

## Zoning and Policy Concerns

A cement batch plant has been proposed at 7511 NE 101ST ST, VANCOUVER, WA 98662. This location was zoned (IL) Light Industrial. It was approved for an (IR) Railroad Industrial zone change 3/23/2021. This location is approximately 400 feet from (R1-6) Single-Family Residential zoned property, and 750 feet from existing (R1-6) Single-Family Residential homes.

The proposed use of the property is Ready-mix concrete manufacturing which is an (IH) Heavy Industrial use. It was approved because the property is located adjacent to the railroad. The property had outright permitted use under the previous (IL) Light Industrial zoning to use the railroad for any (IL) Light Industrial uses. The applicant wanted to use the property for an (IH) Heavy Industrial use. They used the (IR) Railroad Industrial zone change to get this approved since Ready-mix concrete manufacturing is permitted in both the (IH) Heavy Industrial as well as (IR) Railroad Industrial.

The definition provided below shows that the intended use is to provide industrial uses that have little noise, odor, and pollution. A Ready-mix concrete manufacturing plant does not fit those qualifications which is why it falls under the (IH) Heavy Industrial zone uses.

### **40.230.085 (B)1a**

*“Light Industrial District (IL). The light industrial district is intended to provide for those less-intensive industrial uses which produce little noise, odor, and pollution. It also provides for resource-based uses and service uses that are deemed compatible with light industrial uses.”*

Allowing the development of a Ready-mix concrete manufacturing plant will have a negative impact on the surrounding (R1-6) Single-Family Residential areas nearby. These facilities produce noise and pollution that is not compatible with the nearby residential homes. The pollution generated by a concrete manufacturing plant will have negative impacts on the health of those living and working in the surrounding area.

The (IR) Railroad Industrial zone is identical to the (IH) Heavy Industrial zone except for 19 uses. All of those uses except for one are permitted in the (IL) Light Industrial zone. The (IL) Light Industrial zone and (IH) Heavy Industrial zone both have outright permitted use to utilize any nearby railroad infrastructure. The only reason (IR) Industrial Railroad appears to exist is to allow for easier approval for (IH) Heavy Industrial uses along the railroad.

The comprehensive plan clearly shows separation between (IL) Light Industrial and (IH) Heavy Industrial uses. The (IR) Railroad Industrial zone undermines this separation and create a zoning loophole. This is dangerous to any residential property along the railroad that would be negatively affected by (IH) Heavy Industrial uses performed nearby. The county should really reconsider the use of the (IR) Railroad Industrial zone. It does not provide any uses beyond the current zoning and leaves too much room for abuse.

# Health Concerns

## EPA Information on Cement Manufacturing

<https://www.epa.gov/enforcement/cement-manufacturing-enforcement-initiative>

*“The cement sector is the third largest industrial source of pollution, emitting more than 500,000 tons per year of sulfur dioxide, nitrogen oxide, and carbon monoxide. Beginning in 2008, EPA has pursued a coordinated, integrated compliance and enforcement strategy to address Clean Air Act New Source Review compliance issues at the nation's cement manufacturing facilities.”*

Cement plants are a significant source of sulfur dioxide, nitrogen oxide and carbon monoxide, which are associated with the following health and environmental impacts:

- Nitrogen oxide (NO<sub>x</sub>) can cause or contribute to a variety of health problems and adverse environmental impacts, such as ground-level ozone, acid rain, global warming, water quality deterioration, and visual impairment. Affected populations include children, people with lung diseases such as asthma, and exposure to these conditions can cause damage to lung tissue for people who work or exercise outside.
- Sulfur dioxide (SO<sub>2</sub>) in high concentrations can affect breathing and may aggravate existing respiratory and cardiovascular disease. Sensitive populations include asthmatics, individuals with bronchitis or emphysema, children, and the elderly. SO<sub>2</sub> is also a primary contributor to acid deposition, or acid rain.
- Carbon monoxide (CO) can cause harmful health effects by reducing oxygen delivery to the body's organs and tissues, as well as adverse effects on the cardiovascular and central nervous systems. CO also contributes to the formation of smog (ground-level ozone), which can cause respiratory problems.

## Article Discussing Risks of Cement Manufacturing Plants

<https://kinder.rice.edu/urbanedge/its-hard-breathe-concrete-plant-your-backyard>

*“Behind the fences, mountains of sand and rock and aggregate are loaded around the clock into the drums of the trucks. That, says Corey Williams, research, and policy director for Air Alliance Houston, is the largest source of the dusty, gritty pollution that Walle has heard so much about.”*

*“That dust, a kind of air pollution called particulate matter that can penetrate deep into the lungs, is just one part of the problem that concrete batch plants present.”*

*“24-hour permits, heavy diesel trucks line up as early as 2 a.m. to idle noisily on local streets, waiting to pick up as many as 150 loads every day, emitting even more pollutants like black carbon and nitrogen dioxide.”*

*“Particulate matter is linked to serious health conditions, including reduced lung development in children, higher rates of asthma, bronchitis, heart disease and cancer.”*

*“Volatile organic compounds (VOCs) are also a problem at concrete batch plants, says Dr. Latrice Babin, director of Harris County Pollution Control. VOCs can irritate the eyes and respiratory system and cause shortness of breath, headaches, fatigue, skin problems and impair the memory. Higher concentrations of VOCs can damage the liver, kidney and brain, according to Babin.”*

*“Dr. Bakeyah Nelson, Air Alliance Houston’s executive director, has said that permits should also consider the context of the site and the cumulative impacts of exposure to many sources of pollution. The permit, she said, shouldn’t be based only on what is supposed to happen inside the fence.”*