

**TESTIMONY AND WRITTEN COMMENTS:
SCOPE OF 2016 COMPREHENSIVE PLAN UPDATE
RECEIVED 10/16/14 – 11/20/14**

*List updated 12/05/2014 to reflect all speakers at the public hearing, not just those whose names were on the sign-in sheets. *Indicates names added on 12/05/2014.*

<i>Name</i>	<i>Organization</i>	<i>Method</i>
Bell, Marjorie		Email (11/20/14)
Bowers, Kate*		Testimony
Brown, Michael*		Testimony
Brunisholz, Jacques		Email (11/20/14)
Burke, Heather		Email (11/20/14)
Bynum, Ellen	FOSC	Testimony + letter (11/17/14)
Campbell, Bonnie		Email (11/20/14)
Charles, Stuart		Testimony
Collinge, Iris		Testimony
Doran, Molly	Skagit Land Trust	Email (11/20/14)
Ehlers, Carol		Testimony + notes (11/20/14)
Erbstoeszner, Marie		Email (11/20/14)
Fox, Nancy	GIPAC	Testimony
Freethy, Diane	SCARP	Letter (11/19/14)
Good, Randy		Testimony
Gorr, Gilda		Testimony
Gorr, Gilda and Bill		Letter (11/17/14)
Guemes Island Planning Advisory Committee	GIPAC	Letter (11/17/14)
Hallberg, Jeroldine		Email (11/20/14)
Hurlimann, Cambria		Testimony
Kooiman, Marianne		Testimony + letter (11/17/14)
Krienen, Susan		Email (11/20/14)
Mangold, Scott		Testimony + email (11/20/14)
McGuinness, Cindy		Email (11/20/14)
McNett Crawl, Liz		Email (11/20/14)
Mitchell, Roger		Testimony + letter (11/17/14) + email (11/20/14)
Morgan, Greta*		Testimony
Munsey, Connie		Testimony + letter (11/17/14)
Orsini, Stephen		Email (11/20/14)
Rooks, Hal		Testimony
Rosenhan, Tim		Email (11/20/14)
Scott, Lori		Testimony
Scott, Lori and John		Letter (11/17/14)
Sherman, Paul		Email (11/20/14)
Stauffer, Ed*		Testimony
Xaver, Andrea		Email (11/19/14)

From: [Bell, Marjorie](#)
To: [PDS comments](#)
Cc: [Hawk, Carol](#)
Subject: Comments Regarding Proposed Scope of 2016 Comprehensive Plan
Date: Thursday, November 20, 2014 1:58:19 PM

To Skagit County decision makers:

Please address these issues in the proposed scope of the 2016 Comprehensive Plan update:

1. Update the Transportation Element policies to be consistent with the regional non-motorized plan being developed by SCOG. A strong pedestrian and bicycle component is desirable. Non-motorized transportation options and facilities across municipalities should be encouraged and prioritized. Active transportation improves community health and reduces traffic congestion. State Route 20's new designation as a US Bicycle Route has exciting possibilities for increased tourism dollars coming into Skagit County, especially in communities in the East County.
2. Urban planning approaches that increase physical activity should be reviewed and incorporated in the Comprehensive Plan. Urban design principles and practices create more compact and livable communities, where people of all abilities and income levels can access goods and services without getting in cars. Communities that offer increased opportunities for walking and biking also support intergenerational interaction and reduce social isolation, especially among young families and senior citizens. And of course, physical activity should be encouraged for people of all ages, as it improves physical health and reduces obesity-related diseases. This should not be considered solely an urban issue!
3. While this is not in the proposed scope, I would encourage the county to consider setting standards or benchmarks for purchasing Skagit-grown produce for county-sponsored/served meals. This might include in meals served at the jail and juvenile detention, at county-sponsored events and celebrations, etc.

Thank you,

Marjorie Bell, Program Planner

Community Health Outreach Programs

United General District 304

2241 Hospital Drive

Sedro-Woolley, WA 98284

360-854-7172

Note - you may notice my email is from MBell@peacehealth.org. This is only a temporary due to recent transitions. Please continue to use marjorie.bell@unitedgeneral.org. Thank you!

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From: [Jacques Brunisholz](#)
To: [PDS comments](#)
Subject: Scope of the 2016 Update of the Skagit County Comprehensive Plan
Date: Thursday, November 20, 2014 1:36:15 PM

Jacques Brunisholz
PO Box 905 / 515 Talbott Street
La Conner WA 98257

re:
> Scope of the 2016 Update of the Skagit County Comprehensive Plan

Please :
Pedestrian / Equestrian / Bicycling and all other non motorized forms of transportation should be given the highest possible priority in all planning.
This will have a positive impact for Skagit County Residents on many levels:

- Health
- Environment
- quality of life
- tourism

to name just a few

Thank you

Jacques Brunisholz
PO Box 905 / 515 Talbott Street
La Conner WA 98257

From: [Heather Burke](#)
To: [PDS comments](#)
Subject: Comments on Proposed Scope for 2016 Update.
Date: Thursday, November 20, 2014 2:45:25 PM

I support non motorized means of transportation throughout
Skagit County.
Heather Burke

From: [bonnie campbell](#)
To: [PDS comments](#)
Subject: Scope of 2016 update of skagit county comprehensive plan
Date: Thursday, November 20, 2014 3:18:01 PM

I support bike and pedestrian focus on the scope of 2016 update of skagit count comprehensive plan! It is truly a shame the our beautiful county has so few outlets for this and that it is not a priority for daily use as far as communting, family activities and enjoying our valley. Riding on roadways is a poor excuse as opposed to respect for those who choose this way of transportation. We need safe pathways. Look at bellingham!!! Let's start doing something valuable healthy and make a difference!

Friends of Skagit County

PO Box 2632
Mount Vernon WA 98273-2632

www.friendsofskogitcounty.org
360-419-0988 phone

friends@fidalgo.net
Donate at: www.networkforgood.org

November 17, 2014

Commissioner Ken Dahlstedt
Commissioner Sharon Dillon
Commissioner Ron Wesen
Skagit County Admin. Bldg. #100
1800 Continental Place
Mount Vernon WA 98273

Dear Commissioners:

Thank you for the opportunity to comment on the Proposed Scope for the 2016 Comprehensive Plan update. We understand the Board's concern for limiting staff time and funds spent on the update. We also know that both SCC 14.08 as well as the RCWs for planning include a specific set of activities and actions to be taken in order to assure that the public is informed, educated and participates fully in the update process. Determining that an update is to be "limited" before even asking for public input seems to have missed the point of full and continuous public involvement.

Let me start by saying that we were advised by County staff that if we do not state that we are opposed to what is being proposed, the County counts the testimony as being in favor. We question why this should be the case. It would be just as inaccurate to say if a person did not say they supported a proposal to count them as being opposed.

To that advice we are opposed to the suggested scope of the 2016 Comprehensive Plan process as written because it does not reflect enough information for the public to adequately judge the accuracy of the proposals. We do support keeping the update scope focused on GMA requirements and making additions to the Plan where it was clearly legally required by a court or legislative action. We oppose making additions when the addition is written, for example in the referenced WAC, as optional, or to be done "whenever possible", without a work sessions and full public hearing on the proposed change.

We oppose using the Planning Commission as the 2016 Update Advisory Committee as this role appears to conflict with the description of the role of the Planning Commission in SCC **14.08.80 Review by Planning Commission**.

(1) **Prior to Planning Commission review, the Department shall prepare a staff report on any proposed plans, amendments or development regulations summarizing the comments and recommendations of any Citizen Advisory Committee or Technical Advisory Committee** as provided in the Skagit County Growth Management Act Public Participation Program as amended, County departments, affected agencies and special districts, and evaluating the proposed plan's, plan amendment's, or development regulations' consistency with adopted County plans and regulations..." (**emphasis added**).

Read with SCC **14.08.070 Public Participation requirements**, it is clear that the Planning Commission has a different duty in reviewing the recommendations and reports from the CAC or TAC. We do not agree that because 14.08 is silent about using the Planning Commission as the CAC, it is legally possible to do.

As allowed under **14.08.070 (3)(b)** attached below, we hereby request the Board to consider calling for a new CAC and/or TAC relating to a GMA purpose, the 2016 Comprehensive Plan Update.

We support providing adequate time and opportunity for public input and completing the process on time.

We oppose referencing the cost of the 2005 update as a reason not to have adequate public involvement in this update.

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Additional discussion and information is needed to determine if all of the proposed items are actually required to be included in the update. For example, Proposed Change 2. **Consider urban planning approaches that increase physical activity.** The RCW 36.70A.070(1) states:

“...Each comprehensive plan shall include a plan, scheme, or design for each of the following: (1) A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces, general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies. **Wherever possible**, the land use element **should consider utilizing urban planning approaches that promote physical activity.** Where applicable, the land use element shall review drainage, flooding, and storm water run-off in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound....”.

Shouldn't the policy the county wants to change reflect the same language of the RCW and add “whenever possible” to the policy? The Proposed Change 2 also states that the Transportation Element update will include relevant policies from the regional non-motorized transportation plan being developed through SCOG, but does not describe any of the policies.

We would appreciate seeing additional information on the Skagit County Code amendments. Although the table provided was helpful, a reader cannot be certain the intent of some of the proposed changes. In most instances, an explanation as to how some of the changes affect current code is not enough to determine whether the changes should be included. At a minimum a work session before the Planning Commission's consideration, just on the code changes, should be held with staff supplying additional explanations on each.

Friends of Skagit County and other Skagit organizations, citizens and past and current staff and elected officials have all worked to create the Comprehensive Plan that we now use. The Plan has kept Skagit County from becoming the Kent Valley, and as a document that changes to reflect the times, it will always need re-examination to make sure it is what the public wants for Skagit County. The 7-year update process is the sole opportunity citizens have to suggest ways to improve the County Wide Planning Policies, the Comprehensive Plan, development regulations and the County code. We think it is important to invest the time, involve the public and make good decisions that can stand without the need for legal challenge.

The first planning process held some 26 public meetings around the county, gathered comments and ideas as part of the visioning process and involved formation of a number of Citizen Advisory groups in that order. We understand the visioning process was conducted with many more staff than are now available; however, the process also involved a very large number of citizen volunteers for over a year. We ask the Board to consider inviting citizens to volunteer to serve on CACs for each element of the Comp Plan, much as was done in the initial writing of the plan.

While a new visioning process may not be needed, the 50,000 citizens who did not participate in the original visioning process might like to review and consider the 1,500 comments submitted to the County to understand whether these comments still reflect the values, scope and direction they want for Skagit County.

The visioning statements informed the summation of these by staff into the County-wide Planning Policies which were written before the Comprehensive Plan process was started. The County could use a similar process to review the CWPPs in a work/education session before considering updates to the existing Comprehensive Plan. This would also help the public evaluate whether the proposed changes may or may not be needed.

Under the section on the role of the CWPPs number “i” states: “These countywide planning policies **shall be the foundation** for the Skagit County Comprehensive Plan” (**emphasis added**). If no changes are proposed to the CWPPs then the scope of the update should be consistent with what is in the current CWPPs. If there are proposed changes to the

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CWPPs requested by staff or elected officials, then the process should be to bring the proposed changes before the public for a work session, then for a public hearing to consider those changes before the Comprehensive Plan update begins.

In the first work on the Comp Plan, the Planning Commission and the BOCC both held work sessions before accepting the parts of the Comprehensive Plan for deliberation and adoption. The work sessions provided a chance for open questioning and comments and discussion with the public. We recommend you consider holding a work session to explain the proposed updates to the public. And we ask that you also consider additional work sessions to discuss Comprehensive Plan amendments proposed by the public.

Which brings us to the cost of proposing a Comp Plan amendment - \$5,000. This fee is imposed for policy, map amendments and development proposals. We ask that the BOCC consider dropping the fee for CP amendments that apply only to policies so that full public participation can proceed. Additionally, we request that the county stop using the joint form for the CP amendments and development proposals and create a CP amendment form that is more relevant to proposed policy changes.

Two examples of Comp Plan amendments that come to mind are as follows:

1. The County policy of “no net loss” of farmland” has not been implemented. We suggest a Comp Plan amendment that would voluntarily remove land used for agricultural purposes in rural zones and re-zone these as Ag-NRL to make up for the thousands of acres that have been converted to uses other than ag since the “no net loss” policy was passed. Because these rural zoned parcels have more than 1 DR per 40 acres, the owner would have to be willing to donate the development rights to the County’s Farmland Legacy Program, which is why we suggest that the program be voluntary.

2. The CWPP guiding 80% of new residents into cities and 20% into rural Skagit County. Since the County implemented this policy, there has been no policy proposed that would “correct” future development to meet the CWPP goals. Calculating how much development still happened in rural Skagit each year the goal was not met would give the County an idea as to how much development should be accepted in future years in order to meet the goal.

These are both policy amendments which could be discussed and determined in the 7 year CP update process, as we understand it.

We request that you extend the public comment period until a public work session can be held and citizens have adequate understanding of any proposed changes to the CWPPs, the Comprehensive Plan and any development regulations or code changes resulting from these proposed changes.

Thanks very much for your time and continued service.



Ellen Bynum
Executive Director

cc: FOSC Board.

Attachment

14.08.070 Public participation requirements.

- (1) This Section addresses the creation and roles of Citizen Advisory Committees (CACs) and Technical Advisory Committees (TACs), and provides for public notification requirements in addition to any such requirements otherwise required by this Chapter.
- (2) Unless exempted by this Section, the Board shall establish 1 or more CACs or TACs, as appropriate, to participate and assist in the initial development of Comprehensive Plan elements, subarea plans and functional plans. The Board shall seek to have a variety of interests represented on such committees.
- (3) A CAC or TAC may be initiated by 1 of the following methods:
 - (a) The Board may establish one by resolution; or
 - (b) Any citizen may request the Board to consider calling for a new CAC or TAC relating to a GMA purpose. The Board will take public comment on the request. If the Board is convinced that a new CAC or TAC would be useful, the Board may authorize its formation by resolution.
- (4) The BCC may establish a procedure for taking applications and selecting membership to the CAC or TAC, including establishing a term of service and a method of reappointment (if any) or replacement of members. The BCC may also establish by resolution rules of procedure and time frames for recommendations by a CAC or TAC.
- (5) CACs and TACs shall follow the requirements of Chapter 42.30 RCW, Open Public Meetings Act. All meetings of the CAC or TAC shall be open to the public and held at a site and times when the working public can attend. The CAC and TAC shall establish and publish a schedule of meeting days, times and locations for main group and subcommittee meetings and shall keep minutes of committee and subcommittee meetings.
- (6) A County staff person will be assigned to each CAC and TAC, and will provide staff support and maintain a copy of the record of such committee or subcommittee.
- (7) Notwithstanding the procedure outlined in this Section, if the Board determines that time constraints imposed by orders from the Western Washington Growth Management Hearings Board or other legal requirements likely cannot be met if a CAC or TAC is established and utilized as provided in this Section, the Board need not honor a request to form the CAC or TAC, even if it would be useful to do so.
- (8) The Board may forward a CAC or TAC recommendation to the Planning Commission, or it may make suggested changes to such recommendation and either remand it to the CAC or TAC for further consideration, or forward the CAC or TAC recommendation to the Planning Commission with the Board's suggested changes.
- (9) Public Notification—General Legislative Proposals. Where public notice is otherwise required by this Chapter, information regarding any legislative proposal shall also be broadly disseminated to the public using 1 or more of the following methods as determined to be appropriate for the specific proposal by the Administrative Official or Board:
 - (a) Publishing an additional paid public notice sufficient to inform the public of the nature of the proposal, the date and time of the public hearing, the appropriate contact name and number, and the availability of relevant draft documents;
 - (b) Distributing a press release to the newspaper of general circulation, or radio station in the County, city, or general area where the proposal is located or that will be affected by the proposal;
 - (c) Notifying individuals or groups with known interest in the type of proposal being considered, or who have requested to be notified in relation to a specific legislative proposal. The Department may charge a subscription fee for the administration of mailing lists of persons or groups requesting to be notified in writing, when such notification has also been published in the newspaper of general circulation;
 - (d) Placing notices in appropriate regional, neighborhood, ethnic, or trade journals; and
 - (e) Publishing notice in agency newsletters or sending notice to agency mailing lists, including general lists or lists for specific proposals or subject areas.
- (10) Public Notification—Site-Specific Comprehensive Plan/Zoning Map Amendments. Where public notice is otherwise required by this Chapter, for site-specific legislative proposals, such notice shall be mailed directly to the owners of the affected properties, and to all property owners within 300 feet of the subject property.
- (11) Public Participation. In addition to public notice as otherwise required by this Chapter, the public shall have the opportunity to participate in County legislative matters via public hearing(s), written comment, and other forums as appropriate. (Ord. O20090011 Attch. 2 (part); Ord. O20070009 (part); Ord. 17938 Attch. F (part), 2000)

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Addendum to POSC comments re: 2016 Scoping
for Comprehensive Plan process 11-17-14

Board of County Commissioners direct Skagit County
February 1990
Planning and Community Development to
review and recommend changes to district policies,
including the recommendations of a county-wide
comprehensive plan process.

