

**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 6<sup>TH</sup> 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

  
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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.

1 **FEIS CONTENTS**

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

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

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

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

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

18 The Draft Technical Appendices includes the following:

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

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

11 **RESPONSE TO COMMENTS**

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

15 **DEIS Staff Draft Land Use Element - November 12, 1996**

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

21 **SUMMARIZED RESPONSES**

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

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

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

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

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

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

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

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

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

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

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

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

33 RESPONSE: The potential mitigation measures identified in the DEIS are offered as a list of  
34 options the County could pursue in off-setting the effects of increased growth. They were not  
35 intended to function as policy statements or to be prescriptive in nature. They have been  
36 used to guide development of plan policies and development regulations. They have also  
37 been used in the SDEIS for the Phase B Team Draft Comprehensive Plan and development  
38 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.

2      **6. Issue:** DNR supports the Plan in  
3      modifying the Transfer of Development  
4      Rights (TDR) Program in a way to give  
5      incentives for Agriculture and Forest  
6      Lands owners to manage their lands as  
7      such.

8      **Response:** Comment acknowledged.  
9      However, the use of a TDR program has  
10     been eliminated in the current plan draft.  
11     See discussions of currently proposed  
12     Agriculture and Forest protection  
13     incentives in the SDEIS for the Phase B  
14     Team Draft Comprehensive Plan and  
15     development regulations.

16     **7. Issue:** DNR supports the integrating of  
17     the shoreline land use designations of the  
18     Shoreline Master Plan (SMP) into the  
19     Comprehensive Plan.

20     **Response:** Comment acknowledged.

21     **8. Issue:** DNR recommends that the Plan  
22     would be further enhanced if it would  
23     relate all shoreline zoning to the specific  
24     shoreline designations of the SMP as  
25     was done with the Shoreline Residential  
26     PRDs section.

27     **Response:** Comment acknowledged.

28     **9. Issue:** DNR suggests that the Land Use  
29     Element recognize DNR's jurisdiction  
30     over forest practices under the authority  
31     of the Forest Practices Act and surface  
32     mining reclamation on operations in  
33     excess of three acres under the authority  
34     of the Surface Mining Act.

35     **Response:** Comment acknowledged.

36     **10. Issue:** Due to the seriousness of  
37     wildfire, DNR recommends that the Plan  
38     should address the following for both  
39     rural and resource lands: (a) sufficient  
40     fuel free areas around structures; (b) fire  
41     resistant roofing materials; (c) adequate  
42     ingress and egress routes and  
43     turnarounds for emergency units; and (d)  
44     adequate water supply with back up  
45     power generation equipment or other  
46     means to cost effectively deliver water to  
47     the fire.

48     **Response:** Comment acknowledged.

49     **11. Issue:** Pages 36 (3rd paragraph) and  
50     page 154, item I contain language that is  
51     not accurate. It is not the Department's  
52     position that Department managed lands  
53     "will be sold in the near future". DNR  
54     recommends that the two references be  
55     deleted from the Plan.

56     **Response:** These references have been  
57     removed.

58     **12. Issue:** Regarding page 188, Fish and  
59     Wildlife Habitat Conservation Area  
60     Policies, DNR points out that the Plan  
61     does not include maps defining the  
62     location of commercial and recreational  
63     shellfish beds, kelp and eelgrass beds  
64     and herring and smelt spawning areas.  
65     DNR recommends that the Plan  
66     reference the Department of Ecology's  
67     Coastal Zone Atlas for Island County  
68     and the WDFW Technical Report  
69     Number 79 in the Land Use Element and  
70     utilize this information when making  
71     planning decisions that influence these  
72     aquatic resources.

73     **Response:** Comment acknowledged.  
74     New maps have been prepared for the  
75     comprehensive plan.

76     **Regional Agencies/Governments**

77     **Response to the Island County Department of**  
78     **Public Works - Letter No. 3**

79     **Issue:** The Public Works Department  
80     makes numerous comments concerning

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 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

45   of the paragraph to read: “Rural  
46   landscape features and lifestyles would  
47   be preserved through implementation of  
48   policies that actively contain urban  
49   growth inside UGAs and PRCs.”

50   **Response:** Comment acknowledged.

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

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

70   **8. Issue:** The generally sound mitigation  
71   measures listed in pages 120 through  
72   132 are all made meaningless since  
73   every subsection begins with the words  
74   “The following are potential mitigation  
75   measures that the Comprehensive Plan  
76   (and future regulatory efforts) could  
77   implement”. CSD suggests deleting this  
78   clause wherever it occurs.

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

81   **9. Issue:** The GMA requires Counties to  
82   take meaningful measures to protect  
83   environmental quality, etc. With all its  
84   current qualifiers (see #8 above), this  
85   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.

1   **3. Issue:** The critical areas protection is  
2   too weak. View clearing in wetlands is  
3   unacceptable, especially without public  
4   review.

5   **Response:** Comment acknowledged.

6   **4. Issue:** There is no policy for preventing  
7   extinction of native species.

8   **Response:** Comment acknowledged

9   **5. Issue:** The Plan needs strong,  
10   ecologically based protection of  
11   wetlands and rare species, including  
12   native species.

