



# PLANNING & DEVELOPMENT SERVICES

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## MEMORANDUM

**To:** Board of County Commissioners  
**From:** Carly Ruacho, Guy McNally, and Jeroldine Hallberg  
**Date:** February 12, 2008  
**Re:** 2007 Comprehensive Plan Amendments (CPAs) Docket Recommendations:  
Citizen initiated (PL07-0597 and PL07-0808), County initiated map and policy  
amendments and subarea plans

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By the last business day of July of each year, any citizen, group or agency may submit an application to amend: (1) Comprehensive Plan policies, or (2) amend the Comprehensive Plan/Zoning Map designation of one or more parcels of land<sup>1</sup>. As you may recall, due to continued work on the 2005 GMA Update, which included many CPAs, the deadline to submit for the 2007 annual cycle was extended from July to October 10, 2007. The Department received two timely applications to amend the Comprehensive Plan/Zoning Map in this year's Comprehensive Plan Amendment cycle. No applications were submitted proposing policy amendments. However, several County-initiated Comprehensive Plan text amendments are proposed. This memorandum includes a description of each proposal as well as a docket recommendation for each of the privately submitted CPA applications. On Tuesday, February 19, the Department will provide an overview of the two CPA applications; 11 county-initiated map amendment proposals; Guemes and Alger subarea plans; county-initiated Comprehensive Plan text amendments; and discuss the Board's desires for further review and docketing.

**Docketing Process:** At the close of the annual CPA application deadline, the Department begins processing the applications by first assessing whether the proposed amendment can be reasonably and completely reviewed, taking into account available resources; the relationship of the proposal to future or ongoing work programs; and any legal or policy issues that would prevent its legal implementation. Upon completion of this initial review, the Department then forwards its recommendations to the Board as to which of the CPA requests should be "docketed" (listed to receive further consideration through public, agency and environmental review, hearings, and possible adoption by the Board).

Upon receipt of the Department's docketing recommendations the Board shall hold a public hearing to allow applicants and the general public to comment on the Department's recommendations. During the next available public meeting of the Board of County Commissioners, the Board shall establish the docket of annual amendments. Should the Board find that one or more of the CPA

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<sup>1</sup> Pursuant to SCC 14.08.020(2)

requests are unsuitable for docketing in the current CPA cycle, such request will be excluded from the docket, and upon the Board's approval, a portion of the application fees will be refunded to the appropriate applicants.<sup>2</sup> The criteria upon which the Department makes its docket recommendations, and the Board's decision on the docket, are procedural criteria that apply only to the current CPA applications. A decision to deny an application for inclusion on the docket is made without prejudice as to its future merits or fitness for consideration. Denying an application without prejudice does not preclude the applicant from re-applying during a future amendment cycle.

**Docketing Criteria:** Pursuant to SCC 14.08.030(3), the Department considers the following criteria when making its docket recommendations to the Board:

**Docketing Criteria:** Pursuant to SCC 14.08.030(3), the Department considers the following criteria when making its docket recommendations to the Board:

- ✓ Whether the proposed amendment, in light of all proposed amendments being considered for inclusion in the year's docket, can be reasonably reviewed within the staffing and operational budget allocated to the Department by the Board;
- ✓ Whether the proposed amendment, to be adopted, would require additional amendments to the Comprehensive Plan or development regulations that are not addressed in the petitioner's application, and is consistent with other goals, objectives and policies adopted by the Board;
- ✓ Whether the proposed amendment raises policy, land-use, or scheduling issues that would more appropriately be addressed as part of an ongoing or planned work program, or as part of a regular review cycle; or
- ✓ Whether the proposed amendment contains some legal or procedural flaw that would prevent its legal implementation.
- ✓ Whether the proposed amendment conforms to the submittal requirements of SCC 14.08, Legislative Actions, and other applicable provisions of Skagit County Code.

**Docket Recommendations:** The following is a brief summary and recommendation for the two citizen-initiated Comprehensive Plan/Zoning Map amendment requests as well a description of the county-initiated proposals. The Board may request additional clarifying information prior to any study sessions, hearings and action.

## **Part A: Citizen-Initiated Map Amendment Requests**

### **1. Windward Group, LLC – PL07-0597 (See Map No. 1)**

#### Summary:

The applicant proposes to add approximately 4.94 acres of Rural Reserve zoned land (P46542) to the Small Scale Recreation and Tourism (SRT) zone that currently includes the Guemes Island

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<sup>2</sup> Up to 80% of the application fee may be refunded per SCC 14.08.030(4)(b) and Resolution R20040311, or as amended.

