City-County Planning Directors Coordination Meeting

Outcomes:
- Accurate representation of City Issues/Requests.
- Coordination on all BOCC work sessions on the Comp Plan update.
- Which cities are participating in the second open houses?

<table>
<thead>
<tr>
<th>Agenda Item</th>
<th>Introduced by</th>
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<tbody>
<tr>
<td>Welcome &amp; Introductions (5 minutes)</td>
<td>Oliver Orjiako</td>
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<tr>
<td>Review of last meeting summary notes (5 minutes)</td>
<td>All</td>
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<tr>
<td>Discussion of Alternative 2 (County-Initiated Changes 30 minutes)</td>
<td>Gordy</td>
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<tr>
<td>Discussion of DEAB memo to BOCC on &quot;Infrastructure Percent Deduction&quot; and BIA &quot;Population growth rate&quot; (20 minutes)</td>
<td>All</td>
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<tr>
<td>Follow-up on growth allocation/timing (10 minutes)</td>
<td>All</td>
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<tr>
<td>Roundtable (10 minutes)</td>
<td>All</td>
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<tr>
<td>Next Meeting Agenda and Location (5 minutes)</td>
<td>All</td>
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</table>

Please, plan for a group lunch in Woodland – See options!

Next meeting: November 14 - Battle Ground (10:00 – 12:00 p.m.)

Please, plan on a group lunch in Battle Ground after the meeting!

December 12, 2014 in Camas (Does the group want to postpone December meeting?)
Meeting Notes

Friday, October 10, 2014 10:00 a.m. - 11:30 a.m.

City Staff. Erin Erdman, City of Battle Ground; Amanda Smeller, City of Woodland; Bryan Snodgrass, City of Vancouver; Sarah Fox, City of Camas; Eric Eisemann, Cities of La Center and City of Ridgefield

County Staff Oliver Orjiako, Gary Albrecht
Meeting Notes by Gary Albrecht

Welcome & Introductions

• Oliver welcomed everyone to the meeting.

Review of last meeting Summary

• Last meeting summary discussed. No comments/questions. City of La Center submitted revised planning numbers.

Discussion of Alternative 1

• Current map “as-is”

Discussion of Alternative 2

• Second round of Open Houses showing the Three Alternative Maps. October 29th at Gaiser Middle School. October 30th at Ridgefield, Clark County Fire & Rescue.

• Staff reviewed Alternative 2 map. These changes are considered map clean ups. For example, combine Urban Reserve (UR) comp plan designation and overlays into one urban reserve overlay. Implemented by UR-10 overlay on residential and UR-20 on all other zones. And AG-20 proposal to AG-10, etc.

• These alternatives are available on-line.

• Proposing to include a new Public Facility zone in Title 40. City of Camas has a Park Zone and City of Ridgefield has a Public Facility Zone.

Discussion of Alternative 3

• UGA expansions in Battle Ground and La Center.

Discussion of DEAB memo to BOCC on “Infrastructure Percent Deduction” and BIA “Population growth rate.”

• Memo is not based on actual development. It focuses primarily on the Battle Ground area. Majority of future growth is unlikely to occur in Battle Ground.

• Oliver mentioned to DEAB that they are welcome to work with city/county staff as a technical group in finding a reasonable infrastructure range.

• Little development has occurred under the new storm water regulations, so it is difficult to propose a new infrastructure range.
- Cities are welcome to comment on the DEAB and BIA memos to the board. Cities believe it is better to wait for the development data to occur before adjusting the infrastructure deductions.

**Follow-up on growth allocation/timing**

- Board is aware that a tentative agreement exists with the cities and county on growth allocation.

**Roundtable**

- Clark County - Orjiako discussed the BOCC work session for the Industrial Land Bank application and presented the same information to the Planning Commission meeting. The PC asked why we couldn’t include this application with the comp plan update. The board wanted to know if they could increase the amount of acres, current application is 600 acres. Do we treat this application as one or two sites? Statute indicates two sites. If we treat this as two sites, then that is it for the county. BERK and Associates are the consultants helping with the application. They are helping with the de-designation process. MacKay and Sposito are assisting BERK and Associates with the Master Planning Process. Clark County will consult with the City of Battle Ground and the City of Vancouver. Staff will present information to the Neighborhood Association Council of Clark County.

