

ISLAND COUNTY
DRAFT COMPREHENSIVE PLAN ELEMENTS, DRAFT DEVELOPMENT
REGULATIONS
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS)

Notice is hereby given that draft Island County Comprehensive Plan Elements, development regulations, and the Final Environmental Impact Statement (FEIS) on the Comprehensive Plan and development regulations are available for review.

The Comprehensive Plan is intended to guide the pattern of residential, commercial, and industrial development in Island County over the next 20 years, and to meet the goals and intent of the Growth Management Act of 1990. The development regulations are intended to implement the provisions of the Comprehensive Plan.

The draft Plan elements, development regulations, and FEIS are available for review at the following locations:

CAMANO ISLAND

Camano Annex
121 N East Camano Drive
Camano Island, WA 98292
8:00 AM - 4:30 PM M-F

WHIDBEY ISLAND

Island County Planning and
Community Development
Courthouse Annex
One 6TH Street
Coupeville, WA 98239
10:00 AM - 4:30 PM M-F

These materials are also available for review at local libraries, and are available for review or download via the internet at:

<http://www.whidbeynet.net/islandplan>

Responsible Official:

Vincent J. Moore, Planning Director
Island County Planning and Community Development
PO Box 5000
Coupeville, WA 98239-5000
679-7339, 321-5111, 629-4522

Hearings on the Plan and regulations will be held at 6:00 PM on September 22 and 24, 1998, with final Board of County Commissioner action on the Comprehensive Plan and development regulations scheduled for September 28, 1998, beginning at 2:45 PM, all in the Commissioner's Hearing Room in Coupeville.

Issue Date: September 18, 1998



Vincent J. Moore, Planning Director

FINAL ENVIRONMENTAL IMPACT STATEMENT

ISLAND COUNTY COMPREHENSIVE PLAN

SEPTEMBER 18, 1998

1 **INTRODUCTION**

2 This Final Environmental Impact Statement (FEIS) has been prepared in accordance with the
3 procedural requirements of WAC 197-11 SEPA Rules. It is the final step in the phased review
4 process that began with issuance of the integrated DEIS and Staff Draft Land Use Element in
5 November 1996, and which was followed by two Supplemental DEIS (SDEIS) in March 1998
6 and July 1998. The March 1998 SDEIS was specific to the Phase A Team Draft Land Use
7 Element. The July 1998 SDEIS reviewed the Phase B Team Draft Comprehensive Plan, which
8 included the remaining plan elements and updated development regulations.

9 The primary purpose of this FEIS is to provide responses to comments received during the
10 development of the County's Comprehensive Plan, which has included numerous public
11 meetings and hearings, providing valuable input from the general public and affected
12 government agencies and private organizations. The comments responded to within this
13 document have been those that were specific to environmental considerations or which had a
14 clear environmental component. Comments received that addressed issues relating to the
15 Comprehensive Plan itself are part of the public record and have been used by County staff and
16 consultants in preparing the various plan elements and supporting development regulations.

17 A phased environmental review has been used in the plan development process to ensure that
18 environmental considerations were included early in the process, to assist in developing a
19 preferred land use strategy, to further refine the land use strategy, and to ensure there has been
20 maximum opportunity for the public and affected agencies and organizations to provide input to
21 the process.

22 **SEPA AND GMA**

23 The State Environmental Policy Act (SEPA) allows for the integration of requirements under
24 SEPA and GMA to ensure environmental analysis may occur concurrently with the planning and
25 decision making under GMA. It is also intended to reduce duplication of analysis and paperwork
26 in meeting the informational and procedural requirements of both SEPA and GMA.

27 This means that environmental information and analysis may be incorporated into a plan
28 document to meet the SEPA requirements. An integrated GMA document (i.e. the
29 Comprehensive Plan) is not required to contain a separate section on affected environment,
30 significant impacts, and mitigation measures as long as this information is summarized and the
31 basis for this information can be readily found in the plan document, supporting technical studies
32 and analysis, or in the supporting public record.

33 SEPA/GMA integration is particularly useful in performing a phased environmental review as
34 part of preparing a comprehensive plan. The County has utilized this approach as mentioned
35 above. The process began with a generalized assessment of the environmental impacts between
36 four land use alternatives. As the process proceeded the County has undertaken a number of
37 technical studies that have been increasingly more specific as the land use strategy became more
38 refined and the remaining plan elements completed. As a result environmental issues are an
39 integral part of the technical studies and the comprehensive plan elements.

FEIS CONTENTS

The information contained under this cover is one part of what is considered the FEIS. As stated above the primary function of this document is to respond to comments related to SEPA issues that have been submitted during the plan development process. It is added as an addendum to the previous environmental review documents, with the entire set of documents comprising the total FEIS. This is provided for in WAC 197-11-560. The FEIS consists of the following:

- Final Environmental Impact Statement - Response to Comments
- Supplemental DEIS - Phase B Team Draft Comprehensive Plan, 7/14/98
- Supplemental DEIS - Phase A Team Draft Land Use Element, 3/9/98
- Draft EIS - Staff Draft Land Use Element, 11/12/96

Note that the Phase B Team Draft SDEIS and the associated Appendix 'C' are included under this cover since minor corrections and additions have been made per request. The DEIS and Phase A Team Draft SDEIS are under separate cover and available from the County.

The FEIS is supported by the information, analysis, and review contained in the following documents:

- Draft Island County Comprehensive Plan, 7/14/98
- Draft Technical Appendices: Island County Comprehensive Plan, 7/14/98

The Draft Technical Appendices includes the following:

- Island County Planned Residential Development Analysis, February 1998.
- Island County Platting Data, 1985 - 1997 , June 1998.
- Island County Rural Residential and Rural Lands Analysis, June 1998.
- Potential Rural Service Lands Study, May 1998.
- Tax Shifting Implications of Public Benefit Rating Systems, June 1998.
- Island County Conservation Futures Fund - Open Space Purchases.
- Island County Park Maintenance Standards.
- Results of 1991 Island County Survey.
- Candidate Sites for Public Acquisition as Listed by Natural Lands, July 1998.
- Land Uses in the Rural Area - Draft Recommendations, May 1998.
- Staff Comments on Existing Site Plan Review Criteria, May 1998.
- Staff Proposed Criteria - Site Plan Review, May 1998.
- Forecasting Procedures for Population & Employment In Island County For 1996 - 2020.
- Travel Demand Forecasting Procedures.
- Public Involvement for Team Draft, June 1998.
- Island County Commercial Agriculture Land Study, February, 1998.
- Island County Commercial Forest Land Study, January, 1998
- Camano Island Annex Non-Municipal Urban Growth Area Study, June 1997
- Camano Island Country Club Non-Municipal Urban Growth Area Study, July 1997.
- Freeland Non-Municipal Urban Growth Area Study, June 1997.
- Goldie Road Light Industrial/Business Park Area Study, June 1997.

Clinton Non-Municipal Urban Growth Area Study, June 1997.
Clinton Wastewater Facilities Plan, May 1994.
Draft County-Wide Planning Policies, March 1998.
North Whidbey Community Diversification Action Plan, August 1995.
City of Langley Comprehensive Plan, November 1994.
Oak Harbor Comprehensive Plan, December 1995.
Oak Harbor Urban Growth Area Report, June 1994.
Town of Coupeville Comprehensive Plan, October 1994.
Business and Land Use Needs for Island County to the Year 2016, May 1996.
Preliminary Draft - Business Activities in Rural Lands, February 1998.

RESPONSE TO COMMENTS

This section provides responses to SEPA comments received during the three phases of environmental review. The section is divided into three parts corresponding to the comments submitted for each phase.

DEIS Staff Draft Land Use Element - November 12, 1996

The majority of the comments received during the phased environmental review came early in the process following the release of the Staff Draft Land Use Element. Since many of the comments received repeat each other and reiterate similar concerns they have been summarized into several categories and a single response provided. The remaining comments are responded to individually within the list of comments later in this section.

SUMMARIZED RESPONSES

1) Many comments received in this phase of review (and in the subsequent phases) requested additional time to comment on the contents of the DEIS beyond the initial 30 day period and 15 day extension.

RESPONSE: SEPA provides that "any person or agency shall have thirty days from the date of issue in which to review and comment upon the DEIS" (WAC 197-11-455(6)). Additionally, "Upon request, the lead agency may grant an extension of up to fifteen days to the comment period" (WAC 197-11-455(7)). The use of the singular ("an extension") and of the restrictive language ("up to fifteen days") clearly limits the lead agency's authority to grant extensions of the comment period beyond the initial fifteen day extension. Comments received after the end of the SEPA comment periods are not specifically addressed in the "Response to Comments" section in the FEIS, but the Planning Commission or Board of Commissioners have given consideration to these comments in drafting the final version of the Comprehensive Plan.

2) Several comments expressed concern over the fact that PRDs and PRCs would be allowed to expand beyond the initially established boundaries under certain conditions and that this approach would ultimately lead to increased sprawl and further environmental impacts.

RESPONSE: Since release of the Staff Draft the land use designations of PRC, PRD, RAC, and RCC have been eliminated and have been replaced with the concept of rural areas of more

intensive development (RAIDs) (see discussion in the SDEIS for the Phase A Team Draft Land Use Element). The current plan draft establishes logical outer boundaries for RAIDs and does not allow for their expansion.

3) A number of comments received were in reference to Fully Contained New Communities (FCNC), both for and against. Those against their use in the plan were concerned that allowing this type of development would degrade the environment and impact the County's rural character.

RESPONSE: Based on public comment the County eliminated Fully Contained New Communities from the Comprehensive Plan.

4) Concerns were raised over the fact that there was no in depth discussion of water availability to support new growth.

RESPONSE: The County has incorporated a Water Resources Element into the Comprehensive Plan. In addition, updated development regulations specifically address issues related to protection of water quality and water availability (see discussions in the SDEIS for the Phase B Team Draft Comprehensive Plan and development regulations).

5) Several people stated that the description of the difference in environmental impacts between the four land use alternatives was not specific enough to make an informed decision between those alternatives and that it lacked specific items such as discussions of particular species and habitats.

RESPONSE: For non-project actions, particularly those related to large geographic areas, SEPA allows for a level of detail commensurate to what can be reasonably known at the time of review and analysis. The DEIS provides a general comparison of the four alternatives in part because for many issues the information needed to provide detailed quantitative and numeric comparisons is based on site specific data that was not reasonably available at the time. It is important to note that the choice of alternative is not based solely on environmental issues. The environmental comparison does provide enough information to make a reasoned decision when choosing an alternative in conjunction with other GMA considerations such as property rights, ability of the municipalities to accommodate growth, and the existing development pattern.

6) Comments regarding the potential mitigation measures were directed at the use of words such as 'potential', 'emphasize', 'encourage', 'could', and 'when appropriate'. The comments suggested that the use of such words weakened the intent of otherwise sound measures.

RESPONSE: The potential mitigation measures identified in the DEIS are offered as a list of options the County could pursue in off-setting the effects of increased growth. They were not intended to function as policy statements or to be prescriptive in nature. They have been used to guide development of plan policies and development regulations. They have also been used in the SDEIS for the Phase B Team Draft Comprehensive Plan and development regulations as a mitigation checklist in evaluating the plan and regulations.

1 INDIVIDUAL RESPONSES

2 This section of the Final EIS contains the
3 comments received on the Draft Island
4 County Comprehensive Plan Land Use
5 Element/EIS. The comments are numbered
6 and grouped by State Agencies, Regional
7 Agencies/Governments, Organizations,
8 Individuals, and Public Testimony.
9 Response numbers appear in the margins of
10 the letters and are cross-referenced to the
11 corresponding response.

12 Responses are provided for substantive
13 comments on the Draft EIS. Expressions of
14 opinions and subjective statements are
15 acknowledged without further comment.
16 Where comments appear more than once, a
17 complete response is provided for the first
18 occurrence; subsequent comments are
19 referred to the first response. (Note this
20 format is also used for responses to
21 comments received on the Supplemental
22 DEISs).

23 **State Agencies**

24 **Response to the State of Washington**
25 **Department of Fish and Wildlife - Letter**
26 **No. 1**

27 1. **Issue:** WDFW points out that several of
28 the policies in the plan will benefit fish
29 and wildlife resources. Among them
30 are: the interconnection of natural areas
31 for wildlife (p. 137), noting that known
32 or potential natural areas and linkages
33 should be mapped; restoration of
34 wetlands and habitats (p. 137);
35 restriction of development and wetlands
36 and streams (p. 139); watershed
37 management planning (p. 141); and
38 protection of species by utilizing
39 WDFW's Priority Habitats and Species
40 Program (p. 141).

41 **Response:** Comment acknowledged.

42 2. **Issue:** WDFW appreciates the county's
43 intention to consult with them when
44 making wildlife management and
45 protection decisions (p. 190).

46 **Response:** Comment acknowledged.

47 3. **Issue:** WDFW states that the draft plan
48 and preferred alternative (Alternative 4 -
49 Dispersed Growth) do not reflect the
50 fundamental values of Island County
51 residents regarding protection of rural
52 areas and the environment.

53 **Response:** Comment acknowledged.
54 County residents have had further
55 opportunities to express their views and
56 inform the planning process during
57 workshops, public hearings, and
58 subsequent phases of environmental
59 review.

60 4. **Issue:** WDFW points out that the
61 description of rural character in the plan
62 appears to typify rural sprawl. WDFW
63 questions whether this description would
64 be wanted by those who want to preserve
65 rural character. The description also
66 does not describe a pattern of growth
67 that is sensitive to the needs of fish and
68 wildlife. WDFW states that this
69 description of rural character and the
70 preferred alternative do not appear to
71 reflect the desires of residents to protect
72 the environment.

73 **Response:** Comment acknowledged.

74 5. **Issue:** WDFW points out that the
75 negative effect of these numerous nodes
76 of growth on rural character and on fish
77 and wildlife resources will be
78 exacerbated by the acknowledgment that
79 a significant number of parcels in Island
80 County do not meet the minimum parcel
81 size for their zone and therefore are non-
82 conforming in size (p. 69).

1 **Response:** Comment acknowledged.
 2 6. **Issue:** WDFW states that the preferred
 3 alternative (Alternative 4) focuses
 4 significant growth outside of urban
 5 growth areas and that provides for
 6 residential, multi-family residential,
 7 commercial, and industrial uses in these
 8 areas is incompatible with the primary
 9 use of rural and resource land to produce
 10 food and fiber and is not rural in
 11 character.

12 **Response:** Comment acknowledged.

13 7. **Issue:** WDFW thinks that fish and
 14 wildlife resources that benefit from the
 15 preservation of rural areas will be best
 16 served through Alternative 2 - Major
 17 Urban Growth Areas. Alternative 2
 18 incorporates benefits that reflect GMA
 19 goals and community values, including
 20 the lowest investment in roads, greatest
 21 retention of rural character, least impact
 22 to natural resource lands, greatest
 23 simplification of mitigation planning,
 24 greatest reduction of overall cumulative
 25 impacts, least amount of surface and
 26 groundwater resources that would be
 27 potentially impacted, widest access to all
 28 energy resources, and greatest efficiency
 29 in providing public services and utilities.

30 **Response:** Comment acknowledged.

31 8. **Issue:** WDFW's Priority Habitats and
 32 Species (PHS) Program is listed as a
 33 source of information for fish and
 34 wildlife habitat conservation areas (p.
 35 37), however, no map is provided that
 36 shows the generalized locations of fish
 37 and wildlife habitat conservation areas.
 38 This should be corrected by adding a
 39 map for fish and wildlife resources in
 40 Island County.

41 **Response:** This has been provided in
 42 the Phase B Team Draft of the
 43 comprehensive plan.

44 9. **Issue:** The Plan makes reference to
 45 WDFW's "protected habitats and species
 46 program" (p. 141, 144). The word
 47 "protected" should be changed to
 48 "priority" to reflect the program's
 49 correct name (Priority Habitats and
 50 Species, or PHS).

51 **Response:** Acknowledged.

52 10. **Issue:** WDFW strongly recommends
 53 that Island County include WDFW's
 54 PHS program in its consideration of Fish
 55 & Wildlife Habitat Conservation Areas.
 56 This would be accomplished by defining
 57 Fish and Wildlife Habitat Conservation
 58 Areas, in part, in the following manner:
 59 "Fish and Wildlife Habitat Conservation
 60 Areas include: (A) Areas with which
 61 priority species (as determined by the
 62 Washington Department of Fish and
 63 Wildlife) have a primary association.
 64 Priority species are wildlife species of
 65 concern due to their population status
 66 and their sensitivity to habitat alteration;
 67 (B) Priority habitats as identified by the
 68 Washington Department of Fish and
 69 Wildlife. Priority habitats are areas with
 70 one or more of the following attributes:
 71 comparatively high wildlife diversity,
 72 high wildlife species richness,
 73 significant wildlife species richness,
 74 significant wildlife breeding habitat,
 75 significant wildlife seasonal ranges,
 76 significant movement corridors for
 77 wildlife, limited availability, and/or high
 78 vulnerability; (C) Habitats and species of
 79 local importance; and (D) Habitat
 80 corridors ... (etc.)".

81 **Response:** Comment acknowledged.

- 1 **11. Issue:** WDFW recommends that Island
2 County consider the procedures adopted
3 by San Juan County as a model to
4 identify and protect habitats and species
5 of local importance (p. 144).
6 **Response:** Comment acknowledged.
- 7 **12. Issue:** WDFW states that the Plan
8 provides an inadequate basis for the
9 protection of wetlands. WDFW states
10 that in addition to community values,
11 wetland policies should be based on best
12 available science, as called for in 36.70A
13 RCW, instead of being based on the
14 economic, environmental, and cultural
15 values of the community.
16 **Response:** Wetland policies and
17 protective regulations have been
18 amended to provide better protection.
19 See discussion in the SDEIS for the
20 Phase B Team Draft Comprehensive
21 Plan.
- 22 **13. Issue:** WDFW points out that the a
23 phrase on page 184 states that intensive
24 development "when possible" will be
25 located away from critical areas.
26 WDFW recommends that this phrase be
27 removed or substantially amended to
28 provide a firmer basis for protecting
29 critical areas.
30 **Response:** Comment acknowledged.
- 31 **14. Issue:** WDFW recommends that when
32 Island County develops buffer standards
33 that are appropriate to the functions,
34 values, and sensitivity of wetlands (p.
35 186), the model wetlands ordinance
36 developed by the Department of Ecology
37 be integrated into the county's standards
38 as much as possible.
39 **Response:** The DOE model ordinance
40 is one of several that have been reviewed
41 in developing the draft updates to the
- 42 wetland regulations currently under
43 review.
- 44 **Response to the Washington State**
45 **Department of Natural Resources - Letter**
46 **No. 2**
- 47 **1. Issue:** DNR states that the Plan builds a
48 foundation that will enable the county to
49 maintain its rural lands, promote
50 growing urban areas and conserve
51 natural resource lands in a way that fits
52 the unique island geography and growth
53 pressures.
54 **Response:** Comment acknowledged.
- 55 **2. Issue:** DNR supports the Plan in
56 providing a clear picture of the natural
57 resource management issues and
58 conservation strategies for the county.
59 **Response:** Comment acknowledged.
- 60 **3. Issue:** DNR supports the Plan in
61 providing strategies on how rural lands
62 will interrelate to adjacent resource lands
63 to reduce potential land use conflicts,
64 maintain resource lands where rural
65 residential development occurs next to,
66 and potentially around and within, forest
67 lands, agriculture lands and mineral
68 lands of long term commercial
69 significance.
70 **Response:** Comment acknowledged.
- 71 **4. Issue:** DNR supports the Plan in
72 providing equal treatment of state lands
73 when compared to private lands.
74 **Response:** Comment acknowledged.
- 75 **5. Issue:** DNR supports the Plan in
76 providing provisions for developing
77 ordinances for resource protection,
78 conservation of natural resources of
79 long-term significance, open space, and
80 right to farm and forest.