Resort, on the northeast side of Guemes Island. The subject property is owned by the applicant in common with the adjacent, 16.84 acre, SRT-designated parcel (P46541). Both parcels were at one time a single parcel zoned Commercial-Limited Industrial (C-LI). The applicant states that an historical segregation of the two parcels was determined to be illegal, rendering the smaller, vacant parcel not eligible for development under Lot Certification regulations. Now that the parcels are again under common ownership, uniform zoning should be restored to the resort property as was past practice. Re-designation would increase total SRT acreage by 4.94 acres, to a total of 21.78, increasing the allowable developed area correspondingly (to a maximum of 20 acres of developed area). Pursuant to regulations governing SRT designated areas, more than 20 acres of land can be zoned SRT, however, there is a maximum allowed developed area of 20 acres. The applicant has not given any indication as to the future plans for the smaller lot either as SRT as proposed or currently as Rural Reserve.

Docket Recommendation:

**Deny for Docket.** The recommendation for denial on this proposal is in no way a reflection on its merits, it is merely an issue of timing. The Guemes Island Resort is located within the boundaries of the Guemes Island Subarea Plan study area, which has been a process ongoing for several years. The proposed plan for Guemes Island as developed by the Guemes Island Planning Advisory Committee, the County-recognized citizen group heading up the subarea plan, has been submitted to the County and is scheduled for review as part of this docket (see Part C, Subarea Plans). The proposed plan contains policy amendments but not map changes. The Department found through the 2005 GMA Update that it can be challenging to consider map amendments at the same time that policies and criteria affecting land use designations are potentially in flux and won't be finally resolved until adoption of the plan by the Board of County Commissioners. Rather than deferring this amendment request (Windward Group, LLC) to a subsequent annual amendment cycle which would require holding the applicant's fees paid to date, the Department would recommend denying the application now, without prejudice, and encouraging reapplication in the cycle following the completion of the subarea plan process. This path, versus possible indeterminable deferral would seem to be a preferable approach.

This option would also not preclude the applicant (or others) from proposing map changes as part of the public comment/hearing process on the Guemes Island Subarea Plan. The Department and the Planning Commission could determine at that time whether it was timely and appropriate to consider proposed map amendments together with the plan itself, or whether map amendments would be better considered in the next docketing cycle after adoption, by the Board of County Commissioners, of the Guemes Island Subarea Plan and any resulting changes to Comprehensive Plan policies.

**2. Bouslog Investments, LLC – PL07-0808 (See Map No. 2A – 2C)**

Summary:

The applicant proposes to change the designation of approximately 45 acres of land within the Bayview Ridge Urban Growth Area in the following manner:

- A) Rezone a 15-acre portion of P35378, located in Airport Environs Overlay Safety Zone 4S, from Bayview Ridge – Residential (BR-R) to Bayview Ridge-Community Center (BR-CC) to allow for a community park and playfields;
- B) Rezone a 15-acre portion of (roughly) the east half of P20983 from BR-CC to BR-R, effectively transferring BR-R zoning from P35378 (see A above), for the purpose of siting a K-8 elementary school.
- C) Rezone a 15-acre portion of the west half of P20983 from BR-CC to Bayview Ridge-Light Industrial (BR-LI).

Docket Recommendation:

**Deny for Docket.** With many Bayview Ridge UGA compliance issues still unresolved, the Department recommends settling those matters first, before contemplating any changes to the UGA. The applicant was informed of the Department’s preferred approach both prior to and since submittal of this application. The issue of siting an elementary school in the Bayview Ridge UGA is an important one and it will receive much consideration. However the proposal seems untimely pending the compliance issues as well as the policy changes that would be required to achieve the desired result. A master site planning process is planned for the entire UGA upon resolution of the compliance issues and this proposal would be much more appropriately dealt with during that process. Denying this application for docketing would allow the applicant to be refunded the allowed amount of the application fee, rather than keeping the application/applicant waiting indefinitely for a future process. The Department recommends that the applicant bring this proposal forward again in the future, as part of the Bayview Ridge master site planning process.

