall apply:

"Cart" means a collector-provided wheeled receptacle with attached lid less than one cubic yard in capacity suitable for the collection, storage, and curbside placement of garbage, recyclables, or organics. Carts shall be rodent and insect resistant.

"Cardboard cage" means a container designed to hold flattened, corrugated cardboard.

"City" means the City of Vancouver.

"Collector" or "collector of solid waste and/or recyclables" means a person, company or contractor with whom or which the City has entered into a contract by which the person or firm collects and removes solid waste and/or recyclables as provided in this chapter, and in the contract.

"Container" means a watertight metal or plastic receptacle equipped with a tight-fitting cover, capable of being mechanically unloaded into the collector's collection trucks which is not less than one cubic yard in capacity. A container is either wheeled or stationary. A stationary container does not have wheels and requires direct approach by a collection truck. A container may or may not be designed to be compatible with a compactor to hold compacted materials.

"Customer" means every person, firm, partnership, association, institution and corporation utilizing solid waste collection or recyclables collection services in the City. The term shall also mean the occupant and/or the owner of the premises for which service mentioned in this chapter is rendered.

"Curbside" means a location on a property, within five feet of the edge of a public street that does not block sidewalks, driveways or on-street parking.

"Designated servicing location" means a location to which receptacles are moved so that they may be serviced by a collection truck.

"Drop box" means an all-metal loose material or compactor receptacle with 10 cubic yards or more capacity that is mechanically loaded onto a specialized collection truck for transport to a processing or disposal site.

"Dwelling unit" or "unit" means any building or portion thereof which contains living facilities, including provision for sleeping, eating, cooking and sanitation, and including not more than one kitchen for not more than one family.

"Garbage" means all putrescible and nonputrescible solid and semi-solid wastes, including, but not limited to, rubbish, ashes, industrial wastes, swill, demolition and construction wastes, dead small animals completely wrapped in plastic and weighing less than 15 pounds, and discarded commodities that are placed by customers in appropriate receptacles for collection and disposal by the collector. The term "garbage" shall not include hazardous wastes, source-separated recyclable materials, or source-separated organics.

"Glass bin" means a Receptable suitable for household collection, storage, and Curbside placement of source-separated recyclable glass.

"Multifamily residence" means a multiple-unit residence with seven or more dwelling units on a consolidated solid waste collection bill.

"Occupancy" has the same meaning as defined in VMC 17.14.030

"Organics" means any organic waste material that is source-separated for processing or composting, such as yard debris and food scraps generated by any residential or commercial customers.

"Parent parcel" has the same meaning as defined in VMC 20.150.

"Receptacle" means a can, cart, container, glass bin, or drop box or other containment for garbage, organics, or recyclables.

"Recyclable materials" means materials which have passed through their originally intended usage, have use or value as a commercial commodity, and are intentionally separated from solid waste by their original consumer for collection for the purpose of recycling, reuse, reprocessing or remanufacture in accordance with this chapter and chapter 5.62 VMC. "Recyclable materials" include but are not limited to paper, cardboard, metal, aluminum, glass, plastic, yard debris, used motor oil or other materials as may be designated by City administrative rule and/or the Clark County Comprehensive Solid Waste Management Plan.

"Residence" or "residential" means any house, dwelling, multiunit residence, apartment house, trailer court or any building put to residential use.

"Solid waste" means and includes all forms of putrescible and nonputrescible wastes including but not limited to garbage, rubbish, refuse, household animal waste, dead animals under 200 pounds, nonrigid containers (bags), rigid pesticide containers that have been properly decontaminated by jet

or multiple rinsing, residential ashes, industrial wastes, swill, demolition waste, special waste and construction wastes, other materials and substances that are currently or may in the future be included in the definition of "solid waste" in ORS 459.005 or RCW 70.95.030 and which are accumulated in any public or private residence or commercial, business or industrial establishment; provided, for the purposes of chapter 6.12 and chapter 5.62 VMC, "solid waste" shall not include industrial byproducts, nor sewage, and shall not include hazardous wastes, or recyclable material which is source-separated and set out for recycling purposes as such terms are defined in this chapter.

"Storage area" means an area where receptacles are stored. If a storage area is not intended to be serviced by a collection truck, then receptacles would only be stored in the storage area on days that are not scheduled collection days. If a storage area is intended to be serviced by a collection truck, then receptacles would be stored in that storage area on collection days and non-collection days.

"Substantially remodeled building" means a remodeled building for which the total cost exceeds one-half of the assessed value of the building for property tax purposes at the time the contract for the remodel work was made and any remodel project resulting in a change of occupancy or in the addition of at least one residential dwelling unit.

"Truck staging location" means the area where a collection truck will sit while the collection truck driver brings receptacles to the truck for servicing.

D. Amount of Storage Required.

1. *Storage area size criteria.* The minimum storage area size required for solid waste, including recyclable materials and organics, is based on the predominant use(s) of the building, i.e., residential, office, retail, educational/institutional, commercial/industrial or other. If a building has more than one of the uses listed in this section, then the storage area size requirement for the whole building must be the sum of the storage space required for each use.
2. *For multiple uses.* If there are multiple uses on a single lot, storage areas may be shared.
3. *Storage area standards.* Storage areas must be provided as follows:
    a. Residential buildings with one-to-six units must have at least one storage area outside of the right-of-way for storage of receptacles when not set out for collection day. This requirement must be met using one of the following methods:
        i. Provide one storage area per unit. Each storage area must be sufficient to contain receptacles for typical residential services detailed in the currently-adopted City Solid Waste Access and Design Standards.

ii. Residential buildings on the same lot or different lots derived from the same parent parcel containing one-to-six units for which a home ownership association or other entity exists or will exist as a sole source for utility billing must have sufficient storage space to contain the required residential weekly storage volumes.

b. Residential buildings containing seven or more units must have at least one storage area such that the total storage space is sufficient to contain the required residential weekly storage volumes.

c. Residential weekly storage volumes:

i. Number of units × 32 gallons = Total weekly storage volume for garbage.

ii. Number of units × 48 gallons = Total weekly storage volume for recyclable materials.

iii. Number of units × 4 gallons = Total weekly storage volume for glass.

iv. Number of units x 1 gallon= Total weekly storage volume for organics.

d. Nonresidential buildings must provide a minimum storage space of 100 square feet in addition to the following:

i. Office: four square feet for each 1,000 square feet of gross floor area (GFA);

ii. Retail: 10 square feet for each 1,000 square feet of GFA;

iii. Educational/institutional: four square feet for each 1,000 square feet of GFA; or

iv. Other: four square feet for each 1,000 square feet of GFA.

e. Any project that utilizes a garbage compactor must install a concrete pad sized and appropriate for the intended equipment and the volume of waste to be generated, including sufficient additional space for receptacles for materials not compacted.

f. Storage area dimensions and equipment and receptacle placement must be consistent with receptacle dimensions, collection truck access and service frequency assumptions set forth in the City's currently-adopted Solid Waste Access and Design Standards.

g. City may require a service agreement between the building owner and the collector if the solid waste servicing methods or technologies proposed or used are atypical or unproven.

E. Location, Design and Access Standards.

1. *Location.* Storage areas must comply with the following:

a. Receptacles for recyclable materials and organics must be stored at the same location(s) as the receptacle(s) for garbage.

b. Indoor and outdoor storage must comply with City's currently-adopted building and International Fire Code requirements.

c. All residential units must be within 150 feet of the nearest storage area.

d. Exterior storage areas are prohibited in a side or rear yard setback that abuts property that is not within the same development in order to minimize impacts on neighboring properties.

e. Storage areas, including gates or doors, must not obstruct pedestrian or vehicle traffic movement.

2. Design standards.

a. Plans must include sufficient details to determine whether City Solid Waste Access and Design Standards are met. The dimensions of each storage area must accommodate receptacles consistent with current methods of local collection and allow for user movement between receptacles.

b. If a storage area is covered, the cover height must allow for maneuvering and servicing of the intended receptacles pursuant to the currently-adopted City Solid Waste Access and Design Standards.

c. Plans for storage areas shall comply with currently-adopted City Solid Waste Access and Design Standards. Receptacles must be labeled to show the intended contents and location of each receptacle, whether garbage, recyclable materials, or organics.

d. Exterior storage areas must show user safety and aesthetic details on plans.

i. Exterior storage areas must be screened from view by a wall, a fence and/or vegetation.

ii. Storage areas for residential buildings with seven or more residential units must have a tenant access door, gate, or walkway separate from the service gate or door.

iii. If a storage area is shared by more than one residential building, the applicant must provide a pedestrian path to any shared solid waste storage areas intended for resident access. The path must be hard-surfaced and a minimum of 36 inches wide or 48 inches wide where the facilities are required to be accessible.

3. Access standards.

a. Applicant shall submit a solid waste access and collection plan.

b. Any storage area intended to be serviced by the collector must be fully accessible to collection trucks.

c. For residential collection where collection is not feasible at curbside, collection may occur from a designated servicing location located no further than 150 feet from any unit it serves. Designated servicing locations must be shown on the solid waste access and collection plan and sized to accommodate the receptacles associated with the City's garbage, organics and recyclable materials collection system.

d. Circulation and turnaround designs shall comply with VMC 11.80.070 and the Transportation Standard Details and be feasible using City-provided solid waste truck turning modeling templates and collection truck specifications.

   i. Collection trucks must be able to circulate the development and service locations with minimal backing. If a storage area is intended to be serviced by the collector, it must be accessible to collection trucks without having to back out of a driveway or parking lot onto a public street.

   ii. If a storage area is intended to be serviced by the collector and only a single access is available to that location, then adequate turning radius must be provided to allow collection trucks to safely exit the site in a forward motion.

   iii. A collection truck turnaround must be provided where more than four residential lots would share a designated servicing location or if the distance from the designated servicing location to a lot is greater than 150 feet.

e. Property owners may limit access to a storage area for security reasons so long as storage areas are accessible to intended users and the collector(s) at all times with security access such as a key, fob or code.

f. All storage areas intended to be serviced by the collector and designated servicing locations must be designed to be easily accessible to collection trucks and equipment, considering paving, grade and truck access.

   i. Storage areas intended to be serviced by the collector and designated servicing locations must not obstruct sidewalks, bike lanes, or vision clearance triangles.

   ii. Where receptacles must be removed from a storage area to be serviced by a collection truck, the grade, ramp design, and path of travel must be designed to account for the weights and size of receptacles that can reasonably and safely be managed for roll-out to an accessible collection truck loading position.

   iii. If collection trucks cannot directly access a storage area, and the collector is expected to move compacted containers larger than two cubic yards to the collection truck, mechanized equipment such as motorized pushcart and associated power source must be installed and maintained by owner.

iv. If an enclosed storage area is intended to be serviced by the collector, then service gate(s) or door(s) are required for collector access.

g. Service gates and doors must be designed to open wide enough for the intended receptacles to be safely maneuvered out of the storage area. Service gates and doors for collector access must be capable of being secured in closed and open positions. Gates or doors must swing open 90 degrees or greater.

F. Deviations from Chapter—Substantial Remodel. For substantial remodels, in cases where the nature of existing construction would make strict adherence to the requirements of this chapter impractical, the requirements may be modified by the Public Works Department. The Public Works Department may establish administrative rules and regulations to implement this section.

1. *Submission Requirements.* A person may apply for modification from these requirements. The application must include an explanation of the factors justifying the deviation from these requirements, including how the development proposal differs from other developments and adopted standards. The request shall also include at least a plan or narrative showing or describing the applicable conditions, existing and proposed storage areas for solid waste, including recyclable materials and organics, and modeled truck turning, if needed to evaluate collector access. All proposed modifications shall be indicated on the plans submitted with the development application.

2. Approval Criteria.

a. In reviewing a modification request, the City shall consider at least the following:

i. Collector safety;

ii. Convenience to users;

iii. Compatibility of proposal with current methods of collection;

iv. Advancing the intent of this chapter; and

v. Potential benefits of low impact development or innovative concepts.

b. Any modification shall be the minimum necessary to achieve this chapter's intent.

c. Self-imposed hardships shall not be used as a reason to grant a modification request.

d. Modifications to the requirements of Section 20.450.010 may be granted if the applicant demonstrates both of the following:

i. The proposed alternative is safe for the collector;

ii. The proposed alternative is feasible given current methods of collection.

e. In evaluating the proposed alternative, the city may consult with the city's contracted solid waste collector.

3. *Approval Process.* Requests to modify solid waste storage requirements shall be made in conjunction with the application for any related or underlying development proposal, and shall be processed in conjunction with that application pursuant to Title 20 or Title 17 for the underlying development proposal.

20.450.060 Vision Clearance

A. Purpose. The purpose of this chapter is to ensure that development or redevelopment on a site will not impede visibility of operators of motor vehicles using the City's street system.

B. Development Standards.

1. Conditional sight obstructions. Nothing in this title shall be deemed to permit a sight obstruction at a street intersection or service drive interfering with the view of the operation of motor vehicles on the streets to such an extent as to constitute a traffic hazard.

2. Provisions with precedence. The provisions of this Section shall take precedence over any building and parking setbacks, except in the MX and RA districts where the city transportation manager may authorize lesser requirements upon a finding that the public health, safety and welfare will not be adversely impacted.

3. Provisions for established vision area. There shall be no sight obstruction between thirty (30") inches and ten (10') feet above the street grade within the triangular vision clearance area established as follows:

a. *Street Intersection.* In the case of a street intersection, or street and alley intersection, two (2) sides of this triangle are lot lines measured twenty (20') from their intersection, and the third side is a line across the corner of the lot joining the extremities of the other two (2) sides. See Figure 20.450.060-1.

b. *Commercial Driveways and Private Streets.* In the case of service drives, a triangle whose base extends thirty (30') feet along the street right-of-way line in both directions from the centerline of the service drive with the apex of the triangle thirty (30') feet into the property on the centerline of said service drive. See Figure 20.450.060-2.

c. *Residential Driveways.* In the case of a private driveway, two (2) sides of the triangle are measured seven (7') feet from the intersection of the right-of-way line and edge of the driveway, one side extending up the driveway and the other along the public right-of-way. The third side of the triangle is a line connecting the extremities of the other two (2) sides. See Figure 20.450.060-3.

d. *Residential Driveways on Alleys.* In the case of private driveways on an alley, this section shall not apply.

FIGURE 20.450.060-1. STREET INTERSECTION

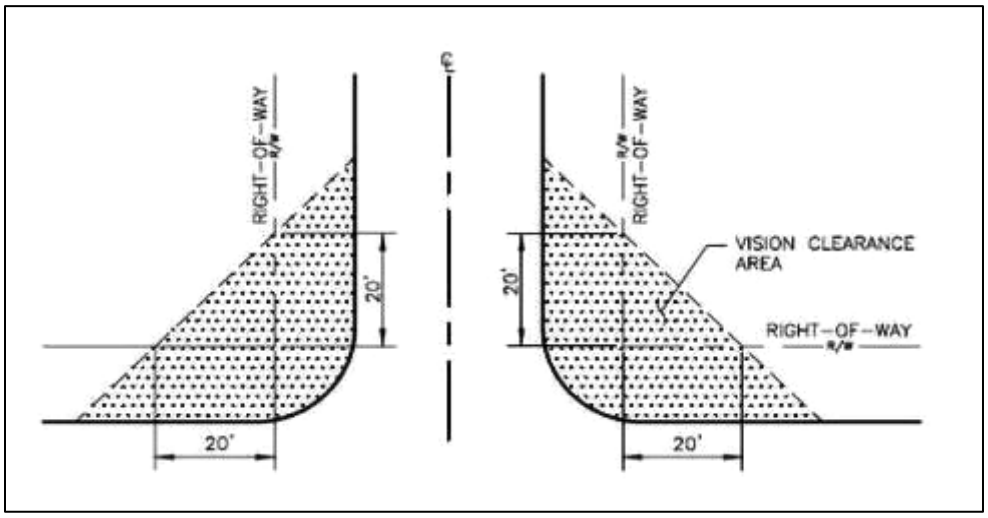


FIGURE 20.450.060-2. COMMERCIAL DRIVEWAYS AND PRIVATE STREETS

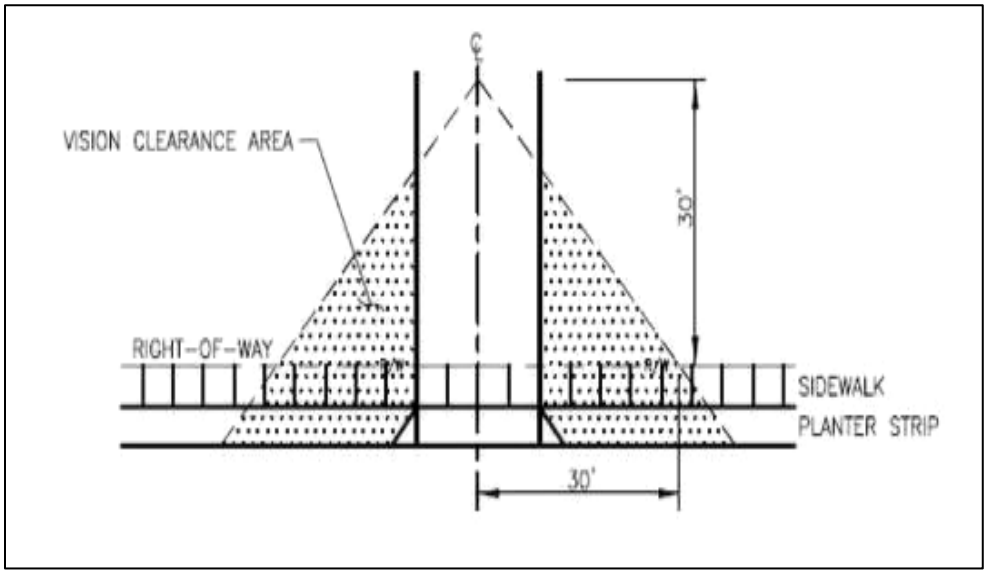
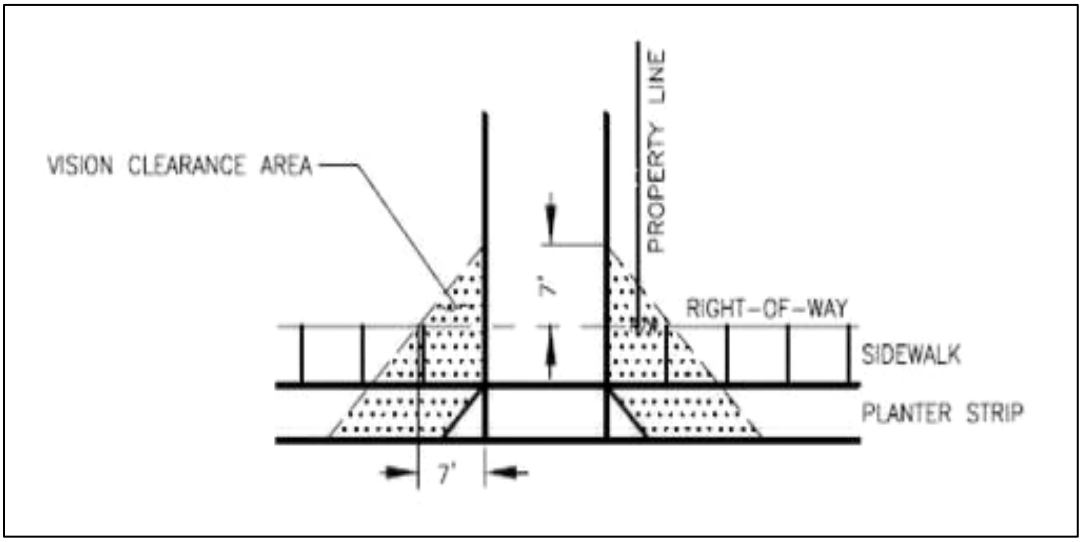


FIGURE 20.450.060-3. RESIDENTIAL DRIVEWAYS



20.450.065 Essential Public Facilities

A. *Purpose*. The purpose of this Chapter is to fulfill the requirements of the Growth Management Act by accommodating Essential Public Facilities of state or regional significance, including but not limited to airports, state education facilities, state or regional transportation facilities; prisons, jails and other correctional facilities; secure community transition facilities; and solid waste facilities.

B. Development Requirements.

1. *Applicability.* Essential Public Facilities where not prohibited, shall be conditional uses per the requirements of Chapter 20.245 VMC, Conditional Uses and shall be subject to the additional requirements contained in subsection (B) below.

2. Requirements.

a. Early notification and involvement of affected citizens and jurisdictions shall be provided as follows: At least ninety (90) days before submitting an application for such a facility, the prospective applicant shall notify the affected public and jurisdictions of the general type and nature of the proposal, identify sites under consideration for accommodating the proposed facility, and identify opportunities to comment on the proposal. Applications for specific projects shall not be considered complete without proof of such a published notice in a local newspaper of general circulation.

b. If it will generate substantial traffic as determined by the City's Transportation Engineering Manager, such a facility shall be located near a major transportation corridor(s) served or planned to be served by mass transit.

c. Inter-jurisdictional agreements shall be developed to mitigate any disproportionate financial burdens which may fall on the local jurisdiction within which a facility of a state, regional, or county-wide nature is located.

d. The proposed project shall comply with all applicable provisions of the Comprehensive Plan, Title 20 and other applicable provisions of the Municipal Code, SEPA, and other federal, state and local statute, codes and ordinances.

e. Applicants for such a facility shall provide an analysis of the alternative sites considered for the proposed facility. This analysis shall include the following:

   i. A justification of the need for the proposed facility in the proposed location. The applicant shall demonstrate that less impacting alternatives have been considered and found not to be feasible.

   ii. The applicant shall also describe the process used to identify and evaluate alternative sites.

   iii. An evaluation of the sites' capability to meet basic siting criteria for the proposed facility, such as size, physical characteristics, access, and availability of necessary utilities and support services.

   iv. The sites' relationship to the service area and the distribution of other similar public facilities within the service area or jurisdiction, whichever is larger.

   v. A description of the relative environmental, traffic and social impacts associated with locating the proposed facility at the alternative sites that meet the applicant's basic siting criteria. The applicant shall also identify proposed mitigation measures to alleviate or minimize adverse impacts.

f. Special provisions for specific types of essential public facilities.

   i. Secure community transition facilities conforming with the standards set forth below may be approved by conditional use permit following notice to all property owners and occupants of record within fifteen hundred (1,500') feet of the proposed site.

      (A). Secure community transition facilities shall conform with all substantive, procedural and operational requirements set forth in RCW Chapter 71.09 and rules, regulations, and policy guidelines promulgated under the authority thereof or in response thereto.

      (B). Secure community transition facilities shall provide the following staffing and security measures:

(1). The owner and operator of the secure community transition facility shall submit and maintain a plan for staffing, security measures, procedures for immediate public notification of escapes, and escapee search procedures ("the Plan"), all in a form and content satisfactory to the Planning Official. The security measures shall indicate the types of security measures/facilities proposed for the secure community transition facility including, but not limited to, constant electronic monitoring of residents, site security measures/equipment, and site access and control consistent with Chapter 71.09 RCW, unless otherwise ordered by a court. The plan, along with documentation of the Planning Official's concurrence in or rejection of the plan, shall be included in materials submitted to and reviewed by the Hearing Examiner, provided that the security plan made part of the public record shall not be in such detail that security of the facility would be compromised.

(2). The owner and operator of the secure community transition facility shall enter into a contract with the city, in a form and content satisfactory to the City Attorney, committing the owner and operator to comply with and maintain the plan for the life of the facility.

(3). The applicant shall install an eight (8') foot high fence, in character with the surrounding area, between the facility and all property boundaries. The Hearing Examiner may waive or lessen this requirement upon finding that due to existing site features or the type or character of adjoining uses, the privacy and security of the occupants of adjoining properties can be maintained in the absence of a fence or with a lower fence.

(4). The facility shall have a backup power source.

(C). No such facility shall be located adjacent to, immediately across a street or parking lot from, or within the line of sight of a risk potential activity or facility as defined in RCW 71.09.020. For purposes of this subsection, those specific risk potential activities and facilities described in the applicable state law shall be interpreted as follows and shall include such facilities located within the City of Vancouver and all neighboring jurisdictions:

(1). Public and private schools and their grounds;

(2). School bus stops;

(3). Licensed child daycare and licensed preschool facilities;

(4). Public parks;

(5). Publicly dedicated trails;

(6). Sports fields;

(7). Playgrounds;

(8). Recreational and community centers;

(9). Places of worship such as churches, synagogues, temples, and mosques;

(10). Public libraries;

(11). Any other risk potential activity or facility identified in siting criteria by the Department of Social and Health Services with respect to siting a secure community transition facility.

20.450.070 Dark Sky Outdoor Lighting Requirements

A. Purpose. The standards of this chapter are intended to protect the night sky, increase bird safety, reduce light pollution and energy waste, and enhance public health and safety by establishing responsible outdoor lighting practices that are consistent with International Dark-Sky Association (IDA) guidelines.

B. Applicability. The following standards apply to new construction that require a land use review:

1. Residential buildings (7 or more dwelling units)
2. Commercial and industrial buildings
3. Public buildings and infrastructure
4. Outdoor storage, recreational facilities, and surface parking lots

C. Exceptions and Adjustments

1. Lighting required by state or federal law (e.g., FAA, ADA).
2. Temporary lighting for special events, holidays, construction, or emergency response.
3. Strict compliance with lighting standards for special uses such as historic structures, art installations, etc. may be adjusted by the Planning Official provided off-site impacts are minimized.
4. Security lighting at existing and future Port of Vancouver Marine Terminals is exempt from the maximum footcandles in Section F but shall be directed downward or shielded to prevent shining above the horizontal plane to the maximum extent practicable while considering safety and security needs.
5. Temporary lighting for emergencies or public safety if no reasonable alternative exists, as determined by the Planning Official.

6. The Planning Official may waive or modify the outdooring lighting plan submittal requirements if compliance with the standards in subsection 20.450.070(F) General Standards, can be otherwise demonstrated.

D. Definitions

Correlated Color Temperature (CCT): A measure of the color appearance of the light source, rated in Kelvins (K). Lower values (<3000K) produce warmer, amber-colored light; higher values produce cooler, bluish light.

Fully Shielded Fixture: A light fixture constructed so that no light is emitted above the horizontal plane of the fixture.

Horizontal Illuminance: The total luminous flux incident per unit area on a horizontal surface, typically measured in lux (lumens per square meter) or footcandles. It defines the density of light falling on a horizontal plane parallel to the ground, such as a parking lot, roadway, or floor.

Overlighting: The use of lighting levels significantly above those recommended for a given task or area, resulting in excessive glare, wasted energy, or unnecessary skyglow.

Vertical Illuminance: The amount of luminous flux incident per unit area on a vertical plane, commonly measured in lux (lx) or footcandles (fc). It measures light falling on vertical surfaces like walls, signage, etc.

E. Outdoor Lighting Plan Required

1. The applicant shall submit an outdoor lighting plan prepared by a qualified professional, certified lighting professional or licensed professional electrical engineer using lighting design software and luminaire files demonstrating compliance with this section. The outdoor lighting plan shall clearly identify any lighting that is exempted by subsection 20.450.070(C).
2. The outdoor lighting design shall be prepared using lighting design software and Luminaire .ies files. The outdoor lighting plan shall include:
    a. Luminaire identification (model number), installation locations, mounting heights, targeted directions, buildings, and other physical objects within the site that could affect the lighting outcome.
    b. Site plan and Illuminance calculation plots demonstrating conformance with this section.
3. A preliminary outdoor lighting plan shall be submitted with the land use application and a final outdoor lighting plan shall be submitted with engineering plans and a building permit application.

F. General Standards

1. *Shielding Requirements*. All outdoor light fixtures shall be fully shielded to emit no light above the horizontal plane (0% uplight).

2. *Color Temperature Limits*. Light sources must have a CCT of 3000K or lower, unless otherwise approved for safety or wayfinding reasons.
3. *Curfew/Dimming Controls*. Lighting for non-residential uses shall be dimmed by not less than fifty percent (50%) or turned off during non-operational hours (e.g., after 10 pm to sunrise), except where the Planning Official has determined such lights are needed for security and should not be dimmed or turned off.
4. *Illumination Levels (Footcandles)*. Lighting levels shall not exceed the maximum average horizontal illuminance levels in Table 20.450.070-1 below.

TABLE 20.450.070-1 MAXIMUM PERMITTED ILLUMINANCE

Use/Development Type	Max. Avg. Illumination (fc)	Notes
General site lighting outside of parking areas (commercial and industrial uses)	3.0	
Parking lots and outdoor storage areas (residential, commercial and industrial)	2.0	Uniformity ratio ≤ 4:1
Walkways/sidewalks	1.0	Residential: ≤ 0.3 fc recommended
Building entries	1.0	For general wayfinding
Signage (externally lit)	2.0	Lighting must be directed downward and shielded
Automotive sales lots and service station canopy underlighting	20.0	Lighting must be directed downward and shielded

Source: IESNA RP-8-18, IDA Guidance, and local energy codes.

5. *Upward Directed Lighting*. Uplighting is prohibited except for flagpoles, public monuments, or historic structures, and only if fully shielded and using ≤ 3000K sources.
6. *Sign Lighting*. All externally illuminated signs must use shielded fixtures directed only at the sign face. Internally illuminated signs must use opaque backgrounds with lighted text or graphics.

G. Light Trespass Control

1. *Prohibition of Light Trespass*. Outdoor lighting must be installed and maintained to ensure that no direct light is emitted onto adjacent properties, especially residential zones, or public rights-of-way.

2. *Maximum Vertical Illuminance at Property Line*. Measured at 5 feet above grade on the property line of adjacent lots, vertical illuminance from a light source on any site shall not exceed the maximum footcandles in Table 20.450.070-2 below.

TABLE 20.450.070-2 MAXIMUM VERTICAL ILLUMINANCE AT PROPERTY LINE

Adjacent Use	Maximum Vertical Illuminance (fc)
Residential Zone	0.1 footcandles
Non-residential (e.g., commercial, industrial)	0.5 footcandles
Public right-of-way or park	0.2 footcandles

3. *Mitigation Measures*. If measured or observed light trespass exceeds the above limits, corrective measures such as re-aiming, shielding, dimming, or fixture replacement may be required by the City.

H. Ongoing Compliance Required. Lighting fixtures, illuminance, shielding, etc. shall be maintained over time in compliance with this chapter. Violations may be subject to enforcement action by the City per VMC 20.140, Enforcement.

20.450.075 Wireless Communications Facilities Standards

A. *Purpose.* In addition to accomplishing the general purposes of the Comprehensive Plan and Title 20, the purpose of this chapter is to set forth the regulations for the placement, development, permitting, and removal of wireless communications facilities, including support structures and antennas. The purposes of this ordinance are to:

1. Minimize the adverse visual, aesthetic and safety impacts of wireless communications facilities or residential districts and on the community as a whole.
2. Establish clear and objective standards for the placement, design and continuing maintenance of wireless communications facilities,
3. Ensure that such standards allow competition and do not unreasonably discriminate among providers of functionally-equivalent services.
4. Encourage the design of such facilities to be aesthetically and architecturally compatible with the surrounding built and natural environments.
5. Encourage the location of wireless communications support structures in nonresidential areas.

6. Encourage the co-location or attachment of wireless communications antennas on existing support structures or to help minimize the total number and impact of such structures throughout the community.

B. Applicability.

1. *Exemptions.* The requirements of this chapter shall apply to all new wireless communications facilities and the expansion and/or alteration of any existing facilities within the city limits, subject to the following exemptions:

a. Satellite earth stations using antennas not more than two meters in diameter in commercial and industrial districts and direct-to-home satellite services using any size antenna in any district.

b. Send-and-receive citizen band radio antennas operated by federally licensed amateur (ham) radio operators.

c. Industrial, scientific and medical equipment as regulated by the FCC in 47 CFR Part 18.

d. Military and government radar antennae and associated communication towers used for navigational purposes as regulated by the FCC by 47 CFR Parts 97 and 95 respectively:

i. Military and federal, state and local government communications facilities used for emergency preparedness and public safety purposes; and

ii. Normal, routine and emergency maintenance and repair of existing wireless communications facilities which do not increase the size, footprint or bulk of such facilities and which otherwise comply with city, state and federal law and regulations.

2. *Process Type.* See Wireless Summary Table in subsection 20.450.075(M), below for Type I, Type II, and Conditional Use Permit types.

3. *General development standards.* Those wireless communication facilities which require a conditional use permit to be located in the applicable zoning district are subject to the general development standards of VMC 20.450.075(B)(3); the specific approval criteria of VMC 20.450.075; and the general conditional use approval criteria contained in Chapter 20.245 VMC governing conditional uses.

4. *BPA Transmission Lines.* BPA transmission towers and municipal water towers shall be considered wireless support structures for the purposes of co-locations.

C. Nonconforming Situations. Wireless communications uses and structures in existence as of 12/21/98 which are nonconforming as to the use or development standards of this ordinance shall be subject to the provisions of Chapter 20.195 VMC, Nonconforming Situations, except that new antennae may be permitted to co-locate on pre-existing wireless communication support structures subject to the development standards contained in Section 20.450.075 VMC.

D. General Development Standards. The following minimum development standards shall apply to all wireless communications facilities in addition to any development standards that apply in the underlying zoning district in which a wireless communication facility is located and/or additional requirements in any conditions of approval attached to a conditional use approval. In the event of a conflict between the standards of this section and other applicable development standards of this title, the more stringent standards shall govern.

1. *Anti-climbing devices.* All wireless communications support structures and required fencing shall be equipped with appropriate anti-climbing devices.
2. *Attachment to trees prohibited.* It is prohibited to attach any wireless communications facility or portion thereof to any tree.
3. *Signs.* All wireless communications support structures shall be identified with a nonilluminated sign not exceeding four square feet. The sign shall list the wireless service provider's name and emergency telephone number and shall be posted in a place visible to the general public.
4. *Historical registry/district.* Wireless communications facilities locating on any site or existing building that is on a historic register or in a historic district shall be subject to the applicable design standards prescribed by the local, state or federal agency with jurisdiction over such register or district.
5. *Lighting.* Wireless communications facilities shall not be illuminated except where required by the FAA, or the Washington Department of Transportation, Aeronautics Division.
6. *Painting.* Wireless communications facilities shall be painted or finished in a manner that blends with the dominant background, except where otherwise required by the FAA or Washington Department of Transportation, Aviation Division. The applicant and the operator of the facility shall have a continuing duty to maintain such paint or finish.
7. *Setbacks.* The following setback standards shall apply to wireless communications facilities:
    a. Accessory equipment structures and wireless communications support structures which are attached to existing buildings or other permanent structures shall comply with the setback requirements for the underlying district.
    b. Free-standing wireless communications support structures located in any district shall be set back from any property line of an abutting residential use or district by a distance equal to the height of the wireless communications support structure, or the setback of the underlying district, whichever is greater.
    c. Setbacks for free-standing wireless communications support structures shall be measured from the ground-level base of the structure.

d. The setback in any district may be reduced by means of a Type I review if the applicant can demonstrate that:

   i. Reduction in the setback increases the screening opportunities between the facility and abutting residential and other uses, for example, by placement behind tall trees, in tree groves, behind buildings or near other tall elements; and

   ii. The reduction in setback allowed is the minimum required to achieve increased visual screening of the facility from abutting residential uses.

8. *Landscaping standards.* Wireless communications facilities in residential and commercial districts shall be subject to the following landscaping and screening standards:

   a. The perimeter of the wireless communication support structure and any guy wires and anchors shall be enclosed by a fence or wall per requirements contained in Chapter 20.450.035 VMC, Landscaping and Tree Conservation.

   b. Within the required setback, the applicant shall provide landscaping to include: at least one row of evergreen shrubs spaced not more than five feet apart and capable of growing to form a continuous hedge at least five high within five years of planting, and evergreen trees or shrubs, spaced not more than 15 feet apart or less than four feet high when planted.

   c. Landscape materials shall be selected and sited to produce a hardy and drought-resistant landscape area and approved by the Planning Official or his designate.

   d. Maintenance of the landscaped area shall be the responsibility of the applicant and/or operator of the facility. Required landscaping must be maintained in a healthy condition. Trees and shrubs that die must be replaced with healthy materials of the same or similar species and same size to the extent practicable.

   e. Temporary irrigation shall be provided to help ensure survival during the critical establishment period.

   f. The Planning Official or his designate may allow the use of landscaping and screening other than that described in subsections (H)(1) and (H)(2) of this section if the applicant shows the proposed landscaping and screening will achieve at least the same degree of screening provided pursuant to those subsections when viewed from off-site public areas and residences.

9. *Height standards.* The following standards shall apply to wireless communications facilities:

   a. The height of a wireless communications facility shall include the support structure and any attached antennae proposed at the time of application.

b. The maximum height of wireless communications support structures and their antennae shall meet the maximum height standards of the underlying zone, except that all new support structures or attached antennae that exceed 100 feet in overall height in any zoning district shall require a Type III conditional use permit. A conditional use permit is not required for height increases of ten (10%) percent or less.

   i. A lightning rod, not to exceed 10 feet in height, or FAA-required lighting shall not be included within the height limitations;

   ii. Antennas or equipment shelters that are mounted on existing buildings or structures, or other wireless communications support structure or collocated facilities, in residential, commercial and industrial districts are exempt from the height restrictions of the underlying zone, but shall be no more than 15 feet taller than the existing building or structure on which the antennas are mounted.

c. The height limitation exemptions contained in Section 20.450.015 VMC, Exceptions and Interpretations, shall not apply to wireless communications support structures and antennas.

10. *Parking.* Each site for a wireless communications support structure shall designate one adjacent parking space. An existing parking space on a parent site may be utilized to meet this standard.

11. *Dispersal.* (Reserved)

12. *Access.* Whenever possible, vehicular access to the facility shall be incorporated into the existing driveway of a site.

13. *Insurance.* Liability insurance in an amount not less than $1,000,000 shall be maintained by the owner and operator of the facility until such facility is dismantled and removed from the parent site. Failure to maintain insurance coverage shall constitute a violation of this chapter and grounds for revocation of a permit.

14. *Performance bond.* The applicant or facility operator of the facility shall obtain and keep in force throughout the time the facility is located on the site a performance bond payable to the city in the amount of not less than $1,000 or such other greater amount as found by the Planning Official or his designate to be, to cover the estimated reasonable costs of removal of such facility by the city if required pursuant to VMC 20.450.075.K; these include direct and administrative costs associated with demolition, dismantling, removal and disposal of the facility by the city or its contractor. The bond shall be reviewed by the Planning Official or his designate every five years to ensure that it is sufficient to cover the costs of removal. Additionally, the applicant or facility operator shall post a separate bond for a two-year period following issuance of approval for the facility, in the amount of not less than $1,000 or such greater amount as found by the Planning Official or his or her designate to be sufficient to cover the cost of maintaining landscaping and/or screening of the facility.

15. *Building and utility permits.* The applicant for a permit pursuant to this chapter shall submit an application, plans, specifications and all other materials to obtain a building permit and any applicable utility permits. Such permits may be applied for either concurrently or after approval of other permits required by this chapter. Submittal requirements for attached antennas and co-locations are subsection M of this section, liability insurance; subsection N of this section, Performance Bond; and a lease agreement.

16. *Screening.* For new support structures and accessory equipment to be located in any district other than industrial districts, visual impacts must be mitigated to the greatest extent practicable by using stealth design, camouflage or screening, including but not limited to: fencing, landscaping, strategic placement adjacent to existing buildings or existing vegetation, placement of accessory equipment structures underground, and/or incorporation of wireless facilities into the architectural features of existing buildings or structures. Mitigation may also include design compatibility with key elements in the surrounding area, such as: use of brick or other material similar to that used in adjacent buildings or structures; visually blending of support structures with compatible architectural features such as flag poles, bell towers or cornices; or use of existing vegetation to camouflage support structures.

17. *Replacement of existing structures.* A wireless communications support structure may be permitted by means of a Type I procedure as governed by VMC 20.210.040, subject to the standards in the underlying zoning district, except where otherwise noted in the use provisions of this chapter, if it replaces an existing pole, light standard, telecommunications pole or other pole-like structure of the same or greater height, and is not more than twice the same circumference of the pole being replaced, and the antennas attached to such monopole otherwise meets the applicable standards of this section.

18. *Co-location evaluation study.* An applicant's co-location study shall consist of a report that includes the following:

    a. Identification of other wireless communication sites within the search ring for the proposed wireless facility, based on the city's database or contact with other providers.

    b. Certification from a qualified radio engineer indicating whether the necessary service is technically feasible if provided by co-location on the other provider's site.

    c. A response from the owner/lessor of the site(s) identified by the other provider(s), who either agrees or disagrees to co-location on their property; and/or lease agreement.

    d. An evaluation of access and site area at the possible co-location site(s) identified.

19. *Aviation criteria.* Any proposed telecommunication device, structure or object shall be reviewed to ensure that it does not penetrate any of the airspace surfaces on or near a public or private airport; if such airspace is obstructed, the permit shall be denied. Special attention shall be given to the following:

    a. Approach surface. Land lying beneath the approach surface which extends outward uniformly to a width of 1,250 feet at a horizontal distance of 5,000 feet from the runway end.

    b. Transitional surface. The transitional surface begins at the runway end and on either side of the runway surface and slopes upward and outward at a 7:1 slope meeting the horizontal surface at 150 feet above the elevation of the airport.

    c. Horizontal Surface. The horizontal surface begins by swinging arcs of 5,000 feet from the center end of the runway surface creating an elongated oval above the runway. The height of the horizontal surface is 150 feet above the elevation of the airport.

    d. Conical Surface. The conical surface begins at the edge of the horizontal surface and extends upward and outward for a distance of 4,000 feet at a slope of 20:1 with an initial elevation of 150 feet above the airport elevation.

E. Temporary wireless communications facilities. Wireless communications facilities may be permitted as a temporary use with review by the Planning Official or his designate in order to facilitate continuity in wireless communications service during repair or maintenance of existing wireless communications facilities or for testing purposes prior to completion of construction of new wireless communications facilities. Temporary wireless communications facilities shall operate for not more than 60 days within a six-month period commencing when transmission from such facility begins. The wireless communications facility shall be removed within 30 days after the facility is no longer needed for telecommunications purposes. Such temporary permits shall be subject to the insurance and bonding requirements of subsection 20.450.075(D)(14) VMC.

F. Additional Development Standards by Zoning District.

1. *In Lower-density residential districts.* Wireless communications facilities in lower-density residential districts, (i.e., LS, MS, and MH) are regulated as follows:

    a. Lattice tower support structures, and new or replacement monopole support structures are prohibited.

    b. Antennae are prohibited on attached and detached single-family dwellings and on their accessory structures.

    c. Antennae and micro-cell facilities to be attached to nonresidential structures require a conditional use permit except when collocating on an existing wireless communications facility.

2. *In Higher-density residential and commercial districts.* Wireless communications facilities in higher-density districts, (i.e., MX, IC, IE, and RA) are regulated as follows:
    a. Lattice tower support structures and new monopole support structures are prohibited detached single-family dwellings, and require a conditional use permit on multi-family dwellings or non-residential uses. Replacement monopole on multi-family and non-residential uses are permitted
    b. Antennae are prohibited on attached and detached single-family dwellings or on their accessory structures.
    c. Antennae and micro-cell facilities to be attached to multi-family or nonresidential structures require a conditional use permit, except when collocating on an existing wireless communications facility.
3. *In Industrial districts (HI).* Wireless communications facilities in industrial districts are regulated as follows:
    a. Wireless communications facilities are permitted on industrial, commercial and multi-family residential uses in industrial districts. New lattice and monopole support structures, attached antennae and collocated antennae shall not be placed on attached or detached single-family uses or within the setback of the parent parcel on other uses unless the applicant demonstrates that such placement meets the standards of subsection 20.450.075(D) VMC.
    b. Monopole support structures are permitted on industrial, commercial and nonresidential uses within the industrial districts, if the criteria in subsection 20.450.075(D)(17) VMC for replacement are met. Replacement poles on single-family uses require a conditional use permit.
4. *In open space districts (PO and NA).* Wireless communications facilities in the open space districts, (i.e., GR and NA) are regulated as follows:
    a. Monopole support structures are permitted subject to the replacement standards of subsection 20.450.075(D)(17) VMC, except that replacement poles on attached or detached single- family, multi-family, and non-residential uses require a conditional use permit.
    b. Wireless communications support structures otherwise require a conditional use permit on residential and nonresidential uses within such districts.
    c. Antennae and micro-cell facilities must comply with the general development standards of subsection 20.450.075(D) VMC.

G. General Application Requirements and Conditions of Permit Issuance.

1. *Preapplication conference.* Preapplication conferences are required for all proposed wireless facilities except for co-located antennae proposed on existing support structures, pursuant to VMC 20.210.080.
2. *Preapplication conference application requirements.* In addition to the requirements of VMC 20.210.080 and the preapplication form provided by the community development department, the applicant shall submit a graphic representation of the search ring for wireless communication services proposed, and a narrative describing how the proposal complies with the development standards of 20.450.075(D) VMC.
3. *Permit application requirements.* In addition to the requirements of Chapter 20.210 VMC, the applicant shall, unless otherwise waived by the Planning Official or designate for good cause shown, provide the following:
    a. *Siting/co-location arrangements.* A copy of the applicant's co-location evaluation study, as required by VMC 20.450.075.(D)(18) or a valid agreement for co-location of the wireless communication facility on an existing building or support structure of another wireless services provider.
    b. *Visual impact simulation.* A graphic simulation of the proposed facility from not less than three perspectives, one of which shall be from ground level from any abutting residential property or the nearest public right-of-way.
    c. *Available sites map.* A map showing the service area of the proposed facility and a written explanation of the need for that facility, relative to existing facilities available within the search ring.
    d. A report from a qualified licensed engineer documenting:
        i. The anticipated capacity of the support structure, including the number and types of antennas which can be accommodated; at a minimum, the structure must be designed to accommodate at least two wireless antenna installations.
        ii. A projection of the wireless communication facilities within the coverage area of the facility proposed, that can be reasonably anticipated to be sited during the next five years.
        iii. A summary of findings that support the need for the facility at the location proposed.
        iv. The facility complies with all applicable standards of the FAA and FCC, including RF energy standard.
4. *Permit issuance.* Prior to the issuance of a building permit, the applicant shall provide the following:
    a. A copy of the applicant's license issued by the FCC.

b. A copy of the findings from the FAA's aeronautical study determination regarding the proposed support structure.

c. In the case of a leased site:

i. The applicant shall demonstrate that the lease agreement does not preclude the site owner from entering into leases of the site with other providers; and

ii. Completion of a land division, in accordance with the provisions of Chapter 20.320 and 20.330 VMC, governing land divisions and binding site plans and the state subdivision law, Chapter 58.17 RCW.

H. Conditional Use Approval Criteria.

1. *Application for new wireless site.* In the case of an application for use of a new site for wireless communications facilities, that all reasonable opportunities to co-locate the facility, or to locate the facility on an existing building or structure have been exhausted by the applicant and are not feasible.

2. *Application for lattice tower in parks or natural areas.* In the case of an application for a lattice tower in open space or natural area, that there is no feasible alternative to use of a lattice tower at the proposed site, or within the search ring for provision of wireless communications services.

3. *Application for new monopoles in PO or NA districts.* In the case of an application to locate a new monopole on Building Types with only one dwelling unit in these districts, that there is no feasible alternative to use of a lattice tower at the proposed site, or within the search ring for provision of wireless communications services.

4. *Application for new monopoles in MX, RA, IC, IE, PO, NA districts.* In the case of an application to locate a new monopole on Building Types with more than one dwelling unit in these districts, that there is no feasible alternative to use of a lattice tower at the proposed site, or within the search ring for provision of wireless communications services.

5. *Application for antenna in PO and NA districts.* In the case of an application to locate an antenna on a Building Types with more than one dwelling unit in these districts, that there is no feasible alternative to use of a lattice tower at the proposed site, or within the search ring for provision of wireless communications services.

6. *Application for antenna in LS and MS.* In the case of an application to locate an antenna on a Building Types with any non-residential uses in these districts, that there is no feasible alternative to use of a lattice tower at the proposed site, or within the search ring for provision of wireless communications services.

7. *Application for wireless facility exceeding one hundred (100') in height*. If the wireless facility proposed would be in excess of 100 feet in height, that a structure of lesser height or another location at higher elevation is not feasible.
8. Visual impact mitigation.
    a. That visual impacts have been mitigated to the greatest extent possible by using camouflage or screening, including but not limited to: fencing, landscaping, strategic placement adjacent to existing buildings or existing vegetation, placing accessory equipment structures underground, incorporating facilities into the architectural features of existing buildings or structures. Mitigation may also include design compatibility with key elements in the surrounding area, such as use of brick or other material similar to that used in adjacent buildings or structures; visually blending support structures with compatible architectural features such as flag poles, bell towers or cornices; or using existing vegetation to camouflage support structures.
    b. That the location for a wireless communication facility has been chosen so as to minimize the visibility of the facility to residentially-zoned land, and to minimize the obstruction of scenic views from residentially-zoned land.

I. Permit Limitations/Expiration.

1. *Expiration of permits.* Any permit for a wireless communication support structure shall expire if all providers using a support structure cease using it for wireless communications systems for more than 12 continuous months.
2. *Period of review.* Any permit for a wireless communications support structure issued pursuant to this ordinance shall be reviewed after 10 years from effective date of the permit approval. Such review shall be initiated by the applicant within 30 days of the 10-year period, and completed by the city within the timelines established for ministerial review of land use permits. The wireless communications facility shall be reviewed for compliance with the ordinance in effect at the time of review, and in particular, to determine if opportunities for replacement with "stealth" technology or micro-cell antennae are technologically feasible. If stealth or micro-cell antennae are feasible for the site, then these antennae shall be utilized as a replacement, and the existing support structure removed.

J. Federal Requirements.

1. *Compliance with federal regulations and penalties.* All wireless communications support structures must meet or exceed current standards and regulations of the FAA, the FCC and any other agency of the federal government with the authority to regulate wireless communications support structures and antennae. If such standards and regulations are changed, owners of the wireless communication support structure, antennae and electronic equipment governed by this ordinance shall bring such wireless communication support structure, antennae and electronic equipment into compliance with such revised standards and regulations within the compliance schedule of the federal agency. Failure to bring wireless communications support structures and antennae into compliance with such revised standards and regulations shall constitute grounds for the removal of the wireless communication support structure, antenna or electronic equipment at the owner's expense.

2. *Required environmental assessment.* The owners of such wireless communications support structures, antennae and electronic equipment shall provide the city with copies of all environmental assessments (EAs) required to be submitted to the FCC or FAA regarding locations within the city simultaneously with any filing with the federal agencies pursuant to 47 CFR Part I.

K. Removal of Antennas and Support Structures. Criteria for antenna removal. Any antenna or wireless communications support structure that is not operated for wireless communications for a continuous period of 12 months, shall be removed by the owner of the property on which the support structure or antenna is situated, or by the owner or lessee of the support structure or antenna within 90 days of receipt of notice to remove from the city. If the antenna and/or support structure is not removed within said 90 days, the city may remove the antenna or support structure at the owner's expense. If there are two or more wireless communications providers collocated on a single support structure, this provision shall not become effective until all providers cease using the wireless communication facility for a continuous period of 12 months.

L. Periodic Review. Reasons for periodic review. The city recognizes that communication technologies are subject to rapid change. Future innovations may result in reducing the impacts of individual facilities and render specific portions of this ordinance obsolete. Periodic review and revision of this ordinance shall occur at least every five years thereafter or more frequently at the request of the Planning Commission, City Council or the City Manager.

M. Summary Table. Summary of wireless communication facility regulations. The table below is a summary of the regulation of wireless communications facilities in the zoning districts, as authorized in Section 20.450.070 VMC. In the event of a discrepancy between the table and the ordinance language of this chapter, the ordinance language shall control.

TABLE 20.450.075-1WIRELESS SUMMARY TABLE

P – Permitted (subject to development standards) / C – Conditional Use / X – Prohibited											
	Existing[5]	Monopole (New) On				Replace with Monopole[1, 2]		Attached Antenna On			Height
Zone District	On Any Existing, Legally-Established Wireless Support Structure	Lattice Tower	BT with Only One (1) Dwelling Unit	BT with More Than One (1) Dwelling Unit	BT with Any Non-Residential Uses	More Than One (1) Dwelling Unit	BT with Any Non-Residential Uses	BT with Only One (1) Dwelling Unit	BT with More Than One (1) Dwelling Unit	BT with Any Non-Residential Uses	Maximum Height in Feet[4]
LS	P	X	X	X	X	X	X	X	P	C	-
MS	P	X	X	X	X	X	X	X	P	C	35
MX	P	X	X	C	C	P	P	X	P	P[3]	50
RA	P	X	X	C	C	P	P	X	P	P[3]	65
IC	P	X	X	C	P	P	P	X	P	P[3]	72
IE	P	X	X	C	P	P	P	X	P	P	72
HI	P	P	X	P	P	P	P	X	P	P	72

P – Permitted (subject to development standards) / C – Conditional Use / X – Prohibited											
	Existing[5]	Monopole (New) On				Replace with Monopole[1, 2]		Attached Antenna On			Height
MH	P	X	X	X	X	X	X	X	X	X	-
PO	P	C	C	C	C	P	P	X	C	P[3]	72
NA	P	C	C	C	C	P	P	X	C	P[3]	72

1 Replacement of an existing pole, light standard, telecommunications pole or other pole-like structure by a monopole of the same or height increase of no more than ten (10%) percent, and not more than twice the same circumference of the pole being replaced. (20.430.104.13.B.1.i.2 VMC).

2 Per FCC-CIRC2006-03 (6409(a)), modification on a tower by more than ten (10%) percent or by the height of one (1) additional antenna array with separation from the nearest existing antenna not to exceed twenty (20') feet, whichever is greater is permitted on all existing towers.

3 See VMC 20.510 Heritage Overlay District for additional requirements.

4 Per FCC-CIRC2006-03 (6409(a)), All new support structures over one hundred (100') feet in height require a conditional use permit. A conditional use permit is not required for height increases of ten (10%) percent or less.

20.450.080 Cottage Cluster Dwelling

A. The following standards apply:

1. Size Limitations on Units. Single-family may not exceed sixteen hundred (1,600) square feet and each duplex three thousand (3,000) square feet. Floor areas of attached or detached rear garages and outbuildings shall count towards these size limits, with the exception of the first two hundred (200) square feet of rear garage or outbuilding per single-family, or four hundred (400) square feet per duplex.
2. Shared Common Open Space. Shared common space with shared amenities that amounts to at least two-hundred (200) square feet per unit must be provided.
3. Proximity to Shared Common Space. At least seventy-five (75%) percent of the units must be located within twenty-five (25') feet of the shared common open space. The planning official may at their discretion grant exceptions as needed to this requirement in the cases of very narrow or unusually configured lots.
4. Covered Porches and Roofs. Covered porches, when provided, must be at least sixty (60) square feet, with no dimension less than five (5') feet. Any roof higher than eighteen (18') must be pitched at a ratio of at least 6:12.
5. Community Buildings. May include up to one (1) community building with a maximum floor area of twelve hundred (1,200) square feet for the shared use of residents that provide space for accessory uses such as community meeting rooms, guest housing, exercise rooms, day care, community eating areas, community gardens, or picnic shelters.
6. Allowable Unit Types and Uses.
    a. General uses. Uses are limited to attached and detached single-family homes and associated outbuildings, public or private open space, and parking areas.
    b. Home occupations. Home occupations as part of this building type pursuant to Section 20.430.100 Accessory Use Types, Structures, and Standards - Home Occupations are permitted only if there are no employees residing off site
    c. Accessory Dwelling Units. ADUs pursuant to this chapter of this code are permitted only if located entirely within the single-family homes.

B. Additional approvals, policies, or submittals. The following apply:

1. Access Plan. An access plan for solid waste and recycling collection service to all dwellings in the development shall be submitted with the application. The access and collection plan shall show either a designated collection point for each lot or a common solid waste storage area for use by all lots and the ability of collection vehicles to maneuver safely to all points of collection. All circulation and turnaround designs must meet the requirements of Chapter 11.80.070 VMC and the Transportation Standard Details and be feasible using city-provided solid waste truck turning modeling templates and truck specifications. Collection vehicles shall be able to circulate the development and service receptacles with minimal backing required.

2. Review process. Cottage cluster housing projects shall be reviewed under Chapter 20.320 VMC, Subdivisions, where individual lots are proposed to be owned separately, or as a Type II review subject to Chapter 20.270 VMC Site Plan Review, where common ownership of lots is proposed.

20.450.085 Manufactured Home Development

A. *Purpose.* The purpose of this chapter is to establish criteria for the placement of manufactured and modular homes in developments within the city in a manner that encourages housing options and protects the integrity of existing neighborhoods.

B. *Applicability.* Manufactured Home Developments established prior to the effective date of this ordinance are exempt from the development standards of Chapter 20.400 VMC and may continue to exist and expand within existing boundaries subject to the development standards of this chapter.

C. The following standards apply:

1. *Setbacks.* No manufactured home, or accessory thereto, shall be located any closer than 10 feet from the property line abutting on a public street or road, 5 feet from all other property lines and 5 feet from any such areas as a street, a common parking area, or a common walkway.

2. *Walkways.* Walkways of not less than 3 feet in width shall be provided from each manufactured home site to any service building, recreation area, and parking area.

3. *Buffering.* Buffering or screening is required to make the manufactured home development compatible with its adjacent surrounding uses. Buffering shall be a sight-obscuring fence, masonry wall, evergreen hedge or other suitable planting. Evergreen planting shall not be less than 5 feet in height and shall be maintained in a healthy living condition for the life of the manufactured home development.

4. *Landscaping.* A manufactured home development shall be landscaped in compliance with the requirements in Section 20.450.035 VMC, Landscaping and Tree Conservation.

5. *Recreational Areas.* A recreational area shall be a contiguous, improved area, and be suitably maintained for recreational purposes. The recreational area shall contain a minimum of 200 square feet of space per mobile home unit. It may contain a mix of landscaping, lawn area, pedestrian paths, and/or paved courtyard area, and recreational amenities. Impervious elements shall not exceed 50 percent of the total recreation area.
6. *Accessory Structures.* Accessory structures supporting the primary residential use, including community buildings, recreational facilities, and commercial uses, shall be permitted outright.
7. *Expansion.* The following criteria must be taken into consideration in the expansion of existing manufactured home developments.
    a. *Additional Dwelling Units.*
        i. The addition of a manufactured or modular home to an existing manufactured home park development is permitted outright.
        ii. The addition of other residential building types is permitted provided the unit is restricted to households earning no more than 60 percent of Area Median Income (AMI). Affordability shall be secured through a recorded covenant or similar ensuring permanent compliance with the affordability requirement. The new residential building type must be permitted within the MH zoning district.
    b. Adequate buffering or screening shall be required when such developments are adjacent to commercial and manufacturing zones.
    c. Expansions within the approved manufactured home development boundaries shall provide extensions of future streets as required by the comprehensive plan.
8. *Repair and Replacement.* The repair or replacement of existing manufactured homes within an existing manufactured home park development shall be allowed as provided in this section.
    a. *Repair of existing units.* The repair or rehabilitation of an existing manufactured or modular home shall be permitted outright.
    b. *Replacement of existing units*.
        i. The replacement of an existing manufactured or modular home with a new manufactured or modular home is permitted outright.
        ii. The replacement of an existing manufactured or modular home with another residential building type is permitted provided the replacement unit is restricted to households earning no more than 60 percent of Area Median Income (AMI). Affordability shall be secured through a recorded covenant or similar ensuring permanent compliance with the affordability requirement. The replacement residential building type must be permitted within the MH zoning district.

c. *Development Standards.* Replacement and additional units shall comply with all applicable development standards of the underlying zoning district and building type.

9. *Redevelopment.* Redevelopment of an existing park to another residential use shall be permitted outright when all the following standards are met:

   a. *Affordability Requirement*. All new dwelling units within the redevelopment shall be restricted to households earning no more than 60 percent of Area Median Income (AMI).

   b. *Affordability Covenant.* Affordability shall be secured through a recorded covenant or similar ensuring permanent compliance with the affordability requirement.

   c. *Development Standards.* The redevelopment shall comply with all applicable development standards of the underlying zoning district and building type.

10. *Use Exception.* A property owner within the Manufactured Home Development District (MH) zoning district may seek to rezone the property pursuant to the procedures set forth in Chapter VMC 20.285. The applicant must demonstrate that:

    a. The existing MH zoning district does not allow for reasonable use of the property; or

    b. The uses permitted in the MH zoning district are not economically viable due to the property's location, site conditions, or surrounding development.

11. Performance Bond. The Planning Official may require the posting of a bond or other assurance to ensure that all roadways, electrical work, plumbing, landscaping and other improvements required as a condition(s) of approval are constructed to the appropriate standard within the appropriate time frame, as governed by Section 20.450.010 VMC, Escrow and Assurances.

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20.500
OVERLAY DISTRICTS

Sections:

20.510 Active Ground Floor Use.

20.520 Active Ground Floor Ready.

20.530 Station Areas.

20.540 Industrial Holding.

20.550 Heritage Overlay District.

20.560 Noise Impact Overlay District.

20.570 Airport Height Overlay District.

CHAPTER 20.510
ACTIVE GROUND FLOOR USE

Sections:

20.510.010 Purpose.

20.510.020 Establishment of Boundaries.

20.510.030 Applicability.

20.510.040 Development Regulations.

20.510.010 Purpose.

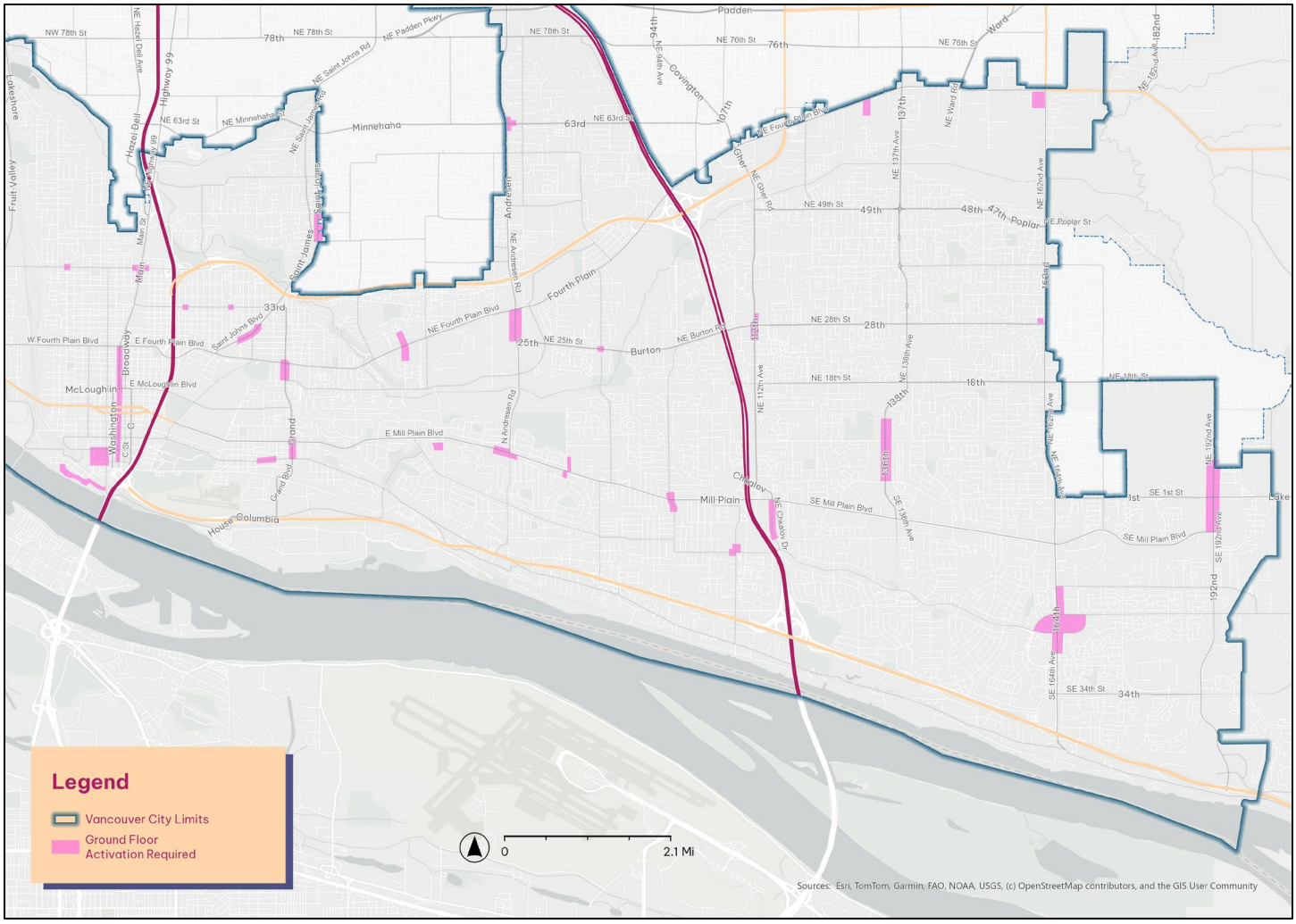
A. *Purpose*. This chapter establishes standards for the Active Ground Floor Use Required Overlay, ensuring that new development contributes to achieving the goals for the City's Comprehensive Plan, particularly for connected and accessible neighborhoods.

B. This chapter is not intended to prevent continued use, repair or expansion of lawfully existing buildings, or to render otherwise lawful development as nonconforming.

20.510.020 Establishment of Boundaries.

Establishment of Boundaries. The overlay is defined as illustrated in Figure 20.510.020-1.

FIGURE 20.510.020-1. ACTIVE GROUND FLOOR USE OVERLAY



20.510.030 Applicability.

General. All new buildings located along street frontages within the Active Ground Floor Use overlay are subject to the regulations of this Chapter.

A. *Exceptions*. Emergency services, as defined in Chapter 20.160 VMC, shall be considered exempt from this Chapter.

20.510.040 Development Regulations.

Overlay Requirements. Development regulations for new buildings are subject to the Overlay Requirements for the identified Building Type or Building Types in Chapter VMC 20.420 Building Types, in particular Section 6.1 Ground Floor Activation.

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CHAPTER 20.520
ACTIVE GROUND FLOOR USE READY

Sections:

20.520.010 Purpose.

20.520.020 Establishment of Boundaries.

20.520.030 Applicability.

20.520.040 Development Regulations.

20.520.010 Purpose.

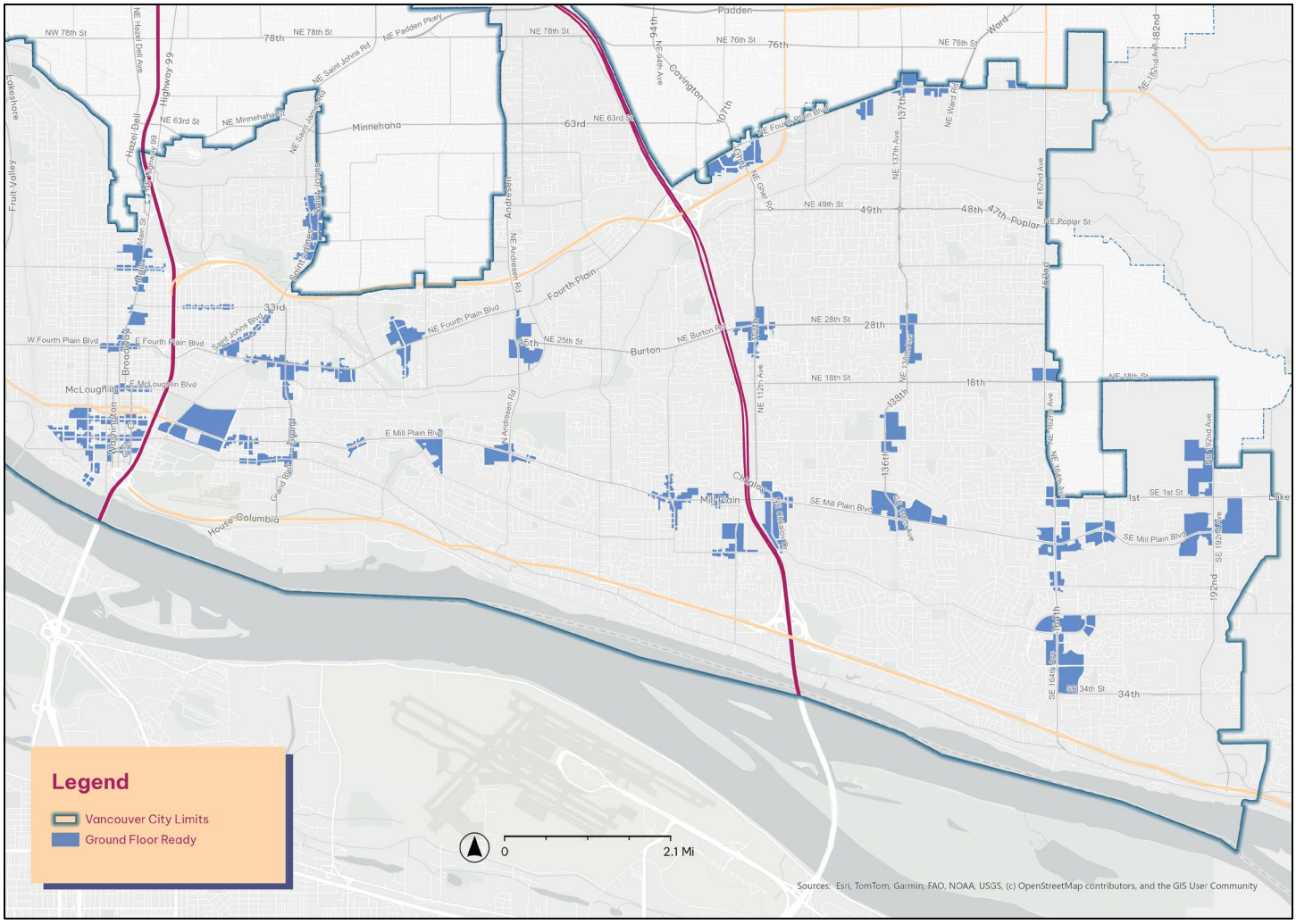
A. *Purpose*: This chapter establishes standards for the Active Ground Floor Use Ready Overlay, ensuring that new development in areas where active ground floor uses are not currently feasible can be converted to commercial uses in the future and contribute to the development of connected and accessible neighborhoods.

B. This chapter is not intended to prevent continued use, repair or expansion of lawfully existing buildings, or to render otherwise lawful development as nonconforming.

20.520.020 Establishment of Boundaries.

Establishment of Boundaries. The overlay is defined as illustrated in Figure 20.520.020-1.

FIGURE 20.520.020-1: ACTIVE GROUND FLOOR READY OVERLAY



20.520.030 Applicability.

General. All new buildings located along street frontages within the Active Ground Floor Use Ready overlay are subject to the regulations of this Chapter.

20.520.040 Development Regulations.

Overlay Requirements. Development regulations for new buildings are subject to the Overlay Requirements for the identified Building Type or Building Types in Chapter VMC 20.420 Building Types, in particular Section 6.2 Ground Floor Ready.

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CHAPTER 20.530
STATION AREAS

Sections:

20.530.010 Purpose.

20.530.020 Establishment of Boundaries.

20.530.030 Applicability.

20.530.040 Development Regulations.

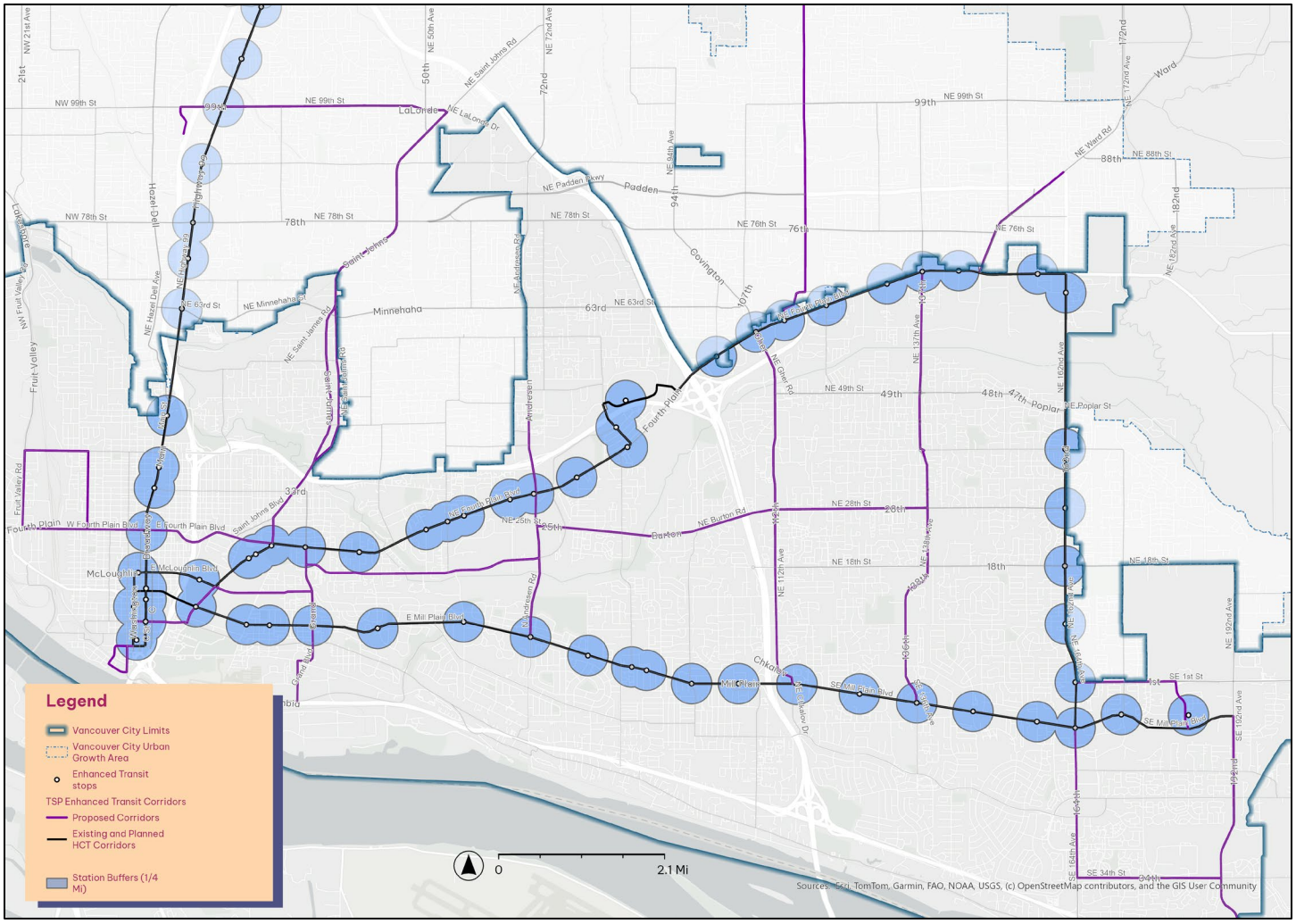
20.530.010 Purpose.