13   **Response:** Comment acknowledged.  
14   See discussions of environmental  
15   protection measures in the SDEIS for the  
16   Phase B Team Draft.

17   **6. Issue:** The Plan commits the county to  
18   alternative water supply studies  
19   including importation of water,  
20   desalinization and distribution of water  
21   within the county. These are contrary to  
22   the wishes of a majority of island  
23   residents and have significant economic  
24   and environmental impacts.  
25   Sustainability, living within one's  
26   natural carrying capacity, needs to be  
27   part of the Plan.

28   **Response:** Comment acknowledged.

29   **7. Issue:** Words such as "potential",  
30   "when appropriate", "could", etc.  
31   weaken or make meaningless mitigation  
32   measures and protections for  
33   environmental quality, habitat, scenic  
34   and historic areas and critical areas,  
35   especially wetlands.

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

38   **8. Issue:** There is a need to plan the  
39   county's economic and environmental  
40   future with equal strength. Data

41   indicates that destroyed environments  
42   result in destroyed economies.

43   **Response:** Comment acknowledged.

44   **9. Issue:** Preferred Alternative 4 is the  
45   most environmentally damaging of the  
46   "real" alternatives. It would have the  
47   least efficient system of utilities, services  
48   and transportation.

49   **Response:** Comment acknowledged.

50   **Response to William R. Applegate -**  
51   **Letter No. 14**

52   **1. Issue:** The DEIS does not adequately  
53   address the problem of saltwater  
54   intrusion. The proposed PRCs are being  
55   located in the areas of existing saltwater  
56   intrusion.

57   **Response:** Comment acknowledged.

58   **2. Issue:** Referring to item 5, page 122,  
59   "Locate new wells inland, away from the  
60   coast and especially narrow points of  
61   land to reduce potential salt water  
62   intrusion". Will this be a requirement  
63   placed on PRCs if they need to develop  
64   new wells?

65   **Response:** New wells will be required  
66   to conform to the County's regulations  
67   relative to issues of water quality and  
68   availability.

69   **Response to Kim Drury - Letter No. 15**

70   **1. Issue:** Notes that the options of  
71   desalinization and importing new water  
72   supplies would encourage more  
73   development in order to spread their  
74   associated costs. They could also have  
75   significant unintended environmental  
76   consequences to existing water supplies  
77   and drainage systems.

78   **Response:** Comment acknowledged.

1    2. **Issue:** Allowing 2.5 houses per acre  
2    (Shoreline Residential PRDs) will result  
3    in more sprawl, degrading the rural  
4    character of the county.

5    **Response:** Comment acknowledged.

6    3. **Issue:** The Plan should contain a long-  
7    term agriculture and forest plan for the  
8    county, providing incentives and credits  
9    for maintaining these uses.

10   **Response:** Comment acknowledged.  
11   Incentives have been included in the  
12   current drafts of the comprehensive plan  
13   and development regulations. See  
14   discussions in the SDEIS for the Phase B  
15   Team Draft and development  
16   regulations.

17   4. **Issue:** The Plan should strengthen  
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  
29   some of the Plan's most basic elements  
30   to better reflect the link between  
31   environmental protection and sustainable  
32   development; to ensure that Whidbey  
33   and Camano Islands retain their rural  
34   character, and to ensure that the values  
35   of already developed properties are not  
36   degraded due to many impacts of  
37   increased development including sprawl,  
38   lack of available water supply and  
39   increased traffic.

40   **Response:** Comment acknowledged.  
41   Subsequent information and analysis has  
42   been provided in the Phase B Team

43   Draft Comprehensive Plan and  
44   associated Technical Appendices. See in  
45   particular the Land Use, Water, and  
46   Transportation elements.

47   **Response to Dean Enell - Letter No. 16**

48   1. **Issue:** Fully Contained New  
49   Communities should be eliminated from  
50   the Plan. The county does not have  
51   ground water resources to support such  
52   localized development.

53   **Response:** See response #3 on page 4 of  
54   this document.

55   2. **Issue:** The protection offered for  
56   wetlands in the Plan is far too hazy; it  
57   should be made more specific.

58   **Response:** Comment acknowledged.

59   **Response to Dean Enell (Dec. 27, 1996) -**  
60   **Letter No. 17**

61   1. **Issue:** States that down zoning of  
62   shoreline areas is necessary to prevent  
63   sprawl, and because of the water and  
64   septic potential of this fragile area of the  
65   county dictates that it not be densely  
66   "developed".

67   **Response:** Comment acknowledged.

68   2. **Issue:** Compliments the county's  
69   current water planning efforts. States  
70   that the county must figure out how  
71   much ground water can be safely tapped  
72   into, while not waiting until disaster  
73   strikes in the form of salt water intrusion  
74   (of which already has occurred).

75   **Response:** Comment acknowledged.

76   3. **Issue:** States that wetlands are an  
77   absolute necessity to a healthy  
78   environment.

79   **Response:** Comment acknowledged.

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  
2      particular concern to us is the  
3      designation of the Nichols Brothers Boat  
4      Builders' (Nichols Brothers) property to  
5      LMS (Figure A.8) without a project  
6      specific EIS or mitigating conditions.

