

# Pleasant Highlands Neighborhood Association

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September 30, 2006

Ref: Draft EIS for the CGMP for Clark County, August 2006

Clark County Department of Community Development  
Attention: Marty Snell, Long Range Planning Manager  
P.O. Box 9810  
Vancouver, WA 98666-9810

Subject: Comments on the Comprehensive Growth Management Plan 2006  
Proposed Alternatives for Clark County

Dear Mr. Snell:

Thank you for allowing us the opportunity to comment on the Comprehensive Growth Management Plan (CGMP) 2006 Update for Clark County. It is gratifying to live and work in a Community whose leaders value and respect the local perspective and insights of those most-directly affected by proposed government decisions. We strongly believe that by working together, the people and government of Clark County can craft a plan which will better serve the needs of our expanding populace, while preserving the values we cherish, and which make Clark County one of the good places to live, to work, and to raise our families. It is to that end, that we submit this Letter of Comment for your consideration and that of the Board of County Commissioners (BoCC).

On the whole the County Planning Staff is to be commended for producing a sufficiently-thorough evaluation of the impacts of the three proposed growth alternatives that even where mistakes in judgment have occurred, the DEIS supplemented by other government publications provides sufficient information to make that evident and to suggest appropriate corrective actions that we feel is the case with some proposed land uses and zoning changes within the boundaries of this Neighborhood Association.

And since the DEIS makes it clear that none of the Proposed Alternative Growth Plans as presently defined is feasible, due to funding shortfalls, most especially with regards to required Transportation Improvements, we earnestly hope that our suggested changes to Alternative Growth Plans 2 and 3 will be incorporated within the Preferred Alternative. We have given this matter much thought and believe we have found a better arrangement of land uses within our Neighborhood Association boundary, which will provide the land needed for Jobs where near-term planned and funded road improvements can be made use of, maximizing use of scarce County economic resources while minimizing adverse impacts to existing residential neighborhoods, quality of life and property values.

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Pleasant Highlands Neighborhood Association (PHNA) has a number of quite specific concerns regarding **Alternative Plans 2 and 3**. These Plans currently propose rezoning of the Philbrook Farms agricultural property east of NE 50<sup>th</sup> Avenue and south of NE 139<sup>th</sup> Street to Commercial and Mixed Use. Previous testimony and comments from PHNA stated that the lands north of NE 119<sup>th</sup> Avenue and south of Salmon Creek Street between NE 50<sup>th</sup> Avenue and NE 72<sup>nd</sup> Avenue should be zoned residential with the lowest density beginning at NE 50<sup>th</sup> Avenue and transitioning to higher densities approaching NE 72<sup>nd</sup> Avenue. We strongly believe that any Commercial or Mixed Use development will better serve our area at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street for the following reasons, which will be discussed in some detail herein :

- 1. Appropriate and Transitional Zoning.** Locating Commercial and Mixed Use developments at the SE corner of NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street would allow transitional increasing housing density moving east from the low density residential neighborhoods along NE 50<sup>th</sup> Avenue, precluding problems there due to inappropriate and incompatible land uses permitted within overly broad zoning categories.
- 2. Better Conformance with BoCC Principles and Values.** As shown herein, Alternative Plans 2 and 3's proposed Commercial and Mixed Use at NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street would satisfy relatively few of the Board's stated evaluation criteria, especially as compared with those same developments being sited along NE 72<sup>nd</sup> Avenue at NE 119<sup>th</sup> Street.
- 3. Minimize Environmental Impact on Salmon Creek Watershed and Critical Underground Water Resources.** We are concerned about the potential negative impact on the sensitive Salmon Creek Watershed. Those of us who elect to live out away from the City center do so for many reasons, including our love and respect for the County's dwindling natural environment. The impact of the inevitable conversion of the presently agricultural lands at NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street to other uses when they are brought within the Urban Growth Boundary will be minimized if that conversion is to Low-Density Residential rather than Commercial or Mixed Use.
- 4. Better Use of Existing and Planned and Funded Improved Transportation Corridors.** In order to actually make use of lands designated Commercial or Mixed Use for essential purposes of generating substantial numbers of local family-wage Jobs, the lands must be situated on roads which are either presently planned for expansion sufficient to accommodate increased traffic flow at a major Commercial and Mixed Use hub, or which can be added to the Planned Transportation Improvements at reasonable cost. As we will show, Commercial and Mixed Use at NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street fails both tests, while similar land use at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street can make use of in-progress and cost-effective Transportation Improvements.
- 5. Appropriately Extends and Supports Focused Public Investment Area.** NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street is at the Northern end of the Barberton Jobs Center Focused Public Investment Area. Substantial Commercial and Mixed Use developments at that location can thus leverage off of the in-progress Transportation Improvements and other County initiatives making the Barberton Jobs Center a reality, rather than locating such developments at NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street which would dilute County Job creation investments.
- 6. Preserving Livability of Existing Residential Neighborhoods.** As some of the more desirable and sought after established single-family housing developments with family-size lots, maintaining the present livability standards is important, important to those of us who live here and to the County. It is crucial that developments of the magnitude allowed by the sheer size of the developable land east of NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street be compatible with current quiet Residential land use.