Purpose: This chapter establishes standards for major transit stops, to ensure that existing investments in transit and intermodal infrastructure are leveraged to implement the City's commitment to affordable and accessible housing and vibrant, walkable neighborhoods that improve health, wellness and expand multimodal transportation options.

20.530.020 Establishment of Boundaries.

Establishment of Boundaries. The overlay is defined as illustrated in Figure 20.530.020-1.

FIGURE 20.530.020-1: STATION AREAS OVERLAY



20.530.030 Applicability.

General. All new buildings located within the Station Areas overlay are subject to the regulations of this Chapter.

20.530.040 Development Regulations.

A. Height. No maximum building height of buildings within the Station Areas overlay regardless of maximum height within the base district. Maximum heights are released in the Overlay Requirements for the identified Building Type or Building Types in Chapter VMC 20.420 Building Types, in particular Section 6.3 Transit-Based Height Allowance.

B. *Surface parking lots.* All proposed new surface parking lots shall be accompanied with redevelopment plans showing how future development can be accommodated to replace the surface parking lots.

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CHAPTER 20.540
INDUSTRIAL HOLDING

Sections:

20.540.010 Purpose.

20.540.020 Establishment of Boundaries.

20.540.030 Applicability.

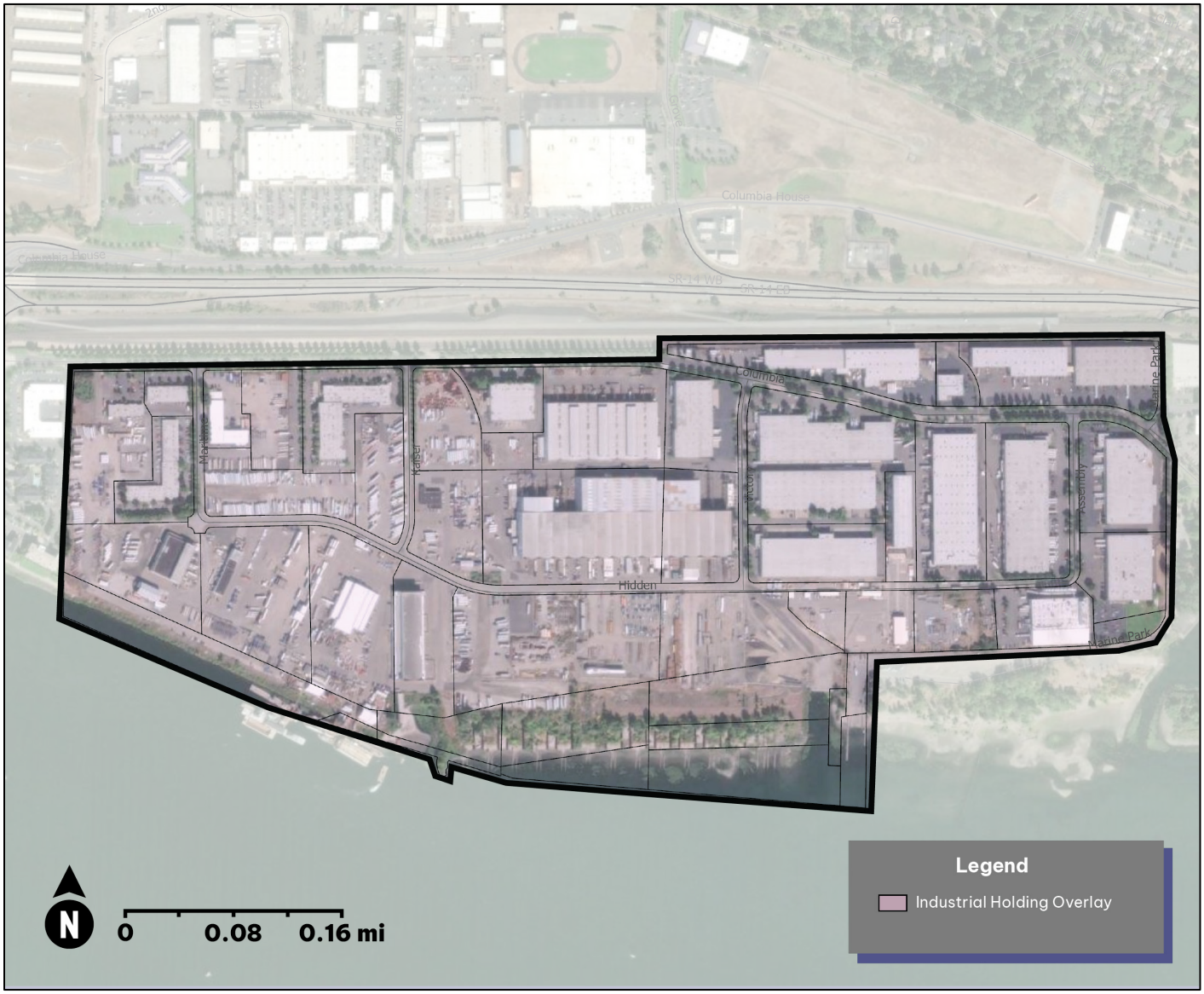
20.540.010 Purpose.

Purpose: This chapter establishes standards for maintaining conformity for heavy industrial uses located in Columbia Business Center until such time as master plans are approved and established for these areas that allow conversion to the underlying base district.

20.540.020 Establishment of Boundaries.

Establishment of Boundaries. The overlay is defined as illustrated in Figure 20.540.020-1.

FIGURE 20.540.020-1: INDUSTRIAL HOLDING OVERLAY



20.540.030 Applicability.

General. Development within the Industrial Holding overlay shall be subject to the Heavy Industrial (HI) development standards until such time as the City and property owners agree to remove the Industrial Holding overlay and allow for development under the Regional Activity Center (RA) base zoning district.

Removal of the HI overlay shall be via adoption of a master plan pursuant to VMC 20.260.

Such master plan shall specify the timing and conditions under which the Industrial Holding overlay will be removed to allow for phased development consistent with the approved master plan.

Due to the unique character and combination of uses in the Columbia Business Center area, uses existing prior to June 1, 2026, on parcels with the Industrial Holding overlay in the Columbia Business Center may be altered, expanded or replaced regardless of use limitations in Table 20.430.050.

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CHAPTER 20.550
HERITAGE OVERLAY DISTRICT

Sections:

20.550.010 Purpose.

20.550.020 Heritage Overlay District Number One – Standards and Guidelines.

20.550.030 Review Process.

20.550.040 Determination of Compliance.

20.550.050 Preservation, Restoration, and Reuse.

20.550.060 Identification Plaque.

20.550.070 Historic Reserve District.

20.550.010 Purpose.

General. The Heritage Overlay Districts are intended to preserve the special architectural character and/or historic or cultural significance of certain areas within the City. The following additional regulations are imposed in areas so designated in order to do the following:

A. *Compatibility.* To ensure that new development is compatible in scale, character, and design with existing buildings and with the preservation of existing architectural characteristics of significant buildings in the area.

B. *Preservation.* To preserve and encourage the restoration of existing older buildings in their original architectural style.

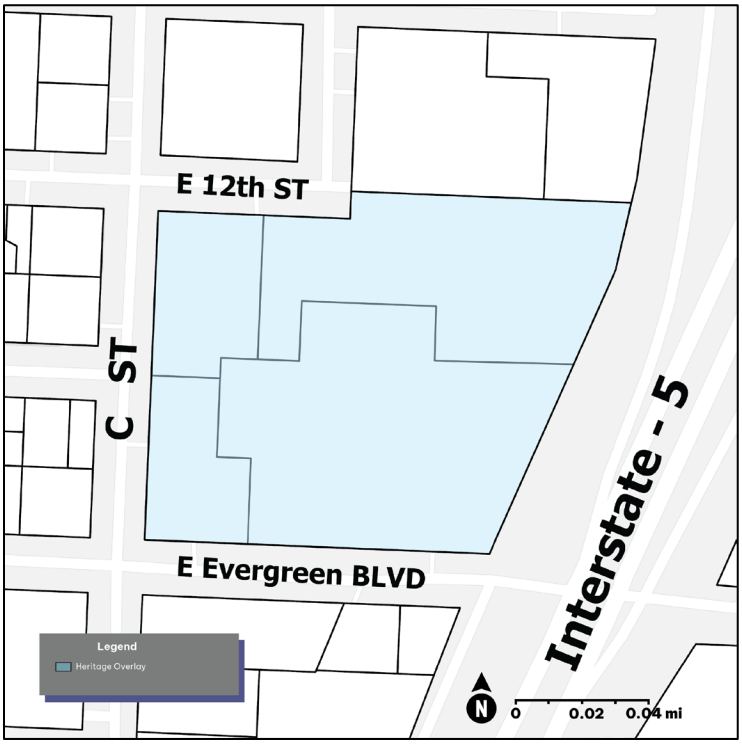
C. *Retention of unique character*. To retain, conserve, and improve historical, cultural, and architectural environments attractive to residents and to visitors, thereby promoting the economic health of the City while retaining its unique historical and architectural features.

20.550.020 Heritage Overlay Districts - Downtown – Standards and Guidelines.

A. Heritage Overlay District Number One.

1. *Establishment.* Heritage Overlay District Number One shall be bounded by 12th Street, West Reserve Street, the north curb line of East Evergreen Boulevard, and C Street; Figure 20.510.020-1. This is primarily the site of Providence Academy, the dominant landmark and most important historic building in downtown Vancouver. The main Academy building is the major historic asset in the area, but the outbuildings and the grounds of the Academy are also important historical and architectural features because of their relationship to the main building, and their influence on views of the main building and on the character of the immediate environs.

FIGURE 20.550.020-1. HERITAGE OVERLAY DISTRICT NUMBER ONE MAP

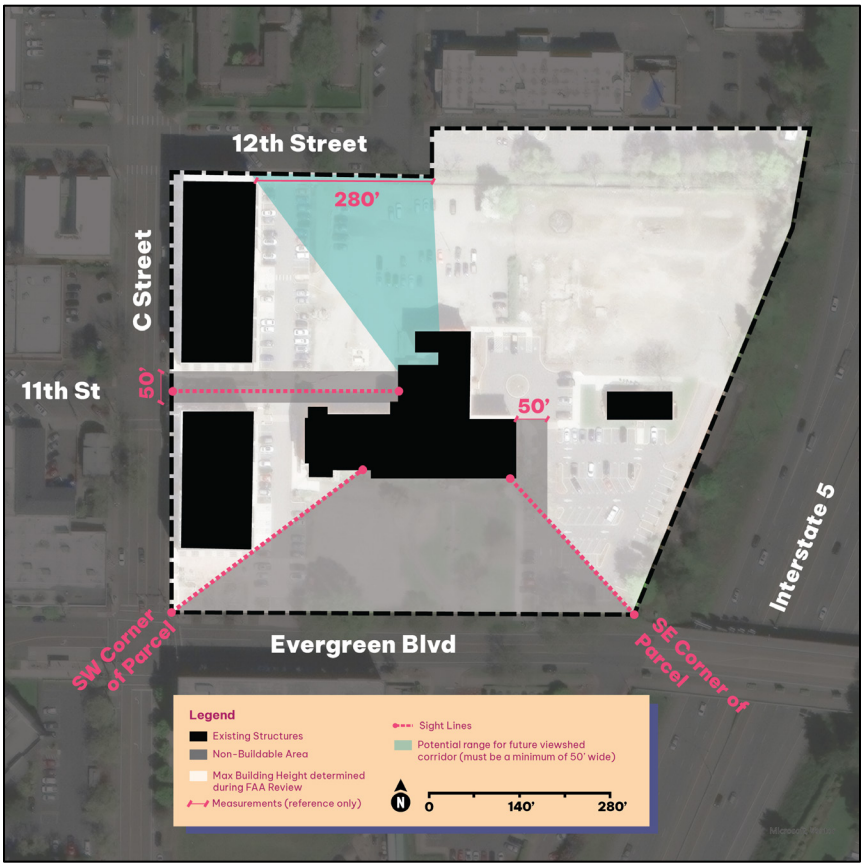


2. *Policy.* Due to the importance of the site of Providence Academy, the Academy buildings, and the Academy grounds to the cultural, economic, and architectural history of Vancouver, and due to the unique character established by the buildings and grounds in combination with each other and with their surroundings, it is the policy of the city to preserve Providence Academy and critical open spaces integral to its site, and to ensure the compatibility of new construction or alterations to existing buildings, with the character of the historical buildings on the site. In order to accomplish this policy, special regulations are deemed necessary as an exercise of the city's legislative and police powers for the preservation and enhancement of the area.

3. *Standards and requirements.* The following requirements shall apply within Heritage Overlay District Number One, in addition to any other Zoning Ordinance regulations applicable to the area. The regulations are necessary to preserve the unique open space which provides a setting for and which is an integral part of the Providence Academy site, and to preserve views of the Academy from the East Evergreen Boulevard entrance to the downtown area.

   a. Construction shall not be allowed in the identified non-buildable areas shown and described in Figure 20.550.020-2.

FIGURE 20.550.020-2. HERITAGE OVERLAY DISTRICT NUMBER ONE NON-BUILDABLE AREAS



   b. A non-buildable view corridor of 50 feet in width from approximately 11th Street looking east to the Main Academy building shall be preserved. In addition, there shall be one or two non-buildable view corridors looking south from 12th Street into the Academy site which shall be a cumulative total of 50 feet in width.

   c. All new construction shall be similar in materials and texture to that of the main Academy building, and shall be primarily composed of brick facing, similar in color to that of the main building.

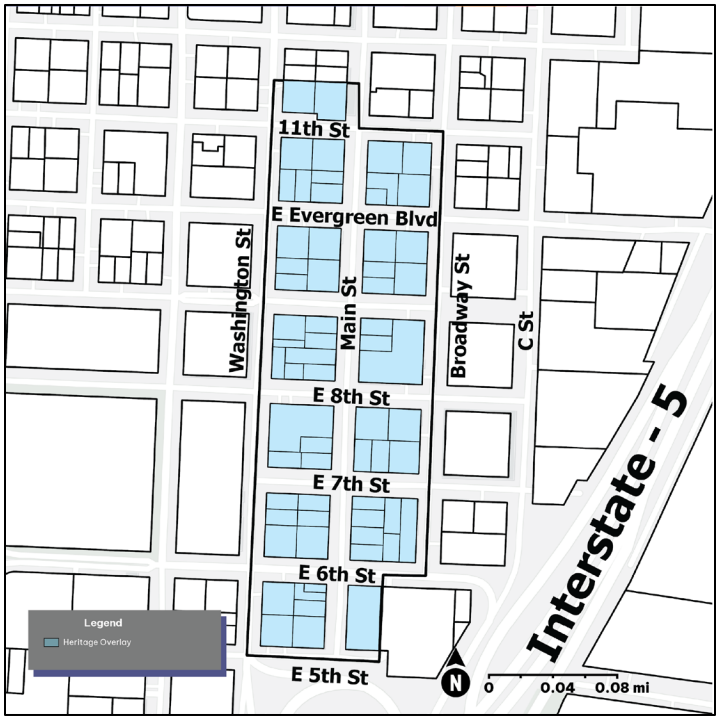
d. No sign shall be installed on the main Academy building above the first story. Free-standing signs on the property shall be limited to directional signs and necessary for parking and traffic control, and a limited number of signs advertising businesses on the premises containing an aggregate signage area of not more than 100 sq ft. No sign or sign structure shall be more than 10 feet in height above the ground level.

e. New construction shall minimize the removal of existing, mature trees exceeding 30 feet in height, and such construction shall be so located and designed as to preserve views of the main Academy building from East Evergreen Boulevard between the freeway and C Street, and shall preserve a setback from East Evergreen Boulevard of not less than 15 feet for open space and substantial planting, and such setback area shall not be used for parking.

B. Heritage Overlay District Number Two.

1. *Establishment.* Heritage Overlay District Number Two shall consist of the area depicted in Figure 20.550.020-3. The area contains a concentration of older buildings either entirely preserved in the architectural style of the early 1900's, or having significant key remaining characteristics of such style, and which are capable of restoration to their original character. Although there are few buildings of historical or architectural significance, the concentration of several older buildings and remaining parts of older buildings in the area collectively provide a street facade reminiscent and characteristic of turn-of-the-century downtown Vancouver, and provides both a historical asset and the potential to recreate the original character of lower Main as a cultural and economic asset.

FIGURE 20.550.020-3. HERITAGE OVERLAY DISTRICT NUMBER TWO MAP



2. *Policy.* It is the policy of the city to ensure the preservation of important street frontages representative of downtown Vancouver at an earlier time, to encourage the restoration of the facades of older buildings to their original character, to enhance and expand the economic, cultural, and architectural attraction of the area, and to coordinate the actions of individual property owners to the benefit of all property owners. In order to accomplish this policy, the regulations set forth in this chapter are deemed necessary to preservation and enhancement of the area.

3. *Key buildings.* Parts or all of the following key buildings in Heritage Overlay District Number Two illustrate one or more of the features identified in the previous Section. These buildings should be restored as much as possible to their original appearance, where it has been altered, and these should be used as guidance in the alteration or new construction of adjacent and nearby buildings.

    a. The Ford Building, 601 Main Street.

    b. Donnegan's, 614 Main Street

    c. C & C Department Store Building, 715 Main Street

    d. Vancouver National Bank Building, 518 Main Street.

4. *Exterior alteration and new construction guidelines.* The Vancouver Downtown Design Guidelines shall be adhered to in the construction of new buildings and alterations to all existing buildings in Heritage Overlay District Number Two.

C. Relation to VMC 17.39. The provisions of VMC 17.39 shall apply to the Heritage Overlay Districts, except in the case of a conflict, in which case the provisions of VMC 20.550 shall apply.

20.550.030 Review Process.

A. *New construction.* All new construction within a Heritage Overlay District shall require review by the Planning Official. The standards for such review shall be those applicable to the specific Heritage Overlay District the property is located within and the Vancouver Downtown Design Guidelines.

B. *Exterior Alterations.* All exterior alterations, to buildings listed on the Clark County Heritage Register, visible from a public street or other public place, including changes to signs, murals, marquees, awnings, canopies or other building appendages whether a building permit is required or not, requires advisory review by the Planning Official and a final decision by the Historic Preservation Commission. Exterior alterations to buildings listed on the State or National Registers of Historic Places whether a building permit is required or not, and visible from a public street or other public place, shall require an advisory review by the Historic Preservation Commission and a final decision by the Planning Official. All other exterior alterations to buildings within the Heritage Overlay, whether a building permit is required or not, visible from a public street or other public place, shall require a review by the Planning Official. The standards for such review shall be those applicable to the specific Heritage Overlay District the property is located within, the Vancouver Downtown Design Guidelines and the standards for historic preservation projects which appear as Title 36, C.F.R., Part 67 of the Federal Register and shall consult with the Planning Official on any exterior alterations to a historic building within Heritage Overlay District.

C. *Permission for removal of a registered building.* No building located within a designated Heritage Overlay District which is of special historical interest or value, as indicated by its having been listed on the National Register of Historic Places, the Washington Heritage Register or the Clark County Heritage Register of Historic Places or identified as an "eligible building" for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Site and Buildings, shall be torn down, demolished, or removed unless such building is or has become so dilapidated or damaged, whether from damage by fire or other elements or from natural deterioration, that it is unusable and cannot be reasonably repaired or restored; provided, that such a building may be relocated to another site within the Heritage Overlay District with the approval of the Historic Preservation Commission; provided, further that such a building may be relocated outside of a historic preservation overlay district after review and recommendation from the Clark County Historic Preservation Commission and approval of the City Council.

D. *Conditional uses.* The Hearing Examiner may authorize a use or uses of an existing building in a designated Heritage Overlay District not otherwise permitted within the regular use district with which the downtown development and Heritage Overlay District is combined as a conditional exception, in the same manner as for conditional exceptions regularly permitted; provided that:

1. The Hearing Examiner finds that allowing such use is necessary to the preservation and/or restoration of an existing building of historical or architectural merit (although not necessarily a designated historical building or structure).

2. Such use would not be detrimental to other regularly permitted uses in the district or to the historical or architectural character of the building.

3. The Hearing Examiner has received such assurances as it deems satisfactory (which may include covenants or conditions attached to its approval of a conditional exception), that allowing such use will ensure preservation and/or restoration of the building or key features of the building.

4. The Hearing Examiner is authorized to waive ordinances relating to setback distances or encroachment distances on public rights-of-way or parking requirements, or other requirements in the event the same are found by it to be necessary and reasonable for the development of any property so as to conform with the provisions of this Section. The Building Official pursuant to Chapter 11, Laws of 1976, may allow repairs, alterations, and/or additions necessary for preservation, rehabilitation, or continued use of a building which has been designated as a historic structure under this chapter without conformance to all city codes; provided, he/she shall do so only if he/she finds in writing that the repaired or altered building will be less hazardous, based on life and fire risk, than the existing building.

20.550.040 Determination of Compliance.

A. *General.* Determination as to whether a proposed alteration to the exterior of a building, or the design of a new building in a designated historic zone, meets the intent, purposes, and requirements of this chapter, shall be made by the Planning Official. Demolition permits for buildings listed on the Clark County Heritage Register, State Heritage Register or National Register of Historic Register are subject to approval by the Clark County Historic Preservation Commission, subject to appeal to the City Council, as provided herein.

20.550.050 Preservation, Restoration, and Reuse.

A. *General provisions for registered structures.* Any structure which has been included within a Historic Preservation Overlay District, and which is listed on the Clark County Heritage Register, State Heritage Register, or National Registers of Historic Places or identified as an “eligible building” for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings, shall be subject to the following regulatory provisions hereby adopted to encourage preservation, restoration and reuse of historic structures:

1. Building Code Regulations applicable to the preservation, restoration and reuse of historic buildings and structures are contained in VMC 17. VMC 17.08 provides for the Building Official to approve alternate methods of construction and materials. Documents that the Building Official uses to make determinations on alternate methods and materials for the preservation, restoration and related reconstruction, rehabilitation, strengthening or relocation of buildings or structures designated as historic buildings include but are not limited to the State Building Code(s) designated in RCW 19.27, VMC 17, the Washington State Historic Building Code WAC 51-19, the International Existing Building Code and other technical resources related to historic buildings and structures.

2. Any developer may transfer the unused development potential of a historic building site to any other site in the same zoning district provided that such transfer would not create a hazard to low flying aircraft. The unused development potential shall be computed in terms of allowable floor area and building height for a site the same size as that on which the historic structure is located, minus the area in the historic building. This transfer of development potential is divisible and may be used only once. The owner of such property must have first recorded a covenant approved by City Council, being on all successor owners, heirs and assigns, that the historic building will be maintained in its historic condition in consideration of the special rights granted by this Section.
3. A structure as identified above shall not be demolished except in the following manner:
    a. *Demolition of Unsafe Buildings.* If the City Building Official has found the structure to be unsafe under the provisions of Chapter 17.32 VMC, Unfit Buildings and Premises Code, and has ordered that the structure be demolished. No review is required by the Clark County Historic Preservation Commission.
    b. *Demolition of Other Buildings in a Heritage Overlay District.* If a proposed reuse of the site requires the demolition of a structure listed on the Clark County Heritage Register, State Heritage Register, or National Register of Historic Places or identified as an "eligible building" for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings, and such structure is located within a Historic Preservation Overlay District. The proponent of the demolition shall submit an Application for Demolition together with a report demonstrating that preservation of the building or structure and important features thereof proposed for demolition will impose an economic hardship upon the owner, rendering it impractical to renovate, restore, or reuse the structure. The report shall contain the following information:
        i. Ownership history during the past ten years including the buyers and sellers, sales prices, dates of sales and the relationships, if any, between the present owner(s) and the most recent previous owner(s).
        ii. The outstanding balance of the mortgage and other financing secured by the property.
        iii. The most recent assessed value and present property taxes levied.
        iv. All appraisals on the property performed during the past three years and an estimate of the property's present fair market value.
        v. A summary of listed prices, if any, for the property during the most recent three years.
        vi. Cultural significance as described in nominations for listing in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places or in any consultant report determining that the building may be an "eligible building" for future listing on the

Clark County Heritage Register, State Heritage Register or National Register of Historic Places.

vii. Professional quality as-built drawings of the building and renderings of all exterior elevations showing the building's architectural features and black and white photographs on acid free photographic paper of the building interior and exterior, its site and adjacent structures.

viii. Current level of economic return including annual gross income, itemized operating and maintenance expenses, capital expenditures, depreciation and debt service for the most recent three full years.

ix. An analysis of reasonable economic alternatives to demolition, including:

(A). redevelopment of the building in its present location independent of other development of the site;

(B). redevelopment of the building in its present location in conjunction with new development on the balance of the site;

(C). and relocation to a different location and whether such redeveloped or relocated alternatives are capable of providing reasonable economic return upon completion of renovation / repair / relocation activities.

c. *Procedures for Processing Applications for Demolition.* Applications for Demolition shall be processed as follows:

B. For buildings listed in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places or identified as an "eligible building" for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings and located within a Historic Preservation Overlay District a legal notice shall be published in the local newspaper that a completed application for demolition has been accepted by the Planning Official and providing the date that such application will be reviewed by the Clark County Historic Preservation Commission. A copy of such legal notice will be mailed to all property owners within 500 feet of the property on which the demolition is proposed. Such legal notice publication and mailing shall occur at least 30 days prior to the review of the application by the Clark County Historic Preservation Commission.

1. For buildings listed in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places the Clark County Historic Preservation Commission will review the application and associated reports and make a recommendation to the Building Official.

2. For buildings identified as an "eligible building" for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings and located within a Heritage Overlay District, but not listed in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places, the Planning Official will review the application and associated reports and make a recommendation to the Building Official.

    a. *Criteria for Approval of an Application for Demolition.* The following criteria for approval or denial shall be considered when reviewing an Application for Demolition:

C. The extent to which the demolition of the building will have a serious adverse impact on the cultural significance of the Heritage Overlay District.

1. The extent to which the building is so deteriorated and so lacking in historical fabric, that it would not be viable to retain the historic, cultural and architectural significance of the building through rehabilitation or renovation.

2. There is no reasonable alternative to demolition that would provide the owner with a reasonable economic return.

3. The extent to which the denial will deprive the owner of reasonable economic use of the underlying property.

    a. *Conditions on a Permit for Demolition.* Conditions including but not limited to the following conditions may be attached to a permit for demolition when a permit for the complete or partial demolition of a building in the Heritage Overlay District is issued:

D. The effective date of the permit may be delayed by up to 90 days to allow third parties to propose alternatives to demolition to the owner. A longer period of time may be set if agreed to by the applicant.

1. The submission of information that supplements and completes the information required by Section 20.550.050 (3)(b) above.

    a. Expiration of a Permit for Demolition: A permit for complete or partial demolition shall expire if the demolition authorized by the permit is not commenced within 180 days from the date of issuance of the permit. The Building Official or his/her designee may extend the time for commencement of work upon determining that delays in commencing the work were beyond the control of the owner. If the permit for demolition expires, a new application for demolition must be submitted and approved before demolition can be commenced.

20.550.060 Identification Plaque.

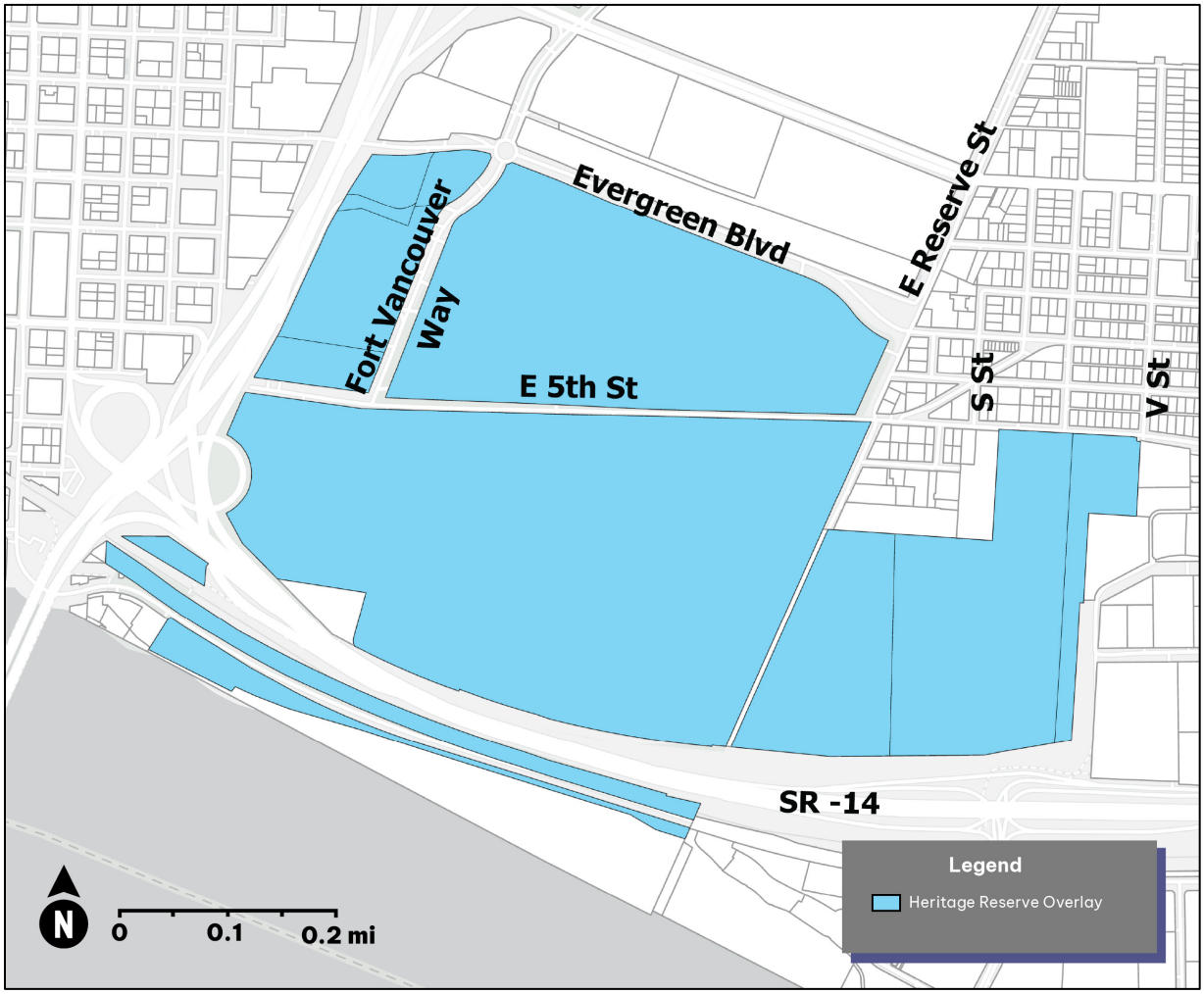
A. *Installation plaque criteria*. The owner of a designated historic building or site, or the occupant thereof, with the consent of the owner, may at his own expense install, in addition to any other signs permitted by ordinance, an identification plaque indicating name, date, architect or other appropriate information upon the property, provided that the size, material, design, location and text of such plaque has been first reviewed by the Clark County Historic Preservation Commission with final approval by the Planning Official.

20.550.070 Historic Reserve District.

A. *Purpose.* The federally designated Vancouver National Historic Reserve is unique in its cultural and historic resources. The purpose of this section is to establish standards that protect those resources and the historic character of the Reserve. To do so, the city is establishing an area of special regulation in the Vancouver Central Park Plan District. The Historic Reserve District is intended to result in a seamless environment that provides overall design and development standards while reflecting area and era specific standards within the District.

B. *Establishment of boundaries.* The Historic Reserve Conservation District shall include the properties known as the Vancouver Barracks, Fort Vancouver National Historic Site, Pearson Field Airport (includes the airfield and aircraft hanger facilities), Pearson Air Museum, and Jack Murdock Aviation Center, and Waterfront Park. These properties are generally located south of Evergreen Boulevard, east of the Interstate freeway I-5, and north of the Lewis & Clark Highway SR-14, the National Park Service property (referred to as Waterfront Park) and the Old Apple Tree Park located between SR-14 and the Columbia River as shown in Figure 20.550.070-1. As new property, owned by the Reserve Partners, is added to the Vancouver National Historic Reserve it will be included in the District boundaries. The Reserve Partners include the City of Vancouver, State of Washington, US Army, National Park Service at Fort Vancouver National Historic Site and the nonprofit Vancouver National Historic Reserve Trust.

FIGURE 20.550.070-1 HISTORIC RESERVE CONSERVATION DISTRICT



C. Regulation of uses.

1. *Permitted uses.* The following uses are permitted on all properties within the Historic Reserve Conservation District. Special Standards in subsection D 2 below provides information regarding compatible uses.

   a. Household living and home occupations.

   b. General Offices as defined in VMC 20.160.020 (C)(6)(a), excluding Medical Office as defined in VMC 20.160.020 (C)(6)(b) Use Classifications.

   c. Freestanding General Offices, as defined in VMC 20.160.020 (C)(6)(a) Use Classifications, housing Federal, State, County, City agencies or similar nonprofit organizations.

   d. Cultural Institutions, as defined in VMC 20.160.020 (B)(4) Use Classifications, such as museums and libraries.

e. Art Studios and Galleries, excluding uses that involve hazardous processes or require outdoor storage.

f. Eating and Drinking Establishments, as defined in VMC 20.160.020(C)(2) Use Classifications, including restaurants and microbreweries.

g. Sales-Oriented General Retail Stores, as defined in VMC 20.160.020(C)(4)(a) Use Classifications. These uses can include on-premises production of retail products offered for sale at the site including but not limited to bakery, leather shop, or ceramics or wood-working studio, but excluding such a use that involves hazardous processes or requires outdoor storage.

h. Personal Service General Retail, as defined in VMC 20.160.020(C)(4)(b) Use Classifications.

i. Commercial Lodging, as defined in VMC 20.160.020(C)(1) Use Classifications.

j. Educational Facilities such as schools and institutions of higher education.

k. Recreation uses.

l. Parades, special community events, air shows, car shows and similar public gatherings consistent with the city's Vancouver National Historic Reserve Special Events Policy.

m. Airfield and Aircraft Hangar Facilities, including aircraft and aircraft component maintenance.

n. Performing Arts Center.

o. EV Basic Charging Stations, if accessory to a permitted use.

p. EV Rapid Charging Stations, if accessory to a permitted use.

D. *Special standards.* All development in the Historic Reserve Conservation District shall comply with the following standards and the Washington State Historic Building Code Chapter 51-19 WAC. These special standards supersede the Design Guidelines for Vancouver Central Park as adopted by Ordinance M-2073. All other provisions in the City of Vancouver Development Code apply. The Vancouver National Historic Reserve is also regulated under the US Secretary of the Interior's Standards for the Treatment of Historic Properties, 1995. Lands within the District will be managed with respect to pertinent state, federal, and local regulations. The provisions of this special district do not apply to existing and future state or federal highway properties and rights-of-way located within or adjacent to the Historic Reserve Conservation District.

1. Development and changes that have taken place over the course of time are evidence of the unique history and character of each building, structure, or site and its environment. Further changes to the existing development shall be compatible with the eight historic periods established for specific areas within the Historic Reserve. These eight historic periods include: Indian Country (pre-1824), Hudson Bay Company Period (1824-1846), Fort Vancouver and Vancouver Barracks (1847-1860), U.S. Army (1861-1916), U.S. Army and World War I (1917-1918), U.S. Army and Civilian Conservation Corps (1919-1941), U.S. Army and World War II (1942-1947), and Modern Era/ National Park Service Period (1948----).
2. Reasonable effort shall be made to provide a compatible use for a property, that will require minimal change to the defining characteristics, of the buildings, structure, or its site and its environment in conformance with the Secretory of the Interior's Standards for Rehabilitation, or to use a property for its originally intended purpose. A compatible use is defined as a use that is consistent, complementary and does not conflict with the historic period.
3. The distinguishing original qualities or character of a building, structure, or site and its environment, as defined in the West Barracks by the National Park Service 2002 "Historic Structures Report" and for National Park Service owned property as outlined in the "General Management Plan" shall not be destroyed.
4. New construction should be limited to the reconstruction of the vanished or nonsurviving portions of a historic property or infill construction compatible with the scale and design of buildings in the immediate area. As described in The Secretary of the Interior's Standards for the Treatment of Historic Properties-1995, reconstructions is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a nonsurviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.
5. Distinctive stylistic features or examples of skilled craftsmanship that characterize a building, structure, or site shall be preserved except where demonstrated to be economically or physically impracticable as determined by the City's Planning Official.
6. Deteriorated architectural features shall be repaired rather than replaced, wherever possible. In the event replacement is necessary, the new material shall, to the extent practicable, match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features shall be based on accurate duplications of features, substantiated by historic, physical, or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.
7. The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken.

8. Every reasonable effort shall be made to protect and preserve archaeological resources affected by, or adjacent to, any project. Activities within the special district will be required to meet the archaeological provisions of VMC 20.710.
9. Contemporary design for alterations and additions to existing properties shall be permitted when such alterations and additions do not destroy significant historical, architectural or cultural material, and/or the character of the property, neighborhood or environment.
10. Whenever possible, new additions or alterations to structures shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired.
11. Non-contributing buildings and structures, as identified in the 2007 National Historic Register listing of the Vancouver National Historic Reserve, may be removed.
12. Use of sustainable (environmentally sound and energy efficient) products and materials shall be required for all new construction and reconstruction throughout the special district. An exception may be granted by the Planning Official provided the applicant can clearly demonstrate that use of sustainable products and materials will significantly detract from the historic integrity of the individual building or the special district.
13. Public art and commemorative works within the special district shall be consistent with the Vancouver National Historic Reserve Public Art and Commemorative Works Policy.
14. Holiday or theme decorations and lighting shall present a coordinated appearance appropriate to the historic period of a building, structure, or site and its environment. All such decorations and lighting shall be subject to review and approval by the Reserve Partners and shall comply with applicable safety regulations.
15. Buildings shall be maintained at a minimum to the provisions of VMC 17.14 Minimum Property Maintenance Code as adopted by the city.
16. Off-street parking shall be provided as required in VMC 20.450.045 Parking and Loading Revised. No parking lot may be developed in the front yard of any building within the Vancouver Barracks (parking in side yards should seldom be allowed, if at all).
17. Undergrounding of utilities is required throughout the special district except where demonstrated to be economically or physically impractical as determined by the City's Planning Official. The Hudson Bay Company cemetery property is exempt from this requirement due to federal regulations regarding disturbance of tribal cemeteries.

18. Site and building improvements shall be designed to consider accessibility throughout the special district and to incorporate those provisions in ways that result in minimal visual impact, such as utilizing elevated grades in lieu of ramps, and providing public access to main entrances in lieu of secondary entrances.

19. Screening of Off-Street Parking Areas.

    a. Parking areas shall be designed to provide safe and convenient movement of motor vehicles, limit vehicular/pedestrian conflicts, limit paved areas, provide for screening of paved areas, and soften the visual impact of parking areas by providing interior plantings.

    b. Evergreen plantings to provide year-round perimeter screening of parking areas are required except where physically impractical as determined by the City's Planning Official.

20. Pedestrian Connectivity.

    a. Provide sidewalk and walkways to encourage and accommodate pedestrian circulation and access movement between buildings, activity centers, transit stops, and parking areas within the Historic Reserve Conservation District and along its public streets.

    b. Sidewalks and walkways shall be hard surfaced or other approved materials consistent with historic nature of the property such as decomposed granite surfacing.

21. Thematic Landscape.

    a. Landscaping improvements shall be designed to be compatible with the historic buildings and appropriate to the historic periods for specific areas within the Historic Reserve Conservation District.

    b. Landscape plantings shall be maintained and enhanced. New plantings shall augment and complement the existing trees and plants with similar or compatible species.

    c. Landscape plantings of Pacific Northwest native plant species shall be used where practicable within the special district.

    d. Permanent underground irrigation systems shall be provided for proper watering and maintenance of lawn and landscape planted areas. The Hudson's Bay Company cemetery property is exempt from this requirement due to federal regulations regarding disturbance of tribal cemeteries.

    e. Removal, repair and replacement of existing trees shall be carefully considered and shall be subject to review and approval by the City's Urban Forester. Designated heritage or centennial trees, along with any individual tree, group of trees or 'allee' of trees that is significant to the cultural landscape of the Reserve shall be preserved and maintained.

f. Street trees shall reflect historic types and planting patterns consistent with the specific area of the Historic Reserve and shall be subject to review and approval by the City's Urban Forester.

g. Existing view sheds of the Columbia River and Mount Hood shall be preserved.

22. Exterior Light Standards.

a. Light standards along streets and walkways shall be pedestrian scaled and lower than conventional street light standards and provide more illumination of sidewalks and walkways for public safety of pedestrians. Pedestrian scale light standards are lower in pole height and more closely spaced than conventional street lights.

b. Light standards along streets and walkways within the Vancouver Barracks, Pearson Air Museum and Pearson Field Airport shall be the Shepherd's Crook style light standard as adopted by the City of Vancouver for the downtown Vancouver area. These Shepherd's Crook style light standards shall be painted dark green (to match existing standards within the Historic Reserve) and shall be installed with a preferred pole height of 14-foot to a maximum of 20-foot pole height, as measured from ground level to the top of vertical tapered pole. The light source shall be high-pressure sodium lamps and the preferred lamp shield shall be a frosted globe-shaped protective lens. The City may approve modifications to this standard to address individual, location-specific safety issues.

c. Light standards within Fort Vancouver National Historic Site shall be as determined by the National Park Service.

23. Seat Benches and Trash Receptacles.

a. Location of seat benches and trash receptacles shall be compatible with the historic character of the Historic Reserve.

b. Seat benches shall be provided at appropriate locations as opportunities for resting, social interaction, and stationary or passive pedestrian activities. Benches with backrests and armrests are recommended to accommodate and assist the elderly and physically challenged.

c. Seat benches and trash receptacles within the Vancouver Barracks and Pearson Field Airport shall be appropriate to the historic period of each location and shall be as approved by the Vancouver National Historic Reserve Partners.

d. Seat benches and trash receptacles within Fort Vancouver National Historic Site shall be as determined by the National Park Service.

24. Fences and Walls.

    a. Fences and walls within the Vancouver Barracks, Pearson Air Museum and Pearson Field Airport shall be designed to be compatible with the historic buildings of these areas. The use of natural materials such as wood and native stone is required for fences and walls. The use of chain link fencing is prohibited except where use of other fencing materials is demonstrated to be economically or physically impracticable as determined by the City's Planning Official. Where chain link fencing is allowed, it shall be of a color to minimize visibility and screened from view from public rights-of-way with appropriate landscaping.

    b. Fences and walls within Fort Vancouver National Historic Site shall be as determined by the National Park Service.

    c. Fences shall be limited to reconstructions of historically documented fences, those replacing existing historic fences and only essential new fences. Reconstruction of historically documented fences is encouraged.

25. Signs.

    a. Informational and directional signs within the Vancouver Barracks, Pearson Air Museum and Pearson Field Airport shall be as determined by the Vancouver National Historic Reserve signage program. Wayside signage shall be consistent throughout the special district. In general, new, nonessential signage is discouraged.

    b. Regulatory signs for traffic control purposes (such as stop signs, yield signs and speed limit signs) shall comply with approved standards of the national Manual of Uniform Traffic Control Devices (MUTCD).

26. Access Control Bollards.

    a. The City of Vancouver's Discovery Trail has a standard pre-cast concrete square bollard. This bollard shall be used to denote the Discovery Trail where it runs through the Historic Reserve.

    b. Bollards within the Vancouver Barracks, Pearson Air Museum and Pearson Field Airport that are not located on the Discovery Trail shall be contemporary but compatible.

    c. Bollards within Fort Vancouver National Historic Site shall be as determined by the National Park Service.

    d. Use of bollards should be limited to areas where they are considered to be essential.

27. Screening of Service Areas and Mechanical Equipment.

    a. All service areas, trash collection areas, exterior storage areas, and mechanical equipment shall be screened from view from streets and public areas.

b. Mechanical equipment for heating and ventilation of buildings shall be carefully placed to minimize its visibility from surrounding public areas and facilities. Placement of mechanical equipment on building rooftops is prohibited except where demonstrated to be economically or physically impractical as determined by the City's Planning Official.

c. Screening material shall consist of visually obscuring improvements such as evergreen trees or shrub hedges or opaque building features such walls or fences.

d. Screening constructed of building materials shall be compatible with the design and character of nearby buildings.

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CHAPTER 20.560
NOISE IMPACT OVERLAY DISTRICT

Sections:

20.560.010 Purpose.

20.560.020 Establishment of Boundaries.

20.560.030 Applicability.

20.560.040 Approval Process.

20.560.050 Performance Standards.

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20.560.070 Review and Modification.

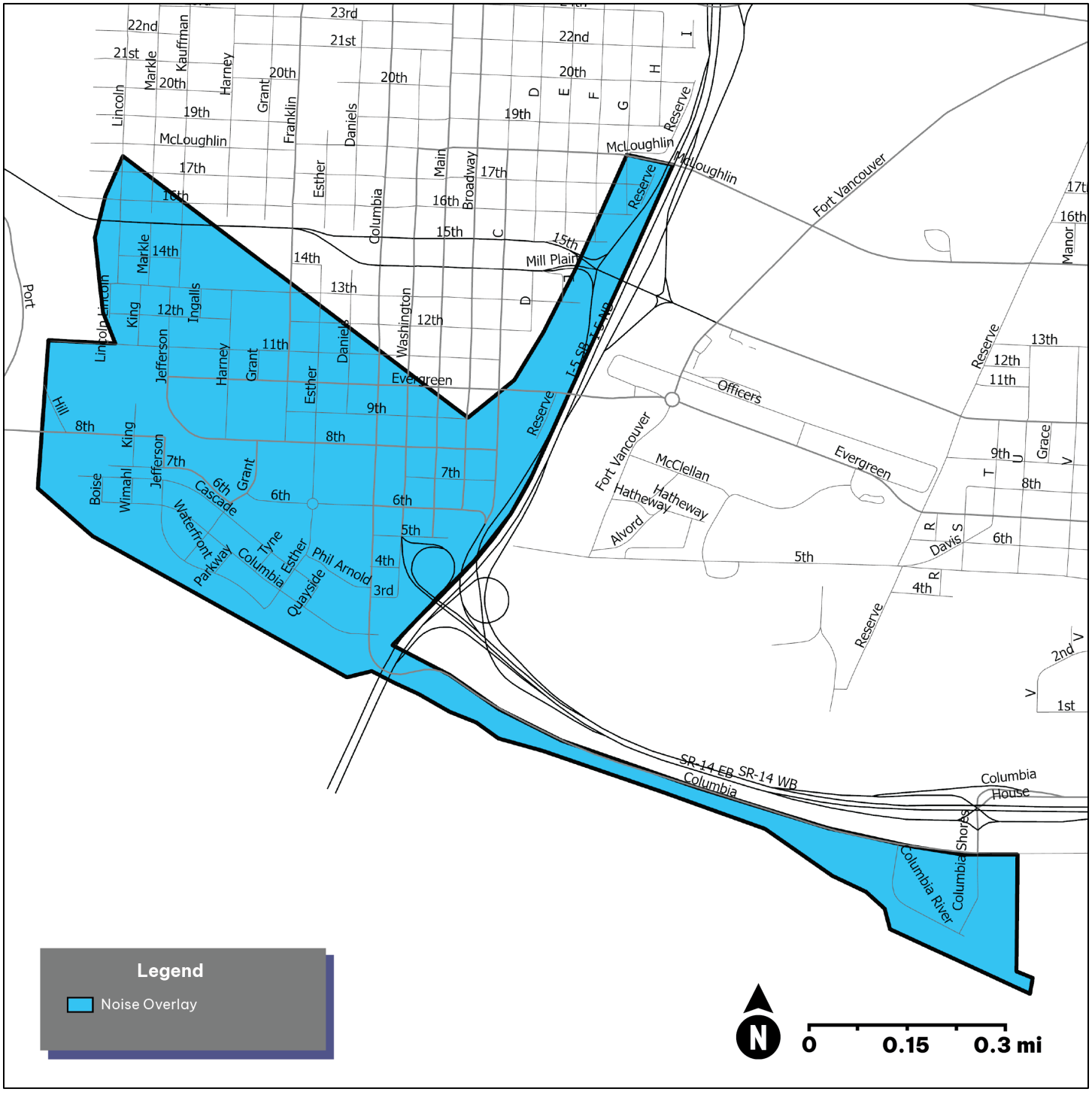
20.560.010 Purpose.

General. The purpose of the Noise Impact Overlay District is to provide a means by which the public and owners of property within the overlay district can be advised that unusually high levels of aircraft, railroad and/or traffic noise are to be expected on properties in such a district, and that such levels of sound reasonably require that special construction standards involving sound insulation hereinafter set forth be met on all new residential construction in such a district.

20.560.020 Establishment of Boundaries.

A. *Boundaries of Noise District.* The boundaries of the Noise Impact Overlay District are as set forth in Figure 20.520.020-1. Such boundaries delineate that part of the city which is most affected by noise from Portland International Airport, Burlington Northern Railroad, I-5 freeway and Pearson Airpark, or by the combined effect thereof. Such boundaries are based upon the 1988 65 Ldn Noise Contour shown on the 1983 PIA Noise Abatement Plan and are consistent with the noise impact studies of the Washington State Department of Transportation for the I-5 corridor. Large-scale maps showing the boundaries of the district shall be maintained in the office of the city's community development department. For lots or parcels located only partially within the district, this chapter shall apply if all or part of the exact building site is within the district.

FIGURE 20.560.020-1. NOISE IMPACT OVERLAY



B. *Amendment of boundaries.* The boundaries of the district hereby created shall be deemed amended whenever such boundaries are found by the Planning Official to require reasonable amendment to comply with the new noise impact standards thereinafter established; provided, in any case where the planning official finds it necessary to so amend such boundaries, his action may be appealed to the planning commission by any affected property owner or prospective purchaser by means of a Type III procedure, as governed by VMC 20.210.060.

20.560.030 Applicability.

A. *General.* All new residential uses within the Noise Impact Overlay District, are subject to the provisions and the regulations of this Chapter.

B. *Regulated structures.* These regulations shall apply to:

1. All new residential uses;
2. Expansion by 10 % or more of an existing residential structure; and
3. Reconstruction of an existing residential structure where the cost of reconstruction exceeds 75% of the value of the original structure.

20.560.040 Approval Process.

A. *Permit issuance.* The City shall not issue any building permit or other development permit allowing construction of any new residential structure intended for use as a dwelling or dwellings in the Noise Impact Overlay District except in compliance with this Section.

B. *Approval process.* An applicant for such a permit shall prepare a Noise Impact Reduction Plan subject to the following procedures:

1. *Residential (6 dwelling units or less).* An applicant for a new or expanded residential unit (6 dwelling units or less) shall request approval of the Noise Impact Reduction Plan by means of a Type I procedure, as governed by Section 20.210.040 VMC, using the performance standards contained in Section 20.560.050 VMC below.
2. *Residential (7 or more dwelling units).* An applicant for a project with 7 or more dwelling units shall request approval as part of site plan review, as governed by Chapter 20.270 VMC.

C. *Submission requirements.* The Noise Impact Reduction Plan, must include the following:

1. A map of the property, drawn to scale, and an identification of the sources of noise that result in noise impacts on the property to Ldn levels of 65 or greater.
2. A statement of the methods proposed to be used to accomplish sound reduction.

3. A statement that the applicant has consulted with any agency or corporation responsible for managing noise generated by a source identified in 20.560.020 VMC, and a certification by the applicant that the proposed construction is designed to reduce sound impacts within structures on the property so as to mitigate any conflict between the noise source and the use of the residential building as a dwelling.
4. A time schedule for construction of the project that clearly shows that sound reduction will have been accomplished prior to any occupancy of the rooms for residential use.
5. An estimate of the Ldn values outside of the proposed building, and an evaluation of the dBA level of single impacts, and a statement by the applicant that the existence of noise levels is acknowledged to exist, as governed by Section 20.560.060 VMC below.

20.520.050 Performance Standards.

A. *Construction standards.* Based on the Noise Impact Reduction Plan required in Section 20.560.040 VMC above, all regulated structures shall be constructed with sound insulation or other means which are rated to provide a decibel reduction sufficient to achieve a day/night average interior noise level of 45 Ldn for that specific property. A Washington licensed professional engineer or registered architect, knowledgeable in acoustical engineering or design, shall certify that the building plans are adequate to reduce interior noise levels to 45 Ldn or less. In preparing this certification the engineer or architect:

1. Must take into account the construction materials, type of foundation, soil type and other physical factors of the site in the evaluation.
2. Must use the ANSI, ISO, ASTM, or another nationally accepted standard for the transmission coefficients of various materials, and may assume all openings, e.g. doors and windows
3. In lieu of Subsection (1) or (2) above, the applicant's engineer or architect may accomplish the certification by a study of existing structures located within the same Ldn Noise Contour and vicinity, e.g., block, subdivision, park or moorage, to determine the expected noise level of the proposed structure(s).

B. *Alternate method.* In lieu of certification by a registered engineer as provided in subsection (A) above, an applicant may use standard-wall construction as provided in Reference Section 20.560.050-1, provided that the standard construction is rated to provide enough sound insulation that, when such rating is subtracted from the Ldn value established in the Noise Impact Reduction Plan, the average interior noise level will be reduced to 45 Ldn or less.

C. *Acoustical construction concepts.* (This Section, with some editing, is taken from the Audible Landscape, FHWA[1].) Noise can be intercepted as it passes through the walls, floors, windows, ceilings and doors of a building. Examples of noise-reducing materials and construction techniques are described in the pages that follow.

1. *Sound Transmission Class (STC).* To compare the insulation performance of alternative constructions, the STC is used as a measure of a material's ability to reduce sound. Sound Transmission Class is equal to the number of decibels a sound is reduced as it passes through a material. Thus, a high STC rating indicates a good insulating material. It takes into account the influence of different frequencies on sound transmission, but essentially the STC is the difference between the sound levels on the side of the partition where the noise originates and the side where it is received. For example, if the external noise level is 85dB and the desired internal level is 45dB, a partition of 40 STC is required. The Sound Transmission Class rating is the official rating endorsed by the American Society of Testing and Measurement. It can be used as a guide in determining what type of construction is needed to reduce noise.

2. *Walls.* Walls provide building occupants with the most protection from exterior noise. Different wall materials and designs vary greatly in their sound insulating properties. Figure 20.560-2 shows a sample of wall types ranging from the lowest to the highest sound insulation values.

    a. Remember that the effectiveness of best wall construction will be substantially reduced if vents, mail slots or similar openings are permitted in the walls. If vents are permitted the ducts must be specially designed and insulated to make sure noise does not reach the inside. The best approach is simply to eliminate all such openings on affected walls.

3. *Windows.* Sound enters a building through its acoustically weakest points, and windows are one of the weakest parts of a wall. An open or weak window will severely negate the effect of a very strong wall. Whenever windows are going to be a part of the building design, they should be given acoustical consideration. Figure 20.560-2 illustrates the effects of windows on the sound transmission of walls. For example, if a wall with an STC rating of 45 contains a window with an STC of 26 covering 30 % of its area, the overall STC of the composite partition will be 35, a reduction of 10dB.

[1] The Audible Landscape: A Manual for Highway Noise and Land Use, U.S. Department of Transportation, the Federal Highway Administration, November, 1974. (GPO Stock #5000-00079)

The first step in reducing unwanted sound is to close and seal the windows. The greatest amount of sound insulation can be achieved if windows are permanently sealed. However, operable acoustical windows have been developed which are fairly effective in reducing sound. Whether or not the sealing is permanent, keeping windows closed necessitates the installation of mechanical ventilation systems. The smaller the windows, the greater the transmission loss of the total partition of which the window is a part. Reducing the window size is a technique that is used because: (a) it precludes the cost of expensive acoustical windows; and, (b) it saves money by cutting down the use of glass. The problems with this technique are: (a) it is not very effective in reducing noise; e.g., reducing the proportion of window to wall size from 50 % to 20 % reduces noise by only 3 dB; and, (b) building codes require a minimum window to wall size ratio. If ordinary windows are insufficient in reducing noise impacts in spite of sealing techniques, thicker glass can be installed. In addition, this glass can be laminated with a tough transparent plastic that is both noise and shatter resistant. Glass reduces noise by the mass principle; that is, the thicker the glass, the more noise-resistant it will be. A 1/2" thick glass has a maximum STC rating of 35dB compared to a 25dB rating for ordinary 3/16" glass. However, glass thickness is only practical up to a certain point, when STC increases become too insignificant to justify the cost. For example, a 1/2" glass can have an STC of 35; increasing the thickness to ¾" only raises the STC to 37. However, a double glass acoustical window consisting of 2- 3/16" thick panes separated by an airspace will have an STC of 51 and can cost less than either solid window.

In addition to thickness, proper sealing is crucial to the success of the window. To prevent sound leaks, single windows can be mounted in resilient material such as rubber, cork or felt.

Double-glaze windows are paired panes separated by an airspace or hung in a special frame. Generally, the performance of the double-glazed window may be increased with: (a) increased airspace width; (b) increased glass thickness; (c) proper use of seals; (d) slightly dissimilar thickness of the panes; and, (e) slightly nonparallel panes.

In general, the airspace between the panes should not be less than 2-4" if an STC above 40 is desired. If this is not possible, a heavy single-glazed window can be used. The use of slightly nonparallel panes is a technique employed when extremely high sound insulation is required, such as in control rooms of television studios.

The thickness of double-glazed panes may vary from 1/8" to ¼" or more per pane. Although thickness is important, the factors that most determine the noise resistance of the window are the use of sealant and the width of the airspace.

As in the case of all windows, proper sealing is extremely important.

4. *Doors.* Acoustically, doors are even weaker than windows, and more difficult to treat. Any door will reduce the insulation value of the surrounding wall. The common, hollow core wood door has an STC rating of 17dB. Taking up about 20% of the wall, this door will reduce a 48 STC wall to 24 STC. To reduce noise, a hollow-core door can be replaced by a heavier solid-core wood door that is well sealed and is relatively inexpensive. A solid-core wood door with vinyl seal around the edges and carpeting on the floor will reduce the same 48 STC wall to only 33dB.

   The alternative solution to doors is to eliminate them whenever possible from the severely affected walls and place them in more shielded walls.

   In any case, no mail slots or similar openings would be allowed in exterior doors.

5. *Roofs*. Acoustical treatment of roofs is not usually necessary unless the noise is extremely severe or the noise source is passing over the building. The ordinary plaster ceiling should provide adequate sound insulation except in extremely severe cases. An acoustically-weak roof which is likely to require treatment is the beamed ceiling. Beamed ceilings may be modified by the addition of a layer of fiberglass or some other noise resistant material. Suspended ceilings are the most effective noise reducers but they are also the most expensive.

REFERENCES

1 U.S. Department of Housing and Urban Development, A Study of Techniques to Increase the Sound of Insulation of Building Elements, Report NO. WR 73-5, Washington, D.C., June, 1973.

2 Ibid.

3 D.E. Bishop and P.W. Hirtle, "Notes on the Sound Transmission Loss of Residential-Type Windows and Doors," Journal of the Acoustical Society of America, 43:4 (1968).

4 U.S. Gypsum, Sound Control...p. 100.

5 Ibid p. 15.

FIGURE 20.560-2. WALL SOUND INSULATION CHARACTERISTICS

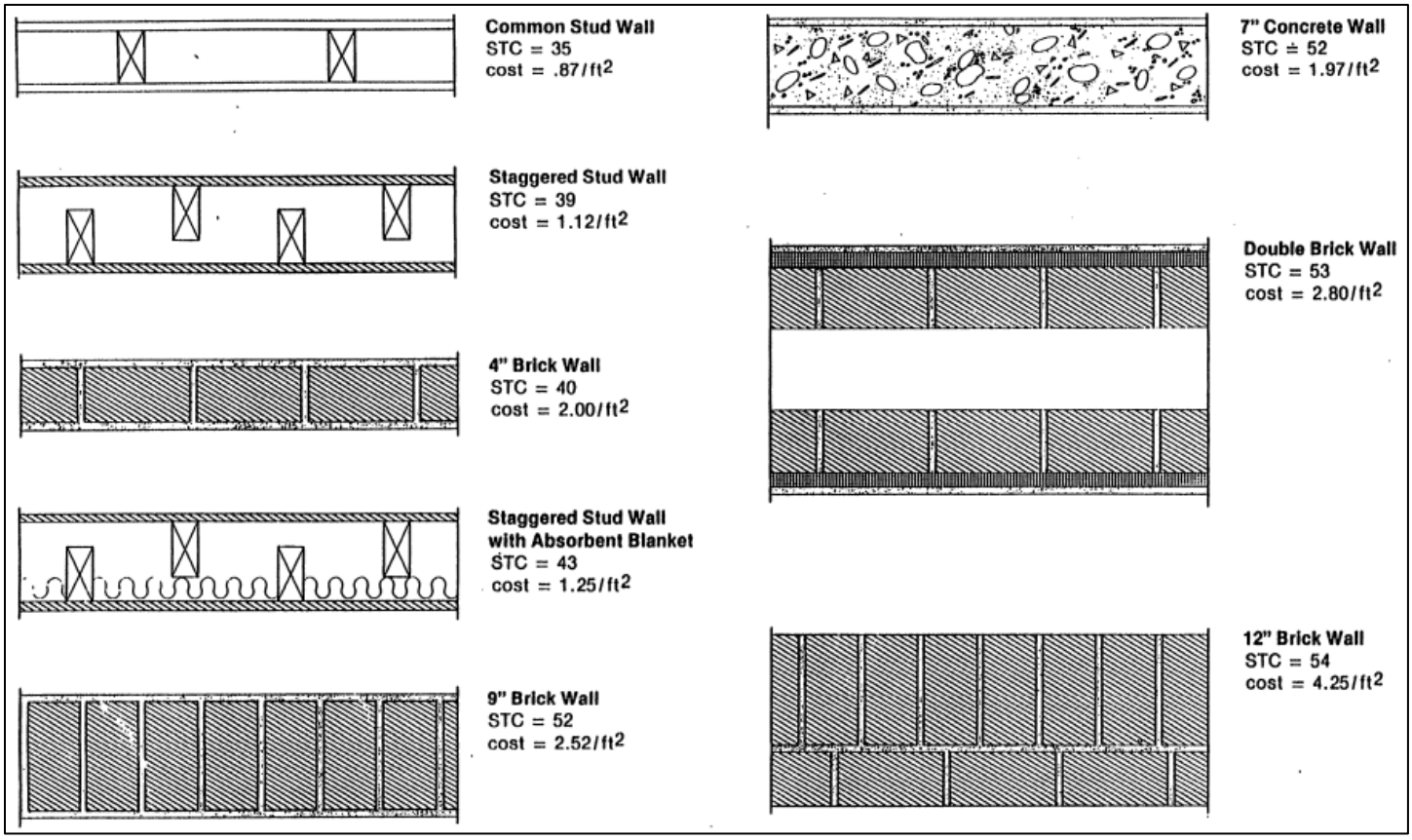
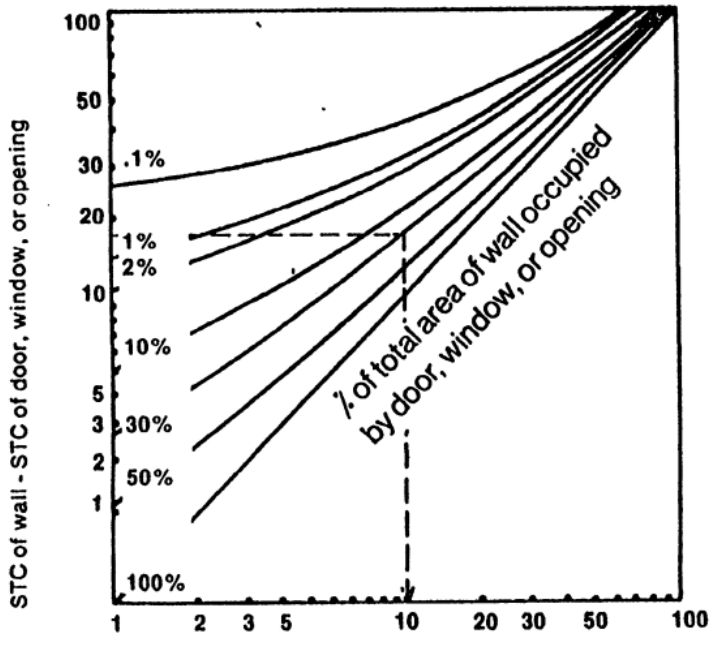


FIGURE 20.560-3. WINDOWS' SOUND TRANSMISSION CHARACTERISTICS



Instructions on use of graph

1. Subtract the STC value of the door, window or opening from the STC value of the wall.
2. Enter the vertical axis of the graph at the point that matches the value from step 1.
3. Read across to the curve that represents the percentage of the total area of the wall that is taken up by the door, window, or opening.
4. Read down to the horizontal axis.
5. Subtract the value on the horizontal axis from the original STC value of the wall. The result is the composite STC value of the wall and the door, window or opening.

20.560.060 Disclosure Statement Required.

A. *Required disclosure statement*. As a condition of a building or development permit for residential use within the Noise Impact Overlay District, the applicant shall sign and record a disclosure statement in a form provided by the City consistent with this Chapter. Such statement shall clearly document that the premises may be adversely affected by noise. The statement shall also reference any Noise Impact Reduction Plan applicable to the property, and the applicant shall agree to provide a copy of this statement to all prospective purchasers or tenants of the property who intend to occupy the structure as a dwelling. A signed copy of such statement and proof that it has been recorded with the County Auditor must be presented to the Planning Official prior to issuance of any such permit. If the overlay district is modified under Section 20.560.020(B) VMC so as to reduce the size of such zone or to delete any land therefrom, the affected property owner may amend such disclosure statement to reflect such change, and upon written approval of the Planning Official, may file a supplemental statement showing such change.

20.560.070 Review and Modification.

A. *General.* There shall be review by the Planning Commission of the boundaries of the Noise Impact Overlay District at least every 5 years. This review shall be based on the location of the 65 Ldn noise contour provided by the Port of Portland, the Washington Department of Transportation, and/or other reliable sources. (Note: For purposes of establishing review dates, this Chapter was adopted by the City on June 17, 1985.)

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CHAPTER 20.570
AIRPORT HEIGHT OVERLAY DISTRICT

Sections:

20.570.010 Purpose.

20.570.020 Establishment of Boundaries.

20.570.030 Applicability.

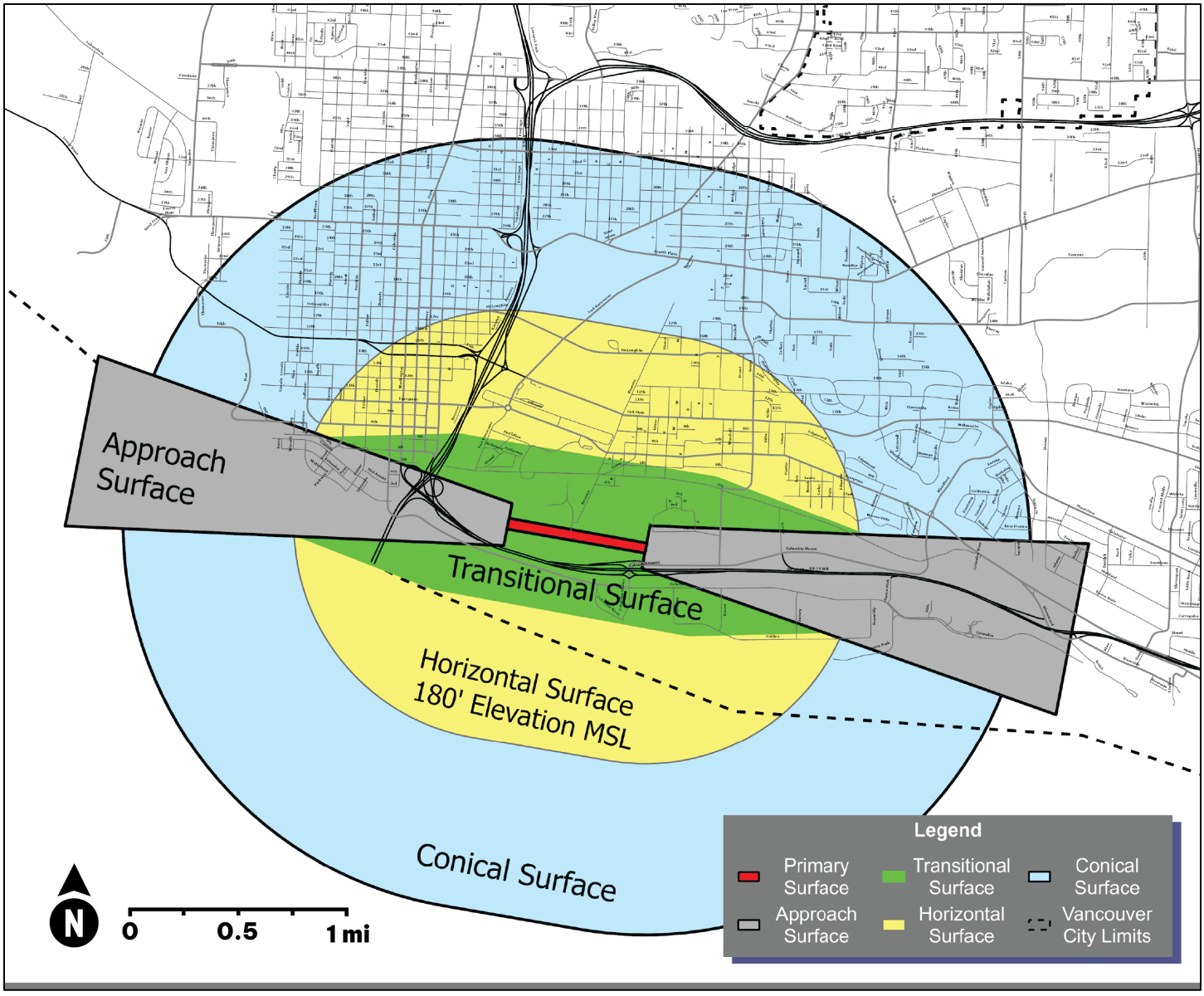
20.570.010 Purpose.

General. The Airport Overlay District has been established in order to protect the health, welfare, safety and quality of life of the general public, property owners and aircraft operators and to protect the long-term viability of Pearson Field Airport as an essential public facility.

20.570.020 Establishment of Boundaries.

The provisions of the Airport Height Overlay District shall apply to lands identified and illustrated in Figure 20.570.020-1.

FIGURE 20.570.020-1. AIRPORT HEIGHT OVERLAY DISTRICT



20.570.030 Applicability.

A. Pearson Airpark approaches:

1. No use shall be located within an approach surface, transitional surface, horizontal surface or conical surface as defined by Figure 20.570-2 in such a manner to create interference with navigable airspace, navigational signals or radio communications between the airport and aircraft or to make it difficult for pilots to distinguish between airport lights and other lights. Uses shall not result in glare in the eyes of pilots using the airport, impair visibility in the vicinity of the airport, create bird strike hazards, or otherwise in any way endanger or interfere with the landing, take-off or maneuvering of aircraft intending to use the airport.
2. S*pecific requirements*.
    a. *Structure height limitations.* No structure, including any roof-top appurtenance, shall be erected, altered, or maintained and no tree shall be allowed to grow on land which lies directly under any approach surface, transitional surface, horizontal surface or conical surface as defined in Chapter 20.150 VMC Definitions to a height in excess of the applicable height limit established for such surface or that are allowed in accordance with the adopted CFR Federal Aviation Administration Regulations Part 77.
    b. *Surface height limitations.* Development shall be designed so as not to penetrate or interfere in any way with the airport's surfaces as defined in Chapter 20.150.040B consistent with Federal Aviation Administration Regulations Part 77. Penetration of any airport surface as defined in Part 77 may only be allowed if explicitly authorized by the FAA.
    c. *Lighting.* New development that creates glare or lighting that interferes with lights necessary for aircraft landings is prohibited.
    d. *Appropriate notice.* Applicants with property within this overlay district shall provide written notice to, and requests for written comments from the State Aeronautics Division, Federal Aviation Administration and the Airport operator. Documentation of notice and written comments received by the applicant shall be provided to the city at the pre-application conference. Where no pre-application conference is required, documentation of notice and written comments received by the applicant shall be provided with the application packet. Where the applicant has provided written notice and request for comments and the agency or airport operator has failed to respond within 45 days from the date the written request was mailed, the applicant may submit the pre-application without the required comments. Applicants should be aware of federal notification and permitting requirements when construction is proposed on or near airports. Applicants should be aware that FAA height restrictions include construction equipment, such as cranes. Federal Aviation Administration Regulations, Part 77 – Objects Affecting Navigable Airspace, outline the specific criteria for FAA notification. The FAA Form 7460-1 is used for Federal Aviation Administration notification.

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20.600
SUBAREA PLANS

Sections:

20.610 112th Avenue Corridor Subarea Plan.

20.620 Central Park Subarea Plan.

20.630 Evergreen And Grand Commercial Corridors Plan.

20.640 Fourth Plain Subarea Plan.

20.650 Fruit Valley Subarea Plan.

20.660 Riverview Gateway Subarea Plan.

20.670 Section 30 Subarea Plan.

20.680 The Heights Subarea Plan.

20.690 City Center Subarea Plan.

CHAPTER 20.610
112TH AVENUE CORRIDOR SUBAREA PLAN

Sections:

20.610.010 Purpose.

20.610.020 112th Avenue Corridor Plan Area.