7      **Response:** A project specific EIS is not  
8      a required since the establishment of  
9      land use designations during the  
10     development of a comprehensive plan  
11     are non-project actions under SEPA.

12     4. **Issue:** Mr. Hale states that Business and  
13     Office Parks (BOP) (no definition in the  
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  
26     transportation system are created by  
27     permitting commercial development to  
28     be divide by a principal State highway?

29     **Response:** Transportation impacts are  
30     discussed and mitigated within the  
31     Transportation Element of the current  
32     plan draft. There would likely be safety  
33     issues concerned with turning  
34     movements across the highway, which in  
35     some cases would require installation of  
36     signal lights.

37     7. **Issue:** There needs to be an analysis of  
38     the environmental impacts of non-  
39     enforcement of land use regulations and  
40     the violation of "Neighbors Rights". Mr.  
41     Hale's definition of "Neighbors Rights"  
42     is "not having to accept the

43      environmental impacts from neighboring  
44      parcels and/or the community at large  
45      without compensation". The non-  
46      enforcement policy in Island County has  
47      largely negated efforts (mitigating  
48      conditions and zoning codes) to diminish  
49      the negative impacts to the elements of  
50      the environment listed in WAC 197-11-  
51      444. The non-enforcement case he cites  
52      is the Nichols Brothers development.

53      **Response:** Comment acknowledged.

54     5. **Response to Karen Hamalainen - Letter  
55     No. 20**

56     1. **Issue:** Recommends that for  
57     Alternatives 2, 3, and 4, the Plan should  
58     clearly designate the "built-up"  
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.

64     2. **Issue:** Points out that the existing PRCs,  
65     which have space for in-fill potential, are  
66     not necessarily located where growth  
67     may be best handled (outside of critical  
68     areas, where they are less costly to the  
69     sole source aquifer).

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.

76     6. **Response to Rebecca Heil - Letter No. 21**

77     1. **Issue:** Objects to the proposed Holmes  
78     Harbor development in the plan.  
79     Concerned about water availability,  
80     sewage treatment, high density

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

41 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 McConaughey (Dec. 42 12, 1996) - Public Testimony No. 3**

43 1. **Issue:** Mr. McConaughey 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

1        "no action" alternative which under the  
2        GMA is not a logical alternative. Three  
3        other alternatives were considered; one  
4        was taking the population figure  
5        allocated to Island County by the OFM  
6        and directing it to cities and their  
7        designated urban growth areas; another  
8        alternative was to direct the growth into  
9        UGAs as well as RACs, with some  
10       expansion in the PRCs; the last  
11       alternative was to direct the growth more  
12       evenly to UGAs, RACs, and the existing  
13       PRCs. He noted that Alternative 4 more  
14       accurately accounts for the current  
15       pattern of development in the County,  
16       but constrains further expansion of this  
17       pattern in a manner that would result in  
18       sprawl.

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

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

38  
39       PHASE A TEAM DRAFT LAND USE  
40       ELEMENT March 9, 1998

41       State Agencies

42       **Response to State Department of  
43       Transportation - Letter No. 1**

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

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

58       **Regional Agencies/Governments**

59       **Response to City of Langley - Letter No.  
60       2**

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

68       **Response:** See discussion of SEPA/GMA  
69       integration at the beginning of this  
70       document.

71       **Organizations**

72       **Response to Land Strategies - Letter No.  
73       3**

74       **Issue:** The SDEIS should include  
75       discussion of impacts from Master Planned  
76       Resorts.

77       **Response:** Comment acknowledged.

78       **Response to Whidbey Islanders for a  
79       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 **1 Public Testimony**

2 **2 Response to Steve Erickson - Public**

3 **3 Testimony #1**

4 **4 Issue:** What is the justification for a phased review?

5

6 **6 Response:** See discussions at the beginning

7 of this document on page 1 and 2.

8 **8 Response to Bill Thorn - Public**

9 **9 Testimony #2**

10 **10 Issue:** SEPA review should be suspended

11 until all parts of the plan are available for

12 public review.

13 **13 Response:** See response to letter N. 9

14 above.

15 **15 Response to Tom Roehl - Public**

16 **16 Testimony #3**

17 **17 Issue:** The SEPA comment period should

18 be extended and the SDEIS does not reflect

19 the changes made to the plan.

20 **20 Response:** Comment acknowledged. See

21 also response (1) on page 3 of this

22 document.

23

24 **24 PHASE B TEAM DRAFT COMPREHENSIVE**

25 **25 PLAN AND DEVELOPMENT REGULATIONS**

26 **26 JULY 14, 1998**

27 **27 State Agencies**

28 No comments received.

29 **29 Regional Agencies/Governments**

30 **30 Response to Swinomish Tribal**

31 **31 Community - Letter No. 1**

32 **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 **36 Response:** Acknowledged. These items

37 have been added to the list of potential

38 mitigation measures in Appendix 'C'.

39 **39 Organizations**

40 **40 Response to Island County Citizens'**

41 **41 Growth Management Coalition - Letter**

42 **42 No. 2**

43 **43 Issue:** The Coalition has suggested several

44 wording changes to the SDEIS to reflect that

45 specific issues are still not resolved.

46 **46 Response:** Comments acknowledged.