- | | | | |
|----|--|----|--|
| 1 | Response: Comment acknowledged. | 42 | ingress and egress routes and |
| 2 | 6. Issue: DNR supports the Plan in | 43 | turnarounds for emergency units; and (d) |
| 3 | modifying the Transfer of Development | 44 | adequate water supply with back up |
| 4 | Rights (TDR) Program in a way to give | 45 | power generation equipment or other |
| 5 | incentives for Agriculture and Forest | 46 | means to cost effectively deliver water to |
| 6 | Lands owners to manage their lands as | 47 | the fire. |
| 7 | such. | 48 | Response: Comment acknowledged. |
| 8 | Response: Comment acknowledged. | 49 | 11. Issue: Pages 36 (3rd paragraph) and |
| 9 | However, the use of a TDR program has | 50 | page 154, item I contain language that is |
| 10 | been eliminated in the current plan draft. | 51 | not accurate. It is not the Department's |
| 11 | See discussions of currently proposed | 52 | position that Department managed lands |
| 12 | Agriculture and Forest protection | 53 | "will be sold in the near future". DNR |
| 13 | incentives in the SDEIS for the Phase B | 54 | recommends that the two references be |
| 14 | Team Draft Comprehensive Plan and | 55 | deleted from the Plan. |
| 15 | development regulations. | 56 | Response: These references have been |
| 16 | 7. Issue: DNR supports the integrating of | 57 | removed. |
| 17 | the shoreline land use designations of the | 58 | 12. Issue: Regarding page 188, Fish and |
| 18 | Shoreline Master Plan (SMP) into the | 59 | Wildlife Habitat Conservation Area |
| 19 | Comprehensive Plan. | 60 | Policies, DNR points out that the Plan |
| 20 | Response: Comment acknowledged. | 61 | does not include maps defining the |
| 21 | 8. Issue: DNR recommends that the Plan | 62 | location of commercial and recreational |
| 22 | would be further enhanced if it would | 63 | shellfish beds, kelp and eelgrass beds |
| 23 | relate all shoreline zoning to the specific | 64 | and herring and smelt spawning areas. |
| 24 | shoreline designations of the SMP as | 65 | DNR recommends that the Plan |
| 25 | was done with the Shoreline Residential | 66 | reference the <u>Department of Ecology's</u> |
| 26 | PRDs section. | 67 | <u>Coastal Zone Atlas for Island County</u> |
| 27 | Response: Comment acknowledged. | 68 | and the WDFW <u>Technical Report</u> |
| 28 | 9. Issue: DNR suggests that the Land Use | 69 | <u>Number 79</u> in the Land Use Element and |
| 29 | Element recognize DNR's jurisdiction | 70 | utilize this information when making |
| 30 | over forest practices under the authority | 71 | planning decisions that influence these |
| 31 | of the Forest Practices Act and surface | 72 | aquatic resources. |
| 32 | mining reclamation on operations in | 73 | Response: Comment acknowledged. |
| 33 | excess of three acres under the authority | 74 | New maps have been prepared for the |
| 34 | of the Surface Mining Act. | 75 | comprehensive plan. |
| 35 | Response: Comment acknowledged. | 76 | Regional Agencies/Governments |
| 36 | 10. Issue: Due to the seriousness of | 77 | Response to the Island County Department of |
| 37 | wildfire, DNR recommends that the Plan | 78 | Public Works - Letter No. 3 |
| 38 | should address the following for both | 79 | Issue: The Public Works Department |
| 39 | rural and resource lands: (a) sufficient | 80 | makes numerous comments concerning |
| 40 | fuel free areas around structures; (b) fire | | |
| 41 | resistant roofing materials; (c) adequate | | |

1 the potential mitigation measures that
2 ask about how a specific measure will be
3 implemented, request clarifications,
4 make factual corrections, or make
5 suggestions about including additional or
6 revised language.

7 **Response:** County staff and consultants
8 have reviewed Public Works' comments
9 and have utilized them in developing the
10 current draft comprehensive plan and
11 development regulations. See also
12 response (6) on page 4 of this document.

13 **Response to Puget Power - Letter No. 4**

14 1. **Issue:** Regarding Conservation,
15 Environment and Human Health, policy
16 3, page 4 of Volume Two. The policy as
17 currently drafted might suggest
18 inappropriately that "harmful biological
19 effects" are in fact associated with the
20 utility facilities mentioned. The policy
21 should be redrafted to read, "While the
22 presence or absence of harmful
23 biological effects..."

24 **Response:** Comment acknowledged.

25 2. **Issue:** To make State Environmental
26 Policy Act, page 5 of Volume 2
27 consistent with WAC 197-11-
28 800(24)(c), it should be redrafted to
29 read, "... installation, construction or
30 alteration of electric facilities with an
31 associated voltage of 55,000 volts
32 (55kV) or less, overbuilding of existing
33 distribution lines (55kV or less) with
34 transmission lines (greater than 55kV)
35 and underground installation of all
36 electric facilities; the installation of
37 natural gas ..."

38 **Response:** Comment acknowledged.

39 **Response to the Town of Coupeville - Letter No. 5**

40 1. **Issue:** The Town of Coupeville notes
41 that in general, the proposed impact
42 mitigation and draft policies appear to
43 represent a creative approach to
44 compliance with the Growth
45 Management Act, while recognizing
46 historic patterns of development within
47 Island County.

48 **Response:** Comment acknowledged.

49 2. **Issue:** Is the scope of the DEIS limited
50 to the land use element only? If so, will
51 there be later opportunities to comment
52 on potential impacts from the other
53 elements of the comprehensive plan? In
54 particular, it would be helpful to see an
55 analysis of impacts from the proposed
56 level of service standards contained in
57 the capital facilities element.

58 **Response:** The DEIS was limited to the
59 Staff Draft Land Use Element. The
60 remaining draft plan elements were
61 completed and released in July 1998,
62 with the comment period ending on
63 August 14. Level of service standards
64 are provided in the Capital Facilities
65 element of the plan.

66 3. **Issue:** The impact analysis for public
67 services under Alternative 4 seems
68 underdeveloped. Additional
69 consideration should be given to how
70 each of the alternatives would impact the
71 potential for growth of County facilities
72 within Coupeville as the County seat.

73 **Response:** Comment acknowledged.

1 **Organizations**

2 **Response to the Camano Island Community**
3 **Council (Dec. 20, 1996) - Letter No. 6**

4 **1. Issue:** The Camano Island Community
5 Council requests that the SEPA review
6 period be extended an additional thirty
7 days beyond the extended deadline of
8 December 27, 1996.

9 **Response:** See response (1) on page 3
10 of this document.

11 **2. Issue:** The CICC requests clarification
12 on the sections of the draft which will be
13 closed to comment at the end of the
14 SEPA review period.

15 **Response:** The SEPA comment period
16 is intended for public comment on the
17 Environmental Summary portion of the
18 draft Plan in addition to any aspects of
19 the draft Plan that fall under the
20 guidelines of the State Environmental
21 Policy Act.

22 **3. Issue:** The CICC proposes a two step
23 process for presentation and comment on
24 the proposed staff draft of the
25 Comprehensive Plan. As each element
26 is released, step one would involve 45
27 days for plan presentation throughout the
28 county, and a new 45 day period as each
29 element is released. This would allow
30 time for the public to hear presentations
31 and develop responses. Step two would
32 include 45 or more days allocated to
33 listening to public comments, fears,
34 concerns and suggestions for
35 improvement.

36 **Response:** Please refer to the response
37 to #1 above.

38 **Response to the Camano Island**
39 **Community Council (Dec. 27, 1996) -**
40 **Letter No. 7**

41 **1. Issue:** Regarding Alternative 4, CICC
42 points out that "moderated development
43 of adjacent lands" around designated
44 existing rural residential neighborhoods
45 would result in a continuation of the
46 current trend of sprawling suburban
47 development. The discussion under
48 Alternative 4 does not provide
49 justification as to why a continuation of
50 this trend is necessary.

51 **Response:** See response (2) on page 3
52 of this document.

53 **2. Issue:** Alternative 4 should be revised
54 in the following areas: land use capacity
55 analysis; justification and empirical
56 support of assumptions regarding
57 development potential of PRD lots and
58 household size; and identification of
59 precisely what proportion of the 20-year
60 growth can be accommodated by
61 existing legal lots in PRDs and PRCs
62 and precisely what proportion of the 20-
63 year growth must be accommodated by
64 other means; and why such rural sprawl
65 would be preferable to allocating the
66 remaining population to areas adjacent to
67 existing UGAs such as Coupeville,
68 which does not have any unincorporated
69 UGA allocation under Alternative 4.

70 **Response:** While not strictly a SEPA
71 related question, it should be pointed out
72 that land capacity analysis has been
73 carried out and has been an important
74 part of the refinement of the current draft
75 plan. See the Draft Technical
76 Appendices.

77 **3. Issue:** CICC points out that page 115
78 states that "Alternative 2 will have the
79 most efficient system for utility, services

1 and transportation. Rural character
2 would receive the greatest protection
3 under this alternative Countywide
4 environmental impacts would likely be
5 less than with any other alternatives".
6 CICC points out that page 115 states that
7 Alternative 4 will have a greater impact
8 to the shoreline, additional fire and
9 sheriff services would be required and
10 impacts would be greater for schools,
11 and will lead to a gradual transition from
12 current character to a suburban
13 appearance. The conclusions on page
14 115 state that Alternative 4 will have the
15 least efficient systems of utilities,
16 services and transportation, less rural
17 character protection, and countywide
18 environmental impacts will be greater
19 than under Alternative 2.

20 **Response:** Comment acknowledged.

21 4. **Issue:** CICC points out that contrary to
22 a reference on page 25, only some parts
23 of the Ground Water Management
24 Program have been implemented.

25 **Response:** Comment acknowledged.
26 This has been recognized in the current
27 draft of the comprehensive plan. See the
28 Water element for discussions of surface
29 water issues.

30 **Response to the Central Whidbey Water** 31 **Resource Forum - Letter No. 8**

32 1. **Issue:** Disappointed that the Plan does
33 not emphasize the criticality of water
34 availability (especially in Central and
35 South Whidbey and Camano Island) as
36 one of the most significant factors in
37 future growth. Would like water issues
38 to be prominently considered.

39 **Response:** A Water Element has been
40 developed for the Draft Comprehensive
41 Plan.

42 **Response to Citizens for Sensible** 43 **Development (Dec. 16, 1996) - Letter No.** 44 **9**

45 1. **Issue:** CSD suggests adding the phrase
46 "including protection of the environment
47 and retention of the county's rural
48 character and lifestyles" after the words
49 "long term goals" on page 45 in the
50 next-to-last sentence of the first
51 paragraph.

52 **Response:** Comment acknowledged.

53 2. **Issue:** CSD points out that given the
54 now-known figure for septic failures
55 (1,887), it is now beyond argument that,
56 even after subtracting unbuildable lots,
57 there is still a significant excess of
58 buildable, unimproved lots in the county
59 which could accommodate a population
60 increase much larger than that
61 anticipated in the next 20 years.

62 **Response:** Comment acknowledged.

63 3. **Issue:** Please establish a consistent
64 nomenclature at the start of the
65 Environmental Analysis section and
66 stick to it throughout the Plan. It should
67 be consistent with the nomenclature used
68 by the Business Land Use Review
69 Committee. Please give recognizable
70 examples for each of the classifications.

71 **Response:** Comment acknowledged.

72 4. **Issue:** If all PRDs are PRCs, as the Plan
73 implies on page 108, then what keeps
74 each new PRD from becoming its own
75 node for additional future growth? This
76 is an invitation to sprawl. The Plan
77 needs to spell out how it will prevent
78 sprawl if new PRDs also become nodes
79 for future additional growth.

80 **Response:** See response (2) on page 3
81 of this document.

1 **5. Issue:** Referring to the Environmental
2 Consequences of Alternative 4 (page
3 109, bottom). CSD states that the Plan
4 is not credible in trying to minimize the
5 environmental consequences of
6 Alternative 4. The Plan states that "rural
7 landscape features and lifestyles would
8 be preserved through implementation of
9 policies which "strongly discourage rural
10 sprawl." CSD questions, what are the
11 policies? And who will propose,
12 approve and enforce them?

13 **Response:** The current Phase B Team
14 Draft contains policies and
15 implementation mechanisms in the Land
16 Use Element addressing how growth
17 will be concentrated in designated areas
18 of existing development. These include
19 designation criteria, which have been
20 incorporated into the draft zoning code
21 Title 17.03. See also SDEIS for the
22 Phase B Team Draft.

23 **6. Issue:** The Plan claims that Alternative
24 4 is "more realistic and responsive to the
25 demands and desires of new and existing
26 residents than the other alternatives."
27 Says who? The Plan admits that
28 Alternative 4 "would have the least
29 efficient systems of utilities, services and
30 transportation" (page 115) and would do
31 the least to preserve the rural character
32 of the Island (page 115). It admits that
33 Alternative 4 will gradually give RACs a
34 "suburban" look (page 114). By
35 allowing growth to occur peripherally
36 around PRCs, as well as by infilling
37 them, the plan presents by far the
38 greatest danger of sprawl of all the
39 planned growth alternatives. Who is this
40 responsive to, except perhaps some
41 developers and real estate agents? CSD
42 suggests a more balanced and credible
43 analysis of environmental consequences.
44 In particular, rewrite the third sentence

of the paragraph to read: "Rural
landscape features and lifestyles would
be preserved through implementation of
policies that actively contain urban
growth inside UGAs and PRCs."

Response: Comment acknowledged.

7. **Issue:** CSD states that the most serious
problem with Alternative 4 is that it
allows the boundaries of PRCs to expand
when infilling is far from complete. It's
simply not credible that this County will
meaningfully apply either the "20 acre"
rule (page 230) or the constraints of
water and sewer availability. Each new
PRD will become its own node of
growth. The tight, long-term constraints
on peripheral growth which could make
Alternative 4 workable are theoretically
do-able but politically are not going to
happen. Alternative 3, on the other
hand, will be seen as too restrictive by
many in the constituencies of the current
County leaders.

Response: See response (2) on page 3
of this document.

8. **Issue:** The generally sound mitigation
measures listed in pages 120 through
132 are all made meaningless since
every subsection begins with the words
"The following are potential mitigation
measures that the Comprehensive Plan
(and future regulatory efforts) could
implement". CSD suggests deleting this
clause wherever it occurs.

Response: See response (6) on page 4
of this document.

9. **Issue:** The GMA requires Counties to
take meaningful measures to protect
environmental quality, etc. With all its
current qualifiers (see #8 above), this
draft does not meet that requirement.

1 **Response:** Comment acknowledged.
 2 The County has drafted updated
 3 environmental regulations that are
 4 currently under review. The Draft
 5 Comprehensive Plan provides
 6 implementation measures, such as
 7 incentive programs, to preserve
 8 environmental features.

9 **Response to Citizens for Sensible**
 10 **Development (Dec. 18, 1996) - Letter No.**
 11 **10**

12 **1. Issue:** CSD suggests that the county
 13 create a "Long-term Ag and Forest
 14 Plan".

15 **Response:** Comment acknowledged.

16 **Response to Save the Woods on Saratoga**
 17 **(Dec. 24, 1996) - Letter No. 11**

18 **1. Issue:** Save the Woods on Saratoga
 19 concurs with the comments made by
 20 Citizens for Sensible Development
 21 (Dated December 16, 1996) on the Draft
 22 Comprehensive Plan and DEIS.

23 **Response:** Comment acknowledged.
 24 See responses to Letters No. 9 and No.
 25 10 in this section.

26 **Response to the Whidbey Audubon**
 27 **Society - Letter No. 12**

28 **1. Issue:** There is no baseline information
 29 on plants or animals or the impact that
 30 GMA Alternative 4 will have on them.

31 **Response:** Comment acknowledged.
 32 See response (5) on page 4 of this
 33 document.

34 **2. Issue:** The Whidbey Audubon Society
 35 strongly urges more and careful study of
 36 the issue of the impacts on large feeding,
 37 nesting and movements corridors.

38 **Response:** Comment acknowledged.

39 **3. Issue:** The impact on the marine habitat
 40 is not mentioned. The actions taken on
 41 the land can have a major impact on the
 42 marine wildlife.

43 **Response:** Comment acknowledged.

44 **4. Issue:** There is no mention made of
 45 impacts on species of local concern
 46 (such as bald eagle, pileated woodpecker
 47 and great blue heron). Which alternative
 48 has the least potential impact on these
 49 and other important species?

50 **Response:** Based on the comparison of
 51 alternatives presented in the DEIS
 52 Alternative 2 would generally have the
 53 least impact on the environment and this
 54 would presumably include species of
 55 local concern.

56 **Individuals**

57 **Response to Fran Abel and Edwin**
 58 **Anderson - Letter No. 13**

59 **1. Issue:** The Plan needs a strong and clear
 60 vision statement which includes the
 61 county's unique island character and the
 62 desire of the citizens to live in a farmed
 63 and forested, non-polluted rural area of
 64 the Puget Sound.

65 **Response:** A new vision statement has
 66 been prepared for the Phase B Team
 67 Draft.

68 **2. Issue:** The Plan must clearly identify
 69 and commit to the mitigation measures
 70 that will actually be used (Section IV.
 71 Environmental Summary, Mitigating
 72 Measures).

73 **Response:** See discussions in the
 74 SDEIS for the Phase B Team Draft of
 75 the Comprehensive Plan.