20.610.030 Plan Documents.

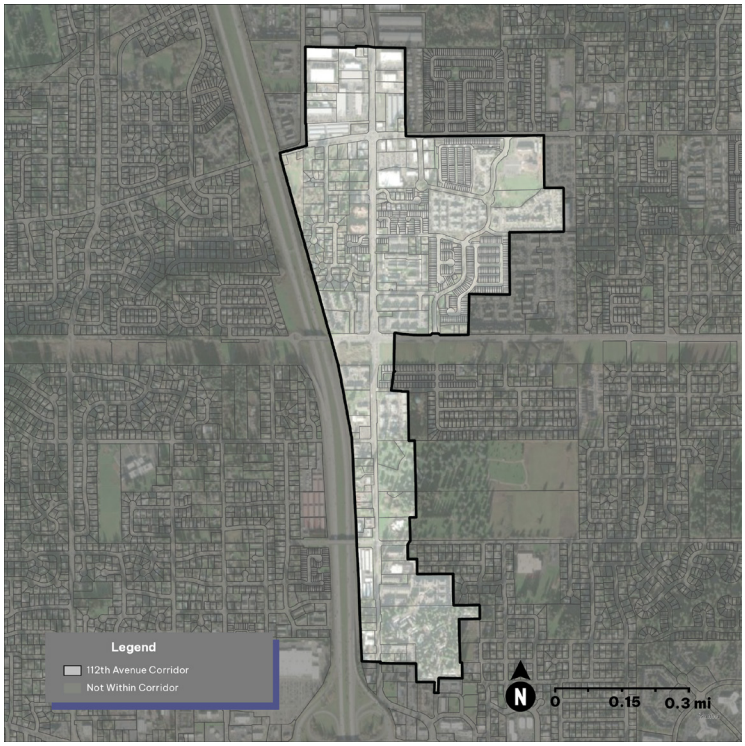
20.610.010 Purpose.

Purpose. The 112th Avenue Corridor Subarea is envisioned as a walkable (connected, safe, and comfortable) community. The primary street, 112th Avenue, as well as its adjacent developments will provide for safe pedestrian, bicycle and vehicle travel, allowing connectivity to services, jobs, housing, and amenities along the corridor. To achieve walkability future development will incorporate interconnected streets and trails, diverse housing choices, mix of uses, gathering places, and enhanced pedestrian amenities. The I-205 interchanges and the transit station will also be integrated into the fabric of the area and support walkability

20.610.020 112th Avenue Corridor Plan Area.

The plan area is bounded by Interstate 205 on the west, to NE 4th Street on the south, to NE 33rd Street on the north with an irregular boundary on the east as depicted in Figure 20.610.020-1.

FIGURE 20.610.020-1: 112TH AVENUE CORRIDOR SUBAREA



20.610.030 Plan Documents.

Developments within the 112th Avenue Corridor Plan Area shall substantially comply with the following plan documents

A. 112th Avenue Corridor Subarea Plan

B. 112th Avenue Corridor Design Guidelines

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CHAPTER 20.620
CENTRAL PARK SUBAREA PLAN

Sections:

20.620.010 Purpose.

20.620.020 Central Park Plan Area.

20.620.030 Plan Documents.

20.620.010 Purpose.

Purpose. Prominently located at the Columbia River gateway to Washington state and the Vancouver City Center, the Central Park Planning area possesses unique public destinations of national, state and local significance. The 2008 Central Park Plan envisions a unified sense of place by celebrating a shared historic landscape, announcing gateways into the plan area and to key features, establishing an enhanced and cohesive great street and interconnecting trail network within the plan area and to its neighbors. At the same time, allow the distinct public use and characteristics of the three districts to expand and flourish.

20.620.020 Central Park Subarea Plan.

Establishment of Boundaries. In general, the Columbia River to the south, Interstate 5 to the west, Fourth Plain Boulevard to the north and East Reserve Street to the east define the plan area, as illustrated in Figure 20.620.020-1.

FIGURE 20.620.020-1: CENTRAL PARK SUBAREA



20.620.030 Plan Documents.

Developments within the Central Park Subarea Plan shall substantially comply with the following plan documents

A. Central Park Plan

B. Central Park Parking Plan

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CHAPTER 20.630
EVERGREEN AND GRAND COMMERCIAL CORRIDORS PLAN

Sections:

20.630.010 Purpose.

20.630.020 Evergreen and Grand Commercial Plan Area.

20.630.030 Plan Documents.

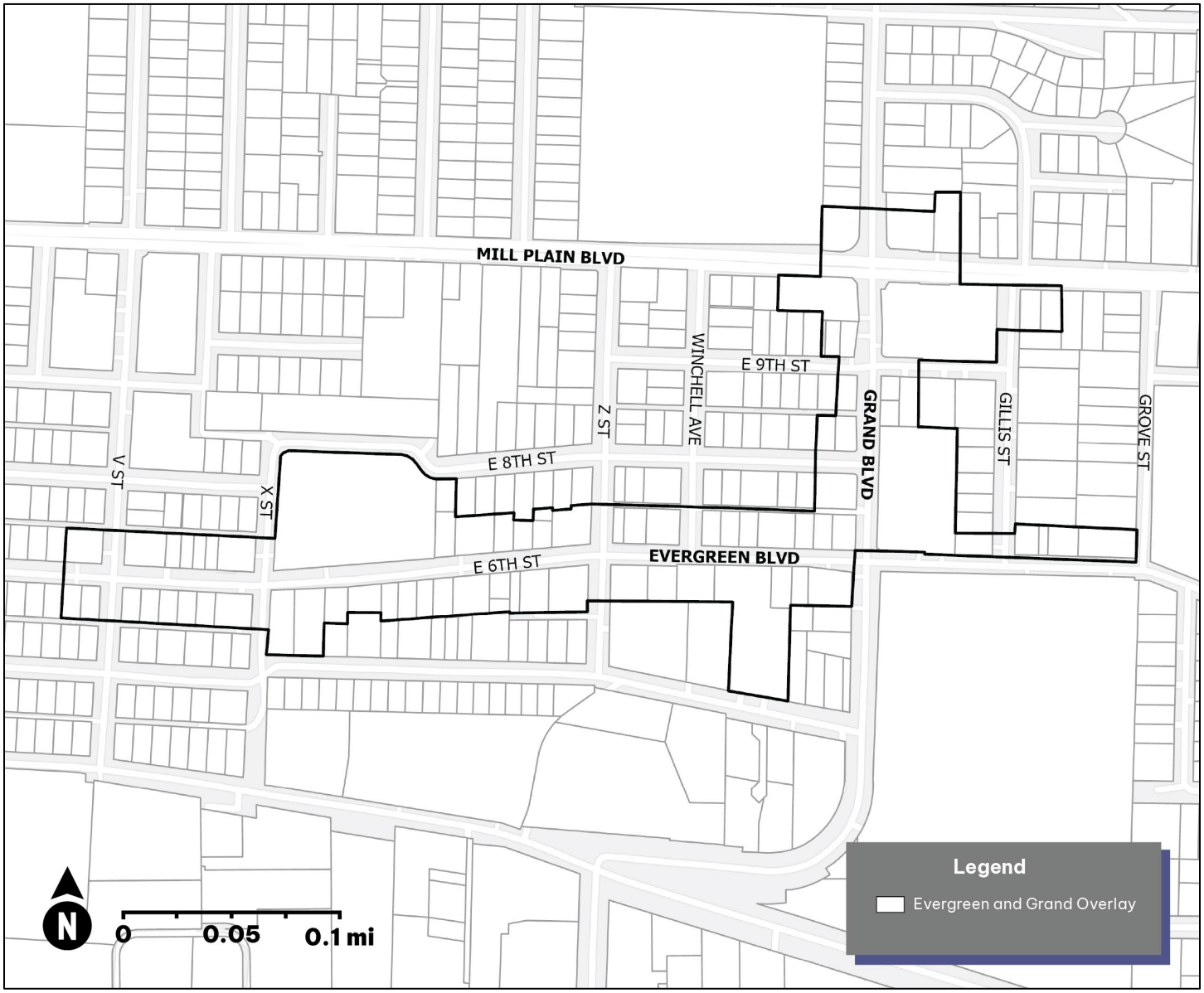
20.630.010 Purpose.

Purpose. East Evergreen and Grand Boulevards are locally-oriented corridors that boast an emerging small business district, have a unique character with smaller-scale buildings oriented to the street, and are located in an area adjacent to established neighborhoods. In 2022, the City Council adopted the Evergreen and Grand Commercial Corridors Strategy to guide future development in the corridors. The Strategy outlines a vision for an equitable and diverse corridor that is vibrant, sustainable and mixed use, and that recognizes and builds on the neighborhoods unique setting, history and character

20.630.020 Evergreen and Grand Commercial Plan Area.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.630.020-1.

FIGURE 20.630.020-1: EVERGREEN AND GRAND COMMERCIAL PLAN AREA



20.630.030 Plan Documents.

Developments within the Central Park Plan Area shall substantially comply with the following plan documents:

A. Evergreen and Grand Commercial Corridors Strategy

B. Evergreen and Grand Commercial Corridors Strategy Appendices

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CHAPTER 20.640
FOURTH PLAIN SUBAREA PLAN

Sections:

20.640.010 Purpose.

20.640.020 Fourth Plain Plan Area.

20.640.030 Plan Documents.

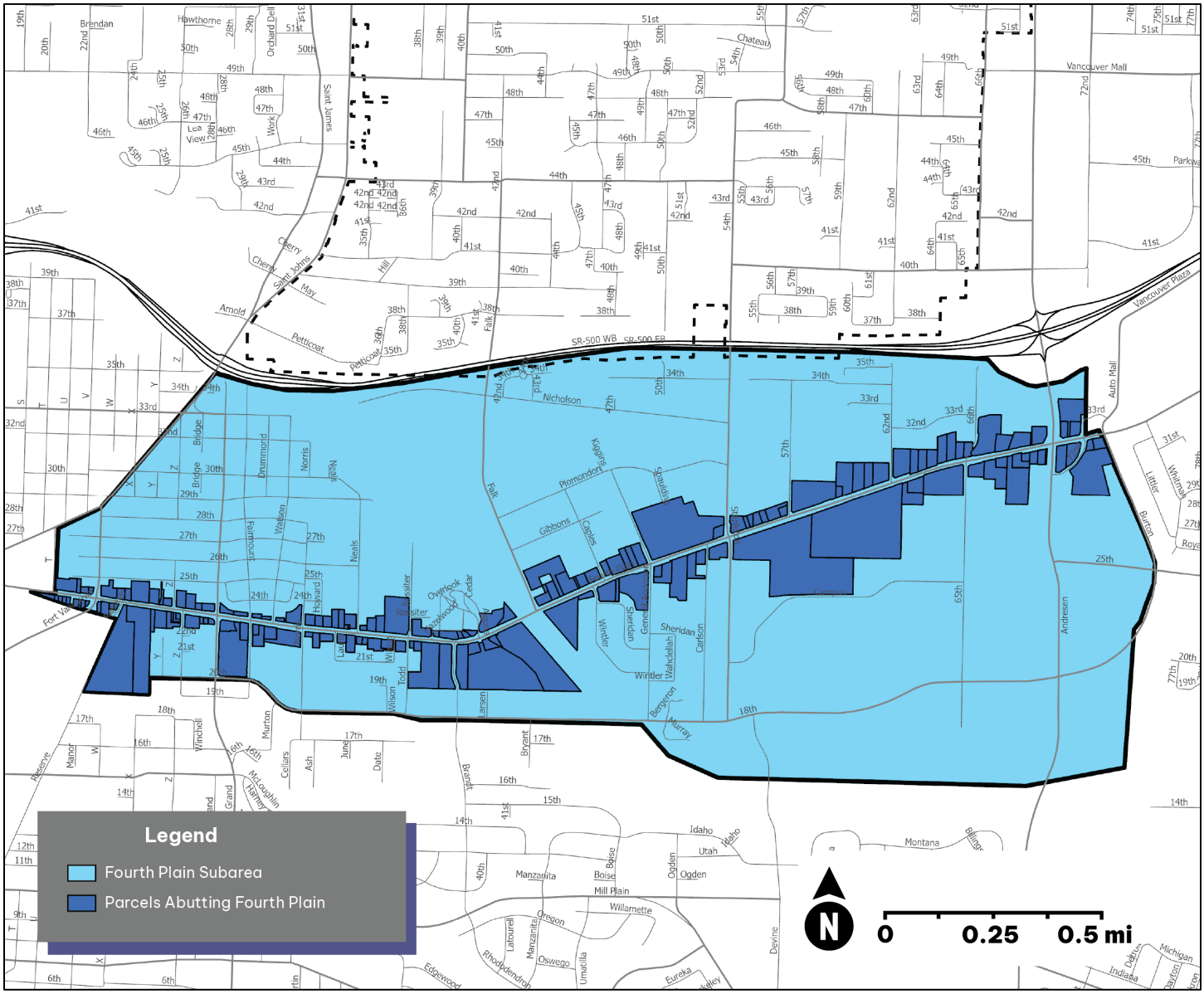
20.640.010 Purpose.

Purpose. The Fourth Plain Corridor Subarea was created to facilitate the transition of the corridor to an attractive, consistent, and pedestrian-friendly streetscape that accommodates multiple modes of transportation, and supports long term economic development.

20.640.020 Fourth Plain Plan Area.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.640.020-1.

FIGURE 20.640.020-1: FOURTH PLAIN PLAN AREA



20.640.030 Plan Documents.

Developments within the Fourth Plain Plan Area shall substantially comply with the following plan documents:

A. Fourth Plain Subarea Plan

B. Fourth Plain Streetscape Report and Appendix

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CHAPTER 20.650
FRUIT VALLEY SUBAREA PLAN

Sections:

20.650.010 Purpose.

20.650.020 Fourth Plain Plan Area.

20.650.030 Plan Documents.

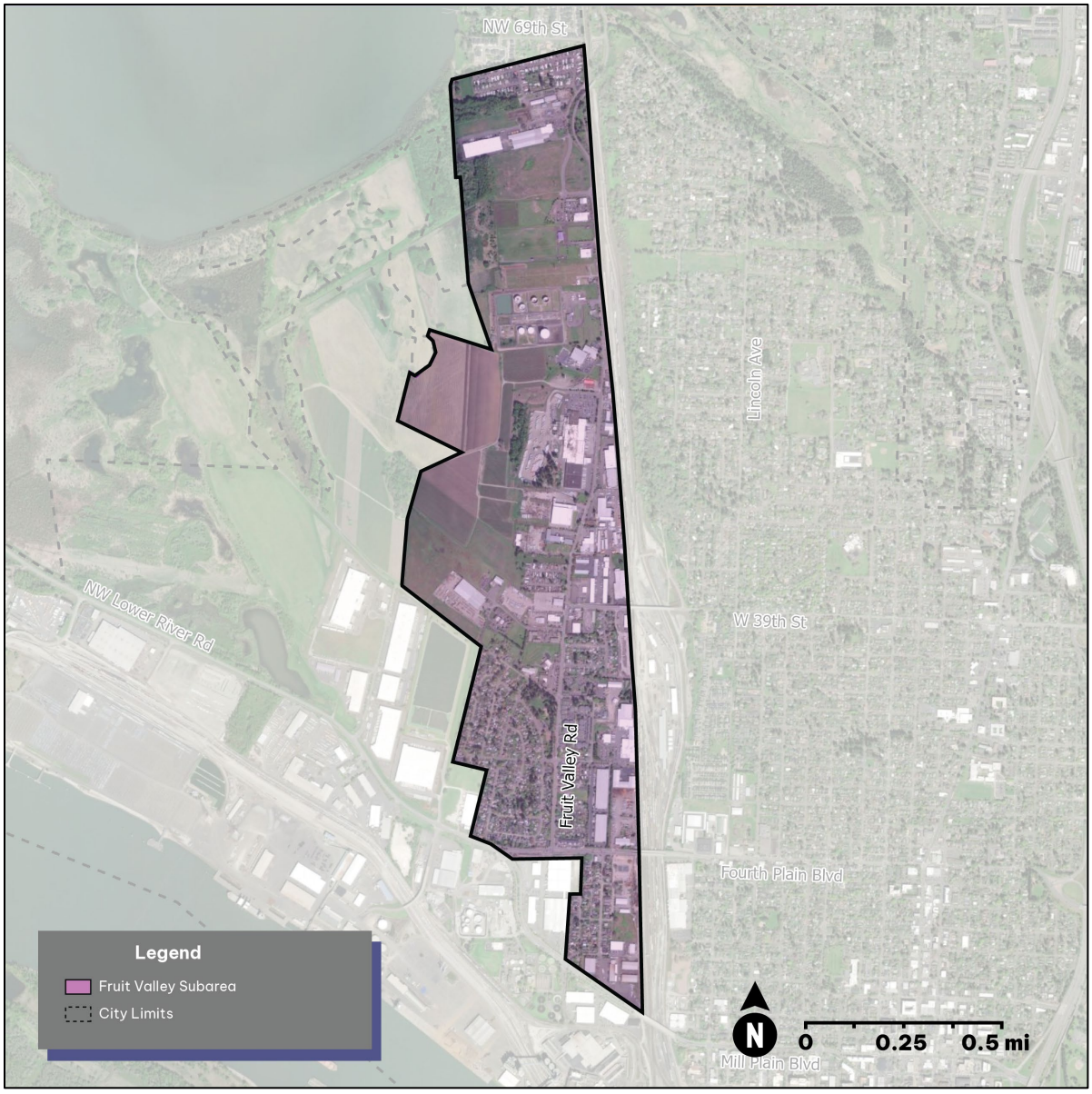
20.650.010 Purpose.

Purpose. The Fruit Valley Subarea Plan was created to facilitate a clean pleasant environment welcomes residents, businesses, employees and visitors; neighbors conveniently access goods and services; industry, businesses, and neighborhoods coexist and prosper; new micro businesses develop; safe inviting places for people to play, walk and ride bicycles are plentiful; the original shipyard housing character retains its historic charm; and an interconnected park, trails and open space system allows for recreation and mobility.

20.650.020 Fruit Valley Plan Area.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.650.020-1.

FIGURE 20.650.020-1: FRUIT VALLEY PLAN AREA



20.650.030 Plan Documents.

Developments within the Fruit Valley Subarea Plan area shall substantially comply with the following plan documents:

A. Fruit Valley Subarea Plan

B. Concept – getting better connected

C. Fruit Valley Design Handbook

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CHAPTER 20.660
RIVERVIEW GATEWAY SUBAREA PLAN

Sections:

20.660.010 Purpose.

20.660.020 Riverview Gateway Subarea.

20.660.030 Plan Documents.

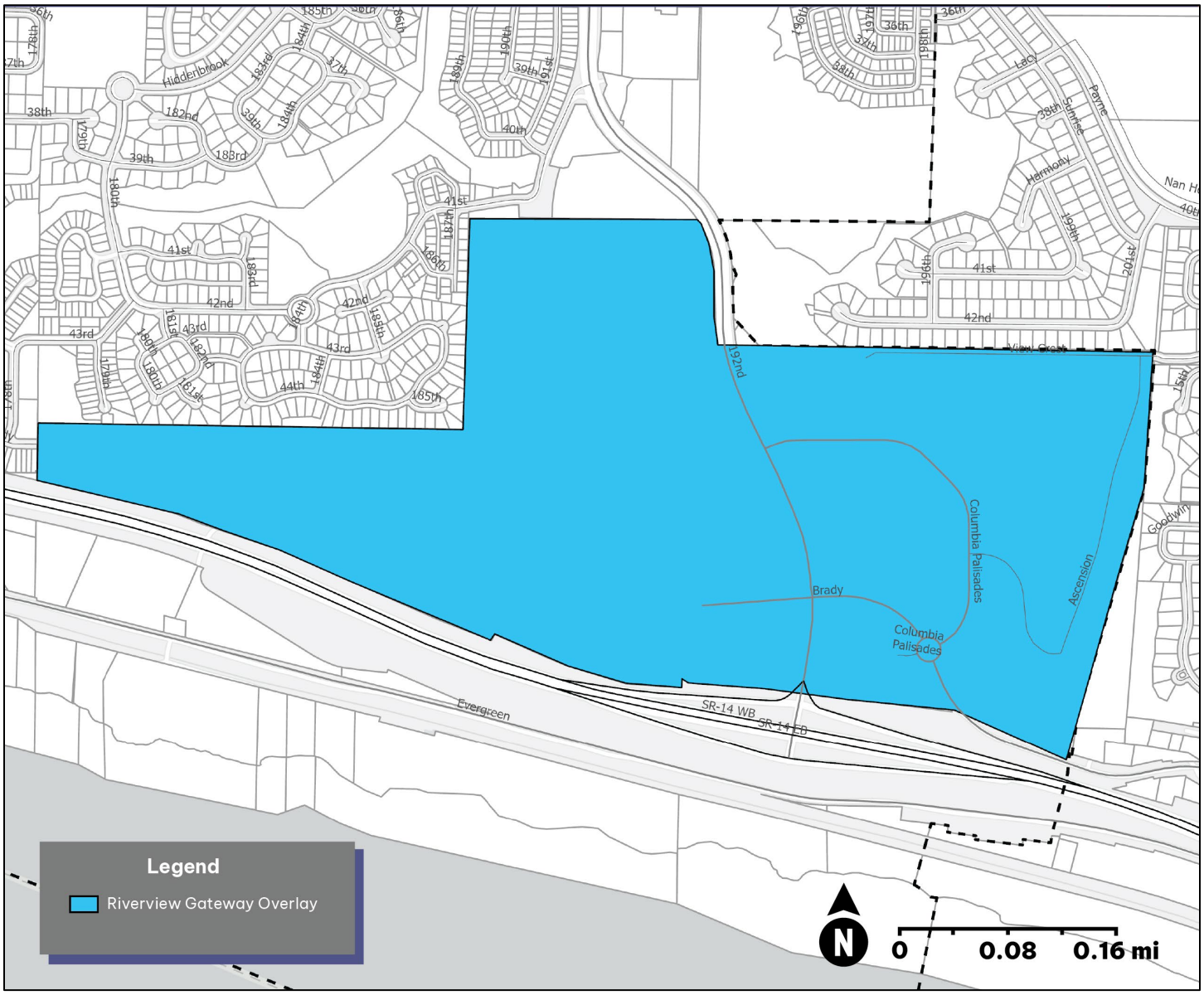
20.660.010 Purpose.

This chapter is intended to guide private development in a way that can help realize the community's vision for the Riverview Gateway quarry areas; provide clear objectives for those embarking on the planning or design of projects in the quarry areas; and ensure that each project fits with its neighbors and into the subarea.

20.660.020 Riverview Gateway Subarea.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.660.020-1.

FIGURE 20.660.020-1: RIVERVIEW GATEWAY SUBAREA



20.660.030 Plan Documents.

Developments within the Riverview Gateway Subarea shall substantially comply with the following plan documents:

A. Riverview Gateway Subarea Plan

B. Riverview Gateway Design Guidelines

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CHAPTER 20.670
SECTION 30 SUBAREA PLAN

Sections:

20.670.010 Purpose.

20.670.020 Section 30 Subarea.

20.670.030 Plan Documents.

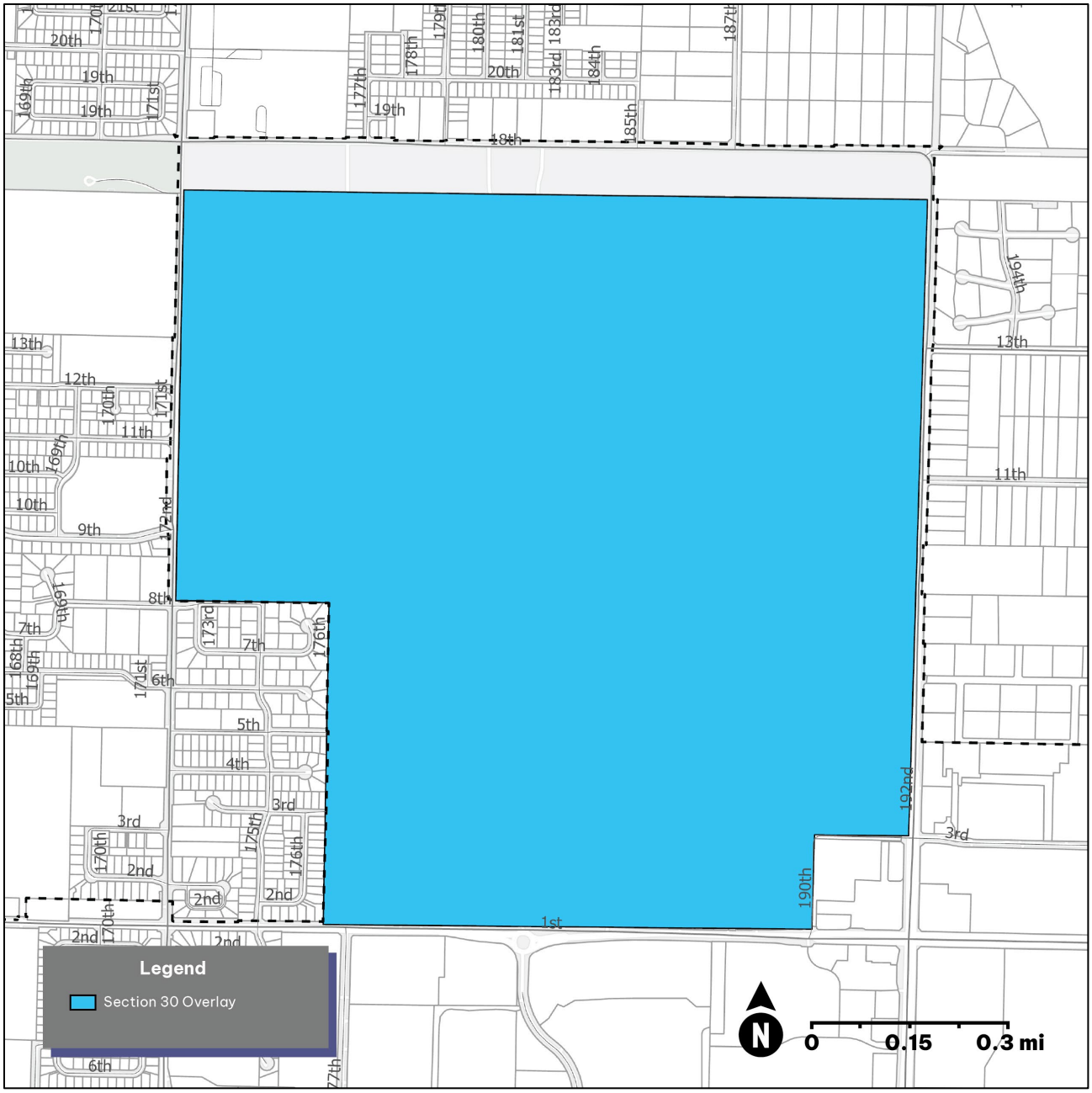
20.670.010 Purpose.

The Section 30 Employment Center Plan District (Plan District) intends to promote and guide private development as directed by the vision, goals, and policies of the adopted Section 30 Employment Center Plan; provide clear objectives for those proposing to develop in the Section 30 Plan area; maintain and enhance property values; promote economic provision of public services; and ensure that each development or project fits with its neighbors and within the Subarea.

20.670.020 Section 30 Subarea.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.670.020-1.

FIGURE 20.670.020-1: SECTION 30 SUBAREA



20.670.030 Plan Documents.

Developments within the Section 30 Subarea shall substantially comply with the following plan documents:

A. Section 30 Subarea Plan

B. Section 30 Design Guidelines

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CHAPTER 20.680
THE HEIGHTS SUBAREA PLAN

Sections:

20.680.010 Purpose.

20.680.020 The Heights Subarea.

20.680.030 Plan Documents.

20.680.010 Purpose.

The Heights District is envisioned as a vibrant neighborhood center that is sustainable, healthy, equitable, accessible and safe, and includes a mix of complementary uses, engaging public open space, diverse housing affordable to a wide range of community members and safe multimodal travel opportunities within the district and to transit and nearby neighborhoods. The purpose of the Heights Mixed Use Plan District is to implement the vision, goals, and policies of the Heights District Plan, and ensure future development is integrated, cohesive, context sensitive and contributes to the overall district vision.

20.680.020. The Heights Subarea.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.680.020-1.

FIGURE 20.680.020-1: THE HEIGHTS SUBAREA



20.680.030 Plan Documents.

Developments within The Heights Subarea shall substantially comply with the following plan documents, where there is a conflict between the guidelines and the standards, the standards shall be followed:

A. Heights District Plan

B. Heights District Appendices

C. Heights District Plan, Final Environmental Impact Statement

D. Heights District Urban Design Guidelines

E. Heights District Stormwater and Urban Forestry Guidance Document

F. Heights District Native and Adaptive Plan Species List

G. Heights District Equitable Development Plan

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CHAPTER 20.690
CITY CENTER SUBAREA PLAN

Sections:

20.690.010 Purpose.

20.690.020 City Center Subarea.

20.690.030 Plan Documents.

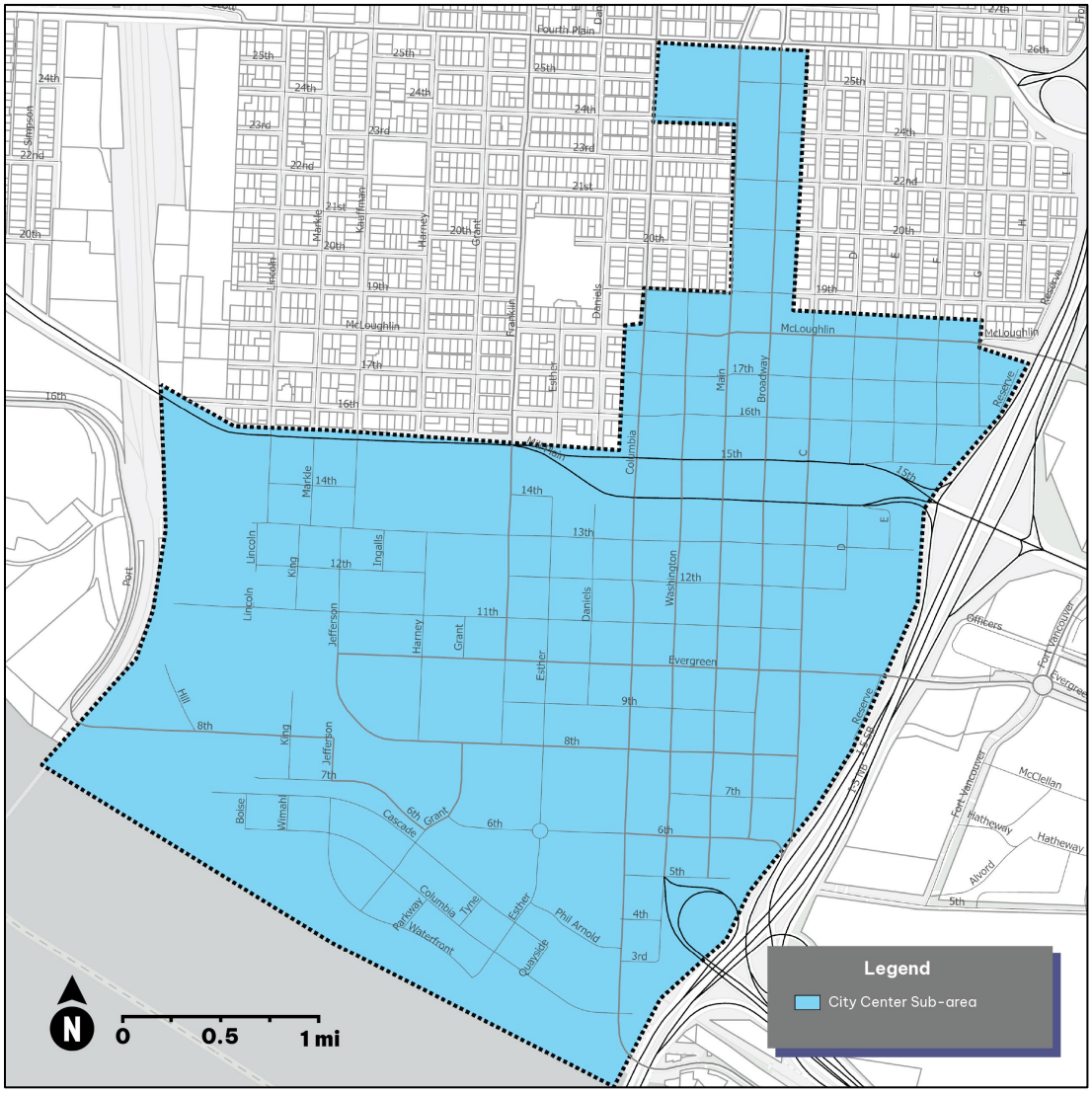
20.690.010 Purpose.

Many of the components of a successful city center are already in place in Vancouver, such as new housing, offices and retail in the Waterfront redevelopment area, strong pedestrian connections and public spaces, and mix of local businesses along Main Street and near Esther Short Park. The vision that is articulated in the VCCV plan is to cultivate a diversity of new uses that will complement those that exist and, at the same time, serve the resident, working and visiting populations in and adjoining the city center.

20.690.020 City Center Subarea.

Establishment of Boundaries. The plan area is defined as illustrated in Figure 20.690.020-1.

FIGURE 20.690.020-1: CITY CENTER SUBAREA



20.690.030 Plan Documents.

Developments within City Center Subarea shall substantially comply with the following plan documents:

A. City Center Subarea Plan

B. City Center Supplemental Environmental Impact Statement

C. City Center SEIS Appendix

D. City Center Parking Plan

E. Uptown Village Parking Plan

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20.700
ENVIRONMENTAL REGULATIONS

Sections:

20.710 Archaeological Resource Protection.

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CHAPTER 20.710
ARCHAEOLOGICAL RESOURCE PROTECTION

Sections:

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20.710.010 Purpose.

The purposes of this Chapter are to:

A. *Identify and preserve resources.* Encourage the identification and preservation of cultural, archaeological, and historic resources consistent with the Growth Management Act of 1990, as amended, and Vancouver' s Comprehensive Plan, Visions for the Vancouver Urban Area.

B. *Establish procedures and standards.* Establish clear procedures and specific standards for identifying, documenting, and preserving Vancouver's cultural, archaeological, and historic resources.

C. *Use the best technology and techniques.* Ensure use of the best available technology and techniques commonly accepted as standards in the profession of archaeology for identification and preservation of cultural, archaeological, and historic resources.

D. *Balance preservation and development.* Establish a fair and equitable process for balancing the need for identification and preservation of cultural, archaeological, and historic resources with land development.

E. *Provide coordination and consistency.* Ensure coordination and consistency in the implementation of the State Environmental Policy Act, the Shoreline Management Act, the Growth Management Act, RCW Chapters 27.34, 27.44, 27.48, and 27.53, and associated regulations.

20.710.020 Applicability.

A. *Universal.* Notwithstanding subsections B and C of this section, the provisions of this chapter shall apply:

1. When any item of archaeological interest is discovered during the course of a permitted ground-disturbing action or activity (VMC 20.710.090).
2. When the Planning Official determines that reliable and credible information indicates the probable existence of an archaeological site in a disturbance area for which an application for a permit or approval for a ground-disturbing action or activity has been submitted to the Planning Official.

B. *General.* The provisions of this chapter shall apply to all applications for ground-disturbing actions or activities for which a permit or approval is required:

1. Where any portion of the disturbance area is within properties with predictive model probability level high.
2. Where the disturbance area is at least five acres in size and wholly within predictive model probability levels moderate-high and moderate.
3. Regardless of disturbance area size or predictive model probability level, when the disturbance area is within one-quarter mile of a known, recorded archaeological site as measured on a horizontal plane extending in all directions. (See subsection (C)(11) of this section for a possible exemption.)

C. *Exemptions.* Applications for the following permits, approvals or other ground-disturbing activities shall be exempt from the provisions of this chapter, except where the provisions of subsection A of this section apply:

1. Land use permits handled as Type 1 actions under VMC 20.210.040, except grading and tree removal permits; or
2. Sign permits (Chapter 20.450.050 VMC); or
3. Conditional use permits (Chapter 20.245 VMC) for a change in use only, not involving ground disturbance for structural modification.
4. Zoning variance approvals (Chapter 20.290 VMC).

5. Ground-disturbing actions or activities classified as exempt actions under VMC 20.210.030 except landscaping activities and single-family and duplex dwellings not requiring an environmental review; or
6. Ground-disturbing actions or activities where the Planning Official determines that the disturbance area was adequately investigated and documented [VMC 20.710.050(A)] in the past and the existence of an archaeological site was determined not to be probable (prior predetermination) or not to be actual (prior survey); or
7. Applications for permits or approvals for ground-disturbing actions or activities which have vested prior to the effective date of this chapter; or
8. Ground-disturbing actions or activities where the provisions of this chapter were previously applied to a related application for a larger, more comprehensive ground-disturbing action or activity which encompasses the scope of the current application; or
9. Ground-disturbing actions or activities where a prior application for a larger, more comprehensive ground-disturbing action or activity which encompasses the scope of the current application was exempt from the provisions of this chapter pursuant to this subsection C; or
10. Ground-disturbing actions or activities where the disturbance area is within one-quarter mile of a known, recorded archaeological site as measured on a horizontal plane extending in all directions may be exempted by the Planning Official when appropriate due to the effects of a geographic barrier; or
11. Ground-disturbing actions or activities proposed in areas in which the Planning Official determines that previous substantial disturbance has been documented.

D. *Predictive Model Application.* When more than one predictive model probability level traverses a disturbance area, the entire disturbance area shall be considered to be within the level with the greatest probability rating.

E. *Coordination*.

1. Where the provisions of this chapter conflict with each other or with other local, state, or federal laws, ordinances, or programs, the more restrictive provisions shall apply.
2. The provisions of this chapter shall apply throughout the city, including areas regulated by Vancouver's Shoreline Management Master Program.
3. The regulations of the State Environmental Policy Act SEPA shall supplement the provisions of this chapter.
4. The provisions of this chapter are intended to coordinate with and supplement the related provisions of state law. [Chapters 27.34, 27.44, 27.48, and 27.53 RCW.]

20.710.030 Development Review Applications.

A. A development application shall not be determined counter complete until any required predetermination has been completed and the predetermination report has been submitted to the Planning Official.

B. All documents pertaining to archaeology reviews shall be exempt from any public disclosure requests [RCW 27.53.070].

20.710.040 DAHP Coordination and Permitting.

A. *Recording.* Any archaeological site identified pursuant to the provisions of this Chapter shall be recorded with the Washington State Department of Archaeology and Historic Preservation (DAHP). A copy of the State of Washington Archaeological Site Inventory form and cover letter to DAHP shall be submitted to the Planning Official with the required survey report VMC 20.710.080 (C).

B. *Permit required.* A permit from DAHP shall be secured prior to digging, altering, excavating, and/or removing archaeological objects and sites or historic archaeological resources, or removing glyptic or painted records of tribes or peoples, or archaeological resources from native American Indian cairns or graves (WAC 25-48-050, as amended).

20.710.050 Documentation and Peer Review.

A. *Documentation.* Archaeological sites shall be adequately investigated and documented. For purposes of this chapter, adequately investigated and documented shall mean that (1) the investigation method, level of analysis, and area covered are sufficient to meet the requirements of VMC 20.710.070 and VMC 20.710.080, as appropriate; and (2) the documentation is sufficient to allow another archaeologist to repeat the investigation and reach a similar conclusion. Adequacy shall be determined by the Planning Official.

B. *When and how to use the peer review process.* In the event that there is substantive disagreement of a technical nature between archaeologists concerning an application subject to the provisions of this Chapter, either the Planning Official or the applicant may invoke the peer review process outlined by the US Department of the Interior, National Park Service September, 1993 publication, "The Peer Review of Public Archaeology Projects: A Procedure Developed by the Departmental Consulting Archaeologist" authored by Bennie C. Keel (ISSN 1057-1574) to resolve the issue. The party who invokes the peer review process shall bear the costs of the proceedings. The applicant and the City shall each appoint one, and together shall agree on the appointment of a third archaeologist to serve on the Peer Review Panel.

20.710.060 Tribal Notification.

A. *Tribal registration.* Any Tribe may register to receive notification of required archaeological resource surveys. Such registration shall be in writing, be addressed to the Planning Official, and include the name of the Tribe and the name, title, and mailing address of the designated representative to whom the notice is to be provided.

B. *Updating registration.* It is the responsibility of the Tribe to ensure that this registration information is updated by notifying the Planning Official in writing of any change.

C. *Notification.* Where the Planning Official determines that the existence of an archaeological site is probable and an archaeological resource survey is required (VMC 20.710.080), the Planning Official shall notify the Tribes which have registered with the City of such determination by certified mail, return receipt requested. The Planning Official shall accept comments from registered Tribes for fourteen calendar days from the date the notification was received by the Tribes.

20.710.070 Predetermination Process.

A. *Predetermination required.* A predetermination is an archaeological study similar to, but of less intensity and lower cost than, an archaeological resource survey. Its purpose is to determine whether the existence of an archaeological site within a disturbance area is probable. A predetermination is required as follows:

1. For any nonexempt ground-disturbing action or activity for which a permit or approval is required where any portion of the disturbance area is at least partially within predictive model probability level high.

2. For any nonexempt ground-disturbing action or activity for which a permit or approval is required and where the disturbance area is at least five acres in size and wholly within predictive model probability levels moderate-high and moderate.

3. For any nonexempt ground-disturbing action or activity for which a permit or approval is required where the disturbance area is proposed within one-quarter mile of a known, recorded archaeological site.

4. When the planning official determines that reliable and credible information indicates the probable existence of an archaeological site in a disturbance area for which an application for a permit or approval for a ground-disturbing action or activity has been submitted to the planning official.

5. When any item of archaeological interest is discovered during the course of a permitted or approved ground-disturbing action or activity (VMC 20.710.090).

B. *Waiver.* The Planning Official may waive the requirement for a predetermination where the applicant chooses to provide a survey in accordance with the provisions of this chapter instead of a predetermination.

C. *Preapplication review.* The Planning Official may review a predetermination report and issue a determination of the likelihood that archaeological resources exist prior to the submittal of an application for a permit or approval for a ground-disturbing action or activity subject to the provisions of this chapter. Such preapplication review shall require permission for the Planning Official to enter and inspect the property.

D. *Predetermination standards.* Predeterminations shall include at a minimum the following elements and be carried out according to the following minimum standards:

1. Predeterminations shall be performed by a professional archaeologist. Documentation shall be sufficient to allow another archaeologist to repeat the investigation and reach a similar conclusion. Adequacy shall be determined by the Planning Official.

2. Predeterminations shall be performed in accordance with the best available technology and techniques commonly accepted as standards in the profession of archaeology.

3. No artifacts shall be collected during a predetermination.

4. A thorough review of records, documentation, maps, and other pertinent literature shall be performed.

5. A visual inspection of the ground surface shall be completed when conditions yield at least 50 percent visibility of the soil. When conditions yield less than 50 percent visibility of the soil, subsurface investigation shall be required in accordance with subsection (D)(6) of this section.

6. Subsurface investigation shall be conducted as follows:

    a. Subsurface investigation shall be performed:

        i. When conditions yield less than 50 percent visibility of the soil; or

        ii. When otherwise considered necessary by the archaeologist.

    b. When performed, the following standards shall apply:

        i. Subsurface probes shall be no less than eight inches/20 centimeters in diameter (12 inches/30 centimeters or more preferred) at the ground surface, no less than eight inches/20 centimeters in diameter at the base, and shall delve no less than 20 inches/50 centimeters deep into natural soil deposits whenever possible.

        ii. The most appropriate number of and locations for subsurface probes shall be determined by the archaeologist.

iii. All material excavated by subsurface probes shall be screened using both one-quarter-inch and one-eighth-inch hardware mesh cloths or equivalent.

E. *Predetermination reports.* A report shall be completed for each predetermination in accordance with subsection D of this section on standardized reporting forms furnished by the department.

F. *Review of predetermination reports and further action*.

1. Predetermination reports shall be reviewed by the Planning Official.

2. Upon finding that a predetermination report is complete and adequate, the Planning Official shall evaluate the report and determine whether an archaeological site is likely to exist.

a. Where the director determines that the existence of an archaeological site is not probable, the application may proceed through the remainder of the development review process.

b. Where the Planning Official determines that the existence of an archaeological site is probable, an archaeological resource survey shall be required and carried out in accordance with the provisions of this chapter.

c. Where the Planning Official determines that the existence of an archaeological site is probable and an archaeological resource survey is required, the Planning Official shall notify registered tribes of such determination in accordance with the provisions of VMC 20.710.150.

20.710.080 Archaeological Resource Survey Process.

A. *Purpose.* The purpose of an archaeological resource survey is to determine whether an archaeological site actually does exist in a disturbance area, and to make a preliminary assessment of the potential significance of such a site. Surveys are to be conducted under the following circumstances:

1. A survey shall be required when the results of a predetermination indicate further investigation is necessary [VMC 20.710.070(F)] and either:

a. No previous survey has been done; or

b. A previous survey or documentation is determined by the Planning Official to be inadequate (20.710.050A VMC).

2. An applicant may choose to provide a survey instead of a required predetermination [VMC 20.710.070(B)].

B. *Survey standards.* Surveys shall include at a minimum the following elements and be carried out according to the following minimum standards:

1. Surveys shall be performed by a professional archaeologist. Documentation shall be sufficient to allow another archaeologist to repeat the investigation and reach a similar conclusion. Adequacy shall be determined by the Planning Official.

2. Surveys shall be performed in accordance with the best available technology and techniques commonly accepted as standards in the profession of archaeology.
3. Artifacts may be collected during a survey only after consultation with DAHP.
4. A thorough review of records, documentation, and other pertinent literature shall be performed.
5. A systematic, 100% visual inspection of the ground surface shall be completed when conditions yield at least 50% visibility of the soil.
6. Subsurface probes shall be required for all surveys as follows:
    a. Subsurface probes shall be no less than 8in/20cm in diameter (12in/30cm or more preferred) at the ground surface, no less than 8in/20cm in diameter at the base, and delve no less than 20in/50cm deep into natural soil deposits whenever possible.
    b. No less than 4 subsurface probes per acre shall be required. For fractions of an acre, no less than one subsurface probe shall be required for each quarter acre. (For example, on a parcel of 2.33 acres, no less than (2x4) + 1 = 9 subsurface probes would be required.)
    c. The most appropriate locations for the subsurface probes shall be determined by the archaeologist.
    d. All material excavated by subsurface probes shall be screened using both 1/4-inch and 1/8-inch hardware mesh cloths or equivalent.

C. *Survey reports.* A report shall be completed for each survey in accordance with VMC 20.710.080(A)(1) and state guidelines. Survey reports shall be submitted to the Planning Official and filed with DAHP. When an archaeological site is identified, the State of Washington Archaeological Site Inventory form shall be submitted to DAHP with the survey report [VMC 20.710.040(A)]

D. *Review of survey reports and further action*.

1. Survey reports shall be filed with DAHP.
2. Survey reports shall be reviewed by the Planning Official. Upon finding a survey report complete and adequate, the Planning Official shall determine whether an archaeological site has been identified. [20.710.070(F)]
3. Where the Planning Official determines that no archaeological site has been identified, the application may proceed through the remainder of the development review process.
4. Where the Planning Official determines that an archaeological site has been identified, the Planning Official shall determine whether the site is likely to be potentially significant in accordance with the significance criteria of VMC 20.710.080(E) and in consultation with DAHP.

5. Where the Planning Official determines that an archaeological site has been identified and is not likely to be potentially significant, the application may proceed through the remainder of the development review process.
6. Where the Planning Official determines that an archaeological site has been identified and is likely to be potentially significant, archaeological resources shall be further evaluated, avoided, properly mitigated, or properly recovered in accordance with the Planning Official's recommendation and the terms of any necessary permit from DAHP [VMC 20.710.040(B)]. Priority for thorough evaluation and data recovery shall be given to potentially significant archaeological sites. Monitoring and future corrective measures may be required to ensure that an archaeological site is not degraded by a permitted development.
7. Where sites are to be avoided, the Planning Official shall require that appropriate land use restrictions be recorded using a proper legal instrument.
8. An escrow or bond shall be required of the applicant to ensure that the site is treated in accordance with the Planning Official's recommendation and provisions of the state permit.

E. *Significance criteria.* A potential significant archaeological site is a site which (1) contains archaeological objects at a density of at least 100 per cubic meter per stratigraphic or cultural unit; or (2) includes at least one feature; or (3) includes at least one relatively uncommon archaeological object; or (4) contains skeletal remains; or (5) is otherwise considered potentially significant by the archaeologist.

20.710.090 Discovery Principle.

Uncovering archaeological items. In the event that any item of archaeological interest is uncovered during the course of a permitted or approved ground-disturbing action or activity:

A. *Cessation of activity.* All ground-disturbing activity shall immediately cease.

B. *Notification.* The applicant shall immediately notify the Planning Official and DAHP.

C. *Predetermination report and determination.* The applicant shall provide for a predetermination and a predetermination report prepared in accordance with the provisions of this Chapter. The Planning Official shall review the report and issue a determination in accordance with 20.710.070(F) VMC in a reasonably diligent manner, taking into account all pertinent factors and conditions. Where such determination is that the existence of an archaeological site is not probable, construction may continue. Where such determination is that the existence of an archaeological site is probable, the applicant shall provide a survey and survey report, in accordance with the provisions of this Chapter. The Planning Official shall produce a map of the parcel indicating clearly the portion(s) of the parcel, if any, within which construction may continue under the supervision of a professional archaeologist and monitoring by the Planning Official while the required survey is being completed. The provisions of 20.710.080(D) VMC shall apply.

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CHAPTER 20.720
CRITICAL AREAS PROTECTION

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20.720.010 Purpose.

The purpose of this chapter is to designate and protect critical areas and their functions and values, while also allowing reasonable use of property.

A. Critical areas are ecologically sensitive and hazardous areas and protecting them or mitigating any impacts to them is important for protection of the environment and quality of life for the citizens of Vancouver, and is mandated by the Washington Growth Management Act (GMA) (Chapter 36.70A RCW). The GMA requires cities and counties to develop critical area regulations based on best available science. All regulations included herein have been developed in response to best available science at the time of adoption.

B. This chapter provides protection for the following critical areas: wetlands, fish and wildlife habitat conservation areas, geologically hazardous areas, and frequently flooded areas. Critical aquifer recharge areas are covered in Chapter 14.26 VMC.

C. This chapter implements the goals and policies of the Vancouver Comprehensive Plan, under the GMA and other related state and federal laws.

20.720.020 General provisions.

A. *No Net Loss of Functions.* Development activity shall result in no net loss of the functions and values of critical areas. The beneficial functions provided by each type of critical area include, but are not limited to:

1. *Fish and Wildlife Habitat Conservation Areas.* Providing habitat for breeding, rearing, foraging, protection and escape, migration, and overwintering; and providing complexity of physical structure, supporting biological diversity, regulating stormwater runoff and infiltration, providing wave attenuation, removing pollutants from water, and maintaining appropriate water temperatures.

2. *Frequently Flooded Areas.* Providing flood storage, conveyance, and attenuation of flood waters; minimizing the amount of development at risk in such areas to protect human life and safety, including reducing damage to homes, places of business, public facilities, and utilities; and minimizing business interruptions.

3. *Geologic Hazard Areas.* Providing erosion control and protecting public safety, including people, structures, and infrastructure, from damage during seismic events, landslides, significant erosion, debris flows, and rock falls.

4. *Wetlands.* Providing carbon sequestration, cleansing surface water, storing and conveying floodwater, and providing fish and wildlife habitat.

B. *Temporary and Permanent Markers and Signs.* With the exception of frequently flooded areas and seismic hazard areas, temporary and permanent markers and signs shall be installed for critical areas as follows:

1. *Temporary Sign Requirements.* The location of the outer perimeter of the critical area(s) and buffer(s) shall be marked in the field and approved by the Planning Official prior to the commencement of permitted activities and maintained throughout the duration of the construction.

2. *Permanent Sign Requirements.*

a. A permanent physical demarcation along the outer/upland boundary of the critical area buffer(s) shall be installed and thereafter maintained. Such demarcation may consist of fencing, hedging, or other prominent physical marking that allows wildlife passage, blends with the critical area environment, and is approved by the Planning Official. If the function and values of the critical area would be degraded by the existing or proposed activity, such as the presence of grazing animals, a fence shall be erected and maintained.

b. Permanent signs are posted at intervals of one every 50 feet, or, if this interval cannot be met, an interval of one per lot for six units or less or at a maximum interval of 200 feet, or as otherwise determined by the Planning Official, and must be perpetually maintained by the property owner. The sign shall be worded as follows or with alternative language approved by the Planning Official: "The area beyond this sign is a critical area or critical area buffer. Alteration or disturbance is prohibited by law. Please call the City of Vancouver for more information."

3. *Applicability.* Applicants will be responsible for signage and demarcation within land that falls on the subject property(ies) included within the application for a critical areas permit.

4. Additional standards for temporary and permanent marking of geologic hazards are contained in VMC 20.720.130.

C. *Relationship to Other Regulations*.

1. The critical areas regulations apply in addition to zoning and other regulations adopted by the city.

2. When more than one critical area is located on a project site, regulations protecting each critical area apply to the site. Where critical areas overlap (e.g., a wetland buffer and a riparian buffer), the most restrictive regulations that provide the most protection for the critical areas present establish the outer boundary of the regulated critical areas. Mitigation will be required for impacts to each critical area to ensure no net loss.

3. When there is a conflict between any provisions of this chapter and any other regulations, the requirement that provides the most protection to the critical area(s) applies.

4. Compliance with the provisions of this chapter does not constitute compliance with other federal, state, and local regulations and permit requirements. The applicant is responsible for complying with other state and federal requirements in addition to the requirements of this chapter.

D. *Jurisdiction.* All areas within the city meeting the definitions within Chapter 20.150 VMC and descriptions within subsection A of this section of one or more critical areas and their buffers, whether mapped or not, are hereby designated critical areas and are subject to the provisions of this chapter.

E. *Warning and Disclaimer of Liability.* Critical areas development should be based on sound scientific and engineering considerations that may be more stringent than those presented in this chapter. The city assumes no liability if these established standards prove to be insufficient protection of property or the environment.

20.720.030 Applicability and exemptions from requirement to obtain permit.

A. *Applicability.* No person, company, agency, or applicant shall alter a critical area or buffer except as consistent with the requirements of this chapter, whether or not a permit is required.

B. *Statements of Exemption Process.* For activities listed in subsection (C)(1) of this section, a written statement of exemption from the requirement to obtain a critical areas permit is required prior to undertaking the activity. Activities listed in subsection (C)(2) of this section do not require a statement of exemption. Those seeking an exemption under this chapter are required to demonstrate compliance with the mitigation sequence outlined in VMC 20.720.060.

1. Exempt activities are not required to obtain a critical areas permit. However, all activities in critical areas, including exempt activities, are subject to the policies and regulations of this chapter. If a land use permit is not required, the Planning Official may attach conditions to building and engineering permits, as necessary, to enforce the provisions of this chapter.

2. The request for the statement of exemption shall be in writing, on forms required by the planning official, and include the information required by the Planning Official. Statements of exemption shall be processed as a Type I procedure per Chapter 20.210 VMC, Decision Making Procedures.

C. *Exemptions from Requirement to Obtain a Critical Areas Permit*.

1. Activities requiring a Statement of Exemption.

a. *Existing Structure Remodel – Impervious Surface Increase of 200 Square Feet or Less.* Development or clearing inside a critical area or buffer as necessary to remodel an existing structure, provided:

i The activity will increase the footprint of structures with impervious surfaces by a maximum of 200 square feet cumulatively;

ii The distance from the nearest structure or impervious surface to a critical area is not decreased;

iii All native vegetation disturbed as a result of the development shall be replaced one-to-one, except that trees shall be replaced using tree units derived from Chapter 20.450.035 VMC, Landscaping and Tree Conservation. Native vegetation shall be used where feasible;

iv Impacts to critical areas and buffers shall be minimized and mitigated in accordance with the city's critical areas approval criteria; and

v No adverse impacts to priority Oregon white oak trees may result.

b. No Impervious Surface Increase in the Riparian Management Area (RMA) or Riparian Buffer (RB) and Located outside Frequently Flooded Areas. Development activity on a site within the footprint of existing structures or impervious surfaces that does not increase the impervious surface area in the RMA or RB, is not located in frequently flooded areas, and is not otherwise exempt under subsection B of this section shall be exempt from the provisions of VMC 20.720.110, Fish and Wildlife Habitat Conservation Areas.

The applicant is encouraged to provide enhancement to the extent feasible. Such enhancement activities may include, but are not limited to, landscaping using native plants, additional treatment of stormwater as appropriate, and implementation of best management practices (BMPs) that would enhance habitat functions.

c. *Approved Subarea Plan with EIS.* Development activity covered by and in compliance with all the conditions of an approved subarea plan that contains:

i Baseline information on existing critical areas and their functions at the level of detail required for an environmental impact statement (EIS) under the State Environmental Policy Act (SEPA);

ii An analysis of the impacts of full development at the level of detail required for an EIS under SEPA and in keeping with the plan; and

iii Mitigation for those impacts consistent with the requirements of this chapter.

d. *Fence.* A fence may be installed in a critical area buffer (not in a critical area) where:

i The fence is necessary for safety and security;

ii The property was developed prior to the effective date of this chapter (April 29, 2005); and/or

iii The fence is designed and installed in a manner that protects the critical area and buffer functions and blends with the critical area environment.

e. *On-site Critical Area Will Be Avoided.* Development may be permitted on a site containing a critical area or buffer when the Planning Official determines that impacts to critical areas and buffers will be avoided. In making this determination, the Planning Official shall utilize all of the procedures and criteria listed below to determine that the adverse impacts will be avoided.

i The critical area(s) and buffer(s) has/have been identified in the field, clearly mapped by a qualified professional, and documented by a limited-scope critical areas report (for example, a wetland boundary delineation without categorization or functional assessment, but with the minimum documentation necessary to justify the boundary location).

ii The site plan and preliminary plat show a development envelope that demonstrates that all activity will take place outside critical areas and buffers.

iii The boundaries of the development envelope are clearly outside of all maximum critical areas and all maximum buffers.

f. *Maintaining Fire-Defensible Space.* Maintaining fire-defensible space around a structure to reduce fire hazards, involving regular maintenance of existing trees at least six inches in diameter at breast height, grasses, and underbrush, not tree removal or other ground-disturbing or soil-destabilizing activities. Creating fire-defensible space or undertaking other development requires a critical areas permit per the critical areas approval process and could require other permits as well.

i Pruning trees, grasses, and brush within a critical area or buffer to maintain fire-defensible space around a structure may be permitted when one or more of the following criteria are met:

(A). The structure nearest the property line is within 30 feet of a slope of at least 25 percent (also designated as a landslide hazard area under this chapter);

(B). The nearest structure is within 30 feet of a forested area;

(C). The vegetation within 30 feet of the structure is comprised of less than 50 percent native species;

(D). The vegetation within 30 feet of the structure is higher than 12 inches;

(E). Trees are crowded within 30 feet of the structure or overhanging the structure's roof; or

(F). The structure is located in an area designated by the fire marshal as a "wildfire safety area."

ii When maintenance of a fire-defensible space is permitted, the following standards shall apply:

(A). Trees may be pruned or limbed-up to mitigate a hazard, but trees may not be removed without a critical areas permit and any other necessary permit(s).

(B). Topping trees is prohibited.

(C). Grasses and underbrush shall be maintained between eight and 12 inches in height.

(D). Any debris from pruning shall be disposed of promptly and properly.

g. *Development Located within Soil Erosion Hazard Areas Only.* When no other type of critical area, including other types of geologic hazards, is present, development within soil erosion hazard areas shall meet the requirements of Chapter 14.24 VMC, Erosion Control, including preparation of a stormwater report, if required. In addition, the applicant shall file a limited scope geotechnical report prepared by a qualified professional as defined by Chapter 20.150 VMC, which shall be provided to the Planning Official for review at the earlier of development application, engineering document review, or building permit review. Upon review of the limited scope geotechnical report, the Planning Official may exempt the development from the need for a critical areas permit.

h. *Development/Expansion of structure that contains six or less units with a Loss of a Single, Standalone Oregon white oak.* The loss of a single, standalone Oregon white oak tree that meets the WDFW PHS status (must not be part of a woodland that includes off-site trees) and in accordance with the definition listed in VMC 20.150.040D that is equal to or less than six inches dbh for the purpose of developing a structure with six or less units or expansion of an existing structure containing six or less units (does not include expansion of detached garages, outbuildings, accessory dwellings, decks, gardens, etc.).

2. *Activities for which a Statement of Exemption is not required.* Reasonable methods shall be used to avoid potential impacts to critical areas. Any damage to, or alteration of, a critical area that is not a necessary outcome of the exempt activity shall be corrected at the property owner's expense.

The following activities are exempt from needing a critical areas permit and do not require a statement of exemption:

a. *Emergencies.* Those activities necessary to prevent an immediate threat to public health, safety, or welfare, or that pose an immediate risk of property damage and that require remedial or preventative action in a time frame too short to allow for compliance with the requirements of this chapter, so long as all of the following apply:

i The emergency action uses reasonable methods to address the emergency.

ii The emergency action must have the minimum possible impact to the critical area or its buffer.

iii The property owner, person, or agency undertaking such action shall notify the city within 10 working days following commencement of the emergency activity.

iv Within 14 days, the planning official shall determine if the action taken was within the scope of the emergency actions allowed in this section. If the Planning Official determines that the action taken, or any part of the action taken, was beyond the scope of an allowed emergency action, then the critical areas enforcement provisions shall apply.

v After the emergency, the property owner, person or agency undertaking the action shall fully fund and conduct necessary restoration and/or mitigation for any impacts to the critical area and buffers resulting from the emergency action in accordance with an approved critical areas report and mitigation plan. The property owner, person or agency undertaking the action shall apply for review. The alteration, critical areas report, and mitigation plan shall be reviewed by the city in accordance with the review procedures contained in this chapter.

vi Restoration and/or mitigation activities must be initiated within three months of the date of an approved critical areas report and mitigation plan or as otherwise determined by the Planning Official and completed in a timely manner.

b. *Hazard Tree.* Emergency or hazard tree removal (as defined in Section 20.450.035 VMC) conducted so that critical area impacts are minimized.

c. *Landscape Maintenance.* Landscape maintenance (other than tree removal) consistent with accepted horticultural practices, such as those recommended by the Washington State University Extension Service, within the boundaries of an existing lawn, garden or landscaped area and not associated with development.

d. *Noxious or Invasive Plants.* Clearing of noxious or invasive plants using handheld equipment such as a weed-whacker, provided (i) fueling and maintenance take place outside the critical area and buffer; (ii) all cleared vegetation is taken away and disposed of properly; and (iii) denuded soils are stabilized with native vegetation. The city of Vancouver's noxious or invasive plants list and native plant species list are available from the Planning Official.

e. *Pesticides, Herbicides, Fungicides, or Fertilizers.* Application of pesticides, herbicides, fungicides, or fertilizers, when done as directed in the package instructions as required by state and federal laws.

f. *State or Federally Approved Conservation or Preservation.* State or federally approved conservation or preservation of soil, water, vegetation, fish, shellfish, and other wildlife that does not entail changing the structure or functions of the existing critical area or buffer.

g. *Harvesting Wild Crops.* The harvesting of wild crops in a manner that is not injurious to natural reproduction of such crops or other native vegetation and provided the harvesting does not require tilling of soil, planting of crops, chemical applications, or alteration of the critical area or buffer by changing existing topography, water conditions or water sources.

h. *Passive Activities.* Passive outdoor recreation, education, and scientific research activities such as fishing, hiking, and bird watching that do not degrade the critical area or buffer.

i. *Land surveys, soil sampling, percolation tests, and other related activities.* In every case, impacts to the critical area or buffer shall be minimized and disturbed areas shall be stabilized and replanted immediately.

j. *Navigational Aids and Boundary Markers.* Construction or modification of navigational aids and boundary markers. Impacts to the critical area or buffer shall be minimized and disturbed areas shall be restored within 72 hours.

k. *Agricultural Activities.* Existing and ongoing agricultural activities protected under the federal Food Security Act occurring in wetland areas.

   Existing and ongoing agriculture within fish and wildlife habitat conservation areas so long as livestock and application of pesticides, herbicides, fungicides, and fertilizers is done in accordance with package instructions.

l. *State or Federally Approved Restoration or Enhancement Project.* Implementation of a state or federally approved restoration or enhancement project not related to any development project.

m. *Operation, Repair and Maintenance.* Operation, repair and maintenance of existing structures, infrastructure, roads, sidewalks, railroads, trails, dikes, or levees or water, sewer, stormwater, power, gas, telephone, cable, or fiber optic facilities if the activity does not further increase the impact to, or encroach farther within, the critical area or buffer and there is no increased risk to life or property as a result of the proposed operation, repair, or maintenance.

n. *Public Improvement Projects.* Public improvement projects located within existing impervious surface areas.

o. *City, State or Federally Approved Stand-alone "Critical Area" Creation Project.* Implementation of a city, state or federally approved stand-alone "critical area" creation project that is not mitigation. Also see the definition of "wetlands" in Chapter 20.150 VMC.

p. *Clearing in Frequently Flooded Areas and Seismic Hazard Areas Only.* Clearing vegetation within the floodplain and within a seismic hazard area, but outside other types of critical areas.

q. *Vegetation Clearing.* Clearing vegetation in critical areas that are only seismic hazard areas.

r. *Fence Repair.* Maintenance, repair, and in-kind replacement of existing fences.

s. *Liquefaction Hazard Areas and Ground Shaking Amplification Hazard Areas Only.* Sites identified as located within only a liquefaction and ground shaking amplification hazard area (VMC 20.720.130, Geologic Hazard Areas) shall be exempt from needing to obtain a critical areas permit. All projects within the liquefaction and ground shaking amplification hazard area must comply with the building code at time of building permit review, including providing a geotechnical report.

20.720.040 Approval process.

A. Critical Areas Permit Process.

1. *Pre-application Conference Required.* A pre-application meeting or waiver per Chapter 20.210 VMC is required prior to submitting a critical areas permit. Pre-application conferences shall not be required for the following:

   a. Activities and developments listed as exempted from critical areas standards and permits.

   b. Proposals involving only an addition to an existing six or less dwelling units, including accessory structures, such as accessory dwelling units, attached and detached garages, and/or carports, shops, and sheds.

   c. Other minor improvements determined by the Planning Official to not warrant a pre-application meeting or waiver.

2. *Critical Areas Permit.* If a proposed development activity is determined not to be exempt per the listed critical areas exemptions, the applicant and/or owner shall obtain a critical areas permit prior to commencing the development activity. Critical areas permits shall be processed as a Type I permit when no other permits are filed concurrently or reviewed according to the procedures of the underlying land use application pursuant to Chapter 20.210 VMC.

3. *Review Procedure.* The Planning Official shall make a determination as to whether the proposed activity and mitigation, if any, are consistent with the critical areas approval criteria of this chapter and in compliance with the performance standards for the type(s) of critical area(s) involved. The city may consult with state agencies for preliminary review of mitigation.

4. *Expiration of Permit.* The critical areas permit shall be valid for as long as the underlying land use permit is in effect or as otherwise specified by the Planning Official.

B. Notice on Title – Covenant and Tracts.

1. *Covenants.* This section applies to all nonexempt projects that involve critical areas and buffers, with the exception of frequently flooded areas.

   a. The owner of any property containing a critical area or buffer on which a development proposal is approved shall file a covenant with the county records and elections division according to the direction of the city. The covenant shall state the presence of the critical area and/or buffer on the property, the application of this chapter to the property, and the fact that limitations on actions in or affecting the critical area or buffer may exist, including that the area(s) within the conservation covenant be maintained in a natural state without disturbance to vegetation or other features unless otherwise approved by the city. The covenant shall run with the land in perpetuity. The covenant shall include a map and legal description of the critical area, with wording in the notice substantially similar to the following:

Prior to and during the course of any grading, building construction or other development activity on this property containing or abutting a critical area, the area of development activity must be fenced or otherwise marked to the satisfaction of the City. The critical area shall be maintained in its natural state without disturbance to vegetation or other features, except as provided for by Chapter 20.740 VMC, Critical Areas Protection. Yard waste, debris, fill, equipment, vehicles, and materials shall not be placed in the critical area.

b. The applicant shall submit proof that the covenant has been filed for public record before the city approves any site development or construction for the property or, in the case of subdivisions, short subdivisions, planned unit developments, binding site plans, and other developments that involve platting, at or before recording of the plat.

c. Any modifications to an established and recorded conservation covenant shall be consistent with the standards of this chapter and the originally issued critical areas permit that established the subject conservation covenant. The modification shall be processed as under a Type I review process. Any modification of the covenant that is inconsistent with the originally issued critical areas permit or with the standards of this chapter shall be subject to a review and receive a critical areas permit consistent with the standards of this chapter.

2. *Tracts.* This section applies, in addition to subsection (B)(1) of this section, to projects that involve platting on properties containing fish and wildlife habitat conservation areas, wetlands, geologic hazard areas, and their buffers.

a. The property owner shall place the subject critical areas and buffers in one or more nondevelopable tracts except when the responsible official determines that a tract cannot be provided given the constraints of the site, such as size of the property in question, while meeting all other standards of this title.

b. When the exception in subsection (B)(2)(a) of this section applies, residential lots may extend into the critical area(s) or buffer(s) provided:

i Temporary and permanent markers and signs are installed in compliance with the requirements of VMC 20.720.020, General provisions.

ii The applicant records a conservation covenant protecting the critical area in perpetuity in conformance with subsection (B)(1) of this section.

C. *Financial Assurances*.

1. When mitigation required pursuant to a development proposal is not completed prior to the city's final permit approval, such as final plat approval or final building inspection, the city shall require the applicant to provide security in a form deemed acceptable by the city, including to ensure that mitigation is fully functional, taking into account remaining construction, maintenance, and monitoring.
2. The security shall be in the amount of 125 percent of the estimated cost of restoring the functions of the critical area that are at risk.
3. The security shall remain in effect until the city determines, in writing, that the applicable standards have been met. The security shall be held by the city for a minimum of five years to ensure fully functional mitigation.
4. Depletion, failure, or collection of bond funds shall not discharge the obligation of an applicant or violator to complete required mitigation, maintenance, monitoring, or restoration.
5. Public development proposals shall be relieved from having to comply with the bonding requirements of this section if public funds have previously been committed for mitigation, maintenance, monitoring, or restoration.
6. Failure to satisfy any critical area requirements established by law or condition including, but not limited to, the failure to provide a monitoring report within 30 days after it is due or comply with other provisions of an approved mitigation plan shall constitute a default, and the city may demand payment of any financial guarantees or require other action authorized by the city code or any other law.
7. Any funds recovered pursuant to this section shall be used to complete the required mitigation. Excess funds shall be returned to the applicant.

D. *Critical Area Inspections.* Reasonable access to the site shall be provided to the city, state, and federal agency review staff for the purpose of inspections during any proposal review, delineation, restoration, emergency action, or monitoring period.

E. *Burden of Proof.* The burden of proof shall be on the applicant to bring forth evidence in support of the application and to provide sufficient information on which any decision has to be made on the exemption, critical areas permit, minor exception, reasonable use exception, or any other approval requested under this chapter.

F. *Appeals.* Any decision to approve, condition, or deny a development proposal or other activity based on the requirements of this chapter may be appealed according to VMC 20.210.130.

G. *Programmatic Permits.* The purpose of a programmatic permit is to provide for ongoing, routine maintenance, operation, or repair activities on sites containing critical areas or buffers (1) so as not to impair an agency's or business's ability to operate effectively and efficiently by requiring separate critical areas permits for each activity; and (2) at the same time protect critical areas and buffers in accordance with this chapter.

1. In addition to the submittal requirements in VMC 20.720.050, and any additional critical areas report requirements under VMC 20.720.110 through 20.720.140, applicants for a programmatic permit shall submit a proposed management plan. The management plan shall contain:
   a. A narrative explaining the need for the programmatic permit;
   b. A list of the ongoing, routine, maintenance, operation, or repair activities that impact or potentially impact critical areas and buffers;
   c. A description of the potentially impacted critical area and buffer functions;
   d. Proposed measures and standards for avoiding impacts to critical area and buffer functions and, where unavoidable, mitigating those impacts to achieve no net loss of functions; and
   e. A training program ensuring that all employees, contractors, and individuals under the supervision of the applicant who are involved in permitted activities understand and perform them in accordance with the terms of the permit.
2. A programmatic permit may be approved for up to seven years. The permit duration may be tied to other permits or processes.
3. Every two years for the duration of the programmatic permit 30 days prior to the original date of permit issuance, the applicant shall submit a report to the Planning Official summarizing activities undertaken. The report shall also document the training provided in accordance with subsection (G)(1)(e) of this section.
4. The applicant or the city may initiate an amendment to the programmatic permit if anticipated activities, terms, or conditions of the programmatic permit will change. An amendment shall be considered through a Type 1 process following a pre-application conference.
5. An application for reauthorization of a programmatic permit shall be submitted at least 90 days prior to the date the current permit expires. Programmatic permits may be reauthorized through a Type 1 process following a required pre-application conference. Permit standards and conditions may be modified to conform to the current codes, policies, and standards or based on past performance. Where the review of the reauthorization application will extend beyond the expiration date of the current programmatic permit, the Planning Official may extend the duration of the current permit for up to 60 days at a time, not to exceed 180 days.

20.720.050 Submittal requirements.

A. *Preparation by Qualified Professional.* Any required critical areas report shall be prepared by a qualified professional as defined in Chapter 20.150 VMC.

B. *General Critical Areas Report Contents.* At a minimum, the critical areas report shall contain the following:

1. The name and contact information of the applicant, a description of the proposal, and identification of the permit requested;

2. A copy of the site plan for the development proposal, including:

   a. A map to scale depicting critical areas, buffers, the development proposal, and any areas to be altered or developed; and

   b. A proposed stormwater management and sediment control plan for the development, including a description of any impacts to drainage alterations;

3. The dates, names, and qualifications of the persons preparing the report and documentation of any fieldwork performed on the site. Critical areas reports shall be prepared by a qualified professional for the type of critical area involved;

4. Identification and scientific characterization of all critical areas and buffers. The scientific characterization shall include a detailed assessment of the functional characteristics of the critical areas;

5. An assessment of the probable impacts to critical areas and buffers and risk of injury or property damage including permanent, temporary, and indirect impacts resulting from development of the site and the operations of the proposed development;

6. A written response to each of the approval criteria in VMC 20.720.060;

7. Plans for adequate mitigation, as needed, to offset any impacts, in accordance with subsection E of this section, Mitigation Plan Requirements; and

8. *Additional Information.* Any additional information required for the specific critical areas and buffers as specified in VMC 20.720.110, Fish and wildlife habitat conservation area, VMC 20.720.120, Frequently flooded areas, VMC 20.720.130, Geologic hazard areas, and VMC 20.720.140, Wetlands.

C. *Other Reports or Studies.* Unless otherwise provided, a critical areas report may be supplemented by or composed, in whole or in part, of any reports or studies required by other laws and regulations or previously prepared for and applicable to the development proposal site, as approved by the Planning Official; provided, the site conditions shall not have changed since the earlier report or study was completed.

