From: Jeffrey Delapena
To: Sam Crummett; Oliver Orjiako; Jose Alvarez; Jenna Kay; Rebecca Messinger
Cc: Kristin Lehto; Robert Ferrier
Subject: RE: Comment Letter from Battle Ground
Date: Tuesday, September 29, 2026 1:43:00 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

Good day, Sam,

Thank you for submitting the City of Battle Ground's comments related to the 2025 Comprehensive Plan update ahead of the Oct. 1st Council Hearing

These will be added to the Comprehensive Plan Index of Record. The Clerk to the Board, Rebecca Messinger, is already included on this email and can share with the Council.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Sam Crummett <sam.crummett@cityofbg.org>
Sent: Tuesday, September 29, 2026 1:37 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Jenna Kay <Jenna.Kay@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Cc: Kristin Lehto <Kristin.Lehto@cityofbg.org>; Robert Ferrier <Robert.Ferrier@cityofbg.org>
Subject: RE: Comment 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.

Please use this one – same letter, just changed the file name date to 2026 rather than 2006!

Sam

From: Sam Crummett
Sent: Tuesday, September 29, 2026 1:33 PM
To: Oliver Orjiako <oliver.orjiako@clark.wa.gov>; Jose Alvarez <jose.alvarez@clark.wa.gov>; Jeff Delapena <jeffrey.delapena@clark.wa.gov>; Jenna Kay <jenna.kay@clark.wa.gov>; Rebecca Messinger <rebecca.messinger@clark.wa.gov>
Cc: Kristin Lehto <Kristin.Lehto@cityofbg.org>; Robert Ferrier <Robert.Ferrier@cityofbg.org>
Subject: Comment Letter from Battle Ground

Hello Oliver and staff,

Could you please direct this letter to the County Council/ Clerk to be placed in the Record for the upcoming October 1, 2026 meeting – Comprehensive Plan Update.

Thank you,
Sam

SAM CRUMMETT, AICP
Planning Supervisor
City of Battle Ground
109 SW 1st Street | Battle Ground, WA 98604
360.342.5042 (office)
Website | Facebook | Instagram | X

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City of Battle Ground

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

September 29, 2026

Honorable County Councilors,

Sue Marshall, Chair
Glen Yung
Michelle Belkot
Wil Fuentes
Matt Little

On behalf of the City of Battle Ground, we appreciate the opportunity to provide the following comments and recommendations regarding the Comprehensive Plan Update and Preferred Alternative. Battle Ground has undertaken a multi-year planning process to evaluate its long-term growth needs, land capacity, infrastructure, and community priorities. The information and analysis summarized in this letter are intended to provide the County Council with the City's perspective and the planning basis for its recommended growth strategy.

The City Battle Ground concurs with Clark County Planning Commission's September 3, 2026 recommendation to approve map recommendations 1, 2, and 3, along with minor amendments 26 and 27, as noted in the decision-making table below.

Map Recommendations

Number	Proposed Land Use Plan	Planning Commission Recommendation 9/3/2026
1	**Battle Ground UGA:** Expand UGA towards Dollar's Corner for additional employment capacity.	Motion to Approve: AYE – 6; NAY – 1 **Motion Passed**
2	**Battle Ground UGA:** Expand UGA to the north for additional residential capacity.	Motion to Approve: AYE – 6; NAY – 1 **Motion Passed**
3	**Battle Ground UGA:** Remove southwestern portion of the UGA.	Motion to Approve: AYE – 5; NAY – 2 **Motion Passed**
26	**Battle Ground UGA** Expand UGA to include 35-acre property (2291970000) owned by the City of Battle Ground containing water reservoirs. This was previously included in Alt. 3 and was included in the DEIS.	Motion to Approve: AYE – 7; NAY – 0 **Motion Passed**
27	**Battle Ground UGA** Expand the UGA to include three properties totaling 17 acres for urban low density residential land. This was previously included in Alt. 3 and was included in the DEIS. 226938000; 226943000; Correction Note: Parcel 226988000 was not included in Alt. 3 and was not included in the DEIS.	Motion to Approve: AYE – 4; NAY – 3 **Motion Passed**

This letter provides a summary of the City of Battle Ground's goals and recommendations for the periodic review update. It also addresses the Washington State Department of Commerce letter directed to Chair Marshall, dated September 9, 2026 (draft) and September 22, 2026 (final).