- | | |
|---|---|
| <p>1 3. Issue: The critical areas protection is</p> <p>2 too weak. View clearing in wetlands is</p> <p>3 unacceptable, especially without public</p> <p>4 review.</p> <p>5 Response: Comment acknowledged.</p> <p>6 4. Issue: There is no policy for preventing</p> <p>7 extinction of native species.</p> <p>8 Response: Comment acknowledged</p> <p>9 5. Issue: The Plan needs strong,</p> <p>10 ecologically based protection of</p> <p>11 wetlands and rare species, including</p> <p>12 native species.</p> <p>13 Response: Comment acknowledged.</p> <p>14 See discussions of environmental</p> <p>15 protection measures in the SDEIS for the</p> <p>16 Phase B Team Draft.</p> <p>17 6. Issue: The Plan commits the county to</p> <p>18 alternative water supply studies</p> <p>19 including importation of water,</p> <p>20 desalinization and distribution of water</p> <p>21 within the county. These are contrary to</p> <p>22 the wishes of a majority of island</p> <p>23 residents and have significant economic</p> <p>24 and environmental impacts.</p> <p>25 Sustainability, living within one's</p> <p>26 natural carrying capacity, needs to be</p> <p>27 part of the Plan.</p> <p>28 Response: Comment acknowledged.</p> <p>29 7. Issue: Words such as "potential",</p> <p>30 "when appropriate", "could", etc.</p> <p>31 weaken or make meaningless mitigation</p> <p>32 measures and protections for</p> <p>33 environmental quality, habitat, scenic</p> <p>34 and historic areas and critical areas,</p> <p>35 especially wetlands.</p> <p>36 Response: See response (6) on page 4</p> <p>37 of this document.</p> <p>38 8. Issue: There is a need to plan the</p> <p>39 county's economic and environmental</p> <p>40 future with equal strength. Data</p> | <p>41 indicates that destroyed environments</p> <p>42 result in destroyed economies.</p> <p>43 Response: Comment acknowledged.</p> <p>44 9. Issue: Preferred Alternative 4 is the</p> <p>45 most environmentally damaging of the</p> <p>46 "real" alternatives. It would have the</p> <p>47 least efficient system of utilities, services</p> <p>48 and transportation.</p> <p>49 Response: Comment acknowledged.</p> <p>50 Response to William R. Applegate -</p> <p>51 Letter No. 14</p> <p>52 1. Issue: The DEIS does not adequately</p> <p>53 address the problem of saltwater</p> <p>54 intrusion. The proposed PRCs are being</p> <p>55 located in the areas of existing saltwater</p> <p>56 intrusion.</p> <p>57 Response: Comment acknowledged.</p> <p>58 2. Issue: Referring to item 5, page 122,</p> <p>59 "Locate new wells inland, away from the</p> <p>60 coast and especially narrow points of</p> <p>61 land to reduce potential salt water</p> <p>62 intrusion". Will this be a requirement</p> <p>63 placed on PRCs if they need to develop</p> <p>64 new wells?</p> <p>65 Response: New wells will be required</p> <p>66 to conform to the County's regulations</p> <p>67 relative to issues of water quality and</p> <p>68 availability.</p> <p>69 Response to Kim Drury - Letter No. 15</p> <p>70 1. Issue: Notes that the options of</p> <p>71 desalinization and importing new water</p> <p>72 supplies would encourage more</p> <p>73 development in order to spread their</p> <p>74 associated costs. They could also have</p> <p>75 significant unintended environmental</p> <p>76 consequences to existing water supplies</p> <p>77 and drainage systems.</p> <p>78 Response: Comment acknowledged.</p> |
|---|---|

- 1 **2. Issue:** Allowing 2.5 houses per acre 43 Draft Comprehensive Plan and
- 2 (Shoreline Residential PRDs) will result 44 associated Technical Appendices. See in
- 3 in more sprawl, degrading the rural 45 particular the Land Use, Water, and
- 4 character of the county. 46 Transportation elements.
- 5 **Response:** Comment acknowledged.
- 6 **3. Issue:** The Plan should contain a long- 47 **Response to Dean Enell - Letter No. 16**
- 7 term agriculture and forest plan for the 48 **1. Issue:** Fully Contained New
- 8 county, providing incentives and credits 49 Communities should be eliminated from
- 9 for maintaining these uses. 50 the Plan. The county does not have
- 10 **Response:** Comment acknowledged. 51 ground water resources to support such
- 11 Incentives have been included in the 52 localized development.
- 12 current drafts of the comprehensive plan 53 **Response:** See response #3 on page 4 of
- 13 and development regulations. See 54 this document.
- 14 discussions in the SDEIS for the Phase B 55 **2. Issue:** The protection offered for
- 15 Team Draft and development 56 wetlands in the Plan is far too hazy; it
- 16 regulations. 57 should be made more specific.
- 17 **4. Issue:** The Plan should strengthen 58 **Response:** Comment acknowledged.
- 18 mitigation measures and protections for
- 19 environmentally quality, habitat, scenic
- 20 and historic areas and critical habitats.
- 21 There are currently few meaningful
- 22 protections for wetlands and rare
- 23 species. It is critical for the Plan to
- 24 maintain the strongest protection for
- 25 wetlands and groundwater recharge
- 26 areas.
- 27 **Response:** Comment acknowledged.
- 28 **5. Issue:** Encourages the County to revisit 67 **Response:** Comment acknowledged.
- 29 some of the Plan's most basic elements 68 **2. Issue:** Compliments the county's
- 30 to better reflect the link between 69 current water planning efforts. States
- 31 environmental protection and sustainable 70 that the county must figure out how
- 32 development; to ensure that Whidbey 71 much ground water can be safely tapped
- 33 and Camano Islands retain their rural 72 into, while not waiting until disaster
- 34 character, and to ensure that the values 73 strikes in the form of salt water intrusion
- 35 of already developed properties are not 74 (of which already has occurred).
- 36 degraded due to many impacts of 75 **Response:** Comment acknowledged.
- 37 increased development including sprawl,
- 38 lack of available water supply and 76 **3. Issue:** States that wetlands are an
- 39 increased traffic. 77 absolute necessity to a healthy
- 40 **Response:** Comment acknowledged. 78 environment.
- 41 Subsequent information and analysis has 79 **Response:** Comment acknowledged.
- 42 been provided in the Phase B Team

1 **Response to Pete and Betsy Friedman -**
2 **Letter No. 18**

3 1. **Issue:** Concur in entirety with the
4 comments submitted by Citizens for
5 Sensible Development dated December
6 16, 1996.

7 **Response:** Comment acknowledged.

8 2. **Issue:** Concerned with policies on
9 unrestricted ability to land helicopters
10 and seaplanes with very little oversight
11 or sensitivity to the right of peaceful
12 enjoyment of one's property.

13 **Response:** Comment acknowledged.

14 3. **Issue:** Business Park zoning is not
15 appropriate outside of existing urban
16 growth areas and is contrary to the
17 Growth Management Act.

18 **Response:** While not strictly a SEPA
19 issue, it should be noted that the
20 Business Park land use designation has
21 been eliminated.

22 4. **Issue:** There is no discussion of any sort
23 of design review or other development
24 regulations that will preserve the
25 character of the islands rather than
26 surrendering the landscape to the
27 franchise monotony of any strip
28 development anywhere.

29 **Response:** See discussions in the
30 SDEIS for the Phase B Team Draft and
31 regulations.

32 5. **Issue:** What are the mitigation measures
33 for the interface between residential and
34 non-residential areas. Current
35 regulations are inadequate if one views
36 the current business expansion in
37 Freeland as an example.

38 **Response:** : See discussions in the
39 SDEIS for the Phase B Team Draft and
40 regulations.

41 **Response to Jay G. Hale - Letter No. 19**

42 1. **Issue:** Mr. Hale states that the most
43 significant deficiency in this DEIS is the
44 lack of specificity in the description of
45 the environmental impacts. WAC 197-
46 11-442 does allow for less detailed
47 analysis for nonproject proposals but it
48 does require sufficient detail
49 commensurate with the scope of the
50 project so that the alternatives can
51 reasonably be compared. Mr. Hale
52 questions how a lay person can
53 environmentally evaluate the difference
54 between a choice with one municipal
55 UGA and a choice with one municipal
56 UGA and from three to six non-
57 municipal (no local control) without
58 knowing if there is enough water to
59 support any or all of them? The same
60 questions arise about transportation,
61 urban services, and environmental
62 controls.

63 **Response:** See response (5) on page 4
64 of this document.

65 2. **Issue:** Mr. Hale states that there is not
66 enough specificity on the requirement
67 for mitigating conditions in the Plan. If
68 any one of the alternatives is enacted as
69 in this draft, it will become the
70 authorization for future project zoning
71 which will result in future development
72 with the real probability that the
73 suggested mitigating conditions will
74 never be implemented because they are
75 offered as suggestions (see pages 120
76 through 132).

77 **Response:** See discussions in the
78 SDEIS for the Phase B Team Draft,
79 which relates proposed actions to the
80 listed mitigation measures.

81 3. **Issue:** Mr. Hale states that Alternative 4
82 appears to contain project specific

- 1 zoning with no corresponding EIS. Of 43 environmental impacts from neighboring
2 particular concern to us is the 44 parcels and/or the community at large
3 designation of the Nichols Brothers Boat 45 without compensation". The non-
4 Builders' (Nichols Brothers) property to 46 enforcement policy in Island County has
5 LMS (Figure A.8) without a project 47 largely negated efforts (mitigating
6 specific EIS or mitigating conditions. 48 conditions and zoning codes) to diminish
7 **Response:** A project specific EIS is not 49 the negative impacts to the elements of
8 a required since the establishment of 50 the environment listed in WAC 197-11-
9 land use designations during the 51 444. The non-enforcement case he cites
10 development of a comprehensive plan 52 is the Nichols Brothers development.
11 are non-project actions under SEPA. 53 **Response:** Comment acknowledged.
- 12 4. **Issue:** Mr. Hale states that Business and 54 **Response to Karen Hamalainen - Letter**
13 Office Parks (BOP) (no definition in the 55 **No. 20**
14 Glossary) and Light Industrial/Business
15 Parks are generally considered urban
16 activities which require support of both
17 urban activities and urban services. He
18 questions how can new BOPs be
19 proposed outside of UGAs and how can
20 the environmental impacts of this be
21 evaluated by a lay person with the detail
22 of information provided?
23 **Response:** Business Parks are no longer
24 part of the comprehensive plan.
- 25 5. **Issue:** What impacts to the 56 1. **Issue:** Recommends that for
26 transportation system are created by 57 Alternatives 2, 3, and 4, the Plan should
27 permitting commercial development to 58 clearly designate the "built-up"
28 be divide by a principal State highway? 59 residential and commercial areas and
60 plan on how to in-fill these areas and
61 encourage each type to continue
62 developing its "special nature".
63 **Response:** Comment acknowledged.
- 29 **Response:** Transportation impacts are 64 2. **Issue:** Points out that the existing PRCs,
30 discussed and mitigated within the 65 which have space for in-fill potential, are
31 Transportation Element of the current 66 not necessarily located where growth
32 plan draft. There would likely be safety 67 may be best handled (outside of critical
33 issues concerned with turning 68 areas, where they are less costly to the
34 movements across the highway, which in 69 sole source aquifer).
35 some cases would require installation of
36 signal lights. 70 **Response:** Comment acknowledged.
71 See also the two SDEISs for discussions
72 of changes in land use designations,
73 reductions in the number of areas
74 receiving development, and updated
75 environmental regulations.
- 37 7. **Issue:** There needs to be an analysis of 76 **Response to Rebecca Heil - Letter No. 21**
38 the environmental impacts of non- 77 1. **Issue:** Objects to the proposed Holmes
39 enforcement of land use regulations and 78 Harbor development in the plan.
40 the violation of "Neighbors Rights". Mr. 79 Concerned about water availability,
41 Hale's definition of "Neighbors Rights" 80 sewage treatment, high density
42 is "not having to accept the

1 development and resultant impact on
2 roads and services.

3 **Response:** See response (3) on page 4
4 of this document.

5 **Response to H. James Howe (Dec. 20,**
6 **1996) - Letter No. 22**

7 **1. Issue:** Plan and DEIS does not describe
8 the biological resources and ecological
9 associations which form the biological
10 base for the ecosystems which are
11 encompassed within the lands and
12 marine waters of the county.

13 **Response:** Comment acknowledged.

14 **2. Issue:** The Plan and DEIS deal only
15 with the portion of the county which is
16 primarily dry land. There is a lack of
17 analysis of impacts upon the submerged
18 land or marine resources within the
19 county.

20 **Response:** Comment acknowledged.

21 **3. Issue:** The Plan and DEIS appear to be
22 based upon the assumption that growth
23 does not pose a threat to the
24 environment.

25 **Response:** Comment acknowledged.

26 **Response to H. James Howe (Dec. 20,**
27 **1996) - Letter No. 23**

28 **1. Issue:** The entire vision statement
29 suggests that the retention of a "rural
30 environment" to involve only retaining
31 visual effect of farms, fields, trees and
32 forests. The public wants more than just
33 a rural appearance, but wants to protect
34 the biodiversity, function and stability of
35 the entire ecosystem within the county.

36 **Response:** Comment acknowledged.

37 **Response to H. James Howe (Dec. 26,**
38 **1996) - Letter No. 23**

39 **1. Issue:** Regarding page 104, on the
40 location of fully contained new
41 communities in Central Whidbey and on
42 Camano Island; it is not the function of
43 the DEIS to decide what form of new
44 development is required and these
45 statements should be removed. The
46 function of the DEIS is to identify and
47 describe environmental impacts, and is
48 not to specify where specific types of
49 development is to be placed.

50 **Response:** See response (3) on page 4
51 of this document. Also, the Draft Land
52 Use Element and the DEIS are an
53 integrated document as allowed under
54 SEPA. The environmental review in
55 that document does not prescribe types
56 or locations of land uses.

57 **Response to Jeanne Hunsinger - Letter**
58 **No. 25**

59 **1. Issue:** Notes that the glossary on page
60 268 defines preserve as "To maintain
61 unchanged; to keep or maintain intact".

62 **Response:** Comment acknowledged.

63 **2. Issue:** Points out cases where the term
64 "preserve" is used. The examples are:
65 page 128, line 9; page 126, line 21; page
66 124, line 10; page 123, line 10; page
67 123, line 13; and page 109, line 28.
68 Notes that in previous Planning
69 Commission discussion, the term
70 "conserve" be used instead of
71 "preserve". Request that generally the
72 term "conserve" be used in place of
73 "preserve" throughout the document.

74 **Response:** Comment acknowledged.

1 **Response to K. Kelzer - Letter No. 26**

2 1. **Issue:** The specific inclusion of the
3 Harbor Farms proposal on page 230 of
4 the Plan is objectionable because it
5 would essentially be putting one high
6 density development next to another
7 (existing golf course and homes).
8 Water, sewage and traffic impacts have
9 not been done prior to the inclusion of
10 the Harbor Farms development in the
11 Plan.

12 **Response:** Comment acknowledged.

13 **Response to Maxine Keesling - Letter No.**
14 **27**

15 1. **Issue:** Regarding Groundwater
16 Infiltration (p. 43): The statement about
17 the removal of vegetation reducing water
18 infiltration is belied by an article in the
19 8-16-88 South Whidbey Record which
20 quoted Department of Ecology experts
21 who said that clearcutting properly
22 executed, leads to more water in the
23 area. Hydrologist Art Larson said
24 "When you remove the trees you get
25 more water . . . Timber harvest does
26 increase the annual water yield." The
27 same paper in the summer of 1993 said,
28 in an article on outdoor burning: "Lewis
29 went into the woods . . . and found . . .
30 'In tilled soil we had about one inch of
31 penetration-and in undisturbed oil it
32 (water) penetrated one-quarter inch.
33 Under trees and logs it is still dry,'
34 Lewis said." Since physical
35 demonstration ranks among the "best
36 available science" required under GMA,
37 the Plan statement about vegetation and
38 groundwater infiltration should be
39 removed.

40 **Response:** Comment acknowledged.

41 2. **Issue:** Regarding Potential Mainland
42 Water Sources (p. 65): This appears to
43 reference the Skagit River. If so, Island
44 County should keep an eye on Northwest
45 Straits National Marine Sanctuary
46 proposed designation, as the sponsoring
47 groups are anti-diversion of water from
48 the rivers.

49 **Response:** Comment acknowledged.

50 3. **Issue:** Regarding Sewer/Septage
51 Systems (pp 131 & 151): Well-
52 functioning onsite septic systems are
53 considered preferable to sewers because
54 they contribute to groundwater recharge,
55 at least in areas where recharge is
56 desired. Whidbey is such an area.

57 **Response:** Comment acknowledged.

58 4. **Issue:** Regarding Air Pollution Control
59 Standards (p. 139): Please don't prohibit
60 outdoor burning, at least not unless it
61 includes the Navy which periodically
62 sends up pillars of black smoke from
63 outdoor burning at Ault Field.

64 **Response:** Comment acknowledged.

65 5. **Issue:** Regarding Possible Harmful
66 Effects of Transmission Lines (p. 153):
67 The county should eliminate this
68 reference to "possible harmful effects"
69 because of research to the contrary.

70 **Response:** Comment acknowledged.

71 6. **Issue:** Regarding the definition of
72 Wetlands (p. 185): A more current
73 definition, with exclusions, was adopted
74 by the 1995 Legislature in ESB 5776.
75 The definition in the Plan should be
76 replaced with the new definition as
77 found in RCW 36.70A.030.

78 **Response:** The current definition of
79 wetland used in County plans and
80 regulations has been updated consistent

1 with that established by the Department
2 of Ecology and State legislation.

3 **Response to Jacqueline King - Letter No.**
4 **28**

5 1. **Issue:** Questions the purpose of the
6 downzoning of Camano Island. When it
7 comes to safeguarding the environment
8 and water quality of our area, a sense of
9 stewardship for the land is far more
10 crucial to the community's future than
11 lot size.

12 **Response:** Comment acknowledged.

13 **Response to Tim and Linda Minter -**
14 **Letter No. 29**

15 1. **Issue:** The Comprehensive Plan must
16 include "mandatory" protections for
17 environmentally sensitive areas such as
18 wetlands, steep slopes, streams and rare
19 species habitats.

20 **Response:** Current drafts of the
21 comprehensive plan and development
22 regulations contain mandatory
23 provisions for environmentally sensitive
24 areas. See discussions in the SDEIS for
25 the Phase B Team Draft and
26 development regulations. In particular,
27 environmental overlay zones are
28 established in the draft zoning code.

29 2. **Issue:** View clearing of wetlands should
30 not be allowed.

31 **Response:** Comment acknowledged.

32 3. **Issue:** Do not expand aircraft noise
33 zones beyond the present boundaries or
34 noise levels.

35 **Response:** Comment acknowledged.

36 4. **Issue:** Private helicopter landings must
37 be allowed only at airports and industrial
38 sites.

39 **Response:** Comment acknowledged.

40 5. **Issue:** The Plan should commit the
41 county government to make the
42 conservation of energy (such as
43 electricity, natural gas, propane, oil and
44 gasoline) and resources (such as water,
45 gravel and trees) a priority in the
46 planning of new developments.

47 **Response:** Comment acknowledged.

48 **Response to Michael and Bobbie Morton -**
49 **Letter No. 30**

50 1. **Issue:** Agree with policies and
51 strategies to protect existing airports
52 from encroachment by inappropriate
53 development and notification of land
54 owners within airport noise impact areas
55 be notified of potential noise impacts.

56 **Response:** Comment acknowledged.

57 2. **Issue:** On page 124, item 3 under
58 Environmental Measures, italicize the
59 words "quiet rural character" for
60 emphasis.

61 **Response:** Comment acknowledged.

62 3. **Issue:** On page 124, item 2 under
63 Environmental Measures, delete the
64 word "facilities" and add "and by
65 requiring all aircraft to operate from
66 designated airports".

67 **Response:** Comment acknowledged.

68 **Response to Gary A. Piazzon (Dec. 26,**
69 **1996) - Letter No. 31**

70 1. **Issue:** Notes that in the Vision
71 Statement "preserving rural and small
72 town character and specific elements that
73 establish that character was the number
74 one concern among people from both
75 Whidbey and Camano Islands" (page
76 13). Notes further that on page 115,

1 Alternative 4 would afford "less rural
2 character protection" and "have the least
3 efficient systems of utilities, services and
4 transportation of the planned growth
5 alternatives". And finally points out that
6 "economic growth is the least impacted
7 under this alternative".

8 **Response:** Comment acknowledged.

9 2. **Issue:** Agrees with the Plan's
10 assessment of the thirteen negative
11 impacts of growth on the quality of life
12 (page 88). Feels that Alternative 4 does
13 the least to mitigate these impacts.

14 **Response:** Comment acknowledged.

15 3. **Issue:** Points out that the
16 encouragement of PRCs will increase air
17 pollution, road expansion, traffic lights
18 and impervious surfaces, because it
19 inherently emphasizes automobile
20 reliance.

21 **Response:** See response (2) on page 3
22 of this document.

23 4. **Issue:** Points out that the encouragement
24 of PRCs will increase the degradation
25 and depletion of aquifers due to the lack
26 of sanitary sewage treatment systems
27 and because there are no incentives for
28 conservation.

29 **Response:** Comment acknowledged.

30 5. **Issue:** Points out that the encouragement
31 of PRCs will accelerate the
32 environmental impacts on plants and
33 animals indigenous to the county,
34 including its marine waters.

35 **Response:** Comment acknowledged.

36 6. **Issue:** Pertaining to the section on
37 mitigating measures; the repetitive use
38 of the term "could implement ..." is
39 vague and non-directive.

40 **Response:** See response (6) on page 4
41 of this document.

42 7. **Issue:** A glaring oversight was not
43 changing the current shoreline zoning
44 from high density residential to a lower
45 density that reflects how critical this area
46 is to the environment.

47 **Response:** Comment acknowledged.
48 The Shoreline Management Master
49 Program and associated regulations have
50 been updated and are currently under
51 review.

52 **Response to William Porter - Letter No.** 53 **32**

54 1. **Issue:** The proposed plan totally
55 neglects to address specific effects
56 caused by the plan.

57 **Response:** See response (5) on page 4
58 of this document.

59 2. **Issue:** The DEIS is a total non sequitur
60 with respect to water, transportation and
61 sanitation issues, on Camano Island
62 specifically.

63 **Response:** Comment acknowledged.

64 3. **Issue:** It is impossible to comment on
65 environmental issues relating to the
66 DEIS when no specific impact
67 statements are presented in the DEIS.

68 **Response:** See response (5) on page 4
69 of this document.

70 **Response to Thomas J. Roehl - Letter No.** 71 **33**

72 **Issue:** Mr. Roehl's letter contains
73 numerous comments that essentially
74 point out that Alternative 1(No Action)
75 has not been fully developed. That the
76 existing plan (1984 Comprehensive
77 Plan) would conform to requirements of

1 GMA and environmental protection if
 2 the County's development regulations
 3 were actually enforced. He also points
 4 out that several specific panning issues
 5 have not been fully investigated, for
 6 example an analysis of buildable lands.
 7 **Response:** Comments acknowledged.
 8 See responses to Public Testimony on
 9 the following pages. See also the
 10 SDEISs Phase A and Phase B Team
 11 Drafts and the Draft Technical
 12 Appendices currently under review.