D. *Critical Areas Report – Modifications to Requirements.* The applicant may consult with the Planning Official prior to or during preparation of the critical areas report when the Planning Official determines and a qualified professional recommends that less information is necessary to adequately address the potential impacts to any critical areas or buffers and the required mitigation. In such case the Planning Official may allow a reduced scope critical areas report.

E. *Mitigation Plan Requirements.* When mitigation is required, the applicant shall submit a mitigation plan as part of the critical areas report. The mitigation plan shall include:

1. *Mitigation rationale.* A discussion of the rationale for the proposed mitigation that includes other mitigation options and why the proposed method best achieves the approval criteria in VMC 20.720.060 as compared with other forms and locations for mitigation.

2. *Detailed Construction Plans.* The mitigation plan shall include descriptions and plans of the mitigation proposed, such as:

   a. The proposed construction sequence, timing, and duration;

   b. Grading and excavation details;

   c. Erosion and sediment control features;

   d. A planting plan specifying plant species, quantities, locations, size, spacing, and density;

   e. Measures to protect and maintain plants until established; and

   f. Detailed site diagrams, scaled cross sectional drawings, topographic maps showing slope percentage and final grade elevations, and any other drawings appropriate to show construction techniques or anticipated final outcome.

3. *Adaptive Management.* The mitigation plan shall include identification of potential courses of action and any corrective measures to be taken if monitoring or evaluation indicates project performance standards are not being met.

4. *Monitoring Program.* The mitigation plan shall include a program for monitoring construction of the mitigation project and for assessing a completed project.

   a. A protocol shall be included outlining the schedule for site monitoring, and how the monitoring data will be evaluated to determine if the performance standards are being met.

   b. A monitoring report shall be submitted as needed to document milestones, successes, problems, and contingency actions of the mitigation project. The mitigation project shall be monitored for a period necessary to establish that performance standards have been met, but not for a period less than five years or more than 10 years, unless otherwise specified in this code.

c. When the applicant believes that the conditions of the monitoring plan are met, the applicant shall contact the city and request that the city certify so in writing. The city shall conduct an on-site assessment as part of the verification process.

d. When the city has verified and certified that the conditions of the monitoring plan have been met, the critical area shall no longer be considered as mitigation, but as a critical area when processing a future development permit application(s).

F. Development may be permitted on a site containing a critical area(s) or buffer(s) which may also be subject to state or federal permits prior to all necessary state or federal permits being obtained when all of the following criteria are met:

1. A phased master plan is submitted under Chapter 20.260 or 20.268 VMC, as appropriate, demonstrating:

a. How the maximum critical area(s) and maximum buffer(s) will be clearly avoided until all local, state, or federal permits are obtained;

b. How each phase could be permitted as an individual project not relying on development of any other phases in any way;

c. How each phase could be developed regardless of whether any or all of the pending state or federal permits are ever obtained; and

d. The applicant demonstrates that there will be no net loss of critical area functions for each phase or for the project as a whole even if state and/or federal permits are not obtained.

2. Development is permitted only in the area that clearly avoids the maximum critical area(s) and buffer(s).

20.720.060 Approval criteria.

Any activity or development subject to this chapter shall be reviewed and approved, approved with conditions, or denied based on the proposal's ability to comply with all of the following criteria. The city may condition the proposed activity as necessary to mitigate impacts to critical areas and their buffers and to conform to the standards required by this chapter.

A. *Mitigation Sequence.* Applications for a critical area permit shall demonstrate avoidance of impacts to the greatest extent practicable. The measures below are listed in order of preference:

1. *Avoid Impacts.* The applicant shall first seek to avoid impacts altogether that degrade the functions and values of a critical area(s). This may include not taking a certain action or parts of an action, or necessitate a redesign of the proposal. The applicant shall provide sufficient evidence to demonstrate no practicable alternative exists that results in less impacts before proceeding through the rest of the mitigation sequence.

2. *Minimize Impacts.* Where avoidance is not feasible, the applicant shall adequately demonstrate why impacts could not be avoided, then minimize the impact of the activity by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts. The applicant shall seek to minimize the fragmentation of the resource to the greatest extent possible.
3. *Rectifying.* Rectify the impact by repairing, rehabilitating, or restoring the affected environment.
4. *Reducing.* Reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action.
5. *Compensatory Mitigation.* After the applicant has demonstrated why impacts could not be minimized, the applicant shall compensate for the unavoidable impacts by replacing each of the affected functions. The compensatory mitigation shall be designed to achieve the functions as soon as practicable. Compensatory mitigation shall be in-kind and on site, when feasible, and sufficient to maintain the functions of the critical area, and to prevent risk from a hazard posed by a critical area to a development or by a development to a critical area.

Compensatory mitigation priority for wetlands is specified in VMC 20.720.140(C)(2)(c). Compensatory mitigation shall offset both permanent and temporal impacts. Fish and wildlife habitat conservation areas are subject to additional compensatory mitigation requirements under VMC 20.720.110(C)(1)(b).

B. *No Net Loss.* The proposal protects the critical area functions and values and results in no net loss of critical area functions and values. If loss of critical area functions are expected, adequate mitigation is provided to offset impacts of anticipated loss.

C. *Incorporate Best Available Science.* The proposal shall demonstrate measures to protect, avoid, and mitigate impacts to the critical area functions and values consistent with best available science known at the time of permit submittal.

D. *Monitoring.* The proposal demonstrates adequate measures to monitor the impacts, and measure the effectiveness of proposed mitigation measures. When corrective action is required to ensure no net loss of functions, the proposal outlines the methods by which such correction shall occur.

E. *Consistency with General Purposes.* The proposal is consistent with the general purposes of this chapter and does not pose a significant threat to the public health, safety, or welfare on or off the development proposal site.

F. *Performance Standards.* The proposal meets the specific performance standards of VMC 20.720.110, Fish and wildlife habitat conservation areas, VMC 20.720.120, Frequently flooded areas, VMC 20.720.130, Geologic hazard areas, and VMC 20.720.140, Wetlands, as applicable.

20.720.070 Minor exceptions.

A. *Minor Exceptions Authorized.* Minor exceptions of no greater than 10 percent from the numeric standards of this chapter may be authorized by the city in accordance with the Type II procedures set forth in Chapter 20.210 VMC. Minor exceptions shall not be combined with buffer averaging or buffer reduction for fish and wildlife habitat conservation areas or wetlands. Minor exceptions from the National Flood Insurance Program development standards of VMC 20.720.120, Frequently flooded areas, are prohibited.

B. *Minor Exception Criteria.* A minor exception from the standards of this chapter may be granted only if the applicant demonstrates that the requested action conforms to all of the following criteria:

1. Unusual conditions or circumstances exist that are specific to the intended use, the land, the lot, or something inherent in the land, and that are not applicable to all other lands in the same vicinity or zoning district;
2. The unusual conditions or circumstances do not result from the actions of the applicant;
3. Granting the minor exception requested will not confer on the applicant any special privilege that is denied by this chapter to other lands, structures, or buildings under similar circumstances;
4. The minor exception is necessary for the preservation and enjoyment of a substantial property right of the applicant such as is possessed by the owners of other properties in the same vicinity or district;
5. The minor exception requested is the least necessary and no greater than 10 percent of the subject standard to relieve the unusual circumstances or conditions identified in subsection (B)(1) of this section;
6. The granting of the minor exception or the cumulative effect of granting more than one minor exception is consistent with the general purpose and intent of the city of Vancouver comprehensive plan, this title, this chapter, and the underlying zoning district;
7. Degradation of the functions (including public health and safety) of the subject critical areas and any other adverse impacts resulting from granting the minor exception will be avoided, minimized and mitigated to the extent feasible in accordance with the provisions of this chapter;
8. Granting the minor exception will not otherwise be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity of the subject property; and
9. The proposed development complies with all other applicable standards.

C. *Conditions May Be Required.* In granting any minor exception, the city may attach such conditions and safeguards as are necessary to secure adequate protection of critical areas and developments from adverse impacts, and to ensure conformity with this chapter.

20.720.080 Reasonable economic use exceptions.

A. *Exception Request and Review Process.* If the application of this chapter would deny all reasonable economic use of the subject property, the city shall determine if compensation is an appropriate action, or the property owner may apply for an exception pursuant to this section. Exceptions from the standards of this chapter may be authorized by the city in accordance with the Type III procedures set forth in Chapter 20.210 VMC .

An application for a reasonable economic use exception shall be made to the city and shall include a critical areas report with a mitigation plan and any other related project documents, such as permit applications to other agencies, special studies, and environmental documents prepared pursuant to the State Environmental Policy Act (Chapter 43.21C RCW). The Planning Official shall prepare a recommendation to the Hearing examiner based on review of the submitted information, a site inspection, and the proposal's ability to comply with the critical areas reasonable use exception criteria.

B. *Reasonable Use Review Criteria.* The city shall approve applications for reasonable use exceptions when all of the following criteria are met:

1. The application of this chapter would deny all reasonable economic use of the property;
2. No other reasonable economic use of the property has less impact on the critical area;
3. The proposed impact to the critical area is the minimum necessary to allow for reasonable economic use of the property;
4. The inability of the applicant to derive reasonable economic use of the property is not the result of actions by the applicant after the effective date of this chapter, or its predecessor;
5. The proposal does not pose a significant threat to the public health, safety, or welfare on or off the development proposal site;
6. The proposal mitigates for the loss of critical area functions to the greatest extent feasible; and
7. The proposal is consistent with other applicable regulations and standards.

20.720.090 Unauthorized critical areas alterations and enforcement.

A. *Enforcement*.

1. It shall be unlawful to violate the provisions of this chapter. Any violation of this chapter shall constitute a public nuisance.

2. VMC Title 22 shall provide the enforcement provisions for this chapter. VMC Title 22 may impose any of the remedies, requirements or corrective actions contained in this chapter. In lieu of or in addition to the enforcement provisions contained in VMC Title 22, the city may also seek injunctive or other relief from any court of competent jurisdiction.

B. *Requirement for Restoration Plan.* In the event the city initiates enforcement action under VMC Title 22 or files a complaint in court, the city may require a restoration plan consistent with the requirements of this chapter. Such a plan shall be prepared by a qualified professional using the best available science and shall describe how the actions proposed meet the minimum performance standards for restoration requirements. The Planning Official shall, at the violator's expense, seek expert advice in determining whether the plan restores the affected area to its preexisting condition or, where that is not possible, restores the functions of the affected area. Inadequate plans shall be returned to the applicant or violator for revision and resubmittal.

C. *Minimum Performance Standards for Restoration*.

1. For alterations to frequently flooded areas, wetlands, and fish and wildlife habitat conservation areas, the following minimum performance standards shall be met for the restoration of a critical area; provided, that if the violator can demonstrate that greater functional and habitat values can be obtained, these standards may be modified:

   a. The structure and functions of the critical area or buffer prior to violation shall be restored, including water quality and habitat functions;

   b. The soil types and configuration prior to violation shall be replicated;

   c. The critical area and buffers shall be replanted with native vegetation (a list of native species is available from the Planning Official). If the critical area or buffer is on a site that meets the criteria of VMC 20.720.030(C)(1)(f)(i), the vegetation for replanting must be not only native but also fire-resistant. A list of native, fire-resistant species is available from the Planning Official; and

   d. Information demonstrating compliance with this chapter's mitigation plan requirements shall be submitted to the Planning Official.

2. For alterations to frequently flooded and geologic hazard areas, the following minimum performance standards shall be met for the restoration of a critical area or buffer; provided, that if the violator can demonstrate that greater safety can be obtained, these standards may be modified:

   a. The hazard shall be reduced to a level equal to, or less than, the pre-violation hazard;

   b. The risk of personal injury resulting from the alteration shall be eliminated or minimized;

   c. Drainage patterns shall be restored to those existing before the alteration; and

d. The hazard area and buffers shall be replanted consistent with pre-violation conditions with native vegetation sufficient to minimize the hazard. If the critical area or buffer is on a site that meets the criteria of VMC 20.720.030(C)(1)(f)(i), the vegetation for replanting must be not only native but also fire-resistant. A list of native, fire-resistant species is available from the Planning Official.

D. *Site Investigations.* The Planning Official is authorized to make site inspections and take such actions as are necessary to enforce this chapter.

E. *Noncompliance in Frequently Flooded Areas.* No structure or land shall hereafter be constructed, located, extended, converted, or altered without full compliance with the terms of this chapter and other applicable regulations. Violations of the provisions of this chapter by failure to comply with any of its requirements (including violations of conditions and safeguards established in connection with conditions) shall constitute a misdemeanor. Any person who violates this chapter or fails to comply with any of its requirements shall upon conviction be subject to enforcement under subsection A of this section. Nothing herein contained shall prevent the city from taking such other lawful action as is necessary to prevent or remedy any violation.

20.720.100 Designation process for habitats of local importance.

A. *Eligibility and Approval Criteria.* Habitats of local importance are fish and wildlife habitat conservation areas that are not designated under VMC 20.720.110, but are designated as locally significant by the city. Criteria for designation include all of the following:

1. A need for protection exists due to a high diversity of fish or wildlife species, declining populations, scarcity of the habitat type, sensitivity to disturbance from human activity or development, or other unique local habitat functions.
2. The area is sufficient in size to support the species or habitat functions for which it is designated.
3. The designation will not compromise the ability of the city to achieve the goals of the comprehensive plan.
4. There is a proposed management strategy describing how the functions of the habitat will be protected after designation.
5. The area and habitat are not otherwise protected under other critical areas regulations.

B. *Designation Process.* Habitats of local importance may be proposed by the property owner or the city and shall be designated according to a Type IV legislative procedure (Chapter 20.210 VMC).

20.720.110 Fish and wildlife habitat conservation areas.

A. *Designation and Location*.

1. The city designates the following identified areas as fish and wildlife habitat conservation areas. Final designations shall be based on site conditions and other available data or information (see VMC 20.720.020(C)(1)).

a. Areas where endangered, threatened, and sensitive species have a primary association, including priority habitats and areas associated with priority species as defined by the Washington Department of Fish and Wildlife (WDFW) PHS List. Within the city, these areas and species primarily include, but may not be limited to, the following:

i Riparian areas composed of riparian management areas (RMAs) and riparian buffers (RBs);

ii Priority Oregon white oak habitat;

iii Biodiversity areas;

iv Waterfowl concentrations; and

v Aquatic habitat;

b. Forage fish spawning areas;

c. Naturally occurring ponds under 20 acres and their submerged aquatic beds that provide fish and wildlife habitat;

d. Waters of the state;

e. Lakes, ponds, streams, and rivers planted with game fish by a governmental or tribal entity;

f. State natural area preserves, natural resource conservation areas, and state wildlife areas; and

g. *Habitats and Species of Local Importance.* Fish and wildlife habitat conservation areas or individual species that are designated as locally significant by the city in accordance with VMC 20.720.100.

h. *Fish and Wildlife Habitat Conservation Area Locations.* Information on the approximate location and extent of fish and wildlife habitat conservation areas is available from the following sources:

i U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries species list;

ii WDFW priority habitat and species maps;

iii WDFW anadromous and resident salmonid distribution maps in the Salmon and Steelhead Habitat Inventory Assessment Program (SSHIAP);

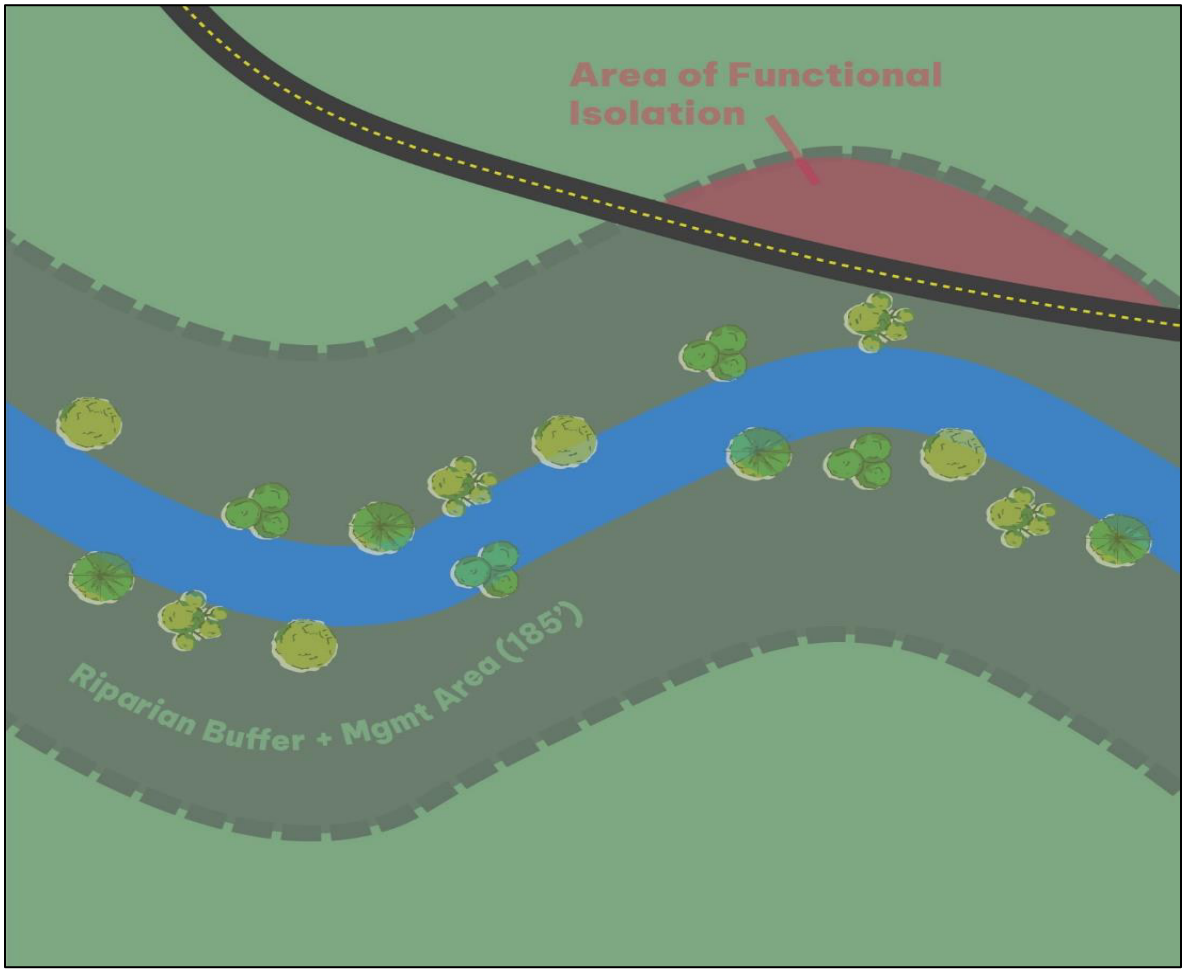
iv StreamNet.org maps from the Pacific States Marine Fisheries Commission;

v Washington State Department of Natural Resources (DNR) official water type reference maps; and

vi Other information acquired by the city such as site-specific or area-specific delineations or studies.

B. *Development activities that functionally or physically isolate the RMA or RMB buffer.* When existing impervious surfaces or other built structures functionally or physically isolate the RMA or RB buffer from the water body, the regulated RMA or RB wetland buffer shall extend landward from the ordinary high water mark (OHWM) or channel migration zone (CMZ), whichever is greater, and terminate at the waterward edge of the impervious surface or manmade structure. Development activities that occur within the area of functional isolation, or further landward, are exempt from the requirement to obtain a critical areas permit.

FIGURE 20.720.110-1. FUNCTIONAL ISOLATION



The obstruction causing the physical isolation shall be significant enough in size and stature that protective buffers or other mitigation measures cannot reasonably restore ecological functions or benefits. The Planning Official may rely on a site visit, aerial photographs, other evidence provided by the applicant or the applicant's qualified professional, and consultation with the Washington Department of Fish and Wildlife (WDFW) in making a determination to reduce the width of the RMA, RB, or wetland buffer based on functional and/or physical isolation. The following obstructions shall not constitute functional isolation:

1. Trails, paths, or sidewalks;
2. Minor accessory structures;
3. Driveways or drive aisles;
4. Subsurface utilities.

Note: RMAs and RBs are measured from the OHWM or the edge of a channel migration zone (CMZ), whichever is further landward. However, no CMZs have been identified within the city limits as of the date this chapter was adopted.

C. Performance Standards.

1. Development Standards.

a. Development and Clearing Activities.

i Development or clearing activities shall protect the functions of the fish and wildlife habitat conservation areas on the site and shall result in no net loss of functions, as required by the approval criteria of this chapter.

ii If development or clearing activity is within a priority habitat and species area, the applicant shall follow WDFW management guidelines, management recommendations, or other standards approved by WDFW.

iii Functionally significant habitat, defined as habitat that cannot be replaced or restored within 20 years, shall be preserved unless the activity meets the conditions of subsection (C)(2)(c) of this section. An example of habitat that cannot be replaced within 20 years would be a stand of mature trees or a peat bog.

b. *Mitigation*.

i Mitigation for impacts within fish and wildlife habitat conservation areas shall follow the sequence specified in this chapter's approval criteria. WDFW shall be consulted when a project may potentially impact priority habitats and species (PHS) on or adjacent to the project area.

ii Disrupted functions and values shall be mitigated on site as a first priority, and off site thereafter.

iii An up-to-date science-based guide, such as applicable watershed, fish recovery, sub-basin, or other science-based plans should be used to guide the proposed mitigation. Any science used to guide mitigation actions, whether on site or off site, must meet the criteria and characteristics of best available science listed in WAC 365-195-905 (Criteria for determining which information is the "best available science"), or the state standards in effect at the time of application.

c. *Signs for Fish and Wildlife Conservation Areas*.

i Temporary and permanent markers and signs shall be installed as required by this chapter's general provisions.

2. *Standards for RMAs and RBs*.

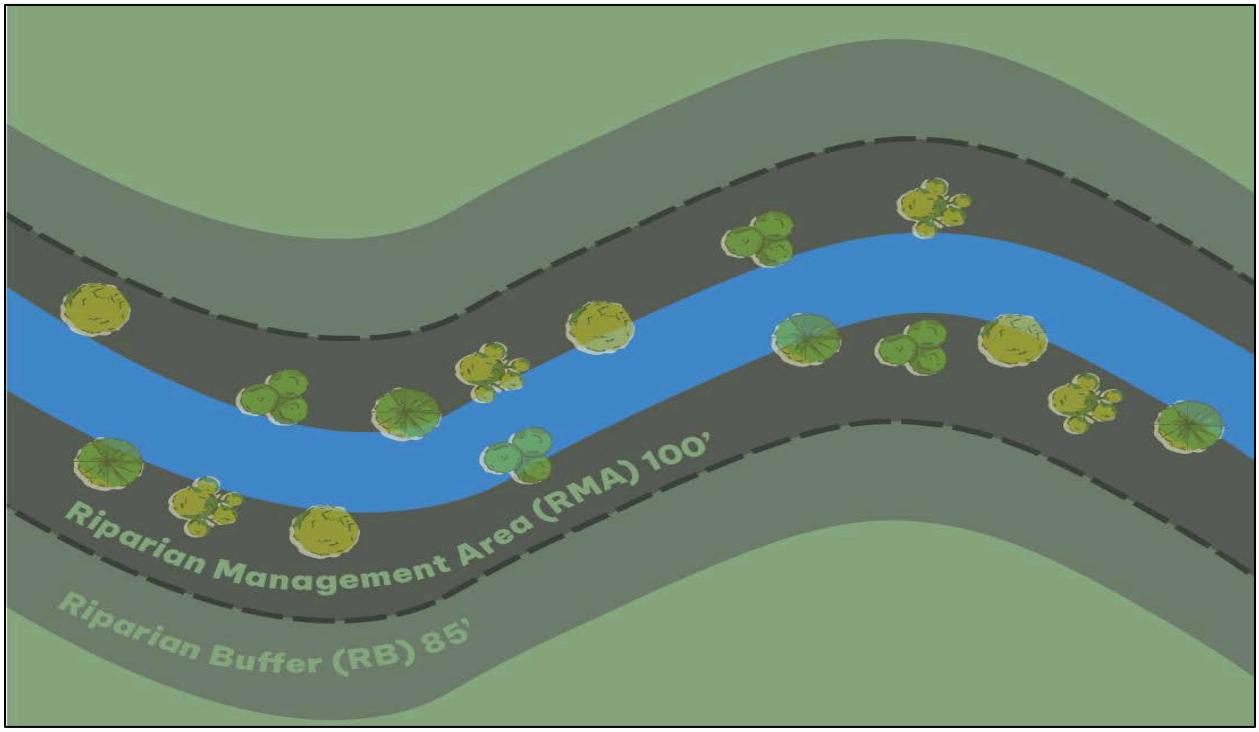
a. *RMA and RB Location and Width*.

i *Standard Width.* Standard RMA widths are 100 feet for shorelines of the state (Type S), for both fish-bearing and non-fish-bearing water bodies and for unclassified streams. The RB is 85 feet for all classified and unclassified water body types. The RMA and RB widths shall be combined for a total regulated riparian area width of 185 feet.

ii *Site Potential Tree Height (SPTH) RMA and RB Width.* If the applicant cannot accommodate the standard-width RMA and RB on the project site for the proposed development, applicants may use the 200-year SPTH mapping tool referenced in WDFW's Riparian Ecosystems, Volume 2: Management Recommendations and justify a lesser-width RMA and/or RB in the project's critical areas report. For project locations with multiple SPTH values, the largest SPTH value shall be used to establish the riparian area width. If the tool does not have data available to establish SPTH, the minimum combined RMA and RB width shall be the standard width as established in subsection (C)(2)(a)(i) of this section.

iii *Measurement.* Whether the standard or SPTH RMA and RB is used, the RMA is measured horizontally from the OHWM of the stream, river, or lake or from the CMZ, where present, to the specified width. The RB is measured horizontally from the landward boundary of the RMA as shown in Figure 20.720.110-2.

FIGURE 20.720.110-2.



b. *Riparian Management Area Width Averaging.* The width of the RMA may be modified if all the following are met:

   i The total square footage of the RMA (subsection (C)(2)(a)(i) of this section) is not reduced;

   ii There is no net loss of functions as a result of the averaging; and

   iii The reduction of the RMA width at any location is no greater than 25 percent of the required standard or SPTH width under subsection (C)(2)(a)(i) or (C)(2)(a)(ii) of this section.

c. *Permitted Development and Uses within RMAs and RBs and Development Standards*.

   i *Development and Uses within the Riparian Buffer.* Development or clearing activity is permitted in the RB that meets the general performance standards in this subsection.

   ii *Development and Uses within the RMA.* No development or clearing activity is allowed within the RMA unless such activity is:

      (A). A water-dependent, water-related or water-enjoyment activity for which there are no feasible alternatives that would have a less adverse impact on the RMA;

      (B). Infrastructure or utilities that cannot feasibly be located outside of the wetland, that minimize the impact, that mitigate for any unavoidable impact to functions, and have received authorization from applicable federal and state regulating agencies;

(C). Mitigation for activities allowed by this chapter, providing the activity results in no net loss of riparian habitat functions on the site; or

(D). Trails and wildlife viewing structures; provided, that the trails and structures minimize the impact and are constructed so that they do not interfere with hydrology of the water body and do not result in increased sediment entering the water body.

iii *Modifications to Existing Development.* When replacing or removing existing development within an RMA or RB, the applicant shall implement the following, where applicable, during site construction:

(A). Evaluate the RMA and RB to pinpoint the best sites to restore and consider connectivity and adjacency to other priority habitats;

(B). Improve aquatic connectivity by replacing culverts and removing barriers to movement;

(C). Revegetate with native plants and consider improvements for wildlife by integrating structures necessary for nesting, breeding, and foraging;

(D). As existing development is remodeled or replaced, incorporate additional setbacks for streams;

(E). Control access to RMAs and RBs during construction to limit soil compaction. Avoid operating equipment near water bodies to reduce sedimentation and soil compaction; and

(F). Avoid using chemicals in the RMA and RB that are not approved by the Washington State Department of Ecology (Ecology).

iv *Mitigation.* When mitigating on-site impacts, the following guidelines, where applicable, shall be implemented when designing mitigation for impacted riparian areas, if a restoration opportunity is available on site and within the RMA or RB:

(A). Protect riparian functions that remain, especially in places that are high functioning and implement actions that enhance degraded functions;

(B). Increase riparian width in areas of high function; and

(C). Prioritize opportunities to maintain and restore in-stream and riparian connectivity.

D. *Additional Critical Areas Report Requirements*.

1. A critical areas report for an RMA or RB shall include:

a. The SPTH riparian area width in the mapping tool referenced in WDFW's Riparian Ecosystems, Volume 2: Management Recommendations document, if the applicant is not proposing to use the standard-width RMA and RB.

b. In addition to the standards of VMC 20.720.050(E), where a mitigation plan is required as part of the critical areas report for a fish and wildlife habitat conservation area that involves a water body, RMA, or RB, the monitoring program protocol shall include, where relevant to the impacted functions:

i Observations and measurements of riparian integrity and quality (buffer width, riparian corridor continuity or fragmentation, species diversity, stand age, plant survival rates);

ii Large woody debris surveys;

iii Streamflow monitoring;

iv Water quality monitoring to detect pollution impacts; and

v Biological monitoring including fish surveys and benthic macroinvertebrate sampling.

2. If the clearing or development activity is in the RMA, the critical areas report shall contain all the following information, if applicable:

a. How the clearing or development activity constitutes a water-dependent, water-related, or water-enjoyment use;

b. How the clearing or development activity cannot feasibly be located on the site outside of the RMA;

c. How the proposal meets the RMA width averaging standard (subsection (C)(2)(b) of this section); and

d. How the proposal will not adversely affect the connectivity of habitat functions.

3. For land use and development-related activities on a site with PHS-designated priority Oregon white oak woodland habitat, the applicant shall be required to demonstrate compliance with WDFW's latest guidance: Best Management Practices for Mitigating Oregon White Oak Priority Habitat (January 2024) and any subsequent revisions. The report shall include mapping and an evaluation of the habitat functions.

a. The critical areas report shall also identify protection and mitigation for the impacted Oregon white oaks on the site. In circumstances where it is demonstrated that preservation or mitigation of impacts on site is not practicable, the applicant shall provide a minimum of two alternative site designs and layouts to demonstrate that impacts cannot be avoided or be reduced to result in less impacts. The planning director may approve reductions to numerical standards including parking and setbacks under the minor exception process in VMC 20.720.070 to avoid or reduce impacts.

b. If compensation is determined to be the only available option for the proposed impact, the report shall include the quantity and method of mitigation to compensate for permanent and temporal impacts in accordance with WDFW's Best Management Practices for Mitigating Impacts to Oregon White Oak Priority Habitat, including the following:

   i Assessment of priority Oregon white oak woodlands and individuals to determine if they meet the designation criteria for priority habitat and species, the size of each woodland or individual, and the level of ecological function provided;

   ii Analysis of the physical and temporal loss of the impacted Oregon white oak woodland habitat;

   iii The corresponding mitigation ratios for both physical and temporal loss of the impacted Oregon white oak habitat and the location of such mitigation; and

   iv Description of monitoring as outlined by WDFW's guidance.

20.720.120 Frequently flooded areas.

This section shall apply to all special flood hazard areas within the boundaries of the city of Vancouver.

A. *Designation.* Frequently flooded areas are the areas of special flood hazards identified by the Federal Insurance Administrator and the Federal Emergency Management Agency (FEMA), respectively, in scientific and engineering reports entitled Flood Insurance Study: Clark County, Washington and Incorporated Areas, Volumes 1 and 2 (Numbers 53011CV001A and 53011CV002A, respectively) effective September 5, 2012, and any revisions thereto, with accompanying Flood Insurance Rate Maps (FIRMs and their digital version, DFIRMs) and any revisions thereto, which are hereby adopted by reference and declared to be part of this chapter. The Flood Insurance Study (FIS), FIRMs and DFIRMs are available from the Planning Official, 415 West 6th Street, Vancouver, WA 98660. (See VMC 20.150.040A and 20.150.040B, Meanings of Specific Words and Terms, for definitions for "areas of special flood hazards," "floodplain," "floodway," and "frequently flooded areas.")

When base flood elevation (BFE) data has not been provided in frequently flooded areas (Zone A), the Planning Official shall obtain, review, and reasonably utilize any base flood elevation and floodway data available from a federal, state or other source in order to administer the provisions of this chapter. This best available information for flood hazard area identification shall be the basis for regulation until a new FIRM/DFIRM is issued.

B. *Compliance.* All development within special flood hazard areas is subject to the terms of this chapter and other applicable regulations.

C. *Penalties for Noncompliance.* See VMC 20.720.090.

D. *Abrogation and Greater Restrictions.* This chapter is not intended to repeal, abrogate, or impair any existing easements, covenants, or deed restrictions. However, where this chapter and another ordinance, easement, covenant, or deed restriction conflict or overlap, whichever imposes the more stringent restrictions shall prevail.

E. *Interpretation (Not Mandatory).* In the interpretation and application of this chapter, all provisions shall be:

   1. Considered as minimum requirements;

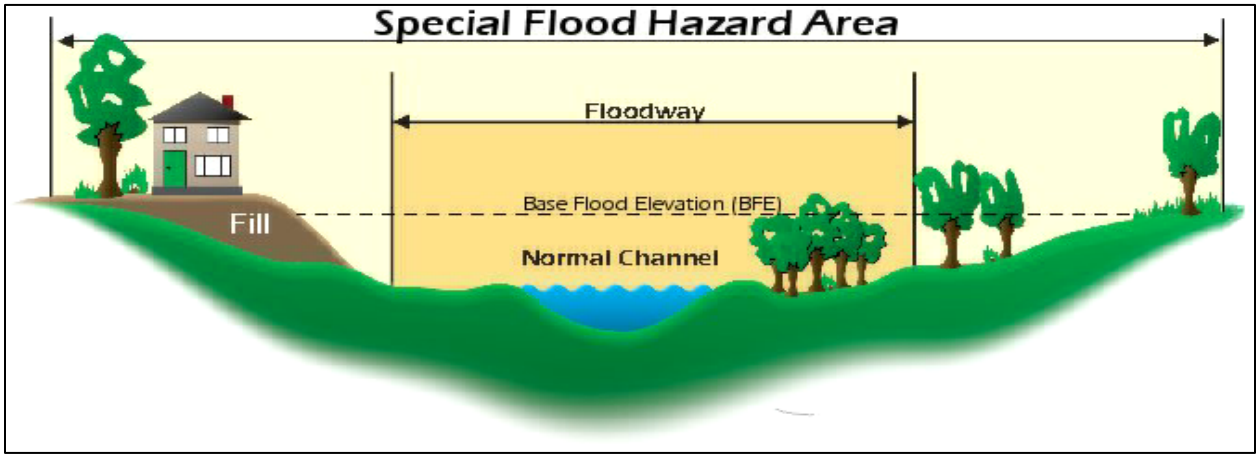
   2. Liberally construed in favor of the governing body; and

   3. Deemed neither to limit nor repeal any other powers granted under state statutes.

F. *Warning and Disclaimer of Liability.* The degree of flood protection required by this chapter is considered reasonable for regulatory purposes and is based on scientific and engineering considerations. Larger floods can and will occur on rare occasions. Flood heights may be increased by manmade or natural causes. This chapter does not imply that land outside the areas of special flood hazards or uses permitted within such areas will be free from flooding or flood damages. This chapter shall not create liability on the part of the city of Vancouver, any officer or employee thereof, or the Federal Insurance Administrator for any flood damages that result from reliance on this chapter or any administrative decision lawfully made hereunder.

G. *Severability.* This chapter and the various parts thereof are hereby declared to be severable. Should any section of this chapter be declared by the courts to be unconstitutional or invalid, such decision shall not affect the validity of the chapter as a whole, or any portion thereof other than the section so declared to be unconstitutional or invalid.

FIGURE 20.720.120-1. FREQUENTLY FLOODED AREAS/AREAS OF SPECIAL FLOOD HAZARDS



Adapted from Floodplain Management: A Local Administrator's Guide to the National Flood Insurance Program, Fifth Edition, FEMA Region 10

H. *Designation of the Floodplain Administrator (44 CFR 59.22(b)(1)).* The land use program manager is hereby appointed to administer, implement, and enforce this chapter by granting or denying development permits in accordance with its provisions. The floodplain administrator may delegate authority to implement these provisions.

1. *Duties and Responsibilities of the Floodplain Administrator.* Duties of the floodplain administrator shall include, but not be limited to:

a. *Development Review.* Review all proposed developments to:

i Determine whether a floodplain permit is required;

ii Make interpretations where needed as to the exact location of special flood hazard area boundaries, with respect to the flood insurance study maps and zoning district boundaries.

b. *Permit Review.* Review all development permits to determine that:

i The permit requirements of this chapter have been satisfied;

ii All other required state and federal permits have been obtained;

iii The site is reasonably safe from flooding;

iv The proposed development is not located in the floodway. If located in the floodway, ensure the encroachment provisions of Section 5.4-1 are met;

v Notify FEMA when annexations occur in the special flood hazard area.

I. *Additional Critical Areas Report Requirements.* In addition to the critical areas report requirements in VMC 20.720.050, the following information shall be submitted. Elevation data shall reference the NAVD 1988 Datum.

1. Base (100-year) flood elevation in relation to mean sea level. When base flood elevation has not been provided or is not available from an authoritative source, it shall be generated by the applicant for developments which contain at least 50 lots or five acres, whichever is less.
2. Elevation in relation to mean sea level of the lowest floor (including basement) of all existing and proposed structures.
3. Elevation in relation to mean sea level to which any structure's lowest floor (including basement) is raised to be at least one foot above the base flood elevation or for nonresidential flood-proofed structures, the elevation in relation to mean sea level to which any structure is flood-proofed.
4. Location of the channel migration zone. See the Clark County Shoreline Inventory and Characterization Report, Volume 1, Lewis and Salmon-Washougal Watersheds and Rural Areas, Map 27, Potential Channel Migration Zone (CMZ) Areas for general locations of channel migration zones. The actual location of the channel migration zone on site must be identified by a qualified professional and mapped in accordance with the submittal requirements of VMC 20.720.050.
5. Description of strategies taken to avoid, minimize, and mitigate unavoidable impacts to public safety. When the base flood elevation has not been provided or is not available from an authorized source (subsection A of this section), the critical areas report shall include a discussion of how and whether the proposed development would be reasonably safe from flooding. Historical data, high water marks, photographs of past flooding and other available information will be used as the basis for this discussion and conclusion.
6. Certification, documentation, and demonstration by a qualified professional of how the applicable standards of subsection J of this section will be met. To support the "no rise" analyses required in subsection (J)(1) of this section, the documentation required in the most recently updated or amended FEMA Region 10 publication, Floodplain Management: A Local Floodplain Administrator's Guide to the National Flood Insurance Program shall be submitted.

J. *Performance Standards.* Except as noted, the following standards apply to all structures and development (including but not limited to the placement of manufactured homes, substantial improvement, roads, railroads, trails, dikes, levees, or water, sewer, stormwater conveyance, gas, power, cable, fiber optic or telephone facilities) in all areas of special flood hazards and channel migration zones (CMZs). Additional restrictions apply in the floodway.

1. *Encroachments*.
   a. *Designated Floodway: Prohibited Encroachments.* The following are prohibited in the floodway:
      i Water wells (subsection (J)(4)(a) of this section).
      ii On-site waste disposal systems (subsection (J)(5)(a) of this section).
      iii Residential structures or other structures for human habitation including but not limited to:

(A). Building envelopes within subdivisions (subsection (J)(9)(a) of this section);

(B). New construction or reconstruction of residential structures (subsection (J)(10)(b)(i) of this section);

(C). Placement or replacement of manufactured homes (all types) (subsection (J)(10)(b)(ii) of this section);

(D). Critical facilities housing vulnerable populations and emergency services (subsection (J)(12)(a) of this section); and

(E). Recreational vehicles (subsection (J)(13)(a) of this section).

b. *Designated Floodway – Allowed Encroachments.* In areas where the base flood elevation has been provided and a regulatory floodway has been designated, other encroachments including but not limited to fill, new construction, replacement structures, substantial improvements and other development shall be prohibited unless:

i Certification by a qualified professional (in this case, a registered professional engineer) is provided, demonstrating through hydrologic and hydraulic analyses performed in accordance with standard engineering practice that the proposed encroachment would not result in a net increase in base flood elevation (less than 0.00 feet, rounded) or flood velocity during the occurrence of the base flood discharge. At a minimum, such "no rise" analyses shall include a step-backwater analysis and a conveyance compensation analysis as required in the most recently updated or amended FEMA Region 10 publication, Floodplain Management: A Local Floodplain Administrator's Guide to the National Flood Insurance Program; and

ii The applicable standards of subsections (J)(2) through (J)(15) of this section are also met.

c. *No Designated Floodway – Allowed Encroachments.* In areas where the base flood elevation has been provided but a regulatory floodway has not been designated, no encroachments including but not limited to new construction, substantial improvement, or other development (including fill) shall be permitted, unless:

i The applicant has demonstrated that the cumulative effect of the proposed development, when combined with all other existing and anticipated development will not increase the water surface elevation of the base flood more than one foot at any point; and

ii The applicable standards of subsections (J)(2) through (J)(15) of this section are also met.

d. *Other Areas of Special Flood Hazards and CMZs.* In areas of special flood hazards except the floodway or where the BFE has not been provided, or in channel migration zones, encroachments, including but not limited to fill, new construction, replacement structures, substantial improvements and other development, shall be prohibited, unless:

i A qualified professional provides certification demonstrating that the proposed project would not result in a net loss of flood storage capacity; and

ii The applicable standards of subsections (J)(2) through (J)(15) of this section are also met.

2. *Property Damage.* Development shall not result in adverse impacts to other properties either upstream or downstream.

3. *Drainage.* Drainage paths around structures and on slopes shall be adequate to guide floodwaters around and away from proposed structures and adjacent properties.

4. *Water.*

   a. Water wells are prohibited in the floodway.

   b. In areas of special flood hazards except the floodway and in CMZs, water wells shall be constructed to withstand a 100-year flood without adversely impacting groundwater quality (WAC 173-160-171).

   c. All new and replacement water supply systems shall be designed to minimize or eliminate infiltration of flood waters into the system.

5. *Waste*.

   a. On-site waste disposal systems are prohibited in the floodway.

   b. In areas of special flood hazards except the floodway and in CMZs, on-site waste disposal systems shall be located to avoid flood damage to them or release of contaminants from them during a base flood event.

   c. New and replacement sanitary sewage systems shall be designed to minimize or eliminate infiltration of floodwaters into the systems and discharge from the systems into floodwaters.

6. *Construction Materials and Methods*.

   a. Construction methods and practices shall minimize flood damage.

   b. Construction materials and utility equipment shall be resistant to flood damage. For guidance on flood-resistant materials see the most current FEMA Technical Bulletin 2, Flood-Resistant Materials Requirements.

   c. Electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities shall be designed and/or otherwise elevated or located so as to prevent water from entering or accumulating within the components during a base flood event. For guidance on the placement of building utility systems, see the most current FEMA Publication No. 348, Protecting Building Utilities from Flood Damage.

7. *Anchoring.* All new construction including substantial improvements and all types of manufactured homes shall:
    a. Be elevated on a permanent foundation and securely anchored to an adequate foundation system to prevent flotation, collapse, or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads including the effects of buoyancy.
    b. Be installed or placed using methods and practices that minimize flood damage. Manufactured home placement shall follow the guidance in the most current FEMA P-85, Protecting Manufactured Homes from Floods and Other Hazards.
8. *Enclosed Areas Below the Base Flood Elevation*.
    a. Enclosed areas below the base flood elevation shall be used only for vehicle parking, building access, or storage.
    b. New or substantially improved enclosed areas below the base flood elevation shall be constructed in accordance with:
        i Subsection (J)(7) of this section, Anchoring;
        ii Subsections (J)(10)(c)(ii) and (J)(10)(d) of this section, Residential Construction;
        iii Subsections (J)(6)(b) and (J)(6)(c) of this section, Construction Materials and Methods.
    c. Enclosed areas below the BFE shall not be considered to be the lowest floor when they are not part of a basement and meet the requirements of subsection (J)(10)(d) of this section.
    d. *Crawlspace Construction.* Crawlspaces are a type of enclosed area below the BFE. Crawlspaces constructed at or above the lowest adjacent exterior grade are preferred. (Note: Insurance premiums for structures with below-grade crawlspaces will be higher than those with the interior elevation at or above the lowest adjacent exterior grade.) Refer to the most current FEMA Technical Bulletin 11, Crawlspace Construction for Buildings Located in Special Flood Hazard Areas (available from the Planning Official) for more information. Crawlspaces:
        i Are prohibited in areas with flood velocities greater than five feet per second unless designed by a qualified professional (in this case an architect or professional engineer).
        ii Shall meet the requirements of subsections (J)(8)(a) through (J)(8)(c) of this section, Enclosed Areas Below the Base Flood Elevation.
        iii Shall not be considered “basements” for the purposes of this section when constructed according to the following standards:
            (A). The interior grade of a crawlspace below the base flood elevation must not be more than two feet below the lowest adjacent exterior grade.

(B). The height of the below-grade crawlspace, measured from the interior grade of the crawlspace to the top of the crawlspace foundation wall, must not exceed four feet at any point.

(C). The crawlspace must be equipped with a drainage system that removes floodwaters from the interior area of the crawlspace in a reasonable period of time after a base flood event.

9. *Subdivisions*.

a. *All subdivisions shall be designed*:

i To ensure that no residential structure or other structures for human habitation are located in the floodway even though lots may extend into the floodway;

ii To avoid placement of any structures in areas of special flood hazards and in CMZs;

iii Where it is not possible to design a subdivision in a manner to avoid placement of any structures in areas of special flood hazards or CMZs, the subdivision shall be designed to minimize or eliminate potential flood damage.

b. All subdivisions shall have facilities such as sewer, gas, power, cable, fiber optic, telephone, stormwater and water systems located and constructed to minimize or eliminate flood damage. (See subsection (J)(2) of this section, Property Damage; subsection (J)(4) of this section, Water; subsection (J)(5) of this section, Waste; subsection (J)(6) of this section, Construction Materials and Methods; and subsection (J)(7) of this section, Anchoring.)

c. All subdivisions shall have adequate drainage provided to reduce exposure to flood damage. (See subsection (J)(3) of this section, Drainage.)

10. *Residential Construction (Including Manufactured Homes)*.

a. *Residential Construction in the Floodway*.

i New construction and reconstruction of residential development including placement and replacement of all types of manufactured homes is prohibited in the floodway, unless sited as a temporary use in accordance with requirements listed in this section.

ii Existing residential structures and manufactured homes in the floodway are nonconforming, but may be repaired or improved, provided:

(A). The repair or improvement does not increase the ground floor area of the structure; and

(B). The repair or improvement does not result in adverse impacts to other properties either upstream or downstream; and

(C). The cost of the repair or improvement does not exceed 50 percent of the market value of the structure either:

(1). Before the start of repair or improvement where there is no damage to the structure; or

(2). Before flood or other damage to the structure occurred.

(D). Any project for improvement of a structure to correct existing violations of local health, sanitary, or safety code specifications which have been identified by the Planning Official and which are the minimum necessary to ensure safe living conditions may be excluded from the 50 percent.

(E). Any project for improvement to a structure identified as a historic place may be excluded from the 50 percent.

b. *Residential Construction in Other Areas of Special Flood Hazards and CMZs.* In areas of special flood hazards except the floodway and in channel migration zones:

i New residential construction and reconstruction, including all types of manufactured homes and other structures for human habitation, shall meet all the provisions of this chapter, including subsections (J)(8) and (J)(10)(c) through (J)(10)(d) of this section.

ii New placement or replacement of all types of manufactured homes shall meet the standards of subsection (J)(7) of this section, Anchoring.

iii *Repair or Substantial Improvement.* All provisions of this chapter (including the elevation standards of subsections (J)(8), (J)(10)(c) and (J)(10)(d) of this section), all state and local health, sanitary, safety codes, and where applicable, historic preservation codes shall be met when the cost of repair or improvement of an existing residential structure exceeds 50 percent of the market value of the structure either:

(A). Before the start of repair or improvement where there is no damage to the structure; or

(B). Before flood or other damage to the structure occurred.

c. *Elevation*.

i *BFE Established.* The lowest floor (including basement) of new residential structures (including but not limited to reconstruction, substantial improvement, the placement or replacement of all types of manufactured homes) shall be elevated at least one foot above base flood elevation. Structures shall be elevated using means other than fill (such as extended foundation or other enclosure walls, piles, or columns) whenever feasible. Mechanical equipment and utilities shall be waterproofed or elevated at least one foot above the BFE.

ii *No BFE.* In areas where the base flood elevation has not been provided or is not available from an authorized source (subsections A and (I)(5) of this section) and the critical areas report demonstrates to the satisfaction of the Planning Official that the proposed development would be reasonably safe from flooding, new residential construction (including but not limited to substantial improvement and the placement of manufactured homes) shall be elevated at least two feet above the highest adjacent grade. (Note: Failure to elevate at least two feet above the highest adjacent grade may result in higher insurance rates.)

d. *Fully Enclosed Areas Below Lowest Floor.* Fully enclosed areas below the lowest floor that are subject to flooding are prohibited unless designed to automatically equalize hydrostatic flood forces on exterior walls by allowing for the entry and exit of floodwaters. Designs for meeting this requirement must be certified by a qualified professional (in this case, a registered professional engineer or architect), or must meet or exceed the following minimum criteria:

i Contain a minimum of two openings having a total net area of not less than one square inch for every one square foot of enclosed area subject to flooding;

ii The bottom of all openings are no higher than one foot above grade; and

iii Openings permit the automatic entry and exit of floodwaters even when equipped with screens, louvers, or other coverings or devices.

iv For guidance on flood openings, see FEMA Technical Bulletin 1-93, Openings in Foundation Walls.

v A garage attached to a residential structure, constructed with the garage floor slab below the BFE, must be designed to allow for automatic entry and exit of floodwaters.

11. *Nonresidential Construction.* New construction and substantial improvement of any nonresidential structure shall either be elevated (subsection (J)(11)(a) or (J)(11)(b) of this section) or flood-proofed (subsection (J)(11)(c) of this section):

a. *Be Elevated – BFE Established*.

i Have the lowest floor, including basement, elevated at least one foot above the base flood elevation or elevated as required by ASCE 24, whichever is greater;

ii Meet the same standards for space below the lowest floor as described in subsections (J)(8)(d) and (J)(10)(d)(i) through (J)(10)(d)(iii) of this section; and

iii Have mechanical equipment and utilities waterproofed or elevated at least one foot above the BFE, or as required by ASCE 24, whichever is greater.

b. *Be Elevated – No BFE*.

i In areas where the base flood elevation has not been provided or is not available from mapped data from federal or state sources and the critical areas report demonstrates to the satisfaction of the Planning Official that the proposed development would be reasonably safe from flooding, new nonresidential construction shall be elevated at least two feet above the highest adjacent grade. Failure to elevate at least two feet above the highest adjacent grade may result in higher insurance rates; and

ii Meet the same standards for space below the lowest floor as described in subsections (J)(8)(d) and (J)(10)(d) of this section; or

c. *Be Flood-Proofed.* Together with attendant utility and sanitary facilities shall:

i Be flood-proofed so that below one foot (or more) above the base flood elevation, the structure is watertight with walls substantially impermeable to the passage of water or dry flood-proofed to the elevation required by ASCE 24, whichever is greater;

ii Have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy;

iii Be certified by a registered professional engineer or architect that the design and methods of construction are in accordance with accepted standards of practice for meeting provisions of this subsection based on their development and/or review of the structural design, specifications and plans. Such certifications shall be provided to the Planning Official as set forth in subsection L of this section.

12. *Critical Facilities*.

a. Critical facilities housing vulnerable populations and emergency services shall be prohibited in the floodway.

b. In areas of special flood hazards except the floodway and in CMZs, construction of new critical facilities shall be prohibited unless the applicant demonstrates that:

i No feasible alternative site is available; and either:

(A). The lowest floor, entrances, egresses, and to the extent feasible access routes are elevated to three feet above the base flood elevation or to the elevation of the 500-year flood, whichever is higher; or

(B). The applicant demonstrates that other measures would ensure that in the event of a flood, the facility would remain safe and fully operational and that potentially harmful materials would not be displaced by or released into floodwaters. Such measures shall be conditions of approval of the critical areas permit.

13. *Recreational Vehicles*.

a. Recreational vehicles shall be located outside the floodway.

b. Recreational vehicles in areas of special flood hazard except the floodway and in CMZs shall either:

i Be on the site for fewer than 180 consecutive days;

ii Be fully licensed and ready for highway use, on its wheels or jacking system, attached to the site only by quick disconnect type water, sewer, stormwater, gas, power, cable, fiber optic, telephone, and security devices, and have no permanently attached additions; or

iii Meet the requirements of subsection (J)(7) of this section, Anchoring; subsection (J)(8) of this section, Enclosed Areas below the Base Flood Elevation; and subsection (J)(10)(c) of this section, Elevation.

14. *Appurtenant Structures (Detached Garages and Small Storage Structures)*. For A zones:

a. Appurtenant structures used solely for parking of vehicles or limited storage may be constructed such that the floor is below the BFE, provided the structure is designed and constructed in accordance with the following requirements:

i Use of the appurtenant structure must be limited to parking of vehicles or limited storage;

ii The portions of the appurtenant structure located below the BFE must be built using flood-resistant materials;

iii The appurtenant structure must be adequately anchored to prevent flotation, collapse, and lateral movement;

iv Any machinery or equipment servicing the appurtenant structure must be elevated or flood-proofed to or above the BFE;

v The appurtenant structure must comply with floodway encroachment provisions in Section 5.4-1;

vi The appurtenant structure must be designed to allow for the automatic entry and exit of floodwaters in accordance with Section 5.2-1(5);

vii The structure shall have low damage potential;

viii If the structure is converted to another use, it must be brought into full compliance with the standards governing such use; and

ix The structure shall not be used for human habitation.

b. Detached garages, storage structures, and other appurtenant structures not meeting the above standards must be constructed in accordance with all applicable standards in Section 5.2-1.

c. Upon completion of the structure, certification that the requirements of this section have been satisfied shall be provided to the floodplain administrator for verification.

15. *Alteration of Watercourse*.

a. The Planning Official shall notify adjacent communities and the state coordinating agency, Washington State Department of Ecology, prior to any alteration or relocation of a watercourse, and submit evidence of such notification to the Federal Insurance Administrator.

b. Alteration or relocation of a watercourse shall be allowed only after:

i Certification by a qualified professional that the alteration or relocation:

(A). Is the only feasible alternative or is part of a restoration project approved by the appropriate state or federal agencies;

(B). Will not diminish the flood-carrying capacity of the watercourse;

(C). Will not block side channels;

(D). Will be accomplished using soft armoring techniques wherever possible;

(E). Will avoid to the extent possible and then minimize and mitigate removal of vegetation including downed woody vegetation; and

(F). Will not endanger development in the channel migration zone.

ii The applicant provides assurance acceptable to the Planning Official of maintenance of the relocated channel such that the flood-carrying capacity of the watercourse is not diminished.

16. *Changes to Special Flood Hazard Area*.

a. If a project will alter the BFE or boundaries of the SFHA, then the project proponent shall provide the community with engineering documentation and analysis regarding the proposed change. If the change to the BFE or boundaries of the SFHA would normally require a letter of map change, then the project proponent shall initiate within 180 days of the information being made available, and receive approval of, a conditional letter of map revision (CLOMR) prior to approval of the development permit. The project shall be constructed in a manner consistent with the approved CLOMR.

b. If a CLOMR application is made, then the project proponent shall also supply the full CLOMR documentation package to the floodplain administrator to be attached to the floodplain development permit, including all required property owner notifications.

K. *Variances and Minor Exceptions.* Variances as interpreted in the National Flood Insurance Program are based on the principle that they pertain to a physical piece of property. They apply to the land and are not personal in nature, do not pertain to the structure, its inhabitants, or economic or financial circumstances. The development standards contained in this section are required by the Federal Emergency Management Agency (FEMA) under the National Flood Insurance Program (NFIP) to protect life and property from flood damage.

Variances from the NFIP standards of this section shall meet the approval criteria and other requirements of this subsection in addition to any other applicable variance criteria or requirements. Variances from the NFIP standards of this section shall be processed as Type I or II variances or shoreline variances as appropriate, not as minor exceptions (VMC 20.720.070).

Variances or minor exceptions from other critical area standards (any standards of this chapter not in this section) shall meet the applicable criteria and follow the applicable procedures for the relief requested (VMC 20.720.070, or Chapter 20.290).

1. NFIP variances may be allowed:

    a. For historic structures. NFIP variances may be issued for the repair, reconstruction, rehabilitation or restoration of historic structures upon a determination that the proposed repair or rehabilitation will not preclude the structure's continued designation as a historic structure and the variance is the minimum necessary to preserve the historic character and design of the structure. This variance possibility is only available to those structures that are:

        i Listed individually in the National Register of Historic Places (a listing maintained by the Department of the Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the National Register;

        ii Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary to qualify as a registered historic district;

        iii Individually listed on a state inventory of historic places in states with historic preservation programs which have been approved by the Secretary of the Interior;

        iv Individually listed on a local inventory of historic places in communities with historic preservation programs that have been certified either:

            (A). By an approved state program as determined by the Secretary of the Interior; or

            (B). Directly by the Secretary of the Interior in states without approved programs.

        v The proposed development will not preclude the structure's continued designation as a historic structure.

b. From the elevation standard. An NFIP variance from the elevation standard may be issued for new construction and substantial improvements to be erected on a small or irregularly shaped lot contiguous to and surrounded by lots with existing structures constructed below the base flood elevation. As the lot size increases, the technical justification required for issuing the variance increases.

c. From the flood-proofing standard for nonresidential buildings. NFIP variances may be issued for nonresidential buildings to allow a lesser degree of flood-proofing than watertight or dry flood-proofing where it can be determined that such action:

i Will have low damage potential;

ii Complies with all other NFIP variance criteria except subsection (K)(1)(a)(ii) of this section;

iii Complies with subsection (J)(4) of this section, Water; subsection (J)(5) of this section, Waste; subsection (J)(7) of this section, Anchoring; and subsection (J)(9) of this section, Subdivisions.

d. For allowed development within the floodway. NFIP variances may be issued for development within a floodway only when the requirements of subsection (J)(1)(b) of this section are met.

2. *NFIP Variance Approval Criteria.* NFIP variances from elevation and flood-proofing standards, and for development in the floodway (subsections (K)(1)(a)(ii) through (K)(1)(a)(iv) of this section may be granted only if the applicant demonstrates that the requested action conforms to all of the following criteria:

a. The NFIP variance is the minimum necessary, considering the flood hazard, to afford relief.

b. The applicant has demonstrated good and sufficient cause.

c. Failure to grant the NFIP variance would result in exceptional hardship to the applicant. (Exceptional hardship for an NFIP variance is described in a FEMA memorandum dated July 22, 1986, entitled Resource Materials on NFIP Variance Criteria, available from the Planning Official)

d. Granting the NFIP variance will not result in increased flood heights or velocities, additional threats to public safety, significantly increased property damage potential, extraordinary public expense, or conflict with existing local laws or ordinances.

e. Demonstration that the following factors have been considered:

i The danger that materials may be swept onto other lands to the injury of others;

ii The danger to life and property due to flooding or erosion damage;

iii The susceptibility of the proposed facility and its contents to flood damage and the effect of such damage on the individual owner;

iv The importance of the services provided by the proposed facility to the community;

v The necessity to the facility of a waterfront location, where applicable;

vi The availability of alternative locations for the proposed use which are not subject to flooding or erosion damage;

vii The compatibility of the proposed use with existing and anticipated development;

viii The relationship of the proposed use to the comprehensive plan;

ix The safety of access to the property in times of flood for ordinary and emergency vehicles;

x The expected heights, velocity, duration, rate of rise, and sediment transport of the floodwaters and the effects of wave action, if applicable, expected at the site; and

xi The costs of providing governmental services during and after flood conditions, including maintenance and repair of facilities such as sewer, gas, electrical, stormwater, and water systems, and streets and bridges.

3. *Notices Required.* A notice to the applicant is required whenever a variance is approved, approved with conditions, or denied. Such notice shall include the decision and the reasons for the decision. When a variance from the elevation standard is approved or approved with conditions, such notice shall state that the structure will be permitted to be built with a lowest floor elevation below that normally required with respect to the base flood elevation and that the cost of flood insurance will be commensurate with the increased risk resulting from the reduced lowest floor elevation.

L. *Information to Be Obtained and Maintained*.

1. For all new and substantially improved structures and development, the Planning Official shall complete Section B of a current elevation certificate and obtain and record on that certificate:

a. For elevated (rather than flood-proofed) structures and development, the actual (as-built) elevation in relation to mean sea level of the lowest floor (including basement), and whether or not the structure contains a basement.

b. For nonresidential, flood-proofed structures, the elevation to which the structure was flood-proofed. All flood-proofing certifications shall also be maintained.

c. Maintain all records pertaining to development in frequently flooded areas subject to the provisions of this chapter for public inspection.

2. *Records of Variance Actions.* The Planning Official shall keep records of all variance actions and report any approved variances to the Federal Insurance Administrator upon request.

3. *Records of Appeal Actions.* The Planning Official shall keep records of all appeal actions.

20.720.130 Geologic hazard areas.

A. *Designation and Location*.

1. Designated or potential geologic hazard areas include landslide, seismic, and erosion hazard areas. With the exception of bank erosion hazard areas and fault rupture hazard areas, their potential locations are shown on maps available from the city of Vancouver, Clark County, and the state of Washington. Final designations shall be based on site conditions and other available data or information (see this chapter's general provisions section).

2. *Landslide Hazard Areas.* These areas are subject to landslides due to a combination of geologic, topographic, and hydrologic factors. They include any areas susceptible to landslide because of any combination of bedrock, soil, slope (gradient), slope aspect, structure, hydrology, or other factors as defined in Chapter 20.150 VMC. Landslides are areas shown as "areas of historic or active landslides," "areas of potential instability," and "areas of older landslide debris" on maps available from Clark County maps online ("Slope Stability of Clark County" report (1975) and "Geologic Map of Vancouver Quadrangle" map (1987)) and maps available through the DNR's Geologic Information Portal, including but not limited to the "Washington Geologic Survey-Protocol Landslide Mapping" and "Other Compiled Landslide Mapping" layers.

3. *Seismic Hazard Areas.* Seismic hazard areas include liquefaction, ground shaking amplification, and fault rupture hazard areas as designated below and defined in Chapter 20.150 VMC.

   a. *Liquefaction Hazard Areas.* Settlement and soil liquefaction conditions occur in areas underlain by cohesionless soils of low density, typically in association with a shallow groundwater table. The following are designated liquefaction hazard areas:

      i Areas with low to moderate, moderate, moderate to high, or high liquefaction susceptibility or peat deposits as indicated on liquefaction susceptibility maps from the DNR Geologic Information Portal as revised or superseded.

   b. *Ground Shaking Amplification Areas.* The following are designated ground shaking amplification hazard areas:

      i Site Classes C to D, D, D to E, E and F, as shown on the National Earthquake Hazard Reduction Program (NEHRP) Seismic Site Class layer available on the DNR Geologic Information Portal.

   c. *Fault Rupture Hazard Areas.* Potential fault rupture hazard areas are faults identified by the DNR Geologic Information Portal "Seismogenic Folds, Known or Suspected" and "Active Faults, Known or Suspected" layers; USGS, on geologic maps available from the Oregon Department of Geology and Mineral Industries (DOGAMI), Clark County maps online, or identified from other available data or in the field by a qualified professional and adjacent areas within 100 feet.

4. *Erosion Hazard Areas.* Erosion hazard areas include soil erosion and bank erosion hazard areas and as defined in Chapter 20.150 VMC. These are also areas that are likely to become unstable, such as bluffs, steep slopes, and areas with unconsolidated soils.

    a. *Soil Erosion Hazard Areas.* The following are designated soil erosion hazard areas:

        i *Severe or Very Severe Erosion Hazard Areas.* Areas with soils identified as having a severe or very severe erosion hazard by the 1972 U.S. Department of Agriculture (USDA) Soil Conservation Service Soil Survey of Clark County, Washington.

        ii *Bank Erosion Hazard Areas.* Bank erosion hazard areas are areas along lakes, streams, and rivers that are subject to regression or retreat due to lacustrine or fluvial processes and adjacent land within 100 feet.

B. *Performance Standards*.

1. *General Standards*.

    a. Critical facilities, as defined in Chapter 20.150 VMC, are prohibited in the following areas unless there is no other location available, a mitigation proposal is included in the development plan, and a critical areas report prepared by a qualified professional for geologically hazardous areas establishes that the area is safe for development for the type of facility proposed and the type of hazard:

        i Landslide hazard areas;

        ii Bank erosion hazard areas;

        iii Fault rupture hazard areas.

    b. Buffer width shall be measured on a horizontal plane from a perpendicular line established at all edges of the geologic hazard area (see Chapter 20.170 VMC).

    c. The applicant shall demonstrate that, during construction and for the anticipated life of the proposed development, the proposed use(s), activity(ies), and structure(s):

        i Are designed so that the hazard to the proposed project is eliminated or mitigated to a level equal to or less than pre-development conditions;

        ii Will not adversely impact other critical areas, if avoidable, given the type of critical areas involved and the characteristics of the site;

        iii Are designed to minimize or eliminate life safety risk; and

        iv Are certified by a qualified professional as safe as designed and under anticipated conditions.

2. *Landslide and Erosion Hazard Areas.* Development in nondisturbance areas shall be prohibited. In other areas, development in landslide and erosion hazard areas and their buffers shall be prohibited except where the applicant has demonstrated compliance with the following standards or requirements:

    a. Landslide hazard areas may be able to be mitigated through grading based on a critical areas report that demonstrates that the slope will be stabilized as described in additional critical areas report requirements for geologic hazards.

        i The critical areas permit shall be conditioned on a final inspection approval confirming that the grading and site are stable. At the applicant's expense, after site grading, the applicant shall:

            (A). Provide inspection specifications from the qualified professional who prepared the critical areas report; and

            (B). Inspect the grading and the site using an inspector acceptable to the city building official and submit a report to the city indicating whether the site is stable.

        ii Clearing, grading, uprooting, or otherwise impairing the soil stabilizing function of vegetation shall be prohibited during the wet season (November to May), except as authorized under a valid state or federal permit or a city Type I permit.

    b. Any required erosion mitigation work is to be performed by a certified erosion and sediment control lead in accordance with Ecology requirements.

    c. The requirements of Chapter 14.24 VMC, Erosion Control, shall be met.

    d. Drainage patterns shall not be altered such that potential for damage or risk to the proposed project, the geologic hazard area, or other critical areas or buffers is increased.

    e. Trails shall be for pedestrian and nonmotorized vehicular use only and shall be the minimum width necessary to meet applicable regulations.

    f. *Roads in Landslide and Bank Erosion Hazard Areas.* A road through or across a landslide or bank erosion hazard area shall meet the standards of subsection (B)(2) of this section and shall not be:

        i The sole access for a proposed subdivision (not including short subdivision) or critical facility;

        ii Longer than 200 feet; or

        iii Steeper than a 15 percent grade.

    g. *Markers and Signs in Landslide Hazard Areas*.

i The boundary at the outer edge of the furthest of the landslide hazard area, nondisturbance area (see this chapter's additional critical areas report requirements for geologic hazard areas), or buffer shall be identified with temporary signs prior to any site alteration.

ii These provisions may be modified by the Planning Official as necessary to ensure protection of people and structures from the hazard.

h. *Stabilization in Bank Erosion Hazard Areas*.

i Bank stabilization measures may be employed to protect an existing structure when a critical areas report conclusively demonstrates all of the following:

(A). Bank erosion threatens an established use or existing structure(s) within a three-year timeframe;

(B). The threatened use or structure(s) cannot be relocated landward of any nondisturbance area (subsection (C)(7)(a)(ii) of this section);

(C). Bank stabilization measures will not cause a significant adverse impact on upstream or downstream properties or an impact that cannot be mitigated without developing bank stabilization measures for those properties; and

(D). Bank stabilization measures will not cause a significant adverse impact on a fish and wildlife habitat conservation area protected by this chapter.

i. When bank stabilization is allowed, it shall be accomplished using beach nourishment, bioengineering (soft armoring) techniques, or a combination of the two. Other techniques may be used when an approved critical areas report demonstrates conclusively that beach nourishment, bioengineering (soft armoring) techniques, or a combination of the two will not provide sufficient protection for the remaining useful life of the structure(s) to be protected.

j. *Buffer.* The following regulations apply to landslide and bank erosion hazard area buffers:

i *Buffer widths*.

(A). No buffer is required for soil erosion hazard areas.

(B). The minimum buffer width from the top and bottom of slope for landslide and bank erosion hazard areas shall be equal to two times the slope height or as recommended by a qualified professional in a geotechnical report.

(C). A larger buffer width may be required for landslide and bank erosion hazard areas at the discretion of the Planning Official when:

(1). The adjacent land is susceptible to severe erosion and erosion control measures will not effectively prevent adverse impacts;

(2). The area has a severe risk of slope failure or downslope stormwater drainage impacts;

(3). The area is directly adjacent to a riparian area, or wetland; or

(4). Recommended in an approved critical areas report.

ii Buffers may be included in nondisturbance areas (subsection (C)(7)(a)(ii) of this section) and required planting and maintenance activities may be undertaken within them.

iii The buffer around landslide and bank erosion hazard areas shall be vegetated and shall be maintained by the property owner. New plantings shall consist of native vegetation.

iv No alteration to the buffer that involves clearing of vegetation shall be undertaken without an erosion control plan approved pursuant to the provisions of Chapter 14.24 VMC, Erosion Control, and this chapter.

3. *Seismic Hazard Areas*.

a. *Liquefaction or Dynamic Settlement and Ground Shaking Amplification Hazard Areas.* All building structures in liquefaction or ground shaking amplification hazard areas shall comply with the requirements of VMC Title 17, Buildings and Construction. No buffer is required for liquefaction or ground shaking amplification hazard areas.

b. *Fault Rupture Hazard Areas.*

i A road through or across a fault rupture hazard area shall not be:

(A). The sole access for a proposed subdivision (not including short subdivision) or critical facility;

(B). Longer than 200 feet; or

(C). Steeper than a 15 percent grade.

ii *Buffer*.

(A). The buffer width shall be the greater of the following distances:

(1). Fifty feet from all edges of a fault rupture hazard area, except where critical facilities are involved, the minimum buffer distance shall be 100 feet (see VMC 20.170.030(L)); or

(2). The minimum distance recommended in an approved critical areas report.

(B). A larger buffer width may be required when the Planning Official determines that the buffer is not adequate to protect the proposed development.

iii New structures for human habitation shall be prohibited within fault rupture hazard areas and buffers.

C. *Additional Critical Areas Report Requirements.* In addition to the requirements of VMC 20.720.050, the following are critical areas report requirements for development proposals in potential geologic hazard areas. These requirements may be adjusted as appropriate by the Planning Official. The critical areas report will result in a conclusion as to whether the potential geologic hazard area is an actual geologic hazard area and would be subject to a permit (see subsection (C)(6) of this section). If it is, the critical areas report requires the following additional information, mapping, and analysis (see subsection (C)(7) of this section):

1. Identification of the site and project area (defined at Chapter 20.150 VMC); topography of the site in two-foot contours (or other increment at the discretion of the Planning Official); planned gas, power, cable, fiber optic, telephone, sewer, water, and stormwater management facilities, wells, on-site septic systems, dikes, levees; and existing structures on the site plan required by VMC 20.720.050;
2. Detailed review of field investigations, published data and references, data and conclusions from past geologic studies or investigations, site-specific measurements, tests, investigations, or studies, and the methods of data analysis and calculations that support the results, conclusions, and recommendations;
3. Field investigation and evaluation of the areas on landslide, erosion, liquefaction or dynamic settlement, ground shaking amplification, bank erosion hazard areas and fault rupture hazard areas on or within 100 feet of the site;
4. A description of the surface and subsurface geology, hydrology, drainage patterns, soils, and vegetation for liquefaction or dynamic settlement, ground shaking amplification, fault rupture, soil erosion hazards, landslide, and bank erosion hazard areas on or within 100 feet of the site;
5. Identification of any hazard area indicators that were found on site for liquefaction or dynamic settlement, ground shaking amplification, fault rupture, and soil erosion hazards areas and on or within 100 feet of the site for landslide and bank erosion hazard areas;
6. Conclusion as to whether there is a geologic hazard area on site or within 100 feet of the site; and
7. If a geologic hazard is found to exist on site or if a landslide or bank erosion hazard is found to exist on or within 100 feet of the site, the report must include the following:
    a. Labeling and showing the following on the site plan required by VMC 20.720.050:
        i The location(s), extent, and type(s) of geologic hazard area(s) identified;

ii The location(s) and extent of any area(s) that must be left undisturbed to protect the proposed development from damage or destruction and to protect the hazard area(s) from the impacts of the proposed development;

iii The boundaries of the area that may be disturbed;

iv The dimension of the closest distance(s) between the geologic hazard area(s) and nondisturbance area and the project area;

v For bank erosion hazard areas, show these areas, boundaries, and dimensions based upon natural processes and, if applicable, proposed bank stabilization measures; and

vi The recommended buffer for bank erosion hazard areas.

b. Analysis of the erosion processes on site for soil erosion hazard areas and on or within 100 feet of the site for bank erosion hazard areas;

c. Evaluation of the impact of the geologic hazard area(s) on the proposed development, other properties, and other critical areas, as follows:

i *Landslide Hazard Areas.* The impact of the run-out hazard of landslide debris from both upslope and downslope shall be included in the evaluation.

ii *Bank Erosion Hazard Areas.* Evaluation of impacts on other properties shall include properties both upstream and downstream of the subject property.

d. Evaluation of the impact of the proposed development on the geologic hazard area(s).

e. Assessments and conclusions regarding geologic hazard(s) for both existing and proposed (post-development) site conditions. The ultimate build-out scenarios must be considered and addressed in cases such as land division and master planning where build-out is not scheduled to occur as a direct or immediate result of project approval.

f. Written discussion of:

i The risk of damage or destruction from the geologic hazard(s) with respect to human health and safety; infrastructure; the proposed development; other properties (both upstream and downstream for bank erosion hazard areas); and other critical areas; and

ii Whether and to what degree the proposed development would increase the risk from the geologic hazard(s), such as the occurrence of a landslide or the rate of regression.

g. Recommendations for mitigation of impacts to protect:

i Human health and safety;

ii Infrastructure;

iii The proposed development;

iv Other properties (both upstream and downstream for bank erosion hazard areas);

v Other critical areas; and

vi The hazard area during construction and for the anticipated life of the proposed development. The ultimate build-out scenarios must be considered and addressed in cases such as land division and master planning where build-out is not scheduled to occur as a direct or immediate result of project approval.

h. A demonstration of how the standards of this subsection applicable to each geologic hazard area will be met.

