



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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June 30, 2020

Columbia River Gorge Commission
Post Office Box 730
White Salmon, Washington 98672

RE: Gorge 2020 Draft Management Plan – Urban Area Policies

Dear Gorge Commissioners:

Thank you for the opportunity to comment on the Gorge 2020 Draft Management Plan. We appreciate the time and effort the Gorge staff and Commission dedicated to the plan update, along with your coordination with our agency throughout the process. Gorge 2020 establishes a strong foundation to preserve and protect the Management Area's scenic qualities, critical wildlife habitats and natural resources while accommodating growing population and recreation demands.

The Gorge 2020 Draft Management Plan provides important updates and clarifications on urban area boundary policies. Washington and Oregon are considered national leaders in regards to our statewide planning frameworks, our protection of lands critical for natural resources, and our urban growth area policies. The draft urban area policies reflect goals and requirements of the Washington Growth Management Act (GMA)¹, and do an excellent job of considering our respective planning frameworks while balancing National Scenic Area priorities.

Urban growth area boundaries constitute a critical tool to limit low-density, sprawling development. Strong policies can protect the natural environment, scenic vistas, quality-of-life, and natural resource industries that are critical to state and regional economies. Urban growth areas also encourage fiscally responsible local planning. A fundamental feature of the GMA is that urban growth areas should provide adequate urban services in a manner that ensures communities can meet the financial obligations that come with new growth. We believe these policies are vital in preserving Washington as a great place to live work and play, and we commend your efforts to update the urban area policies.

¹ RCW 36.70A.020 and RCW 36.70A.110

We have the following suggestions for your consideration.

Policy 5

This policy ties urban area revisions to adequate agency funding at the beginning of each biennial budget. The policy allows the Commission to determine whether one or more urban area boundary adjustment application will be considered during the biennium. The policy does not establish criteria on how the Commission will prioritize multiple applications if funds are not available to consider all applications. We recommend that the management plan include criteria or additional information to inform counties on how the Gorge Commission will prioritize multiple applications.

Policy 6

This policy ties urban area boundary revisions to state-required periodic plan updates. This reflects the recommendation in our administrative rule to defer site-specific urban growth area adjustments to the next periodic update.² Urban growth area amendments require significant resources, and typically include updates to the land use element, the transportation element, capital facilities element and other portions of the comprehensive plan.

The policy also allows applications at other times expressly specified in state law. Although our WAC recommends deferring applications to a periodic update, the GMA allows comprehensive plan updates and urban growth area amendments annually. Periodic reviews are required every eight years,³ however, Skamania and Klickitat counties are “partially planning” under the GMA and do not review urban growth areas as part of their periodic update process. Partially planning counties are only required to review and update resource lands policies and critical areas regulations during the required GMA periodic update. We recommend you continuing working with local stakeholders and clarify language to determine whether you actually want to limit applications to the periodic update, or allow them more frequently based on local changes.

Policy 7

We support continued collaboration and appreciate the opportunity to coordinate with the Gorge Commission to establish appropriate urban area revision processes and identifying relevant state standards.

Policies 10-13

These policies establish the general criteria that counties must show to establish the need to revise urban area. The GMA requires urban growth areas to be served with adequate and available urban facilities and services. We encourage the Commission to add policy language to ensure future urban revisions are subject to the same requirement; that counties and/or cities

² WAC 365-196-310

³ RCW 36.70A.130

must show urban areas are served with public water, sewer and concurrent transportation systems. You might also consider additional language recognizing that boundaries are based on twenty-year growth projections.

Thank you for considering these comments and your continued coordination with our agency. We strongly encourage you to continue working with local governments as you balance local recommendations and new policy provisions to protect the National Scenic Area. If you have any questions or concerns, please contact Scott Kuhta, Senior Planner at (509) 795-6884.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Andersen". The signature is fluid and cursive, with a large initial "D" and "A".

Dave Andersen, AICP
Managing Director
Growth Management Services

DA:SK:lw

cc: Scott Kuhta, AICP, Senior Planner, Growth Management Services
Steve Roberge, Deputy Managing Director, Growth Management Services
Ben Serr, Eastern Region Manager, Growth Management Services
William Simpson, AICP, Senior Planner, Growth Management Services
John Flanagan, Policy Advisor, Office of Governor Jay Inslee
Jon Snyder, Policy Advisor, Office of Governor Jay Inslee