

**Lebowsky, Laurie**



**From:** Robert Sepler <rsepler@mrsc.org>  
**Sent:** Tuesday, October 27, 2015 4:14 PM  
**To:** Lebowsky, Laurie  
**Cc:** Golik, Tony  
**Subject:** Parks and Recreation Element of a Comprehensive Plan

Ms. Lebowsky,

As an initial matter, I am cc'ing your county prosecutor on this response because MRSC is required to do so by RCW 43.110.030(3) through MRSC's contract with the Washington State Department of Commerce with regard to requests for legal services.

I think that RCW 36.70A.070(8) does require that the county's comprehensive plan include a parks and recreation element. In practice, the required parks and recreation element is generally given its own chapter in the comprehensive plan.

I also recommend that you discuss this issue with your county prosecutor's office. Please feel free also to email me or call me at one of the numbers below if you would like to discuss this issue further.

Best Regards,

**Robert Sepler**  
Legal Consultant  
206.625.1300/800.933.6772 | [MRSC.org](http://MRSC.org) | Local Government Success

Name: Laurie Lebowsky  
Title: Planner III  
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Is a parks chapter a required element of a comprehensive plan?  
Per RCW 36.70a.070(8), I believe it is a required element; however, we have had a local citizen question whether or not the parks chapter is required.  
Thank you

## Lebowsky, Laurie

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**From:** Mielke, Tom  
**Sent:** Friday, October 09, 2015 1:41 PM  
**To:** Lebowsky, Laurie  
**Subject:** FW: Per Dept. of Commerce; Parks element technically not required

Hi Laurie,

I wanted to share this with you as if we didn't already have enough to confuse us. I haven't read the RCW's yet but they are provided here. I'll have to take another look.

Tom

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**From:** susan rasmussen [<mailto:sprazz@outlook.com>]  
**Sent:** Friday, October 09, 2015 12:51 PM  
**To:** Mielke, Tom; Stewart, Jeanne; Madore, David  
**Cc:** Carol Levanen  
**Subject:** Fw: Per Dept. of Commerce; Parks element technically not required

Per Dept. of Commerce; "Technically NOT required to have a parks element in the comprehensive plan per RCW 36.70A.070 (9)

Sent from Windows Mail

**From:** [Joyce.Phillips@commerce.wa.gov](mailto:Joyce.Phillips@commerce.wa.gov)  
**Sent:** Friday, October 9, 2015 11:09 AM  
**To:** [susan\\_rasmussen](mailto:susan_rasmussen)

Hi, Susan.

Technically, a city or county is NOT required to have a parks element in their comprehensive plan under the Growth Management Act. This is because of language in state statute (See RCW 36.70A.070(9)), which states:

9) It is the intent that new or amended elements required after January 1, 2002, be adopted concurrent with the scheduled update provided in RCW 36.70A.130. Requirements to incorporate any such new or amended elements shall be null and void until funds sufficient to cover applicable local government costs are appropriated and distributed by the state at least two years before local government must update comprehensive plans as required in RCW 36.70A.130.

However, if a city or county were to include a parks and recreation element in their comprehensive plan, we would suggest that it be consistent with the provisions in RCW 36.70A.070(8).

8) A park and recreation element that implements, and is consistent with, the capital facilities plan element as it relates to park and recreation facilities. The element shall include: (a) Estimates of park and recreation demand for at least a ten-year period; (b) an evaluation of facilities and service needs; and (c) an evaluation of intergovernmental coordination opportunities to provide regional approaches for meeting park and recreational demand.

Many communities have done that. And they are working to meet the RCO (recreation and conservation office) planning requirements in order to be eligible for RCO grants. Commerce Growth Management Services webpage contains more information on parks and recreation planning:

<http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Growth-Management-Planning-Topics/Pages/Parks-Open-Space-and-Recreation.aspx>

I hope that is helpful. Please let me know if you have additional questions.

Joyce

**Joyce Phillips, AICP**

*Senior Planner, Growth Management Services*

Local Government Division

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*My hours are M-Th 8:00 – 5:30, F 10:00 – 2:00*

**Washington State Department of Commerce**

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[www.commerce.wa.gov/growth](http://www.commerce.wa.gov/growth)

 Please consider the environment before printing this email and any attachment. Thank you.

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**From:** susan rasmussen [<mailto:sprazz@outlook.com>]

**Sent:** Wednesday, October 07, 2015 2:02 PM

**To:** Phillips, Joyce (COM)

**Subject:**

Hello,

I have a question. Is a county required to write a parks element in their comprehensive plan update? If yes, how extensive does it have to be? Do you have a good example to pass along?

Thank you,  
Susan Rasmussen

Sent from Windows Mail