



Planning & Development Services

1800 Continental Place ▪ Mount Vernon, Washington 98273
office 360-416-1320 ▪ pds@co.skagit.wa.us ▪ www.skagitcounty.net/planning

Public Comments on Preliminary Amendments to Land Use Element

Count	Last Name	First Name	Organization/ Address	Comment Method	Date Received
1	Fohn	Michael		Email	09/12/2024
2	Doran	Molly	Skagit Land Trust	Email	09/18/2024
3	Trohimovich	Tim	Futurewise	Email	09/18/2024
4	Good Rubenstein	Kim	Skagitonians to Preserve Farmland	Email	09/18/2024
5	Priest	Galen	Swinomish Indian Tribal Community	Email	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 – 3rd 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?

2nd 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

From: Michael Fohn <michael@fohn.co>
Sent: Thursday, September 12, 2024 1:46 PM
To: PDS comments
Subject: "Skagit County's 2025 Comprehensive Plan Draft Policies"

Hello,

As a part of the 2025 Comprehensive Plan Update, careful consideration needs to be given to providing adequate commercially developable land for the expansion of economic activity.

Skagit County needs to attract higher paying jobs for all generations. Many of the younger generations are being forced to live some other than Skagit County because of the very modest economic development opportunities.

Strong communities need a strong economic base.

Preferably, this commercially developable land would not be farmland, out of the floodplain and centrally located to the major highways in Skagit County.

The Bay View unincorporated UGA, BR-LI, meets all of these desired parameters and should be considered for expansion.

If after careful consideration of the current need for more commercially developable land it is determined that currently is not the time to expand the Bay View Light Industrial UGA, then at a minimum, area surrounding the BVLI UGA should be designated as Urban Reserve Commercial Industrial URC-1.

Unfortunately, a very significant portion of the undeveloped BR-LI property is controlled by three owners, limiting development opportunities for others. In addition, a significant portion of the undeveloped lands are wetlands. Skagit County needs more commercially developable lands to provide for economic development to support our growing population .

10 Years could be a long time to wait for another opportunity to expand the BR-LI, UGA. Waiting another 10 years could hinder Skagit County's economic growth. For better or worse the population of Skagit County will continue to grow, and these citizens need well-paying employment. More commercially developable land is needed to encourage the needed economic growth.

Michael Fohn
P.O. Box 650
Burlington WA

Tara Satushek

From: PDS comments
Sent: Wednesday, September 18, 2024 4:07 PM
To: Tara Satushek; Allen Rozema; Jack Moore
Cc: Robby Eckroth
Subject: FW: Skagit County's 2025 Comprehensive Plan Draft Policies

From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, September 18, 2024 3:58 PM
To: PDS comments <pdscomments@co.skagit.wa.us>
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Staff:

Enclosed please find Futurewise's comments on the first drafts of the Land Use and Housing elements. Thank you for considering our comments.

Comments on the Comprehensive Plan Element: Housing First Draft

Policy 7A-1.8

RCW 36.70A.070 and RCW 36.70A.070(2) provide that Skagit County and the cities and towns in the county "shall include:"

"(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[.]"

While the county selects a total population projection that is within the State of Washington Office Financial Management projection range, the housing units needed by income category shall be identified "as provided by the" State of Washington Department of Commerce Housing for All Planning Tool (HAPT). 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* on page 61 states "counties are required to use the HAPT to identify projected housing needs associated with their chosen countywide population target" These allocations include housing affordable to families earning a variety of categories in addition to the categories in Policy 7A-1.8. We recommend that Policy 7A-1.8 refer to the regional allocation from the HAPT with an emphasis on families earning less than 80 percent AMI.

Policy 7E-1.1

The *Washington Farmworker Housing Needs Assessment* recommended that to provide more affordable farm worker housing cities should be encouraged "to increase zoning and infrastructure investments for multi-family housing within urban growth areas." BERK Consulting, *Washington Farmworker Housing Needs Assessment* p. 184 (The Washington State Department of Commerce: Jan. 2022) last accessed on Feb. 18, 2024, at: https://www.commerce.wa.gov/wp-content/uploads/2022/04/CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf and enclosed in a

separate email with the filename: “CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf.” The assessment also recommended that cities remove “barriers to the development of rental housing.” *Id.* “Encouraging cities to identify and remove barriers to rental housing development is an important strategy to address housing needs for farmworkers.” *Id.*

Consistent with these recommendations we recommend that Policy 7E-1.1 call for cities to plan and zone for more multifamily housing within urban growth areas and remove barriers. Policy 7E-1.1(b) should also be retained as it is consistent with these recommendations.

Comprehensive Plan Element: Land Use First Draft

Policy 2A-1.1

The second subsection (e) refers to the discretionary authorization in RCW 36.70A.130(3)(c) that allows swaps of land into and out of urban growth areas if certain criteria are met. It is not a criterion for designating urban growth areas and should be deleted from Policy 2A-1.1.

Policy 2A-1.2

The added “patterns of development” refers to the discretionary authorization in RCW 36.70A.130(3)(c) that allows swaps of land into and out of urban growth areas if certain criteria are met. It is not a criterion for designating urban growth areas and should be deleted.

Policy 2A-4.1

The added “(f) patterns of development in the UGAs” refers to the discretionary authorization in RCW 36.70A.130(3)(c) that allows swaps of land into and out of urban growth areas if certain criteria are met. It is not a criterion for designating urban growth areas and should be deleted.

Thank you for considering our comments. If you require anything else, please let me know.

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, 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



Main Office: 360.466.3163
Facsimile: 360.466.5309

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

Mobile: 360-770-9963