

**From:** [Jeffrey Delapena](#)  
**To:** ["Sam Crummett"](#); [Oliver Orjiako](#); [Jose Alvarez](#)  
**Cc:** [Bart Catching](#)  
**Subject:** RE: Clark County Letter from Battle Ground  
**Date:** Thursday, November 7, 2024 2:01:00 PM  
**Attachments:** [Clark County Planning Commission letter from City of BG.pdf](#)

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Hello Sam,

Thank you for sending this written testimony on behalf of the City of Battle Ground.

I am entering this into the Comprehensive Plan Index of Record, and your comments will be sent to the Planning Commission before the Hearing.

Regards,  
Jeff Delapena

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**From:** Sam Crummett <sam.crummett@cityofbg.org>  
**Sent:** Thursday, November 7, 2024 1:52 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>  
**Subject:** Clark County Letter from Battle Ground

**EXTERNAL:** This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Jeff, Oliver, Jose,

Please include the attached letter into the Record for this evening's PC meeting. I will also present on this, this evening.

Thank you,  
Sam



# City of Battle Ground

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

November 7, 2024

Clark County Planning Commission  
1300 Franklin Street  
Vancouver WA, 98666

Dear Chair Johnson and Planning Commissioners members,

Thank you for the opportunity to comment on the growth alternatives for the City of Battle Ground. I would like to present two growth scenarios at this time.

**Battle Ground's growth Alternative 1** (Figure 1) is the preferred growth alternative resulting from the work completed in Battle Ground's Land Use Master Plan study, adopted by the city council in June 2021. The major feature of this growth alternative is an urban growth boundary expansion extending to the Dollars Corner area solely for employment growth. This would add approximately 450 gross acres. This area has already received state transportation infrastructure investment, and its location minimizes traffic impacts related to shipping and freight in Battle Ground's city center. This also removes approximately 330 acres of the Meadow Glade area in the southwest from the current UGA. Existing development patterns and lack of infrastructure make this area unlikely to develop within the 20-year planning horizon. Removing this residential area will help focus residential growth more compactly into the rest of Battle Ground's planning area. This removal helps balance the additions proposed to the north and west, detailed in this alternative.

**Battle Ground's growth Alternative 2** (Figure 2) captures the growth represented in Alternative 1, but also includes several site-specific requests received from private landowners. More details of the site-specific request are included in Attachment A, "Growth Alternatives Letter to Clark County Community Planning, August 20, 2024." The City of Battle Ground takes no position on the site-specific requests currently. Further analysis is needed before we can justify any additional residential or employment growth at this time as shown in Alternative 2.

We need to verify our land capacity analysis for Alternative 1 to ensure that it will allow us to meet our growth targets for housing and jobs. If this shows that we fall short of capacity, then we can consider some of the site-specific requests identified in Alternative 2. We also need to demonstrate compliance with House Bill 1220, which requires accommodating housing for all economic segments of our population, including other provisions. We will need to look at different options to achieve this and then provide opportunities for public

participation and allow our planning commission and city council to provide us with further direction.

Listed below are Battle Ground's capacity for housing and jobs for our twenty-year planning horizon.

**Battle Ground's Capacity and Growth Target Allocation**

<u>County VLBM</u>	<u>Battle Ground LUMP*</u>	<u>Growth Target Allocation</u>
<i>Housing units</i>		
9,362	8,264	6,979
<i>Jobs</i>		
7,677	8,260	9,249

\*Land Use Master Plan (LUMP) study completed in 2021. These figures are updated to account for the growth that occurred between then and 2023.

Finally, I would encourage Clark County to continue to use the planning assumptions and growth allocations already decided upon to date. I appreciate County staff's leadership and collaboration with partner cities during this process.

Thank you for the opportunity to comment.

