

MACKENZIE.

October 24, 2023

City of Vancouver

Attention: Chad Eiken, Community Development Director and Bryan Snodgrass, Principal Planner
415 W. 6th Street
Vancouver, WA 98660

Re: City of Vancouver Warehouse Code Amendments

Dear Mr. Eiken and Mr. Snodgrass:

Please accept the following letter as our written comments to the proposed warehouse code amendments, specifically City of Vancouver zoning code section 20.89.120 (Warehouses Larger than 250,000 square feet) as outlined in your October 2, 2023, memorandum to the City Council.

20.895.120.C. – Visual Impact. Item #1 and #2. Generally, measures like façade articulation and landscape buffers relate to certain types of roads or adjacent non-industrial zoned areas. No language as it relates to adjacent non-industrial zoned areas is included and the scoping provision for a public street does not provide latitude for an exception for low volume side streets.

20.895.120.C.1 – Architectural elements. The paragraph does not provide guidance for the applicant and the City planners on the “why” of the provisions. Providing guidance on City goals will provide the developer with a stronger framework to provide excellent architecture and landscape design solutions; and provide staff tools to guide its approval process.

20.895.120.C.2 – A sixty-foot-high wall of conifer trees introduces a visual barrier restricting an Owners legitimate desire to provide a site that utilizes Crime Prevention Through Environmental Design (CPTED) concepts (safety/security design measures). A closed off site works against CPTED concepts that aim to reduce victimization, deter offender decisions that precede criminal acts, and build a sense of community among inhabitants so they can gain territorial control of areas, reduce crime, and minimize fear of crime. We recommend consideration of a “street tree “approach (deciduous) trees, low berms and low shrubs which provide visual access into the property for occupant, visitor, and premise safety. In addition, it is in the public’s interest to allow sufficient visual access to the site to allow wayfinding to both autos and trucks seeking to access a particular site. If the frontage is totally obscured by evergreen trees, additional traffic may be added to adjacent streets due to visitors failing at initial approach to recognize and/or access the property promptly.

20.895.120.D.1 – We strongly recommend the City not provide additional solar panel language or requirements. The State Building Code - current version 2018 and the soon to be adopted 2021 version - have strong and very detailed Renewable Energy provisions. Refer to Section C411. The language provided in the state Code is detailed and beyond what has been provided in the memorandum. Adopting this language would add unnecessary confusion to this issue.

20.895.120.D.2 – We strongly recommend the City not provide additional skylight/clerestory window language or requirements. The State Building Code - current version 2018 - has provided a strong framework for this climate measure and is maintained in the soon to be adopted 2021 version. It is a strong and very detailed daylighting provision. Refer to WAC 51-11C-40232, Section C402.4.2 Minimum skylight fenestration area. The language provided in the State Code is detailed and beyond what has been provided in the memorandum. Adopting this language would add unnecessary confusion to this issue.



20.895.120.D.4 – How will engine idling be enforced? How would this provision be addressed within the Site Plan Review process?

20.895.120.D.5 – The technology for charging electric powered trucks is changing rapidly. The electrical load/demand is significant. This requirement places a huge financial burden on the developer of new warehouses for technology that may be outdated or not even used by future tenants. Additionally, the electrical utility company may not be able to meet the power demands of this requirement.

20.895.120.D.6 – EV charging. We strongly recommend the City not provide additional EV Charging language or requirements. The State Building Code - current version 2018 - has provided a mild framework for EV Vehicle charging infrastructure and the requirements are significantly increased in the soon to be adopted 2021 version. It is strong and configured into three tiers: 10% EV charging stations, 10% EV-Ready spaces, and 10% EV-Capable spaces. Refer to WAC 51-50-0429 Section 429—Electric vehicle charging infrastructure. The language provided is beyond what has been provided in this memorandum. Adopting this language would add unnecessary conflicting language to this issue.

We look forward to providing verbal testimony at the October 24, 2023, Planning Commission meeting.

Sincerely,



Brett Conway
Associate Principal



Michael Chen
Associate Principal