13 **Response to Rufus R. Rose - Letter No. 34**

14 **1. Issue:** There is question of clarification
 15 regarding the statement in the Draft
 16 Comprehensive Plan/DEIS statement
 17 that "... decision makers will likely
 18 consider the economic and social
 19 impacts of the proposal which are not
 20 addressed within the DEIS".
 21 **Response:** SEPA does not require
 22 analysis of socio-economic impacts in
 23 the formulation of a DEIS. What is
 24 meant by the statement is that the
 25 County will (and has) taken these issues
 26 into consideration during development
 27 of the complete comprehensive plan.

28 **2. Issue:** The Plan should comply with
 29 RCW 43.21H, State Environmental
 30 Policy.
 31 **Response:** Comment acknowledged.

32 **3. Issue:** The environmental analysis
 33 appears not to be an analysis of existing
 34 evidence, rather speculation about what
 35 "can", "could" or "may" happen based
 36 on undocumented conjecture.
 37 **Response:** Comment acknowledged.

38 **4. Issue:** Alternatives 2, 3 and 4 presume
 39 ultimate sewer and water services
 40 enlargements which probably exceed the

41 political interests of the citizens of
 42 Coupeville and Langley.
 43 **Response:** Comment acknowledged.

44 **5. Issue:** Comprehensive review of the
 45 Plan and the integrated DEIS is
 46 impossible without having the draft
 47 implementing codes completed.
 48 **Response:** Comment acknowledged.
 49 Draft development regulations are now
 50 available for review. See SDEIS for the
 51 Phase B Team Draft and development
 52 regulations.

53 **6. Issue:** Does the DEIS and the public
 54 comments received preclude additional
 55 opportunity for additional comments
 56 prior to the FEIS?
 57 **Response:** See response (1) on page 3
 58 of this document.

59 **Response to Michael Serinoff - Letter No.**
 60 **35**

61 **1. Issue:** Too much language in the
 62 sections on environmental protection of
 63 wetland, etc. does not contain the same
 64 strong, direct language used in other
 65 sections, such as those in economic
 66 development. "Should" and "ought to"
 67 must be replaced by "must" and
 68 "required to".
 69 **Response:** See response (6) on page 4
 70 of this document.

71 **Response to Jon D. Stoneman - Letter No.**
 72 **36**

73 **1. Issue:** States that Alternative 4 is the
 74 "best" of the four alternatives.
 75 **Response:** Comment acknowledged.

76 **2. Issue:** The statement on page 121, item
 77 5 of the draft Plan, "Establish wood

1 stove emissions that exceed current state
2 standards" should be eliminated. Island
3 County wood stove emission standards
4 should be the same as the state's
5 standards.

6 **Response:** Comment acknowledged.

7 **3. Issue:** Referring to page 121, item 8.
8 Island County does not need to establish
9 emission standards for new industrial
10 and commercial that exceed state and
11 federal standards. Island County
12 standards should be the same as for the
13 state.

14 **Response:** Comment acknowledged.

15 **4. Issue:** Referring to page 122, item 9.
16 Island County should have standards for
17 the installation of new septic systems
18 and for maintenance and inspection of
19 existing septic systems that are the same
20 as state standards.

21 **Response:** Comment acknowledged.

22 **5. Issue:** Referring to page 122, item 3.
23 Island County should not discourage
24 small water systems.

25 **Response:** Comment acknowledged.

26 **6. Issue:** Items 1 and 2 under Light and
27 Glare on page 126 should be eliminated
28 with reliance placed on item 3.

29 **Response:** Comment acknowledged.

30 **7. Issue:** Item 3 under Light and Glare on
31 page 126 could be defined as number of
32 lumens on a vertical surface at the
33 property line.

34 **Response:** Comment acknowledged.

35 **8. Issue:** Agrees with item 4 under
36 Aesthetics on page 126 regarding
37 limiting strip development.

38 **Response:** Comment acknowledged.

39 **Response to Charles H. Stromberg -**
40 **Letter No. 37**

41 **1. Issue:** Recommends coordination of all
42 nine volumes of the Comprehensive
43 Plan, paying special attention to the
44 Shoreline Plan. The plans of the Cities
45 and Towns must be coordinated
46 including the regulations for
47 implementation. Please consider adding
48 a Conservation Plan which is allowed by
49 the Statutes.

50 **Response:** Comment acknowledged.
51 Development of the comprehensive plan
52 has included the remaining plan
53 elements, including an updated
54 Shoreline Master Program. Other plans
55 have been reviewed and considered in
56 the development of the current plan
57 draft.

58 **2. Issue:** The integration of the
59 environmental layers of the plan must
60 relate to water aquifer recharge, water
61 well quality, salt water intrusion, septic
62 pollution of the ground and water
63 supply, shoreline ecology, ocean
64 ecology, stream ecology for fish and
65 animals, wild life ecology, and plant
66 ecology.

67 **Response:** Comment acknowledged.
68 See discussions in the SDEIS for the
69 Phase B Team Draft and development
70 regulations.

71 **3. Issue:** The Plan must justify that each
72 year of the projected development can be
73 accommodated by the carrying capacity
74 of the land; the governmental facilities
75 provided by the State, County, Towns,
76 City and special districts; as well as the
77 private utility companies and community
78 associations. This includes level of
79 service calculations for transportation
80 and other facilities. This requirement

1 includes approved long range capital
2 facility budgets, with adequate
3 earmarked funding available. The State
4 refusal to fund the "concurrent" capital
5 needs of the County is a key issue.

6 **Response:** This has been provided in
7 the Capital Facilities and Transportation
8 elements of the proposed plan.

9 4. **Issue:** Regarding the water constraint in
10 the county; use reliable data so new
11 development does not steal water from
12 existing wells. Salt water intrusion is
13 very real on Whidbey Island now!

14 **Response:** Comment acknowledged.

15 **Public Testimony**

16 Note that most of the responses to public
17 testimony were provided Mr. Moore,
18 Planning Director, during the public
19 hearings. These have been incorporated
20 below.

21 **Response to Peter Borden (Planning** 22 **Borden) (Dec. 12, 1996) - Public** 23 **Testimony No. 1**

24 1. **Issue:** Mr. Borden noted that on Pg.
25 186, under Wetlands Policies, C. it
26 states, "Consider all economic,
27 environmental, and cultural costs when
28 evaluating proposals for wetland
29 alterations...". He asked what the
30 definition of cultural costs was.

31 **Response:** Mr. Moore said aesthetics
32 and loss of visual elements. He noted
33 that they could delete the term cultural.

34 **Response to John Hitt (on behalf of Island** 35 **County Economic Development Council)** 36 **(Dec. 12, 1996) - Public Testimony No. 2**

37 1. **Issue:** He said he felt that they were not
38 very far away from the technological
39 answers to no-perc lots.

40 **Response:** Comment acknowledged.

41 **Response to Norm McConnaughey (Dec.** 42 **12, 1996) - Public Testimony No. 3**

43 1. **Issue:** Mr. McConnaughey asked how
44 the \$25,000 improvement threshold was
45 derived to determine parcels that were
46 considered "developed".

47 **Response:** The threshold was arrived
48 following discussions with the Island
49 County Assessor, who determined that
50 \$25,000 of improvements was an
51 appropriate level for determining what
52 parcels were developed and
53 undeveloped.

54 **Response to William Porter (Dec. 12,** 55 **1996) - Public Testimony No. 4**

56 1. **Issue:** Mr. Porter said he thought the
57 population figures that the plan is based
58 on are erroneous and the presently
59 designed zones cannot support the
60 utilities. He said reconciliation of the
61 water plan against this proposed
62 Comprehensive Plan has not been made.
63 He said the DEIS is disingenuous in that
64 its reconciliation with the physical and
65 environmental effects of the proposed
66 planning have not been considered.

67 **Response:** Comment acknowledged.

68 2. **Issue:** Mr. Porter made note of the
69 many studies done in regards to
70 groundwater in Island County which
71 have not been reconciled with the

1 Comprehensive Plan. In regards to
2 importing water, there is no water on the
3 other side of Camano that does not have
4 water rights applied to it. He said with
5 constraints the present plan can be made
6 to comply with the GMA far more
7 effectively then the total rezone that is
8 going on.

9 **Response:** Mr. Moore pointed out that
10 if they do not downzone and change the
11 densities they will continue to encourage
12 salt water intrusion and withdrawal of
13 the groundwater.

14 **Response to Bill Thorn (Dec. 12, 1996) -**
15 **Public Testimony No. 5**

16 1. **Issue:** Mr. Thorn said that Alternative 2
17 was a more favorable choice then
18 Alternative 4. Alternative 4 states that it
19 would have the least efficient systems of
20 utilities, services and transportation, and
21 the least rural character protection. It
22 does note that economic growth is least
23 impacted in Alternative 4 which would
24 seem to be its singular attribute.
25 Alternative 2 states that it has the most
26 efficient system of utilities, services and
27 transportation and rural character would
28 receive the greatest protection under this
29 alternative. He also noted that under the
30 population distribution in Alternative 4,
31 43% is allocated to the incorporated
32 areas and 57% to the unincorporated
33 rural areas of the county. In Alternative
34 2 the split is 80% in the incorporated and
35 20% in the unincorporated which he
36 thought was a better assumption.

37 **Response:** Alternative 4 provides
38 reasons as to why Alternative 2 was not
39 the preferred alternative. The primary
40 one being the requirement to really in
41 essence force people to live in the cities
42 of Island County which would be

43 draconian downzoning of all the rural
44 lands in the County. The goal of the
45 Plan is not to spread suburban
46 development across the county but to
47 make the existing dispersed centers more
48 compact.

49 2. **Issue:** Mr. Thorn asked for an
50 explanation of the population allocation
51 process. He pointed out that Camano
52 Island is projected to experience an
53 increase of about 6,100 people, or 19%
54 of the total county projection, which
55 represents a 71% increase in the
56 population. In contrast North Whidbey
57 is looking at 38%, Central Whidbey 38%
58 and South Whidbey 64 %.

59 **Response:** The methodology for the
60 population allocation was to take a look
61 historically at what has been taking place
62 in the county. The relative share of the
63 overall county population of both
64 Camano and South Whidbey have
65 increased relative to Central Whidbey
66 which has remained stable and North
67 Whidbey which has declined. Future
68 population adjustments were made in
69 tune with this because looking at the
70 proximity of Camano and South
71 Whidbey to the mainland in terms of
72 accessibility it seemed that those areas
73 were going to continue to take the
74 majority of the new growth.

75 **Response to Richard Wright (Dec. 12,**
76 **1996) - Public Testimony No. 6**

77 1. **Issue:** Mr. Wright asked Vince Moore
78 (Planning Director) to explain the
79 history behind choosing Alternative 4.

80 **Response:** Mr. Moore said SEPA
81 requires an evaluation of alternatives.
82 One of the alternatives that you are
83 required to evaluate is what is called the

“no action” alternative which under the GMA is not a logical alternative. Three other alternatives were considered; one was taking the population figure allocated to Island County by the OFM and directing it to cities and their designated urban growth areas; another alternative was to direct the growth into UGAs as well as RACs, with some expansion in the PRCs; the last alternative was to direct the growth more evenly to UGAs, RACs, and the existing PRCs. He noted that Alternative 4 more accurately accounts for the current pattern of development in the County, but constrains further expansion of this pattern in a manner that would result in sprawl.

2. Issue: Mr. Wright said he felt that Alternative 2 was the only way to go with one modification and that is to recognize the PRCs in reference to the infilling. He said he thought they could accommodate all the infilling on Camano Island in the existing PRCs.

Response: Mr. Moore said the calculations that were made were based on the initial analysis of all these communities as they exist now and did not show any slack. The reality is that we do not know how many of these infill lots are on the market or available to the public. We are not sure how many are being held by private parties for long term bequest purposes or how many actually do perk.

PHASE A TEAM DRAFT LAND USE ELEMENT March 9, 1998

State Agencies

Response to State Department of Transportation - Letter No. 1

Issue: DOT points out that its comments are limited due to the fact that not all of the plan elements are completed, i.e. Capital Facilities and Transportation. They would like to coordinate with the County on transportation issues and has submitted information relative to transportation modes and capacity issues to.

Response: The Transportation and Capital Facilities elements have been completed and are under review. The County has incorporated the information submitted into its analysis and planning for transportation issues.

Regional Agencies/Governments

Response to City of Langley - Letter No. 2

Issue: The City questions whether the November 12, 1996 Staff Draft qualifies as both a land use element and a draft EIS, stating that the format does not meet EIS requirements and, therefore, the Supplemental DEIS may also not be a valid environmental review document.

Response: See discussion of SEPA/GMA integration at the beginning of this document.

Organizations

Response to Land Strategies - Letter No. 3

Issue: The SDEIS should include discussion of impacts from Master Planned Resorts.

Response: Comment acknowledged.

Response to Whidbey Islanders for a Sound Environment - Letter No. 4

- 1 **Issue:** Concurs with William R.
2 Applegate's letter of April 3, 1998.
3 **Response:** Comment acknowledged.
- 4 **Response to Camano Island Community**
5 **Council - Letter No. 5**
- 6 **Issue:** The SDEIS is incomplete in
7 describing individual elements and lacks
8 mitigating measures required of an
9 environmental document.
- 10 **Response:** Individual plan elements are
11 now complete and under review. There was
12 a list of potential mitigation measures
13 developed in the DEIS. Please see
14 discussions in the SDEIS for the Phase B
15 Team Draft Comprehensive Plan and
16 development regulations.
- 17 **Response to Island County Citizens'**
18 **Growth Management Coalition - Letter**
19 **No. 6**
- 20 **Issue:** The SDEIS is basically a restatement
21 of the former EIS and does not acknowledge
22 that the proposed land use element is "very
23 different" from the previous Staff Draft, and
24 that no mitigation measures are provided.
- 25 **Response:** Comment acknowledged.
26 Mitigation measures were provided in the
27 DEIS. Current drafts of the comprehensive
28 plan and development regulations contain a
29 variety of prescriptive mitigation measures.
30 Please see discussions in the SDEIS for the
31 Phase B Team Draft and development
32 regulations.
- 33 **Individuals**
- 34 **Response to William R. Applegate -**
35 **Letter No. 7**
- 36 1. **Issue:** A completely new EIS should
37 be prepared since the current land use
38 element draft "differs in many ways" from
39 the previous draft, i.e. use of RAIDs, greater
40 population, elimination of TDRs, and a
41 greater proportion of being accommodated
42 outside of UGAs.
- 43 **Response:** Comment acknowledged.
- 44 2. **Issue:** The SDEIS does not address
45 issues associated with designating 70 RAIDs
46 including potable water, surface water,
47 sewage, traffic, solid waste, and public
48 services in general.
- 49 **Response:** The number of residential
50 RAIDs has been reduced to 41 after review
51 of water and sanitation issues. Please see
52 the SDEIS for the Phase B Team Draft
53 Comprehensive Plan and development
54 regulations.
- 55 **Response to H. James Howe #1 - Letter**
56 **No. 8**
- 57 1. **Issue:** The SDEIS is not written for
58 the current draft of the comprehensive plan.
- 59 **Response:** Comment acknowledged.
- 60 2. **Issue:** The SDEIS does not identify
61 the "threats to the environment".
- 62 **Response:** Unavoidable environmental
63 impacts were outlined in the DEIS.
- 64 **Response to H. James Howe #2 - Letter**
65 **No. 9**
- 66 1. **Issue:** The remaining plan elements
67 must be completed before an environmental
68 review can be conducted.
- 69 **Response:** Comment acknowledged. The
70 remaining plan elements have been
71 completed and are now under review.
- 72 **Response to Ellen Meyer - Letter No. 10**
- 73 **Issue:** SEPA review should be suspended
74 until all the plan elements are completed.
- 75 **Response:** See response to Letter No. 9
76 above.

- 1 **Public Testimony**
- 2 **Response to Steve Erickson - Public**
- 3 **Testimony #1**
- 4 **Issue:** What is the justification for a phased
- 5 review?
- 6 **Response:** See discussions at the beginning
- 7 of this document on page 1 and 2.
- 8 **Response to Bill Thorn - Public**
- 9 **Testimony #2**
- 10 **Issue:** SEPA review should be suspended
- 11 until all parts of the plan are available for
- 12 public review.
- 13 **Response:** See response to letter N. 9
- 14 above.
- 15 **Response to Tom Roehl - Public**
- 16 **Testimony #3**
- 17 **Issue:** The SEPA comment period should
- 18 be extended and the SDEIS does not reflect
- 19 the changes made to the plan.
- 20 **Response:** Comment acknowledged. See
- 21 also response (1) on page 3 of this
- 22 document.
- 23
- 24 **PHASE B TEAM DRAFT COMPREHENSIVE**
- 25 **PLAN AND DEVELOPMENT REGULATIONS**
- 26 **JULY 14, 1998**
- 27 **State Agencies**
- 28 No comments received.
- 29 **Regional Agencies/Governments**
- 30 **Response to Swinomish Tribal**
- 31 **Community - Letter No. 1**
- 32 **Issue:** The Swinomish Tribe would like to
- 33 have four additional mitigation measures
- 34 added to Historic and Cultural Preservation
- 35 in Appendix 'C' of the SDEIS.
- 36 **Response:** Acknowledged. These items
- 37 have been added to the list of potential
- 38 mitigation measures in Appendix 'C'.
- 39 **Organizations**
- 40 **Response to Island County Citizens'**
- 41 **Growth Management Coalition - Letter**
- 42 **No. 2**
- 43 **Issue:** The Coalition has suggested several
- 44 wording changes to the SDEIS to reflect that
- 45 specific issues are still not resolved.
- 46 **Response:** Comments acknowledged.
- 47 **Individuals**
- 48 **Response to Bill Thorn - Letter No. 3**
- 49 **Issue:** The SDEIS on page 20 indicates 1
- 50 dwelling unit per 1 acre as the base density
- 51 in the Rural zone. Should this be 1 dwelling
- 52 per 5 acres?
- 53 **Response:** Acknowledged. This has been
- 54 corrected.
- 55 **Response to William R. Applegate -**
- 56 **Letter No. 4**
- 57 **Issue:** Mr. Applegate reiterates his
- 58 comments submitted during the review of
- 59 the SDEIS for the Phase A Team Draft Land
- 60 Use Element, i.e. that the changes made to
- 61 date warrant developing an entirely new
- 62 EIS.
- 63 **Response:** Comment acknowledged.
- 64 **Public Testimony**
- 65 **Response to Reece Causey - Public**
- 66 **Testimony No. 1**
- 67 **Issue:** Appendix 'C' contains several
- 68 mitigation measures that she thought had
- 69 been eliminated, such as the use of TDRs.
- 70 **Response:** Appendix 'C' of the SDEIS is
- 71 the list of potential mitigation measures
- 72 originally identified in the DEIS that could

1 be used to address unavoidable impacts
2 associated with accommodating increased
3 growth. It is not intended that the County
4 would utilize all of the measures nor does it
5 commit the County to the use of every item
6 listed.

7 Response to Bill Thorn - Public

8 Testimony No. 1

9 **Issue:** Page 20 of the SDEIS appears to
10 have an error, showing 1 dwelling unit per
11 acre as the base density for the Rural zoning
12 district. Should this be 1 d.u. per 5 acres?

13 **Response:** Refer to the response letter No.
14 3 above.

15

SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT

PHASE B TEAM DRAFT COMPREHENSIVE PLAN

JULY 14, 1998

1 INTRODUCTION

2 This current document represents the third part of a phased environmental review of the draft
3 Island County Comprehensive Plan. It has been prepared under the authority of the State
4 Environmental Policy Act (SEPA) RCW 43.21C and the procedural requirements of WAC 173-
5 11-600(4)(d) and WAC 173-11-620. This Supplemental DEIS is not intended to include analysis
6 of actions, alternatives or information that was addressed in the original DEIS or the first
7 Supplemental DEIS.

