

October 24, 2023

Alliance for Community Engagement (ACE)

City of Vancouver Planning Commission

Dear Chair Ledell and Planning Commission,

Thank you for your ongoing work with the Warehouse Moratorium. Alliance for Community Engagement submitted a list of concerns and questions about the Draft Warehouse Moratorium to the Planning Commission and the Community Development Team. Yesterday we received a memo from Chad Eiken addressing ACE's concerns and the Port of Vancouver's concerns. While ACE still has concerns, we appreciate being allowed to comment on this important policy, and thank the Community Development Department for communicating with us about it.

ACE is concerned that this Warehouse Moratorium is a missed opportunity to meaningfully reduce greenhouse gas emissions in keeping with our ambitious Climate Action Framework goals.

The threshold of 250,000 square feet for considering warehouse code changes has had a determinative effect for all warehouses under that threshold. We find it problematic that a 249,999 sq. ft. warehouse or smaller simply has no climate expectations to meet, considering that the City has a city-wide carbon-neutrality goal of 2040.

We understand the Green Building/Policies Standards don't yet exist. But delaying climate measures for all warehouses under 250,000 sq. ft. until the Green Buildings Standards are established creates a policy gap that misses a decisive moment to curb greenhouse gas emissions. The same is true for the current lack of requirements that heat pumps be used exclusively for space and water heating in warehouses.

The Community Development Staff responded in its Oct. 23 memo that they were not proposing climate requirements for warehouses under 250,000 sq feet in order to be consistent with the Moratorium. However, the Moratorium is not the only City Council directive. City Council policies go beyond warehouses, and the goal of those policies is to aggressively reduce emissions community-wide by 2030. In the Council meeting on Oct 23, Council expressed concern about the lack of data visualization that shows where the City is at currently in reducing emissions, versus where the City should be at to meet impending emissions reduction goals. Council also asked for a continued sense of urgency about those deadlines.

ACE suggests that the Planning Commission recommend that new buildings should NOT generate greenhouse gas emissions. The City's goal is to reduce emissions.

ACE also recommends that the Planning Commission revise the warehouse size threshold and apply it to *groups of buildings that exceed 250,000 sq. ft. in a single development application*. Otherwise warehouse developers are likely to use this loophole to avoid climate measures the City should implement.

Questions about the data:

ACE wonders what data City planning staff used to make their recommendations. For example, is there any evidence that planting trees elsewhere actually offsets the environmental impacts of lots of pavement, truck traffic and a very large building? A cluster of small buildings would produce even more pollutants and heat mass than one mega building, as more concrete and steel would be used in construction.

Similarly, was any environmental analysis done of the impacts of a 250,000 sq. ft. warehouse, compared to a slightly smaller one (or a cluster of smaller ones, or of locating more heavy industry in an existing IH zone compared to spreading IH out across the city. If not, what justifies this arbitrary 250,000 sq. ft. cutoff?

Other concerns:

- Solar cells on warehouse roofs would shade the buildings, thereby reducing heat and cooling energy costs.
- All tree plantings required of the largest warehouses should be located on site.
- Neither the site plan review process (Type II Action) nor the SEPA review process offer nearly as much public engagement process as Conditional Use Permitting would.

Thank you for:

- The requirement for EV conduit/wiring and double-paned clerestory windows.
- Maintaining Fruit Valley Road Neighborhood as a high priority equity area, and naming Fruit Valley Road as a freight corridor that does not need more truck traffic.
- Banning idling for non-electric truck engines.
- Not rezoning parts of the City to Heavy Industrial to accommodate the largest warehouses.
- Maintaining a 25 ft. tree buffer on the largest warehouses

Lack of clarity:

ACE is looking for clarification on if/how climate measures can/will be applied to new warehouses after these code changes pass with this Warehouse Moratorium.

- Will there be Interim Green Building/Policies Standards applied for warehouses smaller than 250,000 sq. ft.?
- Is there a meaningful distinction between the land use policy permits and building permits? How do these permit processes affect new warehouses?

As the City continues to implement new policies, every effort should be made to incorporate actions that reflect the urgency of achieving emissions reductions to meet the goals and deadlines established by the Climate Action Framework. Tonight the Planning Commission's question to itself should be: are your recommendations to Council consistent with the Council's policy goal of reducing emissions? The current draft Warehouse Moratorium seems to be a missed opportunity to operationalize our Climate Action Framework. Thank you for your consideration, and for your work.

Sincerely,
Alliance for Community Engagement (ACE)