20.720.140 Wetlands.

A. *Designating and Rating Wetlands*.

1. *Designating Wetlands.* Wetlands are areas that have been designated in accordance with the 1987 Federal Wetland Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains Valleys and Coast Region Version 2.0 (2010 or as further updated) and are defined in Chapter 20.150 VMC. Wetlands are subject to a local government's regulatory authority if they meet the definition of wetlands, including non-federally regulated (isolated) wetlands. Final designations shall be based on site conditions as documented in a wetland critical areas report, and other available data or information (see VMC 20.720.020(C)(1)).

2. *Wetland Ratings.* Wetlands shall be rated according to the Ecology wetland rating system, Ecology Publication No. 23-06-009, Washington State Wetland Rating System for Western Washington: 2014 Update, published July 2023, or as revised by Ecology. The rating system document contains the definitions and methods for determining if the criteria below are met. The most recent version of the rating system form must be used.

a. Wetland Rating Categories.

i *Category I.* Category I wetlands are:

(A). Wetlands of high conservation value that are identified by scientists of the Washington Natural Heritage Program of the DNR;

(B). Bogs;

(C). Mature and old-growth forested wetlands larger than one acre;

(D). Wetlands that perform functions at a high level, scoring 23 points or more.

ii *Category II.* Category II wetlands function at a moderately high function and are difficult, though not impossible, to replace, scoring between 20 and 22 points.

iii *Category III.* Category III wetlands have generally been disturbed in some way and are often less diverse or more isolated from other natural resources in the landscape than Category II wetlands. Category III wetlands:

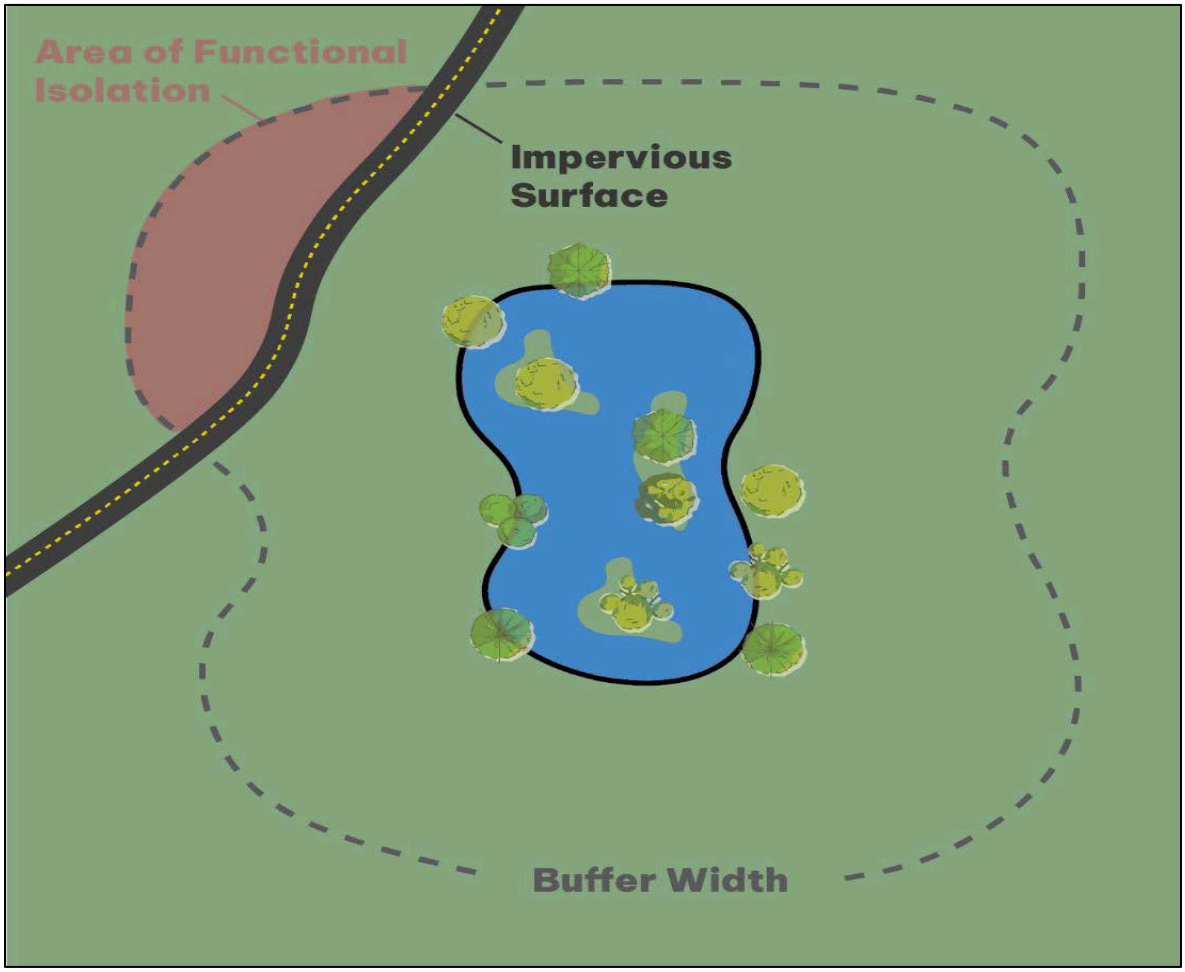
(A). Have a moderate level of functions, scoring between 16 and 19 points; and

(B). Can often be adequately replaced with a well-planned mitigation project.

iv *Category IV.* Category IV wetlands have the lowest levels of functions (scoring fewer than 16 points) and are often heavily disturbed. These are wetlands that should be able to be replaced, or in some cases improved. However, experience has shown that replacement cannot be guaranteed in any specific case. These wetlands may provide some important functions, and should be protected to some degree.

B. *Development activities that functionally or physically isolate the wetland buffer.* When existing impervious surfaces or other built structures functionally or physically isolate the wetland buffer from the water body or wetland, the regulated wetland buffer shall extend landward from the ordinary high water mark (OHWM) or channel migration zone (CMZ), whichever is greater, and terminate at the waterward edge of the impervious surface or manmade structure. Development activities that occur within the area of functional isolation, or further landward, are exempt from the requirement to obtain a critical areas permit.

FIGURE 20.720.140-1. FUNCTIONAL ISOLATION



The obstruction causing the physical isolation shall be significant enough in size and stature that protective buffers or other mitigation measures cannot reasonably restore ecological functions or benefits. The Planning Official may rely on a site visit, aerial photographs, other evidence provided by the applicant or the applicant's qualified professional, and consultation with the Washington Department of Fish and Wildlife (WDFW) in making a determination to reduce the width of the wetland buffer based on functional and/or physical isolation. The following obstructions shall not constitute functional isolation:

1. Trails, paths, or sidewalks;
2. Minor accessory structures;
3. Driveways or drive aisles;
4. Subsurface utilities.

C. *Performance Standards*.

1. *General Requirements.* Development or clearing activities shall protect the functions of wetlands and wetland buffers on the site. Activities shall result in no net loss of wetland or buffer functions. Protection may be provided by avoiding (preferred) or minimizing and mitigating as described in the general critical areas performance standards (VMC 20.720.060).

a. *Uses in Wetlands*.

i In Category I wetlands, only the following activities may be allowed:

(A). Infrastructure or utilities that cannot feasibly be located outside of the wetland, that minimize the impact, that mitigate for any unavoidable impact to functions, and have received authorization from applicable federal and state regulating agencies;

(B). Trails and wildlife viewing structures; provided, that the trails and structures minimize the impact, are located in the outer 25 percent of the buffer, and are constructed so that they do not interfere with wetland hydrology and do not result in increased sediment entering the wetland;

(C). Enhancement and restoration activities aimed at protecting the soil, water, vegetation, or wildlife; and

(D). Repair and maintenance of legally established nonconforming uses or structures, provided they do not increase the degree of nonconformity.

ii In Category II wetlands, only the following activities may be allowed:

(A). Activities allowed in Category I wetlands pursuant to subsection (C)(1)(a)(i) of this section;

(B). A water-dependent, water-related or water-enjoyment activity where there are not feasible alternatives that would have less impact on the wetland. Where non-water-dependent, related, or enjoyment activities are proposed, it shall be presumed that alternative locations are available, and activities and uses shall be prohibited unless the applicant demonstrates that the basic project purpose cannot reasonably be accomplished and successfully avoid or result in less adverse impacts on a wetland on another site or sites in the city or Vancouver urban growth area.

iii In Category III wetlands, only the following activities may be allowed:

(A). Activities allowed in Category II wetlands pursuant to subsection (C)(1)(a)(ii) of this section;

(B). Stormwater management facilities. A Category III wetland can be physically or hydrologically altered to meet the requirements of a low impact development (LID) methodology or flow control BMP, if all of the following criteria are met:

(1). If proposed, an LID BMP is determined to be feasible through a site-specific characterization;

(2). The wetland has a habitat score of three to five points;

(3). There will be no net loss of functions and values of the wetland;

(4). The wetland does not contain a breeding population of any native amphibian species;

(5). The hydrologic functions of the wetland can be improved as outlined in questions 3, 4, and 5 of Chart 4 and questions 2, 3, and 4 of Chart 5 in Selecting Mitigation Sites Using a Watershed Approach (Western Washington Ecology Publication No. 09-06-032 or 10-06-007, or as revised); or the wetland is part of a restoration plan intended to achieve restoration goals identified in the city of Vancouver's shoreline master program or a local or regional watershed plan;

(6). The wetland lies in the natural routing of the runoff, and the discharge follows the natural routing;

(7). All regulations regarding stormwater and wetland management are followed, including in this chapter and Chapter 14.24 VMC, Erosion Control; and

(8). Modifications that alter the structure of a wetland or its soils will require permits. Existing functions and values that are lost will need to be compensated for in accordance with the requirements of this chapter.

(C). Other activities may be allowed if the applicant demonstrates that the basic project purpose cannot reasonably be accomplished and avoid or result in less adverse impacts on a wetland or its buffer than alternative uses or designs (including reduction in the size, scope, configuration or density of the project).

iv In Category IV wetlands, activities and uses that result in impacts may be permitted in accordance with an approved critical areas report and mitigation plan if the proposed activity is the only reasonable alternative that will accomplish the applicant's objectives. Full mitigation for the loss of acreage and functions shall be provided under the terms established pursuant to subsection (C)(2) of this section.

(A). If stormwater management facilities are proposed, they must meet the requirements of an LID or flow control BMP as specified for Category III wetlands.

b. *Wetland Buffers*.

i *Required Buffer Widths.* Standard buffer widths are measured in feet from the edge of the wetland (see VMC 20.170.030(B) and (H)). Applicants are required to implement the wetland buffer widths by wetland category as shown in Table 20.720.140-1.

ii If the applicant is unable to implement the full width buffers from Table 20.720.140-1 and avoid impacts as a result of proposed development, the planning director shall permit the applicant to use the alternative buffer widths in subsections (C)(1)(b)(v)(B) and (C)(1)(b)(v)(C) of this section, if the applicant has first demonstrated they have met the following criteria:

(A). The applicant has met the mitigation sequencing in VMC 20.720.060(A) through (E).

(B). The applicant shall provide a minimum of two alternative site designs and layouts to demonstrate that impacts cannot be avoided or be reduced to result in less impacts. The planning director may approve reductions to numerical standards including parking and setbacks under the minor exception process in VMC 20.720.070 to avoid or reduce impacts.

iii The required and alternative buffer widths assume that the buffer is vegetated with a native plant community appropriate for the ecoregion. If the existing buffer is unvegetated, sparsely vegetated, and/or vegetated with invasive species that do not perform needed functions, the buffer must either be planted to create the appropriate native plant community or be widened to ensure that the buffer provides adequate functions to protect the wetland.

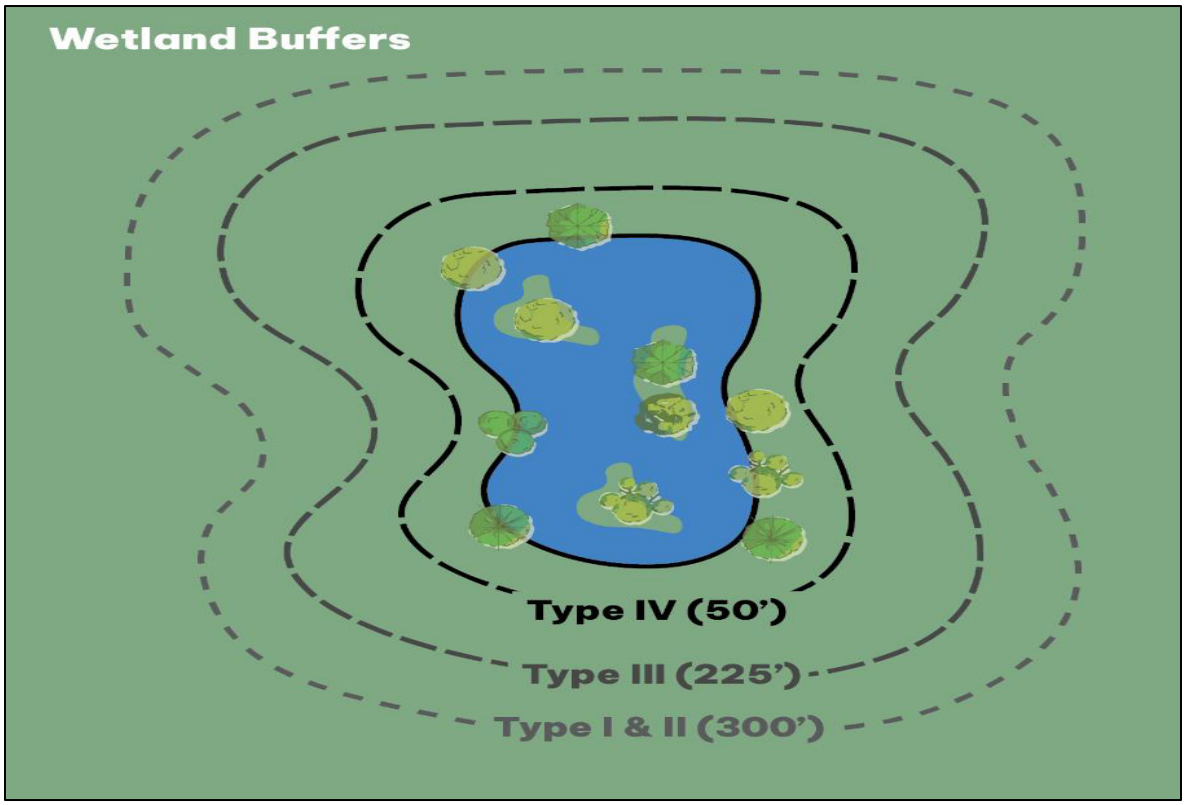
iv If the buffer is functionally isolated by an existing impervious surface or built structure, the remaining buffer area must be revegetated with native species, but the buffer does not need to be widened to exceed widths greater than those listed in Tables 20.720.140-1, 20.720.140-2, and 20.720.140-4.

(A). Required buffers based on wetland category – see Table 20.720.140-1.

TABLE 20.720.140-1. WETLAND BUFFER WIDTH REQUIREMENTS

Wetland	Buffer Width
I	300
II	300
III	225
IV	50

FIGURE 20.720.140-2. WETLAND BUFFER WIDTH REQUIREMENTS



(B). Alternative 1 wetland buffers: buffers based on wetland category, wetland type, and habitat score and providing a habitat corridor and implementing minimization measures.

(1). In order for an applicant to use the buffer widths of Table 20.720.140-2, the applicant must provide a habitat corridor as outlined in this subsection and implement the impact minimization measures listed in Table 20.720.140-3. Not all impact minimization measures are applicable. An undisturbed vegetated corridor at least 100 feet wide must be provided between the wetland and another priority area for preservation that meets the following:

(a). A legally protected, high-functioning vegetated area (priority habitats; other compensation sites; wildlife areas/refuges; or national, county, and state parks that have management plans with identified areas designated as natural, natural forest, or natural area preserve);

(b). An area that is the site of a watershed project identified within and fully consistent with a watershed plan, as these terms are defined by RCW 89.08.460;

(c). An area where development is prohibited under the provisions of the local shoreline master program;

(d). An area with equivalent habitat quality that has conservation status in perpetuity, in consultation with WDFW;

(e). The corridor is permanently protected for the entire distance between the wetland and the legally protected area by a conservation easement, deed restriction, or other legal means;

(f). Presence of the shoreline or priority habitat must be confirmed by a qualified biologist or the Planning Official;

(g). If a wetland scores five or fewer habitat points, only the impact minimization measures listed in Table 20.720.140-3 are required in order to use the buffers in Table 20.720.140-2; or

(h). If an applicant does not apply the mitigation measures in Table 20.720.140-3 and is unable to provide a protected corridor, then the buffers in Table 20.720.140-1 or 20.720.140-4 shall be used.

TABLE 20.720.140-2. ALTERNATIVE 1: WETLAND BUFFER WIDTH REQUIREMENTS

Category of Wetland	Habitat Score 3 to 5 Points (Corridor Not Required)	Habitat Score 6 to 7 Points	Habitat Score 8 to 9 Points
Category I: Bogs and Wetlands of High Conservation Value	NA	NA	225 feet
Category I: Forested	75 feet	110 feet	225 feet
Category I or II: Based on Rating of Wetland Functions (and not listed above)	75 feet	110 feet	225 feet
Category III: All Types	60 feet	110 feet	225 feet
Category IV: All Types	40 feet	40 feet	40 feet

Note: Special characteristics are defined in the Washington State Wetland Rating System for Western Washington: 2014 Update, published July 2023, or as revised by Ecology.

TABLE 20.720.140-3. IMPACT MINIMIZATION MEASURES REQUIRED TO IMPLEMENT ALTERNATIVE 1 WETLAND BUFFERS

Examples of Disturbance	Uses and Activities that Cause the Disturbance	Examples of Measures to Minimize Impacts
Lights	Parking lots, warehouses, manufacturing, residential, recreational	Direct lights away from wetland. Only use lighting where necessary for public safety and keep lights off when not needed. Use motion-activated lights. Use full cut-off filters to cover light bulbs and direct light only where needed. Limit use of blue-white colored lights in favor of red-amber hues. Use lower-intensity LED lighting. Dim light to the lowest acceptable intensity.

Examples of Disturbance	Uses and Activities that Cause the Disturbance	Examples of Measures to Minimize Impacts
Noise	Manufacturing and other industrial, residential, commercial, recreational	Locate activity that generates noise away from wetland. Construct a fence to reduce noise impacts on adjacent wetland and buffer. Plant a strip of dense shrub vegetation adjacent to wetland buffer.
Toxic runoff	Parking lots, roads, manufacturing, residential, application of agricultural or landscaping chemicals, landscaping	Route only treated runoff to a wetland and route untreated runoff away from wetland while ensuring wetland is not dewatered. Establish covenants limiting use of toxic chemicals within 150 feet of wetland. Apply integrated pest management.
Stormwater runoff	Parking lots, roads, residential, commercial/industrial, recreational, landscaping/lawns, and other impermeable surfaces/compacted soils	Retrofit stormwater detention and treatment for roads and existing adjacent development. Prevent channelized or sheet flow from lawns that directly enters the buffer. Infiltrate or treat, detain, and disperse new runoff from impervious surfaces and lawns.
Change in water regime	Impervious surfaces, lawns, tilling	Infiltrate or treat, detain, and disperse new runoff into buffer.
Pets and human disturbance	Residential, recreational, commercial, industrial	Plant dense vegetation around buffer, such as rose or hawthorn, to delineate buffer edge and discourage disturbance. Place wetland and its buffer in a separate tract.

Examples of Disturbance	Uses and Activities that Cause the Disturbance	Examples of Measures to Minimize Impacts
		Place signs around the wetland buffer every 50 to 200 feet and for subdivisions place signs at the back of each residential lot. When platting new subdivisions, locate greenbelts, stormwater facilities, and other lower intensity uses adjacent to wetland buffers.
Human disturbance	Residential, commercial, industrial	Plant dense vegetation around buffer, such as rose or hawthorn
Dust	Tilled fields, roads	Utilize best management practices to control dust.

(C). Alternative 2 wetland buffer widths: buffers based on wetland category wetland type, and habitat score (see Table 20.720.140-4) without providing a habitat corridor or minimization measures as outlined in subsection (C)(1)(b)(iv)(B) of this section.

TABLE 20.720.140-4. ALTERNATIVE 2 WETLAND BUFFER WIDTH REQUIREMENTS

Category of Wetland	Habitat Score 3 to 5 Points (Corridor Not Required)	Habitat Score 6 to 7 Points	Habitat Score 8 to 9 Points	Buffer Width Based on Special Characteristics
Category I: Bogs and Wetlands of High Conservation Value	NA	NA	300 feet	250 feet
Category I: Forested	100 feet	150 feet	300 feet	NA
Category I or II: Based on rating of wetland functions (and not listed above)	100 feet	150 feet	300 feet	NA
Category III: All Types	80 feet	150 feet	300 feet	NA
Category IV: All Types	50 feet	50 feet	50 feet	50 feet

v *Wetland Buffer Width Averaging.* The Planning Official may allow modification of the standard wetland buffer width in accordance with an approved critical areas report by averaging buffer widths. Buffer width averaging shall not be used in combination with buffer width reduction or a minor exception (VMC 20.720.070). Averaging of buffer widths (see VMC 20.170.080(B)(2)) may only be allowed when implementing the impact minimization measures, as applicable, in Table 20.740.140-3 and where a qualified professional wetland scientist demonstrates that:

(A). Such averaging will not reduce wetland functions or functional performance;

(B). The wetland varies in sensitivity due to existing physical characteristics, or the character of the buffer varies in slope, soils, or vegetation, and the wetland would benefit from a wider buffer in places and would not be adversely impacted by a narrower buffer in other places;

(C). The total area contained in the buffer area after averaging is no less than that which would be contained within the standard buffer; and

(D). The buffer width is not reduced at any point by more than 25 percent of the standard width and is no less than 30 feet wide.

vi *Buffer Maintenance.* Except as otherwise specified or allowed in accordance with this chapter, wetland buffers shall be maintained and fully vegetated according to the approved critical areas permit.

vii *Buffer Uses.* The following uses may be permitted within a wetland buffer in accordance with the review procedures of this chapter; provided, they are not prohibited by any other applicable laws or regulations and they are conducted in a manner so as to minimize impacts to the buffer and the wetland:

(A). Activities allowed under the same terms and conditions as in the associated wetlands pursuant to subsection (C)(1)(a) of this section;

(B). Enhancement and restoration activities aimed at protecting the soil, water, vegetation or wildlife.

(1). Removal of invasive plant species shall be restricted to hand removal. All removed plant material shall be taken away from the site and appropriately disposed of. Plants that appear on the city's noxious weed list should be handled and disposed of according to a noxious weed control plan appropriate to that species. Revegetation with appropriate native species at natural densities is allowed in conjunction with removal of invasive plant species;

(C). Passive recreation facilities, including trails and wildlife viewing structures; provided, that the trails and structures are constructed with a surface that does not interfere with wetland hydrology.

(1). Trails shall be located in the outer 25 to 50 percent of the buffer, when feasible;

(D). Stormwater management facilities are not allowed in Category I or II wetland buffers. Stormwater management facilities must meet the requirements of an LID or flow control BMP as specified for uses in Category III wetlands;

(E). Educational and scientific research activities;

(F). Normal and routine maintenance and repair of any existing public or private facilities within an existing right-of-way; provided, that the maintenance or repair does not increase the footprint or use of the facility or right-of-way;

(G). The harvesting of wild crops in a manner that is not injurious to natural reproduction of such crops; and provided, that the harvesting does not require tilling of soil, planting of crops, chemical applications, or alteration of the wetland by changing existing topography, water conditions, or water sources; and

(H). Drilling for utilities/utility corridors under a buffer, with entrance/exit portals located completely outside of the wetland buffer boundary; provided, that the drilling does not alter the groundwater connection to the wetland or percolation of surface water down through the soil column.

(1). Specific studies by a hydrologist are necessary to determine whether the groundwater connection to the wetland or percolation of surface water down through the soil column would be disturbed.

c. Temporary and permanent markers and signs for wetlands.

i Temporary and permanent markers and signs are installed in compliance with the requirements of VMC 20.720.020, General Provisions.

2. *Compensatory Mitigation.* Compensatory mitigation for impacts to wetlands shall be provided pursuant to VMC 20.720.060 and shall be consistent with Ecology's Wetland Mitigation in Washington State, Part 1: Agency Policies and Guidance, Version 2, Ecology Publication No. 21-06-003 April 2021, and Part 2: Developing Mitigation Plans, Version 1, Ecology Publication No. 06-06-011b, March 2006, or as revised by Ecology.

Watersheds are defined in Chapter 20.150 VMC.

a. *Mitigation for Lost or Affected Functions.* Compensatory mitigation actions shall address functions affected by the alteration to achieve functional equivalency or improvement and shall provide wetland or buffer functions similar to those lost, except when:

i The lost wetland or buffer provides minimal functions as determined by a site-specific functional assessment, and the proposed compensatory mitigation action(s) will provide equal or greater functions or will provide functions shown to be limited within a watershed through a formal Washington State watershed assessment plan or protocol; or

ii Out-of-kind replacement will best meet formally identified watershed goals, such as replacement of historically diminished wetland types.

b. *Compensatory Mitigation Actions.* If, through mitigation sequencing in accordance with VMC 20.720.060, it is determined that compensatory mitigation is necessary, the applicant must provide an alternative approach to compensation. Compensation is prioritized as follows:

i Mitigation bank credits: Allows applicants to compensate for wetland loss by purchasing credits from a bank that is commissioned to restore, create, enhance, or preserve wetland areas in providing compensatory mitigation for authorized impacts to wetlands;

ii In-lieu fee program credits: Allows applicants to compensate for wetland losses by paying a fee to a third party, such as a government agency or conservation organization, where the fee is used to ensure protection, creation, and enhancement of wetlands;

iii Permittee-responsible mitigation (PRM) under a watershed approach;

iv PRM that is on site and in-kind;

v PRM that is off site and/or out-of-kind.

c. PRM includes the following approaches:

i *Creation.* The manipulation of the physical, chemical, or biological characteristics present to develop a wetland where a biological wetland did not previously exist. Activities typically involve excavation of upland soils to elevations that will produce a wetland hydroperiod, create hydric soils, and support the growth of hydrophytic plant species. Creation results in a gain in wetland acres and functions.

ii *Reestablishment.* The manipulation of the physical, chemical or biological characteristics of a site with the goal of returning natural or historic functions and environmental processes to a former wetland. Activities could include removing fill material, plugging ditches or breaking drain tiles. Reestablishment results in a gain in wetland acres and functions.

iii *Rehabilitation.* The manipulation of the physical, chemical, or biological characteristics of a site with the goal of repairing natural or historic functions and processes of a degraded wetland. Activities could involve breaching a dike to reconnect wetlands to a floodplain, restoring tidal influence to a wetland, or breaking drain tiles and plugging drainage ditches. Rehabilitation results in a gain in wetland functions but not in wetland acres.

iv *Preservation.* The removal of a threat to, or preventing the decline of, wetland conditions by an action in or near a wetland. This term includes activities commonly associated with the protection and maintenance of wetlands through the implementation of appropriate legal and physical mechanisms (such as recording conservation easements and providing structural protection like fences and signs). Preservation does not result in a gain of wetland area and functions (but may result in a gain in functions over the long term).

v *Enhancement.* The manipulation of the physical, chemical, or biological characteristics of a biological wetland to increase or improve specific functions or to change the growth stage or composition of the vegetation present.

Enhancement is undertaken for specified purposes such as water quality improvement, floodwater retention or wildlife habitat. Activities typically consist of planting vegetation, controlling nonnative or invasive species, modifying site elevations to result in open water ponds, or some combination of these. Enhancement results in a change in certain wetland functions and can lead to a decline in other wetland functions. It does not result in a gain in wetland acres.

vi *Mixed Compensatory Mitigation.* Involves more than one of the listed types of compensatory mitigation.

d. Mitigation Ratios.

i Replacement Ratios.

(A). The replacement ratios shall apply to wetland mitigation that: (1) is for the same hydrogeomorphic subclass (e.g., riverine flow-through, depressional outflow, or flats), and Cowardin class (e.g., palustrine emergent, palustrine forested or estuarine wetlands); (2) is on site; (3) is in the same category; (4) is implemented prior to or concurrent with alteration; and (5) has a high probability of success.

(B). *Mitigation Ratios.* Mitigation ratios are as follows (see subsection (C)(2)(b) of this section for definitions of mitigation actions):

TABLE 20.720.140-5. MITIGATION REPLACEMENT RATIOS

Wetland Category and Type	Reestablishment or Creation	Rehabilitation	Preservation	Enhancement
Category I forested	6:1	12:1	24:1	24:1
Bog	NA	NA	24:1	NA
Wetlands of High Conservation Value	Consult with DNR	Consult with DNR	24:1	Consult with DNR
Category II	3:1	6:1	12:1	12:1
Category III	2:1	4:1	8:1	8:1
Category IV	1.5:1	3:1	6:1	6:1

ii *Adjustment of Replacement Ratios.* The Planning Official may adjust the replacement ratios to compensate for deviations from the requirements under this section, subject to the following:

(A). In most cases, adjustments to the replacement ratios will increase the required amount of mitigation. The required mitigation may be decreased under exceptional circumstances – for example, if programmatic out-of-kind mitigation yields watershed-scale benefits that would not be realized from in-kind mitigation, or if out-of-kind mitigation would protect irreplaceable wetlands.

e. *Mitigation Timing.* The mitigation shall be implemented prior to or concurrent with alterations. If mitigation is implemented after alteration is allowed, the Planning Official may require additional mitigation to compensate for temporal losses of wetland functions.

f. *Buffers for Mitigation Wetlands.* Refer to Wetland Buffer Tables 20.720.140-1 through 20.720.140-4.

g. *Wetland Mitigation Banks.*

i Credits from a wetland mitigation bank may be approved for use as mitigation for unavoidable impacts to wetlands when:

(A). The bank is certified under Chapter 173-700 WAC;

(B). The Planning Official determines that the wetland mitigation bank provides appropriate mitigation for the authorized impacts; and

(C). The proposed use of credits is consistent with the terms and conditions of the bank's certification.

ii Replacement ratios for projects using bank credits shall be consistent with replacement ratios specified in the bank's certification.

iii Credits from a certified wetland mitigation bank may be used to compensate for impacts located within the service area specified in the bank's certification. In some cases, bank service areas may include portions of more than one adjacent drainage basin for specific wetland functions.

D. *Additional Critical Areas Report Requirements.* A critical areas report for wetlands shall be prepared according to the Washington State Wetland Rating System for Western Washington – 2014 Update, Ecology Publication No. 23-06-009, Washington State Wetland Rating System For Western Washington: 2014 Update, published October 2014 (updated July 2023) or as revised by Ecology. The critical areas report shall contain an analysis of the wetlands including the following site- and proposal-related information:

1. A written assessment, data sheets, and accompanying maps of any wetlands or buffers on the site, including the following information:

a. Hydrogeomorphic (HGM) subclassification and Cowardin class;

b. Wetland category;

c. Wetland delineation and required buffers;

d. Existing wetland acreage;

e. Vegetative, faunal, and hydrologic characteristics;

f. Soil types and substrate conditions;

g. Topographic elevations, at one-foot contours; and

h. A discussion of the water sources supplying the wetland and documentation of hydrologic regime (locations of inlet and outlet features, water depths throughout the wetland, evidence of recharge or discharge, or evidence of water depths throughout the year, including drift lines, algal layers, moss lines, and sediment deposits).

2. Functional evaluation for the wetland and buffer using Ecology's most current approved data sheets method and including the reference of the method and all data sheets.

3. Proposed mitigation, if needed, including a discussion of alternatives and trade-offs of the various alternatives (for example, where enhancement for one function would adversely affect another) and a written description and accompanying maps of the mitigation area, including the following information:

a. Existing and proposed wetland acreage;

b. Existing and proposed vegetative and faunal conditions;

c. Surface and subsurface hydrological conditions of existing and proposed wetlands and hydrologically associated wetlands, including an analysis of existing hydrologic regime and proposed hydrologic regime for enhanced, created, or restored mitigation areas;

d. Relationship to lakes, streams, and rivers in the watershed;

e. Soil type and substrate conditions;

f. Topographic elevations, at one-foot contours;

g. Required wetland buffers including existing and proposed vegetation;

h. Identification of the wetland's contributing area; and

i. A functional assessment of proposed mitigation to ensure no net loss of shoreline ecological function.

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CHAPTER 20.730
SHORELINE MANAGEMENT AREA

Sections:

20.730.010 Purpose.

20.730.020 Establishment of Boundaries.

20.730.030 Regulation of Uses.

20.730.040 Special Standards.

20.730.050 Administration and Enforcement.

20.730.060 Shoreline Permit Procedures.

20.360.070 Changes, Amendments, or Revisions.

20.730.010 Purpose.

General. The purpose of this Chapter is to implement the policies and procedures set forth by the Shoreline Management Act of 1971, as amended, and all applicable provisions contained in the Washington Administrative Code.

20.730.020 Establishment of Boundaries.

Establishment of boundaries. The provisions of the Shoreline Management Master Program together with the map entitled "Shoreline Environment Designations" shall define the boundaries of the Shoreline Management Area.

20.730.030 Regulation of Uses.

Regulation of uses. The Shoreline Management Master Program shall be used to regulate uses within the Shoreline Management Area.

20.730.040 Special Standards.

Special standards. The Shoreline Management Master Program shall provide development standards for uses within the Shoreline Management Area.

20.730.050 Administration and Enforcement.

Administration and enforcement. The Shoreline Management Master Program shall be used to administer and enforce the regulations within the Shoreline Management Area.

20.730.060 Shoreline Permit Procedures.

Permits. Shoreline permits shall be processed according to the procedures contained in 20.210 VMC Decision-Making Procedures, in conjunction with Shoreline Management Master Program permitting procedures where applicable, within the Shoreline Management Area.

20.730.070 Changes, Amendments, or Revisions.

Changes, amendments or revisions. The Shoreline Management Master Program process for changes, amendments or revisions shall be used within the Shoreline Management Area.

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CHAPTER 20.740
SEPA REGULATIONS

Sections:

20.740.010 Authority.

20.740.020 Contents.

20.740.100 General Requirements.

20.740.110 Purpose of this Part and Adoption by Reference.

20.740.120 Designation of Responsible Official.

20.740.130 Lead Agency Determination and Responsibilities.

20.740.140 Additional SEPA Timing Considerations.

20.740.200 Categorical Exemptions and Threshold Determinations

20.740.210 Purpose of this Section and Adoption by Reference.

20.740.220 Environmental Checklist.

20.740.230 Optional DNS Process.

20.740.240 Mitigated DNS.

20.740.250 Determination of Significance (DS)/Initiation of Scoping.

20.740.300 Environmental Impact Statements (EIS).

20.740.310 Purpose of this Part and Adoption by Reference.

20.740.320 Scoping.

20.740.330 Preparation of EIS – Additional Considerations.

20.740.400 Notification and Commenting.

20.740.410 Purpose of this Part and Adoption by Reference.

20.740.420 Filing of Environmental Documents.

20.740.430 Public Notice.

20.740.440 Comments and Responses.
20.740.450 Designation of Official to Perform Consulted Agency Responsibilities.
20.740.500 Use of Existing Environmental Documents.
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20.740.520 Methods for Utilizing Existing Document.
20.740.530 Planned Action Review.
20.740.600 SEPA and City Decisions.
20.740.610 Purpose of this Part and Adoption by Reference.
20.740.620 Substantive Authority.
20.740.630 SEPA Policies.
20.740.640 Appeals.
20.740.700 Definitions.
20.740.710 Purpose of this Part and Adoption by Reference.
20.740.720 Additional Definitions.
20.740.800 Categorical Exemptions.
20.740.810 Purpose of this Part and Adoption by Reference.
20.740.820 Use of Exemptions.
20.740.830 Exemption from Threshold Determinations.
20.740.840 Exempt Levels for Minor New Construction.
20.740.900 Agency Compliance.
20.740.950 Forms.

20.740.010 Authority.

The City adopts this ordinance under the authority and mandates of the State Environmental Policy Act (SEPA), 43.21C.120 RCW and 43.21C.135 RCW, and the SEPA rules, Chapter 197-11 WAC.

20.740.020 Contents.

Contents. The ordinance codified in this Chapter contains the City's SEPA procedures and policies. The SEPA rules, Chapter 197-11 WAC, are to be used in conjunction with this Chapter. As contemplated by such rules (WAC 197-11-904), the sections of the SEPA rules hereinafter set forth by number are adopted by reference as if fully set forth. Copies of the statute and the rules (WAC Chapter 197-11) shall be kept available for public inspection in the planning office at City Hall, and a section by section summary of the adopted rules shall be advertised, all as contemplated by 43.21C.135(2) RCW.

20.740.100
GENERAL REQUIREMENTS

Sections:

20.740.110 Purpose of this Part and Adoption by Reference.

20.740.120 Designation of Responsible Official.

20.740.130 Lead Agency Determination and Responsibilities.

20.740.140 Additional SEPA Timing Considerations.

20.740.110 Purpose of this Part and Adoption by Reference.

Adoption of SEPA provisions. This part contains the basic requirements that apply to the SEPA process. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-030	Policy
WAC 197-11-040	Definitions
WAC 197-11-050	Lead Agency
WAC 197-11-055	Timing of the SEPA Process
WAC 197-11-060	Content of Environmental Review
WAC 197-11-070	Limitations on Actions During SEPA Process
WAC 197-11-080	Incomplete or Unavailable Information
WAC 197-11-090	Supporting Documents
WAC 197-11-100	Information Required of Applicants

WAC 197-11-158	GMA Project Review-Reliance on Existing Plans, Laws and Regulations
WAC 197-11-210	SEPA/GMA Integration
WAC 197-11-220	SEPA/GMA Definitions
WAC 197-11-228	Overall SEPA/GMA Integration Procedures
WAC 197-11-230	Timing of an Integrated GMA/SEPA Process
WAC 197-11-232	SEPA/GMA Integration Procedures for Preliminary Planning, Environmental Analysis, and Expanded Scoping
WAC 197-11-235	Documents
WAC 197-11-238	Monitoring
WAC 197-11-250	SEPA/Model Toxics Control Act Integration
WAC 197-11-253	SEPA Lead Agency for MTCA Actions
WAC 197-11-256	Preliminary Evaluation
WAC 197-11-259	Determination of Nonsignificance for MTCA Remedial Action
WAC 197-11-262	Determination of Significance and EIS for MTCA Remedial Actions
WAC 197-11-265	Early Scoping for MTCA Remedial Actions
WAC 197-11-268	MTCA Interim Actions

20.740.120 Designation of Responsible Official.

A. *Responsible official.* For public proposals, the head administrative official of the lead City department or division making the proposal shall be the responsible official. Whenever possible, agency people carrying out SEPA procedures should be different from agency people making the proposal.

B. *Private proposals.* For private proposals, the head administrative official of the department or division with primary responsibility for approving or processing the permits and licenses for the proposal shall be the responsible official. When multiple officials have permitting authority, the assignment of responsibility shall be reached by agreement.

C. *When City is lead agency*. For all proposals for which the City is the lead agency, the responsible official shall make the threshold determination, supervise scoping and preparation of any required environmental impact statement (EIS), and perform any other functions assigned to the lead agency or responsible official by those sections of the SEPA rules that are adopted by reference in this Chapter, or otherwise assigned by the supplemental provisions of this Chapter.

D. *Retention of documents.* The City shall retain all documents required by the SEPA rules (Chapter 197-11 WAC) and make them available in accordance with Chapter 42.17 RCW.

20.740.130 Lead Agency Determination and Responsibilities.

A. *Determination of lead agency.* The department within the City receiving an application for or initiating a proposal that involves a nonexempt action shall determine the lead agency for that proposal under the applicable SEPA rules and supplemental provisions adopted in 20.740.900 VMC of this Chapter, unless the lead agency has been previously determined or the department is aware that another department or agency is in the process of determining the lead agency.

B. *When City is lead agency*. When the City is the lead agency for a proposal, the department receiving the application shall determine the responsible official who shall supervise compliance with the threshold determination requirements and supervise preparation of the EIS if an EIS is required.

C. *When City is not lead agency*. When the City is not the lead agency for a proposal, all departments of the City shall use and consider, as appropriate, either the Determination of Non-Significance (DNS) or final EIS of the lead agency in making decisions on the proposal. No City department shall prepare or require preparation of a DNS or EIS in addition to that prepared or required by the lead agency, unless required under 197-11-600 WAC. In some cases, the City may conduct supplemental environmental review under 197-11-600 WAC.

D. *Inappropriate designation.* If the City or any of its departments receives a lead agency determination made by another agency that appears to be inconsistent with the criteria of the SEPA rules and supplemental provisions adopted in 20.740.900 VMC of this Chapter, it may object to the determination and assume lead agency status or seek Ecology resolution of lead agency disputes, according to the SEPA rules and supplemental provisions adopted in 20.740.900 VMC of this Chapter.

E. *Inter-departmental agreement.* Departments of the City are authorized to make agreements as to lead agency status or shared lead agency duties for a proposal, in accordance with the provisions of the SEPA rules and supplemental provisions adopted in 20.740.900 VMC of this Chapter; provided, that the responsible official and any department that will incur responsibilities as the result of such agreement approve the agreement.

F. *Requirement of sufficient information.* Any department making a lead agency determination for a private project shall require sufficient information from the applicant to identify which other agencies have jurisdiction over the proposal, including agencies which require nonexempt licenses.

G. *MCTA remedial action.* When the City is lead agency for a MTCA remedial action, Ecology shall be provided an opportunity under 197-11-253(5) WAC to review the environmental documents prior to public notice being provided. If the SEPA and MTCA documents are issued together with one public comment period under 197-11-253(6) WAC, the City shall decide jointly with Ecology who receives the comment letters and how copies of the comment letters will be distributed to the other agency.

20.740.140 Additional SEPA Timing Considerations.

The following time limits, expressed in calendar days shall apply when the City processes licenses, approvals and project permits for all private projects and those governmental proposals submitted to the City by other agencies requesting the City to perform lead agency duties:

A. *Categorical exemptions.* The City shall identify whether an action will likely be categorically exempt under the SEPA rules and supplemental provisions adopted in 20.740.800 VMC of this Chapter no later than in its issuance of the preapplication conference summary under Section 20.210.080(H) VMC. If a preapplication conference is not required under Section 20.210.080 VMC, the City shall determine whether the project is categorically exempt within 28 days of receiving an application.

B. *Threshold determinations for project permit applications.*

1. No threshold determination shall be issued prior to the expiration of the comment period for any notice of application required by Chapter 20.210 VMC, Decision-Making Procedures, unless the responsible official uses the optional DNS provisions contained in 20.740.200 VMC of this Chapter.

2. A final determination shall be issued at least 15 days prior to any open record hearing or open record pre-decision hearing required pursuant to Chapter 20.210 VMC, Decision-Making Procedures.

3. If a determination of significance is made under this Chapter concurrently with any notice of application under Chapter 20.210 VMC, Decision-Making Procedures, the notice of application shall be combined with the determination of significance and scoping notice; provided, that nothing in this Section prevents a determination of significance and scoping notice from being issued prior to the notice of application.

4. Nothing in this Section prevents a lead agency, when it is a project proponent or is funding a project, from conducting its review under SEPA or from allowing appeals of procedural determinations prior to submitting a project permit application.
5. The optional DNS process provided in 20.740.200 VMC of this Chapter may be used to indicate on the notice of application that the lead agency is likely to issue a DNS. If this optional process is used, a separate comment period on the DNS may not be required.
6. If the City's only action on a proposal is a decision on a building permit or other license that requires detailed project plans and specifications, the applicant may request in writing that the City conduct environmental review prior to submission of the detailed plans and specifications and the responsible official may agree to such request; provided, that for project permit proposals, the earliest point at which environmental review may be initiated is upon filing of a fully-complete application, including an environmental checklist, as determined by Chapter 20.210 VMC, Decision-Making Procedures.
7. *Early notice.* An applicant may request in writing early notice of whether a determination of significance (DS) is likely under WAC 197-11-350. The request must:
    a. Follow submission of a permit application and environmental checklist for a nonexempt proposal for which the department is lead agency; and
    b. Precede the City's actual threshold determination for the proposal.
8. *City's response.* The responsible official shall respond in writing to the request in 7 working days. Such response will:
    a. State whether the City currently considers issuance of a DS likely and, if so, indicate the general or specific area(s) of concern that is/are leading the City to consider a DS; and
    b. State that the applicant may change or clarify the proposal to mitigate the indicated impacts, revising the environmental checklist and/or permit application as necessary to reflect the changes or clarifications.
9. *Status of written response.* The City's written response under Subsection (B) of this Section shall not be construed as a determination of significance. In addition, preliminary discussion of clarifications or changes to a proposal, as opposed to a written request for earl notice, shall not bind the City to consider the clarifications or changes in its threshold determination.

C. *Threshold determinations for nonproject permit proposals*.

1. For all proposals not classified as project permits, the City should complete threshold determinations which may be determined solely upon review of the environmental checklist within 14 days of determining that an adequate application and completed checklist have been submitted.

2. When the responsible official requires further information or studies from the applicant or consultation with other agencies with jurisdiction:
    a. The City should request such further information or studies within 14 days of determining that an adequate application and checklist have been submitted for nonproject permit proposals.
    b. The City shall wait no longer than 30 days for a consulted agency to respond.
    c. The responsible official should complete the threshold determination within 14 days of receiving the requested information or studies from the applicant or the consulted agency; provided, that in the case of information requested from a consulted agency that does not respond within 30 days, the responsible official should complete the threshold determination immediately unless further information was also requested from the applicant or another agency, provided further, that the provisions of Subsection 20.740.140(B) shall apply to project permit proposals.
3. Where the City must initiate further studies, including field investigations, to obtain the information to make the threshold determination, the City should complete the studies within 30 days of receiving a fully-complete application and checklist for project permit proposals, and within 30 days of receiving an adequate application and checklist for nonproject permit proposals.
4. For nonexempt proposals where action by an advisory or decision-making body such as the Planning Commission, Hearing Examiner, or City Council is required, the determination of nonsignificance (DNS) or final EIS for the proposal shall accompany the City's staff recommendation to the advisory or decision-making body.

20.740.200 ENVIRONMENTAL CHECKLIST AND THRESHOLD DETERMINATIONS

Sections:

20.740.210 Purpose of this Section and Adoption by Reference.

20.740.220 Environmental Checklist.

20.740.230 Optional DNS Process.

20.740.240 Mitigated DNS.

20.740.250 Determination of Significance (DS)/Initiation of Scoping.

20.740.210 Purpose of this Section and Adoption by Reference.

Adoption of SEPA provisions. This part contains the rules for deciding whether a proposal has a probable significant, adverse environmental impact requiring an environmental impact statement (EIS) to be prepared. This part also contains rules for evaluating the impacts of proposals not requiring an EIS. As supplemented by the provisions of this part, the City adopts the following Sections of the SEPA rules by reference:

WAC 197-11-300	Purpose of this Part, Relating to Categorical Exemptions and Threshold Determinations
WAC 197-11-305	Categorical Exemptions
WAC 197-11-310	Threshold Determination Required
WAC 197-11-315	Environmental Checklist
WAC 197-11-330	Threshold Determination Process
WAC 197-11-335	Additional Information

WAC 197-11-340 Determination of Nonsignificance (DNS)

WAC 197-11-350 Mitigated DNS

WAC 197-11-355 Optional DNS Process

WAC 197-11-360 Determination of Significance (DS)/Initiation of Scoping

WAC 197-11-390 Effect of threshold Determination

20.740.220 Environmental Checklist.

A. *When required.* Except as provided in Subsection (B) of this Section, a completed environmental checklist or a copy, in the form provided in 197-11-960 WAC, shall be filed at the same time as an application for a permit, license, certificate or other approval not specifically exempted in this Chapter.

B. *Exemptions.* An environmental checklist is not needed for the following proposals:

1. Proposals where the City and applicant agree an EIS is required.
2. Proposals where SEPA compliance has been previously completed.
3. Proposals where SEPA compliance has been initiated by another agency.
4. Public proposals on which the lead agency has decided to prepare its own EIS.

C. *Other provisions*.

1. The City shall use the environmental checklist to determine the lead agency and, if the City is the lead agency, to determine the responsible official for making the threshold determination.
2. For private proposals, the City will require the applicant to complete the environmental checklist, providing assistance as the City determines necessary.
3. For City proposals, the department initiating the proposal shall complete the environmental checklist for that proposal.
4. The City may require that it, and not the private applicant, will complete all or a part of the environmental checklist for a private proposal, if either of the following occurs:
    a. The City has technical information on a question or questions that is unavailable to the private applicant; or
    b. The applicant has provided inaccurate information on previous proposals or on proposals currently under consideration.

5. For projects submitted as planned actions under 197-11-164 WAC, the City shall use its existing environmental checklist form or may modify the environmental checklist form as provided in 197-11-315 WAC. The modified environmental checklist form may be prepared and adopted along with or as part of a planned action ordinance; or developed after the ordinance is adopted. In either case, a proposed modified environmental checklist form must be sent to Ecology to allow at least a 30 day review prior to use.

20.740.230 Optional DNS Process.

A. *General.* For any project permit proposal, where the responsible official determines upon a reasonable basis that significant, adverse environmental impacts are unlikely, the responsible official may use a single integrated comment period to obtain comments on the notice of application issued under Chapter 20.210 VMC, Decision-Making Procedures, and the likely threshold determination for the proposal. When this process is used, a separate comment period for the DNS will typically not be required when the initial Threshold Determination is issued.

B. *Optional DNS process.* Where the optional DNS process is used, the responsible official shall:

1. State on the first page of the notice of application that it expects to issue a DNS for the proposal and that:
    a. The optional DNS process will be used;
    b. That the comment period for the notice of application may be the only opportunity to comment on the environmental impacts of the proposal;
    c. That the proposal may include mitigation measures under applicable codes, and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared; and
    d. That a copy of the final threshold determination for the specific proposal may be obtained upon written request.
2. List in the notice of application the conditions being considered to mitigate environmental impacts, if a mitigated DNS is expected;
3. Comply with the requirements for a notice of application and public notice in 36.70B.110 RCW and Chapter 20.210 VMC, Decision-Making Procedures; and
4. Send the notice of application and environmental checklist to:
    a. Agencies with jurisdiction, Ecology, affected tribes, and each local agency or political subdivision whose public services would be changed as a result of implementation of the proposal; and
    b. Anyone who requests a copy in writing of the environmental checklist for the specific proposal.

C. *Additional provisions.* If the lead agency indicates on the notice of application that a DNS is likely, an agency with jurisdiction may assume lead agency status during the comment period on the notice of application;

D. *Consideration of comments.* The responsible official shall consider timely comments on the notice of application and either:

1. Issue a final DNS or Mitigated Determination of Non-Significance (MDNS) with no comment period using the procedures in Subsection (E) of this Section;

2. Issue a final DNS or MDNS with a comment period using the procedures in Subsection (E) of this Section, if the responsible official determines a comment period is necessary;

3. Issue a DS; or

4. Require additional information or studies prior to making a final threshold determination; and

E. *Copies of issued DNS or MDNS.* If a DNS or MDNS is issued under Subsection (D)(1) of this Section, the lead agency shall send a copy of the DNS or MDNS to agencies with jurisdiction, Ecology, those who commented, and anyone who requests a copy in writing. A copy of the environmental checklist need not be circulated.

20.740.240 Mitigated DNS.

As provided in this Section and in 197-11-350 WAC, the responsible official may issue a mitigated determination of nonsignificance (DNS) based on conditions attached to the proposal by the responsible official or based on changes to, or clarifications of, the proposal made by the applicant.

A. *Early notice.* An applicant may request in writing early notice of whether a determination of significance (DS) is likely under WAC 197-11-350. The request must:

1. Follow submission of a permit application and environmental checklist for a nonexempt proposal for which the department is lead agency; and

2. Precede the City's actual threshold determination for the proposal.

B. *City's response.* The responsible official shall respond in writing to the request within 7 working days. Such response will:

1. State whether the City currently considers issuance of a DS likely and, if so, indicate the general or specific area(s) of concern that is/are leading the City to consider a DS; and

C. *Identification of impacts.* As much as reasonably possible, the City should assist the applicant with identification of impacts to the extent necessary to formulate mitigation measures.

D. *Submission of changes or changed proposal.* When an applicant submits a changed or clarified proposal, along with a revised environmental checklist, the City shall base its threshold determination on the changed or clarified proposal and should make the determination within 14 days of receiving the changed or clarified proposal:

1. If the City indicated specific mitigation measures in its response to the request for early notice and that such measures would lead to a DNS, and if the applicant changed or clarified the proposal to include those specific mitigation measures, the City shall issue and circulate a DNS under 197-11-340 WAC.
2. If the City indicated areas of concern, but did not indicate specific mitigation measures that would allow it to issue a DNS, the City shall make the threshold determination, issuing a DNS or DS as appropriate.
3. The applicant's proposed mitigation measures e.g., clarification, changes or conditions, must be in writing and must be specific. For example, a proposal to "control noise" or "prevent stormwater runoff" would be inadequate, whereas a proposal to "muffle machinery to X decibel" or to "construct 200' stormwater retention pond at Y location" would be adequate.
4. Mitigation measures which justify issuance of a mitigated DNS may be incorporated in the DNS by reference to agency staff reports, studies or other documents.

E. *Issuance of mitigated DNS.* A mitigated DNS is issued under either 197-11-340(2) WAC, requiring a 14 day comment period and public notice, or 197-11-355 WAC, which may require no additional comment period beyond the comment period on the notice of application.

F. *Conditions of approval.* Mitigation measures incorporated in the mitigated DNS shall be deemed conditions of approval of the permit decision and may be enforced in the same manner as any term or condition of the permit, or enforced in any manner legally available to the City.

G. *Lack of mitigation measures.* If the City's tentative decision on a permit or approval does not include mitigation measures that were incorporated in a mitigated DNS for the proposal, the City should evaluate the threshold determination to assure consistency with 197-11-340(3) WAC governing withdrawal of DNS.

20.740.250 Determination of Significance (DS)/Initiation of Scoping.

Initiation of scoping. If a determination of significance is made under 197-11-360 WAC concurrently with any notice of application required pursuant to Chapter 20.210 VMC, Decision-Making Procedures, such notice of application shall be combined with the DS/scoping notice.

20.740.300
ENVIRONMENTAL IMPACT STATEMENTS (EIS)

Sections:

20.740.310 Purpose of this Part and Adoption by Reference.

20.740.320 Scoping.

20.740.330 Preparation of EIS – Additional Considerations.

20.740.310 Purpose of this Part and Adoption by Reference.

Adoption of SEPA provisions. This part contains the rules for preparing environmental impact statements. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-400	Purpose of EIS
WAC 197-11-402	General Requirements
WAC 197-11-405	EIS Types
WAC 197-11-406	EIS Timing
WAC 197-11-408	Scoping
WAC 197-11-410	Expanded Scoping
WAC 197-11-420	EIS Preparation
WAC 197-11-425	Style and Format
WAC 197-11-430	Format

WAC 197-11-435	Cover Letter or Memo
WAC 197-11-440	EIS Contents
WAC 197-11-442	Contents of EIS on Nonproject Proposals
WAC 197-11-443	EIS Contents When Prior Nonproject EIS
WAC 197-11-444	Elements of the Environment
WAC 197-11-448	Relationship of EIS to Other Considerations
WAC 197-11-450	Cost-Benefit Analysis
WAC 197-11-455	Issuance of DEIS
WAC 197-11-460	Issuance of FEIS

20.740.320 Scoping.

Scoping. Scoping under 197-11-408 WAC is required for the preparation of every new draft EIS (DEIS), but is optional at the direction of the responsible official for the preparation of a supplemental EIS (SEIS) or when adopting another environmental document as the EIS pursuant to Part Six of this Chapter.

A. *Comment period for DS/scoping notice.* If the responsible official issues the DS/scoping notice with a notice of application issued under the provisions of Chapter 20.210 VMC, Decision-Making Procedures, the comment period on the notice of application shall be no less than 14 days.

B. *Expansion of scoping process.* The responsible official may expand the scoping process to incorporate the provisions of 197-11-410 WAC, governing expanded scoping, where the responsible official determines that such expanded scoping is reasonably necessary to evaluate the potential adverse impacts and reasonable alternatives for a proposal.

20.740.330 Preparation of EIS – Additional Considerations.

Additional considerations. Preparation of draft and final Environmental Impact Statements (DEIS and FEIS) and draft and final supplemental Environmental Impact Statements (SEIS) shall be under the direction of the responsible official. Before the City issues an EIS, the responsible official shall be satisfied that it complies with this Chapter and the SEPA rules.

A. *Who prepares EIS.* The DEIS and FEIS or draft and final SEIS may be prepared by City staff, the applicant, or by a consultant selected by the City or the applicant. If the responsible official requires an EIS for a proposal and determines that someone other than the City will prepare the EIS, the responsible official shall notify the applicant immediately after completion of the threshold determination. The responsible official shall also notify the applicant of the City's procedure for EIS preparation, including approval of the DEIS and FEIS prior to distribution.

B. *Who provides additional information.* The City may require an applicant to provide information the City does not possess, including specific investigations. However, the applicant is not required to supply information that is not required under this Chapter or that is being requested from another agency; provided, that this does not apply to information the City may request under another ordinance or statute.

20.740.400
NOTIFICATION AND COMMENTING

Sections:

20.740.410 Purpose of this Part and Adoption by Reference.

20.740.420 Filing of Environmental Documents.

20.740.430 Public Notice.

20.740.440 Comments and Responses.

20.740.450 Designation of Official to Perform Consulted Agency Responsibilities.

20.740.410 Purpose of this Part and Adoption by Reference.

Adoption of SEPA regulations. This part contains the rules for consulting, commenting, and responding on all environmental documents under SEPA, including rules for public notice and hearings. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-500	Purpose of this Part, Relating to Commenting
WAC 197-11-502	Inviting Comment
WAC 197-11-504	Availability and Cost of Environmental Documents
WAC 197-11-508	SEPA Register
WAC 197-11-510	Public Notice
WAC 197-11-535	Public Hearings and Meetings
WAC 197-11-545	Effect of No Comment
WAC 197-11-550	Specificity of Comments

WAC 197-11-560 FEIS Response to Comments

WAC 197-11-570 Consulted Agency Costs to Assist Lead Agency

20.740.420 Filing of Environmental Documents.

A. *Submission of documents.* The City shall submit the following documents in a timely manner to Ecology for publication in the SEPA register:

1. DNSs issued under the provisions of 197-11-340 WAC;
2. DNSs issued under the optional provisions of 197-11-355 WAC and Section 20.740.320 VMC;
3. All mitigated DNSs issued under the provisions of 197-11-350 WAC Section 20.740.330 VMC;
4. All determinations of significance (DS/scoping notices) issued under the provisions of 197-11-360 WAC;
5. All EISs, including DEIS, FEIS, and SEIS documents, and notices of adoption of EISs; and
6. All Notices of Action published under the provisions of 43.21C.080 RCW and 43.21C.087 RCW.

B. *Other SEPA documents.* SEPA documents not listed in Subsection (A) of this Section involve no statutory comment or response period, and are limited to certain EIS addenda (197-11-625 WAC) and DNS documents on proposals for which the City is the only agency with jurisdiction. These documents may, but are not required to, be circulated for agency and public review or comment.

20.740.430 Public Notice.

A. *When notice is required.* When the SEPA rules require notice to be given under 197-11-510 WAC, the City shall provide notice under this Section. The City shall use reasonable methods to inform the public and other agencies that an environmental document is being prepared or is available and that public hearings, if any, will be held.

B. *Notice of action.* A notice of action may be publicized in the manner prescribed by 43.21C.080 RCW and 43.21C.087 RCW. The form of notice shall be substantially in the form provided in 197-11-990 WAC. The notice shall be published by the City Clerk, applicant or proponent pursuant to Section 43.21C.080 RCW.

C. *Integration of notification.* Whenever possible, the City shall integrate the public notice required under this Section with existing notice procedures for the City's nonexempt permit(s) or approval(s) required for the proposal. Whenever the City issues a DNS under 197-11-340(2) WAC or a DS under 197-11-360(3) WAC the City shall give public notice as follows:

1. If public notice is required for a nonexempt license, the notice shall state whether a DS or DNS has been issued and when comments are due.
2. If an environmental document is issued concurrently with the notice of application, the public notice requirements for the notice of application in 36.70B.110(4) RCW will suffice to meet the SEPA public notice requirements in 197-11-510(1) WAC.
3. If no public notice is otherwise required for the permit or approval, the City shall give notice of the DNS or DS by at least one of the following methods:
    a. Posting the property, for site-specific proposals;
    b. Publishing notice in a newspaper of general circulation in the City or general area where the proposal is located;
    c. Notifying public or private groups which have expressed interest in a certain proposal or in the type of proposal being considered;
    d. Notifying the news media;
    e. Placing notices in appropriate regional, neighborhood, ethnic or trade journals; and/or
    f. Publishing notice in City newsletters and/or sending notice via City or neighborhood association mailing lists.
4. Whenever the City issues a DS under 197-11-360(3) WAC, the City shall state the scoping procedure for the proposal in the DS as required in 197-11-408 WAC and in the public notice.

D. *Public notice requirements for optional DNS process.* If a DNS is issued using the optional DNS process, the public notice requirements for a notice of application in 36.70B.110(4) RCW as supplemented by the requirements in 197-11-355 WAC will suffice to meet the SEPA public notice requirements in 197-11-510(1)(b) WAC.

E. *Notice of availability of documents.* Whenever the City issues a DEIS under 197-11-455(5) WAC or a SEIS under 197-11-620 WAC, notice of the availability of those documents shall be given by:

1. Indicating the availability of the DEIS in any public notice required for a nonexempt licenses and at least one of the following methods:
    a. Posting the property, for site-specific proposals;
    b. Publishing notice in a newspaper of general circulation in the City or general area where the proposal is located;
    c. Notifying public or private groups which have expressed interest in a certain proposal or in the type of proposal being considered;
    d. Notifying the news media;

e. Placing notices in appropriate regional, neighborhood, ethnic, or trade journals; and/or

f. Publishing notice in City newsletters and/or sending notice via City or neighborhood association mailing lists.

F. *Public notice for planned actions.* Public notice for projects that qualify as planned actions shall be tied to the underlying permit as specified in 197-11-172(3) WAC.

G. *Responsible party.* The City may require an applicant to complete the public notice requirements for the applicant's proposal at his or her expense.

20.740.440 Comments and Responses.

A. *Invitation of comments.* The City shall invite comment under 197-11-502 WAC as supplemented in this Section.

B. *Definition of reasonable methods.* The City shall use reasonable methods to inform agencies and the public of environmental determinations, document availability, and review or comment opportunities. In particular, the City shall invite written comments on the environmental aspects of any nonexempt proposal to be submitted in the manner and within the prescribed time limits set forth in this Section.

C. *Timelines of response.* Consulted agencies have a responsibility to respond in a timely and specific manner to requests for comments. If a consulted agency does not respond with written comments within the time periods for commenting on environmental documents, the City may assume that the consulted agency has no information relating to the potential impact of the proposal as it relates to the consulted agency's jurisdiction or special expertise. Any consulted agency that fails to submit substantive information to the City in response to a draft EIS is thereafter barred from alleging any defects in the City's compliance with Section 20.740.300 VMC of this Chapter, or the SEPA rules.

D. *Failure to comment.* Failure to comment by agencies with jurisdiction or members of the public on environmental documents, within the time periods specified by this part, shall be construed as lack of objection to the environmental analysis, if the requirements of Section 20.740.520 VMC are met.

E. *Specificity of comments.* Written comments on environmental documents submitted by any person or agency should be as specific as possible and shall meet the requirements of 197-11-550 WAC. The City shall consider and may respond to comments as deemed appropriate, and may decline to consider comments which do not meet the requirements of this Section.

F. *Threshold determinations.*

1. The City shall send DNSs to other agencies with jurisdiction, as required by 197-11-340 WAC and Section 20.740.320 VMC.

2. For DNSs issued under 197-11-340(2) WAC, the City shall provide public notice under Section 20.740.520 VMC and receive comments on the DNS for 14 days.

3. Comments on a DNS may be used in re-evaluating the threshold determination and in considering mitigation measures, but will normally involve no written response.

G. *Scoping*.

1. The City shall circulate the DS and invite comments on the scope of an EIS, as required by 197-11-360 WAC, 197-11-408 WAC, Section 20.740.410 VMC and Section 20.740.520 VMC.
2. The City may use other reasonable methods to inform agencies and the public, such as those indicated in 197-11-410 WAC.
3. The City determines the method for commenting, as governed by 197-11-408 and 197-11-410 WAC.
4. Comments on a DS will be used in determining the scope of an EIS.

H. *DEIS*.

1. The City shall invite comments on and circulate DEISs as required by 197-11-455 WAC.
2. The commenting period shall be 30 days unless extended by the City under 197-11-455 WAC.
3. Agencies shall comment and respond as stated in this part. This part meets the Act's formal consultation and comment requirement in 43.21C.030(2)(d) RCW.
4. Comments on a draft EIS will be evaluated for response in the FEIS by one or more of the following means:
    a. Modify alternatives including the proposed action;
    b. Develop and evaluate alternatives not previously given detailed consideration;
    c. Supplement, improve or modify the analysis;
    d. Make factual corrections; or
    e. Explain why the comments do not warrant further City response, citing the sources, authorities or reasons that support the City's response and, if appropriate, indicate those circumstances that would trigger further agency reappraisal or further response.
5. In carrying out Subsection (4), the City may respond to each comment individually, respond to a group of comments, cross-reference comments and corresponding changes in the EIS, or use other reasonable means to indicate an appropriate response to comments.

I. *FEIS.*

1. The City shall prepare a FEIS whenever a DEIS has been prepared, unless the proposal is withdrawn or indefinitely postponed.
2. An FEIS shall be issued and circulated under the provisions of 197-11-460 WAC.

3. All substantive comments on a DEIS shall be appended to the FEIS, or summarized, where comments are repetitive or voluminous, and the summary appended. If a summary of the comments is used, the names of the commenters shall be included.

4. If the City does not receive any comments critical of the scope or content of the DEIS, the City may state so in an updated fact sheet, 197-11-440(2) WAC, which shall be circulated under 197-11-460 WAC. The FEIS shall consist of the DEIS and updated fact sheet.

5. If changes in response to comments are minor and are largely confined to the responses described in Subsections (G)(4)(d) and (G)(4)(e) of this Section, the City may prepare and attach an addendum, which shall consist of the comments, the responses, the changes, and an updated fact sheet. The FEIS shall consist of the DEIS and the Addendum, and shall be issued under WAC 197-11-460, except that only the addendum need be sent to parties who received the DEIS.

J. *Public hearings and meetings*.

1. Public hearings or meetings may be held 197-11-535 WAC. Notice of public hearings shall be given under Section 20.740.520 VMC and may be combined with other agency notice.

2. In conjunction with the requirements of Section 20.740.520 VMC, notice of public hearings shall be published no later than 10 days before the hearing. For nonproject proposals, notice of the public hearing shall be published in a newspaper of general circulation in the City. For nonproject proposals having a regional or state-wide applicability, copies of the notice shall be given to the Olympia bureau of the Associated Press and United Press International.

K. *Supplements*.

1. Notice for and circulation of draft and final SEISs shall be done in the same manner as other draft and final EISs.

2. When a DNS is issued after a DS has been withdrawn, governed by 197-11-360 WAC, the City shall give notice under Section 20.740.520 VMC and receive comments for 14 days.

3. An addendum need not be circulated unless required under 197-11-625 WAC.

L. *Appeals.* Notice provisions for appeals are contained in part seven of this Chapter.

M. *Circulation of additional documents.* The City may circulate any other environmental documents for the purpose of providing information or seeking comment, as an agency deems appropriate.

N. *Use of other reasonable methods.* In addition to any required notice or circulation, the City may use other reasonable methods, to inform agencies and the public that environmental documents are available or that hearings will occur.

O. *Combining notices.* The City may combine SEPA notices with other agency notices. However, the SEPA information must be identifiable.

20.740.450 Designation of Official to Perform Consulted Agency Responsibilities.

A. *Designation of official.* The Planning Official shall be responsible for preparation of written comments for the City in response to a consultation request prior to a threshold determination, participation in scoping, and reviewing a DEIS.

B. *Responsibilities.* This Planning Official shall be responsible for the City's compliance with 197-11-550 WAC whenever the City is a consulted agency and is authorized to develop operating procedures that will ensure that responses to consultation requests are prepared in a timely fashion and include data from all appropriate departments of the City.

20.740.500
USE OF EXISTING ENVIRONMENTAL DOCUMENTS

Sections:

20.740.510 Purpose of this Part and Adoption by Reference.

20.740.520 Methods for Utilizing Existing Document.

20.740.530 Planned Action Review.

20.740.510 Purpose of this Part and Adoption by Reference.

Adoption of SEPA regulations. This part contains the rules for using and supplementing existing environmental documents prepared under SEPA or the National Environmental Policy Act (NEPA) for the City's own environmental compliance. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-164	Planned Actions-Definition and Criteria
WAC 197-11-168	Ordinances or Resolutions Designating Planned Actions-Procedures for Adoption
WAC 197-11-172	Planned Actions-Project review
WAC 197-11-600	When to Use Existing Environmental Documents
WAC 197-11-610	Use of NEPA Documents
WAC 197-11-620	Supplemental Environmental Impact Statement-Procedures
WAC 197-11-625	Addenda-Procedures
WAC 197-11-630	Adoption-Procedures
WAC 197-11-635	Incorporation by Reference-Procedures

WAC 197-11-640 Combining Documents

20.740.520 Methods for Utilizing Existing Document.

Use of existing documentation. Whenever possible, the City shall reduce paperwork and the accumulation of background data by using existing environmental documents under WAC 197-11-600.

20.740.530 Planned Action Review.

A. *Pre-application review.* Pre-application review under the provisions of Section 20.210.080 VMC shall be required for all development applications which may qualify as planned action projects, unless waived, in writing, pursuant to Section 20.210.080(B) VMC.

B. *Submitted requirements.* Development applications which may qualify as planned action development applications shall be subject to the submittal requirements for counter-complete status, as governed by Section 20.210.090 VMC. A SEPA checklist or other project review form as specified in Section 197-11-315 WAC and Section 20.740.310(7) VMC is required.

C. *Review for fully-complete status.* Development applications which may qualify as planned action development applications shall be subject to review for fully-complete status under Section 20.210.100 VMC. In addition to the usual submittal requirements, such an application shall not be deemed fully complete until all information necessary to evaluate the proposal's qualification as a planned action project and its compliance with the mitigation requirements contained in the planned action ordinance, have been provided.

D. *Written documentation required.* Within 14 calendar days after the determination that a development application which may qualify as a planned action project is fully complete, the Planning Official shall make a written determination of whether the proposed project qualifies for designation as a planned action project, according to the criteria listed below. Any Notice of Application issued under Chapter 20.210 VMC, Decision-Making Procedures, shall contain the written determination of whether the proposed project qualifies as a planned action. The Planning Official's determination under this Subsection shall be appealable only in conjunction with an appeal of the approval, conditional approval, or denial of the project, in accordance with Subsection (I) of this Section, or the provisions of Section 20.210.130 VMC, whichever is applicable.

1. The proposed project is located within the geographic area of an identified planned action subarea and the proposed project's impacts are within the thresholds identified within the applicable planned action ordinance, subarea plan and EIS;

2. The zoning designation upon the property upon which the project is proposed is consistent with those designations analyzed in the subarea plan and EIS adopted for the planned action subarea;

3. The use(s) and intensity of use(s) proposed are among or consistent with the uses and intensity of uses identified in the planned action ordinance, subarea plan and EIS, adopted for the planned action subarea;
4. The proposed project's environmental impacts, both project specific and cumulative, have been adequately addressed and analyzed in the subarea plan and EIS for the planned action subarea;
5. The proposed project implements the goals and policies of the applicable subarea plan and is consistent with the City's Comprehensive Plan;
6. The proposed project's significant environmental impacts will be adequately mitigated or avoided through application of the mitigation measures and other conditions required by the planned action ordinance, subarea plan or EIS for the planned action subarea;
7. The proposed project is in compliance with all applicable local, state, and federal regulations and development standards;
8. The proposed project is within the Vancouver Urban Growth Boundary;
9. The proposed project meets the requirements for designation as a planned action set forth in Section 43.21C.031 RCW, Section 197-11-164 WAC, and Section 20.740.630 VMC; and
10. The proposed project meets any other criteria for designation as a planned action project set forth in the applicable planned action ordinance.

E. *Threshold determination for planned actions.* No threshold determination shall be required to be issued for planned action projects; provided, that a planned action project may be conditioned to mitigate any adverse environmental impacts which are reasonably likely to result from the project action.

F. When a project is not a planned action. Where the Planning Official determines that a project application does not qualify as a planned action development application under the provisions of Subsection (E), a threshold determination is required. The application shall be reviewed, processed, and subject to appeal under the decision-making procedures otherwise applicable under Chapter 20.210 VMC, Decision-Making Procedures, and the project application shall be reviewed under the City's SEPA regulations, as governed by this Chapter. When reviewed under this Chapter, the applicant may use or incorporate relevant elements of the environmental analysis in the EIS or subarea plan adopted for the planned action subarea.

G. *Context of Final Decisions and Notice of Decision.* Any Final Decision and Notice of Decision issued under Chapter 20.210 VMC, Decision-Making Procedures, shall contain:

1. A statement of the findings supporting the conclusions that the project meets the criteria for designation as a planned action, that the project will implement relevant goals and policies of the subarea plan, and that the project is consistent with the Comprehensive Plan;

2. A statement of the requirements, standards, and mitigation measures conditioned or required pursuant to the applicable planned action ordinance, subarea plan, EIS, Vancouver Municipal Code and other applicable laws and regulations;
3. A statement that the probable adverse environmental impacts of the project have been adequately addressed and mitigated by application of the mitigation measures required by the applicable planned action ordinance, subarea plan, EIS, the Vancouver Municipal Code, and other applicable laws and regulations.