8 Previous environmental review has consisted of two parts. First, a Draft Environmental Impact
9 Statement (DEIS) was prepared as an integral part of the original draft of the Land Use Element
10 of the proposed Island County Comprehensive Plan. This is referred to as the Staff Draft and
11 was released in November, 1996. The purpose of the initial phase of environmental to compare
12 the potential environmental consequences and impacts of four alternatives for the Land Use
13 Element. From that effort a Preferred Alternative was chosen to form the framework of the rest
14 of the Comprehensive Plan. A complete text of the environmental review chapter of the Staff
15 Draft is provided in Appendix A attached to this document.

16 A Supplemental Draft Environmental Impact Statement (SDEIS) was prepared and released in
17 March, 1998 to review updates to the draft Land Use Element, referred to as the Team Draft.
18 The primary reasons for updating the draft Land Use Element was to address amendments to the
19 GMA that were adopted in 1997 and issues that were raised through the public review process.
20 The GMA amendments introduced a new land use classification, Rural Areas of More Intensive
21 Development, which are intended to recognize that some rural areas have experienced
22 development that is non-rural in density and character. A complete text of the SDEIS prepared
23 in relation to the Team Draft is provided in Appendix B attached to this document.

24 This current SDEIS completes the environmental review process by assessing the potential
25 environmental impacts (if any) of the rest of the plan elements that will make up the complete
26 Island County Comprehensive Plan. This assessment also includes the updates to various
27 development regulations that implement the Plan strategies and policies.

28 The plan elements reviewed include the following:

29 Natural Lands Element
30 Shoreline Element
31 Water Resources Element
32 Housing Element
33 Transportation Element
34 Capital Facilities Plan
35 Utilities Element
36 Parks and Recreation Element

37 Development regulations reviewed include:

38 Chapter 3.04 Public Benefit Rating System
39 Chapter 17.03 Zoning Ordinance
40 Chapter 17.04 Critical Areas Regulations

Chapter 17.05 Shoreline Use Regulations

Previous environmental review (see the appendices) focused on the Land Use Element, which establishes the future land use plan. The future land use plan is based on an analysis that recognizes the dispersed nature of both the historical development and natural features of the County. Historical development trends and land use regulations fostered a dispersed and fragmented land use pattern that mixed densities and locations. This has resulted in small pockets of non-rural development through out the County.

The basic concept of the Land Use Element and the Comprehensive Plan as a whole has been to encourage future growth and development to locate in those existing developed urban and dispersed rural areas in an effort to preserve the County's natural resources and amenities, critical areas, open spaces, and rural characteristics. The first phase of the environmental analysis concluded that this approach should result in less of a county-wide environmental impact than allowing the historical development trends to continue. A listing of unavoidable environmental impacts from increased growth and associated mitigation actions are found Appendix C.

The GMA requires that a comprehensive plan be internally consistent. This means that policies and actions proposed in each plan element must support or at least not conflict with those proposed in the other plan elements. In applying the procedural and information requirements of GMA the Land Use Element represents the core of the Comprehensive Plan, establishing the land use assumptions upon which the other plan elements are based. While each plan element deals with a specific aspect of planning for growth, they each must contain policies and proposed actions that further the growth management concept established in the Land Use Element.

From the standpoint of an environmental review of the other plan elements and development regulations the Land Use Element becomes the standard by which they are assessed. A Preferred Alternative was chosen for the Land Use Element based in part on the environmental review of four alternative land use strategies, one being a no-action alternative. The selected strategy carries with it a given level of associated environmental impacts and a set of potential mitigation actions to minimize those impacts. This establishes the environmental profile of the draft Land Use Element. If a policy or action in a plan element or a development regulation is consistent with the Land Use Element, then it should also fit the environmental profile. This approach also addresses mitigation measure #59.

The list of potential mitigation measures in Appendix C are compared with policies and actions proposed in the plan elements and development regulations. Where an element or regulation addresses a listed mitigation measure it is indicated by the corresponding number(s) on the list enclosed in brackets [].

COMPREHENSIVE PLAN ELEMENTS

In this section the other Comprehensive Plan elements are reviewed for consistency with the land use element. Each element of the plan has particular information and analysis requirements as stipulated under the GMA. Taken together these requirements are intended to be mutually supportive and interrelate the information and planned actions between the various elements. Much of this information has an environmental component and provides a reasonable means to assess the compatibility of these plan elements with the environmental profile of the land use

1 element. Where appropriate the information requirements of GMA are used here as a kind of
2 checklist for review.

3 **Land Use Element - Overview**

4 The Land Use Element has been included for the purpose of review and to provide some
5 additional information that was not available during previous SEPA review.

6 As mentioned above the basic concept of the Plan has been to encourage future growth and
7 development to locate in those existing developed urban and dispersed rural areas. How this
8 concept is applied in the different plan drafts has changed. In the Staff Draft released for review
9 in 1996 new growth was to be limited to existing urban areas, designated Rural Activity Centers
10 (RACs), and existing platted subdivisions, planned residential developments and planned
11 residential communities (collectively called PRCs). With few exceptions existing plats, which
12 are dispersed throughout the County, would have been available for development at the
13 prevailing lot density, conditional upon water and septage. In many cases existing plats could be
14 expanded into adjacent lands upon a demonstration of similar lot density and provision of water
15 and sewer service. This approach relied heavily on a transferable development rights system to
16 direct growth and preserve environmental features. It was intended to create a local market for
17 development rights based on the difference between environmental constraints on some lands
18 and allowing for greater density on others upon purchase of the rights.

19 The first phase of the environmental analysis a review of four alternatives (including a no action
20 alternative) concluded that the Staff Draft approach should result in less of a county-wide
21 environmental impact than allowing the historical development trends to continue. However, it
22 would have more of an impact than directing all growth either 1) to existing municipalities or 2)
23 to existing municipalities and a few designated rural growth areas. Neither of these two
alternatives appeared to be practical due to the physical limitations of the municipalities to
provide services and the concerns of County residents.

A Team Draft Land Use Element was released for review in early March. This draft of the plan
refined the overall growth concept by identifying 'rural areas of more intensive development', a
land use category introduced in the 1997 amendments to the Growth Management Act (GMA).
This was added to GMA to recognize that some rural areas have experienced development that is
non-rural in density and character and is particularly applicable to Island County given the
historical development pattern. This approach has two significant differences than that in the
previous Staff Draft. First, the number of individual areas identified as more intensive rural
development (70) are fewer than the number of PRCs identified in the Staff Draft (over 100).
Second, the established boundaries of these areas are not expandable, meaning that the prevailing
lot densities would not extend into adjacent lands.

The Team Draft also has used a higher population estimate through the year 2020 than the Staff
Draft (118,800 versus 101,300). This was done to recognize that recent new growth has been
occurring faster than originally estimated in the Staff Draft. The environmental result is that
while more people are being planned for, the intended locations for new growth are fewer and

more concentrated than proposed in the Staff Draft. So while the Team Draft meets the general environmental profile established in the first phase of environmental review, the environmental effects are intended to be more localized and, therefore, should effect less of the County's area.

During the last several months County staff have performed an estimate of the net number of potential buildable parcels in the proposed Residential and Rural Residential land use designations. This analysis is summarized in Table 1 in Technical Appendix #3 of the comprehensive plan. The table demonstrates two points in particular. First, the number of parcels required to accommodate the estimated growth is 15,250. The net number of potentially buildable parcels is a range between 16,735 and 19,363, depending on how extensively density bonus incentives are used. This appears to demonstrate that there is a potential surplus of available lots in the two districts. A review of historical platting activity also shows that the rate at which parcelization has occurred has slowed significantly, presumably the result of market forces and the existing supply of lots. In the last fifteen years new plats have only accounted for just under 5% of the total number of lots in the County.

Second, note that 70% of smaller platted lots (those under 1.5 acres) are constrained by some development limitation. Many of these areas are located on the shorelines with important marine habitats, areas of known sea water intrusion, or areas with geological hazards. The Health Department has requested that a number of the areas originally designated Rural Residential be deleted. The Public Works Department has recommended more stringent development standards be established if these and other similarly constrained areas are allowed to develop further.

While the priority in the land use element has been to encourage new population to locate in the existing platted areas of more intensive residential rural development (i.e. the proposed Rural Residential designation), this strategy is constrained by environmental limitations on many of these sites. In other words a strict application of concentrating growth in the Rural Residential designation could lead to greater overall environmental impacts. This creates a trade-off: to avoid environmental impacts in some Rural Residential areas means that a portion of the population growth will be shifted to areas that have not yet experienced significant parcelization (i.e. lands in the Rural designation).

Recognizing these limitations the number of areas included in the Rural Residential designation has been reduced from 70, with 14,484 acres, down to 40, with 9,950 acres. The net acreage reduction is 4,534 acres.

As a result a greater reliance is being placed on developing land use regulations to mitigate on-site environmental impacts, as opposed to trying to concentrate virtually all rural County growth within the Rural Residential designation, which, as stated, may result in greater environmental impacts. Proposed regulations are discussed later in this review and have been developed as mitigation measures. Those ordinances and regulations that have a development standards component that is being updated relative to the comprehensive plan include the following:

- Zoning code - has been reorganized to reflect the land use designations, densities, rural development conditions, and locations identified within the proposed comprehensive plan.

- Shoreline Use Regulations - have been updated to recognize a significant amount of parcelized land is on the County's shorelines. Updates include such things as greater shoreline setbacks, restrictions on shoreline protective facilities, and tighter linkages to regulations controlling development in environmentally sensitive areas.
- Critical Areas Regulations - have been updated, in particular to include the identification and tighter regulations for Fish and Wildlife Conservation Areas.
- Site Plan Review - has been updated to include a greater number of land uses that require a site plan review; more detailed and specific standards established; and design review guidelines proposed.
- Land Clearing and Grading - includes more specific standards and procedural requirements for site preparation and alteration, particularly in proximity to sensitive areas.
- Stormwater and Surface Water Ordinance - establishes specific on-site drainage requirements and standards.
- Density Bonuses - are established for planned residential developments. An Earned Development Unit (EDU) system is established to allow on-site and limited off-site density incentive to preserve productive agriculture and forest lands.
- Public Benefit Rating System - provides a tax incentive for property owners to set aside resource lands, critical areas, open space, view sheds, and other lands that contribute to the rural character of the County (see Natural Lands).
- Planned Residential Development Ordinance - Density bonuses have been reduced; size of clusters limited; and spacing restrictions between clusters have been established.
- Concurrency Management Ordinance

The majority of these updates are currently under review and are scheduled for adoption during July and August.

Finally, approximately 500 acres of previously zoned, undeveloped Non-Residential lands have been removed from non-residential land use designations. New commercial/light manufacturing uses are being directed to areas already characterized by these types of land uses. The intent is to concentrate employment opportunities in a few areas rather than the more dispersed pattern that is currently zoned. The allowed development intensity for these use areas would be greater than what is currently available, with the purpose of providing more jobs within the County.

Natural Lands Element

Island County has chosen to develop a Natural Lands element to its comprehensive plan as a result of the strong interest in this issue expressed by county residents. The protection or conservation of natural lands is perceived as having significant economic, as well as important environmental and aesthetic benefits. The vision expressed by residents indicates that natural lands promote a highly desirable rural character and quality of life, which is important now and

1 for future generations. Natural lands are defined in this plan in a manner which closely parallels
2 the definition of open space found in state statute.

3 Natural lands include any land area whose preservation in its natural or existing state would
4 conserve or enhance natural, scenic or cultural resources; protect surface waters or groundwater
5 supplies; promote the conservation of soils, wetlands, beaches or tidal marshes; enhance the
6 value to the public of abutting or neighboring parks, forests, wildlife preserves, nature
7 reservations or other open spaces; enhance recreation opportunities; preserve historic sites;
8 preserve working agricultural landscapes; or preserve visual quality or scenic vistas along
9 transportation corridors.

10 Examples of natural lands may include, but are not limited to forests and watersheds, agricultural
11 lands, wetlands, significant wildlife habitats (including corridors important for wildlife
12 movement or migration), complex shoreline systems (including lagoons, saltwater tidal flats,
13 marshes and accretion beaches), and conservation areas or reserves which have the capacity to
14 support complex biological communities or ecosystems.

15 Data obtained from the County Assessor's office indicates that parcels comprising nearly 71% of
16 Island County's land area contain some form of development, with the parcels comprising the
17 remaining 29% (38,630 acres) left in some form of open space. Approximately 75% of the
18 38,630 acres in open space is in "temporary" status. This includes lands owned by the
19 Department of Natural Resources and forest/agriculture properties in an open-space tax
20 deferment program. This means that, except for critical areas such as wetlands, deep water
21 habitats, tributary streams and their buffers, shorelines, habitat for protected species, and
22 resource lands of long-term commercial significance, between 50% and 75% of lands in "open
23 space" have the potential to be developed in the future. Roughly 10% of the County's land area
represents publicly owned State and County parks and scenic easements (such as Ebey's
Landing) that is "protected" from future development. Note also that these calculations do not
take into account open space areas in planned residential developments and in the incorporated
areas.

Goals and policies are included in this element. They have been identified through the public
process and developed to be consistent with Land Use Element policies for conservation of
natural lands resources. This element also includes an inventory of natural lands owned by
public agencies or governments. This includes federal, state, and locally owned lands. Other
elements of the comprehensive plan establish levels of service (LOS) to quantify the goals of a
jurisdiction in meeting the needs or desires of its citizens. In the case of an open space or natural
lands plan, the widely divergent types of lands, land features and community values make LOS
standards difficult to quantify, and even more difficult to compare across jurisdictions.
Therefore, this plan does not attempt to measure or establish Level of Service standards in any
natural lands category, or in any area of Island County.

A particularly important part of this element is the identification of a listing of Candidate Sites
for Conservation and Protection in the Analysis section. The methodology used to identify these
potential sites included analysis of survey responses as well as information gained from contacts
with local, state and federal agencies and interest groups with knowledge of the biology,
geology, geography and history of the county. The identification of a site here is not necessarily

1 an indication of the County's interest in acquiring any individual property. Some of the
2 suggested sites are specific in their location, while other suggestions relate to general areas of
3 land with a specific quality or value. In all over 100 sites or categories of lands are identified.
Implementation strategies are discussed at the end of the element and include tax exempt
programs, purchase/donation of easement rights, transfer of rights, and out right acquisition. [80]

4 The Natural Lands Element functions as a complement to the Land Use Element. Where the
5 Land Use Element identifies the location and intensity of development the Natural Lands
Element identifies the location and types of lands that are to be preserved.

6 **Shoreline Element**

7 The Shoreline Management Master Program (SMMP) has been updated to conform with the
8 shoreline development conditions proposed in the land use element. The SMMP becomes a
Comprehensive Plan element as required under GMA. The Shoreline Element is composed of
two basic parts: SMMP Goals & Policies and supporting development regulations, which are
discussed later in this document.

9 The SMMP Goals and Policies have been prepared in accordance with the requirements of the
10 State Shoreline Management Act (SMA), including recent legislative amendments. Chapter I
contains goals and policies for the eight required SMMP elements including economic
development, public access, circulation, recreation, shoreline use, conservation,
11 historical/cultural, and implementation. These policies set the framework for other more specific
use policies later in the SMMP.

12 Chapter II classifies the County's shorelines into different types of environments in order to
13 recognize that the shorelines are not uniform and vary as to biophysical limitations and past
development activity. As stated in the SMA, the environment designation given to any specific
14 section of shoreline should be based on the 1) existing development pattern; 2) the biophysical
capabilities and limitations of the shoreline being considered for development; and 3) the goals
and priorities of the County residents.

15 The SMMP previously identified four shoreline environment designations: Natural,
16 Conservancy, Rural, and Urban. The purpose, definition, designation criteria, and development
policies were and are in conformance with the SMA and consistent with the policy structure of
17 the overall Comprehensive Plan.

18 Two environment designations have been added to Chapter II. First is a Shoreline Residential
Environment designation. A Residential Environment is one that has been modified from its
natural state by residential unit construction. It identifies those areas which are currently
19 developed and/or has potential for residential development at a density greater than that
identified in the Rural Environment designation. Designation criteria include having a density
20 greater than that in the Rural and lots that have a minimum 60 feet of shoreline frontage, areas
that are capable of supporting the physical modifications to accommodate residences, areas that
21 are legally subdivided for residential use, consistency with locations in plans for other public
agencies, and reasonable availability of utilities. Development policies include conformance
22 with architectural controls, encouraging cluster development, erosion control measures and

preservation of shoreline vegetation, and use of environment protective covenants on individual lots.

The other addition is the Aquatic Environment designation. The Aquatic Environment is the water surface together with the underlying lands and the water column of all marine waters, all lakes, and all streams; including but not limited to bays, straits, harbors, waterways, tidelands, beds, and shorelands seaward of the ordinary high water mark, and associated wetlands. A subclassification, Aquatic-Conservation Environment, is an area which has been identified as a critical biological area with exceptionally high ecological value or shellfish and/or fish life and which contains a habitat or species considered highly sensitive to disturbance. There are thirty-two Environment Management Policies all designed to provide specific direction as to how development within these two aquatic designations will be allowed.

The addition of the Residential and Aquatic Environments is intended to provide a shoreline environment classification system that is more specific to the issues of residential development and preservation of aquatic resources. The other four environment designations did not adequately address these issues or provide specific policy guidance. The inclusion of these designations and the associated development/management policies should provide greater control over and mitigation of impacts from continued shoreline development.

Chapter III provides general policy statements/guidance for a variety of shoreline uses and activities. These are also a requirement under the SMA. Policies for agricultural, aquaculture, and forest management are particularly extensive and are aimed at reducing conflicts between ongoing resource production and shoreline protection.

Chapter IV reiterates the management principals and development guidelines for shorelines of statewide significance as required under the SMA. Appendices 'A' and 'B' locate the Aquaculture Districts and the Shorelines of Statewide Significance.

Water Resources Element

A Water Resources Element has been prepared to address the County's water resources in the context of increased population growth. The Water Resources Element is based largely on two previous water planning efforts: the 1990 Coordinated Water System Plan and the 1992 Groundwater Management Program.

COORDINATED WATER SYSTEM PLAN [32, 35]

A Coordinated Water System Plan (CWSP) was completed in 1990, addressing water quantity/quality problems. This plan includes several management options to be implemented by the county's public water systems. The major elements of the plan include a Utility Service Review Procedure, Conservation and Minimum Design Standards. Highlights of these requirements are outlined below:

Utility Service Review Procedure [31, 32]

- Prior to new water system development, the applicant must attempt to obtain water service from neighboring purveyors.

- New and expanding systems must prepare a water plan that evaluates the existing system, needed improvements and future needs.

Conservation [33]

Water conservation requirements for new water systems include:

- Installation of meters at individual connections and the well source.
- Implementation of rate structures that encourage water conservation.
- Development of a leak detection and repair program.
- Development of water use restriction procedures for drought periods.

Design Standards [33, 35]

Minimum design standards for water systems were adopted in ICC 13.03 and include the following resource management requirements:

- Metering at the well head.
- Metering individual connections.
- Water level device installed in the well for water level measurements.

Due to its rural nature and historical development patterns, Island County's many small, scattered developments frustrate the CWSP's goals to encourage the formation or expansion of fewer but larger, well-managed systems (rather than establish small, poorly staffed and ill or unmanaged systems). The Water Resources Element concludes that implementation of the growth strategy of the Land Use Element should assist in coordinating management of water systems.

GROUNDWATER MANAGEMENT PROGRAM [7, 35]

In 1992, the Ground Water Management Program (GWMP) was completed, pursuant to RCW 90.44, and adopted as part of the Island County Comprehensive Plan. Major elements being implemented by the Island County Health Department since the plan's adoption include the following:

Conservation Program: [27]

Pursuant to ICC 13.03 and ICC 8.09, all new potable wells drilled in the county are required to be metered whether they are public water supplies or single family individual wells. For individual wells serving one single family residence, verification of metering is required prior to approval of a Water Verification Form. For public systems, both source and individual connection meters are required. Use-based rate structures and conservation practices are implemented through the approval of the required water system operation and maintenance agreements.