**7. Satisfy Preferences of Present Residents and Home Owners.** For the reasons stated herein and numerous others, PHNA residents and home owners, as well as the present owners of the developable properties at issue prefer Low Density Residential Housing at NE 50<sup>th</sup> Avenue, transitioning to gradually-increasing density housing up to Jobs-creating Commercial and Mixed Use along NE 72<sup>nd</sup> Avenue, especially at NE 72<sup>nd</sup> Avenue and NE119th Street.

The Pleasant Highlands Neighborhood Association is not anti-growth; far from it. But we do believe strongly that growth must be appropriately constrained and directed, lest improper and unnecessary costs, monetary and otherwise, be incurred in meeting County goals, and that focused local perspective can be revealing. To that end, the remainder of this letter provides our detailed critique of Proposed Alternatives 2 and 3 and their impacts on our Neighborhood Association and the County.

## **1. PHNA COMMENTS ON ALTERNATIVES 2 AND 3 WITH RESPECT TO APPROPRIATE & TRANSITIONAL ZONING.**

The area west of NE 50<sup>th</sup> Avenue between Salmon Creek Street and NE 119<sup>th</sup> Street is primarily upscale, low-density residential, including all proposed developments currently on hold due to the Salmon Creek Moratorium. This is a highly desirable area for residents and maintaining the area's livability is very important. Alternative Plan 2 and 3's proposed allocation of the property's on the East side of NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street for large-scale Commercial and adjacent Mixed Use development preclude any meaningful transitional zoning with respect to those Residential land uses, unless a substantial amount of the land nominally-available for Commercial development is dedicated to such transitional zoning.

On the other hand, Zoning for Low-Density Residential housing beginning east of NE 50<sup>th</sup> Avenue with increasing densities approaching NE 72<sup>nd</sup> Avenue is in our opinion appropriate, transitional zoning for this area, and would permit full development of allocated Commercial and Mixed Use lands for those purposes along that increasingly important County arterial roadway..

- There should be no abrupt transitions in land use. Low-Density Residential (4-5 units per acre), transitioning to Medium Density Residential (6-8 Units per Acre), transitioning to higher density multifamily Residential, Mixed Use and Commercial along established regional arterials is more in keeping with residents' expectations and leads we believe to a naturally-harmonious blending of land uses and life styles.

Although many people living throughout the County would appreciate the convenience of proximate Neighborhood Shopping Areas, for groceries, dry cleaning services, and the like, that is not true of those of us who by choice live outside or at the present Urban Growth Boundaries. To the contrary, we value our peace and quiet, low traffic volumes, clean air, low crime rate, relative safety, and the rural charms of the natural environment around us. The absence of Neighborhood Commercial services is considered a major plus by residents of the PHNA. Such shopping areas are not needed or desired in all neighborhoods and in this area in particular, and could be better located.

- Commercial and Mixed Use development at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street, would better suit the needs of more residents in the County, that being a far more appropriate location, one which is actually "on the way" to/from work for many PHNA area residents, and one which will likely become more so as the road improvements south of NE 119<sup>th</sup> Street are completed over the next couple of years.

And while considerable progress has been made in cleaning up the County Code, more work must be done before we could in good conscience advocate either Commercial or Mixed Use zoning adjacent to

any Residential Neighborhood like those adjacent to and near NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street. Present County Code zoning categories are still much too broad. Many of the uses under Mixed Use and Commercial zoning are simply incompatible with adjacent established upscale neighborhoods in this area.

- Many permitted (P) uses listed under Commercial and under Mixed Use Zoning are incompatible with uses in the existing neighborhood.
- Many conditional (C) uses are inappropriate under any circumstances. Also CUP conditions and restrictions may not be adhered to by the County if circumstances change, as illustrated by the present problems with Amphitheater traffic (please see Attachment 1 to this Letter, Commercial and Mixed Use Zoning, for highlighted examples of uses we would find unacceptable within this Neighborhood Association).

The Board of County Commissioners lack discretionary powers within zoning areas. Until or unless there is some mechanism whereby land uses which are in general permitted under a given Zoning (most especially Commercial, Mixed Use, or Industrial) are constrained, automatically or on appeal to the Commissioners based on adjacent land uses, prudence dictates that Neighborhood Associations treat all Zoning changes as if the worst-possible land use under that proposed Zoning is what is going to be developed.

Finally, and a point to which we will come back in our discussion of necessary Transportation Improvements and Capital Facilities to fund same, we note that the area at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street falls within the nascent Barberton Jobs Center area (please see Attachment 2), where supporting infrastructure is already being planned, funded, and put in place for Commercial, Mixed Use, and Industrial developments.

