

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Wednesday, April 10, 2013 8:45 AM
To: Debra L. Nicholson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Tuesday, April 09, 2013 11:45 AM
To: Planning & Development Services
Subject: PDS Comments

Name : William Dietrich
Address : 11660 Marine Drive
City : Anacortes
State : WA
Zip : 98221
email : williamdietrich@comcast.net
Phone : 360 5880118

PermitProposal : UGA expansion by Anacortes Comments : I am writing in opposition to the request by Anacortes to expand its Urban Growth Area to include 11.15 acres south of Stevenson Road. The city's intent, which is to provide for industrial expansion, is the wrong project in the wrong place at the wrong time.

The proposed expanded UGA is between the largest heron rookery in the nation and a salmon estuarine recovery area in Turner's Bay. It is on a neck of land separating the important biologic incubators of Padilla, Fidalgo, and Skagit bays and would directly conflict with recovery projects by the Salmon Recovery Board and Skagit Land Trust.

While the city is seeking to divorce consideration of this UGA expansion from the project that prompted it, I believe the commissioners would do Skagit County a disservice by not considering the wider planning implications of this change. The ultimate intent is to allow development of a bottling plant of up to 1 million square feet - the size of an airplane assembly plant - and adjacent rail yards to service it. The question then is not just how redrawing boundary lines might affect these important ecological reserves, but how this intended development would change the ecological and economic character of the county. Does Skagit County want this development and, if so, where is the best place for it to be?

I believe this bottling plant is a bad idea, but even if allowed, why put it in an environmentally sensitive area on an island. A plant in the Bayview Industrial area or adjacent to Interstate 5 and major rail lines would make far more geographic sense, and could still be served by Anacortes water. At stake, then, is the vision and logic for future Skagit County industrial development. For the county as a whole, does this UGA expansion make sense? Or could this industry be located elsewhere?

We should not be ignoring environmental realities in order to place development primarily to benefit one taxing district over another.

Anacortes is proposing to "balance" this misguided expansion of tis UGA by taking Fidalgo Bay shorelines out of industrial and commercial development. While I support this idea, the wetlands in question are not suitable for development anyway. This change should not be an excuse to make a planning mistake nearby.

Anacortes already has underused industrial lands, and railroad expansion by the nearby refineries is putting pressure on the ecosystems of Padilla and Fidalgo Bays. Wrong place, wrong time.

From Host Address: 67.168.71.170

Date and time received: 4/9/2013 11:42:16 AM

3124 Dakota Dr

Mt Vernon, WA 98274

April 12, 2013



CC: Hammons

Skagit County Board of Commissioners c/o Linda Hammons

1800 Continental Pl

Mount Vernon, WA 98273

Dear Commissioners:

Re: Anacortes UGA Expansion Application Issues

I concur with the arguments below and urge you to defer to 2014 consideration of the proposed expansion as part of the County's General Comprehensive Plan update.

Anacortes UGA Expansion Application Issues

I. The County Staff erred when it categorized the Anacortes UGA Expansion application as NON-PROJECT SPECIFIC.

A. If the County deems that the current Anacortes UGA Expansion petition is a non-project process and not about Tethys, the Comprehensive Plan process will be fatally flawed because the city's application is specifically about the specifically about the Tethys bottling plant.

1. The UGA Expansion Application Still Contains the Tethys Language

2. Since an amendment to remove both the Tethys Language (32%) and the Samish 'land swap' language (39%) is a substantial change, the County should deny the City's application and require the City to submit a new amendment next year.

B. A non-project process will deprive Skagit County residents of the right to participate in a massive development with countywide adverse impacts, which will affect Skagit County residents for generations to come.

C. County Codes Requires a Detailed Development Proposal for a Rezone Application

1. The 11 acre will be rezoned from Rural Reserve (RRv) to Anacortes UGA Development District (A-UD).

D. From the very beginning, the UGA Expansion Application has always been about Tethys.

1. Tethys paid the application fees for the UGA Expansion Application

2. The City of Anacortes billed Tethys Enterprises for the consultant's costs to prepare the City's Response (the E.D. Hovee memo) to the County.

E. Anacortes Staff Reports to the Anacortes City Council mention Tethys as the justification for the UGA Expansion for four different City Council meetings.

II. The Proposed 'Zoning Swap' Sets a Bad Precedence

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1. Will have a Statewide impact
2. Will discourage the Growth Management Act's goal for long term planning and Encourages spot zoning.
3. Skirts the requirement to GMA requirement to demonstrate need.
 - a. Municipalities can bypass the GMA requirements (such as population forecasts and acreage calculations) to justify their UGA expansion.
 - b. The City Council must amend the Anacortes Comprehensive Plan before Skagit County amends its Comprehensive Plan.

III. Turners Bay Marine Estuary

A. Jurisdictional Conflicts

1. Skagit County Shoreline Master Program shoreline protections.
2. City of Anacortes Shoreline Master Program shoreline protections

B. Environmental Impacts on the recently restored marine estuary, which cost \$670,000

IV. Tethys Rail Yard

A. The land requirements for the Tethys bottling plant's rail yard, which is required for the 100-unit water trains, have never been identified.

B. A complete site plan for the 1 million sq-ft bottling facility has never presented. Tethys statements indicate that a complete site plan would require land in excess of 40 acres. The newly proposed Sunland Topsoil site is 30 acres and the UGA Expansion land is 11 acres which comes to a total of 41 acres.

C. Local newspapers have interviewed Steve Winters, the Tethys CEA and attended presentation by Mr. Winters. Their articles have included the following statements by Mr. Winters

:

1. "We definitely plan to use the property in the UGA expansion," he said. "It could be used for anything. It could be for rail transportation staging or it could be used for the building."
2. "Foremost issue is obtaining a parcel of property proximate to rail that could serve our needs There are a number of landowners south of the refineries that may work as well, but the act of herding all of those owners into making a 40 to 50 acre parcel"
3. Most of the sites down there (Everett) were in kind of the 35- to 40-acre range, which really limited our ability to do rail transportation.

V. Catch 22

A. If it's a non-specific project then the UGA Expansion can and should occur in 2014 as part of the County's general Comprehensive Plan Update.

1. To be non-project specific, the original application should be withdrawn and an amended application submitted for the 2014 Full Comprehensive Plan Update.

B. If it's a specific project application that's specifically about the Tethys bottling plant, County Code requires a Detailed Development Proposal

Sincerely,


Gene DiLabio

3124 Dakota Dr
Mt Vernon, WA 98274
April 12, 2013



Skagit County Board of Commissioners c/o Linda Hammons
1800 Continental Pl
Mount Vernon, WA 98273

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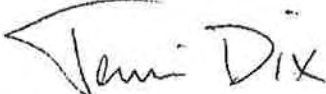
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Sincerely,

Terri Dix



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My Name: Andrea Doll

1319 8th St.

Anacortes, WA

These comments are provided on behalf of myself, Ross Barnes and Evergreen Islands

The Board of Commissioners should NOT docket this petition because it does not meet the criteria and process as stated in the Skagit County P&DS docketing recommendation March 25.

I will address Criteria 4 and 5

According to Criteria 4 a proposed amendment cannot contain legal or procedural flaws that would prevent its legal implementation

According to Criteria 5 the proposed amendment must conform to the submittal requirements of Skagit County Code 14.08 and other applicable codes.

To be docketed, a UGA expansion petition must meet the requirements of SCC 14.08.020 7 REZONES Which includes the requirement of a "detailed development proposal that is consistent with the applicable designation criteria"

AND Anacorte's petition does request a rezone from RRV to A-UD to LM1.