47 **47 Individuals**

48 **48 Response to Bill Thorn - Letter No. 3**

49 **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 **53 Response:** Acknowledged. This has been

54 corrected.

55 **55 Response to William R. Applegate -**

56 **56 Letter No. 4**

57 **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 **63 Response:** Comment acknowledged.

64 **64 Public Testimony**

65 **65 Response to Reece Causey - Public**

66 **66 Testimony No. 1**

67 **67 Issue:** Appendix 'C' contains several

68 mitigation measures that she thought had

69 been eliminated, such as the use of TDRs.

70 **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.

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**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

1                   **Chapter 17.05 Shoreline Use Regulations**

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

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

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

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

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

35                   **COMPREHENSIVE PLAN ELEMENTS**

36        In this section the other Comprehensive Plan elements are reviewed for consistency with the land  
37        use element. Each element of the plan has particular information and analysis requirements as  
38        stipulated under the GMA. Taken together these requirements are intended to be mutually  
39        supportive and interrelate the information and planned actions between the various elements.  
40        Much of this information has an environmental component and provides a reasonable means to  
41        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.

2 **Land Use Element - Overview**

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

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

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

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

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

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

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

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

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

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

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

38

- 39 • Zoning code - has been reorganized to reflect the land use designations, densities, rural  
40 development conditions, and locations identified within the proposed comprehensive  
41 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.

## 19 **Natural Lands Element**

20 Island County has chosen to develop a Natural Lands element to its comprehensive plan as a  
21 result of the strong interest in this issue expressed by county residents. The protection or  
22 conservation of natural lands is perceived as having significant economic, as well as important  
23 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  
habitats, tributary streams and their buffers, shorelines, habitat for protected species, and  
resource lands of long-term commercial significance, between 50% and 75% of lands in "open  
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.

21 Goals and policies are included in this element. They have been identified through the public  
22 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.  
23 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.

24 A particularly important part of this element is the identification of a listing of Candidate Sites  
25 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.  
4 Implementation strategies are discussed at the end of the element and include tax exempt  
5 programs, purchase/donation of easement rights, transfer of rights, and out right acquisition. [80]

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

9 **Shoreline Element**

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

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

21 Chapter II classifies the County's shorelines into different types of environments in order to  
22 recognize that the shorelines are not uniform and vary as to biophysical limitations and past  
23 development activity. As stated in the SMA, the environment designation given to any specific  
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.

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

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

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

3 The other addition is the Aquatic Environment designation. The Aquatic Environment is the  
4 water surface together with the underlying lands and the water column of all marine waters, all  
5 lakes, and all streams; including but not limited to bays, straits, harbors, waterways, tidelands,  
6 beds, and shorelands seaward of the ordinary high water mark, and associated wetlands. A  
7 subclassification, Aquatic-Conservation Environment, is an area which has been identified as a  
8 critical biological area with exceptionally high ecological value or shellfish and/or fish life and  
9 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.

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

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

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

#### 23 **Water Resources Element**

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

##### 28 **COORDINATED WATER SYSTEM PLAN [32, 35]**

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

###### 34 ***Utility Service Review Procedure [31, 32]***

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

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

2     *Conservation* [33]

3     Water conservation requirements for new water systems include:

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

7     *Design Standards* [33, 35]

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

10    • Metering at the well head.  
11    • Metering individual connections.  
12    • Water level device installed in the well for water level measurements.

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

19    **GROUNDWATER MANAGEMENT PROGRAM** [7, 35]

20    In 1992, the Ground Water Management Program (GWMP) was completed, pursuant to RCW  
21    90.44, and adopted as part of the Island County Comprehensive Plan. Major elements being  
22    implemented by the Island County Health Department since the plan's adoption include the  
23    following:

24    Conservation Program: [27]

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

32    Ground Water Monitoring and Evaluation: [27]

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

3 Water Level Monitoring – Water systems in high and medium risk areas require water  
4 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  
5 biannually during water sample collection of the 60 + wells in the monitoring network  
managed by the County Hydrogeologist.

6 Water Quality Monitoring – The current well monitoring program managed by the  
7 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  
8 building permits per ICC 8.09.

9 **Ground Water-Availability Requirement: [31]**

10 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  
11 source and supply and protection of groundwater resources.

12 **Ground Water Recharge Measures: [35]**

13 Critical Recharge Area Protection was incorporated into ICC 8.09 in 1992. All projects  
14 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.  
15 Geological Survey.

16 **Pollution Source Controls: [31]**

17 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  
18 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.  
19 ICC 8.09 complies with GMA requirements for verification of water availability and  
adequacy requirements for building permits and subdivisions.

20 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  
21 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.  
22 [35]

23 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

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

5

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

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

## 19 **Housing Element [68]**

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

22 This element performs a housing needs analysis that is aimed at the issue of affordability.  
23 Housing is considered affordable if housing costs represent 30% or less of a household's income.  
24 Analysis is based on population characteristics and demographic trends, comparison of housing  
25 costs relative to household incomes, trends in housing construction, and a forecast of the number  
26 of low and moderate income households through the year 2020. Discussions include elderly and  
27 special needs housing demand.