H. *Procedures for approval and appeal.* The procedures for approval and appeal set forth in this Section shall be applied to all applications and approvals which are designated as planned action projects pursuant to subsection (E); provided, that the procedures set forth in this Section for approval and appeal of planned action projects may be supplemented or modified by procedures set forth in the applicable planned action ordinance.

I. *Appeal of Final Decision.* The Final Decision on a planned action development application shall be subject to appeal pursuant to Section 20.210.130 VMC; provided, that the environmental analysis and mitigation measures or other conditions contained in the planned action ordinance, subarea plan, or EIS shall be afforded substantial weight by the review authority on appeal.

20.740.600
SEPA AND CITY DECISIONS

Sections:

20.740.610 Purpose of this Part and Adoption by Reference.

20.740.620 Substantive Authority.

20.740.630 SEPA Policies.

20.740.640 Appeals.

20.740.610 Purpose of this Part and Adoption by Reference.

Adoption of SEPA regulations. This part contains the rules and policies for exercising SEPA's substantive authority, such as decisions to mitigate or reject proposals as a result of SEPA. This part also contains procedures for appealing SEPA determinations to agencies or the courts. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-650	Purpose of this Part
WAC 197-11-655	Implementation
WAC 197-11-660	Substantive Authority and Mitigation
WAC 197-11-680	Appeals

20.740.620 Substantive Authority.

A. *Supplementary to City authorization.* The policies and goals set forth in this Chapter are supplementary to those in the existing authorization of the City of Vancouver.

B. *Conditions of approval.* Subject to RCW 43.21C.060 and 43.21C.240, the city may attach conditions to a permit or approval for a proposal so long as:

1. Such conditions are necessary to mitigate specific probable adverse environmental impacts identified in environmental documents prepared pursuant to this title; and

2. Such conditions are in writing; and

3. The mitigation measures included in such conditions are reasonable and capable of being accomplished; and
4. The city has considered whether other local, state or federal mitigation measures applied to the proposal are sufficient to mitigate the identified impacts; and
5. Such conditions are based on one or more policies in VMC 20.740.630 and cited in the decision document.

C. *When additional mitigation is not required*. If during project review the City determines that the requirements for environmental analysis, protection and mitigation in the City's development regulations or Comprehensive Plan, or in other applicable local, state or federal laws or rules provide adequate analysis of and mitigation for the specific adverse environmental impacts under 43.21C.240 RCW, the City shall not impose additional mitigation under this Chapter.

D. *Content of findings.* Subject to 43.21C.060 RCW and 43.12C.240 RCW, the City may deny a permit or approval for a proposal on the basis of SEPA so long as findings are made that:

1. Approving the proposal would result in probable significant, adverse environmental impacts that are identified in a FEIS or final SEIS prepared pursuant to this Chapter; and
2. There are no reasonable mitigation measures capable of being accomplished that are sufficient to mitigate the identified impact; and
3. The denial is based on one or more policies identified in Section 20.740.630 VMC and identified in writing in the decision document.

20.740.630 SEPA Policies.

The City designates the following general policies as the basis for the City's exercise of authority pursuant to this Chapter. The City shall use all practicable means, consistent with other essential considerations of State policy, to improve and coordinate plans, functions, programs and resources to the end that the State and its citizens may:

A. *Environmental stewardship.* Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

B. *Protect Washington's interests.* Assure for all people of Washington safe, healthful, productive and aesthetically and culturally pleasing surroundings;

C. *Widest range of beneficial uses.* Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;

D. *Preservation of national and local heritage.* Preserve important historic, cultural and natural aspects of our national and local heritage;

E. *Supportive of diversity and choice.* Maintain, wherever possible, an environment which supports diversity and a variety of individual choice;

F. *Balance.* Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and

G. *Enhancement of renewable resources.* Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

1. The City recognizes that each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment.

2. The city incorporates by reference the policies in the cited city codes, ordinances, resolutions and plans, and all amendments to them in effect prior to the date of fully complete application of any building permit or preliminary plat, or prior to issuance of a DNS or DEIS for any other action:

   a. 20.110 VMC, Intent and Purpose;

   b. 20.120 VMC, Legal Provisions;

   c. 20.130 VMC, Zoning Map Administration;

   d. 20.140 VMC, Enforcement;

   e. 20.150 VMC, Definitions;

   f. 20.160 VMC, Use Classifications;

   g. 20.170 VMC, Measurements;

   h. 20.180 VMC, Density Requirements;

   i. 20.190 VMC, Fees;

   j. 20.195 VMC, Nonconforming Situations;

   k. 20.210 VMC, Decision Making Procedures;

   l. 20.215 VMC, Review Bodies;

   m. 20.220 VMC, Summary of Land Use Permits

   n. 20.245 VMC, Conditional Use Permits;

   o. 20.250 VMC, Development Agreements;

   p. 20.255 VMC, Interpretations and Minor Adjustments;

   q. 20.260 VMC, Master Plans;

   r. 20.265 VMC, Design Review;

s. 20.270 VMC, Public Facility Master Plans;

t. 20.280 VMC, Site Plan Review;

u. 20.285 VMC, Text and Map Amendments;

v. 20.290 VMC, Variances;

w. 20.310 VMC, Boundary Adjustments;

x. 20.320 VMC, Subdivisions;

y. 20.330 VMC, Binding Site Plans;

z. 20.410 VMC, Zoning Districts;

aa. 20.420 VMC, Building Types;

bb. 20.430 VMC, Use Requirements;

cc. 20.440 VMC, Frontage Requirements;

dd. 20.450 VMC, Additional Development Standards;

ee. 20.510 VMC, Active Ground Floor Use – Required

ff. 20.520 VMC, Active Ground Floor Use – Ready

gg. 20.530 VMC, Station Areas

hh. 20.540 VMC, Industrial Holding

ii. 20.550 VMC, Heritage Overlay District;

jj. 20.560 VMC, Noise Impact Overlay District;

kk. 20.570 VMC, Airport Height Overlay District;

ll. 20.610 VMC, 112th Avenue Subarea Plan;

mm. 20.620 VMC, Central Park Subarea Plan;

nn. 20.630 VMC, Evergreen and Grand Commercial Corridors Plan;

oo. 20.640 VMC, Fourth Plain Subarea Plan;

pp. 20.650 VMC, Fruit Valley Subarea Plan;

qq. 20.660 VMC, Riverview Gateway Subarea Plan;

rr. 20.670 VMC, Section 30 Subarea Plan;

ss. 20.680 VMC, Evergreen and Grand Commercial Corridors Plan;

tt. 20.690 VMC, City Center Subarea Plan;

uu. 20.710 VMC, Archaeological Resource Protection;

vv. 20.720 VMC, Critical Areas Protection;

ww. 20.730 VMC, Shoreline Management Area

xx. 20.740 VMC, SEPA Regulations;

H. *Endangered Species Act.* The City incorporates by reference the evaluation criteria for protecting, during development, threatened and endangered salmon species listed under the federal Endangered Species Act as presented in the Federal Register, Vol 65, No. 132, Monday, July 10, 2000, Rules and Regulations and in "A Citizen's Guide to the 4(d) Rule for Threatened Salmon and Steelhead on the West Coast," National Marine Fisheries Service, June 20, 2000. As applied in the City of Vancouver, it is the City's policy that development within the City limits shall to the degree necessary to protect threatened and endangered species:

1. Meet demands on water supply without affecting, either directly or through groundwater withdrawals, the flows salmon need.
2. Avoid inappropriate areas such as unstable slopes, wetlands, areas of high habitat value, and similarly constrained sites.
3. Avoid stream crossings, whether by roads, utilities, or other linear development, wherever possible and where crossings must be provided, minimize impacts.
4. Protect wetlands, wetland buffers and wetland function, including isolated wetlands.
5. Prevent erosion and sediment run-off during and after construction, thus preventing sediment and pollutant discharge to streams, wetlands and other water bodies that support listed fish.
6. Adequately prevent stormwater discharge impacts on water quality and quantity and stream flow patterns in the watershed – including peak and base flows in perennial streams.
7. Adequately preserve permanent and intermittent streams' ability to pass peak flows.
8. Stress landscaping with native vegetation to reduce the need to water and apply herbicides, pesticides and fertilizer.
9. Adequately protect historic stream meander patterns and channel migration zones and avoid hardening stream banks and shorelines.
10. Protect riparian areas to attain or maintain properly functioning conditions for salmonid habitat around all rivers, estuaries, streams, lakes, deepwater habitats, and intermittent streams.
11. Where application of these policies creates a conflict with existing development regulations, the level of protection necessary to protect threatened salmon species shall apply.

I. *Through the project review process.*

1. If the applicable regulations require studies that adequately analyze all of the project's specific probable adverse environmental impacts, additional studies under this Chapter will not be necessary on those impacts;
2. If the applicable regulations require measures that adequately address such environmental impacts, additional measures would likewise not be required under this Chapter; and
3. If the applicable regulations do not adequately analyze or address a proposal's probable adverse environmental impacts, this Chapter provides the authority and procedures for additional review.

20.740.640 Appeals.

A. *Governing regulations.* It is the purpose of this Chapter to combine environmental considerations with public decisions, and for this reason, any appeal brought under this Chapter shall be linked to a specific governmental action. Appeals under this Chapter are not intended to create a cause of action unrelated to a specific governmental action.

B. *Formal elimination of appellate procedures.* The appellate procedures provided for by 43.21C.060 RCW, which provides for an appeal to a local legislative body of any decision by a nonelected official conditioning or denying a proposal under authority of SEPA, are formally eliminated. The administrative appeal procedures provided by this part shall be construed consistently with 43.21C.075 RCW, Chapter 36.70B RCW, and 197-11-680 WAC.

C. *Relevant determinations.* Appeals under the provisions of this part shall be limited solely to those actions and/or determinations listed below. No administrative appeals shall be allowed for other actions and/or determinations taken or made pursuant to this Chapter (such as lead agency determination, a determination that a proposal is categorically exempt, scoping, draft EIS adequacy, etc.).

1. Procedural Appeals which shall consist of an appeal of the responsible official's compliance with the provisions of SEPA, the SEPA rules, and this Chapter with respect to the following:
   a. Determination of nonsignificance;
   b. Determination of significance;
   c. Adoption or issuance of a Final Environmental Impact Statement.
2. Substantive Appeals which shall consist of an appeal of any nonelected official's or tribunal's action or omission with respect to the conditioning or denying of a proposal under the substantive authority set forth in Section 20.740.710 VMC.

D. *Consolidation of appeals.* Except as provided in Subsection (E) of this Section, an appeal under this Section shall consolidate any available SEPA appeal with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body. The hearing or appeal shall be one at which the hearing officer or body will consider either the agency's decision or a recommendation on the proposed underlying governmental action. If no hearing or appeal on the underlying governmental action is otherwise provided, then no SEPA appeal is allowed under this Section, except as allowed under Subsection (E) of this Section.

E. *When consolidation is not required*. The following appeals of SEPA procedural or substantive determinations need not be consolidated with a hearing or appeal on the underlying governmental action:

1. An appeal of a determination of significance;
2. An appeal of a procedural determination made by an agency when the agency is a project proponent, or is funding a project, and chooses to conduct its review under this Chapter, including any appeals of its procedural determinations, prior to submitting an application for a project permit;
3. An appeal of a procedural determination made by an agency on a nonproject action.

F. *Filing requirements.* All procedural and substantive SEPA appeals provided under this Section shall be initiated by filing a written notice of SEPA administrative appeal with the Planning Official, accompanied with the applicable appeal fee; provided, that no additional appellate fee shall be charged in conjunction with an available hearing on the underlying permit or approval.

1. The notice of appeal required by this Section shall include, at a minimum:
    a. The name and address of the party or agency filing the appeal;
    b. An identification of the specific proposal and specific SEPA actions, omissions, conditions or determinations for which appeal is sought;
    c. A statement of the particular grounds or reasons for the appeal.
2. The Planning Official shall arrange to conduct the SEPA appeal in conjunction with a hearing or appeal on the underlying permit or approval, where required to consolidate the SEPA appeal with a hearing on the underlying governmental action. Where consolidation is not required, the Planning Official shall schedule the hearing to be conducted within 90 days of the date of filing the notice of appeal.
    a. SEPA procedural appeals shall be initiated and conducted in the manner set forth below:
        i. An appeal to the issuance of a DNS), MDNS or FEIS may be filed by any agency or aggrieved person as follows:

(A). For proposals which may be approved by an administrative official without public hearing, an appeal shall be filed within 14 days after notice that the determination has been made has been issued. Such SEPA appeal shall be heard in conjunction with the appeal of the underlying permit or approval, where such appeal is allowed; provided, that if no administrative appeal of the underlying permit or approval is otherwise provided for, and consolidation is not required by Subsection (D) above, an appeal of the DNS/FEIS shall be heard and decided in an open record hearing by the Hearing Examiner appointed in Chapter 20.290 VMC, Review Bodies. The decision of the Hearing Examiner on the SEPA procedural appeal shall be final and not subject to further administrative appeal.

(B). For proposals which may only be approved by open-record hearing or open-record pre-decision hearing recommendation before the Hearing Examiner or Planning Commission, an appeal shall be filed within 14 calendar days following the last day of any comment period required to be provided by this Chapter, or where no comment period is required, then within fourteen (14) days following the date of issuance or adoption of the DNS/FEIS, and shall be heard and decided in the open-record hearing by the Hearing Examiner or Planning Commission in conjunction with the decision or recommendation on the underlying proposal. The decision of the hearing examiner or planning commission on the SEPA procedural appeal shall be final and not subject to further administrative appeal.

(C). An appeal to a DS may be filed by the proposal applicant or sponsor within 14 days of the issuance of the DS/scoping notice. The appeal shall be heard in an open-record hearing and decided by a Hearing Examiner appointed pursuant to Chapter 20.290 VMC, Review Bodies, whose decision shall be final and not subject to further administrative appeal.

(D). The SEPA procedural determination of the responsible official shall be entitled to substantial weight, and the appellant shall bear the burden to establish a violation of SEPA, the SEPA rules, or the provisions of this Chapter.

(E). A SEPA procedural determination shall be deemed to be conclusively in compliance with SEPA, the SEPA rules, and the provisions of this Chapter, unless a SEPA procedural appeal is filed in accordance with this part.

(F). Where the Hearing Examiner or Planning Commission determines that the procedural determination is in violation of SEPA, the SEPA rules, or the provisions of this Chapter, the Hearing Examiner or Planning Commission may remand the procedural SEPA determination to the responsible official and, in such event, shall continue the open record hearing or open record pre-decision hearing until such time as a new or modified SEPA procedural determination is issued under the provisions of this Chapter. The decision of the Hearing Examiner or Planning Commission to remand the SEPA procedural determination shall be a final administrative decision not subject to further administrative appeal. Where applicable, such remand shall toll any period for project permit approval required by Chapter 36.70B RCW or other statutes, or otherwise required by other provisions of this code.

b. SEPA substantive appeals shall be initiated and conducted in the manner set forth below:

i. For proposals subject to final administrative action, approval, or recommendation by a nonelected administrative official or tribunal for which no administrative appeal is otherwise provided, and for which consolidation is not required by Subsection (D) of this Section, any agency or aggrieved person may file a substantive SEPA appeal within 14 days of the issuance of the administrative decision approving, conditioning, or denying the proposal on the basis of substantive SEPA authority. Such substantive SEPA appeal shall be heard and decided by the Hearing Examiner appointed in Chapter 2.51 RCW in an open record hearing, unless the proposal is a project permit which has been subject to a previous open record hearing, in which case the SEPA appeal hearing shall be a closed-record hearing. The substantive SEPA appeal shall be heard in conjunction with any procedural SEPA appeal. The decision of the Hearing Examiner on the SEPA substantive appeal shall be final and not be subject to further administrative appeal.

ii. For all proposals subject to final administrative action, approval or recommendation, by a nonelected administrative official or tribunal, for which an administrative appeal or further approval hearing is otherwise provided or required, any agency or aggrieved person may file a substantive SEPA appeal within 14 days of the issuance of the administrative decision approving, conditioning or denying the proposal on the basis of substantive SEPA authority; provided, that if the proposal is a project permit, as defined in Part 20.740.700 VMC of this Chapter, a substantive SEPA appeal shall be filed within 14 days after issuance of any notice of decision under Chapter 20.210 VMC, Decision-Making Procedures. Any substantive SEPA appeal shall be conducted in the same manner and with the same process as otherwise provided for the appeal or approval hearing of the underlying administrative action.

iii. The SEPA substantive determination to condition or deny a proposal shall be deemed to be conclusively in compliance with SEPA, the SEPA rules, and the provisions of this Chapter, unless a SEPA substantive appeal is filed in accordance with this Part.

c. any appeal under this Subsection, the City shall provide for a record that shall consist of the following:

i. Findings and conclusions;

ii. Testimony under oath; and

iii. A taped or written transcript.

G. *Judicial appeal.*

1. Any available administrative appeal provided under this Section must be utilized by an agency or aggrieved person prior to initiating judicial review of any SEPA action, omission or determination made or taken under this Chapter.
2. A judicial appeal of any SEPA action, omission or determination made or taken under this Chapter must be filed within the time limitations established by any statute or ordinance for appeal of the underlying governmental action.
3. The City shall give official notice of the date and place for commencing a judicial appeal, in accordance with 197-11-680(5) WAC, where there is a statute or ordinance establishing a time limit for commencing judicial appeal.

20.740.700 DEFINITIONS

Sections:

20.740.710 Purpose of this Part and Adoption by Reference.

20.740.720 Additional Definitions.

20.740.710 Purpose of this Part and Adoption by Reference.

Adoption of SEPA regulations. This part contains uniform usage and definitions of terms under SEPA. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-700	Definitions
WAC 197-11-702	Act
WAC 197-11-704	Action
WAC 197-11-706	Addendum
WAC 197-11-708	Adoption
WAC 197-11-710	Affected Tribe
WAC 197-11-712	Affecting
WAC 197-11-714	Agency
WAC 197-11-716	Applicant
WAC 197-11-718	Built Environment

WAC 197-11-720	Categorical Exemption
WAC 197-11-721	Closed Record Appeal
WAC 197-11-722	Consolidated Appeal
WAC 197-11-724	Consulted Agency
WAC 197-11-726	Cost-Benefit Analysis
WAC 197-11-728	County/City
WAC 197-11-730	Decision Maker
WAC 197-11-732	Department
WAC 197-11-734	Determination of Nonsignificance (DNS)
WAC 197-11-736	Determination of Significance (DS)
WAC 197-11-738	EIS
WAC 197-11-740	Environment
WAC 197-11-742	Environmental Checklist
WAC 197-11-744	Environmental Document
WAC 197-11-746	Environmental Review
WAC 197-11-750	Expanded Scoping
WAC 197-11-752	Impacts
WAC 197-11-754	Incorporation by Reference

WAC 197-11-756	Lands Covered by Water
WAC 197-11-758	Lead Agency
WAC 197-11-760	License
WAC 197-11-762	Local Agency
WAC 197-11-764	Major Action
WAC 197-11-766	Mitigated DNS
WAC 197-11-768	Mitigation
WAC 197-11-770	Natural Environment
WAC 197-11-772	NEPA
WAC 197-11-774	Nonproject
WAC 197-11-775	Open Record Hearing
WAC 197-11-776	Phased Review
WAC 197-11-778	Preparation
WAC 197-11-780	Private Project
WAC 197-11-782	Probable
WAC 197-11-784	Proposal
WAC 197-11-786	Reasonable Alternative
WAC 197-11-788	Responsible Official

WAC 197-11-790	SEPA
WAC 197-11-792	Scope
WAC 197-11-793	Scoping
WAC 197-11-794	Significant
WAC 197-11-796	State Agency
WAC 197-11-797	Threshold Determination
WAC 197-11-799	Underlying Governmental Action

20.740.720 Additional Definitions.

See 20.150 Definitions

20.740.800
CATEGORICAL EXEMPTIONS

Sections:

20.740.810 Purpose of this Part and Adoption by Reference.

20.740.820 Use of Exemptions.

20.740.830 Exemption from Threshold Determinations.

20.740.840 Exemption Levels for Minor New Construction.

20.740.810 Purpose of this Part and Adoption by Reference.

Adoption of SEPA regulations. This part contains rules for determining if a proposal is exempt from environmental review under this ordinance. This part also applies optional criteria for exemptions, including establishment of local thresholds, designation of critical areas, and selection of nonexempt actions within those areas. As supplemented by the provisions of this part, the City adopts the following sections of the SEPA rules by reference:

WAC 197-11-305	Categorical Exemptions
WAC 197-11-800	Categorical Exemptions
WAC 197-11-880	Emergencies
WAC 197-11-890	Petitioning DOE to Change Exemptions
WAC 197-11-908	Critical Areas

20.740.820 Use of Exemptions.

A. *Determination of exception.* Each department within the City that receives an application for a license or, in the case of governmental proposals, the department initiating the proposal, shall determine whether the license and/or the proposal is exempt. The department's determination that a proposal is exempt shall be final and not subject to administrative review. If a proposal is exempt, none of the procedural requirements of this ordinance apply to the proposal. The City shall not require completion of an environmental checklist for an exempt proposal.

B. *Identification of licenses.* In determining whether or not a proposal is exempt, the department shall make certain the proposal is properly defined and shall identify the governmental licenses required (197-11-060 WAC). If a proposal includes exempt and nonexempt actions, the department shall determine the lead agency, even if the license application that triggers the department's consideration is exempt.

C. *Proposals with exempt and nonexempt actions.* Subject to the provisions of Section 20.740.920(A) VMC, if a proposal includes both exempt and nonexempt actions, the City may authorize exempt actions prior to compliance with the procedural requirements of this ordinance, except that:

1. The City shall not give authorization for:

   a. Any nonexempt action;

   b. Any action that would have an adverse environmental impact; or

   c. Any action that would limit the choice of alternatives.

2. *Withholding approval of an exempt action.* A department may withhold approval of an exempt action which would lead to modification of the physical environment, when such modification would serve no purpose if nonexempt action(s) subsequently were not approved; and

3. *When substantial financial expenditures result.* A department may withhold approval of exempt actions that would lead to substantial financial expenditures by a private applicant when the expenditures would serve no purpose if nonexempt action(s) were not approved.

20.740.830 Exemption from Threshold Determinations.

A. *Exceptions.* If a proposal fits within any of the exemption provisions in this part, the proposal shall be categorically exempt from threshold determination requirements, except as follows:

1. The proposal is not exempt under WAC 197-11-908 and Chapter 20.720 VMC, critical areas.

2. The proposal is a segment of a proposal that includes:

   a. A series of actions, physically or functionally related to each other, some of which are categorically exempt and some of which are not; or

b. A series of exempt actions that are physically or functionally related to each other and that together may have a probable significant, adverse environmental impact in the judgment of the agency with jurisdiction. If so, that agency shall be the lead agency, unless the agencies with jurisdiction agree that another agency should be the lead agency. Agencies may petition Ecology to resolve disputes, as governed by WAC 197-11-946. For such proposals, the agency or applicant may proceed with the exempt aspects of the proposals, prior to conducting environmental review, if the requirements of WAC 197-11-070 are met.

B. *Documentation of categorically exempt proposals.* An agency is not required to document that a proposal is categorically exempt. Agencies may note on an application that a proposal is categorically exempt or place such a determination in agency files.

20.740.840 Exempt Levels for Minor New Construction.

A. *Minor new construction funding.* Pursuant to discretion and authority contemplated in WAC 197-11-800(c), the city establishes the following exempt levels for "minor new construction," finding, as a matter of fact, that such exempt levels are supported by local conditions, including zoning and other land use plans or regulations, and by the fact that the city is an almost entirely urban and developed area:

1. Residential projects: those containing 200 multifamily dwelling units or fewer, 30 single-family units or fewer, or 100 single-family units or fewer on lots less than 1,500 square feet in size.
2. Agricultural structures: those containing 40,000 gross square feet or less.
3. Office, school, commercial, recreational, service or storage buildings: those containing 30,000 gross square feet or less, and which contains 90 parking spaces or fewer.
4. Parking lots: those containing 90 parking spaces or fewer.
5. Landfills and excavations: those consisting of 1,000 cubic yards or less.

B. *Establishing new exemptions levels.* Whenever the city establishes new exempt levels under this section, it shall send them to the Headquarters Office of Ecology under WAC 197-11-800(1)(c).

20.740.900
AGENCY COMPLIANCE

Sections:

20.740.950 Forms.

Adoption of SEPA regulations. This part contains the rules for agency compliance with SEPA, including rules for charging fees under the SEPA process, listing agencies with environmental expertise, selecting the lead agency, and applying these rules to current agency activities. The City adopts the following sections of the SEPA rules by reference:

WAC 197-11-900	Purpose of this Part
WAC 197-11-902	Agency SEPA Policies
WAC 197-11-904	Agency SEPA Procedures
WAC 197-11-910	Designation of Responsible Official
WAC 197-11-912	Procedures on Consulted Agencies
WAC 197-11-914	SEPA Fees and Costs
WAC 197-11-916	Application to Ongoing Actions
WAC 197-11-920	Agencies with Environmental Expertise
WAC 197-11-922	Lead Agency Rules
WAC 197-11-924	Determining the Lead Agency
WAC 197-11-926	Lead Agency for Governmental Proposals

WAC 197-11-928	Lead Agency for Public and Private Proposals
WAC 197-11-930	Lead Agency for Private Projects with One Agency Jurisdiction
WAC 197-11-932	Lead Agency for Private Projects Requiring Licenses From More Than One Agency, When One of the Agencies is a County/City
WAC 197-11-934	Lead Agency for Private Projects Requiring Licenses From a Local Agency, Not a County/City, and One or More State Agencies
WAC 197-11-936	Lead Agency for Private Projects Requiring Licenses From More Than One State Agency
WAC 197-11-938	Lead Agency for Specific Proposals
WAC 197-11-940	Transfer of Lead Agency Status to a State Agency
WAC 197-11-942	Agreements on Lead Agency Status
WAC 197-11-944	Agreements on Division of Lead Agency Duties
WAC 197-11-946	DOE Resolution of Lead Agency Disputes
WAC 197-11-948	Assumption of Lead Agency Status

20.740.950 Forms.

Adoption of SEPA regulations. The City adopts the following forms and sections of the SEPA rules by reference:

WAC 197-11-960	Environmental Checklist
WAC 197-11-965	Adoption Notice
WAC 197-11-970	Determination of Nonsignificance (DNS)
WAC 197-11-980	Determination of Significance and Scoping Notice (DS)
WAC 197-11-985	Notice of Assumption of Lead Agency Status
WAC 197-11-990	Notice of Action

THE VANCOUVER MUNICIPAL CODE IS CURRENT THROUGH ORDINANCE UPDATE, PASSED UPDATE.

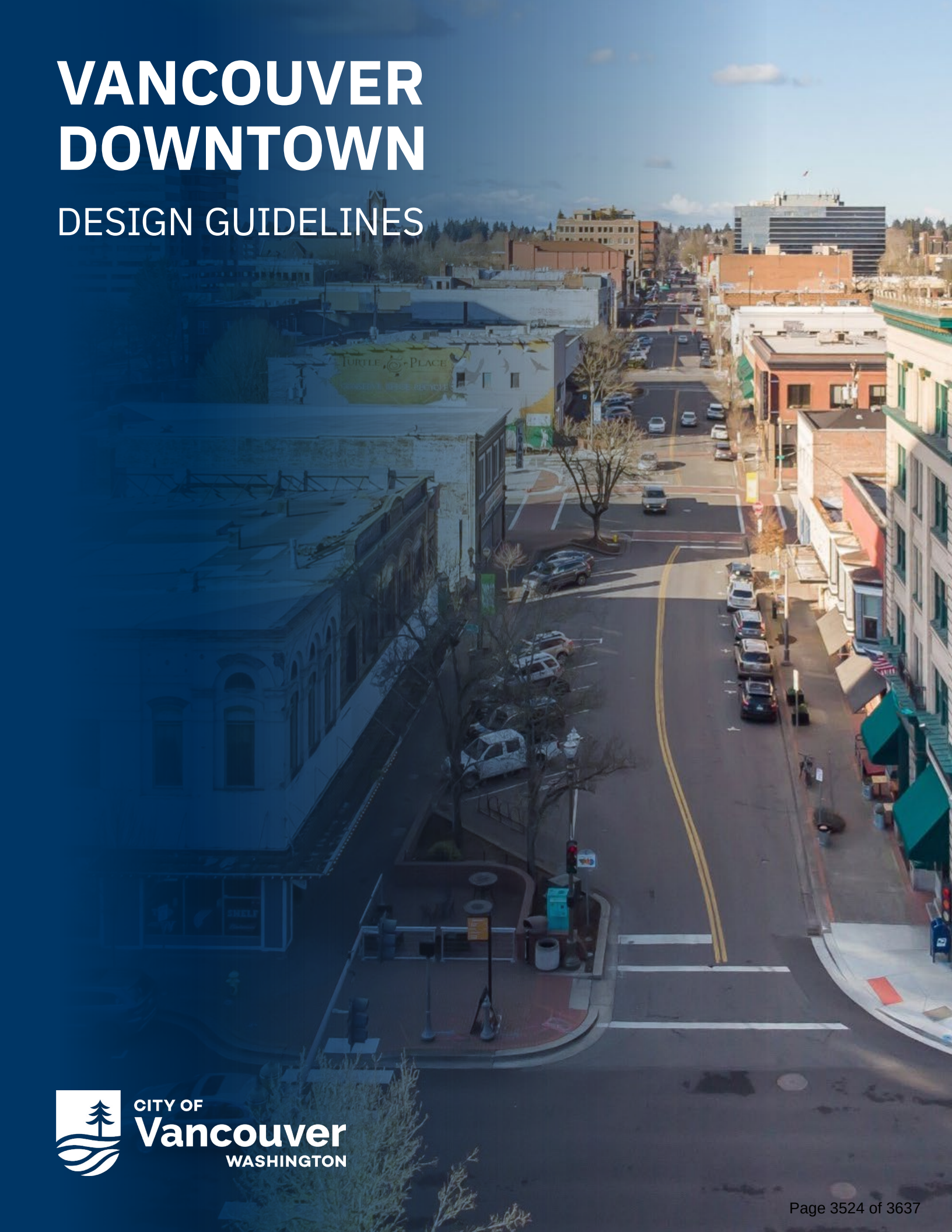
DISCLAIMER: THE CITY CLERK'S OFFICE HAS THE OFFICIAL VERSION OF THE VANCOUVER MUNICIPAL CODE. USERS SHOULD CONTACT THE CITY CLERK'S OFFICE FOR ORDINANCES PASSED SUBSEQUENT TO THE ORDINANCE CITED ABOVE.

CITY WEBSITE: www.cityofvancouver.us
CITY TELEPHONE: (360) 487-8480

Hosted by General Code.

VANCOUVER DOWNTOWN

DESIGN GUIDELINES



CITY OF Vancouver WASHINGTON

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PART I:
INTRODUCTION

Purpose

Background

Design Review Process

PURPOSE

The Vancouver Downtown Design Guidelines Manual (VDDG) is the primary tool used by staff to review the design of potential projects within the Downtown Plan Area. (Figure 1) These design guidelines are a major update to the 1995 document and will serve to inform citizens and developers as to the character of future development. The guidelines in this manual are intended to be used in conjunction with the Zoning Ordinance, Comprehensive Plan, and required design review procedures.

The goals of the VDDG are to:

- Provide a set of guidelines that are easy to understand and administer;
- Ensure the compatibility of new development with the existing historic character of the downtown;
- Maintain quality design and materials;
- Ensure ground floors include interest-creating features that contribute to an active downtown environment; and
- Ensure building designs complement each other and contribute to a cohesive sense of place.

BACKGROUND

Downtown Vancouver is a dynamic and rich mix of residential, cultural, civic, retail and entertainment places that creates a “messy vitality” and attracts residential and office growth, small business, jobs and round-the-clock activity. Downtown is composed of a 200-foot by 200-foot grid with some larger blocks that span across the grid combining two to four blocks together. The 2007 Vancouver City Center Vision (VCCV) plan recognized 5 sub-areas within the VDDG area:

- **Uptown Village (area north of 15th Street)**
- **Mill Plain Couplet (area surrounding the 15th Street and Mill Plain Blvd one-way couplet)**
- **West-side Government (area centered around the government buildings located around the intersection of 12th Street and Franklin Street and the areas to the west)**
- **Esther Short (area surrounding Esther Short Park)**
- **Central Downtown (area south of the Mill Plain Couplet and surrounding the "Main Street" Heritage Overlay District #2.**

While development in the area has gone through several different architectural style eras, the character defining features of both new and old buildings include human-scaled details, facade depth and articulation, and pedestrian focused and active ground floors. The following are key design elements that were identified to either replicate or avoid in order to strengthen the identity and sense of place in Downtown.

Design Elements that Enhance a Sense of Place for Downtown (more of this)

- Active ground floor design that creates interesting and pedestrian focused streetscape.
- Ground floor building articulation and craftsmanship that provides human-scale details.
- Fenestration is offset from the primary facade to provide visual interest and shadow lines.
- A vertical rhythm and pattern to the fenestration and facade articulation.
- Use of brick and masonry as the primary facade material, particularly at the ground level.

Design Elements that Need Improvement (less of this)

- Ground floor facades dominated by parking, utilities, and blank walls.
- Overly flat facades with limited to no articulation, modulation, or depth of fenestration to provide shadow lines and visual interest.
- High-rise buildings stepped back from the building line and located above parking structures.
- Large flat facades dominated by horizontal glazing with little to no human-scaled details.


CITY HALL


Columbia St




LIBRARY


NO TRUCK TURNS
Broadway ST







Figure 1—Downtown Design Guidelines Plan Area



DESIGN REVIEW PROCESS

All projects will be reviewed for compliance with the design guidelines, zoning code, and other municipal documents that govern development.

The VDDG Manual is organized around key design topics. Each design topic includes an **Intent Statement** that outlines the design goals for each topic. A series of **Guidelines** follow for each topic outlining design guidance on how to meet the design intent for each topic. **Addressing guidelines are a requirement of design approval.** If a guideline is not fully complied with, the applicant shall provide an alternative that achieves the intent of the guideline and show how the alternative furthers the "do" examples and not the "do not" examples in the guidelines. To further explain intent and the design guidelines, diagrams and images are provided for reference. Precedents are shown to illustrate recommended and not recommended design details.

A **VDDG Checklist** is provided in Appendix A that summarizes the design requirements and is required to be completed and submitted along with project application for review. Applicants shall fill out the checklist and provide a narrative description and supporting drawings that document compliance with the design guidelines.

Projects that include historic resources are subject to additional design review and standards. These projects shall follow the Secretary of the Interior Standards. Where these projects include new construction or additions, the project may be subject to design review in relation to applicable design guidelines in the VDDG.

PART II: DESIGN GUIDELINES

1. Building + Design

2. Active Ground Floor Design

3. Lighting

4. Signage

5. Mechanical Equipment, Utilities, and Service Areas

6. Vehicle Access and Parking Design

7. "Main Street" Heritage Overlay District #2

1. BUILDING + DESIGN

1.1. Massing & Articulation
1.2. High-rise Massing
1.3. Fenestration
1.4. Roofscapes + Green Roofs
1.5. Materials

1.1. Massing & Articulation

1.1.1. Block Scale

INTENT
To break down the massing of super-block sites, and provide new pedestrian connections and new publicly accessible open spaces.

A. Block Size.

1. Where existing properties span multiple combined blocks, new development should recreate an approximate 200-feet by 200-feet grid by extending the sight lines of the existing street network through the creation of new publicly accessible pathways, open spaces, or streets.

1.1.2. Facade Design

INTENT
To break down the massing of block-scaled buildings and create pedestrian-scaled facades with a vertical rhythm and pattern that reflects the building's use.

A. Modulations.

1. Continuous building facades greater than 150 feet in length should have a minimum of one modulation. (Modulations should meet the modulation guidelines below).
2. Continuous residential building facades greater than 100 feet in length should have one or more modulations. (Modulations should meet the modulation guidelines below).

Definition:

Modulation. A modulation is a change in the massing of a facade plane. A modulation may be projections, recessions, or a change in facade plane that creates distinct facade sections. Size and depth of a modulation may vary but generally modulations are a change in a facade plane that exceed 18 inches in depth.

B. Modulation Design

1. Facade modulations may be a combination of recesses and projections.
2. Modulation and articulation of the ground floor should complement and align with the modulation and articulation of upper floors.



Example with two modulations that break the facade into three distinct massing elements. The breaks are emphasized with a change in color and material. Modulation and articulation of the ground floor complement and align with upper floors.



Example with combination of balcony projections and recessed modulations.

3. The facade modulation, at a minimum, should extend from the second floor through the roof plane.



Example of facade modulation extending through the roof plane creates distinct upper floor massing elements.



Example of modulation design of top floors that complement the ground floor design.

4. If more than one modulation is provided, balconies may occur within the facade modulation. To ensure the facade modulation is visible, balconies should be projected or recessed from the primary facade plane, approximately 8 inches or more.



Example of building with multiple modulation recesses with balcony projections. Modulations begin at the second floor.



Example of building with multiple modulations that extend from the ground floor through the roof plane.



DON'T: *Create buildings with long flat facades. Design buildings to have modulations that reflect a residential rhythm and pattern.*

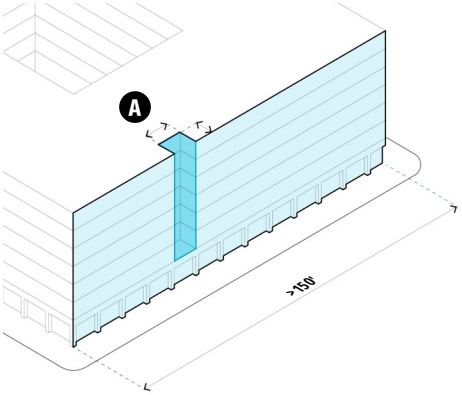


DON'T: *Create flat facades with only balcony projections and no facade modulation that result in an overly flat facade appearance.*

C. Modulation Size

1. Modulations in the facade plane should be sized depending on overall length of the facade and the number of modulations per facade:
   a. If only one modulation is provided, the modulation should have a minimum width of approximately 8 to 12 feet and a minimum depth of approximately 8 to 10 feet. (Figure 2)
   b. If two modulations are provided, the modulation should have a minimum width of approximately 6 to 8 feet and a minimum depth of approximately 4 to 6 feet. (Figure 3)
   c. If three or more modulations are provided, the modulations should have a minimum width of 6 feet and a minimum depth of 3 feet. (Figure 4)
2. The facade modulation may be of less depth if combined with a change/contrast in material/ color and/or a variation in the fenestration pattern.

Figure 2—One modulation



A The modulation should have a minimum width of 8 to 12 ft. and a minimum depth of 8 to 10 ft.

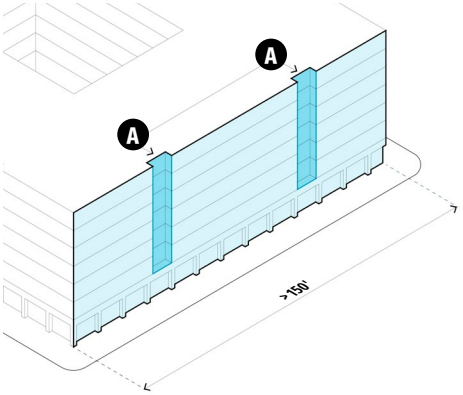


Example of facade with single major break.

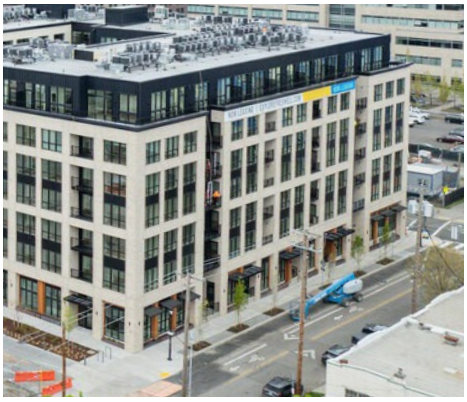


Example of facade with minimum modulations but a change in material and color that breaks up the building into three distinct massing elements.

Figure 3—Two modulations



A The modulations should have a minimum width of 6 to 8 ft. and a minimum depth of 4 to 6 ft.

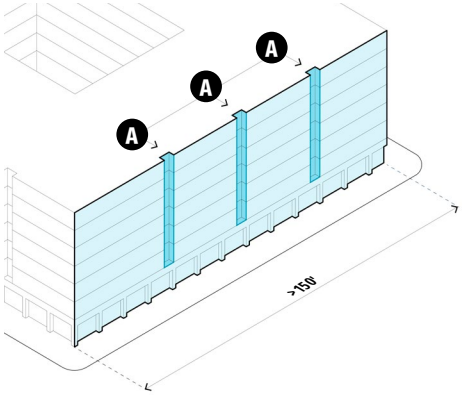


Example of facade with 2 modulations.



Example of facade with 2 modulations.

Figure 4—Three or more modulations



A The modulations should have a minimum width of 6 ft. and a minimum depth of 3 ft.



Example of facade with multiple modulations with an approximate depth of 3 feet.

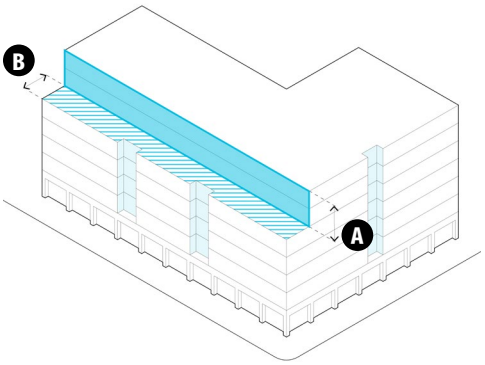


DON'T: *Create buildings with long flat facades without any modulations.*

D. Modulation Exemption.

1. If the top one or two stories of a facade plane are stepped back a minimum 6 feet from the building line and facade plane below, the stepped back facade plane is exempt from the modulation guidelines noted in C above. (Figure 5)

Figure 5—Top Stories Modulation Exemption

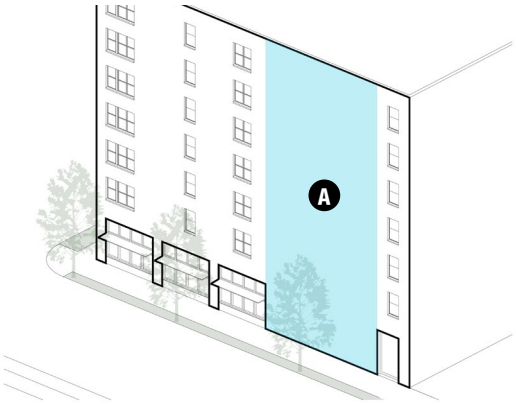


A Top 1 or 2 stories are exempt from the modulation guidelines if minimum step back provided.

B Minimum step back of 6 feet required for exemption from modulation guidelines.

E. Blank Walls.

1. Large, blank walls should be avoided on facades that face public streets or other publicly accessible spaces. Any wall sections should not exceed 30 linear feet in length without windows and facade articulation.



A Example of large blank wall areas between fenestration elements.



DON'T: *Create blank walls longer than 30 linear feet along sidewalks or other publicly accessible spaces.*

1.2. High-rise Massing

1.2.1. Meeting the Public Realm

INTENT

To provide unique moments and place making opportunities throughout downtown where high-rise projects are located.

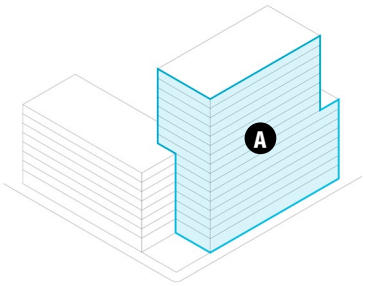
To integrate high-rise towers into the ground-level public realm.

A. Anchor the tower buildings to the public realm by extending a portion of any high-rise portion of the building to the ground plane. (Figure 6)

B. Primary building entrances should be located within or directly adjacent to the tower portion of the building. Primary building entries should be clearly identifiable and prominent elements of the building facade. (Figure 7)

C. Corner mini park. High-rise buildings greater than 85 feet in height are encouraged to provide a corner mini-park or plaza. The mini-park or plaza should have a minimum dimension of 25 feet and a minimum area of 1,000 sf. The mini-park or plaza should be publicly accessible and may have a private area for outdoor dining that does not exceed half the size of the open space. (Figure 8)

Figure 6—Anchored tower buildings

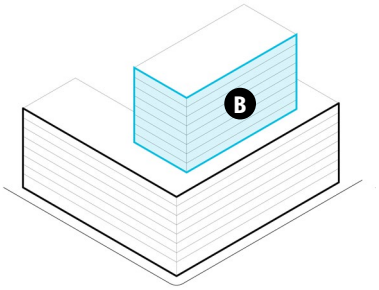


A DO anchor tower buildings to the ground plane.



DO *Anchor the tower portion of the building to the ground plane.*

Figure 7—Unanchored tower buildings

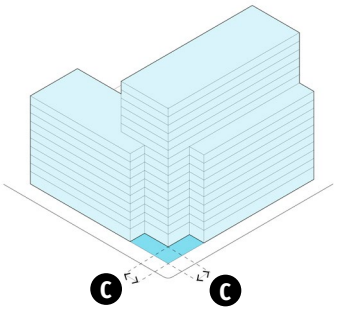


B DO NOT have tower buildings disconnected from the ground plane.



DON'T *Disconnect the tower portion of the building from the ground plane.*

Figure 8—Corner mini park



C DO provide corner mini-parks or plazas for high-rise buildings.



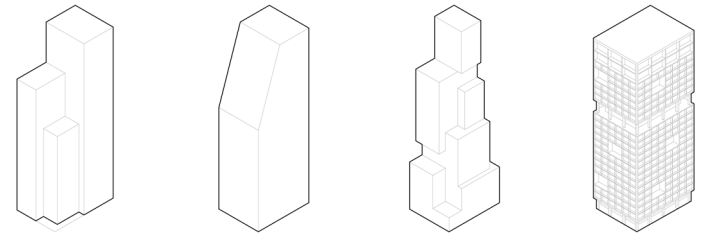
DO *Provide corner mini-park or plaza.*

1.2.2. Skyline Massing and Design

INTENT
To create an iconic and beautiful skyline that becomes a symbol and landmark of Downtown Vancouver.
To create visually interesting buildings and avoid monolithic boxes without shape or articulation.

A. Skyline. To create a visually appealing and interesting skyline, high-rise towers greater than 120 feet in height should do one of the following:

1. **Stepped Massing:** Reduce upper floor massing through one or more upper floor step backs.
2. **Tapered Massing:** Reduce the massing of upper floors through reducing the size of the floor plates as the building rises in height.
3. **Sculpted Massing:** Combine vertical and horizontal massing modulations to create interesting facade changes throughout the high-rise tower.
4. **Facade Articulation:** Use deep punched openings, changes in window patterns, and/or artistic architectural details like fins, shading devices, or cornices to create ornamental facade articulation.





Stepped Massing



Tapered Massing



Sculpted Massing



Facade Articulation

1.3. Fenestration

1.3.1. Window Design

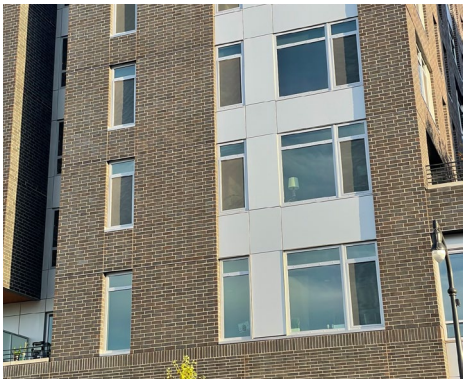
INTENT
To avoid flat facades and provide human-scaled architecture elements that create visual interest and shadow lines.

A. Fenestration on facades facing a public street, right-of-way or publicly accessible open space should follow the guidelines listed below (portions of a building with glass curtain wall systems are exempt):

1. Window panes should be recessed 2 to 6 inches from facade plane.
2. Windows that are flat or "flush" with the facade are prohibited unless:
   a. Applied to a portion of a building that is part of a facade recess/inset with a minimum 4 inches in depth. The portion of the building that is recessed should have a maximum width of 20 feet.
   b. Framed or include a lintel and mantel with a minimum projection of 2 to 6 inches from the facade.



DO *Recess windows from the facade plane to create facade depth and shadows.*



DO *Have windows that may be flat or "flush" with facade, if applied to a portion of a building that is part of a facade recess/inset.*



DON'T Have flat or "flush" windows compose large sections of a building facade.

1.3.2. Glass Curtain Walls

INTENT
To maintain the materiality and character of downtown.

A. Buildings with 100% glass curtain wall facades are discouraged. Glass curtain walls may be used as a building accent.

B. Glass curtain walls should not exceed 50% of any single facade facing east, south, and west.



Example of a building with glass curtain wall accent.



Example of a building with glass curtain walls that do not exceed 50% of any single facade.



DON'T *Create buildings with 100% glass curtain wall.*

1.3.3. Bird Safe Design

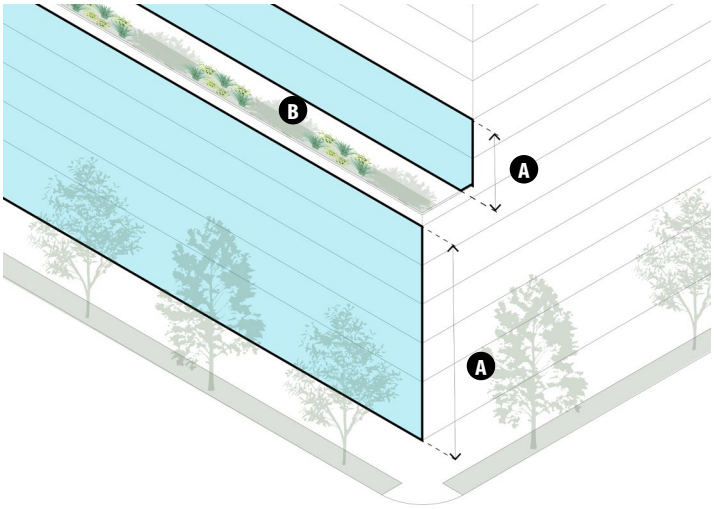
INTENT
To limit the number of bird collisions by reducing the facade area of reflective materials that mimic bird habitat areas such as trees and vegetation.

A. For new buildings, facade area between the ground and 60 feet or within 15 feet above a green roof and a glazing percentage greater than 30% should be designed with bird-friendly glazing treatments. (Figure 9) The glazing percentage guideline applies per facade.

B. Bird-friendly glazing treatments include the use of opaque glass, the covering of clear glass surface with patterns, the use of paned glass with fenestration patterns, and the use of external screens and/or netting over non reflective glass.

C. Visual traps such as areas of glass through which trees, landscape areas, water features or the sky are visible from the exterior, should be avoided unless a bird safety treatment is used.

Figure 9—Bird Safe Facade Design



A Facade area between the ground and 60 feet should be designed with bird-friendly glazing treatments.

B Green Roof

1.4. Roofscapes + Green Roofs

1.4.1. Roofscapes

INTENT
To design roofscapes as a fifth facade when visible from above, integrate roof penthouses into building design, and reduce impact of roofscapes in the creation of an urban heat island effect.

A. Roof areas adjacent to or below occupied upper floors should be designed to provide a visually appealing roofscape. Green roofs are encouraged.

B. Stair, elevator, and mechanical penthouses should be designed to minimize visibility from the street or integrated within the facade design of the building.

C. Roofscapes are encouraged to be designed as cool roofs with materials that reduce the amount of heat transfer into the building and surrounding area.

1.4.2. Green Roofs

INTENT
To ensure adequate planting conditions for green roofs that will contribute to the urban ecology of downtown.

A. Topography. Varied topography, soil materials, and soil textures are critical in supporting more diverse plantings, pollinators, and a greater range of ecological functions. Engineered soil should be placed at varying depths to mimic the natural undulation of native habitat. This will help to represent the structural contrast that plant species with varying root depths and ground-nesting pollinators rely on.

B. Vegetation.

1. Vegetation should be low maintenance, drought-tolerant, hardy, and perennial or self-sowing.
2. Over 50% of vegetation should be evergreen species.
3. Vegetation should achieve 90% coverage within 2 years of planting.

C. Soils. Green roof soil depth should satisfy the following requirements to support healthy native plants.

1. Minimum soil depth of 4-12 inches for ground cover, 20 inches for shrubs, and 36 inches for trees.
2. Soil depth should be strategically varied across the green roof to accommodate the needs of various plant communities.

D. Photovoltaic (PV) panels may be co-located with green roofs on flat roofs where feasible. PV panels should be clustered together to allow for sunlight penetration to the green roof beneath.

1.5. Materials

INTENT
To improve the overall appearance of buildings and to have building character express longevity and permanence through high quality materials that will maintain quality of appearance over time. To create a consistent character and identity for downtown.

A. Building materials should be of a high-quality and chosen for the product's longevity and sustainability. Sustainability considerations should include the sourcing of materials, distance and material travels, carbon impact, and maintenance requirements.

B. Within the design review area, provide brick, brick veneer, terracotta, ceramic tiles, masonry or other durable materials with human-scaled textures and/or patterns that provide visual interest as the primary facade material on the ground floor of the structure.

C. Mass timber buildings may be exempt from this standard to express the structural facade elements. High-quality low carbon concrete may be used if detailed with human-scaled elements.

2. ACTIVE GROUND FLOOR DESIGN

INTENT
To ensure ground floor frontages focus on interest-creating facades lined with active uses or designed to show regular habitation and activity. Active ground floor uses include retail, restaurants, or other service-oriented spaces but may also include residential units, residential accessory spaces, or office space if designed to interact with and contribute to the pedestrian realm and sidewalk character while ensuring an appropriate level of privacy for the ground floor occupants.

2.1. Building Entrances
2.2. Retail/Commercial Ground Floors
2.3. Office/Professional Services
2.4. Live/Work
2.5. Residential
2.6. Rain/Weather Protection

2.1. Building Entrances

INTENT
To support wayfinding and create easily identifiable entrances that are proportional in size to the scale of the building and number of people served.

A. Primary Building Entrances.

1. Primary entrances should be prominent and easily identifiable through accentuated architectural details such as awnings, projections or recesses.
2. The primary entrances to upper floor uses should orient to public streets and open spaces.

B. Entry/Lobby Design

1. A stairway should be co-located with building lobbies and elevator access points.
2. The stairway is encouraged to be designed to be inviting and include fenestration for natural lighting.



Example of a primary entrance oriented towards a public street.



Example of a prominent and easily identifiable primary entrance.

Definition:
Primary Building Entry. The main public entrance to the upper floors of a building.

2.2. Retail/Commercial Ground Floors

INTENT
To provide retail spaces that are inviting, provide transparency into interior spaces, and are flexibly designed for a range of tenants.

A. Retail-ready Ground Floors.

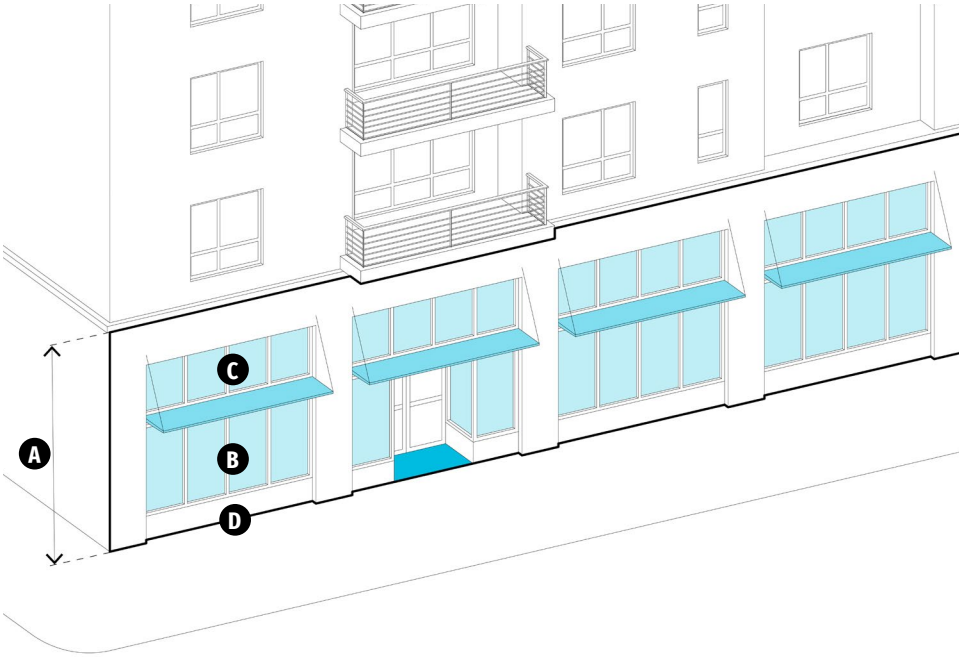
1. Retail-ready ground floors, where required, should have a minimum depth of 25 feet. Greater depth in high-retail areas is encouraged to serve the needs of a variety of retail tenants or provide more storefronts per linear frontage.
2. Retail-ready ground floors should be designed to include or be retrofitted with at least one entrance for each 30 feet on linear frontage.
3. Retail-ready ground floors should be designed to incorporate venting for potential restaurant tenants, even if venting is not installed during initial construction.

B. Minimum floor-to-floor height. Retail and retail-ready ground floors should have a minimum floor-to-floor height of 18 feet. Retail in areas where retail-ready is not required may have a minimum 14 feet floor-to-floor height.

C. Storefront Facade.

1. Storefront/retail facades should maximize transparent glazing between 2 and 7 feet in height from the sidewalk grade, approximately 60% or more of the facade area.
2. Transom windows are encouraged to bring natural light into commercial spaces.
3. Bulkheads and solid walls, if provided, should measure approximately 12 to 24 inches from finished grade.

Figure 10—Retail/Commercial Ground Floors





Example of a transparent and inviting retail/ commercial frontage on the ground floor.

A Minimum floor-to-floor height.

B Maximize transparent glazing between 2 and 7 feet in height.

C Transom windows are encouraged to bring natural light into commercial spaces.

D Bulkheads and solid walls, if provided, should measure approximately 12 to 24 inches from finished grade.

2.3. Office/Professional Services

INTENT

To ensure ground floor space for office and professional services activate the public realm through adding visual depth and transparency into a building's interior.

To maintain a level of privacy through building setbacks and landscaping so temporary window coverings are not permanently closed.

A. Floor-to-floor height. Ground floor office space should have a minimum floor-to-floor height of 15 feet or a minimum floor-to-ceiling height of 12 feet.

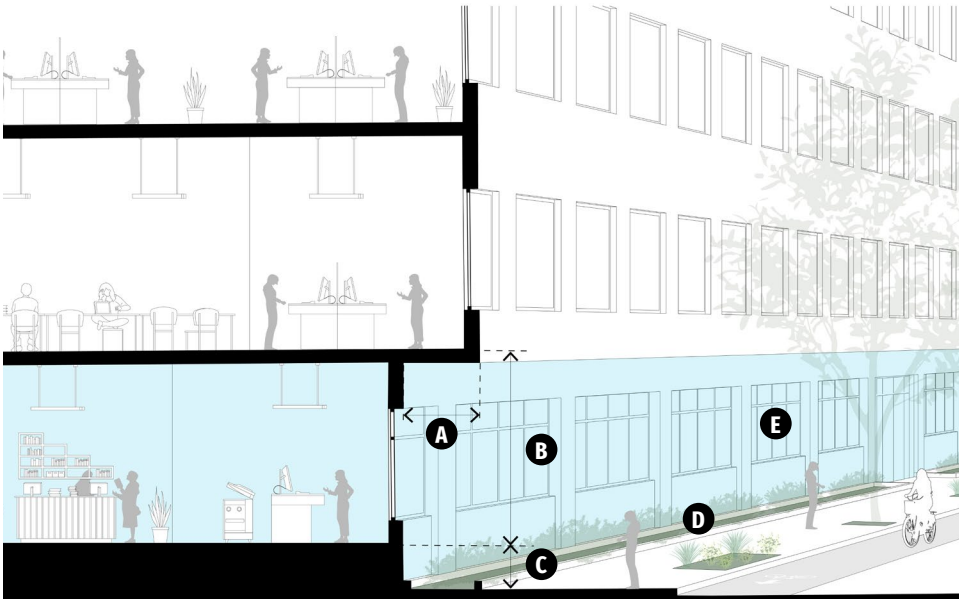
B. Non-communal spaces should be 2-3 feet above sidewalk grade to provide privacy to office work spaces. Professional services or other spaces that have direct access to the sidewalk may be at sidewalk grade.

C. Setback. Ground floor office work spaces should be setback a minimum of 3 feet to provide space for a landscape buffer.

D. Landscaping. Setback area should maximize landscaping, generally 60% or more of the setback area.

E. Fenestration. Ground floor office should maximize transparent glazing between 3 and 8 feet in height from the finished floor of the office space.

Figure 11—Office/Professional Services Ground Floor





Example of a ground floor office and professional services space activating the public realm through adding visual depth and transparency.

A Minimum of 3 feet setback to provide space for a landscape buffer.

B Ground floor office space should have a minimum floor-to-floor height of 15 feet or a minimum floor-to-ceiling height greater than 12 feet.

C Non-communal spaces should be 2-3 feet above sidewalk grade to provide privacy to office uses.

D Setback area should maximize landscaping, generally 60% or more of the setback area.

E Maximize transparent glazing between 3 and 8 feet in height from the finished floor of the office space.

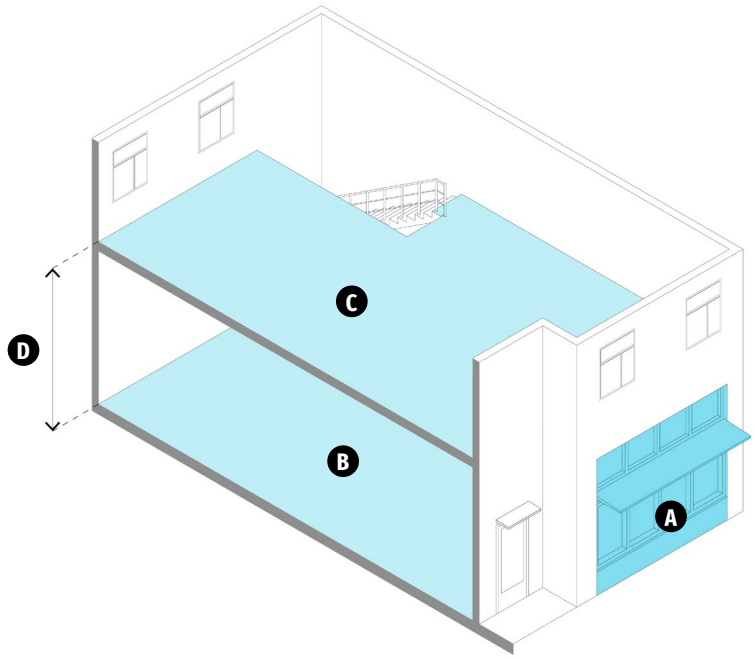
2.4. Live/Work

INTENT
To ensure that live/work units contribute to creating an active storefront character and provide active ground floor frontages.

A. Floor-to-floor height. Floor-to-floor height. Live/work units should have a minimum floor-to-floor height of 15 feet on the ground floor, or a minimum floor-to-floor height of 18 feet for live/work units with a mezzanine.

B. Fenestration. Live/work units should have a minimum 50% of their facade area designed with a storefront character; and live/work unit's storefront areas should maximize transparent glazing between 2 and 7 feet in height from the sidewalk grade.

Figure 12—Live/Work Typology





Example of live/work unit with storefront character.

A Minimum 50% of facade area should be designed with a storefront character.

B Work component.

C Residential component.

D Live/work units should have a minimum floor-to-floor height of 15 feet on the ground floor.

2.5. Residential

2.5.1. Residential Units

INTENT

To ensure ground floor residential units create activity and enhance the public realm through direct interaction with the sidewalk through stoop unit entries, balconies or porches.

To maintain privacy through raising units above sidewalk grade and setting ground floor units back from the building line to provide space for landscaping.

To create a more residential feel with increased setbacks for buildings north of 15th Street while allowing for more urban ground floors with limited setbacks south of 15th Street.

A. Ground floor residential units should be raised a minimum of 2 feet and not more than 6 feet above sidewalk grade, on average per facade.

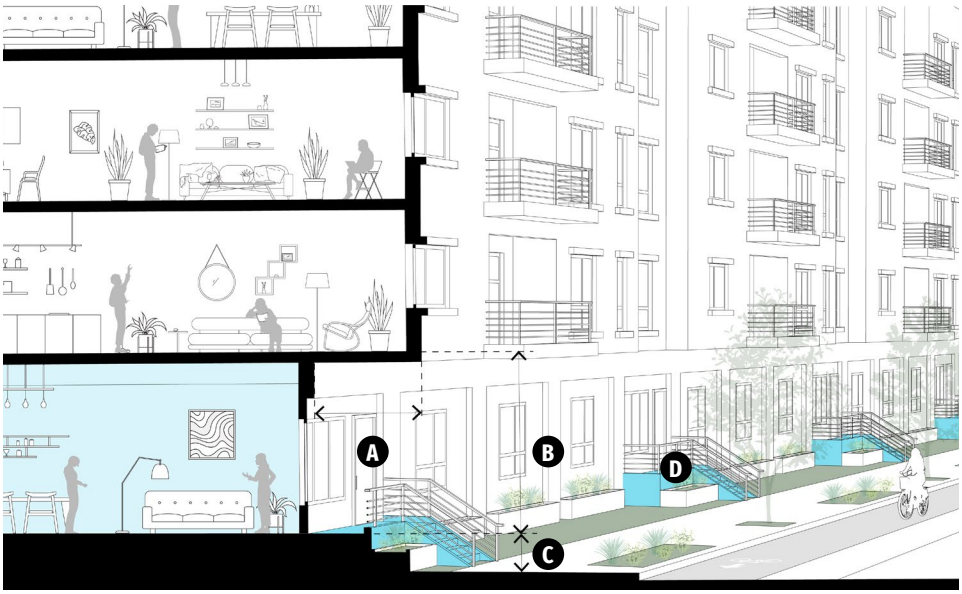
B. The ground floor unit should have a minimum floor-to-floor height of 10 feet.

C. Ground floor units are encouraged to have stoop entries.

D. North of 15th Street.

1. Ground floor residential units north of 15th Street should be setback a minimum of 3-5 feet from the building line.
2. Entrances to ground floor units should be setback a minimum of 5 feet from the building line to provide an entrance area and room for stoops.

Figure 13—Residential Ground Floor (North of 15th Street)





Example of a ground floor residential unit activating the public realm through stoops and patios in the setback area.

A Ground floor residential units should be setback a minimum of 3-5 feet from the building line.

B The ground floor unit should have a minimum floor-to-floor height of 10 feet.

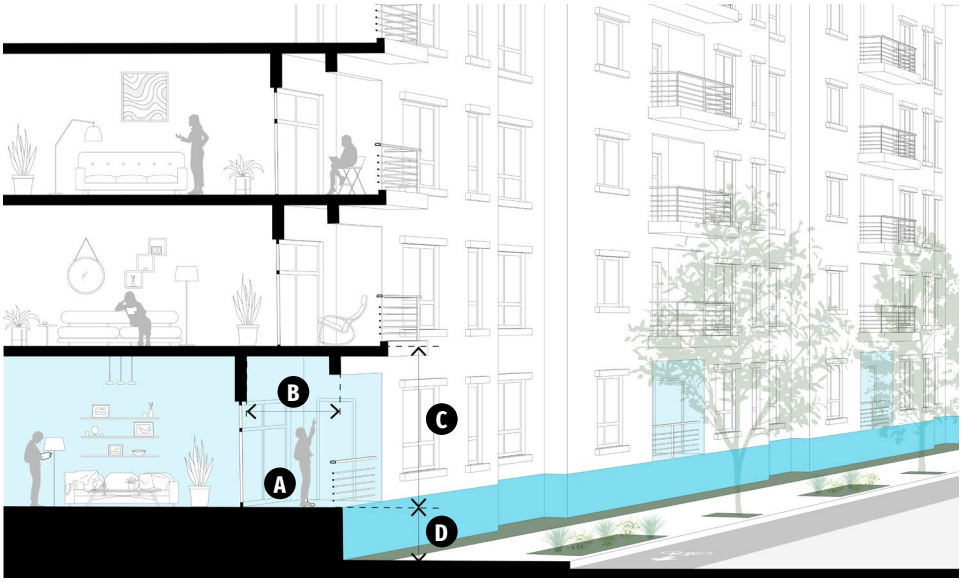
C Ground floor residential units should be raised a minimum of 2 feet and not more than 6 feet above sidewalk grade.

D Ground floor units are encouraged to have stoop entries.

E. South of 15th Street

1. Ground floor residential units with a setback of 3-5 feet from the building line should be raised a minimum of 2 feet and not more than 6 feet above sidewalk grade.
2. Ground floor residential units without a setback of 3-5 feet from the building line should be raised a minimum of 3 feet and not more than 6 feet above sidewalk grade.
3. Ground floor units should include ground floor balcony spaces if stoops are not provided. Balconies should have a minimum depth of 6 feet.

Figure 14—Residential Ground Floor (South of 15th Street)





Example of a ground floor residential activating the public realm through balcony and providing privacy through ground floor height raised above sidewalk grade.

A Ground floor units south of 15th Street should include ground floor balcony spaces if stoops are not provided.

B Ground floor unit balcony spaces should have a minimum depth of 6 feet.

C The ground floor unit should have a minimum floor-to-floor height of 10 feet.

D Ground floor residential units should be raised a minimum of 3 feet and not more than 6 feet above sidewalk grade for units that are not setback from the building line.

2.5.2. Residential Accessory Spaces

INTENT
To design and locate residential accessory spaces to activate and provide visual interest to the public realm.

A. Ground floor accessory spaces fronting a street should be designed to activate the street through views into a building's active common spaces. Common spaces that activate the ground floor may include shared lounges, event spaces and leasing offices, or other similar spaces.

B. Ground floor residential accessory spaces should have a minimum floor-to-ceiling height greater than 10 feet.

C. Bike parking and/or bike rooms, utility rooms, storage rooms, mechanical rooms or other similar spaces should not be located at the corner of a building.

2.6. Rain/Weather Protection

INTENT
To provide weather protection and comfort for pedestrians that enhances the design of ground floor facades.

2.6.1. Locations

A. Rain/weather protection may be an awning, overhang, marquee, free-standing shelter, arcade or other architectural features.

B. Rain/weather protection should be provided at the following locations:

1. All primary building entrances.
2. All areas with retail-ready ground floors or where retail-ready ground floors are required.
3. Entrances to ground floor residential uses and office spaces.

2.6.2. Primary Building Entrances

A. At primary building entrances, rain/weather protection should be

1. A minimum 10 feet in width at primary building entrances.
2. Distinguished in design from other ground floor rain/weather protection.
3. A minimum 2 feet higher than adjacent rain/weather protection.

B. At primary building entrances, rain/weather protection should be located between 10 and 20 feet in height above sidewalk grade. (Figure 15)

2.6.3. Retail Frontages

A. At retail and retail-ready ground floor locations, rain/weather protection should

1. Extend the length of retail-ready ground floor.
2. Include clerestory windows above rain/weather protection overhang to increase natural light into the building spaces.
3. Not extend across building columns or create segments greater than 35 feet in length unless part of an arcade structure.
4. Integrate signage into rain/weather protection structure.

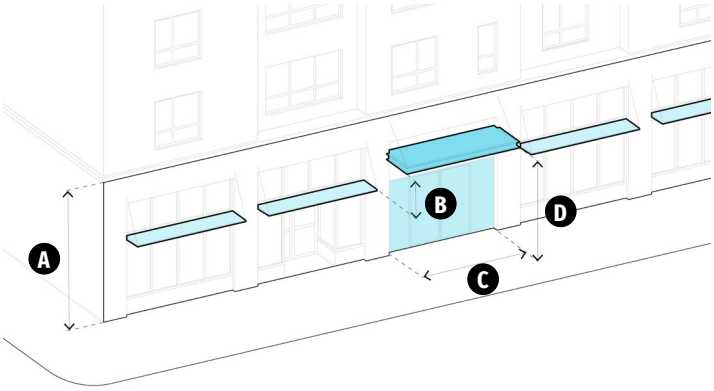
2.6.4. Ground Floor Residential and Office Entrances

A. At ground floor unit and office space entrances, rain/weather protection should be a minimum 6 feet wide.

2.6.5. Materials

A. Cloth and fabric awnings are prohibited unless part of a retractable awning over an outdoor dining area.

Figure 15—Primary Building Entrances

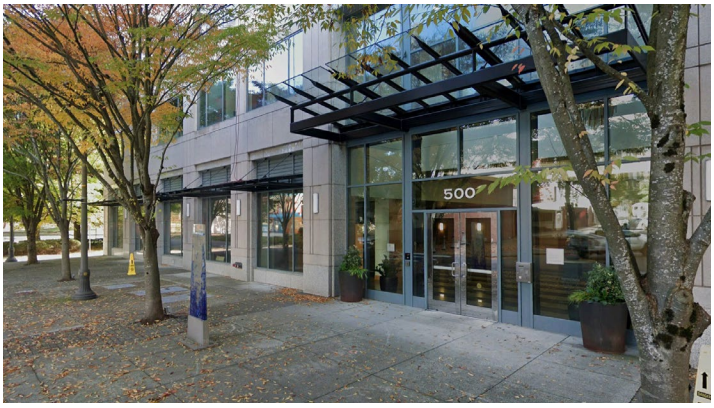


A Minimum floor-to-floor height of 18 feet or a minimum floor-to-ceiling height greater than 15 feet.

B Rain/weather protection at primary building entrances should be a minimum 2 feet higher than adjacent rain/weather protection.

C Minimum 10 feet in width at primary building entrances.

D Rain/weather protection should be located between 10 and 20 feet in height above sidewalk grade.



Example of a primary building entrance awning that is higher than the adjacent awning.



Example of an active retail frontage with weather protection with clerestory windows above.

3. LIGHTING

INTENT
To provide clear wayfinding and pedestrian lighting that enhances the architectural character. To limit the impact of lighting on the environment and adjacent properties.

3.1. Building + Site Lighting
3.2. Dark Sky
3.3. Skyline and Beacon Lighting

3.1. Building + Site Lighting

A. Pedestrian-Oriented Lighting. Pedestrian-scaled lighting should be provided along active frontages and should highlight building entrances. Pedestrian-oriented lighting should be placed along pedestrian pathways, multi-use pathways and other walkways at minimum intervals of every 25-50 feet to improve pedestrian comfort, security, and safety.