Sincerely,

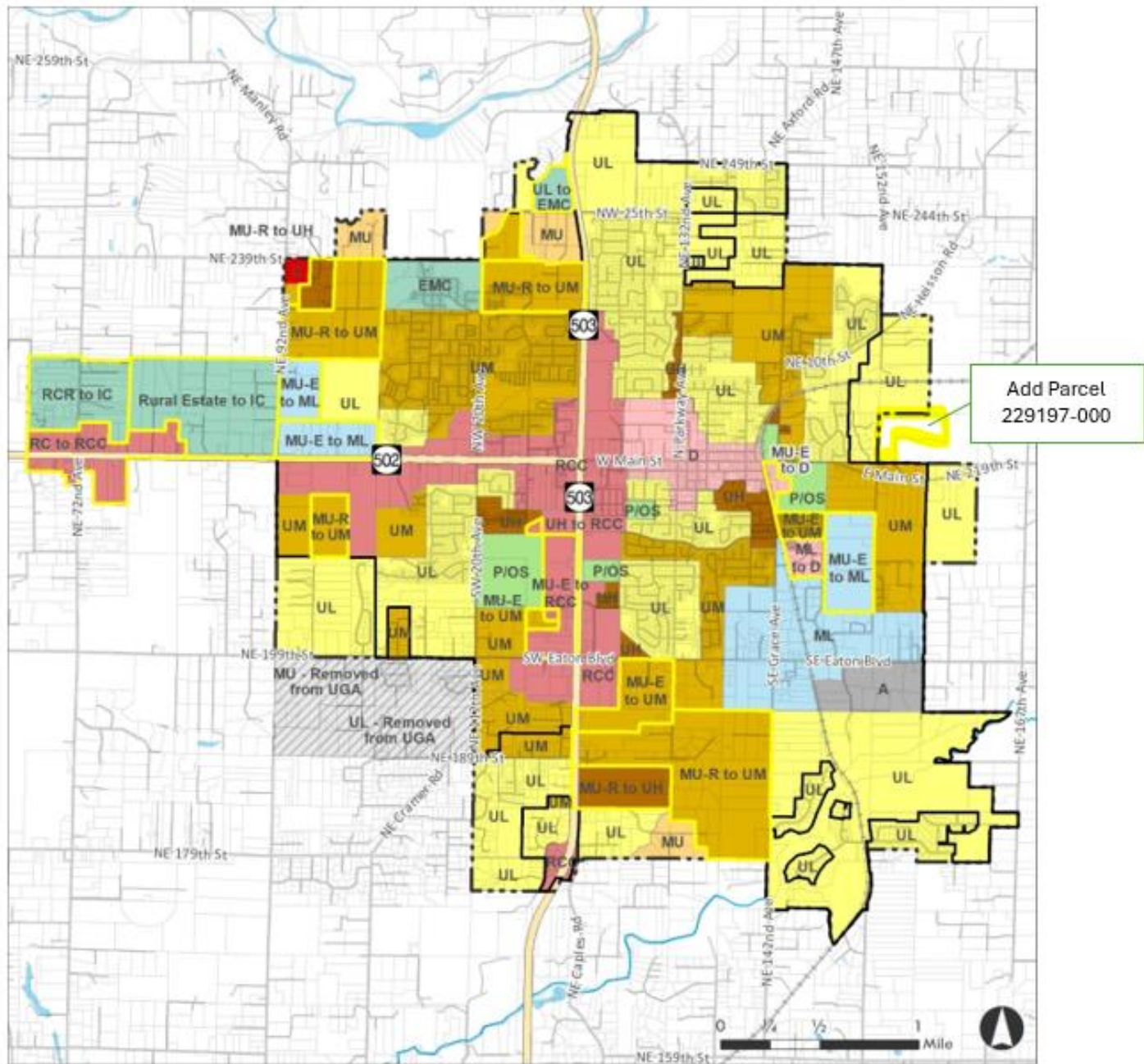


Sam Crummett  
Planning Supervisor

C: Kristin Lehto, Community Development Director  
City Manager, Kris Swanson

Attachment A - Letter to Jose Alvarez, Clark County Community Planning, August 20, 2024

Figure 1. Battle Ground Preferred Alternative



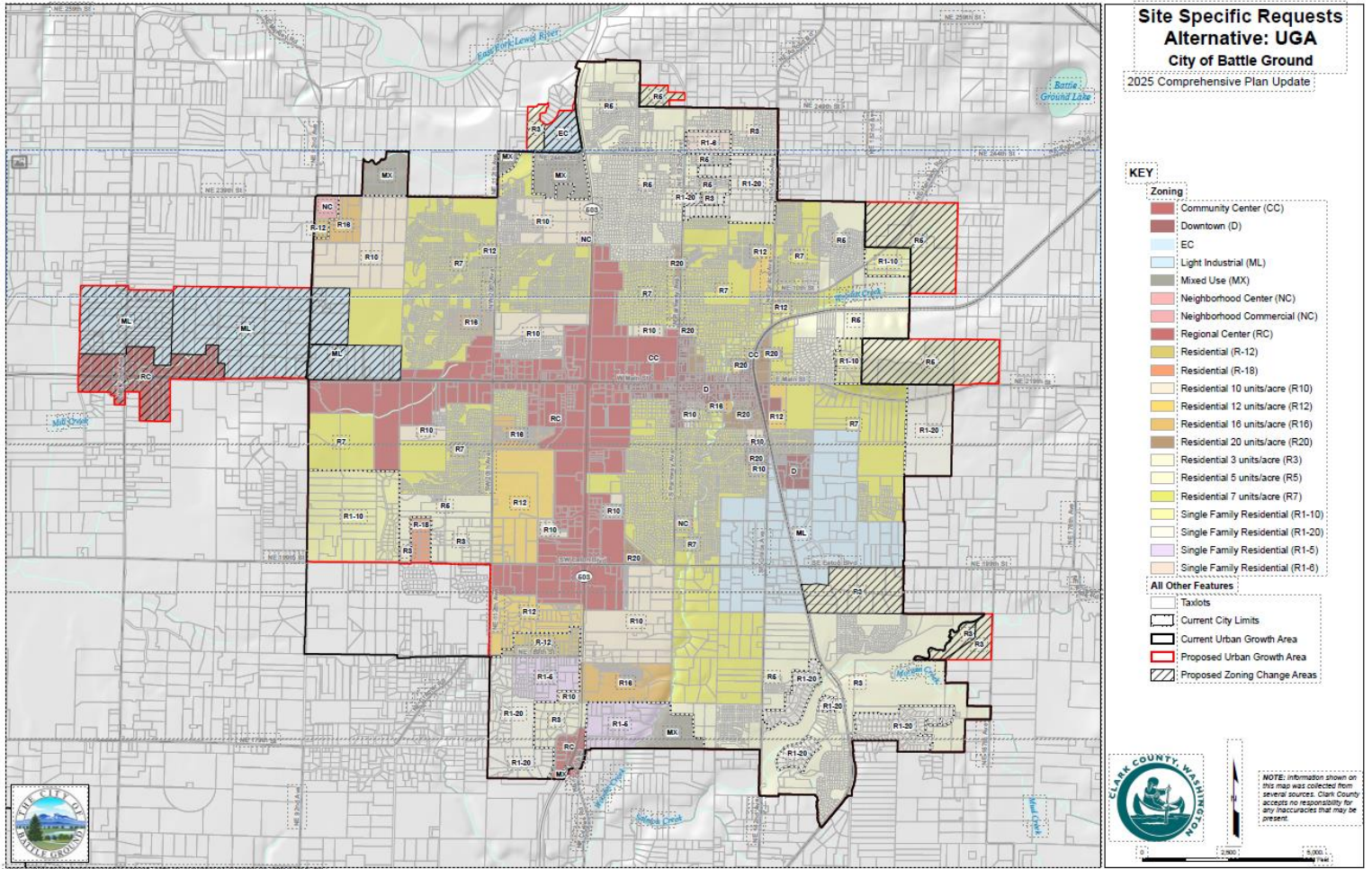
**Battle Ground Comprehensive Plan Designations - Preferred Alternative**

- Urban Low Density Residential (UL)
- Urban Medium Density Residential (UM)
- Urban High Density Residential (UH)
- Downtown (D)
- Commercial (C)
- Regional Center (RCC)
- Business Park/Employment Campus (IC/EMC)
- Light Industrial (ML)
- Mixed Use (MU)
- Parks/Open Space (P/OS)
- Airport (A)
- Designation Changes
- Battle Ground City Limits
- Urban Growth Area
- State Routes
- Roads





Figure 2. Property Owner Site-Specific Requests Alternative





# City of Battle Ground

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

August 20, 2024

Dear Jose Alvarez,  
Clark County Community Planning  
--sent via email--

In anticipation of our current periodic review cycle, the City of Battle Ground has adopted the Land Use Master Plan in June of 2021. Following community feedback, and stakeholder involvement, the City developed a Preferred Growth Alternative that blended the desired features of draft alternatives to create a path forward for Battle Ground.