## **Part B: County-Initiated Map Amendment Proposals**

### **1. MT Enterprises and surrounding (See Map No. 3)**

The strip of land between F&S Grade Road and Thomas Creek will be evaluated to determine the appropriate boundary for the Agricultural-Natural Resource Land (Ag-NRL) and Rural Reserve (RRv) districts in the area. The current boundary between the two districts is F&S Grade Road. The area between Thomas Creek and F&S Grade Road does have a change in elevation in comparison to the farmed land to the south. There is some evidence to suggest that the soils may also change significantly in the area. This ‘strip’ will be evaluated against the designation criteria for the Ag-NRL zoning designation and a determination will be made as to whether or not that indeed is the appropriate designation. This matter was deferred from the 2005 GMA Update process and was known as CPA05-01. The review area is roughly 41 acres in size and is comprised of the northern portions of several parcels located approximately between the intersections of Avalon Heights Way and Valley View Roads with F&S Grade Road (south of the road). The primary question to answer in this case is whether F&S Grade Road or Thomas Creek provides a more logical boundary between the zoning districts based on designation criteria for both the Ag-NRL and RRv zones.

## **2. Ron Bates and surrounding area (See Map No. 4)**

The area north of Highway 20 in the Birdsvie vicinity will be reviewed to determine if changes to the properties currently designated as Rural Resource-Natural Resource Lands (RRc-NRL) are appropriate. Any parcels found not to meet the designation criteria for the RRc-NRL zone will be considered for a more appropriate zoning designation. This is an issue that was deferred from the 2005 GMA Update process and was known as CPA05-26. Parcels south of the Highway were reviewed during the Update process. Any changes in the area would not greatly affect the development potential of many of the lots, but would instead act to recognize existing lot sizes and development patterns that may not meet the RRc-NRL designation criteria. Much of the area is currently located within ¼ mile of the Mineral Resource Overlay which also limits development densities regardless of zoning.

## **3. Birdsvie Rural Resource (See Map No. 5)**

Four parcels in the western portion of Birdsvie currently designated as Rural Resource-Natural Resource Land (RRc-NRL) will be evaluated against the Rural Resource designation criteria for possible retention or de-designation. There is some question as to the appropriateness of designation of the current block of Rural Resource land considering existing development patterns in the area. The area to be reviewed is approximately 121 acres in size and is located south of Highway 20 and north of Rasar State Park. The surrounding area predominantly consists of Rural Reserve zoning with minimal areas of higher density Rural Intermediate as well as Public Open Space of Regional/ Statewide Importance (OSRSI) identifying the state park. The area to be reviewed includes two 20-acre parcels and two 40-acre parcels each owned by a separate individual and each used for various purposes including residential, timber management as well as agriculture. This matter is also known as CPA05-31 and was deferred from the 2005 GMA Update process.

## **4. Spinnaker Lane (See Map No. 6)**

This proposal would adjust the zoning district boundaries on several properties located off Spinnaker Lane on Fidalgo Island to remedy the current occurrence of 'split zoning' on the properties. This situation was caused by several recent boundary line adjustments in the area. As a procedural matter, zoning district boundary lines cannot be changed concurrent with a boundary line adjustment, but instead must be included in the next annual Comprehensive Plan Amendment cycle such as this. This matter was deferred from the 2005 GMA Update process and is known as SC05-06. Split zoning often does not serve an intended land use purpose, but can work to complicate the processing of development permits and application of the zoning code to those properties. The correction of inadvertently split-zoned properties is an ongoing process and occurs as they are identified.

**5. Gregg Cooley/Frank Adams (See Map No. 7)**

An existing area of Rural Business (RB) within the Alger Rural Village will be evaluated for retention/deletion as appropriate pursuant to the designation criteria. It appears that a mapping error occurred on the subject properties, based on confusion with other RB designated properties in the direct vicinity, which lead to the current RB designation. The properties have no existing commercial use and are zoned Rural Village Residential on the majority of the parcels. There is an existing home on each parcel, which is not an allowed use in the RB zoning district unless associated with a commercial business. Permitting for improvements and/or accessory uses as desired by the owners is not possible with the current zoning designation. The RB zone exists solely to recognize businesses in existence at the time of original adoption of the Comprehensive Plan (June of 1997) and does not appear to be an appropriate designation for these parcels.

**6. Bill Schmidt and surrounding (See Map No. 8)**

The area east of Walker Valley has been identified as containing a hard rock resource known as andesitic basalt. An area approximately 280 acres in size will be considered for inclusion in the Mineral Resource Overlay (MRO). The parcels proposed to be included in the MRO range from 20 acres to 80 acres in size and are zoned either Secondary or Industrial Forest-Natural Resource Land. The discovery of the outcropping of minerals in this area was made after public comment had concluded on the 2005 GMA Update and was therefore deferred for a future amendment cycle. The Department believed that the comments deserved further review and agreed to recommend this as a county-initiated amendment in the next available Comprehensive Plan Amendment cycle. Findings regarding the presence of mineral on the property will be reviewed against the designation criteria for the MRO to determine the appropriateness of an overlay designation for the area.