- Clark County will go back to the Planning Commission in November to continue discussing the Surface Mining Overlay monitoring and enforcement provisions. Staff’s goal is to finish this project in 2014.

- Clark County BOCC adopted an Emergency Ordinance and is going to a hearing in November for Medical Marijuana.

- Battle Ground – Erdman mentioned that they have a proposed ordinance banning collective gardens in residential zones and allowing them in industrial/commercial zones. Working on budget and fee information. A lot of multi-family development that is happening.

- Vancouver – Four Annual Reviews this year. One on the city/county line near 182nd and third; just north of Costco.

- Washougal – Employment center designation to Planning Commission. Annexing property on northwest corner of UGB. Adopted code to prohibit marijuana retailing and processing for two years.

- La Center – Eisemann shared that the Planning Commission is working on the public participation element sending out questionnaires in sewer bills; about a 10–11% response rate. Looking at up zoning residential land in the down town area to multi-family zones. Marijuana open house held on October 7th that was well attended. City council is doing another survey on in the sewer bill on medical and retail marijuana. Public Works and WSDOT are meeting regularly discussing improvements at I-5 and La Center junction.

- Ridgefield – Eisemann said they help their first open house on the comp plan update. Workshop with Council and a hearing is scheduled on marijuana October 23rd. Pre-app for 560,000 square foot expansion for United Food Inc. The city is looking to hire staff at the beginning of the year.

- Camas – Fox indicated that they are working on bringing their 2014 comp plan updates to the Planning Commission. They had one application for 200 acres of light industrial/business park land. Staff was not going to support this change. Now the applicant is working with staff to rezone to commercial/mixed use. Next steering committee for the 2035 comp plan update is on October 16th. Visioning summit is on November 5th. Camas Youth Advisory Council will
be included in the vision plan, plan extended until the end of October. 2nd visioning summit is scheduled for January 2015.

- Woodland – Smeller mentioned that they have had a couple of Shoreline workshops with Planning Commission before shipping it out to the public. Timeline to finish is about eight months. Working on marijuana regulations – Planning Commission hearing scheduled for October 16th and a city council hearing is scheduled in November. New high school is scheduled for completion in 2015.

- Vancouver – Snodgrass discussed a Waterfront meeting that occurred on City Hall’s roof. They hired a new Transportation Planner, Patrick Sweeney. He is working on the west side freight mobility study. They have a couple of Brownfield grants. School capacity issues discussed for projected rezones.

Action Items

- Snodgrass to draft letter to come from the cities to the BOCC to keep comp plan on course
- No December city-county meeting.

Next Meeting  November 14, 2014 City of Battle Ground (10 00–12:00)
<table>
<thead>
<tr>
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<tr>
<td>Amanda Smeller, Woodland</td>
<td>Amanda Smeller</td>
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<td>Bryan Snodgrass, Vancouver</td>
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<td>Chad Eiken, Vancouver</td>
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<td>Elizabeth Decker, Ridgefield/La Center</td>
<td>Eric Eismann</td>
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<td>Erin Erdman, Battle Ground</td>
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<td>Mitch Kneipp, Washougal</td>
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<td>Phil Bourquin, Camas</td>
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<td>Robert Maul, Camas</td>
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<td>Sandra Towne, Vancouver</td>
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<td>Sarah Fox, Camas</td>
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<td>James Weldon, Yacolt</td>
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<td>Oliver Orjiako, Clark County</td>
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<td>Jose Alvarez, Clark County</td>
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<td>Colete Anderson, Clark County</td>
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<td>Matt Hermen, Clark County</td>
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<td>Laurie Lebowsky, Clark County</td>
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<td>Jacqui Kamp, Clark County</td>
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<td>Jeff Niten, Clark County</td>
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Page _____ of _____
What’s happening?

Clark County is revising its Comprehensive Growth Management Plan, a 20-year blueprint that guides development in the county. State law requires the county to periodically review its comprehensive plan and revise, if needed. The reason for the review is to accommodate population and employment growth projected between 2015 and 2035.