APPENDIX B OVERVIEW OF COMPREHENSIVE PLAN PROCESS

Formal establishment of environmental review, SEPA co-
lead status in the interim urban growth areas.
1990

- March 1965 Skagit County adopts its Comprehensive Plan.
- September 1968 Comprehensive Plan is amended.
- 1970 - 1980 Sphere-of-Influence agreement passed. County/city cooperative efforts define lands surrounding city limits.
- 1973 Resource Management begins with adoption of large tract zoning requirements for agriculture lands.
- December 1973 North Central District Plan is adopted.
- September 1974 Northwest District Plan is adopted.
- August 1975 Islands District Plan is adopted.
- 1976 First forestry large tract requirements are passed.
- 1979 Five acre rural zoning district is adopted.
- July 1979 Southwest and South Central District Plans are adopted.
- April 1981 Resolution 8854 is passed enabling Joint Sphere of Influence agreements with cities.
- June 1981 Amendment to Resolution 8854 is passed.
- June 1981 Resolution 9312 is passed adopting Joint Sphere of Influence areas.
- May 1982 Eastern District Plan is adopted.
- 1987 Ordinance No. 11158 established a Memorandum of Understanding to initiate joint comprehensive planning with Swinomish Tribe.

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- February 1990 Board of County Commissioners direct Skagit County Department of Planning and Community Development to review and recommend changes to district policies, including the recommendation of county-wide Comprehensive Plan policies.
- 1990 Formal establishment of environmental review SEPA co-lead status in the interim urban growth areas.
- April 1990 Growth Management Act passes House and Senate.
- June 1990 Growth Management Act planning team established.
- July 1990 Growth Management Act of 1990 formally adopted.
- September 1990 Vision for the Future, Vol. I published. Beginning of educational media campaign encouraging citizen participation in the Comprehensive Plan updating process. Thirty thousand (30,000) tabloid copies carried by Skagit Valley newspapers.
- October 1990 - March 1991 Comprehensive Plan Policy Review and Update. Twenty-six community-wide meetings generated approximately 1,500 community values, statements and proposed policies.
- April 1991 A Vision for the Future, Vol. II published. Contained County's GMA Progress Report and update on watershed and shoreline plans, wetlands, natural resource areas, interim urban growth areas, and building permit information.
- July 1991 Passage of Reengrossed House Bill 1025 requiring that policies be compatible with both city and County Comprehensive Plans.
- October 1991 Public Hearing on proposed Draft Comprehensive Plan Policies.
- October 1991 Planning Commission holds six policy study sessions over six months with
- March 1992 County and city staff to review public comment and recommendations for changes to existing Comprehensive

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- Plan policies as proposed on October 14, 1991 in draft form.
- March 1992** Second Draft Comprehensive Plan County-wide Regional Policy document sent to all interested parties, 1,500 participants on the GMA mailing list, and outside agencies for review and comment.
- April 1992** Public Hearing to take formal public testimony regarding proposed countywide Regional Comprehensive Plan policies.
- April 1992** Citizen Participation Newsletter mailed. Provided an update on GMA and comprehensive planning policy development and discussed upcoming citizen participation opportunities.
- July 1992** Adoption of the Skagit County Countywide Planning Policies by County and cities.
- September 1992** Informational Update Public Meetings (September 21, 23 and 30th). To discuss the development of and encourage citizen participation in the Housing, Forestry, Rural, Utilities, and Mineral Elements for Skagit County's Comprehensive Plan. Citizen Advisory Committee (CAC) application forms made available through media and meetings.
- October 1992** Citizen Participation Newsletter mailed throughout Skagit County informing readers of the Board of County Commissioner's appointments to the Skagit County Comprehensive Plan Element Citizen Advisory Committees.
- October 1992** Citizen Advisory Committee Orientation meeting held.
- October 1992 - August 1993** Ongoing Citizen Advisory Committee meetings for the Rural, Housing, Forestry, Agriculture, Utilities and Mineral elements.
- December 1992** In the winter of 1992, county-city discussions began relating to the establishment of Interim Growth Areas.

SKAGIT COUNTY Comprehensive Plans Overview of Comprehensive Plan Process

- July 1993 Adopting Temporary Interim Zoning for Unincorporated Skagit County which established 5 acre minimum lot sizes for multi-family residential, residential, residential reserve and rural intermediate zoning districts.
- September 1993 Citizen Participation Newsletter mailed. Information on upcoming citizen participation opportunities. Update on County activities on urban growth areas, land use designations, CAC activities, additional comprehensive plan elements and the environmental review process on proposed Comprehensive Plan.
- September 1993 Growth Management Act and State Environment Policy Act (SEPA) Comprehensive Plan informational meetings held in Concrete, Fidalgo Island and Mount Vernon.
- October 1993 Passage of Ordinance 15038 adopting Interim Urban Growth Areas.
- November 1993 Citizen Advisory Committee Open House for community review of proposed comprehensive plan element policies on rural, forestry, minerals, housing and agriculture.
- December 1993 Planning Commission study session on proposed Comprehensive Plan Policies.
- 1994 County ordinance recognizes Swinomish Tribal Community, the Upper Skagit, and the Sauk-Suiattle Tribes as sovereign governments which created a government to government relationship.
- January 1994 A Vision for the Future, Vol. III published. Forty-five thousand (45,000) copies included in all newspapers within Skagit County. Provided an overview of the Draft Environmental Impact Statement (DEIS), a programmatic, non-project approach used to address the impacts of anticipated population increases in Skagit County consistent with Growth Management Act requirements. Department invites comments on the alternatives presented in the DEIS. Timeline outlined additional opportunities for public comment during the comprehensive plan adoption process.

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- January 1994 Draft Environmental Impact Statement (DEIS) is published.
- January 1994 Planning Commission Study Session on Land Use Designation Element held.
- January 1994 Planning Commission Study Session on Draft Environmental Impact Statement (DEIS).
- January 1994 Planning Commission Public Hearing on Draft Land Use Element and DEIS.
- February 1994 Planning Commission Study Session on review of Citizen Advisory Committee (CAC) draft Natural Resource Conservation Element.
- February 1994 Planning Commission Public Hearing on Natural Resource Conservation Element.
- March 1994 Adoption of Ordinance 15280 amending Ordinance 15038 regarding Interim UGAs.
- March 1994 Planning Commission Study Session to review Public Hearing public comments and staff report.
- March 1994 Planning Commission Public Hearing on Planning Commission proposed Natural Resource Conservation Element (Agriculture, Forestry and Minerals).
- April 1994 Planning Commission Study Session for deliberations and recommendations on Agriculture, Forest and Mineral elements.
- April 1994 Planning Commission Study Session to review Citizen Advisory Committee's Draft Urban Growth Areas, Rural and Housing Elements
- April 1994 Planning Commission Public Hearing on Urban Growth Area, Rural and Housing Elements.
- April 1994 Planning Commission Study Session to review Citizen Advisory Committee Draft Utility and Transportation Elements.

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- April 1994 Planning Commission Public Hearing on Citizen Advisory Committee Draft Capital Facilities, Utilities and Transportation Elements.
- May 1994 Planning Commission Study Session to deliberate on public comments and testimony on UGA draft element policies and CAC proposed Rural and Housing policies.
- May 1994 Passage of Ordinance 15372 extending Temporary Interim Zoning Regulations.
- May 1994 Planning Commission Study Session on review of public comments and staff report.
- May 1994 Planning Commission Public Hearing on Utility and Transportation Elements.
- May 1994 Planning Commission Study Session on deliberations and recommendations on Forest Resource Element.
- May 1994 Planning Commission Study Session to consider and begin deliberations on Capital Facilities Element.
- May 1994 Planning Commission Study Session to review and deliberate on proposed Mineral Element.
- June 1994 Planning Commission Study Session to review and deliberate on proposed Capital Facilities Element.
- June 1994 Planning Commission Study Session for deliberations and recommendations on proposed Mineral Element.
- June 1994 Publication of Final Environmental Impact Statement for the Land Use Element.
- June 1994 Copies of the policies of the Natural Resource Conservation Element, Rural, UGA, Housing, Transportation, and Utilities Element available for comment.
- June 1994 Planning Commission Study Session on UGA policy document.

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

June 1994 Citizen Participation Newsletter mailed. Informed public of upcoming dates on the Comprehensive Plan proposed element policy documents.

June 1994 Passage of Ordinance No. 15432 authorizing the collection of impact fees.

July 1994 A Vision for the Future, Vol. IV published. Forty-eight thousand (48,000) copies included in all Skagit County newspapers. Tabloid presented information on the proposed Land Use Element, plan concept, objectives and designations; the Environmental Impact Statement for the proposed Land Use Element; a summary of land use actions which are part of proposal, maps of proposed Urban Growth Areas and Rural Villages; and the Executive Summary of the Skagit County Planning Commission Proposed Comprehensive Plan Element Policy document. Invited public and agency comments on the Final Environmental Impact Statement.

July 1994 Planning Commission Study Session to discuss the process and timeline for reviewing public comments and written correspondence on proposed Comprehensive Plan Elements.

July 1994 Public Hearings on July 11 and 12 on the Final Environmental Impact Statement for the Land Use Element and the Planning Commission Proposed Comprehensive Plan Element Policy Document.

August 1994 All written correspondence on the Final Environmental Impact Statement for the Land Use Element of Skagit County's Comprehensive Plan and the Skagit County Planning Commission Proposed Comprehensive Plan Element Policy document are made available to the Planning Commission and public. Materials photocopied included all letters received during the extended comment period of June 17, 1994 through July 29, 1994.

August 1994 All exhibits submitted at the Skagit County Planning Commission Public Hearings on July 11 and 12, 1994 on the Final Environmental Impact Statement for the Land Use Element for Skagit County's Comprehensive Plan

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- and Skagit County Planning Commission Proposed comprehensive Plan Element Policy Document made available to Planning Commission and public.
- August 1994** Planning Commission Study Sessions on the Economic and Utility elements and on Urban Growth Areas.
- September 1994** Planning Commission Study Sessions on Urban Growth Areas, and the Rural and Forestry Elements.
- October 1994** Publication of the Skagit County Planning Commission Revised Comprehensive Plan Element Policy Document and Revised Land Use Element.
- October 1994** Planning Commission Study Sessions on the Rural, Transportation, and Land Use Elements.
- November 1994** Planning Commission Study Sessions on the Land Use Element.
- December 1994** Planning Commission Study Sessions on Rural Villages.
- January 1995** Planning Commission Study Session on Land Use Element, Goal B.
- January 1995** Planning Commission Study Session on Environment and Capital Facilities Elements.
- January 1995** Public Hearing on Environment, Economic Development and Capital Facilities Elements.
- January 1995** Planning Commission Study Session to review public comments and written correspondence on Environment, Economic Development and Capital Facilities Elements.
- February 1995** Planning Commission Study Sessions on the Environment, Capital Facilities and Economic Elements.
- March 1995** Planning Commission Study Sessions on draft elements of the Comprehensive Plan.
- April 1995** Planning Commission Study Sessions to review draft Comprehensive Plan and Final Environmental Impact

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- Statement (FEIS) on Skagit County's Comprehensive Plan and Land Use Element.
- May 1995 Review of the draft Planning Commission Review Copy of the Comprehensive Plan, Map Portfolio and Addendum to the Final EIS.
- May 1995 Release of above documents for a 30 day comment period.
- May 1995 Determination of Non-Significance and adoption of existing environmental documents (to consider draft elements of the Comprehensive Plan on Natural Resource Conservation)
- May 1995 Notice of Availability on the Addendum to the FEIS for the Land Use Element of the Comprehensive Plan
- July 1995 Planning Commission Study Session to review and discuss Skagit County's 6 year Transportation Improvement Plan
- August - December 1995 Planning Commission reviews Public Comments of draft Comprehensive Plan
- November 1995 Board of Commissioners' adoption of Revised IUGAs, moving boundaries to existing city limits.
- December 1995 Planning Commission completes review of draft Comprehensive Plan
- February 1996 Critical Areas Ordinance before Planning Commission
- February - April 1996 Planning Commission review of Critical Areas Ordinance
- April 1996 Draft Critical Areas Ordinance
- May 1996 Board of County Commissioner public hearing on draft CAO
- May 1996 Critical Areas Ordinance adopted

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

- May 1996 Addendum to EIS issued on Skagit County classification and designation of Natural Resource Lands
- June 1996 Board of County Commissioners and Planning Commission hold public hearing on Natural Resource Lands
- June-July 1996 Planning Commission reviews public comments on Natural Resource Lands. Deliberates and forwards recommendation
- July 1996 Planning Commission holds public hearing and recommends approval of Countywide Planning Policies
- August 1996 Board of County Commissioners holds public hearing on draft Natural Resource Lands Ordinance and map
- August 1996 Board of County Commissioners approves amendments to Countywide Planning Policies
- August- October 1996 Interlocal Agreements re: Urban Growth Areas executed between County and cities of Anacortes, Burlington, Mount Vernon, Sedro-Woolley, and La Conner
- September 1996 Natural Resource Lands Ordinance adopted
- November 1996 Draft 1996 Comprehensive Plan and Draft Supplemental Environmental Impact Statement made available for public review and comment
- December 1996 Planning Commission public hearing on Draft 1996 Comprehensive Plan and Draft Supplemental Environmental Impact.
- January - March 1997 Planning Commission conducts twice a week study sessions to review public comment on the Draft Plan and DSEIS.
- March 1997 Planning Commission forwards recommendation on Comprehensive Plan to Board of County Commissioners.
- April 1997 In early April 1997, the Board of County Commissioners after review of the Planning Commission's recommendation identified several issues

SKAGIT COUNTY Comprehensive Plan Overview of Comprehensive Plan Process

that warranted further public debate and remanded the draft Plan back to the Planning Commission for additional public review and comment. Later in April 1997, the Planning Commission conducted a public hearing on the draft Plan, reviewed public comment and written correspondence, deliberated and forwarded a revised Plan to the Board of County Commissioners for review and action.

May 1997

In May 1997, the county issued the FSEIS on the draft Plan. On May 19, 1997 the Board of County Commissioners reviewed the Planning Commission's recommended draft Plan, deliberated, made revisions and passed Ordinance No. 16550 adopting this Comprehensive Plan.

03 20

From: [molly_doran](#)
To: [PDS comments](#)
Subject: Proposed Scope of 2016 Update
Date: Thursday, November 20, 2014 1:58:57 PM

Dear Mr Pernula,

Thank you for the opportunity to comment on the proposed scope of the 2016 Comprehensive Plan Update.

Skagit Land Trust is composed of more than 1500 supporters throughout Skagit County. We protect land for permanent conservation, sustainable resources and public access to Skagit's beautiful natural heritage. We own and manage thousands of acres of natural land in Skagit County and work with landowners and other conservation groups to conserve special lands through private, voluntary land conservation activities.

We are supportive of key elements of the proposed scope presented in the October 8 2014 memo based on our Conservation Strategy and Strategic Direction. These include:

- A pedestrian and bicycle component of the Transportation element.
- Consideration of updating the Transportation element to be consistent with the regional non-motorized transportation plan being developed by SKOG..
- The review and modification of urban growth area boundaries, if necessary.
- Consider urban planning approaches that increase physical activities (walking and biking).
- Review of critical area ordinance and best available science.
- Skagit County shoreline master program update.

We also note the need to begin steps to implement the UGA Open Space Plan and to follow recommendations that will begin to implement the Transfer of Development Rights Program.

Thank you for the opportunity to comment.

Molly Doran
Executive Director
Skagit Land Trust

Skagit Land Trust
1020 S 3rd
Mount Vernon WA 98273

mollyd@skagitlandtrust.org



Skagit County Planning & Development Services

DALE PERNULA, AICP Director

JACK MOORE, CBCO Building Official

11/10/14 BCC

18 pages - no appendices

Establishing the Scope of Skagit County's 2016 Comprehensive Plan Update

RECEIVED

NOV 20 2014

SKAGIT COUNTY
PDS

TO: Interested Public
FROM: Dale Pernula, AICP, Director
DATE: October 8, 2014

From: P. J. Ehlers
11/20/14
This is the start of what the BCC
needs to hear.

Like other jurisdictions around the state, Skagit County is required to conduct a periodic review and update of its comprehensive plan and development regulations to ensure consistency with updated state laws and population and employment projections. Skagit County must complete this periodic update, referred to here as the 2016 Update, by June 30, 2016.