## **2. PHNA COMMENTS ON ALTERNATIVES 2 AND 3 WITH RESPECT TO MEETING BOCC PRINCIPLES AND VALUES.**

Alternative 2 - Area 4 – (2-4) includes **Commercial** and **Mixed Use** zoning at the SE corner of NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street. In our opinion such use poorly reflects the BoCC Principles and Values against which, in-part, the Alternative Growth Plans are to be evaluated. Here we will address a number of issues with the Principle or Value as it is applied under Alternative 2 and under Alternative 3-V4. The salient issues raised within the DEIS, largely in Table 3 in that document, are as follows:

- **Table 3/pg 15. Job lands close to transportation so that capacity is provided to job opportunities:** Alternative 2 indicates it meets this BoCC principle or value. It does not as NE 50<sup>th</sup> Av. and NE 139<sup>th</sup> St. need major road improvements to accommodate the increase in traffic for such a zoning. Both roads are currently rural 2 lane roads with ditches on either side of the road with at least one line of sight issue that needs to be resolved. A more logical placement of any Commercial zoning would be along already established thoroughfares (i.e. NE 72<sup>nd</sup> Av, SR 501, etc.).
- **Table 3/pg 15. Ground-truth where residential and jobs “make sense”.** Alternative 2 indicates it meets this BoCC principle or value. The proposed zoning for the property located on the northeast corner of NE 50<sup>th</sup> Av and NE 139<sup>th</sup> St is Commercial on the corner and the property due east is Mixed Use. Given the need for major road improvements previously mentioned, the zoning for this location does not “make sense.” Residential zoning of R1-20 or R1-10 would be the logical choice to fit with the surrounding and adjacent neighborhoods.

- **Table 3/pg 15. Ensure good geographic distribution of commercial lands.** Alternative 2 indicates it meets this BoCC principle or value. This may be true for the majority of Alternative 2 however it is not for the property located on the northeast corner of NE 50<sup>th</sup> Av and NE 139<sup>th</sup> St. that has a proposed zoning of commercial and mixed use. The lack of improved roadways, increased traffic that would be generated, and the proximity to the Pleasant Valley School complex would all lead to an unnecessary burden to the surrounding community and a hazard to those students who walk to school along the unimproved roadway.
- **Table 3/pg 16. Prioritize lands that are most likely to provide “family-wage jobs” as defined in the comprehensive plan policies.** Alternative 2 indicates it meets this BoCC principle or value. That may be true for the majority of Alternative 2 however it is not true for the property located on the northeast corner of NE 50<sup>th</sup> Av and NE 139<sup>th</sup> St. which has a proposed zoning of Commercial and Mixed Use. Lands that will support family wage jobs need to have easy access and are not community friendly when placed in the middle of a large residential area.
- **Table 3/pg 16. Ground-truthing is extremely important for employment.** Alternative 2 indicates it meets this BoCC principle or value. That may be true for the majority of Alternative 2, however it is not true for the property located on the northeast corner of NE 50<sup>th</sup> Av and NE 139<sup>th</sup> St. that has a proposed zoning of commercial and mixed use. The selection of this property for commercial and mixed use is an indication that County staff has not visually examined the site. Additionally, this zoning makes no sense due to the existing rural roads and the subsequent monetary expenditures necessary for improvements and the potential for harm to the Salmon Creek Watershed.

The next 3 Principles or Values identified in the DEIS indicate a work in progress.

- **Table 3/pg 17.** Need creative opportunities for communities (e.g. for based zoning, performance zoning). Alternative 2 indicates the BoCC principle or value is a work in progress.
- **Table 3/pg 17.** New growth needs to blend well with existing neighborhoods. Alternative 2 indicates the BoCC principle or value is a work in progress.
- **Table 3/pg 17.** Identify school sites inside the new residential areas. Alternative 2 indicates the BoCC principle or value is a work in progress.

It is unclear to those of us reviewing and commenting on the DEIS, just how the BoCC expects citizens to comment on an incomplete document. It is unacceptable to expect comment when it is not known what the Community Development team’s position will be. As illustrated in our preceding comments, some Community Development Staff conclusions as to the extent to which the Proposed Alternatives conform to the stated BoCC Principles and Values are questionable. From the 10,000 foot County-wide planning perspective, Staff conclusions may be reasonable. From the focused feet on the ground perspective of those intimately familiar with local conditions and concerns, many are not.

On page 24, one of the most crucial BoCC Principles or Values, from the Residential Neighborhood perspective, is stated as follows: “**Blend new growth with existing neighborhoods (i.e., transition zones, buffering, gradual transitions in development style, type).** Alternative 2, Area 4 where **Commercial and Mixed Use** zoning has been placed on the SE corner of NE 50<sup>th</sup> Avenue and 139<sup>th</sup> Street does not and cannot do this and is an inappropriate zoning for the area. Zoning land adjacent to established residential neighborhoods to incompatible zoning categories as proposed for this area would endanger the health and quality-of-life of the citizens who live in this area, based on numerous negative environmental factors including traffic, pollutants, odors, and noise. Additionally, the increased traffic on unimproved rural roads will create a hazard to pedestrians and bicyclists.

As stated earlier, the work “In progress to meet BoCC principle or value” designation equates with the DEIS being an incomplete document and one which is not as “fully baked” as it could be and needs to be to serve its intended purpose. The decisions to be made by the BoCC are too important and far-reaching to permit them to be hamstrung by inadequate public comment on incompletely-defined Alternative Growth Plans.

Alternative 3 (Area V4) reflects urban low density residential East of NE 50<sup>th</sup> Avenue and North of NE 139<sup>th</sup> Street, and we are in support of that proposed zoning. This area currently consists of homes on large parcels, usually five (5) acres or more. Even though there are several Principle or Values identified that do not meet BoCC standard because they deal with commercial zoning, jobs, or family wage jobs, we believe the proposed zoning is the correct choice.