The City was not provided with a copy of the Department of Commerce letter when it was initially distributed to other jurisdictions for review and comment. City staff first became aware of the letter on September 25, 2026. As a result, Battle Ground has had a limited opportunity to review and respond to the State's comments compared with other jurisdictions whose comments are currently included in the Record. Notwithstanding the abbreviated timeframe, the City has carefully reviewed the State's comments and is providing the information below to clarify the basis for Battle Ground's proposed amendments and the planning, analysis, and review that have informed the City's recommendations.

Battle Ground's multi-year Planning Strategy

One of Battle Ground's primary goals in this periodic review is to expand its Urban Growth Area (UGA) to the Dollars Corner area to accommodate future employment growth. This proposal is the culmination of a long-term vision and multi-year planning strategy that began more than 25 years ago.

2000 – Establishing a 50-Year Vision. In the summer of 2000, the City of Battle Ground initiated a community visioning process that resulted in the "50 Year Vision for the City of Battle Ground, Washington." The vision included a conceptual growth map showing Battle Ground growing to the west and south. Its guiding principle stated: *"Future growth should occur primarily to the west and south and will occur in all directions consistent with the 50-year vision."*

2015 – Initial UGA Expansion Request. During the City's 2015 periodic update, Battle Ground proposed an 82-acre UGA expansion west of the City, toward the Dollars Corner area, to accommodate employment growth. The request was challenged before the Growth Management Hearings Board on appeal (Case No. 16-20005c). The Hearings Board found that the City's existing UGA contained a surplus of residential land and raised questions regarding the City's density calculations. Although Battle Ground's proposal was focused on employment land, the City ultimately chose to withdraw the UGA expansion request and use the next periodic review cycle to further evaluate the plan for its employment land needs.

2018–Present – A Deliberate, Multi-Year Planning Strategy. In 2018, Battle Ground began multi-year planning strategy to more comprehensively evaluate the City's future growth needs and establish a foundation for the next periodic review. The City initiated a community visioning exercise designed to chart a direction for Battle Ground's future. A group of citizen volunteers, known as the Navigators, helped guide this effort and develop a shared vision for the community.

The resulting *City Vision and Strategic Action Plan* was adopted in 2019 and identified several planning efforts necessary to implement that vision, including:

- Land Use Master Plan (2021)
- Shoreline Master Plan Update (2021)
- Housing Action Plan (2021)
- Transportation System Plan (2021) (Updated 2026)
- Parks, Recreation, Open Space Plan (2022)

These plans provided the City with updated information, community input, policy direction, and technical analysis to inform decisions about future growth. As illustrated in the Pyramid Action Items below, these individual planning efforts were intended to build upon one another and ultimately inform the City's Comprehensive Plan periodic review.

The proposed UGA expansion to the Dollars Corner area is therefore not a stand-alone request, but the next step in a long-term planning process that has been underway for decades.

Pyramid Action Items



Land Use Master Plan

The Land Use Master Plan (2021) is a foundational planning document supporting Battle Ground's UGA expansion. The plan provides the technical analysis necessary to evaluate the City's land capacity and ability to accommodate projected residential and employment growth consistent with the Growth Management Act (GMA), including RCW 36.70A.115. As part of this work, the City completed an extensive land capacity analysis, including an

evaluation of the “reasonable measures” available to address identified capacity needs (RCW 36.70A.215). A key finding was that Battle Ground had approximately 80 acres of net developable light industrial land available to accommodate future employment growth. The analysis demonstrated that the City’s existing land supply would not provide sufficient capacity to meet its employment growth targets without additional land.

The Land Use Master Plan therefore identified the need to consider additional employment land as part of the City’s long-term growth strategy. The proposed UGA expansion toward the Dollars Corner area is intended to address this identified need and provide additional capacity for employment growth. Providing adequate employment capacity also supports the City’s broader goals of creating opportunities for jobs closer to where residents live, reducing the need for longer commutes, and supporting more efficient patterns of growth. The Land Use Master Plan, along with the City’s other supporting planning documents and technical analyses, is included in the Record for consideration in this decision-making process.

