



Planning & Development Services

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Public Comments on Draft Transportation Element

Count	Last Name	First Name	Organization/ Address	Comment Method	Date Received
1	Strich	David	WSDOT	Email	09/19/2024
2	Roane	Sue	17140 Blodgett Road Mount Vernon, WA 98274	Email	10/06/2024
3	Krueger	Morgan	WDFW	Email	10/23/2024
4	Doran	Molly	Skagit Land Trust	Email	10/22/2024
5	Diephuis	Liam	414 Park Street Mount Vernon, WA 98273	Email	10/24/2024
6	Manns	Timothy	Skagit Audubon Society Board	Letter	10/24/2024
7	Weinberg	Aaron	EDASC	Email	10/24/2024

From: Strich, David <david.strich@wsdot.wa.gov>
Sent: Thursday, September 19, 2024 11:48 AM
To: PDS comments
Cc: Tara Satushek; Robby Eckroth
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies - Transportation Element

Thank you for the opportunity to review the draft policy revisions for the Transportation Element. I would like to offer the following comments:

Throughout the document there are instances with both capital "c" or lower case "c" for "No Change" and "No change" boxes. Consider editing for consistency.

For existing policy number 8A-1.1 consider revising "to meet adopted LOS standards..." with "to meet adopted **multimodal level of service** (LOS) standards..."

For existing policy number 8A-1.3 consider "reduce risk" instead of "increase safety". Consider replacing "security" with "comfort" especially when thinking about implementing metrics like Level of Traffic Stress (LTS) on facilities.

For existing policy number 8A-1.8, subsection County Road Standards consider removing "funded by grants" to keep open all finding options (e.g. earmarks, etc.)

For existing policy number 8A-3 consider removing "grant," to keep open all funding options

For existing policy number 8A-4.2 it seems a comma is missing between "jurisdictions" and "other"

For existing policy number 8A-4.3 it seems there is a line space between "such" and "closures"

For existing policy number 8A-6.12 font looks different

For existing policy number 8A-11.4 in reasoning for proposed policy change section, transportation is missing a letter "a"

For existing policy number 8B-1.2 – This item may need to be re-considered or re-structured. Wording seems too general and "encourage" may not be the appropriate action/verb. Indeed, WSDOT is mandated to consider Complete Streets on state highways, but only in certain contextual circumstances like designated population centers. In so doing, WSDOT will look to adopted County plans (e.g. Comprehensive Plan) for guidance on locally vetted preferences and interests for multimodal improvements. Consider



changing this language to be more collaborative so that the County takes responsibility for helping to determine how a state highway is considered. Also, “Encouraging the state to provide facilities” is not inclusive of instances when state projects may not provide a facility but rather be designed and constructed in a way that will not preclude future, possibly County-led or County-funded, projects on state highways.

Thanks again,
David

David Strich, PhD
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Northwest Region/Mount Baker Area (MBA) Planning
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É/彼/He/Him

Website: [Planning guidance | WSDOT \(wa.gov\)](#)



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Existing Goal - Number	Existing Policy Number	Page Number	Theme / Subheading	Comprehensive Plan - Policy (Full Text Copied from Plan)		Reasoning for Proposed Policy Change
8A		243	Safety Movement	Plan and maintain a safe and efficient system for the movement of people and goods in partnership, where appropriate, with the Skagit Council of Governments.	Plan and maintain a safe and efficient regional transportation system for the movement of people and goods in partnership, where appropriate, with cities, tribes, transit agencies, and the Skagit Council of Governments.	Inclusive regional focus
8A	8A-1	243	Safety Movement	Maintain and improve the County roadway system consistent with the growth management strategies of the Land Use Element, and respect the unique environmental and economic character of the area, including the transportation needs of the agriculture and forest products industries.	No Change 	
8A	8A-1.1	243	System Management	Monitoring for Congestion Relief - Monitor the capacity of the transportation system to meet level of service standards and manage congestion.	Monitor the capacity and completeness of the multimodal transportation system to meet adopted LOS level of service standards and in an effort to manage traffic congestion and provide safe and complete active transportation connections .	Inclusive MMLOS focus
8A	8A-1.2	243	System Management	Right-of-Way Preservation – Anticipate and address future transportation needs through strategies for acquiring rights-of-way and limiting of encroachments or ancillary uses that could endanger future roadway improvements.	No change	
8A	8A-1.3	243	System Management	Multi-modal transportation – Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users and provide alternatives to the passenger car.	Multi-modal transportation – Participate in the planning and implementation of multi-modal transportation systems to increase the safety, security and mobility of all users and provide alternatives to the passenger car, emphasizing the selection of projects that incorporate safety and security .	More safety focus 
8A	8A-1.4	243	System Management	Functional Classification – Designate all county roads according to the functional classification system mandated by federal and state law based on the character of service those road are intended to provide in urban and rural areas. Arterials should serve as the main routes to move traffic through the county. Collectors should serve as the supplemental routes for traffic within the county.	No change	
8A	8A-1.5	243	System Management	Skagit River - The County supports improving the flow of traffic over the Skagit River, including new bridge construction.	No change	
8A	8A-1.6	244	System Management	Arterial access - Primary arterial access points should be designed to ensure maximum safety while minimizing traffic flow disruptions.	No change	
8A	8A-1.7	244	System Management	Natural Resource Industries – consider the transportation needs of the agriculture and forest products industries when making decisions about the management and maintenance of the roadway system.	No change	

Comprehensive Plan Element: Transportation

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[Link to existing comprehensive plan here.](#)

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8A	8A-1.8	244	System Management	To ensure integration of transportation and land use planning, make decisions regarding the location and improvement of transportation facilities and public transit in a manner consistent with the Comprehensive Plan’s goals, policies, and land use map.	No change	
			County Road Standards		Develop and adopt a Skagit County Complete Streets ordinance to ensure that context-sensitive multimodal transportation improvements can be made and, where possible, funded by grants.	TIB Complete Streets grant requires ordinance; Many other award points for CS ordinance
8A	8A-2	244	Levels of Service	Establish level of service standards for the County’s road system to gauge the performance of the system and determine areas where transportation improvements are required.	Establish multimodal level of service standards recognizing the uniqueness of each mode for the County’s road system to gauge the performance of the County transportation system and determine areas where transportation improvements are required needed .	Inclusive MMLOS focus
8A	8A-2.1	244	Levels of Service	Level of Service Standards - The Level of Service (LOS) standard for County roads is C. LOS D is acceptable for all road segments that: (a) Have Annualized Average Daily Traffic (AADT) greater than 7,000 vehicles; and (b) Are NOT federally functionally classified as a Local Access Road; and (c) Are designated as a County Freight and Goods Transportation Systems Route (FGTS). The LOS standard for County road intersections is LOS D.	Level of Service Standards --The vehicular Level of Service (LOS) standard for County roads is LOS C . LOS D is acceptable for all road segments that: (a) Have Annualized Average Daily Traffic (AADT) greater than 7,000 vehicles; and (b) Are NOT federally functionally classified as a Local Access Road; and (c) Are designated as a County Freight and Goods Transportation Systems Route (FGTS). The vehicular LOS standard for County road intersections is LOS D.	
8A	8A-2.2	244	Levels of Service	The Level of Service Standards shall not be the overriding factor when the County is considering road improvements. Other factors such as the Priority Array and the Comprehensive Plan policies shall be given equal consideration with the LOS.	Vehicular LOS Standards shall not be the overriding factor when the County is considering road improvements. Other factors such as safety, active transportation needs , the Priority Array, and the Comprehensive Plan policies shall be given equal consideration with the vehicular LOS.	Specific to vehicles
			MMLOS	Currently none	LOS standards for pedestrian and bicycle facilities are based on the completeness of a defined and planned active transportation network. GREEN LOS indicates a complete segment. ORANGE LOS indicates an incomplete or substandard segment. RED LOS indicates a gap or missing segment.	HB 1181/GMA MMLOS for active transportation
			MMLOS	Currently none	LOS standards for transit in the public right-of-way are based on the ADA accessibility and upgrades for connectivity to the Skagit Transit network.	HB 1181/GMA MMLOS for transit


