



# Planning & Development Services

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## Public Comments on Preliminary Amendments to Economic Development Element

Count	Last Name	First Name	Organization/ Address	Comment Method	Date Received
1	Day	Angela	Planning Commission	Email	08/20/2024
2	D'Avignon	Jason	Skagit Prosecutting Attorney	Email	08/26/2024
3	Mu	Xuhua		Email	09/12/2024
4	Good Rubenstein	Kim	Skagitonians to Preserve Farmland	Email	09/18/2024
5	Weinberg	Aaron	EDASC	Email	09/19/2024
6	Priest	Galen	Swinomish Indian Tribal Community	Email/Letter	09/24/2024

Angela Day Comments  
Planning Commission Meeting August 20, 2024

## **Housing Element**

Policy 7A-1 and first new proposed policy under housing affordability for all income levels

Based on Director Moore's comments at the July 13 meeting, perhaps this language needs further revision as the county may not be able to provide for the lowest AMI housing types which are better suited to urban areas.

Housing Affordability – 3<sup>rd</sup> new proposed policy

Promote homeownership through various programs such as education, technical support, self-help housing efforts, and working with financial institutions.

Question: How would this policy be funded and implemented?

2<sup>nd</sup> Question: Could this include promoting cooperative ownership of manufactured housing lots?

New Goal and Policy

Prevent discrimination, address displacement, and mitigate past harm in the development and maintenance of housing.

Question: How might this policy be implemented? What types of land use regulations would flow from this policy?

## **Land Use Element**

General Question: The term patterns of development is used in new policy language in both the land use and housing elements. How is this term defined and how might it be implemented in code language?

2A-7

Allow residential development within **unincorporated** Urban Growth Areas at rural densities prior to the provision of urban infrastructure, provided that future development at urban densities is not precluded.

Question: Would allowing development within UGAs at urban densities help address housing availability? Once land is developed at rural densities, it may be more difficult to increase densities once annexed.

Also, this language in 2A-7 seems to conflict with Policy 2A-8.2 which may allow development at urban densities in cooperation with towns and cities.

### **Economic Development**

Overall comment – the proposed changes in this section are excellent in my view. Support for resource based industries and those that complement those industries and quality of life in Skagit County are very thoughtful and clearly conveyed in these proposed changes.

Proposed new policy

**Continue to identify barriers for small businesses in land use regulations and establish strategies to mitigate or remove barriers.**

This is a welcome policy! Not sure how it will be implemented, but it seems important in order for small businesses to compete with mid- and large-scale businesses.

## Tara Satushek

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**From:** Jason D`Avignon  
**Sent:** Monday, August 26, 2024 9:59 AM  
**To:** Robby Eckroth  
**Subject:** economic development language for comp pan

The Comprehensive Plan should be amended to capture all public facilities contained in the plan, in the economic development section. I would suggest adding the following language on page 323:

Policy 11G-4.7 Expend funds collected under Chapter 82.14 RCW to finance public facilities serving economic development purposes and finance personnel in economic development offices. For purposes of this Policy any public facility, as defined in RCW 82.14.370(3)(c)(i), listed in this Comprehensive Plan (including subarea plans) is fully incorporated to this Economic Development Section.

Jason D`Avignon  
Civil Deputy Prosecuting Attorney  
Skagit County Prosecutor's Office  
T|360.416.1600 x1638  
[jasond@co.skagit.wa.us](mailto:jasond@co.skagit.wa.us)

**From:** xuhua.mu2@gmail.com  
**Sent:** Thursday, September 12, 2024 4:01 PM  
**To:** PDS comments  
**Subject:** Skagit County's 2025 Comprehensive Plan Draft Policies - PUBLIC COMMENT

**Section 1 - Economic Development Policy Revisions**

1. **Policy Requirement to provide new and expand infrastructure.** Proposed policy changes indicate that local and regional entities should provide for the required new infrastructure that supports the economic growth and natural resources industries. Who is going to pay for providing this expanded infrastructure, the tax payers, developers, city, County, State and/or Federal resources? Interesting that the previous Comprehensive Plan expected that lands would be designated for industrial use that already had ready access to needed infrastructure (see below).

