



Planning & Development Services

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Public Comments on Preliminary Amendments to Rural and Natural Resource Lands Elements

Count	Last Name	First Name	Organization/Address	Type of Comment Method	Date Received
1	Hutchison	Jen	Planning Commission	Email	08/09/2024
2	Day	Angela	Planning Commission	Email	08/01/2024
3	Krueger	Morgan	WDFW	Email/Letter	08/22/2024
4	Loring	Kyle	Rep. Evergreen Islands	Email	08/19/2024
5	Trohimovich	Tim	Futurewise	Email	08/20/2024
6	Rubenstein	Kim	Skagitonians to Preserve Farmland	Email/Letter	08/21/2024
7	Friebel	Jenna	Skagit Drainage and Irrigation Districts Consortium LLC	Email	08/21/2024
8	Hughes	Michael	Agricultural Advisory Board	Email/Letter	08/22/2024
9	Bynum	Ellen	Friends of Skagit County	Email	08/22/2024
10	Diephuis	Liam		Email	08/21/2024
11	Doran	Molly	Skagit Land Trust	Email	08/21/2024
12	Rowe	Kara	Western Washington Agricultural Association	Email	08/22/2024
13	Weinberg	Aaron	EDASC	Email	08/22/2024

Tara Satushek

From: Jennifer Hutchison <jhutchison@skagitgov.net>
Sent: Friday, August 9, 2024 8:23 AM
To: Robby Eckroth
Cc: Tara Satushek; Jack Moore; Allen Rozema
Subject: Re: Planning Commission Materials for July 23

Good Friday morning All,

I am checking to see if Appendix B has had further modifications since our last review.

I am also curious is any public comments have been submitted addressing our work related to rural and NRL sections to date.

As for my input I will reference the page # and Policy # to help navigate the few remarks I wish to share with the Department.

P.11-38.1.7 proposed new policy, final paragraph: in "marblemount area" does this deserve a more refined boundary detail?

p.12-38.1.9 proposed revision, final paragraph: "demonstration program" suggest elaboration or omission of this statement.

p.19-3c.2.1 Just a typo in 1st word of paragraph. Remove "locate" correct "New"

p.21-3c.2.5 same 1st word typo, Omit "provides for" and Cap "A range"

That is all I have for you today but look forward to seeing any additional edits that may have been worked up on the drafts since these versions had been shared.

Make it a great day!

Jen

On Tue, Jul 16, 2024 at 3:49 PM Robby Eckroth <reckroth@co.skagit.wa.us> wrote:

Dear Planning Commissioners,

Below is a list of meeting materials for next Tuesday's meeting, **July 23, 2024, at 6:00 PM**. We will be meeting in person in the Commissioners Hearing Room, 1800 Continental Place, Mount Vernon, WA 98273. This meeting is also provided as a virtual meeting. Zoom links are on the agenda.

Attached for your review:

- Meeting Agenda – July 23, 2024
- July 9, 2024, Meeting Minutes
- 2025 Periodic Comprehensive Plan Update - Planning Commission Briefing Memo
 - Appendix A, Rural Element Preliminary Policy Revisions
 - Appendix B, Natural Resource Lands Preliminary Policy Revisions

Please let me know if you have any questions.

Sincerely,



Robby Eckroth, AICP

Senior Planner

Planning and Development Services

1800 Continental Place

Mount Vernon, WA 98273

Direct (360) 416-1328 | Main (360) 416-1320

Email communications with county employees are public records and may be subject to disclosure, pursuant to RCW 42.56.

Angela Day's comments

Goal and Policy Amendments - Draft

Presented at the Planning Commission Meeting on July 23, 2024

General comments:

As we continue through these draft policy changes, it may be helpful to provide an overview of the components of the current comprehensive plan. I found it helpful to review the current comp plan and noted that each of the policies are associated with a goal. The policy revisions provided to us at the last meeting don't include all the goals. For future drafts, it would be helpful to include all the goals, and also to more clearly distinguish the goals from the policy language.

A second suggestion is that It would be helpful to identify the scope and themes of the current comp plan update. For example, the 2016 plan includes a scope that describes the focus areas, priorities and themes for the 2016 update. Has that been established for the current update?

A third question is related to the public participation process. The 2016 comp plan revisions were guided by citizen steering and technical committees (see p. 17, 18). Aside from the community survey and pop-ups, is there a plan to engage citizen committees in this revision?

Appendix A

Rural Element

These proposed changes help to clarify the existing language. As I read the proposed changes, I found the most confusing aspects to be related to the various land use designations in rural areas. This includes their intent and allowed uses. If there is a way to reorganize the policies to more systematically describe the various designations, their uses, purposes, limitations, and/or opportunities for expansion, that may be helpful. If there is a goal related to each of these, including the goals and highlighting them as such may be helpful.

Thank you for the opportunity to review the craft changes, ask questions, and make suggestions.

Appendix A

Rural Element

Policy 3A-2

Provide for a variety of residential densities and affordable housing types, and business uses that maintain rural character, respect farming and forestry, buffer natural resource lands, retain open space, minimize the demand and cost of public infrastructure improvements, availability of public water systems, provide for future Urban Growth Area expansion if needed, and allow rural property owners reasonable economic opportunities for the use of their land.

Comment: It is not clear how this new phrase related to public water systems should be read. Is it to minimize the demand and cost of public infrastructure improvements *including* water systems? Or is this new phrase suggesting that providing for a variety of residential densities is contingent upon water system availability? It would be helpful to clarify.

3B – 1.1

Establish the logical outer boundary of an area of more intensive rural development as follows:

- (i) Ensure preservation of the character of existing natural neighborhoods and communities;
- (ii) Follow physical boundaries such as bodies of water, streets and highways, and land forms and contours,
- (iii) Prevent abnormally irregular boundaries, and
- (iv) Provide public facilities and public services in a manner that does not permit low-density sprawl;
- (d) Shall not extend beyond the existing areas or uses as described above is one that was in existence on July 1, 1990.

Comment: It is a bit confusing whether the LAMIRD boundaries have been established. Proposed revisions to 3B -1.0 suggest that they have already been established, as “establish” is changed to “allow.”

So, my questions are 1) are the boundaries of LAMIRDs currently established? 2) is it clear where more intense uses are allowed in LAMIRDs? (see question below) 3) is there any flexibility about new LAMIRDs based on the RCW? (See proposed changes in 3B – 1.4 that refers to minimizing and containing LAMIRDs). It seems that these areas may be necessary to achieving rural housing and job creation goals in the county.

3B – 1.2

~~The GMA establishes three basic types of LAMIRD. Allow type 1 LAMIRD The first is authorized by RCW 36.70A.070(5)(d)(i) consisting of infill in commercial, industrial, residential, or mixed use areas that were in existence on July 1, 1990, and that are surrounded by logical outer boundaries. in the following land use designations....~~

Comment: Perhaps this is clear to planners or other professionals, but I find allowing “infill” to be a bit confusing. Are these areas already designated as LAMIRDs, or does it require a study of the zoning map to determine where infill might be allowed?

3B – 1.7

Apply type 3 LAMIRD for isolated nonresidential uses or new development of isolated cottage industries in the following land use designations:

Comment: The term “apply” here is a bit confusing. It seems like it might be more consistent to use the term “allow” which is proposed in the new language regarding Type 1 LAMIRDs.

The three different types of LAMIRDs are confusing ☺

3B – 1.8

What is the difference between a LAMIRD, Rural Center, Rural Village and Rural Business? (I see that policies in the 3C section further define the intent and uses in these types of designations. It may be helpful to organize these differently and/or to include a chart).

3C – 1.2 and 3C – 1.3

Again, instead of using the term “apply” here, would it be more consistent to use “allow”?

3C – 1.7

Intent of Rural Villages is to represent historical communities throughout the County with future development limited to infill within designated boundaries

Comment: Consider eliminating “Intent of” to read instead “Rural Villages represent historical communities...”

3C – 1.9

Allow Single-family residential densities for land designated as Rural Village Residential **are as follows:**

Comment: consider removing “are”

3C – 2.1

Locate new rural commercial and industrial uses **should be located principally** within designated commercial areas to avoid the proliferation of commercial businesses throughout the rural area

Comment: consider removing the highlighted text

Appendix B

Natural Resource Lands

Goal 4A

Proposed

Designate Agricultural Resource

Lands ~~are these~~ lands ~~considering with~~ soils, climate, topography, parcel size, and location characteristics that have long-term commercial significance for farming. Skagit County is committed to preserving and enhancing the agricultural land base and promoting economic activities and marketing support for a strong agricultural industry. ~~The agricultural community faces significant challenges in preserving the agricultural land base and a viable agricultural industry, including: conversion of agricultural lands to development and inappropriate habitat restoration; conflict with neighboring residential uses; drainage impacts; and other disruption of agricultural lands functions and values. The following policies are intended to e~~Ensure the stability and productivity of agriculture in Skagit County.