This memo describes the proposed scope for the 2016 Update. The Board of County Commissioners ("the Board") will take written comment and hold a public hearing on the proposed scope, then adopt the 2016 Update scope by resolution. The adopted scope will guide Planning & Development Services' ("the Department") and the Planning Commission's work on the update.

In prior discussions with the Department, the Board has expressed its support for the following process goals for the 2016 Update:

- yes 1. Keep the update scope focused on GMA requirements.
- no 2. Use the Planning Commission as the 2016 Update Advisory Committee. *This violates 14.04.070 (1)-(6) - 0080. PC*
- yes 3. Provide adequate time and opportunities for public input. *reviews input. More - they are*
- yes 4. Complete the process on time. *overwhelmed by the volume of un-explained text on Shoreline.*

"Limited" Scope for 2016 Update

Skagit County undertook an extensive review of its comprehensive plan, land use/zoning map, and development regulations in the last major periodic update process, the 2005 Update. This included a year's worth of work with a Board-appointed 2005 Update Advisory Committee; an extensive policy "audit" of each Comprehensive Plan element; review of Natural Resource Land map designations by the County's Agricultural and Forest Advisory Boards, and submission by members of the public of map amendment proposals at no cost.

Because of the magnitude of the review, it took the County two years past the 2005 deadline to complete the process. At the time, the Department had four long-range planners and the County received more than \$300,000 in grant funds from the state specifically for the update. Now the Department has one long-range planner and no state grant funds are available.

Failure to provide staff is no excuse for the continual failure to understand Housing + Rural - Elements + Code

More recently, Skagit County undertook the Envision Skagit 2060 project which included extensive public outreach and engagement. Public input received through that process, together with the Envision Skagit Citizen Committee's recommendations, largely reinforce key goals and policies of the current Skagit County Comprehensive Plan, including:

- Encourage the majority of new population growth in cities and towns, which have the infrastructure and financial resources to provide urban services.
- Protect and sustain Skagit County's Natural Resource Lands and industries, and its environmental resources and open spaces, which contribute significantly to the County's economy and unique quality of life.
- Support rural communities and economies, maintain rural character, and discourage urban sprawl into rural lands. *SC encourages any commercial, industrial or high intensity use in RRU*
- Address the housing and transportation needs of the current and future populations through sound regional planning; and
- Maintain a strong economy by ensuring adequate land for current and future industrial development at Bayview Ridge. *yes*

The Board of County Commissioners has indicated it is satisfied with the current Skagit County Comprehensive Plan, Land Use and Zoning Map, and Development Regulations. For this reason, and due to the limited staff and financial resources noted above, the Board has indicated its desire to keep the scope of the 2016 Update limited to those items requiring review as identified below, rather than adding additional discretionary items. The exception is two dozen proposed amendments to the development regulations that the Department has identified over the past several years as needing clarification to maintain internal consistency with the comprehensive plan and other code provisions and to ensure efficient and consistent processing and review of development permits. These are listed in Exhibit 2.

By themselves, the items identified below that are required to maintain consistency with updated state laws and local circumstances (specifically population and employment projections), and to clarify existing provisions of code, represent a significant workload for the County, the Department, and the Planning Commission. *→ most of whom are new.*

Periodic Update Requirements

The Washington State Growth Management Act (GMA) requires Skagit County to review and, if necessary, revise its comprehensive plan and development regulations periodically (RCW 36.70A.130(1)). The GMA states:

...Except as otherwise provided, a county or city shall take legislative action to review and, if needed, revise its comprehensive land use plan and development regulations to ensure the plan and regulations comply with the requirements of this chapter...The review and evaluation required by this subsection shall include, but is not limited to, consideration of critical area ordinances and, if planning under RCW 36.70A.040, an analysis of the population allocated to a city or county from the most recent ten-year population forecast by the office of financial management. *I see no connection between GMA geohazards requirements,*

More specifically, the GMA requires review of urban growth areas as follows (RCW 36.70A.130(3)):

the Rev. ed. of 1989 SC Soil ² Survey and any rural decisions. At Bay View, there was never a map of existing water + sewer infrastructure.

(a) Each county that designates urban growth areas under RCW 36.70A.110 shall review, according to the schedules established in subsection (5) of this section, its designated urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas.

(b) The county comprehensive plan designating urban growth areas, and the densities permitted in the urban growth areas by the comprehensive plans of the county and each city located within the urban growth areas, shall be revised to accommodate the urban growth projected to occur in the county for the succeeding twenty-year period.

According to RCW 36.70A.130(5)(b), Skagit County is required to complete its review and update of the comprehensive plan, development regulations and urban growth areas by June 30, 2016.

Comprehensive Plan

Skagit County has identified the following Comprehensive Plan issues as requiring attention during the 2016 Update in order to 1) reflect updated population and employment projections and allocations, or 2) comply with changes in the Growth Management Act or other state statutes that have occurred since the County concluded its 2005 Update:

1. **Review and update the County's Transportation Systems Plan and Comprehensive Plan's Transportation Element.** The Skagit County Transportation Systems Plan was last updated in 2003. Required elements of the update include:

- a. A forecast of traffic for at least 10 years, developed in coordination with the Skagit Council of Government's ("SCOG's") update of the regional transportation model and plan linked to population and employment and related land use assumptions through 2036.
- b. A pedestrian and bicycle component, as required by RCW 36.70A.070(6)(a)(vii), (amended 2005) and WAC 365-196-430(2)(j). The County's current Transportation Systems Plan has a non-motorized component, and some related policies are included in the Comprehensive Plan's Transportation Element. The review will consider updating the Transportation Element policies to be consistent with the regional non-motorized transportation plan being developed by SCOG.
- c. A multiyear financing plan based on needs identified in the Transportation Systems Plan and Comprehensive Plan Transportation Element, which serve as the basis for the County's six-year street, road or transit programs.

Additional components of the Transportation Systems Plan and Transportation Element may be revised, as needed, to maintain consistency with RCW 36.70A.070(6) and WAC 365-196-430.

The transportation update will involve coordination with the cities and towns, the Washington State Department of Transportation, and other governmental and quasi-governmental groups through the Skagit Council of Governments (SCOG).

As described here, Trans. will be updated with no public input except bicycle people. This time³ the SCOG may succeed in taking the 6-year TIP, all County road money & getting Public Works. They tried that in 2007 but we followed the RCW. See 2007 Plan element.

There must be real public info, or the cities will control.

Urban in UGA. Many changes in RCW & County, practice needed before outside, Side walks are urban.

2. **Consider urban planning approaches that increase physical activity.** The County did not address this requirement, added in 2005 per RCW 36.70A.070(1) and WAC 365-196-405 (2)(j), in the 2005 Update. The County will review and potentially add to existing policies that address this requirement, including:
 - a. Policy 2A-6.3: "Concentrate facilities and services within Urban Growth Areas, using urban design principles, to make them desirable places to live, work and play; increased the opportunities for walking and biking within the community..."
 - b. Also Comprehensive Plan goals and policies on non-motorized transportation, including Chapter 8, Goal A-6, and policies 8A-6.1—6.10.

As noted above, the Transportation Element update will include relevant policies from the regional non-motorized transportation plan being developed through SCOG.

3. **Review and update the County's Housing Needs Assessment and Comprehensive Plan Housing Element (RCW 36.70A.070(2)).** This will include an updated inventory and analysis of existing and projected housing needs over the 20-year planning period (RCW 36.70A.070(2)(a) and WAC 365-196-410(2)(b) and (c)). Skagit County's housing needs assessment was last updated in the early 1990s. The update will draw on work done by the Board of County Commissioner-appointed Skagit County Affordable Housing Advisory Committee and its interim report: *Building a Skagit County Housing Affordability Strategy*. yes - see p 8

The review may also involve additional updates to the Housing Element as required to maintain consistency with RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a), and RCW 36.70A.540 and WAC 365-196-870.

4. **Update population and employment allocations.** The GMA Steering Committee has approved tentative population and employment projections and allocations for the 2016-2036 planning period (see Exhibit 1). Cities, towns and Skagit County will use the update process to determine whether they can accommodate their allocated population and employment within their existing urban growth areas. Ultimately Skagit County will adopt final projections and allocations for the cities, towns and the County into the Countywide Planning Policies. yes see p 8
GMA Steering C. has UGA responsibility along - not

5. **Review and modify urban growth area boundaries, if necessary (RCW 36.70A.130(3)).** over rural
One of the GMA periodic update requirements is for cities, towns, and counties to review urban growth areas and the densities permitted within them, to determine if they are able to accommodate the urban growth projected to occur in the county for the succeeding 20-year period (RCW 36.70A.110(2) and (6); RCW 36.70A.130; WAC 365-196-310.) Each jurisdiction, including Skagit County, will conduct its own analysis and planning to determine whether it is able to accommodate its population and employment allocations within its UGA. If any UGA revisions are necessary, those will be considered first by the applicable city or town, then by Skagit County. yes, carefully from a tax stand point.

The following policies related to urban growth areas also need to be updated:

- a. Urban growth area designation policies 2A-1.1—2A-1.5 need to be made consistent with RCW 36.70A.110(8) which prohibits urban growth area expansions into the 100-year floodplain except under limited circumstances.

- b. CP policy 2B-1.3 needs to be updated to reflect Skagit County's adoption of the *Skagit Countywide UGA Open Space Concept Plan* in 2009.
- 6. **Update land use and demographic data.** The County will also review the comprehensive plan to identify any land use and demographic data requiring updates. This will consist of a limited review that will not include proposed revisions to goals and policies unless already noted above.
- 7. **Integrate existing subarea plans, Skagit County Parks and Recreation plan, and Capital Facilities Plan as chapters in the comprehensive plan,** and consolidate the capital facilities components of each into the Comprehensive Plan's Capital Facilities chapter. *And substantially, add to appendix C*

Land Use/Zoning Map

The County does not anticipate initiating its own amendments to the Skagit County Comprehensive Land Use/Zoning Map through the 2016 Update, other than possible UGA boundary modifications as noted above.

There is one more Comprehensive Plan Amendment docketing cycle that will occur before the deadline for the 2016 Update. Members of the public may submit map amendment proposals through the annual comprehensive plan amendment procedures described in SCC 14.08.020 (including fees for site-specific map amendments). The deadline for those submissions as established by code is July 31, 2015.

If map amendment proposals are received by that time, the Board of County Commissioners may consider moving any docketed amendments forward through a stand-alone 2015 Comprehensive Plan Amendment docket or adding them to the 2016 Update docket. In either case, final action on any amendments submitted by July 31, 2015 would likely occur at the same time as final action on the 2016 Update, as the County may only amend its comprehensive plan once per year. Adding map amendments to the 2016 Update docket would only be prudent if review of those amendments can be done consistent with the 2016 Update schedule and deadline of June 30, 2016. Alternatively the Board may decide that consideration of map amendments is not timely or feasible until after the 2016 Update is completed.

Development Regulations

The Department has determined that the following development regulations require review and possible revision through the 2016 Update. Most of these are required for purposes of consistency with state laws that have changed since the County adopted its 2005 Update.

- 1. **Implement forest practice regulations related to the transfer of jurisdiction over conversion-related forest practices from DNR to local governments** (RCW 36.70A.570 and RCW 76.09.240, both amended in 2007 and 2010). For counties planning under the GMA, if more than 25 Class IV applications have been filed with the DNR between certain dates, then the county and the cities within it are required to adopt forest practices approval ordinances. This review will also consider implementation of the "Rural Forestry Initiative" concept proposed by the Forest Advisory Board if that has not already been completed.

DNR forestry rules prohibit "protecting downhill private infrastructure" anywhere, not just in forest zones. Clear cuts = much more, faster water. J. Cooper says he may not regulate drainage ponds.

Start by using geological + geomorphological information from saltwater shorelines.

2. **Review of the critical areas ordinance and best available science** (RCW 36.70A.130(1)(c), updated in 2010). State law requires that jurisdictions consider the best available science (BAS) in developing policies and development regulations to protect the functions and values of critical areas. Skagit County is required to review the critical areas ordinance (which underwent a significant update in 2008) and any recent developments in best available science as part of this 2016 update. Relevant Comprehensive Plan policies will also be reviewed. Because of the County's enrollment in the Voluntary Stewardship Program, updating to the Ag-Critical Areas Ordinance (SCC 14.24.120) does not appear to be necessary, although that could be affected by legislation in the next State legislative session.
3. **Implement development regulations to allow battery charging stations and other "electric vehicle infrastructure"** (RCW 36.70A.695, new in 2009). These uses must be allowed in all areas except those zoned for residential or resource use or critical areas.
4. **Amend Skagit County Code (SCC) 14.18.100(6)(b) regarding preliminary subdivision approvals.** This needs to be made consistent with time limits established in RCW 58.17.
5. **Amend SCC 14.30.080 and .090 regarding the timeframe for expending or encumbering impact fees.** These code provisions need to be made consistent with RCW 82.02.070 and RCW 82.02.080 and WAC 365-196-850, amended in 2011.

The County will also propose a limited number of amendments to Skagit County Code. These will consist of clarifying amendments that Planning & Development Services has compiled over the last several years but has not had time or resources to update previously. See Exhibit 2 for details.

Additional Items

Several other code provisions must be adopted by the 2016 Update deadline and are already moving forward as separate planning projects. If any of these projects fall behind their current schedules, they may be incorporated into the 2016 Update with the goal of adopting them with the remainder of the 2016 Update proposal by the June 30, 2016, deadline.

1. **Code amendments related to Skagit County's 2012 Municipal Stormwater Permit.** Implementing the County's stormwater permit requires adoption of code changes to facilitate, and in some cases require, Low Impact Development (LID) techniques to manage stormwater. Many of these methods are defined and allowed in the Department of Ecology's 2012 Stormwater Management Manual. This project is currently on schedule for completion in 2015. yes
2. **Skagit County Shoreline Master Program Update.** Skagit County (along with every other city and county in the state) is working on updating its shoreline regulations. In 2003, the state Legislature established funding, timelines, and guidelines requiring all cities and counties to update their local Shoreline Master Programs prepared under the Washington State Shoreline Management Act. yes

Through the 2016 Update, the County must ensure that its zoning is consistent with Shoreline Master Program environment designations and that protection of critical areas in shorelines is accomplished through the Shoreline Master Program. The Shoreline Master Program update will also result in identification of a Skagit River channel migration zone.

How can PC do all this?

Re Participation: This document appears to represent the concept "my mind is made up, don't give me more facts"

Public Participation

Per RCW 36.70A.130(2), Skagit County is required to have, and does have, a public participation program consistent with RCW 36.70A.035 and 36.70A.140 establishing procedures and schedules for comprehensive plan updates and amendments. Skagit County's public participation program, found at SCC 14.08.070, and other legislative procedures described in SCC 14.08, will guide the public process for the 2016 Update. These code provisions establish the following major steps the County will follow for the 2016 Update:

- Initiation of review of amendments (SCC 14.08.030)
- State Environmental Policy Act (SEPA) Review (SCC 14.08.040)
- Public notification (SCC 14.08.070(9) and (10))
- Public participation (SCC 14.08.070(11))
- Review by Planning Commission (SCC 14.08.080), and
- Review and decision by Board of County Commissioners (SCC 14.08.090)

The Board of County Commissioners has indicated that the Skagit County Planning Commission will serve as the County's 2016 Update Advisory Committee, assisting the Department in the development of the 2016 Update proposal. This will maximize efficiency of both time and resources and will help to ensure that the Planning Commission has ample opportunity to vet major elements of the 2016 Update proposal before it is released for public review and comment.

As part of developing the proposal, the Department will hold work sessions with the Planning Commission on major topics being considered through the 2016 Update. The Department and the Planning Commission will take input from members of the public as part of these work session. Work sessions providing an opportunity for public input will be held on the following major topics:

- Updates to the Transportation Systems Plan and Transportation Element.
- Consideration of urban planning approaches that increase physical activity.
- Updates to the Housing Needs Assessment and the Comprehensive Plan's Housing Element
- Population and employment forecasts and allocations.
- Reviews of urban growth boundary amendments, if any are proposed.
- Development of forest practice regulations related to the transfer of conversion-related forest practices from DNR to Skagit County.
- Consideration of other proposed amendments to Skagit County Code.

In consultation with the Board of County Commissioners and the Planning Commission Chair, the Department may schedule additional public work sessions as needed.

The entire 2016 Update proposal will be available for public review and comment per the provisions and requirements of SCC 14.08 cited above.

The Department has launched a 2016 Update webpage that can be found at:
www.skagitcounty.net/2016update.