*“Locate lands designated for industrial use where they will have ready access to appropriate infrastructure, environmental constraints will be minimized, and permitting can be expedited.”*

So if a region or city cannot afford the cost of new or expanded infrastructure to provide for new economic development, what are the consequences?

**Please provide clarification who is going to pay for these new and expanded infrastructures and what are the consequences of no action due to lack of affordability.**

2. **Increased County Influence on Local/Regional Economic development:** It is quite clear by the revisions to the policy wording on several items in the Updated Comprehensive Plan, that the County expects to play a stronger role in influencing local decisions regarding Economic Development. Several policy changes to the original Comprehensive Plan strike out words such as “Encourage” and then are replaced with words such as “Collaborate”, “Work with” and “evaluate”. Fortunately the County has supported the recent regional/local push back on economic development such as the Lithium storage site proposed by the State. But what is the process of resolving future disagreements between the County, State and Regions/City/Local entities on economic development?

**Please provide clarification as to how disagreements on economic development between local, county, state entities will be resolved.**

3. **New Quality of Life Policy Eliminates consideration of Open Space:**

A revised policy in the Comprehensive Plan Update includes the following:

*“Encourage economic development that supports all aspects of quality of life including living wage, education, human services, housing and transportation”.*

However the old policy clearly included Open Space as a key quality of life considerations as follows:

*“Encourage economic development that supports sustainable natural resource industry, protects valued open space and environmental quality and enhances Skagit County’s overall quality of life.”*

So sounds as if the updated Comprehensive Plan no longer cares about protecting valued open space and environmental quality that enhances Skagit County's overall quality of life.

**I request Protecting valued open space and environmental quality be inserted back into this policy.**

Detailed comments for Economic Development Policy Section

Existing Goal #	Existing Policy #	Theme	First Draft Policy Proposal	
New Goal		Economic Growth and Land Use	Establish a land use framework in Skagit County that supports diverse businesses, enhances natural resource industries	Since this is our new priority state our natural resource enhance! Is that agricultural other? Mainly because <i>encourage a mix of diverse that complement and support industries.</i> " And then the policy to "identify strategic industries such as construction manufacturing, clean technology care". So why can't we natural resource industries that support natural resource
	New Policy	Economic Growth and Land Use	Work with the cities to align comprehensive plans and future economic development opportunities through zoning and development regulations.	Implies that the County role in dictating the economic regional/city actions.
	New Policy	Economic Growth and Land Use	Work with SCOG to align the County economic growth actions with regional actions and routinely participate to evaluate this relationship	
11B-3		Economic Growth and Land Use	Coordinate with the cities to identify sufficient sites for human and social services, and improved access to those services, to meet the needs of Skagit County employees and employers.	Previous wording stated replaced with "Coordinate This can be easily interpreted intends to take a much rural and city decisions. So we whereby the County and agreed on zoning change County Comprehensive storage project and win process of resolving the disagreements?
			Continue to identify barriers for small businesses in land use regulations and establish strategies to mitigate or remove barriers.	Clearly being more flexible intended with this policy rural, commercial, housing have in place. Interest in Farm Legacy Program and future Economic Development
			Encourage a mix of diverse non-resource-based industries that complement and enhance resource-based industries as a major part of Skagit County's economy.	
			Work with jurisdictions and agencies to identify appropriate areas for increased business diversity and explore options for implementation.	
			Work with SCOG, jurisdictions, and	