The Board of County Commissioners makes decisions on the comprehensive plan. If changes are adopted, they would go into effect in July 2016.

What does this mean for me?

Many property owners may be affected by changes proposed in the 2016 update. Some of the proposed changes include:

- **Rural County**: Minimum acre changes for AG-20, FR-40 and some R-20.
- **Urban Reserve**: Removal of overlay in North Salmon Creek area to reflect current development trends.
- **Public Facility**: Creation of a Public Facility zone to identify publicly owned facilities.
- **Mixed Use**: Matching comp plan designation to zoning.
- **Urban Holding**: Removal of overlay to reflect current development trends.
- **Battle Ground UGA**: Land use changes from industrial to residential to reflect current development.
- **Ridgefield UGA**: UGA expansion to enhance the city’s recreational opportunities.
- **Vancouver UGA**: Land use changes to support job growth in Salmon Creek/Discovery area.
- **Washougal UGA**: Correcting zoning map inconsistency between county and city zoning.
How can I learn more and comment?
Provide testimony online or by email, letter or comment form. Comments must be received by 5:00 p.m. on Tuesday, November 18, 2014 so the analysis work can begin on the Alternatives.

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<td></td>
<td>Put “Comprehensive Plan Alternative Testimony” in the subject line. Include your name and mailing address.</td>
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<td>Letter</td>
<td><strong>Mail your comments to:</strong></td>
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<td></td>
<td>Vancouver, WA 98666-9810</td>
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<td>3000 NE 99th Street, Vancouver</td>
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<td><strong>Presentation at 5:45 p.m.</strong></td>
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</table>
July 22, 2014

Oliver Ojijako  
Clark County Planning Director  
PO Box 5000  
Vancouver WA  98666-5000  

Re:  2016 Comprehensive Growth Management Plan Update - Population

Dear Oliver,

I write again to follow up on the population issue, and to place the new Washington OFM population data into the context of longer range data regarding the steady growth of Clark County's population. We continue to believe that the assumed growth rate of 1.12% is based on the erroneous premise that the lower growth rates of the Great Recession will continue through the planning period. As noted by the Brookings Institution, the recession years were an anomaly, and now popular metropolitan areas are returning to faster growth rates, especially our own. Their complete report is attached.

The growth rate is important because it drives the need for housing and employment lands. In addition, the per capita types and quantities of needed land depend on the age of the growing population. Sunbelt areas popular among retirees need land for housing, but require less land for schools and parks and employment uses. In contrast, areas with an influx of young adults need surplus land for housing as young people transition from apartments to houses. Young adults also drive the need for parks, employment and educational lands, as their children enter school and the parents settle into their careers.

The Brookings Institution data shows that our metro area is third highest in the entire country for inmigration of young adults aged 25-34. This data is consistent with OFM's 2013 Population Trends data which shows the percentage of senior citizens in Clark County is below the state average. (Attached, see Table 10). As a result, our metro area needs more land that one might surmise from the population growth alone. Clark County should account for the youthful aspect of in migration and the additional demand for land it requires.

The new population data published by the OFM on June 30 also demonstrates the need for additional land. More specifically, it shows the Clark County 2013 population growth was 1.68%. The result of this accelerated growth is that prior estimates have proven too low. For example, OFM's 2012 GMA Intermediate Series projection was for 447,201 residents in 2015. In 2014, the population was already up to 442,800, with 7300 being added the last year. If another 7300 newcomers arrive this year (with the population year running from April through March), the 2015 population will be 450,100, which is
July 22, 2014
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2899 people more than projected. That already requires 1089 more dwelling units than projected under OFM’s forecast.¹

These projections have been off the mark because OFM uses a remarkably short horizon when preparing its forecasts. As described in the 2012 Projections – County Growth Management Population Projections by Age and Sex: 2010-2040 report, “Caution is recommended when users see variation between current population estimates and long term projections.” The problem is that OFM’s projections are adjusted up and down every five years based on the most recent five years of data. Thus the 2007 projections have proven too high as they were based on the boom years 2002-2007. And the 2012 projections the county relies on now are too low as they are based on the Great Recession.