The Land Use Master Plan and other supporting plans are included in the Record in this decision-making process via the City’s box link available here: https://cityofbg.box.com/s/gsvfmsvjc5oquz6yiooqvrsgoivujtnk

Battle Ground’s Preferred Growth Alternative
The proposed UGA adjustments are primarily intended to provide additional capacity for employment growth while maintaining sufficient capacity to accommodate the City’s residential growth allocation.

The Preferred Alternative expands the UGA west toward the Dollars Corner area by approximately 450 gross acres. This expansion would bring the existing commercial center into the UGA and provide additional land to accommodate future employment growth. The area has already benefited from state investment in transportation infrastructure, providing an established location for future employment and commercial development. Its location also provides an opportunity to accommodate commercial, freight, and shipping activity outside of Battle Ground’s central city area.

The Preferred Alternative also removes approximately 330 gross acres in the Meadow Glade area from the current UGA. Based on existing development patterns, infrastructure availability, and the City’s analysis of development potential, this area is not anticipated to develop within the 20-year planning horizon. Removing this area from the UGA allows the City to focus future residential growth within areas that are more suitable and capable of accommodating development and associated infrastructure.

Taken together, these adjustments reflect a more focused approach to future growth - adding land where the City has identified a need for employment capacity while refining the UGA boundary in areas where development is less likely to occur during the planning horizon.

Land Capacity Analysis

The City's Land Use Master Plan, refined through the periodic review process, includes a comprehensive land capacity analysis evaluating the City's ability to accommodate its assigned growth. Based on this analysis, Battle Ground demonstrates sufficient capacity to accommodate approximately 8,056 housing units and 8,594 jobs over the 2025–2045 planning horizon.

This analysis provides the basis for the City's conclusion that the Preferred Alternative can accommodate the City's assigned residential and employment growth while supporting a more efficient and intentional pattern of future development.

	Allocation	Action Capacity	Add-ons	Surplus/Deficit
Housing	6,979	8,056	410	1,487
Employment	8,859	8,594	1,183	918