## Section 2 – Housing Preliminary Revisions

1. **Policy revision to ensure diverse housing types to keep up with the population projection for all income groups.** Skagit County published “Skagit County Population, Housing and Employment Growth Allocations Methodology” (Methodology) on December 12, 2023 to forecast population growth and housing demand by average medium income (AMI) by “urban growth area” (UGA) and “rural area”. The methodology appears to be flawed and lacking facts and data to support its housing demand forecast by income groups.
  - a. The population growth projection is based on long term historical population growth rate. However, based on the actual population data<sup>1</sup>, birth rates and death rates in Skagit County from 2011 to 2022, 85% of the population growth in Skagit county was driven by net migration and the trend is going up. Foreign born population as % of total US population reached its RECORD HIGH at 15.6% or 51.6 million in March 2024. Since net migration contributes to the vast majority for the population growth in Skagit county, the characteristics of the future migrants (2025-2045) have to match those from the past for the projection on population, income levels and housing by AMI)to work! Skagit county needs to provide facts and data to help the public understand the demographics of the future migrants moving to Skagit county. What type of jobs and incomes would they have? Age distribution? Family size? Education level?
  - b. Another assumption in the “Methodology” is that existing houses in the county will not enter the supply and demand in the housing market. If the owner(s) of a house died, the property is likely to be on the market. The death rate was 9.6 (deaths per ‘000 population) or 1174 per year from 2011 to 2019. The death rate increased to 11.2 (deaths per ‘000 population) or 1459 per year from 2020 to 2022. What happens to the residential units after the owners passed away? What happens to the homes when owners and family relocate out of the area for jobs?
  - c. Skagit county artificially removed 90% of housing demand (1314 units, likely to be multifamily housing) for lower than 50% AMI in rural area and increased same number of housing unit demand (1314 units, likely to be single family housing) to 120%+ AMI across all UGA and rural area. Where would the people with less than 50% AMI in the rural area live since their housing needs are being eliminated? Why do we want to potentially build against an inflated housing demand for 120%+ AMI?

**Please provide answers to above questions and supply the public with facts and data to back up your assumption in the population growth and housing demand forecast. I disagree that you artificially increase the housing demand in urban growth areas. For Anacortes where I live, the artificial increase is 11% more houses.**

2. **Housing Affordability – Plan to produce opportunities for a full range of housing affordability county wide for at all income groups through a progressive program of financial, regulatory and development measures.** The public needs to understand how we are to FINANCE housing for ALL.
  - a. What are the income groups and the number of people in each group that would qualify for the various types of subsidized housing units?
  - b. What are the estimated funding requirements for each subsidized unit by housing type?
  - c. What are the amount of funding by source for all subsidized housing in Skagit county?
  - d. When introducing new types of housing to well developed neighborhoods, public opinions must be considered at the design phase.



- e. Incentives have been offered to developers and builders for a variety of affordable housing types. What measures in place to ensure those incentives translate to affordable prices to targeted income bands rather than increased profit margin for builders and developers? For example, the cottages in Anacortes are on 37th and Commercial are priced at \$629K or \$604 per sq ft (listed on Zillow). A newly constructed single family house on West 3rd St. in Anacortes was sold at \$1,292K or \$470 per sq ft. Is \$604/sq ft affordable?

**Please provide answers to the above questions so we understand how this policy revision's funding. In addition, there are measures in place so any policy revision does not result in higher prices for the home buyers and increased profit for the builders and developers.**

**3. Housing Quality – Strive to preserve, conserve, and enhance the existing housing stock, including historic structures and sites; develop clear and objective design guidelines and standards to improve the quality of new housing consistent with applicable building codes.**

- a. Housing quality is a function of architectural and structural design for the environment and load requirements, quality of building materials and craftsmanship of construction and installation. To assess quality, all components have to be well defined and measurable.
- b. Who from the county or city would be assessing the new housing “quality”? what happens if the quality of the new housing is deemed as “substandard”?

**Please provide measurable and enforceable measures for this policy revision so the public understands the definition of “quality”, how it is “evaluated” and “enforced”.**

**4. Farmworker Housing – Recognize farmworker housing would occur primarily in urban areas where services are available and secondarily in rural areas when sensitively designed to minimize loss of agricultural lands of long-term commercial significance.**

- a. In 1965, Skagit county developed the following guiding principles for its first Comprehensive Plan, which still hold true today!
  - i. Set the stage for farmland preservation.
  - ii. Identified logical areas for industrial and residential uses.
  - iii. Called for avoiding development in areas sensitive to or suffering from pollution.
  - iv. Introduced the County’s first zoning and subdivision regulations.
- b. To set the stage for farmland preservation, our policy should be crystal clear and have no room to lose agricultural land to housing development and other commercial use.

