



Friday, October 13th, 2023

City of Vancouver Planning Commission
Attn: Chair Ledell and Vancouver Planning Commission Members
415 W 6th Street
Vancouver, WA 98660

Subject: Proposed Warehouse Code Amendments

Dear Chair Ledell and Planning Commission members:

Thank you for the opportunity to comment on the City's proposed warehouse code amendments in response to the original moratorium enacted on December 12th, 2022, and extended in June of 2023. The Port of Vancouver USA has appreciated the opportunity to talk with City staff to better understand the purpose of the moratorium and to provide input into workable solutions to address staff and Council's concerns. Regarding the staff's proposed recommendations listed in the September 12th, 2023, Planning Commission memorandum, the port has the following comments:

1. Allowance of warehouses larger than 250,000 square feet only in Heavy Industrial (IH) zoning as a limited use.

Recommendation: While most of the port's land is already zoned IH, the port requests to retain flexibility in its Light Industrial (IL) zoned properties that are not adjacent to residential zoned land and that are within one mile of a state or interstate highway. The port's marine / industrial area is focused on receiving, staging and transloading cargo from one mode to another. It is conceivable that future development could require a warehouse facility exceeding 250,000 square feet.

The port appreciates the recognition that a limited use process is more appropriate than a conditional use in IH zones for the type of project under consideration. There are, however, few parcels, such as the port's Parcel 7, which are appropriately zoned as IL and could accommodate a large warehouse without generating the negative impacts of concern in the moratorium. Without favoring the port specifically, the city may consider requiring large warehouses in the IL zones to be located within a certain distance to a state or interstate highway and to be a certain distance away from residential or other zones of concern.

2. Clarification on “warehouse” versus “Warehouse / Freight Movement”

Recommendation: The memo refers to both “warehouses” and “Warehouse / Freight movement.” This should be clarified by referring only to “Warehouse / Freight Movement” as outlined in the current VMC (Vancouver Municipal Code). There are different warehouses defined in the VMC, but the focus is on one warehouse class (“Warehouse / Freight Movement”).

VMC 20.160.D. Industrial Uses classifies “Warehouse/Freight Movement” as:

“5. Warehouse/Freight Movement. Uses involved in the storage and movement of large quantities of materials or products indoors and/or outdoors; associated with significant truck and/or rail traffic. Examples include freestanding warehouses associated with retail furniture or appliance outlets; household moving and general freight storage; food banks; cold storage plants/frozen food lockers; weapon and ammunition storage; major wholesale distribution centers; truck, marine and air freight terminals and dispatch centers; bus barns; grain terminals; and stockpiling of sand, gravel, bark dust or other aggregate and landscaping materials.”

Defining code changes only to the “Warehouse/Freight Movement” use defined above focuses the proposed code changes to developments that results in “significant truck” traffic. Additionally, ensuring that code changes are specific to “Warehouse / Freight Movement” would still allow “Manufacturing and Production Facilities” to be developed in both light and heavy zones areas.

VMC 20.160D defines “Manufacturing and Production” development separately from “Warehouse / Freight Movement”:

Manufacturing and Production. Includes production, processing, assembling, packaging or treatment of semifinished or finished products from raw materials or previously prepared materials or components. Manufacturing production is intended for the wholesale market rather than for direct sales.”

3. Limitation of truck traffic from Warehouse / Freight Movement to Designated Freight Corridors

Recommendation: Change the proposed wording in 20.895.120.B. Traffic (Page 5 of Memo) to the below:

Tractor trailers delivering goods to or from “Warehouse / Freight Movement” covered by this section shall only travel on designated freight corridors.

This recommendation removes the specific reference to named roads and allows the City the opportunity to designate freight corridor restrictions (which could include Fruit Valley Road) throughout the city as necessary, which may change over time.

4. Buffer depth and tree planting requirements

Recommendation: The City should change the buffer depth requirement (proposed 20.895.120 section C.2) from 25 feet to 15 feet, and clearly state that any tree requirement required in proposed 20.895.120 Section D can be planted in the landscaped buffer area. At developer's discretion, allow any tree requirement to be completed at an approved off-site location.

This requirement should also be reconsidered if the project's environmental assessment can mitigate wildlife, water retention and climate impacts in other ways if necessary. The port suggests removing the required area (20% of the building area) from the tree planting requirements.

Increasing the setback to 25 feet AND requiring an additional 20 percent of the building footprint area to be covered by trees significantly impacts the financial viability for a development project so burdened – especially since the proposed code would also restrict development to 75 percent of the project area or less. Without the recommended changes outlined above, the site reduction (100 to 75 percent), landscape buffer (currently 25 feet), and tree plantings (20 percent of building footprint) will make large scale warehouses – whether they are freight related or manufacturing related – extremely difficult to construct.

The Port does not have space in its marine operations area to limit required marine facilities to the proposed “maximum lot coverage of 75 percent” versus the current 100 percent allowed. Additionally, it would not be appropriate or effective to require the port to plant trees in its marine industrial areas.

Allowing the planting of trees offsite, when onsite tree planting is deemed impractical, will also allow developers to use any tree credits they may have or to buy tree credits if needed.

Additionally, reducing the landscape buffer to 15 feet would improve traffic safety – especially as site lines would be obscured as the plantings mature.

5. Trip generation for Warehouse / Freight Movement facilities exceeding 250,000 square feet

Recommendation: Add a traffic metric (such as 100 tractor trailer trips per 24-hour period) in addition to the use and size criteria for “Warehouse / Freight Movement”

facilities exceeding 250,000 square feet to invoke the additional miscellaneous special use standards of proposed in VMC 20.895.120.

Adding a traffic count to the “Warehouse / Freight Movement” use category for proposed warehouses of at least 250,000 square feet would provide a clear metric that both developer and city can understand when applying these code changes. This metric would come from a traffic consultant paid for by the developer.

6. EV outlets at loading docks

Recommendation: Restate 20.895.120 Section D. 6 as outlined below:

All loading docks will have conduit and other electrical infrastructure to allow for future installation of electrical systems to charge electric powered freight trucks servicing the facility.

The port supports and is pursuing electrification within our adopted Climate Action Plan. As currently proposed, however, the port has concerns that underutilized, charging infrastructure would be prone to costly vandalism and theft. Developers would rather have the conduit in place to meet future demands and standardization with the technology in place at that time. Requiring developers to install full charging infrastructure will result in capital wasted as newer and more secure electrical technologies emerge.

7. EV charging stations for parking area

Recommendation: Restate 20.895.120 Section D.7 as outlined below:

For any warehouse over 250,000 feet at least 10 electric vehicle (EV) charging stations will be provided at initial occupancy. Conduit to support EV charging will be constructed to serve all parking spaces at initial occupancy.

Designating a specific number of parking stalls to have EV charging stations (10) meets the City’s goal to have adequate EV charging installed during initial construction. Requiring conduit to be placed for the remainder of the parking stalls allows for future upgrades to occur efficiently as EV’s capture more of the market and anti-vandalism solutions can be developed.

8. Calculation of Total Square Footage

Recommendation: The ordinance should clearly state that the threshold of 250,000 square feet applies to any single structure on a given site, and not the total square footage of multiple separate structures or facilities.

Thank you for your consideration of the Port of Vancouver USA's feedback and recommendations. We look forward to continuing to work with Council and staff throughout this process to ensure an outcome that addresses the City's concerns and continues to responsibly advance trade and economic development within the City of Vancouver and throughout the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Bomar". The signature is fluid and cursive, with the first name "Mike" and last name "Bomar" clearly distinguishable.

Mike Bomar

Port of Vancouver USA, Director of Economic Development