### **3. PHNA COMMENTS ON ENVIRONMENTAL IMPACTS OF ALTERNATIVE 2 AND 3 SUB-AREAS ON THE SALMON CREEK WATERSHED AND CRITICAL UNDERGROUND WATER RESOURCES**

#### **Executive Summary**

The Pleasant Highlands Neighborhood Association (PHNA) is concerned about the potential negative impact on the sensitive Salmon Creek Watershed. Salmon Creek has already endured significant growth related degradation, perhaps more than any other Clark County waterway. Clark County Public Works and Clark Public Utilities have invested a significant amount of money and effort to mitigate for, or prevent further sedimentation, erosion, and pollution of this stream. Specifically, PHNA believes that creating a large Commercial and Mixed Use hub at the corner of 50<sup>th</sup> Ave and 139<sup>th</sup> Street would greatly negate any progress made, and would be a final and significant blow for what was once an amazing fish passage and habitat corridor.

#### **Endangered Species Act and the effects of Impervious Surfaces**

The listing of Lower Columbia River runs of steelhead and Chinook salmon as threatened under the Endangered Species Act (ESA), requires special protection for their habitat in the streams of Clark County. Due to its present state of degradation, Salmon Creek no longer supports Chinook salmon, however, it does provide habitat for Steelhead and Coho salmon. The DEIS (page 34, sec 10) states that Salmon Creek would suffer additional degradation along with 5 other already degraded streams under Alternative 2.

NOAA Fisheries recommends limits on impervious surfaces (such as roads, parking lots and roofs) to 5 or 10% of the total watershed as a salmon protection measure. When total impervious surfaces exceed 5 to 10%, aquatic habitats are adversely affected due to increased storm water runoff and reduced groundwater infiltration and vegetative cover. Cumulative effects will be significant, since aquatic and terrestrial habitat areas within the Salmon Creek basin have already been negatively impacted by previous development projects. While the DEIS' description of the significance of impervious surfaces and their impacts are accurate as far as it goes, the final EIS should expand on the explanation of the negative impacts of impervious surfaces on habitats, and groundwater recharge areas. Unfortunately, both Alternative 2 and Alternative 3 add substantial negative impacts to the Salmon Creek Watershed.

Figure 1 is Table 3-5 from the Clark Public Utilities - Salmon Creek Watershed Assessment – October 2002. The table indicates that significant degradation does not occur until Total Impervious Area (TIA)

reaches 20 percent, which is equivalent to about 10 percent Effective Impervious Area (EIA). As one can see, the high density and commercial types of development create the most impervious areas, and therefore the most habitat and watershed damage.

**Table 3-5. Estimated Relationship Between Imperviousness and Land Use.**

*From Dinicola (1990).*

Land Use	TIA (%)	EIA (%)
Low density residential (1 unit per 2-5 acres)	10	4
Medium density residential (1 unit per acre)	20	10
Suburban density residential (4 units per acre)	35	24
High density (multi-family or 8+ units per acre)	60	48
Commercial and Industrial	90	86

**Figure 1. Impervious Surface Areas as a Function of Land Use**

Impacts to climate change from impervious areas are significant as well. As stated in *Table 2 from the Assessment : Summary of Mitigation*, "Choosing an alternative that converts the least amount of undeveloped vegetated areas to impervious surfaces and reduces vehicle emissions through more efficient development are available forms of mitigation to avoid impacts to climate".

It should also be noted that it is much easier and less expensive to preserve habitat than it is to recreate it. This should be a consideration of some importance given the limited financial resources available to cope with anticipated growth within the County

#### Sole Source Aquifer Impact Mitigation via Impervious Surface Minimization

With the EPA designation of the Troutdale Aquifer, which supplies most of Clark County's drinking water, a "sole source", consideration should be given to reducing impervious surfaces, such as those created with high density development. Washington State SEPA guidelines, section 8.4.2 states:

*A GMA city identifies a sole source aquifer that is their primary source of potable water. To mitigate the impacts of dense development on recharge of the aquifer, the city minimizes the amount of impervious surface over the aquifer by designating a lower density of residential development and limiting the width of residential streets. When a subdivision is proposed that is consistent with the designated density and street widths, the city can determine that the project's impacts on the aquifer's ability to recharge have been addressed with respect to building density.*

#### **Resource Lands**

The Washington State Growth Management Act provides that resource lands, such as farm and forestland, should be avoided in setting urban growth areas. Preservation of open spaces such as farmland can provide much needed breaks from urban densities and also reduce concentrations of impervious surfaces within a given area. Alternative 2 and Alternative 3 include large impacts to resource lands as well as bring the Vancouver UGA very close to the planned expansion of Battle Ground's UGA.

### Land Use Constraints

Both Alternatives 2 and 3 (with the exceptions of Sub-Areas V5 and W2) allocate industrial lands with significant environmental constraints. Of what value are large tracts of land with constraints, unless it is being implied that those constraints will be removed with environmentally impacting conversions such as wetland filling and habitat destruction?