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8A	8A-2.3	244-245	Levels of Service	Design Standards – Maintain urban and rural design standards for structures, roads, and utility systems constructed either by the county or other public or private sponsors. These standards shall reflect the character of the communities as defined in the Land Use, Rural, and Community Planning Elements.	No change	
8A	8A-3	245	Public Transportation Coordination	Work with other agencies and jurisdictions to coordinate a safe, accessible, and integrated system of public transportation.	1.4 Work with other agencies and jurisdictions to plan, coordinate, and secure grant funding for a safe, accessible, and integrated system of public transportation. 	Implementation-oriented
8A	8A-3.1	245	Public Transportation Coordination	Transit Support- Encourage citizens and businesses to use transit as an alternative to the single-occupant vehicle.	No change	
8A	8A-3.2	245	Public Transportation Coordination	Transit Schedules – Allow County employees to adopt flexible work schedules that can be coordinated with transit schedules. Encourage similar actions by private and other public employers and employees.	No change	
8A	8A-3.3	245	Public Transportation Coordination	Support adequate funds for senior citizen and handicapped transportation systems to provide for those who, through age and/or disability, are unable to transport themselves.	No change	
8A	8A-3.4	245	Public Transportation Coordination	Encourage public transportation services to serve cities, towns, and Rural Villages, and to link with systems in adjoining counties, when financially feasible and supported by the public.	No change	
8A	8A-3.5	245	Public Transportation Coordination	Encourage private transit providers to continue to provide services that public transit cannot, including services to the County and State ferry system, and local and regional airports.	No change	
8A	8A-3.6	245	Public Transportation Coordination	Encourage coordination among public transit service providers, and between the public transit network and the non-motorized transportation system, to promote a more integrated transportation system for those traveling by means other than a private automobile.	No change	
			Skagit Transit	Currently none	Coordinate road construction projects with Skagit Transit to ensure current and future public transit infrastructure is considered in design and construction.	County ADA improvements benefit Skagit Transit riders

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8A	8A-4	246	Passenger Rail Transportation	Support passenger rail service to and through Skagit County as an important element of a balanced transportation system.	No Change	
8A	8A-4.1	246	Passenger Rail Transportation	Encourage rail agencies to implement a public education program on railroad safety.	No change	
8A	8A-4.2	246	Passenger Rail Transportation	Work with the Washington State Department of Transportation, local jurisdictions other agencies, and the public to make safety and other improvements to the rail corridors to allow for increased speeds for passenger trains.	No change	
8A	8A-4.3	246	Passenger Rail Transportation	Work with the Washington State Department of Transportation, local jurisdictions, other agencies and the public to determine the location of potential rail crossing closures and, where possible, to consider alternatives to such closures.	No change	
8A	8A-4.4	246	Passenger Rail Transportation	Road improvement decisions shall be consistent with any plans for rail crossings closures and with other aspects of rail service.	No change	
8A	8A-4.5	246	Passenger Rail Transportation	Plan for commuter rail service to Skagit County at such time it is determined to be economically and socially acceptable.	No change	
8A	8A-5	246	Ferry Service	Work to maintain county and state ferry services as an important element of the transportation network.	No Change	
8A	8A-5.1	246	Ferry Service	Encourage the provision of adequate street, highway, and road facilities to accommodate traffic to the ferry terminals in Anacortes.	Encourage the provision of adequate street, highway, and road pedestrian, bicycle, transit, vehicle, and freight facilities to accommodate traffic multimodal travel to the County and State ferry terminals in Anacortes.	Inclusive multimodal focus
8A	8A-5.2	246	Ferry Service	Work with the City of Anacortes, property owners, and residents on Guemes Island to develop and maintain adequate parking areas.	No change	

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8A	8A-5.3	247	Ferry Service	To meet future increases in demand, increase service capacity of the Guemes Island Ferry by: (a) encouraging car-pooling and walk-on passengers; (b) increasing the frequency of ferry runs based on demand; (c) considering additional ferry capacity if the aforementioned procedures fail to accommodate demand; and (d) adding additional runs outside the current schedule.	No change	
8A	8A-5.4	247	Ferry Service	In making all decisions related to the Guemes Island Ferry, balance the needs of the Island residents, the non-resident property owners, and the County citizenry as a whole. Decisions that would have significant service or financial impacts should be made after providing ample opportunities for public review and comment.	No change	
8A	8A-5.5	247	Ferry Service	Continue to provide safe and adequate ferry service between Anacortes and Guemes Island, and a fare structure designed to recover operating costs similar to the Washington State Ferries model.	No change	
8A	8A-5.6	247	Ferry Service	Support the State’s continued provision of ferry service to and from Anacortes- San Juan Islands-Vancouver Island, B.C.	Support the State’s continued restored provision of ferry service to and from Anacortes- San Juan Islands-Vancouver Island, B.C.	Restore international ferry service; support tourism
8A	8A-6	247	Non-Motorized Transportation Network	Provide a safe and efficient network of trails and bikeways, including both on- and off-road facilities that link populated areas of the County with important travel destinations. Achieve high standards in meeting the needs of non-motorized users, through appropriate planning, design, construction and maintenance of user-friendly facilities. Increase education, information and traffic enforcement efforts associated with non-motorized transportation as a means of lowering collision and injury rates associated with these modes.	Provide a safe and efficient network of trails and bikeways, including both on- and off-road facilities that link populated areas of the County with important travel destinations. Achieve high standards in meeting the needs of non-motorized active transportation users, through appropriate planning, design, construction and maintenance of user-friendly facilities. Increase education, information and traffic enforcement efforts associated with non-motorized active transportation as a means of lowering collision and injury rates associated with these modes.	The term "Non-motorized" has been replaced with "Active Transportation" to refer to human-powered walking, biking, and rolling (wheelchair/mobility device) modes
8A	8A-6.1	247-248	Non-Motorized Transportation Network	The Skagit County non-motorized transportation system is comprised of all streets and highways to which access by bicyclists and pedestrians is permitted, separated trails and pathways which have a transportation function as defined in the Non-Motorized Transportation Plan, and any system or design accommodations meant to serve non-motorized users.	The Skagit County non-motorized active transportation system is comprised of all streets and highways to which access by bicyclists and pedestrians is permitted, separated trails and pathways which have a transportation function as defined in the Non-Motorized Active Transportation Plan, and any system or design accommodations meant to serve non-motorized active transportation users.	Same as above

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8A	8A-6.2	248	Non-Motorized Transportation Network	The County’s Non-Motorized Transportation Plan should identify non-motorized needs in the County. Based on those needs, the plan should then identify and prioritize potential non-motorized projects.	The County’s Non-Motorized Active Transportation Plan should identify non-motorized identifies County needs in the County. Based on those needs, the plan should then identify and prioritize priorities, and potential non-motorized projects.	
8A	8A-6.3	248	Non-Motorized Transportation Network	The Non-Motorized Transportation Plan is a long-term plan to meet County multimodal goals and needs over 20 years. The inclusion of a project in the plan does not constitute a commitment that the County will fund or construct that project. Like all transportation projects, non-motorized transportation projects must be added to the Six-Year Transportation Improvement Program (6-Year TIP) in order to be funded.	The Non-Motorized Active Transportation Plan is a long-term plan to meet County multimodal goals and needs over 20 years. The inclusion of a project in the plan does not constitute a commitment that the County will fund or construct that project. Like all transportation projects, non-motorized active transportation projects must be added to the Six-Year Transportation Improvement Program (6-Year TIP) in order to be funded.	Same as above
8A	8A-6.4	248	Non-Motorized Transportation Network	Provide for the diverse needs of bicycle, pedestrian and equestrian modes through appropriate routing and the utilization of single-use and shared-use facilities. Encourage public education for motorists and non-motorized users alike on the importance of “sharing the road,” consistent with Traffic Safety policy 8A-10.3.	Provide for the diverse needs of bicycle, pedestrian and equestrian modes through appropriate routing and the utilization of single-use and shared-use facilities. Encourage public education for motorists and non-motorized active transportation users alike on the importance of “sharing the road,” consistent with State and County traffic safety policies. Traffic Safety policy 8A10.3.	Same as above
8A	8A-6.5	248	Non-Motorized Transportation Network	Connect neighborhoods and communities with each other and with other important destinations including schools, employment and commercial centers, medical and social service centers, other transportation facilities and modes, scenic and recreational areas, and the non-motorized facilities and systems of cities and towns within Skagit County and of adjoining areas.	Connect neighborhoods and communities with each other and with other important destinations including schools, employment and commercial centers, medical and social service centers, other transportation facilities and modes, scenic and recreational areas, and the non-motorized active transportation facilities and systems of cities and towns within Skagit County and of adjoining areas.	Same as above
8A	8A-6.6	248	Non-Motorized Transportation Network	Coordinate system planning, funding, and development with other local, regional, state, federal and tribal jurisdictions; and with public transit providers, as most public transit trips begin and end with walking or biking.	Coordinate system planning, funding, and development with other local, regional, state, federal and tribal jurisdictions; and with public transit providers, as most public transit trips begin and end with walking or biking, or rolling.	
8A	8A-6.7	248	Non-Motorized Transportation Network	Design all non-motorized facilities in compliance with federal, state and local accessibility standards.	Design all non-motorized multimodal transportation facilities in compliance with federal, state and local accessibility standards.	Same as above
8A	8A-6.8	248	Non-Motorized Transportation Network	Access and trailhead facilities should include adequate parking and sanitation.	Access and trailhead facilities should include adequate parking and sanitation.	