Comment: These revisions lose a lot of the meaning and context in the existing language. Also, using the verb “designate” makes it seem as though these lands have not already been designated, which I don’t believe is accurate. Rather than use “designate” as the active verb, consider preserve and enhance instead at the beginning of the paragraph.

Based on my understanding of the VSP program, this would not be a substitute for the County maintaining an Agricultural Resource Lands Database. I suggest keeping the language with the new active voice changes proposed.

4A – 2.8

This is a good question regarding the resource lands clearinghouse. One question is whether and how this might overlap with the database mentioned in the previous comment. Also, it seems that the conservation district may already have something like this in place?

4A – 4.1

Existing

Agricultural Production: Agricultural production is the highest priority use in designated agricultural resource lands.

Proposed

"Provide regulations that make agricultural production the highest priority use in..."

Comment: this change to an active verb changes the meaning significantly. The existing language does not mention regulations. I suggest keeping the original intent and using active verbs like prioritize and encourage, unless a different policy direction is supported by stakeholders.

4A – 4.5 and 4B-5.6

Limiting impacts from special events and activities. I propose the following addition in the last sentence "Those impacts include but are not limited to traffic, noise, litter, trespass, and sanitation."

4A – 5.1 and 4B-2.6

Start with an active verb: "Apply Goal E, Right to Management Natural Resource Lands to all lands designated..."

Comment: consider correcting the grammar

Goal 4B and 4B-3.3

This changes to an active verb “designate” rather than describing characteristics of Forest Resource Lands. This is similar to the agricultural lands proposed change. Have Forest Resource Lands already been designated? Would it make more sense to use language like preserve and enhance the forest land base?

4D-6.5

Aquifer reclamation

Comment: The proposed change introduces the active verb “ensure.” Are there any risks with using the verb “ensure” in this or other policies? Would “require” be a better verb?

4E

Active verb: Ensure right to management Natural Resource Lands:...

Consider correcting the grammar



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

August 22, 2024

Robby Eckroth, Senior Planner
1800 Continental Pl
Mount Vernon, WA 98273
pdscomments@co.skagit.wa.us
reckroth@co.skagit.wa.us

RE: Case # 2022-C-307, WDFW comments for Skagit County’s draft Rural and Natural Resource Lands 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
Rural Element		
3A Page 1 of 91	Protect the rural landscape, character, and lifestyle by: (a) Defining and identifying rural lands for long-term use and conservation; (b) Providing for a variety of rural densities and housing opportunities; (c) Maintaining the character and historic and cultural roles of existing rural communities; (d) Allowing land uses which are	We suggest including the adjacent addition to avoid the increase in safety concerns as it relates to wildlife collisions. To accomplish this goal, we suggest Skagit County: <ul style="list-style-type: none"> - Create a list of potential non-developable properties that could be acquired. - Require the setting aside of natural spaces during the platting process.

	<p>compatible and in keeping with the protection of important rural landscape features, resources, and values; (e) Encouraging economic prosperity for rural areas; and (f) Ensuring that appropriate and adequate rural levels of service are provided; and (g) Avoiding wildlife conflicts by siting major development away from habitat corridors.</p>	<ul style="list-style-type: none"> - Employing wide bridges instead of culverts to facilitate wildlife passage under roads. <p>As population densities increase, it is crucial to plan for wildlife movement now to avoid major conflict in the future, especially in rural areas that are near urban areas or in areas slated for future growth.</p> <p>For additional 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>3A-2 Page 1 of 91</p>	<p>Provide for a variety of residential densities and affordable housing types, and business uses that maintain rural character, respect farming and forestry, buffer natural resource lands, retain open space, minimize the demand and cost of public infrastructure improvements, minimize the risk for increased wildlife conflict, availability of public water systems, provide for future Urban Growth Area expansion if needed, and allow rural property owners reasonable economic opportunities for the use of their land.</p>	<p>See comments above.</p>
<p>3A-3.3 Page 4 of 91</p>	<p>Standards and plans for structures, roads and utility systems, and other public services and facilities shall be consistent with rural densities and uses. Such facilities and services shall be such designed, constructed, and provided to minimize the alteration of the landscape and the impacts to rural residents and community character, to preserve natural systems, to protect critical areas, to protect important land</p>	<p>Protecting essential public facilities and the services they provide from future climate-related impacts helps ensure community resilience for the entire operational lifespan of the facility. We suggest updating zoning to allow public, essential, or hazardous uses only in low-risk areas and assess risk when new facilities are proposed. As noted in FEMA’s National Flood Insurance Program Community Rating System Coordinator’s Manual, higher regulatory standards also gain credits to reduce premiums.</p> <p>As FEMA’s Flood Insurance Rate Map (FIRM) modeling does not consider climate change</p>

	features such as ridgelines, to anticipate future natural hazards, to retain historic and cultural structures/landscapes, and scenic amenities.	projections, we suggest Skagit County supplement FIRM maps with regulations that take Best Available Science (BAS) into consideration, including future climate-related projections. For example, King County regulations place ‘ Flood Protection Elevations ’ three feet above base flood elevation for development within flood-prone areas. For assessing future conditions, see Climate Mapping for a Resilient Washington , as well as FEMA’s Resilience Analysis and Planning Tool (RAPT) .
3A-3.5 Page 5 of 91	On-site wastewater systems are preferred to treat and dispose of effluent in rural areas. Community on-site systems or decentralized treatment systems may be used in land divisions or to serve limited areas of more intensive rural development (LAMIRDs).(a) The size of a community or large on-site sewage system for a designated LAMIRD shall be limited....(b) The size of a community or large on-site sewage system for a land division shall be limited to the number of residential units allowed under the land division...(c) The siting of a community or large on-site sewage system shall be outside of hazardous areas subject to frequent or potential flooding.	The State Department of Health adopted rules establishing public health standards for location, design, installation, operation, maintenance, and monitoring of onsite sewage systems (OSS), including the responsibility for jurisdictions to identify any areas where OSS could pose an increased public health risk. The list of areas to identify includes frequently flooded areas, which should be mentioned here given the flooding concerns Skagit County has faced and will face into the future. See resources in the above comment to assess future flooding potential.
3C-1.4 Page 15 of 91	The purpose of the Rural Intermediate designation is to provide and protect land for residential living in a rural atmosphere, taking priority over, but not precluding, limited non-residential uses appropriate to the density and character of this designation. Long-term open space retention and critical area protection is required and encouraged.	Open space retention and critical area protection are required under GMA (WAC 365-196-335 , WAC 365-196-830). For rural designation, the GMA states “(b) The act identifies rural character as patterns of land use and development that: (i) Allow open space, the natural landscape, and vegetation to predominate over the built environment;... (iv) Are compatible with the use of land by wildlife and for fish and wildlife habitat;...” (WAC 365-196-425).
3C-1.6	Rural Villages shall be located only in designated Rural areas.	Carefully consider the placement of Rural Villages to avoid sprawl and ensure that essential public

Page 15 of 91	Rural Village designation and densities are based on existing rural residential and commercial development patterns and uses, environmental constraints, presence of critical areas, proximity to designated natural resource lands, and adequate capacity to maintain existing rural levels of service.	facilities and infrastructure can service the village without violating the Growth Management Act.
3C-3.2 Page 27 of 91	New development at these locations is subject to development regulations and design guidelines intended to maintain the rural character of the area, and to minimize impacts to rural residential areas, resource lands, critical areas, and other sensitive natural features of the environment. Such development shall not be expanded into designated natural resource lands or create conflicts with natural resource practices, nor impede the use of land for fish and wildlife.	See comment regarding 3C-1.4 above.
3C-7.0 Page 33 of 91	Ensure adequate site opportunities for major industrial developments that have land needs that cannot be met in Urban Growth Areas while protecting critical areas and farmland from loss.	This is an open-ended statement that would benefit from including guidance on where major industrial developments would be most compatible.
3C-8.3 Pages 35-36 of 91	j) The Master Planned Resort shall contain sufficient portions of the site in undeveloped open space for buffering and recreational amenities to help preserve the natural and rural character of the area.	We recommend, in addition to the adjacent policy, that new and renovated infrastructure related to Master Planned Resorts meet green building and/or LEED standards, focusing on Low Impact Development (LID) design. Policies within the Comprehensive Plan that support salmon recovery, such as those related to LID, are essential. As stated in RCW 36.70A.172 , "...counties and cities shall give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries."

