



City of Battle Ground

Community Development Department
109 SW 1st Street, Suite 127, Battle Ground, WA 98604
360.342.5047



November 24, 2015

Board of County Councilors
1300 Franklin Street, 6th Floor
Vancouver, WA 98666

RE: Proposed Changes to Planning Assumptions for the 2016 Comprehensive Plan Update

Dear Councilors,

The City of Battle Ground would like to take this opportunity to express some concerns regarding the proposed changes to the planning assumptions that have been discussed at the October 20, 2016 board hearing and at the November 9, 2016 work session.

The City feels that this new proposal will jeopardize the process and methodology that the County has established for this comprehensive plan update. We feel these proposed assumptions could threaten the county's ability to adopt a legally defensible Comprehensive Plan within the deadline of June 30, 2016. This in turn could potentially threaten the city's Comprehensive Plan update if it is not in line with the county plan.

The City is concerned with the validity of the proposed planning assumptions. The methodology in which these assumptions are based on has not been clearly provided, nor has it been vetted by county planning staff. Some areas of major concern are;

1. If the board changes the adopted planning assumptions does this still meet the Growth Management Act (GMA) update requirements and public process? The board adopted a public participation plan that does not include altering already adopted planning assumptions.
2. Do these proposed changes still fall within the supplemental environmental impact statement? We have yet to hear for the County attorneys regarding this matter.
3. What methodology was used to generate the new proposed alternative/assumptions? The city is not clear on how these proposed numbers were generated, and has not been provided the logic of how they were reached. From our understanding county staff is unsure of how these assumptions came to fruition as well.
4. It appears that the population assumption is being increased and distributed only within rural areas. The focus of GMA is to plan growth in urban areas and not promote sprawl, this appears to counter GMA goals.

The county and all the cities spent a lot of time and effort analyzing the planning assumptions that were adopted in April of 2015. The City of Battle Ground has used the planning

assumption, adopted by the board of councilors, to move forward with our comprehensive plan update and have completed updates of our capital facilities plans based on these assumptions.

We feel that in order to stay on track for a June 30, 2015 adoption, and be in compliance with GMA regulations that these changes should not be made at this time. The city has spent a lot of time and expense moving forward with our planning efforts based on the assumptions adopted by the board back in April 2015.

Thank you for the opportunity to comment on this issue. We look forward to working with you throughout this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Erdman".

Erin Erdman, Community Development Director
City of Battle Ground

c: file