Add-ons	
ADU (5% of Action)	410
Construction jobs	767
WFH jobs	416

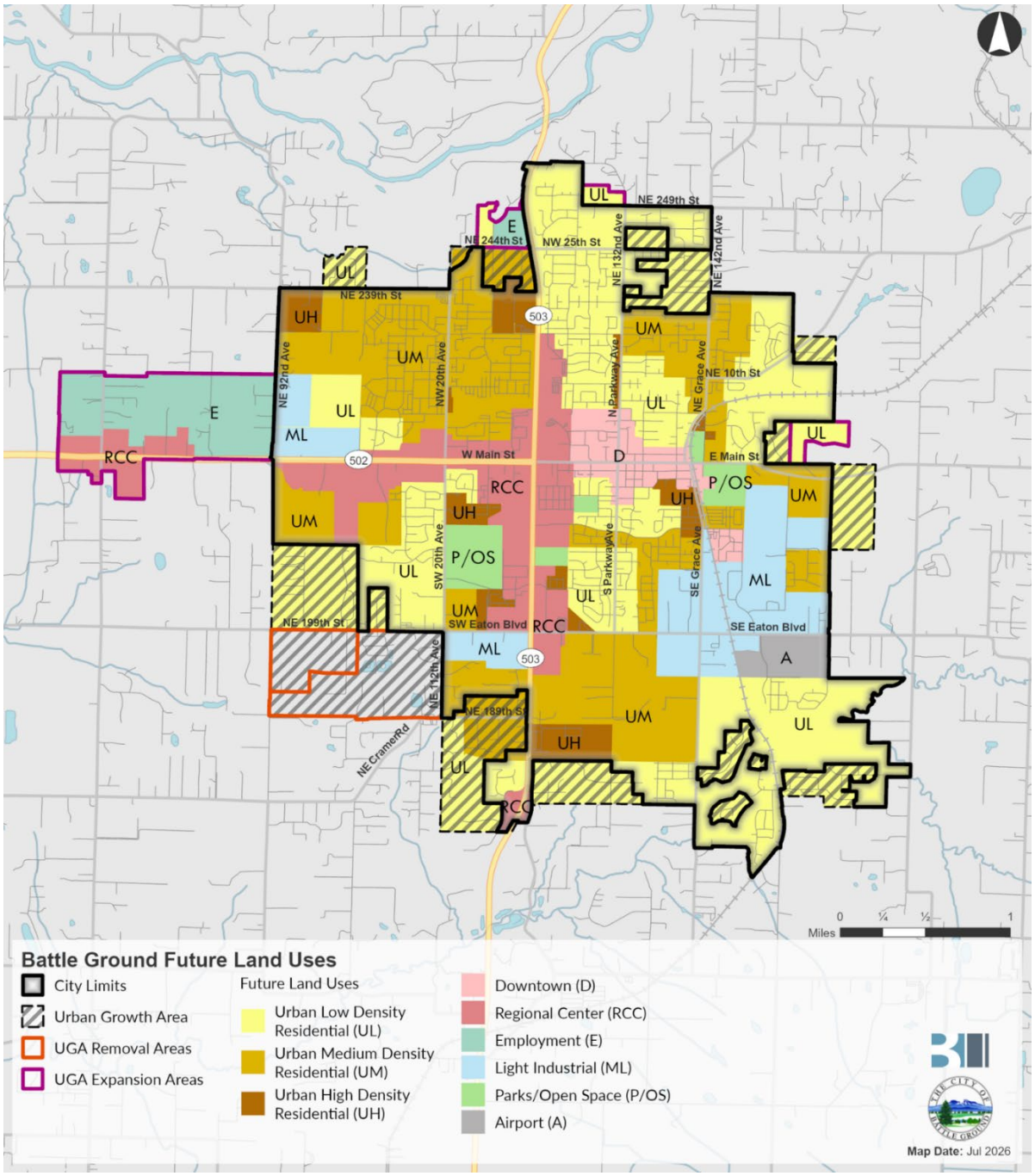
Preferred Alternative Growth Map

Battle Ground's Preferred Alternative is shown on the following page. In addition to the proposed UGA adjustments described above, the Preferred Alternative includes two minor amendments requested by the City to address infrastructure and utility needs. These amendments were supported in the Clark County Planning Commission's September 3, 2026 recommendation.

It is important to note that the Battle Ground maps included in the Clark County Council packet do not reflect the Clark County Planning Commission's September 3 recommendation. The maps on the following page reflect the Preferred Alternative as recommended by the Planning Commission.

Additional information and justification for the two requested infrastructure and utility adjustments are provided in Attachment A of this letter.

Growth Map. Preferred Alternative as recommended by the Clark County Planning Commission 9/3/26



Please accept the City of Battle Ground's Comprehensive Plan, Preferred Alternative, and supporting capital and planning studies for inclusion in the Record. These materials are available at the following link:
https://cityofbg.box.com/s/gsvfmsvjc5oquz6yiooqvrsgoivujtnk

The City appreciates the County's staff support, collaboration, and work throughout this process, as well as the time and consideration given to reviewing Battle Ground's proposed growth strategy. We appreciate the opportunity to participate in this process and to provide the planning work and analysis supporting the City's recommendations.

On behalf of the City of Battle Ground, we respectfully request that the County Council **make a motion to support Battle Ground's Comprehensive Plan (2025–2045) and Preferred Alternative, and to concur with the Clark County Planning Commission's September 3, 2026 recommendation to approve map recommendations 1, 2, and 3, along with minor amendments 26 and 27, as identified in the decision-making table.**