Natural Resource Lands Element

<p>4A-2.7 Page 47 of 91</p>	<p>Agricultural and Critical Areas: Consistent with the Growth Management Act, the County will a convene a watershed group to prepare a Voluntary Stewardship Work Plan for the Samish and Skagit watersheds in order to protect achieve no net loss of critical areas ecological values and functions and promote the viability of agriculture.</p>	<p>To align this policy with the Growth Management Act (GMA), we suggest using no net loss language (WAC 365-196-830).</p>
<p>4A-2.10 Page 48 of 91</p>	<p>Sustainable Agricultural Practices: Information will be made available to landowners about sustainable agricultural practices, best management practices, and generally accepted management practices. Encourage new agricultural activities follow Best Management Practices that when used collectively provide riparian protection, source control, and filtration to prevent contributing pollutants to surface and ground waters to conserve important habitat areas for salmonids and shorebirds while maintaining working lands.</p>	<p>We suggest the adjacent addition to this policy to provide actionable language that describes the intent of policy goals. This suggested policy addition is taken directly from WDFW's Land Use Planning for Salmon, Steelhead, and Trout.</p> <p>Skagit County-relevant sustainable agriculture practices include the Nature Conservancy's Farming for Wildlife program within the Skagit Delta. This program's intent is to discover how habitat rotation can be compatible with crop rotations in the Skagit Valley. This effort aims to address wetland loss. As this program's webpage states, "In the Skagit Delta, we've lost 70 percent of estuarine and 90 percent of freshwater wetlands. Despite that loss, the Skagit Delta still supports 70 percent of Puget Sound shorebirds during migration." Shorebirds were found feeding in the pilot programs' fields rather than neighboring farm fields, and the soil condition in pilot fields measurably improved, highlighting a benefit for future farming.</p> <p>An additional program that addresses similar avenues for sustainable agriculture is the Nature Conservancy's publication, Leading at the Edge.</p>
<p>4B-2 Suggested Policy</p>	<p>Maintain and manage natural lands to maintain and/or increase carbon concentration and avoid conversion of carbon-rich ecosystems.</p>	<p>We suggest the ecosystem function noted in the adjacent suggested policy be of consideration to Skagit County's Forest Advisory Board (FAB). Protecting and restoring native vegetation can improve climate mitigation capacity and resilience benefits, which include carbon sequestration, cooling of air temperatures, providing shade that cools water temperatures, filters pollutants, etc. Local governments can employ many strategies for conserving natural lands for this purpose, including</p>

		zoning and acquisition. See the Trees for Resilience toolkit for resources related to mapping, policy and planning, funding, and more in pursuit of this goal. To quantify tree ecosystem service benefits, see the USDA Forest Service website .
4B-4 Suggested Policy	Use a range of tools, including land use designations, development regulations, level-of-service standards, and transfer or purchase of development rights to preserve Rural and Natural Resource Lands and focus urban development within the Urban Growth Area.	This policy suggestion comes from King County's Countywide Policy Planning DP-63 . The additional policy from this effort, listed below, outlines tactics on how to achieve this policy's goals: "Use transfer of development rights to shift potential development from the Rural Area and Natural Resource Lands into the Urban Growth Area. Implement transfer of development rights through a partnership between the County and cities that is designed to: Identify rural and resource sending sites that satisfy countywide conservation goals and are consistent with regionally coordinated transfer of development rights efforts; Preserve rural and resource lands of compelling interest countywide and to participating cities; Identify appropriate transfer of development rights receiving areas within cities; Identify incentives for city participation in regional transfer of development rights (i.e. county-to-city transfer of development rights); Develop interlocal agreements that allow rural and resource land development rights to be used in city receiving areas; Identify and secure opportunities to fund or finance infrastructure within city transfer of development rights receiving areas; and Be compatible with existing within-city transfer of development rights programs."
4B-5.4 Page 63 of 91	Recreational and Park Uses: Recreational opportunities on Forest Resource land shall be permitted uses where they will not conflict with forest practice activities on these lands or when such impacts can be fully mitigated. Proposed acquisitions of forest land for public recreational, wildlife viewing and habitat corridor linkage , scenic, and park purposes shall be	We appreciate this policy and suggest incorporating habitat corridor use in order to facilitate multi-benefit outcomes, with the goal of extending recreational opportunities in select areas that also offer wildlife corridor linkage benefits. Areas that offer little developable/resource extraction potential (encumbered by critical areas, too difficult to extract resources, etc.) should be prioritized for acquisition in order to achieve this goal.

	evaluated to determine the potential impacts on the economic viability and sustainability of forestry. Lands removed from forestry production for recreation, habitat , and park uses shall be included in the Converted Natural Resource Lands Database (Policy 4F1.4).	
4B-6.2 Page 64 of 91	Land Use Buffers: Land use buffers or setbacks intended to mitigate for critical areas or potential conflicts between residential and forestry uses shall be located on the area proposed for residential, or other non-resource use or development.	It is suggested that the language used in this policy is re-assessed to more accurately represent critical area buffer provisions. Buffers can not be dependent on residing within non-resource land as buffers are defined solely on the location of the critical area. The residential or non-resource land may not encompass the critical area buffer, expressing the obligation for the buffer to reside on resource lands.

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 habitat 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 or our Regional Land Use Lead, Morgan Krueger (morgan.krueger@dfw.wa.gov).

Sincerely,



Timothy Stapleton
Washington Department of Fish and Wildlife
Region 4 – Habitat Program Manager

CC:

Morgan Krueger, Region 4 Land Use Lead (morgan.krueger@dfw.wa.gov)
Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)
Marian Berejikian, Environmental Planner (Marian.Berejikian@dfw.wa.gov)
Marcus Reaves, Assistant Regional Habitat Program Manager (marcus.reaves@dfw.wa.gov)
Alex Richard, Habitat Biologist (alex.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: Monday, August 19, 2024 11:03 AM
To: Tara Satushek; Jack Moore; Allen Rozema
Cc: Robby Eckroth
Subject: FW: Skagit Cnty 2025 Comp Plan Draft Policies -- Resource Lands comments

FYI -

From: Kyle Loring <kyle@loringadvising.com>
Sent: Friday, August 16, 2024 1:31 PM
To: PDS comments <pdscomments@co.skagit.wa.us>
Cc: Marlene Finley <marlenefinley17@gmail.com>
Subject: Skagit Cnty 2025 Comp Plan Draft Policies -- Resource Lands comments

Dear Planning and Development Services,

I am submitting the following comments on behalf of Evergreen Islands to address the Natural Resource Lands Preliminary Policy Revisions. Evergreen Islands is based in Anacortes and dedicates itself to promoting, protecting, and defending Skagit County's unique saltwater island ecosystems and to ensuring that Skagit County manages the expansion of its built environment to protect local ecosystems.

We offer the following recommendations to address the preservation of natural resource lands as required by the Growth Management Act and to limit potential conflicts between those lands and local ecological protection:

- Goal 4A -- retain the term "with" rather than replacing it with the term "considering" so that the County designates lands as agricultural resource lands if they exhibit the characteristics identified in that paragraph. The proposal to replace "with" with "considering" changes the meaning of that paragraph to make it less certain that lands with soils, climate, topography, parcel size, and location suitable for long-term commercial significance for farming would be designated as agricultural resource lands.
- Policy 4A-1.2 -- rather than endeavoring to "minimize" the loss of agricultural lands, the policy should declare that Skagit County will achieve "no net loss" of agricultural lands with regard to requests to dedesignate those lands for more intensive uses, such as residential, commercial, and industrial uses.
- Policy 4A-2.7 -- the text regarding the Voluntary Stewardship Program should be revised or removed based on our understanding that Skagit County has already opted in to that program.
- Goal 4A-3 -- revise the current language "minimize non-farming uses on agricultural lands" so that it reads "prevent non-farming uses on agricultural lands where they are inconsistent with the use of those lands for agriculture" to ensure the preservation of agricultural lands for agricultural uses.
- Policy 4A-5.3 -- remove the term "within" to clarify that cluster development would not occur on agricultural lands so that those lands may continue to be used for agriculture.

- Policy 4B-1.4 -- replace "minimize" the loss of the resource land base with "prevent" the loss of the resource land base.
- Policy 4D-4.2 -- remove the policy allowing the granting of mining special use permits as an administrative permit that would not require hearing examiner approval to ensure that applications for mining activities receive a thorough review and so that community members who would be affected by the mine may be involved in the permitting process and can therefore protect their rights.