**We request that farmland be protected and housing development is limited to urban growth areas.**

**5. Allow manufactured housing in the same locations and at the same density as other housing. Apply development and design standards in each residential zoning district equally to manufactured homes as they would apply in other residences. Prevent discrimination, address displacement, and mitigate past harm in the development and maintenance of housing.**

- a. There are three distinctive segments in Manufactured Housing. **Skagit county needs to provide clear definition on the type of manufactured housing in the policy.**
  - I. Modular – factory built components, assembled at job site with permanent foundation. It uses same building codes as a site built home. There are a handful of high quality and reputable

modular builders in the US and Canada. Modular homes are being treated the same as single family homes and it should be allowed in single family zones.

- II. Mobile homes – factory built single wide, double wide homes. The manufacturers build mobile homes according to HUD code, which is different to site built homes. Unlike the site built homes, the interior walls of mobile homes are not load bearing. Additionally, the attachment to foundation includes both permanent and non-permanent types. To obtain financing, permanent foundation is normally required. Even with a permanent foundation, mobile home can not achieve the same structural integrity and performance as a site built homes. They are vulnerable under strong lateral loads (wind or earthquake) and susceptible to water damage.
- III. Campers – factory built unit, transportable and can be parked on hard surface. This type of dwellings can only be registered as a vehicle. **We oppose that campers be allowed in residential zones.**

- b. Mobile home is a type of affordable housing because it is built to a different code and is normally set up in a mobile home park with affordable rent. Now let us look at putting a mobile home on a residential lot. Average single family residential lot costs \$80K in the US. A realtor in Anacortes have lots suitable for setting up mobile homes with good soil drainage and relatively flat surface. However, the price tag is at least \$250K per lot. With covid surcharge a small single wide is at least \$50K or more. Shipping, site preparation and setting up cost is another \$20K. This would cost \$150K to put a small single wide on a residential lot that costs the US average. A lot rental at a mobile home park is about \$300-\$1300/month in the US. The bottom line is what is truly affordable for the mobile home owners?
- c. Property values of site built homes next to mobile homes are likely to decline.
- d. This new policy is to provide affordable housing solutions to burdened income groups. It is an economic issue rather than political one. Often times, personal loans are the only option for mobile home buyers. Government’s assistance to find ways to reduce the interest on financing, would be very helpful. Additionally, investors have been purchasing mobile home parks and hiking up the rents since 2020 across the country. The most complaints to WA Attorney General’s office this year is rent increase at mobile home parks. Government policy should look into limiting investors’ market share in housing and mobile home park markets, especially institutional investors. Otherwise, “affordable housing” will be a losing battle!

**County needs to demonstrate financial analysis that demonstrates the economic benefits of placing mobile homes in traditional single family residential zones vs. mobile home parks. Because of mobile homes’ structural vulnerability against lateral loads and susceptibility to water damage in wet condition, there should be consideration to avoid placing mobile homes in flood zones, areas without good soil drainage and seismic fault lines. Additionally, public opinions should be included when permitting mobile homes in developed residential zones. Additional work needs to be done at state legislatures to look into investors’ share in mobile home parks and residential housing market. When housing and land space become a tool in Wall Street for return on capital, the public lose.**

Note

1. Data source: US Census Bureau, USpopulation.org, WA Department of Health, USAfacts.org, Federal Reserve and Center for Immigration Studies