Sincerely,



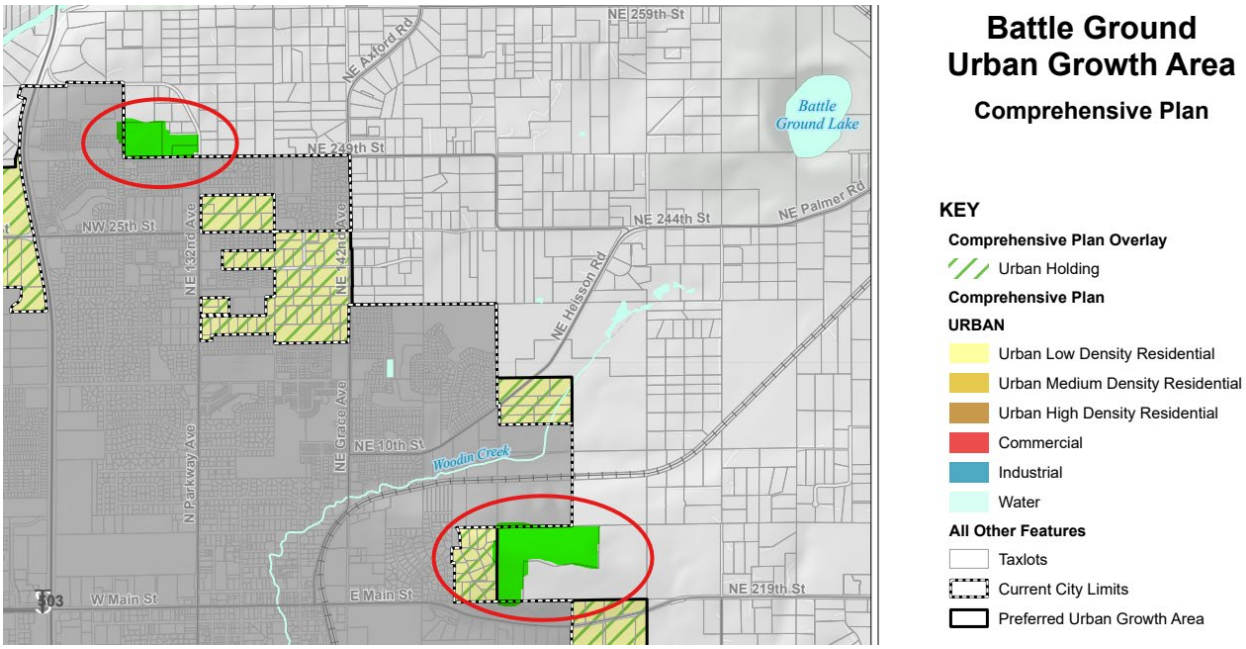
Sam Crummett, AICP
Planning Supervisor

C: Interim City Manager, Rob Ferrier
Community Development Director, Kristin Lehto

Attachment A – Findings supporting Amendments #26 and #27

Attachment A

Figure 1. Requested Amendments #26 and #27



Recommendation #26

1. This request would add parcel 229197000 to the City's UGA (35 acres) (Figure 3). This is a City of Battle Ground-owned parcel containing the City's water reservoirs. Including this property would create efficiencies in decision-making and permitting. This parcel would be designated as Urban Low-Density Residential with an R3 zoning designation. Based on an existing restrictive covenant on this parcel, and city policy, no residential units would be built on this parcel.