I invite you to contact me at your convenience if you have any questions about these comments.

Sincerely,
Kyle Loring

Kyle A Loring (*he/him*)
LORING ADVISING PLLC
PO Box 3356 | Friday Harbor, WA 98250
360-622-8060 | www.loringadvising.com

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Tara Satushek

From: PDS comments
Sent: Tuesday, August 20, 2024 3:54 PM
To: Tara Satushek; Jack Moore; Allen Rozema
Cc: Robby Eckroth
Subject: FW: Skagit County's 2025 Comprehensive Plan Draft Policies

From: Tim Trohimovich <Tim@futurewise.org>
Sent: Tuesday, August 20, 2024 3:00 PM
To: PDS comments <pdscomments@co.skagit.wa.us>
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Staff:

Thank you for the opportunity to comment on the 2025 Comprehensive Plan Update rural and natural resource lands draft policies. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including Skagit County. We have the following comments.

Comments on the First Draft Rural Policies

Policy 3A-2 revisions

Policy 3A-2 is proposed to be amended to provide for a variety of “affordable housing types.” The State of Washington Department of Commerce has documented that to provide housing affordable to families and individuals earning 80 percent or less of the county adjusted median income requires low-rise multifamily and mid-rise multifamily housing and potentially accessory dwelling units. Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Aug. 19, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh> Low-rise multifamily and mid-rise multifamily housing are urban uses and require sewers and other urban services. RCW 36.70A.070(5) prohibits urban uses outside urban growth areas. Even if this housing types were allowed, it would not be affordable to provide the public facilities and services they need. A peer-reviewed study shows that “the cost of providing public services in rural areas is 39% greater than in cities.” Ron Shani, Yaniv Reingewertz & Eran Vigoda-Gadot, *Far from-sight and expensive: additional costs of public services in rural areas* Local Government Studies p. 1, pp. 11 – 12 (22 Jun 2024), DOI: 10.1080/03003930.2024.2369784 last accessed on Aug. 13, 2024, at: <https://www.tandfonline.com/doi/pdf/10.1080/03003930.2024.2369784> It is better to focus these housing types in cities, towns, and urban growth areas where the public facilities and services they require can be more affordably provided. This is important because if the planned, but not economically feasible, capacity for affordable housing in rural areas is counted towards the affordable housing need then the County and its cities and towns will not have the capacity for the affordable housing the county needs.

Policy 3C-2.17

The Washington State Supreme Court has held that: “[Limited Areas of More Intense Rural Development] LAMIRDS are not intended for continued use as a planning device, rather, they are “intended to be a one-time

recognition of existing areas and uses and are not intended to be used continuously to meet needs (real or perceived) for additional commercial and industrial lands.’ *People for a Liveable Cmty. v. Jefferson County*, No. 03–2–0009c, 2003 GMHB LEXIS 34, at *2 (W. Wash. Growth Mgmt. Hr'gs Bd. Final Dec. and Order Aug. 22, 2003).” *Gold Star Resorts, Inc. v. Futurewise*, 167 Wn.2d 723, 727 – 28, 222 P.3d 791, 793 (2009). But Policy 3C-2.17 calls for the designation of additional LAMIRDs as a continued planning device decades after they should have been designed. Policy 3C-2.17 should be deleted to comply with the Growth Management Act.

Policy 3C-2.18

For the same reasons we support deleting Policy 3C-2.18.

Policy on overall levels of rural growth

Changes in Skagit County will directly impact the level of development that can be accommodated outside of urban growth areas. Most water in the Skagit “watershed is already legally spoken for or ‘appropriated.’” State of Washington Department of Ecology Water Resources Program, WRIAs 3 & 4 Skagit Watershed Water Availability p. 3 (Publication 20-11-003: May 2023) last accessed on Aug. 19, 2024, at: <https://apps.ecology.wa.gov/publications/documents/2011003.pdf> Water is already limited and changes in hydrology will make water scarcer in the summer in the future. *Id.*; *Skagit River Basin Climate Science Report: Executive Summary* p. 9 last accessed on Aug. 19, 2024, at: https://www.skagitcounty.net/EnvisionSkagit/Documents/ClimateChange/executive_summary.pdf Winter flooding will increase. *Skagit River Basin Climate Science Report: Executive Summary* pp. 9 – 11. Parts of Skagit County outside urban growth areas have an increased susceptibility to wildfires. *Skagit County Community Wildfire Protection Plan 2019 Update* pp. 20 – 21 last accessed on Aug. 19, 2024, at: <https://skagitcounty.net/EmergencyManagement/Documents/Skagit%20County%20CWPP.pdf> These and other changes will make accommodating rural growth more difficult, more costly, and will adversely affect water available for wildlife and irrigation. The County needs a policy managing both residential and commercial growth in the rural area if significant adverse impacts to rural development, agriculture, and other uses are to be avoided.

RCW 36.70A.070(2)(c) provides that the housing element within an urban growth area boundary is to consider duplexes, triplexes, and townhomes. Further, the middle housing requirements in RCW 36.70A.635 only apply to cities. Consequently, we recommend against trying to shoehorn these housing types into limited areas of more intense development as the new LAMIRD policy on page 12 of 91 calls for.

Comments on the First Draft Natural Resource Lands Policies

Policy 4A-1.1

We support the revisions to Policy 4A-1.1 so that the policy complies with the amendments to WAC 365-190-040 and WAC 365-190-050. These changes will better protect working farms and the county economy.

Adopt a policy prohibiting the transfer of agricultural water for rural residential development.

As was documented above, water is very limited in Skagit County. There will be pressure to transfer agricultural water to rural residential uses. Once this water is transferred, it will be lost to agriculture. While Skagit County cannot directly regulate water right transfers, it can use its zoning authority and subdivision authority to prohibit the use of agricultural water to mitigate rural residential and commercial developments. We urge the county to adopt a policy and regulation to this effect. It will aid the agricultural industry and the county economy long-term.

Policy 4B-1.1 and Policy 4B-3.3

We support the revisions to Policy 4B-1.1(e) and Policy 4B-3.3 so that they comply with the amendments to WAC 365-190-040 and WAC 365-190-060. These changes will better protect working forests and the county economy.

Policy 4B-1.3

We also support Policy 4B-1.3(e) for the same reasons.

New Policy on Wildland Urban Interface regulations and Policy 4B-2.11

Wildfire is a significant and increasing risk in Skagit County. *Skagit County Community Wildfire Protection Plan 2019 Update* pp. 20 – 21 last accessed on Aug. 19, 2024, at: <https://skagitcounty.net/EmergencyManagement/Documents/Skagit%20County%20CWPP.pdf>. Futurewise supports the New Policy on Wildland Urban Interface. We recommend it that it incorporate the Firewise principles such as “‘two ways out’ of the neighborhood for safe evacuation during a wildfire.” *Band Together Firewise USA® Program Toolkit* p. *9 last accessed on Aug. 19, 2024, at: <https://www.nfpa.org/downloadable-resources/firewise/firewise-band-together-toolkit>

Policy 4C-3.3

Policy 4C-3.3 currently reads: “Residential uses are allowed on Rural Resource Lands consistent with the density policies of this chapter.” Changing that policy to: “Allow residential uses on Rural Resource Lands consistent with the density policies of this chapter “ communicates more support for residential uses on Rural Resource Lands. Given the problems with rural residential development on resource lands, we recommend that this change not be made. *See for example* Tom Daniels, *What to Do About Rural Sprawl?* p. 3 (Paper Presented at The American Planning Association Conference, Seattle, WA: April 28, 1999) last accessed on Aug. 19, 2024, at: <https://mrsc.org/getmedia/40790EA0-E824-4F83-939E-C06A3AB1056D/ruralsprawl.aspx>

Goal 4D-1

We support these revisions to comply with WAC 365-190-040 and WAC 365-190-070. These changes will aid the construction industry and the county economy.

Policy 4D-5.8

Policy 4D-5.8 currently reads: “Chemical leach mining shall not be allowed until State laws are enacted which address their impacts.” This is a sound policy given the many adverse impacts of chemical leaching. It is also significantly different than “[l]imit Chemical Leach Mining until State laws are enacted which address their impacts.” We recommend you not make this change.