### **Conclusions**

The PHNA in conjunction with the Salmon Creek Watershed Council (please see their Letter of Comment on Environmental Impacts of Alternatives 2 and 3 on the Salmon Creek Watershed, Attachment 3 to this Letter), urges the commissioners to adopt a plan that recognizes the potential impacts to what remains of Clark County's natural environment, and works to preserve and enhance those areas that are important from a habitat and water quality perspective, and add value to, or at least maintain the overall quality of life here. PHNA urges the BoCC to take action and adopt the following measures (outlined as additional mitigation measures which could be adopted to reduce potential impacts on surface and ground Water, on page 34, line 45 of the DEIS):

- Select a growth pattern that minimizes the urban footprint and directs growth away from wetlands, stream corridors, and shorelines.
- Prohibit development involving impermeable surfaces in flood hazard zones unless required for a water-related use, resource land management (consistent with the Forest Practices Act), or development beneficial to the public which could be appropriately mitigated.

### **4. PHNA COMMENTS ON ALTERNATIVES 2 AND 3 WITH RESPECT TO USE OF EXISTING OR PLANNED AND FUNDED TRANSPORTATION CORRIDORS.**

Commercial development should be located along existing or more-readily expanded transportation corridors, consistent with planned and funded road improvements. Major developments should not be planned where logical or necessary access is via roads not in the current Transportation Improvement Plans. If property allocated to Commercial and Mixed Use is to serve its intended purpose as a local Jobs Center, it must be located where there are good connections to high-volume roadways, or where such connections can be created with minimal difficulties. Given the proximity of the properties at NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street to Salmon Creek Street and adjacent residential land uses, and the existence of better alternatives such as NE 72<sup>nd</sup> Avenue, that criteria is not met by the proposed Commercial and Mixed Use designations for those properties under Alternatives 2 and 3.

Due to local geography and the Residential zoning applied to adjacent properties, those admittedly otherwise quite large and attractive parcels simply cannot practically be developed as the envisioned major Commercial and Mixed Use hub and Jobs Center for this part of the County.

Attachments 4-6 illustrate one of the major obstacles to transforming NE 50<sup>th</sup> Avenue from the Rural Collector (2 lanes, 1 each way, paved, no shoulders, turn lanes, sidewalks or bicycle lanes) into the Minor or Principal Arterial (2-4 lanes, 1-2 each way, center turn lane, shoulders, sidewalks, and bicycle lanes on each side) which logically would be required to properly service the major Commercial and Mixed Use hub and Jobs Center proposed under Alternatives 2 and 3.

- There is the 70 foot difference in elevation just north of the Schools and that at Salmon Creek Street, along with the sharply curved path down to the narrow bridge across Salmon Creek and the 300 plus foot break in the continuity of NE 50<sup>th</sup> Avenue across Salmon Creek Street.

- And though it is certainly physically possible to so improve NE 50<sup>th</sup> Avenue, it would be expensive (very expensive), would still be restricted in speed adjacent to the Schools during School hours, and would not provide as direct a link to the Interstate Freeways as presently in-progress road improvements will provide to the properties at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street.

We believe it is those considerations, especially the monumental expense which would be involved in providing the necessary road improvements which has pushed any planned expansions of either NE 50<sup>th</sup> Avenue or NE 139<sup>th</sup> Street far into the future.

As shown in the following Tables, excerpted from Clark County Community Planning Brochure 4929 9.06 (*Checking in on Our Future, Where Do We Grow from Here?, Clark County, Washington, Revised Comprehensive Growth Management Plan, Draft environmental Impact Statement, Open Houses September 2006*), listing all Road Improvements affecting Alternative 2 or 3 land use proposals within this Neighborhood Association, there are no plans for or funds committed presently to provide the necessary Transportation Improvements required to make a major Commercial and Mixed Use hub work at the proposed location.

- Neither road appears in either the 6 year Transportation Improvements Plan listings for 2006-2011 or in the present Capital Facilities Plan projects list for 2012-2023.
- Planned improvements to NE 50<sup>th</sup> Avenue are limited to the segment between LaLonde Drive (NE 99<sup>th</sup> Street) and NE 119<sup>th</sup> Street. And that not in the near-term Transportation Improvements Plan projects list for 2006-2011 which have some odds of surviving budgetary limitation realities, but in the more nebulous and uncertain to be fulfilled Capital Facilities Plan projects list for 2012-2023.

**Table 1. Transportation Improvement Program projects 2006-2011** (excerpted from Section C, Road Improvements Table, in *Checking in on our Future*)

These are the county's official priorities adopted through an annual public process.

PROJECTS	FROM	TO
NE 72 <sup>nd</sup> Ave	N of NE 88 <sup>th</sup> St	NE 110 <sup>th</sup> St
NE 88 <sup>th</sup> St	St. Johns	Andresen
NE St Johns Rd	NE 50 <sup>th</sup> Ave	NE 72 <sup>nd</sup> Ave
NE 88 <sup>th</sup> St	Hwy 99	St Johns Rd
NE 99 <sup>th</sup> St	NE 72 <sup>nd</sup> Ave	NE 94 <sup>th</sup> Ave
NE 119 <sup>th</sup> St	Salmon Creek Ave	NE 72 <sup>nd</sup> Ave
NE 72 <sup>nd</sup> Ave	NE 119 <sup>th</sup> St	NE 133 <sup>rd</sup> St
NE 119 <sup>th</sup> St	NE 72 <sup>nd</sup>	NE 117 <sup>th</sup> Ave
NE 179 <sup>th</sup> St	E of Union Ave	NE 50 <sup>th</sup> Ave

Source: *Checking in on our future; Where do we grow from here? Clark County, Washington, Revised Comprehensive Growth Management Plan, Draft Environmental Impact Statement, Open Houses September 2006*

**Table 2. Capital Facilities Plan projects 2012-2023** (excerpted from Section C, Road Improvements Table, in *Checking in on our Future*)

These are the county’s projects called for in the Comprehensive Growth Management Plan adopted in 2004.