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8A	8A-6.9	249	Non-Motorized Transportation Network	Promote non-motorized transportation as a viable, healthy, non-polluting alternative to the single occupancy vehicle.	Promote non-motorized active transportation as a viable, healthy, non-polluting alternative to the single occupancy vehicle.	Same as above
8A	8A-6.10	249	Non-Motorized Transportation Network	Rail Corridors - Rail corridors should be preserved through the use of rail banking programs after affected property owners and their property rights are first adequately and legally addressed.	No change	
8A	8A-6.11	249	Non-Motorized Transportation Network	Community and subarea plans should identify and address the implementation of pedestrian, bicycle and (where appropriate) equestrian facilities that provide safe, efficient and convenient access to residential neighborhoods, schools, parks and recreation facilities, commercial districts, activity centers, tourist areas and established or planned multi-use trails.	Community and subarea plans should be coordinated between state and local governments and private enterprises to identify and address the implementation of multimodal pedestrian, bicycle and (where appropriate) equestrian facilities that provide recreational transportation opportunities as well as safe, efficient and convenient access to residential neighborhoods, schools, parks and recreation facilities, commercial districts, activity centers, tourist areas and established or planned multi-use trails.	Multimodal is all-inclusive
8A	8A-6.12	249	Non-Motorized Transportation Network	Emphasize maintenance of existing non-motorized facilities, including road sweeping, striping, signing, and debris removal, and the ongoing development of smooth and continuous road shoulders, including asphalt overlays or enhanced chip sealing where appropriate and feasible.	Emphasize maintenance of existing non-motorized active transportation facilities, including road sweeping, striping, signing, and debris removal, and the ongoing development of smooth and continuous road shoulders, including asphalt overlays or enhanced chip sealing where appropriate and feasible.	Same as above
			Air Quality	Currently none	The County will strive to reduce air pollution and greenhouse gas emissions by promoting the use of alternative transportation modes, reducing vehicular traffic, maintaining acceptable traffic flow, and siting of facilities.	HB 1181/GMA - Reduce GHG and VMT
8A	8A-7	249	Freight and Economic Development	Support economic development goals by providing adequate air, rail and surface freight handling routes and facilities throughout the County transportation system.	No Change	
8A	8A-7.1	249	Freight and Economic Development	Freight and Goods Transport System – Invest in road improvements to create an All-Weather Road System as part of the Freight and Goods Transportation System (FGTS). In conjunction with the state, designate portions of the road system as truck routes.	No change	
8A	8A-7.2	249	Freight and Economic Development	Provide roads structurally adequate to handle anticipated commercial traffic demand, particularly on the FGTS.	No change	

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8A	8A-7.3	249	Freight and Economic Development	Encourage the enhancement and expansion of freight rail service to and from economic activity centers.		No change
8A	8A-7.4	250	Freight and Economic Development	Encourage improvements to air transportation facilities consistent with the ports of Skagit County and the state Aviation System Plan. Improve road and transit linkages to airport facilities.		No change
8A	8A-8	250	Tourism and Recreation	Support the promotion of tourism, recreation, and special events through the County transportation system.		No Change
8A	8A-8.1	250	Tourism and Recreation	Involve affected jurisdictions in the planning and design of transportation projects that affect major tourism, park, and recreation facilities.		No change
8A	8A-8.2	250	Tourism and Recreation	Coordinate management of the transportation system during special events with the responsible program organizations, while minimizing the disruption of normal economic operations including agriculture, forestry, and other natural resource industries.		No change
8A	8A-8.3	250	Tourism and Recreation	Encourage the state to consider high-season traffic demand on SR 20 in East Skagit County whenever the state studies the need for improvements.		No change
8A	8A-9	250	Scenic Highways	Support the preservation and enhancement of scenic highways and historic, archeological and cultural resources within Skagit County.		No Change
8A	8A-9.1	250	Scenic Highways	Scenic Roads Program – Encourage the state and federal Scenic Highways and Scenic Byways programs to ensure the preservation of scenic resources along designated highways.		No change
8A	8A-9.2	250	Scenic Highways	Interpretive sites - Develop cultural, historic and natural interpretive sites situated on public lands in a way that non-motorized travelers can enjoy them.		No change
8A	8A-9.3	250	Scenic Highways	Coordination - Work with the state to implement and maintain highway heritage programs in Skagit County, which integrate scenic resource preservation with the enhancement of access to historic, archeological and cultural resources along the County's highways.		No change
8A	8A-10	251	Traffic Safety	Provide a safe travel environment for county residents and visitors in all modes of transportation. Recognize public safety, education, and law enforcement as integral to the development of non-motorized transportation opportunities in Skagit County.		No Change

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8A	8A-10.1	251	Traffic Safety	Safety Improvements - Include safety improvements as a priority in all capital projects and maintenance decisions relating to the County road system.	No change	
8A	8A-10.2	251	Traffic Safety	Rules of the Road - Promote the safe use of transportation facilities and conformance with “rules of the road.”	No change	
8A	8A-10.3	251	Traffic Safety	Education -Encourage educational programs that teach or encourage transportation safety for all non-motorized users. Encourage awareness among motorists of the rights and responsibilities of motorists and cyclists and the importance of “sharing the road.”	No change	
8A	8A-10.4	251	Traffic Safety	Minimize conflicts - Encourage planning, design and educational programs that help minimize conflicts among users.	No change	
			Traffic Safety	Currently none	Balance transportation user convenience with safety, preservation of capacity, and access management.	Balance multiple needs
8A	8A-11	251	Road Maintenance and Monitoring	Develop a systematic approach for monitoring and maintaining the transportation system in a cost-effective manner. Provide a high level of maintenance to the County transportation system.	No Change	
8A	8A-11.1	252	Road Maintenance and Monitoring	Monitor (count and assess) traffic volumes on all arterial and major collector roads, and other selected roads as needed, to assist in planning and capital facility programs.	No change	
8A	8A-11.2	252	Road Maintenance and Monitoring	Coordinate monitoring efforts with other County departments as appropriate, and with other state and local jurisdictions and agencies.	No change	
8A	8A-11.3	252	Road Maintenance and Monitoring	Operate a road and bridge maintenance management program to ensure that roads and bridges are adequately protected from overloading, meet County and state standards, and are programmed for maintenance and repair on a regular basis.	No change	
8A	8A-11.4	252	Road Maintenance and Monitoring	Maintain a program for addressing traffic safety problems through monitoring of high incident conditions.	No change	

Comprehensive Plan Element: Transportation

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			ITS Technology	Currently none	Work with the SCOG to enhance transportation accessibility with a regional Intelligent Transportation Systems architecture that includes traveler information as a major component.	RTP requirement and state of art in trnsportation industry
8A	8A-12	252	Demand and System Management	Increase the efficiency of the existing transportation system before major capital expenditures are made.	Increase Select and build the most efficiency mix of the existing transportation modes facilities based on the need to balance accessibility and demand system before major capital expenditures are made.	"Increasing efficiency" can be code for "maintian speed" - this balances many needs
8A	8A-12.1	252	Demand and System Management	Implement transportation system management techniques, such as the synchronization of traffic signals and provision of left-turn lanes, as a way to increase the efficiency and safety of the existing transportation system with a minimum of cost.	No change	
8A	8A-12.2	252	Demand and System Management	Encourage the Skagit Council of Governments to implement transportation demand management strategies, such as increased transit service and flexible work schedules, to reduce the demand for travel in single-occupancy vehicles, especially at peak traffic periods.	No change	
8A	8A-13	252	Land Use and Development	Incorporate transportation goals, policies, and strategies into all County land use decisions.	Incorporate multimodal transportation goals, policies, and strategies into all County land use decisions.	Inclusive of all modes
8A	8A-13.1	253	Land Use and Development	Impacts of Growth – Growth and development decisions shall ensure that the short- and long-term public costs and benefits of needed transportation facilities are addressed concurrently with associated development impacts.	No change	
8A	8A-13.2	253	Land Use and Development	Directing Growth - Mitigate transportation impacts, wherever possible, by directing new development into areas where long term capacity exists on the arterial and collector system.	No change	
8A	8A-13.3	253	Land Use and Development	Public Transportation Accessibility – Require new development and redevelopment to provide adequate motorized and non-motorized transportation facilities within and adjacent to the development, and to provide access to public transit, where available.	Public Transportation Accessibility —Require new development and redevelopment to provide ADA upgrades and adequate motorized and non-motorized multimodal transportation facilities within and adjacent to the development, and to provide access and connectivity to public transit, where available.	Require growth to help pay for the impacts of gropwth, such as ADA and multimodal projects
8A	8A-13.4	253	Land Use and Development	Airport Expansion - In the vicinity of the Skagit Regional Airport, review development proposals to avoid future conflicts and the foreclosure of opportunities for future airport expansion.	No change	

