

HALSAN FREY LLC
REAL ESTATE DEVELOPMENT & CONSULTING SERVICES

August 8, 2017

Ms. Beckye Frey
Senior Long Range Planner
Island County Planning & Community Development
1 NE 6th Street
Coupeville, WA 98239

RE: WRIGHT'S CROSSING
(CPA 252/17)

Rcv'd Island County

AUG 28 2017

Dear Ms. Frey: *BECKYE,*

Community Development

With regard to the August 8, 2017 Notice from Island County we offer the following (using your numbering system for the listed corrections):

1. Land use designation changed
2. Rezoning request added
3. Project narrative expanded to include additional information on Comprehensive Plan consistency.
4. Total acreage increased to reflect Wright's Crossing ownership plus the area north between the project site and the existing UGA/City Limits.
5. Parcel information amended as directed
6. A new map has been created and labeled as directed with a donut hole. The parcel zoned Commercial Agricultural is not part of the proposal; all documentation has been corrected accordingly.
7. We removed reference to JPA expansion. It is our understanding Oak Harbor and Island County are working on this independently of anything we are doing.
8. We've amended our supplemental information for item XIV to reflect the Oak Harbor Resolution
9. Answer changed as directed
10. Narrative amended
11. Land Capacity Estimates amended to reflect just unincorporated UGA land and footnoted. Since our application has no impact on employment capacity, we used total UGA number from the Buildable Lands Analysis.
12. We amended Section XVI, sub-item 2 and the supplemental information associated based on your August 9th follow-up letter in response to my email. The contact information for the data provided is Christine Cribb at the Chamber of Commerce.
13. NAS Whidbey growth. Based on information provided by Captain Geoff Moore (Base Commanding Officer) at the August 17th, 2017 State of the Station Address; and Tony Popp (Assistant Public Affairs Officer) during a February 2017 public presentation, we stand by

the numbers initially submitted on August 1st. We're not going to react to the un-signed, undated document attached to the August 8th Notice.

14. Municipal Comments. Steve Powers will be submitting these directly

Property Owner Notification – Copy of letter and map is in the attached packet, along with list of property owners who they were mailed to. Notarized affidavit of mailing is also included.

SEPA – All items on the checklist initially submitted were completed with the best information we have at this time. We need make some changes to the checklist to note Ebey's Reserve, the site's history of farming and how that might impact future residents, and noted that future project residents will likely have some impact on Ferry traffic. At this point we have not prepared any detailed biological assessments or traffic impact assessments. We have already contracted with a traffic engineering firm and an EIS consulting firm. If the Board chooses to docket our request for processing, we will begin the EIS work immediately, working closely with your staff to make sure it addresses all issues. It's simply too soon in the process have in-depth detail work completed. If docketed, that will be the trigger.

Thanks again for all your help!

Sincerely,



Carl E. Halsan
Member

c: Wright's Crossing LLC



Comprehensive Plan / Development Regulation Review & Amendment (CPA)

APPLICATION, PART 1

Project # 252/17 (assigned by staff)

I. GENERAL INFORMATION

PROJECT/DEVELOPMENT TITLE: Wright's Crossing

Planning Area: [x] North Whidbey [] Central Whidbey [] South Whidbey [] Camano Island [] Countywide

Did you attend a pre-application meeting? [] No [x] Yes - Date(s): April 27 & June 1

Have you contacted the city or town regarding the amendment? [] No [x] Yes

Is the amendment to correct an error? [x] No [] Yes

Requested Docket Type: [] Periodic Update [x] Annual Review Docket Year: 2017

Has this proposal been previously submitted? [x] No [] Yes - Docket cycle(s) or year(s):

APPLICATION TYPE(S) - check all that apply

[x] A. Plan Amendment

[x] A1. Island County Comprehensive Plan (Plan Amendment)

[] A2. Freeland Subarea Plan (FSP Amendment)

Amendment type:

[] A.I. Text Amendment Chapter(s)/Section(s):

[x] A.II. UGA/NMUGA Boundary Revision: UGA (A new land use designation is required with a UGA expansion and must be described below.)