PROJECTS	FROM	TO
NE 50 <sup>th</sup> Ave	LaLonde Dr	NE 119 <sup>th</sup> St
Andresen/Padden	Interchange	
NE 179 <sup>th</sup> St	NE 50 <sup>th</sup> Ave	Cramer Rd
NE 99 <sup>th</sup> St	St. Johns Rd	72 <sup>nd</sup> Ave

Source: *Checking in on our future; Where do we grow from here? Clark County, Washington, Revised Comprehensive Growth Management Plan, Draft Environmental Impact Statement, Open Houses September 2006*

Within the DEIS, there appears to be something of a disconnect between Jobs-centric land use goals and the Transportation infrastructure presently in place and the improvements required to accommodate those goals. In part, we believe that is a matter of Capital Facilities limitations (which will be addressed at some length in the next Section of this Letter) and in-part it appears due to a breakdown in communications between those working on land use allocations and those working on Transportation issues.

In Part VII, Section B, Subsection 1 of the DEIS, Impacts to Roads and Highways, it is stated that under both Alternatives 1 and 2 (and by extension Alternative 3) NE 72<sup>nd</sup> Avenue from NE 119<sup>th</sup> Street to NE 219<sup>th</sup> Street and NE 50<sup>th</sup> Avenue from Salmon Creek Street to NE 179<sup>th</sup> Street will be at poor or failing levels of service. Under Alternative 2, a section of NE 50<sup>th</sup> just south of NE 179<sup>th</sup> Street would experience substantially higher traffic levels and lower levels of service than under alternative 1.

Under Alternative 3, there would be increased traffic on Salmon Creek Street, NE 50<sup>th</sup> Avenue, and NE 72<sup>nd</sup> Avenue. The DEIS further notes that although Salmon Creek is designated a Minor Arterial, environmental constraints precluded it being built to that standard in the vicinity of WSU and would likely be a factor in any expansion further east as well. More troubling, the DEIS states that under Alternative 3 NE 50<sup>th</sup> Avenue, designated as a Rural Collector between Salmon Creek Street and NE 119<sup>th</sup> Street, would likely **carry arterial levels of traffic**.

Tables 3-5 following, are excerpted from the DEIS. In Table 3, and in the Attached Maps from the DEIS (Attachments 7-9) and the earlier more-detailed Map of the Comprehensive Growth Management Plan Transportation Level of Service in 2024 and the PHNA-specific excerpt from that earlier Map (Attachments 10 and 11), we see first that while NE 72<sup>nd</sup> Avenue will properly be part of the Regional Highway System, it will experience poor to failing levels of peak hour service. NE 50<sup>th</sup> Avenue will not have been improved beyond the Rural Collector it is now, although it will be experiencing poor to failing peak hour levels of service north of Salmon Creek Street and just north of NE 119<sup>th</sup> Street.

- From this, as well as from the lack of mention of need and cost to improve its bridge across Salmon Creek in Table 70 of the DEIS, we conclude that the recommended action in Table 69 of the DEIS (Excerpt Table 5 herein) to *Add the Segment of NE 50<sup>th</sup> Avenue from NE 119<sup>th</sup> Street to NE 179<sup>th</sup> Street to the County Capital Facilities Plan*, to mitigate level of service traffic problems in the NE 50<sup>th</sup> Avenue Corridor from Salmon Creek Street north to NE 179<sup>th</sup> Street is a typo. And that

what as intended was to add improvements to NE 50<sup>th</sup> Avenue from Salmon Creek Street to NE 179<sup>th</sup> Street. It is hoped this discrepancy will be corrected in the Final EIS.

**Table 3. Major Transportation Corridors: Estimated LOS, Alternatives 1 and 2** (excerpted from DEIS Table 67)

Corridor Segment	Alternative 1	Alternative 2
I-5, 99th to 134th	D	D
72nd Avenue, 119th to 219th Street	E/F	F
179th Street, I-5 to 72nd Ave.	-	-
Andresen/Padden/88th Street vicinity	E/F	F

Source: Clark County Department of Assessment and GIS, 2005

**Table 4. Capacity Project Needs by Alternative** (excerpted from DEIS Table 68)

Corridor Segment	Alt. 1	Alt. 2	Alt. 3
<b>Rural and Inter-urban Corridors</b>			
NE 72nd Ave, 119th to 219th St	X	X	X
<b>Vancouver UGA</b>			
Andresen/Padden/NE 88th St area	X	X	X
Salmon Creek Ave, NE 134th St to NE 50th Ave	X	X	X
NE 50th Ave, Salmon Ck to NE 179th St	X	X	X

Source: Clark County Department of Assessment and GIS, 2005

**Table 5. Proposed Transportation Mitigation Measures** (excerpted from DEI Table 69)

Corridor Segment	Proposed Mitigation
<b>Rural and Inter-urban Corridors</b>	
NE 72nd Ave, NE 119th to 219th St	Designate and construct as rural arterial
<b>Vancouver UGA</b>	
Andresen/Padden/NE 88th St area	Constrained corridor; over-capacity even with build out and new interchange; identify and evaluate new corridor options in 50-Year Trans. Visioning Process
Salmon Creek Ave, NE 134th St to NE 50th Ave	Constrained corridor; make safety improvements as needed and evaluate new corridor options in 50-Year Transportation Visioning Process
NE 50th Ave, Salmon Ck to NE 179th St	Add 119th to 179th segment to County CFP

Source: Clark County, 2006

The bottom line to all of this is that NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street would require major road improvements to accommodate any Commercial or Mixed Use development, and no such improvements are planned for the foreseeable future. Additionally, any such road improvements would be incompatible with the existing neighborhood.