Detailed comments for Housing Section

Existing Goal #	Existing Policy #	Theme	First Draft Policy Proposal	
7A	7A-1	Housing Affordability	Maintain a progressive program of financial, regulatory, and development measures that will produce opportunities for a full range of housing affordability countywide for all income groups.	What are the current funding type and income group? Are we meeting the demand? If not, what are the funding requirements forecasted in the 2025-2040 for each income group? Sources of funding?
	7A-1.8	Housing Affordability	Develop growth strategies and housing and human service programs to plan for affordable housing within the regional context. In collaboration with the cities and housing providers, address the countywide need for ownership and rental housing affordable to households with moderate, low and very-low incomes. Work towards a common goal of having 40 percent of the allocating adequate countywide housing stock according to the regional allocation, affordable at or below 80 percent of the area median income (AMI), with an intentional focus on expanding the supply of housing affordable at or below 50 percent of the AMI.	
	7A-1.1	Housing Affordability	Work with housing producers and stakeholders in urban and rural areas to apply creative solutions to infill and development using techniques and housing options such as attached dwelling units, co-housing, home-sharing, accessory dwelling units, tiny homes, clustering, planned unit developments, and lot size averaging, and middle housing, consistent with the community's vision for urban growth areas and rural character.	Public inputs should be sought for housing types in mature or well developed areas. Proper stormwater drainage should be ensured.
	7A-1.3	Housing Affordability	Explore options, collaboratively with cities and other organizations, for incentives to construct a variety of housing types that are affordable to targeted income bands.	The cottages in Anacortes at West 3rd St. was sold at \$1,629K, over \$600 per sq ft. Builders and developers are targeting certain income bands. Check if the incentives are merely in the hands of developers.
7B		Housing Quality	Strive to preserve, conserve, and enhance the existing housing stock, including historic structures and sites; develop clear and objective design guidelines and standards to improve the quality of new housing consistent with applicable building codes.	How does the quality of the existing housing stock in the same rural area compare to "housing quality" and how would we evaluate the new quality standard, what happens if it's not met?
7C		Housing Distribution and Accessibility	Strive to ensure that a variety of housing types, densities, and values can be produced in the rural area, Urban Growth Areas, and rural villages, and LAMIRDs appropriate to the character of the individual communities. Additionally, ensure sufficient infrastructure capacity is available to accommodate growth and provide housing opportunities for all economic segments of the population.	When mixing housing types and community amenities, it is important to incorporate into the design safety and quality of life for reduced lot size, how about community amenities, such as parks, open space, recreational facilities, and community centers?
	7C-1.2	Housing Distribution and Accessibility	Allow reduced minimum lot sizes in exchange for community facilities and amenities such as parks, open space, recreational facilities, and community centers.	
		Housing Distribution and Accessibility	Allow a variety of housing types including middle housing and affordable housing options in the UGAs and LAMIRDs (for example, ADUs, tiny homes per building code, manufactured homes, duplexes, triplexes, townhouses) where public services are or can be made available to address the changing housing needs.	

### **Section 3 – Land Use Preliminary Revisions**

For land use, most of the revisions are fine. However, we want to limit housing in urban growth area not rural.

Detailed comments for land use Section

Existing Goal #	Existing Policy #	Theme	First Draft Policy Proposal
2A-1	2A-1.1	Development Environmental Preservation	Work with local jurisdictions to designate and maintain Urban Growth Areas (UGAs) of sufficient size to accommodate the County's 20-year urban population and employment allocations. Areas proposed for UGA designation shall meet the following criteria: (a) Compact development can be accomplished through infill or expansion, while minimizing the fiscal and environmental impacts of growth and assuring opportunities for housing, job and commerce. (b) A range of governmental facilities and services presently exists or can be economically and efficiently provided at urban levels of service in a timely manner. These services include sewer, water, storm drainage, transportation improvements, fire and law enforcement protection, and park and recreation. (c) The area has a physical identity or social connection to an existing urban environment. (d) Natural features and land characteristics are capable of supporting urban development without significant environmental degradation. (e) The land does not have long-term, commercially significant value for agriculture, forestry, or mineral production and that can accommodate additional development without conflicting with activities on nearby natural resource lands. (e) The area includes identified patterns of development and likely future development pressure that needs to be addressed according to RCW 36.70A.130.
	2A-1.2	Development Economical Urban Growth Areas	Proposals for Urban Growth Area expansions shall be evaluated for their consistency with the Urban Growth Area Modification Criteria developed and approved by the Growth Management Act Steering Committee. These criteria address issues including: land capacity analysis; ability to provide urban services, <b>patterns of development</b> , impacts on critical areas, natural resource lands, and hazard areas; and compliance with related Countywide Planning Policies. Urban Growth Area expansion proposals shall demonstrate that expansion is necessary within the 20-year planning period, that public facilities and services can be provided concurrent with development, and that reasonable efforts have been made to encourage infill and redevelopment within existing Urban Growth Area boundaries before those boundaries can be expanded.
	2A-1.4	Urban Growth Areas	The following Urban Growth Areas are designated within Skagit County: <b>Non-Municipal UGAs:</b> Bayview Ridge, Swinomish. <b>Municipal UGAs:</b> Anacortes, Burlington, Concrete, Hamilton, LaConner, Lyman, Mount Vernon, Sedro-Woolley
	2A-1.5	Urban Growth Areas Housing	Overall residential densities within Urban Growth Areas shall be a minimum of four (4) dwelling units per net acre, when urban services are provided. <b>"Net density" is what results when only the area of the residential lot is counted, not roads, open spaces, drainage facilities, or other site u</b>

Please feel free to contact me should you have questions. Thank you for your hard work on the county's comprehensive plan!