The 2012 report, which is based on a November, 2011 forecast, notes the reduced migration of the recession, and remarkably states: “[n]o attempt is made to predict the timing and magnitude of any significant migration rebound.” In other words, the data the county relies on presumes there will not be an economic recovery after 2011. But now the data is in, through 2013, which shows the in migration is rebounding, and the annual overall growth rate is up to 1.67%. Obviously the 2012 report erred when it assumed there would not be a rebound.

The essential point is that basing a 30 year projection on a 5 year trend has proven to be inaccurate. We urge the county to look at longer term population growth patterns as it considers land needs for the GMA update.

We examined 50 years of OFM population data for Clark County, from 1960 through 2010. Averaged over 50 years, the annual growth rate is 1.28%, which is 14% higher that the county assumes for the coming years. At the very least, the county should use this 50 year average because it smooths out economic and generational variations, and eliminates the need to predict the timing and magnitude of recessions, or baby booms, or average years.

Additional Data Support

As you are well aware, Clark County is unique as a border county sharing a metropolitan statistical area (MSA) with Portland and its surrounding urban areas. Metro is also updating its comprehensive plan and in their data suggest that the Portland/Vancouver MSA will grow between 400,000 and 750,000 by 2035 with 600,000 being the likely scenario. This is similar to the growth experienced in the MSA between 1990 and 2010 of 702,000 people from 1.5 million to 2.2 million residents. Metro is currently working to estimate where the growth will be distributed throughout the region, but if history is any indication again, Clark County will likely see a greater share of the allocation than many of the other urban areas in the region.

¹ The County adopted a 2.66 persons per household assumption based on 2010 US Census Data.
July 22, 2014
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Request

We believe that the Board should reconsider the population estimates in light of the new data streaming from OFM and Metro. At the very least a work session on the matter to understand the private sector’s view on the matter and the new data, especially in light of the unprecedented downturn in migration due to the great recession.

Very truly yours,

JORDAN RAMIS PC

Enclosures

cc: BIA
    CREDC
    Steve Horenstein
July 29, 2014

Clark County Board of Commissioners
Attn: Jennifer Clark
P.O. Box 5000
Vancouver, WA 98666-5000

Re: Comprehensive Plan Update - Infrastructure Percent Deduction

To the Board of County Commissioners,

The Development and Engineering Advisory Board (DEAB) has reviewed documents and proposals regarding the current Comprehensive Plan Update. Members of the board have expressed concern regarding the assumed infrastructure deduction percentage being used to develop the plan. The commissioners asked DEAB to provide some info and input regarding the infrastructure deduction percentage. This letter is in response to that request.

Currently the assumed infrastructure deduction percentage rate is 27.7% for residential and 25% for Commercial and Industrial. This rate has not changed with updated stormwater ordinances. While these assumptions may be appropriate in areas of well draining soils, we believe they underestimate the impact in areas of poorly draining soils which is where most of the undeveloped portion of the urban growth area is located. DEAB has conducted some research with the help of other local engineering consultants. We have attached some sample infrastructure percent calculations in soils with fairly low infiltration rates similar to the areas at the fringe of the urban growth boundary. First we looked at a few theoretical examples prepared by SGA Engineering or the county during the previous stormwater code update. On some, it was assumed LID was feasible, but in low rate soils this may not be the case, or utilizing LID may only compensate for the new LID flow standard.

With DOE forested standard with low infiltration the infrastructure % on these three example projects are: 39%, 51%, and 32%.

Next we obtained a few calculations on sample projects from several local consultants. These examples do not account for the new LID flow standard. It is assumed this will add cost but not likely take additional area.
Sterling Design provided a calculation for Whispering Pines subdivision. Under the old stormwater rules the infrastructure is 31% with the current adopted rules it goes to 34.5%.

Olson Engineering provided 4 examples in the Battleground area. No exhibits are attached but could be provided upon request.

The summary is below:
18 Lot subdivision - 42%
167 lot Subdivision - 25%
117 Lot Subdivision - 32%
26.3Ac Commercial - 34%

In conclusion DEAB feels the 27.7% is low and doesn't accurately reflect the percentage of land lost to infrastructure. The average infrastructure percentage in the 8 examples we looked at was about 36.2%. It should be noted that not all land brought into the urban growth boundary is in poorly drained soil. But based on a weighted average 32-35% is likely a more accurate range for the assumed Infrastructure Percent Deduction.