The Preferred Alternative seeks to increase land available for employment with the City of Battle Ground and its UGA. It identifies land use and zoning changes within the City’s existing planning area as well as changes to the UGA boundary.

See Exhibit 2 for the Preferred Future Land Use, and Exhibit 3, for the Preferred Zoning.

The Preferred Alternative fulfills GMA requirements to provide capacity to meet residential and employment growth targets. It is also designed to focus growth and avoid sensitive areas and agricultural lands. See Exhibit 1.

- Reasonable measures add capacity within the city limits and existing planning area by modifying zoning to support employment growth.
- The removal of Meadow Glade from the UGA would help to focus residential growth in areas to avoid sprawl.

## Key Growth Management Provisions GROWTH PRINCIPLES

While Battle Ground has local authority to develop a vision and long-range plans, its planning must take place within the framework of the Growth Management Act (GMA; RCW 36.70A). Under GMA, community growth is focused in urban areas to encourage efficiency, sustainability, economic development, and the preservation of natural resource areas. Counties must ensure that there is sufficient capacity for population growth as well as the appropriate medical, governmental, educational, institutional, commercial, and industrial facilities to support this growth (RCW 36.70A.115).

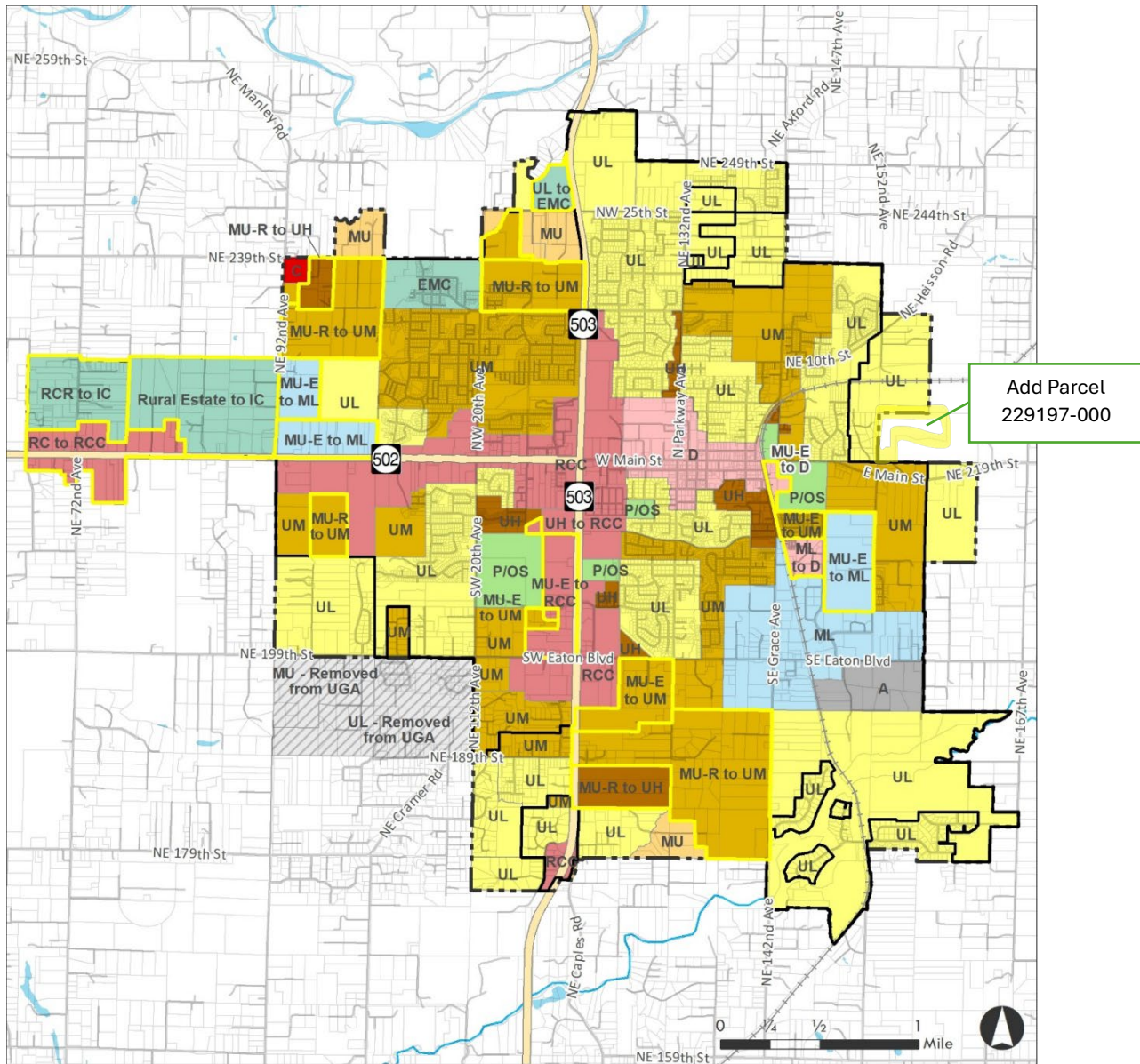
### Exhibit 1. Key Growth Management Provisions

<b>Sprawl</b>	Focus development in urban areas to avoid sprawl.
<b>Infrastructure</b>	Provide efficient services and infrastructure.
<b>Critical Areas</b>	Protect critical environmental areas.
<b>Flood Plains</b>	Avoid flood plains.
<b>Resource Lands</b>	Avoid forestry and agricultural resource lands of long-term commercial significance.