In the revised petition of January 23, E.D. Hovee removed the "detailed development proposal" from the original application. Therefore the revised petition does not meet the requirement of the applicable code.

When Skagit County instructed Anacortes to remove all references to and discussion of the required "detailed development proposal" it created a fatally flawed petition. Skagit County continues to make this procedural error when it instructs all parties to ignore the clear requirements of the applicable County Code

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Therefore we are looking at a petition that does **not** meet code and there is a **flawed review procedure.**

To continue:

An UGA petition must meet the requirements of SCC 14.08 (4) b ii and SCC 14.08 020 5 b iii and iv

Hovee has specifically disavowed the applicability of these mandated code sections saying that this analysis will apply in future GMA comprehensive plan updates.

~~Hovee states that the current position is instead presented as some kind of land swap, within the existing Anacortes UGA allocation of industrial/commercial land. However SCC 14.08 does not contain such a provision for justifying a UGA expansion. Swaping is not an allowable justification~~

By ignoring the clear code requirements for a rezone petition and by disclaiming application of other mandated code sections, Anacortes and Skagit County have created a situation analogous to a prior attempt to expand the Mt. Vernon UGA that was overturned by the Western Washington Growth Management Hearings Board in case number 05-2-0012. The Board disallowed the type of ad hoc speculative UGA expansion that is, in fact, proposed in Anacortes' revised petition, **where no specific need or project is presented as justification for the expansion.**

~~In fact HOVEE on page 33 shows that Anacortes still has 272 acres of available industrial and commercial land, including 169 acres of LM1 zoning.~~

By failing to provide the required "detailed development proposal" Anacortes has failed to show that the existing industrial zoning is insufficient to accommodate some speculative unidentified future development in the 1 or 2 years before the UGA is revisited in the mandated 2014 comprehensive plan update.

I urge the County to not docket this petition until such challenges are resolved.

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Skagit County Commissioners
1800 Continental Place
Mount Vernon, WA 98273

April 9, 2013


Dear Commissioners Dahlstedt, Dillon, and Wesen,

Fidalgo Island's extraordinary one-of-a-kind wildlife habitats need your protection. Our Great Blue Heron heronry is called a "Habitat of Significance" because of its size and its vulnerability! The heronry is adjacent to Padilla Bay's National Estuarine Reserve which is the only one in Washington State! Wetlands, complicated hydric soil, the estuarian stream and salt marsh in the salmon recovery area at Turner Bay, feeding areas: all these habitats need your protection. Because it would destroy any opportunity for these protections, please do NOT allow this UGA.

I concur with statements presented by Dr. Tim Manns, Dr. Ross Barnes, ^{Vernon Lauridsen,} Sandra Spargo, Ursula Mass, and Tom Glade, ^{Evergreen Islands} all of whom state excellent reasons for you to deny this UGA expansion.

Furthermore, to make this hearing a non-project-specific hearing instead of a Tethys-project hearing is like having my clothes standing here without my human person inside them with a corresponding inability to speak. This UGA expansion has always been about Tethys. We need a Determination of Significance, EPA and EIS studies to be made, and ample opportunity for public comments.

Please do NOT allow this UGA permit to go through. Just say NO!

thank you,

Phyllis Dolph
2320 26th St.
Anacortes, WA 98221

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cc: Hammons

Skagit County Board of Commissioners
c/o Linda Hammons 1800 Continental Place
Mount Vernon, Washington 98273

April 12, 2013

Dear Commissioners Dahlstedt, Dillon, and Wesen,

Skagit Land Trust is writing to comment on the Anacortes UGA Annexation Petition.

Skagit Land Trust (the Trust) owns a 3.5-acre property on March Point approximately 1/2 mile from the proposed annexation and 1200 ft. from an abandoned railroad corridor that may be re-introduced for rail service to this annexation (see attached map).

This property is home to our state's largest Great Blue Heron nesting site (called a heronry or colony). This winter, 398 nests were counted on the Trust's property. Neighboring lands also support nests. It is estimated that there are approximately 500 active nests in the March Point Heronry. Due to loss of their habitat, Great Blue Herons have been consolidating into large colonies. There are now five mega-colonies in Puget Sound. The March Point colony is the largest and most established. The importance of the March Point Heronry as a breeding center for Puget Sound herons cannot be overstated.

Although each heronry is different, it is documented that the herons are impacted by loss of their nesting habitat, buffer areas, feeding grounds and flyways. Nesting herons are also disturbed by and have been known to abandon nesting sites due to the introduction of novel sounds and lights nearby or overhead. Colonies will sometimes be abandoned permanently if these activities persist. The proposed UGA expansion has the potential to increase growth in the area, cause disturbance and/or change the landscape/habitat near the heron colony. Therefore, potential direct and indirect impacts to the heronry must be analyzed and understood pursuant to WAC 197-11-060 (4).

Due to the importance and rarity of this heron mega-colony, Skagit Land Trust asks the County to give consideration to the potential for significant impacts to the heronry in your threshold determination for SEPA. We also request that the heronry be considered, and that we be kept informed, in all future studies concerning the proposed UGA expansion and potential uses.