[] A.III. JPA/FGA Boundary or Overlay Revision:

[x] A.IV. Land Use Map Designation Revision From: Rural To: Unincorporated Municipal UGA

[] A.V. Other Map Revision Map Number(s):

[] B. Development Regulation Amendment or Proposal

[] Amendment to ICC Code Section(s):

[] Nomination of species or habitat of local importance:

[x] C. Type IV Rezoning Request

From: Rural (R) & Rural Agricultural (RA)

To: Oak Harbor Residential (OH-R)

[] C1. Rezoning consistent with Land Use Map Designation (no Plan map amendment required) [x] Non-Contiguous Parcels [x] Parcels under separate ownership

[x] C2. Rezoning Request that would require a Plan map amendment (The associated Land Use Designation Revision must be described above.)



Comprehensive Plan / Development Regulation Review & Amendment (CPA)
APPLICATION, PART 1

Project # _____ (assigned by staff)

II. APPLICANT AFFIDAVIT:

I, Carl E. Halsan, hereby certify that I am the authorized applicant and that I have familiarized myself with the rules, regulations, and procedures with respect to preparing and filing this application and that all statements, answers and information provided as part of this submittal are in all respects complete, true, and accurate to the best of my knowledge and belief.

I hereby request that the following amendment to be considered for placement on the docket:

APPLICATION TYPE (Check all that apply):

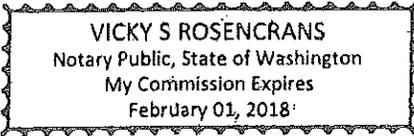
- A. Plan Amendment
B. Development Regulation Amendment
C. Type IV Rezoning Request

I understand that ALL of the application checklist items must be submitted at the time of application or the application will not be accepted. After the application is accepted, the Planning Department will perform a detailed review of the application and will advise me if the application is technically complete.

I understand that while I may choose to submit a map with a conceptual proposed UGA and JPA boundary revision, I acknowledge that the County will determine the location of any boundary revisions, if they are determined to be needed, after a thorough review and Joint Planning effort and may not reflect the size and location submitted in my application.

Carl E. Halsan
Full Name (Please Print)
Signature (Owner or Authorized Agent)*
Date: July 27, 2017

State of Washington
County of Island
On This day personally appeared before me Carl E. Halsan



to me proven to be the individual(s) described in and who executed the within and foregoing instrument, and acknowledged that he signed the same as his free and voluntary act and deed, for the uses and purposes therein mentioned.

Vicky S. Rosencrans (Notary Signature)
Vicky S. Rosencrans (Printed Notary Name)
8/1/17 (Date)
Oak Harbor, WA (Residing at)
2/1/18 (My commission Expires)

* If the signature is other than the property owner, then the Applicant Authorization Form must be signed and notarized.



Comprehensive Plan / Development Regulation Review & Amendment (CPA)

APPLICATION, PART 1

Project # _____ (assigned by staff)

III. APPLICATION CHECKLIST

Application must be typed or printed in ink. In order to speed our review of your application, please provide all information requested; if any portion is not applicable, enter N/A.