Exhibit 1: Preliminary population and employment projections and allocations approved by the GMA Steering Committee on July 31, 2014

Urban Growth Areas	2036 Initial Population Allocations	2015 - 2036 Forecast Population Growth	2015 - 2036 Forecast Population Growth Percent	2036 Initial Employment Allocations	2015 - 2036 Forecast Employment Growth	2015 - 2036 Forecast Employment Growth Percent
Anacortes	22,293	5,895	16.5%	10,480	2,076	13.0%
Burlington	14,272	3,808	10.7%	13,412	3,516	22.0%
Mount Vernon	47,403	12,434	34.8%	21,288	4,785	29.9%
Sedro-Woolley	17,069	4,555	12.7%	6,324	1,572	9.8%
Concrete	1,193	320	0.9%	467	109	0.7%
Hamilton	427	114	0.3%	288	66	0.4%
La Conner	1,226	329	0.9%	1,420	329	2.1%
Lyman	605	162	0.5%	38	9	0.1%
Bayview Ridge	1,883	72	0.2%	3,455	1,799	11.2%
Swinomish	3,416	912	2.6%	1,247	290	1.8%
UGAs Subtotal	109,787	28,601	80%	58,419	14,551	91%
Rural (outside UGAs)	45,665	7,150	20.0%	9,343	1,447	9.0%
Grand Total	155,452	35,751	100%	67,762	15,998	100%

Notes: the figures for cities and towns include their associated UGAs. Washington State projections used in employment growth forecast are for non-farm jobs and exclude proprietors, self-employed, unpaid family or volunteer workers, farm workers, and domestic workers.

Sources: BERK Consulting 2014; Skagit Council of Governments 2014

Does this population data for Anacortes include the cost for A. of a second sewage treatment plant? When A was set to include all of Fidalgo Island in 1990-2, DOE required a new, costly (\$27 million) sewer plant for a population buildout to 18,300 people. No one would loan more than \$7,000,000, so we had to pay \$10,000,000. A may have forgotten - do you think DOE would forget? More than 18,300, more investment.

Apparently, it is good policy to ignore where 43,000 people live, now. Good attention to the single largest group of people requires knowing where they are, why they are there, what are the economic reasons they are there instead of something called a 'city', and what is needed to preserve their economic well being - if they are ok. And, if not, as I see in rural areas, are their county laws, habits or contempt for standards that could be modified to follow the county wide policies on Housing?

Exhibit 2: List of proposed amendments to Skagit County Code (SCC)

Description of Proposed Code Amendments	
1. SCC 14.02.050 Vesting of applications. Consider amendments to ensure vesting provisions are consistent with state law and internally consistent with SCC 14.06, Permit Procedures.	ok
2. SCC 14.08.020(3) Petitions for Comprehensive Plan amendments and/or rezones. Restructure for easier understanding in an outline or table format. Reword language regarding 7-year state-mandated GMA update since the frequency of these updates is subject to change by the state legislature.	ok
3. SCC 14.08.020(5) Timing and procedures for UGA boundary amendments. Reword language regarding 7-year state-mandated GMA update since the frequency of these updates is subject to change by the state legislature. Clarify that urban growth area (UGA) boundary amendments are due by same deadline as all other annual Comprehensive Plan amendments, and may only be submitted by the jurisdiction (county, city, town or tribe) whose UGA is proposed to be modified.	ok
4. SCC 14.08.020(7)(c)(iii) Comprehensive Plan amendments/rezones to a commercial or industrial zone. Remove requirement that development projects must be commenced within 2 years of redesignation/rezone or the commercial/industrial designation will be removed. Does not account for economic downturns and that amendment/rezone process is sufficiently rigorous that map changes should be long-term.	good
5. SCC 14.08.020(7)(b)(i), Submittal requirements for rezones within a UGA. Clarify that petitions for rezones within a UGA or associated with a UGA expansion proposal are not required to include a detailed development proposal.	must be a public procedure
6. SCC 14.16.420(2)(o) and (q), SF-NRL permitted uses. Clarify distinction between (o) water diversion structure and impoundments, and (q) watershed management not including water diversion structures and impoundments.	ok
7. SCC 14.16.100(2)(w)(ix)(K), Alger Rural Village Commercial. Remove "tasting rooms" from list of permitted uses. Tasting rooms are already allowed under (ix) Small retail and service businesses. Listing of tasting rooms is an oversight from a previous effort to remove the term from all zones where it's already permitted as an agricultural accessory use or a small retail use.	
8. SCC 14.18.300 Conservation and Reserve Developments (CaRDs). Clarify that transfers through a CaRD of development rights from a higher density zone to a lower density zone are not permitted.	ok
9. SCC 14.16.600(3), Unclassified use permits. Revise reviewing authority for unclassified use permits from the Planning Commission to the Hearing Examiner. In most jurisdictions these are handled by the Hearing Examiner because they are project related not legislative matters. Also clarify essential public facilities siting process within SCC 14.16.600.	ok
10. SCC 14.16.720, Personal wireless services facilities. Amend code to reflect changes in federal law regarding permitting of "eligible facilities requests," i.e. certain limited modifications to existing wireless facilities.	ok
11. SCC 14.38.030, Natural Resource Land disclosure mailing. Remove section (1)(a) requiring Skagit County to mail disclosure statement every 3 years to all landowners whose parcel(s) lie within 500 feet of an area designated as a Natural Resource Land.	
12. SCC 14.38.030(1)(b) Natural Resource Land disclosure recording. Modify so that upon transfer of real property by sale, exchange or other means, the <i>buyer</i> shall be required to sign and record with the County Auditor a statement containing the Natural Resource Land disclosure language set forth in SCC	

14.38 entire must be reviewed. public has no idea it exists. Now that marijuana can be grown anywhere without a hearing on "ag" land, and no laws govern it, we are abandoned.

<p>14.38.030(2).</p> <p>13. SCC 14.16.870, Notification of development activities on or adjacent to designated Natural Resource Lands. Remove current requirement that applicant for a development permit record a title notice regarding the parcel's proximity to designated Natural Resource Land. Recording of signed notice more effective and appropriate at time of property sale or transfer, per item number 12 above.</p>	<p>do whole of 14.38</p> <p>intent was to protect large zones, result is economic damage from spot zones.</p>
<p>14. SCC 14.16.430(4)(g), mineral resource extraction in Rural Resource-NRL. Make language consistent with SCC 14.16.410(5)(d), Industrial Forest-NRL, and SCC 14.16.420(4)(d), Secondary Forest-NRL, by adding "pursuant to SCC 14.16.440, Mineral Resource Overlay" to SCC 14.16.430(4)(g), Rural Resource-NRL.</p>	
<p>15. Fueling stations: Make use descriptions for fueling stations consistent across zones in all relevant sections of code. <i>allow price signs everywhere</i></p>	
<p>16. SCC 14.16.195, Urban Reserve Commercial-Industrial, and SCC 14.16.200, Aviation Related. Move temporary events from administrative special use to permitted use.</p>	<p>? public review of code change</p>
<p>17. SCC 14.12.210, SEPA administrative appeals. Remove administrative appeals for project-level SEPA.</p>	<p>remove all of 210? no!</p>
<p>18. SCC 14.10, Variances, and SCC 14.16.810(4), Administrative Reduction of Setbacks. Amend the variance and administrative reduction of setbacks sections to clarify applicable criteria for granting a reduction in setbacks. <i>ok</i></p>	<p>yes</p>
<p>19. SCC 14.16.730 and SCC 14.16.900, Home Based Business. Place all Home Based Business code provisions in one section of code for ease of use.</p>	<p>? Is marijuana commercial?</p>
<p>20. SCC 14.16.730(2)(b), Home Based Business 1. Clarify that the business activity may be conducted in buildings other than the dwelling, provided that the size of such use does not exceed 25% of the living area of the dwelling unit.</p>	<p>ok</p>
<p>21. SCC 14.04.020, Definitions. Modify the definition of "Setback" to allow 8 foot high fences in commercial and industrial zones, compared to the existing 6 foot height in other zones.</p>	<p>yes</p>
<p>22. SCC 14.04.020, "Adult group care facility" definition. Amend definition to remove "as a nursing home" so that it is inclusive of other types of state-regulated facilities, including assisted living facilities.</p>	<p>ok</p>
<p>23. SCC Chapter 14.28, Concurrency. Includes Levels of Service (LOS) that need to be replaced with references to the LOS in the Comprehensive Plan Capital Facilities Element so that all LOS are in one place. The timeline in SCC 14.28.110 for special purpose districts to submit capital facilities data to the County is not being followed and needs to be adjusted to make it easier for those agencies to comply. Superfluous definitions and Appendix 1 which doesn't have a section number need to be removed.</p>	<p>ok</p>
<p>24. SCC 14.28, Concurrency. Adopt code provisions to accommodate latecomer agreements consistent with recent changes to RCW 35.91</p>	<p>yes</p>
<p>25. Other amendments to code, as needed, to maintain consistency with Comprehensive Plan policies that may change through the 2016 Update process.</p>	<p>yes</p>

Review 14.38

14.16.300 } as part of thorough review of Rural.
14.16.320 }

14.16.320 } as part of solid + liquid waste dump
14.24.320 } sites in that part of SC where wells are
14.24.330 } common, water courses with oysters + fish
10
are protected.

If public works limits these in 12.15 + their trained personnel are not allowed to manage hazardous waste, how can untrained PD do it

3998 Wind Crest Lane
Anacortes, WA 98221
March 10, 2013

Anacortes Planning Commission
Anacortes, WA 98221

Re: US Dept of Transportation Functional Classification of Public roads - Anacortes Urban area, approved 06-30-2003 (WSDOT Supplement #200399)

Dear Commissioners,

Whatever choices Anacortes makes for its 2016 GMA Comprehensive Plan, transportation routes and mapping updates must be a part of it. Here is a copy of what I am told by County Public Works is the official government public road map of Fidalgo Island. There are major omissions and errors on both sides of the city line. I am told also that there must be a coordinated A/SC process for changes to be acceptable to the Federal Government. Since both local governments have to re-do their Comp Plans by 2016, it seems this is the time to make the corrections.

According to this map, there are no subdivisions east or west of D or A streets, few off 32nd or 41st, and none north of Oakes Ave. There are technical errors, too: a minor arterial goes through Safeway's parking lot, and M street is not important north of 12th. Whether J street is still part of a major collector route, now it is one-way, should be considered, but please keep Heart Lake Road as a major collector. When the Sharpes Corner roundabout is built, and a continuous flow of traffic races past the Campbell Lake/SR 20 intersection at 60 miles per hour, most of us who live west of 20 will be driving through the city to go to east. At that time, both Havekost and Heart Lake roads will be much appreciated by those of us who were taught to not "play chicken" while we drove.

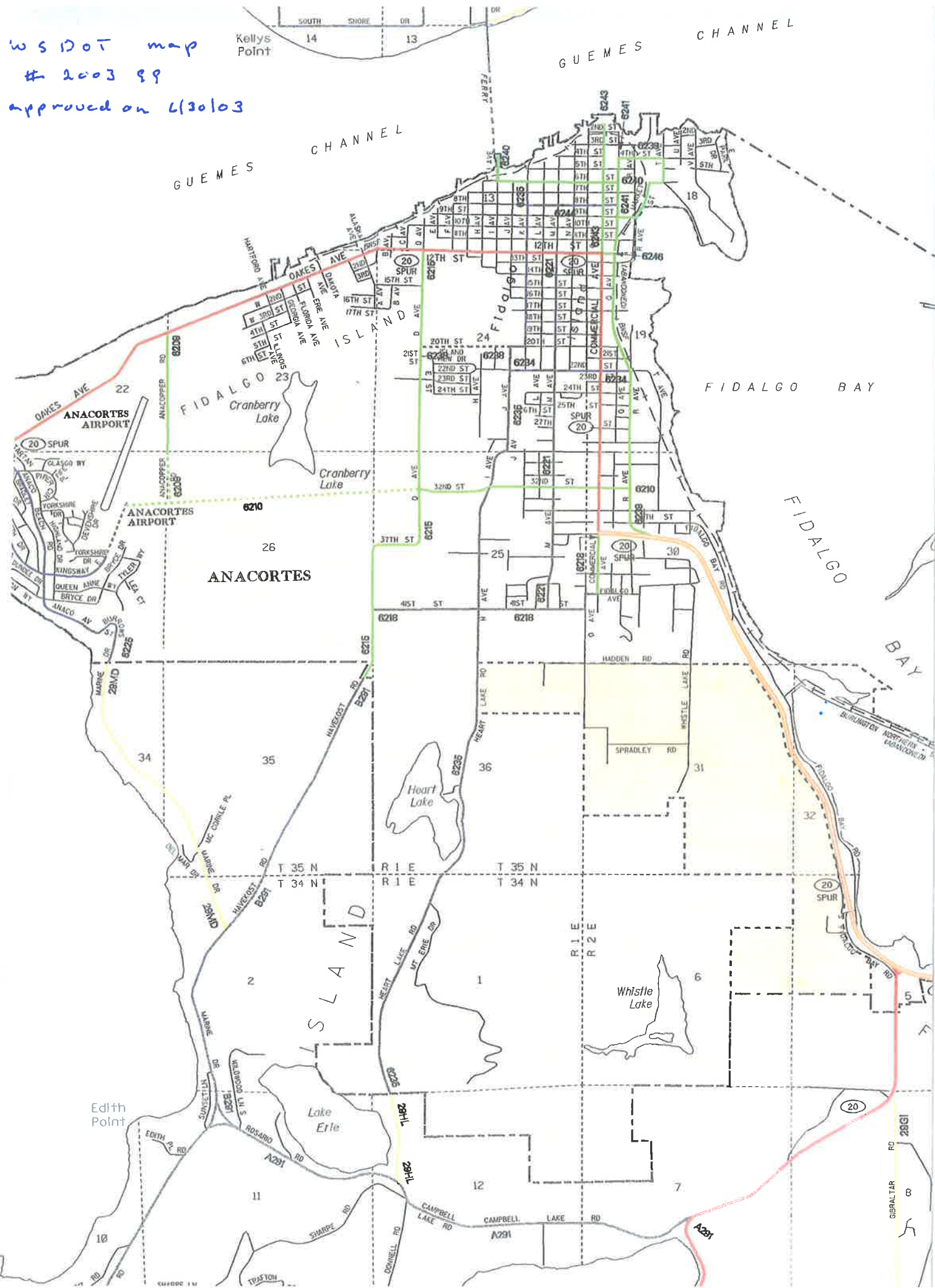
It is difficult to plan for the future unless it is known what currently exists. I hope both governments will cooperate. I will be suggesting county errors and omissions to them later this month.

Sincerely,



Carol Ehlers

WS DOT map
2003 89
approved on 4/30/03



Edith Point

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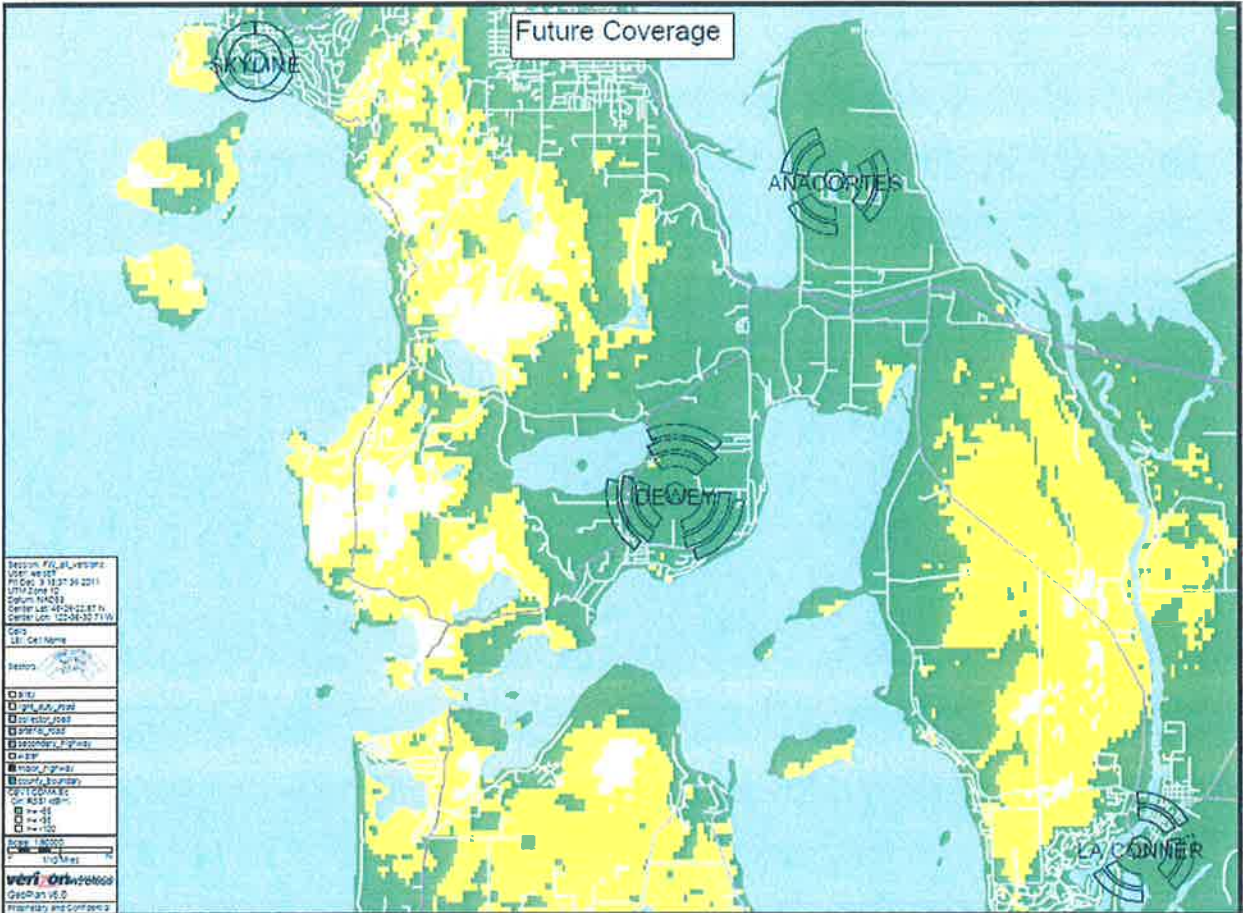
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Exhibit 1B



POPULATION PROFILE

The populations of Island, San Juan, Skagit, and Whatcom Counties have been rapidly growing. In particular, the population of older adults in each of these counties exceeds the growth in other parts of the state.