Figure 2. Parcel Map. #26

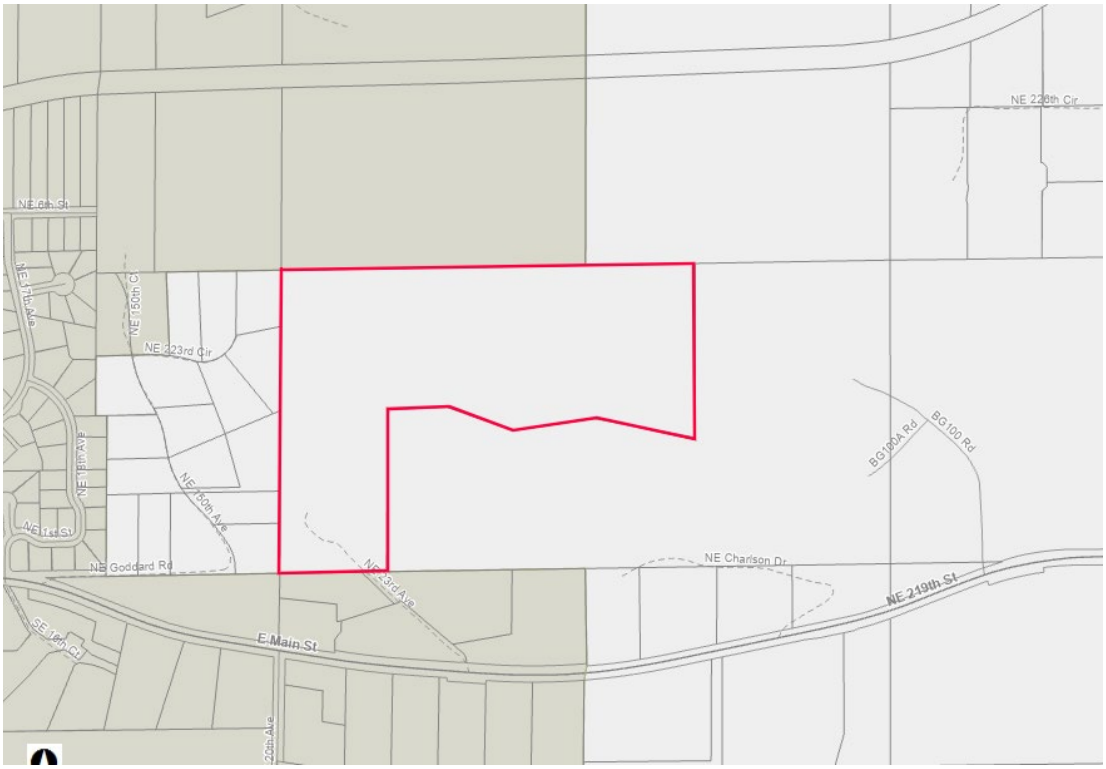


Figure 3. Air Photo #26



Figure 4. City Water Reservoirs #26



Amendment #27

1. This amendment would add three parcels: 226938000 (Miller), 226943000 (Haldeman), and 226988000 (Newell) into the proposed Urban Growth Area (17.04 total acres). These parcels would be designated as Urban Low-Density Residential with an R7 zoning designation. This request is to facilitate the completion of a half-street improvement by allowing for residential development to move forward in this area under city standards.