Applicant Planning	APPLICATION REQUIREMENTS by Application Type	<u>A</u>	<u>B</u>	<u>C</u>
		Plan Amendment	Code Amendment	Type IV Rezoning
<input type="checkbox"/> <input type="checkbox"/>	Application Fee: _____	✓	✓	✓
Application Part 1. Narrative Description, Checklist, & Forms		<u>A</u>	<u>B</u>	<u>C</u>
<input type="checkbox"/> <input type="checkbox"/>	Section I. General Information	✓	✓	✓
<input checked="" type="checkbox"/> <input type="checkbox"/>	Section II. Applicant Affidavit	✓	✓	✓
<input type="checkbox"/> <input type="checkbox"/>	Section III. Application Checklist	✓	✓	✓
<input type="checkbox"/> <input type="checkbox"/>	Section IV. Contact Information	✓	✓	✓
<input type="checkbox"/> <input type="checkbox"/>	Section V. Project Narrative	✓	✓	✓
Application Part 2. Supporting Data & Documentation		<u>A</u>	<u>B</u>	<u>C</u>
<input type="checkbox"/> <input type="checkbox"/>	Section VI. Parcel Information	A.II, A.III, A.IV, A.V	✓	✓
<input type="checkbox"/> <input type="checkbox"/>	Section VII. Documentation of Property Owner Notification (If applicable)	A.II, A.III, A.IV, A.V	✓	✓
<input type="checkbox"/> <input type="checkbox"/>	Section VIII. Property Owner Affidavit	A.IV, A.V		✓
<input type="checkbox"/> <input type="checkbox"/>	Section IX. Applicant Authorization (if applicable)	A.IV, A.V		✓
<input type="checkbox"/> <input type="checkbox"/>	Section X. SEPA Documentation	✓	✓	✓
<input checked="" type="checkbox"/> <input type="checkbox"/>	Section XI. Supporting Data	✓	✓	✓
Application Part 3. Supplemental Attachments		<u>A</u>	<u>B</u>	<u>C</u>
<input checked="" type="checkbox"/> <input type="checkbox"/>	Supplemental for UGA Boundary Revisions	A.II		
<input checked="" type="checkbox"/> <input type="checkbox"/>	Supplemental for JPA Boundary Revisions or Overlay Revisions	A.III		
<input type="checkbox"/> <input type="checkbox"/>	Supplemental for Nomination of Species or Habitat of Local Importance		✓	
<input type="checkbox"/> <input type="checkbox"/>	Supplemental for Type IV Rezoning Request			✓



IV. CONTACT INFORMATION

AGENT	
Agent ¹ Name:	Carl E. Halsan
Agent Mailing Address:	P.O. Box 1447
	Gig Harbor, WA 98335
Agent Phone Number:	(253)307-1922
Agent Email Address:	carlhalsan@gmail.com
APPLICANT	
Applicant ² Name:	Wright's Crossing LLC
Applicant Mailing Address:	471 SE Pioneer Way, Suite A
	Oak Harbor, WA 98277
Applicant Phone Number:	(360)499-4221
Applicant Email Address:	scott@wrightscrossing.com

¹ An Applicant Authorization Form is required if an applicant uses an agent to apply on their behalf.

² The applicant is considered to be the property owner unless otherwise noted.

Please attach any additional names, addresses, telephone numbers, and emails of professional consultants such as architects, engineers, or scientists associated with this application not otherwise identified above. Label attachment as 'Part 1 – Section IV, Consultant Contacts.'

V. PROJECT NARRATIVE

On a separate sheet of paper provide the following information, attached to this application and labeled as 'Part 1 – Section V, Project Narrative.' Please number your answers in accordance with the question you are answering.

- 1. A detailed description of the proposal.
- 2. Reasoning for why the amendment/revision is being proposed. If proposed to correct an error, explain how or why the map or text is in error.



Comprehensive Plan / Development Regulation Review & Amendment (CPA) APPLICATION, PART 1

Project # _____ (assigned by staff)

