

From: [Alan Peters](#)
To: [Connie Acker](#)
Subject: Comments on Urban Area Boundary Revision Redlines
Date: Monday, May 11, 2020 5:44:02 PM

Gorge Commissioners,

The proposed Urban Area Boundary Chapter edits that will be discussed by the Gorge Commission at its May 12th meeting include significant changes in policy that will have long-term consequences for Gorge communities. While I do not expect that Skamania County will seek revisions of urban areas within its boundaries in the near future, I am concerned that the proposed policies do not provide for the clear and concise standards or process that Gorge 2020 has strived for. To the contrary, the proposal leaves open the question of whether a request to revise an urban area boundary in Skamania County might be considered at all and if considered, what standards might be applied to such a request.

For example, in addition to questions raised by policies #1 and #5, draft policy #6 states that the Commission “will only consider applications to revise Urban Area boundaries in conjunction with state-required periodic plan updates or other times expressly specified in state law for revising urban growth or urban area boundaries.” There are no such state-required periodic plan updates or processes for urban area boundary revisions in Washington counties that do not plan under the Growth Management Act. Neither Skamania nor Klickitat counties plan under the Growth Management Act. Clark County contains no NSA urban areas. It is not clear if this policy would preclude any urban area revisions in Washington State.

Many of the proposed policy statements are open-ended or will allow for policy making on a case-by-case basis (e.g., policies 8, 10, 12, 13). Policy #8 would subject urban area revisions in Washington to OAR requirements.

I am confident that with more time, the proposal can be improved to provide the clear standards that both the Gorge Commission and Gorge communities have asked for as part of this process. I request that after Staff’s presentation on the proposal, the Gorge Commission defer any action until the June Commission meeting to allow time for additional public comment on the proposal.

Alan Peters, AICP | Assistant Planning Director
SKAMANIA COUNTY COMMUNITY DEVELOPMENT
170 NW Vancouver Ave | PO Box 1009 | Stevenson, WA 98648
apeters@co.skamania.wa.us | 509.427.3906