28 An inventory of land potentially available for housing is included. It identifies that there are  
29 16,646 to 19,279 lots potentially available in the Residential and Rural Residential land use  
30 designations. Demand for buildable residential lots, including a 25% market factor, is estimated  
31 at 15,250, assuming 2.5 persons per residence. There appears to be more lots potentially  
32 available than needed to meet overall housing demand.

33 In meeting the projected housing needs reliance has been placed on the use of density bonuses.  
34 An Earned Development Unit program allows for higher density in exchange for protection of a  
35 variety of identified natural lands. PRDs are also given a standard 100% density bonus and a  
36 200% bonus in an Urban Transition Overlay zone within the Rural lands designation. Higher  
37 density contributes to lower housing cost, but by itself is a limited tool. Policies provided at the  
38 end of the element have been reviewed and are consistent with the intent of the Land Use  
39 Element. Through this element the County is committed to developing a monitoring program to  
40 track its performance relative to housing goals and policies.

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

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

## 10 **Transportation Element**

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

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

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

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

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

34 Level of service (LOS) standards are established in Section IV. LOS standards are required  
35 under GMA for roads and highways. LOS standards are provided for highways/roadways,  
36 intersections, transit service, and marine transportation (ferries). The LOS is based on accepted  
37 industry standards including the threshold traffic volumes that are associated with a defined LOS.  
38 [95]

1 Section VI Future Conditions summarizes the impact on county roads, intersections, transit  
2 service, and ferry service as the result of new growth. Impacts are measured in terms of the  
3 increase in traffic volumes and the effect they have on the level of service. Table VI-1 shows  
4 traffic volumes and levels of service for all major county roads for the years 1996, 2003, and  
5 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.

6 State routes account for approximately 54 miles of roadways in the County. They provide the  
7 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:

- 8 • SR 20 from Deception Pass to Troxell Road (LOS 'E') (note: LOS 'E' is second to last)
- 9 • 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')

10 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':

- 11 • 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

14 While not included in the analysis, State Department of Transportation staff have indicated that  
15 the impacts to the level of service for these sections of highway are independent of the  
16 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.

17 Relative to on/off island traffic volumes, the land use concept is intended to mitigate additional  
18 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.

20 Proposed improvements are addressed in Section VII. Several tables summarize the  
improvements to selected facilities needed to maintain the established LOS standards. Table  
21 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]

1 Transit improvements are also addressed. Information includes areas identified for increased  
2 service, commuter service improvements, paratransit service, and supporting programs. Marine  
3 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.

4 A financial analysis is provided in Section VIII. This section identifies funding sources and  
5 forecasts the revenue available for transportation improvements through the year 2020. Roadway  
6 project costs and revenues are summarized in Table VIII-1 through Table VIII-8. This  
7 information is separated into State highways and County roads since the State is responsible for  
8 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]

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

13 This element does not contain a discussion of how transportation planning is coordinated  
14 between different governments and agencies. Policy 5.2 establishes intergovernmental  
15 coordination as a goal, but there does not appear to be any specific action or plan as to how this  
16 will be done. This is important in terms of establishing mutually supporting levels of service and  
17 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.

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

19 Capital Facilities is another required plan element under GMA. The Objectives, Principles, and  
20 Standards section establishes the definition of facilities, LOS standards , and the policy  
21 framework of the element. LOS standards are established under 'Public Facility Needs' for  
22 arterial roads and transit routes, domestic water, community parks, sanitary sewer and septic  
23 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:

19 Detention and Correction Facilities - Current capacity at the island County  
20 Detention/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.

21 County Government Buildings: - This analysis includes general administration, courts,  
22 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 continuos 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  
24 ICC 11.01 Land Development Standards. In addition, the County is preparing  
25 Comprehensive Storm Water and Flood Hazard Management Plan. The County has also  
26 prepared a Storm Water Improvement Program that identifies project schedules and  
27 funding. Storm water facility projects are also included in certain transportation projects.

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

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

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

35 The Capital Facilities Element has been prepared consistent with the land use and growth  
36 assumptions established in the Land Use Element. Estimates of capital improvement needs have  
37 been based on the land use population projections in terms of both numbers and locations.  
38 Missing from the analysis is a preliminary schedule of capital improvements beyond the year  
39 2004. This information would be a useful guide in the annual updating of the Six-Year Capital  
40 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  
2 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  
7 and Transportation Commission (WUTC). Therefore, this element is not intended to establish  
8 how, when, or where utilities facilities should be provided. The various utility providers do this  
themselves based on demand for their services.

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

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

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

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

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

28 **Parks and Recreation Element**

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

32 This element establishes a set of goals and policies that address several issues regarding the  
33 provision of recreation opportunities. They include such things as on-going planning,  
34 maintaining rural character, environmental stewardship, shoreline access, open space corridors  
35 and greenbelts, agency coordination, and public involvement. A special issues section discusses  
36 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.

## DEVELOPMENT REGULATIONS

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

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

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

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

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

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

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

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

4 Chapter 16.14C Environmental Policy - to comply with legislative updates to the State  
5 Environmental Policy Act as required as required in WAC 197-11. Amendments include  
6 raising the categorical exempt levels for SEPA review for accessory farm structures  
7 (10,000 to 30,000 square feet) and landfill/excavations (100 to 500 cubic yards).