Thank you for considering our comments. Please contact me if you need anything else.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



Futurewise

1201 3rd Ave #2200, Seattle, WA 98101

(206) 343-0681

tim@futurewise.org

futurewise.org

connect:  

Tara Satushek

From: Elizabeth Lunney <interimdirector@skagitonians.org>
Sent: Wednesday, August 21, 2024 12:51 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Re-submitted, to include mailing address, on behalf of Kim Rubenstein, President, Board of Directors, Skagitonians to Preserve Farmland--

August 21, 2024

Skagit County Planning & Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Comments to Draft Skagit County 2025 Comprehensive Plan Update: Natural Resource Lands

Dear Planning Department:

Thank you for the opportunity to comment on the first draft of revisions released for the Natural Resource Lands element of Skagit County's 2025 Comprehensive Plan Update.

Our comments pertain the proposed revisions to Natural Resource Lands only. We recognize there will be draft revisions released for other elements of the Comprehensive Plan; these latter elements of the plan should not abrogate the protections established in the Natural Resource Lands draft. Comprehensive Plan revisions regarding housing, utilities and climate change, for example, have the potential to significantly impact Natural Resource Lands. The County must, at the end of the day, ensure a seamless and holistic plan that provides strong guidance, across the plan, to protect Skagit's unique agricultural resources.

Agriculture is a productive and vital part of the Skagit Valley economy. Continued viability depends upon protecting a critical mass of farmland, now zoned as Agricultural-Natural Resource Lands, capable of supporting Skagit's uniquely diverse agriculture industry. Thankfully, the County has a long history of public support for farmland protection. In 1996, a survey of registered voters in Skagit County demonstrated support for an increase in property taxes to purchase development rights on farmland, an expression of support that led directly to the creation of the Farmland Legacy Program. Even today, in surveys conducted for the County as part of this Comprehensive Plan Update, farmland preservation tops the list of citizen concerns across demographic bands. This update to the Comprehensive Plan provides an opportunity for Skagit County to further strengthen its protection of farmland by ensuring no further loss of farmland through the de-designation of Ag-NRL zoned lands, the elimination of incompatible uses, and the application of comprehensive and integrated planning with regards to natural resources in the Skagit Valley.

Our specific comments on the proposed changes to the proposed Natural Resource Lands revisions are as follows:

Policy 4A-1.1 - Eliminate Site-Specific Proposals to De-Designate Ag-NRL.

(e) Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.

Skagitonians supports and strongly encourages the County to adopt a policy of comprehensive analysis when considering de-designation of Ag-NRL. Furthermore, the 2025 Comprehensive Plan Update should clarify that the qualifying criteria listed in Policy 4A-1.1 are intended to provide guidance for *designation only*. (See comments below regarding Policy 4A-3.1)

As the plan is currently written, it is clear that some landowners and developers would choose to interpret the designating criteria of Policy 4A-1.1 as a roadmap to de-designation. For example, a landowner may cease active farming, whether due to economic hardship, personal circumstances or other. This period of inactivity does not in itself then make that property less suitable for Ag-NRL designation, and it should not be used as an argument to abandon Ag-NRL designation.

Policy 4A-2.4 - Maintain a database of current information on land uses, farming activities

Skagitonians appreciates the commitment the County has made to preserving agricultural lands. Given this, it is imperative that the County maintain accurate information about these lands in order measure progress against the goals listed in the Comprehensive Plan. A database as described has the benefit of establishing a solid baseline of information for use in evidence-based decision making.

Policy 4A-2.7 – Convene a watershed group to prepare and implement a Voluntary Stewardship Workplan

Skagit County faces some very complicated challenges regarding land protection, salmon recovery and the continued viability of agriculture. Skagitonians believes the development of an integrated Natural Resources Plan would provide the best means of strategically addressing these concerns and ensuring that resources are deployed effectively. As such, any discussion of Voluntary Stewardship Plans or other conservation measures should occur within the context of an overarching integrated Natural Resources Plan.

Policy 4A-3.1 – Remove reference to Policy 4A-1.1 as criteria to be used in de-designation

Long-Term Designation of Agricultural Lands: Designation of Agricultural Lands is intended to be long-term. De-designation is discouraged, but may be considered only when compelled by changes in public policy, errors in designation, new information on resource lands or critical areas, circumstances beyond the control of the landowner, or an overriding benefit to the agricultural industry. Evaluate de-designation requests with the same criteria under policy 4A-1.1 used for designation of Agricultural-Natural Resource Lands.

Skagitonians to Preserve farmland does not support language in the Comprehensive Plan that suggests the same criteria used to designate Ag-NRL land should be used for de-designation. This language should be removed and replaced with guidance for a comprehensive analysis that takes into account the commitment Skagit County has made to supporting local agriculture.

The guidance for de-designation listed in Policy 4A-3.1 provides a foundation for a comprehensive analysis, but the County should remove reference in Policy 4A-3.1 that points back to Policy 4A-1.1 as criteria for de-designation. Policy 4A-1.1 provides useful guidance, but a comprehensive analysis regarding potential de-designation should also weigh the full force and efficacy of Agricultural Support Programs identified in Goal 4A-2 before determining that an Ag-NRL designation should be abandoned. The County should first ask itself it more can be done to support farmland, and if acreage is removed from the Ag-NRL, what are the cumulative impacts to the County’s agricultural infrastructure and economy?

Policy 4A-4.6 – Habitat Restoration Projects

Habitat Restoration Projects: Habitat restoration projects are a permitted use on agricultural lands so long as it is shown through project review that the proposed restoration project does not have an adverse impact on hydrologic functions, drainage infrastructure or the ongoing agricultural use of adjacent properties.

As stated above, Skagitonians supports the development of an Integrated Watershed Plan to provide guidance on habitat restoration projects in the context of drainage infrastructure, hydrologic function and agricultural activity. Policy 4A-4.6 should be restated as follows: "Habitat restoration projects are not a permitted use on agricultural lands unless the project is consistent with a County-adopted Integrated Natural Resources Plan."

Thank you for the opportunity to comment on this element of the 2025 Comprehensive Plan Update. We look forward to reviewing further elements of the plan and working with the County to ensure the long-term viability of Skagit agriculture.

Sincerely,

A handwritten signature in blue ink that reads "Kim Good Rubenstein". The signature is written in a cursive, flowing style.

Kim Rubenstein
President, Board of Directors

Skagitonians to Preserve Farmland
PO Box 2405
414A Snoqualmie Street
Mount Vernon, WA 98273



August 21, 2024

Skagit County Planning & Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Comments to Draft Skagit County 2025 Comprehensive Plan Update: Natural Resource Lands

Dear Planning Department:

Thank you for the opportunity to comment on the first draft of revisions released for the Natural Resource Lands element of Skagit County's 2025 Comprehensive Plan Update.

Our comments pertain the proposed revisions to Natural Resource Lands only. We recognize there will be draft revisions released for other elements of the Comprehensive Plan; these latter elements of the plan should not abrogate the protections established in the Natural Resource Lands draft. Comprehensive Plan revisions regarding housing, utilities and climate change, for example, have the potential to significantly impact Natural Resource Lands. The County must, at the end of the day, ensure a seamless and holistic plan that provides strong guidance, across the plan, to protect Skagit's unique agricultural resources.

Agriculture is a productive and vital part of the Skagit Valley economy. Continued viability depends upon protecting a critical mass of farmland, now zoned as Agricultural-Natural Resource Lands, capable of supporting Skagit's uniquely diverse agriculture industry. Thankfully, the County has a long history of public support for farmland protection. In 1996, a survey of registered voters in Skagit County demonstrated support for an increase in property taxes to purchase development rights on farmland, an expression of support that led directly to the creation of the Farmland Legacy Program. Even today, in surveys conducted for the County as part of this Comprehensive Plan Update, farmland preservation tops the list of citizen concerns across demographic bands. This update to the Comprehensive Plan provides an opportunity for Skagit County to further strengthen its protection of farmland by ensuring no further loss of farmland through the de-designation of Ag-NRL zoned lands, the elimination of incompatible uses, and the application of comprehensive and integrated planning with regards to natural resources in the Skagit Valley.

Our specific comments on the proposed changes to the proposed Natural Resource Lands revisions are as follows:

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(e) Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.

Skagitonians supports and strongly encourages the County to adopt a policy of comprehensive analysis when considering de-designation of Ag-NRL. Furthermore, the 2025 Comprehensive Plan Update should clarify that the qualifying criteria listed in Policy 4A-1.1 are intended to provide guidance for *designation only*. (See comments below regarding Policy 4A-3.1)

As the plan is currently written, it is clear that some landowners and developers would choose to interpret the designating criteria of Policy 4A-1.1 as a roadmap to de-designation. For example, a landowner may cease active farming, whether due to economic hardship, personal circumstances or other. This period of inactivity does not in itself then make that property less suitable for Ag-NRL designation, and it should not be used as an argument to abandon Ag-NRL designation.