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8A	8A-13.5	253	Land Use and Development	Coordination with County Engineer - Following major amendments to the Comprehensive Plan, the County Road Engineer shall review the Functional Classification, the Priority Array, and the road standards for consistency and compliance with the Comprehensive Plan. Recommended changes shall be forwarded to the Planning Department and the Planning Commission for comments prior to their submittal to the Board of County Commissioners for action. The review shall take place within the first year after major Comprehensive Plan updates.	No change	
8A	8A-13.6	253	Land Use and Development	Support for Existing Development – Coordinate efforts to develop infrastructure that improves the efficiency of existing major industrial and commercial areas.	No change	
8A	8A-13.7	253	Land Use and Development	Right-of-Way Dedication – The County shall require dedication of right-of-way for needed roads in conjunction with the approval of development projects.	Right-of-Way Dedication – The County shall require dedication of right-of-way for multimodal transportation improvements needed roads in conjunction with the approval of development projects.	Public ROW is not exclusively for vehicle-oriented roads
8A	8A-13.8	253-254	Land Use and Development	Land Use Compatibility - The planning, design, location and construction of new transportation projects and facilities shall consider and be compatible with adjacent land uses, as indicated in the Comprehensive Plan and development regulations, including natural resource activities and rural residential areas.	No change	
8A	8A-13.9	254	Land Use and Development	Arterials and collectors - When arterials and collectors traverse residential areas, appropriate traffic controls shall be employed to balance the needs of both the local residents and the traveling public.	Arterials and collectors - When arterials and collectors traverse residential areas, appropriate traffic controls shall be employed to balance the multimodal transportation needs of both the local residents and the traveling public.	Accommodate many needs
8A	8A-13.10	254	Land Use and Development	Transportation facility standards - Incorporate standards within the land development regulations to ensure that new development and redevelopment provide adequate motorized and non-motorized transportation facilities within and adjacent to the development.	Transportation facility standards- Incorporate Complete Street standards within the land development regulations to ensure that new development and redevelopment provide adequate motorized and non-motorized multimodal transportation facilities within and adjacent to the development.	Accommodate many needs
8A	8A-13.11	254	Land Use and Development	Implement development regulations that allow electric vehicle infrastructure, including battery charging stations, as a use in all areas except those zoned for residential or resource use or critical areas.	No change	
			Land Use		Promote transportation improvement strategies that support future densification of urban growth areas while transitioning and connecting seamlessly to rural areas.	Focus on density

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8A	8A-14	254	Concurrency	Ensure that suitable mitigation measures for addressing the impacts of growth are fair and equitable, and that transportation impacts at the project and system levels are mitigated concurrently with the project.	Ensure that suitable mitigation measures for addressing the impacts of growth are fair and equitable, and that transportation impacts at the project and system levels are mitigated concurrently with the project, <u>consistent with the Growth Management Act.</u>	Many recent changes to GMA
8A	8A-14.1	254	Concurrency	When a development project has a particular impact on the safety, structure or capacity of the County's road system, suitable mitigation shall be required in the form of improvements or through the use of adopted impact fees.	When a development project has a particular impact on the safety, structure or capacity of the County's road system, suitable mitigation shall be required in the form of improvements or through the use of adopted impact fees, <u>which may include pedestrian and bikeway projects.</u>	RCWs/GMA now allow ped-bike facilities on Transportation Impact Fee (TIF) project lists
8A	8A-14.2	254	Concurrency	The County may, in cooperation with a city, collect impact fees on behalf of that city or town for development within its Urban Growth Area, and may enter into cost sharing arrangements where each shares impact fees collected by the other for impacts to their respective roads.	No change	
8A	8A-14.3	254-255	Concurrency	As an alternative, the County may agree to participate in joint planning, funding, and construction of mutually beneficial transportation improvement projects for the unincorporated portion of a city UGA and the adjacent area in the county with city willing to enter into a Joint Transportation Planning, Funding, and Construction Agreement with the County.	No change	
8A	8A-14.4	255	Concurrency	The County may consider the use of impact fees and SEPA mitigation fees as a means to ensure that adequate facilities (including but not limited to transit, pedestrian, bikeways, or roadways) are available to accommodate the direct impacts of new growth and development.	No change	
8A	8A-14.5	255	Concurrency	If an impact fee ordinance is not in place, the County may require large developments to make improvements or pay a fee in lieu if the development significantly adds to a road's need for capacity improvement, to a roadway safety problem, or to the deterioration of a physically inadequate roadway. Such traffic impact contributions are in addition to transportation facility improvements required in the immediate area for access to and from the development.	No change	
8A	8A-14.6	255	Concurrency	The County, in cooperation with the development community, may address transportation impacts of growth, through the GMA and the State Environmental Policy Act as a practical solution to meet the intent of Goal 8A-14 above.	No change	Be aware: SB 5412 allows SEPA categorical exemption for housing projects if County completes process steps

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			Concurrency/ TIP		Publish an Annual Concurrency Report for County road segments, intersections, and active transportation network completeness to inform the six-year Transportation Improvement Program (TIP) process.	Annual tracking and monitoring for MMLOS and 6-Year TIP investments
8B		255	Implementation and Intergovernmental Coordination	Jointly plan, prioritize, and finance transportation improvements with federal, state, regional, and municipal partners for the greatest public benefit.	No change	
8B	8B-1.1	255	Implementation and Intergovernmental Coordination	Future Plans – Coordinate transportation plans with local, state, and tribal jurisdictions through the Skagit Council of Governments, to identify and provide solutions for anticipated transportation challenges identified over the 20-year life of the Comprehensive Plan.	No change	
8B	8B-1.2	255	Implementation and Intergovernmental Coordination	SR 20 – Encourage the state to provide facilities for non-motorized transportation as part of improvements to SR 20.	SR-20 Encourage the state to provide facilities for non-motorized active transportation as part of improvements to SR20 all state highways, consistent with RCW 47.04.035 Complete Street Principals.	RCW 47.04.035 requires WSDOT to incorporate locally identified active transportation needs
8B	8B-1.3	255	Implementation and Intergovernmental Coordination	Joint Development – Cooperate with the cities and towns in planning for joint development of road improvements that support mutual objectives.	Joint Development – Cooperate with the cities and towns in planning for joint development of road transportation improvements that support mutual objectives.	No just road projects
8B	8B-1.4	256	Implementation and Intergovernmental Coordination	State Highway Improvements - In order to ensure that local efforts to meet GMA concurrency requirements are not undermined by inadequate state highways, support efforts at the state level to adequately fund legitimate highway improvement needs.	No change	
8B	8B-1.5	256	Implementation and Intergovernmental Coordination	Public Involvement Encourage the Washington State Department of Transportation to maintain close coordination with the local jurisdictions and the Skagit Council of Governments in transportation planning and in the transportation project decision-making process. In support of this, the County encourages the State to continue enhancing its public involvement programs for state transportation decisions.	Ensure the early, meaningful, inclusive, equitable, and continuous participation of the region's interested parties in the planning process, and encourage the Washington State Department of Transportation to maintain close coordination with the local jurisdictions and the Skagit Council of Governments in transportation planning and in the transportation project decision-making process. In support of this, the County encourages the State	Public engagement / equity

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					to continue enhancing its public involvement programs for state transportation decisions.	
8B	8B-1.6	256	Implementation and Intergovernmental Coordination	Americans with Disabilities Act - The County shall comply with the "Americans with Disabilities Act of 1990."	Americans with Disabilities Act - The County fully supports the "Americans with Disabilities Act (ADA) of 1990" and will implement the Skagit County ADA Transition Plan for facility upgrades.	GMA now requires ADA Plans and Transit LOS
8B	8B-1.7	256	Implementation and Intergovernmental Coordination	Traffic Impacts - In determining traffic impacts of development projects, the County should consider the impacts to all jurisdictions (county, city/town, and state) and condition such projects as necessary to mitigate the impacts.	No change	
			Intermodal/Inter-Connectivity		Promote modal interconnectivity that best serves the users by identifying missing links and connections, and working with partner agencies to provide missing links.	Intergovernmental
			Interjurisdictional		Provide a County Transportation Element that supports local Town and City comprehensive plans, including unincorporated UGAs.	Intergovernmental
			Equity/Inclusion		Ensure equitable, inclusive, and accessible public engagement opportunities to all Skagit County citizens in the development of transportation plans.	Public engagement / equity
			Public outreach		Collect, consider, and where feasible, incorporate public comments prior to making public funding decisions on transportation decisions.	Public engagement
			Interjurisdictional		Encourage efficient, multimodal transportation systems that are based upon regional priorities and coordinated with county and city comprehensive plans.	Intergovernmental
8C		256	Capital Improvements	Integrate the Six-Year Transportation Improvement Program (TIP) and the 20-year long range transportation needs assessment with the Capital Facilities Plan consistent with the goals and policies of this Comprehensive Plan.	No change	