8 Chapter 16.15 Site Plan Review - procedural amendments that add to and modify the list of  
9 land uses requiring a site plan review, adjust procedures to be consistent with Chapter  
10 16.19 Land Use Review Process, and make appropriate reference to GMA requirements  
11 and the comprehensive plan.

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

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

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

## 23 **Chapter 17.03 Island County Zoning Ordinance [59]**

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

### 22 **ZONING DISTRICTS [60, 74, 75, 92, 93]**

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

1 Subsection C provides for the preparation of zoning maps that depict the boundaries of the  
2 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.

3 In particular, Chapter 17.03.070(D) establishes the designation criteria for properties in the Rural  
4 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  
5 residential areas of more intensive development that meet the zoning criteria. In earlier phases of  
6 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  
7 Department. The areas listed in the code are consistent with areas depicted on the land use maps  
in the Land Use Element.

8 The following table lists the land use designations established in the Land Use Element along  
9 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>
11	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
13	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
14	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
15	Light Manufacturing Lands (LM)	Chapter 17.03.145 Light Manufacturing (LM) Zone
16	Airport Districts (AP)	Chapter 17.03.150 Airport (AP)
	Special Review District (SR)	Chapter 17.03.160 Special Review District
17	Mineral Lands Overlay	Chapter 17.03.180.Q Land Use Standards - Surface Mining

18 Each zoning district has an associated purpose statement at the beginning of each of the  
19 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.

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

22 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

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

2 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  
3 discussion on page 51).

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

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

#### 17 ZONING DISTRICT LAND USES [49, 52, 60, 74]

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

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

29 Table A, B, and C in Chapter 17.03.030 and the uses listed in the zoning district regulations were  
30 compared with the Land Use Element. Chapter IV Goals and Policies, Rural Element Land Use  
31 Designations Policies and Resource Lands set out the types of uses envisioned for each of the  
32 land use designations. The permitted and conditional uses listed in Chapters 17.03.060 through  
33 17.03.150 appear to be consistent with the land use designation policies in the Land Use  
34 Element.

#### 35 OTHER ZONING PROVISIONS

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

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

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

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

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

11 Section D. Earned Development Units (EDU): Establishes a density incentive  
program to preserve productive lands in the Rural Forest (RF), Rural Agriculture (RA), and  
12 Commercial Agriculture (CA) zones. Density is tied to the length of time a parcel of land is  
held for productive agriculture or forest use. The density can be applied on a portion of the  
13 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  
14 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  
15 Management Plan for the resource land that is to be preserved. The EDU program is  
voluntary. [6, 41, 89, 90]

16 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  
17 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  
18 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  
19 help ensure that the most productive farm and forest land is conserved. [6, 41, 89, 90]

20 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  
21 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  
22 RS zones. [70, 76]

1      Section N. Signs and Lighting:      A lighting provisions has been added,  
2      17.03.180.N.5, that requires fixtures be designed and oriented to avoid glare onto adjacent  
3      properties. It also appears to require motion sensing devices to ensure lights go off when not  
4      in use, reducing light and glare and conserving energy. [69, 71]

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

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

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

15    *High Priority Open Space Resources:*

16      Resource and Rural Agriculture Lands  
17      Rural Forest Lands  
18      Natural Shoreline Environments  
19      Stream Corridors  
20      Significant Fish and Wildlife Habitat  
21      Conservation Areas and  
22      Special Pant Sites  
23      Historic Landmarks/Archeological Sites  
24      Private Lands within National Preserves  
25      Category 'A' Wetlands

26    *Medium Priority Open Space Resources:*

27      Conservancy Shoreline Environments  
28      Flood Hazard Buffer Areas  
29      Geologic Hazard Buffer Areas  
30      Scenic Natural Resources Viewpoints  
31      and View Corridors  
32      Urban Growth Area Open Space  
33      Public Lands Buffer  
34      Category 'B' Wetlands

35    *Low Priority Open Space Resources:*

36      Privately Owned Trails and Corridors  
37      Category 'C' Wetlands

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

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

1 2 3 4 5 6	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

7 The definitions in Section II also contain eligibility criteria. For several of the categories there  
 8 are dimensional requirements, such as minimum area for agriculture lands and scenic resources  
 9 or minimum widths for eligible buffer areas. Other eligibility criteria are tied to definitions or  
 10 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.

11 The Public Benefit Rating System is an implementation strategy identified in the Natural Lands  
 12 Element. State law permits counties to offer reductions in property taxes as an incentive in  
 13 exchange for agreements to conserve or protect farm lands, forest lands, or open space. Many  
 14 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.

15 Some view the ‘tax shift’ which occurs with these programs as a disadvantage. When a property  
 16 is granted a tax reduction, the value of that reduction is spread among all other properties within  
 17 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.

## 18 Chapter 17.04      Critical Areas

19 Chapter 17.04 Establishes the general requirements and regulations for the protection of critical  
 20 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.

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

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

2 **OVERLAY ZONES:**

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

8 B. Steep/Unstable Slopes (s): Steep and unstable slopes are declared to be an  
9 environmentally sensitive area in this section. Regulations applicable to slopes are contained  
10 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  
12 and erosion potential.