Sincerely

Molly Doran
Executive Director

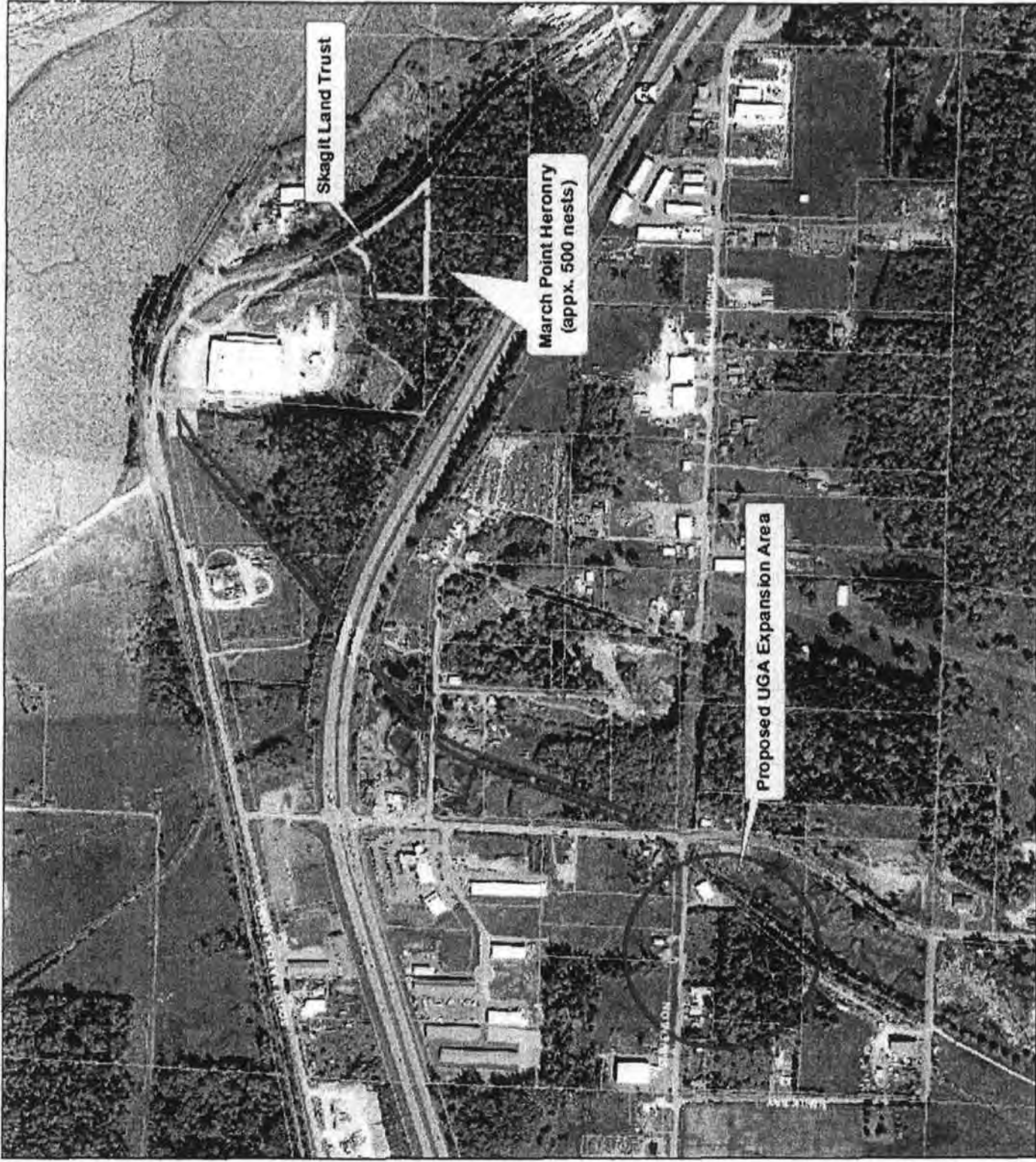


P.O. Box 1017, 325 Pine Street, Suite B, Mount Vernon, WA 98273 Voice 360.428.7878 Fax 360.336.1079

www.skagitlandtrust.org



March Point Heronry Conservation Area



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Data sources:
Aerial from Skagit County 2011 SD
Parcel data from Skagit County GIS 2009

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Monday, April 15, 2013 8:32 AM
To: Debra L. Nicholson; Dale Pernula; KirkJohnson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Saturday, April 13, 2013 10:25 PM
To: Planning & Development Services
Subject: PDS Comments

Name : Peggy Doyle
Address : 9991 Dan Street
City : La Conner
State : wa
Zip : 98257
email : doulaarts@juno.com
Phone : 360-466-5521

PermitProposal : Anacortes UGA Expansion Proposal Comments : I wish to register my opposition to the proposed Tethys water bottling plant. Please do not allow the City of Anacortes to expand its Urban Growth Area so far out into the county. There is nothing urban about this proposed area and in fact it's wetlands have just recently been restored. This proposal appears to be a gross neglect of the county Growth Management Act and the Skagit County Master Shoreline Program shoreline protections. Please do not grant this expansion for this particular project.

From Host Address: 24.113.13.40

Date and time received: 4/13/2013 10:20:46 PM

LAW OFFICES OF
SUSAN ELIZABETH DRUMMOND, PLLC

5400 Carillon Point, Bldg. 5000, Ste. 476
Kirkland, Washington 98033

(206) 682-0767
susan@susandrummond.com



April 15, 2013

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

RE: Docketing of Anacortes' Ten Acre Urban Growth Area Revision

Dear County Commissioners Wesen, Dahlstedt, and Dillon:

This firm represents the City of Anacortes with regard to the City's 10.45 acre UGA revision proposal.¹ The City is requesting that the County docket the proposal for further review. This correspondence addresses the County's five docketing factors, which are the only criteria the Board considers at this stage of review. The City asks that the County follow the recommendations of the County Planning & Development Services Department and the County GMA Steering Committee, and docket the proposal.

1. Background

The City is proposing a UGA revision, coupled with a "land swap" which sets aside an equivalent amount of land for environmental protection.

The City has proposed the revision because the City's industrial and commercial land supply is inadequate. GMA requires that this concern be addressed. GMA has numerous planning requirements implementing the statute's economic development objective.² A core requirement is to designate adequate land for commercial and industrial development.

¹ Expansion as originally proposed included 11.15 acres. At property owner request, a .7 acre parcel has been proposed for removal. The other property owners of the parcels proposed for UGA inclusions signed the application.

² RCW 36.70A.010, see also RCW 36.70A.020(5).

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Counties and cities that are required or choose to plan under RCW 36.70A.040 shall ensure that, taken collectively, adoption of and amendments to their comprehensive plans and/or development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth, including the accommodation of, as appropriate, the medical, governmental, educational, institutional, **commercial, and industrial facilities related to such growth, as adopted in the applicable countywide planning policies and consistent with the twenty-year population forecast from the office of financial management.**³

GMA also includes an economic development goal, a comprehensive plan economic development "element" requirement, a requirement for urban areas to include sufficient capacity for commercial uses, and county-wide planning policy requirements to plan for commercial and industrial growth.⁴ To address these economic development requirements, County-Wide Planning Policy 1.1 identifies commercial and industrial land acreage to be allocated to the City. The City has less than half the vacant land allocated.⁵ This constrains economic development and presents a GMA planning concern.

[T]he City has a *continuing and growing deficit of commercial and industrial employment land*. Anacortes can find no documentation that the 588 acres of vacant industrial and commercial [acres] identified by CPP 1.1 for Anacortes was ever actually allocated and designated. This deficiency alone would provide a basis for increasing the City's employment land inventory to match what was previously approved by Skagit County.⁶

Further exacerbating this issue is the lack of large parcels. For example, the largest single vacant LM1 designated property is less than 20 acres in size. The result is that "[a]ny industrial uses requiring greater land area would need to assemble two or more adjoining vacant properties."⁷

³ RCW 36.70A.115, emphasis added.

⁴ RCW 36.70A.020(5); RCW 36.70A.070(7); RCW 36.70A.110(2) (cities must have sufficient commercial acreage); RCW 36.70A.210(3)(g) (county-wide planning policies required to address "countywide economic development and employment, which must include consideration of the future development of commercial and industrial facilities....")

⁵ Anacortes UGA Boundary Modification Petition, Supplemental Information Submittal, E.D. Hovee & Company, LLC, pgs. 32-33.

⁶ *Id.*, pg. 37.

⁷ *Id.* at pg. 33.

In addition to the inadequate commercial and industrial land base, the County is struggling with an unemployment rate of 10.3%.⁸ And, there is a need for family-wage employment opportunities, with County median hourly wages and annual wages lagging behind state averages.⁹ The proposal would allow for industrial uses which can help address both the land deficiency and employment challenges.

The proposal also incorporates voluntary mitigation. This mitigation results in acreage equivalent to that being added to the UGA being re-designated from industrial use to public use. Properties proposed for use as mitigation include parcels currently designated for industrial use although today they are unsuited for it due to ecological constraints. The mitigation is voluntary, but the City is committed to it. And, as addressed during public testimony, and in the City's application materials, the properties proposed for inclusion are surrounded by lands designated for industrial use which can be adequately served by municipal services and infrastructure.

In sum, with the proposal, necessary commercial and industrial uses are planned for exactly where they should occur, and consistent with GMA.

2. Docketing Criteria

At this stage, the merits of the proposal are not before the County. The only question is whether the proposal will be docketed. The County considers five factors in determining whether to docket a proposal. All five factors are met.

2.1 Resources to Review Proposal. *"The proposed amendment, in light of all proposed amendments being considered for inclusion in the year's docket, can be reasonably reviewed within the staffing and operational budget allocated to the Department by the Board."*¹⁰

As set forth in the County Planning & Development Services Staff Report, the Department has sufficient staffing and budget resources to review the proposal. This criterion has been met.