- The western employment expansion to Dollar's Corner avoids lands with major environmental constraints, and would redesignate rural lands and avoid agricultural resource lands south of SR-502.

## Exhibit 2 Preferred Alternative Future Land Uses



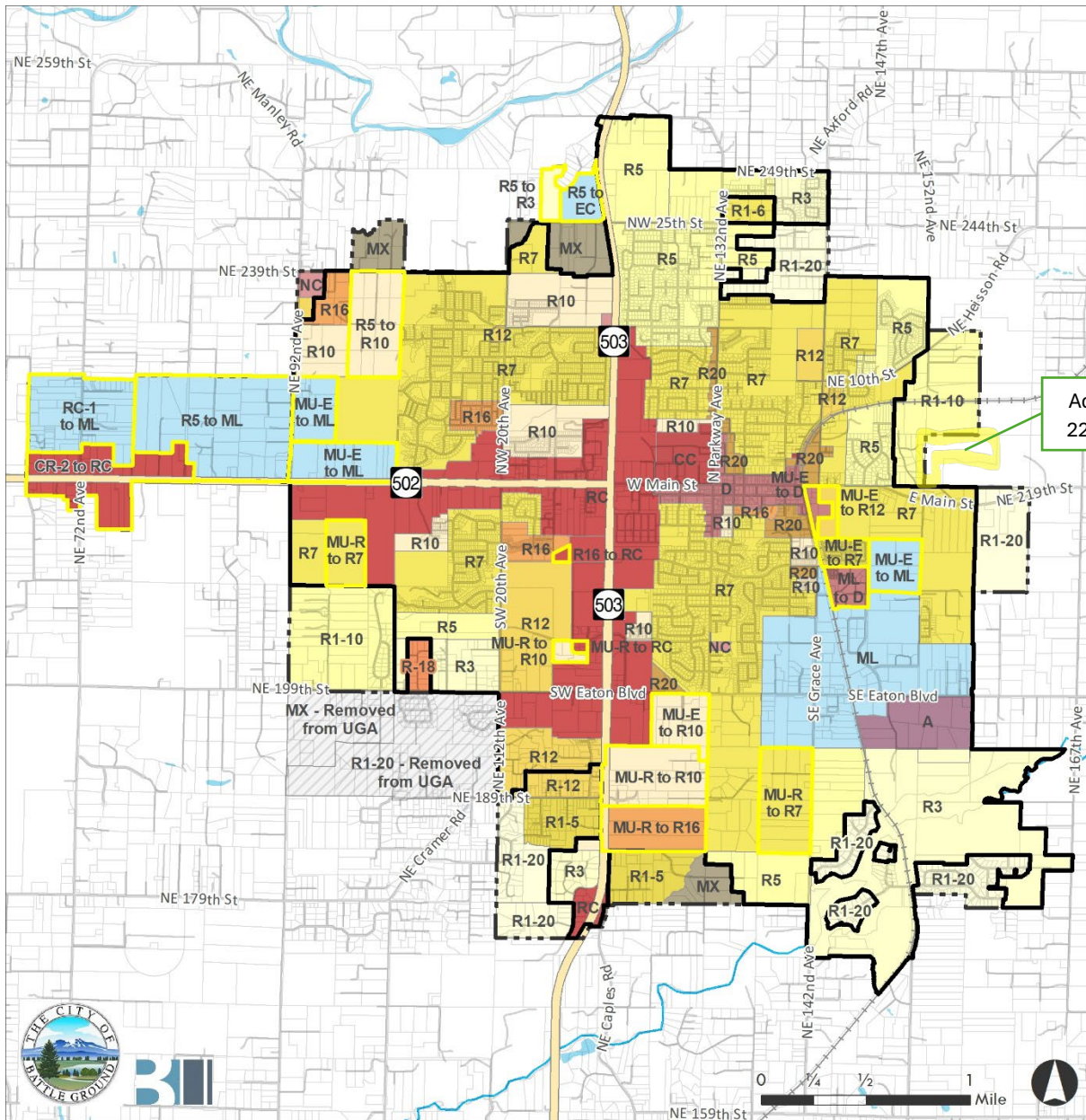
### Battle Ground Comprehensive Plan Designations - Preferred Alternative

- |  |  |
|--|--|
| <span style="background-color: yellow; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Urban Low Density Residential (UL)          | <span style="background-color: orange; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Mixed Use (MU)              |
| <span style="background-color: gold; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Urban Medium Density Residential (UM)         | <span style="background-color: lightgreen; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Parks/Open Space (P/OS) |
| <span style="background-color: brown; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Urban High Density Residential (UH)          | <span style="background-color: gray; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Airport (A)                   |
| <span style="background-color: pink; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Downtown (D)                                  | <span style="background-color: yellow; border: 2px solid black; display: inline-block; width: 15px; height: 10px;"></span> Designation Changes         |
| <span style="background-color: red; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Commercial (C)                                 | <span style="border: 2px solid black; display: inline-block; width: 15px; height: 10px;"></span> Battle Ground City Limits                             |
| <span style="background-color: darkred; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Regional Center (RCC)                      | <span style="border: 1px dashed black; display: inline-block; width: 15px; height: 10px;"></span> Urban Growth Area                                    |
| <span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Business Park/Employment Campus (IC/EMC) | <span style="border-bottom: 2px solid black; display: inline-block; width: 15px;"></span> State Routes   |
| <span style="background-color: cyan; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Light Industrial (ML)                         | <span style="border-bottom: 1px solid black; display: inline-block; width: 15px;"></span> Roads  |



Source: Clark County GIS; BERK 2021.