Road improvements are already planned, funded, and scheduled for NE 72<sup>nd</sup> Avenue and St. Johns Avenue south of NE 119<sup>th</sup> Street. Improvements to NE 119<sup>th</sup> Street east and west of NE 72<sup>nd</sup> Avenue are scheduled to follow in a few years. By making appropriate use of these already in-progress major Transportation improvement projects, Transportation improvement costs for a Jobs Center in this vicinity would be substantially reduced by putting Commercial and Mixed Use at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street.

Commercial development should be located along existing or more-readily expanded transportation corridors, consistent with planned and funded road improvements. No major developments should be planned where logical or necessary access is via roads not in the current Transportation Improvement Plans.

**5. PHNA COMMENTS ON ALTERNATIVES 2 AND 3 WITH RESPECT TO APPROPRIATELY EXTENDING AND SUPPORTING FOCUSED PUBLIC INVESTMENT AREAS.**

**Appropriately Extends and Supports Focused Public Investment Area**

As we have made clear by now, we greatly favor placing Commercial and Mixed Use Jobs-creating land uses along NE 72<sup>nd</sup> Avenue, specifically at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street, the northern end of the Barberton Jobs Center Focused Public Investment Area. We do so not solely because doing so moves those land uses away from what we consider an unwelcome and unwarranted intrusion of

discrepant land use into the heart of our Residential Community, but because we believe it is the right thing for the County to do, especially from the monetary perspective.

As is well known, the County has limited funds to cope with the manifold impacts of its ongoing growth process. Excess Residential land uses do not pay for themselves and preserving developable lands for the slower to build Jobs-producing land uses which can pay for themselves and are necessary to make up the immediate shortfall for Residential land uses is challenging.

We thus do not fault the Community Planning Department or the BoCC for the Capital Facilities shortfalls documented in the DEIS, but we must make note of them and consider them to be further evidence that the County simply cannot afford to expend scarce funds on unnecessary infrastructure improvements which are driven by decisions to locate major Commercial and Mixed Use developments where massive additional outlays of Capital will be required to provide necessary improvements. If the County was awash in cash, with more than sufficient liquid funds to finance all projects on its books and on the horizon, the situation might be different, but it is not.

Per the sobering numbers presented in Tables 72 and 73 the County budget shortfall to cover Transportation Costs out to 2024 ranges from 71.6 to 130.9 Million Dollars under Alternative 1 (9.4 to 17.9% of projected Total Capital Costs), of which 98.5 to 124.4 Million is for proposed Traffic Impact Mitigation projects. Under Alternative 2 the numbers do not improve, with a budget shortfall of 83.7 to 147.4 Million Dollars (12.1 to 19.5% of the total Capital Costs for Transportation), of which 117.4 to 147.9 Million is for proposed alternative 2 Traffic Impact Mitigation projects. No numbers are given in the DEIS for Alternative 3 Transportation Costs, which are considered roughly equivalent in its costs to Alternative 2.

Now for the interesting part: of those Mitigation project Costs, Table 70 in the DEIS discloses that 31.2 to 38.2 Million of those Mitigation Costs will be for the comparatively straightforward widening of NE 72<sup>nd</sup> Avenue and its bridge, while widening of NE 50<sup>th</sup> Avenue (with no mention of Bridge improvements, and hence presumably covering only the segment from Salmon Creek north to NE 179<sup>th</sup> Street) will be 18.9 to 23.4 Million Dollars. Those are not inappreciable sums, and the costs to widen NE 50<sup>th</sup> Avenue from NE 119<sup>th</sup> Avenue to Salmon Creek and to connect it to the northern extension of NE 50<sup>th</sup> Avenue on the north side of Salmon Creek especially the costs associated with so bridging Salmon Creek cannot be less, and could easily be twice those required for the NE 72<sup>nd</sup> Street improvements.

In addition, NE 50<sup>th</sup> Avenue and NE 139<sup>th</sup> Street as Rural Collectors or local streets, have more than a few properties along them with houses not far from the existing narrow road edges. The costs associated with moving those houses and the diminution of those properties, or the demolition of said houses and the condemnation of those properties would add substantially to the costs of improving those roads to the extent necessary to adequately service the proposed Commercial and Mixed Use hub and Jobs Center at NE 50<sup>th</sup> Avenue and NE 119<sup>th</sup> Street.

And such improvements would be necessary. After all there is no point to creating a Jobs Center if it doesn't in-fact produce the requisite Jobs. On the face of it, allocating lands at NE 72<sup>nd</sup> Avenue and NE 119<sup>th</sup> Street for Commercial and Mixed Use at the northern end of the Barberton Jobs Center has got to be more cost effective. Plus doing so would serve to enhance the County's focus on that important Focused Investment Area.