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8C	8C-1.1	256	Capital Improvements	Evaluation Criteria – Evaluate proposed projects according to the Comprehensive Plan goals and policies as well as engineering feasibility, costs and benefits to the public, safety, impacts to the built and natural environment, community support, opportunities for staged implementation, system benefits and maintainability.	No change	
8C	8C-1.2	256	Capital Improvements	Funding – Make transportation capital investment decisions in consideration of capacity, safety, economic development, public health, and growth management needs.	No change	
			Capital Improvements			All transportation capital improvements shall incorporate removal of barriers to fish passage, where applicable. WSDOT fish passage
			Capital Improvements			To the extent feasible, all new and expanded County transportation facilities shall be sited, constructed, and maintained to minimize noise levels. Noise reduction

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Tara Satushek

From: Susan Roane <sjr4140@outlook.com>
Sent: Sunday, October 6, 2024 6:45 AM
To: PDS comments
Subject: Possible Spam: Skagit County Comprehensive Plan Draft Policies/Transportation&Climate

Re: September 24th Comp Plan Update/ 2 ideas I hope you will use.

Chris Comeau said "the county needs to look at reducing vehicle miles traveled" and referenced HB1181 which requires a climate change element to our county transportation plan. I hope you will consider using the following suggestions to help achieve the change from "auto-oriented to multimodal", and to reduce car emissions.

If you have been near any of our schools during drop-off and pick-up times, I am sure you are aware that single car use is significantly increased during these hours, which significantly affects the air quality. The EPA has a well laid out no idling plan, including timeline, handouts, and lesson plans intended to reduce school traffic flow. It is a ready to go plan. [Idle-Free Schools Toolkit for a Healthy School Environment | US EPA](#)

I hope you will consider encouraging schools to use this EPA toolkit.

Also, I hope you will look at the SKAT system. I have asked them, without success, to co-ordinate their arrival and departure times with the school bell at Cascade Middle School. The bus arrives 10 minutes *after* the morning bell and 10 minutes *before* the dismissal bell.

Thank you for your time and consideration,

Sue Roane
17140 Blodgett Road
Mount Vernon, WA 98274
360-770-7485



State of Washington

Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

October 23, 2024

Robby Eckroth, Senior Planner
1800 Continental Pl
Mount Vernon, WA 98273

RE: Case # 2022-C-307, WDFW comments for Skagit County’s draft Capital Facilities, Utilities, and Transportation Comprehensive Plan elements

Dear Mr. Eckroth,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on draft elements of Skagit County’s Comprehensive Plan as part of the current periodic update. Within the State of Washington’s land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions. We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

Table 1. Recommended changes to proposed policy language.

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW Comment
Capital Facilities and Utilities Element (this version: link)		
Goal 9A	Ensure the provision of high quality, cost effective and environmentally sensitive utility services in cooperation with public and private providers.	We encourage the county to incorporate ecosystem services under goal 9A. An example policy might include: Ensure that the planning, design, and maintenance of utilities and capital facilities reflect the value of ecosystem services. This includes integrating natural processes, such as tree canopies for passive heating and cooling, wetlands for stormwater management, and native vegetation for energy efficiency. By protecting ecosystem services, the County can make informed

		<p>decisions that reduce infrastructure costs, enhance resilience, and contribute to long-term environmental and community sustainability.</p> <p>Capital facility and utility plans should incorporate ecosystem services provided by natural environmental processes. Tree canopies help cool buildings, reduce the need for air conditioning, and provide wind protection that lowers heating demands. Retained vegetation also enhances energy efficiency by optimizing passive solar heating and improving insulation. Additionally, vegetation helps manage stormwater flow and filtration, reducing reliance on energy-intensive systems. Protecting and restoring natural assets is often more cost-effective than engineered solutions. See FEMA’s guide Building Community Resilience with Nature-based Solutions, as well as software to track these resources from Natural Capital Project. Furthermore, see Kitsap County’s approach to quantifying ecosystem services through their Kitsap Natural Resource Asset Management Project.</p>
Policy 9A-5.3	Technology Solutions - Residential, commercial, and industrial development shall be encouraged and incentivized to use energy-efficient, cost-effective, and environmentally sensitive technologies and resources in new construction.	We encourage Skagit County to participate in the effort to address environmentally sustainable development by utilizing incentives. See Shoreline’s deep green incentive program which outlines how green development can participate in expedited review as well as fee waivers and/or reductions. The Sustainable Development Code website is also a great resource in outlining how to remove code barriers, create incentives, and fill regulatory gaps in pursuit of this policy’s goals. See also the city of Issaquah and Bellevue’s clean building incentive programs that aim to assist applicants in reaching energy efficiency standards.
Goal 9B	Protect and enhance natural hydrologic features and functions by: maintaining water quality and fish and wildlife habitat; incorporating natural drainage patterns into measures to protect the public from health and safety hazards and property damage;	Quantifying ecosystem services in monetary terms provides a tangible, measurable framework that allows stakeholders to better understand the cost-saving and environmental benefits of protecting natural hydrologic features. When these benefits—such as improved water quality, flood mitigation, and groundwater recharge—are translated into economic terms, they become more relatable and

	<p>maintaining a sustainable groundwater discharge/recharge budget; and by promoting beneficial uses as well as water resource education and planning efforts. Additionally, prioritize the quantification of ecosystem services as a metric for cost-saving and environmental sustainability to better inform and optimize resource management and infrastructure investments.</p>	<p>compelling for decision-makers, enabling informed choices that consider both immediate and long-term savings. By integrating this approach into policy, Skagit County can demonstrate how sustainable management of natural resources supports infrastructure resilience, reduces public expenditures on traditional “gray” infrastructure, and fosters community well-being, making it easier for stakeholders to prioritize and invest in sustainable development. See resources in relation to comments given for Goal 9A above. Additionally, see the USGS’s Ecosystem Services Assessment and Valuation tools, as well as i-Tree.</p>
Policy 9B-1.9	<p>Coordination of Regulations: The county shall work with other jurisdictions and agencies toward standardization and monitoring of regulations that affect storm water management. Additionally, should stormwater management goals not be met, an adaptive management plan shall be implemented to assess, adjust, and improve strategies to ensure the continued protection of citizen and ecosystem health.</p>	<p>This addition reflects the importance of adaptive management in tracking the effectiveness of stormwater regulations. It ensures that, if goals are not achieved, there will be a responsive approach to modifying practices.</p>
Goal 10A	<p>Ensure that adequate public facilities are provided to accommodate the needs of Skagit County citizens for the next 20 years by:</p> <ul style="list-style-type: none"> • maintaining level of service standards for capital facilities; • providing consistency among functional plans; • ensuring compatibility of development adjacent to public facilities; • ensuring timely provision and financing of facility improvements; 	<p>Given that public facilities represent significant public investments, it is prudent to ensure that facilities are designed and sited to be resilient to climate impacts. Local governments should review their Capital Facilities Plans in the context of climate change projections to ensure that planned facilities will be resilient throughout their intended lifespan and make changes as needed. See Climate Mapping for a Resilient Washington, as well as FEMA’s Resilience Analysis and Planning Tool (RAPT) to visualize these hazard areas.</p>

	<ul style="list-style-type: none"> • Siting public facilities with climate-related hazards in mind, such as flooding, sea-level rise, and extreme weather, to enhance community resilience and reduce future risks and • taking advantage of revenue sources such as impact mitigation, grants, and loans. 	
<p>Policy 10A-1.7</p>	<p>Prioritizing Improvements - Capital improvement decisions shall be based on the following criteria:</p> <p>(a) Safety – elimination of hazards;</p> <p>(b) Efficiency – reduction of operational costs;</p> <p>(c) LOS – achievement of adopted or desired standards;</p> <p>(d) Community – satisfaction of expressed desires; and</p> <p>(e) Funding – use of non-county funds; and</p> <p>(f) Environmental Impact – minimization of environmental harm and support for sustainable practices</p>	<p>Adding ‘Environmental Impact’ as a criterion for capital improvement decisions is crucial for Skagit County, given its valuable natural resources like salmon-bearing streams, agricultural lands, and sensitive shorelines. Prioritizing environmental considerations helps protect these assets, supports long-term sustainability, and strengthens resilience against climate-related hazards such as flooding, ensuring that infrastructure investments align with the County’s commitment to preserving its unique landscapes and quality of life.</p>
<p>Policy Suggestion</p>	<p>Allocate funding in the Capital Facilities Plan for stormwater retrofits and culvert upgrades, prioritizing projects that enhance fish passage, connect wildlife habitat corridors, anticipate future climate-related high flow conditions, and prevent pollutants from entering the Sound.</p>	<p>Investing in stormwater retrofits and culvert upgrades allows Skagit County to address salmon recovery, habitat connectivity, and future flood risks in tandem, particularly within key habitats in WRIAs 3 and 4, which support threatened species like Chinook, steelhead, and bull trout. Larger culverts and underpasses can facilitate habitat connections, allowing for safe wildlife movement and reducing fragmentation. Prioritizing these projects in the Capital Facilities Plan not only aligns with regional salmon recovery efforts (Skagit Watershed Salmon Recovery Plan, Puget Sound Partnership Action Agenda, and the NOAA Chinook Recovery Plan) but also enhances climate</p>