⁸ Unemployment figures are from the State Employment Security Department. Compare the County unemployment rate with the state-wide rate, seasonally adjusted, of 7.5%, or 8.2%, if not adjusted (preliminary, February data).

⁹ State Unemployment Security Department figures identify County 2010 hourly rates lagging behind state-wide median wages, and County average annual wage in 2010 being \$37,177 compared to the state average of \$48,519.

¹⁰ SCC 14.08.030(3)(a).

2.2 No Additional Revisions. *"A proposed amendment, to be adopted, would not require additional amendments to the Comprehensive Plan or development regulations not addressed in the petitioner's application, and is consistent with other goals, objectives and policies adopted by the Board."*¹¹

The City's proposal outlines the plan and zone designation revisions required to implement it. Development regulation revisions are not required. The proposal is limited to just over ten acres, and, as addressed above and in the City's submittal materials, will have significant economic benefits, and help address the City's commercial and industrial lands deficit.

2.3 No Other Review Cycle. *"A proposed amendment raises policy, land use, or scheduling issues that would more appropriately be addressed as part of an ongoing or planned work program, or as part of a regular review cycle."*¹²

There is no other review process for considering the City's proposed UGA expansion. The 2002 Framework Agreement between the cities and County identifies the County review process. Consistent with the Framework Agreement, by docketing the proposal, the County would be adhering to the process the cities and County agreed upon a decade ago for addressing UGA revisions.

2.4 No Legal or Procedural Flaw Prevents Implementation. *"Some legal or procedural flaw of the proposal would prevent its legal implementation."*¹³

The City is proposing a limited UGA revision. The County GMA Steering Committee, which is composed of the mayors from the cities within the County and the three County Commissioners (who abstained from the recommendation), fully supported docketing. The Steering Committee found no legal or procedural flaw which would prevent the proposed revision. County rezone criteria for a specific development were addressed in the application although not required for a non-project proposal, and the "land-swap" mitigation is not an application requirement, so questions on the acreage amounts cannot present a legal impediment.

A "legal or procedural" flaw is one which could make a decision on the proposal subject to reversal on appeal because a requirement or procedure would be violated. Incorporating voluntary mitigation into a UGA revision proposal and describing the rezone in **both** project and non-project terms not only presents no legal flaws, but in fact goes above and beyond County requirements for applying for a UGA revision.

¹¹ SCC 14.08.030(3)(b).

¹² SCC 14.08.030(3)(c).

¹³ SCC 14.08.030(3)(d).

**2.4.1 The "Land Swap" Mitigation is Voluntary:
It is Not an Application Requirement**

The City is proposing to change the designation of property inappropriately designated for industrial and commercial use. The acreage amount would be equivalent to that being proposed for UGA inclusion. As public comment questioned the acreage figures presented, correspondence from the City Planning, Community & Economic Development Department, dated April 15, 2013, provides clarification on both the acreage and properties proposed as part of this mitigation. Any error in calculating the acreage cannot present a legal or procedural flaw for one reason; the mitigation is voluntary.

This mitigation for a UGA revision is not legally or procedurally required. The City could have submitted its application without any mitigation. However, this is mitigation which the City voluntarily proposed and committed to. While the County may condition its ultimate decision on inclusion of such mitigation, the County does not require an application for UGA revision to include such mitigation. And, GMA contains no such requirement. Due to the City's commercial and industrial lands deficit, as addressed in the E.D. Hovee & Company, LLC analysis, the proposal requires no mitigation. As such, the City could entirely remove the mitigation from the proposal, and there would be no legal or procedural flaw.

**2.4.2 The City Presented Rezone Information for both
a Non-Project and Project Proposal**

The proposal is a non-project proposal because the City is the applicant and will not be developing the area proposed for UGA inclusion. UGA inclusion is being requested regardless of the ultimate developer. Consequently, to the extent the County Code requires development specific information for a rezone proposal, such criteria do not apply here. Nevertheless, the City provided information to address both a non-project action, and a project-specific rezone based on a Tethys Enterprises, Inc. beverage bottling facility.

When the City originally filled out the County application form and submitted it, the City included information on a project-specific rezone. This included a detailed development proposal, site layout, and maps. This submission addressed all questions in the County's form and met all application criteria.¹⁴ However, because the City, and not a specific developer, submitted the application, the County determined the proposal was properly treated as a non-project proposal.

¹⁴ SCC 14.08.020(7)(b).

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Skagit County's review of the petition will be conducted pursuant to Skagit County Code (SCC) 14.08 as a non-project, legislative action, following the requirements of the 2002 GMA Framework Agreement and the Urban Growth Area (UGA) modification criteria. ... While the petition materials reference the Tethys project, please understand that the merits and impacts of the Tethys proposal are not within the scope of the County's review. Skagit County's review of the petition is limited to determining consistency with the Skagit County Comprehensive Plan (CP), Skagit County Code, and state law.¹⁵

In reliance, the City retained an outside consultant, E.D. Hovee & Company, LLC. Hovee & Company prepared a 49 page supplemental report, which included the County's requested analysis. As the City has addressed rezone criteria as to a specific project **and** provided supplemental information for the non-project proposal, there can be no issue as to whether or not the application is complete. County Planning & Development Services has found the submittal addresses the application criteria. As the Department implementing the County development code requirements, including application requirements, that determination must be deferred to.

2.5 Information Sufficient. *"The proposal lacks sufficient information and/or adequate detail to review and assess whether or not the proposal meets the applicable Comprehensive Plan designation criteria."*¹⁶

The City has submitted both an original application and almost fifty supplemental pages with information on proposal consistency with Comprehensive Plan designation criteria. This extensive analysis provides detail on the surrounding properties, available infrastructure and municipal services, potential development, and mitigation. This criterion has been addressed.

3. Conclusion

The City requests docketing of its ten acre UGA revision. The City's proposal meets all five docketing criteria. Whether one favors UGA revision or not is not the question. The only question is whether the five docketing factors have been addressed. Where a detailed proposal has been prepared to address a city's industrial and commercial lands deficiencies, and has the potential to bring 500 jobs to an area with high unemployment, such a proposal should be docketed, so its merits can be assessed.

¹⁵ County Planning & Development Services correspondence to City (October 10, 2012), p. 1.

¹⁶ SCC 14.08.030(3)(e).

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Docketing of Anacortes' Ten Acre UGA Revision
April 15, 2013
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The City requests that the Board adopt the recommendations of County Planning & Development Services and the County GMA Steering Committee, and docket the proposal.

Sincerely,

LAW OFFICES OF
SUSAN ELIZABETH DRUMMOND, PLLC



Susan Elizabeth Drummond

cc: Skagit County Planning & Development Services
City Planning, Community & Economic Development Department

135

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Tuesday, April 16, 2013 10:01 AM
To: Dale Pernula; Debra L. Nicholson; KirkJohnson; GaryChristensen
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Monday, April 15, 2013 1:05 PM
To: Planning & Development Services
Subject: PDS Comments

Name : Ed and Nancy
Address : 12345 some road
City : mt vernon
State : wa
Zip : 98273
email : asdfg@gmail.com
Phone : 3601234567
PermitProposal : CPA-PL-12-0258

Comments : We think it is very interesting, suspicious, and hypocritical when the same groups (City of Anacortes and the Swinomish Tribe) are promoting this bottling plant, taking millions of gallons of Skagit River water, while insisting on a moratorium on building permits in some areas of the county due to low river flow. This is dirty politics, plain and simple. Please oppose this project.