### Exhibit 3. Preferred Alternative Zoning Changes



#### Battle Ground Zoning - Preferred Alternative

- |                               |                                     |
|-------------------------------|-------------------------------------|
| Zoning Change Highlight       | Residential (R16)                   |
| Battle Ground City Limits     | Residential 20 units/acre (R20)     |
| Urban Growth Area             | Regional commercial (RC)            |
| <b>City Specific Zoning</b>   | Downtown commercial (D)             |
| Residential 3 units/acre (R3) | Neighborhood center commercial (NC) |
| Residential 5 units/acre (R5) | Community commercial (CC)           |
| Residential 7 units/acre (R7) | Mixed use (MX)                      |
| Residential-10 (R10)          | Light industrial (ML, EC)           |

- County Zoning**
- Single-Family residential (R1-20)
  - Single-Family residential (R1-10)
  - Single-Family residential (R1-6)
  - Single-Family residential (R1-5)
  - Residential (R-12)
  - Residential (R-18)
  - Removed from UGA

Map Date: Jun 2021

Source: Clark County GIS; BERK 2021.



## Land Capacity

Battle Ground has been working with Clark County in determining an appropriate growth target, and housing, population, and jobs allocation for the city. Clark County has developed a Vacant Buildable Land Model (VBLM), which informed housing and job targets for the each jurisdiction within the county. Battle Ground has adopted a Land Use Master Plan (LUMP) in 2021, with a preferred alternative for adoption as part of their comprehensive plan update. There are some differences in calculation for housing and job capacity between the county and the city. The VBLM from the county shows less buildable acres than the LUMP. Furthermore, the city has shown higher achieved densities. The City’s preferred alternative shall be informed by the LUMP, which has been developed through community engagement, and council review. The LUMP preferred alternative calls for about 9,418 households and 8,260 jobs assuming the land use/zoning and UGA boundary changes are implemented from 2020 – 2045. To account for the time period of 2020-2023, the number housing units was subtracted from 2020 – 2023 to determine a net housing capacity for the LUMP (8,264 units). The Clark County VBLM identifies a housing unit growth target of 9,362 housing units, and an employment allocation of 7,449 jobs through 2045.

A detailed Land Capacity Analysis (LCA) was conducted with zone-specific residential, and job achieved densities from the LUMP, along with current zoning map of Battle Ground. It provides an overview of Battle Ground’s capacity for housing and jobs, based off the city’s current regulations- a no action alternative. However, the LCA currently works within the city’s current UGA, not the preferred alternative from the LUMP. Initial results show the city’s gross capacity for housing and jobs below (see Exhibit 4, below).

### Exhibit 4. Gross Housing and Job Capacity City plus UGA

Category	VBLM Capacity (Base Year 2023. Published 4/17/2024)	LUMP Capacity (6/2021) *	Housing Production 2020-2023	Net LUMP Housing Capacity (2023-2045)	Growth Target Allocation (2023-2045)	LCA Gross Capacity 2024	LCA Net Capacity
Housing (# of units)	9,362	9,418	1,154	8,264	6,979	6,142	Pending
Jobs (# of jobs)	7,677	8,260	-	-	9,249	5,701	Pending

\* The LUMP provides capacity for housing and jobs, assuming the UGA adjustment.

Source: BERK 2024

Gross capacity looks at the total number of households and jobs Battle Ground can accommodate when fully built out. It assumes we hit the maximum number of households and jobs if each zone was built out to highest achieved density. Next steps for the LCA will be to finalize calculations for net housing and jobs capacity to create a full narrative for Battle Ground’s No Action Alternative (LUMP including city changes only). An Action Alternative will be developed (LUMP UGA change plus upzoning for employment and housing such as with middle housing) to ensure the city can

meet the allocation targets from the VBLM and LUMP housing and job targets for 2045. Key next steps to meet housing and job targets are highlighted in the subsequent sections.

## Planning For Housing

Battle Ground will be updating its housing element as required by the Growth Management Act, including the need to accommodate housing for all income levels as required by House Bill 1220.

Battle Ground will engage with citizens, stakeholders, and elected official to explore options. This may include, but is not limited to:

- Upzoning
- Increasing density
- Introducing a variety of middle house types in all or certain zoning districts

Battle Ground will be relying on guidance provided by the State Department of Commerce. As we engage these housing options, our Land Capacity Analysis will need to be adjusted to reflect any changes.

## Planning For Jobs

Battle Ground aims to add jobs through several key strategies. This may include, but is not limited to:

- Annexation- Battle Ground will annex Dollar's corner, along the city's western boundary to add additional jobs and rezone to commercial uses. Exhibit 2 shows the proposed annexation through the comprehensive plan update.
- Rezoning areas around the Airpark District to commercial and industrial uses
- Updating the city's economic development strategy

## Airpark District

The City of Battle Ground initiated an Airpark Land Use Compatibility Study as part of its 2025 -2045 Comprehensive Plan Update. The goal of this process is to consider introducing density or new land uses within this area. At minimum, this could mean an expansion of allowable uses within the Airpark District, or at most it could involve a Comprehensive Plan Map amendment together with a zoning change to some or all properties. Because this is a live discussion among the property owners and the City Council, we do not have any specific direction currently. We would like to make the County aware of this active planning effort, and to consider the possibility of the intensification of uses or density within the Airpark District and for this consideration to be included in the Draft EIS.