The overall population in the region grew from 277,565 in 1990 to 355,420 in 2000 (+28%) to 418,485 in 2010 (+18%). The growth for 60+ residents exceeded that of the population as a whole, growing from 51,041 to 61,603 (+21%) to 91,624 (+49%) from 1990 to 2000 to 2010. Each county experienced different rates of change in their 60+ populations, but all experienced growth. The chart below indicates the beginning of the Baby Boomer Age Wave in Northwest Washington State.

County	60+ Population 1990 Census	60+ Population 2000 Census	60+ Population 2010 Census
Island	10,929	13,524 (+24%)	20,540 (+52%)
San Juan	2,811	3,629 (+29%)	5,493 (+36%)
Skagit	16,235	19,271 (+19%)	26,615 (+38%)
Whatcom	21,066	25,179 (+20%)	38,976 (+55%)
Region Total	51,041	61,603 (+21%)	91,624 (+49%)

The change for the 85+ population is included in the chart below:

County	85+ Population 1990 Census	85+ Population 2000 Census	85+ Population 2010 Census
Island	504	944 (+87%)	1,752 (+86%)
San Juan	165	288 (+75%)	452 (+57%)
Skagit	1,191	1,984 (+67%)	2,690 (+36%)
Whatcom	1,754	2,582 (+47%)	3,743 (+45%)
Region Total	3,614	5,798 (+60%)	8,637 (+45%)

A general summary of the population of older adults from the 2010 Census compared with the total for their county and for the region is included in the chart below:

Area	60+ (% of total)	85+ (% of total)	Total Population
Island	20,540 (26%)	1,752 (2%)	79,177
San Juan	5,493 (35%)	452 (3%)	15,824
Skagit	26,615 (23%)	2,690 (2%)	118,222
Whatcom	38,976 (20%)	3,743 (2%)	205,262
Region Total	91,624 (22%)	8,637 (2%)	418,485

Demographic Characteristics

	Island	San Juan	Skagit	Whatcom	Totals	Source
Total Population	79,177	15,824	118,222	205,262	418,485	2010 Census
60+	20,540	5,493	26,615	38,976	91,624	2010 Census
65+	14,439	3,657	18,876	26,640	63,612	2010 Census
60+ Low Income	781 (3.8%)	203 (3.7%)	1,703 (6.4%)	2,728 (7.0%)	5,415 (5.9%)	****ACS 2007-2011 5 yr est.
65+ Low Income	506 (3.5%)	138 (3.7%)	1,133 (6.0%)	1,811 (6.8%)	3,588 (5.6%)	ACS 2011
60+ Minority	1,306 (6.3%)	167 (2%)	1,258 (5%)	1,708 (6.4%)	2,947 (7.5%)	2010 Census
65+ Low Income Minority**	40	11	162	184	397	ACS 2011
18+ Disability	9,919	2,140*	13,014	23,267	48,340	****ACS 2011 *2000 Census
65+ LEP	337	21	499	1115	1,972	****ACS 2007-2011 5 yr est.
Native American Elders	94	17	248	603	962	**ACS 2011
60+ Rural	9,448	5,493	7,718	9,744	32,403	2010 Census
American Indian Tribes*****	None	None	Sauk-Suiattle, Samish, Swinomish and Upper Skagit	Lummi and Nooksack	Six Tribes in the Region	

*Washington State Office of Financial Management, 2008.

**American Community Survey data released in January 2012 for Island, San Juan, Skagit, and Whatcom Counties.

***Census only allows for a count of 65+ low-income minorities and Limited English Proficiency.

****The data for San Juan County are decennial census data because the numbers are too small to report without potentially identifying individuals and so ACS did not include San Juan County data in 2011.

*****All Northwest American Indian Communities have Title VI funding. Sauk-Suiattle and Samish share a grant.

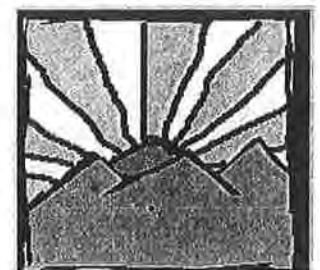


Northwest Regional Council

600 Lakeway Drive, Suite 100
Bellingham, WA 98225

2012-2015 Area Plan Update Public Hearing Draft

Continuing Toward Elder Readiness



number of residents living on designated Natural Resource Lands). This was about one-third of the total County population. By 2025, the rural population is expected to be about 43,000, or less than 30 percent of the total. The rate of growth in the rural area should be lower than the urban rate. The Countywide Planning Policies state that over the 20-year planning period, no more than 20 percent of the County's growth should locate in the rural area. During the period 1995-2004, the rural population increased by about 500 persons per year. As the County and cities' Comprehensive Plan policies and development regulations are implemented, this level of rural growth relative to urban growth is expected to decline. In addition, limitations on water rights and measures to protect critical areas and resource lands may tend to further restrict rural residential development.

"Rural areas preserve historic and cultural structures and landscapes, retain open spaces, protect designated Natural Resource Lands and identified critical areas, and minimize service demands and costs on County government."

The Rural area goals, policies, and land use designation criteria are included in the Rural Chapter, the companion document to the Rural Profile. The land use designations for the Rural Area allow for a variety of residential densities and rural- and natural resource-related businesses while protecting rural character. Several of these designations implement the Growth Management Act's allowance of "limited areas of more intensive rural development," or LAMIRDs, based on 1997 amendments to the Act. LAMIRDs allow greater development than is generally allowed in the rural area, provided that certain limitations are maintained to retain rural character and prevent sprawl. One category of LAMIRD recognizes areas that were already for the most part developed in 1990, when the

Growth Management Act was adopted. These existing residential, commercial, or industrial areas primarily allow infill development, and must be contained within logical outer boundaries to prevent sprawl. Two other types of commercial LAMIRDs – small scale recreation and tourism uses, and isolated small scale businesses – may allow new development provided that development is contained and consistent with the surrounding rural character.

The residential land use designations in the Rural Area are:

- Rural Intermediate (RI);
- Rural Village Residential (RVR);
- Rural Reserve (RRv); and
- Bayview Ridge Urban Reserve (BR-URv).

All lands designated Rural Intermediate and Rural Village Residential

are considered to be part of a LAMIRD that was predominantly developed by 1990 and contained by a logical outer boundary consisting of the "built environment." ** The Rural Village Residential and Rural Intermediate designations reflect areas that were for the most part already developed or platted at land use densities of 1 residence per 2.5 acres, or greater, when the Growth Management Act was implemented. The Comprehensive Plan's Rural Village Residential and Rural Intermediate designation criteria closely follow the GMA LAMIRD provisions because Skagit County was considering its 1997 Comprehensive Plan at the same time that the state legislature was developing the ESB 6094 amendments to the Growth Management Act*

This sentence is entirely wrong - a lie. These areas were platted at 1/4 acre plus after plating was established in 1984. R Villages pre-date that law by at least 50 years.



Deep-seated landslides commonly occur in relatively weak materials. These can include masses in which the rocks themselves are incompetent, such as certain types of clay-rich sediments and volcanics (e.g., some shales and tuffs) or low-grade metamorphic rocks (e.g., phyllite); or in highly weathered rock and saprolite. In other cases, the geologic structure weakens the rock; bedding, joints, and faults commonly act as planes of weakness that can become slide surfaces. Deep-seated landslides in glacial deposits are common in thicker glacial deposits, usually where permeable and impermeable materials are juxtaposed. Impermeable deposits can perch ground water, causing elevated pore-water pressures in the overlying deposits, which can then slide out and downward.

Movement in landslides is usually triggered by accumulations of water at the slide zone, so land-use changes that alter the amount or timing of water delivered to a landslide can start or accelerate movement. If there is an impermeable layer within glacial deposits (a common situation in the Puget Lowland and valleys in the Cascades and Olympics), infiltrating water can be perched on that stratum, then travel laterally for some distance toward a slope. If the water seeps to the surface on a bluff, it can cause instability.

Ground-water recharge areas for deep-seated slides are the lands up-gradient that can contribute subsurface water to the landslide. Because of the likelihood of subsurface water flow along perching layers in glacial strata, recharge areas for glacial landslides may be classified IV-special and require further investigation. In the absence of other information, the recharge area is assumed to be equivalent to the surface (topographically defined) basin directly above the active slide. A more refined estimate of the spatial extent of a groundwater recharge area can be interpreted from field observation of the stratigraphy, logs of wells or boreholes, or large-scale geologic maps.

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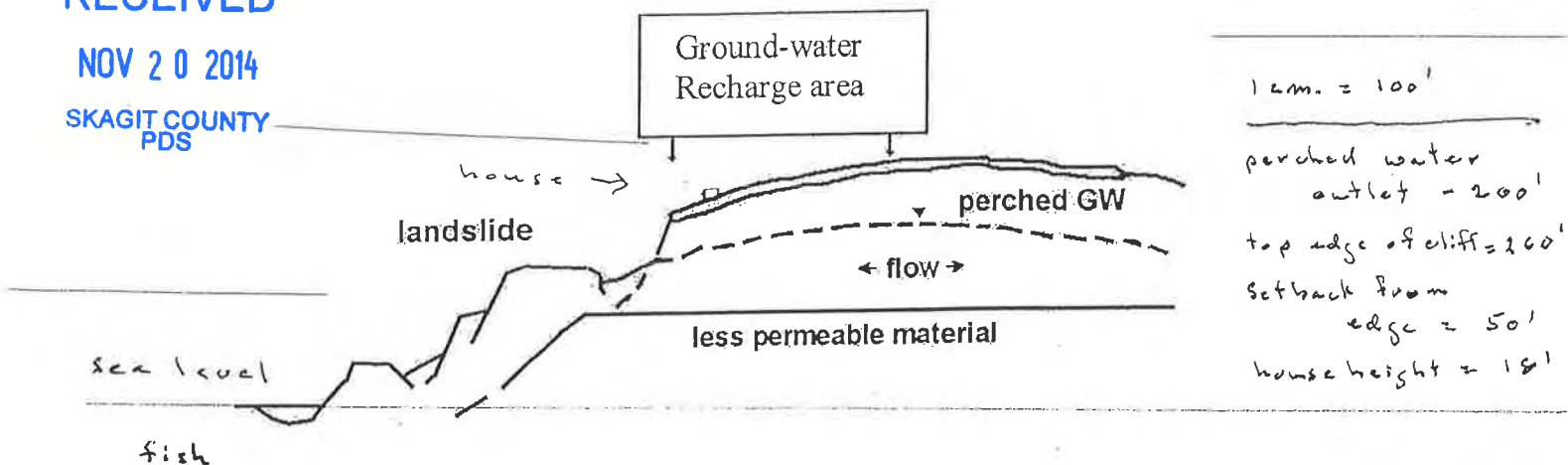
SKAGIT COUNTY
PDS

Figure 12. Ground-water recharge area for a glacial deep-seated landslide.

Many deep-seated landslides occur in the lower portions of hillslopes and extend directly into stream channels; in such situations, streams can undercut the landslide toes, promoting further movement. Such over-steepened **toes of deep-seated landslides** can also be sensitive to changes caused by harvest and road construction. Steep marginal streams and their side slopes can also be subject to debris-flow initiation. Because they are usually in weak materials (further weakened by previous movement), an angle of 33° (65%) is a common threshold value used to identify unstable slopes. On the other hand, deep slides confined to upper slopes may not have the ability to deposit material directly into channels. The ability of landslide scarps and marginal streams to deliver sediment to waters or structures varies with local topography.

From: [Erbstoesz](#)
To: [PDS comments](#)
Subject: Scope of the 2016 Update of the Skagit County Comprehensive Plan
Date: Thursday, November 20, 2014 2:56:31 PM

November 20, 2014

Dear Honorable Skagit County Commissioners:

RE: The Scope of the 2016 Update of the Skagit County Comprehensive Plan

My name is Marie J. Erbstoesz. I have been a resident of Skagit County since 1975 and I live at 217 East Division St.; Mount Vernon, WA.

I understand that Skagit County is in the process of updating the County's Comprehensive Plan. I think it is essential that the Scope of the 2016 Skagit County Comprehensive Plan include the excerpts below which relate to non-motorized components. Opportunities and encouragement for walking and bicycling are important aspects of a healthy county and one in which it is most desirable to live. Public Health publications and news items frequently cite the benefits and importance of regular exercise as a means of improving and maintaining the health of the public. I have a Masters in Health Administration from the School of Public Health at the University of Washington. My training and my professional career in Public Health constantly re-enforce the importance of population health issues. Access to walking and bicycling options are among the excellent ways of addressing some population health issues such as general health/fitness, heart/cardiac issues, obesity, etc.

Scope Excerpts:

b. A pedestrian and bicycle component, as required by RCW 36.70A.070(6)(a)(vii), (amended 2005) and WAC 365-196-430(2)(j). The County's current Transportation Systems Plan has a non-motorized component, and some related policies are included in the Comprehensive Plan's Transportation Element. The review will consider updating the Transportation Element policies to be consistent with the regional non-motorized transportation plan being developed by SCOG.

2. Consider urban planning approaches that increase physical activity. The County did not address this requirement, added in 2005 per RCW 36.70A.070(1) and WAC 365-196-405 (2)(j), in the 2005 Update. The County will review and potentially add to existing policies that address this requirement, including:

a. Policy 2A-6.3: "Concentrate facilities and services within Urban Growth Areas, using urban design principles, to make them desirable places to live, work and play; increased the opportunities for walking and biking within the community...."

b. Also Comprehensive Plan goals and policies on non-motorized transportation, including Chapter 8, Goal A-6, and policies 8A-6.1—6.10.

Thank you for your review and consideration of these comments.

Marie J. Erbstoesz, MHA

Consultant

Health Care Strategic Development and
Management Advisory Services

217 East Division Street
Mount Vernon, WA 98274

Phone 360-336-5896

Email erbst@cnw.com

SCARP

*Skagit Citizens Alliance
for Rural Preservation*

PO Box 762, Sedro-Woolley WA 98284 | 360-856-2290

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NOV 19 2014

SKAGIT COUNTY
PDS

November 18, 2014

Skagit Board of County Commissioners
1800 Continental Place
Mount Vernon WA 98273

Hand Delivered to BoCC office November 19, 2014

re: Comprehensive Plan Update | Scoping Hearing of November 17th

Commissioners:

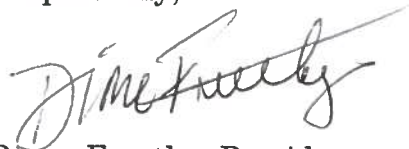
Having viewed the video of the hearing on Skagit 21, we are concerned that Planning & Development Services staff has put the Comp Plan Update on the fast track.

It is abundantly clear that local citizens are not pleased with the proposed update schedule offered by PDS. SCARP believes the lack of trust and confidence in staff has reached a point which demands your support of a community-based approach to the update process.

Our organization is prepared to work with other like-minded groups and individuals to form citizen committees for the purpose of reviewing the Countywide Planning Policies and the County's Comprehensive Plan. PDS input would not be required unless specifically requested by members of the committees.

We hope you will take Ed Stauffer's comments to heart. The original Comp Plan was developed by . . . and still belongs to . . . the people of Skagit County. We have a right to determine our future.