From Host Address: 66.218.202.55

Date and time received: 4/15/2013 1:00:05 PM

Debra L. Nicholson

From: KirkJohnson
Sent: Tuesday, April 09, 2013 11:00 AM
To: Larsen, Ryan (RyanL@cityofanacortes.org)
Subject: FW: Tethy hearing April 9

From: Amber Klllogjeri
Sent: Tuesday, April 09, 2013 8:27 AM
To: Dale Pernula; KirkJohnson; GaryChristensen
Subject: FW: Tethy hearing April 9

From the Commissioners email.

Amber Klllogjeri (x. 5567)
Skagit County Commissioners Office
aklllogjeri@co.skagit.wa.us

From: Sunnie Empie [<mailto:sunniebill@wavecable.com>]
Sent: Monday, April 08, 2013 7:49 AM
To: Commissioners
Subject: Tethy hearing April 9

Commissioner Ron Wesen, District I
Commissioner Ken Dahlstedt
Commissioner Dillon

Please be advised that I do not support any action to further the concept that Tethy has proposed for bottling Skagit water and the rail support it requires to move their product. Please keep this kind of industrialization OUT of Skagit Valley.

Kind regard, Arlene Sundquist Empie

Sun thoughts,
Sunnie Empie

sunnie1@me.com
www.boulderhousepublishers.com/content/ida_lillbroanda.html



PO Box 784, La Conner, WA. 98257--8927

137

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Wednesday, April 10, 2013 8:45 AM
To: Debra L. Nicholson
Subject: FW: PL12-0258, Anacortes/Tethys UGA Expansion Application: EI Request to Deny Docketing

Importance: High

From Dept Email

From: Evergreen Islands [<mailto:evergreen.islands@frontier.com>]
Sent: Friday, April 05, 2013 8:19 AM
To: Commissioners
Cc: Planning & Development Services; Undisclosed Recipients; Evergreen Islands Board of Trustees
Subject: PL12-0258, Anacortes/Tethys UGA Expansion Application: EI Request to Deny Docketing
Importance: High

Dear Commissioners:

Please accept the first comment letter (attached) from Evergreen Islands regarding the docketing of the Anacortes application to expand its Urban Growth Area.

The letter's summary is as follows:

SUMMARY

In summary,

- The County Planning Staff has erred by classifying the City of Anacortes application (the Application) for a 11-acre UGA Expansion because the City's quintessential reason for submitting the Application is to provide land for the Tethys bottling plant, one of the largest, if not the largest bottling plant in the United States.
- The original application did not specify or show how much land is required for the requisite rail yard for 100-unit water trains. This intentional omission conceals the actual amount of land that the Tethys water bottling plant will require. The County should demand that this additional land requirement be addressed in a "detailed development proposal."
- Steve Winters, the Tethys CEO has already stated, "We definitely plan to use the property in the UGA expansion." – a statement made after the proposed Tethys site was moved to a location within the Anacortes City Limits.
- By docketing this project, the Skagit County Commissioners will essentially deny the citizens of Skagit County the opportunity to participate in one of the largest land use decision in the County's recent history.

Evergreen Islands urges the Skagit County Commissioners to refuse to docket the City of Anacortes's application to expand its Urban Growth Area...

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Wednesday, April 10, 2013 8:44 AM
To: Debra L. Nicholson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Tuesday, April 09, 2013 12:50 PM
To: Planning & Development Services
Subject: PDS Comments

Name : Jennifer Fenswick
Address : 123 Private St.
City : Mt. Vernon
State : WA
Zip : 98274
email : navigatr@sonic.net
Phone : Please use email

PermitProposal : Bottling Plant/Anacortes Comments : I shall be brief. I vehemently oppose any plan that would permit 5.5 million gallons of water to be syphoned off the Skagit River every day. And here's why: I ask you to look down the road 15 to 20 years, when the population - and subsequent demands on the water supply - are nearly double. By now, Tethys has long since sold the bottling plant to a corporate interest such as Nestles, which demands its water else it plans to sue the city of Anacortes and perhaps even Skagit County. Pollution (from plastic), increased train traffic and its related noise, detriment to the environment, toll on property values, etc., etc., etc. -- all that aside, THERE WILL BE A CORPORATION CONTROLLING A HUGE PERCENTAGE OF THE WATER IN OUR COUNTY, AND WE CANNOT HAVE THAT. For the health and safety of our future generations, I strongly urge you to DENY THE PERMIT for the bottling plant in Anacortes. Thank you.

From Host Address: 76.28.203.51

Date and time received: 4/9/2013 12:49:36 PM

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Thursday, April 11, 2013 2:10 PM
To: Dale Pernula; KirkJohnson; Debra L. Nicholson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Thursday, April 11, 2013 11:15 AM
To: Planning & Development Services
Subject: PDS Comments

Name : Peggy Flynn
Address : 2317 18th Street
City : Anacortes
State : WA
Zip : 98221
email : peggy-flynn@comcast.net
Phone : 360-293-3424

PermitProposal : Anacortes UGA Expansion Petition Comments : Please allow the Anacortes UGA Expansion request to go forward. It's widely acknowledged that there is not enough industrial land in the City of Anacortes. To maintain the diversity and quality of services Anacortes residents have come to expect, we need the potential to grow living wage jobs. We need to have enough land for businesses to locate here. We need a zoning map that makes sense. There's a "hole" in the UGA and future economic development of land surrounding the acreage in question will be severely impacted until the "hole" is filled. We've been working to get this right for a long time The 1999 annexation of South March Point was planned with infrastructure capacity for industrial build out, with more than adequate capacity of all the required public services to support industrial use. This request meets all of the established criteria to qualify for docketing. I urge you to allow this long and complicated process to go forward. Thank you.

From Host Address: 174.61.143.233

Date and time received: 4/11/2013 11:13:52 AM

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Tuesday, April 16, 2013 10:48 AM
To: GaryChristensen; Dale Pernula; Debra L. Nicholson; KirkJohnson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Monday, April 15, 2013 10:45 AM
To: Planning & Development Services
Subject: PDS Comments

Name : Mariana Foliart
Address : 16653 Mountain View Road
City : mount Vernon
State : Washington
Zip : 98274
email : mfoliart@wavecable.com
Phone : 360-422-8549

PermitProposal : Tethys Water Bottling Project proposal Comments : Tethys should not have such free and easy access to a natural resource for the purpose of profit. There is nothing good for Anacortes residents or county residents coming from this project. This exploitation must not be allowed.

From Host Address: 24.113.236.39

Date and time received: 4/15/2013 10:41:50 AM

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Wednesday, April 10, 2013 8:44 AM
To: Debra L. Nicholson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Tuesday, April 09, 2013 12:55 PM
To: Planning & Development Services
Subject: PDS Comments

Name : Jubby Fouts
Address : 6443 Nootka Lane
City : Anacortes
State : WA
Zip : 98221
email : jubbyfouts@hotmail.com
Phone : 360-293-2704

PermitProposal : Anacortes UGA Annexation Permit

Comments : The annexation permit requested is detrimental to not only Anacortes, but to Skagit County as a whole. 1. Public safety is severely jeopardized by any large commercial project because ingress and egress may be rendered impossible in the event of emergency. 2. Water is a critical issue particularly in this vulnerable location. 3. Finally, the people of Skagit County DO NOT SUPPORT THIS PERMIT!