### Exhibit 5. Properties Map



### Basic Ownership Information

Map #	Parcel ID Number	Property Owner	Acreage	Comp Plan	Zoning	Existing Use/Bldgs
1	194372006	MW Eaton LLC	5.32	Light Ind.	ML	Residential
2	194372007	Robert J McNeal	3.89	Light Ind.	ML	Residential
3	194319000	Jeffrey Dale and Rebeca Marie Lawson	13.41	A	Airport/Residential	Vacant
4	194557000	Jeffrey Dale and Rebeca Marie Lawson	14.13	A	Airport/Residential	Vacant
5	194630000	At the Barns LLC	8.24	A	Airport/Residential	Agricultural Bldgs
6	194583000	Patrick S and Mary C Pursley	1.43	A	Airport/Residential	Residential
7	194626000	Stuart M and Patricia A Davis	5	A	Airport/Residential	Residential
8	194627000	Dennis and Deborah Wise	5	A	Airport/Residential	Residential
9	194625000	Paul G and Bernadette Lee (Trustee)	5.03	A	Airport/Residential	Residential
10	194407000	Lee and Debbie Levanen	5.03	A	Airport/Residential	Residential
11	194410000	Lee and Debbie Levanen	5.17	A	Airport/Residential	Vacant w Trailer
12	194420000	John D and Kathryn M McAleer	5	A	Airport/Residential	Residential
13	194419000	John D and Kathryn M McAleer	5	A	Airport/Residential	Vacant
14	194418000	Selmer E and Carolyn R Dronen	6.23	A	Airport/Residential	Residential
		<b>Total Acreage</b>	<b>87.88</b>			
		LI Zoned Acreage	9.21			
		Airport/Residential Zoned Acreage	78.67			

Please note, Properties 1 and 2, zoned Light Industrial are not considered for any changes. Only the (brown highlight) Airpark District Properties #3-#14.



## Site Specific Requests

In addition to the Urban Ground Boundary Adjustments proposed in the LUMP reference above, the following site-specific amendments will be considered as part of our Growth Alternatives. After further analysis for housing and jobs, Battle Ground will make a recommendation on these site-specific requests. We do ask they be included into the Draft Environmental Impact Study for consideration at this time.

Request #1 – Inclusion in UGA – Property Owner initiated.

Recommended Comp Plan Designation: Low Density Residential

Recommended Zone: R5

Property Owner:

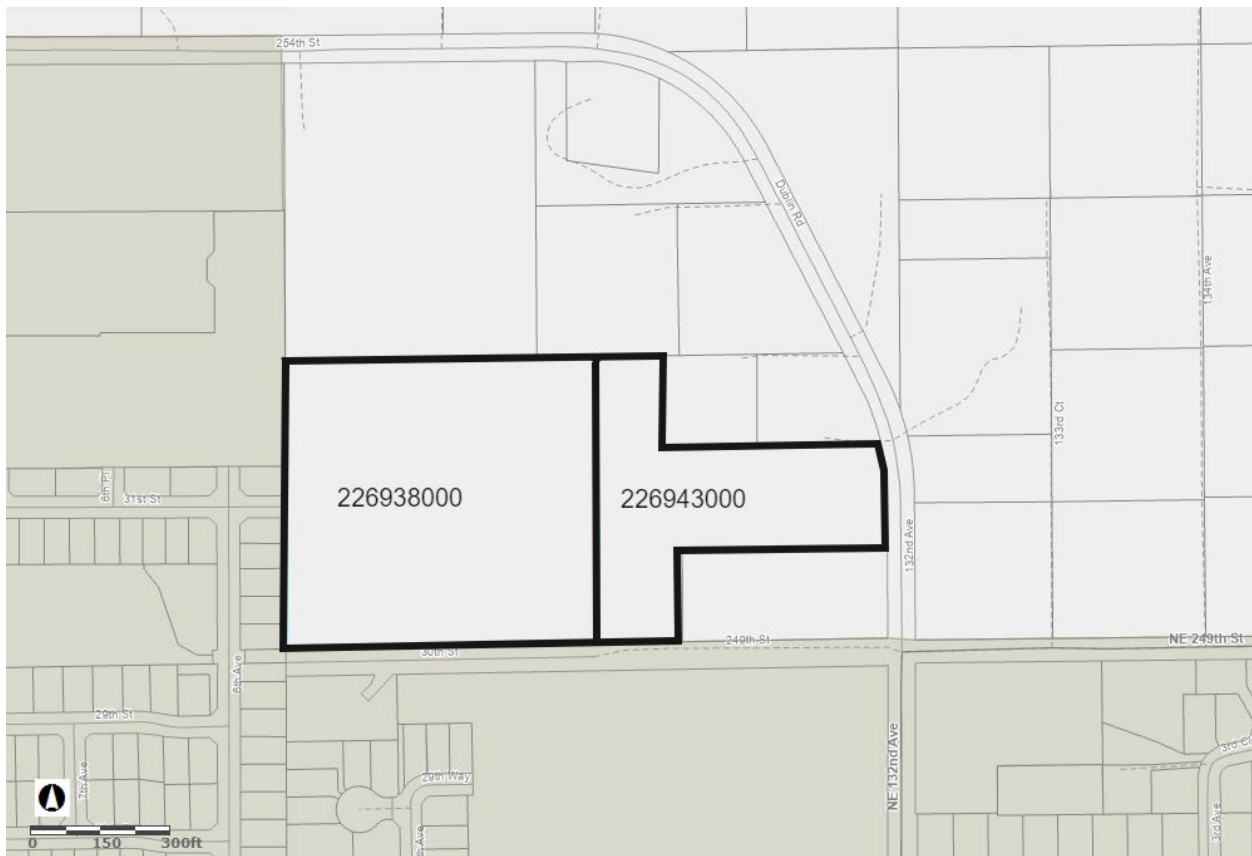
MARTIN S MILLER & NANCY J MILLER REV TRUST  
2701 N TUMBERRY WAY  
MERIDIAN ID, 83646

Parcel # 226938000

Property Owner:

HALDEMAN JOSHUA  
25012 NE DUBLIN RD  
BATTLE GROUND WA, 98604

Parcel # 226943000



Miller/ Haldeman Correspondence:



March 25, 2024

Mr. Sam Crummett  
Community Development  
City of Battle Ground  
109 SW 1<sup>st</sup> Street, Suite 127  
Battle Ground, WA 98604

Re: City of Battle Ground Growth Boundary Inclusion of 12818 NE 249<sup>th</sup> Street and 25012 NE Dublin Road

Dear Sam,

I am writing to request your consideration of including the above referenced properties, as part of the City of Battle Ground's Residential Growth expansion. Both properties run parallel to the NW 30<sup>th</sup> Street subdivision, and would help to tie-in and connect existing roads and utilities with the River Bend and Wapiti subdivisions.