Sincerely,

Xuhua Mu  
3817 W 11<sup>th</sup> ST  
Anacortes, WA 98221

## Tara Satushek

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**From:** Elizabeth Lunney <interimdirector@skagitonians.org>  
**Sent:** Wednesday, September 18, 2024 10:08 PM  
**To:** PDS comments  
**Subject:** Skagit County's 2025 Comprehensive Plan Draft Policies

September 18, 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 second tranche of Comprehensive Plan: Housing, Land Use and Economic Development. These comments are submitted on behalf of Skagitonians to Preserve Farmland.

Our comments pertain the proposed revisions as they might impact Agricultural Natural Resource Lands and the related agriculture economy. They should be taken in context regarding Comp Plan guidance regarding Ag-NRL lands and other related policies. 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 policy revisions are as follows:

### **Housing Element Preliminary Policy Revisions**

7C – 1.2 Allow reduced minimum lot sizes, OUTSIDE OF THE AG-NRL, in exchange for community facilities and amenities such as parks, open space, recreational facilities, and community centers.

Skagitonians does not object to the reduction of minimum lot sizes OUTSIDE of Agricultural-Natural Resource Lands. This policy is reasonable where density may be desirable to meet affordability, walkability, or other community needs. However, this policy should be clarified to exclude the Ag-NRL, where 40-acre lots sizes have been instrumental in the preservation of viable, working farmland.

7E – 1.1 Work in partnership with other public agencies and the private sector to ensure an adequate supply of farmworker housing. . . Recognize farmworker housing would occur primarily in urban areas where services are available

and secondarily in rural areas when sensitively designed to minimize loss of agricultural lands of long-term commercial significance. . . .

Skagitonians supports this amendment. The right solution to a lack of appropriate zoning and density in UGAs to support farmworker housing in urban areas is to change zoning to better meet the needs of farmworkers in existing urban areas. Using farmland to meet current needs for farmwork housing undermines the agricultural economy these workers—and the county--depend upon.

### **Land Use Preliminary Policy Revisions**

2A-8.3 Maintain zoning maps for each of the Urban Growth Areas showing the zoning of all lands within the unincorporated portions of the Urban Growth Areas.

Skagitonians supports the County maintaining accurate and publicly available records of its zoning and land use plans. We do not understand how the elimination of this policy would support transparency and evidence-based decision making.

2G-1.1 Allow the separation of an existing house from the larger parcel where it is located on lands designated Agricultural-Natural Resource Land and Rural Resource-Natural Resource Land in order to encourage long-term protection of agricultural land. Establish conservation easement on the separated resource land in perpetuity.

Skagitonians supports the addition of language here that might encourage protection of agricultural land. However, as currently phrased, the addition is toothless. Skagit County’s Farmland Legacy Program provides a vehicle for establishing conservation easements on such land to protect them in perpetuity. This policy should be rephrased to be establish a conditional relationship: “Allow the separation of an existing house from the larger parcel. . . .*where a conservation easement has been established on the separated resource land to protect it in perpetuity.*”

SPF proposed revision: “On lands designated Agricultural-Natural Resource Land and Rural Resource-Natural Resource Land, allow the separation of an existing house from the larger parcel where it is located when a conservation easement has been established on the separated resource land to protect it in perpetuity.”

### **Economic Development Preliminary Policy Revisions**

[New Goal] Establish a land use framework in Skagit County that supports diverse businesses, enhances natural resource industries

As this policy is written, it is impossible to determine, at face value, whether this goal seeks to expand businesses independent of existing natural resource industries, thus proclaiming a “best of both worlds” ambition that often results in the sacrifice of one over the other. Skagitonians would support a policy that explicitly calls for the development infrastructure and processing support for natural resource industries that does not detract or diminish existing natural resource industries.