Figure 5. Parcel Map #27

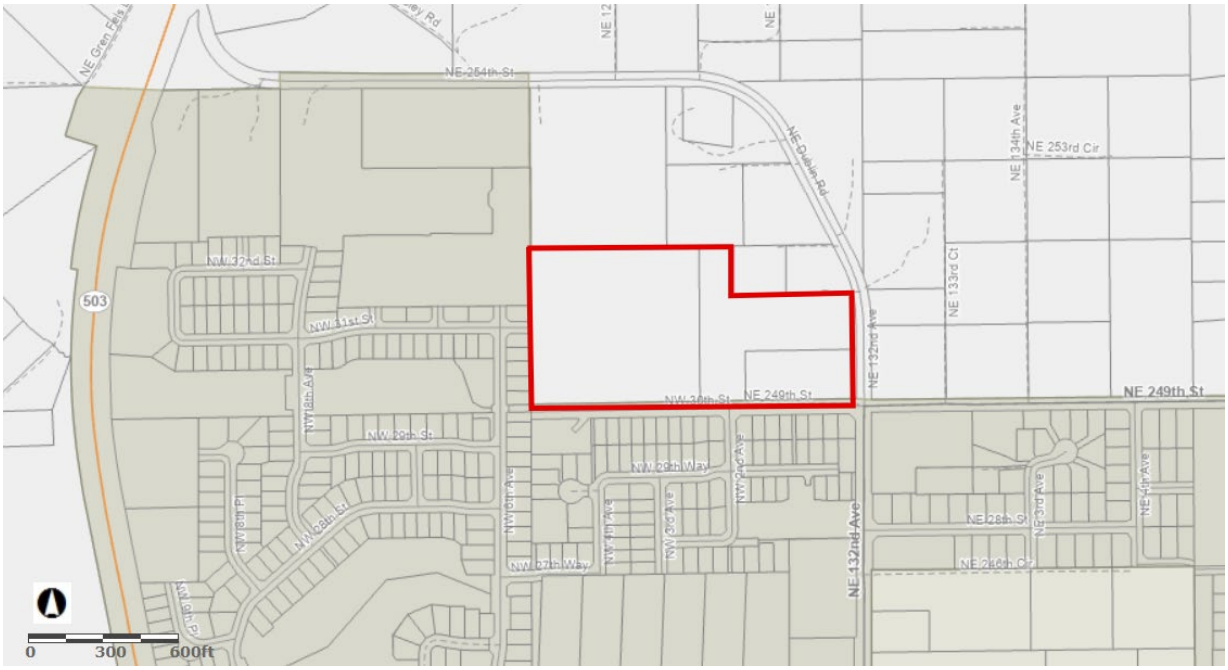


Figure 6. Air Photo. #27

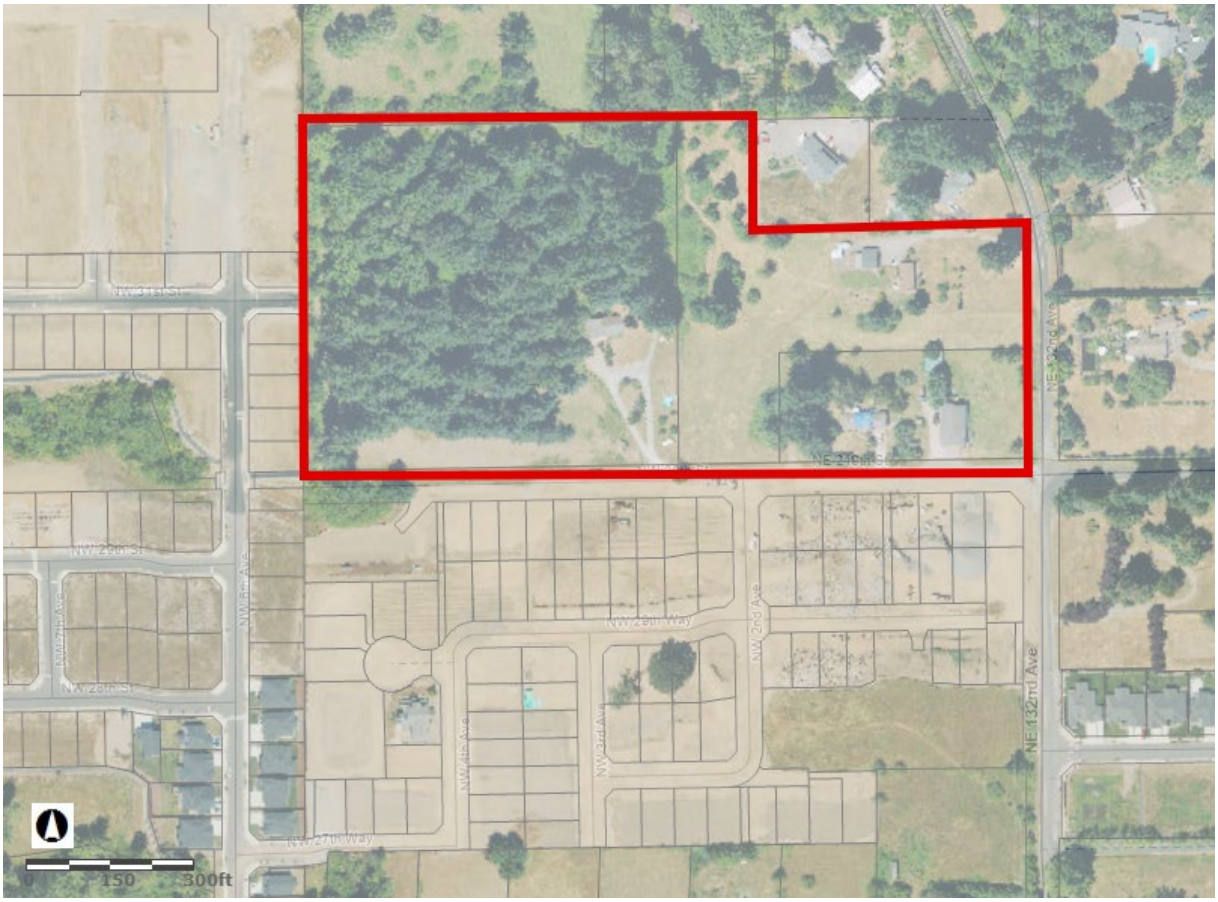


Figure 7. View to the West, showing half-street. #27