There is an additional property located at 13014 NE 249<sup>th</sup> Street owned by Phil Newell. Phil had expressed interest in the past of having his property included in any future expansion discussions, however, we have been unable to make contact with him, to know his current position.

As a follow up to the above request, we are also very interested in helping the City achieve its middle housing targets of providing a diverse spectrum of housing options for a variety of income levels and housing needs. We would be more than willing to discuss potential zoning options in greater detail, that are in alignment with the City's long-term goals.

If you or your colleagues would like to discuss any of this information in greater detail, please let me know and Josh and I will make ourselves available to you. I can be reached at 360-600-9915, and Josh can be reached at 360-608-2034. Your consideration of this request is greatly appreciated.

Sincerely,

Marty S. Miller  
12818 NE 249<sup>th</sup> Street  
Battle Ground, WA 98604

Josh Haldeman  
25012 NE Dublin Road  
Battle Ground, WA 98604

Request #2 – Inclusion in UGA – requested by State Department of Natural Resources

Recommended Comp Plan Designation: Low Density Residential

Recommended Zone: R5

Property Owner:

Washington State Department of Natural Resources  
PO BOX 47014  
OLYMPIA WA, 98504

Parcel #s 229188000, 229199000, 229195000, 229196000

Request #3 – Inclusion in UGA - City Initiated

Reason: The City owns this property, and its public water towers are on this parcel.

Recommended Comp Plan Designation: Parks/Open Space

Recommended Zone: R5

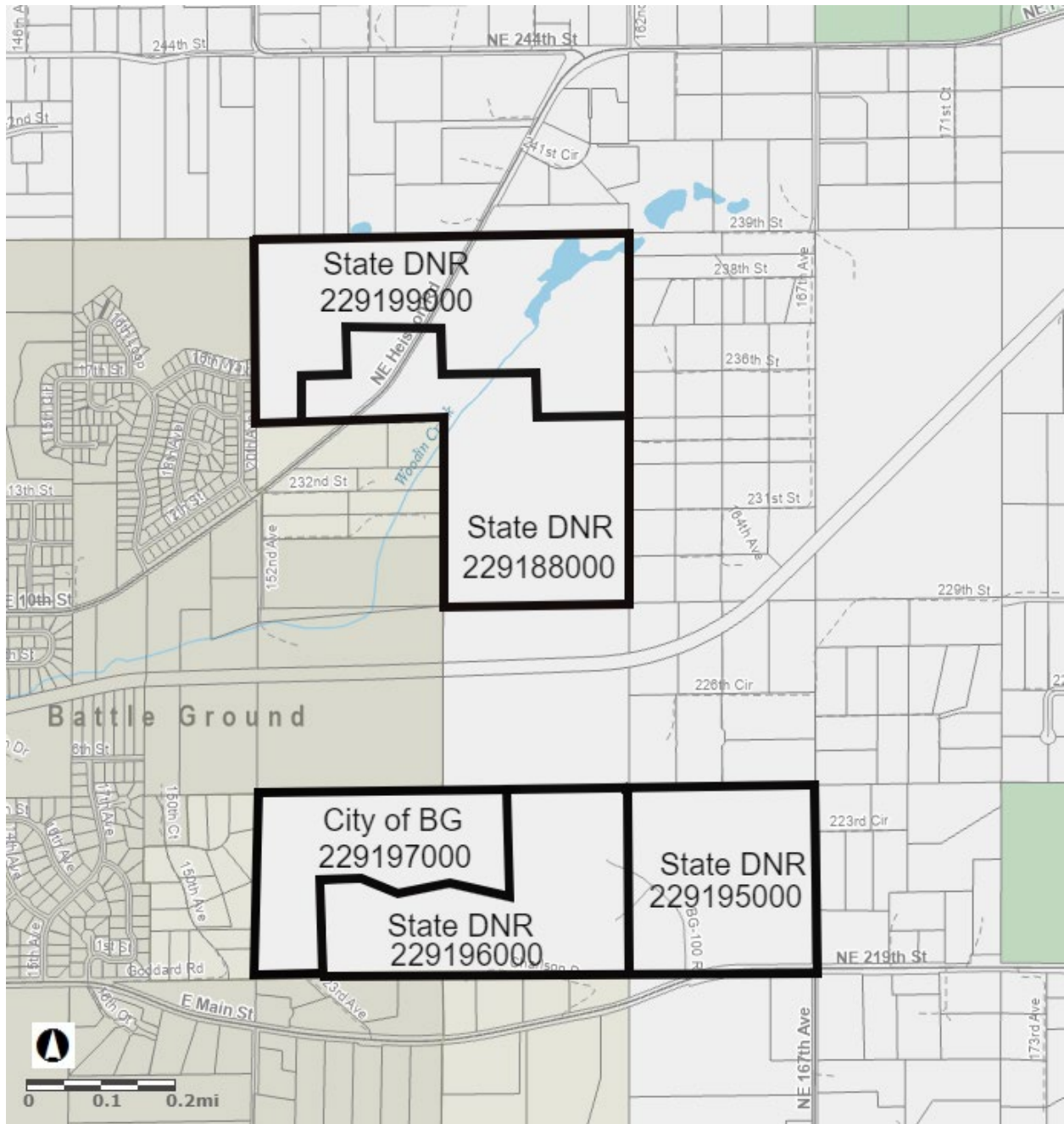
Property Owner:

