



American Planning Association
Washington Chapter

Making Great Communities Happen

January 28, 2016

The Honorable Senator Roach
Senate Committee on Government Operations and Security
112 Irv Newhouse Building
PO Box 40431
Olympia, WA 98504

The Honorable Senator Takko
Senate Committee on Government Operations and Security
226 John A. Cherberg Building
PO Box 40419
Olympia, WA 98504

Re: APA Washington Opposition to Senate Bill 6420

Dear Senators Takko and Roach and Committee Members,

The Washington State Chapter of the American Planning Association (Washington APA) respectfully submits comments on proposed Senate Bill 6420, modifying certain land capacity review and evaluation requirements.

APA Washington is an organization of people who make great communities happen through our engagement in public and private sector planning and decision making. We share our experience, knowledge and resources, stay current on planning issues and ideas, and contribute to great places. Our membership includes public and private sector professional planners, students, citizen planners, planning commissioners and government officials, and others.

SB 6420 amends section 36.70A.215 of the Growth Management Act, known as the Buildable Lands Program. This program is implemented almost exclusively by professional staff working in county and city planning departments. As such, our members have deep knowledge of, and deep concerns regarding, SB 6420. As currently written, **Washington APA opposes SB 6420.**

We offer the following examples of some of our concerns:

- Creation of an unfunded mandate: SB 6420 expands the requirement beyond the current six counties to all thirty-nine counties in the state. Some counties *fully* plan and some *partially* plan, but *all* counties in Washington plan under the Growth Management Act (GMA). Requiring a Buildable Lands analysis in small or slow growing counties is, first, neither warranted nor helpful and, second, establishing this complex requirement absent funding will hurt jurisdictions financially.

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- Imposing an inappropriate one-size-fits-all methodology: Leveraging the limited support the Department of Commerce's Growth Management Division is able to provide, jurisdictions have coordinated with each other and interested stakeholders in every round of the program. Further, jurisdictions have followed the guidance provided by the state.

SB 6420 seeks to impose a standardized methodology that will be inappropriate in many parts of the state. The arbitrary financial thresholds appear designed for rural counties but are dramatically under-sized for dense urban areas. And the requirement to exclude mobile home parks corrupts the analysis. We agree that retention of mobile home parks is a good public goal; however, excluding them from the Buildable Lands analysis will not provide the protection that is sought and will lead to poor quality data - exactly the *opposite of the intended goal* of establishing standardized methodology.

- Fundamentally altering Reasonable Measures and harming public health: SB 6420 essentially deletes the "reasonable measures" provision and replaces its long-range planning orientation with an immediate market analysis and an unclear requirement to achieve consistency in 5 years. Further, it removes the current limit on expanding the Urban Growth Area when measures to improve consistency are considered.

The Buildable Lands requirement is a "truth in planning" as well as an "early warning" provision of the GMA. Counties and cities plan for uses and densities that accommodate anticipated growth and, if actual observed development does not achieve those uses and densities, jurisdictions are required to redouble their efforts. Making Urban Growth Area expansions an option in response to findings of inconsistency undercuts this express intent of the statute. The result is sprawl and an inefficient use of urban land.

Instead of focusing growth inside Urban Growth Areas, SB 6420 proposes to promote an inefficient subdivision of land in portions of Urban Growth Areas without sewer service; this will lead to aquifer damage and degraded public health and the impacts will be most felt in smaller rural counties and counties in Eastern Washington that rely on aquifers.

APA Washington and its members have participated in every review of the Buildable Lands Program conducted by the state. We welcome the opportunity to continue to engage in dialogue with the other key stakeholders on this topic to improve the Buildable Lands Program. **We urge rejection of SB 6420.**

Thank you for your consideration.

Sincerely,



Paula Reeves, AICP CTP
President, Washington Chapter of the American Planning Association