Please let us know if you have any questions.

Respectfully,

Michael Odren, R.L.A.
Chair, Development and Engineering Advisory Board

Eric E. Golemo, PE
Sub-Committee Chair, Development and Engineering Advisory Board

Attachments and Supporting Information:
1) Site use per code Table Projects 1-3
2) Project 1 - Figure
3) Project 2 - Figure
4) Project 3 - Figure
5) Email from Peter Tuck of Olson Engineering (7-2-2014) - Project examples
6) Email from Joel Stirling of Sterling Design (7-10-2014) - Project example
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(PREDEVELOPED FORESTED CONDITION)
POND UNDER CURRENT STORM ORDINANCE
POND UNDER PROPOSED STORM ORDINANCE
(PREDEVELOPED FORESTED CONDITION)
Jamie/Eric,

Regarding the area of a project impacted by road ROW and stormwater facilities in the Battle Ground area, I have the following:

18 Lot subdivision - 42%
167 lot Subdivision - 25%
117 Lot Subdivision - 32%
26.3Ac Commercial - 28% with no frontage since City did that project. If that area was included %age would increase to approximately 34%

These calculations take the developable area only and do not include wetland areas that are not impacted.

Let me know if you have any questions.

Peter.

-----Original Message-----
From: Jamie Howsley [mailto:jamie.howsley@jordanramis.com]
Sent: Tuesday, July 01, 2014 3:38 PM
To: Eric Golemo; Peter Tuck
Cc: Mike Odren
Subject: RE: Comp Plan update Infrastructure deduction

Holsinger is giving me something tomorrow. He thinks 40%

Please excuse spelling mistakes as is sent with Good via my IPhone (www.good.com)

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have any questions about this requirement, or would like to discuss preparation of an opinion that conforms to these IRS rules.

-----Original Message-----
From: Eric Golemo [mailto: EGolemo@SGAengineering.com]
Sent: Tuesday, July 01, 2014 03:34 PM Pacific Standard Time
To: Peter Tuck
Cc: Mike Odren; Jamie Howsley
Subject: RE: Comp Plan update Infrastructure deduction

Were you able to come up with anything? I would like to respond to the Commissioners this week. Our office is working on some info. But, we don’t have a lot going on in Battleground right now under the new code. Do you have any examples you could contribute.

From: Eric Golemo [mailto: EGolemo@SGAengineering.com]
Sent: Thursday, June 26, 2014 4:05 PM
To: Peter Tuck (peter@olsonengr.com)
Cc: Mike Odren (mikeo@olsonengr.com); James Howsley (Jamie.howsley@jordanramis.com)
Subject: Comp Plan update infrastructure deduction

Peter,

Jamie and I attended the hearing on the comp plan. One of the items we are working on is the infrastructure deduction. It is currently set at 27%. This hasn’t changed with the Stormwater code. We have argued that the 27% is likely adequate where you have good to moderately draining soils but not in poorly drained soils. The commissioners asked for some supporting documentation. Our office is working on some info. But, we don’t have a lot going on in Battleground right now under the new code. Do you have any examples you could contribute.

Thanks,

Eric

Eric E. Golemo, PE
Owner / Director of Engineering and Planning

SGA Engineering, PLLC

Civil Engineering / Land Use Planning

Development Services / Landscape Architecture
2005 Broadway, Vancouver WA 98663
Phone: (360)993-0911
Fax: (360)993-0912

Mbl: (360)903-1056
Email: EGolemo@sgaengineering.com
The stormwater management facilities would increase from 9% of the project up to 12.5% project under that scenario. Total infrastructure would go from 34% up to 37.5% if the park dedication is included or from 31% up to 34.5% without the park.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl. (360) 600-5666

-----Original Message-----
From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, July 10, 2014 1:03 PM
To: 'Joel Stirling'
Cc: James Howsley
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Do you have an updated infrastructure percentage I can plug in?
Thanks,
Eric