Ground Water Monitoring and Evaluation: [27]

Well Inventory – 100% of well logs for wells with available data on file with the Island County Health Department and Department of Ecology have been entered into the hydrogeologic database.

Water Level Monitoring – Water systems in high and medium risk areas require water level monitoring in April and August of each year and the results are sent to the Island County Health Department and/or Department of Ecology. Water levels are monitored biannually during water sample collection of the 60 + wells in the monitoring network managed by the County Hydrogeologist.

Water Quality Monitoring – The current well monitoring program managed by the County Hydrogeologist includes the 40 wells and variable area specific monitoring of up to 60 wells. Routine water quality sampling is required by public water systems. Single family individual wells are required to monitor for water quality prior to approval for building permits per ICC 8.09.

Ground Water-Availability Requirement: [31]

ICC 8.09 was adopted in September 1990. The provisions of this code constitute minimum requirements of the Island County Health Department governing potable water source and supply and protection of groundwater resources.

Ground Water Recharge Measures: [35]

Critical Recharge Area Protection was incorporated into ICC 8.09 in 1992. All projects with the potential for groundwater contamination shall be evaluated by the Island County Health Department to determine their impacts on the groundwater resource. A Groundwater Recharge Study was initiated in February 1997 through a cooperative agreement and funding of the Board of Island County Commissioners and the U.S. Geological Survey.

Pollution Source Controls: [31]

ICC 8.09.097, Critical Recharge Area Protection, establishes a method by which land use proposals are reviewed to determine the potential for groundwater contamination. The Island County Health Department has developed a list of accepted Best Management Practice's which are both disseminated to the public and applied as "conditions of approval" on land use approvals. The Island County Health Officer has the discretion to impose conditions designed to prevent degradation of groundwater quality or quantity. ICC 8.09 complies with GMA requirements for verification of water availability and adequacy requirements for building permits and subdivisions.

Goals and policies are provided at the end of the Water Resources Element. Goals and policies fall into three broad categories: Aquifer Recharge Areas, Water Facilities, and Managing Existing Water Resources. These have been reviewed against the Land Use Element policies and appear to be consistent with the intent to monitor, conserve, and protect County water resources. [35]

Missing from this element is a comprehensive inventory of water resources and facilities and an assessment as to whether the County's potable water supply is adequate to accommodate the

growth planned for in the Land Use Element. A water supply assessment is admittedly difficult since the County's hydro-geology is non-continuous and fragmented. To address this the County hired a Hydrogeologist and data entry person in January of 1996. The Hydrogeologist works in the Health Department and current activities include:

- Detailed data collection, analysis, and mapping of aquifer distribution, aquifer parameters and geochemistry. Construction and calibration of three dimensional groundwater flow/ seawater intrusion models.
- Groundwater monitoring including a county-wide network of 40 wells including water sampling and water level monitoring. Up to 60 additional wells are monitored in area specific studies.
- Review of projects which may impact groundwater resources per ICC 8.09.
- Data management and development of database.
- Public outreach.

The County Hydrogeologist will be modeling the County's probable water supply and providing an assessment of the supply some time during the next two years. Since water supply is critical to accommodating growth, the County will need to review its land use assumptions and strategies relative to the findings in that report.

Housing Element [68]

Housing is a required element under GMA. The analysis contained in this element is based on the population projections and land use assumptions in the Land Use Element.

This element performs a housing needs analysis that is aimed at the issue of affordability.

Housing is considered affordable if housing costs represent 30% or less of a household's income. Analysis is based on population characteristics and demographic trends, comparison of housing costs relative to household incomes, trends in housing construction, and a forecast of the number of low and moderate income households through the year 2020. Discussions include elderly and special needs housing demand.

An inventory of land potentially available for housing is included. It identifies that there are 16,646 to 19,279 lots potentially available in the Residential and Rural Residential land use designations. Demand for buildable residential lots, including a 25% market factor, is estimated at 15,250, assuming 2.5 persons per residence. There appears to be more lots potentially available than needed to meet overall housing demand.

In meeting the projected housing needs reliance has been placed on the use of density bonuses. An Earned Development Unit program allows for higher density in exchange for protection of a variety of identified natural lands. PRDs are also given a standard 100% density bonus and a 200% bonus in an Urban Transition Overlay zone within the Rural lands designation. Higher density contributes to lower housing cost, but by itself is a limited tool. Policies provided at the end of the element have been reviewed and are consistent with the intent of the Land Use Element. Through this element the County is committed to developing a monitoring program to track its performance relative to housing goals and policies.

The element does point out that at the densities contemplated in the Land Use Element, half of those households with incomes of 50% to 80% of the County median and none below 50% will be able to afford housing in the unincorporated areas of the county. It is important to note that the proposed densities are the result of the priority to preserve the rural character of the County, and that densities that would result in more affordable housing in the rural county are incompatible with that rural character. The result is that affordability in rural housing is not fully mitigated within the Comprehensive Plan.

The element suggests that the County will continue to explore ways to address housing affordability for those below median income.

Transportation Element

The Transportation Element is one of the plan components required by GMA.

This element establishes the transportation goals and policies in Section II, pages II-1 through II-16. They are intended to ensure orderly development of transportation infrastructure that supports the land use assumptions set out in the Land Use Element. The transportation element develops an extensive and specific set of goals and policies based on the transportation and land use goals articulated in the land use element and are consistent with their intent. Policies are grouped into five main categories:

- Transit: providing policies for the provisions of public transportation.
- Nonmotorized transportation: establishes policies for coordinated planning of pedestrian and bicycle ways with other transportation facilities and land uses.
- Roads: policy direction for functional classification, roadway/arterial standards, and design.
- Other motorized transportation: provides general policies for airports and ferries.
- Implementation strategies and actions: includes such things as agency coordination, multimodal coordination, coordination with utility rights-of-way, compatibility with adjacent land uses, environmental protection, impact mitigation, improvement and expenditure priorities, maintenance standards, and special needs transportation.

Section III sets out the growth projections on which the transportation element has been based. They reiterate the population and employment projections found in the land use element and include the entire planning period through the year 2020.

An inventory of existing transportation conditions and facilities is provided in Section V Existing Conditions. This section details the current locations, types, level of use, and issues for all transportation modes including truck and automobile, airports, ferries, public transit, pedestrian, bicycle, and equestrian.

Level of service (LOS) standards are established in Section IV. LOS standards are required under GMA for roads and highways. LOS standards are provided for highways/roadways, intersections, transit service, and marine transportation (ferries). The LOS is based on accepted industry standards including the threshold traffic volumes that are associated with a defined LOS.

[95]

Section VI Future Conditions summarizes the impact on county roads, intersections, transit service, and ferry service as the result of new growth. Impacts are measured in terms of the increase in traffic volumes and the effect they have on the level of service. Table VI-1 shows traffic volumes and levels of service for all major county roads for the years 1996, 2003, and 2020. Table VI-2 provides the same information for selected segments of the State Routes. Table VI-3 compares level of service for selected intersections and includes notes as to when some will be signalized. The tables illustrate that there will generally be a drop in county-wide levels of service, but that the drop will not be felt uniformly. Some areas of the county will experience greater reductions in levels of service than others and some will experience no change.

State routes account for approximately 54 miles of roadways in the County. They provide the primary means for accessing the islands and function as major through routes. By 2003, there are expected to be four state highway sections that will not meet established LOS standards. They are:

- SR 20 from Deception Pass to Troxell Road (LOS 'E') (note: LOS 'E' is second to last)
- SR 20 from Troxell Road to Frostad Road (LOS 'E')
- SR 20 from Frosted Road to North Oak Harbor City Limits (LOS 'E')
- SR 532 from East Camano Drive to County line (LOS 'E')

By 2020, the above state highway sections will drop to an LOS of 'F' and the following sections are expected to drop to an LOS of 'E':

- SR 20 from South Oak Harbor City limits to Troxell Road
- SR 20 from Libbey Road to Main Street (Coupeville)
- SR 525 from Bush Point Road to Main Street (Freeland)
- SR 525 from Main Street (Freeland) to Bayview Road
- SR 525 from Bayview Road to Cultus Bay Road/Langle Road

While not included in the analysis, State Department of Transportation staff have indicated that the impacts to the level of service for these sections of highway are independent of the population growth forecasts used by the County. In particular, the identified impacts (i.e. drop in LOS) would occur whether the population forecast from the Staff Draft (101,300) were used or the Team Draft (118,800) were used.

Relative to on/off island traffic volumes, the land use concept is intended to mitigate additional traffic impacts on State routes. The idea being that by providing for more concentration of employment opportunities on the islands, coupled with a greater concentration of housing in proximity to employment, there would be less need for additional commuting trips on and off the islands.

Proposed improvements are addressed in Section VII. Several tables summarize the improvements to selected facilities needed to maintain the established LOS standards. Table VII-1 shows year 2003 improvements and estimated cost for State Routes. Table VII-2 provides the same information for the year 2020. Table VII-3 provides year 2020 improvements and costs for County roads. Table VII-5 gives similar information for intersections. [96]

Transit improvements are also addressed. Information includes areas identified for increased service, commuter service improvements, paratransit service, and supporting programs. Marine and air transportation improvements are also recommended. A fairly extensive list of nonmotorized transportation improvements are suggested including multi-use trails, bicycle routes and facilities, pedestrian trails and access, and equestrian facilities.

A financial analysis is provided in Section VIII. This section identifies funding sources and forecasts the revenue available for transportation improvements through the year 2020. Roadway project costs and revenues are summarized in Table VIII-1 through Table VIII-8. This information is separated into State highways and County roads since the State is responsible for its own improvements and maintenance. The information shows that through the year 2020 the County is expected to have \$490,911,000 of revenue and \$487,213,000 of roadway improvement expenditures, leaving a surplus of approximately \$3,924,000. [100]

Travel demand management is discussed in Section IX. Travel demand management strategies are not required for the County under GMA though certain strategies could improve travel. This section briefly talks about programs promoting park-and-ride lots, ridesharing, non-motorized transportation, transit, and high occupancy vehicle lanes.

This element does not contain a discussion of how transportation planning is coordinated between different governments and agencies. Policy 5.2 establishes intergovernmental coordination as a goal, but there does not appear to be any specific action or plan as to how this will be done. This is important in terms of establishing mutually supporting levels of service and coordinating the timing of improvements, in particular between the State and the County. There is also no discussion of ways to keep track of actual use of transportation facilities over time to ensure that planned capacity improvements will continue to be sufficient.

Capital Facilities Element [103, 108, 109, 112, 117, 124, 125, 130, 131, 132, 133]

Capital Facilities is another required plan element under GMA. The Objectives, Principals, and Standards section establishes the definition of facilities, LOS standards, and the policy framework of the element. LOS standards are established under 'Public Facility Needs' for arterial roads and transit routes, domestic water, community parks, sanitary sewer and septage handling, schools, solid waste, surface and storm water management, and county buildings. The policies also address priorities and responsibilities for funding, concurrency management, implementation programs, and coordination and consistency with other plans.

An assessment of capital facilities needs is provided within the 'Capital Improvement Program' (CIP) chapter of this element. Capital facilities addressed in the CIP are as follows:

Detention and Correction Facilities - Current capacity at the island County Detentions/Corrections Center is 58 beds. A deficit in accommodations is projected for the year 2020. The CIP proposes a jail expansion to accommodate 16 additional beds.

County Government Buildings: - This analysis includes general administration, courts, sheriff's department. Several capacity projects are proposed to increase square footage in these types of facilities in accordance with the established level of service.

1 Parks and Recreation - The LOS for parks is based on the number of acres per 1,000
2 population. Analysis shows an initial minor deficit in acreage of Community Parks.
3 Acquisitions are proposed through the year 2000 that result in a net surplus compared to
4 the projected population through the year 2020. Implementation of trail development is
5 also proposed within the CIP.

6 Roads - Analysis of facilities and proposed capacity improvements are dealt with in greater
7 detail within the Transportation Element. This summary includes suggestions for non-
8 capital alternatives for achieving the established levels of service.

9 Septage Treatment - The County operates one septage treatment facility located in
10 Coupeville. It is projected that by the year 2020 this facility will need to accommodate
11 29,600 septic systems, including Camano Island. In its current configuration and batch
12 operating mode this would mean a deficit of 8.8 gallons per residential equivalent per
13 year by the year 2018. Shifting to a continuous processing mode and/or installing an
14 additional digester would address this deficit.

15 Solid Waste - The majority of the County's solid waste is received at the Coupeville
16 Transfer Station. Waste received at two outlying transfer stations is transported to the
17 Coupeville facility for final processing. Recycling occurs at all facilities. The County
18 also provides for the handling of household hazardous wastes. It appears from Table A
19 that there is the capacity to handle future growth. However, this is not made explicit
20 within the analysis.

21 Surface Water Management - Storm water facilities are diverse and include a combination
22 of natural and man-made conveyance systems operated by both public and private
23 entities. Private and public systems must meet the development standards contained in
ICC 11.01 Land Development Standards. In addition, the County is preparing
Comprehensive Storm Water and Flood Hazard Management Plan. The County has also
prepared a Storm Water Improvement Program that identifies project schedules and
funding. Storm water facility projects are also included in certain transportation projects.

A Six-Year Capital Improvement Program is discussed and presented in Table 1 through Table
10. It lists all the capital projects scheduled through the year 2004 and identifies the costs and
associated funding sources. The Six-Year CIP is required in the Capital Facilities Element under
GMA.

Appendix A provides an inventory and summary of non-County capital facilities and services.

Appendix B identifies an extensive list of possible funding sources for the various categories of
capital facilities.

The Capital Facilities Element has been prepared consistent with the land use and growth
assumptions established in the Land Use Element. Estimates of capital improvement needs have
been based on the land use population projections in terms of both numbers and locations.

Missing from the analysis is a preliminary schedule of capital improvements beyond the year
2004. This information would be a useful guide in the annual updating of the Six-Year Capital
Improvement Program.

1 The primary environmental impact associated with this element would be the site specific
2 disturbances associated with construction of new facilities and facility upgrades. Adherence to
the County's site development and environmental regulations should mitigate those impacts.

3 **Utilities Element**

4 A utilities element is also a required comprehensive plan component under GMA. The utilities
5 covered in this element include natural gas, electricity, and telecommunications. All of the
6 providers of these services are private enterprises that are regulated by the Washington Utilities
and Transportation Commission (WUTC). Therefore, this element is not intended to establish
how, when, or where utilities facilities should be provided. The various utility providers do this
themselves based on demand for their services.

7 There are also no level of service (LOS) standards offered in this element since the providers are
8 required to provide service as demand occurs. With the exception of electricity the utility
providers have not prepared detailed forecasts or plans.

9 Goals and policies are provided in Section 2 of the element. Policies address such things as
10 coordinating utility line placement within various rights-of-way and trails, collocating utility
facilities on the same site, ensuring mitigation of maintenance activities on sensitive areas, and
coordination with the County's on-going planning efforts. These policies have been reviewed
with the land use element policies and appear to be consistent in their intent.

11 An inventory and analysis of utility facilities is provided in Section 4. It includes maps of
12 locations of existing and future facilities. It identifies the number of people that will need to be
13 served based on growth projections in the Land Use Element. New facilities are proposed to
meet the expected demand for service. Each utility provider has indicated they would be able to
serve the expected population and employment growth within their service boundaries.

14 Possible environmental impacts would come primarily from installation of new transmission
15 lines and maintenance of facilities that are currently located within sensitive areas. If the policies
outlined in this element are implemented, these potential impacts should be significantly reduced
or eliminated.

16 Funding for additional utility facilities and maintenance is the responsibility of each service
17 provider. No County funds would be required.

18 **Parks and Recreation Element**

19 Parks and Recreation is an optional element under GMA and has been include to identify the
recreation opportunities and facilities available in the County. This element should be read in
conjunction with the Capital Facilities Element.

20 This element establishes a set of goals and policies that address several issues regarding the
21 provision of recreation opportunities. They include such things as on-going planning,
maintaining rural character, environmental stewardship, shoreline access, open space corridors
and greenbelts, agency coordination, and public involvement. A special issues section discusses
22 shoreline access, trails, public lands, facilities design, and recreation programming.

1 The bulk of this element consists of an extensive inventory of existing park and recreation
2 facilities. This includes facilities owned and operated by the National Parks Service, various
3 State agencies, local facilities operated by the County and municipal governments and special
4 districts, and private facilities such as golf courses and marinas.

5 A Level of Service (LOS) is established for county parks and trails. They have been changed
6 from a current LOS of 2.9 acres per 1,000 people to 3.5 acres per for 1,000 people for county
7 parks, and a trail LOS of .14 miles per 1,000 people for trails. Note that there has previously
8 been no LOS established for trail development.

9 A public survey regarding park and recreation priorities was conducted earlier in 1998. The
10 results are summarized and acquisition/development priorities established based on the survey
11 results.

12 The final section briefly discusses issues of implementation, although no specific implementation
13 strategies are proposed.

14 **DEVELOPMENT REGULATIONS**

15 Various County development regulations and procedures are being updated to conform with the
16 proposed comprehensive plan. This effort has paralleled the development of the comprehensive
17 plan with the intent that the implementing ordinances would be adopted and in place along with
18 the adoption of the comprehensive plan. It is also intended that these ordinances mitigate the
19 potential on-site environmental impacts as part of the strategy to avoid sensitive areas within
20 designated Rural Residential lands.

21 Several ordinances have had separate review under SEPA and are being adopted incrementally so
22 they will also be in place at the time of plan adoption. Environmental checklists have been
23 prepared and a DNS issued for the following ordinances:

Chapter 11.02 Clearing and Grading Requirements - establishing grading/clearing permit
application procedures and minimum standards for forest practice permits, cuts and
excavations, fills and embankments, setbacks for cuts and fills, drainage and terracing,
erosion control, and reclamation of quarry or mining sites. [7, 9]

Chapter 11.03 Stormwater and Surface Water Ordinance - establishing the procedural
requirements for on-site drainage control for differing sized projects, drainage
requirements and review standards, requirements and responsibility for on-site drainage
facility maintenance, and enforcement of the drainage requirements. [24, 28]

Chapter 11.04 Concurrency and Adequacy Ordinance - establishing levels of service (LOS)
for public facilities, tests for concurrency and adequacy, and procedural requirements for
applying the LOS. [103, 108, 124, 125]

Chapter 16.06 Land Divisions and Dedications - establishes the application and review
procedures for boundary line adjustments and boundary line corrections, short
subdivisions, subdivisions (i.e. long plats), public dedications, and withdrawals and
vacations of plats. This chapter consolidates and replaces Chapters 16.01 Plats,

Subdivisions, and Dedications, 16.04 Short Plats and Short Subdivisions, and 16.04A Short Subdivisions and Boundary Line Adjustment Ordinance.

Chapter 16.13 Hearing Examiner - in conjunction with the amendments to Chapter 16.19.

Chapter 16.14C Environmental Policy - to comply with legislative updates to the State Environmental Policy Act as required as required in WAC 197-11. Amendments include raising the categorical exempt levels for SEPA review for accessory farm structures (10,000 to 30,000 square feet) and landfill/excavations (100 to 500 cubic yards).

Chapter 16.15 Site Plan Review - procedural amendments that add to and modify the list of land uses requiring a site plan review, adjust procedures to be consistent with Chapter 16.19 Land Use Review Process, and make appropriate reference to GMA requirements and the comprehensive plan.

Chapter 16.17 Planned Residential Development - procedural amendments that modify the applicability of the chapter to be consistent with proposed comprehensive plan land use designations and densities, removes references to subdivisions, and adjusts procedures to be consistent with Chapter 16.19 Land Use Review Process.

Chapter 16.19 Land Use Review Process - establishes permit application requirements and timelines to comply with legislative updates to the Growth Management Act for regulatory reform and permit process as required in RCW 36.70B.