B. Architectural Compatibility. Exterior lighting fixtures should be architecturally integrated with the building style, materials, and colors.

C. Attachment. Fixtures on buildings should be attached only to walls, eaves, or weather protection, and the top of the fixture should not exceed the height of the parapet, roof, or eave of the roof.

D. Rooftop. Rooftop open space lighting should be minimized and should be turned off outside of normal usage hours.

3.2. Dark Sky

A. Lighting Plan. An outdoor lighting plan must be submitted along with a compliance statement that the development will comply with all guidelines. The lighting plan shall be prepared by a certified lighting professional or licensed professional engineer using lighting design software.

B. Light Trespass.

1. Light Trespass leaving a property onto adjacent public right-of-way should be no greater than 3 Lux when measured 20 feet past the property line.
2. All lights should be directed, oriented, and shielded to prevent light trespass or glare onto adjacent properties. All luminaries should meet the most recently adopted criteria of the Illuminating Engineering Society of North America (IESNA) for “Cut Off” or “Full Cut Off” luminaries. (Figure 16).

C. Lighting Intensity. Lighting should use the lowest level of light necessary. Unless otherwise specified in this ordinance, lighting installed for an outdoor use shall not exceed 25% more than the Light Level recommended by the applicable ANSI/IES Lighting Standard, or a state approved alternate. No lights should be installed on the property capable of exceeding a total output greater than 3,000 Lumens.

D. Time. Lighting should be limited to essential time periods for lighting. Controls such as timer or motion detectors should be used to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.

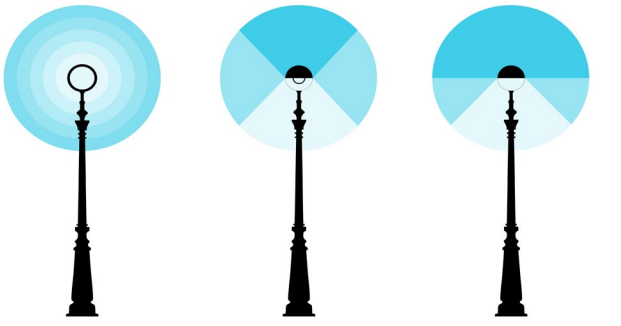
E. Color/Temperature. General site and parking lot lighting should have a nominal correlated color temperature (CCT) of no greater than 3000 Kelvin. Cooler/whiter lighting above 3000 Kelvin in CCT should be limited to areas where a more accurate color rendition is important, including building entrances and exits (for security reasons), and lighting of signs.

3.3. Skyline and Beacon Lighting

A. Buildings should not have special, “beacon” lighting that highlights a building’s top floor, roof structure, or parapet.

B. Dynamic “art lighting” with moving lights or graphics are prohibited above the ground floor.

Figure 16—Street Lighting Guidelines



BAD *Non-Cutoff* **BETTER** *Semi-Cutoff* **BEST** *Full Cutoff*

4. SIGNAGE

INTENT

To create an integrated and cohesive signage strategy that complements a building's architectural character.

To ease wayfinding and provide visual interest and identity.

4.1. General

4.2. Retail Signage Retail Signage

4.1. General

A. The number and size of signs are regulated by the City's sign ordinance (VMC 20.82). In some instances, the maximum amount of signage permitted may allow multiple signs. Wherever possible, the allowable sign area should be consolidated into the minimum number of signs consistent with the design of the project and needs of the occupant.

B. Materials. Paper, cloth, vinyl and other such materials that create an impermanent appearance when used as signs are strongly discouraged.

C. Signs should be designed and placed so they complement the overall facade composition.

D. Signs should be located so that building details will not be covered or otherwise obscured.

E. Free-standing pole signs and monument-type signs for individual commercial establishments are strongly discouraged.

F. Signage should be oriented to pedestrians.

G. Each building should have only one primary sign on any one building face.

H. Building signage above 45 feet in height is discouraged.

I. Signage for building tenants is prohibited above the 2nd story except for hotel and hospitality uses.

J. Large scale signage visible from the freeway or other areas of the city is prohibited.

4.2. Retail Signage

A. Retail signage should be integrated into the building and weather protection design.

B. Blade, fin and pendant signs perpendicular to the sidewalk are encouraged to provide more visible signage for pedestrians.



DO *Design and place signs to complement the overall facade composition.*



DO *Integrate freestanding signs into the landscape design.*



DON'T *Design over dominating building signage that does not complement facade composition and materiality.*



DO *Orient tenant signage to the pedestrian.*



DO *Integrate retail signage into the building and weather protection design.*



DON'T *Create large scale signage visible from distance.*



DO *Design and place signs to complement the overall facade composition.*



DO *Design and place blade signs that are perpendicular to the sidewalk.*



DON'T *Use materials for signage that create an impermanent appearance.*

5. MECHANICAL EQUIPMENT, UTILITIES, AND SERVICE AREAS

INTENT

To limit the visual impact of utilities and mechanical equipment.

To ensure that mechanical, utilities, and services are designed to complement the building design.

5.1. Ground Floor Facades

5.2. Wall Vents and Facade Mounted Equipment

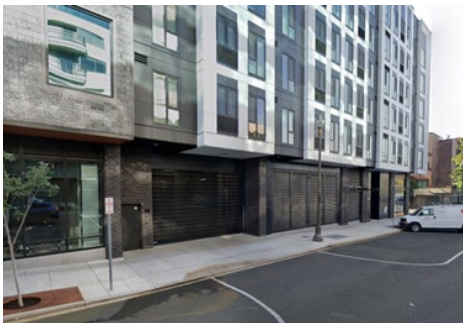
5.3. Mechanical Equipment Screening

5.1. Ground Floor Facades

A. Service, utility, mechanical and loading areas should be provided at the rear of buildings or incorporated into parking areas, if possible. If fronting a public right-of-way or publicly accessible area, they should be located on the secondary street, typically the east/west streets.

B. Service, utility, mechanical and loading areas should be designed to minimize impact to the pedestrian experience and integrate into the overall architectural character.

1. Design interior spaces to minimize overall street frontage length of service areas.
2. Integrate service and loading areas into building architecture through using matching or complementing rhythm and pattern of upper floors.
3. Use same material palette and quality of materials as active building frontages.
4. Use a variety of materials and/or changes in facade plane to break up large service areas.
5. Recess swinging doors and vehicle entrances. (Doors used solely during emergencies are not required to be recessed).



DO *Use a variety of materials and changes in the facade plane to break up large service area facades.*



DO *Integrate service and loading areas into building architecture through using matching or complementing rhythm and pattern of upper floors.*



DON'T *Misalign ground floor to upper floor modulation.*

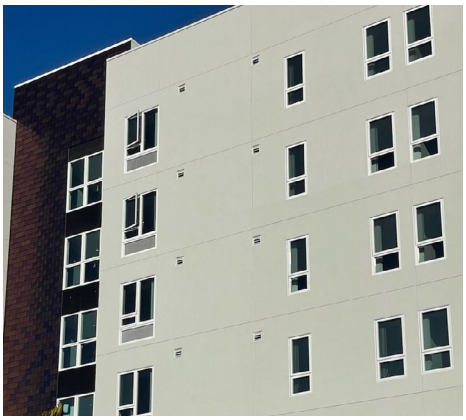
5.2. Wall Vents and Facade Mounted Equipment

A. All vents, flashing, electrical conduits and other facade mounted equipment should match the facade color, or if paired with fenestration elements should match the fenestration color and material.

B. All vents, flashing, electrical conduits and other facade mounted equipment should follow a regular placement rhythm and pattern that complements overall facade design.



DO *All vents, flashing, electrical conduits and other facade mounted equipment should match the facade color.*



DO *Organize vents in a facade to complement other design elements like fenestration and downspouts.*



DON'T *Detract from the building architecture by using contrasting materials or placing vents in a disorganized manner.*

5.3. Mechanical Equipment Screening

A. All mechanical equipment, not including solar equipment, should be screened by an enclosure equal to or greater than the height of the equipment. Screening material should complement the building design.

B. Rooftop elements on multi-family and mixed-use buildings, including roof access, mechanical equipment, and other features needed for the function of the building, should be located to minimize its visual impact by meeting the following requirements.

1. Mechanical equipment less than two feet in height, solar panels, wind generators, or green roof features are exempt from these requirements.
2. Mechanical equipment should be set back a minimum of 10 feet from the roof edge or screened through the use of parapet walls, towers, or other architectural features such that it is not visible from any point at or below the roof level of the subject building.



DO *Setback mechanical equipments on rooftop from the roof edge or screened through the use of parapet walls, towers, or other architectural features.*



DO *Mechanical equipment screening material should complement the building design.*



DON'T *Mechanical equipment screening should not include visual gaps.*

6. VEHICLE ACCESS AND PARKING DESIGN

6.1. Vehicle Access
6.2. Surface Parking
6.3. Structured Parking

6.1. Vehicle Access

INTENT
To increase pedestrian safety and reduce conflicts between vehicles and pedestrians.

A. Drive-thru and drive-in facilities are prohibited downtown.

B. Entrances to parking and loading areas and surface parking should be located on the secondary street with the least active pedestrian frontage. Parking, loading, and utility access should be avoided on the following streets: Esther Street, Columbia Street, Washington Street, Main Street, Broadway Street, 9th Street, 12th Street, and 13th Street.

6.2. Surface Parking

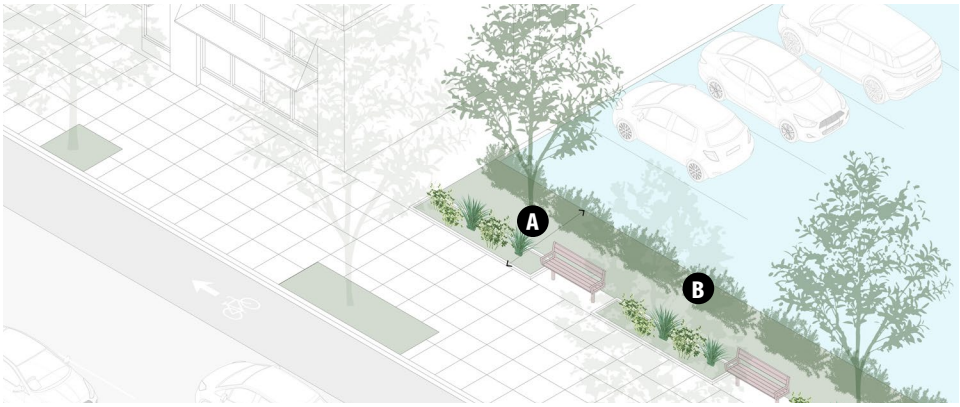
INTENT
To minimize visual impact of parking areas on the public realm and not detract from the overall character of downtown or create inhospitable pedestrian environments.

A. Surface parking should be screened by a landscaped area that includes vertical elements with a minimum height of 3 feet to screen parked cars. The vertical element may be hedges, low walls, trellis, or other plantings.

B. Surface parking should be setback from the property line a minimum 8 feet to provide adequate space for planting.

C. Trees are encouraged in the setback landscape area to increase canopy cover over the sidewalk and parking area. (Figure 17)

Figure 17—Surface Parking Guidelines



A Surface parking should be setback from the property line a minimum 8 feet to provide adequate space for planting.

B Surface parking should be screened by a landscaped area that includes vertical elements with a minimum height of 3 feet.

6.3. Structured Parking

INTENT
To ensure structured parking does not detract from designing ground floors with active uses that engage with the streetscape.

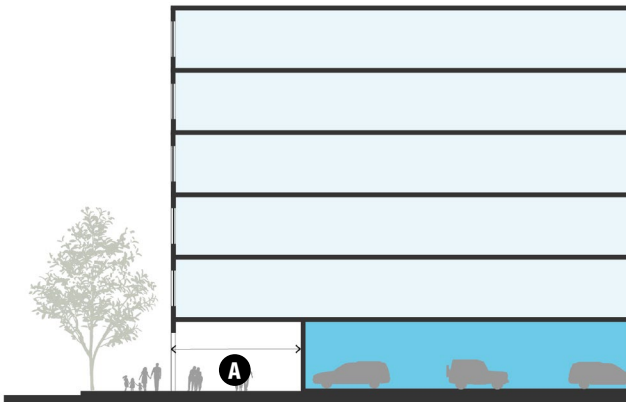
A. Partially sub-grade parking structures:

1. Should not include direct visual access to parking areas. All fenestration into parking areas should be screened with decorative grates, louvers or landscaping.
2. Structured parking should not exceed 6 feet above sidewalk grade for residential buildings and should not exceed approximately 3 feet above sidewalk grade for office buildings. Partially sub-grade parking structures are not appropriate on facades where retail-ready ground floors are required.
3. If structured parking projects 4 feet above sidewalk grade, stoop entries accessing ground floor residential units should be included to partially screen the parking level and provide visual interest and activation of the streetscape.

B. Above-grade parking structures:

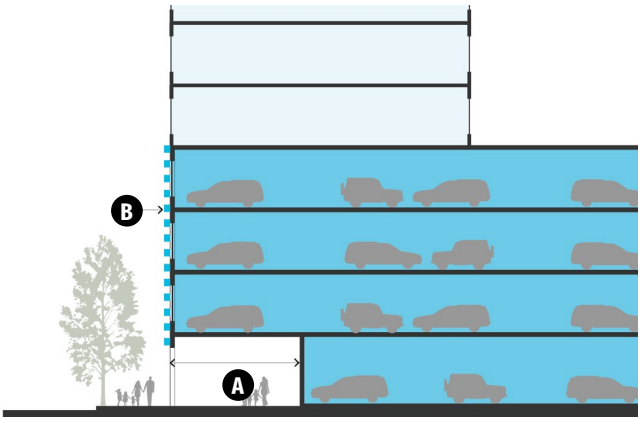
1. Parking areas should be setback a minimum of 25 feet from the building line to provide functional interior space and active frontages. (Figure 18)
2. Structured parking facades should be designed with interest-creating features and active uses.
3. For high-rise structures greater than 120 feet in height, structured parking may come to the facade edge on upper levels. Facades should be designed to look like a non-parking use building or should be designed with artistic design and articulation features to create a unique and interest-creating facade. Upper garage floors should read horizontally on the facade. (Figure 19)
4. Structured parking facades should fully screen all interior and vehicle light trespass.

Figure 18—Above-grade parking structures



A Parking areas should be setback a minimum of 25 feet from the building line to provide space for active uses.

Figure 19—Above-grade parking structures



A Parking areas on the ground floor should be setback a minimum of 25 feet from the building line to provide spaces for active uses.

B Facades should be designed to look like a non-parking use building or should be designed with artistic design and articulation features.



DO *Screen and integrate partially below grade parking structure into the building design.*



DO *Line at-grade parking structure with active uses.*



DON'T *Design structured parking to be visible from public streets.*

7. "MAIN STREET" HERITAGE OVERLAY DISTRICT #2

INTENT
To ensure the preservation of important street frontages representative of downtown Vancouver at an earlier time, to encourage the restoration of the facades of older buildings to their original character, to enhance and expand the economic, cultural, and architectural attraction of the Main Street area through the development of new buildings that build on the historic character of the area.

7.1. Historic Rhythm and Pattern

7.2. Identifiable Base/Middle/Top

7.3. Materials

7.4. Main Street Building Massing and Facade Design

7.1. Historic Rhythm and Pattern

INTENT
To create buildings that complement the historic rhythm and pattern of buildings within the "Main Street" Heritage Overlay District #2.

A. Buildings should have a distinguishable 25-30 feet column pattern.

B. Columns should be expressed from cornice to the street level.

C. Columns should be a minimum 2 feet in width. Taller facades, greater than 4 stories, should have wider columns up to 4 feet in width.

D. Window panes should be recessed a minimum 4-8 inches from the facade plane.

E. Windows should be grouped or articulated with columns or ornamentation that emphasizes a vertical orientation.

F. Windows should be narrow and vertical in emphasis and symmetrically spaced.

G. Windows and door openings should generally occupy less than half of the total wall area of the building frontage.

7.2. Identifiable Base/Middle/Top

INTENT
To ensure new buildings, of any scale, use or style use the base/middle/top design organization to build on the Heritage District's design history and create human-scaled buildings.

The existing older buildings in the "Main Street" Heritage Overlay District #2 are designed to have a defined base, middle, and top.

A. Building facades should be designed to have a base, middle, and top.

1. **Building Base:** Should be designed with a distinct building base that is differentiated from the building middle and top.
   a. May include a ground floor distinguished by one or more of the following: change in material, cornice line, or change in design pattern or fenestration type; or
   b. May include a bulkhead that grounds the building and/or columns of a building and is distinguished from the middle of the building through a change in material.
2. **Building Top:** Should be designed with a distinct building top that is differentiated from the building middle and base.
   a. Should include a defined cornice line or roof overhang; and
   b. May include upper floor change in design pattern or fenestration type.

B. Building alignment: Floor plates and facade features are encouraged to line up with at least one of the adjacent building's base datum line and/or top cornice line.

7.3. Materials

INTENT
To create a consistent character and identity for the "Main Street" Heritage Overlay District #2.

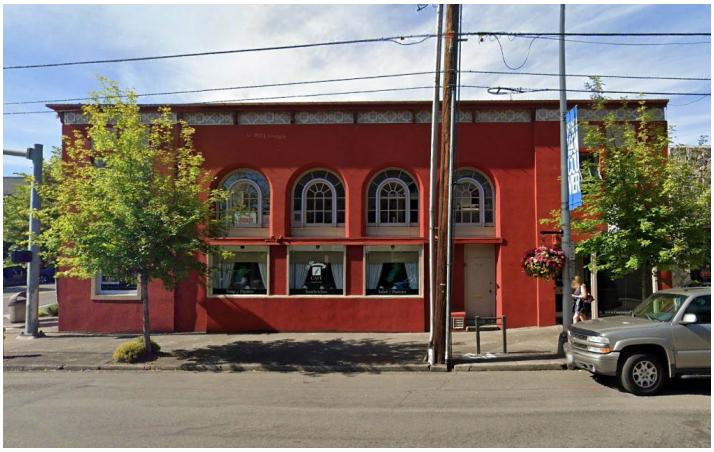
A. Within the area designated as Historic Overlay District #2, brick, brick veneer, terracotta, ceramic tiles, masonry or other durable materials with human-scaled textures or patterns that provide visual interest are encouraged to be the primary façade material for a minimum of the first 2 to 4 floors of the structure.

B. Buildings and accessories should not imitate styles inappropriate to the period exemplified by the key buildings (such as Spanish, Colonial, Federal, Georgian, etc.), which are not characteristic of or compatible with examples of architecture common in Vancouver in the early 1900's.

C. Dark glass or opaque window panes should be avoided in favor of clear or textured glass



Example of a building that complements the historic rhythm and pattern or buildings within the Main Street Heritage District.



Example of a building with well articulated ornamentation, artistic fenestration pattern and cornice.



DO *Use materiality and fenestration pattern that are consistent with the character and identity of the Heritage District.*



DON'T *Stucco should be limited. Materials in the Heritage District should complement existing buildings and reinforce the character of the area.*

7.4. Main Street Building Massing and Facade Design

INTENT

To maintain and emphasize the historic character and scale of buildings.

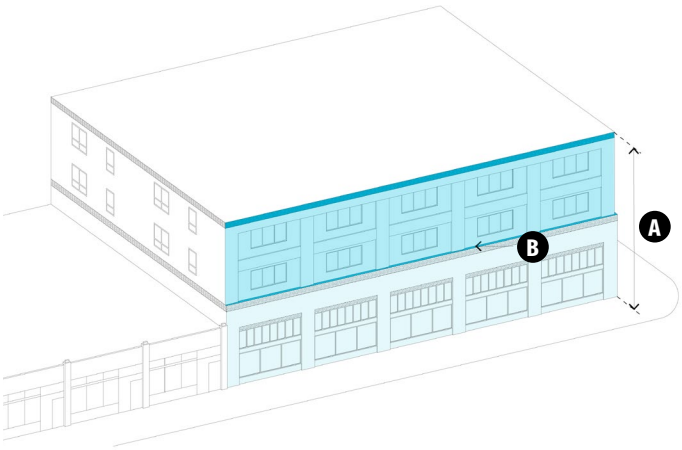
To ensure new buildings do not overwhelm Main Street historic structures.

A. Building Massing on Main Street. Buildings facing or within 100 feet of Main Street should step back upper floor facades above 35 feet in height. The upper floor step back should be greater than 10 feet. (Figure 21)

B. Alterations and Additions.

1. Projects that maintain the original facades of existing buildings but do not exceed 35 feet in height should step back new facades a minimum of six inches from the face of the original facade. (Figure 20)
2. If possible, the original distinguishing qualities and character of a building, especially of its street facade, should be retained. Whenever possible, care should be taken to avoid altering or removing any historic material or significant architectural features such as cornices, display windows, recessed entries, original siding materials, or other features.
3. Contemporary designs for new alterations or additions to the existing buildings should not destroy the significant architectural and historical material present on those buildings. Such designs must be compatible with the size, color, material and character of the building and the conservation district as a whole.
4. Whenever possible, new additions or alterations to a building should be designed in such a way that if they are removed in the future, the essential form and integrity of the original building would remain unimpaired.
5. Stylistic features or examples of skilled craftsmanship that characterize the building should be treated with great sensitivity.
6. Architectural features that have deteriorated should be repaired rather than replaced whenever possible. Repair or replacement of missing architectural features on historic buildings should be based on physical or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings.

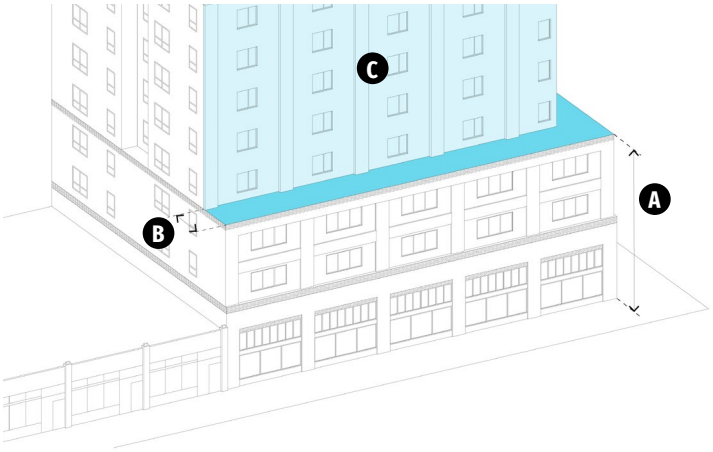
Figure 20—Alterations and Additions to Heritage structures



A Second story or 35 feet in height.

B Projects that maintain the original facades of existing buildings should step back new facades a minimum of six inches from the face of the original facade.

Figure 21—Building Massing on Main Street



A Building base, up to 35 feet in height.

B The upper floor step back should be greater than 10 feet.

C Upper stories, above 35 feet in height.



Example of the use of cornice lines at the base and top of the building to define the three portions of the facade.



Example of defining the building base with different materials and fenestration details than used on the upper stories.

PART III: **APPENDIX**

VDDG Checklist

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	

1. Building + Design

1.1. Massing & Articulation

1.1.1. Block Scale

Y	N	N/A	
☐	☐	☐	

1.1.2. Facade Design

1.1.2.A. Modulations.

Y	N	N/A	
☐	☐	☐	

1.1.2.B. Modulation Design

Y	N	N/A	
☐	☐	☐	

1.1.2.C. Modulation Size

Y	N	N/A	
☐	☐	☐	

1.1.2.D. Modulation Exemption.

Y	N	N/A	
☐	☐	☐	

1.1.2.E. Blank Walls.

Y	N	N/A	
☐	☐	☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
1.2. High-rise Massing			
1.2.1. Meeting the Public Realm			
Y ☐	N ☐	N/A ☐	
1.2.2. Skyline Massing and Design			
Y ☐	N ☐	N/A ☐	
1.3. Fenestration			
1.3.1. Window Design			
Y ☐	N ☐	N/A ☐	
1.3.2. Glass Curtain Walls			
Y ☐	N ☐	N/A ☐	
1.3.3. Bird Safe Design			
Y ☐	N ☐	N/A ☐	
1.4. Roofscapes + Green Roofs			
1.4.1. Roofscapes			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
1.4.2. Green Roofs			
Y ☐	N ☐	N/A ☐	
1.5. Materials			
1.5. Materials (A-C)			
Y ☐	N ☐	N/A ☐	
2. Active Ground Floor Design			
2.1. Building Entrances			
A. Primary Building Entrances.			
Y ☐	N ☐	N/A ☐	
B. Entry/Lobby Design			
Y ☐	N ☐	N/A ☐	
2.2. Retail/Commercial Ground Floors			
2.2.A. Retail-ready Ground Floors.			
Y ☐	N ☐	N/A ☐	
2.2.B. Minimum floor-to-floor height.			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
2.2.C. Storefront Facade.			
Y ☐	N ☐	N/A ☐	
2.3. Office/Professional Services			
2.3.A. Floor-to-floor height.			
Y ☐	N ☐	N/A ☐	
2.3.B. Non-communal spaces			
Y ☐	N ☐	N/A ☐	
2.3.C. Setback.			
Y ☐	N ☐	N/A ☐	
2.3.D. Landscaping.			
Y ☐	N ☐	N/A ☐	
2.3.E. Fenestration.			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
2.4. Live/Work			
2.4.A. Floor-to-floor height.			
Y ☐	N ☐	N/A ☐	
2.4.B. Fenestration.			
Y ☐	N ☐	N/A ☐	
2.5. Residential			
2.5.1. Residential Units			
2.5.1.A. Minimum raised ground floor height			
Y ☐	N ☐	N/A ☐	
2.5.1.B. Minimum floor to floor height			
Y ☐	N ☐	N/A ☐	
2.5.1.C. Stoop entries			
Y ☐	N ☐	N/A ☐	
2.5.1.D. North of 15th Street			
2.5.1.D.1. Minimum Setback			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
2.5.1.D.2. Ground floor entrance setback			
Y ☐	N ☐	N/A ☐	
2.5.1.E. South of 15th Street			
2.5.1.E.1. Ground floor unit raised height (with setback)			
Y ☐	N ☐	N/A ☐	
2.5.1.E.2. Ground floor unit raised height (without setback)			
Y ☐	N ☐	N/A ☐	
2.5.1.E.3. Balcony spaces			
Y ☐	N ☐	N/A ☐	
2.5.2. Residential Accessory Spaces			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
2.6. Rain/Weather Protection			
2.6.1. Locations			
Y ☐	N ☐	N/A ☐	
2.6.2. Primary Building Entrances			
Y ☐	N ☐	N/A ☐	
2.6.3. Retail Frontages			
Y ☐	N ☐	N/A ☐	
2.6.4. Ground Floor Residential and Office Entrances			
Y ☐	N ☐	N/A ☐	
2.6.5. Materials			
Y ☐	N ☐	N/A ☐	
3. Lighting			
3.1. Building + Site Lighting			
3.1.A. Pedestrian-Oriented Lighting			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
3.1.B. Architectural Compatibility			
Y ☐	N ☐	N/A ☐	
3.1.C. Attachment			
Y ☐	N ☐	N/A ☐	
3.1.D. Rooftop			
Y ☐	N ☐	N/A ☐	
3.2. Dark Sky			
3.2.A. Lighting Plan			
Y ☐	N ☐	N/A ☐	
3.2.B. Light Trespass			
Y ☐	N ☐	N/A ☐	
3.2.C. Lighting Intensity			
Y ☐	N ☐	N/A ☐	
3.2.D. Time			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
3.2.E. Color/Temperature			
Y ☐	N ☐	N/A ☐	
3.3. Skyline and Beacon Lighting			
Y ☐	N ☐	N/A ☐	

4. Signage

4.1. General			
Y ☐	N ☐	N/A ☐	
4.2. Retail Signage			
Y ☐	N ☐	N/A ☐	

5. Mechanical Equipment, Utilities, and Service Areas

5.1. Ground Floor Facades			
Y ☐	N ☐	N/A ☐	
5.2. Wall Vents and Facade Mounted Equipment			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
5.3. Mechanical Equipment Screening			
Y ☐	N ☐	N/A ☐	

6. Vehicle Access and Parking Design

6.1. Vehicle Access

Y	N	N/A	
☐	☐	☐	

6.2. Surface Parking

6.2.A. Landscape Screening

Y	N	N/A	
☐	☐	☐	

6.2.B. Minimum Setback

Y	N	N/A	
☐	☐	☐	

6.3. Structured Parking

6.3.A. Partially sub-grade parking structures

6.3.A.1. Parking Structure Fenestration

Y	N	N/A	
☐	☐	☐	

6.3.A.2. Structured parking height above sidewalk grade

Y	N	N/A	
☐	☐	☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
6.3.A.3. Stoop Entries			
Y ☐	N ☐	N/A ☐	
6.3.B. Above-grade parking structures			
6.3.B.1. Minimum Setback			
Y ☐	N ☐	N/A ☐	
6.3.B.2. Interest-creating features and active uses			
Y ☐	N ☐	N/A ☐	
6.3.B.3. High-rise structured parking			
Y ☐	N ☐	N/A ☐	
6.3.B.4. Structured parking façade			
Y ☐	N ☐	N/A ☐	
7. "Main Street" Heritage Overlay District #2			
7.1. Historic Rhythm and Pattern			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
7.2. Identifiable Base/Middle/Top			
Y ☐	N ☐	N/A ☐	
7.2.A. Building Facades			
Y ☐	N ☐	N/A ☐	
7.2.A.1. Building Base			
Y ☐	N ☐	N/A ☐	
7.2.A.2. Building Top			
Y ☐	N ☐	N/A ☐	
7.2.B. Building Alignment			
Y ☐	N ☐	N/A ☐	
7.3. Materials			
Y ☐	N ☐	N/A ☐	

VANCOUVER DOWNTOWN DESIGN GUIDELINES CHECKLIST			
Applicant Information			**Project Name :** **Project Number :** **Date:**
Meets Guidelines			**Applicant Response**
YES	**NO**	**N/A**	
7.4. Main Street Building Massing and Facade Design			
Y ☐	N ☐	N/A ☐	
7.4.A. Building Massing on Main Street			
Y ☐	N ☐	N/A ☐	
7.4.B. Alterations and Additions			
Y ☐	N ☐	N/A ☐	

Comprehensive Plan Update – Comments Received from April 1, 2026 to May 22, 2026 12:00pm

There are a total of 61 comments below. The first table has Comments received since they were last shared with Council (Friday, May 8, 2026 to Friday, May 22, 202612:00p). The second table is a copy of the Comments that were previously shared with Council (Wednesday, April 1, 2026 to Thursday, May 7, 2026), in advance of the May 11 City Council meeting. Earlier comments (before April 1, 2026) were incorporated into the process through engagement and outreach summaries, which are a part of the Our Vancouver 2026-2045 Comprehensive Plan appendix.

Comments received since they were last shared with Council (Friday, May 8, 2026 to Friday, May 22, 202612:00p)

There are 20 comments below, most of which (18 comments) were also shared with City Council through 5/11/2026 or 6/1/2026 public testimony (see Notes column).

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Staff	5/11/2026	Nelson Holmberg	Building Industry Association of Clark County	Happy Monday. Hope you had a fantastic weekend. I wanted to share with you the letter we submitted to City Council for tonight's consent agenda item regarding comp plan zoning map, etc., so you're not surprised by it. I apologize that I didn't share it with you Friday when I sent it to council, but it took me until this morning to find your city email address. I believe that you and Ian have had some conversations about these recommendations previously, so hopefully none of it will come as a big surprise. Please let me know if you have any questions. Thank you! Nelson City of Vancouver City Council RE: Comment Letter – Proposed Residential Lot Standards & Code Amendments Dear Mayor and Councilmembers, Thank you for the opportunity to review and provide feedback on the proposed residential code updates ahead of your consent agenda decision on Monday night. We appreciate the City's efforts to address housing supply and improve attainable housing options. After reviewing the proposed standards, we believe the framework is generally workable with a few targeted modifications. Without these adjustments, however, we are concerned the code may unintentionally limit feasibility, delay development timelines, and ultimately constrain housing supply — working against the City's stated goals of affordability and increased production. **Key Concern: Lot Width & Depth Constraints** We have identified a significant unintended consequence related to the proposed maximum lot width and depth standards for single-family residential development. As currently drafted, these standards appear to assume idealized, square parent parcels (e.g., 100' x 100') and do not adequately account for real-world conditions such as irregular lot shapes, existing parcel dimensions, or site constraints. **Examples of Constraints**	Included in 5/11 CC testimony

				• An existing 80’ x 120’ parcel split into two 40’ x 120’ lots would exceed the maximum depth standard, despite meeting overall lot size requirements. This would prevent otherwise feasible infill development. • A 90’ x 120’ (10,800 SF) parcel cannot be practically divided into two compliant lots due to both depth and size limitations. While a three-lot configuration may technically be possible, it is often impractical due to: • Access challenges (e.g., need for flag lots), • Increased infrastructure requirements, and • The cost of a short plat which may make the project financially infeasible. • Irregularly shaped parcels (e.g., triangular lots) may require more than 5,000 SF to achieve an equivalent buildable area, yet the current code does not appear to provide flexibility for these conditions. **Additional Site Constraint Considerations** We also request clarification and potential expansion of exceptions related to site constraints: • Existing trees, steep slopes, and flag lot access areas may reduce usable lot area below 5,000 SF, even if the gross lot size meets requirements. • While similar considerations are often accounted for in density calculations, they do not appear to be consistently applied to maximum lot size standards. **Recommendations** To ensure the code achieves its intended outcomes while maintaining practical feasibility, we respectfully recommend the following modifications: <u>Increase Maximum Lot Dimensions:</u> Adjust maximum lot width and depth to provide flexibility for a broader range of parcel geometries. We suggest: • Maximum width: 75 feet • Maximum depth: 145 feet This would better accommodate configurations such as 75’ x 65’ or 35’ x 145’, which can support middle housing while remaining aligned with overall lot size goals. <u>Allow Exceptions for Irregular Lots:</u> • Incorporate clear provisions allowing deviations from maximum lot size and dimension standards where necessary to accommodate irregularly shaped parcels or achieve equivalent buildable area. <u>Exclude Constrained Areas from Lot Size Calculations:</u> • Similar to density calculation methodologies, exclude critical areas, flag stems, and other non-buildable site constraints from maximum lot size calculations. <u>Exempt Two-Lot Divisions from Maximum Standards:</u> • Allow flexibility for two-lot divisions under the new lot split provisions. Small-scale divisions are often the most economically viable form of incremental housing development. Applying full dimensional constraints may prevent these opportunities altogether. <u>Apply Consistency Across Housing Types:</u> • Evaluate whether similar adjustments are needed in other residential zoning categories (e.g., townhouse and middle housing standards) to ensure consistency and avoid unintended barriers.	

				We support the City's efforts to expand housing options and improve affordability. The recommended refinements are intended to ensure that well-intentioned regulations do not inadvertently limit development feasibility or reduce the effectiveness of the code in achieving its housing goals. We welcome the opportunity to discuss these recommendations further and work collaboratively toward solutions that balance regulatory clarity with real-world development conditions. Thank you for your consideration. Sincerely, Nelson Holmberg Government Affairs & Workforce Development Manager, Building Industry Association of Clark County	
Email Staff	5/8/2026	Eric Golemo	SGA Engineering	What is the status of this code? Perhaps we can meet to discuss and go over some specific examples and sketch things out. It is hard to express these items in email. We really appreciate the communication and outreach thus far. We understand the goal to prioritize density. While it may not be the preferred approach with BIA and CCAR membership, we feel we could work this the proposed code with a few minor changes recommended below. The suggestions we made are reasonable and come from stress testing the proposed code with real world examples. If they are not added, we are concerned the anticipated development will not be practical or will not happen in a timely manner. This would not solve the supply issue, and housing will get more expensive and less attainable. I think there may be concerns, that with these changes, the city will not hit their density targets (on paper) and the assumptions used in the comp plan will not match. But I would propose you do not change the comp plan assumptions for this cycle they can be considered an average or a target in the assumptions. It is too far along in the process to change them now. Instead, we can monitor and adjust in the future, as necessary. Thanks again for the effort and consideration. Eric [previous emails since 4/1/2026 below] **[From Eric G., 4/20/2026:]** Thanks for the response. I made a few follow up comments below in red. Perhaps we can meet to discuss and go over some specific examples and sketch things out. It is hard to express these items in email. We really appreciate the communication and outreach thus far. We understand the goal to prioritize density. While it may not be the preferred approach with BIA and CCAR membership, we feel we could work this the proposed code with a few minor changes recommended below. The suggestions we made are reasonable and come from stress testing the proposed code with real world examples. If they are not added, we are concerned the anticipated development will not be practical or will not happen in a timely manner. This would not solve the supply issue and housing will get more expensive and less attainable. I think there may be concerns, that with these changes, the city will not hit their density targets (on paper) and the assumptions used in the comp plan will not match. But I would propose you do not change the comp plan assumptions for this cycle they can be considered an average or a target in the assumptions for now. It is too far along in the process to change them now. Instead, we can monitor and adjust in the future, as necessary. Thanks again for the effort and consideration. Eric **[From staff, 4/8/2026:]** Thanks for sending these comments and for your participation in the Comp Plan and code update process. Most recent draft of the new code is here. Please see below for responses to your comments. Happy to jump on a call to discuss if helpful.	Staff replied 5/11/2026

				1. **Adjustments to minimum density in the MX and RA Districts**: We have discussed at length and believe the current minimum densities are appropriate. There are limited areas of MX and RA zoning in the preferred alternative, and these are areas where we want to see higher densities to support housing production and leverage significant public investments in nearby infrastructure (i.e., transit). In contrast, there is significant Medium Scale Neighborhood (MS) zoning across the City, which allows for density at or above 16 units per acre. We understand that lower density development is going to be more feasible in the short term, and believe that there are many opportunities for development with this density profile in the MS district. I know this may mean that specific building types may not work in the MS and RA, but the general consensus is that other building types will be feasible, and that we need to drive toward these denser development types in MX and RA areas to meet our production goals. We also allow density averaging across a site, so there is flexibility to mix building types on a site to meet the market while still hitting the minimum density requirements. From review of the plan, it looks like a significant about of Medium scale neighborhoods are being changes to MX and RA. Some notable areas are uptown village, Fourth Plain, and Mill Plain. These unconventionally high minimum densities (32 and 64) units per acre may inadvertently prohibit the exact type of development you are trying to promote. Some examples include the vacant BIA Site and the Provision site at 1911 Broadway. In general, we support removing maximum density limits. Project economics already incentivize higher density where it is practical and cost-effective. The market will naturally drive this. However, minimum densities that are set too high may unintentionally stifle redevelopment and limit opportunities to increase housing supply. The anticipated development will not be practical or will not happen in a timely manner. This would not solve the supply issue and housing will get more expensive and less attainable. 2. **Waiving minimum density requirements for parcels under 0.5 acres**: We have discussed at length and believe the current minimums should apply to all lots in the specific zoning district. Public infrastructure and critical root zone are excluded from density calculations in the code, and the density table allows flexibility for units with more bedrooms. Economy of scale and geometrical/dimensional constraints can be limiting on smaller parcels. Parcels under 0.5 acres are particularly challenging, and in many cases, it is not practical to redevelop to achieve the proposed densities. Financing for small, high-density multifamily projects is also difficult to obtain. In these situations, the highest and best use may be splitting into a couple lots, adding ADUs, or building a multiplex housing project. While those do add needed density and housing, they may not meet the minimum densities or dimensions. The code needs to be more flexible on smaller sites. 3. **Revise private road standards to allow for smaller, more flexible development**: Following the Comp Plan, we will be starting a Middle Housing / Small lot production strategy that will look at non-Title 20 barriers to infill and middle housing production, including transportation and fire requirements, among others, as well as incentives for homeownership and other outcomes that are hard for the market to deliver. We will continue to involve you and the BIA in this process. I know this means that the code may not work perfectly for really small or oddly configured lots at the outset, but we will continue to refine it. Thanks. This will need to be a priority and Road mods will need to be granted in the interim. The type of development being incentivized will not be practical without revising the private road standards to allow for smaller, more flexible sections that better support these outcomes. 4. **Exclude private roads from density calculations**: Private Road easements are excluded from minimum density calculations in the existing and draft code. What about internal circulation drives (like apartment lot drive aisles)? They should be excluded from density calculations as well. They are basically private roads in function and should be treated the same in the density calculations. 5. **Increase minimum lot widths and depths to provide for detached SFR and townhomes**: We have discussed internally and believe the current standards are appropriate. The variance process provides some flexibility, and we will continue to review how the new code is working and make updates as needed.	

				This one seems really reasonable. The proposed standards do not account for geometrical constraints or irregular lots. We should increase the Maximum Lot Widths and Depths to provide more flexibility and accommodate geometrical constraints. I provided some examples in the previous emails below. Perhaps set them at a Width of 75' and depth of 145' (that allows possible lots 75'x65' and 35'x145') that could accommodate middle housing products and still meet the 5000 SF lot size target. 6. **Provide exceptions to maximum lot sizes to provide flexibility**: Lots existing at the time of code adoption will not be subject to maximum lot width and depth standards, only density minimums. The proposed standards do not account for new divisions on geometrically constrained or irregular shaped lots. There are cases where a new proposed lot may be irregular shaped (maybe triangular) and would have to exceed 5000 sf to make it equivalent to the buildable area of a rectangular 5000 SF lot. The code doesn't appear to accommodate those situations. 7. **Exclude critical areas, flag stems and other site constraints from maximum lot sizes**: The draft allows the exclusion of private streets, public facilities, critical root zones, critical areas, BPA easements, water detention/retentions ponds and parks/public facilities to be excluded from maximum lot sizes. What about flag stems? 8. **Exclude 2-lot short plats from maximum lot size provisions**: The draft allows for an administrative lot split, these lot splits are not subject to maximum lot sizes. Ok. This will be helpful. But it was not immediately clear that 2 lot divisions would be exempt from the maximum lot sizes. I assume they would also be exempt from the maximum dimensional standards. As you know, minimum densities and maximum lot sizes are an important tool in driving more dense development and meeting our housing production goals, particularly given the amount of flexibility built into the new code. We believe we have landed in the best spot we can at this time given all the feedback we have received, but I also recognize that the code will not work perfectly at the outset and we will need to adjust it over time. We are committed to efficient updates as people start to use the new code, and if the issues you are flagging prove to be barriers, we will address them quickly. Thanks. From the stress testing these items have already been identified as barriers. We are just trying to get ahead of them. Thanks again for your engagement and support of this process. I know we haven't made all the changes you have asked for, but I hope you feel like we have incorporated much of the feedback you and others in the development community have provided and overall created a balanced and flexible code, which of course will be refined over time. Best, **[From Eric G., 4/1/2026:]** Mark and Rebecca, Just checking back in this? What are the next steps? We feel we could work this the proposed code with a few minor changes recommended below. If they are not added, we are concerned the anticipated development will not be practical or will not happen in a timely manner. This would not solve the supply issue and housing will get more expensive and less attainable. In addition to the items below, we identified an additional unintended consequence in the single-family Residential lot standards. The Maximum lot width and depth may be too restrictive and may prevent some sites from being able to subdivide. It assumes a perfect 100'x100' parent parcel and doesn't account for geometrical constraints or irregular lots. For example, if there was an existing lot that was 80' wide and 120' deep that wanted to divide in half utilizing the lot split code to two 40'x120', it would not meet code. It would exceed the 120' max depth even if it met the 5000sf max. So instead, it would likely remain as-is and prevent it from accommodating additional housing to meet the density goals. A similar example can be used if the parent	

				parcel is 90'x120'and about 10,800 SF. In that example, it also could not be split in half because it slightly exceeds the lot area in addition to the depth. I suppose you would say that it could be split in 3. But there may be multiple reasons why this is not practical. First, it would not meet the depth requirements without having a flag lot that wouldn't have access without significantly encumbering the other lots. Secondly, the cost of a short plat would make the division uneconomically feasible. Utilizing the new lot split bill is the only likely way to make this small-scale division cost effective. There are also cases where a lot may be irregular shaped (maybe triangular) and would have to exceed 5000 sf to make it equivalent to the buildable area of a rectangular 5000 SF lot. The code doesn't appear to accommodate those situations. Also, is there an exception to the 5000 sf lot size for other site constraints. For example, a tree that needs to be retained, steep slopes, or a flag stem. In these cases, there may be a larger lot that has less than 5000 sf of usable space. I know there are exceptions in the density calculations, but they may also need to apply to the maximum lot size. **We recommend the following adjustments to the Single-Family (and Townhouse) Residential Code:** • **Increase the Maximum Lot Widths and Depths to provide more flexibility and accommodate geometrical constraints Perhaps set them at a Width of 75' and depth of 145' (that allows possible lots 75'x65' and 35'x145') that could accommodate middle housing products and still meet the 5000 SF lot size target.** • **Exceptions to the Maximum lot sizes need to be added to provide more flexibility and accommodate geometrical constraints on irregular shaped lots.** • **Critical areas, flag stems, and other site constraints should not be included in the Maximum lot size similar to the exceptions in the density calculations.** • **Exclude 2 lot divisions from the Maximum lot sizes and depths. Small short plats are not usually economically feasible. Something is better than nothing and it allows for an existing home to be split off utilizing the new lot split code and then the larger vacant portion could then be further divided to provide additional housing.** • **Similar changes may also need to be made to the standards in other housing type sections.** I would be happy to meet to go over these in detail and explain specific examples. It is very difficult to describe in text alone. Sincerely, Eric	
Email City Council	5/10/2026	Matthew B.		City Council, My name is Matthew [last name] and I am a resident of Vancouver, WA. I am writing today to express my support for the city council to adopt the Comprehensive Plan AS IS. The plan is well designed to build the future of our city and would not benefit from additional changes. -Matthew	Included in 5/11 CC testimony

Email City Council	5/10/2026	Miriam H		Dear Honorable Council Members: I am writing to you today to ask that you adopt the Comprehensive Plan without any changes. I understand that there are some in our city who are expressing "Not In My Backyard" sentiments regarding the plan. I believe any short-term pain will be more than offset by long-term gains in accessibility, livability, employability, productivity, and affordability. I ask you not to throw away months and years of planning and effort by changing what has screened out as the best path forward for our City. Thank you for your consideration. Sincerely,	Included in 5/11 CC testimony
Email City Council	5/10/2026	Jordan F		Dear Councilors, As a resident of Lincoln, I'd like to voice my support for the comprehensive plan as is. Thank you,	Included in 5/11 CC testimony
Email City Council	5/10/2026	Mike T		Hi! This is Mike [last name], and I live in Hough. I can't make any public comments so hoping this helps: **I'm writing to encourage you all to pass the preferred alternative of the comp plan "as is."** Hope you all are enjoying this beautiful weather. Thank you and have a great one! Mike	Included in 5/11 CC testimony
Email City Council	5/10/2026	Katelyn S		Hello, My name is Katelyn [last name] and I am a resident of Vancouver in the 98661 area code. I am writing to express my support and urge adoption of the Comprehensive Plan as is. Livable, affordable cities should be a human right, and any concessions made now will only bring problems back on the near horizon. Now is the time for action of the utmost of our abilities. We deserve a safe, accessible, enjoyable place to call home. Thank you for your time, Katelyn	Included in 5/11 CC testimony

Email City Council	5/10/2026	James W		Hello, I'm writing in support of the Comprehensive Plan as is. Upzoning in general improves cities in every measurable way. People who are against upzoning are afraid, but in many cases the opposition dies down as they see their cities get improved due to upzoning and/or other city improvement projects. It's always difficult to make the unpopular, but correct decisions, but they need to be made anyway for the good of the people. James W	Included in 5/11 CC testimony
Email City Council	5/10/2026	Jan V		No surprises from me: Please approve the ordinance adopting the Comp Plan. A wise woman (you know who you are) once told me "Change is hard." Yeah, yeah... I thought. But I had NO IDEA. Now I do and watch our city carefully approach all changes. Thank you for recognizing that having knowledge of the right thing to do isn't the same as just doing the right thing. It's definitely a process, not an event as my friend in AA tells me. Because you folks at the city are so careful about process, we WILL eventually do what we must to meet our housing, climate, etc. goals. Thank you, Jan V	Included in 5/11 CC testimony
Email City Council	5/10/2026	Justin		To all of our wonderful city council members I'm writing to voice my support of the comprehensive plan as is I hope we make smarter choices for the future of the city unlike the counties shortsighted move on growth management and housing densities	Included in 5/11 CC testimony
Email City Council	5/11/2026	Jason C		Hi all, I write this to you as I am sitting in a public square in Haarlem, the Netherlands. If you haven’t been, it is a beautiful, dense city of walking, bicycling, canals, cafes, and lovely trees. This city is what I see Vancouver becoming one day, and it is only possible through code changes like the ones introduced by the Comprehensive Plan. Please adopt the plan as-is, and let the city grow into something that supports people’s quality of life, and the quality of living of those coming here in the future.	Included in 5/11 CC testimony

				 Best, Jason	
Email City Council	5/11/2026	Dev		Hello City Council Members, I ask of you to adopt the staff's Comprehensive Plan as they've presented it to you. Our housing costs have exploded, our streets are not safe for transportation, and we desperately need to redesign how we define "living", away from the seas of concrete and asphalt, and more towards greenery, mixed housing, and third places that are a short walk or bike ride away. Adopt the Comprehensive Plan as is. Vancouver needs this. Dev	Included in 5/11 CC testimony

Email City Council	5/11/2026	Eric P		To the city council, I strongly urge the council to support the comprehensive plan as is without any alterations. Thank you, Eric Hudson Bay Vancouver	Included in 5/11 CC testimony
Email City Council	5/11/2026	Ben M	President, Northwest Neighborhood Association	To the Vancouver City Council: At the April 30, 2026, meeting of the Northwest Neighborhood Association, members voted in favor of two resolutions regarding the City of Vancouver's Comprehensive Plan update: · Approved by a vote of 19 in favor to 17 opposed, the Northwest Neighborhood requests that the City of Vancouver continues its comprehensive plan process to allow more time for further education about the plan update and to encourage additional feedback. · Approved by a vote of 38 in favor to 1 opposed, the Northwest Neighborhood requests that City of Vancouver place the Northwest Neighborhood entirely within the Low Scale Neighborhood designation The Northwest Neighborhood recognizes that all neighborhoods in Vancouver will play a role in addressing the City's housing shortage. We embrace the desire to increase diversity, growth and responsible densification to meet the City's current housing challenges. What we oppose in the City's proposed update, is the scale of these changes through the overuse of the Medium Scale designation in long-established neighborhoods, particularly its application to much of the Northwest Neighborhood. We express the following concerns regarding the application of Medium Scale to the Northwest Neighborhood while requesting that the entirety of the neighborhood be zoned as Low Scale: · Allowing for 75-foot, maximum infill development in a long-established neighborhood will create a significant strain on local infrastructure, streets and multi-modal transit as well as increased demand for utilities and emergency services. · There will be significant negative safety impacts through the increase of multi-modal traffic on narrow streets that do not have sufficient space to safely allow for parking, pedestrian and cycling usage and increased vehicular traffic. · Maximum infill development will have a negative environmental impact on vital green spaces as well as restricting the ability of people and wildlife to access those spaces. · Promoting maximum infill at the Medium Scale designation creates competition between first-time home buyers and large, wealthy developers, forcing potential homebuyers to rent and limiting upward mobility. · The City claims that the impact of such projects will either be minimal or "incremental" but has no way of ensuring this outcome. · By placing maximum infill developed within long-established neighborhoods, significant economic pressure and strain will be placed on those living near intensely developed locations. The City acknowledges the necessity to evaluate the comprehensive plan, its impact, and how it meets the needs of the residents of Vancouver on an ongoing basis. We encourage this evaluation to be done before committing to maximum infill development and causing irreversible damage. The Northwest Neighborhood Association hopes that the City will be open to updating and implementing the comprehensive plan through a balanced approach that will mitigate potential negative impacts for its residents. We remain ready to be an active partner with the City in efforts to encourage positive outcomes through responsible growth and encouraging effective housing solutions and a greater variety of housing types. Thank you for your time and your consideration. Sincerely, Benjamin [last name] President Northwest Neighborhood Association	Included in 5/11 CC testimony

Email City Council	5/11/2026 (after noon 5/11 CC cutoff)	Mike Y		Dear City Council, I am writing to request that the Comprehensive Plan remains as is, without further modifications. Thank you for your time. Mike [last name]	Included in 6/1 CC testimony
Email City Council	5/11/2026 (after noon 5/11 CC cutoff)	Demi Y		Dear City Council, I am writing to express support for the Comprehensive Plan to remain as is. Thank you, Demi [last name]	Included in 6/1 CC testimony
Email City Council	5/11/2026 (after noon 5/11 CC cutoff)	Parker G		Hello, my name is Parker Graham and I am writing as a Vancouver resident, in support of the comprehensive plan being adopted as is so that our city can grow with the increasing demand and occupancy.	Included in 6/1 CC testimony
Email City Council	5/11/2026 (after noon 5/11 CC cutoff)	Paul S		Hi City of Vancouver Councilors, I am writing to express my interest in the city adopting the Comprehensive Plan as is. I have lived in Vancouver about 14 years now, I serve on the Clark County BPAC group and am very happy with the direction the city is moving to build out facilities (i.e., infrastructure) for mass transit and active transportation (cycling, scooting, walking). Thank you Paul	Included in 6/1 CC testimony

Email City Council	5/14/2026	Amanda C		Hello, Vancouver City Council, My name is Amanda [last name], and I am writing to you today to urge you to adopt the 2026-2045 Comprehensive Plan **as-is**. For many years, I lived in the Seattle area where I was transitioning to relying exclusively on my bicycle for transportation (despite it being another very car-centric city), and when I moved to Vancouver in 2020, I was impressed by the city's commitment to expanding multi-modal transit. At that time, the Columbia Street bike corridor was under construction, and when it was finished, I used it regularly to bike from my home in the northwest neighborhood to downtown. Now, I'm in east Vancouver, and I take advantage of the newly-finished and improved Fourth Plain to get into downtown. The Fourth Plain project is example of the city doing right by cyclists and those who rely on public transit. However, much of my life is not oriented towards downtown; I work at the Humane Society for Southwest Washington, on 192nd Street - a street without bike lanes or sidewalks, one of the most dangerous stretches of road for cyclists in the county. But without a car and insufficient transit, I take the risk. I urge you to support the 192nd Street Improvement Plan, and, looking further into the future, the 2026-2045 Comprehensive Plan **as-is** to make the city safe for all, not just motorists. Thank you, Amanda [last name]	Included in 6/1 CC testimony
Email Staff	5/12/2026	Ben M		Thank you for addressing questions on medium scale designation at last night's city council meeting. I wanted to follow up on a few items you discussed and seek clarity on them. 1) From your answers and from what I've read in the new code, up to 75-feet and less than 7 units does not require a site plan. Does this mean that a homeowner on an existing lot, if they choose, could take down the existing home and build a 75-foot high single-family dwelling, assuming they do it within the allowable time frame? 2) If a building of more than 7 units is proposed, it would obviously require a site plan, but assuming the requirements are met, is no further environmental impact study required before they would be allowed to construct maximum effective density by right? 3) Furthermore, once this level of construction passes the site plan review and is noticed to the Neighborhood Board (I guess I'm going to have to get really good at making sure I get to inbox zero every day), does it have no avenue of appeal once the site plan is approved because it's included by right in the code? Thank you again for all of your efforts and outreach. Your feedback and willingness to work with folks across the spectrum of viewpoints is much appreciated. -- Ben [last name]	Staff replied on 5/14

Comments that were previously shared with Council (Wednesday, April 1, 2026 to Thursday, May 7, 2026)

There are 41 comments below, some of which were also shared with City Council through 4/27/2026 or 5/11/2026 public testimony (see Notes column). This table was previously shared with City Council on May 7, 2026.

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Staff	4/7/2026	Aaron O.	Public Works Department, City of Vancouver	Good morning, This email is to thank you for your support with our collection system's hydraulic modelling efforts. You and your team provided key support with ESD and Comp Plan population and employment distributions. Our project files document your support and conclude the coordination successful and without incident. Thanks again and good luck with the adopted Comp Plan,	
Email Our Vancouver	4/10/2026	Jean A.		Hello, Your interactive maps are very cool. You've been working hard! Thanjs for the summarized comments, also. I live in an apartment near 136th and MillPlain. My comments are the same as before: 1. The huge increase of red on the map (and the changes I see), probably should be categorized differently. I would not use the term, "neighborhood." The Lexus dealership must surely be more than 50 feet tall. 2. And where is the color green for "Airport Green." WHY NOT RETAIN THIS AS GREEN SPACE? 3. My neighbor just moved out today, citing too much noise (from136th/138th). 4. We now have a mega In-n-Out Burger. Why such a huge footprint for a burger place? (I see more apartments will be built on 136th Ave, north of MillPlain. The traffic will probably be hugely backed up.) Thank you for inviting comments.	Staff replied 4/13/2026

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Our Vancouver	4/11/2026	Joshua J.		Mr. Young and Mr. Pluckhahn, I am submitting this formal grievance to the City Manager's Office and the City Attorney's Office to establish a public legal record regarding procedural vulnerabilities in the Comprehensive Plan update. A review of the city's outreach methodology reveals structural biases that may violate the "early and continuous public participation" mandates of the Washington State Growth Management Act (RCW 36.70A.140). If left unaddressed, these procedural defects leave the 2045 Plan vulnerable to invalidation by the Growth Management Hearings Board. **1. Institutional Capture and the "Membership Bloc" Conflict** According to the Acknowledgements on Page 3 of the Comprehensive Plan 2nd Draft, the City identifies a select group of "Community Partners" tasked with the "co-creation of the plan with City staff" (p. 13). While the 2nd Draft lists Community Partners as individuals, the City's 2023 PEP confirms this group was "co-convened with the Southwest Washington Equity Coalition (SWEC)." This bloc includes Siobhana McEwen (ED of SWEC), and representatives from publicly listed SWEC member organizations such as Bryan Stebbins (Point North), Dania Otto (Sakura), Eduardo Ramos (Latino Leadership NW). Critically, the City's own Community Development and Housing Departments are active members of this same SWEC Membership Bloc, resulting in City staff co-creating policy with a coalition of which they are a member, effectively lobbying themselves with taxpayer funds and creating a circular conflict of interest. The 2045 Plan will be voted upon by a City Council whose members hold leadership roles within the very organizations that co-created the plan. This includes Councilmember Diana Perez (Founder of SWEC/LULAC), Councilmember Kim Harless (Chair of Fourth Plain Forward), and Councilmember Ty Stober (Board Member, Council for the Homeless). By utilizing a hand-selected group of Partners whose organizations are structurally intertwined with the City and its Council, the City has bypassed the GMA's requirement for independent, broad-based participation. This is not a consensus of the public; it is an echo chamber of the City's own membership bloc. **2. The Conflation of HB 1110 and Urban Mid-Rise Zoning** The City's public engagement strategy has consistently framed the rezoning of Low Density (R-6 and R-9) neighborhoods into Medium Scale Density as a standard compliance measure with Washington State's HB 1110 "missing middle" housing initiative. This framing is factually inaccurate, and has created a procedural lack of informed consent. While HB 1110 mandates a transition away from single-lot exclusivity (allowing 4 to 6 units per lot), it does not mandate the Medium Scale Density uncapped zoning of 75-foot buildings in currently R-6 and R-9 areas. By removing maximum unit caps and providing for 6-story building envelopes, the allowable density jumps from the current 5-8 units per acre to 80-120 Units Per Acre, an up to 2,400% increase. Labeling a 24x density multiplier as "middle housing" and/or compliance with HB 1110 is factually deceptive. City staff have consistently represented to the public that other Tier 1 cities under HB 1110 are adopting similar 6-story mandates for low-density areas. This is demonstrably false. Of the 16 Tier 1 cities in Washington, the vast majority cap their current low-density residential upzoning at 35 feet and 6 units. Tacoma caps at 45 feet. Spokane caps at 40 feet. Vancouver and Seattle stand entirely alone in pushing 6-story, unlimited-unit upzones into formerly low-density areas - however Seattle strictly limits this massive upzoning to an 800-foot radius around Major Transit Stops such as BRT, Light Rail, and Commuter Trains. If a neighborhood only has an hourly bus, Seattle does not apply this zoning. Vancouver's Comp Plan is proposing Medium-Scale zoning for neighborhoods where there are no arterial roadways, thoroughfares, or mass transit, where the local bus runs only once an hour, stops before 7:00 PM, and does not run on weekends. Even under Seattle's urban center rules, our neighborhoods would never qualify for this upzoning. By claiming Vancouver's 75-foot mandate is "standard," the City has deprived residents of the context necessary to provide meaningful comment. Lastly, in regional planning, a 6-story structure is universally classified as High-Density Urban Mid-Rise. By cloaking 75-foot, high-density construction behind the approachable jargon of "Medium Scale," the Comp Plan has obscured the physical reality of this zoning proposal. Participation cannot be considered legally "meaningful" under the GMA if it is based on a false premise, as the public cannot provide meaningful comment on a proposal whose physical scale has been intentionally sanitized. **3. Request for Audit and Legal Review** To ensure the city's public participation process remains legally defensible, equitable, and compliant with the GMA, I am requesting: 1. 2.	

Source	Date	Name	Affiliation (if any)	Content	Notes
				3. **A Conflict Audit** 4. by the City Manager's Office into the entanglement between the Community Development 5. Department, City Council, and the Partner Organizations. 6. 7. 8. 9. **An immediate pause** 10. on the advancement of the "Medium-Scale" overlays on all R6-R9 zoned residential areas until a genuinely independent, infrastructure-based review and accurate, transparent public feedback process is conducted for the residents of these areas. 11. Thank you, Joshua Jones	

<table>
<tr><th>Source</th><th>Date</th><th>Name</th><th>Affiliation (if any)</th><th>Content</th><th>Notes</th></tr>
<tr><td>Email City Council</td><td>4/11/2026</td><td>Joshua J.</td><td></td><td>Councilmembers,
Though I hope to attend Tuesday's City Council Meeting, I am submitting this analysis of the Comprehensive Plan Draft for your review prior to the final drafting of the 2045 Comp Plan. After auditing the spatial application of the "Medium-Scale" (6-story) overlays against established urban planning principles, the city’s state-mandated growth targets, and communications from City Staff, the current Comp Plan demonstrates legal, mathematical, and infrastructural inconsistencies that expose the city to unnecessary risk.
These flaws risk the validity of the current draft's compliance with the Growth Management Act (GMA) and the State Environmental Policy Act (SEPA), and should be addressed prior to the City's/Commission's final recommendation.
1. Procedural Risk: The Conflation of HB 1110 and Urban Mid-Rise Zoning (Medium Scale Density) The City’s public engagement strategy has consistently framed the rezoning of our Low Density (R-6 and R-9) neighborhoods into ‘Medium Scale Density’ as a standard compliance measure with Washington State’s HB 1110 "missing middle" housing initiative.
HB 1110 does mandate a transition away from single-lot exclusivity (allowing 4 to 6 units per lot), however it does not mandate the “Medium Scale Density” uncapped zoning of 6-story buildings in currently R6 and R9 areas. By removing maximum unit caps and providing for 6-story building envelopes, the allowable density jumps from the current 5-8 units per acre to 80 to 120 Units Per Acre. This is an up to 2,400% increase in allowable density.
<table>
<tr><th>City / Zoning Model</th><th>Previous Zoning Baseline (Min. Lot Size)</th><th>Max Height Limit</th><th>Theoretical Density</th><th>Practical Density</th><th>Magnitude of Density Increase</th></tr>
<tr><td>Austin, TX (HOME Initiative)</td><td>SF-3 (5,750 sq. ft.)
~5 to 6 DU/ac</td><td>2 to 3 Stories</td><td>~24 DU/ac</td><td>12 to 18 DU/ac</td><td>Up to 3x Density Increase</td></tr>
<tr><td>Portland, OR (RIP & RIP2)</td><td>R5 (5,000 sq. ft.)
~6 to 7 DU/ac</td><td>3 Stories (35' limit)</td><td>~42 DU/ac</td><td>15 to 25 DU/ac</td><td>Up to 4x Density Increase</td></tr>
<tr><td>Vancouver, WA (2045 Low-Scale)</td><td>R-6 / R-9 (5,000-7,500 sq. ft.)
~5 to 8 DU/ac</td><td>3 Stories</td><td>~35 DU/ac</td><td>15 to 20 DU/ac</td><td>Up to 4x Density Increase</td></tr>
<tr><td>Los Angeles, CA (TOC Tiers 3 & 4)</td><td>R1 (5,000 sq. ft.)
~6 to 7 DU/ac</td><td>5 to 6 Stories</td><td>150+ DU/ac</td><td>70 to 110 DU/ac</td><td>Up to 18x Density Increase</td></tr>
<tr><td>Seattle, WA (Urban Villages - MR)</td><td>SF 5000 (5,000 sq. ft.)
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Framing a 24x density multiplier in 6-story mid-rise developments as standard "middle housing" is factually inaccurate, and the Comp Plan’s decision to label this Zoning as "Medium Scale" is functionally misleading to the general public. In regional planning, a 6-story structure is universally classified as High-Density Urban Mid-Rise. Peer cities are transparent about this scale; Seattle explicitly zones these areas as "Midrise" and Portland labels them "High-Density". By cloaking high-density midrise construction behind the soft,</td><td>Included in 4/13 CC testimony</td></tr>
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				approachable jargon of "Medium Scale," the Comp Plan is actively obscuring the physical reality of this zoning from its residents. This is a fundamental misrepresentation of the draft plan's physical scale, which compromises the legal mandate for "early and continuous public participation" (RCW 36.70A.140). City staff have invoked comparisons to other Tier 1 cities under HB 1110 to justify the aggressive application of 75-foot tall, unlimited-unit zoning in current low density neighborhoods. Of the 16 Tier 1 cities in Washington, the vast majority cap their current low-density residential upzoning at 35 feet and 6 units. Tacoma caps at 45 feet. Spokane caps at 40 feet. Vancouver and Seattle stand entirely alone in pushing 6-story, unlimited-unit upzones into formerly low-density areas.	

Tier 1 City	Max Units Per Lot	Max Height Limit
Auburn	6 units	35 ft (3 stories)
Bellevue	6 units	35 ft (3 stories)
Bellingham	6 units	35 ft (3 stories)
Everett	6 units	35 ft (3 stories)
Federal Way	6 units	35 ft (3 stories)
Kennewick	6 units	35 ft (3 stories)
Kent	6 units	35 ft (3 stories)
Kirkland	6 units	~35 ft (3 stories)
Pasco	6 units	35 ft (3 stories)
Renton	6 units	35 ft (3 stories)
Spokane	Unlimited	40 ft (3 to 4 stories)
Spokane Valley	6 units	35 ft (3 stories)
Tacoma	Up to 16 units (UR-3 bonus zone)	45 ft (4 to 5 stories)
Yakima	6 units	35 ft (3 stories)
Seattle (Neighborhood Centers)	Unlimited (Regulated by FAR)	50 to 65 ft (5 to 6 stories)
Vancouver (Medium-Scale Zone)	Unlimited	75 ft (approx. 6 stories)

2. The Spatial Misapplication of Transit-Oriented Development Even when compared to Seattle, the Comp Plan's application of 'Medium Scale Density' is fundamentally flawed. Seattle strictly limits this massive upzoning to an 800-foot radius around Major Transit Stops such as BRT, Light Rail, and Commuter Trains. If a neighborhood only has an hourly bus, Seattle does not apply this zoning. Vancouver's Comp Plan is proposing Medium-Scale zoning for neighborhoods where there are no arterial roadways, thoroughfares, or mass transit, where the local bus runs only once an hour, stops before 7:00 PM, and does not run on weekends. Even under Seattle's urban center rules, our neighborhoods would never qualify for this upzoning.

Urban planning principles dictate that density is allocated to areas with existing high-capacity transit, robust roadway infrastructure, proximity to employment opportunities, and commercial viability for lot assembly. The proposed "Medium-Scale" map in Vancouver's Comp Plan inversely correlates with these principles.

The Comp Plan blankets established residential neighborhoods (such as Hough, Shumway, Carter Park, Northwest, and Lincoln) with 'Medium-Scale' zoning. These neighborhoods feature narrow local access streets, zero BRT infrastructure, and highly cost-prohibitive assembly economics.

Conversely, neighborhoods that actually possess robust transit oriented development profiles such as direct BRT access and and immediate thoroughfare and freeway access, closer proximity to commercial hubs for employment, and are already experiencing the

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				revitalization associated with favorable assembly economics like Rose Village or Fruit Valley remain largely unaffected by this new 6-story zoning. This arbitrary spatial application contradicts the foundational infrastructure requirements necessary to support mid-rise density. **3. The Absence of Mandated Subarea Plans** By applying 'Medium-Scale' zoning to R6 and R9 neighborhoods, the city is bypassing critical scrutiny. Under the city's own urban planning standards, high-density districts require the localized infrastructural mitigation of a dedicated Subarea Plan. A 6-story, 80-unit apartment building requires specific traffic mitigation, fire apparatus access, and utility load planning that simply does not exist on narrow local access roads. By applying this zoning globally through the Comprehensive Plan rather than through localized Subarea Plans, the city is effectively evading its obligations under SEPA. This failure to transparently disclose and locally mitigate these severe infrastructural impacts violates state law and exposes the entire zoning map to invalidation by the Growth Management Hearings Board. **4. The Mathematical Fallacy of the Growth Mandate** City staff have consistently cited the Clark County 2025-2045 Comprehensive Growth Management Plan update, which assigns Vancouver a growth allocation of roughly 38,000 new housing units, as the primary justification for the proposed zoning changes. However, the city's own data proves the 6-story map is entirely unnecessary to meet this mandate. According to Table 2 of the Comp Plan, the city only expects to yield 15,800 units across 6,300 acres of Medium-Scale zoning over the next 20 years. That is an average of 2.5 new units per acre. The proposed "Low-Scale" zoning allows 4 to 6 units per lot (yielding roughly 15 to 20 units per acre). Therefore, applying "Low-Scale" zoning across the board mathematically absorbs the entire 2.5 unit/acre forecast while actually fitting the infrastructure of our streets. Because the baseline Low-Scale zoning across the city satisfies our statutory growth obligations, the application of "Medium-Scale" on current R6 and R9 neighborhoods provides no statutory benefit, it merely legalizes an infrastructural crisis.. **Conclusion** The data clearly demonstrates that 6-story Medium-Scale zoning is mathematically unnecessary to fulfill Vancouver's GMA housing targets, incompatible with our residential infrastructure, and procedurally flawed in its public presentation. Public participation cannot be considered legally meaningful if the broad dissemination of the proposal is fundamentally misleading regarding the physical scale of the changes and the purpose behind the changes. This misrepresentation effectively nullifies the public's right to accurately comment during the State Environmental Policy Act (SEPA - RCW 43.21C) review process. I urge the City Council to direct Community Development staff to remove the "Medium-Scale" reclassification of our R-6 and R-9 neighborhoods from the final draft of the Comp Plan prior to the June vote. Vancouver should fully embrace Low-Scale Density "Middle Housing" to comply with HB 1110 and equitably absorb our required regional growth, and abandon the destructive push for High-Density Midrises in our neighborhoods. Thank you,	

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<tr><td>Email Planning Commission, Email Our Vancouver</td><td>4/11/2026</td><td>Joshua J.</td><td></td><td>I am submitting this analysis for the public record regarding the Comprehensive Plan Draft. After auditing the spatial application of the "Medium-Scale" (6-story) overlays against established urban planning principles, the city’s state-mandated growth targets, and communications from City Staff, the current Comp Plan demonstrates severe legal, mathematical, and infrastructural inconsistencies that expose the city to unnecessary procedural risk.
To ensure the final plan is compliant with the Growth Management Act (GMA) and the State Environmental Policy Act (SEPA), these four critical flaws must be addressed prior to final recommendation.
1. Procedural Risk: The Conflation of HB 1110 and Urban Mid-Rise Zoning (Medium Scale Density) The City’s public engagement strategy has consistently framed the rezoning of our Low Density (R-6 and R-9) neighborhoods into ‘Medium Scale Density’ as a standard compliance measure with Washington State’s HB 1110 "missing middle" housing initiative.
HB 1110 does mandate a transition away from single-lot exclusivity (allowing 4 to 6 units per lot), however it does not mandate the “Medium Scale Density” uncapped zoning of 6-story buildings in currently R6 and R9 areas. By removing maximum unit caps and providing for 6-story building envelopes, the allowable density jumps from the current 5-8 units per acre to 80 to 120 Units Per Acre. This is an up to 2,400% increase in allowable density.
<table>
<tr><th>City / Zoning Model</th><th>Previous Zoning Baseline (Min. Lot Size)</th><th>Max Height Limit</th><th>Theoretical Density</th><th>Practical Density</th><th>Magnitude of Density Increase</th></tr>
<tr><td>Austin, TX (HOME Initiative)</td><td>SF-3 (5,750 sq. ft.)
~5 to 6 DU/ac</td><td>2 to 3 Stories</td><td>~24 DU/ac</td><td>12 to 18 DU/ac</td><td>Up to 3x Density Increase</td></tr>
<tr><td>Portland, OR (RIP & RIP2)</td><td>R5 (5,000 sq. ft.)
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a fundamental misrepresentation of the draft plan's physical scale, which compromises the legal mandate for "early and continuous public participation" (RCW 36.70A.140).