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Skagitonians appreciates the commitment the County has made to preserving agricultural lands. Given this, it is imperative that the County maintain accurate information about these lands in order measure progress against the goals listed in the Comprehensive Plan. A database as described has the benefit of establishing a solid baseline of information for use in evidence-based decision making.

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Skagit County faces some very complicated challenges regarding land protection, salmon recovery and the continued viability of agriculture. Skagitonians believes the development of an integrated Natural Resources Plan would provide the best means of strategically addressing these concerns and ensuring that resources are deployed effectively. As such, any discussion of Voluntary Stewardship Plans or other conservation measures should occur within the context of an overarching integrated Natural Resources Plan.

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Skagitonians to Preserve farmland does not support language in the Comprehensive Plan that suggests the same criteria used to designate Ag-NRL land should be used for de-designation. This language should be removed and replaced with guidance for a comprehensive analysis that takes into account the commitment Skagit County has made to supporting local agriculture.

The guidance for de-designation listed in Policy 4A-3.1 provides a foundation for a comprehensive analysis, but the County should remove reference in Policy 4A-3.1 that points back to Policy 4A-1.1 as criteria for de-designation. Policy 4A-1.1 provides useful guidance, but a comprehensive analysis regarding potential de-designation should also weigh the full force and efficacy of Agricultural Support Programs identified in Goal 4A-2 before determining that an Ag-NRL designation should be abandoned. The County should first ask itself if more can be done to support farmland, and if acreage is removed from the Ag-NRL, what are the cumulative impacts to the County's agricultural infrastructure and economy?

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As stated above, Skagitonians supports the development of an Integrated Watershed Plan to provide guidance on habitat restoration projects in the context of drainage infrastructure, hydrologic function and agricultural activity. Policy 4A-4.6 should be restated as follows: "Habitat restoration projects are not a permitted use on agricultural lands unless the project is consistent with a County-adopted Integrated Natural Resources Plan."

Thank you for the opportunity to comment on this element of the 2025 Comprehensive Plan Update. We look forward to reviewing further elements of the plan and working with the County to ensure the long-term viability of Skagit agriculture.

Sincerely,

A handwritten signature in cursive script that reads "Kim Good Rubenstein".

Kim Rubenstein
President, Board of Directors

Tara Satushek

From: Jenna Friebel <jfriebel@skagitdidc.org>
Sent: Wednesday, August 21, 2024 1:21 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Planning Department,

The Skagit Drainage and Irrigation Districts Consortium LLC (Consortium) submits the following comments on the Draft Policies to the Comprehensive Plan Appendix B. Natural Resources Lands Preliminary Policy Revisions presented to the Skagit County Planning Commission on July 23, 2024.

Policy A (118)

The Consortium proposes to keep the original language proposed for deletion to ensure special circumstances of Skagit County as it pertains to agriculture are preserved.

Policy 4A-1.1 (118)

The Consortium proposes to delete the proposed addition "(e) Site-specific proposals to de-designate nature resources lands..."

Policy 4A-2.4 (121)

The Consortium requests that the County keep the intention of this section of the Comprehensive Plan and that the County considers moving this language into a new section related to the development and adoption of an Integrated Natural Resources Plan.

It is critical that Skagit County maintain a database that accurately documents conversion of agricultural lands to other uses and also accurately documents conversion of habitat and implementation of habitat enhancement projects. Trade-offs between habitat restoration and farmland preservation need to be documented and monitored to ensure goals for sustainable fisheries and agriculture can be achieved locally.

Policy 4A-2.7 (122)

The Consortium requests that the County consider creating a new policy section for the development of an Integrated Natural Resources Plan. While we agree that it is important to have a watershed group responsible for developing a VSP workplan, this work cannot proceed in absence of an overarching integrated Natural Resources Plan. Currently, funding and implementation of habitat projects are made by a variety of organizations and implemented for a variety of purposes, none of these are coordinated or include an analysis of the cumulative impacts to agricultural land base. These include efforts funding through Skagit Water Council, VSP, Skagit Conservation District, Department of Ecology (Samish Island), and WDFW.

As written, this policy which only focuses on VSP, is too narrow to provided context for overarching goals for fisheries recovery and agricultural preservation. Continued siloed approaches with single-interest goals, particularly those with significant outside funding, will inevitably lead to conflict instead of cooperative solutions.

The Consortium believe voluntary programs are essential to achieving recovery goals and that these goals and associated actions should be developed and implemented through a locally led, integrated natural resources plan.

Policy 4A-2.8 (122)

Similar to the comment on Policy 4A-2.4, the Consortium requests that the County keep the intention of this section of the Comprehensive Plan and that the County considers moving this language into a new section related to the development of an Integrated Natural Resources Plan. It is critical that Skagit County maintain a database that

accurately documents information related to the long-term productive management of natural agricultural resources lands. This includes accurate mapping and classification of drainage district watercourses and high value streams.

Policy 4A-3.1 (123)

The Consortium does not support language in the Comprehensive Plan that suggests the same criteria used to designate Ag-NRL land should be used to de-designation. This language should be removed and replaced with guidance for a comprehensive analysis that takes into account the commitment the Skagit County has made to supporting local agricultural. This will be increasingly important as the County evaluates predicted effects of climate scenarios, such as sea level rise, as part of this process.

The Consortium suggests the following revisions to the existing policy:

“Habitat restoration projects are not a permitted use on agricultural lands unless the project is consistent with a County adopted Integrated Natural Resources Plan”.

Policy 4A-5.5 (125)

The Consortium suggests the following revisions to the existing policy:

“Within the Drainage Districts, identified in the Skagit Drainage and Fish Initiative, the agreements for maintenance, fish protection, and habitat restoration outlined in the Memorandum of Understanding (MOU) will predominate over local regulations. The MOU, signed by each Drainage District and Washington Department of Fish and Wildlife (WDFW) is designed to reduce conflicts, provide regulatory certainty for drainage maintenance activities, and support voluntary habitat restoration actions within signatory Drainage Districts in the Skagit and Samish Deltas.

Thank you for this early opportunity to be involved in the planning process, we recognize that this is will be a long process and we welcome additional opportunities to be involved in this and other key elements of the Comprehensive Plan Update.

Sincerely,

Jenna Friebel

Jenna Friebel, Executive Director

Skagit Drainage and Irrigation Districts Consortium LLC
2017 Continental Place Suite 4
Mount Vernon, WA 98273
360-708-0344



Skagit County Agricultural Advisory Board

1800 Continental Place • Mount Vernon, Washington 98273
office 360-416-1338 • www.skagitcounty.net/planning

8/22/2024

Skagit County Planning and Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Skagit County Planning Department:

The Skagit County Agricultural Advisory Board is writing regarding the 2025 Comprehensive Plan Rural Element and Natural Resource Lands Preliminary Policy Revisions. The agricultural economy is directly tied to the will of residents and the strength of the zoning laws in Skagit County. The Comprehensive Plan has been a very functional part of preserving farmland and agriculture. The draft version of the Rural Element and Natural Resource Lands Element recognizes and maintains these agricultural protections. We ask that any changes to the essential policies guiding rural and natural resource protections continue to support viable agriculture in Skagit County.

Thank you for considering our comments.

Sincerely,

Michael Hughes
Chair, Agricultural Advisory Board

Advisory Board Members:

Michael Hughes (Chair), Kraig Knutzen (Vice Chair), Nels Lagerlund,
Justin Hayton, John Morrison, Steve Omdal, Terry Sapp,
Steve Wright, Michael Trafton, Steve Skrinde, Kim Mower,
Cindy Kleinhuizen, Don McMoran (ex officio)

August 21, 2024

To: Skagit County Planning & Development Services
From: Ellen Bynum, Friends of Skagit County
RE: Comments on the proposed changes to the 2025 Periodic Comprehensive Plan update, Rural Lands and Natural Resource Lands chapters.

Thank you for the opportunity to comment regarding the proposed changes to the 2025 Periodic Skagit County Comprehensive Plan updates concerning Rural Lands and Natural Resource Lands. We will continue to submit comments as we review other parts of the CP. This focuses mainly on the Ag-NRL zone with some general comments about adding citations, reference or footnotes when the policy is used in more than one section.

As we read the proposed changes to the policies we note that the 2016 Periodic update chapters were organized to have the following:

Introduction;

Chapter information and land use designations including supporting information;

GMA mandates and;

Goals and Policies (including characteristics of the chapter topic, and policies applicable to each zoning designation).