Respectfully,



Diane Freethy, President

Presentation for Proposed Scope for 2016 Comprehensive Plan Update

My name is Gilda Gorr and I have lived at 3225 Old Hwy 99N for about 18 years. We operate a small business that creates no negative impact to our neighborhood or the environment. Our business needed a special use permit before startup which included prior notice to our neighbors of our intentions. About 4 months ago we learned that nearby neighbors had already started preparations for a marijuana grow and processing operation that we learned has no permit or notification requirements from Skagit County as long as it is an outdoor operation in the "Rural Intermediate" zone. This crop's known water requirements in addition to the property being adjacent to Butler Creek (which feeds into the Samish River) is very likely to diminish water capacity and potential contribute new pollution to the Creek and river from the introduction of chickens, ducks and pigs that we are told will be released to roam about the space to turn and amend the soil. This does not seem to fit with the "Clean Samish Initiative".

My point is this: since the passage of I-502, there was no public participation in the county's memo on how marijuana would fit here. The cities all conducted public meetings so that everyone had input on how to implement this. We rural residents are the single largest population group other than Mt. Vernon and our neighborhoods, with current zoning, seem to be a target for this new business. We respectfully request that marijuana activities be included in this new plan update and that current zoning be amended or new zones created to not allow this where primary land use is residential.

Thank you,

Gilda and Bill Gorr

November 17, 2014

Skagit County Board of Commissioners
Ken Dahlstedt
Sharon Dillon
Ron Wesen
1800 Continental Place, Suite 100, Mount Vernon, WA 98273

Re: Proposed Scope for 2016 Update of the Skagit Comprehensive Plan

Skagit County Board of Commissioners:

Thank you for the opportunity to comment on the proposed Scope for the 2016 Update of the Skagit Comprehensive Plan. We write on behalf of the Guemes Island community, as elected representatives of the Guemes Island Planning Advisory Committee (GIPAC). We are pleased that the 2016 Update of the Skagit Comprehensive Plan provides an opportunity to finally move forward with incorporation and implementation of the adopted Guemes Island Sub-Area Plan (GISAP).

We are very much in favor of that portion of the proposed Scope that refers to integrating existing sub-area plans into the County Comprehensive Plan (see proposed Scope, Comprehensive Plan, Item 7). To make this action meaningful, however, we ask that the scope also address development regulations and programmatic actions needed to effectively implement our sub-area plan.

History

GISAP is the result of a 20-year community planning effort that involved extensive research, field testing, professional input from the American Institute of Architects and countless hours of volunteer effort and collaboration. The plan focuses on a number of key issues unique to our island community: protection of the island's rural character and scale of development; management of water resources on the island given our reliance on a "sole source aquifer" and problems of seawater intrusion; and conservation of the rich habitat, shoreline resources and environmental values that help define Guemes Island.

As you know, the Skagit Board of County Commissioners adopted our plan at the end of 2010. However the plan was modified in the final review process to remove almost all the "shalls" in the plan and replace them with "shoulds." We were told that the county would address implementation of the plan through further planning work in the future.

The plan was adopted nearly 4 years ago, but implementation of GISAP has not risen to a level on the County's list of planning priorities (annual work program) to receive attention. We recognize that the County faces fiscal and personnel

constraints, but we ask that the GISAP be included in the 2015 Planning and Development Services work plan, and that any issues not dealt with in 2015 be rolled into the 2016 Comprehensive Plan update so that we can get the GISAP implemented.

Work in Progress

Update of the County's Shoreline Master Program (SMP) has been underway since 2011. Early in 2013, Planning Director Dale Pernula agreed to review and incorporate the shoreline element of GISAP in the SMP update process. We requested that the GISAP standards relating to height, bulk, and scale in shoreline areas be incorporated in the County update, and are pleased to see that these basics are now included in a draft of the SMP. We are continuing to work with Skagit planning staff to resolve discrepancies in the SMP map of environmental designations, and will review the entire plan for consistency with GISAP when it is released for public review.

Additional Steps Needed to Implement GISAP

Soon after GISAP was adopted, County planning staff prepared an "Implementation Matrix" that identifies changes in County regulations and programs that would be needed to implement GISAP. Key implementation steps include adopting Guemes-specific zoning standards for height bulk and scale, as well as finalizing and codifying the draft modified Seawater Intrusion policy. Our committee stands ready to work with county staff to clarify and prioritize County actions needed to implement our plan.

Thank you again for the opportunity to comment on the scope for the 2016 Skagit Comprehensive Update.

Guemes Island Planning Advisory Committee

Nancy Fox, Chair
7202 Channel View Drive
Anacortes, WA 98221

Allen Bush, Vice Chair
Patty Rose, Secretary
Hal Rooks, Treasurer
Michael Brown
Sandy McKean
Stella Spring
Gary Curtis (Emeritus)
Stuart Charles (Emeritus)

Cc Commissioner-Elect Lisa Janicki

From: [Jeraldine Hallberg](#)
To: [PDS comments](#)
Subject: Scope of 2016 Update to Skagit County Comprehensive Plan
Date: Thursday, November 20, 2014 11:24:21 AM

The following are comments on the proposed scope of the 2016 Update to the Skagit County Comprehensive Plan:

1. The update must include the SCOG Non-Motorized Transportation Plan currently under development. This update should be incorporated into the county transportation element and any other appropriate places in the comprehensive plan.
2. The update also must include policies to increase physical activity and to work cooperatively with the cities on measures to address physical activity through urban design, development codes, infrastructure, funding, and any other suitable method.
3. The update should go beyond these two measures and wrap these policies in other plan chapters, where suitable, to assure consistency throughout the document.
4. In these comments, I am reflecting two of my values as follows:

- Physical activity is vital to all ages

I seek physical activity outdoors every day as a way to maintain my health into my senior years. The effect of this is that my medical expenses are less than average and I am able to live independently and help my neighbors and community members. Physical activity has been identified as one way to address childhood obesity and diabetes and other health issues in people of all ages.

- - Government actions can help make it easier, safer, and more attractive to walk or bike in rural and urban areas.

Coordination of trails and other non-motorized facilities between cities, unincorporated urban growth areas, and rural areas is important. The county should play a leadership role in making this happen.

Thank you for your consideration.

Jeraldine Hallberg
6335 State Route 9, Sedro-Woolley, WA 98284
360-856-1220

To the Skagit County Board of Commissioners
Re: Proposed Scope for 2016 Update of the Skagit Comprehensive Plan

Marianne Kooiman
6500 Square Harbor Lane
Guemes Island

I have lived on Guemes Island since 1989 and I was a member of the GIPAC that formulated the draft Guemes Island Sub-Area Plan (GISAP) that was adopted by Skagit County in 2010. I also served as a member of the Skagit County Seawater Intrusion Committee that in 1996 designed the Seawater Intrusion Policy, that is still valid at this time.

The 2010 GISAP is further described as "A Component of the Skagit County Comprehensive Plan". I read in the proposed scope that integration of existing sub-area plans as chapters of the comprehensive plan is listed under item 7; this would finally make that description a reality and also lead to the codifying of our policies.

My personal interests are the environment and specifically groundwater issues, such as seawater intrusion, of Guemes Island.

As the present seawater intrusion policy has been in use for many years, inconsistencies and flaws have come to light, which caused our subarea plan to call for an updated seawater intrusion policy. A draft policy was put on hold in 2012 by Environmental Health due to a lack of funds.

Development Regulations of the Scope indicate a Review of the Critical Areas Ordinance (CAO). Guemes Island has been designated as a category I Aquifer Recharge Area, based on its EPA Sole Source Aquifer status. With the growth of the island population, protection of our groundwater system is of utmost importance.

I mention these two issues as an example why integration of our subarea plan with the comprehensive plan is necessary and long overdue. We invested an enormous amount of time and energy in developing the plan and expect it to be implemented at the earliest possible date.

I thank you for the opportunity to comment on the Scope,

Marianne Kooiman

11-17-14

From: Susan.Krienen@shell.com
To: [PDS comments](#)
Subject: Comments on the scope of the 2016 Skagit County Comprehensive Plan
Date: Thursday, November 20, 2014 2:56:22 PM

My name is Susan Krienen and my address is 12225 Bayhill Drive, Burlington, Wa 98233.
I support having bike and ped planning in The 2016 Comprehensive Plan. It is important for our community to provide healthy access to all residents.
Thank you for your consideration.

Sent from my BlackBerry Wireless Handheld

----- Original Message -----

From: Krienen, Susan G SOPUS-DMW/6
Sent: Thursday, November 20, 2014 02:50 PM
To: 'pdscomments@co.skagit.wa.us' <pdscomments@co.skagit.wa.us>
Subject: Comments on the scope of the 2016 Skagit County Comprehensive Plan

Sent from my BlackBerry Wireless Handheld

From: [Scott Mangold](#)
To: [PDS comments](#)
Subject: Written Comment on Scope of Comp Plan Update 2016
Date: Thursday, November 20, 2014 9:15:11 AM

Skagit County Commissioners,

Three weeks ago, I was shocked to first hear of a proposed gun and ammunition retailer planning to set up shop in the Rural Center of East Edison. This information was quickly confirmed by the land owner and is now common knowledge. I thought, "How could this be, that this type of business would be allowed within a few hundred feet of a Post Office and Pre-School, not to mention the proximity of the public school, Edison Elementary, less than a mile down the road?"

I continued to think of the students and children. We live in a different world than existed in at the time of the last Comprehensive Plan update. The prevalence of school shootings in our country is on an upward trend and is widespread. The citing of a gun store so close to 2 schools, with busloads of kids traveling to and from each day, 180 days out of the year seems ludicrous on many levels. Many of these children are aware of the more recent occurrences of school shootings with Sandyhook and Marysville, WA so close in our history. Two weeks ago there was a shooting threat one student made to another at Edison Elementary. Passing a store full of weapons each day will certainly create an undue level of fear in their developing minds. "Exactly how concerned with our safety are you adults?", they will ask. Allowing this type of business at this location also reinforces the barrage of violent messages that assault our youngest generation. There is strong correlation between the rise and availability of violent video/fantasy games and increased violence in schools. The reality of the consequences of gun violence against people is being diminished.

I began to dig into our Comprehensive Plan, the Skagit County Code, and the County website in general. My awareness was raised immediately. I discovered that the initial application for the permit to remodel the existing residential apartment building into a gun store was filed in May 2014. How was it that the community at large was only now becoming aware of the such a dramatic change to our area? I also learned that the process had been followed and decisions made according to the law, as written, and that this was a zoned and allowable change of use requiring no public notice. I found this to be perplexing. One thing that I noticed though was how much of the Comprehensive Plan, Chapter 3, The Rural Element, cited the term "rural character".

Please understand, I do not oppose gun stores or personal property rights. I believe in and value the rights we all have under the Second Amendment. I know and respect that a great many people in my community own guns for their safety and for recreation. I enjoyed shooting tin cans at the gravel pit with my dad as a young man. In fact, many of my friends and schoolmates took their first gun safety course at Edison Elementary, inside, with their guns. Of course, the school is a posted "Gun Free Zone" now. A different world we live in, yes. One where there ought not be a gun store located so near to these schools. I object to the location, it should be someplace else. Not at the main crossroads of a varied and diverse rural community. Actually, this gun store will directly change the existing rural character in its vicinity. At least in the manner that I would understand the term. However, I didn't write the Plan, so I checked in on the definitions included there.

As I began, many of the uses of the term "rural character" in the Comprehensive Plan discuss the need for conservation, environmental protection, concentrated growth, maintaining open spaces, agriculture, natural resources, and encouraging economic prosperity. Then, I was pleased to see in the Rural Area Characteristics section, under Goal A(c) the requirement to also protect the rural lifestyle by "Maintaining the character and historic and cultural roles of existing rural communities." was listed. There seems to be a lot riding on the words "rural character". The aforementioned goals are all quantifiable. Protecting rural lifestyles by maintaining the character and historic and cultural roles of existing rural communities is not. Especially within the clusters of development in our Rural Element. Agricultural land, Natural Resource land, those maintain obvious historic and cultural traits. Our rural clusters have seen communes, lumber mills, brothels, slaughterhouses, shipping ports, hotels, galleries, bakeries, saloons, and much, much more. Where is the historical line drawn? Who's lifestyle? Which culture? Mine differs from each of my neighbors. Our community is composed of an immense variety of people. We all have our own different perspectives, values, beliefs, history and culture.

My scope of this issue was expanded. This ceased to become a gun store location issue and instead is a community issue. Our rural communities must have the ability to shape themselves as they move through history in a continuum of change. The citizens that you serve must be allowed input as to how their communities develop and change into the future.

For this reason, I respectfully urge you to expand the scope of the current Comprehensive Plan Review for the 2016 Update to include the following proposal:

Reevaluate the Skagit County Code as it relates to the goals of maintaining rural character in the Comprehensive Plan. Specifically the rural zoning designations which cluster development, both commercial and residential. Require that all new development, remodeling, land use changes, etc. are posted publicly and prevalently on location, in the Skagit Valley Herald (or other publication of record), and also on the Skagit County website. Allow for a period of public comment and the option of an Administrative Hearing and Determination should there be legitimate opposition raised. Allow for this regardless of whether the use is an already approved within current zoning code. Allow the people who live in a community to have input on what their rural character is and shall become. Allow for decisions to be made based on "maintaining the character and historic and cultural roles of existing rural communities". Honor the intent of the Comprehensive Plan.

I can't help but wonder what might have occurred had the community been informed of the planned gun store prior to its permit approval. At a bare minimum, there could have been a sound and reasonable discussion with the land owner and business operator to outline community concerns and hear how or if they would be addressed. I believe that this change to current law would benefit all members of our rural element and help to maintain the rural characteristics as specified in the Comprehensive Plan.

Sincerely,
Scott A. Mangold
14083 Gilmore Ave.
Bow, WA 98232

From: [cc.mcguiness](#)
To: [PDS comments](#)
Subject: non-motorized travel
Date: Thursday, November 20, 2014 12:34:38 PM

I am a heavy user of sidewalks, bike paths, infrastructure that supports all non-motorized travel. I want non-motorized issues considered in the comprehensive plan update.

Cindy McGuiness
Mount Vernon resident

From: [McNett Crowl, Elizabeth](#)
To: [PDS comments](#)
Cc: [David Jefferson](#); [Jennifer Johnson](#)
Subject: Comments on Comp Plan Scope
Date: Thursday, November 20, 2014 2:56:37 PM

Liz McNett Crowl

13797 Trumpeter Lane, Mount Vernon WA 98273

Skagit County's Transportation System's Plan, including the non-motorized component and planning approaches that increase physical activity and health,

I am writing in support of the following:

It is timely for an update of the County's **Transportation Systems Plan and Comprehensive Plan's Transportation Element**. The Skagit County Transportation Systems Plan was last updated in 2003 and should contain all required elements for the update including:

- a. A forecast of **all modes** of traffic for at least 10 years, developed in coordination with the Skagit Council of Government's ("SCOG's") update of the regional transportation model and plan linked to population and employment and related land use assumptions through 2036.
- b. A pedestrian and bicycle component, as required by RCW 36.70A.070(6)(a)(vii),(amended 2005) and WAC 365-196-430(2)(j). The County's current Transportation Systems Plan has a non-motorized component, and some related policies are included in the Comprehensive Plan's Transportation Element. The review should consider updating the Transportation Element policies to be consistent with the regional non-motorized transportation plan being developed by Skagit Council of Government.
- c. A multiyear financing plan based on needs identified in the Transportation Systems Plan and Comprehensive Plan Transportation Element, which serve as the basis for the County's six-year street, road or transit programs.

The transportation update must involve coordination with the cities and towns, the Washington State Department of Transportation, and other governmental and quasi-governmental groups through the Skagit Council of Governments (SCOG). The County plan should include all items identified in the draft regional non-motorized plan for consistency. The draft plan has been created based on data and input from the County, local jurisdictions and public, and needs each entity to be responsible for incorporating their part of the plan into their individual Comprehensive Plans and then planning and implementing as they are able.

The County especially needs to plan for the portion of the non-motorized plan that is within the County but provides connections and access between the urban areas as well as rural destinations. About 40 percent of our state's population do not drive, relying on transit and non-motorized options. The health of all residents is impacted by our thoughtful and complete

transportation system with each jurisdiction doing their part.

I support the **requirement for the County to consider planning approaches that increase physical activity**. The language in the scope incorrectly identified only the “land use utilizing an urban planning approach”, when in fact the 2005, the Washington State Legislature amended the Growth Management Act (RCW36.70A.070) to guide city, **county**, and regional staff and **elected officials** to build communities where people find it easy and safe to be physically active. The County has not previously addressed this requirement and should do so now.