		<p>resilience by improving flood capacity and reducing the risk of future flood damage. Addressing flood capacity needs now helps avoid costly emergency repairs and infrastructure upgrades in the future, saving the County money and providing a proactive approach to community safety. By integrating these investments, Skagit County can promote sustainable infrastructure that protects both ecosystems and residents for years to come.</p> <p>Please see WDFW's climate-change-resilient culvert webpage and Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report (2017) for resources on how to incorporate climate-resiliency into culvert designs. See WDFW's Fish Passage Map for location data of fish barriers.</p>
<p>Transportation Element (this version: link)</p>		
<p>Goal 8A</p>	<p>Plan and maintain a safe and efficient regional transportation system for the movement of people, wildlife, and goods in partnership, where appropriate, with cities, tribes, transit agencies, and the Skagit Council of Governments.</p>	<p>Inserting "wildlife" into this policy is crucial for Skagit County as it balances rural character with rapid development and increasing population density. As the County grows, the expansion of transportation infrastructure risks fragmenting essential wildlife habitats, which can disrupt migration corridors, reduce biodiversity, and increase conflicts between wildlife and human activities. By explicitly including wildlife in the policy, Skagit County can plan and maintain a transportation system that prioritizes wildlife connectivity, ensuring that critical habitats remain intact and accessible. This focus not only protects local ecosystems but also enhances motorist safety by reducing the likelihood of wildlife-vehicle collisions, ultimately supporting a transportation network that meets the needs of people and wildlife alike. For resources, see The Washington Wildlife Habitat Connectivity Working Group, WSDOT's Reducing the risk of wildlife collisions website as well as Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects, Montana Fish, Wildlife, and Parks' How to Build Fence with Wildlife in Mind, and WDFW's website.</p>

<p>Policy 8A-1</p>	<p>Maintain and improve the County roadway system consistent with the growth management strategies of the Land Use Element, and respect the unique environmental and economic character of the area, including the transportation needs of the agriculture and forest products industries and the importance of preserving wildlife movement corridors.</p>	<p>See comment above.</p>
<p>Policy 8A-1.5</p>	<p>Skagit River - The County supports improving the flow of traffic over the Skagit River, including new bridge construction, with a commitment to minimizing environmental impacts by incorporating wildlife connectivity, preserving water quality, and enhancing flood resilience.</p>	<p>Adding environmental provisions to the Skagit River bridge policy supports infrastructure resilience by addressing climate-related impacts such as increased storm intensity and flood risks. Designing new water crossing structures with these challenges in mind ensures that bridges accommodate changing flow patterns, protecting both the river ecosystem and nearby communities from flood damage. Additionally, considering climate-resilient features enhances the bridge’s durability over time, reduces long-term maintenance costs, and improves wildlife connectivity, ultimately aligning with Skagit County’s goals for sustainable growth, environmental protection, and infrastructure longevity. See resources in response to Goal 8A above.</p>
<p>Policy 8A-6.2</p>	<p>The County’s Active Transportation Plan identifies County needs, priorities, and potential non-motorized projects.</p>	<p>We strongly recommend that the County’s Active Transportation Plan take into account the multi-benefit outcomes of addressing both recreational needs and wildlife habitat corridor needs simultaneously. By incorporating pathways and green spaces that are designed to support human activity as well as wildlife movement, the County can create a network of connected spaces that enhance public recreational opportunities while connecting and preserving critical habitats. This approach promotes biodiversity by maintaining habitat connectivity, reduces habitat fragmentation caused by infrastructure, and</p>

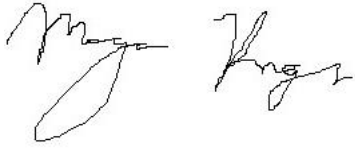
		supports outdoor recreation opportunities that contribute to community health and well-being.
Policy 8A-6.11	Community and subarea plans should be coordinated between state and local governments and private enterprises to identify and address the implementation of multimodal facilities that provide recreational transportation opportunities, support wildlife movement, and ensure as well as safe, efficient and convenient access to residential neighborhoods, schools, parks and recreation facilities, commercial districts, activity centers, tourist areas and established or planned multi-use trails.	See comments and resources above. As rural areas grow and develop, planning for safe wildlife movement now will help preserve natural pathways, which reduces habitat fragmentation and minimizes human-wildlife conflicts in the future. By ensuring that wildlife can safely move across the landscape, the County can avoid issues such as increased road crossings by animals, property damage, and potential safety risks for motorists.
Policy 8A-9.1	Scenic Roads Program – Encourage the state and federal Scenic Highways and Scenic Byways programs to ensure the preservation of scenic resources and wildlife habitat corridors along designated highways.	See comments above.
Policy 8A-11.4	Maintain a program for addressing traffic safety problems through monitoring of high incident conditions.	We recommend adding a policy in this section that emphasizes the need to track wildlife collision incidents to better inform traffic safety measures and future transportation development or redevelopment. An example policy might include: Implement a system to track and monitor incidents of wildlife collisions on County roads, using this data to inform and improve traffic safety measures, prioritize mitigation efforts, and reduce risks to both wildlife and motorists.
Policy Section 8A Land Use and Development	Prioritize the use of Low Impact Development (LID) techniques in all transportation projects to mitigate the harmful impacts of roadway runoff on critical salmon habitats. By incorporating	This policy is essential for Skagit County due to the significant role that roadway runoff plays in degrading water quality and impacting salmon populations. Chemicals like 6PPD-quinone, commonly found in tire wear, are highly toxic to salmon, and runoff from transportation projects

Suggested Policy	<p>permeable pavements, biofiltration swales, and rain gardens, the County can reduce the presence of toxic chemicals, such as 6PPD-quinone, which has been linked to salmon mortality. As a county with highly significant salmon populations, including threatened Chinook, Skagit County is committed to implementing LID practices that protect water quality, support salmon recovery efforts, and enhance overall watershed health.</p>	<p>can quickly carry these pollutants into waterways. By prioritizing Low Impact Development (LID) techniques, Skagit County can effectively filter and reduce harmful runoff, directly supporting salmon recovery efforts and preserving critical habitats. This proactive approach not only enhances water quality but also aligns with the County’s commitment to environmental stewardship and sustainable development.</p>
Policy section 8C Capital Improvements	<p>All transportation capital improvements shall incorporate removal of barriers to fish passage, where applicable. These projects will also consider wildlife habitat connection opportunities, pedestrian recreational connection opportunities, and climate-related adaptation potential.</p>	<p>We greatly appreciate this policy addition and suggest the adjacent edits in order to highlight the multi-benefit opportunities these types of projects present. For example, redeveloping culverts into larger underpasses offers Skagit County multiple benefits: it enhances habitat connectivity, provides an opportunity for pedestrian linkages, and prepares infrastructure for increased climate-related flow conditions. By planning for these integrated outcomes, the County can create resilient and multi-functional infrastructure that may qualify for unique funding sources targeting climate adaptation, habitat restoration, and multimodal transportation projects. See resources related to our comments for sections 10A and 8A above.</p>

Please see the [Sound Choices Checklist](#) for additional guidance for all elements of the Comprehensive Plan.

Thank you for taking the time to consider our recommendations to better reflect the best available science for fish and wildlife habitats and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don’t hesitate to contact me.