Unlike the first comprehensive plan, changes to subsequent periodic updates, including the 2016 CP, include legal appeals decisions, changes to state laws and generally make the plans reflect and uphold the Growth Management Act RCWs. The past revisions involved citizen advisory committees and allowed Skagit County to come into compliance with state laws. With that in mind, we ask that the proposed revisions stay close to the 2016 CP version and do not include unnecessary word-smithing or arbitrary inclusion of proposed changes where the existing language may reflect appeals decisions or other policy changes at local, state and federal levels.

Where some topics may be included in more than one chapter, we do not advise editing to delete repeated language, unless there is a placeholder and note referencing where the language had been included but was being deleted. For most readers it is easier to have more clarification, rather than less.

We prefer the language to reflect the requirement(s) as stated in the RCW. Changing a phrase from "... shall be located" to "Locate" changes the meaning and force of the sentence. The loss of the word "shall" suggests that an action is not required. Removing "shall" also denies the reader the knowledge that a law is behind the activity and the law requires the action. A plan is, after all, subject to evaluation and revision, and the language should be clear as to the permissions and restrictions allowed.

Changing the existing policy to start with an active verb can shift the meaning not only as to who is doing the work, but how the work is being accomplished. If you must lead with an active verb, please continue to include "shall" in a following sentence so that it is not eliminated and the meaning is clear.

Are all of the changes required by E2SHB 1220 and additional bills that passed in 2023-24 included in the proposed changes to the CP?

It appears that E2SHB 1220 and the additional bills that resulted in changes in the RCWs may need to be inserted in a number of sections of the CP; however, we ask that the language suggested in the RCWs be referenced, with the proper Section and other numbers, if the changes are not included in the CP chapters. The amendment process appears to be ongoing at the state level with all of the changes to the RCWs and WACs not being completed until 2025.

Please provide a correct reference to the sections of the RCWs that are new or were changed by E2SHB 1220 and other legislative actions that are prompting the suggested changes to the CP, policies and codes. The Dept. of Commerce, GMA list of bills affecting GMA show the changed bills, not the original language, making it difficult to determine if the Skagit CP needs revising.

For example: Changes to Sec. 1 RCW 36.70A.020 appear as follows:

(4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

Partial changes to Section 2 RCW 36.70A.070 are:

(2) A housing element ensuring the vitality and character of established residential neighborhoods that:

(a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce, including:

- (i) Units for moderate, low, very low, and extremely low-income households; and
- (ii) Emergency housing, emergency shelters, and permanent supportive housing;

(b) Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and within an urban growth area boundary, moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;

(c) Identifies sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes;

(d) Makes adequate provisions for existing and projected needs of all economic segments of the community, including:

- (i) Incorporating consideration for low, very low, extremely low, and moderate-income households;
- (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;
- (iii) Consideration of housing locations in relation to employment location; and
- (iv) Consideration of the role of accessory dwelling units in meeting housing needs;

(e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:

- (i) Zoning that may have a discriminatory effect;
- (ii) Disinvestment; and
- (iii) Infrastructure availability;

(f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;

- (g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
- (h) Establishes anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

In counties and cities subject to the review and evaluation requirements of RCW 36.70A.215, any revision to the housing element shall include consideration of prior review and evaluation reports and any reasonable measures identified. The housing element should link jurisdictional goals with overall county goals to ensure that the housing element goals are met.

The adoption of ordinances, development regulations and amendments to such regulations, and other non-project actions taken by a city that is required or chooses to plan under RCW 36.70A.040 that increase housing capacity, increase housing affordability, and mitigate displacement as required under this subsection (2) and that apply outside of critical areas are not subject to administrative or judicial appeal under chapter 43.21C RCW unless the adoption of such ordinances, development regulations and amendments to such regulations, or other non-project actions has a probable significant adverse impact on fish habitat.

Comments and Suggestions to consider:

Rural Element Chapter.

3A-2. Development Patterns and Densities. "Provide for a variety of residential densities, housing types, including affordable housing, and ... "respect farming and forestry...." . Please revise to "...protect and conserve natural resource lands (farms, forests & minerals) and open spaces" as this is the language and action required under GMA.

3B-1.0. We will provide a separate document with comments on LAMIRDs which include historical staff memos and guidance on the subject. The table would be useful and also additional discussion from the RCW. Code additions needed. Please retain all the stricken language and add explanations or reorder or provide a link or reference to the corresponding RCW. Group the policies that apply to all LAMIRDs into one policy.

3B-1.8. We do not support referencing LAMIRD policies to create new centers.

3C-1.6. Please add that new Rural Villages can only be located in designated rural areas.

NATURAL RESOURCE LANDS

Agriculture - Natural Resource Lands - Ag-NRL4A. Please re-write the information in the stricken sentence to use active verbs as all of these activities are particular to ways that Skagit County has had to "preserve and enhance the ag land base...".

Suggested: Conversion of ag lands to development and inappropriate habitat restoration is not allowed. Mitigate drainage impacts and other conflicts with neighboring residential uses. Prevent disruption of ag lands functions and values like harvest activities, equipment transfer or drainage maintenance.

4A-1.1. (d) may have been in the first comp plan though It may be similar to the new WAC.

4A-2.1 prefer to leave the first part of the sentence as is because the word "shall" is stronger than "ensure" and has a different meaning.

4A-2.2 "Including" in this sentence references that the Conservation Futures Program Advisory Board has more activities to promote the preservation of agricultural land, than just its role in recommending purchases of permanent conservation easements. The rewrite focuses on the "promoting the preservation of ag land for use as farmland". Promotion might never result in conservation easements. Might need an additional para to split out the promotion activities and the active purchase and holding of conservation easements on agriculture. We are not aware currently of "other lands of strategic significance that the CF holds easements on that are not Ag-NRL.

4A-2.3. No change because using an active verb Suggested re-write: Skagit County shall lead and coordinate agricultural policy and farmland protection through the FLP...". The FLP is the only group that does this work. Please leave the second sentence

4A-2.4. Even if VSP accomplishes this, Skagit County would still maintain the database. We recommend leaving this as written as it may have been part of a settlement or legal agreement, or a requirement of funding for a program.

4A-2.6. The changed language suggests that Skagit County will direct the AAB, CFAC and FLP. In fact the structure of the CFAC and FLP puts a citizen governing committee in charge of policies, programs and staff. Take out the word "work" and use "shall formulate, etc."

4A-2.7. Is the VSP work plan completed? If so add language to reflect that and that the program continues with the workgroup or other guidance.

4A-2.8. If Skagit has not developed the clearinghouse, but it is available through other agencies, we need to keep this as a policy as whoever produces the clearinghouse relies on the data collected by other county, NGOs, state and federal programs.

4A-3. Please add "prohibit non-farming uses including non-farm accessory uses on ag lands except where specifically allowed with special use permits or in other codes like for emergency use....".

A4-4. Please add "Only" at the first of the sentence or before "promote agriculture".

4A-4.3. Definition in the Comp Plan: Farm-Based Business

An on-farm commercial enterprise devoted to the direct marketing of unprocessed and/or value-added and soil-dependent agricultural products that are produced, processed, and sold on-site. Farm-based businesses are intended to supplement farm income, improve the efficiency of farming, and provide employment to farm family members. Farm-based businesses are separate and distinct from Agricultural support services (see Agriculture Support Services).

"Accessory uses" on Ag-NRL are required to be soil-dependent ag related activities.

4A-4.5. Special events. Suggested language: Permit special events and activities on ag lands only as allowed. SUP holders must reduce potential impacts from traffic, noise, litter, trespass, sanitation and any other activity that interferes with agricultural lands use. Permit holders are responsible for the

costs of clean-up, restoration or mitigation for damages to adjacent ag lands. (May need code clarification or new section to enforce).

A4-5. Mitigation of conflicts should also be available to ag resource landowners. May need code changes to enforce.

4A-5.2. This is already required and is done for all transactions with this criteria. No changes.

4A-5.3. SCC does not allow Conservation and Reserve Developments (CaRDs) in Ag-NRL. Please rewrite to reflect this by removing "within". Maybe add that CaRDs are not permitted in Ag-NRL.

A4-5.5. Please ask WWAA to review the suggested changes and make any needed additions.

A4-5.6. Public Works may already have criteria to review development proposals for drainage impacts on ag lands.

Tara Satushek

From: Liam Diephuis <lr_diephuis@gmail.com>
Sent: Wednesday, August 21, 2024 4:19 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Good day to all members of the Planning Commission.