**7. Sauk River (See Map No. 9)**

An area along State Route 530 east of the Sauk River consisting of parcels currently zoned Secondary Forest-Natural Resource Land will be considered for redesignation to Rural Reserve. The area includes several platted lots approximately 3 acres or less in size. Similar parcels to the north were redesignated through the 2005 GMA Update process. The properties are used for residential and/or recreation and are isolated between the river and the highway. In order to achieve consistency of zoning with like parcels in the area as well as acknowledgement of existing development patterns, it appears that a redesignation is appropriate.

**8. Privately owned OSRSI**

Review privately held properties throughout the county currently zoned OSRSI for possible redesignation from 'public' zoning to more appropriate designation. Certain circumstances exist that will preclude the redesignation of all privately owned parcels from OSRSI, mainly in areas where all but one or a few lots are publically owned. However, in instances where a private parcel is not surrounded by publicly owned OSRSI designated land, it is inappropriate to

maintain the designation. As OSRSI is a ‘public’ zone it is therefore very restrictive in its allowances of private uses. This is problematic for owners erroneously zoned OSRSI in terms of acquiring permits for uses including residential and accessory uses.

### **9. State Parks to OSRSI**

In contrast to the above described proposal, there are several instances in the County where state parks do not currently hold the OSRSI zoning designation and are instead erroneously zoned with miscellaneous rural-type designations. Each state park would be reviewed for possible inclusion in the OSRSI zoning district as appropriate. Maintaining rural designations can pose difficulties for parks that seek to expand or develop as often park-type uses are not allowed at all or are only allowed through very extensive permitting processes. This issue was raised during the public comment period of the 2005 GMA Update process and was recommended for deferral to this amendment cycle.

### **10. Healy Road area (See Map No. 10)**

The Secondary Forest-Natural Resource Land ‘band’ in the area northeast of Lyman near Healy Road will be evaluated for possible redesignation to Rural Resource-Natural Resource Land or Rural Reserve. Due to existing parcel sizes and the general development pattern in the area, it may be prudent to shift the location of the ¼ mile SF-NRL band up one quarter section to the north. Many of the parcels currently designated SF-NRL in this area are used for residential purposes and are 1-2 acres in size. The larger parcels are generally mixed in use with small-scale agriculture and some timber as well as large critical areas including steep slopes and streams. Some combination of Rural Resource and Rural Reserve may better recognize the existing uses in the area and provide for a more appropriate designation generally. This matter was deferred from the 2005 GMA Update process and is known as FO05-10/11.

### **11. Small-lot Secondary/Industrial Forest perimeter properties**

During the 2005 GMA Update the issue of smaller lots designated as Industrial Forest-Natural Resource Land was raised repeatedly. It was seen by many citizens and members of the Planning Commission as a burdensome zoning designation and an issue deserving further attention. Although not all small lots can be removed from the Industrial Forest zone due to requirements for logical zoning district boundaries, there may be some properties along the fringe of the Secondary Forest/Industrial Forest border that could be afforded relief with minor changes in the application of the Secondary Forest ¼ mile band around the Industrial Forest zone. The perimeter areas will be reviewed to determine if any smaller lots would be more appropriately zoned as Secondary Forest. Areas completely surrounded by Industrial Forest are not proposed to be reviewed at this time. This is also not proposed to be a review of policies and/or designation criteria relating to Secondary Forest as a ‘band’ around Industrial Forest or the criteria distinguishing generally between Secondary and Industrial Forest. Instead, it is proposed to be a property-specific review of only those small-lot parcels on the perimeter of the two zones.

## **Part C: Subarea Plans**

### **1. Guemes Island Subarea Plan (See Map No. 11)**

The Guemes Island Planning Advisory Committee (GIPAC) submitted the Guemes Island Subarea Plan to the County on July 31, 2007, following public meetings on the island.