Sincerely,



Morgan Krueger, Regional Land Use Lead
Morgan.Krueger@dfw.wa.gov

CC:

Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)

Marian Berejikian, Environmental Planner (Marian.Berejikian@dfw.wa.gov)

Tim Stapleton, Regional Habitat Program Manager (Timothy.Stapleton@dfw.wa.gov)

Marcus Reaves, Assistant Regional Habitat Program Manager (Marcus.Reaves@dfw.wa.gov)

Alex Richard, Habitat Biologist (Alexander.Richard@dfw.wa.gov)

Region 4 Northern District (R4NPlanning@dfw.wa.gov)

Lexine Long, WA Department of Commerce (Lexine.Long@commerce.wa.gov)

Tara Satushek

From: PDS comments
Sent: Wednesday, October 23, 2024 7:45 AM
To: Tara Satushek
Subject: FW: Skagit County's 2025 Comprehensive Plan Draft Policies- Utilities, Capital Facilities and Transportation Elements

FYI -

From: Molly Doran <mollyd@skagitlandtrust.org>
Sent: Tuesday, October 22, 2024 5:24 PM
To: PDS comments <pdscomments@co.skagit.wa.us>
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies- Utilities, Capital Facilities and Transportation Elements

Skagit Land Trust Comments to Skagit County on Utilities, Capital Facilities and Transportation Elements

Thank you for the opportunity to comment on preliminary policy revisions to the Skagit County Comprehensive Plan Utilities, Capital Facilities and Transportation Elements.

Skagit Land Trust conserves wildlife habitat, agricultural and forest lands, scenic open space, wetlands, and shorelines for the benefit of our community and as a legacy for future generations. Our organization has over 1,700 family and business supporters (members) and 500 active volunteers who work to protect the most important and beloved places in Skagit County. Today, the Trust protects more than 10,000 acres, including more than 50 miles of shoreline. Our comments draw from this mission and seek to ensure that the Skagit County Comprehensive Plan works to maintain the resilience of Skagit County's natural environment in the face of population growth and the impacts of climate change.

Comments Regarding Utilities and Capital Facilities Elements

Establish a Broad Green Energy Strategy

Skagit Land Trust asks that you recognize that as our county shifts to renewable energy sources **we need a broader green energy strategy** that takes into consideration a panoply of safety, natural resource and environmental considerations. The Goldeneye BESS application put Skagit County on notice that it should study all types of renewable energy facilities (BESS, industrial scale wind and solar etc.) and evaluate carefully where they should best be sited, considering not just what our valley looks like now but what it will look like in 80 or 100 years as climate change alters our landscape with increased flooding, storm surges, wildfires, drought, and other climate intensified consequences. We ask the County to map and write Comprehensive Plan policies and development regulations for where they **don't belong**, as well as mapping and regulations for where they **can be sited** with the least conflict. Areas zoned industrial and out of the floodplain are good examples of possible "least conflict" sites.

The County should be proactive, mapping and developing policy and code now so that the County, not the developers, remains in charge. The County should clearly state, "Here are the places we will entertain allowing your facility to be built", rather than just responding to the developers' proposals.

We would also like to see a new policy added to the Utilities Element concerning the **siting of hazardous energy facilities**.

Carefully Site Hazardous Energy Facilities

New energy infrastructure facilities, such as substations and Battery Energy Storage Systems, should only be allowed in climate resilient locations. These facilities should not be built in floodplains (or areas likely to become floodplains over time due to climate change), where spills or fires could contaminate waterways, nor close to forests to which fire could spread. They also should not be built close to residential areas where people would be in jeopardy from toxic gases and possibly be affected by prolonged loud noise from the fans needed to continuously cool the lithium-ion batteries.

BESSs will be increasingly important as we rely more on wind and solar power. Unfortunately, siting them is challenging. Commercial and industrial areas out of the floodplain and away from residential areas would seem to be best. They do need to be near large substations, which severely limits the choices. But rather than building very expensive new energy facilities next to existing substations in high-risk locations, there should be planning to move substations or build new substations in more suitable locations that carry fewer risks to human and environmental health.

Support Community Solar

Consider a policy or policies encouraging community solar installations such as currently exist in several places in Anacortes to allow individuals who would like solar but can't afford it or whose property isn't solar appropriate to invest in solar arrays on public buildings and then get a share of the electricity. Community solar allows for smaller arrays than large solar farms, which would take up farmland. County-owned buildings and parking lots are examples of locations appropriate for community solar.

Comments Regarding the Transportation Element

Expand Electrical Vehicle Charging

We suggest a policy supporting the expansion of electrical vehicle charging infrastructure throughout Skagit County. There are no public electric vehicle (EV) charging stations east of Interstate 5. We conduct a lot of work upriver and have an EV truck. The absence of charging stations limits when and where we can work, and no doubt creates a significant disincentive to others buying and using EVs.

Support Multi-Modal Transportation System

We strongly support revised and newly proposed policies included in the draft Transportation Element calling for the expansion of public transportation and multimodal transportation options such as bike lanes, sidewalks and trails. As pointed out in the Kimberly Horn memo dated September 13, 2024, to the Planning Department: "Transportation element requirements have changed from auto-oriented to multimodal with an emphasis on active/human-powered modes, such as walking, biking, and rolling (wheelchairs, mobility devices, etc.). The GMA now requires policies to address: • ADA Transition Plans • Multimodal Level of Service (MMLoS) • Active transportation networks • Complete Streets for County roads and State highways • Safety for Vulnerable Road Users • Equity in transportation investments • Transportation/Land Use integration • Reduction of Vehicle Miles Traveled (VMT) • Reduction of Greenhouse Gas (GHG) emissions."

While the specific revised/new policies in the Transportation Element are too numerous to mention, these are all positive additions.

Update Skagit County Open Space Concept Plan

Multi-use trails that connect cities and towns and green space around them are included in Skagit County's 2009 Open Space Concept Plan. We believe this plan should be updated with climate change in mind. The plan helps focus ours and others' conservation work around these cities and towns.

- A considerable amount of greenbelt and open space in the County's current Open Space Concept Plan has been accomplished by the County, conservation organizations such as Skagit Land Trust, cities, Port, agencies, Tribes etc. However, the green space/open space elements of the plan need to be updated to

include key unprotected areas for fish and wildlife habitat particularly for at-risk species, increased storm water runoff and floodwater storage, natural heat sinks near cities and towns, nature parks near growing populations centers, access points to water etc.

- The trails section of the Open Space Concept Plan has not seen as much accomplished and needs to be updated with denser cities in mind. Right now it is very unsafe to bike to cities from a rural area or between cities and towns. It is not easy to get to rural areas for recreation by foot or bike. Trails encourage people to walk, use bikes, etc. rather than cars. More people will chose to live in cities if they know they can easily visit rural areas without getting in car. The County needs to understand where multi-use trails should be located to assist with emission reductions.
- Make completing the Centennial Trail from Snohomish County to Whatcom County a priority.
- Develop a bike path from Edison to Burlington. The Samish Flats are a tourism site needing safer passage for bikers and walkers.
- Map and identify roads that are currently dangerous for cyclists and develop plans to make them safer. Example: Bike safety on bridges. The Fir Island Road bridge over the North Fork of the Skagit River is old, has no shoulders, and is used regularly by semi-trucks. Cyclists routinely use it as they pedal from Conway to the Skagit Flats and La Conner, especially during the Tulip Festival. The Highway 536 bridge from downtown Mount Vernon to West Mount Vernon and the Highway 9 bridge near Sedro-Woolley are also dangerous. Plan now for adding shoulders or specific bike lanes when replacing those bridges.
- Recognize the rise of e-bikes, their potential use for commuting, and make chargers and safe routes available.

Additionally, we would like to see new policies supporting the following:

- Develop ways to open more public access trails on dikes. Develop incentives and protections for dike districts and adjacent landowners.
- Develop additional trails to attract recreationists and eco-tourists (such as birders) increasing the county's tourist economy without increasing the carbon footprint. Eco-tourism contributes over \$20 billion to Washington's GDP and is growing. Skagit County is uniquely positioned to capitalize on this trend with more tourist infrastructure such as trails and wildlife viewing sites.

Submitted by Skagit Land Trust
Executive Director, Molly Doran
1020 S 3rd Street
Mount Vernon WA
98273

Tara Satushek

From: Liam Diephuis <lr_diephuis@gmail.com>
Sent: Thursday, October 24, 2024 1:28 PM
To: PDS comments
Subject: Transportation Preliminary Policy Revisions

Dear planning commission,

I am very happy to see the variety of policy revisions with stronger language for multimodal and active transport modes in the Transportation element of the Comp Plan Update. There is one big way that I think the revisions could be better, and that is by specifying more protected environments for active transportation modes. Policy numbers 8A6 and 8A6.4 encourage public education for pedestrian and cyclist safety, but public education isn't always enough to prevent speeding or reckless driving on county roads where wide lanes enable high speeds, and the lack of other cycling- or pedestrian-only pathways forces active travelers onto the roads. Please consider a policy revision stating that when pedestrian, cycling, or transit facilities are on the same right-of-way as county roads, protection in the form of physical barriers of some type will be required.