From Host Address: 208.74.153.86

Date and time received: 4/9/2013 12:50:34 PM

Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Wednesday, April 10, 2013 8:44 AM
To: Debra L. Nicholson
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Tuesday, April 09, 2013 1:55 PM
To: Planning & Development Services
Subject: PDS Comments

Name : Diane Freethy
Address : PO Box 762
City : Sedro-Woolley
State : wa
Zip : 98284

email : freeprss@wavecable.com

Phone : 360-856-2290

PermitProposal : Anacortes UGA Expansion Proposal Comments : Skagit County taxpayers should not be expected to pay for more time wasted on ridiculous planning decisions that foster public outrage. Moreover, the not-so-idle threat of another lawsuit over a flawed land-use decision should be enough to halt further action on this proposal. The project is unworthy of any further deliberation and must be dismissed immediately.

From Host Address: 24.113.129.200

Date and time received: 4/9/2013 1:50:59 PM

143



EVERGREEN ISLANDS

To: Skagit County Commissioners
 (Ken Dahlstedt, Sharon Dillon, Ron Wesen)
 1800 Continental Place
 Mount Vernon, WA 98273

*Sued:
 Fernula
 Nicholson*

Re: **PL12-0258, Anacortes/Tethys UGA Expansion Application**

**Evergreen Islands
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- Rich Bergner
- Steve Clark
- Andrea Doll
- Arlene French
- Vernon Lauridsen
- Julie White

mailing address
 P.O. Box 223
 Anacortes WA 98221

web address
 evergreenislands.org

tax deductions
 Evergreen Islands is a
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 tax-deductible.

Dear Commissioners:

We request that the Skagit County Board of Commissioners reject PL12-0258, Anacortes Petition to Modify the UGA, for docketing.

SCC 14.08.020 (7)(b)(i) requires that a "detailed development proposal that is consistent with the applicable designation criteria" be submitted with any petition that includes a rezone proposal. PL12-0258 is such a petition. That which is required to be submitted as part of a petition is subject to review and comment during deliberations on that petition.

The detailed development proposal attached to PL12-0258 is commonly known as the Tethys development proposal, as specified in the response to Section 3, question 1 of the petition.

This is obviously not a simple land swap and should be reviewed in 2014 as a Project Specific petition.

Respectfully yours,

Arlene French
 Arlene French

Trustee, Evergreen Islands

* 4/10/13 TO: Fax * 360 336 9307 County Commission
 FROM: Fax * 360 588 9468 Arlene French

1424



Dear Skagit County Commissioners,

I am writing to voice my concern over the fact that the Tethys application for expansion is being put forth as non project-specific, when it is clearly obvious that this is project-specific. I am opposed to the plant coming in and I want to be able to keep having input in the process. As I understand it, if this proposal is approved as non project-specific, then the City of Anacortes can move forward without further public input, which is extremely unfair to those of us who do not support it.

Mayor Dean Maxwell and Tethys CEO Steve Winters are promoting the water bottling plant as creating local jobs and revenue. Jobs created by a bottling plant are not long-term jobs in a world that is turning away from single-use disposable plastics. Land converted from rural reserve to UGA and developed for a bottling plant will potentially become yet another commercial graveyard that needs to be cleaned up when the jobs are lost due to the unsustainability of a failing single-use bottling market. Single use beverage bottles are one of the worst environmental offenders- they clog landfills, create pollution, contribute the the absorption of BPA in humans and animals, and are completely replaceable by glass, polycarbonate, and stainless steel reusable water bottles.

Communities elsewhere in the United States are banning the sale of single-use water bottles, and even our local high school teens are taking measures to decrease single-use water bottles with student-driven hydration station installations.

Please stop this plant from becoming a reality. Please refuse to docket the City of Anacortes' application to expand its Urban Growth Area until a more sustainable proposal is put forth.

Respectfully,

Gina Geer
1719 28th St. B
Anacortes, WA
98221

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Debra L. Nicholson

From: LoriAnderson on behalf of Planning & Development Services
Sent: Tuesday, April 16, 2013 10:00 AM
To: Dale Pernula; KirkJohnson; Debra L. Nicholson; GaryChristensen
Subject: FW: PDS Comments

From Dept Email

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

From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]
Sent: Monday, April 15, 2013 2:35 PM
To: Planning & Development Services
Subject: PDS Comments

Name : Leigh S. Giovane

Address : P.O. Box 692

City : La Conner

State : WA

Zip : 98257

email : ggiov03@yahoo.com

Phone : 360.466.0518

PermitProposal : Tethys Plant Proposal

Comments : My husband Gary and I oppose the proposed building of the Tethys bottling plant near Anacortes, WA. We feel that entering into a contract promising so much water to the Tethys firm for such a long period of time may someday come to endanger La Conner's access to water (the town of La Conner buys its water from Anacortes. Furthermore, bottled water and soft drinks are bad for public and environmental health. The promise of a few jobs should not encourage the County to make changes to accommodate a company which will eventually limit local residents' access to the water of our own Skagit River and damage our local ecology.

From Host Address: 50.123.115.120

Date and time received: 4/15/2013 2:33:01 PM



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Arlene French

Vernon Lauridsen

Julie White

mailing address
P.O. Box 223
Anacortes WA 98221

web address
evergreenislands.org

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EVERGREEN ISLANDS

RECEIVED
APR 15 2013
SKAGIT COUNTY
PDS
April 5, 2013

To: Skagit County Commissioners
(Ken Dahlstedt, Sharon Dillon, Ron Wesen)
1800 Continental Place
Mount Vernon, WA 98273

Re: **PL12-0258, Anacortes/Tethys UGA Expansion Application
Concealed Rail Yard Land Requirement**



Dear Commissioners:

The County Planning Staff has erred by classifying the City of Anacortes application (the Application) for a 11-acre UGA Expansion as a non-project issue because the City's quintessential reason for submitting the Application is to provide land for the Tethys bottling plant, one of the largest, if not the largest bottling plant in the United States.

As demonstrated by the following examples, the Tethys bottling facility will require 40 to 50 acres of land.

In December 2012 interview¹ with the Skagit Valley Herald, Steve Winters, the Tethys Chief Executive Officer (CEO), made the following comments:

We had a very similar proposal in Everett. Everett, quite frankly, had marginal land with regard to size, so the facility in Everett would not have been as large, ultimately. Most of the sites down there were in kind of the 35- to 40-acre range, which really limited our ability to do rail transportation. So the promise of having greater land was one of the things that was attractive up here.

Although Tethys has currently proposed a 29-acre site for the bottling plant facility within the Anacortes city limits, additional land is needed for the rail yard required for the 100-unit water trains which are an integral part of the Tethys proposal.

¹ "Q&A with Steve Winter, CEO of Tethys," Skagit Valley Herald, December 9, 2012.
http://www.goskagit.com/all_access/q-a-with-steve-winter-ceo-of-tethys/article_f4b82ec2-1286-5dd4-8e97-6f5e77fefaac.html?success=1

17

In a December 2012 Anacortes American article², includes the following Steve Winters's comment regarding the Sunland Topsoil site (emphasis added):

The outlined property is separate from the roughly 11 acres on the south side of Stevenson Road off Reservation Road that is also being eyed as part of the proposed facility. The city has requested an urban growth area expansion for that property.

Tethys CEO Steve Winter said the current 30 acres is just part of the plan.

“We definitely plan to use the property in the UGA expansion,” he said. “It could be used for anything. It could be for rail transportation staging or it could be used for the building.”