City of Battle Ground  
109 SW 1ST ST  
BATTLE GROUND WA, 98604

Parcel # 229197000

Map on following page





Request #4 – Inclusion in UGA

Recommended Comp Plan Designation: Low Density Residential

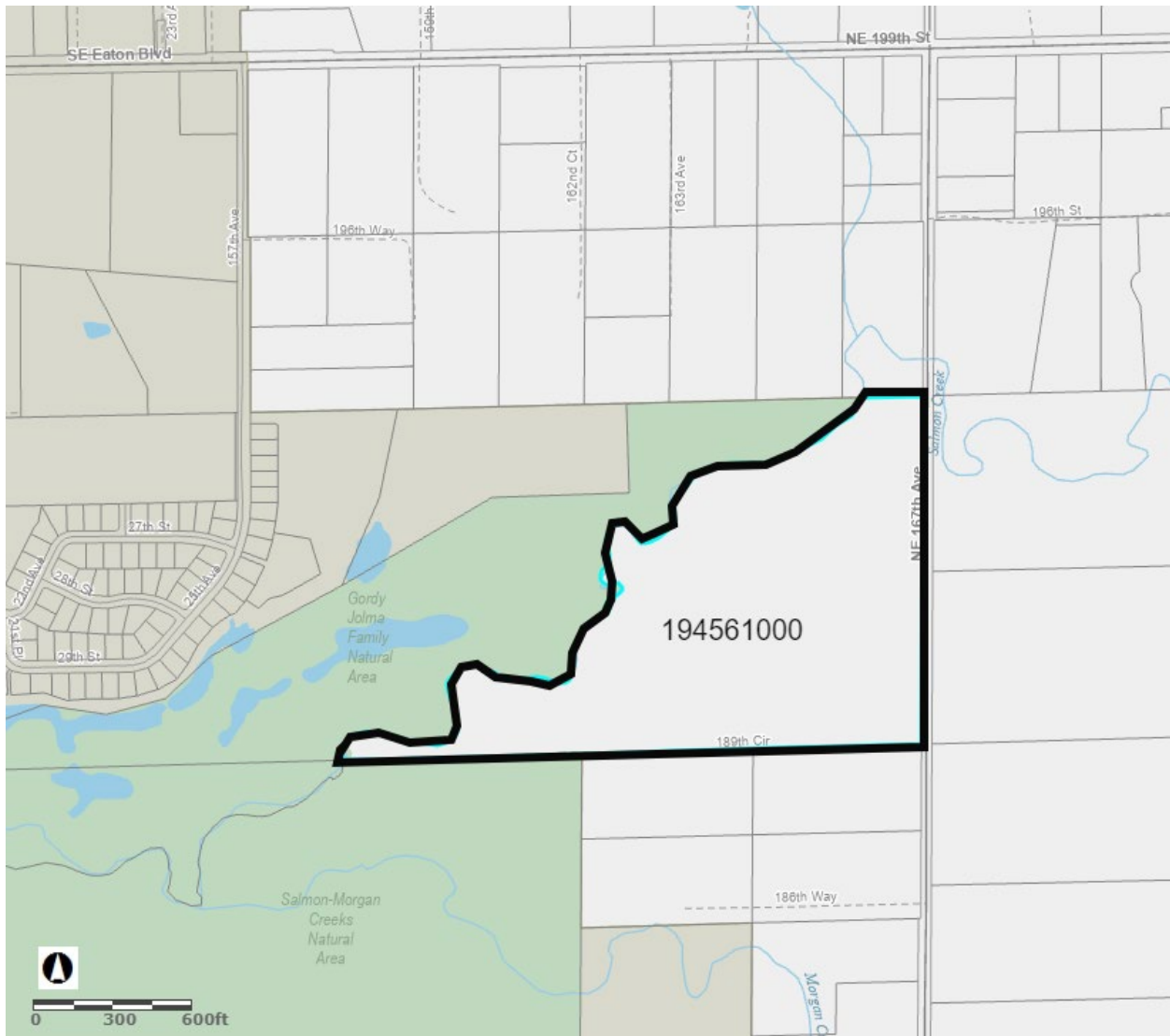
Recommended Zone: R3

Property Owner:

Kalian Jean

16205 NE 189TH CIR, BRUSH PRAIRIE, WA 98606

Parcel # 194561000



Correspondence:

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**From:** Terrence Danysh <[tdanysh@prklaw.com](mailto:tdanysh@prklaw.com)>  
**Sent:** Wednesday, July 10, 2024 3:30 PM  
**To:** Sam Crummett <[sam.crummett@cityofbg.org](mailto:sam.crummett@cityofbg.org)>  
**Subject:** [External] -Kalian Trust Property/Parcel No. 194561000/16205 NE 189th Cir., Brush Prairie, WA 98606--  
REQUEST FOR CONSIDERATION OF INCLUSION IN CBG UGA PER "PERIODIC REVIEW PROCESS" UNDER GMA  
**Importance:** High

Hi Sam:

It was good speaking with you yesterday. As I indicated in that call, I represent the property owner of the above-referenced property just outside the City of Battle Ground's current UGA.

As we discussed, I understand the City is currently in the midst of its "periodic review" process under the GMA for submitting its proposal(s) to Clark County for the latter's review and vote by the end of 2025. I'd like to respectfully request that the above-referenced property be included on the list of properties you're developing for possible consideration as additional residential density.

I recognize that the City is looking at maximizing its job-development capacity, but we think there's value in considering where the City will grow residentially over the next 10+ years as well. Given the state's recent "middle housing" legislation mandating preparation of communities like Battle Ground (which is on the cusp of the 25K population trigger) to plan for that growth by increasing densities, our client's property could serve that purpose well (given its location, availability of utilities, etc.).

If you need more information to include me on the mailing/distribution list for any issues arising from the City's current "periodic review" (including but not limited to meetings, announcements, milestones, Clark County communications, etc.), I'm happy to provide it. Otherwise, I'd appreciate being identified and included as a party of record for this process.

Thank you for the courtesy of your consideration. Please let me know that you've received this and intend to include our client's property for the purposes of the process identified above. I recognize that inclusion of the property per the request above does not guarantee any particular outcome, but I do want to make sure we're able to participate as parties of record.

Thanks again. Best regards,

Terry

**TERRENCE DANYSH | PRK Livengood  
OF COUNSEL**



Request #5 – Inclusion in UGA – Property Owner initiated.

Recommended Comp Plan Designation: Light Industrial (ML)

Recommended Zone: Westside Employment

Property Owner:

ORNELAS MIGUEL & ORNELAS PAULA  
17608 NE 122ND AVE, BATTLE GROUND, WA 98604

Parcel # 195246000