3. An analysis of alternatives considered and why the proposed option was selected over other alternatives.
4. A detailed and thoughtful explanation of anticipated impacts to be caused by the proposed change. Include impacts to the public (traffic, noise, water, sewer, public facilities needed, etc.) as well as a discussion of potential un-intended consequences and possible ways to prevent them. Environmental impacts will be detailed in the SEPA checklist, but should be summarized with this response.
5. An explanation of how the change relates to or impacts existing development regulations (would a regulatory change be needed) or how the amendment brings the development regulations into compliance with the plan.
6. To maintain consistency, please identify impacts to other Plan Elements, zoning districts, permit processing procedures, or related plans and/or policies.
7. A detailed explanation of how the proposed amendment is consistent with the applicable provisions of the:
 - a. Growth Management Act (GMA).
 - b. Countywide Planning Policies (CWPPs).
 - c. Comprehensive Plan value statements, implementation strategies, goals, and policies.
 - d. Freeland Subarea Plan, if property within or change proposed to the Freeland NMUGA
8. Are the assumptions underlying the applicable portions of the plan or development regulations no longer valid because new information is available which was not considered at the time the plan or regulation was adopted? Provide a detailed explanation and source(s) of new information.
9. Unless specifically authorized by the Board, no docketed plan amendment application submitted by a member of the public that is ultimately denied by the Board may be resubmitted for three (3) years. If this proposal was previously denied within the past three (3) years, what circumstances have significantly changed to justify this resubmitted application (ICC 16.25.050(G))?

PROJECT NARRATIVE

Wright's Crossing UGA Expansion

1. The proposal is for Island County to expand the Oak Harbor UGA south to include 11 parcels Wright's Crossing has under contract with a total acreage of 247.81. Our suggestion is to also have the UGA expanded with additional parcels between the Wright's Crossing land and the current City limit/UGA boundary so connectivity can be maintained. Upon adoption of the UGA amendment, Wright's Crossing will immediately begin an annexation effort to bring all 10 controlled parcels, and others, into the Oak Harbor municipal limits.
2. In accordance with the City of Oak Harbor's Resolution 17-13, passed and signed on July 26th, 2017, we ask for Island County to expand the City/County JPA and designate the new area for Priority Growth.
3. With the explosive growth of Naval Air Station Whidbey, the growth in civilian employment within the north county UGA, the extreme lack of affordable housing, and the lack of urban land available to develop with such housing, it is necessary for the Oak Harbor UGA to expand. Wright's Crossing LLC was created to help solve the affordable housing problem in the area, and has been working closely with Oak Harbor officials and the Navy for the past 12 months. After performing an inventory of the available property, the best site with enough developable acreage was selected. Given that the 247.81 acres is currently designated Rural it is necessary for the land to be re-designated Urban.
4. As an alternative to UGA expansion we first looked for vacant land within the existing UGA that could be developed with an infill project. There is simply no parcel or assemblage of parcels available to create a project with enough mass and scale to achieve the economies of scale necessary for a development that can provide affordable single family homes. Similarly, there is no existing urban land available for redevelopment within the current UGA with the size necessary for developing a large scale, affordable single family home project. We considered up-zoning as an alternative (allowing for more single family homes per acre), but there are no sites large enough to meet the demand. We considered an increase in density of multi-family zoned sites, but quickly discounted this alternative since there is plenty of that type of land available now and it is not being used because the market isn't looking for more of that housing type. Finally we looked for land that is currently zoned for other, non-residential uses to see if we could find a site large enough to meet the demand, and found that there aren't any parcels available suitable for re-zoning.
5. If approved, there will be increased traffic in the area, increased noise on a short-term basis during construction, an increase in domestic water usage, an increase in flows to the sewer treatment plant, and an increase in demands on other public facilities and services. A traffic engineer is working on a Traffic Impact Analysis that will be provided to the County as soon as it is complete. We've been working with the Oak Harbor Utilities department on water and sewer, and will continue to coordinate with them as the proposal moves forward. We will begin a conversation with the school district later this year. We don't anticipate any unintended consequences as a result of the project at this time.

6. We don't see any need to change any other regulations as they relate to this proposal at this time.
7. In terms of other plan elements that will be affected, we expect Oak Harbor will provide the details necessary for analysis as the proposal moves forward. This will certainly include the land use, utilities, capital facilities and transportation elements.