The County should review and add to existing policies that address this requirement so that our County makes physical activity a priority and identifies it as such by in the comprehensive plan by requiring that all new building and transportation projects consider the effect of the project on physical activity and health.

I am including a link to the Active Community Environments Toolkit, http://here.doh.wa.gov/materials/active-community-environments/13_ACEtoolkit_E14L.pdf, specifically pages 7-11 and 17-18.

Here is another excellent resource for this Comprehensive Planning update <https://www.planning.org/research/publichealth/pdf/healthyplanningreport.pdf> The issues facing cities and counties, and their neighborhoods and communities, continue to change and become more complex and, at the same time, bring the planning profession back to its roots in promoting public health. As planning has shifted toward sustainability, public health has been identified as a core element of communities that thrive, so cities and counties have begun to integrate health into their comprehensive plans. In addition, the sustainability plan, a new cast of plan that takes a holistic view of natural systems and the human activities affecting them, seems well suited to focus on public health as key component of its policies. As public health concerns increasingly center on chronic disease and safety, specialists and planners realize they cannot afford to operate in isolation any longer. Decisions that leaders have made regarding land use, community design, and transportation have impacted local air quality, water quality and supply, traffic safety, physical activity, and exposure to contaminated industrial sites. These decisions are linked to some of the most intractable public health problems, including adult and childhood obesity, inactivity, cancer, respiratory problems, and environmental justice.

I also believe that the comprehensive Plan updates mentioned here are consistent with the efforts that Skagit County is undertaking through the Public Health Department to develop and implement a strategic health plan for our county. Step up Skagit County and do the right thing in creating a Comprehensive Plan that is “comprehensive” and meets all of the requirements of the update.

Raising the bar for health in Skagit County.

Liz McNett Crowl, Coordinator
Skagit Valley Hospital
Outreach and Development
Healthy Communities
PO Box 1376
Mount Vernon, WA 98273
Phone: 360-428-2331
Email: LCrowl@skagitvalleyhospital.org

Skagit Healthy Communities is a leader in developing and implementing innovative programs in partnership with our community to improve the quality of life and health of our residents by reducing the risk and impact of chronic disease and obesity.

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...(_)/(_)

From: [Roger Mitchell](#)
To: [PDS comments](#)
Cc: [Commissioners](#)
Subject: Written comments on proposed scope of Comprehensive Plan update
Date: Thursday, November 20, 2014 2:28:26 PM
Attachments: [Roger Mitchell 19 Nov 14 - WRITTEN comments on 7-year Comprehensive Plan Update.docx](#)

Please confirm receipt

Please see attached written comments on the proposed scope of the Comprehensive Plan update.

Thank you

Roger Mitchell

ROGER H. MITCHELL
1155 Chuckanut Ridge Drive
Bow, Washington 98232
360.766.8914
rmsendit@startouch.net

submitted via email to pdscomments@co.skagit.wa.us and commissioners@co.skagit.wa.us
(please confirm date and time of receipt)

Board of County Commissioners
Kirk Johnson, Contact Person, Comprehensive Plan Update
1800 Continental Place
Mount Vernon, Washington 98273

19 November 2014

Dear Commissioner Dahlstedt, Commissioner Dillon, Commissioner Wesen, and Mr. Johnson,

This *written* comment expands and augments my verbal comments made on 17 November 2014 regarding the 7-year Comprehensive Plan Update as proposed by County Staff.

The Proposed Update has taken the “Comprehensive” out of “Comprehensive Plan Update”. The Growth Management Act (RCW 36.70A) requires this Update. We’re told that County resources are strained and the Proposed Update reflects an attempt to “limit the scope” and focus on only what *staff* determined was most important. That’s false economy. If a complete review and update are done only once in 7 years then we owe it to ourselves to do it right. Thus far, I don’t believe we’re on a track to do this Update either right or responsibly.

If insufficient county personnel, time, and *our* tax dollars are a problem then *other* things should be dropped or put on hold to refocus the resources on the comprehensive plan update. If making a determination of what to work on, or not to work on, is too difficult then I, and a group of volunteer citizens, will be more than happy to reallocate County resources and provide a blueprint for doing so in 72 hours or less.

The following acronyms are used throughout the discussion, below:

GMA = Growth Management Act (RCW 36.70A)
Update = 7-year required update of the Comprehensive Plan
Proposed Update = the 8 October 2014 *Establishing the Scope of Skagit County’s 2016 Comprehensive Plan Update* document
BoCC = Skagit County Board of County Commissioners
SCC = Skagit County Code
CAC = Citizens’ Advisory Committee

As presented, I oppose the Proposed Update.

Below, I have briefly identified some of my specific concerns and opinions with regard to the Proposed Update and, in each case, I have offered at least one doable, practical, Suggested Alternative. I’m always willing to discuss any of these in greater detail and depth.

1. **The Proposed Update process is upside down.** I oppose staff drafting the Proposed Update in a virtual vacuum. As proposed, the update process is woefully inadequate with regard to sufficient citizen input.

This is **NOT** the staff’s Comprehensive Plan.
This is **NOT** the Board’s Comprehensive Plan.

This is the CITIZENS’ Comprehensive Plan.

Revised Code of Washington (RCW) 36.70A:

- at section 010 suggests growth planning needs to ***“express the public’s interest”***
- at section 020 states goal 11 is to have ***“citizen participation and coordination. Encourage involvement of citizens in the planning process...”***

Suggested Alternative: Citizens, at work sessions with staff, should have determined the content of the Proposed Update. The process should be bottom up. There is still plenty of time to do this – and do it right.

2. **There is no formal Public Participation Plan.** Staff will tell you that a Public Participation Plan exists but it is scattered throughout many different portions of the Comprehensive Plan, SCC, and other documents. Everyone agrees that no such Plan exists all in one place for easy access and review by citizens. As presented, the Proposed Update has an unacceptable level of over-reliance on staff.

Suggested Alternative #1: appoint a small, workable committee (5-7 people) composed of volunteer citizens and one Planning Department staff member and task them with drafting a proposed Public Participation Plan. This task should be completed before any other Comprehensive Plan Update work is done. The Comprehensive Plan Update should proceed only after a proposed Public Participation Plan is drafted, is subject to a public hearing, approved by the BoCC, and implemented.

Suggested Alternative #2: Assign the initial task of drafting Public Participation Plan to a small citizens’ committee chaired by Roger Mitchell, Ellen Bynum, or Diane Freethy. That committee will consult with Ryan Walters and provide a draft Public Participation in 14 days (probably much sooner).

In both Suggested Alternatives, the emphasis will be *less* on ‘reinventing the wheel” and *more* on consolidating and updating the disparate elements of public participation scattered throughout various documents into a coordinated, inclusive, focused Public Participation Plan proposal.

3. **I oppose using the Planning Commission as the Citizen Advisory Committee.** To do so would conflict with SCC 14.08 and, potentially, other statutes. To me, common sense suggests that you cannot have the same group that creates the Update be the same group that ultimately suggests approval or rejection of that same Update.

Suggested Alternative #1: With input from citizens with regard to composition, size, and individual volunteers, appoint a Citizens Advisory Committee.

Suggested Alternative #2: With input and recommendations from citizens, break the proposed Comprehensive Plan amendments and proposed SCC changes into separate, individual tasks and, with input from citizens with regard to composition, size, and individual volunteers, form a specific CAC for each separate task.

4. **The Proposed Update ignores the 15+ year controversy over a Bayview Ridge plan.**

Suggested Alternative: Bayview Ridge needs a zoning classification specific to its special circumstances.

5. **The Proposed Update fails to adequately address forestry.** Forestry helped create Skagit County and remains a key economic factor for the County. Forestry’s needs are not being addressed. Much has changed in the Forestry industry and in forest lands held privately.

Suggested Alternative: A complete and comprehensive review of the needs of the Forestry industry and of private forest landowners should be a part of the Comprehensive Plan Update. The current Forestry Advisory Board, augmented by volunteer private forest landowners, should take the lead in this review and draft proposed amendments to the Comprehensive Plan to be included in the Update.

6. **Skagit County Code needs a complete review and revision.** The Proposed Update is insufficient with regard to a complete Code revision. Everyone knows that this needs to be done. The Code is increasingly complex, fragmented, and in possible conflict with itself and other statutes.

Suggested Alternative: Skagit county code needs a complete review and revision. Yes, this is a laborious task but there are citizens who would willingly volunteer to help with the project and the County should take advantage of that. The Update is the perfect vehicle for us to get this important task underway.

7. **The Proposed Update is essentially silent on water issues facing Skagit County.** Water is the biggest, most pervasive, most potentially detrimental issue facing the County. Water is on of the X required elements mandated by the GMA for Comprehensive Plans.

Suggested Alternative: A major effort should be undertaken to assess the present and future access to water for every citizen of Skagit County, whether that access is by private well, local water associations, or the Public Utility District. This issue is smoldering and has the potential to completely devastate the traditional culture, way of life, quality of life, livelihood, economics, and social relationships within our county. As a priority, The Comprehensive Pan Update should address solutions to the vexing water issues we currently face and those we will face in the near future. We cannot leave our fate up to Olympia.

8. **The Proposed Update does not address the increasingly inadequate and insufficient representation of rural citizens in local government.** Rural residents comprise 48,000 of our county's 117,00 people (41%)% yet they have the least representation of any group of citizens.

Suggested Alternative #1: The Comprehensive Plan Update should include a complete review and revision of the RCW 36.70A.070 (5) Rural Element by a CAC comprised only of rural citizens.

Suggested Alternative #2: A citizens group should identify specific rural geographic groups throughout the County. The Comprehensive Plan should be amended to require that there are quarterly BoCC work sessions held at which each of these rural geographic groups can present and *discuss* concerns, ideas, and suggestions specific to their area.

9. **Inordinate diversion and waste of County resources.** Recently, a significant amount of citizens', staff's, Planning Commission's, and BoCC's time has been spent on review and consideration of the Transportation Improvement Plan, particularly on non-motorized transportation projects like the Cascade Trail proposals. These reviews were an inordinate and unnecessary diversion of important resources. We are not prioritizing County resources well. The Proposed Update does not adequately address these types of issues.

In general, too many County resources are applied to provide opportunities for a very small number people at the expense of addressing real issues with real importance. Paving streets is a better use of taxpayer dollars than is paving sparsely used trails.

Suggested Alternative: The Comprehensive Plan Update should study and address these types of issues and amend the Comprehensive Plan accordingly to prevent such an inordinate waste of both the County's and citizens' resources in the future.

10. **Public comments and expressly stated objections.** County Legal staff has recently advised that, unless opposition is *expressly* stated in a verbal or written public comment that comment is deemed supportive. That is unacceptable.

Suggested Alternative: Skagit County Code, and Skagit County Policies, at the appropriate places in the appropriate documents, should unequivocally, unambiguously, and directly state that a verbal or written comment will be considered in opposition or in support of an issue or proposal *if, and only if*, that statement expressly uses common language and a “reasonable person” test of interpretation of the language used that denotes either opposition or support. All verbal or written statements not expressly using common language of opposition or support shall merely be considered as statements made without characterization of them as being in opposition or being supportive.

11. **I oppose Proposed Change #2, the consideration of urban planning approaches that increase physical activity.** “Urban” planning will be the detriment of Skagit County. We have far more important and critical concerns than government “increasing physical activity” for anyone.

Suggested Alternative: Delete Proposed Change #2 in its entirety from the Proposed Update.

12. **A \$5,000 fee for submitting a Comprehensive Plan amendment is egregious.** A fee of that magnitude is purposefully restrictive of citizen’s guaranteed free speech and is wholly contradictory of, and restricts, the Washington State Constitution Article 1, Section 1 requirement for “consent of the governed”.

Suggested Alternative: At a minimum, the BoCC should use their already existing authority to waive any and all fees for submittal of a proposed Comprehensive Plan amendment.

13. **Overregulation threatens Skagit County’s future.** If we continue the current trajectory of overregulation we will not be able to maintain our current economic base nor be able to attract the types of businesses that will secure our economic future.

Suggested Alternative: Through appropriate revisions, our Comprehensive Plan and Skagit County Code should require in depth analysis of the effects of regulations imposed *prior* to adopting those regulations. There should also be a complete and thorough review of existing regulations with regard to their effect on our economy.

14. **Cost benefit analysis should be required for every proposed project.** Currently, no true cost/benefit analysis is performed on County project proposals or planned actions. It is citizens’ tax dollars that are at risk of being wasted or misapplied if cost/benefit analysis is not performed.

Suggested Alternative: The Comprehensive Plan and related SCC should require a thorough, detailed, true cost benefit analysis be performed for every project and planned action under consideration to determine which projects and planned actions are advisable to pursue.

15. **Project proposals and planned actions lack needs analyses and performance metrics.** How do we know if a proposed project or planned action is truly needed ? We don’t. How do we know if projects and planned actions have been successful ? Currently, that’s anybody’s guess because we don’t actually know. Including needs analysis and performance metrics will provide insight as to what has worked as intended and what has not, giving us wisdom and rational *facts* to apply to the next proposal or planned action.

Suggested Alternative: Through a Comprehensive Plan amendment, SCC should be revised to require needs analysis and performance metrics as primary criteria for project and planned action approvals.

SUMMARY:

Our Comprehensive Plan is the citizens' plan. By design, the Growth Management Act *requires* that the Comprehensive Plan “express the public’s interest”, should have “citizen participation and coordination” and “encourage involvement of citizens in the planning process”. The Washington Constitution *requires* our government to be by the “consent of the governed”. The Proposed Scope and Update is upside down with regard to citizen participation. I trust that the BoCC will address these issues as well as the specific concerns and opinions I have raised, above.

Thank you for your time and consideration.

Roger Mitchell
Bow

17 November 2014 - BoCC Public Hearing on Scoping for the Comprehensive Plan Update

I have three suggestions to make regarding the Comprehensive Plan Update *process*.

1. Citizens' Participation and the Public's Interest.

This is **NOT** the staff's Comprehensive Plan.

This is **NOT** the Board's Comprehensive Plan.

This is the **CITIZENS'** Comprehensive Plan.

Revised Code of Washington (RCW) 36.70A:

- at section 010 suggests growth planning needs to ***"express the public's interest"***
- at section 020 states goal 11 is to have ***"citizen participation and coordination. Encourage involvement of citizens in the planning process..."***

I sincerely trust that everyone here wants to honor the legislative intent of the GMA by ***"encouraging involvement of citizens"*** and having ***"citizens' participation and coordination"*** in the Comprehensive Plan Update and have our Comprehensive Plan ***"express the public's interest"***.

To make citizens feel welcome in the planning process and to maximize their participation I make the following 2 suggestions that I would hope the Board will direct to be implemented:

Throughout the upcoming 7-year Comprehensive Plan update, for each public notice, each document under consideration, each agenda item, each report made by a County employee, each presentation made by a County employee, and each meeting at which citizens are present, that we all

- **Abstain from the use of acronyms.** There should no barrier to any citizen's understanding and participation created by undefined acronyms.
- **Abstain from governmental jargon and "planner speak".** Common language should prevail, thus removing any barriers to citizen understanding and participation.

2. Restrictive Fee for Comprehensive Plan Amendments.

Under normal, day-to-day circumstances I understand the intent of the restrictive \$5,000 fee to prevent capricious submission of amendments. Although not an attorney, I question if such fees would be found to restrict First Amendment freedom of speech.

As I frequently point out, Washington Constitution Article 1, Section 1 calls for "consent of the governed" and it seems wholly inconsistent, to me, that citizens' consent comes with a \$5,000 price tag.

In my opinion, the 7-year Comprehensive Plan Update is a special circumstance and I suggest that the Board use its already defined power to waive all fees to submit a Comprehensive Plan Amendment.

3. Sunshine and Transparency.

I respectfully request that all of us - the Board, staff, and citizens - work together with respect for opposing viewpoints and for alternative ideas. In doing so, I

hope there will be as much sunshine and transparency as possible in the Update process. I would hope that we err on the side of too many, rather than too few, formal opportunities for citizen input and participation. At the end of the Update process I hope everyone will feel that their views, ideas, and suggestions were respected, considered fairly, and, in many cases, incorporated into our Comprehensive Plan. That's what the Legislature originally intended.

Connie Munsey
2411 Skyline Way, #205
Anacortes WA 98221

Dale Pernula, Director
Skagit County Planning & Development
Re: Comments 11/17/2014 for Comp Plan update

Considering some major events that have taken place since the last Comp Plan update, like attempted property takings within the Shoreline Master Program or the pipeline safety setbacks, court decisions resulting in the loss of property tax revenues, a new legal marijuana crop, a bridge collapse and a continued poor economy, I'm a little disappointed the Board of Commissioners is "satisfied with the current Skagit County Comprehensive Plan, Land Use and Zoning Map and Development Regulations." There are citizens here who may disagree. The Board also thinks, that because this scope is so limited, a citizen advisory committee is not necessary – that the 9 volunteers on the Planning Commission can do it themselves - so much for increased public participation!!