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

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

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

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

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

30 **Chapter 17.05 Shoreline Use Regulations**

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

34 Sections 17.05.005 through 17.05.045 establish the purpose of the chapter, includes a more  
35 extensive list of development definitions, identifies the relationship to other development  
36 regulations, establishes permitted uses for the six shoreline environment designations, identifies  
37 activities exempt from shoreline permit/regulatory requirements, and outlines general shoreline  
38 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.

24 - Provisions for protection of adjacent views in areas of previous development.

25 - Limitations on the location of accessory structures, i.e. in general, they may not be  
26 further waterward of the primary residential structure or be located in the shoreline  
27 setback.

28 - All structures are to be designed and located so as not to require the use of bulkheads or  
29 other shore works.

30 - Subdivisions have several restrictions including allowing for sufficient lot depth on  
31 feeder bluffs so bulkheads are not required, setbacks in conformance with the underlying  
32 zoning, and location of septic drainfields away from bluffs and geologically hazardous  
33 areas.

34 - Retention of natural vegetation on bluffs and steep slopes and allowing no more than  
35 50% of the shoreline vegetation to be removed.

36 - Stairways and trams are considered a normal residential appurtenance, but must comply  
37 with several development restrictions including avoiding unstable slopes, not requiring  
38 the use of bulkheads, minimize loss of vegetation, shall be the minimum necessary to  
39 provide shoreline access and may not include a deck, and shall be located as far inland as  
40 possible.

1 17.05.120 Shore Defense Works - has been amended and updated to comply with recent  
2 SMA legislative updates and to be consistent with the policy intent of mitigating any further  
3 development impacts to the shoreline environment. Some highlights include the following:  
4

- 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.

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

10 17.05.130 Utilities - has been updated to include specific regulations for the development  
11 and use of individual desalination facilities for purposes of water supply, but will only be  
12 allowed when it is demonstrated that no other water source is feasible or available.

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

## 17 **SUMMARY**

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

- 21 1) Based on additional analysis of the environmental constraints associated with many of the  
22 areas originally designated Rural Residential, a strict application of the concept of  
23 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.
- 22 2) A number of new land control ordinances and updated existing regulations are proposed o  
23 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  
few specific informational deficiencies have been noted, but in themselves do not appear to  
have any adverse environmental consequences. Optional elements, in particular Natural  
6 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.

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

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3                   **POTENTIAL MITIGATION MEASURES**

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## POTENTIAL MITIGATION MEASURES

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

9 **Earth**

10 **Unavoidable Impacts**

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

15 **Mitigation Measures**

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

18 1. Direct urban development only to areas that are appropriate to development at urban  
19 densities, avoiding all designated geologic and soils hazards areas.  
20 2. On slopes greater than 15%, maintain low residential densities.  
21 3. In geologically hazardous areas prohibit all uses except those classified as low intensity  
22 uses, such as agriculture and recreation.  
23 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 silviculture 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.

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

3        **Air**

4        **Unavoidable Impacts**

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

6        **Mitigation Measures**

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

8        10. Minimize trips lengths and reliance on private vehicle use by promoting a compact  
pattern of development in urban areas.

9        11. Prohibit land uses that create noxious or toxic air pollutants near residences, hospitals,  
or other incompatible land uses.

10       12. Increase awareness of the air quality impacts of vehicle emissions, wood stoves, and  
other activities through a public education program.

11       13. Require all new development, including those in rural areas, to have heating sources  
other than wood stoves.

13       14. Establish wood stove emission standards that exceed current state standards.

14       15. Establish outdoor burning bans in UGAs and RACs.

15       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.

16       17. Establish higher emission standards for new industrial and commercial uses that exceed  
state and federal standards.

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

19       **Unavoidable Impacts**

20       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.

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

1        **Mitigation Measures**

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

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

17       **Water - Public Water Systems**

18       **Unavoidable Impacts**

19       Demand for potable water will increase as population grows.

20       **Mitigation Measures**

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

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

- 1 31. Restrict new growth based on projected water availability.
- 2 32. Promote the use of coordinated and connected water systems and discourage development of small, independent water systems.
- 3 33. Require water conservation measures in new development.
- 4 34. Locate new wells inland, away from the coast and especially narrow points of land to reduce potential salt water intrusion.
- 5 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.
- 6

7 **Plants and Animals**

8 **Unavoidable Impacts**

9 Some habitat loss will occur with new development.

10 **Mitigation Measures**

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

- 12 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.
- 13 37. Provide for a County-wide open space network that preserves habitat areas and movement corridors for wildlife.
- 14 38. Establish low density land use designations in significant fish and wildlife habitat areas.
- 15 39. Develop standards that emphasize the preservation of natural vegetation, including widened buffer requirements and standards for the minimum removal and disturbance of vegetation.
- 16 40. Evaluate and revise critical areas regulations to enhance protection of habitat areas.
- 17 41. Establish a land acquisition program for especially significant habitat areas.
- 18 42. Develop a comprehensive habitat management program to protect natural resources in Island County.
- 19

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

21 **Unavoidable Impacts**

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

1      **Mitigation Measures**

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

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

10     **Energy And Natural Resources - Scenic Resources**

11     **Unavoidable Impacts**

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

13     **Mitigation Measures**

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

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

17     **Environmental Health - Noise**

18     **Unavoidable Impacts**

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

20     **Mitigation Measures**

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

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

- 1 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.
- 2 55. Designate compatible land uses to minimize density of people in high aircraft noise areas.
- 3 56. Establish criteria for placement of vegetation zones/noise barriers between significant noise sources and adjacent noise sensitive land uses.
- 4 57. Establish noise level reducing standards for new construction in moderate and high aircraft noise areas.
- 5 58. Encourage use of alternative transportation modes within UGAs and/or RACs to help reduce increases in motor vehicle traffic and mitigate noise problems.