Policy changes are recommended in six areas:

- Land use
- Natural Resource Conservation
- Environment
- Shorelines
- Transportation
- Implementation

One 2005 land use map change was reviewed by GIPAC and found to be consistent with the proposed plan, though GIPAC decided to exclude it from the planning document to assure that the document is timely reviewed. The map amendment is CPA05-21 to change approximately 280 acres from Rural Reserve to Rural Intermediate north of Holiday Hideaway. The Board of County Commissioners agreed with the Planning Commission recommendation to remove it from the 2005 Update and review with the Subarea Plan. The Department is now recommending that the County first consider the Subarea Plan through this amendment cycle, including any changes to Comprehensive Plan policies that may result. Once the Subarea Plan and any resulting Comprehensive Plan policies have been adopted by the Board of County Commissioners, then the County should consider Guemes Island map amendments, including CPA05-21 and the Windward Group, LLC proposal addressed earlier in this memo (PL07-0597).

Once again, this option would not preclude interested parties from proposing map changes as part of the public comment/hearing process on the Guemes Island Subarea Plan.

### **2. Alger Subarea Plan (See Map Nos. 12 and 13)**

The Alger Citizen Advisory Committee (CAC) completed its work in 2007 and the Planning Commission reviewed the plan and associated map amendments. The Planning Commission recorded motion, which will be forwarded under separate cover this month, recommends adopting the Alger Community Plan and the following map and development code amendments. Each of the redesignation proposals described below must be found to meet the standards in the Growth Management Act and the Comprehensive Plan for limited areas of more intensive rural development (LAMIRDs).

#### **a. Rural Freeway Service (RFS) LAMIRD at Alger/I-5 Interchange (Jarvis)**

This amendment is for one parcel of 5.5 acres located at the I-5/Alger interchange. The parcel is currently zoned Rural Reserve. It is located across Lake Samish Road from the existing RFS designation adopted in 2000. The CAC believes the site meets both the “logical outer boundary” and “built environment” requirements of the GMA since it is completely surrounded by improved public roads in existence in 1990 and the existing home has been on site since the 1970s.



*b. Alger Rural Village LAMIRD – Rural Village Residential to Rural Village Commercial*

One of the key findings of the Alger community planning process was the lack of any significant remaining vacant land zoned for rural commercial use. This concern was accompanied by a desire to improve the appearance of the Alger village. The CAC reviewed the existing development pattern in the village and recommended five parcels for re-designation from Rural Village Residential (RVR) to Rural Village Commercial (RVC) to help promote more economic development opportunities within the existing village boundaries. The 5 parcels are P70380, P70381, P70370, P70361, and P70362. These recommended re-designations to Rural Village Commercial are intended to be accompanied by adoption of Rural Village design guidelines, described below.

*c. Alger Village South/Old Highway 99 Limited Rural Intermediate (RI)*

The Alger Village South/Old Highway 99 Limited RI redesignation would change 6 parcels totalling 24 acres from Rural Reserve to Rural Intermediate. The CAC based its decision on public input indicating a desire for further residential development opportunities south of the village along Old Highway 99 where existing road and sewer access are already in place and expansion can be limited to parcels that have direct or indirect public access to Old 99. This area is bordered on the north by the Rural Village and on the south by the existing Rural Intermediate area. LAMIRD analysis

*d. Old Highway 99 East Limited Rural Intermediate (RI)*

This proposal would create a 146-acre Rural Intermediate (RI) LAMIRD. It would adjoin existing RI to the south and with proposal (c) would create a continuous band of RI along Old Highway 99. An existing RI area is located across the highway. The CAC's reasoning for this proposal was the same as for the preceding recommendation. The Planning and Development Services report accompanying the Alger Subarea Plan does not recommend this redesignation because the Department does not believe it meets the LAMIRD criteria for infill on its own.

*e. Rural Village Design Standards – Development Code Changes*

The Alger Community Plan as recommended by the Planning Commission includes a conceptual design for how the crossroads village area could be more attractive and still reflect the citizens' desire for rural character. To help implement the concept, the Department is recommending a number of changes to the development code, such as grouping parking areas to the side and rear of new buildings, landscaping and lighting changes, use of natural stormwater management, and changes to permitted uses in Rural Village Commercial. Another measure to implement the changes involves working with the Public Works Department to modify the 100-foot right-of-way for the portion of Old Highway 99 north of the Alger-Cain Lake Road and use the excess area for landscaping and/or stormwater management to enhance the village's appearance. Public Works is exploring changes to the village intersection that would improve traffic safety and function. These changes can incorporate measures to improve pedestrian circulation and to further the recommended design concept.

## **Part D: County-Initiated Policy Amendment Proposals**

Although the Comprehensive Plan was reviewed as part of the 2005 GMA Update, review of certain portions of the Plan was deferred until after adoption of the GMA Update. Most of the revisions proposed below are minor clarifications, corrections of errors or omissions, or are

determined by the Department to be necessary to implement the intent of certain policies. The list below represents the Department's findings and recommendations to date.