My name is Liam Diephuis, and I work in civil engineering in Burlington. After reviewing the Rural Preliminary Policy Revisions, I am glad to see a desire by the Planning Commission to limit urban sprawl. I have a few suggestions for policies that will lead our County more positively down this path.

Don't encourage PUD extension beyond city limits, as this goes against other stated goals by enabling sprawl. In my experience as a water resources engineer, PUD expansion farther beyond city limits will also make the futures of our PUDs more financially precarious, as they attempt to keep up with an ever-increasing maintenance backlog.

Consider a policy that prohibits the expansion of LAMIRDs and areas zoned Rural Intermediate and Rural Village. This is consistent with the stated goals of those designations as preserving what development is already there.

Consider a policy that mandates transit service by Skagit Transit for LAMIRDs and areas zoned Rural Village.

Thank you,
-Liam

Tara Satushek

From: Molly Doran <mollyd@skagitlandtrust.org>
Sent: Wednesday, August 21, 2024 4:46 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Skagit Land Trust Comments on Initial Drafts Rural and Natural Resource Lands Preliminary Policy Revisions Submitted 8/21/2024

Thank you for the opportunity to comment on preliminary policy revisions to the Skagit County Comprehensive Plan Rural Element and Natural Resource Lands Element.

We understand that this initial round of policy amendments is primarily intended to streamline policies, add active verbs, and amend policies to reflect updated state law. There will be another opportunity to comment on the full draft of the proposed Comprehensive Plan update later in the process.

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 400 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 48 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.

Following are proposed policy revisions to the Rural and Natural Resources Lands Element that we support.

Appendix A, Rural Element Preliminary Policy Revisions

The following two statements are included on p. 12 of Appendix A. The implication is that these are proposed new policy language although that is not entirely clear. They appear to be related to HB 1220 and its directives to increase affordable housing and to encourage "middle housing types" specifically in Urban Growth Areas; and to SB 5275, which allows more options for development and redevelopment inside a LAMIRD boundary provided sufficient public services and facilities are available.

"Expand the type of housing units allowed in LAMIRDs where public facilities and services provide sufficient capacity, to include middle housing types such as townhouses, triplexes, and fourplexes and manufactured and park model homes."

"Consider a demonstration program within LAMIRDs to encourage and incentivize more affordable housing types, where it can be demonstrated that public facilities and services provide sufficient capacity."

Skagit Land Trust strongly supports efforts to increase affordable housing in Skagit County. The primary method for doing so should be to encourage growth in cities and towns, by making them highly livable, walkable, and desirable places to live, and by partnering with non-profit housing organizations and the private sector to offer a wide variety of affordable housing options. The Trust also supports amending the Countywide Planning Policies (CPPs) to encourage 90 percent of new residential growth to occur in the cities and their UGAs, rather than the current goal of 80 percent.

We do not believe the County should be looking at ways to increase development potential in the rural area, even if these increases are limited to Rural Villages and Rural Intermediate areas. The County and cities do not consistently achieve the CPP goal of 80 percent of new growth occurring in urban areas; increasing rural development potential would move us further from that goal.

Furthermore, with climate change, many of the factors that used to dictate density must be updated with greater emphasis placed on natural hazards and limited resources. Thus, things such as water supply, single source aquifers, flood plain hazards, sea level rise, forest fire hazards, erosion, landslides, and transportation routes in floodplains all need to be considered.

Appendix B, Natural Resource Lands Preliminary Policy Revisions

Natural Resource Land De-Designation Requests

We support policy language you are proposing to add to the Ag-NRL and Forest-NRL designation criteria, that “site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.”

Site-specific de-designation requests are often submitted simply because the landowner seeks to gain additional development potential on their land, regardless of whether their parcel meets the Natural Resource Land designation criteria. It is very difficult and time-consuming for planners to consider such isolated de-designation requests separate from a more comprehensive review of the natural resource land base. On rare occasions a parcel may have been incorrectly designated as Natural Resource Land, but this should only be evaluated on a comprehensive basis when looking at the agricultural or forest land base as a whole.

Wildland Urban Interface

The Trust supports the following proposed new policy language on p. 57 or 91:

“New: Develop and apply Wildland Urban Interface regulations. Consider the potential risk of wildland fires when establishing rural densities as well as when considering urban growth area expansions into areas where structures and other development intermingles with undeveloped wildland or vegetative fuels.”

Warmer summers and changing rain and snowfall patterns mean westside forests will be increasingly subject to forest fire risk. To reduce these risks and protect our forests, which provide a tremendous range of ecosystem services, the County should be very cautious about allowing any additional development in forest lands.

Recommended new policies

The Trust recommends the following additional policies be added to the Natural Resources Lands Element, as we indicated in an earlier separate communication. Natural ecosystems are all of a piece. They work together to regulate our climate, lock away carbon, clean and store the water we drink, provide adequate habitat for native fish and wildlife to adapt, slow and alleviate flooding, control storm water and filter pollutants, create natural beaches protecting communities, help deter invasive species, protect biodiversity, and allow people from all communities to connect with nature in healthy, low carbon ways. Natural resource lands must not just be viewed from the perspective of commodity production, but also for the critical roles they play as part of the green infrastructure network that provides life-sustaining benefits to us all.

Promoting Carbon Storage

- Develop systems to preserve our forests, wetlands, water and soils for natural carbon storage as a way to reduce carbon emissions in the County.
 - Identify carbon sequestration as a compatible forestry practice for Open Space taxation.

- Allow increased carbon storage (bio-char, etc.), including through mitigation programs, as compatible agricultural land uses for Open Space taxation.
- Adopt strict critical area code for science-based buffer widths to protect and restore healthy freshwater and coastal wetlands in all land use areas. These store more carbon per acre than any other habitat on earth. They also buffer communities from sea level rise, flooding, and fire.

Elevate Natural Resource Conservation

- In the comprehensive plan chapters on Land Use, Natural Resources, and Environment, elevate natural resource conservation for all types of land.
 - Prioritize and adapt to climate change including sea level rise by conserving lands that mitigate climate change while helping provide clean water, unpolluted air, the ability for communities to adapt to changing conditions, and places for fish and wildlife to adapt.

Thank you for the opportunity to comment on these preliminary policy proposals. We look forward to continuing to engage in the process as the Comprehensive Plan update moves forward.

Sincerely,



Molly Doran, Executive Director
Skagit Land Trust
10202 S 3rd Street
Mount Vernon WA 98273

Tara Satushek

From: Kara Rowe <kara@westag.org>
Sent: Thursday, August 22, 2024 2:44 PM
To: PDS comments
Cc: Jenn Smith; Owen Peth
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies Comments

Planning Commissioners and staff,

Thank you for the opportunity to comment on the proposed changes to the County's Comprehensive Plan, specifically the Rural Elements and Natural Resources section. As a representative of the area's agricultural community, we appreciate the time taken to make the plan more efficient. We also understand that things can often get diluted unintentionally during the process. Because of this, overall we oppose the suggested changes in the Agriculture portions, because we feel the proposed changes could lead to diluted protections for agriculture. We also oppose any changes to the LAMIRDs portions in the Rural Element section that could, again, lead to diluted protections for agriculture.

Thank you for your time, and we look forward to commenting on future sections of the Comprehensive Plan Draft.

Respectfully,
Kara

Kara Rowe

Policy Director
Western Washington Agricultural Association
www.westag.org



Tara Satushek

From: Aaron Weinberg <Aaron@skagit.org>
Sent: Thursday, August 22, 2024 4:10 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Hello,

I am submitting comments on behalf of the Economic Development Alliance of Skagit County and CEO John Sternlicht for the Natural Resource Lands Preliminary Policy Revision and the Rural Element Preliminary Policy Revisions.

Here are our comments:

4A: Does this use of the important phrase “long-term commercial significance” mean what is currently of commercial significance and has been for some time? Does that mean if land has not been farmed for commercial use in some time, the designation may no longer be appropriate? How would that land be designated? Could it be developed?

4A-1: We are looking at, “The County may also consider unique farmland soils and farmlands of statewide importance.” How is that determined? Are “Unique” and “of statewide importance” adequately defined in the WAC 365-190-050? Per the previous comment, is this the “comprehensive countywide analysis” that is required to de-designate NRL? (The same applies to forestry and mining).

3B-1.1 on LAMIRDs under item IV: “...in a manner that does not permit *or encourage* low-density sprawl.” (Suggestion added in blue).

3C-2.6 Would there be more than one district in each rural village?

3C-11.3 The square footage listed in the existing policy does not seem like enough outside and inside area for a viable business.

Aaron Weinberg

Economic Development Manager – Special Projects

Economic Development Alliance of Skagit County

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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.