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

8 **Unavoidable Impacts**

9 None identified.

10 **Mitigation Measures**

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

- 12 59. Pursuant to GMA requirements, ensure that all other Island County plans and policies are consistent with the adopted Comprehensive Plan.
- 13 60. Establish location criteria for different land uses to be used in evaluating rezone requests and to help determine future growth areas.
- 14 61. Establish a process for inventorying existing land uses including vacant lands and updating as development occurs.
- 15 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.
- 16 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.

18 **Housing**

19 **Unavoidable Impacts**

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

21 **Mitigation Measures**

22 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  
housing.
- 3 66. Promote housing affordability by encouraging a variety of housing types in appropriate  
locations, including common wall housing, accessory units, manufactured housing,  
clustered developments, and farm worker housing.
- 4 67. Identify surplus public lands that may be suitable sites for future development of low  
and moderate income housing.
- 5 68. Establish policies and incentives to support the availability of affordable housing.
- 6
- 7

#### **Light and Glare**

##### **Unavoidable Impacts**

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

##### **Mitigation Measures**

The following are potential mitigation measures that the Comprehensive Plan and future 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  
development may emit.
- 15

#### **Aesthetics**

##### **Unavoidable Impacts**

Increased development of natural landscapes reduces overall aesthetic quality.

##### **Mitigation Measures**

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

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

- 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 minimize the unnecessary alteration of the landscape and to preserve natural systems and scenic amenities.

4 **Recreation**

5 **Unavoidable Impacts**

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

7 **Mitigation Measures**

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

- 9 78. Implement recommendations outlined in the County Comprehensive Parks and Recreation Plan.
- 10 79. Establish an inter-connected open space network throughout Island County.
- 11 80. Identify priority areas for future open space acquisition.
- 12 81. Require that new development provide recreational open space to meet the established standards.
- 13 82. Seek funds to acquire new open space by assessing impact fees on new development, issuing open space bonds, or pursuing other funding sources.

15 **Historic and Cultural Preservation**

16 **Unavoidable Impacts**

17 None identified.

18 **Mitigation Measures**

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

- 20 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.
- 21 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, preferential tax treatment, TDR programs, and other creative techniques.
- 9 90. Reduce the potential for conflict between resource lands and adjacent uses by promoting special buffers, setbacks, and opportunities for clustered development.

10 **Transportation**

11 **Significant Unavoidable Impacts**

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

13 **Mitigation Measures**

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

- 15 91. Promote greater transportation system efficiencies, such as transit and other alternative modes of transportation, by creating designated areas with relatively higher residential densities.
- 16 92. Minimize trip lengths and maximize the opportunity for non-motorized transportation by locating services and employment centers near residential areas.
- 17 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 standards that promote ease of access to transit and other alternative modes of transportation between UGAs, RACs and PRCs.

- 1 94. Assist in future transportation planning by clearly designating the location of future population concentrations and other traffic generators.
- 2 95. Pursuant to the GMA, establish levels of services for the future transportation system.
- 3 96. Identify specific transportation system improvements that would be necessary to maintain the established level of service.
- 4 97. Require funding and construction of major transportation facilities concurrent with new development.
- 5 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.
- 6 99. Assist in the avoidance of future traffic hazards by providing some predictability and improved ability to plan needed improvements.
- 7 100. Seek additional funding for the correction of existing and projected traffic hazard areas.

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

10 **Mitigation Measures**

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

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

1      **Public Services And Utilities - Schools**

2      **Mitigation Measures**

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

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

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

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

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

13     **Public Services and Utilities - Parks and Other Recreational Facilities**

14     **Mitigation Measures**

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

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

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

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

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

22     **Public Services And Utilities - Communications**

23     **Mitigation Measures**

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

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

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

1      **Public Services and Utilities - Water/Stormwater**

2      **Mitigation Measures**

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

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

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

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

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

15     124. Establish levels of service for stormwater facilities.

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

18      **Public Services and Utilities - Sewer/Septage/Solid Waste**

19      **Unavoidable Impacts**

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

23      **Mitigation Measures**

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

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

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

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

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

34      130. Provide coordinated planning for sanitary sewer when existing development patterns  
35      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 processes.

4

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 and affected Indian Tribes to identify and protect archaeological sites in the County.
- 8 135. Continue to require property owners or project proponents to avoid or mitigate impacts to archaeological sites during any proposed development projects.
- 9 136. Continue to operate under the policy preferring avoidance of impacts to archaeological sites during any proposed development project.
- 10 137. Provide training for County permitting staff in archaeology and culture of Indians of Island County.

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