Thank you,
-Liam Diephuis
414 Park Street,
Mount Vernon, WA 98273



Skagit Audubon Society
P.O. Box 1101
Mount Vernon, WA 98273

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OCT 24 2024
SKAGIT COUNTY
PDS

October 24, 2024

Planning and Development Services
Comments on "Skagit County's 2025 Comprehensive Plan Draft Policies"
1800 Continental Place
Mount Vernon WA 98273

Re: Comments on the Preliminary Policy Revisions of the Utilities and Transportation
Comprehensive Plan Elements

Dear Members of the Skagit County Planning Commission and the Planning & Development
Services Staff:

I am writing on behalf of Skagit Audubon Society to offer comments on the draft update of the
Utilities and Transportation elements of the Skagit County Comprehensive Plan. We appreciate
the opportunity to participate in the update process and have attended several of the open
houses to contribute comments there.

Skagit Audubon is the local chapter of the National Audubon Society. Our 486 members share
an interest in birds and other wildlife and in protecting and restoring the habitats on which they
depend. In addition to rivers, streams, the marine environment, and undeveloped land, these
habitats include agricultural lands and working forests which also important for wildlife. Skagit
Audubon's members value the birds, varied habitats, and protected rural character of our
county and want the Comprehensive Plan policies to protect these while also proactively
moving our community towards a green energy future.

I would note here that in our comments Skagit Audubon's emphasis on addressing climate
change and its effects is consistent with our mission in that National Audubon research has
identified climate change as the single greatest threat to birds.¹

We have reviewed the preliminary policy revisions of the Transportation and Utilities elements
and offer the following comments and suggestions.

Utilities

1. Plan for appropriate siting of energy generation and storage facilities.

In Policy 9A-3 (Utility Facility Siting), we note "Siting at Critical Areas" (9A-3.1) states that,
"utility facilities are not sited in designated critical areas unless feasible alternatives are
unavailable" and that 9A-3.2 allows for "Siting of Major Facilities" in residential or rural areas
if the facilities are visually screened. The recent Goldeneye proposal to site a Battery Energy
Storage System (BESS) along salmon-bearing Hansen Creek on agricultural land in the
floodplain of both the creek and the Skagit River supports our belief that these policies need to

¹ <https://www.audubon.org/climate/survivalbydegrees>

be strengthened. Just as the Board of County Commissioners, Skagit Audubon commented to the Energy Facility Site Evaluation Council in opposition to the Goldeneye proposal.²

Skagit County's policy on siting energy facilities needs to be strengthened to leave much less leeway for energy facilities to be located in these inappropriate locations. We would like to see a policy stating that the county will develop a proactive plan for the appropriate siting of energy facilities, including substations, BESS, solar, wind, or other energy-related infrastructure rather than reacting anew to each permit application. We believe policy is also needed to address relocating energy facilities presently located in the 100-year flood plain or other vulnerable areas where they should not have been built and will increasingly be in jeopardy as the climate changes. The major substation along Hansen Creek by the proposed site of the Goldeneye BESS is such a facility. Audubon is strongly supportive of the necessary transition away from dependence on fossil fuels, and we want our county to be planning for a green energy future with all urgency. The future is not going to look like the present or the past, and we want our Planning Commission and planning staff to be forward-thinking about both meeting energy needs and protecting the environment we all value.

2. Include a policy to develop community solar on county-owned infrastructure.

We note that the sole reference to solar energy in the Utilities element is in policy 9A-5.6 stating that, "use of solar energy for water and space heating should be encouraged." We believe that more Skagit County residents would take advantage of financial incentives and the decreasing costs of solar electric systems if their residences provided appropriate siting in terms of orientation and shading. To provide these residents the opportunity to access solar-generated electricity we would like to see a policy actively encouraging development of community solar projects on publicly owned buildings and over publicly owned parking areas. As many of us know from experience, solar electric is a viable option even in often cloudy western Washington, but we do not want to see large scale commercial solar facilities on farmland or displacing working forests. Therefore, distributed solar, including community solar on public or large commercial buildings and parking areas, should be the focus. We would particularly like to see a policy stating that Skagit County will actively pursue development of community solar projects on county-owned structures and over county-owned parking.

Transportation

1. Skagit County needs a broader and more connected system of bicycle paths.

We strongly support policy 8A-6: "Provide a safe and efficient network of trails and bikeways, including both on- and off-road facilities that link populated areas of the County with important travel destinations." It has long been evident during such events as the Tulip Festival that Skagit County residents and visitors would benefit from a much expanded network of safe roadside bike lanes and also bike paths away from roads. The sudden proliferation of e-bikes

2

<https://static1.squarespace.com/static/6474fc5db738031c56c2f6c4/t/671569d70b23760fe916e70c/1729456600471/Skagit+Audubon+comments+on+proposed+BESS+facility+near+Sedro-Woolley.pdf>

also makes it more feasible in good weather to commute to school and work without driving. We would like to see policies encouraging an extensive bike lane and path network for the sake of reducing miles driven, alleviating road congestion, and, in the case of conventional bicycles, supporting community health.

2. Improve bicycling safety on bridges.

We note that policy 8A-1.5 addresses new bridge construction over the Skagit River. Here and elsewhere as appropriate in the Transportation policies we would like to see attention to improving the safety of bicycling over the county's bridges. For example, the Route 9 bridge over the Skagit and the Best Road bridge connecting Fir Island have no space for bicycles or pedestrians out of the vehicle travel lanes. The same is true for the Route 9 bridge over the Nookachamps near the Big Rock roundabout. Policy should call for providing bike lanes on these and all other bridges when they are replaced or sooner if possible.

3. Road improvements in agricultural areas would reduce congestion and conflict while improving safety.

Wintering raptors on Samish Flats and swans, snow geese, and other bird species on Fir Island and other areas of the county attract thousands of visitors to Skagit County who support the local economy by their expenditures. The vast majority of these visitors are not Skagit Audubon members, but out of concern for visitors' at times inappropriate behavior creating safety problems, interference with agricultural operations, or detriment to the birds, our group participates in the Be Bird Wise program led by Skagitonians to Preserve Farmland.³ We note that policy 8A-1.7 states, "Natural Resource Industries – consider the transportation needs of the agriculture and forest products industries when making decisions about the management and maintenance of the roadway system." We suggest expanding this policy or writing a separate one stating that roadways in agricultural areas that attract birdwatchers will be modified to improve safety and reduce user conflicts. This could include full-width breakdown lanes to allow wildlife watchers to pull completely off the travel lane thereby avoiding collision and not impeding movement of agricultural equipment. A policy could also call for appropriately sited small parking areas on non-agriculturally productive land such as the lot recently developed on Washington Department of Fish and Wildlife property near the Samish River at an area popular with wildlife photographers and waterfowl hunters.

4. A plan is needed for addressing the impacts of sea level rise and flooding on roads and other critical infrastructure.

The Transportation element policies do not mention sea level rise or either coastal or river flooding. Perhaps the plan is to address these in the new Climate Element? Either way, it would make sense to integrate climate-related considerations in other elements too, such as Transportation. We support having a policy that the county will map areas vulnerable to sea level rise and increased river flooding, assuming such a map does not already exist, with an emphasis on roads and other key infrastructure at risk. The flooding of Samish Island Road and in La Conner and Edison during king tides two winters ago gives a foretaste of what is to

come. The suggested policy should say that mapping is the first step towards creating a priority list of projects to address the threat and pursue the needed funding. Skagit Audubon's interest in this, in addition to our members being local residents, is that sea level rise will increasingly drown the few acres of remaining tidal marsh and spawning beaches against the coastal dikes. The vegetation provides a natural buffer to waves, thereby helping reduce their erosive energy and is also important habitat for birds and other species. Spawning beaches are essential to the reproduction of forage fish such as smelt and sand lance that are the base of the food chain for sea birds, salmon, and marine mammals including the endangered Southern Resident Killer Whales.

Thank you for your attention to our comments. We look forward to seeing future iterations of the Comprehensive Plan updated policies.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Manns", written in a cursive style.

Timothy Manns
Conservation Chair, for the Skagit Audubon Board

Tara Satushek

From: Aaron Weinberg <Aaron@skagit.org>
Sent: Thursday, October 24, 2024 4:10 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

The Economic Development Alliance of Skagit County suggests calling out the need for public transportation to work with industry (large businesses) who have emerging public transportation needs.

Aaron Weinberg

Economic Development Manager – Special Projects

Economic Development Alliance of Skagit County

1932 E. College Way, Suite B

PO Box 40

Mount Vernon, WA 98273

Office: 360.336.6114 ext. 101

Direct: 360.639.8849

www.skagit.org

email: aaron@skagit.org

he/him

EDASC carries out business attraction, retention and expansion, and collaborative engagement to achieve a prosperous, sustainable and equitable community while maintaining Skagit County's natural beauty and quality of life.