7a. Growth Management Act Consistency

- (1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner. ***Adequate public facilities and services can be provided efficiently to the project site given the density and intensity of the planned project.***
- (4) Housing. Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock. ***Approval of the project will allow for development of the needed affordable single family homes that are grossly deficient in supply today in the UGA.***
- (12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards. ***All public facilities and services will be provided to the project site at the developer's expense prior to occupancy of any home. Levels of Service will not decrease below adopted standards at any time.***

7b. Countywide Planning Policies Consistency

Affordable Housing. Opportunities for affordable housing will be provided throughout Island County and a full range of housing types and densities will be permitted in Island County's Urban Growth Areas and Municipalities in order to ensure that the supply of new housing is consistent with demand. ***Approval of the project will allow for development of the needed affordable single family homes that are grossly deficient in supply today in the UGA.***

Urban Growth Areas may be expanded outside of a GMA mandated periodic update cycle if the expansion is necessary for one of the following reasons. For purposes of interpreting these policies "the start of the planning period" shall mean the date on which the most recent periodic update was completed.

b. Employment growth in the UGA since the start of the planning period equals or exceeds fifty percent of the employment growth allocated to the UGA at the start of the planning period. ***The data provided by the Chamber of Commerce shows the UGA expansion is warranted.***

c. Written notification is provided by the Department of Defense, or other reliable and verifiable information is obtained, indicating that prior to the next periodic update cycle, Naval Air Station Whidbey staffing will increase in a manner which would result in population growth equal to or exceeding fifty percent of the population growth

allocated to the UGA at the start of the planning period. ***The data provided by the Department of Defense shows the UGA expansion is warranted.***

In order to meet the need for affordable housing and to accommodate the housing needs for all economic segments of the population, the County and Municipalities will consider the following policies in the development of locally adopted comprehensive plans:

1. A wide range of housing development types and densities throughout Island County should be encouraged and promoted to meet the needs of a diverse population and provide affordable housing choices for all. ***Approval of the project will allow for development of the needed affordable single family homes that are grossly deficient in supply today in the UGA.***

7c. Comprehensive Plan Consistency -- The most directly salient policies from the most current version of the plan that apply to the proposal are the four below.

Goal LU 1.5 – Ensure residential developments are planned to minimize public expenditures for public facilities and services. ***The project will not rely on the expenditure of public money to service the site with public facilities and services.***

Goal LU 2.1.2 – Comprehensive Planning must be adaptable to changing conditions. ***The growth at NAS Whidbey along with the civilian job growth in the UGA is a changed condition warranting changes to the Plan.***

Goal LU 2.4 – Require new development (including subdivisions, site plan approvals, and other development) within UGAs to be served by public sewer and water, except within the MNUGA where demonstrated topographical constraints or other unpreventable factors could support granting variances or waivers to allow private wells and septic systems. ***The Wright's Crossing project will bring public water and sewer to the site and extend these services throughout the site.***

Goal LU 7.6 – Limit overall area which can be developed for large lot residential development. ***Bringing the subject land into the UGA will prevent low density, sprawling housing from being developed on the site, which is likely given its proximity to the current UGA boundary and that the current land owners want to sell and maximize financial return now.***

Goal ED 1.6 – Reduce the inappropriate conversion of undeveloped land in sprawling, low density development. ***Wright's Crossing will at a minimum develop the site with 1,000 new homes, and may go as high as 1,500 new homes. The gross density range will be between 4 and 6 units per acre. Such a density will neither be sprawling nor low density.***

Goal H 1.1 – Encourage the availability of affordable housing for all economic segments of the population. *Affordable housing is currently unavailable for all segments of the population. Approval of the project will allow for fulfillment of the need, furthering the stated goal.*

8. The assumptions underlying the Plan are no longer valid now that we know of the new growth at NAS Whidbey, the civilian job growth in the UGA, the lack of affordable single family homes, and the lack of urban land available for such homes. Approval of the amendment after a new buildable lands analysis is completed will bring the Plan into conformance with the new reality.