SPF proposed revision: “Establish a land use framework in Skagit County that supports natural resource industries, enhances diverse businesses, and does not detract or diminish existing natural resource industries.”

[New Policy] Work with the cities to align comprehensive plans and future economic development opportunities through zoning and development regulations.

Again, this goal is vague and indeterminate. What new guidance does it provide? The reasoning provided in the draft provides more insight: “The County should continue to work with cities to find a balance between the rural natural resource lands and urban lands. As these lands provide support to one another.” This language should be folded into the policy and strengthened.



SPF proposed revision: “Work with the cities to align comprehensive plans and future economic development opportunities through zoning and development regulations that support natural resource industries.”

11-A. Encourage a mix of diverse non-resource-based industries that complement and enhance resource-based industries as a major part of Skagit County’s economy.

Previously, this goal was written to include only resource-based economies. Skagitonians does not object to the development of non-resourced based industries, but the new goals cited above, with their direct reference to zoning and regulations, give us great pause. It is not enough to stipulate that non-resourced-based industries should “complement and enhance resource-based industries.” Any non-resource-based industry should not impinge, in any way, on the resource lands and related industry of Skagit County.

SPF proposed revision: “Encourage a mix of diverse non-resource-based industries that complement and enhance resource-based industries as a major part of Skagit County’s economy without impinging upon or diminishing the resource lands and related industry of Skagit County.”

Thank you for the opportunity to comment on these elements 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,  
Kim Good Rubenstein  
President, Board of Directors  
Skagitonians to Preserve Farmland  
414A Snoqualmie Street  
Mount Vernon, WA 98273

## Tara Satushek

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**From:** Aaron Weinberg <Aaron@skagit.org>  
**Sent:** Thursday, September 19, 2024 1:00 PM  
**To:** PDS comments  
**Subject:** Economic Development feedback

Hello,

I'd like to present minor feedback on the Economic Development element. For 11A-1, would it make sense to call out EDASC (as the Associate Development Organization) where SCOG is called out?

### ***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](http://www.skagit.org)

email: [aaron@skagit.org](mailto: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.***





Main Office: 360.466.3163

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# Swinomish Indian Tribal Community

A Federally Recognized Indian Tribe Organized Pursuant to 25 U.S.C. § 476  
\* 11404 Moorage Way \* La Conner, Washington 98257 \*

To Whom it May Concern:

Thank you for the opportunity to submit comments on the proposed draft of the Land Use, Housing, and Economic Development sections of the Skagit County Comprehensive Plan. Please consider the below comments on the draft goals and policies:

Policy 2A-4.1, pages 47-48: We encourage UGA revisions to include tribal input as is outlined in RCW 36.70A.110 and the MOA provided for in RCW 36.70A.040(8)

Policy 2A-8.3, page 50: Why is the requirement for maintaining zoning maps showing all lands within unincorporated portions being removed? It would increase transparency and clarity to have such maps available.

Policy 2B-1.1, page 51: There is a word missing after “environmentally sensitive.” This should be corrected for clarity.

Policy 2G-1.1, page 55: Conservation easements placed on agricultural land should not preclude future opportunities for habitat restoration. There should also be allowance for conservation easements on land divisions for the purpose of habitat protection, not just for conservation of agricultural land.

Policy 2H-1.8, page 59: After the words “Provide meaningful opportunities for affected communities” we recommend adding “including tribal communities.”

New policy under goal 11B-3 “Continue to identify barriers for small business in land use regulations and establish strategies to mitigate or remove barriers:” This policy should not allow for removal of environmental protections or easements. Even small businesses need to mitigate environmental impacts. They should not be afforded variances.

Goal 11E, page 320: The words “protects valued open space and environmental quality” should not be removed from this goal. Open space and environmental quality are tantamount to quality of life. Economic development must continue to support these aspects.

Please feel free to contact me for any questions or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Galen Priest". The signature is fluid and cursive, with the first name "Galen" and last name "Priest" clearly distinguishable.

Galen Priest

Environmental Policy Analyst

Swinomish Indian Tribal Community

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