-----Original Message-----
From: Joel Stirling [mailto:joel@sterling-design.biz]
Sent: Thursday, July 10, 2014 12:56 PM
To: 'Eric Golemo'
Cc: 'Joel Rutherford'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Good Afternoon Eric,

Based on the model run that I put together in the WWHM2012 program, utilizing the Auto Pond feature, the pond size went from 1.07 acres up to 2.19 acres which is roughly double the size (2.05 times larger). It is my experience that the Auto Pond feature is very conservative and the pond likely can be optimized further but even with the optimization it appears that there is a significant increase in required detention storage between the old and the new stormwater requirements for the Whispering Pines Subdivision. Let me know if there is anything else I can assist you with.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl.(360) 600-5666

-----Original Message-----
From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, July 10, 2014 10:37 AM
To: 'Joel Stirling'
Cc: Joel Rutherford
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Joel,
Were you able to get an estimate under the new code?
Thanks,
Eric

-----Original Message-----
From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Wednesday, July 02, 2014 3:50 PM
To: 'Joel Stirling'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Thanks.

-----Original Message-----
From: Joel Stirling [mailto:joel@sterling-design.biz]
Sent: Wednesday, July 02, 2014 3:46 PM
To: 'Eric Golemo'; 'Jamie Howsley'; peter@olsonengr.com
Cc: mike@olsonengr.com
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

I am stuck in meetings for the rest of the afternoon today but will see if I or one of my staff can set up a model run in WWHM12 in the morning for comparison. As you all are aware, the requirement to utilize "old growth forest" as the pre-developed site condition is likely what will have the biggest impact on the size of the pond. I will keep you posted.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl.(360) 600-5666

-----Original Message-----
From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Wednesday, July 02, 2014 3:40 PM
To: 'Jamie Howsley'; peter@olsonengr.com
Cc: mike@olsonengr.com; Joel Stirling
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Do we have a calculation for the new code?
Joel, have you looked at this?

-----Original Message-----
From: Jamie Howsley [mailto:jamie.howsley@jordanramis.com]
Sent: Wednesday, July 02, 2014 2:54 PM
To: Eric Golemo; peter@olsonengr.com
Cc: mike@olsonengr.com; Jamie Howsley
Subject: Whispering Pines Infrastructure Deduction-Battle Ground

Eric and Peter,

Attached is the infrastructure deduction for Holsinger's Whispering Pines subdivision. It is approved however under the old stormwater rules. I am being told that the stormwater would likely double if under the new rules.
As you can see with the park it is 34% without 31%.

Best,

Jamie

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360-567-3913
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-----Original Message-----
From: MPC6000-VAN@jordanramis.com [mailto:MPC6000-VAN@jordanramis.com]
Sent: Wednesday, July 02, 2014 2:51 PM
To: Jamie Howsley
Subject:

This E-mail was sent from "MPC6000-VAN" (Aficio MP C6000).

Scan Date: 07.02.2014 14:50:45 (-0700)
Queries to: MPC6000-VAN@jordanramis.com
Sample draft letter from Cities to County Commissioners on comp plan update

Commissioners

With the Clark County Comprehensive Plan Update entering key stages, we write to you in support of the decisions and process you and your staff have provided, and with some recommendations to keep the process on track towards a timely and successful conclusion in June 2016.

As representatives of local cities, we fully support the Board’s stated objectives of emphasizing jobs over housing growth in this update, and of keeping cities “whole” by not forcing unrequested reductions or expansions of Urban Growth Areas. As you know the cities of Battle Ground, Ridgefield and La Center have requested small, site specific UGA expansions based on employment opportunities. The other cities are focused on growing within existing boundaries for this plan update cycle.

We offer the following as the process moves forward, some of which has been discussed but bears reinforcing:

**Baseline decisions made are sound, but minor adjustments will be needed further in the process**

We support the Board’s initial decisions of countywide growth forecasts, allocations among the UGAs, and assumptions used to calculate land needs. However, as has been acknowledged, some minor adjustment of the growth allocations and potentially the countywide forecasts may be needed to avoid forcing unwanted UGA reductions or expansions driven by the math. We recommend that these adjustments be formalized later in the process when land use decisions are clearer, rather than adopting allocation adjustments now and potentially having to do so again at the end.