In Matthew Kelly's e-mail³ to Don Wick and Ryan Larsen, Mr. Kelly, a Tethys principal, states the following (emphasis added):

Foremost issue is obtaining a parcel of property proximate to rail that could serve our needs. Tesoro has the land, especially on the West side of March's Point. The question is whether they would have us. We should determine whether they would before moving ahead. **There are a number of landowners south of the refineries that may work as well, but the act of herding all of those owners into making a 40 to 50 acre parcel may not be doable either.** If Tesoro would be willing, that is the easiest option for all involved.

In his September 2010 e-mail⁴ to Phil Bastien, a Tethys Enterprises, Steve Winter, another Tethys Enterprises principal, conveyed his concerns regarding the Anacortes/Tethys Water Service Agreement's requirement that "The water is treated and packaged on the Property in units or containers of a size no greater than ten (10) gallons." In his e-mail, Mr. Bastien, in an effort to illustrate the scale, writes (emphasis added),

No standard pallet or other transport system could be used so special containers would have to be created at hug cost and be returnable to be practical. It would take over 670 rail cars every day on 7 miles of track to ship the 40 million pounds of water in 10 gallon bags. **That means you would need over a weeks' worth of shipping packages in stock, stored in a monstrous warehouse or on 4,700 rail cards (sic) in a yard requiring 47 miles of track.**

² "Tethys meets contract deadline for proposed bottling plant," Anacortes American, December 5, 2012. http://www.goanacortes.com/news/entry/tethys_meets_contract_deadline_for_proposed_bottling_plant

³ "Status," Matthew Kelly E-Mail to Don Wick and Ryan Larsen, Monday, April 26, 2010

⁴ "RE: Anacortes / Tethys Revised Water Contract," Steve Winter E-Mail to Phil Bastien, September 03, 2010.

748

In the December, 2012 Skagit Valley Herald article⁵ entitled "Q&A with Steve Winter, CEO of Tethys," included the following statements by Mr. Winters (emphasis added):

There's two primary issues with building a plant of that size. One is transportation. The reason is because your served market needs to be substantially larger than what you can reach by truck. With trucks you can go about 400 miles, which means basically you can cover Washington state, part of Oregon and maybe into Idaho. That's a fairly small demographic area, and you couldn't justify a megaplant based on that. **In order to build a larger plant, we have to have a transportation method that will get us a farther economic distance, and that's rail. So with rail, we can increase that by four, four-and-a-half times. Instead of going 400 miles, we can increase that to 1,600 miles or more. So we have to have a site that has on-side rail capacity, we need to be able to back a train onto our property and be able to load and stage that train, and then have that train leave our facility.**

So we needed to have the water, and **we needed to have the rail transportation.** Those are absolutely both key. We've been on the search for those two things, you know, get the water source and **find a site that can sustain rail transportation.**

One of the concepts behind this is that we can basically eliminate a lot of the warehouse space that you normally need in manufacturing, **because we use the rail, we'll use the trains as our warehouse.** So we will be staging product on trains and sending them out in as near real time as we possibly can. It's part of the efficiency equation that justifies building a plant of this size. If we can build and stage product in real time on these trains, and send them out to locations where the demand is, the economics work for it.

Having met this milestone now of ID'ing at least 30 acres, we're now entering the feasibility stage. That will take us about a year. And what is the feasibility? It's the period in which we determine several things. **Is the site actually suitable for what we want to accomplish? Can we put the rail on it? Can the rail provide the capacity that we're looking for? Can the site sustain the size plant that we're looking for? What are the environmental impacts? What are the transportation impacts?**

So Anacortes invited us to come up to their community because they felt they had the water and they had the availability of rail that could potentially meet our needs. So we've been working with Anacortes. **We had a very similar proposal in Everett. Everett, quite frankly, had marginal land with regard to size, so the facility in Everett would not have been as large, ultimately. Most of the sites down there were in kind of the 35- to 40-acre range, which really limited our ability to do rail transportation. So the promise of having greater land was one of the things that was attractive up here.**

⁵ 16. "Q&A with Steve Winter, CEO of Tethys," Skagit Valley Herald, December 9, 2012.
http://www.goskagit.com/all_access/q-a-with-steve-winter-ceo-of-tethys/article_f4b82ee2-1286-5dd4-8e97-6f5e77fefaac.html?success=1

149

In the September 14, 2012 edition⁶ of Skagit Valley Herald, Steve Winters states the following (emphasis added):

Winter said the facility needs to be large and rail-connected to succeed in an industry where the status quo — single-brand production facilities using trucks to transport goods — are relatively inefficient. **He said a large rail transfer station would be located on-site.**

Figure 13 of the original application, which has not been revised, is included below.



Conceptual Plant Site Layout

with Concept Plant Layout Area

In small print, Figure 13 includes a note that states, “Some Rail Service and Staging Areas May Extend an Additional 700’ +/-.” The additional 700’ is required for the rail yard needed to accommodate up to four 100-car unit trains – unit trains that are nearly 1-1/2 miles long.

⁶ “Tethys CEO sheds light on bottling plant,” Skagit Valley Herald, September 14, 2012
http://www.goskagit.com/all_access/tethys-ceo-sheds-light-on-bottling-plant/article_d7526ced-ba59-5b18-9a01-83b0d03accd5.html

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Businesses Requiring Unit Trains Require Long Narrow Sites

Tesoro's SEPA checklist⁷ provides the following details regarding the rail yard for their 100-car unit train:

The proposed Unloading Facility and associated structures will be approximately 18.6 acres (1,600 x 110 feet) and will consist of the following elements:

- 4 railway tracks, about 4,100 feet in total length, located parallel to the existing railroad corridor.
- Tie-up tracks will be constructed along the tracks and will be long enough to store four 6-axle locomotives.

Figure 3 the rail yard diagram that was included in Tesoro's SEPA checklist⁷. The diagram notes that the track labeled "Unit Train Ready for Pick Up" is 6,477 feet (1.6 miles) long.

Figure 3. Tesoro's Rail Yard Diagram for Its Unit Train Rail Yard.