Note: With the adoption of the 2005 GMA Update amendments, the Board of County Commissioners also adopted a list of future work-program tasks, referred to as "Trailing Issues" to be considered as priorities, time and budget allow. These trailing issues are not proposed to be addressed as part of this annual amendment cycle, as they generally require a more comprehensive or programmatic level of review, and are subject to priorities and funding commitments pending approval by the Board.

### **1. Review of Comprehensive Plan Definitions**

Comprehensive Plan Appendix A, Acronyms and Definitions, was not reviewed during the 2005 GMA Update. This proposal is to review Appendix A for omissions, errors and consistency with adopted policies and development regulations. If the Board of County Commissioners docket this editorial task, draft definitions will be prepared prior to release for public review.

### **2. Consistency With Recently Adopted Capital Facilities Plan**

Review of certain elements of Comprehensive Plan Chapter 10, Capital Facilities and Essential Public Facilities, was intentionally deferred during the 2005 GMA Update pending adoption of the County's 2008-2013 Capital Facilities Plan. Although the newly adopted Capital Facilities Plan was reviewed for consistency with the Comprehensive Plan policies in general, certain specific details regarding capital facilities may have changed. If the Board of County Commissioners docket this editorial task, draft changes to the Capital Facilities Element will be prepared prior to release for public review.

### **3. Update of Related and Supporting Documents List**

Comprehensive Plan Appendix C, Descriptions of Related Plans, Studies and Regulations, is a list of documents that in some way relate to or support the Plan's policies. Some of the documents listed have been updated, superseded, or are not relied upon as a basis for Comprehensive Plan policies. If the Board of County Commissioners docket this editorial task, a draft updated list of supporting documents will be prepared prior to release for public review.

### **4. List of Pending Community Plans**

Comprehensive Plan Chapter 12, Plan Implementation and Monitoring, includes a list of ongoing and future community plans. The latter (Policy 12A-4.2) is not inclusive of all communities, but instead reflects those areas or communities the County has identified as priorities through the expression of public interest. A minor clarifying amendment is proposed to emphasize that the list of future community plans is not all-inclusive. Also, the Lake Cavanaugh Rural Village is proposed to be added to the list in response to a recent (2005 GMA Update) Planning Commission finding regarding the need to study the feasibility of establishing a commercial use

on properties within the Rural Village, prior to consideration of expanding the Rural Village to accommodate such uses.<sup>3</sup>

Proposed Amendment (shown in underline format):

**Policy 12A-4.2**

The following areas and issues have been identified for future community planning, although no specific timing or order of priority has been established. Other areas may be identified in the future.

[Subsections (f) through (i) no change]

j. Lake Cavanaugh Rural Village. No commercial services currently exist within the Lake Cavanaugh Rural Village. A limited scope, or phased community planning process may be necessary to assess the feasibility of establishing commercial services, including a community store, within the existing boundaries of the Rural Village. The feasibility study would include an assessment of the community's need for commercial services, whether there are suitable properties for such uses within the Rural Village, and property-owner interest in establishing such uses. If the establishment of commercial services within the boundaries of the Rural Village is determined infeasible, then consideration should be given to the feasibility of expanding the Rural Village to accommodate the commercial needs of the community.

**5. Urban Growth Area Modification Policies**

To incorporate the recently-approved Urban Growth Area modification criteria into the Comprehensive Plan, the following policy in Chapter 2, Urban, Open Space and Land Use, is proposed to be amended as shown:

Proposed Amendment (shown in underline/strikethrough format):

**Policy 2A-1.2**

Proposals for Urban Growth Area expansions shall be evaluated for their consistency with the ~~Work with the cities and towns to establish criteria for evaluating future proposals for Urban Growth Area Modification Criteria~~ developed and approved by the Growth Management Act Steering Committee. These criteria address issues ~~expansions~~ including: land capacity analysis; ability to provide urban services; impacts on critical areas, natural resource lands, and hazard areas; and compliance with related Countywide Planning Policies.

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<sup>3</sup> Ordinance No. O20070009, Planning Commission Recorded Motion, Finding #163, Page 40.

**Policy 2A-1.2 (continued)**

Urban Growth Area expansion proposals shall demonstrate that expansion is necessary within the 20-year planning period, that public facilities and services can be provided concurrent with development, and that reasonable efforts have been made to encourage infill and redevelopment within existing Urban Growth Area boundaries before those boundaries can be expanded.