



January 10, 2010

The Honorable Geoff Simpson  
Chair, House Local Government and Housing Committee  
426 John L. O'Brien Building  
Olympia, WA 98504-0600

RE: HB 2411: Relating to amending comprehensive land use plans for the purpose of adopting subarea plan proposals

Dear Representative Simpson:

The Washington Chapter of the American Planning Association strongly supports the passage of HB 2411. Our members recognize that subarea plans are powerful tools to facilitate desired growth in specific subareas of our communities. From town center plans, to neighborhood plans, to station area plans associated with new high capacity transit alignments, many communities would like to use the subarea plan process to craft locally appropriate solutions.

A survey of our members reveals that there is widespread confusion about the contradictory language within RCW 36.70A.130(2)(a)(i), the GMA provision that exempt subarea plans from the annual comprehensive plan amendment cycle. This confusion inhibits the timeliness, predictability and therefore more widespread use of this important planning tool.

While RCW 36.70A.130(2)(a)(i) already exempts subarea plans from the annual amendment cycle, its narrow language does not allow substantive amendments for the subarea (i.e., "does not modify the comprehensive plan policies and designations applicable to the subarea.") HB 2411 would remove this uncertainty by clarifying that such subarea plans may "clarify, supplement, or implement" the jurisdiction-wide comprehensive plan.

We understand that some may be concerned about allowing substantive changes in subareas apart from the annual amendment cycle. We believe that the potential cumulative impacts of such subarea plans on a



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jurisdiction-wide plan can be evaluated through the provisions of SEPA, as the explicit language of HB 2411 would require.

Again, APA Washington urges the Committee to recommend approval of HB 2411. Please contact me at your convenience if I can answer questions in this matter.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Scott Greenberg', written in a cursive style.

Scott Greenberg, AICP  
Washington Chapter of the American Planning Association  
President

Cc: Members of the House Local Government and Housing Committee