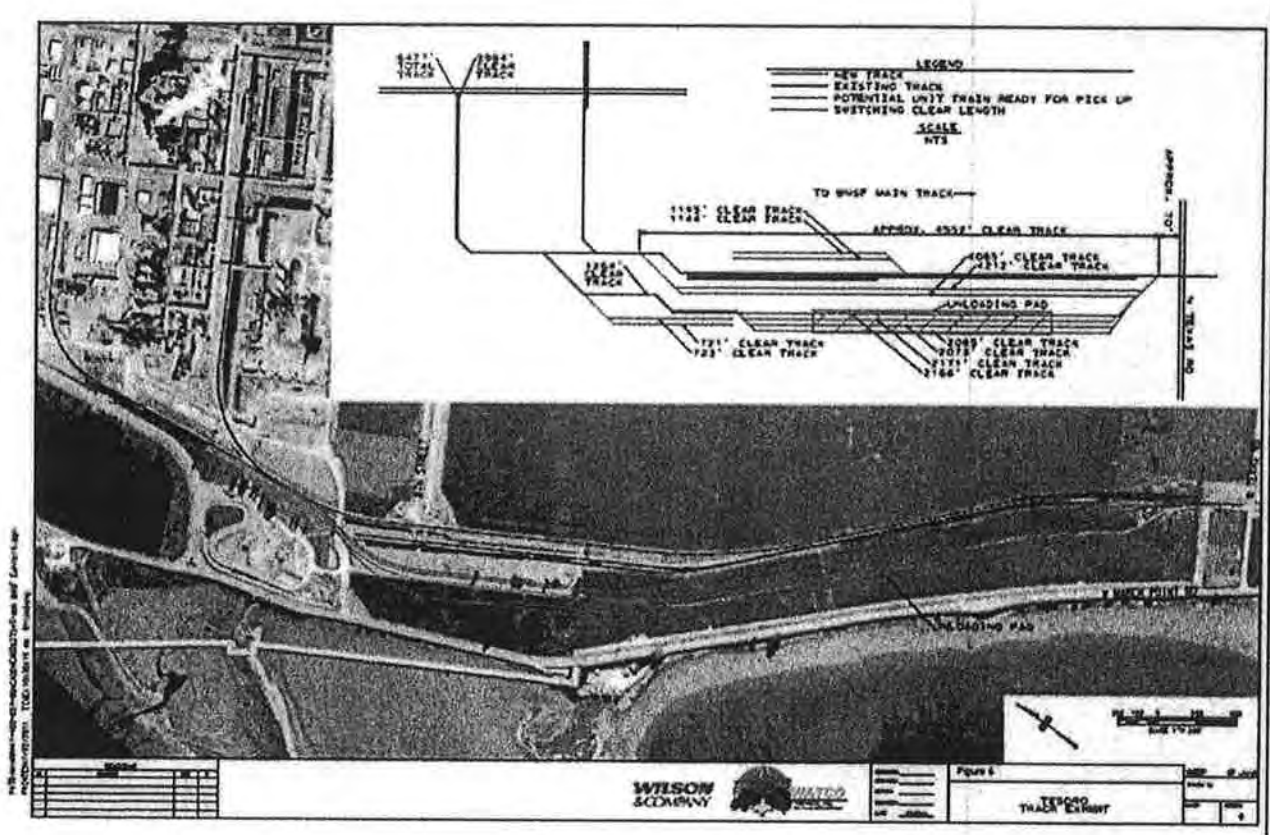


Figure 4 is a satellite photo of March Point with the Tesoro rail yard diagram overlaid. Figure 5 is an aerial photo of the recently completed Tesoro rail yard. (Note that the Tesoro rail yard honors the 200' shoreline buffer.) Figure 6 is a map showing the length of the Tesoro unit train rail yard overlaid on the County Comprehensive Plan map of the UGA Expansion area.

⁷ Tesoro Unit Train Unloading Facility SEPA Checklist -- BP11-280, July 25, 2011.

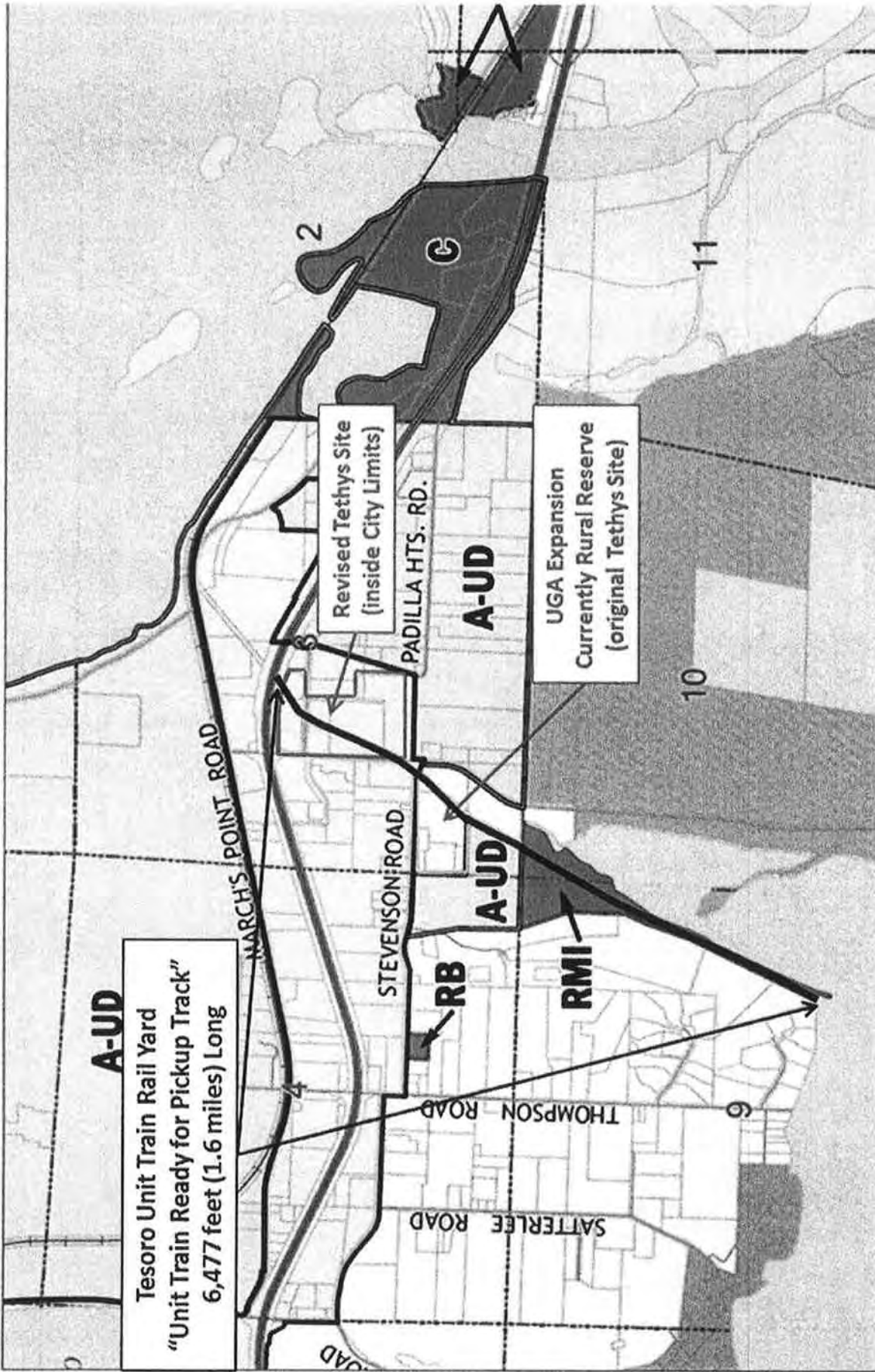
Figure 4. Satellite Photo Showing Tesoro's Rail Yard for Its Unit Trains.



Figure 5. Aerial Photo Showing Tesoro's Newly Completed Rail Yard.



Figure 6. County Comprehensive Plan Map with the Length of the Tesoro Unity Train Rail Yard Overlaid.




SUMMARY

In summary,

- The County Planning Staff has erred by classifying the City of Anacortes application (the Application) for a 11-acre UGA Expansion because the City's quintessential reason for submitting the Application is to provide land for the Tethys bottling plant, one of the largest, if not the largest bottling plant in the United States.
- As is still the case, the original application did not specify or show how much land is required for the requisite rail yard for 100-unit water trains. This intentional omission conceals the actual amount of land that the Tethys water bottling plant will require. The County should demand that this additional land requirement be addressed in a "detailed development proposal."
- Steve Winters, the Tethys CEO has already stated, "We definitely plan to use the property in the UGA expansion." – a statement made after the proposed Tethys site was moved to a location within the Anacortes City Limits.
- By docketing this project, the Skagit County Commissioners will essentially deny the citizens of Skagit County the opportunity to participate in one of the largest land use decision in the County's recent history.

Evergreen Islands urges the Skagit County Commissioners to refuse to docket the City of Anacortes's application to expand its Urban Growth Area...

Respectfully yours,



Tom Glade

President, Evergreen Islands

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