I am concerned about priorities here. We continue to read emphasis in this document on pedestrian and bicycle components, despite the fact that common sense dictates those are urban, not rural issues. For 7 to 9 months of the year, you rarely see anyone outside the cities going from point A to point B using "non-motorized" transport. At the same time we claim to be promoting good health by creating bike lanes (with the accompanying ugly road decals through our farm lands), we don't think ahead to prevent the demise of an entire community by addressing marijuana enterprises. Enacting I-502 is, logically, a rural/county issue, rather than an urban one. Our cities took this up head on, **in public**, whereas the County has not and we already have negative repercussions from this inaction.

In short, I have 3 specific requests which I hope will be taken into consideration in this process:

- 1) Until the Skagit economy recovers, please table any and all discussions that are not absolutely necessary. I shudder to think how many hours of irretrievably lost "man hours" have been spent discussing things like TDR's (which the majority of citizens were against) and bicycle paths (which enhance the hobby of a few elites at the expense of everyone else) or the population densities at Bayview Ridge which, according to Exhibit 1 is only predicted to increase by **72**

between now and 2036! *Remember: the Skagit River bridge collapse proved we can still get something major accomplished without talking and/or regulating it to death.*

- 2) Please review what constitutes a “rural intermediate” zone. It reads like a catch all dumping ground for any land uses that don’t fit anywhere else – and provides opportunity for misinterpretation for residents and planners alike, which has already caused unnecessary strife.
- 3) Consider writing a specific code for marijuana operations. There is a potential for enhanced revenue and employment for us as long as the code is written thoughtfully/carefully. This “crop” is well suited to communities with a farm culture, but does not belong in just any neighborhood that might allow backyard gardens because properties there are bigger than the average city lot.

From: [Stephen Orsini](#)
To: [PDS comments](#)
Cc: [Orsini & Stephen Virginia](#)
Subject: Comments to 2016 Comp Plan Update
Date: Thursday, November 20, 2014 1:39:41 PM

Dear Board of County Commissioners:

I am writing to urge inclusion of planning and, yes even the attempt to find funds, to support bicycling and non-motorized transport in Skagit County. The expansion of bicycle friendly lanes on roadways and trails has the benefit health through physical exercise and can reduce, especially when the bicycle is used to commute to work, the production of CO2 with its proven deleterious affect on global warming. Further, such lanes and trails add to the sense of livability for the County which is an attraction to people interested in starting a business in Skagit County. I live in an unincorporated part of Skagit County and find that the encouragement of physical activity, bicycling and walking should not just be left to the County's municipalities.

Particularly please make sure that the following is re-included in the 2006 Update:

"2. Consider urban planning approaches that increase physical activity. The County did not address this requirement, added in 2005 per RCW 36.70A.070(1) and WAC 365-196-405 (2)(j), in the 2005 Update. The County will review and potentially add to existing policies that address this requirement, including:

a. Policy 2A-6.3: "Concentrate facilities and services within Urban Growth Areas, using urban design principles, to make them desirable places to live, work and play; increased the opportunities for walking and biking within the community"

Thank you,

Stephen Orsini
4971 Guemes Island Road
Anacortes, WA 98221

From: [Tim Rosenhan](#)
To: [PDS comments](#)
Subject: Fwd: Comment on the Comp Plan Update - Non-Motorized Transportation
Date: Thursday, November 20, 2014 1:41:44 PM

Tim Rosenhan
Innova Kayak
(360) 707-2855

----- Forwarded message -----

From: **Tim Rosenhan** <tim@innovakayak.com>
Date: Thu, Nov 20, 2014 at 1:40 PM
Subject: Comment on the Comp Plan Update - Non-Motorized Transportation
To: Dale Pernula <dalep@co.skagit.wa.us>, KirkJohnson <kirkj@co.skagit.wa.us>

Hi Dale,

I would like to register a comment on the Comprehensive Plan Update concerning the non-motorized transportation section. Most people like public trails, as we found out in public meetings for the Citizens Committee for Envision Skagit 2060. I have an office at the business park at the Port of Skagit, where they have built 12 miles of trails throughout the complex. In Port surveys of the community their public trails are commonly listed as one of the things people like best about the Port. In the recent public hearing at the Bayview School on the proposed BVR changes to the Comp Plan, much of the testimony was from citizens wanting improved Peterson Road access to the Port trail system.

Public trails are a key component of tourism in Skagit County. Our flat terrain and pleasant open spaces provide a popular location for dozens of running and biking events each year for participants from all over Puget Sound and lower BC. The County has an excellent non-motorized plan that should be approved in consideration of the widespread popularity of trails.

However, the non-motorized Comp Plan section has been getting considerable negative input from Friends of Skagit County (FOSC) and specifically from one of their Board members, Randy Good. Randy, his wife, and Ed Stauffer are the FOSC board of directors. Ten years ago Randy Good was a litigant against the County for their taking "rails-to-trails" funding to create the Cascade Trail from Sedro-Woolley to Concrete. He has been single-minded in his opposition to public trail spending since then.

FOSC's director, Ellen Bynum, has made some outrageous public statements against public trail funding, including her allegation in a July 30th, 2014 letter to the *Skagit Valley Herald* where she accused the County of requesting \$130,772,000 in non-motorized projects. I spoke with SCOG's Transportation Planner, Gabe Philips, about this alleged figure, and he said that the region is "allocated roughly **\$8,586** in TAP funds and \$1,526,547 STP funds annually." The smaller figure is specifically for non-motorized projects, and the larger figure is mostly for motorized projects, but can include non-mo projects like sidewalks on bridges. These actual figures are quite reasonable and even stingy.

I would argue that FOSC's position on non-motorized transportation is far from the

mainstream view in Skagit County, and in fact represents the distorted perspective of one individual obsessed with stopping public trails.

The Comprehensive Plan section on Non-Motorized Transportation should not be gutted in response to such a minority voice.

Cheers,

Tim

Tim Rosenhan
Innova Kayak
[\(360\) 707-2855](tel:(360)707-2855)

Presentation for Proposed Scope for 2016 Comprehensive Plan Update

My name is Lori Scott. My husband and I live at 3351 Old Hwy 99N Burlington in the Alger area. Our property is zoned Rural Intermediate (RI) the primary purpose of which 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 and critical area protection are encouraged.”

Since the last Comprehensive Plan update, Washington State began implementation of Initiative I-502 which allows for producing and processing marijuana. Skagit County Planning Department issued a memo to address where marijuana producers and processors could locate. The memo states “production outdoors and not inside any kind of structure qualifies as “agriculture” which is permitted in many zones, including RI.

Lori and Paul Lindsay, 3431 Old Hwy 99N whose property is adjacent to four other 2.5-5 acre residences submitted a plan to produce and process marijuana to Skagit County in December 2013. Because this was deemed agricultural, no hearings or notices were given to neighbors. The Lindsays were told greenhouse structures would not be permitted but “hoop houses would be permitted provided they are open ended and not permanent. The intent is to allow for outdoor soil-based operations.” Since that time, the Lindsays have erected an 8 ft. farm fence covered in black plastic, installed surveillance cameras around the exterior perimeter (per State requirements) which would suggest concern for crime, and erected greenhouses with enclosed ends which are lighted all night. The Planning Department has notified the Lindsays that the greenhouses are to be removed by 12/4/2014. However, even if they are forced to remove the greenhouses our residential area will remain negatively impacted by the tall black plastic fences which are directly adjacent to our properties, surveillance cameras near our back yards, potential damage to our wells as 12,000 square feet of marijuana is watered and produced, potential damage from runoff and pollution to Butler Creek (a fish stream) which runs adjacent to the grow site and foul odor which emanates from marijuana as it matures.

In the existing Comprehensive Plan, rural character refers to patterns of land use and development in which 1) open space, natural landscape and vegetation predominate 2) that provide visual landscapes that are traditionally found in rural areas and communities 3) that are compatible with the use of the land by wildlife and for fish and wildlife habitat and 4) that are consistent with the protection of natural surface water flows and groundwater and surface water recharge and discharge areas. to name a few of the characteristics..

This new “crop”, by virtue of the requirements placed upon producers by Washington State LCB, make it clearly not “just another agricultural crop”.

Our particular situation is an example of confusion and issues that have occurred and we suggest that this crop should not be grown for profit in a primarily residential neighborhood of 5 acres or less and that the description/ limitations of Rural Intermediate be reviewed and clarified as part of the “scope” for the Comprehensive Plan update.

In conclusion, some cities/ counties in Washington State, have established ordinances limiting production to industrial or certain commercial zones and given the requirements of the WA State Liquor Control Board regarding security requirements of the grow sites, it would seem that further review of appropriate locations, not in primarily rural residential areas is required.

Respectfully submitted,

Lori and John R. Scott

3351 Old Hwy 99N

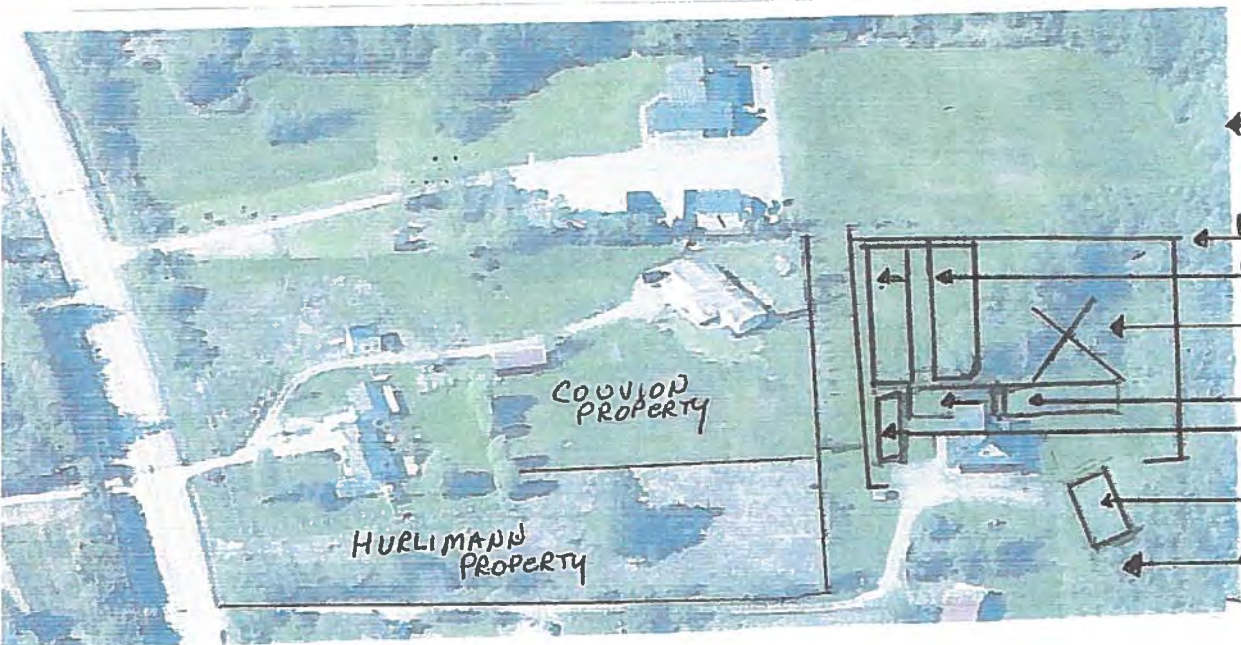
Burlington, WA

360-724-3124



← SCOTT PROPERTY

← LINDSAY PROPERTY

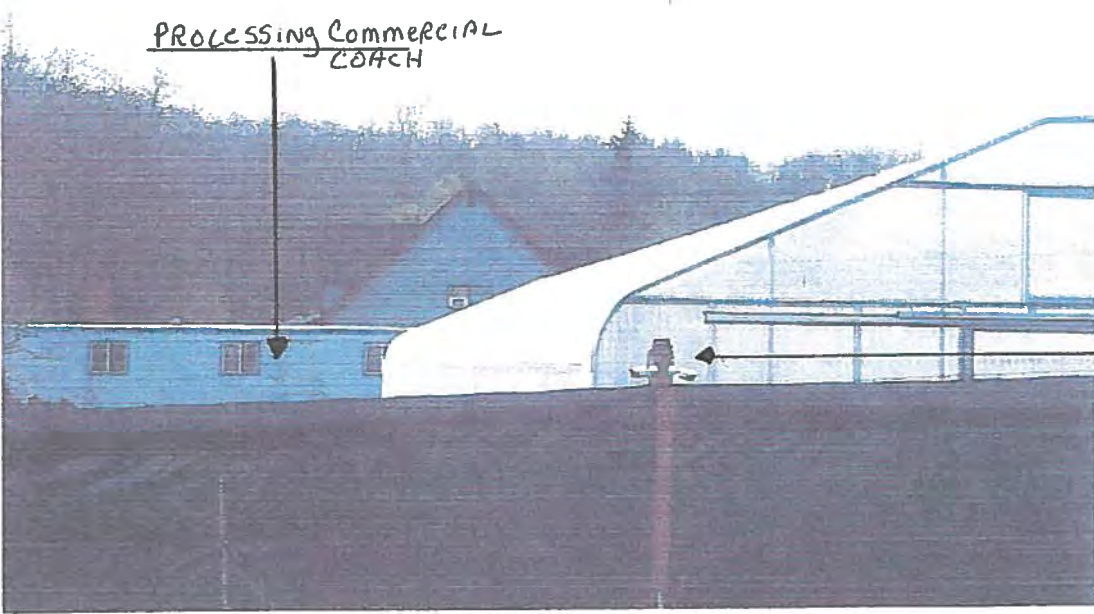


AFTER :

← SCOTT PROPERTY

- 8 FT BLACK PLASTIC FENCING
- GREENHOUSES (2) 28' X 120'
- TREES REMOVED
- (1) PROCESSING COACH
- STORAGE CONTAINER
- SMALL GREENHOUSE
- ← LINDSAY PROPERTY

FROM SCOTT BACKYARD:
NOW



PROCESSING COMMERCIAL COACH

- ← GREENHOUSE
- ← SURVEILLANCE CAMERAS
- ← OVERHEIGHT FENCE BLACK PLASTIC

From: [Paul Sherman](#)
To: [PDS comments](#)
Subject: Bike commuting
Date: Thursday, November 20, 2014 1:19:32 PM

I live near Deception Pass and regularly ride to work in Anacortes, day and night, 11 months of the year. I also am a recreational cyclist and ride throughout Skagit, Whatcom and Snohomish counties. We also take regular bike trips to E Washington. My main concerns to improve bicycle safety and enjoyment are:

1. The unbearable discomfort of chip sealed roads
2. Lack of bike lanes and safe shoulders

I would appreciate anything you can do to improve these two concerns. Thank you,
Paul Sherman

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Staying active is key to healthy living

Paul Sherman, P.T.
Sherman Physical Therapy
www.shermanphysicaltherapy.com
1813 O Avenue
Anacortes, WA 98221
360-588-8075

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From: [Paul Sherman](#)
To: [PDS comments](#)
Subject: Follow up to my email
Date: Thursday, November 20, 2014 1:22:33 PM

I just sent an email and wanted to make sure you know that it is regarding "The Scope of the 2016 Update of the Skagit County Comprehensive Plan" My name address is below.

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From: [Andrea](#)
To: [PDS comments](#)
Subject: Skagit Co. comp. plan
Date: Wednesday, November 19, 2014 4:45:51 PM

The current scoping proposal for Skagit's Comp Plan, I think, leaves the "average" Skagit Co. citizen without all the necessary information; and it should be in a format that is easy to understand. Some of the codes seem incorrectly stated, and other information is so involved or convoluted that not many people would want to take the time to check everything out.

Has the mineral overlay ever been addressed as to the criteria for the selection process – who owns the mineral rights, etc.?

And, now we have the water fights. Any real plans?

Being a long-time champion of keeping our farmlands intact, I hope that "no net loss" of those is still in the picture. Farmland keeps getting whittled away; and since 1940, we've lost about ½ of it, yet since that time the county's population and the world's population has tripled. When do the cities have to give up anything, such as expansion? It's always the resource lands that are threatened. We need these lands.

We need a balance of our natural resources, and meaningful habitat, as everyone uses them or enjoys their bounty at one point or another. Is more habitat needed to save the fish or to "sell the fish?" One resource should not out-weigh another.

Skagit County is not an urban area, nor should it be. We don't need more people to chip away at our resource lands – some of which excel here because of soil, water, and weather that is on par with other, vanishing, valuable resource lands globally.

We need relevant, "ordinary" citizen input to review and comment on their quality of life here in order to create a relevant and meaningful plan.

Thank you for the opportunity to comment.

Andrea Xaver