

From: [Jacqui Kamp](#)
To: [Sonja Wiser](#)
Subject: FW: Joint letter regarding Comprehensive Plan process
Date: Thursday, April 6, 2023 1:45:28 PM
Attachments: [image001.png](#)
[23 04 04 joint cities ltr on county process master.pdf](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

From: Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Sent: Wednesday, April 5, 2023 1:05 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jacqui Kamp <Jacqui.Kamp@clark.wa.gov>; Christine Cook <Christine.Cook@clark.wa.gov>; Leslie Lopez <Leslie.Lopez@clark.wa.gov>
Subject: FW: Joint letter regarding Comprehensive Plan process

I will also forward to the Council.



Kathleen Otto
County Manager

564.397.2458



From: Delapena, Amanda <Amanda.Delapena@cityofvancouver.us>
Sent: Wednesday, April 5, 2023 12:42 PM
To: Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Cc: Holmes, Eric <Eric.Holmes@cityofvancouver.us>; Erin Erdman <erin.erdman@cityofbg.org>; Doug Quinn <dquinn@cityofcamas.us>; bkast@ci.lacenter.wa.us; Steve Stuart <Steve.Stuart@ridgefieldwa.us>; David Scott <David.Scott@cityofwashougal.us>
Subject: Joint letter regarding Comprehensive Plan process

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Good afternoon Kathleen,

Attached please find a letter sent on behalf of Clark County city managers and administrators regarding the role of cities in the County's Comprehensive Plan Update process.

Regards,

Amanda Delapena | Assistant to the Mayor and City Manager
Pronouns: She/Her/Hers



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April 4, 2023

TO: Clark County Manager Kathleen Otto

RE: Role of Cities in the County Comprehensive Plan Update process

Ms. Otto:

On behalf of the cities of Clark County, we look forward to coordinating with the Clark County Council, administration, and staff as we all move forward with our respective Comprehensive Plan updates. The County's January 19 public kick off meeting set the regional process off to a good start.

As noted in that meeting there are several important decisions about growth forecasts, environmental review and ultimately UGA boundaries and designations that will be made, beginning this spring and continuing through until final adoptions in spring 2025. Although the County has final authority for these decisions, state and local policy establishes local Cities as not just impacted parties or stakeholders, but as partners in this process.* To reflect that, and to facilitate a better understanding of the complex interjurisdictional issues involved, we are writing with some modest but important procedural requests. These requests would not require any changes to the draft County Public Participation Plan recently approved for this update, and most reflect a continuation of practices established during the County's 2016 Plan update.

One new request relates to public hearing testimony. In our view limiting Cities to advance written comments and just three minutes testimony, the same as any member of the public or stakeholder, is not consistent with the partnership role directed by state law, or with the local policies in city and county plans. It also often doesn't allow sufficient time to review the complex interjurisdictional implications of many of these decisions. We would respectfully request that for decisions with significant implications for their respective cities or UGAs, each city be allowed up to 15 minutes testimony and access to visual aids if needed. The County Council will of course also need to hear from the public and other parties, and so we commit to not using any more of our hearing time than absolutely needed. While this doesn't rise to the

level of joint hearings envisioned in longstanding local Countywide Planning Policy 1.1.12, it does give Cities a role consistent with the other state and local policy direction.

A 2016 practice we would request retaining is to allow City representatives to participate directly in County workshops alongside County staff where appropriate, to allow direct technical and policy exchange on interjurisdictional issues. From our staffs' standpoint this practice worked smoothly for all parties in the 2016 update and did not detract from the County's ability to control the workshops or make final regional decisions in a timely manner. Interjurisdictional coordination will be particularly complex in this update cycle because of recent and emerging state housing requirements.

Another past practice worth continuing is having one of the various land use alternatives analyzed in the Draft Environmental Impact Statement (DEIS) be devoted to the cities' collective UGA proposals. These were included in Alternative 3 in the 2016 DEIS. This does not alter the County's lead agency status in the EIS process, its ability to include other alternatives of its choosing, or its authority to evaluate all the alternatives, including the cities proposal, under the impacts the County has identified.

Thank you very much for your consideration. Please let us know your thoughts as we move into important countywide decisions in the coming weeks and months. Please also let us know if there are other practices or policies which from a County standpoint we can pursue to better facilitate coordination and cooperation, and a smooth and sound process in this Comprehensive Plan update under County leadership.

Sincerely,



Battle Ground City Manager



Camas City Administrator



Community Development/Public Works
Director, City of La Center



Ridgefield City Manager



Vancouver City Manager



Washougal City Manager

*Cities, along with the Governor, are uniquely allowed to appeal Countywide Planning Policies. Counties are required to attempt to reach agreement with cities regarding UGAs and justify their position in writing if agreement can't be reached, with the Department of Commerce attempting to resolve any formal objections where appropriate. UGA review should be conducted jointly including consultation with cities, with the result reflecting a cooperative effort. (RCW 36.70A.110). Procedurally, cities should first propose the location of UGAs. (WAC 365-196-310). Longstanding local Countywide Planning Policies adopted into all our respective Comprehensive Plans go further, calling for cities and counties to play partnership roles in the production of plans which provide the opportunity for public and mutual participation, review, and comment" including "joint hearings within the urban growth areas" (CPP 1.1.12 and 1.1.13, page 42 in County Comprehensive Plan).