**Major changes to baseline decisions may undermine the process and outcome**

We do want to provide input on two recent proposals which represent more fundamental changes to the baseline decisions made, with negative consequences in our view:

**Population Forecast**

The 2012 medium forecast adopted is what OFM formally projects as most likely to occur, and it has already been incorporated into transportation planning by RTC, as well as in this process. Consultation with OFM staff and materials confirm that the forecast is based on long term demographic and economic considerations, with some adjustment based on recent data. It is not based on the past few years only, and does not presume there will be no economic recovery, only that the precise timing isn’t known.

Replacing this with a forecast that simply extends the past 50 years growth trend does not appear sound. This assumes we will maintain growth rates originating from a time when Clark County was 1/5 its
current size, fertility rates were higher, there were wide expanses of large land tracks to accommodate new development, and major new freeways were being built that opened new access to these areas. Clark County remains a desirable place, but many of the factors that have fueled growth rates over the past half century will not be present to the same degree over the next 20 years.

**Infrastructure Assumption**

The currently adopted 27.7% assumption is based on County analyses of infrastructure dedications that occurred in actual developments. New state mandates will undoubtedly make stormwater issues more challenging, but land implications are unclear, and stormwater only constitutes a portion of infrastructure. Proposals to increase the infrastructure assumption appear mainly based on theoretical examples, and the case for an increase based on stormwater is not supported by a County Environmental Services Department staff analysis completed in April 2014 in response to this question. That analysis noted that smaller, decentralized drainage facilities will be likely needed, but new County road standards have options to accommodate some of these in the right-of-way. The County included case studies of recent developments showing that stormwater facilities accounted for only 7% of land, and only 9% on poorly drained sites. The County analysis further noted a lack of evidence from other comparable jurisdictions for increasing beyond the current 27.7% – King County assumes that all public facilities, including parks and schools as well as stormwater, accounts for only 12% of land. Snohomish County’s stormwater-only estimate is 5%. The County staff findings are consistent with what we are hearing from our public works colleagues.

City concerns about these proposals are also driven by the policy and process implications. For example, increasing the population forecast to one based on 1.28% annual growth as proposed would add another 16,000 or more persons to the total population forecast, which in turn would require increasing the employment forecast by 7,000 or more jobs in order to maintain the desire jobs to housing ratio. This is equivalent to adding a second City of Battle Ground to the growth already is being planned for, and would likely require UGA expansions of several square miles. Raising the infrastructure deduction to 32-35% as proposed would similarly mean increasing the total residential land supply needed countywide by approximately 25%, which by itself appears likely to trigger the need for significant UGA expansions for housing even without changes to the population forecast.

Unlike the site specific UGA expansion proposals from some of the cities, there are not known plans or proposals for accommodating growth of this magnitude or funding needed services. Large UGA expansions may outstrip realistic capital facilities capabilities, and at minimum trigger further use of Urban Holding designations on the new lands. From a process standpoint, a full new Environmental Impact Assessment would be needed, resulting in a lengthier and more costly update process than the cities or County has anticipated. The final adopted plan would be subject to considerably more legal scrutiny and exposure, putting the cities site-specific UGA expansions at risk of being of being invalidated as part of the much larger expansions driven by the higher population forecast.
We respectfully recommend the Board stay the overall course it has set, with adjustments as needed but not fundamental changes. As City representatives we are comfortable that this will provide a fully sufficient amount of land for growth, in part because the many safeguards in place to ensure that supplies do not become constrained. The Growth Management Act requires that 20-year land supplies be updated every 8 years, effectively meaning supplies are replenished before they are even half consumed. The GMA further allows for restocking more frequently than that if needed, an option this County has previously exercised. Local land supplies also use a 25% market factor, meaning they are set ¾ larger than their calculated need. In calculating land supplies, Clark County excludes 10% of vacant and 30% of underutilized residential land acreages under the assumption it won’t develop for market reasons.

We look forward to continued discussion and again express our appreciation for the inclusive and efficient process to date.

Sincerely