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Email Planning Commission	4/12/2026	Ben M.	Vice President, Northwest Neighborhood Association	**Dear Members of the Planning Commission ,** I am writing regarding the proposed Comprehensive Plan updates under the *Our Vancouver, Our Future 2045* process. I appreciate the significant effort that has gone into aligning the plan with state requirements and addressing the city's long-term housing needs. Like many residents across Vancouver, those of us in the Northwest Neighborhood recognize and support the need for increased housing supply and thoughtfully planned density. My purpose in providing this feedback is not to oppose growth, but to encourage a more deliberate alignment between zoning policy, infrastructure capacity, and neighborhood-scaled outcomes—particularly as they relate to the proposed Medium Scale zoning with uncapped density. The Northwest Neighborhood illustrates both the opportunity and the risk inherent in the current proposal. I live next to Franklin Elementary School, which hosts Vancouver Public Schools' Mandarin Language Immersion program. The long-term viability of schools like Franklin depends on incremental residential growth nearby. In that sense, additional housing—and additional residents—are not only welcome but necessary. However, the concern shared by many in our neighborhood is not whether density should increase, but *how* it should increase. The current Medium Scale zoning framework would allow six-story multifamily buildings of 24 units or more to replace existing single-family housing, without a defined upper limit on unit count. In an area where the transportation, utilities, and services network was never designed to accommodate that level of intensification, this creates a significant mismatch between land use policy and infrastructure reality. Lincoln Avenue, the primary north–south corridor, remains a two-lane roadway with narrow bicycle lanes, limited shoulders, and long segments without sidewalks. 39th Street already experiences significant congestion and limited capacity peak hours. Bernie Drive and Washington St. are also primary routes out of the neighborhood, and both have constrained sightlines, are narrow, and have significant safety concerns. Without clearly defined, funded, and timely transportation improvements, large-scale redevelopment risks exacerbating existing deficiencies rather than resolving them. During outreach, residents have heard two assurances that appear to be in tension. On one hand, we are told that larger developments will generate the revenue necessary to fund infrastructure improvements. On the other hand, we are told that this type of development is unlikely to occur in our neighborhood at all. If significant redevelopment is indeed unlikely, then the rationale for applying Medium Scale zoning—and its associated impacts—becomes unclear. Conversely, if such redevelopment *is* expected, the lack of a concrete infrastructure phasing and financing strategy is concerning, particularly in cases where affordability provisions may defer or waive impact fees. From a planning and equity perspective, uncapped density in Medium Scale zones may also produce unintended outcomes. Rather than encouraging incremental, homeowner- or small-developer-led infill, it strongly incentivizes large-scale acquisition by well-capitalized developers seeking to maximize unit yield to maximize return on investment. This dynamic can reduce opportunities for first-time homebuyers, shift housing stock toward a permanent rental class, and accelerate speculative pressure on adjacent single-family homes. By contrast, the proposed Low Scale Neighborhood zoning already exceeds state minimum requirements while enabling meaningful "gentle density" through duplexes, fourplexes, and townhome development. This approach increases housing supply, supports neighborhood schools, and expands homeownership opportunities while integrating more seamlessly with existing infrastructure and neighborhood character. More housing is needed. More equity is needed. More attainable pathways to homeownership are needed. My concern is that the current zoning approach, while well-intentioned, may undermine those goals through scale, speed, and consolidation rather than advance them through incremental, infrastructure-aware growth. I respectfully urge you to consider broader application of Low Scale Neighborhood zoning—paired with targeted, funded infrastructure improvements—to better advance the Comprehensive Plan's stated objectives while avoiding second-order impacts through Medium Scale zoning that may be difficult or costly to reverse. Thank you for your time and your careful consideration of these issues. Sincerely,	Included in 4/14 PC testimony

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Email City Council	4/13/2026	Tom K.		Comments on the City Comprehensive Plan and Zoning Code Update April 13, 2026 Vancouver City Councilors: Slow it down; tone it down. Thank you for the opportunity to comment on this important and potentially life-changing Comprehensive Plan Update. A few over-arching points for you to consider: 1. Please delay adoption of the update in order to give your constituents time to understand it and comment. While city planners have been engaged for three years, the zoning map that will designate lot sizes, building heights and other increased density issues, has been public only since Feb. 19, just over seven weeks ago. An updated version of 292 pages was released just late Friday. The plan's complexity and scope require time to absorb and understand. Few people I've spoken with are aware of this process or what it might mean for their neighborhoods. I helped organize a special meeting of our Northwest Neighborhood Association on March 19. Few of the 40 attending in this engaged neighborhood were knowledgeable about the plan; some were completely unaware. Meanwhile, only 33 people commented between Feb.19 and March 31 on a city on-line form. Fears that the city will lose state grant funding appear overstated, and are not a good reason to rush through such momentous changes. 2. Why is the city requiring more density than is required by the population estimates given it by the state and county? Meeting the increased density of the county-provided population forecast -- adding more people, cars, need for parking and demands on infrastructure -- will be difficult enough. 3. The city should cooperate closely with the county in designing density for the city's urban growth area. There are nearly as many people - 171,000 - in the UGA as there are in the City of Vancouver - 202,000. It makes no sense to require increased density in the city without concomitant density in areas expected to be a part of the city. 4. The draft plan speaks at length to creating a positive "community experience: for all residents. Please consider ways to mitigate the impact of increased population and density in existing neighborhoods for long-time citizens as well as newcomers. Thank you.	Included in 4/13 CC testimony

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Email Planning Commission	4/13/2026	Robin O.		Hello Zoning Commission, I understand that the proposed Comprehensive Plan calls for limited notification regarding development projects and zone changes in neighborhoods. Specifically I'm talking about the building of 7-200 structures, which will not require mailed notification of the proposal. Instead it will require only that a sign be erected at the site. Your spokespeople at the meetings about the Comp plan said that is because "no one reads their mail anymore," and that people are always driving around their own neighborhoods and will certainly see a sign. I take issue with those statements. Currently my own neighborhood is facing a proposal for intense INFILL development in our neighborhood. It is for 82 single-family homes on tiny lots on 7.5 acres, so it is easy to use as an example. Many of the people who will be impacted by the increased traffic to and from this INFILL site do not have reason to drive by this particular parcel as it is deep within an existing residential (R9) neighborhood, and many do not live within 500' of the project area. Instead, their homes lie along the residential streets new residents will use to repeatedly come and go from the infill development. And those same residents rely on these roads for emergency vehicle access, which could be compromised by increased traffic and parking problems. How are property owners such as these to know about a proposed development which may adversely impact them with increased traffic and safety issues? At the very least, mailed notifications will help alert some owners. A sign, in addition, will help alert probably the same households. So there needs to be AN EXTENSION of the area of notification that includes ALL who will be impacted by development. It's obvious to all who work on such projects that vehicles will need egress — what are the routes these vehicles will likely take? Where are the property owners who will need to contend with the increased vehicular traffic? Do they not have a right to be made aware of such proposals, and to voice their support or concerns? And as to physical mail — please continue to send it. My research is only anecdotal, but my queries of family and friends established that people are still reading their mail! (Do you disregard yours?) Please rethink your notices for rezoning and development. Include MORE people, not fewer!! Thank you,	Included in 4/14 PC testimony

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Email Our Vancouver	4/13/2026	Marlece W.		I have read the community plan. I would like to have a conversation with someone about how my community can contribute to the community plan. What is the appropriate way to engage in a conversation with the city about this?	Staff replied on 4/13/2026

Source	Date	Name	Affiliation (if any)	Content	Notes
Email City Council, Email Planning Commission	4/14/2026	Paul G.		Dear City Council, I am writing again regarding the Vancouver Comprehensive Plan Draft Preferred Alternative and its impact on the Dubois Park Neighborhood. I previously raised this concern in December but did not receive a response. With upcoming council discussions, I want to ensure this issue is clearly seen and considered before decisions move forward. A specific group of lots—those west of Devine Road and just south of MacArthur Boulevard—has been designated Medium Scale Neighborhood (up to 5 stories / 75 feet), while the rest of Dubois Park remains Low Scale Neighborhood (up to 3 stories / 45 feet). This inconsistency is not minor—it fundamentally alters the character and future of this neighborhood. As currently proposed, Dubois Park could effectively be surrounded by 5-story, 75-foot multi-family buildings. This is not a theoretical concern. It directly translates to increased congestion, parking pressure, safety issues, and real impacts on property values for existing residents. I ask you to look closely at the map and consider the lived reality: a homeowner on Santa Fe Drive facing a 5-story structure across the street. This is a significant and permanent change to light, privacy, and neighborhood scale—one that is not being applied evenly across Dubois Park. This concern is compounded by the fact that the area east of Santa Fe Drive is already facing major impacts from the Heights Redevelopment project. The current zoning proposal adds a second layer of intensity on the same area, creating a disproportionate burden on a small portion of the neighborhood. My request remains straightforward and reasonable: align the zoning of the lots west of Devine Road and south of MacArthur Boulevard with the rest of Dubois Park by designating them as Low Scale Neighborhood. This is a small, targeted adjustment that preserves consistency, fairness, and the intended character of the neighborhood—without undermining the broader goals of the Comprehensive Plan. I respectfully ask that this issue be acknowledged and addressed as part of the current review process. I would also appreciate confirmation that this concern has been received and considered. Thank you for your time and attention. Sincerely,	Staff replied 5/5/2026. Included in 4/14 PC testimony. Included in 4/27 CC testimony.

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Staff	4/14/2026	Ben M.	Vice President, Northwest Neighborhood Association	I wanted to follow up on my written and in-person communication with the planning commission this week. I regularly receive feedback from residents of the Northwest Neighborhood wondering why the city split the neighborhood between the Medium Scale and Low Scale designations. I don't know the answer, so I wanted to follow up with you to find out more. In looking at both Alternative 1 and Alternative 2 of the proposed comprehensive plan updates, no part of the Northwest Neighborhood was considered for the Medium scale designation. In Alternative 1, obviously there is no Medium scale designation at all, but in Alternative 2, the Medium scale designation stops at the Lincoln-Northwest Neighborhood boundaries, a few blocks north of 39th St. According to the Draft EIS, both alternatives exceed housing targets, with the higher density Alternative 2 far exceeding the minimum housing targets. However, in the preferred alternative, the Medium scale designation winds up going as far north as 53rd st (but only west of Lincoln Avenue) and then has more Medium Scale clustered around Franklin Park around 58th and 59th St. None of these areas have the infrastructure to handle this level of potential densification. They feed out into narrow two-lane streets, have poor multimodal safety, and are already routinely packed with cars (both parked and driving), pedestrians and cyclists. I am unable to see the difference between the areas acceptable for Medium Scale and houses just a few yards away that are in the Low Scale designation which all utilize the same infastructure and access routes. I would love to get your feedback to better understand the methodology and reasoning in having the Medium Scale designation expand as far into the neighborhood as it does, particularly when the area was not included in any of the prior draft alternatives. Many of my neighbors and I are not opposed to growth or increased density in the Northwest Neighborhood. As I told the Planning Commission, I welcome and encourage it. Every neighborhood in Vancouver will have to play a part to meet our housing challenges. However, I do struggle to explain and understand how potential maximum level development will benefit an area with limited routes in-and-out and infrastructure that is already straining to meet existing demand on surfaces and services. I don't understand the purpose of the Medium Scale designation in this instance when the Low Scale designation already significantly increases density, meets housing target goals and encourages sustainable and equitable growth. Thank you again for all your work and time and effort on this project and for taking the time to present to our Neighborhood. It is greatly appreciated. I've included a screenshot of the area in question below. Sincerely,	Staff replied 4/28/2026

Source	Date	Name	Affiliation (if any)	Content	Notes
					
Email Our Vancouver	4/14/2026	Marlece W.		Enclosed is the information for the public comment session for tonight. You are receiving and executive summary followed by a proposal with more detail. I am also sharing this presentation with a link: https://docs.google.com/document/d/1OXH8qaFcsxLLX3pdy1Qi99mEXqCQQKoPQX3__aLaZJM/edit?usp=sharing Thank you for your help.	

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Staff	4/14/2026	Matt H.	Port of Vancouver	**General Comment** • **Context:** Development regulations often benefit from a limited mechanism for administrative flexibility or alternative compliance to account for site-specific conditions and varied project types. Without such a provision, prescriptive standards can be challenging to apply consistently and may lead to unnecessary complexity in project design and review. o **Requested change:** Add a general provision allowing City planners to approve alternative compliance or limited flexibility where an applicant demonstrates that the intent and performance objectives of a standard are met. This would improve implementability of the code, support efficient administration, and help ensure regulations are applied in a practical and predictable manner across different projects. **Notification Requirements for Land Use Applications** *(Chapters 20.210.040 – 20.210.060 Decision-Making Procedures)* • **Context:** The draft code includes expanded requirements for signage and notification requirements for Type I Site Plan Review and Type II/III land use and building permits. These requirements would add an additional burden of time and cost to Port projects, which already require extensive public notice (through identification in the Port's Comprehensive Scheme of Harbor Improvements (CSHI) per RCW 53.20.010, and as part of the Port's SEPA process). The expanded signage requirements would also be an unnecessary burden for projects conducted within secured or non-public areas of the Port. o **Requested change:** Provide exemptions in 20.210.030 comparable to: "Projects that require public notice as mandated by RCW 53.20.010 are exempt from the requirements for posting/public notice described in this chapter." "Projects that have previously notified the applicable Neighborhood Association through a SEPA process are exempt from the requirements for neighborhood notification described in this chapter." **Allowed Uses in Industrial/Employment (IE) and Heavy Industrial (HI) Zones** *(Chapter 20.160.020, Chapter 20.430.040, and Tables 20.430.050-1 through 20.430.050-8)* • **Context:** There is some uncertainty as to whether common Port activities (manufacturing, outdoor stockpiles/ materials, cargo, transloading, bulk/large components (wind turbines, etc.), large warehouses, storage, laydown, cars, outdoor storage) are clearly permitted in the IE and HI zones. o **Requested changes:** Amend use-classification definitions for Industrial Uses in 20.160.020(F) to explicitly address the following routine Port activities: outdoor bulk storage, cargo handling, transloading, laydown yards, assembly of large equipment, and stockpiles of dirt/soil/clean fill materials). Amend table 20.430.050-6 (Industrial Use Requirements) as necessary to include these activities as allowed uses in the HI zone. • **Context:** Several of the activities included in the definition of "Employment Services" and "Wholesale Sales" are regularly conducted within HI-zoned areas of the port, yet these uses are currently identified as "not allowed" in Table 20.430.050-6. Amend table 20.430.050-6 (Industrial Use Requirements) to allow for "employment services" and "wholesale sales" as permitted uses in the HI zone.	

Source	Date	Name	Affiliation (if any)	Content	Notes
				• **Context:** The activities included in the definition of “Basic Utilities” are regularly conducted within HI-zoned areas of the port, yet this use is currently identified as “not allowed” in Table 20.430.050-7. Amend table 20.430.050-7 (Infrastructure Use Requirements) to allow for “basic utilities” as a permitted use in the HI zone. **Buffers Between Industrial and Residential Zones** *(Draft VMC Chapter 20.410, and Table 20.410.060-1)* • **Context:** The draft update requires substantial buffers, berms, and setbacks where industrial (IE and HI) zones abut residential zones, which could be sufficiently restrictive to make development infeasible on such parcels. Also, the burden of o **Requested change:** Provide room for project-specific flexibility within these buffer requirements, where the intent of the buffering can be met through alternative means. providing a buffer is borne entirely by the HI/IE parcel, as there is no requirement for residential zones to buffer or setback from existing industrial uses in HI/IE zones. Also, consider requiring new residential developments adjacent to established industrial uses to provide some comparable measure of buffering. **Building Type, Frontage, and Massing Standards in Industrial Areas** *(Draft VMC Chapter 20.420.070 Building Types)* • **Context:** Building height and frontage standards for buildings allowed within the HI/IE zones may not provide sufficient flexibility, and may conflict with Port operational needs, particularly within secured or interior industrial areas. o **Requested change:** Exempt allowed building types within the HI/IE zones from building-type and frontage standards, or provide alternative compliance for Port and industrial facilities that do not front public streets or are located within secured operational areas. **Bicycle Parking Requirements in Secured Industrial Areas** *(Draft VMC Section 20.450.045, and Table 20.450.045-6* • **Context:** Proposed requirements for long-term and short-term bicycle parking requirements would conflict with operations within secured, non-public portions of the Port. o **Requested change:** Exempt activities conducted within secured, non-public areas of the Port, or Port sites otherwise not accessible from a public road, from the long-term and short-term bicycle parking standards, or allow flexibility for alternate compliance. **Tree Mitigation, Density, and Canopy Requirements** *(Draft VMC Section 20.450.035)* • **Context:** The draft code references mitigation fees related to tree removal, tree density, and tree canopy standards, but the information is distributed across multiple sections of the code. Having this mitigation/fee language structured this way makes it difficult to understand how requirements relate to one another and raises the risk of overlapping or duplicative mitigation for the same impact. o **Requested change:** Consolidate all code language regarding mitigation related to trees (including fees tied to tree removal, tree density, or canopy standards) into a single, standalone subsection of 20.450.035. A unified mitigation section would improve clarity, transparency, and consistent application, while still allowing the City to meet its urban forest and canopy goals.	

Source	Date	Name	Affiliation (if any)	Content	Notes
				Tree, Vegetation, and Soil Plan Terminology *(Draft Section 20.450.035)* • **Context:** There is some remaining inconsistency in terminology referring to tree plans variably as “Tree, Vegetation, and Soil Plan”, “tree plan”, and “tree removal plan”, which leads to some ambiguity. o **Requested change:** Standardize references to “Tree, Vegetation, and Soil Plan” throughout 20.450.035, or clarify if there are different documents with unique requirements. **Tree Canopy Coverage Standards and Calculations** *(Draft Section 20.450.035)* • **Context:** The Port supports the City’s climate goals and its intent to protect and expand the urban tree canopy. However, the new tree canopy standard adds complexity without a clear environmental benefit and creates an additional administrative burden during project planning and review. The Port notes that the City’s existing tree density standards already function as a proxy for tree canopy, since trees inherently provide canopy as they mature. Regulating both tree density and canopy measures the same outcome through overlapping metrics. This dual approach increases analysis and compliance effort, introduces potential for inconsistent interpretation, and complicates permitting and compliance without materially advancing canopy or climate outcomes beyond what the density standards already achieve. Streamlining the tree permitting approach would improve predictability, reduce administrative burden for applicants and staff, and still fully support the City’s long-term canopy and climate objectives. • **Requested change:** Consider removing the new tree canopy standards and requirements, and use the established tree density standard to achieve both tree retention and canopy goals. Alternatively, allow projects to demonstrate compliance through either tree density or canopy requirements, rather than as an additional overlapping regulatory standard.	

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Staff	4/16/2026	h m		I will never forgive you for this. I have semis in my yard inches from my face. And I'll never stop telling anyone who will listen how you purposefully poisoned thousands of lower income residents You never even looked at what we wanted. You set out to harm low income and corral us away from real neighborhoods with homes and parks . Those are just for higher income residents . We aren't welcome here at all. Since the warehouses and semis now own what used to be high density residential , can you you just condemn my house now ? My insurance isn't going to cover me any more and my lender will foreclose if I can't get homeowners insurance Did anyone think of what living in industrial pollution would do to our physical and mental health or was that the plan all along? Can I put my tent on your lawn?	Staff called to follow up with this person

Source	Date	Name	Affiliation (if any)	Content	Notes
Email City Council, Email Planning Commission	4/17/2026	Sharon R.		Dear City Council and Planning Commission, Please include my following written comments as public testimony. Canopy cover is an important measure of the health of our community. Urban trees provide numerous ecological, economic, and social benefits, including neighborhood livability, and improved public health outcomes. Maintaining our urban canopy is a cooperative effort between property owners, developers, neighbors, and the City. To reduce climate impact exposure in our neighborhoods and support climate resilient development, I urge the City of Vancouver **adapt a tree protection code for developers.** I live in the Hough neighborhood among 100 year old homes. Hough is a historic neighborhood with many heritage and 100-year old trees. It is a mix of duplexes and single family homes ranging from low income to million dollar homes. As the neighborhood grows and changes, there are several abandoned or foreclosed homes. I understand the need to build units to sustain a low scale neighborhood, but developers are simply **clear-cutting** lots with no regard to the valuable urban tree canopy. I urge the city of Vancouver to adapt a tree protection code to implement the goals and policies of Vancouver's Comprehensive Plan, especially those in the Environment Element dealing with protection of the urban canopy while balancing other citywide priorities including housing production. · Preserve and enhance the City's physical and aesthetic character by preventing untimely and indiscriminate removal or destruction of trees · Facilitate tree protection efforts for development standards, and promote site planning and horticultural practices that are consistent with the reasonable use of property · Protect trees by not allowing tree removal except in hazardous situations, to prevent premature loss of trees so their retention may be considered during the development review and approval process I urge the City of Vancouver to follow the City of Seattle's commitment to protecting valuable urban canopy. Refer to Seattle's Tree Protection Code, Seattle Municipal Code (SMC) 25.11, limits the number, size, and type of trees that may be removed from private property. These regulations help protect our urban canopy. Thank you,	Staff replied 4/22/2026. Included in 4/27 CC testimony, included in 4/28/2026 PC PH testimony.

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Our Vancouver	4/17/2026	Ben M.	Vice President, Northwest Neighborhood Association	Hello! I regularly receive feedback from residents of the Northwest Neighborhood wondering why the city split the neighborhood between the Medium Scale and Low Scale designations. I don't know the answer, so I wanted to reach out to find out more. In looking at both Alternative 1 and Alternative 2 of the proposed comprehensive plan updates, the Northwest Neighborhood was considered appropriate for either none or very little of the Medium scale designation. In Alternative 1, West of i5, the medium scale designation largely stops at 4th Plain, and in Alternative 2, the Medium scale designation stops at the Lincoln-Northwest Neighborhood boundaries, except for a small sliver on the north side of Bernie Drive against Burnt Bridge Creek. According to the Draft EIS, both alternatives exceed housing targets, with the higher density Alternative 2 far exceeding the minimum housing targets. However, in the preferred alternative, the Medium scale designation winds up going as far north as 53rd st (but only west of Lincoln Avenue) and then has more Medium Scale clustered around Franklin Park around 58th and 59th St. None of these areas have the infrastructure to handle this level of potential densification. They feed out into narrow two-lane streets, have poor multimodal safety, and are already routinely packed with cars (both parked and driving), pedestrians and cyclists. I am unable to see the difference between the areas acceptable for Medium Scale and houses just a few yards away that are in the Low Scale designation which all utilize the same infrastructure and access routes. I would love to get your feedback to better understand the methodology and reasoning for having the Medium Scale designation expand into as much of the neighborhood as it does, particularly when the area was not included in any of the prior draft alternatives. Many of my neighbors and I are not opposed to growth or increased density in the Northwest Neighborhood. As I told the Planning Commission, I welcome and encourage it. Every neighborhood in Vancouver will have to play a part to meet our housing challenges. However, I do struggle to explain and understand how potential maximum level development will benefit an area with limited routes in-and-out and infrastructure that is already straining to meet existing demand on surfaces and services. I don't understand the purpose of the Medium Scale designation in this instance when the Low Scale designation already significantly increases density, meets housing target goals and encourages sustainable and equitable growth. Thank you again for all your work and time and effort on this project. I've included a screenshot of the area in question below.	Staff replied 4/28/2026

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Email Our Vancouver	4/20/2026	Mary K.		Please let me know the cost of obtaining printed copies of the Final EIS, the current proposed code update (third draft?) and the current proposed written plan (third draft?). Also, please let me know if and when these materials will be available at local libraries.	Provided hardcopies of third drafts of plan and code and of Final EIS in City Hall lobby

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Our Vancouver	4/21/2026	Mary K.		After reading city materials, I am sill somewhat confused about the building/development potential in low-scale residential areas. I think that's because it is not always clear what constitutes a "unit". If there is a minimum density of eight "units" per acre and an "allowance" of 6 "units" per parcel, what happens if there are eight 5,000 square-foot parcels/lots on one acre? Are four-six "units" allowed on each 5,000-square-foot piece of land? Is it then correct to conclude there could be up to 48 units (dwellings?) on one acre? I think Rebecca said that is the case, but I need to confirm that before I say more about the plan update in the company of others.	Staff replied 4/22/2026
Email Councilmember	4/22/2026	Tom K.		I'm writing to you as the one I know on the Council. Mary and I have spent a lot of time researching the proposed update, thinking it over and getting the NW Neighborhood Assn. involved (I was president many years ago). My main suggestion is that because few people are aware of the plan or its ramifications, the Council should not rush into approval. While planners say they've been engaging the public for three years, most of that was aspirational, i.e. "would you like to have safe neighborhoods, be close to stores, etc." The plan's details have only been public since Feb. 19, just two months ago. And that's been changing since. In addition, the draft EIS was out for public comment last summer, typically when people are on vacation and not paying attention. We weren't. Planners say we're already late and risk losing state grants. Those aren't solid reasons to rush through a plan that will affect every home in Vancouver, changing the city's character forever. I have other concerns about coordinating planning in the UGA, and the planners use of higher population projections then necessary that are addressed in the comments I submitted, see attached. Bottom line, this is way too important to not have the understanding and input of city residents. Please slow it down and tone it down. Vancouver City Councilors: Slow it down; tone it down. Thank you for the opportunity to comment on this important and potentially life-changing Comprehensive Plan Update. A few over-arching points for you to consider: 1. Please delay adoption of the update in order to give your constituents time to understand it and comment. While city planners have been engaged for three years, the zoning map that will designate lot sizes, building heights and other increased density issues, has been public only since Feb. 19, just over seven weeks ago. An updated version of 292 pages was released just late Friday. The plan's complexity and scope require time to absorb and understand. Few people I've spoken with are aware of this process or what it might mean for their neighborhoods. I helped organize a special meeting of our Northwest Neighborhood Association on March 19. Few of the 40 attending in this engaged neighborhood were knowledgeable about the plan; some were completely unaware. Meanwhile, only 33 people commented between Feb.19 and March 31 on a city on-line form.	Staff replied on 4/27/2026

Source	Date	Name	Affiliation (if any)	Content	Notes
				Fears that the city will lose state grant funding appear overstated, and are not a good reason to rush through such momentous changes. 2. Why is the city requiring more density than is required by the population estimates given it by the state and county? Meeting the increased density of the county-provided population forecast -- adding more people, cars, need for parking and demands on infrastructure -- will be difficult enough. 3. The city should cooperate closely with the county in designing density for the city's urban growth area. There are nearly as many people - 171,000 - in the UGA as there are in the City of Vancouver - 202,000. It makes no sense to require increased density in the city without concomitant density in areas expected to be a part of the city. 4. The draft plan speaks at length to creating a positive "community experience for all residents. Please consider ways to mitigate the impact of increased population and density in existing neighborhoods for long-time citizens as well as newcomers. Thank you.	

Source	Date	Name	Affiliation (if any)	Content	Notes
Form City Council	4/22/2026	Savannah D.		Dear Mayor and City Council Members, I am resubmitting my policy brief regarding cooling equity in affordable housing, which addresses extreme heat risk in Vancouver's urban heat islands.Please use this updated version for the official public record for the 04/27/2026 City Council meeting and disregard the previously submitted version. If additional time is needed for review, I kindly ask that it be included in the public record for the following City Council meeting on May 4, 2026.I am submitting this document for your review and request that it be included as my written testimony in lieu of speaking during the meeting.I am happy to answer any questions via email or provide any additional information if needed.Thank you for your time and service to the Vancouver community. **Policy Brief** *Cooling Equity in Affordable Housing: Addressing Extreme Heat Risk in Vancouver's Urban Heat Islands* **Prepared for:** City of Vancouver **Prepared by:** Savannah [last name], MS, Applied Anthropology **Date:** April 22, 2026 *Developed through Leadership Clark County 2026* **Executive Summary** Extreme heat events are becoming more frequent and severe, posing growing risks to public health and safety (Centers for Disease Control and Prevention, 2023; U.S. Environmental Protection Agency, 2024). These impacts are not evenly distributed across communities; residents living in urban heat islands and households without access to adequate cooling infrastructure face disproportionately high risks of heat-related illness (Clark County Public Health, 2024b; U.S. Environmental Protection Agency, 2023). In Vancouver, the Fourth Plain corridor has been identified as a documented urban heat island through Clark County's Heat Watch mapping project (Clark County Public Health, 2024a). Many residents in this area live in affordable housing without air conditioning or cooling-ready infrastructure (Clark County Public Health, 2024a). Because many households are renters, residents often lack the ability to install cooling systems independently (Clark County Public Health, 2024a). As extreme heat events become more common (U.S. Environmental Protection Agency, 2024), this gap in housing infrastructure presents a growing public health and environmental justice concern. This policy brief recommends that the City of Vancouver adopt a cooling equity approach to climate and housing policy by requiring cooling-ready infrastructure and installed air conditioning in new affordable housing developments capable of maintaining safe indoor temperatures during extreme heat events (e.g., 100°F+ conditions), while also developing a phased retrofit strategy for existing city-supported affordable housing in these high-risk areas. Cooling-ready infrastructure refers to housing with the electrical capacity, wiring, ventilation, and physical provisions necessary to safely support installed air conditioning systems during extreme heat events. These recommendations align with broader emergency management goals by prioritizing life safety and risk reduction before extreme heat events occur, while also reducing strain on emergency response systems during heat-related incidents. 2 **The Problem: Extreme Heat Is a Growing Public Health Risk** Extreme heat is one of the leading weather-related causes of illness and death in the United States (U.S. Environmental Protection Agency, 2024). Lack of access to air conditioning is one of the strongest risk factors for heat-related illness during extreme heat events (Centers for Disease Control and Prevention, 2023). Urban heat islands occur in areas with extensive pavement, dense development, and limited tree canopy. These conditions cause neighborhoods to retain more heat than surrounding areas (U.S. Environmental Protection Agency, 2023). Clark County's Heat Watch mapping project documented significant variation in temperatures across neighborhoods. The study found that the Fourth Plain corridor in Vancouver, Washington experienced some of the hottest afternoon temperatures recorded during the study period (Clark County Public Health, 2024a). The Fourth Plain corridor is one of Vancouver's most diverse and economically vulnerable areas and is home to a large multicultural community, including many Latino and immigrant households (City of Vancouver, 2023). People living in urban heat islands or without access to air conditioning face significantly higher risks of heat-related illness (Clark County Public Health, 2024b).	Included in 4/27/2026 CC testimony

Source	Date	Name	Affiliation (if any)	Content	Notes
				While cooling centers and emergency response programs are important, they do not replace the need for safe indoor temperatures in people's homes. **Community Vulnerability in the Fourth Plain Corridor** The Fourth Plain corridor is one of Vancouver's most diverse and economically vulnerable areas. Data from the City of Vancouver's Fourth Plain Forward initiative highlights several factors that increase vulnerability during extreme heat events (City of Vancouver, 2022b): • 69% of residents are renters (48% citywide) • 17% of families live below the poverty line (8% citywide) • 34% of residents speak a language other than English at home (20% citywide) • 21% of residents rely on public transportation (3% citywide) • 46% of residents live with a disability (38% citywide) These overlapping social and environmental conditions increase the risk of heat-related illness for residents living in affordable housing without access to cooling. 3 **Housing Infrastructure and Cooling Capacity** Many affordable housing developments rely on passive cooling strategies or heat pump systems. While these systems may provide moderate cooling under normal conditions, they may not maintain safe indoor temperatures during extreme heat events, particularly in buildings without sufficient cooling capacity (Vrettos et al., 2022). Ensuring that housing developments include reliable cooling infrastructure, such as cooling-ready systems and installed air conditioning, is therefore an important climate adaptation and public health strategy. As climate conditions change, housing design must consider both energy efficiency and resilience to extreme heat. **Policy Recommendation** To address growing heat-related risks and housing inequities, the City of Vancouver should adopt a cooling equity policy for affordable housing developments located within documented urban heat islands. The City of Vancouver should: • Require that new city-funded and city-supported affordable housing developments located within documented urban heat islands include cooling-ready infrastructure and installed air conditioning systems capable of maintaining safe indoor temperatures during extreme heat events. • Prioritize implementation in neighborhoods identified as urban heat islands through Clark County's heat mapping project, including areas along the Fourth Plain corridor. • Develop a phased retrofit strategy to install air conditioning in existing city-supported affordable housing located within documented urban heat islands, prioritizing buildings serving seniors, people with disabilities, low-income households, and other communities disproportionately impacted by extreme heat, including multilingual, immigrant, and historically underserved residents along the Fourth Plain corridor. Possible implementation strategies may include: • Incorporating cooling requirements into affordable housing funding agreements. • Integrating cooling upgrades into housing rehabilitation or preservation programs. • Utilizing climate resilience, infrastructure, or housing funds to support cooling retrofits. 4 **Conclusion** Extreme heat is an emerging public health challenge in Vancouver and across Clark County. Residents living in urban heat islands, particularly renters in affordable housing, face disproportionate risks when adequate cooling infrastructure is not available.	

Source	Date	Name	Affiliation (if any)	Content	Notes
				By requiring cooling-ready infrastructure and installed air conditioning in affordable housing developments located in urban heat islands, the City of Vancouver can reduce heat-related inequities and strengthen long-term community resilience. Ensuring safe indoor temperatures will become increasingly critical as extreme heat events intensify. These recommendations align with and operationalize the City of Vancouver's Climate Action Framework, which prioritizes climate resilience for overburdened communities and supports both cooling-ready infrastructure in new affordable housing developments and air conditioning retrofits in existing housing as key adaptation strategies (City of Vancouver, 2022a). **References** Centers for Disease Control and Prevention. (2023). *Heat and health*. https://www.cdc.gov/heat-health/index.html Clark County Public Health. (2024a). *Heat Watch summary report: Mapping heat distribution in Clark County.* https://clark.wa.gov/sites/default/files/media/document/2025-03/heat-watch-summary-report-2024-compressed-updated3.25.pdf Clark County Public Health. (2024b). *Results of heat mapping project show unequal distribution of heat in Clark County.* https://clark.wa.gov/public-health/results-heat-mapping-project-show-unequal-distribution-heat-clark-county City of Vancouver. (2022a). *Climate Action Framework*. https://www.cityofvancouver.us/wp-content/uploads/2023/08/vancouvercaf_final_121422.pdf City of Vancouver. (2022b). *Fourth Plain Forward planning presentation to the Vancouver Planning Commission.* https://www.cityofvancouver.us/wp-content/uploads/2023/10/22-10-11-FPF-PC-Presentation_Final.pdf U.S. Environmental Protection Agency. (2023). *Heat island effect.* 5 https://www.epa.gov/heatislands U.S. Environmental Protection Agency. (2024). *Climate change indicators: Heat-related deaths.* https://www.epa.gov/climate-indicators/heat-related-deaths Vrettos, E., et al. (2022). *Improving the passive survivability of residential buildings during extreme heat events in the Pacific Northwest.* Applied Energy, 321. https://doi.org/10.1016/j.apenergy.2022.119323	

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Staff	4/23/2026	Brittney S.	WDFW Southwest Washington Land Use Planning Lead	The Washington Department of Fish and Wildlife (WDFW) appreciates the continued opportunity to provide comments on the Vancouver Comprehensive Plan Update. Many of the recommendations provided in our August 12, 2024 EIS scoping letter and our September 8, 2025 DEIS comment letter are reflected in the current plan, and we continue to promote those comments for your consideration. As previously noted, WDFW supports approaches that protect critical areas, maintain landscape connectivity, and minimize impacts to Priority Habitats and Species (PHS) while accommodating growth consistent with the Growth Management Act (GMA). We also continue to emphasize the importance of strategies such as clustering development, integrating green infrastructure, and avoiding impacts to sensitive habitats, including parcels supporting Oregon white oak and prairie ecosystems within the city. **This letter focuses on the goals and policies within the Vancouver Comprehensive Plan that WDFW supports, and includes recommendations to further strengthen protection of critical areas within the land use planning process. WDFW recognizes that the policies are reflected across multiple goals and chapters within the Comprehensive Plan and we support their consistent inclusion and application in other related planning efforts to ensure coordinated, effective protection and enhancement of ecological functions.** **Chapter 3: Land Use and Development** WDFW supports Vancouver's updated growth concept noted on page 76. Focusing development within centers and business corridors can help reduce sprawl, limit habitat fragmentation, and better protect critical areas and natural resources while fostering more resilient, connected communities. We strongly support Policy 156 prioritizing infill development and redevelopment of underutilized and brownfield sites, as this approach helps accommodate growth while reducing pressure to convert undeveloped lands, thereby minimizing habitat loss and fragmentation. The updated Comprehensive Plan groups land into four broad designations: Residential Neighborhood, Urban Mixed Use, Employment and Industry, and Green Space. The Green space designation is noted to include Parks and Natural Areas with Natural Areas being: *"lands currently zoned for greenways and natural areas. They strengthen biodiversity and natural systems, while connecting people to nature while protecting* 2 *resources for future generations."* It is unclear how the City is designating these greenways and natural areas but **WDFW recommends using Priority Habitats and Species (PHS) data to support with designating and protecting these ecosystems.** We would welcome the opportunity to work with the City on this effort. **Chapter 6: Climate and Environment** WDFW supports the vision outlined in Chapter 6, as it reflects the importance of balancing the built and natural environment, expanding and connecting green spaces, and advancing climate-resilient infrastructure to sustain ecological function. This chapter appropriately highlights that areas at higher risk for climate impacts include those with more pavement and fewer trees, parts of the city prone to flooding and the 100-year floodplain. We support the policies under Goal CL-1, of expanding tree canopy, green space, and other nature-based solutions as this can reduce heat impacts while also improving habitat quality, air and water resources, and overall ecosystem function. WDFW also supports integrating climate-resilient infrastructure and building practices, such as green stormwater systems and drought-tolerant landscaping, as these approaches help minimize runoff, protect water quality, and contribute to more sustainable and ecologically resilient urban environments. Goal CL-2, calls for building green infrastructure and preserving natural spaces that "enhance air quality, provide natural cooling, sequester carbon, and beautify neighborhoods…fostering rich and diverse plant and animal life." The goal also emphasizes protecting and restoring natural systems, ensuring "no net loss of ecological function," and strengthening habitat connectivity, tree canopy, and climate-resilient infrastructure to support biodiversity and community resilience. WDFW also supports Policy 35, which calls to "Acquire environmentally sensitive land with ecological benefits for the purpose of conservation," Policy 58, which directs the City to "Use canopy assessment data and the City's Equity Index to prioritize areas for tree planting and greening investments," and Policy 64, which calls to "Take inventory of and protect climate refugia, and fish and wildlife habitat needs for species under stress from climate change,". We further support Policy 107, which calls to "Protect critical areas, shorelines and other ecologically significant areas, ensure no net loss of ecological function through avoidance and mitigation of impacts, and apply conservation design principles to	

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				restore and enhance degraded areas," as it aligns with WDFW priorities to avoid habitat loss, reduce fragmentation, and restore ecological function to support PHS. **Chapter 8: Transportation & Mobility** WDFW supports Policy 120, which calls to *"Work with local, state, federal and tribal partners to ensure that new construction or replacement of critical infrastructure is planned and designed to avoid community harm and maximize social, environmental, and cultural value,"* as it aligns with the need for coordinated, multi-jurisdictional planning to protect ecological functions while delivering essential infrastructure. Transportation infrastructure design plays a critical role in maintaining habitat connectivity and supporting fish and wildlife populations. **Future transportation improvements should carefully consider impacts to fish passage, and habitat fragmentation by incorporating fish-passable culvert upgrades and early coordination with WDFW during project scoping to help identify PHS within the city and to minimize ecological impacts through early avoidance and design integration.** The City can refer to the Salmon Resource Map on the Lower Columbia Fish Recovery Board's website for information on barrier prioritization. **Chapter 10: Annexation** WDFW previously commented on the Clark Count DEIS for their Comprehensive Plan Update. In that letter, we note that there are mapped Biodiversity Areas and Corridors (BACs) within the proposed UGA expansions for all jurisdictions. BACs are areas of habitat that are particularly important because they provide habitat connectivity throughout the urban mosaic. **When BACs are present near proposed expansion areas, we recommend early consultation with WDFW.** Our staff will be able to assess whether wildlife corridors extend beyond currently identified polygons and help identify strategies for avoiding and minimizing impacts. 3 For the City of Vancouver, both alternatives include potential expansion into the Upper Salmon Creek BAC. Alternative 3 includes expansion/rezones into the Whipple-Packard Creek BAC, and areas approaching the Lacamas Lake Bottoms and Shanghai Creek. We support policy 83 within this chapter and the plan to limit UGA expansions to those clearly necessary and ensure a thorough review in the process. **We recommend the City of Vancouver carefully consider the ecological value of these areas when planning future UGA expansions and increased development.** Thank you for the opportunity to provide input. WDFW looks forward to continued collaboration with the City of Vancouver. Thank you for your consideration,	

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Email City Council, Email Planning Commission	4/24/2026	Ron A. and Josie H.	Identity Clark County	Dear Leaders: On behalf of the business leaders group Identity Clark County, we are offering comments as you deliberate growth management and city zoning code. For three years, we have been meeting with your staff regarding updating the Comprehensive Growth Management Plan and City Development Code. We appreciate the spirit of collaboration with which these plans have been developed, especially Rebecca Kennedy with whom we have engaged for a dozen meetings in collaboration with the Greater Vancouver Chamber. Developing a 20-year growth management plan for our evolving community would be challenging in itself. However, your efforts must adapt to new state laws particularly surrounding housing density and distribution. You also wisely utilized this cycle to update and streamline the city's comprehensive plan and zoning code. We are supportive of the resulting plan and code updates and view them as a suitable blueprint for development in the city. With that said, we urge a spirit of flexibility and adaptability as we turn the corner toward implementation. For a decade following the Great Recession, we have enjoyed favorable conditions that supported growth in the City of Vancouver. However, interest rates, inflation, tax policy, and general societal and economic conditions have caused necessary private investment to become more cautious and selective in pursuing projects in our region. Development can no longer be considered a certainty. City development policy cannot change those conditions but it can be a tool to help bring to market those projects that pencil. Delivering projects ranging from residential in-fill to multi-family or commercial/industrial developments will require a new level of public and private sector cooperation and a sense of urgency. We also appreciate city leaders' commitment to the creation of 43,000 jobs in addition to 38,000 housing units. Job generation represents the economic engine necessary to power our economy, government and community. A commitment to generating local jobs is one of the most important steps we can take to reduce vehicle miles, stimulate local business generation and strengthen the social fabric of our community. We also appreciate the recognition that generating housing especially in the lower and workforce income bands will challenge conventional thinking regarding public sector participation. We look forward to working with city leaders as planning concludes and everyone's attention shifts to the challenging work of delivering projects as projected in these plans.	Included in 4/28/2026 PC PH testimony, included in CC 4/27 testimony

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Planning Commission, Email City Council	4/24/2026	Justin W.	Government Affairs Director, Clark County Association of REALTORS	Dear Mayor McEnerny-Ogle, Mayor Pro-Tem Fox, and Councilors Paulsen, Hansen, Harless, Stober, and Perez: Vancouver has consistently been ranked as one of the most livable and desirable communities in the United States. Recently, Vancouver was ranked 14th out of 100 small to mid-sized cities for livability nationwide and *#1 among cities in the Pacific Northwest*. Our association commends city volunteers, staff, citizens, and the council for putting in the effort to enhance our community through the comprehensive plan update and changes to Title 20 within the city's code. Much of this work supports the city's goal of a more equitable, affordable, and prosperous community through 2045. Housing and more broadly, neighborhoods define a city's character and function. Our members are experts in housing markets and demand here locally, and across the metro region. Based on that expertise, we would like to share concerns and ask this body to consider minor adjustments that have come to our attention within the city's proposed updates to Title 20. **Market Demand & Detached Housing** Unequivocally, the vast majority of home buyers prefer to purchase detached housing types. This is made clear by a variety of surveys and studies, both within Washington State and nationwide. Historically, home buyers have chosen markets where detached housing is more affordable and available, especially among larger or multi-generational households. The 5,000 sq ft lot maximum lot for new development outlined in Title 20 will push homebuyers into other markets. Home buyers may choose other local markets that may provide bigger yards, off-street or garage parking, greater space between neighbors, and in some communities, a lower tax burden. In the future, home buyers may want to be in Vancouver, but simply can't find the product that fits their needs at a price point they can afford. Our association appreciates the need for both attached and detached housing types, but we must ensure Title 20 allows the development community to foster an ample supply of attached *and* detached owner-occupied housing to fit market demand. Over 30% of the growth the county will see in the next 20 years will come from folks earning at or above 120% of area median income, according to the county's growth allocation work in response to the passage of House Bill 1220. The city should consider minor modifications to Title 20 to accommodate this income group's market demand, while still being able to provide housing for middle and low income folks and preserve the city's density and land use goals. If this code goes into effect, existing home values, especially homes on larger legacy lots will skyrocket. It may create incentives working against middle housing, where high-income earners are competing for dwindling product (homes on larger legacy lots), negatively impacting redevelopment and infill housing. This is clearly displayed in some jurisdictions where the value of the home and larger legacy lot is greater in the marketplace than the whole process of redevelopment, especially given current interest rates, the cost of construction, and the lack of economies of scale on smaller infill lots. Providing an exemption from some code requirements may alleviate this market pressure. In agreement with a variety of members within our association and the broader local development community, *we recommend waiving or lowering minimum density requirements and providing lot dimension flexibility for small parcels in the low and medium-scale zones (under 0.5 acres).* This will provide greater gentle density for neighborhoods and better recognize market demand in these zones. **Housing Production** One size does not fit all, particularly for infill on irregular parcels. Many lots are constrained by circulation, setbacks, critical areas, topography, and lot shape. Waiting for the "highest and best" use through blanket upzoning may indeed worsen our housing crisis and compound the problem. High-density projects often do not get built quickly, or they convert late in the cycle, which delays supply when it is most needed. The economics of high-rise and podium construction—higher financing costs, higher per-unit construction costs, and the need for expensive ground-floor commercial build-outs—make those projects less likely to deliver affordable and attainable units. Density alone does not equal affordability; recent projects show per-door prices that are far from the attainable requirements outlined in House Bill 1220. A recent middle housing-owner occupied project off Broadway Street in Uptown Vancouver wouldn't have met the minimum density requirements under the new code. Please consider flexibility in minimum density requirements and strategic annexation or expansion of the urban growth area, as this body adopts Title 20 and the city moves through the twenty-year comprehensive plan cycle.	Included in 4/28/2026 PC PH testimony, included in CC 4/27 testimony

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				Market demand will shift as existing home prices rise and new construction increasingly targets renters and higher earners. Current land-use choices, escalating regulatory requirements, and a growing tax burden are a cause for concern for renters, home buyers, businesses, housing providers, and the development community here in Vancouver. **Tree Preservation and Landscaping Requirements- Impact on Feasibility & Affordability VMC 20.450.006** The benefits of our mature trees, vegetation, tree canopy, and open spaces are real. However, to deliver the density and urban growth that the city hopes to foster, modifications may be needed within this section of the code. • *General Requirements: "Enhanced mitigation costs of one and a half (1.5) times the regular mitigation costs are required to be paid to the City Tree Account based on the largest tree units of existing non-exempt trees permitted to be removed below the thirty-three (33%) percent preservation threshold."* Consider lowering the 33% threshold and/or use an average size of tree units of existing non-exempt trees. • *Exemptions to Standards: "Removal of trees on parcels of less than one acre in size shall be limited in proportion to six (6) trees per acre (i.e., on a half (1/2) acre parcel can remove three (3) trees)."* Consider increasing the exemption for the number of tree removals for parcels at or under 0.5 acre. • *Preservation of Existing Trees and Vegetation: "When there are feasible and prudent location alternatives on site for proposed building structures or other site improvements, existing native vegetation and trees are to be preserved, even if the* *minimum tree density and minimum tree canopy percentage is exceeded. This may require site redesign including but not limited to: redesign of streets, sidewalks, stormwater facilities, utilities; changing the shape and size of the parking lot; reducing or limiting proposed site grading; construction of buildings on pier foundations, and changing the location or reducing the number of buildings or building lots as long as the project is within the allowed density range."* Mandating location alternatives or mitigation when the preservation requirement has already been exceeded seems onerous and raises another impediment to feasibility, affordability, and housing production. **Requested actions** • Reconsider density minimums in the low and medium scale zones on parcels under 0.5 acres and pursue flexible and targeted tools that preserve projected density while enabling feasible infill on constrained lots. • Remove or relax the ground-floor commercial ceiling height requirements in certain zones and overlays, and other mandates that increase construction cost without guaranteeing long-term commercial viability. With this commercial viability issue, especially ground floor retail, the legislature is moving in the opposite direction of the city with the passage of Senate Bill 6026. • Reassess the 5,000 sq ft lot cap and other limits that make Vancouver less competitive with neighboring jurisdictions for owner-occupied housing. • Reduce requirements or provide flexibility within VMC 20.450.006- Landscaping and Tree Preservation. Consider the impact this code will have on feasibility, affordability, and the number of units delivered, especially where urban growth is supposed to occur according to GMA- within cities. Thank you for your attention to these concerns. Our association appreciates all the work the city has done to balance growth, affordability, and livability, and we urge you to adopt practical, flexible policies that produce housing now while preserving long-term planning goals for the future. Our association and its 1,900+ members are available to discuss these points further or provide examples from specific parcels and projects in the city. Sincerely,	

Source	Date	Name	Affiliation (if any)	Content	Notes
Email Planning Commission	4/25/2026	Monica Z.		Dear members of the City Council, I'm writing to you because I care deeply about what we are doing as a city. For the last couple of years, many of us have put in the work to make sure that people of color in our community aren't just "consulted" on this Comprehensive Plan, but are actually at the heart of it, especially as we work to heal the damage of past injustices. We need you to approve this plan. I know some people are pushing back because they're afraid of change or "infill," but we can't let that stop us from getting truly affordable housing. Life is all about change, and the truth is, if the system isn't working for all of us, then it isn't working. If we want a city where the people who work here can afford to live here, we have to be brave enough to build that reality. I'm asking you to transform our economic system into a model that is both ecologically safe and socially just. By staying within the means of our living planet, we can meet the needs of all people today without compromising the ability of future generations to meet their own. Let's start by changing our language. Let's stop treating "economic growth" as the only measure of success. Let's change that goal to thriving in balance with our natural systems. And let's stop saying "affordable housing" and start committing to truly affordable housing. We need to move past the idea that "affordable" is just a percentage of some median income that doesn't match our reality. We need housing that actually fits the real life survival budget of a family in our city, not some outdated federal number from the 60's. I want to see a city that can actually breathe. I'm talking about "rewilding" our neighborhoods, trading in those manicured lawns for food forests and places where pollinators can thrive. We shouldn't just "prioritize" pesticide-free zone, we need to get rid of these toxins completely. We have to do this for the health of our soil and for our children. I also want us to rethink how we make a living. Why are we still stuck in this "boss and worker bee" model? Let's support shared ownership businesses, where everyone who helps create the value gets a fair share. And let's set up a "Bioregional Finance Facility" so people who want to put their money back into our local land and ecology actually have a way to do it. Please look at the models that are already working, like social housing in Vienna or the community projects in Amsterdam. We don't have to reinvent the wheel, we just have to be willing to turn it. Please, don't just "encourage" these changes. Support them. Fund them. Require them. Let's build a city that doesn't just grow, but heals. This comprehensive plan will help us take the necessary steps to become a more equitable, more livable, more just city. I'm urging you to pass the plan. Thank you. ★ The future is not planned, it's seeded. Monica Z[last name] [phone number]	Included in 4/28/2026 PC PH testimony

Source	Date	Name	Affiliation (if any)	Content	Notes
				The videos below enriched my life. I see the world from a wider lens. I really hope you choose to watch them. 1. Doughnut Economics 7 Ways to Think Like a 21st Century Economist by Kate Raworth, 29 minute video https://youtu.be/qwyzsAWRMcw?si=Hut8czYBLqAjOBpb 2. The Superorganism Explained in 7 Minutes The Great Simplification https://youtu.be/h5VWZm7ESfk?si=PCvre3pYNXCFhhGX	

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Email City Council	4/25/2026	Monica Z.		Dear members of the City Council, I'm writing to you because I care deeply about what we are doing as a city. For the last couple of years, many of us have put in the work to make sure that people of color in our community aren't just "consulted" on this Comprehensive Plan, but are actually at the heart of it, especially as we work to heal the damage of past injustices. We need you to approve this plan. I know some people are pushing back because they're afraid of change or "infill," but we can't let that stop us from getting truly affordable housing. Life is all about change, and the truth is, if the system isn't working for all of us, then it isn't working. If we want a city where the people who work here can afford to live here, we have to be brave enough to build that reality. I'm asking you to transform our economic system into a model that is both ecologically safe and socially just. By staying within the means of our living planet, we can meet the needs of all people today without compromising the ability of future generations to meet their own. Let's start by changing our language. Let's stop treating "economic growth" as the only measure of success. Let's change that goal to thriving in balance with our natural systems. And let's stop saying "affordable housing" and start committing to truly affordable housing. We need to move past the idea that "affordable" is just a percentage of some median income that doesn't match our reality. We need housing that actually fits the real life survival budget of a family in our city, not some outdated federal number from the 60's. I want to see a city that can actually breathe. I'm talking about "rewilding" our neighborhoods, trading in those manicured lawns for food forests and places where pollinators can thrive. We shouldn't just "prioritize" pesticide-free zone, we need to get rid of these toxins completely. We have to do this for the health of our soil and for our children. I also want us to rethink how we make a living. Why are we still stuck in this "boss and worker bee" model? Let's support shared ownership businesses, where everyone who helps create the value gets a fair share. And let's set up a "Bioregional Finance Facility" so people who want to put their money back into our local land and ecology actually have a way to do it. Please look at the models that are already working, like social housing in Vienna or the community projects in Amsterdam. We don't have to reinvent the wheel, we just have to be willing to turn it. Please, don't just "encourage" these changes. Support them. Fund them. Require them. Let's build a city that doesn't just grow, but heals. This comprehensive plan will help us take the necessary steps to become a more equitable, more livable, more just city. I'm urging you to pass the plan. Thank you. ★ The future is not planned, it's seeded. Monica Z[last name] [phone number]	Included in 4/27/2026 CC testimony

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Email Planning Commission	4/26/2026	Miriam H.		Dear Planning Committee Members, I am supportive of the new Comprehensive Plan, with one caveat. At least one cherished store on Main Street has gone out of business in great part due to the length of time customers found access to the store highly inconvenient and very confusing during the upgrades. I refer to Center Stage Clothiers. I spoke to the owner who explained that she could not get sufficient sales in time once the street work had completed to recover from the loss of sales while the lengthy work was in progress. The loss of this store is problematic because the next closest store that can outfit school plays and other local theater with costumes is all the way in Beaverton Oregon. This is a hardship for our schools and local theater. Therefore, I ask that careful planning occur to ensure that customers are able to access businesses easily while the work is being done. At the least, please ensure that disruption of business occurs for shorter periods of time. One last request: Should my comments be made public, please do not include my street address, as I need privacy from current and former clients. Thank you very much for your consideration. Sincerely,	Included in 4/28/2026 PC PH testimony

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Email Planning Commission	4/27/2026	Tom P.		It's very difficult for one person to contradict the 313 page Comprehensive Plan and 908 page Land Use and Development Code. Obviously a lot of of forces have been at work to put this together over the past few years. I suspect that most residents of Vancouver are still unaware of the details. New state law requires allowing at least four dwelling units per lot in single family zones (P. 119). However, Vancouver is proposing to rezone for much higher density that what the state requires. I wish that the city had sent a letter to every single-family homeowner about the proposed new zoning for their property, letting them know that their neighborhood (48 percent of the housing units) will be open to at least three-story apartments if not five-story. You may well be hearing from the single-family residents, in the future. This plan is a disrespectful slap to the thousands of homeowners who have worked hard to create a nice home and yard, only to be told that they are a problem because more they're occupying too much space. I wonder how much of this plan is hopeful musings. Will a bunch of neighborhood grocery stores appear to challenge Winco, Safeway, Fred Meyer, Wal-Mart and Costco because of a planning document? I hope that the city goes back to the drawing boards and significantly reduces the zoning densities. Thanks for the chance to comment.	Included in 4/28/2026 PC PH testimony

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Email City Council	4/27/2026	Ben M.	Vice President, Northwest Neighborhood Association	To the City Council, My name is Ben M[last name], the Vice President of the Northwest Neighborhood Association and I live at [address]. I'm writing on my own behalf to encourage you to place the Northwest Neighborhood entirely within the Low Scale Neighborhood designation. The Environmental Impact Statement for the City of Vancouver's proposed comprehensive plan update stands on two pillars: "anticipated changes under the action alternatives would occur incrementally" and "property owners decide if and when changes occur." These two assurances are used to handwave away concern ranging from redeveloping historically designated properties with maximum infill (p. 104), the environmental impact of max densification in environmentally sensitive areas (P. 93), max densification having a negative impact by allowing investment corporations to bid against first-time homeowners or prey or senior citizens to put pressure on them to redevelop their property (Page 234) or the possibility of max infill overwhelming infrastructure and causing significant impacts on utilities and emergency services (P. 162). The Environmental Impact Statement for the proposed comprehensive update states that "intense development is focused in specific areas like urban centers and corridors." While I would love to see a thorough analysis of the impact 75-foot buildings would have on wildlife, green spaces and more in the EIS, I'll leave those efforts to environmental organizations and land use attorneys tackling individual projects in the future. However, when the misnamed "Medium Scale" is applied to previously low density areas we're no longer looking at simple increased densification as intended by the new state requirements, we're looking at "intense development" and ensuing intense impacts on the environment, on infrastructure, and in the ability of the public and wildlife to access critical green spaces that are now walled off behind wood, concrete and glass. The city handwaves these concerns away by saying all changes would be "incremental." But the pace of change is something beyond the City's control We see this with the current environment. The city saw less than 50% of it's housing target constructed this year – not because of lack of effort, incentive or land, but because of external forces like the economy, tariffs, and materials and labor costs. External forces don't just disappear because the city projects impacts will be "incremental" In the Preferred alternative, the city projects that its designated zones will yield 44,000 housing units over the life of the plan. The city's target is 38,000. Moving the Northwest Neighborhood entirely into Low Scale would have next to no impact on the city's goals. Instead of embracing the use of potentially destructive Medium Scale zoning in neighborhoods such as Northwest that cannot logistically handle growth at that level, I would encourage you go embrace smart growth and the true "middle housing" intended by the legislature and return the Northwest Neighborhood to the Low Scale Neighborhood designation. I've seen mixed messages from the city on why the neighborhood was placed partly in Medium Scale. On one hand, any compromises to the medium scale zoning have been rejected because "they would be too restrictive to what developers could do." And I've been told that the neighborhood had to be included in medium scale due to equity concerns and because "developers do not take down new 1.5-million-dollar homes to make multi-family housing they take down older homes" – homes where the residents don't have the wealth or resources to fight back. On the other hand, I'm told intense development "Probably won't happen" in our neighborhood anyway. If that is true, then moving the neighborhood back to Low Scale would have no practical impact on the city's projected yields or targets. However, if the goal is to encourage private equity, and mega development corporations to bid for land and homes against first time homebuyers and senior citizens for property and cut out the "middle" of middle housing, then leave the plan as is. I want to see increased growth and more density in my Neighborhood - we absolutely need it - but I also want to see it done in a smart way that is both pro-people, pro-housing accessibility and pro-upward mobility. I would encourage you to choose people over private capital, senior citizens over sovereign wealth funds, middle housing over the mega rich, and smart *development* over wealthy *developers* and place the Northwest Neighborhood entirely back in the Low Scale Neighborhood designation. Thank you for your time and your consideration. Sincerely,	Included in 4/27/2026 CC testimony

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Email Our Vancouver	4/27/2026	Tatiana O.		My friends and I were wondering if they are or can be plans for more farmland saved, whether it's livestock like sheep, or food like broccoli. I do live community gardens and so I wish there was more wild food gardens and trees are so big that they can be shared. I was recently in la and saw lemon and lime trees. I just think space for trees to grow up and wide is important, places for bees and butterflies, space for houses and apartments to have gardens, since we need oxygen to breathe and food to live. Maybe more fish in river if we can do more fishing so more fisheries. And I've just been wondering where recycling goes, I feel like each place needs an industry they excel at, didn't we use to do paper.. So sorry if you have to read a lot of similar notes, but I hope they do help! Ty!	Staff replied 4/30/2026
Email City Council	4/27/2026	Ted S.		I urge you to vote to approve the comprehensive plan. As Vancouver continues to grow, we must continue to add house, which means increasing density. Increased density is a good thing, because that makes transit more cost effective, plus allows for neighborhoods to support local businesses. Thank you,	Included in 5/11 CC testimony
Email City Council	4/27/2026	Kyle H.		Hello, I just wanted to send in a brief bit of support in favor of the new comprehensive plan. I've lived in Vancouver (Rose Village) for 6 years now and have loved seeing how the city is developing. I've reviewed many details of the comp plan and have attended a few meetings to learn more about it. I see this plan as a great start to Vancouver's future. With added density and options for zoning that will allow housing and businesses in areas that need them, this city will be more walkable and businesses will benefit from the ease of access. Thanks for taking the time to read!	Included in 5/11 CC testimony

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Email Planning Commission	4/28/2026	Marlece W.		Dear Planning Commission Members, I am writing to express a significant concern regarding the current draft of the Our Vancouver Comprehensive Plan. While the document is presented as a roadmap for the future of the entire city, there is a noticeable lack of specific inclusion and detailed planning for all of Vancouver's distinct neighborhoods. A "Citywide" plan should, by definition, be representative of the diverse geographic and social landscape of our community. However, the current draft appears to prioritize certain high-growth corridors while leaving others—particularly established residential areas and marginalized sectors—without clear strategies for local improvements, equity, or infrastructure. Specifically, I would like to highlight the following: • Incomplete Scope: The plan outlines "Big Ideas" and "Comprehensive Goals" (such as those in Chapter 8: Transportation and Mobility), yet fails to demonstrate how these will be applied equitably across every neighborhood boundary. • Gentrification and Risk: As noted in the draft's own "Displacement Risk Typologies," many of our neighborhoods are at high risk. Without specific, localized protections and investment plans for every district, this plan risks accelerating displacement rather than preventing it. • The "Our Vancouver" Promise: The title implies a collective future. For this plan to be truly successful and legitimate, it must explicitly address the unique needs, historical contexts, and "Environmental Health Disparities" of all neighborhoods, not just a select few. I urge the Commission to pause and revise the draft to ensure that no neighborhood is left as an afterthought. We need a plan that truly reflects the "Our Vancouver" vision by including every corner of our city in its maps, goals, and funding priorities. Thank you for your time and for considering the voices of all Vancouver residents. Sincerely,	Included in 4/28/2026 PC PH testimony

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Email Planning Commission	4/28/2026	Mary K.		**April 28, 2026, Vancouver, Washington** **City Planning Commission public hearing** Thank you for the opportunity to comment on the proposed comprehensive plan update. After considerable study, I find that the proposed update is not fair to city residents as currently drafted. It puts too much pressure on existing neighborhoods by pursuing overly aggressive goals. This is not necessary to manage growth responsibly and respect the need for housing. The city has disregarded the state's medium 20-year forecast for population. Likewise, it has disregarded Clark County's determination that the forecast calls for 36,527 new homes and 26,317 new jobs in Vancouver by 2045. Instead, the city established goals for 38,000 new homes and 43,200 new jobs. Taking this approach even further, the city created and analyzed planning scenarios that promise more building capacity than needed to meet its own inflated targets. Three out of four alternatives offer the potential for many more homes and jobs than even the city thinks we need, according to the Final Environmental Impact Statement. The "Preferred Alternative" would make way for 44,111 dwellings and 45,145 new jobs. Vancouver is directing all its growth into today's city limits, putting excessive pressure on residents and, potentially, on taxpayers. Meanwhile, the draft plan skates over the question of how the city and county will work together to shape and manage capacity for the urban growth area. *Right now, they don't even agree on what "numbers" to plan for to comply with state law. And, they don't agree on how much capacity the city's proposal would create for new homes in the city.* 0ne sentence of the FEIS (Page 69) says the city and county will facilitate orderly annexations to mitigate adverse impacts from monumental upzoning. But annexations are difficult, expensive and slow. Consistent city and county planning in the uga must happen regardless of when annexations occur, because growth has been in progress for many years and is likely to continue apace. Before long, the proposed plan may have negative impacts on the uga. The demand and price for homes north of the city are likely to increase as people search for more relaxed environments. Important opportunities for planning may slip away quickly. We are seeing examples of that today, with Oregonians moving to Clark County to escape downsides of metropolitan Portland. That might help explain why we are growing and other counties have stalled out. If we are serious about preparing for the next 20 years, we must devise an equitable and effective plan for increasing the supply and variety of housing throughout the urban area, while containing the cost if possible. That requires good use of at least part of the uga, to prevent undue strain in the city as the plan becomes reality.	Included in 4/28/2026 PC PH testimony

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Email Planning Commission	4/28/2026	Serena L.	Chair, Columbia Neighborhood Association	Livability--per Vancouver strategic plan: 2023-2029 I am reaching out as a longtime Neighborhood Leader in East Vancouver--Columbia River NA. I know we are at the end point to adopt the City of Vancouver's 20 year growth plan to take us through 2045. Background: I was born and raised in San Jose, California. I am a third generation native. My grandfather owned a prune orchard in South San Jose. My father who grew up on this orchard would often comment, "Silicon Valley is built on the some of the best farmland in the world and should be located in Redding, California, where they can not grow a stick". Through a promotion and job transfer for my husband, we moved to Vancouver, Washington in 1996. We built our home off East Evergreen Highway. I left my career and have used my experience and managerial skills to advocate and improve this area in East Vancouver. I worked with Roger Parson's --who has since moved to S. California. The reason I bring up San Jose is my experience from the their growth. "Between 1960 and 1990, San Jose transformed from a mid-sized agricultural town into a major tech capital, with its population skyrocketing from 204, 196 to 782,248. Driven by the rise of Silicon Valley and aggressive annexation, the city the land area significantly and surpassed San Francisco as the most populous city in the bay Area by 1990. Like my father, I watched the city change--safety and security as a little girl evaporated. Traffic and congestion and the influx of people and changes to the landscape tremendous. I rode my bike for years at great distances until I was 15. As the city grew it was no longer safe to ride. San Jose has installed bike lanes across the city--no one uses them as it is simply not safe to do so--too many deaths have been recorded. Trash is everywhere as is tagging. To many other priorities to focus on these efforts. I understand we are not at this level, though the rate we are growing is considerable. The safety once felt when my husband and I and our two little girls moved to Vancouver, WA in 1996 is in the past due to growth. I have asked why we are required to have the current level of growth for the next twenty years-2045. The answer from our former City Manager, Erik Holmes and Mayor Anne is that people want to move here. In order to continue to make the City of Vancouver a desirable place to live, is to ensure the quality of life for its current residents. Ensure the impacts to the city take into consideration the concerns of those who currently live here, or they will leave the city, as is occurring today along the west coast. Livability per the Strategic Plan 2023-2029 "Livability is about supply and access to basic necessities, quality of life, requirements and experiences that everyone in Vancouver expects. Livability means that every resident and cultural group can live in the community with a sense of belonging and pride while maintaining their own values, beliefs, and identities". The city annexed Evergreen Highway in 1996. A comprehensive plan (Corridor Management Plan), for Evergreen Highway was adopted by the City Council in 2016. Today, the remaining portion of the plan has been placed on the back burner--a safe walking/biking trail. Asphalt paving Evergreen Highway was part of this plan. The paving project was behind the original five year plan for various reasons. The 6.7 miles of Evergreen Highway asphalt paving project was completed in September of 2025. This vision for Vancouver, Washington. A safe place to walk, bike or wait for a school bus applies to all residents in the City of Vancouver. It should be noted that Evergreen Highway has a bicycle connector to the 205 bridge. Today it is dangerous for many in east Vancouver to navigate Evergreen Highway due to no safe biking/walking trail.	Included in 4/28/2026 PC PH testimony

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				Please note the number two bullet point on page nine for livability: Clean public spaces, sidewalks and streets.	

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Email Planning Commission	4/28/2026	Ben M.	Vice President, Northwest Neighborhood Association	To the Planning Commission, My name is Ben M[last name], the Vice President of the Northwest Neighborhood Association and I live at [address]. I'm writing on my own behalf to encourage you to place the Northwest Neighborhood entirely within the Low Scale Neighborhood designation. The Environmental Impact Statement for the City of Vancouver's proposed comprehensive plan update stands on two pillars: "anticipated changes under the action alternatives would occur incrementally" and "property owners decide if and when changes occur." These two assurances are used to handwave away concern ranging from redeveloping historically designated properties with maximum infill (p. 104), the environmental impact of max densification in environmentally sensitive areas (P. 93), max densification having a negative impact by allowing investment corporations to bid against first time home owners or prey or senior citizens to put pressure on them to redevelop their property (Page 234) or the possibility of max infill overwhelming infrastructure and causing significant impacts on utilities and emergency services (P. 162). The Environmental Impact Statement for the proposed comprehensive update states that "intense development is focused in specific areas like urban centers and corridors." While I would love to see a thorough analysis of the impact 75-foot buildings would have on wildlife, green spaces and more in the EIS, I'll leave those efforts to environmental organizations and land use attorneys tackling individual projects in the future. However, when the misnamed "Medium Scale" is applied to previously low density areas we're no longer looking at simple increased densification as intended by the new state requirements, we're looking at "intense development" and ensuing intense impacts on the environment, on infrastructure, and in the ability of the public and wildlife to access critical green spaces that are now walled off behind wood, concrete and glass. The city handwaves these concerns away by saying all changes would be "incremental." But the pace of change is something beyond the City's control We see this with the current environment. The city saw less than 50% of it's housing target constructed this year – not because of lack of effort, incentive or land, but because of external forces like the economy, tariffs, and materials and labor costs. External forces don't just disappear because the city projects impacts will be "incremental" In the Preferred alternative, the city projects that its designated zones will yield 44,000 housing units over the life of the plan. The city's target is 38,000. Moving the Northwest Neighborhood entirely into Low Scale would have next to no impact on the city's goals. Instead of embracing the use of potentially destructive Medium Scale zoning in neighborhoods such as Northwest that cannot logistically handle growth at that level, I would encourage you go embrace smart growth and the true "middle housing" intended by the legislature and return the Northwest Neighborhood to the Low Scale Neighborhood designation. I've seen mixed messages from the city on why the neighborhood was placed partly in Medium Scale. On one hand, any compromises to the medium scale zoning have been rejected because "they would be too restrictive to what developers could do." And I've been told that the neighborhood had to be included in medium scale due to equity concerns and because "developers do not take down new 1.5-million-dollar homes to make multi-family housing they take down older homes" – homes where the residents don't have the wealth or resources to fight back. On the other hand, I'm told intense development "Probably won't happen" in our neighborhood anyway. If that is true, then moving the neighborhood back to Low Scale would have no practical impact on the city's projected yields or targets. However, if the goal is to encourage private equity, and mega	Included in 4/28/2026 PC PH testimony

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				development corporations to bid for land and homes against first time homebuyers and senior citizens for property and cut out the “middle” of middle housing, then leave the plan as is. I want to see increased growth and more density in my Neighborhood - we absolutely need it - but I also want to see it done in a smart way that is both pro-people, pro-housing accessibility and pro-upward mobility. I would encourage you to choose people over private capital, senior citizens over sovereign wealth funds, middle housing over the mega rich, and smart development over wealthy developers and place the Northwest Neighborhood entirely back in the Low Scale Neighborhood designation. Thank you for your time and your consideration.	
Email City Council	4/28/2026	Eric P.		Hello there, I am a Vancouver resident but was unable to attend tonight's city council meeting I would like to voice my support for the comprehensive plan for the city. It is a forward thinking plan that encompasses many features that will improve access to infrastructure, adjust zoning to relax constraints on housing, and improve connectivity throughout the city. I urge the council to approve the plan and look forward to the process of implementing the key features in the future Kind regards,	Included in 5/11 CC testimony

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Mail City Council	4/29/2026	Sharon F.		Dear City Leader, This is a request regarding the 7.5-acre proposed "Mt. Hood Vista" site in my Parkway East neighborhood on NE 34th Street. I understand the city's need for additional housing, while balancing the needs of current property owners To that end, I encourage the City to approve the building of 9.5 homes per acre (70 total), rather than the proposed 11.2 per acre (82 total) at this particular site. This request still exceeds proposed density requirements of the new Comp Plan's "low-scale" zone, which will require only a minimum of 59 unattached, ingle-family homes on the site. (The area is currently zoned R9, limiting it to roughly that same number). Increased traffic -- *more than 600 extra cars per day!* -- in this **infill** neighborhood - located on a residential neighborhood circulator street rather than a higher traffic throughway - will be dangerous for current and future residents of both Parkway East and Parkside Neighborhoods, who often walk, jog, cycle, skateboard, and drive on our neighborhood streets. I also request to preserve on of the few remaining small groves of environmentally-protective and iconic Douglas firs adjacent to public rights of way in Parkway East, located in the northeast corner of this 7.5-acre lot. *This is doable with just a slight reduction of lots from the 82 currently proposed*. Please hear us, and act in the best interests of your current constituents in Parkway East and Parkside neighborhoods, as well as the new residents we'll be welcoming! Thank you,	Included in 5/11 CC testimony

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Form City Council	4/29/2026	Ellen S.		***In recent decades, thousands of trees have been removed in connection with private development projects taking place in Vancouver. In one recent example near my home, a development project called Fircrest Landing (located just south of NE 18th St, east of I-205) removed all but 4 of 148 mature Douglas Firs trees-an outcome that was permissible under current tree code since that code only requires tree retention "where feasible." ***Vancouver officials anticipate the city's population will reach 268,000 by 2042, an increase of about 40 percent from the 2020 Census. The city is revising its Comprehensive Plan, for possible adoption on June 1, 2026 to manage growth and associated environmental effects for the next 20 years--in a manner that is consistent with the Washington State Environmental Policy Act. The updating of this plan will include proposed amendments to zoning regulations relating to trees and landscaping. In other words, those amendments will impact how many trees must be retained in any given development. There is a push for increased housing density to accommodate anticipated growth. Greater density within smaller parcels can translate to more housing units on a given parcel and hence fewer trees retained and less space available in which to add trees. Accordingly, unless the current tree code is amended to require the retention of a certain percentage of existing trees within a given development project (if that retention rate does not prevent reaching the minimum density range for the underlying zone), it is quite likely that most developers will conclude tree retention is not "feasible" at all, especially on smaller parcels on which greater density is permitted. ***The Urban Forestry Commission has recommended updates to the Comprehensive Plan to more closely align that plan with pre existing city plans that recommend elevating the environment/tree canopy. Those plans include the Tree Canopy Assessment Study (2021), the Climate Action Plan Framework (2022), the Urban Forestry Management Plan (2023), and the City's 2025 Stormwater Management Program Plan. ***Our city's current code on tree retention (providing for tree retention within a private development only "where feasible") is plainly out of date and in no way promotes the more recently adopted 28% city-wide canopy cover target set forth in the City's Urban Forestry Management Plan. Amendments to the Comprehensive Plan, consistent with those recommended by the Urban Forestry Commission, will enhance tree removal requirements on private property, bolster tree replacement requirements, and revise landscaping standards to ensure long term canopy health. ***Vancouver does not need to choose between increased housing density or trees. Other communities have chosen both and Vancouver can too.	Included in 5/11 CC testimony
Email City Council	5/1/2026	Jean A.		https://clbn.us/ZMB1G To City leaders: This news is shocking and disheartening! Removing trees for wide sidewalks and cement walls? What is happening to our beautiful city?	Included in 5/11 CC testimony