Chapter 16.25 Agriculture and Forestry Protection - is intended to further the County policy to conserve, protect, enhance and encourage agriculture and forestry operations by exempting such practices from the definition of a nuisance under County code, removing the ability to pursue legal actions on such operations as public nuisances. [6, 48, 72]

Chapter 17.03 Island County Zoning Ordinance [59]

The Island County Zoning Code has been updated in conjunction with the development and review of the Comprehensive Plan. The code updates are intended to provide the specific regulatory provisions to implement the growth strategy established in the Land Use Element. The proposed zoning updates have been reviewed and compared with the policies and criteria for the land use designations in the Land Use Element and the mitigation actions listed in the DEIS (see Appendix C). The results of this review are summarized in the following sections.

ZONING DISTRICTS [60, 74, 75, 92, 93]

Eleven zoning districts are established in Chapter 17.03.050.A. There are also four zoning overlay classifications: wetlands, fish and wildlife habitat conservation areas, airport and aviation safety, and urban transition. These overlays apply additional use restrictions and standards, or modify the provisions of the underlying zoning district.

Subsection C provides for the preparation of zoning maps that depict the boundaries of the zoning districts. Draft zoning maps are being prepared in conformance with the boundaries for the land use designations shown on the future land use maps in the Land Use Element.

In particular, Chapter 17.03.070(D) establishes the designation criteria for properties in the Rural Residential (RR) Zone. This zoning district is important in that it is intended to correspond to those existing pockets of development that are more urban than rural in density and that serve as the priority receiving areas for future growth. Table A in Chapter 17.03.070(E) lists 40 residential areas of more intensive development that meet the zoning criteria. In earlier phases of planning 70 such areas were identified in the Team Draft. This has been reduced to 40 in the Planning Commission recommended land use plan after discussions with the County Health Department. The areas listed in the code are consistent with areas depicted on the land use maps in the Land Use Element.

The following table lists the land use designations established in the Land Use Element along with the corresponding use districts in the zoning code. Note that Business Park Lands are not included as a use district in the code since it has been determined that it would promote a use that is inconsistent with a rural environment and the intent of the growth management concept. The rest of the land use designations have a corresponding use district established in the zoning code.

<u>LAND USE ELEMENT DESIGNATION</u>	<u>ZONING CODE USE DISTRICT</u>
Rural Forest Lands (RF)	Chapter 17.03.110 Rural Forest (RF) Zone
Rural Agriculture Lands (RA)	Chapter 17.03.090 Rural Agriculture (RA) Zone
Resource Agriculture Lands (AG)	Chapter 17.03.100 Commercial Agriculture (CA) Zone
Rural Residential Lands (RR)	Chapter 17.03.060 Rural (R) Zone
Residential Lands (R)	Chapter 17.03.070 Rural Residential (RR) Zone
Village Commercial Lands (VC)	Chapter 17.03.130 Rural Village (RV) Zone
Commercial Center Lands (CC)	Chapter 17.03.120 Rural Center (RC) Zone
Rural Service Lands (RS)	Chapter 17.03.140 Rural Service (RS) Zone
Business Park Lands (BP)	none
Light Manufacturing Lands (LM)	Chapter 17.03.145 Light Manufacturing (LM) Zone
Airport Districts (AP)	Chapter 17.03.150 Airport (AP)
Special Review District (SR)	Chapter 17.03.160 Special Review District
Mineral Lands Overlay	Chapter 17.03.180.Q Land Use Standards - Surface Mining

Each zoning district has an associated purpose statement at the beginning of each of the district regulations (Chapters 17.03.060 through 17.03.160). These purposes statements have been modeled on the designation criteria and discussions found in the draft land use element and appear to be consistent with those land use designations.

ZONING DISTRICT DENSITIES [10, 30, 36, 43, 47, 49, 53, 64]

The zoning code allows for single family development in all R, RR, RA, CA, and RF districts. Base densities have been established in conformance with the land use designations in the Land

Use Element. 'Base density' is that which is allowed outright for the specific zoning district. Minimum lot sizes and base densities are outlined in the following table.

MINIMUM LOT AREA & MAXIMUM BASE DENSITY

LAND USE ELEMENT DESIGNATION		ZONING CODE USE DISTRICT	
RF	20 acre minimum lot size. 1 dwelling per 20 acres. Preference shall be given to PRD cluster development on parcels at least 20 acres in size in the event subdivision of land occurs	RF	20 acre minimum lot size. 1 dwelling per 20 acres. PRDs greater than 20 acres may average to base density. Use of Density Bonus System requires 75% open space. [90]
RA	20 acre minimum lot size. 1 dwelling per 20 acres. Preference shall be given to PRD cluster development on parcels at least 20 acres in size in the event subdivision of land occurs.	RA	20 acre minimum lot size. 1 dwelling per 20 acres. PRDs greater than 20 acres may average to base density. Use of Density Bonus System requires 75% open space. [90]
AG	40 acre minimum lot size 1 dwelling per 40 acres. Preference shall be given to PRD cluster development on parcels at least 40 acres in size in the event subdivision of land occurs	CA	40 acre minimum lot size. 1 dwelling per 40 acres. PRDs greater than 40 acres may average to base density. Use of Density Bonus System requires 75% open space. [90]
RR	5 acres minimum lot size. 1 dwelling unit per acre, with 50% increase in a PRD with 10+ acres; increase in Urban Transition Overlay according to policy.	R	5 acres minimum lot size. 1 dwelling unit per acre, with 100% increase in a PRD with 10+ acres and 200% in Urban Transition Overlay.
R	Base density is either 3, 2 or 1 dwelling units per acre as determined at the average existing parcel size of platted land within each area of more intensive rural. For those areas with an average parcel size less than 14,500 square feet, the minimum parcel size shall be 14,500 square feet or the minimum required by County health requirements, whichever is greater	RR	Lot size set in Table A 17.03.070. Density = average of existing designated plat in Table A.

1 The base density may be increased under certain circumstances. Chapter 17.030180.C provides
2 for a Density Bonus System for PRDs to encourage the use of clustered development (see
discussion on page 51).

3 Chapter 17.03.180.D provides for the use of Earned Development Units (EDU) on RF, RA, and
4 CA zoned lands. In these districts the property is allocated a percentage increase in the number
of allowed dwelling units based on the duration of the conservation easement (10, 20, 99 years or
in perpetuity). The intent is to provide an incentive to retain productive agriculture and forest
lands.

5 Earned Development Units may be used on those lots, tracts, or parcels that are included in an
6 approved Farm/Forest Management Plan, or on any property owned by the farm or forest
operator as of the date of an approved Management Plan. A Management Plan is intended to
7 establish the planned location for EDUs and the specific actions to be taken by the County to
strengthen or enhance the long term viability of the forest or farm unit. It should be noted that
8 the use of EDUs could be strengthened relative to the land use concept by designating specific
off-site locations within the county where the EDUs could contribute to areas of planned higher
9 densities.

10 ZONING DISTRICT LAND USES [49, 52, 60, 74]

11 Chapter 17.03.030 User Guide of the zoning code provides three summary charts of land uses,
Table A, Table B, and Table C. The tables list uses permitted in each of the proposed zoning
12 districts. Uses are permitted outright or require a Site Plan Review, Planned Residential Unit
approval, or Use Approval before development would be allowed. The requirement for these
conditional use approvals is intended to ensure that impacts from new development to
13 surrounding land uses and on-site/off-site environmentally sensitive areas is mitigated.

14 Each set of zoning district regulations starts with a list of permitted and conditional uses, with the
exception of Chapter 17.03.160 Special Review District. These are the same uses by zoning
15 district listed in Chapter 17.03.030. Some uses listed have limitations on size included in the
listing within the district regulation. These size limitations are also intended to minimize
development impacts.

16 Table A, B, and C in Chapter 17.03.030 and the uses listed in the zoning district regulations were
17 compared with the Land Use Element. Chapter IV Goals and Policies, Rural Element Land Use
Designations Policies and Resource Lands set out the types of uses envisioned for each of the
18 land use designations. The permitted and conditional uses listed in Chapters 17.03.060 through
17.03.150 appear to be consistent with the land use designation policies in the Land Use
19 Element.

20 OTHER ZONING PROVISIONS

21 Chapter 17.03.170 Urban Transition Overlay is a zoning district overlay that is intended to
22 correspond to R zoned land adjacent to designated municipal growth areas and potential non-
municipal urban growth areas. The Urban Transition Overlay is established to allow for the
future expansion of urban growth areas should they become needed to accommodate additional
23

1 population. Maximum lot size and a 200% density bonus is established to ensure future
2 development occurs at densities that allow for efficient provision of municipal services.

3 Chapter 17.03.180 Land Use Standards Sections A, B, F though K, M, and P through R contain
4 development standards in addition to the provisions in Chapters 17.03.060 through 17.03.160 for
5 specific uses. Minimum parcel sizes, performance standards, maximum building sizes,
6 limitations on activities and number of employees are some of the items addressed by these
7 sections. All are intended to mitigate the negative impacts of certain non-residential uses on
8 surrounding residential and resource lands. [76]

9 The remaining sections in this chapter deal with development incentives and general standards
10 applicable to several districts.

11 Section C. Density Bonus System: Provides a density bonus incentive for cluster
12 development in the Rural (R) zoning district. Base density may be increased up to 100%
13 with the use of a cluster development. In areas adjacent to municipal and non-municipal
14 growth areas, densities may be increased by up to 200% as provided in Chapter 17.03.170
15 Urban Transition Overlay. The standard density bonus may be increased for each dwelling
16 unit that is made available under an Affordability Covenant that is recorded with the County.
17 The Affordability bonus is based on the length of time the covenant (15 or 30 years) and the
18 income level targeted (30%, 50%, or 80% of County median income). [90]

19 Section D. Earned Development Units (EDU): Establishes a density incentive
20 program to preserve productive lands in the Rural Forest (RF), Rural Agriculture (RA), and
21 Commercial Agriculture (CA) zones. Density is tied to the length of time a parcel of land is
22 held for productive agriculture or forest use. The density can be applied on a portion of the
23 site held in production or on other land owned by the applicant. No less than 75% of the
farm or forest unit must be placed in the a conservation easement. A percentage increase is
provided based on the length of time the conservation easement is in effect: 10, 20, 99 years
or in perpetuity. To be eligible for the EDU program an applicant must prepare a
Management Plan for the resource land that is to be preserved. The EDU program is
voluntary. [6, 41, 89, 90]

Section E. Farm/Forest Management Plan: Sets out the management plan requirements
for the long term preservation of productive land and the use of EDUs discussed above. The
plan locates where the EDUs will be used, establishes protective easements, locates prime
soils, provides for County participation, and runs with the land. An applicant must agree to
maintaining at least 75% of the property in commercial production for at least 10 years in the
RA and RF zones, and 20 years in the CA zone. The intent of the Management Plan is to
help ensure that the most productive farm and forest land is conserved. [6, 41, 89, 90]

Section L. Non-Residential Design, Landscape Guidelines and Screening: Establishes the
general design guidelines for non-residential uses. This section has been added to mitigate
the visual impacts of development and help preserve the rural character of the County. Items
addressed include building appearance and scale, use of native vegetation, and landscaping
and screening to name a few. Different standards apply to R and RR zones than RC, RV, and
RS zones. [70, 76]

Section N. Signs and Lighting: A lighting provisions has been added, 17.03.180.N.5, that requires fixtures be designed and oriented to avoid glare onto adjacent properties. It also appears to require motion sensing devices to ensure lights go off when not in use, reducing light and glare and conserving energy. [69, 71]

Section O. Site Coverage and Setbacks: Establishes maximum impervious surfaces, minimum open space ratios, and maximum building coverage for selected uses and districts. In particular, development of a PRD requires 75% of the site be left in open space, which encourages clustering. Yard setbacks for the RC, RV, RS, and CA zones have been added.

Chapter 3.04 . Public Benefit Rating System [6, 41, 51, 80, 85]

A Public Benefit Rating System is being adopted to provide a reduced tax assessment incentive for the preservation of a range of resource lands, environmentally sensitive areas, and natural features. Lands and areas that are potentially eligible for the program are prioritized in three categories: High priority = 5 points, Medium priority = 3 points, and Low priority = 1 point. The list of eligible lands are as follows:

High Priority Open Space Resources:

Resource and Rural Agriculture Lands
Rural Forest Lands
Natural Shoreline Environments
Stream Corridors
Significant Fish and Wildlife Habitat
Conservation Areas and
Special Pant Sites
Historic Landmarks/Archeological Sites
Private Lands within National Preserves
Category 'A' Wetlands

Medium Priority Open Space Resources:

Conservancy Shoreline Environments
Flood Hazard Buffer Areas
Geologic Hazard Buffer Areas
Scenic Natural Resources Viewpoints
and View Corridors
Urban Growth Area Open Space
Public Lands Buffer
Category 'B' Wetlands

Low Priority Open Space Resources:

Privately Owned Trails and Corridors
Category 'C' Wetlands

These lands are defined in Section II - Definitions. Bonus points are available for providing public access, restoration, ownership of contiguous parcels, water quality buffers, and conservation easements held in perpetuity. A maximum of 57 points are possible under the rating system.

The tax assessment on a property is reduced based on the number of points it receives under the rating system. The resulting reduced tax obligation is then considered the property's 'current use' tax assessment.

PUBLIC BENEFIT RATING POINTS	CURRENT USE VALUE
0 – 4 points	100% of assessed value
5 – 10 points	50% of assessed value
11 – 15 points	40% of assessed value
16 – 20 points	30% of assessed value
21 – 34 points	20% of assessed value
35 – 57 points	10% of assessed value

The definitions in Section II also contain eligibility criteria. For several of the categories there are dimensional requirements, such as minimum area for agriculture lands and scenic resources or minimum widths for eligible buffer areas. Other eligibility criteria are tied to definitions or requirements in other regulations or programs, for example Category A wetlands are defined in the Critical Areas Regulations and historic landmarks must be on the county or other register of historic places for inclusion in this program. Using criteria and standards from other County regulations to establish eligibility under this program should assure consistent implementation of conservation measures.

The Public Benefit Rating System is an implementation strategy identified in the Natural Lands Element. State law permits counties to offer reductions in property taxes as an incentive in exchange for agreements to conserve or protect farm lands, forest lands, or open space. Many counties have adopted a *Public Benefit Rating System* (PBRs) as a more fine-tuned approach to property tax reductions for open space preservation. The advantage to tax benefit programs is that they do not require the appropriation of new funds by the county to protect unique or desirable natural lands. In addition, the PBRs approach permits the county to focus on the protection of identified priority areas.

Some view the 'tax shift' which occurs with these programs as a disadvantage. When a property is granted a tax reduction, the value of that reduction is spread among all other properties within the county. However, a review of similar programs in other counties suggests that the total tax loss to the County as a result of this program would be significantly less than 1% of the total assessed value of County lands. This is also a voluntary program.

Chapter 17.04 Critical Areas

Chapter 17.04 Establishes the general requirements and regulations for the protection of critical areas. It identifies the categories of critical areas to be regulated and which regulations apply. Critical areas regulations are interrelated with other County Code chapters that have provisions for potable water supply, on-site sewage systems, flood prevention, and general land development standards.

This chapter includes a listing of activities, uses, and critical areas that are exempt from the provisions of the critical areas regulations. These items include such things as existing agricultural activities, various maintenance activities, site investigation work, emergency actions,

flood control, irrigation, and certain water habitats. It also provides for reasonable use of properties constrained by critical areas.

OVERLAY ZONES:

A. Wetlands (w): The existing wetland regulations are currently being review under a Growth Board action. Once the case is settled SEPA review will need to be performed on any revisions. The intent of wetland regulations is to protect wetland functions such as habitat, run-off control, aquifer recharge, and open space. While the appeal is pending the County has adopted, on an interim basis, several specific wetlands amendments.

B. Steep/Unstable Slopes (s): Steep and unstable slopes are declared to be an environmentally sensitive area in this section. Regulations applicable to slopes are contained in Chapter 11.03 Erosion Control and Drainage Requirements. Sections 11.03.300 through 11.03.350 set construction and review criteria that are based on an assessment of peak flows and erosion potential.

C. Fish and Wildlife Conservation Areas (fw): Island County has completed an inventory of biologically critical areas (i.e. habitat). A new section has been added to the critical areas regulations that are aimed at preserving identified habitats. Subsection 1 designates a variety of habitat conservation areas including endangered species, streams, several marine habitats, State natural preserves and resource lands, and species of local importance.

Subsection 2 establishes the requirement for a Biological Site Assessment (BSA) for projects proposed on sites containing an identified habitat area. This assessment includes identifying appropriate on-site mitigation measures and the use of Best Management Practices in site development.

Subsection 3 establishes protection standards for streams. Stream classification is based on the Department of Natural Resources classification system. Protective buffer widths are based on the stream classification. Provisions also allow for modification of buffer widths based on certain criteria ensuring no degradation of identified habitat.

Subsection 4 requires on-site sewage systems for developments adjacent to commercial and recreational shellfish, kelp and eelgrass beds, and herring and smelt spawning areas.

The remaining sections establish protective measures for bald eagles and other nonspecified habitats based on State requirements.

Chapter 17.05 Shoreline Use Regulations

Chapter 17.05 is an updated set of shoreline regulations that replaces former Chapter 16.21. It has been formulated to address issues of shoreline development identified in the Land Use Element and the SMMP.

Sections 17.05.005 through 17.05.045 establish the purpose of the chapter, includes a more extensive list of development definitions, identifies the relationship to other development regulations, establishes permitted uses for the six shoreline environment designations, identifies activities exempt from shoreline permit/regulatory requirements, and outlines general shoreline use requirements.

1 Sections 17.05.050 through 17.05.130 establish specific development regulations for a selected
2 set of uses and shoreline activities. There are a total of seventeen sections each dealing with a
3 specific use category, all of which correspond directly with the general use policies provided in
4 Chapter III of the SMMP. There are several updates that are of particular note:

5 Section 17.05.065 Commercial Development - includes amendments that restrict the
6 location of commercial uses, particularly with regards to setbacks from the shoreline.
7 Commercial uses are expressly prohibited in Aquatic, Natural, and Conservancy
8 environments.

9 Section 17.05.070 Docks and Piers - amendments place greater restrictions on the
10 development of residential moorage structures. In particular individual piers are not
11 considered an outright permitted residential use. The applicant must demonstrate that
12 existing facilities are inadequate, other moorage methods or upland storage is not feasible,
13 and that a joint use arrangement is not feasible. Each pier proposal will be evaluated as to
14 cumulative impacts on the shoreline environment.

15 Section 17.05.100 Residential Development - has been extensively updated to comply with
16 other development regulations and policies that provide stricter control over shoreline
17 residential development. Highlights include the following:

- 18 - Residential development is not considered a water dependent use and shall not be
19 permitted seaward of the ordinary high water mark. Live aboard vessels and other
20 floating residences are restricted to approved marinas.
- 21 - Setbacks from the shoreline must be at least 50 feet, but greater setbacks will apply in
22 situations where other development regulations have control, such as in erosion control
23 near steep slopes and protection of fish and wildlife habitats.
- Provisions for protection of adjacent views in areas of previous development.
- Limitations on the location of accessory structures, i.e. in general, they may not be
further waterward of the primary residential structure or be located in the shoreline
setback.
- All structures are to be designed and located so as not to require the use of bulkheads or
other shore works.
- Subdivisions have several restrictions including allowing for sufficient lot depth on
feeder bluffs so bulkheads are not required, setbacks in conformance with the underlying
zoning, and location of septic drainfields away from bluffs and geologically hazardous
areas.
- Retention of natural vegetation on bluffs and steep slopes and allowing no more than
50% of the shoreline vegetation to be removed.
- Stairways and ramps are considered a normal residential appurtenance, but must comply
with several development restrictions including avoiding unstable slopes, not requiring
the use of bulkheads, minimize loss of vegetation, shall be the minimum necessary to
provide shoreline access and may not include a deck, and shall be located as far inland as
possible.

17.05.120 Shore Defense Works - has been amended and updated to comply with recent SMA legislative updates and to be consistent with the policy intent of mitigating any further development impacts to the shoreline environment. Some highlights include the following:

- Shore defense works are not considered an outright permitted use.
- Groins and jetties are only permitted as part of a community or public beach management program.
- Shore defense works are generally not allowed on marine feeder bluffs.
- Bulkheads related to residential development will only be permitted when a an existing residence is threatened, the proposed bulkhead is located landward of ordinary high water, or when there are existing bulkheads on both adjacent shoreline properties. Bulkheads will generally not be allowed on an undeveloped lot.