Since there are insufficient funds presently to implement either Alternative 1, 2, or 3, it is hoped the foregoing will be taken into consideration in developing a viable Preferred Alternative, and one which does not adversely impact our Neighborhood Association.

## **6. PHNA COMMENTS ON ALTERNATIVES 2 AND 3 WITH RESPECT TO PRESERVING THE LIVABILITY OF THE EXISTING RESIDENTIAL NEIGHBORHOODS.**

Many of us within the PHNA area moved into this part of the County quite deliberately, because we value peace, quiet, reasonable freedom-from-crime, clean air, trees, grass, and nature, with a reasonable commute to work and services—that over the advantages of living right next to where we work and shop. A number of PHNA residents had the opportunity to be within easy walking distance of work and shopping when we moved into the PHNA area, but eschewed that by design.

This is one of the most desirable residential areas in which to live in the Vancouver metro area. Commercial and Mixed Use development would have a negative impact on the neighborhood at the proposed location reducing the quality of life in the neighborhood, with potential negative impacts on residential property values.

- Commercial and Mixed Use development under Alternative Plans 2 and 3 would bring in additional traffic, noise, and pollution to the area, which is presently out-of-the-way to get to for many residents in the area. A major Commercial and Mixed Use hub and Jobs Center here would change all of that, and not to the benefit of the current residents and home owners, who do not want to live near such developments and have no desire to be forced out of our homes to find again what we will have lost. Many in this area are retired or near to it and those who work do so elsewhere with little likelihood of their places of business relocating to the new Jobs Center.
- We are concerned with potential impacts to the nearby Pleasant Valley Elementary and Middle Schools. We are especially concerned with the probable reduced Safety of our children traveling to and from same in the presence of substantially-higher traffic volumes consequent with a major Commercial and Mixed Use hub so close to the schools.
- The proposed Commercial and Mixed Use zoning is located near Salmon Creek and the sensitive Salmon Creek Watershed. And there are existing and important wetlands on the proposed Commercial and Mixed Use properties, the preservation or the replacement of which would impose severe constraints of the proposed Commercial and Mixed Use properties. As will be made evident in the next section, environmental stewardship is something about which those of us who chose to live in this part of the County are quite passionate.
- And we are more than serious about our local environmental stewardship responsibilities. Once a river has been destroyed or damaged, what recovery is possible is a long, painful, and costly process. Please see the aforementioned and attached Letter of Comment from the Salmon Creek Watershed Stewardship Council, whose advice and guidance has informed our comments and whose concerns extend beyond the bounds of this Neighborhood Association which is blessed by the presence of this important tributary and natural wonder which runs through this area.

## **7. PHNA COMMENTS ON ALTERNATIVES 2 AND 3 WITH RESPECT TO SATISFYING PREFERENCES OF PRESENT RESIDENTS AND HOME OWNERS.**

- Polls done by PHNA of residents in our area overwhelmingly reflect the desire of residents to keep this area residential with any non-residential development going in along NE 72<sup>nd</sup> Avenue which is the natural north-south corridor for Commercial and Mixed Use development.
  - ◆ The 50th Avenue Pre-Adoption Map of January 2004, an excerpt of which is included as Attachment 12 to this Letter, shows the recommended residential zoning of this PHNA area by the County Staff at that time and which was strongly preferred by residents within the PHNA area (map attached).

We realize that commercial developers are very attracted to large parcels, which the Philbrook property has, but the location of those parcels must also be considered. Rezoning of a property can allow for land use that may not be compatible with the existing neighborhood. Lack of discretionary power by the Clark County Board of Commissioners over uses falling within a given zoning also increases the risk of inappropriate uses. Finally, the wishes of the current residents and property owners should carry significant weight in such rezoning requests. After all, who better than those living and working in the area have knowledge of what is already there and the potential impacts on their area? Residents are often capable of evaluating impacts on their own area and making recommendations for adjustments to rezoning, which we are doing with this letter of comment.

Very truly yours,

Ronald Price, President  
Pleasant Highlands Neighborhood Assoc.

Alex Maynes, Vice President  
Pleasant Highlands Neighborhood Assoc.

cc: The Honorable Marc Boldt  
The Honorable Betty Sue Morris  
The Honorable Steve Stuart  
Bill Barron, County Administrator  
Rich Carson, Director, Community Development

Attachments:

1. CC Commercial and Mixed Use Zoning (examples of incompatible uses highlighted)
2. Barberton Jobs Center Plans Within PHNA Boundaries Alt 2 & 3
3. Salmon Creek Watershed Council Letter of Comment
4. Contour Map, NE 50<sup>th</sup> Avenue and Salmon Creek
5. Aerial Photo NE 50<sup>th</sup> Avenue at Salmon Creek St.
6. Aerial Photo NE 50<sup>th</sup> Avenue at Salmon Creek St., Zoomed
7. DEIS Figure 33
8. DEIS Figure 34
9. DEIS Figure 35
10. CGMP Transportation LOS 2024 Alt 2
11. PHNA Sub-Area 4 Excerpt From CGMP Transportation LOS 2024
12. 50th Avenue Pre-Adoption Map of January 2004