There are also Design Regulations established for the construction of protective bulkheads that address issues of appropriate materials, materials toxicity, minimum necessary protection, passage of groundwater, and incorporation of elements such as stairs. Regulations also include direction and provisions for Shoreline Restoration/Beach Enhancement, with specific restrictions for the Natural Environment designation.

17.05.130 Utilities - has been updated to include specific regulations for the development and use of individual desalination facilities for purposes of water supply, but will only be allowed when it is demonstrated that no other water source is feasible or available.

It is important to note that shoreline regulations have been updated largely in response to the fact that many of the areas designated Rural Residential occur on the County's shorelines. These updates are intended to provide mitigations as part the growth strategy set out in the overall Comprehensive Plan.

SUMMARY

The purpose of this SDEIS has been to review the rest of the comprehensive plan elements and updated development regulations relative to the Land Use Element in the context of mitigating the unavoidable environmental impacts identified in the first phase of SEPA review. Several major conclusions can be drawn from this review.

- 1) Based on additional analysis of the environmental constraints associated with many of the areas originally designated Rural Residential, a strict application of the concept of concentrating growth only within those areas would likely have greater environmental impacts than allowing some of the projected growth to be accommodated within the Rural designation. As a result, a greater reliance on regulations controlling site specific development is proposed to mitigate those impacts identified in the first phase of environmental review.
- 2) A number of new land control ordinances and updated existing regulations are proposed to address the impacts associated with proposed growth management approach. New regulations, such as Fish and Wildlife Conservation Areas and a Public Benefit Rating System, add regulatory tools not previously available to the County. Updates to existing

1 regulations, such as zoning and shoreline management, provide stricter controls on uses,
2 locations, and site development activities. In addition, density bonuses and tax incentives are
3 established to encourage retention and preservation of productive resource lands, critical
habitats, and other elements of the County's rural character. All of the proposed regulations
appear to be consistent with and implement the comprehensive plan.

- 4 3) The other plan elements have been reviewed for consistency with the proposed land use
5 element. They appear to be both consistent with each other and with the land use element. A
6 few specific informational deficiencies have been noted, but in themselves do not appear to
7 have any adverse environmental consequences. Optional elements, in particular Natural
Lands and Water, have been prepared with the specific intent of providing additional policies
and implementation measures to address rural character preservation and on-site development
impacts.

8 In general, the plan elements and development regulations discussed in this review appear to be
9 consistent with and support the overall growth management strategy presented in the land use
10 element. As a result they also address and mitigate a majority of the unavoidable environmental
11 impacts identified in the first phase of environmental review.

POTENTIAL MITIGATION MEASURES

POTENTIAL MITIGATION MEASURES

The following potential mitigation measures were identified in the DEIS issued in November 1996 as part of the review of the Staff Draft Land Use Element. It is an exhaustive list that identified all the mitigation measures that the County could utilize in mitigating those unavoidable environmental impacts identified in the DEIS. The list of mitigation measures are not prescriptive and do not commit the County to using every mitigation measure identified. County staff and consultants have used this list to guide the development of plan policies and land use regulations. It is acknowledged that some of the items on the list will not be used in implementing the Comprehensive Plan.

Earth

Unavoidable Impacts

New development in Island County will result in site specific grading, filling, excavation, removal of plants and trees, and other disturbances to the earth. Although these impacts cannot be eliminated, they can be mitigated through a sound comprehensive plan and well-designed mitigation measures.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

1. Direct urban development only to areas that are appropriate to development at urban densities, avoiding all designated geologic and soils hazards areas.
2. On slopes greater than 15%, maintain low residential densities.
3. In geologically hazardous areas prohibit all uses except those classified as low intensity uses, such as agriculture and recreation.
4. To preserve agrarian aspects of the rural lifestyle and maintain low intensity use, establish agricultural production as the highest priority use on identified prime agricultural soils.
5. On designated forest lands, establish silvaculture as the highest priority use.
6. Provide incentives and zoning designations, and apply other regulatory techniques to preserve prime agricultural soils for agrarian uses.
7. Adhere to guidelines established by the Washington State Department of Ecology for erosion and sediment control.
8. Require mandatory riparian, lacustrine, and steep slope vegetative buffers to limit erosion, siltation, and marine impacts during and after construction.

9. Establish permitting protocols that will examine projects in a cumulative manner and provide site specific mitigation to reduce impacts in the design phase, rather than try to mitigate problems after they have developed.

Air

Unavoidable Impacts

As growth occurs, there would be an increase in the source of air pollutants, potentially degrading air quality.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

10. Minimize trips lengths and reliance on private vehicle use by promoting a compact pattern of development in urban areas.
11. Prohibit land uses that create noxious or toxic air pollutants near residences, hospitals, or other incompatible land uses.
12. Increase awareness of the air quality impacts of vehicle emissions, wood stoves, and other activities through a public education program.
13. Require all new development, including those in rural areas, to have heating sources other than wood stoves.
14. Establish wood stove emission standards that exceed current state standards.
15. Establish outdoor burning bans in UGAs and RACs.
16. Island County could provide collection and recycling of land clearing debris from all sites where clearing and timber harvest occurs, thereby eliminating the need to burn unmerchantable timber and debris. On-site wood waste recycling options such as chipping machines could be provided.
17. Establish higher emission standards for new industrial and commercial uses that exceed state and federal standards.

Water - Surface Water, Runoff/Absorption, Floods, and Groundwater

Unavoidable Impacts

As urban development continues, some increases in impervious surfaces would be expected, potentially decreasing groundwater recharge, reducing surface water flows during dry periods, and increasing flooding problems.

As urban growth occurs, increases in pollutant sources associated with urban uses would occur, potentially contaminating surface waters and groundwater.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

18. Minimize water quality impacts in the UGAs, RACs and PRCs by encouraging a development pattern that minimizes impervious surface coverage, such as clustered development, multi-story buildings, or other innovative building designs.
19. Minimize water quality impacts in the rural areas by concentrating growth in the UGAs, RACs, and PRCs.
20. Provide for residential development patterns in the UGAs that will support a public sewer system.
21. Limit development activity in frequently flooded areas to low intensity uses, such as agriculture and recreation.
22. Require mandatory buffers of undisturbed vegetation for designated streams.
23. Provide for the transfer of development rights to allow development in appropriate locations, while protecting environmentally sensitive areas.
24. Encourage the retention of vegetation, wetlands, and the use of natural stormwater management facilities, such as bio-filtration swales.
25. Evaluate and enhance critical area regulations to reduce stormwater runoff, erosion, sedimentation, and flooding problems.
26. Increase standards for installation of new septic systems and for maintenance and inspection of existing septic systems.
27. Identify and establish procedures for increased protection of groundwater. Implement recommendations of the County Ground Water Management Program.
28. Develop and implement County-wide stormwater control plans.
29. Develop education programs to provide information on water resource protection and conservation.

Water - Public Water Systems

Unavoidable Impacts

Demand for potable water will increase as population grows.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

30. Promote a coordinated and connected water system by providing a compact and concentrated growth pattern in the UGAs, RACs, and PRCs.

31. Restrict new growth based on projected water availability.
32. Promote the use of coordinated and connected water systems and discourage development of small, independent water systems.
33. Require water conservation measures in new development.
34. Locate new wells inland, away from the coast and especially narrow points of land to reduce potential salt water intrusion.
35. The tools for coordinated water supply planning have been developed in the CWSP and GWMP. Implementation of the recommendations of these plans will promote good drinking water supply planning.

Plants and Animals

Unavoidable Impacts

Some habitat loss will occur with new development.

Mitigation Measures

The following are potential mitigation measures the Comprehensive Plan and future regulatory efforts could implement:

36. Reduce development pressure and associated habitat loss by concentrating growth in a limited number of areas. Preserve riparian corridors and wetlands by cluster development that would minimize intrusion into significant habitat areas.
37. Provide for a County-wide open space network that preserves habitat areas and movement corridors for wildlife.
38. Establish low density land use designations in significant fish and wildlife habitat areas.
39. Develop standards that emphasize the preservation of natural vegetation, including widened buffer requirements and standards for the minimum removal and disturbance of vegetation.
40. Evaluate and revise critical areas regulations to enhance protection of habitat areas.
41. Establish a land acquisition program for especially significant habitat areas.
42. Develop a comprehensive habitat management program to protect natural resources in Island County.

Energy And Natural Resources - Rate of Use, Sources/Availability, Nonrenewable Resources, Conservation, and Renewable Resources

Unavoidable Impacts

Demand for power and natural resources will grow with increased residential, commercial and industrial development.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

43. Promote energy conservation by providing a concentrated growth pattern that would permit energy efficient housing design.
44. Establish and designate commercially significant natural resource lands for long-term protection.
45. Encourage retrofitting existing structures for energy conservation.
46. Provide incentives for the use of renewable resources and conservation.

Energy And Natural Resources - Scenic Resources

Unavoidable Impacts

New development will alter the natural landscape and could block some views.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

47. Preserve the rural visual character of much of the County by concentrating growth in a limited number of more intensive development areas.
48. Provide for the preservation of scenic agricultural lands, open spaces, forest lands, critical areas and other scenic resources.
49. Limit development in scenic rural areas to low intensity and low density uses.
50. Recognize natural resource lands as a scenic resource.
51. Provide for the preservation of vegetation, scenic views and viewsheds.
52. Limit building heights to preserve significant views.

Environmental Health - Noise

Unavoidable Impacts

Increased population growth and new development may increase potential noise sources.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

53. Concentrate population growth to a limited number of designated areas to preserve the quiet rural character of Island County.

54. Reduce noise problems by avoiding location of sensitive land uses (i.e. homes, schools and hospitals) near high level noise areas such as airport facilities.

55. Designate compatible land uses to minimize density of people in high aircraft noise areas.

56. Establish criteria for placement of vegetation zones/noise barriers between significant noise sources and adjacent noise sensitive land uses.

57. Establish noise level reducing standards for new construction in moderate and high aircraft noise areas.

58. Encourage use of alternative transportation modes within UGAs and/or RACs to help reduce increases in motor vehicle traffic and mitigate noise problems.

Land And Shoreline Use - Relationship to Existing Land Use Plans and to Estimated Population

Unavoidable Impacts

None identified.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

59. Pursuant to GMA requirements, ensure that all other Island County plans and policies are consistent with the adopted Comprehensive Plan.

60. Establish location criteria for different land uses to be used in evaluating rezone requests and to help determine future growth areas.

61. Establish a process for inventorying existing land uses including vacant lands and updating as development occurs.

62. Ensure the future ability to respond to changing conditions and needs by establishing a process for regular review and amendments to the Future Land Use Plan.

63. Establish concurrency requirements to ensure that development is not permitted until public facilities and service capacity are adequate to meet the needs of the development.

Housing

Unavoidable Impacts

The need for more housing units of various types increases with population growth.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

- 1 64. Minimize public service cost and associated housing costs by concentrating growth in
 UGAs , RACs and PRCs.
- 2 65. Accommodate a variety of housing needs by providing a range of residential densities,
 from low density rural residential development to higher density attached multi-family
3 housing.
- 4 66. Promote housing affordability by encouraging a variety of housing types in appropriate
 locations, including common wall housing, accessory units, manufactured housing,
5 clustered developments, and farm worker housing.
- 6 67. Identify surplus public lands that may be suitable sites for future development of low
 and moderate income housing.
- 7 68. Establish policies and incentives to support the availability of affordable housing.

8 **Light and Glare**

9 **Unavoidable Impacts**

Potential sources of light and glare increase as more development occurs.

10 **Mitigation Measures**

11 The following are potential mitigation measures that the Comprehensive Plan and future
12 regulatory efforts could implement:

- 12 69. Require the use of directional shields and timers on new outdoor lighting.
- 13 70. Establish standards for building and landscape materials that would absorb, rather than
 reflect, light and glare.
- 14 71. Establish development standards that restrict the levels of light and glare that new
15 development may emit.

16 **Aesthetics**

17 **Unavoidable Impacts**

Increased development of natural landscapes reduces overall aesthetic quality.

18 **Mitigation Measures**

19 The following are potential mitigation measures that the Comprehensive Plan and future
20 regulatory efforts could implement:

- 21 72. Provide for the preservation of agricultural and forest resource lands, and protect
 wetlands, fish and wildlife habitats, and steep hillsides.
- 22 73. Limit development in scenic rural areas to low intensity uses, such as agriculture and
 recreation uses.
- 23 74. Limit commercial development to UGAs, RACs, and designated areas.

1 75. Discourage strip retail and haphazard commercial development in rural areas.

2 76. Establish design standards and a design review process for new development.

3 77. Ensure that structures, roads and utility systems are designed and constructed to
4 minimize the unnecessary alteration of the landscape and to preserve natural systems
5 and scenic amenities.

6 **Recreation**

7 **Unavoidable Impacts**

8 Increase in population can increase demand on the available supply of recreational
9 facilities, lowering the level of service of recreational facilities.

10 **Mitigation Measures**

11 The following are potential mitigation measures that the Comprehensive Plan and future
12 regulatory efforts could implement:

13 78. Implement recommendations outlined in the County Comprehensive Parks and
14 Recreation Plan.

15 79. Establish an inter-connected open space network throughout Island County.

16 80. Identify priority areas for future open space acquisition.

17 81. Require that new development provide recreational open space to meet the established
18 standards.

19 82. Seek funds to acquire new open space by assessing impact fees on new development,
20 issuing open space bonds, or pursuing other funding sources.

21 **Historic and Cultural Preservation**

22 **Unavoidable Impacts**

23 None identified.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future
regulatory efforts could implement:

83. Work with the Washington State Office of Historic Preservation to identify and
document priority historic and/or cultural sites and establish criteria for evaluation of
future sites.

84. Continue to carry out the objectives of the Ebey's Landing National Historical Reserve,
and continue to support the functions of the Central Whidbey Island Historical
Preservation District Advisory Committee.

1 85. Continue to provide and develop additional incentives to preserve historic structures
such as reduced tax assessments and the purchase of development rights.

2 86. Give high priority to the preservation of historic and cultural sites when redevelopment
plans are reviewed.

3 87. Encourage the rehabilitation of historic structures.

4 **Natural Resource Lands**

5 **Mitigation Measures**

6 The following are potential mitigation measures that the Comprehensive Plan and future
policy and regulatory efforts could implement:

7 88. Reduce development pressure on designated natural resource lands by concentrating
growth in UGAs, RACs and PRCs, and away from resource lands.

8 89. Explicitly preserve resource lands through agricultural, forest, and mineral resource
lands zoning designations, large minimum lot sizes and other zoning techniques,
9 preferential tax treatment, TDR programs, and other creative techniques.

10 90. Reduce the potential for conflict between resource lands and adjacent uses by promoting
special buffers, setbacks, and opportunities for clustered development.

11 **Transportation**

12 **Significant Unavoidable Impacts**

13 Increased population will result in increased traffic and demand for transportation system
14 improvements.

15 **Mitigation Measures**

16 The following are potential mitigation measures that the Comprehensive Plan and future
regulatory efforts could implement:

17 91. Promote greater transportation system efficiencies, such as transit and other alternative
modes of transportation, by creating designated areas with relatively higher residential
densities.

18 92. Minimize trip lengths and maximize the opportunity for non-motorized transportation
19 by locating services and employment centers near residential areas.

20 93. Establish a land use pattern that contributes to a decreased reliance on the private
automobile. This may include residential densities that are high enough to support
transit, location of services and employment near residential areas, and development
21 standards that promote ease of access to transit and other alternative modes of
transportation between UGAs, RACs and PRCs.

94. Assist in future transportation planning by clearly designating the location of future population concentrations and other traffic generators.
95. Pursuant to the GMA, establish levels of services for the future transportation system.
96. Identify specific transportation system improvements that would be necessary to maintain the established level of service.
97. Require funding and construction of major transportation facilities concurrent with new development.
98. Establish a land use pattern that would minimize future traffic hazards due to congestion and the need to build transportation system improvements through hazardous areas, such as floodplains and steep slopes.
99. Assist in the avoidance of future traffic hazards by providing some predictability and improved ability to plan needed improvements.
100. Seek additional funding for the correction of existing and projected traffic hazard areas.

Public Services And Utilities - Fire/Law Enforcement/Government Services

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

101. Emphasize a compact land use pattern that would increase the efficiency of fire and emergency service delivery.
102. Assist future fire service planning by providing direction regarding future population growth.
103. Establish levels of service for fire services, sheriff response times, and facilities that are adequate to meet the needs of new development.
104. Emphasize a compact development pattern that would increase the efficiency and economy of police and public safety service delivery.
105. Assist future service law enforcement planning by providing direction regarding future growth areas.
106. Prohibit new development until law enforcement services are adequate to meet the needs of the development.
107. Concentrate growth in designated areas to provide for better access and more efficient provision of County services.
108. Establish levels of service for administrative County services.
109. Consider enhancement of user fees and other techniques to fund needed increases in services.

Public Services And Utilities - Schools

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

110. Provide concentration of growth in the UGAs and/or RACs to reduce reliance on school buses, reduce the length of school bus trips, and to increase the efficient use of existing and future school facilities.

111. Assist in future school needs planning by providing clear guidance on the direction of future growth.

112. Establish a level of service for school facility capacity.

113. Require impact fees on new development to pay a fair share of the cost of facilities needed to service the new student population of the development.

Public Services and Utilities - Parks and Other Recreational Facilities

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future development regulations could implement:

114. Establish an inter-connected open space network throughout Island County.

115. Identify and document priority areas for future recreational facilities acquisition.

116. Assist future open space and recreational service planning by clearly designating future population areas.

117. Identify resources and criteria for additional recreational service funding.

Public Services And Utilities - Communications

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future development regulations could implement:

118. Identify criteria for the location and evaluation of potential communication facilities.

119. Establish design standards and a design review process for evaluation of potential communication facilities.

Public Services and Utilities - Water/Stormwater

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future development regulations could implement:

120. Plan and implement a County-wide stormwater control system by providing direction regarding future growth.

121. Minimize the potential increase in stormwater flows in the more intensively developed areas by encouraging a development pattern that minimizes impervious surface coverage, such as clustered development, multi-story buildings, or other innovative building designs. Provide stormwater detention facilities.

122. Limit new development in the floodplain to low-intensity uses, such as agriculture and recreation.

123. Encourage the retention of vegetation and use of natural stormwater management facilities, such as biofiltration swales.

124. Establish levels of service for stormwater facilities.

125. Establish concurrency requirements for stormwater facilities adequate to meet the needs of new development.

Public Services and Utilities - Sewer/Septage/Solid Waste

Unavoidable Impacts

New growth and development will result in increased demand for public services and utilities, including fire, law enforcement, school facilities, park and recreation facilities, stormwater facilities and sewer and solid waste collection services.

Mitigation Measures

The following are potential mitigation measures that the Comprehensive Plan and future regulatory efforts could implement:

126. Concentrate growth to provide for more efficient sewer system design and solid waste collection routes.

127. Assist future sewer and solid waste planning by providing direction regarding future population growth.

128. Accommodate public sewer systems and solid waste recycling programs by providing an adequate population base to support such services.

129. Prohibit the development of new community septic systems in the more intensively developed areas, except on an interim basis.

130. Provide coordinated planning for sanitary sewer when existing development patterns present adverse environmental impacts and unsanitary health conditions.

1 131. Provide for solid waste service planning on a regional, County-wide basis.

2 132. Over time, evaluate the need for expansion of existing solid waste facilities.

3 133. Over time, evaluate the need for enhancement of sanitary sewer output treatment
4 processes.

5 The following mitigation measures have been added per request by the Swinomish Tribal
6 Community.

7 134. Work with the Washington State Office of Archaeology and Historic Preservation
8 and affected Indian Tribes to identify and protect archaeological sites in the County.

9 135. Continue to require property owners or project proponents to avoid or mitigate
10 impacts to archaeological sites during any proposed development projects.

11 136. Continue to operate under the policy preferring avoidance of impacts to
12 archaeological sites during any proposed development project.

13 137. Provide training for County permitting staff in archaeology and culture of Indians of
14 Island County.